SECTION **18**

Workforce Camps Hubs and Laydown Areas

THIS IS **ONE** SECTION OF **TWENTY TWO,**

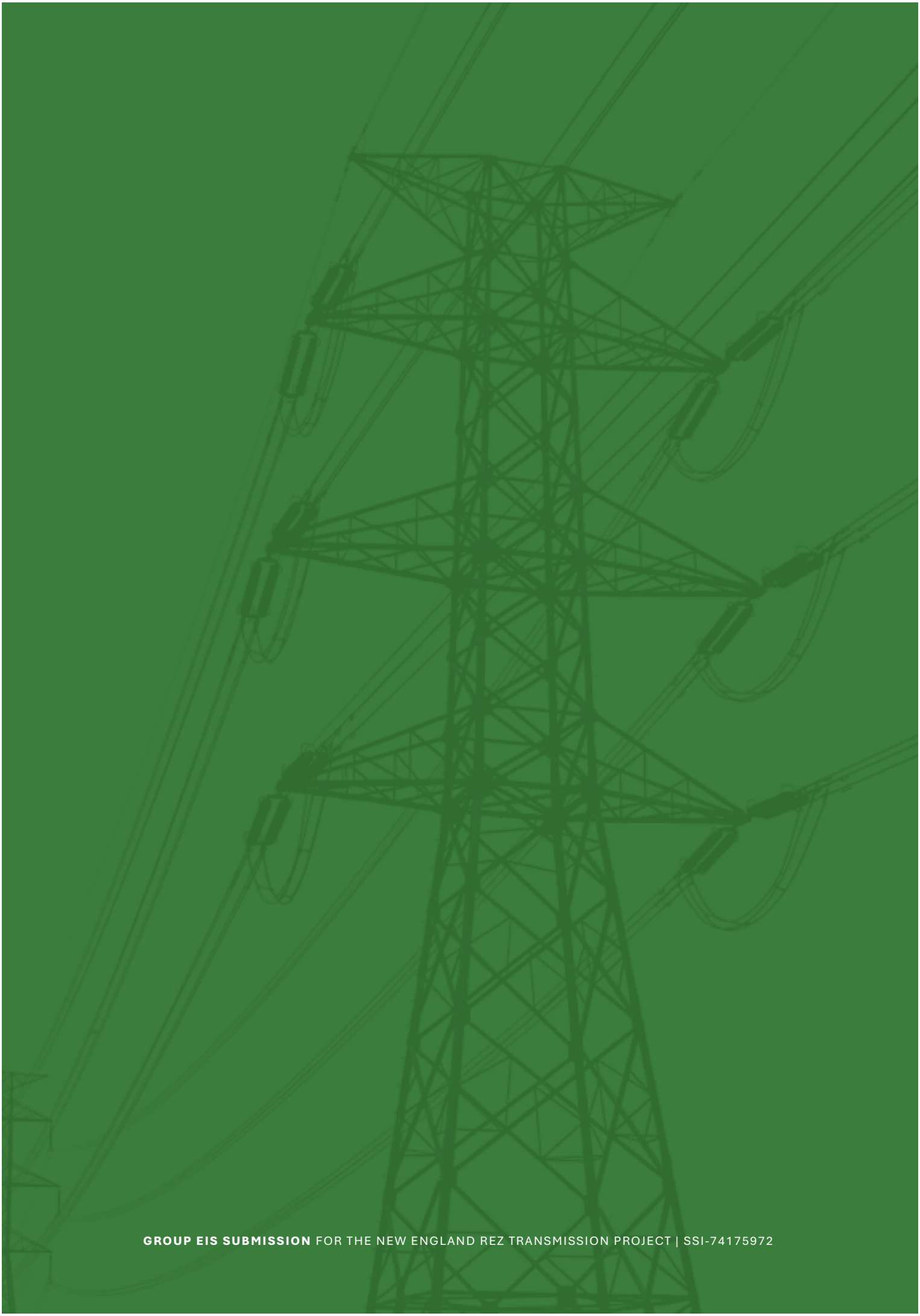
THAT FORMS PART OF A LARGER GROUP SUBMISSION

TO THE NEW ENGLAND REZ TRANSMISSION PROJECT

SSI-74175972



Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter Responsible Infrastructure Group | Voice for Walcha



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

SECTION **18**

Workforce Camps, Hubs and Laydown Areas

Key issues we have found ...

Unassessed camps need public scrutiny

Barry camp and the alternative Muswellbrook site require completed assessments and public exhibition, so neighbours can scrutinise impacts before approval.

Industrial sites lack fixed locations

Batching plants, crushing operations and helipads lack fixed locations, leaving neighbours unable to assess noise, dust, traffic and local impacts.

Essential camp services remain unsecured

Water, wastewater disposal, power and emergency services lack confirmed arrangements, despite camps being proposed within small communities with limited capacity.

Neighbours face unresolved noise impacts

Hub noise barriers remain uncommitted; camp noise predictions exceed screening levels for sleep disturbance, requiring confirmed layouts and binding mitigation.

Farmland acquisitions need proper justification

Large acquisition areas lack defined built footprints and adequate farm assessments, leaving the need and future land use poorly explained.

Temporary sites need guaranteed restoration

Camps and laydowns need binding removal deadlines, agreed rehabilitation standards and financial security so temporary occupation leaves no lasting liability.

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Read in more detail >





> Images show Central West REZ Workers Camp and Hub

SECTION **18**

Workforce Camps, Energy Hubs and Laydowns

EXECUTIVE SUMMARY

The EIS does not meet the Planning Secretary's Environmental Assessment Requirements (SEARs) for the workforce camps, energy hubs and ancillary sites. The SEARs make these sites part of the project, yet one 320-bed camp (Camp 3 at Barry) has not been located or assessed, a second camp has an unassessed alternative site, and batching plants, crushing plants and helipads can be placed anywhere in the 10,928 ha project area after approval.

Because the exhibited EIS does not describe the project for which approval is sought, it must be revised and re-exhibited once every camp and ancillary site has been located and assessed. A later report that the public cannot comment on is not an adequate substitute.

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SEARs requirements not met

The SEARs expressly include workforce accommodation camps, laydown and staging areas, crushing and screening plants, concrete batching plants and helicopter landing pads as part of the project (SEARs, Project description, p. 1). The EIS does not meet the following requirements for them:

Page references: main EIS pages are PDF pages of EIS-02 (printed page = PDF page − 35); technical report pages are PDF pages of that report; CWO Submissions Report pages are printed pages (PDF page = printed + 31).

SEARs requirement	What the SEARs say	What the EIS does
General Requirements: project description	'a full description of the project, accompanied by suitable maps and plans, including the... disturbance area; physical layout of the project'	Camp 3 and Camp 1 Alternate are not located or assessed (EIS-02 PDF p. 146); no camp has a fixed position in its land (TR09 p. 64); batching, crushing plants and helipads may go 'anywhere within the project area' (PDF pp. 171–172)
Biodiversity	The BDAR must 'assess the impacts associated with all ancillary infrastructure'	Camp 3 and Camp 1 Alternate are not in the BDAR; unlocated ancillary sites are assessed only where the project area was surveyed (54 per cent)
Water and Soils	'details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation (including consultation with suppliers)'	No potable source confirmed for about 2,060 camp places; wastewater to an unnamed 'licenced wastewater facility'; no supplier confirmation (PDF pp. 101, 173)
Waste	'identify, quantify and classify the likely waste streams... (in consultation with waste facilities, including Councils)'	Camp domestic waste and sewage sludge not quantified; no receiving facility or council agreement named (PDF pp. 796–810)
General Requirements: consistency	'consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed'	Three laydowns assessed in the technical reports (Barry Road; two Camp 2 laydowns) do not appear in the acquisition table, Table 3.5, and no other row is said to include them (TR14 pp. 59, 69; PDF p. 138); the Albano Road laydown is placed 'north-east of Muswellbrook' in Table 3.5 but at Rouchel Brook in the technical reports; hub land is 1,185 ha in the text and 1,190 ha in the table (PDF pp. 537, 138); the traffic report routes Camp 2 traffic through Gundy while the noise report adds almost none to Gundy Road (TR07 p. 119; TR09 p. 165)

> Table ES1 - **SEARs requirements not met for camps, hubs and ancillary sites**

Noise (the ICNG construction assessment), bushfire (emergency egress and evacuation) and social impact (community infrastructure and services) are also only partly addressed: Camp 3 has no noise or evacuation assessment, and hub operational noise compliance depends on uncommitted barriers.

Severe deficiencies

- **An unassessed 320-bed camp.** Camp 3 'has not been assessed in detail as part of this EIS' (EIS-02 PDF p. 146); its assessment is deferred to an Amendment Report (a preferred infrastructure report under EP&A Act s 5.17) that the Planning Secretary may, but need not, exhibit; the Department's guidance

says that 'in most cases, the PIR is not exhibited'. Its neighbours, traffic, water, wastewater, bushfire, biodiversity and heritage impacts would be decided without public comment.

- **No camp has a fixed site.** 'Specific camp locations have not yet been determined' for any of the five camps (TR09 p. 64), so distances to dwellings, drainage paths and helipad positions are unknown.
- **Unexplained farmland acquisition.** Camp 2 is a 780 ha full acquisition for about 320 workers, and the Timor Crawney Road laydown is 165 ha (Table 3.5, PDF p. 138), with no description of the land and no agricultural, equine, visual or social assessment of the sites.
- **Industrial sites without locations.** Batching, crushing and screening plants, helipads and 'high volume laydown' are left to a 'location assessment protocol' with no fixed criteria and no sign-off outside EnergyCo and its contractor (PDF pp. 171–172).
- **Hub noise compliance on uncommitted design.** Operational noise meets criteria only with 'indicative four metre high noise barriers' that no measure commits to (TR09 pp. 10, 93); auxiliary power lines to hubs and camps 'have not been assessed as part of this EIS' (PDF p. 118).
- **Below EnergyCo's own precedent.** At Central-West Orana two years ago, the same proponent named, sited and assessed its camps and compounds, and DPHI conditioned them on that basis.

We ask that the EIS be revised and re-exhibited once Camp 3 and every other camp and ancillary site has been located and assessed, that approval be confined to sites so assessed, and that the camps be conditioned at least to the standard EnergyCo accepted at Central-West Orana.

Deficiencies

The EIS does not presently demonstrate that the camps, hubs and ancillary sites are described with the precision required by the SEARs General Requirements (project description) and s 192(1)(d) of the EP&A Regulation 2021, or that their impacts have been assessed.

In particular, the EIS does not adequately resolve:

- the location of Camp 3 at Barry and of Camp 1 Alternate, neither of which is assessed (EIS-02 PDF pp. 102, 146). Without them, the exhibited EIS does not describe the project for which approval is sought, and it must be re-exhibited once they are assessed;
- the position of any camp within its acquired land, so distances to dwellings, drainage paths and helipad locations are unknown (TR09 p. 64);
- why 780 ha is acquired for a 320-bed camp, and 165 ha and 210 ha for two laydowns, and what happens to that farmland (PDF p. 138);
- the sources of potable water, the destination of effluent, sludge and waste, and the power supply routes for about 2,060 camp places (PDF pp. 101, 118, 173);
- health and emergency service arrangements for camps in localities the SIA finds have 'very low or no existing service provision capacity' (TR04 p. 164);
- hub operational noise without uncommitted 4 m barriers, and the hubs' generator connections and auxiliary lines (TR09 pp. 10, 93; PDF pp. 117–118);
- the location of batching plants, crushing and screening plants, helipads and 'high volume laydown', which may be placed 'anywhere within the project area' (PDF pp. 171–172); and
- decommissioning dates, rehabilitation standards and security for camps and laydowns (PDF pp. 147, 172).

1 | Workforce accommodation camps

1.1 Evidence

The EIS proposes five camps accommodating 'around 320 workers' each at Camps 1 to 3 and 'around 550 workers' each at Camps 4 and 5 (PDF p. 146), a combined capacity of about 2,060, against a peak workforce of 'around 1,400' on site at any one time (PDF pp. 102, 143). The camps operate 24 hours a day for about six years (PDF p. 142). Each has a helipad, laydown, wastewater treatment plant, diesel generators and on-site health practitioners (PDF p. 147). Enabling crews of about 40 per camp are first housed in local short-term accommodation for six months (TR04 p. 162).

Camp	Location (EIS)	Beds / land	Nearest dwelling	Status in the EIS	Pages
Camp 1	Inglewood Road, Muswellbrook (Muscle Creek)	~320 / 300 ha full acquisition	785 m	Assessed; may be replaced by Camp 1 Alternate	PDF pp. 102, 138, 145–146; TR09 p. 60; TR07 p. 119
Camp 1 Alternate	New England Highway, Muswellbrook, identified with Muswellbrook Shire Council	~320 / not stated	Not stated	Assessment 'will also be undertaken following exhibition of the EIS and included in an Amendment Report'	PDF p. 146; TR09 p. 21
Camp 2	Waverley Road, ~21 km NE of Gundy; Calfshed Gully catchment; access via Gundy Road	~320 / 780 ha full acquisition	581 m; 1 highly noise affected receiver during camp and ancillary site construction (TR09 p. 63)	Assessed at project-area scale; placement within the 780 ha undetermined	PDF pp. 138, 146; TR07 pp. 92, 119; TR09 pp. 60, 63; TR14 p. 59
Camp 3	'Barry Road, Barry' (Table 3.1); 'only recently been identified', option found May 2026 (p. 146)	~320 / not stated; not in Table 3.5	'Location not currently known'	'has not been assessed in detail as part of this EIS'; to Amendment Report	PDF pp. 102, 146; TR09 pp. 21, 60, 64–65; TR07 p. 92; TR12 p. 65
Camp 4	Central South Hub, Oxley Highway, Walcha Road; within hub footprint	~550 / within hub acquisition (300 ha)	275 m	Assessed at project-area scale	PDF pp. 102, 138, 146; TR09 p. 60; TR14 pp. 59, 99
Camp 5	Central Hub A, Glenburnie Road, Kentucky; within hub footprint	~550 / within hub acquisition (335 ha)	600 m	Assessed at project-area scale	PDF pp. 102, 138, 146; TR09 p. 60; TR14 p. 59

> Table 1 - **Workforce accommodation camps as described in the EIS**

How each technical report dealt with the camps, hubs and laydowns is set out in Appendix A.

1.2 EIS shortcoming

Camp 3 is approved in principle without an assessment.

The EIS fixes 'Camp 3 – Barry Road, Barry' in Table 3.1 (PDF p. 102) and admits that it 'has not been assessed in detail as part of this EIS' (PDF p. 146). The technical reports either omit it or assume it: 'location not currently known' (TR09 p. 21); 'access is assumed to be via Barry Road' (TR07 p. 92); an APZ range table because the 'location is not yet determined' (TR12 p. 65); no social baseline; not in the BDAR. A Submissions or Amendment Report is exhibited only if the Department chooses, so the community's only guaranteed opportunity to comment on a 320-bed camp is now, and there is nothing to comment on.

The EIS itself says the Camp 3 assessment will be 'included in an Amendment Report' after exhibition (PDF p. 146). Under s 5.17(6)–(7) of the EP&A Act the Planning Secretary may require a response to submissions and a preferred infrastructure report (the document the EIS calls an Amendment Report), and may, but need not, exhibit it. The Department's own guidance states that 'in most cases, the PIR is not exhibited' (DPHI, SSI Guide Appendix E – Preparing a Preferred Infrastructure Report, s 1.3). The camp's site, neighbours, traffic, water, wastewater, bushfire, biodiversity and heritage impacts would therefore be decided without any public comment. That is why the EIS must be revised and re-exhibited, not supplemented, once Camp 3 is located and assessed.

Camp 1 Alternate is a second unassessed camp.

A 'recently identified potential alternative location' on the New England Highway (PDF pp. 102, 145–146) has noise distance tables (TR09 Tables 35–36) but no traffic, flooding, biodiversity or social assessment.

No camp has a fixed position inside its land.

'At this stage of the project specific camp locations have not yet been determined and the assessment assumes that noise sources… are located at the closest extent of the project area to each receiver location' (TR09 p. 64). Camp 2's land is 780 ha, so the assessment cannot say which dwellings will be 581 m or 2 km from the camp, which gullies take the wastewater, or where the helipad goes.

780 hectares for 320 workers is unexplained.

Camp 2 is a 780 ha full acquisition and Camp 1 is 300 ha (PDF p. 138). The acquisition footnote says these areas 'should not be equated to the size of the infrastructure'. The EIS does not say what the balance of the land is for, what it is used for now, or what happens to it after construction.

Bed numbers, housing and the smallest towns.

The SIA's conclusion that housing impacts will be 'minimal' rests on 'the project's existing workforce accommodation camp strategy' (TR04 p. 160), while conceding that 'their effectiveness will depend on workforce composition, camp occupancy rates and the extent to which non-resident workers access local accommodation' (TR04 p. 163). Camp 2's 40-person enabling crew would take 71.4 per cent of the 56 short-term rooms within an hour's drive; Camp 3's would take 31.4 per cent of Nundle and Hanging Rock's rooms (TR04 p. 162).

Services for about 2,060 camp places are a list of possibilities.

Potable water of 340 ML is to be 'sourced from existing water supplies or purchased via vendor' (PDF p. 101); 'EnergyCo has engaged with councils, AGL and WaterNSW' (PDF p. 173). Wastewater is to be 'disposed of at a licenced wastewater facility' (PDF p. 101), with no facility named. Power is from grid connections whose routes 'have not been assessed as part of this EIS' (PDF p. 118) or diesel generators. Waste goes to unnamed landfills. Construction water supply and the Camp 2 (Waverley Road) water case study are dealt with in Section 8 (Water); this section relies on that analysis and does not repeat it.

Health and emergency services are absent.

The SIA finds Barry, Kentucky and Walcha Road have 'very low or no existing service provision capacity', and that 85.4 per cent of suburbs crossed have no ambulance station or hospital (TR04 p. 164). The answer offered is on-site practitioners and telehealth (TR04 p. 165).

Camps are built as enabling works before management plans exist.

Camp site establishment is enabling work that 'does not include activities that trigger the requirement for implementation of the CEMP or other specialist environmental management plans' (PDF pp. 144–145).

Night noise, traffic and decommissioning.

Six receivers exceed the sleep disturbance screening level from 24/7 camp operation, Camp 2 the worst (TR09 pp. 63–64); the mitigation is 'judicious placement… within the project area', which no measure secures. Camp 2 traffic runs 'New England Highway → Gundy Road → Waverley Road' through Gundy (TR07 p. 119), yet the noise report adds almost no traffic to Gundy Road (TR09 p. 165). Camp 3 traffic runs through Nundle on Barry Road, shared with Hills of Gold construction (TR07 pp. 119, 151). Camps 'would be removed on completion of construction' (PDF p. 147), with no timeframe, standard or bond; councils' requests for legacy housing are 'outside the scope of the project' (TR04 p. 160).

1.3 Consequences

Unless the EIS is re-exhibited, the decision-maker would approve camps whose location, footprint, servicing and neighbours were never put to the public. The standard condition DPHI uses (camps built 'as described in the EIS') cannot attach to a camp the EIS does not describe. The SIA's housing conclusion stands on camps that are not secured, so the residual social impact on Scone, Aberdeen, Murrurundi, Nundle and Hanging Rock is unassessed.

> POSITION SOUGHT

1. Once Camp 3 and Camp 1 Alternate are located and assessed, the EIS must be revised and re-exhibited for public comment before determination. An Amendment Report or Submissions Report that the public cannot comment on is not an adequate substitute.
2. If they are not re-exhibited, the approval must exclude Camp 3 and Camp 1 Alternate, and any later camp must be a modification under s 5.25 with public exhibition.
3. For each camp, EnergyCo should provide the footprint within the acquired land, the nearest dwellings to that footprint, and night-time noise, lighting and traffic at those dwellings.
4. EnergyCo should explain each acquisition (780 ha, 300 ha), the current farm enterprise on the land, and its use during and after construction.
5. EnergyCo should provide written confirmation from the receiving council or utility for water, effluent, sludge and waste for each camp, and the assessed power supply route.
6. EnergyCo should state what share of the workforce is assumed to live in camps and test the housing impact if occupancy is 60 per cent or a camp is six months late.

2 | Energy hubs and permanent facilities

2.1 Evidence

Facility	Location	What it is	Land	Nearest dwelling	Pages
North Hub	Romani Road, Boorolong	330 kV switching station, sized not to preclude 500 kV; equipment to ~28 m; harmonic filters (4 m barrier assumed)	210 ha partial	160 m	PDF pp. 113–114, 138; TR09 pp. 10, 60
Central Hub A	Glenburnie Road, Kentucky	500/330 kV substation; 3 × 1,500 MVA transformers; 2 synchronous condensers; equipment to ~38 m; hosts Camp 5	335 ha partial	590 m	PDF pp. 114–115, 138; TR09 pp. 10, 60
Central Hub B	Thunderbolts Way, Uralla	500/330 kV substation; 4 × 1,500 MVA transformers; 1 synchronous condenser	310 ha full/partial	400 m	PDF pp. 115, 138; TR09 p. 60
East Hub	Hillview Road, Salisbury Plains	330 kV switching station; equipment to ~28 m	35 ha partial	1,780 m	PDF pp. 115–116, 138; TR09 p. 60
Central South Hub	Oxley Highway, Walcha Road	500/330 kV substation; 3 × 1,500 MVA transformers; hosts Camp 4	300 ha partial	1,130 m	PDF pp. 116–117, 138; TR09 p. 60
Nemingha maintenance facility	Nemingha, Tamworth	Permanent operations base	1.5 ha full	<10 m; 4 highly noise affected receivers	PDF pp. 100, 138; TR09 pp. 60, 63
Bayswater substation extension	Bayswater Power Station	500/330 kV extension	7.5 ha partial	2,700 m	PDF pp. 100, 138; TR09 p. 60

> Table 2 - **Energy hubs and permanent facilities**

Hub acquisition is 'approximately 1,185 hectares' in the land use chapter (PDF p. 537), while the five hub rows in Table 3.4 sum to 1,190 ha; the table total of 1,199 ha adds the Nemingha facility and the Bayswater extension (PDF p. 138).

2.2 EIS shortcoming

The hubs are described as equipment lists, not as sites.

'The final number and configuration of hub components would be confirmed during the detailed design phase' (PDF p. 113), and acquired areas 'should not be equated to the size of the infrastructure' (PDF p. 138). The reader cannot tell how much of each acquisition is switchyard, laydown, APZ, water dam or spare.

Generator connections and auxiliary power are excluded.

Hubs are designed 'to accommodate connection infrastructure from renewable generation projects which are subject to separate planning and approval processes' (PDF p. 117). Auxiliary supply routes 'have not been assessed as part of this EIS' (PDF p. 118). Each hub will sit at the centre of generator lines and new distribution poles that no cumulative visual, noise or land-use assessment includes.

Operational noise compliance depends on uncommitted barriers.

Only with 'indicative four metre high noise barriers' at Central Hub A and North Hub is operational noise 'predicted to be below the PNTLs at all residential receivers' (TR09 pp. 10, 93). North Hub is 160 m from a dwelling. Appendix F does not require the barriers; the hub descriptions say noise walls 'if required' (PDF p. 114).

Camps 4 and 5 sit inside hub construction sites.

550 people will sleep for six years inside the busiest construction sites on the project (TR14 pp. 59, 99). The noise report assesses the camps' effect on neighbours, not the hubs' effect on camp occupants.

Nemingha, lighting and land take.

The Nemingha facility is under 10 m from a receiver, with 4 highly noise affected receivers during intensive construction (TR09 pp. 60, 63), and has no visual or social assessment of its own. Hubs have dusk-to-dawn lighting for the project life (PDF p. 118), with no night-time photomontage. About 1,200 ha is acquired for hubs, but agricultural loss is valued on the 471 ha operational footprint (PDF p. 571); some 700 ha of acquired farmland is neither valued nor given a future use.

2.3 Consequences

Approval would fix substations and their noise, lighting and connections before their footprints and design are known, leaving compliance to detailed design that the public will not see.

> POSITION SOUGHT

1. Hub noise barriers, equipment selection and enclosures should be fixed in the conditions, with receiver levels without barriers disclosed now.
2. Auxiliary power routes and generator connection corridors should be assessed and exhibited before hub construction.
3. EnergyCo should provide the built footprint of each hub against the acquired area, and the future use of the balance.

3 | Laydowns, compounds, batching plants and helipads

3.1 Evidence

Site	What the documents say	In Table 3.5?	Pages
Timor Crawney Road laydown (two areas)	165 ha full acquisition; tributaries of Bushes Creek 'may require filling, and/or re-direction'; four farm dams in footprint; Isis River 60 m west; nearest residence 200 m; helipad likely	Yes	PDF p. 138; TR14 pp. 59, 69, 99, 103; TR09 pp. 60, 101; TR06 p. 54
Albano Road (Rouchel Brook) laydown	210 ha full acquisition; partly in waterfront land of a 4th-order reach of Stony Creek; nearest residence 770 m; in the Rouchel anthrax district	Yes (mislabelled 'north-east of Muswellbrook')	PDF p. 138; TR14 pp. 59, 99; TR09 p. 60; TR20 pp. 17–18
Barry Road laydown (two areas)	On a ridgeline in the upper Chaffey Dam catchment; nearest residence 1,425 m	No	TR14 pp. 44, 59, 103; TR09 p. 60
Camp 2 laydowns (two)	Described in the water and visual reports only	No	TR14 p. 69; TR05 p. 185
Batching, crushing and screening plants; helipads; 'high volume laydown'	'may be located at suitable sites anywhere within the project area subject to the location assessment protocol'	No	PDF pp. 102, 171–172
Water management dams	'constructed as needed within the project area' under harvestable rights	No	PDF p. 174

> Table 3 - **Laydowns, compounds and other ancillary sites**

Total full acquisition for camps and laydowns is 1,455 ha (Table 3.5), plus 1,199 ha for hubs and permanent facilities (Table 3.4): about 2,650 ha of land acquisition, full or partial, against a 471 ha operational footprint.

3.2 EIS shortcoming

The exhibited list of ancillary sites is not the real list.

Table 3.5 names two laydowns. The technical reports assess five. Section 3.3.12 then allows further sites 'anywhere within the project area subject to the location assessment protocol' (PDF p. 172). The EIS itself concedes that 'ancillary sites have the potential to result in greater environmental and social impacts than routine construction activities and therefore require additional assessment, siting and mitigation' (PDF p. 171).

The location assessment protocol is not a control.

Its considerations include 'separation distances from sensitive receivers' (no distance stated) and avoiding flood-prone land 'where practicable'. There is no decision-maker outside the proponent, no notification and no publication; 'the final locations would be confirmed during detailed design and documented in the CEMP' (PDF p. 172).

Batching, crushing plants and helipads have no locations.

No site, throughput, dust or noise assessment is given for materials processing (PDF pp. 171, 174). Helipads are 'likely to be established at each of the laydown areas plus at Crawney Road North Timor' (TR06 p. 54), with 'high LAmax noise levels' predicted near the Waverley and Timor sites (TR09 p. 101). There are no flight paths, hours, fuel storage or equine and livestock assessment. The effect of helicopter operations and easement restrictions on farming is addressed in Section 11 (Effects on Farming).

The named laydowns are large farms with no site assessment.

Neither Timor Crawney Road nor Albano Road is assessed as a land-use change, an agricultural loss, a visual object or a social presence. The Barry Road and Camp 2 laydowns are not in the acquisition table, so either they sit within other acquisitions (not stated) or the 1,455 ha total is wrong.

Built before plans exist, and no rehabilitation standard.

Establishing ancillary facilities is enabling work outside the CEMP (PDF p. 144). Sites 'would be rehabilitated following completion of construction activities' (PDF p. 172), with no standard, timing, bond or landholder sign-off.

3.3 Consequences

The public is asked to comment on a project whose industrial sites can be anywhere in 10,928 ha. There is nothing to which a site-specific condition can attach, and new sites would be approved inside a contractor's management plan without public scrutiny.

> POSITION SOUGHT

1. The approval should be confined to ancillary sites identified and assessed in an exhibited document. Any other camp, laydown, batching plant, crushing plant or helipad should be a modification under s 5.25 with public exhibition. No 'location assessment protocol'.
2. EnergyCo should explain the 165 ha and 210 ha laydown acquisitions, state whether any dwelling will be acquired, and identify whether the Albano Road laydown is on a Rouchel anthrax property.
3. Helipad locations, flight paths and hours should be fixed and notified, with separation from equine facilities set with DPIRD.

4 | Central-West Orana: the same proponent, two years earlier

4.1 Evidence

EnergyCo's Central-West Orana REZ Transmission project (SSI-48323210) was exhibited in September–October 2023, amended in May 2024 and approved on 26 June 2024; the consolidated approval cited was last modified on 2 December 2025. It is the direct precedent for how EnergyCo describes camps, hubs and laydowns and how DPHI conditions them. CWO page references are PDF pages of the exhibited CWO EIS main report (printed chapter page in brackets).

Matter	CWO EIS (2023)	NE REZ EIS (2026)
Camp site and size	'about 41 hectares in size and would accommodate up to 1,200 people', next to the Merotherie Energy Hub compound (PDF p. 172 [3-60]); satellite camp 'at 118 Neeleys Lane, Turill… up to 600 people' (p. 173 [3-61])	Camp 2: 780 ha full acquisition, ~320 workers; no address, no camp footprint (PDF pp. 138, 146)
Hub sizes	Merotherie and Elong Elong hubs 'around 200 hectares and 75 hectares respectively, inclusive of the required APZ buffers' (p. 131 [3-19])	Acquisition areas of 35–335 ha that 'should not be equated to the size of the infrastructure' (p. 138)
Compounds and processing	Crushing, grinding and screening 'would be located at the New Wollar Switching Station, Merotherie Energy Hub and Elong Elong Energy Hub construction compounds' (p. 166)	'may be located at suitable sites anywhere within the project area' (p. 171)
Criteria for additional sites	'separated from the nearest residences by at least 200 metres', 'above the 20 year average recurrence interval flood level', 'subject to further assessment and approval' (p. 171 [3-59])	'separation distances from sensitive receivers' (no distance); confirmed 'during detailed design and documented in the CEMP' (p. 172)
Potable water	'sourced from council owned potable water supplies in Dunedoo and Coolah… and Gulgong where possible' (p. 177 [3-65])	'sourced from existing water supplies or purchased via vendor' (pp. 101, 173)
Camp wastewater	WWTP to AS/NZS 1547; 240 L per person per day; establishment wastewater to a council treatment plant (pp. 177–178)	'disposed of at a licenced wastewater facility' (p. 101); no design basis or facility
Camp power	Connection to the local power grid; annual demand stated (p. 178 [3-66])	Routes 'have not been assessed as part of this EIS' (p. 118)
Peak workforce vs camp capacity	Up to around 1,800 personnel; camps for up to around 1,800 (pp. 146–147)	~1,400 personnel on site at any one time; capacity for about 2,060 (pp. 102, 143, 146)

> Table 4 - **What the CWO EIS stated that the NE REZ EIS does not**

Condition	Requirement	NE REZ position
B52	Camps constructed and operated 'as described in the EIS'	Impossible for Camp 3 and Camp 1 Alternate, which the EIS does not describe
B53	Accommodation Camp Management Plan approved before camp construction: utilities to council standards, wastewater reuse standards, capacity per camp, layout and servicing, worker health	Partly anticipated by SO4 (Workforce Management Plan), with no utilities, capacity or servicing content
B56	Camps decommissioned and rehabilitated within 12 months of operations commencing	No timeframe
B57	Ancillary facilities rehabilitated within 6 months of the end of their use	No timeframe
B7	Mitigation in place before camp or compound activities exceeding noise or sleep criteria start	Six sleep-disturbance exceedances accepted; mitigation is 'judicious placement'
B18	Water management at substations, batching plants, compounds and camps	Batching plant locations unknown
C8	Final Layout Plans of towers and ancillary facilities, compared to the approved layout, before construction	Nothing comparable; the location assessment protocol would operate inside the CEMP

> Table 5 - **How DPHI conditioned the CWO camps and ancillary sites (Consolidated Approval)**

At CWO, councils and Transport for NSW asked for camp layouts, decommissioning dates, accommodation strategies, origin–destination surveys, SISD checks, turn warrants and swept paths (CWO Submissions Report pp. 389–390, 432, 465, 529–530). Upper Hunter Shire Council was among them. The same councils and agencies will assess this EIS.

The full CWO comparison, including all conditions and the questions councils and agencies asked at CWO, is in Appendix D.

4.2 EIS shortcoming

Every row of Table 4 is a matter EnergyCo was able to state two years ago and has not stated now, for a project with more than twice as many camps on a line nearly twice as long. At CWO, EnergyCo also committed that 'any future upgrades or augmentation… that are not consistent with the planning approval would be considered a project modification'; the NE REZ EIS is silent.

4.3 Consequences

The NE REZ EIS falls below the proponent's own precedent. The failure to name, site and assess Camp 3 and Camp 1 Alternate is a choice, not a limitation of the process.

> POSITION SOUGHT

1. Use of the camps by other REZ projects, or any augmentation, should be a modification under s 5.25, given that camp capacity (about 2,060) exceeds the stated peak workforce on site (about 1,400) and the EIS does not explain the ratio.
2. TfNSW-standard intersection assessment (SISD, turn warrants, swept paths) should be required for the Camp 2, Camp 3, Central Hub A and Central South Hub accesses before use.

Questions the EIS must answer before determination

Where is Camp 3, on whose land, what area, and when will its assessment be publicly exhibited?

Which Camp 1 site is proposed, and on what basis will the other be dropped?

For each camp: the exact footprint within the acquired land, the nearest dwellings to that footprint, and the night-time noise, lighting and traffic at those dwellings.

Why 780 ha for Camp 2, 300 ha for Camp 1, and 165 ha and 210 ha for the two laydowns; what is on that land now; what will it be used for during and after construction?

What share of the 1,400 peak workforce is assumed to live in camps, and what is the housing impact if occupancy is 60 per cent or a camp is six months late?

Who supplies 340 ML of potable water, where does each camp's effluent and sludge go, which landfill takes the waste, and has each receiving council or utility confirmed capacity in writing?

Where will the auxiliary power lines to each hub and camp run, and when will they be assessed and exhibited?

Where are the concrete batching, crushing and screening plants, and what are their throughputs?

Where are the helipads, what are the flight paths and hours, and which equine and livestock operations lie under them?

Which intersections serving camps and hubs have been checked for SISD, turn warrants and swept paths, and with what results?

What are hub operational noise levels at each receiver without the assumed 4 m barriers, and will the barriers be conditioned?

Will the camps be used for other REZ projects, and will any augmentation be a modification under s 5.25?

What is the decommissioning date and rehabilitation standard for each camp and laydown, and what security is offered?

What ambulance, police and hospital arrangements exist for 550-bed camps at Walcha Road and Kentucky and a 320-bed camp at Barry?

How many new harvestable-rights dams will be built on the acquired land, and which downstream landholders are affected?

> POSITION SOUGHT

Camp 3 has not been located or assessed.

The EIS must therefore be revised and re-exhibited once Camp 3, Camp 1 Alternate and every other camp and ancillary site has been located and assessed, and the Department and Planning Minister should not determine the project before then.

Accordingly, the submission seeks the following position:

1. Because Camp 3 is unlocated and unassessed, EnergyCo should be required to prepare a revised EIS that fixes and assesses all camps, hubs, laydowns, batching and crushing plants and helipads, and the Department should re-exhibit it for public comment. A Submissions or Amendment Report that the public cannot comment on is not an adequate substitute.
2. The Minister should refer the assessment to the Independent Planning Commission for advice and a public hearing under s 2.9 of the EP&A Act, because the material on these sites is incomplete and needs independent testing.
3. Approval should be confined to camps and ancillary sites identified and assessed in an exhibited document; any other site should be a modification under s 5.25 with public exhibition.
4. An Accommodation Camp Management Plan on the CWO B53 model should be approved before any camp construction, with a capacity cap per camp, written servicing confirmation, a minimum separation to dwellings consistent with no sleep-disturbance exceedance, and camps for this project only.
5. Camp construction should not be classed as enabling work; the noise, traffic, soil and water and social plans should apply from the first earthworks.
6. Camps should be decommissioned within 12 months of energisation of the stage they serve, and ancillary sites within 6 months of last use, to a standard agreed with the landholder and council and secured by bond.
7. Hub noise barriers and equipment should be fixed in the conditions, with operational monitoring including tonality and low-frequency assessment, and results published.
8. A property-specific assessment of each acquired camp and laydown parcel (farm enterprise, dwellings, water, access) should be published before acquisition is completed, with a statement of post-construction land use.
9. On-site medical capacity at each camp should be supported by a funded agreement with NSW Ambulance and the local health district, and the Workforce Management Plan should cap local accommodation use during enabling works in Scone, Aberdeen, Murrurundi, Nundle and Hanging Rock.

This is not a request that EnergyCo finalise every engineering detail before approval. It is a request that the sites where about 2,060 people will live and where industrial activity will run for six years are known, assessed and open to public comment before the decision that gives them planning authority.

Key references

Environmental Planning and Assessment Act 1979 (NSW), Division 5.2, particularly ss 2.9, 5.17, 5.25.

Environmental Planning and Assessment Regulation 2021 (NSW), s 192(1)(d).

Planning Secretary's Environmental Assessment Requirements (SEARs), SSI-74175972, amended August 2026: General Requirements (project description; consistency), Biodiversity, Water and Soils, Waste, Social Impact.

EnergyCo, New England REZ Network Infrastructure Project EIS, October 2026: EIS-02 Chapter 3 (PDF pp. 100–119, 137–151, 158, 171–174, 181), PDF pp. 537, 571, 762, 804; Appendix F mitigation measures.

Technical Reports: TR04 Social Impact pp. 159–165; TR05 Landscape and Visual pp. 185, 195, 200; TR06 Agriculture pp. 54, 57; TR07 Traffic pp. 92, 119, 151; TR09 Noise and Vibration pp. 10, 21, 30, 58, 60–65, 75, 93, 101, 165; TR12 Bushfire pp. 5–6, 61, 64–65; TR14 Surface Water pp. 44, 59, 69, 99, 103; TR20 Anthrax pp. 17–18.

EnergyCo, Central-West Orana REZ Transmission EIS (2023), Chapter 3, PDF pp. 131, 146–148, 154–159, 166–167, 171–180.

EnergyCo, Central-West Orana REZ Transmission Submissions Report (December 2024), pp. 52–54, 389–390, 432–433, 465–466, 529–530.

Central-West Orana REZ Transmission (SSI-48323210), Consolidated Infrastructure Approval, conditions B7, B18, B45, B46, B52–B57, C8–C9.

NSW Department of Planning, Housing and Infrastructure, SSI Guide Appendix E – Preparing a Preferred Infrastructure Report (2026), s 1.3.

NSW Department of Planning and Environment, Social Impact Assessment Guideline for State Significant Projects (2023), Appendix C, review question 19.

M12 Motorway (SSI 9364) Consolidated Conditions of Approval (MOD 1, 2024), conditions A15–A16 (additional construction ancillary facilities).

Appendix A
How each discipline assessed the camps, hubs and laydowns

Main EIS pages are PDF pages of EIS-02 (printed page = PDF page − 35); technical report pages are PDF pages of that report.

Discipline	What was done	What was not done	Pages
Noise (TR09)	Worst-case construction and 24/7 operation modelled for Camps 1, 2, 4, 5, three laydowns, the maintenance facility and the hubs, with noise sources placed 'at the closest extent of the project area to each receiver'; Camp 3 given distance-based thresholds only (exceedances within 1,300 m during establishment, 1,080 m at night, sleep disturbance within 325 m); hub operational noise compliant only with 'indicative four metre high noise barriers' at Central Hub A and North Hub	Camp 3 and Camp 1 Alternate not assessed; no receiver counts for camp-generated road traffic at night (shift buses); no assessment of helipads at camps beyond 'high LAmax' at Waverley and Timor; the barriers are not in Appendix F	TR09 pp. 10, 21, 60–65, 93, 101
Traffic (TR07)	Camp access points, primary routes and peak daily movements per camp (Table 3.6: 386 to 1,316 movements a day); enabling-works traffic described as low; road treatments listed	No origin–destination or shift-timing analysis; no assessment of the Camp 1 Alternate access on the New England Highway; Camp 3 'access is assumed to be via Barry Road'; the traffic and noise reports disagree on whether Camp 2 supply runs through Gundy village	TR07 pp. 92, 119; EIS-02 PDF pp. 149–150; TR09 p. 165
Social and housing (TR04)	Short-term room counts within an hour of each camp for a 40-person enabling crew; councils' preference for camps near towns recorded; health and emergency service capacity at camp localities assessed as 'very low or no'	Housing impact assumed 'minimal' because the camps will exist; no analysis of what happens if a camp is late, undersized or relocated; no legacy or re-use plan despite councils asking; no assessment of a 320-bed camp on Barry, which has 'no recorded population' and no social baseline	TR04 pp. 160, 162–165; EIS-02 PDF p. 146
Water and wastewater (TR14; EIS s 3, 18)	Catchment context and waterfront-land interactions for Camps 1, 2, 4, 5 and three laydowns; 340 ML potable for workforce and 272 ML non-potable for 'camp general maintenance' estimated; wastewater treatment plants proposed at camps	No potable source confirmed for about 2,060 camp places ('EnergyCo has engaged with councils, AGL and WaterNSW'); no sewage volume, treatment standard, effluent disposal route or receiving facility named ('disposed of at a licenced wastewater facility'); no s 68 Local Government Act approval pathway discussed for on-site systems; four farm dams removed at Timor with downstream detention loss 'to be considered during detailed design'	EIS-02 PDF pp. 101, 173–174, 185, 804; TR14 pp. 59, 99, 103
Waste (EIS s 23)	Waste streams listed generically	No quantification of camp domestic waste or sewage sludge, no receiving landfill or treatment plant capacity, no agreement with any council	EIS-02 PDF pp. 796–810
Air and odour (EIS s 20)	Camp wastewater plant odour judged 'not significant' on distance	No batching-plant or crushing-plant locations, so no dust assessment of them; dust from 780 ha of camp and laydown hardstand not modelled	EIS-02 PDF p. 762

Bushfire (TR12)	SFPP asset protection zones calculated for Camps 1, 2, 4, 5 and a range table for Camp 3; BAL 29 APZs for hubs; construction ancillary sites get APZs 'refined when the site layout of the laydown is determined'	Camp 3 APZ cannot be fixed; evacuation routes from camps (Waverley Road, Barry Road, single unsealed access) not assessed as evacuation routes; no RFS concurrence shown for SFPP camps	TR12 pp. 5–6, 64–65; App. A–B
Visual (TR05)	Viewshed review for camps and laydowns; a handful of dwellings assessed (N-39 D7 at 600 m from Camp 5; O-34 D4 at 295 m from Camp 4; I-17 DN6 at 550 m from the Timor laydown; I-15 DN9 at 745 m from the Camp 2 laydown); camp lighting section	Camps dismissed on 'low height… and the temporary nature of the works' for six years of 24-hour lighting; no night-time photomontage; hubs' 38 m equipment assessed but barriers and lighting towers not	TR05 pp. 195, 200
Biodiversity (TR01)	Camps and laydowns inside the project area are within the BDAR footprint	Camp 3 is not in the BDAR; Camp 1 Alternate is not; 'additional' ancillary sites anywhere in the project area are assessed only to the extent the surrounding project area was surveyed (54 per cent)	TR01 p. 69; EIS-02 PDF pp. 171–172
Heritage (TR02, TR03)	Hub and camp footprints inside the surveyed area are covered	Barry Station curtilage crossed by the corridor; Camp 3 and the Barry Road laydown sit in the section with 'minimal survey'; no camp-specific heritage assessment	TR02 p. 280; TR05 p. 127
Agriculture (TR06)	A paragraph on 'land use conflicts' between camps and farms (spraying, mustering, shearing) with mitigation 'as set out in Chapter 9'	No site-specific assessment of the 780 ha, 300 ha, 210 ha or 165 ha acquisitions as farms; no explanation of why 780 ha is needed; no statement of what the acquired land will be used for during or after construction ('subject to confirmation during detailed design')	TR06 p. 57; EIS-02 PDF p. 138
Hazards (EIS s 17)	Hubs: oil containment to 130 per cent of largest volume; preliminary risk screening	Diesel storage at camps and laydowns, helipad fuel, explosives magazines for blasting between Pages Creek and Niangala: locations and quantities not assessed	EIS-02 PDF pp. 117, 668–717; TR06 p. 55
Economics (TR08)	Workforce spend modelled by input–output	No camp procurement, catering or local-business displacement analysis; no cost of council services to camps	TR08
Cumulative (EIS s 24)	Other REZ projects listed; Regional Major Infrastructure Studies acknowledged but 'not directly comparable'	No cumulative camp-bed count across generators and this project; no reconciliation with the studies' accommodation findings; Hills of Gold shares Barry Road with Camp 3 traffic	EIS-02 PDF p. 812; TR07 p. 151

> Table A1 - **Assessment of ancillary infrastructure by discipline**

Appendix B
Appendix F mitigation measures covering ancillary infrastructure

Measure	What it says	Class
AG8	Camps 'will be designed and located to minimise potential land use conflicts... located away from cropping areas and farm infrastructure'	Consultation; no distance or criterion
SO4	'The Workforce Management Plan will be prepared and implemented'	Deferred to plan
BF5	SFPP APZ compliance for Camps 1, 2, 4, 5; 'Camp 3 site will be selected and designed to achieve SFPP APZ compliance'	Deferred to plan
BF6, BF9	Emergency Management Plans	Deferred to plan
BF7	BAL 29 APZs for laydown areas	Restates PBP
FL8	'Flood risk should be considered during site layout at detailed design stage. Where camps, laydowns or ancillary facilities are proposed within flood-prone areas, the need for setbacks... [will be considered]'	Deferred to detailed design
NV8	Aircraft noise measures 'where practicable and appropriate', notification	Deferred to plan
NV10	'Operational noise impacts from the energy hubs will be reviewed during detailed design'	Deferred to detailed design
AQ3	Measures 'will be implemented at concrete batch plants to minimise emissions'	Deferred to plan
GW3, GW4	Dewatering and groundwater plans for hub cuts and construction extraction	Deferred to plan
LV1, LV4, LV7	Colour palette, screening offers, lighting design to AS/NZS 4282	Deferred to detailed design / plan
GH10	'Consideration will be given to using on-site renewable energy' at camps	Further study
WM4	Waste hierarchy 'will be applied'	Further study
TT19	Access points designed by function	Restates standard
EM1	Hubs designed to ICNIRP magnetic field limits	Deferred to detailed design

> Table B1 - **Appendix F measures and what they commit to**

No measure fixes a camp location, a minimum separation distance, a camp capacity cap, a decommissioning date, an effluent destination, a water source, a hub noise barrier or a batching plant site. None of these measures can be tested at exhibition.

Appendix C
How the Department will test ancillary infrastructure

DPHI's assessment report will deal with ancillary infrastructure in three places: the project description (is the project defined well enough to approve?), the issue chapters (noise, traffic, social, water), and the conditions (can what is unresolved be fixed by a plan 'to the satisfaction of the Planning Secretary'?). The table sets out the tests the Department applies and where the EIS fails them.

DPHI test	Source of the test	Where the NE REZ EIS stands
Is every component located and described (SEARs General Requirements, project description; Reg s 192(1)(d)(i))?	SSI Guidelines; Transmission Guideline	Camp 3 and Camp 1 Alternate not located; further ancillary sites anywhere in the project area; batching and crushing plants unlocated; auxiliary power routes excluded
Has each ancillary site been assessed, or does the EIS rely on a post-approval protocol?	DPHI conditions on linear SSI, e.g. M12 Motorway (SSI 9364) conditions A15–A16: an ancillary facility not identified in the EIS may be used only if not adjacent to a sensitive receiver without written acceptance, with no heritage or biodiversity impact beyond that approved, and under a Site Establishment Management Plan endorsed by the Environmental Representative and approved by the Planning Secretary; CWO condition C8 (final layout plans)	The 'location assessment protocol' has no fixed criteria and no independent sign-off; the EIS itself says ancillary sites 'require additional assessment, siting and mitigation'
Can the camps be conditioned as the CWO camps were (capacity per camp, utilities to council standards, decommissioning deadline)?	CWO Consolidated Approval B52–B57	Capacity is stated; utilities, effluent and waste routes are not; no council has confirmed capacity; no decommissioning timeframe
Does the SIA's housing conclusion survive if the camps are late or undersized?	SIA Guideline (2023): significance of residual impacts; responses must be 'tangible, deliverable, likely to be durably effective' (Appendix C, Q19)	The conclusion rests on the camps; the SIA concedes effectiveness 'will depend on… camp occupancy rates'; the only measure is a Workforce Management Plan (SO4)
Are the intersections serving hubs and camps shown to work (SISD, turn warrants, swept paths)?	TfNSW practice (as applied on CWO)	'Conceptual' treatments; Camp 1 Alternate access on the New England Highway unassessed; OSOM 'last mile' subject to NHVR
Is operational hub noise compliant without reliance on uncommitted design?	Noise Policy for Industry	Compliance assumes 4 m barriers not in Appendix F; NV10 says noise 'will be reviewed during detailed design'
Are the camps safe from bushfire and evacuable?	Planning for Bush Fire Protection 2019 (SFPP)	APZs calculated for four camps; Camp 3 unknown; evacuation routes not assessed; RFS concurrence not shown
Are water sources confirmed and lawful?	DCCEEW Water advice; Aquifer Interference Policy; WM Act	No source confirmed; public-authority exemption claimed; new harvestable-rights dams on acquired land unassessed
Is the land acquisition proportionate and justified?	Just Terms Act; Land Acquisition Guide; property impact assessment	780 ha for 320 beds, 165 ha and 210 ha laydowns, with no explanation

> Table C1 - **Department tests and the NE REZ EIS**

Appendix D
Central-West Orana comparison in full

EnergyCo's Central-West Orana REZ Transmission project (SSI-48323210) is the only direct precedent for how EnergyCo describes camps, hubs and laydowns and how DPHI conditions them. Sources are the CWO EIS fact sheet, the CWO EIS main report (PDF pages, printed chapter page in brackets), the Submissions Report (December 2024) and the Consolidated Approval.

Element	CWO	NE REZ	Comment
Camps	Two: Merotherie Road, Merotherie, 'up to 1,200 workers', adjacent to the Merotherie Energy Hub and main compound; Neeleys Lane, Turill (Cassilis), 'up to 600 workers'	Five: 320 / 320 / 320 / 550 / 550	CWO camps were named, sited and co-located with the main compound and hub; NE REZ has one camp unlocated and one alternate
Camp capacity vs workforce	camps for 'up to 1,800 workers at peak'	capacity for about 2,060 against ~1,400 peak on site at any one time	NE REZ capacity exceeds its stated peak on-site workforce; neither EIS explains the ratio
Site selection criteria stated	'minimising the number of camps… minimising travel time… avoiding the need for compulsory acquisition of land where possible, ensuring suitable access to the road network, minimising clearing by using land that has already been disturbed' (Submissions Report p. 432)	'selected on existing agricultural land that contain cleared and previously disturbed areas'; travel time 'around 45 minutes' (EIS-02 PDF pp. 145, 147)	CWO avoided compulsory acquisition for camps; NE REZ lists 1,080 ha of full freehold acquisition for Camps 1 and 2
Compounds	Four, named: Merotherie hub, Elong Elong hub, New Wollar switching station, Neeleys Lane; later a compound added at Neeleys Lane camp as an amendment with its own traffic appendix	Two named laydowns in Table 3.5; three more in technical reports; others anywhere in the project area by protocol	CWO treated a new compound as an amendment to be assessed; NE REZ treats new sites as a CEMP matter
Enabling crews housed locally	'around 100 construction workers… four to six months', using 'existing local hotel, motel and rental accommodation' (pp. 389, 432, 465)	40 per camp, 200 total, six months (TR04 p. 162)	Same approach; NE REZ's smallest towns bear a larger share (71 per cent of rooms near Camp 2)
Camp facilities	demountables, catering, laundry, first aid and medical practitioners, sports fields, cinema, wastewater treatment plant, CCTV, dark-sky lighting to the Siding Spring guideline (p. 389–390)	demountables, catering, gym, first aid and on-site practitioners, helipad, laydown, WWTP, diesel generators, solar (PDF p. 147)	Comparable, except NE REZ adds a helipad at every camp
Upgrade or shared use	'Any future upgrades or augmentation… that are not consistent with the planning approval would be considered a project modification' (p. 53)	Silent	A commitment EnergyCo gave at CWO and has not given here

Power	'likely… a connection to the Essential Energy distribution network', generators where impracticable (p. 53)	Auxiliary routes 'have not been assessed as part of this EIS' (PDF p. 118)	At CWO the answer was given in the Submissions Report; here it is deferred to an Amendment Report or later
Legacy	'would not be suitable for conversion to permanent housing' (p. 432); councils' preference for town-adjacent camps 'noted'	'outside the scope of the project' (TR04 p. 160)	Same position; councils objected both times

> Table D1 - **How EnergyCo described the ancillary infrastructure at CWO and at NE REZ**

Matter	CWO EIS (2023)	NE REZ EIS (2026)
Camp site and size	'The workforce accommodation camp site is about 41 hectares in size and would accommodate up to 1,200 people', 'next to the Merotherie Energy Hub main construction compound, about six kilometres south of the intersection of Merotherie Road with the Golden Highway' (PDF p. 172 [3-60]); satellite camp 'at 118 Neeleys Lane, Turill… up to 600 people' (p. 173 [3-61])	Camp 2: 'Camp 2 – Full – 780' ha, '~320 workers'; no address, no camp footprint (PDF pp. 138, 146)
Hub sizes	'The energy hubs at Merotherie and Elong Elong would occupy an area of around 200 hectares and 75 hectares respectively, inclusive of the required APZ buffers'; New Wollar Switching Station 'around 35 hectares (inclusive of the required bushfire asset protection zone (APZ) buffer and access road)' (p. 131 [3-19])	Acquisition areas of 35–335 ha that 'should not be equated to the size of the infrastructure' (p. 138)
Compounds	Three named compounds at the two hubs and the switching station, each with a listed inventory including batching plant, cement silo, crushing plant, helipad and refuelling, testing laboratory, WWTP (pp. 147, 166–167 [3-35, 3-54–3-55]); crushing, grinding and screening 'would be located at the New Wollar Switching Station, Merotherie Energy Hub and Elong Elong Energy Hub construction compounds' (p. 166)	Batching, crushing and screening plants 'may be located at suitable sites anywhere within the project area' (p. 171)
Criteria for additional sites	'Alternative or additional sites (if required outside the construction area) may be added, and would be subject to further assessment and approval'; criteria include 'separated from the nearest residences by at least 200 metres, unless feasible and reasonable noise and light spill mitigation measures are implemented', 'above the 20 year average recurrence interval flood level', 'not requiring native vegetation clearing beyond that already required' (p. 171 [3-59])	'separation distances from sensitive receivers' (no distance); 'avoidance of flood prone land where practicable'; 'minimisation of vegetation clearing'; confirmed 'during detailed design and documented in the CEMP' (p. 172)
Potable water source	'sourced from council owned potable water supplies in Dunedoo and Coolah… and Gulgong where possible' (p. 177 [3-65])	'sourced from existing water supplies or purchased via vendor'; 'EnergyCo has engaged with councils, AGL and WaterNSW' (pp. 101, 173)
Groundwater	'Two new bores would be established, one at each of the energy hubs at Elong Elong and Merotherie… Around 125 megalitres of groundwater would be taken over the construction period from each' named source 'under water access licences for the project' (p. 177)	Groundwater listed as a source; public-authority exemption from water access licences claimed (p. 174); no bore, volume or source named

Camp wastewater	WWTP designed to AS/NZS 1547 and the Australian Guidelines for Water Recycling; 'up to 240 litres of water would be used per day, per person'; 'an EPL for sewage treatment… is not anticipated to be required'; establishment-phase wastewater 'transported to a council wastewater treatment plant'; sludge to a licensed facility (pp. 177–178 [3-65–3-66])	'Wastewater treatment plants are proposed at workforce accommodation camps… Remaining wastewater or waste from treatment plants would be disposed of at a licenced wastewater facility' (p. 101); no design basis, standard, per-capita figure or receiving facility
Camp power	'connection of the construction site offices and workforce accommodation camps to the local power grid'; annual demand stated (p. 178 [3-66])	Grid, 'alternative' or diesel; routes 'have not been assessed as part of this EIS' (p. 118)
Interim camps	'Interim workforce accommodation camps… would be located within the same areas identified for the construction compounds and final workforce accommodation camps', with generators, toilets and water trucks (p. 154 [3-42])	Enabling crews of 40 per camp in local motels for six months (TR04 p. 162)
Construction area	'Around 4,000 hectares comprising the area that would be directly impacted by the construction of the project, including… workforce accommodation camps, construction compounds, brake and winch sites and laydown and staging areas' (p. 146 [3-34])	Disturbance footprint 3,579 ha inside a 10,928 ha project area within which sites can move (pp. 100–101, 109)
Peak workforce vs camp capacity	'up to around 1,800 personnel' (p. 146); camps 'for up to around 1,800 staff' (p. 147)	~1,400 personnel on site at any one time; capacity for about 2,060 (pp. 102, 143, 146)

> Table D2 - **What the CWO EIS project description said, page for page, that the NE REZ EIS does not say**

The CWO description is not a model of precision, and the community there objected to much of it. But every row above is a matter EnergyCo was able to state two years ago and has not stated now, for a project with more than twice as many camps on a line nearly twice as long.

What councils and agencies asked for at CWO (Submissions Report)

- Mid-Western Regional Council: construction program, camp layouts and recreation, lighting levels, dry or wet camp, firefighting and medical facilities, a decommissioning condition with a date, a condition confining the camp to this project, the number of workers using local accommodation, and where the camp-builders would stay (pp. 389–390). All answered, if briefly.
- Dubbo Regional Council: camps within or next to towns for legacy housing; mechanisms to ensure the contractor actually delivers the camps on time; the 1,800 figure 'does not include ancillary and other workers' (p. 432).
- Upper Hunter Shire Council: 'a detailed accommodation strategy which addresses community concerns and outlines the methodology for construction and operation of the camps' (p. 465).
- Transport for NSW: camp traffic volumes by vehicle class, servicing traffic, construction-of-camp traffic, origin–destination survey, staging, SISD compliance at the Golden Highway intersections at 300 m, turn warrants, strategic designs with swept paths (pp. 529–530). EnergyCo answered with a new traffic appendix to the Amendment Report.

The same councils (Upper Hunter Shire among them) and the same agencies will assess the NE REZ EIS. The questions they asked at CWO are the questions this EIS leaves unanswered.

Condition	Requirement	NE REZ equivalent in the EIS
B52	Camps constructed and operated 'as described in the EIS' and Appendix 1, following the staging in B53	Impossible for Camp 3 and Camp 1 Alternate, which the EIS does not describe
B53	Accommodation Camp Management Plan approved by the Planning Secretary before camp construction: utilities designed to council and relevant standards; treated wastewater reuse to irrigation and public-health standards; dust; 'quantify the proposed capacity of workers accommodated at each accommodation camp'; layout, access and servicing; local suppliers; worker health and on-site medical	Partly anticipated by SO4 (Workforce Management Plan) but with no utilities, capacity or servicing content
B56	Camps decommissioned and rehabilitated within 12 months of operations commencing; infrastructure removed to 500 mm depth	No timeframe
B57	Ancillary facilities and earthworks material sites rehabilitated within 6 months of the end of their use	No timeframe
B7	Where camps or compounds are expected to exceed construction noise or sleep disturbance criteria, mitigation in place before those activities start	Six sleep-disturbance exceedances accepted; mitigation is 'judicious placement'
B18	Water management systems at substations, batching plants, compounds and camps designed to prevent pollution	Batching plant locations unknown
B45	20,000 L water tank with 65 mm Storz fitting at every compound; buildings to AS 3959; APZs within the approved disturbance area	APZs calculated, Camp 3 excepted
B46	Emergency Plan including camp evacuation before construction	BF6 (plan to come)
B54, B55	Local Business and Employment Strategy; Social Impact Management Plan addressing housing availability and affordability and labour draw	SO1–SO4 (plans to come)
C8	Final Layout Plans showing 'siting of transmission towers and ancillary infrastructure and / or ancillary facilities' with a comparison to the approved layout, before construction	Nothing comparable is offered; the location assessment protocol would operate inside the CEMP

> Table D3 - **How DPHI conditioned CWO (Consolidated Approval)**

What carries over to the NE REZ submission

1. CWO proves that a camp can be named, sited and assessed in an EIS and conditioned to a capacity and a decommissioning date. The NE REZ EIS's failure to do so for Camp 3 and Camp 1 Alternate is a choice, not a limitation of the process.
2. The CWO approval's B52 ('as described in the EIS') is the standard condition DPHI will reach for. It cannot be imposed on a camp the EIS does not describe. The remedy is to require the Amendment Report to be exhibited, and to confine the approval to the exhibited sites.

3. TfNSW's CWO requests (SISD, turn warrants, swept paths, origin–destination, staging) give councils a ready-made list for the Camp 2 (Gundy Road/Waverley Road), Camp 3 (Nundle Road/Barry Road), Central Hub A (New England Highway) and Central South Hub (Oxley Highway) accesses.
4. EnergyCo's CWO commitment that augmentation or use of camps for other projects would be 'a project modification' should be required as a condition here, given that camp capacity exceeds the stated peak on-site workforce.
5. Dubbo's point that the headcount excludes subcontractors and ancillary workers was never answered with numbers at CWO; it should be asked with numbers here.

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha