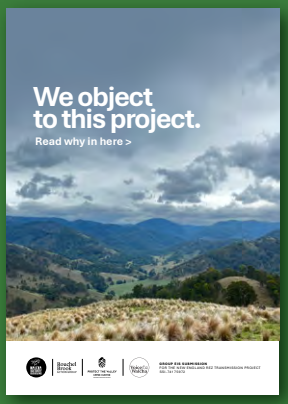
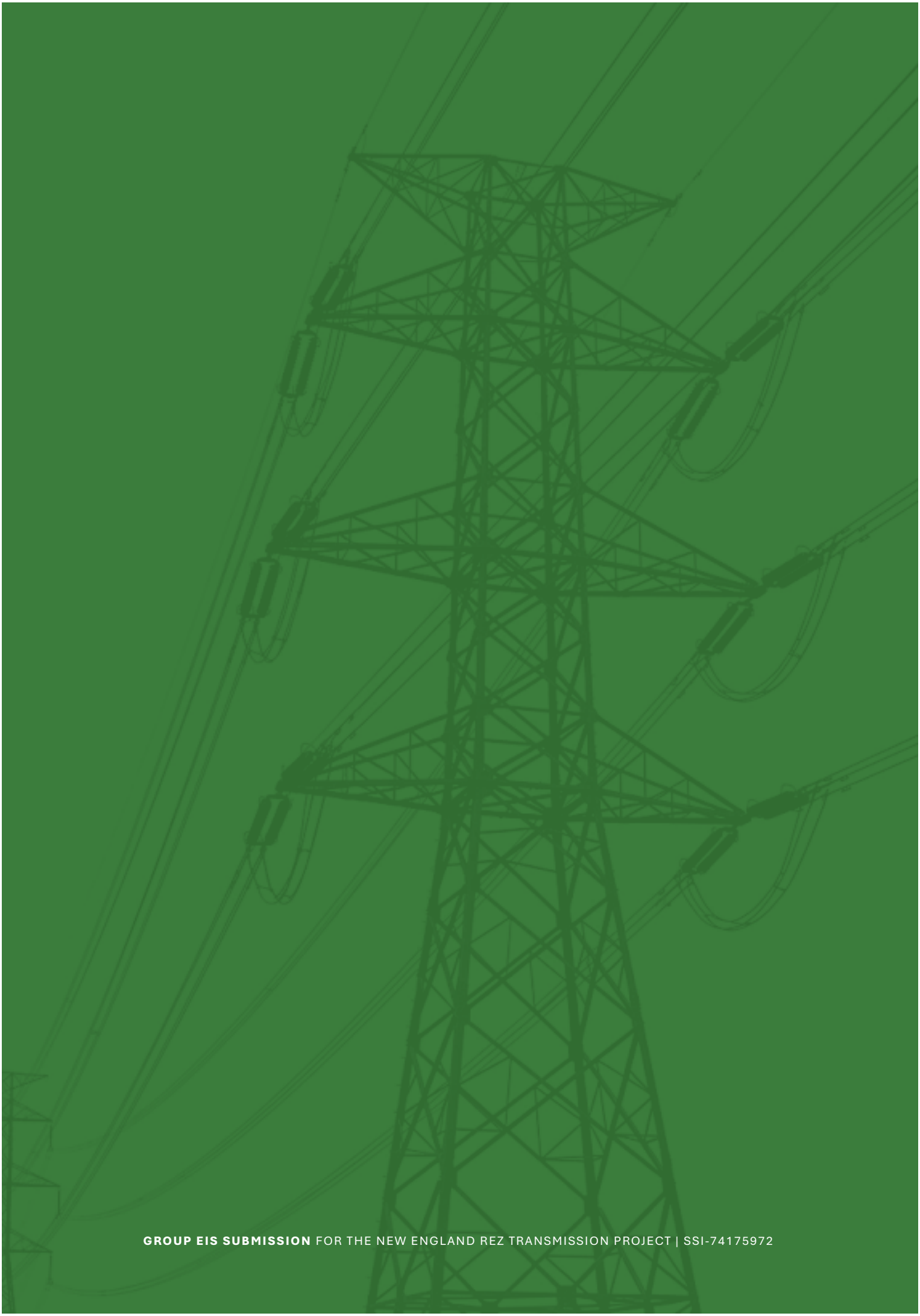
SECTION **9**

Project Constructability Part A, Part B and Part C

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 9

Project Constructability Part A, Part B and Part C

Key issues we have found ...



Weather and fire threaten delivery

Rain, fog, wind and bushfire restrictions can stop work, while realistic workable days and resulting construction duration remain insufficiently demonstrated.



Steep access multiplies disturbance

Olsland's steep slopes and unstable soils illustrate how wider access roads can increase excavation, imported gravel, erosion and lasting disruption.



Helicopter access remains weather dependent

Helicopters require specialist crews, suitable staging areas and safe flying conditions; alternatives could increase clearing, traffic, noise and construction delays.



Quarry supply remains unidentified

The project requires 1.734 million cubic metres of quarry products, without named suppliers, verified available capacity or confirmed delivery distances.



Critical resource availability remains unproven

Skilled crews, specialist plant and serviced camps must be available together, yet competing projects and procurement times leave delivery uncertain.



Prove the whole construction pathway

Construction needs coordinated water, waste, haulage, accommodation and materials, with evidence that all dependencies fit the assessed timetable and footprint.

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Read in more detail >



> Steep slopes lead to slippery ground, and dangerous conditions

SECTION **9**

Part A - Project Constructability and Delivery Risk

Has EnergyCo demonstrated that the project described in the EIS is sufficiently designed, understood and practically constructible for its environmental and social impacts to be reliably assessed?

EXECUTIVE SUMMARY

The EIS does not demonstrate that the New England REZ Network Infrastructure Project can be constructed and completed within the construction methods, disturbance footprint, resource assumptions and timeframe on which its impact assessments rely.

The proposed corridor crosses steep, elevated and high-rainfall country. Persistent wet weather, difficult access, complex tower sites, helicopter dependence, bushfire and contested land access create substantial risks to safe construction and timely completion. The practical experience of landholders and local construction operators must be central to assessing those risks.

The project also depends on waste disposal, heavy vehicles and roads, a skilled workforce, serviced accommodation and secure water. EnergyCo's resource studies identify significant constraints. Its current project information still leaves important supply and accommodation decisions unresolved. These dependencies must be assessed together: solving one shortage can increase traffic, disturbance, infrastructure demand and delay elsewhere.

These are matters for the EIS and the planning decision. Construction decisions determine the magnitude, location and duration of environmental and social impacts. The Department must establish a credible construction pathway before recommending approval, with evidence that essential resources and enabling infrastructure can be delivered when required.

The project should not be approved in its present form unless EnergyCo resolves the matters set out in the closing questions and demands. A promise that the future Network Operator or contractor will find solutions is not sufficient.

The planning relevance is direct. Wider tracks, different foundations, additional water and waste haulage, new camps or a longer construction period can change the impacts being approved. Sections 5.18 and 5.19 of the Environmental Planning and Assessment Act 1979 provide for the Secretary's assessment report and the Minister's consideration of that report. Constructability must be addressed to the extent needed to assess those impacts. [12]

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Constructability

The proposed transmission corridor crosses country that will be extraordinarily difficult, costly and slow to build through. EnergyCo's desktop analysis may show that construction is technically possible, but it does not reflect how this terrain behaves in real conditions.

Landholders work on these slopes throughout the year. They understand where heavy vehicles lose traction, where water remains on or moves across the ground, how quickly tracks deteriorate, how long the soil takes to recover, where fog and wind restrict operations, and which areas cannot be safely accessed with ordinary machinery.

This on-ground experience raises serious doubt about whether EnergyCo understands the practical construction task it is proposing.

The construction evidence below is set out in the Walcha High Country Guardians briefing prepared for the Minister for Planning and Public Spaces on 30 September 2026. [1]



1 | Rainfall and the construction season

The Mount Sandon rainfall record for 2026 reproduced below demonstrates the problem.

Based on this rainfall record and the experience of people who work in this country, it is unlikely there would have been any construction between 21 April and early September 2026.

Between 21 April and 31 August 2026, rainfall was recorded on 112 of 133 days—84 per cent of the period. The month of May recorded 24 rain days, June 29, July 26 and August 24. Rain was recorded on nine of the final ten days of April. Looking at past records from this weather station, this is not an unusual rainfall pattern.

Rainfall is not confined to isolated events followed by extended dry periods. It is persistent. In steep basalt country, even small daily falls matter when they occur repeatedly, and the ground does not have time to dry.

Mount Sandon Rain Chart 2026

Year: 2026

Daily rainfall (mm)

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	-	-	1.2	-	0.4	1.6	0.4	0.2	-			
2	0.8	5.2	-	-	-	4.4	0.2	0.2	-			
3	-	2.2	-	-	-	6.0	0.6	-	-			
4	51.8	-	0.2	-	0.4	8.4	0.2	4.2	-			
5	14.6	-	-	-	1.8	2.4	0.4	6.2	-			
6	-	-	-	-	3.6	2.2	0.4	0.2	0.8			
7	-	1.0	-	-	-	2.2	0.2	-	0.6			
8	-	-	-	-	-	4.6	0.4	-	-			
9	-	-	-	-	-	6.6	0.4	-	-			
10	-	9.8	-	-	0.2	7.0	0.4	7.0	0.2			
11	-	-	-	-	-	6.4	0.4	14.0	0.2			
12	18.8	0.2	-	-	1.6	3.8	0.4	40.8	-			
13	0.2	1.8	-	-	0.2	2.2	0.8	6.6	-			
14	-	0.6	-	-	1.4	1.6	0.8	1.6	-			
15	5.0	1.0	-	-	0.2	1.0	0.4	0.2				
16	7.0	0.4	-	-	-	0.8	0.6	-				
17	4.4	-	-	-	0.2	0.8	0.4	0.4				
18	3.2	-	-	-	1.8	0.6	0.6	0.6				
19	4.8	-	-	-	68.8	0.6	0.4	1.0				
20	0.4	-	-	-	22.4	0.6	0.4	0.4				
21	-	5.6	-	0.2	6.8	1.0	0.4	-				
22	-	8.8	-	0.4	2.6	0.6	0.4	2.0				
23	-	6.2	-	0.2	1.6	0.4	0.2	3.2				
24	-	-	-	-	0.8	0.4	1.2	3.0				
25	0.2	-	-	1.2	0.2	0.4	2.6	1.6				
26	-	-	-	0.4	0.2	0.2	-	2.2				
27	-	1.0	-	0.4	0.2	0.4	-	12.2				
28	0.2	0.8	-	0.2	1.2	0.4	0.2	9.4				
29	-		0.2	0.2	1.6	-	-	3.0				
30	-		0.2	0.2	2.2	0.4	-	0.2				
31	-		-		2.0		-	-				
Rain Days	13	14	4	9	24	29	26	24	4			
Month Total	111.4	44.6	1.8	3.4	122.4	68.0	13.8	120.4	1.8			
Year to Date	111	156	158	161	284	352	365	486	488			

Figure 1 - **OzForecast rain chart for Mount Sandon (Niangala) 2026. Reproduced in the Scully meeting brief, p. 7. [1]**

Past rainfall charts for 2022–2025 are reproduced below

Mount Sandon Rain Chart 2025

Year: 2025

Daily rainfall (mm)

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	-	x	x	2.0	0.2	x	x	x	x	x	x	-
2	0.4	x	x	1.2	-	x	x	x	x	x	x	11.4
3	-	x	x	1.0	-	x	x	x	x	x	x	0.2
4	-	x	x	1.4	0.2	x	x	x	x	x	3.6	-
5	0.2	x	x	9.0	-	x	x	x	x	x	-	-
6	-	x	x	0.8	0.2	x	x	x	x	x	-	-
7	-	x	x	9.2	-	x	x	x	x	x	-	0.8
8	-	x	x	1.0	-	x	x	x	x	x	10.0	10.4
9	-	x	x	-	0.2	x	x	x	x	x	5.6	-
10	-	x	x	-	-	x	x	x	x	x	-	-
11	x	x	x	-	0.2	x	x	x	x	x	-	23.0
12	x	x	x	-	-	x	x	x	x	x	0.2	4.8
13	x	x	x	0.2	-	x	x	x	x	x	-	9.6
14	x	x	x	-	0.2	x	x	x	x	x	-	-
15	x	x	x	-	-	x	x	x	x	x	1.4	-
16	x	x	x	0.2	-	x	x	x	x	x	36.6	-
17	x	x	x	-	0.2	x	x	x	x	x	0.2	-
18	x	x	x	-	-	x	x	x	x	x	-	-
19	x	x	x	-	0.2	x	x	x	x	x	-	-
20	x	x	x	-	-	x	x	x	x	x	-	10.6
21	x	x	x	-	x	x	x	x	x	x	8.8	-
22	x	x	x	0.2	x	x	x	x	x	x	0.6	-
23	x	x	x	-	x	x	x	x	x	x	5.2	11.2
24	x	x	x	0.2	x	x	x	x	x	x	11.0	-
25	x	x	-	-	x	x	x	x	x	x	-	-
26	x	x	0.2	-	x	x	x	x	x	x	10.2	-
27	x	x	0.2	-	x	x	x	x	x	x	21.0	0.2
28	x	x	0.2	0.2	x	x	x	x	x	x	-	-
29	x		0.2	0.2	x	x	x	x	x	x	-	-
30	x		0.4	-	x	x	x	x	x	x	-	-
31	x		1.8		x		x	x		x		-
Rain Days	2	x	6	14	8	x	x	x	x	x	13	10
Month Total	0.6	x	3.0	26.8	1.6	x	x	x	x	x	114.4	82.2
Year to Date	1	x	4	30	32	x	x	x	x	x	146	229

Mount Sandon Rain Chart 2024

Year: 2024

Daily rainfall (mm)

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	-	-	x	-	x	32.0	26.8	-	-	x	x	-
2	0.2	-	x	0.4	x	21.0	2.4	0.2	-	x	x	-
3	-	-	x	12.4	x	0.6	0.8	-	-	x	x	-
4	-	-	x	0.6	x	-	0.6	0.4	-	x	x	-
5	2.4	0.2	x	16.8	x	-	0.4	-	-	x	x	-
6	0.2	-	x	30.4	x	-	1.8	32.4	-	x	x	-
7	0.2	7.4	x	x	x	-	0.4	0.2	-	x	-	-
8	-	1.8	x	x	x	9.0	-	-	-	x	x	-
9	6.0	-	x	x	x	1.6	19.8	-	-	x	x	-
10	21.6	0.4	-	x	x	-	7.6	-	-	x	x	-
11	9.6	1.6	-	x	x	-	-	-	-	x	x	-
12	5.4	-	-	x	x	0.2	0.2	4.8	25.6	x	x	-
13	-	2.4	0.2	x	x	-	-	3.0	6.2	x	x	-
14	-	-	-	x	x	-	-	2.2	x	x	x	-
15	-	-	x	x	x	8.6	1.0	4.6	x	x	-	-
16	0.6	0.2	x	x	x	2.2	1.6	5.6	x	x	-	-
17	0.2	6.4	x	x	x	-	14.6	5.2	x	x	-	-
18	29.0	-	x	x	x	0.2	20.8	1.0	x	x	-	-
19	12.6	18.0	x	x	x	-	-	0.2	x	x	-	-
20	-	5.4	-	x	x	0.2	-	0.2	x	x	-	-
21	-	0.6	3.6	x	x	-	-	0.2	x	x	-	-
22	-	-	x	x	x	2.4	0.2	-	x	x	-	-
23	-	6.0	x	x	x	1.0	-	-	x	x	-	-
24	-	4.0	x	x	x	1.6	0.2	-	x	x	-	-
25	-	11.0	x	x	x	-	-	0.8	x	x	-	-
26	-	0.2	x	x	x	-	23.8	6.4	x	x	-	-
27	-	x	-	x	x	1.0	11.4	-	x	x	-	-
28	54.2	x	x	x	0.4	-	22.8	-	x	x	-	-
29	-	x	x	x	-	-	-	-	x	x	-	-
30	3.2		x	x	0.2	13.4	-	-	x	x	-	-
31	-		x		-		-	-		x		-
Rain Days	14	15	2	5	2	15	19	16	2	x	0	0
Month Total	145.4	65.6	3.8	60.6	0.6	95.6	156.8	67.4	31.8	x	0.0	0.0
Year to Date	145	211	215	275	276	372	528	596	628	x	628	628

Mount Sandon Rain Chart 2023

Year: 2023

Daily rainfall (mm)

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	0.6	3.4	-	-	-	-	0.2	-	0.2	-	-	-
2	-	0.2	-	-	-	-	0.4	-	-	-	-	12.0
3	0.6	-	-	-	-	-	-	0.2	-	-	-	1.6
4	2.6	-	0.2	-	-	0.6	3.8	-	-	-	24.6	-
5	9.0	-	0.2	0.8	-	0.6	21.8	-	-	20.8	-	-
6	0.4	-	-	0.6	-	-	7.8	-	-	-	-	-
7	0.4	-	-	0.2	-	0.2	5.0	-	-	-	-	-
8	0.6	1.0	1.2	12.4	-	0.2	0.2	-	1.4	-	-	0.6
9	0.2	0.2	5.4	2.6	-	10.6	0.2	0.2	4.4	-	1.2	-
10	-	1.4	-	0.2	-	0.2	0.4	-	0.2	0.2	31.8	-
11	-	-	-	-	0.2	-	0.2	-	-	-	1.8	-
12	-	-	20.4	-	0.4	0.2	-	-	-	-	-	-
13	0.2	-	17.6	5.6	0.2	-	-	-	-	-	-	-
14	0.2	6.0	2.2	2.2	0.2	23.0	0.2	0.2	-	-	-	-
15	-	21.0	13.4	0.2	0.2	0.2	-	1.6	-	-	-	-
16	0.2	-	-	-	-	0.2	-	-	-	-	-	-
17	0.2	-	-	-	0.6	-	-	-	-	-	6.8	-
18	-	-	-	-	0.8	-	0.8	22.8	-	-	-	-
19	0.2	8.6	-	-	-	-	-	0.6	-	-	-	-
20	3.8	0.2	-	-	-	0.4	-	-	-	-	10.0	12.2
21	0.6	-	0.4	5.8	0.4	-	-	-	-	-	12.6	21.2
22	6.2	-	-	0.2	-	-	3.0	-	-	-	5.4	0.4
23	11.0	2.8	0.6	-	-	18.0	0.2	-	-	-	12.8	0.2
24	0.6	2.6	15.2	0.2	-	1.4	0.8	-	-	-	0.2	7.2
25	0.2	0.2	14.0	1.4	-	-	0.2	-	-	-	5.8	11.2
26	-	-	0.4	-	-	-	-	-	-	-	9.6	1.8
27	5.4	0.2	0.2	0.4	1.4	-	0.2	-	-	14.6	0.4	-
28	10.6	4.6	8.8	-	-	-	-	-	-	0.8	-	-
29	-		26.4	-	-	22.4	-	-	0.2	0.4	3.8	-
30	13.6		14.2	20.8	-	0.2	-	0.2	-	-	2.4	0.2
31	19.2		-		-		0.2	5.2		-		-
Rain Days	23	14	17	15	9	15	18	8	5	5	15	11
Month Total	86.6	82.4	140.8	63.6	4.4	78.4	45.6	31.0	6.4	36.8	129.2	68.6
Year to Date	87	139	280	333	338	416	462	493	499	536	665	734

Mount Sandon Rain Chart 2022

Year: 2022

Daily rainfall (mm)

Day	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
1	-	0.2	1.4	1.8	7.4	15.4	-	-	0.2	0.8	105.2	-
2	-	46.6	0.6	0.6	0.4	0.2	9.6	13.8	5.0	-	19.0	1.4
3	-	15.0	2.8	-	0.2	-	1.6	-	15.6	0.2	1.2	-
4	0.2	4.4	29.6	1.0	0.4	25.4	3.4	0.4	7.4	-	2.2	0.2
5	1.0	3.2	0.4	0.4	1.8	1.0	0.4	61.8	1.2	-	0.2	0.2
6	2.2	5.6	11.0	-	1.2	1.6	4.4	17.8	-	4.6	-	-
7	0.2	3.6	10.0	7.0	0.2	1.2	24.8	0.8	-	0.6	-	-
8	3.8	0.4	10.8	0.8	-	1.0	0.6	1.2	0.4	27.2	4.2	1.6
9	0.2	-	5.2	0.6	-	-	-	0.2	14.8	27.8	5.8	-
10	16.2	-	0.2	-	0.2	0.2	0.4	1.8	3.8	2.6	-	-
11	3.6	0.6	-	0.6	0.6	0.2	1.0	-	8.4	-	-	-
12	26.0	1.2	-	0.2	6.6	-	0.2	1.6	0.2	0.4	2.2	3.4
13	1.6	-	-	-	25.4	-	0.4	22.0	-	0.2	-	23.0
14	0.2	0.2	-	1.8	1.4	0.4	3.6	9.2	-	4.4	51.8	-
15	-	0.2	-	1.0	-	0.2	0.2	8.8	2.8	2.6	11.2	-
16	3.8	-	0.6	0.2	0.4	0.2	-	6.6	50.2	0.2	-	-
17	0.2	-	0.2	0.4	-	-	-	3.0	-	-	-	-
18	0.2	0.2	0.6	0.4	0.2	0.2	4.0	-	-	0.2	-	-
19	16.4	-	-	0.4	0.2	0.2	-	-	-	1.4	-	0.4
20	8.6	-	2.0	-	-	0.2	0.4	0.2	-	10.8	2.6	-
21	1.6	-	-	0.4	0.4	0.2	0.6	-	-	54.4	-	-
22	4.2	16.6	0.2	-	3.0	-	2.0	0.2	44.4	12.6	-	-
23	0.4	0.2	-	1.4	10.6	-	1.8	-	10.8	22.6	-	11.0
24	0.2	1.2	4.6	1.0	0.4	0.2	0.2	11.0	11.0	0.2	-	19.4
25	-	12.6	12.2	0.4	x	0.6	0.4	2.0	4.2	0.2	-	0.4
26	7.2	0.4	16.6	0.4	-	-	0.2	-	0.2	11.4	-	-
27	-	0.4	0.6	-	8.8	-	0.8	0.2	-	0.2	-	-
28	0.2	0.8	11.0	1.4	0.2	-	-	-	-	5.6	3.2	-
29	-		3.0	-	0.4	0.2	0.4	0.2	-	-	-	0.2
30	0.4		13.8	0.2	-	-	1.0	0.6	1.4	-	0.2	0.2
31	0.2		3.6		37.2		0.2	5.2		-		0.2
Rain Days	24	20	23	22	23	19	25	22	18	23	13	13
Month Total	98.8	113.6	141.0	22.4	107.6	48.8	62.6	168.6	182.0	191.2	209.0	61.6
Year to Date	99	212	353	376	483	532	595	763	945	1137	1346	1407

> Please note: the above weather station, located close to the intersection of Forest Way and Topdale Rd. (Approximately 1100m from the centreline of the transmission line). The X notations in the data set reflect faulty weather station during those dates in 2024 and 2025.

EnergyCo must show how its construction program allows for the number of realistically workable days in these conditions, including the time needed for soils and access tracks to dry, repair of weather damage and the consequences for sequencing and total construction duration.

The High Rainfall multiplier effect

The combination of **high number of rain days** with high altitude leading to **high fog incidence** in a **cool, cloudy** environment, leads to the **ground being wet** a lot of the time. The days following rain are **not conducive to drying** in these conditions. Combine this with steep slopes, on basalt soils with high clay content, and you have an environment that leads to **slippery ground, and dangerous conditions.**

On these same steep slippery slopes, makeshift roads, and even permanent roads, suffer land slip and erosion damage that needs constant repair and maintenance, prior to the main work starting again. Heavy machinery and outdoor work is limited in these conditions.

And then the rains starts again.

This can lead to a constant and exasperating extension of project delays, cost blow outs, and inevitable risk of contract non-delivery.



> Figure 1 - **High rainfall areas often have days of fog, cloud and drizzle that may not even record as a ran day, but prevents the drying of ground**



> Figure 2 - **High elevation (>1000m) on the New England Tablelands is often associated with a high incidence of fog and a lack of sunshine.**

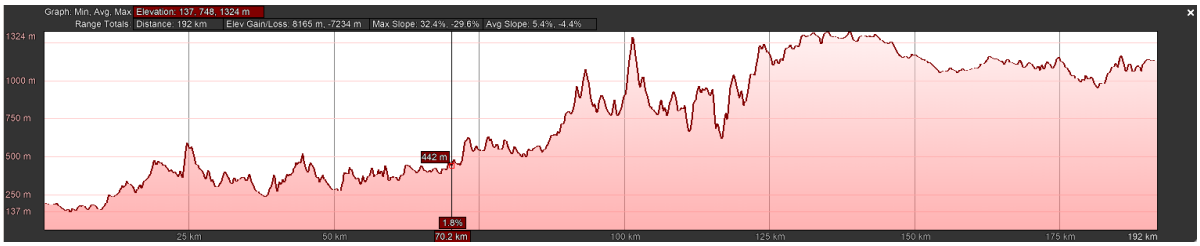
These are the same areas that are requiring helicopter access, not just for stringing, but for access for materials and construction equipment. This type of machinery is very susceptible to weather, with visibility constraints in fog and rain as well as operational constraints in windy conditions.



Figure 3 - **A wet winter stays wet in this environment. Consecutive rain days, followed by cloud and fog, then further rain days. You cannot travel on slopes for months during winter.**

2 | Terrain, gradient and altitude

The proposed easement profile from Bayswater to Central South Hub demonstrates the scale of the physical challenge.



> Figure 2 Profile of the 192 km transmission alignment from Bayswater to Central South Hub, reproduced in the Scully meeting brief, p. 8. [1]

Across its 192-kilometre length from Bayswater to Walcha, the route rises from approximately 137 metres to a maximum elevation of 1,324 metres. It has a maximum ascending slope of 32.4 per cent and a maximum descending slope of 29.6 per cent.

The route involves approximately 8,165 metres of cumulative elevation gain and 7,234 metres of cumulative elevation loss. Construction teams and heavy equipment would face more than 15,000 metres of combined climbing and descent along the transmission alignment.

The profile shows repeated steep rises and falls through the first 125 kilometres before the route climbs onto elevated country. Much of the remainder of the route remains at or above approximately 1,000 metres, with sections reaching more than 1,300 metres.

The profile shows the elevation of the transmission alignment itself. It does not show the additional difficulty of constructing access tracks across natural side slopes, reaching individual tower sites, establishing level tower pads or moving cranes, concrete trucks and other heavy equipment between work fronts.

The elevated sections would also expose construction to snow, ice, high winds, fog and low cloud. These conditions will restrict crane and helicopter operations, conductor stringing, heavy haulage and work on exposed tower sites.



> Figure 4 - **Typical winter snowfalls at 1230m ASL, 200m from the transmission centreline.**

EnergyCo may say that towers can be designed to comply with the relevant Australian standards. That addresses whether the completed infrastructure can withstand these conditions. It does not answer how the infrastructure can be constructed safely, economically and within the proposed timeframe.

The profile confirms that this is an exceptionally demanding construction corridor. Even before access-track gradients, wet-weather delays and individual tower-site constraints are taken into account, the route's length, cumulative elevation change, steep maximum slopes and prolonged exposure to high-altitude conditions create substantial risks of reduced productivity, construction delays and cost escalation.

EnergyCo does not have the on-ground knowledge required to understand the seriousness of these constraints. Desktop modelling cannot replicate the experience of landholders, or local construction operators, who work in this terrain throughout the year and understand how its slopes, soils, rainfall and weather conditions interact. This is a significant shortfall of an EIS process, that is compounded with these conditions.



> Figure 5 - **Crawny Road, south of Crawny Pass, in one of the the more accessible parts of the transmission route where the public road was built.**

3 | Access tracks and tower sites

EnergyCo's own constructability assessment exposes the scale of the earthworks and access required for the proposed corridor. Its July 2025 Bulk Corridor Design Refinement Report identifies:

- approximately 1,318 transmission towers;
- 116 towers requiring complex Type C tower-pad construction;
- approximately 670 kilometres of access tracks;
- approximately 28 kilometres of access tracks exceeding a 21 per cent gradient;
- approximately 97 towers serviced by access tracks exceeding an 18 per cent gradient;
- approximately one million cubic metres of surplus earthworks; and
- approximately 126,000 spoil-truck movements on local roads from tower-pad earthworks.

These figures reveal a major civil construction project within the transmission project itself. For a transmission corridor approximately 305 kilometres long, EnergyCo proposes to construct approximately 670 kilometres of access tracks—more than two kilometres of access track for every kilometre of corridor. These tracks must be built before the towers and transmission lines can be constructed. This is the reality of building in remote terrain.

Twenty-eight kilometres of access tracks would exceed a 21 per cent gradient. Approximately 97 tower sites would be serviced by tracks exceeding an 18 per cent grade, and 116 towers would require complex tower-pad construction.

EnergyCo estimates that tower-pad construction will generate approximately one million cubic metres of surplus material and 126,000 spoil-truck movements on local roads. This material must be excavated, loaded, transported and disposed of through a regional road network that is already narrow, winding, unsealed and constrained.

The figures do not capture the full difficulty of constructing these tracks and tower pads across natural side slopes in steep, high-rainfall country. The work will require extensive cut-and-fill earthworks, rock excavation, drainage, turning and passing areas, and the construction and stabilisation of batters. Persistent rainfall will make exposed surfaces slippery, increase erosion, destabilise earthworks and restrict access by heavy machinery.

EnergyCo has been directed to deliver this project. Its role is to design access tracks, tower pads and construction methods that allow it to say the project can be delivered. It has not been asked to decide whether undertaking earthworks of this magnitude is a reasonable or proportionate way to deliver transmission.

That decision belongs to the NSW Government. These figures should not simply lead to more engineering and a more expensive design. They should trigger a fundamental reassessment of whether this corridor and a project of this scale should proceed at all. Engineering a way to build the project is not the same as demonstrating that it is sensible, affordable or in the public interest.

> Source: EnergyCo, Bulk Corridor Design Refinement Report, July 2025, Tables E-1 and E-3, released under DCCEEW GIPA 50387. [2]

These are quantities from the July 2025 design assessment. EnergyCo must reconcile them with the current EIS design, explain every material change and show where the associated earthworks, spoil movements and access impacts have been assessed. [2]

For the EIS assessment, EnergyCo must resolve the access geometry, tower pads and foundation solutions at difficult sites. This includes terracing, excavation, possible blasting, spoil disposal, waterway crossings, drainage and erosion controls. Wider access formations, cut-and-fill batters or local realignments can increase clearing and disturbance. The final construction solutions must be assessed against the footprint and impacts put forward for approval.



> Figure 6 - **800m West of the transmission centreline, road access, as well as ground conditions, are challenging in winter.**

4 | Helicopter construction

EnergyCo acknowledges that parts of the new corridor may require non-conventional construction methods, including heavy-lift helicopters for tower erection.

The EIS must demonstrate which of the approximately 97 steep-access sites can realistically be reached using conventional equipment, which require helicopter assistance, and how construction will proceed when weather or visibility prevents flying.

Heavy-lift helicopter construction is not a straightforward substitute for road access. It introduces further dependence on specialist aircraft and crews, suitable staging areas, load limits, wind and visibility conditions, aviation approvals and short operating windows. The same high winds, fog, low cloud and fire conditions experienced in the elevated country may prevent helicopter operations when they are most needed.

The reliance on helicopters to overcome inaccessible terrain is further evidence of the project's exceptional complexity and exposure to delay and cost escalation.

If flying cannot proceed, EnergyCo must show whether the response is to wait, change construction methods or construct additional access, and assess the resulting changes in disturbance, traffic, noise and duration.

5 | Bushfire risk

EnergyCo proposes to place critical electricity infrastructure in an area where large bushfires, combined with poor access, are a foreseeable and recurring hazard.

AEMO assigns the New England REZ its highest bushfire hazard rating, "E". The rating uses projected conditions around 2030 and 2050. Its model projections associate more than half the days of the year with high fire-danger conditions and indicate a probability of one large fire occurring in three years.

> Source: AEMO, 2026 Integrated System Plan, Appendix A3, pp. 16 and 21. [3]

Fire risk to construction

The route crosses steep, elevated, heavily vegetated and, in many places, inaccessible country. In these areas, fires cannot necessarily be directly fought by ground crews. They may have to be contained from roads, ridgelines, cleared land or other locations where crews and equipment can operate safely, while fire within the inaccessible country is left to burn.

The proposed transmission lines would pass through country where a fire may continue burning beneath or around the infrastructure because crews cannot safely reach or suppress it directly.

The steep access tracks proposed for tower construction do not remove this constraint. During a bushfire, those tracks may be unsafe or inaccessible because of the fire front, smoke, fallen trees, unstable surfaces or the risk of crews and vehicles being trapped. Access may remain restricted after the fire until trees, tracks, tower sites and electrical infrastructure have been inspected and declared safe.



> Figure 7 - **Fires in Forest Way, under the proposed transmission line - Dec 2019**

Construction would introduce workers, vehicles, earthmoving machinery, generators, fuel storage, welding, grinding and other potential ignition sources across an extensive fire-prone corridor. During periods of high or extreme fire danger, many activities would have to be restricted or stopped.

An active fire near a work front could require workers to evacuate, machinery to be withdrawn and construction to be suspended until the threat had passed and access was considered safe.

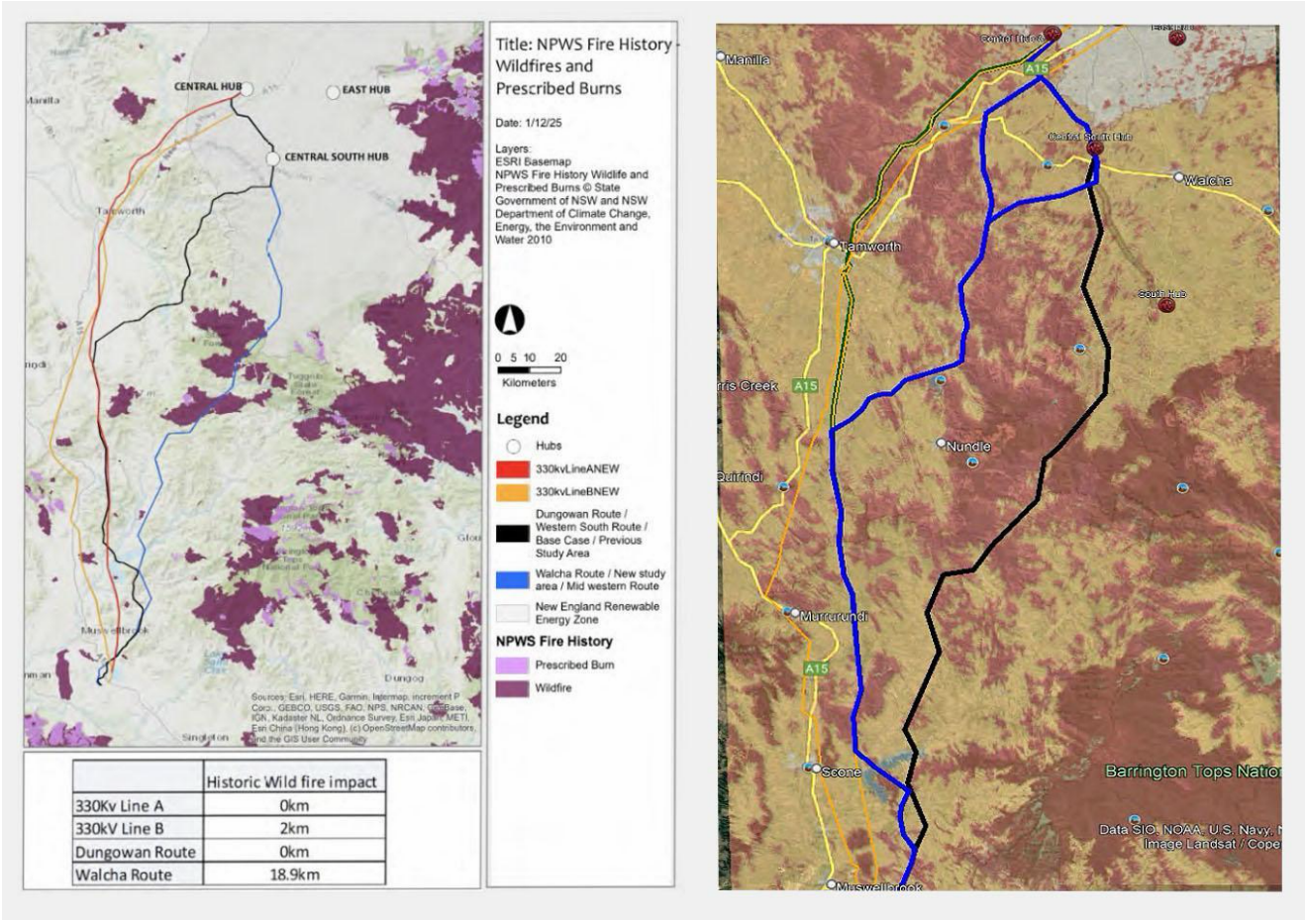
This risk is magnified by the remoteness of many tower sites and the limited routes available for evacuation. Workers could be operating a considerable distance from public roads in terrain where fire behaviour can change quickly and where safe withdrawal of personnel and heavy equipment would take time.

Bushfire is therefore a foreseeable source of lost construction days, interrupted work sequencing, reduced productivity and additional cost. It is also a significant factor increasing the safety risk workers are exposed to. It is another reason to question whether the project can be completed within EnergyCo's anticipated timetable and budget.

Fire risk to the operating transmission system

The issue is not simply whether the infrastructure can be engineered to withstand fire. It is the decision to route 6 GW of critical transmission capacity through country that AEMO gives its highest bushfire-risk rating. In this inaccessible terrain, fires may burn for days or weeks because they cannot be directly attacked, while inspection and repair of affected infrastructure may also be severely delayed.

An extended outage could cut substantial REZ generation off from the NEM and create serious consequences for electricity prices and system security. This is the wrong location for infrastructure on which the wider grid is expected to depend.



Figures 3 and 4 **Left - NPWS fire history, with the Bayswater to Central South Hub easement in blue. Right: certified NSW Bush Fire Prone Land mapping, with the easement in black. Reproduced from the September 2026 Paul Scully meeting brief, p. 11. [1]**

6 | Land access and acquisition risk

The corridor crosses productive, intensively managed agricultural properties. The impact is not limited to the land occupied by towers and access tracks. Transmission lines disrupt paddock layouts, improved pastures, livestock movements and aerial application of fertiliser, seed and agricultural chemicals.

It is a well-known reality that the higher the intensity of agricultural production, the higher the reliance and use of farm inputs. In this steep terrain, the method of application is by air. As a result, these properties depend heavily on aerial agriculture, and the operational impact extends well beyond the easement. Towers and conductors introduce flight hazards, exclusion areas and inefficient flight paths that may permanently change how the property can be managed.

The compensation offered for an easement must therefore be considered against the continuing loss of productivity, flexibility and control over the farming business.

On highly productive properties with substantial investment in pasture improvement and management systems, compensation provides little incentive to accept those permanent constraints.

Opposition along the corridor is not speculative. Affected landholders have organised collectively and have made clear that they will not voluntarily negotiate with EnergyCo. EnergyCo may have the statutory power to compulsorily acquire easements, but that does not make access quick, uncontested or inexpensive.

This is not simply a social licence issue. It is a foreseeable delivery risk involving numerous access disputes, valuations, compulsory acquisitions and potentially contested compensation claims.

Selecting a route that imposes severe and permanent operational impacts on highly productive agricultural businesses makes voluntary agreement highly unlikely and creates substantial risk of delay and escalating acquisition, legal and construction costs.

Resources and construction logistics

EnergyCo's five regional resource studies identify constraints on the facilities, labour, materials and services required to build the REZ. They were published in December 2025 using earlier project and timing information. They provide evidence of delivery risks, but their regional scenarios do not establish this transmission project's requirements or prove that resources have been secured. The current application must reconcile those findings with its own design, construction program and competing regional demand. [4–8]

7 | Waste generation and management

Waste handling is an essential construction task. Clearing, access roads, tower foundations, energy hubs and compounds generate spoil, vegetation, concrete waste, packaging and other materials. Construction depends on having places to reuse, store, process or dispose of those materials when they are produced.

The waste study identifies a specific local constraint: Walcha's landfill has an estimated 40 years of life at current domestic usage, but cannot accommodate significant commercial, industrial or construction waste from the NE REZ. Woolbrook and Nowendoc transfer facilities are restricted to household waste. Across the study area, 41 of the 60 identified facilities are transfer stations, predominantly serving domestic waste needs. Counting facilities or years of domestic landfill life does not demonstrate capacity for this project. [4, pp. 29–30]

The study's generic transmission benchmark is approximately 1,279 tonnes per kilometre over construction, including sewage. It was derived from two other transmission projects and includes substantial soil, concrete and vegetation that may be reused. It is not an annual waste rate, a project-specific forecast or a quantity all requiring landfill. The steep terrain and extensive access works make a project-specific waste and spoil balance essential. [4, pp. 59–60, Table 16]

The July 2025 design evidence identifies approximately one million cubic metres of surplus earthworks and 126,000 spoil-truck movements. EnergyCo must reconcile that earlier estimate with the EIS and show the actual destinations and treatment of surplus material. Reuse needs identified sites, suitable material, available space and lawful access. Material cannot simply be labelled reusable without demonstrating where and when it will be used. [1, p. 9; 2]

Every receiving facility must have capacity for the relevant waste class after existing users and other projects are accounted for. If reuse fails or a facility is unavailable, longer haulage and additional stockpiles can increase road impacts, clearing, runoff, erosion and construction time. These consequences need assessment before determination.

The Consultant, MRA, who created the Waste Management and Circular Economy Study, called for what appears to be a generic solution, that Energy Co has not picked up on. The waste study recommends service agreements during planning and "reverse-logistics" plans in EIS submissions. This is "consultant speak", meaning that EnergyCo must identify how materials, that have come from metro areas to regional areas, must have offcuts, packaging, pallets etc, transported back to metropolitan areas for re-use or recycling.

None of this has been outlined in the EIS.

EnergyCo must demonstrate which arrangements have been secured, which new facilities or upgrades are required, who will fund them and when they will operate. Recommendations for future action do not provide a disposal pathway. [4, pp. 115, 118–119]

8 | Heavy vehicles and truck impacts

The project requires a complete, practicable transport plan covering materials, concrete, water, spoil, waste, wastewater, fuel, workers and oversize and overmass loads. Its scale cannot be understood from a delivery-truck estimate alone. Sources, destinations, road conditions and the daily construction sequence determine how many vehicles must use each road.

The Local Supply Chain Study identifies 1,169 registered prime movers across the study area and models peak REZ demand of 513 delivery trucks. These are fleet numbers for a regional scenario, not daily movements or a demonstrated shortfall requiring 513 new vehicles. The issue for this application is how much suitable fleet capacity is actually available while ordinary agricultural, mining and general freight continue. The study also records shortages of trained, licensed drivers. [5, pp. 37–39, 76–77]

Specialist vehicles for large components are excluded from that prime-mover assessment. Generator connection lines are excluded from the supply-chain model, and non-renewable infrastructure demand is not quantified. Spoil and construction-waste haulage appear under a separate equipment assessment. EnergyCo must reconcile all these tasks, including water and wastewater tankers and empty return journeys, into its project and cumulative traffic assessment. [5, pp. 15, 17, 39, 45]

There is also a transmission-specific discrepancy. The study's input tables show no transmission road-aggregate allowance and no transmission delivery allowance for road aggregates, cement or concrete aggregates. It expressly assumes no batching plant for transmission construction. EnergyCo must explain how those assumptions relate to the access tracks, concrete and batching activities in the current project, and correct any resulting omissions. [5, pp. 111, 113, 118; 10, p. 3]

Unresolved water, equipment and material sources can greatly increase haulage. The study identifies constrained quarry supply and warns that new quarries can take five to ten years to open. For its regional scenario, it estimates about 4.1 million cubic metres of road aggregates across Stages 1 and 2. Its indicative freight cost rises from about $130 million at an assumed 200-kilometre source distance to more than $450 million at 650 kilometres. The practical issue is whether the nominated supplies exist and can be delivered over the assessed routes. [5, pp. 65, 67–68]

Concrete and specialist plant are further constraints. The study records 44 local concrete agitators against modelled REZ peak requirements of up to 285, and 49 mobile cranes against peaks of up to 80. It warns that transmission pulling and tensioning equipment will compete with other NSW REZ projects and may need to be imported. Procurement and mobilisation must be supported by realistic lead times. [5, pp. 44–46]

The EIS must test the combined haulage task against road widths, gradients, bridges, pavement strength, wet-weather restrictions, legal operating hours, school buses, emergency access and existing farm traffic. Road upgrades, maintenance and restoration need identified funding and delivery dates. Longer routes, additional movements or prolonged construction must be assessed before approval, including effects on residents along unsealed roads.

9 | Workforce and accommodation

The current project information identifies a peak workforce of 1,400 and five proposed camps. Listed capacities are 320 beds each at Muswellbrook, Waverly and Barry, and 550 each at Central South Hub and Central Hub A. This totals 2,060 proposed beds across the sites; it does not establish concurrent occupancy. EnergyCo must explain the staging, work fronts and workforce allocations that justify each camp. [9, pp. 2–3]

The regional accommodation study shows why the project cannot assume that the surrounding housing and labour markets will absorb a shortfall. Its cumulative scenario has a peak of 5,474 construction workers. The often-cited total of 7,071 includes 1,597 operational jobs. Temporary accommodation requirements are separately estimated as follows. [6, pp. 8, 75–76, 85]

Study geography	Peak construction workers	Workers needing temporary accommodation
Whole study area	5,474	4,653–5,200
Walcha accommodation catchment	875	744–831
Uralla accommodation catchment	3,071	2,610–2,917

> Source: Workforce Accommodation Study, Tables 10.1 and 11.1. These are cumulative study scenarios, not transmission-only totals. Accommodation catchments differ from LGA boundaries; local peaks need not occur in the same month.

The study found that existing short-term accommodation could meet only a minor share of demand and that camps would be essential. It recorded regional rental vacancy of 1.4% in October 2024 and allowed approximately two years for camp planning, procurement, manufacture and deployment. Existing accommodation stock cannot be counted as vacant rooms available to the project. [6, pp. 7–8]

The study's modelling predates the current corridor and camp arrangements. Its transmission-only scenario estimated about 1,046 temporary workers at peak and allocated only 18 to the Walcha accommodation catchment. Those figures must be reconciled with the current construction program and the 550-bed Central South Hub camp. A cumulative catchment figure cannot be subtracted from one camp's capacity to establish a project accommodation shortfall. [6, p. 119; 9, p. 3]

EnergyCo's October 2026 fact sheet states that the Barry camp and alternative Muswellbrook site were only recently identified and will be fully assessed through the submissions report or amendment report. Full assessment of those locations, their services, access and community effects must be completed and made available for public response before determination. [9, p. 3]

Each camp is itself a construction project requiring water, wastewater treatment, waste services, power, roads and workers before it can house the main workforce. These requirements must be funded, assessed and ready in the correct sequence. If a camp is delayed or its services fail, the resulting construction delay, additional travel or use of local accommodation must also be assessed.

The Training and Skills Study identifies constrained regional labour supply, competition with established industries and shortages of qualified trainers. Training providers need advance notice to expand facilities and recruit staff. EnergyCo must identify the trades and specialist crews required, the recruitment and training arrangements that will supply them, and the time needed to make them available. Local workers already employed elsewhere cannot be treated as additional labour without assessing the consequences for existing businesses. [7, pp. 12–14, 92, 111–114]

10 | Water demand and wastewater

Water is addressed in detail in Section 8 of this submission. It is repeated here because secure supply is a prerequisite for construction. Tower foundations, access works, dust suppression, concrete production and workforce camps cannot proceed on an assumed supply that has not been shown to be available when required.

EnergyCo's current project estimate is approximately 2,400 ML over six years: 2,040 ML of non-potable water and 360 ML of potable water. The October 2026 regional update's 1,913 ML potable total covers the wider modelled REZ over 2027–2035, including the network project. It must not be presented as the transmission project's own potable requirement. [10, pp. 1–3; 11, pp. 5–6]

The regional update also models 98 ML of potable and 305 ML of non-potable demand in Walcha LGA in 2033, a combined 403 ML that year. This is demand from the modelled REZ projects located in that LGA, not a transmission-only figure or proof that the water will be sourced within Walcha. It remains relevant to competition for supplies and transport capacity. [11, pp. 6, 8, Tables 1–2]

The 2025 water study identified treatment constraints. Its broader development scenario put Walcha's average potable demand at 157% of treatment capacity in Stage 1 and 209% in Stage 2. These are earlier scenario results, not current project forecasts. They identify a constraint that must be resolved against updated demand and verified plant capacity. That study assumed no new treatment capacity where approvals, capacity and funding were unconfirmed. [8, pp. 108, 114]

The October update says further work is needed to understand supply shortfalls and expressly does not assess water sources, availability or existing community demand. The project's water fact sheet leaves sourcing arrangements to the Network Operator during detailed design and construction planning. Revised demand estimates therefore do not establish a secure supply. [10, p. 3; 11, pp. 3, 5]

EnergyCo's October update states that each project, including the network project, "must demonstrate secure water supply and assess cumulative impacts before a planning approval can be granted". The Department must require the evidence needed to meet that commitment. [11, p. 14]

That evidence must cover sources, access arrangements, seasonal and drought availability, water quality, treatment, storage and delivery to each work front. If water is imported, the source and haul route must be assessed. If construction must slow or stop to protect existing users, EnergyCo must disclose the thresholds, likely disruption and consequences for the construction program. Harvested rainwater, recycled water or private agreements cannot be counted as secure supply without demonstrating yield, availability and delivery.

Wastewater requires a separate assessment. The 2025 study considered human wastewater under average dry-weather conditions; it did not assess construction wastewater or peak wet-weather loads, and it did not assess water or wastewater network capacity. EnergyCo must demonstrate a workable collection, treatment and disposal system for each camp and compound, including residual sludge, tanker movements and failure contingencies. [8, pp. 61, 121–124]

11 | The combined delivery risk

These constraints interact. Wet weather can delay access tracks and concrete deliveries. Water shortages can require longer tanker journeys. Delayed camps can prevent crews being mobilised. A shortage of quarry material can delay the roads needed to deliver every other input. Waste facilities that cannot accept material can stop excavation or require larger stockpiles and longer haulage.

The current studies do not form one reconciled construction program. They use different project portfolios, dates, geographic boundaries and workforce assumptions. EnergyCo must identify the projects competing for the same resources, update their overlapping construction periods and demonstrate that trucks, workers, beds, water and disposal capacity have not been counted more than once. [4–8]

An integrated program must include investigations, land access, acquisitions, enabling approvals, roadworks, camps, water and waste facilities, specialist procurement and realistic weather allowances. It must show how delays change the duration, location and scale of impacts. A later contractor decision cannot resolve whether an alternative construction method requires impacts beyond those assessed.

Deficiencies

The missing demonstration is a feasible construction pathway within the impacts put forward for approval. The evidence identifies difficult terrain and weather, substantial enabling works and unresolved resource dependencies. Current project information also leaves water sourcing and parts of the accommodation assessment to later stages. [9–11, 13]

Post-approval management plans cannot substitute for evidence needed to assess major construction impacts. Where the eventual solution requires wider tracks, additional clearing, different foundations, new water or waste infrastructure, further road upgrades or a longer construction period, those consequences must be investigated and assessed before determination. The Department must require the project description, impact assessments and mitigation commitments to describe the same deliverable project.

> POSITION SOUGHT

The Department and Planning Minister should not determine the application until EnergyCo has answered the following questions with the required evidence. Each answer must identify the relevant document, assumption, responsible party and delivery date. General assurances, proposed future investigations and statements that a contractor will resolve the issue are not sufficient.

1	**What construction footprint is actually required** Provide a reconciled design and quantity schedule for access tracks, difficult tower pads, foundations, excavation, blasting, drainage, waterway crossings and spoil. Reconcile the July 2025 quantities with the EIS. Demonstrate that the construction methods and necessary contingency works fit within the assessed clearing and disturbance limits.
2	**How many days can construction realistically proceed** Publish the working-day assumptions for each terrain and weather zone, supported by representative local records and site conditions. Include rain, drying time, snow, ice, wind, fog, bushfire restrictions and road closures. Test prolonged wet and dry periods and disclose the resulting construction duration and effects on nearby communities.
3	**Can the difficult sites be built and evacuated safely** Identify sites requiring helicopters, specialist cranes or exceptional access. Provide operating limits, aircraft and crew availability, staging areas and evacuation arrangements. Assess the fallback when flying or road access is unavailable, including additional disturbance, noise, traffic and delays. Resolve the land-access and enabling-work sequence for those sites.
4	**Which facilities have agreed to receive the waste** Provide a waste and spoil balance by material, work area and year. Name receiving and reuse sites, the quantities allocated to this project, lawful acceptance arrangements and capacity remaining after other commitments. Provide operator agreements and assess alternative destinations, stockpile limits and haulage if reuse or disposal arrangements fail.
5	**Where is the complete heavy vehicle movement schedule** Publish one route-by-route schedule covering materials, concrete, water, spoil, solid waste, wastewater, fuel, workers and OSOM loads, with loaded and empty return movements. Reconcile the traffic assessment with the resource studies, including transmission road-aggregate and batching assumptions. Test concurrent projects and realistic source distances.
6	**Who will make the roads ready and pay for their use** Identify all required road, bridge, culvert, intersection, pavement and property-access works. Obtain road-authority input on capacity and operating constraints. Provide funding, delivery dates, maintenance and restoration responsibilities, and assessed controls for dust, noise, school buses, farm traffic and emergency access. Required upgrades must precede the relevant haulage.
7	**Are materials vehicles and specialist plant actually available** Demonstrate available quarry and concrete supply, trucks, licensed drivers, agitators, cranes and transmission equipment after competing commitments are allowed for. Identify procurement lead times and import risks. Where new quarries, batching facilities or other enabling works are needed, assess their impacts and establish a funded, achievable delivery program.

8	**What workforce and accommodation program is the project relying on** Provide monthly workforce numbers by trade, work front and camp. Reconcile the 2025 studies with the current 1,400-worker peak and five proposed camps, including the 550-bed Central South Hub camp. Demonstrate credible local recruitment, training and specialist-crew availability. Do not count existing occupied housing or workers committed elsewhere as spare supply.
9	**Have all camp sites and services been fully assessed** Complete the assessment of Barry, the alternative Muswellbrook site and any other changed accommodation proposal before determination. Assess camp construction, water, sewage, solid waste, power, road access, transport and emergency services at the proposed occupancy. Publish the completed assessments for community response and demonstrate funded delivery before the main workforce arrives.
10	**Where is the secure water supply required before approval** Identify source-by-source volumes, access arrangements, quality, treatment, storage and delivery to each work front and camp. Demonstrate availability during drought alongside existing and cumulative demand. Assess tanker routes and alternative supplies. Explain how the application meets the government's stated requirement to demonstrate secure supply before approval, and disclose the construction reductions or stoppages required if it cannot.
11	**Where will wastewater and treatment residuals go** Quantify human and construction wastewater separately. Identify treatment systems, verified receiving capacity, discharge or reuse arrangements, sludge destinations and tanker movements. Test wet-weather loads, equipment failure and unavailable receiving facilities. Demonstrate that temporary storage and contingencies can operate within the assessed footprint and environmental limits.
12	**What happens when several constraints occur together** Provide an integrated construction and resource program covering land access, approvals, roads, camps, water, waste, workforce and equipment. Test credible combinations of weather disruption and supply failure. Identify who controls staging when projects compete for the same resources, which works must be deferred, and the resulting changes to construction duration and community impacts.
13	**Will the unresolved impacts be assessed before the decision** The Planning Secretary should obtain independent technical review of the integrated construction pathway and expressly address these issues in the assessment report. Require revised EIS material, an amendment report or a preferred infrastructure report where necessary, with public exhibition of material new impacts before determination. Fundamental feasibility and impact questions must not be deferred to post-approval management plans or contractor decisions.

If EnergyCo cannot demonstrate a credible, resourced and sufficiently assessed pathway to construct the project, the Department should not recommend approval and the Minister should refuse the application in its present form.

Source references

Resource-study references use the report's printed page numbers. The opening EnergyCo pages are unnumbered. Current fact-sheet and update references use their displayed page numbers.

[1] Walcha High Country Guardians, New England REZ Transmission Project — Constructability and Generation Delivery Risks, briefing for the Minister for Planning and Public Spaces, 30 September 2026. Part A, pp. 6–12; rainfall appendix, pp. 22–25. Figures in this section are reproduced from that brief.

[2] EnergyCo, Bulk Corridor Design Refinement Report, July 2025, Tables E-1 and E-3, released under DCCEEW GIPA 50387. Historical construction quantities as reproduced in [1], p. 9.

[3] AEMO, 2026 Integrated System Plan, Appendix A3 Renewable Energy Zones, June 2026, pp. 16 and 21. Bushfire score definition and New England scorecard. Source

[4] EnergyCo, New England REZ Waste Management and Circular Economy Study, MRA Consulting Group, published December 2025. Especially pp. 29–30, 59–60, 115 and 118–119.

[5] EnergyCo, New England REZ Local Supply Chain Study, Arup final report June 2025, published December 2025. Especially pp. 15, 17, 37–39, 44–46, 65, 67–68, 76–77, 111, 113 and 118.

[6] EnergyCo, New England REZ Workforce Accommodation Study, published December 2025. Introductory limitations and corridor update; pp. 7–8, 75–76, 85 and 119; Tables 10.1 and 11.1.

[7] EnergyCo, New England REZ Training and Skills Study, published December 2025. Especially pp. 12–14, 92 and 111–114.

[8] EnergyCo, New England REZ Water and Wastewater Security Study, Jacobs, published December 2025. Especially pp. 61, 108, 114 and 121–124; Table 6-3.

[9] EnergyCo, New England REZ Network Infrastructure Project EIS Workforce Accommodation Fact Sheet, October 2026, pp. 2–3. Current workforce, camp capacities and assessment of additional camp sites. Source

[10] EnergyCo, New England REZ Network Infrastructure Project EIS Water Fact Sheet, October 2026, pp. 1–3. Project water demand and deferred source confirmation. Source

[11] NSW Government and EnergyCo, Regional Water Demand Update New England REZ, October 2026, pp. 3, 5–6, 8 and 14; Tables 1–2. Refined regional scenario, assessment limits and pre-approval supply commitment. Source

[12] Environmental Planning and Assessment Act 1979 (NSW), ss. 5.18–5.19; NSW DPHI, State Significant Infrastructure Guidelines, March 2026, pp. 28–29; Preparing an Environmental Impact Statement, March 2026, sections 3.4 and 3.7, pp. 9–10 and 14–15. Source

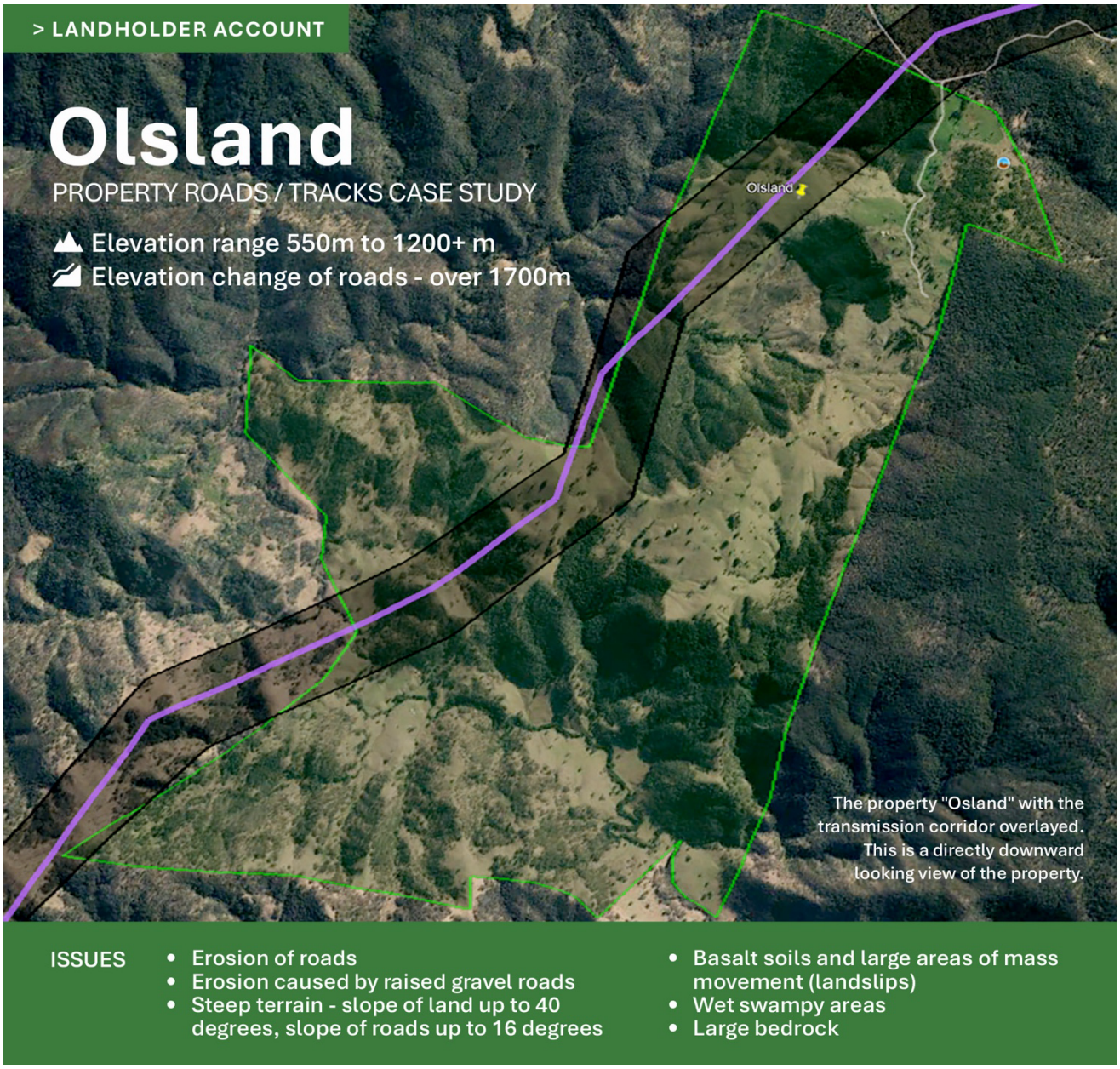
[13] EnergyCo, Environmental Impact Statement for the New England REZ Network Infrastructure Project, accompanying information and frequently asked questions, accessed 2 November 2026. Design and construction-method refinements after exhibition. Source

SECTION 9

Part B - Landholder Case Study Property of “Olsland”

A landholder account of access roads, steep terrain, erosion and construction impacts on the property “Olsland”.

The following account is reproduced as provided by the landholder. The wording, questions and descriptions have not been edited. It is included as local evidence of the practical conditions EnergyCo would encounter when constructing and maintaining access roads and transmission infrastructure through this terrain.



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

About Olsland

Olsland is situated in the upper Manning River catchment with the Northern tablelands to the north and the Hunter River catchment to the south. The topography is dominated by deep gullies, steep hillsides and planning, building and maintaining farm access tracks has always been a challenge.

The proposed transmission lines crosses some of the more remote and topographically challenging parts of the property. There is approximately 5 km of transmission line and 20km plus km of access roads proposed with a elevation change of 1700m.

The Northern one third of the transmission line crosses terrain of escarpment, scree slopes alternating with basalt slopes featuring large areas of mass movement (land slips) with numerous water springs that break out across the landscape.



Figure 1 - "Osland", an angled view, looking east, across the steep landscape, as represented by Google Earth

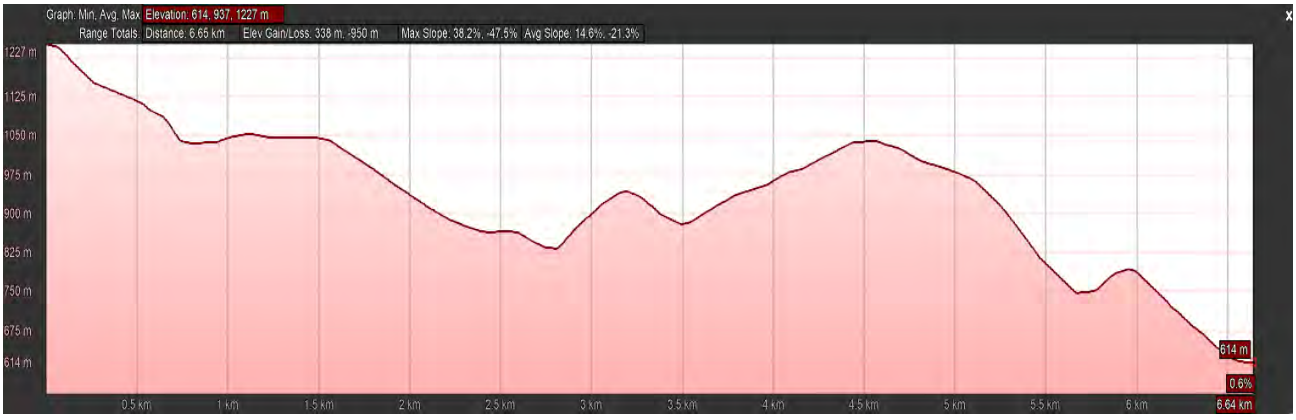


Figure 2 - Profile of transmission corridor across "Osland". Note that the average slope is 14.6%. Max slope is 38.2%.

Our farm track that the transmission line access track is closely aligned to is forced to pass through basalt scree slopes of 30-40 degree slope resulting in road cut heights of 4m+ to achieve a 4.5m track width. There are several tight switchbacks - full lock turning for a toyota landcrusier - and a gradient of up to 16 degrees. Construction of a 10m wide gravel formed road down this track - which is currently a dry weather only basalt soil track- will pose several issues of extreme and excessive nature. it will require road cut heights of 8m+ with greater cut height impact overtime as the initial cut slumps onto the road.

Also many culverts will be required to disperse water flow as this is high rainfall country (1200 - 1600mm per year). This will divert the water from its natural flow creating new areas with high flow of water creating significant erosion issues.

Overtime especially during periods of high and intense rainfall the water movement will erode the imported gravel from the road onto the improved pasture adjacent to the roads, rendering it much less productive and eroding the road where it becomes impassable. This is a constant issue for our roads with steep slopes.

The nature of the basalt soil and rock in this escarpment does not allow for any onsite sourcing of road base material. Given there is approximately 5km of access track in this terrain, approximately 2300 bogey drive truckloads of imported gravel will be required to be sourced and transported onto site to achieve a 10m wide road surface. This will result in a huge disturbance to our quiet farm life which currently has nil movements of such. The disruption to our farming activities will also be significant as stock mustering in this steep and difficult terrain has to occur along these tracks. The question begs, who has right of way to use the tracks? will traffic control be required? Do we have to entirely destock as the access road pathway meanders through more than 80% of our paddocks and are only access tracks.

Water concentration via water drains on the cut side of the tracks and the necessary frequent culverts is the enemy of long term maintenance of these highly erodible steep basalt slopes. Water mitigation as a result of excessive road construction of a very steep gradient will have a huge long
term erosion consequence.



> Figure 3 - **minor cut for farm access tracks can trigger erosion and soil movement. Large cuts could not be considered safe, or responsible.**

What long term effective maintenance of culverts and road pavement is planned to prevent overflow and erosion?

Due to the steep terrain and the soil type, during periods of high wet weather land areas of mass movement (landslips) can cause partial or complete loss of the sections of the road.



> Figure 4 - **Land lip occurring on untouched steep terrain. Major earthworks would trigger multiple and serious landslips in this area.**

The middle section of the transmission line across Olsland is in very steep country. mostly too steep for movement of tracked machines without making continuous pads to operate from. Significant land clearing of large vegetation and removal of that vegetative waste has to occur in this area to construct the roads and transmission lines. The base rock is very shallow to the surface, of sheet nature and nearly impossible to make a pad without explosives. The long term destruction and disturbance to Olsland's natural ecosystems in this area will be devastating. All equipment having to be dragged and winched into location.

On the southern end of Olsland the transmission line crosses the Back River, which at this location is a category 5 order stream. The current farm track goes across the natural gravel bed of the river, which is trafficable by utes when the river is not in flood. What type of crossing is planned that will not cause excessive stream bank erosion? There is significant aquatic life in the river, how is this impact going to be mitigated?

Soil/rock types in this area are based on sandstone, with slopes turning to quagmire conditions in wet times, and other areas of serpentine based rock and soils that are treacherous and unstable in wet times. As with all tracks on Olsland, track gradients are often up to 25+% through topographic necessity. Again gravel will be required to be imported in for large sections of these access tracks.



> Figure 5 - **Steep country in the path of the transmission corridor**

The nearest local council maintained road to this southern section is more than 10 km away and about 500m elevation change, through the neighbouring stations back paddocks. With a gravel road through to the public road, our farm security will be greatly impacted upon.
These conditions and issues are not isolated to our farm and continue into our neighbours for the next 30-60 km or more.

There are at least 25 gateways where proposed road easements intersect with our existing farm fences. The design and suitability such as larger gateways or grids must take in full consideration of Olsland's main long term agricultural activity, that being grazing of sheep and cattle.

Total movement of haulage trucks to facilitate road construction, construction materials and vegetative waste removal will be in the vicinity of 10,000 trucks. Most of that heavy traffic will be using our 1.5km entrance road that gives the only access from our homes at Olsland to the public road of Nundle Forest Way. The impact of this simply cannot be understated.

One of our biggest long term concerns of the transmission line development is erosion impacts on our land adjacent to the transmission line and road access easements. By constructing very steep compacted gravel roads, with many culverts, the concentrated water flow after rainfall events cannot be contained within the easement, with long term detriment to our soil, pasture, productivity and accessibility.



SECTION **9**

Part C - Resource Availability and Supply Chain Constraints

Has EnergyCo demonstrated that the materials, plant, labour, accommodation and disposal capacity required by the construction program will actually be available when and where they are needed?

EXECUTIVE SUMMARY

The New England REZ Network Infrastructure Project is not only a transmission-line project. It is also a major regional civil-construction task that depends on very large quantities of quarry products and concrete, extensive heavy haulage, mobile cranes, earthmoving plant, specialist transmission equipment, a large skilled workforce, temporary accommodation and waste-disposal capacity.

EnergyCo has quantified many of these demands. The central deficiency is that it has not demonstrated, with equivalent detail, that the necessary supply has been secured or will be available in the locations and periods on which the construction program depends.

The EIS estimates that the network infrastructure project alone will require approximately 1.734 million cubic metres of quarry products and approximately 149,850 cubic metres of concrete. Yet the quarry-product source is described only as the Hunter Region and New England, while concrete is described as coming from existing sources, on-site batch plants, or the Hunter and New England regions. The EIS does not identify the supplying quarries and batch plants, available production capacity, committed volumes, competing customers, haul distances or the monthly delivery schedule required by the construction program. [2]

Critically, if supply sources are not identified, then haulage routes are not identified – either by quantity of vehicle movements, or identification of roads used.

EnergyCo's own Regional Major Infrastructure Studies identify the supply constraints. The Local Supply Chain Study concludes that materials output would need to more than double to meet peak REZ demand; existing quarry supply is constrained; new quarries may take five to ten years to open; the local concrete-agitator fleet is far below modelled peak demand; mobile-crane and earthmoving-plant demand can exceed the regional baseline; and specialist transmission pulling and tensioning equipment may need to be sourced from outside the region or overseas. [3]

The Training and Skills Study identifies regional labour shortages during the main construction period. The Workforce Accommodation Study says labour availability is likely to force project staging and allows about two years to plan, procure, manufacture and deploy temporary accommodation. The Waste Management and Circular Economy Study identifies landfills already at or near capacity, including no remaining capacity for additional waste at Walcha. [4-6]

These are not separate constraints. They occur together, and multiply. Quarry expansion requires water, plant, approvals, workers and trucks. Concrete requires aggregates, cement, water, batching plants, agitators and reliable access. Camps require roads, water, sewage, waste services and power. Importing materials from further away increases freight, road impacts, drivers, fuel use, cost and delivery time. A shortage in one resource can delay several other construction activities.

The EIS therefore needs an integrated, resource-loaded construction program demonstrating that the project can be delivered within the construction duration, traffic task, disturbance footprint and other impacts assessed for approval. In the absence of that evidence, the project schedule remains an assumption rather than a demonstrated delivery pathway.

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1 | Issues in the SEARs and assessment requirements that remain unresolved

1.1 The relevant assessment obligation

The amended Planning Secretary's Environmental Assessment Requirements (SEARs), issued on 7 April 2026, require the EIS to assess the likely environmental impacts of the project, including cumulative impacts, identify measures to avoid or minimise impacts, and address material uncertainties. The SEARs also impose topic-specific requirements relevant to construction, including traffic and transport, waste, water and soils, social impacts and construction arrangements. [1]

There is not necessarily a standalone SEAR stating that EnergyCo must prove the capacity of every quarry, crane supplier or trucking company. The deficiency is more fundamental. The environmental and social impacts assessed in the EIS depend on assumptions about where construction inputs will come from, how far they will travel, when they will be available, how many work fronts can operate concurrently and how long construction will last.

If those assumptions are not reliable, or not even present, then the assessed traffic, noise, road deterioration, workforce, accommodation, waste, water, disturbance and construction-duration impacts may also be unreliable.

1.2 Cumulative impacts and uncertainty

The SEARs require cumulative impacts to be assessed. Resource competition is itself a cumulative impact issue because the network project will be constructed in the same regional market as wind, solar, storage, road, mining and other infrastructure projects. EnergyCo's Regional Major Infrastructure Studies were commissioned precisely because project-by-project analysis cannot establish whether regional systems can meet simultaneous demand. [1, 3-6]

Further, as roads are used for transporting bulk materials, conditions of those roads deteriorate, and need maintenance, which requires further resources, trucks, labour, water. On and on it multiplies.

Those studies identify substantial peak demands and several supply constraints, but they use regional scenarios, earlier project lists and assumptions that do not amount to project-specific procurement evidence. Their findings must therefore be reconciled with the current EIS construction program rather than treated as proof that supply exists.

1.3 Why resource availability is a planning issue

Resource availability is relevant to Planning because a shortage can change the physical impacts of construction. A quarry shortfall can increase haul distance and truck numbers. A concrete-supply constraint can require additional mobile batching plants, water, stockpiles and ancillary sites. A shortage of cranes, specialist equipment or workers can reduce concurrent work fronts and extend construction. A delayed camp can increase worker travel or pressure local housing. A waste-capacity shortfall can require larger stockpiles or longer haulage.

These consequences affect the magnitude, location and duration of impacts that the Minister is being asked to approve. They should not be left entirely to future contractor procurement if the resulting solution may materially change the assessed project.

2 | Content of the submission

2.1 EnergyCo has quantified demand but has not demonstrated supply

Table 3.12 of the EIS provides useful project-level quantities for fuel and construction materials. It demonstrates that EnergyCo understands the order of magnitude of the physical inputs required. However, the listed "potential sources" are mostly broad geographic descriptions rather than demonstrated supply arrangements. [2]

Resource / input	Project or regional demand identified	Supply evidence in EnergyCo material	Outstanding constructability issue
Quarry products - network project	1.734 million m^3 total: 1.25m m^3 transmission towers/line; 39,000 m^3 hubs; 445,000 m^3 ancillary infrastructure.	Potential source stated only as "Hunter Region and New England".	No named supplying quarries, available production, committed volumes, extraction limits, haul distances or delivery schedule.
Concrete - network project	149,850 m^3 total: 76,000 m^3 towers/line; 73,000 m^3 hubs; 850 m^3 ancillary infrastructure.	"Existing sources and onsite batch plants" for towers/line; Hunter/New England for hubs and ancillary works.	No project allocation of batching plants, agitators, suppliers, water or production rate.
Road aggregates - wider REZ	About 4.1 million m^3 across Stages 1 and 2.	Regional study assumes local quarry supply for its freight scenario.	Study identifies low existing quarry supply and 5-10 year lead time for new quarries.
Concrete agitators	Regional peak demand 152 / 202 / 285 across Stages 0 / 1 / 2.	Baseline Study Area fleet: 44. Study says surrounding NSW resources likely required.	Registered/estimated fleet is not committed spare capacity; concrete delivery is time-critical.
Mobile cranes	Regional peak demand 77 / 58 / 80.	Baseline Study Area: 49. Adjacent-region supply assumed likely.	Project-specific crane classes, mobilisation, competing commitments and weather/access constraints not demonstrated.
Earthmoving plant	Regional excavator peak 57 / 55 / 95.	Baseline Study Area: 44. Study says local resources may be insufficient.	Access-track, tower-pad, hub and road works depend on plant being available concurrently.
Specialist transmission equipment	Pulling/tensioning equipment required across four major transmission projects.	Study says equipment will likely come from outside Study Area and potentially overseas.	Same specialist equipment is required by multiple NSW REZ transmission programs.
Prime movers / freight	Regional peak model 277 / 277 / 513 prime movers.	Baseline 1,169 registered prime movers in Study Area.	Registration is not spare capacity and specialist vehicles are excluded from the model.
Workforce / key trades	Project peak workforce about 1,400; wider REZ demand much higher.	Training study identifies shortages in electricians, mechanical trades, construction labourers and electrical engineers under peak scenarios.	Skills shortages coincide with peak construction and can force staging or extend duration.
Temporary accommodation	Five camps proposed; regional temporary worker demand in the thousands.	Accommodation study allows about two years for planning/ procurement/ manufacture/ deployment and says labour availability will likely force staging.	Camp delivery and servicing must precede workforce mobilisation.
Waste capacity	Large construction waste/spoil task; earlier design identified about 1m m^3 surplus tower-pad earthworks.	Waste study says many landfills are at/near capacity; Walcha has no capacity for additional waste.	No complete project-specific receiving-site allocation and capacity evidence.

> Sources: EIS Table 3.12; EnergyCo Local Supply Chain Study; Training and Skills Study; Workforce Accommodation Study; Waste Management and Circular Economy Study. [2-6]

2.2 Quarry products and road aggregates

The EIS estimates 1.25 million cubic metres of quarry products for the transmission towers and line, 39,000 cubic metres for the energy hubs and 445,000 cubic metres for ancillary infrastructure. The project total is therefore approximately 1.734 million cubic metres. The only stated potential source is the Hunter Region and New England. [2]

That description does not demonstrate supply. It does not identify the quarry or quarries expected to supply each section of the project; their approved extraction rates; current customers and contractual commitments; product specifications; available annual capacity; production ramp-up; haul routes; or the dates on which material is required at each work front.

The Local Supply Chain Study separately estimates approximately 4.1 million cubic metres of road-aggregate demand across Stages 1 and 2 of the wider REZ program. It estimates road freight of about $130 million under an assumed local-quarry scenario and more than $450 million if equivalent material must be sourced much further away. The study expressly identifies low supply from existing quarries and extensive planning and approvals requirements that can mean new quarries take five to ten years to open. [3]

The issue is made more significant by the transmission model itself. In the Local Supply Chain Study metric table, the road-aggregate quantity for "Transmission, Large (>500 kV)" is shown as a dash, and the road-aggregate delivery metric for that category is also shown as a dash. By contrast, the current EIS separately estimates 1.734 million cubic metres of quarry products for the network project and describes approximately 580 kilometres of access tracks.

EnergyCo should explain whether the regional quarry-capacity assessment omitted or materially understated transmission-specific road-aggregate demand. [2, 3]

The EIS also acknowledges that new access tracks may require imported fill or capping material and that existing tracks may require resurfacing, grading, widening and gradient improvement. The final extent of new and upgraded access works will not be confirmed until detailed design. This means the quarry-product demand may depend on design decisions that are still being refined. [2]

Further, it is not acknowledged in the documentation that where some of the greatest quantity of gravel may be needed, in the steep inaccessible areas of the line between Gundy and Niangala, due to the steep nature of the roads. Neither does it acknowledge that these areas are in basalt soil areas, which is typically unable to yield road building quality gravel, and will require significant freight, along roads that are not conducive to heavy vehicle freighting.

2.3 Concrete, cement and batching capacity

The EIS identifies approximately 149,850 cubic metres of concrete for the project: 76,000 cubic metres for transmission towers and line, 73,000 cubic metres for the energy hubs and 850 cubic metres for ancillary infrastructure. [2]

The regional supply-chain modelling shows that concrete demand peaks at the same time as transmission and major generation construction. At the modelled peak, concrete-aggregate demand reaches about 878 cubic metres per day, raw cement about 683 cubic metres per day and cementitious material about 390 cubic metres per day. [3]

Concrete is also time-sensitive. EnergyCo's consultant notes the delivery constraints under AS 1379 and anticipates that much of the REZ concrete demand will need mobile batching plants located close to construction sites. The study estimates only 44 concrete agitators in the Study Area against modelled peak demand of 152 in Stage 0, 202 in Stage 1 and 285 in Stage 2. It therefore expects resources from elsewhere in NSW to be required. [3]

For the transmission project, the EIS does not identify which batch plant will serve each work front, whether the required mobile plants are committed, the water source for each plant, the aggregate and cement supply, the number of agitators required, or how wet-weather and remote access affect delivery within acceptable concrete-placement timeframes.

2.4 Heavy vehicles and haulage capacity

The Local Supply Chain Study models a peak requirement of 513 prime movers in Stage 2 against a baseline of 1,169 registered prime movers in the Study Area. That comparison does not establish 1,169 units of spare capacity. The registered fleet is already engaged in agriculture, mining, quarrying, construction and general freight. [3] Nore does it acknowledge the concentration of construction focused heavy vehicles in specific areas.

The study itself notes that specialist vehicles for increasingly large project components are not included in its prime-mover analysis and that project-specific procurement may be required. It also assumes road trucking for construction-material demand in order to produce a robust regional estimate. [3]

For this project, the haulage task must bring together quarry products, concrete constituents, concrete, fuel, water, wastewater, spoil, waste, steelwork, conductors, camp supplies and OSOM components. If material sources are further away than assumed, the same resource constraint becomes a traffic and road-capacity issue. The EIS should demonstrate the fleet and driver availability behind its construction schedule rather than relying on the number of registered vehicles in the region.

2.5 Mobile cranes and earthmoving plant

Mobile cranes are critical to the transmission construction program. The Local Supply Chain Study estimates 49 mobile cranes in the Study Area against modelled peak demands of 77 in Stage 0, 58 in Stage 1 and 80 in Stage 2. It concludes that the Study Area may not have sufficient mobile-crane resources and assumes resources from adjacent regions will likely be required. [3]

Earthmoving plant shows the same pattern. The study estimates a baseline of 44 earthwork plant resources against excavator peaks of 57, 55 and 95 across the three stages. It expressly warns that shortages could delay construction and calls for coordination across NSW. [3]

This is particularly relevant to the network project because the exhibited EIS describes approximately 580 kilometres of access tracks, while earlier constructability work identified extensive steep-access construction, complex tower pads and very large earthworks quantities. The plant requirement is not merely a regional statistic; it is a critical input into the sequence required to open work fronts and reach tower sites. [2, 7]

2.6 Specialist transmission equipment

The Local Supply Chain Study identifies specialised pulling and tensioning equipment as a specific transmission constraint. It states that equipment for the four major transmission projects in the New England program will likely need to be sourced from outside the Study Area and potentially overseas. It also notes that the New England program will compete with other NSW REZ transmission projects for the same specialist equipment. [3]

Unlike general plant, this equipment is not readily substituted. Procurement, shipping, mobilisation, crews and the sequencing of stringing operations can therefore affect the critical path. The EIS does not provide evidence that the specialist equipment and crews required by its schedule are reserved or available in the necessary windows.

2.7 Workforce and skills

The project identifies a peak workforce of approximately 1,400. The wider regional studies show that this workforce will be sought from an already tight labour market while multiple projects are competing for similar trades and operators. [4]

The Training and Skills Study projects that, under the maximum development scenario, demand for electricians and mechanical engineering trades workers exceeds regional supply from 2029. It also identifies shortfalls in construction labourers and electrical engineers during the construction peak. [4]

A labour shortage is not simply an employment issue. It can limit the number of concurrent work fronts, increase reliance on fly-in/fly-out or drive-in/drive-out workers, increase accommodation and transport demand, and extend the construction period. EnergyCo should show the workforce assumptions embedded in the project schedule by occupation and work front.

2.8 Workforce accommodation

The Workforce Accommodation Study estimates very large temporary-worker requirements across the wider program and states that labour availability will most likely force project staging to an outcome that can be managed. It also allows about two years for planning, procurement, manufacture and deployment of temporary accommodation. [5]

For the network project, five camps are now proposed. The camps are themselves enabling infrastructure requiring approvals, earthworks, quarry products, water, wastewater, waste services, power, roads and workers before they can accommodate the main construction workforce.

If camp delivery is late, the consequence may be fewer available workers, increased worker travel or greater pressure on local housing. Those outcomes can change both schedule and assessed social impacts. Camp commissioning dates therefore need to be integrated into the construction critical path.

2.9 Waste and disposal capacity

The Waste Management and Circular Economy Study identifies a regional waste system with limited resilience. It reports Armidale landfill operating at full capacity, Uralla at capacity and approaching closure, and Walcha with no remaining capacity to accept additional waste. It also identifies broader constraints in staffing, trucks, equipment and specialist-waste capability. [6]

Earlier constructability work for the transmission corridor identified approximately one million cubic metres of surplus tower-pad earthworks and approximately 126,000 spoil-truck movements. The EIS needs to reconcile those earlier quantities with the current design and demonstrate where material will be reused, processed or disposed of. [7]

If local receiving capacity is unavailable, longer haulage increases the same truck, driver, fuel and road demand already created by imported quarry materials and water. Waste capacity therefore cannot be separated from the overall resource-loaded program.

2.10 The constraints occur together

The most important finding from the resource studies is not any single shortfall. It is that the major demands peak together.

- Quarry and concrete production require water, workers, heavy plant and trucks.
- Mobile batching plants require land, approvals, water, aggregate, cement, power, agitators and access.
- Access roads must be constructed before cranes, agitators and tower components can reach many work fronts.

- Camps must be operating before much of the non-local workforce can be mobilised.
- Waste and spoil must be removed or reused fast enough to avoid stopping excavation and foundation works.
- Specialist transmission equipment must be available when preceding civil works are complete, otherwise work fronts remain idle.

A construction schedule that assumes each resource will be available independently can therefore look feasible while the integrated program is not. EnergyCo's five regional studies use different project portfolios, dates, geographic boundaries and assumptions. They do not form one current, project-specific resource schedule.

2.11 The missing resource-loaded construction program

The missing document is an integrated resource-loaded construction program. It should show, month by month and work front by work front, the quantities and availability of the critical inputs on which the project schedule depends.

At a minimum, it should identify quarry-product volumes and named sources; concrete volumes and batch plants; trucks and specialist haulage; cranes and earthmoving plant; pulling and tensioning equipment; workforce by trade; camp capacity and commissioning dates; waste destinations; water sources; competing projects; procurement lead times; and contingency arrangements.

Without this reconciliation, the EIS demonstrates that resources will be needed, but not that they can all be delivered together within the timetable and impact envelope assessed for approval.

3 | Summary

EnergyCo's own evidence establishes a substantial resource-delivery risk. The network project requires very large volumes of quarry products and concrete, while the wider regional studies identify constrained quarry capacity, shortages or peak deficits in key plant, dependence on resources from outside the region, specialist equipment potentially sourced overseas, labour shortages, long accommodation lead times and constrained waste infrastructure.

Some of the regional studies conclude that demand can be met by scaling local industry or drawing on adjacent NSW, national or international supply. Those statements identify possible responses. They do not demonstrate that the required resource is available to this project at the time, location, specification and quantity required by the construction program.

The distinction is important. A project can be technically buildable in the abstract while still lacking a credible pathway to be built within its proposed schedule and budget assumptions.

If resource shortages lead to longer haulage, new facilities, additional staging, fewer concurrent work fronts or extended construction, the environmental and social impacts can differ materially from those assessed in the EIS.

The Department should therefore require EnergyCo to demonstrate the resource feasibility of the construction program before determination, not leave that task entirely to the future Network Operator and contractors.

4 | Questions and Demands to be addressed before determination

The Department and Planning Minister should require EnergyCo to answer the following questions with project-specific evidence before determination. General statements that supply can be obtained from the region, elsewhere in NSW, interstate or overseas are not sufficient.

1. Where will the 1.734 million cubic metres of quarry products come from?

Identify every quarry or approved project material source expected to supply the network project, the volume allocated from each source, product specification, approved extraction rate, remaining capacity, competing commitments, haul distance, route and delivery period. Demonstrate that the total supply is available when required.

2. Has the regional road-aggregate assessment omitted transmission demand?

Explain why the Local Supply Chain Study shows no road-aggregate quantity or delivery metric for large transmission projects. Reconcile that modelling with the EIS quarry-product requirement and the approximately 580 kilometres of project access tracks. Correct the regional capacity assessment if transmission demand has been omitted or understated.

3. Where is the concrete production plan?

Provide the location and capacity of each existing or mobile batching plant that will supply the project; concrete volumes by work front and month; aggregate, cement and water sources; agitator requirements; delivery-time assumptions; wet-weather contingencies; and the approvals and commissioning dates for new mobile plants.

4. Which trucks and drivers are actually available?

Provide a project-specific heavy-vehicle resource schedule rather than relying on registered vehicle numbers. Identify the fleet required for quarry products, concrete, water, spoil, waste, fuel, steel, conductors and OSOM transport, including loaded and empty return movements, specialist vehicles, driver availability and competing freight tasks.

5. Are the required cranes and earthmoving plant committed?

Identify crane classes, excavators and other critical plant required by work front and construction stage. Demonstrate availability after competing regional and NSW projects are considered, including mobilisation time, ground/access requirements and backup arrangements for breakdown or delay.

6. Where will specialist transmission equipment and crews come from?

Identify the pulling, tensioning, stringing and other specialist transmission equipment and crews required, procurement and shipping lead times, competing Australian projects, committed availability windows and contingencies if imported or interstate equipment is delayed.

7. Is the construction schedule genuinely workforce constrained?

Provide monthly workforce requirements by occupation, contractor and work front. Reconcile those requirements with the Training and Skills Study and identify the proportion to be sourced locally, elsewhere in Australia or internationally. Show how workforce shortages affect the number of concurrent work fronts and total construction duration.

8. Will accommodation be ready before the workforce arrives?

Provide camp approval, procurement, construction, servicing and commissioning dates and show how they align with workforce mobilisation. Identify the consequence for worker travel, local housing and the construction program if any camp is delayed.

9. Where will construction waste and surplus material go?

Provide a waste and spoil balance by material, location and year; identify receiving, recycling and reuse sites; demonstrate licensed capacity after other commitments; and assess alternative destinations, haulage and stockpiling if the primary pathway is unavailable.

10. What projects are competing for the same resources?

Provide a current list of overlapping REZ, transmission, road, mining and other major projects that compete for quarries, concrete, plant, trucks, labour, camps and waste facilities. The cumulative analysis should use current project timing, not outdated regional scenarios.

11. What is the cost and schedule sensitivity if local resources are unavailable?

Test credible scenarios in which quarry products, concrete inputs, plant, specialist equipment, labour or waste capacity must be sourced further away or later than assumed. Quantify the effect on freight, road impacts, enabling infrastructure, construction duration and project cost.

12. Where is the integrated resource-loaded construction program?

Before determination, provide one reconciled program showing the critical resources required by month and work front, primary and contingency sources, procurement lead times, dependencies and schedule float. Demonstrate that the project can be constructed within the duration and impact envelope assessed in the EIS.

13. What happens if that demonstration cannot be made?

Where the resource solution requires materially greater traffic, new quarries or batching facilities, additional ancillary sites, changed construction staging or a longer construction period, require revised assessment and public exhibition as appropriate before determination. Fundamental resource feasibility should not be deferred to post-approval contractor procurement.

If EnergyCo cannot demonstrate that the critical resources are available in the required quantities, locations and timeframes, the Department should not recommend approval of the project in its present form.

Source references

[1] NSW Department of Planning, Housing and Infrastructure, Amended Planning Secretary's Environmental Assessment Requirements, SSI-74175972, 7 April 2026.

[2] EnergyCo, New England Renewable Energy Zone Network Infrastructure Project Environmental Impact Statement, October 2026, especially Chapter 3, including sections 3.3.8 and 3.3.13 and Table 3.12.

[3] EnergyCo, New England Renewable Energy Zone Local Supply Chain Study, Arup final report June 2025, published December 2025, especially materials, transport and plant/equipment sections and appendices containing demand metrics.

[4] EnergyCo, New England REZ Training and Skills Study, Institute for Sustainable Futures / SGS Economics and Planning / DeltaPearl Partners, published December 2025.

[5] EnergyCo, New England REZ Workforce Accommodation Study, Urbis, published December 2025.

[6] EnergyCo, New England REZ Waste Management and Circular Economy Study, MRA Consulting Group, published December 2025.

[7] EnergyCo, Bulk Corridor Design Refinement Report, July 2025, Tables E-1 and E-3, released under DCCEEW GIPA 50387, and constructability material reproduced in the September 2026 ministerial briefing.

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha