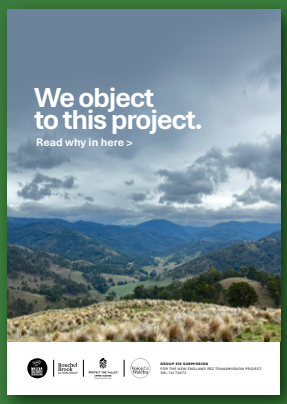
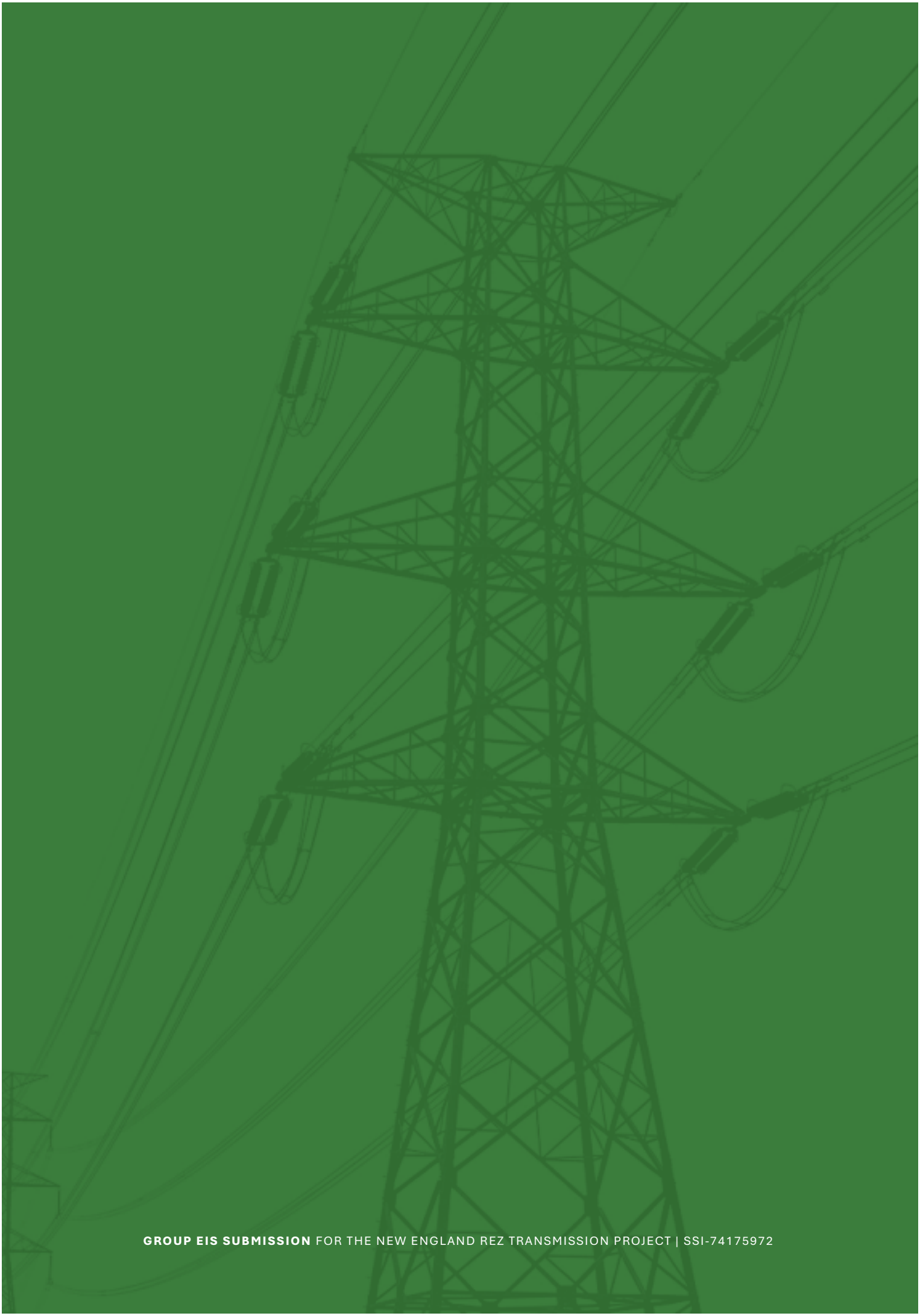
SECTION **2**

The Risks of an Incomplete EIS

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 2

The Risks of an Incomplete EIS

Key issues we have found ...



Promises are not protection

CWO heritage destruction and missed social targets show why written commitments need independently verified implementation, clear accountability and enforceable consequences.



Essential assessment cannot be deferred

Water supplies, access, camps and safeguards remain unresolved, preventing communities from testing impacts and whether proposed protections are actually achievable.



Closed complaints can leave problems

CWO correspondence records complaints closed despite continuing disagreement, showing why communities need independent remedies with authority to secure corrective action.



Shared impacts need coordinated decisions

Separate project assessments leave shared water, roads, housing and services without demonstrated capacity, coordinated decisions or funded responses to demand.



Exhibited maps are already outdated

EnergyCo acknowledges design changes missing from exhibited maps, leaving landholders unable to assess revised alignments, access tracks and associated impacts.



Complete assessment before granting approval

Resolve material gaps, publish the updated design and exhibit revised assessments before determination, with enforceable limits and independently verified safeguards.

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

Read in more detail >



> View to Glenbawn Dam from Gundy M. Tuscaloosa - Lines will be directly in front

SECTION **2**

The risks of an incomplete EIS

EXECUTIVE SUMMARY

Our community asks the decision maker to resolve material questions about project feasibility, impacts and protection before approval.

The New England REZ EIS repeatedly defers details, designs, plans and information until after determination. Those commitments do not demonstrate that mitigation will work or that the community will be protected.

These deferrals are documented in Appendix 01 – Deferred Detail Evidence Register – contained as part of this report.

The Central West Orana Renewable Energy Zone provides evidence of how such protective systems have operated in practice. Its record includes an admitted failure to implement heritage protection, missed social management targets, complaint closure despite continuing disagreement, and parliamentary findings of inadequate cumulative coordination and community remedies. Together, these examples demonstrate weaknesses in the assumption that delaying the timing for approved plans and later processes will reliably deliver the outcomes promised during assessment. [CWO01–CWO07; S02, Findings 3, 6–8, 11–12 and 17–19]

The EIS should not have been exhibited without the information needed to assess impacts, test mitigation or establish access to essential supplies and services. The community cannot properly assess choices that may change the project's footprint, resource demand or impacts when those choices remain unresolved. Sections 8–10 examine water and servicing deferrals. Section 11 shows that some exhibited maps were already out of date.

Notably, we are not asking for Energy Co to have every engineering detail completed before approval. What we are asking for is Energy Co to identify and rectify **major unresolved matters** that determine the **impacts** on the communities, industries and the landscape that are hosting the project, and ask that those matters be resolved **before** the project is determined.

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1 | What the evidence demonstrates

Three distinctions are central.

1. A protection written into a plan is not evidence that it has been implemented effectively.
2. Completion of consultation or a complaint process is not evidence that the substantive issue has been resolved.
3. Assessment of an individual project does not establish that shared water, roads or services can accommodate the combined development program.

The case studies and comparative table document these gaps and identify what the New England REZ project needs to demonstrate before approval.

Unresolved resources, mitigation or infrastructure may force redesign, additional works, changed sourcing or rescheduling after approval. These risks affect the community, environment, cost and delivery timetable.

Decision requested

Complete the material assessment, publish the findings and re-exhibit material new information with adequate time for response before determination. Approval must be limited to a scale supported by demonstrated capacity and feasible, funded mitigation. Conditions must secure and verify those protections.

Urgency does not justify curtailed scrutiny. Approving a project without establishing resource availability increases the risk of delays and failure to deliver.

2 | How deferred decisions can leave the community without protection

The concern is a sequence of decisions. At exhibition, a material question is answered by a commitment to later work. Approval then establishes the project's principal direction while the answer remains outstanding. When design or supply decisions finally emerge, affected people may have to pursue changes through implementation consultation, referrals or complaints. Those processes may have narrower powers or less practical scope to change the outcome. CWO - CASE STUDY 03–CWO - CASE STUDY 07 provide evidence of those limitations; CWO - CASE STUDY 01 shows why a remedy after irreversible loss can be inadequate.

These cases expose different weaknesses in implementation, assessment, remedies and coordination. Together, they show why a promised later process must be tested for effectiveness.

The distinction between later engineering and missing assessment

Detailed engineering can properly refine a project after assessment. Our objection concerns information that could change whether the project is feasible, whether its impacts are acceptable or which mitigation is necessary. The assessment needs a sufficiently defined project, credible limits on its impacts and evidence that the proposed protections can be delivered. A future design exercise should operate within those demonstrated limits.

For example, selecting equipment within an assessed and achievable capacity range is different from establishing later whether a sufficient water source exists. A commitment to apply for an approval also leaves open whether the proposed activity is permissible and what additional works or controls it may require. Where those answers could materially change impacts, they need to inform the assessment and public response before determination.

What we mean by a failure of process

Process failures include unmet protective commitments, unresolved material assessment questions, consultation without effective influence, and remedies that end without addressing the concern. Section 3 and the case entries distinguish admitted failures and official findings from reported concerns and inferred risks. A disputed outcome is not, by itself, proof of a consent breach.

Scope of this section

Sections 1–2 explain the risks of deferred decisions. Sections 3–4 set out the CWO approval obligations and compare SIMP promises with parliamentary findings. Sections 5–7 present seven CWO case studies. Sections 8–10 apply those lessons to New England water and servicing deferrals. Section 11 documents design changes omitted from the exhibited EIS. Sections 12–13 set out the response sought and concluding position. Section 14 contains the source register.

Case identifiers and source pinpoints remain fixed for citation, for example: “See Section 2, CWO - CASE STUDY 04, and S08, Council response of 20 December 2024, answers 16.1–16.3, p 99.” The comparative table is in section 4.

Proposed safeguards are our submission requests, not statements that they already apply to New England.

3 | Evidence standards and approval obligations

Three categories must remain distinct:

- an admitted implementation failure;
- an official finding or monitoring result; and
- an allegation or unresolved dispute.

Parliamentary findings are authoritative findings of the committee, but do not themselves adjudicate an individual consent breach. A missed satisfaction target also does not automatically prove a statutory offence.

Relevant determination conditions

The following are obligations in the consolidated CWO approval, last modified on 2 December 2025. The original approval was dated 26 June 2024. Printed page numbers below refer to the consolidated version; its physical PDF page number is three higher. [S01; source register, section 14]

Condition	Requirement relevant to this submission	Printed page
A7 and A17	For consultation required by conditions, record outcomes, unresolved issues and how disagreements were addressed; instruct employees and contractors to comply with relevant conditions.	6 and 8
A21 and A22	Implement a Community Communication Strategy, including arrangements to respond to and resolve issues and mediate construction disputes.	8
B15	Ensure sufficient water for every development stage; adjust the scale to available supply if necessary. Obtain required water licences before extraction or interception, unless exempt.	11
B27 and B28	Protect heritage items in accordance with the approval and implement the approved Heritage Management Plan.	14
B35	Prepare and implement traffic management addressing relevant cumulative movements, school buses and complaints.	15–16
B55	Implement the SIMP, including cumulative social impacts, performance triggers, annual independent community survey, baseline comparison, complaints, adaptive action and quarterly public reporting.	20
C10 to C17	Notify incidents and noncompliances as required; undertake independent audits and publish required plans, monitoring, monthly complaint records and audit material.	23–24

Which versions are compared

The June 2025 SIMP (Social Impact Management Plan) summary establishes public assurances at that date, after the June 2024 approval. The currently published full SIMP is Revision 5, dated December 2025 and authorised in January 2026, (despite “oct-2025”) appearing in its filename. Its Appendix E reproduces EIS and amendment commitments, including complaint handling. Later revisions are not treated as promises already in force during earlier complaints. [S03–S04]

The first inquiry report of August 2025 focused on CWO. The July 2026 final report considered the wider REZ program.

Its findings about systemic weaknesses are distinguished from individual CWO events. The government response to the final report was due on 29 October 2026, after the 21 October cutoff for this CWO evidence review. [S02]

> Reference for all inquiry reports, and the Government response: https://www.parliament.nsw.gov.au/parliamentary-business/committees/inquiry-details?committeeInquiryId=3065

4 | SIMP promises compared with inquiry findings

This table compares like subjects rather than implying that the inquiry audited each SIMP (Social Impact Management Plan) clause. The final report findings are adopted findings, not proposed amendments appearing in the meeting minutes. Source S02 is Report 65 unless Report 62 is expressly identified.

SIMP promise and approval anchor	Parliamentary finding	Requirement sought for New England
Meaningful participation Feedback into plans; timely information. SIMP pp 88–90; summary pp 16, 19. A21–A22. [S03–S04]	Findings 11–12, p 62: consultation sometimes procedural, without meaningful influence; fragmented engagement and information asymmetry.	Participation must offer a genuine opportunity to influence decisions. CWO - CASE STUDY 03 illustrates the gap. Require timely design disclosure, reasoned responses to alternatives, and a record of changes or reasons for rejection.
Effective remedies Record, respond and escalate complaints. SIMP Appendix E, SI7, p 164. A22 and B55. [S04]	Findings 17–19, p 67: EWON arrangements insufficient for systemic REZ disputes; proactive protections lacking.	A closed complaint does not establish remedy. See CWO - CASE STUDY 03, CWO - CASE STUDY 04 and CWO - CASE STUDY 07. Require independent escalation, reasons, deadlines and authority to secure corrective action.
Cumulative protection Manage project effects; refer wider issues to regional coordination. Summary pp 6, 12. B55. [S03]	Findings 3, 6–7, pp 56–58: no coherent enforceable framework; essential services need coordination; EnergyCo failed its central coordinating role.	CWO - CASE STUDY 05 shows shared-resource risks across project boundaries. Require a published cumulative capacity assessment, an accountable agency, funded mitigation and enforceable sequencing before approval.
Monitoring and adaptation Annual survey, quarterly reporting and review. SIMP pp 90–93. B55. [S04]	Finding 16, p 65: inconsistent social assessment. Recommendation 3, p 58: public mitigation reporting and independent audit.	CWO - CASE STUDY 02 tests actual outcomes. Require comparable baselines, disclosure of missed targets and an independently reviewed corrective program with dates and owners.
Road access and safety Notification and traffic coordination. Summary p 13. B35 and B55. [S03]	Findings 6–8, pp 57–59: shared road and service pressures; inadequate coordination and council resources.	CWO - CASE STUDY 06 concerns coordination across projects. Require combined schedules, protected school and essential-service access, and an authority able to resolve conflicting movements.
Heritage protection Implement the plan, train staff and consult. Summary p 17. B27–B28. [S03]	Finding 16, p 65: intangible social impacts. Recommendation 15, p 110: earlier Aboriginal participation and resources; no site-specific breach finding.	CWO - CASE STUDY 01 provides event evidence. Require verified protection before disturbance, contractor accountability and effective holds on works that risk irreversible harm.
Housing and services Camps, dedicated services and regional coordination. Summary pp 12, 14–15. B55. [S03]	Findings 6–8, pp 57–59: housing, water and service pressures; councils lack adequate authority and resources.	Camps relocate demand without proving spare capacity. Require provider-confirmed cumulative capacity and funded infrastructure. Purchasing or storage arrangements alone do not establish source reliability.
Delivery accountability Assigned responsibilities and public review. SIMP pp 91–95. B55 and C17. [S04]	Findings 24–25, p 111: first-report response lacks clear reform and accountability. Recommendation 16: an implementation plan.	Require an obligation register with owners, dates and independent verification. The criticism concerns follow-through on the first report; the final-report response was not overdue at the 21 October 2026 evidence cutoff.

5 | Evidence of implementation and monitoring failures

CWO - CASE STUDY 01
Known Aboriginal heritage protection failed

Evidence status Admitted implementation failure and irreversible loss; a site-specific statutory breach determination is a separate question.

The promised framework included implementation of the Heritage Management Plan, staff training and Aboriginal consultation. The approval requires heritage protection and implementation of the approved plan; contractor obligations also matter. [S01, B27–B28 and A17; S03, p 17]

ACEREZ's public statements of 25 May and 23 June 2026 acknowledged that protection processes had not been fully implemented and that internal design and construction failures contributed to the destruction of a rock shelter. It reported stronger controls following its internal investigation and engagement with the planning department. [S06]

ABC's 23 June report identifies destruction during March clearing, discovery in May, and the shelter's previously known protected status. It also records a Traditional Owner representative's account of repeated protection assurances. ACEREZ described additional design and buffer checks, site inspections with Aboriginal representatives, machinery exclusion areas and clearer marking before staged work resumed. [S07]

This event supports a precise conclusion: the system described in the plans did not prevent the admitted loss. It does not, without the site record and regulator's determination, identify the exact condition subclause contravened or establish a prosecution outcome. The separate federal conclusion about bird and habitat clearing mentioned in the ABC article must not be read as exoneration of this heritage incident.

> POSITION SOUGHT

Require the proponent to demonstrate how protective commitments are translated into surveyed constraints, design checks, contractor instructions and independent verification before disturbance. For irreversible impacts, later reporting is not an adequate substitute for prevention. Request the incident investigation, regulator's response and corrective-action verification as relevant CWO lessons.

Why this matters beyond heritage

The relevance to New England extends to any safeguard that must work in the field. The assessment should explain how material constraints shape the design and how the protection will be verified before disturbance. It should identify responsibility, early detection and the consequence of exceeding an approved limit. This case establishes an implementation failure; it does not establish that deferring the EIS design caused that loss. The approval must specify how contractor compliance will be verified and the consequences of breaches.

Press and public advocacy corroboration

The 3 December 2025 ABC report records Mid-Western Regional Council's unsuccessful advocacy for a Merotherie Road alternative through cleared land, while EnergyCo and ACEREZ defended consultation and engineering requirements. This supports scrutiny of how alternatives were available, and not fully explored. [S16]

Public social-media advocacy identified the same heritage and clearing issues. We rely on the admissions, official correspondence and identified reporting for factual propositions. The social links in S26 provide context and a route to original public advocacy.

CWO - CASE STUDY 02

Published SIMP results do not establish effective protection

Evidence status Proponent-published monitoring results; missed performance targets and limitations in comparison, not automatically legal breaches.

The August 2026 community-survey summary reports 400 participants surveyed in April–May, with seven indicators on target, four behind target and two not comparable. [S05, p 1]

Indicator	Baseline	2026 result	Published status
Satisfaction with social-impact management	9%	12%	Below target
Satisfaction with lodging queries or complaints and receiving a response	9%	10%	Below target
Satisfaction with access to project information	11%	20%	Below target
Positive biosecurity rating among agricultural landowners	45%	31%	Below target

> Source S05, pp 3–4. The table uses EnergyCo's target classification. It does not reinterpret the plan's percentage-change wording. [S05, p 2]

The adaptive response is the next accountability test

D-01's response to unmet targets includes process review, identifying gaps and independent review. The issue for assessment is whether those steps produce a published, accountable corrective program, with a date by which its effectiveness can be tested. The full SIMP provides for ongoing review and reporting. [S04, pp 90–93]

Publishing survey results does not, by itself, demonstrate effective protection. The test is whether identified weaknesses change management, responsibility and, where necessary, construction activity.

A baseline must permit the promised comparison

The survey summary identifies no agricultural-impact baseline and a changed road-safety question that prevents comparison. These limits matter when interpreting whether impacts are improving. [S05, p 5]

In New England, our community requires stable definitions and a documented baseline for each material impact before work begins. If a measure changes, both the old and new basis should be reported with an explanation. A general satisfaction score should complement measurable environmental and service outcomes; it should not replace them.

> POSITION SOUGHT

Require publication of the independent review and corrective response triggered by missed targets, with action owners, deadlines and evidence of completion. For New England, establish comparable baselines before approval and binding escalation where monitoring shows worsening impacts. Do not treat a low response-satisfaction result as proof that no complaint channel exists.
Affected neighbours may be a small share of the surveyed population. Reporting must identify their experience separately so that broad community averages do not obscure severe local impacts.

6 | Official correspondence and the limits of remedy

CWO - CASE STUDY 03

Merotherie Road complaint closure

Evidence status Original correspondence published by Parliament. It records investigation and closure, alongside continued disagreement.

A ministerial adviser referred Bowman to EWON (Energy and Water Ombudsman NSW) on 30 January 2025. On 26 February EWON closed the EnergyCo complaint, finding planning/EIS obligations fulfilled while acknowledging absent road-design visuals. It closed the ACEREZ complaint on 8 April and requested further reasons. ACEREZ supplied engineering reasons on 15 April; Bowman sought the underlying assessment on 23 April. By 4 June she still expressed dissatisfaction; ACEREZ was arranging a CEO meeting. [S08, pp 52, 35, 50–51, 27–28, 31–32]

> POSITION SOUGHT

A procedural compliance finding does not recreate the opportunity to scrutinise design and alternatives before determination. Require material design information during assessment, reasons addressing substantive objections and an effective opportunity to respond before irreversible work. Later remedy must include access to the underlying information and independent escalation within a stated time.
The correspondence does not record an EWON breach finding.

CWO - CASE STUDY 04

Water questions followed by council closure

Evidence status Original Warrumbungle Shire Council response concerning separately approved Lawson Park Road Solar. This is a regional comparator, not a transmission-condition case.

Council's 20 December 2024 response supplied no numerical "low" demand volume and acknowledged no district/CWO cumulative water balance, yet considered six-month construction demand negligible. On 11 March 2025 its General Manager declined further commentary after determination and referred Bowman to the panel or court. [S08, pp 90, 99, answers 16.1–16.3; p 83].

These unanswered questions show why water demand and sources must be quantified before determination.

> POSITION SOUGHT

This is the clearest comparator for the risk of unresolved resource questions passing beyond determination. Require a quantified cumulative water assessment while the community can influence the decision, with an identified authority responsible for answering substantive objections. A description of an individual demand as small does not demonstrate regional spare capacity. Our community should not have to reconstruct that evidence after approval.

CWO - CASE STUDY 07

Independent complaint coverage remains incomplete

EWON's 1 May 2026 evidence reports 76 renewable-infrastructure complaints finalised from 1 December 2024 to 31 March 2026; 22 concerned generation or storage developers outside its jurisdiction and received information or referrals. These are statewide figures. They neither identify 22 CWO cases nor show that all remained unresolved. [S14, answers 4–6, printed pp 4–5]

EWON has binding powers within its existing jurisdiction. Its current webpage identifies the transmission entities it covers, including EnergyCo and ACEREZ, and says extending coverage to generation and storage is being explored. Its 2025–26 annual report also describes continuing work on that expansion. [S15, webpage and report pp 27–30]

Position sought Require an accessible route with authority over the actual parties and issue, including shared impacts across projects. Recommendations 11–12 and Findings 17–19 of the final inquiry support stronger advocacy and systemic remedies. The existence of a transmission complaint pathway does not answer every regional dispute. [S02, pp 66–67]

7 | Cumulative planning and continuing community concerns

CWO - CASE STUDY 05

Formal council evidence of consultation without decisions

Mid-Western Regional Council General Manager Brad Cam's supplementary answers, received 16 June 2025, describe a water, sewer, waste, health, emergency-service and roads committee without accountable decisions and funding. He reports consultation without action and meetings involving representatives without sufficient authority. [S09, questions 21, 25, 28–30, pp 5–7]

The final inquiry subsequently found that EnergyCo had failed its central coordinating role and that councils lacked adequate authority and resources. Those findings give the council evidence wider institutional significance. [S02, Findings 7–8, pp 58–59]

Regional studies were published in December 2025. The government's response to the first inquiry report relied on studies and other existing initiatives. The final committee nevertheless criticised the studies' adequacy, emphasis on opportunities rather than solutions, and the lack of clear reform and implementation accountability. [S02, pp 52–57 and 111; S17]

> POSITION SOUGHT

Require a regional decision and delivery framework that identifies capacity limits, cumulative project demand, funded responses and the agency responsible for acting. Consultation committees should have a defined escalation route to a decision maker, not merely a reporting function.

CWO - CASE STUDY 06

Transport impacts reported despite closure of an information action

The 5 May 2026 CRG minutes record Jane Hegarty recalling advice that oversized deliveries would avoid school hours and questioning Uungula's delivery schedule. EnergyCo undertook to follow-up. [S11, p 5]

The 11 August minutes mark that follow-up closed after a schedule and complaint contact were provided. They also record reported school-run delays of 20–30 minutes and a mayor's report of a missed medical appointment following a transport delay, with new actions raised. Road-maintenance concerns involving ACEREZ vehicles were also recorded. [S12, pp 3, 6, 8–9]

The assurance is a participant's recorded recollection; the delays are reports in official minutes. Uungula is a separate generation project. This is evidence of a shared-impact problem and the limits of closing an information action, not a determined breach of transmission condition B35.

> POSITION SOUGHT

Require combined transport planning that protects essential access and identifies who can change conflicting project schedules. Publish the distinction between an information response, a completed corrective action and an impact that remains unresolved.

Contemporary evidence of unresolved institutional demands

Dubbo Regional Council's September 2026 meeting outcomes record resolutions seeking stronger benefits transparency, additional council funding and longer EIS exhibitions. These establish continuing institutional concern. [S13]

Ministerial answers of 29 October 2025 listed construction-water source categories and commercial arrangements without the requested licence particulars. They also confirmed that formal minutes had not been kept for specified early meetings. These are specific transparency gaps. [S10, questions 9–11]

8 | The water volumes dispute in New England

Our dispute concerns whether forecast demand can be met from particular sources without unacceptable effects on existing users and the environment. A project demand estimate, a regional licence total, water in an allocation account, and reliable physical supply are different quantities. They cannot be substituted for each other.

The figures that should be used

Quantity and scope	Verified amount	What it establishes
New England network construction demand	2,400 ML total 360 ML potable 2,040 ML non-potable	An estimated project requirement, not a secured allocation or demonstrated source capacity. [S18, p 85; S19, p 5]
Macleay non-potable demand attributed in the network assessment	534.1 ML total 152.8 ML peak annual	Demand associated with the assessment's geographic allocation assumptions; final supply is deferred to detailed design. [S18, pp 86–87, Table 4.3]
Macleay licensed allocation denominator	1,796 ML for 2026–27 152.8 ÷ 1,796 = 8.51%	The report rounds the demand ratio to about 9%. The denominator is regional licence holders' allocation, not water secured by EnergyCo. [S18, pp 82, 87]
October 2026 regional model including network and generation or storage	7,318 ML across 2027–35 1,913 ML potable 5,405 ML non-potable	A demand scenario for the regional development program. It does not assess source availability or other users' demand. [S19, p 5]
Projects located in Walcha LGA in that regional model	1,566 ML total 379 ML potable 1,187 ML non-potable	Location of projects, not necessarily the place of water extraction or purchase. [S19, pp 6, 8]
Walcha modelled peak annual demand in 2033	98 + 305 = 403 ML/year About 1.10 ML/day averaged over a year	An annualised average calculated as 403 ÷ 365. It is not a peak-day demand, allocation, or actual extraction. [S19, pp 6, 8]

ML means megalitres; 1 ML is one million litres. Network-only and wider regional totals have different scopes. Total construction, annual and daily figures also have different time bases. A valid comparison must retain both scope and time basis.

Why the October update does not settle availability

The update improves the demand scenario but expressly excludes assessment of water sources, availability and community or other-user demand. It uses a representative program of 35 generation/storage projects plus the network, with sequencing assumptions and pumped hydro excluded. Its reported reduction from earlier maximum potable demand is not a like-for-like reduction in all water requirements. [S19, pp 5, 10–13]

The document also states that each project must demonstrate secure water and assess cumulative impacts before planning approval. Further infrastructure capacity and feasibility work is scheduled through 2026–27, with additional detail in 2027. We ask the decision maker to test the EIS against that stated preapproval standard. [S19, pp 14, 16]

9 | Why allocation ratios do not resolve cumulative risk

The EIS identifies material limits in its availability evidence

Technical Report 14 describes preliminary discussions with councils, water agencies, a power-station operator and a broker. It anticipates a later detailed water strategy. It also states that historical utilisation data for unregulated sources are unavailable, uses regulated-river available-water determinations as a proxy, and identifies no historical available-water determination data for the Macleay and Manning sources. The report distinguishes allocations from actual extraction and notes that harvestable-rights dams may have no water in dry conditions. [S18, pp 81–83]

For the Macleay example, the relevant comparison is 152.8 ML of peak annual network demand against 1,796 ML of annual licensed allocation. The arithmetic is not the problem. The inference from that arithmetic to a secure supply needs additional evidence: how much is already required by existing users; which holders can and will supply the project; the legal and physical limits at the proposed extraction sites; and what remains available when conditions are dry. [S18, pp 82, 87]

The report's use of water-sharing-plan geography and nearest-camp assumptions is an assessment device. It does not identify a final source portfolio.

Its acknowledgement that drought can increase dust-suppression demand makes the timing issue more significant: available supply may decline while construction demand increases. [S18, pp 86–87]

The direct connection to the CWO record

CWO - CASE STUDY 04 is the closest factual comparator: it concerns whether a small individual demand can be called acceptable without the cumulative balance that would support that conclusion. Findings 6–8 of the final inquiry explain why separate consents and later coordination are insufficient for shared services and resources. New England's demand update leaves the availability side of that calculation outside its scope.

These records support the same assessment question: where is the integrated, source-specific evidence that the combined demand can be supplied? [S02, pp 57–59; S18–S19]

The May 2025 CWO water study makes the same distinction: aggregate entitlements exceed estimated demand, but willing sellers, market constraints and drought affect access. It also identifies limited utility spare capacity. Many EISs lacked adequate water information; sixteen had sufficient data, with assumptions filling other gaps. [S27, pp 7–9, 16]

It supports requiring the proponent to close the gap between forecast demand and demonstrated supply before approval.

Groundwater cannot be assumed to fill the gap

NSW Public Works' 31 July 2026 correspondence describes variable fractured-rock yield, recharge and connectivity, and the difficulty of securing large, reliable supplies along the Great Dividing Range. It provides no sustainable yield for a proposed project bore. Site-specific evidence is therefore essential. [S21]

NSW's water-allocation guidance also distinguishes allocation and licensing processes from the assessment of works and extraction impacts. Water availability can change with inflows and restrictions. Neither a licence purchase nor a nominal account balance removes the need to demonstrate lawful, sustainable and physically deliverable supply at the proposed location. [S20]

> POSITION SOUGHT

Require an independently reviewed cumulative water balance for each proposed and identified groundwater source before approval, covering existing needs, connected projects, seasonal and drought conditions, daily demand and extraction limits. If supply cannot be demonstrated, require a reduced or staged development envelope before approval; do not leave the basic feasibility question to later purchasing arrangements.

10 | What New England leaves to later work

These deferrals in the New England water documents identify information still missing at exhibition. The final column sets out what must be provided before determination.

Deferred matter and source	Why it matters to assessment	Evidence required before approval
Water sources and supply strategy Technical Report 14 describes preliminary discussions, a later detailed strategy and sourcing to be confirmed during detailed design. Some third-party supplies depend on further regulatory approval. [S18, pp 81, 87]	Source choice determines reliability, competing demand, conveyance needs and extraction impacts. A supplier category or regional allocation total does not establish a feasible source portfolio.	Identify sources, lawful volumes, supplier capacity and the evidence of access. Assess drought reliability, delivery works, competing uses and the approvals on which the strategy depends.
Demand during drought The report identifies increased dust-suppression demand during dry periods for consideration during detailed design. [S18, p 87, section 4.4.1.2]	The demand increase may coincide with reduced supply. This can change both the feasibility of construction and the effectiveness of dust mitigation.	Test peak and prolonged dry-period demand against available supply. Demonstrate feasible alternative controls, demand reduction and limits on construction where supply falls short.
Wastewater design and capacity The report proposes on-site treatment where possible, with design and capacity determined during detailed design. Treated water is intended for reuse. [S18, p 87, section 4.5.1]	Treatment performance and capacity affect whether reuse is achievable, how much fresh water is needed, and what storage, disposal and contingency arrangements are required.	Demonstrate a feasible capacity and performance range, treatment and reuse standards, storage and disposal arrangements, associated impacts and a workable contingency.
Regional capacity and funded solutions. The October update excludes availability and other-user demand; water and wastewater investigations continue through 2026–27, with more detail in 2027. [S19, pp 5, 16]	A demand forecast cannot establish spare capacity. Infrastructure responses may require land, approvals, funding and lead time that affect project sequencing.	Publish the cumulative capacity assessment, existing-user requirements, feasible solutions, responsible agencies, funding and delivery dependencies before relying on them as mitigation.

The preapproval standard in the update

The October update itself states that each project, including the network, must demonstrate secure water and assess cumulative impacts before planning approval. It identifies several responsible organisations and says solutions are being investigated. These are commitments and allocations of responsibility; their completion and effectiveness still require evidence. [S19, pp 14–16]

Our submission therefore asks the proponent to reconcile that standard with the matters left to detailed design. If the remaining work could change feasibility, supply impacts or essential mitigation, the results should inform assessment and public scrutiny before determination. Later work may refine a solution whose limits have already been demonstrated.

Why these gaps affect more than water accounting

The table below identifies risks arising from unresolved resources and services, informed by the CWO experience. They must be assessed before approval.

Risk	How material deferral creates exposure	Assessment response sought
Community participation and daily life	Design, source or servicing choices may become clear only after approval. People then depend on later consultation or complaint pathways whose practical limits are illustrated by CWO - CASE STUDY 03–CWO - CASE STUDY 07.	Disclose consequential choices and alternatives while they can influence the decision. Assess cumulative service capacity and give substantive objections a reasoned response.
Environment and heritage	Essential safeguards may be incomplete, impracticable or poorly implemented when work is imminent. CWO - CASE STUDY 01 demonstrates an actual implementation failure; S18 identifies unresolved supply and drought-demand questions.	Demonstrate feasible mitigation and impact limits. Verify critical protections before disturbance, with monitoring and authority to reduce or stop the relevant activity.
Project timeline	Later investigations, resource agreements, infrastructure works or approvals may change the sequence of construction. Unfunded or unassigned dependencies add uncertainty. CWO - CASE STUDY 05 is the coordination comparator.	Publish dependencies, realistic lead times and responsible parties. Test whether essential resources and mitigation can be ready before each stage, including during drought.
Project cost and who pays	Changed water sources, treatment, storage, haulage, infrastructure or design may add costs once requirements are known. Unresolved funding can leave councils or other parties facing pressure to respond.	Identify feasible and funded mitigation, cost responsibility and contingencies. Show who bears additional costs if an assumed supply or mitigation measure cannot be delivered.

A practical test for each deferred matter

The decision maker should ask whether the later answer could materially alter the project footprint, resource requirement, impact significance, mitigation, alternative selected or construction sequence. If so, we seek enough evidence before determination to establish an acceptable and achievable outcome.

The EIS should identify what remains uncertain, how that uncertainty has been bounded and why the assessment conclusion remains reliable.

For work that can reasonably follow approval, the conditions should identify the required result, the evidence and independent verification needed, the responsible decision maker and the point beyond which work cannot proceed without satisfaction of the requirement. A task described only as further consultation or future approval does not explain those safeguards.

Why complaints cannot complete the original assessment

Complaints remain necessary during delivery, but they begin with an affected person identifying a problem. They do not supply the missing cumulative baseline or establish that a resource or mitigation measure was feasible when approval was granted. The CWO correspondence and inquiry findings support addressing these matters before the community must seek a remedy. [CWO - CASE STUDY 03–CWO - CASE STUDY 07; S02, Findings 11–12 and 17–19]

11 | Exhibited information is out of date

SEARs requirements for a full and accurate project description

Privacy. Landholders who received the correspondence quoted in this section are not named. Full copies of the emails can be provided to the Department on a confidential basis.

Summary

1. **The SEARs require a full, accurate description of the project, with suitable maps and plans.** The EIS must describe the project and show its disturbance area, layout, project area and footprint, and include high-quality maps and figures. (Amended SEARs, General requirements, pp. 1, 5)
2. **EnergyCo has told landholders in writing that the exhibited EIS is out of date.** The day before exhibition, EnergyCo wrote that information in the EIS "has been superceded" by design changes made in July and August 2026. The project area was "locked in (in March 2026)", seven months before exhibition. (2 EnergyCo emails, 14 and 19 October 2026 to 2 directly impacted landowners)
3. **The exhibited maps show infrastructure EnergyCo has already decided not to build.** They include a transmission alignment and an access track across the Macdonald River, and access tracks across a second landholder's property. EnergyCo says the real design will appear only in an Amendment Report "anticipated" around Q2 2027.
4. The community is being asked to comment on superseded parts of the design without the revised alignments or their assessed impacts.
5. **What we ask:** (a) the Department find that the EIS does not meet the SEARs requirement for a full and current project description; (b) EnergyCo publish every design change made since March 2026, with maps; (c) the updated design be fully assessed and re-exhibited before determination.

11.1 What the SEARs require

The Planning Secretary's Environmental Assessment Requirements (SEARs) set the minimum content of the EIS. Under the general requirements, the EIS must include:

- "A full description of the project, accompanied by suitable maps and plans". These must show the disturbance area, the physical layout, the project area and the development footprint. (Amended SEARs, General requirements, p. 1)
- "High quality files of maps and figures of the subject site and proposal". (Amended SEARs, General requirements, p. 5)

The purpose of exhibition is for the community, councils and agencies to comment on the project that is actually proposed. A description that its own author knows to be superseded at the time of exhibition does not meet that purpose.

11.2 EnergyCo acknowledges the EIS is out of date

11.2.1 The project area was frozen in March 2026

In two emails sent to landowners around the start of exhibition, EnergyCo explained that "the EIS project area had already been locked in (in March 2026), to enable calculation and assessment of impacts in time for the EIS to be published in October". Both emails state that "there will be some information presented in the EIS documents that has been superceded" by later discussions and design changes. (EnergyCo Biodiversity Manager, email of 14 October 2026; EnergyCo Acquisition Manager, email of 19 October 2026)

Design changes EnergyCo has acknowledged in writing but not exhibited.

Location	What the exhibited EIS shows	What EnergyCo says it will now do	Source
Macdonald River crossing (Niangala area)	Transmission alignment crossing the Macdonald River at the March 2026 location	"We will proceed with an alignment further to the east"	EnergyCo email, 14 Oct 2026
Macdonald River access track	A construction access track crossing the Macdonald River, a little east of the easement crossing	Track removed; construction traffic to use the existing Niangala Road bridge "only" and travel along the easement, "to avoid degradation to turtle and platypus habitat"	EnergyCo email, 14 Oct 2026
Second landholder property (WALCH)	Construction access tracks "traversing your property"	Access tracks removed from the property	EnergyCo email, 19 Oct 2026
Timing of the true design	Not shown	To be shown in an Amendment Report "anticipated to be submitted to the Department of Planning in ~Q2 2027"	Both emails

Note. The 14 October email was sent the day before exhibition opened and included a "rough map" showing the exhibited alignment (blue) and the alignment EnergyCo will now pursue (pink). That map was given to one landholder. It is not part of the exhibited EIS.

11.2.2 The changes affect sensitive parts of the assessment

The Macdonald River change is not a minor detail. The EIS itself records that the Macdonald River near Niangala Road supports habitat for the threatened Bell's turtle (EIS Ch 7, p. 247). EnergyCo's own reason for moving the access track is to protect turtle and platypus habitat. The alignment "further to the east" has therefore been chosen for biodiversity reasons, but its own biodiversity impacts are not in the exhibited assessment.

This sits alongside other parts of the EIS that are openly incomplete:

- Only about 54% of the project area had been surveyed for biodiversity, and a revised Biodiversity Development Assessment Report is to be prepared after exhibition (EIS Ch 7, p. 225).
- Two newly identified workforce camp sites (Camp 3 at Barry and a Camp 1 alternative) are to be assessed only in the Submissions Report or Amendment Report (EIS §3.3.5, pp. 110–111).
- The EIS seeks approval for final siting anywhere within the project corridor, so even the March 2026 layout is indicative (EIS Ch 6 §6.3, pp. 211–212).

11.2.3 Inconsistent baseline data

Technical Report 4 gives the Walcha LGA population as approximately 5,971 (section 3.2.3, p. 49), repeating the Uralla LGA figure on p. 44. Yet Appendix B records 3,016 residents for Walcha LGA (p. 46; PDF p. 292). EnergyCo must correct this contradiction, identify the baseline actually used and explain whether it affected the assessment of social and service impacts.

11.3 EIS shortcomings

- The EIS does not provide a full and current description of the project, as the SEARs require. EnergyCo knew at exhibition that parts of it were superseded.
- The maps exhibited to the public show infrastructure that will not be built, and omit infrastructure that will be.
- These changes were disclosed privately to individual landholders. The exhibited material gives neighbours, councils, agencies and the wider community no complete record of which design details remain current.
- The EIS does not include any register of design changes made between March 2026 and exhibition.

11.4 Consequences

- Submissions made during this exhibition comment on a superseded design. Landholders cannot comment properly on impacts to their own land when the maps are wrong.
- The design that will actually be built, including a new crossing of a river that supports threatened species, may never be exhibited for public comment unless the Department requires it.
- Impact figures calculated from the March 2026 project area (clearing, biodiversity credits, traffic, visual and agricultural impacts) may no longer match the project. The Department cannot rely on them as a basis for determination.
- EnergyCo anticipates the Amendment Report around Q2 2027, approximately six to nine months after the October 2026 exhibition.

> POSITION SOUGHT

More work and re-exhibition. The Department should:

1. Find that the exhibited EIS does not meet the SEARs requirement for a full description of the project with suitable maps and plans.
2. Require EnergyCo to publish a complete register of every design change made since the project area was locked in March 2026, with maps, including all changes already communicated privately to landholders.
3. Require the updated design, including the new Macdonald River alignment, to be fully assessed (biodiversity, heritage, traffic, visual and agricultural impacts) with recalculated impact figures.
4. Require the Amendment Report and revised assessments to be publicly exhibited for a full consultation period before any determination, with every affected landholder notified directly.
5. Make no determination until the community has been able to comment on the project that will actually be built.

Sources for section 11 - Correspondence is held on file and landholders are not named.

1. Amended SEARs, General requirements, pp. 1 and 5.
2. New England REZ EIS: section 3.3.5, pp. 110–111; chapter 6, section 6.3, pp. 211–212; chapter 7, pp. 225 and 247.
3. Technical Report 4 Social Impact Assessment: section 3.2.2, p. 44; section 3.2.3, p. 49; Appendix B, p. 46 (PDF p. 292). Planning Portal source
4. EnergyCo Biodiversity Manager, email to a Walcha-area landholder, "NE REZ transmission project: Information in EIS vs status of design", 14 October 2026, with attached sketch map.
5.EnergyCo Acquisition Manager, email to a landholder, "Re: Access tracks", 19 October 2026.

Requirements sought before determination

We ask the decision maker to require the following before determination, so the project's impacts, resource needs and protections are assessed and achievable.

Complete the material assessment Publish a register of matters deferred to design, investigation, agreement, management plans or later approvals, including design changes made before exhibition. Identify which could change feasibility, impacts or mitigation, and resolve those matters before determination. Where uncertainty remains, justify the assessed limits and test credible adverse scenarios.

Provide further effective public scrutiny Re-exhibit material new information that supplies a missing basis for assessment or changes impacts or mitigation, including the updated design and revised impact figures. Allow adequate time for affected communities to respond. Address substantive objections and alternatives with reasons while changes remain possible.

Demonstrate critical resource and service capacity For water, reconcile source locations, lawful and accessible volumes, existing users, cumulative project demand, drought conditions and peak delivery capacity. Identify consequential treatment, storage and transport works. Apply equivalent capacity tests to the other services and infrastructure on which the project relies.

Establish workable mitigation Show how the assessed design will avoid or manage material impacts, the required performance and the residual effects. Establish usable baselines. Demonstrate technical feasibility, delivery responsibility and funding before relying on a measure to justify approval.

Resolve shared responsibilities and dependencies Identify the agency able to decide cross-project capacity and sequencing conflicts, together with council and provider commitments, funding and delivery dates. Identify essential later permissions and the consequences if they cannot be obtained on the assumptions used in the EIS.

Set enforceable limits and verification points Constrain scale and staging to demonstrated capacity. Specify source and impact limits, independent verification, monitoring and clear reduction or suspension triggers. Require critical protections to be verified before relevant disturbance. CWO condition B15 expressly contemplates adjusting scale to available water. [S01, p 11]

Provide an effective independent remedy Define complaint ownership, response and resolution deadlines, reasoned decisions and independent escalation with authority over the relevant issue and parties. Include urgent intervention where continuing work risks irreversible harm. Distinguish a referral, file closure, completed corrective action and substantive resolution.

Make performance and correction public Publish monitoring, material incidents, compliance outcomes and corrective programs with owners and deadlines. Verify whether corrective action works. Preserve comparable measures when monitoring changes; completion of a reporting task should not stand in for achievement of the protective outcome.

If the evidence cannot demonstrate an acceptable and reliable outcome, our community seeks a reduced or staged development proposal supported by a completed assessment. The unresolved feasibility of essential protection should not be transferred to the community as a problem to pursue after approval.

Final comment

Our community objects to reliance on later design, investigation, agreements and approvals to resolve material information missing from the New England REZ EIS. The EIS should not have been exhibited in that state where the missing information is necessary to understand the project, assess its impacts or establish that essential mitigation and supplies are feasible. We seek completion of that work and a further effective opportunity for public scrutiny before determination.

This section documents why assurance of later protection is insufficient. The record includes admitted heritage implementation failures, missed social management targets and original correspondence showing substantive concerns continuing after complaint closure. The parliamentary inquiry found inadequate cumulative coordination, constraints on councils, consultation that did not always enable meaningful influence, and inadequate systemic remedies. These are concrete reasons to require demonstrated protection before approval. [Sections 3–7 and cases CWO - CASE STUDY 01–CWO - CASE STUDY 07; S02, Findings 3, 6–8, 11–12 and 17–19]

Our concern is the deferral of information that can change the assessment's conclusions. Detailed engineering may refine a project within limits whose feasibility and impacts have been demonstrated. However, material resource constraints, cumulative demands, consequential design choices and the practicability of mitigation must inform the decision. A later management plan or complaint mechanism cannot supply the public opportunity to test those matters before the principal approval.

Water illustrates the gap. Technical Report 14 leaves final sourcing and further consideration of drought-related demand to detailed design. The October 2026 regional update estimates demand while excluding source availability and other-user demand, yet states that secure water and cumulative impacts must be demonstrated before approval.

The large revision to reported potable demand also requires a clear reconciliation of assumptions. It does not establish that the revised demand can be met.

A ratio of forecast demand to regional licensed allocation does not establish water secured for the project or a reliable supply under the relevant conditions. We seek the integrated, source-specific evidence needed to reconcile these documents. [Sections 8–10; S18, pp 81–87; S19, pp 5, 14–16]

EnergyCo's correspondence also acknowledges that some exhibited designs were already superseded. The revised design and its impacts must be assessed and publicly exhibited before determination. [Section 11]

Deferring those questions may expose the community and environment to avoidable impacts and may require later redesign, additional infrastructure, changed sourcing or rescheduling. Those are prospective risks to cost and delivery time that should be assessed now.

We ask for material gaps to be resolved, new information to be publicly tested, mitigation and capacity to be demonstrated and funded, and any approval to include enforceable limits and verification before relevant works. The CWO evidence supports protection before harm and effective participation before the decision is committed. [Sections 10–12]

Source register

Sources S01–S27 are linked by title. Section 11 lists its additional assessment documents and correspondence. Page references are printed pages unless "PDF" is specified. For S01, add three to the printed page for the consolidated PDF; for S02 Report 65, add nineteen to numbered main-text pages. Dates and version descriptions identify the evidence being relied on.

S01 NSW planning approval for CWO REZ Transmission SSI 48323210

Original determination 26 June 2024; consolidated MOD 4 dated 2 December 2025. Relevant conditions A7, A17, A21–A22, B15, B27–B28, B35, B55 and C10–C17. Pinpoints: printed pp 6, 8, 11, 14–16, 20, 23–24. Binding approval instrument; exact application to an individual incident still requires the event record.

S02 NSW Legislative Council Portfolio Committee 4 REZ inquiry reports

Report 62, 21 August 2025: Finding 3 p 45; Recommendation 1 p 36. Report 65, tabled 29 July 2026: Findings 3 and 6–8 pp 56–59; 11–13 p 62; 16 p 65; 17–19 p 67; 24–25 p 111. Recommendations 2–4 pp 58–59; 7–12 pp 64–67; 15–16 pp 110–111. Inquiry index also records response dates and deadlines.

S03 EnergyCo Social Impact Management Plan Summary

June 2025, 20 pages. Scope p 6; housing p 12; traffic p 13; biosecurity p 14; services p 15; communication p 16; heritage p 17; agriculture p 18; participation p 19; reporting p 20. Public assurance document, read alongside the approved plan and conditions.

S04 EnergyCo CWO REZ Social Impact Management Plan

Revision 5, December 2025; authorisation January 2026, pp 3–4. Full document, 178 pages. Heritage pp 79–81; D-01 and Table 31 pp 88–90; adaptive management pp 91–93; Appendix E SI7 p 164; wider initiatives Appendix G pp 173–176. The filename is not the authoritative version date.

S05 EnergyCo Annual Community Attitudes Survey Summary of Results

August 2026, six pages. Results pp 1–5; fieldwork April–May 2026.

S06 ACEREZ public statements on the Aboriginal rock shelter

Statements dated 25 May and 23 June 2026 in the company news archive. Company admissions and corrective-action statements. Read with the contemporaneous ABC report S07; these statements are not a regulator's final determination.

S07 ABC report on the ACEREZ heritage investigation

Xanthe Gregory and Lani Oataway, 23 June 2026, "ACEREZ investigation finds failures during construction led to Aboriginal rock shelter destruction". Reported company admissions, Traditional Owner comment and corrective measures. Distinguish its separate discussion of federal bird-clearing compliance.

S08 Emma Bowman Additional Information published by Parliament

19 June 2025 correspondence bundle, 108 pages. Merotherie pp 27–28, 31–32, 35, 50–52; Lawson pp 83, 90, 99. Page 84 contains proposed conditions.

S09 Mid Western Regional Council supplementary inquiry answers

General Manager Brad Cam; received 16 June 2025. Questions 21 and 25 p 5, 28–29 p 6 and 30 p 7. Official local-government evidence about resources, coordination and outcomes, with acknowledgement of benefits and some funding.

S10 NSW parliamentary questions and ministerial answers on CWO REZ

John Ruddick questions lodged 8 October 2025; answered 29 October 2025. Questions 4–5 concern road consultation and advice; question 9 water sources and licence details; questions 10–11 meeting records. A public response record, not a water-compliance determination.

S11 CWO Community Reference Group minutes 5 May 2026

School-hour delivery concern and follow-up p 5; cumulative transport p 8. The minutes record a participant's recollection of prior advice; they are not the original assurance itself.

S12 CWO Community Reference Group minutes 11 August 2026

Earlier follow-up marked closed p 3; road-maintenance concerns p 6; school and medical transport reports pp 8–9. Official record of concerns and responses, not an independent incident or condition-breach determination.

S13 Dubbo Regional Council September 2026 meeting outcomes

Ordinary meeting 22 September 2026, published 23 September. Resolutions concerning local benefits, staffing and funding, exhibition periods and council participation. Resolutions to make representations do not establish that letters were already sent or refused.

S14 EWON responses to supplementary inquiry questions

Received 1 May 2026. Answers 4–6, printed pp 4–5 of 9, physical PDF pp 2–3: complaints finalised, jurisdiction and referrals. Figures are NSW-wide. The seven-page PDF retains page numbering from a longer submission.

S15 EWON renewable energy infrastructure jurisdiction and annual report

Current jurisdiction page checked 21 October 2026. Annual Report 2025–26, pp 27–30, describes continuing generation/storage membership work. Distinguish its reporting period from the supplementary-answer statistics in S14.

S16 ABC report on the disputed Merotherie Road alternative

Xanthe Gregory, 3 December 2025. Named council account of negotiations and tree clearing, with EnergyCo and ACEREZ responses. Evidence of disputed outcomes and alternatives, not proof of unlawful clearing.

S17 Government response and regional infrastructure studies

Response to Report 62 tabled November 2025, three pages, linked on the inquiry index S02. Recommendation 1 supported with reference to regional studies; recommendation 3 supported in principle. The regional-study portal documents subsequent published work. Assess against the final committee's later critique, rather than claiming no studies exist.

S18 New England REZ EIS Technical Report 14 Surface Water Assessment

EIS technical report, October 2026 exhibition material. Section 4.2 p 81; Table 4.2 p 82; data limitations p 83; construction demand p 85; geographic assumptions p 86; Table 4.3, section 4.4.1.2 sourcing and drought-demand deferrals, and section 4.5.1 wastewater design and capacity p 87. Physical PDF pp 88–94 in the 226-page copy. The linked EIS portal is the publication entry point.

S19 EnergyCo New England REZ regional water demand update

October 2026, 17 pages. Scope and totals p 5; LGA data pp 6 and 8; model pp 10–13; preapproval standard p 14; further work p 16. LGA figures refer to project location, not water-source location. All model figures are forecasts, not measured consumption.

S20 NSW DCCEEW water allocation guidance

"Principles for allocating water" explains availability and allocation constraints. "Controlled allocations" distinguishes access licences from works approvals and extraction-impact assessment. General framework guidance; it does not establish any particular project's lawful volume.

S21 NSW Public Works water correspondence held by the submission groups

Jennifer Blaikie email, 31 July 2026, responding to questions of 30 July; three-page file titled "Question and Response from Jenifer Blaikie - NSW Water.docx". Generic advice, expressly without current/recent Walcha engagement. Retain the original correspondence with the submission evidence; no private contact details are reproduced here.

S22 Daily Telegraph report of continuing water concerns

27 July 2026 AEST, "Outgoing council chief slams region's disruption from huge green energy zone". Attributes licensing concerns to Brad Cam and bore-impact allegations to Bowman, with EnergyCo's contrary position. This section does not adopt the allegations as established hydrological causation or illegal extraction.

S23 Mid Western Regional Council water alliance funding release

"Alliance welcomes funding announcement", 28 May 2026. Evidence of an announced funding initiative; relevant to avoiding a blanket claim that no regional water response or funding has occurred. It does not establish resolution of each site-specific supply question.

S24 CWO Community Reference Group minutes 17 February 2026

Page 12 records EnergyCo's statement that no EWON complaints were then open. This is relevant when describing historical complaint status; it does not independently measure complainant satisfaction.

S25 Corrected parliamentary hearing transcript 16 May 2025

Dubbo hearing, printed pp 17–18, physical PDF pp 19–20. Sally Edwards's account of an early complaint barrier concerns the NSW Ombudsman in March 2024, before EWON's later expanded role. Witness evidence, not an Ombudsman admission or a current jurisdiction finding.

S26 Public social media advocacy and reproduced statements

Andrew Gee's public Merotherie Road wildlife video and heritage posts were located in search results. Full post contents, dates and attachments were not independently verified. They are contextual leads only and do not carry a factual breach allegation in this section. Contemporaneous published reporting is identified separately in S07 and S16.

S27 NSW DCCEEW Water availability and access pathways for CWO REZ

May 2025 report, approved 13 May; public version 28 July 2025. March 2025 information baseline. Executive findings pp 7–9; EIS-data limitations section 2.4.8 p 16. The date in the upload directory is not the report date. Supports distinguishing aggregate entitlement from reliable access.

Additional direct links for cited companion documents

S02 Report 65 final report

S02 Report 62 first report

S15 EWON Annual Report 2025 to 2026

S17 Government response to the first report

S20 Controlled allocations guidance

S26 Andrew Gee public heritage post

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha