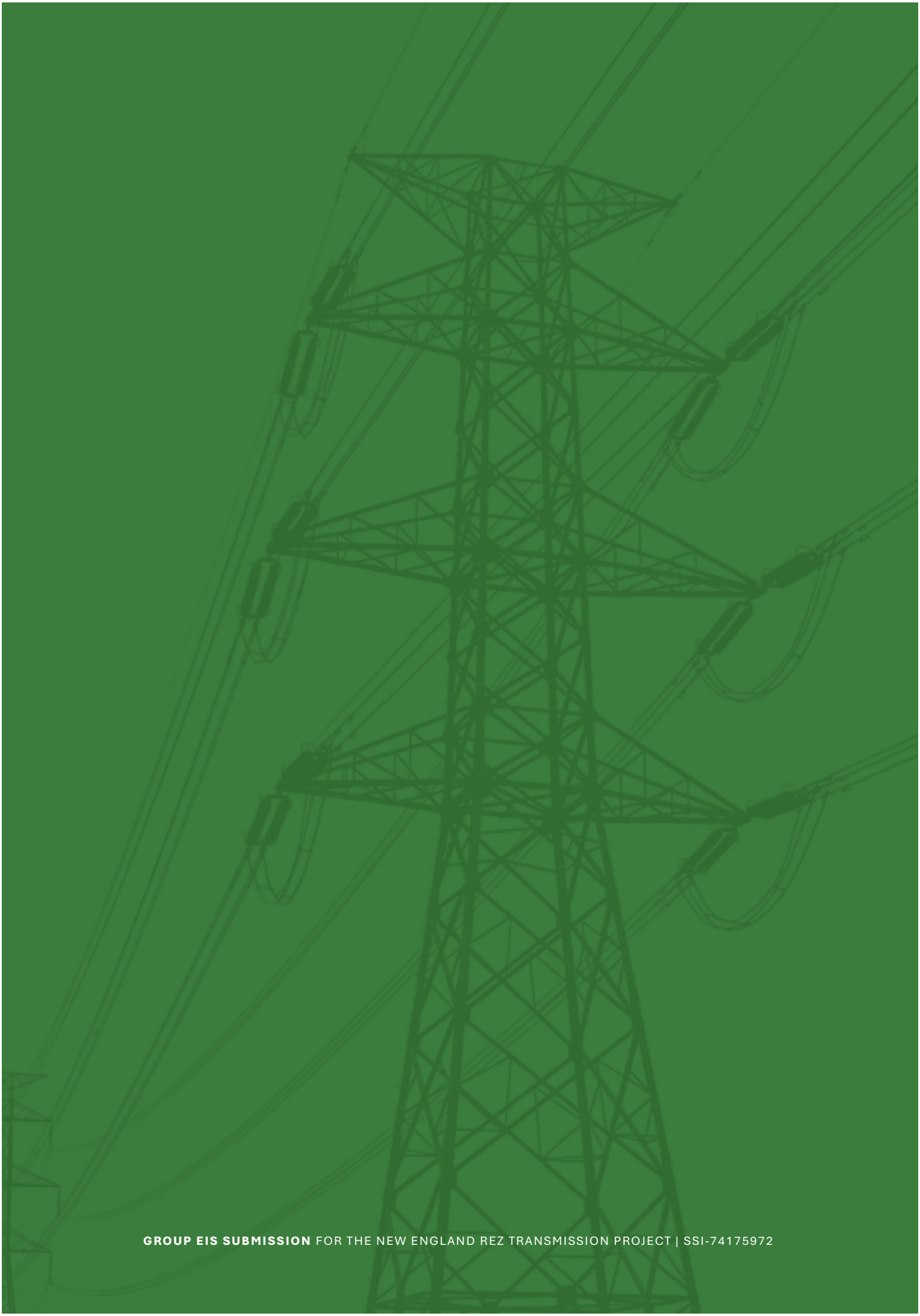
SECTION **14**

Traffic and Transport

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



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SECTION 14

Traffic and Transport

Key issues we have found ...



Traffic figures do not reconcile

Unreconciled load schedules, workforce trips and route allocations prevent residents from verifying actual traffic increases and impacts on individual roads.



Prove roads can carry loads

Acceptable traffic flow cannot establish whether bridges, culverts, pavements and narrow bends can safely carry the proposed oversized heavy loads.



Protect school and farm access

School buses, farm vehicles and emergency services need safe passing, reliable access and enforceable protections before heavy construction traffic increases.



Cumulative traffic assumptions need retesting

Project exclusions and construction timing assumptions need transparent testing against overlapping traffic, particularly where developments share rural roads and



Road damage needs funded remedies

Baseline surveys, repair triggers, maintenance funding and responsibility for cumulative damage remain insufficiently defined, risking lasting costs for rural councils.



Safeguards must precede enabling works

Early roadworks, access tracks and camp construction require assessed footprints, landholder protections and enforceable controls before disturbance or haulage begins.

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> Cumulative traffic assumptions need retesting

SECTION **14**

Traffic and Transport: Evidence, EIS Deficiencies and Required Actions

This submission challenges whether the New England REZ traffic assessment gives the Department sufficient verified, location-specific evidence to determine safety, OSOM route feasibility, road condition, construction impacts, agricultural access, cumulative projects and enforceable mitigation. The core concern is not traffic volume alone, but whether essential works, funding, consents and safeguards are established before the associated exposure. Source discrepancies are stated as matters requiring reconciliation rather than proof that approvals or agreements do not exist.

SUMMARY

SEARs compliance and engineering readiness. Amended SEARs (7 April 2026, Transport p. 4) require road capacity, condition, safety, intersection performance, cumulative traffic, OSOM route analysis, necessary upgrades and maintenance contributions. Detailed TfNSW and council advice also requires transparent responses (Section 1).

OSOM load reconciliation and route approval. Technical Report 7 identifies 53 high-risk one-way OSOM movements in Table 6-15 but itemises 41 in delivery-stage Tables 8-5 and 8-7. Parts of the proposed rural route are not on the approved NSW OSOM load-carrying network; later permits do not replace evidence of physical road suitability (Sections 2–4 and 23–26).

Tamworth route and flooding. The Whitehouse Lane–Marsden Park Road–O'Briens Lane option has missing route particulars in Table 6-7. EnergyCo's separate Tamworth work identifies a modelled 1,020 vehicles per direction per day in an unrestricted sealing scenario, and about 1,806 metres of flood exposure at the Goonoo Goonoo Creek crossing; these figures require scenario-specific safety and flood assessment (Section 23).

School transport, agriculture and rural access. Unverified independent school bus stops, narrow shoulders, agricultural freight, livestock movement, property driveways and OSOM convoy passing require location-specific assessments and protected access before the traffic increase. Level of Service is not proof of safety (Sections 5–7, 24 and 35–36).

Thunderbolts Way and prior mitigation. Figure 6-17 appears to show 492 daily project movements on the route towards Central Hub B; the link, period and actual road-specific exposure need confirmation. The community's 5 September 2026 property mitigation requests require an itemised response (Sections 17–18, 31 and 34).

Cumulative developments and modelling reliability. The assessment requires justified screening of Deeargee Solar, Balala Wind, Hillview Solar, Hillview Wind and Eastern Hub Firming Battery, together with correction or substantiation of Baiada poultry-facility entries and 2030 traffic movements. OSOM overlap needs sensitivity testing rather than unsupported exclusion intersections (Sections 38–39).

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Road funding and enforceable maintenance. Technical Report 7 does not itself disclose road-by-road funded repair thresholds, inspection frequencies or allocation of cumulative damage liability across the Bayswater–Uralla network; the Department should require independently verifiable contributions and obligations (Sections 28 and 31–33).

Road upgrades, land, biodiversity and enabling works. The 31-road/29-road scheduling difference, approximately 580 km of access tracks, about 130 waterway crossings and temporary-versus-permanent footprints require mapped reconciliation with agricultural, water and biodiversity impacts; necessary controls must precede enabling or heavy haulage works (Sections 42 and 45–47).

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1 | Assessment requirements and status of agency advice

Evidence and EIS shortcomings

The amended Planning Secretary's Environmental Assessment Requirements (SEARs), issued 7 April 2026, require assessment of peak and average light- and heavy-vehicle traffic, public-road capacity and condition, road safety, intersection performance, a concept-level route analysis for escorted high-risk heavy vehicles, cumulative traffic impacts, road and intersection upgrade schedules, road maintenance contributions and associated mitigation (SEARs, p. 4). The general requirements also call for consistent information across the EIS and technical reports, assessment of cumulative impacts and uncertainty, and proportionate assessment of significant impacts (pp. 1–2). Engagement must describe issues raised, resulting design amendments and reasons why changes have not been made (p. 6).

Transport for NSW (TfNSW), in its amended advice of 11 February 2026, set out detailed expectations for vehicle and axle configurations, at-risk bridge and culvert assessments, swept paths, rest and pull-over locations, peak agricultural periods, pre-upgrade use of access points and transmission-line crossing stoppages (Attachment A, pp. 2–8; Attachment B, pp. 9–10). Uralla Shire Council's advice of 4 February 2026 similarly sought clarity about haulage routes, road and bridge condition, upgrades, approval pathways, maintenance and reinstatement (pp. 1–2). I recognise that agency advice is not itself identical to the final statutory SEARs; nonetheless, these concerns are directly relevant to the transport issues the final SEARs require to be assessed.

> POSITION SOUGHT

Publish a clause-by-clause SEARs compliance and agency-advice response matrix, citing the relevant EIS pages and explaining any outstanding TfNSW or council matters. Identify what further material will be provided before determination and what must be approved before construction.

2 | Unreconciled high-risk OSOM movement figures

Evidence and EIS shortcomings

Technical Report 7, Table 6-15 (printed p. 95), identifies 53 one-way high-risk OSOM movements: 30 power transformers, eight phase-shifting transformers, ten line shunt reactors and five synchronous-condenser main transformer components. However, the Stage 1 and Stage 2 delivery tables (Tables 8-5 and 8-7, printed pp. 150–151) expressly itemise 41 movements: 30 power transformer units, six shunt reactors and five synchronous-condenser components. The eight phase-shifting transformers and four shunt reactors are not clearly reconciled in those two stage tables.

This is a difference of 12 movements between the overall and stage-specific descriptions. It does not prove those movements were omitted from all traffic modelling, but it requires a clear explanation of scope, timing, destination, routes, vehicle classes and whether the full 53 movements have been included in relevant engineering and cumulative scenarios. The report also refers to approximately 50 movements elsewhere (section 6.5.7, printed p. 95), which adds to the need for a definitive schedule.

TfNSW also requested a description and allocation of non-high-risk OSOM loads. The EIS should separately identify mobile cranes, large construction plant, other special purpose vehicles (SPVs) and lower-risk OSOM

movements; broad heavy-vehicle totals are not a substitute for a route-specific, vehicle-by-vehicle capability assessment.

> POSITION SOUGHT

Issue one reconciled register accounting for all 53 one-way high-risk OSOM movements in Table 6-15 against the 41 specifically itemised in Tables 8-5 and 8-7, with equipment, load configuration, delivery stage, destination, route and model inclusion identified for each discrepancy.

3 | Road traffic capacity is not proof of OSOM route capability

Evidence and EIS shortcomings

The report's level-of-service and passenger-car-unit analyses examine traffic flow and congestion. Such results cannot by themselves demonstrate that an individual oversized or unusually heavy combination can safely use a bridge, culvert, pavement, crest, bend, intersection, shoulder or narrow local road. Technical Report 7 recognises geometric and road condition limitations and provides concept treatments (sections 6.4.2 and 6.7.5; Table 6-21), but states that final design and some route approvals will be confirmed later. EnergyCo itself acknowledges in Technical Report 7 (printed p. 60) that lower-order regional and local roads can have constrained geometry, reduced pavement and bridge capacity and limited recovery zones, restricting their suitability for routine OSOM movements. This acknowledgement reinforces the need for road-by-road structural assessments and identified, funded preventative strengthening before substantial project haulage proceeds.

The Department should require a complete engineering route capability register from the Port of Newcastle and relevant connections to the energy hubs, including the Bayswater–Muswellbrook–Tamworth–Uralla corridors, Muswellbrook and Tamworth detours and onward local roads. It should state for each proposed load: loaded length, width, height, gross mass, axle-group loads, bridge/culvert assessments, clearance limits, turning swept paths, road widths, overtaking/pull-over opportunities, approval conditions, road upgrades and completion dates. Where the project relies on Port-to-REZ upgrades or works approved separately, EnergyCo should demonstrate an actual compatibility check against the load envelopes and identify responsibility for any additional works.

Further evidence and assessment gap. Technical Report 7, §4.5.3 (printed p. 53), provides a further reason for caution in applying network Level-of-Service (LoS) results to narrow rural roads. Its modelling distinguishes local sealed roads with indicative midblock capacity of approximately 900–1,000 passenger-car units per hour from assessed local unsealed roads with a reduced assumption of approximately 270 passenger-car units per hour, reflecting surface condition, geometry and operating environment. These are model capacity parameters, not evidence that opposing B-doubles, OSOM vehicles, school buses and livestock trucks can pass safely at a particular curve, crest, bridge, icy verge or driveway. The apparent tension between §6.7.3's broadly favourable LoS conclusions (printed pp. 105–109) and §8.5.2's cumulative LoS B/C results on routes including Barry Road and Forest Way (printed pp. 153–154) needs a route-specific explanation and sensitivity testing for adverse weather, one-way controls, grades, slow heavy vehicles and escorted loads.

> POSITION SOUGHT

Supply a vehicle-by-vehicle and road-by-road engineered route capability assessment, including maximum laden and axle-group loads, bridge and culvert ratings, route geometry, swept paths, existing restrictions and Port-to-REZ compatibility. Identify an approved alternative or funded improvement where suitability cannot be demonstrated.

Additional requirement by EnergyCo. Provide a road-by-road comparison of adopted PCU capacity, measured daily and peak-hour traffic, directional width, turning and passing constraints and the resulting LoS under baseline, construction and cumulative scenarios. Test Barry Road, Forest Way and other narrow/unsealed mountain routes under realistic OSOM convoys, school and agricultural movements, winter conditions and stop/go controls; identify when physical improvements, alternative haulage routes or enforceable scheduling are required.

4 | Unapproved route sections and reliance on other projects

Evidence and EIS shortcomings

Table 6-9 (printed p. 88) records that sections of Staces Road, Thunderbolts Way, Darjeeling Road and Saleyards Road are not presently approved on the NSW OSOM load-carrying network, although different network conditions apply to some 4.6-metre-high vehicles. The report anticipates future permits and treatments; those commitments do not replace evidence of the route's physical suitability and necessary safeguards at the EIS stage.

A further concern is that Table 6-9 (printed p. 88) identifies the section of Thunderbolts Way between approximately Mirani Road and Darjeeling Road, together with Staces Road, Darjeeling Road and Saleyards Road, as not approved on the NSW OSOM load-carrying vehicle network. Approval with conditions on the separate NSW 4.6-metre-high vehicle network cannot be taken as approval for the specific exceptionally heavy or oversized loads proposed by EnergyCo. Although section 6.4.2 states that the necessary road-access approvals will be obtained before haulage, it does not establish that the nominated route has already been approved for those loads or that all relevant structural and safety constraints have been resolved. How can the Department adequately assess the risks to residents, school buses, stock trucks and agricultural machinery on Thunderbolts Way and its connecting rural roads without verified load specifications and route-specific evidence? I request that EnergyCo provide a dated extract of applicable OSOM network access restrictions; actual vehicle dimensions, gross and axle masses; bridge, culvert, pavement, intersection and swept-path assessments; the status of required permits and road-manager consents; and a funded program of upgrades and safety measures. These matters should be scrutinised before project determination, with all required approvals and safety works secured before OSOM haulage commences.

The report also assumes a new Staces Road–Thunderbolts Way connection will be delivered through earlier works associated with other developments (sections 6.4.2 and 6.6.1; printed pp. 87 and 97). If that connection is unavailable, general construction traffic would instead use existing routes through Uralla, while a temporary construction track is contemplated for limited OSOM access. These are materially different impacts for residents, town streets and road authorities. The Department should require a funded, approved and dated delivery schedule for both scenarios, a clear distinction between works within this approval and works delivered by others, and a road-by-road comparison of traffic, safety and amenity

consequences. Construction traffic should not use a route before its necessary upgrades and access approvals are in place.

> POSITION SOUGHT

Identify the precise OSOM approvals and conditions for Staces Road, Thunderbolts Way, Darjeeling Road, Saleyards Road and every proposed detour. Produce separate route, traffic and construction programs with and without the Staces Road connection; state the authority, funding and completion date for all prerequisite works.

5 | School buses, rural lay-bys, narrow roads and residents' safety

Evidence and EIS shortcomings

Technical Report 7 recognises school bus operations on Thunderbolts Way and connecting rural roads. Section 6.7.12 (printed p. 128) proposes consultation with bus operators, scheduling outside school bus times "wherever practicable", localised passing opportunities and possible relocation of stops. It also predicts no significant effect on school bus reliability or safety. These broad assurances are not a substitute for a documented, location-specific assessment of all affected pickup and drop-off points, stopping sight distances, safe shoulders, places for parents to pull over, and the ability of school buses to pass or be passed by construction trucks.

A route-level safety plan should identify existing bus routes and stops, the location and dimensions of any required school bus lay-bys and passing bays, the timing and funding of those works, and enforceable measures separating OSOM movements and high-volume construction traffic from school pickup and drop-off periods. Public maps need not expose sensitive information about individual children, but road authorities and bus operators must have the detailed safety evidence.

The same location-specific treatment is needed for driveway entries on narrow sections of Thunderbolts Way, Salisbury Plains Road and affected Staces Road connections, including safe turning and visibility for residents, stock trucks, tractors, floats and agricultural machinery. The assertion in section 6.7.13 that access effects will be minimal because of the rural context needs to be tested against actual farm access needs, not assumed from low population density.

The selected Tamworth OSOM corridor must also be subjected to a separate school-transport conflict assessment. Transport for NSW's published S236 "Nundle to Tamworth Schools via Woolomin" school service includes Nundle Road before O'Briens Lane, Farrer Memorial Agricultural High School and Carinya Christian School among its stops, demonstrating that school movements occur in the wider corridor. Farrer also reports its own bus fleet, and Carinya identifies several private transport operators serving its students. This is evidence of school transport activity, not proof that every service traverses each bypass segment. EnergyCo must establish the actual morning, afternoon and school-event routes, bus turning requirements, parent drop-off patterns, legally applicable school-zone and speed restrictions, and all intersections or sections where OSOM escorts, construction traffic and school movements could conflict, including the O'Briens Lane/Nundle Road junction. An indicative regional bus assessment and assurances that OSOM traffic will avoid school times "wherever practicable" are not adequate substitutes for an independently reviewed, school-specific safety schedule, safe stopping and passing areas, enforceable timing restrictions and emergency/flood closure procedures.

Further evidence and assessment gap. Community transport observations dated 1 November 2026 identifies the intersection of O'Briens Lane and Nundle Road as a specific school-travel pinch point, with traffic associated with Farrer Memorial Agricultural High School and nearby Carinya Christian School. The claimed 40 km/h school-zone exposure and the precise boundary, operating times, direction of bus services and peak queue lengths require confirmation by the responsible road authority and operators, not inference from a regional school-bus inventory. The selected Tamworth bypass should not be justified solely by diversion of OSOM traffic from the CBD if it increases heavy-vehicle conflict at rural school approaches, bus stops, driveways or school-event traffic periods. This is additional site-specific evidence for the missing turning, stopping-sight-distance and protective traffic-management assessment identified in Technical Report 7, §§6.4.2 and 6.7.12–6.7.13 (printed pp. 85–86 and 128–129).

> POSITION SOUGHT

Map and assess every affected school-bus stop, rural driveway and constrained passing location along the proposed traffic routes in consultation with operators, families through appropriate channels and landholders. Design and fund necessary lay-bys, widening, time restrictions and access safeguards before traffic increases. Include the Tamworth bypass and Nundle Road approaches serving Farrer and Carinya; verify Transport for NSW S236 and all relevant private/school-owned services with operators, identify school-zone restrictions and conflict periods, and commit to safe intersection/passing/lay-by treatments and enforceable OSOM movement windows.

Additional requirement by EnergyCo. Obtain the verified Farrer and Carinya school-zone maps, operating hours, independently operated and school-owned bus timetables, turning counts and drop-off patterns for O'Briens Lane/Nundle Road and approaches. Assess the bypass in morning and afternoon school peaks, with enforceable OSOM exclusions or equivalent engineered safety measures, rather than merely undertaking future general consultation.

6 | Unidentified independent private school bus services and incomplete route assessment

Evidence and EIS shortcomings

I raise serious concerns that EnergyCo has not demonstrated that all independently operated private school bus services have been identified and assessed. Section 5.5.2 of Technical Report 7 (printed p. 64) describes school buses within Uralla Shire as operated by Edwards Coaches, and Appendix J, Table J-7 (PDF p. 374), lists 13 Uralla Shire school bus routes, all attributed to that operator. The table includes service S331 via Thunderbolts Way and service S334 via Salisbury Road, yet additional school bus services operated by independent companies have been identified as a concern by affected residents and are not separately identified in that published Uralla route list. The report does not demonstrate that a complete register of all operators, route variations, informal rural pickup and drop-off points, morning and afternoon operating times, and vehicles using connecting roads such as Staces Road and Salisbury Plains Road was obtained and tested against construction traffic forecasts. The absence of additional operators from this table does not, on its own, establish that EnergyCo has never consulted them elsewhere; it does mean that the EIS has not made the coverage and adequacy of such consultation independently verifiable.

This omission is material to road safety. Table J-7 provides morning service times of approximately 7:27 am for S331 and 7:35 am for S334, but does not transparently identify the corresponding afternoon services and exact affected stopping locations. Although Section 6.5 identifies a 5:30–6:30 am peak for workforce mobilisation, Section 6.5.3 forecasts construction-related vehicle deliveries across 7:00 am to 5:00 pm, which may coincide with school bus activity; a workforce-only peak comparison cannot establish that school bus conflict has been avoided. The main EIS, Section 14.2.6 (printed p. 558), relies on Technical Report 7 for the service inventory, while Section 14.3.7 (printed pp. 565–566) concludes that impacts will be temporary and manageable. Mitigation TT23 (printed p. 575) proposes consultation with bus operators during pre-construction and construction, while TT17 and TT18 contemplate passing opportunities and relocation of affected stops. I request that the Department require EnergyCo, before project determination, to demonstrate consultation with every relevant independent and contracted school bus operator and the responsible transport authorities; publish a verified route-by-route school bus impact assessment (protecting the privacy of individual children); identify all affected roads and collection points; and specify funded safe lay-bys, passing areas, driveway treatments, sight-distance improvements, timetable protections, haulage exclusions and enforceable mitigation. Necessary physical protections must be completed before the relevant increase in construction traffic, rather than being left to unspecified future consultation after approval. There should be no reliance on the general conclusion that impacts are manageable until the full population of affected school bus services has been established.

The same route-completeness test should extend to the southern and elevated rural corridors identified in affected residents' evidence, including Niangala Road, Niangala Stock Route Road, Flags Road, Geraldine Road and Hurricane Gully Road. These roads may combine school services, regular rural mail stops, private property accesses, timber and livestock trucks and narrow or unsealed shoulders. An asserted absence of school conflicts cannot be accepted until EnergyCo has identified every relevant service, operator, stop and timetable variation with local verification, including stops used outside formal bus-bay infrastructure; the assessment must address reduced stopping sight distance and safe shoulders during winter fog, frost, ice and heavy-vehicle dust where applicable. Local input identifies potential conflict locations for investigation; it should not be presented as proof that each named road is an approved or confirmed haulage route without a verified route overlay.

Further evidence and assessment gap. A further rural-use conflict identified in the affected residents' material is the regular roadside mail-delivery stopping pattern on Niangala Road, Niangala Stock Route Road, Flags Road, Geraldine Road and Hurricane Gully Road, alongside school services, farm driveways and timber and stock freight. The community describes mail deliveries commonly occurring several times weekly, but the precise frequency and stop locations should be verified with the operator. A low baseline vehicle count does not establish that postal vehicles, stopped school buses or elderly residents collecting mail have safe refuge from construction trucks. On foggy, dusty, icy or otherwise low-visibility sections, a brief stationary stop may be a more serious conflict than an ordinary midblock traffic-flow calculation would reveal (Technical Report 7, §§5.5.2, 6.7.12–6.7.13 and Appendix J).

> POSITION SOUGHT

Verify every public and independently operated private school bus service and stop using the affected roads; reconcile identified service IDs against Appendix J and operators' evidence. Issue a confidential operational safety schedule covering timings, stops, passing and emergency arrangements. Extend the verified school-route inventory to all proposed southern rural road links, with particular checks of Niangala, Flags, Geraldine, Hurricane Gully and adjoining routes, and show each school service against confirmed construction haulage and road-upgrade footprints.

Additional requirement by EnergyCo. Include verified rural mail routes and stopping areas, bus pickups and drop-offs, concealed driveways and livestock-loading points in a confidential operator-validated corridor register; assess each against route-specific heavy-vehicle and OSOM movements, winter visibility and safe shoulder/lay-by design, with funded treatments completed before increased haulage.

7 | Agricultural peak traffic has not been clearly assessed

Evidence and EIS shortcomings

TfNSW's advice specifically requires harvest periods to be accounted for in rural traffic and turn-warrant assessments (Attachment A, p. 3) and refers to school buses, travelling stock routes and harvest periods along high-risk routes (Attachment B, p. 10). While Technical Report 7 contains general traffic counts and peak scenarios, I could not identify a distinct agricultural harvest-period or comparable seasonal peak assessment in the report text reviewed.

Existing agricultural use includes periods when large machinery, stock transport, feed and freight vehicles make movements that cannot simply be shifted to suit construction convenience. The Department should require traffic sensitivity testing during harvest and intensive livestock activity, with input from affected landholders, and enforceable provisions ensuring safe access for time-critical farm operations and emergency services.

Forestry and livestock freight require separate consideration alongside seasonal farm machinery. The affected residents' material identifies Topdale Road, Forest Way, Nowendoc Road and associated northern/southern local roads as regular timber or stock transport routes requiring verification against the project's haulage maps. These vehicles cannot always safely stop, reverse or pull onto soft, narrow or unsealed verges to accommodate escorted OSOM convoys or opposing construction trucks; a sudden manoeuvre may destabilise livestock loads, reduce animal welfare or create a rollover risk. Even where a network capacity model shows acceptable average delay, the practical impact of convoy holds on livestock welfare, timber-haulage schedules, access to saleyards, processors and veterinary services, and the financial consequences of missed transport windows remains untested unless individual conflict points and timed movements are examined. The Department should require EnergyCo to consult livestock and forestry operators, confirm shared road segments, assess vehicle swept paths and passing/holding locations, quantify peak and convoy delays, provide an emergency livestock-transport protocol and secure funded physical improvements and compensation/claims procedures for substantiated disruption.

Further evidence and assessment gap. The affected landholders' evidence identifies Topdale Road, Forest Way and Nowendoc Road as timber and livestock freight corridors, where a laden log truck or livestock combination cannot always stop, reverse or descend onto a soft verge without risking unstable loads, road-edge failure, animal injury or loss of time-critical delivery windows. Potential congestion or emergency braking during cattle, sheep or forestry transport needs assessment in terms of road geometry, turning and stopping distances and animal welfare, not merely aggregate vehicles per hour. This reinforces the agricultural-peak criticism of Technical Report 7's Chapter 6 traffic distribution and Chapter 8 cumulative scenarios and the amended SEARs' requirement to consider road safety and seasonal movements.

> POSITION SOUGHT

Re-model farming-traffic peaks during harvest, calving, lambing and livestock movements, using documented consultation with agricultural landholders and operators. Show how revised forecasts change turn treatments, passing arrangements and construction hours. Incorporate forestry log trucks and live-livestock heavy vehicles on Topdale Road, Forest Way, Nowendoc Road and any other verified shared routes; model convoy delay, emergency turning/passing and safe load stability rather than relying on average network performance.

Additional requirement by EnergyCo. Consult livestock carriers, stock producers, forestry hauliers and councils about seasonal freight peaks and destination deadlines, including safe turnaround and convoy-release locations; establish enforceable no-conflict windows and engineered passing capacity rather than assuming freight vehicles can routinely pull onto unsealed verges.

8 | Conflicting intersection treatments and other assumptions

Evidence and EIS shortcomings

The intersection of Thunderbolts Way and Salisbury Plains Road (IS_USC_09) is identified for a BAL treatment in the main report (section 6.7.4 and Table 9-2), while Appendix G identifies AUL. These are different treatments and require reconciliation in the final road-upgrade schedule and drawings. The report also uses approximately 150 local workers in section 2.3.1 but approximately 200 in sections 6.5.2 and 6.5.4. EnergyCo should explain which numbers and intersection configurations drive the relevant forecast and design.

The report identifies sight-distance and geometry constraints at Thunderbolts Way access locations IS_USC_13 and IS_USC_14 (Appendix G). The Department should require an auditable intersection and property-access register containing coordinates, route and vehicle types, peak turning volumes, sight-distance calculations, swept paths, proposed treatment, construction duration, land requirements and completion status for every affected intersection, with particular scrutiny of IS_USC_06, IS_USC_07, IS_USC_09, IS_USC_13 and IS_USC_14.

> POSITION SOUGHT

Publish one controlled intersection-design schedule reconciling IS_USC_09, IS_USC_16, IS_USC_22 and other discrepancies across report tables, Appendices G/H/K and road authority standards. Demonstrate that each selected treatment resolves measured geometry and sight-distance risks.

9 | Workforce camp information, traffic calculations and local road safety

Evidence and EIS shortcomings

Technical Report 7, section 6.2.6 (printed p. 75), contains incomplete camp identification in its discussion of Camp 3 and acknowledges that the proposed Barry-area location had not been confirmed. The main EIS (section 3.3.5, printed pp. 110–111) also states that Camp 3 and the possible Camp 1 alternative require further detailed assessment in an Amendment Report. Other errors occur in section 6.6.3 (printed p. 101), which describes Camp 5 as accommodating approximately "0 workers" and omits its identifier elsewhere, and in section 6.7.3 (printed p. 108), which appears to refer incorrectly to Camp 4 alongside Central Hub A, where Camp 5 is located. There are material questions about the traffic figures: section 6.5.2 (printed p. 91) assumes about 1,200 camp-based workers, whereas the camp allocations in Table 6-11 (printed p. 92) total 1,250. The approximately 1,100 daily two-way movements attributed to Camp 5 in section 6.6.3 are construction movements; Table 3.6 of the main EIS (printed p. 114) reports 1,316 when the additional 212 camp-workforce movements are included. These latter figures are reconcilable, but the summary must specify which categories are included to prevent the total local traffic burden being misunderstood. I request corrected camp references and reconciled occupancy and traffic figures; transparent, camp-by-camp and road-by-road movements (including workforce shuttles, construction heavy vehicles, camp deliveries, servicing and cumulative projects); and an independently reviewable assessment of road safety and funded mitigation on Glenburnie Road, the New England Highway, Thunderbolts Way, Staces Road, Salisbury Plains Road and the affected Uralla streets before determination or increased construction traffic.

Additional missing camp identifiers — Technical Report 7, printed pp. 75, 101, 104, 110 and 113. The camp references left incomplete in §6.2.6 (p. 75) are not isolated. The narrative in §6.6.3 (p. 101) repeatedly omits camp numbers when explaining workforce accommodation and the highest camp-related traffic generation; further apparent omissions occur in the enabling-works discussion (p. 104), in comparisons of camp access and movements (p. 110), and in the discussion of construction traffic potentially diverted from Uralla by the proposed Staces Road–Thunderbolts Way connection (p. 113). Although nearby headings and tables may permit some identifiers to be inferred, affected residents and the consent authority should not have to infer which camp is being assessed, which road receives its movements or which access treatment is proposed. These omissions are material alongside the documented inconsistency between camp-based construction movements and totals including workforce transport, unresolved Camp 3 siting and the reliance on the Staces Road connection to redistribute traffic. They do not, by themselves, prove incorrect traffic modelling, but they call into question the quality assurance and traceability of the camp-specific inputs used for road, intersection, school-bus and agricultural-access assessments. The amended SEARs (Transport, p. 4) require sufficient and transparent assessment of traffic generation, road safety and cumulative effects; relevant supporting records include Technical Report 7 §§6.2.6, 6.6.3 and 6.7.2–6.7.4, Tables 6-11, 6-16 and 6-19, and main EIS §3.3.5 and Table 3.6. Cross-reference Sections 16 and 20 of this submission.

Further evidence and assessment gap. Camp 3 requires a geographically specific test. Technical Report 7, §6.5.3 and Table 6-12 (printed p. 92), forecast 318 two-way light-vehicle and 102 two-way heavy-vehicle construction movements per day for Camp 3 (420 combined). Those values must not be mistaken for a complete estimate of all movements, because workforce, deliveries and local services may be accounted for separately in other tables. The affected residents' submission identifies possible access from Tamworth via Nundle Road, Chaffey Dam, Nundle, Lindsays Gap Road and Barry Road, including tourism associated with Chaffey Dam, Sheba Dams, Hanging Rock and winter snow. The precise distribution among these roads is not established by the community account and must be tested against the actual camp entrance, work fronts and route assignment. These roads can experience icy surfaces, wet shoulders, traffic generated by visitors

and occasional snow-related access restrictions, which are not adequately characterised by even hourly spreading of camp vehicle totals (Technical Report 7, §§6.5.3–6.5.6, printed pp. 92–94; main EIS §3.3.5, printed pp. 110–112).

Further supporting evidence. Particular attention is also needed to potential temporal and route overlap with Hills of Gold Wind Farm and other approved or reasonably foreseeable projects near Nundle. This does not demonstrate that all such traffic will use Barry Road or arrive concurrently; it demonstrates the need to verify actual construction programs, camp operating periods, tourism events, seasonal road closures and the adopted traffic-distribution assumptions before concluding that Camp 3 access is safe.

> POSITION SOUGHT

Correct every omitted or inconsistent camp number on Technical Report 7 printed pp. 75, 101, 104, 110 and 113, and throughout the report and appendices. Publish a single verified camp-by-camp schedule specifying each numbered location, status and capacity; construction stage; workforce, construction, servicing and heavy-vehicle movements by day and peak hour; access points and routes; affected intersections; and the corresponding EIS and model inputs. Reconcile the schedule with Tables 6-11, 6-16 and 6-19, main EIS Table 3.6, and the Staces Road diversion assumptions; explain each correction and demonstrate whether any model results or mitigation decisions change. Provide the corrected, independently reviewable assessment before determination, including road-condition, intersection, property-access and school-bus safeguards, the responsible authorities and funded delivery dates.

Additional requirement by EnergyCo. Before relying on Camp 3 forecasts, identify the definitive site and entrances; publish movement tables separately for the 318 LVE/102 HVE construction trips, workforce, service deliveries, water and waste and any OSOM movements; allocate each to actual roads and hours; and complete an independently checkable traffic, winter-weather, tourism and cumulative-project assessment for Nundle, Chaffey Dam, Barry Road, Lindsays Gap Road and the Sheba Dams/Hanging Rock approaches where affected.

10 | Construction hours, early-morning traffic noise and agricultural access

Evidence and EIS shortcomings

I raise serious concerns about the adequacy of the assessment of construction-related vehicle movements outside normal work hours, and the consequences for rural roads and farming operations. Technical Report 7, section 6.3 (printed p. 76), sets normal weekday construction hours at 7 am–6 pm but anticipates workforce travel from 6 am–7 am, while section 6.5 (printed p. 90) identifies an earlier peak of 5:30 am–6:30 am; both descriptions require reconciliation. Vehicles travelling to and from work are an impact on nearby households and road users even when the construction activity itself has not commenced. Crucially, the main EIS, section 16.3.6 (printed pp. 612–613), predicts noticeable construction traffic noise increases on all local roads and exceedances of the NSW Road Noise Policy criteria at 111 residential receivers; mitigation measure NV5 (printed p. 628) only commits to minimising out-of-hours movements where practicable. Although the EIS recognises agricultural constraints and sensitive periods such as calving and lambing in mitigation measure AG3 (printed pp. 541–542), it has not clearly demonstrated how peak, early-morning, evening and exceptional heavy-vehicle journeys will be coordinated with stock trucks, livestock movements,

farm machinery, school buses and rural property access on specific public roads. This lack of location-specific demonstration is directly relevant to the amended SEARs requirements to assess peak and average traffic generation, road safety, road condition, construction noise and mitigation (SEARs, printed pp. 4–5). I request a road-by-road, hour-by-hour schedule for workforce, heavy-vehicle and OSOM traffic, including exceptional and out-of-hours journeys; an assessment of night-time noise at affected residences; and enforceable, funded mitigation and agricultural access arrangements, particularly for Thunderbolts Way, Staces Road, Salisbury Plains Road and other rural haulage routes, before project determination and prior to increased construction traffic.

Further evidence and assessment gap. The main EIS, §3.3.3.2 (printed p. 107), allows for out-of-hours work under defined circumstances, including assessment of potentially affected sensitive receivers. This creates possible traffic peaks outside the standard construction period and may intersect with early livestock freight departures, forestry haulage, tourism traffic, calving/lambing care and school-related travel. The existence of a conditional out-of-hours provision should not be read as authorisation for unlimited movements; its traffic consequences, criteria, maximum frequency, notification periods and accessible complaint and enforcement pathways should nevertheless be disclosed alongside the main traffic forecast.

> POSITION SOUGHT

Publish road- and hour-specific construction, heavy-vehicle and worker traffic forecasts for early mornings, evenings and any out-of-hours activity. Identify affected residences and put in place enforceable noise, safety and property-access controls, with a complaints and compliance mechanism.

Additional requirement by EnergyCo. Publish a separate controlled out-of-hours transport scenario identifying eligible activities, expected two-way vehicle movements by route and hour, duration and frequency, sensitive receivers and specific restrictions on noise, livestock/school conflict, visitor peaks and overnight emergency access.

11 | Proposed construction routes, rural access points and local road safety

Evidence and EIS shortcomings

I raise serious concerns about the adequacy of EnergyCo's site-specific assessment of local road safety under Technical Report 7, Section 6.4 and Figures 6-4 to 6-6 (printed pp. 77–80). Section 6.7.4 (printed pp. 112–113) acknowledges that many construction accesses connect directly to low-volume rural roads, yet the report generally relies on temporary controls for lower-use access points instead of demonstrating their suitability for repeated heavy vehicle movements. A low existing traffic count or satisfactory road Level of Service does not establish safe passing, turning or access for school buses, livestock trucks, agricultural machinery and residents. Table 9-3 (printed p. 181) identifies a high, long-duration traffic increase on Salisbury Plains Road, requiring widening, while the proposed treatment at Thunderbolts Way and Salisbury Plains Road (IS_USC_09) is inconsistently identified as BAL in Table 9-2 (p. 177) and AUL in Appendix G (p. 261). Appendix G (p. 262) also identifies deficient sight distances at Thunderbolts Way construction accesses IS_USC_13 and IS_USC_14, with IS_USC_13 not clearly included in the main upgrade schedule. The proposed Staces Road connection creates two materially different access scenarios: if unavailable, construction traffic uses routes through Uralla; if available, movements are concentrated on rural

connections. The amended SEARs (p. 4) require assessment of road condition, access, safety, intersection performance, cumulative traffic and necessary upgrades, and Uralla Shire Council has specifically requested clear evidence of local road and bridge capability and maintenance obligations. I request a fully mapped, road-by-road and access-by-access safety assessment identifying forecast daily and peak heavy vehicle movements, sight distances, swept paths, school bus stopping and passing areas, farm driveway and livestock access, road and bridge condition, the definitive intersection treatments, funding and delivery dates for upgrades, and separately assessed Staces Road scenarios before project determination.

> POSITION SOUGHT

Produce a mapped schedule of all temporary and permanent construction accesses with turning templates, safe sight distances, road width and surface conditions, daily and peak heavy-vehicle movements, school-bus interactions and any necessary physical improvements.

12 | Construction vehicle movements, agricultural operations and community impacts — Section 6.5.3

Evidence and EIS shortcomings

A key concern is the adequacy of the construction traffic assessment presented in Section 6.5.3, page 92, of Technical Report 7 – Traffic and Transport Impact Assessment. EnergyCo forecasts that Camp 5, servicing Central Hub A, Central Hub B and East Hub, will generate approximately 1,104 two-way construction vehicle movements per day, including 404 heavy vehicle movements, in addition to 212 workforce movements. Despite these substantial volumes, the assessment assumes construction traffic will be evenly distributed between 7 am and 5 pm, without sufficiently demonstrating how this assumption reflects actual construction activities, deliveries, simultaneous work fronts or peak traffic demands. discrepancies between the hourly movement estimates and daily traffic figures require clarification. A further concern is the apparent failure to adequately incorporate the agricultural and community impacts expressly acknowledged in EnergyCo's own supporting reports. Technical Report 6 – Agriculture Impact Assessment identifies potential disruption to harvesting, sowing, livestock movements, grazing, calving and lambing, while Technical Report 4 – Social Impact Assessment acknowledges increased road safety risks, deterioration of rural roads, disruption to school buses, increased traffic noise and reduced residential amenity. These findings raise serious questions about the reliability of traffic assumptions that do not clearly account for the existing use of rural roads by farming families and local communities. This is particularly relevant to Thunderbolts Way, Staces Road, Salisbury Plains Road and other roads servicing the proposed energy hubs. The amended SEARs require assessment of traffic generation, road condition, safety, cumulative impacts and appropriate mitigation measures. Require that the Department require EnergyCo to provide a detailed, road-specific and time-of-day assessment identifying actual construction vehicle movements, including heavy vehicle deliveries, workforce traffic, additional earthworks movements and interactions with existing agricultural and school bus traffic. This assessment must demonstrate how farming operations, residential amenity, property access and road safety will be protected, with necessary passing bays, road upgrades, traffic restrictions and mitigation measures identified, funded and implemented before construction traffic increases.

An additional quantitative omission also requires resolution: Sections 6.2.4 (printed p. 73) and 6.5.3 (printed p. 92) provide for an additional ten heavy vehicle movements per hour where local cut-and-fill imbalances or further earthworks occur. The EIS should specify the affected work fronts, roads, duration and hours of

these additional movements, and show unambiguously whether they are included in or additional to Tables 6-12 and 6-16, rather than leaving residents and road authorities unable to test the genuine hourly heavy-vehicle burden.

Further evidence and assessment gap. The spoil-removal assumption in Technical Report 7, §6.5.3 (printed p. 92), expressly anticipates an increase of approximately 10 heavy-vehicle movements per hour at more challenging work fronts where cut-and-fill balance cannot be achieved. It does not provide an accessible work-front-by-work-front schedule stating where excavated material will go, whether the additional allowance is already reflected in published camp allocations, what vehicles and loaded axle weights are expected, what roads carry laden and empty return movements, or whether temporary stockpiles, quarry inputs and approved disposal sites have been included. Destination uncertainty prevents meaningful pavement, agricultural-access, dust, erosion, waterway and cumulative traffic assessment; repeated heavy movements on narrow roads must be treated as a location-specific constraint.

> POSITION SOUGHT

Reconcile Camp 5 and other work-front daily and hourly traffic figures, including whether the allowance for extra cut-and-fill truck movements is additional to published totals. Assess simultaneous work fronts and the agricultural and community access consequences at the highest local exposure periods.

Additional requirement by EnergyCo. Produce a material-balance and spoil-haulage register with source work fronts, volumes, destination and licence/approval status, selected haul roads, truck and axle configurations, laden and empty two-way movements, peak hourly and daily rates, dates and contingency destinations; reconcile the additional 10 HVE/hour conditional allowance against Tables 6-12 and 6-16 and the entire cumulative model.

13 | Non-high-risk OSOM and Special Purpose Vehicle movements – Section 6.5.7

Evidence and EIS shortcomings

A key concern is the completeness and reliability of EnergyCo's assessment of Oversize Overmass (OSOM) vehicle movements in Section 6.5.7, pages 94–95, of Technical Report 7 – Traffic and Transport Impact Assessment. EnergyCo identifies 53 one-way high-risk OSOM movements associated with the transportation of major electrical infrastructure components. However, the report expressly acknowledges that additional components will be transported as OSOM loads that do not meet the high-risk classification, without providing a corresponding breakdown of their numbers, dimensions, weights, routes or anticipated frequency. Section 5.4.2 acknowledges the use of Special Purpose Vehicles, including mobile cranes, drill rigs and concrete pump trucks, yet the report does not clearly identify how many movements of these vehicles are anticipated or how they have been incorporated into the overall traffic assessment. The figure of 53 high-risk OSOM movements must not be presented or interpreted as representing the total number of oversize, overmass and specialised heavy vehicle movements required to construct this project. Of particular concern, Transport for NSW's amended advice dated 11 February 2026 specifically requests a description of all non-high-risk OSOM vehicles and the materials to be transported, together with relevant routes and operating requirements. I therefore question whether EnergyCo has adequately demonstrated the full extent of heavy vehicle impacts on Thunderbolts Way, Staces Road, Salisbury Plains Road and other rural

construction routes. These roads have existing constraints, including narrow carriageways, limited passing opportunities, restricted sight distances and intersections requiring upgrades, while continuing to service farming families, livestock transport, agricultural machinery, school buses and local residents. The Department should require EnergyCo to provide a complete, itemised register of all anticipated high-risk and non-high-risk OSOM movements, together with Special Purpose Vehicle movements, including vehicle configurations, dimensions, gross masses, axle loadings, estimated trip numbers, delivery schedules, nominated routes and required road approvals. EnergyCo must also demonstrate where these movements have been included in its existing heavy vehicle forecasts and whether the proposed road upgrades, passing bays and intersection treatments are adequate for the full range of vehicles proposed. Without this information, neither the Department nor the affected community can confidently determine whether the EIS has accurately assessed the cumulative traffic burden, road safety risks, pavement deterioration and disruption that construction will impose on rural roads. These matters should be satisfactorily addressed before project determination rather than deferred to future transport planning and permitting.

> POSITION SOUGHT

Publish a complete register and movement forecast for non-high-risk OSOM and all relevant Special Purpose Vehicles, including mobile cranes, drill rigs and concrete pumps, by configuration, mass, axle loading, route, timing and total loaded/return movements; demonstrate their inclusion in the traffic and structural assessments.

14 | Unreconciled construction traffic calculations and workforce distributions – Tables 6-16 and 6-17

Evidence and EIS shortcomings

A key concern is the accuracy, consistency and transparency of the construction traffic calculations presented in Technical Report 7, Tables 6-16 and 6-17 (printed p. 96). Although the combined forecast of 3,668 daily two-way vehicle movements agrees with the main EIS, Table 6-16 omits workforce and vehicle movement totals, and the assumptions underpinning Table 6-17 have not been clearly reconciled. Section 6.5.2 refers to approximately 1,200 camp-based workers, whereas Table 6-16 identifies 1,250; Section 6.5.4 assumes 200 local workers travelling at two workers per vehicle, suggesting approximately 100 one-way trips if each travels to the site once, whereas Table 6-17 forecasts 127 one-way local workforce vehicle movements without explaining the difference. The allocations among Armidale, Muswellbrook, Tamworth and Scone also appear inconsistent with Table 6-13, while the statement in Section 6.5.3 of approximately 22 light-vehicle movements per hour for each of Camps 1–4 does not reconcile with their respective daily totals, which imply approximately 22, 27, 32 and 36 movements per hour over the stated ten-hour distribution period. These matters must be resolved because peak-hour and route allocation assumptions directly inform intersection design, road safety and assessments of impacts on residents. EnergyCo also does not separately identify the origins of workers from Uralla, Walcha, Guyra and surrounding rural areas, leaving uncertainty about the burden placed on Thunderbolts Way, Staces Road, Salisbury Plains Road and other local roads used by school buses, stock trucks and agricultural machinery. Consistent with the amended SEARs, I request that the Department require EnergyCo to correct the missing totals, reconcile Tables 6-13, 6-16 and 6-17 with the main EIS, disclose the underlying traffic-generation and origin–destination calculations, and provide auditable road-by-road and hour-by-hour forecasts before determining the project.

Further evidence and assessment gap. A further significant traffic-input issue arises in the main EIS, §3.3.13.1 and Table 3.11 (printed pp. 137–138). The EIS estimates approximately 2,400 ML of construction water demand: about 360 ML potable (340 ML for workers and 20 ML for concrete) and 2,040 ML non-potable (1,751 ML for water carts, 17 ML for biosecurity wash stations and 272 ML for camp maintenance). The main EIS expressly proposes a hierarchy of sources, including captured runoff, reuse, licensed supplies, extraction and imported trucked water, and states that water may be piped or transported by tanker and that water-haulage traffic has been accounted for in the traffic assessment. It would therefore be incorrect to assume that all 2,400 ML must arrive by road. However, a total water-demand figure is not a transparent vehicle forecast: there is no consolidated, independently checkable schedule showing each source, destination, water-cart or tanker size, road choice, loading and empty return journey, seasonal delivery period and frequency by camp or work front, or reconciling those movements to Technical Report 7 §§6.5–6.6 and Tables 6-12–6-17.

Further supporting evidence. A separate gap concerns wastewater and solid-waste disposal. The main EIS project description (Table 3.3, printed p. 66) and Chapter 23's construction-waste account provide for camp wastewater treatment, reuse of suitable treated water for dust suppression and transport of remaining wastewater, concrete washout residues and general waste by authorised contractors to approved off-site facilities. The assessment should disclose actual or scenario volumes, receiving-facility capacity, scheduled collection frequency, likely destinations, incident-spill controls and two-way loaded/empty vehicle movements rather than assuming such trips are already immaterial in workforce and construction movement totals. Because source and facility choices may be deferred, credible high-volume and long-haul sensitivity cases are needed before the road assessments can be relied on.

Additional whole-of-project evidence — quarry products and material movements. The main EIS, §3.3.13.3, Table 3.12 (printed p. 140), estimates 1,250,000 m^3 of quarry products for transmission towers and lines, 39,000 m^3 for energy hubs and 445,000 m^3 for ancillary infrastructure: a project-wide total of 1,734,000 m^3. Indicative source regions are the Hunter and New England. The main EIS also anticipates imported engineered fill and pavement materials at energy hubs (§3.3.11, printed pp. 135–136) and the delivery, processing and onward distribution of material through crushing and screening sites for access tracks, tower pads and other works (§3.3.12.1, printed p. 136). These quantities span the whole project, including the Bayswater-to-Uralla corridor and its feeder roads; they must not be treated as if every load travels the whole corridor or necessarily uses a public road. Nevertheless, their scale requires a traceable account of external quarry deliveries, on-site reuse and processing, transfers between construction areas, and loaded and empty truck movements on each affected road.

Unreconciled traffic assumptions and water transport. Technical Report 7, §4.3.2 (printed p. 28), adds only an indicative 16 two-way heavy-vehicle movements per day for miscellaneous regional material deliveries, based on a 5% assumption; §6.2.4 (printed p. 73) allows an additional 10 heavy-vehicle movements per hour for residual spoil and material redistribution where cut-and-fill cannot be balanced. Section 6.5.3 and Table 6-12 (printed p. 92) forecast construction heavy-vehicle movements and expressly mention bulk deliveries and water carts, but do not separately reconcile these broad allowances to the EIS quarry-material volumes, proposed source quarries, vehicle payloads, haulage distances, individual road links and stage-specific peaks. The main EIS also estimates 2,400 ML of construction water (Table 3.11, printed p. 138), including 1,751 ML for water carts, and states that tanker or pipeline water transport has been considered in the traffic assessment (§3.3.13.1, printed p. 139). That assertion still requires an auditable source-to-work-front breakdown. Some material and water may be sourced, reused, processed or transferred within the project area; the deficiency is the absence of a transparent reconciliation demonstrating which movements are actually included in the forecasts, not proof that all movements were omitted.

Illustrative scale and whole-of-network consequence. For scale only, 1,734,000 m^3 would represent 86,700 loaded deliveries at an assumed 20 m^3 per truck, or 173,400 one-way vehicle movements if every delivery required a separate empty road return. This is a sensitivity illustration, not a forecast: actual movements may be lower or higher according to on-site supply, load limits, route choice and construction timing. Under the amended SEARs (Transport, printed p. 4), the Department requires assessment of peak and average heavy-vehicle traffic, public-road condition and safety, cumulative traffic, haulage-route upgrades and road-maintenance contributions. Without a documented material-and-water haulage reconciliation across the entire Bayswater-to-Uralla project transport network, the Department cannot independently test whether predicted heavy-vehicle volumes, intersection designs, bridge and culvert loading, pavement deterioration, rural school bus safety, agricultural freight and property access impacts are adequately represented.

> POSITION SOUGHT

Position sought

Correct Tables 6-16 and 6-17 and reconcile workforce assumptions, camp totals, vehicle occupancy, origins and destinations against Tables 6-11 to 6-13 and the main EIS. Supply a transparent calculation workbook or equivalent auditable method, with corrected route-specific peak-period forecasts.

Additional requirement by EnergyCo. Publish an auditable water-and-waste transport reconciliation tied to Table 3.11, Chapter 23 and Technical Report 7 Tables 6-12–6-17: identify trucked versus piped/on-site water, agreed suppliers and licences, capacities of tankers and waste vehicles, two-way trips, route assignments, road condition, drought contingencies and peak operations; identify receiving wastewater and waste facilities and integrate any changes into cumulative road deterioration, intersection, school transport and agricultural access assessments.

Additional whole-of-project requirement by EnergyCo. Before determination, EnergyCo must publish an independently auditable, project-wide materials-and-water haulage schedule cross-referencing main EIS Tables 3.11–3.12 and Technical Report 7 §§4.3.2, 6.2.4 and 6.5–6.6 (including Tables 6-12 and 6-16–6-17). For each construction stage and work front, it must identify quarry-product and gravel quantities, imported and reused material, water volumes actually trucked versus piped or sourced on site, confirmed or reasonably modelled sources and destinations, vehicle classes and lawful payloads, loaded and empty trips, haulage roads (including local feeder roads), average and peak daily/hourly movements, overlap with other developments, and the calculations showing where each movement is already counted. It must then reassess and disclose any consequent changes to intersection and road-capacity modelling, road and bridge/culvert safety, pavement wear, school buses, agricultural operations, biosecurity, dust and noise, and specify funded preventative upgrades, maintenance contributions, delivery responsibilities and completion dates before haulage begins. Where sources or routes are undecided, EnergyCo must assess credible high-volume and long-haul scenarios rather than defer material traffic impacts to a later management plan.

15 | Rowan Avenue 15-tonne load restriction and inconsistent construction traffic distribution – Section 6.6

Evidence and EIS shortcomings

A key concern is Section 6.6.1 (printed p. 97) of Technical Report 7 – Traffic and Transport Impact Assessment, which nominates Rowan Avenue and Duke Street as an alternative construction route if the Staces Road–Thunderbolts Way connection is unavailable. How can EnergyCo nominate Rowan Avenue without acknowledging or addressing the 15-tonne Gross Vehicle Mass restriction identified for the road? On 5 August 2025, Uralla Shire Council's Local Transport Forum recommended a 15-tonne Gross Vehicle Mass limit between Bridge Street and Duke Street in response to concerns about heavy vehicles using this residential street, damage to road and water infrastructure, and local amenity. I understand that a 15-tonne restriction currently applies, and request formal confirmation from Council of its implementation, scope and any exemptions. Nevertheless, Technical Report 7 does not clearly identify the vehicle classes, maximum loaded masses, dimensions or hourly and daily movement numbers proposed to use Rowan Avenue, or demonstrate that any heavy construction vehicles would comply with that restriction. The report also contains inconsistent morning traffic assumptions: Section 6.3 (printed p. 76) identifies workforce movements to sites from 6:00 am to 7:00 am, whereas Sections 6.5 and 6.6 adopt a 5:30 am to 6:30 am project morning peak. Section 6.6.1 states that the worst-case contingency scenario was assessed via Salisbury Street; this does not establish that Rowan Avenue is suitable as an alternative route, particularly for heavy vehicles on a constrained residential street. Section 6.7.4 (printed pp. 112–113) proposes no intersection upgrades for the through-Uralla contingency beyond traffic management. The amended SEARs require assessment of the condition and capacity of public roads, road safety, site access, intersection performance and necessary mitigation. Require that the Department require EnergyCo to obtain written confirmation of Rowan Avenue's current legal load limit from Uralla Shire Council; disclose all proposed vehicle types, gross masses, routes and movement frequencies; and provide a route-specific pavement, infrastructure, intersection and road-safety assessment, including early-morning residential noise, school buses, pedestrian safety, property access and cumulative traffic impacts. A restricted residential street must not be treated as a suitable alternative haulage route simply because the regional road network has spare traffic capacity. These matters must be addressed before project determination, with any necessary safeguards implemented before construction traffic commences.

> POSITION SOUGHT

Seek written confirmation from Uralla Shire Council about the status and limits of the proposed or existing Rowan Avenue 15-tonne restriction and any exemptions. Publish the alternative-route vehicle classes, axle and gross masses, access approvals, resident and school-bus safety assessment, and a compliant contingency route.

16 | Incomplete construction traffic distribution summary – Section 6.6.3

Evidence and EIS shortcomings

A key concern is the accuracy, completeness and reliability of Section 6.6.3, printed page 101, of Technical Report 7 – Traffic and Transport Impact Assessment. Section 6.6.3 identifies Camp 5 as accommodating approximately "0 workers", despite Table 6-16 identifying 425 peak construction workers and Table 6-3 providing an indicative camp capacity of 550 people. the summary identifies approximately 1,100 daily vehicle movements associated with Camp 5, without explaining that Table 6-16 and the main EIS, Table 3.6, identify 1,316 daily two-way movements when workforce transport is included. Similarly, the summary suggests that Camp 4's co-location with Central South Hub reduces reliance on public roads, yet Table 6-16 forecasts 566 daily two-way movements associated with this camp, without clearly distinguishing internal site movements from traffic using public roads. Of particular concern, EnergyCo repeatedly concludes that construction traffic impacts will be temporary, localised and manageable, while failing to adequately demonstrate what these substantial movements will mean for individual roads and the communities required to share them. Section 6.6.3 also suggests that alternative construction routes would reduce reliance on local roads if the Staces Road connection is unavailable, despite Section 6.6.1 specifically identifying Rowan Avenue, Duke Street and Salisbury Street as alternative routes through Uralla. This is especially concerning given Uralla Shire Council's recommendation for a 15-tonne Gross Vehicle Mass restriction on Rowan Avenue. Additionally, Table 6-18 identifies approximately 200 workers during enabling works but states that this period was not further assessed. These omissions are particularly difficult to reconcile with EnergyCo's own EIS findings, including Section 13.5, which acknowledges that temporary disruption to cropping and grazing remains a high-risk activity after mitigation, and Section 16.3.6, which predicts noticeable traffic noise increases on all local roads and exceedances of the relevant road traffic noise criteria at 111 residential receivers. The amended SEARs require assessment of peak and average traffic generation, road capacity and condition, safety, cumulative impacts and appropriate mitigation. Require that the Department require EnergyCo to correct Section 6.6.3 and provide a fully reconciled, independently verifiable, camp-by-camp and road-by-road traffic assessment, identifying all light, heavy and specialised vehicle movements, their actual routes, peak operating times, impacts on school buses, agricultural operations, residential amenity and property access, together with the road upgrades and mitigation measures required before construction commences. Particular attention must be given to Thunderbolts Way, Staces Road, Salisbury Plains Road and the alternative routes through Uralla. The fact that construction impacts may be temporary does not make them insignificant, nor does a conclusion that regional roads have sufficient traffic capacity establish that the safety, amenity and agricultural operations of affected rural communities will be adequately protected. These deficiencies must be resolved before project determination rather than deferred to future traffic management plans.

> POSITION SOUGHT

Correct the missing or inconsistent camp and movement descriptions in §6.6.3, including Camp 5 and Camp 4, and reconcile construction-only, workforce and total trip figures. Reissue the road-by-road trip distribution assumptions and affected-route impacts.

17 | Missing before-and-after traffic comparison – Figures 6-17–6-19

Evidence and EIS shortcomings

A key concern is the transparency, completeness and reliability of the construction traffic distribution assessment presented in Figures 6-17, 6-18 and 6-19 (Technical Report 7, printed pp. 106–107). These figures illustrate the distribution of additional construction traffic during peak construction, but do not provide a clear, direct comparison between existing traffic volumes and the total traffic that residents will be required to accommodate during construction. While Section 6.7.3 and Appendix F compare forecast 2030 traffic without the project with forecast 2030 traffic during peak construction, the figures are expressed primarily in passenger car units and road-capacity classifications rather than an accessible road-by-road breakdown of actual vehicle numbers, vehicle types and percentage increases. For example, Table F-2 identifies an increase from 61 to 186 passenger car units per lane per hour in one direction on the New England Highway north of Glenburnie Road—approximately 205%—while still classifying that road section as Level of Service A. Additional increases are forecast on sections of Thunderbolts Way without any change in their Level of Service classification. The ability of a road to accommodate additional vehicles without congestion does not establish that its pavement can withstand sustained heavy vehicle movements or that increased risk, noise and disruption to farming families and other residents are acceptable. Of further concern, Appendix A and Appendix F appear to apply inconsistent road identifiers, including M-42, M-45 and M-47, making it difficult to independently verify which road segments have been assessed. Appendix A also identifies a monitoring location on Thunderbolts Way south of Salisbury Plains Road (M-16), but the matching before-and-after comparison is not readily identifiable in Table F-2. The amended SEARs require assessment of peak and average traffic generation, road capacity and condition, safety, cumulative impacts and mitigation. Require that the Department require EnergyCo to publish a corrected and independently verifiable road-by-road comparison showing the actual surveyed 2025 traffic volumes, the forecast 2030 volumes without the project and the total forecast volumes at peak construction, including daily and hourly counts of light and heavy vehicles, the percentage change in each category, and the impact of construction vehicle movements on school buses (including independent private services), agricultural machinery, livestock transport, rural driveways, noise and road deterioration. The comparison must specifically cover Thunderbolts Way, Salisbury Plains Road, Staces Road, Glenburnie Road and alternative construction routes through Uralla, identify each monitoring and modelling location consistently, and set out the physical road upgrades and mitigation required before traffic increases occur. These deficiencies should be resolved before determination rather than deferred to future traffic management plans.

Further evidence and assessment gap. Technical Report 7's LoS analyses must be reconciled with the practical performance of roads used by simultaneous camp traffic and other regional developments. Section 6.7.3 (printed pp. 105–109) states that many roads would continue at LoS A under the construction assumptions, whereas §8.5.2 (printed pp. 153–154) identifies deterioration to LoS B or C at some lower-capacity rural locations, including Barry Road and Forest Way. Even if both outputs are internally consistent because they describe different modelling cases, they do not describe the duration and number of forced stops behind slow OSOM combinations on winding gradients, traffic-controller queues, hazardous passing on narrow verges, or winter visibility reductions. Capacity and free-flow grades should be supplemented with operating-speed, queue, route reliability and physical conflict tests, rather than presented alone as evidence of acceptable impacts.

> POSITION SOUGHT

Position sought

Publish a clear, road-by-road comparison of observed 2025 traffic, forecast 2030 traffic without the project and peak project traffic, including daily and peak-hour actual vehicles, heavy-vehicle counts, percentage growth and directional splits; reconcile Figures 6-17–6-19 with Appendix F.

Additional requirement by EnergyCo. Publish a side-by-side segment and time-period comparison of baseline, project and cumulative LoS results, PCU assumptions, heavy-vehicle composition, speed and queue changes and road-width constraints for critical rural routes; include sensitivity scenarios with delayed departures, tourist and livestock freight peaks, snow/ice closures and multiple work fronts.

18 | Specific failure to address concentrated Thunderbolts Way construction traffic and prior Salisbury Plains mitigation — Figure 6-17

Evidence and EIS shortcomings

Figure 6-17 of Technical Report 7 (printed p. 106) appears to identify 492 daily construction traffic movements on the route south of Uralla towards Central Hub B, apparently along Thunderbolts Way. The accompanying discussion of 'Capacity and Existing Traffic volumes' and 'Broader impacts' (printed pp. 107–108) does not expressly reconcile that figure to a road-specific baseline, total daily traffic, heavy-vehicle share, hour-by-hour exposure, school bus interactions or property access and road safety mitigation for Thunderbolts Way and the Salisbury Plains community. Although Appendix F assesses some road segments using 2030 passenger-car-unit (PCU) values, no transparent schedule has been provided in the reviewed Table F-2 that traces the mapped 492 movements to each affected segment, including monitoring location M-16 south of Salisbury Plains Road. EnergyCo must confirm the exact mapped road link, count definition and extent of the 492 movements rather than leaving affected residents to infer these from a map.

This omission is substantially more serious because EnergyCo was formally notified of these very foreseeable impacts in the community document 'Property-Specific Mitigation Measures — Thunderbolts Way, Salisbury Plains and Surrounding Affected Residents', identified as emailed to Doug Parris, Melissa Maurer, Aaron Davies, Andrew Firmstone, Frank Andreatta and Tommy Griffiths on 5 September 2026. That submission identified 17 properties or resident groups and set out specific requests for safer rural driveway access, turning and lay-by treatments at Gap Road and individual properties, school bus lay-bys for affected households, heavy-vehicle and OSOM braking noise including Salisbury Hill, road and drainage protection, livestock and agricultural operations, and direct household consultation and mitigation before exposure. The subsequent cross-reference correspondence of 17 October 2026 records acknowledgements and follow-up communications but does not establish that each measure was resolved. The EIS cannot responsibly characterise such impacts as merely 'localised' or 'manageable' without showing how the prior written warnings were incorporated into its calculations, designs and property-specific decisions.

The failure to explain the mapped traffic burden is particularly troubling when the report provides a corridor-specific assessment of approximately 200 peak-hour construction movements for Glenburnie Road and the New England Highway but does not provide comparable analysis of the route shown towards Central Hub B. Remaining at Level of Service A is an assessment of capacity and delay; it does not establish safe coexistence with school buses, independently operated school services, livestock trucks, farm machinery, narrow

shoulders, private driveways or existing road defects. The main EIS's prediction of no more than 2 dB additional traffic noise on Thunderbolts Way south of Uralla (EIS §16.3.6, printed p. 612) similarly requires transparent reconciliation with the mapped route-specific daily volume and its heavy-vehicle, engine-braking and early-morning components.

I request that the Department require EnergyCo, before determination, to identify in writing the exact Thunderbolts Way road sections represented in Figure 6-17; reconcile the apparent 492 daily project movements to underlying model links, existing surveyed 2025 conditions, 2030 baseline and peak-construction movements; show actual daily and hourly light, shuttle-bus, heavy, SPV and OSOM traffic by direction and construction stage; and disclose the road pavement, shoulder, bus-stop, driveway, sight-distance, acoustic and farm-access assessments and required upgrades. EnergyCo must also produce an auditable property-by-property response register for the 5 September mitigation submission, identifying each household contacted, the requested mitigation accepted or rejected, objective reasons, named responsible decision maker, works funding, timing and completion dates. Where the EIS was completed before a particular submission reached its technical authors, EnergyCo should identify a supplementary assessment and provide residents a meaningful opportunity to review it. The original mitigation document is enclosed as an evidence attachment; its household-sensitive content should be handled confidentially unless the affected persons consent to publication.

Additional evidence — unassessed motorcycle tourism and recreational road users. The main EIS, Chapter 11 (landscape character assessment, printed pp. 420–424), identifies Thunderbolts Way as Tourist Drive 21. Technical Report 7, §5.1.2 (printed p. 49), acknowledges that Thunderbolts Way connects Uralla and Walcha toward the Mid North Coast, carries tourism traffic and includes constrained bends, gradients, sight distances and narrow shoulders. Walcha tourism information expressly promotes Thunderbolts Way for motorcycling between the Gloucester/Mid North Coast area, Walcha and Uralla and describes motorcycle touring groups as a common visitor presence. The road therefore serves visiting riders and the businesses they support, as well as residents, farm vehicles and freight. Technical Report 7, §4.4.2 (printed p. 30), records seven-day midblock counts, but its detailed turning surveys targeted weekday AM/PM peaks; the EIS does not separately demonstrate whether motorcycle-group, weekend, holiday and seasonal visitor peaks were captured or tested in the projected Thunderbolts Way construction-traffic scenarios.

Additional evidence — recent fatal motorcycle crash and limitations of historical crash data. NSW Police confirmed that at approximately 12:30 pm on Monday 18 May 2026 a motorcycle left Thunderbolts Way at Uralla and its 70-year-old rider died at the scene; police commenced an investigation and indicated that a report would be prepared for the Coroner. The cause of that incident must not be assumed, and it is not alleged to have been caused by the project. Nonetheless, it is a documented, recent fatality on the project-affected road that warrants explicit consideration in any road-safety assessment. Technical Report 7, §4.4.3 (printed p. 32), relies on a 2020–2024 crash-history dataset, while Appendix C (printed p. 214) separately records motorcycle involvement in serious bend-related crashes in the Uralla and Walcha local government areas. Those LGA-wide figures should not be misrepresented as crashes specifically on Thunderbolts Way. The May 2026 fatality postdates the dataset and should be examined with current crash information before project determination.

Assessment deficiency — motorcycle and heavy-vehicle interactions. Technical Report 7, §6.7.11 (printed pp. 127–128), recognises organised bicycle events and proposes event consultation, traffic controls and scheduling to limit cyclist conflicts, yet it provides no equivalently specific analysis of motorcycle tourism or touring-group exposure on Thunderbolts Way. The assessment has not demonstrated the risks from project trucks entering or leaving access roads, slow heavy vehicles on curved sections, overtaking and following conflicts, gravel and surface deterioration, temporary road closures and OSOM rolling stoppages during weekend and holiday riding periods. An acceptable Level of Service is not, on its own, evidence that these interactions are safe or that visitor access and tourism businesses will be unaffected. The amended SEARs

(Transport, printed p. 4) require assessment of road safety, peak and average traffic, cumulative impacts and appropriate mitigation.

Additional sources for motorcycle-tourism and fatal-crash evidence: EnergyCo, main EIS Chapter 11, Tourist Drive 21/landscape character (printed pp. 420–424); Aurecon, Technical Report 7, §§4.4.2–4.4.3 (printed pp. 30–32), §5.1.2 (p. 49), §6.7.11 (pp. 127–128) and Appendix C (p. 214); NSW Police Force, "Fatal motorcycle crash – Uralla", 18 May 2026, https://www.police.nsw.gov.au/news/news_article?sq_content_src=%2BdXJsPWh0dHBzJTNBJTJGJTJGZWJpenByZC5wb2xpY2UubnN3Lmdvdi5hdSUyRm1lZGlhJTJGMTI1MjY0Lmh0bWwmYWxsPTE%3D; Walcha Visitor Information Centre, "Motorcycling", https://walchansw.com.au/motorcycling/, and "Touring Routes in the Region", https://walchansw.com.au/portfolio/touring-routes-in-the-walcha-region/; amended SEARs (Transport, p. 4).

> Sources: Aurecon, Technical Report 7 (Revision 0, 28 September 2026), Figure 6-17 and §6.7.3 (printed pp. 105–109), Table 6-19 (printed p. 110), Table 6-20 (printed p. 112), Appendix A, Table A-3 (printed p. 189) and Appendix F, Table F-2 (printed pp. 221–226); EnergyCo, main EIS §14.3.7, §16.3.6 (printed pp. 565–566 and 612–613) and mitigation TT17–TT23; Amended SEARs (Transport, p. 4); community mitigation submission identified as emailed to EnergyCo 5 September 2026; EnergyCo mitigation cross-reference dated 17 October 2026.

Confidential evidence identified for separate lodgement: Attachment A is the original 5 September 2026 community mitigation submission; Attachment B is the 17 October 2026 EnergyCo mitigation and EIS cross-reference letter. Both are referenced in this public edition but are not reproduced here. They should be provided separately to the assessment authority under appropriate confidential handling arrangements.

> POSITION SOUGHT

Verify the apparent 492 daily movements shown on Figure 6-17 against the correct Thunderbolts Way road segments and forecast period. Publish baseline and combined traffic exposures and give an itemised, property-specific written response to the 5 September 2026 community mitigation requests, with approved, funded measures.

Additional requirement by EnergyCo — Thunderbolts Way motorcycle tourism and recent fatality. Before determination, EnergyCo must update the Thunderbolts Way road-safety evidence to account for the confirmed 18 May 2026 fatal motorcycle crash, obtain the latest available crash records, and undertake a motorcycle-specific, tourism-sensitive assessment of affected route sections. It must disclose and test baseline and project-plus-cumulative conditions for weekends, public holidays and busy touring periods; identify motorcycle volumes and touring-group patterns, heavy-vehicle interactions, queues and OSOM stoppages, restricted overtaking, sight distance, intersection and driveway conflicts, road-surface condition, emergency access and likely impacts on local tourism businesses. EnergyCo must consult Uralla and Walcha councils, tourism operators and relevant motorcycle organisations; specify independently checkable, funded physical and operational safety controls, including safe haulage scheduling and road maintenance, with accountable delivery dates before the relevant construction traffic commences. Any conclusions must distinguish route-specific evidence from broad LGA crash figures, and must not attribute the 2026 fatality to project traffic.

19 | Failure to provide consistent intersection designs and demonstrate road safety compliance across the entire construction route

Evidence and EIS shortcomings

A key concern is the accuracy, consistency and adequacy of EnergyCo's intersection safety assessments and proposed road upgrades across the entire New England Renewable Energy Zone Network Infrastructure Project, as presented in Section 6.7.4, Section 9 and Appendix G of Technical Report 7 – Traffic and Transport Impact Assessment. Cross-referencing the main intersection upgrade schedule with Appendix G reveals material discrepancies, including IS_USC_09 (Thunderbolts Way/Salisbury Plains Road), where the main report identifies a Basic Left Turn (BAL) treatment while Appendix G specifies an Auxiliary Left Turn (AUL);

IS_USC_16, where a Channelised Right Turn (CHR) and AUL treatment is identified in the main schedule but Appendix G specifies only BAL and Basic Right Turn (BAR) treatments; and IS_USC_22, where the main schedule identifies CHR while Appendix G specifies CHR and AUL. several intersections, including IS_USC_13, IS_USC_14, IS_USC_17 and IS_USC_45, have recorded sight distances below the report's stated requirements, raising serious questions about whether proposed treatments will adequately address existing road safety deficiencies when construction traffic increases. These discrepancies are particularly concerning where narrow rural roads must accommodate heavy construction vehicles alongside school buses, agricultural machinery, livestock transport, local residents and vehicles entering or leaving private properties. The amended Secretary's Environmental Assessment Requirements (SEARs) require assessment of road safety, intersection performance, road condition, cumulative impacts and necessary road upgrades. Transport for NSW's amended advice dated 11 February 2026 specifically requests intersection turning assessments, safe intersection sight-distance assessments, vehicle swept-path analysis and strategic concept designs. EnergyCo must therefore demonstrate that every proposed construction intersection and access point has been assessed against the actual forecast traffic volumes, largest anticipated vehicle configurations, existing road geometry and relevant agricultural and community activities. The Department should require EnergyCo to undertake a comprehensive independent reconciliation of every intersection identified in Section 9, Appendix G and the associated design drawings, including confirmation of the correct intersection identifiers, proposed treatments, applicable design standards, identified safety deficiencies, required corrective works, responsible road authority and construction completion dates. Where deficiencies exist, EnergyCo must provide engineering evidence demonstrating that the proposed works will achieve safe operating conditions before those intersections are subjected to substantial construction traffic. It is not acceptable to defer the resolution of conflicting intersection designs and known road safety deficiencies to future construction traffic management plans, particularly where the consequences of inadequate assessment will be borne by rural families, schoolchildren, farmers and other road users who have no choice but to continue using these roads. These matters should be satisfactorily resolved before project determination, with necessary safety upgrades required before the relevant construction movements commence.

I raise further serious concerns regarding the non-compliant intersections and construction access points identified in EnergyCo's own Technical Report 7 – Traffic and Transport Impact Assessment, particularly on roads forming part of the proposed Oversize Overmass (OSOM) transport network between the Bayswater/Muswellbrook area and Walcha via Tamworth and Uralla. Appendix G, Table G-1, identifies existing sight-distance deficiencies at several locations on the relevant roads, including IS_TRC_17.A on the New England Highway and IS_USC_16 and IS_USC_17 on Thunderbolts Way. At IS_USC_17, the report records only 70 metres of available sight distance looking south against a stated requirement of 260 metres. Section 6.7.5, Table 6-21, also identifies multiple OSOM turning locations and road treatments along the Muswellbrook and Tamworth detours, Staces Road and the Uralla–Walcha corridor, some of which rely on separately proposed road upgrades. These are different types of identified constraint: not all locations requiring an upgrade are expressly classified as non-compliant for sight distance, and not every access point is an intersection at which an OSOM convoy will turn. Nevertheless, identifying proposed works does not demonstrate that every affected junction will meet the necessary safety and operating standards before relevant construction movements commence.

These unresolved or inadequately demonstrated intersection arrangements become particularly concerning when considered alongside the cumulative assessment issues identified in Section 38, and the potential underestimation of specialised vehicle movements addressed in Section 38.1, of this submission. Technical Report 7, Chapter 8, Table 8-1, does not separately identify five substantial publicly registered proposals — Balala Wind Farm (SSD-143456490), Hillview Solar Farm (SSD-72447960), Hillview Wind Farm (SSD-78329994), Eastern Hub Firming Battery (SSD-71860708) and Deeargee Solar Farm (SSD-70753725). If some of these projects proceed with overlapping construction periods and shared haulage routes, their additional

heavy vehicle, Special Purpose Vehicle (SPV) and OSOM movements could materially increase turning demands, waiting times, road wear and exposure to safety risks at constrained or already deficient junctions. Their actual haulage routes, construction programs and traffic volumes must be established rather than assumed. The Department should require EnergyCo to provide a comprehensive, independently reviewable intersection-by-intersection compliance and upgrade register for the full proposed Bayswater/Muswellbrook–Walcha haulage network, with existing and proposed sight distances, largest design vehicles and swept paths, cumulative traffic sensitivity scenarios, required physical works, road authority consents, responsible delivery parties, secured funding and completion dates.

Supporting comparison table — identified intersection discrepancies

Interpretation: The first three rows are direct conflicts between scheduled treatments; other rows identify location-numbering, traceability or documented sight-distance issues. A recorded existing deficiency does not, on its own, establish that a final engineered upgrade would be non-compliant. EnergyCo must demonstrate how it will be resolved.

> Supporting references: Technical Report 7, §6.7.4 (printed pp. 109–114), §9 and Table 9-2 (especially pp. 177–178), Appendix G (especially pp. 261–264), Appendices H and K; amended SEARs (Transport, p. 4); TfNSW amended advice of 11 February 2026, Attachment A (pp. 2–6); Uralla Shire Council scoping advice of 4 February 2026 (pp. 1–2). Additional route-wide intersection references: Technical Report 7, §6.4.2, §6.7.5 and Table 6-21 (printed pp. 116–118), Appendix G, Table G-1 (printed pp. 255 and 262–263), Chapter 8 and Table 8-1; Sections 38 and 38.1 of this submission.

> POSITION SOUGHT

Publish a corrected whole-of-route intersection compliance register for each construction access, detour and OSOM turn, reconciled to the relevant drawing and GPS location. Show existing and proposed ASD/SISD, design vehicle swept paths, forecast cumulative turning volumes, remedial works, funding, road authority endorsement and completion before relevant haulage.

Intersection design comparison — retained from full master

Intersection / location	Section 9 main schedule	Appendix G	Documented discrepancy or matter requiring clarification
IS_USC_09 — Thunderbolts Way / Salisbury Plains Road	BAL	AUL	Different left-turn treatments. Appendix G identifies high construction traffic increase and long-term impact.
IS_USC_16 — Thunderbolts Way / access track	CHR + AUL	BAL + BAR	Substantially different turning treatments. Appendix G also records a sight-distance deficiency.
IS_USC_22 — Thunderbolts Way / Bundarra Road	CHR	CHR + AUL	Appendix G adds an auxiliary left-turn treatment absent from the main schedule.
IS_USC_13 / IS_USC_14 — Thunderbolts Way / access tracks	IS_USC_14 listed as North and South	Separate IS_USC_13 and IS_USC_14 entries	Access numbering and treatment-to-location allocation are unclear; both Appendix G records note inadequate approach / intersection sight distances.
IS_USC_17 — Thunderbolts Way / access track	BAL	BAL	No treatment conflict identified; Appendix G records 70 m of south-looking sight distance against a stated 260 m requirement.
IS_USC_45 — Bundarra Road / access track	BAL + BAR	BAL + BAR	No treatment conflict identified; Appendix G records only 30 m approach sight distance against an 80 m requirement.
IS_UHC_37 / IS_UHC_84 — Waverley Road / Camp 2 access	Two separately identified Camp 2 access entries	IS_UHC_84 is identifiable; IS_UHC_37 not separately labelled	Unclear whether both accesses have been individually assessed and matched to design and upgrade schedules.
Camp 3 — Barry Road access	Camp 3 access identified elsewhere in the report	Barry Road / Camp 3 access entry lacks a clear intersection ID	Requires a unique location identifier and cross-reference to its design, sight-distance assessment and upgrade schedule.

20 | Inconsistent and incomplete access assessments for main construction ancillary facilities, workforce accommodation camps and energy hubs — Technical Report 7, Section 6.7.4

Evidence and EIS shortcomings

A key concern is the accuracy, consistency and completeness of EnergyCo's assessment of access to its major construction facilities, workforce accommodation camps and energy hubs, as presented in Section 6.7.4 and Table 6-19 (printed pp. 110–111) of Technical Report 7 – Traffic and Transport Impact Assessment. Cross-referencing the section with the main EIS, Appendix G and the amended Secretary's Environmental Assessment Requirements (SEARs) reveals conflicting access descriptions, incomplete site-specific assessments and documented road-safety constraints that have not been adequately reconciled. Particularly concerning is Table 6-19's identification of the East Hub location as 'Oxley Highway, Walcha', although the main EIS locates East Hub at Hillview Road, Salisbury Plains, with primary construction access via Thunderbolts Way and Salisbury Plains Road; the Oxley Highway location relates to Central South Hub. The access treatment for Camp 3 remains 'to be confirmed' in Technical Report 7, while the main EIS describes possible BAL/BAR treatments and acknowledges that detailed assessment of the Barry location is deferred to an Amendment Report. The proposed alternative Camp 1 location has similarly not received a complete traffic-access assessment in the exhibited EIS. Further inconsistencies arise where Section 6.7.2 identifies CHR/AUL at the Glenburnie Road/Camp 5 access but Table 6-19 and EIS Tables 3.3 and 14.3 describe a driveway at that location; the Camp 4 enabling-works description also uses 'CHL/AUL' while other schedules specify CHR/AUL. These differences require clarification through a single controlling intersection design, rather than being treated as inconsequential terminology. Technical Report 7 Table 6-16 and EIS Table 3.6 identify 1,316 daily two-way movements associated with Camp 5 during peak construction, yet the accompanying discussion elsewhere refers to approximately 1,100 construction movements without transparently reconciling the additional workforce component, public-road movements and turning demands at individual accesses. Appendix G also records sight-distance deficiencies or physical constraints on key approaches, including North Hub, Camp 1 and Camp 2, and identifies a cattle grid on Glenburnie Road immediately beyond the New England Highway intersection that may restrict simultaneous two-way movement and cause queuing. EnergyCo therefore needs to demonstrate, with final engineering evidence, how access treatments will be safe for the actual vehicle mix before significant traffic commences. The amended SEARs require assessments of traffic generation, public-road condition, intersection performance and road safety, while Transport for NSW's amended advice of 11 February 2026 calls for stage-specific turning calculations, sight-distance assessment, heavy-vehicle swept paths, concept designs and a distinct pre-construction works assessment. The report's reliance on temporary traffic controls during enabling works must be reconciled with that advice, including the conditions under which existing accesses may lawfully and safely be used before any required permanent upgrade. These issues must also be assessed against the property-specific mitigation document emailed to EnergyCo on 5 September 2026, which already identified foreseeable risks to rural driveways, school-bus boarding places, agricultural machinery, livestock transport, road shoulders and the need for engineered lay-bys and safe access. EnergyCo cannot reasonably treat these community safety concerns as unforeseen or rely on generic assurances that impacts will be manageable without disclosing how the prior warnings have informed the proposed designs. I request that the Department require an independently verifiable and reconciled access register for every hub, camp and associated ancillary facility, setting out the correct site and intersection identifiers, existing and peak construction movements by stage and vehicle class, full turning and swept-path calculations, current and proposed sight distances, final approved treatment, relevant landholder and road-authority consultation, funding responsibility, and completion and verification dates for each necessary safety measure.

Safety-critical treatments must be implemented before the associated traffic exposure begins. These matters should be resolved to the satisfaction of road authorities, and transparently addressed through the assessment process before determination.

> Supporting references: Technical Report 7, §§6.5–6.7, including §6.7.2 (printed pp. 103–104), §6.7.4 (printed pp. 109–111), Tables 6-16 and 6-19, and Appendix G; main EIS, §§3.2.7, 3.3.5, 3.3.6, 6.10 and 14.3, Tables 3.3, 3.6 and 14.3; amended SEARs (Transport, p. 4); TfNSW amended advice dated 11 February 2026, Attachment A, pp. 2–6; and Attachment A to this submission (community mitigation document emailed 5 September 2026).

> POSITION SOUGHT

Reconcile Table 6-19 with the main EIS, Appendix G and final drawings for every hub and workforce camp; correct inconsistent camp identifiers, access locations and intersection treatments. Demonstrate site-specific turning, sight distance, upgrade requirements and road authority endorsement.

21 | Inadequate categorisation of intersection mitigation measures and reliance on temporary traffic controls — Technical Report 7, Section 6.7.4

Evidence and EIS shortcomings

I formally object to the adequacy and transparency of EnergyCo's method for categorising construction intersections and determining the mitigation measures required to protect public road users. Technical Report 7, Section 6.7.4 (printed p. 109), divides intersections into (a) major ancillary facilities and accommodation camps, described as attracting concentrated and sustained traffic and therefore receiving more detailed assessment, and (b) general intersections and construction access points, described as temporary, intermittent and dispersed, where measures may include signage, access protocols, traffic controllers and local geometric adjustments. While a risk-based distinction is reasonable in principle, the category assigned to an access point cannot itself demonstrate that the road will be safe for construction vehicles, school buses, livestock trucks, agricultural machinery, local residents or people entering and leaving rural driveways.

The primary EIS (Section 14.3.2, printed p. 561, Table 14.2) separately classifies impacts as low, moderate or high according to traffic demand, sight distance, geometry and operating conditions. Mitigation measure TT19 (printed p. 574) likewise provides for engineered treatments at frequently used or permanent accesses, but allows temporary controls at certain low-use or short-duration constrained accesses where those controls are sufficient. These approaches are broadly compatible; the serious deficiency is the absence of a clear, independently verifiable demonstration, location by location, that any proposed basic treatment or temporary control adequately addresses the identified hazard. A temporary increase in vehicles does not make a non-compliant sight distance, high-speed turning movement, narrow shoulder or dangerous school bus stop temporarily safe.

Appendix G itself records examples of inadequate existing approach or safe intersection sight distances and high or long-term construction demand. At the same time, Section 6.7.4 acknowledges that some access points may remain in use throughout construction and that Council-road access points may be retained unless removal is required. General statements that these accesses are dispersed, short-term or do not warrant permanent upgrades therefore require testing against each access's actual duration, vehicle type and predicted turning movements, rather than broad functional labels.

The issue is particularly serious for Salisbury Plains and Thunderbolts Way. The September 2026 community mitigation submission previously notified EnergyCo of foreseeable risks to private driveway access, children using school buses, heavy vehicle braking, narrow road shoulders, stock and agricultural movements, and expressly requested engineered lay-bys and preventative site-specific assessments. Yet the reviewed categorisation and EIS mitigation schedule do not provide a transparent property-by-property decision showing where these risks were accepted, rejected or mitigated, nor that required protections will be in place before substantial construction traffic begins.

This is not a claim that all temporary traffic management is unacceptable or that a turn-warrant threshold automatically mandates a permanent upgrade. It is a request for the engineering evidence, pre-construction timing and accountable decision-making necessary to determine whether EnergyCo's selected treatment is appropriate and safe at every location.

Supporting comparison — categorisation, safety constraints and agency expectations

Classification note: The above distinguishes direct inconsistencies (for example, conflicting treatment types) from unresolved evidence requirements (for example, whether a basic treatment could be made safe by sight-distance works).

Required actions and evidence before determination

Produce a complete intersection-by-intersection register reconciling Section 6.7.4, Section 9, Appendix G, the design drawings and all construction access points, identifying the agreed impact category, final treatment and its engineering rationale.

For each location, disclose 2025 surveyed traffic, relevant 2030 background traffic, peak construction and enabling-works turning volumes, vehicle classes (including heavy and OSOM), largest design-vehicle swept paths, construction duration, and whether use is temporary or permanent.

Provide measured existing and achievable proposed ASD/SISD, specify the works or restrictions used to attain acceptable sight distance, and supply design drawings and road-authority review for every location with an identified deficiency.

Separately assess pre-construction and enabling-works traffic at all accesses, including any overlap with main construction or camp establishment, applying the safeguards sought in TfNSW's 11 February 2026 advice. Identify clearly where temporary traffic control is permitted and where physical works must precede access.

Explain how agricultural harvest and livestock traffic, independent and scheduled school bus routes and stops, rural driveways, and the specific concerns raised in the 5 September 2026 mitigation submission have materially influenced the assessment and final design.

Require delivery of each safety-critical mitigation measure before the relevant substantial construction movement begins, with a published schedule, assigned responsible party, funding source, performance tests and auditable compliance or monitoring triggers.

Provide a written reasons-based determination for each community-requested access, passing or school-bus lay-by treatment; if rejected, identify the alternative engineered safeguard and the evidence establishing that it is safe.

Reason for determination-stage response

The amended SEARs (p. 4, Transport) require assessment of vehicle generation, safety, road and intersection condition, cumulative effects and mitigation, including required upgrade schedules and strategic concept designs. TfNSW's amended advice of 11 February 2026 (Attachment A, pp. 2–6) calls for more granular intersection and pre-construction evidence, particularly for State-road interfaces. The existence of a stated mitigation policy in EIS Table 14.6 is not itself evidence that an identified existing hazard will be corrected at a specific location by a specific date. The Department should require the above reconciliation and an auditable program of works prior to determination, rather than leave material design and community-safety questions to general post-approval traffic management planning.

> Supporting references: Technical Report 7, §2.4 and Tables 2-2–2-3 (printed pp. 15–16), §§6.7.2–6.7.4 (printed pp. 103–113), Section 9 and Appendix G; EIS §14.3.2 and Table 14.2 (printed p. 561), Table 14.6 and measures TT17–TT19 and TT23 (printed pp. 574–575); amended SEARs, Transport p. 4; TfNSW amended advice dated 11 February 2026, Attachment A pp. 2–6; and original community mitigation submission emailed 5 September 2026 (Attachment A below).

Permanent and temporary road disturbance, Inglewood Road and property-specific consultation (Section 45): Aurecon Technical Report 7 §§6.7.2 and 9.3 (printed pp. 103 and 176–182), Tables 9-2 and 9-3 and Appendices G, H and K (IS_MSC_06/IS_MSC_08); main EIS §§3.2, 3.3.5–3.3.6 and 6.4 (including workforce Camp 1 alternative and disturbance-footprint definitions); amended SEARs (7 April 2026), General Requirements, Transport and Engagement (pp. 1–2, 4, 6); TfNSW amended advice (11 February 2026), Attachment A (pp. 3–6).

Scope note: This discrepancy concerns the transparency and sufficiency of exhibited assessment evidence. It does not assert that all identified non-compliances remain uncorrected in a final, as-yet-unverified design. TfNSW advice is cited as agency assessment advice; its specific State-road pre-construction conditions should not be misrepresented as a blanket rule for all local-road activities.

> POSITION SOUGHT

Reassess each intersection currently proposed to rely on temporary traffic controls against its actual geometry, existing sight-distance deficiencies, duration of use and forecast heavy-vehicle turning demand. Publish the reasons and safety evidence for choosing temporary rather than engineered measures, including any required upgrade hold points.

Mitigation categories and agency advice — retained from full master

Assessment issue	Technical Report 7	EIS / agency requirements	Discrepancy requiring response
Two access categories	TTIA §6.7.4: major camps/ancillary sites versus general construction accesses.	EIS Table 14.2: low/moderate/high impacts based on geometry, safety and traffic.	Both schemes can coexist, but no category should substitute for a site-specific risk and turn-treatment assessment.
Use of temporary controls	TTIA §6.7.4 pp. 109, 112: signage, traffic coordination and temporary measures may be used.	EIS TT19 allows controls at selected low-use constrained accesses where demonstrably sufficient.	The report should identify each access, evidence of sufficiency, required site controls and enforcement.
Enabling works before upgrades	TTIA §6.7.2 pp. 103–104 says major construction upgrades not needed during enabling works.	TfNSW amended advice, Attachment A pp. 5–6, seeks stage-specific swept paths, sight distances, traffic figures and restricts temporary controls at State-road accesses before required upgrades.	Provide a site-by-site enabling-works assessment and clarify permitted measures on State roads; do not assume lower volumes equate to safe access.
IS_USC_16 (Thunderbolts Way)	TTIA §9 summary: CHR/AUL; Appendix G: BAL/BAR, high and long-term use with sight-distance deficiency.	EIS high-impact category anticipates higher-order or specific safety improvements where justified.	Conflicting treatment specifications require a definitive design and compliance demonstration.

IS_UHC_84 (Camp 2)	Appendix G: BAL/BAR; existing SISD approximately 150 m and 170 m versus 260 m required; high traffic increase.	EIS TT19 refers to SISD compliance for frequently used accesses.	Explain how the design corrects the visibility deficit before sustained traffic uses this access.
IS_USC_09 (Salisbury Plains Rd)	TTIA §6.7.4 and §9 summary: BAL; Appendix G: AUL, high/long-term construction impact.	Main EIS Table 14.3: AUL for East Hub construction access.	Reconcile basic versus auxiliary lane, identify controlling design and consult affected local road users.
School buses, rural access	Temporary-access framework offers generic controls and later consultation.	EIS TT17, TT18, TT19 and TT23 retain conditional mitigation, some timed during construction.	Identify stops, private and independent school bus services, driveways and required pre-impact physical works.

22 | Failure to adequately justify no-upgrade decisions at Uralla town-centre intersections — Technical Report 7, Section 6.7.4 (printed pp. 113–114)

Evidence and EIS shortcomings

A key concern is EnergyCo's conclusion in Section 6.7.4 of Technical Report 7 – Traffic and Transport Impact Assessment that the New England Highway/Hill Street intersection (IS_USC_01) and the New England Highway/Salisbury Street intersection (IS_USC_15) are acceptable from both an operational and safety perspective and therefore warrant no upgrades. The conclusion requires considerably stronger, intersection-specific justification when the traffic report is cross-referenced against the main Environmental Impact Statement (EIS), the amended Secretary's Environmental Assessment Requirements (SEARs), Transport for NSW's advice of 11 February 2026 and the foreseeable contingency under which construction traffic uses existing routes through Uralla if the Staces Road–Thunderbolts Way connection is unavailable. At Salisbury Street, Technical Report 7 (printed pp. 113–114) expressly acknowledges non-compliance with formal turn-lane standards, including a short left-turn deceleration area, yet finds the existing configuration acceptable. Importantly, the same report's Section 8.7 (printed p. 159) identifies Salisbury Street among New England Highway intersections where historical casualty crashes were concentrated. The 30 casualty crashes cited in that discussion relate to the wider Glenburnie Road–Armidale corridor, not 30 crashes at Salisbury Street: the location-specific crash history and its implications therefore need to be disclosed rather than inferred. At Hill Street, the no-upgrade recommendation relies in part on sufficient road width for vehicles to pass queued right-turning traffic and a preference to retain existing on-street parking. Avoiding removal of parking may be a legitimate planning consideration, but it does not independently demonstrate safe large-vehicle turning, passing and queuing movements alongside parked vehicles, pedestrians and other road users. Section 6.6.1 and Table 6-20 of Technical Report 7 envisage a contingency that diverts general construction traffic through Rowan Avenue, Salisbury Street and Duke Street; Section 6.7.4 nevertheless proposes no further intersection upgrades beyond standard traffic management. The main EIS's Section 14.3.2 and 14.3.6 discussion of risk-based treatments and generally acceptable network capacity does not, by itself, establish that either town-centre intersection is safe for the actual mix of light vehicles, heavy vehicles, buses and other road users at the forecast peak. Road capacity and road safety must be assessed separately. The amended SEARs (Transport, p. 4) require road-safety and intersection-performance assessment and appropriate mitigation, while TfNSW's amended advice requires intersection turning-demand and warrant assessments, safe sight-distance and swept-path analysis, consideration of cumulative traffic and agricultural peak periods, and relevant strategic concept designs. Require that the Department obtain the

underlying intersection-specific crash analysis, surveyed and forecast directional turning volumes by vehicle class and stage, peak-hour and cumulative scenario tests including the absence of the Staces Road connection, swept paths for the largest relevant construction vehicles, queue and parking-conflict assessments, pedestrian and school-bus safety assessments, and written confirmation of the basis on which TfNSW accepts or rejects each no-upgrade recommendation. Where the assessments identify unacceptable risks, the Department should require appropriate preventative engineering or enforceable access restrictions before the corresponding substantial construction traffic commences. It is not sufficient to rely on broad assertions that current intersection layouts are operationally acceptable while documented design non-compliance, historical crash concerns and the project's alternative construction routing remain without a transparent, verifiable location-specific safety justification.

> Supporting references: Technical Report 7, §6.6.1 (printed p. 97), §6.7.4 and Table 6-20 (printed pp. 112–114), §8.7 (printed p. 159), and Appendix A intersection register (including IS_USC_01 and IS_USC_15); main EIS, §§14.3.2, 14.3.6 and 14.6 (printed pp. 561, 565 and 570–575); amended SEARs, Transport (p. 4); and TfNSW amended SEARs advice dated 11 February 2026, Attachment A (pp. 2–6).

> POSITION SOUGHT

Provide measured sight-distance, crash, queue and turning assessments for the Uralla town-centre intersections identified as needing no upgrade, including New England Highway/Hill Street and Salisbury Street. Document the justification for retaining, changing or strengthening each proposed treatment under cumulative traffic.

23 | Failure to demonstrate the suitability of roads not currently approved for OSOM transport and deferral of essential road upgrades — Technical Report 7, Section 6.7.5 (printed pp. 114–120)

Evidence and EIS shortcomings

A key concern is EnergyCo's approach to assessing and providing the necessary road upgrades for Oversize Overmass (OSOM) vehicles, particularly where the proposed transport routes include roads that are not currently approved for OSOM load-carrying vehicles. Technical Report 7, Section 6.7.5, acknowledges that road treatments are necessary to facilitate OSOM movements but states that the final need, extent and design of individual treatments will be confirmed during subsequent project stages, following further vehicle procurement, route surveys and transport investigations. This raises a fundamental question as to how the Department can adequately assess the safety, feasibility and environmental impacts of the proposed OSOM transport arrangements when the full extent of the necessary road upgrades has not been clearly established.

A further concern is Table 6-9 (printed p. 88), which identifies substantial sections of the Uralla–Walcha OSOM route, including Thunderbolts Way between approximately Mirani Road and Darjeeling Road, Staces Road, Darjeeling Road and Saleyards Road, as not currently approved on the NSW OSOM load-carrying vehicle network. Despite this acknowledgement, Table 6-21 (printed pp. 116–118) predominantly identifies localised works such as hardstand construction, vegetation removal, signage relocation, fencing adjustments and utility modifications, without clearly demonstrating that the full length of these roads has been assessed for pavement strength, structural capacity, bridges, culverts, road width, shoulder stability, turning movements, steep gradients and safe passing opportunities. The absence of an existing OSOM network approval does not automatically mean that every road requires reconstruction; however, it places particular

importance on EnergyCo demonstrating that the proposed vehicles can safely and lawfully use each road, either in its existing condition or following clearly identified and approved upgrades.

The Tamworth OSOM bypass reveals a further identifiable evidence gap. Technical Report 7, §6.4.2 and Table 6-7 (printed pp. 85–86), assess the Whitehouse Lane–Marsden Park Road–O'Briens Lane–Nundle Road alignment as an indicative option, stating that Whitehouse Lane and Marsden Park Lane are not approved on either the NSW OSOM load-carrying vehicle network or the 4.6-metre-high vehicle network. The published table leaves the O'Briens Lane distance, the vehicle-height network dimension and the road load-limit tonnage blank, despite stating that a Tamworth Regional Council permit is required. The designation also differs between "Marsden Park Lane" in the technical table and "Marsden Park Road" in EnergyCo's subsequent public material. These omissions must be corrected rather than silently treated as resolved by future permits. EnergyCo's separate Tamworth Port to REZ OSOM route development report (September 2026, pp. 4–7) confirms the Whitehouse Lane alignment was selected, whereas the New England network-infrastructure traffic assessment still treats the alignment as provisional. EnergyCo must reconcile the final selected Port-to-REZ corridor, its current network approvals, load/height/bridge constraints, pavement capacity, swept paths, committed upgrades and delivery responsibility with the route and traffic assumptions upon which this EIS relies.

The consequences extend beyond the movement of individual OSOM loads. EnergyCo's September Tamworth route report (pp. 5–6 and §5.3) records approximately 670 existing vehicles per direction per day along Whitehouse Lane and Marsden Park Road, with about 25% heavy vehicles; it models a conservative, unrestricted full-sealing scenario that could divert approximately 350 additional vehicles per direction per day and increase route traffic to as many as 1,020 vehicles per direction per day. This is a scenario, not a confirmed future forecast: it assumes all relevant through-traffic shifts to the sealed route and that no administrative controls apply. Nonetheless, it establishes a foreseeable risk that sealing rural lanes for OSOM deliveries may attract substantial general and heavy through-traffic. Before relying on the bypass as adequate mitigation for Tamworth CBD, EnergyCo must demonstrate its actual operational controls and evaluate realistic controlled and uncontrolled scenarios, including intersections, local road deterioration, vehicle noise, farm entries, school transport, mail and emergency services, and residential safety. The October 2026 consultation on possible sealing and intersection works closed on 28 October; its findings and any design changes should be published and reconciled with the network-infrastructure EIS, rather than remaining in an unconnected Port-to-REZ assessment.

Flood resilience is a separate and potentially critical constraint that should not be deferred to an unspecified future stage. EnergyCo's Tamworth route development report, §5.5 and pp. 23–25, identifies the common O'Briens Lane/Nundle Road crossing of Goonoo Goonoo Creek as the most serious flood constraint: approximately 1,806 metres of the shared road section is flood-affected in the reported 1% annual-exceedance-probability assessment, including about 1,771 metres classified as higher hazard (H3–H6). That report expressly characterises its review as a desktop comparison of existing conditions that did not model the hydraulic effect of proposed new fill, culverts, bridges or associated works. Its conclusion that the alternative alignments have similar flood risk does not demonstrate that the selected route can be operated safely during flood events, that works will not adversely affect nearby land, or that viable OSOM diversion and emergency arrangements exist. EnergyCo must provide completed site-specific hydrology and hydraulic modelling, the design flood immunity and scour criteria, flood-road closure thresholds, weather-based dispatch protocols, alternative haulage routes, emergency access arrangements, landholder flood-impact assessment and a funded drainage/maintenance program before haulage begins. No route-management plan should authorise OSOM or other project vehicles to traverse floodwater.

Transport for NSW's amended advice dated 11 February 2026, particularly Attachment B (pp. 9–10), expressly requests bridge assessments, swept-path analysis, identification of structural constraints, pavement investigations, assessment of pull-over bays and details of all necessary road modifications.

Importantly, Transport for NSW also identifies EnergyCo's responsibility to provide additional upgrades where the separate Port to Renewable Energy Zones works do not accommodate the project's proposed OSOM vehicles and confirms that NHVR permits do not replace the roadworks and environmental approvals required. I am therefore particularly concerned that EnergyCo appears to rely on future investigations, separate infrastructure projects and subsequent permits without sufficiently demonstrating, in the exhibited EIS, that the entire proposed route will be capable of safely accommodating the anticipated OSOM loads. This concern is compounded by Section 6.7.5's identification of approximately a dozen possible additional pull-over locations, while suggesting that the number ultimately required may be reduced because OSOM movements are proposed during periods of lower traffic. Reduced traffic volumes during night-time transport do not remove the obligation to demonstrate safe passing opportunities, emergency access, adequate road geometry or protection for other road users.

These matters are particularly significant for Thunderbolts Way and the Salisbury Plains community, where narrow roads, rural property entrances, agricultural machinery, livestock transport and school bus operations already create foreseeable safety concerns, many of which were formally raised in the community mitigation document submitted to EnergyCo on 5 September 2026. The amended Secretary's Environmental Assessment Requirements (SEARs) require assessment of road capacity and condition, road safety, OSOM routes, cumulative impacts and a schedule of necessary road upgrades, while the main EIS, Section 14.3.3, similarly identifies the need for physical road improvements to accommodate OSOM vehicles. The Department should require EnergyCo to provide a complete, independently verifiable, road-by-road OSOM capability assessment identifying every section not currently approved for the proposed vehicles, the largest design vehicle and axle loads, existing pavement and structural capacity, bridge and culvert assessments, all necessary physical upgrades, engineered passing and pull-over locations, relevant approvals, responsible delivery agencies and confirmed completion dates. EnergyCo must also clearly distinguish works included within this project from works dependent upon other projects and provide evidence that those external works will be completed and suitable before the proposed OSOM movements occur. Any outstanding deficiencies must be resolved through appropriate engineering evidence, approved works and enforceable implementation requirements before the affected routes are used.

> Supporting references: Technical Report 7, §6.4.2 (printed pp. 81–89) and §6.7.5 (printed pp. 114–120), Tables 6-9 and 6-21, Figures 6-12 and 6-21; main EIS §14.3.3 (printed p. 563) and mitigation measures TT5–TT8 (printed pp. 571–572); amended SEARs, Transport (p. 4); Transport for NSW amended advice dated 11 February 2026, Attachment B (pp. 9–10); and Salisbury Plains and Thunderbolts Way Community Mitigation Document dated 5 September 2026 (Attachment A below). Additional Tamworth evidence: Technical Report 7, Table 6-7 (printed pp. 85–86); EnergyCo, Tamworth Port to REZ OSOM route – development report (September 2026), Executive Summary (pp. 4–7) and §5.5 (pp. 23–25); EnergyCo, Port to REZ: Muswellbrook to New England REZ project page, Tamworth OSOM route and October 2026 Have Your Say consultation (closed 28 October 2026).

Further evidence and assessment gap. The September 2026 Tamworth Port-to-REZ route documentation indicates that an existing administrative load limit near Nemingha is intended to discourage general heavy through-traffic, while permitted OSOM movements are treated differently. That control is material to interpreting the September traffic diversion scenario of up to 1,020 vehicles per direction per day. EnergyCo should identify the actual legal and operational form of any load restriction, exceptions, issuing authority, enforcement arrangement, alternative routes and what happens if sealing changes route attractiveness; it must test both the controlled route and a credible non-compliance or changed-control scenario. The October 2026 public consultation on sealing Whitehouse Lane/Marsden Park Road and intersection works concluded on 28 October. The formal feedback report and revised design must be integrated into this EIS rather than deferred to a separate, inaccessible assessment (Technical Report 7, Table 6-7, printed pp. 85–86; EnergyCo Tamworth Port-to-REZ OSOM Route Development Report, September 2026).

Further supporting evidence. The New England Highway approach between Moonbi and Bendemeer raises a further construction-traffic gap. Technical Report 7, Table 6-8 (printed p. 87), identifies southbound police escort requirements for loads wider than 3.5 metres between Charles Street, Moonbi and Caroline Street, Bendemeer. The transformer vehicle turning-path and route sketch series in Appendix K includes

RS_TRC_21 (New England Highway/Charles Street) and RS_TRC_23 and RS_TRC_25 (north of Moonbi). Affected residents identify potential utility/pole relocation, overhead clearance work, pavement widening, vegetation removal, construction plant deliveries and spoil export along this winding and steep highway section. The existence, final extent and haulage volumes of each proposed treatment should be verified against the actual Appendix K plans and Port-to-REZ design rather than asserted as completed works. Where works are required, their own two-way heavy-vehicle traffic, road occupation, alternative access, biodiversity footprint and school/agricultural conflicts must be included in the network assessment; the right to transport OSOM vehicles later is not evidence that preceding road-upgrade construction will have no material impact.

> POSITION SOUGHT

For every road not currently approved for the relevant OSOM vehicle class, publish a chainage-specific suitability, load, pavement, bridge/culvert and swept-path assessment, together with the approval route, traffic controls, funded upgrades and verified date on which haulage can lawfully and safely commence. Specifically reconcile Table 6-7 (pp. 85–86) and the selected Tamworth bypass, publish the missing O'Briens Lane dimensions/restrictions and route permissions, model the up-to-1,020-vehicles-per-direction unrestricted sealing scenario alongside realistic controlled scenarios, and complete independent Goonoo Goonoo Creek flood and emergency-diversion assessments. Disclose the October 2026 consultation outcomes and require necessary safety, drainage and pavement works before project haulage.

Additional requirement by EnergyCo. Reconcile Tamworth administrative load limits and OSOM permits with the September 2026 traffic scenarios and October feedback, including school and flood controls. For Moonbi–Bendemeer, supply a plan-numbered, chainage-specific schedule of Appendix K RS_TRC_21/23/25 treatments, confirmed power and communication clearances, poles, pavement and tree removal, spoil destination, worksite access, laden/empty construction truck trips, lane closures and independent safety/vegetation approvals, before reliance on the route's proposed capacity.

24 | Failure to demonstrate adequate OSOM passing opportunities, protection of rural property access and agricultural movements on Thunderbolts Way — Technical Report 7, Figure 6-23 (printed pp. 119–121)

Evidence and EIS shortcomings

A key concern is EnergyCo's failure to adequately identify, assess and guarantee safe passing opportunities for motorists travelling behind Oversize Overmass (OSOM) vehicles along Thunderbolts Way between Uralla and Walcha. Figure 6-23 of Technical Report 7 (printed p. 121) does not identify any existing overtaking lanes or existing wide shoulders along this section of the proposed OSOM route, raising the legitimate concern that motorists following exceptionally large and slow-moving OSOM convoys could be required to travel a considerable distance without a safe opportunity to pass. Although Figure 6-23 identifies several indicative pull-over bays along the wider route, EnergyCo has not clearly established their exact locations, whether they are approved or funded, when they will be constructed, or whether they will be operational before

OSOM movements commence. An indicative pull-over bay on a map is not an enforceable commitment to construct a safe passing facility.

EnergyCo's Table 6-22 (printed p. 119) assumes OSOM travel speeds of approximately 20 km/h on regional roads, reducing to 10 km/h on steep sections. At these speeds, the absence of appropriately spaced passing opportunities could result in substantial queues and delays for local residents, agricultural vehicles, livestock transport, school buses, emergency services and other road users who depend on Thunderbolts Way for daily access and essential journeys.

A further concern is the potential for OSOM convoys and the associated build-up of following traffic to obstruct private rural driveways and severely restrict residents' ability to safely enter or exit their properties. Thunderbolts Way is not merely a transport corridor: it provides the principal access to working agricultural properties and family homes. Where convoy-generated queues extend past rural property entrances, residents may effectively become trapped in their own driveways, unable to enter the traffic stream safely or undertake essential journeys until the convoy and following traffic have passed. Such obstruction could affect travel for employment, school, medical appointments, emergencies and time-sensitive farm work.

EnergyCo has also not adequately demonstrated how OSOM convoys and the queues they generate will interact with normal agricultural stock movements along Thunderbolts Way. Farming families must move cattle and sheep between paddocks, across roads and through farm entrances as part of ordinary operations. These movements cannot always be postponed or rescheduled to suit a convoy. Extended queues, escort vehicles and slow-moving loads could delay or prevent stock crossings, obstruct livestock trucks and farm machinery, increase the risk of animals becoming distressed or escaping, and create hazardous interactions between livestock and other road users. Delays may have animal-welfare and financial consequences for farming families. These are foreseeable impacts requiring property-specific assessment and mitigation, not simply general assurances that congestion will be temporary.

Section 6.7.5 identifies approximately a dozen potential additional pull-over locations across the wider OSOM route, but suggests that fewer may ultimately be required because transport is anticipated during periods of lower traffic, particularly 10 pm to 5:30 am. Reduced night-time traffic does not eliminate the need to preserve safe passing opportunities, access to rural properties and farm operations. Emergency services, livestock transport and residents continue to use these roads outside ordinary business hours, and their access cannot depend solely on the proposed timing of convoy operations.

Transport for NSW's amended advice of 11 February 2026 (Attachment B, pp. 9–10) specifically calls for assessment of rest areas, pull-over bays, narrow roads, overtaking opportunities, manoeuvring times, and impacts on other road users, including agricultural movements and emergency access. The amended SEARs (Transport, p. 4) require road-safety and transport impact assessments and details of necessary mitigation. EnergyCo was also given notice of affected property entrances, farming operations and the need for engineered passing and lay-by facilities in the Salisbury Plains and Thunderbolts Way community mitigation request submitted on 5 September 2026. The main EIS commitments TT5, TT16, TT17, TT19 and TT23 cannot substitute for a documented location-specific assessment of these foreseeable risks.

The Department should require EnergyCo to identify every existing and proposed OSOM passing opportunity between Uralla and Walcha, with its exact chainage and distance from Uralla, location relative to the Uralla and Walcha Shire boundary, design vehicle and capacity, construction approval and funding status, responsible road authority and programmed completion date. EnergyCo must provide the longest distance and realistic maximum time that following motorists could be required to travel behind an OSOM convoy without safe passage, predicted queue lengths, and modelling of the consequences for driveways, agricultural stock crossings, livestock transport, school buses, emergency vehicles and adverse-weather operations.

In particular, EnergyCo must demonstrate how affected residents will maintain safe and practical entry to and exit from their properties during OSOM movements, including controls that prevent convoy-generated queues from blocking rural driveways, procedures for both planned and urgent stock movements, communications and escort arrangements, and agreed arrangements with affected landholders. Specific attention must be given to the Thunderbolts Way section within Uralla Shire and whether any confirmed usable passing facility exists before the Walcha Shire boundary. These arrangements must be enforceable and demonstrable before haulage, not left to individual residents to negotiate after traffic has accumulated.

All necessary passing facilities, driveway-access protections and agricultural traffic management measures should be identified, approved as required, funded and implemented before the relevant OSOM movements commence.

> Supporting references: Technical Report 7, §6.7.5, Table 6-22 and Figure 6-23 (printed pp. 119–121); amended SEARs, Transport (p. 4); Transport for NSW amended advice of 11 February 2026, Attachment B (pp. 9–10); main EIS §14.3.3 and mitigation measures TT5, TT16, TT17, TT19 and TT23; original Salisbury Plains and Thunderbolts Way community mitigation request of 5 September 2026.

> POSITION SOUGHT

Prepare an independently reviewed Thunderbolts Way convoy and passing plan showing numbered and located pull-over bays, actual lane widths, queue lengths, expected follow times and continuous rural driveway, livestock, school-bus and emergency access. Build and commission necessary facilities before OSOM operations.

25 | Unreconciled OSOM vehicle weights, unsupported transport assumptions and failure to adequately address road safety and agricultural impacts — Technical Report 7, Section 6.7.5 (printed p. 120)

Evidence and EIS shortcomings

A key concern is the accuracy, consistency and adequacy of EnergyCo's OSOM transport assumptions presented in the Summary on page 120 of Technical Report 7, particularly when cross-referenced against the main Environmental Impact Statement (EIS), the amended Secretary's Environmental Assessment Requirements (SEARs) and Transport for NSW's amended advice dated 11 February 2026. EnergyCo's own figures appear inconsistent and require detailed reconciliation. Page 120 states that approximately 13 of the proposed high-risk OSOM movements will exceed 200 tonnes, while the remaining movements are described as weighing approximately 100–125 tonnes. However, Table 6-15, page 95, identifies 53 one-way high-risk OSOM movements, including 8 phase-shifting transformer movements, 10 line shunt reactor movements and 5 synchronous condenser component movements involving total combination weights exceeding 184.5 tonnes. These figures do not readily reconcile with the simplified weight categories presented on page 120, particularly if both statements refer to total laden combination weight rather than component or payload weight. EnergyCo must explain precisely how these figures have been calculated and provide the actual total laden weights, axle configurations, vehicle dimensions and number of movements for each equipment category.

Equally concerning is EnergyCo's suggestion that lighter OSOM vehicles can travel faster and therefore require fewer pull-over opportunities, together with its reliance on the existing overtaking lanes and wider

shoulders of major highways to justify a reduction in additional passing infrastructure. This reasoning fails to adequately demonstrate how such assumptions can be applied to Thunderbolts Way, where Figure 6-23, page 121, does not identify existing overtaking lanes or existing wide shoulders along the proposed Uralla–Walcha OSOM route. EnergyCo's own Table 6-22 assumes average regional OSOM travel speeds of approximately 20 km/h, reducing to 10 km/h on steep sections. At these speeds, the potential for prolonged traffic queues, significant delays and restricted property access cannot reasonably be dismissed without route-specific modelling. This issue extends well beyond inconvenience to motorists. Thunderbolts Way is an essential access route for rural residents and agricultural businesses, and the accumulation of vehicles behind slow-moving OSOM convoys could prevent residents from safely entering or exiting private driveways, potentially leaving families effectively trapped on their properties until the convoy and following traffic have cleared. Such congestion could also prevent or delay cattle and sheep movements across the road, restrict livestock transport, interfere with farming operations and compromise emergency access. These are foreseeable impacts that require direct assessment and preventative mitigation.

EnergyCo's assumption that OSOM movements departing the Port of Newcastle between 8 pm and 10 pm will encounter reduced traffic does not establish the actual times these vehicles will travel through Uralla and along Thunderbolts Way, particularly when the journey involves multiple driving shifts. It is also concerning that final OSOM vehicle specifications, transport frequencies, schedules, route arrangements and some infrastructure requirements are to be confirmed during subsequent project stages. The amended SEARs require a concept-level assessment of high-risk transport routes, road safety and the necessary road upgrades, while Transport for NSW expressly requires identification of passing opportunities, narrow-road constraints, bridge and pavement suitability, convoy manoeuvring times and impacts on existing road users, including agricultural activities. The main EIS, Section 14.3.3, similarly recognises the need for physical road improvements and passing opportunities but does not resolve these outstanding concerns merely by referring to future detailed design and traffic management plans.

The Department should require EnergyCo to reconcile all OSOM vehicle weight and movement figures; provide a complete schedule of loaded and return journeys; identify the actual travel speeds, arrival times and convoy frequencies expected along Thunderbolts Way; and undertake a route-specific assessment of maximum traffic delays, queue lengths, safe passing opportunities, private driveway access and agricultural stock movements. All necessary road upgrades, passing bays and property-access protection measures must be identified and their implementation secured before the relevant OSOM movements commence. The Department should require independently verifiable evidence demonstrating that the proposed OSOM transport arrangements can operate safely and without unreasonable interference with the existing community before accepting EnergyCo's conclusions.

> Supporting references: Technical Report 7, §6.5.7 and Table 6-15 (printed p. 95), §6.7.5, Table 6-22 and Figure 6-23 (printed pp. 119–121); main EIS §§3.3.6 and 14.3.3, Table 3.8 and mitigation measures TT5–TT8 and TT16–TT19; amended SEARs, Transport (p. 4); Transport for NSW amended advice of 11 February 2026, Attachment B (pp. 9–10); original Salisbury Plains and Thunderbolts Way community mitigation submission dated 5 September 2026.

> POSITION SOUGHT

Reconcile all reported transformer payloads, laden combination masses, axle loads and high-risk movement numbers across Tables 6-15/6-22, the EIS and the page 120 summary. Independently justify journey speeds, operating windows, return trips, passing requirements and enforceable safeguards for farming and local traffic.

26 | Failure to adequately assess and demonstrate the structural suitability of bridges, culverts and watercourse crossings along proposed heavy vehicle and OSOM transport routes — Technical Report 7, Sections 4.5.7–4.5.8, 6.4.2 and 6.7.5

Evidence and EIS shortcomings

A key concern is EnergyCo's apparent failure to provide a complete, transparent and independently verifiable assessment of the structural suitability of bridges, culverts, causeways and watercourse crossings along the proposed heavy vehicle and Oversize Overmass (OSOM) transport routes associated with the New England Renewable Energy Zone Network Infrastructure Project. This is particularly concerning given that EnergyCo proposes to transport exceptionally large vehicles and equipment, including loads exceeding 200 tonnes, across roads and infrastructure that may not have been originally designed to accommodate vehicles of this size and weight.

Technical Report 7, Section 6.4.2 (printed p. 87), expressly identifies the bridge over Surveyors Creek near Uralla as an existing constraint influencing the proposed Staces Road–Thunderbolts Way connection. This acknowledgement raises serious questions regarding the structural and operational limitations of other bridges and culverts along the proposed alternative route, including Staces Road, Thunderbolts Way, Darjeeling Road, Saleyards Road and the Oxley Highway. the strategic design drawings in Appendix K identify culvert extensions, replacement or new drainage structures at several locations, while other parts of the report identify bridge restrictions, including a proposed warning sign relating to a 20-tonne bridge load limit on a construction access route associated with Ruby Hills Road. These findings demonstrate that bridge restrictions and drainage infrastructure constraints are relevant to the project; however, the exhibited documentation does not clearly establish a comprehensive structure-by-structure assessment identifying which crossings can safely accommodate the proposed vehicles, which require upgrading and which must be avoided.

While Technical Report 7 identifies localised treatments such as hardstand construction, road widening, signage relocation, vegetation removal and drainage modifications, these measures do not, in themselves, demonstrate the structural capacity of existing bridges and culverts to withstand the anticipated vehicle combinations and axle loads. A further concern is EnergyCo's reliance on slower OSOM travel speeds when crossing bridges, with Section 4.5.8 incorporating additional travel time for bridge crossings. Reducing the speed of a vehicle does not establish that a bridge or culvert has sufficient structural capacity to support its weight.

The amended Secretary's Environmental Assessment Requirements (SEARs), page 4, require assessment of road condition, road safety, high-risk transport routes and all necessary road upgrades. More specifically, Transport for NSW's amended advice dated 11 February 2026, Attachment B, pages 9–10, expressly requires assessments of at-risk bridges, identification of potentially unsuitable major and minor culverts, pavement investigations, consideration of axle loading and confirmation that road upgrades undertaken through separate projects are capable of accommodating the proposed OSOM vehicles. Transport for NSW also makes clear that additional necessary road upgrades remain the project's responsibility and that NHVR permits do not replace required roadworks and environmental approvals. The main EIS, Section 14.3.3, acknowledges the need for physical road improvements but leaves elements of the final treatment design to subsequent project stages. This raises a fundamental question as to how the Department can determine that the proposed transport routes are safe and suitable when the structural adequacy, precise upgrade requirements and approval arrangements for every potentially affected bridge and culvert have not been clearly demonstrated.

The issue is particularly significant for Thunderbolts Way and surrounding rural roads, where infrastructure limitations, narrow carriageways, agricultural vehicles, livestock movements and restricted passing

opportunities could compound the risks associated with exceptionally heavy loads. It is also essential that the assessment consider cumulative impacts from EnergyCo, Winterbourne Wind Farm and other developments proposing to use the same road infrastructure.

These structural concerns must also be considered alongside the potentially incomplete cumulative traffic assessment detailed in Sections 38 and 38.1 of this submission. Technical Report 7, Chapter 8, Table 8-1, does not separately identify five substantial publicly registered proposals: Balala Wind Farm (SSD-143456490), Hillview Solar Farm (SSD-72447960), Hillview Wind Farm (SSD-78329994), Eastern Hub Firming Battery (SSD-71860708) and Deeargee Solar Farm (SSD-70753725). Although their approvals, commencement dates, precise transport routes and traffic volumes are not yet certain, those uncertainties do not justify omitting reasonable screening of foreseeable cumulative impacts. EnergyCo should provide an itemised explanation for the exclusion of each development and test credible scenarios involving construction and haulage overlap where common corridors, crossings or road assets could be affected.

The importance of this omission extends beyond traffic congestion. A demonstration that a nominated OSOM vehicle can cross a particular bridge or culvert under specified conditions is not equivalent to assessing the repeated axle loading, structural deterioration and maintenance demand arising when several major developments use the same infrastructure over overlapping construction periods. Additional heavy vehicles, Special Purpose Vehicles (SPVs) and OSOM movements may materially increase axle-load repetitions, deterioration of bridge approaches and pavements, and the loading exposure of bridges, culverts and drainage structures, particularly where their condition, cover depth or structural capacity is already constrained. The network's approved status and the report's allowance for slow bridge crossings do not replace individual load-capacity checks or an assessment of cumulative structural exposure. It must not be assumed that all five projects will use every road; the actual likely routes, timeframes and movements must be established, and realistic higher-impact scenarios tested where information is incomplete.

Accordingly, and expressly cross-referencing the omissions and proposed OSOM sensitivity testing identified in Sections 38 and 38.1, I request a revised, independently reviewable, route-by-route and structure-by-structure assessment of the relevant Bayswater/Muswellbrook–Tamworth–Uralla–Armidale heavy-vehicle corridors and any associated detours and hub access routes. For each bridge, culvert, causeway and constrained crossing, EnergyCo should identify its location and road authority, existing condition and load restriction, the largest proposed laden vehicle and axle-group configuration, the expected frequency and timing of relevant heavy-vehicle, SPV and OSOM crossings, and the combined loading exposure under credible overlapping-project scenarios. The assessment should identify necessary structural investigations, upgrades, monitoring, maintenance, traffic restrictions, responsible parties, funding and the dates by which works must be completed. Where information about proposed projects remains uncertain, transparent sensitivity testing should be undertaken rather than treating missing projects as having no potential effect. The Department should require the resulting cumulative bridge-and-culvert evidence, together with any project-specific engineering assessments held by Transport for NSW or the separate Port-to-REZ program, to be disclosed and reconciled before relying on the EIS conclusions or approving haulage over affected structures.

> Supporting references: Technical Report 7, Sections 4.5.7–4.5.8, 6.4.2 and 6.7.5; Tables 6-9, 6-21 and 6-22; Appendices J and K; main EIS, Sections 3.3.6 and 14.3.3 and mitigation measures TT5–TT8; amended SEARs, Transport (printed p. 4); Transport for NSW amended advice of 11 February 2026, Attachment B (pp. 9–10); Technical Report 7, Chapter 8, Sections 8.1 and 8.4–8.5 and Table 8-1; Sections 38 and 38.1 of this submission (five apparently omitted developments and cumulative OSOM sensitivity testing); NSW Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026), Section 3.4.

> POSITION SOUGHT

Produce an independently reviewable structure-by-structure register for all bridges, culverts, causeways and crossings on actual project and relevant cumulative haulage routes. Provide load/axle checks, condition, restrictions, likely repeated loading from shared routes, alternative-route or upgrade decisions, TfNSW/council approvals, funded works and dates before affected crossings are used; reconcile the development scenarios in §§38 and 38.1.

27 | Construction-overlap timing and local cumulative peak scenarios

The distinct issue addressed here is the timing of concurrent construction. Technical Report 7, §8.5.1 (printed p. 151), presents selected cumulative traffic periods, but a regional network-wide peak may not capture the highest combined demand on each rural road, intersection or school-bus route. A shorter and more intensive local overlap could produce the greatest disruption for Salisbury Plains even when overall network capacity is available.

This section addresses the modelling method and construction-overlap timetable. The identification and screening of five further renewable developments is examined in Section 38; specialised cumulative OSOM trip generation is addressed in Section 38.1, and consequences for local junctions and services in Section 39.

> POSITION SOUGHT

Recalculate cumulative traffic by individual road segment and construction period, including plausible overlapping commencement dates rather than relying only on regional network peaks. Publish the most demanding credible local scenarios for Uralla, Salisbury Plains, Thunderbolts Way and school-bus routes, and identify the resulting mitigation.

28 | Baseline road-condition evidence, inspection standards and repair thresholds

The issue in this section is the minimum baseline information and measurable standards needed for road-asset protection. Technical Report 7, §§6.7.7 and 9.1.5, acknowledges accelerated pavement deterioration and anticipates condition surveys and repair, but the submission seeks documented, agreed pre-construction condition, engineering tolerances, inspection intervals and repair triggers before haulage begins.

Sections 31–33 collectively examine the particular engineering and funding implications for Thunderbolts Way and the wider Walcha–Bayswater network. These road-specific arguments should not be replaced by broad promises of post-construction reinstatement.

> POSITION SOUGHT

Commission road authority-agreed pre-haulage photographic, structural and pavement-condition surveys for all affected roads, bridges and culverts. Set objective condition thresholds, inspection frequency, prompt repair times, independent verification, funding responsibility and final reinstatement standards.

29 | Temporary road stoppages, conductor stringing and continuity of local access

This section addresses temporary closures and stoppages arising from conductor stringing and the interaction with normal rural road use. TfNSW's amended advice (Attachment A, p. 7) seeks limits and management controls for stoppages; the routes, anticipated numbers of disruptions, notice periods, alternative access and operational contingencies must be specified rather than deferred to general traffic-management commitments.

Emergency response and evacuation arrangements are assessed separately in Section 36, while the community mitigation correspondence and reasons for individual property decisions are addressed in Section 41.

> POSITION SOUGHT

Publish a route- and date-specific schedule for conductor-stringing road closures and other work stoppages, showing notice arrangements, TfNSW limits or approved variations, diversions and continuous access for livestock, farm work, school buses and local traffic; implement a documented breach and contingency process.

30 | Evidence verification, corrective-action register and accountability before determination

The numbered findings in Sections 1–29 and 31–44 should be converted into a single auditable corrective-action and responsibility register. This is an implementation and accountability requirement, not a second repetition of each technical objection.

The register must identify the corresponding submission section, location or road chainage, the EIS discrepancy or unassessed impact, further investigations and design outputs, responsible organisation and road authority, approvals needed, secured funding, firm completion milestone and independent verification. It must distinguish actions necessary before determination from those that may safely be completed before specific construction or OSOM movements, with enforceable hold points.

Where EnergyCo disagrees that work is needed, it must provide the relevant engineering or evidentiary basis and a reasoned response. The Department should require this matrix in a form that can be checked against revised technical reports and the community's earlier submissions.

> POSITION SOUGHT

Issue a public corrective-action matrix keyed to every numbered section in this submission and a confidential annex for private-property matters. Allocate each deliverable to a named responsible organisation, road authority sign-off, funding source, assessment or construction hold point, completion date and evidence of closure; explain decisions not to provide requested measures.

31 | Failure to adequately assess and commit to the protection, maintenance and rehabilitation of Thunderbolts Way as a regional road — Technical Report 7, Section 6.7.7, pages 123–124

Evidence and EIS shortcomings

A key concern is EnergyCo's failure to specifically identify and adequately assess the deterioration, maintenance requirements and long-term protection of Thunderbolts Way in Section 6.7.7 of Technical Report 7 – Traffic and Transport Impact Assessment. Thunderbolts Way is expressly identified as a regional road in Section 5.1.2, page 49, and as a significant construction transport corridor elsewhere throughout EnergyCo's own assessment, yet it is conspicuously absent from the roads specifically identified as susceptible to construction-related deterioration in Section 6.7.7. This omission is particularly concerning given that EnergyCo's cumulative traffic assessment in Section 8.5.1, page 151, forecasts additional traffic movements of up to approximately 400 vehicles per day on sections of Thunderbolts Way during overlapping construction activity associated with the New England REZ and other developments.

Thunderbolts Way is already used extensively by farming families, livestock transport operators, school buses, agricultural machinery, local residents and other road users. Its existing condition, narrow carriageway, limited shoulders and sections of constrained road geometry make it essential that the effects of sustained additional heavy vehicle movements are properly investigated and mitigated. Despite acknowledging that cumulative structural loading and increased heavy vehicle movements accelerate pavement deterioration, EnergyCo has failed to demonstrate how the existing condition and structural capacity of Thunderbolts Way have been specifically assessed against the substantial additional traffic forecast for this corridor.

Instead, EnergyCo relies on broad assurances that impacts will be managed through a "proactive road condition management framework", incorporating potential pre-construction dilapidation surveys, targeted upgrades, routine inspections, maintenance and post-construction reinstatement. These general commitments do not identify the specific works required on Thunderbolts Way, the frequency of inspections, measurable pavement-condition standards, maximum response times for repairs, responsibility for funding or arrangements for managing cumulative damage caused by multiple renewable energy developments using the same road. A general commitment to monitor and repair deterioration is not an adequate substitute for demonstrating that the road is structurally capable of safely accommodating the anticipated construction traffic before that traffic commences.

A further concern is EnergyCo's proposal to reinstate affected roads to their pre-construction condition. Where a road is already in poor condition, returning it to that same condition after years of heavy construction traffic does not necessarily provide an acceptable safety outcome or address the additional structural demands placed upon it. Residents should not be expected to endure years of accelerated road deterioration, pavement failures, damaged shoulders, potholes, reduced road safety and disrupted agricultural access simply because EnergyCo proposes to undertake maintenance or reinstatement at some unspecified future time.

Table 9-3, pages 181–182, identifies proposed midblock widening and sealing works on numerous roads, including roads with lower anticipated construction traffic, yet Thunderbolts Way is not included in this schedule of midblock upgrades, notwithstanding its classification as a regional road and its importance to the project. While individual intersection and OSOM treatments are proposed elsewhere in the report, these do not demonstrate that the full affected length of Thunderbolts Way has been assessed for pavement strengthening, shoulder rehabilitation or preventative maintenance requirements. The main EIS, Section

14.3.5, page 564, similarly relies on general road-condition management commitments without separately addressing Thunderbolts Way.

This approach raises serious questions regarding compliance with the intent and adequacy of the assessment required by the amended Secretary's Environmental Assessment Requirements (SEARs), page 4, which expressly require assessment of public road capacity and condition, necessary road upgrades and road maintenance contributions. Additionally, Uralla Shire Council's amended advice dated 4 February 2026, page 2, specifically requests baseline road and bridge condition assessments, identification of required infrastructure upgrades and clear maintenance and reinstatement arrangements for Council-managed assets. It is therefore difficult to understand how EnergyCo can conclude that road deterioration impacts will be temporary, localised and manageable when it has not clearly demonstrated what preventative works, ongoing maintenance standards or financial commitments will be provided for one of the principal regional roads affected by the project.

The Department should require EnergyCo to undertake and publicly document a comprehensive, independently verified pavement-condition and structural-capacity assessment of Thunderbolts Way, covering the full route affected by project and cumulative construction traffic. This assessment must identify existing pavement defects, forecast heavy-vehicle and axle loading, expected deterioration over the construction period, necessary preventative strengthening and rehabilitation works, and the minimum road-condition standards that must be maintained throughout construction. EnergyCo must also establish a written, funded and enforceable road maintenance and rehabilitation agreement with Uralla Shire Council, clearly identifying responsibility for inspections, emergency repairs, routine maintenance, cumulative damage attributable to multiple developments, and final reinstatement requirements.

The protection of Thunderbolts Way cannot be left to discretionary future management plans, unspecified consultation processes or retrospective repairs after deterioration has occurred. The Department should require enforceable commitments to complete necessary preventative works before significant construction traffic commences and to maintain the road in a demonstrably safe and serviceable condition throughout the entire construction period. Rural residents and farming families must not be left to bear the safety, financial and operational consequences of infrastructure deterioration generated by a major State Significant Infrastructure project.

> Supporting references: Technical Report 7, Section 5.1.2 (printed p. 49), Section 6.7.7 (printed pp. 123–124), Section 8.5.1 (printed p. 151), Section 9.1.5 (printed p. 167) and Table 9-3 (printed pp. 181–182); main EIS Section 14.3.5 (printed p. 564) and mitigation measure TT7 (printed p. 572); amended SEARs, Transport (p. 4); Uralla Shire Council amended advice dated 4 February 2026 (p. 2); Salisbury Plains and Thunderbolts Way Community Mitigation Document dated 5 September 2026.

> POSITION SOUGHT

Undertake a Thunderbolts Way-specific road structural and condition assessment using credible project and concurrent-development heavy-vehicle/axle forecasts, with chainage-based strengthening, shoulder, culvert, drainage and passing works. Agree a funded repair and monitoring regime with the road manager before the traffic increase.

32 | Failure to demonstrate enforceable road maintenance funding, repair standards and responsibility for cumulative damage across the Bayswater-to-Uralla construction network

Evidence and EIS shortcomings

A key concern is EnergyCo's failure to demonstrate adequate, legally enforceable and fully funded arrangements for the protection, maintenance and rehabilitation of the State, regional and local road networks proposed to accommodate the substantial heavy vehicle, Special Purpose Vehicle (SPV) and Oversize Overmass (OSOM) traffic associated with the New England Renewable Energy Zone Network Infrastructure Project. Despite the amended Secretary's Environmental Assessment Requirements (SEARs) requiring details of road maintenance contributions, as reproduced in Table 1-1, page 6 of Technical Report 7 – Traffic and Transport Impact Assessment, EnergyCo has failed to identify within that report the actual financial contributions, agreed funding arrangements, measurable repair standards or allocation of responsibility for road deterioration. Although the Executive Summary, page iii, refers to road maintenance agreements, the assessment does not disclose executed agreements, committed funding amounts, payment schedules or binding obligations identifying which organisation will be responsible for repairing damage caused by construction traffic.

Section 6.7.7, pages 123–124, expressly acknowledges that repeated heavy axle loading can accelerate pavement deterioration and cumulative structural weakening, yet relies upon a broadly described road condition management framework under which measures may include inspections, repairs, preventative strengthening and reinstatement. Such discretionary language provides insufficient certainty that necessary preventative works will actually occur before substantial construction traffic commences. Similarly, Section 9.1.5, page 167, proposes dilapidation surveys, inspections and reinstatement without establishing minimum pavement-condition standards, inspection frequencies, maximum repair response times or independently verified rehabilitation requirements. Particularly concerning is Table 9-1, page 169, which qualifies local road dilapidation assessments as being undertaken where required by the relevant road authority, rather than guaranteeing comprehensive baseline assessments of every significantly affected road.

Section 8.10, pages 162–164, acknowledges the shared use of transport routes by multiple infrastructure developments but provides no transparent or enforceable mechanism for determining, attributing and funding cumulative pavement damage where several renewable energy projects use the same roads. This matters for Thunderbolts Way and the broader Bayswater-to-Uralla transport network, where overlapping construction activities may progressively deteriorate pavements, shoulders, bridges, culverts and drainage infrastructure beyond their existing capacity. Although Table 9-3, pages 181–182, identifies proposed road widening and sealing works on roads including Inglewood, Waverley, Barry, Glenburnie, Rouchel and Salisbury Plains roads, a schedule of proposed upgrades cannot reasonably be considered equivalent to a funded and enforceable commitment to ongoing maintenance, emergency repairs and eventual rehabilitation.

Without transparent, adequately funded and enforceable commitments, there is a risk that the financial and safety consequences of deterioration will ultimately fall upon local councils, ratepayers, farming families and rural communities rather than the infrastructure proponents responsible for generating the additional traffic. The absence of these essential details within the Traffic and Transport Impact Assessment raises serious questions about whether the Department of Planning has been provided with sufficient information to determine the full extent of construction-related road impacts and the effectiveness of the proposed mitigation measures.

Further evidence and assessment gap. Additional route-specific risks reinforce the case for mandatory preventative work rather than repairs after harm. On lower-order roads, project-related loading can damage drainage, shoulders and unsealed pavement before an average traffic-volume threshold is exceeded; repeated stop/start heavy vehicles and diversions onto soft verges compound that risk during wet and frozen periods. The proposed road protection arrangements must expressly account for the camp routes, OSOM approach works near Moonbi, water and waste haulage, spoil removal and any rerouting caused by concurrent regional roadworks. Technical Report 7, §6.7.7 (printed pp. 123–124) and §9.1.5 (printed p. 167), do not on their own establish a costed, enforceable and independently monitored route-specific mechanism for cumulative damage.

> POSITION SOUGHT

EnergyCo must publicly identify and provide independently verified baseline pavement, bridge, culvert and drainage assessments for all significantly affected roads across the Bayswater-to-Uralla construction network; disclose the actual road maintenance agreements and financial contributions negotiated with road authorities; establish a fully costed and secured program of preventative upgrades, routine maintenance, emergency repairs and post-construction rehabilitation; specify enforceable minimum safety and pavement-condition standards, inspection frequencies and maximum repair response times; and demonstrate a legally enforceable mechanism for allocating and recovering the costs of cumulative road deterioration caused by multiple concurrent infrastructure developments. These commitments must be established and independently scrutinised before project determination, with the necessary preventative works completed before substantial construction traffic commences.

Additional requirement by EnergyCo. Link each critical haulage route and its additional water, waste, spoil, OSOM-upgrade and camp traffic to pre-use engineering inspections, funded strengthening where required, documented pavement and bridge thresholds, independent condition monitoring, emergency repairs and an enforceable contribution formula for damage involving more than one project; expressly prevent cost transfer to local ratepayers.

33 | Failure to adequately assess road deterioration and provide funded, enforceable maintenance and rehabilitation commitments across the southern construction network from Walcha to Bayswater — Technical Report 7, Sections 6.7.7 and 8.5

Evidence and EIS shortcomings

A key concern is EnergyCo's inadequate assessment of the cumulative deterioration, maintenance requirements and long-term protection of the State, regional and local road networks proposed to accommodate construction traffic associated with the New England Renewable Energy Zone Network Infrastructure Project, particularly across the southern construction network extending from Walcha through the Tamworth, Upper Hunter and Muswellbrook regions towards Bayswater. A review of Technical Report 7, Section 6.7.7, pages 123–124, reveals a recurring reliance on broad assurances that road deterioration will be managed through a 'proactive road condition management framework', rather than clearly identifying the existing condition, structural capacity, anticipated deterioration, necessary preventative upgrades and enforceable maintenance obligations for each significantly affected road.

While EnergyCo specifically identifies several roads susceptible to construction-related deterioration, including Barry Road, Waverley Road, Scrubby Gully Road, Niangala Road, Forest Way, Ruby Hills Road and Wollun Road, other heavily utilised construction corridors receive insufficient individual consideration within this assessment. A further concern is Muscle Creek Road near Muswellbrook, where EnergyCo's own cumulative traffic assessment in Section 8.5.1 identifies approximately 700–1,200 additional vehicles per day on sections of this road during Cumulative Period 1, yet Muscle Creek Road is not specifically identified among the roads most susceptible to deterioration in Section 6.7.7. Similarly, Waverley Road is forecast to experience approximately 390–450 additional vehicles per day during the same cumulative period, while the New England Highway in the southern Muswellbrook and Bayswater corridor is forecast to experience substantial additional traffic, including approximately 1,400 additional vehicles per day during Cumulative Period 2.

Although these figures include both light and heavy vehicles, EnergyCo has not clearly demonstrated how the additional heavy-vehicle axle loading and prolonged construction activity will affect pavement deterioration, structural integrity, drainage infrastructure, road shoulders and ongoing maintenance requirements along each affected section. Table 9-3, pages 181–182, identifies proposed widening and sealing works on several southern roads, including Barry Road, Waverley Road, Niangala Road, Muscle Creek Road, Inglewood Road and Boorolong Road. However, the identification of geometric improvements or localised widening does not, in itself, establish that the remaining road pavement is structurally capable of safely accommodating sustained heavy construction traffic, nor does it constitute a comprehensive maintenance and rehabilitation program.

The same concern extends to the Oxley Highway, Nundle Road and other regional connections serving the southern construction works, where road-specific deterioration assessments and financial maintenance commitments are not clearly established in Section 6.7.7. The main EIS, Section 14.3.5, page 564, largely repeats the same general assurances regarding pre-construction dilapidation surveys, preventative works where required, ongoing inspections, maintenance and eventual reinstatement, without clearly identifying the specific works, funding arrangements, measurable road-condition standards or responsible parties for every significantly affected road.

A further route-specific safety and road-condition gap concerns seasonal exposure on elevated and unsealed approaches. The local concerns provided identify Niangala Road, Niangala Stock Route Road, Flags Road, Topdale Road, Geraldine Road and Hurricane Gully Road as places where winter fog, frost or ice, soft road edges and dust may combine with narrow passing width. These reported conditions require verification of the particular sections selected for construction and OSOM movements, not an assumption that every listed road will be used. Where works occur on such roads, a school bus, timber truck or livestock vehicle forced onto a wet, icy or inadequately compacted shoulder may encounter very different risks from those in the normal dry-road model; project-generated dust may also obstruct visibility and affect livestock grazing near unsealed road edges. EnergyCo should supply road-by-road weather-sensitive pavement and shoulder strength assessments, dust suppression and sight-distance controls, road-closure triggers, construction traffic frequency thresholds and independently audited maintenance obligations, with safety treatments designed for the locally observed worst conditions rather than only standard daytime flows.

This is particularly concerning when the amended Secretary's Environmental Assessment Requirements (SEARs), page 4, expressly require assessment of public road capacity and condition, necessary haulage route upgrades and road maintenance contributions. the main EIS, Table 5.13, page 201, acknowledges that local councils have raised concerns regarding heavy vehicle impacts, road upgrades and maintenance agreements, yet the response relies heavily on ongoing engagement and proposed mitigation rather than demonstrating that comprehensive, binding agreements have been established. Consultation with road authorities is not equivalent to a funded and enforceable commitment to protect their road assets, and a promise to reinstate roads to their pre-construction condition does not necessarily provide an acceptable

outcome where those roads are already deteriorating or structurally inadequate for the additional loads proposed.

It is also essential that EnergyCo recognise the cumulative impacts of other renewable energy developments, including overlapping construction activity, and clearly establish how responsibility for accelerated pavement wear and infrastructure damage will be allocated between project proponents.

The Department should require EnergyCo to provide a comprehensive, road-by-road pavement-condition and structural-capacity assessment covering all significantly affected construction routes across the southern network, supported by forecast cumulative heavy-vehicle loading, existing pavement-condition records, identified strengthening and rehabilitation works, inspection frequencies, objective repair thresholds, emergency response times and independently verified reinstatement standards. EnergyCo must also provide written, funded and enforceable road maintenance agreements with road authorities, clearly identifying financial responsibility for preventative works, routine maintenance, cumulative damage, repairs and final rehabilitation throughout the full construction period. These agreements must ensure that road safety and serviceability are maintained continuously, rather than allowing roads to deteriorate progressively over several years before repairs are considered.

The financial burden and safety consequences of accelerated road deterioration must remain with the developments generating those impacts, not be transferred to rural communities, local road users or already financially constrained councils.

> Supporting references: Technical Report 7, Section 6.7.7 (printed pp. 123–124), Sections 8.5.1–8.5.3 (printed pp. 151–154), Section 9.1.5 (printed p. 167) and Table 9-3 (printed pp. 181–182); main EIS, Section 14.3.5 (printed p. 564) and Table 5.13 (printed p. 201); amended SEARs, Transport (p. 4); relevant road authority consultation requirements.

Further evidence and assessment gap. The affected residents identify recurring frost, fog, black ice, seasonal snow, waterlogged shoulders and winter visitor traffic along elevated sections of Barry Road, Flags Road, Niangala Road, Niangala Stock Route Road, Topdale Road, Forest Way and Nowendoc Road, including routes to Hanging Rock and Sheba Dams. These are route-specific hazards to confirm with councils, emergency services, bus operators and local climate/incident records; they cannot be adequately assessed solely by the report's dry-weather capacity and LoS assumptions. Where a school bus, livestock carrier or logging truck is forced onto an unsealed, frozen or soft verge by oncoming construction traffic, the risk concerns loss of vehicle stability, load shift, inability to pass and compromised escape space, not just delay. Technical Report 7, §§4.5, 6.7.3, 6.7.7 and 8.5.2 should be tested against winter operating conditions and historic closures.

Further supporting evidence. Construction traffic on unsealed or poorly sealed roads can also produce concentrated dust plumes that reduce sight distance for oncoming and following school buses, timber vehicles and stock transport, and deposit dust on adjacent grazing pasture and livestock. Dust intensity depends on surface, water supply, vehicle speed, rainfall and wind and cannot be inferred simply from vehicle count; the submission therefore requires local receptor and road-segment assessment rather than assuming uniform impacts. Practical safeguards may include specified speed restrictions, engineered shoulder protection, road surface improvements, verified dust-control water availability and stop-work thresholds during hazardous visibility, with consultation and monitoring at affected farm boundaries.

> POSITION SOUGHT

Assess and fund road-specific strengthening, surveys, protection and reinstatement on the Walcha–Tamworth–Upper Hunter–Muswellbrook–Bayswater construction network, including the local rural access roads actually proposed for use. Give each road manager a verified condition baseline, cumulative

load assumptions, work program and funded maintenance agreement. Evaluate verified winter frost/ice, narrow-shoulder and dust conditions on high-risk rural haulage roads, including the Niangala and Forest Way approaches, and specify weather-based restrictions, safe passing design, dust-control thresholds and local road-authority funded maintenance measures.

Additional requirement by EnergyCo. Require route-by-route winter and dust risk assessments with actual gradients, widths, shoulders, freeze/fog/snow histories, haulage and visitor seasonality, school and livestock traffic, minimum safe passing/stopping distances, response criteria for ice and visibility, and funded engineering and operational protections before heavy-vehicle use.

33.1 Timor Caves karst system — mandatory investigation, Karst Management Plan and alternative-route assessment

Sargeants Gap Road requires a separate and substantially stronger assessment because its proposed use and widening interact with an irreplaceable geological, ecological and locally listed heritage environment. The main EIS (Section 7.4.3, printed p. 274) confirms that approximately 4.6 hectares associated with 3.3 kilometres of Sargeants Gap Road overlie the mapped karst of Timor Caves. The road is identified for localised widening of up to 2 metres in Technical Report 7, Table 9-3 (p. 181). The EIS acknowledges that the transmission corridor was moved to avoid the karst, yet the project would still undertake road works within the protected geological setting. Timor Caves and geological site is listed as local heritage item I214 under the Upper Hunter LEP 2013 (main EIS, Section 9, pp. 350 and 372). The EIS also identifies cave-dependent fauna, sensitive formations and subterranean aquatic habitats (main EIS, Sections 7.2.7 and 7.3, pp. 247–250).

Most significantly, the main EIS, Section 16.3.7 (p. 615), states that the exact cave locations, depth of cover, geotechnical condition and presence of fragile vibration-sensitive formations such as helictites are not presently known. Technical Report 7, Section 6.7.7 (pp. 123–124), expressly recognises the possibility of variable or sensitive subsurface conditions, pavement deterioration and adverse effects from increased heavy-vehicle loading on the underlying formation, but describes targeted geotechnical investigation as something that may occur. By comparison, the main EIS proposes site-specific geotechnical and vibration assessments (Section 7.4.3), and measures HH13 and NV12 seek advice to set construction vibration limits (pp. 381 and 631). Groundwater measure GW5 (p. 721) requires geotechnical and/or geophysical investigation if vibratory compaction is proposed near identified karst. These commitments are relevant but do not, on the face of the passages reviewed, constitute one unconditional, integrated assessment of all risks before either road widening or increased project traffic. A vibration prediction for a vehicle travelling on a relatively even road cannot by itself establish the stability of unlocated underground cavities or the safety of repeated static and dynamic axle loads, excavation, changes to drainage, or long-term erosion.

The EIS further identifies the Timor and Barry karst as among the most sensitive groundwater environments within the study area because of rapid infiltration pathways and surface–groundwater connectivity (Section 19.3.4, pp. 713–714). It acknowledges that pollutants and changes in drainage or subsurface flow may affect vulnerable ecosystems. Protecting Timor Caves is therefore not merely a road-pavement or construction-vibration issue. It requires assessment of subsurface voids and collapse/subsidence potential, ground-bearing capacity, cut-and-fill excavation, road runoff and erosion, altered recharge, sediment or pollutant entry, cave formations, heritage values and dependent species. NSW National Parks and Wildlife Service guidance identifies some karst environments as exceptionally sensitive and potentially incapable of recovery once damaged. The amended SEARs require consistent definition of the development footprint (p. 2), assessment of historic heritage and biodiversity (pp. 2–3), water, groundwater and soils (p. 3), and land capability and the condition and capacity of haulage roads with necessary upgrades and mitigation (p. 4).

Although the SEARs do not expressly name a Timor Caves Karst Management Plan, these combined requirements provide compelling grounds for making such a plan a specific and enforceable condition.

The Department must not allow road widening, vibratory compaction, excavation or increased project heavy-vehicle use through the mapped karst section until EnergyCo has completed an independent, site-specific geological, geotechnical, geophysical, hydrogeological, ecological and heritage assessment, and an approved Timor Caves Karst Management Plan is in force.

The investigation must map and evaluate cave and void locations and depths, rock and pavement bearing capacity, cumulative vehicle axle-load and vibration scenarios, cut/fill and excavation risks, groundwater and stormwater connections, and the sensitivity of cave formations and cave-dependent fauna. It must be informed by genuine consultation with affected residents and landholders, the relevant road authority, qualified karst/speleological specialists, Heritage NSW, NSW National Parks and Wildlife Service and its Karst Management Advisory Committee, and appropriate groundwater and ecological specialists. The plan must set enforceable restrictions on vehicle mass, movement frequency, speed, construction plant and compaction methods; prohibit blasting or high-impact activities unless independently shown safe; establish baseline and ongoing vibration, structural, groundwater and water-quality monitoring, auditable trigger levels, immediate stop-work and route-closure procedures, emergency response, independent oversight, rehabilitation, and funded accountability for damage. If the necessary investigations cannot demonstrate an acceptably low and effectively controllable risk of irreversible damage, EnergyCo must assess and adopt a feasible alternative construction and haulage route with its own full environmental, road-safety and agricultural assessment, rather than expose the Timor Caves karst system to avoidable harm.

> Cross-references: Technical Report 7 §§6.7.7 and 9.3, Table 9-3 (pp. 123–124, 181); main EIS §§7.2.7, 7.3, 7.4.3, 9.3–9.5, 16.3.7, 19.3.4, and mitigation measures HH13, NV6, NV12 and GW5 (pp. 247–250, 274, 350, 372, 381, 615, 628–629, 631, 713–714 and 721); amended SEARs (pp. 2–4). See also Sections 32–33, 42 and 44 of this submission. NSW National Parks: Karst Area Management Guidelines and Karst Area Management Plans.

> REQUIRED ACTION BY ENERGYCO - **TIMOR CAVES AND SARGEANTS GAP ROAD**

EnergyCo must complete independent site-specific geotechnical, geophysical, groundwater and heavy-vehicle loading assessments, consult residents and karst experts on a binding Karst Management Plan, and assess a safer alternative route before works or increased project traffic.

Before any project-related increase in heavy-vehicle loading or physical works within the mapped karst section, publish an independent geotechnical/geophysical and hydrogeological investigation, a site-specific road-load and alternatives assessment, and an enforceable Timor Caves Karst Management Plan developed with affected residents, karst specialists and relevant heritage, environmental and road authorities. Impose a no-works/no-increased-project-traffic hold point until the investigations, protective design, measurable monitoring thresholds and independent review are completed. If unacceptable or unquantifiable residual risks remain, redirect project construction traffic via a demonstrably safer and suitably assessed alternative route.

34 | Failure to demonstrate adequate, site-specific and enforceable road safety mitigation for communities experiencing substantial construction traffic increases — Technical Report 7, Sections 6.7.8 and 6.7.9 (printed pp. 124–127)

Evidence and EIS shortcomings

A key concern is EnergyCo's inadequate assessment of road safety impacts and its failure to clearly identify, justify and commit to the physical safety measures necessary to protect communities that will experience substantial increases in heavy vehicle, oversize overmass (OSOM) and workforce traffic during construction of the New England Renewable Energy Zone Network Infrastructure Project. Technical Report 7, Section 6.7.8 (printed pp. 124–125), repeatedly concludes that road safety impacts will be "localised and manageable", relying substantially on predictions that traffic will remain "free flow" or "reasonably free flow" and consequently asserting that increased construction traffic will not materially change overall crash risk. This reasoning is inadequate when assessing the safety of rural communities. The ability of a road to accommodate increased traffic without significant congestion is not evidence that it will remain safe for residents entering or exiting private driveways, children boarding school buses, agricultural machinery and livestock movements, emergency vehicles, or motorists encountering substantially increased heavy vehicle traffic on narrow roads with limited shoulders and constrained sight distances.

EnergyCo's own assessment acknowledges these existing road limitations, yet the proposed safety responses remain heavily dependent on general Traffic and Transport Management Plans, temporary signage, reduced speeds, traffic controllers, driver codes of conduct and unspecified "targeted physical works". Although specific intersection treatments are identified elsewhere in Technical Report 7, the assessment does not consistently establish precisely which physical safety measures will be implemented, where they will be located, whether they address the identified risks or when they must be completed.

Particularly concerning are inconsistencies within the exhibited technical report. At Thunderbolts Way and Salisbury Plains Road (IS_USC_09), Section 6.7.4 and Table 9-2 identify a Basic Left Turn (BAL) treatment, while Appendix G identifies an Auxiliary Left Turn (AUL) treatment. Similarly, for the Thunderbolts Way construction access IS_USC_16, Table 9-2 identifies Channelised Right Turn and Auxiliary Left Turn (CHR/AUL) treatments, while Appendix G identifies Basic Left and Basic Right (BAL/BAR) treatments. These are materially different intersection design categories, raising legitimate concerns regarding the accuracy, consistency and final adequacy of the proposed safety upgrades. EnergyCo must reconcile the report's schedules, Appendix G and the corresponding concept designs and identify the definitive treatment at each location.

Appendix G identifies existing non-compliant approach and safe intersection sight distances at several Thunderbolts Way construction accesses, including IS_USC_13 and IS_USC_14, without clearly demonstrating in the exhibited assessment how the proposed treatments will rectify or otherwise safely manage those deficiencies. The Department should require location-specific proof of the final sight distances, road geometry and approved risk controls, rather than assuming that widening or basic turning treatments automatically address all visibility constraints.

These concerns are directly relevant to the amended Secretary's Environmental Assessment Requirements (SEARs), Transport (printed p. 4), which require assessment of road safety and intersection performance and identification of necessary haulage route upgrades and mitigation measures. Transport for NSW's amended advice dated 11 February 2026 requires detailed intersection assessments, safe sight-distance reviews, swept-path analysis, consideration of agricultural harvest periods, and, for high-risk OSOM movements,

consideration of school bus routes, travelling stock routes, constrained road geometry, passing facilities and appropriate physical works. Where temporary controls are proposed instead of permanent or semi-permanent infrastructure, EnergyCo must demonstrate that the arrangements comply with the relevant road authority requirements for that site and stage of construction.

EnergyCo has also failed to demonstrate a clear, itemised assessment and response to the foreseeable road safety hazards expressly identified in the Salisbury Plains and Thunderbolts Way Community Mitigation Document emailed to EnergyCo on 5 September 2026. That document specifically requests individually assessed and appropriately engineered driveway lay-bys, widened shoulders, safe turning and deceleration areas, school bus lay-bys at affected properties, safe agricultural machinery and livestock movements, and direct consultation with affected residents before significant construction traffic commences. Despite these matters having been formally brought to EnergyCo's attention, neither Sections 6.7.8–6.7.9 nor the main EIS mitigation measures TT17–TT23 clearly demonstrate that these particular requests have been evaluated, that the required physical safety infrastructure has been agreed upon, or that its delivery has been secured. General consultation, traffic management or future assessment is not an adequate substitute for identifying and addressing known and foreseeable safety risks before exposing communities to substantially increased construction traffic.

The main EIS, Section 14.3.6 (printed p. 565), largely repeats the same assurances regarding negligible or minor safety impacts without adequately demonstrating how these conclusions protect individual rural road users and affected properties. The Department should require EnergyCo to provide a comprehensive, independently reviewed, location-specific road safety assessment across all significantly affected construction routes, together with a definitive and consistent schedule of physical safety works identifying each hazardous intersection, private property access, school bus stop, agricultural crossing, constrained road section and required mitigation treatment. The response must include reconciliation of conflicting intersection designs, verified sight-distance assessments, written responses to each safety measure requested in the 5 September 2026 mitigation document, direct consultation with affected residents, confirmed funding responsibilities and enforceable completion dates.

All necessary safety improvements must be completed before the corresponding increase in construction traffic occurs, rather than relying on future management plans, temporary measures or corrective action following a near miss or accident. The Department must not equate an uncongested road network with a safe road network and must require EnergyCo to establish through transparent engineering evidence and enforceable commitments that the safety of rural residents, schoolchildren and farming communities has been properly assessed and prioritised before construction proceeds.

> Supporting references: Technical Report 7, §5.1.2 (printed p. 49), §6.7.4 (printed pp. 112–114), §§6.7.8–6.7.9 (printed pp. 124–127), §8.5.1 (printed p. 151), Table 9-2 (printed p. 177) and Appendix G (printed pp. 261–263); main EIS, §14.3.6 (printed p. 565) and mitigation measures TT17–TT23 (printed pp. 574–575); amended SEARs, Transport (p. 4); Transport for NSW amended advice dated 11 February 2026, Attachments A and B; Salisbury Plains and Thunderbolts Way Community Mitigation Document emailed 5 September 2026.

> POSITION SOUGHT

Replace broad road-safety assurances with a location-specific hazard and treatment register for roads, intersections, buses, pedestrians, school stops and rural access points. Demonstrate independent road-safety review, vehicle-class and period-specific conflict scenarios, necessary works, funded owners and pre-traffic completion milestones.

34.1 Deferral of essential road safety evidence and failure to provide meaningful pre-approval scrutiny despite acknowledged crash risks

I raise a serious objection to EnergyCo seeking approval on the basis of future traffic management assurances while essential road safety evidence and the final form of critical safety measures remain unresolved. Technical Report 7, Section 8.7 (printed pp. 158–162), identifies the New England Highway as the dominant recorded crash corridor within its study area, and reports 30 casualty crashes in the Glenburnie Road–Armidale corridor during 2020–2024, including one fatal and 13 serious-injury crashes; a separate assessment of the Tamworth highway and intersection study area records a further 51 injury crashes, including 21 serious injuries. These are geographically distinct casualty-crash datasets, not a combined total or a traffic-adjusted crash rate, but they establish a record of severe collisions at routes and intersections proposed to carry increased project traffic. Most importantly, Section 8.7 (printed pp. 161–162) expressly recognises that additional heavy and articulated vehicles can intensify speed differentials, braking requirements, right-turn and intersection conflicts, pavement deterioration, run-off-road hazards and collision severity, and that unmanaged construction traffic would be expected to increase both crash frequency and injury severity. Despite that explicit acknowledgement, Section 10 (printed pp. 185–186) concludes that future traffic management, heavy-vehicle controls and targeted works will prevent a material increase in crash frequency or severity. Yet Table 4-2 (printed p. 29) excludes formal Road Safety Audits from the exhibited assessment and defers them to later road-design stages, while the detailed Traffic and Transport Management Plan is also deferred until after approval, before construction. The main EIS mitigation commitments TT1 and TT5 (printed pp. 570–572) similarly leave confirmation of haulage and OSOM routes and detailed operational safety controls to pre-construction planning. This is a particularly serious evidentiary gap when the report forecasts approximately 300 one-way vehicle trips per hour at peak construction, identifies 31 roads requiring upgrades, and anticipates 53 high-risk OSOM movements. It must be examined against the amended SEARs (especially pp. 2, 4 and 6), which require assessment of road safety, intersection performance, cumulative traffic, strategic concept designs, mitigation and meaningful engagement with affected landowners and communities, and Transport for NSW's amended advice of 11 February 2026 (Attachment A, pp. 2–6; Attachment B, pp. 9–10), which calls for five-year crash-data and weather/fatigue assessments, strategic concept designs, Safe Intersection Sight Distance checks, swept paths for design vehicles, worst-case overlapping traffic scenarios and specific consideration of school buses, farm and harvest traffic and other road users. Technical Report 4, Social Impact Assessment, Section 5.2.7.2 (printed pp. 136–138), separately acknowledges increased actual and perceived risks for school-bus passengers, rural residents, agricultural machinery operators and communities facing cumulative construction traffic. The Department should not determine the project on broad assurances that these known risks are 'localised and manageable' without first requiring the EIS-stage safety evidence to be made public: corridor- and intersection-specific risk assessments, strategic concept designs, crash-conflict and sight-distance reviews, heavy-vehicle swept paths, cumulative construction-traffic sensitivity testing and a funded schedule of the physical works required to rectify identified hazards. Affected residents, farmers, school bus operators, emergency services and councils must have a meaningful opportunity to examine and comment on this material before determination, with supplementary public exhibition where material assessment changes are necessary. Final detailed traffic controls and formal road safety audits may appropriately be completed at later design stages, but their scope, independent verification, enforceable approval hold points and completion before corresponding project traffic increases must be secured now. The public must not be made the test case for safety measures whose adequacy has not been demonstrated in advance. This matter cross-refers to Sections 19, 34, 38, 38.1 and 44 of this submission.

> Supporting references: Technical Report 7, Table 4-2 (printed p. 29), §8.7 (printed pp. 158–162), Chapter 10 (printed pp. 185–186), and proposed TTMP/OSOM controls in §9.1; main EIS, §14.6 and mitigation measures TT1 and TT5 (printed pp. 570–572); Technical Report 4, Social Impact Assessment, §5.2.7.2 (printed pp. 136–138); amended SEARs, General, Transport and Engagement requirements (printed pp. 2, 4 and 6); TfNSW amended advice of 11 February 2026 (Attachment A, pp. 2–6, and Attachment B, pp. 9–10). Also see this submission, Sections 19, 34, 38, 38.1 and 44.

> REQUIRED ACTION BY ENERGYCO — SECTION 34.1

EnergyCo must disclose independently reviewable road safety evidence, concept designs and unresolved risks for meaningful public scrutiny before determination, and complete any necessary audits, protective upgrades and binding traffic controls before construction traffic increases.

Before determination, publish an indexed TfNSW/SEARs compliance and unresolved-risk register, strategic road and intersection concept designs, independently reviewed crash and conflict analyses for the New England Highway and all identified high-risk construction routes, and sight-distance, swept-path and cumulative traffic assessments; make these available for meaningful consultation with affected communities and road users, with further exhibition where material new designs or impact findings arise. Require independently verified formal Road Safety Audits, approved detailed TTMPs and all necessary funded physical protections as enforceable pre-construction hold points before the relevant heavy-vehicle, workforce and OSOM traffic increases.

35 | Failure to adequately assess rural property access, agricultural impacts and the reliance on ineffective communication and engagement — Technical Report 7, Section 6.7.13 (printed pp. 128–129)

Evidence and EIS shortcomings

A key concern is EnergyCo's inadequate assessment of the impacts of construction traffic and associated works on access to private properties, particularly its assertion in Technical Report 7, Section 6.7.13 (printed pp. 128–129), that impacts on property access would be minimal due to the rural context of the project. The rural location of a property does not diminish the significance of access restrictions; rather, the reliance of farming families on limited, and frequently single, access points can make even temporary disruptions particularly serious.

Rural property entrances are essential for everyday family movements, livestock transport, agricultural machinery, veterinary services, feed deliveries, contractors, school transport, emergency vehicles and time-sensitive farming operations, including calving, lambing, livestock loading and harvesting. A restriction lasting only a short period may have substantial financial, operational or animal-welfare consequences depending on when it occurs. EnergyCo's assessment appears to concentrate on temporary physical restrictions associated with construction activities while inadequately addressing the potentially ongoing difficulties residents will experience entering and exiting their properties safely as a consequence of substantially increased heavy vehicle, OSOM and workforce traffic. A driveway remaining physically open does not mean that it remains safe or practical to use.

This distinction is especially important along Thunderbolts Way and throughout Salisbury Plains, where existing road geometry, narrow shoulders, gradients, restricted sight distances and increased heavy vehicle movements may require appropriately engineered lay-bys, widened access points, deceleration areas or alternative property entrances. These foreseeable issues were expressly identified in the Salisbury Plains and Thunderbolts Way Community Mitigation Document submitted to EnergyCo on 5 September 2026, which requested property-by-property assessments, direct consultation with affected residents and preventative mitigation before significant construction traffic commences.

Of equal concern is EnergyCo's proposed reliance on establishing a communication process with landholders as a principal means of mitigating property access impacts, despite substantial and ongoing concerns already raised regarding EnergyCo's communication, consultation and responsiveness. The correspondence documented in the formal review dated 17 October 2026 records that EnergyCo acknowledged the community mitigation submission on 7 September, indicated on 17 September that a response was being prepared, and advised in October that the matters remained under review. These recorded exchanges do not demonstrate that the individual access and safety requests had been substantively resolved. It is therefore unreasonable for EnergyCo to rely on future communication as an adequate mitigation measure without demonstrating how its engagement processes will deliver timely decisions, practical access arrangements and enforceable commitments.

The main EIS, Section 14.3.7, Table 14.4 (printed p. 566), refers to Property Specific Management Plans (PSMPs) for easement-affected properties, while mitigation measures LP2 and AG3 provide for access protocols, management of agricultural operations and consultation with directly affected landholders. However, these commitments do not clearly demonstrate how residents whose properties are not subject to transmission easements, but whose access may be substantially affected by increased construction traffic, will receive equivalent assessment, protection and mitigation.

This raises significant questions when considered against the amended Secretary's Environmental Assessment Requirements (SEARs), particularly the requirements on page 4 to assess road safety, public road capacity and site access impacts, and the engagement requirements on page 6 to consult affected landowners, identify their concerns, demonstrate how those concerns have influenced the project and provide explanations where design changes have not been made. EnergyCo's own EIS, Section 10, also commits to improved, responsive and property-specific landholder engagement, yet the exhibited assessment does not clearly demonstrate how previously identified access concerns have been resolved.

Communication is not, in itself, mitigation. Informing a farmer that access will be restricted does not remove the resulting agricultural, financial or safety consequences, nor does it provide a safe alternative route or an appropriately engineered property entrance.

The Department should require EnergyCo to undertake a comprehensive, independently reviewed, property-by-property access and agricultural continuity assessment for all significantly affected properties, including those outside the transmission easement corridor. This assessment must identify existing access arrangements, forecast construction traffic exposure, potential physical restrictions, safe turning requirements, livestock and agricultural machinery movements, emergency access, alternative access options, potential financial consequences and the physical mitigation works necessary to maintain safe and practical property access. EnergyCo must also provide a documented, itemised response to the 5 September 2026 community mitigation submission, identifying which access measures have been accepted, modified or rejected, the reasons for each decision, who will fund the works, who is accountable for delivery and when each necessary measure will be completed.

Access to rural properties is not a discretionary convenience; it is fundamental to the safety, livelihood, animal welfare and operational viability of farming families. EnergyCo must demonstrate that those needs have been properly assessed, respected and protected before construction-related traffic and access restrictions create the foreseeable impacts already brought to its attention.

> Supporting references: Technical Report 7, §6.7.4 (printed p. 110) and §6.7.13 (printed pp. 128–129); main EIS §14.3.7, Table 14.4 (printed p. 566), measures LP2 (pp. 507–508), AG3 (pp. 541–543), SO2 (pp. 408–409), and TT16–TT22 (pp. 574–575); amended SEARs (pp. 4 and 6); Uralla Shire Council amended advice of 4 February 2026 (pp. 1–2); Salisbury Plains and Thunderbolts Way community mitigation submission of 5 September 2026; and formal EIS discrepancy and mitigation review of 17 October 2026.

Further evidence and assessment gap. Agricultural biosecurity is also a road-access and traffic issue, not simply an on-property construction protocol. Repeated movements of earthmoving equipment, transport trucks and plant between separate holdings, camp sites, wash stations, laydown yards and forestry/agricultural roads can transfer weed seeds, soil-borne pathogens and pests, including the potential movement of red imported fire ants through contaminated soil or materials where an established pathway exists. The main EIS, §3.3.13.1/Table 3.11 (printed p. 138), anticipates approximately 17 ML of non-potable water for project biosecurity wash stations, demonstrating that washdowns form part of the proposed activity, but it does not by itself prove the stations' locations, adequate containment or that every required movement is captured in the road model. Affected landholders seek locally accessible, independently auditable washdown and inspection controls, vehicle/equipment movement logs, contained wastewater/soil disposal, prompt outbreak response and clear responsibility for verified project-related harm. These measures should be proportionate to biosecurity pathways and aligned with the Biosecurity Act 2015 and relevant authority advice, rather than assuming every truck presents the same risk.

> POSITION SOUGHT

Map each rural property access affected by construction, OSOM convoys or road works and assess safe farm machinery, livestock, stock-truck, biosecurity and emergency movement needs with landholders. Issue property-specific approved access and mitigation arrangements, compensation/damage contact pathways and a reasoned response to rejected proposals.

Additional requirement by EnergyCo. Publish a property- and route-specific biosecurity movement protocol identifying washdown/inspection points, material origin and clean-status records, measures for fire-ant and other declared pest pathways, treatment-water and waste disposal destinations, auditable compliance, rapid incident notification and a legally robust process for assigning and remedying evidenced project-related contamination or consequential agricultural loss. Include the washdown and disposal vehicle movements in the transport forecast.

36 | Failure to adequately assess and guarantee emergency services access, emergency response times and rural evacuation during construction — Technical Report 7, Section 6.7.14 (printed p. 129)

Evidence and EIS shortcomings

A key concern is EnergyCo's inadequate assessment of the potential impacts of construction activities, heavy vehicle movements, OSOM transport and temporary road restrictions on emergency services access and response times, particularly for isolated rural communities and agricultural properties along Thunderbolts Way, throughout Salisbury Plains and across the broader New England Renewable Energy Zone construction network. Technical Report 7, Section 6.7.14 (printed p. 129), states that emergency vehicle access will be maintained throughout construction, yet subsequently acknowledges that temporary restrictions may be necessary, with mitigation relying principally on prior consultation and communication with emergency services. This raises a fundamental question: how can EnergyCo guarantee emergency access while simultaneously proposing restrictions without clearly demonstrating the physical and operational arrangements that will ensure emergency vehicles can pass without unacceptable delay?

The reliance on communication as a primary mitigation measure is particularly concerning given the nature of emergencies, which are inherently unpredictable and cannot be scheduled around construction activities, road closures, transmission line stringing or OSOM vehicle movements. Agricultural industries involve recognised risks associated with machinery, livestock handling, heavy vehicles, working at heights and remote working environments, where serious injuries can require immediate medical intervention. Rural residents may already face substantial emergency response times because of their distance from ambulance stations, hospitals and specialist rescue services, making any additional delay potentially critical. A restriction described as temporary or minor in a traffic assessment may have life-threatening consequences when an ambulance, fire appliance or rescue vehicle needs immediate access to an isolated property.

A further concern is that EnergyCo's own Social Impact Assessment, Technical Report 4, Section 5.2.7.2 (printed pp. 136–137), expressly acknowledges that construction traffic, temporary road closures and altered travel routes may affect emergency response times, especially for residents with only one access road. Section 5.2.8.2 (printed p. 144) identifies the existing limitations of emergency health services in rural communities and the potential additional demand associated with the construction workforce. Appendix F of that report also records substantial community concern about emergency services being prevented or delayed from attending medical emergencies and natural disasters because of road closures and the movement of large equipment. Despite these acknowledged risks, Technical Report 7 does not clearly demonstrate a location-specific assessment of emergency response delays, alternative access routes, emergency vehicle clearance arrangements, evacuation requirements or procedures for managing an unexpected emergency during an OSOM movement or road closure.

The main EIS, Section 14.3.7, Table 14.4 (printed p. 566), largely repeats the same assurances, while mitigation measures TT1, TT16 and TT21 provide for future emergency service consultation, notification of disruptions and maintenance of emergency access. However, the exhibited commitments do not clearly establish how these measures will be implemented or verified at each significantly affected location. More concerning is the apparent inconsistency with the main EIS, Section 17.3.4.3 (printed p. 664), which concludes that the project would not adversely affect regional or landholder evacuation capability, while Section 24.2.2.12 (printed p. 803) acknowledges that increased heavy construction vehicle movements, traffic restrictions and roadworks may affect emergency access, evacuation routes and firefighting operations, with these impacts to be managed through a future Emergency Plan. These statements require reconciliation, particularly where rural roads have narrow carriageways, restricted passing opportunities, limited alternative access and significant cumulative construction traffic.

The amended Secretary's Environmental Assessment Requirements (SEARs), pp. 4–5, require assessment of road safety, site access, public safety, bushfire risks and emergency egress and evacuation. Transport for NSW's amended advice dated 11 February 2026 also establishes specific requirements for the design of emergency access points at relevant State-road interfaces, including emergency vehicle accommodation and safe sight distances. The Department should require EnergyCo to undertake an independently reviewed, road-by-road Emergency Access and Rural Evacuation Assessment in direct consultation with NSW Ambulance, NSW Rural Fire Service, Fire and Rescue NSW, NSW State Emergency Service, NSW Police, relevant road authorities and affected landholders.

This assessment must identify every location where construction activities, OSOM movements, traffic controls or road closures could restrict emergency access; evaluate the potential consequences for ambulance response times, patient transport, firefighting, rescue operations and rural evacuation; and establish practical and enforceable arrangements for immediate emergency vehicle priority, rapid suspension of construction activities, safe clearance of OSOM vehicles, alternative access routes, traffic-controller responsibilities and emergency communication procedures. Particular attention must be given to isolated agricultural properties, single-access roads, livestock and machinery accidents, bushfire evacuation and emergencies occurring outside normal construction hours.

All necessary physical works, emergency access protocols and contingency arrangements must be established, agreed with the relevant emergency service agencies and operationally verified before construction traffic or road restrictions commence. EnergyCo must not be permitted to rely on broad promises of future consultation or a communication strategy as sufficient evidence that rural communities will remain protected. The Department should require EnergyCo to demonstrate, through detailed and enforceable emergency management arrangements, that its construction activities will not introduce unacceptable risks to emergency response, property evacuation or public safety. The lives and safety of rural residents, farming families and emergency service personnel must take precedence over construction scheduling and the efficient movement of project vehicles.

> Supporting references: Technical Report 7, §6.7.14 (printed p. 129); main EIS §14.3.7, Table 14.4 (printed p. 566), measures TT1 (p. 570), TT16 and TT21 (pp. 574–575), §17.3.4.3 (p. 664) and §24.2.2.12 (p. 803); Technical Report 4, Social Impact Assessment, §§5.2.7.2 (pp. 136–137) and 5.2.8.2 (p. 144), and Appendix F (p. 47); amended SEARs (pp. 4–5); Transport for NSW amended advice dated 11 February 2026, Attachment A (pp. 3–4).

> POSITION SOUGHT

Secure an emergency-services-reviewed route and response plan for each construction stage and OSOM convoy, showing access to residences and farms, fire appliances, ambulances, evacuations and alternatives during closures. Set maximum closure thresholds, escalation protocols, notification responsibilities and enforceable stop-work triggers.

37 | Failure to adequately assess long-term operational traffic, maintenance vehicle movements, road maintenance obligations and agricultural property access — Technical Report 7, Chapter 7 (printed pp. 130–132)

Evidence and EIS shortcomings

A key concern is EnergyCo's inadequate assessment of the long-term traffic, road infrastructure, maintenance and property access impacts associated with the operation of the New England Renewable Energy Zone Network Infrastructure Project, particularly its repeated assertions in Technical Report 7, Chapter 7 (printed pp. 130–132), that operational impacts will be negligible or minimal. These conclusions appear to rely heavily on assumptions about low volumes of routine maintenance traffic without adequately demonstrating that the full range of foreseeable operational activities, heavy vehicle movements, emergency repairs, infrastructure replacements and long-term road maintenance obligations has been assessed.

Section 7.2 estimates that maintenance personnel travelling from the proposed Nemingha maintenance facility would generate a maximum of five light vehicle trips across the road network. However, the main EIS, Section 3.4.4 (printed p. 143), identifies an operational workforce of up to 100 personnel, while Section 3.4.1 (printed pp. 141–142) acknowledges that transmission line maintenance may require multiple crews, elevated work platforms, medium-sized trucks, specialised equipment and unplanned emergency repairs following infrastructure failures or severe weather events. Although the broader operational workforce would not necessarily travel simultaneously, EnergyCo has not clearly demonstrated how its limited routine vehicle movement assumptions account for the full operational workforce, geographically dispersed maintenance activities, heavier repair vehicles, emergency works or periods of increased maintenance demand.

A further concern is the apparent inconsistency regarding the proposed maintenance facility access at Nundle Road, Nemingha (IS_TRC_78). Section 7.2 (printed p. 130) states that no auxiliary turn treatments or intersection upgrades are considered necessary, while Table 9-2 (printed p. 175) identifies widening to accommodate vehicle turning movements, and Appendix G (printed p. 257) refers to the proximity of a bridge and a proposed three-point turning manoeuvre for an OSOM vehicle. A conclusion that no auxiliary turn lane is necessary may be consistent with localised driveway widening, but the documents must distinguish these outcomes clearly. EnergyCo must reconcile these descriptions and provide the definitive engineering design, relevant vehicle swept-path assessments and an explanation of the physical works required to ensure safe access throughout the facility's operational life.

Section 7.3 (printed p. 131) acknowledges that newly constructed access tracks, roads and public road connections will require ongoing inspections, grading, surface repairs, drainage maintenance and vegetation management, yet does not clearly identify the specific road sections affected, required maintenance standards, inspection frequencies, funding arrangements, repair obligations or parties responsible for maintaining these assets. This is particularly concerning because the main EIS, Section 3.5 (printed p. 143), anticipates an operational life of approximately 50 years, potentially longer with ongoing maintenance and infrastructure upgrades. The amended Secretary's Environmental Assessment Requirements (SEARs), page 4, expressly require details of the ongoing maintenance works necessary to service project assets, including measures to maintain roads. A general assurance that repairs will occur on an as-required basis does not adequately demonstrate how these obligations will be funded, monitored or enforced over several decades.

The assessment also insufficiently demonstrates how the continued use of private roads, agricultural access tracks and newly established project entrances will affect farming operations throughout the operational phase. Section 7.7 (printed p. 132) states that property access will generally be preserved and that consultation will occur where temporary restrictions are necessary. However, the main EIS, Section 3.4.3 (printed p. 143), confirms that existing public and private roads and retained construction tracks will continue to be used for operational maintenance, including access by larger vehicles when repairs and upgrades are required. This raises legitimate concerns regarding interference with livestock movements, agricultural machinery, fencing, gates, biosecurity requirements, property access, road damage and emergency operations. For farming families, the obligation to accommodate project maintenance activities may continue for the operational life of the transmission infrastructure, and these impacts cannot be adequately addressed through general promises of prior consultation alone.

Similarly, Section 7.8 (printed p. 132) predicts negligible impacts on emergency services while acknowledging that temporary access restrictions may still be necessary, without clearly demonstrating how emergency vehicle access and rural evacuation will be protected during unexpected or major maintenance activities. Transport for NSW's amended advice dated 11 February 2026 expressly requires traffic generation, vehicle types, access arrangements and route assessments for the operational and decommissioning phases. Although the main EIS anticipates that eventual decommissioning could occur over approximately two years, Chapter 7 does not provide a clearly quantified assessment of the potentially substantial heavy vehicle movements required for major infrastructure removal or replacement.

The Department should require EnergyCo to provide a comprehensive, independently reviewed operational traffic and road infrastructure management assessment covering the full anticipated life of the project. This assessment must reconcile the operational workforce and vehicle movement assumptions, quantify routine and non-routine maintenance traffic, identify the types and frequencies of heavy vehicles required for major repairs and emergency works, clarify the proposed Nundle Road maintenance facility upgrades, and provide road-specific maintenance plans supported by funded, enforceable obligations for inspections, repairs, drainage, pavement condition and long-term asset protection. EnergyCo must also provide written property-specific operational access arrangements for affected landholders, addressing agricultural activities, livestock movements, biosecurity, infrastructure damage, emergency access and the responsibilities of the

future Network Operator. The Department should additionally require a clearly defined framework for assessing and managing future major upgrades and decommissioning traffic.

The permanent presence of this infrastructure creates long-term obligations, and the financial, operational and safety consequences must not be transferred to rural communities, agricultural landholders or local councils. The Department must require transparent engineering evidence and enforceable commitments establishing how roads, property access and community safety will be protected not merely during routine inspections, but throughout the entire operational life of the New England Renewable Energy Zone Network Infrastructure Project.

> Supporting references: Technical Report 7, Chapter 7, §§7.1–7.8 (printed pp. 130–132), Table 9-2 (printed p. 175), Appendix G (printed p. 257), and §9.1.5 (printed p. 167); main EIS §§3.2.6–3.2.7 (printed pp. 92–94), §§3.4.1–3.4.4 (printed pp. 141–143), §3.5 (printed p. 143), §14.4 (printed pp. 567–569) and relevant mitigation measures in Table 14.6; amended SEARs (printed pp. 4–5); Transport for NSW amended advice dated 11 February 2026, Attachment A (pp. 2–6).

> POSITION SOUGHT

Provide a road- and property-specific operational and future decommissioning traffic assessment, including routine and emergency repair plant, heavy-vehicle routes, access permissions and ongoing road maintenance. Establish funded, enforceable long-term asset, farm-access, safety and reinstatement obligations rather than deferring these to future plans.

38 | Failure to identify and adequately assess foreseeable renewable energy developments and their cumulative traffic, road safety and agricultural impacts on Uralla, Salisbury Plains and Walcha — Technical Report 7, Chapter 8 (printed pp. 133–152)

Evidence and EIS shortcomings

A key concern is the apparent incompleteness of EnergyCo's Cumulative Impact Assessment contained in Technical Report 7, Chapter 8, particularly its failure to identify and adequately consider a number of substantial renewable energy developments proposed within Uralla Shire and the Salisbury Plains district. These developments have the potential to contribute significantly to the cumulative construction traffic, heavy vehicle movements, OSOM transport, road deterioration, agricultural disruption and community safety impacts already anticipated from the New England Renewable Energy Zone Network Infrastructure Project. A further concern is that EnergyCo's Table 8-1 does not identify five major developments that have progressed through the NSW State Significant Development planning system: Deeargee Solar (SSD-70753725), Hillview Solar Farm (SSD-72447960), Hillview Wind Farm (SSD-78329994), Eastern Hub Firming Battery (SSD-71860708), and Balala Wind Farm (SSD-143456490). All five were identified on the NSW Planning Portal as being at the Prepare EIS stage as at October 2026. These are not merely hypothetical developments; they are publicly registered proposals of considerable scale, each capable of generating construction-related transport demands should it proceed. Significantly, Uralla Shire Council had already identified these five developments in its formal submission to the NSW Parliamentary Inquiry into the Impact of Renewable Energy Zones on Rural and Regional Communities and Industries, received on 6 February 2025. Therefore, the existence of these projects was a matter of public record well before EnergyCo finalised Technical Report 7 in September 2026. EnergyCo must explain why developments already identified by the local council and progressing through the State's planning system were absent from its cumulative project register,

particularly when Section 8.1 states that the register was compiled using council development information, the NSW Major Projects Planning Portal and information available to the EIS team in March 2026.

The geographical concentration of these proposals is especially concerning. Hillview Solar Farm, Hillview Wind Farm and the Eastern Hub Firming Battery are proposed in the Hillview Road and Salisbury Plains locality, while Deeargee Solar is proposed in the nearby Gostwyck area, with potential construction access routes involving roads already relevant to the REZ transmission project. The proposed development scale includes a 272 MW solar farm, a wind farm of up to 55 turbines, a 1,000 MW battery energy storage system, and Deeargee's proposed 320 MW solar development and associated battery infrastructure. Balala Wind Farm, involving up to 60 turbines and associated infrastructure, is proposed elsewhere within Uralla Shire and must be assessed for any interaction with regional construction routes, workforce travel and freight movements rather than being assumed to affect the same Salisbury Plains roads. The combination of multiple substantial developments in and around a relatively small rural community creates a foreseeable potential concentration of impacts that cannot be adequately understood by examining EnergyCo's project in isolation or relying solely on broad regional road-network capacity calculations. This is particularly relevant to Thunderbolts Way, Salisbury Plains Road, Hillview Road, Gostwyck Road, Carlon Menzies Road and their connections with the New England Highway, subject to confirmation of each developer's final haulage and workforce routes. These roads serve farming families, rural residences, school transport, livestock operations, agricultural machinery and emergency services. Any additional construction traffic must therefore be assessed against the actual physical capacity, condition and safety characteristics of individual roads, intersections, bridges, culverts, driveways and passing locations.

The concern is heightened by EnergyCo's own cumulative traffic forecasts. Technical Report 7, Section 8.5.1, printed page 151, predicts increases of up to approximately 400 vehicles per day on Thunderbolts Way during the modelled January 2030 cumulative period and up to approximately 790 additional vehicles per day on the New England Highway between Armidale and Uralla. These figures have been presented without clearly demonstrating the additional traffic exposure that could result if the five omitted developments proceed during overlapping construction periods. EnergyCo's assessment also focuses on two principal cumulative modelling periods, January 2030 and late 2030, but a network-wide peak does not necessarily represent the highest-impact period for individual communities or road sections. The combined effects on Salisbury Plains could be greatest at a different time if construction activities associated with the proposed local solar, wind, battery and transmission developments overlap. Section 8.4.1 suggests that overlapping OSOM movements would be minimal because developments are widely distributed across the study area. That assumption must be reconsidered for the geographically concentrated developments around Salisbury Plains and Uralla, where several projects may depend upon common regional roads, intersections, freight routes and access infrastructure. While the eventual approval, timing and transport routes of the five proposals remain uncertain, these uncertainties do not justify disregarding their potential impacts. They instead strengthen the case for transparent sensitivity testing and reasonable alternative construction scenarios.

A further substantive discrepancy within the cumulative-project evidence concerns the Baiada Integrated Poultry Processing Facility at Westdale, Tamworth. Technical Report 7, Table 8-1 (printed p. 137), places this industrial poultry-processing development under the heading “Within NE REZ” and incorrectly states that “Construction of the solar farm” would take approximately 33 months. Baiada is a poultry-processing facility, not a solar farm (NSW Major Projects application SSD-9394), and its new Tamworth processing plant officially opened on 16 September 2026, before the date of Technical Report 7 (28 September 2026). Despite this, Table 8-2 (printed p. 148) assigns the Baiada facility 590 additional daily construction vehicle movements in the January 2030 cumulative scenario and 642 in the late-2030 scenario. These are material traffic-model inputs, not merely an inconsequential labelling error. The published report does not explain whether a separately verified future construction stage is expected to generate these movements in 2030,

whether completed construction has been mistaken for future construction, or whether ongoing operational poultry, freight and workforce traffic has been incorrectly classified as construction traffic. The distinction matters: an unsupported construction overlap can affect both the magnitude and geographical distribution of cumulative traffic, distort the selection of worst-case periods, and undermine confidence in the screening of other foreseeable developments. The apparent use of generic "solar farm" descriptions against other non-solar projects in Table 8-1, including energy-storage and wind developments, reinforces the need for a project-by-project source and quality-assurance audit rather than reliance upon unverified template text. EnergyCo must identify the original source, verification date, approved works and actual construction status for Baiada; explain the 33-month assumption and the 590/642 daily construction movements; distinguish operational movements from construction movements; justify the "Within NE REZ" categorisation; correct any project-type or staging errors; and republish Tables 8-1 and 8-2 with a transparent explanation of whether Sections 8.4–8.10 and the downstream road and intersection forecasts change. Until those matters are reconciled, the Department should not accept the two 2030 cumulative snapshots as sufficiently reliable evidence that all reasonably foreseeable road safety and community impacts have been assessed.

The amended Secretary's Environmental Assessment Requirements (SEARs), page 4, expressly require a cumulative assessment of traffic from nearby developments, together with assessment of public road capacity and condition, road safety, intersection performance, heavy vehicle movements and appropriate mitigation measures. Transport for NSW's amended advice dated 11 February 2026 also requires cumulative traffic assumptions to be considered in relevant intersection and access assessments. Importantly, the NSW Government's Cumulative Impact Assessment Guidelines for State Significant Projects, updated March 2026, Section 3.4, pages 16–17, require proponents to identify relevant future projects, explain why reasonably foreseeable developments have been excluded and monitor emerging development proposals that may become relevant during preparation of an EIS. Although the Prepare EIS status of these five projects does not automatically require the same detailed numerical modelling as an approved development or one already under formal assessment, it does require a credible explanation of their exclusion and an appropriate response to any material potential overlap. EnergyCo's assessment does not clearly demonstrate that such a screening process, exclusion justification or localised sensitivity assessment has been undertaken for these five developments. The omission is particularly concerning when considered alongside EnergyCo's acknowledged cumulative traffic contributions from Central Hub B, East Hub, Winterbourne Wind Farm, Thunderbolt Wind Farm and New England Solar Farm Stage 2. New England Solar Farm Stage 2 is included in the existing assessment; however, its construction staging and traffic assumptions should also be reviewed against the latest available approved project information.

The Department should require EnergyCo to undertake a revised, independently reviewed and publicly available cumulative traffic and transport assessment specifically addressing Uralla, Salisbury Plains and Walcha before any determination of the New England REZ Network Infrastructure Project. This assessment must identify and document the planning status, proposed construction duration, workforce numbers, likely haulage routes and potential traffic generation of Deeargee Solar, Hillview Solar Farm, Hillview Wind Farm, Eastern Hub Firming Battery and Balala Wind Farm, and provide itemised written reasons for any development excluded from detailed modelling. It must also reconcile the assumptions for other known developments already included in the assessment, particularly New England Solar Farm Stage 2 and Winterbourne Wind Farm. Where reliable forecasts are not yet available, EnergyCo must undertake reasonable scenario and sensitivity assessments, including overlapping construction periods, alternative project commencement dates, variations in workforce movements and combined heavy vehicle and OSOM activity. The assessment must separately identify projected daily and peak-hour traffic volumes for relevant sections of Thunderbolts Way, Salisbury Plains Road, Hillview Road, Gostwyck Road, Carlon Menzies Road, the New England Highway and other affected routes, without assuming that every proposal will necessarily use the same road. It must also evaluate the combined consequences for school bus operations, safe property access, agricultural machinery and livestock transport, emergency services, intersection safety,

road pavement deterioration, bridge and culvert capacity, passing opportunities, construction fatigue and the ongoing viability of farming operations. Any additional road upgrades, property entrance treatments, bus lay-bys, emergency access arrangements, maintenance contributions and other necessary mitigation must be identified, funded, allocated to responsible parties and scheduled for completion before the relevant increases in construction traffic occur. The Department should require meaningful consultation with Uralla Shire Council, Walcha Council, Transport for NSW, affected landholders, school bus operators and emergency services, with opportunities for the community to examine and respond to any materially revised traffic assessment.

The residents of Salisbury Plains and surrounding rural communities must not be expected to absorb the combined impacts of several major renewable energy developments when the traffic assessment used to inform approval has not clearly accounted for their foreseeable interaction. A road may appear to have sufficient capacity when projects are considered individually, yet become unsafe or unfit for existing agricultural and community use when multiple construction programs operate concurrently. EnergyCo must demonstrate that its assessment reflects the real concentration of development proposed for Uralla and Salisbury Plains, rather than presenting an incomplete project register and regional traffic averages as sufficient evidence that cumulative impacts will be manageable. The Department should require this deficiency to be addressed through an updated, transparent and location-specific cumulative assessment, supported by practical and enforceable mitigation, before relying upon EnergyCo's conclusions about road capacity, community safety or the acceptability of construction traffic impacts.

> Supporting references: Technical Report 7, Chapter 8, Sections 8.1–8.5, Table 8-1 (printed pp. 134–140), Table 8-2 (printed pp. 147–148) and Section 8.5.1 (printed p. 151); main EIS, Chapters 14 and 24; amended SEARs (p. 4); Transport for NSW amended advice dated 11 February 2026; NSW Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026), Section 3.4 (pp. 16–17); Uralla Shire Council, submission to NSW Parliamentary Inquiry into the Impact of Renewable Energy Zones on Rural and Regional Communities and Industries (received 6 February 2025); NSW Major Projects Planning Portal records: SSD-70753725, SSD-72447960, SSD-78329994, SSD-71860708 and SSD-143456490. Additional discrepancy: Technical Report 7, Table 8-1 (printed p. 137) and Table 8-2 (printed p. 148); NSW Planning Portal, Baiada Integrated Poultry Processing Facility (SSD-9394, approval 18 December 2020); Food & Drink Business, “Baiada opens major Tamworth poultry plant”, 16 September 2026 (official opening and operational launch).

Further evidence and assessment gap. The cumulative screening also needs to address Wala Wala (Dungowan Valley) Pumped Hydro near Ogunbil in Tamworth Regional LGA (SSD-138320740; EPBC 2026/10620). NSW Planning Portal records show it is a live State significant development preparing an EIS, while the Commonwealth referral indicates a possible early-2029 commencement of main works, subject to approval, and construction lasting approximately four to five years. The proposed upper-reservoir approach is via Nowendoc Road and the lower-reservoir approach via Dungowan Dam Road; the referral also contemplates a new 330 kV connection near Bendemeer, with a possible alternative interaction with the proposed New England REZ infrastructure. There is no basis at present to assert that every Wala Wala truck will use the Network Infrastructure Project's selected routes or that its workforce camps are finalised. There is, however, a clearly foreseeable need to screen road sharing, enabling and peak works, workers' accommodation, OSOM plant, alternative 330 kV connections and congestion at roads used by both schemes (NSW Planning Portal SSD-138320740; EPBC referral 2026/10620).

Further supporting evidence. Tamworth Regional Council's Port Stephens Cutting Upgrade is another potential route-disruption dependency. Council documentation describes upgrading an approximately five-kilometre section of Nowendoc Road between Ogunbil and Weabonga roads, including widening, pavement, safety barriers and drainage, while the 2026–27 draft operational plan includes funding for the major upgrade. Community transport observations describes a possible 12–18 month closure around 2028–29 and diversion toward Walcha or Forest Way. The existence of the upgrade is independently documented, but a complete closure, its exact dates and the specific diversion plan have not been verified in the material reviewed; earlier Council documentation gave other timeframes. EnergyCo should obtain current, written advice from Tamworth Regional Council and the road authority on approved staging, partial or full closure, weather-driven extensions, detour routes and their effects on emergency trips, agricultural freight, school transport, tourism, site workers and local road damage. A sensitivity case should test a prolonged closure

during REZ construction if such an overlap is reasonably possible, rather than present that scenario as certain.

> POSITION SOUGHT

Publish a dated cumulative development register and individual inclusion/exclusion decisions for Balala Wind, Hillview Solar, Hillview Wind, Eastern Hub Firming Battery and Deeargee Solar, verifying planning status, actual likely haulage routes and realistic build scenarios. Recalculate affected forecasts or conduct transparent sensitivity testing and expose the revision for agency and community review. Independently verify the actual construction and operational status of the Baiada Integrated Poultry Processing Facility, explain the 2030 construction traffic allocations of 590 and 642 movements per day, correct project descriptions and assumptions in Tables 8-1 and 8-2, and recalculate any affected cumulative traffic and intersection results.

Additional requirement by EnergyCo. Expand the Chapter 8 cumulative-project register to screen Wala Wala (SSD-138320740/EPBC 2026/10620) and the Port Stephens Cutting Upgrade, with sourced decisions on inclusion and explicit reasons if excluded. Request up-to-date developer, Council and road-authority programs; model plausible year-by-year overlapping peaks, changing haul routes, Nowendoc/Dungowan/Nundle/Bendemeer roads, emergency and livestock freight diversions, and any partial/full road closure scenarios, separately distinguishing verified commitments from proposals.

38.1 Potential serious underestimation of cumulative OSOM vehicle movements due to the exclusion of five major renewable energy developments — Technical Report 7, Section 8.4 (printed pp. 148–151)

A key concern is the accuracy, completeness and reliability of EnergyCo's cumulative Oversize and Overmass (OSOM) trip generation assessment presented in Technical Report 7, Section 8.4, pages 148–151. The exclusion of five substantial renewable energy developments proposed within Uralla Shire — Balala Wind Farm (SSD-143456490), Hillview Wind Farm (SSD-78329994), Hillview Solar Farm (SSD-72447960), Eastern Hub Firming Battery (SSD-71860708) and Deeargee Solar (SSD-70753725) — raises serious questions about whether EnergyCo has materially underestimated the potential cumulative OSOM movements affecting Uralla, Salisbury Plains and surrounding rural communities. Particularly concerning is EnergyCo's own methodology in Table 8-3, which estimates approximately 13 to 14 OSOM turbine-component movements per wind turbine. Balala Wind Farm proposes up to 60 turbines and Hillview Wind Farm proposes up to 55 turbines. Applying EnergyCo's lower benchmark of 13 movements per turbine produces an illustrative 1,495 OSOM turbine-component deliveries if both developments proceed at their maximum proposed scale, before accounting for additional transformers, cranes and other specialised equipment. This potential volume is comparable to the 1,547 turbine-component movements EnergyCo has estimated for Winterbourne Wind Farm in Table 8-6. While these additional movements cannot presently be treated as confirmed traffic forecasts, and their ultimate timing and routes remain uncertain, the potential scale is too significant to dismiss without documented justification and appropriate cumulative scenario modelling. The omission of Hillview Solar Farm, Eastern Hub Firming Battery and Deeargee Solar further raises concerns regarding the potential movement of large transformers, battery infrastructure, electrical equipment and associated heavy vehicles. EnergyCo's statement in Section 8.4.1 that overlapping OSOM activity is expected to be minimal because projects are widely distributed across the study area is particularly questionable when applied to the geographical concentration of proposed developments around Salisbury Plains. A network-wide assessment cannot substitute for a detailed examination of the cumulative pressure potentially placed on Thunderbolts Way, Salisbury Plains Road, Hillview Road, Gostwyck Road, Carlon Menzies Road and their connections with the New England Highway, subject to confirmation of individual project transport routes.

The assessment must also consider the cumulative effects of OSOM escorts, temporary road closures, restricted passing opportunities, bridge and culvert limitations, agricultural machinery movements, school bus operations, private property access and emergency response times. Of additional concern is an apparent calculation discrepancy in Table 8-4, which identifies 18 turbines and 14 components per turbine for Kyoto Wind Farm but records only 234 turbine-component movements rather than the calculated 252, requiring clarification of the underlying methodology. The amended Secretary's Environmental Assessment Requirements, page 4, expressly require assessment of cumulative traffic impacts from nearby developments, road capacity and condition, intersection safety and measures to manage high-risk heavy vehicle movements. The Department should require EnergyCo to independently review and revise Section 8.4, explain the exclusion of the five identified developments, verify its OSOM calculations and undertake realistic sensitivity assessments incorporating potential overlapping construction periods and shared transport routes. This must include location-specific assessments of peak daily OSOM movements, transport scheduling, escort arrangements, road occupancy durations and the necessary road infrastructure upgrades. EnergyCo must not be permitted to rely on conclusions that cumulative OSOM impacts will be minimal or manageable without first demonstrating that its assessment adequately considers the foreseeable scale and geographical concentration of renewable energy developments proposed for Uralla and Salisbury Plains. The potential consequences of underestimating these movements will not be borne by a traffic model, but by the farming families, school children, emergency services and rural communities required to use these roads throughout construction.

> Supporting references: Technical Report 7, §8.4 and Tables 8-3–8-7 (printed pp. 148–151), §8.5.1 (printed p. 151); amended SEARs, Transport (printed p. 4); Transport for NSW amended advice of 11 February 2026; NSW Major Projects Planning Portal records for SSD-143456490, SSD-78329994, SSD-72447960, SSD-71860708 and SSD-70753725. The turbine-component calculation is illustrative, not a traffic forecast or proof that any particular roads will carry those loads.

> REQUIRED ACTION BY ENERGYCO — SECTION 38.1

Recalculate the cumulative OSOM component and specialised heavy-vehicle scenarios in §8.4, including the five additional proposals where relevant, road-by-road and year-by-year. Reconcile turbine-component assumptions and apparent arithmetic differences (including Kyoto), distinguish indicative benchmark trips from confirmed movements, and identify cumulative crossing, passing and escort measures.

39 | Consequential cumulative intersection, safety, school transport and OSOM impacts

Evidence and EIS shortcomings

Technical Report 7, §§8.6–8.10, draws cumulative conclusions about intersections, road safety, pedestrians, cyclists, school bus services and OSOM operations. This section addresses the reliability of those downstream conclusions if the input project register, traffic distribution or assumed construction overlaps must be amended, as discussed in Sections 38 and 38.1.

In particular, the cumulative intersection assessment requires a route-specific explanation for Uralla, Salisbury Plains, Thunderbolts Way and other affected local junctions, not solely selected New England Highway intersections (§8.6). The report's discussion of crash exposure (§8.7), pedestrian and cyclist interactions (§8.8), school bus effects (§8.9) and OSOM infrastructure needs (§8.10) must be retested against

corrected forecasts and credible high-exposure local periods. Traffic volumes alone cannot establish that a narrow road or non-compliant rural access remains safe.

The central test is whether the existing conclusions and proposed treatments remain valid after any identified data omissions or overlap assumptions are corrected. Necessary physical works, timing restrictions, school-bus and farm-access safeguards and emergency provisions must be allocated to responsible parties and completed before their relevant traffic increases.

> POSITION SOUGHT

Re-run the §8.6–8.10 cumulative intersection, crash/conflict, pedestrian/cyclist, school bus and OSOM analyses wherever revised inputs could change results. Publish the local junctions and routes tested, before/after figures, any changed risk rating, required works, accountable parties and delivery milestones.

40 | Deficiencies in Proposed Traffic Management and Mitigation Measures and Failure to Demonstrate Alignment with Relevant Road Authority Requirements

Evidence and EIS shortcomings

> References: Technical Report 7, Sections 9.1–9.1.6 (printed pp. 165–167); EIS Chapter 14, Section 14.6 and Table 14.6; Amended SEARs dated 7 April 2026; Transport for NSW advice dated 11 February 2026; Uralla Shire Council advice dated 4 February 2026; Armidale Regional Council advice dated 11 February 2026.

Serious concerns arise regarding the adequacy of the traffic management and mitigation measures proposed in Sections 9.1.1–9.1.6 of Technical Report 7, particularly when those measures are considered against the requirements and advice of road authorities and the potentially incomplete cumulative traffic assessment addressed in Sections 38, 38.1 and 39 of this submission.

A further concern is the explicit requirement contained in Transport for NSW's advice of 11 February 2026 that turn-warrant assessments incorporate cumulative traffic volumes from relevant projects at EIS and approved stages. Five substantial renewable energy and storage developments identified earlier in this submission do not appear to have been individually incorporated into the cumulative project register. EnergyCo must demonstrate whether their contributions have been accounted for in the relevant traffic models and, where they have not, justify their exclusion.

This issue has direct consequences for the proposed mitigation measures. The adequacy of intersection treatments, road widening, passing opportunities, school bus arrangements, heavy vehicle scheduling and OSOM route upgrades cannot be determined reliably where relevant cumulative traffic demands have not been established.

Further concern arises from EnergyCo's reliance on future management plans, construction scheduling, traffic control measures and consultation to address impacts identified in the assessment. While these measures form an important part of construction traffic management, they must not be relied upon as substitutes for necessary physical infrastructure upgrades or as evidence that existing roads and intersections are suitable without detailed verification.

Transport for NSW has identified specific assessment requirements concerning turning movements, safe intersection sight distance, swept-path analyses, rural agricultural harvest periods, OSOM movements, road upgrades and construction-stage access. EnergyCo should demonstrate how these requirements have been satisfied for every relevant State-road interface.

Uralla Shire Council has expressly identified the need for baseline road and bridge condition assessments, clarity regarding road upgrades, construction access and the maintenance and reinstatement of Council-managed infrastructure. These matters warrant location-specific responses rather than reliance upon general project-wide commitments.

The proposed road condition management measures also require clarification. Where several renewable energy developments use the same road network, there must be a transparent, enforceable arrangement for determining existing road condition, monitoring deterioration, allocating responsibility for damage and funding necessary maintenance and improvements.

The Department should also require EnergyCo to explain how its infrastructure-planning and coordination functions will be exercised in practice to manage the cumulative traffic impacts of overlapping renewable energy developments, having regard to the governance and coordination concerns raised by Armidale Regional Council.

It is requested that the Department require EnergyCo to provide a comprehensive mitigation responsibility and compliance schedule identifying, for each affected road, intersection and access point:

1. The revised cumulative traffic assumptions and relevant construction scenarios.
2. The mitigation or infrastructure works required and the technical standards applied.
3. The responsible road authority and relevant approval requirements.
4. The organisation responsible for funding, constructing, maintaining and monitoring each mitigation measure.
5. The required consultation with councils, affected landholders, school bus operators and emergency services.
6. The dates by which measures must be completed, particularly where upgrades are necessary before increased construction traffic.
7. The proposed monitoring requirements, reporting arrangements and enforceable triggers for additional mitigation.

The necessary physical works, management responsibilities, road authority requirements and consultation arrangements must be demonstrated with sufficient certainty before the adequacy of the proposed mitigation framework can be determined.

The residents and farming families of Uralla and Salisbury Plains should not be left to discover during construction that the roads and intersections on which they depend were assessed using incomplete traffic information, or that essential upgrades and safety measures were deferred without confirmed funding or responsibility.

> POSITION SOUGHT

Convert all proposed traffic mitigation into an enforceable road-by-road implementation plan with measurable performance criteria, site checks, trigger values, monitoring frequency, reporting, responsible managers, enforcement and escalation when controls do not work; reconcile the plan with TfNSW and council requirements.

41 | Failure to Adequately Demonstrate Avoidance and Mitigation of Community Impacts from Construction Traffic

Evidence and EIS shortcomings

> References: Technical Report 7, Section 9.2 (printed p. 167) and Chapter 7; main EIS Chapters 14 and 24; amended SEARs dated 7 April 2026; Transport for NSW advice dated 11 February 2026; Uralla Shire Council advice dated 4 February 2026; Armidale Regional Council advice dated 11 February 2026; formal Salisbury Plains community mitigation request emailed to EnergyCo on 5 September 2026.

Serious concerns are raised regarding EnergyCo's treatment of community impacts in Section 9.2 of Technical Report 7, particularly its reliance on general communication arrangements, geographically distributed traffic forecasts and assertions that operational traffic impacts will be negligible.

The approach outlined in Section 9.2 does not adequately demonstrate how the foreseeable consequences of increased heavy vehicle, OSOM, workforce and cumulative construction traffic will be avoided or mitigated for the rural communities most directly affected by these activities.

The assertion that traffic increases will generally be low and distributed across a large geographical network fails to address the disproportionate impact that concentrated construction traffic can have on individual rural roads, farming communities and residential properties.

A network-wide assessment does not establish that the impacts experienced along Thunderbolts Way, within Salisbury Plains or at rural property entrances will be acceptable.

reliance on Chapter 7's conclusion of negligible operational traffic impacts is not an adequate response to concerns regarding construction activity. The comparatively limited traffic associated with normal operation of the completed transmission infrastructure must be clearly distinguished from the substantial construction and cumulative traffic movements considered elsewhere in the EIS.

EnergyCo was formally notified of specific foreseeable community impacts in the Salisbury Plains community mitigation document emailed on 5 September 2026.

That document identified affected properties and requested detailed mitigation relating to road safety, rural property access, school bus lay-bys, residential noise, double and triple glazing, vegetation screening, drainage, agricultural operations, livestock disturbance and the cumulative loss of rural amenity.

These were not hypothetical or generic concerns. They were detailed requests relating to identifiable locations, submitted directly to EnergyCo for consideration before construction impacts occur.

Despite this prior notification, Section 9.2 provides no clear property-specific reconciliation of the issues raised, no explanation of which requested measures have been accepted or rejected, and no comprehensive schedule identifying the assessment, funding, implementation and monitoring responsibilities for the requested mitigation.

The amended SEARs require an assessment of relevant environmental, economic, social and cumulative impacts, together with appropriate mitigation and an explanation of how issues raised during engagement have informed project development.

Transport for NSW has specifically required detailed traffic assessments incorporating cumulative project traffic at relevant intersections, appropriate intersection treatments, road safety considerations and rural agricultural traffic conditions.

Uralla Shire Council has requested assessment of baseline road and bridge conditions, construction access, road capacity, upgrades and maintenance arrangements, while highlighting the importance of place-based assessment for smaller communities.

Armidale Regional Council has raised concerns about the adequacy of regional coordination and the need for transparent, enforceable mechanisms for managing the combined impacts of overlapping developments.

These positions reinforce the need for EnergyCo to demonstrate more than a general intention to communicate with stakeholders.

Communication is not mitigation where the physical cause of a foreseeable impact remains unresolved.

Informing residents of increased heavy vehicle traffic does not make an unsafe driveway safe. Advising families of OSOM movements does not create a safe school bus stopping area. Consulting about increased engine braking noise does not itself reduce the acoustic intrusion experienced inside rural residences.

EnergyCo must demonstrate what practical steps will be undertaken, by whom, and when.

The Department is therefore requested to require EnergyCo to:

1. Undertake a location-specific reassessment of traffic and transport impacts on Thunderbolts Way, Salisbury Plains and other affected rural communities, using verified cumulative traffic information.
2. Provide a written, property-specific assessment and determination of the mitigation requests submitted to EnergyCo on 5 September 2026, with appropriate protection of personal information.
3. Identify all necessary driveway improvements, lay-bys, school bus facilities, passing opportunities, road safety measures, noise mitigation, drainage works and agricultural access arrangements.
4. Demonstrate compliance with the relevant requirements and advice of TfNSW and the applicable road authorities.
5. Identify the responsible organisation, funding arrangements, approval pathway, delivery program and maintenance responsibility for each required mitigation measure.
6. Demonstrate how affected landholders' local knowledge and documented concerns have informed the traffic assessment, project design and proposed mitigation.
7. Establish enforceable implementation and monitoring arrangements so that necessary mitigation is completed before the associated traffic impacts occur.

The residents of Salisbury Plains should not be expected to endure foreseeable and preventable impacts merely because those impacts are considered small when averaged across the entire New England REZ transmission network.

The relevant measure of impact must include the actual change experienced by people living, travelling and working beside the affected roads.

The absence of a demonstrated property-specific response to the mitigation measures already submitted raises serious questions regarding the adequacy of EnergyCo's engagement, traffic assessment and proposed community protection measures.

Until these matters are addressed, Section 9.2 should not be accepted as sufficient evidence that the identified construction traffic impacts on affected rural communities have been adequately avoided, minimised or mitigated.

> POSITION SOUGHT

Publish a traceable, property-by-property and community-wide response to the 5 September 2026 Salisbury Plains mitigation requests. For each issue provide the evidence reviewed, inspection/engagement record, decision and reasons, proposed measure, delivery responsibility, funding, timeline and verification, protecting personal details in any public version.

42 | Incomplete Road Upgrade Schedule, Vegetation Clearing and Land Disturbance, Road Deterioration and Unresolved Delivery Responsibilities

Evidence and EIS shortcomings

> References: Technical Report 7, Sections 6.7.7 and 9.3, Tables 9-2 and 9-3, Figures 9-1–9-4 and Chapter 10 (pp. 123–124, 181–182, 185); main EIS Sections 3.3.6, 3.3.8, 3.3.9, 6.4, 7, 13, 18 and 19 and Chapters 14 and 24; amended SEARs dated 7 April 2026, pp. 2–4 (Biodiversity, Water and Soils, Land and Transport); Transport for NSW advice dated 11 February 2026; Uralla Shire Council advice dated 4 February 2026; Salisbury Plains community mitigation document dated 5 September 2026. Further site-specific references: main EIS Section 3.3.8.1 (printed pp. 126–127), Sections 18.3.1–18.3.4 (printed pp. 688–692), Biodiversity mitigation B5 (printed p. 281), Surface Water mitigation SW2 (printed p. 703); amended SEARs Biodiversity and Water and Soils (pp. 2–3), Land and Transport (p. 4). Additional agricultural-fragmentation references: main EIS Section 3.3.8 and Table 3.9 (printed pp. 125–126); Sections 6.4, 12.3.3 (p. 496), 12.4.3 (p. 504), 13.3.1 (p. 530), 13.4.1 (p. 536), 13.5 (p. 539), and mitigation measures AG1–AG4 (pp. 541–543); amended SEARs General Requirements (p. 2), Biodiversity and Water and Soils (pp. 2–3), Land and Transport (p. 4).

Serious concerns arise regarding the adequacy, completeness and implementation certainty of the road upgrade schedule presented in Section 9.3 of Technical Report 7.

Although Tables 9-2 and 9-3 identify numerous proposed intersection and road upgrades, they do not establish a comprehensive delivery schedule specifying the exact timing, responsible organisation, funding arrangements, approval requirements and implementation deadlines for each necessary treatment.

A further concern is the treatment of roads and intersections within the Uralla and Salisbury Plains area. Table 9-2 identifies several intersections along Thunderbolts Way as requiring upgrades, including locations expected to experience high traffic increases over extended construction periods. Table 9-3 also identifies Salisbury Plains Road as requiring localised widening and sealing.

However, the schedule does not provide a clear consolidated account of all works proposed along Thunderbolts Way, including the relationship between intersection upgrades, midblock treatments, OSOM route works, passing opportunities and other infrastructure improvements.

The omission of Thunderbolts Way from the named midblock-upgrade list requires specific explanation, particularly given its role as a construction and OSOM corridor. Any works identified separately in Section 6.7.5 or other approval processes must be reconciled within a single transparent schedule.

Further concern arises from the potentially incomplete cumulative traffic assessment identified earlier in this submission. Five major renewable energy and storage developments appear not to have been individually listed in the cumulative project register.

The formal advice provided by Transport for NSW requires relevant cumulative traffic from projects at EIS and approved stages to be incorporated into turn-warrant assessments.

Where applicable project movements have not been accounted for, EnergyCo must determine whether the additional traffic would change the design requirements, safety standards, road capacity assessments or physical upgrades proposed in Section 9.3.

It is also concerning that the road upgrade schedule does not demonstrate how the property-specific road safety and access mitigation requests submitted to EnergyCo on 5 September 2026 have been evaluated.

These requests included rural driveway improvements, widened access areas, engineered school bus lay-bys, passing opportunities and drainage works affecting properties along Thunderbolts Way and in Salisbury Plains.

The relevant technical assessments must determine whether such measures are required to maintain safe access and whether they should be delivered before construction traffic increases.

A schedule of proposed engineering treatments cannot be treated as a complete mitigation commitment unless the works are sufficiently defined, funded, approved and programmed for delivery before the identified risks arise.

Additional discrepancy — road upgrade extent, clearing footprint and damage to roads and agricultural land

Technical Report 7, Chapter 10 (printed p. 185), states that road upgrades would be undertaken along 31 roads, including Waverley, Barry, Glenburnie, Rouchel and Salisbury Plains roads. Table 9-3 (printed pp. 181–182), however, individually names 29 roads in its midblock upgrade schedule, with treatments including localised widening and sealing of up to 2 metres and full-length sealed widening on Glenburnie Road. The difference requires a transparent reconciliation across midblock, intersection and OSOM route works; it is not, by itself, proof that two roads have been omitted from the total scope of assessed works. For each road EnergyCo must identify the chainages and length of widening, proposed final road width, extra construction working width, areas of cut and fill, culverts, causeways, cattle grids, fencing and driveway changes, and vegetation removal.

The amended SEARs expressly require the biodiversity assessment to address the impacts of transport-route road upgrades, and require consistency of the disturbance footprint across the EIS and technical reports. The main EIS (Section 6.4) estimates a total project disturbance footprint of about 3,579 hectares, comprising approximately 3,144 hectares of full clearing and 435 hectares of partial clearing. Those totals are project-wide and cannot be presented as a road-only clearing figure. Main EIS Sections 3.3.8–3.3.9 also describe approximately 580 kilometres of new and existing project access tracks, with a typical clearing/disturbance width of up to 10 metres and, in constrained locations, up to 20 or 30 metres for batters or passing bays. These track widths must not be applied indiscriminately to public roads, but they demonstrate why the footprint of access construction may be substantially larger than the finished trafficable surface. EnergyCo should demonstrate by road and access segment where each widening, ancillary treatment and track is captured in the mapped disturbance area, the Biodiversity Development Assessment Report, soil and water assessments and agricultural-impact calculations; disclose the affected native vegetation and threatened species habitat; and distinguish permanent clearing from temporary disturbance and rehabilitation.

Technical Report 7, Section 6.7.7 (printed pp. 123–124), already acknowledges that repeated construction heavy-vehicle loading may cause rutting, corrugation, potholes, loss of surface material, pavement fatigue and cumulative structural weakening, especially on lower-standard local and unsealed roads leading to camps, hubs and transmission work fronts. The proposal to undertake pre-construction dilapidation surveys, inspections, maintenance and reinstatement does not eliminate the need for enforceable baseline condition records, pavement-strength and drainage assessments, inspection frequencies, funding guarantees, repair-response standards and independent verification. Works may also affect farmland through clearing, erosion, changed runoff, damaged fences and gates, interrupted livestock access, biosecurity risks and lost or impaired productive land. The Department should require road- and property-specific impact schedules and mitigation that covers both direct construction damage and reasonably foreseeable consequential losses, subject to appropriate evidence and lawful entitlement, rather than relying only on general statements that impacts would be temporary and manageable.

These uncertainties are particularly significant when read with the cumulative heavy-vehicle and OSOM questions in Sections 38 and 38.1 and the road deterioration and geotechnical concerns in Section 33. Any revision to cumulative traffic, heavy-vehicle loading or construction sequencing must trigger a corresponding re-evaluation of road-strengthening needs, disturbance footprints, erosion controls, rehabilitation commitments and the timing of protective work. A route-level traffic capacity finding does not demonstrate

that each affected parcel of agricultural land, roadside ecosystem, driveway or unsealed pavement is adequately protected.

Additional discrepancy — unquantified agricultural fragmentation from 580 kilometres of access tracks

The scale of agricultural land disturbance and potential fragmentation arising from EnergyCo's proposed access-track network raises serious questions about the adequacy of the Environmental Impact Statement and its compliance with the amended SEARs. The main EIS, Section 3.3.8 and Table 3.9 (printed pp. 125–126), identifies approximately 580 kilometres of access tracks, with a formed driving surface generally up to four metres wide but a clearing and disturbance corridor generally up to 10 metres, increasing to 20 metres and, in limited locations, 30 metres for cut-and-fill batters, passing bays and difficult terrain. By way of illustration, a continuous 580-kilometre network at four metres would occupy approximately 232 hectares, increasing to 580 hectares at 10 metres, 1,160 hectares at 20 metres and 1,740 hectares at 30 metres. These are mathematical scenarios, not actual clearing estimates, because the network includes existing tracks, varying widths and non-agricultural land; they must not be added to EnergyCo's assessed disturbance totals. Nevertheless, they demonstrate the substantial scale of potential land disturbance requiring transparent assessment. The main EIS, Sections 6.4, 12.3.3 and 13.3.1, identifies approximately 2,233 hectares of agricultural land affected by construction within a wider 2,580-hectare construction-element disturbance area, while Sections 12.4.3 and 13.4.1 identify approximately 438 hectares of agricultural land within the permanent operational footprint. However, the cited assessments do not separately identify how much of either agricultural figure is attributable to access tracks, how many kilometres cross private farming properties, or how many previously functional paddocks will be divided or become difficult to use. Crucially, EnergyCo itself acknowledges in Section 13.3.1 that construction may necessitate excluding livestock from entire paddocks rather than merely the physical disturbance footprint. Its Land Use Conflict Risk Assessment, Section 13.5, identifies 13 potentially high-risk land-use conflicts before mitigation and retains temporary disruption to grazing and cropping as a high-risk impact even after mitigation. Access tracks may fragment agricultural enterprises; interfere with livestock movement, mustering, farm machinery, watering points and established fencing; introduce biosecurity and drainage risks; and permanently compromise productive use where routes are retained for operational access. These consequences may substantially exceed the hectares physically occupied by a track and cannot responsibly be dismissed by comparing regional agricultural land totals. The Department of Planning must require EnergyCo to provide an independently verifiable, property-by-property GIS assessment identifying existing, upgraded, new, temporary and permanent access tracks; the precise hectares of agricultural land directly disturbed or permanently occupied; additional paddock areas rendered inaccessible or operationally constrained; the relationship to the 2,233-hectare construction and 438-hectare operational agricultural figures; and the cumulative effects of fencing changes, vegetation clearing, drainage works and approximately 130 waterway crossings. This assessment must demonstrate genuine avoidance of unnecessary fragmentation, documented consultation and workable farm-access arrangements, enforceable rehabilitation and maintenance obligations, and appropriate mechanisms for addressing substantiated consequential agricultural losses. Until these matters are demonstrated against the amended SEARs requirements for development-footprint consistency, agricultural land, soils, biodiversity, water and biosecurity impacts, the conclusion that agricultural impacts are minor or manageable at the individual-property level should not be accepted as adequately substantiated.

Further biodiversity verification is required before road and access-track disturbance can be treated as adequately identified. The main EIS, Section 7.1.4 (printed p. 225), states that only approximately 54% of the 10,928-hectare current project area had been subject to biodiversity field survey at the time reported, with inaccessible land addressed through precautionary assessment, expert input and remote sensing. This is not

evidence that the unsurveyed area has no biodiversity value, nor proof that the assessment method is invalid; it requires transparent identification of the road, culvert, lay-by, camp and access-track footprints affected by survey limitations. Main EIS Table 7.1 (printed p. 226) describes a four-metre-wide centreline access track within full-clearing Disturbance Area A, whereas Sections 3.3.8 and Table 3.9 (pp. 125–126) describe wider working disturbance corridors in some terrain. EnergyCo must demonstrate on a GIS and chainage basis how all clearing and construction working widths, not merely formed pavement or nominal four-metre centreline tracks, are captured in the BDAR disturbance accounting. Each affected road segment must also be matched to plant-community type, threatened species and ecological community constraints, habitat connectivity, drainage and waterway impacts, and the property-specific mitigation and rehabilitation proposed. Cross-reference Sections 45–47; the separate BDAR (Technical Report 1) must be supplied as part of the reconciliation, not assumed to be absent or deficient.

Additional discrepancy — approximately 130 waterway crossings, environmental disturbance and farming-property risks

Further serious concerns arise from the main EIS, Section 3.3.8.1 (printed p. 126), which identifies approximately 130 waterway crossings associated with the proposed construction access-track network. These comprise named waterways and smaller drainage lines; some crossings may use existing bridges or causeways, while others may require new or upgraded works, potentially on privately owned agricultural properties. The exhibited EIS passages reviewed do not identify a complete crossing-by-crossing breakdown of private-property and public-road locations, new versus existing crossings, or how many will require culverts, floodable crossings, causeways, bridges, excavation or other engineered structures. Sections 18.3.1–18.3.4 acknowledge risks from clearing riparian vegetation, disturbing creek beds and banks, mobilising sediment and contaminants, changing natural drainage and flow conditions, and creating erosion, flooding and downstream water-quality impacts. The EIS also identifies access-track clearing or disturbance widths generally up to 10 metres and in constrained locations up to 20 or 30 metres; these figures concern access tracks and must not be misrepresented as widths for every waterway crossing or public-road upgrade. Notably, biodiversity measure B5 (printed p. 281) expressly calls for reducing the number of access-track waterway crossings, while surface-water measure SW2 (printed p. 703) requires minimisation of disturbance and site-specific consideration of bed and bank stability, flow, fish passage and scour protection. The amended SEARs require assessment of impacts on biodiversity, watercourses, soils, agricultural land and associated infrastructure. The Department should therefore require EnergyCo to demonstrate, rather than merely assert, why each crossing is necessary; how alternatives and existing access arrangements have been considered; the permanent and temporary disturbance footprint and affected land tenure; and the measures needed to protect downstream landholders from altered runoff, erosion, lost productive land, damaged farm access and ongoing maintenance burdens. The 130 crossings should not be described as 130 entirely new culverts or structures without evidence. This matter should also be cross-referenced to Sections 26 (bridges and culverts), 32 (funding and repair standards), 33 (road and ground condition) and 38 (cumulative impacts).

The Department is therefore requested to require EnergyCo to:

1. Produce a consolidated, geographically referenced schedule of all intersection, road, OSOM, passing-bay, access and associated safety upgrades proposed within the project area.
2. Identify which works form part of the current infrastructure application and which depend on separate approvals or renewable energy developments.
3. Provide revised traffic and intersection assessments where relevant cumulative projects have been omitted from the underlying forecasts.
4. Identify the final or sufficiently developed concept design, relevant technical standards and road authority approval arrangements for each upgrade.

5. Specify the organisation responsible for funding, constructing, inspecting and maintaining each improvement.
6. Provide commencement and completion dates and identify any works that must be operational before construction traffic is permitted to use the relevant route.
7. Undertake a property-specific assessment of the road safety and access mitigation measures identified in the Salisbury Plains community submission of 5 September 2026.
8. Provide a written explanation where identified community safety measures have not been included in the proposed road upgrade schedule.
9. Make the revised plans and schedules available to the relevant councils, road authorities, affected landholders, school bus operators and community for meaningful review.
10. Reconcile the 31 roads identified in Technical Report 7 Chapter 10 with the 29 roads separately named in Table 9-3 and all intersection, OSOM and ancillary-road upgrade schedules, showing each treatment on a location-based plan.
11. Publish a road-by-road schedule identifying widening chainages, permanent and temporary work footprints, earthworks, batters, culverts and drainage, vegetation clearing in hectares (with habitat and offset implications where applicable), affected farm infrastructure and the approval pathway for each work.
12. Cross-reference each public-road upgrade and private access-track segment against the mapped EIS disturbance footprint, the biodiversity assessment and the land, soil, water, agricultural and biosecurity assessments; quantify residual impacts and identify avoidance, minimisation, rehabilitation and offset measures.
13. Establish independent baseline road-condition and pavement-strength surveys, drainage and heavy-vehicle loading assessments, funded maintenance and prompt repair obligations, post-construction reinstatement standards, and a transparent process for substantiated property damage and consequential-loss claims.
14. Identify the road authority and accountable delivery body for each upgrade and require necessary road-strengthening, drainage, access, vegetation and agricultural safeguards to be complete before heavy project traffic uses the affected section, with renewed assessment if cumulative construction traffic changes.
15. Publish a GIS-referenced register for all approximately 130 identified waterway crossings, distinguishing private property from public roads and other land tenure; existing from new or upgraded structures; temporary from permanent works; and proposed culvert, causeway, floodable crossing or bridge treatments. For each crossing provide mapped location, justification and alternatives, construction and operational clearing/disturbance footprint, affected vegetation and agricultural assets, bed/bank stability and flood/scour assessments, fish-passage and water-quality safeguards, landholder consultation, rehabilitation standards, and funded long-term inspection, repair and consequential-damage arrangements.
16. Provide an independently verified GIS overlay for the approximately 580 kilometres of access tracks, identifying the length, land tenure, location and disturbance width of existing, upgraded and entirely new tracks; their classification as temporary or permanent; and the area of agricultural land within their temporary and permanent footprints. Reconcile, without double counting, access-track hectares with the 2,233 hectares of agricultural construction disturbance and 438 hectares of agricultural operational footprint identified in the main EIS. For each affected farming property assess all paddocks divided or requiring temporary exclusion, remaining functional grazing area, stock watering and mustering access, gates and fences, farming machinery access, drainage and erosion, biosecurity, rehabilitation and permanent access arrangements. Provide landholder-reviewed property plans, a practical avoidance and alternatives analysis, independently verifiable mitigation and reinstatement standards, and funded arrangements for substantiated productivity losses and consequential damage before approving or constructing the access routes.

17. For Sargeants Gap Road, reconcile the karst-sensitive road works and construction-load assumptions with Technical Report 7, §§6.7.7 and 9.3, and the main EIS heritage, vibration, groundwater and biodiversity commitments (HH13, NV12, GW5). Require independent geotechnical, geophysical and hydrogeological investigations, a public site-specific Timor Caves Karst Management Plan, meaningful resident and specialist consultation, a binding pre-works and pre-increased-project-traffic hold point, and an independently assessed alternative haulage route if the risk of irreversible karst damage cannot be demonstrated to be acceptably low. See Section 33.1.
18. Publish an independent, location-specific biodiversity and environmental-reconciliation schedule covering every road upgrade, access point, construction lay-by, camp access, waterway crossing and access-track segment. Overlay the full construction working width and any new permanent footprint against the BDAR, main EIS vegetation-clearing categories, 54%-survey coverage map, threatened species and ecological communities, ecological corridors, soils, drainage, agricultural land and cadastral boundaries. Separately distinguish surveyed land from precautionarily modelled land, show which further field surveys are required and by when, and resolve any material design or impact differences through a supplementary assessment and meaningful landholder consultation before determination. Include the separate Technical Report 1 and its survey/offset methodology in this reconciliation, with no double-counting of disturbed hectares.

The residents and farming families of Uralla and Salisbury Plains should not be required to bear the risks associated with increased heavy vehicle and OSOM movements while essential safety improvements remain subject to future assessment, uncertain responsibility or unconfirmed delivery arrangements.

Further evidence and assessment gap. The road-upgrade and environmental disturbance schedule should also reconcile the transport required for construction water supply, on-site reuse, wastewater treatment, waste disposal and biosecurity washdown. The main EIS, §3.3.13.1/Table 3.11 (printed pp. 137–138), identifies approximately 2,400 ML total construction water demand and allows for both piped and tanker delivery; Chapter 23 describes authorised off-site removal of waste and wastewater. These are not additional vehicle quantities that can simply be added to an existing total without checking whether Technical Report 7 has already modelled them. Rather, the absence of a transparent route- and time-based reconciliation creates uncertainty about associated road damage, water sourcing, contaminated-material handling, drainage impacts, dust-suppression feasibility and safe road use. Cross-reference Section 14 for the required movement ledger and Sections 32–33 for road-condition and mitigation commitments.

> POSITION SOUGHT

EnergyCo must publish a definitive, mapped road-by-road upgrade and disturbance schedule, reconcile identified road and crossing works, and secure funded safety, biodiversity, agricultural, drainage, rehabilitation and karst safeguards before construction traffic begins.

Additional requirement by EnergyCo. Integrate the water/waste and biosecurity transport ledger from Section 14 with each road-upgrade and disturbance schedule, showing quantities already counted, any additional two-way truck movements, dust-water demand, approved disposal routes, drainage and contamination controls, and additional funded surface or shoulder protection where the combined loading warrants it.

Provide one definitive road, intersection and access-upgrade schedule reconciling the 31-road total in Chapter 10 against the 29 named Table 9-3 midblock roads, §9.3, Appendix K, separate Port-to-REZ works and projects relied on for Staces Road access. For each location, identify the approved design, chainages, total temporary and permanent disturbance footprint, native vegetation clearing and biodiversity assessment, soil and drainage impacts, agricultural property/access impacts, road-strength and condition baseline, cumulative vehicle loading, mitigation and rehabilitation measures, funding and

maintenance commitments, legal approvals, responsible body, construction sequence and independent acceptance. Require protective works and safeguards before affected heavy vehicles use the route, and publish any outstanding evidence and re-assessment required before final authorisation. Include a separate waterway-crossing register and supporting site-specific environmental assessment for the approximately 130 identified access-track waterway crossings, with accountable maintenance and rehabilitation commitments and documented protection of affected private-property drainage and farm infrastructure. Separately provide the access-track-to-agricultural-footprint reconciliation and property-by-property fragmentation analysis specified in Requirement 16, documenting existing versus new tracks, complete disturbed hectares, temporary paddock exclusions, permanent access and demonstrable farm-operating protections.

43 | Unsupported Conclusion That Construction Traffic Impacts Will Remain Localised, Temporary and Manageable Despite Prior Formal Notification of Community Impacts

Evidence and EIS shortcomings

> References: Technical Report 7, Section 9.3.1 (printed p. 184); Technical Report 7, Chapters 6–9; main EIS Chapters 14 and 24; amended SEARs dated 7 April 2026; Transport for NSW advice dated 11 February 2026; NSW Guide to Transport Impact Assessment 2024; formal Salisbury Plains community mitigation document emailed to EnergyCo on 5 September 2026.

Serious concerns arise regarding EnergyCo's conclusion in Section 9.3.1 of Technical Report 7 that the combined application of its proposed mitigation measures will ensure that construction traffic impacts remain localised, temporary and manageable.

This conclusion requires substantially greater justification when considered against the evidence contained elsewhere in EnergyCo's own Environmental Impact Statement, the requirements of Transport for NSW, the amended SEARs and the formal notification of community impacts submitted to EnergyCo prior to finalisation of the EIS.

On 5 September 2026, EnergyCo executives were formally provided with a detailed Salisbury Plains community mitigation document identifying specific affected properties, foreseeable impacts and proposed mitigation measures. The final EIS was approved internally on 2 October 2026.

EnergyCo therefore had advance notice of substantial concerns regarding heavy vehicle movements, OSOM traffic, rural property access, school bus safety, engine braking noise, residential amenity, road deterioration, drainage, agricultural operations and the cumulative consequences of multiple developments.

Despite this prior notification, Section 9.3.1 does not demonstrate how these property-specific concerns were evaluated or how the proposed measures adequately address the identified risks.

The report's description of impacts as localised and temporary must not be used to diminish the significance of those impacts for the people directly affected.

A localised impact can be substantial, and a construction-related impact extending over several years cannot automatically be regarded as minor simply because it is not permanent.

The EIS itself identifies locations within Uralla Shire where high construction traffic increases are expected over long durations. It also acknowledges potential road safety risks, deterioration of road infrastructure, disruption to access and the need for specific traffic management and safety measures.

These findings require location-specific evaluation and effective mitigation.

The cumulative assessment must adequately incorporate relevant nearby developments. As identified in earlier sections of this submission, five substantial renewable energy and storage developments appear not to have been individually incorporated into the cumulative project register.

Transport for NSW's formal advice requires consideration of cumulative traffic from relevant projects at EIS and approved stages in applicable turn-warrant assessments, as well as detailed consideration of intersection safety, access arrangements and rural agricultural traffic conditions.

Where relevant cumulative traffic has not been incorporated, EnergyCo must explain how it can demonstrate that its mitigation measures remain adequate.

The amended SEARs require the EIS to assess relevant environmental, social and cumulative impacts and describe how issues raised through engagement were considered and influenced the project design.

The existence of a mitigation schedule does not establish that mitigation is adequate unless it can be demonstrated that the measures are appropriate for the impacts identified and will be implemented in time to prevent or minimise those impacts.

The Department is therefore requested to require EnergyCo to:

1. Provide a documented, item-by-item response to the community mitigation document emailed on 5 September 2026, including the assessments undertaken, decisions made and reasons for any rejection or modification of requested mitigation.
2. Explain how the findings from that document were incorporated into the EIS before finalisation on 2 October 2026, including any changes to the design, traffic assessment or mitigation commitments.
3. Demonstrate that the cumulative traffic assessments and proposed road upgrades appropriately account for all relevant renewable energy and storage developments.
4. Provide location-specific assessments of impacts along Thunderbolts Way, within Salisbury Plains and at affected rural property entrances and school bus stopping locations.
5. Demonstrate compliance with the relevant requirements of Transport for NSW, including cumulative turn-warrant assessments, intersection safety, rural agricultural conditions and appropriate access treatments.
6. Identify the measures required to address heavy vehicle noise, property access, road safety, drainage, agricultural operations and the cumulative loss of rural amenity.
7. Establish clear responsibilities, funding arrangements and completion dates for essential mitigation works.
8. Reassess the conclusion in Section 9.3.1 and explain whether the description of impacts as localised, temporary and manageable remains justified after consideration of the outstanding matters.

It is not sufficient for EnergyCo to conclude that impacts are manageable without demonstrating how the identified impacts will actually be managed for the people who experience them.

The residents and farming families of Salisbury Plains provided EnergyCo with detailed notice of foreseeable risks and requested practical mitigation before the EIS was finalised.

The Department should require EnergyCo to demonstrate that this information was substantively considered and that the proposed mitigation addresses the resulting impacts.

Until that evidence is provided, the conclusion in Section 9.3.1 should not be accepted as adequately substantiated for the affected Salisbury Plains community.

> POSITION SOUGHT

Reassess the §9.3/Chapter 10 description of impacts as localised, temporary and manageable against the specific mitigation concerns communicated before EIS finalisation and corrected cumulative traffic information. Publish a response matrix and revised residual-impact findings showing which measures are necessary, funded, approved and actually deliverable.

44 | Consolidated assessment of the reliability of the traffic and transport conclusions

Evidence and EIS shortcomings

Chapter 10 of Technical Report 7 should be read against the detailed evidentiary questions raised in Sections 1–43 and 45–47 of this submission. Those sections identify issues concerning OSOM quantities and route approvals; contradictory intersection treatments and sight-distance deficits; vehicle and workforce traffic assumptions; rural school bus, agricultural and property access; bridge, culvert and road structure capability; cumulative developments and traffic; and the enforceability of proposed mitigation. It is not necessary to repeat each issue here. Their individual source citations and corrective actions form the record against which the overarching conclusion must be tested.

The key concern is whether the report's broad conclusion that transport impacts would remain localised, temporary and manageable is supported for the actual roads, farms, school bus stops and households carrying the greatest burden. A road network may retain spare traffic-flow capacity while specific intersections, bridges, rural property entrances or communities experience unacceptable or unmitigated safety and access risks. Where the figures or assessments identified earlier are materially corrected, the corresponding Chapter 10 impact ratings and conclusions must also be reassessed.

A revised assessment must also demonstrate how EnergyCo substantively considered the Salisbury Plains community mitigation material submitted on 5 September 2026 and the technical, agricultural, noise and social-impact evidence. The submission does not assert that every additional project is certain to be built or will use every route; it requires transparent screening, reasonable sensitivity testing and reasoned explanations for exclusions. Equally, a reference to a later permit or management plan is not itself evidence that necessary road works, technical assessments or funding are secured.

The Department should require a corrected Chapter 10 conclusion supported by a traceable evidence and mitigation register linked to the section-by-section actions in this document. Material revisions should be subject to meaningful input from TfNSW, councils, affected bus operators and landholders before the Department relies on them to determine project impacts.

> POSITION SOUGHT

Revise the Chapter 10 transport conclusion only after documenting the disposition of all outstanding findings and agency/community concerns in Sections 1–43 and 45–47. Publish a traceable source-to-conclusion reconciliation, revised residual impact ratings where warranted, and the secured mitigation and approval requirements necessary for the Department to rely upon those conclusions.

45 | Failure to distinguish permanent and temporary road and intersection disturbance — private property impacts and Inglewood Road

Evidence and EIS shortcomings

> References: Technical Report 7, Sections 6.7.2 and 9.3, Tables 9-2 and 9-3, Appendices G, H and K (particularly drawings IS_MSC_06 and IS_MSC_08); main EIS Sections 3.2, 3.3.5, 3.3.6 and 6.4; amended SEARs (7 April 2026), pp. 1–2, 4 and 6; Transport for NSW amended advice (11 February 2026), Attachment A, pp. 3–6. Sections 19, 26, 34.1, 35 and 42 of this submission are also relevant. Appendix K drawings IS_USC_05 (New England Highway/Glenburnie Road; PDF p. 389) and IS_WAC_07 (Oxley Highway/Ruby Hills Road; PDF p. 344) are additional specific examples; see Section 46 on acquisition.

It is a serious deficiency in the exhibited transport assessment that EnergyCo proposes intersection treatments at approximately 57 locations and road upgrades affecting 31 public roads, yet numerous Appendix H drawings identify land only as “Disturbance Footprint” or “Land Impacted (Indicative)” without clearly disclosing whether the mapped works involve temporary construction occupation, permanent pavement or intersection widening, permanently altered drainage or access, vegetation removal, modification of the public road reserve, acquisition or occupation of private land, or land that must be reinstated. The main EIS distinguishes an approximately 3,579-hectare project-wide construction disturbance footprint from an approximately 471-hectare permanent operational footprint; those regional figures are not a property-specific reconciliation and do not allow individual residents to determine the ultimate status of land adjoining public-road works. Importantly, the EIS biodiversity classifications “Disturbance Area A” and “Disturbance Area B” describe the degree of vegetation clearing, NOT whether impacts are permanent or temporary. Inglewood Road illustrates the real and foreseeable consequences of this ambiguity: Technical Report 7 proposes full-length sealed widening by up to two metres to support construction traffic associated with workforce Camp 1; Appendix H drawings IS_MSC_06 (Inglewood Road/Beggary Creek Road) and IS_MSC_08 (Muscle Creek Road/Inglewood Road) show indicative disturbance in close proximity to an existing residence, driveway and associated property infrastructure, without supplying surveyed dwelling setbacks, precise cadastral boundaries, land tenure requirements, final road formation, proposed vegetation and fence removal, post-construction treatment or enforceable restoration arrangements. EnergyCo has also identified a potential alternative Camp 1 location, yet has not transparently demonstrated whether the associated Inglewood Road widening would remain necessary if that alternative is selected. This is NOT an isolated concern: across the full haulage and construction network, every householder, farmer and road user adjacent to proposed junction widening, turn lanes, access roads, lay-bys, culverts, drainage alterations and vegetation clearing must be able to understand exactly what is to be changed, for how long, whether it is to remain, and how access, safety, privacy, amenity and agricultural operations will be protected. The amended SEARs require a transparent project footprint and physical layout over time, road-upgrade concept designs, assessment of land and transport impacts,

measures addressing uncertainty and meaningful engagement with affected landowners; TfNSW specifically sought concept-level designs accounting for existing property accesses, safe sight distance, swept paths, drainage and geometric constraints. A label of "indicative disturbance" is not a substitute for an accountable, property-specific impact assessment. Material impacts must be identified, assessed and disclosed before determination, not discovered by residents after the project has been approved.

The problem is demonstrable in the strategic drawings themselves, and extends beyond the Inglewood Road residence. Technical Report 7 Appendix K, drawing IS_USC_05 for the New England Highway/Glenburnie Road intersection (PDF p. 389), marks an indicative disturbance footprint of approximately 33,900 m^2, approximately 6,500 m^2 and 4,100 m^2 of property acquisition required, and approximately 1,000 m^2 of vegetation/trees to be removed, alongside proposed changes to cattle grids, fences, gates and utilities. Appendix K drawing IS_WAC_07 for the Oxley Highway/Ruby Hills Road intersection (PDF p. 344) separately marks approximately 1,915 m^2 of property acquisition and works close to an existing memorial, with associated roadside infrastructure changes. These are proposed design quantities, not confirmed surveyed acquisitions or proof of ecological impact severity; they cannot automatically be added to the main EIS land-acquisition tables. However, their presence demonstrates that at least some drawing packages identify land-take while other Appendix H drawings use only the broader labels "Disturbance Footprint" and "Land Impacted (Indicative)". EnergyCo must provide a reconciled, drawing-by-drawing statement of which disturbance is temporary, permanently retained as pavement or drainage, acquired in fee simple, held by easement or licence, or restored, and which local residents, farm access routes and ecological values are affected. Section 46 addresses the associated acquisition and title issues without repeating this road-design criticism.

> REQUIRED ACTION BY ENERGYCO — SECTION 45

EnergyCo must distinguish permanent from temporary disturbance for EVERY road and intersection, disclose dwelling- and property-specific consequences including Inglewood Road, and provide affected landholders the plans and a meaningful opportunity to respond before determination. Reconcile Appendix H and K plans with the specific land-take and vegetation quantities annotated on IS_USC_05 and IS_WAC_07 and with the parcel acquisition register in Section 46.

Before determination, provide a complete GIS-referenced register and dimensioned, cadastral-overlay concept drawings for EVERY proposed road and intersection disturbance area, identifying (a) the exact road and intersection treatment and whether it is temporary or permanent; (b) existing road reserve boundaries, proposed works and any land access, licence or acquisition requirement; (c) surveyed distances to dwellings, driveways, buildings, fences and significant trees; (d) expected construction duration, vegetation clearing, drainage and noise/dust/vibration consequences; (e) the precise land and infrastructure to be restored, retained or maintained and who bears responsibility and cost; and (f) viable options to avoid or reduce impacts. Provide a specific property-impact and alternatives assessment for Inglewood Road and IS_MSC_06/IS_MSC_08, including the implications of the alternative Camp 1 site. Give directly affected landowners and relevant road authorities the draft drawings and a meaningful opportunity to comment BEFORE the affected works are accepted as resolved; respond individually and in writing to objections and identify amendments. If necessary details are not available, publish the resulting uncertainty and provide a supplementary assessment and consultation process before determination. Final designs, property agreements and rehabilitation obligations must be secured before any works commence. Cross-reference Sections 19 (intersection compliance), 26 (bridges and culverts), 33.1 (road safety and pre-approval consultation), 34 (rural property access), 41 (road disturbance and vegetation clearing) and 43 (conclusions).

46 | Unreconciled road-corridor property acquisition, temporary facility land take and compensation consequences

Evidence and EIS shortcomings

> References: Main EIS §§3.2.9.1–3.2.9.2 and Tables 3.4–3.5 (printed pp. 102–103), §§3.3.5 and 6.4 (pp. 110–112 and 212–213); Technical Report 7 Appendix K, IS_USC_05 (New England Highway/Glenburnie Road, PDF p. 389) and IS_WAC_07 (Oxley Highway/Ruby Hills Road, PDF p. 344), plus Appendix H; amended SEARs (7 April 2026), pp. 1–2, 4 and 6; TfNSW amended advice (11 February 2026), Attachment A, pp. 3–6; cross-reference Sections 35, 42 and 45.

There is a material gap between indicative road-upgrade disturbance drawings, the project-wide land-acquisition schedule and the information necessary to establish what individual landholders could permanently lose. Technical Report 7 Appendix K, drawing IS_USC_05, labels a roughly 33,900 m^2 disturbance footprint at the New England Highway/Glenburnie Road junction and separately indicates about 6,500 m^2 plus 4,100 m^2 of property acquisition, together with 1,000 m^2 of vegetation/tree removal and changes to existing gates, cattle grids, fences and utilities. Drawing IS_WAC_07, Oxley Highway/Ruby Hills Road, identifies about 1,915 m^2 of property acquisition and changes affecting roadside infrastructure and the vicinity of a memorial. These indicative drawing quantities are not confirmed titles, surveyed areas or completed acquisitions, but they raise straightforward questions that must be answered: which lots are involved; is each impact within the current road reserve or private land; what land is required permanently versus temporarily; and how will access, fencing, drainage, biosecurity, amenity and compensation be resolved? Sections 19 and 45 identify design and footprint problems; this section addresses the legal and agricultural consequences of the land requirement.

The main EIS itself confirms that land acquisition cannot be inferred from the disturbed surface area. Section 3.2.9.1 describes temporary construction easements and permanent transmission and operational access easements. Table 3.4 identifies approximately 1,199 ha proposed for acquisitions associated with permanent facilities, while Table 3.5 separately identifies approximately 1,455 ha of additional freehold acquisitions: Camp 1 (300 ha), Camp 2 (780 ha), an ancillary/laydown site on Timor Crawney Road (165 ha), and an ancillary/laydown site near Albano Road (210 ha). Individual Table 3.5 entries are marked “Full”, although the table footnote qualifies that multiple owners are involved and some interests are full and others partial; that qualification must be explained parcel by parcel. The workforce camps are described in §3.3.5 as temporary facilities to be removed following construction. A temporary use may still require purchase, but the justification for full freehold acquisition of large areas, future ownership, proposed disposal or reuse, and treatment of residual agricultural land should be examined against reasonably available lesser-impact tenure arrangements and alternative locations. The 1,199 ha and 1,455 ha tables describe different acquisition categories; neither should be assumed identical to the 3,579-ha construction footprint, and the Appendix K road acquisition quantities must not be added to them without proof of their treatment in the main schedule.

Without a consolidated, parcel-specific register, it is not possible for a landholder to check whether the published drawings reflect proposed negotiations or compulsory acquisition, whether roadworks cause loss of safe access or productive land outside the nominal acquired strip, or whether rehabilitation and restoration duties survive construction. This is particularly significant in light of the amended SEARs requirements for a coherent development footprint and physical layout over time, assessment of land, agriculture, transport and cumulative impacts, and evidence of consultation with affected landowners. EnergyCo should not rely on generic future acquisition negotiations as a substitute for disclosing foreseeable property impacts relevant to determining the project. Any final tenure arrangement remains subject to applicable law and individual rights; this submission asks for transparent and properly assessed proposals, not an unsupported legal declaration that acquisition is unlawful.

> REQUIRED ACTION BY ENERGYCO — SECTION 46

Before determination, publish a GIS-linked and cadastral parcel-by-parcel schedule of every property affected by permanent road widening, intersection works, construction access, operating access, camps or laydown facilities, including the affected lots, indicative areas, proposed interest (freehold acquisition, permanent easement, temporary construction easement, licence or existing road reserve), current and future use, whether works remain after construction, and rights of access and reinstatement. Reconcile each Appendix H/K map—including IS_USC_05 and IS_WAC_07—with main EIS Tables 3.4–3.5 and the construction/operational footprints without double counting. Identify acquisition responsibility, legal pathway, timing, proposed agreement/compensation processes, actual farming and residential consequences, alternatives to acquisition and future land ownership or disposal for temporary facilities. Supply directly affected landholders with dimensioned property plans and individual consultation records; independently review any material unresolved impacts and submit a supplementary EIS assessment and meaningful further engagement where necessary before project determination.

47 | Unresolved environmental and property impacts of pre-construction and enabling works before main management plans are approved

Evidence and EIS shortcomings

> References: Main EIS §§3.3.1 and 3.3.4 (printed pp. 104 and 108–110), §§3.3.5, 6.4 and 7.1.4–7.1.5 (pp. 110–112, 212–213, 225–226); Technical Report 7 §§6.7.1–6.7.2 and Table 4-2 (printed pp. 102–104 and 29); amended SEARs (7 April 2026), pp. 1–2, 3–4 and 6; TfNSW amended advice (11 February 2026), Attachment A, pp. 3–6; cross-reference Sections 34.1, 42, 45 and 46.

A further determination-stage concern arises from the main EIS, §3.3.1 (printed p. 104), which expressly proposes that certain pre-construction minor work and enabling work may commence following project determination but before approval of the construction management plans otherwise required by the project approval. The EIS indicates that mitigation controls would still apply; this is not a claim that EnergyCo proposes uncontrolled or automatically unlawful activities. Nevertheless, §3.3.4 (printed pp. 108–110) defines pre-construction minor work to include adjustments to property boundaries, gates, driveways, fences, stock infrastructure and utilities, maintenance of access tracks and some vegetation trimming or removal. Enabling work may extend to establishing workforce camps and construction ancillary areas, forming or upgrading access tracks, localised road widening, pavement strengthening, drainage and culvert adjustments. The EIS describes thresholds intended to avoid impacts requiring biodiversity offsets or specialist plans and proposes an Enabling Works Management Plan, but site locations, detailed classifications, review pathways and landholder-specific consequences are not consolidated in one publicly testable schedule.

The enabling-works traffic assumption also requires closer scrutiny. Technical Report 7, §6.5.1 (printed p. 91), identifies up to 200 workers, approximately 200 daily worker trips and 21 simultaneously active road-upgrade locations, before concluding that the resulting traffic can be accommodated on existing rural roads before upgrades are undertaken. This statement relies heavily on averaging journeys across geographically dispersed sites and does not demonstrate each affected road's capacity to accommodate heavy plant, materials deliveries, temporary traffic control or school and agricultural traffic at particular bottlenecks and seasonal conditions. EnergyCo should identify every pre-upgrade movement type, axle load, route and access point, explain the assumed distribution rather than rely solely on ten average movements per site, and undertake site-specific pavement, bridge, shoulder, flood, school and property-access screening before enabling activities begin. The requirement is not to bitumen-seal every rural road indiscriminately, but to

provide the necessary funded strengthening, drainage, safe passing or sealing where justified by verified engineering and community risk, before the corresponding loading and disruption occurs.

This deferral matters when read with the main EIS biodiversity assessment. Section 7.1.4 (printed p. 225) reports surveys over about 54% of the current project area, with precautionary methods for inaccessible land, and Table 7.1 (p. 226) includes a nominal four-metre centreline track in the full-clearing biodiversity footprint although wider access-track construction corridors are allowed elsewhere in the EIS. These facts do not show that every early-work location is unsurveyed or that the biodiversity methodology is necessarily deficient; rather, they make it essential to demonstrate where each early activity is proposed, what land has been surveyed, what vegetation and fauna habitats could be affected, the true working width and property access changes, and whether the work can in fact meet the stated "minor" or "low-impact" criteria. Independent checks are particularly important for watercourse crossing works, erosion-prone soils, karst-sensitive areas, significant trees, native vegetation, school bus corridors and land adjoining homes and farms. Transport for NSW advice also calls for distinct pre-construction traffic, sight-distance, swept-path and access assessments, and restricts the use of temporary traffic controls in specified pre-upgrade access scenarios. A broad statement that matters will be finalised later cannot replace evidence that the early activity is within its assessed scope and appropriately controlled.

The EIS also describes separate exempt investigation activities, subject to qualifying statutory conditions, that are excluded from this EIS and said to be managed through EnergyCo's own environmental review process (§3.3.1.1, printed pp. 104–105). Those separate activities should not be conflated with approved pre-construction and enabling works or treated as proof that all work is authorised by this infrastructure approval. The Department must be able to identify which early works depend on this approval, which are independently authorised, what assessment and notification applies, and which irreversible environmental or property outcomes are prohibited until the requisite investigations and approvals are complete. Given the short interval anticipated between approval and commencement, critical design, survey and landholder consultation information should be exhibited before determination where material to the decision, with clear pre-work hold points for remaining detail.

> REQUIRED ACTION BY ENERGYCO — SECTION 47

Before determination, provide a GIS-referenced early-works and enabling-works register with every proposed location, work description, legal approval pathway, responsible authority, extent and duration of ground disturbance, vegetation clearing and habitat survey status, drainage and watercourse impacts, existing and modified property access, land tenure, heavy-vehicle route and traffic controls, affected residents and required consultation. Publish objective criteria, supporting surveys and an independently verified decision process for classifying work as "minor" or "low impact"; identify which construction environmental and specialist management requirements apply from the outset and which must be satisfied before any particular works begin. Require enforceable no-go conditions and independent pre-work hold points where biodiversity, cultural heritage, karst, drainage, road safety or property interests could be materially affected, and complete necessary road safety and property-access measures before project-related vehicle movements begin. Distinguish exempt investigations managed under another statutory pathway from work authorised under this proposal, and provide a public change-control and complaints register. Any material unresolved locations or new disturbance must be assessed and opened to meaningful affected-landholder consultation before determination or before authorisation of that work, as appropriate. Reconcile Technical Report 7 §6.5.1 (printed p. 91) and its 200-worker/21-site assumption against actual early-phase heavy-plant movements, physical road capacity and local safety constraints, and apply enforceable no-haulage hold points until essential pre-upgrade protections are completed.

Conclusion

I ask the Department not to accept broad statements that traffic impacts are "manageable" without sufficient underlying evidence for the roads and residents most exposed to them. The risk is not evenly spread across a 305-kilometre project. It is concentrated at particular intersections, farm accesses, rural school bus routes and constrained road sections, including Thunderbolts Way and the connections serving Salisbury Plains and roads from Bayswater to Gundy.

The amended SEARs call for assessment of road condition, road safety, capacity, access, cumulative impacts, required upgrades and mitigation. Before determining SSI-74175972, the Department should require EnergyCo to demonstrate — with location-specific engineering evidence and accountable delivery arrangements — that foreseeable safety and property-access impacts will be prevented or reduced before construction traffic increases, not merely monitored after the fact. The Department should also require the parcel-specific land-take evidence and enabling-works safeguards identified in Sections 46–47 to be resolved to a level adequate for determination.

Please acknowledge this submission, place it on the public assessment record, and address the matters raised in the Department's assessment and requests for additional information.

Document references

NSW Department of Planning, Housing and Infrastructure, Amended Planning Secretary's Environmental Assessment Requirements, SSI-74175972, 7 April 2026, pp. 1–2, 4 and 6.

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Environmental Impact Statement, October 2026, §§3.3.5–3.3.6 and 14.3; Tables 3.6–3.7, pp. 110–115 and 559–562.

Aurecon for EnergyCo, Technical Report 7: Traffic and Transport Impact Assessment, Revision 0, 28 September 2026, especially §§2.3, 6.2.6, 6.3, 6.5, 6.4.2, 6.5.2–6.5.3, 6.5.7, 6.6.1, 6.6.3, 6.7, 8.4–8.10 and 9.1; Tables 6-3, 6-9, 6-11–6-12, 6-15–6-17, 8-5, 8-7, 9-1–9-3; Appendices F, G and J. In particular, §6.4 and Figures 6-4–6-6 (pp. 77–80), §6.7.4 (pp. 112–113), Appendix G (pp. 261–262) and Tables 9-2 and 9-3 (pp. 177, 181).

Site-specific road safety discrepancy (Section 34): Aurecon Technical Report 7 §§6.7.8–6.7.9 (printed pp. 124–127), Table 9-2 (printed p. 177), Appendix G (printed pp. 261–263) and Appendix K; main EIS §14.3.6 (p. 565) and TT17–TT23 (pp. 574–575); TfNSW amended advice of 11 February 2026, Attachments A and B; original 5 September 2026 Salisbury Plains community mitigation submission.

EnergyCo, Environmental Impact Statement, Chapter 16 (Noise and Vibration), §§16.1.1, 16.3.6 and 16.6; printed pp. 587–588, 612–613 and 625–628; and Chapter 13, mitigation measure AG3, printed pp. 541–542.

Transport for NSW, Amended SEARs advice (REN25/00205/001), 11 February 2026, Attachment A, pp. 2–8 (especially p. 2, non-high-risk OSOM and Special Purpose Vehicle descriptions), and Attachment B, pp. 9–10.

Uralla Shire Council, Uralla Local Transport Forum confirmed minutes, 5 August 2025, p. 4 (Rowan Avenue: recommended 15-tonne Gross Vehicle Mass restriction between Bridge Street and Duke Street). Status and installation of the restriction to be confirmed in writing with Council.

Uralla Shire Council, advice on Revised Scoping Report, SSI-74175972, 4 February 2026, pp. 1–2.

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Technical Report 6: Agriculture Impact Assessment, September 2026, especially §§5.4–5.6 (restricted agricultural movement, cropping, harvesting and livestock impacts).

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Technical Report 4: Social Impact Assessment, September 2026, especially §§5.2.7.1–5.2.7.2 (noise, rural road traffic, safety and community disruption).

Aurecon for EnergyCo, Technical Report 7, Section 5.5.2 (printed p. 64; PDF p. 80), Appendix J, Table J-7 (PDF p. 374), identifying thirteen Uralla Shire school services listed under Edwards Coaches, including S331 (Thunderbolts Way) and S334 (Salisbury Road). Main EIS, Section 14.2.6 (printed p. 558), Section 14.3.7 (printed pp. 565–566), and mitigation measures TT17, TT18 and TT23 (printed pp. 574–575).

Aurecon for EnergyCo, Technical Report 7, Figures 6-17–6-19 (printed pp. 106–107); §§4.5.3–4.5.4 and 6.7.3 (printed pp. 33–34 and 105–109); Appendix A, Tables A-3–A-4 (printed pp. 189–190); Appendix B, Table B-1 (printed pp. 192–196); and Appendix F, Table F-2 (printed pp. 221–226). Compare amended SEARs, Transport (p. 4).

5 September 2026: Property-Specific Mitigation Measures — Thunderbolts Way, Salisbury Plains and Surrounding Affected Residents (copy of document supplied by affected residents; Exhibit A to separate Figure 6-17 discrepancy notice); 17 October 2026, EnergyCo_Thunderbolts_Way_EIS_Mitigation_Revised_Original_Email_17_Oct_2026.docx (cross-reference and correspondence timeline).

Whole-route intersection design discrepancies: Aurecon Technical Report 7, Table 9-2 (printed pp. 176–180), Appendix G (printed pp. 251–272), plus Appendices H and K; TfNSW advice REN25/00205/001 (11 February 2026), Attachment A, pp. 2–6; amended SEARs, Transport, p. 4. See full comparison table in Section 19.

Major ancillary, accommodation camp and energy hub access: Technical Report 7, Section 6.7.4, Table 6-19 (printed pp. 110–111), Section 6.7.2 (pp. 103–104), Table 6-16 (p. 96), Appendix G; EIS Tables 3.3, 3.6 and 14.3 (pp. 93, 114 and 562–563), Sections 3.3.5 and 6.10; amended SEARs p. 4; TfNSW amended advice of 11 February 2026, Attachment A, pp. 2–6.

Intersection mitigation categorisation and temporary controls: Aurecon Technical Report 7, §2.4 and Tables 2-2–2-3 (pp. 15–16), §6.7.2 (pp. 103–104), §6.7.4 (pp. 109–113), Appendix G; main EIS §14.3.2 (p. 561), TT17–TT19 and TT23 (pp. 574–575); amended SEARs Transport p. 4; TfNSW advice of 11 February 2026, Attachment A pp. 2–6. See Section 21 and its comparison table.

No-upgrade Uralla town-centre intersection findings: Aurecon Technical Report 7, §§6.6.1 and 6.7.4 (printed pp. 97 and 112–114), §8.7 (printed p. 159) and Appendix A (IS_USC_01/IS_USC_15); main EIS §§14.3.2, 14.3.6 and 14.6 (pp. 561, 565, 570–575); amended SEARs Transport p. 4; TfNSW advice of 11 February 2026, Attachment A pp. 2–6. See new Section 22.

OSOM road suitability on non-approved haulage routes: Aurecon Technical Report 7, §§6.4.2 and 6.7.5, Tables 6-9 and 6-21 and Figures 6-12/6-21 (printed pp. 81–89 and 114–120); main EIS §14.3.3 and TT5–TT8; amended SEARs, Transport (p. 4); TfNSW amended advice of 11 February 2026, Attachment B (pp. 9–10). See Section 23.

OSOM convoy passing opportunities, rural driveway access and agricultural stock movements: Technical Report 7, §6.7.5, Figure 6-23 and Table 6-22 (printed pp. 119–121); amended SEARs, Transport (p. 4); TfNSW amended advice of 11 February 2026, Attachment B (pp. 9–10); main EIS mitigation TT5, TT16–TT17, TT19 and TT23; community mitigation request of 5 September 2026. See Section 24.

OSOM page 120 summary, vehicle mass reconciliation and speed/timing assumptions: Technical Report 7, §6.5.7, Table 6-15 (printed p. 95), §6.7.5 Summary and Table 6-22 (printed pp. 119–120), Figure 6-23 (printed p. 121); main EIS §§3.3.6 and 14.3.3, Table 3.8 and TT5–TT8 and TT16–TT19; amended SEARs p. 4, Transport; TfNSW advice of 11 February 2026, Attachment B pp. 9–10; community mitigation submission, 5 September 2026.

Bridge, culvert and watercourse crossing structural suitability: Technical Report 7, §§4.5.7–4.5.8, 6.4.2 and 6.7.5 (including printed pp. 39, 87–88, 114–120), Tables 6-9, 6-21 and 6-22 and Appendices J/K (including

indicative Ruby Hills Road bridge-limit signage and drainage/culvert design drawings); main EIS §§3.3.6 and 14.3.3 and TT5–TT8; amended SEARs Transport p. 4; TfNSW amended advice of 11 February 2026, Attachment B pp. 9–10. See new Section 26.

Thunderbolts Way-specific road-condition and maintenance assessment: Technical Report 7, §§5.1.2, 6.7.7, 8.5.1, 9.1.5 and Table 9-3 (printed pp. 49, 123–124, 151, 167, 181–182); main EIS §14.3.5 (printed p. 564), mitigation TT7 (printed p. 572); amended SEARs, Transport (p. 4); Uralla Shire Council advice of 4 February 2026 (p. 2). See Section 31.

Southern construction-network road condition, structural capacity and maintenance: Technical Report 7, §6.7.7 (printed pp. 123–124), §§8.5.1–8.5.3 (printed pp. 151–154), §9.1.5 (printed p. 167) and Table 9-3 (printed pp. 181–182); main EIS §14.3.5 (printed p. 564) and Table 5.13 (printed p. 201); amended SEARs, Transport (p. 4).

Rural property access, agricultural continuity and documented landholder engagement (Section 35): Technical Report 7 §§6.7.4 and 6.7.13 (printed pp. 110 and 128–129); main EIS Table 14.4 (p. 566), LP2 (pp. 507–508), AG3 (pp. 541–543) and SO2 (pp. 408–409); amended SEARs Transport and Engagement (pp. 4 and 6); original 5 September 2026 mitigation request; 17 October 2026 formal mitigation review.

Emergency service access, rural evacuation and emergency response-time discrepancy (Section 36): Technical Report 7 §6.7.14 (printed p. 129); main EIS Table 14.4 (p. 566), TT1 (p. 570), TT16/TT21 (pp. 574–575), §17.3.4.3 (p. 664) and §24.2.2.12 (p. 803); Technical Report 4 §§5.2.7.2 and 5.2.8.2 (pp. 136–137, 144) and Appendix F (p. 47); amended SEARs pp. 4–5; TfNSW amended advice 11 February 2026, Attachment A pp. 3–4.

Operational traffic, lifetime road maintenance and rural-property access discrepancy (Section 37): Technical Report 7 §§7.1–7.8 (printed pp. 130–132), §9.1.5 (printed p. 167), Table 9-2 (printed p. 175), Appendix G (printed p. 257); main EIS §§3.4–3.5 (printed pp. 141–143), §14.4 (printed pp. 567–569) and Table 14.6; amended SEARs, Transport and Hazards (pp. 4–5); TfNSW amended advice dated 11 February 2026, Attachment A (pp. 2–6).

Cumulative Uralla–Salisbury Plains traffic impacts and five unlisted foreseeable projects (Section 38): Aurecon Technical Report 7, Chapter 8, §8.1, Table 8-1 (printed pp. 134–140), §8.3 and Table 8-2 (printed pp. 147–148), §§8.4–8.5.1 (printed pp. 148–152); main EIS Chapters 14 and 24; amended SEARs Transport (p. 4); TfNSW amended advice dated 11 February 2026 (Attachment A, pp. 2–4); NSW Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026), §3.4 (pp. 16–17); Uralla Shire Council Parliamentary Inquiry submission received 6 February 2025; NSW planning records for Deeargee Solar SSD-70753725, Hillview Solar SSD-72447960, Hillview Wind SSD-78329994, Eastern Hub Firming Battery SSD-71860708 and Balala Wind SSD-143456490.

Cumulative OSOM trip generation, five unlisted future developments and apparent Kyoto arithmetic discrepancy (Section 38.1): Technical Report 7 §8.4, Tables 8-3–8-7 (printed pp. 148–151), §8.5.1 (p. 151); amended SEARs Transport (p. 4); Transport for NSW amended advice of 11 February 2026; NSW Planning Portal SSD-143456490, SSD-78329994, SSD-72447960, SSD-71860708 and SSD-70753725. The 1,495 figure is illustrative and conditional on both wind farms proceeding at proposed maximum turbine numbers.

Access tracks, agricultural disturbance and functional farm fragmentation (Section 42): main EIS §3.3.8 and Table 3.9 (pp. 125–126); §§6.4, 12.3.3, 12.4.3, 13.3.1, 13.4.1 and 13.5 (pp. 212–213, 496, 504, 530, 536, 539), agricultural measures AG1–AG4 (pp. 541–543); amended SEARs (7 April 2026), General Requirements (p. 2), Biodiversity/Water and Soils (pp. 2–3), Land/Transport (p. 4). Calculated corridor-area scenarios are illustrative, not EIS clearing estimates.

Additional environmental disturbance and field-survey reconciliation (Section 42): main EIS §§3.3.8, 6.4 and 7.1.4–7.1.5, Table 7.1 (printed pp. 125–126, 212–213 and 225–226); relevant BDAR / Technical Report 1 cross-

check to be provided; amended SEARs Biodiversity, Water and Soils and Transport (pp. 2–4). The 54% figure is survey coverage of the current project area, not a quantified area of unsurveyed roadworks.

Specific road-upgrade land-take, infrastructure and vegetation drawings (Sections 45–46): Technical Report 7 Appendix K IS_USC_05, New England Highway/Glenburnie Road (PDF p. 389; indicative 33,900 m^2 disturbance, 6,500 m^2 and 4,100 m^2 property acquisition, 1,000 m^2 tree/vegetation removal), and IS_WAC_07, Oxley Highway/Ruby Hills Road (PDF p. 344; indicative 1,915 m^2 property acquisition). Figures are annotated proposal quantities requiring surveyed confirmation, not completed acquisitions.

Freehold and easement acquisition and temporary construction facilities (Section 46): main EIS §3.2.9.1–3.2.9.2, Tables 3.4–3.5 (printed pp. 102–103), and §3.3.5 (pp. 110–112); amended SEARs General, Land, Transport and Engagement (pp. 1–2, 4 and 6); TfNSW amended advice 11 February 2026, Attachment A pp. 3–6. Distinguish permanent-asset acquisitions (1,199 ha), additional acquisitions (1,455 ha) and road-specific drawings to avoid double-counting.

Pre-construction / enabling work before main plan approval (Section 47): main EIS §§3.3.1–3.3.1.1, 3.3.4–3.3.5 (pp. 104–105 and 108–112), §7.1.4–7.1.5 (pp. 225–226); Technical Report 7 §6.7.1–6.7.2 (pp. 102–104), Table 4-2 (p. 29); TfNSW amended advice Attachment A (pp. 3–6). Separate statutory exempt investigations and pre-construction minor / enabling work are not interchangeable categories.

Additional Tamworth corridor, Moonbi–Bendemeer and rural school/seasonal road-use evidence (Sections 3, 5–7, 17, 23 and 33): Technical Report 7 §§4.5.3, 6.4.2, 6.7.3, 6.7.5, 6.7.12–6.7.13, 8.5.2; Tables 6-7 and 6-8 (printed pp. 85–87), Appendix K transformer VTP sketches RS_TRC_21, RS_TRC_23 and RS_TRC_25; EnergyCo Tamworth Port-to-REZ OSOM Route Development Report (September 2026), and EnergyCo's Port-to-REZ Tamworth consultation closing 28 October 2026; Community transport observations, 1 November 2026 (community evidence requiring site verification).

Additional camp, spoil, water and wastewater traffic sources (Sections 9, 10, 12, 14 and 42): Technical Report 7 §§6.5.3–6.5.6 and Tables 6-12–6-17 (printed pp. 92–96); main EIS §§3.3.3.2, 3.3.5, 3.3.13.1/Table 3.11 (printed pp. 107, 110–112, 137–138), Chapter 23 construction waste and wastewater measures (including relevant table); Technical Report 7 §§6.7.3 and 8.5.2 (printed pp. 105–109 and 153–154). Water demand is not equivalent to a wholly trucked volume.

Additional cumulative-project screening (Section 38): Wala Wala (Dungowan Valley) Pumped Hydro, NSW Major Projects Portal, SSD-138320740 (Prepare EIS), https://www.planningportal.nsw.gov.au/major-projects/projects/wala-wala-dungowan-valley-pumped-hydro; Australian Government EPBC public referral 2026/10620 (potential early-2029 construction and indicative connection/road arrangements), https://epbcpublicportal.environment.gov.au/all-referrals/project-referral-summary/?id=5ae3f214-509c-f111-b8dc-6045bdc4aff7. Indicative dates/roads remain subject to approval and detailed design.

Port Stephens Cutting project status and route-disruption screening (Section 38): Tamworth Regional Council, Port Stephens Cutting Upgrade, Council 2024–25 Delivery/Annual Plan (approximately five kilometres of Nowendoc Road and 12–18 month then-anticipated works) and draft 2026–27 Operational Plan and Budget (funding allocation). Council's early-works REF is a distinct, historical assessment and does not confirm the timing, extent or duration of any 2028–29 full closure. Current staging and detours must be verified with Council.

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha