

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

This report has been jointly prepared by



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Also known in these document as **Upper Hunter Responsible Infrastructure Group** (UHRIG)



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Rouchel Brook
ACTION GROUP

Walcha High Country Guardians, Protect the Valley*, Rouchel Brook Action Group and **Voice for Walcha jointly object** to this project.

Our four community groups have combined local knowledge, landholder evidence and professional expertise from Walcha, the New England and the Upper Hunter to examine its consequences for the communities, industries and environments along the proposed corridor.

EnergyCo proposes a transmission network with 6 GW of transfer capacity linking New England to the existing grid at Bayswater. It includes approximately 305 kilometres of transmission corridor, five energy hubs, access roads, workforce camps and associated construction facilities. Its full consequences must be assessed together with the generation it is intended to support.





* Please note that in this document, **Protect the Valley** is interchangeable with **Upper Hunter Responsible Infrastructure Group** (UHRIG)



The Environmental Impact Statement (EIS) provides nowhere near enough detail for meaningful public scrutiny or a sound approval decision. Essential surveys, water supplies, construction arrangements, property impacts and safeguards remain incomplete or deferred. Some exhibited designs are already superseded. A promise to resolve these matters after approval cannot substitute for assessment before the decision.



The biodiversity impacts alone justify rejection. Extensive native vegetation clearing, habitat fragmentation and the risk of serious and irreversible harm to threatened species and ecological communities are unacceptable. Incomplete surveys and unresolved offset arrangements provide no sound basis for accepting those losses.



The impacts on agriculture and the Upper Hunter equine industry provide a further decisive ground for rejection. Farm fragmentation, restrictions on aerial operations, erosion, anthrax and other biosecurity risks, and disruption to breeding enterprises threaten productive capacity and business viability. These consequences extend beyond tower sites and easements to whole properties, connected businesses and regional industries.



Water security remains unresolved. The EIS has not established where sufficient, reliable water supplies will come from or how existing users will be protected. If assumed sources prove unavailable, replacement supplies can delay construction, require additional cartage over longer distances, increase road damage and intensify pressure on towns, agriculture and other water users. These consequences must be assessed before approval.



The project must demonstrate an overall net benefit to NSW, accounting for its full financial, environmental and community costs. With households and businesses facing cost of living pressure, value for electricity consumers must be established. Changes (reductions) in the generation pipeline, increasing transmission costs and network assumptions require independent scrutiny, alongside a fair comparison with energy and network alternatives that may deliver greater public benefit at lower cost. Where there are better options, they must be considered.



Constructability must be assessed across the whole project. The EIS has not demonstrated that steep terrain, weather and bushfire restrictions, roads, water, quarry materials, specialist equipment and workforce requirements can be managed together to deliver the project within a credible budget and an acceptable timeframe. Each of these risks can compound and multiply the impact on the other. This accumulation of impacts has not been considered or assessed. Unresolved delivery risks expose communities to prolonged disruption and additional costs.



The submission also identifies serious concerns for cultural and historical heritage, water security, public health, roads, tourism and essential services. The combined demands of the wider REZ, and responsibility for rehabilitation, waste and future liabilities, remain inadequately resolved. Communities and councils must not be left to absorb those consequences.



These impacts cannot be assessed in silos. Agriculture, for example, is exposed simultaneously to water pressures, transport disruption and labour shortages. A failure in any assumed supply of water, materials or workers can delay the whole project and prolong these pressures on businesses, communities and industries. The impacts accumulate and multiply as one constraint worsens another. Their combined harm can exceed the sum of the individual impacts. The assessment must examine these interactions, including how delays extend the duration and severity of disruption.

These are fundamental objections to the project's location, scale, impacts and justification. They cannot be answered by assurances, future management plans or conditions that leave essential questions unresolved.

Taken together, the evidence establishes that **this project should be rejected.**

Key areas highlighted in this document

1 **Strategic Justification and Project Need**
2 **The Risks of an Incomplete EIS**
3 **Biodiversity**
4 **Timor Caves, Barry Karst and Cave-dwelling Bats**
5 **Bushfire Risk**
6 **Aviation: Agriculture, Private and Tourism**
7 **Forestry**
8 **Water Supply, Water Security and Water-Related Environmental Impacts**
9 **Project Constructability Part A - Construction Challenges**
Project Constructability Part B - Case Study - "Osland"
Project Constructability Part C - Resource Availability
10 **Erosion, Sedimentation and Ground Stability**
11 **Impacts on Farming and Farming Practices**
12 **Biosecurity**
13 **Anthrax disturbance**
14 **Traffic and Transport**
15 **Cultural Heritage**
16 **Economic Impact on Regional Industries**
17 **Social and Community Impacts**
18 **Workforce Camps, Energy Hubs and Laydowns**
19 **Waste, Rehabilitation and Long-term Responsibility**
20 **Visual Impacts**
21 **Upper Hunter Equine Critical Industry Cluster**
22 **Historic Heritage**

Appendix **- Deferred Detail Evidence Register**





SECTION 1

Strategic Justification and Project Need

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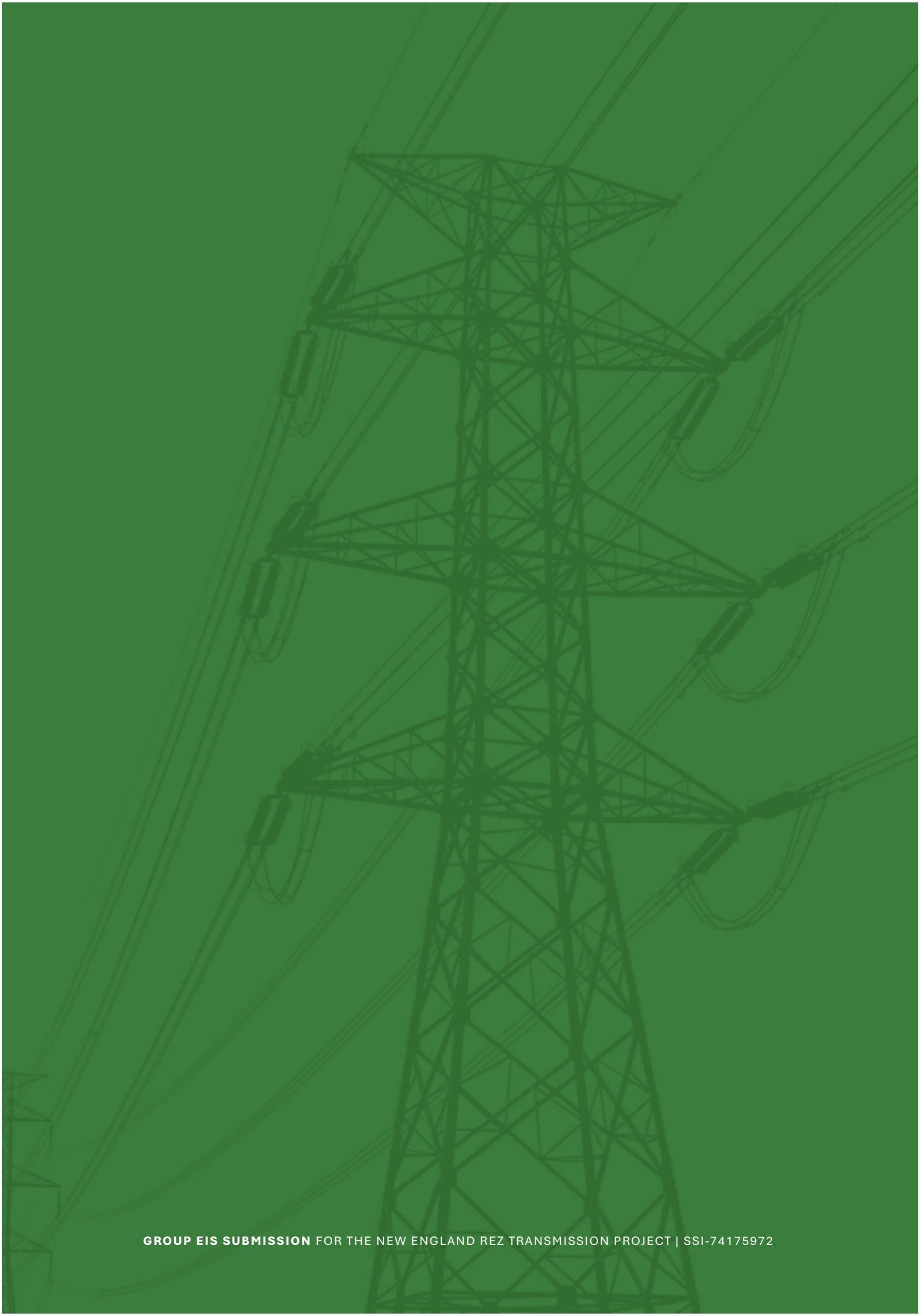

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SECTION 1

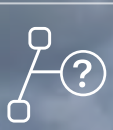
Strategic Justification and Project Need

Key issues we have found ...



Generation commitments remain unproven

Major project withdrawals leave the EIS without a demonstrated pipeline of financed generation and storage to justify the proposed network.



Central South lacks clear justification

Skye Ridge's withdrawal leaves the Central South Hub relying on undisclosed early proposals, with its scale and facilities requiring justification.



Costs and benefits need retesting

Rising transmission costs, changed generation economics and average renewable resources require an updated assessment of the network's costs and benefits.



Retest need after QNI deferral

QNI Connect has been deferred, yet New England's actionability was not retested before anticipated status became part of its justification.



Regional delivery capacity remains unproven

Water, housing, labour, materials and waste capacity remain unresolved across the wider REZ, undermining confidence that promised generation can arrive.



Compare alternatives before committing

Hunter mine land, western renewables and metropolitan solar with storage need fair comparison before approving this network's scale and impacts.

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Read in more detail >



> Image - 400 meters from proposed transmission towers, Forest Way

SECTION **1**

Strategic justification and project need (EIS Sections 2 and 26): can the REZ deliver the generation this transmission depends on?

SUMMARY

The EIS asks the Minister to approve 6 GW of consumer-funded transmission for a renewable energy zone whose generation case has largely fallen away since it was declared in December 2021. The powerline has no benefit in isolation. Its justification depends entirely on enough generation and storage being financed, built and connected in time. The evidence now points the other way, and the EIS does not test this.

1. **Generator interest was speculative.** The interest that shaped the network's scale, hubs and route was largely unfunded. The Walcha Energy portfolio behind the Central South Hub was always fickle and has gone entirely. Despite significant changes in the generator interest, the layout of hubs and subsequent transmission corridor is largely unchanged.
2. **Investors are leaving.** In 2026 Squadron abandoned Boorolong Wind, Origin abandoned Skye Ridge Wind and Alinta abandoned the Oven Mountain pumped hydro project. These were significant projects in the scope of the New England REZ. No major new investor has entered.
3. **The economics have reversed.** Wind's capital-cost premium over solar has grown from 30% to 100%, battery costs keep falling, and the region's flagship pumped hydro project has proved uneconomic. A REZ conceived to supply wind and long-duration storage has lost much of its role.
4. **Transmission costs have soared.** NEM transmission costs have roughly doubled, and Central-West Orana has gone from about $650 million to more than $5.5 billion. The New England line is longer and more complex, yet its cost is unpublished. With fewer generators and an average resource, consumers would pay far more for each unit it delivers.
5. **The wind advantage has gone.** Under AEMO's improved modelling (2026 ISP), New England remains an average (C) wind resource while competing regions have moved ahead of it. Why is the state government pursuing the build of a wind-based REZ in an area where the wind resource is not superior?
6. **The network context has changed.** QNI Connect is now a future project for 2041-42. New England's anticipated status in the 2026 ISP was granted at the Government's request and not retested. The second stage carries no test of whether generation has been financed.
7. **The region cannot yet build the REZ.** The EIS excludes the water, housing, materials and waste needs of the generation projects it depends on, and EnergyCo's own studies show those needs are unresolved.
8. **Alternatives have not been fairly compared.** Generation on rehabilitated Hunter mine land, a developer-backed far west region and metropolitan rooftop solar and storage have not been assessed as alternatives against the New England 6 GW proposal.

The position sought is an updated, independently reviewed justification of the New England REZ before determination. It should show that the scale, timing and configuration of the network are justified by generation that can realistically be delivered now, not by the development once envisaged in 2019.

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1 | Why this belongs in the planning determination

The Secretary's Environmental Assessment Requirements require the EIS to analyse feasible alternatives, assess economic, social and environmental impacts, address uncertainty and evaluate the merits of the project as a whole. The EIS addresses these matters principally in Sections 2 and 26. Section 26.7 (page 842) concludes that "the strategic need and benefits of the project outweigh the mitigated project impacts", and that the project is justified and in the public interest. The generation, cost and delivery assumptions behind that conclusion are therefore part of the application, not background to it.

Importantly, the SEARs, under the heading **Economic**, asks for;

- An assessment of the economic benefits of the project for the region and the State as a whole, ...

No one else in the process is asking the question. EnergyCo's remit is to deliver the 6 GW project, not to ask whether it remains justified at that scale. At a 2025 community meeting, EnergyCo's Deputy Project Director for the New England REZ said that sourcing water for projects was for contractors to work out, and that it was not his job to take such issues to the Minister. In July 2026, Portfolio Committee No. 4 (Report No. 65) found that the REZs had been rolled out without a coherent whole-of-government planning framework, and recommended cumulative assessment across projects before individual projects are assessed.

Approval would also be effectively irreversible. Once easements are acquired, tracks cut and towers built, the impacts cannot be undone if the generation never arrives.

The EIS rests the case for need on claims the current evidence does not support:

What the EIS says	Where in the EIS	What the evidence shows
The project is needed: anticipated in the 2026 ISP, critical in the 2025 Infrastructure Investment Objectives Report, and a 'Deliver Now' project	Sections 2.2.1 (page 19) and 26.1.2 (page 831)	Anticipated status was granted at the Government's request and not retested (section 7)
"Further economic and consumer benefits modelling is being undertaken to assess and support the network infrastructure"	Section 2.1.6 (page 18)	The benefits case the Minister is asked to weigh is not yet complete
Renewables with storage and transmission are the least-cost transition	Sections 2.8.5 (page 60) and 26.1.1 (page 829), citing GenCost 2025-26	The same GenCost report shows wind's premium over solar has doubled; it does not show this New England mix is the best way there (sections 4, 5 and 9)
Hubs are sited near areas of high quality renewable energy resources	Section 3.2.4 (page 78)	AEMO rates the New England's wind and solar resource C, average (section 6)
13 to 15 GW of generation and storage could connect	Section 2.3.2.1 (page 35)	A water-planning scenario only; connecting projects will not be known until 2028 (section 3)
The REZ will attract more than $24 billion of private investment by 2035	Section 24.2.4 (page 815)	Squadron, Origin, Alinta and Copenhagen Infrastructure Partners (Winterbourne Wind project) have all exited (section 3)
About 17 million tonnes of CO2-e a year would be avoided	Section 21 (page 734)	Assumes the network displaces 6 GW of coal running continuously all year, and that the generation is built
A network of about 3 GW was considered and rejected	Section 2.8.4.2 (page 59)	Not compared with the alternative programmes in section 9
Cumulative impacts were assessed	Section 24 (pages 776-785)	Limited to approved or exhibited projects, so most REZ generation is outside it (section 8)

The assessment cannot rely on a fully developed REZ to justify the powerline's impacts while treating the commercial and physical ability to deliver that REZ as someone else's problem.

2 | Generator interest at declaration was largely speculative

EnergyCo records that its 2021 registration of interest attracted 80 registrations representing 34 GW of potential generation and storage. Registrations cost nothing and committed no one. They did not establish secured land, planning approval, access rights, finance or an investment decision, yet they were treated as evidence of a deliverable pipeline and used to set the network's scale and route.

The largest single influence around Walcha was the Walcha Energy concept, promoted from about 2019 as more than 4 GW of wind, solar and pumped hydro on the Walcha plateau. Its promoter had no development track record or capital and had not secured the landholders whose land it mapped. Of the nine Walcha Energy wind and solar projects on AEMO's October 2022 generator register, eight were later removed. The ninth, Ruby Hills, became Origin's Skye Ridge, which Origin abandoned in October 2026. None remains.

Central South Hub. EnergyCo's April 2026 feedback report (page 47) says hub scale would be guided by generation demand, and names Skye Ridge as the only publicly known generation project around Central South hub. With Skye Ridge gone, the hub rests on undisclosed and questionable early-stage interest. A community-compiled map, current at September 2026, also records that most landholders across the Walcha district will not host renewable infrastructure. EIS Section 3.2.4 (page 78) says hub siting "has been based on engagement with generators". Table 3.2 (pages 78-82) gives Central South three 1,500 MVA transformers and a 330 kV switchyard for generator connections, as well as its 500 kV links to Central Hub A and Bayswater.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Reconcile the projects that informed the original network design with those now expected to proceed, identifying withdrawals, replacements, changes in size and location, and the strength of investor commitment behind each; and
- Show which Central South Hub facilities are still needed following the withdrawal of Skye Ridge, at what scale, and why they cannot be deferred.

3 | Investor-backed interest is thin and shrinking

Generator interest and investor interest are not the same thing. Developers are rewarded for promoting the size of a pipeline; financiers decide what is built. In 2026 three of the largest projects in and around the NE REZ were abandoned:

Project	Size	What Happened
Boorolong Wind Farm, Armidale	Up to 426 MW	Squadron Energy ended development on 15 July 2026 after a pipeline review, along with its Guyra proposal.
Skye Ridge Wind Farm, Walcha	Up to 870 MW	Origin Energy exited in early October 2026, saying wind construction costs were about 50% higher than in 2020 and that this had changed the economics of progressing this project.
Oven Mountain Pumped Hydro, between Armidale and Kempsey	900 MW, 7,200 MWh (8 hours)	Alinta Energy discontinued the $1.8 billion project on 22 October 2026, citing economic and timing challenges. It had been declared Critical State Significant Infrastructure and received a $10 million NSW Government grant

Boorolong and Skye Ridge together represented 1,296 MW of wind. Oven Mountain was the most advanced pumped hydro project in NSW and the clearest example of the long-duration storage the New England was meant to supply. Elsewhere, Copenhagen Infrastructure Partners reversed its acquisition of Winterbourne Wind in 2025, returning it to turbine maker Vestas. Thunderbolt (approved May 2024, with Commonwealth revenue underwriting) and Hills of Gold (approved September 2024) have announced no financial close. No wind farm has been built in the New England in more than t8 years.

The question remains as to whether a large, credible, well-located replacement pipeline exists. The EIS does not show one. EIS Section 2.3.2.1 (page 35) uses a 13 to 15 GW generation and storage scenario for regional water planning, but acknowledges that the connecting projects will not be known until access rights are allocated in 2028. EnergyCo expects generators to start building after the network, so **the Minister is being asked to approve the powerline before a single connecting project has been identified, let alone financed.**

The EIS's claim (Section 24.2.4, page 815) that the REZ will attract more than $24 billion in private investment by 2035 cannot be reconciled with these exits.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Separate early-stage proposals from projects with secured sites, approvals, access arrangements and committed capital; and
- Test the project's benefits if generation arrives later or in smaller quantities than assumed, and identify which transmission components could then be reduced or deferred.

4 | The economics of a wind and pumped hydro REZ have reversed

The New England REZ was promoted as a wind-led zone with strong pumped hydro potential. Its role was to complement solar-dominant zones by supplying wind generation and long-duration storage when solar could not. That role depended on wind and pumped hydro being cost-competitive. CSIRO's GenCost data shows they no longer are:

Capital Cost	GenCost 2020-21 (2020 estimate)	GenCost 2025-26 (2025 estimate)
Onshore wind	**$1,951/kW**	**$3,248/kW**
Large-scale solar PV	**$1,505/kW**	**$1,621/kW**
Wind cost relative to solar	**about 1.3 times**	**about 2.0 times**
Two-hour battery (total cost)	**$529/kWh**	**$525/kWh**

> Sources: GenCost 2020-21, Appendix Tables B.1 and B.4; GenCost 2025-26, Appendix Tables B.4 and B.9. Each figure is in its own publication's dollars.

Wind's capital-cost premium over solar has grown from about 30% to about 100%. GenCost 2025-26 also reports real battery cost reductions of 20% and 15% in its two most recent annual updates, which is why private capital is moving to solar firmed by batteries. Origin's Skye Ridge decision is this shift playing out in the REZ.

Pumped hydro has gone the same way. AEMO's 2026 ISP inputs reflect higher pumped hydro costs, and Oven Mountain, after years of technical work and planning, could not proceed economically. Identified pumped hydro potential can no longer be treated as deliverable storage.

EIS Sections 2.8.5 (page 60) and 26.1.1 (page 829) rely on GenCost 2025-26 for the general finding that renewables with storage and transmission are the least-cost path. That is the same report that shows wind's premium over solar has doubled. It does not show that this wind and pumped hydro REZ, at today's costs, is the best way to get there.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- provide an updated generation and storage case, at current GenCost costs, showing that the technologies expected to use the network remain commercially credible following the withdrawals of Skye Ridge and Oven Mountain; and
- show that this mix can provide the energy and firming required, including long-duration storage now that the REZ's most advanced pumped hydro project has gone.

5 | Transmission costs have soared, and a long line no longer adds up on old assumptions

Transmission costs had soared further, and the REZ with the longest transmission link loses. This is the New England REZ – with the greatest length of transmission of all the Renewable Energy Zones.

The New England REZ was declared in 2021 on transmission costs that no longer apply. Since then the cost of building transmission in the NEM has roughly doubled, and a REZ that depends on a long new line is correspondingly less economic:

Measure	Earlier Estimates	Current Estimates
AEMO network cost estimates (after inflation)	2024 ISP inputs	Up to about 100% higher in AEMO's 2025 Electricity Network Options Report
VNI West (Victoria to NSW)	About $3.9 billion (2024 ISP)	$7.0 billion (AEMO) to $7.6 billion (proponents), 2025
Central-West Orana REZ transmission	About $650 million at declaration (2021)	More than $5.5 billion (2025)
Western Renewables Link (Victoria)	About $370 million	More than $3 billion
New England REZ transmission	Not published	Not published

> Sources: Renew Economy reporting of AEMO's 2025 Electricity Network Options Report (31 July 2025) and the AER's Central-West Orana determination (6 August 2025); Walcha High Country Guardians briefing to Minister Scully, September 2026.

New England is a bigger job than Central-West Orana: about 305 km against 240 km, with about 290 km of 500 kV line against about 90 km. Yet the EIS publishes no capital cost, and the AER revenue determination comes only after approval. This is catastrophically cart before the horse.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- publish a current capital cost estimate for the full network, broken down by stage and major component;
- show the network cost per megawatt-hour of generation delivered under realistic generation, timing and capacity-factor scenarios, compared with options using existing transmission (section 9); and
- identify which components could be reduced or deferred if costs rise further or generation falls short.

6 | The New England's wind advantage has gone

At declaration, the New England was presented by one of the speculating developers (Walcha Energy) as one of the best wind resources in the country, and that belief underpinned both the zone's location and the scale of transmission planned for it. The EIS still says the energy hubs are sited "in proximity to areas of high quality renewable energy resources such as wind and solar" (Section 3.2.4, page 78).

For the 2026 ISP, AEMO rebuilt its wind assessment using the Bureau of Meteorology's BARRA2 dataset, a 150 metre turbine hub height and an updated model for converting wind into output. Its March 2026 Draft ISP Addendum (page 15) reports higher estimated capacity factors for many REZ's, particularly in southern NSW and South Australia. The New England did not improve. Its grade stayed at C, meaning an average capacity factor of at least 35% but below 40%, while competing regions moved past it:

NSW Region	2024 ISP wind grade	2026 ISP wind grade
New England	**C**	**C**
Broken Hill	D	B
South West NSW	E	C
Hunter Coast	Not rated	A
Illawarra Coast	B	B

> Source: AEMO ISP Appendix A3 scorecards, 2024 and 2026.

Twenty other REZs across the NEM now rate higher than the New England for wind, three of them in NSW. Its solar resource is also rated C. The claim that the New England has a distinctive resource advantage worth major new transmission no longer holds weight.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Correct the resource claims in the EIS (including Section 3.2.4) to reflect AEMO's 2026 wind and solar ratings; and
- Show, against a current comparison with other regions, that the New England's resource is valuable enough to outweigh the cost and impacts of the significant transmission needed to reach it.

7 | The network context has changed, and the safeguards have gone

QNI Connect is now a future project. The New England network was conceived as part of a wider spine, with its northern end linking to QNI Connect, a new NSW to Queensland interconnector. The final 2026 ISP reclassified QNI Connect as a future project, with optimal timing of 2041-42 under Step Change.

AEMO's own testing shows how much this matters. The Draft 2026 ISP (Appendix A6, pages 66-67 and Table 26) modelled New England with QNI Connect fixed as non-actionable:

Scenario	Effect of delivering New England later
Slower Growth	Net market benefits up about $1,038 million; New England not needed within the forecast horizon
Step Change	Deferral to 2038-39 increased net market benefits by about $146 million
Accelerated Transition	Earlier delivery preferred, by about $432 million
Weighted result	Later delivery increased weighted net market benefits by about $231 million

> Source: AEMO ISP Appendix A3 scorecards, 2024 and 2026.

These are draft results, and AEMO's regret measure favoured earlier delivery to guard against underinvestment in the fastest scenario. But they show the project's timing and value are highly sensitive to demand and to the wider network.

Anticipated status was never retested. Following a request from the Minister for Energy in May 2026, the final 2026 ISP treated New England as anticipated, and AEMO states that its actionability was consequently not retested. The EIS then presents that classification as evidence of need (Sections 2.2.1, page 19, and 26.1.2, page 831), and uses it to dismiss the 'do nothing' option (Section 2.8.1, page 57). **A status granted on the Government's advice, without independent testing, cannot also serve as independent proof that the project is needed.**

The design is contracting, but the capacity is not. EnergyCo deferred the south hub in January 2024 and the northern connection beyond the north hub in August 2026. Each reflects weaker demand for the network, yet the 6 GW sought has not changed.

Staging no longer protects consumers. The original plan was 2.4 GW first, with a further 3.6 GW once generator commitments were proven, giving the State a point at which to stop if generation did not materialise. The EIS (Table 3.1, page 66) still describes two stages, but only as energisation dates within one six-year construction program starting in 2028: 2.4 GW in 2032 and a further 3.6 GW in 2034. Approval is sought for the full 6 GW now, and nothing makes the second stage conditional on financed generation. Central-West Orana, by contrast, entered delivery with access rights already allocated above its initial 4.5 GW.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Explain New England's role, capacity and benefits without QNI Connect, retested independently of its anticipated status in the 2026 ISP; and
- Replace the fixed 2032 and 2034 energisation dates with a staging gate, so that the second stage proceeds only once financed generation is committed to use it.

8 | The region cannot yet build the REZ, and the EIS does not assess it

The powerline delivers nothing unless the region can also build the generation and storage that will use it. The EIS assesses only the transmission project's own needs. EnergyCo's guide to the EIS confirms that it does not assess the water needs of the solar and wind projects planned for the REZ, leaving each to its own EIS, even though they will draw on the same towns, water, roads and housing at the same time.

The EIS does summarise EnergyCo's five Regional Major Infrastructure Studies (December 2025) in Table 2.3 (pages 32-34). Each identifies a constraint with no confirmed solution:

Requirements	What EIS Table 2.3 records	Question still unanswered
Workforce accommodation	Up to 4,800 non-local workers needing accommodation at peak REZ construction	Where will they live, when, and who funds the services? Rental vacancy was 1.2% in Uralla and 1.7% in Walcha in September 2024
Water and wastewater	Increased demand, potentially needing additional treatment infrastructure	Are reliable supply and treatment available in the right places and on time?
Workforce and skills	Limited workforce capacity and low unemployment	What workforce can be secured across overlapping projects?
Waste	Existing capacity potentially insufficient without upgrades	Which facilities will accept the waste, with what approvals and capacity?
Materials and equipment	Demand rises significantly; specialist skills and equipment must come from outside the region, and smaller businesses may need support	Can quarries, plant and transport be in place before demand peaks?

Water shows the gap between estimating demand and securing supply. The transmission project alone needs about 2,400 ML during construction (360 ML potable and 2,040 ML non-potable; EIS Table 3.1, page 66, and Section 3.3.13.1), and the EIS offers a sourcing hierarchy rather than confirmed sources. For the wider REZ, EnergyCo and DCCEEW's October 2026 regional water demand update lowers estimated demand to about 7,318 ML over 2027 to 2035, mainly by modelling 35 projects instead of 114 and stretching the timeline by three years. By its own account, the update estimates demand only. It does not assess sources, availability or other users, excludes pumped hydro, and defers proposed water initiatives to 2027. NSW Public Works has advised that large volumes of reliable water are harder to obtain on the Tablelands, where catchments are small and groundwater sits in unreliable fractured-rock aquifers.

The same update states that each project, including the network itself, must "demonstrate secure water supply and assess cumulative impacts before a planning approval". On the exhibited material, neither has been done. EIS Section 24 includes only projects already approved or on exhibition (Tables 24.1 and 24.2, page 778), which leaves out most of the 13 to 15 GW the network depends on. Its list of relevant projects is also already out of date: Table 24.3 (page 785) has Oven Mountain starting construction in mid-2027, although Alinta abandoned it a week after exhibition began. Section 24.1 (page 777) says its assumptions, including water demand, are "not directly comparable" with the Regional Major Infrastructure Studies. The lines connecting generators to the hubs are not assessed at all.

These constraints compound. Workers need housing; housing needs water, wastewater and roads; concrete needs water, quarries and trucks. Leaving each developer to find its own supply does not show that their combined demands can be met.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- provide a funded, sequenced regional delivery plan identifying critical facilities (water, wastewater, housing, quarries, roads and waste), responsible providers, approvals and completion dates, using the same development programme as the benefits case;
- demonstrate secure water supply for the network and the generation it depends on, identifying sources, volumes and transport; and
- expand EIS Section 24 to assess the transmission together with that generation and the connection assets not yet assessed.

9 | Credible alternatives must be compared before approval

The choice is not between this project and no energy transition. EIS Section 2.8 considers five options: do nothing, using or upgrading existing lines, undergrounding, the project, and "alternative power sources", which it limits to coal, nuclear and offshore wind (pages 57-60). Section 2.8.4.2 (page 59) rejects a network of about 3 GW because of an expected supply shortfall and higher replacement costs. None of these options compares the proposal with renewable generation in other locations, or with distributed solar and storage. They need not replace the whole REZ to matter: a combination that reduces the network's scale, changes its timing or avoids particular infrastructure could change the planning balance.

The comparison is more pressing because transmission has become much more expensive. As section 5 shows, a remote resource must now deliver far more system value to justify the network needed to reach it. That test applies to New England as much as to any alternative.

Already disturbed land in the Hunter Valley

Around 200,000 hectares of mined and degraded land surrounds the Bayswater and former Liddell power stations, historically the largest generation hub in Australia. It may be the quickest place in NSW to build large-scale solar and storage next to existing infrastructure:

- Transmission exists. Lines to Sydney and Newcastle are in place and being upgraded. AGL owns the immediate 10,000 hectares.
- Few landowners and few people affected. Much of the land is held by a few mining companies with rehabilitation obligations to the State, which could be varied so that renewable generation forms part of rehabilitation.
- Adequate resource. Solar is similar to the New England; wind is reasonable.
- Workforce and logistics in place. A skilled local workforce without camps or fly-in fly-out labour, near Newcastle port, with continuity of work as mining declines.
- Load nearby. The Tomago smelter, the State's largest single electricity user, is close by.
- Access roads in place already. Haulage roads already exist, reducing the cost and timeline for access to project sites.

There is already a precedent. In August 2026 EnergyCo announced construction of the 135 MW Muswellbrook Solar Farm and 100 MW battery on a former coal mine site, citing the benefits of using existing Hunter-Central Coast infrastructure. The Bayswater and Liddell precinct could also host data centres powered by local renewables and cooled from Lake Liddell, and PFAS-affected land at Williamtown could host solar and storage near Tomago. A coordinated assessment should identify suitable land, connection capacity, upgrades and timing, including rehabilitation, contamination and ground-stability constraints.

A far west inland renewable region

In February 2026 a consortium of six developers (Tilt Renewables, Iberdrola Australia, Acciona Energía, Ark Energy, Squadron Energy and Voyager Renewables) proposed to AEMO an inland renewable region in western and far west NSW, of about 3 to 4 GW by 2035 and at least 6 GW by 2040, subject to enabling transmission. AEMO rates Broken Hill B for wind and A for solar. Land is sparsely settled, landholder resistance is low, and the proposal has the developer backing the New England pipeline has lost.

The consortium of developers state;

> *"Existing [zones] are constrained by social license, land use and housing capacity limitations, while offshore wind faces high costs and long lead times. These factors underscore the need to unlock inland regions with strong fundamentals and lower development barriers"*

AEMO did not select western options in the 2026 ISP because of their transmission costs, while noting scope to refine those estimates. Any comparison must address that. The point is that both options should face the same current scrutiny of cost, commitment, land, resources and timing.

Metropolitan rooftop solar and coordinated batteries

Generation and storage close to where electricity is used need little new transmission. In June 2026 the NSW Opposition proposed City Renewable Energy Zones in Sydney, Newcastle and Wollongong, and the Government's $557 million Home Energy Saver program funds rooftop solar and home batteries. AEMO's 2026 ISP demand-side work (Appendix A9) also recognises that coordinated consumer resources and distribution investment can reduce the need for other generation, storage and transmission. The comparison must count only deployment additional to current forecasts, and allow for evening and winter supply, storage duration and distribution limits.

Comparing like with like

Test	New England (As proposed)	A. Hunter mine land	B. Far west	C. Metropolitan rooftop
New transmission	6 GW greenfield network	Little; existing lines	Yes, long distance	Minimal
Investor backing	Major exits in 2026	Precedent at Muswellbrook	Six-developer consortium	Household and business uptake
Resource (wind / solar, AEMO)	C / C	Reasonable / similar to NE	B / A (Broken Hill)	Solar only
Landholders affected	Many, largely unwilling	Few, mostly mining companies	Few	None
Workforce and housing	Imported; camps needed	Local, skilled	Mining workforce	Existing trades

Each option should be assessed against the same electricity, reliability and emissions objectives, delivery dates and statutory targets, including public cost, consumer cost, delivery risk and environmental impact.

Conclusion

Every assumption that justified a 6 GW network through the New England has weakened since 2021. The speculative pipeline has gone, major investors and the region's flagship pumped hydro project have left, wind and pumped hydro have lost their cost advantage, the wind resource is average, QNI Connect is deferred beyond 2040, and the second stage has no generation gate. The region cannot yet supply the water, housing and materials the REZ would need, and better-suited alternatives have not been compared.

These are not matters conditions of approval can fix. They go to whether the project is needed at this scale and whether its benefits will ever outweigh its impacts. The central gap is between the benefits attributed to a fully developed REZ and the evidence that it can be delivered.

> POSITION SOUGHT

The Department should not recommend determination until EnergyCo has done the following, and the results have been published and exhibited for comment.

Strategic justification

- Commission an independent, third-party reassessment of the project's scale, timing, configuration, cost and supporting generation, and revise EIS Sections 2 and 26 in light of it, including each claim in the table in section 1.
- Use the Estimated Development Cost supplied to the Department to test the benefits under current generation and delivery scenarios, including higher construction cost and lower or later generation uptake, and publish the results.
- Retest the project's need and consumer benefit without QNI Connect and without relying on its anticipated status in the 2026 ISP. Where any Consumer Trustee or system-planning assessment is relied on, explain what it actually tested and whether it addresses the changes raised here.

Generation deliverability

- Reconcile the projects that informed the original network design with those now expected to proceed, and identify by hub the committed and financed generation and storage against the 13 to 15 GW scenario in EIS Section 2.3.2.1.
- Explain which Central South Hub facilities remain necessary following the withdrawal of Skye Ridge, and why they cannot be deferred.
- Show that the expected generation and storage mix is commercially viable at current GenCost costs, following the loss of Oven Mountain, and that sufficient land is available from willing hosts.

Regional capacity

- Add to the EIS a funded, drought-secure water supply plan for constructing the generation needed to fill the network, identifying sources (that have known deliverability), volumes and transport.
- Expand the cumulative assessment in EIS Section 24 to cover the transmission together with the generation it depends on and the connection assets not yet assessed, including housing, roads, materials, waste and emergency services.

Alternatives

- Assess, with costs and against consistent objectives, the three alternatives in section 9 and a reduced-scale and genuinely staged New England network.

If any approval is contemplated

- Limit it to a first stage sized to financed generation, with a binding gate before any further stage tied to financial close of real generation projects.

Sources

The EIS and EnergyCo material

EnergyCo, New England REZ Network Infrastructure Project EIS (SSI-74175972), October 2026: Sections 2.1.6, 2.2.1, 2.3.2.1 (with Table 2.3) and 2.8; Section 3.2.4 and Tables 3.1 and 3.2; Sections 3.3.13.1, 21, 24 (including Tables 24.1 to 24.3 and Section 24.2.4) and 26 (including 26.1 and 26.7), via the NSW Planning Portal

EnergyCo, Your guide to the environmental impact statement, October 2026

EnergyCo, Project overview, October 2026

EnergyCo and DCCEEW, New England REZ regional water demand update, October 2026

EnergyCo, Feedback report, April 2026, page 47

EnergyCo, New England REZ frequently asked questions

EnergyCo, New England Regional Major Infrastructure Studies, December 2025

EnergyCo, Construction begins on Hunter-Central Coast REZ solar farm and battery, August 2026

Market operator, regulator and CSIRO

AEMO, 2026 Integrated System Plan, including Appendix A3 and Appendix A9

AEMO, Draft 2026 ISP Appendix A6, Cost benefit analysis

AEMO, Addendum to the Draft 2026 ISP, March 2026

AEMO, 2026 ISP Consultation Summary Report, June 2026

Acciona Energía and partners, submission to the Draft 2026 ISP, February 2026

AusNet Services, Deliverability Strategy, lodged with the AER, November 2025

CSIRO, GenCost 2020-21 and GenCost 2025-26

Project withdrawals and policy

Squadron Energy, Update on Boorolong Wind Farm, July 2026

New England Times, Origin walks away from Skye Ridge, October 2026

Oven Mountain Pumped Hydro project website, October 2026

NSW Liberals and Nationals, energy policy, June 2026

NSW Legislative Council Portfolio Committee No. 4, *Impact of Renewable Energy Zones on Rural and Regional Communities and Industries in New South Wales*, Report No. 65, July 2026

Correspondence from Jennifer Blaikie, NSW Public Works

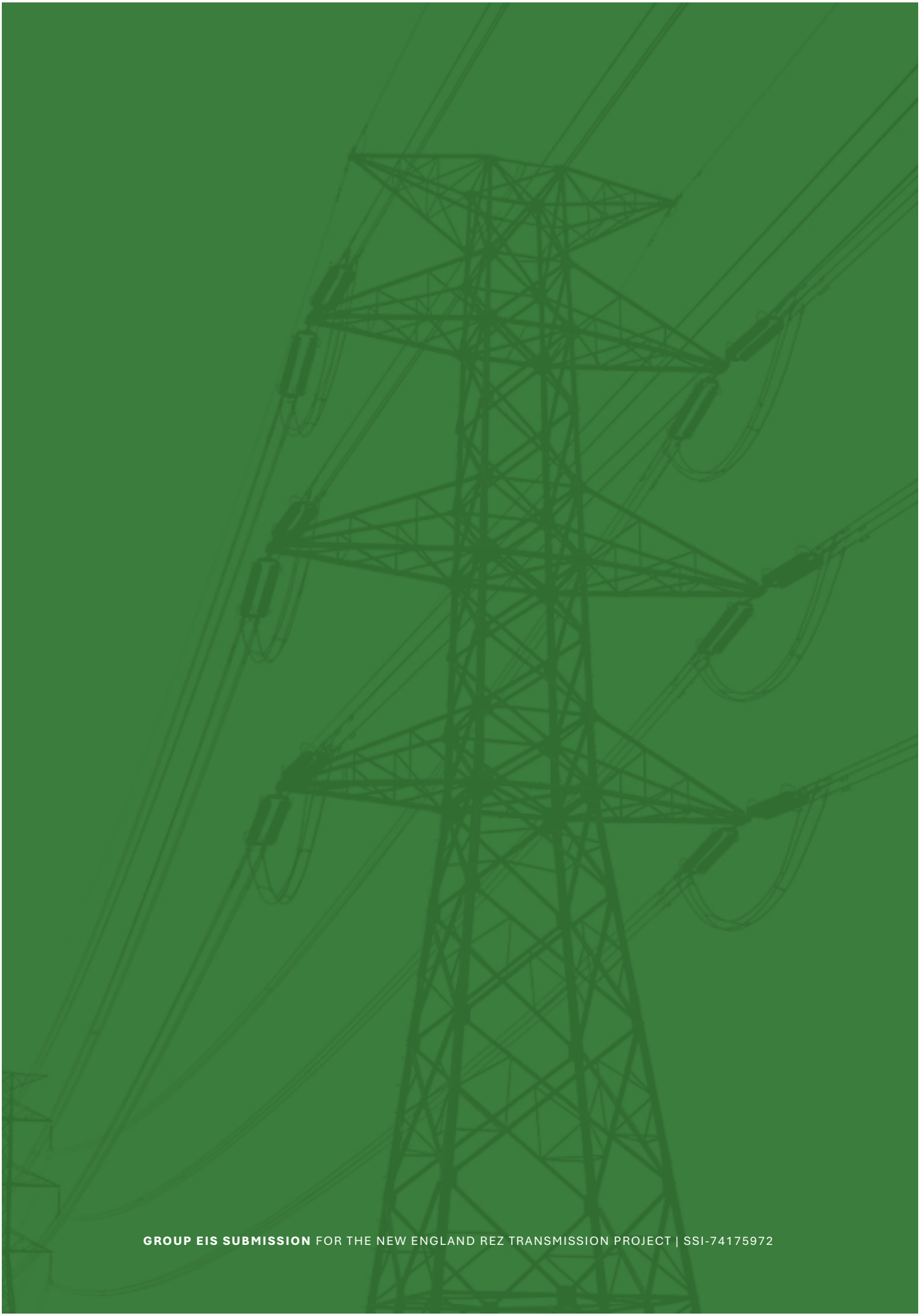
Correspondence on Hunter Valley alternatives from [name, credentials]

Walcha High Country Guardians, briefing to Minister Scully, September 2026; Voice for Walcha, *Re-assess the New England REZ*, 2026

SECTION 2

The Risks of an Incomplete EIS

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



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

SECTION 2

The Risks of an Incomplete EIS

Key issues we have found ...



Promises are not protection

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



Essential assessment cannot be deferred

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



Closed complaints can leave problems

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



Shared impacts need coordinated decisions

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



Exhibited maps are already outdated

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



Complete assessment before granting approval

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

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

Read in more detail >



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

SECTION **2**

The risks of an incomplete EIS

EXECUTIVE SUMMARY

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

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

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

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

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

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

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1 | What the evidence demonstrates

Three distinctions are central.

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

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

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

Decision requested

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

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

2 | How deferred decisions can leave the community without protection

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

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

The distinction between later engineering and missing assessment

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

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

What we mean by a failure of process

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

Scope of this section

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

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

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

3 | Evidence standards and approval obligations

Three categories must remain distinct:

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

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

Relevant determination conditions

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

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

Which versions are compared

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

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

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

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

4 | SIMP promises compared with inquiry findings

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

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

5 | Evidence of implementation and monitoring failures

CWO - CASE STUDY 01
Known Aboriginal heritage protection failed

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

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

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

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

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

> POSITION SOUGHT

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

Why this matters beyond heritage

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

Press and public advocacy corroboration

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

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

CWO - CASE STUDY 02

Published SIMP results do not establish effective protection

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

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

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

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

The adaptive response is the next accountability test

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

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

A baseline must permit the promised comparison

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

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

> POSITION SOUGHT

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

6 | Official correspondence and the limits of remedy

CWO - CASE STUDY 03

Merotherie Road complaint closure

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

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

> POSITION SOUGHT

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

CWO - CASE STUDY 04

Water questions followed by council closure

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

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

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

> POSITION SOUGHT

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

CWO - CASE STUDY 07

Independent complaint coverage remains incomplete

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

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

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

7 | Cumulative planning and continuing community concerns

CWO - CASE STUDY 05

Formal council evidence of consultation without decisions

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

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

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

> POSITION SOUGHT

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

CWO - CASE STUDY 06

Transport impacts reported despite closure of an information action

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

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

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

> POSITION SOUGHT

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

Contemporary evidence of unresolved institutional demands

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

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

8 | The water volumes dispute in New England

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

The figures that should be used

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

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

Why the October update does not settle availability

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

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

9 | Why allocation ratios do not resolve cumulative risk

The EIS identifies material limits in its availability evidence

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

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

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

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

The direct connection to the CWO record

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

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

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

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

Groundwater cannot be assumed to fill the gap

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

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

> POSITION SOUGHT

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

10 | What New England leaves to later work

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

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

The preapproval standard in the update

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

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

Why these gaps affect more than water accounting

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

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

A practical test for each deferred matter

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

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

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

Why complaints cannot complete the original assessment

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

11 | Exhibited information is out of date

SEARs requirements for a full and accurate project description

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

Summary

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

11.1 What the SEARs require

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

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

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

11.2 EnergyCo acknowledges the EIS is out of date

11.2.1 The project area was frozen in March 2026

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

Design changes EnergyCo has acknowledged in writing but not exhibited.

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

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

11.2.2 The changes affect sensitive parts of the assessment

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

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

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

11.2.3 Inconsistent baseline data

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

11.3 EIS shortcomings

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

11.4 Consequences

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

> POSITION SOUGHT

More work and re-exhibition. The Department should:

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

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

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

Requirements sought before determination

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

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

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

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

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

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

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

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

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

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

Final comment

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

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

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

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

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

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

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

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

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

Source register

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

S01 NSW planning approval for CWO REZ Transmission SSI 48323210

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

S02 NSW Legislative Council Portfolio Committee 4 REZ inquiry reports

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

S03 EnergyCo Social Impact Management Plan Summary

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

S04 EnergyCo CWO REZ Social Impact Management Plan

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

S05 EnergyCo Annual Community Attitudes Survey Summary of Results

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

S06 ACEREZ public statements on the Aboriginal rock shelter

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

S07 ABC report on the ACEREZ heritage investigation

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

S08 Emma Bowman Additional Information published by Parliament

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

S09 Mid Western Regional Council supplementary inquiry answers

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

S10 NSW parliamentary questions and ministerial answers on CWO REZ

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

S11 CWO Community Reference Group minutes 5 May 2026

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

S12 CWO Community Reference Group minutes 11 August 2026

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

S13 Dubbo Regional Council September 2026 meeting outcomes

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

S14 EWON responses to supplementary inquiry questions

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

S15 EWON renewable energy infrastructure jurisdiction and annual report

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

S16 ABC report on the disputed Merotherie Road alternative

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

S17 Government response and regional infrastructure studies

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

S18 New England REZ EIS Technical Report 14 Surface Water Assessment

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

S19 EnergyCo New England REZ regional water demand update

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

S20 NSW DCCEEW water allocation guidance

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

S21 NSW Public Works water correspondence held by the submission groups

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

S22 Daily Telegraph report of continuing water concerns

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

S23 Mid Western Regional Council water alliance funding release

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

S24 CWO Community Reference Group minutes 17 February 2026

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

S25 Corrected parliamentary hearing transcript 16 May 2025

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

S26 Public social media advocacy and reproduced statements

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

S27 NSW DCCEEW Water availability and access pathways for CWO REZ

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

Additional direct links for cited companion documents

S02 Report 65 final report

S02 Report 62 first report

S15 EWON Annual Report 2025 to 2026

S17 Government response to the first report

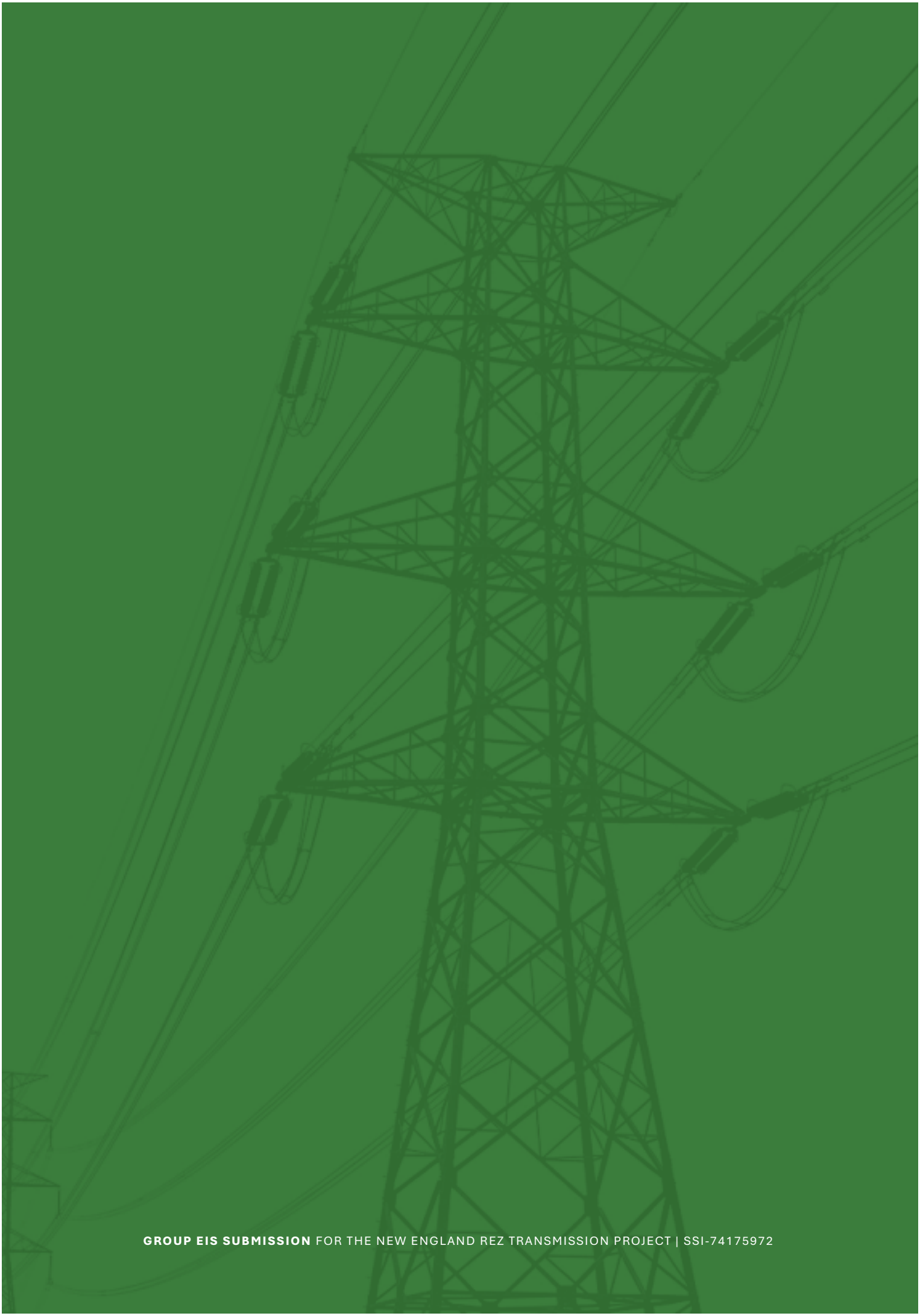
S20 Controlled allocations guidance

S26 Andrew Gee public heritage post

SECTION **3**

Biodiversity

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 3

Biodiversity

Key issues we have found ...



Nearly half remains unsurveyed

Nearly half the project area remains unsurveyed, leaving species, breeding habitat and opportunities to avoid damage unverified before project approval.



Extensive clearing will fragment habitat

Thousands of hectares of native vegetation face full or partial clearing, removing habitat and severing movement corridors for native wildlife.



Irreversible impacts remain a risk

The EIS identifies threatened species and communities at risk of serious, irreversible impacts, while essential surveys and assessments remain incomplete.



Wildlife crossings remain undecided

The EIS defers its connectivity strategy, leaving wildlife crossing locations, designs and expected effectiveness unresolved when the project seeks approval.



Offset delivery remains unproven

The EIS proposes a future offset agreement without demonstrating that suitable conservation outcomes are available, funded and secured before clearing.



Complete assessment before approval

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

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

Read in more detail >



Serious and Irreversible Impacts (SAII)

NSW BIODIVERSITY CONSERVATION ACT 2016

SAII refers to potential impacts from a development or infrastructure project that are deemed likely to contribute significantly to the **risk of extinction of a threatened species or ecological community** in New South Wales.

Threatened Ecological Communities (TECs)

- New England Peppermint Grassy Woodland (Critically Endangered)
- White Box Yellow Box Blakely's Red Gum Woodland (Box-Gum Woodland) (Critically Endangered)
- Ribbon Gum-Mountain Gum-Snow Gum Grassy Forest/Woodland

Flora & Fauna Entities (SAII trigger species)

Flora: Euphrasia arguta, Yellow loosestrife (Lysimachia vulgaris / Lysimachia species), Pterostylis riparia,
Scrub Turpentine (Rhodamnia rubescens), Small-fruited mountain gum (Eucalyptus microcodon).

Fauna: Long Sunskink, Stuttering Frog, Tusked Frog (Nandewar & New England Tableland population), Brush-tailed Rock-wallaby, Sooty Owl (breeding habitat), Large-eared Pied Bat (breeding habitat), Large Bent-winged Bat (breeding habitat), Eastern Cave Bat (breeding habitat).



Threatened Ecological Communities (TECs)

New England Peppermint Grassy Woodland (**Critically Endangered**) | White Box Yellow Box Blakely's Red Gum Woodland / Box-Gum Woodland (**Critically Endangered**) | Ribbon Gum–Mountain Gum–Snow Gum Grassy Forest/Woodland

Threatened Flora Species

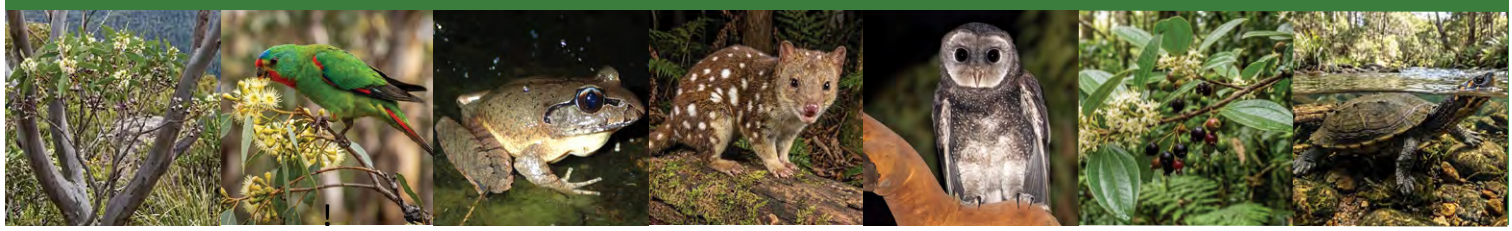
Critically Endangered & Endangered Flora: Scrub Turpentine (Rhodamnia rubescens) – Critically Endangered | Euphrasia arguta – Endangered / Critically Endangered | Small-fruited Mountain Gum (Eucalyptus microcodon) | Yellow Loosestrife (Lysimachia vulgaris / Lysimachia species) | Pterostylis riparia | Hawkweed (Picris evae) – Endangered

Additional Threatened Flora (Recorded / Assumed Present): Austral Toadflax (Thesium australe) | Gentiana davurica

Threatened Fauna Species

Critically Endangered & Endangered Fauna: Swift Parrot *(Lathamus discolor)* – **Critically Endangered** | Regent Honeyeater *(Anthochaera phrygia)* – **Critically Endangered** | Long Sunskink (Eulamprus leuraensis) – **Critically Endangered** | Koala *(Phascolarctos cinereus)* – Endangered & 1,373 hectares of critical koala habitat to be destroyed | Spotted-tailed Quoll (Dasyurus maculatus) – **Endangered** | Stuttering Frog (Mixophyes balbus) – **Endangered** | Tusked Frog (Adelotus brevis) – **Endangered Population** (Nandewar & New England Tablelands) | Booroolong Frog (Litoria booroolongensis) – **Endangered** | Bell's Turtle (Myuchelys bellini) - **Endangered** | Terrestrial Crayfish (Euastacus Maccai) - **Endangered** | Greater Glider (Petauroides volans) - **Endangered** with fragmentation & canopy destruction being critical

Vulnerable & Impacted Fauna Species: Brush-tailed Rock-wallaby *(Petrogale penicillata)* | Sooty Owl *(Tyto tenebricosa)* – Breeding habitat assessed | Large-eared Pied Bat *(Chalinolobus dwyeri)* | Large Bent-winged Bat *(Miniopterus orianae oceanensis)* | Eastern Cave Bat *(Vespadelus troughtoni)* | South-eastern Glossy Black-Cockatoo *(Calyptorhynchus lathami)* | White-throated Needletail *(Hirundapus caudacutus)* | Brown Treecreeper *(Climacteris picumnus victoriae)* | Diamond Firetail *(Stagonopleura guttata)* | Yellow-bellied Glider *(Petaurus australis)* | Southern Greater Glider *(Petauroides volans)* | Squirrel Glider *(Petaurus norfolcensis)* | Parma Wallaby (Notamacropus parma) | Varied Sittella *(Daphoenositta chrysoptera)* - **not named in EIS** | Little Lorikeet *(Glossopsitta pusilla)* - **not named in EIS** | Dusky Woodswallow *(Artamus cyanopterus cyanopterus)* - **not named in EIS** | Eastern False Pipistrelle *(Falsistrellus tasmaniensis)* - **not named in EIS** | Greater Broad-nosed Bat *(Scoteanax rueppellii)* - **not named in EIS** | Yellow-bellied Sheath-tail Bat *(Saccolaimus flaviventris)* - **not named in EIS**



The Environmental Impact Statements claims ...

Total Environment Disturbance

3,579 hectares

Total Full Clearing

2,784.39 hectares

Total Partial Clearing

418.56 hectares

Offset Liability Credit Estimate

687,276

The following works are to be **carried out after EIS Exhibition**.

- Surveys on newly accessible private land.
- Surveys on new land proposed to be added to the project.
- Targeted surveys not completed because of seasonal timing.
- Revision of the disturbance footprint.
- Reassessment of mapped vegetation condition.
- Additional remote assessment
- Preparation of a revised BDAR for the Submissions Report & Amendment Report.

Increased heavy traffic will have a substantial threat to all wildlife.

Claims regarding land clearing and biodiversity off ets presented in the Environmental Impact Statement (EIS) for the New England REZ Transmission Project must be assumed insufficient. Gi en that further environmental field assessments, unknown additional land is proposed to be added and project works are required after the public exhibition period closes.

The EIS fails to provide a complete or accurate account of the project's ecological footprint.

Consequently, the public and affec ed communities are being denied the opportunity to review the true extent of biodiversity destruction and evaluate the legitimacy of the proposed off ets. All biodiversity impact assertions should be suspended from approval until full, transparent, and post-work assessments are presented for public exhibition.



SECTION **3**

Biodiversity Impacts

EXECUTIVE SUMMARY

This submission objects to the approval of the **New England Renewable Energy Zone Network Infrastructure Project** in its currently assessed form.

The objection does not dispute the importance of renewable energy infrastructure. It concerns whether this particular project, at this location and in its present form, has been assessed with sufficient completeness, accuracy and transparency to permit a lawful, rational and properly informed determination of its biodiversity impacts.

The exhibited Environmental Impact Statement (**EIS**) discloses that:

Our principal concerns are:

- the current project area is approximately 10,928 hectares, but only approximately 54% had been subject to biodiversity survey;
- surveys were still ongoing, with land-access limitations preventing survey of the balance;
- uncompleted targeted surveys, new land, revised infrastructure locations, disturbance-footprint refinement and a revised Biodiversity Development Assessment Report (BDAR) were deferred until after exhibition;
- the project would have a disturbance footprint of approximately 3,579 hectares;
- approximately 3,203 hectares of native vegetation across 45 Plant Community Types (PCTs) would be affected, comprising approximately 2,784.39 hectares of full clearing and 418.56 hectares of partial clearing;
- 8 Threatened Ecological Communities (TECs) listed under the Biodiversity Conservation Act 2016 (NSW) occur in the project area, of which areas corresponding to 4 Commonwealth-listed Threatened Ecological Communities are identified;
- threatened flora and fauna species are recorded or assumed present which are at risk of Serious and Irreversible Impacts (SAII);
- significant residual impacts are predicted for multiple matters protected under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act);
- the estimated Biodiversity Offsets Scheme liability is 687,276 credits, of which 435,387 credits are attributed to inaccessible, unsurveyed land; and
- the proponent proposes further surveys, footprint revision, vegetation-condition reassessment and a revised BDAR after the exhibition process.

Source > EIS—Biodiversity, [42]–[51], [54]–[58], [275]–[285], [311]–[361], [505]–[524].

These are not peripheral details. They concern :

- the identity, location, condition and significance of biodiversity values
- the location and extent of impacts
- whether impacts can be avoided
- whether SAII or significant impacts on matters of national environmental significance (**MNES**) will occur
- and the scale and feasibility of offsets.

The EIS incorporates and relies upon Technical Report 1 as the project's detailed biodiversity assessment. Technical Report 1 was supplied as a PDF with poor or no reliably extractable text. This submission therefore does not claim to have verified passages of that report that could not be accessed. It relies primarily on the express description and summary of the BDAR in EIS Section 7. Because the EIS states that it incorporates and relies upon Technical Report 1, defects and incompleteness expressly disclosed in the EIS also call into question whether the exhibited BDAR constitutes a sufficiently final and reliable assessment record.

The submitter requests that the project be **refused in its current form**.

Alternatively, determination should be suspended and the proponent directed to prepare a completed revised EIS and BDAR following all reasonably practicable seasonal and targeted surveys, project redesign and independent expert peer review. Those documents should then be publicly re-exhibited for a full consultation period.





> Tomalla Creek, 400m from corridor 2024, and Eastern Spotted Quoll at 2656 Forest Way 2025

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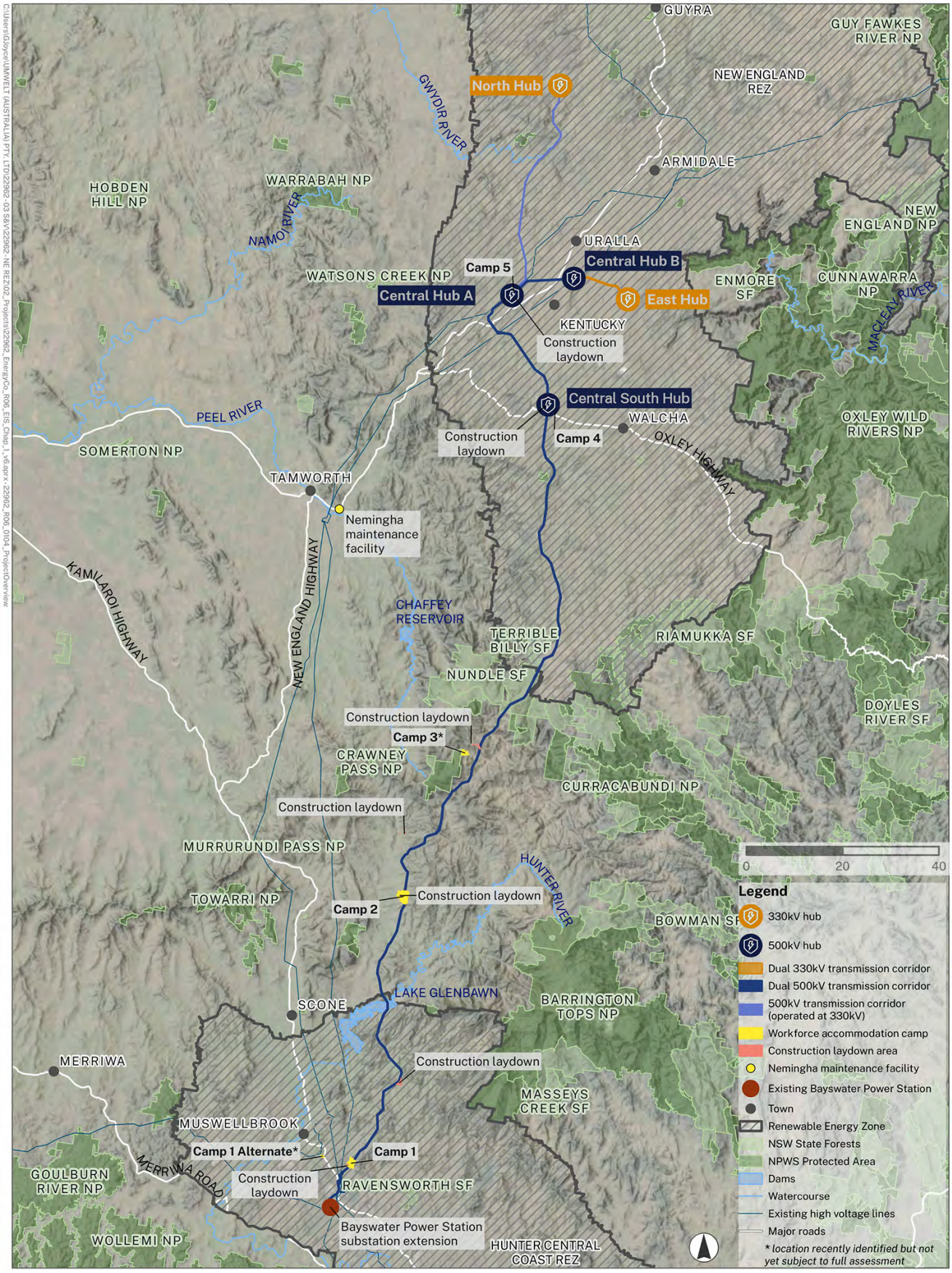
2 | Nature of the Objection

The objection is founded on the following related propositions:

1	**The assessment is premature.** Material fieldwork, analysis and project design remain incomplete.
2	**The project assessed is not sufficiently settled.** Infrastructure locations, ancillary sites, micro-siting, sensitive-area mapping, connectivity measures and the disturbance footprint remain subject to material refinement.
3	**The unsurveyed portion creates uncertainty.** Conservative credit assumptions do not establish where important populations, breeding resources, ecological communities, corridors or avoidance opportunities occur.
4	**The predicted environmental impact is extensive and critical.** The scale of clearing, fragmentation, noise, vibration (bats) and habitat modification requires a particularly rigorous assessment due to the remoteness and untouched nature. The reason why the area has so many critically endangered, endangered and threatened or vulnerable species is because of the remote and untouched ecological communities. The EIS does not refer to the impacts of change in water sources to the biodiversity.
5	The referred **Biodiversity Management Plan has not been developed** and should not be considered until the BMP is complete.
6	Biodiversity comparisons to alternative routes and the previous routes **have not been considered**.
7	**SAII and MNES conclusions require a completed evidentiary basis.**
8	**Avoidance and minimisation have not been demonstrated transparently at the appropriate stage.**
9	**A substantial part of the mitigation, offset and monitoring response is deferred.**
10	**The public has not received a final assessment record on which to make informed submissions.**

This submission does not contend that every incompleteness necessarily establishes legal invalidity. It submits that the identified failures, deficiencies and unresolved risks prevent a properly informed merits determination unless they are cured before approval.



> Project Overview

3 | Factual Background

3.1 Assessment Documents

EIS Section 7 states that:

- the biodiversity assessment was undertaken under the Biodiversity Assessment Method (BAM);
- the outcomes are documented in the BDAR in Technical Report 1;
- the project was declared a controlled action under the EPBC Act; and
- Commonwealth assessment is to occur under the NSW–Commonwealth assessment bilateral agreement.

> Source: EIS—Biodiversity, [5]–[11].

The Commonwealth controlled-action decision was made on **16 March 2026**. The controlling provisions are listed threatened species and ecological communities under ss 18 and 18A of the EPBC Act, and the action is to be assessed under the bilateral agreement.

> Source: epbcpublicportal.environment.gov.au

3.2 Survey Coverage and Inaccessible Land

The EIS reports survey work across current and previous alignments from September 2023. It also acknowledges that, following the October 2025 corridor change, some earlier survey effort fell outside the current project area.

Further surveys of the current project area commenced in November 2025 and remained ongoing. Of the approximately 10,928-hectare project area, approximately 54% had been surveyed. Access limitations prevented surveys of the remaining area.

> Source: EIS—Biodiversity, [41]–[44]

For inaccessible land, the assessment used a combination of:

- expert advice;
- literature review;
- remote sensing;
- reference-population information;
- a bespoke roadside-vantage-point method;
- refinement of State Vegetation Type Mapping;
- government mapping; and
- assumed presence of candidate flora and fauna species.

> Source: EIS—Biodiversity, [45]–[51], [70]–[71].

The EIS characterises this as precautionary and suggests that further surveys are likely to reduce predicted impacts. That possibility does not exclude the opposite or a materially different result at particular locations. Fieldwork may reveal fewer assumed presences, but it may also identify previously unmapped populations, breeding habitat, population concentrations, TEC diagnostic characteristics, habitat trees, caves, rocky features, riparian values or avoidance opportunities.

3.3 Extent of proposed disturbance

The stated disturbance footprint is approximately **3,579 hectares**, comprising:

- approximately 3,144 hectares in disturbance area A, where all vegetation strata may be removed; and
- approximately 435 hectares in disturbance area B, where overstorey removal or partial clearing may occur.

> Source: EIS—Biodiversity, *[52]–[58]*.

Within that footprint, the EIS predicts impacts to approximately **3,203 hectares of native vegetation** across **45 PCTs**, including:

- **2,784.39 hectar**es of full clearing;
- 418.56 hectares of partial clearing; and
- an ecosystem-credit liability of **72,561 credits**.

> Source: EIS—Biodiversity, [274]–[285]

The EIS expressly notes that vegetation condition and extent in inaccessible areas were not field verified and that mapping in those areas is based on NSW Government mapping.

> Source: EIS—Biodiversity, [284]–[286]

3.4 Ecological Communities and Threatened Species

The EIS identifies approximately **5,381.95 hectares** of native vegetation in the project area corresponding to eight NSW-listed TECs (Threatened Ecological Community). Approximately **3,684.23 hectares** is said also to meet the definitions of four Commonwealth-listed TECs (Threatened Ecological Community).

> Source: EIS—Biodiversity, [92]–[96]

Within the disturbance footprint, the EIS identifies impacts on:

- **6** endangered and 2 critically endangered NSW-listed TECs (Threatened Ecological Community);
- 37 threatened flora species recorded or assumed present, of which 8 were recorded and 29 assumed present; and
- potential habitat for 35 threatened fauna species recorded or assumed present, of which 23 were recorded and 12 assumed present.

> Source: EIS—Biodiversity, [291]–[320], [333]–[341]

The EIS identifies **15 SAII (Serious and Irreversible Impact) entities** known or assumed to occur within the disturbance footprint. Several are included through assumed presence or incomplete surveys.

> Source: EIS—Biodiversity, [346]–[359]

- New England Peppermint Grassy Woodland
- Box-gum Woodland
- Small-fruited Mountain Gum
- Sooty Owl
- Tusked Frog
- Euphrasia Arguta
- Yellow Loosestrife
- Pterostylis Riparia
- Scrub Turpentine
- Large-eared Pied Bat
- Long Sunskink
- Stuttering Frog
- Brush-tailed Rock Wallaby

3.5 MNES

The EIS reports that:



> Source: EIS—Biodiversity, [362]–[368]

3.6 Clearing Corridors and Connectivity

Transmission easements may create vegetation gaps or fragmentations of approximately:

- **140 metres** for dual 500 kV lines;
- **120 metres** for dual 330 kV lines; and
- **70 metres** for the single 500 kV line,

with additional width potentially required at transposition sites and other infrastructure locations. The EIS acknowledges particular sensitivity for arboreal mammals, gliding species, ground-dependent fauna and habitat specialists.

> Source: EIS—Biodiversity, [443]–[448]

A Connectivity Strategy, including final locations and designs for retained corridors and possible artificial structures such as rope bridges and koala refuge poles, is deferred.

> Source: EIS—Biodiversity, [448], [463]–[465]

3.7 Offset liability and further work

The EIS gives the following credit estimate:

Credit category	Accessible land	Inaccessible land	Total
Ecosystem credits	28,458	44,103	**72,561**
Flora species credits	47,299	94,618	**141,917**
Fauna species credits	176,132	296,666	**472,798**
Total	251,889	435,387	**687,276**

EnergyCo states an intention to enter into a future Strategic Offset Delivery Agreement (SODA) with NSW DCCEEW. The EIS does not establish in Section 7 that all required credits or ecologically suitable conservation outcomes have been identified, secured and made available.

> Source: EIS—Biodiversity, [509]–[514]

Further work proposed after exhibition includes:

- surveys on newly accessible private land;
- surveys on new land proposed to be added to the project area;
- targeted surveys not completed for the exhibited BDAR because of seasonal timing;
- revision of the disturbance footprint;
- reassessment of mapped vegetation condition;
- additional remote assessment;
- comparison of past and alternative routes
- preparation of a revised BDAR for the Submissions Report or Amendment Report.

> Source: EIS—Biodiversity, [515]–[524]





4 | Applicable Statutory and Policy Framework

4.1 Environmental Planning and Assessment Act 1979 (NSW)

The project is to be assessed under Division 5.2 of the *Environmental Planning and Assessment Act 1979* (**EP&A Act**).

In summary:

- **Section 5.**16 requires environmental assessment requirements and an EIS in the prescribed form;
- Section 5.17 governs submission of the EIS, environmental assessment and public consultation;
- Under s 5.17(2), the Planning Secretary may require a revised EIS;
- Under s 5.17(6), the Planning Secretary may require a response to submissions and a preferred infrastructure report identifying proposed changes to minimise environmental impacts or address assessment issues;
- Under s 5.17(7), a preferred infrastructure report involving significant changes be made publicly available;
- Section 5.18 requires the Planning Secretary's environmental assessment report to the Minister; and
- Section 5.19 concerns the Minister's determination and the terms on which approval may be given. (legislation.nsw.gov.au)

These provisions should be exercised so that the decision-maker has a sufficiently final description of the infrastructure and a reliable assessment of its material impacts.

4.2 Environmental Planning and Assessment Regulation 2021 and SSI Guidelines

The *Environmental Planning and Assessment Regulation 2021* requires an SSI (State Significant Infrastructure) EIS to comply with the Planning Secretary's environmental assessment requirements. The EIS must provide the information and analysis necessary for assessment of the project and its environmental consequences.

The State Significant Infrastructure Guidelines address the preparation of EISs, submissions reports, amendment reports and preferred infrastructure reports. The guidelines were currently updated in 2026 to reflect planning-system reforms and continue to distinguish between the exhibited assessment, responses to submissions and assessment of material amendments.

> Source: planning.nsw.gov.au

The statutory process permits refinement. It should not, however, be used to defer the essential baseline, impact, avoidance and significance work needed to identify the project being assessed.

4.3 Biodiversity Conservation Act 2016, Regulation and BAM

The relevant NSW biodiversity framework includes:

- the Biodiversity Conservation Act 2016 (BC Act);
- the Biodiversity Conservation Regulation 2017 (BC Regulation);
- the BAM;
- the Biodiversity Offsets Scheme (BOS); and
- applicable guidance concerning threatened entities and SAII.

The BAM establishes the assessment method, but application of the method does not eliminate the need for reliable project-specific data, defensible mapping, transparent assumptions and proper application of the avoid–minimise–offset hierarchy.

Under **cl 6.7 of the BC Regulation**, the decision-maker—not merely the proponent or accredited assessor—must determine whether proposed impacts are serious and irreversible by reference to the prescribed principles.

The current NSW SAII guidance is dated **1 May 2026** and was prepared under s 6.5(2) of the BC Act. It addresses identification of relevant biodiversity values and the decision-maker's determination of SAII.

> Source: environment.nsw.gov.au

The final assessment should therefore apply the current May 2026 guidance, rather than rely only on the earlier 2019 guidance cited in the EIS tables.

4.4 EPBC Act and Bilateral Assessment

The project is controlled action **EPBC 2025/10405** because of potential impacts on listed threatened species and ecological communities. It requires Commonwealth approval and is being assessed through the NSW bilateral process.

> Source: epbcpublicportal.environment.gov.au

The assessment record must be sufficient to enable the Commonwealth Minister to identify and evaluate impacts on each relevant MNES, including direct, indirect, facilitated and cumulative impacts; assess avoidance and mitigation; determine residual significant impacts; and formulate enforceable conditions.

A general NSW biodiversity-credit assessment is not necessarily sufficient by itself to discharge the species- and community-specific information requirements relevant to the EPBC Act.

4.5 Ecologically sustainable development

The decision-maker should have regard, as relevant, to principles of ecologically sustainable development, including:

- The precautionary principle;
- Intergenerational equity;
- Conservation of biological diversity; and
- Maintenance of ecological integrity.

These principles are not advanced as an automatic or standalone veto. They support a cautious approach where potentially serious or irreversible harm is plausible and the scientific and spatial information remains materially incomplete.





5 | Summary of Objection Grounds

Ground	Principal evidence	Legal or decision-making significance	Requested response
1. Premature assessment	Only approximately 54% of the 10,928-hectare project area surveyed; surveys ongoing; access prevented survey of balance. *([42]–[51])*	The baseline and residual impacts cannot yet be determined with adequate confidence.	Refuse or require completed surveys and revised EIS/BDAR.
2. Unsettled design	New sites, detailed design, micro-siting and footprint revision deferred. *([252]–[270], [515]–[524])*	The assessment does not yet address a sufficiently settled project.	Require fixed impact envelope, revised design and assessment before determination.
3. Methodological uncertainty	Remote sensing, roadside observations, mapping, benchmark condition and assumed species presence. *([45]–[51], [70]–[71])*	Conservative credit estimates do not resolve ecological or spatial uncertainty.	Field verification wherever reasonably practicable and uncertainty analysis.
4. Clearing and fragmentation	3,579-hectare footprint; 3,203 hectares of native vegetation affected; 45 PCTs. *([54]–[58], [275]–[285])*	Magnitude demands rigorous avoidance and regional-context assessment.	Redesign to reduce clearing, widths and fragmentation.
5. TECs and threatened species	Eight NSW TECs; four Commonwealth TECs in project area; numerous recorded or assumed species. *([92]–[96], [291]–[341])*	Ecological consequences extend beyond credit calculations.	Entity-specific impact and avoidance assessment.
6. SAII	Fifteen potential SAII entities; many assumed present; surveys incomplete. *([346]–[361])*	Decision-maker cannot safely complete cl 6.7 task on an incomplete record.	Current-guidance, entity-specific SAII reassessment.
7. MNES	Controlled action; significant residual impacts predicted for multiple entities. *([362]–[368])*	Bilateral record must support a separate Commonwealth decision.	Revised MNES appendix based on completed data.
8. Avoidance not demonstrated	General route-refinement claims; future micro-siting relied upon. *([252]–[270])*	Avoidance must precede offsetting and be demonstrated transparently.	Alternatives matrix and reasons for route and design selection.
9. Indirect and prescribed impacts	Edge effects, weeds, pathogens, fire, water, collision, vehicle strike, karst and rocky habitat. *([401]–[442])*	Management plans cannot substitute for baseline risk assessment.	Quantified impact zones, controls and enforceable thresholds.
10. Connectivity	Easement gaps of 70–140 metres; corridor locations and structures deferred. *([443]–[448], [463]–[465])*	Fragmentation consequences remain uncertain.	Final mapped, protected and performance-tested connectivity design.
11. Cumulative impacts	Biodiversity analysis substantially cross-refers to Section 24 and BDAR appendix. *([466]–[470])*	Lack of transparent synthesis impedes scrutiny of regional impacts.	Updated regional cumulative-impact assessment.
12. Offset feasibility	687,276 credits, including 435,387 for inaccessible land; future SODA. *([505]–[514])*	Availability, equivalence, timing and permanence are unresolved.	Offset feasibility plan and security before clearing.
13. Deferred plans	BMP, sensitive-area maps, micro-siting, procedures and Connectivity Strategy deferred. *([475]–[490])*	Adaptive management is unsuitable as the primary response to irreversible loss.	Finalise essential plans before determination or clearing.
14. Public participation	Final surveys, footprint, BDAR, SAII conclusions and credits will post-date exhibition. *([515]–[524])*	Public submissions are being sought on a materially incomplete record.	Full re-exhibition of revised documents.
15. ESD principles	Serious potential harm combined with unresolved uncertainty.	Supports caution, avoidance and acquisition of better information.	Do not approve until uncertainty is materially reduced.
16. Data integrity	Multiple area categories, assumptions and future revisions.	Internal inconsistencies may propagate through impact and credit calculations.	Independent reconciliation and audit.

6 | Detailed Grounds of Objection

Ground 1 | Prematurity and absence of a final assessment

The EIS was exhibited while material biodiversity surveys remained incomplete. Approximately 46% of the project area had not been surveyed, and some targeted surveys in accessible areas could not be completed because of survey timing.

> Source: EIS—Biodiversity, [42]–[51], [515]–[520].

This is material because survey timing and effort affect the detection of:

- Seasonal flora, including orchids and other short-detectability species;
- Breeding frogs;
- Migratory or nomadic birds;
- Microbats and cave use;
- Denning, nesting and roosting resources;
- Reptiles associated with rocky habitat;
- Gliders and other arboreal mammals; and
- The diagnostic condition and extent of TECs.

The proponent's express proposal to revise the footprint, reassess vegetation condition, conduct outstanding surveys and produce a revised BDAR confirms that the exhibited assessment is not final.

> SUBMISSION

Approval should not be based on the expectation that the assessment may later become more accurate. The assessment should be sufficiently complete before impacts become authorised.

Ground 2 | Material Project Design Remains Unsettled

The EIS states that full assessment of recently identified ancillary locations, including alternate camp or new land, will occur in the revised BDAR. It also states that reference-design refinement, detailed design and micro-siting will continue after exhibition.

> Source: EIS—Biodiversity, [252]–[270]

Micro-siting can appropriately resolve minor construction details within a fully assessed envelope. It should not determine, after approval:

- whether a significant population or TEC patch is cleared;
- the location and width of habitat severance;
- whether critical breeding or roosting habitat is affected;
- the actual impact on a potential SAII entity;
- the final offset obligation; or
- whether a feasible avoidance alternative existed.

> SUBMISSION

The approval process should assess the project actually proposed, not a broad corridor within which material biodiversity consequences will later be selected.

Ground 3 | Methodological uncertainty for inaccessible land

The submitter acknowledges that assuming benchmark vegetation condition and species presence may generate conservative credit calculations. That is preferable to assuming absence.

It does not, however, cure uncertainty about:

- actual species distribution and abundance;
- whether habitat supports a locally or regionally important population;
- breeding, roosting, denning or refuge sites;
- TEC diagnostic condition;
- habitat-tree density and hollow classes;
- movement pathways and bottlenecks;
- rocky, cave, karst and riparian features;
- the interaction between habitat patches;
- the availability of route-level or site-level avoidance; or
- the significance of impacts under SAII and EPBC Act criteria.

The proposition that further survey is likely to reduce credit liability should not become a substitute for completing the assessment. Reduction of an assumed polygon does not necessarily mean reduction of ecological risk; fieldwork may identify a smaller but more important population or resource.

> SUBMISSION

The revised assessment should distinguish clearly between uncertainty that affects only credit quantity and uncertainty that affects impact significance, population viability, connectivity or avoidance.

Ground 4 | Scale of clearing and fragmentation

The proposed impact—approximately 3,203 hectares of native vegetation across 45 PCTs—is substantial. It includes approximately 2,784.39 hectares of full clearing and 418.56 hectares of partial clearing.

> Source: EIS—Biodiversity, [275]–[285]

Partial clearing should not be treated as ecologically negligible. Removal of overstorey can:

- eliminate canopy connectivity;
- remove hollows, nests and foraging resources;
- alter shade, moisture, temperature and wind exposure;
- increase edge effects and weed invasion;
- modify fire behaviour; and
- impair long-term recruitment and structural complexity.

Easements of up to approximately 140 metres through forested areas are capable of creating substantial gaps for canopy-dependent fauna and habitat specialists.

> Source: EIS—Biodiversity, [443]–[448]

> SUBMISSION

The revised EIS requires a landscape-scale fragmentation analysis, not only an area-based clearing account.

Ground 5 | Threatened ecological communities and threatened species

Eight NSW TECs and areas corresponding to four Commonwealth TECs are identified in the project area. The disturbance footprint affects numerous listed communities and habitat for numerous threatened species.

> Source: EIS—Biodiversity, [92]–[96], [291]–[341]

- Credit calculations are not a complete account of ecological consequences. The revised assessment should address:
- condition, patch size and configuration;
- relationship to remaining regional extent;
- recruitment and age structure;
- population and metapopulation function;
- key habitat resources;
- connectivity with conservation lands;
- indirect degradation;
- vulnerability to drought, fire and climate change; and
- prospects for genuine restoration or replacement.

> SUBMISSION

For each materially affected TEC and threatened species, the revised BDAR should provide a concise impact statement linking evidence, impact pathway, avoidance, mitigation, residual risk and proposed offset response.

Ground 6 | Inadequate basis for SAII determination

Fifteen SAII entities are identified as known or assumed to occur in the disturbance footprint. Several have been included on the basis of assumed presence, expert polygons or incomplete targeted surveys.

> Source: EIS - Biodiversity, [346]–[361]

The decision-maker must independently determine SAII under cl 6.7 of the BC Regulation. That task should not be reduced to accepting credit calculations or the assessor's conclusion.

Each entity requires transparent application of every relevant cl 6.7 principle, including:

- current population and distribution information;
- the NSW and regional context of the affected occurrence;
- the scale and quality of habitat affected;
- direct, indirect and cumulative impact pathways;
- uncertainty and sensitivity analysis;
- the degree of contribution to extinction risk;
- irreplaceability and recovery potential;
- feasible avoidance and redesign; and
- the consequences of worst-case assumptions.

The final analysis should apply the **1 May 2026 NSW SAII guidance** and explain any differences from analysis prepared under the superseded 2019 guidance.

> Source: (environment.nsw.gov.au)

> SUBMISSION

Offsetting is not a substitute for determining whether an impact is serious and irreversible or for avoiding that impact.

Ground 7 | MNES and bilateral-assessment deficiencies

The project's controlled-action status means the NSW assessment record must be sufficiently complete for a separate Commonwealth approval decision.

The record should identify, for each relevant MNES:

- the affected population, occurrence or community;
- habitat critical to survival;
- direct, indirect and cumulative impacts;
- impacts of construction, operation and maintenance;
- application of approved conservation advice and recovery plans;
- alternatives and avoidance;
- mitigation effectiveness and uncertainty;
- the residual significant impact; and
- any proposed offset and its conformity with applicable Commonwealth requirements.

The EIS predicts significant residual impacts on three Commonwealth TECs, six threatened flora species and 18 threatened fauna species.

> Source: EIS—Biodiversity, [362]–[368]

> SUBMISSION

It is unsafe to leave essential MNES fieldwork and impact definition to post-exhibition studies. A revised MNES assessment should be prepared and re-exhibited.

Ground 8 | Avoidance and minimisation have not been adequately demonstrated

The EIS describes broad corridor changes and examples of avoidance. Those steps are relevant and should be acknowledged.

> Source: EIS—Biodiversity, [252]–[269]

However, the exhibited material does not transparently demonstrate the comparative consideration of:

- alternative route variants;
- alternative tower, substation, camp, laydown and access-track locations;
- narrower easements or disturbance areas;
- spanning of sensitive vegetation;
- alternative conductor or tower configurations;
- undergrounding at discrete critical locations;
- helicopter, drone or low-impact construction methods;
- access from already disturbed land;
- seasonal construction constraints; and
- permanent no-go areas.

Future micro-siting is not equivalent to a documented alternatives assessment.

> SUBMISSION

A geospatial alternatives matrix should identify each feasible option, its biodiversity consequences, engineering constraints, cost or constructability implications, and reasons for selection or rejection.

Ground 9 | Indirect, prescribed and operational impacts

The EIS recognises risks from:

- edge effects;
- noise, light and dust;
- weeds and pathogens;
- altered fire regimes;
- hydrological change and water-quality impacts;
- vehicle strike;
- collision with transmission infrastructure;
- disturbance of breeding and roosting habitat;
- karst, cave and rocky-habitat impacts; and
- ongoing vegetation management.

> Source: EIS—Biodiversity, [401]–[442], [449]–[465]

The assessment requires greater definition of impact zones, duration, frequency, consequence and mitigation effectiveness.

Karst and rocky habitats warrant particular caution because subsurface voids, hydrological connections, cave use and breeding habitat may not be reliably identified by desktop mapping alone. Similarly, ongoing removal of hazard trees may cause impacts additional to the initial construction footprint.

> SUBMISSION

Baseline risk and residual impact must be assessed before reliance is placed on later management plans.

Ground 10 | Habitat connectivity remains unresolved

The project intersects a broad climate-change corridor and numerous local movement pathways. The EIS acknowledges sensitivity of gliders, arboreal mammals, ground-dependent fauna and habitat specialists to canopy and vegetation gaps.

> Source: EIS—Biodiversity, [72]–[78], [443]–[448]

The proposed connectivity response remains indicative. Rope bridges and refuge poles may assist some species in some settings, but their effectiveness depends upon:

- species-specific design;
- placement relative to established movement pathways;
- adjoining vegetation structure;
- predator exposure;
- crossing length;
- maintenance;
- demonstrated use; and
- timely corrective action.

> SUBMISSION

Connectivity outcomes should be mapped and designed before approval or, at minimum, before any clearing in the relevant sector. Performance criteria should address actual use and ecological function, not merely installation.

Ground 11 | Cumulative-impact assessment lacks transparent biodiversity synthesis

Section 7 substantially cross-refers to Section 24 and an appendix to the BDAR for cumulative impacts.

> Source: EIS—Biodiversity, [466]–[470]

A sufficient biodiversity cumulative-impact assessment should identify:

- the projects included and excluded;
- their status and reasonable foreseeability;
- spatial and temporal overlap;
- combined PCT and TEC clearing;
- regional habitat-corridor loss;
- combined effects on relevant populations;
- interaction with transmission and renewable-energy development;
- compounding effects of fire, drought and climate change;
- competition for offset credits and stewardship sites; and
- thresholds beyond which regional ecological function may be compromised.

> SUBMISSION

A cross-reference without an accessible and transparent biodiversity synthesis impedes public scrutiny and informed decision-making.

Ground 12 | Offset scale, feasibility and timing

A liability of **687,276 credits** is exceptional in scale. More than half— **435,387 credits** —is attributed to inaccessible land.

> Source: EIS—Biodiversity, [505]–[509]

Before approval, the decision-maker should understand:

- whether required credits exist or can realistically be generated;
- whether they satisfy applicable like-for-like or variation rules;
- whether offsets are geographically and ecologically relevant;
- whether threatened-species habitat and TEC values can genuinely be secured;
- the timing gap between impact and conservation gain;
- additionality and permanence;
- management funding and long-term stewardship;
- landholder participation;
- risks of reliance on restoration rather than protection; and
- interaction with credit demand from other regional projects.

A future SODA may be a delivery mechanism. It does not itself demonstrate the availability or ecological adequacy of offsets for this project.

> SUBMISSION

No clearing should occur until the applicable offset obligation has been finally calculated and corresponding offsets are legally secured. A payment-only pathway should not be accepted merely for administrative convenience and should be used only where lawful and ecologically justified.

Ground 13 | Excessive reliance on adaptive management and deferred plans

The EIS defers substantial detail to:

- the Biodiversity Management Plan;
- Sensitive Area Mapping;
- the Vegetation Clearing Procedure;
- species action measures;
- fauna and hollow-management procedures;
- unexpected-find protocols;
- the Connectivity Strategy; and
- monitoring and adaptive-management programs.

(EIS—Biodiversity, [475]–[490].)

Adaptive management is appropriate where:

- baseline conditions are known;
- the relevant impact is reversible;
- outcomes can be detected before unacceptable harm occurs;
- objective thresholds exist;
- corrective measures are proven; and
- sufficient time and authority exist to intervene.

It is not an adequate primary response to clearing of irreplaceable habitat, loss of breeding sites or serious and irreversible impacts.

> SUBMISSION

Essential design and avoidance matters should be resolved before approval. Remaining plans must contain measurable outcomes, hold points, stop-work triggers, independent approval and public reporting.

Ground 14 | Public participation and procedural fairness

The public is presently being asked to comment without:

- final survey data;
- a final project footprint;
- final assessment of new land and ancillary sites;
- a revised BDAR;
- final SAII conclusions;
- a final credit liability;
- a final connectivity design; or
- final key management strategies.

The intended post-exhibition work is capable of changing both the extent and the character of impacts. A reduction in credit numbers would not necessarily make the changes immaterial; newly identified populations, routes or habitat values could materially alter the assessment.

> SUBMISSION

A revised EIS, revised BDAR, updated MNES assessment and associated maps should be re-exhibited for a full statutory consultation period.

Ground 15 | Precautionary principle, intergenerational equity and biodiversity conservation

The assessment combines:

- potentially serious or irreversible harm;
- extensive clearing and fragmentation;
- affected threatened entities;
- incomplete data; and
- uncertain offset feasibility.

In those circumstances, lack of full scientific certainty should not be used to postpone cost-effective measures to prevent environmental degradation. Here, those measures include obtaining better information, redesigning the project and avoiding high-risk locations before authorisation.

Intergenerational equity also requires attention to the permanent loss and fragmentation of habitat, particularly where future ecological restoration cannot reliably reproduce mature forest structure, hollows, cave systems, complex soils or established ecological relationships.

Ground 16 | Data integrity and internal consistency

The revised assessment should independently reconcile:

- project area, survey area, assessment area and disturbance footprint;
- current and previous corridor survey effort;
- accessible and inaccessible land;
- disturbance areas A and B;
- full clearing, partial clearing and operational vegetation management;
- recorded, likely and assumed presence;
- habitat polygons and individual-count estimates;
- TEC diagnostic condition and PCT association;
- ecosystem and species credit calculations;
- impact areas reported in different tables;
- SAII-specific impact areas;
- MNES impact areas;
- new and alternate sites; and
- all changes between exhibited and revised versions.

All spatial data should use a common version date and be supported by a change register explaining every material alteration.

7 | Relief Sought

A. Primary relief — refusal

The submitter requests that approval be **refused in its current form** because:

1. the biodiversity assessment is materially incomplete;
2. the project design and impact footprint remain unsettled;
3. the residual risk to threatened biodiversity, SAII entities and MNES cannot presently be determined with sufficient confidence;
4. avoidance and minimisation have not been demonstrated on a final evidentiary basis; and
5. offset feasibility and key mitigation outcomes remain unresolved.

B. Alternative relief — further assessment before determination

If the project is not refused, the Planning Secretary should exercise the available statutory powers to require:

6. a completed and revised EIS;
7. a revised, final and internally reconciled BDAR;
8. all reasonably practicable seasonal and targeted surveys;
9. field verification of inaccessible land wherever access can reasonably be obtained;
10. assessment of all new land and ancillary sites;
11. a materially refined disturbance footprint;
12. updated SAII assessments under current May 2026 guidance;
13. an updated, entity-specific MNES assessment;
14. a transparent alternatives and avoidance matrix;
15. a regional cumulative-impact assessment;
16. a detailed offset-feasibility and delivery plan;
17. a complete and detailed Environmental Impact Statement of the previous route and how it compares with the current route;
18. independent peer review by experts without prior project involvement;
19. written review by relevant NSW biodiversity and Commonwealth agencies;
20. a Submissions Report and, where applicable, Amendment Report or preferred infrastructure report; and
21. full public re-exhibition of materially revised documents.

C. Further alternative — minimum conditions if approval is contemplated

Approval should not be granted merely because conditions may later be drafted. If approval is nevertheless contemplated, the minimum conditions should be imposed in precise and enforceable terms.

8 | Alternative Minimum Conditions

8.1 Pre-clearing assessment and hold points

- No clearing until a final field-verified BDAR has been accepted in writing by the Planning Secretary following consultation with relevant biodiversity agencies.
- No clearing in an area subject to an incomplete seasonal survey until that survey is completed within an appropriate detection period.
- Establish sector-specific hold points requiring written release by an independent biodiversity auditor.
- Do not permit known data gaps to be managed solely through an unexpected-find protocol.
- Require pre-clearance verification by suitably qualified species experts where SAII entities, MNES, breeding habitat, caves, rocky habitat or TECs may occur.

8.2 Spatial limits and no-go areas

Impose hard spatial clearing caps by:

- PCT;
- vegetation zone and condition;
- NSW and Commonwealth TEC;
- threatened-species habitat;
- full and partial clearing category; and
- project sector.

Attach georeferenced impact and exclusion maps to the approval.

Establish no-go zones for:

- SAII habitat that can reasonably be avoided;
- critical or high-value MNES habitat;
- breeding, roosting and denning sites;
- caves, karst and high-value rocky habitat;
- core riparian corridors; and
- high-density habitat-tree areas.

Prohibit transfer of unused clearing allowances between ecological categories or project sectors without further assessment.

8.3 Design and construction limits

- Set maximum easement, access-track, tower-pad, laydown and ancillary-site widths.
- Require use of existing disturbed corridors wherever reasonably practicable.
- Require documented consideration of spanning, narrower clearing and low-impact construction methods.
- Prohibit material footprint changes without further environmental assessment and public consultation.
- Require infrastructure to be micro-sited away from TECs, threatened-species habitat, hollow-bearing trees, rocky habitat and riparian areas.

8.4 Fauna and habitat protection

- Apply hollow-bearing-tree retention targets and staged-clearing requirements.
- Restrict clearing during relevant breeding, nesting and roosting periods.
- Require fauna spotter-catchers with stop-work authority.
- Require species-specific protocols for gliders, koalas, owls, microbats, frogs, turtles, reptiles and rocky-habitat fauna.
- Require salvage and reinstatement of logs, rocks, hollows and other habitat resources where ecologically appropriate.
- Exclude blasting and high-vibration work near karst, caves and sensitive breeding habitat unless an independently reviewed assessment demonstrates acceptability.

8.5 Connectivity

- Approve the Connectivity Strategy before clearing that may sever a corridor.
- Specify minimum retained-corridor widths, vegetation structure and canopy-gap limits.
- Require connectivity measures to be operational before adjoining habitat is cleared.
- Require independent performance monitoring based on species use, not merely completion of structures.
- Establish corrective-action and additional-offset triggers if connectivity targets are not achieved.

8.6 Indirect and operational impacts

- Apply enforceable controls for weeds, pathogens, washdown, fire, erosion, sediment, dust, noise, lighting and chemicals.
- Establish low vehicle-speed zones and restrictions on dawn, dusk and night travel through sensitive habitat.
- Require fauna-collision risk mapping and bird-diverter installation in high-risk locations.
- Regulate ongoing vegetation management, including hazard-tree removal and herbicide use.
- Require approval for removal of any additional hollow-bearing tree during operation.
- Impose incident notification and ecological-response requirements.

8.7 Offsets

- Require the final credit liability to be calculated from the approved, field-verified footprint.
- Secure legally enforceable offsets before the corresponding impact occurs.
- Require like-for-like and ecological-equivalence outcomes except where a departure is expressly lawful and scientifically justified.
- Demonstrate additionality, permanence, management funding and geographic relevance.
- Prohibit reliance on a future SODA alone as evidence that the obligation has been discharged.
- Prohibit a payment-only pathway unless lawful, transparently justified and demonstrated to achieve an ecologically appropriate outcome.
- Publish the offset register, retirement evidence, stewardship agreements and implementation status.
- Publish the offset register for the prior route for public scrutiny and comparison.

8.8 Independent oversight and transparency

- Appoint an independent biodiversity auditor and independent project ecologist approved by the Planning Secretary.
- Give those officers authority to stop work.
- Require annual independent audits and public reporting.
- Publish clearing registers, incident reports, monitoring data, corrective actions and offset progress.

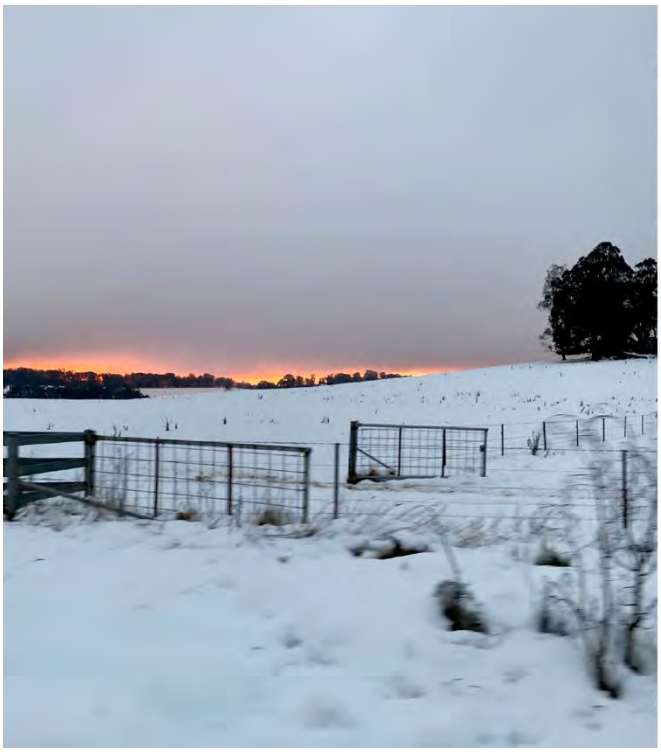
- Notify agencies and affected stakeholders promptly of exceedances and material discoveries.
- Establish a transparent complaints and compliance mechanism.

8.9 Adaptive management and enforcement

- State objective, numerical performance criteria.
- Set early-warning, corrective-action and stop-work thresholds.
- Prescribe timeframes for investigation and remediation.
- Require approval of material adaptive responses by the Planning Secretary.
- Prevent adaptive management from authorising impacts above approved clearing limits.
- Require additional avoidance, rehabilitation or offsets where performance criteria are not met.
- Impose rehabilitation security sufficient to fund corrective work and long-term monitoring.

8.10 Cumulative impacts and Commonwealth consistency

- Require regional cumulative-impact monitoring in cooperation with other REZ and transmission proponents.
- Monitor combined effects on key TECs, populations, corridors and offset markets.
- Review conditions where regional thresholds are approached or exceeded.
- Ensure NSW conditions are consistent with, and do not undermine, Commonwealth MNES conditions.
- Require compliance reporting capable of being used by both NSW and Commonwealth regulators.





9 | Information Required Before Determination

Required information	Minimum content	Status disclosed by EIS
Final project description	Fixed or tightly bounded infrastructure and impact envelope	Further refinement and micro-siting proposed
Survey coverage register	Property, date, method, season, effort, limitations and results	Approximately 54% of project area surveyed
Outstanding survey program	Species, locations, seasonal windows and completion dates	Further targeted and access-dependent surveys proposed
Final vegetation mapping	Field-verified PCT, condition, TEC status and polygon metadata	Inaccessible-area mapping not field verified
Final threatened-species mapping	Recorded populations, assumed habitat, breeding resources and confidence	Numerous assumed presences
SAII assessment	Entity-specific application of every relevant cl 6.7 principle and May 2026 guidance	Further survey may change number and extent
MNES assessment	Separate species/community impact statements and significant-impact analysis	Based partly on incomplete field data
Alternatives assessment	Route, site, width, technology and construction alternatives matrix	Broad avoidance narrative provided
Prior Route EIS	Prior proposed route EIS should be completed and fully evaluated against the new proposed route.	Undisclosed
Final clearing schedule	Caps by PCT, TEC, species habitat, sector and clearing category	Footprint to be revised
Connectivity design	Mapped corridors, specifications, target species and performance criteria	Strategy deferred
Indirect-impact analysis	Impact zones, pathways, durations, thresholds and residual risk	Substantial reliance on management measures
Cumulative-impact analysis	Transparent project list, combined clearing and regional thresholds	Cross-reference to other sections/appendices
Offset feasibility plan	Credit availability, matching, timing, security and contingency	Future SODA proposed
Final management plans	Objective criteria, hold points, stop-work triggers and reporting	Multiple plans deferred
Independent peer review	Review of methodology, mapping, SAII, MNES, cumulative impacts and credits	Not demonstrated in the material reviewed
Reconciliation report	Version-controlled comparison of exhibited and revised data	Required after revision
Public re-exhibition package	Revised EIS, BDAR, maps, MNES and peer-review reports	Not yet available

Conclusion

The EIS identifies potentially extensive impacts on native vegetation, threatened ecological communities, threatened species, habitat connectivity and MNES. At the same time, it confirms that material survey, design, impact-assessment and mitigation work remains unfinished.

The scale of the proposed impact does not permit essential questions to be left to assumptions, post-exhibition revision or post-approval management. Conservative credit calculations are not a substitute for knowing what is present, understanding its ecological importance, identifying avoidance opportunities and determining whether proposed impacts may be serious, irreversible or significant.

For those reasons, the submitter requests:

1	**Refusal of the project in its current form.**
2	**Alternatively, suspension of determination pending complete surveys, redesign, a revised EIS and BDAR, updated SAII and MNES assessments, independent peer review and public re-exhibition.**
3	**Full EIS comparison - proposed Walcha to Bayswater Transmission Line to past proposed route and the existing New England Highway transmission corridor, including:** • biodiversity credits • comparison on the impacts to biodiversity.
4	**If approval is ultimately contemplated, the stringent outcome-based conditions and hold points specified above.**

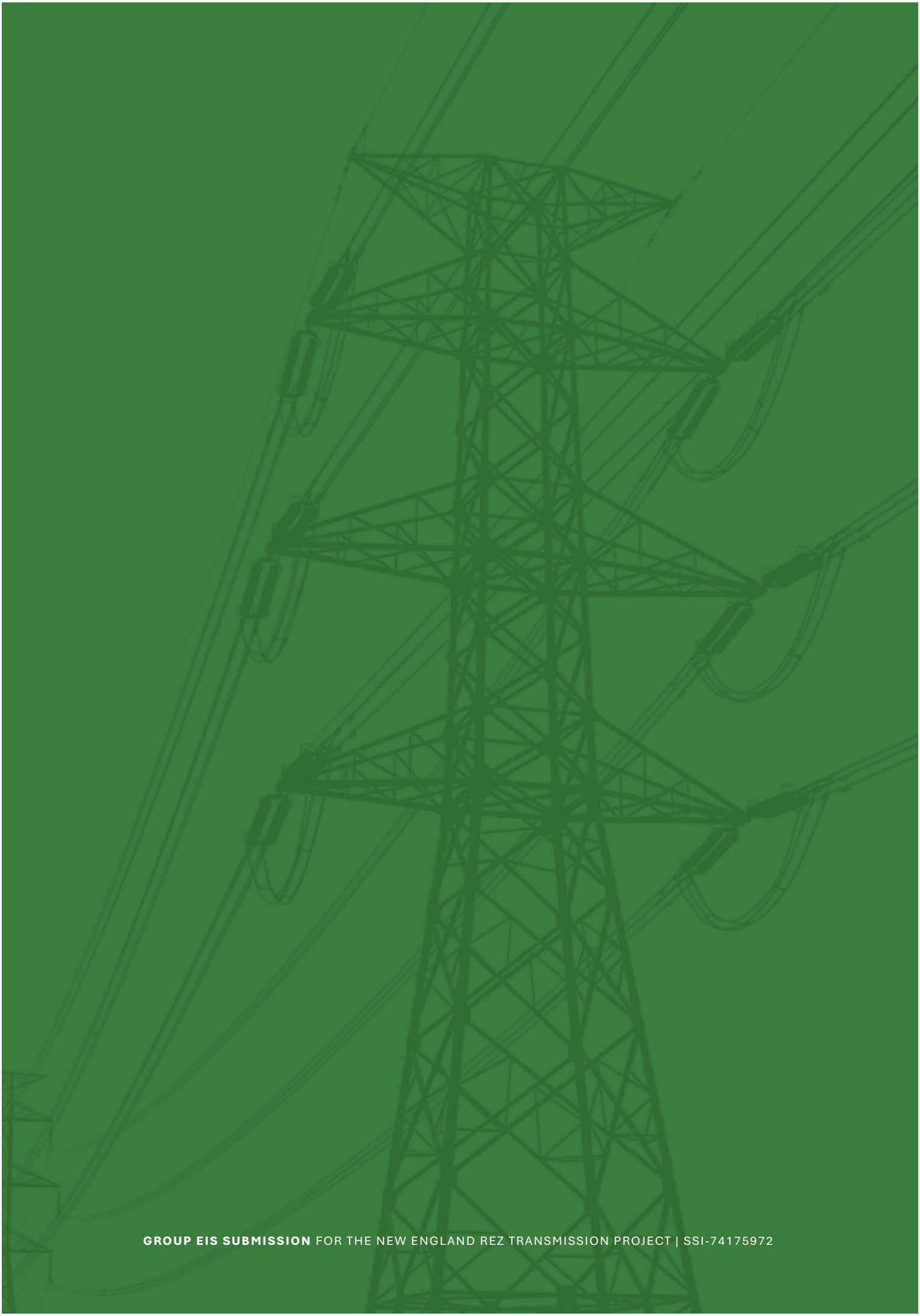
The submitter respectfully requests that this objection be considered in the Department's assessment report and by the relevant NSW decision-maker.

The submitter **reserves the right to supplement this objection** when the revised BDAR, further survey results, Submissions Report, Amendment Report, preferred infrastructure report, agency advice or additional MNES material becomes publicly available.

SECTION 4

Timor Caves, Barry Karst and Cave-dwelling Bats

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 4

Timor Caves, Barry Karst and Cave-dwelling Bats

Key issues we have found ...



Cave locations remain unverified

The assessment relies on incomplete cave mapping, leaving the position, depth and condition of caves beneath proposed works inadequately understood.



Bat conclusions precede data analysis

Recorded bat survey data remains unanalysed, yet the assessment reaches conclusions about threatened species and risks of serious, irreversible impacts.



Bat habitat extends beyond caves

Bat habitat mapping relies on narrow buffers, without adequately assessing wider feeding areas, movement routes and connections between occupied roosts.



Haul traffic threatens occupied roosts

Sargeants Gap Road would carry construction traffic near occupied bat roosts, without adequate assessment of noise, vibration, dust and lighting.



Cave groundwater studies are missing

Runoff and spills could enter cave waterways, while groundwater investigations and controls tailored to these vulnerable underground systems remain deferred.



Survey and protect before approval

Complete cave and bat surveys, analyse existing data, set protective buffers and publicly exhibit the revised assessment before granting approval.

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

Read in more detail >







> Before granting approval, a complete set of cave and bat surveys must be completed

SECTION **4**

Timor Caves, Barry Karst and Cave-dwelling Bats

EXECUTIVE SUMMARY

The EIS does not meet the Planning Secretary's Environmental Assessment Requirements (SEARs) for the Timor and Barry karst systems and the four threatened cave-dwelling bats that depend on them. The SEARs require the Biodiversity Development Assessment Report (BDAR) to assess all prescribed impacts (karst, caves and cliffs) in accordance with the Biodiversity Assessment Method, to assess the impacts of transport route road upgrades, and to assess serious and irreversible impacts under BAM section 9.1. The BDAR concludes that impacts are 'negligible' without having entered or surveyed a cave, on a mapped extent it admits is incomplete, with bat detector data it states has 'not yet been analysed', and with the presence of two of the four species decided by an expert report and the third 'assumed'.

The same caves and the same four bats were before the Department and the Independent Planning Commission in the Hills of Gold Wind Farm case (SSD-9679), 8 km away. There, the Department and the Biodiversity Conservation and Science Group accepted that the development corridor was unlikely to support breeding habitat only after turbines had been removed and relocated so that, in the proponent's words, the potential for a direct serious and irreversible impact on cave-dwelling microbats had 'been avoided through the removal and relocation of specific turbines'. The NE REZ EIS asks the Minister to accept the same conclusion on a desktop review and a promise to investigate after approval. The precautionary principle is engaged on the EIS's own words and has not been applied. The karst and bat assessment must be completed and the EIS re-exhibited before determination.

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SEARs requirements not met

> Page references: BDAR pages are PDF pages of Technical Report 1; main EIS pages are PDF pages of EIS-02 (printed page = PDF page – 35).

SEARs requirement	What the SEARs say	What the EIS does
Biodiversity: BDAR method	The BDAR must 'document the application of the avoid, minimise and offset framework including assessing all direct, indirect and prescribed impacts in accordance with the BAM'	Karst assessed by 'desktop review' of speleological society information, contour mapping and 1:500k geology (TR01 p. 98); 'No notable caves were observed within the project area' (p. 215); Barry extent 'has not been confirmed' (EIS-02 PDF p. 749)
Biodiversity: SAII	The BDAR must 'include an assessment for serious and irreversible impacts (SAII) in accordance with Section 9.1 of the BAM'	SAII polygons for the large-eared pied bat and large bent-winged bat rest on bat detector data that 'has not yet been analysed' (pp. 560, 579), presence by 'Expert Report' or 'Assumed present' (pp. 561, 579, 627), and a 100 m buffer around an incomplete mapped extent
Biodiversity: ancillary infrastructure	The BDAR must 'assess the impacts associated with all ancillary infrastructure, including the transport route road upgrades'	The Sargeants Gap Road haul route is to be widened 300 m from a known winter roost in Main Cave (p. 773); no bat-specific noise, vibration or lighting assessment of the upgrade against the roost caves; vibration assessed on a smooth road (TR09 p. 84) the traffic report says will degrade (TR07 p. 139)
Biodiversity: survey	Targeted surveys per the Commonwealth survey guidelines for threatened bats (TR01 p. 89) and BAM survey requirements	No cave entrance inspection, harp trapping or emergence count at Timor or Barry is reported; the eastern cave bat has 'No surveys completed… within the survey window of November – January' (p. 627)
Water and Soils: groundwater	Assessment of impacts on 'groundwater aquifers and groundwater dependent ecosystems having regard to the NSW Aquifer Interference Policy'	Timor Caves hold streams and stygofauna; works 'could theoretically result in… altered hydrological processes and water quality' (pp. 772, 774); no karst groundwater investigation; GW5 defers it to detailed design
General Requirements: consistency	'consistency in information presented in the EIS and all technical reports'	Karst 'avoided' (EIS-02 PDF pp. 91, 307; App B) while the alignment and tracks 'intersect the Manning Group Limestone Beds, which are understood to host the Barry caves system' (p. 749); Timor limestone both 'Permian' and 'Devonian' on one page (TR01 p. 215)
Engagement	Report consultation undertaken and how it informed the design	NHVSS was met once, online, on 8 December 2025, and the NSW Karst Management Committee on 4 November 2025 (TR01 p. 94); nothing either body said is reported

> Table ES1 **- SEARs requirements not met for karst and cave-dwelling bats**

Severe deficiencies

- **Conclusions before data.** The BDAR records 1,291 recorder-nights for the large-eared pied bat and 902 for the large bent-winged bat, each with the note '(Note: ultrasonic data has not yet been analysed)' (TR01 pp. 560, 579). The SAII findings for both species were reached before the survey data was examined.
- **No cave has been surveyed.** Cave extent was 'predicted' by digital modelling and a desktop review; 'the exact location of the caves, depth of cover to the proposed road widening… is not known at this stage' (EIS-02 PDF p. 650). The Hills of Gold record shows the published cave index undercounts Timor by a factor of four (23 caves in the 1985 Australian Karst Index against 89 documented by NHVSS in 2024 and 95 now).
- **Presence assumed.** The large bent-winged bat is 'Assumed present', no expert is named for it, and its polygon is borrowed from the expert report for two other species on the basis of 'similar breeding requirements' (pp. 579, 902).
- **Foraging counted to 2 km only.** The BDAR itself says these bats hunt 'above the tree tops' in forest and disperse 'within approximately 300 km' of maternity caves (p. 578), and that the karst systems form 'a wider ecological network, with mobile bat species utilising multiple roost sites' (p. 215). The polygons count foraging habitat within 2 km of the caves and nothing beyond: 2,063.55 ha of suitable habitat becomes 20.54 ha for the large-eared pied bat; 1,181.46 ha becomes 0.1 ha for the large bent-winged bat (pp. 561, 579).
- **A roost 300 m from a haul road.** The large bent-winged bat winter roost in Main Cave is 'about 300 m north-west of Sargeants Gap Road' (p. 773), the road the project will widen for construction traffic. NHVSS advises that most caves within 300 m of the road hold permanent roosts (Main, Hill, Belfry and Helictite caves). The EIS calls the impact 'negligible' and 'minor'.
- **Barry assessed on an extent the EIS admits is incomplete.** 'The full extent of the Barry caves system has not been confirmed'; the alignment and access tracks cross the limestone that hosts it (EIS-02 PDF pp. 746, 749).
- **Everything that would answer these points is deferred.** GW5 (geotechnical and geophysical investigation), NV12 and the 'unknown extents of karst… in inaccessible land' are left to detailed design, after the decision that gives the project its planning authority.

We ask that the karst and bat assessment be completed before determination, that the revised BDAR be publicly re-exhibited, and that the Minister refer the assessment to the Independent Planning Commission for advice and a public hearing, because the material on these matters needs independent testing.



> Figure 1 – **Timor Caves**

Deficiencies

The EIS does not presently demonstrate that the prescribed impacts on the Timor and Barry karst systems, or the serious and irreversible impacts on cave-dependent bats, have been assessed in accordance with the BAM as the SEARs require.

In particular, the EIS does not adequately resolve:

- the location, number and extent of caves at Timor and Barry within 100 m, 300 m and 2 km of the works (TR01 p. 215; EIS-02 PDF pp. 650, 749);
- the presence or absence of maternity and winter roosts in those caves, which has been concluded from an absence of records rather than survey (TR01 p. 773);
- the analysis of 2,193 recorder-nights of acoustic data collected for the two SAII bat species (TR01 pp. 560, 579);
- the foraging range of each of the four cave-dwelling species and the habitat that falls within it (TR01 pp. 561, 578, 579);
- the noise, vibration, dust and lighting effects of widening and using Sargeants Gap Road as a haul route on the roost caves within 300 m of it (TR01 p. 773; TR09 p. 84);
- the karst groundwater system at Timor, its stygofauna and its pathways from road, laydown and helipad runoff (TR01 pp. 772, 774; EIS-02 PDF p. 748);
- whether the alignment and access tracks at Barry sit on cave-bearing limestone (EIS-02 PDF p. 749); and
- what the NSW Karst Management Committee and NHVSS told EnergyCo, and what changed as a result (TR01 p. 94).

1 | The karst has not been surveyed

1.1 Evidence

The BDAR describes its karst method as 'Desktop review of Newcastle & Hunter Valley Speleological Society information relating to karst systems at Barry and Timor', contour and elevation mapping, and 1:500k surface geology (TR01 p. 98). In the field, 'No notable caves were observed within the project area, however digital modelling to map the predicted extent of caves and cliff lines within 10 km of the project area identifies widespread examples' (p. 215).

The BDAR recognises what is at stake: the Timor and Barry systems 'are recognised as highly sensitive features due to their ecological, geological and hydrological values. They are known to provide habitat for threatened micro-bats and cave invertebrates (stygofauna) and sensitive speleothems' (p. 215). At Timor, 'about 4.6 ha of the subject land that encompasses a 3.3 km long section of Sargeants Gap Road, occurs above the known (mapped) extent of karst', and impacts 'could theoretically result in localised surface subsidence or collapse, altered hydrological processes and water quality (surface and groundwater), and/or localised degradation and damage of surface karst' (pp. 772, 774). 'The exact location of the caves, depth of cover to the proposed road widening, geotechnical condition of the caves and presence of potentially vibration sensitive karst formation such as helictites is not known at this stage' (EIS-02 PDF p. 650).

At Barry, the karst 'has not been as thoroughly mapped or publicly documented as Timor Caves' (TR01 p. 215); 'the full extent of the Barry caves system has not been confirmed'; the known extent was 'provided to EnergyCo by the speleological society'; and 'portions of the transmission alignment and access tracks north-west of the known Barry caves extent intersect the Manning Group Limestone Beds, which are understood to host the Barry caves system'.

> Source: EIS-02 PDF pp. 746, 749

Topic	What is said	Where
How karst was assessed	'Desktop review of Newcastle & Hunter Valley Speleological Society information relating to karst systems at Barry and Timor'; contour mapping; 1:500k surface geology	TR01 p. 98
Field observation	'No notable caves were observed within the project area, however digital modelling to map the predicted extent of caves and cliff lines within 10 km of the project area identifies widespread examples'	TR01 p. 215
Timor Caves	'the project area intersects with one karst environment in which various cave systems have been mapped… Timor Caves'; described as 'Permian limestone units of the southern Sydney Basin' and, five lines later, as 'Devonian limestone outcrops within the headwaters of the Isis River'	TR01 p. 215
Barry	'An additional area of karst has been identified by the Newcastle and Hunter Valley Speleological Society at Barry, although this karst area has not been as thoroughly mapped or publicly documented as Timor Caves'; 'available information indicates that it comprises a network of caves that support important biodiversity values, including roosting habitat for micro-bats'	TR01 p. 215
Barry extent	'the full extent of the Barry caves system has not been confirmed'; the known extent was 'provided to EnergyCo by the speleological society'; 'portions of the transmission alignment and access tracks north-west of the known Barry caves extent intersect the Manning Group Limestone Beds, which are understood to host the Barry caves system'	EIS-02 PDF pp. 746, 749
Timor cave locations	'The exact location of the caves, depth of cover to the proposed road widening, geotechnical condition of the caves and presence of potentially vibration sensitive karst formation such as helictites is not known at this stage'	EIS-02 PDF p. 650
Works over karst	'about 4.6 ha of the subject land that encompasses a 3.3 km long section of Sargeants Gap Road, occurs above the known (mapped) extent of karst'; impacts 'could theoretically result in localised surface subsidence or collapse, altered hydrological processes and water quality (surface and groundwater), and/or localised degradation and damage of surface karst'	TR01 pp. 772, 774
Threatened bats	Large-eared pied bat, little bent-winged bat, eastern cave bat and large bent-winged bat 'recorded or predicted to occur in the subject land' and 'potentially occupy these structures for roosting'	TR01 p. 773
Breeding roosts	'No maternity roosts are known from the subject land. A winter roost for the large bentwing-bat… is known from Main Cave in Timor Caves (NSW OEH 2011b), located about 300 m north-west of Sargeants Gap Road. Additional winter roosts may occur in caves or suitable rocky areas in inaccessible areas'	TR01 p. 773
SAII polygon, large-eared pied bat	'The species expert has identified the Timor karst system as the only potential breeding habitat (caves) within or adjoining the project area'; breeding habitat = 100 m buffer; foraging/roosting = 2 km buffer; 0.18 ha directly impacted on Sargeants Gap Road; 2,857.67 ha of potential habitat 'avoided'	TR01 pp. 890–891
SAII polygon, eastern cave bat and others	'The species expert has identified the Timor and Barry Karst Systems as the only potential breeding habitat (caves) within or adjoining the project area'	TR01 pp. 561, 627
Large bent-winged bat ecology	'Populations form discrete groups centred on a maternity cave that is used annually in spring and summer… At other times of the year, populations disperse within approximately 300 km of these maternity caves'	TR01 p. 578

Conclusion	'the project is expected to result in negligible impacts to mapped karst, caves, crevices, cliffs, rocks or other geological features of significance'	TR01 p. 773
What is deferred	'EnergyCo will seek geotechnical and vibration advice to inform the construction vibration limits'; measures 'to mitigate impacts on any unexpected areas of karst identified in inaccessible areas'; App F GW5, NV12 → HH13	TR01 pp. 773–774; EIS-03 App F
Consultation	NSW Karst Management Committee, 4 Nov 2025 (online); NHVSS representative, 8 Dec 2025 (online). Appendix E records 'engagement with… the Newcastle and Hunter Valley Speleological Society' as the response to community concern; no content of that engagement is reported	TR01 p. 94; EIS-02 PDF p. 231
Literature relied on	Lishmund et al. (1986) The Limestone Deposits of NSW; Webb et al. (2023); Rutledge (2008) Timor Caves; NSW OEH (2011b, 2012b, 2013)	TR01 pp. 89, 1096, 1104

> Table 1 **- What the EIS and BDAR say about the karst**

1.2 EIS shortcoming

The SEARs require the BDAR to assess 'all direct, indirect and prescribed impacts in accordance with the BAM'. Karst, caves, crevices and cliffs are a prescribed impact under clause 6.1 of the BC Regulation. A prescribed impact cannot be assessed on a predicted extent that the assessor concedes is incomplete and imprecise, and the BDAR's conclusion that the project 'is expected to result in negligible impacts to mapped karst' (p. 773) is a conclusion about the map, not the caves.

The Hills of Gold record shows how far short such a map falls. In that case NHVSS put on the record 89 documented caves at Timor against 23 in the 1985 Australian Karst Index the proponent's consultant relied on, 'extensive roosting caves' at Barry, 12 bat species at Timor, and caves still being found (Eyrie Cave, 2021; a new crustacean in Lake Cave). The proponent's own geomorphologist conceded that LiDAR and orthophotography 'cannot be conclusive in identifying (or dismissing)' potential habitat. NHVSS now documents 95 caves at Timor with about 12 more under investigation, 2 at Barry, about 170 at Glenrock and 9 at Crawney Pass (NHVSS, personal communication, October 2026).

The precautionary principle (EP&A Regulation s 193(a)) is engaged on the EIS's own words: a threat of serious or irreversible harm that the BDAR describes, and scientific uncertainty that it admits. In the Timor quarry case, Newcastle & Hunter Valley Speleological Society Inc v Upper Hunter Shire Council and Stoneco Pty Ltd [2010] NSWLEC 48, Preston CJ held that a scientifically plausible possibility of caves and cave fauna was enough to activate the principle and that lack of full scientific certainty was not a reason to postpone protective measures (at [174]–[179]). The result was a year of cave and subterranean fauna monitoring before any blasting, an independent expert panel and a cave discovery protocol ([2010] NSWLEC 104). The NE REZ EIS reaches 'negligible' first and promises the investigation (GW5) afterwards.

1.3 Consequences

If approval issues on this material, the first survey of the caves beneath and beside the works will be done by the contractor under a management plan, after the decision. A cave or roost found then can only be managed, not avoided, and the public will have had no opportunity to comment on it.

> POSITION SOUGHT

1. Before determination, a geophysical and geotechnical survey of the full 3.3 km of Sargeants Gap Road over karst and of the Manning Group Limestone crossing at Barry, with cave mapping by NHVSS or an accredited speleological surveyor, published and re-exhibited.

2. The 'mapped extent' of karst at Timor and Barry used for the SAII polygons to be published with its source, date and author, and reconciled with the NHVSS cave database.

3. Any tower, access track or ancillary site found to lie on karst at Barry to be relocated off it as a modification under s 5.25 with public exhibition, not under a management plan.

2 | The cave-dwelling bats: conclusions reached before the data

2.1 Evidence

Four threatened cave-dwelling bats are 'recorded or predicted to occur in the subject land': the large-eared pied bat (Chalinolobus dwyeri, EPBC-listed), little bent-winged bat, eastern cave bat and large bent-winged bat (TR01 p. 773). The BDAR's species expert 'has identified the Timor and Barry Karst Systems as the only potential breeding habitat (caves) within or adjoining the project area' (pp. 561, 627). Three of the four are at risk of a serious and irreversible impact.

Species	Survey effort recorded	Method used to assess presence	Polygon	Pages
Large-eared pied bat (Chalinolobus dwyeri)	48 ultrasonic recorders, 1,291 recording nights, all subregions; Hunter 14 recorders, 318 nights. '(Note: ultrasonic data has not yet been analysed)'	'Expert Report' (Lachlan McRae)	Suitable habitat 2,063.55 ha; polygon 20.54 ha roosting/foraging (2 km buffer) and 0.18 ha breeding (100 m buffer); limited to Ellerston and Tomalla subregions	pp. 13, 560–561
Eastern cave bat (Vespadelus troughtoni)	Hunter 14 recorders, 318 nights only; 'No surveys completed in the Hunter IBRA sub region within the survey window of November – January'	'Expert Report' (Lachlan McRae)	Same 100 m / 2 km construction as above	pp. 13, 626–627
Large bent-winged bat (Miniopterus orianae oceanensis)	30 ultrasonic recorders, 902 recording nights. '(Note: ultrasonic data has not yet been analysed)'	'Assumed present'; polygon borrowed from the expert for the two species above because it 'is a cave dwelling microbat with similar breeding requirements'	Suitable habitat 1,181.46 ha; polygon 0.1 ha (SAII breeding only), being road widening on Sargeants Gap Road	pp. 578–579, 902

> Table 2 - **How the BDAR assessed the SAII cave bats (TR01 survey tables)**

The BDAR's own species account for the large bent-winged bat says it 'hunts in forested areas, capturing moths and other flying insects above the tree tops', that populations 'form discrete groups centred on a maternity cave' and 'at other times of the year, populations disperse within approximately 300 km of these maternity caves' (p. 578). Of the karst generally: 'karst systems in the region function as part of a wider ecological network, with mobile bat species utilising multiple roost sites across the landscape' (p. 215).

On roosts: 'No maternity roosts are known from the subject land. A winter roost for the large bentwing-bat (Miniopterus orianae oceanensis) is known from Main Cave in Timor Caves (NSW OEH 2011b), located about 300 m north-west of Sargeants Gap Road. Additional winter roosts may occur in caves or suitable rocky areas in inaccessible areas' (p. 773). Sargeants Gap Road 'would be widened and improved to support construction traffic'; 'minor noise and vibration-related impacts may occur'; the conclusion is 'negligible' (p. 773).

NHVSS advises that most caves within 300 m of Sargeants Gap Road have permanent bat roosts, the largest being Main Cave, with Hill, Belfry and Helictite caves also permanently occupied (NHVSS, personal communication, October 2026). In the Hills of Gold case the Australian Speleological Federation recorded twelve microbat species at the Upper Hunter karsts and that 'bats have been recorded flying forty or more kilometres a night to find food' (ASF, 20 January 2024). ACKMA's concern was 'bats which roost in, and in forest around, the caves' and the loss of their insect food supply 'regardless of them being cave dwelling or forest dwelling' (ACKMA, 22 December 2023).

2.2 EIS shortcoming

The SEARs require an SAII assessment 'in accordance with Section 9.1 of the BAM'. The BDAR's SAII findings for the large-eared pied bat and the large bent-winged bat were made on acoustic data that the BDAR states has not been analysed. That is not an assessment; it is a placeholder for one.

Presence of the large bent-winged bat is 'assumed' and its breeding polygon is drawn by analogy with two other species. No expert report has been prepared for it. The only breeding-habitat conclusion in the project area therefore rests on one expert's desktop polygon for two species, extended by analogy to a third, with the acoustic data for all of them unanalysed.

The 2 km foraging buffer is unexplained. The BDAR describes highly mobile species that forage above the forest canopy and disperse hundreds of kilometres, then counts as habitat only the vegetation within 2 km of a cave. Clearing for the easement, access tracks, the Timor Crawney Road laydown and the Crawney Road helipad all lie within the foraging landscape of the Timor, Crawney Pass, Barry and Glenrock colonies and are counted as nothing. The connectivity assessment rates the Sargeants Gap Road–Timor segment 'High' for a 140 m dual-500 kV gap (TR01 pp. 836–837) but considers gliders and koalas, not bats.

'No maternity roosts are known' is a statement about records, not about the caves. The only roost the BDAR cites is from a 2011 source. No cave at Timor or Barry was entered, inspected or surveyed by harp trap or emergence count for this project. The eastern cave bat, whose survey window is November to January, has no survey within it.

The Sargeants Gap Road upgrade is a 'transport route road upgrade' that the SEARs require the BDAR to assess. A haul road widened and carrying construction traffic 300 m from an occupied winter roost, with helipad operations nearby (TR09 p. 101), has been given no bat-specific noise, vibration or lighting assessment; the vibration assessment assumes a smooth road surface (TR09 p. 84) that the traffic report says will deteriorate (TR07 p. 139).

In the Hills of Gold case the Department told the Commission that 'the area surrounding the project site is known to have high species diversity and density of microbats' (Department meeting transcript, p. 8). Four bats were identified as potential SAII entities: the large-eared pied bat, large bent-winged bat, little bent-winged bat and eastern cave bat (Assessment Report para 200). The Department and BCS accepted that 'the development corridor is unlikely to support breeding habitat for these species' only after the proponent's

Revised BDAR could state that the potential for a direct SAII to cave-dwelling microbats had 'been avoided through the removal and relocation of specific turbines from the project footprint' (Revised BDAR p. 22); six turbines (T1, T19, T23, T27, T31 and T41) were removed across two amendment reports for biodiversity reasons. The Commission then imposed a 135 m setback from Ben Halls Gap Nature Reserve (Condition A7) and a Bird and Bat Adaptive Management Plan with at least 12 months of baseline data and curtailment at a 5.5 m/s cut-in for moderate-risk turbines (Condition B28; Assessment Report para 208). The same regulator, on the same caves and bats, is being asked here to accept avoidance on a desktop review.

2.3 Consequences

The Minister's opinion under s 7.16(3) of the Biodiversity Conservation Act, whether the project is likely to have a serious and irreversible impact, cannot lawfully be formed on data the proponent has not analysed and a presence the proponent has assumed. For the Commonwealth, the large-eared pied bat is EPBC-listed (EPBC 2025/10405) and the significant-impact assessment relies on the same material; that decision is separately reviewable.

> POSITION SOUGHT

1. Analysis and publication of the 2,193 recorder-nights of acoustic data, and of the Hunter subregion survey, before determination.
2. Targeted cave-fauna survey (entrance inspection, harp trapping, emergence counts, winter and maternity seasons) of every cave within 2 km of works at Timor and Barry, with BCS sign-off, before determination.
3. A literature-based foraging range for each of the four species, the polygons redrawn to it, and the cleared vegetation within it counted and offset.
4. An expert report for the large bent-winged bat, and the species expert reports relied on for the large-eared pied bat and eastern cave bat exhibited with the revised BDAR.
5. A bat-specific noise, vibration, dust and lighting assessment of the Sargeants Gap Road upgrade and the Crawney Road helipad against the roost caves, with vibration limits and exclusion periods fixed in the conditions.
6. A bat monitoring program with 12 months of baseline data before any works over karst and raw data to BCS, modelled on Hills of Gold Condition B28.





3 | Karst hydrology, consultation and what the Hills of Gold record established

3.1 Evidence

Timor Caves are groundwater-dependent ecosystems holding streams and stygofauna (TR01 p. 215). The EIS says 'contaminants… could infiltrate karst catchments' (EIS-02 PDF p. 748) and that impacts on karst from the road upgrade 'could be permanent if unmitigated' (TR01 p. 773). No karst groundwater investigation is reported; measure GW5 commits to geotechnical and geophysical investigation after approval. In the Hills of Gold case, reports commissioned by Hills of Gold Preservation Inc from Greg Chapman and Dr Robert Banks found 'No underground water flows have been considered'.

EnergyCo met the NSW Karst Management Committee on 4 November 2025 and an NHVSS representative on 8 December 2025, both online (TR01 p. 94). Appendix E records 'engagement with… the Newcastle and Hunter Valley Speleological Society' as the response to community concern (EIS-02 PDF p. 231). Nothing either body said is reported, and no written advice from the Karst Management Advisory Committee or BCS on the karst is exhibited. NHVSS confirms the route was moved away from the Timor and Barry karst after its earlier submission, and that bat foraging and migratory ranges were not considered (NHVSS, personal communication, October 2026).

International guidance treats transmission lines on karst as a case for prior inventory and buffering. The UIS/IUCN Guidelines for Cave and Karst Protection (2nd ed., 2022) class 'electrical transmission lines' among linear infrastructures and state that 'an environmental assessment study involving the site and the immediate surroundings (a protection buffer zone) should be made prior to any installation. In this zone, a more detailed study involving inventory of caves and surface karst features should be performed in order to assess whether the project should go ahead or should seek alternative locations'; that 'the stability of nearby caves and how they relate to vibration during construction and operation' requires 'a case-by-case study'; and that 'runoff from roads… is often contaminated and tends to be directed towards drains and ultimately sinking points in karst terrains' (printed p. 60). Guideline 52: 'All feasibility studies for construction projects in karst areas should include careful examination of the planned location, a detailed environmental assessment and the size of a protective buffer zone.' Guideline 2: 'in karst catchments, surface actions result in direct or indirect impacts underground or further downstream.' Guideline 61: 'Define protection buffers for karst water sources, such as springs, wells and caves' (printed pp. 102, 105–106).

#	Deficiency	NE REZ EIS	Hills of Gold comparison	Ground
1	No cave survey	'No notable caves were observed'; extent predicted by digital modelling and a desktop review of NHVSS information	NHVSS: 89 documented caves at Timor, caves still being discovered in 2021; Biosis conceded LiDAR and orthophotography 'cannot be conclusive'	BAM prescribed impacts (karst); Reg s 193(a)
2	Barry assessed on an admittedly incomplete extent	'not as thoroughly mapped or publicly documented'; 'full extent… has not been confirmed'; alignment and tracks intersect the Manning Group Limestone 'north-west of the known Barry caves extent'	NHVSS: 'extensive roosting caves' at Barry; Barry Cave one of three known cave roosting sites in the HoG BDAR	SEARs BIO; precautionary principle
3	Breeding habitat	'No maternity roosts are known from the subject land'; large-eared pied bat	BCS would not accept 'unlikely to support breeding habitat'	BC Act s 7.16(3); BAM s 9.1

	concluded by absence of records	SAII polygon = 100 m buffer of mapped breeding habitat; 0.18 ha impacted, 2,857.67 ha 'avoided'	until turbines were removed and relocated; Department acknowledged 'high species diversity and density of microbats' around the site	
4	Foraging and roost network under-scoped	Foraging/roosting polygon = 2 km buffer; bent-winged bats 'disperse within approximately 300 km' of maternity caves (TR01 p. 578)	ASF: bats fly 'forty or more kilometres a night'; NHVSS: migratory paths between Crawney Pass, Timor and Barry; HoG BDAR named three roost sites 5–15 km apart	SEARs BIO; BAM indirect/prescribed impacts
5	Data sources old or unstated	Lishmund et al. 1986; Rutledge 2008; NHVSS material reviewed on desktop; content of the 8 Dec 2025 NHVSS meeting not reported	HoG proponent relied on the 1985 Karst Index and was shown to have missed 171 caves; NHVSS corrected the record in that case	SEARs ENG03 (report what consultation changed)
6	Bat survey effort not reported for the karst	2,695 detector-nights project-wide; no cave entrance surveys, harp trapping or emergence counts reported at Timor or Barry	ASF: 'only acoustic monitoring and for a short period'; detector range 30–100 m	BAM survey requirements; SEARs BIO
7	Hydrology of the karst not assessed	Sargeants Gap Road works 'could theoretically result in… altered hydrological processes and water quality'; Timor Caves are groundwater-dependent ecosystems with stygofauna; 'contaminants… could infiltrate karst catchments' (EIS-02 PDF p. 748); no karst groundwater investigation	HOGPI reports (Chapman; Banks): 'No underground water flows have been considered'; ACKMA on 'fissures, grikes, sinks and caves'	SEARs WAT03; Reg s 193(a)
8	Internal inconsistency	Karst 'avoided' (EIS-02 PDF pp. 91, 307; App B) vs alignment intersects the Barry limestone (p. 749); Timor limestone 'Permian… southern Sydney Basin' and 'Devonian' on one page (TR01 p. 215); Sargeants Gap Road vibration assessed on a smooth road (TR09 p. 84) the traffic report says will degrade (TR07 p. 139)	—	SEARs G06; Reg s 190(3)
9	Mitigation deferred	GW5 'investigations will be required'; NV12 → HH13; measures for 'unknown extents of karst' in inaccessible land to come	HoG: avoidance designed in before determination; 135 m setback and BBAMP with 12 months' baseline fixed in conditions	Reg s 192(1)(d)(iv)
10	Agency position not exhibited	No advice from the NSW Karst Management Advisory Committee or BCS on the karst is reproduced	HoG: BCS advice of 10 January 2023 drove the redesign	SEARs consultation requirements

> Table 3 **- Deficiencies, the Hills of Gold comparison and the ground**

3.2 EIS shortcoming

The EIS does not do what the international guidance for transmission lines on karst calls for: no cave inventory within a defined buffer, no case-by-case vibration study of the caves beside the haul road, no karst-specific runoff controls at the sinking points. The BDAR lists the OEH karst guidelines among its background documents (TR01 p. 89) but applies none of their substance to Timor or Barry.

The SEARs require assessment of impacts on 'groundwater aquifers and groundwater dependent ecosystems having regard to the NSW Aquifer Interference Policy'. A karst aquifer with known stygofauna beneath a haul road, a 165 ha laydown and a helipad has not been assessed as one. The SEARs also require the EIS to report how engagement informed the design; two meetings with the bodies that hold the only cave data for the area are recorded as dates and nothing more.

The Hills of Gold Wind Farm (SSD-9679) was approved by the Independent Planning Commission on 9 September 2024 after 1,122 portal submissions and 675 submissions to the Commission. Its record shows what the Department and BCS required when these caves and bats were last at issue: avoidance designed in before determination on BCS advice of 10 January 2023, a 135 m setback and a 12-month bat baseline fixed in conditions. It also shows the published cave data the proponent relied on missed 171 caves across the district. The NE REZ EIS relies on the same class of data and offers a later investigation in place of avoidance.

3.3 Consequences

Without a karst groundwater assessment, the surface water, erosion and spill controls for Sargeants Gap Road, the Timor Crawney Road laydown and the Crawney Road helipad are designed for ordinary catchments, not for one that drains into caves. Without the consultation record, the decision-maker cannot know whether the only cave specialists consulted agree with the BDAR's conclusions.

> POSITION SOUGHT

1. A karst groundwater investigation and a karst-specific erosion, sediment and spill protocol for Sargeants Gap Road, the Timor Crawney Road laydown and the Crawney Road helipad, approved by the Karst Management Advisory Committee, before determination.
2. Publication of what the NSW Karst Management Committee and NHVSS advised EnergyCo, and of any written advice from BCS or the Karst Management Advisory Committee on the karst assessment.
3. No vibratory compaction, blasting or heavy haulage within a buffer of any identified cave set by the survey, with vibration limits fixed in the conditions rather than left to GW5.

Questions the EIS must answer before determination

1	What is the source, date and author of the 'mapped extent' of karst at Timor and at Barry used to draw the SAII polygons, and does it include the 95 caves NHVSS has documented at Timor and the Barry caves recorded since the 1985 Karst Index?
2	What did NHVSS tell EnergyCo on 8 December 2025, and what did the NSW Karst Management Committee advise on 4 November 2025? Why is neither recorded in Appendix E beyond the word 'engagement'?
3	Has any cave at Timor or Barry been entered, inspected for bats, or surveyed by harp trap or emergence count for this project? If not, on what evidence does the species expert conclude there is no maternity roost?
4	When will the 1,291 and 902 recorder-nights of acoustic data for the large-eared pied bat and large bent-winged bat be analysed, and will the results be exhibited before determination?
5	Why is there no expert report for the large bent-winged bat, and on what survey evidence did the species expert for the large-eared pied bat and eastern cave bat conclude that no maternity roost exists at Timor or Barry?
6	What is the basis for a 2 km foraging buffer for each of the four species, given the BDAR's own description of their ecology?
7	How many caves lie within 100 m, 300 m and 2 km of the Sargeants Gap Road works, the transmission alignment at Barry and the access tracks that 'intersect the Manning Group Limestone Beds'?
8	What is the depth of cover between the Sargeants Gap Road formation and the nearest cave passage, and which caves (Main, Hill, Belfry, Helictite, Eyrie, Lake, others) lie beneath or beside the 3.3 km of works?
9	Has the karst groundwater system at Timor been assessed as a groundwater-dependent ecosystem under the Aquifer Interference Policy, and what are the pathways from road works, laydown and helipad runoff to it?
10	Is the Timor limestone Devonian or Permian? Which geological mapping was used, and has it been ground-truthed?
11	Why does the EIS conclude 'negligible' impact on karst and then commit to geotechnical and geophysical investigation (GW5) afterwards? What happens if that investigation finds a cave under the works?
12	Has BCS or the Karst Management Advisory Committee provided written advice on this EIS's karst assessment, and will it be exhibited?

> POSITION SOUGHT

The karst and cave-bat assessment has not been done: the caves have not been surveyed, the bat data has not been analysed and the only breeding habitat in the project area has been assessed by assumption. The Department and Planning Minister should not determine the project until that assessment is complete and has been publicly re-exhibited.

Accordingly, the submission seeks the following position:

1. EnergyCo should be required to complete the karst survey, the cave-fauna survey and the acoustic analysis, prepare a revised BDAR, and re-exhibit it for public comment. A Submissions Report or Amendment Report that the public cannot comment on is not an adequate substitute; the Department's own guidance says that 'in most cases, the PIR is not exhibited' (DPHI, SSI Guide Appendix E, s 1.3).
2. The Minister should refer the assessment to the Independent Planning Commission for advice and a public hearing under s 2.9 of the EP&A Act, because the material on karst and cave-dependent bats needs independent testing, as it received in the Hills of Gold case.
3. The Minister's opinion under s 7.16(3) of the Biodiversity Conservation Act should not be formed until the SAII assessment for the three cave bats rests on analysed data, a surveyed extent and an exhibited expert report.
4. If approved: cave-fauna survey with BCS sign-off before any works over karst; vibration limits, exclusion buffers and seasonal restrictions fixed in the conditions; a karst groundwater protocol approved by the Karst Management Advisory Committee; relocation of any tower, track or ancillary site found on karst at Barry as a modification under s 5.25; and a bat monitoring program with 12 months of baseline data and raw data to BCS, modelled on Hills of Gold Condition B28.
5. For the Commonwealth decision (EPBC 2025/10405): the significant-impact assessment for the large-eared pied bat relies on the same unanalysed data and unsurveyed extent and should not be accepted until they are remedied.

This is not a request that EnergyCo prove a negative. It is a request that the surveys the BDAR itself says are needed, and the data the BDAR itself says it has collected, be completed and examined before the decision rather than after it.

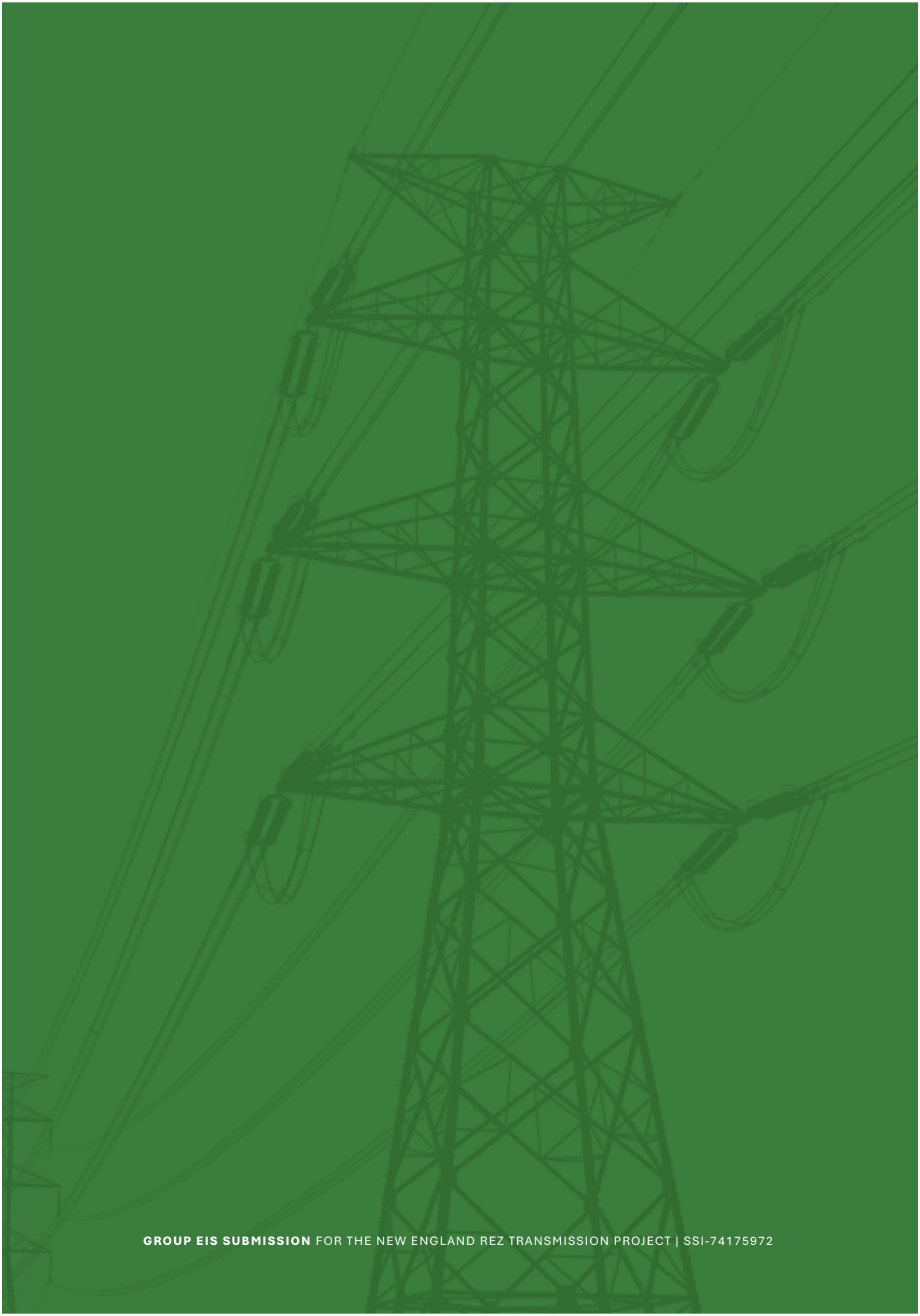
Key references

- Environmental Planning and Assessment Act 1979 (NSW), ss 2.9, 5.17, 5.25; Environmental Planning and Assessment Regulation 2021 (NSW), ss 192, 193(a).
- Biodiversity Conservation Act 2016 (NSW), s 7.16(3); Biodiversity Conservation Regulation 2017, cl 6.1 (prescribed impacts); Biodiversity Assessment Method 2020, s 9.1.
- Planning Secretary's Environmental Assessment Requirements (SEARs), SSI-74175972, amended August 2026: Biodiversity; Water and Soils; General Requirements (consistency); Engagement.
- EnergyCo, New England REZ Network Infrastructure Project EIS, October 2026: EIS-02 PDF pp. 91, 231, 307, 309, 650, 746–749; Technical Report 1 (BDAR) pp. 13, 89, 94, 98, 215, 560–561, 578–579, 626–627, 772–774, 836–837, 890–891, 902; Technical Report 7 p. 139; Technical Report 9 pp. 84, 101; Appendix F measures GW5, NV12, HH13.
- Newcastle & Hunter Valley Speleological Society Inc v Upper Hunter Shire Council and Stoneco Pty Ltd [2010] NSWLEC 48 (Preston CJ), [174]–[179], [231]; (No 2) [2010] NSWLEC 104.
- Independent Planning Commission, Hills of Gold Wind Farm (SSD-9679): Statement of Reasons for Decision, 9 September 2024 (Table 1; Section 5.4; Conditions A7 and B28); DPE Assessment Report paras 184, 193, 200, 208 as quoted in the Statement of Reasons; Revised BDAR p. 22 as quoted; Department meeting transcript, p. 8; public meeting transcripts 1–2 February 2024.
- Newcastle and Hunter Valley Speleological Society, submission to the IPC, 28 January 2024, and personal communication (M. Dalton, G. Smith), October 2026, cited with NHVSS consent.
- Australian Speleological Federation (Dr C. Buswell), letter of 20 January 2024; Australasian Cave and Karst Management Association (I. Eddison), letters of 23 January 2021 and 22 December 2023.
- Rutledge, Smith, Brainwood and Baker (2008) Timor Caves, Hunter Valley NSW; Hoye (2008) Bats at Timor (as cited in TR01 p. 1104).
- Gillieson, D.S., Gunn, J., Auler, A. and Bolger, T. (eds) (2022) Guidelines for Cave and Karst Protection, 2nd edition, International Union of Speleology and IUCN, pp. 60, 102, 105–106 (Guidelines 2, 4, 6, 41, 52, 53, 60, 61).
- NSW Department of Planning, Housing and Infrastructure, SSI Guide Appendix E – Preparing a Preferred Infrastructure Report (2026), s 1.3.
- Timor Caves, Barry Karst and Cave-dwelling Bats – Draft 04 – 1 November 2026 – prepared for Protect the Valley for the joint submission group.

SECTION **5**

Bushfires

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 4

Bushfires

Key issues we have found ...

Fire crews face access barriers	The EIS does not demonstrate how crews will reach fires beyond construction works, leaving emergency access and public safety unresolved.
Fuel assumptions lack field checks	Desktop fuel estimates lack field checks of current vegetation and farming practices, leaving local fire risks dependent on unverified assumptions.
Local brigade consultation remains unproven	EnergyCo claims local engagement, yet the community disputes brigade consultation and demands evidence that firefighting knowledge shaped assessment and design.
Local fire history is incomplete	An incomplete record of recent fires obscures how crews access threatened areas, weakening the evidence for safe emergency response planning.
Drought flight modelling needs scrutiny	The aviation study assumes a 276 metre water level; communities need clear evidence of safe operations throughout drought and drawdown.
Powerlines threaten aerial firefighting	Recorded Glenbawn flight paths vary with wind and visibility; transmission lines could obstruct manoeuvring space needed for safe water scooping.

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

Read in more detail >



> On fire, Walcha Plateau

SECTION **5**

Bushfire Risk

Part A | Environment and Community

EXECUTIVE SUMMARY

Our community considers that the New England REZ Environmental Impact Statement (EIS) fails to adequately demonstrate how the project's construction will ensure safe firefighting operations within and around the transmission lines.

The EIS contains numerous flawed assumptions based on inaccurate and inadequate research. EnergyCo has failed to show the necessary local knowledge needed to assess the ramifications of the invasive industrialisation of prime agricultural land.

Our principal concerns are:

1. **EIS fails to assess impact of bushfire mitigation surrounding project site.** EnergyCo has assessed risk 'to' and 'from' the project but fails to assess risk of how the transmission lines will affect firefighting operations in its vicinity, both during and after intended construction.
2. **Inaccurate assessment of vegetation in and around the project.** EnergyCo has based review of vegetation and fire prone areas on outdated resources as well as failing to research local land use which affects fire risk.
3. **Inadequate consultation with RFS.** EnergyCo has failed to consult with local RFS brigades nor provided meeting outcomes with RFS.
4. **Local bushfire history knowledge is greatly lacking.** EnergyCo demonstrates a lack of knowledge in bushfire history which places any assumptions of fire mitigation in question.
5. **Aerial firefighting capabilities via Lake Glenbawn severely hindered.** EnergyCo has failed to correctly assess the risks around the construction of transmission lines near this water resource.

Our community asks DPHI to require EnergyCo to demonstrate how bushfire mitigation can be conducted in a safe and effective manner in and around the vicinity of the proposed project, both during and after the intended construction.

Where acceptable outcomes cannot be demonstrated, the project must be modified accordingly. Future management plans cannot substitute for the evidence required to establish that the project is environmentally acceptable.

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1 | EIS fails to assess impact of bushfire mitigation surrounding project site.

The SEARs requires EnergyCo to assess the risks to public safety, 'paying particular attention to bushfire risks, emergency egress and evacuation'. EnergyCo has failed to address bushfire mitigation practices for bushfires within the vicinity of the project. All assessments are concentrated on bushfire risk 'to' and 'from' the project. Although mentioned, there has been no assessment on how bushfires in the vicinity of the project will be contained where the construction site obstructs access to said fires.

With the proposed project to be built in the vicinity of households, this limited scope does not address the SEARs requirement to assess the risk to public safety. EnergyCo acknowledges that all risk assessments have been generated from desktop studies. The broader community can confirm this as EnergyCo has made not engaged with local landholders or local RFS brigades who would be called upon to support any firefighting efforts throughout and after the construction period of the proposed project. EnergyCo has failed to address how ground crews will access land beyond the proposed project site where access will be severely limited during construction.

EnergyCo refers to assessing public safety through the RFS Bushfire Risk Management Plan (BFMP) for each RFS area. This project straddles two RFS areas, being the Liverpool Plains and New England. Neither RFS BFMP refers to measures to be taken when conducting firefighting activities near transmission lines in general; nor specifically to this project. It is stated clearly in the technical report that *'In considering potentially at-risk assets from a public safety dimension (as required by the SEARs) GHD has referred to the relevant BFRMPs'*, but states in section 4.2 Elevated bushfire risk communities, that all relevant BFMPs are currently 'under review'. This is in direct contradiction with each other.

Source: DPHI, Planning Secretary's Environmental Assessment Requirements, SSI-74175972, 7 April 2026, p. 3. Amended SEARs.pdf
Source: Technical Report 12 Bushfire Risk Assessment.pdf p. 6
Source: https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0004/307498/Liverpool-Range-Bush-Fire-Risk-Management-Plan-Final.pdf, 11:40am, 8.11.26
Source: https://www.rfs.nsw.gov.au/__data/assets/pdf_file/0014/2390/New-England-BFRMP.pdf, 11:41am, 8.11.26

> POSITION SOUGHT

The SEARs requirement regarding public safety has not been met as there has been insufficient study done in identifying implications to public safety of bushfires around the project. In addition, EnergyCo has referred to RFS BFRMPs for both New England and Liverpool Plains as supporting documentation despite neither referring to the project.





2 | Inaccurate assessment of vegetation in and around the project.

EnergyCo has based its entire fire mitigation risk assessment on outdated data and a broad assumption of land use. As stated in the Technical Report 12 Bushfire Risk Assessment in section 3.3 Key Data Inputs, assessments were made using data from a NSW RFS document titled 'Comprehensive Vegetation Fuel Loads (NSW RFS, 2019)' which draws data and modelling from 2004. It is also acknowledged that no field sampling has occurred.

The EIS also fails to take land use into account when determining fire risk. Farming practices include crop harvesting, rotational grazing, feedlot enterprises as well as carbon offsetting have been introduced since the 2004 data and modelling, meaning that all of the EIS forecasting regarding vegetation and its related fire risk is alarmingly incorrect.

The Bureau of Meteorology (BOM) data is fundamentally used for Bushfire Attack Level (BAL) assessments in NSW; data that has recently been proven to be inaccurate. BAL assessments consider regional fire weather history as a base and can therefore no longer be considered in any serious study.

> POSITION SOUGHT

EnergyCo needs to use more accurate and recent data in order to meet the requirements of this section. The broad approach to assessing fire risk within the region in terms of its vegetation of this project will place the public at great risk. The broad assumptions made from any current data used by EnergyCo need to be revised in order to meet any SEARs requirement in this area.

3 | Inadequate consultation with RFS.

EnergyCo maintains that 'Consultation outcomes have informed further technical assessment and design refinement, including consideration of aerial operations alongside broader bushfire management requirements' in the EIS Technical Report 12 on page 9.

The community argues the current design refinement should be deemed null and void as EnergyCo has failed to consult with local RFS brigades, local Civil Aviation Safety Authority (CASA) approved aerial firefighting instructors and affected landholders. The community also has concerns that EnergyCo has inadequately communicated with the relevant RFS command centres.

The feedback given to EnergyCo from CASA approved aerial firefighting instructors is NOT in alignment with the final assessment in the EIS. One submission stated that transmission lines need to be, at a minimum, four nautical miles from Lake Glenbawn in order for safe aerial firefighting operations to continue. This assessment has been fundamentally ignored.

In the EIS Technical Report 12, it states 'EnergyCo has sought to engage with local RFS brigades and Fire Control Centres, as well as individual landowners and Bendemeer Community Group to ensure local knowledge and operational experience is captured.' This is blatantly misleading as EnergyCo has not approached any local RFS brigades for consultation, nor has it met with individual landowners. Furthermore, highly significant 'technical assessment and design refinement' has then been attributed to these non-existent consultations.

Such blatant disregard for local knowledge and apparent deception in ignoring local expertise will seriously compromise the safety of RFS volunteers and all members of the community engaged in firefighting activities.

> POSITION SOUGHT

EnergyCo must demonstrate proactive consultation with all relevant stakeholders of the firefighting community and show that feedback has been used to adjust the project where necessary.

4 | Local bushfire history knowledge is greatly lacking.

EnergyCo's documentation of local bushfires is alarmingly incomplete. There have been several fires within the proposed project over the last ten years, as well as those within close proximity. Many of these bushfires necessitated travel by firefighters through where the proposed project is to be constructed. As it currently stands, EnergyCo has not adequately considered firefighting vehicles travelling through the proposed construction corridor during construction.

> POSITION SOUGHT

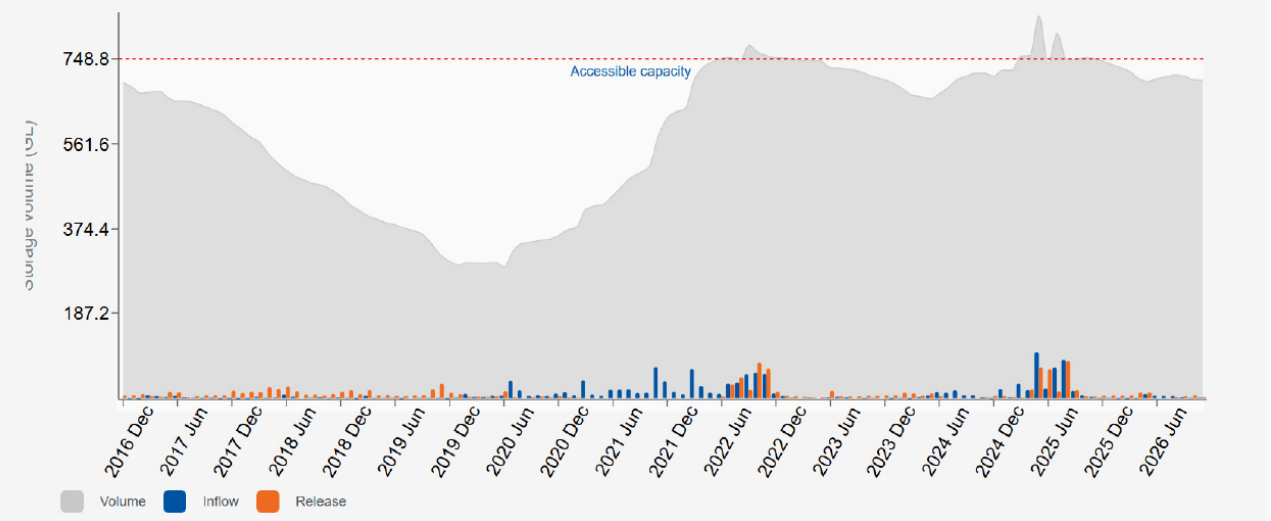
EnergyCo has limited understanding of local bushfire history which needs to be addressed in order for lifesaving assessments to be formulated. Once again, the SEARs requirement regarding public safety is not met.

5 | Aerial firefighting capabilities via Lake Glenbawn severely hindered.

5.1 A critical failure to assess drought conditions

The EIS aviation assessment adopts a Lake Glenbawn water level of 276 metres Australian Height Datum (AHD), approximately equivalent to the dam being 100% full. Section 4.5(h) of the Lake Glenbawn Aviation Technical Note expressly identifies this as the assumed water level unless otherwise specified. The assessment then relies on its flight-path calculations to conclude that the proposed transmission alignment will not adversely affect the safety of water-scooping operations.

Using a full dam as the basis for these conclusions, without demonstrating that they remain valid at realistic drought levels, is a serious error of judgement by the EIS authors. A full dam cannot be assumed during a bushfire emergency. Prolonged dry conditions can leave the water surface substantially lower precisely when communities need effective aerial firefighting.



> Graph 1. Glenbawn Dam Historical Storage Volume, Inflow and Release
Source: https://waterinsights.waternsw.com.au/12801-hunter-regulated-river/storage#AMSRecent

Low storage is a foreseeable operating condition that must be assessed. EnergyCo's own published information acknowledges that Glenbawn's storage varied between approximately 40% and 55% during 2019–2021. An assessment intended to protect firefighting operations must demonstrate safety under those conditions.

The published Glenbawn Dam map shows the scale of the change in water elevation:

Glenbawn Dam Volume and AHD comparison			
Dam Volume	100%	60%	30%
mADH	276	260	248.5

Source: https://www.nsw.gov.au/sites/default/files/2021-07/16-glenbawn-dam.pdf

These are substantial differences in the elevation of the surface from which aircraft collect water and begin climbing, and towards which they descend on approach.

5.2 Lower water levels threaten clearance and usable scooping distance

The consequences of this assumption are particularly serious in the assessment of operations at the eastern end of the lake. One worked approach in the technical note places the aircraft at approximately 385 metres AHD when crossing the transmission alignment, above a tower reaching 354.1 metres AHD. That provides approximately 31 metres of vertical separation, close to the assessment's adopted minimum of 30.5 metres.

At the assumed full-dam level, this approach provides approximately 871 metres of water-scooping distance. The report identifies an observed average scooping distance of approximately 700 metres for these eastern operations. These calculations depend on the assumed water elevation and the geometry of the approach.

When the water surface falls, the transmission towers and wires remain at the same height. The consequences for the flight path cannot be ignored.

If an aircraft follows the same approach angle towards the same touchdown location on a lower water surface, its calculated approach path also falls. This reduces clearance over the transmission infrastructure and could bring the aircraft dangerously close to the towers and wires, below the minimum separation adopted in the assessment.

If the aircraft instead maintains its clearance above the transmission infrastructure, it must descend farther before reaching the lower water surface. This moves the touchdown point farther along the approach and can consume the distance available for scooping. Falling storage also changes the shoreline, water depth and usable scooping area, requiring the entire operation to be reassessed.

The EIS must establish how safe approach, scooping and departure operations remain possible as the dam falls. The published full-dam calculations do not answer that question. A successful calculation at 276 metres AHD cannot establish that the same operation remains safe when the water surface is 16 or 27.5 metres lower.

This omission undermines the assessment's safety conclusions. It leaves unresolved whether pilots can maintain adequate separation from the transmission infrastructure while retaining sufficient water and distance to complete a safe and effective scoop.

The technical note itself describes its analysis as preliminary and warns that it should "not be relied upon for any decisions relating to actual flight performance and safety". That qualification makes it particularly unacceptable to treat the assessment as sufficient assurance that aerial firefighting will remain unaffected.

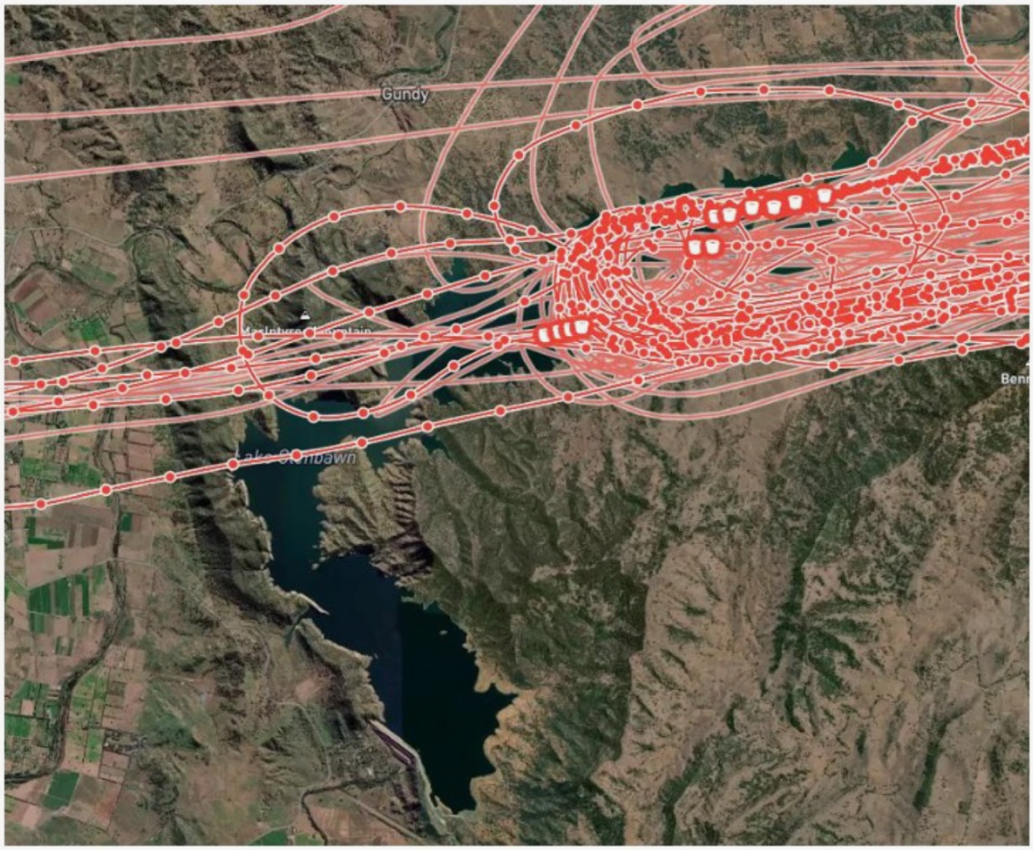
5.3 Experienced pilots' warnings require a substantive response

The operational evidence provided by Harley McKillop reinforces the seriousness of this omission. Mr McKillop is an experienced aerial firefighting pilot, CASA-approved instructor and examiner. His submission describes repeated scooping operations in extreme temperatures, strong winds and smoke, with high workloads and little room for error.

His recorded flights from 1–9 December 2025 demonstrate extensive use of Lake Glenbawn's eastern reaches for approaches, scooping and departures. This evidence shows why an assessment must account for the operating space pilots actually require as conditions change.

Attachment A - Flight tracks and scooping zones for a single aircraft (VH-AP8) for the period 1st to 9th December 2025. The 'bucket' symbol indicates each individual scoop throughout the day.

1/12/2025



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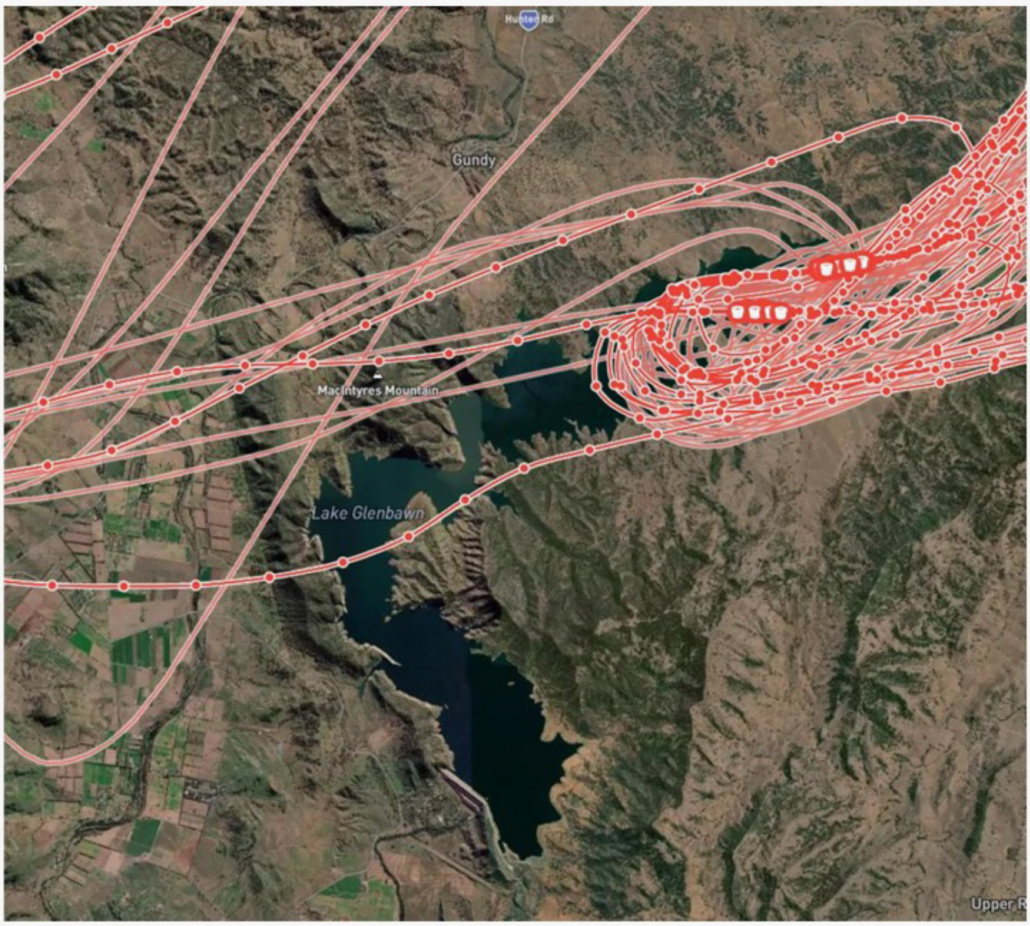

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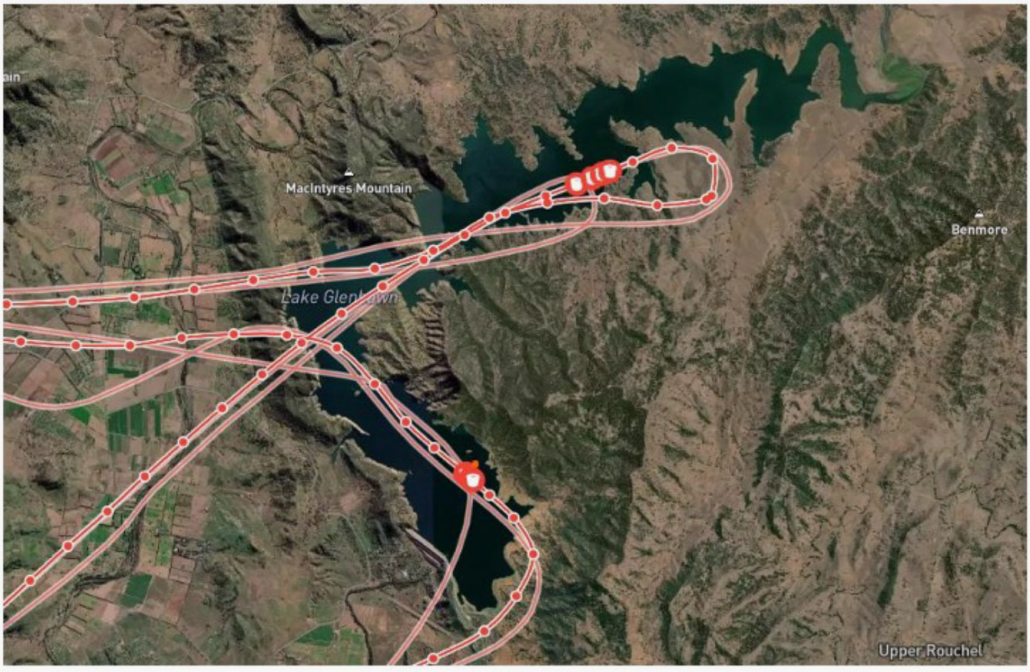

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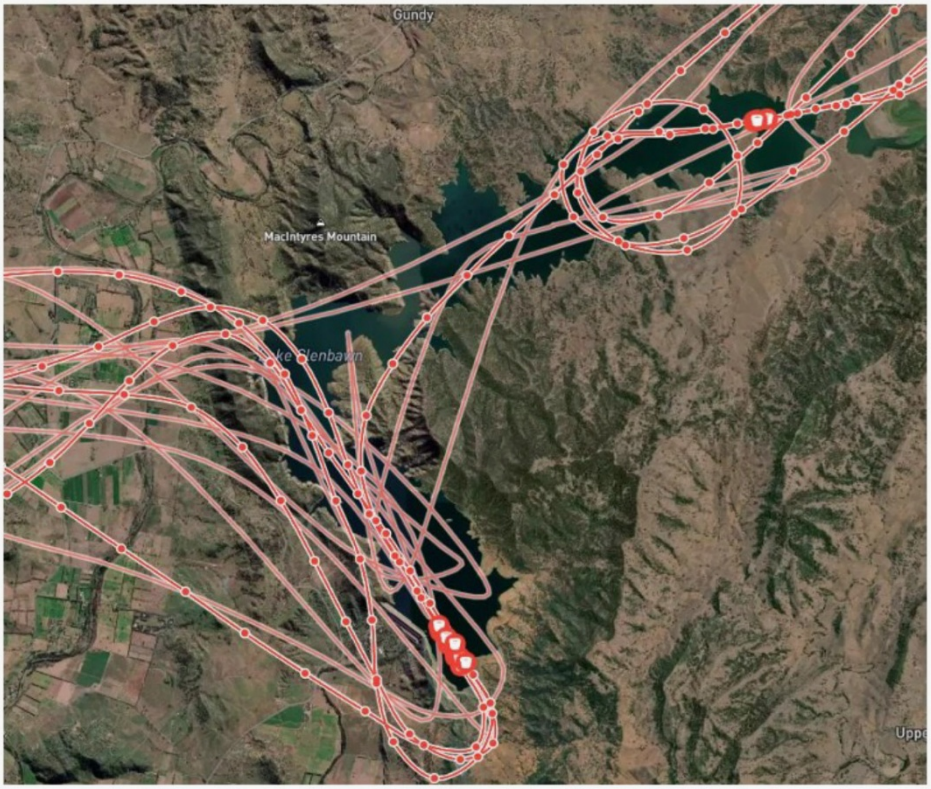

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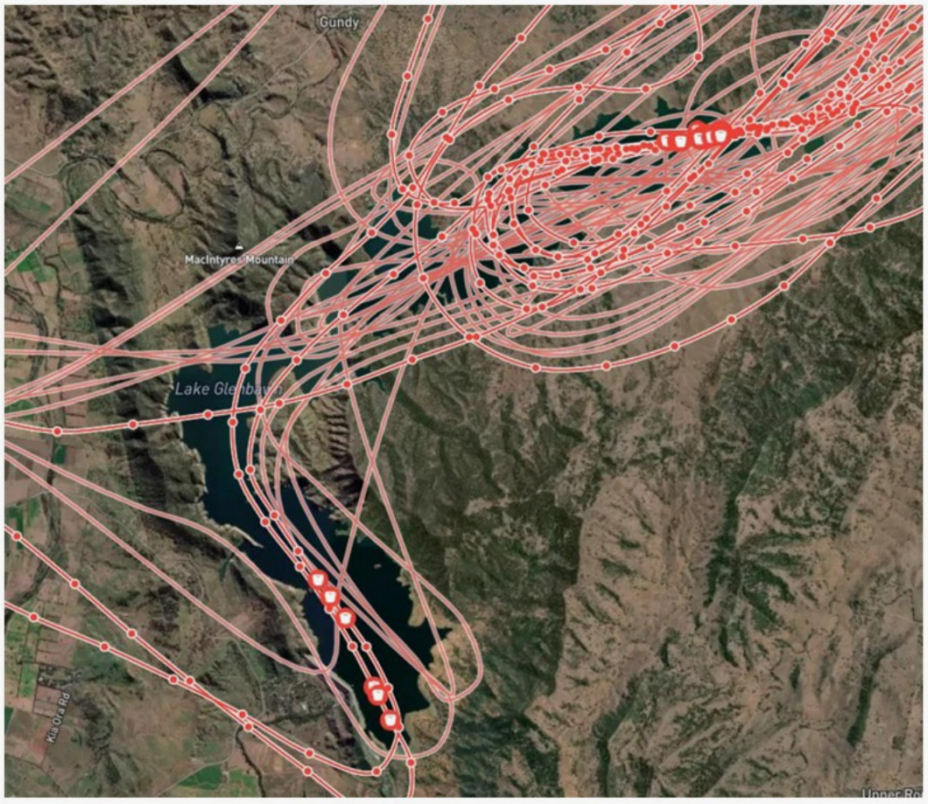

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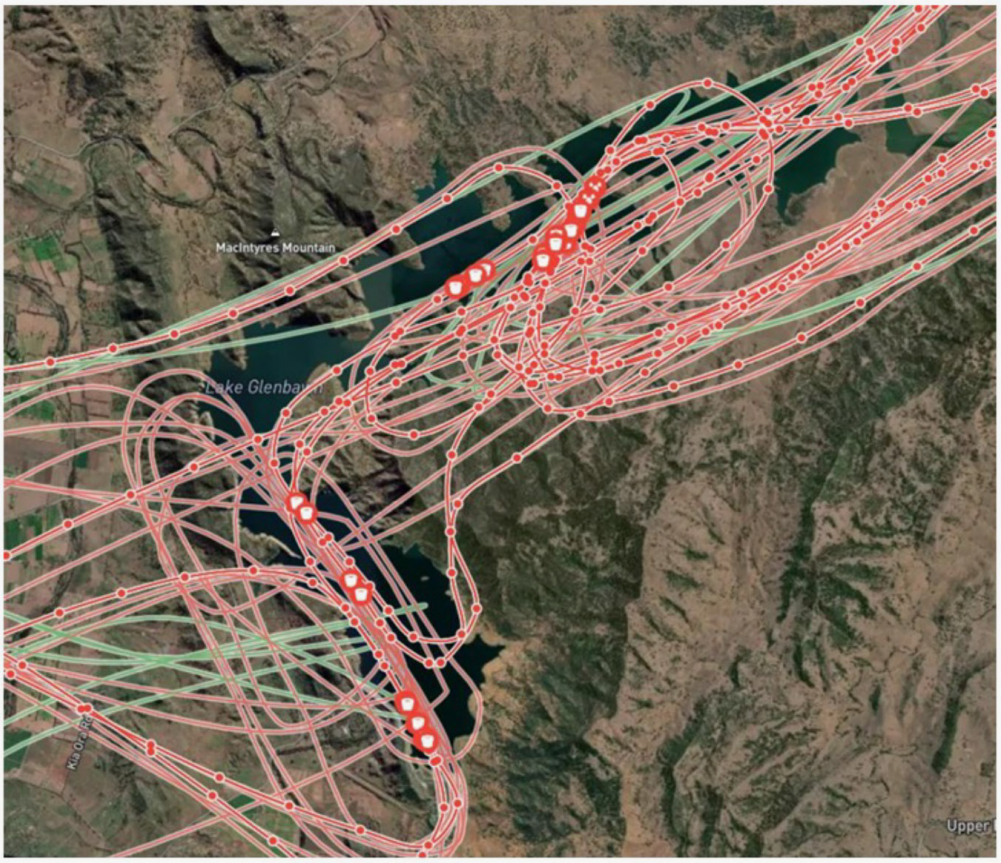

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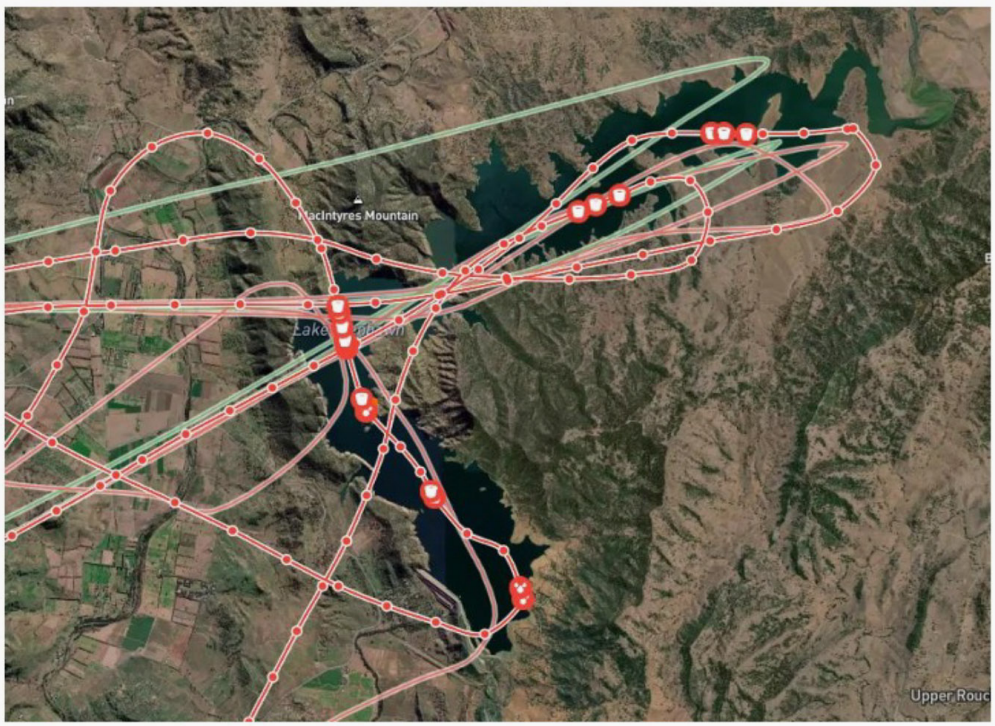

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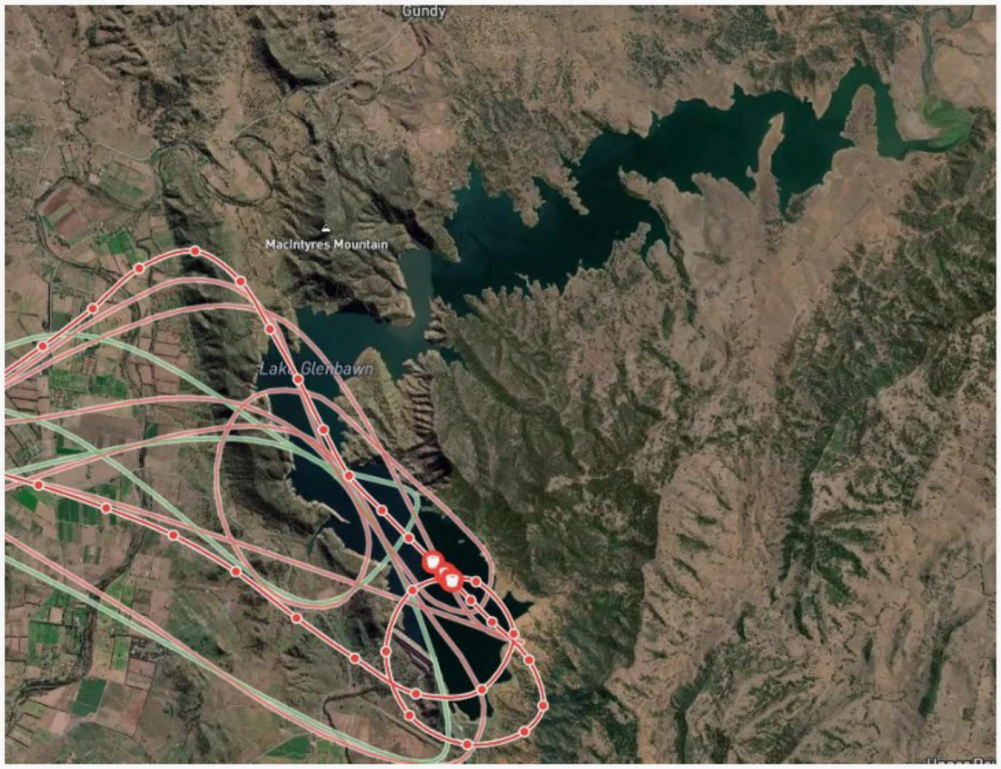

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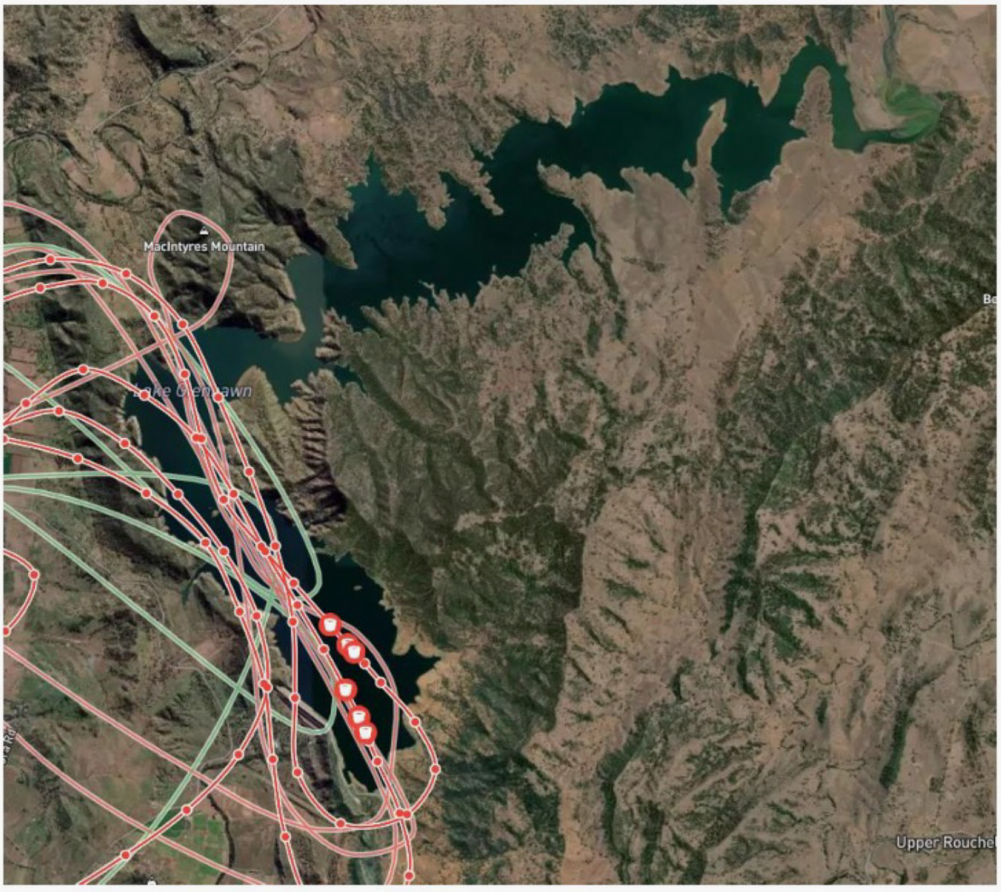


Mr McKillop also explains why another dam cannot simply be assumed to provide an equivalent alternative. During the Hunter Road bushfire, wind and operational constraints prevented Chaffey Dam from substituting for Glenbawn despite being geographically closer.

In his submission on the earlier study corridor, Mr McKillop warned that transmission lines crossing any part of Lake Glenbawn, or within four nautical miles of a scooping approach zone, would create a serious incident risk. EnergyCo must demonstrate how the current alignment addresses that expert warning under realistic water levels and operating conditions.

The consequences extend beyond aircraft safety. If pilots must abandon a scooping area, restrict their operations or use a more distant water source, the community may lose firefighting capacity during an emergency. Those consequences must be assessed before the route is accepted.

> POSITION SOUGHT

The current assessment does not adequately demonstrate that safe and effective aerial firefighting can continue throughout foreseeable drought and dam drawdown conditions. DPHI must require EnergyCo to:

1. Publish revised flight-path and water-scooping assessments across a realistic range of storage levels, including historically experienced drought levels, using verified water elevations and corresponding shorelines.
2. Recalculate aircraft clearance, touchdown locations, usable scooping distances, departure paths and turning requirements at those levels, including the performance of aircraft carrying firefighting water loads.
3. Demonstrate whether the eastern scooping area remains usable and assess the consequences of any restrictions, including whether alternative parts of the lake or other water sources can provide equivalent firefighting capacity.
4. Obtain independent review by suitably qualified aviation specialists, with direct involvement from experienced local aerial firefighting operators and the NSW RFS, and publish a substantive response to their concerns.
5. Resolve these matters before determination. Where safe and effective firefighting cannot be demonstrated, change the transmission alignment.

The community should not be asked to accept reduced firefighting protection because the EIS authors assessed a full dam and failed to demonstrate that their conclusions withstand drought. Future management plans cannot repair an inadequate assessment of whether the transmission lines can safely occupy this location.

Bushfire Risk

Part B | Electricity Security

EXECUTIVE SUMMARY

EnergyCo has not quantified the bushfire risk to the transmission line it proposes, or what that risk means for electricity supply. Technical Report 12 (TR12) treats bushfire mainly as a question of ignition and public safety. On the risk to the line itself, it relies on the record of other 500 kV lines in NSW and concludes the risk is "tolerably low". TR12 maps the route's vegetation, terrain and fire history and models indicative fire behaviour, but it does not turn that work into operating consequences: how often and for how long circuits would be lost or constrained, how much generation would be curtailed, and whether supply would stay secure. It is also a desktop study: fuel loads are standard RFS values, and no bushfire-specific field sampling of fuel loads is disclosed in the highest-risk section.

The objection we present is that the project would concentrate the output of an entire REZ, up to 6 GW, in a single shared easement, carrying two parallel double-circuit 500 kV lines, through the most fire-prone country on the route, and that EnergyCo has not tested what happens when that country burns.

It has burnt before. TR12 itself records that the 2019/20 Pages Creek Road fire and the 2002/03 Gulf Gogs complex directly impacted parts of the proposed easement. NPWS fire records show the Pearsons Trail complex burnt from 11 December 2019 to 22 January 2020, and the Pages Creek Road fire from 12 December 2019 to 11 January 2020. The recorded event windows overlapped for about a month, and the final footprints of both fires intersect the published EIS project area. The first-hand account of the Pearsons Trail fire in this submission describes what a fire of that length does to that country.

The central question the EIS does not answer is this: what happens to the line, and to the National Electricity Market, when a fire burns along this corridor for weeks? Specifically:

Derating. How long would AEMO constrain flows on the line, and how much REZ generation would be stranded?

De-energisation. Would the line be switched off for aerial retardant drops or ground crews working the easement, and for how long?

Priority. When firefighting and energy security conflict, which wins, who decides, and under what protocol?

Repair. Can damage be repaired while the fire is still burning in steep, inaccessible country?

Energy security. What would replace the curtailed output, tested across different output levels, fire conditions and outage durations, up to transfers approaching 6 GW?

The Department should not accept TR12 as adequate. A measured, route-specific assessment of bushfire risk to supply, with input from AEMO, the network operator and the NSW RFS, is needed before the project can be determined.

Appendix C in is a first-hand account by Mark Grady, a member of the Niangala Brigade of the NSW Rural Fire Service, of fighting the Pearson Trail Complex fire from 19 to 31 December 2019 along Forest Way, near Hams Corner and Nundle State Forest. This is the section where the proposed lines would run along the top of the Great Dividing Range before turning south towards Barry, and which TR12 itself identifies as the most likely to suffer a significant bushfire. The account records that the fire jumped Forest Way on 28 December and that by 29 December "the entire path of the proposed powerlines was engulfed by fire and out of control".

The account is significant because it shows, on the proposed route itself, the conditions TR12 has not assessed. The fire burnt for weeks in rugged, largely inaccessible country. It was held back by night backburning, bulldozers and helicopters working close to the line of the route, the kind of operations that would raise questions about de-energisation and reclassification if 500 kV lines were present. Access was dangerous: burning trees threatened the roads crews used, and two bulldozer operators were overrun about 20 km from any clearing. Repair crews would face the same conditions. The diarist's view is that, had the lines been there, they would have been destroyed. EnergyCo has not tested whether he is right.

It is also real evidence from the ground, which TR12 does not have. TR12 is a desktop study built on standard fuel tables, mapped fire extents and the record of lines elsewhere. The account shows what those sources cannot: how this fire actually behaved in this country, and how little control anyone had over it. The fire was held for days, then climbed to the top of the range, jumped the road and ran east. Crews were told they had all day to finish a containment line, and within an hour the fire was minutes from overrunning them. Wildfire in this terrain does not follow a plan or a model. An assessment that assumes fires near the lines will be brief, predictable and controllable is not an assessment of this route.

1 | Why bushfire is a supply security issue for this project

The project is not a local line. EIS Technical Report 12 (TR12) states it would provide 2.4 GW of transfer capacity in Stage 1 (2032) and a further 3.6 GW in Stage 2 (2034), a total of 6 GW. The principal export route for that output is the bulk corridor, which the main EIS describes as about 190 km from Central South Hub to Bayswater, with further 500 kV connections between the hubs. (TR12's figure of about 240 km covers all of the dual 500 kV infrastructure between the central hubs and Bayswater, and should not be confused with the bulk corridor.) The proposed bulk corridor places two parallel double-circuit 500 kV lines, four circuits on two tower lines, within a shared easement, typically 140 m wide (EIS Figure 3.3). EnergyCo should demonstrate the consequences of a bushfire affecting one circuit, both circuits on one tower line, or circuits on both parallel lines, and how much capacity would remain through other connections, including the Central Hub B connection to the existing 330 kV network.

That design means the REZ's export is only as secure as the most exposed section of the corridor. TR12 identifies that section itself. It says the highest likelihood of a significant bushfire impacting the easement is between the Barnard River and the south-western edge of the New England Tableland, and that the line descends there from about 1,300 m in Nundle State Forest to about 600 m at the Barnard River. That is a long, steep, forested uphill fire run, which is exactly the setting TR12 says caused transmission damage in 2019-20.

At the southern end, the line terminates at Bayswater, beside Liddell, where existing 330 kV lines out of Liddell tripped in January 2020 after bushfire pollution built up on their insulators (see below).

The SEARs required an assessment of bushfire risk to public safety. TR12 has largely confined itself to that. But a 6 GW connection must also be assessed for what happens to supply when fire comes through. A failure here does not just affect the landholders along the route. It affects every electricity consumer in NSW.

These are not matters to be left to AEMO and the eventual network operator after approval. They are foreseeable consequences of the proposed route and shared-easement design. They affect whether the project can deliver its stated electricity-security benefits, whether firefighting operations would be restricted, and whether a less exposed alignment is required. They must therefore inform the assessment of the project and its alternatives before approval, with AEMO and the network operator providing the necessary technical input.

2 | How TR12 assessed the risk: a desktop study

TR12 is a desktop assessment. It states that, apart from fuel surveys at Moonbi, Limbri and Chaffey, no project-specific field survey was carried out, because publicly available data was "deemed adequate". Fuel loads were taken from the NSW RFS standard values in its 2019 *Comprehensive vegetation fuel loads* fact sheet, and no field sampling of fuel loads was undertaken.

TR12 discloses no bushfire-specific field sampling of fuel loads in the section it says carries the highest likelihood of a significant bushfire: the steep, forested and plantation country from Nundle State Forest down to the Barnard River, and on through Ben Halls Gap and Pages Creek. TR12 itself describes that country as "conducive to supporting large bushfires", with a history of "large recurrent fire events" and "a high likelihood of supporting bushfires in the future". The highest-risk section of a 6 GW corridor has been assessed from standard tables and a comparison with lines elsewhere.

TR12 concludes that its Section 8 measures "will serve to maintain bushfire risk to the project" at levels "as low as reasonably practicable". Those measures are largely compliance with existing standards and plans. ALARP is asserted, not demonstrated: there is no estimate of the residual risk to supply, and nothing to show what further measures were considered and rejected.

A proper assessment of this section would include, at a minimum:

- field sampling of fuel loads and structure in the native forest and pine plantation the corridor crosses
- vegetation height and canopy surveys (for example LiDAR) under the proposed spans, with conductor clearance profiles
- verification of slope and aspect along the alignment against TR12's own damage criterion
- a reconstruction of how the 2019-20 Pearson Trail Complex and Pages Creek Road fires actually progressed, from RFS, NPWS and Forestry Corporation records, severity mapping and landholder accounts
- direct input from the local brigades and Forestry Corporation crews who fought those fires

3 | The fire history in the EIS is incomplete

TR12 does not present a full fire history of the corridor, and it should be required to. Its history is drawn from mapped fire extents and focuses on area burnt. It acknowledges that the Pearson Trail Complex burnt for about six weeks, but it does not reconstruct how that fire, or any other, progressed along the proposed alignment, which is what matters for a transmission line. It also gives little regional context: the 2019-20

season brought major fires around the Walcha district, including the Stockyard Flat fire that destroyed homes at Yarrowitch, after record drought and fire weather.

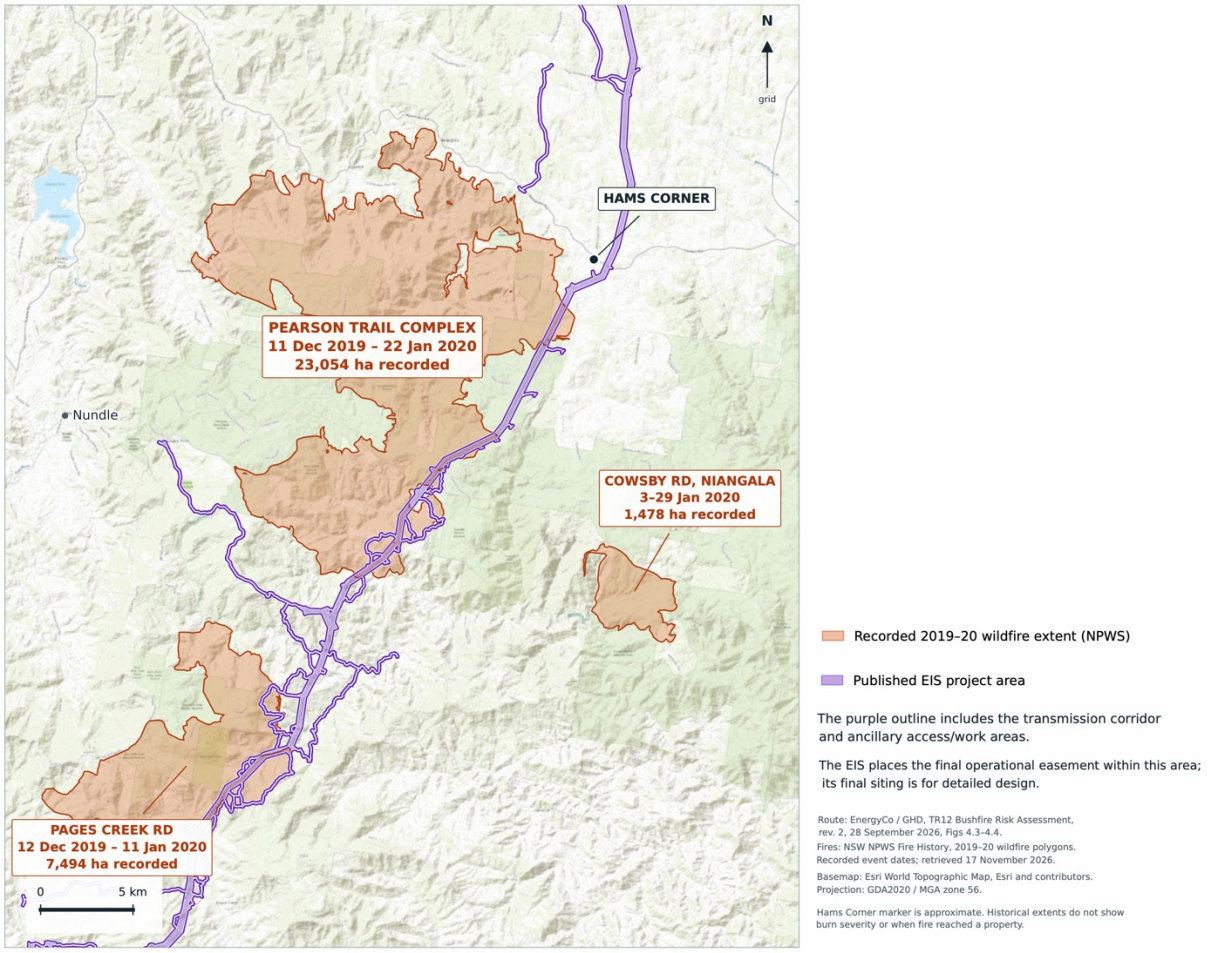
Even so, TR12 concedes the key facts. The Pages Creek Road fire (2019/20) and the Gulf Gogs complex (2002/03) both directly impacted the proposed easement. The Pearsons Trail complex (2019/20) burnt for about six weeks across the steep forest and pine country between Nundle and the Barnard River. TR12 also accepts that large fires in this corridor overwhelmingly occur in drought years, which the Tablelands will see several of over the life of a transmission line.

NPWS fire history records, overlaid on the published EIS project area, show how the 2019-20 fires sat against the corridor:

Fire (2019-20)	Recorded dates (NPWS)	Duration	Area	Relation to project area
Pearson Trail Complex	11 Dec 2019 to 22 Jan 2020	about 6 weeks	23,054 ha	Overlaps the project area south-west of Hams Corner, down through Nundle State Forest
Pages Creek Road	12 Dec 2019 to 11 Jan 2020	about 4 weeks	7,494 ha	Overlaps the project area at the southern end of the section
Cowsby Road, Niangala	3 to 29 Jan 2020	about 4 weeks	1,478 ha	East of the project area

2019-20 fires and the proposed transmission route

Hams Corner, Niangala and south to Pages Creek



The project area includes access and work areas as well as the corridor, and the final easement is to be sited within it at detailed design. The recorded event windows of the Pearson Trail Complex and Pages Creek Road fires overlapped for about a month, and both final footprints intersect the project area. A reconstruction of fire progression is needed to establish when particular sections of the alignment would have been threatened.

The first-hand account of the Pearsons Trail fire in this submission describes what a six-week fire in the section TR12 itself identifies as highest risk looked like in practice. TR12 should be revised to include a complete fire history for the route, including how fires progressed along the alignment, and that history should be used to test how the line would operate through fires of that kind.

4 | The risk to the lines has been assumed, not measured

TR12's case that the line is safe from bushfire is an argument by analogy. It says 500 kV lines have operated in NSW for more than 43 years, that they suffered negligible damage in 2002/03 and 2019/20, and that serious damage in 2019/20 was confined to 330 kV lines in the Snowy Mountains, where the terrain is worse than here. From that it concludes the risk to this project is "tolerably low". It maps hazards along the route and models indicative fire behaviour, but it never translates that into what fire would mean for the operation of these lines.

The analogy does not hold up, for five reasons.

1. **Ignition history is not exposure.** Much of TR12's reassurance is that 500 kV lines do not start fires. That is a different question from whether fires stop them working.

2. **Existing 500 kV lines did go out.** TR12 records 11 transient outages on three 500 kV lines in 2019-20, and concedes it is "not practically feasible to fully eliminate" such outages and that this line "may experience outage events episodically". It never estimates how often, for how long, or at what cost to supply. Six of those eleven outages were on the Eraring to Kemps Creek line, the same line TR12 holds up as its example of continuous operation through fire weather. NPWS records show that line was crossed by four fires in 2019-20, including Gospers Mountain and Three Mile, and by large fires in 1993-94, 1997-98, 2001-02 and 2002-03. Its record shows that a line in a meshed network close to Sydney can ride through repeated fires with transient outages. It says nothing about a corridor carrying the export of an entire REZ.

3. **TR12 states the damage criterion, then does not apply it.** It says 2019-20 damage occurred where lines crossed forest at or near the top of long, steep slopes facing north-west to south-west, where westerly winds drove crown fires uphill. It says the greatest risk on this project is in line sections matching that description. It maps slope and aspect (Figures 4.13 to 4.18) and vegetation separately, but does not bring them together to show which towers and spans fall in those conditions, or what the modelled fire behaviour and conductor clearance is at each. Its terrain legends also refer to north-to-west aspects, while the text identifies north-west to south-west; EnergyCo should explain whether the mapping captures the exposure it describes. The descent from about 1,300 m in Nundle State Forest to about 600 m at the Barnard River is the obvious place to start.

4. **TR12 has not shown the lines it cites are comparable in role.** The existing lines TR12 cites are part of a meshed network built around the coal stations. The bulk corridor would be the principal export path for an entire REZ. TR12 has not shown that the lines it cites are comparable in network role, alternative export paths or exposure to simultaneous circuit loss. TR12 concludes the project's

bushfire risk is "substantially similar" to that of the Eraring to Kemps Creek and Bannaby to Mount Piper 500 kV lines, but each of those is a single double-circuit tower line. Neither is two parallel double-circuit lines in one shared easement, as proposed here. A fire across the shared easement, affecting circuits on both parallel lines, could take most or all of the REZ's output with it. The EIS identifies a connection from Central Hub B to the existing 330 kV network, but does not show how much generation it could carry if the bulk corridor were constrained or lost.

5. **Outages do not need flame contact.** On 7 January 2020 the Liddell to Muswellbrook and Liddell to Tamworth 330 kV lines tripped on bushfire pollution on their insulators after three dry months, separating NSW from Queensland. That happened on lines out of Liddell, beside Bayswater where this project would terminate. TR12 recognises flame and smoke-plume interruptions, but not bushfire contamination building up on insulators and later flashing over.

TR12's comfort also rests on 500 kV towers rarely being damaged. That has been true of bushfire in NSW so far, but parallel 500 kV lines in one corridor have been lost together in Australia. On 13 February 2024 a storm brought down six towers near Anakie in Victoria and both Moorabool to Sydenham 500 kV lines tripped. Victoria lost about 2,900 MW of generation. Even on accessible farmland, temporary towers did not return the first line to service until 25 February and the second until 6 March. It shows what a common-mode loss of a shared 500 kV corridor looks like, and how long restoration takes.

Fire is not the only event that could take out both lines at once. The corridor climbs to about 1,300 m in Nundle State Forest and crosses the exposed New England Tableland, country subject to very high winds and to snow and ice in winter. Anakie was not a one-off: on 31 January 2020 high winds brought down six towers on a double-circuit 500 kV line near Cressy, also in Victoria. Wind engineers have warned that transmission towers are now failing in ways not seen before, and that the overhead line design standard, AS/NZS 7000, does not yet reflect how a line's length and orientation affect its exposure to convective downbursts.

In NSW, a severe storm on 16 October 2024 brought down seven Transgrid 220 kV towers, cutting supply to Broken Hill. Snow is a real risk on this route too. In the 2 to 3 August 2025 snowstorm, 30 to 60 cm of snow was reported at Guyra, snow and ice closed the New England Highway and the Walcha to Bendemeer road, and the weight of snow brought down trees and power lines across Walcha, Uralla and Armidale. More than 32,000 homes and businesses lost power, crews could not begin some repairs until access improved, and power was not fully restored in New England until 9 August. The event shows the snow loading and access problems the elevated sections of this corridor would face.

The EIS should state what wind, snow and ice loads the towers and conductors are designed for in each section, including downbursts at the most exposed elevations and combined ice and wind loading. It should show the consequences for supply if a single storm failed towers on both parallel lines, how long restoration would take in steep or snow-affected country, and whether the shared easement is appropriate given that one storm cell can reach both lines. If EnergyCo has modelled these events, the results should be published. If it has not, it should be required to.

A measured assessment would identify the exposed sections, model the actual fuels and slopes in each, estimate outage frequency and duration from all causes, and then state what those outages mean for the delivery of REZ generation. TR12 does not do this.

5 | Fire weather: incomplete and unrepresentative data

TR12's fire weather evidence is thin, and it is drawn from the wrong places for the highest-risk section.

Location	Baseline severe fire danger days per year (1990-2009)	Projected additional days by 2090, low / high emissions
Armidale	0.3	0.1 / 0.7
Tamworth	Not given	0.58 / 2
Muswellbrook	Not given	1.49 / 4.41
Walcha, Nundle, Northern Slopes escarpment	Not given	Not given

Only Armidale has a baseline. For Tamworth and Muswellbrook, TR12 gives the increase without the starting figure, so the reader cannot tell how many severe days those places get now or will get. Nothing is given for Walcha, Nundle or the escarpment between the Tableland and the Barnard River, where TR12 itself places the greatest risk. Armidale, on the elevated Tableland, does not represent the escarpment.

From these figures, TR12 concludes that planning values of FFDI 80 (New England and Northern Slopes) and FFDI 100 (Greater Hunter) remain valid because projected changes "will not exceed these levels". A count of severe days does not show that extreme values will stay within those limits. North-east NSW reached catastrophic fire danger on 6 September 2019. EnergyCo should provide baseline and projected severe fire danger days for each section of the route, using data representative of the escarpment, and an exceedance analysis showing how often FFDI 80 and 100 could be exceeded over the life of the asset.

6 | Derating, depowering and damage

There are three separate ways a fire stops this line delivering power. TR12 deals properly with none of them.

6.1 Derating: security constraints from bushfire risk

Under AEMO's Power System Security Guidelines (SO_OP_3715), the loss of both circuits of a double circuit line is normally treated as non-credible. During a bushfire, the network operator scores the threat, and if the total reaches 13 or more, AEMO considers reclassifying the simultaneous loss of both circuits as credible. AEMO then constrains dispatch and flows so the system stays secure if both circuits are lost. In the bulk corridor, two double-circuit lines would share one easement. The guidelines direct the assessment to the double circuit most exposed to the fire front, and allow AEMO to reclassify the loss of multiple circuits on the network operator's advice. A fire front crossing the shared easement puts all four circuits in play, and the transfer limit then depends on how many of them AEMO must assume could be lost together.

As an illustration only, using assumed conditions for a fire in the Nundle to Barnard River section, the scores could add up as follows:

Factor (SO_OP_3715 Appendix A)	Score	Nundle State Forest to Barnard River
Fire danger: Catastrophic	6	North-east NSW hit catastrophic FFDI on 6 Sept 2019
Easement fuel: plantation	4 (highest category)	Pine plantation in Nundle State Forest
Fire expected to reach easement within an hour	5	Steep uphill runs; TR12 models up to 7.6 km/h in forest
Fire service confirms a threat to the easement	3	Standard on an active incident
Double circuit on single towers	2 (highest category)	Both parallel lines are double circuit
Total	20	Threshold is 13 (subtotal before operator-action adjustment of -2 to +3)

Even on an "Extreme" rather than "Catastrophic" day, the same fire scores 17. Even with the most favourable operator adjustment (-2), the totals would be 18 and 15, still above 13. The guidelines also say that confirmed aerial retardant spraying on or over the circuits triggers reclassification.

So on serious fire days in that forest, AEMO could restrict how much of the REZ's output can flow, possibly on many days while a fire like the Pearson Trail Complex burns for six weeks. On 4 January 2020, after the separation, AEMO constrained Wagga area generation to zero for security. If the same were done here, the stranded generation could be measured in gigawatts, on a hot, high-demand day, when NSW is most likely to be short of supply.

TR12 acknowledges that control rooms can re-classify lines to "adjust operating limits or electricity flows". Those restrictions can require generation curtailment. It does not apply AEMO's bushfire criteria to the project, or estimate the resulting transfer limits, how long they would last, or how much generation would be curtailed.

Heat is a separate issue. A line's thermal rating falls as ambient temperature rises, and fire weather often comes with extreme heat. The EIS should state the line's rating at the temperatures expected under fire conditions, and how often its full 6 GW could not be delivered.

6.2 Depowering: de-energisation, smoke and flashover

TR12 calls de-energisation at the request of the Rural Fire Service an "unlikely event". It gives no data. It also concedes that fires can cause power interruptions through flame or ionised smoke columns reaching the conductors, and that it is "not practically feasible to fully eliminate" such outages.

NPWS told EnergyCo that firefighters working under high voltage lines is a real risk and that it needs to be assessed. TR12's answer is largely qualitative: the RFS has doctrine for working near powerlines. The EIS should identify which ground and aerial operations would require de-energisation, which could proceed under other controls, how many circuits would be affected, and the resulting loss of transfer capacity.

TR12 recognises flame and smoke-plume interruptions, but not bushfire contamination building up on insulators and later flashing over, as happened to Lines 83 and 84 out of Liddell in January 2020. A connection terminating at Bayswater faces the same exposure.

6.3 Damage, and how long it takes to fix

TR12 says towers are non-combustible and need no defence. That is not the question. The question is what happens when conductors are annealed, insulators damaged or a tower lost in country where crews cannot get in.

TR12's own modelling gives flame lengths of 40 to 50 m in dry forest and 53 m in wet forest on slopes over 15 degrees, against a 10 m vertical clearance above retained canopy. Flame length is not the same as height above the canopy, but with spans averaging 450 m and longer in places, and conductors sagging mid-span, the EIS should show, span by span through the steep forest, how modelled fire behaviour, retained vegetation, sag and clearances have been assessed together.

7 | A fire that burns on the corridor for weeks

The EIS must be required to test the line against the kind of fire this corridor has already had. In 2019-20 the Pearsons Trail complex burnt for about six weeks (11 December 2019 to 22 January 2020) and the Pages Creek Road fire for about four weeks (12 December 2019 to 11 January 2020), with event windows overlapping for about a month and both final footprints intersecting the published project area. The Pearsons Trail fire burnt in the very section TR12 identifies as most likely to suffer a significant bushfire, through pine plantation for which TR12 discloses no separate fuel scenario, and the first-hand account in this submission describes its course. Fires in this country are not single-day events. They burn in steep, inaccessible terrain, are contained and break out again with each run of bad weather, and are often only put out by rain. Each question below follows from that, and none is answered in the EIS.

7.1 Will the lines be derated for the whole fire?

Under AEMO's guidelines, a bushfire reclassification is cancelled only when the network operator advises that the fire is no longer a threat to the line: the front has passed, winds have eased, or the fire is out. A fire burning beside the easement in inaccessible country for six weeks can become a threat again on each hot, windy day in that period. The EIS should state how many days the line would be expected to run under reclassification constraints during such a fire, at what transfer limit, and how much REZ generation would be curtailed.

7.2 Will they be de-energised for aerial attack and ground crews?

In steep forest, aerial attack is often the only practical attack. AEMO's guidelines treat confirmed retardant spraying on or over the circuits as grounds for reclassification. TR12 says retardant drops are kept at least 25 m from lines and towers. NPWS told EnergyCo that low-level aerial work is often under 300 feet, and that the risk to firefighters under high voltage lines needs to be assessed. If aircraft or crews need to work the easement itself, or use it as a containment line or backburning edge, some or all circuits may have to be switched off. The EIS does not say which operations would require that, how often, how many circuits, or for how long.

TR12 identifies both involuntary outages caused by bushfire and deliberate de-energisation to permit firefighting, but does not quantify either for this route. Describing firefighting shutdowns as unlikely does not establish how often they may be required, which circuits would be affected or how long restrictions would last. The EIS must also explain which aerial operations remain practicable with the lines energised, what restrictions apply to water and retardant drops, and when de-energisation or network reclassification would

be required. TR12 also credits a "highly successful firefighting campaign" with minimising pine plantation losses around Nundle in the 2019-20 Pearson Trail Complex fire, but does not consider whether that campaign could be fought the same way with two 500 kV lines through the plantation.

7.3 Which comes first: firefighting or energy security?

TR12 sets out a process: the RFS, as lead agency, directs the network operator and AEMO, the outage is verified and confirmed back to the RFS, and the Incident Controller then decides on firefighting activity. It describes de-energisation as an "unlikely event". It does not address what happens when the two priorities conflict, which is precisely when it matters: a hot, high-demand day, with NSW short of reserves and the fire running.

The 4 January 2020 event shows how hard those decisions are. AEMO's final report records that AEMO judged it not reasonable to constrain Victoria to NSW transfers that day because NSW reserves were already low, and that the system was then not secure for about 13 minutes between line trips. If the RFS asks for this line to be switched off on such a day, will the request be met immediately, or weighed against the loss of up to 6 GW? It may be possible to maintain supply through other generation, other network paths or partial shutdowns, but the EIS has not shown how. It should show how an urgent firefighting shutdown in Nundle State Forest or below Ben Halls Gap would be carried out promptly, who decides, and what the supply consequences would be under high-demand, low-reserve conditions.

7.4 Can they be derated or switched off without affecting energy security?

Only if something else can supply what the REZ is meant to supply. The EIS does not identify what generation or network capacity would replace up to 6 GW during a weeks-long fire, or whether it would exist by the 2030s when the line is due to be energised. AEMO's 4 January 2020 report records about 2,267 MW of generation availability lost that day, a Lack of Reserve 2 declared in NSW, and emergency reserves activated. The bulk corridor alone could carry more than twice that. AEMO should be asked to assess the effect of losing or constraining one or both lines for an extended period, and the EIS should publish that assessment.

7.5 Can damage be repaired while the fire is still burning?

TR12 says construction crews in this country may need more than 30 minutes to evacuate, some on unsealed roads. Repair crews will face the same terrain, plus fallen and burning trees. In northern NSW in November 2019, Transgrid could not reach structures on its 132 kV Armidale to Koolkhan line because of active fires, and took about nine days to return it to service. Damage to one or both of the 500 kV lines in Nundle State Forest early in a six-week fire may not be reachable for some time. After the 2024 Anakie collapse, on accessible farmland with no fire, restoring the two parallel 500 kV lines on temporary towers took 12 and 22 days. The EIS should set out restoration scenarios for each circuit that allow for periods when active fire prevents safe access, followed by inspection and repair.

8 | Specific deficiencies in Technical Report 12

1. **No supply security assessment.** TR12 maps hazards and models indicative fire behaviour, but does not quantify how often or how long circuits would be lost or constrained, how much transfer capacity would remain, how much generation would be curtailed, or whether supply would stay secure. Section 6.2.6 on outage potential is about a page.
2. **Risk assumed from other lines.** The conclusion that risk to the lines is "tolerably low" rests on the record of other 500 kV lines, not a quantified assessment of this route. Fuel loads are RFS standard values, no field sampling was done, and no bushfire-specific field sampling of fuel loads is disclosed in the highest-risk section. TR12 states the conditions that caused transmission damage in 2019-20 but does not identify which towers and spans meet them.
3. **No prolonged fire scenario.** TR12 acknowledges the six-week Pearson Trail Complex but does not reconstruct its progression against the alignment, or assess how an equivalent fire would affect circuit availability, operating restrictions and restoration.
4. **Reclassification not applied; insulator contamination not assessed.** TR12 acknowledges reclassification but does not apply AEMO's bushfire criteria to defined scenarios or quantify the resulting restrictions. It does not assess contamination building up on insulators and flashing over.
5. **No plantation fuel scenario.** Section 4.1 says pine plantation fuels would drive fire behaviour where plantations are established, but no separate plantation scenario is disclosed in the modelling tables. EnergyCo should explain how plantation age, structure, fuel loads and management were represented.
6. **Fire weather.** TR12 asserts that climate change will not exceed FFDI 80 and 100, relying on projected numbers of severe fire weather days. That does not show those values represent future extremes. Exceedance analysis and sensitivity testing are needed.
7. **Modelling inputs to be checked.** Page 39 pairs FFDI 80 with GFDI 110, but the grassland note in Table 4.4 refers to GFDI 130. The shrubland and grassland results in Table 4.4 are identical to those in the FFDI 100 table. EnergyCo should explain the inputs and confirm the calculations.
8. **Overstated certainty.** The conclusion says diligent construction controls "can entirely prevent bushfire ignition". EnergyCo should explain how implementation failures and residual risk are treated. ALARP is asserted for the Section 8 measures with no estimate of residual risk to supply.
9. **Consultation detail.** TR12 records consultation with only "some local representatives" of volunteer brigades. It should list the brigades consulted, their advice, unresolved concerns, and how Nundle and Barnard River scenarios address them.
10. **Firefighting shutdowns not quantified.** NPWS raised the risk to firefighters under high voltage lines. TR12's treatment is qualitative, with no shutdown times or circuit availability consequences.

9 | Requests to the Department

1. Find that TR12 does not adequately assess bushfire risk to the project, and that the EIS has not assessed the consequences of bushfire for electricity supply security.
2. Require a route-specific risk assessment that identifies every line section matching TR12's own damage criterion (forest at or near the top of long, steep slopes facing north-west to south-west), with fire behaviour modelled for the actual fuels in each, including pine plantation, and span-by-span conductor clearance checks, supported by field sampling of fuels and vegetation surveys in the Nundle to Barnard River and Pages Creek sections, and fire weather data representative of the escarpment with an exceedance analysis for FFDI 80 and 100.
3. Require a prolonged fire scenario for the Nundle to Barnard River and Pages Creek sections, based on the 2019/20 Pearsons Trail and Pages Creek Road fires, setting out expected days under reclassification constraints, de-energisation for firefighting, repair access and restoration times, and the volume of REZ generation curtailed.
4. Require EnergyCo to obtain and publish written advice from AEMO and the network operator on how the line would be operated during such a fire, and from the NSW RFS on when it would request de-energisation and how conflicts between firefighting and supply would be resolved.
5. Require AEMO's assessment, for each credible bushfire scenario, of the transfer capacity remaining through unaffected circuits and other connections, including the Central Hub B connection to the 330 kV network, the generation curtailed, and whether supply would remain secure, including a stress test with transfers approaching 6 GW.
6. Require a complete fire history of the corridor, including how fires progressed along the alignment, informed by local brigades and landholders.
7. Require EnergyCo to justify concentrating up to 6 GW in one shared corridor through this country, to demonstrate the consequences of a bushfire affecting one circuit, both circuits on one tower line, or circuits on both parallel lines, and to assess route or circuit alternatives that avoid the Nundle State Forest and Barnard River escarpment. The same assessment should cover severe wind, including convective downbursts, and snow and ice loading on the elevated sections.
8. Require an assessment of the risk to firefighters working under or near the line, as NPWS requested.
9. Not determine the project until these matters have been assessed and exhibited for comment.

Sources

GHD for EnergyCo, *New England REZ Network Infrastructure Project, Technical Report 12: Bushfire Risk Assessment*, Rev 2, 28 September 2026 (EIS, SSI-74175972). Sections 1.2, 3.4, 4.1 to 4.8, 5.2, 6.2, 6.3, 9.

AEMO, Power System Security Guidelines SO_OP_3715, Appendix A bushfire reclassification criteria

AEMO, Final Report: NSW and Victoria Separation Event on 4 January 2020, September 2020

Transgrid, Overview of 2019-20 Bushfire Damage to TransGrid's Network, AER cost pass through application, November 2020

NSW Government, Annual Air Quality Statement 2019: Bushfires

NBN News, North West fire update: Stockyard Flat fire, Yarrowitch

Energy Networks Australia, Towers down but the transmission grid powers on (Anakie, 13 February 2024)

WattClarity, How severe thunderstorms impact energy infrastructure (Moorabool to Sydenham return to service dates)

Energy Safe Victoria, Cressy 500 kV Tower Incident, 31 January 2020: incident report

create digital (Engineers Australia), Transmission tower failures on the increase

IPART, Investigation Terms of Reference: Broken Hill tower failures and power outages, October 2024

Essential Energy, Staying prepared and strengthening the network for storms ahead, 11 August 2025

New England Times, Evacuations in Gunnedah as flooding worsens, others plan to be without power for days, 3 August 2025

New England Times, Communities recover from the Winter Wonderland that became a Winter Nightmare, 12 August 2025

Maps: NSW NPWS Fire History, 2019-20 and earlier wildfire polygons (retrieved 17 November 2026), overlaid on the EIS project area from TR12 Figures 4.3 to 4.5. Fire overlap shows where recorded fires burnt; it does not establish damage, fault locations or burn severity.

Appendices

Appendix A
Submission from Harley McKillop - Pilot

My name is Harley Mckillop. I hold the following expert qualifications that enable me to

provide feedback, from an Aerial firefighting and safety perspective, to the New Study Corridor released by EnergyCo on 2 October 2025:

- I have been a pilot for 45 years and for the past 35 years I have been flying extensively in the low level environment.
- I have flown aircraft on firefighting deployments across most states in Australia and Europe.
- I was the chief pilot of Pays Air Service, a global aerial firefighting company, for 18 years, mainly based out of Scone NSW.
- I am one of 6 independent Civil Aviation Safety Authority (CASA) approved aerial
- firefighting instructors in Australia and I hold an Examiner of airmen rating for CASA.
- I now own and operate a Low Level flying school which in based out of Scone NSW, where I train and examine pilots for the issue of Aerial application ratings, Low Level ratings, firefighting ratings, as well as design feature endorsements.

Part of what I also do is contract my services to various operators to fly the FireBoss amphibious scooping aircraft for firefighting. This aircraft requires a great deal of concentration to operate. In some cases, we are picking up a load from a waterway every 5 minutes, and we will do this for 3 hours before requiring fuel. The work is nearly always carried out in extreme temperatures and strong winds, the concentration required to scoop and drop on the fire for a 3 hour stretch is immense. The day is very fatiguing with no room for error.

I refer to the written feedback submissions from Nat Nagy, Chief Operating Officer at Pay's Air Service, in respect of EnergyCo's New Study Corridor. I fully concur and agree with Mr Nagy's feedback submissions. I refer to the Attachments to Mr Nagy's feedback submission (which are attached again below to this feedback). I note that I was the pilot flying the FireBoss amphibious scooping aircraft VH-AP8 for the period 1st to 9th December 2025, and this is in fact my flight data for flight tracks and scooping zones in and around Lake Glenbawn whilst I have been fighting fires these past 10 days. I note that this data only represents my flight data for the aircraft I was flying during this period, and that there were 5 other firefighting aircraft flying with me as a team during this period.

As the maps show, I have been working extensively out of Lake Glenbawn over the last 10 days to fight numerous different bushfires in the region, using every stretch of the Lake and its surrounds to approach, scoop, and depart. In particular, I, together with a team of 6 other Fireboss aircraft, have been fighting the bushfire known as the 'Hunter Road Bushfire', located at Glenrock, to the north-east of Lake Glenbawn. The flight data maps clearly show that we were required to extensively utilise the far eastern end of Lake Glenbawn for approaches, scooping and departures, to fight this fire, and that the New Study Corridor would have completely prevented our firefighting operations.

Lake Glenbawn is unique in its shape and size, making it one of the few water bodies in the Upper Hunter Region that aerial firefighters can use to scoop water in any wind direction, as most of our scooping requires a headwind. The size and scale of the Lake also means that, unlike other smaller water bodies in the regions, we are able to have multiple aircraft operating and scooping out of the Lake at once – which obviously increases significantly our firefighting capabilities.

In fact, the Chaffey Dam water source was slightly closer to the Hunter Road Bushfire, so geographically it would have made sense to scoop from Chaffey Dam to fight this fire.

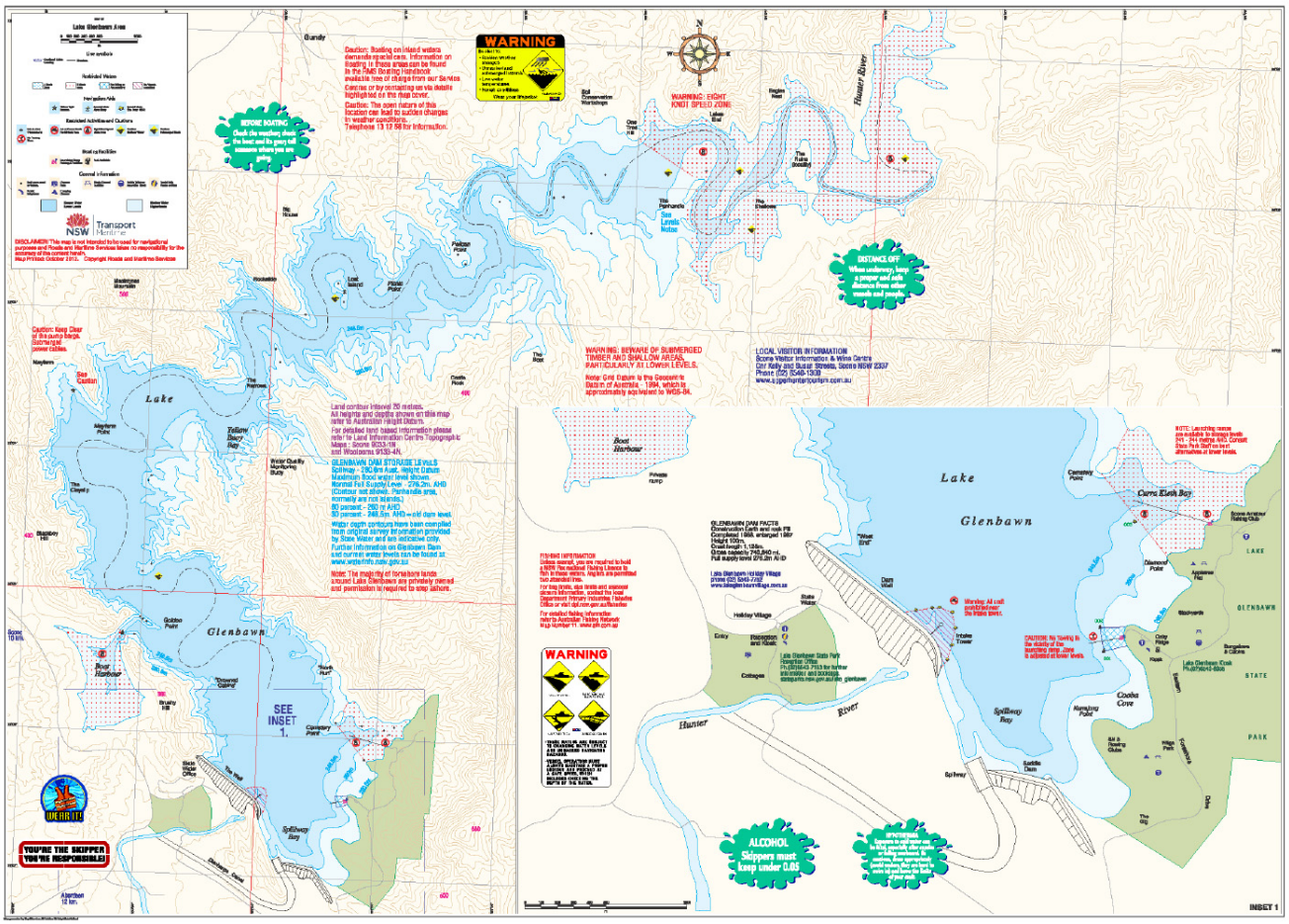
However, we were unable to scoop from the Chaffey Dam as it is a smaller water source than Lake Glenbawn, which requires the wind to be in a specific direction to scoop, which severely limits the Dam's useability. Also, the smaller size of Chaffey Dam meant that we could not operate in a team of 5 aircraft. These factors combined, meant that the only water source option available to us to scoop to aerially fight this fire was Lake Glenbawn. This scenario is consistent with many other bushfire campaigns in the Upper Hunter region. This highlights the critical import of Lake Glenbawn as a water source for aerial firefighting operations throughout the Upper Hunter.

In the circumstances, we as the pilots, and the broader public community, cannot afford to have any kind of transmission lines and structures added to the landscape in and around Lake Glenbawn that will detriment our aerial firefighting ability to save lives and assets. The nature of our work requires us to work in already very dangerous and smoky conditions, and to have EnergyCo propose dual transmission lines anywhere near Lake Glenbawn, the place of our highest workload, is not acceptable.

In my expert opinion, I believe that if EnergyCo builds the proposed transmission lines which traverses over any part of Lake Glenbawn, or within 4 nautical miles of any approach zone to Lake Glenbawn to scoop, it will only be a matter of time before a firefighting aircraft is involved in a serious incident. We require a safe workplace, and it is the duty of the NSW Government to do everything in its power to ensure a safe workplace is maintained, so that the invaluable work of the aerial firefighting for the Rural Fire Service can continue.

Appendix B

Glenbawn Dam map, showing water levels and shoreline for different capacities



> Appendix B: Map of Glenbawn Dam showing RL water heights at different Dam percentage fill levels.

Appendix C

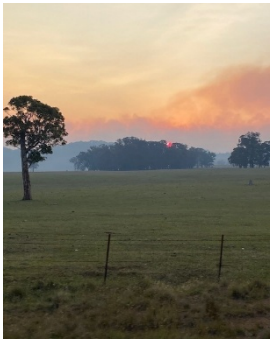
Landholder diary account of the 2019 - 20 bushfires, along Forest Way

Written by: Mark Grady - Niangala Landholder. 2656 Forest Way Niangala.
Located in close proximity to the proposed 2 x 500 New England REZ transmission line.

Diary of Christmas 2019 Fires

I note that I am a member of the Niangala Branch of the Rural Fire Service of New South Wales. The proposed power lines run along the top of the Great Dividing Range, along Forest Way, before turning south towards Barry. I have marked on the maps in yellow where the power lines are going to be.

Below is a short account of my experience in fighting the Christmas 2019 bushfires.



Thursday 19 December 2019

I worked at Tamworth during the day and travelled to our property at Forest Way to keep an eye on the fires were and the stock. The fires were getting closer and I was beginning to get worried as to what I would do with the stock and how I could best protect them. I spoke to my neighbour Aaron Ham and arranged that I would take the horses to his place if the fires got too much closer. I also got the cattle out into the open so they would stand some chance if the fire came through the property.



As I drove home, there was a smoky pall over the whole area. Below is a photograph of the landscape with the smoke on 19 December 2019, together with a map on 19 December 2019. On the map, you can see darker shaded areas where the fire was at that stage. My property is marked with an X and Y is where the Moore's property is. The proposed power lines are marked with the black line.



Friday 20 December 2019

I went to work as per normal in Tamworth that day and at the end of the day I travelled back to the farm. I rang Bruce Moore to see if he needed assistance. My two sons and I then went down to the Moore's place and assisted in backburning with property. I attach a photograph that showed where bulldozers had gone along next to the forest and cleared the land within approximately 50 metres of the road.





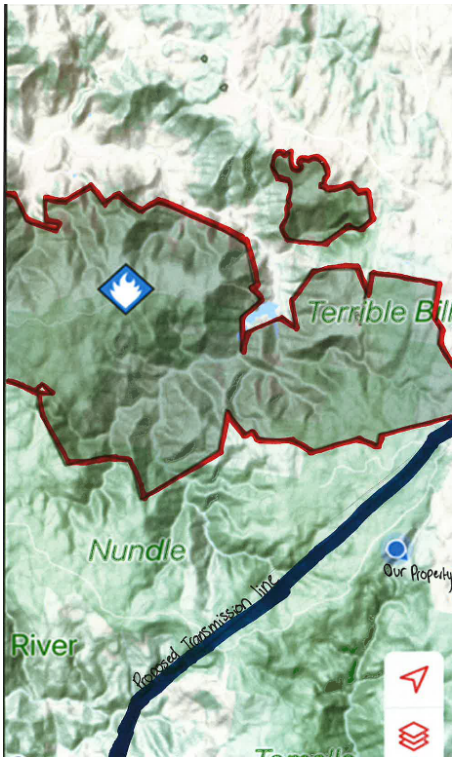
Our job was to go to the where the trees started and backburn. It would then gently burn down into the forest overnight. I note that all the work that we did was at night. We would gather at about 7:00 pm and work through the night. The following photos were all taken on Friday 20 December 2019. We were encircling the pine forest to ensure that no fire breached the road and jumped over into the pine forest. There were a couple of instances where a spark would go over the top and go into the pine forest, and our job was to quickly encircle it with bulldozer and use water, and our boots, to stamp the fire out. We backburned throughout the night and went home at about 3:00 am.





Saturday 21 December 2019

I attach herewith a map showing the spread of the fire. The blue dot is our house and to the north the fire had spread around to the east. The Niangala Brigade were looking after the fire near Ham's Corner, whereas we were looking after the area down closer to Nundle. This photograph was taken on 21 December 2019 and shows where the fires were. They were obviously burning to the east towards the top of the range and so we went back to where we were the previous day and backburned down into the forest, away from the pine forest.





A lot of heavy machinery was starting to arrive, and the weather conditions were quite good in that it was dry and not overly windy. The risk was that a spark would jump over the road and breach the firebreak and start on the other side of the line. I attach three photos that shows the area that we were trying to fight.







Sunday 22 December 2019 to Thursday 26 December 2019

During this period, the fire was under some control. There were no breakouts and where it was, was largely inaccessible. We were required to be on standby, however, at this stage, the fires were not causing an immediate risk to any property.





Friday 27 December 2019

We were called up by Bruce Moore. The fire had gone around the pine forest, but had shifted to move through the hardwood forest and up towards Forest Way, climbing towards the top of the range. These two photos on the 27 December 2019 were probably the toughest day. The fire came right up to Forest Way, and we were busy backburning and trying to control the fires and stopping them climbing the bigger trees.



We worked right through the night and there were photos on the 28 of December 2019 that show us on the back of the truck with goggles and masks on for protection. We lit fires and stamped around the bottom of the trees to try and stop them climbing the top of the tree. We worked all night and finished about 8:00 am the next morning. By this stage, the fire had come right up to Forest Way but had not crossed. There were burning trees that were at risk at falling over the road and it wasn't an easy drive home. What would normally take fifteen minutes took much longer. In any event, we arrived home safely mid-morning.

Saturday 28 December 2019

We were called at about 3:00 pm in the afternoon by Captain Bruce Moore who told us that the fire had jumped Forest Way that morning and was now travelling to the east.





This was of great concern. There were a number of houses now at risk, but very few areas to encircle the fire and get around it. We went to go to Moore's property to try to contain the fire. As the landscape was rough and largely inaccessible it was difficult work.

Sunday 29 December 2019

The fire was well and truly alight on the Moore's place. It had jumped the road in most places and there was a real scramble. Up until this day, there was only about 4 or 5 of us fighting the fires but by Sunday 29 December 2019 there were number of different brigades.



The Moore's place was crawling with people and there were a number of fire trucks and a great sense of urgency. By this stage, the entire path of the proposed powerlines was engulfed by fire and out of control.



Monday 30 December 2019

The fire was still out of control and there were at least 4 or 5 fire trucks on the Moore's place, as well as helicopters coming and going and picking up water out of dams. There were two dozers that were punching a line, one coming up from the Moore's and the other coming down from the back of Hanging Rock. They needed to travel about 15 kilometres – a long way on a bulldozer through rugged dense bushland. They both started with a full tank of fuel and were going to meet in the middle before coming out. They were told by the RFS that they had plenty of time and all day to finish the job and they were able to communicate with the whole team on the two-way radio. In some areas they were making fairly slow progress. At one stage somebody asked how long they had to go before they could get out and they reported back they had some hours to go. There was not a sense of urgency, and they continued to punch through the forest. Approximately an hour later there was another call on the two way, and again they were asked how long it would take for them to get out if they turned around now. The driver said it would again be some hours, and the radio operator said that the fire was moving faster than anticipated and to stand by.

Shortly after there was a request on the two way asking everyone to keep the channel clear. The dozer operators were instructed to clear the immediate area as quickly as possible as the fire would be going over the top of them in 10 or 20 minutes. There were a lot of expletives on the radio from the dozer driver and then they got on





with the task at hand. I learned later that when the dozer drivers were told to dig in, they were 20 kilometres away from any clearing. They pushed down as many trees as time would permit take the topsoil off, then put the dozer in the middle of the clearing and buried it under a layer of topsoil. The driver then got under the dozer with a fire blanket.

While this was happening there was radio silence. Finally, after thirty minutes one of the dozer operators came in there and reported, 'Operator X all good'.

There was a huge sense of relief. The fire had gone over the top of them and they were safe.

Later that night we again assisted the dozer gang, pushing a road track through the forest. Again, it was probably three or four kilometre's back to again try and get around the fire.

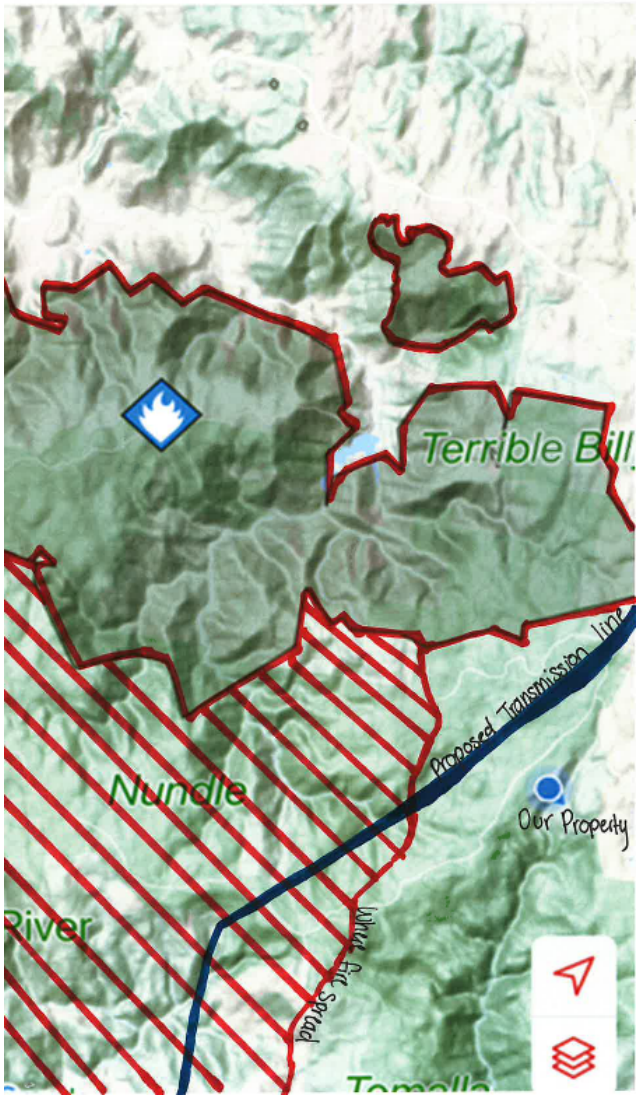


Tuesday 31 December 2019

We continued the backburning, but the sense of urgency had abated, and we got around the fire.

If the powerlines had been there, they would have been destroyed in the fire. I attach herewith a map that outlines where the proposed powerlines will be and where the fire spread.

Mark Grady.

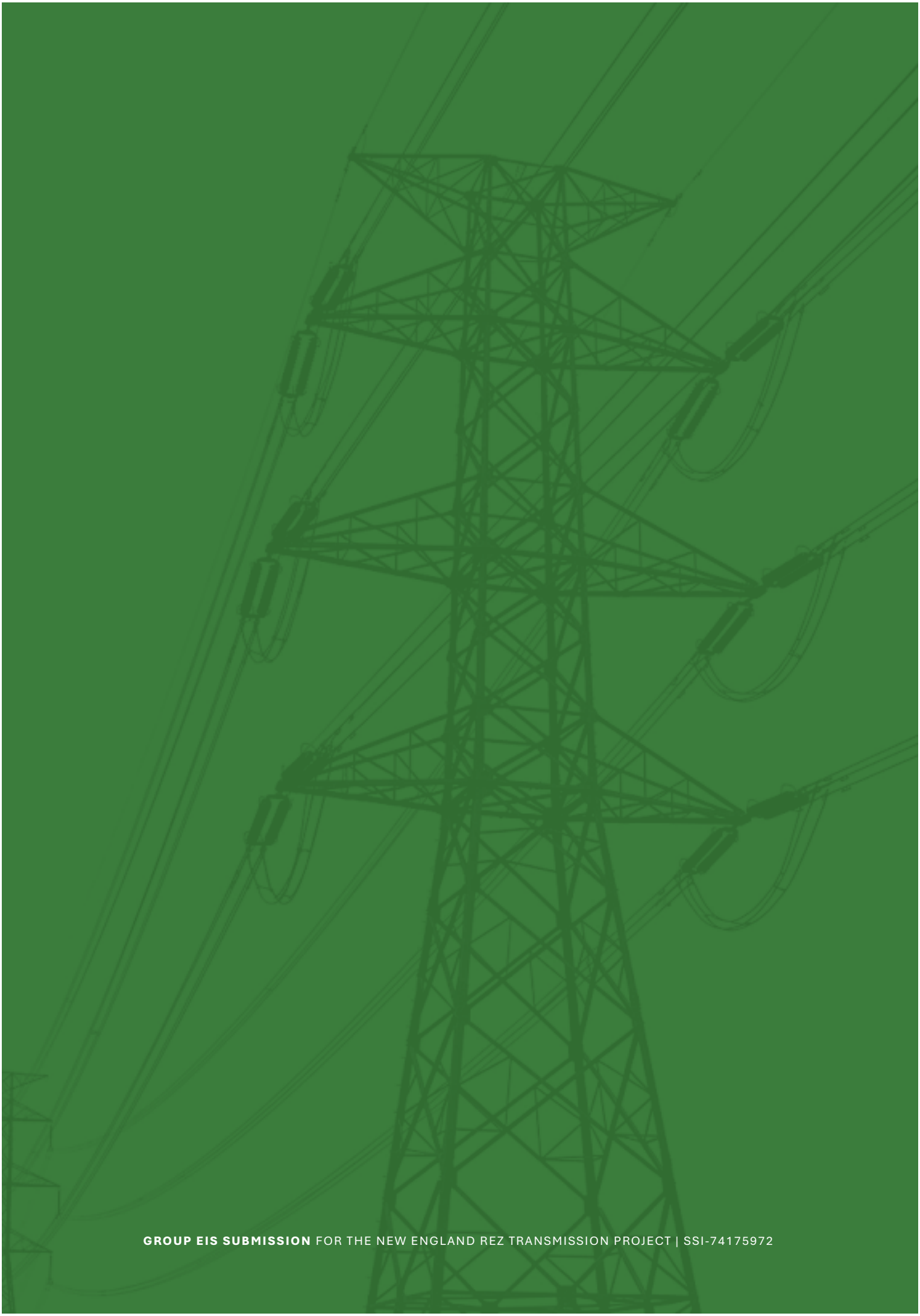




SECTION 6

Aviation: Agriculture, Private and Tourism

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 6

Aviation: Agriculture, Private and Tourism



Key issues we have found ...

Essential aerial agriculture is understated

Steep terrain makes aerial fertilising, seeding and spraying essential, yet the EIS understates reliance and fails to quantify production losses.

Airstrip impacts extend beyond owners

Affected airstrips serve neighbouring farms as well as owners, while relocation feasibility, shared access and associated infrastructure remain inadequately assessed.

Drone farming faces unassessed restrictions

Agricultural drones face easement restrictions, interference risks and lost treatment areas, without adequate assessment of operations, navigation, costs or liability.

Wire strikes demand stronger safeguards

New towers and conductors create obstacles for existing flying operations; charting and future notifications alone do not resolve collision risks.

Recreational flying has been overlooked

Private pilots, gliders, balloons and other recreational users need assessment of flight paths, obstacle visibility, emergency landings and construction activity.

Commit to safeguards and compensation

Develop aviation controls with affected users, publish relocation costs and secure enforceable compensation for farms and operators before granting approval.

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

Read in more detail >



> Aerial fertiliser spreading is essential on the plateau

SECTION **6**

Aviation: Agriculture, Private and Tourism

The first spreading of fertiliser by air in Australia took place in Walcha in 1950 and since then aerial agriculture has played an essential role in the development and maintenance of one of the most productive agricultural regions in Australia. Walcha is not the only LGA making use of aerial agriculture to be adversely impacted by the NERNIP, as landholders in all regions along the route have indicated their use of fixed wing, helicopter and drone services with relation to agriculture. Aviation enthusiasts, private small plane pilots, aero clubs and aviation tourism are also adversely impacted by the NERNIP.

Please note aerial firefighting is addressed separately.

EXECUTIVE SUMMARY

The New England REZ Network Infrastructure Project would introduce a continuous high-voltage transmission corridor through country where aerial agriculture, private aviation and other low-level flying are established activities. The EIS does not adequately establish the extent of those activities or assess the consequences of introducing new towers and conductors into that operating environment.

The principal deficiencies identified in this submission are:

- EnergyCo has not demonstrated adequate consultation with affected landholders, aerial service providers, agricultural drone operators, private pilots or community aviation groups.
- The agricultural assessment understates the practical importance of fixed-wing, helicopter and drone operations in steep and difficult country and does not adequately assess the loss of efficiency, production or access created by the transmission corridor.
- The aviation assessment identifies numerous uncertified aerodromes but does not adequately resolve impacts on affected strips, neighbouring users, associated infrastructure or the consequences of relocation.
- Agricultural RPAS operations are materially under-assessed, including the application of CASR Part 101, easement restrictions, electromagnetic interference, navigation risks and interaction with manned low-level aviation.
- Wire-strike and low-level aviation risks require substantially greater weight. Publication on charts and future notification do not by themselves resolve the risk created by new obstacles in an environment used for aerial application and other low-level flying.
- Mitigation, airstrip changes, marking, construction-phase controls, compensation and other measures are repeatedly deferred or described without sufficient plans, costings or enforceable commitments.
- The EIS should not be relied upon for determination until these matters are properly investigated, the affected aviation community is directly engaged, and the necessary mitigation and compensation measures are demonstrated and assessed.

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1 | Why aviation matters in this region

Aviation is not an incidental land use in the project area. It supports agricultural production, private and recreational flying, emergency access, rescue and recovery, and local aviation activity. The following material explains why the local operating context matters to assessment of the proposed transmission corridor.



> Figure 1 - **Aerial spreading of fertiliser is a crucial means of fertiliser distribution in the New England, especially in steep terrain. Airstrips are located on strategically important flat areas in the topography. They cannot easily be relocated.**

2 | The EIS has not adequately assessed existing aviation activity

2.1 Consultation with landholders

Energy Co has failed to engage with landholders across the board with regards to the impact of the NERNIP and especially so with regards to aviation. Energy Co has had detailed mapping and feedback from their "local aerial provider" consultant which they could have used to communicate with affected landholders. 67 uncertified aerodromes have been identified by Energy Co with15 classed as having major impact and a further 19 with moderate impact. Landholders of all air strips should have been engaged with, especially those whose strips that are deemed unusable.

Also – given the terrain of the associated area and the limited space for safe airstrips and the regions reliance on aerial agriculture, neighbours to airstrips (who often share the strip usage) should also have been engaged with to assess the impacts on them. Consultation with regards to agriculture lists 2 interviews, both from the same region, and well away from the high rainfall / high fertiliser use area of the Nundle and Walcha plateau. Given the diversity of agricultural practice along the NERNIP route, this is an act of gross negligence by Energy Co. Landholders were not engaged to assess the types nor frequency of the aerial agriculture that they use and the impacts that the NERNIP will have on their businesses. Landholders were not engaged with to negotiate planning for mitigation measures with regards to their requirements of aerial agriculture.



> Figure 1 - **Aerial fertiliser spreading in action**

2.2 Consultation with aerial service providers

Energy Co have stated that they consulted with one local aerial service provider to identify and assess uncertified aerodromes (page 39 of Technical Report 11- Aviation). This is insufficient consultation to cover the diversity of aviation that is impacted by the footprint of the NERNIP. The NERNIP EIS identifies 67 uncertified aerodromes, of these no reports are published in the NERNIP. The assumption made from reading the NERNIP EIS is that the consulted service provider operates with fixed wing as assessment has

been made of uncertified aerodromes. There is more than one aerial (fixed wing) service provider servicing the NERNIP and all should have been consulted.

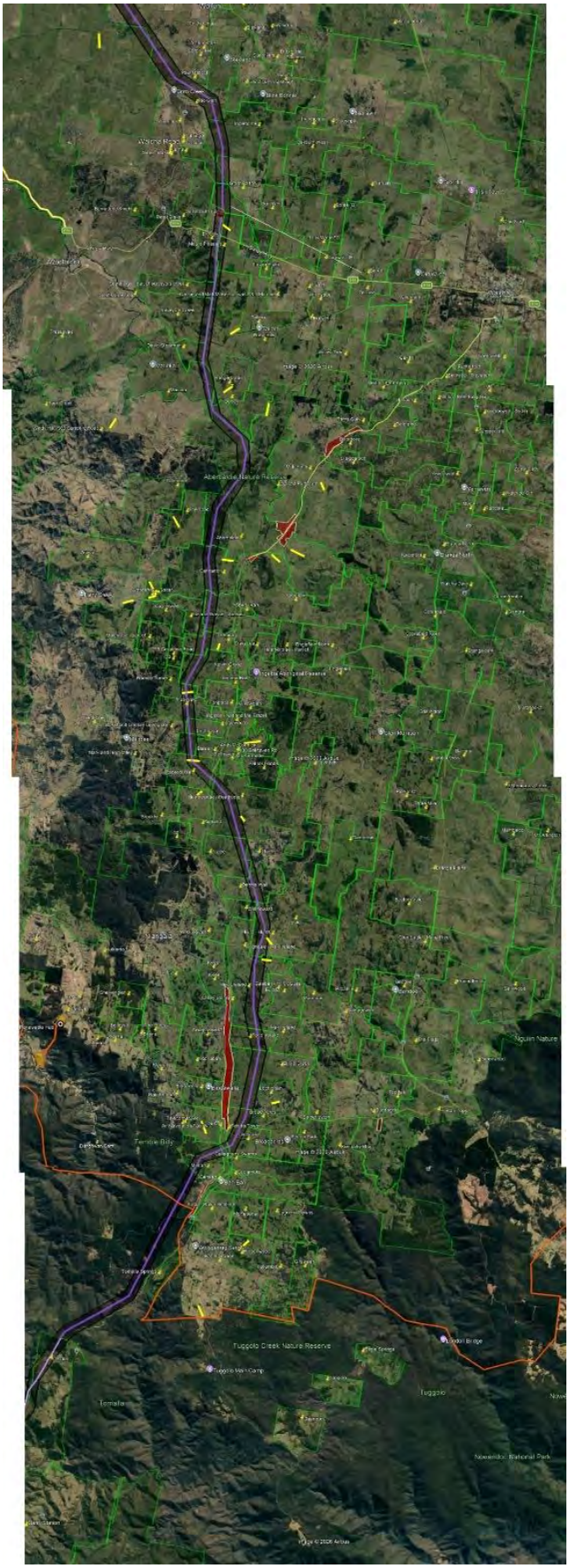
The EIS and supporting documents show no engagement with helicopter and drone agriculture service providers to ascertain the impact on their capabilities and hence the required mitigation measures for these businesses are also missing from the EIS. This is critical, as helicopters and drones work in different areas (where airstrips may not be available due to steep terrain).



> Figure 2 - **Helicopter being used to spread fertiliser in steep terrain along the transmission line (Property "Osland")**

2.3 Consultation with community aviation groups

There is no evidence in the EIS or Technical Report 11 – Aviation of any communication by Energy Co with community aviation groups. Given that aero clubs, aviation tourism and aviation sports all exist in communities impacted by the NERNIP these clubs and groups should be engaged with to ascertain the impacts on their activities. Clubs outside the NERNIP communities also exist that may be impacted by the transmission lines such as (but not limited to) parachuting, gliding, paragliding and ballooning



2.4 Mapping and information provided to affected users

Maps utilised in the NERNIP EIS with regards to aviation are not of a high quality nor are they of a consistent format between Technical Report 6 – Agriculture and Technical Report 11 – Aviation. Landholders have had difficulty identifying their air strips from the maps provided. Neighbours who make use of air strips have also found it difficult to identify strips that they use.

2.5 Consultation outcomes and design response

Energy Co states in Technical Report 11 - Aviation that a "*range of different tools and consultation activities have been used to provide information to the community and other stakeholders to provide opportunities for feedback including letters delivered to directly affected landholders. The letters sent out to landholders included sketch plans which identified known local airstrips (uncertified aerodromes).*" *Page 33* yet landholders state they have received no such communication that specifically refers to their airstrips. Given that fifteen airstrips have been assessed as having a major level of impact and a further nineteen at a moderate level of impact this lack of communication on Energy Co's behalf is negligent. Assessment procedures and results should have been published in the NERNIP EIS for scrutinisation. Energy Co have failed to identify any amendments to planning made after consultation with the local service provider and no explanations are provided for their unchanged plans.

> Aerial photo showing properties, and private airstrips in yellow, in close proximity to the proposed transmission corridor. Many of these are impacted directly by the presence of the proposed line, and would be put out of service.

Additionally, no consideration has been made by Energy Co in the NERNIP EIS regarding any infrastructure associated with impacted airstrips, such as hangers, water tanks, fertiliser dumping points and chemical storage facilities.



> Figure 3 - **Earthworks for preparation of second Hangar construction on Cannabri**



> Figure 4 – **Original Completed hangar, with site for second hangar in the background**

3 | Aerial agriculture - impacts on agricultural production

3.1 Regional practice and the importance of aerial agriculture

b. Lack of direct knowledge of best agriculture practice for associated regions

Page 64. Technical report 6 – Agriculture:

> *"Aerial agriculture is not intensively used in the operational area, as aerial applications are less frequent in smaller scale cropping enterprises and grazing situations than in irrigated crops such as rice and cotton. Despite this, some weed control and fertiliser applications would be undertaken by air."*

And further stated on Page 64. Technical report 6 – Agriculture:

> *"The frequency of the use of these airstrips has not been determined, although the use of aerial agriculture around the operational area is not high."*

With no assessment of frequency how can a statement such as this be made?



> Figure 5 - **Aerial spreading of fertilizer is the primary mode of spreading in areas that are hilly and high rainfall, where ground spreading is dangerous, or simply unable to be done.**

Intensity of use should not be a measure to degrade the use of aerial agriculture in the NERNIP region. Department of Primary Industries August 2020 Snapshot of the Northern Slopes and Tablelands *states*

> *"The Northern Slopes and Tablelands beef enterprises deliver the highest gross value of beef to NSW of any other region of $563.9m (ABS 2015/16)."*

2020/21 Ag Track data lists the Walcha LGA as the 8th highest producer of Beef in NSW of 95 regional LGAs.

Aerial fertiliser spreading is an essential and efficient way to boost pasture production along most of the route to ensure the quality and quantity of beef that is an essential commodity of NSW's economy. Energy Co identify 67 uncertified aerodromes in Table17.2 page 649 of the NERNIP EIS within 10 km of the project.

With fifteen uncertified aerodromes assessed with major impacts Energy Co has done nothing to assess loss of production due to inability to use these uncertified aerodromes or the additional costs of changed flight paths and loss of efficiency as aircraft need to bounce over transmission lines much higher than the lines common to the district.

Add to this the lack of assessment for the 19 strips that have a moderate impact and the impact on aerial agriculture on neighbouring properties that don't have uncertified aerodromes and the negligence of Energy Co's lack of planning and engagement is compounded.

Fertiliser spreading is not the only practice put in jeopardy by the transmission line path. Landholders also make use of aerial weed spraying, seed dispersal and feral pest management, all essential agricultural practices for best production results. Rugged and steep terrain, areas of swamp and large rocks and weather patterns all drive the necessity for aerial agriculture as on ground practices are either to dangerous, not possible at all or not as economically efficient. Often airstrips are placed on the only available space to do so, and they are often used by nearby neighbours along with the owner.

Again, on Page 64. Technical report 6 – Agriculture:

> *"Drones can also be used for mustering and livestock monitoring, while their use for pesticide spraying is being developed."*

Is a statement demonstrating the vast ineptness of Energy Co and their consultant for this document and further evidence of a significant lack of local consultation.

Drone use for pesticide and herbicide spraying is well developed and is utilised by many farmers along the transmission line route and while landholders have indicated that they make use of drones for livestock monitoring, they are not used extensively for mustering, especially in this region. Drones are also used for fertiliser spreading and seed dispersal, to monitor water points and general property infrastructure such as fence lines. As previously stated in this document no engagement has been made with local drone operators to ascertain impacts and necessary mitigation measures with regards to agricultural drone work. Drone usage is growing in demand as a cost-effective method of targeted practice of fertiliser application, weed management and seed dispersal. For whole property distribution fixed wing and helicopters remain the most efficient tools.

3.2 Agricultural impact assessment methodology

The LUCRA (Land Use Conflict Risk Assessment) detailed in Technical Report 6 – Agriculture is averaged across land use types and practices across the entire footprint of the NERNIP. Inadequate representation of regions requiring aerial agriculture skews the findings and needs to be rectified.

Biophysical strategic agricultural land (BSAL) mapping was instigated to assess and protect agricultural land from mining and coal seam gas projects. BSAL assesses *"levels of soil fertility, land and soil capability classes and access to reliable water and rainfall levels."*

Missing from BSAL's assessment is the production capacity and economic output of agricultural land. Given the history of high-performance agricultural output of the land surrounding the NERNIP a BSAL assessment is insufficient to assess the impact on agricultural output. As aerial agriculture is integral to the high-performance outputs the restrictions placed on aerial agriculture will have significant impacts on output.

Property value also gives a valuable indication to agricultural outputs, and this isn't used as an assessment tool in the NERNIP.

3.3 Route selection and positioning of infrastructure

> *"The project has been designed to avoid and/or minimise potential impacts to land use and property, consistent with the planning pillars and principles that have guided the iterative route selection .... It is acknowledged that in some locations, competing land uses, property and technical constraints are present. At these locations a balanced approach to corridor planning is required to determine the most appropriate project alignment, while minimising impacts on land use, property and the environment during construction."*
>
> > Source: Pages 494 - 495 NERNIP EIS

The initial selection of the 3km route, and the narrowing of the initial 3km study route to the current design has not demonstrated a *consistent* approach to minimising impacts to land use, especially with regards to aerial agriculture.

3.4 Case Study – "Gula Grazing" – Flight path conflict

The importance of the Gula Airstrip

The Airstrip at Gula services not only their own property, but 8-10 neighbours around the area. Like many airstrips, it is a critical piece of infrastructure for the properties and businesses around that areas. Each year, 2,000T of fertiliser is flown off that strip each year, 500T to one neighbour alone, who has not been recognised in this EIS assessment at all.

The production return from this fertiliser is substantial, and the loss of this ability to spread fertiliser, as a result of this strip being put out of action, is immense.

This example highlights the extend of the reliance of these airstrips, not only for the property that the strip is located on, but for neighbours who rely on its use also.

What is the earning capacity today - with pastures sown, and using fertiliser?

In its current state, with perennial grasses sown, and with 150kg of fertiliser being applied each year, this country is rated at being able to carry 20-25 dse (dry sheep equivalent) / Ha. This equates to around 3 dry cattle, or steers/heifers. Typically, these are introduced at 240kg, and carried to 500kg over the 12 month period, and sold on todays market at $5.50. That is, 260kg gain, at $5.50, across 3 steers / Ha

The Gross Margin on this enterprise is in the order of $1430 per steer, or $4,290 per hectare.

Costs of Fertiliser

Fertiliser is applied at a rate of $150kg/Ha, giving 15 units of Phosphorus, and includes Sulphur.

The cost of fertiliser, delivered, is around $500/T

The cost flying it out across this country, at a rate of 150kg/per hectare, can be generalised at $35/Ha, or $200/ T

The total cost of fertiliser, applied, is $700/T, or $105 / Ha.

Production levels without fertiliser

Without fertiliser use, there is a loss of one third of this production immediately, with a loss of up to 50% over time as pasture base is lost. This is supported by a number of studies.

Source	Trial description	Time without Fert	Main Result
O'Connor, Smart & Ledgard — Te Kuiti, New Zealand, 1990	Established hill pasture previously receiving 250 kg superphosphate/ha/year for ten years. Continued fertiliser compared with cessation.	Seven years	15 ewes/ha with fertiliser and 11 without: a 27% reduction
Lambert, Clark & Mackay — Ballantrae, New Zealand, 1990	Approximately 1,200 mm rainfall.	Seven years	measured results estimated 32% less pasture production in the previously high-fertility treatment
Dodd & Ledgard — Te Kuiti and Whatawhata, New Zealand, 1999	Longer follow-up of two fertiliser-withholding experiments.	15 years	Pasture production was 31% lower on average, with losses of 22–42%
McBride, Nguyen & Rickard — Winchmore, New Zealand, 1990	Productive irrigated grass–clover pasture, with fertiliser stopped after 25 years of annual superphosphate.	One to six years	pasture production fell 10% in year one and 28% in year two
Smith and colleagues — Winchmore, New Zealand, 2012	Long-term analysis of irrigated grass–clover pasture where superphosphate had stopped after six years of applications.	22 years	pasture retained 46–59% of the production of the continuously fertilised comparison: 41–54% less production

What is the cost of this lost production?

In addition to loss of dry matter production (production of grass), there is a loss of clover and other medic content in the pasture, diminishing perennial grass health, and ultimately quality and composition of the pasture. This is a loss that accumulates, as the pasture base fails over time.

As such, it is not just a loss of steer weight gain, but a loss of enterprise flexibility. The new business, losing the ability to fertilise, does not fatten cattle, they start to background them. They are not selling prime livestock, they are selling store stock. They are performing well below potential – and that costs a business owner when you borrow to buy country for it's potential.

Gross margin comparison – terminating Fertiliser use.

On a per hectare basis, if fertiliser use is terminated,

- costs are reduced by $105/Ha, but
- earnings are reduced, ultimately, by 50% of $4,290 per hectare, or $2,145

Nett result is a loss of $2,040 per hectare - from loss of fertiliser application alone.

Why not apply by ground?

This has to be noted, as someone in a Sydney office may not be aware of the background. The country is inaccessible by ground spreading machinery. It is steep, rocky, and often far too wet. The combination of these factors makes it inaccessible, and rules out ground application.

Why not use another strip?

The nature of the country does not allow a strip to be relocated easily. The naïve offer from Energy Co to do so, highlights the lack of understanding of the country they are proposing to build a transmission line through. The fact that 8-10 businesses are using this one strip is not a story of convenience, it is because the installation of a strip is complicated and difficult. Finding a suitable site is not easy in this topography.

What does this mean for the case study at Gula?

The estimated 2,000T of fertiliser that is flown off the strip at Gula, supports production across approximately 13,300 Ha of country, over a number of businesses.

In all, this supports additional productive capacity, as a result of fertiliser application, of $27,200,000

($2,040 of production lift, across 13,300 Ha).

$27,200,000 of productive capacity will be lost, annually, with the elimination of the Gula Airstrip alone.

Is Gula REALLY going to be taken out of commission?

The following photos show an aerial ag. pilot spreading fertiliser, working from the Gula Strip.



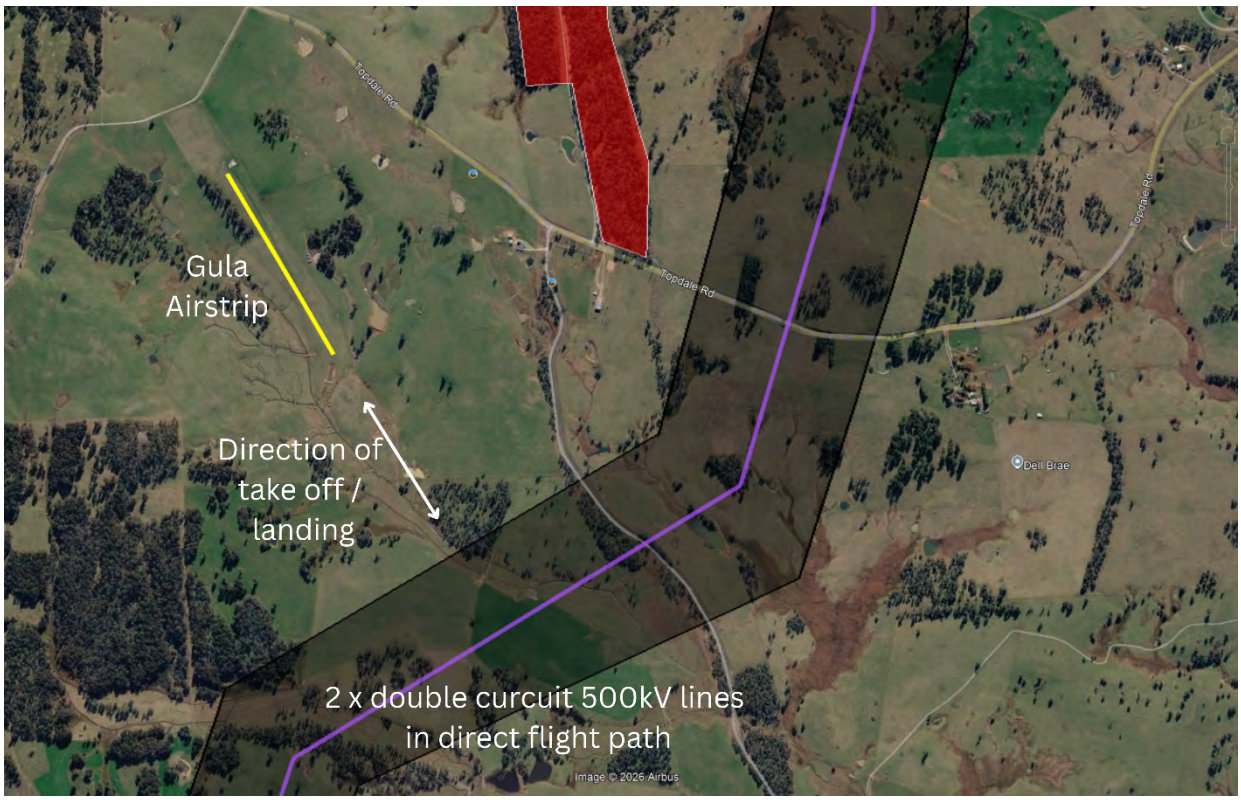
> Figure 6 - **Fertiliser spreading plane returning to land on, and taking off from, the Gula Airstrip. This is in the immediate area of the proposed 2 x 500kV Transmission lines.**

Given this backdrop, it was of particular interest to view the proposed outlook and viewpoint for the transmission lines that run directly in the flightpath of the Gala airstrip. This is shown below.



> Figure 7 - **Viewpoint of the proposed transmission lines, in the area in front of the Gula Airstrip, in the same location as the phots shown earlier of the fertiliser plane working from the strip.**

It is clear that the Gula airstrip is completely unusable, given the location of the proposed transmission line. Planes are unable to take off in the NW direction, due to topography. They will be unable to take off in the SE direction, due to transmission lines.



> Figure 8 – **Sat Photo of Gula airstrip, showing location of proposed transmission, and the forced flight path SE (downhill) from the strip.**

Local topography limits alternative locations for a strip.

Hilly country must use the slope of the land to shorten the length of the airstrip. This downhill run shortens the required runway length. As a result, all runways will use the shallow valley as a necessary flight path. This is precisely where the proposed transmission line is occupying space.

This eliminates the possibility of relocation of an airstrip on Gula, or any nearby land.



> Figure 9 - **Gula airstrip in the foreground, runs downhill into the proposed transmission line. Any available options for alternate strip locations, in the limited topography available, and needing to run downhill to obtain take-off windspeed, will do the same.**

3.4 Mitigation, cost and compensation

There are no costings listed in the NERNIP EIS associated with the impact or mitigation measures required with respect to aviation practices. Words such as “should”, “where feasible”, “may”, “compensation”, “management plan” are inadequate at this point of planning. The NERNIP EIS’s timing of mitigation measure planning at the detailed design phase doesn’t allow for appropriate feedback or sound economic critique.

Given the previous case study, as a single example of many, this is a massive omission.

4 | Aviation safety and wire-strike risk

The proposal adds large new obstacles to a landscape already used for low-level agricultural and private flying. The evidence below addresses the adequacy of EnergyCo's treatment of flight routes, operating heights, visibility and wire-strike risk.

Energy Co's reporting admits to limitations due to the report relying on publicly available data with respect to aviation practices in the NERNIP zone. As much of the impacted flying in the NERNIP zone is based off uncertified aerodromes by private operators Energy Co should have engaged with a variety of service providers, landholders and private pilots to better ascertain the routes, operating heights and required safety implementations to ensure all aviation participants return home safely and that aerial agricultural practices can operate at optimum efficiency.

The Walcha plateau is renowned for low clouds and fog; this is especially dangerous for pilots flying from west to east (and vice versa) toward and over the Walcha plateau and they must adjust appropriately to cater both for their machine's altitude ability and instrumentation and meteorological conditions. Pilots in smaller aircraft without instrumentation rely on visual flight lines and are allowed to drop below prescribed flight altitude if impacted by meteorological events. Although the transmission lines, towers, construction cranes and MET towers associated with development are all under CASA's height restrictions for safety devices, consideration should be given to the type of aircraft common to the project area and to the extensive obstacle that the transmission line poses, especially in unclear weather and for west to east (and vice versa) flight paths.

Efficiency of aerial agricultural practice has not been adequately assessed especially as helicopter and drone services have not been assessed at all. Impact on air traffic routes for efficient aerial agriculture practice have also not been reported. Changes in flight lines for aerial agriculture are going to be impacted and along with the required bump over the proposed lines efficiency of practice is going to be lost and costs are going to be greater, given that Energy Co declares that uncertified aerodromes have been assessed, that assessment should have been published and mitigation measures along with costings and compensation for these aerodromes should have been specified. Likewise, costings for aerial agriculture requirements for those who have made use of aerodromes now deemed unusable have not been published. Users of these aerodromes are going to incur additional costs as they will need to use facilities at a further distance.

The additional risk posed by the proximity of the NERNIP to most of the assessed uncertified aerodromes is downplayed by this statement

> *"Aerial application pilots undergo comprehensive training in low level flight operations, taking-off and landing fully loaded aircraft on short, undulating airstrips that are significantly below the normal aerodrome standard conditions, and often in close proximity to trees, buildings, transmission lines and wind farms."*
>
> > Source: Page 52: Technical Report 11 – Aviation.

While it is certainly true that aerial application pilots are extraordinary, the leading cause of accidents for the sector is wire strike:

The number of wire strike accidents rises and falls: 2016 was a bad year with 14 accidents, 6 of them involving helicopters. Those 14 accidents resulted in one death and 11 injuries. There were 10 accidents in both 2018 and 2020, while in 2021 and 2022, there were fewer deaths but a higher number of incidents.

During the 2012–2022 decade, 307 wire strikes were reported. Eleven of these involved drones.

- Of the other 296, 217 (73%) occurred while aerial work was being conducted.
- Of the 217 aerial work wire strikes, 194 (89%) occurred during agricultural spraying or spreading. [1]

Table 1: The breakdown of occurrences across the sector. Source: ATSB occurrence database (2014 to 2023)

Occurrence category	Mustering	Spreading/spraying	Other agricultural	Total
Fatal accidents	7	9	1	17
Total accidents	71	92	12	175
Serious Incidents	9	185	1	195
Incidents	10	59	6	75
Total	90	336	19	445

[2]

Sources for survey safety material (this page and next page)

[1] https://www.flightsafetyaustralia.com/2023/07/one-strike-and-youre-out/

[2] https://www.casa.gov.au/operations-safety-and-travel/safety-management-systems/sector-safety-risk-profiles/agricultural-flying-sector-safety-risk-profile/sector-safety-performance#Accidentspermillionflyinghours

[3] https://www.casa.gov.au/operations-safety-and-travel/safety-management-systems/sector-safety-risk-profiles/agricultural-flying-sector-safety-risk-profile/occurrence-types#undefined

The most common occurrence type for accidents and serious incidents over 10 years were:

- collision with terrain: 146 incidents and accidents
- loss of control: 62 incidents and accidents
- wirestrikes: 187 incidents and accidents.

See Figure 3 for the top 10.

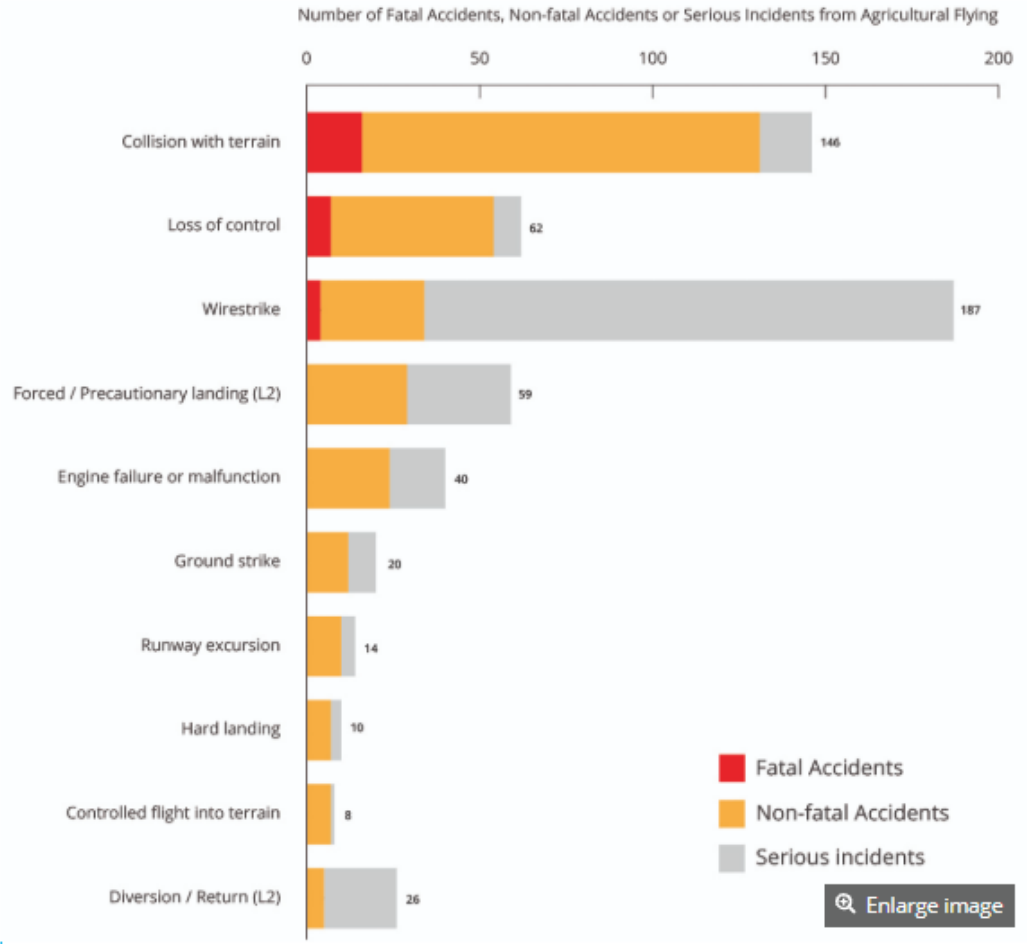


Figure 3: Top 10 most common occurrence type for accidents and serious incidents over 10 years

Published date: 24 January 2025

> Figure 10 - Source CASA - https://www.casa.gov.au/operations-safety-and-travel/safety-management-systems/sector-safety-risk-profiles/agricultural-flying-sector-safety-risk-profile/occurrence-types#undefined

[3]

The NERNIP plannings lack of consideration to highly trained aerial service providers is negligent and when you consider that many of these uncertified aerodromes are also used by private pilots who do not have either the experience nor machinery of the same capability as aerial service providers the lack of care and appropriate planning to avoid uncertified aerodromes is abhorrent.

5 | Agricultural drones - a material omission from the EIS

Agricultural RPAS operations raise distinct regulatory, operational and technical issues. The following two operator reports are retained as first-hand evidence. They should be read as operator accounts rather than rewritten into the main submission.



> Figure 11 - **An agricultural drone operating in a Blackberry spraying capacity**

5.1 Operator Report 1 - Technical critique of the aviation and agricultural assessments

Key Points

NE REZ EIS – Technical Report 11 (Aviation Impact Assessment) and Technical Report 6 (Agricultural Impact Assessment)

These comments are provided from the perspective of a landholder and an agricultural RPAS (drone) operator working on properties within 10 km of the proposed line west of Walcha.

1. Agricultural drones are not assessed

Technical Report 11 mentions drones only as equipment used for construction and maintenance (line stringing and tower assembly). Its definition of an "Aerial Application Operator" (a person or company required to hold a commercial pilot licence, an agricultural rating and a chemical distributor's licence) does not cover ReOC-based agricultural RPAS operators. In my experience these are now a common form of aerial application in the district.

Technical Report 6 (Agricultural Impact Assessment, s6.7) says that the use of drones "for pesticide spraying is being developed". This understates current practice. Agricultural spray and spreading drones are an established commercial service operated under CASA ReOCs, including my own operation in this district.



> Figure 12 - **Drone being used for visual observation of livestock and water points across steep and inaccessible country.**

2. Technical Report 11 does not consider Part 101 (unmanned aircraft)

Technical Report 11 lists the regulations and standards it was prepared with consideration of (s1.3 and References): the Civil Aviation Regulations, the Civil Aviation Safety Regulations 1998 (CASR), the Part 91, Part 139 and Part 173 Manuals of Standards, Advisory Circular AC 91-10 and NASF Guidelines F and G. Neither CASR Part 101 (Unmanned aircraft and rockets) nor the Part 101 Manual of Standards is referenced anywhere in the report. The only reference to the regulation of drones is the statement that drones used for stringing "will be operated in accordance with the applicable CASRs for their operations" (measure AS4).

Part 101 and its Manual of Standards are the rules that govern the agricultural RPAS operations most exposed to the line. They set the remote pilot licensing and ReOC requirements; the prohibition on hazardous operation, an offence of strict liability (reg 101.055, see concern 6); the RPA no-fly zones and approach and departure paths around non-controlled aerodromes, including agricultural strips (MOS Division 9.1, see concern 9); and the training and examination of remote pilots on powerlines and electromagnetic interference (MOS Schedules 4 and 5).

Similarly, the report does not reference CASR Part 137 (aerial application operations by aeroplanes), although aerial application is the main aviation activity assessed in its Table 8. It notes that flight below normal minimum heights is permitted "such as aerial application" without identifying the regulations under which that work is conducted. Part 138 is mentioned only in the peer review, in relation to aerial firefighting.

Because Part 101 was not considered, the assessment could not identify the constraints on drone operations described in this response: the operator's liability for working near the line, the effect of airstrip relocation on drone no-fly zones, and the interaction between manned and unmanned agricultural traffic.

> REQUEST TO ENERGYCO

Extend the regulatory review in Technical Report 11 to CASR Part 101 and the Part 101 Manual of Standards (and Part 137), and reassess impacts on agricultural aviation against them.

3. Agricultural impact is assessed only at airstrips

Table 8 of Technical Report 11 rates impacts by reference to take-off, landing and circuit operations at each strip. Low-level application work over paddocks near and under the line is not assessed.

For drone operators, who do not need a strip, the paddock is where the impact falls. Under the report's method, a property without a strip shows no impact even when it depends on aerial application.

Technical Report 6 (s6.7) also notes that "the frequency of the use of these airstrips has not been determined". The usage information in this survey response is provided to help fill that gap.

4. Properties that depend on a neighbour's strip have no defined role in mitigation

For majorly and moderately affected strips, Technical Report 11 proposes consultation with "owners and operators", an Uncertified Aerodrome Management Plan or a Property Management Plan prepared with the landholder, and possible funding of the cost difference to an alternative method.

It is not clear whether neighbouring properties that depend on an affected strip, or the contract operators who service them, are included. We have no airstrip of our own and depend on the goodwill of the owner of strip 18381 (rated Moderate). A one-way restriction, fewer usable wind days or relocation of that strip could raise topdressing costs or make it unavailable to us. Topdressing operators would likely operate from another suitable landing area, so any increase in ferry distance or weather constraint adds direct cost.

The property management plans in Technical Report 6 (measure AG3) apply to properties within the construction disturbance footprint, not to neighbouring properties or contract operators whose work is affected.

> REQUEST TO ENERGYCO

Confirm whether neighbouring properties that rely on an affected strip, and the contract operators who service them, will be consulted and considered in Uncertified Aerodrome Management Plans.

5. Drones are not a substitute for fixed-wing topdressing, and ground application is not a substitute for aerial work

Technical Report 11 refers to funding the cost difference to "a reasonable alternative method". If unmanned aircraft are considered such an alternative for displaced manned operations, in my professional view they are not a practical substitute for bulk fertiliser topdressing over large areas. Drone operations near the line are also constrained themselves (see concerns 6 and 7).

Technical Report 6 (s6.7) accepts that areas unable to be treated from the air would have to be treated on the ground, which is "less efficient, less timely and more costly in most cases", and that "some steep or inaccessible areas … may not be able to be treated effectively by other methods". Much of the land we work in this area is steep grazing country where aerial application is the practical option.

6. Electric and magnetic fields are a hazard to drones, not just a physical obstacle

Technical Report 11 treats the line only as a physical obstacle to see and avoid. Its interference assessment covers only air traffic radar, navigation aids and communications.

High-voltage lines produce strong electric and magnetic fields (EMF) around the conductors, and can generate radio noise. A drone's compass/magnetometer, GNSS/RTK positioning, command-and-control link and obstacle-detection systems can be affected, which can cause erratic behaviour or loss of stability. Network operators recognise this: Powerlink and Transgrid both advise drone pilots to move away and land if a drone shows "erratic behaviour" near their infrastructure.

EnergyCo's own fact sheet (Electric and magnetic fields, October 2025) states that "Transmission lines of 330kV and 500kV generally emit 10-50mG at the edge of a high voltage transmission line easement and 20-200mG directly underneath". Directly under the line, that is a meaningful fraction of the Earth's magnetic field (roughly 550–600 mG in this region), which is what a drone's compass relies on.

Published separation guidance is inconsistent. Technical Report 6 (s6.7) recommends approximately 30 to 45 metres, citing a 2020 general drone-safety article from Indiana Electric Cooperatives (USA), not an Australian regulatory source. Powerlink recommends a minimum of 6 metres. EnergyCo and Transgrid prohibit drones within easements altogether (see concern 7).

CASA recognises this hazard. The Part 101 Manual of Standards requires remote pilots to be trained and examined on "electromagnetic interference (EMI)" and "powerlines" (Schedule 4, Unit 4 REES, item 9, a Priority B topic). It also requires pilots to show awareness of powerlines as a non-weather hazard (Schedule 5, Unit 18 RNT, item 2).

Wire strikes by agricultural drones are already occurring in Australia, and the consequences go well beyond the loss of the aircraft. On 29 January 2025 at Nangkita, east of Mount Compass (SA), a DJI Agras T50 spray drone reportedly struck a powerline while spraying a dairy paddock. The drone was destroyed, power to the area was lost, and the resulting grass fire burned about 8 hectares and came within about 50 metres of a house. The CFS attended with around 35–40 firefighters and six aircraft and reported that the fire was believed to have been started by the drone bringing down the line (Victor Harbor Times, 30 January 2025; Aviation Safety Network record 474183).

On 10 June 2026 at Wasleys (SA), a contractor's spray drone struck a powerline and brought down a high-voltage line, cutting power to 58 customers for more than three and a half hours. SA Power Networks then issued a public warning about agricultural drones near powerlines, noting that strikes could cause serious harm to the operator or start fires (Plains Producer, 12 June 2026; Barossa Leader, 17 June 2026).

Both incidents involved distribution lines rather than 500 kV transmission lines, and I am not aware of any ATSB investigation of either. They show, however, that a drone wire strike can cause outages and start fires, which is why operators must keep a wide margin from lines whose position, sag and field effects are not precisely known.

CASR regulation 101.055(1) (Hazardous operation prohibited) provides: "A person must not operate an unmanned aircraft in a way that creates a hazard to another aircraft, another person, or property." This is an offence of strict liability (reg 101.055(3A)), so the onus falls squarely on the operator. Where guidance is inconsistent and line-specific data is not available, a responsible operator must apply conservative standoff distances. In practice, that takes land near the line out of drone application work, an impact Technical Report 11 does not recognise.

> REQUEST TO ENERGYCO

- Provide the project-specific EMF modelling for the line (magnetic and electric field strengths at distance from the conductors and at height, not only at ground level).
- Provide final design data, so operators can set evidence-based standoff distances rather than overly conservative ones.

7. Drones are prohibited within the easement

Technical Report 6 (s6.7) states that "EnergyCo's guidelines indicate that flying drones is not permitted within transmission line easements". EnergyCo's "Living and working near transmission line easements" web page confirms this: it lists "flying kites or any remote controlled or unmanned aerial vehicles (such as drones)" among activities not permitted in easements. Transgrid's October 2024 fact sheet likewise states that drones are "Not allowed within or over the easement of transmission lines".

A dual 500 kV easement is typically about 140 m wide (Technical Report 11, s1.2). The prohibition therefore removes a continuous strip of land along the line from drone application altogether, plus any additional standoff distance needed outside the easement.

By contrast, EnergyCo permits cropping up to 30 metres from the base of a transmission structure, and its web page states that "aerial activities can continue in the vicinity of transmission lines". Ground-based farming can continue across most of the easement, but agricultural drone application cannot.

> REQUEST TO ENERGYCO

- Confirm whether the prohibition applies to agricultural spray and spreading drones working alongside (not within) the easement, and what lateral and vertical separation applies.
- Confirm whether a consent or permit process is available for agricultural drone operations within or over the easement, subject to a safety assessment.
- Quantify the treatable area lost on affected and neighbouring properties.
- Explain how landholders and contract operators will be compensated for that loss.

8. Mitigation for aerial agriculture relies on a report that contains none for drones

Technical Report 6 rates the risk to aerial agriculture activities as A4 (16) before mitigation and A5 (11) after, on the basis that impacts "would be managed in accordance with measures set out in a separate aviation report" (land use conflict risk table, p.71; also s5.7).

That aviation report, Technical Report 11, contains no assessment of, and no mitigation for, agricultural drone operations. None of Technical Report 6's own measures (AG1–AG12) addresses aerial agriculture. The reduced risk rating is therefore not supported by any measure as far as drone operations are concerned.

Technical Report 6 also considers GPS impacts unlikely because no large-scale cropping enterprises were identified (s6.5.2), while accepting that "VHF receivers used in conjunction with GPS system may experience some interference" (s6.12). Drones depend on GNSS, RTK correction links and radio command-and-control links.

> REQUEST TO ENERGYCO

- Extend measure AG10 (GPS impacts) explicitly to RPAS navigation, RTK corrections and command-and-control links.
- Add a specific mitigation measure for agricultural RPAS operations.

9. Relocating airstrips could create new drone no-fly zones

Under the Part 101 Manual of Standards (Division 9.1), a non-controlled aerodrome has an RPA no-fly zone extending 3 NM from its runways, plus approach and departure paths extending 7 km. While a manned aircraft is operating in that airspace, a drone operator must manoeuvre away and land as soon as safely possible (ss 9.03–9.04).

Technical Report 11 proposes relocation or realignment of affected airstrips as a possible mitigation. As these rules appear to apply to private agricultural strips, a relocated strip could place a new no-fly zone over paddocks where drone application work is conducted. Increased manned activity at remaining strips such as 18381 could also increase drone downtime.

> REQUEST TO ENERGYCO

- Consider existing RPAS operations when assessing any airstrip relocation.

10. Manned and unmanned traffic may be concentrated in the same area

Strips close to the corridor west of Walcha (O-32 rated Major; O-33-1, O-33-2, O-33-3 and 18381 rated Moderate) are expected to have restricted operations. Manned agricultural activity may shift into the band between the corridor and Walcha, where drone application work is also conducted.

This potential mixing of manned and unmanned low-level traffic has not been assessed.

11. Charting is not an adequate mitigation for low-level work

Technical Report 11 relies heavily on the line being published on aeronautical charts. The Airservices Aeronautical Chart User Guide (s6.6, note e) states that "Only structures above 300FT AGL are shown" as obstacles.

The towers (typically 45–75 m, assessed at up to 80 m, about 150–260 ft) are therefore unlikely to be charted as obstacles, although the line may appear as a power transmission line feature. The visual charts covering this area are at 1:250,000 scale or smaller, which is not suitable for paddock-level planning.

Mitigation measure AS2 lists agencies, aerodromes and landholders within 10 km to receive final design data, but not local aerial application operators, including ReOC holders.

Knowing where a wire is, or having it on a chart, does not by itself prevent wire strikes. The ATSB education booklet Wirestrikes involving known wires (AR-2011-028), as cited in ATSB occurrence brief AB-2026-037, records that "63 per cent of wirestrike accidents occurred with pilots aware of the wire position". CASA's agricultural flying sector safety risk profile (January 2025) notes that "wire strikes continue to rise, especially in aerial application operations".

Recent fixed-wing agricultural accidents investigated by the ATSB include:

- 18 July 2024, 19 km south-east of Lake Cargelligo (NSW): during aerial agricultural spraying, an Air Tractor AT-502 "struck a wire and subsequently collided with terrain". The pilot was fatally injured (ATSB AO-2024-042; final report pending).
- 8 September 2025, 17 km north of Cummins (SA): an Air Tractor AT-802A spraying wheat fields crossed by 19 kV single-wire earth return lines about 12 m above the ground. Recorded data showed the pilot "conducted a right turn underneath the second power line after which the aircraft collided with terrain". The pilot was fatally injured (ATSB AO-2025-053; preliminary report, no findings yet).
- 26 August 2011, near Mogumber (WA): an Air Tractor AT-802 struck "an unseen fourth set of powerlines" during spraying, although the pilot had inspected the field using the farmer's map showing two powerlines (ATSB AO-2011-107).

Airstrips are also affected. In its investigation of a fatal wire strike on approach to a private grass strip near Merriton (SA) on 8 October 2023 (Cessna 172N, AO-2023-046), the ATSB found the powerline "was not marked in a manner sufficient to enhance visibility for pilots using the runway – nor was there a requirement to do so". The ATSB Chief Commissioner said that "airstrips on rural properties should be well separated from powerlines, even when the strip is only intended for use by pilots familiar with the wires". This applies directly to strips close to the corridor and to any relocated strip (see concern 9).

Agricultural and other low-level helicopter operations show the same pattern, including the accident nearest to this project:

- 18 June 2026, near Glen Innes (NSW): a Bell 206B spraying a 690-hectare property struck a single-wire earth return line that the pilot had identified and had been crossing during earlier runs. The wire caught in the spray equipment, the wire-strike protection system was ineffective, and the helicopter rolled over and was substantially damaged. The pilot was uninjured (ATSB AB-2026-037).
- 6 March 2026, near Orange (NSW): a Bell 206L-3 spraying near unmarked powerlines, both of which the pilot had identified, struck a three-wire line after deviating from the planned spray path. The wire-cutting kit cut two of the wires, but the third struck the main rotor and tail boom (ATSB AB-2026-016).

- 26 May 2021, 75 km west-north-west of Hay (NSW), mustering: a Robinson R22 flown towards cattle yards contacted a single-wire earth return line, which the ATSB described as "very difficult to detect", and the pilot was fatally injured. Because mustering to the yard had not originally been planned, no aerial inspection was done and the hazards at the yard were likely not considered (ATSB AO-2021-020).
- 31 July 2020, Steam Plains near Hay (NSW): a Robinson R44 conducting weed spraying struck a powerline that crossed its flight path, and the pilot was fatally injured. The ATSB found that "the pilot knew the wire existed" but had not conducted an aerial inspection on the accident flight (ATSB AO-2020-040).
- 13 March 2019, Bool Lagoon near Naracoorte (SA): a Robinson R44 spraying along a drainage channel struck a powerline after the pilot "momentarily forgot about the location" of it. The helicopter was destroyed. The ATSB noted that "it may not be possible to completely mitigate the risk of wirestrike during repeated low-level flying near powerlines" (ATSB AO-2019-011).
- 19 March 2018, Pappinbarra (NSW), aerial weed survey: a Bell 206L flying at 200 ft struck "an unknown and unseen 11 kV powerline". The span was 650 m long, its poles were obscured by trees and a building, and it ran perpendicular to the other powerlines along the valley. The wire-strike protection system severed the line and the helicopter landed in a paddock; one passenger had minor injuries (ATSB AB-2018-039).
- 25 March 2016, near Carmila (Qld): a Bell 206B spraying cane fields struck a powerline and the pilot was fatally injured, despite upper and lower wire-strike protection. The supporting poles were masked by trees against a low-contrast background (ATSB AO-2016-027).
- 10 April 2015, near Marion Bay (SA): a Robinson R44 dispensing herbicide struck "a previously unidentified power line", although the pilot had conducted an aerial survey of the area beforehand (ATSB AO-2015-037).
- Where the reports identify the wire, these accidents involved distribution lines or other low wires, not transmission lines. The project will add much larger structures to the same low-level environment. Technical Report 11 commits to marking only where a pilot considers the line could affect aerial application, and then only "where feasible".

> REQUEST TO ENERGYCO

- Provide final tower coordinates, heights and conductor sag profiles directly to local aerial operators, including ReOC holders, in GIS format.
- Commit to marking the line in accordance with AS 3891.1 wherever it crosses or adjoins paddocks used for aerial application or lies near an uncertified aerodrome, as identified with local operators, rather than only "where feasible".

12. Walcha aerodrome (YWCH) is not mentioned

Walcha Aerodrome (YWCH) is a registered, uncertified aerodrome published in ERSA (CTAF 126.7). Its entry notes "full NOTAM service not available". YWCH appears unlabelled on Technical Report 11 Figure 18, by my measurement about 6 NM (11 km) east of the corridor, just outside the 10 km search radius. I could not find it on the Technical Report 6 airstrip maps (Appendix 5, Figure 4.5b), although Armidale and Scone airports are shown on other maps in that series.

Its main runway (06/24) is aligned roughly east–west (about 072°/252° true), so runway 24 departures and runway 06 approaches are over the area towards the corridor. Camp 4 and a construction laydown at the Central-South Hub on the Oxley Highway (by my estimate 12–13 km from YWCH), and

construction helicopter, drone and crane activity along the corridor, will add activity in the airspace used by aircraft operating to and from YWCH.

Neither the aerodrome operator (Walcha Council) nor local aerodrome users are on the construction notification list (AS3). Direct notification would help ensure local users are aware of construction activity.

> REQUEST TO ENERGYCO

- Assess YWCH and add the aerodrome operator to the AS2 and AS3 notification lists.

13. Mapping and data accuracy

Technical Report 11 Figure 18 shows an unlabelled airstrip on the corridor west of 18381. O-31 and P-32 are listed in Table 8 but do not appear in any figure caption. O-33-1 is noted as having "no defined airstrip visible on satellite imagery". Its rating says operations "may be restricted to the west", which is ambiguous for a strip east of the line.

Technical Report 11 also gives two different dates for the Civil Aviation Regulations: "Civil Aviation Regulations 1998 (CAR)" in s1.3 and "Civil Aviation Regulations 1988 (CAR)" in its References. The correct title is the Civil Aviation Regulations 1988.

Technical Report 6 gives two different figures for uncertified aerodromes within 1 km of the project: "approximately 32" (s4.4) and "approximately 15" (s6.7). Its airstrip maps (Appendix 5) do not label the aerodromes, so they cannot be cross-referenced to Technical Report 11 Table 8.

14. Consultation with agricultural operators

For aerial application, Technical Report 11's operator input came from a single unnamed "local aerial provider" (Table 2). The AAAA (Aerial Application Association of Australia) policy quoted in the report calls for consultation "honestly and in detail with local aerial application operators". The AAAA is not listed in the consultation table, and no agricultural drone operator is identified. – To my knowledge they are not affiliated with Unmanned Aircraft or their operators.

> REQUEST TO ENERGYCO

Engage directly with local agricultural RPAS operators, not just the AAAA.



Figure 13 - **Agricultural Drone operating in a blackberry spraying capacity.**

5.2 Operator Report 2 - Agricultural drone impacts and operational experience

Agricultural drone impacts of the New England REZ transmission project

1 November 2026

Position and operational experience

I oppose the proposed overhead transmission infrastructure across the New England Renewable Energy Zone project because it threatens essential aerial agricultural access. The completed agricultural assessment, as described to me, misrepresents agricultural practice in my service area by suggesting that aerial agriculture is being phased out and replaced by ground equipment. That premise is inaccurate for the country I service and provides an unsound basis for assessing the project's agricultural impacts.

I provide agricultural drone services to multiple client properties around Walcha and towards Niangala using a DJI Agras T100. My services include aerial seeding, fertiliser spreading, paddock spraying and targeted weed control, including blackberry treatment. Agricultural drones are expanding their role in spraying, seeding, fertiliser spreading and farm monitoring. They provide a cost-effective means of working difficult terrain while reducing the need to expose ground operators to hazardous conditions. In my service area, drones increasingly replace ground equipment for suitable tasks. This submission objects to the whole New England REZ transmission project; the local experience described here demonstrates why assumptions about replacement by ground machinery must be tested across affected regions.

The existing assessment does not reflect local agricultural practice

Steep slopes, timber and difficult terrain make substantial areas I service inaccessible to tractors, trucks and other ground equipment even in dry conditions. Where ground access is possible, the terrain can make treatment extremely costly. During periods of high rainfall, saturated ground further restricts access because of bogging, loss of traction and unsafe operation on wet slopes. These seasonal restrictions also affect land accessible in dry weather.

Drones provide essential treatment access, subject to suitable flying conditions, where ground machinery cannot safely or practically operate.

I have been verbally advised that the completed project assessment presents aerial agriculture as declining and being replaced by ground equipment. I dispute that account as inaccurate and inapplicable to my service area: my operational experience is of increasing drone use, including substitution for ground equipment. The existing assessment must be corrected to reflect local terrain, seasonal access constraints and current agricultural practice, with direct input from working operators and farmers.

Agricultural activities and costs omitted or understated

The completed assessment's premise that ground equipment can replace aerial services does not reflect the range of work affected: low-altitude paddock spraying, targeted weed treatment, aerial seeding and fertiliser spreading. Wider farm uses include stock mustering and livestock monitoring, vermin monitoring and control where lawfully authorised, trough and water-infrastructure inspections and general reconnaissance. These wider uses illustrate the developing role of drones; they are not all services my business currently provides.

In the operations I describe, spraying is conducted close to the target vegetation, while paddock seeding and fertiliser spreading are typically carried out at about 20 metres above the ground. These are descriptions of operating practice, not universal requirements or safe clearances from wires. Terrain and the actual conductor heights must be considered together. Transmission corridors can fragment a paddock into separate operational areas. If flights cannot cross or work within the corridor, additional turns, repositioning, launch locations and separate missions may be required. I expect this to increase operating time and charges to farmers. Substituting ground treatment can be extremely costly on difficult terrain and is impossible on some country, including during wet periods. An assessment that assumes ground machinery will replace aerial services fails to account for these practical constraints and risks understating additional costs, delayed treatment and loss of effective weed and pasture management.

Restrictions and navigation evidence

The proposed backbone infrastructure is rated at 500 kV, or 500,000 volts. EnergyCo's current New England REZ landholder information indicates a final easement approximately 140 metres wide for dual lines, or 60 to 70 metres for single lines; widths can increase for long spans and require property-specific confirmation. These are total easement widths, not drone clearance distances. [5]

Transgrid's published guidance states that drones are not allowed within or over its transmission-line easements. This is evidence of Transgrid's published position. Restrictions on aerial access have direct consequences for the agricultural services described in this submission. [1]

The DJI manual warns that high-voltage lines can be sources of interference affecting flight orientation and location accuracy and instructs operators to use RTK in an environment free from radio interference. Any resulting loss of positioning accuracy or control could cause a collision, equipment damage and financial loss. These navigation risks, including for operations relying on RTK positioning, reinforce why a ground-replacement premise cannot establish that agricultural impacts are acceptable. [2]

Warranty insurance and liability

The DJI manufacturer warranty supplied with my drone excludes powerline strikes from its first-year collision protection. This is separate from insurance. DJI's published collision-warranty provision is conditional on flight-log assessment and non-human causes and excludes scenarios involving linear obstacles. [3]

Specialist drone insurance exists for accidental third-party property damage and agricultural operations, but full powerline-strike cover cannot be assumed. One published policy excludes indirect or consequential loss, including third-party business interruption, and excludes illegal or uninsured activities. The policy schedule and endorsements determine actual cover. No insurer has confirmed acceptance of my particular T100 operations near these proposed lines. [4]

Farmers are not automatically liable merely because work occurs on their land. Aircraft-damage law, negligence, contracts and workplace-safety duties nevertheless require examination. No reliable Australian count specifically of agricultural drone powerline collisions was identified; crewed-aircraft wire-strike figures must not be represented as drone statistics.

Conclusion and requested action

I dispute the accuracy of EnergyCo's completed agricultural assessment. The premise verbally communicated to me that aerial agriculture is being phased out in favour of ground equipment is inaccurate for the Walcha-Niangala country I service. It fails to reflect increasing drone use, permanent terrain constraints, wet-weather inaccessibility and the high cost of ground treatment. The project should not proceed as proposed where it would impair essential aerial agriculture. Its existing agricultural conclusions should not be relied upon without correction and independent scrutiny informed by working operators and affected farmers. These objections apply across the project.

For the typical client properties I service, I estimate that the additional cost of replacing drone services with ground-based methods would, in a single year, exceed the entire proposed twenty-year payment offered. Work completed quickly by drone would require labour-intensive ground crews, including people spot-spraying on foot where access allows. Farmers would face these recurring costs year after year, making the proposed payment inadequate to offset the ongoing impact.

If the project proceeds despite this objection, require enforceable arrangements preserving workable agricultural access and compensating demonstrated losses and additional costs. Require a network-owner and operator waiver of accidental-strike claims during lawful agricultural work, supported by project-funded indemnity or insurance for infrastructure

damage, legally recoverable supply-interruption claims and defence costs. Third-party exposure must be addressed explicitly. These safeguards require legal drafting and cannot displace aviation or workplace-safety obligations. They do not constitute support for construction.

Sources

[1] Transgrid, Flying uncrewed aerial vehicles near Transgrid infrastructure, October 2024: transgrid.com.au/media/jm0d33o4/uncrewed_aerial_vehicle_fact_sheet_oct_24.pdf
[2] DJI, AGRAS T100 User Manual, Australian edition, September 2025, pp 13–18 and 35: dl.djicdn.com/downloads/t70_t100/20250926/T100_User_Manual_v1.0_au.pdf
[3] DJI, T100 specifications and collision-warranty qualification: ag.dji.com/t100/specs
[4] One Underwriting, UAS policy wording, October 2021, third-party liability and general exclusions; linked at oneunderwriting.com.au/Products/Drone. Sources accessed 1 November 2026.
[5] EnergyCo, Landholder information for the New England REZ Network Infrastructure Project: energyco.nsw.gov.au/our-projects/new-england-rez/network-infrastructure-project/landholder-information. Accessed 1

6 | Uncertified aerodromes and aviation infrastructure

The EIS identifies a large number of uncertified aerodromes but the submission raises unresolved questions about affected strips, neighbouring users, associated infrastructure, relocation and the adequacy of the mapping used to communicate those impacts.

6.1 Airstrip impacts and associated infrastructure

Positioning Infrastructure

> *"The project has been designed to avoid and/or minimise potential impacts to land use and property, consistent with the planning pillars and principles that have guided the iterative route selection …. It is acknowledged that in some locations, competing land uses, property and technical constraints are present. At these locations a balanced approach to corridor planning is required to determine the most appropriate project alignment, while minimising impacts on land use, property and the environment during construction."*
>
> Pages 494 - 495 NERNIP EIS

Narrowing of the initial 3km study route to the current design has not demonstrated a *consistent* approach to minimising impacts to land use, especially with regards to aerial agriculture.

6.2 Mapping deficiencies

High-quality maps

Maps utilised in the NERNIP EIS with regards to aviation are not of a high quality nor are they of a consistent format between Technical Report 6 – Agriculture and Technical Report 11 – Aviation. Landholders have had difficulty identifying their air strips from the maps provided. Neighbours who make use of air strips have also found it difficult to identify strips that they use

6.3 Consultation and explanation of unchanged design

Description of consultation process and the issues raised and identify where the design of the development has been amended in response to these issues. Where amendments have not been made to address an issue, an explanation should be provided

Energy Co states in Technical Report 11 - Aviation that a "*range of different tools and consultation activities have been used to provide information to the community and other stakeholders to provide opportunities for feedback including letters delivered to directly affected landholders. The letters sent out to landholders included sketch plans which identified known local airstrips (uncertified aerodromes)." Page 33* yet landholders state they have received no such communication that specifically refers to their airstrips. Given that fifteen airstrips have been assessed as having a major level of impact and a further nineteen at a moderate level of impact this lack of communication on Energy Co's behalf is negligent. Assessment procedures and results should have been published in the NERNIP EIS for scrutinisation. Energy Co have failed to identify any amendments to planning made after consultation with the local service provider and no explanations are provided for their unchanged plans. Additionally, no consideration has been made by Energy Co in the NERNIP EIS regarding any infrastructure associated with impacted airstrips, such as hangers, water tanks, fertiliser dumping points and chemical storage facilities. MAT ONSLOW'S PICTURES with captions stating existing hanger and foundation works for another

7 | Aviation activities not included in assessment

The EIS assessment is also challenged on the basis that it does not adequately address the broader low-level and recreational aviation environment. The following material is retained as a discrete aviation objection.

The objection centres on critical omissions within "Technical Report 11 Aviation Impact Assessment.pdf" (prepared by Aviation Projects, September 2026).

While the report addresses commercial aerodromes, agricultural operations, and emergency services, it fails entirely to assess the severe safety impacts the proposed 80-metre high-voltage transmission lines (HVTLs) will have on local recreational and unpowered aviation activities.

Primary Ground for Objection: Incomplete Assessment Scope

Under the Secretary's Environmental Assessment Requirements (SEARs) (Technical Report 11, Section 1.3.1, Table 1, Page 22), the proponent is required to "Assess potential impacts on aviation safety".

A review of Section 4 ("Existing Aviation Operations") and Section 6 ("Aviation Impact Statement") of the Technical Report reveals a complete omission of specific recreational and low-level aviation activities. The EIS cannot be considered comprehensive or complete until the hazards to the following airspace users are formally assessed and mitigated:

Unassessed Aviation Activities and Associated Hazards

The introduction of dual 500 kV and 330 kV transmission lines, with towers up to 80 metres Above Ground Level (AGL) (Technical Report 11, Section 1.2, Page 19), introduces fatal hazards to the following unassessed activities:

Activity	Hazard
Hot Air Ballooning	Balloons have limited directional control and rely on wind currents. Sudden wind shifts can push balloons into towers. The extensive transmission corridors permanently remove vast tracts of land that serve as necessary safe zones for unplanned or emergency landings.
Gliding and Hang Gliding	Unpowered flight relies strictly on the availability of clear agricultural paddocks for emergency "out-landings" when a pilot loses thermal lift. The project will fragment these open spaces, removing vital emergency landing sites. Furthermore, high-voltage wires are notoriously difficult to see from the air until evasive action is impossible.
Recreational & Agricultural Drones and Model Aircraft	The 500kV and 330kV lines generate significant Electromagnetic Interference (EMI) capable of disrupting radio control frequencies, GPS signals, and internal drone compasses, leading to loss of control. Additionally, the infrastructure creates massive physical obstacles that obstruct the visual line of sight legally required by aviation regulations (CASR Part 101).
Parasailing, Parachuting, and Paragliding	These sports are highly vulnerable to wind drift during descent. The presence of new 80m AGL HVTLs introduces an unassessed, fatal entanglement and electrocution risk should an operator be blown off course.
Ultra-light Aircraft	Ultra-lights routinely operate at much lower altitudes than standard General Aviation (GA) aircraft. Transmission lines—specifically the thin, hard-to-see earth/shield wires at the highest point of the towers—are a leading cause of fatal wire strikes in low-level aviation. This specific risk profile has not been addressed in the AIA.

Recommendation for Action

The current Aviation Impact Assessment is deficient and fails to address the holistic aviation safety landscape of the New England REZ.

> POSITION SOUGHT

We reject the current Aviation Impact Assessment as incomplete. The proponent must be compelled to issue a Supplementary EIS that specifically models, assesses, and provides mitigation strategies for the impacts of the infrastructure on hot air ballooning, gliding, hang gliding, paragliding, parachuting, ultra-light aircraft, and drone/model aircraft operations.

8 | Construction-phase aviation impacts

8.1 Construction activity and low-level flying

Mitigation of impacts during construction

Given the height of construction and machinery participating in construction including cranes and helicopters the risk to low level flying is considerable. Risk is exacerbated by the movement inherent in the construction process. Mitigation measures listed in the NERNIP EIS are insufficient

8.2 Post-construction notification and operational information

Mitigation of impacts after construction

Given the impediment that the NERNIP poses to low level flying, mitigations listed in Table 12, page 79 and 80 of Technical report 11 – Aviation are insufficient. In both AS2 and AS3 the list of authorities to notify are inadequate.

9 | Consultation evidence from affected landholders and operators

The survey and interviews below provide direct evidence of how aerial agriculture and aviation are used in the affected area, and of the level of consultation reported by respondents.

Survey Analysis

A survey of affected landholders was conducted to support this section of the submission in response to the NERNIP EIS. In the limited time frame available 26 responses were received.

- 88% of respondents have their property transected by the NERNIP
- The remaining 12% are within 3km of the NERNIP
- 3 responding landholders, with multiple properties, also had property further than the 3km radius
- 69% of respondents have an uncertified aerodrome on their property
- Of the respondents that do not have an airstrip – all but 1 makes use of a neighbouring strip.

- The respondent who doesn't use an airstrip makes considerable use of drone services which will be severely impacted due to the alignment of the NERNIP through their property
- 100% of respondents fertilise by air
- 65% also make use of aerial agriculture to disperse seed and control weeds
- 58% use aerial services for pest management
- 3 airstrips have been used for emergency landings
- 1 airstrip was used during the 2019-20 bushfire fighting
- Only 40% of respondents could identify their air strips on the maps published in the NERNIP
- Only 2 respondents indicated that they had communicated with Energy Co with regards to their airstrips. In both circumstances they initiated the communication and Energy Co failed to engage in open discussion with regards to avoiding their airstrips
- Remaining respondents stated that they had received no contact from energy co regarding aerial agriculture

Interviews with aerial service providers and private pilots tabling their concerns

In compiling this response, a number of aerial services and private pilots of fixed wing, helicopter and drone aircraft were interviewed. 7 fixed wing, 3 drone and 3 helicopter operators shared their thoughts.

- All declared concern with safety issues with some stating that beacons and other visual aids should be installed.
- All private pilots expressed concern with visibility, especially of the lines and to a lesser extent the towers in renowned Great Dividing Range weather and that CASA regulations do not do enough to protect them
- All private pilots were concerned that aero clubs, aviation tourism and aerial sports had not been considered
- Most private pilots wanted to be able to receive updates with regards to obstacles to flight throughout the construction phase
- One Walcha Aero Club member mentioned the use of the Walcha Aerodrome by military aircraft and that no mention is made of this in the NERNIP EIS
- Another raised that Heathcote Aerodrome is listed for pilots as an emergency airstrip and that this hasn't been addressed by the NERNIP EIS
- One service provider declared significant concern at the proximity of some uncertified aerodromes to the NERNIP in that no pilot would ever expect lines to be so close to air strips. That line strikes are the leading cause of death for aerial spreader pilots and that this will compound that statistic.
- Drone operators were so incensed by the lack of consideration given to them that they provided their own objections and requests to this submission
- An aviation enthusiast also submitted an additional submission.

10 | Cumulative impacts

Cumulative impacts have been insufficiently assessed in the NERNIP EIS. While the EIS lists the current projects and those sitting with state planning, they have not acknowledged that this project is being designed to cater to the NSW government objective of 6 GW of transmission capacity from the New England REZ, in stage 1. Cumulative impacts should thus reflect this overall objective.

Deficiencies

The EIS does not establish a reliable baseline of agricultural, private, recreational and RPAS aviation activity across the project area.

The consultation described in the EIS is not commensurate with the number of uncertified aerodromes, the diversity of aerial service providers or the number of neighbouring properties that rely on aerial access.

The agricultural assessment does not adequately assess the economic and operational consequences of lost or less efficient aerial application, particularly where ground access is unsafe, impractical or unavailable.

Technical Report 11 does not adequately assess agricultural drone operations, including the regulatory framework, easement restrictions, EMF and navigation risks, and interaction with manned low-level aviation.

The treatment of wire-strike risk, charting, obstacle marking and construction-phase notification is not sufficient for a corridor introducing new large obstacles into established low-level flying areas.

Mitigation and compensation remain insufficiently developed. Airstrip relocation or adjustment, marking, alternative operating arrangements, construction stand-down procedures, compensation and liability arrangements require defined plans, costs and responsibilities before determination.

> POSITION SOUGHT

- Assess the consequences of any prohibition or restriction on drone operations within or near the easement, including lost treatable area, additional operating costs and compensation mechanisms.
- Assess each airstrip proposed for relocation, realignment or restricted use in consultation with its owner, operators and neighbouring users, including the effect of relocation on manned and unmanned aviation and on associated farm infrastructure.
- Provide detailed plans and costings for airstrip relocation or adjustment, obstacle marking, warning systems and other aviation mitigation. Where mitigation cannot preserve existing use, provide a transparent and enforceable compensation framework for affected landholders and service providers.
- Provide final tower coordinates, heights and conductor sag information directly to relevant local operators in usable GIS form, and establish marking requirements for lines near aerial application areas and uncertified aerodromes rather than relying only on general charting.
- Develop construction-phase aviation controls covering cranes, helicopters, temporary obstacles, changing work fronts and notification to local operators, including procedures for stand-down or right-of-way where construction would conflict with lawful aerial agricultural operations.
- Assess Walcha Aerodrome, Heathcote and other relevant registered, uncertified or emergency landing facilities that may be affected even where they fall just outside arbitrary search distances.
- Reassess cumulative aviation impacts having regard to the broader build-out enabled by the transmission project, including the combined effect of additional transmission, generation and associated infrastructure on low-level agricultural and private aviation.
- Publish the completed reassessment and any materially revised mitigation for public scrutiny before determination. Matters central to aviation safety, agricultural access and economic impact should not be deferred to post-approval management plans.

> POSITION SOUGHT

Before the application is determined, EnergyCo should be required to address the following matters with published evidence, defined responsibilities and, where relevant, plans and costings:

1	Undertake and publish comprehensive consultation with affected landholders, neighbouring users of uncertified aerodromes, fixed-wing and helicopter aerial application providers, agricultural RPAS operators, private pilots, aero clubs and other affected aviation groups.
2	Identify and map all uncertified aerodromes and relevant associated infrastructure within the affected area, provide coordinates and high-quality property-level mapping, and reconcile inconsistencies between Technical Reports 6 and 11.
3	Reassess aerial agriculture using the actual agricultural practices of each affected region, including fertiliser spreading, spraying, seed dispersal, pest management and current commercial drone use, and quantify impacts on production, efficiency and treatable land.
4	Extend the aviation regulatory assessment to CASR Part 101 and its Manual of Standards, and to Part 137 where relevant, and provide specific mitigation for agricultural RPAS operations.
5	Provide project-specific analysis of electric and magnetic fields and other interference relevant to RPAS navigation and control, together with final design information needed by operators to establish evidence-based operating limits.
6	Assess the consequences of any prohibition or restriction on drone operations within or near the easement, including lost treatable area, additional operating costs and compensation mechanisms.
7	Assess each airstrip proposed for relocation, realignment or restricted use in consultation with its owner, operators and neighbouring users, including the effect of relocation on manned and unmanned aviation and on associated farm infrastructure.
8	Provide detailed plans and costings for airstrip relocation or adjustment, obstacle marking, warning systems and other aviation mitigation. Where mitigation cannot preserve existing use, provide a transparent and enforceable compensation framework for affected landholders and service providers.
9	Provide final tower coordinates, heights and conductor sag information directly to relevant local operators in usable GIS form, and establish marking requirements for lines near aerial application areas and uncertified aerodromes rather than relying only on general charting.
10	Develop construction-phase aviation controls covering cranes, helicopters, temporary obstacles, changing work fronts and notification to local operators, including procedures for stand-down or right-of-way where construction would conflict with lawful aerial agricultural operations.

11	Assess Walcha Aerodrome, Heathcote and other relevant registered, uncertified or emergency landing facilities that may be affected even where they fall just outside arbitrary search distances.
12	Reassess cumulative aviation impacts having regard to the broader build-out enabled by the transmission project, including the combined effect of additional transmission, generation and associated infrastructure on low-level agricultural and private aviation.
13	Publish the completed reassessment and any materially revised mitigation for public scrutiny before determination. Matters central to aviation safety, agricultural access and economic impact should not be deferred to post-approval management plans.

SECTION 7

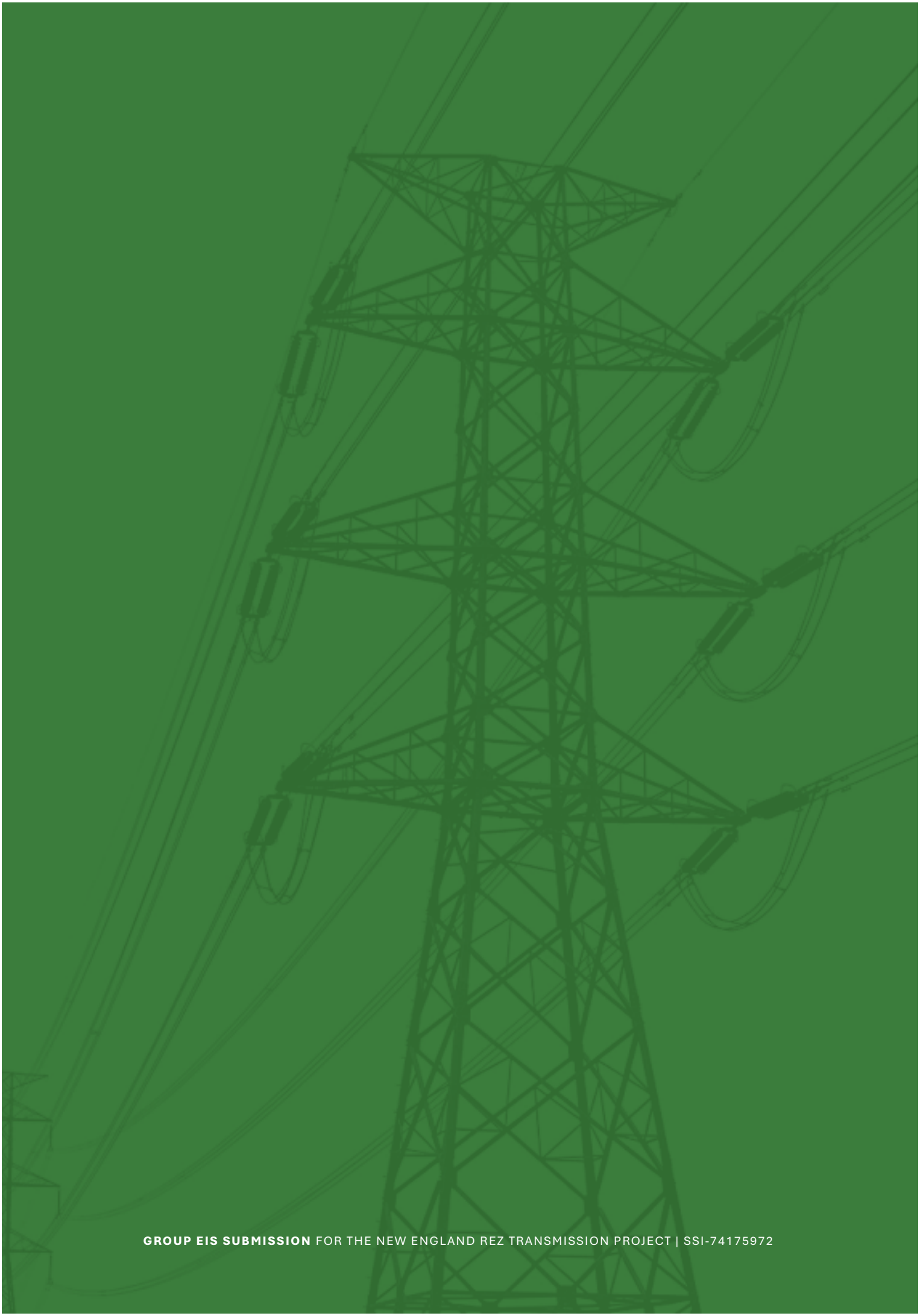
Forestry

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha



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SECTION 7

Forestry

Key issues we have found ...

Forest impacts are being understated	Economic assessment reduces forest losses to timber revenue, overlooking habitat, recreation, access, firefighting and permanent management costs for public forests.
Forest footprints remain unreconciled	Different chapters present different forest disturbance figures, without clearly reconciling clearing, operational restrictions and the extent of affected public land.
Sensitive forest zones face clearing	The proposed route clears special management and harvesting exclusion areas, without demonstrating why the earlier avoidance objective was not achieved.
Native habitat faces permanent fragmentation	A proposed 140 metre gap through connected native forest threatens wildlife movement, while effective crossing measures remain undefined before approval.
Firefighting access must be protected	Transmission lines, steep terrain and access barriers could constrain firefighting, yet a forest specific suppression strategy has not been demonstrated.
Forest management cannot be deferred	Access controls, road closures, vegetation waste and pest management remain unresolved, creating lasting responsibilities for Forestry Corporation and neighbouring landholders.

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

Read in more detail >



SECTION 7

Forestry

Does the EIS adequately assess the consequences of placing a permanent 500 kV transmission easement through Nundle State Forest and other State forest land, including impacts on forest management, biodiversity, fire response, access, recreation and forestry operations?

EXECUTIVE SUMMARY

The New England REZ Network Infrastructure Project would create a substantial and permanent disturbance through Nundle State Forest. The EIS identifies approximately 160.5 hectares of State forest directly affected by construction, including about 160 hectares in Nundle State Forest, with a larger operational area of approximately 164.5 hectares treated as unavailable for forestry activities. The proposed corridor also affects small areas of Terrible Billy and Hanging Rock State Forests. [1]

The impact cannot be reduced to the value of timber foregone. Nundle State Forest is a working forest, but it also contains areas managed for environmental, cultural and other non-timber values, provides connected native habitat, supports recreation and authorised hunting, and is part of the landscape used for bushfire suppression. The EIS itself identifies the Nundle section as having high existing habitat connectivity and predicts a high connectivity impact because the dual 500 kV lines would create a gap approximately 140 metres wide. [2]

The forestry assessment is also internally inconsistent. Section 12 reports approximately 160.5 hectares of State forest directly affected. The economic chapter assesses 100.4 hectares of production native forest and 62.6 hectares of softwood plantation. The Social Impact Assessment refers to disturbance of only “up to 52 ha” of Nundle State Forest. These figures may reflect different assessment boundaries or land-use classifications, but the EIS does not present a single, clear reconciliation that allows the public or decision-maker to understand the actual forest area to be cleared, restricted or permanently altered. [1, 3, 4]

There is a further concern about route development. During corridor refinement in October 2025, EnergyCo advised Forestry Corporation that it was investigating a route through Nundle State Forest that avoided Forestry Management Zone 2 and Zone 3A land. The exhibited EIS now identifies clearing of approximately 4 hectares of Zone 2 Special Management Zone and 5 hectares of Zone 3A Harvesting Exclusion Zone. The EIS should explain why that earlier avoidance objective was not achieved and what alternatives were considered before accepting impacts to these areas. [5]

The EIS leaves important forestry-specific matters to later consultation and management: detailed construction methodologies, access controls, treatment of merchantable timber, vegetation waste, fauna connectivity structures, weed-contaminated material and operational access. These are not minor implementation details where they determine clearing, fire response, biosecurity, public access and the long-term management of the forest. The Department should require these matters to be resolved and assessed before determination.

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Deficiencies 8

1 | Scale and nature of the State forest impact

The EIS Land chapter states that construction, including easement clearing, would directly impact approximately 160.5 hectares of State forest: approximately 160 hectares of Nundle State Forest, 0.1 hectares of Terrible Billy State Forest and 0.4 hectares of Hanging Rock State Forest. The project area itself intersects a larger area of Nundle State Forest—about 289 hectares—before the disturbance footprint is applied. [1]

Within Nundle State Forest, the EIS assigns the approximately 160 hectares of clearing to Forestry Corporation management zones as follows. [1]

Forestry Management Zone	EIS description	Approx. clearing
Zone 2 – Special Management	Selective or low-impact forestry while protecting identified environmental or cultural values	4 ha
Zone 3A – Harvesting Exclusion	Harvesting excluded due to identified environmental, cultural, operational or other constraints	5 ha
Zone 4 – General Management	State forest managed for a range of forest uses and values; timber production is not the primary objective	78 ha
Zone 5 – Hardwood Plantation	Commercial hardwood plantation forestry	0.01 ha
Zone 6 – Softwood Plantation	Commercial softwood plantation forestry, typically pine	73 ha

This breakdown is important because almost half of the Nundle clearing is not softwood plantation. The project would clear substantial native forest in Zone 4 and would also disturb Zone 2 and Zone 3A land specifically identified for special management or harvesting exclusion. Describing the forest impact primarily as a small regional loss of timber production understates the nature of the land being affected.

The SEARs expressly required an assessment of impacts on Crown lands including State Forests, and separately required an assessment of the economic impacts to State Forests. Those are different requirements. An economic estimate of timber revenue does not discharge the broader obligation to assess impacts on the State forest estate and its environmental, operational and community values. [6]

2 | The EIS does not present one consistent forestry footprint

The EIS uses materially different forestry areas in different chapters and technical reports:

- Section 12 Land: approximately 160.5 ha of State forest directly impacted by construction, including about 160 ha in Nundle State Forest. [1]
- Section 15 Economic: approximately 100.4 ha of production native forest and 62.6 ha of softwood plantation affected during construction and operation. [3]
- Social Impact Assessment: Nundle State Forest described as disturbed by "up to 52 ha", with different figures also stated for Terrible Billy and Hanging Rock State Forests. [4]

The BDAR describes approximately 160 ha of subject land within Nundle State Forest and records about 5.5 ha subject to harvesting exclusion. [2]

Some difference can be explained by the use of different concepts—project area, disturbance footprint, production forestry land and operational easement. However, the EIS does not provide a single reconciled table or map showing how these figures relate spatially. The discrepancy is too large to leave the reader to infer the explanation.

The Department should require a single forestry impact schedule and map distinguishing: project area; construction disturbance; permanent operational easement; actual vegetation clearing; vegetation retained beneath conductors; each Forestry Management Zone; plantation versus native forest; roads and tracks; and areas temporarily unavailable during construction. The same schedule should be used consistently across the Land, Biodiversity, Social, Economic, Bushfire and Transport assessments.

3 | Avoidance of special-management and harvesting-exclusion areas has not been demonstrated

In October 2025 EnergyCo advised Forestry Corporation that, although the revised corridor would cross approximately 11 km of Nundle State Forest, it was investigating a corridor that avoided Zone 2 Special Management and Zone 3A Harvesting Exclusion land. The exhibited EIS now identifies approximately 4 ha of Zone 2 and 5 ha of Zone 3A clearing. [5]

That change needs a clear explanation. Zone 2 and Zone 3A designations exist because particular environmental, cultural, operational or other constraints have already been recognised in forest management. The EIS should identify the precise values or constraints associated with every affected Zone 2 and Zone 3A area, map them, explain why avoidance was not achieved, and demonstrate the alternatives considered before accepting the impact.

The SEARs require the EIS to demonstrate the application of the avoid, minimise and offset framework for biodiversity impacts, and to assess impacts on Crown land including State Forests. A route refinement that moved from stated avoidance of these management zones to direct clearing requires transparent justification. [6]

4 | Nundle State Forest is a major habitat-connectivity corridor

The biodiversity assessment gives the Nundle section particular significance. For the Forest Way, Niangala to Forest Way, Hanging Rock section, which includes Nundle State Forest, the BDAR describes existing habitat connectivity as "High". It states that 7.7 km of the 12.7 km section traverses good-condition, intact native vegetation, mostly within the General Management Zone, connected to extensive native vegetation in nearby State forests and nature reserves. [2]

The BDAR also rates the project's connectivity impact in this section as "High". It states that the dual 500 kV lines would create a 140 m wide gap and that the terrain and vegetation density would allow little vegetation retention because almost all trees would encroach the safe operating buffer. Threatened species recorded in this area and potentially affected by connectivity loss include koala, spotted-tailed quoll, southern greater glider, yellow-bellied glider and several woodland birds. [2]

This evidence is important to the forestry assessment because Zone 4 should not be treated as low-value land simply because timber production is not its primary objective. In this location, the EIS itself identifies intact native forest with high connectivity value. The forestry section must therefore be read together with the biodiversity assessment, not reduced to commercial timber hectares.

EnergyCo records consultation with Forestry Corporation about fauna connectivity structures, retention of habitat features and vegetation waste. The EIS should identify the structures proposed, their location, design standard and effectiveness, rather than defer the practical solution until after approval. [2]

5 | The economic forestry assessment is too narrow

Section 15 estimates forestry impacts by applying statewide average revenue rates to approximately 100.4 ha of production native forest and 62.6 ha of softwood plantation. It estimates foregone forestry revenue of about $74,844 per year and concludes the impact is immaterial at the regional scale. [3]

That calculation may be relevant to direct timber output, but it is not an adequate assessment of the project's impact on State Forests. It does not value or resolve:

- loss and fragmentation of connected native forest habitat;
- impacts on land already subject to special management or harvesting exclusion;
- changes to long-term forest access, road networks and harvesting patterns;
- firefighting constraints created by transmission infrastructure and access controls;
- weed and biosecurity risks from large-scale clearing and vehicle movement;
- recreation, hunting and pest-management effects; or
- ongoing management costs imposed on Forestry Corporation by the presence of a permanent high-voltage easement.

The conclusion that the forestry impact is "immaterial" at a regional or State scale should not be allowed to stand as a proxy for the planning significance of the impact at Nundle State Forest. A localised impact can be significant even where its contribution to statewide forestry revenue is small.

6 | Bushfire risk and aerial firefighting within the forest

The forestry notes raise a practical concern that requires much more explicit treatment: the proposed lines cross steep, heavily forested country with a history of large, high-intensity fires. Forest fires can produce very high fire intensities and flame lengths under adverse conditions, while steep gullies and limited ground access can make aerial suppression particularly important.

The SEARs require the project to assess public-safety and bushfire risks, describe vegetation management within the easement, and assess impacts on aerial fire control. [6] The forestry-specific question is not only whether the transmission line can survive a fire, but how the line and its easement alter the ability of Forestry Corporation, RFS and other agencies to fight fire in and around Nundle State Forest.

The EIS proposes that forest cover may be retained in some lower parts of deeper gullies where conductor clearance permits. Retained vegetation may assist ecological connectivity, but it also means the operational fire environment beneath the lines must be understood. Conversely, complete clearing of a wide easement may create new access, ignition and human-use risks. The EIS must assess both sides of this management problem.

EnergyCo should identify the sections where transmission infrastructure will constrain fixed-wing or helicopter firefighting, how those constraints overlap with terrain where ground attack is difficult, and what alternative suppression strategy has been agreed with FCNSW and RFS. It should also demonstrate that gates or barriers proposed for access control will not delay emergency entry or evacuation.

7 | Easement access, illegal use and ignition risk

A permanent cleared utility corridor through public forest can change how people access and use the land. The forestry advice identifies the practical risk of rubbish dumping, illegal trail-bike use, damaging four-wheel-drive access and additional bushfire ignition points along utility easements.

These are foreseeable operational impacts. If EnergyCo proposes fencing, gates, bollards or other barriers, the EIS should show their locations and explain who controls them, how authorised forestry and emergency access is maintained, how public access is managed, and who is responsible for maintenance and enforcement over the life of the project.

This cannot be resolved by a generic statement that access will be managed in consultation with Forestry Corporation. Access controls can themselves have environmental and emergency-management consequences. The Department should see the proposed access-control strategy before determination.

8 | Vegetation waste, weeds and biosecurity

Clearing through approximately 160 hectares of Nundle State Forest will generate a large volume of vegetation. The EIS states that merchantable timber within the disturbance footprint is assumed to be lost during construction, while discussions with Forestry Corporation would consider opportunities for commercial harvesting. [1] The biodiversity consultation record also identifies vegetation-waste management as an issue discussed with Forestry Corporation. [2]

The residual material may include weed-contaminated vegetation and soil. The EIS needs to identify what weeds are present in the affected forest areas, how contaminated material will be segregated, the lawful destination or treatment method, and the vehicle-cleaning and hygiene controls applying to machinery moving between work fronts.

If weed-contaminated waste must be taken to a licensed facility, that facility and its acceptance capacity should be identified before approval. Otherwise the assumed waste pathway is not demonstrated. The same applies to large volumes of clean woody biomass: proposed reuse, mulching, chipping, burning, stockpiling or transport off site should be quantified and assessed for fire, traffic and biosecurity consequences.

9 | Roads, construction access and closures within State Forests

State forest roads serve more than Forestry Corporation operations. They are used for fire management, recreation, authorised hunting and access through the forest. Construction traffic, road upgrades, stringing activities and temporary closures can therefore affect multiple users.

The EIS should provide a forest-specific access and traffic plan showing which existing FCNSW roads are used, which are upgraded or widened, which new tracks are created, the duration and timing of closures, alternative access routes, and the notice to be given to Forestry Corporation, local residents, businesses and forest users. The plan should distinguish short-duration stringing exclusions from prolonged construction access restrictions.

Where roads are altered for project use, EnergyCo should identify the required standard at handback and who bears the cost of long-term maintenance or rectification. Roads designed for forestry operations should not be left carrying additional drainage, erosion or maintenance liabilities created by transmission construction.

10 | Recreation, authorised hunting and pest management

The EIS acknowledges that Nundle State Forest is used for recreation, including bushwalking and authorised hunting, and identifies Ponderosa Park as a public recreation facility. [1, 4] The project does not directly cross the main picnic area, but the relevant issue is broader than the picnic ground.

Authorised hunting contributes to control of deer, pigs and other pest animals in State forests. Extended closures or exclusion areas during a multi-year construction program may reduce hunter access and displace pest animals onto neighbouring private land. The EIS should assess the duration and spatial extent of hunting restrictions and consult with Forestry Corporation about likely pest-management consequences.

Where project restrictions materially increase pest-management pressure on adjoining landholders or require additional control programs, responsibility for those costs should be identified. Recreational access impacts should also be communicated in advance with clear closure periods and alternative access arrangements.

11 | Long-term forest management consequences

The transmission corridor is not a temporary construction disturbance. The operational easement is a permanent land-management change. Section 12 states that approximately 164.5 hectares of State forest land would indicatively be affected by the operational area and assessed as unavailable for forestry activities, even though not all vegetation within the easement would necessarily be cleared. [1]

The project will therefore create a new permanent interface between electricity infrastructure and a working public forest. The EIS should show how harvesting, replanting, road maintenance, prescribed burning, wildfire response, pest control, recreation and biodiversity management can continue safely around the infrastructure for its operating life.

These arrangements need to be expressed as enforceable project commitments, not simply matters for future consultation between the Network Operator and Forestry Corporation. The planning decision should define the outcomes to be maintained after the project is transferred to its long-term operator.

Deficiencies

The EIS identifies a substantial State forest impact but does not provide a coherent forestry assessment that brings together land use, biodiversity, bushfire, traffic, waste, recreation and long-term forest management. The principal deficiencies are:

- no single reconciled forestry footprint across the Land, Economic, Biodiversity and Social assessments;
- no clear explanation for the change from the earlier stated intention to avoid Zone 2 and Zone 3A land to an EIS design that clears both;
- insufficient recognition of the high habitat-connectivity value of the native-forest section through Nundle State Forest;
- an economic assessment focused narrowly on statewide timber revenue rather than the full suite of forest values and management costs;
- no sufficiently detailed forest-specific bushfire and aerial firefighting strategy;
- access-control measures, emergency access and responsibility for illegal use left unresolved;
- vegetation waste, weed-contaminated material and disposal pathways not demonstrated at the level required for a project of this scale;
- insufficient detail on State forest road use, closures, notification and handback; and
- recreation, hunting and pest-management consequences not adequately assessed.

These matters are relevant to the impacts the Minister is being asked to approve. They should be resolved before determination rather than deferred to detailed design, contractor methodology or later consultation with Forestry Corporation.

> POSITION SOUGHT

The Department and Planning Minister should not determine the application until EnergyCo has provided a reconciled and forestry-specific assessment addressing the following matters. General assurances that details will be resolved with Forestry Corporation during detailed design are not sufficient.

Reconcile the forestry footprint

Provide one map and schedule reconciling the project area, disturbance footprint, clearing footprint and operational easement across every affected State forest. Show Forestry Management Zones, native forest, plantations, retained vegetation, access tracks and road works. Explain the 160.5 ha, 163 ha and 52 ha figures used in different parts of the EIS.

Explain why Zone 2 and Zone 3A are now being cleared

Identify the values and constraints associated with each affected Zone 2 and Zone 3A area, explain why the October 2025 avoidance objective was not achieved, and demonstrate the route and design alternatives considered to avoid these areas.

Demonstrate how habitat connectivity will be maintained

Map the high-connectivity forest corridor and identify the final clearing width and vegetation-retention areas. Provide the location and design of fauna connectivity measures and demonstrate their likely effectiveness for the threatened species identified by the BDAR.

Provide a forest-specific bushfire and aerial firefighting plan

Identify where the transmission line restricts aerial attack, where ground access is limited, how retained vegetation beneath lines will be managed, and what alternative suppression arrangements have been agreed with FCNSW and RFS. Demonstrate that gates and barriers will not delay emergency response.

Resolve long-term access control

Show proposed gates, fences, barriers and access points. Identify who controls and maintains them and how dumping, illegal vehicle use and ignition risks will be managed while preserving forestry, firefighting and authorised public access.

Provide a vegetation and weed-waste plan

Quantify merchantable timber and residual vegetation by type. Identify weeds and contaminated areas, machinery hygiene controls, treatment and reuse methods, licensed receiving facilities and available capacity. Assess haulage and fire risk associated with stockpiles or off-site disposal.

Provide a State forest road and closure plan

Identify every FCNSW road and track affected, the upgrades proposed, closure periods, alternative access, notification requirements and handback standards. Assess effects on fire operations, recreation, hunting, neighbouring residents and local businesses.

Assess recreation, hunting and pest-management impacts

Define the duration and area of public and hunting restrictions and assess whether reduced access will increase deer, pig or other pest pressure on the forest and adjoining properties. Identify responsibility for additional pest-control measures where required.

Assess the full long-term cost to forest management

Do not limit the assessment to foregone timber revenue. Identify additional FCNSW management, access, road, fire, biosecurity and operational costs caused by the permanent easement and establish how those costs will be met over the life of the project.

Make forestry commitments enforceable

Translate the agreed FCNSW arrangements into measurable project commitments and, where appropriate, conditions of approval. Matters necessary to establish the scale or acceptability of the impact must be resolved before determination, not left to the future Network Operator or contractor.

If EnergyCo cannot demonstrate that the permanent transmission easement can be constructed and operated through Nundle State Forest without unacceptable impacts on forest values, fire management and long-term forest operations, the route through the State forest should be reconsidered before approval.

Source references

[1] EnergyCo, New England REZ Network Infrastructure Project EIS, Section 12 Land, particularly sections 12.2.6.1, 12.3.5.1 and 12.4.5.1 (State forests).

[2] EnergyCo, Technical Report 1 – Biodiversity Development Assessment Report, particularly consultation with Forestry Corporation, habitat-connectivity assessment around Nundle State Forest, and section 8.4.2 State Forests.

[3] EnergyCo, New England REZ Network Infrastructure Project EIS, Section 15 Economic, sections 15.2.3 and 15.3.3 Forestry.

[4] EnergyCo, Technical Report 4 – Social Impact Assessment, discussion of Nundle, Terrible Billy and Hanging Rock State Forests and recreational use.

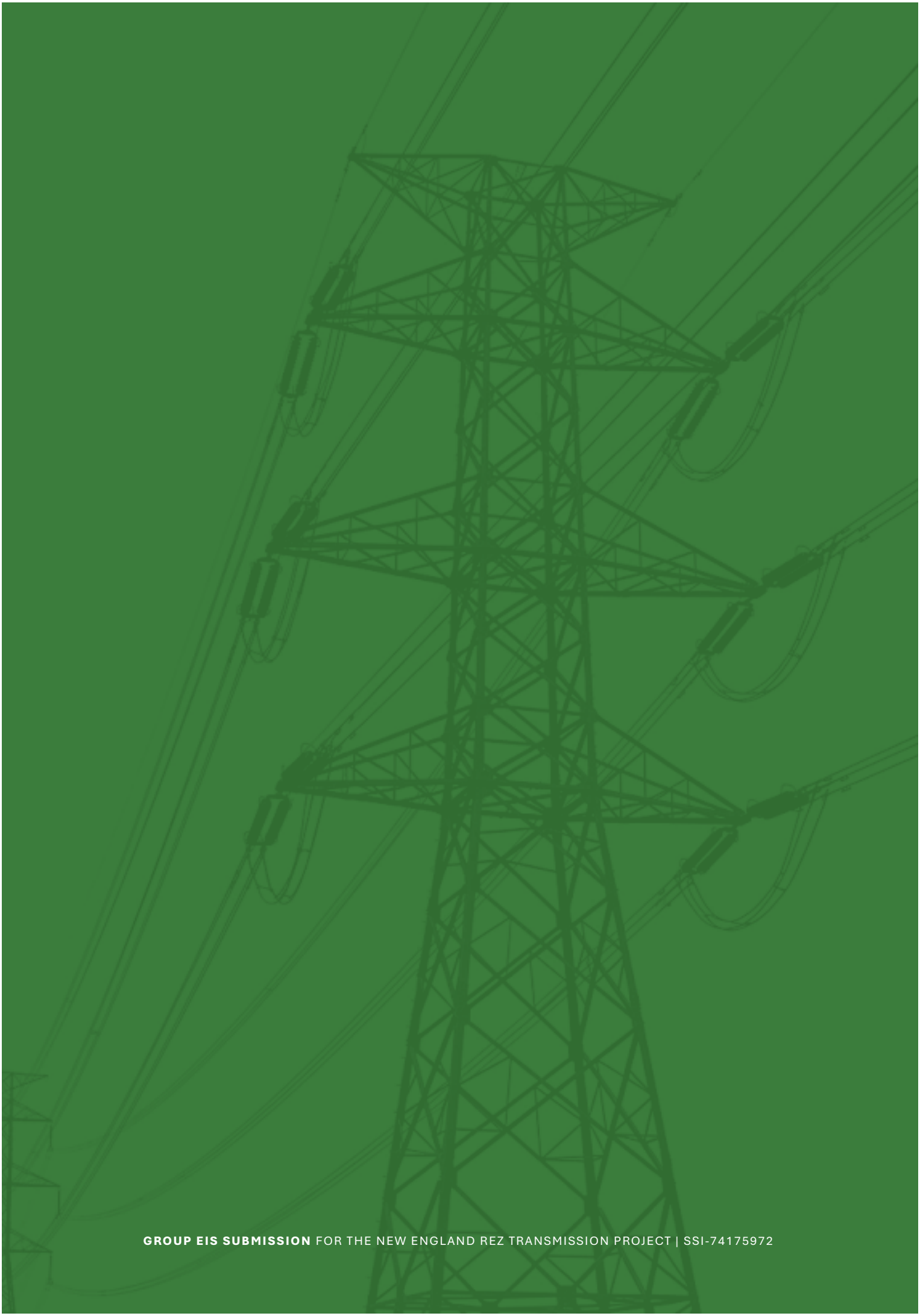
[5] EnergyCo correspondence to Forestry Corporation NSW, 2 October 2025, New England REZ corridor update, stating the investigation of a corridor avoiding Forestry Management Zones 2 and 3A within Nundle State Forest.

[6] NSW Department of Planning, Housing and Infrastructure, Planning Secretary's Environmental Assessment Requirements for SSI-74175972, 7 April 2026, including Biodiversity, Land, Hazards, Economic and Engagement requirements.

SECTION 8

Water Supply, Water Security and Water-Related Environmental Impacts

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 8

Water Supply, Water Security and Water-Related Environmental Impacts

Key issues we have found ...



Water supply remains unproven

The EIS estimates 2,400 ML of construction water, but reliable sources, supplier commitments and delivery arrangements have not been demonstrated.



Existing bore supplies need protection

Potential production bores remain unidentified, leaving sustainable yields, drawdown and effects on neighbouring farm supplies and dependent ecosystems insufficiently assessed.



Drought increases demand and uncertainty

Drought increases demand and uncertainty Dust suppression needs can rise as supplies decline, yet construction demand and reliable water availability remain inadequately tested against drought.



Regional demand lacks supply evidence

Regional forecasts quantify construction demand while excluding actual source availability and existing users, leaving competition between projects and communities unresolved.



Camps lack proven water services

Camps lack proven water services. Waverley Road illustrates unresolved camp water sources, drought contingencies, tanker deliveries and wastewater capacity, with practical consequences for rural neighbours.



Protect Walcha's drinking water

Construction near Walcha's drinking water offtake requires demonstrated protection against sediment, chemical spills and any competing demands for river water.

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

Read in more detail >





SECTION **8**

Water Supply, Water Security and Water-Related Environmental Impacts

EXECUTIVE SUMMARY

Our community considers that the New England REZ Environmental Impact Statement (EIS) fails to adequately demonstrate how the project's substantial water requirements can be met without unacceptable impacts on existing users and the environment.

EnergyCo estimates **2,400 ML of construction water demand** for the transmission alone, yet has not established where much of this water will come from, whether supplies will be reliable, or the consequences of extraction. These are fundamental questions, particularly in the New England Tablelands, where small catchments, variable fractured-rock aquifers and drought constrain water availability.

Our principal concerns are:

1. **Water supply remains unproven.** EnergyCo has identified possible sources but deferred the detailed supply strategy until after approval, leaving water availability and extraction impacts unresolved.
2. **Walcha faces substantial additional demand.** EnergyCo forecasts 403 ML of construction demand in Walcha LGA in the peak year, averaging 1.1 ML/day—greater than the town's existing daily water demand. While this water may be sourced elsewhere, neither reliable local supply nor the implications of importing water have been demonstrated.
3. **Waverley Rd workers Camp has unresolved water supply concerns** as raised by a landholder account of local water extraction limits, and access constraints.
4. **Groundwater impacts have not been adequately assessed.** Extraction locations, sustainable bore yields and potential effects on neighbouring water users remain unknown. Groundwater quality and treatment remain unresolved. The EIS records arsenic above drinking-water guidelines at several monitoring locations and acknowledges limited data concerning potential connections to existing users. Published groundwater results do not resolve uranium.
5. **Construction water demand appears materially understated.** EnergyCo has not substantiated its low allowances for concrete production, road construction, dust suppression and personnel. Its own assessment acknowledges that dry conditions can increase demand, yet leaves that increase to detailed design.
6. **These quantities must be justified and corrected before approval.Cumulative water availability remains unassessed.** EnergyCo's October 2026 regional demand update estimates construction demand across the REZ but expressly excludes water-source availability and existing community requirements.
7. **Critical assessment is deferred until after approval.** Decisions about water sources and extraction impacts will be made when affected communities have substantially less opportunity to scrutinise or influence them.

Our community asks DPHI to require EnergyCo to demonstrate reliable water supply, assess its impacts and resolve these fundamental deficiencies before determination.

Where acceptable outcomes cannot be demonstrated, the project must be modified accordingly. Future management plans cannot substitute for the evidence required to establish that the project is environmentally acceptable.

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Part 1
Failure to adequately address SEARs and agency assessment requirements

1 | Community Comment

Our community considers that EnergyCo's Environmental Impact Statement (EIS) has failed to provide sufficient information to demonstrate that the New England REZ Network Infrastructure Project can be constructed without unacceptable impacts on existing water users, regional water resources and the environment.

The shortcomings are not minor omissions. They concern fundamental questions about the project's construction requirements, the sources from which water will be obtained, the reliability of those sources, and the consequences for affected communities.

These are precisely the matters the Planning Secretary's Environmental Assessment Requirements (SEARs), issued on 7 April 2026, required EnergyCo to address.

EnergyCo has produced extensive technical reports, identified possible water sources, calculated construction water requirements and proposed numerous mitigation measures. However, the existence of these reports does not establish that the assessment requirements have been adequately satisfied.

The fundamental problem is that EnergyCo has assessed the demand for water without establishing how that demand will be met, and has reached conclusions about acceptable impacts without knowing where much of the water will be extracted.

This is not just about meeting the SEARs requirement with respect to impacts on the water resource in the area, it is also about the lack of analysis that is required to ensure the project can be built. All parties, including the NSW government, have a stake in this process being completed properly, prior to determination.

The EIS estimates 2,400 ML of water for construction of the transmission project. It then identifies a menu of possible supplies, including surface water, groundwater, harvested runoff, wastewater reuse, council supplies and commercial vendors.

Yet the detailed Water Supply Strategy will not be developed until detailed design – post determination.

This approach reverses the proper sequence of environmental assessment.

EnergyCo is seeking approval of a major infrastructure project before establishing the feasibility and environmental consequences of supplying one of its essential construction resources.

The consequences are particularly serious for the New England Tablelands, where water availability is constrained by small headwater catchments, variable fractured-rock aquifers, agricultural demand and prolonged drought.

The October 2026 regional water-demand update further demonstrates the scale of the challenge, with an estimated 1,566 ML required for projects located within Walcha LGA between 2027 and 2035. However, that report expressly excludes an assessment of actual water-source availability.

Our community submits that EnergyCo has not adequately demonstrated compliance with several material water-related assessment requirements, particularly those concerning supply arrangements, groundwater impacts and wastewater disposal.

We request that DPHI require these deficiencies to be resolved before determination, including further public assessment of material new information.

2 | What the SEARs required EnergyCo to do

The revised SEARs, issued by DPHI on 7 April 2026, establish the specific matters that EnergyCo's EIS must address.

Under Water and Soils, the SEARs require:

- Assessment of impacts on the quantity and quality of regional surface water and, where relevant, drinking water resources.
- Details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation, including consultation with suppliers.
- Assessment of impacts on groundwater aquifers and groundwater-dependent ecosystems, having regard to the NSW Aquifer Interference Policy and relevant Water Sharing Plans.
- Assessment of flooding impacts and risks.
- Identification and assessment of impacts associated with waterfront land.
- Description of erosion and sediment-control measures.

> Source: DPHI, Planning Secretary's Environmental Assessment Requirements, SSI-74175972, 7 April 2026, p. 3. Amended SEARs.pdf

The SEARs also require an assessment of likely environmental impacts, including cumulative impacts, measures to avoid or minimise impacts and actions proposed to address uncertainties.

> Source: Amended SEARs, pp. 1–2. Amended SEARs.pdf

These requirements are not satisfied merely by naming the relevant environmental risks or promising to investigate them later.

An assessment should provide sufficient information for the decision-maker to understand the likely impacts and determine whether those impacts are acceptable.

It should also give affected communities a meaningful opportunity to examine the assumptions and evidence upon which EnergyCo's conclusions rely.

Where essential information remains unavailable, it is legitimate to question whether the EIS has fulfilled the purpose of the assessment requirements.

3. Failure to establish construction water supply arrangements

The most significant deficiency concerns the requirement to provide details of water supply arrangements.

The SEARs expressly require:

> *"details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation (including consultation with suppliers)"*

Source: Amended SEARs, p. 3. Amended SEARs.pdf

EnergyCo estimates that construction of the transmission project will require approximately 2,400 ML of water, comprising 360 ML potable and 2,040 ML non-potable water.

The EIS identifies potential sources and discusses preliminary engagement with councils, WaterNSW, DCCEEW, AGL and commercial water suppliers.

It also identifies the possibility of obtaining water from existing licence holders through commercial arrangements.

However, EnergyCo has not demonstrated a complete, reliable water supply strategy.

The EIS does not establish which sources will supply the required quantities, where extraction will occur, which suppliers have committed water, or what physical infrastructure will be required to deliver the water to construction sites.

Instead, Section 18.3.6.1 states that a detailed water supply strategy will be developed as the project progresses and design details are refined.

Mitigation measure SW8 confirms that the detailed strategy will be prepared during detailed design.

> Source: EIS Section 18, pp. 695–696 and 704–705. Section 18 - Surface water and flooding (PDF) (1).pdf

This is not an adequate substitute for demonstrating supply arrangements in the EIS.

A list of possible sources is not a water supply strategy. Discussions with potential suppliers are not evidence of committed supply. The existence of water entitlements is not proof that water will be physically available when required.

EnergyCo's assessment leaves unresolved the very matters that determine whether water can be obtained without unacceptable impacts.

The deficiency is particularly serious because the location and nature of water extraction directly affect the environmental assessment. Without identifying extraction locations, it is impossible to fully determine which watercourses, aquifers, agricultural enterprises or existing users may be affected. Nor can the associated impacts of water transport, pipelines, pumping infrastructure and storage be confidently established.

We note that the Water Technical report does contain chemical analysis of the bores on pages 234 – 237. We also note that the Water Technical Report, on pages 226 – 232, contains Bore Data, such as Drilled Date, Latitude and Longitude location, Bore Depth, Water Sharing Plan and bore Purpose**. However, it does not record the measured bore yields.** Of all the information that is critical to informing the applicant or the planning department on whether water is available in sufficient quantities to build the REZ – this information is critical, it is easy to obtain, yet it is missing.

Energy Co needs to establish, through compiling of publicly available bore data, what the likely yields for ground water bores in the New England REZ may be. More importantly, the report needs to establish what the likelihood of interference with neighbouring bore yields might be. This interaction is a well-known impact between neighbouring fractured rock, small aquifer, bores. The extraction quantities need to be established, and the impacts measured. None of this work has been done.

It is difficult to reconcile this approach that has been taken, with a SEARs requirement specifically calling for details of supply arrangements.

> POSITION SOUGHT

DPHI should require EnergyCo to produce a detailed, source-specific Water Supply Strategy before determination. It must demonstrate physical availability, supplier capacity, reliable quantities, extraction locations, drought performance and the environmental consequences of the proposed arrangements.

Where reliable supply cannot be demonstrated, the project design, construction methodology, staging or scale must be modified accordingly.

4 | Failure to address DCCEEW Water's specific requirements

The inadequacy of EnergyCo's water assessment becomes more apparent when compared with the advice provided by DCCEEW Water on 23 December 2025.

DCCEEW identified 11 water assessment requirements and expressly stated that the transmission project required assessment comparable to that applied to major renewable generation developments.

The agency requested a detailed and consolidated site water balance, identification of water extraction and interference activities, details of water take and supplier confirmation.

It further requested information concerning water licences, existing users, groundwater conditions and environmental impacts.

> Source: DCCEEW Water, Comment on the Secretary's Environmental Assessment Requirements, 23 December 2025, Attachment A, items 1–11. Amended advice - DCCEEW Water.pdf

These are recommendations provided during development of the SEARs.

4.1 No demonstrated consolidated source-and-demand water balance

DCCEEW's first requirement was:

> *"A detailed and consolidated site water balance."*

EnergyCo has calculated construction demand and examined possible regional supply sources. However, the exhibited material does not establish a consolidated balance demonstrating how each component of demand will be met by identified, reliable supplies. A meaningful balance must account for supply availability, extraction restrictions, existing users, seasonal variability, storage, reuse and peak construction requirements. A forecast of demand is only one side of this calculation.

EnergyCo has quantified what it expects to use, but has not demonstrated where sufficient water will come from.

The October 2026 regional water-demand update reinforces this deficiency. It expressly acknowledges that assessment of water supply availability and existing user demand is outside its scope, and that further investigations are necessary.

> POSITION SOUGHT

Require a consolidated water balance identifying proposed sources, reliable supply volumes, peak demand, existing uses and drought constraints before determination.

4.2 Supplier confirmation has not been demonstrated

DCCEEW's third requirement specifically asks for confirmation from alternative suppliers that the appropriate volumes can be obtained. This is a clear and practical requirement.

EnergyCo's consultations and proposed commercial arrangements do not establish that sufficient water has been secured or that suppliers possess reliable capacity. Even if a supplier is willing to provide water, it must be demonstrated that the water is available within applicable extraction limits and can physically be delivered.

Our community questions how DPHI can accept EnergyCo's conclusions about supply impacts while this fundamental evidence remains outstanding.

> POSITION SOUGHT

Require documented confirmation of source capacity and supply arrangements, together with assessment of the impacts of extracting and transporting the water.

4.3 Available entitlements have been confused with reliable physical supply

Technical Report 14 compares predicted construction demand with allocations across relevant Water Sharing Plan areas.

For example, the Macleay catchment assessment identifies 152.8 ML of peak annual non-potable demand against regional allocations of 1,796 ML.

EnergyCo concludes that predicted project requirements are generally a small proportion of available allocations.

> Source: Technical Report 14, Table 4.3, p. 87; EIS Section 18, Table 18.3, p. 698.
Section 18 - Surface water and flooding (PDF) (1).pdf

But the amount allocated across a water-sharing area does not establish the amount available to a particular construction project. The relevant questions are how much water remains available after existing needs, how much entitlement can be acquired, where water can physically be extracted and whether extraction is reliable during drought.

Using broad regional allocations to support conclusions about local water availability risks giving the decision-maker a misleading impression of the security of supply. The problem is not EnergyCo's arithmetic. It is the inference that a regional allocation represents a demonstrated construction water source. It simply does not work that way.

> POSITION SOUGHT

Require EnergyCo to distinguish licensed entitlement, actual utilisation, commercially accessible supply and physically reliable water availability in its assessment.

5 | Groundwater - assessment deferred because essential information is missing

The SEARs require assessment of the project's impacts on groundwater aquifers and groundwater-dependent ecosystems, having regard to the NSW Aquifer Interference Policy and relevant Water Sharing Plans.

The Groundwater Impact Assessment provides extensive regional information concerning groundwater systems, existing registered bores and potentially sensitive environments. However, it acknowledges that future groundwater production sites have not been selected.

Technical Report 16 explains that groundwater modelling to predict impacts from production bores would be required, but is premature because extraction locations and site-specific data are unavailable.

This admission is fundamental.

> The EIS acknowledges that assessment necessary to predict groundwater extraction impacts cannot yet be completed, while simultaneously identifying groundwater as a possible source of construction water.

It is not sufficient to conclude that groundwater impacts will be acceptable simply because pumping tests, monitoring and management plans will be undertaken later. The purpose of those investigations is to establish the likely impacts. Until they are undertaken, the impacts remain uncertain. This is particularly serious in the New England Tablelands, where groundwater predominantly occurs in variable fractured-rock systems.

The EIS identifies 608 registered bores within the groundwater study area and acknowledges the possibility of additional unregistered basic-landholder-rights bores.

> Source: EIS Section 19.2.1–19.2.2, pp. 710–711. Section 19 - Groundwater (PDF).pdf

EnergyCo proposes that pumping tests, groundwater monitoring and assessment of neighbouring bore impacts will occur prior to extraction.

Mitigation GW4 includes possible responses such as reducing pumping, ceasing extraction, deepening or replacing bores.

> Source: EIS Section 19, mitigation GW4, pp. 720–721. Section 19 - Groundwater (PDF).pdf

These provisions may assist in controlling known impacts, but they do not demonstrate that the proposed groundwater supply is environmentally acceptable. Furthermore, in fractured-rock aquifers, drilling a replacement bore does not necessarily restore the quantity or reliability of the original supply. An existing agricultural water supply cannot simply be treated as replaceable without evidence.

Our community considers it unacceptable to defer the identification of potential impacts on existing groundwater users until after the principal project approval has been granted.

> POSITION SOUGHT

Require proposed groundwater extraction locations to be identified and assessed before determination wherever groundwater is relied upon as a construction supply. This must include sustainable yield (measuring recharge rates), pumping tests, predicted drawdown, drought reliability and impacts on neighbouring bores and groundwater-dependent ecosystems.

If groundwater supplies cannot be demonstrated to be reliable and environmentally acceptable, they must be excluded from the proposed supply strategy.

6 | Drought and construction water demand -acknowledged uncertainty left unresolved

The EIS estimates 1,751 ML of non-potable water for water carting associated with dust suppression and earthworks. This represents approximately 73% of the transmission project's total construction water requirement. The project includes extensive access tracks, earthworks, multiple work fronts and substantial construction traffic across difficult terrain.

These circumstances make the reliability of the water-demand estimate particularly important.

Section 18.3.6.3 acknowledges that dust-suppression requirements may increase during dry conditions, while the availability of water may decline.

> Source: EIS Section 18.3.6.3, p. 699. Section 18 - Surface water and flooding (PDF) (1).pdf

Yet EnergyCo proposes further consideration of this demand during detailed design. This is an extraordinary uncertainty to leave unresolved in a project for which water availability is already a significant constraint. The EIS has not adequately demonstrated how its estimates respond to prolonged drought, increased dust-suppression requirements or reduced local water availability.

It is possible that the greatest construction water requirements will arise precisely when the available supply is most constrained.

EnergyCo cannot reasonably conclude that construction water demand can be met without demonstrating how its estimates perform under the conditions most likely to challenge that conclusion. The issue is not whether a future contractor can adjust water-carting schedules. It is whether the project can be constructed within acceptable environmental limits when both water demand and water scarcity increase.

> POSITION SOUGHT

Require EnergyCo to provide the calculation basis for dust suppression and earthworks water demand, including road lengths, traffic volumes, watering rates and credible drought scenarios.

The assessment must demonstrate how supply will be secured under those conditions and identify the consequences if water is unavailable.

7 | Walcha - the scale of demand has not been reconciled with local availability

This is an area identified as high demand and limited supply.

.The October 2026 Regional Water Demand Update estimates approximately 1,566 ML of construction water demand associated with proposed projects located within Walcha LGA between 2027 and 2035. The modelled peak annual demand is approximately 403 ML in 2033, equivalent to around 1.1 ML per day averaged over the year. This is substantial relative to Walcha's existing town water demand of less than 1 ML per day, as identified in EnergyCo's earlier water-security studies.

It must be recognised that the modelled Walcha demand is attributed according to project location and does not necessarily represent water to be sourced within the LGA or supplied by Walcha Council. Nevertheless, these figures reveal the scale of the supply challenge.

If water is to be extracted locally, EnergyCo must demonstrate that suitable supplies exist without compromising existing users. If water is to be imported, the source, transport requirements and additional infrastructure impacts must be assessed.

The annual average also disguises potential peak daily requirements. Water demand will fluctuate with the construction program, concrete manufacture, earthworks, access-track construction and dust suppression.

The EIS has not demonstrated that these peak requirements can be met from reliable identified sources.

> POSITION SOUGHT

Require a Walcha-specific water balance addressing peak daily demand, drought reliability, existing water requirements and the impacts of alternative supply arrangements.

8 | Cumulative water availability -the missing half of EnergyCo's regional assessment

The October 2026 regional update estimates total water demand of 7,318 ML across the modelled wider REZ construction program between 2027 and 2035.

However, the update explicitly acknowledges that it does not assess water supply sources, availability or existing community demand. This is a major limitation. The regional forecast may provide an estimate of demand, but it cannot demonstrate that sufficient water exists to meet that demand.

Furthermore, the update relies on modelled project development scenarios, generic water-use benchmarks and assumptions about construction timing. Actual development schedules may differ materially. Projects may be delayed, accelerated or constructed concurrently in combinations not captured by the modelled scenario.

This matters because multiple developments may compete for water from the same limited catchments, aquifers or suppliers.

The EIS's project-level cumulative impact assessment does not remove the need to examine whether the proposed transmission project will contribute to unacceptable cumulative pressure on shared water resources.

A finding that each project proposes to comply with water-sharing rules does not, by itself, demonstrate that the combined construction program can obtain reliable water without unacceptable consequences.

The regional water-demand update also states that individual projects must demonstrate secure water supply and cumulative impacts before planning approval. EnergyCo must explain how that pre-approval expectation on generation projects is not applied to their own transmission EIS.

> POSITION SOUGHT

Require a source-specific cumulative water assessment considering existing users, peak construction demand, realistic project overlap, drought and the reliability of proposed supply options.

9 | Wastewater disposal - another essential service left to detailed design

The SEARs expressly require details of wastewater disposal arrangements. The EIS estimates approximately 120 ML of liquid wastewater and slurry from construction amenities, including workforce accommodation camps.

It proposes wastewater treatment, reuse where appropriate and off-site disposal where necessary.

However, the final design, treatment capacity and disposal arrangements remain substantially dependent on detailed design and future decisions. This leaves the community completely unable to assess and make comment. It also allows EnergyCo to pass on responsibility to a contractor that will have this process approved without community scrutiny – once again.

Mitigation SW7 leaves the design and capacity of wastewater management systems to that later stage.

> Sources: EIS Section 18, mitigation SW7, p. 704; Section 23, Table 23.2, p. 766. Section 18 - Surface water and flooding (PDF) (1).pdf Section 23 - Waste (PDF).pdf

Section 23 also proposes subsequent confirmation of the licensed facilities and capacity available to accept waste. This raises further questions concerning whether proposed disposal facilities can accommodate the quantities generated, particularly where multiple regional construction projects may compete for limited wastewater infrastructure.

The issue is directly relevant to water security because wastewater reuse forms part of EnergyCo's potential water supply hierarchy. EnergyCo cannot rely upon wastewater reuse as a contribution to water supply without demonstrating that the necessary treatment, storage and reuse arrangements are achievable.

> POSITION SOUGHT

Require the proposed wastewater treatment, reuse and disposal arrangements to be demonstrated as feasible before determination, including appropriate capacity and contingency assessment.

10 | WaterNSW's requirements concerning Lake Glenbawn

WaterNSW's amended advice of 22 January 2026 acknowledges that the revised transmission alignment avoids earlier impacts at Chaffey Dam. However, it expressly maintains requirements concerning Lake Glenbawn, WaterNSW land, infrastructure, water quality and associated catchments. The advice also calls for consideration of cumulative impacts involving other renewable energy developments being investigated on WaterNSW land.

Source: WaterNSW, Revised Scoping Report Advice, 22 January 2026, pp. 1–2. Amended advice - WaterNSW.pdf

The EIS considers the Lake Glenbawn environment and identifies potential impacts involving water quality, erosion, acid sulfate soils and groundwater. However, important questions remain concerning whether all relevant infrastructure interactions, alternatives and cumulative impacts have been adequately examined.

The presence of an assessment does not establish that the concerns raised by WaterNSW have been satisfactorily resolved.

> POSITION SOUGHT

Require EnergyCo to demonstrate specifically how each applicable WaterNSW recommendation has been addressed, including a response to the request for assessment of cumulative development on WaterNSW land.

11 | The wider failure - transferring essential assessment into post-approval processes

The deficiencies identified above reveal a common problem.

EnergyCo repeatedly relies on future investigations, detailed design and management plans to resolve questions that determine the project's environmental impacts.

The following matters are examples:

Matter	What remains unresolved
Water supply	Actual sources, reliable quantities and delivery arrangements
Groundwater extraction	Locations, sustainable yields and drawdown impacts
Drought demand	Higher dust-suppression requirements and corresponding supply availability
Cumulative water demand	Physical capacity of shared sources under overlapping demand
Wastewater	Final treatment and disposal capacities
Water infrastructure	Consequential pumping, storage, extraction and transport works

These are not merely operational details. Their resolution may require changes to construction methods, water sources, access routes, associated infrastructure, project staging or mitigation. Some may reveal impacts that have not been adequately assessed in the exhibited EIS.

Once approval has been granted, the opportunities for affected communities to influence those decisions will be significantly narrower.

Our separate Appendix – The CWO Experience – Failure of Process documents why assurances of later management and protection should not automatically be accepted as sufficient.

The appendix includes evidence of implementation failures, weaknesses in the effectiveness of consultation and complaints processes, and continuing concerns about cumulative resource planning. It does not suggest that every example represents a statutory breach or that deferred design caused every CWO problem. Rather, it demonstrates why commitments to future processes require scrutiny and why important environmental questions should be answered while the project remains subject to formal assessment.

The EIS process should not operate as an opportunity to approve an incompletely assessed project and transfer the consequences of unresolved design decisions to affected communities. This is especially troubling where the missing information could identify new affected landholders or environmental impacts only after approval.

12 | Conclusion - the Department must require EnergyCo to finish the assessment

Our community acknowledges that the EIS contains substantial information about water demand, groundwater, surface water, flooding and wastewater. However, the critical question is whether that information is sufficient to demonstrate that the project can be constructed without unacceptable environmental impacts.

On the evidence reviewed, significant questions remain unanswered. EnergyCo has not demonstrated a complete and reliable water supply strategy. It has not undertaken source-specific groundwater extraction assessment for production bores that may be needed for construction.

It has acknowledged uncertainties concerning drought-related demand and the physical availability of water. It has not established the source-specific cumulative water balance necessary to demonstrate the effects of competing regional construction demand. And it proposes to resolve important wastewater servicing arrangements during detailed design.

Water quality is a further unresolved constraint, addressed in Part 3, subsection 4.5. The arsenic results and acknowledged gaps concerning existing groundwater users require source-specific investigation. EnergyCo must establish the quality and suitability of proposed supplies, investigate uranium and other relevant contaminants, assess drought and pumping-related changes, and demonstrate any necessary treatment and waste-management arrangements before those sources are relied upon to establish the project's acceptability.

These deficiencies are directly relevant to the requirements imposed by the Planning Secretary and to the detailed concerns raised by DCCEEW Water.

Our community considers that the EIS has addressed several water-related SEARs requirements in form without adequately resolving important matters of substance.

It is not sufficient for EnergyCo to identify a requirement, nominate the section in which it is discussed and declare it addressed. The Department must determine whether the actual information provided satisfies the requirement and supports a reliable assessment conclusion.

Where the information is missing, uncertain or deferred, the Department should require further assessment before determination.

We do not seek further studies merely to generate more paperwork. We seek evidence that the project's essential construction resources can be secured, that environmental impacts can be identified and that proposed protections are achievable. If the required water cannot be reliably obtained without unacceptable impacts, the project must be redesigned, modified, reduced or staged accordingly.

Our community requests that DPHI not recommend approval of the project while material uncertainties concerning construction water supply, groundwater extraction impacts and wastewater servicing remain unresolved.

The project should only proceed on the basis of a sufficiently defined, environmentally assessed and demonstrably feasible construction proposal.

Principal documents relied upon

- DPHI, Amended Planning Secretary's Environmental Assessment Requirements, 7 April 2026, pp. 1–6.
- DCCEEW Water, Comments on the Secretary's Environmental Assessment Requirements, 23 December 2025, Attachment A.
- WaterNSW, Advice on Revised Scoping Report, 22 January 2026.
- Engeny, Technical Report 14 -Surface Water Assessment, 24 September 2026, particularly Sections 4–5.
- Aurecon, Technical Report 16 -Groundwater Impact Assessment, 28 September 2026.
- Aurecon, Technical Report 15 -Hydrology and Flood Impact Assessment, 9 September 2026.
- EnergyCo, EIS Section 18 -Surface Water and Flooding, October 2026.
- EnergyCo, EIS Section 19 -Groundwater, October 2026.
- EnergyCo, EIS Section 23 -Waste, October 2026.
- EnergyCo, EIS Section 24 -Cumulative Impacts, October 2026.
- EnergyCo, New England REZ Regional Water Demand Update, October 2026.
- Joint community groups, Appendix – The CWO Experience – Failure of Process, 21 October 2026.

Part 2
Statutory exemptions and the importance of complete assessment before approval

The New England REZ Network Infrastructure Project has been declared Critical State Significant Infrastructure (CSSI). This status provides EnergyCo with significant exemptions from statutory approval requirements that would ordinarily apply to activities affecting water resources.

Under **section 5.23 of the Environmental Planning and Assessment Act 1979**, approved State Significant Infrastructure does not require several separate approvals under the *Water Management Act 2000*, including:

- Water use approvals under section 89.
- Water management work approvals under section 90.
- Activity approvals under section 91, other than aquifer interference approvals. This includes controlled activity approvals for works on waterfront land.

This is outlined on page 149 of the EIS. These exemptions remove separate approval processes that would otherwise apply to water use, water infrastructure and certain activities affecting rivers and waterways.

Further exemptions are available under Schedule 4 of the Water Management (General) Regulation 2025.

These include exemptions from water access licensing requirements for qualifying public-authority activities associated with dust suppression and the construction of essential infrastructure, including electricity transmission infrastructure.

These exemptions are subject to statutory conditions. For example, the essential-infrastructure exemption includes requirements to record and report water taken, while the dust-suppression exemption is conditional on avoiding significant adverse impacts on water sources and dependent ecosystems.

Nevertheless, the combined effect is significant.

EnergyCo may be able to undertake substantial water-related activities without obtaining some of the separate approvals ordinarily required under the Water Management Act.

This places even greater importance on the EIS providing a complete and credible assessment of water requirements, extraction locations, water-source availability and environmental impacts before approval is granted.

The EIS should not rely on the assumption that unresolved water-related impacts will necessarily be examined through subsequent, separate approval processes. For activities covered by these exemptions, those processes may not occur.

This is especially concerning because EnergyCo proposes to defer its detailed Water Supply Strategy, the selection and investigation of groundwater extraction locations, and important water management arrangements until detailed design.

Page 80 of Technical Report 14 – Surface Water Assessment states;

> *Although the project is exempt from requiring water works approvals, water use or water access licences (Section 2.2.2), EnergyCo aims to avoid impacting environmental water and existing water availability, where possible.*

This is not satisfactory, especially given that the water sourcing assessment and arrangements are completely absent from the EIS.

The consequences are obvious. The project could receive its principal environmental approval before the locations and impacts of significant water extraction activities have been adequately established.

Our community considers that the statutory exemptions reinforce, rather than diminish, EnergyCo's responsibility to provide a sufficiently detailed assessment during the EIS process.

The assessment should establish the feasibility and environmental acceptability of proposed water sourcing before the project is approved, particularly where affected landholders would otherwise have limited opportunity to scrutinise subsequent decisions.

> QUESTION REQUIRING RESPONSE

1. Which water-related activities proposed for this project will be exempt from separate approvals and water access licensing requirements?
2. What statutory conditions apply to each exemption, and how will compliance be independently verified?
3. If proposed extraction locations and quantities are finalised after approval, what independent environmental assessment and public scrutiny will apply?
4. How will affected water users be informed and protected where a separate Water Management Act approval is not required?
5. How can the Department be satisfied that the impacts of exempt activities have been adequately assessed when their locations, quantities and operational arrangements remain unresolved?

> POSITION SOUGHT

Our community requests that DPHI require EnergyCo to identify all water-related statutory exemptions on which it intends to rely, together with the activities, extraction locations and quantities covered by those exemptions.

The environmental impacts of these activities must be adequately assessed before determination.

Where separate statutory approvals will not be required, the principal project approval must provide clear, enforceable protections, including extraction limits, environmental performance requirements, monitoring, reporting and mechanisms to prevent unacceptable impacts.

Fundamental questions concerning water supply and extraction must not be deferred to post-approval processes that provide less independent scrutiny or opportunity for community participation.

Legislative references

Provision	Effect
EP&A Act 1979, s 5.23	Removes specified separate approvals for approved SSI, including certain water use, water management work and controlled activity approvals.
Water Management (General) Regulation 2025, Schedule 4	Provides conditional water access licence exemptions, including for public-authority dust suppression and essential-infrastructure construction.
NSW Water — State significant development and infrastructure	Explains which approvals are waived and when water access licences remain necessary.

Part 3
Water Study incomplete

1. Construction Water Supply Has Not Been Demonstrated

1.1 Water requirements

The EIS estimates approximately **2,400 ML** of construction water over the approximately six-year construction period:

Requirement	Volume
Potable water	360 ML
Non-potable water	2,040 ML
Total	2,400 ML

The transmission project accounts for approximately 1,751 ML of water carting requirements associated with dust suppression and earthworks.

> Sources: EIS Section 3.3.13, Table 3.11; Section 18.3.5, pp. 693–694.

These quantities are estimates of demand. They do not establish that water has been secured.

1.2 Potential sources are not demonstrated supplies

EnergyCo identifies numerous possible sources, including existing water licence holders, harvestable rights, commercial suppliers, councils, groundwater bores and regulated or unregulated waterways.

Section 18.3.6.1 acknowledges that the final sourcing arrangements will depend on supplier willingness, proximity, infrastructure requirements and climate reliability.

This is not a completed water supply assessment.

The EIS compares estimated demand against water-sharing-plan allocations. However, allocations cannot automatically be treated as water physically available to EnergyCo.

Actual supply depends on the willingness of entitlement holders, extraction infrastructure, water-sharing rules, existing demand, streamflow, groundwater yield and drought restrictions.

The Macleay example illustrates the problem. The EIS estimates peak annual non-potable demand of 152.8 ML against regional allocations of 1,796 ML. The resulting ratio of approximately 8.5% does not demonstrate that 152.8 ML is available at an accessible extraction location.

> Sources: Technical Report 14, Table 4.3, p. 87; EIS Section 18, Table 18.3, p. 698.

> QUESTIONS REQUIRING RESPONSE

1. Which specific sources are proposed to supply construction?
2. What volume will each source provide, annually and during peak demand?
3. Which suppliers have confirmed capacity and willingness to supply?
4. What evidence demonstrates physical availability during drought?
5. What extraction, storage and delivery infrastructure will be required?
6. Have the impacts of those additional works been assessed?

> POSITION SOUGHT

Require a demonstrated, source-specific construction water supply strategy before determination. This must establish the reliability, legal availability, physical deliverability and environmental impacts of each proposed supply.

1.3 Location of source not matching location of demand

Ground Water supply is split between catchments, and the EIS p138, talks about balancing the draw from these catchments.

The project area is situated across multiple regulated and unregulated river and groundwater Water Sharing Plans (WSPs) across the Gwydir, Namoi, Macleay and Hunter catchments. Construction water demand would be sourced across these catchments, reducing reliance on any individual water resource.

Drawing water for construction purposes across a large region does not work that way, you need to draw water where you need it. If water is not available where it is needed, it needs to be transported. The proposed quantities make this a significant exercise in logistics and road usage. This reality needs to be assessed and planned. None of this has been completed or described.

> POSITION SOUGHT

Require a demonstrated, source-specific construction water supply strategy before determination, that includes local balancing between supply and demand. Where this balance is not able to be demonstrated, adequate transportation (or other) solutions needs to be described, and planned.

2 | Walcha - An acute imbalance between demand and availability

2.1 Scale of additional construction demand

EnergyCo's October 2026 Regional Water Demand Update provides the following estimates for projects located within Walcha LGA between 2027 and 2035:

Water demand	Estimated volume
Potable	379 ML
Non-potable water	1,187 ML
Total	1,566 ML

> Source: EnergyCo, New England REZ Regional Water Demand Update, October 2026, Tables 1 and 2, pp. 6 and 8.

The modelled peak year is 2033, with approximately 98 ML potable and 305 ML non-potable demand.

This represents 403 ML in one year, or approximately 1.1 ML/day averaged across that year.

EnergyCo's earlier Water and Wastewater Security Study identified Walcha's existing town water demand as less than 1 ML/day.

The projected construction requirement is therefore substantial relative to the scale of Walcha's existing town water system.

However, the regional model allocates demand according to the location of proposed projects, not necessarily the location from which their water will be extracted.

It does not establish that the additional demand will be supplied by Walcha Council.

This distinction is fundamental.

If water is to be obtained locally, the availability of suitable sources must be demonstrated. If water is to be imported, the extraction, storage, pumping, transport and environmental consequences of those alternative arrangements must be assessed.

2.2 Peak daily demand is particularly important

The annual average of 1.1 ML/day does not represent peak daily demand.

Water demand will vary considerably with the construction program, earthworks, concrete production, dust suppression and seasonal conditions.

Peak demand may coincide with the driest conditions, when local water supplies are least reliable.

The EIS does not adequately demonstrate the peak daily requirements for the Walcha construction area against the physical availability of water from identified local sources.

> QUESTIONS REQUIRING RESPONSE

1. the projected Walcha LGA demand is expected to be sourced within the LGA?
2. What are the peak daily requirements for the transmission project and overlapping generators?
3. What reliable local supply is available during drought?
4. How much additional water is genuinely available beyond existing agricultural, town and environmental requirements?
5. What infrastructure and traffic impacts would arise if water must be imported?
6. In scenarios of water deficiency, who has precedence and priority for water access? Will the developer have priority over town water supply? Will agricultural users of bore water have to deal with issues of bore drawdown as a result of high usage in neighbouring Energy Co bores? Our community has absolutely

> POSITION SOUGHT

EnergyCo must demonstrate how the projected Walcha construction demand can be met under realistic peak and drought conditions without unacceptable impacts on existing users. Assurances must be given to our community and businesses that access to water will not be compromised by Energy Co having priority usage of a large share of available water.

This assessment must be completed before approval, including evaluation of the impacts of importing water if local supplies are insufficient.

2.3 Conflict of water access at Walcha Council Drinking Water off-take site.

As noted on page 44 of the Technical Report 14 – Groundwater, there is a very close proximity between the Walcha Drinking Water Offtake site on the McDonald River, filling the Walcha Storage dam, and the project area.



Figure 1 - **Walcha Off Creek Storage Dam, completed in 2024, is only 2km downstream of the NE REZ Project footprint. Photo courtesy of Moree Online News https://moreeonlinenews.com.au/2024/10/26/new-off-stream-storage-dam-for-walcha/**

As the table notes,

> *"Walcha drinking water offtake located approximately 2 km east of and downslope of the project area"*

This raises 3 issues that are not dealt with in the Technical Report 14, that require a response;

1. How is sediment control being dealt with, given the close proximity and downstream nature of the town water supply offtake, relative to the construction site.
2. How is contamination from chemical spills, material waste etc, being dealt with at this location, given the severity of outcome if a spill occurs?
3. How is prioritisation of water supply being managed at this site, where the project could be drawing water from the McDonald River, upstream of the Walcha Town Water offtake site.

> POSITION SOUGHT

Energy Co must demonstrate how they will ensure that there is not a conflict of water access and harvesting ability, as well as how they will ensure that there are no adverse contamination or sediment issues arising from the close proximity of operations to the Walcha Council Drinking Water offtake site. A plan to avoid the incident is not sufficient. EnergyCo must outline a procedure that remedies the situation, should this occur.

The response to these questions, and Position Sought, will be indicative of the manner in which EnergyCo, and the NSW Government, are willing to protect our community, or run over the top of us. Assurances of goodwill by producing a plan, deferred until after determination no less, is not a satisfactory solution. Everyone is aware of the process that has predictably let down the community of the Central West Orana Region. We need to know what the remedy will be, for all scenarios of potential failure, sufficient to quell the anxiety and concern that our community currently has around this project, and the culture of the renewable roll out in the regional areas of NSW.

This community expectation applies to all "plans to mitigate" that exist throughout the EIS, from protection of the Bell's Turtle in the MacDonald River, to the protection of stock water currently sourced from fracture rock bores throughout the new England Area – in the next section.

3 | Workforce Accommodation Camps - The Waverley Road Water Supply Case Study

The EIS proposes five workforce accommodation camps. Camp 2 is identified on Waverley Road at Waverly, near Gundy. Its practical servicing requirements provide a test of the EIS's broader claim that construction water needs can be met through sources to be identified later. Peter Tout, a landholder near the proposed camp, has supplied an account of the surrounding agricultural district, its reliance on carefully managed private water supplies, drought conditions and constraints of local road access (edited account at Appendix 2). His observations warrant site-specific investigation; they are not a substitute for surveys or water-supply testing.

3.1 What EnergyCo actually forecasts

EnergyCo's Technical Report 7, Traffic and Transport Impact Assessment (28 September 2026, Section 6.2.5, Table 6-2), estimates a peak project workforce of approximately 1,400 people and an average main construction workforce of about 880 FTE. Table 6-11 (printed p. 92) assigns approximately 300 workers to Camp 2 during peak construction, rather than an equal share of a hypothetical 6,000-person workforce. These are indicative numbers; occupancy will vary with the construction program.

The EIS separately estimates 360 ML of potable water across construction: 340 ML for workforce personnel and 20 ML for concrete manufacture (EIS Section 3.3.13, Table 3.11, p. 138). The 360 ML is a project-wide total, not an allowance for each camp.

3.2 The scale of the site-specific servicing task

A transparent illustration remains useful. At Peter's assumed consumption rate of 180 litres per resident per day, 300 residents would require 54,000 litres (54 kL) of potable water per day. If all of this water had to arrive in 20,000-litre tankers, it would be equivalent to approximately three inbound tanker deliveries per day at peak occupancy, plus return journeys. This is a scenario, not a finding that tankers are the only feasible supply – although there appears very little alternative. Lower or higher occupancy, verified use rates, water treatment and reuse would change the estimate.

The EIS does not provide a sufficiently detailed camp-by-camp assessment to demonstrate the reliable potable water source, peak daily supply, on-site treatment and storage capacity, or drought contingency for Camp 2. Nor is it clear how these site-specific choices are reconciled with proposed wastewater treatment and disposal and the road movements required to service an isolated construction camp.

3.3 Local experience reveals a wider assessment gap

Peter describes an agricultural landscape whose existing occupants have limited services and must conserve water carefully during drought. He also describes the winding rural road, limited existing traffic and watercourse crossings affected by heavy rain. These are firsthand observations that should be tested against the proposed camp design, site investigations and traffic and flooding assessments. EnergyCo should not assume that future procurement will remove the environmental or logistical consequences of extracting, treating, trucking or storing water at this location.

If a dependable supply or suitable wastewater disposal cannot be established, the camp may require different servicing infrastructure, additional deliveries, redesign or relocation. Such changes could create further impacts for neighbours, affect the assessed construction traffic and add cost or delay. They are not inconsequential details that can safely be left to post-approval contractors.

> POSITION SOUGHT

Before determination, EnergyCo should publish a site-specific servicing assessment for each proposed accommodation camp, beginning with Waverley Road. This must specify realistic daily and peak potable demand, verified source and supplier capacity, storage and treatment, wastewater arrangements, delivery routes, drought contingencies and material impacts on neighbouring properties. Any materially changed camp location or servicing design should receive appropriate further environmental assessment and public scrutiny.

> Sources: EIS Section 3.3.5 and Section 3.3.13, Table 3.11; Technical Report 7 - Traffic and Transport Impact Assessment, 28 September 2026, Section 6.2.5 and Tables 6-2 and 6-11; Peter Tout, EIS Potable Water Analysis (landholder account, edited at Appendix 2).

4 | Groundwater Availability and Impacts

4.1 Limitations of fractured-rock aquifers

The EIS acknowledges that groundwater across much of the project area occurs in fractured-rock aquifers and that availability can vary substantially over short distances.

> Source: EIS Section 19.2.1, p. 710.

This is particularly relevant to the New England Tablelands.

Groundwater in fractured rock depends upon the occurrence, extent and connectivity of water-bearing fractures. Nearby bores may have very different yields and recovery characteristics.

Jennifer Blaikie of NSW Public Works provided regional engineering advice dated 31 July 2026 explaining the variability of fractured-rock bore yields, the uncertainty associated with locating productive fractures and the difficulty of obtaining large, reliable volumes.

Her advice is general regional guidance rather than a site-specific investigation. It supports the need for properly demonstrated yields at actual proposed extraction locations.

> Source: Jennifer Blaikie, NSW Public Works, correspondence, 31 July 2026. See Appendix 1 within this section 8 of our submission.

4.2 Groundwater extraction locations remain unknown

The Groundwater Impact Assessment relies substantially on regional information and qualitative risk assessment.

Potential construction groundwater extraction locations have not been established.

Technical Report 16 states that modelling the impacts of future groundwater extraction is premature because production-bore locations and the necessary site-specific data are unavailable.

> Sources: Aurecon, Technical Report 16 – Groundwater Impact Assessment, 28 September 2026, Section 2.2; EIS Section 19.3.6, pp. 715–716.

Without identified sources, the EIS cannot fully establish sustainable yields, predicted drawdown or effects on neighbouring bore users and groundwater-dependent ecosystems.

This is particularly important given the 608 registered bores identified within the groundwater study area, with additional unregistered basic-landholder-rights bores potentially present.

> Source: EIS Section 19.2.2, p. 711.

4.3 Drought reliability and make-good measures

The EIS acknowledges that prolonged drought can reduce groundwater recharge and affect groundwater levels.

Mitigation GW4 proposes monitoring and responses such as reduced pumping, bore replacement, bore deepening and potentially managed aquifer recharge.

However, these measures cannot be assumed to restore equivalent supply in a fractured-rock system. Nor does the report identify what triggers a reduction in pumping.

Similarly, a twelve-month baseline monitoring period may not demonstrate the response of groundwater resources to prolonged drought.

> Sources: EIS Section 19.3.6, p. 715; mitigation GW4, pp. 720–721.

> QUESTIONS REQUIRING RESPONSE

1. Where are the proposed production bores?
2. What sustainable yields have been demonstrated?
3. What drawdown is predicted at neighbouring bores and sensitive ecosystems?
4. How will extraction perform during multi-year drought?
5. What evidence demonstrates that proposed make-good measures can provide an equivalent replacement supply?
6. What is the trigger for a reduction in pumping, due to neighbouring bores losing capacity, and what is the proposed monitoring program for these neighbouring bores?
7. Why has this assessment been deferred until after approval?

> POSITION SOUGHT

Require identification and source-specific assessment of proposed groundwater supplies before determination.

Where unacceptable impacts cannot be avoided, extraction from that source should not be permitted. Monitoring and make-good provisions should protect against residual impacts, not substitute for demonstrating an acceptable extraction regime.

4.4 Where does the water come from?

We note that again that there is little detail of where the ground water sources are. There is acknowledgment, however, of the limits to this supply, and the lack of certainty of these quantities being able to be drawn from ground water.

- The Peel Alluvium water source is over-allocated relative to its extraction limit, p30 of the Groundwater Technical report
- Fractured rock aquifers are generally characterised by low storage and highly variable yields, with groundwater occurrence and movement largely controlled by the presence and connectivity of fractures, faults and weathered zones. As such, the ability to extract large quantities of groundwater from these aquifers is often limited and highly site-specific. This limitation of fractured rock bores is supported by the correspondence from Jennifer Blaikie, Project Engineer with NSW Public Works. (See Appendix 1 of this section.
- The report further cautions: "While there are a number of registered bores in the Peel Fractured Rock Water Source, the majority are used for stock and domestic purposes, reflecting the generally low and unreliable yields available for larger-scale extraction."
- Most existing use in the Peel Fractured Rock Water Source is for small-scale, domestic, or stock purposes, not for large-scale irrigation or industrial supply. This is not simply an indication of capacity, it is a license restriction of these bores.'

4.5 Groundwater quality — arsenic, uranium and treatment requirements

Groundwater quality is a further constraint on the project's water supply and its potential effects on existing users. The EIS records arsenic above drinking-water guidelines at several monitoring locations, acknowledges limited groundwater-quality data and identifies an unresolved potential drinking-water pathway through hydraulically connected bores. These findings require explicit consideration in the assessment of water availability and impacts. [1, 2]

Technical Report 16 considers groundwater only for non-potable construction demands. The relevant questions are therefore whether each proposed source is suitable for its intended construction use, what treatment and waste management it requires, and whether project activities could affect neighbouring supplies. A drinking-water exceedance does not, by itself, establish that the water is unsuitable for every non-potable use. [1, §6.2]

Arsenic exceedances have already been measured

Arsenic is a metalloid, although it is often discussed alongside metals in water-quality assessments. The Australian Drinking Water Guidelines set a health-based arsenic guideline of 0.01 mg/L, equivalent to 10 micrograms per litre (µg/L). Technical Report 16 adopts that criterion and reports the following primary groundwater sample results. [1, 3, 4]

Monitoring bore and reported location	Primary sampling dates and arsenic results	Comparison with 10 µg/L drinking-water guideline
BH009 — Central-South Hub	8 January 2025: 18 µg/L 12 February 2025: 15 µg/L 18 March 2025: 18 µg/L	All three samples exceeded the guideline: 1.5–1.8 times.
BH129 — approximately 10 km north of Central Hub A	7 January 2025: 11 µg/L 12 February 2025: 6 µg/L 18 March 2025: 5 µg/L	The first sample exceeded the guideline: 1.1 times.

Monitoring bore and reported location	Primary sampling dates and arsenic results	Comparison with 10 µg/L drinking-water guideline
BH117 — approximately 5 km southwest of Central Hub A	6 January 2026: 14 µg/L 5 February 2026: 28 µg/L	Both primary samples exceeded the guideline: 1.4–2.8 times.

> Sources: Technical Report 16, Table 4-15, printed p40; Technical Report 19, §6.2.5, printed p56. These are monitoring bores, not confirmed project production bores.

The highest primary sample was 28 µg/L. Technical Report 19 reports a maximum of 29 µg/L because the laboratory results include a duplicate of the February 2026 BH117 sample. That duplicate is relevant quality-assurance information, rather than a separate sampling occasion. The repeated BH009 exceedances and the two BH117 exceedances warrant attention; the available results do not establish the quality of every bore in the project area. [1, 2]

The drinking-water comparison must also be kept distinct from other criteria. These arsenic measurements are below the 0.5 mg/L, or 500 µg/L, livestock drinking-water trigger adopted in Table 4-15. The results therefore do not establish an arsenic exceedance of that livestock criterion. Suitability for construction uses, irrigation or discharge must be assessed against the relevant use, exposure and receiving environment. [1]

Existing users and groundwater connections remain incompletely assessed

Technical Report 19 describes its groundwater dataset as limited: seven monitoring bores were sampled. It identifies 96 registered bores within the contamination study area, including 52 water-supply bores and 18 stock/domestic bores. These 96 bores relate to a different study area from the 608 registered bores discussed earlier in this section; they are not 96 tested or contaminated bores. [2, §6.3.3]

The report acknowledges that a potential drinking-water pathway through hydraulically connected bores cannot be discounted and that further data are required to determine the risk to surrounding residents or stock. It also describes this as a pre-existing site condition, independent of construction. The measured arsenic must therefore not be attributed to the proposed project. Nevertheless, the existing uncertainty requires a proper baseline and assessment of any additional effects from proposed abstraction, excavation or dewatering. [2, §§6.3.3 and 8.3.2]

Technical Report 16 itself identifies a general risk that large drained excavations could mobilise or concentrate polluted groundwater. This is a reason to investigate contaminant movement where relevant; it does not establish that the project will increase arsenic concentrations or affect a particular neighbouring bore. [1, printed p64]

Uranium has not been resolved by the published groundwater results

Uranium is not listed in the published groundwater testing schedules and analytical panels reviewed in Technical Reports 16 and 19. Those records therefore provide no uranium result on which to establish source suitability. An omitted analyte cannot be treated as a substance that was tested and not detected. [1, Appendix F; 2, Tables 6-2, 6-5 and 6-8 and Appendix B, Table D]

Separately, Armidale Regional Council's 18 February 2026 report on EnergyCo's regional studies refers to documented uranium and fluoride exceedances above Australian Drinking Water Guidelines in nearby local government areas. That passage does not identify a uranium detection in an NE REZ monitoring bore or provide a project-specific uranium concentration. The general groundwater-quality warning already reproduced in Appendix 1 of this Section 8 is also advice about potential conditions, rather than a laboratory result. [5; Section 8, Appendix 1]

These matters support a requirement for initial uranium screening of proposed groundwater sources, together with arsenic, fluoride and other contaminants relevant to the geology and intended use. Any proposal to omit uranium should be supported by adequate local evidence. If uranium is detected at a concentration requiring treatment for the intended use, the treatment design must separately demonstrate adequate uranium removal.

Drought and sustained pumping can change arsenic concentrations

Drought can increase arsenic concentrations in some groundwater systems, but the response is not uniform. Reduced recharge and changing groundwater levels can alter flow paths, the water entering a bore and the chemical conditions controlling arsenic release from minerals. The local response depends on geology, groundwater chemistry and pumping conditions. Australian investigations at Lake Gwelup linked declining groundwater levels, associated with reduced rainfall and abstraction, to oxidation of sulfide minerals and mobilisation of arsenic. That different aquifer provides evidence of a possible mechanism, not a prediction for the New England fractured-rock systems. [7]

US research also illustrates the need for a qualified assessment. National modelling found that drought could increase the probability of elevated arsenic in domestic wells. Conversely, observations in California's San Joaquin Valley found a predominant decrease in arsenic during drought-related pumping stress, largely reversed during recovery. These studies show why the direction and magnitude of change at a proposed NE REZ source must be investigated rather than assumed. [8, 9]

Technical Report 16 acknowledges drought-related groundwater risks and recommends at least 12 months of baseline monitoring before extraction. The additional requirement is to establish how the selected sources' water quality may respond to the proposed pumping rates, cumulative extraction and credible prolonged drought conditions. Seasonal sampling, pumping and recovery tests, and an assessment of groundwater chemistry should support that evaluation. A limited set of baseline samples cannot establish stable water quality throughout a future drought. [1, printed p54]

Arsenic treatment is possible, but its performance must be demonstrated

Arsenic can be removed from water using suitable processes, including iron-based adsorptive media, coagulation followed by filtration, reverse osmosis and certain ion-exchange systems. Treatment selection depends on the arsenic species, pH, other dissolved constituents and required flow. Where arsenite, As(III), is present, conversion to arsenate, As(V), may be needed before effective removal. Oxidation is a preparation step and must be followed by an appropriate removal process. Arsenic speciation should therefore be investigated where needed for treatment design. [3, 6]

Boiling does not remove dissolved arsenic and can increase its concentration in the remaining water. Treatment must be selected and verified for the actual contaminant and source-water conditions. [10]

Treatment transfers captured arsenic into residuals, which may include sludge, spent media or concentrated liquid reject. Reverse osmosis also produces a reject-water stream, so the usable treated volume is lower than the raw volume supplied to the plant. These consequences need to be included in the project water balance and waste assessment. [6]

For each source requiring treatment, EnergyCo should demonstrate a feasible process and capacity, expected treated-water quality and usable yield, allowance for changing raw-water quality, monitoring and maintenance requirements, contingency supply and a practicable route for managing residuals. A general statement that groundwater may require treatment does not establish those matters for an identified source.

For non-potable uses such as dust suppression, the assessment should identify the applicable quality criteria and evaluate contaminant loads and pathways to land, runoff and receiving waters against the actual

abstraction rates, volumes and application locations. Drinking-water criteria should be applied where drinking-water exposure is relevant. The required outcome is suitability for the actual use and protection of existing users and the environment.

> QUESTIONS REQUIRING RESPONSE

- Which groundwater sources will actually be used, for which purposes and volumes, and what testing establishes their arsenic, uranium and other relevant contaminant concentrations?
- Which existing private supplies may be hydraulically connected to groundwater containing elevated arsenic, and what baseline information is needed to assess any additional project effects?
- How will water quality respond to the proposed extraction rates, cumulative pumping, prolonged drought and subsequent recovery?
- Where treatment is required, what evidence demonstrates reliable performance, treatment capacity, usable-water yield and the gross abstraction needed to deliver that yield?
- How will contaminated residuals be managed, and what assessment supports any proposed application of water to land or discharge to receiving waters?
- What monitoring, action thresholds, independent verification and funded responsibilities will trigger treatment changes, reduced or suspended pumping and equivalent replacement supplies where project activities adversely affect existing users?

> POSITION SOUGHT

Require source-specific groundwater-quality assessment before determination for each groundwater source relied upon in the project's supply strategy. This must address arsenic, uranium screening and other relevant contaminants, drought and pumping-related variability, effects on existing users, suitability for the intended use, and the feasibility of any necessary treatment and residual-waste management.

Only the reliable volume suitable for the intended use, after necessary treatment and associated losses, should be counted as available supply. Where suitable water quality after any necessary treatment, reliable usable yield or protection of existing users cannot be demonstrated, that source must be excluded from the demonstrated supply strategy and the project's water demand or sourcing arrangements revised accordingly

5 | Risk of understating construction water demand

EnergyCo's construction water allowances are not adequately substantiated and appear materially understated. The published figures are not a credible basis for approving construction on this scale. The October 2026 regional update adopts the transmission EIS estimates; it does not independently validate them. EnergyCo must justify its low allowances with quantities, application rates and a construction program that can be checked. The community should not have to discover the true demand after approval. [11–13]

5.1 The concrete allowance is implausibly low

EIS Tables 3.11 and 3.12 allow only 20 ML of potable water for concrete manufacture and supply, against 76,000 m^3 of concrete for towers and lines, 73,000 m^3 for hubs and 850 m^3 for ancillary infrastructure. Across that 149,850 m^3, the allowance implies approximately 133.5 litres per cubic metre. EnergyCo has not disclosed the mix designs and water accounting needed to explain that low figure. [11, pp.138, 140]

Boral's Australian Concrete Guide illustrates 180 L/m^3 for an 80 mm slump. The Valley of the Winds assessment adopts 170–175 L/m^3 for its proposed mixes. Applying 170–180 L/m^3 to EnergyCo's quantity gives 25.5–27.0 ML of total mix water: an unexplained difference of 5.5–7.0 ML from the potable allowance, before separately accounting for washing, curing and losses. These documented rates warrant a direct engineering response. [14, pp.8–9; 15, p.18]

Total mix water and new potable supply are different quantities. If aggregate moisture, recovered washwater or other sources explain the difference, EnergyCo must quantify those contributions. TfNSW's concrete specification requires aggregate moisture to be measured and added water adjusted accordingly. A possible contribution is not a demonstrated saving. EnergyCo must disclose gross process use, internal reuse and new supply without counting the same water twice. [16, cls.15.31–15.33]

Our Winterbourne submission exposed the same need for a quantity-based check: 119 foundations at 700 m^3, using 150–200 L/m^3, implied 12.5–16.7 ML of mix water against the initial 6 ML batching estimate. That calculation remains a useful test of the published allowance. EnergyCo must answer the equivalent calculation for its own project. [20, Part F, §1.7]

The concrete budget must separately identify mixer and plant washout, work-area cleaning, pre-wetting, curing, evaporation and other losses. Holcim's guidance shows why curing needs its own method and exposed-area calculation: some methods retain existing moisture, while others add water. Omitting these uses, or assuming recovery without a plant water balance, would understate the requirement. [17]

The regional update's change from potable to non-potable concrete water does not reduce physical consumption. Its rejection of the earlier 960 L/m^3 assumption does not establish a complete replacement budget. TfNSW permits non-potable and recycled mixing water subject to controls; EnergyCo must demonstrate suitability and quantify savings. The transmission EIS still classifies its 20 ML allowance as potable. [11, p.138; 12, pp.3, 12–13; 16, cl.10]

5.2 Road construction requires its own water calculation

EnergyCo combines dust suppression and earthworks in a 1,751 ML water-cart allowance. Technical Report 14 expressly includes compaction at access tracks and road upgrades, but does not provide the quantities and rates needed to reproduce that allowance. Naming an activity is not evidence that adequate water has been allowed for it. [11, p.138; 13, p.84]

The EIS identifies 1,734,000 m^3 of quarry products. Material used in compacted roads, hardstands and earthworks requires a moisture-conditioning calculation: the volume and dry density of each material, its

existing moisture, the target compaction moisture and losses during placement. TfNSW R44 requires moisture to be measured and adjusted for compaction. EnergyCo must disclose how much water it has allowed for this work. [11, p.140; 18, §7.1]

ARTC's Border to Gowrie assessment allows 100 L/m^3 of fill for conditioning, separately from dust suppression and embankment maintenance. At that comparator rate, every 100,000 m^3 requires 10 ML. The relevant NE REZ material quantities and moisture deficits must be established before applying a rate. EnergyCo must provide that calculation and show the volume remaining for dust control; the combined total conceals this essential distinction. [19, p.B5-1]

5.3 Dust suppression needs a credible allowance for dry conditions

The EIS describes approximately 580 km of access tracks, with upgrades generally providing access widths up to about four metres. Dust demand depends on the area actively trafficked or exposed, the application rate and the number of watering days. EnergyCo has not published those inputs behind its combined allowance. A lifetime total with no reproducible calculation gives the community no basis for accepting its adequacy. [11, §3.3.8, pp.125–126; 13, pp.84–87]

The Valley of the Winds assessment uses 2.5 L/m^2/day and warns that low rainfall can increase demand considerably. At that rate, an illustrative 100 km of active road, four metres wide, requires 1 ML per watering day, or 300 ML over 300 watering days. An extra 1 L/m^2/day adds 120 ML over the same period. This is one active-road scenario; it excludes other exposed work areas and stockpiles. [15, p.20]

EnergyCo must identify active lengths and widths by construction stage, unsealed haul routes, traffic levels, stockpiles, work fronts, watering frequencies and duration. Any reductions attributed to rainfall, rehabilitation, restricted traffic or chemical suppressants need an explicit basis. Compaction and dust control must be reconciled wherever one application serves both purposes.

The drought problem identified in Part 1, section 6 is particularly damaging to this estimate. Technical Report 14 recognises that prolonged dry conditions increase demand, yet leaves that increase to detailed design. EnergyCo is asking for approval before quantifying a foreseeable condition that could substantially increase the combined dust-suppression and earthworks requirement. The Department should reject that deferral and require the dry-weather calculation now. [13, §4.4.1.2, p.87]

5.4 Personnel demand must account for occupancy and duration

The camp-servicing problems are addressed in Part 3, section 3. The additional issue is whether EnergyCo has allowed enough water for the people who will live and work on the project. The EIS provides 340 ML of potable water for personnel and a separate 272 ML of non-potable water for general camp maintenance, without a published calculation that reconciles these totals with occupied beds, actual workdays and the services provided. [11, p.138]

For renewable projects, the regional update adopts 185 L/person/day at accommodation camps plus 60 L/person/day at worksites. It uses the transmission EIS estimate separately. EnergyCo cannot treat the regional rates as proof that its transmission allowance is adequate: the number of occupied bed-days and worksite person-days must also be demonstrated. Local workers, rosters, support staff and construction delays must be accounted for explicitly. [12, pp.7, 12]

At 185 L/person/day, an illustrative 550 occupied beds require 101,750 litres daily. A day with all 550 people at worksites adds 33,000 litres. An extra 100 days of full camp occupancy adds approximately 10.2 ML before worksite use. Omitting occupancy days, service staff or camp activities would translate directly into understated demand.

ARTC allows 250 L/person/day for camp facilities. The comparison requires EnergyCo to identify exactly what its rates cover: catering, laundry, showers, cleaning, grounds and maintenance. It must reconcile those services with the separate 272 ML allowance and disclose any treatment losses and reuse credits. An unexplained project total does not answer these questions. [19, pp.B5-4–5]

5.5 Published forecasts are a weak basis for regional benchmarks

The regional update derives its generation-project benchmarks from published estimates for more than 60 projects, including 0.178 ML/MW/year for non-potable wind-project demand. It does not identify those estimates as measured construction consumption. Installed capacity cannot substitute for the physical work: roads, foundations, earthworks, occupancy and watering days. Repeating forecasts through a regional model does not validate their accuracy. [12, p.10]

Winterbourne illustrates why those forecasts require scrutiny. Its September 2024 Submissions Report allowed approximately 50 ML for concrete, 350 ML for pavement construction and up to 300 ML for dust suppression over about four years: up to approximately 700 ML for those uses, plus additional potable needs. These are the developer's revised forecasts, not recorded consumption. They reinforce the need to test preliminary allowances against detailed construction requirements. [21, Table 4-12, p.50]

EnergyCo must disclose its reference projects, the forecast versions used and their validation against actual consumption. It must test whether the benchmark captures difficult terrain, long access networks and prolonged dry weather. The cumulative supply consequences are addressed in Part 3, section 6; this demand calculation must be corrected before it is used in that assessment.

> QUESTIONS REQUIRING RESPONSE

- What concrete volumes, mix-water rates and plant water balances justify the 20 ML allowance, including washing, curing, aggregate moisture, recycling and losses?
- What separate volume is allowed for road and earthworks moisture conditioning, and what material quantities and moisture deficits support it?
- What active areas, watering rates, frequencies and construction durations support the dust allowance, including a prolonged-drought case and peak daily demand?
- What occupied bed-days, worksite person-days, support staff and camp services support the personnel allowance, and how are they reconciled with camp maintenance?
- Which benchmark inputs are measured consumption, which are forecasts, and how have their scope, construction duration and local conditions been checked?
- What higher-demand scenario will EnergyCo adopt if these calculations exceed its published allowances, and how will that change the assessed supply, transport and environmental impacts?

> POSITION SOUGHT

DPHI should not accept EnergyCo's low, unverified allowances as the basis for approval. Require a fully itemised construction water budget covering concrete, road construction, dust suppression and personnel, with ordinary and prolonged-drought cases, peak daily requirements and independently checked assumptions. Any claimed savings from recycling or alternative water quality must be demonstrated. EnergyCo must do this work before determination; the community is not responsible for reconstructing the proponent's missing calculations. Approval should not transfer the consequences of an understated budget to existing water users.

6 | Cumulative Water Demand

6.1 The wider REZ water requirement

The October 2026 regional update estimates total construction water demand of 7,318 ML between 2027 and 2035, comprising 1,913 ML potable and 5,405 ML non-potable water.

The model covers a representative program of 35 generation and storage projects and the network infrastructure, while excluding pumped hydro.

The update expressly states that it does not assess actual water sources, their availability or existing community and other-user demand.

> Source: New England REZ Regional Water Demand Update, October 2026, pp. 5, 10–13.

The report therefore provides a demand scenario, not evidence that the regional water resources can meet it.

6.2 Source-specific cumulative effects

Section 24 of the EIS assesses cumulative impacts based on identified future projects and assumed construction schedules.

It acknowledges differences between the project-level cumulative assessment and the broader regional infrastructure studies.

> Source: EIS Section 24, pp. 776–779.

The critical question is whether projects may compete for the same physical water sources.

A regional total of available entitlements does not establish sufficient water in a particular catchment, river or aquifer during an intensive construction period.

Similarly, different project commencement dates may materially change the peak cumulative requirement.

A source-based assessment must consider existing agricultural, community and environmental demand as well as foreseeable construction demand.

6.3 Responsibility for cumulative resource management

The October regional update states that individual projects must demonstrate secure water supply and assess cumulative impacts before planning approval.

However, the broader regional studies leave physical supply availability and infrastructure capacity investigations continuing into 2027.

> Source: New England REZ Regional Water Demand Update, October 2026, pp. 14–16.

The relationship between these commitments and the assessment of the transmission project requires clarification.

> QUESTIONS REQUIRING RESPONSE

1. Which projects are expected to draw water from common sources?
2. What cumulative daily and annual demands may arise at those sources?
3. What existing water requirements have been included?
4. How do drought and alternative construction schedules change the results?
5. Which authority is responsible for assessing and managing cross-project competition?
6. How can the transmission project be determined while essential supply-capacity investigations remain outstanding?

> POSITION SOUGHT

Require a credible source-specific cumulative water balance before determination, including peak demand, drought reliability, existing users and realistic construction-overlap scenarios.

7 | Watercourses, Drainage and Flooding

The EIS identifies potential erosion, sedimentation and runoff impacts arising from earthworks, access tracks, watercourse crossings and construction facilities.

It generally concludes that impacts can be managed through standard controls.

However, Technical Report 15 acknowledges limitations in regional flood modelling, including the omission of detailed access-track, culvert and local drainage infrastructure.

> Sources: EIS Section 18, pp. 688–692; Aurecon, Technical Report 15 – Hydrology and Flood Impact Assessment, 9 September 2026, Section 5.8.

An impact considered negligible at regional scale may nevertheless be material to an affected property.

Changes to access-track drainage can concentrate runoff, damage paddocks, cause erosion and create ongoing maintenance liabilities.

The flood assessment also identifies significant flood hazards at some access crossings serving the North Hub and Central South Hub.

> Source: EIS Section 18.4, p. 701.

> QUESTIONS REQUIRING RESPONSE

1. Which unassessed or incompletely designed drainage works may affect neighbouring properties?
2. How will permanent access tracks alter local runoff?
3. What protections apply to steep slopes and vulnerable watercourses?
4. How will maintenance and emergency access be maintained during significant flooding?
5. Where would avoidance or redesign be more effective than standard erosion controls?

> POSITION SOUGHT

Require site-specific assessment of material drainage and flooding impacts before determination and avoidance or design modification where unacceptable impacts cannot be effectively mitigated.

Enforceable conditions must protect neighbouring properties, watercourses and drainage systems throughout construction and operation.

8 | The CWO Experience - Why Future Plans Are Not an Adequate Answer

Our community has provided a separate appendix:

Appendix – The CWO Experience – Failure of Process

The appendix examines the experience of the Central-West Orana REZ assessment and subsequent implementation, drawing on official documents, parliamentary findings, monitoring results, company statements and correspondence.

It records examples in which protective processes were not fully implemented, management targets were not achieved, or concerns continued after consultation and complaint procedures had been completed.

The appendix does not suggest that every recorded issue represents a breach of approval conditions, or that deferred design caused every problem.

Its relevance is the practical limitation of relying on future processes to establish protections that have not been demonstrated when approval is granted.

For water, the appendix identifies the risk of treating forecast demand, licensed allocations and physically available water as interchangeable quantities.

It also records the limitations of assessing resource demand separately for individual developments where multiple projects may depend on the same supplies.

> Reference: Appendix – The CWO Experience – Failure of Process, 21 October 2026, particularly Sections 6–9 and CWO Case Study 04.

The CWO approval includes condition B15, requiring EnergyCo to have sufficient water for all stages of development and, where necessary, adjust the scale of development to match available water supply.

> Source: Central-West Orana REZ Transmission Project – Infrastructure Approval, 26 June 2024, condition B15, p. 11.

That provides an appropriate example of an enforceable outcome.

However, a condition requiring sufficient water does not by itself establish where the water will come from, who may be affected or whether the relevant environmental impacts have been adequately assessed.

Our community therefore seeks both adequate pre-approval assessment and enforceable conditions.

> POSITION SOUGHT

DPHI should not accept commitments to future investigations, design or management as substitutes for information needed to determine the environmental acceptability of the project.

Where essential information remains missing, EnergyCo should be required to complete the assessment before determination and provide affected communities with an appropriate opportunity to examine material new information.

9 | Conclusions and Recommendations

The EIS has identified water requirements and possible supply options, but it has not demonstrated that its construction water allowances are adequate or that reliable supplies can be secured without unacceptable impacts on existing users and the environment. EnergyCo must substantiate both the quantities it proposes to use and the sources from which that water will be obtained.

This is particularly significant in the New England Tablelands, where small headwater catchments, variable fractured-rock aquifers and drought conditions constrain water availability.

EnergyCo's own modelling indicates substantial additional water demand in the Walcha area and across the wider REZ.

The physical availability of that water remains unresolved.

The central deficiency is not simply the absence of a final construction management plan. It is the absence of sufficient source-specific information to establish whether water can be obtained, what impacts extraction may cause and whether those impacts can be avoided or satisfactorily mitigated.

The same assessment deficiency applies to groundwater quality. Arsenic exceedances have been recorded at several monitoring locations, but the quality of future production sources and potential connections to existing users remain incompletely established. The available analytical records also leave uranium unresolved. A credible supply assessment must establish a reliable volume suitable for its intended use after any necessary treatment, and address drought performance, additional effects on existing users and management of contaminated residuals.

The Waverley Road workforce accommodation case study (Part 3, Section 3; Peter Tout's edited account at Appendix 2) illustrates why source-specific water and wastewater arrangements are needed before approval: the project's total water estimate does not demonstrate how an individual rural camp can be serviced without unexpected impacts.

Our community requests that DPHI:

1. Require a demonstrated construction water supply strategy before determination, identifying sources, quantities, availability, supplier commitments, extraction and delivery methods, and associated environmental impacts.
2. Require source-specific groundwater assessment, including sustainable yields, drought performance, effects on existing bores and groundwater-dependent ecosystems.
3. Require source-specific groundwater-quality assessment before determination, including arsenic, initial uranium screening, fluoride and other relevant contaminants; seasonal and pumping-related variability; credible drought conditions; and potential hydraulic connections to existing supplies.
4. Require demonstrated suitability for each intended use and, where treatment is needed, a feasible treatment process and capacity, verified performance criteria, usable-water yield, gross abstraction requirements, contingency supply and an assessed method of managing contaminated residuals.
5. Require enforceable monitoring and action thresholds for water quality and existing-user effects, independent verification, clear funding and responsibility, and reduced or suspended pumping and equivalent replacement supply where necessary to address adverse project-related effects.
6. Require EnergyCo to substantiate and, where necessary, increase its construction water-demand allowances for concrete production and associated uses, road construction and compaction, dust suppression and personnel. The revised budget must disclose physical quantities, application rates, construction duration, camp occupancy, treatment losses and verified reuse, including prolonged dry conditions and peak daily demand. Unverified low allowances must not be accepted as the basis for approval.

7. Require a credible cumulative water balance, including shared sources, existing users, drought conditions and overlapping project construction.
8. Require site-specific investigation and design changes where necessary to avoid unacceptable effects on drainage, watercourses, groundwater and neighbouring properties.
9. Require material assessment deficiencies to be resolved before determination, with further public scrutiny of additional information that materially changes the assessed impacts.
10. Impose enforceable conditions requiring construction to remain within demonstrated water supply and environmental limits, including reduced or suspended construction activity where water is insufficient.
11. Require avoidance, modification or refusal of the relevant project component where reliable supply or acceptable environmental outcomes cannot be demonstrated.

Final position

Our community does not assert that adequate water supplies are unavailable everywhere within the proposed REZ.

We assert that EnergyCo has not adequately demonstrated that the water required for construction can be reliably obtained from identified sources without unacceptable environmental and community impacts.

The availability of water is a fundamental constraint on project feasibility, not a detail that can be assumed to be resolved after approval.

Water quality is part of that fundamental constraint. A source cannot be counted as a demonstrated supply until its suitability for the intended use, reliable usable yield after any necessary treatment, management of contaminated residuals and protection of existing users have been established. The possibility of treatment does not establish that an unidentified or insufficiently tested source will provide an acceptable supply. These matters must be resolved before that source is relied upon to support approval.

The Department should require EnergyCo to establish that the project can be constructed within demonstrated water supply and environmental limits before determining whether the proposed development is acceptable.

Principal References

The following references are referred to generally in the document.

Engeny, New England REZ Network Infrastructure Project – Technical Report 14: Surface Water Assessment, 24 September 2026. Particularly Table 1.1, Sections 4–5 and Appendix A.

Aurecon, New England REZ Network Infrastructure Project – Technical Report 15: Hydrology and Flood Impact Assessment, 9 September 2026. Particularly Sections 5.8 and 7–9.

Aurecon, New England REZ Network Infrastructure Project – Technical Report 16: Groundwater Impact Assessment, 28 September 2026. Particularly Sections 2.2, 4–6 and 8.

EnergyCo, New England REZ Network Infrastructure Project EIS – Section 18: Surface Water and Flooding, October 2026, pp. 682–707.

EnergyCo, New England REZ Network Infrastructure Project EIS – Section 19: Groundwater, October 2026, pp. 708–722.

EnergyCo, New England REZ Network Infrastructure Project EIS – Section 24: Cumulative Impacts, October 2026, pp. 775–815.

NSW DCCEEW Water Group, Comments on the Secretary's Environmental Assessment Requirements – New England REZ Transmission Project, 23 December 2025, Attachment A.

EnergyCo, New England REZ Regional Water Demand Update, October 2026, pp. 5–16.

Jacobs, New England REZ Water and Wastewater Security Study, December 2025.

Jennifer Blaikie, NSW Public Works, correspondence concerning regional water availability, 31 July 2026.

NSW Department of Planning, Housing and Infrastructure, *Central-West Orana REZ Transmission – Assessment Report*, June 2024.

NSW Minister for Planning and Public Spaces, *Central-West Orana REZ Transmission – Infrastructure Approval*, 26 June 2024, particularly conditions B15–B20.

Joint community groups, *Appendix – The CWO Experience – Failure of Process*, 21 October 2026, particularly Sections 6–9 and CWO Case Study 04.

EnergyCo, New England REZ Network Infrastructure Project - Technical Report 7: Traffic and Transport Impact Assessment, 28 September 2026, particularly Section 6.2.5 and Tables 6-2 and 6-11.

Peter Tout, EIS Potable Water Analysis, landholder contribution supplied October 2026 (edited summary at Appendix 2; calculations reviewed against EnergyCo Technical Report 7).

The following references are referred to directly in the document.

[1] Aurecon (28 September 2026), New England REZ Network Infrastructure Project EIS, Technical Report 16 — Groundwater Impact Assessment. Table 4-15, printed pp40–41 (PDF pp41–42); §6.2, printed pp51–54 (PDF pp52–55), including non-potable groundwater sourcing and baseline-monitoring recommendations; risk assessment, printed p64 (PDF p65); Appendix F, PDF pp234–237.

[2] Aurecon (4 September 2026), New England REZ Network Infrastructure Project EIS, Technical Report 19 — Contamination Impact Assessment. §6.2.5, printed p56 (PDF p57); §6.3.3, printed pp57–58 (PDF pp58–59);

§8.3.2, printed p72 (PDF p73); groundwater testing schedules in Tables 6-2, 6-5 and 6-8, printed pp49, 51 and 53; Appendix B, groundwater Table D, PDF pp238–240.

[3] National Health and Medical Research Council, Australian Drinking Water Guidelines, "Arsenic", guideline and treatment sections. Source

[4] Australian Government Department of Climate Change, Energy, the Environment and Water, National Pollutant Inventory, "Arsenic and compounds". Source

[5] Armidale Regional Council, Ordinary Council Meeting agenda, 18 February 2026, item 9.9, "Review of EnergyCo Regional Major Infrastructure Studies", printed p101. The statement concerns uranium and fluoride exceedances in nearby LGAs; it does not identify a project monitoring-bore uranium result. Source

[6] United States Environmental Protection Agency, "Overview of Drinking Water Treatment Technologies", sections on anion exchange, reverse osmosis/nanofiltration and adsorptive media. Source

[7] Clohessy, S.G. (2012), Perth Shallow Groundwater Systems Investigation: Lake Gwelup, Hydrogeological Record HG56, Western Australian Department of Water, summary and introduction. Source

[8] Lombard, M.A., Daniel, J., Jeddy, Z., Hay, L. and Ayotte, J.D. (2021), "Assessing the impact of drought on arsenic exposure from private domestic wells in the conterminous United States", Environmental Science & Technology 55(3), 1822–1831. Source

[9] Levy, Z.F., Jurgens, B.C., Faulkner, K.E., Harkness, J.S. and Fram, M.S. (2024), "Basin-scale responses of groundwater-resource quality to drought and recovery, San Joaquin Valley, California", Hydrological Processes. Source

[10] HealthLink BC (25 July 2025), "Arsenic in drinking water", File 49c, treatment and boiling advice. Source[EnergyCo, NE REZ Network Infrastructure Project EIS, October 2026, §§3.3.8 and 3.3.13; Tables 3.11–3.12, pp.125–126, 138 and 140. Source

[12] EnergyCo, Regional water demand update, October 2026, pp.2–3, 5–10 and 12–13. Source

[13] Engeny, Technical Report 14 Surface Water Assessment, 24 September 2026, §§4.4.1–4.4.1.2, pp.84–87. Source

[14] Boral, Australian Concrete Guide, 2023 edition 2.1, pp.8–9. Source

[15] icubed consulting, Valley of the Winds Infrastructure and Resource Assessment, revision C, 28 February 2024, pp.18 and 20. Source

[16] TfNSW, TS 00146:1.0 Supply of Special Class Concrete, effective 30 April 2025, cl.10 and cls.15.31–15.33, pp.29–30 and 40. Source

[17] Holcim Australia, Curing of concrete techniques, sections on curing methods and evaporation. Source

[18] TfNSW, QA Specification R44 Earthworks, edition 6 revision 0, June 2023, §7.1, pp.47–48. Source

[19] ARTC, Border to Gowrie Revised Draft EIS, May 2025, Appendix B5 Construction Water, pp.B5-1 and B5-4–5. Source

[20] Voice for Walcha, Winterbourne Wind EIS Submission, Part F, §1.7, p.10 (PDF p.75).

[21] ERM, Winterbourne Wind Farm Submissions Report, 20 September 2024, Table 4-12, response DPE Water_2, p.50 (PDF p.58). Source

Appendix 1

Correspondence from Jenifer Blaikie

---------- Forwarded message ---------
From: **Jennifer Blaikie**
Date: Fri, 31 Jul 2026 at 5:05 pm
Subject: RE: Water security New England REZ
To: Rachel Greig
Cc: Robert Powell, Clare Silcock

Dear Rachel

NSW Public Works does not have a current (or recent) engagement with Walcha Shire Council so the information I have is based on work either I did or colleagues have done for other New England councils or public information about Walcha. To develop more specific answers, NSW Public Works or another consultant would need to be engaged.

The very generic information is:

1. NSW country town water supply and sewerage infrastructure is usually sized for the expected growth, with very little additional capacity for unexpected events. This is largely because of the
    a. tight construction budgets
    b. the need to provide cost effective services in terms of operations and maintenance (bigger equipment is generally more expensive to operate and maintain)
2. Walch's water supply has recently been upgraded. The upgrade will have been scoped based on the growth expected at the time of the last water supply strategy. This is likely to have had minimal growth as no-one was expecting the REZ or equivalent projects.
3. The New England Tablelands region is close to the top of the Great Dividing Range, this means that most catchments are very small, it also means that storms coming from the east generally drop a lot of rain in the hilly areas to the east due to orographic effects (basically warm wet air is pushed up the range, as it gets higher the temperature drops and the rain falls on the hills and doesn't make it to the tablelands).
4. The majority of the rock in the New England regional is igneous rocks including lots of granite (and related rock types), this rock has low porosity (can hold very little water when compared to sandstone). This means that the dominant type of aquifer in the region is what is known as fractured rock, this means that the water is contained the fractures, rather than in the sand, clays and gravels beside a waterway (these are known as alluvial aquifers).
5. Obtaining water from fractured rock aquifers is more difficult than from alluvial aquifers
    a. There is much less known about the fractured aquifers because most of the investigation effort has gone into monitoring and describing the alluvial aquifers around the major rivers
    b. Drilling the bores tends to be more expensive because the rock is hard and the bores are often much deeper than the alluvial bores
    c. The fracture network varies a lot this means that

i. bores placed very close together can have big differences in their ability to access water as they may hit or miss key fractures

ii. total volume of water a bore can access varies

iii. the rate at which water seeps into the bores varies

iv. the impact of bores on each other is harder to assess

d. There is a higher chance of test bores failing to find useful volumes of water
e. There is a higher chance of the groundwater containing unsafe concentrations of radioactive minerals and/or fluoride.

6. Overall, obtaining large volumes of reliable water is more difficult in the New England Tablelands than areas further from the top of the range.

Kind regards

Jennifer

Jennifer Blaikie *(she/her)* Project Engineer, Engineering & Advisory

NSW Public Works

From: Rachel Greig
Sent: Thursday, 30 July 2026 9:32 AM
To: Jennifer Blaikie
Subject: Water security New England REZ

Dear Jennifer,

I am a councillor at Walcha Council and was in attendance at the REZ forum hosted by the University of New England where you were a panel member on water and waste water security.

I was interested in your description of the water constraints in the New England region and am particularly interested in those constraints around Walcha.

I was hoping you may be able to share the information you provided at the forum. I would also be interested to understand more about the groundwater supply that may be available in our region.

Is this something you could help me with?

I would really appreciate it if I could discuss this with you at a time that suits.

Thank you

Kind regards

Rachel

Rachel Greig
Walcha

Appendix 2

Peter Tout: Landholder Observations on Camp 2 at Waverley Road

A personal account by Peter Tout - provided for the joint community submission.

Local setting

I own a farm close to the proposed workforce accommodation camp on Waverley Road, near Gundy. I know this district through living and working in it. The surrounding properties are predominantly agricultural: farms and horse and cattle enterprises, rather than serviced urban land. Many families depend on water captured from roofs and held in tanks, carefully managed for domestic purposes and livestock. This country can become extremely dry. A proposed construction camp of this size cannot be treated as though it already has the services of a town.

The Waverley Road access is a winding rural road used by a relatively small number of residents, agricultural vehicles and a school bus. Some local crossings may become difficult or impassable after heavy rain. The likely effects of additional deliveries should be assessed at the actual proposed camp site, not simply treated as ordinary regional traffic.

What drought means to people who live here

I have seen repeated droughts cause severe hardship for landholders, livestock and the country itself. When domestic tanks are low, families may have to purchase and bring in water. Farmers already plan around limited supplies. Reliable potable water for a workforce camp must be demonstrated in these conditions, not merely during average rainfall years. A six-year construction program will encounter changing seasons, and a severe dry period is a credible risk that the EIS should address.

My concern is not that no water could possibly be supplied to the camp. It is that EnergyCo has not shown the community which source it will use, how dependable that source is, how much water is required at peak occupancy, or how existing users will be protected. Groundwater should not be assumed suitable or sufficient without yield and quality testing, and the possibility of importing water needs a proper traffic and cost assessment.

A camp is more than accommodation

Water is only one part of the servicing problem. A workers' camp needs kitchens, showers, toilets, wastewater treatment, waste collection, electricity, food and supplies, emergency access and arrangements to restore the site afterwards. Each of those services has implications for the surrounding landholders and roads. If water comes by tanker, those deliveries must be added to other traffic. If it is extracted locally, the impacts of extraction must be assessed. If wastewater is treated or carted away, the method and capacity must be explained.

The assessment must come before approval

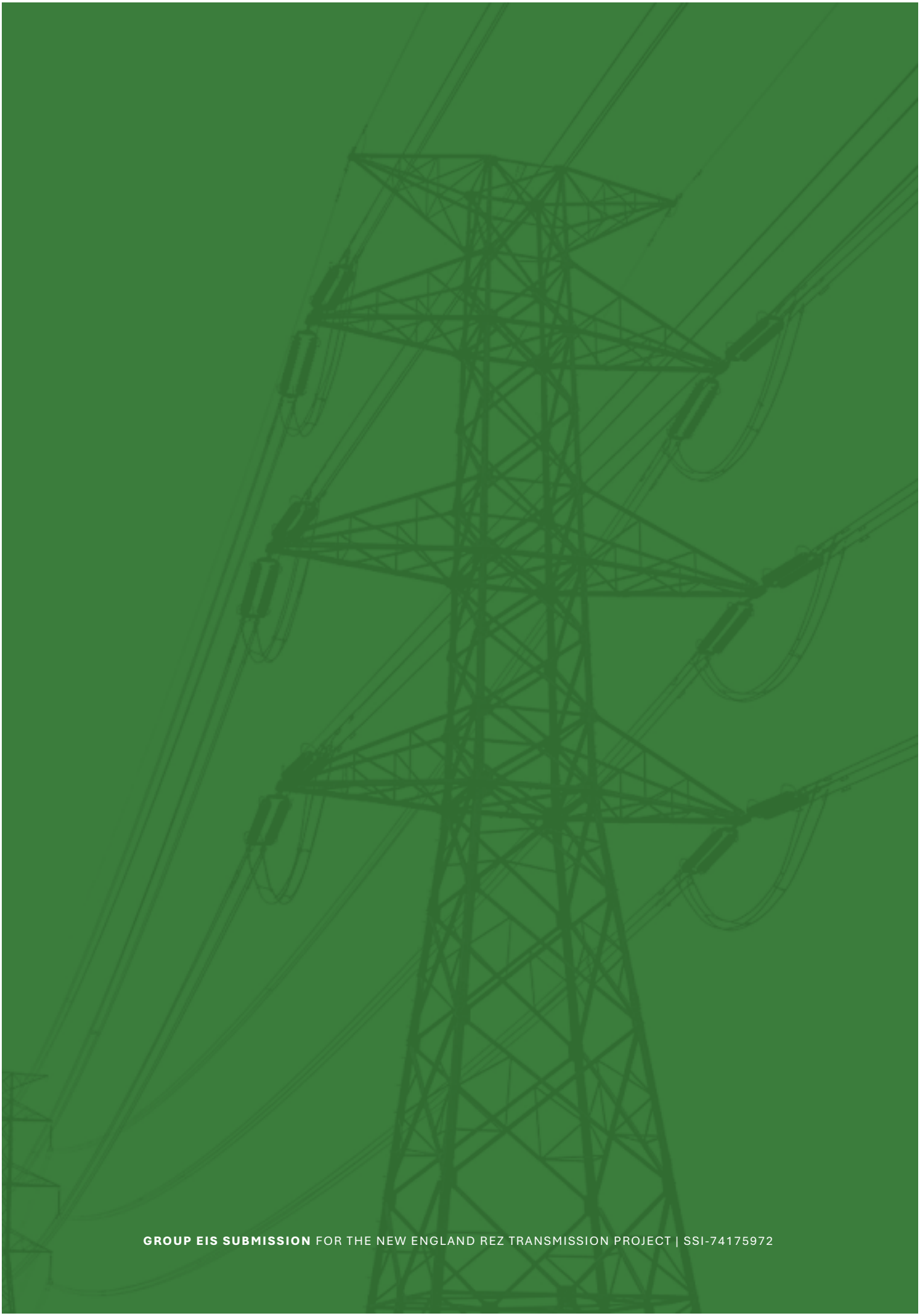
People who understand construction accept that every fitting and detail need not be finalised at the earliest stage. That is not the point. A project of this scale should establish that its essential water and service arrangements are workable, with acceptable consequences for neighbours, before receiving approval. It should not be left to a future contractor to decide where water will come from and then seek to manage previously unidentified impacts.

I ask the Department to require EnergyCo to explain and assess the potable water source, treatment, storage, wastewater servicing, delivery arrangements, drought contingency and restoration commitments for Camp 2. The same exercise is needed for the other camps. Rural residents deserve to know what is being approved, not discover the arrangements after the main decisions have been made.

SECTION 9

Project Constructability Part A, Part B and Part C

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.

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

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.**

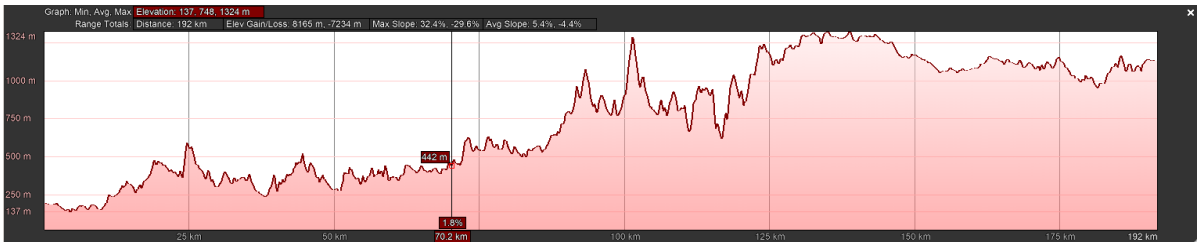
These are the same areas that are requiring helicopter access, not just for stringing, but for access for materials and construction equipment. This type of machinery is very susceptible to weather, with visibility constraints in fog and rain as well as operational constraints in windy conditions.



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.

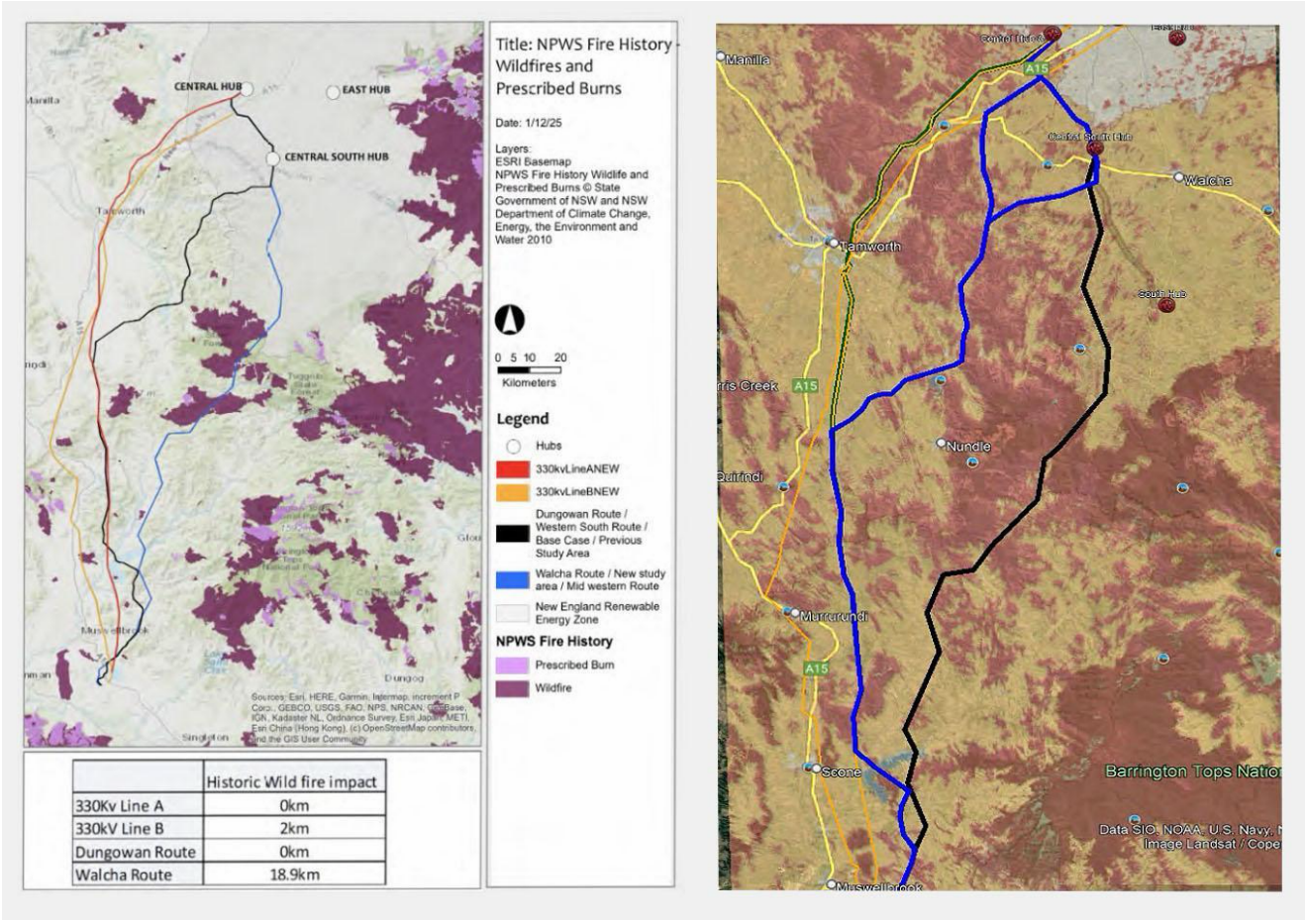
This risk is magnified by the remoteness of many tower sites and the limited routes available for evacuation. Workers could be operating a considerable distance from public roads in terrain where fire behaviour can change quickly and where safe withdrawal of personnel and heavy equipment would take time.

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

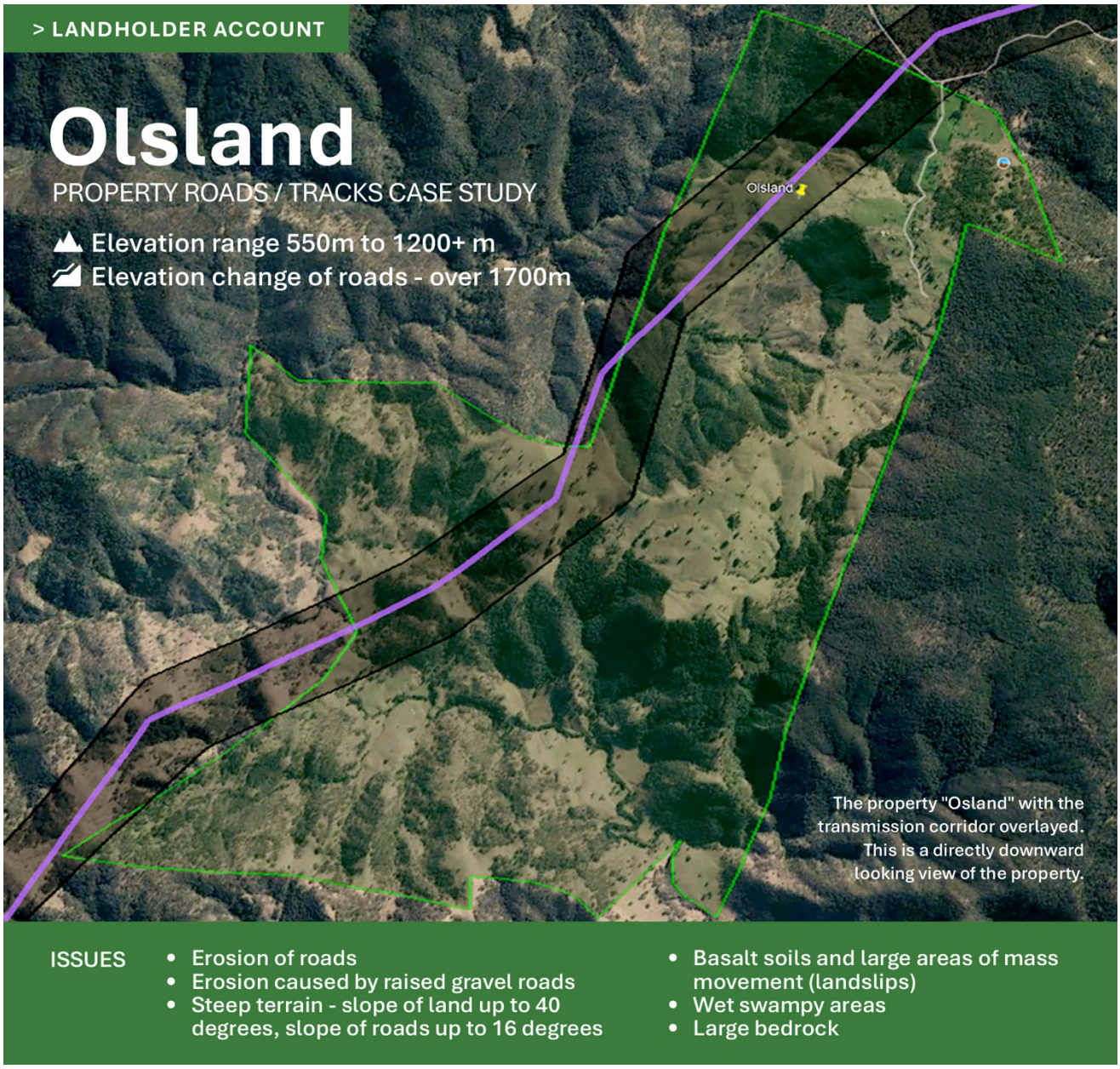
[13] EnergyCo, Environmental Impact Statement for the New England REZ Network Infrastructure Project, accompanying information and frequently asked questions, accessed 2 November 2026. Design and construction-method refinements after exhibition. Source

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.



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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.

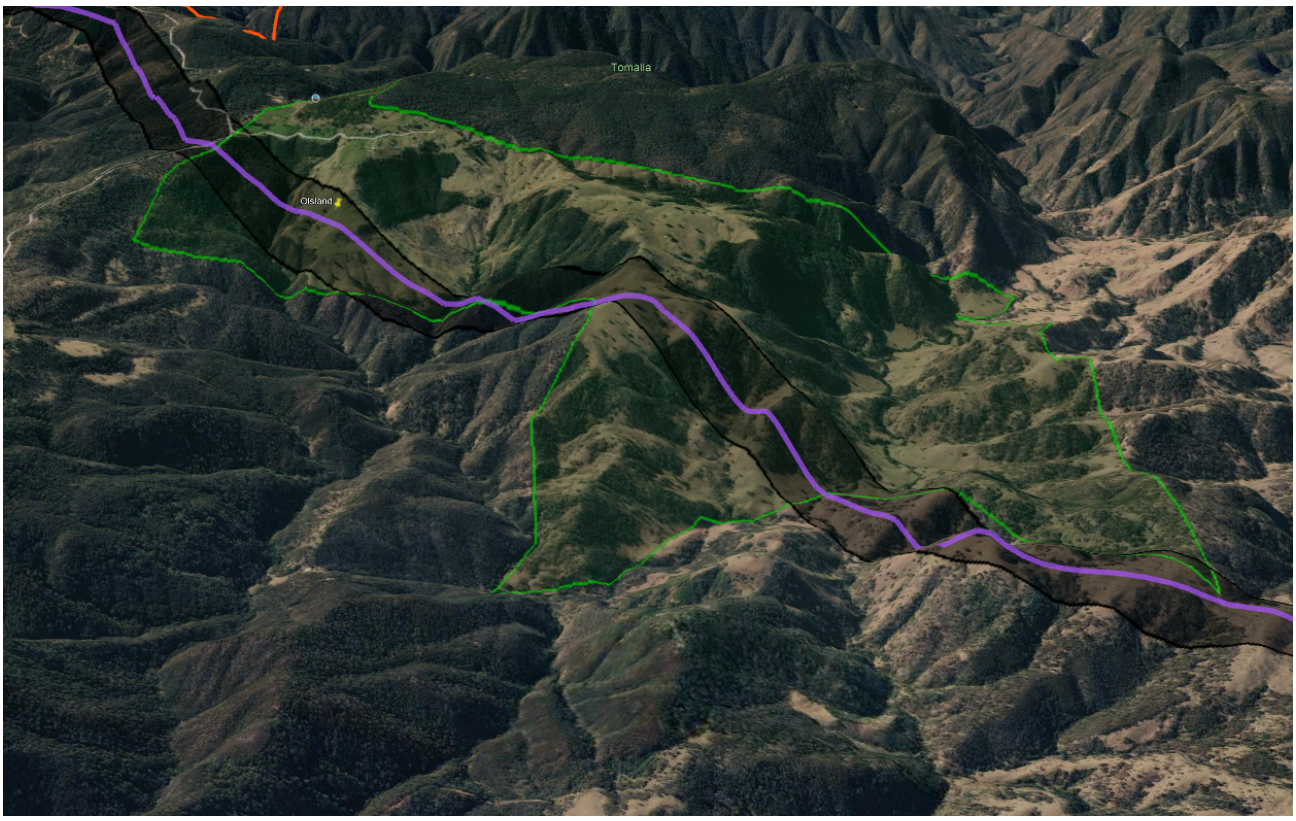

Figure 1 - "Osland", an angled view, looking east, across the steep landscape, as represented by Google Earth



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.

SECTION **10**

Erosion, Sedimentation and Ground Stability

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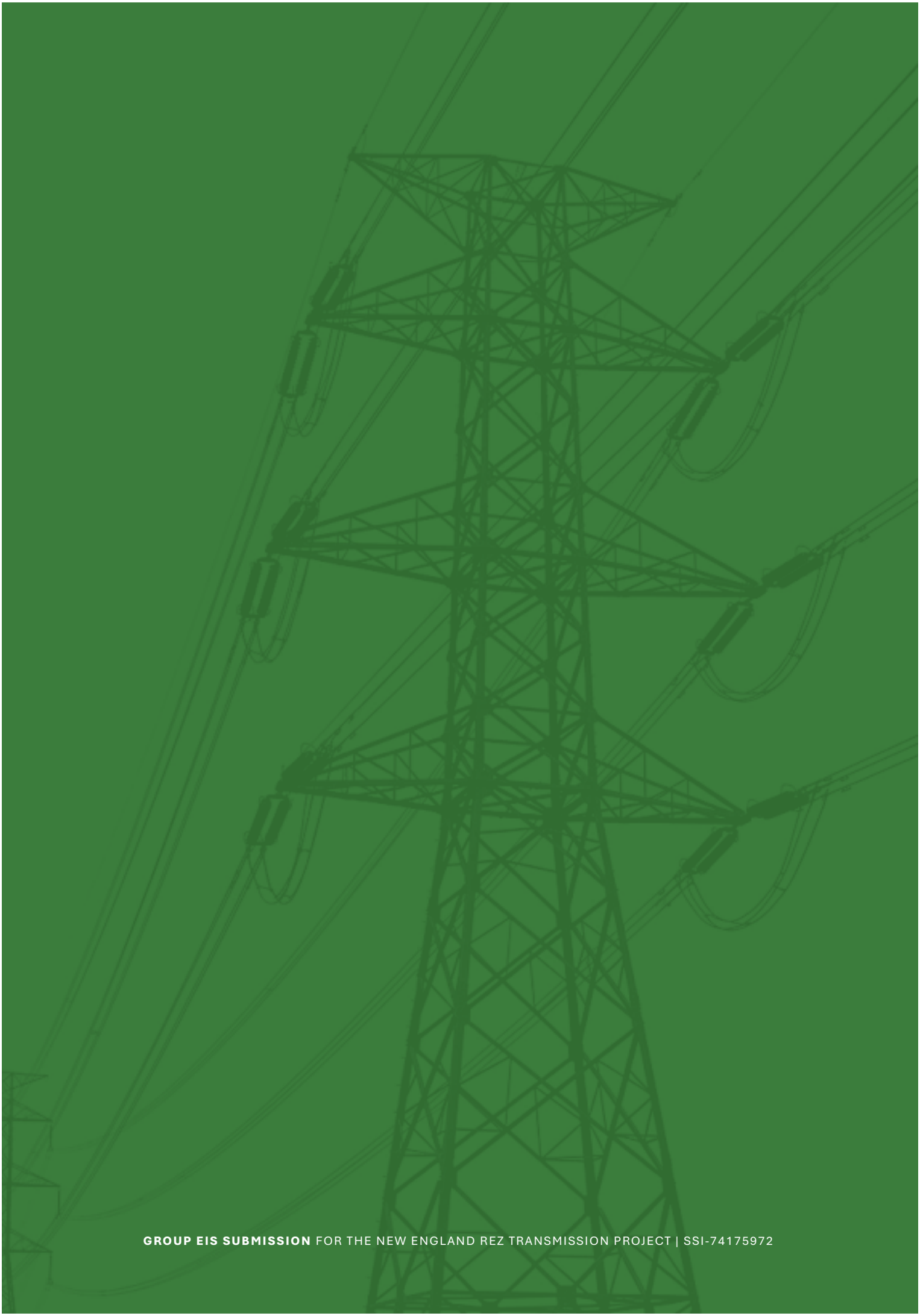

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SECTION 10

Erosion, Sedimentation and Ground Stability

Key issues we have found ...



Erosion hazard results are missing

The EIS describes erosion assessment methods but omits completed hazard maps, soil loss classifications and predicted losses for proposed works.



Steep roads intensify erosion risks

Road cuttings, tower pads, vegetation clearing and redirected drainage concentrate major disturbance on steep land already vulnerable to severe erosion.



Landslide hazards need proper assessment

The EIS fails to demonstrate how roads, tower pads, blasting and drainage works address mapped areas of significant landslide risk.



Runoff damage can cross boundaries

The Olsland case study identifies how steep roads and culverts can concentrate runoff, damaging pasture and soil beyond project easements.



Deferred controls prevent proper scrutiny

Landholders cannot test proposed cuttings, drainage and erosion controls when essential designs and management plans are postponed until after approval.



Prove land protection before approval

EnergyCo must demonstrate protection against lasting land degradation, relocating infrastructure where unacceptable erosion or instability cannot be avoided or controlled.

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> This high rainfall area will require project-specific slope assessment to be completed before assessment

SECTION **10**

Erosion, Sedimentation and Ground Stability

EXECUTIVE SUMMARY

Erosion and ground stability are major environmental and constructability issues for the New England REZ Transmission Project. The project involves extensive vegetation clearing, hundreds of kilometres of access tracks, major cut-and-fill earthworks, tower platforms, excavation, blasting, spoil handling and drainage modification across steep, high-rainfall and erosion-prone country.

The warning signs are already clear. EnergyCo's own A-line methodology shows that steep slopes combined with high rainfall erosivity can produce high erosion hazard. The NSW Land and Soil Capability assessment independently identifies extensive water-erosion and mass-movement limitations along the transmission corridor. At the same time, EnergyCo's constructability work shows that some of the most intensive earthworks will be required in this same steep terrain, including complex tower pads, very steep access tracks, approximately 1.01 million cubic metres of surplus tower-pad material and around 126,000 spoil-truck movements.

Despite this, the erosion and ground-stability assessment requested through the SEARs and agency advice has not been completed or presented to the level necessary to understand the risk. Technical Report 14 says that an erosion-hazard assessment was undertaken, soil-loss classes determined and soil-loss rates estimated, yet the completed project-specific results are not provided in the exhibited EIS.

The concern is therefore not simply that detailed erosion controls will be developed later. The more fundamental issue is that the underlying risk has not yet been properly demonstrated across the full construction footprint, even though the studies that have been completed point to a significant problem.

Before the project is determined, EnergyCo should identify and map the erosion and mass-movement hazards across all disturbed areas, show how the proposed works interact with those hazards, and demonstrate how impacts will be avoided, minimised and mitigated.

The expected outcome should be clear: the project must not leave the land in a worse physical condition than it was before construction began. Where EnergyCo cannot demonstrate that outcome, the infrastructure should not proceed through that location.

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1 | Introduction

The New England REZ Transmission Project involves extensive clearing, access-road construction, cut-and-fill earthworks, tower-platform construction, excavation, blasting, spoil handling and drainage alteration across terrain that includes steep, high-rainfall and erosion-prone country.

This submission is concerned that the assessment needed to properly understand the resulting erosion and ground-stability risk has not been adequately completed or presented, despite the requirements of the SEARs and agency advice. At the same time, the work that has been undertaken is already identifying serious warning signs that need to be understood before decisions are made about where and how this project can be constructed.

2 | Erosion should have been treated as a major risk in its own right

EnergyCo's scoping approach appears to have underestimated the nature of the erosion risk from the outset.

The Revised Scoping Report separated environmental matters into "Key Issues" and "Other Matters". Key Issues were matters where there was a reasonable likelihood of material impact and where detailed assessment was required to fully understand those impacts and develop project-specific mitigation.

Hydrology, water quality and flooding were instead placed in the lower-priority "Other Matters" category, described as matters expected to generate minimal or low impacts and requiring only a standard assessment.

Erosion and sedimentation need to be identified as a Key Issue in their own right.

Erosion is not simply a water-quality issue arising when sediment reaches a creek or river. The primary damage occurs to the land itself. In steep country, erosion can strip topsoil, expose less productive or dispersive subsoil, form rills and gullies, destabilise cut and fill batters, damage pasture, change drainage patterns, undermine tracks and create permanent scars that remain long after construction has finished.

Mass movement is an even more serious manifestation of the same underlying problem. When a slope slips, slumps or fails, the environmental impact is not merely the sediment that may eventually reach a watercourse. The landform itself has been destabilised.

By the time the EIS was prepared, EnergyCo's own environmental risk register had moved substantially from the original scoping position. It identified *"erosion, increased turbidity and sedimentation from vegetation clearing, earthworks, access tracks and other disturbed areas"* as a Medium unmitigated risk and said it would receive detailed assessment.

This detailed assessment cannot be located in the exhibited EIS.

Erosion should have been treated from the outset as a major land, soil and construction risk in its own right, not only a source of downstream sedimentation.

3 | What the SEARs and agency advice required

The Secretary's Environmental Assessment Requirements expressly require

> *"a description of the erosion and sediment control measures that would be implemented to mitigate any impacts in accordance with Managing Urban Stormwater: Soils & Construction (Landcom 2004)."*

The SEARs also require assessment of impacts on soils and land capability and on the quantity and quality of regional surface-water resources.

The EPA's advice was considerably more direct. It specifically requested assessment of soil erosion and sediment transport and of mass movement or landslides. It also required assessment of the effectiveness and reliability of proposed mitigation measures and any residual impacts remaining after those measures were implemented.

The EPA was not merely asking EnergyCo to list standard, generic erosion-control measures. It was asking EnergyCo to assess the risk, assess the proposed response, and identify what impacts would remain.

DCCEEW Water also specifically requested erosion and sediment-control measures.

EnergyCo was therefore clearly on notice that erosion, sediment transport and landslide risk required proper consideration in the EIS.

4 | EnergyCo acknowledges that steep slopes are erosion-sensitive

Technical Report 14 contains an important acknowledgement when describing the Montane water-quality zone:

> *"While water quality in the Montane zone is typically good, it is sensitive to episodic events and land management practices, with impacts often transmitted downstream into the broader Gwydir and Namoi river systems. Key risks include elevated sediment and turbidity from erosion on steep slopes…"*

That statement is directly relevant to the proposed project.

The transmission corridor crosses substantial areas of steep upper-catchment terrain. EnergyCo therefore acknowledges that these slopes are vulnerable to erosion, that erosion can generate substantial sediment and turbidity, and that the consequences can extend well beyond the location where the disturbance occurs.

The same Technical Report identifies erosion hazard as depending on soil characteristics, topography, rainfall intensity and groundcover.

Those are exactly the characteristics that will be altered during construction.

Vegetation and groundcover will be removed. Natural slopes will be cut and benched. Fill will be placed. Drainage will be intercepted and redirected. Roads will concentrate traffic and runoff. Tower pads will create level platforms on natural side slopes. Blasting and rock excavation will occur.

The EIS therefore recognises both the vulnerability of the landscape and the activities capable of triggering erosion within it.

5 | Incomplete erosion hazard assessment

Technical Report 14 sets out a specific method for determining whether a site presents a low or high erosion hazard.

Section 3.5.1.1 states:

> *"The erosion hazard of a site is dependent on a range of factors including soil characteristics, topography, rainfall intensity and groundcover."*

It then explains the preliminary assessment method:

> *"A preliminary method to determine erosion hazard is determined by determining the relationship between the rainfall erosivity (R) and the typical upper slope gradient of the site landform (Landcom, 2004). The rainfall erosivity (R) for the project area is shown on Figure 3.31. The slope gradient will be particular to the specific site and the associated detailed designs. The A-line method is then used (Figure 3.29) to determine if the site is low or high erosion hazard."*

This is a simple two-part test. EnergyCo needs the rainfall erosivity, or R-factor, and the slope gradient. Those two values are then plotted against the A-line to determine whether the location falls within the low or high erosion-hazard area.

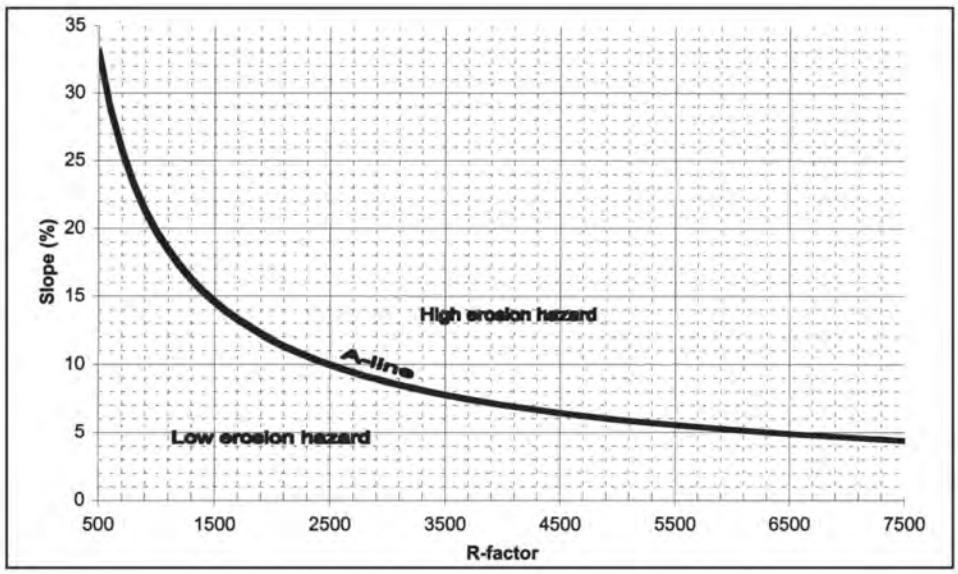


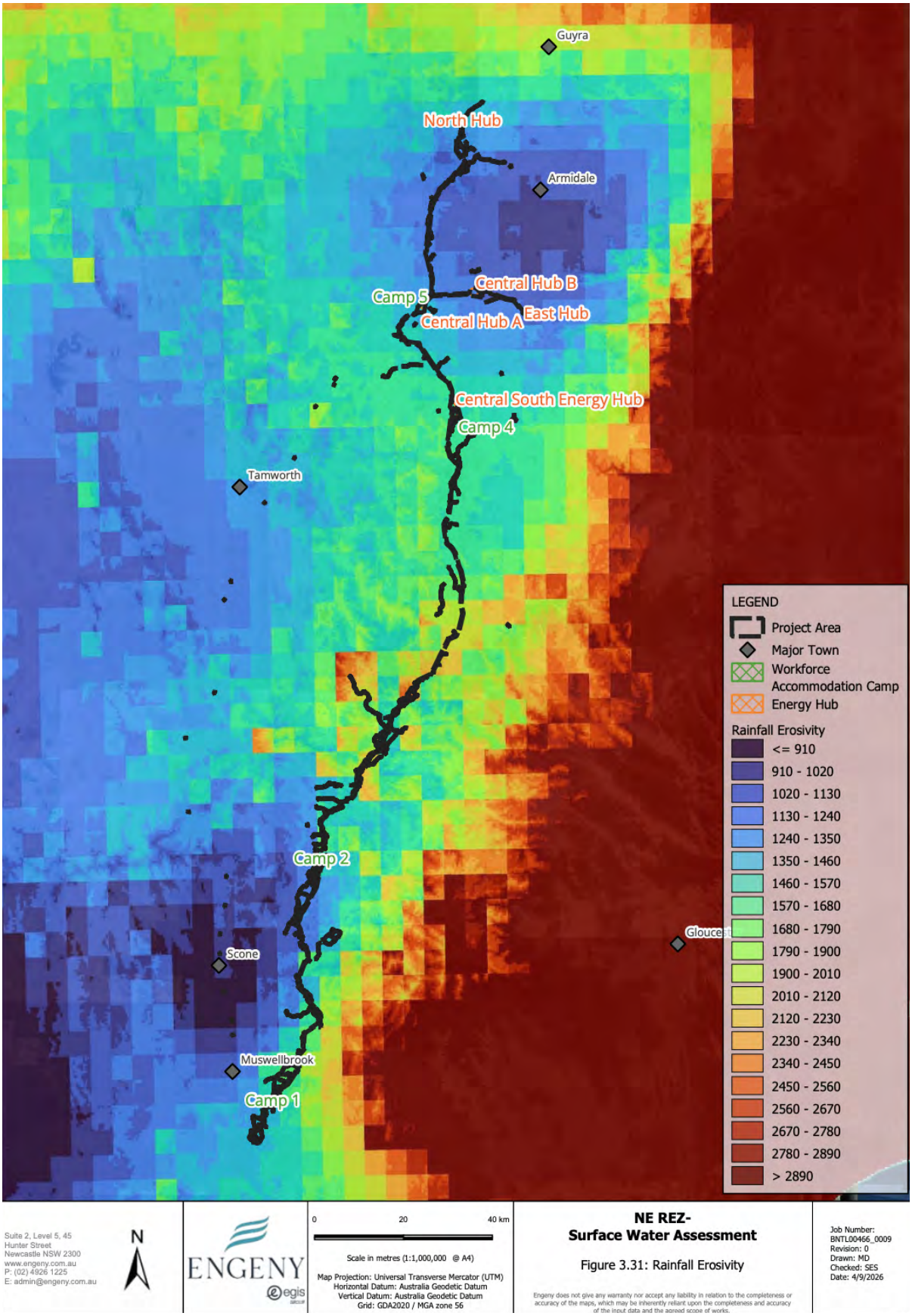
FIGURE 3.29: A-LINE

Source: (Landcom, 2004)

> Figure 1 - Source p76 of the "Blue Book" - https://www.environment.nsw.gov.au/sites/default/files/managing-urban-stormwater-soils-construction-volume-1-fourth-edition.pdf

The graph makes the relationship clear. As rainfall erosivity increases, progressively lower slopes are sufficient to place land within the high erosion-hazard category. Conversely, steep slopes can present a high erosion hazard even at considerably lower R-factors.

This is particularly important for the New England REZ corridor where there are significant areas with steep gradients.



> Figure 3.31 - **maps rainfall erosivity (R-factor) across the project area.**

Figure 3.31 shows that some of the highest rainfall erosivity occurs through elevated range country that is also characterised by steep terrain. Under the A-line method, the combination of increasing slope and high rainfall erosivity moves land into the high erosion-hazard category. This makes completion of the project-specific slope assessment particularly important.

But EnergyCo does not take the next step. There is no project map showing the relevant slope gradient against the R-factor. There is no map identifying which proposed access tracks, tower sites, cuttings or earthworks fall above the A-line. There is no route-wide map of low and high erosion hazard.

Most importantly, the EIS does not show how this assessment has informed the location or design of the proposed works or the measures it will take to minimise and mitigate the impacts.

This is the work that Energy Co have not completed. There is much of the project footprint that sits in the "High Erosion Hazard" category.

Instead, Technical Report 14 states:

> *"The slope gradient will be particular to the specific site and the associated detailed designs."*

Technical Report 14 therefore provides the method and maps the rainfall erosivity, but does not provide the corresponding project-specific slope assessment or the resulting low/high erosion-hazard classification. Nor does it provide the soil-loss classes or estimated soil-loss rates that section 2.3.3.1 says were determined. These are the results needed to understand where the project presents the greatest erosion risk.

All the information is available. We know the transmission route. The R-Values are mapped. We know the gradient.

Why haven't EnergyCo taken the final and critical step of mapping the Erosion Hazard, as defined by the A-Line?



6 | The LSC assessment shows that much of this land has low capability for high-impact disturbance

Further to the erosion risk identified by EnergyCo's A-line method, the NSW Land and Soil Capability assessment provides a separate and independent warning about the ability of this country to withstand high-impact disturbance.

The scheme assesses eight hazards, including water erosion and mass movement – hazards central to risk of erosion.

The LSC scheme states:

> *"The LSC class gives an indication of the land management practices that can be applied to a parcel of land without causing degradation to the land and soil at the site and to the off-site environment."*

It further states:

> *"As land capability decreases, the management of hazards requires an increase in knowledge, expertise and investment. In lands with lower capability, the hazards cannot be managed effectively for some land uses."*

Those statements are directly relevant to this project.

EnergyCo is proposing a high-impact land use. It is proposing vegetation clearing, hundreds of kilometres of access roads, road cuttings, fill batters, tower benches, excavation, blasting, heavy construction traffic and drainage modification. If this land cannot sustain intensive agricultural use without degradation, there is no basis to assume it can sustain far more intensive civil earthworks.

The LSC assessment therefore raises a much more important question than how productive the land may be agriculturally: **does the land have the physical capability to withstand the level of disturbance EnergyCo is proposing without serious degradation?**

For substantial parts of the route, the LSC data indicates that it does not.

Two hazards are particularly important: water erosion and mass movement.

The independent overlay of the NSW Government water-erosion mapping across the published 250 metre transmission corridor identifies approximately **39.5 per cent** of assessed corridor land within water-erosion Classes 6 to 8.

The mass-movement mapping identifies approximately **20 per cent** of assessed corridor land, around 1,501 hectares, within Classes 6 to 8.

> Source: These maps are provided at Appendices A and B.

These figures relate only to the published transmission corridor. They do not include separately mapped access roads or hub sites, even though access-road construction is likely to be one of the most intensive sources of earthworks and slope disturbance.

EnergyCo is proposing some of the most intensive construction activity in the project through country that the LSC scheme identifies as having serious limitations associated with water erosion and slope instability.

In high water-erosion hazard country, disturbance can result in loss of topsoil, exposure of subsoil, gullying, unstable batters, altered drainage, reduced pasture productivity and long-term damage to the land, along with downstream water quality impacts.

In areas of high mass-movement hazard, the risk is more serious again. Road cuttings, fill, tower benches, blasting, excavation and drainage changes can alter the physical conditions that keep slopes stable and increase the potential for slips, slumps and slope failure.

The EPA specifically required assessment of *"Mass movement (landslides)"* in accordance with the Australian Geomechanics Society landslide-risk-management guidelines.

Despite this, the exhibited EIS does not provide a route-wide demonstration of how the mapped water-erosion and mass-movement hazards have influenced the location of access roads, tower sites, major cut-and-fill earthworks, blasting areas or the transmission alignment itself.

This is where the LSC assessment should have fundamentally informed project design.

If land is identified as having low capability for high-impact disturbance because of water erosion or mass movement, the response should not automatically be to engineer a way through it. The first question should be whether that level of disturbance is appropriate in that location at all.

EnergyCo has relied on LSC elsewhere in the EIS. It should therefore also acknowledge what the same assessment says about the physical limits of the country being disturbed. It is unclear why EnergyCo provided this assessment in the agriculture technical report, and not a technical report on erosion.

The LSC data is a warning that parts of this landscape have limited capability to withstand high-impact disturbance without degradation.

For a project proposing major earthworks through that landscape, that warning should be central to route selection, access design and the decision about whether particular areas should be disturbed at all.

7 | Access roads concentrate high-impact construction in difficult and vulnerable terrain

The erosion risk cannot be separated from the extraordinary scale of access-road and tower-pad construction required by this project. This is not simply a transmission-line project with incidental access tracks. It contains a very large civil road and earthworks project within it.

The exhibited EIS describes approximately 580 kilometres of access tracks. EnergyCo's earlier *Bulk Corridor Design Refinement Report*, November 2025, identified approximately 57 kilometres of access tracks above an 18 per cent gradient, including approximately 28 kilometres exceeding 21 per cent. Around 97 tower sites were to be serviced by tracks exceeding an 18 per cent grade, while 116 towers required complex Type C tower-pad construction associated with very steep terrain.

The same constructability assessment estimated approximately 1.01 million cubic metres of surplus material from tower-pad earthworks, together with approximately 126,000 spoil-truck movements.

In flatter agricultural country, existing roads and farm tracks are more common and can often be upgraded with comparatively limited earthworks. In the steepest country, substantial existing access is often absent for a simple practical reason: constructing and maintaining roads through that terrain is difficult.

Where small farm tracks exist, they are often not capable of carrying the cranes, drilling rigs, concrete trucks, heavy excavation equipment and other machinery required for construction of 500 kV transmission infrastructure.



> Figure 4 - **Crawny Road**

To create that access, roads must be benched into hillsides, slopes cut back, fill placed to create workable platforms, batters formed and stabilised, drainage redirected and, in some locations, rock excavated or blasted. Tower pads themselves require substantial cutting and filling to create level working areas on steep natural slopes.

The project therefore faces a compounding problem. The harder a tower site is to reach, the greater the road construction required to reach it. The steeper the tower site, the greater the cutting and filling required to establish a workable tower pad. And the country requiring the greatest disturbance is also the country that the A-line assessment and LSC mapping identify as most susceptible to erosion and mass movement.

This is the central concern.

The approximately **1.01 million cubic metres of surplus tower-pad material** will not be generated evenly across the landscape. A large proportion of that material is likely to arise from the steepest sites, where the natural landform must be most heavily modified to create roads and level construction platforms.

Likewise, the approximately **126,000 spoil-truck movements** are evidence of the enormous volume of soil and rock that must be excavated, handled, transported and placed elsewhere.

That means some of the most intensive earthmoving in the entire project will occur in the terrain already showing the strongest warning signs for erosion and slope instability.

EnergyCo's own A-line methodology shows that steep slopes combined with high rainfall erosivity can produce high erosion hazard. The NSW Land and Soil Capability mapping separately identifies substantial water-erosion and mass-movement limitations through this same broad landscape.

The project is therefore concentrating its greatest physical disturbance in the country least able to tolerate that disturbance.

That relationship should have been front and centre in the erosion assessment.

Instead, the EIS does not provide a completed project-specific erosion-hazard assessment showing where the steep access tracks, tower pads and major cut-and-fill areas overlap the highest erosion and mass-movement hazards.

The people who work this country every day understand the practical implications of that omission. They know where machinery can travel after prolonged rain, where tracks become impassable, where hillsides slip, where water concentrates and where even ordinary agricultural machinery cannot safely operate. They know that this creates months of work stoppages, or instances where projects should not start at all.

For some locations, constructing a road capable of carrying cranes and other major construction equipment may be technically achievable. But "technically achievable" is not the end of the question.

At what financial cost? At what level of excavation, cutting and filling? At what level of blasting? At what cost to the slope itself? At what ongoing maintenance burden? And at what point does engineering a way through unsuitable terrain cease to be a reasonable environmental outcome?

Building heavy-vehicle access through this country may be technically possible. That does not make it environmentally acceptable.

The EIS needs to demonstrate not merely that access can be engineered, but what must be done to the country to create that access, what erosion and stability risks that work creates, and whether some locations should be avoided altogether.

8 | Reliance on future erosion and sediment control plans removes meaningful community scrutiny

The principal response to erosion risk in Technical Report 14 is the future preparation of area-specific Erosion and Sediment Control Plans.

Section 5.5.4 states that these plans will be prepared generally in accordance with the Blue Book and will consider the erosion hazard at each location. Typical controls include limiting disturbance, diverting clean runoff, sediment traps, stabilisation, progressive rehabilitation, stockpile management, drainage controls, monitoring and maintenance.

These are standard generic erosion-control measures. Their effectiveness depends entirely on the site.

A sediment-control approach that may be adequate on gently sloping stable ground cannot simply be assumed to work on steep, high-rainfall country involving major cut-and-fill earthworks, blasting and unstable batters.

This is also a procedural issue.

Public exhibition of the EIS is the principal opportunity for affected landholders, local communities and councils to understand the proposed impacts and respond before the project is determined.

People need to be able to see where roads will be cut, where batters will be formed, where blasting may occur, how drainage will be redirected, where spoil will be placed and what measures are proposed to prevent permanent damage to the land.

Only then can they provide meaningful local evidence about whether those measures are realistic.

Local landholders often have decades of practical experience with particular slopes. They know where water runs after prolonged rain. They know where tracks fail. They know where slips occur. They know where machinery can and cannot safely travel. They know which areas remain wet, which soils disperse and where erosion begins once protective groundcover is removed.

That knowledge cannot inform the EIS if the relevant roads, cuttings, drainage arrangements and erosion controls are not designed until after the project has been approved.

Deferring these matters to detailed design removes much of the community's opportunity to scrutinise and respond to the impacts that will occur on their land.

By that point, the debate has shifted from whether the disturbance should occur to how an approved project will be constructed.

That is too late.

The EIS should contain enough design and assessment detail for affected communities to understand what is proposed, identify where the assumptions are wrong and provide informed local evidence before determination.

9 | What is required

Before this project is determined, EnergyCo should provide a complete, project-specific erosion and ground-stability assessment for the full construction footprint.

That assessment should clearly identify and map the areas of highest water-erosion and mass-movement risk, including the transmission corridor, access tracks, tower sites, cut-and-fill areas, blasting locations, drainage works, hubs and other disturbed areas. It should show how those hazards interact with the actual proposed construction works, what impacts are likely to occur, and which locations present unacceptable levels of risk.

EnergyCo should then demonstrate how those impacts will be avoided, minimised and mitigated, including where route changes or relocation of infrastructure are necessary because the land is not capable of safely withstanding the proposed disturbance.

The assessment should be sufficiently complete and publicly available before determination so that affected landholders, communities and councils can understand what is proposed, assess the likely impacts on the land, and provide meaningful local knowledge in response.

The expected outcome should be clear. Land affected by the project must not be left in a worse physical condition than it was before construction began. Where EnergyCo cannot demonstrate that outcome, the infrastructure should not proceed through that location.

Conclusion

The studies already undertaken point consistently to a serious erosion and ground-stability risk. EnergyCo's A-line methodology identifies the danger created by the combination of steep slopes and high rainfall erosivity. The NSW Land and Soil Capability assessment independently identifies extensive water-erosion and mass-movement limitations. EnergyCo's constructability work then shows that some of the greatest cut-and-fill disturbance will occur in this same steep and vulnerable country.

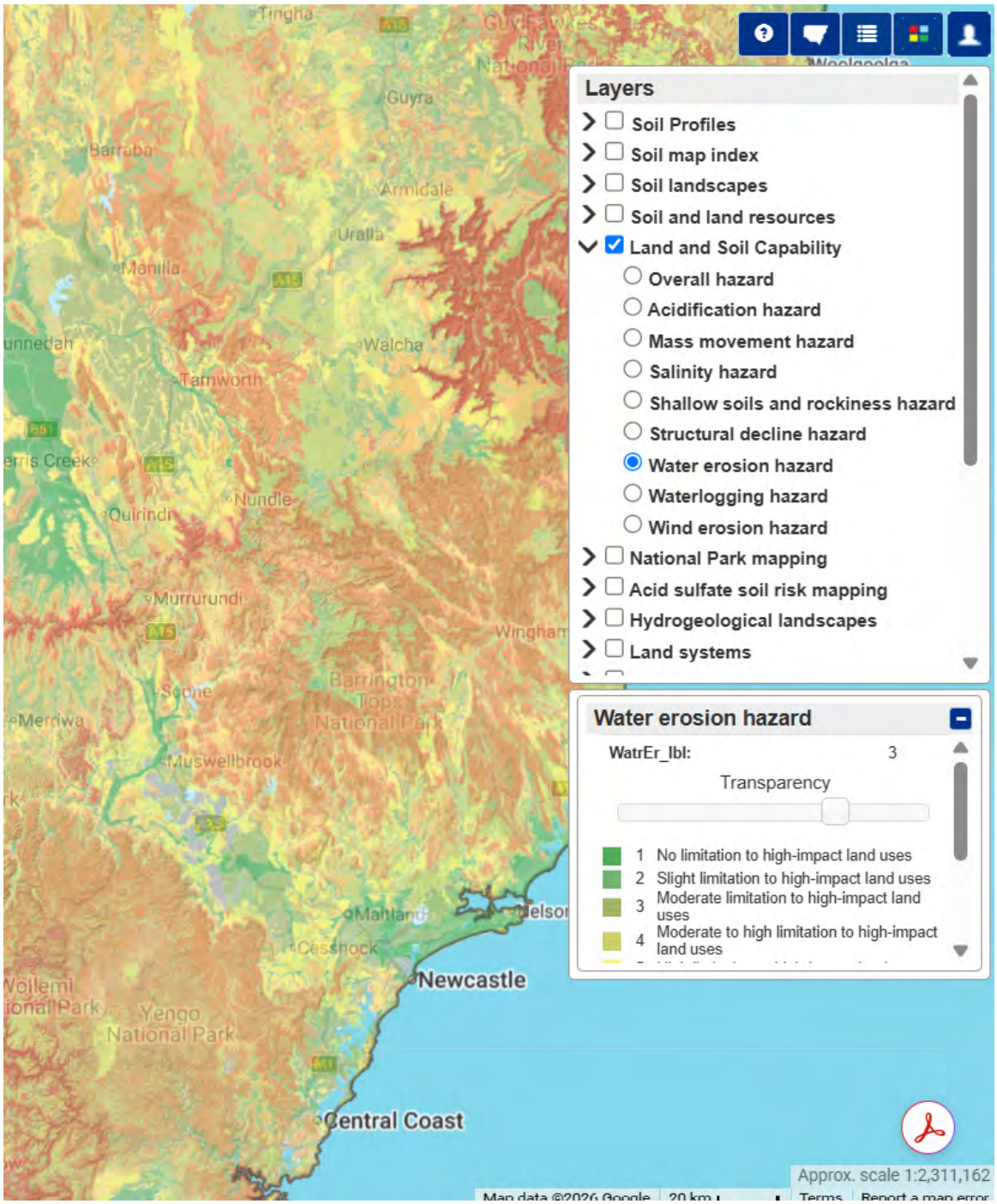
Yet the assessment requested through the SEARs and agency advice has not been completed or presented to the level necessary to understand that risk. The exhibited EIS does not provide the completed project-specific erosion-hazard assessment, soil-loss classes or estimated soil-loss rates referred to in Technical Report 14, nor does it show across the full construction footprint how the identified hazards interact with the proposed roads, tower pads, cut-and-fill areas and other major earthworks.

These warning signs cannot simply be disregarded or deferred to detailed design. The erosion and ground-stability risk needs to be properly understood first. EnergyCo must then demonstrate how the project can be constructed without causing serious and long-term damage, how impacts will be avoided or minimised, and where the route or infrastructure must change because the land cannot safely withstand the proposed disturbance.

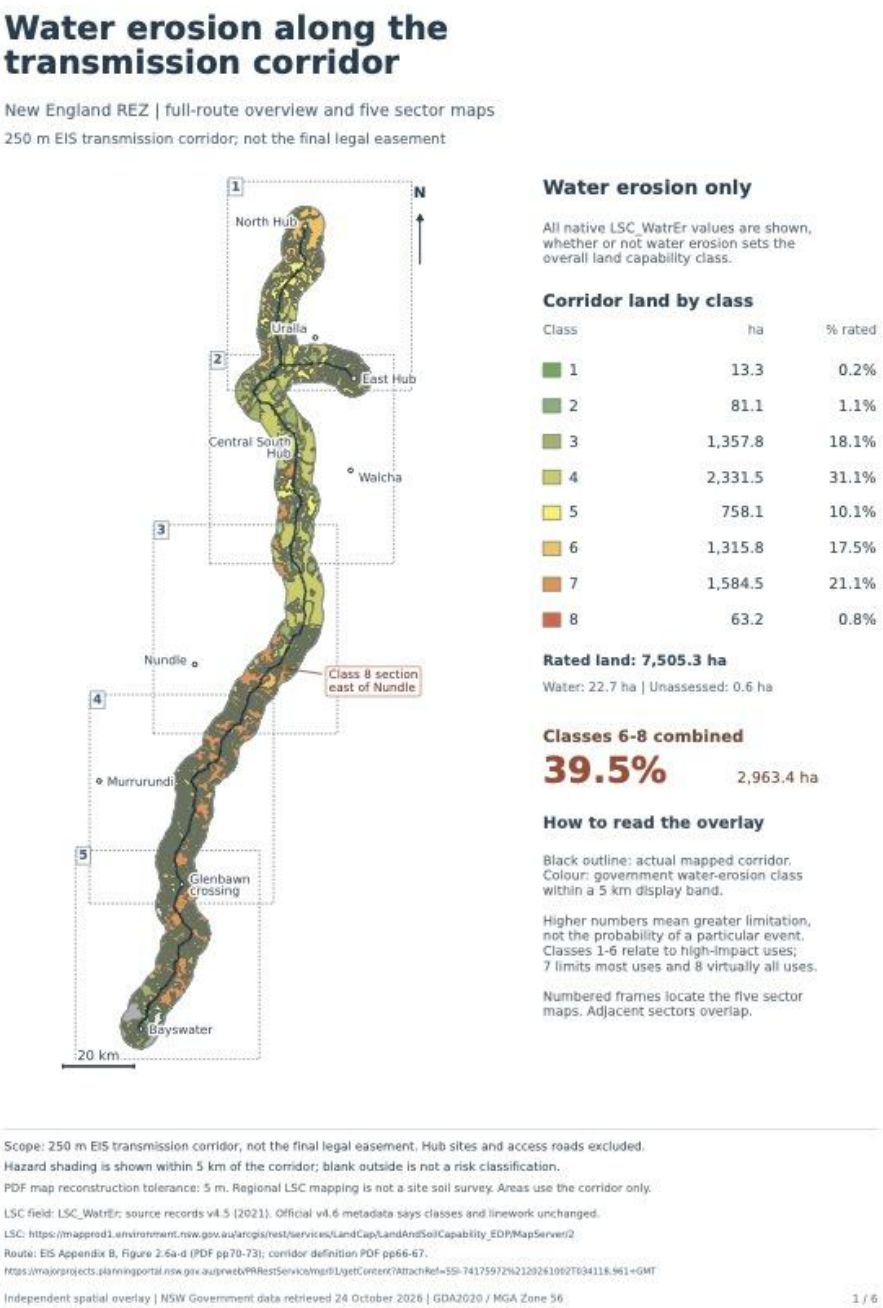
The community is not asking for an unreasonable standard. It is asking that the assessment work requested by the relevant agencies be completed, that the risks already identified in EnergyCo's own studies be taken seriously, and that the country not be left in a worse physical condition than it was before construction began.

That must be the test for this project. Where EnergyCo cannot demonstrate, before determination, that the land will not be left more eroded, less stable or permanently degraded, the infrastructure should not proceed through that location.

APPENDIX **A**
Land and Soil Capability (LSC) Water erosion hazard along the transmission corridor



> Figure 3 - **LSC Water Erosion hazard across region**



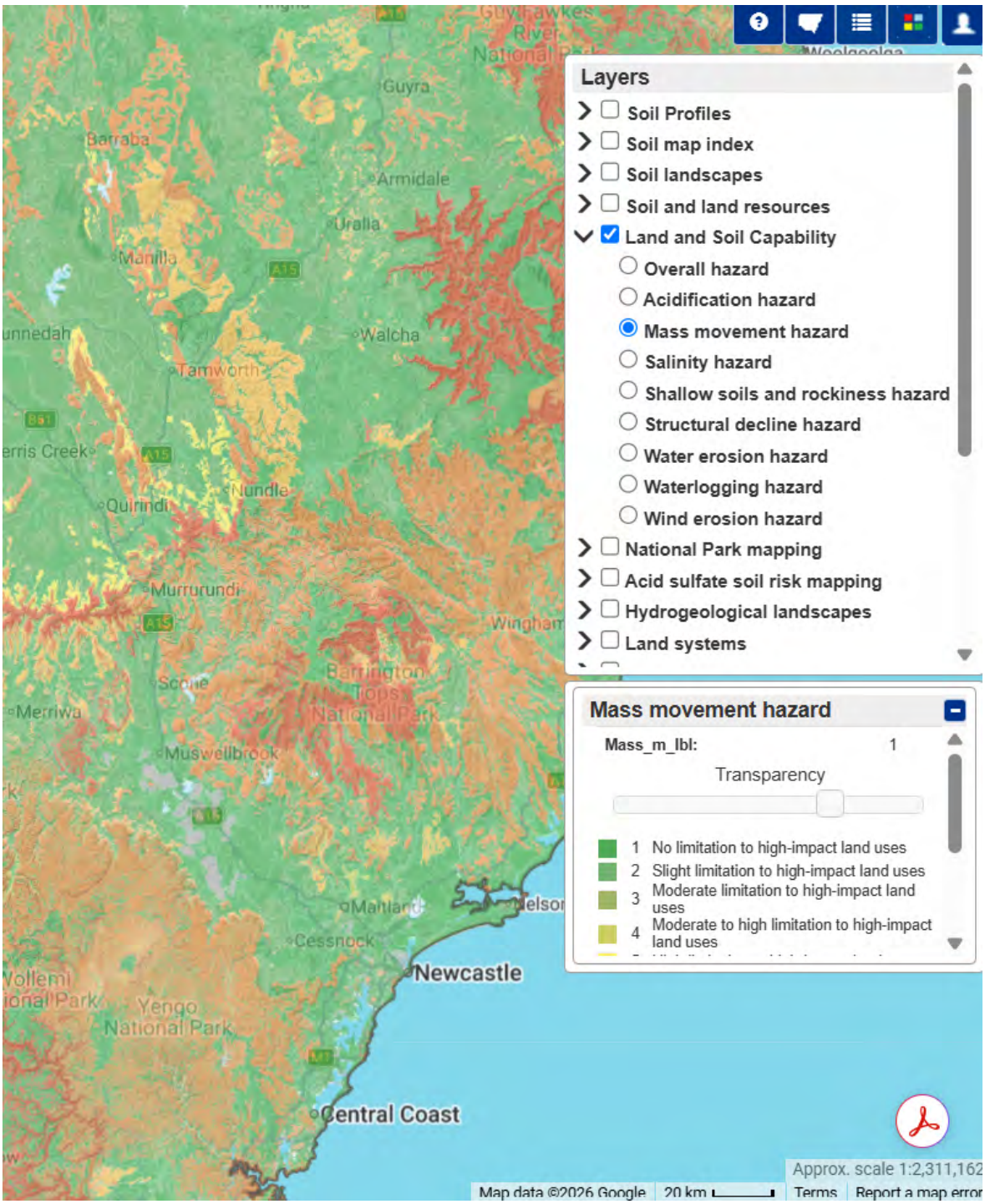
> Figure 4 - **LSC Water Erosion hazard along transmission corridor**

The map shows the NSW Government LSC water-erosion hazard along the published 250 metre EIS transmission corridor. It identifies approximately 39.5 per cent of assessed corridor land within water-erosion Classes 6 to 8.

Source: espade.environment.nsw.gov.au Layer – Land and Soils Capability – Water erosion hazard

The map relates only to the published transmission corridor and excludes separately mapped access roads and hub sites.

APPENDIX **B**
Land and Soil Capability (LSC) Mass movement hazard along the transmission corridor



> Figure 2 L - **SC Mass movement hazard across region**



> Figure 3 - **LSC Mass movement hazard along transmission line**

The map shows the NSW Government LSC mass-movement hazard along the published 250 metre EIS transmission corridor. It identifies approximately 20 per cent of assessed corridor land within mass-movement Classes 6 to 8.

Source: espade.environment.nsw.gov.au Layer – Land and Soils Capability – Mass movement hazard

The map relates only to the published transmission corridor and excludes separately mapped access roads and hub sites.

SECTION 11

Impacts on Farming and Farming Practices

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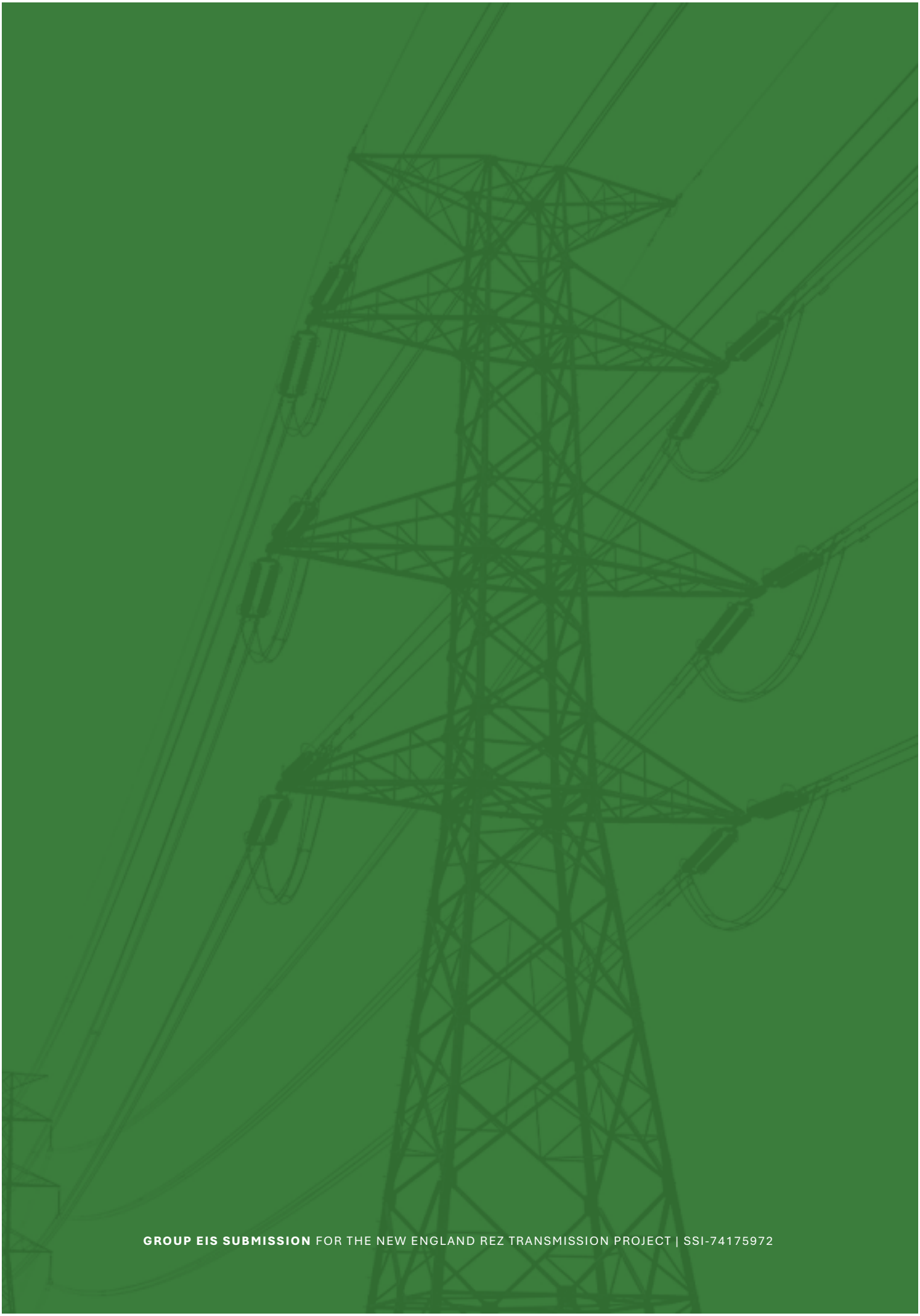

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SECTION 11

Impacts on Farming and Farming Practices

Key issues we have found ...

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

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

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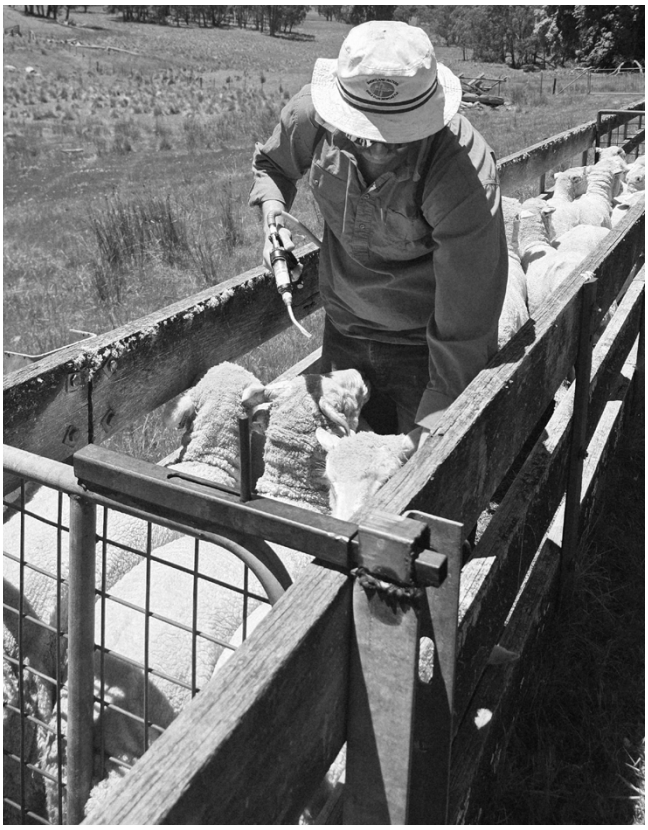



SECTION **11**

Impacts on Farming and Farming Practices

EXECUTIVE SUMMARY

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

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

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

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

The EIS concedes two productivity pathways and costs neither.

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

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

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

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

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

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

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

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

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

What we ask:

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

Every one of these asks serves a single condition.

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

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1 | Significant Undervaluation of Grazing Production

1.1 Evidence

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

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

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

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

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

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

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

1.2 EIS shortcoming

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

1.3 Consequences

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

> POSITION SOUGHT

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



2 | Severance of Working Properties

2.1 Evidence

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

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

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

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

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

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

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

2.2 EIS shortcoming

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

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

2.3 Consequences

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

> POSITION SOUGHT

Specific protection and more work.

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



3 | Loss of Access to Aerially-Maintained Country

3.1 Evidence

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

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

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

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

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

3.2 EIS shortcoming

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

3.3 Consequences

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

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

> POSITION SOUGHT

More work and specific protection.

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



4 | Biosecurity and Weed Spread

4.1 Evidence

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

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

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

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

4.2 EIS shortcoming

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

4.3 Consequences

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

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

> POSITION SOUGHT

Specific protection.
Require …

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

5 | Weather Constructability

5.1 Why this sub-section matters

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

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

5.2 Evidence: what the EIS contains

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

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

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

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

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

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

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

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

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

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

5.3 EIS shortcomings

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

5.4 Evidence: local weather station data

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

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

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

> Table 8 - **Source stations**

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

Rainfall: the daily wet-day record

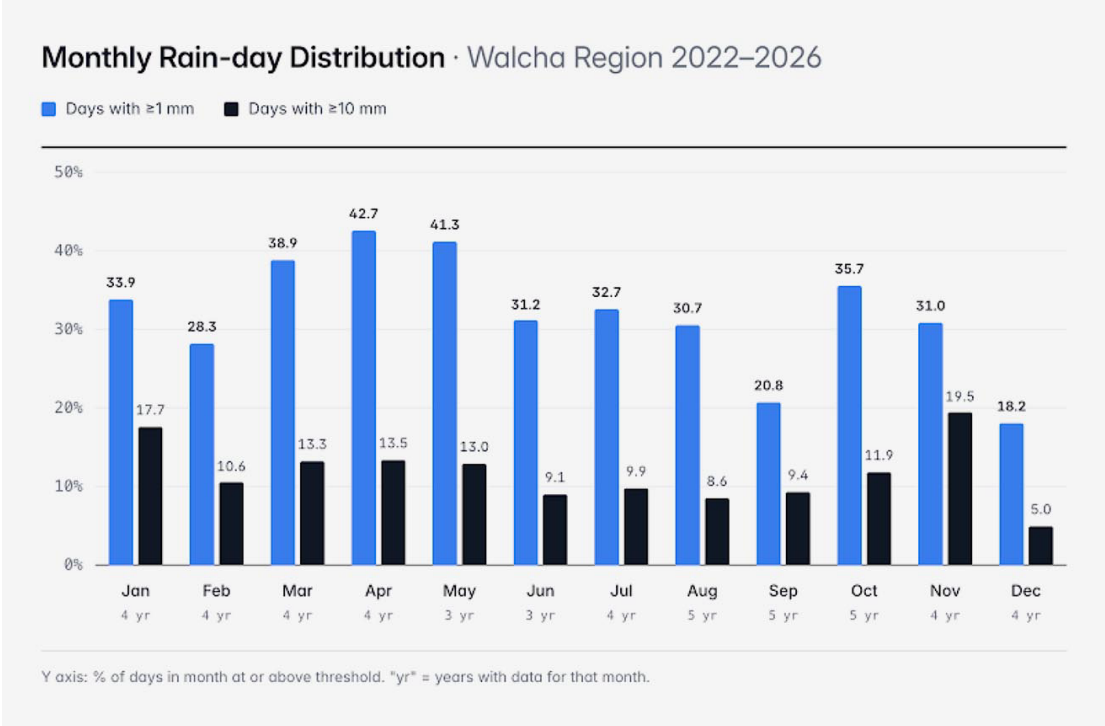
The local weather station on the flat, protected site is the only multi-year, daily-resolution rainfall record placed before this assessment. TR16 gives monthly and annual totals. It does not give rain days, consecutive wet days or wet-spell frequency, which are the figures a workable-day calendar needs.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

Weather Station Statistics · Walcha Region 2022-2026

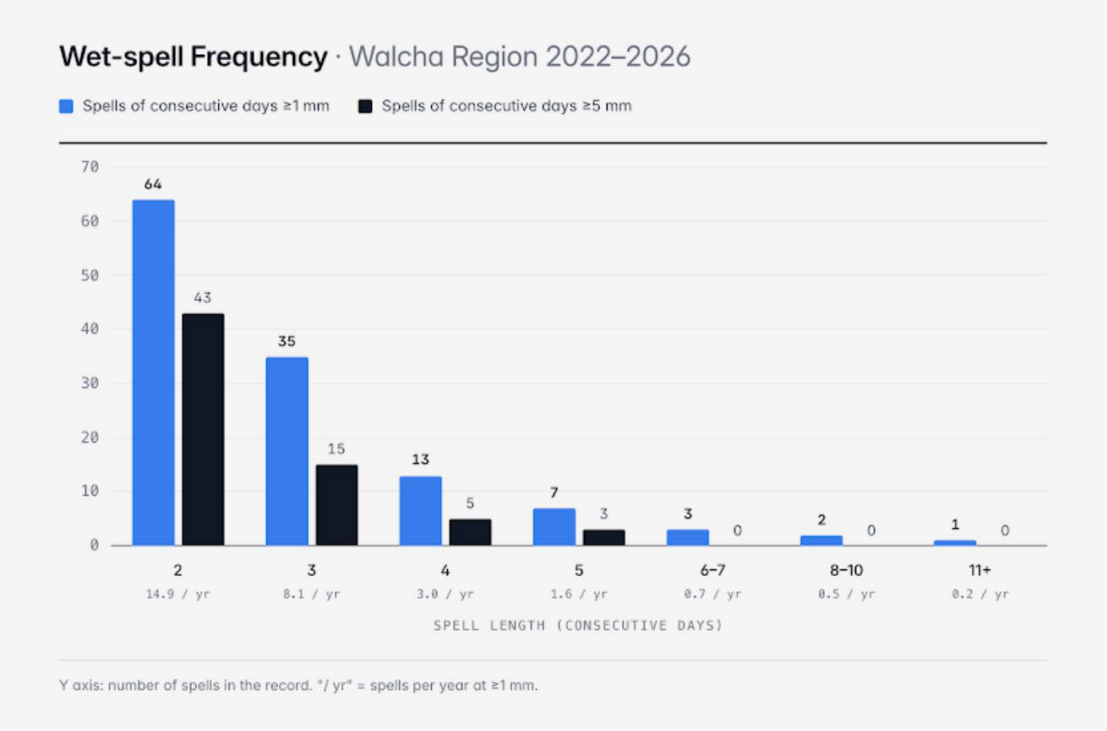
STATISTIC	VALUE
Days in record used / days with data	**1,382 days** with rainfall data, of 1,572 calendar days in the range (87.9%)
Days with ≥1 mm rain	**436 days** · 31.5%
Days with ≥5 mm rain	**252 days** · 18.2%
Days with ≥10 mm rain	**162 days** · 11.7%
Mean annual rainfall and range across years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

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

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



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



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

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

Wind: the exposed-hilltop record

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

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

Wind Threshold Ladder · Walcha Region 2022-2026

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

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

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

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

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

5.5 Consequences

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

> POSITION SOUGHT

More work, then specific protection.

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

6 | Electromagnetic Fields, Telecommunications and Agricultural Operations

6.1 Evidence

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

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

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

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

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

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

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

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

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

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

6.2 EIS shortcoming

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

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

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

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

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

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

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

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

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

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

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

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

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

6.3 Consequences

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

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

> POSITION SOUGHT

More work, then specific protection.

The Department should require, before determination:

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

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

7.1 Evidence

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

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

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

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

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

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

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

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

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

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

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

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

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

7.2 EIS shortcoming

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

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

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

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

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

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

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

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

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

7.3 Consequences

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

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

> POSITION SOUGHT

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

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

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

8 | An Incomplete EIS

8.1 Evidence: the consultation record and the country not examined

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

8.3 What the EIS never assessed

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

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

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

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

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

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

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

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

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

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

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

8.4 The community record and the Position Sought

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

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

> POSITION SOUGHT

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

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

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



Sources

EIS (primary)

1. EnergyCo, *New England REZ Network Infrastructure Project, Environmental Impact Statement*, SSI-74175972, first published October 2026, ISBN 978-1-86516-049-8 (889 pp.). Chapters cited: Ch 3 (§§3.2, 3.3.2, 3.3.3, 3.3.4, 3.3.8; Table 3.2; Table 3.9; pp. 68–69, 100–107, 125–126); Ch 6 (§6.3, pp. 211–212); Ch 10 (§10.3.1, Table 10.6, p. 397); Ch 12 (§§12.2.2, 12.3.1, 12.3.2, 12.3.3, 12.4.2, 12.5; pp. 471, 495–497, 504–505, 508); Ch 13 (§§13.3.1, 13.3.5, 13.7; pp. 528–543); Ch 14 (§14.3.5, Table 14.7; pp. 564, 573); Ch 15 (§15.2.2, p. 580; §15.2, pp. 575–595); Ch 17 (§§17.2, 17.3, Table 17.7; pp. 655–669); Ch 18 (§18.3.4, pp. 683–693); Ch 20 (§20.2.1, p. 725); Ch 23 (§23.3.1, Table 23.2, pp. 765–766); Ch 25 (§25.2.1, p. 820); Ch 26 (§26.4.2, p. 836); References (pp. 844–845).
2. EnergyCo, New England REZ Network Infrastructure Project, EIS Technical Report 6: Agriculture, Agricultural Impact Assessment, Tremain Ivey Advisory (Peter Tremain), 7 September 2026, 77 pp. Sections cited: §§1.4, 2.2, 3.3.1, 3.4.1, 4.2.1–4.2.3, 5.6, 6.1.1, 6.2, 6.7 (printed pp. 4, 24, 27–28, 37–39, 42–45, 54, 60–61, 64); Tables 3-1, 4-9 (reproduced in the EIS main volume as Table 13.1) and 4-10 to 4-14 (printed pp. 42–45).
3. EnergyCo, New England REZ Network Infrastructure Project, EIS Technical Report 13: Electric and Magnetic Field Study (including Telecommunications), Aurecon Australasia Pty Ltd for Energy Corporation of NSW, Reference 522209, Final, 28 September 2026, 93 pp. Sections cited: §§1.3–1.4, 2.2–2.3, 3.2–3.3, 4.4, 7.1–7.3, 8.1; Executive Summary (p. III) and Attachment B (printed pp. 18–28, 38–39, 72–74; Attachment B p. 0).
4. Aurecon Australasia Pty Ltd (2026), Technical Report 16: Groundwater Impact Assessment. New England REZ Network Infrastructure Project EIS (Project No. P522209, Revision Final, 28 September 2026), prepared for Energy Corporation of NSW (EnergyCo), Sydney. Section cited: §4 (pp. 25–26, 35).

Independent EIS Research (secondary)

5. Wyoming Digital research, *NEREZ EIS Ready-Reckoner* (Notion database, 96 page-referenced EIS claims), 22 Oct 2026. Rows cited: Topic 11 (Farming and property impacts) and cross-referenced Topics 2, 6, 12, 13.
6. Wyoming Digital research, *EIS Weather and Climate Data Source Verification*, 22 Oct 2026. Page-referenced findings only; quantified projections in that report are not relied on.
7. Wyoming Digital research, *Construction Productivity Evidence Pack* (Theme 2), 20 Oct 2026. Used for industry context and statutory frameworks only.
8. Wyoming Digital research, DPI and MLA benchmark verification of local agronomic grazing productivity figures, 21 Oct 2026.

EnergyCo associated studies (secondary citation)

9. EnergyCo Regional Water and Wastewater Cumulative Assessment Study, Table 5-11, p. 101, as reported in Voice for Walcha, Reassessing the REZ (v5 Final, July 2026).

Published agricultural research

10. Curll, M.L. (1977a) Superphosphate on perennial pastures. I. Effects of a pasture response on sheep production. Australian Journal of Agricultural Research, 28(6), 991–1005. https://doi.org/10.1071/ar9770991

11. Curll, M.L. (1977b) Superphosphate on perennial pastures. II. Effects of a pasture response on steer beef production. Australian Journal of Agricultural Research, 28(6), 1007–1014. https://doi.org/10.1071/ar9771007

12. Ayres, J.F., McFarlane, J.D., Osborne, G.J., and Corbin, E.J. (1977) Superphosphate requirements of clover-ley farming. II. The residual effects of topdressing. Australian Journal of Agricultural Research, 28(2), 287–299. https://doi.org/10.1071/ar9770287

13. Wolfe, E.C. and Lazenby, A. (1973) Grass-white clover relationships during pasture development. 1. Effect of superphosphate. Australian Journal of Experimental Agriculture and Animal Husbandry, 13(64), 567–574. https://doi.org/10.1071/ea9730567

14. Simpson, R.J., Richardson, A.E., Nichols, S.N., and Crush, J.R. (2014) Pasture plants and soil fertility management to improve the efficiency of phosphorus fertiliser use in temperate grassland systems. Crop & Pasture Science, 65(6), 556–575. https://doi.org/10.1071/cp13395

15. Lazenby, A. and Lovett, J.V. (1975) Growth of pasture species on the Northern Tablelands of New South Wales. Australian Journal of Agricultural Research, 26(2), 269–280. https://doi.org/10.1071/ar9750267

16. McDonald, G.T. (1968) Recent pasture development on the Northern Tablelands of New South Wales. Australian Geographer, 10(5), 382–391. https://doi.org/10.1080/00049186808702504

17. Robinson, G.G. and Lazenby, A. (1976) Effect of superphosphate, white clover and stocking rate on the productivity of natural pastures, Northern Tablelands, New South Wales. Australian Journal of Experimental Agriculture, 16(79), 209–217. https://doi.org/10.1071/ea9760209

18. NSW Department of Primary Industries (DPI / DPIRD). PROGRAZE: Profitable, Sustainable Grazing / Pasture Assessment and Livestock Production: Northern Tablelands and Slopes Advisory Series (incorporating Primefact 875/876: Stocking rates and carrying capacity). NSW Department of Primary Industries, Orange/Armidale, NSW. https://www.dpi.nsw.gov.au/agriculture/pastures-and-rangelands

19. NSW Agriculture / NSW DPI. Pastures for the Northern Tablelands: Species, Establishment and Management, Agfact P2.5.34 (compiled by Robinson, G.G., McGufficke, P., and Simpson, P.). NSW Agriculture, Orange/Armidale, NSW. https://www.dpi.nsw.gov.au/agriculture/pastures-and-rangelands/pasture-mix/suggested-pasture-mixtures-for-the-northern-tablelands

20. Meat & Livestock Australia (MLA) (2021) More Beef from Pastures: The Producer's Manual (Southern and Northern Tablelands High Rainfall Pasture Modules). Meat & Livestock Australia, North Sydney, NSW. https://www.mla.com.au/extension-training-and-tools/more-beef-from-pastures/

Climate and market data

21. Australian Energy Market Operator (AEMO), 2026 Integrated System Plan for the National Electricity Market (June 2026), Section 4.1, p. 82 (and Tables 1, 7, 8 & 9). https://www.aemo.com.au/energy-systems/major-publications/integrated-system-plan-isp/2026-integrated-system-plan-isp, accessed 28 Oct 2026.

22. CSIRO (2026) GenCost 2025–26: Final Report (prepared by Graham, P. and Hayward, J.). Commonwealth Scientific and Industrial Research Organisation, Canberra.

23. Australian Bureau of Statistics (ABS) (2022) Agricultural Commodities, Australia, 2020–21 Financial Year (Cat. 7121.0). ABS, Canberra. https://www.abs.gov.au/statistics/industry/agriculture/agricultural-commodities-australia/2020-21

24. Australian Bureau of Statistics (ABS) (2022) Value of Agricultural Commodities Produced, Australia, 2020–21 Financial Year (Cat. 7503.0). ABS, Canberra. https://www.abs.gov.au/statistics/industry/agriculture/value-agricultural-commodities-produced-australia/2020-21

25. Australian Bureau of Statistics (ABS) (2022) 2021 Census of Population and Housing: General Community Profile & QuickStats (Walcha LGA, Code LGA17850). ABS, Canberra. https://www.abs.gov.au/census/find-census-data/quickstats/2021/LGA17850

26. Policy Institute of Australia (PIA) (2026) Megaproject Transmission Cost Overruns and Retail Electricity Price Impacts. Policy Institute of Australia, Sydney (as cited in Voice for Walcha, Reassessing the REZ, v5 Final, July 2026).

Bureau and land-systems data

27. Bureau of Meteorology (BOM). Climate Data Online: Historical Weather Observations and Rainfall Station Records. Commonwealth of Australia, Bureau of Meteorology, Melbourne. Stations used: Scone SES [061089] (mean annual rainfall 612 mm); Muswellbrook Bridge St / Lower Hill St [061053 / 061198] (643 mm); Jerrys Plains Post Office [061026] (645 mm); Walcha Post Office [056037] (808 mm); Nowendoc Post Office [060024] (1,025 mm). http://www.bom.gov.au/climate/data/

28. Kovac, M. and Lawrie, J.W. (1991) Soil Landscapes of the Singleton 1:250,000 Sheet. Soil Conservation Service of NSW, Sydney / NSW Department of Climate Change, Energy, the Environment and Water (eSPADE SALIS). https://espade.environment.nsw.gov.au/

29. NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW). Soil Landscapes of the Tamworth 1:100,000 Sheet & Armidale 1:100,000 Sheet. NSW Soil and Land Information System (SALIS / eSPADE), Sydney. https://espade.environment.nsw.gov.au/

Media and public record

30. Plevey, T. (2026) "New England residents face 29-day deadline to digest 16,000-page EnergyCo document." The Armidale Express, 15 October 2026 (updated 16 October 2026). https://www.armidaleexpress.com.au/story/9369424/new-england-residents-given-only-29-days-to-read-massive-eis/

31. The Armidale Express (2026) "Anna Young, farmers sue NSW over $20 billion REZ validity." The Armidale Express (syndicated across Moree Champion and Tenterfield Star), 7 September 2026. https://www.armidaleexpress.com.au/story/9345697/anna-young-farmers-sue-nsw-over-20-billion-rez-validity/

Community and landholder data

32. Damien Timbs - Productive Pastoral Solutions, Walcha. Agronomic data and worked-example figures.

33. Local weather station (flat protected site), daily rainfall log, 3 Jul 2022 – 21 Oct 2026. Extracted 22 Oct 2026; 1,382 daily records (87.9% of calendar days in the range).

34. Local weather station (exposed hilltop site), daily wind log, 13 Oct 2021 – 21 Oct 2026. Extracted 22 Oct 2026; 1,622 daily records (88.4% of calendar days in the range).

Statutory

35. *Land Acquisition (Just Terms Compensation) Act 1991* (NSW).

36. NSW Strategic Benefit Payments Scheme for transmission hosts.

Government agency advice

37. NSW Department of Primary Industries and Regional Development, Advice on SEARs – DPIRD Agriculture (Reference OUT24/12198), Helen Willis, Agricultural Land Use Planning Officer, 13 August 2024, p. 1. Submitted via the NSW Planning Portal for SSI-74175972.

38. NSW Department of Primary Industries, NSW WeedWise: Chilean needle grass (Nassella neesiana). https://weeds.dpi.nsw.gov.au/Weed/ChileanNeedleGrass

39. CRC for Australian Weed Management / Weeds of National Significance, Serrated Tussock Management Guide; NSW Department of Primary Industries, NSW WeedWise: Serrated tussock (Nassella trichotoma). https://weeds.dpi.nsw.gov.au/Weed/SerratedTussock

40. NSW Department of Primary Industries, NSW WeedWise: St. John's wort (Hypericum perforatum). https://weeds.dpi.nsw.gov.au/Weed/StJohnsWort

41. NSW Department of Primary Industries, NSW WeedWise: Spiny burrgrass – spinifex (Cenchrus spinifex), with companion profile Spiny burrgrass – longispinus (Cenchrus longispinus). https://weeds.dpi.nsw.gov.au/Weed/SpinyBurrgrassSpinifex

42. NSW Department of Primary Industries, NSW WeedWise: Fireweed (Senecio madagascariensis). https://weeds.dpi.nsw.gov.au/Weed/Fireweed

43. NSW Department of Primary Industries, NSW WeedWise: Tropical soda apple (Solanum viarum), and Biosecurity (Tropical Soda Apple) Control Order. https://weeds.dpi.nsw.gov.au/Weed/TropicalSodaApple

44. NSW Department of Primary Industries, NSW WeedWise: Parthenium weed (Parthenium hysterophorus). https://weeds.dpi.nsw.gov.au/Weed/PartheniumWeed

45. NSW Department of Primary Industries and Regional Development, Procedure – Anthrax Management (2025). https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0008/1624193/PROCEDURE-Anthrax-2025-DPIRD.pdf

Operational wind limits (Section 5)

46. SafeWork NSW, *High winds in construction* (Hazards A–Z guidance), accessed 22 Oct 2026 — wind speed limits for cranes and plant must be confirmed before work starts; plant and lifting operations stop when manufacturer limits are reached.

47. Australian crane industry guidance (AOR Cranes, *How Wind Speed Impacts Crane Lifting Capacity & Safety*, 22 May 2025), citing AS 2550.5-2016 and Manitowoc Cranes wind conditions guidelines: crane stand-down band 9–14 m/s (32–50 km/h) by crane type; load capacity derates as wind rises (Safe Work Australia, *Guide to Mobile Cranes*, cited therein).

Transgrid and EnergyConnect sources (Sections 6, 7):

Transgrid, Fencing Guidelines: Earthing and Isolation of Fences in Easements (2021). https://www.transgrid.com.au/media/keung5in/fencing-guidelines.pdf, accessed 28 Oct 2026.

Transgrid, Easement Guidelines: Living and working with electricity transmission lines (2024). https://www.transgrid.com.au/media/3tkdd5lr/easement-guidelines.pdf, accessed 28 Oct 2026.

Transgrid, Flying uncrewed aerial vehicles near Transgrid infrastructure (2024). https://www.transgrid.com.au/media/jm0d33o4/uncrewed_aerial_vehicle_fact_sheet_oct_25_r1.pdf, accessed 28 Oct 2026.

Tremain Ivey Advisory for Transgrid, EnergyConnect (NSW – Eastern Section) Environmental Impact Statement: Technical Paper 4 – Agricultural Land Impact Assessment (2022). https://www.transgrid.com.au/projects-innovation/energyconnect, accessed 28 Oct 2026.

Pending: NSW eSPADE hazard-mapping overlay (espade.environment.nsw.gov.au) for the Section 7.1 hazard-overlay finding, awaiting Damien's supply.

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

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

SECTION 12

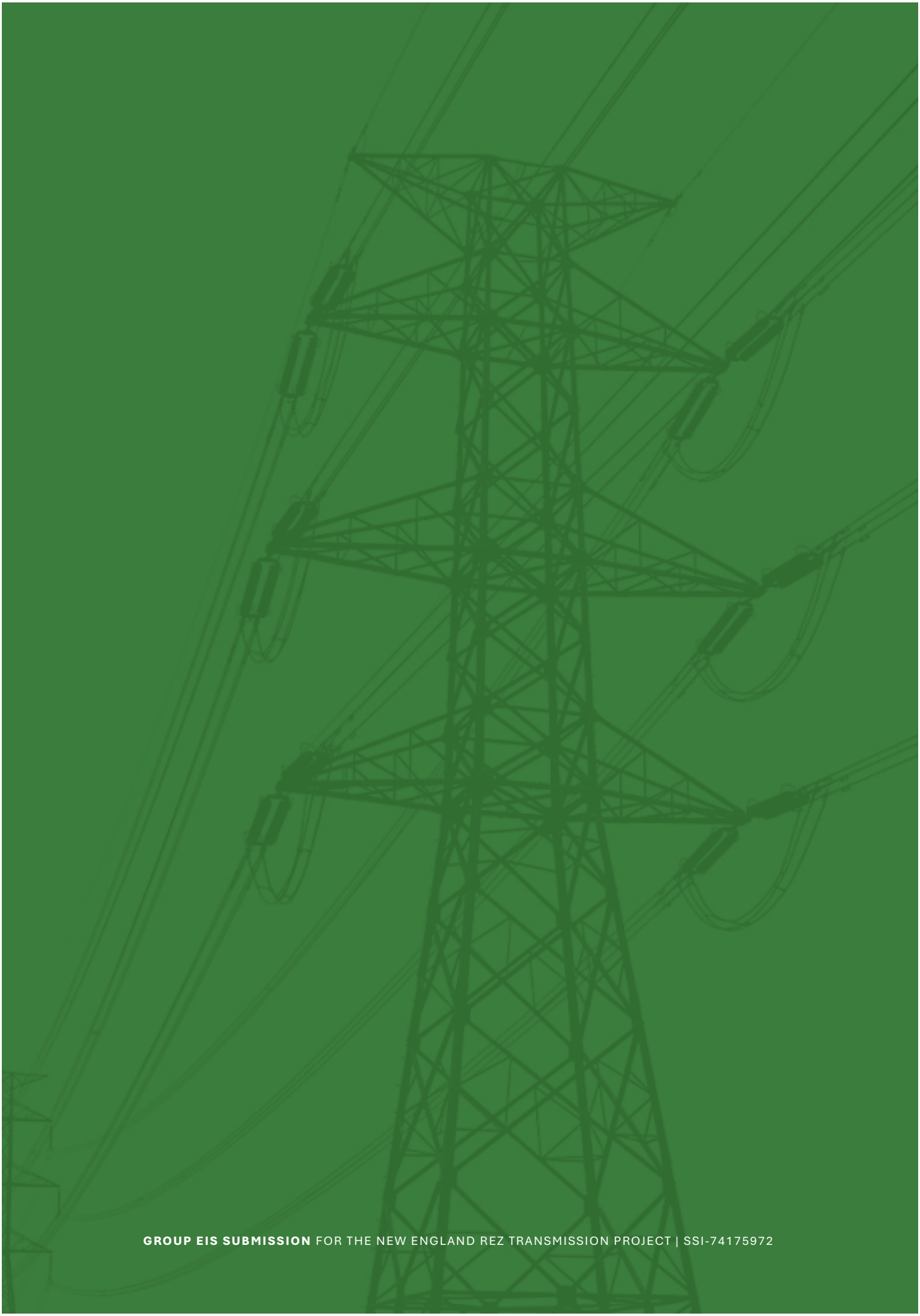
Biosecurity

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 12

Biosecurity

Key issues we have found ...



Farm biosecurity baselines are missing

Farm biosecurity baselines are missing Without property surveys establishing weeds, pests and diseases, landholders cannot reliably identify new contamination or hold contractors accountable for spread.



Construction can spread farm contamination

Machinery, imported gravel, soil, water and workers can transfer weeds and pathogens between farms and projects unless effective controls apply.



Disease risks remain incompletely assessed

Workforce movements and disturbed agricultural dust can expose livestock, workers and neighbouring families to disease risks the assessment leaves unresolved.



Control promises need enforceable standards

Risk ratings rely on future plans, without demonstrated cleaning standards, independent checks, enforceable entry conditions or clear responsibility for breaches.



Weed control becomes permanently harder

Transmission lines restrict aerial spraying and complicate ground control, creating lasting management burdens where equivalent alternatives have not been demonstrated.



Landholders need funded lasting protection

EnergyCo must fund ongoing monitoring, weed control and compensation, with clear responsibility for biosecurity breaches throughout construction, operation and decommissioning.

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

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SECTION **12**

Biosecurity

The EIS does not contain a completed, integrated and property-specific assessment of biosecurity, weeds, pests and disease impacts. Its conclusions rely on incomplete surveys, limited consultation, regional evidence, future management plans and assumed control performance. As a result, it does not show that these impacts have been identified, avoided, minimised or reduced to an acceptable level before approval.

This is not a claim that every impact is certain or can't be managed. It is that the approval authority is being asked to approve a very large, linear project before the survey, access, design, biosecurity and cumulative-impact questions have been answered at property scale. The EIS relies again on future detailed design, future management plans, ongoing surveys and consultation with a future network operator. That makes it impossible for landholders or the consent authority to test the real residual impact now.

By relying on high-level, post-approval and generalised management frameworks, the EIS does not meet the enforceable standard expected by the NSW Department of Primary Industries and Regional Development (DPIRD), or show that the project can meet the general biosecurity duty in section 22 of the Biosecurity Act 2015. The grounds are set out under 'Basis of objection' below.

The economic stakes are real, and the figures available understate them. Once a weed gets into clean country it rarely goes away, and it costs every year. NSW DPI says African lovegrass is a major weed of grazing country across NSW, that it takes over disturbed ground, and that graders, slashers, vehicles and fodder spread it [2]. Farmers managing it report that sheep numbers on one Bredbo property fell by about a third despite winter feeding, and that a Tenterfield producer estimates carrying capacity would be about 30% lower without his management [3]. Those case studies are old and come from other districts, so losses on high-input country on the Northern Tablelands today would be higher, with higher stock, wool, feed and control costs. TR6 values grazing at a regional average that doesn't reflect high-input pastures here, where stocking rates average 4.21 stock units per hectare against 1.53 for NSW (TR6 4.5.3 and 4.5.4). This project means roads, tracks, camps and easements across about 10,928 hectares of mainly grazing country, and neither the EIS nor TR6 puts any cost on a biosecurity breach. Any figures quoted in this submission show what the EIS counted or what older studies found. They are not a measure of what landholders would lose, and they don't limit any claim.

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What this submission asks for

The EIS should not be approved on its present biosecurity assessment. EnergyCo should be sent back to do the work listed under 'Work and information requested' at the end of this submission. In short: survey the whole route for weeds, pests and disease; finish the biosecurity risk assessment the State agriculture department asked for and put it on exhibition; redo the anthrax and human health assessments with site evidence; assess the permanent loss of weed and pest control under the lines; show who pays and who is responsible; and publish the biosecurity and contractor plans before approval so landholders can test them.

Basis of objection

The objection rests on seven grounds.

1. **The SEARs requirement isn't met.** The SEARs ask the EIS to 'identify potential biosecurity risks and appropriate strategies to prevent, eliminate or minimise those risks' (EIS Appendix A). That needs a risk analysis informed by local landholder practice and regional weed priorities, with enforceable strategies, not a pointer to Section 13 and two technical reports. Community concern was large: biosecurity concerns were raised over 300 times, 265 times in the most recent round of engagement, and Uralla Shire Council raised weeds and pathogens spread by clearing, soil movement and construction traffic (EIS Appendix E, Tables E.1 to E.4 and E.6).
2. **The baseline is deficient.** Only 54 per cent of the project area has been surveyed, and for biodiversity, not biosecurity (EIS page 225). There is no route-wide, property-level picture of weeds, livestock and plant disease, pest animals, imported material or contractor movements, so nobody can detect, measure or be held accountable for a breach.
3. **The weed risk assessment is generic.** It is a regional species checklist, not mapping of where priority weeds already occur on each property and how they would spread.
4. **The consequences of a breach aren't assessed.** The State significant infrastructure guidelines ask an EIS to identify key risks, doubts about whether mitigation will work, and cumulative impacts (Appendix B, sections 3.3 and 3.7) [12]. The EIS treats biosecurity as a risk that paperwork removes. It has no analysis of how fast a priority weed such as Chilean needle grass would spread on a clean property, no costing of lost pasture, control, stock health or 'clean and green' market access, and no doubt identified about whether wash-down will work, although the risk ratings depend on it. TR6 itself says a breach is likely to push up costs and cut income for more than three years (TR6 5.12.1). The EIS doesn't say so.
5. **The documents contradict each other.** The EIS baseline has wild dogs at medium to high abundance and deer in medium to high numbers (EIS 13.2.5), yet pest animal impacts are rated 'very low' (EIS 13.3.5.2; TR6 5.12.3). Other conflicts are set out under Matters affecting agriculture.
6. **Risk ratings depend on plans that don't exist.** The EIS lowers its residual ratings because biosecurity management plans and Construction Environmental Management Plans (CEMPs) will be written after approval, so landholders are asked to accept them without seeing the wash-down standards, audit rules or enforcement. Words like 'where practicable', 'should' and 'minimise' give no protection without binding conditions.
7. **Whole classes of risk are deferred or ignored.** The EIS assesses anthrax for workers near Rouchel (EIS 13.3.5.3) but not Q fever, tetanus or other soil-borne and animal-borne risks. It says the workforce may come from overseas (EIS 3.3.3.3) without dealing with foot and mouth disease, and it doesn't deal with the limits the towers place on weed and pest control.

Standards the plan should be held to

The general biosecurity duty in section 22 of the Biosecurity Act 2015 applies to everyone dealing with biosecurity matter, and TR6 accepts it (TR6 2.1.1). Since 1 August 2019 the Biosecurity Regulation 2017 has made it mandatory for visitors to comply with a property's biosecurity management plan, and failing to do so may be an offence under the Act, with on-the-spot fines and higher court penalties for individuals and corporations [13]. The offence doesn't apply where no plan is in place or being implemented, so landholders' own plans and signs need to be recognised and not overridden by the project. NSW Government guidance on vehicles and machinery is 'come clean, leave clean', with DPIRD wash-down procedures, and says people and carriers have a duty to manage the biosecurity risk so far as is reasonably practicable [14]. Any CEMP should require certified vehicle wash-downs and soil-hygiene records to that standard before a vehicle enters a property. NSW Farmers told the 2023 NSW Parliament inquiry into undergrounding transmission that biosecurity risk during construction and ongoing maintenance of power lines is a major concern to farmers, and that more frequent maintenance of overhead lines raises the risk of breaches (submission 163, section 4.2) [15]. Because farms hold different health statuses, such as weed-free or organic certification, blanket project-wide measures are not enough. Most of the project area is Class 4 to 7 land under the Land and Soil Capability Assessment Scheme (TR6 4.2.3; EIS 13.2.1), which is the grazing country the region's livestock industry depends on, so a breach has lasting regional effects.

What the State's own agriculture agency asked for

In August 2024, NSW DPIRD Agriculture told the Department of Planning that biosecurity had not been included in the draft SEARs and recommended a Biosecurity Management Plan covering pests, weeds and emergency animal diseases such as Foot and Mouth Disease and Japanese Encephalitis, a risk assessment of the likely plant, animal and community risks, biosecurity at the property level, and consideration of where construction materials come from [22]. The SEARs issued on 7 April 2026 [23], which the EIS responds to, include biosecurity as a single line: 'identify potential biosecurity risks and appropriate strategies to prevent, eliminate or minimise those risks'. That wording closely follows DPIRD's. Of the four 2024 letters on the planning portal that were reviewed (DPIRD, Walcha, Upper Hunter and Liverpool Plains councils), DPIRD's was the only one to raise biosecurity [23], and it is hard to avoid the conclusion that biosecurity was likely to have been missed if DPIRD had not spoken up. In 2026 Uralla Shire Council (4 February) and Tamworth Regional Council (12 March) asked for biosecurity risks from clearing, soil movement and traffic, and biosecurity over the full operational life of the project, to be assessed [23]. Of the 14 council and agency letters reviewed, only these three raised biosecurity, and the amended SEARs added nothing on property-level plans, materials origin, emergency animal diseases or the operational life.

The EIS did take up much of DPIRD's request. Measure AG5 (EIS 13.7) repeats DPIRD's wording almost word for word, promising a plan that includes 'a risk assessment outlining the likely plant, animal, and community risks', plus property-specific plans. But that is a promise to do the assessment later, not an assessment in the EIS. The EIS has already rated the risks: weed spread as moderate, vertebrate pests as very low, and plant disease as needing no specific mitigation (EIS 13.3.5). Foot and mouth disease gets two sentences based on one landholder's concern (EIS 13.3.5.3; TR6 5.12.4), Japanese encephalitis is named only in AG5, and the only human health risk assessed is anthrax. The assessment needs to be done and put on exhibition before approval, so the public can test it. The EIS does include a land use conflict risk assessment that lists biosecurity among its high-risk activities before mitigation (EIS 13.5; TR6), but that is not the assessment DPIRD described.

Matters affecting biodiversity

Biodiversity and biosecurity are tied together, and the biodiversity assessment doesn't deal with the biosecurity side. Weeds, pests and pathogens move through native vegetation and across the boundary with farmland, so a biosecurity failure is also a biodiversity failure. The survey effort also matters here: biodiversity survey has covered about 54 per cent of the 10,928 hectare project area, with land access stopping the rest, and the EIS fills the gap by assuming threatened species are present (EIS page 225). The same precaution has not been applied to weeds, pests or disease.

Issue B1: clearing and new tracks create corridors for weeds and feral animals

The EIS accepts that indirect impacts of clearing include the introduction and spread of weeds. Clearing, machinery tracking and new access tracks create open, disturbed soil edges that act as direct transport corridors for invasive weeds and feral pests. The biodiversity assessment needs to map existing weed and pest populations at every clearing, track and easement, assess the spread risk from each, and set controls and monitoring that sit alongside the biosecurity plans, not after them.

Issue B2: soil disturbance can activate anthrax and wildlife can carry it

Tower foundations and trenching mean deep soil disturbance. Anthrax spores survive for a long time in soil. If excavation disturbs them, wildlife moving through the open corridor could carry the disease to adjoining farmland before any livestock show signs. The biodiversity assessment needs to consider wildlife as a pathway for anthrax, in the Rouchel area and wherever excavation reaches deep soil, and tie that into the anthrax controls (see Anthrax).

Issue B3: habitat connectivity measures can bring wildlife and livestock into contact

The biodiversity report relies on a Connectivity Strategy to keep habitat linked for native fauna. If animals are pushed onto ground-level bypasses or into concentrated refuge zones by clearing, their behaviour changes. Higher density and shifted movement create new contact zones between wildlife and domestic livestock, which raises the risk of wildlife-borne diseases and parasites reaching cattle and sheep, Q fever for example. The Connectivity Strategy needs a biosecurity assessment of where crossings, bypasses and refuges meet stock paddocks, with fencing and monitoring where they do.

Issue B4: the biodiversity hygiene commitment is good but isn't carried across

The biodiversity chapter has the strongest biosecurity commitment in the EIS. Measure B15 (Table 7.10, EIS page 289) requires a Biosecurity Management Plan, as a sub-plan of the Biodiversity Management Plan, prepared under the Saving Our Species hygiene guidelines for Phytophthora cinnamomi, myrtle rust, chytrid fungus and invasive plants (DPIE 2020). As a minimum it requires wash-down facilities and procedures for vehicles, machinery and footwear at designated entry and exit points, access management zones where pathogens are detected, supplier certification that imported soils and materials are clean, and pre-clearing weed mapping, herbicide treatment and recording. None of this appears in the agriculture commitments (Table 13.5), which describe a different 'general Biosecurity Management Plan' (AG5). So the EIS has two plans with similar names, written under different chapters, and no statement of which controls apply on farmland. EnergyCo needs to say which plan governs, adopt B15 as the minimum on all land, and add what B15 leaves out: who inspects wash-down, how records are kept, chemical treatment between biosecurity zones where soil-borne pathogens are a risk, and how certification works in practice.

Issue B5: the biodiversity survey approach hasn't been applied to biosecurity

Biodiversity, agriculture and the anthrax and equine reports each deal with a slice of biosecurity, and none takes responsibility for the whole. The EIS accepts the principle for biodiversity: where land access has prevented field survey it uses assumed presence of threatened species until survey can be completed (EIS 26.5.1). EnergyCo needs to apply the same assumption to weeds, pests and disease, put out one integrated biosecurity assessment that covers native vegetation as well as farmland, and base it on one route-wide weed and pest baseline.

Matters affecting agriculture

The agricultural biosecurity assessment is spread across EIS Section 13 (Agriculture and soils) and the technical reports behind it: Technical Report 6 (Agriculture, Tremain Ivey Advisory, 7 September 2026, called TR6), and Technical Reports 20 to 22 (anthrax and equine). Both say weeds spread by vehicles, machinery, people, soil and water are the biggest biosecurity risk (TR6 Executive summary; EIS 13.2.5). Taken together, they don't show that EnergyCo can meet the general biosecurity duty (TR6 2.1.1). Each issue below says what is wrong and what the EIS needs to change, add or research.

Issue A1: the evidence is too thin, and the EIS doesn't say so

Only about 54 per cent of the 10,928 hectare project area has been surveyed, for biodiversity and not for weeds, pests or livestock disease (EIS page 225). Land access stopped survey of the rest, about 5,000 hectares, and neither Section 13 nor TR6 says so. The EIS uses assumed presence where access prevented survey, but only for biodiversity (EIS 26.5.1). EnergyCo needs to survey the whole route, hubs, tracks, camps and work sites for weeds and pests, publish the maps, and until then assume weeds and pests are present on unsurveyed land and apply the full controls there.

The rest of the evidence is also weak. TR6 interviewed two landholders, both beef producers at Muscle Creek (TR6 Table 3-1 and 3.3.1). Nobody was interviewed in the Northern Tablelands, where serrated tussock and Chilean needle grass occur, or with sheep, horticulture or horses, yet the EIS twice concludes that landholders raised no significant risk (EIS 13.3.5.2 and 13.3.5.4). TR6 lists no LLS meeting, nothing with Uralla Council and no industry groups (TR6 3.3.2), and Appendix E shows LLS was sent only a written update (Table E.7). The weed and pest data are inspection records, which show where officers looked, not where weeds are absent. Footrot figures stop at December 2023, OJD figures are from 2010 to 2011, there are no sheep lice figures, and weed records were checked in June 2025 for a September 2026 report (TR6 3.4.2, 4.6.1 and 4.6.3). EnergyCo needs to update this with current DPIRD and LLS information, interview landholders across the whole route and every farm type, and consult LLS, Uralla Shire Council and industry groups. TR6 also admits biosecurity effects reach beyond the project area but can't be mapped (TR6 3.2). The area that could be affected needs to be defined and its owners told.

Issue A2: the EIS and the technical reports don't agree

The EIS says 13 conflicts were high risk before controls (EIS 13.5), but TR6 Table 7-4 has 15 ratings above its own cut-off of 10. Both say only one conflict stays high after controls (EIS 13.5; TR6 7.3), but Table 7-4 still shows ratings of 11 for on-ground operations, loss of irrigation water, long-term loss of land and aerial agriculture. The EIS says no plant disease measures are needed (EIS 13.3.5.4) and then says they are outlined in Section 13.7, which has none. TR6 says five stock reserves intersect the footprint and the EIS says six (TR6 5.10; EIS 13.3.6). The nearest vineyards are 10 km away in the EIS and 11 km in TR6, and the risk guide is dated 2002 in one and 2011 in the other. EnergyCo needs to go through both line by line, fix every difference and re-issue Section 13 and TR6 together.

Issue A3: the weed work has gaps

African lovegrass isn't mentioned in the EIS or TR6, even though DPI says road works, graders and vehicles spread it [2]. EnergyCo needs to say whether it is along the route, assess the risk and put it in the controls. The weed lists also don't match. TR6 Table 4-15 leaves out lantana and the weeds named in TR6 5.12.2, the EIS lists only about a dozen weeds against TR6's twenty or so, and parthenium weed is called both a common weed and something that could be brought in. The EIS also leaves out TR6's point that Noogoora burr, spiny burrgrass and Bathurst burr contaminate wool and cut prices, so a reader never sees why they matter in dollars. One weed list is needed, in both documents, showing where each weed occurs on each part of the route.

Serrated tussock and Chilean needle grass, both Weeds of National Significance, are in the north of the route but rare in the south (TR6 4.6.1). This is one long job moving machinery along the whole line, yet neither document promises anything about order of work, or checking and washing machinery where infested country meets clean country. TR6 says weed growth goes up when ground cover and soil are disturbed (TR6 5.2, 5.12.2 and 6.1.2), but there is no standard for seed, mulch, hay or topsoil used in rehabilitation and no weed monitoring afterwards, and the EIS describes clearing as improving grazing land. Herbicide use isn't assessed at all, including spray drift onto vines, horticulture and organic crops, or stock withholding times. EnergyCo needs to map infested and clean sections, set work sequencing and wash-down rules between them, set weed-free standards for rehabilitation materials with a monitoring period, and set spray drift and withholding rules.

Issue A4: the risk scores rely on controls that aren't promised

The EIS's own risk assessment rates the unmitigated agriculture risks in construction as High, a group that includes weed spread, livestock disease and anthrax areas, and in operation as Medium, including ongoing biosecurity risk from maintenance (Appendix A, Table A.8). The lower residual ratings depend on controls that aren't committed. TR6 Table 7-4 relies on washing down all vehicles before they enter agricultural areas, washing down between paddocks with known infestations, temporary fencing around facilities, following landholder protocols, and reporting any new or existing infestation of a priority or unidentified weed. None of these are in TR6 Table 9-1 or EIS Table 13.5, and cleaning only appears as a topic for a later plan (AG5). Wash-down at entry and exit points appears only in the biodiversity commitment B15, not in anything the agriculture assessment relies on (see Issue B4). Every control the risk table relies on needs to become a firm commitment, or the risk needs to be re-scored without it. Operation is called much lower risk than construction with no figures (TR6 6.3; EIS 13.4.5), yet up to 100 staff and vehicles will use permanent tracks along about 240 km of 500 kV line and 65 km of other lines for decades, and decommissioning isn't assessed at all. An operational and decommissioning risk assessment is needed.

Issue A5: the commitments are too thin, and nobody is responsible

AG5, AG6, AG11 and AG12 leave the content to a general biosecurity plan and farm-by-farm plans written after approval, in the project CEMP and Operational Environmental Management Plan (TR6 chapter 9). There are no standards, no audits and nobody named as responsible. The EIS says biosecurity controls were used for the project's own fieldwork (EIS 2.5.3.4) but doesn't say what they were, and they should be published as a starting point. The EIS budgets about 17 ML of water for biosecurity wash stations but commits to none in Table 13.5 (wash-down appears only in biodiversity measure B15), with nothing on number, location or wash water. AG2 refers to places of high biosecurity risk but identifies none. AG5 only matches controls to a property biosecurity plan where one exists, so a farm without a plan gets no minimum standard. AG6 only covers new infestations of priority weeds caused by construction. Nothing covers induction, training, contract requirements or independent audits for a workforce of about 1,400 at peak (TR6 1.2.2). AG12 says

easement weeds will be managed under the Biosecurity Act but doesn't say who does it, how often, for how long or who pays, which leaves the work and cost with landholders, and TR6 says normal boom spraying can't be used around towers and other structures. EnergyCo needs to put out a draft biosecurity plan and the biosecurity risk assessment with the EIS, or commit to the minimum standards set out in this submission as conditions of approval, name who is responsible, and set money aside for the life of the project.

Issue A6: ways weeds and pests can travel that weren't assessed

Each of these is a pathway for seed, soil or disease that neither document assesses as biosecurity. EnergyCo needs to assess each one and set controls for it.

- **Gravel, fill and concrete materials.** The project includes earthworks material sites with crushing and screening plants and batching plants (TR6 1.2.1 and 1.2.2). The EIS says weed-free green waste will be mulched and reused on site and weed-contaminated waste taken to a licensed facility (EIS Section 23 waste management), but without a baseline survey nobody can tell which is which.
- **Water.** Construction will use about 2,400 ML, 73% of it for dust suppression (TR6 5.8). TR6 says water can carry biosecurity matter (TR6 5.12.1), but AG7 only covers whether enough is left for farmers. The EIS leaves TR6's water section out completely. Rules are needed for where water is sourced, moving it between catchments and treating it.
- **Workforce camps.** The five camps, housing up to about 1,400 workers, are only looked at for conflict with neighbouring farms (TR6 1.2.2 and 5.11). Rubbish, food scraps, landscaping, fill, boots and clothing, and workers from outside the region aren't assessed, although TR22 treats biosecurity as a pathway for Main Camp Brooker.
- **Stock routes and roads.** Nine travelling stock reserves are next to or crossed by the route and public roads are being upgraded, but seed carried on vehicles along them isn't considered (TR6 Table 4-8, 5.10 and 6.11; EIS 13.2.4 and 13.3.6).
- **Aircraft.** Helicopters, helipads and drones are used for tower assembly, stringing and inspections (TR6 5.6.1; EIS 13.4.4.2), but nobody has assessed them as a way of moving seed or soil between sites.

Issue A7: pest animals, livestock disease, plant disease and bees

Both documents call these risks low, but that rests on old or missing data and two interviews. On pest animals, both look only at food waste attracting foxes and pigs. Neither considers easements 70 to 140 metres wide and new access tracks acting as routes for pigs, wild dogs, deer, foxes and rabbits (TR6 5.12.3 and 1.2.2; EIS 13.3.5.2), and the 'very low' rating contradicts the baseline described above. Footrot, sheep lice and OJD are called low risk on figures that stop at December 2023, no lice figures and OJD data from 2010 to 2011, and no sheep controls are set, although TR6 says footrot can spread in wet soil and moderate temperatures, which occur on the tablelands (TR6 4.6.3 and 5.12.4). TR6 spells out what these diseases cost in wool, fertility, growth, treatment and lost sheep, and the EIS leaves that out. Controls for sheep country, a fresh risk assessment on current figures, and the cost going into the EIS are all needed.

On plant disease, nobody who grows horticulture, potatoes or grapes was interviewed, even though both documents name vineyards in the Hunter and near Armidale, potatoes at Guyra and a large tomato business near Armidale. The Phylloxera Exclusion Zone and Potato Biosecurity Zone are described but never turned into project rules (TR6 5.12.5; EIS 13.3.5.4). TR6 notes risks to bees (small hive beetle, American foulbrood, European foulbrood) with no measure for them, and calls the risk to organic producers very small without identifying a single certified property (TR6 5.12.5 and 5.12.6; EIS 13.3.5.5). Those growers, beekeepers and organic properties need to be found, consulted and given specific controls.

Issue A8: foot and mouth disease and the overseas workforce

Foot and mouth disease and lumpy skin disease get one paragraph in TR6, which notes that people coming from overseas could bring them in (TR6 5.12.4). AG5 names foot and mouth disease and promises 'appropriate measures' in the property-specific plans written later. The EIS says a landholder's concern about overseas disease 'highlights the importance of measures to prevent the introduction of exotic animal diseases by personnel and equipment' (EIS 13.3.5.3), and says the workforce of up to 1,400 may be sourced locally, regionally, interstate or from overseas (EIS 3.3.3.3), but it doesn't deal with the specific route this creates. The virus can survive for weeks on clothing, footwear, luggage and personal gear, and for months in untreated meat and unpasteurised dairy. If workers from FMD-affected countries, or travelling through them, enter pastoral work zones without decontamination, the consequences are severe: an immediate shutdown of livestock exports, mass culling and long-term quarantine of properties. That would more than wipe out the regional economic benefits claimed for the project. EnergyCo needs to assess this pathway and commit to the overseas worker protocol set out under the general biosecurity plan.

Issue A9: Q fever and tetanus put the workforce and neighbours at risk

The biosecurity framework in the EIS focuses on livestock-to-livestock disease, such as anthrax, and doesn't adequately deal with human health risks from soil disturbance. Q fever is caused by the bacterium Coxiella burnetii, which is shed in large numbers by cattle, sheep and goats in birth products, faeces, urine and milk, and survives in contaminated dust and soil for many months (SafeWork NSW) [16]. Excavation, trenching and heavy vehicle movement aerosolise dried, contaminated dust that wind can carry over long distances, and inhaling even a very small dose can cause serious illness, including severe fever, long-term fatigue and heart complications. Tetanus spores are present in agricultural soils and manure, and clearing scrub, handling old wire and operating machinery create puncture wounds and lacerations. The EIS assesses anthrax exposure for construction workers near Rouchel (EIS 13.3.5.3) but doesn't mention Q fever, tetanus or similar risks at all, for workers, residents or farm workers. That leaves families and employees unprotected in the highest-risk early phases, and leaves contractors working inside farm safety systems without any prior assessment. The assessment needs to be done and exhibited now, with the controls set out under the general biosecurity plan.

Issue A10: the towers permanently limit weed and pest control

TR6 accepts that lines and towers reduce the efficiency of aerial agriculture, that some areas 'may not be able to be treated safely at all', that treating them from the ground would be 'less efficient, less timely and more costly', and that drones can't be flown within the easement or within about 30 to 45 metres of lines (TR6 6.7). TR6 Table 7-4 still rates aerial agriculture at 11 after controls, and DPIRD Agriculture asked for restrictions on aerial activities to be considered (EIS Appendix E, Table E.7). The EIS treats the same issue as manageable, saying techniques for working around lines are 'readily available' (EIS 17.2.4). The Aviation Impact Assessment (TR11) deals with whether aircraft can fly safely. It notes that aerial application is usually flown below 100 feet and that the Aerial Application Association of Australia opposes tall structures without proper consultation (TR11 sections 4.4 and 4.4.1), and it proposes consultation, compensation or relocation for affected airstrips (section 6.2; AV1). None of that is about whether weed and pest control still works. Aerial spraying and drones are used for weed control, and in rough or wet country they may be the only practical option. The result is a permanent weed and pest reservoir along the corridor that re-infests neighbouring paddocks, with the cost falling on landholders for life. EnergyCo needs to assess the loss of aerial control property by property, show a workable alternative, and commit to funded, permanent control of weeds and pests in and beside the easement where aerial methods are lost.

Issue A11: horses fall between the reports

About 1,450 hectares of the Equine Critical Industry Cluster is in the project area, 572 hectares of it in the agricultural disturbance area (TR6 5.3.2). TR6 leaves horse disease to Technical Reports 21 and 22 (TR6 5.6.2), but TR21 deals with electric and magnetic fields, noise, vibration, dust, light and fencing, and its mitigation table (Table 8.1) has no biosecurity measure. TR22 lists biosecurity as a stakeholder concern, then deals only with anthrax (TR22 2.4.2). So nothing assesses how project vehicles, workers, machinery or camps could carry horse disease onto studs, which TR21 says have strict biosecurity requirements. Only EQ1 mentions biosecurity, as one topic in a plan for two properties, and EQ2 doesn't mention it. EnergyCo needs to assess horse disease risk in Section 13 and set specific controls for every equine receptor.

Issue A12: no biosecurity cost, and cumulative effects are waved away

Both documents put a dollar figure on production lost from the footprint, $4,254,000 over five years for 2,233 hectares at $381 a hectare and about $166,878 a year for operation on 438 hectares (TR6 5.1.3 and 6.1.3; EIS 13.3.1 and 13.4.1), but nothing for any biosecurity problem. These are EnergyCo's own figures, quoted only to show what the EIS counted. They are not accepted as a measure of what landholders would lose. Costing only the footprint can't capture spread beyond it. The EIS itself says stock may have to be excluded from whole paddocks and that grazing between works is subject to biosecurity requirements (EIS 13.3.1), which isn't costed. The loss is valued at a regional average of $364 a hectare, but TR6 says stocking rates here average 4.21 stock units per hectare against 1.53 for NSW (TR6 4.5.3), so high-input pastures have more to lose. EnergyCo needs to provide costed examples, such as a priority weed brought onto a clean property, a footrot outbreak and an anthrax outbreak, covering monitoring, control, lost production and compensation, and extend the costing beyond the footprint.

Both documents call cumulative biosecurity impact minor or negligible because of distance (TR6 8.2; EIS 13.6), but contractors, machinery and haulage move between projects whatever the distance. TR6 Table 8-1 shows overlapping construction, including Winterbourne Wind Farm and two wind farms the line runs through, and ten of the fourteen projects in that table have no economic analysis. Shared workforces, machinery and haulage need to be assessed, and biosecurity plans coordinated with those projects.

Anthrax

The EIS summarises Technical Report 20 (TR20), to which TR6 passes the whole anthrax question (EIS 13.3.5.3; TR6 5.12.4). The EIS says that without controls the risk to construction workers is low but above an acceptable level, and that for livestock a modest risk remains in the Rouchel area during and after construction, with an elevated risk of outbreaks still possible in realistic worst cases such as drought or heavy rain. That is more serious than the conclusions in TR6, which has no anthrax row in its risk table. The TR20 findings need to go into TR6 and the risk scores need to be redone. The worst cases aren't remote: TR6 records drought from late 2017 to 2019 followed by repeated La Niña flooding from 2020 to 2022 (TR6 4.1.2), and TR22 records that a swing from drought to intense flooding may have spread anthrax in the Hunter Valley in 2007 to 2008 (TR22 box 2.1).

Issue N1: the assessment doesn't match how anthrax behaves

Anthrax risk is strongly affected by soil, drainage, flooding, erosion, grazing patterns, carcass locations, dwellings and farm work areas. These are site-specific. TR20 calls itself a 'robust, high-quality assessment', yet it is a desktop study done in a limited timeframe where 'site access was not possible prior to completion

of the assessment' (TR20 page 8 and section 7.4, page 34). It is qualitative because there was not enough data for a quantitative assessment, it relies on expert opinion, and it says the lack of research is 'an important limitation' on the mitigation strategies for human health (section 7.4). On landholder risk it says 'we were unable to conduct a site visit to confirm this' and recommends EnergyCo re-assess once the project area, dwellings and high-activity farming locations are confirmed (pages 7 and 25). It also says mitigations cannot reduce livestock risk to a very low or negligible level in every scenario, even if implemented well (page 7). Tower foundations and trenching disturb deep soil where spores survive, and wildlife using the open corridor could carry the disease onto farmland (see Issue B2). EnergyCo needs to survey the physical conditions at every excavation site in and near the Rouchel area, including the ground conditions that were not observed, and redo the assessment on that evidence.

Issue N2: nobody is named to run, fund or answer for the controls

The key livestock controls are vaccination, exclusion fencing, water and soil management, grazing management and extension to landholders (EIS 13.3.5.3; AT1). Neither document says who runs or pays for the vaccination program, the fencing or the extra management, or what happens to a landholder whose stock are hit despite the controls. The EIS says a rapid outbreak response would be deployed, but not by whom, with what resources or at whose cost, and quarantine and trade restrictions on affected properties aren't discussed. The Emergency Animal Disease Response Agreement pays compensation for livestock and property destroyed, but it excludes consequential loss such as lost income, market access and contract breaches [17], so those losses fall on the producer. Anthrax is a priority emergency animal disease and prohibited matter under the Biosecurity Act 2015, and must be reported immediately [18]. EnergyCo needs to say who runs and pays for each control and the outbreak response, and indemnify landholders for livestock, production and market losses and costs from any anthrax outbreak linked to the works.

Issue N3: the plan is deferred and the area isn't defined

AT1 puts the anthrax plan inside the property-specific plans (AG5), which are written later. AT2 only promises notification to residences in the Rouchel area, and the area isn't defined. TR22 also says construction vehicles moving from a contaminated site could share routes with equine or agricultural vehicles and spread contaminants to properties outside Rouchel (TR22 2.4.2), so the controls can't stop there. The Holmes (Big and Small) stock reserve at Rouchel is next to the project (EIS Table 13.4; TR6 Table 4-8), but neither document considers the anthrax risk to travelling stock on it. EnergyCo needs to define the Rouchel area and the vehicle routes beyond it, put out a complete anthrax management plan for approval before works begin, and assess the stock reserve.

The anthrax controls the submission asks for are set out in the construction and operation plans below, including exclusion of excavation spoil from clean land, vehicle and equipment decontamination before leaving the Rouchel area, notification of every landholder in and beyond it, wildlife monitoring around excavations and, in worst-case weather, a stand-down of earthworks in mapped anthrax-risk areas.

General biosecurity management plan: Construction

The EIS should not be approved until a completed general biosecurity management plan has been exhibited. If the project is approved without one, the conditions of approval should require the following before any site entry. The plan must have measurable standards: inspection frequency, wash-down verification, audit requirements, detection thresholds, response times and clear restoration criteria. The EIS and TR6 don't set any of these.

1. Property-wide baseline weed, pest and disease mapping

A general regional species list is not acceptable. Before any site entry, every agricultural property that the footprint crosses or adjoins needs a baseline map made on the ground, with:

- **Extent and boundaries.** Every population of regional priority weeds, including Chilean needle grass, serrated tussock, St John's wort and blackberry, mapped with high-resolution GPS, showing exactly where an infestation ends and clean country begins.
- **Density.** Isolated plants, scattered light infestations and dense core infestations recorded separately, so any intensification during construction can be measured.
- **Spread pathways.** Drainage lines, runoff channels, prevailing wind, internal stock tracks and farm vehicle routes that carry weeds from infested ground into clean paddocks.
- **Clean zones.** Paddocks that are currently weed-free formally identified as exclusion zones, with maximum-level vehicle cleaning and locked gates before any contractor entry.
- **Pests and disease.** Pest animal abundance and harbour, and livestock and plant disease status, for each property.
- **Independent verification.** Mapping done by an independent agronomist or biosecurity specialist chosen with the landholder and paid for by the proponent.

These maps become the legal benchmark for the life of the project. They are updated by annual independent audits through construction and decommissioning, so that any new outbreak is found early and attributed to the works.

2. Vehicle and machinery hygiene

All vehicles and machinery must be cleaned before they enter the project area, between properties and between infested and clean country, to the NSW Government 'come clean, leave clean' standard. The plan must state where wash-down bays are, how runoff and pollution are captured, who inspects each vehicle, and how contractors will realistically achieve this in practice, including the wash stations the EIS already budgets about 17 ML of water for. Each vehicle needs a cleaning certificate and log. Work must run from clean to infested country, and soil-borne pathogens such as Phytophthora need chemically treated wash-down at major shifts between biosecurity zones. Wash-down that isn't logged is treated as not done.

3. Chain of command and accountability

The EIS has no enforceable operational hierarchy. Paper protocols are worthless without personal accountability, and contractors must not be able to plead ignorance of a plan. Before construction starts, a command structure should be legally established with these roles:

- **Corporate accountability.** The CEO of EnergyCo keeps ultimate legal and financial liability for biosecurity breaches across the project footprint. That liability cannot be contracted out or passed down to minor subcontractors.

- **Independent Biosecurity Compliance Officer (IBCO).** A qualified, independent specialist, funded by the proponent but reporting directly to the Department of Planning and Local Land Services (LLS), to oversee the corridor.
- **On-site biosecurity supervisors.** Dedicated, full-time supervisors employed by the principal contractor, personally responsible for checking decontamination logs, inspecting wash-down, making sure locked gates are used, and issuing a physical 'Clear to Enter' pass for every property boundary crossing.
- **Stop-work authority.** The IBCO and the individual landholder can immediately halt work on a property or construction front if a breach is seen, such as a vehicle bypassing a wash-down bay or an unlogged entry through a locked gate. Work stays suspended until the breach is investigated, fixed and signed off by the IBCO at the proponent's expense.
- **Consequences.** Individual operators who knowingly bypass a control or falsify a log are removed permanently from the project. The project contract sets a financial penalty for each breach by a subcontractor, high enough to deter and doubling for repeat offences and terminates any subcontractor with three recorded non-compliances. Any breach that results in a confirmed introduction of a priority weed or livestock pathogen is referred to DPI for prosecution under the Biosecurity Act 2015, and the proponent carries civil liability for decontamination and production loss.

4. Emergency animal disease response (EADRA)

The plan must explicitly align with the Emergency Animal Disease Response Agreement (EADRA) framework. If construction activity or contractor movement triggers an outbreak of foot and mouth disease, bluetongue or another emergency animal disease, standard corporate incident protocols are far too slow. The conditions should require:

- immediate activation of EADRA-compliant quarantine and lockdown across the whole corridor as soon as a case is suspected;
- full indemnity for affected producers for any costs, destruction of livestock or market losses not covered by government cost-sharing; and
- immediate release of project GPS tracking data, vehicle logs and worker manifests to state and federal authorities for contact tracing.

5. DPIRD alignment and wildlife monitoring

All containment, notification and response arrangements must follow current DPIRD biosecurity guidelines and reporting thresholds. Open trenches and construction zones attract and trap feral and native animals such as pigs, wild dogs, deer and macropods, which can carry soil-borne pathogens and weed seed across boundaries. The plan must include motion-activated cameras and thermal monitoring around open excavations, clearing zones and stockpiles, daily inspection of excavations, and fencing off or backfilling open trenches at the end of every shift.

6. Certified fill, gravel and backfill

All backfill, bedding sand, road base and gravel must come from a certified quarry that provides a weed-free and pathogen-clean guarantee. Moving excavated material from one property or location along the corridor to another, or using second-hand or recycled soil, rock or spoil on or beside agricultural land, must be prohibited, because it would carry contamination from one property to a clean one. The proponent must keep a digital register of every material source with delivery manifests and quarry certificates, open to landholders and independent auditors. The same weed-free standard applies to seed, mulch, hay and topsoil used in rehabilitation.

7. Water, camps, roads and aircraft

Water for construction, dust suppression and wash-down must come from sources approved as free of biosecurity matter, with rules for moving water between catchments. Workforce camps need rules for waste, food, landscaping materials, boots and clothing, and worker declarations. Heavy vehicle routes and travelling stock reserves need controls on seed carried along them. Helicopters, helipads and drones need landing site checks and cleaning between sites. Herbicide use needs spray drift controls, notice to landholders and stock withholding periods.

8. Human health: Q fever and tetanus

To meet the general biosecurity duty and protect the workforce and community, the plan must include:

- **Q fever.** Every contractor, worker and supervisor on agricultural land must show proof of Q fever immunity, by a vaccination recorded on the Australian Immunisation Register or a positive test, before any clearing, ground-breaking or civil works, allowing for the 15 days immunity takes to develop after vaccination. SafeWork NSW regards vaccination as a high order risk control and says contractors and visitors should show proof of immunity [16]. Anyone who is not immune and can't be vaccinated is kept off agricultural work or restricted to low-risk areas with a P2 respirator and protective clothing.
- **Dust controls.** Dust suppression, such as watering active excavation zones, and a stop to dust-generating work during high-wind events so contaminated dust does not drift onto neighbouring properties.
- **Tetanus.** Verified medical records showing a tetanus booster within the last 5 years for every person in the field (the Australian Immunisation Handbook recommends a booster for a tetanus-prone wound if the last dose was more than 5 years ago, and fencing and excavation work makes such wounds likely), and nobody to fence, excavate or install assets without current immunisation.
- **First aid.** On-site medical facilities able to clean, disinfect and dress puncture wounds and soil-contaminated cuts straight away.

9. Overseas worker foot and mouth disease protocol

The plan must contain a binding protocol for overseas workers, applying to all contractors and labour-hire firms:

- **Declarations** and register. A register of every worker who has travelled internationally in the 30 days before arriving on site. Workers who arrive from, or have transited through, FMD-affected or high-risk regions are excluded until decontamination is verified.
- **No overseas gear.** No international worker may bring or use personal footwear, work boots or field clothing that was used overseas. Contractors issue new, unused boots, protective clothing and high-visibility wear on arrival.
- **Food rules.** Camps prohibit importing unsealed, cured or unpasteurised meat and dairy, and food scraps must be secured from wildlife and stock.
- **Inductions in the right language.** Biosecurity, emergency animal disease and property-rule inductions delivered in the first languages of the overseas workforce.

10. Training, monitoring and reporting

All personnel must complete a pre-entry biosecurity briefing before they enter any property. Monitoring must set out how long it runs, how often, what level triggers action and who is told. Every new weed, pest or disease in or near disturbed areas must be reported and measured against the baseline, not only priority weeds. Results are reported regularly and publicly to landholders, councils and LLS, with quick corrective action.

11. Anthrax controls

In the Rouchel area and wherever mapping shows anthrax risk, the plan must require: exclusion of excavation spoil from clean land; vehicle and equipment decontamination before leaving the area, including on routes used by farm and equine vehicles; wildlife monitoring around open excavations; notification of every landholder in and beyond the Rouchel area before works start; a stand-down of earthworks in mapped risk areas during drought-breaking rain, flooding or other worst-case weather; and a funded vaccination, fencing and outbreak response plan with a named responsible party.

Individual biosecurity management plan: Construction

Every affected property needs its own biosecurity management plan, agreed with the landholder and signed before any entry. Properties differ. Some are weed-free, organic, seedstock or horse studs, and blanket project-wide measures can't protect them. The individual plan sits under the general plan. Where the two differ, the stricter rule applies. The landholder pays nothing for preparing it, and is paid for their time. A landholder who already has a biosecurity management plan and signs has legal backing under the Biosecurity Regulation, and the project plan must not override or weaken it. Victoria's Land Access Code for transmission companies already requires biosecurity policies to be given to landholders before access, immediate notice of biosecurity incidents, and access agreements covering entry points and biosecurity measures [19]. Each plan must cover:

1. Property map and zoning

The baseline map for the property (clean zones, infested areas, drainage lines and stock tracks), plus the enterprises that need extra protection, such as certified organic or weed-free paddocks, horticulture and vineyards (including Phylloxera and Potato Biosecurity Zones), apiaries, studs, and sheep flocks with a known disease status.

2. Entry and access

Agreed entry points and routes, locked gates, no-go areas and a minimum period of notice before any entry. Nobody enters without a 'Clear to Enter' pass issued after a checked wash-down. A named contact on the contractor side who answers to the landholder. Work on the property runs from clean to infested areas.

3. Wash-down and vehicle rules on the property

The agreed location of the wash-down bay, how runoff is captured, and the rule that vehicles are cleaned again when they move between paddocks with different weed status. Vehicle, machinery and worker logs are kept for the landholder to inspect.

4. Livestock and paddocks

Stock movements, exclusion periods and temporary fencing agreed in advance, including when stock must be kept out of working areas or whole paddocks, how long, and how the landholder is paid for lost grazing and extra feed. Water points and troughs protected from dust, spoil and runoff.

5. Weeds, spraying and pests

Who controls weeds in the construction area and easement, when, and at whose cost. Spray drift rules for the property's sensitive crops and certified land, advance notice of spraying, and stock withholding periods. Controls for pest animals on the property, including backfilling or fencing trenches each day.

6. Disease risks specific to the property

The diseases that matter on this farm (for example footrot, OJD, lice, plant disease zone rules, anthrax history or horse health requirements), the controls that apply, and when the landholder's own biosecurity rules (such as quarantine or vaccination status) override the general plan. Horse studs and training facilities need protocols agreed with the owner for breeding, foaling and stock movement periods.

7. Monitoring and records

Pre-work inspection with the landholder, inspections at agreed intervals during works, photo and GPS records, and a final inspection against the baseline. The landholder holds a copy of every record and has stop-work authority if a breach is seen.

8. Make-good and compensation

Clear restoration criteria and deadlines, a way to value any loss that is agreed in advance, an independent expert if the parties disagree, and a commitment that EnergyCo pays for weed, pest and disease losses and control costs caused by the works, including those that appear after construction ends.

9. Sign-off and review

The plan is signed by the landholder before entry, copied to LLS, reviewed after any incident and at least once a year, and the landholder can ask for a review whenever circumstances change.

Biosecurity management plans: Operation

The EIS dismisses operational biosecurity risk as low, as if the hazards stop when heavy civil construction ends (TR6 6.3; EIS 13.4.5). That ignores the long-term pathways created by maintenance, vegetation management, emergency fault repairs and utility movement between properties. About 100 staff and maintenance vehicles will use permanent tracks and easements on about 240 km of 500 kV line and 65 km of other lines for decades (TR6 1.2.2). The Operational Environmental Management Plan (OEMP) is where this will be dealt with (TR6 chapter 9), and it too is written after approval.

The cross-contamination corridor

Maintenance crews, drone operators and substation technicians move from property to property within a single shift. If a vehicle or operator enters a paddock with an active infestation, a soil-borne disease or a livestock disease and then goes straight to a clean property, the corridor becomes a permanent pathway. Vegetation management on the easement (70 to 140 metres wide, TR6 1.2.2) uses heavy mulching and clearing machinery that moves between biosecurity zones, without the decontamination required in construction. Aerial inspections and conductor washing add to the movement.

General plan: operation

All construction-phase protocols must continue into operation and decommissioning, with the following added.

- **Operational baseline and benchmark.** The construction-phase baseline maps are the benchmark. They are re-surveyed independently every year, and any new infestation in or near the easement is treated as caused by the project unless shown otherwise.
- **Hygiene.** The same wash-down, logging and clean-to-infested sequencing as construction, applied to every maintenance and emergency crew, with emergency repairs not exempt.
- **Responsible party and funding.** EnergyCo or the Network Operator is named in the conditions of approval as responsible for weeds and pests in the easement and on access tracks for the life of the project, with a funded long-term program (and a bond or trust fund) that covers spraying around towers where boom spraying isn't possible, and monitoring.
- **Replacement for lost aerial control.** Where lines and towers prevent aerial spraying or baiting (Issue A10), the operator funds equivalent ground or drone control of weeds and pests on affected properties, at no cost to landholders.
- **Independent audit.** The IBCO role continues in operation, with annual public reporting to landholders, councils and LLS.
- **Contract flow-down.** Every maintenance and vegetation contractor must be bound to the plan, with the same removal, penalty and termination rules.
- **Decommissioning.** A biosecurity plan for decommissioning, with the same standards as construction, is prepared and exhibited before any approval for that stage.

Individual plan: operation

Each property's plan continues into operation and is updated before the first maintenance visit. It must set out:

- agreed notice periods and entry points for routine and emergency maintenance, with a named contact;
- wash-down before entry, visiting clean properties before infested ones, and a log kept for the landholder;
- who controls weeds around towers, tracks and the easement on that property, how often, and who pays;
- spray drift, notice and stock withholding rules for the property's sensitive crops and enterprises;
- how drones and helicopters are used over the property, with landing sites cleaned and agreed;
- vegetation clearing and mulching machinery cleaned before it enters the property; and
- restoration and compensation for any loss caused by maintenance work, with an independent expert to settle disputes.

Construction Environmental Management Plans and contractor responsibility

An EIS isn't required to contain a finished CEMP. The problem is that the EIS has lowered its risk ratings because of CEMPs that don't exist yet. The biosecurity detail (AG5, AG6, AG11 and AG12) is sent to later plans, which a network operator not yet appointed will write (EIS Table 13.5 and 25.2.2; TR6 chapter 9). Having relied on those plans to score the risk, the EIS needs to fix now what they must contain, and make sure someone is legally on the hook for delivering it. The Department's template conditions for linear infrastructure already require a CEMP approved before construction, an independent Environmental Representative and public audits (conditions C8 to C16 and A19 to A35) [20], and EnergyCo has said contractors' CEMPs for the South West Renewable Energy Zone must cover vehicle wash-down and property-specific biosecurity controls [21]. Biosecurity needs specific content on top of that minimum.

The conditions of approval should therefore require that:

1. **The biosecurity content is fixed in advance.** The CEMP and OEMP must include a biosecurity sub-plan that meets the standards in this submission (the general and individual plans above), and cannot be weaker. Wording such as 'where practicable', 'should' and 'minimise' is replaced by 'must' with measurable standards.
2. **An outline is exhibited now.** The EIS or the Submissions Report should exhibit at least a draft biosecurity sub-plan, so that landholders, DPIRD and LLS can test it before approval.
3. **The plans are approved before any work.** The EIS says main construction won't start until the issue-specific plans are approved by the Planning Secretary (EIS 25.2.2). But enabling works, which include workforce camps, site access points, access tracks, road widening and vegetation removal, can start before the CEMP is approved, under a separate Enabling Works Management Plan (EIS 25.2.1 and 3.3.4). Those are the works that first move machinery and soil onto land. No enabling or main work should start until the biosecurity sub-plan has been approved by the Secretary after consultation with DPIRD, LLS and affected landholders, the baseline is done and every property plan has been signed.
4. **The principal contractor is bound.** The network operator and principal contractor are contractually required to deliver the CEMP, to flow its biosecurity requirements down into every subcontract and labour-hire agreement, and to employ the on-site biosecurity supervisors. Subcontractors must be inducted and sign on to the plan, so none can plead ignorance.
5. **EnergyCo stays liable.** The proponent remains legally and financially responsible for the contractor's breaches, and cannot contract that out.
6. **Hold points stop work.** Wash-down certificates, 'Clear to Enter' passes and baseline sign-off are hold points: work cannot proceed without them, and the IBCO and landholders can stop work.
7. **The plans are audited and public.** Independent audits, incident reporting and corrective actions are published to landholders, councils and LLS, and the CEMP is updated after any incident. The EIS says the CEMP will be kept as an internal management document (EIS 25.2.2), so the biosecurity sub-plan must be made public.
8. **Operation is covered the same way.** The OEMP carries the same biosecurity requirements, binds maintenance contractors and is approved before energisation.

The EIS already accepts this for other risks

Appendix F commits to a Workforce Code of Conduct for contractors and subcontractors that includes 'adherence to site safety, biosecurity and access protocols' and 'removal from site' for breaches (SO4), annual audits of construction contractors for fire prevention (BF3), and contractor record-keeping for imported fill (SC8). The same approach should apply to biosecurity, with breaches, audits and fill records reported to landholders and costs recovered from the contractor and EnergyCo when a breach harms a property. The Code of Conduct doesn't say what happens to a landholder who is harmed.

Work and information requested

The EIS does not fulfil the SEARs requirement to fully assess biosecurity risks and how they can be mitigated. The Department should require EnergyCo to go back and do the following before the project is considered for

approval. EnergyCo should answer each issue in this submission one by one in the Submissions Report, say what has been changed and where, and re-issue EIS Section 13 and TR6 together so they agree.

1. **A real baseline.** A route-wide, property-level survey of weeds, pests and disease, published before approval, and a survey of the physical conditions at every excavation site in and near the Rouchel area (Issues A1, A3, B5, N1).
2. **The risk assessment DPIRD asked for.** The plant, animal and community risk assessment promised in AG5, covering foot and mouth disease, Japanese encephalitis, Q fever and tetanus as well as weeds, pests and anthrax, put on exhibition before approval and not left to a plan written afterwards (Issues A6 to A9).
3. **Reports that agree.** Risk scores, pest animal ratings, the count of high risks and the aerial agriculture findings reconciled between EIS Section 13 and TR6, with the reasons for any rating that was lowered because of an unwritten plan (Issues A2, A4).
4. **Plans that can be tested.** A draft general biosecurity management plan and a template property plan exhibited before approval, with wash-down standards, hold points, a chain of command, audits and enforcement, and landholders' own plans recognised (the plan sections of this submission).
5. **Anthrax done properly.** The assessment redone on site evidence, a named party to run and fund vaccination, fencing and extra management, the area defined and extended beyond Rouchel where vehicles travel, and the livestock and stock reserve risks assessed (Issues N1 to N3).
6. **Weed and pest control under the lines.** A property-by-property assessment of the aerial and ground control lost to the towers, and a funded, permanent alternative (Issue A10).
7. **Costs and responsibility.** Costed examples of breaches, a worst case, a cumulative assessment with the other projects, and a clear statement of who pays under the Emergency Animal Disease Response Agreement and for the losses it does not cover (Issues A5, A12).
8. **Workforce health and overseas workers.** Q fever and tetanus controls, and a foot and mouth disease protocol for any worker arriving from overseas (Issues A8, A9).
9. **Contractor accountability.** The biosecurity sub-plan of the Construction and Operational Environmental Management Plans made public, the principal contractor bound, the proponent liable, hold points that stop work and independent public audits, as EnergyCo has already accepted for other risks (CEMP section).
10. **The legal duty shown to be met.** The section 22 duty under the Biosecurity Act 2015 and the visitor obligations under the Biosecurity Regulation 2017 set out, with a demonstration that the project meets them.

We believe the current wording of the EIS does not protect landholders. Until this work is done, the Department cannot be satisfied that the biosecurity risks have been avoided, minimised or reduced to an acceptable level.

Where the information comes from

1. EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Environmental Impact Statement. References starting "EIS" are to Section 13 Agriculture and soils unless another chapter is named (project description 2.5.3.4 and 3.3.3.3, biodiversity chapter Table 7.10 and survey extent on page 225, aviation 17.2, environmental management Section 25, construction water demand, waste management, and Appendices A, E and F).
2. NSW Department of Primary Industries, African lovegrass management, Primefact 927, Luke Pope and Linda Ayres, May 2012. https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0019/320158/African-lovegrass-management.pdf
3. Australian Wool Innovation and Meat & Livestock Australia, Four Case Studies of Farmers Managing African Lovegrass in Grazing Systems, 3D Weed Management series, undated. https://www.wool.com/globalassets/wool/land/pastures/weed-and-pest-management/link-collection/african-lovegrass-case-studies.pdf
4. Tremain Ivey Advisory (Peter Tremain), Technical Report 6 Agriculture: Agricultural Impact Assessment, revision dated 7 September 2026. References starting "TR6" are to this report.
5. EnergyCo, Technical Report 20, Anthrax assessment (page numbers as printed in the report).
6. EnergyCo, Technical Reports 21 (Equine health) and 22 (Equine CIC assessment, HoustonKemp, September 2026). References starting "TR22" are to the latter.
7. EnergyCo, Frequently asked questions for the New England REZ Network Infrastructure Project, and Biodiversity fact sheet (October 2026).
8. NSW Biosecurity Act 2015, section 22 (general biosecurity duty); NSW Biosecurity Regulation 2017.
9. NSW DPIRD, come clean, leave clean and plant biosecurity guidance; DPIRD foot and mouth disease information; Australian Government Department of Agriculture, Fisheries and Forestry, foot and mouth disease vector transmission; AUSVETPLAN.
10. SafeWork NSW, Q fever workplace guidance; NSW Health, Q fever public health fact sheet and tetanus clinical guidelines; Australian Government Department of Health, CDNA national guidelines; Australian Immunisation Handbook.
11. NSW Government, Environmental Management Guidelines for Construction, and Environmental Management Plan Guideline for Infrastructure Projects (DPIE 2020).
12. NSW Department of Planning, Housing and Infrastructure, State significant infrastructure guidelines: Appendix B, Preparing an environmental impact statement. https://www.planning.nsw.gov.au/sites/default/files/2023-03/ssi-guidelines-preparing-an-environmental-impact-statement.pdf
13. NSW DPI, Biosecurity management plan (primary producers), including visitor compliance from 1 August 2019 and penalties. https://www.dpi.nsw.gov.au/biosecurity/your-role-in-biosecurity/primary-producers/biosecurity-management-plan
14. NSW Government, Weeds: vehicle and machinery hygiene. https://www.nsw.gov.au/regional-and-primary-industries/biosecurity/weeds/vehicle-and-machinery

15. NSW Farmers' Association, Submission 163 to the NSW Legislative Council inquiry into the feasibility of undergrounding transmission infrastructure for renewable energy projects, July 2023, section 4.2. https://www.parliament.nsw.gov.au/lcdocs/submissions/80184/0163%20NSW%20Farmers%27%20Association.pdf

16. SafeWork NSW, Q fever. https://www.safework.nsw.gov.au/hazards-a-z/biological-hazards-and-diseases/q-fever

17. Animal Health Australia, EADRA cost sharing. https://animalhealthaustralia.com.au/eadra/eadra-cost-sharing/

18. NSW DPI, Animal diseases of concern for NSW (anthrax). https://www.dpi.nsw.gov.au/dpi/biosecurity/animal-biosecurity/animal-diseases-of-concern-for-nsw2

19. Victorian Government, Transmission infrastructure and biosecurity factsheet. https://www.energy.vic.gov.au/__data/assets/pdf_file/0015/700107/Transmission-infrastructure-and-biosecurity-factsheet.pdf

20. NSW Department of Planning, SSI template conditions of approval, linear infrastructure (February 2023). https://www.planning.nsw.gov.au/sites/default/files/2023-02/ssi-template-conditions-of-approval-linear-infrastructure.pdf

21. EnergyCo, Training in Hay strengthens biosecurity for renewable energy projects, 5 June 2026. https://www.energyco.nsw.gov.au/training-hay-strengthens-biosecurity-renewable-energy-projects

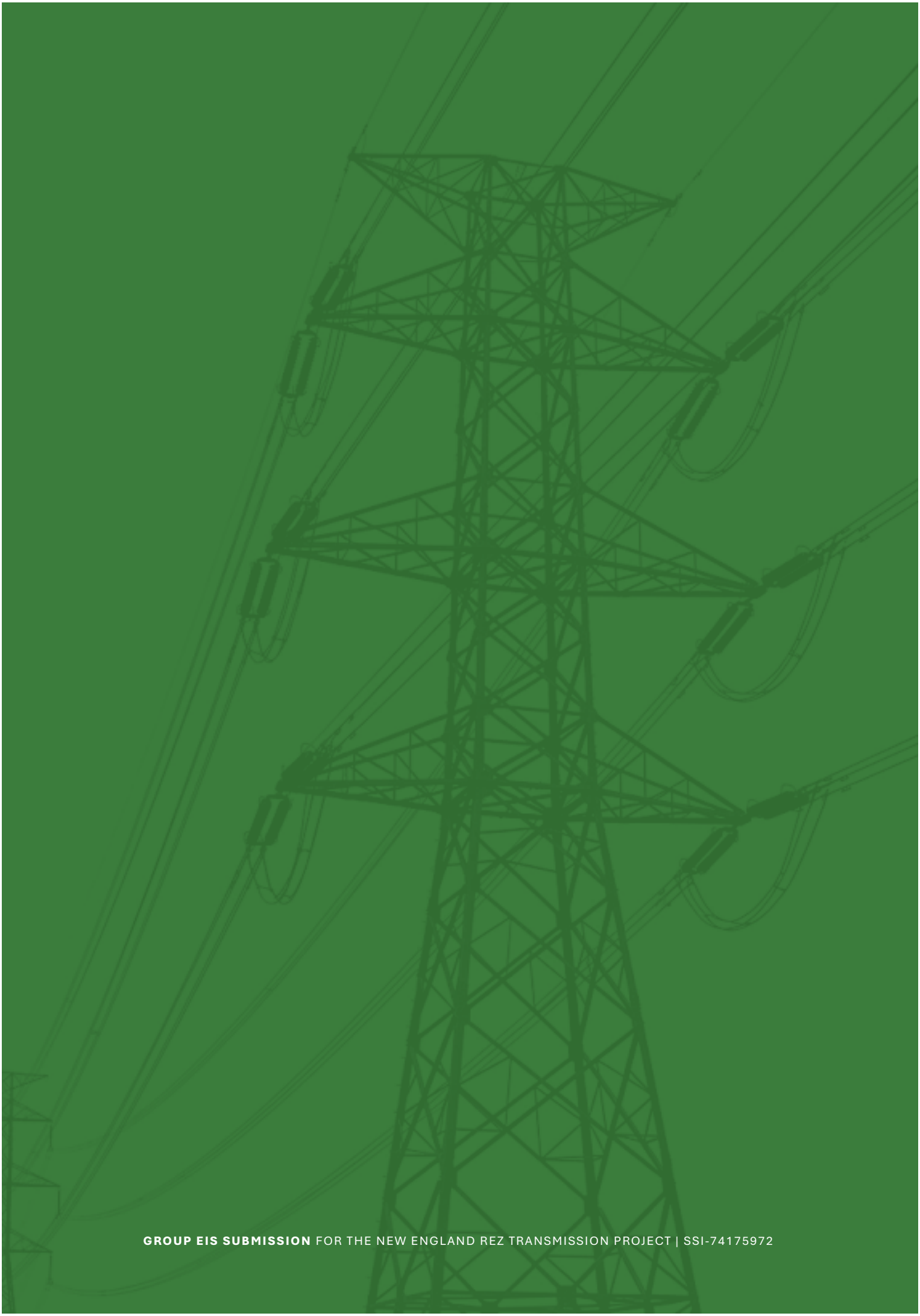
22. NSW DPIRD Agriculture, Advice on SEARs, New England REZ Network Infrastructure Project (SSI-74175972), letter to the Department of Planning, Housing and Infrastructure, 13 August 2024 (OUT24/12198). Its Attachment A lists NSW DPI, Biosecurity Risk Management in Land Use Planning and Development guide.

23. NSW Planning Portal, New England REZ Transmission Project (SSI-74175972), SEARs advice documents: Walcha Council, 13 August 2024; Upper Hunter Shire Council and Liverpool Plains Shire Council, 15 August 2024; Uralla Shire Council, 4 February 2026; Tamworth Regional Council, 12 March 2026. NSW Department of Planning, Housing and Infrastructure, Planning Secretary's Environmental Assessment Requirements (amended), SSI-74175972, issued 7 April 2026.

SECTION 13

Anthrax Disturbance

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 13

Anthrax Disturbance

Key issues we have found ...



Known anthrax ground is crossed

The route crosses properties with recorded anthrax sites, while historical outbreaks mean contaminated ground may extend beyond currently mapped locations.



Earthworks can expose buried spores

Excavation, access tracks and spoil handling can expose buried spores, while runoff and machinery can carry contaminated soil between properties.



High livestock risk remains

The assessment retains high livestock risk under realistic worst case conditions for access tracks, tower pads and laydowns, despite mitigation.



Residents need assessed protection

Landholders and neighbours need specific assessment of exposure through contaminated soil, dust and water, alongside enforceable protection throughout the works.



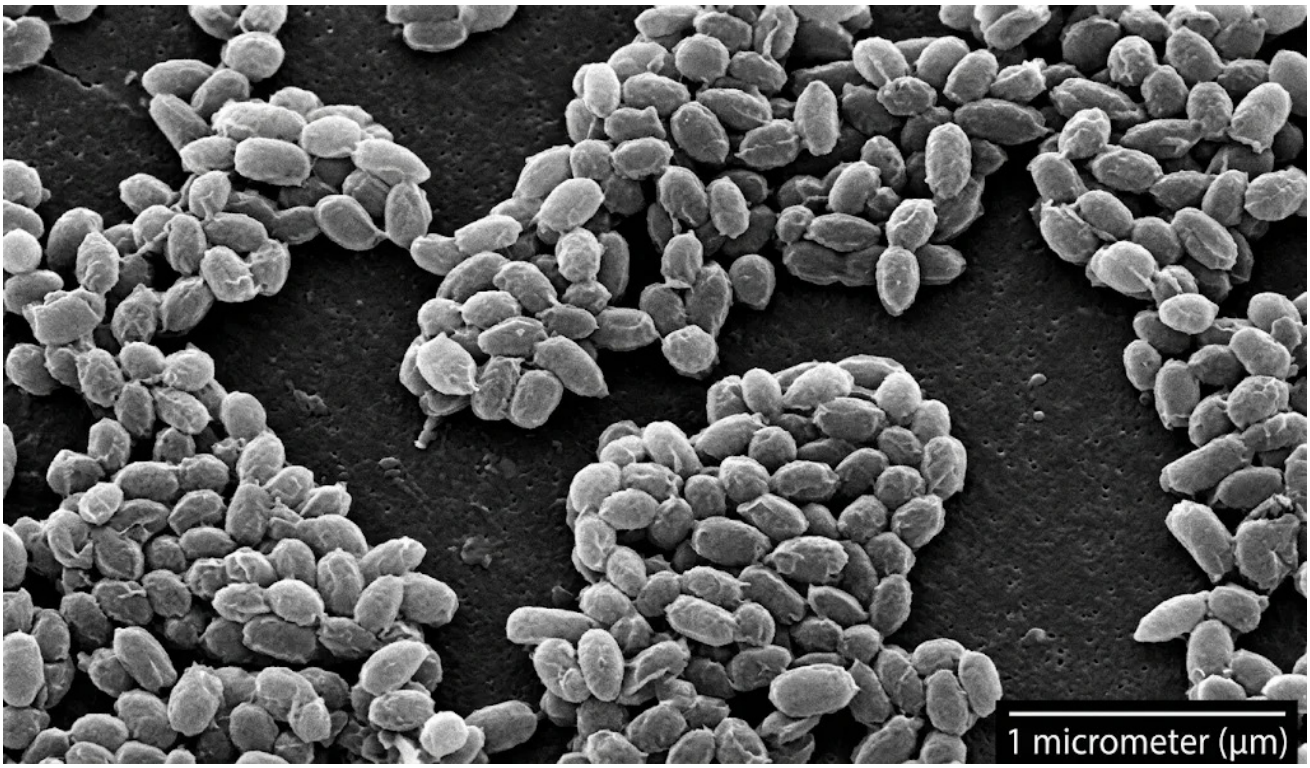
Outbreak costs remain unresolved

Stock losses, quarantine, grazing restrictions, vaccination and construction delays need costed planning, with responsibility and landholder compensation settled before approval.



Avoid the Rouchel anthrax area

The veterinary report recommends avoiding construction through the Rouchel anthrax area because livestock risks remain significant and practical safeguards unresolved.



> Anthrax spores

SECTION **13**

Anthrax disturbance

SUMMARY

Our community considers that the New England REZ Environmental Impact Statement (EIS) fails to adequately demonstrate how the project will mitigate the threat of a serious biosecurity concern - prolonged outbreak of anthrax disease associated with construction of the transmission line towers across an area of known endemic anthrax spore contamination.

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Construction of the proposed transmission lines through an area known to have an endemic risk of anthrax disease outbreak poses an unacceptable negative impact for the Hunter region during and after construction of the transmission lines and could potentially have a major impact on:

- the health of animals (cattle and horses) and humans (inhabitants of the Rouchel district and surrounding areas) from dust and water borne anthrax spores.
- economic livelihood of key industries in the region. This includes local agricultural (livestock) businesses and Equine CIC, as well as further 'downstream' industries in vineyard regions.

Our principal concerns are

1. How will local water supply be protected from dust born contamination?

The local residents of Rouchel generally rely on house tank water and allocations from Rouchel Brook as principal potable drinking water. The proposed construction of dual 70m tall transmission towers will result in significant airborne dust particles due to soil disturbance during construction of access roads, upgrading existing roads and clearing a corridor for transmission lines as well as excavation of soil for towers footplate and pylon footings (Source: Technical report 20).

> POSITION SOUGHT

EnergyCo must provide detailed analysis of water sources and potential mitigation strategies to prevent drinking water contamination.

We require Energyco to provide continuous monitoring of drinking water for LGAs associated with the Rouchel area and adjoining LGAs which might be impacted by waterborne spread.

2. How will they respond to increased risks from dust and vegetative loss during drought times?

Due to the cyclical climate variations (droughts and flooding rains) and the nature of the soil (alkaline calcareous soil) in the Rouchel region adjacent to Glenbawn dam, the region is known to favour persistence of anthrax spores in the soil for decades. (ref Durrheim et al 2017). 'Rouchel' is recognised as an endemic anthrax area and was the region of the last widespread outbreak in NSW (2007-2008), in which 1 horse and 53 cattle died before the outbreak was recognised and prophylactic vaccination processes were established.

The naturally occurring contributing factors included loss of vegetation due to drought, followed by cyclical flooding rain which washed exposed spores into creeks and gullies. Responsible agricultural practices (including reduced soil disturbances) have ensured no further outbreaks since then.

> POSITION SOUGHT

What mitigations strategies will be employed by EnergyCo during adverse weather events including drought and flooding rain.

Other proposed mitigation measures, such as 'Livestock exclusion fencing will need to remain until groundcover has fully re-established and soil matrix has stabilised

> Source: EIS

> QUESTION

How will EnergyCo determine that "groundcover has fully re-established and soil matrix has stabilised" ?

> POSITION SOUGHT

The community requires EnergyCo guarantee that they will continue to make reasonable and just compensation to affected landholders for this extended period of time?

3. Groundwater impacts have not been adequately addressed?

The recommended cleaning procedures for Construction workers and vehicles does not address how that water will be decontaminated after use. How will they prevent water contamination during the recommended regular daily process of decontamination of equipment? How will it be prevented from entering the groundwater and natural water courses, including gullies and brooks.

> POSITION SOUGHT

EnergyCo must demonstrate an achievable management plan for management of water resources, before approval is given.

4. Where does EnergyCo propose to store / reallocate the soil displaced during construction of towers?

EnergyCo have not provided information regarding the estimated quantity of soil removal required or how the soil from a potentially contaminated region will be separately stored.

Construction of pylons for the proposed transmission towers and associated soil disturbance due to clearing of trees and vegetation disturbance of deeper soil layers, will necessitate removal of tonnes of soil excavated to allow concrete footings. Based on estimates from other projects (Source: Victoria Western REZ, CWO REZ) - base footprints are likely to be 20m by 20m with four reinforced concrete piers disturbing the soil to an average depth of 15m. This likely would result in ~180cubic metres of earth removal per transmission line tower.

> POSITION SOUGHT

EnergyCo must provide accurate analysis of how much soil will be displaced for each transmission tower construction. EnergyCo must provide specific details regarding an appropriate relocation site for the potentially contaminated soil as well as strategies to prevent offsite contamination during transport.

5. EnergyCo has not provided a quantitative risk assessment for each of the potentially affected properties.

The Environmental Impact Statement makes general claims about 'risk mitigation' for anthrax (Source: EIS - AT1, page 549-550) which are not supported by the limited available evidence. The expert report (Technical Report 20) notes "several limitations" to the evaluation due to "limited published research" regarding anthrax disease and the "desktop based risk assessment conducted within a limited timeframe" and acknowledges that they were not able to conduct a site visit in time to generate their report – so were unable to properly assess the risk to landowners".

Although not specifically identified for privacy reasons, "Data provided by the DPIRD identified 58 anthrax sites across 15 properties in the Rouchel area, with the proposed transmission lines directly crossing four properties with known anthrax sites and remaining 11 properties affected by ancillary development" (Source: Technical report 20;P.17). "12 properties are associated with a significant water course – Rouchel Brook"- This contributes to significant potential downstream spread, which would increase during periods of heavy rain.

The report acknowledges that 'the social and financial impact on communities and their livestock from an anthrax outbreak have been high in some communities. An anthrax disease outbreak has wider ramifications for NSW in general, including negative impacts due to "outbreak response at state level, potential livestock trade disruption, and public perception"(Source: Technical report 20; P.7).

> POSITION SOUGHT

DPHI should require EnergyCo to produce a detailed, quantifiable property-specific Management Plan for each property, before approval is given for the project. It must provide reliable estimates for quantities of soil to be removed, and demonstrate acceptable extraction locations for the soil to avoid more distant contamination of other areas in the Hunter region. It is insufficient to say this will be done as part of the construction process, as this data also relates to the feasibility of the project

6. EnergyCo has not considered the increased chance of human infection in landholders with anthrax due to inhalation (dust) or ingestion (contaminated water).

Human anthrax infection is most often associated with a skin infection following contact with soil, allowing entry of the anthrax spore through even a minor skin abrasion. Other sources of infection are relevant to this project. **Inhalational anthrax** – can be associated with breathing in anthrax spores contaminating environmental dust. This project will be associated with significant soil disturbance and dust. This increased risk is acknowledged in the report and extensive recommendations made to protect Construction workers including - Protective clothing, masks and gloves while working, avoiding inhalation of dust and decontamination of clothing and equipment daily to reduce risk of inhalation exposure to anthrax (Source: EIS Technical Report 20). Inhalational anthrax has a high fatality rate. In 2001 in the USA, 22 cases of anthrax (11 inhalational, 11 cutaneous) were identified, linked to the bioterrorism 'mail' anthrax outbreak in the USA, where cross contamination occurred between individuals handling unopened mail containing *B. anthracis* spores. About 50% of cases died. (Hughes et al, Emerg Infect Dis. 2002 Oct;8(10):1013–1014).

Intestinal anthrax-gut ingestion has been rare in Australia but overseas outbreaks have been associated with drinking water supply contamination. It can lead to a generalised illness (septicemia). It has a fatality rate of 25% - 50%.

There are significant identified limitations in the assessment report (Technical report 20), relating to risk of human disease due to lack of available literature and desktop nature of the analysis. The report assumes that "landholders are not present on active construction sites" and their risk is limited to contact with affected livestock – patently not true.

> QUESTION

Why has EnergyCo not provided recommendations for personal risk management relating to landholders,farm workers and families, in addition to the recommendations they made for construction workers.

> POSITION SOUGHT

EnergyCo must provide expert advice regarding regarding reasonable mitigation strategies for all residents of the Rouchel area who will have prolonged exposure to increased anthrax risk. This should be ongoing as the risk of contamination remains after construction.

EnergyCo and DPI provide ongoing monitoring for individual residents / landholders within the Rouchel area to monitor for increased risk of all forms of anthrax.

7. The EIS fails to demonstrate ongoing commitment to mitigation strategies and management of any anthrax outbreak.

In the EIS, Energyco does not address the fact that some strategies will not be achievable, for example 'limiting the movement of displaced soil over large distances. Stockpiling and removal of large quantities of soil will be required for the proposed construction of transmission line towers and corridors.

The risk of anthrax is <u>not</u> limited to the period of construction but also ongoing potential exposure might continue over many years during and after the construction period. The report sights a "real risk of a livestock outbreak during several years of construction in the Rouchel area including during:

- access track construction
- site preparationand tower pad preparation
- construction laydown
- tower foundations
- post construction revegetation and maintenance.

> Source: EIS technical report 20

EnergyCo (source: Anthrax management and biodiversity fact sheet-April 2026) does not give any binding commitment but states they will undertake measures "where practicable". Most mitigation strategies centre on other agencies supporting landholders *after* an outbreak in livestock.

> POSITION SOUGHT

The community requires EnergyCo to having a binding commitment to mitigate risks of anthrax outbreak.

Veterinary Perspective
Anthrax – Animal Impacts

Introduction

I am a veterinarian with twenty five years of experience in cattle and sheep practice. This report sets out my views on the anthrax biosecurity risk associated with the New England REZ Network Infrastructure Project. It is provided for the Anthrax section of a community submission on the project's Environmental Impact Statement.

Summary of Opinion

The Upper Hunter has a long history of anthrax. The disease was endemic in the Hunter Valley in the 1890s, and stock losses were recorded in the Upper Hunter as recently as 1939. In December 2007 and January 2008, 53 cattle and a horse died on 11 properties around Rouchel after a drought was broken by severe flooding. NSW DPIRD records 58 anthrax sites on 15 properties in the Rouchel district. The proposed transmission line crosses four of these properties, and construction overlaps recorded anthrax sites.

The soils, landform and climate at Rouchel are well suited to the long-term survival of anthrax spores.

Anthrax outbreaks in livestock are most often triggered by soil disturbance and by extreme weather that moves soil. The project will involve extensive excavation, access track and road construction, and stockpiling of spoil over several years, in an area where both triggers are present.

The EIS anthrax assessment by Ausvet and Public Health Matters (Technical Report 20) is a careful and transparent piece of work. Its findings are serious. Even with all recommended mitigations in place, it rates the realistic worst-case risk to livestock as High for access tracks, tower pads and laydown areas. It concludes that there is a real risk of an occasional livestock outbreak during construction.

The mitigations recommended in the assessment have not yet been committed to by EnergyCo in a form that is specified, funded and enforceable. Several of the limitations the authors openly acknowledge have not been addressed.

My primary recommendation is that the project should not proceed with construction through the Rouchel anthrax area. If that recommendation is not accepted, the further work set out in section 9 should be completed before any decision is made.

Anthrax and soil disturbance

Anthrax is a soil-borne disease. Any project that moves large volumes of soil in a historically infected district creates a pathway for infection that does not exist when the ground is left undisturbed.

For this reason, the central recommendation for preventing anthrax in livestock is to minimise soil disturbance, particularly in areas with a known history of the disease. Animal health authorities advise landholders in anthrax areas to minimise excavation, ploughing and earthworks, to avoid disturbing old burial sites, stock camps and low-lying ground, and to keep livestock away from recently disturbed soil. Where disturbance is unavoidable, they advise vaccinating stock and monitoring closely for sudden deaths

(Business Queensland; NSW DPIRD). DPIRD's own statement in EnergyCo's April 2026 fact sheet emphasises avoiding disturbance of contaminated sites and managing soil movement. A transmission project of this scale runs directly against this advice.

Bacillus anthracis multiplies in the host and causes a rapidly fatal septicaemia, most often in cattle and sheep, which are usually found dead. When a carcass is opened by scavengers, decomposition or handling, the organism is exposed to air and forms spores. These spores enter the soil and can remain viable for decades.

Spores below about 15 cm are protected from sunlight, drying and competition from other soil organisms, and survive longest. Historically, carcasses in NSW were buried or partly burnt. Old disposal sites therefore hold spores at the depths reached by tower foundations, trenching, cut and fill for access tracks, and borrow pits. AUSVETPLAN notes that spores below 15 cm can remain viable for long periods, even centuries, and that viable organisms have been grown from spores held in favourable subsoil for around 200 years. It records two outbreaks that began when spores, washed into the soil at old knackery and tannery sites, were brought to the surface decades later by deep ploughing. It also states that disturbance of soil by flood damage or ploughing may expose previously buried spores (Animal Health Australia 2020).

Livestock are infected mainly by ingesting spores while grazing, so soil disturbance is central to the risk. Excavation can bring long-buried spores to the surface, while stockpiling, runoff, dust and soil carried on machinery can move contaminated material beyond its original location. The 2007 Rouchel outbreak followed severe flooding that exposed and redistributed soil across the landscape. Construction creates the same mechanism of risk by exposing buried soil and moving it through excavation, access works, spoil handling and machinery movements. These activities increase the opportunity for viable spores to be brought into areas accessible to livestock.

Anthrax is a zoonosis. People can be infected through contact with infected animals, carcasses or contaminated soil. Landholders handling dead stock, veterinarians, and construction workers disturbing contaminated soil are at risk.

History of Anthrax in the Upper Hunter

Anthrax was introduced to Australia near Sydney in 1847 and spread along stock routes through NSW. It was regarded as endemic in the Hunter Valley during the 1890s. Losses were recorded on three Upper Hunter properties in 1939 (Durrheim et al. 2009, citing Seddon 1953).

In June 2007, after a prolonged drought, 259 mm of rain fell near Aberdeen over about three days, against a three-year June average of 43 mm. Large amounts of topsoil were washed into gullies and creeks. Between 14 December 2007 and 3 January 2008, 53 cattle and one horse died of anthrax on 11 properties in the Rouchel area, about 20 km east of Aberdeen. A further case occurred in May 2008 in an unvaccinated bull brought onto an infected property. All stock on the infected properties and 24 neighbouring properties were vaccinated (Durrheim et al. 2009).

The investigating team found no source in imported feed or stock and concluded that long-lived soil spores, exposed by the flooding, were the likely cause. Anthrax was not suspected at first because of the long absence of recorded cases. The authors also raised the possibility that low-level, undiagnosed infection had continued in the district since the 1940s.

> Credit - With thanks for expert input from Dr Margaret Burgess, Emeritus Professor Paediatrics & Preventive Medicine, University of Sydney

The 2007 outbreak shows four things that are directly relevant to this project:

- anthrax recurred after 68 years without a recorded case, which is consistent with long-term persistence of spores in the environment;
- the trigger was large-scale movement of soil;
- the outbreak affected a landscape of about 60 km2, not a single paddock;
- Rouchel lies about 350 km outside the traditional NSW anthrax belt, so maps of the belt understate the risk in the Upper Hunter. Barro et al. (2016) has since redefined the anthrax belt to include parts of the Upper Hunter.

Case records in NSW are reasonably complete only from about 1990, although district records go back to the early 1900s (Moloney and Salmon 2015). The same authors note that owners of newly diagnosed properties often recall occasional unexplained deaths in the same paddock over many years. Recorded sites are therefore likely to understate the true extent of contaminated ground. The EIS assessment acknowledges this, noting that older outbreaks may not be included in DPIRD's GPS records.

Soil suitability

Anthrax spores persist best in neutral to alkaline soils with high calcium, moisture and organic matter, and in warm conditions (Van Ness 1971; Hugh-Jones and Blackburn 2009). Calcium helps maintain spore viability (Dragon and Rennie 1995). Spores tend to accumulate in drainage lines, seepage areas and depressions.

The Rouchel area has alluvial soils along the creeks and basaltic and sandy soils on the slopes (Durrheim et al. 2009). Basalt-derived soils in the Upper Hunter are generally clay-rich and calcium-rich, with neutral to alkaline pH. The EIS assessment itself states that Rouchel soils are neutral to alkaline and suitable for spore persistence. The country is hilly, with gullies that run after rain, and 12 of the 15 properties with recorded anthrax sites adjoin or are crossed by Rouchel Brook.

In my opinion the corridor through Rouchel, Rouchel Brook, Upper Rouchel and McCullys Gap should be treated as ground with a proven capacity to hold viable spores for decades.

Risk of disease and risk factors

NSW DPIRD identifies a previous history of anthrax on a property as the single greatest risk factor for an outbreak. That factor is present on the properties crossed by this project.

The recognised risk factors present at Rouchel include:

- a recorded history of anthrax on the affected properties;
- soils and drainage suited to spore survival;
- a climate with recurring drought followed by heavy rain;
- hot summers, when stock graze close to the ground;
- stock that are likely to be unvaccinated;
- a low level of suspicion among owners, as seen in 2007;
- horses, for which there is no registered anthrax vaccine in Australia, in an area that includes the Upper Hunter Equine Critical Industry Cluster.

The project adds the following construction-specific risks:

- deep excavation for tower foundations;
- long, continuous strips of disturbed soil for access tracks and road upgrades;
- spoil stockpiles and sediment basins, which concentrate soil and water in conditions that favour spores;

- a laydown area reportedly located at Rouchel Brook;
- movement of machinery, spoil and workers between properties and districts along a corridor of about 300 km;
- changes to fencing, water access and grazing that can push stock onto poorer ground;
- ongoing soil disturbance from easement maintenance over the life of the asset.

The consequences of an outbreak are serious:

- deaths of stock;
- quarantine and movement restrictions;
- carcass destruction;
- vaccination of stock on infected and surrounding properties;
- tracing and ongoing surveillance;
- possible damage to the reputation and trade of the district, including the thoroughbred industry;
- a risk to human health.
  The EIS assessment rates the consequence as high to extreme, and I agree.

Comment on the EIS anthrax assessment and how it has been represented

Technical Report 20, Anthrax Assessment and Management Strategy for New England REZ Project (Ausvet Pty Ltd and Public Health Matters Pty Ltd, September 2026), uses a recognised risk assessment framework based on the World Organisation for Animal Health Terrestrial Code. It is candid about its limitations. My concerns are not with the assessment itself. They relate to how its findings have been represented by EnergyCo, and to the work and commitments that are still missing.

What the assessment found

Even with all recommended mitigations in place, the assessment rates the realistic worst-case risk to livestock (Table 1) as:

- High for access tracks;
- High for site preparation and tower pads;
- High for construction laydown areas;
- Moderate for tower foundations;
- Moderate for post-construction revegetation and maintenance.

The authors conclude that mitigation cannot reduce the risk to very low or negligible in every scenario, and that there is a real risk of an occasional outbreak in livestock during the several years of construction at Rouchel. They identify drought followed by heavy rain as a realistic worst case, which is the sequence that preceded the 2007 outbreak at the same location. In my opinion, however, construction largely removes the need for drought as part of that sequence. Drought strips pasture cover and exposes topsoil, as the assessment itself notes. Excavation, track construction and stockpiling do the same thing directly, and also expose deeper soil where spores are best preserved. On disturbed ground, heavy rain alone could be enough to mobilise spores and trigger an outbreak, in any season. AUSVETPLAN notes that cases are sometimes seen after only moderate rainfall following prolonged dry periods, and that spores, which can float, may concentrate in low-lying areas after heavy rain (Animal Health Australia 2020). This makes the worst case more likely during construction than under normal farming conditions. For human health, the risk from contact with infected animals or carcasses remains Moderate in the most likely case and High in the worst case after mitigation (Table 3).

How the findings have been represented

EnergyCo's April 2026 anthrax fact sheet told landholders it expected the risk of anthrax being encountered and spread during construction to be low. Its April 2026 community feedback report described the likelihood as very low. In my opinion these statements are not consistent with the assessment's findings of a High residual risk under realistic worst-case conditions and a high to extreme consequence. Landholders and the consent authority should be guided by the technical findings.

Limitations acknowledged by the authors

The authors are open that:

- the assessment was desktop-based and completed in a limited timeframe;
- site access was not possible;
- expert opinion was relied on because data on construction-related anthrax risk are scarce;
- older outbreaks may not be included in DPIRD's records;
- the assumption that landholders face lower risk than workers could not be confirmed and should be reassessed when construction begins.

These are fair statements of uncertainty, but they mean important questions remain unanswered at the point of approval. The detailed report on which the summary is based has also not been exhibited. In disease control, when the consequences of an outbreak are serious and the evidence is limited, the sound approach is to avoid the risk rather than proceed and attempt to manage an outbreak if one occurs.

History and the location of contaminated ground

The assessment's spatial analysis draws on DPIRD's records of recent cases. The full history of the district, set out in section 4, should also be compiled and considered, because it bears directly on where contaminated ground may lie.

The assessment describes how flooding brings buried spores to the surface and disperses them, and how drought exposes topsoil. Combined with the likelihood of unrecorded historical sites, this means the location of contaminated ground cannot be known with confidence. Avoiding known sites by GPS is an important measure, but it cannot be relied on alone. The other recommended controls (vaccination, fencing, soil and water management) will need to be applied across the whole Rouchel section, not only near recorded sites.

Scale of the works

The assessment identifies access tracks and surface groundworks as among the highest-risk activities. The EIS should state the extent of this work in the Rouchel area:

- kilometres of new and upgraded track and road;
- number of tower sites;
- excavation depths;
- volumes of cut, fill and surplus spoil;
- total area disturbed;
- how long ground will remain bare.

Without these figures, the exposure cannot be properly understood.

Mitigation and practical limitations

Mitigation measures

Technical Report 20 recommends avoidance of known anthrax sites, vaccination, exclusion fencing, runoff and erosion controls, retention of excavated soil, equipment hygiene, surveillance and emergency response. These measures do not remove the livestock risk. EnergyCo's own assessment retains a High residual risk for access tracks, tower pads and laydown areas under realistic worst-case conditions.
The important question is whether these controls can be implemented effectively over the scale and duration of the works in the Rouchel area.

Exclusion fencing

Livestock should be excluded from disturbed ground, but the area requiring exclusion may extend beyond individual tower pads and tracks. Soil can be moved by machinery, runoff and erosion into adjoining areas. The EIS should define the area to be fenced, how long livestock will be excluded, and the standard required before grazing can resume. Extensive fencing has the potential to interfere with stock movement, access to water and normal property management. Access roads and much of the earthworks will be permanent, so exclusion may be needed for many years. Because the project is linear, continuous fencing along easements and roads would divide properties and could seriously reduce their productive capacity and value.

Runoff and erosion

Runoff is particularly important because water can move contaminated soil beyond the original excavation. The project should identify how runoff and sediment from disturbed ground will be managed during major rainfall events, including where contaminated sediment will be retained and what will occur if erosion and sediment controls are overtopped or fail. Downstream and neighbouring grazing land must also be considered where runoff can leave the construction area.

Excavated soil and spoil

Technical Report 20 recommends that excavated soil remain at the immediate construction site. This reduces the risk of transferring contaminated soil elsewhere, but it leaves disturbed soil on the affected property. EnergyCo should identify how much spoil will be generated, where it will be placed, how it will be stabilised and protected from erosion, and when livestock will be allowed access to those areas. Potentially contaminated soil should not be moved to another property or construction site without specific biosecurity assessment and approval.

Vaccination

Vaccination is an important control for cattle and sheep, but it should supplement rather than replace control of soil disturbance. Use of the vaccine requires approval under the authority of the Chief Veterinary Officer, obtained in NSW through the Local Land Services district veterinarian. NSW DPIRD guidance is that cattle and sheep be vaccinated annually for three years after anthrax is diagnosed on a property, and that vaccination is recommended where anthrax has occurred in the previous ten years. A single dose is usually effective for 6 to 12 months, provided the full dose is given and the animals are not treated with antibiotics within 10 to 14 days before or after vaccination. Immunity peaks around 15 days after vaccination. On heavily contaminated premises, deaths have continued for up to 60 days after vaccination, and in the 1997 Victorian outbreak some vaccinated animals still died. Vaccination can cause a fever 12 to 36 hours afterwards, reduced milk yield and possibly abortion in dairy cows, and care is needed when vaccinating in hot weather.

Vaccinated stock are subject to a 42-day meat withholding period, which restricts when they can be sold. Annual mustering, vaccination and the withholding period would be an ongoing cost and constraint on affected properties for as long as disturbed ground remains a risk. Severe vaccine reactions can occur in horses, and no anthrax vaccine is registered for them, which is relevant to affected equine enterprises (Animal Health Australia 2020; NSW DPIRD).

Machinery and surveillance

Soil carried on machinery provides a pathway for transfer between paddocks and properties. A clear decontamination standard is required for vehicles and plant leaving known or suspected anthrax areas, including management of soil and wash-down material. Surveillance is necessary, but it detects disease after exposure has occurred. There must also be an agreed protocol for investigation of sudden deaths, immediate notification to NSW DPIRD and Local Land Services, stop-work authority and management of an affected site.

Cost of an outbreak

The assessment recommends that all work stop immediately on a suspected or confirmed case. The 2007 outbreak produced cases over several weeks and again five months later, so a similar event could halt work for months. The EIS does not estimate this delay or its cost. It also does not commit to compensating landholders for stock losses, quarantine and vaccination costs arising from an outbreak linked to the works. Under AUSVETPLAN, an infected property remains in quarantine for at least 20 days after the last case, and vaccinated stock on infected and neighbouring properties cannot be moved until restrictions are lifted. Where cases occur on more than five properties in an area within a short time, the Chief Veterinary Officer may declare an unusual outbreak and a vaccination area, in which all properties are quarantined with a mandatory movement embargo. AUSVETPLAN also notes that public concern about an outbreak can lead to boycotts of livestock markets and local events.

The mitigation measures proposed in Technical Report 20 are necessary, but EnergyCo's own assessment shows that they do not eliminate the livestock risk. Avoiding disturbance of historically anthrax-affected ground remains the most effective control.

Recommendations

Primary recommendation

The consequence of an outbreak is high to extreme, and EnergyCo's own consultant has identified a residual risk that cannot be mitigated to a low level. The established advice is to minimise soil disturbance in anthrax areas. In my opinion, the project should not proceed with construction through the Rouchel, Rouchel Brook, Upper Rouchel and McCullys Gap anthrax area.

If the consent authority does not accept this recommendation, the following should be completed and exhibited before any determination is made:

a. publication of the full detailed anthrax risk assessment;
b. site investigation for B. anthracis at proposed tower, pad, laydown, track and road locations, carried out to a design agreed with DPIRD;
c. a full historical review of anthrax in the Upper Hunter and along the corridor, including district and Local Land Services records and landholder knowledge of unexplained deaths and burial sites;
d. quantification of the works in the Rouchel area as set out in paragraph 7.8;

e. an estimate of the likelihood of heavy rainfall on exposed and disturbed soil over the full period of construction and stabilisation, based on Bureau of Meteorology records;
f. an assessment of spore transport along Rouchel Brook and the risk to downstream and neighbouring properties;
   an assessment of the risk to landholders and their families;
g. a costed outbreak scenario covering landholders, the state response and the project.

References

Animal Health Australia (2026). Response strategy: Anthrax (version 5.1). Australian Veterinary Emergency Plan (AUSVETPLAN), edition 5, Canberra, ACT. https://animalhealthaustralia.com.au/download/2394

Ausvet Pty Ltd and Public Health Matters Pty Ltd (2026). Anthrax Assessment and Management Strategy for New England REZ Project, Project report summary (Technical Report 20). Prepared for EnergyCo.
Barro A.S. et al. (2016). Redefining the Australian anthrax belt. PLoS Neglected Tropical Diseases 10: e0004689.

Business Queensland. Managing anthrax risk. https://www.business.qld.gov.au/industries/farms-fishing-forestry/agriculture/biosecurity/animals/diseases/anthrax/manage

Dragon D.C. and Rennie R.P. (1995). The ecology of anthrax spores: tough but not invincible. Canadian Veterinary Journal 36: 295-301.

Durrheim D.N., Freeman P., Roth I. and Hornitzky M. (2009). Epidemiologic questions from anthrax outbreak, Hunter Valley, Australia. Emerging Infectious Diseases 15: 840-842.
https://wwwnc.cdc.gov/eid/article/15/5/08-1744

EnergyCo (2026). Anthrax management and biosecurity fact sheet, April 2026.
https://www.energyco.nsw.gov.au/sites/default/files/2026-04/new-england-rez-fact-sheet-Anthrax-management-biosecurity-April-2026.pdf

EnergyCo (2026). New England REZ community feedback report, April 2026.
https://energyco.nsw.gov.au/sites/default/files/2026-04/Feedback%20report%20(April%202026).pdf
Hugh-Jones M. and Blackburn J. (2009). The ecology of Bacillus anthracis. Molecular Aspects of Medicine 30: 356-367.

Moloney B. and Salmon D. (2015). Relevance of historical anthrax data in current property risk assessments. Flock and Herd. https://flockandherd.net.au/cattle/reader/anthrax-historical-data-relevance.html
NSW Department of Primary Industries and Regional Development. Anthrax.
https://www.dpi.nsw.gov.au/biosecurity/animal/humans/anthrax

Seddon H.R. (1953). Anthrax. In Diseases of Domestic Animals in Australia, Part 5, Vol. 1. Department of Health, Canberra.

Van Ness G.B. (1971). Ecology of anthrax. Science 172: 1303-1307.

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SECTION 14

Traffic and Transport

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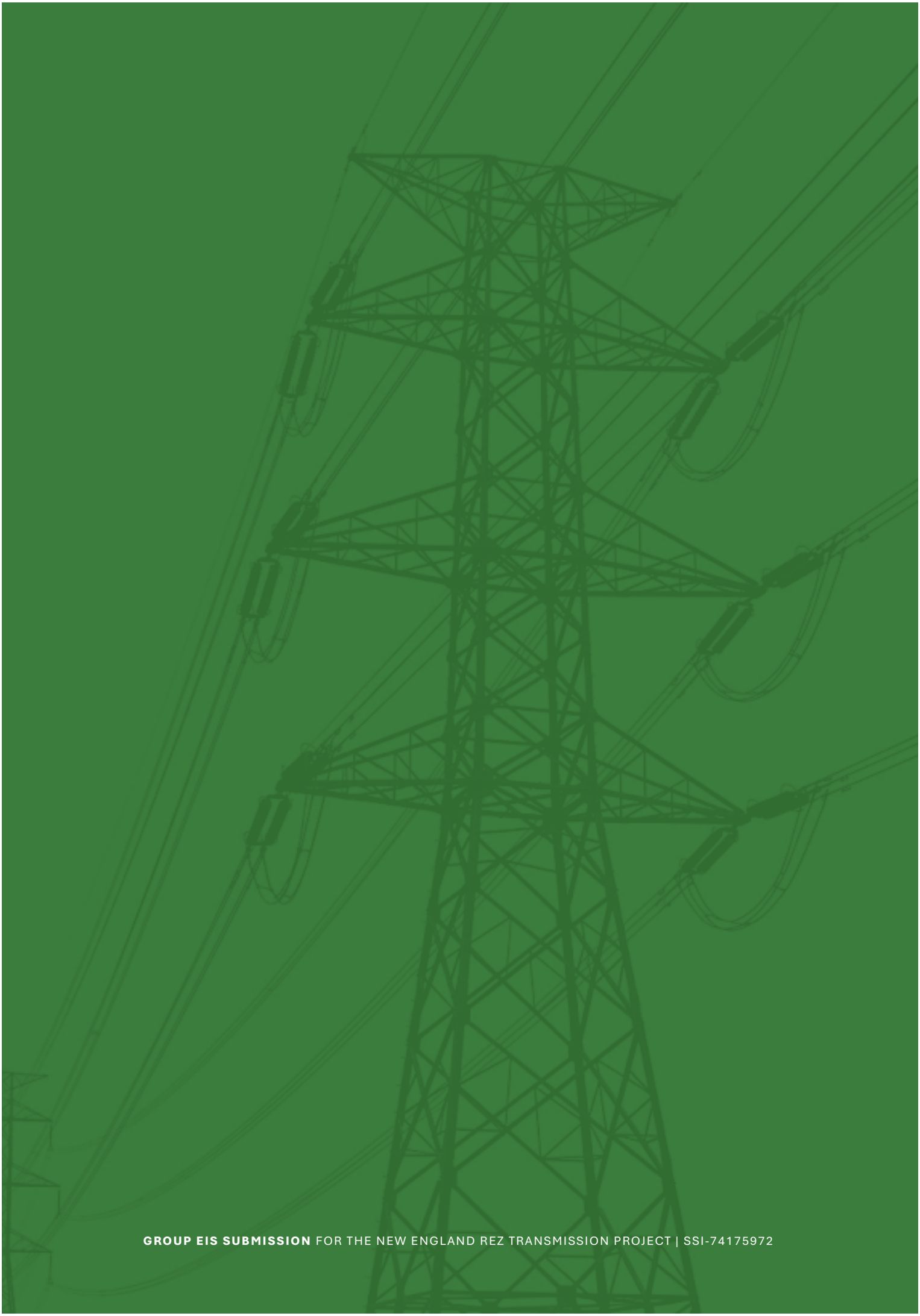

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SECTION 14

Traffic and Transport

Key issues we have found ...



Traffic figures do not reconcile

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



Prove roads can carry loads

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



Protect school and farm access

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



Cumulative traffic assumptions need retesting

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



Road damage needs funded remedies

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



Safeguards must precede enabling works

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

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Read in more detail >



> Cumulative traffic a sumptions need retesting

SECTION **14**

Traffic and Transport: Evidence, EIS Deficiencies and Required Actions

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

SUMMARY

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

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

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

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

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

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

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

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

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1 | Assessment requirements and status of agency advice

Evidence and EIS shortcomings

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

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

> POSITION SOUGHT

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

2 | Unreconciled high-risk OSOM movement figures

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

> POSITION SOUGHT

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

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

4 | Unapproved route sections and reliance on other projects

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

7 | Agricultural peak traffic has not been clearly assessed

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

8 | Conflicting intersection treatments and other assumptions

Evidence and EIS shortcomings

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

> POSITION SOUGHT

Position sought

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

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

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

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

Evidence and EIS shortcomings

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

> POSITION SOUGHT

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

16 | Incomplete construction traffic distribution summary – Section 6.6.3

Evidence and EIS shortcomings

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

> POSITION SOUGHT

Position sought

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

Supporting comparison table — identified intersection discrepancies

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

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

> POSITION SOUGHT

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

Intersection design comparison — retained from full master

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

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

Evidence and EIS shortcomings

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

Supporting comparison — categorisation, safety constraints and agency expectations

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

Required actions and evidence before determination

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

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

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

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

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

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

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

Reason for determination-stage response

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

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

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

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

> POSITION SOUGHT

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

Mitigation categories and agency advice — retained from full master

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

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

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

Evidence and EIS shortcomings

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

27 | Construction-overlap timing and local cumulative peak scenarios

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

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

> POSITION SOUGHT

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

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

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

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

> POSITION SOUGHT

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

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

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

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

> POSITION SOUGHT

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

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

> REQUIRED ACTION BY ENERGYCO — SECTION 34.1

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

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

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

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

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

> REQUIRED ACTION BY ENERGYCO — SECTION 38.1

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

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

Evidence and EIS shortcomings

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Department is therefore requested to require EnergyCo to:

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

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

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

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

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

> POSITION SOUGHT

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

The Department is therefore requested to require EnergyCo to:

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

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

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

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

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

> POSITION SOUGHT

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

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

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

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

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

Evidence and EIS shortcomings

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

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

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

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

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

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

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

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

The EIS itself identifies locations within Uralla Shire where high construction traffic increases are expected over long durations. It also acknowledges potential road safety risks, deterioration of road infrastructure, disruption to access and the need for specific traffic management and safety measures.

These findings require location-specific evaluation and effective mitigation.

The cumulative assessment must adequately incorporate relevant nearby developments. As identified in earlier sections of this submission, five substantial renewable energy and storage developments appear not to have been individually incorporated into the cumulative project register.

Transport for NSW's formal advice requires consideration of cumulative traffic from relevant projects at EIS and approved stages in applicable turn-warrant assessments, as well as detailed consideration of intersection safety, access arrangements and rural agricultural traffic conditions.

Where relevant cumulative traffic has not been incorporated, EnergyCo must explain how it can demonstrate that its mitigation measures remain adequate.

The amended SEARs require the EIS to assess relevant environmental, social and cumulative impacts and describe how issues raised through engagement were considered and influenced the project design.

The existence of a mitigation schedule does not establish that mitigation is adequate unless it can be demonstrated that the measures are appropriate for the impacts identified and will be implemented in time to prevent or minimise those impacts.

The Department is therefore requested to require EnergyCo to:

1. Provide a documented, item-by-item response to the community mitigation document emailed on 5 September 2026, including the assessments undertaken, decisions made and reasons for any rejection or modification of requested mitigation.
2. Explain how the findings from that document were incorporated into the EIS before finalisation on 2 October 2026, including any changes to the design, traffic assessment or mitigation commitments.
3. Demonstrate that the cumulative traffic assessments and proposed road upgrades appropriately account for all relevant renewable energy and storage developments.
4. Provide location-specific assessments of impacts along Thunderbolts Way, within Salisbury Plains and at affected rural property entrances and school bus stopping locations.
5. Demonstrate compliance with the relevant requirements of Transport for NSW, including cumulative turn-warrant assessments, intersection safety, rural agricultural conditions and appropriate access treatments.
6. Identify the measures required to address heavy vehicle noise, property access, road safety, drainage, agricultural operations and the cumulative loss of rural amenity.
7. Establish clear responsibilities, funding arrangements and completion dates for essential mitigation works.
8. Reassess the conclusion in Section 9.3.1 and explain whether the description of impacts as localised, temporary and manageable remains justified after consideration of the outstanding matters.

It is not sufficient for EnergyCo to conclude that impacts are manageable without demonstrating how the identified impacts will actually be managed for the people who experience them.

The residents and farming families of Salisbury Plains provided EnergyCo with detailed notice of foreseeable risks and requested practical mitigation before the EIS was finalised.

The Department should require EnergyCo to demonstrate that this information was substantively considered and that the proposed mitigation addresses the resulting impacts.

Until that evidence is provided, the conclusion in Section 9.3.1 should not be accepted as adequately substantiated for the affected Salisbury Plains community.

> POSITION SOUGHT

Reassess the §9.3/Chapter 10 description of impacts as localised, temporary and manageable against the specific mitigation concerns communicated before EIS finalisation and corrected cumulative traffic information. Publish a response matrix and revised residual-impact findings showing which measures are necessary, funded, approved and actually deliverable.

44 | Consolidated assessment of the reliability of the traffic and transport conclusions

Evidence and EIS shortcomings

Chapter 10 of Technical Report 7 should be read against the detailed evidentiary questions raised in Sections 1–43 and 45–47 of this submission. Those sections identify issues concerning OSOM quantities and route approvals; contradictory intersection treatments and sight-distance deficits; vehicle and workforce traffic assumptions; rural school bus, agricultural and property access; bridge, culvert and road structure capability; cumulative developments and traffic; and the enforceability of proposed mitigation. It is not necessary to repeat each issue here. Their individual source citations and corrective actions form the record against which the overarching conclusion must be tested.

The key concern is whether the report's broad conclusion that transport impacts would remain localised, temporary and manageable is supported for the actual roads, farms, school bus stops and households carrying the greatest burden. A road network may retain spare traffic-flow capacity while specific intersections, bridges, rural property entrances or communities experience unacceptable or unmitigated safety and access risks. Where the figures or assessments identified earlier are materially corrected, the corresponding Chapter 10 impact ratings and conclusions must also be reassessed.

A revised assessment must also demonstrate how EnergyCo substantively considered the Salisbury Plains community mitigation material submitted on 5 September 2026 and the technical, agricultural, noise and social-impact evidence. The submission does not assert that every additional project is certain to be built or will use every route; it requires transparent screening, reasonable sensitivity testing and reasoned explanations for exclusions. Equally, a reference to a later permit or management plan is not itself evidence that necessary road works, technical assessments or funding are secured.

The Department should require a corrected Chapter 10 conclusion supported by a traceable evidence and mitigation register linked to the section-by-section actions in this document. Material revisions should be subject to meaningful input from TfNSW, councils, affected bus operators and landholders before the Department relies on them to determine project impacts.

> POSITION SOUGHT

Revise the Chapter 10 transport conclusion only after documenting the disposition of all outstanding findings and agency/community concerns in Sections 1–43 and 45–47. Publish a traceable source-to-conclusion reconciliation, revised residual impact ratings where warranted, and the secured mitigation and approval requirements necessary for the Department to rely upon those conclusions.

45 | Failure to distinguish permanent and temporary road and intersection disturbance — private property impacts and Inglewood Road

Evidence and EIS shortcomings

> References: Technical Report 7, Sections 6.7.2 and 9.3, Tables 9-2 and 9-3, Appendices G, H and K (particularly drawings IS_MSC_06 and IS_MSC_08); main EIS Sections 3.2, 3.3.5, 3.3.6 and 6.4; amended SEARs (7 April 2026), pp. 1–2, 4 and 6; Transport for NSW amended advice (11 February 2026), Attachment A, pp. 3–6. Sections 19, 26, 34.1, 35 and 42 of this submission are also relevant. Appendix K drawings IS_USC_05 (New England Highway/Glenburnie Road; PDF p. 389) and IS_WAC_07 (Oxley Highway/Ruby Hills Road; PDF p. 344) are additional specific examples; see Section 46 on acquisition.

It is a serious deficiency in the exhibited transport assessment that EnergyCo proposes intersection treatments at approximately 57 locations and road upgrades affecting 31 public roads, yet numerous Appendix H drawings identify land only as “Disturbance Footprint” or “Land Impacted (Indicative)” without clearly disclosing whether the mapped works involve temporary construction occupation, permanent pavement or intersection widening, permanently altered drainage or access, vegetation removal, modification of the public road reserve, acquisition or occupation of private land, or land that must be reinstated. The main EIS distinguishes an approximately 3,579-hectare project-wide construction disturbance footprint from an approximately 471-hectare permanent operational footprint; those regional figures are not a property-specific reconciliation and do not allow individual residents to determine the ultimate status of land adjoining public-road works. Importantly, the EIS biodiversity classifications “Disturbance Area A” and “Disturbance Area B” describe the degree of vegetation clearing, NOT whether impacts are permanent or temporary. Inglewood Road illustrates the real and foreseeable consequences of this ambiguity: Technical Report 7 proposes full-length sealed widening by up to two metres to support construction traffic associated with workforce Camp 1; Appendix H drawings IS_MSC_06 (Inglewood Road/Beggary Creek Road) and IS_MSC_08 (Muscle Creek Road/Inglewood Road) show indicative disturbance in close proximity to an existing residence, driveway and associated property infrastructure, without supplying surveyed dwelling setbacks, precise cadastral boundaries, land tenure requirements, final road formation, proposed vegetation and fence removal, post-construction treatment or enforceable restoration arrangements. EnergyCo has also identified a potential alternative Camp 1 location, yet has not transparently demonstrated whether the associated Inglewood Road widening would remain necessary if that alternative is selected. This is NOT an isolated concern: across the full haulage and construction network, every householder, farmer and road user adjacent to proposed junction widening, turn lanes, access roads, lay-bys, culverts, drainage alterations and vegetation clearing must be able to understand exactly what is to be changed, for how long, whether it is to remain, and how access, safety, privacy, amenity and agricultural operations will be protected. The amended SEARs require a transparent project footprint and physical layout over time, road-upgrade concept designs, assessment of land and transport impacts,

measures addressing uncertainty and meaningful engagement with affected landowners; TfNSW specifically sought concept-level designs accounting for existing property accesses, safe sight distance, swept paths, drainage and geometric constraints. A label of "indicative disturbance" is not a substitute for an accountable, property-specific impact assessment. Material impacts must be identified, assessed and disclosed before determination, not discovered by residents after the project has been approved.

The problem is demonstrable in the strategic drawings themselves, and extends beyond the Inglewood Road residence. Technical Report 7 Appendix K, drawing IS_USC_05 for the New England Highway/Glenburnie Road intersection (PDF p. 389), marks an indicative disturbance footprint of approximately 33,900 m^2, approximately 6,500 m^2 and 4,100 m^2 of property acquisition required, and approximately 1,000 m^2 of vegetation/trees to be removed, alongside proposed changes to cattle grids, fences, gates and utilities. Appendix K drawing IS_WAC_07 for the Oxley Highway/Ruby Hills Road intersection (PDF p. 344) separately marks approximately 1,915 m^2 of property acquisition and works close to an existing memorial, with associated roadside infrastructure changes. These are proposed design quantities, not confirmed surveyed acquisitions or proof of ecological impact severity; they cannot automatically be added to the main EIS land-acquisition tables. However, their presence demonstrates that at least some drawing packages identify land-take while other Appendix H drawings use only the broader labels "Disturbance Footprint" and "Land Impacted (Indicative)". EnergyCo must provide a reconciled, drawing-by-drawing statement of which disturbance is temporary, permanently retained as pavement or drainage, acquired in fee simple, held by easement or licence, or restored, and which local residents, farm access routes and ecological values are affected. Section 46 addresses the associated acquisition and title issues without repeating this road-design criticism.

> REQUIRED ACTION BY ENERGYCO — SECTION 45

EnergyCo must distinguish permanent from temporary disturbance for EVERY road and intersection, disclose dwelling- and property-specific consequences including Inglewood Road, and provide affected landholders the plans and a meaningful opportunity to respond before determination. Reconcile Appendix H and K plans with the specific land-take and vegetation quantities annotated on IS_USC_05 and IS_WAC_07 and with the parcel acquisition register in Section 46.

Before determination, provide a complete GIS-referenced register and dimensioned, cadastral-overlay concept drawings for EVERY proposed road and intersection disturbance area, identifying (a) the exact road and intersection treatment and whether it is temporary or permanent; (b) existing road reserve boundaries, proposed works and any land access, licence or acquisition requirement; (c) surveyed distances to dwellings, driveways, buildings, fences and significant trees; (d) expected construction duration, vegetation clearing, drainage and noise/dust/vibration consequences; (e) the precise land and infrastructure to be restored, retained or maintained and who bears responsibility and cost; and (f) viable options to avoid or reduce impacts. Provide a specific property-impact and alternatives assessment for Inglewood Road and IS_MSC_06/IS_MSC_08, including the implications of the alternative Camp 1 site. Give directly affected landowners and relevant road authorities the draft drawings and a meaningful opportunity to comment BEFORE the affected works are accepted as resolved; respond individually and in writing to objections and identify amendments. If necessary details are not available, publish the resulting uncertainty and provide a supplementary assessment and consultation process before determination. Final designs, property agreements and rehabilitation obligations must be secured before any works commence. Cross-reference Sections 19 (intersection compliance), 26 (bridges and culverts), 33.1 (road safety and pre-approval consultation), 34 (rural property access), 41 (road disturbance and vegetation clearing) and 43 (conclusions).

46 | Unreconciled road-corridor property acquisition, temporary facility land take and compensation consequences

Evidence and EIS shortcomings

> References: Main EIS §§3.2.9.1–3.2.9.2 and Tables 3.4–3.5 (printed pp. 102–103), §§3.3.5 and 6.4 (pp. 110–112 and 212–213); Technical Report 7 Appendix K, IS_USC_05 (New England Highway/Glenburnie Road, PDF p. 389) and IS_WAC_07 (Oxley Highway/Ruby Hills Road, PDF p. 344), plus Appendix H; amended SEARs (7 April 2026), pp. 1–2, 4 and 6; TfNSW amended advice (11 February 2026), Attachment A, pp. 3–6; cross-reference Sections 35, 42 and 45.

There is a material gap between indicative road-upgrade disturbance drawings, the project-wide land-acquisition schedule and the information necessary to establish what individual landholders could permanently lose. Technical Report 7 Appendix K, drawing IS_USC_05, labels a roughly 33,900 m^2 disturbance footprint at the New England Highway/Glenburnie Road junction and separately indicates about 6,500 m^2 plus 4,100 m^2 of property acquisition, together with 1,000 m^2 of vegetation/tree removal and changes to existing gates, cattle grids, fences and utilities. Drawing IS_WAC_07, Oxley Highway/Ruby Hills Road, identifies about 1,915 m^2 of property acquisition and changes affecting roadside infrastructure and the vicinity of a memorial. These indicative drawing quantities are not confirmed titles, surveyed areas or completed acquisitions, but they raise straightforward questions that must be answered: which lots are involved; is each impact within the current road reserve or private land; what land is required permanently versus temporarily; and how will access, fencing, drainage, biosecurity, amenity and compensation be resolved? Sections 19 and 45 identify design and footprint problems; this section addresses the legal and agricultural consequences of the land requirement.

The main EIS itself confirms that land acquisition cannot be inferred from the disturbed surface area. Section 3.2.9.1 describes temporary construction easements and permanent transmission and operational access easements. Table 3.4 identifies approximately 1,199 ha proposed for acquisitions associated with permanent facilities, while Table 3.5 separately identifies approximately 1,455 ha of additional freehold acquisitions: Camp 1 (300 ha), Camp 2 (780 ha), an ancillary/laydown site on Timor Crawney Road (165 ha), and an ancillary/laydown site near Albano Road (210 ha). Individual Table 3.5 entries are marked “Full”, although the table footnote qualifies that multiple owners are involved and some interests are full and others partial; that qualification must be explained parcel by parcel. The workforce camps are described in §3.3.5 as temporary facilities to be removed following construction. A temporary use may still require purchase, but the justification for full freehold acquisition of large areas, future ownership, proposed disposal or reuse, and treatment of residual agricultural land should be examined against reasonably available lesser-impact tenure arrangements and alternative locations. The 1,199 ha and 1,455 ha tables describe different acquisition categories; neither should be assumed identical to the 3,579-ha construction footprint, and the Appendix K road acquisition quantities must not be added to them without proof of their treatment in the main schedule.

Without a consolidated, parcel-specific register, it is not possible for a landholder to check whether the published drawings reflect proposed negotiations or compulsory acquisition, whether roadworks cause loss of safe access or productive land outside the nominal acquired strip, or whether rehabilitation and restoration duties survive construction. This is particularly significant in light of the amended SEARs requirements for a coherent development footprint and physical layout over time, assessment of land, agriculture, transport and cumulative impacts, and evidence of consultation with affected landowners. EnergyCo should not rely on generic future acquisition negotiations as a substitute for disclosing foreseeable property impacts relevant to determining the project. Any final tenure arrangement remains subject to applicable law and individual rights; this submission asks for transparent and properly assessed proposals, not an unsupported legal declaration that acquisition is unlawful.

> REQUIRED ACTION BY ENERGYCO — SECTION 46

Before determination, publish a GIS-linked and cadastral parcel-by-parcel schedule of every property affected by permanent road widening, intersection works, construction access, operating access, camps or laydown facilities, including the affected lots, indicative areas, proposed interest (freehold acquisition, permanent easement, temporary construction easement, licence or existing road reserve), current and future use, whether works remain after construction, and rights of access and reinstatement. Reconcile each Appendix H/K map—including IS_USC_05 and IS_WAC_07—with main EIS Tables 3.4–3.5 and the construction/operational footprints without double counting. Identify acquisition responsibility, legal pathway, timing, proposed agreement/compensation processes, actual farming and residential consequences, alternatives to acquisition and future land ownership or disposal for temporary facilities. Supply directly affected landholders with dimensioned property plans and individual consultation records; independently review any material unresolved impacts and submit a supplementary EIS assessment and meaningful further engagement where necessary before project determination.

47 | Unresolved environmental and property impacts of pre-construction and enabling works before main management plans are approved

Evidence and EIS shortcomings

> References: Main EIS §§3.3.1 and 3.3.4 (printed pp. 104 and 108–110), §§3.3.5, 6.4 and 7.1.4–7.1.5 (pp. 110–112, 212–213, 225–226); Technical Report 7 §§6.7.1–6.7.2 and Table 4-2 (printed pp. 102–104 and 29); amended SEARs (7 April 2026), pp. 1–2, 3–4 and 6; TfNSW amended advice (11 February 2026), Attachment A, pp. 3–6; cross-reference Sections 34.1, 42, 45 and 46.

A further determination-stage concern arises from the main EIS, §3.3.1 (printed p. 104), which expressly proposes that certain pre-construction minor work and enabling work may commence following project determination but before approval of the construction management plans otherwise required by the project approval. The EIS indicates that mitigation controls would still apply; this is not a claim that EnergyCo proposes uncontrolled or automatically unlawful activities. Nevertheless, §3.3.4 (printed pp. 108–110) defines pre-construction minor work to include adjustments to property boundaries, gates, driveways, fences, stock infrastructure and utilities, maintenance of access tracks and some vegetation trimming or removal. Enabling work may extend to establishing workforce camps and construction ancillary areas, forming or upgrading access tracks, localised road widening, pavement strengthening, drainage and culvert adjustments. The EIS describes thresholds intended to avoid impacts requiring biodiversity offsets or specialist plans and proposes an Enabling Works Management Plan, but site locations, detailed classifications, review pathways and landholder-specific consequences are not consolidated in one publicly testable schedule.

The enabling-works traffic assumption also requires closer scrutiny. Technical Report 7, §6.5.1 (printed p. 91), identifies up to 200 workers, approximately 200 daily worker trips and 21 simultaneously active road-upgrade locations, before concluding that the resulting traffic can be accommodated on existing rural roads before upgrades are undertaken. This statement relies heavily on averaging journeys across geographically dispersed sites and does not demonstrate each affected road's capacity to accommodate heavy plant, materials deliveries, temporary traffic control or school and agricultural traffic at particular bottlenecks and seasonal conditions. EnergyCo should identify every pre-upgrade movement type, axle load, route and access point, explain the assumed distribution rather than rely solely on ten average movements per site, and undertake site-specific pavement, bridge, shoulder, flood, school and property-access screening before enabling activities begin. The requirement is not to bitumen-seal every rural road indiscriminately, but to

provide the necessary funded strengthening, drainage, safe passing or sealing where justified by verified engineering and community risk, before the corresponding loading and disruption occurs.

This deferral matters when read with the main EIS biodiversity assessment. Section 7.1.4 (printed p. 225) reports surveys over about 54% of the current project area, with precautionary methods for inaccessible land, and Table 7.1 (p. 226) includes a nominal four-metre centreline track in the full-clearing biodiversity footprint although wider access-track construction corridors are allowed elsewhere in the EIS. These facts do not show that every early-work location is unsurveyed or that the biodiversity methodology is necessarily deficient; rather, they make it essential to demonstrate where each early activity is proposed, what land has been surveyed, what vegetation and fauna habitats could be affected, the true working width and property access changes, and whether the work can in fact meet the stated "minor" or "low-impact" criteria. Independent checks are particularly important for watercourse crossing works, erosion-prone soils, karst-sensitive areas, significant trees, native vegetation, school bus corridors and land adjoining homes and farms. Transport for NSW advice also calls for distinct pre-construction traffic, sight-distance, swept-path and access assessments, and restricts the use of temporary traffic controls in specified pre-upgrade access scenarios. A broad statement that matters will be finalised later cannot replace evidence that the early activity is within its assessed scope and appropriately controlled.

The EIS also describes separate exempt investigation activities, subject to qualifying statutory conditions, that are excluded from this EIS and said to be managed through EnergyCo's own environmental review process (§3.3.1.1, printed pp. 104–105). Those separate activities should not be conflated with approved pre-construction and enabling works or treated as proof that all work is authorised by this infrastructure approval. The Department must be able to identify which early works depend on this approval, which are independently authorised, what assessment and notification applies, and which irreversible environmental or property outcomes are prohibited until the requisite investigations and approvals are complete. Given the short interval anticipated between approval and commencement, critical design, survey and landholder consultation information should be exhibited before determination where material to the decision, with clear pre-work hold points for remaining detail.

> REQUIRED ACTION BY ENERGYCO — SECTION 47

Before determination, provide a GIS-referenced early-works and enabling-works register with every proposed location, work description, legal approval pathway, responsible authority, extent and duration of ground disturbance, vegetation clearing and habitat survey status, drainage and watercourse impacts, existing and modified property access, land tenure, heavy-vehicle route and traffic controls, affected residents and required consultation. Publish objective criteria, supporting surveys and an independently verified decision process for classifying work as "minor" or "low impact"; identify which construction environmental and specialist management requirements apply from the outset and which must be satisfied before any particular works begin. Require enforceable no-go conditions and independent pre-work hold points where biodiversity, cultural heritage, karst, drainage, road safety or property interests could be materially affected, and complete necessary road safety and property-access measures before project-related vehicle movements begin. Distinguish exempt investigations managed under another statutory pathway from work authorised under this proposal, and provide a public change-control and complaints register. Any material unresolved locations or new disturbance must be assessed and opened to meaningful affected-landholder consultation before determination or before authorisation of that work, as appropriate. Reconcile Technical Report 7 §6.5.1 (printed p. 91) and its 200-worker/21-site assumption against actual early-phase heavy-plant movements, physical road capacity and local safety constraints, and apply enforceable no-haulage hold points until essential pre-upgrade protections are completed.

Conclusion

I ask the Department not to accept broad statements that traffic impacts are "manageable" without sufficient underlying evidence for the roads and residents most exposed to them. The risk is not evenly spread across a 305-kilometre project. It is concentrated at particular intersections, farm accesses, rural school bus routes and constrained road sections, including Thunderbolts Way and the connections serving Salisbury Plains and roads from Bayswater to Gundy.

The amended SEARs call for assessment of road condition, road safety, capacity, access, cumulative impacts, required upgrades and mitigation. Before determining SSI-74175972, the Department should require EnergyCo to demonstrate — with location-specific engineering evidence and accountable delivery arrangements — that foreseeable safety and property-access impacts will be prevented or reduced before construction traffic increases, not merely monitored after the fact. The Department should also require the parcel-specific land-take evidence and enabling-works safeguards identified in Sections 46–47 to be resolved to a level adequate for determination.

Please acknowledge this submission, place it on the public assessment record, and address the matters raised in the Department's assessment and requests for additional information.

Document references

NSW Department of Planning, Housing and Infrastructure, Amended Planning Secretary's Environmental Assessment Requirements, SSI-74175972, 7 April 2026, pp. 1–2, 4 and 6.

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Environmental Impact Statement, October 2026, §§3.3.5–3.3.6 and 14.3; Tables 3.6–3.7, pp. 110–115 and 559–562.

Aurecon for EnergyCo, Technical Report 7: Traffic and Transport Impact Assessment, Revision 0, 28 September 2026, especially §§2.3, 6.2.6, 6.3, 6.5, 6.4.2, 6.5.2–6.5.3, 6.5.7, 6.6.1, 6.6.3, 6.7, 8.4–8.10 and 9.1; Tables 6-3, 6-9, 6-11–6-12, 6-15–6-17, 8-5, 8-7, 9-1–9-3; Appendices F, G and J. In particular, §6.4 and Figures 6-4–6-6 (pp. 77–80), §6.7.4 (pp. 112–113), Appendix G (pp. 261–262) and Tables 9-2 and 9-3 (pp. 177, 181).

Site-specific road safety discrepancy (Section 34): Aurecon Technical Report 7 §§6.7.8–6.7.9 (printed pp. 124–127), Table 9-2 (printed p. 177), Appendix G (printed pp. 261–263) and Appendix K; main EIS §14.3.6 (p. 565) and TT17–TT23 (pp. 574–575); TfNSW amended advice of 11 February 2026, Attachments A and B; original 5 September 2026 Salisbury Plains community mitigation submission.

EnergyCo, Environmental Impact Statement, Chapter 16 (Noise and Vibration), §§16.1.1, 16.3.6 and 16.6; printed pp. 587–588, 612–613 and 625–628; and Chapter 13, mitigation measure AG3, printed pp. 541–542.

Transport for NSW, Amended SEARs advice (REN25/00205/001), 11 February 2026, Attachment A, pp. 2–8 (especially p. 2, non-high-risk OSOM and Special Purpose Vehicle descriptions), and Attachment B, pp. 9–10.

Uralla Shire Council, Uralla Local Transport Forum confirmed minutes, 5 August 2025, p. 4 (Rowan Avenue: recommended 15-tonne Gross Vehicle Mass restriction between Bridge Street and Duke Street). Status and installation of the restriction to be confirmed in writing with Council.

Uralla Shire Council, advice on Revised Scoping Report, SSI-74175972, 4 February 2026, pp. 1–2.

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Technical Report 6: Agriculture Impact Assessment, September 2026, especially §§5.4–5.6 (restricted agricultural movement, cropping, harvesting and livestock impacts).

EnergyCo, New England Renewable Energy Zone Network Infrastructure Project, Technical Report 4: Social Impact Assessment, September 2026, especially §§5.2.7.1–5.2.7.2 (noise, rural road traffic, safety and community disruption).

Aurecon for EnergyCo, Technical Report 7, Section 5.5.2 (printed p. 64; PDF p. 80), Appendix J, Table J-7 (PDF p. 374), identifying thirteen Uralla Shire school services listed under Edwards Coaches, including S331 (Thunderbolts Way) and S334 (Salisbury Road). Main EIS, Section 14.2.6 (printed p. 558), Section 14.3.7 (printed pp. 565–566), and mitigation measures TT17, TT18 and TT23 (printed pp. 574–575).

Aurecon for EnergyCo, Technical Report 7, Figures 6-17–6-19 (printed pp. 106–107); §§4.5.3–4.5.4 and 6.7.3 (printed pp. 33–34 and 105–109); Appendix A, Tables A-3–A-4 (printed pp. 189–190); Appendix B, Table B-1 (printed pp. 192–196); and Appendix F, Table F-2 (printed pp. 221–226). Compare amended SEARs, Transport (p. 4).

5 September 2026: Property-Specific Mitigation Measures — Thunderbolts Way, Salisbury Plains and Surrounding Affected Residents (copy of document supplied by affected residents; Exhibit A to separate Figure 6-17 discrepancy notice); 17 October 2026, EnergyCo_Thunderbolts_Way_EIS_Mitigation_Revised_Original_Email_17_Oct_2026.docx (cross-reference and correspondence timeline).

Whole-route intersection design discrepancies: Aurecon Technical Report 7, Table 9-2 (printed pp. 176–180), Appendix G (printed pp. 251–272), plus Appendices H and K; TfNSW advice REN25/00205/001 (11 February 2026), Attachment A, pp. 2–6; amended SEARs, Transport, p. 4. See full comparison table in Section 19.

Major ancillary, accommodation camp and energy hub access: Technical Report 7, Section 6.7.4, Table 6-19 (printed pp. 110–111), Section 6.7.2 (pp. 103–104), Table 6-16 (p. 96), Appendix G; EIS Tables 3.3, 3.6 and 14.3 (pp. 93, 114 and 562–563), Sections 3.3.5 and 6.10; amended SEARs p. 4; TfNSW amended advice of 11 February 2026, Attachment A, pp. 2–6.

Intersection mitigation categorisation and temporary controls: Aurecon Technical Report 7, §2.4 and Tables 2-2–2-3 (pp. 15–16), §6.7.2 (pp. 103–104), §6.7.4 (pp. 109–113), Appendix G; main EIS §14.3.2 (p. 561), TT17–TT19 and TT23 (pp. 574–575); amended SEARs Transport p. 4; TfNSW advice of 11 February 2026, Attachment A pp. 2–6. See Section 21 and its comparison table.

No-upgrade Uralla town-centre intersection findings: Aurecon Technical Report 7, §§6.6.1 and 6.7.4 (printed pp. 97 and 112–114), §8.7 (printed p. 159) and Appendix A (IS_USC_01/IS_USC_15); main EIS §§14.3.2, 14.3.6 and 14.6 (pp. 561, 565, 570–575); amended SEARs Transport p. 4; TfNSW advice of 11 February 2026, Attachment A pp. 2–6. See new Section 22.

OSOM road suitability on non-approved haulage routes: Aurecon Technical Report 7, §§6.4.2 and 6.7.5, Tables 6-9 and 6-21 and Figures 6-12/6-21 (printed pp. 81–89 and 114–120); main EIS §14.3.3 and TT5–TT8; amended SEARs, Transport (p. 4); TfNSW amended advice of 11 February 2026, Attachment B (pp. 9–10). See Section 23.

OSOM convoy passing opportunities, rural driveway access and agricultural stock movements: Technical Report 7, §6.7.5, Figure 6-23 and Table 6-22 (printed pp. 119–121); amended SEARs, Transport (p. 4); TfNSW amended advice of 11 February 2026, Attachment B (pp. 9–10); main EIS mitigation TT5, TT16–TT17, TT19 and TT23; community mitigation request of 5 September 2026. See Section 24.

OSOM page 120 summary, vehicle mass reconciliation and speed/timing assumptions: Technical Report 7, §6.5.7, Table 6-15 (printed p. 95), §6.7.5 Summary and Table 6-22 (printed pp. 119–120), Figure 6-23 (printed p. 121); main EIS §§3.3.6 and 14.3.3, Table 3.8 and TT5–TT8 and TT16–TT19; amended SEARs p. 4, Transport; TfNSW advice of 11 February 2026, Attachment B pp. 9–10; community mitigation submission, 5 September 2026.

Bridge, culvert and watercourse crossing structural suitability: Technical Report 7, §§4.5.7–4.5.8, 6.4.2 and 6.7.5 (including printed pp. 39, 87–88, 114–120), Tables 6-9, 6-21 and 6-22 and Appendices J/K (including

indicative Ruby Hills Road bridge-limit signage and drainage/culvert design drawings); main EIS §§3.3.6 and 14.3.3 and TT5–TT8; amended SEARs Transport p. 4; TfNSW amended advice of 11 February 2026, Attachment B pp. 9–10. See new Section 26.

Thunderbolts Way-specific road-condition and maintenance assessment: Technical Report 7, §§5.1.2, 6.7.7, 8.5.1, 9.1.5 and Table 9-3 (printed pp. 49, 123–124, 151, 167, 181–182); main EIS §14.3.5 (printed p. 564), mitigation TT7 (printed p. 572); amended SEARs, Transport (p. 4); Uralla Shire Council advice of 4 February 2026 (p. 2). See Section 31.

Southern construction-network road condition, structural capacity and maintenance: Technical Report 7, §6.7.7 (printed pp. 123–124), §§8.5.1–8.5.3 (printed pp. 151–154), §9.1.5 (printed p. 167) and Table 9-3 (printed pp. 181–182); main EIS §14.3.5 (printed p. 564) and Table 5.13 (printed p. 201); amended SEARs, Transport (p. 4).

Rural property access, agricultural continuity and documented landholder engagement (Section 35): Technical Report 7 §§6.7.4 and 6.7.13 (printed pp. 110 and 128–129); main EIS Table 14.4 (p. 566), LP2 (pp. 507–508), AG3 (pp. 541–543) and SO2 (pp. 408–409); amended SEARs Transport and Engagement (pp. 4 and 6); original 5 September 2026 mitigation request; 17 October 2026 formal mitigation review.

Emergency service access, rural evacuation and emergency response-time discrepancy (Section 36): Technical Report 7 §6.7.14 (printed p. 129); main EIS Table 14.4 (p. 566), TT1 (p. 570), TT16/TT21 (pp. 574–575), §17.3.4.3 (p. 664) and §24.2.2.12 (p. 803); Technical Report 4 §§5.2.7.2 and 5.2.8.2 (pp. 136–137, 144) and Appendix F (p. 47); amended SEARs pp. 4–5; TfNSW amended advice 11 February 2026, Attachment A pp. 3–4.

Operational traffic, lifetime road maintenance and rural-property access discrepancy (Section 37): Technical Report 7 §§7.1–7.8 (printed pp. 130–132), §9.1.5 (printed p. 167), Table 9-2 (printed p. 175), Appendix G (printed p. 257); main EIS §§3.4–3.5 (printed pp. 141–143), §14.4 (printed pp. 567–569) and Table 14.6; amended SEARs, Transport and Hazards (pp. 4–5); TfNSW amended advice dated 11 February 2026, Attachment A (pp. 2–6).

Cumulative Uralla–Salisbury Plains traffic impacts and five unlisted foreseeable projects (Section 38): Aurecon Technical Report 7, Chapter 8, §8.1, Table 8-1 (printed pp. 134–140), §8.3 and Table 8-2 (printed pp. 147–148), §§8.4–8.5.1 (printed pp. 148–152); main EIS Chapters 14 and 24; amended SEARs Transport (p. 4); TfNSW amended advice dated 11 February 2026 (Attachment A, pp. 2–4); NSW Cumulative Impact Assessment Guidelines for State Significant Projects (March 2026), §3.4 (pp. 16–17); Uralla Shire Council Parliamentary Inquiry submission received 6 February 2025; NSW planning records for Deeargee Solar SSD-70753725, Hillview Solar SSD-72447960, Hillview Wind SSD-78329994, Eastern Hub Firming Battery SSD-71860708 and Balala Wind SSD-143456490.

Cumulative OSOM trip generation, five unlisted future developments and apparent Kyoto arithmetic discrepancy (Section 38.1): Technical Report 7 §8.4, Tables 8-3–8-7 (printed pp. 148–151), §8.5.1 (p. 151); amended SEARs Transport (p. 4); Transport for NSW amended advice of 11 February 2026; NSW Planning Portal SSD-143456490, SSD-78329994, SSD-72447960, SSD-71860708 and SSD-70753725. The 1,495 figure is illustrative and conditional on both wind farms proceeding at proposed maximum turbine numbers.

Access tracks, agricultural disturbance and functional farm fragmentation (Section 42): main EIS §3.3.8 and Table 3.9 (pp. 125–126); §§6.4, 12.3.3, 12.4.3, 13.3.1, 13.4.1 and 13.5 (pp. 212–213, 496, 504, 530, 536, 539), agricultural measures AG1–AG4 (pp. 541–543); amended SEARs (7 April 2026), General Requirements (p. 2), Biodiversity/Water and Soils (pp. 2–3), Land/Transport (p. 4). Calculated corridor-area scenarios are illustrative, not EIS clearing estimates.

Additional environmental disturbance and field-survey reconciliation (Section 42): main EIS §§3.3.8, 6.4 and 7.1.4–7.1.5, Table 7.1 (printed pp. 125–126, 212–213 and 225–226); relevant BDAR / Technical Report 1 cross-

check to be provided; amended SEARs Biodiversity, Water and Soils and Transport (pp. 2–4). The 54% figure is survey coverage of the current project area, not a quantified area of unsurveyed roadworks.

Specific road-upgrade land-take, infrastructure and vegetation drawings (Sections 45–46): Technical Report 7 Appendix K IS_USC_05, New England Highway/Glenburnie Road (PDF p. 389; indicative 33,900 m^2 disturbance, 6,500 m^2 and 4,100 m^2 property acquisition, 1,000 m^2 tree/vegetation removal), and IS_WAC_07, Oxley Highway/Ruby Hills Road (PDF p. 344; indicative 1,915 m^2 property acquisition). Figures are annotated proposal quantities requiring surveyed confirmation, not completed acquisitions.

Freehold and easement acquisition and temporary construction facilities (Section 46): main EIS §3.2.9.1–3.2.9.2, Tables 3.4–3.5 (printed pp. 102–103), and §3.3.5 (pp. 110–112); amended SEARs General, Land, Transport and Engagement (pp. 1–2, 4 and 6); TfNSW amended advice 11 February 2026, Attachment A pp. 3–6. Distinguish permanent-asset acquisitions (1,199 ha), additional acquisitions (1,455 ha) and road-specific drawings to avoid double-counting.

Pre-construction / enabling work before main plan approval (Section 47): main EIS §§3.3.1–3.3.1.1, 3.3.4–3.3.5 (pp. 104–105 and 108–112), §7.1.4–7.1.5 (pp. 225–226); Technical Report 7 §6.7.1–6.7.2 (pp. 102–104), Table 4-2 (p. 29); TfNSW amended advice Attachment A (pp. 3–6). Separate statutory exempt investigations and pre-construction minor / enabling work are not interchangeable categories.

Additional Tamworth corridor, Moonbi–Bendemeer and rural school/seasonal road-use evidence (Sections 3, 5–7, 17, 23 and 33): Technical Report 7 §§4.5.3, 6.4.2, 6.7.3, 6.7.5, 6.7.12–6.7.13, 8.5.2; Tables 6-7 and 6-8 (printed pp. 85–87), Appendix K transformer VTP sketches RS_TRC_21, RS_TRC_23 and RS_TRC_25; EnergyCo Tamworth Port-to-REZ OSOM Route Development Report (September 2026), and EnergyCo's Port-to-REZ Tamworth consultation closing 28 October 2026; Community transport observations, 1 November 2026 (community evidence requiring site verification).

Additional camp, spoil, water and wastewater traffic sources (Sections 9, 10, 12, 14 and 42): Technical Report 7 §§6.5.3–6.5.6 and Tables 6-12–6-17 (printed pp. 92–96); main EIS §§3.3.3.2, 3.3.5, 3.3.13.1/Table 3.11 (printed pp. 107, 110–112, 137–138), Chapter 23 construction waste and wastewater measures (including relevant table); Technical Report 7 §§6.7.3 and 8.5.2 (printed pp. 105–109 and 153–154). Water demand is not equivalent to a wholly trucked volume.

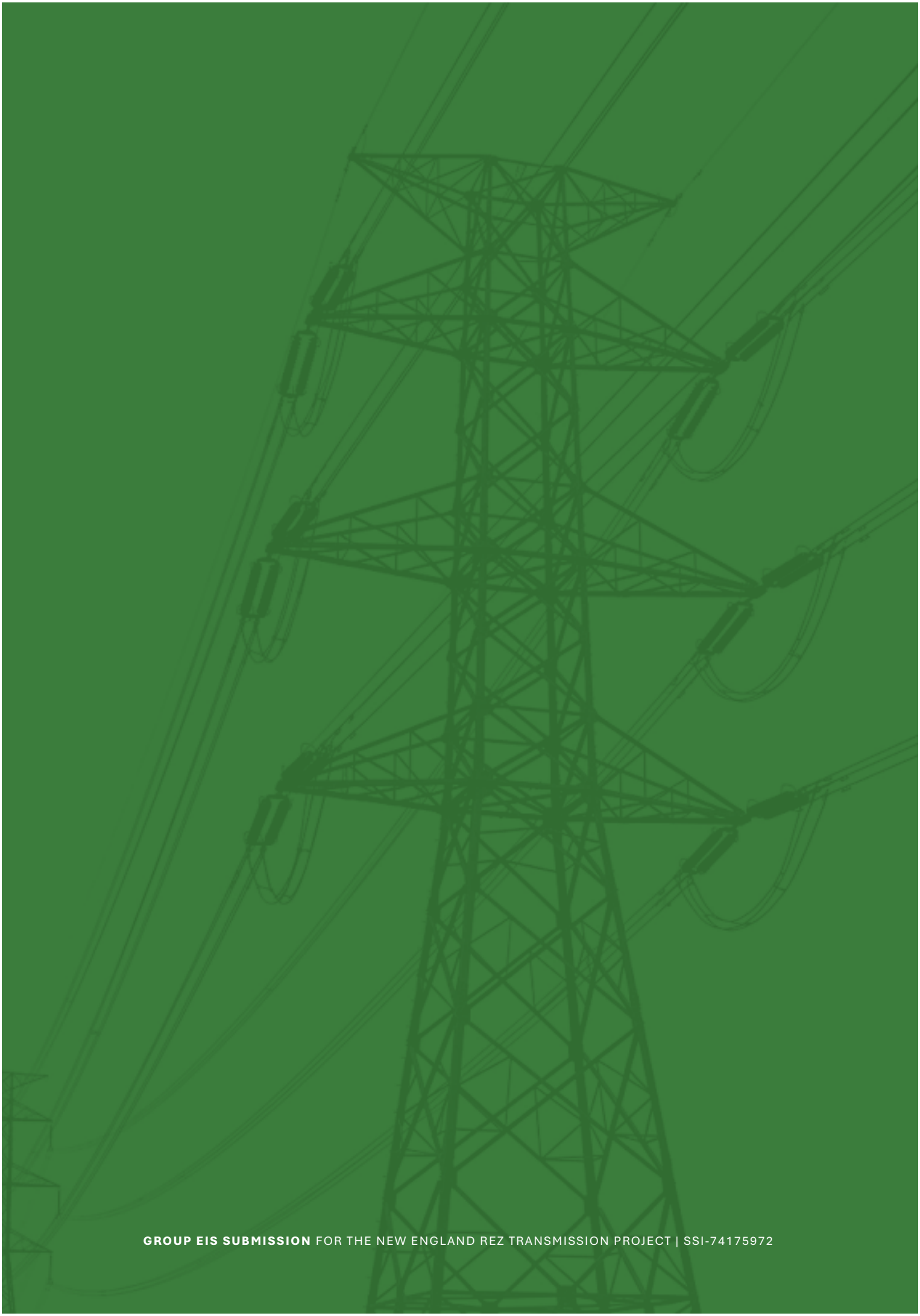
Additional cumulative-project screening (Section 38): Wala Wala (Dungowan Valley) Pumped Hydro, NSW Major Projects Portal, SSD-138320740 (Prepare EIS), https://www.planningportal.nsw.gov.au/major-projects/projects/wala-wala-dungowan-valley-pumped-hydro; Australian Government EPBC public referral 2026/10620 (potential early-2029 construction and indicative connection/road arrangements), https://epbcpublicportal.environment.gov.au/all-referrals/project-referral-summary/?id=5ae3f214-509c-f111-b8dc-6045bdc4aff7. Indicative dates/roads remain subject to approval and detailed design.

Port Stephens Cutting project status and route-disruption screening (Section 38): Tamworth Regional Council, Port Stephens Cutting Upgrade, Council 2024–25 Delivery/Annual Plan (approximately five kilometres of Nowendoc Road and 12–18 month then-anticipated works) and draft 2026–27 Operational Plan and Budget (funding allocation). Council's early-works REF is a distinct, historical assessment and does not confirm the timing, extent or duration of any 2028–29 full closure. Current staging and detours must be verified with Council.

SECTION **15**

Cultural Heritage

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 15

Cultural Heritage

Key issues we have found ...



More than half remains unsurveyed

More than half the project area remains unsurveyed, and most potential archaeological deposits lack testing needed to understand proposed impacts.



Low sensitivity areas contain heritage

Almost half of newly recorded sites were found in areas classed as low sensitivity, undermining proposals to exclude some surveys.



Physical safeguards are too limited

Physical barriers apply only near the disturbance footprint, leaving more distant sites dependent on maps and internal procedures for protection.



Cultural assessment cannot be deferred

Further surveys, Songline assessments and protection rules are deferred, leaving the public without essential information when preparing submissions on impacts.



Dunghutti consultation must be meaningful

The public record does not demonstrate meaningful Dunghutti participation; consultation must occur locally, with sufficient information, time and agreed arrangements.



Keep recovered objects on Country

Recovered objects are assigned to temporary storage outside the region, while permanent custody remains undecided and local care requires guarantees.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >



> Image shows one of many mature trees within the proposed construction corridor, Racecourse Paddock

SECTION **14**

Cultural Heritage

SCOPE OF THIS CHAPTER

The Aboriginal Cultural Heritage Assessment (ACHA) for the project is not complete enough to support a decision. On EnergyCo's own figures, 54% of the project area has not been surveyed, and 76% of known PADs have not been test excavated. Further work is deferred to documents the public will not get to comment on.

This chapter looks only at procedural and technical adequacy: whether the assessment meets its own stated requirements, and whether its proposed protections are enough. It makes no comment on the cultural significance of any site, place or value. That is for Traditional Owners, knowledge holders and Registered Aboriginal Parties (RAPs) to speak to.

Unless noted otherwise, all figures are taken from EnergyCo's Technical Report 2, Aboriginal Cultural Heritage Assessment (Umwelt and OzArk, Final, September 2026, Report 22962/R03), and Appendix F of the EIS (Summary of Management and Mitigation Measures).

1 | What the assessment was required to do

The SEARs require an assessment of impacts to Aboriginal heritage, "cultural and archaeological", "including test excavations". It must follow the Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in NSW (OEH 2011) and the Code of Practice for Archaeological Investigation of Aboriginal Objects in NSW (DECCW 2010) (ACHA Table 1.1, p.12).

Agency advice on the SEARs set a high bar (ACHA Table 1.2, pp.13 to 15):

- Heritage NSW asked for targeted test excavation, done in consultation with RAPs and with its written endorsement.
- The National Indigenous Australians Agency (NIAA) asked for identification of "all Aboriginal cultural heritage values within and adjacent to the revised corridor and hub locations", with disturbance "only where avoidance is demonstrably not feasible".

It is hard to see how avoidance can be demonstrated for sites that have not yet been found. The sections below test the ACHA against these requirements.

1.1 The survey and test excavation are incomplete

The ACHA states that "approximately 46% of the project area" was surveyed, because of land access restrictions (Executive Summary p.iv; Section 11.1, p.279). In the remaining 54%, impacts are assessed by "desktop assessment and predictive modelling" only.

Test excavation, which the SEARs specifically require, is thinner still:

- Project area surveyed: about 46% (5,032 of 10,928 ha) (s11.1, p.279; Table 11.6)
- Upper Hunter properties tested, of those planned: 1 of 19, over three days (s8.1.2, p.217)
- New England Tablelands properties tested, of those planned: 7 of 9 (s8.1.2, p.217)
- Total area excavated across the program: 53 square metres (s8.1.2, p.218)
- PADs in the project area not yet test excavated: 62 (76%) (s11.4.1, p.292)
- Upper Hunter artefacts recovered from testing: 19, from two areas (Executive Summary p.iii)

The ACHA also notes that some test locations are now outside the project area because of later alignment changes (s8.1.2). Without testing, the significance of 62 PADs and 7 possible culturally modified trees cannot be assessed (Executive Summary p.iv).

RAPs raised this directly. The ACHA records that "some RAPs noted that approximately half of the total project area has been surveyed and asked how the limited coverage would be addressed" (Table 2.7). The answer was that survey will be completed in stages as land access becomes available.

1.2 The known impacts are large, and the model predicts as many again

Even with less than half the project area surveyed, 180 known Aboriginal sites and PADs could be directly impacted. Only 38 are protected by "no-impact" areas (ACHA Table 11.4, pp.290 to 291; EIS Table 8.6, p.322). The ACHA calls this a conservative worst case, but no other figure is put forward for assessment.

The ACHA's own predictive model expects about the same number again in the unsurveyed 54% (Table 11.7, p.296):

- High or moderate sensitivity areas: about 78 sites and about 81 PADs
- Low sensitivity areas: about 53 sites and about 6 PADs
- Total: about 131 sites and about 87 PADs

That is about 218 further sites and PADs whose location, nature and significance are unknown. The public and the consent authority are being asked to accept impacts that have not been identified.

Two technical problems weaken confidence in these predictions:

- The text contradicts the table. Section 11.4.3 (p.295) says unsurveyed areas contain "slightly less" moderate and high sensitivity land ("1,642 ha compared to 1,788 ha in surveyed areas"), so fewer sites are expected. The ACHA's own Table 11.6 shows the reverse: surveyed areas hold 1,642 ha (426 high plus 1,216 moderate) and unsurveyed areas 1,788 ha (340 plus 1,448). The predicted counts in Table 11.7 are higher, consistent with the table, not the text. The narrative understates the unsurveyed risk.
- Nearly half of new sites were found in "low" sensitivity areas. In the survey, 115 of 238 newly recorded sites (48%) were in areas the model mapped as low sensitivity (Table 9.1, p.260). Yet the future survey strategy prioritises moderate and high areas (AH13), and says areas of low sensitivity due to disturbance "will not require survey" (s12.3.2, p.318). On the ACHA's own results, this risks missing a large share of sites.

1.3 The real assessment is deferred past public exhibition

The ACHA says the outcomes of further survey and testing "will be provided as part of the Submissions Report and Amendment Report and, if required, following this process" (s11.1, p.279). These will be in an "addendum ACHA". Section 12.3.1 (p.317) goes further:

> *"given that the progression of these works require additional land access and that timing is uncertain, the general principle is that any commitments not achieved prior to project approval will be addressed post-approval under the provisions of an ACHMP."*

The public is being asked to comment on an assessment the proponent itself expects to replace. The addendum ACHA will not be publicly exhibited in the same way. Anything not finished before approval moves into a management plan prepared after approval, outside public scrutiny.

The same pattern applies to intangible values. The two Anaiwan Songlines that cross the project area, and culturally significant ecological values, are to be assessed later in the addendum ACHA or the ACHMP (AH16, AH17).

This is not limited to heritage. The EIS says further ecological survey will be done before the Submissions Report, "which will include a revised BDAR" (EIS s7.9, p.295). Two workforce camp sites, Camp 3 near Barry and Camp 1 Alternate, were identified after the ACHA and "neither of these alternatives were considered in the ACHA" (EIS s8.2.7, p.315). Camp 3 has areas of high archaeological sensitivity beside the Barnard River and was only checked by desktop review and a site inspection. Both are to be fully assessed in the Submissions Report and Amendment Report (EIS p.316).

1.4 Without an AHIP, the ACHMP carries all the weight

The NPW Act makes it an offence to harm Aboriginal objects without an Aboriginal Heritage Impact Permit (AHIP) under section 90. Because the project is State Significant Infrastructure, section 5.23 of the EP&A Act removes that requirement (EIS Appendix D; ACHA Table 1.3). The ACHA confirms no AHIP is needed "during investigations for the EIS phase or post project approval".

The site-by-site scrutiny of an AHIP is replaced by conditions of approval and an Aboriginal Cultural Heritage Management Plan (ACHMP) that does not yet exist. Its key contents are left to be worked out later, including:

- criteria for when a PAD needs salvage, and when "unmitigated impact" is acceptable (AH7, AH12)
- buffers, materials and monitoring for protected sites (AH3)
- which sites get archaeological monitoring (AH3)

When the permit regime does not apply, the assessment before approval must be complete and the conditions must be specific. Here neither is the case. Most known sites have not been assessed for significance, half the area has not been surveyed, and the management rules are still to be written.

1.5 The 20 m threshold for physical protection is too narrow

Only avoided sites within 20 m of the final disturbance footprint get physical barriers (AH3). Sites more than 20 m away get "distance-based avoidance", which means they "do not require fencing, signage or active land-management measures" and rely on mapping and "related controls" for project personnel (AH4; ACHA s12.2.3.5, p.312). Where fencing is installed, the buffer is a "nominal 5 m" from the site boundary (AH3).

On a 300 km construction project with heavy machinery, access tracks and stockpiles, 20 m is a small margin. The ACHA itself assesses vibration risk from blasting to 66 m from the project boundary (s11.4.4, p.296). The ACHA gives no technical justification for the 20 m figure.

The Central-West Orana REZ shows what happens when protection depends on internal procedures. In 2026 an Aboriginal rock shelter that had been identified in that project's planning approval was "damaged beyond recovery" during access track construction. ACEREZ, the network operator, said the processes required to protect it "were not fully implemented", and its internal investigation found failures in site design and onsite construction protocols. The Department of Planning, Housing and Infrastructure began an investigation (ESD News, 27 May 2026; ESD News, 24 June 2026).

That was a single known site on a comparable EnergyCo REZ transmission project. The New England project has 38 avoided sites now, with more expected, plus around 218 predicted sites and PADs not yet found.

1.6 Test excavation depends on the approval timetable

Mitigation measure AH14 (EIS p.338; Appendix F p.32) states:

> *"Further archaeological test excavation will aim to be undertaken to inform the Submissions Report and Amendment Report in an addendum ACHA. The scope of testing during this period will be dependent on land access availability and timing considerations for project approval."*

The scope of a required assessment step should be set by what is needed to understand the impacts, not by the project's approval schedule. AH14 also only "aims" to test, and directs testing for management purposes only to areas within, or being considered for, the disturbance footprint. Read with s12.3.1, any testing not done in time moves to the post-approval ACHMP. The Upper Hunter, where only 1 of 19 planned properties was tested, is the region most exposed to this.

1.7 Consultation with Dunghutti people and Amaroo Local Aboriginal Land Council has not been adequate

The Walcha section of the project, from the energy hub near Walcha south through Niangala towards Nowendoc, crosses Dunghutti Country within the area of Amaroo Local Aboriginal Land Council (LALC). This section does not speak to the cultural significance of any place. That is for the Dunghutti community to speak to.

What EnergyCo's documents record

The public EIS documents show that Amaroo LALC was registered and invited. They do not show that it took part.

- Amaroo LALC registered as a Registered Aboriginal Party on 11 January 2024, with its contact listed only as "CEO/Chairperson" (ACHA Table 2.1, entry 47).

- Amaroo LALC is listed among the organisations "invited" to 7 of the 22 survey weeks between August 2024 and March 2026. The table notes that "not all organisations had participants present on every working day" (ACHA Appendix D, Table 1.1). The ACHA does not record which days, if any, Amaroo representatives attended.
- Amaroo LALC is not listed among the attendees at either round of Aboriginal Focus Group meetings, held in May 2024 and June 2026 (ACHA Tables 2.2 and 2.6). Both rounds were held only in Armidale, Tamworth and Muswellbrook. None was held in Walcha.
- No comments from Amaroo LALC are recorded on the assessment methodology or on the draft ACHA (ACHA Tables 2.3, 2.5 and 2.7).
- Amaroo LALC is not listed among the participants in test excavation (ACHA Appendix D, Table 2.1).
- No interviewee in the cultural mapping work is identified as representing Amaroo LALC or the Dunghutti community (ACHA Table 7.1).
- The consultation records that would show what contact actually occurred (ACHA Appendix B) have been withheld from the public version of the report.

The main EIS nonetheless states that "all LALCs intersected by the project area have been consulted for the project" (EIS s12.2, p.483). On the public record, that statement cannot be tested for Amaroo LALC.

The EIS also records land claimed by or on behalf of Amaroo LALC within the project area (EIS s12.2, p.483). Any contact with the LALC about compensation for that land is a property matter. It is not consultation on cultural heritage, and should not be counted as such.

The section from the Central South Hub near Walcha to Muswellbrook was redrawn on 2 October 2025, and registration was reopened from November to December 2025 (ACHA s2.2 and s2.3.1). Much of the Dunghutti Country south of Walcha was therefore only added to the assessment in this later round of consultation.

Concerns raised in the local Aboriginal community

- There are places of cultural significance in the Walcha section of the line, between the hub near Walcha and Niangala and Nowendoc. The community wants support to work through the EIS and confirm that these places will not be disturbed.
- The release of the EIS and the submission period were not clearly communicated to the Walcha Aboriginal community.
- We understand EnergyCo has offered information sessions for Aboriginal communities in Armidale and Tamworth on 10 and 11 November 2026, immediately before submissions close. Sessions at that point, held outside Walcha, leave no time for the community to understand the EIS and respond.
- Aboriginal objects recovered during earlier renewable energy assessments in the region were taken to Dubbo, and the community is still working to have them returned locally. There is concern the same will happen here.

What the documents show on these concerns

- The name Dunghutti does not appear anywhere in the ACHA or the EIS. The reports use "Dainggatti (Thunggutti)", drawn from published language maps (ACHA Executive Summary and s2.3.1). The community has asked that the correct name, Dunghutti, be used.
- Under this project, recovered artefacts are stored temporarily outside the region. New England artefacts go to Umwelt's office at Teralba, near Newcastle. Upper Hunter and Tamworth/Liverpool Ranges artefacts go to OzArk's office in Dubbo (ACHA Appendix L, s2.4.2; mitigation measure AH10). Long-term care is not decided, and is left to the ACHMP after approval (AH11). The community's concern is therefore well founded for this project as well.

Taken together, the public record does not show that the Dunghutti community or Amaroo LALC has been meaningfully consulted on the impact of the project on Dunghutti Country. This falls short of the SEARs requirement for "evidence of adequate consultation with Aboriginal parties in determining and assessing impacts" (ACHA Table 1.1). It also falls short of the NIAA's advice that First Nations stakeholders be given "sufficient time and information" (ACHA Table 1.2).

2 | What we ask the Department to do

1. Not determine the project until survey and test excavation are complete for the whole disturbance footprint, including Camp 3 and Camp 1 Alternate.
2. Require the addendum ACHA to be publicly exhibited, with a formal submission period, before any determination.
3. Require EnergyCo to correct the contradiction between the s11.4.3 text and Tables 11.6 and 11.7, and restate the predicted impacts in the unsurveyed area.
4. Require survey of low sensitivity areas within the disturbance footprint, given that 48% of newly recorded sites were found in such areas.
5. Remove "timing considerations for project approval" from AH14, so the scope of testing is set by assessment need alone.
6. Require EnergyCo to justify the 20 m threshold in AH3 and AH4, and increase it so that all avoided sites near works are physically protected and monitored.
7. Make the ACHMP subject to Heritage NSW approval before any ground disturbance, with clear, enforceable conditions of approval for salvage criteria, buffers and independent monitoring.
8. Require EnergyCo to explain what has changed since the Central-West Orana rock shelter loss to stop the same failure here.
9. Grant Amaroo LALC, and any Dunghutti knowledge holders or groups who request it, an extension of time to make a submission on the EIS.
10. Require EnergyCo to undertake genuine, direct consultation with the Amaroo LALC board and Dunghutti knowledge holders, held in Walcha and at times they agree to, before the Submissions Report is lodged. This should cover places of cultural significance in the Walcha section, the survey and test excavation program, and management measures. Its outcomes should be reported in the addendum ACHA.
11. Require the ACHA and the ACHMP to use the name Dunghutti, as requested by the community.
12. Require, as a condition of approval, that Aboriginal objects recovered from Dunghutti Country are held locally, in a place agreed with the Dunghutti community, and are not moved out of the region, including during temporary storage.

References

EnergyCo (2026), New England REZ Network Infrastructure Project Environmental Impact Statement, SSI-74175972: Sections 7.9 and 8; Appendix D (Statutory compliance table); Appendix F (Summary of management and mitigation measures).

Umwelt and OzArk (2026), Technical Report 2: Aboriginal Cultural Heritage Assessment, Final, September 2026, Report 22962/R03.

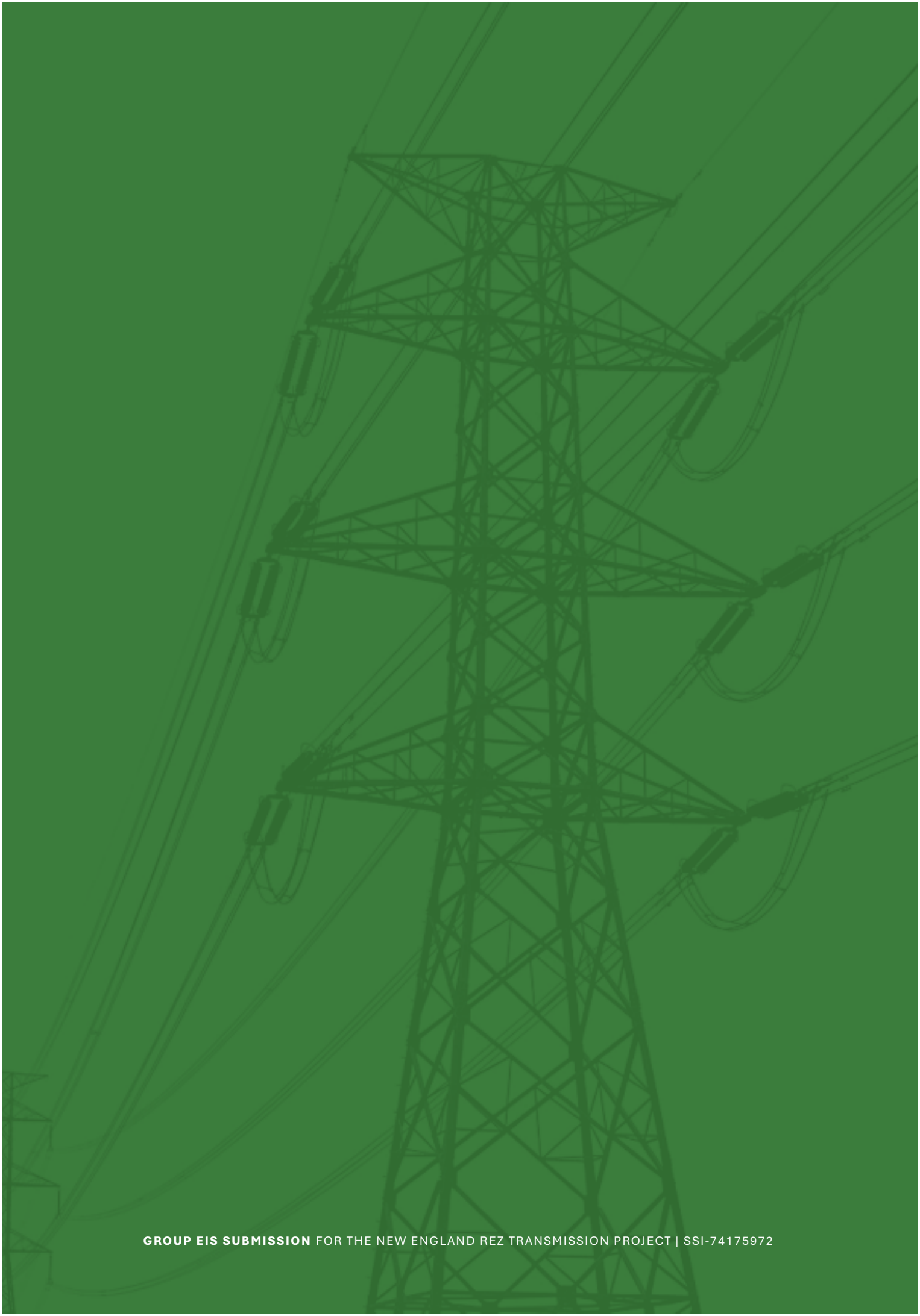
ESD News (27 May 2026), REZ consortium destroys Aboriginal heritage rock shelter. https://esdnews.com.au/rez-consortium-destroys-aboriginal-heritage-rock-shelter/

ESD News (24 June 2026), ACEREZ says internal 'failures' led to rock shelter destruction. https://esdnews.com.au/acerez-says-internal-failures-led-to-rock-shelter-destruction/

SECTION **16**

Economic Impact on Regional Industries

WALCHA HIGH COUNTRY GUARDIANS | Rouchel Brook ACTION GROUP | PROTECT THE VALLEY UPPER HUNTER RESPONSIBLE INFRASTRUCTURE GROUP | Voice for Walcha



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SECTION 16

Economic Impact on Regional Industries

Key issues we have found ...

Tourism losses are not quantified	The EIS does not establish how access disruption, landscape change and construction pressures affect visitor spending, bookings or business viability.
Visitor accommodation needs protection	Room totals do not establish vacancies; workforce demand during events, seasonal peaks and camp delays could displace tourists from accommodation.
Visitor routes and destinations matter	Scenic roads, attractions, events and farm stays need combined assessment of delays, noise, dust and visual changes affecting visitor experiences.
Local employers face labour competition	Construction recruitment can draw staff from hospitality, retail, freight and essential services, yet consequences for individual towns remain insufficiently assessed.
Council services face resource pressure	Councils need assessment of staffing risks, contractor availability and rising materials costs, with funding commitments to protect maintenance and services.
Existing businesses need secure supplies	Combined demand for drivers, machinery, trades, quarry products and concrete could disrupt forestry, freight, housing construction and ordinary regional business.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >



> The Open Air Gallery in Walcha is a drawcard for tourists to the area

SECTION **16**

Economic Impact on Regional Industries

EXECUTIVE SUMMARY

The project passes through communities whose tourism economies depend on rural scenery, reliable visitor access, accommodation, events, outdoor recreation and agricultural experiences. The EIS recognises tourists, scenic routes and visitor accommodation in individual technical studies. However, it does not demonstrate an integrated assessment of the consequences for materially exposed tourism businesses and destinations between Bayswater, the Upper Hunter, Tamworth, Walcha, Uralla and Armidale.

The project will create substantial demand for labour, accommodation, transport, construction materials and local services. Technical Report 8 acknowledges that cumulative construction demand may draw workers from other sectors, raise wages and prices, and cause shortages of goods and services. The central question is whether existing regional industries and essential services can continue to operate during construction. Tourism is one important component of this wider economic assessment. [7]

Tourism and the visitor economy

1. The EIS has not demonstrated a corridor-wide, locality-based assessment of exposed tourism businesses, visitor attractions and agritourism operations.
2. Regional economic modelling does not separately establish the consequences for tourism bookings, visitor spending and business viability.
3. Short-stay accommodation pressure is recognised, but critical protective arrangements for seasonal tourism, events and workforce demand are deferred.
4. Traffic and visual assessments identify relevant routes and receptors without consistently establishing the implications for visitor journeys and tourism operations.
5. The combined effects of access, amenity, accommodation demand and other infrastructure projects on tourism destinations are not adequately brought together.

Other regional industries and essential services

6. Labour competition and wage pressures acknowledged in the economic report have not been translated into town-level risks for existing employers and essential services.
7. The costs to councils and consequences for freight, forestry, hospitality, retail, trades and other businesses have not been assessed in sufficient industry-specific detail.
8. Cumulative demand for workers, materials, plant and transport has not been reconciled with ordinary regional needs and available supply.

The community groups seek further assessment and specific mitigation commitments before determination, rather than deferral of fundamental matters to post-approval plans.

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> Figure 1 - **Apsley Falls Walcha**

2 | SEARs and Assessment Requirements

The amended SEARs do not expressly require a separate tourism chapter. They do require assessment of likely economic, social and environmental impacts, existing conditions, uncertainty, cumulative effects, community views and mitigation proportionate to the significance of impacts. Tourism must therefore be examined across the relevant technical studies. [1]

2.1 Applicable assessment requirements

1. **General requirements:** identify tourism activities and localities exposed to likely social, economic and environmental effects, and assess their significance and uncertainty.
2. **Traffic and transport**: assess traffic generation, access, cumulative impacts and mitigation, including relevant visitor routes and events.
3. **Landscape and visual**: assess impacts on relevant scenic roads, visitor destinations and accommodation.
4. **Social impacts and workforce accommodation**: assess livelihoods, amenity, housing and accommodation pressures affecting tourism communities.
5. **Economic and workforce matters:** establish local economic consequences and how workforce management will minimise impacts.
6. **Engagement**: demonstrate relevant consultation, responses to concerns and mitigation.
7. **Appendix A cross-references the SEARs to the EIS.** The adequacy test is whether the cited studies substantively answer the requirements, not whether a reference appears in the table. [2]

2.2 Council advice

Tamworth Regional Council requested assessment of cumulative workforce effects on visitor accommodation and its major-events economy, together with an Accommodation and Employment Strategy in the EIS addressing visitor-economy displacement. Armidale Regional Council requested a comprehensive Workforce Accommodation and Employment Strategy with the EIS, rather than after approval, and opposed workforce use of tourist and visitor accommodation. Uralla Shire Council requested analysis of relative local impacts and capacity, including smaller settlements rather than reliance on broad regional averages. The EIS should show how each material concern has been resolved. [3–5]

The same assessment requirements must also be tested against the labour availability, business continuity, supply-chain and council service-delivery risks identified in Part B. Regional economic activity does not, by itself, establish that existing industries and essential services can continue operating. [7]

3 | Assessment of Economic Impacts

Part A
Tourism and the visitor economy



> Figure 2 - **Glenbawn Dam provides a significant input into the economy, through tourism**

3.1.1 Coverage of tourism communities and businesses

The Social Impact Assessment profiles Muswellbrook, Upper Hunter/Scone, Tamworth, Walcha, Uralla and Armidale and addresses smaller localities. This establishes geographic recognition but does not, by itself, establish which tourism businesses and visitor destinations are exposed to the project or the consequences for them. [6]

The assessment should identify exposed accommodation, farm stays, agritourism operations, attractions, scenic routes, recreation sites and events, then connect their location and operations to project impacts. Relevant areas for examination include the Bayswater–Upper Hunter visitor economy and Lake Glenbawn access; Nundle and Hanging Rock tourism and events; Walcha and its surrounding scenic routes including the Oxley Highway, Thunderbolts Way and Niangala Road; Uralla, Kentucky and Gostwyck heritage and farm tourism; and Armidale and northern accommodation and visitor destinations. These are areas for assessment, that should have all impacts assessed.

Regional averages can conceal concentrated impacts in small settlements and on individual businesses dependent on a particular route, landscape or visitor activity.

3.1.2 Economic consequences and agritourism

Technical Report 8 models project economic activity across broad regions. Its input-output results do not incorporate local price changes and contraction in other sectors; those effects are discussed qualitatively. It does not separately establish displaced visitor bookings, tourism spending losses or individual tourism business viability. Agricultural production-loss estimates do not separately identify farm-tourism income. [7]

Construction spending cannot be treated as evidence that the existing visitor economy will remain viable. Workers occupying accommodation do not necessarily replace visitors who spend on tours, attractions, events and other local businesses. Farms may also depend on tours, tastings, accommodation and visitor experiences beyond their agricultural production.

The greatest impact might be from visitors being unable to find available accommodation, and the region losing its identity as a tourism destination. This has flow on impacts in future tourism seasons.

EnergyCo should identify materially exposed tourism and agritourism businesses and assess the plausible consequences for bookings, visitor demand, income, operating costs and business viability, with uncertainties disclosed.

3.1.3 Workforce accommodation and visitor displacement

Technical Report 4 assumes 40 workers establishing each camp over six months. Its Table 5.3 compares this demand with short-stay room stock: Camp 1, 23.5% of 170 rooms; Camp 2, 71.4% of 56 rooms; Camp 3, 31.4% of 127 rooms; Camp 4, 2.6% of 1,563 rooms; and Camp 5, 4.7% of 851 rooms. These are shares of total stock, not evidence of vacant rooms when workers need them. [6]

Camp 4 pools Tamworth, Walcha, Uralla and Armidale; Camp 5 pools Walcha, Uralla and Armidale. Those catchments do not reveal the actual pressure on Walcha or other individual towns, particularly during events, seasonal peaks, overlapping construction and delays in camp opening.

Appendix F measure SO4 defers accommodation-use arrangements, enabling-work demand, major events, seasonal tourism and cumulative pressure to a Workforce Management Plan during detailed design/construction. Technical Report 8 nevertheless concludes that the camps make cumulative accommodation impacts unlikely. These findings require reconciliation. [7, 8]

A town-by-town and month-by-month assessment should establish workforce demand against realistically available rooms and identify enforceable measures to prevent material visitor displacement before determination.

3.1.4 Scenic routes, landscape and visitor experience

Technical Report 5 identifies tourist accommodation, private recreation areas and Tourist Drives 19 and 21. At viewpoint PVP-07 on Niangala Road, the report identifies a moderate visual impact and recognises multiple open views along the road, for which continuous screening would be impractical or inappropriate. [9]

A technical visual rating does not necessarily establish what the change means for accommodation bookings, scenic journeys, outdoor visitor activities or the attraction of a destination. Viewpoints should represent actual visitor-use areas and repeated views along routes, not only isolated static views. Where easement-affected private receivers are excluded under the visual assessment framework, any tourism consequences should be addressed in the social or economic assessment.

3.1.5 Visitor access, construction traffic and events

Technical Report 7 recognises tourist routes and recreational cycling and proposes liaison on cycling events and future controls. Its property-access discussion is principally directed to residential access and temporary restrictions. The practical consequences for tour schedules, visitor arrivals, coaches, caravans, events and passing trade are not demonstrated together. [10]

Acceptable intersection performance does not establish reliable visitor access. EnergyCo should specify expected delays, closures, detours and restrictions by location and construction period, including enabling works and road upgrades, and explain protections for visitor routes and events.

3.1.6 Noise, dust and tourism amenity

The EIS assesses noise, vibration and amenity through technical chapters. The contributor's review raises a specific verification question: whether the receptor locations represent visitor cabins, campsites, outdoor dining, farm-tour areas and other outdoor activities, rather than only residences. [11]

EnergyCo should cross-check tourism properties and visitor-use areas against the relevant receptor maps, predictions and construction timing. This is an identified assessment question, not a verified claim that all such properties were omitted.

3.1.7 Combined and cumulative effects

Tourism businesses may experience road disruption, visual change, noise, dust and accommodation pressure at the same time. Individual technical assessments do not necessarily explain the combined consequences for a business or destination. Relevant overlapping projects and the experience of visitors travelling through several affected localities should also be examined. [6, 9, 10]

The EIS should identify materially exposed destinations, assess their combined effects during construction and operation, and explain the significance of projects excluded from cumulative scenarios or construction assumptions not yet resolved.

3.1.8 Tourism-specific engagement

Section 5 and Appendix E summarise community engagement. The contributor's review does not establish which tourism operators and tourism organisations were consulted, what issues they raised and how these changed the project assessment or mitigation. [11]

A locality-based account of tourism-sector engagement and responses is required. General community engagement alone does not demonstrate that business-specific operational impacts were identified.

Part B
Workforce, regional industries and essential services

3.2.1 Labour availability and business continuity

Technical Report 8 expressly recognises that cumulative construction demand can attract workers from other sectors, cause shortages of goods and services, and increase wages and prices. However, the report does not demonstrate the resulting recruitment, wage and operating risks for existing employers in individual towns. Regional economic activity estimates cannot show whether a café can open, a freight operator can retain drivers or a council can maintain services. [7, executive summary and §7.2.8]

EnergyCo should quantify labour demand by occupation, locality and construction phase, distinguish genuinely additional workers from those recruited away from existing employers, and assess the capacity of businesses and essential services to continue operating.

3.2.2 Council services and finances

Councils compete for engineers, road crews, mechanics, plant operators, planners, administrators and contractors. Project recruitment and demand for equipment, road materials and contractors may raise costs or delay ordinary maintenance and capital works. The EIS does not demonstrate a council-by-council

assessment of vacancies, recruitment risks, cost escalation or service continuity. These consequences require assessment, not an assumption that every council will experience losses.

EnergyCo should consult affected councils on vacancies, wage and contractor costs, works programs and statutory service obligations, and identify funding and mitigation for material additional costs.

3.2.3 Hospitality, retail and other local employers

Pubs, cafés, restaurants, accommodation operators, supermarkets, fuel outlets, trades, repairers and small service businesses may gain customers but lose staff to higher-paid construction work. Increased turnover is not necessarily increased profit where businesses cannot recruit, must pay higher wages or lose established customers. The economic report does not establish net outcomes for these sectors in small communities. [7]

The assessment should test labour availability, operating costs, supplier reliability and business viability by locality, with particular attention to small employers and seasonal peaks.

3.2.4 Transport and freight

Construction demand for heavy vehicle drivers, haulage, mechanics, vehicles and road access may compete with ordinary freight, passenger transport and local deliveries. The transport assessment addresses road impacts but does not demonstrate the economic consequences of cumulative demand, delay and access restrictions for existing operators. [10]

EnergyCo should identify peak demand for drivers, haulage and plant and assess overlap with established freight movements, servicing and delivery commitments.

3.2.5 Forestry and timber businesses

Technical Report 8 identifies 100.4 hectares of native production forest and 62.6 hectares of plantation forest affected in the New England region, and describes the regional economic activity effect as negligible relative to construction. That comparison does not establish impacts on individual forestry contractors, timber haulage, machinery availability, harvesting schedules or business continuity. [7]

This section addresses forestry employment, supply chains and commercial operations; direct forest land-use and management effects are addressed in Section 7.

3.2.6 Trades, construction materials and other regional works

Technical Report 8 recognises that excess demand for quarry materials and concrete may increase prices and cause shortages for other uses. The December 2025 New England REZ Local Supply Chain Study identifies approvals and water constraints affecting the expansion of concrete and road aggregate supply. These pressures may affect council works, housing construction, maintenance contractors and other local customers. [7; 13]

EnergyCo should reconcile project demand for aggregate, concrete, plant and skilled trades with verified supply capacity and ordinary regional demand, identifying potential price and availability consequences.

3.2.7 Health, care, education and essential services

Health providers, aged care, childcare, schools and community organisations depend on available workers and affordable housing. Even where they do not recruit construction trades, accommodation and cost pressures may affect retention and recruitment. The EIS should screen essential employers for material workforce and housing exposure; this is a risk requiring assessment, not a verified finding of staff losses.

3.2.8 Local procurement benefits versus displacement

Technical Report 8 proposes Local Workforce Development, Local Industry Participation and Australian Industry Participation plans, and council and chamber consultation (EC1 and EC2). These may create

opportunities but do not demonstrate who receives benefits and who bears higher wages, staff losses or supply costs. The economic assessment should distinguish gross project expenditure from net outcomes for existing regional businesses. [7, §8, Table 8.1]

3.2.9 Cumulative demand and construction timing

The EIS acknowledges that overlapping major projects can cause labour shortages, wage increases and pressure on construction inputs. It does not demonstrate how quickly the small labour and supply markets of affected towns can adjust. A credible assessment must align enabling works, road works, camp establishment, transmission construction and concurrent projects on a common timeline, and test delayed camps and peak demand. [7; EIS Chapter 24 §24.2.2.8]

4 | Summary of Deficiencies

4.1 Tourism and the visitor economy

1. The EIS has not demonstrated a locality-based register and assessment of tourism exposure across the affected communities.
2. Economic modelling does not establish material tourism business and agritourism consequences.
3. Accommodation analysis uses total room stock and defers important arrangements for protecting visitors.
4. Visual and transport findings are not consistently translated into consequences for visitor activities and business operations.
5. Combined tourism impacts and relevant overlapping projects are not adequately assessed at destination level.
6. Tourism-specific consultation, responses and enforceable protections remain insufficiently demonstrated.

4.2 Regional industries and essential services

9. Labour competition and wage pressures acknowledged in the economic report have not been translated into town-level risks for existing employers and essential services.
10. The costs to councils and consequences for freight, forestry, hospitality, retail, trades and other businesses have not been assessed in sufficient industry-specific detail.
11. Cumulative demand for workers, materials, plant and transport has not been reconciled with ordinary regional needs and available supply.

These deficiencies leave affected communities unable to evaluate the consequences for tourism income, visitor access and destination appeal before the project is determined. Essential impact assessment and protective commitments should not be left to future management plans.

The broader deficiencies also leave existing employers and councils unable to assess the risks to staff retention, operating costs, supply reliability and service delivery. The assessment must establish the consequences for existing regional industries, not simply the scale of project expenditure.

> POSITION SOUGHT

The community groups request that the Department require EnergyCo to address the following matters before determination:

Tourism-specific requirements

- Provide a corridor-wide, locality-based register and screening assessment of exposed tourism businesses, attractions, accommodation, agritourism operations, scenic routes and events.
- Assess material business and destination effects, including visitor demand, bookings, expenditure, access, operating costs and viability where relevant.
- Identify and assess tourism income streams in mixed agricultural and visitor businesses.
- Provide a town-by-town, month-by-month accommodation assessment covering enabling works, camp establishment and delays, events, seasonal demand and other projects, using realistic room availability.
- Reconcile the social and economic accommodation conclusions and establish enforceable protections against material visitor displacement.
- Assess practical road delays, closures, detours and event conflicts on tourism routes, with defined access protections.
- Verify that tourism premises and outdoor visitor-use areas are represented appropriately in visual, noise, dust and amenity assessments.
- Assess combined and cumulative effects on materially exposed tourism destinations and explain excluded projects and uncertainties.
- Document tourism-operator and tourism-organisation consultation, issues raised, responses and any resulting changes.
- Set measurable mitigation, monitoring and intervention triggers for material tourism impacts, with key commitments assessed before approval.

Regional industry and service-continuity requirements

- Provide a town-by-town economic baseline and workforce vacancy assessment for existing non-agricultural industries and essential services.
- Quantify project recruitment by occupation and phase, including likely recruitment from existing employers and associated wage, retention and service-continuity risks.
- Assess council staffing, contractor availability, road maintenance, materials costs and service-delivery capacity, and establish who will fund additional costs.
- Assess industry-specific business continuity for hospitality, retail, transport, forestry, trades, health and care services, and other materially exposed employers.
- Reconcile project demand for drivers, plant, quarry materials, concrete and trades with existing regional demand and verified supply capacity.
- Assess overlapping projects and delayed workforce accommodation under plausible peak-demand scenarios; establish measurable mitigation and intervention thresholds.

Until these matters are addressed, the EIS does not provide a sufficient basis to conclude that the project's effects on the tourism sector, other regional industries and essential services have been adequately identified, assessed and mitigated.

Key References

[1] Amended SEARs, SSI-74175972, pp.2–6.

[2] EIS Appendix A, Table A.1, SEARs compliance table.

[3] Tamworth Regional Council amended advice, §§3.2 and 3.5, pp.4–5.

[4] Armidale Regional Council amended advice, p.7.

[5] Uralla Shire Council amended advice, pp.1–2.

[6] Technical Report 4, Social Impact Assessment, §5.2.8.1, Table 5.3, p.142, and community baseline.

[7] Technical Report 8, Economic Impact Assessment, executive summary; §§2.1–2.4, 4.3, 5.4, 7.2.3 and 7.2.8; §8 and Table 8.1.

[8] EIS Appendix F, mitigation measure SO4, pp.45–47.

[9] Technical Report 5, Landscape and Visual Impact Assessment, §§5.8.3, 9.4.1, Tables 37 and 46.

[10] Technical Report 7, Traffic and Transport Impact Assessment, §§5.1.2 and 6.7.11–6.7.13.

[11] Corinne Annetts, Section 16 – Tourism – Draft 01, tables 1–4 (contributor review).

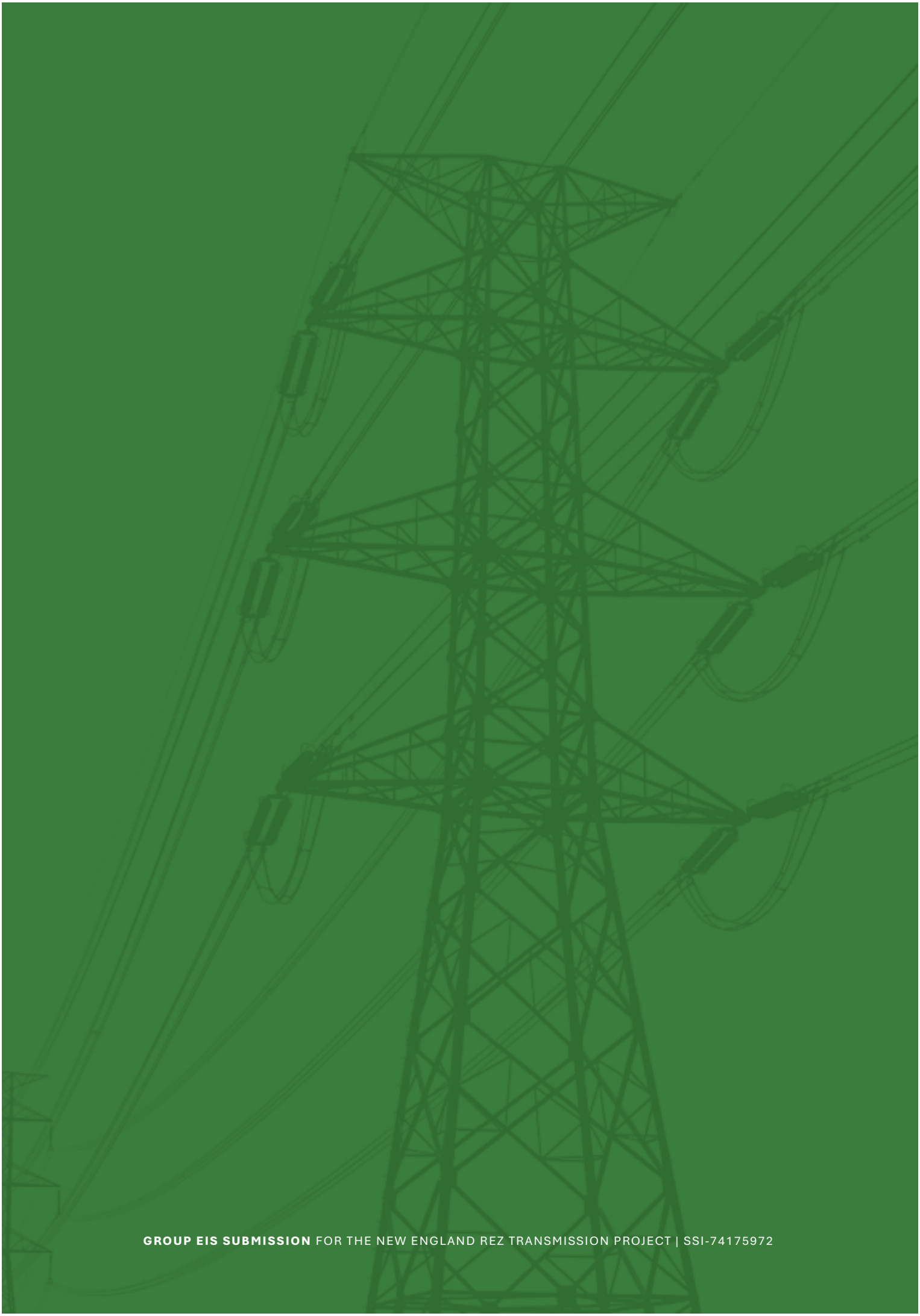
[12] EIS Chapter 24, §24.2.2.8, cumulative economic impacts.

[13] New England REZ Local Supply Chain Study, December 2025, constraints on aggregates, concrete, plant and transport.

SECTION 17

Social and Community Impacts

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 17

Social and Community Impacts

Key issues we have found ...

Current corridor communities remain misrepresented	Evidence from the previous corridor and limited participation by directly affected landholders cannot reliably represent communities along the current route.
Negative impacts are often downplayed, while positive ones overstated	Light touch mitigations somehow lead to a significant reduction in risk. These mitigations generally reference future planning materials yet to be developed.
Assessment downplays survey respondents' opposition	The 2026 online survey records 53% rejection, yet summary language suggests conditional acceptance and diminishes respondents' opposition to the project.
Camps threaten essential community resources	Most engagement preceded camp disclosure, leaving safety, traffic, water and service pressures inadequately assessed with communities facing substantial workforce influx.
Community vulnerability ratings are unreliable	Conflicting population figures, missing locality ratings and unexplained scoring obscure which communities lack the services and capacity to absorb disruption.
Small towns face compounding pressures	Overlapping projects would concentrate workforces in smaller towns, adding pressure on housing, health care, roads, community facilities and social cohesion.
Wellbeing protections must precede approval	Stress and anxiety ratings are reduced using unwritten strategies; require funded, tested protections, independent review and community scrutiny before approval.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >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SECTION **17**

Social and Community Impacts

EXECUTIVE SUMMARY

EnergyCo's Social Impact Assessment is fundamentally unreliable and should not be accepted as a basis for approving the New England REZ transmission project. It misrepresents affected communities, understates opposition and claims reductions in social harm that depend on measures still left for future development.

EnergyCo has used evidence gathered from landholders and communities along the previous corridor to draw conclusions about people affected by the new route. The report itself acknowledges that alignment changes prevent some survey responses from being merged or directly compared, yet combines them in its account of community values.

Publishing those conclusions despite that acknowledgement is a serious misrepresentation. It is unprofessional and insulting to the landholders and neighbours now facing the project, whose circumstances and concerns cannot be represented by surveying people elsewhere. EnergyCo changed the corridor; it was responsible for assessing the people it brought into the project's path.

The assessment describes community attitudes as "conditional acceptance" while recording 53% rejection in the 2026 online survey. That language downplays the opposition in its own evidence. Inconsistent population figures, unexplained vulnerability ratings and poor representation of directly affected landholders further undermine its findings. Communities should not have to correct a government proponent's misrepresentation of their views and circumstances.

Much of this report comprises subjective risk analysis, exposing bias and misrepresenting community risks.

Consultation before disclosure of camp locations and scale cannot establish informed community views about those camps. Workforce camps and construction pressures threaten housing, water supplies, health care, emergency services, roads and social cohesion. The assessment does not demonstrate how smaller communities will withstand these pressures alongside other developments. It then reduces risk ratings by relying on future management plans without showing that the measures will work. Promised consultation and unproven mitigation provide no demonstrated protection for the communities carrying these risks.

The assessment must be redone, independently reviewed and publicly exhibited before any approval is considered. EnergyCo must survey the communities on the current corridor, disclose the full project scope, correct its baselines and assess local and cumulative impacts with the responsible service agencies. Mitigation must specify funded actions, accountable parties, deadlines and enforceable performance standards. Affected communities must be able to scrutinise the evidence and challenge the conclusions before determination.

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1 | Potential SEARS issues to be investigated

The Secretary's Environmental Assessment Requirements (SEARs), as amended and issued on 7 April 2026 (as per Technical Report 4 (TR4)), set out what the EIS must do. On the evidence below, the social impact material does not appear to meet the following requirements:

- SEARs require an assessment of social impacts "in accordance with" the Social Impact Assessment Guideline. The assessment does not appear to show this where baseline data is incorrect (Objection 9), the evidence base is incomplete or pre-dates the current corridor (Objection 2 and 3), and residual ratings are not supported by the evidence based and justifiable mitigation actions described (Objection 7).
- SEARs require the EIS to assess the state of the existing environment and the community's views. The baseline errors highlighted in Objection 9, and the reliance on pre-route alignment survey data, do not appear to give a reliable account of the current corridor.
- SEARs require the mitigation measures to avoid or minimise impacts, and a consolidated summary of proposed mitigation measures to be provided. However, management plans central to the mitigation responses are deferred until after approval - meaning that the EIS fails to describe the specific mitigation actions necessary to reduce consequential impacts.
- SEARs require the EIS to detail how engagement was consistent with the Undertaking Engagement Guide for State Significant Projects (DPIE, November 2021). Community groups report that they were not consulted in preparing the assessment and Technical Report 4 acknowledges trust issues.

  > *See Appendix 1 which outlines community groups halting engagement due to their loss of trust in processes. These groups confirm they were not directly contacted by the authors of the social impact assessment to try and engage in the surveys. EnergyCo and Minister Sharpe were aware of these concerns and the breakdown of communication and did not address or rectify the issues highlighted.*
- SEARs require consideration of the need for construction workforce accommodation. Camp 3 at Barry has no vulnerability, access or remoteness rating (Objection 9), suggesting that the assessment of its social impact is incomplete. As per Objection 1, the camps are also presented as a mitigation measure to population influx issues and are not assessed for the potential impacts they impose.
- SEARs require cumulative impacts to be considered with existing and proposed developments in the region. The Central-West Orana REZ experience (Parliamentary Inquiry Report 65) suggests cumulative and compounding effects. There is no mention of specific plans for how cumulative impacts with this project are going to be mitigated/ managed.
- SEARs require the EIS to cover community views. This has not been adequately achieved as per below.

2 | Technical Report Objections

We request that the following objections be addressed and questions be answered appropriately within the EIS Technical Report 4: Social Impact Assessment prior to approval.

Objection 1

The EIS Social Impact Assessment SEARS requirement *"An assessment of the social impacts in accordance with Social Impact Assessment Guideline and consideration of the need for construction workforce accommodation"* has not been sufficiently met as the social evaluation and assessment of the camps has not taken place.

> Evidence

- The vast majority of community engagement activities took place prior to the announcement of the camps' locations and size - effectively silencing community feedback in relation to the potential impacts of the camps themselves and significantly misrepresenting community engagement data that was collected before the project scale was understood in full.
- The authors have deliberately positioned the workforce camps as a mitigation measure to population influx risks and limited housing but have failed to consider the impacts of the camps themselves on affected communities, neighbouring landholders as well as local resources.

Incoming construction workforce	Service centres Hub/workforce accommodation camp locations	Broader community Users of affordable /community/ crisis housing	C/3 = Medium	• Inclusion of workforce accommodation camps to reduce the demand on local accommodation • Implementation of the Workforce Management Plan that identifies expectations associated with the use of short-term and rental accommodation by contractors

Source: Umwelt, Social Impact Assessment, page 186.

> Why it matters

- While the camps are a mitigation tool to reducing pressure on local housing, the population size of these camps is significant as outlined in Technical Report 4, especially in proportion to communities in proximity. This poses significant safety concerns for neighbouring families, increases vehicle movements and traffic congestion and strains local resources.
- The camps represent a significant increase in the scale of infrastructure needed to complete the project, building temporary housing and living facilities for a workforce of hundreds of people. Assessing the suitability of sites, access to critical shared resources including water, and ensuring that the appropriate checks and balances are in place is needed.
- Community participation in the design, implementation and decision making of the workforce camps is needed to reduce risks and highlight potentially unforeseen risks.

Objection 2

The survey data used to inform the Social Impact Assessment has not been consistently targeted to affected communities - as surveys were conducted prior to the announcement of the line assessed within the EIS. This is likely to have misrepresented affected community concerns and influenced the risk analysis component of Technical Report 4.

> Evidence

- Data from a previous study corridor is utilised throughout the social impact assessment, misrepresenting community sentiment, perceptions, concerns and feedback. The social impact assessment and EIS were prepared while the transmission route was still changing. Technical Report 4 records the first round of engagement (February–March 2025) and the first online survey (April–July 2025) as taking place before the newly announced 3-km study area (October 2025) and the 1-km corridor (1 May 2026).
- Technical Report 4 states that the 2025 survey responses reflected the project area as proposed at that time, and that some questions and responses across the 2025 and 2026 online surveys "cannot be merged or directly compared" because of the alignment change.

  Despite this, Technical Report 4 does not identify which baseline data, community views, quotes, ratings or conclusions rest on the first-route investigations throughout their report, so a reader cannot tell which parts of the assessment describe the current route and which related to the previous route and corresponding social impacts
- The social impact assessment presents findings from both surveys (and the CATI) as a unified summary of "community values" (e.g., Figure 4.1, 2026: 85). If the datasets cannot be compared, the social impact assessment cannot use them jointly to demonstrate trends, consistency, or the nature and extent of community attitudes.

> Why it matters

- The corridor change was announced in October 2025 and it impacted over 100 new properties. (Proposed New England REZ corridor shift sparks landholder talks | The Northern Daily Leader | Tamworth, NSW). The newly affected landholders feedback and concerns have not been captured in the survey data presented in Technical Report 4.
- The feedback from previously affected communities, including Dungowan, is currently being used in measuring community perceptions and detailing potential impacts, whereas newly affected areas including Barry, Timor, Waverly and Niangala have not been able to participate in the survey process
- Social, cultural and community impacts depend on place: who lives on or near the line, how they use the land, and what it means to them. Data gathered for a different route describes different people, landscapes and communities. Using findings from a previous corridor provides an inaccurate picture of the likelihood and magnitude of impacts, making the ratings built from this data unreliable. This poses significant risk to the affected communities and landholders and misrepresents the social, cultural and community impacts of the current route.

Objection 3

The survey data used to inform the Social Impact Assessment has been collected prior to the full scope of the proposed project being announced – likely misrepresenting affected communities' perceptions of the proposed project and the scale of the cumulative impacts presented.

> Evidence

- Technical Report 4 records the first round of engagement (February–March 2025) and the first online survey (April–July 2025). With the new route only announced in October 2025 and the hubs and camp locations only announced as recently as August 2026, it is clear that the community perception data and feedback driving the social impact assessment outcomes was collated prior to the announcement of the project scale in its entirety.

> Why it matters

- Any data collected prior to the change of route (i.e. the 2025 surveys) cannot be used to infer the newly affected communities' current beliefs as their exposure to the project materially changed (they were unaffected by the prior alignment). It is highly likely that the views of the affected communities towards the project shifted with the change of route – essentially rendering all previous data obsolete.
- Any data collected prior to the announcement of the camp size and locations does not capture the community sentiment, concerns or feedback in relation to the camps and the size of the proposed workforce and is not an accurate reflection of the community perception to the project description in full.
- Communities cannot fairly participate in the process of design and development if they are not provided with the information that affects their way of life, cost of living, livelihoods and sense of community and place. Information collected prior to several key developments in the project scope is likely to misrepresent affected communities' feedback.
- The data collected from the community surveys is being used to identify potential impacts and determine mitigating actions. Community feedback and their shared lived experience is needed to best determine potential risks and cumulative impacts of the project. Without this knowledge and feedback, the potential for consequential negative impacts is heightened.

Objection 4

Risk analysis framework and processes are subjective, lacking transparency, community participation and independent oversight.

> Evidence

- The risk analysis matrix outlined in the Technical Report 4 is a basic risk matrix not suitable for this level of analysis and the scale of project proposed.

Table 2.7 Social Impact Significance Matrix

LIKELIHOOD LEVEL	1 MINIMAL	2 MINOR	3 MODERATE	4 MAJOR	5 TRANSFORMATIONAL
A Almost certain	Low	Medium	High	Very high	Very high
B Likely	Low	Medium	High	High	Very high
C Possible	Low	Low	Medium	High	High
D Unlikely	Negligible	Low	Low	Medium	High
E Very unlikely	Negligible	Negligible	Low	Medium	Medium

- Clear examples of subjective weighting of likelihood and severity of impact exist throughout the social impact assessment matrix. For example this is shown in table 6.1, where "improved access roads" for affected landholders appears to be an inflated assessment of medium potential benefits. Especially when comparing the same medium level negative ratings assigned to disruption to agricultural operations, loss of property values and relocation of landholders."
- Technical Report 4 does not provide a detailed methodology in how pre-mitigation risks and residual risks were determined. The methodology only states that "Proposed design changes, mitigation and management measures are considered in relation to how they may reduce the significance of negative social impacts, with strategies also noted that may enhance positive impacts of the project and deliver positive community outcomes and social value." (page 30)
- There is no evidence of engaging third party specialists to review the risk analysis outcomes or taking steps to validate the results with affected communities and landholders.

> Why it matters

- The lack of information about the methodology and scoring of impacts both positive and negative speaks to significant transparency issues and increases the risk of unintended blindspots, underestimation of actual impacts, devaluing of genuine community concerns and subjective results.
- Without a detailed and qualitative description of the scoring system, it is highly likely that risks have been undervalued and overinflated depending on the authors' opinion – rather than a defined and justifiable decision tree that can be explained to stakeholders in a transparent and accountable manner.
- By not undertaking a validation exercise, the social impact assessment limits itself to the opinions of the authors based on secondary data sets and community perception survey results. This closed decision-making process is highly likely to lead to miscalculated risks and misunderstood mitigations – placing affected communities and landholders at greater risk of consequential negative impacts.
- Risk Analysis requires descriptive definitions that outline what would be severe impacts, medium level impacts or low-level impacts as well as the frequency for highly likely, likely, possible, seldom. Without smart definitions that can be reviewed more objectively – there is no transparency in the outcomes of the assessment and affected communities and landholders are limited in their ability to review the project on its merits and challenge issues where necessary.

Objection 5

Soft or light touch mitigation actions are over-inflated in their ability to remedy high risk impacts that have been identified by communities. Highlighting inconsistent and subjective risk analysis throughout Technical Report 4.

> Evidence

- There is a common trend throughout the social impact assessment to significantly exaggerate the effectiveness of mitigation measures in alleviating negative risks caused by the project. As an example (but not limited to), increased stress and anxiety is classified as A/4 "Almost certain with major impacts", yet low impact, low reach mitigation measures including (1) the continuation of existing mental health services; (2) a Community Wellbeing Strategy; and (3) updating the EnergyCo Engagement Strategy (not yet defined), increased stress and anxiety is downgraded to "moderate and possible" residual risk.

> Why it matters

- The transmission lines are planned to traverse through several small towns and areas, often placing large workforce populations on small centres, straining health services, community services, education services, emergency responders. Long term structural economic barriers already exist in ensuring that small towns can access basic services including healthcare, with many small towns in NSW already experiencing a decline in service accessibility. Only committing to provide telehealth services and first aid kits inside the workforce camps is not sufficient in ensuring that local healthcare facilities can function as normal and that the community is not disrupted in accessing services. This also poses risks to the workforce itself and raises questions of duty of care.
- Mitigation measures need to the tangible, measurable and accountable to the risk profile that they aim to remedy. Mitigation measures that remain undefined and make considerable assumptions as to their ability to deliver only increase the risk of project success and unfairly place affected communities and landholders at greater risk.
- If the project proponent only plans to implement soft or light mitigation measures during the planning stage there is significant risk for unforeseen consequences and impacts that will need to be rectified in real-time, while placing added pressure on services, housing and local resources. These contingency measures would be un-costed and unplanned, leading to delays in the project cost blowouts and placing the affected communities in a vulnerable position.

Objection 6

Mitigation measures primarily propose future planning tools to be developed without any guarantees of community participation in planning, development, implementation or decision-making.

> Evidence

- Technical Report 4 sets out mitigation and management measures at a high level (for example, "develop", "implement" and "consult"), but the detail sits in plans to be prepared after approval (i.e none of these plans exist at this point in time: the Social Impact Management Plan and Community Wellbeing Strategy (SO1), Community and Stakeholder Engagement Plan (SO2), Local Industry Participation Plan (SO3), Workforce Management Plan (SO4), and the property management, biosecurity, soil and water, noise and vibration, traffic and emergency response plans. The Community Environmental Benefit Plan is "not yet determined" (p. 124).
- The monitoring framework (Table 7.2) has no targets, thresholds or corrective actions, and Technical Report 4 does not say who will review the results or whether they will be published.

> Why it matters

- Future planning tools are not tangible risk management actions that affected landholders and communities can review – highlighting transparency, accountability and trust issues.
- Local knowledge and affected community engagement can enhance planning, minimise risks and increase community buy-in and ownership.
- Without mandating plans to be part of the exhibited EIS, the community has no formal opportunity to read, comment on or challenge plans that affect their livelihoods, way of life, sense of place and community.
- The experience in the Central-West Orana REZ (Inquiry Report 65) is that commitments of this kind did not deliver the benefits promised. Without ending this practice now, there is a high risk of repeated consequential negative impacts on affected communities.
- Technical Report 4 acknowledges (p. 98) that community trust in the proponent is an issue, yet the mitigation depends on the proponent's goodwill and voluntary commitments which many community members say they do not trust. The experience of the Central-West Orana REZ is the best available test of whether such mitigation works. The NSW Legislative Council Portfolio Committee No. 4 – Regional NSW (Report 65, July 2026) found that commitments made at assessment stage were not experienced as benefits by communities. This is the same approach, by the same proponent, to the same type of project.

Objection 7

The residual ratings have been predetermined throughout the Social Assessment when the vast majority of mitigation measures listed have not been developed, designed or planned – lacking all consequential detail needed to determine if the residual risk has been reduced.

> Evidence

- Residual ratings have been developed in the Social Assessment Matrix provided in both the EIS and Social Impact Assessment. These ratings rely on plans that do not yet exist, have not been tested or consulted.
- The Social Impact Management Plan (SO1, with the Community Wellbeing Strategy), Community and Stakeholder Engagement Plan (SO2), Local Industry Participation Plan (SO3) and Workforce Management Plan (SO4) are all examples of plans to be written after approval, as are the property management, biosecurity, soil and water, noise and vibration, traffic and emergency response plans. The Community Environmental Benefit Plan (CEBP) is described as "not yet determined" (p. 124), yet benefit sharing is relied on to offset impacts.
- The monitoring framework (Table 7.2) lists indicators but no targets, thresholds or triggers for corrective action, so there is no way to know if mitigation is working or what happens if it is not.

> Why it matters

- As it currently stands the authors of the report have essentially assigned a lower risk rating to potential impacts without any detailed planning and design to justify the risk allocation. It is the equivalent of drawing a conclusion before undertaking the research and exposes the community to unacceptable risks of consequential impacts if approvals allow the project to move forward.
- The assessment was prepared by the proponent's consultant, and Technical Report 4 does not show any independent review of the pre- and post-mitigation ratings; the proponent in effect marks its own homework.
- Residual risk indicators are a key decision-making tool in determining a project's approval, if no substantive justification and detailed outline of mitigation measures are available – the ratings analysis is inaccurate, unreliable and places affected communities and landholders at greater risk.

Objection 8

Clear and consistent evidence of bias in promoting potential positive impacts of the project, while downplaying the negative impacts.

> Evidence

- Table 6.1 states that the Strategic Benefit Payment Scheme is considered a "diversification of income" with a medium level impact and likelihood of "possible". This is a gross misrepresentation of affected landholder feedback that continually communicate that the compensation payment is inadequate, meaning that this should be rated as a low positive impact at best and certainly not communicated as an "opportunity for income diversification."
- Table 6.2 shows a clear bias to promoting positive impacts to local businesses and employment opportunities – providing three positive impact areas while failing to list potential business disruption and income losses to existing businesses and industries, including agriculture, transport and tourism as well as disruptions to local supply chains. The modest opportunities for local businesses and employment are significantly over-inflated in the current assessment, especially when compared to the potential disruptions to existing, long-term businesses in the region (which has already been established in the parliamentary enquiry into the impact of Renewable Energy Zones on regional communities).
- At the same time, the project is considered to have a low residual impact on critical community concerns that experience long-term structural challenges in access to health care and access to housing – even in the community centres that are likely to experience population increases of over 20 percent (table 6.2).

> Why it matters

- Such examples can unfairly sway decision-makers in their approval processes and reduce the appetite for further investigation where needed.
- Such examples jeopardise accuracy and accountability of the social impact assessment findings. breaking down community trust and raising serious accountability questions
- This also speaks to the highly disproportionate decision-making powers and systemic weaknesses in procedural fairness that have been raised strongly by affected communities and landholders throughout the report. Many respondents (57%) do not believe their views will be considered at all in the planning process. Only 5% believe their views will be considered to a large or very large extent, underscoring a widespread perception of procedural exclusion rather than participation (also demonstrated by Appendix 1).

Objection 9

The Social Baseline of the report has several inconsistencies and errors, confusing the reader as to what information is being used in each scoring section and how information is being used to determine outcomes. This is intensified without a complete publishing of the methodology.

> Evidence

- Barry, the proposed site of Camp 3, scores zero on all three socio-economic indices and has no physical access, remoteness or vulnerability rating (Table 3.9, p. 74).
- Walcha is rated Medium for vulnerability to change, while Niangala (very low physical access) and Glenbawn (no physical access) are rated Low, although Technical Report 4 says twelve small communities have no services and 20 have very low access (p. 76).
- Technical Report 4 states the Walcha LGA population as approximately 5,971 (p. 49), the same figure it gives for Uralla (p. 44), while a later Walcha profile shows 2,475. A later table appears to give a Walcha population of 3,016 (PDF p. 292), making the baseline population used for Walcha unclear.
- There are contradictory statements within the social impact assessment such as, ""The CATI survey was implemented to obtain a representative sample from the broader community." And (2026:31): "The views of the community represented throughout the report are based on the sample of community members and stakeholders consulted as outlined in Section 2.5, and "do not necessarily represent the views of the entire community."
- Three different inconsistent views about comparing the three datasets, 2026 page 84 "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared", then 2026 Appendix E:1: "The CATI survey has been developed so that key questions can be compared to the outcomes of the Online Community Survey (2025 and 2026)." and finally, 2026 page 89: "Due to differences in question structure between the CATI survey/2026 online survey and 2025 online survey, direct comparison of results is limited."

> Why it matters

- While critical information outlining the methodology and scoring system remains undisclosed – it is understood that the vulnerability to change baseline is critical in determining how impacts are rated in terms of their severity. Errors and gaps in this analysis therefore pose great risk to affected communities and landholders. These errors and gaps within the analysis directly influence outcomes for communities and will likely result in significant unforeseen negative impacts.

Objection 10

Discrepancies within the community engagement survey sampling are significant and yet, while remaining unaddressed, the data collected is still used to inform the social impact findings.

> Evidence

- Technical Report 4 states that landholders had not consented to field investigations and that, where agreements are absent, investigations are not undertaken and conservative assumptions from public data are used (p. 105). The assessment is therefore least informed where impacts are most concentrated.
- Participation fell sharply. Both online surveys were self-selected, with about 532 responses in 2025 (during the time of studying views relating to a different project) but only 90 in 2026, after the corridor was announced. This drop in participation and only 90 responses out of a 250km+ project is not a representative sample size of community views to this current corridor.
- The 2026 phone (CATI) survey completed 600 interviews from 11,446 phone numbers that were attempted (therefore only 5.2% responded). Furthermore, the phone sample does not reflect the wider community demographics, with older residents aged 70–79-year-olds making up 22.7% of the sample (only 14.5% of the population) and 20–29-year-olds make up 1.7% of the survey (5.3% of the population). Younger residents are under-represented.
- In addition, only a handful of respondents were directly affected. About 24 CATI and about 13 online respondents self-identified as affected landholders. Therefore - the views of the people closest to the line carry little weight in the data when it can be considered that there were hundreds of directly impacted people (because each of the 150+ farms/ land parcels generally involved multiple residents).
- The NSW SIA guideline states that “the SIA assesses social impacts within the social locality which is defined by where people are likely to experience those impacts”. For this transmission project (transmission easements alone), 24% of the line impacts the Walcha LGA, 25% the Upper Hunter LGA, 23% the Uralla LGA, only 3.5% the Armidale LGA, 13.5% the Tamworth LGA and 11% the Muswellbrook LGA. When you add in camps and hubs for Walcha, Gundy and Uralla their percentages increase even further. This study does not proportionately measure the views of these communities for the SIA – effectively misrepresenting the views of the social locality.
- Technical Report 4 does not state the basis for the sample size, margin of error of confidence level. Fragmented across 6 LGAs, it is insufficient for any sub-group analysis.

> Why it matters

- A social impact assessment is only as good as the evidence behind it. In this survey, people living on and next to the current corridor were the least engaged, leading to assumptions from a small sample of public data is used to represent community perceptions.
- Where evidence is thin, impacts are described as “perceptions” or rated on the basis of an assumption. This makes it easier to rate impacts as lower than lived experience would suggest, and it makes the assessment impossible to test. A decision-maker cannot be confident the findings describe this route, these properties and these communities.
- Furthermore, there is a significant and statistically meaningful lower number of engaged participants in the second round of surveys and consultation period (the current route) i.e. 532 responses pertaining to a different line and only 90 online survey responses pertaining to this project. This lower number

indicates that there is not enough data on the current route's social impacts (the sample size is not large enough for its confidence intervals can be considered representative) to make decisions or determinations.

- Finally, the proportion of Walcha, Uralla and Upper Hunter people engaged is misrepresentative to the project footprint in these communities. This essentially means that feedback and perceptions of survey participants living in larger regional centres (less impacted by the project) receives greater value in determining the severity of social impacts which is not methodologically sound.
- It is evident that sentiments for the communities that are most impacted have not been adequately addressed based on the recent community survey of landowners in the Walcha LGA where landowners were asked if they were willing to host any renewables infrastructure (i.e. BESS, Transmission, Hubs, Solar or Wind). Over 508 landowners were reached out to, 28 responding in favour/ as interested, over 357 responding no interest and remaining 123 awaiting response at time of report. Results in image Appendix 2.

Objection 11

The reader is unable to determine the Vulnerability to Change Analysis methodology based on the information provided in the EIS Technical Report 4 – highlighting significant accountability and transparency concerns.

> Evidence

- Technical Report 4 states that "Based on the indicators presented in Section 2.3.2, a qualitative rating of Community Vulnerability to Change has been assigned to each locality/suburb along the project area, categorising each community as having a high, medium or low scoring of vulnerability to change. Outcomes of this analysis has then been used to provide a qualitative assessment of vulnerability to change across affected communities." The document does not provide any information on how the scoring is completed.
- The selected indicators for the Vulnerability to Change Analysis are not comprehensive to the scope of the Social Baseline – primarily using secondary economic data and remoteness in determining vulnerability to change.
- All suburbs are classed Inner or Outer Regional using the ABS classifications. This is a broad classification system that does not measure travel time to emergency care, access to other services – including education. Technical Report 4 itself says suburbs within a class "are not equal", yet still treats the class as a measure of remoteness.
- While the Physical Access Score (PAS) indicator outlined in the report is used to assess a community's access to essential services, this tool has been developed in-house by the authors and provides no additional information in methodology or peer review.
- There is no evidence of using basic public health, education or social services indicators to determine vulnerability to change.

> Why it matters

- Independent experts, key stakeholders, relevant departments, decision makers and the affected communities need to be able to understand the information used, how it is weighted and justification for vulnerability scoring – as this has several ramifications as to how impact severity and likelihoods are later determined. Without this information, relevant stakeholders, affected communities and landholders are limited in their ability to review the project analysis on its merits and ask questions of the findings where necessary and challenge the scoring it has been assigned.
- Affected communities and landholders need to understand how conclusions about their way of life, community and sense of place have been determined. Not providing this information raises several transparency and accountability concerns, leading to increasing levels of mistrust within the project assessment processes.

Objection 12

The Department of Health, Department of Communities and Justice, Department of Education, were not consulted in the development, delivery or review of findings to the EIS Social Impact Assessment.

> Evidence

- The stakeholder engagement summary does not reference any Government Departments responsible for service provision and policy development related to essential services likely to be impacted by the project.
- The data sources used to develop the social baseline and vulnerability to change analysis does not reference any Government Departments responsible for service provision and policy development related to essential services likely to be impacted by the project.

> Why it matters

- One of the promoted comparative advantages of EnergyCo is that it is a NSW Government Statutory Authority that should have the resources and access to engage line ministries and departments to deliver positive outcomes for affected communities in areas where mandates align. To not take advantage of such expertise and resources in determining the social impacts on affected communities raises significant accountability questions and shows an organizational culture that is not open to feedback or taking the necessary steps to understand the on-ground situation and coordinate to deliver lasting solutions.
- By not engaging line ministries and departments in the development of the social impact assessment, EnergyCo has placed an unnecessary technical burden on affected communities, increasing the likelihood of missed or undervalued impacts and exacerbating campaign/consultation fatigue of affected communities and landholders.

Objection 13

The Authors of the report continually use language, assumptions, generalizations and draw misleading and unethical lines between data sets to build a narrative that belittles community feedback, downplays affected community and landholder concerns and undervalues community impacts in an effort to sway the reader towards its employer's objective of proceeding with the project with as little mitigation and remediation required.

> Evidence

- Technical Report 4 continually has examples of unethical or misleading conclusions being drawn on primary data sets. For example "Attitudes towards the project are highly divided. Survey findings indicate that while a substantial proportion of respondents are supportive of, or can tolerate, the project, a minority express strong opposition."

  When looking at the primary data presented, 2026 online surveys showed that 53% of respondents "rejected" the project and 2025 online survey, 56.1% stated that they had the lowest level of acceptance on the attitude spectrum presented. These figures are not highly divided, proving that the majority of respondents expressed a strong opposition to the project.
- Another example of unethical and misleading summary statements can be seen in comparing the results of affected landholders perceptions to climate change benefits of the project. The report states that *"no project-affect landholders who responded to the CATI survey commented on the benefits of addressing climate change which may indicate a relationship between the degree of direct impact someone may experience and their perceived level of importance for broader or systemic benefit."*

  This is an example of an assumptive comment that is not supported by evidence and is used to downplay and undervalue the voice of affected landholders. There are several legitimate reasons (which were not explored) as to why a survey participant may not see the project delivering on broader benefits.
- The statement, *"In summary, community attitudes towards the project reflect conditional acceptance rather than broad social licence"* is another example of misrepresenting data. The data clearly shows a strong rejection of the project from survey participants, yet the authors continue to use language like "conditional acceptance" to meet the position of their employer (EnergyCo) - delivering a biased and inaccurate account of the survey data.
- The statement, "*The fear, stress and uncertainty causing the heightened perception of impact upon private property of the easement acquisition is understood to be greater than the impact to be realised for agricultural properties where the easement is proposed to traverse."* is another generalized/misrepresentative statement that is not supported by academic evidence or community feedback.

> Why it matters

- This speaks to the highly disproportionate decision-making powers and systemic weaknesses in procedural fairness that have been raised strongly by affected communities and landholders throughout the report. Many respondents (57%) do not believe their views will be considered at all in the planning process. Only 5% believe their views will be considered to a large or very large extent, underscoring a widespread perception of procedural exclusion rather than participation.
- If the language of reports is constantly undervaluing affected communities feedback and voice and watering-down results to promote a positive image of the project, distrust and lack of engagement in the process grows. Affected communities need to be heard and engaged in the planning process to deliver

positive results – how their feedback is discussed and reported is important in gaining a social licence for the project to proceed.

- Landholders and community members do not pretend to be engineers and doctors, but do know their businesses and farm operations. How the project is likely to affect affected landholders' lived experiences and livelihoods needs to be seen as accurate and meaningful feedback and treated as such, not washed over by broad and assumptive statements – used to solely benefit the author's employer (EnergyCo) in downplaying and undervaluing community feedback. This needs to be rectified throughout the report.

Objection 14

Authors have failed to authentically communicate the diversity and identity of the towns and areas affected - omitting important economic, environmental and social information.

> Evidence

- Using Walcha as a case-study, but not limited to – Section 3.2.3 outlines a description of the Walcha area primarily based of secondary data and ABS statistics. Refer to table 3.2.
- This section does not include any qualitative information or community feedback on what is valued in the town, how the town is growing, or what the strategic direction for the town and community is.
- The table presented does not highlight the growing tourism industry and emerging retail businesses and does not provide insights into way of life, lived experience or the community's sense of place.

> Why it matters

- If the authors of the report do not genuinely understand the communities in which they are assessing, it is highly likely that the risk analysis and social vulnerability analysis has several blindspots – greatly increasing the risk of unforeseen and consequential negative impacts brought about by the project.
- Affected communities and landholders are more likely to engage and participate in the project assessment and design when their voice and feedback is evident in the assessments undertaken. Failure to capture the community voice only leads to increasing distrust and lack of engagement in the planning process and increasing local opposition to the project. As per the social surveys undertaken, "Many respondents (57%) do not believe their views will be considered at all in the planning process. Walcha respondents report the most acute loss of confidence, with 74% stating that their views will not be considered, compared with around half of respondents in other LGAs the project traverses."
- Social cohesion ensures that small regional towns thrive. If these intangible components of a community cannot be effectively captured in the assessment documentation, there is a great risk of the eroding of social cohesion throughout the planning and implementation phases - leading to long-term social impacts. There are numerous commentaries on the erosion of social cohesion in Report 62 (2025).

Objection 15

Inconsistencies in evidence between cumulative impacts and sector specific impacts throughout the social evaluation and assessment of Technical Report 4.

> Evidence

- Within the Cumulative Impacts section of Technical Report 4, it clearly highlights that there are high risks to suburbs or localities with multiple pipeline projects and concentrated workforces – particularly in accessing basic services and housing. Suburbs and localities named include, Kentucky, Walcha, Uralla, Muswellbrook, Scone, Timor, Waverly, Muscle Creek, and Hebden.
- As an example, but not limited to, suburbs/localities Kentucky and Walcha are likely to experience "heightened levels of social impact due to their medium levels of community vulnerability and the proposed presence of compounding project activities." Stating that there will be "a concentrated but prolonged period of workforce presence in Walcha in the early 2030s, with clear implications for local housing capacity, services and community infrastructure." (page 165). However, when reviewing concerns on housing and access to services in the Social Impact Assessment Table 6.2. the residual risk is considered low.

> Why it matters

- As per the cumulative assessment, "distribution of workforce demand has important social implications, including variable pressure on housing and accommodation markets, health and community services, local roads and amenities, and community cohesion. The larger service centres are better positioned to absorb short-term peaks due to greater service and housing capacity, whereas smaller townships are more vulnerable to sustained cumulative pressures, particularly where elevated workforce levels persist over several years." Yet when the risk analysis has been conducted it has assessed the risk based on the total project coverage area, failing to account for the specific impacts individual communities will experience.
- EnergyCo's alignment for the transmission corridor disproportionately impacts vulnerable communities – particularly when considering the location of multiple generation projects proposed within the portal. Greater consideration of vulnerable populations and the affected communities' capacity to cope with multiple projects is needed.
- The cumulative impact section clearly outlines that there is a disproportionate and significant impact to housing, health and community services, local roads and amenities, as well as community cohesion affecting the most vulnerable communities – which has been vastly downplayed by the authors of Technical Report 4 in the relevant sections. This shows that the transmission project needs to be assessed within the bigger picture of the Energy Zone. Failure to effectively engage affected communities and landholders on the scale of the potential impacts within the Region allows for a significant misrepresentation of data and an under-representation of consequential impacts, which is most favourable towards the project proponent. Each section of the Technical Report 4 should better acknowledge the cumulative impacts of all projects and detail the expected impacts on specific social locations.
- It is also worth noting that, coordination and timing of project rollouts was previously used as a key mitigation against negative impacts to housing, health and community services, local roads and amenities, and community cohesion. However, based on the projected timeframes and workflows presented in the cumulative projects section – operational coordination between projects would have minimal (if any) influence in reducing the negative impacts of cumulative projects in the affected communities – particularly those most vulnerable to change.

3 | Requests

We request the following steps be taken to ensure that the EIS Technical Report 4: Social Impact Assessment is fit for purpose, effectively reflects community feedback and outlines clear risk analysis of potential impacts and mitigations specific to each affected community. No approval of the EIS Technical Report 4: Social Impact Assessment could be granted without the following:

1. Remove first-route data. List every data set, survey result, quote and finding drawn from investigations of the first route, and remove each from the assessment of the current route unless it is shown, with reasons for each, to remain valid. (Objections 2, 3, 9)
2. Redo community engagement surveys on the current corridor, with proper targeting of affected populations and full disclosure of the scale of the project, including the camps and hubs. Survey development and implementation should involve the community, and include targeted questions on project-specific components. (Objections 1, 2, 3, 10)
3. Engage independent experts to design, implement and review the community surveys and qualitative data, and to oversee the development and findings of the vulnerability to change analysis and social baseline methodology, so that the baseline is transparent and accountable. (Objections 4, 10, 11)
4. Publish full survey and sampling details: the survey instruments, CATI script and ethics documentation, the call-disposition breakdown, the basis for the sample size and its allocation across LGAs, how self-selection, age skew and non-response were corrected, and how many directly affected landholders took part. (Objection 10)
5. Assess the social impacts of the workforce camps themselves, not only as a mitigation for housing pressure, with community participation in their siting, design and operation. (Objection 1)
6. Correct and revise the social baseline of each community, including the Walcha population figures, the missing ratings for Barry (Camp 3), the Niangala and Glenbawn ratings, and the contradictory statements about the CATI sample and the comparability of datasets. The revised baseline should describe each social locality using qualitative data and community feedback, capturing intangible strengths and the diversity of each community. (Objections 9, 14)
7. Revise the vulnerability to change analysis to use standard, holistic indicators of access to services (including health, education and community services, and travel time to emergency care) and the capacities of local economies. Remove the in-house Physical Access Score and replace it with standard indicators. (Objection 11)
8. Provide the full methodology for the social baseline, vulnerability to change, and pre-mitigation and residual risk ratings, including the indicators, weighting and scoring systems, and detailed descriptions of frequency and severity. (Objections 4, 9, 11)
9. Revise the risk analysis methodology so that it is location specific and reduces assumption, bias and subjectivity, and engage affected communities and landholders in the rating process to validate the results. (Objections 4, 5)
10. Commission an independent review of the likelihood, magnitude and residual ratings, publish the results, and correct any ratings found to overstate benefits or the effectiveness of mitigation (for example the Strategic Benefit Payment Scheme, improved access roads and the Table 6.2 impacts). (Objections 4, 5, 7, 8)
11. Show any rating that depends on a plan not yet written as its pre-mitigation rating until the plan is provided and tested. (Objection 7)

12. Exhibit draft versions of every plan relied on as mitigation (including the SIM Plan, Community Wellbeing Strategy, CSEP, LIPP, Workforce Management Plan and the property, biosecurity, water, noise, traffic and emergency response plans) before the project is determined. Each should set out key strategies, timelines, budgets, responsible parties, measurable targets, thresholds and corrective actions, the skills and qualifications of personnel relied on, the processes for development, approval and implementation, and the mechanisms for community engagement, review and feedback. (Objections 5, 6, 7)
13. Engage the relevant NSW Government departments, including Health, Communities and Justice, and Education, in the assessment and review. This will reduce the consultation burden on communities, reduce unforeseen impacts and improve the success of mitigation measures. (Objection 12)
14. Revise the report to show how cumulative impacts are factored into the overall risk analysis in section 6 of Technical Report 4 and the EIS, so that project-level ratings are consistent with the cumulative assessment, and set out how cumulative impacts will be managed with the responsible service agencies. (Objection 15)
15. Remove generalised language, broad assumptions and misleading summary statements, and ensure all technical information is properly referenced. Revise statements that dilute or downplay community feedback (including "conditional acceptance", "highly divided" and "perceptions") so that they accurately reflect the primary data. (Objections 8, 13)
16. Re-exhibit the corrected and independently reviewed Social Impact Assessment and EIS for public comment before determination, and confirm how the SEARs requirements listed in section 2 are met or require the EIS to be amended. (Section 2 and all objections)
17. Answer the questions in section 5.

4 | Questions Requiring Further Response

While the objections above clearly highlight the need for the social impacts assessment to be re-done there are some further questions that need addressing specifically also below. Please also see Appendix 3 with expert report into the methodological issues raised by the Valley Alliance Group (also submitted as an independent submission by Valley Alliance). Questions are numbered for ease of response.

1. Where in the EIS is the engagement shown to be consistent with the Undertaking Engagement Guide for State Significant Projects (DPIE, November 2021)? Which community groups were consulted in preparing the assessment, and why were the groups in Appendix 1 not contacted directly by the authors of the social impact assessment?
2. Where does the EIS explain how the project design was amended in response to community issues (including the corridor change), and, where no change was made, why not?
3. Which of the SEARs requirements listed in section 2 does the Department consider are satisfied, and on what basis, given the objections raised? Will the Department require the EIS to be amended and re-exhibited if the social impact material does not meet the SEARs?
4. Which NSW Government departments responsible for essential services (including Health, Communities and Justice, and Education) were consulted in developing, delivering or reviewing the social impact assessment? If none, why not, and will they be engaged before the project is determined?

5. Which data, survey results, interview material, quotes and ratings in TR4 and the EIS were collected during investigations of the first route, and where is each identified? Which findings, ratings and survey results rely on data collected before the route change, and how was that data adjusted or excluded?
6. What steps were taken to confirm that data from the first route is valid for the revised route, and what was the result for each topic?
7. TR4 says responses across the two online surveys cannot be merged or directly compared. Why then are 2025 responses used to describe the current alignment (for example in the combined summary of "community values"), and where is this shown?
8. By how many kilometres, and in which direction, did the corridor move? Which communities, properties and households moved in or out of the study area, and which are now on the revised route but were not engaged or surveyed on it?
9. Will EnergyCo remove first-route data from the assessment, re-run the impact ratings using data collected on the revised route, and re-exhibit the corrected assessment so the community can review it?
10. Why were the locations and size of the workforce camps and hubs not disclosed before most community engagement took place, and how can the assessment reflect community views on camps that residents had not been told about?
11. Where does TR4 assess the social impacts of the workforce camps themselves (safety, traffic, water supply, local services and neighbouring landholders), rather than treating them only as a mitigation for housing pressure? What role will the community have in the siting, design and operation of the camps?
12. The online survey instruments are not included in the reports. Please provide them, together with the CATI script and the ethics approval documentation.
13. How many directly affected landholders (not self-identified) took part in the survey and engagement, out of how many on the current corridor? Why were only about 24 CATI and 13 online respondents self-identified as affected?
14. What is the basis for the CATI sample size of 600, including the margin of error and confidence level? How was the sample allocated across the six LGAs compared with the share of the line each LGA hosts, and was any sub-group analysis possible?
15. What was done to correct for the self-selected online samples, the age skew in the CATI sample, and the 34% decline rate? Were results weighted, and if so, how?
16. What was the breakdown of refusals, non-contacts and ineligible numbers among the more than 10,000 numbers that did not result in an interview? Please provide the full call-disposition table.
17. Where landholders declined access, which topics were assessed using only public data, and how was the assumed rating tested against community evidence?
18. Will EnergyCo commit to a further round of social research on the current corridor, designed and overseen independently and with community input, before the EIS is determined?
19. What is the correct population of the Walcha LGA and of each community near the camps and hubs, and which of the figures in TR4 (5,971, 3,016 and 2,475) is used in the ratings?
20. Why does Barry, the proposed site of Camp 3, have no vulnerability, remoteness or access rating, and how does this affect the rating of impacts at Camp 3?

21. Why are Niangala (very low physical access) and Glenbawn (no physical access) rated Low for vulnerability when TR4 says 20 small communities have very low access and twelve have no services?

22. Please provide the method, indicators and weights used to calculate vulnerability to change, and a corrected table. Why was an in-house Physical Access Score used, has it been peer reviewed, and why are public health, education and social services indicators not used?

23. Was travel time to emergency health care measured for each community? If not, why is the Inner/Outer Regional classification treated as sufficient?

24. TR4 makes contradictory statements about the CATI sample ("representative" against "do not necessarily represent the views of the entire community") and about whether the datasets can be compared (see TR4 pp. 31, 84 and 89 and Appendix E). Which statements reflect how the data was actually used, and will the report be corrected?

25. Why do the community profiles (for example Walcha in Section 3.2.3) rely mainly on secondary data, without community views on what is valued, how the town is growing, or its tourism and retail economy? Will the baseline be revised with community input?

26. Please provide the full method used to determine pre-mitigation and residual ratings, including definitions of likelihood and severity and any weighting. Why was a basic risk matrix used for a project of this scale?

27. Has any independent party reviewed the likelihood and magnitude ratings, or were they validated with affected communities and landholders? If not, will the Department commission an independent review and require community validation?

28. On what basis were "improved access roads" and the Strategic Benefit Payment Scheme (as "diversification of income") rated as medium benefits, given landholder feedback that compensation is inadequate?

29. Why does Table 6.2 list three positive impacts for local business and employment, but no negative impacts for existing businesses (including agriculture, transport and tourism)?

30. For each of the 13 negative impacts that remain after mitigation, which specific mitigation measure supports the residual rating, and what evidence shows that the measure works? For example, why is increased stress and anxiety rated A/4 before mitigation but low after?

31. Which residual ratings depend on a plan that has not yet been written, and what would those ratings be without it?

32. Why is the residual impact on access to health care and housing rated low in communities expected to see population increases of over 20%?

33. TR4's cumulative assessment identifies high risks for places such as Kentucky, Walcha, Uralla and Muswellbrook. Why are the project-level ratings for these places not higher, and how are cumulative impacts factored into the overall risk analysis in section 6? What specific plans, developed with the responsible service agencies, will manage cumulative impacts?

34. Coordination and timing of project rollouts was previously relied on as a mitigation. Given the overlapping timeframes in the cumulative assessment, how can it still be relied on?

35. Why are the SIM Plan, Community Wellbeing Strategy, CSEP, LIPP and Workforce Management Plan not provided in draft with the EIS? Will the Department require draft plans to be exhibited, with a genuine opportunity for the community to comment, before determination? If not, how will the community have a say?
36. For each mitigation measure, what are the specific action, timeframe, budget, responsible party, target and consequence if the target is missed? What are the targets, thresholds and corrective actions for each measure in Table 7.2, and who enforces them?
37. Who will monitor and report on the effectiveness of each measure, will reports be public, and will the community be involved in reviewing them?
38. Will the Department make approval conditional on the plans being approved by an independent party, and will the community be consulted on them?
39. What funding, and from what source, has been committed to deliver the Community Environmental Benefit Plan, and when will its content be determined?
40. What lessons from the Central-West Orana REZ, including the findings of Inquiry Report 65 and its recommendation that social impact assessments be independently verified, have been applied here, and where is this shown in the ratings?
41. TR4 describes community attitudes as "conditional acceptance" and "highly divided", while its own data records 53% rejection in the 2026 online survey and 56.1% at the lowest level of acceptance in 2025. What is the basis for this description, and will it be corrected?
42. What evidence supports the statements that fear and stress about easement acquisition are greater than the impact to be realised, and that no project-affected landholders commented on the benefits of addressing climate change? Will these statements be substantiated or removed?

5 | Objections Summary List – Quick Reference

1. We object to the social impact assessment on the following grounds (see full details above in report):
2. The EIS Social Impact Assessment SEARS requirement *"An assessment of the social impacts in accordance with Social Impact Assessment Guideline and consideration of the need for construction workforce accommodation"* has not been sufficiently met as the social evaluation and assessment of the camps has not taken place.
3. The survey data used to inform the Social Impact Assessment has not been consistently targeted to affected communities – as surveys were conducted prior to the announcement of the line assessed within the EIS. This is likely to have misrepresented affected community concerns and influenced the risk analysis component of Technical Report 4.
4. The survey data used to inform the Social Impact Assessment has been collected prior to the full scope of the proposed project being announced – likely misrepresenting affected communities' perceptions of the proposed project and the scale of the cumulative impacts presented.
5. Risk analysis framework and processes are subjective, lacking transparency, community participation and independent oversight.

6. Soft or light touch mitigation actions are over-inflated in their ability to remedy high risk impacts that have been identified by communities. Highlighting inconsistent and subjective risk analysis throughout Technical Report 4.
7. Mitigation measures primarily propose future planning tools to be developed without any guarantees of community participation in planning, development, implementation or decision-making.
8. The residual ratings have been predetermined throughout the Social Assessment when the vast majority of mitigation measures listed have not been developed, designed or planned – lacking all consequential detail needed to determine if the residual risk has been reduced.
9. Clear and consistent evidence of bias in promoting potential positive impacts of the project, while downplaying the negative impacts.
10. The Social Baseline of the report has several inconsistencies and errors, confusing the reader as to what information is being used in each scoring section and how information is being used to determine outcomes. This is intensified without a complete publishing of the methodology.
11. Discrepancies within the community engagement survey sampling are significant and yet, while remaining unaddressed, the data collected is still used to inform the social impact findings.
12. The reader is unable to determine the Vulnerability to Change Analysis methodology based on the information provided in the EIS Technical Report 4 – highlighting significant accountability and transparency concerns.
13. The Department of Health, Department of Communities and Justice, Department of Education, were not consulted in the development, delivery or review of findings to the EIS Social Impact Assessment.
14. The Authors of the report continually use language, assumptions, generalizations and draw misleading and unethical lines between data sets to build a narrative that belittles community feedback, downplays affected community and landholder concerns and undervalues community impacts in an effort to sway the reader towards its employer's objective of proceeding with the project with as little mitigation and remediation required.
15. Authors have failed to authentically communicate the diversity and identity of the towns and areas affected - omitting important economic, environmental and social information.
16. Inconsistencies in evidence between cumulative impacts and sector specific impacts throughout the social evaluation and assessment of Technical Report 4.

Appendix 1
media release from local community groups

MEDIA RELEASE

FOR IMMEDIATE RELEASE

25 MAY 2026

Communities call on Premier Chris Minns to intervene after consultation descends into Trespass Allegations, Police Reports and Claims of Misconduct

NEW ENGLAND AND UPPER HUNTER, NSW - Community groups, residents and landholders from the Upper Hunter and New England regions have called on Premier Chris Minns to personally intervene in the New England Renewable Energy Zone (REZ) rollout following a series of allegations involving EnergyCo's consultation process under Minister Penny Sharpe.

The body says the Minns Government has allowed the consultation process to deteriorate to the point where communities are alleging trespass on private property, misleading conduct by contractors, failures in community engagement, omissions in environmental documentation and incidents resulting in police reports being filed.

Community representatives say responsibility now sits directly with Premier Minns and his Government, and are demanding he personally meet with affected landholders, suspend the current consultation process and commit to an independent review of how the REZ is being managed across the region.

Effective immediately, the body has suspended all participation in EnergyCo's New England REZ consultation process. The groups say that unless Premier Minns intervenes directly and commits to reforms by 18/6/26 , they will permanently withdraw all cooperation and engagement with the process.

The body says confidence in EnergyCo and the consultation framework overseen by Minister Sharpe has collapsed, with many residents believing the process is focused on progressing predetermined outcomes rather than genuine community consultation.

Among the specific incidents cited by the body are:

- **Unauthorised Entry & Police Involvement**
  EnergyCo representatives or contractors entered private property without permission, resulting in landholders ordering them off the premises and a police report subsequently being filed.
- **Misrepresentation**
  Contractors allegedly misrepresented their identities and objectives when questioned by local residents.
- **Official Misconduct and Dismissal**
  An EnergyCo employee was recently dismissed following an incident in a regional café, where they were reportedly overhead making disparaging remarks about local residents and the organisation responsible for community engagement.
- **Community Distress**
  A Walcha resident was approached regarding a proposed transmission corridor on their land without prior warning or engagement, causing significant distress.
- **Environmental Omissions**
  Government documentation allegedly omitted critical endangered species information during inter-agency consultation, which was only rectified after concerns were raised by Forestry NSW staff.
- **Predetermined Outcomes**
  Senior project representatives allegedly stated the REZ would proceed "no matter what" and that the project footprint would be expanded, reinforcing local concerns the consultation was merely a rubber-stamping exercise.

CONT OVER >

WALCHA HIGH COUNTRY GUARDIANS

PROTECT THE VALLEY UPPER HUNTER

Voice for Walcha

Rouchel Brook ACTION GROUP

ReD 4NE

Friends of Kentucky Action Group

Salisbury Plains ACTION GROUP

BATTING FOR BOORLONG ACTION GROUP

VALLEY ALLIANCE
Our Homes, Land, Community & Future

DUNGOWAN CREEK ALLIANCE

MEDIA RELEASE - QUOTES

25 MAY 2026

Federal Member for New England Barnaby Joyce said Chris Minns promised regional communities would be partners in this transition. "Instead, people are reporting contractors entering farms without permission, police reports being filed, and a consultation process that many locals believe was decided before it even began," Mr Joyce said. "When officials are allegedly mocking the very communities they are meant to engage with, the Premier cannot wash his hands of it. This process is happening under his Government and under his Minister's watch."

Member for Northern Tablelands Brendan Moylan said more than 20,000 people backed the ePetition opposing the new transmission corridor, yet the Minns Government continues to ignore affected landholders. "EnergyCo has repeatedly failed to properly engage with communities during the renewable energy rollout," Mr Moylan said. "Landholders deserve genuine consultation, not press releases and bureaucratic spin."

NSW Shadow Minister for Energy James Griffin said the Minns Labor Government spend a lot of time talking about community benefits, but they won't even meet with the communities they're impacting the most. "The energy industry has made it clear they need the Minns Labor Government to do more than issue press releases and pose for photo opportunities to build social licence in regional communities," Mr Griffin said.

The body spokesperson Damien Timbs said local families have given thousands of hours to this process in good faith, only to see their goodwill abused. "We will not continue participating in a process that asks communities to provide legitimacy while their concerns are ignored," Mr Timbs said. "This is a line in the sand. It is unacceptable that decisions affecting New England families are being driven by an organisation with diminishing community trust and little genuine local representation."

END

MEDIA CONTACT

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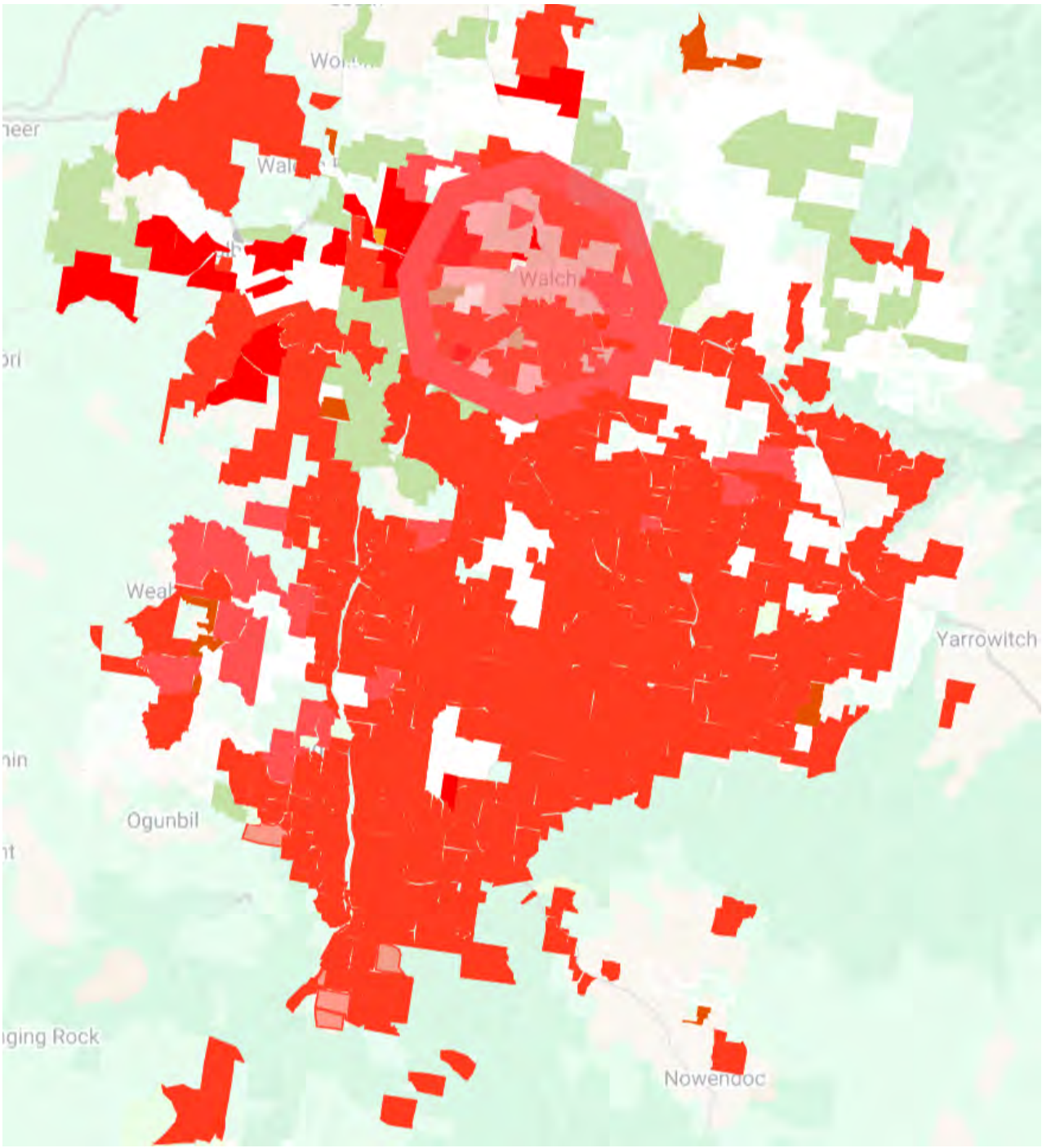
Photos and footage available on request.

Appendix 2
Map from Walcha LGA – landowner response to interest in hosting renewables



Comment: Information volunteered by landholders in the Walcha LGA.
Red indicates no interest in hosting projects, Green indicates interest, White indicates that they are not prepared to comment.

Appendix 3
Valley Alliance – Social Impact Assessment Expert Report

Attached over

VALLEY ALLIANCE
Our Homes, Land, Community & Future

SUBMISSION IN RESPONSE TO THE ENVIRONMENTAL IMPACT STATEMENT

New England REZ Network Infrastructure Project

Application No.: SSI-74175972
EPBC ID No.: 2025/10405
Assessment Type: State Significant Infrastructure
Development Type: Electricity supply
LGA: Muswellbrook Shire
Exhibition Period: 15 October 2026 – 12 November 2026

Author: Dr Merryl Yan, PhD[1]. Committee member, Valley Alliance Inc.

Summary

This submission critiques the methodology of the Social Impact Assessment (SIA) for the New England REZ Network Infrastructure Project. It does not dispute the SIA's findings; it demonstrates that the findings are not supported by valid data. The SIA's primary data collection fails on five independent grounds, comprising more than twenty specific methodological and ethical breaches detailed below: no independent ethics review was conducted; informed consent was not obtained; the sampling methods preclude any statistical inference; data from no-longer-affected areas is included without valid justification; and no standardised instrument was used to measure the distress the SIA reports. The governing instruments — the NHMRC National Statement, the IAIA Guidance, and the NSW SIA Guideline — are breached. The proponent has no valid primary data on which to base its assessment of community-level social impact.

Summary Table

#	Failure	Governing Instrument	Consequence
1	No independent ethics/governance review	NHMRC (2025:8,9); IAIA Principle 15 (2025:33)	Data collection ethically unsound; findings compromised
2	Informed consent not obtained (no complaints procedure, no risk disclosure, no alternatives disclosed, non-participation potentially construed as non-objection)	NHMRC Chapter 2.2 (2025:17–19); IAIA Principles 2, 4 (2025:32); NSW SIA Guideline (2026:37)	Data collection invalid; consent not informed
3	Convenience/self-selected samples (online survey, CATI quotas, unconsented group consultations) preclude statistical inference	NSW SIA Guideline (2026:31); basic survey methodology	All quantitative findings and confidence intervals invalid
4a	Data from no-longer-affected area included without justification	Research integrity; NSW SIA Guideline (2026:31)	Potential dilution of reported impacts; analysis invalid

[1] Appendix 1 Biography

4b	One response per household suppresses intra-household diversity	NSW SIA Guideline (2026:31)	Under-represents affected views; cannot assess intra-household conflict
5	No standardised distress instrument (K10) used despite reporting on distress and despite explicit recommendation	Research validity; ABS standards	Distress findings unvalidatable, unreplicable, incomparable

This submission pertains to the Social Impact Assessment component of the Environmental Impact Statement, with a specific focus on the Methodology.

Methodology Critique: Ethical and Sampling Failures

The Social Impact Assessment's (SIA) data collection methodology is assessed here against three governing instruments:

1. the NHMRC National Statement on Ethical Conduct in Human Research (2023, as updated 2025) (National Statement);
2. the IAIA Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects (2025) (IAIA Guidance); and
3. the NSW Social Impact Assessment Guideline (2026).

The critique identifies five material methodological failures that, in combination, render the SIA's quantitative findings unreliable and its qualitative findings ethically unsound. Consequently, the proponent has no valid primary data on which to make statements regarding community-level impact or to develop targeted mitigation strategies.

Note that although the SIA was conducted by Umwelt, as a private consultancy commissioned by EnergyCo, this commercial relationship does not *ipso facto* place the data collection outside the scope of the NHMRC National Statement, which expressly applies to human research undertaken by 'governments, industry, private individuals, organisations or networks of organisations' (National Statement 2025: 7), nor outside the IAIA Guidance, which is specifically directed at 'SIA Practitioners/Consultants' and 'Project Developers/Proponents (private sector or government)' (IAIA 2025: i,6).

1. Absence of Ethics and Governance Review

Governing requirement:

- NHMRC National Statement: "A judgement that a human research proposal meets the requirements of the National Statement and is ethically acceptable must be made before research can begin." (2025: 7)

- NHMRC National Statement: A key component of a research governance framework is the requirement that human research must undergo ethics review in accordance with the requirements of this National Statement. “Research with a greater than low level of risk (as defined in Chapter 2.1) must be reviewed by a Human Research Ethics Committee (HREC)…approval must be obtained prior to the commencement of the research… Retrospective ethics approval is not supported by the National Statement" (2025: 8,9,84,103)
- IAIA Guidance Ethical Principle 1 (Respect for participants): "Part of this respect is implied by the terminology of 'participant' (rather than 'respondent' or 'subject'). An important dimension of this respect relates to ensuring the protection of persons with diminished autonomy and those who are marginalised or vulnerable." (2025: 32)
- IAIA Guidance, Ethical Principle 15 (Ethical governance): requires that there be an "ethical governance mechanism. Typically this implies that there should be a committee or other facility that can … review research protocols prior to the research taking place, oversee and/or monitor research activities, provide advice to practitioners and participants, and make judgements in relation to complaints. A professional association such as IAIA may be able to provide such a mechanism, alternatively this could be negotiated in conjunction with the impacted community or with a local authority (local, regional or national government), or a local university, etc." (2025: 33)

Critique:

The SIA involved the collection of primary data from members of the community — through surveys, interviews, meetings, community information sessions, Computer Assisted Telephone Interviews (CATI), and diverse stakeholder consultations — concerning a project with significant social, economic, and psychological implications for participants (forced proximity to dual HVTL, potential property devaluation, community division, and health-related distress). This is not "low risk" research.

No reference in the SIA can be found to a HREC or equivalent independent ethics and governance committee as having reviewed:

- the research protocol
- the informed consent process, or lack thereof
- the risk–benefit analysis for participants
- the data collection methodology and specific instruments

- the grievance/complaints mechanism

The SIA was commissioned by the proponent and conducted by the proponent's consultant. There is no evidence of any independent ethical oversight. This is a fundamental breach of the NHMRC National Statement, which requires that research projects involving humans, greater than low risk, must be reviewed by a Human Research Ethics Committee (HREC) and "a judgement that a human research proposal meets the requirements of the National Statement and is ethically acceptable must be made before research can begin and before full funding for the proposal is released." (2025: 8,9). It also breaches the IAIA Guidance Ethical Principle 15 (2025: 33).

Having meetings with DPHI "to obtain feedback on the SIA approach" (SIA 2026: 31), or seeking input from the National Practice Lead (Dr Sheridan Coakes), as suggested to a Valley Alliance Committee member in a meeting 4.3.2025, does not constitute independent ethical review.

Consequence: Without independent ethical review, there is no assurance that the research design minimised harm to participants, that the risk–benefit ratio was appropriate, that participants' rights were protected or that the data collection methodology was valid. The entire data collection exercise is ethically unsound, and any findings derived from it are methodologically compromised.

2. Failure of Informed Consent

Governing requirements:

- NHMRC National Statement Chapter 2.2 (General requirements for consent), paragraphs 2.2.2, 2.2.4, 2.2.6, and 2.2.20, (2025: 17–19)
- IAIA Guidance Ethical Principles 2 (Informed consent), 4 (Voluntary participation), and 15 (Ethical governance), (2025: 32,33)
- NSW SIA Guideline "Community Engagement"; "Authors and declarations" (2026: 31–38)

The data collection for this SIA — online survey, information sessions, community meetings and consultations conducted between 2023 and 2025 — cannot be characterised as having been conducted with informed consent. The failure is not partial or procedural; it is structural. Between 2025 and 2026 data collection following the alignment change continued without meaningful informed consent. The following five sub-points are set out in sequence because each is independently sufficient to establish the breach, and together they demonstrate that the consent framework was not merely incomplete but absent.

2.1 Community members unaware of data collection

The SIA states that "Quantitative and qualitative information collected through all engagement mechanisms have been collated, coded and analysed" (2026: 23). This data collection commenced in 2023 (SIA 2026: 22) and to the direct knowledge of Valley Alliance, and its networks, those community members who attended events between 2023 and 2026, including community information sessions, semi-structured interviews, and diverse meetings, did not know that data were being collected—they were not clearly advised that their comments would be recorded, analysed, and reported in a regulatory document that determines whether a project proceeds over their land.

By definition, a participant who does not know that data is being collected cannot provide informed consent — and was in fact never asked to do so. The IAIA Guidance is explicit that consent requires "sufficient information and an adequate understanding of the SIA research and the consequences of their participation" (Principle 2, 2025:32). No such understanding was possible where the very fact of data collection was undisclosed.

2.2 Participant Ethics Information Sheet not provided during consultations

The SIA includes a Participant Ethics Information Sheet as Appendix B. This document was not handed out, distributed, or otherwise quoted from or referenced at any point during the 2023–2025 consultation period. It was not included in any information pack, website, or verbal briefing provided to participants. Similarly, it was not made available to community members prior to any consultation in the second round of data collection, between 2025 and 2026.

The SIA falsely reports that considerations of the ethical guidance for research with humans “have been communicated to community participants through the Participant Ethics Information Sheet (see Appendix B) prior to commencing the targeted SIA engagement activities…” (SIA 2026: 13). Valley Alliance can testify that this unequivocally did not occur in any of the 2023-2025 stakeholder engagement activities. Other community representative groups would be able to testify similarly regarding 2025-2026 engagement activities.

The document's provenance raises further evidence. The file attached as Appendix C to the SIA carries the footer:

"Appendix B 22962_Appendix B_Social Baseline Dataset_Final.docx"

And all subsequent Appendices (except Appendix F) have footer labels out of sync with their recorded Appendix number. The Participant Ethics Information Sheet itself carries no Appendix label in its footer. This footer evidence is consistent with the Information Sheet being appended after the fact to satisfy a compliance requirement, rather than being an

integral part of the data collection process. Its presence in the SIA does not cure the fact that it was never operationalised during the period in which data was actually collected.

When a member of the Valley Alliance committee met with Umwelt/EnergyCo on 4.3.2025 to discuss SIA data collection methodology, and asked for a copy of the Participant Information Sheet, not only was there no Sheet available, the representatives of Umwelt and EnergyCo appeared not to have a professional understanding of such a document or its requirement in legitimate social research.

The National Statement (2025: 14–20) and IAIA Guidance (2025: 4,34) are explicit that free, prior, informed consent to data collection must be obtained. That consent requires an Information Sheet to be delivered to prospective participants in hard copy or verbally. Informed consent is also implicit in the NSW SIA Guidelines (2026: 37 footnote 7).

2.3 Risks of participation not disclosed; non-participation potentially construed as non-objection

The risks of participating in the data collection were never disclosed — either in the Information Sheet (which was not distributed) or verbally by any member of the EnergyCo/Umwelt team.

"Risk can be associated with the conduct of research or the proposed outcomes of the research"—the National Statement is clear that where there is a risk that participation in the research may cause psychological harm (including distress and anger) and social harm (including damage to social networks or relationships with others) along with impacts on social cohesion and property values, this must be considered as part of the risk assessment for ethical approval, and risks must be disclosed to potential participants (2025:13–15).

Further, at a meeting on 4 March 2025 with a Valley Alliance Committee member, EnergyCo/Umwelt suggested that non-participation in stakeholder engagement may be inferred to indicate non-objection.

This position is the antithesis of the ethical framework. The National Statement requires that participants understand that non-participation carries no consequence (paragraphs 2.2.6, 2.2.9, 2025: 17,18). Construing silence potentially as non-objection to a project — is a form of coercion by implication: it places the burden on affected people to actively and vocally object or risk being characterised as supportive. The IAIA Guidance (Principle 4) requires that "participation must be voluntary and not subject to any coercion" (2025:32). A process in which silence may potentially be read as approval is coercive by design.

It should be noted that community members could not raise issues of which they were unaware, and relied on EnergyCo and Umwelt to alert them to what they would have needed to know to make an accurate assessment of whether it was in their interests to participate. (See 2.5 below.)

2.4 Complaints/grievance procedure not disclosed

Participants were not made aware of any mechanism through which they could lodge a complaint about the data collection process, the handling of their responses, or the project's social impacts. The IAIA Guidance (Principles 15,16, 2025: 33) identifies "the provision of grievance procedures" as a core component of ethical governance. The NHMRC National Statement (paragraph 2.2.6, 2025:18) requires that participants be informed of how to make a complaint about the research. Neither requirement was met.

2.5 Alternatives not disclosed — specifically undergrounding

Informed consent requires that participants understand the full context of what they are being asked to comment on. For a project that will physically alter the landscape, restrict land use, and potentially affect property values for decades, this necessarily includes an understanding of what alternatives may exist and their relative implications.

Community members were never apprised of:

- the availability of undergrounding as a design alternative to overhead HVTL
- that the cost of undergrounding is the subject of active dispute, with independent estimates (e.g., Amplitude, 2023) suggesting costs as low as 1.5–2 times the overhead option, and that DC cable costs are trending downward while overhead costs are trending upward (AEMO Transmission Cost Database, 2025)
- that landholders under an undergrounding arrangement would receive substantially higher annual payments than those with overhead HVTL[2]
- that with undergrounding, visual amenity, stock access, and crop usage would not carry the same significant constraints as overhead HVTL

Valley Alliance drew this information to EnergyCo/Umwelt's attention. It was not relayed to the broader community.

At a Nundle community consultation on 4 November 2025, a community member specifically raised undergrounding with Mr Julian Watson, Deputy Project Director of the New England REZ. Mr Watson rejected the option, citing the 2023 NSW Upper House Inquiry as finding it "too challenging from a cost and delivery perspective." When asked whether EnergyCo had conducted a current cost comparison specific to this project, Mr Watson stated: "Have we done a full cost comparison of undergrounding to this [aboveground HVTL]? No." Asked whether one would be undertaken, he replied, "It's unlikely." When asked on what basis he could then assert that undergrounding would cost more, he replied: "Because undergrounding is considerably more expensive."

The data collection was not neutral research; it was specifically designed to elicit community views on a particular project design (overhead HVTL). For those views to be informed in any meaningful sense — and for the SIA to validly claim to represent "community views" — the community needed to know that a materially different design option (undergrounding) existed, with potentially superior cost-benefit, land-use, and amenity outcomes for landholders. It did not. Participants were therefore asked to form and express views in a

[2] Syncline Energy, as reported by ABC News (21 March 2025), offers landowners approximately $40,000 per year per kilometre for underground HVDC cable, with no stated time limit, in addition to a Community Trust stake in the project. Compare with the NSW SBP: $10,000/km/year for 20 years only.

contextually incomplete frame, and the data cannot be characterised as informed community input on the project. The IAIA Guidance requires "full disclosure by project developers of their plans" and that "each community has enough information and capacity to have a reasonable understanding of what those plans will likely mean for them, including of the social impacts they will experience" (2025: v, 17). Although this language appears in the FPIC section, the Guidance explicitly states that FPIC principles apply to "all communities (non-Indigenous as well as Indigenous)" and that it is "international best practice" to accord all communities the power to provide or withhold broad-based consent (2025: 17).

The SIA's reliance on data collected under these limitations, to characterise the nature and extent of community objection, is methodologically unsound. A community that does not know an alternative exists cannot give a "reasoned response" to the plan as presented.

Consequence:

Taken together, these five failures mean that the data collection for this SIA was conducted without a functioning informed consent framework. The SIA characterises its engagement as —providing opportunities for involvement throughout the assessment process (2026:22, 23). Opportunity to participate is not the same as informed consent. The SIA uses the language of 'involvement' as a substitute for the language of 'consent' — a lower ethical threshold that it does not meet. The IAIA Guidance (Principle 2, 2025: 32) makes clear that the test is not whether a signed consent form exists, but whether the practitioner can establish that the interview (or other form of community engagement) was conducted in the spirit of free, prior and informed consent; that the participants were fully informed about the data collection; and that the participants were aware of their rights in relation to their involvement in the research (2025: v,4). None of these conditions can be established here. The qualitative data is ethically tainted; its use as a basis for impact identification and significance rating is methodologically unsound.

3. Sampling Methodology: Bias, Response Rates and Unconsented Inclusion

Governing requirements:

- NSW SIA Guideline: "Collect qualitative and quantitative data, evidence and insights for scoping social impacts in ways that ensure both diversity and representativeness of views." (2026: 31)
- IAIA Guidance Ethical Principles 17, 18 (Appropriateness of Research Methodology; Full reporting of Methods): data collection methods must be appropriate to the research questions and methods used fully reported, including instruments, limitations should be transparently acknowledged (2025: 33,64).

- Basic principles of survey methodology: for statistical inference, the sample must be probability-based. Convenience and self-selected samples do not permit statistical inference or claims of representativeness.
- IAIA Guidance Principle 2 (Informed consent): participation requires "sufficient information and an adequate understanding of the SIA research and the consequences of their participation" (2025: 32).
- NHMRC National Statement Chapter 2.2: consent requires participants to be informed of "the purpose, methods, demands, risks and potential benefits of the research" (2025: 17).

3.1 Online surveys: selection bias and incomparability

What the SIA says (2026: Appendix F: 2):

> "Disadvantages of an online survey method relate largely to sampling bias, that is the method may exclude those without internet access or digital literacy… representativeness may also be a significant issue given that such survey methods rely on self selection (respondents are those who choose to respond) which can result in skewed survey samples."

What the SIA says (2026: p. 84):

> "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared."

What the SIA says (2026: Appendix F: 2):

"In completing the survey, respondents also referred to the development/proposed development of other renewable energy projects occurring both within and outside of the New England Renewable Energy Zone. While awareness of the current Project was top of mind for many respondents, other respondents may have been less able to differentiate between other renewable energy projects in their respective localities."

What the SIA says (2026: Appendix F: 2):

"Social impact assessment is grounded in the understanding that social impacts are experienced subjectively, and therefore must be interpreted through the perceptions of affected individuals and communities."

Critique:

The SIA acknowledges, in its own text, that the online survey produces "skewed survey samples," that the two datasets "cannot be merged or directly compared," and that respondents "may have been less able to differentiate" this project from other REZ projects. It then uses this data as a primary basis for characterising community views.

3.1.1 Self-selection bias is acknowledged but unaddressed

The SIA identifies the mitigation as "wide communication of the survey through diverse channels" (SIA 2026 Appendix F: 2). It does not report what channels were used, what the response rate was, or what proportion of the affected population was reached. The sample is representative of "those who chose to respond" — not the affected population.

3.1.2 The datasets cannot be compared — yet are presented together

The SIA presents findings from both surveys (and the CATI) as a unified summary of "community values" (e.g., Figure 4.1, 2026: 85). It admits that "the 2025 online survey reflected a relatively greater diversity of community values compared to the 2026 online survey. This is likely due to the differing data collection methods for the question" (2026: 84). If the datasets cannot be compared, the SIA cannot use them jointly to demonstrate trends, consistency, or the nature and extent of community attitudes.

The SIA's stated justification for combining the datasets — that 'the two rounds of engagement have ensured the SIA reflects both the evolving project design and current community and stakeholder perspectives' (2026: 22,23) — is refuted in Section 4.1 below.

3.1.3 Respondents may not have been commenting on this project

The SIA does not report what proportion of responses were attributable to this project versus others, and provides no mechanism for separating them. The data's validity as a measure of views on *this* project is compromised.

3.1.4 The SIA's own epistemological premise is not met

The SIA states that social impacts "must be interpreted through the perceptions of affected individuals and communities." If the sample is self-selected, cannot be merged across periods, and may include responses about other projects, the SIA does not have the perceptions of the affected community — it has the perceptions of a self-selected, potentially confused subset.

Consequence:

The online survey data cannot support the SIA's characterisation of community views. The SIA effectively acknowledges the data is unreliable, then uses it as though it is not.

3.2 CATI — "Quota" Sampling and Comparability

What the SIA says (2026: 25):

> "The CATI survey was implemented to obtain a representative sample from the broader community."

What the SIA says (2026:31):

> "The views of the community represented throughout the report are based on the sample of community members and stakeholders consulted as outlined in Section 2.5, and do not necessarily represent the views of the entire community."

What the SIA says about method (2026: Appendix E: 3):

"Working with quotas for each LGA and a data set of geocoded telephone numbers, researchers from the Taverner Research team will conduct calls with residents in the LGA. Researchers will undertake the survey with willing participants over the phone, reading the questions and recording their answers. Once an LGA quota is reached, no more residents in the given LGA will be contacted."

What the SIA says about the CATI's purpose (2026: Appendix E: 2):

"Based on this, the CATI survey seeks to:

- Compare outcomes from the CATI survey and the Online Community Survey. This would allow the SIA to differentiate outcomes between those directly affected by the Project and the broader community.
- The nature of a CATI survey will also enable the comparison between a random sample and an opt in methodology (the Community Survey)……
- It is expected that the CATI survey may capture more of the 'silent majority' who may be more neutral and moderate in their views and perceptions of the Project."

What the SIA says about statistical treatment (2026: Appendix E: 2–3):

"The survey will target 600 households within the LGA's hosting Project infrastructure and will ensure that appropriate confidence levels and intervals are determined…Confidence Interval (±3)….working with quotas for each LGA and a data set of geocoded telephone numbers…"

The sequence of events:

Event	Date (pertinent information)
2025 online survey	April–July 2025 (under the March 2024 alignment)
New 3 km corridor announced	2 October 2025
CATI conducted	March–April 2026 (3 km corridor known; 1 km not yet finalised)
1 km corridor announced	1 May 2026
2026 online survey	April–May 2026 (straddles the 1 km announcement)

The numbers: 11,446 calls; 600 interviews. Response rate: **5.2%**.

Critique:

The SIA simultaneously asserts and disclaims representativeness. Page 25: "representative sample." Page 31: "do not necessarily represent the views of the entire community."

Appendix E:2: "random sample." Three pages, three characterisations of the same dataset. The p. 31 disclaimer is a liability hedge; the p. 25 and Appendix E:2 claims are the assertions on which the findings rest. If the p. 31 disclaimer is correct, the other claims are false.

The stated purpose is not achievable by the method, and in part was logically impossible at the time of data collection:

- **"Differentiate outcomes between those directly affected and the broader community."** The CATI was conducted before the 1 km corridor was finalised. The instrument identifies "high impact areas" by **suburb only**, not by exact property or parcel. At the time of interview, it was not possible to identify whether a respondent was "directly affected by the Project" in the sense of being within the final corridor. The stated purpose was unachievable at the point of data collection. Post-hoc matching to the final corridor is not described in the SIA, and even if performed would not constitute a valid affected-community sample, because respondents were never selected on the basis of being affected.
- **"Comparison between a random sample and an opt-in methodology."** The CATI is not a random sample — it is a convenience sample (see below). Furthermore, identical questions were not asked across the CATI and the online surveys. A valid cross-method comparison requires the same constructs measured with the same (or validated equivalent) questions. The SIA is comparing different things measured two ways.
- **"Capture more of the 'silent majority.'"** At a 5.2% response rate, with "willing participants" as the inclusion criterion, the CATI is capturing the opposite of the silent majority. The 600 respondents are those who answered the phone, were available, and chose to engage. The "silent majority" is the 10,846 who did not respond.

The method fails at every stage of the sampling chain:

3.2.1 The frame does not support the inferences drawn from it

The frame — "residents in the LGA" — is appropriate for capturing the broader community as a comparison benchmark. But the SIA uses the data to differentiate affected from unaffected respondents, which the frame cannot do (suburb-level identification only). CATI data were attributed to the broader community even though 4% self-identified as project-affected landholders (2026: 27), without explanation of how this was methodologically handled. The SIA also compares CATI results with online survey results (targeting the affected community) despite non-identical questions. A general-community dataset with a different question set cannot be validly compared to an affected-community dataset.

3.2.2 "Willing participants" and the stop rule produce a convenience sample

There is no randomisation step described. "Once an LGA quota is reached, no more residents in the given LGA will be contacted" means the sample is determined entirely by call-list order and the willingness of early-called respondents. The 600 are the first 600 people who answered, were in the LGA being called, and were "willing." This is a convenience sample truncated at an arbitrary point, biased toward those who are at home, who answer unknown numbers, and who have time to complete a survey.

3.2.3 The sample size is arbitrary

600 is not derived from a power calculation, margin-of-error target, or confidence-level specification. Fragmented across 6 LGAs, it is insufficient for any sub-group analysis.

3.2.4 LGA quota allocation is not proportional

The allocation was by quota, not in proportion to population or corridor exposure. Some LGAs are over-represented; others under-represented, independent of actual exposure.

3.2.5 The 5.2% response rate makes non-response bias dominant

10,846 of 11,446 did not participate — below even the expected 10% for modern phone surveys. No information on non-respondent characteristics, no weighting adjustment, no sensitivity analysis. Only a "34% survey decline rate" is noted (2026: 25). Non-response bias is not a risk here; it is the dominant feature of the dataset.

3.2.6 Confidence intervals are methodologically invalid

Probability statistics cannot be applied to a non-probability sample. Any confidence intervals, margins of error, or population-level claims derived from the CATI data are invalid.

3.2.7 "Comparison" with the online surveys is not validation

Comparing non-probability samples with different question sets does not validate either. The claim that "social impact themes (positive and negative) that have emerged through the process… have been validated through triangulation of data sources and methods" (2026: 30) is not supported by the methodology used.

3.2.8 The 2025 online survey dataset is temporally contaminated

Some 2025 respondents were unaffected by the original alignment but became affected by the revised alignment (2 October 2025). The SIA acknowledges that "some questions and responses in the survey datasets cannot be merged or directly compared" (p. 84). Yet 2025 responses are included in the SIA's characterisation of community views on the current project, both in the cumulation of views and in comparisons with CATI data. Given that an unknown proportion of 2025 respondents may have materially changed their views following the alignment change, this is a category error—the 2025 data reflect views on a project configuration that no longer exists.

Consequence:

It is not possible to survey a population about a project whose final alignment has not yet been determined and then claim to have differentiated the affected from the unaffected. The CATI data is descriptive of the views of the first 600 willing respondents across 6 LGAs, interviewed before the final corridor was determined, using suburb-level identifiers, with questions that do not precisely match the online survey instruments. This is not "a representative sample from the broader community," not a "random sample," and not a valid benchmark for comparison with data from the affected community.

3.3 Group consultations — unconsented data collection

In various group consultations and community information sessions, participants were unaware that data was being collected for the SIA. This is a direct breach of:

- NHMRC National Statement (general requirements for consent) (2025: 17–19)
- IAIA Ethical Principle 2 (informed consent) (2025: 32)
- IAIA Ethical Principle 3 (specific permission for recording) (2025: 32)
- IAIA Ethical Principle 9 (no use of deception) (2025: 32)

By way of specific example: Valley Alliance committee members can give direct evidence of photographic recording of participants at community information sessions, without permission. Umwelt practitioners attended CRG meetings without expressly detailing their intended data collection, explaining the legal/ethical constraints, or requesting consent. In community information sessions, semi-structured interviews, and other SIA engagement mechanisms, participants were not generally advised that data collection was occurring or of the legal/ethical requirements incumbent on the researchers in relation to free, prior and informed consent to participation .

This constitutes unconsented data collection. The data is ethically tainted and methodologically unsound.

Combined consequence (Section 3):

The three data collection methods fail on both ethical and methodological grounds, and the failures compound.

Ethically, the data collection was conducted without a functioning informed consent framework. The qualitative data cannot be characterised as informed community input.

Methodologically, none of the three surveys produces a sample from which valid statistical inference can be drawn. The SIA's quantitative findings — response rates, percentages,

confidence intervals, and population-level claims as applied to the CATI data — are methodologically invalid. The SIA's quantitative findings are unreliable; its qualitative findings are ethically unsound. The proponent has no valid primary data on which to make statements regarding community-level impact or to develop targeted mitigation strategies.

4. Data Inclusions and Exclusions

Governing requirements:

- NSW SIA Guideline: “The SIA assesses social impacts within the social locality which is defined by where people are likely to experience those impacts” (2026: 16). Data must be relevant to the defined social locality and the details of the project. “Primary data should be grounded in people’s reports of their actual experiences, views, and perceptions, and informed by details of the project” (2026: 19,20).
- NSW SIA Guideline (Transparent principle): "Explains, justifies and makes available information, methods and assumptions so that people can see how their input has been considered." (2026: 8)
- Basic research integrity: data must be relevant to the research question. Including data from outside the study area, or excluding data from within it, without justification, undermines the validity of the assessment.
- Basic research integrity: survey instruments must be made available to enable independent verification of comparability claims.

4.1 Inclusion of data from areas no longer affected by changed HVTL corridor

The HVTL corridor was moved during the project's development (2 October 2025), removing it from one area and placing it through another (with a smaller, more immediately affected population). Despite this change, a significant volume of data collected from the previously-affected area is included in the SIA.

Specifically, the SIA states that households in Walcha — not affected by the then-current alignment — participated in the 2025 online survey (2026: Appendix F: 3). Their 2025 data is included in the SIA's characterisation of community views. However, it is not valid to include their 2025 data as a measure of views on the *current* project, because:

- Their exposure to the project has materially changed (they were unaffected under the 2024 alignment; they may be affected under the revised alignment, or vice versa).
- Their views, expressed in 2025, were formed in a different project context and cannot be assumed to reflect their views on the current alignment.

Similarly, data from households around the original alignment may have materially changed their views when they were no longer affected. Their 2025 responses reflect a project that no longer exists in the form they described.

The SIA does not address this. It does not:

- Identify which respondents are in the current corridor versus the old corridor
- Report whether views changed between the two alignments
- Explain why data from no-longer-affected respondents is included
- Separate the two datasets in the analysis

The consequence is a dilution effect. Adding data from a larger, no-longer-affected population inflates the sample size and can reduce the intensity of reported impacts. If the no-longer-affected population reported lower distress or lower opposition, including them lowers the average and makes the project appear less impactful than it is on the actually-affected population. Conversely, if the old-corridor population reported high opposition, including them inflates the apparent level of community objection to the current alignment.

The SIA attempts to justify the inclusion of data from both alignment periods:

> "The two rounds of engagement has ensured that the SIA is reflective of both the evolving project design and current community and stakeholder perspectives, whilst

> also providing opportunity for involvement throughout the assessment process." (2026:22)
>
> "All inputs received across the two rounds of engagement were considered in the assessment. The two rounds of engagement have ensured the SIA reflects both the evolving project design and current community and stakeholder perspectives, whilst also providing opportunities for involvement throughout the assessment process." (2026:23)

This justification is unsound for three reasons:

First, "reflective of the evolving project design" is not the same as "reflective of current community perspectives on the current design." A respondent who completed the 2025 survey under the original alignment expressed views on a project configuration that no longer exists. Their 2025 response is not a view on the *current* design; it is a view on a *previous* design. Including it as evidence of "current community perspectives" conflates the two.

Second, the SIA's own admission on p. 84 — that "some questions and responses in the survey datasets cannot be merged or directly compared" — directly contradicts the p. 22/23 claim that the two rounds "ensured the SIA reflects both the evolving project design and current community perspectives." If the datasets cannot be merged, the SIA cannot claim that the combined result "reflects" a single, coherent picture of community views on the current project.

Third, "providing opportunity for involvement throughout the assessment process" is a statement about *access*, not about *data validity*. The fact that community members had the opportunity to engage in two rounds does not cure the methodological problem that the first round's data was collected under a different project configuration. Opportunity to participate is not the same as the data being fit for purpose.

An accurate baseline was available. The ABS collects population data to mesh block level. The consultants could have requested the ABS to identify the exact number of people affected within a defined radius of the finalised HVTL, giving an accurate baseline population against which to measure response rates and characterise the affected community. This was not done.

This is a material methodological failure.

4.2 One response per household in the CATI

The CATI was limited to one response per household. This is a significant methodological limitation for a project that is, by its own admission, divisive within households. Different members of the same household may have different landholdings, different proximity to the corridor, different economic dependencies on the affected land, and genuinely different views.

By restricting the CATI to one respondent per household, the SIA:

- Suppresses intra-household diversity of views
- Cannot identify or report the range of perspectives within affected households
- Potentially under-represents the views of household members who were not selected
- Cannot assess whether the project is creating intra-household conflict — which is itself a social impact

The NSW SIA Guideline requires data collection that "ensures both diversity and representativeness of views" (2026: 31). A one-response-per-household design is inconsistent with this requirement for a project with the social complexity of a >200 km HVTL across rural communities.

4.3 The SIA's contradictory positions on data comparability

The SIA takes three mutually inconsistent positions on whether its three datasets (2025 online survey, 2026 online survey, CATI) can be compared:

Position 1 — They cannot be compared (2026: 84):

> "Importantly, due to the changes in project alignment which were announced between the two online survey periods, some questions and responses in the survey datasets cannot be merged or directly compared."

Position 2 — They can be compared (2026: Appendix E: 1):

"The CATI survey has been developed so that key questions can be compared to the outcomes of the Online Community Survey (2025 and 2026)."

Position 3 — Comparison is limited (2026: 89):

"Due to differences in question structure between the CATI survey/2026 online survey and 2025 online survey, direct comparison of results is limited."

These three positions cannot all be true. If the datasets "cannot be merged or directly compared" (Position 1), they cannot also be designed "so that key questions can be

compared" (Position 2). If "direct comparison of results is limited" (Position 3), the extent and nature of that limitation must be specified.

Yet the SIA proceeds to compare and merge all three datasets throughout Chapter 4, for example:

- Figure 4.1 (p.85) combines data from all three datasets in a single figure
- Pages 86–87 compare attitudes to renewable energy across the datasets
- Page 87 compares attitudes to the project across the datasets
- Figure 4.3 (p.88) compares the 2026 online survey with the CATI for overall attitude to New England REZ network infrastructure project
- Figure 4.5 (p.90) compares the 2026 online survey with CATI data for negative impacts of the project

The SIA acknowledges on p.89 that "direct comparison of results is limited" — and then does it anyway in Figures 4.5 and 4.6, without specifying which questions are comparable, which are not, or on what basis the comparison is valid.

No detailed table comparing the questions across the three instruments is provided. The reader cannot verify which questions are identical, which are different, or which comparisons in Chapter 4 are methodologically valid. The SIA's own admission that "differences in question structure" limit comparison (p.89) is not operationalised: there is no mapping of which specific questions can and cannot be compared, and no explanation of how the SIA determined that the comparisons in Figures 4.1, 4.5, and 4.6 etc. are valid despite those differences.

4.4 The online survey instruments are not included in the SIA

The CATI survey instrument is included in the SIA as Appendix E. The 2025 and 2026 online survey instruments are not included.

This is a transparency failure. Without the instruments, it is impossible for a reader, assessor, or independent reviewer to:

- Verify which questions are identical across the three datasets
- Assess the SIA's claim that "key questions can be compared" (Appendix E: 1)
- Determine the extent of the "differences in question structure" the SIA acknowledges (p. 89)
- Evaluate whether the comparisons in Chapter 4 are valid

A Valley Alliance community member obtained a copy of the 2025 online survey (questions 17–34) and notes that it appears substantially different from the CATI instrument. However, a full comparison cannot be made because the SIA does not provide the online survey instruments for independent verification.

The NSW SIA Guideline's transparency principle requires that "information, methods and assumptions" be made available "so that people can see how their input has been considered" (2026:8). The survey instruments are part of the method. Their absence from the SIA prevents any independent verification of the comparability claims on which Chapter 4's findings rest.

4.5 Figure 4.6 introduces categories not captured by the CATI instrument

SIA Figure 4.6 (p.91) reports negative impacts of the project from CATI data, comparing three categories: "project affected landholders," "proximal landholders," and "the broader community."

The CATI survey instrument (Appendix E) does not appear to include a specific question aimed at determining which of these categories a respondent falls into. The instrument identifies "high impact areas" by suburb only (as noted in Section 3.2 above), and the CATI was conducted before the final corridor was determined. It is not explained in the SIA how respondents were classified into these three categories, what criteria were used, or whether the classification was made at the point of data collection or applied post-hoc.

If the classification was applied post-hoc (i.e., after the final corridor was known), the SIA must describe the method, the spatial data used, and the limitations of matching suburb-level identifiers to a finalised corridor. If it was not applied post-hoc, the categories in Figure 4.6 are not supported by the data collected.

4.6 The 532-to-90 response drop is unexplained

The 2025 online survey received 532 responses; the 2026 online survey received 90 responses (2026: 26). This is an 83% decline in responses between the two survey periods.

The SIA attributes the difference in "diversity of community values" between the two surveys to "differing data collection methods for the question" (2026: 84). It does not address the response volume difference. A drop from 532 to 90 is not a minor fluctuation; it is a near-total collapse in participation. The SIA does not:

- Explain why the 2026 survey received so few responses
- Assess whether the 90 respondents are a meaningful sample of the affected population

- Address whether the 2026 survey's findings can be generalised to the affected community

The SIA presents both datasets as equally valid inputs to Chapter 4's analysis. A dataset with 90 responses from an opt-in survey cannot carry the same evidentiary weight as one with 532, and the SIA does not acknowledge or adjust for this disparity.

Consequence:

The SIA's treatment of its own data is characterised by a pattern: it acknowledges limitations, then proceeds to use the data as though the limitations do not exist. The datasets "cannot be merged or directly compared" (p.84) — yet are merged in Figure 4.1. "Direct comparison of results is limited" (p.89) — yet Figures 4.5 and 4.6 compare them. The online survey instruments are not provided — yet comparability is claimed (Appendix E:1). Data from no-longer-affected areas is included without explanation. Categories are reported in Figure 4.6 that the CATI instrument does not appear to capture.

5. Failure to Use the Kessler-10 (K10)

Governing requirement:

- The SIA reports on distress as a social impact of the project (2026: 117,176,179, Appendix F Survey Results: 33)
- The Kessler Psychological Distress Scale-10 (K10) is the standardised, validated, and widely used instrument for measuring non-specific psychological distress in population surveys. It is:
    - Used in the Australian National Health Survey (ABS) as the standard measure of psychological distress
    - Validated for the Australian population (Kessler & Mroczek, 1992; Australian norms available from ABS)
    - Free to use in research (no licensing required)
    - Administered in approximately 5 minutes
    - Available in 27+ languages
    - The de facto standard in Australian population health and social research for measuring distress

Critique:

The SIA reports on distress at multiple points (2026:117, 176, 179) and cites the National Rural Health Alliance (2021) *Mental Health in Rural and Remote Australia* in support of the proposition that rural communities experience elevated psychological distress higher than

that which is self-reported (SIA 2026:179). Yet the SIA does not use the K10 — the standardised instrument that underpins the very data the NRHA fact sheet reports — to measure distress in the affected population. The citation identifies the problem; the methodology fails to address it. Distress is a specific, measurable construct — but rather than using the K10, or any other standardised instrument, distress is apparently captured through unstandardised, open-ended, or ad-hoc questions (or through qualitative reporting only).

This is a material methodological failure for the following reasons:

1. **No validity.** Without a validated instrument, the SIA cannot demonstrate that it is measuring "distress" in a consistent, reliable, or comparable way. The construct is undefined and inoperable.
2. **No reliability.** Without a standardised instrument, the measurement is not replicable. Another researcher could not reproduce the SIA's distress findings using the same method.
3. **No comparability.** Without the K10 (or equivalent), the SIA's distress findings cannot be compared to:
    - Australian population norms (ABS National Health Survey)
    - Other infrastructure project SIAs
    - Clinical thresholds (the K10 has established cut-offs for mild, moderate, high, and very high distress)
    - Pre- and post-construction baselines
4. **No sensitivity.** Ad-hoc questions are less sensitive to changes in distress than a validated scale. The SIA may be under-detecting the true level of distress in the affected population.
5. **The instrument was available and recommended.** The K10 is free, publicly available, and was specifically recommended to the SIA team by a community member with social research experience more than a year before the EIS was finalised. The SIA team's failure to adopt this recommendation — without documented justification — is not merely a methodological oversight; it is a failure to respond to reasonable, expert input during the assessment process.

Consequence: The SIA's findings on distress are methodologically unsound. They cannot be validated, replicated, or compared to established norms.

Requested Remedial Actions

1. Require independent ethical review of the SIA's data collection methodology by an HREC or equivalent body (independent of the consultant and EnergyCo), with a written determination on whether the research met the requirements of the NHMRC National Statement.
2. Require the SIA to re-characterise all quantitative findings as descriptive (non-probability) data, with explicit statements that no statistical inference (confidence intervals, margins of error, population-level generalisations) can be drawn from the online survey or CATI data.
3. Require the SIA to exclude all data collected from areas no longer affected by the moved HVTL corridor, or to present it in a clearly separate section with a documented justification for its inclusion.
4. Require the SIA to re-collect psychological distress data using the K10 (or an equivalent validated, standardised instrument) and re-report the findings with comparison to Australian population norms.
5. Require the SIA to document the informed consent process in full, including: what information was provided to participants, what was not provided, and how the proponent/consultant determined that consent was "informed." Provide evidence of the specific and verifiable delivery of the “Participant Ethics Information Sheet” at all stakeholder engagements.
6. Require the SIA to provide the 2025 and 2026 online survey instruments in the appendices, and a detailed table mapping which questions are identical across instruments and which comparisons in Chapter 4 are therefore valid.
7. Require the SIA to explain how respondents were classified into the categories in Figure 4.6, and to address the 532-to-90 response drop and its implications for the validity of the 2026 survey findings.
8. Require a Social Impact Management Plan that includes a post-construction social impact monitoring programme using the K10 at 2 and 5 years post-construction, with results reported to DPHI.

References

Amplitude Consultants, *HumeLink Undergrounding – Review of Transgrid Report and Costing of HVDC Alternatives*, Rev 3, 3 October 2023.

AEMO, *Transmission Cost Database Update*, May 2025.

Kessler, R.C. & Mroczek, D.F. (1992). Measuring overall psychological distress: The General Health Depression (GHQ-12). *Psychological Medicine*, 22(2), 483–490.

National Rural Health Alliance, *Mental Health in Rural and Remote Australia*, 2021.

NHMRC, *National Statement on Ethical Conduct in Human Research*, 2025 (updated from 2007).

IAIA, *Social Impact Assessment: Guidance for Assessing and Managing the Social Impacts of Projects*, 2025.

NSW Department of Planning, Housing and Infrastructure, *Social Impact Assessment Guideline*, 2026.

Appendix 1

Author Biography

Dr. Merryl Uebel-Yan (retired)

Roles at AIHW: Senior analyst · Data collection manager · Author · Peer reviewer · Professional adviser on academic research

Key publications:

- Co-author, *Australia's health* and *Australia's welfare* — the AIHW's flagship national publications
- Author of reports on functioning and disability, adoptions, child protection, and Indigenous people with disability

Other AIHW work:

- Review and development of Cultural and Linguistic Diversity measures in aged care
- Ad hoc government-funded research projects

Pre-AIHW:

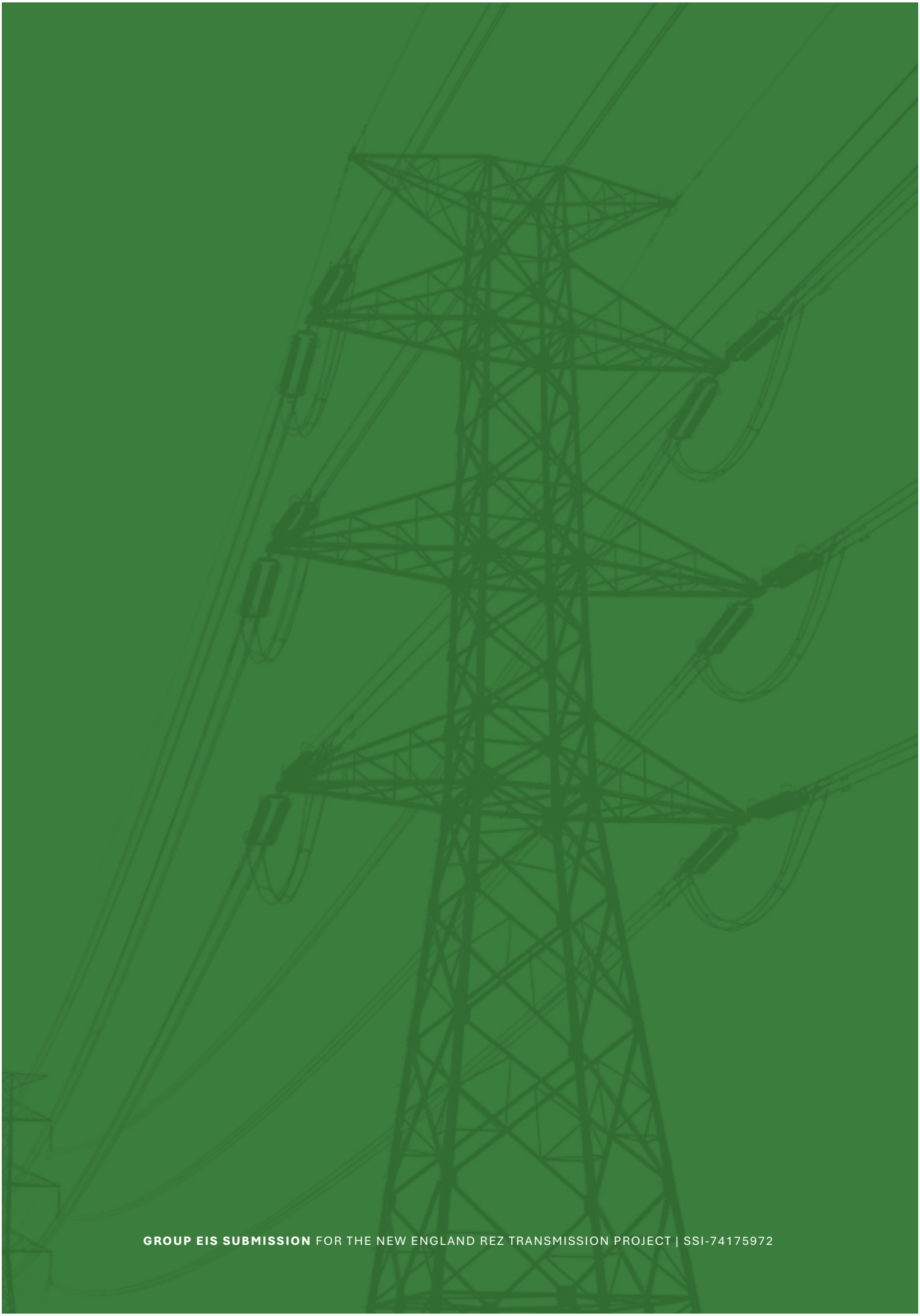
- Contract research for the NSW component of the database underpinning the Health Direct helpline
- Early career in law enforcement as a researcher and analyst — the former National Crime Authority, the Stewart Royal Commission, and the AFP (performance monitoring),

Qualifications: PhD in Information Science

SECTION 18

Workforce Camps Hubs and Laydown Areas

WALCHA HIGH COUNTRY GUARDIANS | Rouchel Brook ACTION GROUP | PROTECT THE VALLEY UPPER HUNTER RESPONSIBLE INFRASTRUCTURE GROUP | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION **18**

Workforce Camps, Hubs and Laydown Areas

Key issues we have found ...

Unassessed camps need public scrutiny

Barry camp and the alternative Muswellbrook site require completed assessments and public exhibition, so neighbours can scrutinise impacts before approval.

Industrial sites lack fixed locations

Batching plants, crushing operations and helipads lack fixed locations, leaving neighbours unable to assess noise, dust, traffic and local impacts.

Essential camp services remain unsecured

Water, wastewater disposal, power and emergency services lack confirmed arrangements, despite camps being proposed within small communities with limited capacity.

Neighbours face unresolved noise impacts

Hub noise barriers remain uncommitted; camp noise predictions exceed screening levels for sleep disturbance, requiring confirmed layouts and binding mitigation.

Farmland acquisitions need proper justification

Large acquisition areas lack defined built footprints and adequate farm assessments, leaving the need and future land use poorly explained.

Temporary sites need guaranteed restoration

Camps and laydowns need binding removal deadlines, agreed rehabilitation standards and financial security so temporary occupation leaves no lasting liability.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >





> Images show Central West REZ Workers Camp and Hub

SECTION **18**

Workforce Camps, Energy Hubs and Laydowns

EXECUTIVE SUMMARY

The EIS does not meet the Planning Secretary's Environmental Assessment Requirements (SEARs) for the workforce camps, energy hubs and ancillary sites. The SEARs make these sites part of the project, yet one 320-bed camp (Camp 3 at Barry) has not been located or assessed, a second camp has an unassessed alternative site, and batching plants, crushing plants and helipads can be placed anywhere in the 10,928 ha project area after approval.

Because the exhibited EIS does not describe the project for which approval is sought, it must be revised and re-exhibited once every camp and ancillary site has been located and assessed. A later report that the public cannot comment on is not an adequate substitute.

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SEARs requirements not met

The SEARs expressly include workforce accommodation camps, laydown and staging areas, crushing and screening plants, concrete batching plants and helicopter landing pads as part of the project (SEARs, Project description, p. 1). The EIS does not meet the following requirements for them:

Page references: main EIS pages are PDF pages of EIS-02 (printed page = PDF page − 35); technical report pages are PDF pages of that report; CWO Submissions Report pages are printed pages (PDF page = printed + 31).

SEARs requirement	What the SEARs say	What the EIS does
General Requirements: project description	'a full description of the project, accompanied by suitable maps and plans, including the... disturbance area; physical layout of the project'	Camp 3 and Camp 1 Alternate are not located or assessed (EIS-02 PDF p. 146); no camp has a fixed position in its land (TR09 p. 64); batching, crushing plants and helipads may go 'anywhere within the project area' (PDF pp. 171–172)
Biodiversity	The BDAR must 'assess the impacts associated with all ancillary infrastructure'	Camp 3 and Camp 1 Alternate are not in the BDAR; unlocated ancillary sites are assessed only where the project area was surveyed (54 per cent)
Water and Soils	'details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation (including consultation with suppliers)'	No potable source confirmed for about 2,060 camp places; wastewater to an unnamed 'licenced wastewater facility'; no supplier confirmation (PDF pp. 101, 173)
Waste	'identify, quantify and classify the likely waste streams... (in consultation with waste facilities, including Councils)'	Camp domestic waste and sewage sludge not quantified; no receiving facility or council agreement named (PDF pp. 796–810)
General Requirements: consistency	'consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed'	Three laydowns assessed in the technical reports (Barry Road; two Camp 2 laydowns) do not appear in the acquisition table, Table 3.5, and no other row is said to include them (TR14 pp. 59, 69; PDF p. 138); the Albano Road laydown is placed 'north-east of Muswellbrook' in Table 3.5 but at Rouchel Brook in the technical reports; hub land is 1,185 ha in the text and 1,190 ha in the table (PDF pp. 537, 138); the traffic report routes Camp 2 traffic through Gundy while the noise report adds almost none to Gundy Road (TR07 p. 119; TR09 p. 165)

> Table ES1 - **SEARs requirements not met for camps, hubs and ancillary sites**

Noise (the ICNG construction assessment), bushfire (emergency egress and evacuation) and social impact (community infrastructure and services) are also only partly addressed: Camp 3 has no noise or evacuation assessment, and hub operational noise compliance depends on uncommitted barriers.

Severe deficiencies

- **An unassessed 320-bed camp.** Camp 3 'has not been assessed in detail as part of this EIS' (EIS-02 PDF p. 146); its assessment is deferred to an Amendment Report (a preferred infrastructure report under EP&A Act s 5.17) that the Planning Secretary may, but need not, exhibit; the Department's guidance

says that 'in most cases, the PIR is not exhibited'. Its neighbours, traffic, water, wastewater, bushfire, biodiversity and heritage impacts would be decided without public comment.

- **No camp has a fixed site.** 'Specific camp locations have not yet been determined' for any of the five camps (TR09 p. 64), so distances to dwellings, drainage paths and helipad positions are unknown.
- **Unexplained farmland acquisition.** Camp 2 is a 780 ha full acquisition for about 320 workers, and the Timor Crawney Road laydown is 165 ha (Table 3.5, PDF p. 138), with no description of the land and no agricultural, equine, visual or social assessment of the sites.
- **Industrial sites without locations.** Batching, crushing and screening plants, helipads and 'high volume laydown' are left to a 'location assessment protocol' with no fixed criteria and no sign-off outside EnergyCo and its contractor (PDF pp. 171–172).
- **Hub noise compliance on uncommitted design.** Operational noise meets criteria only with 'indicative four metre high noise barriers' that no measure commits to (TR09 pp. 10, 93); auxiliary power lines to hubs and camps 'have not been assessed as part of this EIS' (PDF p. 118).
- **Below EnergyCo's own precedent.** At Central-West Orana two years ago, the same proponent named, sited and assessed its camps and compounds, and DPHI conditioned them on that basis.

We ask that the EIS be revised and re-exhibited once Camp 3 and every other camp and ancillary site has been located and assessed, that approval be confined to sites so assessed, and that the camps be conditioned at least to the standard EnergyCo accepted at Central-West Orana.

Deficiencies

The EIS does not presently demonstrate that the camps, hubs and ancillary sites are described with the precision required by the SEARs General Requirements (project description) and s 192(1)(d) of the EP&A Regulation 2021, or that their impacts have been assessed.

In particular, the EIS does not adequately resolve:

- the location of Camp 3 at Barry and of Camp 1 Alternate, neither of which is assessed (EIS-02 PDF pp. 102, 146). Without them, the exhibited EIS does not describe the project for which approval is sought, and it must be re-exhibited once they are assessed;
- the position of any camp within its acquired land, so distances to dwellings, drainage paths and helipad locations are unknown (TR09 p. 64);
- why 780 ha is acquired for a 320-bed camp, and 165 ha and 210 ha for two laydowns, and what happens to that farmland (PDF p. 138);
- the sources of potable water, the destination of effluent, sludge and waste, and the power supply routes for about 2,060 camp places (PDF pp. 101, 118, 173);
- health and emergency service arrangements for camps in localities the SIA finds have 'very low or no existing service provision capacity' (TR04 p. 164);
- hub operational noise without uncommitted 4 m barriers, and the hubs' generator connections and auxiliary lines (TR09 pp. 10, 93; PDF pp. 117–118);
- the location of batching plants, crushing and screening plants, helipads and 'high volume laydown', which may be placed 'anywhere within the project area' (PDF pp. 171–172); and
- decommissioning dates, rehabilitation standards and security for camps and laydowns (PDF pp. 147, 172).

1 | Workforce accommodation camps

1.1 Evidence

The EIS proposes five camps accommodating 'around 320 workers' each at Camps 1 to 3 and 'around 550 workers' each at Camps 4 and 5 (PDF p. 146), a combined capacity of about 2,060, against a peak workforce of 'around 1,400' on site at any one time (PDF pp. 102, 143). The camps operate 24 hours a day for about six years (PDF p. 142). Each has a helipad, laydown, wastewater treatment plant, diesel generators and on-site health practitioners (PDF p. 147). Enabling crews of about 40 per camp are first housed in local short-term accommodation for six months (TR04 p. 162).

Camp	Location (EIS)	Beds / land	Nearest dwelling	Status in the EIS	Pages
Camp 1	Inglewood Road, Muswellbrook (Muscle Creek)	~320 / 300 ha full acquisition	785 m	Assessed; may be replaced by Camp 1 Alternate	PDF pp. 102, 138, 145–146; TR09 p. 60; TR07 p. 119
Camp 1 Alternate	New England Highway, Muswellbrook, identified with Muswellbrook Shire Council	~320 / not stated	Not stated	Assessment 'will also be undertaken following exhibition of the EIS and included in an Amendment Report'	PDF p. 146; TR09 p. 21
Camp 2	Waverley Road, ~21 km NE of Gundy; Calfshed Gully catchment; access via Gundy Road	~320 / 780 ha full acquisition	581 m; 1 highly noise affected receiver during camp and ancillary site construction (TR09 p. 63)	Assessed at project-area scale; placement within the 780 ha undetermined	PDF pp. 138, 146; TR07 pp. 92, 119; TR09 pp. 60, 63; TR14 p. 59
Camp 3	'Barry Road, Barry' (Table 3.1); 'only recently been identified', option found May 2026 (p. 146)	~320 / not stated; not in Table 3.5	'Location not currently known'	'has not been assessed in detail as part of this EIS'; to Amendment Report	PDF pp. 102, 146; TR09 pp. 21, 60, 64–65; TR07 p. 92; TR12 p. 65
Camp 4	Central South Hub, Oxley Highway, Walcha Road; within hub footprint	~550 / within hub acquisition (300 ha)	275 m	Assessed at project-area scale	PDF pp. 102, 138, 146; TR09 p. 60; TR14 pp. 59, 99
Camp 5	Central Hub A, Glenburnie Road, Kentucky; within hub footprint	~550 / within hub acquisition (335 ha)	600 m	Assessed at project-area scale	PDF pp. 102, 138, 146; TR09 p. 60; TR14 p. 59

> Table 1 - **Workforce accommodation camps as described in the EIS**

How each technical report dealt with the camps, hubs and laydowns is set out in Appendix A.

1.2 EIS shortcoming

Camp 3 is approved in principle without an assessment.

The EIS fixes 'Camp 3 – Barry Road, Barry' in Table 3.1 (PDF p. 102) and admits that it 'has not been assessed in detail as part of this EIS' (PDF p. 146). The technical reports either omit it or assume it: 'location not currently known' (TR09 p. 21); 'access is assumed to be via Barry Road' (TR07 p. 92); an APZ range table because the 'location is not yet determined' (TR12 p. 65); no social baseline; not in the BDAR. A Submissions or Amendment Report is exhibited only if the Department chooses, so the community's only guaranteed opportunity to comment on a 320-bed camp is now, and there is nothing to comment on.

The EIS itself says the Camp 3 assessment will be 'included in an Amendment Report' after exhibition (PDF p. 146). Under s 5.17(6)–(7) of the EP&A Act the Planning Secretary may require a response to submissions and a preferred infrastructure report (the document the EIS calls an Amendment Report), and may, but need not, exhibit it. The Department's own guidance states that 'in most cases, the PIR is not exhibited' (DPHI, SSI Guide Appendix E – Preparing a Preferred Infrastructure Report, s 1.3). The camp's site, neighbours, traffic, water, wastewater, bushfire, biodiversity and heritage impacts would therefore be decided without any public comment. That is why the EIS must be revised and re-exhibited, not supplemented, once Camp 3 is located and assessed.

Camp 1 Alternate is a second unassessed camp.

A 'recently identified potential alternative location' on the New England Highway (PDF pp. 102, 145–146) has noise distance tables (TR09 Tables 35–36) but no traffic, flooding, biodiversity or social assessment.

No camp has a fixed position inside its land.

'At this stage of the project specific camp locations have not yet been determined and the assessment assumes that noise sources… are located at the closest extent of the project area to each receiver location' (TR09 p. 64). Camp 2's land is 780 ha, so the assessment cannot say which dwellings will be 581 m or 2 km from the camp, which gullies take the wastewater, or where the helipad goes.

780 hectares for 320 workers is unexplained.

Camp 2 is a 780 ha full acquisition and Camp 1 is 300 ha (PDF p. 138). The acquisition footnote says these areas 'should not be equated to the size of the infrastructure'. The EIS does not say what the balance of the land is for, what it is used for now, or what happens to it after construction.

Bed numbers, housing and the smallest towns.

The SIA's conclusion that housing impacts will be 'minimal' rests on 'the project's existing workforce accommodation camp strategy' (TR04 p. 160), while conceding that 'their effectiveness will depend on workforce composition, camp occupancy rates and the extent to which non-resident workers access local accommodation' (TR04 p. 163). Camp 2's 40-person enabling crew would take 71.4 per cent of the 56 short-term rooms within an hour's drive; Camp 3's would take 31.4 per cent of Nundle and Hanging Rock's rooms (TR04 p. 162).

Services for about 2,060 camp places are a list of possibilities.

Potable water of 340 ML is to be 'sourced from existing water supplies or purchased via vendor' (PDF p. 101); 'EnergyCo has engaged with councils, AGL and WaterNSW' (PDF p. 173). Wastewater is to be 'disposed of at a licenced wastewater facility' (PDF p. 101), with no facility named. Power is from grid connections whose routes 'have not been assessed as part of this EIS' (PDF p. 118) or diesel generators. Waste goes to unnamed landfills. Construction water supply and the Camp 2 (Waverley Road) water case study are dealt with in Section 8 (Water); this section relies on that analysis and does not repeat it.

Health and emergency services are absent.

The SIA finds Barry, Kentucky and Walcha Road have 'very low or no existing service provision capacity', and that 85.4 per cent of suburbs crossed have no ambulance station or hospital (TR04 p. 164). The answer offered is on-site practitioners and telehealth (TR04 p. 165).

Camps are built as enabling works before management plans exist.

Camp site establishment is enabling work that 'does not include activities that trigger the requirement for implementation of the CEMP or other specialist environmental management plans' (PDF pp. 144–145).

Night noise, traffic and decommissioning.

Six receivers exceed the sleep disturbance screening level from 24/7 camp operation, Camp 2 the worst (TR09 pp. 63–64); the mitigation is 'judicious placement… within the project area', which no measure secures. Camp 2 traffic runs 'New England Highway → Gundy Road → Waverley Road' through Gundy (TR07 p. 119), yet the noise report adds almost no traffic to Gundy Road (TR09 p. 165). Camp 3 traffic runs through Nundle on Barry Road, shared with Hills of Gold construction (TR07 pp. 119, 151). Camps 'would be removed on completion of construction' (PDF p. 147), with no timeframe, standard or bond; councils' requests for legacy housing are 'outside the scope of the project' (TR04 p. 160).

1.3 Consequences

Unless the EIS is re-exhibited, the decision-maker would approve camps whose location, footprint, servicing and neighbours were never put to the public. The standard condition DPHI uses (camps built 'as described in the EIS') cannot attach to a camp the EIS does not describe. The SIA's housing conclusion stands on camps that are not secured, so the residual social impact on Scone, Aberdeen, Murrurundi, Nundle and Hanging Rock is unassessed.

> POSITION SOUGHT

1. Once Camp 3 and Camp 1 Alternate are located and assessed, the EIS must be revised and re-exhibited for public comment before determination. An Amendment Report or Submissions Report that the public cannot comment on is not an adequate substitute.
2. If they are not re-exhibited, the approval must exclude Camp 3 and Camp 1 Alternate, and any later camp must be a modification under s 5.25 with public exhibition.
3. For each camp, EnergyCo should provide the footprint within the acquired land, the nearest dwellings to that footprint, and night-time noise, lighting and traffic at those dwellings.
4. EnergyCo should explain each acquisition (780 ha, 300 ha), the current farm enterprise on the land, and its use during and after construction.
5. EnergyCo should provide written confirmation from the receiving council or utility for water, effluent, sludge and waste for each camp, and the assessed power supply route.
6. EnergyCo should state what share of the workforce is assumed to live in camps and test the housing impact if occupancy is 60 per cent or a camp is six months late.

2 | Energy hubs and permanent facilities

2.1 Evidence

Facility	Location	What it is	Land	Nearest dwelling	Pages
North Hub	Romani Road, Boorolong	330 kV switching station, sized not to preclude 500 kV; equipment to ~28 m; harmonic filters (4 m barrier assumed)	210 ha partial	160 m	PDF pp. 113–114, 138; TR09 pp. 10, 60
Central Hub A	Glenburnie Road, Kentucky	500/330 kV substation; 3 × 1,500 MVA transformers; 2 synchronous condensers; equipment to ~38 m; hosts Camp 5	335 ha partial	590 m	PDF pp. 114–115, 138; TR09 pp. 10, 60
Central Hub B	Thunderbolts Way, Uralla	500/330 kV substation; 4 × 1,500 MVA transformers; 1 synchronous condenser	310 ha full/partial	400 m	PDF pp. 115, 138; TR09 p. 60
East Hub	Hillview Road, Salisbury Plains	330 kV switching station; equipment to ~28 m	35 ha partial	1,780 m	PDF pp. 115–116, 138; TR09 p. 60
Central South Hub	Oxley Highway, Walcha Road	500/330 kV substation; 3 × 1,500 MVA transformers; hosts Camp 4	300 ha partial	1,130 m	PDF pp. 116–117, 138; TR09 p. 60
Nemingha maintenance facility	Nemingha, Tamworth	Permanent operations base	1.5 ha full	<10 m; 4 highly noise affected receivers	PDF pp. 100, 138; TR09 pp. 60, 63
Bayswater substation extension	Bayswater Power Station	500/330 kV extension	7.5 ha partial	2,700 m	PDF pp. 100, 138; TR09 p. 60

> Table 2 - **Energy hubs and permanent facilities**

Hub acquisition is 'approximately 1,185 hectares' in the land use chapter (PDF p. 537), while the five hub rows in Table 3.4 sum to 1,190 ha; the table total of 1,199 ha adds the Nemingha facility and the Bayswater extension (PDF p. 138).

2.2 EIS shortcoming

The hubs are described as equipment lists, not as sites.

'The final number and configuration of hub components would be confirmed during the detailed design phase' (PDF p. 113), and acquired areas 'should not be equated to the size of the infrastructure' (PDF p. 138). The reader cannot tell how much of each acquisition is switchyard, laydown, APZ, water dam or spare.

Generator connections and auxiliary power are excluded.

Hubs are designed 'to accommodate connection infrastructure from renewable generation projects which are subject to separate planning and approval processes' (PDF p. 117). Auxiliary supply routes 'have not been assessed as part of this EIS' (PDF p. 118). Each hub will sit at the centre of generator lines and new distribution poles that no cumulative visual, noise or land-use assessment includes.

Operational noise compliance depends on uncommitted barriers.

Only with 'indicative four metre high noise barriers' at Central Hub A and North Hub is operational noise 'predicted to be below the PNTLs at all residential receivers' (TR09 pp. 10, 93). North Hub is 160 m from a dwelling. Appendix F does not require the barriers; the hub descriptions say noise walls 'if required' (PDF p. 114).

Camps 4 and 5 sit inside hub construction sites.

550 people will sleep for six years inside the busiest construction sites on the project (TR14 pp. 59, 99). The noise report assesses the camps' effect on neighbours, not the hubs' effect on camp occupants.

Nemingha, lighting and land take.

The Nemingha facility is under 10 m from a receiver, with 4 highly noise affected receivers during intensive construction (TR09 pp. 60, 63), and has no visual or social assessment of its own. Hubs have dusk-to-dawn lighting for the project life (PDF p. 118), with no night-time photomontage. About 1,200 ha is acquired for hubs, but agricultural loss is valued on the 471 ha operational footprint (PDF p. 571); some 700 ha of acquired farmland is neither valued nor given a future use.

2.3 Consequences

Approval would fix substations and their noise, lighting and connections before their footprints and design are known, leaving compliance to detailed design that the public will not see.

> POSITION SOUGHT

1. Hub noise barriers, equipment selection and enclosures should be fixed in the conditions, with receiver levels without barriers disclosed now.
2. Auxiliary power routes and generator connection corridors should be assessed and exhibited before hub construction.
3. EnergyCo should provide the built footprint of each hub against the acquired area, and the future use of the balance.

3 | Laydowns, compounds, batching plants and helipads

3.1 Evidence

Site	What the documents say	In Table 3.5?	Pages
Timor Crawney Road laydown (two areas)	165 ha full acquisition; tributaries of Bushes Creek 'may require filling, and/or re-direction'; four farm dams in footprint; Isis River 60 m west; nearest residence 200 m; helipad likely	Yes	PDF p. 138; TR14 pp. 59, 69, 99, 103; TR09 pp. 60, 101; TR06 p. 54
Albano Road (Rouchel Brook) laydown	210 ha full acquisition; partly in waterfront land of a 4th-order reach of Stony Creek; nearest residence 770 m; in the Rouchel anthrax district	Yes (mislabelled 'north-east of Muswellbrook')	PDF p. 138; TR14 pp. 59, 99; TR09 p. 60; TR20 pp. 17–18
Barry Road laydown (two areas)	On a ridgeline in the upper Chaffey Dam catchment; nearest residence 1,425 m	No	TR14 pp. 44, 59, 103; TR09 p. 60
Camp 2 laydowns (two)	Described in the water and visual reports only	No	TR14 p. 69; TR05 p. 185
Batching, crushing and screening plants; helipads; 'high volume laydown'	'may be located at suitable sites anywhere within the project area subject to the location assessment protocol'	No	PDF pp. 102, 171–172
Water management dams	'constructed as needed within the project area' under harvestable rights	No	PDF p. 174

> Table 3 - **Laydowns, compounds and other ancillary sites**

Total full acquisition for camps and laydowns is 1,455 ha (Table 3.5), plus 1,199 ha for hubs and permanent facilities (Table 3.4): about 2,650 ha of land acquisition, full or partial, against a 471 ha operational footprint.

3.2 EIS shortcoming

The exhibited list of ancillary sites is not the real list.

Table 3.5 names two laydowns. The technical reports assess five. Section 3.3.12 then allows further sites 'anywhere within the project area subject to the location assessment protocol' (PDF p. 172). The EIS itself concedes that 'ancillary sites have the potential to result in greater environmental and social impacts than routine construction activities and therefore require additional assessment, siting and mitigation' (PDF p. 171).

The location assessment protocol is not a control.

Its considerations include 'separation distances from sensitive receivers' (no distance stated) and avoiding flood-prone land 'where practicable'. There is no decision-maker outside the proponent, no notification and no publication; 'the final locations would be confirmed during detailed design and documented in the CEMP' (PDF p. 172).

Batching, crushing plants and helipads have no locations.

No site, throughput, dust or noise assessment is given for materials processing (PDF pp. 171, 174). Helipads are 'likely to be established at each of the laydown areas plus at Crawney Road North Timor' (TR06 p. 54), with 'high LAmax noise levels' predicted near the Waverley and Timor sites (TR09 p. 101). There are no flight paths, hours, fuel storage or equine and livestock assessment. The effect of helicopter operations and easement restrictions on farming is addressed in Section 11 (Effects on Farming).

The named laydowns are large farms with no site assessment.

Neither Timor Crawney Road nor Albano Road is assessed as a land-use change, an agricultural loss, a visual object or a social presence. The Barry Road and Camp 2 laydowns are not in the acquisition table, so either they sit within other acquisitions (not stated) or the 1,455 ha total is wrong.

Built before plans exist, and no rehabilitation standard.

Establishing ancillary facilities is enabling work outside the CEMP (PDF p. 144). Sites 'would be rehabilitated following completion of construction activities' (PDF p. 172), with no standard, timing, bond or landholder sign-off.

3.3 Consequences

The public is asked to comment on a project whose industrial sites can be anywhere in 10,928 ha. There is nothing to which a site-specific condition can attach, and new sites would be approved inside a contractor's management plan without public scrutiny.

> POSITION SOUGHT

1. The approval should be confined to ancillary sites identified and assessed in an exhibited document. Any other camp, laydown, batching plant, crushing plant or helipad should be a modification under s 5.25 with public exhibition. No 'location assessment protocol'.
2. EnergyCo should explain the 165 ha and 210 ha laydown acquisitions, state whether any dwelling will be acquired, and identify whether the Albano Road laydown is on a Rouchel anthrax property.
3. Helipad locations, flight paths and hours should be fixed and notified, with separation from equine facilities set with DPIRD.

4 | Central-West Orana: the same proponent, two years earlier

4.1 Evidence

EnergyCo's Central-West Orana REZ Transmission project (SSI-48323210) was exhibited in September–October 2023, amended in May 2024 and approved on 26 June 2024; the consolidated approval cited was last modified on 2 December 2025. It is the direct precedent for how EnergyCo describes camps, hubs and laydowns and how DPHI conditions them. CWO page references are PDF pages of the exhibited CWO EIS main report (printed chapter page in brackets).

Matter	CWO EIS (2023)	NE REZ EIS (2026)
Camp site and size	'about 41 hectares in size and would accommodate up to 1,200 people', next to the Merotherie Energy Hub compound (PDF p. 172 [3-60]); satellite camp 'at 118 Neeleys Lane, Turill… up to 600 people' (p. 173 [3-61])	Camp 2: 780 ha full acquisition, ~320 workers; no address, no camp footprint (PDF pp. 138, 146)
Hub sizes	Merotherie and Elong Elong hubs 'around 200 hectares and 75 hectares respectively, inclusive of the required APZ buffers' (p. 131 [3-19])	Acquisition areas of 35–335 ha that 'should not be equated to the size of the infrastructure' (p. 138)
Compounds and processing	Crushing, grinding and screening 'would be located at the New Wollar Switching Station, Merotherie Energy Hub and Elong Elong Energy Hub construction compounds' (p. 166)	'may be located at suitable sites anywhere within the project area' (p. 171)
Criteria for additional sites	'separated from the nearest residences by at least 200 metres', 'above the 20 year average recurrence interval flood level', 'subject to further assessment and approval' (p. 171 [3-59])	'separation distances from sensitive receivers' (no distance); confirmed 'during detailed design and documented in the CEMP' (p. 172)
Potable water	'sourced from council owned potable water supplies in Dunedoo and Coolah… and Gulgong where possible' (p. 177 [3-65])	'sourced from existing water supplies or purchased via vendor' (pp. 101, 173)
Camp wastewater	WWTP to AS/NZS 1547; 240 L per person per day; establishment wastewater to a council treatment plant (pp. 177–178)	'disposed of at a licenced wastewater facility' (p. 101); no design basis or facility
Camp power	Connection to the local power grid; annual demand stated (p. 178 [3-66])	Routes 'have not been assessed as part of this EIS' (p. 118)
Peak workforce vs camp capacity	Up to around 1,800 personnel; camps for up to around 1,800 (pp. 146–147)	~1,400 personnel on site at any one time; capacity for about 2,060 (pp. 102, 143, 146)

> Table 4 - **What the CWO EIS stated that the NE REZ EIS does not**

Condition	Requirement	NE REZ position
B52	Camps constructed and operated 'as described in the EIS'	Impossible for Camp 3 and Camp 1 Alternate, which the EIS does not describe
B53	Accommodation Camp Management Plan approved before camp construction: utilities to council standards, wastewater reuse standards, capacity per camp, layout and servicing, worker health	Partly anticipated by SO4 (Workforce Management Plan), with no utilities, capacity or servicing content
B56	Camps decommissioned and rehabilitated within 12 months of operations commencing	No timeframe
B57	Ancillary facilities rehabilitated within 6 months of the end of their use	No timeframe
B7	Mitigation in place before camp or compound activities exceeding noise or sleep criteria start	Six sleep-disturbance exceedances accepted; mitigation is 'judicious placement'
B18	Water management at substations, batching plants, compounds and camps	Batching plant locations unknown
C8	Final Layout Plans of towers and ancillary facilities, compared to the approved layout, before construction	Nothing comparable; the location assessment protocol would operate inside the CEMP

> Table 5 - **How DPHI conditioned the CWO camps and ancillary sites (Consolidated Approval)**

At CWO, councils and Transport for NSW asked for camp layouts, decommissioning dates, accommodation strategies, origin–destination surveys, SISD checks, turn warrants and swept paths (CWO Submissions Report pp. 389–390, 432, 465, 529–530). Upper Hunter Shire Council was among them. The same councils and agencies will assess this EIS.

The full CWO comparison, including all conditions and the questions councils and agencies asked at CWO, is in Appendix D.

4.2 EIS shortcoming

Every row of Table 4 is a matter EnergyCo was able to state two years ago and has not stated now, for a project with more than twice as many camps on a line nearly twice as long. At CWO, EnergyCo also committed that 'any future upgrades or augmentation… that are not consistent with the planning approval would be considered a project modification'; the NE REZ EIS is silent.

4.3 Consequences

The NE REZ EIS falls below the proponent's own precedent. The failure to name, site and assess Camp 3 and Camp 1 Alternate is a choice, not a limitation of the process.

> POSITION SOUGHT

1. Use of the camps by other REZ projects, or any augmentation, should be a modification under s 5.25, given that camp capacity (about 2,060) exceeds the stated peak workforce on site (about 1,400) and the EIS does not explain the ratio.
2. TfNSW-standard intersection assessment (SISD, turn warrants, swept paths) should be required for the Camp 2, Camp 3, Central Hub A and Central South Hub accesses before use.

Questions the EIS must answer before determination

Where is Camp 3, on whose land, what area, and when will its assessment be publicly exhibited?

Which Camp 1 site is proposed, and on what basis will the other be dropped?

For each camp: the exact footprint within the acquired land, the nearest dwellings to that footprint, and the night-time noise, lighting and traffic at those dwellings.

Why 780 ha for Camp 2, 300 ha for Camp 1, and 165 ha and 210 ha for the two laydowns; what is on that land now; what will it be used for during and after construction?

What share of the 1,400 peak workforce is assumed to live in camps, and what is the housing impact if occupancy is 60 per cent or a camp is six months late?

Who supplies 340 ML of potable water, where does each camp's effluent and sludge go, which landfill takes the waste, and has each receiving council or utility confirmed capacity in writing?

Where will the auxiliary power lines to each hub and camp run, and when will they be assessed and exhibited?

Where are the concrete batching, crushing and screening plants, and what are their throughputs?

Where are the helipads, what are the flight paths and hours, and which equine and livestock operations lie under them?

Which intersections serving camps and hubs have been checked for SISD, turn warrants and swept paths, and with what results?

What are hub operational noise levels at each receiver without the assumed 4 m barriers, and will the barriers be conditioned?

Will the camps be used for other REZ projects, and will any augmentation be a modification under s 5.25?

What is the decommissioning date and rehabilitation standard for each camp and laydown, and what security is offered?

What ambulance, police and hospital arrangements exist for 550-bed camps at Walcha Road and Kentucky and a 320-bed camp at Barry?

How many new harvestable-rights dams will be built on the acquired land, and which downstream landholders are affected?

> POSITION SOUGHT

Camp 3 has not been located or assessed.

The EIS must therefore be revised and re-exhibited once Camp 3, Camp 1 Alternate and every other camp and ancillary site has been located and assessed, and the Department and Planning Minister should not determine the project before then.

Accordingly, the submission seeks the following position:

1. Because Camp 3 is unlocated and unassessed, EnergyCo should be required to prepare a revised EIS that fixes and assesses all camps, hubs, laydowns, batching and crushing plants and helipads, and the Department should re-exhibit it for public comment. A Submissions or Amendment Report that the public cannot comment on is not an adequate substitute.
2. The Minister should refer the assessment to the Independent Planning Commission for advice and a public hearing under s 2.9 of the EP&A Act, because the material on these sites is incomplete and needs independent testing.
3. Approval should be confined to camps and ancillary sites identified and assessed in an exhibited document; any other site should be a modification under s 5.25 with public exhibition.
4. An Accommodation Camp Management Plan on the CWO B53 model should be approved before any camp construction, with a capacity cap per camp, written servicing confirmation, a minimum separation to dwellings consistent with no sleep-disturbance exceedance, and camps for this project only.
5. Camp construction should not be classed as enabling work; the noise, traffic, soil and water and social plans should apply from the first earthworks.
6. Camps should be decommissioned within 12 months of energisation of the stage they serve, and ancillary sites within 6 months of last use, to a standard agreed with the landholder and council and secured by bond.
7. Hub noise barriers and equipment should be fixed in the conditions, with operational monitoring including tonality and low-frequency assessment, and results published.
8. A property-specific assessment of each acquired camp and laydown parcel (farm enterprise, dwellings, water, access) should be published before acquisition is completed, with a statement of post-construction land use.
9. On-site medical capacity at each camp should be supported by a funded agreement with NSW Ambulance and the local health district, and the Workforce Management Plan should cap local accommodation use during enabling works in Scone, Aberdeen, Murrurundi, Nundle and Hanging Rock.

This is not a request that EnergyCo finalise every engineering detail before approval. It is a request that the sites where about 2,060 people will live and where industrial activity will run for six years are known, assessed and open to public comment before the decision that gives them planning authority.

Key references

Environmental Planning and Assessment Act 1979 (NSW), Division 5.2, particularly ss 2.9, 5.17, 5.25.

Environmental Planning and Assessment Regulation 2021 (NSW), s 192(1)(d).

Planning Secretary's Environmental Assessment Requirements (SEARs), SSI-74175972, amended August 2026: General Requirements (project description; consistency), Biodiversity, Water and Soils, Waste, Social Impact.

EnergyCo, New England REZ Network Infrastructure Project EIS, October 2026: EIS-02 Chapter 3 (PDF pp. 100–119, 137–151, 158, 171–174, 181), PDF pp. 537, 571, 762, 804; Appendix F mitigation measures.

Technical Reports: TR04 Social Impact pp. 159–165; TR05 Landscape and Visual pp. 185, 195, 200; TR06 Agriculture pp. 54, 57; TR07 Traffic pp. 92, 119, 151; TR09 Noise and Vibration pp. 10, 21, 30, 58, 60–65, 75, 93, 101, 165; TR12 Bushfire pp. 5–6, 61, 64–65; TR14 Surface Water pp. 44, 59, 69, 99, 103; TR20 Anthrax pp. 17–18.

EnergyCo, Central-West Orana REZ Transmission EIS (2023), Chapter 3, PDF pp. 131, 146–148, 154–159, 166–167, 171–180.

EnergyCo, Central-West Orana REZ Transmission Submissions Report (December 2024), pp. 52–54, 389–390, 432–433, 465–466, 529–530.

Central-West Orana REZ Transmission (SSI-48323210), Consolidated Infrastructure Approval, conditions B7, B18, B45, B46, B52–B57, C8–C9.

NSW Department of Planning, Housing and Infrastructure, SSI Guide Appendix E – Preparing a Preferred Infrastructure Report (2026), s 1.3.

NSW Department of Planning and Environment, Social Impact Assessment Guideline for State Significant Projects (2023), Appendix C, review question 19.

M12 Motorway (SSI 9364) Consolidated Conditions of Approval (MOD 1, 2024), conditions A15–A16 (additional construction ancillary facilities).

Appendix A
How each discipline assessed the camps, hubs and laydowns

Main EIS pages are PDF pages of EIS-02 (printed page = PDF page − 35); technical report pages are PDF pages of that report.

Discipline	What was done	What was not done	Pages
Noise (TR09)	Worst-case construction and 24/7 operation modelled for Camps 1, 2, 4, 5, three laydowns, the maintenance facility and the hubs, with noise sources placed 'at the closest extent of the project area to each receiver'; Camp 3 given distance-based thresholds only (exceedances within 1,300 m during establishment, 1,080 m at night, sleep disturbance within 325 m); hub operational noise compliant only with 'indicative four metre high noise barriers' at Central Hub A and North Hub	Camp 3 and Camp 1 Alternate not assessed; no receiver counts for camp-generated road traffic at night (shift buses); no assessment of helipads at camps beyond 'high LAmax' at Waverley and Timor; the barriers are not in Appendix F	TR09 pp. 10, 21, 60–65, 93, 101
Traffic (TR07)	Camp access points, primary routes and peak daily movements per camp (Table 3.6: 386 to 1,316 movements a day); enabling-works traffic described as low; road treatments listed	No origin–destination or shift-timing analysis; no assessment of the Camp 1 Alternate access on the New England Highway; Camp 3 'access is assumed to be via Barry Road'; the traffic and noise reports disagree on whether Camp 2 supply runs through Gundy village	TR07 pp. 92, 119; EIS-02 PDF pp. 149–150; TR09 p. 165
Social and housing (TR04)	Short-term room counts within an hour of each camp for a 40-person enabling crew; councils' preference for camps near towns recorded; health and emergency service capacity at camp localities assessed as 'very low or no'	Housing impact assumed 'minimal' because the camps will exist; no analysis of what happens if a camp is late, undersized or relocated; no legacy or re-use plan despite councils asking; no assessment of a 320-bed camp on Barry, which has 'no recorded population' and no social baseline	TR04 pp. 160, 162–165; EIS-02 PDF p. 146
Water and wastewater (TR14; EIS s 3, 18)	Catchment context and waterfront-land interactions for Camps 1, 2, 4, 5 and three laydowns; 340 ML potable for workforce and 272 ML non-potable for 'camp general maintenance' estimated; wastewater treatment plants proposed at camps	No potable source confirmed for about 2,060 camp places ('EnergyCo has engaged with councils, AGL and WaterNSW'); no sewage volume, treatment standard, effluent disposal route or receiving facility named ('disposed of at a licenced wastewater facility'); no s 68 Local Government Act approval pathway discussed for on-site systems; four farm dams removed at Timor with downstream detention loss 'to be considered during detailed design'	EIS-02 PDF pp. 101, 173–174, 185, 804; TR14 pp. 59, 99, 103
Waste (EIS s 23)	Waste streams listed generically	No quantification of camp domestic waste or sewage sludge, no receiving landfill or treatment plant capacity, no agreement with any council	EIS-02 PDF pp. 796–810
Air and odour (EIS s 20)	Camp wastewater plant odour judged 'not significant' on distance	No batching-plant or crushing-plant locations, so no dust assessment of them; dust from 780 ha of camp and laydown hardstand not modelled	EIS-02 PDF p. 762

Bushfire (TR12)	SFPP asset protection zones calculated for Camps 1, 2, 4, 5 and a range table for Camp 3; BAL 29 APZs for hubs; construction ancillary sites get APZs 'refined when the site layout of the laydown is determined'	Camp 3 APZ cannot be fixed; evacuation routes from camps (Waverley Road, Barry Road, single unsealed access) not assessed as evacuation routes; no RFS concurrence shown for SFPP camps	TR12 pp. 5–6, 64–65; App. A–B
Visual (TR05)	Viewshed review for camps and laydowns; a handful of dwellings assessed (N-39 D7 at 600 m from Camp 5; O-34 D4 at 295 m from Camp 4; I-17 DN6 at 550 m from the Timor laydown; I-15 DN9 at 745 m from the Camp 2 laydown); camp lighting section	Camps dismissed on 'low height… and the temporary nature of the works' for six years of 24-hour lighting; no night-time photomontage; hubs' 38 m equipment assessed but barriers and lighting towers not	TR05 pp. 195, 200
Biodiversity (TR01)	Camps and laydowns inside the project area are within the BDAR footprint	Camp 3 is not in the BDAR; Camp 1 Alternate is not; 'additional' ancillary sites anywhere in the project area are assessed only to the extent the surrounding project area was surveyed (54 per cent)	TR01 p. 69; EIS-02 PDF pp. 171–172
Heritage (TR02, TR03)	Hub and camp footprints inside the surveyed area are covered	Barry Station curtilage crossed by the corridor; Camp 3 and the Barry Road laydown sit in the section with 'minimal survey'; no camp-specific heritage assessment	TR02 p. 280; TR05 p. 127
Agriculture (TR06)	A paragraph on 'land use conflicts' between camps and farms (spraying, mustering, shearing) with mitigation 'as set out in Chapter 9'	No site-specific assessment of the 780 ha, 300 ha, 210 ha or 165 ha acquisitions as farms; no explanation of why 780 ha is needed; no statement of what the acquired land will be used for during or after construction ('subject to confirmation during detailed design')	TR06 p. 57; EIS-02 PDF p. 138
Hazards (EIS s 17)	Hubs: oil containment to 130 per cent of largest volume; preliminary risk screening	Diesel storage at camps and laydowns, helipad fuel, explosives magazines for blasting between Pages Creek and Niangala: locations and quantities not assessed	EIS-02 PDF pp. 117, 668–717; TR06 p. 55
Economics (TR08)	Workforce spend modelled by input–output	No camp procurement, catering or local-business displacement analysis; no cost of council services to camps	TR08
Cumulative (EIS s 24)	Other REZ projects listed; Regional Major Infrastructure Studies acknowledged but 'not directly comparable'	No cumulative camp-bed count across generators and this project; no reconciliation with the studies' accommodation findings; Hills of Gold shares Barry Road with Camp 3 traffic	EIS-02 PDF p. 812; TR07 p. 151

> Table A1 - **Assessment of ancillary infrastructure by discipline**

Appendix B
Appendix F mitigation measures covering ancillary infrastructure

Measure	What it says	Class
AG8	Camps 'will be designed and located to minimise potential land use conflicts... located away from cropping areas and farm infrastructure'	Consultation; no distance or criterion
SO4	'The Workforce Management Plan will be prepared and implemented'	Deferred to plan
BF5	SFPP APZ compliance for Camps 1, 2, 4, 5; 'Camp 3 site will be selected and designed to achieve SFPP APZ compliance'	Deferred to plan
BF6, BF9	Emergency Management Plans	Deferred to plan
BF7	BAL 29 APZs for laydown areas	Restates PBP
FL8	'Flood risk should be considered during site layout at detailed design stage. Where camps, laydowns or ancillary facilities are proposed within flood-prone areas, the need for setbacks... [will be considered]'	Deferred to detailed design
NV8	Aircraft noise measures 'where practicable and appropriate', notification	Deferred to plan
NV10	'Operational noise impacts from the energy hubs will be reviewed during detailed design'	Deferred to detailed design
AQ3	Measures 'will be implemented at concrete batch plants to minimise emissions'	Deferred to plan
GW3, GW4	Dewatering and groundwater plans for hub cuts and construction extraction	Deferred to plan
LV1, LV4, LV7	Colour palette, screening offers, lighting design to AS/NZS 4282	Deferred to detailed design / plan
GH10	'Consideration will be given to using on-site renewable energy' at camps	Further study
WM4	Waste hierarchy 'will be applied'	Further study
TT19	Access points designed by function	Restates standard
EM1	Hubs designed to ICNIRP magnetic field limits	Deferred to detailed design

> Table B1 - **Appendix F measures and what they commit to**

No measure fixes a camp location, a minimum separation distance, a camp capacity cap, a decommissioning date, an effluent destination, a water source, a hub noise barrier or a batching plant site. None of these measures can be tested at exhibition.

Appendix C
How the Department will test ancillary infrastructure

DPHI's assessment report will deal with ancillary infrastructure in three places: the project description (is the project defined well enough to approve?), the issue chapters (noise, traffic, social, water), and the conditions (can what is unresolved be fixed by a plan 'to the satisfaction of the Planning Secretary'?). The table sets out the tests the Department applies and where the EIS fails them.

DPHI test	Source of the test	Where the NE REZ EIS stands
Is every component located and described (SEARs General Requirements, project description; Reg s 192(1)(d)(i))?	SSI Guidelines; Transmission Guideline	Camp 3 and Camp 1 Alternate not located; further ancillary sites anywhere in the project area; batching and crushing plants unlocated; auxiliary power routes excluded
Has each ancillary site been assessed, or does the EIS rely on a post-approval protocol?	DPHI conditions on linear SSI, e.g. M12 Motorway (SSI 9364) conditions A15–A16: an ancillary facility not identified in the EIS may be used only if not adjacent to a sensitive receiver without written acceptance, with no heritage or biodiversity impact beyond that approved, and under a Site Establishment Management Plan endorsed by the Environmental Representative and approved by the Planning Secretary; CWO condition C8 (final layout plans)	The 'location assessment protocol' has no fixed criteria and no independent sign-off; the EIS itself says ancillary sites 'require additional assessment, siting and mitigation'
Can the camps be conditioned as the CWO camps were (capacity per camp, utilities to council standards, decommissioning deadline)?	CWO Consolidated Approval B52–B57	Capacity is stated; utilities, effluent and waste routes are not; no council has confirmed capacity; no decommissioning timeframe
Does the SIA's housing conclusion survive if the camps are late or undersized?	SIA Guideline (2023): significance of residual impacts; responses must be 'tangible, deliverable, likely to be durably effective' (Appendix C, Q19)	The conclusion rests on the camps; the SIA concedes effectiveness 'will depend on… camp occupancy rates'; the only measure is a Workforce Management Plan (SO4)
Are the intersections serving hubs and camps shown to work (SISD, turn warrants, swept paths)?	TfNSW practice (as applied on CWO)	'Conceptual' treatments; Camp 1 Alternate access on the New England Highway unassessed; OSOM 'last mile' subject to NHVR
Is operational hub noise compliant without reliance on uncommitted design?	Noise Policy for Industry	Compliance assumes 4 m barriers not in Appendix F; NV10 says noise 'will be reviewed during detailed design'
Are the camps safe from bushfire and evacuable?	Planning for Bush Fire Protection 2019 (SFPP)	APZs calculated for four camps; Camp 3 unknown; evacuation routes not assessed; RFS concurrence not shown
Are water sources confirmed and lawful?	DCCEEW Water advice; Aquifer Interference Policy; WM Act	No source confirmed; public-authority exemption claimed; new harvestable-rights dams on acquired land unassessed
Is the land acquisition proportionate and justified?	Just Terms Act; Land Acquisition Guide; property impact assessment	780 ha for 320 beds, 165 ha and 210 ha laydowns, with no explanation

> Table C1 - **Department tests and the NE REZ EIS**

Appendix D
Central-West Orana comparison in full

EnergyCo's Central-West Orana REZ Transmission project (SSI-48323210) is the only direct precedent for how EnergyCo describes camps, hubs and laydowns and how DPHI conditions them. Sources are the CWO EIS fact sheet, the CWO EIS main report (PDF pages, printed chapter page in brackets), the Submissions Report (December 2024) and the Consolidated Approval.

Element	CWO	NE REZ	Comment
Camps	Two: Merotherie Road, Merotherie, 'up to 1,200 workers', adjacent to the Merotherie Energy Hub and main compound; Neeleys Lane, Turill (Cassilis), 'up to 600 workers'	Five: 320 / 320 / 320 / 550 / 550	CWO camps were named, sited and co-located with the main compound and hub; NE REZ has one camp unlocated and one alternate
Camp capacity vs workforce	camps for 'up to 1,800 workers at peak'	capacity for about 2,060 against ~1,400 peak on site at any one time	NE REZ capacity exceeds its stated peak on-site workforce; neither EIS explains the ratio
Site selection criteria stated	'minimising the number of camps… minimising travel time… avoiding the need for compulsory acquisition of land where possible, ensuring suitable access to the road network, minimising clearing by using land that has already been disturbed' (Submissions Report p. 432)	'selected on existing agricultural land that contain cleared and previously disturbed areas'; travel time 'around 45 minutes' (EIS-02 PDF pp. 145, 147)	CWO avoided compulsory acquisition for camps; NE REZ lists 1,080 ha of full freehold acquisition for Camps 1 and 2
Compounds	Four, named: Merotherie hub, Elong Elong hub, New Wollar switching station, Neeleys Lane; later a compound added at Neeleys Lane camp as an amendment with its own traffic appendix	Two named laydowns in Table 3.5; three more in technical reports; others anywhere in the project area by protocol	CWO treated a new compound as an amendment to be assessed; NE REZ treats new sites as a CEMP matter
Enabling crews housed locally	'around 100 construction workers… four to six months', using 'existing local hotel, motel and rental accommodation' (pp. 389, 432, 465)	40 per camp, 200 total, six months (TR04 p. 162)	Same approach; NE REZ's smallest towns bear a larger share (71 per cent of rooms near Camp 2)
Camp facilities	demountables, catering, laundry, first aid and medical practitioners, sports fields, cinema, wastewater treatment plant, CCTV, dark-sky lighting to the Siding Spring guideline (p. 389–390)	demountables, catering, gym, first aid and on-site practitioners, helipad, laydown, WWTP, diesel generators, solar (PDF p. 147)	Comparable, except NE REZ adds a helipad at every camp
Upgrade or shared use	'Any future upgrades or augmentation… that are not consistent with the planning approval would be considered a project modification' (p. 53)	Silent	A commitment EnergyCo gave at CWO and has not given here

Power	'likely… a connection to the Essential Energy distribution network', generators where impracticable (p. 53)	Auxiliary routes 'have not been assessed as part of this EIS' (PDF p. 118)	At CWO the answer was given in the Submissions Report; here it is deferred to an Amendment Report or later
Legacy	'would not be suitable for conversion to permanent housing' (p. 432); councils' preference for town-adjacent camps 'noted'	'outside the scope of the project' (TR04 p. 160)	Same position; councils objected both times

> Table D1 - **How EnergyCo described the ancillary infrastructure at CWO and at NE REZ**

Matter	CWO EIS (2023)	NE REZ EIS (2026)
Camp site and size	'The workforce accommodation camp site is about 41 hectares in size and would accommodate up to 1,200 people', 'next to the Merotherie Energy Hub main construction compound, about six kilometres south of the intersection of Merotherie Road with the Golden Highway' (PDF p. 172 [3-60]); satellite camp 'at 118 Neeleys Lane, Turill… up to 600 people' (p. 173 [3-61])	Camp 2: 'Camp 2 – Full – 780' ha, '~320 workers'; no address, no camp footprint (PDF pp. 138, 146)
Hub sizes	'The energy hubs at Merotherie and Elong Elong would occupy an area of around 200 hectares and 75 hectares respectively, inclusive of the required APZ buffers'; New Wollar Switching Station 'around 35 hectares (inclusive of the required bushfire asset protection zone (APZ) buffer and access road)' (p. 131 [3-19])	Acquisition areas of 35–335 ha that 'should not be equated to the size of the infrastructure' (p. 138)
Compounds	Three named compounds at the two hubs and the switching station, each with a listed inventory including batching plant, cement silo, crushing plant, helipad and refuelling, testing laboratory, WWTP (pp. 147, 166–167 [3-35, 3-54–3-55]); crushing, grinding and screening 'would be located at the New Wollar Switching Station, Merotherie Energy Hub and Elong Elong Energy Hub construction compounds' (p. 166)	Batching, crushing and screening plants 'may be located at suitable sites anywhere within the project area' (p. 171)
Criteria for additional sites	'Alternative or additional sites (if required outside the construction area) may be added, and would be subject to further assessment and approval'; criteria include 'separated from the nearest residences by at least 200 metres, unless feasible and reasonable noise and light spill mitigation measures are implemented', 'above the 20 year average recurrence interval flood level', 'not requiring native vegetation clearing beyond that already required' (p. 171 [3-59])	'separation distances from sensitive receivers' (no distance); 'avoidance of flood prone land where practicable'; 'minimisation of vegetation clearing'; confirmed 'during detailed design and documented in the CEMP' (p. 172)
Potable water source	'sourced from council owned potable water supplies in Dunedoo and Coolah… and Gulgong where possible' (p. 177 [3-65])	'sourced from existing water supplies or purchased via vendor'; 'EnergyCo has engaged with councils, AGL and WaterNSW' (pp. 101, 173)
Groundwater	'Two new bores would be established, one at each of the energy hubs at Elong Elong and Merotherie… Around 125 megalitres of groundwater would be taken over the construction period from each' named source 'under water access licences for the project' (p. 177)	Groundwater listed as a source; public-authority exemption from water access licences claimed (p. 174); no bore, volume or source named

Camp wastewater	WWTP designed to AS/NZS 1547 and the Australian Guidelines for Water Recycling; 'up to 240 litres of water would be used per day, per person'; 'an EPL for sewage treatment… is not anticipated to be required'; establishment-phase wastewater 'transported to a council wastewater treatment plant'; sludge to a licensed facility (pp. 177–178 [3-65–3-66])	'Wastewater treatment plants are proposed at workforce accommodation camps… Remaining wastewater or waste from treatment plants would be disposed of at a licenced wastewater facility' (p. 101); no design basis, standard, per-capita figure or receiving facility
Camp power	'connection of the construction site offices and workforce accommodation camps to the local power grid'; annual demand stated (p. 178 [3-66])	Grid, 'alternative' or diesel; routes 'have not been assessed as part of this EIS' (p. 118)
Interim camps	'Interim workforce accommodation camps… would be located within the same areas identified for the construction compounds and final workforce accommodation camps', with generators, toilets and water trucks (p. 154 [3-42])	Enabling crews of 40 per camp in local motels for six months (TR04 p. 162)
Construction area	'Around 4,000 hectares comprising the area that would be directly impacted by the construction of the project, including… workforce accommodation camps, construction compounds, brake and winch sites and laydown and staging areas' (p. 146 [3-34])	Disturbance footprint 3,579 ha inside a 10,928 ha project area within which sites can move (pp. 100–101, 109)
Peak workforce vs camp capacity	'up to around 1,800 personnel' (p. 146); camps 'for up to around 1,800 staff' (p. 147)	~1,400 personnel on site at any one time; capacity for about 2,060 (pp. 102, 143, 146)

> Table D2 - **What the CWO EIS project description said, page for page, that the NE REZ EIS does not say**

The CWO description is not a model of precision, and the community there objected to much of it. But every row above is a matter EnergyCo was able to state two years ago and has not stated now, for a project with more than twice as many camps on a line nearly twice as long.

What councils and agencies asked for at CWO (Submissions Report)

- Mid-Western Regional Council: construction program, camp layouts and recreation, lighting levels, dry or wet camp, firefighting and medical facilities, a decommissioning condition with a date, a condition confining the camp to this project, the number of workers using local accommodation, and where the camp-builders would stay (pp. 389–390). All answered, if briefly.
- Dubbo Regional Council: camps within or next to towns for legacy housing; mechanisms to ensure the contractor actually delivers the camps on time; the 1,800 figure 'does not include ancillary and other workers' (p. 432).
- Upper Hunter Shire Council: 'a detailed accommodation strategy which addresses community concerns and outlines the methodology for construction and operation of the camps' (p. 465).
- Transport for NSW: camp traffic volumes by vehicle class, servicing traffic, construction-of-camp traffic, origin–destination survey, staging, SISD compliance at the Golden Highway intersections at 300 m, turn warrants, strategic designs with swept paths (pp. 529–530). EnergyCo answered with a new traffic appendix to the Amendment Report.

The same councils (Upper Hunter Shire among them) and the same agencies will assess the NE REZ EIS. The questions they asked at CWO are the questions this EIS leaves unanswered.

Condition	Requirement	NE REZ equivalent in the EIS
B52	Camps constructed and operated 'as described in the EIS' and Appendix 1, following the staging in B53	Impossible for Camp 3 and Camp 1 Alternate, which the EIS does not describe
B53	Accommodation Camp Management Plan approved by the Planning Secretary before camp construction: utilities designed to council and relevant standards; treated wastewater reuse to irrigation and public-health standards; dust; 'quantify the proposed capacity of workers accommodated at each accommodation camp'; layout, access and servicing; local suppliers; worker health and on-site medical	Partly anticipated by SO4 (Workforce Management Plan) but with no utilities, capacity or servicing content
B56	Camps decommissioned and rehabilitated within 12 months of operations commencing; infrastructure removed to 500 mm depth	No timeframe
B57	Ancillary facilities and earthworks material sites rehabilitated within 6 months of the end of their use	No timeframe
B7	Where camps or compounds are expected to exceed construction noise or sleep disturbance criteria, mitigation in place before those activities start	Six sleep-disturbance exceedances accepted; mitigation is 'judicious placement'
B18	Water management systems at substations, batching plants, compounds and camps designed to prevent pollution	Batching plant locations unknown
B45	20,000 L water tank with 65 mm Storz fitting at every compound; buildings to AS 3959; APZs within the approved disturbance area	APZs calculated, Camp 3 excepted
B46	Emergency Plan including camp evacuation before construction	BF6 (plan to come)
B54, B55	Local Business and Employment Strategy; Social Impact Management Plan addressing housing availability and affordability and labour draw	SO1–SO4 (plans to come)
C8	Final Layout Plans showing 'siting of transmission towers and ancillary infrastructure and / or ancillary facilities' with a comparison to the approved layout, before construction	Nothing comparable is offered; the location assessment protocol would operate inside the CEMP

> Table D3 - **How DPHI conditioned CWO (Consolidated Approval)**

What carries over to the NE REZ submission

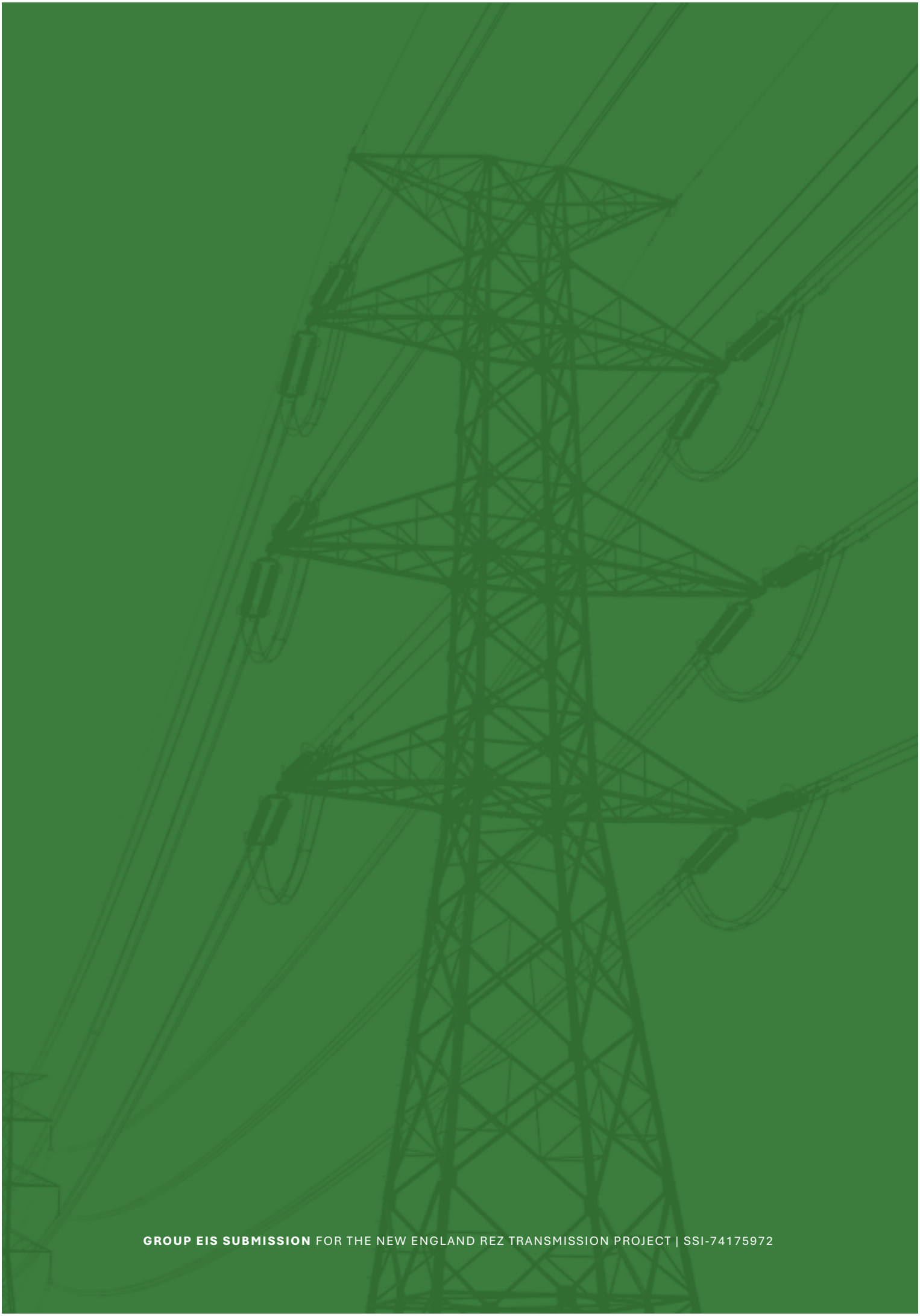
1. CWO proves that a camp can be named, sited and assessed in an EIS and conditioned to a capacity and a decommissioning date. The NE REZ EIS's failure to do so for Camp 3 and Camp 1 Alternate is a choice, not a limitation of the process.
2. The CWO approval's B52 ('as described in the EIS') is the standard condition DPHI will reach for. It cannot be imposed on a camp the EIS does not describe. The remedy is to require the Amendment Report to be exhibited, and to confine the approval to the exhibited sites.

3. TfNSW's CWO requests (SISD, turn warrants, swept paths, origin–destination, staging) give councils a ready-made list for the Camp 2 (Gundy Road/Waverley Road), Camp 3 (Nundle Road/Barry Road), Central Hub A (New England Highway) and Central South Hub (Oxley Highway) accesses.
4. EnergyCo's CWO commitment that augmentation or use of camps for other projects would be 'a project modification' should be required as a condition here, given that camp capacity exceeds the stated peak on-site workforce.
5. Dubbo's point that the headcount excludes subcontractors and ancillary workers was never answered with numbers at CWO; it should be asked with numbers here.

SECTION **19**

Waste Rehabilitation and Long Term Responsibility

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 19

Waste Rehabilitation and Long Term Responsibility

Key issues we have found ...

Receiving facilities lack confirmed capacity	Existing facilities face capacity restrictions while disposal destinations and acceptance remain unconfirmed, risking competition with essential community waste disposal services.
Local waste burdens remain unclear	Construction totals lack annual, peak and council allocations, preventing communities from comparing additional waste with existing loads and available services.
Wastewater planning leaves major gaps	Camp sewage, concrete washout, contaminated runoff and treatment sludge need separate quantities, treatment pathways, receiving capacity and contingencies before approval.
Spoil reuse cannot be assumed	Unresolved contamination and asbestos risks leave disposal classifications uncertain, while proposed spoil and vegetation reuse lacks quantified destinations and contingencies.
Rehabilitation must restore productive land	Rehabilitation must restore soil, drainage, pasture and farm infrastructure against recorded baselines, with measurable standards, independent verification and funded corrections.
Closure costs need guaranteed funding	Removal obligations require a complete inventory, independently assessed costs, financial security and continuing responsibility through ownership changes and final closure.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >

SECTION **19**

Waste, Rehabilitation and Long Term Responsibilities

EXECUTIVE SUMMARY

The EIS does not demonstrate that the project's waste can be managed within the capacity of the facilities expected to receive it. It also leaves essential rehabilitation, removal and financial obligations to future planning. Approval should be withheld until these matters are resolved.

Again, if the scale of this project was of a managable size, these deferred design features would not pose a problem. The risk with this project is that the assumed capability is simply not there in many cases. This needs full assessment prior to determination to prevent cost blowout, timeline blowout, and the unmanageable escalation of impacts to community, economy and landscape.

Chapter 23 identifies substantial construction waste. Its separately quantified entries expressed in tonnes total 22,975 tonnes. Additional streams include 270,000 cubic metres of cleared vegetation, 10,000 cubic metres of spoil unsuitable for project use, 4,200 cubic metres of concrete waste, 120 megalitres of amenities wastewater, 170 kilolitres of oils and 4,400 conductor drums. These figures describe different streams and units; they do not establish a total landfill requirement. The missing information is the quantity allocated to each reuse, recovery, treatment and disposal pathway. [1, Table 23.2, pp. 765–766]

The assessment has six major deficiencies:

1. **Receiving capacity has not been demonstrated.** EnergyCo's regional study identifies constrained or unavailable facilities, while the EIS leaves final destinations and capacity confirmation to later work. Armidale Council has expressly restricted the project wastes its landfill can accept. [1, WM2, p. 773; 2, s. 4 and Appendix D; 9, pp. 6–7]

2. **The local increase over existing waste loads cannot be reliably assessed.** Chapter 23 provides construction totals without annual, peak-period, LGA or receiving-facility allocations. The regional baseline covers a different geographic area and an older project pipeline. [1, ss. 23.1–23.3; 2, foreword and s. 7.1]

3. **Important waste quantities remain uncertain.** Unresolved spoil classifications, naturally occurring asbestos risks and incomplete site investigations affect the amount of material requiring specialist management. [4, ss. 4.6 and 6.3–6.4]

4. **The liquid-waste assessment is incomplete.** The 120 ML estimate is described as amenities and ablutions wastewater. Construction-process liquids, treatment residuals, peak treatment demands and off-site acceptance require a reconciled assessment. [1, Tables 23.2–23.3; 3, WWC2, pp. 149–150]

5. **Regional solutions are not demonstrated delivery commitments.** The evidence must identify necessary upgrades, funding, responsible parties, operating dates and alternatives if facilities or reuse pathways are unavailable. [2, foreword and Chapter 14]
6. **Restoration and closure obligations remain insufficiently defined.** The EIS's general rehabilitation commitments do not establish the complete removal inventory, measurable restoration outcomes, financial protection and continuing responsibility needed to protect affected landholders. [5, s. 3.5 and s. 12.3.3; 8, s. 4.1]

The SEARs require waste to be identified, quantified and classified across all stages. Council advice specifically requests waste destinations, assessment of landfill capacity, decommissioning planning and financial security. These requirements must be answered with evidence and enforceable commitments. [6, pp. 1, 5; 8, ss. 4.1–4.2; 9, p. 6; 10, p. 2]

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2 | What the SEARs and agency advice require

The Planning Secretary's Environmental Assessment Requirements (SEARs) and agency advice identify the information needed to assess the project. The table below connects those requirements to the evidence still needed.

Requirement and source	Information still required
Waste throughout all project stages. The SEARs require identification, quantification and classification of waste and management measures developed in consultation with facilities and councils. Their project-description requirements expressly include decommissioning and rehabilitation. [6, pp. 1, 5]	A complete waste inventory covering construction, temporary-site removal, operation, major asset replacement and eventual closure, with management pathways and quantified residual disposal.
Excavation and off-site waste. EPA advice requires quantities and classifications for excavation, demolition and construction waste, including material removed off site and a lawful receiving-facility commitment. [7, s. 3.1, pp. 3–4]	A reconciled material balance, adequate classification evidence and viable destinations for the forecast quantities.
Storage contingencies. EPA advice requires plans for excessive stockpiling and dirty-water volumes exceeding available storage. [7, s. 6.3, p. 5]	Quantified storage limits, interruption scenarios, alternative destinations and controls when treatment, reuse or collection cannot operate.
Landfill capacity over the project life. Tamworth Council requests assessment of pressure on landfill licence capacity during construction, operation and decommissioning, including volumes, timing and disposal locations. [8, s. 4.2, p. 6]	Annual and peak allocations to facilities, existing intake, competing demand and available licensed and practical capacity.
Decommissioning and financial protection. Tamworth Council requests a rehabilitation and decommissioning plan, rehabilitation criteria and proposed financial security before construction. [8, s. 4.1, p. 6]	Defined removal and restoration obligations, an assessed cost and a binding funding mechanism.
A waste and decommissioning plan within the EIS. Armidale Council requests quantified lifecycle waste, material lifespans and recovery pathways, including recycling limitations. [9, p. 6]	A project-specific plan that demonstrates feasible recovery and disposal throughout the asset life.
Waste volumes and destinations. Uralla Council requests solid and hazardous waste quantities and destinations, management of regional capacity constraints, and wastewater treatment and disposal for camps and compounds. [10, p. 2]	Location-specific waste and wastewater arrangements supported by receiving-capacity evidence.

The EIS identifies procedures but does not complete the assessment of the quantities, destinations and capacity on which those procedures depend. Chapter 23 commits to classification, segregation, authorised contractors and lawful disposal. WM1 leaves the construction Waste Management Plan to detailed design, and WM2 leaves selection and confirmation of receiving facilities to subsequent work. [1, Tables 23.3, 23.5 and 23.6]

The central deficiency is the absence of a demonstrated, available waste-management solution for the assessed project. A later management plan can organise work within an assessed solution. It must not become the point at which the basic disposal burden, receiving infrastructure and associated impacts are first established.

PART A

Waste generation, regional capacity and unfinished planning

3 | Waste expected from the project

Construction quantities

Table 1 sets out the indicative construction quantities in Chapter 23. The estimates derive from the reference design and are to be confirmed during detailed design. [1, s. 23.3.1]

Waste stream	Construction estimate	Assessment issue
Cleared vegetation	270,000 m^3	No quantified allocation between timber recovery, mulch, other reuse and disposal.
Excavated spoil unsuitable for project use	10,000 m^3	This is not total excavation or a complete balance of material moved off site. Classification remains subject to investigation.
Concrete waste	4,200 m^3	Includes excess concrete, overpour, washdown and batching waste. Recovery and disposal quantities are not allocated.
Offcuts, excess materials and packaging	20,000 tonnes	Broad combined category without a material-by-material recovery and disposal breakdown.
Workforce general domestic waste	1,500 tonnes	Annual and location-specific quantities and destinations are not given.
Workforce organic waste	775 tonnes	Receiving processing capacity is not established.
Workforce recyclables	650 tonnes	Processing destinations and acceptance capacity are not confirmed.
Oils	170 kL	Treatment or recovery destinations and available capacity are not specified.
Grease	50 tonnes	Separately identified stream requiring a suitable management pathway.
Treated timber conductor drums	4,400 drums	No weight, return-to-supplier allocation or quantified residual disposal requirement.
Amenities and camp wastewater	120 ML	The estimate describes liquid/slurry from amenities and ablutions. Other liquid streams require reconciliation.
Miscellaneous chemicals and associated wastes	Minimal quantity	No numerical estimate for the listed chemical wastes.

> Table 1 - **Waste quantities identified in the EIS**
Source: [1, Table 23.2, pp. 765–766]. All quantities in this table are construction totals, not annual loads.

The separately quantified tonne-based rows sum to **22,975 tonnes**. This subtotal excludes the streams reported in cubic metres, liquid volumes and drum numbers. It must not be presented as total project waste or total landfill demand. A revised material balance must also prevent overlap between broad packaging estimates and separately listed items such as conductor drums.

Routine operational waste

The operational table identifies 15 tonnes a year of general waste, less than 500 kL a year of amenities wastewater and fewer than 10 conductor drums a year. Vegetation, transformer oils and several chemical or electrical wastes are described without a numerical quantity. These estimates do not establish major replacement-cycle or end-of-life waste volumes. [1, Table 23.4, pp. 769–770]

What the inventory must establish

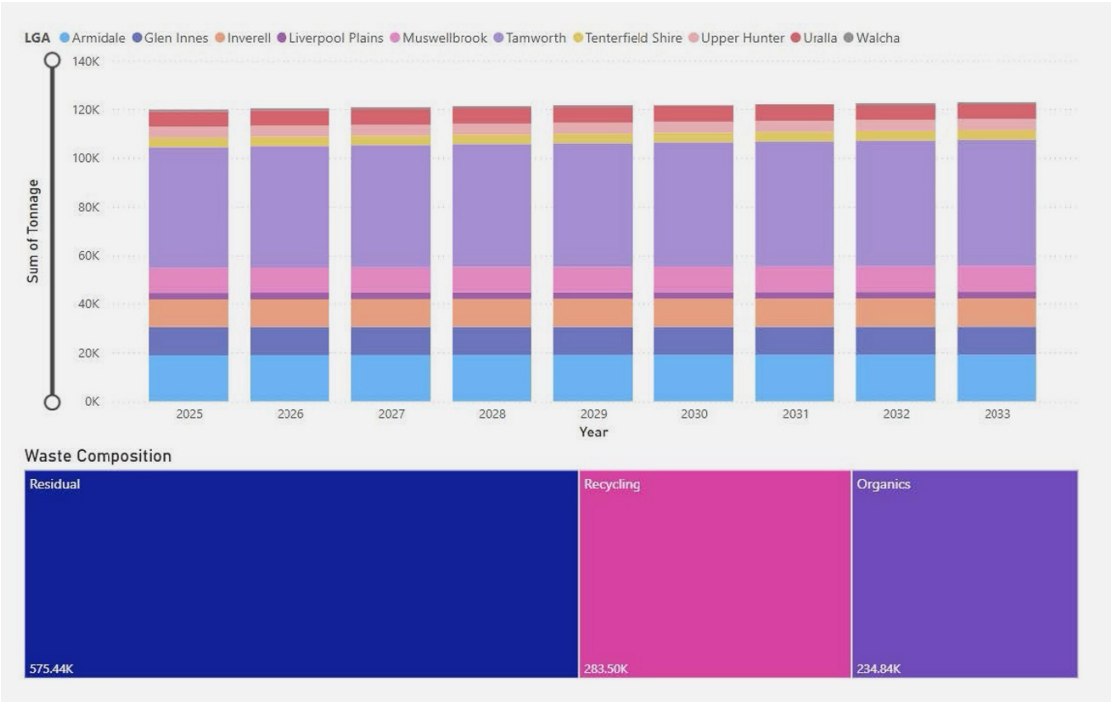
The EIS does not show how the construction totals translate into loads on individual councils, processors and landfills. It needs annual and peak-period quantities, locations of generation, classifications, and allocations between on-site reuse, off-site reuse, recycling, treatment and disposal. Each estimate must state its assumptions and reasonable uncertainty range.

The inventory must expressly cover enabling works, access-track and ancillary-site construction, removal of temporary facilities and treatment residuals. Where these are already included in a broader estimate, EnergyCo must identify the allowance and avoid double counting. Without that reconciliation, the community cannot assess the waste burden of the complete project.

4 | Existing waste loads and regional capacity

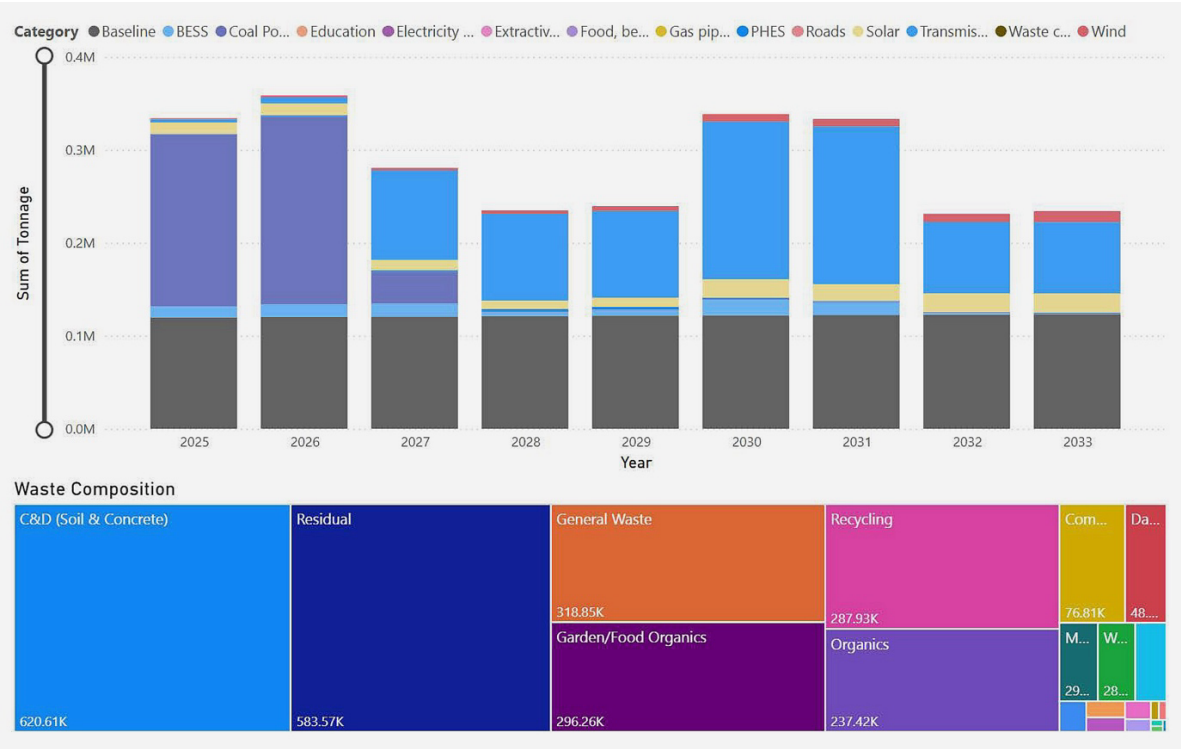
The regional baseline

The regional waste study estimates existing resident and ordinary commercial waste at approximately **120,000 tonnes a year**. Its baseline includes residual waste, recycling and organics and excludes sewage. [2, s. 7.1, pp. 69–70]



> Figure 1 - **Baseline Waste - Waste Resource Study p75**

Figure 35 shows an upper-scenario peak of approximately 360,000 tonnes a year, about three times that baseline.



It is important to note three things from the above chart;

1. Base case waste load is even in its quantity from year to year. LGA's can manage for this annual load.
2. The additional waste is of an overwhelming scale, compared to base case, in addition to being erratic in its quantity.
3. No information is given to allocate waste to each LGA. This study needs to be completed.

This base case covers the larger region including centres such as Muswellbrook, Tamworth, Inverell and Glen Innes. However, it is likely to be the smaller centres, such as Uralla and Walcha, that do not have the capacity, that will carry the burden of the waste.

The regional baseline also covers ten LGAs rather than Chapter 23's eight-LGA study area. It includes Glen Innes, Inverell and Tenterfield, but excludes Singleton. Its project pipeline is based on November 2024 information. These differences must be reconciled before the forecasts are used to claim that this project's local waste impacts are acceptable. [2, foreword and Table 1, p. 16; 1, s. 23.1, p. 761]

A reliable percentage increase for each affected council is unable to be calculated from Chapter 23. Its whole-construction totals have not been matched to annual local baseline loads or facility allocations.

EnergyCo must provide that comparison in consistent units, areas and time periods.

Existing facility constraints

The regional study identifies substantial constraints at facilities listed in or near the project area. Table 2 records the study's findings, which require current operator confirmation.

Facility	Annual limit reported by the study	Constraint reported by the study
Walcha	1,500 tonnes	No capacity for additional waste; significant REZ commercial and construction waste cannot be accommodated.
Uralla	3,000 tonnes	At its annual licensed limit and fewer than three years of remaining operating life at the study date.
Armidale	15,000 tonnes of general solid waste	At its annual limit. Proposed additional capacity requires planning and licensing changes.
Scone	7,000 tonnes	At its annual limit and no capacity for additional waste.
Aberdeen	5,000 tonnes	No capacity to receive and process additional waste.
Murrurundi and Merriwa	Historical licence figures do not establish available landfill capacity	Both landfills are reported closed and operating as transfer stations.

> Table 2 - **Existing constraints reported in EnergyCo's regional waste study**

Sources: [2, ss. 4.1–4.2, especially pp. 25, 29 and 39; Appendix D, pp. 147–148 and 156–158]. Annual limits are not measures of spare capacity or current waste production.

Walcha's estimated 40-year landfill life relates to existing domestic filling rates. The same study says it cannot receive significant REZ commercial, industrial or construction waste. The long domestic operating life does not demonstrate a capacity to absorb this project. [2, s. 4.1.10, p. 29; Appendix D, p. 158]

Armidale's amended advice makes the restriction explicit: its landfill cannot accept project or REZ waste, apart from certified virgin excavated natural material, paper and cardboard, and commingled recycling. A facility appearing in an EIS list is therefore not evidence that it will accept the proposed loads. [9, pp. 6–7]

Facility information must be reconciled

Chapter 23 lists landfilling at Murrurundi and Merriwa, while the regional study says their landfills are closed. Chapter 23 lists asbestos acceptance at Scone, while the study's main text says Upper Hunter asbestos is accepted only at Aberdeen. These differences require confirmation of present operating status and acceptance arrangements. [1, Table 23.1, pp. 764–765; 2, s. 4.1.8, p. 29]

The study identifies 60 facilities, including 41 transfer stations primarily serving domestic waste and generally unsuitable for REZ commercial volumes or types. The EIS must establish the suitability and spare capacity of actual destinations, including any downstream landfill or processor reached through a transfer station. [2, s. 4.2, p. 30]

5 | Solid waste recovery, reuse and disposal

Receiving facilities and available capacity

The EIS has not completed the connection between the waste generated and the facilities expected to manage it. WM2 commits to later selection of facilities and consultation about capacity. It does not provide annual allocations, confirmed acceptance or a quantified contingency destination for each material stream. [1, WM2, p. 773]

The receiving-facility assessment must state existing intake, licensed and consented limits, actual processing capability, remaining landfill space, other committed demand and the capacity available during the project's peak periods. Required upgrades must have identified approvals, funding, delivery dates and responsible parties.

Without this assessment, households and existing businesses face the risk of reduced access to disposal services, earlier exhaustion of landfill space and additional transport or infrastructure costs. Those consequences must be assessed before the waste solution is accepted.

Excavated material and vegetation

The 10,000 m^3 unsuitable-spoil entry must be reconciled with the project's full excavation and reuse balance. Chapter 23 describes potential natural-material reuse and testing of suspect spoil, but does not quantify all excavated material, its location, the timing of reuse or the residual off-site requirement. [1, Tables 23.2–23.3, pp. 766, 768]

For the 270,000 m^3 of vegetation, the EIS describes possible timber reuse, firewood, mulch and licensed disposal of weed-contaminated material. State Forest timber recovery is subject to further discussion. These options require quantified allocations and demonstrated users or processing capacity. [1, Table 23.3, p. 767; WM3, p. 773]

The assessment must identify where material will be stored, processed and applied, the quantities each use can absorb, and what happens when reuse is unavailable. Landholder agreement and the suitability of receiving land must be established. Material must not accumulate on properties because an assumed market or use fails to materialise.

Construction materials and recovery targets

The 20,000-tonne combined estimate for offcuts, excess materials and packaging needs to be separated into practical streams such as metals, timber, plastics, cardboard and mixed residual waste. The assessment must then identify processors, acceptance conditions and realistic recovery rates. [1, Table 23.2, p. 766]

The EIS states that EnergyCo has set waste-reduction and recycling targets for the network operator. It does not disclose their numerical values in that passage or in Chapter 23. The targets, calculation methods, relevant waste streams, exclusions and compliance arrangements must be published. [5, Table 2.3, p. 32; 1, s. 23.5]

A recovery target requires a deliverable pathway. Procurement, supplier take-back, segregation and processing arrangements must support the claimed outcome. The residual disposal assessment must allow for contamination, rejected loads and recovery rates below the target.

6 | Contaminated spoil and special wastes

Investigations affect the disposal burden

Technical Report 19 contains a conceptual site model, sampling, classification procedures and commitments to further investigation. The outstanding issue is the quantity and classification of material that those investigations will require the project to manage.

At BH123, nickel exceeds a threshold which the report says would result in hazardous-waste classification if no further analysis occurred. Further leachability testing may support classification as general solid waste. Until that testing is completed, the final classification and affected volume remain unresolved. [4, s. 6.3.2, p. 57]

The report also identifies a naturally occurring asbestos risk band between Hanging Rock and Glenrock intersecting approximately 3 km of alignment, including towers and access roads. Targeted investigation and a management plan are required where relevant disturbance cannot be avoided. The mapped risk must be reflected in waste estimates and disposal contingencies. [4, s. 4.6, p. 37; Table 11-1, p. 92]

Intrusive investigation had not been undertaken at Camps 1 and 4, including the Central South Hub camp, and investigation at Camps 2 and 5 was limited. Several potential contamination sources, including livestock dips, fill, stockpiles and dumping areas, were not comprehensively located or mapped. [4, ss. 1.2.2, 6.3.1 and 6.4, pp. 11, 57–58]

The disposal assessment must account for these known uncertainties. It must provide expected and credible upper-bound quantities by classification, appropriate receiving pathways and the effect of specialist disposal on storage, transport and cost. An assumption that excess soil can be reused cannot resolve an untested contamination risk.

Classification before disturbance and reuse

The report requires further assessment of unavoidable disturbance in areas with moderate or greater potential contamination impacts and targeted asbestos investigation. These commitments need clear completion points before relevant disturbance. [4, Table 11-1, pp. 90–93]

The findings must update the waste inventory and receiving-capacity assessment. Contaminated material must be segregated from clean fill and rehabilitation material. Reuse must be suitable for its receiving land and lawful under the applicable classification or recovery arrangements. Unexpected-find procedures must supplement, rather than delay, the investigation of already identified risks.

Contaminated water and dam sediments also require attention where works affect dams or groundwater. Their expected quantities and management pathways must be identified separately from the amenities wastewater estimate. [4, ss. 8.3.2–8.3.3, pp. 72–73]

7 | Wastewater generation, treatment and disposal

The liquid-waste balance is incomplete

Table 23.2 describes 120 ML of liquid waste and slurry from amenities and ablutions. Table 23.3 refers to sewage and concrete washouts and proposes camp treatment plants, possible reuse and off-site transport of remaining wastewater. These descriptions do not provide a complete quantified balance of sewage, construction-process liquids, reuse and residual disposal. [1, pp. 766, 769]

The regional wastewater study identifies construction-process wastewater as an outstanding information requirement. Examples include contaminated runoff and wheel washes. Some streams may disrupt sewage-treatment processes and require alternative treatment. [3, WWC2, pp. 149–150]

EnergyCo must demonstrate the treatment requirement for each liquid stream. This includes total and peak daily volumes, pollutant loads, treatment standards, reuse demand, storage and residual disposal. Concrete washout and other process water cannot simply be assumed suitable for the same pathway as camp sewage.

Capacity must be demonstrated for the project

Table 3 shows selected results from the regional study. These are modelled utilisation rates for broader REZ development, using average dry-weather flows. They are not measured current spare capacity or the transmission project's individual contribution.

LGA	Modelled baseline utilisation	Modelled utilisation with REZ development
Walcha	24%	26%
Uralla	52%	105%
Tamworth	98%	99%
Upper Hunter	97%	98%
Armidale	89%	91%

Table 3 - **Selected regional wastewater treatment capacity comparisons**

Source: [3, Table 7-2, p. 124]. The displayed REZ percentages are the same in the study's Stage 1 and Stage 2 columns for these LGAs.

The model shows Uralla exceeding assumed capacity and several systems operating close to it. It does not show Walcha exceeding its adopted treatment capacity. However, the study excludes wastewater-network constraints and peak wet-weather flows, lacks plant-efficiency information and assumes no on-site treatment at project sites. The EIS now proposes camp treatment plants. The model must therefore be reconciled with the current design and verified operating capacity. [3, pp. 121–124 and Appendix G, p. 171]

Camp plants, residuals and outstanding investigations

The assessment must specify each camp plant's throughput, treatment performance, storage, reuse area or demand, and response when weather or water quality prevents reuse. It must quantify screenings, sludge and other treatment residuals and identify lawful receiving facilities. The EIS describes treatment and residual removal, but Chapter 23 does not provide those quantities and receiving allocations. [5, pp. 66, 727; 1, Table 23.3, p. 769]

The regional study identifies seven further actions, WWC1–WWC7. They address camp siting and networks, process-wastewater quantities, practical plant capacity, treatment solutions, tankering, verification of Liverpool Plains capacity and extreme wet-weather flows. EnergyCo must publish the status and findings of each action and show how they have been incorporated into the project. [3, Table 8-6, pp. 149–151]

8 | Waste transport, storage and contingency arrangements

Transport follows the disposal decision

The EIS's proximity list does not establish haulage routes from individual work fronts or camps. Until destinations and quantities are allocated, the waste assessment cannot demonstrate the corresponding route-specific traffic burden. [1, Table 23.1 and WM2]

The transport schedule must include residual construction waste, vegetation, specialist spoil, wastewater, treatment residues and material sent for recycling. It must show vehicle capacities, loaded and empty movements, peak days, intermediate transfers and alternative destinations. The totals must reconcile with the traffic assessment and identify any additional road, safety, noise or dust measures.

Storage must have limits and a practical alternative

Chapter 23 provides ordinary controls for segregation, labelled storage, bunding and authorised collection. The assessment still needs maximum storage quantities, holding periods and interruption scenarios for the volumes generated by this project. [1, Tables 23.3 and 23.6]

EPA advice expressly requires contingencies for excessive stockpiles and dirty water exceeding available storage. The project must show how it will manage rejected loads, transport interruptions, unavailable processors, failed treatment and periods when treated wastewater cannot be reused. [7, s. 6.3, p. 5]

Temporary storage must not become the default response to an unavailable disposal pathway. Site limits, inspection requirements, removal triggers and assessed alternative destinations are needed before the relevant facilities operate. The costs and responsibility for those alternatives must remain with the project. Emergency plans should also identify how waste from foreseeable spills, fires or equipment failures will be contained, classified and removed, including contaminated firewater and damaged materials.

9 | Cumulative waste pressures, infrastructure and funding

The regional study establishes the need for coordinated waste planning, but its forecasts use an older project pipeline and generic transmission waste assumptions. The EIS must reconcile that work with the current design, construction program, project list and verified facility capacities. [2, foreword, ss. 6.1 and 6.3.2.9, pp. 59–60; 5, Table 2.3, p. 32]

The assessment must prevent several projects from each relying on the same apparent spare capacity. Annual and peak-period allocations should account for existing community demand and other committed or reasonably foreseeable developments. Where infrastructure is insufficient, the solution must identify the facility, operator, approvals, funding and commissioning date.

The regional study proposes waste frameworks, updated facility information, service agreements, reverse logistics and monitoring. Its foreword expressly states that opportunities are not commitments or guaranteed actions. The EIS's cumulative-waste section acknowledges potential capacity exceedance and ongoing consultation about facilities and destinations. [2, foreword and Chapter 14; 5, s. 24.2.2.19, p. 812]

The assessment needs a funded delivery program for the capacity on which the project relies. Where an upgrade or new service cannot be delivered in time, EnergyCo must demonstrate an alternative and assess its impacts. Councils and existing businesses must not lose essential capacity because a project has assumed that regional coordination will produce a solution later.

Armidale Council specifically rejected reliance on broad coordination statements or future strategies without explaining who would act and with what authority. That concern should be answered through named responsibilities, enforceable arrangements, reporting and intervention triggers. [9, p. 5]

PART **B**

Rehabilitation, end of life waste and long term responsibility

10 | Rehabilitation and end of life obligations

The EIS commits to rehabilitating temporary construction areas, undertaking pre-condition assessments and preparing property management plans. It also anticipates an operating life of around 50 years, potentially longer with maintenance and upgrades, and says a detailed decommissioning and rehabilitation plan would be prepared before final closure. These commitments establish an intention to rehabilitate. They do not settle the restoration standards, removal obligations, funding and long-term responsibilities that affected landholders need to understand before approval. [5, s. 3.5, p. 143]

10.1 Rehabilitation after construction and closure of temporary facilities

Closure of temporary facilities is part of the construction program. Camps, compounds, laydown areas, batching facilities and temporary services will require dismantling, waste removal and rehabilitation as construction finishes. Section 3.5 provides for temporary-site decommissioning before construction is completed and for unused access tracks to be rehabilitated or retained in consultation with landholders. [5, s. 3.5, p. 143]

The assessment needs to show what this work involves at each site. It should identify the buildings, concrete, hardstand, underground services, wastewater infrastructure and contaminated materials to be removed; the associated waste quantities and destinations; and the timing of reinstatement. The construction waste inventory must make clear whether these removal and clean-up activities are included.

Section 12.3.3 says temporary facilities would be restored to their former use, subject to approval conditions and property plans, unless otherwise requested by the landholder or located on freehold land acquired by EnergyCo. Acquisition does not establish an acceptable final condition for that land. The intended future use and rehabilitation obligations for acquired camp and ancillary sites must also be specified. [5, s. 12.3.3, pp. 496–497]

10.2 Restoration of agricultural land and environmental values

Returning land to a broad use is not the same as restoring its agricultural productivity. A paddock can return to grazing while supporting lower stock numbers because of compaction, poor drainage, damaged soil structure, weeds or reduced pasture establishment. Rehabilitation must be assessed against the condition and productive function of the land before disturbance.

The EIS identifies approximately 2,233 hectares of agricultural land affected during construction. It proposes pre-condition assessments and property-specific rehabilitation arrangements. That baseline must record the characteristics needed to demonstrate recovery, including soil condition, drainage, pasture or cropping performance, fencing, water infrastructure and existing biosecurity conditions. [5, s. 12.3.3, pp. 496–497; Table 12.7, LP2, p. 507]

The EIS commits to property-infrastructure adjustments at no cost to landholders and to repairing construction damage. Those commitments should expressly cover the functional restoration of affected dams, bores, pumps, pipelines and stock-watering systems, with agreed performance standards and a process for addressing defects that emerge after construction. [5, s. 12.3.2, p. 496; Table 13.5, AG4, p. 543]

Organic properties require specific protection. The EIS excludes genetically modified plants from rehabilitation and provides for consultation with organic producers about property-specific risks. The resulting plans must also address imported soil, residues, weed-control products and any testing or corrective work needed to protect certification. [5, s. 13.3.5.5, p. 535; Table 13.5, AG5, p. 544]

Contaminant screening must reflect the receiving land use. Technical Report 19 considers some soils suitable for reuse under industrial or public-open-space scenarios. That finding does not establish agricultural productivity or suitability for every rehabilitation site. Vegetation restoration must likewise specify the required species, establishment standards and erosion-control outcomes, beyond the future procedures identified in the EIS. [4, s. 8.3.1, p. 71; 5, Table 7.10, B2, p. 279]

10.3 Waste from asset replacement and eventual decommissioning

The waste assessment must cover the infrastructure that will be replaced during operation and removed when it is no longer required. The project description anticipates replacement or upgrading of energy-hub components and an operating life that may extend beyond 50 years. Chapter 23 lists routine maintenance waste, but its operational table does not provide an inventory of major replacement cycles or an end-of-life waste estimate. [5, ss. 3.4.2–3.5, pp. 142–143; 1, Table 23.4, pp. 769–770]

The assessment should quantify the principal materials in towers, conductors, substations, transformers, batteries, cables, foundations and associated infrastructure. It should then distinguish material expected to be replaced during operation, material removed at final closure and material proposed to remain in the ground. Waste classifications, recovery opportunities and residual disposal requirements must accompany those estimates.

Future waste technology and asset life will change. That does not prevent EnergyCo from providing a present-day inventory, realistic recovery assumptions and an obligation to review the assessment as the assets change. It is the starting point for estimating closure costs and avoiding an unfunded waste liability.

This is supported by the SEARs requirement to quantify waste throughout all project stages and by Tamworth Regional Council's request for landfill-capacity assessment across construction, operation and decommissioning, including waste volumes, timing and disposal locations. [6, pp. 1, 5; 8, s. 4.2, p. 6]

10.4 What will be removed and what will remain

Section 3.5 estimates that final decommissioning, if required, would take around two years. It leaves the detailed plan until that stage. The generic commitment does not explain the extent of tower, substation and foundation removal, the treatment of buried infrastructure or the final landform and drainage arrangements. [5, s. 3.5, p. 143]

The EIS should establish a component-by-component removal schedule and a defined final condition for affected land. Any proposal to leave foundations, cables, drainage structures or other infrastructure in place must identify its extent, constraints on future land use and continuing inspection or maintenance obligations. Retention must be justified and agreed through a clear process; it must not become the default because removal costs have not been funded.

The social assessment records concern about complete infrastructure removal, productive land use and residual environmental impacts. It reduces the assessed decommissioning uncertainty from High to Negligible using community engagement and continuing maintenance, upgrading or replacement as management measures. Those measures do not establish enforceable removal or restoration obligations. [5, Table 10.8, p. 405]

Landholder agreement to retain a useful access track must be specific. It must not transfer responsibility for unrelated infrastructure, concealed contamination or failed rehabilitation.

10.5 Responsibility, funding and financial security

The approval must identify who remains responsible for rehabilitation, waste removal and remediation throughout construction, operation, transfer of ownership and final closure. Landholders and councils need an enforceable point of responsibility if contractors leave, ownership changes or restoration fails.

Tamworth Regional Council specifically requested a Decommissioning and Rehabilitation Plan, rehabilitation criteria and proposed financial security or a decommissioning bond before construction. The EPA's amended advice also states that it may require financial assurance as a licence condition. The EIS's general commitment to a future closure plan does not resolve the amount, form, timing or availability of that protection. [8, s. 4.1, p. 6; 7, p. 2; 5, s. 3.5, p. 143]

Financial protection should be based on an independently assessed cost of completing the outstanding work, including waste transport and disposal, infrastructure removal, soil and water remediation, rehabilitation, monitoring and corrective action. It should allow for uncertainty in contamination and recovery costs and be reviewed as the project, costs and liabilities change. Speculative future scrap values should not be relied upon to fund essential obligations.

Responsibility and security must continue through ownership or operator changes. Release of security should depend on verified completion, with sufficient protection retained for defects or contamination that become apparent during monitoring.

10.6 Rehabilitation standards, verification and long term monitoring

Property Specific Management Plans can record local requirements, but they need a consistent minimum restoration standard across the project. LP2 and the agricultural mitigation measures provide for pre-condition assessments, rehabilitation processes and property-specific plans. They do not set the measurable agricultural and environmental completion standards sought in this submission. [5, Table 12.7, LP2, p. 507; Table 13.5, AG3, pp. 541–543]

Before relevant disturbance, each site should have an agreed baseline, rehabilitation objective and completion criteria covering, as applicable:

- soil condition, drainage and recovery of agricultural productive capacity;
- stable landforms, erosion control and established vegetation;
- restored property and water infrastructure, and effective weed and biosecurity controls;
- removal or lawful retention of infrastructure and waste, with contamination validation where required.

Each obligation needs a completion date, an inspection and reporting process, and a defined response if the standard is not achieved. Verification should include appropriate independent expertise and affected landholder participation. Monitoring must continue long enough to test recovery through relevant growing seasons and rainfall conditions. Failed revegetation, renewed erosion, drainage defects or contamination must trigger funded corrective work and further verification.

The EIS describes rehabilitation as an outcome but leaves central questions about delivery unresolved. Approval must secure what will be removed, the condition in which land will be left, the standards by which recovery will be judged, and the funding and responsibility for achieving those standards. Those protections must be established before disturbance and remain enforceable until the obligations are fulfilled.

11 | Summary of deficiencies and risks to the community

The EIS identifies waste streams and standard management procedures, but leaves the practical capacity solution and significant restoration obligations unresolved. The resulting risks extend from the construction period to final closure.

Deficiency	Community or landholder consequence	Required response
No annual and local allocation of project waste	Additional pressure on local services cannot be assessed against existing demand.	Consistent baseline comparisons, annual quantities and peak receiving loads.
Unconfirmed destinations and constrained facilities	Loss of community capacity, longer haulage and unfunded infrastructure demands.	Demonstrated acceptance capacity, funded upgrades and viable alternatives.
Incomplete spoil classification and liquid-waste balances	Unexpected specialist disposal, storage and transport requirements.	Investigation, quantified allowances, appropriate treatment and disposal capacity.
Unproven recovery assumptions and storage contingencies	Accumulation of material when a proposed use, processor or treatment route fails.	Quantified recovery pathways, storage limits and assessed contingencies.
Undefined replacement and closure waste	Future disposal requirements and removal costs remain uncertain.	Lifecycle inventory, removal commitments and regularly updated closure estimates.
Incomplete restoration criteria and financial protection	Reduced land productivity, persistent defects and costs transferred to landholders or councils.	Measurable outcomes, continuing liability, independent verification and adequate security.

> Table 4 - **Deficiencies, consequences and required protection**

These findings are supported by the evidence in Sections 3–10. They require resolution during assessment and enforceable obligations before the relevant activities commence. A future plan must implement an assessed solution and defined outcomes, rather than postpone the decisions that determine the project's impacts.

12 | Questions and demands

EnergyCo must provide enough information before determination to establish a feasible waste strategy and assess its impacts. Any approval must then require final arrangements, operating plans and necessary infrastructure to be in place before the relevant work starts.

12.1 Complete inventory and baseline comparison

Question: What waste will be generated, where and when?

Demand: Before determination, provide a single inventory covering enabling works, construction, camp and compound removal, operation and asset replacement. Separate each stream by quantity, classification, year and LGA, identify peak months, and state assumptions and uncertainty ranges. Compare annual project additions with existing annual waste loads in the same area and units. Keep transmission-project quantities separate from forecasts for the wider REZ.

12.2 Confirmed receiving capacity

Question: Which facilities can receive the forecast waste?

Demand: Before determination, identify proposed receiving facilities and demonstrate their ability to accept each classification and forecast peak load, allowing for existing customers and other projects. Distinguish licensed throughput, actual processing capacity and remaining landfill space. Before the relevant work starts, secure written acceptance arrangements and a viable alternative if a nominated facility becomes unavailable. A list of nearby facilities is insufficient.

12.3 Excavated material and vegetation reuse

Question: How much excavated material and vegetation can actually be reused?

Demand: Provide a reconciled material balance showing quantities generated, reused on the project, transferred for beneficial use, stockpiled and disposed of. Identify the location, timing and capacity of proposed uses, including any processing needed. Reconcile surplus earthworks with the waste inventory. Before determination, assess a credible disposal alternative for material whose reuse has not been demonstrated, including its transport and environmental impacts.

12.4 Contamination investigation and classification

Question: What investigations are needed to classify and manage contaminated material?

Demand: Before determination, identify unresolved contamination and naturally occurring asbestos risks, the likely waste streams and credible quantity ranges, and demonstrate that suitable treatment or disposal pathways exist. Complete the necessary site investigations, classification, remediation design and validation requirements before affected ground is disturbed. Explain how contaminated material will be segregated and prevented from entering clean fill, rehabilitation material or offsite reuse streams.

12.5 Wastewater treatment and residuals

Question: How will sewage and construction-process wastewater be treated?

Demand: Reconcile the 120 ML amenities and ablutions estimate in EIS Table 23.2 with camp occupancy and construction duration. Separately quantify washdowns, concrete washout and contaminated runoff. Before determination, demonstrate treatment feasibility using peak daily flows and pollutant loads, onsite plant capacity, reuse demand, residual effluent and sludge quantities. Assess wet-weather storage and plant-failure contingencies. Confirm receiving-plant acceptance, any required upgrades and operating arrangements before wastewater is generated.

12.6 Waste transport and road impacts

Question: What traffic will waste management add to local roads?

Demand: Before determination, quantify waste and wastewater haulage by route, construction stage and peak day, stating vehicle capacities and counting loaded and empty movements consistently. Include transport to distant specialist facilities and transfers between stockpiles, processing sites and final destinations. Assess cumulative road, safety, noise and dust impacts. Show how these movements reconcile with the traffic assessment and identify who funds any necessary road measures.

12.7 Storage limits and contingencies

Question: Where will waste be stored while awaiting reuse, treatment or removal?

Demand: Identify proposed storage locations, maximum quantities and holding periods before determination where their impacts affect the assessment. Address drainage, sediment and leachate control, dust, fire, odour, weeds and separation of incompatible materials. Before use, establish operating limits, inspection requirements and removal triggers. Provide contingencies for rejected loads, interrupted transport and unavailable receiving facilities so temporary storage does not become an uncontrolled disposal solution.

12.8 Cumulative capacity and funded upgrades

Question: How will cumulative demand and necessary upgrades be addressed?

Demand: Update the regional assessment for the current project design, construction programme, other committed or reasonably foreseeable projects, and verified facility capacities. Explain what has been completed under the regional waste study and wastewater recommendations WWC1–WWC7. Identify required upgrades, responsible parties, funding and delivery dates. Before determination, demonstrate a deliverable capacity solution; before the relevant waste is generated, have that capacity commissioned and available without displacing essential community services.

12.9 The closure inventory

Question: What material will remain at the end of the project's operating life?

Demand: Before determination, provide an indicative inventory of towers, conductors, foundations, electrical equipment, oils, buildings and ancillary infrastructure, with quantities and likely recovery or disposal pathways. Identify material proposed to remain in the ground and assess the consequences. Establish a process for updating the inventory and closure costs as the design and assets change. Future refinement must not replace an initial assessment of the expected closure obligations.

12.10 Removal and restoration standards

Question: What removal and restoration outcomes will be guaranteed?

Demand: Before determination, establish minimum standards for temporary-site rehabilitation and eventual closure, including infrastructure removal, clean-up, stable landforms, drainage and restoration of affected agricultural land. Set measurable criteria for contamination, erosion, compaction, soil condition and pasture establishment, with comparison against recorded pre-construction conditions. Resolve property-specific methods before disturbance. Any retained infrastructure must have an identified purpose, assessed consequences and the landholder's informed agreement; retention must not transfer an unwanted liability.

12.11 Responsibility and financial security

Question: Who will pay if rehabilitation fails or the operator cannot meet its obligations?

Demand: Before determination, identify the parties responsible for construction waste, contamination, temporary-site restoration, decommissioning and post-closure defects. Provide an independently reviewed cost estimate and propose enforceable financial security covering those obligations. Establish security before construction and maintain it until the secured obligations are verified as complete. Specify how it will be reviewed and adjusted, and who can access it if obligations are not met. Ownership changes must preserve responsibility, funding and the ability to require corrective work.

12.12 Verification, monitoring and reporting

Question: How will compliance and rehabilitation success be demonstrated?

Demand: Before determination, specify measurable recovery and disposal commitments, rehabilitation completion criteria, independent verification and corrective-action obligations. Require records of quantities, classifications, destinations and acceptance, with regular public reporting. Establish monitoring periods suited to the risks, landholder reporting arrangements and clear triggers for further work. Final operating plans must be approved before the relevant activity begins, and material changes to assessed waste volumes, destinations or impacts must receive further assessment and public scrutiny.

> POSITION SOUGHT

Approval should be withheld until EnergyCo demonstrates that the project's waste can be lawfully and practically managed, that receiving and treatment capacity is sufficient, and that the resulting environmental and community impacts have been assessed. A future Waste Management Plan cannot substitute for this evidence.

The assessment must cover all material waste streams, including surplus spoil, contaminated material, process wastewater, temporary-facility removal, asset replacement and eventual decommissioning. Material new information about quantities, destinations, treatment infrastructure or impacts should be publicly exhibited before determination so affected councils, landholders and communities can respond.

Any approval must require final acceptance arrangements, operating plans and funded infrastructure upgrades to be completed before the corresponding work generates waste. It must also establish enforceable minimum removal and rehabilitation standards, clear responsibility, independent verification and adequate financial security.

Detailed closure methods can be updated as the infrastructure ages. The obligations, minimum outcomes and funding mechanism must be established upfront and maintained throughout the project's life. Landholders and councils must not inherit the cost of failed rehabilitation, abandoned infrastructure or unresolved waste.

Source references

Page references are the printed page numbers in each source. References to the regional studies identify their modelling and assessment findings; those figures are not a substitute for updated operator-confirmed capacity.

[1] EnergyCo. New England REZ Network Infrastructure Project Environmental Impact Statement, 2026. Chapter 23 Waste management, printed pp. 760–774. Tables 23.1–23.6 and measures WM1–WM5. Official source

[2] MRA Consulting Group for EnergyCo. New England REZ Waste Management and Circular Economy Study. Public version released December 2025. Foreword, Chapters 4, 6–8 and 14, and Appendix D. Official source

[3] Jacobs for EnergyCo. New England REZ Water and Wastewater Security Study. Public version released December 2025. Chapter 7, Table 7-2, Table 8-6 and Appendix G. Official source

[4] Aurecon. Technical Report 19 Contamination Impact Assessment, final revision 4 September 2026. Sections 4.6, 6.3–6.4, 8.3 and Table 11-1. Official source

[5] EnergyCo. New England REZ Network Infrastructure Project Environmental Impact Statement, 2026. Full EIS: Table 2.3; sections 3.4–3.5, 12.3 and 13.3; Tables 7.10, 10.8, 12.7 and 13.5; and section 24.2.2.19. Source 1 is an extract from this EIS. Official source

[6] NSW Department of Planning, Housing and Infrastructure. Amended Planning Secretary's Environmental Assessment Requirements, SSI-74175972. Issued 7 April 2026, pp. 1 and 5. Official source

[7] NSW Environment Protection Authority. Amended advice on the New England REZ Transmission Project, 22 January 2026. Financial assurance at p. 2; construction waste at pp. 3–4; waste and contingency requirements at p. 5. Official source

[8] Tamworth Regional Council. Amended advice, 12 March 2026. Sections 3.3, 4.1 and 4.2, particularly p. 6 of 9 on decommissioning, rehabilitation, financial security and landfill capacity. Official source

[9] Armidale Regional Council. Amended advice, 11 February 2026. Cumulative coordination and monitoring at pp. 4–5; waste and decommissioning plan and landfill restrictions at pp. 6–7. Official source

[10] Uralla Shire Council. Amended advice, 4 February 2026. Local capacity and place-based impacts at p. 1; wastewater, waste quantities, destinations and regional disposal constraints at p. 2. Official source

SECTION **20**

Visual Impacts

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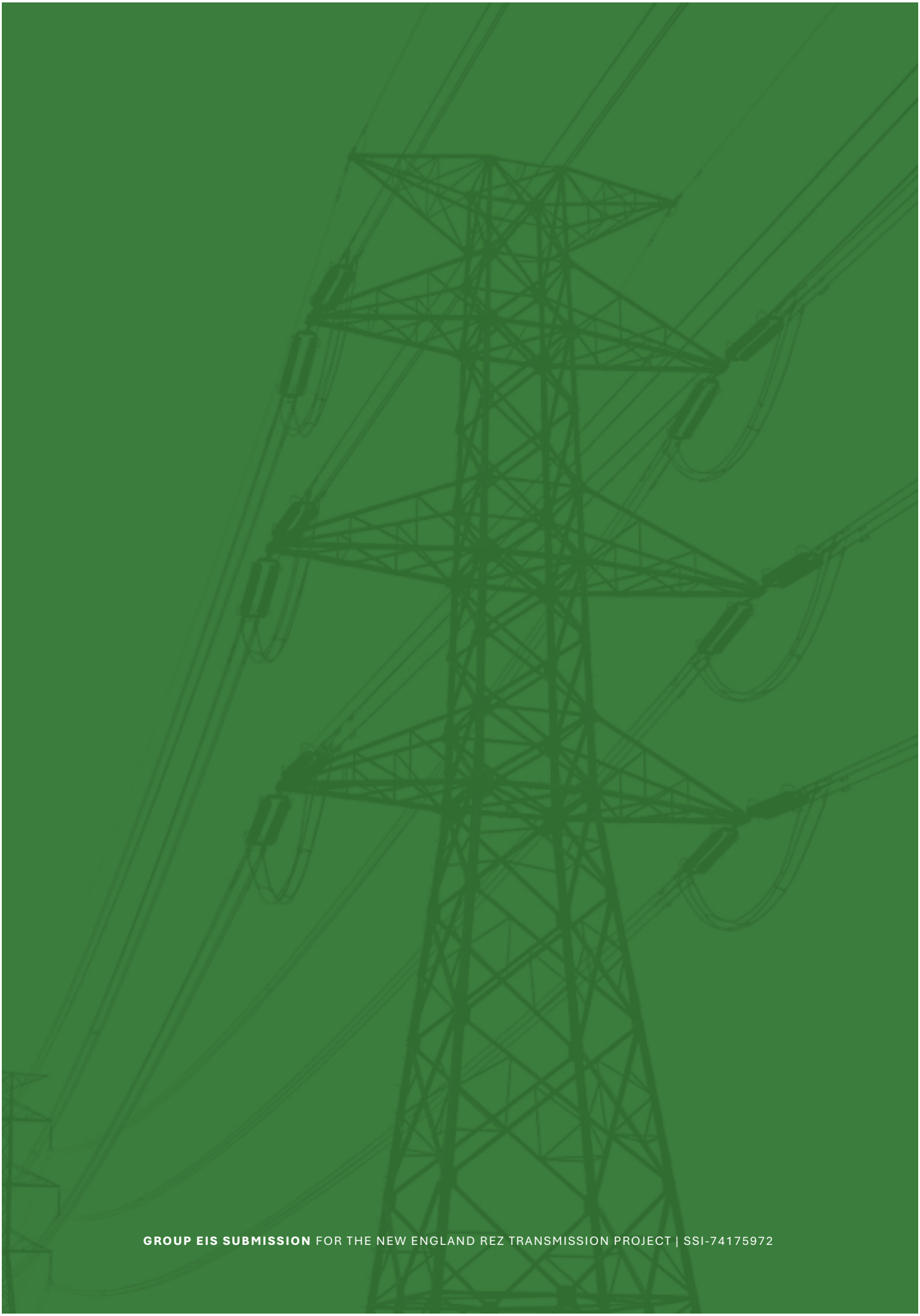

GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION **20**

Visual Impacts

Key issues we have found ...

100 homes deliberately excluded	The assessment excludes 100 homes on properties hosting the line, leaving their visual impacts unmeasured and denying equivalent visual protections.
Desktop downgrades remove mitigation requirements	Twelve homes were downgraded without site visits, removing mitigation requirements; contradictory ratings elsewhere expose further failures in the assessment process.
The wires count for nothing	The visual magnitude calculation ignores conductors and towers beyond 1,527 metres; dwelling assessments disregard what farmers see across working properties.
Blocking views is not mitigation	Proposed screening can replace valued rural outlooks with trees, relying on unsupported growth assumptions and no binding commitment to maintenance.
Full landscape impacts remain unassessed	Unapproved wind projects are excluded, local night skies neglected and pastoral landscapes left unrated, obscuring the scale of visual impacts.
Visualisations show the wrong community	EnergyCo produced community visualisations for Woolomin, now outside the route; the EIS records no equivalent illustrations for communities actually affected.

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SECTION **20**

Visual Impacts

EXECUTIVE SUMMARY

100 homes on host properties get no visual assessment at all. TR5 identifies 100 easement-affected dwellings in the visual study area and assesses none of them, because "no visual impact assessment is required" for a property that hosts the line. Only 57 neighbouring homes are assessed. (TR5 9.4.1, p. 145)

Most of the detailed assessments were done from a desk. Access was not obtained for 17 of the 26 homes needing a detailed assessment. Twelve of those 17 were then downgraded to low, very low or nil impact using LiDAR renders, and need no mitigation. (TR5 12.2, pp. 162–163, Table 35)

The method undercounts what people will see. Transmission lines are not counted at all; towers more than 1,527 m away are not counted; only the view from the house is assessed, not the farm; and construction impacts "may not be fully assessed". (TR5 1.7.2, p. 19; 8.3, p. 139; 11, p. 153)

The results are inconsistent. One landholder's own assessment rates the same view as High on one page and Moderate on another, with scenic quality changing from Moderate to Low. Tourist accommodation and a church are rated at a lower sensitivity than TR5's own table assigns them. (Landholder assessment, receiver I-8 D9, pp. 2, 4; TR5 Tables 29, 36)

The mitigation is trees that block the view they are meant to protect. It is offered rather than guaranteed, rests on trees reaching 5 m in five years, and is described by EnergyCo as "indicative". One landholder whose view is rated High says the proposed screening blocks the outlook it is supposed to protect. (TR5 17, p. 200; Table 45, p. 199)

The pastoral cultural landscape is described but never assessed. The heritage report defines the landscape by its open grazing lands, homesteads and long views, then gives it no significance or impact rating, assesses homesteads from the road and develops no visual mitigation. (TR3 pp. 56–57, 456–460, 481)

The only community visualisations were made for Woolomin, which the line no longer passes. Nothing comparable has been produced for Walcha or any community now on the route. (EIS pp. 56, 168, 170)

What we ask: (a) assess every dwelling, including those on host properties; (b) field-verify every downgraded result; (c) count conductors, the whole project and views from the working farm; (d) correct the inconsistent ratings; (e) make mitigation binding, funded and maintained; (f) set enforceable no-tower setbacks for high-impact homes; (g) redo the cumulative assessment with all REZ projects; (h) assess the cultural landscape as a whole; (i) publish visualisations for every community on the current route.

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1 | 100 Homes *excluded* from assessment

1.1 Evidence

TR5 states: "If a private landholding would host the proposed transmission infrastructure and be affected by an easement (referred to as an easement-affected dwelling or receiver), no visual impact assessment is required in accordance with the Technical Supplement." Within the visual study area it identifies **100 easement-affected private receivers** and **57 non-easement affected private receivers** (TR5 9.4.1, p. 145). The 100 are listed in the assessment as "No intermediate assessment required – easement affected dwelling".

The 377 m visual setback applies only to non-easement dwellings. TR5 notes that all non-easement dwellings are outside it except one (I-7 DB1), which receives a no-tower exclusion zone (TR5 9.2, p. 143; Measure LV10). No setback of any kind protects the 100 host homes.

1.2 EIS shortcoming

- The households who will live closest to the towers, often within a few hundred metres, are excluded from the only assessment of what they will see from their homes.
- The EIS therefore reports 4 high and 5 moderate impacts project-wide (TR5, Executive Summary). That figure leaves out almost two-thirds of the dwellings in the study area.
- Hosting an easement does not mean a landholder consented or was compensated for the view. Many hosts have not agreed to the line at all.

> POSITION SOUGHT

More work. Require a visual impact assessment of every easement-affected dwelling, reported alongside the other results, and apply the same setback and mitigation framework to them.

2 | Results decided from a desk

2.1 Evidence

Access was "not granted or could not be reasonably arranged for 17 dwellings (out of 26 private receivers requiring a Detailed Assessment)". For these, primary living areas and viewing directions were inferred from aerial imagery, building footprints and, "where available, real estate imagery" (TR5 12.2, p. 162). TR5 accepts that this "cannot account for fine-grain elements such as detailed garden vegetation, specific window locations or interior viewing conditions".

Outcome after LiDAR desktop assessment	Number of homes	Receivers	Source
Downgraded to low, very low or nil; no mitigation required	12	Q-40 D3, O-29 D1, O-28 D3, P-25 DN2, N-23 D1, H-12 SR1, I-8 D5, I-8 DN12, I-8 D3, I-7 D4, G-4 D15, G-4 D2	TR5 Table 35, p. 163
Remained moderate or high; mitigation required	5	O-32 D2, I-8 D9, I-8 SRA1 (Rouchel church), I-8 D7, H-5 D2	TR5 Table 35, p. 163

> Table 1 - **Desktop (no-access) detailed assessments and their outcome**

One tourism and recreation facility (P-25 DN2) dropped from High (38 cells) at the intermediate stage to Low (13 cells) on a desktop render alone (TR5 Table 35, p. 163).

Privacy. Landholders have received LiDAR renders of their homes, yards and sheds, generated from assumed window positions, and these outputs are published in the exhibited EIS (TR5 Appendix G). One landholder near Nundle described the render from her bedroom window as removing the privacy and security she had built with tree lines, walls and guard dogs, "with police 1 hour away". Another landholder states that access was not given and asks whether images were taken on the property without permission. (Landholder correspondence, 29 and 30 October 2026)

2.2 EIS shortcoming

- Most results that removed the need for mitigation were reached without anyone standing at the home.
- Using real estate listing photos to infer how people live is not a substitute for asking them.
- Publishing rendered views of identifiable rural homes and yards raises security concerns the EIS does not address.

> POSITION SOUGHT

More work. Require field verification, with the landholder, of every desktop result before it is accepted; offer landholders the right to have their own viewpoints assessed; and remove identifying renders of private homes from public documents unless the owner consents.

3 | A method that undercounts what people will see

3.1 Evidence

Element	How TR5 treats it	Citation
Conductors (the lines themselves)	"Cells containing only conductors or transmission lines are not counted as occupied cells"	TR5 8.3, p. 139; 11, p. 153
Towers beyond 1,527 m	"Transmission towers located beyond the Visual Study Area … are therefore excluded from the calculation", even where shown in the photomontage	TR5 11, p. 153; 12.1, p. 162
Views from the rest of the farm	Assessment is "strictly confined to the views observed from the dwelling itself, excluding views from the property boundaries or other ancillary parts of the property"	TR5 9.4.1, p. 145
Construction	Construction effects (cranes, laydowns, compounds) "may not be fully assessed"; ancillary infrastructure assessed only qualitatively	TR5 1.7.2, p. 19; §14
Seasons and weather	Seasonal vegetation changes "have not been separately modelled"	TR5 1.7.2, p. 19
Final tower locations	Assessment is based on a reference design; towers may be micro-sited anywhere in the approved project area	TR5 1.7.2, p. 19

> Table 2 - **What the visual magnitude count leaves out**

The project is dual 500 kV double-circuit lines, assessed at 80 m towers (TR5 9.1, p. 143). For a farming family, the line is seen all day from paddocks, yards and work areas, not only from the kitchen window.

3.2 EIS shortcoming

- The lines, the most continuous visible element of a dual 500 kV project, count for nothing in the rating.
- Following the Technical Supplement is not the same as measuring the impact people will experience; the assessment does not test whether the supplement's simplifications understate impacts here.
- Because towers can move within the corridor, a home rated "low" today may face a tower in a different place after approval. EnergyCo has told one landholder the "final impact would be ascertained once the infrastructure locations have been finalised" (EnergyCo email, 27 October 2026).

> POSITION SOUGHT

More work. Require a supplementary assessment that counts conductors and all visible towers, assesses views from working areas of affected farms, assesses construction-phase visual impacts, and is repeated on the final design before construction.

4 | Inconsistent and Contradictory Ratings

4.1 Evidence

Issue	What the documents say	Citation
Same view, two ratings	Receiver I-8 D9 (Rouchel Road): page 2 gives scenic quality Moderate and visual impact High; page 4 of the same assessment gives scenic quality Low and visual impact Moderate, for the same 38 occupied cells	Landholder assessment, I-8 D9, pp. 2, 4
Tourist accommodation and places of worship	TR5's viewpoint sensitivity table lists "tourist and visitor accommodation" and "places of worship" under high sensitivity, yet tourist accommodation H-12 SR1, tourism facility P-25 DN2 and Rouchel church I-8 SRA1 are each given moderate viewpoint sensitivity [VERIFY AGAINST TABLE 29 LAYOUT]	TR5 Table 29, p. 140; Table 36, p. 164
"Low" told to a landholder	EnergyCo told one landholder near Nundle the impact was low and "no visual mitigation is required", while also saying the final impact would be known only once tower locations are finalised	EnergyCo emails, 23 and 27 October 2026
Niangala Road (Walcha)	PVP-07 has 64 occupied cells, the highest count in the public results, rated Very High magnitude, but only Moderate impact because the road is given low sensitivity; the road crosses the corridor twice	TR5 Table 37, p. 165; Table 46

> Table 3 - **Inconsistencies in the ratings**

4.2 EIS shortcoming

- If one property's assessment contains two different ratings, the Department cannot rely on any rating without checking it.
- Lower sensitivity ratings directly lower the impact rating and remove the requirement for mitigation.

> POSITION SOUGHT

More work. Require EnergyCo to audit and correct every detailed assessment, publish a change log, and re-issue corrected results to landholders before determination.

5 | Mitigation That Blocks the View It Is Meant to Protect

5.1 Evidence

- Mitigation is "supplementary vegetation screening" that "will be offered to the landowner". The measures are "indicative and would be subject to further consultation" (TR5 Table 45, p. 199).
- Residual ratings assume planting reaches about 5 m in five years and gives "partial filtering … rather than complete screening" (TR5 17, p. 200). At I-8 D9, "upper tower sections and conductors are likely to remain visible" after five years.
- The Technical Supplement's performance objective requires that mitigation "would not result in a significant obstruction of views" (TR5 Table 44, p. 196). The I-8 D9 landholder states that the proposed screening blocks the view across the valley.
- At Rouchel Brook TR5 concedes denser planting "may also reduce the open outlook from the property" (TR5 Table 45, p. 199).
- By contrast, a binding no-tower setback has been given to only one receiver, I-7 DB1 (Measure LV10).
- On a local level – trees need to be able to survive frosts and drought in our regions. The growth rate noted at 5m in 5 years is not supported by documentation in the EIS that this can be achieved.

5.2 EIS shortcoming

- Replacing a rural outlook with a wall of trees is not mitigation of a visual impact; it is a different visual impact.
- Nothing in the EIS commits EnergyCo to establish, maintain, water or replace plantings, or sets a test of whether they work.
- Design changes (moving or lowering towers) are mentioned only as things EnergyCo "will continue to investigate … where feasible and reasonable".

> POSITION SOUGHT

Specific protection.

Condition:

a. no-tower setbacks, on the model of LV10, for every dwelling rated moderate or high;

b. tower relocation or height reduction before screening is relied on;

c. any screening to be agreed by the landholder, funded, established with advanced stock and maintained by EnergyCo for the life of the asset, with replacement of failures;

d. independent re-assessment after five years, with further measures if the residual rating is not achieved;

e. share studies of the predicted growth rates of the trees being achieved i
n the northern tablelands

6 | Cumulative Impacts and Night Lighting

6.1 Evidence

- "Only approved wind energy projects have been included." Projects proposed or under assessment are excluded (TR5 13, p. 172). Only two wind farms are considered: Bowmans Creek Stage 1 and Thunderbolt Stage 1.
- Lighting at energy hubs, including Central South Hub near Walcha, "would operate from dusk until dawn, seven days a week" (TR5 15.5, p. 195). The only dark-sky receptor assessed is Siding Spring Observatory, about 200 km away.
- TR5 accepts that new lighting "may be more noticeable where introduced into darker rural settings" (TR5 15.2).

6.2 EIS shortcoming

- The REZ exists to connect many more generation projects reportedly (although we are unsure what they are). Excluding everything not yet approved means the combined landscape the community will live with has not been assessed. The assessment should use all the reported projects that energyco continue to cite as reasons for building these transmission lines.
- It is not noted whether towers will have any lights on them (e.g. red lights) as seen in other regions. Equally it is not noted what would be in place to manage this if this was the case. This would have significant impact on our regional communities like Gundy where there is one tower in scone 40km away that they can see only.
- Rural night skies around Walcha are treated as having no value unless they serve an observatory. This is inadequate.

> POSITION SOUGHT

More work. Require a cumulative visual assessment including all REZ generation and transmission projects publicly proposed or under assessment, and a night-lighting assessment for dwellings near each hub and camp, with lighting limits set as conditions. Require visual impact assessment on possible lights on towers and visual impacts to landowners and neighbours

7 | The Pastoral and Cultural Landscape is not Assessed

7.1 Evidence

Much of the project area is a living heritage landscape. Oxley crossed this country in 1818 and squatters took up runs from the early 1830s. The pattern they set down is still visible: stations and family holdings, homesteads in sheltered valleys, woolsheds and yards, stock routes and early roads along the ridges, old huts, gold workings and graves, set within open granite and basalt country, remnant woodland, rivers, gorges and long, uninterrupted views. Generations of the same families have worked this land, and parts of the route cross barely cleared country that landholders have deliberately looked after.

The Historical Heritage Impact Assessment (Technical Report 3) recognises this. It defines the regional cultural landscape by its "open grazing lands… homestead complexes… and long views across valley systems", and says its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape". It records that community heritage feedback "primarily related to the natural landscape character of the project area". (TR3 §5.5, pp. 56–57; p. 31)

Issue	What the EIS and TR3 do	Citation
No significance rating for the landscape	TR3 says the landscape "is not defined by individual heritage items", yet the cultural landscape is never assessed against the NSW heritage criteria or given an impact rating. It accepts the landscape is "a representative example" of NSW pastoral development, which is itself a recognised heritage value	TR3 pp. 56–57
Assessed from the road	Listed items were viewed from public roads, in some cases using Google Street View and aerial imagery. Photomontages were all taken "from the closest public location", not from the homestead	TR3 pp. 28, 244, 456–460
Ratings understate proximity	Homestead "Warrane" is 0.95 km from the nearest tower but rated "low", counting only the nearest tower. The Timber house (I82) is rated "negligible" although TR3 could not identify which building is listed. Belltrees was rated without access	TR3 pp. 457–458, 460
No visual mitigation	"No specific management measures for visual impacts have been developed." At Barry Station, the only item rated moderate, the response is archival recording	TR3 p. 481
"Consistent with" existing development	The EIS concludes the change "is considered consistent with the existing pattern of infrastructure and rural land use development", and that cumulative impact is not significant "subject to implementation of the recommended mitigation"	EIS Ch 9, p. 376
Two standards	TR3 accepts that less modified areas with "more intact rural character", such as Rouchel Brook and Gundy, have "greater potential to introduce perceptible change". The Walcha Tablelands fit that description but are not assessed on that basis	TR3 p. 470

> Table 4 - **How the heritage assessment treats the landscape**

7.2 EIS shortcoming

- Twin 500 kV lines on towers up to 75–80 m, a 140 m cleared easement, new access tracks across slopes and ridges, energy hubs and camps change the landscape physically and permanently. They are not just seen differently.

- The "existing pattern of infrastructure" the EIS relies on is in the Upper Hunter. No existing transmission line, extractive industry or built renewable project of this scale is identified on the Walcha section.
- The cumulative conclusion depends on mitigation that TR3 says has not been developed, and is tested only "at a regional scale", which hides concentrated local loss. It also omits the REZ generation projects the line exists to connect.

> POSITION SOUGHT

More work. Require an assessment of the pastoral cultural landscape as a whole, against the NSW heritage criteria and with an impact rating, including the Walcha Tablelands on the same "intact rural character" basis applied to Rouchel Brook and Gundy; homestead settings assessed from the homestead with owner consent; and landscape-scale mitigation developed before determination.

8 | What the Community Was Shown

8.1 Evidence

- In 2024, in response to feedback from Woolomin residents, EnergyCo produced two animations showing what the lines would look like from Woolomin, with and without vegetation, and published them on its website and YouTube (EIS Ch 5, Table 5.4, p. 168).
- The corridor was later moved and now "avoided the communities of Woolomin and Dungowan" (EIS Ch 2 §2.7, p. 56).
- When the new study area between Muswellbrook and Walcha was announced in October 2025, the only animation produced showed the "size and scope" of the new study area at a regional scale (EIS Ch 5, p. 170). No comparable view-specific visualisations are recorded for Walcha, Niangala, Rouchel, Gundy, Barry or any other community now on the route.

8.2 EIS shortcoming

- The only community-level visualisations reported in the EIS are for a community the line no longer affects.
- Communities and landholders on the current route are asked to comment without being shown what the line will look like from their towns, roads and homes, beyond individual assessments for 26 dwellings.

> POSITION SOUGHT

More work. Require EnergyCo to publish visualisations, with and without vegetation, from each town, village and community on the current route, and from key local roads, before the end of the submission period or in a re-exhibited assessment.

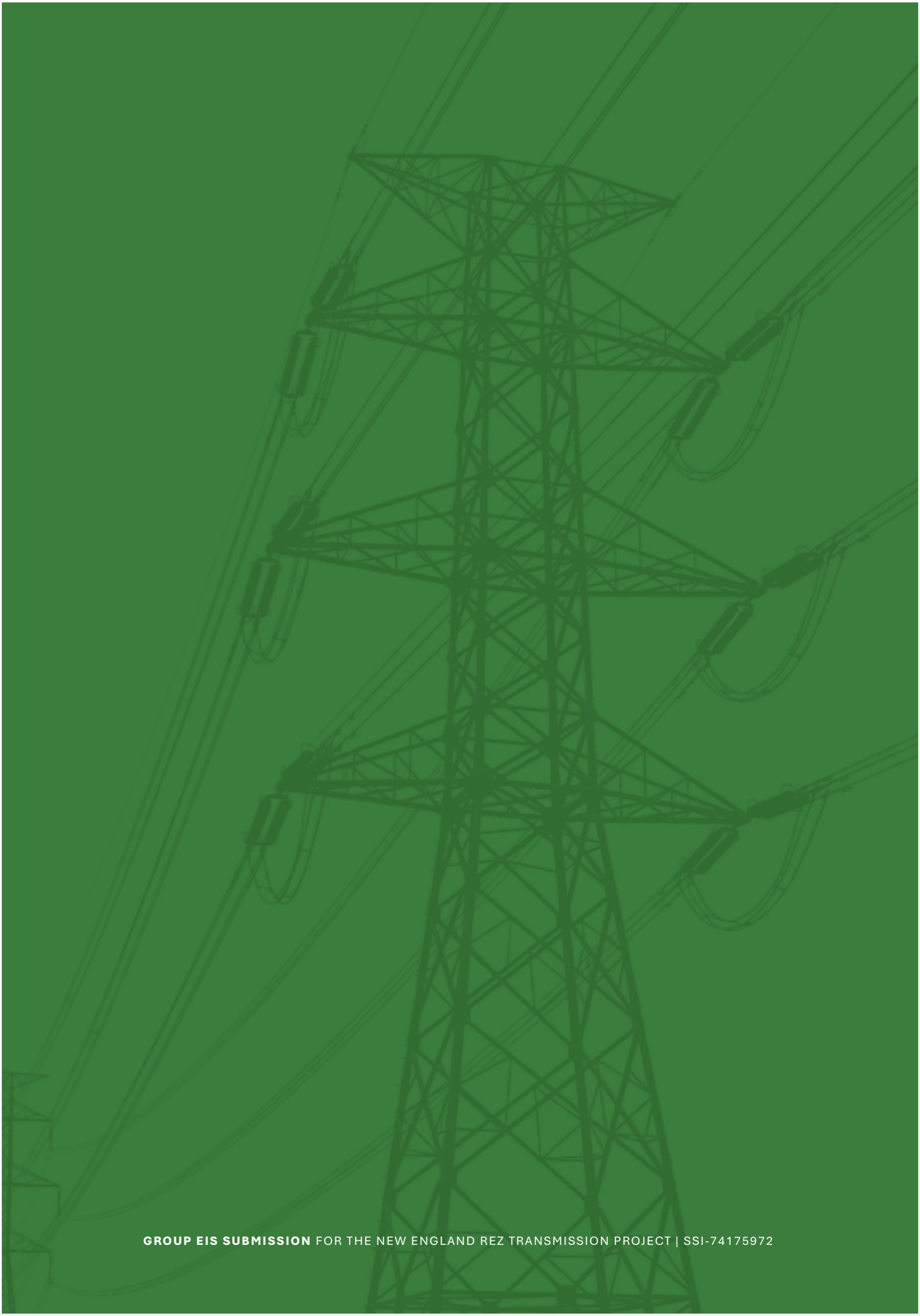
9 | Questions for EnergyCo

1. Why were the 100+ easement-affected dwellings excluded from visual assessment, and will they now be assessed and offered the same mitigation as their neighbours?
2. For each of the 12 homes downgraded to low or nil using desktop LiDAR only, will EnergyCo field-verify the result with the landholder before determination?
3. Were real estate listing photos used to infer living areas at any home, and which ones?
4. Was any photography or survey carried out on private property where access had not been granted?
5. Will identifiable renders of private homes and yards be removed from public documents unless the owner consents?
6. Why do conductors count for nothing in the visual magnitude rating, and what would the ratings be if they were counted?
7. Will the visual impact on working areas of farms (paddocks, yards, sheds), not only dwellings, be assessed?
8. Why does receiver I-8 D9's assessment give two different scenic quality and impact ratings for the same view, and how many other assessments contain similar errors?
9. Why are tourist accommodation, a tourism facility and Rouchel church rated at moderate rather than high viewpoint sensitivity?
10. Will every visual rating be re-assessed on the final tower locations before construction, and will landholders be able to comment on the result?
11. Will EnergyCo commit to no-tower setbacks, as given to I-7 DB1, for every dwelling rated moderate or high?
12. Who will fund, plant, water, maintain and replace screening vegetation, for how long, and what happens if it fails or does not reach 5 m in five years?
13. How does screening that blocks a landholder's outlook satisfy the performance objective that mitigation must not significantly obstruct views?
14. What will be done at Niangala Road (PVP-07), which records 64 occupied cells, beyond retaining roadside vegetation?
15. When will a cumulative visual assessment be done that includes all proposed REZ wind, solar and transmission projects? (the same projects that EnergyCo reportedly utilise to justify the build of this transmission line that residents aren't aware of).
16. What are the lighting levels, hours and light-spill limits for Central South Hub, and which Walcha dwellings will see it at night?
17. Why has the pastoral cultural landscape not been assessed as a whole against the NSW heritage criteria and given an impact rating?
18. Why were heritage homestead settings assessed only from public roads, Street View and aerial imagery, and will they be assessed from the homesteads with owner consent?
19. Which existing infrastructure on the Walcha section supports the conclusion that the project is consistent with the existing pattern of development?
20. What landscape mitigation will be developed, given TR3 says no visual management measures have been developed?
21. Why were animations produced for Woolomin, which the line no longer affects, but not for Walcha, Niangala, Rouchel, Gundy, Barry or other communities now on the route? Will they be produced?

SECTION **21**

Upper Hunter Equine Critical Industry Cluster

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 **21**

Upper Hunter Equine Critical Industry Cluster

Key issues we have found ...

Cluster survival does not excuse harm	Regional resilience does not establish that losses to individual studs, connected businesses and land needed for future breeding are acceptable.
Breeding landscapes deserve proper assessment	Local scenic values support the equine industry's reputation, yet the assessment understates effects on working properties, visitor areas and approaches.
Basic property facts remain inconsistent	Conflicting corridor distances and paddock descriptions undermine conclusions about Kitchwin Hills; neighbouring equine operations also need explicit mapping and assessment.
Horse health safeguards remain unproven	Noise assumptions derived from stabled racehorses require testing for outdoor breeding stock, alongside helicopter disturbance, construction dust and foal health.
Breeding seasons need binding protection	Combined works need enforceable controls protecting breeding and foaling, with relocation feasibility established and safeguards operating before enabling works begin.
Test avoidance before approving harm	Publish and independently review route alternatives, comparing equine impacts, construction constraints, environmental effects and costs before accepting the current

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SECTION **21**

Part A - Protecting the Upper Hunter Equine Critical Industry Cluster

EXECUTIVE SUMMARY

The central issue is the difference between a cluster surviving and a cluster being protected. A regional conclusion that the Upper Hunter equine industry will remain competitive does not establish that avoidable damage to a particular breeding valley, its established operations or its future capacity is acceptable.

The EIS passage identified in the supplied chapter review recognises that scenic values are integral to the equine industry's ongoing reputation, but characterises the affected landscape as relatively less critical to the CIC's scenic and functional values.

HoustonKemp's economic assessment goes further: it reasons that the cluster would remain resilient even in the unlikely event that Kitchwin Hills relocated. Those propositions require a much more searching local assessment than an assurance that most of the regional industry is elsewhere. [1, EIS section 11.5.5, pp. 439-440; 3, section 6.2, pp. 42-43]

The evidence contains material matters requiring reconciliation. TR22's receptor schedule records Kitchwin's Bottom Farm at approximately zero kilometres from both the project area and transmission corridor, while its property-value analysis relies on Kitchwin being approximately 800 metres away and the selected operations not intersecting the corridor. TR21 describes possible overlap of Kitchwin paddocks with the corridor, then states that no identified equine paddocks are within it. The reports must identify and reconcile the conclusions that depend on those distances and then must be reassessed. [2, section 6.3, p. 37; 3, Table 4.1, p. 24 and section 6.1.2, p. 42]

The neighbouring Archibald operation must be expressly accounted for. The operational statement supplied for James and Sally Archibald describes approximately 165 horses and 120 cows, paddock foaling, mares with young foals, client-owned spelling horses and seasonal calving. It describes connections with the nationally prominent training business of Rob and Annabel Archibald. These are concrete activities and exposure and growth pathways, not an interchangeable area of ordinary grazing land.

The horse-health assessment needs a property-specific test. Its 65 dB(A) benchmark derives from a study concerning concert noise and stabled racehorses, whose authors could not establish definitive exposure criteria. Its own literature review identifies a potential risk to foals from short-term dust where virulent Rhodococcus equi may be present. These qualifications require a defensible explanation of why the proposed controls linked to stables racecourse horses can protect mares, foals and other horses in open paddocks. [2, sections 5.2 and 6.5; Appendices B and D, pp. 79 and 95]. All CIC access roads would need to be tarred in order to prevent Rhodococcus virus impacts.

The Groups seek six principal outcomes. First, a verified, current land-use and receptor plan. Second, an independent local landscape and visual review, including the supplied Kitchwin viewpoints. Third, an economic assessment of affected businesses, realistic expansion and cumulative fragmentation, not only regional survival. Fourth, an independent equine-health and farm-operability review covering Kitchwin the Archibald property and any other Equine businesses within the ECIC that may be effected. Fifth, publication and independent testing of the actual eastern alternatives and reasons for rejecting them. Sixth, a reasoned decision on avoidance before approval, with specific enforceable protections applying before any relevant enabling works if residual impacts are accepted.

This is not a claim that CIC designation creates an automatic veto over transmission infrastructure. It is a request that a recognised strategic industry, its landscape and its capacity to develop receive substantive protection in the decision, rather than being discounted because the affected part is small relative to the whole.

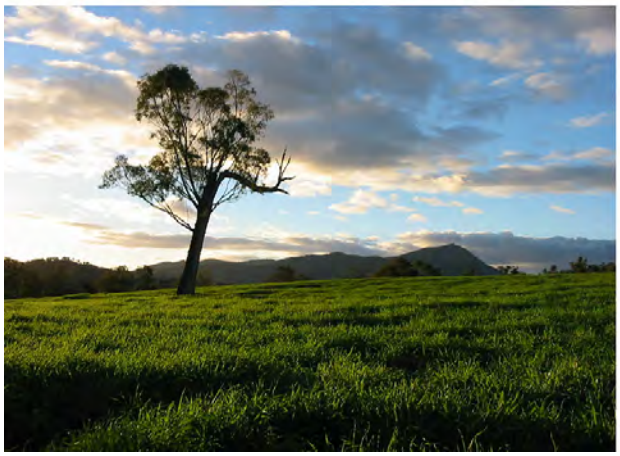
> POSITION AND DECISION SOUGHT

The Group objects to approval of the project in its present form, particularly the alignment and associated works affecting the Upper Hunter Equine Critical Industry Cluster (CIC). The evidence presently relied on does not adequately establish that the concentrated impacts on the Gundy, Waverley , Archibald and Kitchwin locality, its existing businesses and its realistic expansion opportunities are acceptable.

Our primary position is avoidance: the determining authority should require a transparent, independently reviewed comparison of feasible alternatives, including alternatives further east, that avoid or materially reduce harm to the CIC. Where a feasible alternative produces a better overall environmental, agricultural, community and industry outcome, the project should be redesigned and assessed accordingly.

Approval should not be granted on the assumption that unresolved receptor locations, horse-management constraints, local visual effects and the feasibility of mitigation can be settled after the route is authorised. Where the necessary evidence cannot demonstrate acceptable impacts, the affected alignment should not be approved. The Groups also seek independent scrutiny of the wider project's economics, need, scale, staging, constructability and resource requirements.







> Kitchwin Hills: a working equine landscape experienced from accommodation, paddocks and visitor areas.

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1 | Scope, evidence and the standard of response sought

EnergyCo's response should address each material issue with the relevant evidence, model inputs, mapped location and reasons. Where it considers an issue already answered, it should identify the exact report, section, page and applicable commitment. A general cross-reference to a large technical report or a promise of future consultation will not resolve a specific factual inconsistency.

2 | What the CIC requires decision-makers to confront

2.1 A functioning industry and its future, not a label on a map

The Hunter Regional Plan 2041 recognises the significance of the equine industry and its relationship with agricultural land, scenic values, reputation, tourism and opportunities for expansion. Strategies 9.3 and 9.4 address the environmental and scenic attributes of CIC land, industry branding, adaptation, future uses and compatibility. These strategies operate in their stated strategic and planning-proposal contexts.

A worthy CIC assessment must examine the connected system at the place affected: breeding and foaling paddocks, yearling and spelling facilities, staff, veterinarians, farriers, feed suppliers, transport, clients, visitors and suitable adjoining land.

The assessment should distinguish mapped CIC status from functional connections outside the mapped boundary. A neighbouring horse operation can be relevant to cumulative impacts and industry relationships even if some or all of its land is outside the formal boundary.

2.2 The legal position must not be overstated

The Planning Portal identifies this project as declared critical State significant infrastructure. Its approval pathway is not the mining or petroleum gateway process. The State Significant Infrastructure Guidelines explain the special operation of section 5.22 of the Environmental Planning and Assessment Act 1979 in relation to environmental planning instruments. The Groups do not contend that mining-specific CIC provisions automatically prohibit this transmission project, or that identifying any alternative legally compels its adoption. [4; 6]

The request is instead a substantive planning one: explain why this alignment is justified after comparing its full impacts with feasible alternatives and properly valuing the affected CIC locality. A declaration that infrastructure is critical does not itself answer the site-specific questions raised in this submission.

2.3 Why this matters to other studs

Approval here would not automatically repeal the CIC mapping, remove other landholders' rights or legally authorise the next development. The practical concern is cumulative erosion. If each project treats its affected part as dispensable because the wider cluster survives, successive decisions can fragment the very landscape, capacity and connections that the designation recognises.

The decision should therefore identify the cumulative change it is accepting, the industry functions and growth opportunities being retained, and why the reasoning does not reduce protection to the survival of the largest remaining studs. A smaller operation is not without strategic value merely because larger businesses exist elsewhere.

> RESPONSE REQUIRED

Explain the assessment framework used for the CIC, how strategic policy has informed route selection, and how concentrated and cumulative losses are evaluated independently of whether the regional industry would survive.

3 | Visual amenity: assess the landscape where the industry operates

3.1 The EIS's own acknowledgement is the starting point

"The scenic values of the equine CIC are integral to the ongoing reputation of the industry." It also acknowledges that towers may appear visually dominant nearby, while concluding that the affected parts are relatively less critical to the CIC's core scenic and functional values and that overall regional scenic quality would not be diminished. [1, EIS section 11.5.5, pp. 439-440]

These are not equivalent propositions. A landscape may be a relatively small part of a large region and still be highly important to the businesses, clients, residents and visitors who use it. **The regional conclusion must not substitute for an assessment of local effects and their acceptability.**

The chapter review also records that Waverley Road contributes views of studs, polo fields and associated facilities but is given a more limited role because it is not a designated scenic route or tourist drive. That classification does not answer what the road means as an arrival route, a client inspection route or the connection between working equine properties. [1, EIS section 11.5.5, p. 440]

3.2 Supplied photographs establish

The photographs showing connected paddocks, mature trees, enclosing hills, open skylines, managed approaches, horses and young stock, and views from outdoor accommodation areas. They demonstrate the types of local landscape experience that must be assessed. The relevant question is the incremental scale and character of the proposed development.

The photographs also show why an assessment restricted to the footprint of a tower pad would be inadequate. A viewer experiences paddocks, hills, vegetation, sky and the relationships between them. Clearing, access tracks, repeated towers and conductors can affect that experience beyond the land physically occupied by infrastructure. The project-specific extent must be modelled rather than assumed.

3.3 Acknowledge the existing modelling, then test it

TR22 states that The Barn was assessed using LiDAR and three-dimensional modelling, with a low visual impact rating. We strongly reject this claim as inaccurate. It relies partly on the principal entertaining areas facing north and the proposed line being to the east, and refers to TR5, pages 164-165. The issue is whether the assessment captures the actual range of views, movement and uses, and whether its inputs and conclusions withstand an independent local review. [3, section 7.2.2, p. 51]

The review should include outdoor entertaining and pool areas, guest rooms where relevant, arrival and departure routes, stud tours, paddock inspections, working areas, homes and representative public-road views. A finding about the orientation of a building's principal entertaining area does not necessarily settle the full visitor experience.

The visual impact model should show both proposed transmission lines and conductors, the actual height range and siting envelope, tower pads, access tracks, vegetation removal, road changes and visible ancillary

works. It should identify where current vegetation provides screening, whether that vegetation will remain, and the consequences of seasonal variation, maintenance or loss. Screening that takes years to establish should not be credited as though it exists on the first day of operation.

3.4 Landscape value does not depend on proving a percentage price loss

The Groups do not assert that a tower causes a particular reduction in yearling price, stallion value, occupancy or land value. Those claims would require separate evidence. Landscape character, amenity and community identity are matters to assess in their own right. The role of setting in a farmstay or equine business adds a commercial dimension; it does not require speculative financial percentages to make the visual issue relevant.

The Barn is a particularly concrete example because its offering includes the experience of staying in a working thoroughbred landscape. The assessment should test bookings, guest reasons for visiting, advertised views and the sensitivity of that offering to construction and permanent change, rather than infer that continued demand somewhere else establishes no loss here. [3, sections 4.2.2 and 7.2; 8]

Response required: Commission an independent Waverley-Kitchwin landscape and visual review, with agreed representative viewpoints, disclosed inputs and verified photomontages. Explain or revise the "relatively less critical" characterisation using that local evidence. Provide the relevant TR5 model outputs and explain how access tracks and ancillary works have been assessed across the project reports.

4 | Kitchwin Hills: a history of investment and a valley with capacity to grow

4.1 An established contribution

The Brown family's purchase of a 300-acre cattle property in 1993 and the development of the thoroughbred business around 2000. Kitchwin's account describes growth from one farm to two and subsequently three. Complementary Top and Bottom Farm functionality, specialist facilities, mare and foal management, yearling preparation and staff development.

This valley has bred major racehorses include Vow And Declare, winner of the 2019 Melbourne Cup; Yes Yes Yes, winner of the 2019 Everest; and Pierata, winner of the 2019 All Aged Stakes, Golden slipper winner Phelan Ready and multiple Epsom Handicap and Empire Rose winners amongst many other elite race horses winners. The valley delivers foaling, rearing, preparation and sale-presentation roles. Those elite racehorse production achievements demonstrate that this locality has supported activity connected with the highest levels of Australian racing.

The valley also records the development of The Barn as a visitor business. This adds another relationship between the agricultural operation, its presentation and the valley's setting. The point is not that history alone prevents change. It is that the contribution and accumulated investment at this location must be accurately understood before it is described as less important or readily replaceable.

4.2 Kitchwin video

The Groups ask the assessor to view the Kitchwin Hills, “Hills that just keep producing”, published in March 2022.

> Watch the Kitchwin Hills video https://www.youtube.com/watch?v=_I56OJbnEXo

The video is offered as historical context for Kitchwin's setting and industry presentation. It is not a verified route simulation, a survey of current operations or proof of the engineering feasibility of an eastern alternative. The supplied history records subsequent expansion of neighbouring thoroughbred activity that would be extinguished by the proposed transmission line.

4.3 Do not freeze the valley at a convenient date

The assessment should document three periods: the valley approximately twenty years ago; the verified present position; and realistic opportunities over the next twenty years. This is not a request to invent a growth forecast. It is a request to identify suitable holdings, credible expansion plans, water and access constraints, existing investment, relevant market demand and what the project would change.

A statement that some CIC land is not presently used for breeding is not an answer to whether it is suitable expansion land.

> RESPONSE REQUIRED

Prepare an up-to-date Kitchwin and neighbouring-operations profile, verified with owners and operators. Assess existing activity, investment, employment, visitor use, supply relationships and realistic expansion separately from regional industry survival.

5 | Economic assessment: survival is not the same as absence of harm

5.1 The regional resilience conclusion does not answer the local question

TR22 concludes that an exodus of thoroughbred operations threatening the CIC's competitiveness is unlikely. It describes Kitchwin as comparatively small and reasons that the cluster would remain resilient even in the unlikely event of its relocation. That may address one regional risk scenario. It does not establish the acceptability of losses to this locality, the costs of relocation, the effects on connected businesses or foregone future investment. [3, section 6.2, pp. 42-43]

The report identifies four attributes of the region: access to ports and markets, reputation, service providers and a favourable breeding environment. It states that at least the first three would remain unaffected, then reasons that the project is unlikely to deter establishment or expansion near the corridor. The Groups seek the missing local analysis: how changes to the physical environment, operating conditions and setting affect investment decisions in the land actually exposed. [3, section 6.2, pp. 42-43]

TR22 also records HTBA's concern about land identified for potential expansion, but distinguishes decisions on individual properties from the capacity of the cluster as a whole. The capacity of a cluster is necessarily realised through particular landholdings and businesses. It is therefore necessary to identify which opportunities would be retained, constrained, displaced or lost, not merely whether another part of the region might grow. [1, citing TR22 section 2.4.1, p. 19]

5.2 Existing studs near powerlines are not a complete counterfactual

TR22 refers to existing thoroughbred operations near 330 kV or 500 kV infrastructure and to accommodation businesses near transmission lines. Continued operation, however, does not itself measure what performance, investment, land use or visitor demand would have been without the infrastructure. [3, sections 7.1.2 and 7.2.2, pp. 48-51]

The comparison should account for the number and height of structures, line configuration, siting relative to working paddocks and principal views, construction exposure, terrain, screening, business model and any mitigation or compensation. It should also distinguish the ability to remain trading from the absence of material loss.

5.3 A local economic assessment should expose costs, not assume them away

The revised assessment should identify the range and distribution of potential costs, including altered paddock use, staff supervision, additional handling, veterinary monitoring, interrupted access, relocation and agistment, dust level monitoring, changed visitor demand and constraints on future development. Claims should be supported by records and sensitivity analysis, with confidential commercial information protected where appropriate.

Relocation should be assessed as a real option with capacity, timing, cost and welfare constraints, not treated as a phrase that resolves impacts. Whether another property is suitable depends on facilities, isolation capacity, pasture, water, staff access, proximity to breeding services and the animals' stage of pregnancy or development. A business's ability to bear disruption is not evidence that the disruption is immaterial.

> RESPONSE REQUIRED

Add a locality and affected-enterprise assessment to the regional analysis. State the no-project baseline, the project scenario and the alternatives; identify uncertainty and distributional effects; and explain how cumulative losses and realistic future investment have been valued in route selection.

6 | Resolve the footprint and distance inconsistencies before relying on conclusions

TR22 Table 4.1 places the Kitchwin Bottom Farm at approximately zero kilometres from the project area and corridor. Section 6.1.2 relies on an approximately 800-metre distance and says the selected operations do not intersect the corridor. The Top Farm is recorded at approximately zero kilometres from the project area but about 2.6 kilometres from the corridor. These distinctions matter because the project area includes more than the overhead lines. [3, pp. 24 and 42]

TR21 section 6.3 states that Kitchwin Bottom Farm paddocks are immediately adjacent to, and may partially overlap, parts of the corridor where helicopter stringing may occur. The same section states that no identified equine facilities or paddocks are within the corridor. The Groups do not assume that both statements refer to identical polygons or measurement points. EnergyCo must explain what each statement means and correct any error. [2, p. 37]

The property-value inference in TR22 relies on overseas studies and separation distances. Those studies do not establish a fixed percentage loss for Kitchwin or the Archibald property or other equine businesses in the valley. They also cannot resolve the local assessment while the relevant distances are unclear. The appropriate response is a verified local baseline and a reassessment of any conclusion that relies on the disputed measurements. [3, section 6.1, pp. 40-42]

The Groups request one coordinated geospatial plan showing legal parcels, current ownership and operation, mapped CIC land, functional equine holdings, paddock uses, homes, guest areas, visitor routes, water points, yards and horse crossings. It must also show the project-area boundary, corridor boundary, indicative centreline, each proposed tower, the permitted siting envelope, easements, access tracks (Sealed vs. unsealed), work compounds, road works and other relevant infrastructure.

Distances must state their start and end points. A distance from a dwelling, a farm centroid or a business label on a map is not interchangeable with the distance from an occupied foaling paddock or an access track. The assessment should test the realistic adverse siting permitted by the approval, not only a favourable indicative location that may move during detailed design.

> RESPONSE REQUIRED

Publish the reconciled plan and a written correction schedule before determination. Reassess affected visual, noise, dust, aviation, property and economic conclusions, and identify any newly affected receptors or expanded controls. Verification should inform whether and where approval is justified, not only how construction is managed afterwards.

7 | James and Sally Archibald's property: a connected equine and cattle operation

7.1 The operating evidence supplied

James and Sally Archibald property is an active horse and cattle operation neighbouring Kitchwin Hills. It reports approximately 165 horses and 120 cows, including mares, foals, client-owned horses, spelling horses and breeding cattle.

As per Kitchwin and other valley breeding operations, James and Sally are foaling between August and December, with approximately 70 per cent of mares foaling naturally in paddocks and approximately 30 per cent under night supervision. Mares and foals then use larger paddocks for around eight months. Calving is during August, September and October, rejoining in October, and there is a need for cows and calves to be left sufficiently undisturbed.

These details should change the assessment questions. The relevant exposure is not limited to a stable building or the nearest dwelling. It includes occupied paddocks, the duration of mare-and-foal use, handling and movement routes, supervision, fencing, calving areas, unsealed access roads and the capacity to separate animals safely. The significance of an exposure depends on what is happening on the property when it occurs.



7.2 Connection with leading Australian trainers

Client horses spelled on the Archibald property include horses associated with Rob and Annabel Archibald, whose training activities connect the property with Scone, Sydney and Brisbane. Archibald Racing is a leading Australian thoroughbred training operation.

This connection illustrates the CIC's wider function. A spelling or rearing property can support a national racing business without being a major stallion station. Its importance should not be discounted because the horses race elsewhere or because a training headquarters is outside the immediate corridor. The assessment should establish the actual client relationships, throughput and management requirements with the owners.

> https://www.ontrackracing.com.au/news-feed/new-training-partnership-for-neasham-archibald

7.3 Express recognition in the assessment

The supplied technical reports do not identify the property under the names Archibald, Annabel or Sally in the text searches undertaken for this submission. That is not proof that the land is absent from all mapping or that it is not recorded under another name. EnergyCo should identify the relevant receptor designation and confirm how the reported operation has been included. [2; 3; 7]

Its cadastral identity, mapped CIC status, paddock boundaries and distances to the corridor, access routes (sealed vs. unsealed) and flight activity remain to be verified. The landholder evidence is sufficient to require an express response rather than reliance on a generic nearby-farm category.

7.4 Aerial activity and foreseeable consequences

The landholders identify concern about low-level flight, hovering, rotor noise, movement and downwash near pregnant mares, foals, client horses, cattle, fences and people. TR21 itself recognises that helicopters can affect horses over greater distances than other works because of visibility, movement and noise. [2, section 6.3, pp. 37-38; 7]

The Groups do not claim that every flight will cause injury, pregnancy loss or animal separation. Nor do they claim that land ownership gives an unrestricted legal veto over all lawful overflight. They request project-specific controls that address these foreseeable pathways before planned intrusive aerial operations proceed.

For non-emergency project flights, the plan should identify the purpose, dates and contingency dates; aircraft and operator; proposed flight paths, altitude, hovering and approach patterns; applicable approvals; the position of occupied horse and cattle areas; and the equine, livestock, aviation and workplace risk assessments. It should identify a farm contact, real-time communications, observers where justified, objective pause or abort triggers and an incident response procedure.

Advance notice is useful but cannot make an unsafe operation safe. The feasibility of ground-based inspection or other lower-impact methods should be assessed first. A plan that assumes animals can simply be moved must establish where, for how long, with what handling risk and at whose cost. Insurance arrangements should be disclosed as a proposed safeguard, without suggesting that insurance prevents harm or predetermines liability.

> RESPONSE REQUIRED

Conduct a joint site verification with the Archibalds and other impacted equine opertions, their nominated veterinary adviser and the project specialists. Update the receptor register and reassess the operation explicitly. Establish property-specific controls before relevant works or planned aerial activity, with the landholders' objection to the alignment and their legal rights expressly reserved.

8 | Equine health, dust and construction: test the assumptions against working farms

8.1 A provisional noise benchmark is not a universal safety threshold

TR21's literature review discusses a 65 dB(A) LAeq recommendation for a proposed music festival at Flemington, concerning noise in stables. The source authors were unable to establish definitive criteria for exposing thoroughbred horses to noise. Applying that practical benchmark to breeding mares, foals and young stock in open paddocks requires an explanation, not an assumption of equivalent sensitivity and management conditions. [2, section 5.2 and Appendix B, p. 79]

The review should consider peak and impulsive noise, frequency characteristics, the combination of sound and visible movement, exposure duration, unpredictability and the animals' circumstances. A daily or event-average level alone may not describe a sudden startling event. The Groups seek an independent equine veterinarian and appropriately qualified acoustician to set defensible assessment criteria and explain their limitations.

TR21 reports approximate distances within which particular construction activities may exceed the adopted benchmark: 140 metres for access-track works, 160 metres for clearing, 200 metres for foundation works involving rock breaking, and 550 metres for helicopter operations. These are modelled exposure distances under stated assumptions, not demonstrated safe boundaries or proposed universal statutory setbacks. [2, sections 6.1 and 6.3, pp. 35 and 37]

8.2 A short disturbance can have a longer consequence

TR21 repeatedly anticipates temporary vigilance, startle or avoidance responses and concludes that impacts are likely to be manageable. That conclusion should be tested against the consequence of a response in the actual setting. A brief movement may be inconsequential in one paddock but interact differently with fencing, young foals, handling, machinery or a road crossing in another. This is a risk-assessment question, not a claim that injury is inevitable. [2, sections 6.1-6.3]

The independent review should identify vulnerable activities and practical controls, including separation, sight lines, secure fencing, supervision and whether work should be relocated or rescheduled. The consequences to workers and contractors handling horses should be assessed with the equine consequences, rather than treated as unrelated topics.

8.3 Rhodococcus equi and the need to control dust at source

TR21's construction-dust assessment notes that dry and dusty conditions can increase exposure to Rhodococcus equi where it is present, but considers the risk generally associated with existing horse-related land uses and not a significant project-related risk. Its literature review separately identifies a potential risk

to foals from short-term dust exposure where relevant bacteria may be present in construction topsoil. [2, section 6.5, p. 39 and Appendix D, p. 95]

The fact that a pathogen is associated with an existing land use does not resolve whether a new dust-generating activity increases exposure. EnergyCo should explain the source-pathway-receptor reasoning: what soil and surfaces are disturbed, how material becomes airborne, which occupied paddocks are downwind and what controls prevent an additional exposure. The Groups do not assert that the supplied properties are infected or that construction will cause an outbreak.

The project should obtain veterinary advice on a proportionate baseline and surveillance program, including whether targeted soil or airborne sampling would be informative. Negative samples should not be treated as proof that a widespread environmental organism is absent everywhere, and ordinary particulate monitoring should not be represented as a direct measurement of pathogen exposure. Measures should be justified by their ability to reduce risk, not by the appearance of a testing program.

8.4 Seal access roads near breeding and foaling operations

The Groups seek a requirement that new or upgraded project access routes serving repeated construction or maintenance traffic near breeding, foaling and other sensitive equine areas be sealed with an appropriate durable surface before sustained traffic begins. The assessed zone should be defined by proximity, wind, terrain, traffic and occupied paddocks, not by an arbitrary radius unsupported by the site evidence.

Where EnergyCo proposes an exception, it should demonstrate through an independent, property-specific assessment that another method provides equivalent protection throughout dry and windy conditions, without relying solely on intermittent watering. This is a requested approval requirement, not an assertion that sealing is already legally mandatory or that sealed roads eliminate all disease risk.

The plan must address dust from building the track itself, shoulders, passing bays, stockpiles, cleared easements, tower pads and imported material. It should specify traffic speeds, covering and handling of loads, surface maintenance, monitoring locations, weather triggers and work stoppage or modification where controls fail. Water for dust suppression on non-sealed access tracks must be demonstrably available without compromising existing farm needs.

8.5 Breeding calendars, combined exposure and relocation

The assessment must combine all relevant work fronts: road upgrades, access-track construction, clearing, tower works, traffic, aerial operations, compounds and any nearby camp activities. The overall project program is not evidence of continuous works at every farm, but neither is the duration of a single tower activity an adequate account of repeated disruption across several breeding seasons. [1, EIS project and construction references; 3, sections 1.2.3 and 7.1]

Kitchwin's reported foaling period is August to December and breeding is concentrated in September to November. The Archibald’s identify overlapping foaling and calving periods and continued mare-and-foal use beyond them.

Before determination, EnergyCo should demonstrate a workable schedule and controls for the high-impact activities that drive the compatibility question. Detailed daily programming may follow, but the fundamental availability of a safe and realistic construction method should not be deferred. Relocation should not be counted as effective mitigation unless suitable capacity, safe transport, facilities, staffing, biosecurity and funding are identified.

8.6 Other risks should be dealt with proportionately

Lighting near breeding operations, fencing continuity, electrical earthing, weeds and biosecurity require specific assessment and controls. The lack of controlled equine studies on electromagnetic-field effects should not be converted into a claim of proven harm. Similarly, examples of therapeutic vibration do not, without further analysis, establish the acceptability of unrelated construction vibration. The submission's strongest health case concerns verified exposure, animal behaviour, dust pathways and the practicality of controls. [2, sections 5-8]

> RESPONSE REQUIRED

Obtain an independent, property-specific equine-health and operability review, disclose the assumptions, establish baseline records and define measurable controls and incident responses. Resolve any incompatibility that can only be addressed by changing the route before relying on post-approval management plans.

9 | The eastern alternative must be demonstrated, not dismissed by a conclusion

9.1 What EnergyCo has said

EnergyCo's April 2026 information sheet states that the corridor at Gundy and Waverly was moved east as far as practical within environmental and topographic constraints to reduce equine-business impacts and increase separation from dwellings. The EIS passage identified similarly refers to movement east within topographic bounds. That acknowledges the relevance of equine impacts, but does not by itself explain whether further avoidance is impossible, disproportionately harmful or simply more costly. [1, EIS section 11.3, p. 429; 12]

The EIS includes Appendix B, a route-options and avoidance paper. This submission does not assert that no alternatives assessment exists. It asks EnergyCo to identify and disclose the particular options, constraints and comparisons that support its conclusion for this locality. A broad regional option analysis may not answer a distinct local bypass or a different connection arrangement.

9.2 The comparison required

For each relevant option, the Groups seek a plan at a common scale, a clear description of the infrastructure, the degree of avoidance of mapped and functional equine land, and a reasoned comparison. That comparison should include terrain, geotechnical constraints, tower design, access and earthworks, biodiversity, waterways, heritage, bushfire and aviation, affected communities and properties, construction disruption, maintenance, whole-of-life cost and uncertainty.

Physical impossibility, a substantial environmental constraint, an increase in engineering complexity and a cost premium are different reasons. They should be identified separately. A feasible alternative is not necessarily preferable merely because it avoids one property; conversely, **a more expensive option is not automatically unreasonable where it avoids substantial, long-lived harm to an established industry.**

The assessment should test meaningful alternatives at the appropriate level: wider corridor changes, a local eastern bypass, use or augmentation of existing infrastructure where feasible, altered connection or staging arrangements, and targeted design solutions. Undergrounding should not be assumed to be universally feasible or impact-free, but any locally credible option should be assessed on its actual engineering and environmental merits rather than a generic dismissal.

9.3 Visual demonstration is useful, but is not an engineering assessment

The proposed alternative-route video can help explain topography, separation and the landscape experience. It should be accompanied by a mapped alignment, engineering input, the known constraints and an explanation of what remains uncertain. An attractive fly-through does not establish constructability or lower overall impact.

Any filming should itself respect livestock, land access, aviation and safety requirements. Existing terrain data, ground-based imagery and other lower-impact methods should be considered before commissioning low-level flight near working horse properties.

9.4 The outcome sought

The Groups ask the Department to obtain independent review of the local alternatives comparison. Where a feasible eastern or other alternative materially reduces CIC impacts and produces the better overall outcome, the Groups seek its adoption and assessment through the appropriate amendment process, including a fair opportunity for newly affected people to comment. If EnergyCo maintains that the present alignment is preferable, it should publish the reasons and the trade-offs it is asking the determining authority to accept.

The community should not be required to produce a final engineered and costed transmission design before a credible avoidance option is examined. Equally, this submission does not represent that a particular eastern route has already been proved feasible.

10 | Wider project questions reinforce the need for a justified route

The community has additional concerns about: the appropriate network scale, generator demand, genuine staging, difficult terrain, water, road capacity, workforce accommodation, waste, biodiversity, fire and rural aviation. These should be assessed on current, traceable evidence.

10.1 Need, scale and staging

The project case should distinguish transmission transfer capacity from installed generation capacity and storage power or energy. These are not interchangeable quantities. EnergyCo should explain the current generation assumptions, their maturity and uncertainty, the role of the proposed hubs, and the consequences if expected projects are delayed, altered or not built.

The EIS needs to outline whether there remains an effective decision point to reduce or defer later investment. EnergyCo should distinguish planning approval for an ultimate configuration, physical construction, energisation and financial commitment. It should identify which investments can actually be deferred and what evidence triggers them.

The current proposal should be compared with credible smaller, staged or existing-corridor alternatives. The public-interest case for transmission does not, without that comparison, establish the necessity of the present local alignment through the CIC.

10.2 Constructability and whole-of-life access

A July 2025 design-refinement report containing substantial access-track, earthworks and complex tower-pad requirements. The substantive question remains: what access and construction method is required at each constrained location, and what additional clearing, erosion, aviation reliance, maintenance and cost does it entail?

An independent review should examine seasonal working conditions and reasonable contingencies using representative weather and terrain evidence, not infer an inevitable completion date from an isolated production rate or a single wet season.

10.3 Water, traffic and cumulative demand

The water demands of the transmission project, the wider REZ generation program and construction camps must be separately identified and then assessed together where they overlap. Lifetime megalitres and peak daily demand should not be conflated. EnergyCo should identify reliable sources, drought assumptions, conveyance, treatment, approvals and competing farm and town demand.

Road capacity is not the only transport issue. The assessment should address heavy vehicles sharing roads and entrances with horse floats, livestock movements, school and community traffic, veterinary access and emergency services and dust implications on foals. It should explain pavement damage, funded upgrades, safe passing, temporary closures and how adjacent works combine at particular properties.

Cumulative assessment should also address other reasonably foreseeable works using the same roads, water, accommodation, waste facilities and services. A broad statement that individual developments will obtain their own approvals does not resolve coincident pressure on a constrained resource.

10.4 Biodiversity, heritage, fire and aviation

CIC avoidance should not be achieved by disregarding biodiversity, waterways, Aboriginal cultural heritage or other communities. Those constraints must be visible in the same options comparison. The Groups seek proportionate surveys and assessment before decisions that foreclose alternatives, with later detailed plans used for implementation rather than to discover fundamental incompatibilities.

For aerial agriculture and firefighting, the assessment should identify actual operating areas and constraints, including airstrips, approach and departure paths, water-scooping locations and relevant operating conditions. Generic separation statements should be tested with the responsible operators and agencies. No finding is made here that all such operations would become impossible.

> RESPONSE REQUIRED

Publish a current, version-controlled account of project need, staging, constructability and resource assumptions, supported by independent scrutiny of the disputed issues. Explain how these matters affect the comparative justification for the route and the proposed CIC impacts.

11 | Consultation and assessment must remain capable of changing the outcome

The published exhibition period ends on 12 November 2026. The Groups request additional time proportionate to the volume and complexity of the material, and an opportunity to comment on substantive corrections, amended alignments and new specialist work before determination. This request is not an assumption that the existing period is legally invalid. The Groups will work to the published deadline unless an extension is formally confirmed.

The Groups request that technical corrections be carried through every report that relies on them. Correcting a map without revisiting an economic or noise conclusion based on the old distance would leave the underlying problem unresolved. Updated findings and the treatment of submissions should be accessible and traceable.

Engagement on access, safety, assessment or mitigation does not signify support for the project, acceptance of the alignment or agreement to acquisition. The Groups and participating landholders reserve their objections and rights. The same reservation applies to the fallback safeguards below.

12 | Specific determinations, information and safeguards requested

The following requests should be answered individually in the Submissions Report. The Groups ask the Department to distinguish matters essential to determining the acceptability of the route from implementation detail that can properly follow approval.

R1. Do not accept the current CIC conclusion without a corrected local assessment

Require a locality-specific assessment of the Gundy-Waverley-Kitchwin area and connected equine operations. It must address landscape, business function, health, operability, expansion and cumulative effects. Regional resilience must not substitute for a reasoned conclusion about concentrated harm.

R2. Establish one verified spatial and operating baseline

Publish the coordinated plan described in section 6, verify current operators and paddock uses, identify the Archibald receptor and reconcile the zero-distance, 800-metre and overlap statements. Reassess every material conclusion affected by a correction.

R3. Independently review landscape and visual effects

Inspect representative private and public viewpoints, disclose the modelling assumptions and compare verified current-condition photographs with the full project. Include both lines, clearing, access and ancillary works. Explain the treatment of local scenic and functional significance and revise it where the evidence requires.

R4. Assess actual business and expansion consequences

Test Kitchwin, The Barn, the Archibald operation and other affected businesses against their current operating models and credible future uses. Identify local costs and benefits, supply relationships, uncertainty and the consequences of relocating activity. Do not treat an overseas property discount or the survival of another stud as a substitute for local evidence.

R5. Obtain an independent equine-health and farm-operability review

Use specialists with appropriate equine, acoustic and environmental expertise, with access to the affected operations and their veterinary advisers. Address mares, foals, young stock, spelling horses, handling, helicopters, dust and relevant cattle-management interfaces. Explain how the evidence supports the criteria and controls proposed.

R6. Publish and independently test the eastern options

Identify the relevant Appendix B analysis and any subsequent local options. Publish maps, constraints, whole-of-life costs, uncertainty and reasons for rejection. Adopt and assess a feasible alternative that delivers a better overall outcome, rather than treating modest micro-siting as the only available response to a corridor-level objection.

R7. Demonstrate a workable construction and maintenance method

Before determination, establish that the significant activities can be undertaken without unacceptable interference with the verified breeding, foaling and calving calendars. Identify local durations and overlapping works. Do not rely on untested relocation capacity or a vague undertaking to consider sensitive periods.

R8. Define the protection required if residual impacts are accepted

Any approval should identify applicable no-tower, no-new-access, vegetation-retention and high-impact-work exclusion areas, with justified buffers and explicit performance requirements. These are requested site-specific safeguards, not assertions that a particular universal setback already applies. They should be linked to the verified baseline and the independent reviews.

R9. Control dust and intrusive aerial activity before relevant works

Require sealing or independently demonstrated equivalent protection for project access routes near sensitive equine areas, together with controls for construction dust and other disturbed surfaces. Establish a planned-flight protocol, clear responsibilities and pause or abort criteria. Notice alone must not be treated as effective mitigation where the underlying risk is unresolved.

R10. Apply safeguards to enabling works and later design changes

Ensure that the controls relevant to each activity are approved and operative before that activity starts, including road works, vegetation clearance and access-track construction. Detailed design must not move infrastructure closer to sensitive uses or introduce materially different impacts without the appropriate reassessment, consultation and approval process.

R11. Provide monitoring, accountability and a practical remedy process

Specify the responsible proponent and contractor obligations, monitoring locations and methods, reporting, independent audit and corrective action. Establish an accessible complaint and incident process, urgent veterinary and safety response arrangements, and mechanisms to document and resolve demonstrated losses. Compensation or insurance must not be used as a reason to accept otherwise unacceptable impacts.

R12. Allow a meaningful response to revised evidence

Publish material corrections and supplementary assessments before determination and allow a proportionate opportunity for affected people to respond. Where the required evidence does not establish that the alignment is acceptable, refuse that alignment rather than defer the fundamental question to a property-management plan.

Conclusion

The Groups' objection is not answered by saying that the Upper Hunter will remain an important breeding region after this project is built. The decision concerns whether the particular harm proposed here is justified, whether it can be avoided, and whether the practical operation and future capacity of this part of the CIC have been properly assessed.

Kitchwin's history, the supplied landscape photographs and the Archibald operational evidence put substance behind that question. The primary technical reports also identify the need for scrutiny: important receptor information was not verified on site; distance descriptions require reconciliation; the health analysis depends on qualified evidence and management assumptions; and the economic analysis relies heavily on regional resilience and the continued operation of businesses elsewhere.

The Groups seek a decision based on verified facts, genuine alternatives and protection that can be checked and enforced. If an acceptable alignment cannot be demonstrated through that process, the present alignment through the affected CIC locality should not be approved. The cumulative integrity of the cluster must not be reduced, project by project, to whatever is left after avoidable harm has been accepted.

Appendix A
Kitchwin photographic evidence and viewpoints for verification

All eleven landscape are photographs at Kitchwin. They are reproduced without adding proposed towers or altering their landscape content. They are a visual record and a basis for selecting assessment viewpoints.

The first image appears at the opening of the report.



> A2 - Stud Visual Amenity.
Open paddocks and enclosing ridgeline.



> A3 - Broad paddock view with mature trees and low hills.
Assess the connected landscape rather than an isolated tower footprint.



> A4



> A5 - Tree-lined access route.
How do energy Co propose they are to get 70m transmission lines past these trees, some dated at 200 years old



> A6 - Fenced working paddocks and hill backdrop with significant visual amenity impacts.



> A7 - Horses and young stock in an open paddock. **Dust virus issues remain an unanswered concern.**



> A8 - Mature tree beside managed equine land on Waverly Road. Assess retention and landscape contribution where works may interact.



> A9. Elevated view across the valley at Kitchwin top farm. The proposed transmission line is expected to significantly imact the studs visual amenity and therefore destroy Kitchwin's key appeal to breeders.



> A10 - Valley view with vegetation and proposed line visual to surrounding hills.



> A11 - Impacted hills, paddocks and vegetation in a closer landscape view.





SECTION **21**

Part B - Effects on the Upper Hunter Equine Critical Industry Cluster

EXECUTIVE SUMMARY

1. **The EIS concedes that the Equine CIC's landscape underpins the industry's reputation, then rates the part of it this project crosses as "relatively less critical".** It accepts that "the scenic values of the equine CIC are integral to the ongoing reputation of the industry" and that towers "may appear visually dominant in close proximity", but concludes that the corridor sits in "parts of the equine CIC that are relatively less critical to its core scenic and functional values". No property-level visual assessment of the Waverley–Kitchwin area supports that ranking. (Ch 11 §11.5.5, pp. 439–440)

2. **The economic test applied is whether the cluster survives, not whether the cluster is protected.** TR22 states that "even in the unlikely event that Kitchwin Hills were to relocate, the resilience and competitiveness of the Equine CIC would remain intact". It treats the Hunter Thoroughbred Breeders Association's concern about land identified for future breeding expansion as a matter of "individual properties rather than the capacity of the Equine CIC as a whole". It does not claim that the region's breeding environment, the attribute most exposed to the project, would remain unaffected. (TR22 §2.4.1, p. 19; §6.2, pp. 42–43)

3. **The basic facts about the most-affected business are inconsistent.** TR22 records Kitchwin Hills' Bottom Farm at "~0.0 km" from the transmission corridor, then rests its property-value conclusion on Kitchwin being "approximately 800 metres from the proposed corridor" and on the selected operations not intersecting the corridor. TR21 says Kitchwin paddocks "may partially overlap" the corridor; the same page says no paddocks are within it. At TR22's own tabled distance, the literature TR22 relies on reports a 16.3% sale-price discount. (TR22 Table 4.1, p. 24; §6.1.2, pp. 40–42; TR21 §6.3, p. 37)

4. **The horse-health conclusions rest on qualified evidence.** The 65 dB(A) threshold comes from a concert-noise study of horses in Flemington stables, which stated that "definitive criteria for exposing Thoroughbred horses to noise could not be established". Helicopter noise may exceed that threshold within about 550 metres; access-track works next to The Barn are predicted at up to about 75 dBA. TR21's own literature review identifies "a potential risk to foals" from *Rhodococcus equi* in construction soil, which the body of the report then sets aside. (TR21 pp. 30, 37, 39, 79, 95; TR22 §7.2.1, p. 50)

5. **"Temporary and manageable" is not tested against the way the farm works.** Breeding runs September to November and foaling August to December, every year of a construction program that runs from 2028 to 2034. Waverley Road also carries Camp 2 (a 780 ha acquisition), road upgrades, an optical repeater site and construction traffic. The management answer is to move horses "away from potential stressors", without saying where they would go. (TR22 p. v; Ch 3 Table 3.5, p. 103; Ch 13 §13.7, Measure EQ1, p. 548)

EXECUTIVE SUMMARY

6. **The route is defended by assertion.** The EIS says the Gundy and Waverly alignment was moved "as far east as practicable within the bounds of topography" but shows no eastern options, costs or reasons for rejection in the main volume. An option that cannot be built is different from one that costs more. (Ch 11 §11.3, p. 429; Ch 2 §2.7, p. 56)

7. **Every equine mitigation measure is consultation, notice or "consideration". None is a defined protection.** The EIS shows that binding limits are possible: it commits that "no transmission towers will be located within the 377 metre visual setback" for another receiver. No equivalent applies to any equine receiver in the CIC. (Ch 13 §13.7, EH1–EH9, EQ1–EQ2, pp. 546–548; Ch 11, Measure LV10, p. 467)

8. **What we ask:** (a) an independent, property-specific landscape and visual assessment of the Waverley–Kitchwin area before determination; (b) one verified map of the Kitchwin holdings against the corridor, with every distance-dependent conclusion re-run; (c) a CIC economic assessment that tests investment, expansion land and business attractiveness at the place affected, not only cluster survival; (d) an independent, property-specific equine health review; (e) a combined construction schedule for Waverley Road and the Kitchwin access tracks, with no high-impact works during breeding and foaling; (f) publication of the eastern route options with reasons for rejection, and adoption of a feasible eastern alignment through an amendment report if one exists; (g) binding no-tower and no-new-access areas, retained screening and measurable limits, applying from enabling works onward.

9. **Every one of these asks serves a single condition.** The Equine CIC is mapped NSW planning land that recognises an industry of national and international importance. Its value lies in connected businesses working in a particular landscape. The EIS assesses that land as a regional average and concludes that the cluster will survive. Until the impact on the CIC is assessed at the place where the project crosses it, with verified facts and tested alternatives, no conclusion that the impact on the CIC is acceptable should be accepted.

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1 | A recognised landscape rated "Less Critical"

1.1 Evidence

What the EIS concedes. The visual chapter accepts that the CIC's scenic quality is part of how the industry functions. The landscape character table rates equine CIC land at moderate sensitivity because "its scenic qualities and landscape setting contribute to its ongoing function, reputation and regional identity" (Ch 11, Table 11.1, footnote 12, p. 419). The chapter also identifies Waverley Road as one of the public corridors that "provide views to multiple studs, polo fields, and associated facilities, contributing to the collective perception and experience of the equine CIC" (Ch 11 §11.5.5, p. 440).

What the EIS concludes. The same section then finds that the Waverley Road and Timor Crawney Road areas "tend to be less strongly associated with the defining scenic and functional features of the equine CIC", and that the project sits "within parts of the equine CIC that are relatively less critical to its core scenic and functional values" (Ch 11 §11.5.5, p. 440).

Topic	What the EIS concedes	What the EIS concludes	Citation
Role of landscape	"The scenic values of the equine CIC are integral to the ongoing reputation of the industry"	The project would not "diminish the overall scenic quality and character that underpin the equine CIC at a regional level"	Ch 11 §11.5.5, p. 440
Local effect	Towers "may appear visually dominant in close proximity"	"These effects are generally confined and do not extend consistently across the broader landscape"	Ch 11 §11.5.5, p. 440
Waverley Road	Provides "views to multiple studs, polo fields, and associated facilities"	Not a "protected scenic route" or tourist drive, so has "a more limited role" in the CIC experience	Ch 11 §11.5.5, p. 440
Kitchwin Hills	Natural landscapes viewable from the property are "a key differentiator between Kitchwin Hills and other thoroughbred breeding businesses"	Changes in visual amenity near the Bottom Farm "would be minimal"	TR22 §7.1.2, pp. 48–49
Landscape sensitivity	CIC scenic qualities "contribute to its ongoing function, reputation and regional identity"	Rated "Moderate", the same rating given to forested foothills outside the CIC	Ch 11 Table 11.1, p. 419
Scope of assessment	Access tracks and road works are part of the project on and next to Kitchwin land	The landscape character study "does not include components such as roads and ancillary infrastructure"	Ch 11 §11.1.1, p. 415; Ch 12 §12.2.4.1, p. 484

> Table 1 - **What the EIS concedes about the CIC landscape, and what it concludes**

Scale of what is proposed. The project is a dual 500 kV double-circuit line on towers typically 45–75 metres high, spaced about 450 metres apart, on a 140-metre easement (TR22 §1.2.2, p. 2). The visual assessment assumes towers of 80 metres and applies a 377-metre visual setback for sensitive receivers on RU1 land (Ch 11 §11.1.2, p. 415).

Kitchwin and The Barn. TR22 relies on a desktop judgement that The Barn's main entertaining areas face north while the line lies to the east, and on a visual impact rating of "low" (TR22 §7.2.2, p. 51). It does not consider the stud tours, paddock visits and arrival views that make up The Barn's offering, which TR22 itself describes (TR22 §4.2.2, p. 30).

The Barn Scone's entire internal and external amenity is north facing with views to the north east and north west. This foundational amenity will without question be impacted by the proposed transmission route. The

yearling parade and entertainment area looks due East directly at the proposed route. Mare paddocks are located directly adjacent to the proposed route. Foaling paddocks and inspection lawn and client guest fcilities are again facing due east with direct impact on the visual amenity of this area. Mare paddocks 200m for Towers. Foaling 500m. Yearling and Stallion facilities 750m whilst The Barn has access road on its fron doorstep literally 10 metres away.

1.2 EIS shortcoming

- The "less critical" ranking is a regional judgement made from public roads. It is not supported by any assessment from the homes, guest accommodation, working paddocks or visitor areas of the CIC businesses closest to the line.
- Lower-order roads are treated as less important because they are not designated scenic routes or tourist drives. The CIC is a planning designation of land and industry, not of roads. Scenic-route status is not the test of whether an equine landscape matters.
- The landscape assessment excludes access tracks and road works (Ch 11 §11.1.1, p. 415), yet these are the elements placed on and beside Kitchwin land.
- A rating of "Moderate" sensitivity for land the EIS itself describes as integral to the reputation of an internationally significant industry is not explained.

1.3 Consequences

- Decision-makers are told that the part of the CIC affected matters less, without evidence from that part of the CIC. If the ranking is wrong, every downstream conclusion that relies on it (business attractiveness, visitor demand, property value) is wrong with it.
- A conclusion reached "at a regional level" cannot settle the impact here. The CIC is made up of individual places, and its reputation is experienced at them.

1.4 Position Sought

More work. Require an independent, property-specific landscape and visual impact assessment of the Waverley–Kitchwin area before determination. It should model both circuits, towers, access tracks, road works, Camp 2 and vegetation clearing, from the homes, The Barn and its outdoor areas, working paddocks, visitor areas and Waverley Road. The "relatively less critical" finding should not be accepted unless that assessment supports it.

2 | The Wrong Test: Cluster survival instead of cluster protection

2.1 Evidence

What the CIC is. CICs are "concentrations of highly productive industries within a region that are related to each other, contribute to the identity of that region, and provide significant employment opportunities" (TR22 §2.1, p. 8; Ch 12 §12.2.4.1, p. 484). The Upper Hunter Equine CIC covers 254,900 hectares and is described in TR22 as "one of the largest and most important thoroughbred breeding clusters in the world" (TR22 §2.1, p. 8). The EIS records that protecting this land is a regional strategic goal under Objective 9 of the Hunter Regional Plan 2041 (Ch 2, p. 40).

Measure	Hunter Valley	Share of NSW	Share of Australia	Citation
Broodmares covered (FY23)	5,537	67%	28%	TR22 Table 2.1, p. 12
Live foals produced (FY23)	3,582	67%	28%	TR22 Table 2.1, p. 12
Stallions (FY23)	101	61%	20%	TR22 Table 2.1, p. 12
Full-time equivalent employment	3,756	79%	41%	TR22 Table 2.1, p. 12
Total value added	$757.4 million	n/a	45%	TR22 Table 2.2, p. 12

> Table 2 - **Scale of the Hunter Valley thoroughbred breeding industry (as reported in TR22)**
Source: TR22 analysis of IER, Measurement of economic impact of the Australian thoroughbred breeding industry, March 2025.

How TR22 tests the impact. TR22 asks whether "an exodus of thoroughbred operations" could compromise the cluster and concludes that it could not (TR22 §6.2, p. 42). It then states:

> *"Even in the unlikely event that Kitchwin Hills were to relocate, the resilience and competitiveness of the Equine CIC would remain intact. In the past, the CIC has withstood the relocation or closure of prominent stud facilities." (TR22 §6.2, p. 43)*

The attribute TR22 does not defend. TR22 lists four reasons the Upper Hunter is attractive for breeding: proximity to ports and markets; reputation; service providers; and "an ideal environment for breeding thoroughbreds, including a temperate climate, protected aspect and varied terrain". It then says only that "at a minimum, the first three of these four attributes would remain unaffected" (TR22 §6.2, pp. 42–43). The fourth, the physical and landscape environment, is the attribute the project changes. TR22 nonetheless concludes from this that the project "is unlikely to deter studs from establishing or expanding into areas of the cluster near the corridor" (TR22 §6.2, p. 43).

Expansion land. In February 2026 the HTBA told EnergyCo that the project is located in areas it had identified as potential locations for expanded thoroughbred breeding, and that the project may make certain landholdings less suitable for breeding. TR22 records this as relating to "potential future land use decisions on individual properties rather than the capacity of the Equine CIC as a whole to continue operating or expand" (TR22 §2.4.1, p. 19). The EIS separately notes that "the total mapped area of equine CIC is considerably larger than the actual extent of established equine operations" (Ch 13 §13.2.2.2, p. 515). That mapped land beyond today's operations is the cluster's room to grow.

The brief TR22 was given. TR22's own scope included "implications for investment decisions, buyer and seller behaviour and demand for equine related land holdings" and the "ability of affected enterprises to retain and attract staff, clients and horses" (TR22 §1.3, p. 6). These are answered at cluster scale, not for the businesses and land the corridor crosses.

No industry data. HoustonKemp sought to engage equine stakeholders and "received no responses". Its conclusions "rely on publicly available information" (TR22 §1.3, p. 6). The Kitchwin profile is built from the stud's website, press interviews and Google Maps measurements (TR22 §4.2.1, pp. 26–30; footnote 124, p. 46). Kitchwin Hills have not been approached by Houstonkemp.

2.2 EIS shortcoming

- The CIC exists to protect a concentration of related businesses and the land they depend on. Asking only whether the cluster would collapse sets a test almost no single project could fail, and it does not measure the harm done to the cluster where the project crosses it.
- Describing the most-affected thoroughbred business as "comparatively small" (TR22 §6.2, p. 43), and its relocation as survivable, treats loss of CIC businesses as acceptable when it is the outcome the CIC designation exists to prevent.
- The HTBA's concern about expansion land is reclassified as an individual-property matter. The future capacity of a cluster is made up of individual properties.
- The conclusion that the project will not deter expansion near the corridor is drawn from three attributes TR22 says are unaffected, while the one attribute the project does affect is left unassessed.

2.3 Consequences

- If this test is accepted, any future project can cross the CIC on the same reasoning: the cluster is large, so the part affected does not matter. The CIC would protect only its centre, which is not what it was mapped to do.
- Investment decisions on land near the corridor (new studs, expansion, sale to breeders) are left unassessed. Lost investment does not appear in a regional competitiveness test.

> POSITION SOUGHT

More work. Require the Equine CIC assessment to be redone with industry participation (HTBA, affected businesses and agents who sell equine property). It should test: (a) whether the project reduces the attractiveness of existing businesses near the corridor to clients, staff and buyers; (b) the effect on mapped CIC land identified for future breeding; (c) the landscape attribute TR22 did not assess. The Department should not accept cluster survival as the test of acceptable impact on a Critical Industry Cluster.

3 | Basic facts about Kitchwin Hills are inconsistent

3.1 Evidence

Kitchwin Hills is the receptor the EIS identifies as having "the greatest potential to experience project-related impacts" (Ch 13 §13.3.4.2, p. 532). It operates two properties on Waverley Road about four kilometres apart, manages about 200 to 300 thoroughbreds and employs 20 staff (TR22 §4.2.1, pp. 26, 29). The EIS and its two equine reports describe its relationship to the project in at least six different ways.

Document	What it says	Citation
EIS Ch 12	Access-track infrastructure "is proposed on a landholding associated with the Kitchwin Hills Horse Stud", on a parcel "located on the opposite side of Waverley Road from the main property"	Ch 12 §12.2.4.1, p. 484
EIS Ch 13	Impacts arise "due to the location of the transmission corridor and associated access tracks within and adjacent to the property"	Ch 13 §13.3.4.2, p. 532
TR21	"Portions of the property overlap with, or are immediately adjacent to, the project area and transmission corridor"	TR21 §6.1, p. 35
TR21	Identified paddocks "are located immediately adjacent to, and may partially overlap with, sections of the transmission corridor where helicopter stringing activities may occur". Same page: "No identified equine facilities or paddocks are located within the transmission corridor"	TR21 §6.3, p. 37
TR22	Bottom Farm: ~0.0 km to project area, ~0.2 km to transmission corridor. 10metres from access tracks. TopFarm: ~2.0 km to project area, ~2.6 km to corridor	TR22 Table 4.1, p. 24
TR22	Kitchwin "is approximately 800 metres from the proposed corridor"; the conclusion "holds for all of the selected operations given that they do not intersect with the proposed transmission corridor"	TR22 §6.1.2, p. 42
TR22	Five other studs are "situated closer to 330 kV transmission infrastructure than is Kitchwin Hills to the proposed transmission corridor"	TR22 §7.1.2, p. 48
TR22	Distances to paddocks and buildings were estimated "using Google Maps' measurement feature"	TR22 footnote 124, p. 46

> Table 3 - **How the EIS describes the position of Kitchwin Hills**

Why the distance matters: TR22's own literature. TR22's finding that sale prices are unlikely to be affected depends on the 800-metre figure. It cites Chalmers (2012), who found no significant effect beyond 305 metres, and the EirGrid study (2016), which found none beyond 250 metres (TR22 §6.1.2, p. 42). The same Chalmers study found that rural lots within 152 metres of a 500 kV line sold at a 16.3% discount, and lots 153–305 metres away at a 13.9% discount (TR22 §6.1.1, p. 40). The EirGrid survey of estate agents reported a median 10% decline in the value of agricultural property near a line during construction, falling to 5% after (TR22 §6.1.1, p. 41). At the "~0.0 km" distance in TR22's own Table 4.1, its own sources point the other way.

Why the distance matters: the floating footprint. The EIS seeks approval for final siting anywhere within the project area (Ch 6 §6.3, pp. 211–212). Distances measured to an indicative alignment can change at detailed design.

3.2 EIS shortcoming

- No single, verified map in the EIS shows Kitchwin's property boundaries, working paddocks, homes, guest areas, towers, easement and access tracks together.
- Different measurement points may explain some of the differences, but none is identified. Distances were measured by desktop estimate rather than survey.
- A conclusion (no effect on sale price) rests on a distance that another table in the same report contradicts.

3.3 Consequences

- The property-value conclusion, the noise and helicopter conclusions and the visual conclusion all depend on separation distance. If the distance is wrong, the conclusions need to be re-run, not just reworded.
- Mitigation measures EH1, EH2, EH4 and EH5 apply to facilities "within 800 m" of the project area or corridor (Ch 13 §13.7, pp. 546–547). An unverified distance determines who is covered.

> POSITION SOUGHT

More work. Require EnergyCo to publish one surveyed map of the Kitchwin holdings, agreed with the landholder, showing property boundaries, working paddocks, homes, The Barn, guest and visitor areas, towers, easement, access tracks and road works. Every conclusion in Chapters 11 and 13, TR21 and TR22 that depends on separation distance should then be reassessed against it, and the result published before determination.

4 | Horse-health conclusions rest on qualified evidence

4.1 Evidence

The noise threshold. TR21 applies a threshold of 65 dB(A) LAeq, described as "recommended by Huybregts (2008) for horses in stables" (TR21 §5.2.1.3, p. 30). That study assessed whether a music festival at Flemington Racecourse would be acceptable for horses stabled there. Its authors "concluded that, although definitive criteria for exposing Thoroughbred horses to noise could not be established, a practical threshold level would be valuable", and recommended that stable noise "not exceed 65 dBA" (TR21 Appendix B, p. 79). The horses concerned were racehorses in stables, already exposed to race-day noise of 65–90 dB(A).

Activity	Exceeds 65 dB(A) within	Relevance to Kitchwin	Citation
Access track construction	About 140 m	Access tracks run "adjacent to the existing property boundary / fence line" of a Kitchwin parcel	TR21 §6.1, p. 35; Ch 12, p. 484
Vegetation clearing	About 160 m	Easement and track clearing within and beside Kitchwin land	TR21 §6.1, p. 35
Foundation works with rock breaking	About 200 m	Nearest indicative tower to working paddocks	TR21 §6.1, p. 35
Helicopter operations (stringing)	About 550 m	Bottom Farm paddocks "immediately adjacent to, and may partially overlap with" stringing sections	TR21 §6.3, p. 37
Access-track works next to The Barn	Predicted at up to about 75 dBA at The Barn	Guest accommodation on the Bottom Farm	TR22 §7.2.1, p. 50 ("figures provided by EnergyCo")

> Table 4 - **Predicted distances at which construction noise exceeds 65 dB(A), against Kitchwin Hills**

What TR21 itself says about thoroughbreds. Thoroughbreds "may be disproportionately affected", showing "stronger internal reactions and emotional agitation to unfamiliar sounds"; about 22% of horses "display persistent noise anxiety that does not resolve with exposure"; and intermittent helicopter activity "may limit habituation by reintroducing occasional unpredictable noise events" (TR21 §5.2.1.4, p. 31). Habituation to a new noise type "takes approximately one month" (TR21 Appendix B2, p. 80), while construction moves through the area in campaigns of different activities.

Dust and Rattles. In the body of the report, TR21 says the *Rhodococcus equi* risk "is generally associated with existing horse-related land uses and is not expected to represent a significant project-related risk" (TR21 §6.5, p. 39). Its own literature review concludes: "A potential risk to foals therefore exists from increased short-term dust exposure, especially where R equi bacteria may be present in significant concentrations within the topsoil of areas earmarked for construction" (TR21 Appendix D1.5.2, p. 95). An established stud is exactly that land use. No soil testing is proposed.

The nine independent reports compiled, including research by Muscatello and colleagues (2006 and 2009), the RIRDC stud-management report, the ACVIM veterinary consensus statement, the 2025 Australian equine antimicrobial guidelines, recent AgriFutures research, and the NSW EPA and international construction dust guidelines, identify a significant equine health risk requiring specific consideration in the EIS. The research establishes that Rhodococcus equi, the bacterium responsible for rattles pneumonia in young foals, is commonly acquired through inhalation of contaminated airborne dust, with Australian studies identifying

associations between disease prevalence, airborne bacterial concentrations, dry conditions and sparsely grassed laneways and holding areas. The reports also highlight the potentially serious animal health, veterinary treatment and commercial consequences for thoroughbred breeding operations. Construction dust guidance identifies unsealed access roads and heavy vehicle movements as important sources of airborne particulates.

These findings warrant an independent, property-specific veterinary and environmental assessment of construction activities, access roads, vehicle movements and dust dispersal around Kitchwin's breeding paddocks, including examination of historical foal health records and existing biosecurity practices. Section 4.2 should require EnergyCo to demonstrate how these risks will be prevented, including sealing all proposed access roads near breeding operations unless independently verified alternative controls provide equivalent protection, rather than relying on generic dust suppression commitments. Importantly, the research does not establish that the project will cause rattles outbreaks, but it provides a scientifically credible basis for requiring EnergyCo to assess and mitigate this potentially serious risk before concluding that impacts on breeding operations are manageable.

Source: https://drive.google.com/file/d/1PxUjibxLgFhEEVdYz5oEdXmOaYAQ2lA0/view?usp=drive_link
@https://drive.google.com/file/d/1qRM86dQP7oYzfTLkc0ysqnW1AAxODkE4/view?usp=sharing
@https://drive.google.com/file/d/16344DQNVosBj_EsMExblF5W1Gi5Oo-zL/view?usp=sharing
@https://drive.google.com/file/d/1lPh1F6we0BGpWZQSRWuAk-dNiVeYmgdZ/view?usp=sharing
@https://drive.google.com/file/d/1PZOnO5wpULiu6O2aKNNDp-NKsSygWiNb/view?usp=drive_link
@https://drive.google.com/file/d/1aaXwQuroKV7d3m_tCxE1z4PLi1nfNevy/view?usp=drive_link
@https://drive.google.com/file/d/1yMwmMSGSxCVAqqsBrOV3bmJHQxPhwrVc/view?usp=drive_link
@https://drive.google.com/file/d/1zwgCH_ntL_2rNIyQgwWF7AxmyAVR1gGo/view?usp=drive_link
@https://drive.google.com/file/d/1d32MxHabhmCEMGzeIgx44mu4581wGP7_/view?usp=drive_link

EMF and light. "No controlled studies have examined the effects of EMF on horses. The evidence base for equine-specific effects is entirely absent" (TR21 §5.1.6, p. 28). Light of 10 lux can influence a mare's breeding cycle (TR21 §5.5, p. 34). Night works near equine paddocks are excluded only "where practicable" (TR21 §6.7, p. 40).

Towers in horse paddocks. TR21's fencing guidance begins: "Any transmission tower located in a paddock accessible by horses must have appropriate fencing erected around it" (TR21 Appendix E1.1, p. 96). The main assessment says no equine paddocks are within the corridor (TR21 §6.3, p. 37).

4.2 EIS shortcoming

- A threshold its source study called provisional, set for stabled racehorses during a concert, is applied as a settled criterion to broodmares, foals and young stock running free in open paddocks.
- The qualifications in TR21's appendices (no definitive criteria, a potential risk to foals, no equine EMF studies) do not carry through to the executive summary, which concludes that impacts are "localised, temporary and manageable" (TR21 p. i).
- No assessment is made of the outcomes a breeder would measure: conception, pregnancy loss, foaling problems, foal health, yearling preparation and sale value.

4.3 Consequences

- If the threshold is not valid for open-paddock breeding stock, the distances in Table 4 understate the area of disturbance, and paddocks beyond them are also at risk.
- Losses in a thoroughbred breeding operation are concentrated in a few high-value animals. A single lost foal or injured mare is a material loss that does not appear in a "short-term behavioural response" finding.

> POSITION SOUGHT

More work and specific protection. Require an independent, property-specific equine health review for Kitchwin Hills before determination, prepared with the stud's veterinarians. It should cover noise criteria suitable for mares and foals in outdoor paddocks, helicopter exposure, pre-construction soil testing for *R. equi* along tracks and work areas, lighting and the qualifications in TR21's appendices. Its findings should set conditioned, measurable limits (noise at the paddock boundary, helicopter exclusion distances and dust controls).

5 | "Temporary and Manageable" is not tested against the Working Farm

5.1 Evidence

The breeding calendar. TR22 records that Kitchwin's sensitive periods are breeding from September to November and foaling from August to December (TR22 p. v; §4.2.1, p. 29). Construction of the project runs about six years, from 2028 to 2034 (TR22 §1.2.3, p. 5). Each tower takes "two to three months, or longer" across three separate crews "with some pauses in work between each crew" (TR22 §2.2, p. 13).

Month	Kitchwin activity	Share of each construction year
August	Foaling	5 of 12 months (about 42%) fall in breeding and/or foaling, in each of the six construction years 2028–2034
September–November	Breeding and foaling	
December	Foaling	
January–July	Weanling and yearling sales preparation and other operations	Remaining 7 months

> Table 5 - **Kitchwin Hills sensitive periods against the construction program**

Source: TR22 p. v and Figure 4.2, p. 29; TR22 §1.2.3, p. 5.

Everything else on Waverley Road. The construction picture around Kitchwin is not one tower. It combines:

- Camp 2, Waverley Road: a workforce accommodation camp on a 780 ha full acquisition, used for the duration of construction, with a highly noise-affected receiver and a medium unmitigated dust risk (Ch 3 Table 3.5, p. 103; TR22 §1.2.2, p. 3; Ch 16, p. 602; Ch 20, p. 726).
- An optical repeater station proposed at Waverley Road, beside the dual 500 kV line (Ch 3, p. 95).
- Road upgrades on Waverley Road and at the Waverley Road–Gundy Road intersection, and access tracks beside the Kitchwin parcel (TR22 §4.2.3, p. 30; Ch 12, p. 484).
- Construction traffic: about 56 light and 12 heavy vehicles at peak (128 passenger car units) on a road with a capacity of 270 passenger car units per lane per hour. Waverley Road's level of service falls to B or C at peak and it is named among the roads most at risk of accelerated pavement damage (TR22 §7.1.1, pp. 44–45; Ch 14, pp. 560, 564).
- Helicopter stringing along sections next to Bottom Farm paddocks, and later helicopter inspections, for which Kitchwin is "the receptor most likely to experience operational impacts" (TR21 §6.3, p. 37; Ch 13 §13.4.4.2, p. 538).

The management answer. Measure EQ1 provides for a property management plan covering, among other things, the "movement of horses away from potential stressors created by construction activities" (Ch 13 §13.7, Measure EQ1, p. 548). TR21 refers to "temporary management or relocation of horses from paddocks" (TR21 §6.1, p. 36). Neither says where the horses would go, whether there is enough suitable land on the holdings, what happens to mares close to foaling, or who bears the cost.

Mares and foals bottom farm Aug-December 100/70. Paddocks within 140m = 15. 200 = +5. 550m +10>Alternative paddocks do not exist as most of bottom farm breeding paddocks are on the eastern side of Waverly road. Cost of agistment - https://kitchwin.com.au/wp-content/uploads/2022/08/Agistment-Rates-NEW-2022.pdf

The Barn Scone's entire being is centred on a serene, clean, peaceful experience. With access tracks literally metres away from the back door this is expected to destroy the environment it was established for with bookings to collapse.

5.2 EIS shortcoming

- "Temporary" is measured per tower. For a business with fixed annual breeding and foaling seasons, a six-year program with campaign works, a camp on the same road and later helicopter inspections is not temporary in any practical sense.
- Traffic is assessed against road capacity, not against the effect of heavy vehicles on horse floats, mares and foals moving on a single access road. Totals across the project are not the relevant figures; Waverley Road and the Kitchwin tracks are.
- No combined schedule of road works, tracks, towers, camp operation and helicopters is presented for Waverley Road.

5.3 Consequences

- The real disruption, and its cost, is left to a post-determination property management plan written without a standard.
- If works cannot be scheduled outside breeding and foaling, the costs fall on the business: agistment elsewhere, lost covers, lost guest income and lost sale value.

> POSITION SOUGHT

Specific protection and more work.

a. Require a combined construction schedule for Waverley Road, the Kitchwin access tracks and nearby tower sites before determination.

b. Condition that no high-impact works (helicopter operations, vegetation clearing, track construction or rock breaking) occur within a defined distance of Kitchwin paddocks during August to December.

c. (c) Require EnergyCo to identify, with the landholder, where horses could be moved, to confirm the area is adequate, and to bear the cost of relocation, agistment and lost income.

6 | The Route: "As far east as practicable" is asserted, not shown

6.1 Evidence

The visual chapter records that at both Gundy and Waverly the community asked for the alignment to be moved "as far east as possible". At Gundy, this was to "limit impacts to dwellings and equine facilities (including Scone Polo Club)". In both places the EIS says the project area "has been moved east as far as practicable within the bounds of topography" (Ch 11 §11.3, p. 429).

The EIS also states that the move to a new study corridor in October 2025 "improved constructability, reduced steep terrain constraints and construction risks", and that there are "ongoing opportunities for further avoidance and minimisation to be considered during detailed design" (Ch 2 §2.7, p. 56). It says route selection "largely avoided" (not wholly avoided) direct impacts to equine facilities and paddocks (Ch 13 §13.3.4.2, p. 532). Route options are set out in Appendix B (Route options and avoidance paper).

The EIS already has a process for changes. TR22 notes that two recently identified camp sites "will be assessed as part of the Submissions Report/Amendment Report" (TR22 §1.2.2, p. 3). A realignment can be assessed in the same way.

6.2 EIS shortcoming

- "Practicable" is not defined. The main volume does not show whether an eastern alignment is physically impossible, or is possible at higher cost, with more steel, longer access tracks or harder construction.
- No comparison is presented of the CIC impact of the current alignment against an eastern alternative, including access tracks, construction arrangements, other landholders and environmental effects.
- The justification for crossing the CIC here is the justification for the project as a whole. The EIS does not show why this particular damage is necessary.

6.3 Consequences

If a credible eastern alternative exists, the impacts described in Sections 1 to 5 are avoidable rather than necessary. Avoidable harm to a Critical Industry Cluster is a different matter for a decision-maker from unavoidable harm.

> POSITION SOUGHT

More work. Require EnergyCo to publish, before determination, the alignment options considered east of the current Gundy–Waverly alignment, each with its constructability constraints, cost difference, access-track requirements and impacts on other landholders and the environment, and the reason for rejection. Where an option is feasible and reduces the CIC impact, require its adoption. If it lies outside the assessed project area, require it to be assessed through an amendment report on which affected parties can comment.

7 | Mitigation is consultation, not protection

7.1 Evidence

Measure	What it requires	What it does not require	Citation
EH1	Verify equine facilities and paddocks within 800 m before construction	Any change to tower or track siting as a result	Ch 13 §13.7, p. 546
EH2, EH3	Consultation with landholders, including on timing of works next to Kitchwin paddocks	Any outcome of that consultation	Ch 13 §13.7, p. 546
EH4	At least 72 hours' notice of helicopter stringing and similar works	Any limit on when or where they occur	Ch 13 §13.7, p. 546
EH5	Timing of noisy works "will consider" breeding and foaling, "where reasonably practicable"	Avoidance of breeding and foaling seasons	Ch 13 §13.7, p. 547
EH6–EH9	Standard dust, erosion, fencing repair and earthing measures	Equine-specific limits; R. equi soil testing	Ch 13 §13.7, p. 547
EQ1	Property management plan for Kitchwin and The Barn, covering access, timing, noise in sensitive periods and moving horses	Any defined standard, limit or no-go area	Ch 13 §13.7, p. 548
EQ2	Consultation with Gundy Park Equine and Scone Polo Club to avoid or minimise impacts "where practicable"	Any outcome	Ch 13 §13.7, p. 548

> Table 6 - **Equine mitigation measures and what each one binds**

Clear restrictions are possible. For private receiver I-7 DB1, the EIS commits: "No transmission towers will be located within the 377 metre visual setback identified for receiver I-7 DB1. This setback will be mapped and managed as a visual exclusion zone" (Ch 11, Measure LV10, p. 467). The EIS also uses mapped no-impact areas for heritage and biodiversity (Ch 2 §2.7, p. 56). No equivalent measure applies to any equine receptor in the CIC.

Enabling works come first. Enabling works, which include access tracks and road upgrades, "can begin prior to the approval of environmental management plans for main construction activities, including the CEMP" (Ch 25 §25.2.1, p. 820; TR22 §1.2.3, p. 5).

7.2 EIS shortcoming

- Every equine measure depends on consultation and good will after approval. None gives the landholder or the Department a standard against which compliance can be checked.
- Defined protections are applied to a visual receiver, Aboriginal heritage and biodiversity, but not to the receptor the EIS itself identifies as most exposed in a Critical Industry Cluster.
- Access tracks and road works next to Kitchwin may be built as enabling works, before the main environmental management plans exist.

7.3 Consequences

Protection of the CIC at this location is deferred until after approval, when the alignment is fixed and the landholder's position is weakest.

> POSITION SOUGHT

Specific protection. Before the route is accepted, condition: (a) mapped no-tower and no-new-access areas for Kitchwin's working paddocks, homes and The Barn, on the model of Measure LV10; (b) retention of existing screening vegetation and agreed supplementary planting; (c) measurable noise, dust and helicopter limits at equine paddock boundaries; (d) a seasonal restriction on high-impact works during August to December; (e) that these protections, and an agreed property management plan, apply before any enabling works on or next to the property.

8 | The CIC test the EIS did not apply

8.1 The record

The EIS gives Kitchwin Hills and The Barn more specific attention than any other landholding in the CIC. They are the only equine businesses named in a dedicated management measure (EQ1), and the only equine receptor named in Measure EH3. That attention confirms what the EIS concedes elsewhere: this is the most sensitive part of the proposed route through the CIC.

This section is not one landowner objecting to transmission lines. Kitchwin Hills is an established thoroughbred breeding operation inside a Critical Industry Cluster that the NSW Government mapped for its importance to the region, and that the Hunter Regional Plan 2041 seeks to protect (Ch 2, p. 40). Gundy Park Equine, Scone Polo Club, Main Camp Brooker and Bydand Stock Horses sit along the same corridor and roads (TR22 §4.2, pp. 26–32).

8.2 What the EIS never assessed

- The landscape of the affected part of the CIC, from the places where the industry operates (Section 1).
- The effect on investment, expansion land and business attractiveness at the place affected, rather than on the cluster's survival (Section 2).
- A verified position of the most-affected business relative to the corridor and tracks (Section 3).
- Equine health criteria suited to breeding stock in open paddocks (Section 4).
- The combined construction program on Waverley Road against the breeding calendar (Section 5).
- The eastern alternatives and why they were rejected (Section 6).

> POSITION SOUGHT

More work before determination. The Department should find that the EIS does not adequately assess the project's impact on the Upper Hunter Equine CIC. It should require the work in Sections 1 to 7 to be completed and published before any determination. It should not accept the current alignment through the Gundy–Waverly section of the CIC until a feasible eastern alternative has been shown not to exist, or, if one exists, until it has been adopted and assessed.

Sources

EIS (primary)

- EnergyCo (2026) New England Renewable Energy Zone Network Infrastructure Project, Environmental Impact Statement (SSI-74175972), main volume. Chapters cited: Ch 2 (pp. 40, 56); Ch 3 (pp. 67, 95, 103); Ch 6 §6.3 (pp. 211–212); Ch 11 (pp. 415, 419, 429, 432, 439–440, 447, 467); Ch 12 (pp. 484, 497); Ch 13 (pp. 511–515, 532–533, 537–538, 546–548); Ch 14 (pp. 560, 564); Ch 16 (p. 602); Ch 20 (p. 726); Ch 25 §25.2.1 (p. 820).
- EnergyCo (2026) EIS Appendix B: Route options and avoidance paper.

EnergyCo technical reports (secondary)

- Kannegieter Equine Specialists (2026) Equine Health Impact Assessment: New England REZ Network Infrastructure Project, August 2026. EIS Technical Report 21 (TR21).
- HoustonKemp (Houston, G., Mulready-Zenere, K. and Vyas, A.) (2026) Impact assessment of New England REZ on the Upper Hunter Equine CIC: A report for EnergyCo, September 2026. EIS Technical Report 22 (TR22).
- Moir Studio (2026) Landscape Character and Visual Impact Assessment, EIS Technical Report 5 (as cited in Ch 11 and TR22 §7.2.2).
- SLR (2026) Noise and Vibration Impact Assessment; Aurecon (2026) Traffic and Transport Impact Assessment, Revision J (as cited in TR21 and TR22).

Research cited in the EnergyCo reports

- Huybregts, C. (2008) noise impact assessment for a proposed music festival at Flemington Racecourse (as cited in TR21 Appendix B, p. 79).
- Chalmers, J. (2012) Transmission line impacts on rural property value. Right of Way, May/June 2012, pp. 31–34 (as cited in TR22 §6.1.1).
- Corr and Insight (2016) An investigation into the potential relationship between property values and high voltage overhead transmission lines in Ireland, part one – report. EirGrid (as cited in TR22 §6.1.1).
- Muscatello, G., Gilkerson, J.R. and Browning, G.F. (2006) Rattles in horses: effects of stud management on ecology of virulent Rhodococcus equi. RIRDC Publication No. 06/097 (as cited in TR21 Appendix D).
- Riva, M.G. et al. (2022), on persistent noise anxiety in horses (as cited in TR21 §5.2.1.4, p. 31).
- IER (2025) Measurement of economic impact of the Australian thoroughbred breeding industry, March 2025 (as cited in TR22 §2.1.3).

Planning and policy

- NSW Department of Planning and Infrastructure (2012) Upper Hunter Strategic Regional Land Use Plan.
- NSW Government (2014) Frequently Asked Questions: Critical Industry Clusters Upper Hunter, January 2014.
- NSW Department of Planning and Environment (2022) Hunter Regional Plan 2041, Objective 9 (as cited in EIS Ch 2, p. 40).
- State Environmental Planning Policy (Resources and Energy) 2021 (NSW).

Media and public record

- Devney, E. (2026) "'We've got to make a stand': renowned breeder ready to face down energy giant." The Land, 14 January 2026 (as cited in TR22).
- Jenkins, P. (2026) "Top stud owner warns energy project will 'ruin' Hunter's elite horse precinct." The Daily Telegraph, 11 June 2026 (as cited in TR22).

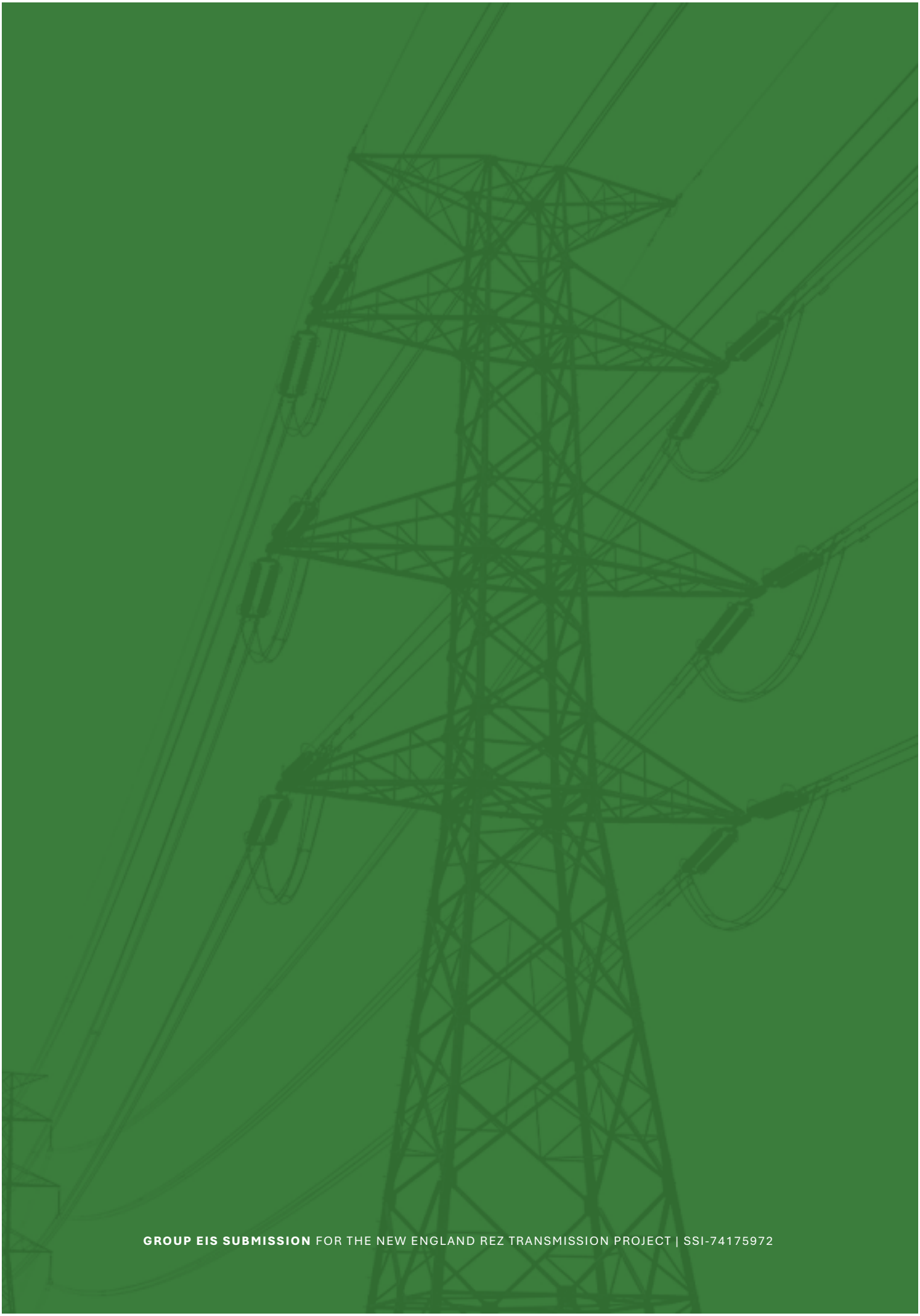
Community and landholder data

- Kitchwin Hills, review of the EIS provided to the committee, October 2026.

SECTION **22**

Historic Heritage

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 21

Historic Heritage

Key issues we have found ...

Historical surveys leave major gaps	Most of the project area remains unsurveyed, and specialist inspections covered only a fraction of locations initially identified through research.
Local knowledge was largely missed	Local historians, societies and many landholders were not properly engaged, leaving valuable knowledge of unrecorded places outside the heritage assessment.
Hidden heritage is being discounted	Desktop assumptions minimise archaeological potential, despite field surveys discovering unrecorded items and historical records identifying huts and outstations requiring
Living landscapes lack proper assessment	The assessment recognises pastoral landscapes and community connections, yet does not properly assess their significance or rate the proposed transformation.
Historic settings lack adequate protection	Visual assessments rely on public viewpoints, overlooking views from historic properties, while specific measures to mitigate visual impacts remain undeveloped.
Complete heritage assessment before approval	Complete specialist surveys, consult local communities, assess landscape impacts and publicly exhibit the findings before approving potentially damaging project works.

Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter | Voice for Walcha

Read in more detail >



> The Twenty Foot Waterfall on Tomalla Creek - 500m as crow flies from transmission line route

SECTION **22**

Historical Heritage

SUMMARY

The historical heritage assessment relies on a survey that covered about 46% of the project area. That figure is itself borrowed from the Aboriginal heritage team's sampling. It inspected 30 of the 131 locations its own desktop research first identified. The assessment then concludes that heritage impacts are "generally low" and largely avoided. Those conclusions can't be supported for the unsurveyed land.

The EIS attributes the gaps to land access, but provides no record of access being sought. Heritage consultation was a single online question, asked after field survey had ended. Visual and cultural landscape impacts are understated and mostly absent, and the remaining assessment is deferred to "detailed design" and a management plan prepared after approval, out of public view. Local voices, knowledge and concerns are clearly absent from the document. As a result, the EIS does not meet several of the historical heritage requirements Heritage NSW set for it (the SEARs).

POSITION

We consider the historical heritage assessment incomplete, history-lite, and not a sound basis for determination.

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Why this landscape matters

Much of the project area is a living heritage landscape, where the natural country and nearly two centuries of pastoral life are bound together. Oxley crossed this country in 1818, and squatters took up runs here from the early 1830s. The pattern they set down is still visible: stations and family holdings, homesteads tucked into sheltered valleys, woolsheds and yards, stock routes and early roads following the ridges, and old huts, gold workings and graves scattered through the back country. All of it sits within open granite and basalt country, remnant woodland, rivers and gorges, and long, uninterrupted views. Generations of the same families have worked this land, and the district's identity, comes from that continuity. This is a living landscape, largely unchanged since the 1800s. The EIS doesn't acknowledge that the transmission project also passes through barely cleared areas of farmland that have been nurtured by landholders. An example can be seen in photo 1 showing a barely touched area directly in the transmission corridor.



> Figure 1 - barely touched farmland in the transmission corridor

The value of this landscape lies in the whole, not in any single building. TR3 itself says the region's cultural landscape is defined by "open grazing lands… homestead complexes… and long views across valley systems", and that its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape" (TR3 pp. 56–57). Communities told EnergyCo the same: TR3 records that the heritage-related feedback "primarily related to the natural landscape character of the project area" (TR3 p. 31).

Twin 500 kV lines would change this landscape dramatically and permanently. They would bring towers up to 75 m high every few hundred metres along each line, a 140 m cleared easement, new access tracks cut across

slopes and ridges, energy hubs and workforce camps. This isn't another layer on an existing pattern of infrastructure: there is none of this scale on the Walcha section. It would be the first industrial-scale intrusion into a landscape whose character has endured since settlement. Once built, it can't be undone.

The EIS does not appear to meet the Heritage NSW requirements (SEARs)

Heritage NSW set the historical heritage requirements for this EIS in its advice of 6 August 2024 (HMS ID 6859), reconfirmed on 15 January 2026 (HMS ID 13144). TR3 reproduces the advice in Table 1.2 (p. 6) but answers each requirement only with a general cross-reference. Checked against the assessment itself, several requirements are not met:

Heritage NSW requirement	What the EIS did	Met?
1. A Statement of Heritage Impact (SOHI) by a suitably qualified consultant	An HHIA was prepared by Umwelt (TR3)	In form
1a. Identify all heritage items (State and local) in the vicinity, including built heritage, landscapes and archaeology	Only *listed* items were searched for. Unlisted items aren't identified. About 54% of the project area wasn't surveyed.	No
1a. Detailed mapping of these items	Listed items are mapped. There's no map of which land was surveyed, and the cultural landscape isn't mapped.	Partly
1a. Assess why items are significant	Listed items were "not… subject to reassessment", and "a substantial number" of listings have no significance information (TR3 p. 8). The cultural landscape is described but never assessed against the heritage criteria (TR3 pp. 56–57).	No
1b. Compliance with any relevant conservation management plans	Not addressed. TR3 doesn't say whether any affected item has one, including the State-listed items.	Not addressed
1c. Impacts on significance, including visual	Listed items within 2 km only; unlisted historic places not assessed; cultural landscape impact acknowledged but not rated (TR3 p. 469).	Partly
1c. Vibration impacts during construction	50 m study area against a 65 m blasting distance, based on an uncapped 0.5 kg charge (TR3 pp. 37–38). Walcha Road Station isn't assessed.	Partly
1d. Attempts to avoid or mitigate impacts	No-impact areas and some route changes, none in Walcha Shire. "No specific management measures for visual impacts have been developed" (TR3 p. 481). Avoidance for unsurveyed land is deferred.	Partly
1e. Justify changes to fabric or landscape, including options analysis	No options analysis. At Barry Station, a moderate impact is accepted with no alternative considered, and a photographic record is the only response.	No
1. Potential impacts on unrecorded items "will also require assessment as part of the SOHI"	Deferred to an unexhibited Submissions Report addendum and a post-approval HHMP (TR3 pp. 484–485). 54% unsurveyed; 20 target sites uninspected.	No (deferred)
2. Archaeological assessment identifying likely relics, their significance and impacts	Done for 11 areas, none in Walcha Shire. "Generally low" potential assumed for unsurveyed land from desktop sources.	Partly
2. Where harm can't be avoided, prepare a Research Design and Excavation Methodology	Seven areas will be affected, but research designs are deferred to after approval (measures HH8–HH10).	No (deferred)

We ask that Heritage NSW be invited to confirm whether its requirements have been met.

1 | Most of the project area was never surveyed

- Only about **46%** of the project area had general survey, and only **30 of 50** targeted locations (60%) were inspected (EIS pp. 345–346; TR3 p. 20). The 46% is the area sampled by the **Aboriginal** cultural heritage teams, not historical heritage specialists (TR3 p. 20). Targeted historical heritage inspection totalled **12 days** across the whole project (TR3 p. 20).
- Desktop research first identified **131** locations, cut to 50 at the desk (TR3 p. 27). So **30 of 131** were inspected. The rest of the project area was screened out "based on a review of all available background information and mapping": by desktop alone.
- The EIS's own results show what desktop review misses. Of the 26 heritage items found in the project area, **15 were found only by walking the ground** (EIS p. 363, Table 9.3). On the same basis, the unsurveyed 54% is likely to hold many more unrecorded items. Elsewhere, survey of earlier route options and nearby land kept finding "former worker accommodation huts", "vernacular farm buildings" and items of "potential heritage value" (TR3 pp. 292–293).
- No map shows which land was actually surveyed. Landholders and the public can't tell what land was walked.

2 | Land access does not explain the gaps, and the route changed mid-survey

The EIS repeatedly blames "land access restrictions". TR3 itself shows other causes:

- **No record of access being sought.** "Land access was not provided" (TR3 p. 20) doesn't say access was requested or refused. TR3 gives no count of requests, refusals, dates or methods.
- **The route changed during the survey.** Survey ran from August 2024 to 13 March 2026 (TR3 p. 19), while the corridor was still being refined "mid-2024 to mid-2026" (TR3 p. 404). Parts of the area added in the October 2025 refinements weren't surveyed before the cut-off (TR3 pp. 276, 283). 80 of the 106 recording forms relate to earlier route options or land outside the project area. Only 26 relate to the current route (TR3 p. 290).
- **Landholders on the easement were not contacted.** The majority of landholders on the Walcha section weren't contacted by Umwelt or EnergyCo about historical heritage. Inaccessibility can't be the reason for a gap on land where no one asked.

If land access is relied on, EnergyCo should provide a property-by-property log of heritage survey access requests, with dates, methods and outcomes.

3 | Heritage consultation was inadequate

- **Absence of local voices.** The only heritage-specific community input was one general question ("Are there any places or things in the area that feel important or special to you…?") in an online SIA survey in April–May 2026, after field survey had ended on 13 March 2026 (TR3 pp. 19, 30). It got 90 responses across the whole route, with no breakdown by area. The earlier SIA survey (April–July 2025) had no heritage question and was run before the October 2025 route change, so respondents were commenting

on a corridor that no longer exists. It couldn't have informed where survey went, even though EIS p. 343 lists "community consultation findings including with landholders and occupiers" as an input to survey.

- **Landholder input was left to chance.** Landholder consultation was "informal", held during field visits with owners "if in attendance" (TR3 p. 28–30). Landholders whose land wasn't visited weren't consulted. Information EnergyCo gathered was passed on only "where relevant", as judged by the proponent (TR3 p. 30).
- **No heritage bodies consulted.** TR3 cites histories by local societies but records no contact with the Walcha Historical Society, the Walcha History Centre, Walcha Shire Council or local historians.
- Agency input at the SEARs stage came only from Heritage NSW, Uralla Shire Council and Tamworth Regional Council (TR3 Table 1.2).
- **Notable local publications not cited.** The published work of local historian Jillian Oppenheimer on the Walcha district's pastoral families and history is not cited, nor the notable "From Scone to the Head Waters of the Hunter: A Survey of Properties and People Following the Gundy Road and Various Side-roads Along the Way 1896-1897".
- **Living cultural landscapes are not valued.** TR3 acknowledges that consultation identified "cultural landscapes as key considerations" and that communities value "rural landholdings, natural landscapes and recreational areas" for "community identity and sense of place" (TR3 p. viii). TR3 also records that the responses relevant to heritage "primarily related to the natural landscape character of the project area" (TR3 p. 31). The assessment then treats the landscape as unaffected in its "underlying" values (TR3 p. 469), and does not assess the natural landscape as heritage at all.

This falls well short of the community consultation needed to identify unrecorded heritage.

4 | The "generally low" and "worst case" conclusions are unsupported

- **"Generally low" archaeological potential (**EIS p. 358; TR3 p. 193) rests on historical research, previous studies and field survey. But the EIS admits there is "a general absence of detailed archaeological investigations" in the project area. TR3 accepts this gap "may also be attributable to the limited extent of past development or disturbance" (TR3 p. 192). Land that has never been disturbed is where remains are most likely to survive.
- **The wrong test.** The rating leans on there being no "homestead or head station" in the project area (TR3 p. 193). But a transmission line crosses back paddocks and run boundaries, where outstations, shepherds' huts, yards, shacks and mining camps were. TR3 records "at least eight huts" on the Aberbaldie run alone, none located (TR3 p. 132).
- **Field finds discounted for not being on old maps.** Only 2 of the 15 items found by walking went on to formal significance assessment (EIS pp. 364, 371). Items were screened out partly because they didn't appear in historical mapping, the same sources that missed them.
- **"Worst case" is a worst case of where, not what** (TR3 p. 35). Assuming disturbance could occur anywhere in the project area only covers known items. With about 54% unsurveyed, the inventory is incomplete. TR3 also states the approach is "to provide the project with flexibility for detailed design".
- **Cropped evidence.** Four pastoral plan figures are cropped to show only the head stations, with captions noting the project area is "outside of the image": Figures 6.32, 6.40, 6.42 and 6.45 (TR3 pp. 116, 132, 134, 137). The parts of the plans that would show huts and outstations near the line are not shown.

5 | Visual impact, and the natural and cultural landscape, are understated

TR3's own description of the cultural landscape (Section 5.5, pp. 56–57) shows why the impact is substantial. It defines the landscape by its "open grazing lands… cleared paddocks, homestead complexes… and **long views across valley systems**", and says its significance depends on "the persistence of land use patterns, spatial relationships and community connections to the landscape". There are areas that are basically untouched which is not really evident from the EIS (as shown in Photo 1).

Twin 500 kV lines on towers up to 75 m high, a 140 m easement and new access tracks would cut directly across those long views, open grazing lands and destroy the barely touched areas. Substations, workers camps and transmission is a fundamental alteration of a living heritage landscape. The project is bringing industrial infrastructure to a region where the landscape has remained largely unchanged since at least the 1800s as seen in Photo 2 looking north along the transmission path. TR3 states the landscape "is not defined by individual heritage items", yet the cultural landscape itself is never assessed for significance against the NSW heritage criteria or given an impact rating. Calling it "not rare at a state level" doesn't lessen it: TR3 accepts it is "a representative example" of NSW pastoral development, and that is itself a recognised heritage value.

- **Assessed from the road, not the homestead.** Listed items were viewed from public roads, and in some cases by Google Street View and aerial imagery (TR3 pp. 28, 244). Every photomontage was taken "from the closest public location" (TR3 pp. 456–460). The views that matter most to a homestead's setting were never modelled.
- **Ratings understate proximity.** Homestead "Warrane" is 0.95 km from the nearest tower, yet the impact is rated "low" (TR3 p. 457). Only the nearest tower is considered, not the several towers and spans of twin lines on 45–75 m towers about every 450 m along each line. The Timber house (I82) was rated "negligible" although TR3 couldn't identify which building is listed (TR3 p. 458). Belltrees was rated without property access (TR3 p. 460).
- **No mitigation.** "No specific management measures for visual impacts have been developed" (TR3 p. 481). At Barry Station, the only item rated "moderate", the response is archival recording.
- **The landscape is physically changed, not just seen differently.** TR3 calls the project "incremental layering" consistent with an "established pattern", and says "underlying cultural landscape values… are not fundamentally altered" (TR3 p. 469; EIS p. 376). A 140 m cleared easement, lines of large towers across ridges, access tracks, hubs and camps alter the fabric of the natural landscape the community has said is central to its identity (TR3 p. viii). No existing transmission line, extractive industry or built renewable project is named on the Walcha section. The modification TR3 relies on is in the Upper Hunter.
- **Two standards.** TR3 accepts that in "less modified" areas with "more intact rural character", such as Rouchel Brook and Gundy, the project "has greater potential to introduce perceptible change" (TR3 p. 470). The Walcha Tablelands meet that description but were never assessed on that basis.
- **The cumulative conclusion is unsupported. It** holds only "subject to implementation of the recommended mitigation" (EIS p. 376), but no landscape mitigation exists. It is tested "at a regional scale", which hides concentrated local loss, and it omits the REZ generation projects the line exists to connect.



> Figure 2 - Pastoral landscape along the transmission corridor near Walcha

7 | Assessment is deferred, and avoidance isn't secured on the ground

- **Deferred past the public.** Remaining survey "would be conducted in unsurveyed portions of the project area **before and/or after** project approval" (TR3 p. 485). The assessment will be updated "should further access be available" (TR3 p. 402). Results go into a Submissions Report addendum, which isn't exhibited, or into a post-approval management plan (HHMP).
- **New finds go straight to mitigation.** Under TR3 Section 12.4.1, newly found heritage "at risk of project impact" is assigned "mitigation". Only items "not at risk" get "avoidance and/or conservation" (TR3 p. 485). This contradicts the claim that avoidance is "the preferred option". Management measures only "may" apply to items found later (TR3 p. 473).
- **"Detailed design" is never described.** The EIS leaves the "full extent of potential impacts" on seven areas of archaeological potential to detailed design (EIS p. 375). It never explains when that happens, who does it, what siting criteria apply, how heritage is weighted against cost, or who reviews the result.
- **The HHMP has no approver or standards.** Measure HH1 (EIS p. 377) says the HHMP will be prepared "in consultation with" Heritage NSW and "approved" before construction, without saying who approves it. It is a list of headings with no performance outcomes. It is also to contain "predefined" measures by site type "to aid project delivery" (TR3 p. 479).
- **Commitments on paper have failed before.** On EnergyCo's Central-West Orana REZ transmission project, an Aboriginal rock shelter that was recorded in the project's planning documents and covered by a cultural management plan was destroyed during clearing by the network operator, ACEREZ (ABC News, 27 May 2026). Two investigations are under way. If a known, mapped and managed site can be lost, unfenced no-impact areas and an unexhibited management plan can't be relied on here.

What we ask the Department

Before determination:

1. Complete the survey. Require historical heritage survey of the whole project area, led by historical heritage specialists and including interviews with local historical societies and Councils.
2. Exhibit the results. Publish an updated assessment for public comment, not only in the Submissions Report, together with a map showing which land was physically surveyed.
3. Show the land access record. Require a log of heritage survey access requests (date, method, outcome) before accepting land access as a reason for incomplete assessment.
4. Assess the cultural/natural heritage landscape properly. Require a cultural/natural heritage landscape assessment.

Key questions to be answered

1. Which parts of the current project area were physically surveyed for historical heritage, and when? Does the "46%" figure include survey of earlier route options?
2. For each property in the project area, was access for heritage survey requested? When and how, and was it granted, refused, unanswered or never sought?
3. How many landholders were consulted about historical heritage, by local government area (LGA), and how many on the Walcha section? Why were local historical societies and Walcha Shire Council not consulted?

4. Why does Walcha Road Railway Station and yard group (State Heritage Register) have no impact assessment, given Camp 4 and the Central South Hub are at Walcha Road?
5. Why were the pastoral plans in Figures 6.32, 6.40, 6.42 and 6.45 cropped to exclude the project area? Do any recorded huts or outstations fall in or near the corridor?
6. How can the assessment be a "worst-case scenario" (TR3 p. 35) when about 54% of the project area wasn't surveyed?
7. Will EnergyCo commit that new finds in the footprint are considered for avoidance before mitigation (TR3 p. 485)?
8. Which no-impact areas will be fenced, and which will rely only on "a commitment to avoid, as documented through mapping" (TR3 p. 480)? After what happened on the CWO REZ, what will stop a recorded site being destroyed here?
9. What is the "detailed design process": when does it happen, who carries it out, what siting criteria apply, and who reviews the final footprint?
10. Who approves the HHMP? Will a draft be released for comment?
11. Why were photomontages prepared only from public locations? Will visual impacts be reassessed from inside homesteads and historic properties, including unlisted ones within 2 km?
12. Where are Workforce Camps 3 and 4, and how do they affect Barry Station and Walcha Road Station?
13. Field survey ran from August 2024 to March 2026 (EIS p. 363), but the current route wasn't settled until the October 2025 refinements. Which route or corridor was being surveyed between August 2024 and October 2025? Provide a map of each survey stage against the corridor in use at the time and the current project area. How much survey of the **current** route was done between October 2025 and the 13 March 2026 cut-off?
14. TR3 says "Umwelt field representatives consulted with landholders regarding the historical values associated with their properties", and that EnergyCo's own landholder consultation identified "additional information" (TR3 p. 30). How many landholders did Umwelt consult, and how many did EnergyCo? On which properties, in which LGAs, and how many on the Walcha section? Please release the field notes of those discussions, and the information EnergyCo passed to Umwelt.
15. How many responses did the April–July 2025 SIA survey receive? Which corridor were respondents shown, given the route changed in October 2025? Of the 90 responses to the 2026 survey, how many came from the Walcha district? What did the responses about "the natural landscape character of the project area" (TR3 p. 31) say, and how were they addressed?
16.

Conclusion

The historical heritage assessment does not give the Department, or the community, a reliable picture of what this project would affect. Most of the project area was not surveyed, the people who know the land were not asked, and the gaps are filled by desktop assumptions that the assessment's own results contradict. The Walcha district, one of the earliest settled parts of the New England Tablelands, is barely examined. What remains is deferred to processes the public will never see. The natural heritage landscape is not assessed, this is a living cultural heritage that should not be lost when there are other options to reach Net Zero goals.

We ask the Department not to determine the project until the assessment is completed and exhibited.

APPENDIX 1

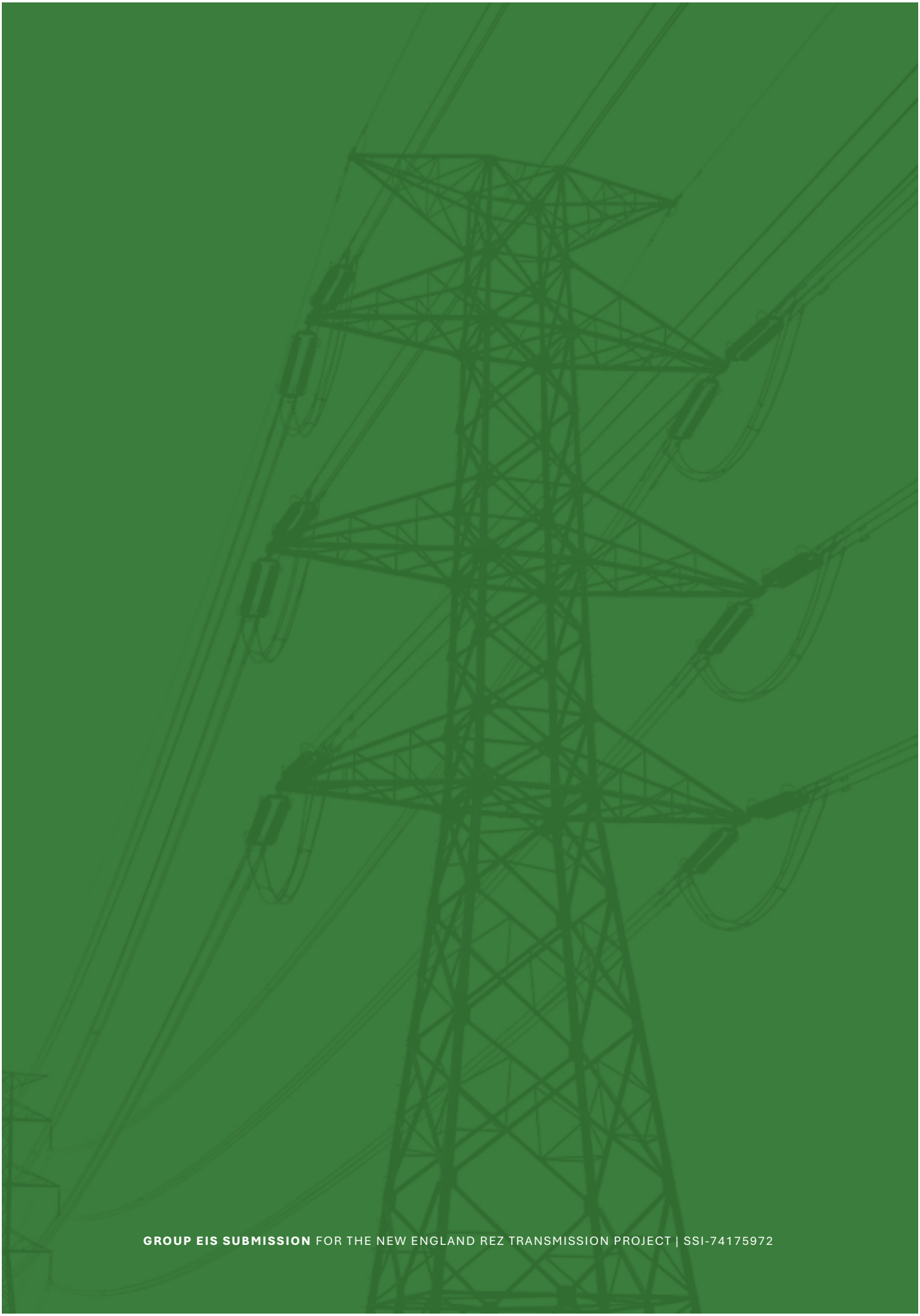
Deferred Detail Evidence Register

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

APPENDIX **1**

Deferred Detail Evidence Register

This Appendix provides evidence of the **abundance of project details left for later decisions** – occurring post determination

Our community needs essential project details before approval

We object to a process that asks our community to comment before important choices determining local impacts have been settled. The EIS must be sufficiently complete at public exhibition for residents to understand and test those impacts. Seeking approval while essential locations, investigations, designs and protective arrangements remain unfinished places an unreasonable burden on the people who will live with the consequences. A promise that a future operator or contractor will resolve those matters does not supply the information missing from public exhibition.

The exhibited documents expressly contemplate design changes after determination, allow some unfinished investigations to pass into the period after approval, and leave detailed traffic arrangements to a later delivery phase. The construction and operational environmental management plans are described as internal management documents. These are documented features of the proposed process. [E007, E321, E341, E388, E236, E239]

Our concern is that approval could be granted before the community can see and challenge material local consequences. Residents may then have to pursue individual problems through later design discussions, plan approvals and complaints processes. The documents must show who remains accountable, who can require a contractor to change its work, and how an affected neighbour can obtain an enforceable resolution.

Our request is that essential design and assessment information be completed, disclosed and open to meaningful public comment before determination. Any detail properly left to implementation must sit within clear assessed limits, with a named accountable party and a public process for resolving problems.

The register identifies 35 passages with express post approval wording and 27 more linked to an expressly post approval plan or framework. These 62 references sit within 593 substantive entries about unfinished or later decisions. They are source references, not 593 separate projects or 593 proven post approval deferrals. Section 6 explains the count.

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Scope of this report

This report concerns the October 2026 exhibited Environmental Impact Statement for the New England REZ Network Infrastructure Project, SSI 74175972. It does not treat every generation development within the wider renewable energy zone as part of this application. Determination means the decision on this project application. A later management plan approval or design consistency review is a different step.

The evidence describes the exhibited proposal. Statements about risks to our community are the conclusions we draw from that evidence; requests for stronger disclosure and accountability are the protections we seek.

1 | This EIS is not ready for public exhibition

The purpose of an EIS exhibition is simple: put the project on the table so the public can understand what is proposed, what it will do to them and their landscape, and whether the promised safeguards are credible. This EIS does not do that. Too many important parts of the project are still moving. We are being asked to comment on a project that EnergyCo itself has not yet finished defining.

No-one expects every bolt, footing or construction sequence to be finalised before an EIS is exhibited. But there is a very large difference between normal detailed engineering and not yet knowing matters that drive the impacts: where water will come from, whether that supply is actually available, where camps and ancillary sites will sit, how roads and intersections will be altered, which haulage routes will be used, how access will work, what the final disturbance footprint will be, and what safeguards will apply at the places actually affected. If those choices can change the impact, they are not minor detail. They are part of the project the public is supposed to be assessing.

The SEARs require a full description of the project, with suitable maps and plans, including its physical layout, and require specific information about matters such as water supply and wastewater. That is important because an EIS is not meant to ask the community to trust that the difficult questions will be worked out later. It is meant to give the community enough information to test those questions before the approval decision is made.

Issued Amended SEARs, 7 April 2026, pp1–3; Appendix A, printed A-2, A-4 and A-8; PDF pp4, 6 and 10. [E005, E038, E206, E244]

This is the basic problem with the exhibited EIS. If the water source is not settled, we cannot properly assess extraction impacts, drought reliability or the truck movements needed to cart water. If the haulage route or road treatment is not settled, the people living on those roads cannot properly assess traffic, safety, noise or access. If a camp layout and lighting design are not settled, its neighbours cannot properly assess what they will see and live beside. The same problem repeats across flooding, heritage, biodiversity, farm access, noise, waste and emergency access. E038, E398, E399, E409, E136, E173

EnergyCo often answers this uncertainty by using a reference design, conservative assumptions or a promise of later management. Those tools have a place, but they are not a substitute for doing the homework. A worst-case assumption may estimate an impact; it does not prove that the eventual design is workable, that the necessary resource can be secured, or that the mitigation will actually work at the final location. The more fundamental the unresolved choice, the weaker the value of an impact assessment built around a placeholder.E003, E004, E173, E243

This is not only a community risk. It is a project risk. If EnergyCo has not established where critical water, access, road capacity, sites and other construction inputs will come from - and has not tested those choices against the real environmental and community constraints - then how can it know the project can actually be built as proposed? Approval should not become permission to discover later

whether the project is practical. The project should be sufficiently developed before exhibition to demonstrate that it is both assessable and constructible.

2 | This is not minor detail - major project decisions are being left until later

The evidence below is not a complaint that every final engineering drawing is missing. It shows something more serious: the EIS repeatedly says that decisions affecting the footprint, impacts, construction method and safeguards will be made later - in detailed design, through management plans, after contractors are appointed, and in some cases expressly after project approval. That means the project presented to the public is not the project that will finally be built.

Design changes are expressly contemplated after determination

Example;

> *"Following project determination, any changes developed during the detailed design stage would be assessed for consistency with the approved project"*

Main EIS §3.2.1, printed p74; PDF p109. Extract from the sentence reproduced in E007. [E007]

This is the central concern. The project can be approved on one level of detail and then materially shaped through a later 'consistency' process. The network operator is also given responsibility for final detailed design and further technical assessments and site investigations. Once the main approval exists, the community is no longer commenting on whether the project should be approved in that form; it is trying to influence how an approved project is implemented. That is a very different and much weaker position.E243, E254

Unfinished investigations can pass into plans completed after approval

Example;

> *"any commitments not achieved prior to project approval will be addressed post-approval under the provisions of an ACHMP."*

Technical Report 2 §12.3.1, printed p317; PDF p339. ACHMP means Aboriginal Cultural Heritage Management Plan. [E321]

This is not simply paperwork being finished later. The heritage documents expressly allow unfinished investigation and assessment work to cross the approval date. The same project-wide framework allows additional biodiversity and heritage investigations before or after approval. In plain terms, some of the information needed to understand what is there, what may be harmed and what protection is required may not exist when the project is approved.E341, E244, E245, E247 ,E248

Protection methods and thresholds are also left to later plans

The concern becomes even clearer where the later plan is not just recording an already-set decision, but is being used to make the decision. The Aboriginal heritage material leaves excavation methodology, salvage locations, significance thresholds and other protective choices to a management plan finalised after approval. Those are substantive decisions about what will be disturbed and how it will be protected. They should not disappear into a later implementation process simply because the project has reached the approval stage.

Technical Report 2 §§12.2.2, 12.2.4.2 and 12.2.5; printed pp310, 315 and 317; PDF pp332, 337 and 339. [E310, E319, E320]

Detailed waste plans are expressly promised after determination

Example;

> *"Following determination, detailed waste management plans will be developed for the construction and operational phases of the project."*

Appendix D, Table D.3, printed D-11; PDF p127. [E268]

Waste is another straightforward example. The EIS says the detailed waste plans will be developed after determination, while quantities, receiving facilities, capacity and licences are still being worked through. For a project of this scale, the public should not have to accept 'we will work it out later' for the basic question of where very large waste streams can actually go and whether the receiving system has capacity.E226, E227, E228

The detailed traffic plan waits for contractor arrangements

Example;

> *"A detailed Traffic and Transport Management Plan has not been prepared as part of this TTIA, as it is a delivery phase document developed once the construction methodology, staging and contractor arrangements are confirmed."*

Technical Report 7 §4.3.3, Table 4-2; printed p29; PDF p45. TTIA means Traffic and Transport Impact Assessment. [E388]

Traffic follows the same pattern. The detailed traffic plan is deliberately left until construction methodology, staging and contractor arrangements are known. Final oversize and overmass vehicle details, routes, frequencies and timing are then refined by later operators and contractors. Yet those very matters determine which communities, homes, school routes and local roads carry the burden. It is difficult to call the public exhibition meaningful when the final transport task is still being designed after the people affected have made their submissions. E398, E399

Internal management documents do not guarantee equivalent public scrutiny

The EIS also relies heavily on later construction and operational management plans. Those plans are important, but the EIS describes the overarching CEMP and OEMP as internal management documents. The problem is not that management plans exist; every major project needs them. The problem is using a later management plan to fill a gap that should have been resolved in the EIS. A management plan should explain how an assessed project will be built safely. It should not become the place where the project itself is finally worked out.

Main EIS §§25.2.2–25.4, printed pp820–823; PDF pp855–858. [E235, E236, E238, E239, E240]

The effect is to shift important decisions out of the public exhibition and into a later, less visible delivery process. By then the central approval is in place, contractors have commercial programs to meet, and the community's leverage is much smaller. That is exactly the process risk this Appendix is intended to expose.

3 | The unfinished work creates risk for the community - and for whether the project can actually be built

The missing detail is not abstract. It affects homes, farms, roads, water, landscape and the practical ability to construct the project. The examples below show why the present level of uncertainty matters. They also expose a second question that EnergyCo has not adequately answered: if key resources, sites and construction solutions have not yet been secured and tested, what is the basis for confidence that the project is constructible?

Water supplies and extraction impacts remain dependent on further work

Water is the clearest example. The EIS leaves the feasibility of water sources and preferred supply options to detailed design and construction planning. The groundwater report says future take sites have not been selected, the site-specific data needed for modelling has not been collected, reliable availability cannot yet be confirmed, and further water dealings would be needed to secure groundwater. That is not a minor construction detail. Water is a basic construction resource. If the source, reliability, impacts and legal access are not established, the community cannot assess the impact and EnergyCo cannot yet demonstrate that this part of the construction task is secure. E038, E206, E533, E535

Before approval, EnergyCo should be able to show where the water is expected to come from, how much is needed, what is genuinely available in dry conditions, what other users or environments may be affected, what agreements or entitlements are required, and what happens if the preferred source fails. Without that work, the risk is simply pushed forward: either the project competes for a constrained resource, turns to another source with different impacts, or changes its transport task later. None of those outcomes can be properly tested in the current exhibition. E217, E218, E536

Transport decisions determine which roads and residents bear the burden

The same issue applies to transport. Final OSOM vehicle specifications, routes, frequencies and schedules depend on later operator and contractor work. Some drawings still leave construction methods, temporary works, utilities, school crossing impacts and even construction traffic layouts to later design or survey. These are the details that determine where road works are needed, whether movements fit, who is inconvenienced and where safety risks fall. E397, E398, E399, E406, E409, E413

This is also a constructability issue. If the final loads, swept paths, utility conflicts, road treatments and access arrangements are not known, then neither the cost nor the practicality of the transport solution is fully known. The public should not be asked to accept the impacts of a transport solution that is still being designed, and the determining authority should not assume that the eventual solution will be straightforward merely because it has been deferred to a contractor.

Camp design and lighting affect neighbouring homes

The camp issue shows how this process can fail neighbours. The main EIS says the detailed assessment of Camp 3 and the Camp 1 Alternate will occur after exhibition. Camp and laydown layouts and lighting specifications also remain for later design. That means nearby residents are being asked to make their submission before they can see the actual arrangement that may determine noise, lighting, traffic, visual impact, drainage, bushfire risk and day-to-day amenity. E022, E023, E362, E366, E126, E173

This is not a theoretical concern for our community. We have watched the controversy around camp lighting on Merotherie Road in the Central-West Orana REZ. A problem that could have been designed out early becomes much harder to resolve once approval has been granted, the contract has been let and the contractor is working to an approved program. The neighbour is then arguing about mitigation after the

fundamental decisions have already been made. New England is setting up the same risk if camp layouts, lighting and other neighbour-facing details are not properly resolved and exposed before approval.

The EIS does contain lighting controls and conservative noise assumptions. That is useful, but it does not answer the real question: what will actually be built next to the affected home, and who has the power to change it if the final arrangement causes an avoidable impact? Nearby residents should be able to see the layout, lighting parameters, access, operating arrangements and relevant safeguards while the design can still be changed through the assessment process - not after the project has effectively become a construction job. E136, E173

Farm access and property protections need enforceable arrangements

The same pattern reaches directly onto farms. Property management plans will later deal with access, construction timing and location, grazing and cropping, fences, tracks, livestock and other property-specific arrangements. Consultation is welcome, but these matters are not trivial where a transmission project cuts through a working farm. If the final works create an unreasonable conflict, the landholder needs to know who can change the design - not simply who can receive a complaint. E151, E155, E156, E384

The danger is that approval changes the balance of power. Before determination, a serious unresolved impact can be a reason to alter the project or refuse that part of it. After determination, the conversation risks becoming one about how the contractor can make the approved project work. That is why the important property conflicts, access arrangements and protection requirements should be understood as far as reasonably possible before approval, with a clear escalation path for what genuinely cannot be settled earlier.

Later drainage and road design can affect flooding and access

Flooding and road access provide another example. The flood report says the impacts of public road upgrades were not specifically assessed and that further review is required once the road designs are developed. Yet road geometry, drainage and embankments can change flood behaviour and access. If those designs are material to neighbouring properties or emergency movement, the impacts should be understood before the works are locked in, not discovered through detailed design.

Technical Report 15 §8.2.7, printed pp98–99; PDF pp106–107. [E521, E209, E210, E211, E212, E213]

Other unfinished investigations can change local protections

The same concern runs through the rest of the register: heritage and biodiversity investigations, noise controls, bushfire access and emergency planning, contamination, waste and cumulative impacts. Some later work is normal and unavoidable. But this EIS uses 'later' far too often for matters that can change the impact or expose whether the project is practical. The test should be simple: if an unanswered question could materially change who is affected, how badly they are affected, what protection is required, or whether the project can be constructed as proposed, that question belongs in the assessment before approval - not in the contractor's in-tray afterwards. E245, E247, E248, E176, E180, E184, E188, E195, E220, E229, E232, E233, E545, E551

4 | Neighbours need clear responsibility and an effective remedy

The evidence identifies several parties with different later tasks. EnergyCo is to develop the detailed Water Supply Strategy. The network operator is to develop the final design and construction management arrangements. Transport operators and contractors are to refine haulage details, and a road drawing expressly assigns construction methods and temporary works to the contractor. The public needs a single clear account of how these responsibilities fit together. [E206, E254, E235, E238, E398, E399, E406]

The accountability concern is especially serious where a later plan or design is accepted after the principal project determination. A neighbour should not have to reconstruct a chain of contracts, management plans and approvals to establish who can fix a problem. Allocating a task to a contractor must not obscure who remains answerable for meeting the project's commitments and resolving the consequences.

There are promises of ongoing engagement and complaint handling. The Community and Stakeholder Engagement Plan is to include participation, feedback, enquiries, complaints and monitoring. The driver code is to address complaint resolution and disciplinary action. Property and camp arrangements also include contact or response mechanisms. These commitments must be tested for their practical effect, rather than treated as a sufficient answer merely because a contact channel exists. [X034, E169, E155, E357]

The cited commitments do not, by themselves, settle every step from a resident raising a concern to someone with authority requiring and verifying a remedy. Without a clear process, residents risk being passed between EnergyCo, the network operator, the contractor and approving bodies while the disputed activity continues.

This is an experience that is being lived by communities in the Central West Orana REZ. It is a realistic outcome of this process. It is a predictable and avoidable outcome, but it is not being designed to be avoided in this instance. We need to see evidence of a better process than has been executed in the Central West Orana REZ.

The accountability questions that must be answered

Responsibility	What our community must be able to identify
Accountable organisation	The entity answerable for each deferred matter, including when a contractor or subcontractor changes.
Authority over the decision	Who prepares the design, who accepts it, and who can require a change or refuse an unacceptable proposal.
Public record	The design or plan, relevant investigations, assessed limits, approval basis and reasons for accepting the choice.
Neighbour participation	When affected people receive the information, how long they have to respond, and how their objections are answered before the choice is final.
Dispute escalation	A route beyond the immediate contractor, clear response deadlines, access to independent review, and responsibility for its cost.
Protection during a dispute	The circumstances in which relevant work must pause or change, and the interim measures needed to protect people and property.
Enforcement and remedy	Who can compel corrective work, check that it is effective, and determine responsibility for damage or loss where applicable.

The response should identify the relevant condition, commitment, plan provision or other enforceable mechanism for each answer. A general assurance that a contractor will comply is insufficient where the disputed detail has yet to be settled.

Our community should not be left to resolve through individual complaints a material project question that should have been described, assessed and exposed to public comment in the EIS process. Later complaint handling can address an implementation problem. It cannot recreate the opportunity to influence the principal approval before it was given.

A lot is being asked of REZ communities, and the track record in the CWO REZ is well below expectation. It is a series of demonstrably unfair outcomes, and there is no evidence that effort is being made to correct that deficiency.

5 | What must be resolved before approval

We ask the assessment department and determining authority to require a public, evidence-linked response to these matters before determination. The response should identify what will be completed before the decision and justify every material item proposed for later resolution.

Complete and disclose the information needed to assess local consequences

Provide the critical sites, layouts, water sources and volumes, supply arrangements, routes, traffic limits, camp and lighting parameters, waste destinations, investigations and protective limits. If a final choice remains open, publish the permitted alternatives and demonstrate that the assessment covers their reasonably foreseeable effects. Essential assessment gaps should be resolved before approval is considered.

Publish a schedule of every material decision left unfinished

For each relevant evidence entry, state the decision still required, the missing information, who will prepare and approve it, the completion date and the public review process. Explain why it is suitable for later resolution. Where several entries concern the same decision, identify that connection without losing the source references.

Give the community a meaningful opportunity to respond to new information

Where a submissions or amendment report adds a camp assessment, changes a material site or route, or supplies an investigation central to an impact finding, make the information available with sufficient time for affected people to examine and respond before determination. Publish how those responses affect the proposal and the assessment.

Set firm limits for any detail properly left to implementation

Specify the permissible locations, quantities, hours, performance standards and protective measures. Identify the thresholds that require further assessment, public consultation, a change to the approval or rejection of a proposed option. Require a published explanation showing how each later material design remains within the assessed limits and approval conditions.

Keep responsibility clear through design and construction

Publish the accountability arrangements described in section 4. Identify the entity responsible for resolving a neighbour's issue throughout design, construction and operation. Require that responsibility to remain clear

through procurement and changes of contractor. Residents should receive one coordinated response, with access to escalation and an enforceable remedy.

Make later approvals and dispute outcomes visible

Publish the relevant later plans, material design changes, supporting investigations, approval decisions and compliance findings, with any necessary redactions explained. Identify when affected residents can comment before a later decision is accepted. Report complaints, corrective actions and unresolved matters in a form that protects personal information while allowing the community to see whether the process is working.

Prevent unresolved material risks from being carried into the works

Specify which relevant activities cannot start until investigations, protective arrangements or disputes about compliance have been resolved. Give the responsible decision maker clear authority and duties to require corrective action. The approval framework should prevent a resident's unresolved concern about a material impact from being overtaken by construction.

We object to granting approval on the assumption that future design, agreements and contractor plans will make the unanswered questions acceptable. The missing information must be supplied, or the project must be constrained by limits that the community can see and test. Public participation fails if the people exposed to the impacts are asked to respond before essential details are available and are then left to pursue the consequences after approval.

6 | Evidence counts and how to check each reference

The register contains 593 substantive source entries that highlight our concerns. The first two items below identify 62 references expressly connected to work that will be carried out after approval. The other items record later decisions or missing information.

What the passage establishes	Entries
Work expressly allowed after approval	35
Details assigned to a post approval plan or process	27
Details left for later design, delivery or operation	421
Information promised for a Submissions or Amendment Report	41
Unresolved details with no stated completion stage	69
Total substantive evidence entries	593

What each description means

Work expressly allowed after approval means the passage itself uses post approval or post determination wording. Some passages allow work before and after approval, or apply only if earlier work remains unfinished. The count does not imply that every activity described will inevitably be postponed.

Details assigned to a post approval plan or process means an explicit linked source supplies that timing. Each entry gives the additional timing reference. Most concern matters to be settled through the Aboriginal or historical heritage management plans; others link to the project's express post approval framework.

Details left for later design, delivery or operation includes detailed design, contractor appointments, preconstruction investigations, later management plans and operating decisions. The individual passage does not expressly fix completion against determination. It records the later dependency without assuming the approval date.

Information promised for a Submissions or Amendment Report identifies information absent from the exhibited version but proposed for that later assessment stage.

Unresolved details with no stated completion stage identifies an open location, quantity, assessment or arrangement without a definite completion stage. Neither description is automatically a post approval deferral.

How to verify a passage

Quotation marks identify source wording. Labelled paraphrases identify summaries. Commentary and community concerns are analysis. Printed page means the number on the source document; PDF page means the viewer page with the cover counted as page 1. The source list supplies official links. In the main EIS, the body's printed page number is 35 less than its PDF viewer page; other reports have different offsets.

The analysis covered 39 PDF files containing 16,606 pages: the main EIS, executive summary, combined appendices, 22 technical report bodies, nine supplements, assessment requirements, agency letters and a regional water update.

While there are a lot of pages, our observation and argument is that there is a lack of completeness and detail.

Direct links to references connected to work after approval

These links have been recorded for ease of reference.

Work expressly allowed after approval [E007, E018, E063, E092, E096, E100, E102, E104, E107, E117, E118, E120, E122, E244, E245, E247, E248, E268, E310, E312, E319, E320, E321, E322, E324, E328, E330, E334, E335, E337, E339, E340, E341, E358, E574]

Details assigned to a post approval plan or process [E091, E093, E094, E095, E097, E098, E099, E105, E113, E114, E115, E116, E243, E246, E313, E314, E315, E316, E317, E318, E325, E327, E331, E332, E333, E580, E581]

7 | Evidence of unfinished project decisions

Each entry states the unfinished detail and its timing in plain language, followed by the source and page references. Entries are arranged in source order. Evidence IDs provide stable references for submissions and responses. Use section 6 for the counting rules.

Main EIS | 2 | Strategic context

E001 Project area refinement after the EIS

Information promised for a Submissions or Amendment Report | EIS; 2.6 Route selection and project design options; printed p54; PDF p89

> *"The EIS project area will continue to be refined in response to ongoing engagement with landholders and other stakeholders, and submissions raised in the EIS."*

E002 Further impact avoidance through detailed design

Details left for later design, delivery or operation | EIS; 2.7 Impact avoidance and minimisation; printed p56; PDF p91

> *"Broader route selection decisions, particularly the move to the new study corridor in October 2025 (and now subsequently refined for the project area assessed in this EIS), have improved constructability, reduced steep terrain constraints and construction risks, lowered vehicle movements and environmental disturbance, and enhanced bushfire resilience and aviation safety outcomes. Overall, impact avoidance and minimisation have been a primary driver of the route selection and design refinement process, with ongoing opportunities for further avoidance and minimisation to be considered during detailed design."*

3 | Project Description

E003 Project elements remain at reference design

Details left for later design, delivery or operation | EIS; 3 Project description; printed p63; PDF p98

> *"As detailed in Section 2, considerable refinements have been made through the route selection and project design process in response to environmental and technical studies, and feedback from landholders, communities and other stakeholders. As the project is currently at the reference design stage, there will be elements of the project that are refined during the detailed design process."*

E004 Design refinement and further technical surveys

Details left for later design, delivery or operation | EIS; 3.1 Project overview; printed p64; PDF p99

> *"The project description is based on the reference design. The reference design is the initial project design detailing key components and technical parameters for the transmission lines, energy hubs, ancillary infrastructure and access tracks. The reference design will be further refined as the project progresses to the detailed design stage, based on continued landholder feedback, further technical and environmental surveys."*

E005 Final infrastructure siting and disturbance footprint

Details left for later design, delivery or operation | EIS; 3.2.1 Detailed design and assessment approach overview; printed p74; PDF p109

> *"The project area represents the area within which construction of the project would occur and is generally a 250 metre-wide corridor, with varying sizes at energy hubs and for ancillary infrastructure sites. The project area (refer to Figure 3.2) is a broader area that provides flexibility for the final siting of project infrastructure and the disturbance footprint and within which the final operational easements for the project would be located (generally 120 metres for dual 330 kV transmission lines, 70 metres for single 500 kV transmission lines and 140 metres for dual 500 kV transmission lines). Final siting of project infrastructure and the disturbance footprint within the project area would be confirmed during detailed design, subject to environmental management measures including the avoidance of defined no-impact areas."*

E005 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E006 Material changes through a later Amendment Report

Information promised for a Submissions or Amendment Report | EIS; 3.2.1 Detailed design and assessment approach overview; printed p74; PDF p109

> *"Following exhibition of this EIS, should any material changes to the project be identified or required in response to ongoing investigations, submissions on the EIS during the public exhibition phase or in response to landholder feedback, these would be documented and assessed in an Amendment Report and submitted at the same time as the Submissions Report."*

E007 Changes following determination

Work expressly allowed after approval | EIS; 3.2.1 Detailed design and assessment approach overview; printed p74; PDF p109

> *"Following project determination, any changes developed during the detailed design stage would be assessed for consistency with the approved project as per the process described in Section 6."*

E008 Final number location and types of towers

Details left for later design, delivery or operation | EIS; 3.2.3 Transmission lines and towers; printed p76; PDF p111

> *"The number, location and type(s) of towers required would be confirmed as part of detailed design. However, a disturbance footprint based on the reference design, including the indicative location of towers, has been used as relevant for the assessment in this EIS. The indicative types of transmission towers and easement widths proposed for the 500 kV and 330 kV network infrastructure and assessed in this EIS is provided on Figure 3.3."*

E008 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E009 Tower specifications and arrangement

Details left for later design, delivery or operation | EIS; 3.2.3 Transmission lines and towers; printed p76; PDF p111

> *"The 500 kV or 330 kV transmission lines would be supported on a series of transmission line towers. The final location and specification of each transmission tower would be dependent on a range of factors such as distance between each structure, structure loading, transmission line voltage, changes in direction of the transmission line route, local geotechnical conditions, topography and local environmental constraints (such as the need to avoid specific areas of biodiversity value or to span watercourses). The type and arrangement of the transmission towers would continue to be refined as part of the finalisation of the project design."*

E010 Tower base footprints and foundations

Details left for later design, delivery or operation | EIS; 3.2.3 Transmission lines and towers; printed p77; PDF p112

> *"Figure 3.4 provides an indicative diagram of transmission line tower components. The final base footprint and required foundation types for the 500 kV and 330 kV towers would be confirmed as part of the detailed design process."*

E011 Number and configuration of hub components

Details left for later design, delivery or operation | EIS; 3.2.4 Energy hubs; printed p78; PDF p113

> *"Details of the energy hubs are presented in Table 3.2 and shown on Figure 3.2. Indicative layouts of the energy hubs are shown on Figure 3.5 to Figure 3.9. The final number and configuration of hub components would be confirmed during the detailed design phase."*

E012 Auxiliary power connections and transmission routes

Details left for later design, delivery or operation | EIS; 3.2.4.3 Auxiliary power; printed p83; PDF p118

> *"Detailed assessment of connection points and transmission routes would be undertaken, where possible, following exhibition of the EIS and incorporated in the Amendment Report for the project, subject to detailed studies undertaken in consultation with the relevant local network operator. Where further ongoing detailed studies are required in consultation with the relevant local network operator post submission of the Amendment Report and during detailed design, additional environmental assessment would be undertaken. The proposed work would also be assessed to confirm they are consistent with the approved project."*

E012 note: Mixed pathway: Amendment Report assessment is intended where possible; further detailed studies and an approved-project consistency check are also contemplated.

E013 Bayswater substation final configuration

Details left for later design, delivery or operation | EIS; 3.2.5 Bayswater Power Station substation extension; printed p90; PDF p125

> *"Work is required at Transgrid's existing Bayswater Power Station 500/330 kV substation to connect the project to the NEM. An indicative layout of the substation extension is shown on Figure 3.10. The final configuration would be confirmed during the detailed design phase."*

E014 Retention or removal of access tracks

Details left for later design, delivery or operation | EIS; 3.2.7.1 Permanent site access, road and intersection treatments; printed p94; PDF p129

> *"It is proposed that some of the access tracks established during the construction phase to facilitate the movement of vehicles plant, equipment and materials would be retained for the operational and maintenance phase. The requirements to retain or remove access tracks would be determined in consultation with landholders during property access negotiations and ahead of the commencement of operation of the project."*

E015 Temporary Central B communications arrangement

Details left for later design, delivery or operation | EIS; Microwave links; printed p95; PDF p130

> *"• Central B Hub: a temporary arrangement may be required between project stages to ensure redundancy requirements are met. This would be confirmed during detailed design"*

E016 Required utility adjustments

Details left for later design, delivery or operation | EIS; 3.2.8 Utility adjustments and crossings; printed p96; PDF p131

> *"Consultation with all relevant utility providers has been carried out throughout the development of the reference design for the project. This has included presentations to utility providers and councils on potential impacts to electricity infrastructure, telecommunications lines and water lines, including any proposed relocations of utilities to minimise potential impacts. Further consultation would be undertaken with utility providers and councils to inform detailed design and confirm the required utility adjustments for the project."*

E017 Utility works outside the assessed project area

Details left for later design, delivery or operation | EIS; 3.2.8 Utility adjustments and crossings; printed p96; PDF p131

> *"Appendix C and Figure 3.11 provide an overview of the utility adjustments required for the project. Those located within the project area have been assessed as part of this EIS. Some connection works, or any proposed utility protection or relocation works may be required outside the project area. As required, further assessment of these works would be undertaken, where possible, following exhibition of the EIS and incorporated as part of an Amendment Report for the project (subject to detailed studies undertaken in consultation with the relevant utility providers and councils). Where further ongoing detailed studies are required in consultation with the relevant utility providers and councils post submission of the Amendment Report and during detailed design, additional environmental assessment would be undertaken. The proposed work would also be assessed to confirm they are consistent with the approved project."*

E017 note: Mixed pathway: Amendment Report assessment is intended where possible; further detailed studies and an approved-project consistency check are also contemplated.

E018 Enabling works shortly after determination

Work expressly allowed after approval | EIS; 3.3.1 Construction overview; printed p104; PDF p139

> *"It is proposed that pre-construction minor work and enabling work would occur prior to the approval of management plans required by the project approval (refer to Section 3.3.4). This is proposed to allow the timely commencement of construction by progressing enabling work shortly after project determination. Appropriate management and mitigation measures as outlined in this EIS would be implemented for these activities."*

E018 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E019 Construction program and contractor consultation

Details left for later design, delivery or operation | EIS; 3.3.2 Construction program; printed p105; PDF p140

> *"An indicative construction program and staging is shown on Figure 3.12. The construction program would continue to be refined during detailed design and in consultation with construction contractors."*

E020 Dates and durations of out of hours work

Details left for later design, delivery or operation | EIS; 3.3.3.2 Out-of-hours work; printed p107; PDF p142

> *"During detailed design and further construction planning, a program would be determined to identify the required out of hours work periods (including dates and durations)."*

E021 Final construction workforce estimate

Details left for later design, delivery or operation | EIS; 3.3.3.3 Construction workforce; printed p108; PDF p143

> *"EnergyCo has estimated the construction workforce based on the current reference design, indicative project schedule and contemporary project examples. This estimate would be finalised as the detailed design process progresses."*

E022 Camp 3 full assessment

Information promised for a Submissions or Amendment Report | EIS; 3.3.5 Workforce accommodation camps; printed p111; PDF p146

> *"The location of Camp 3 has only recently been identified for the project, despite ongoing investigations over an extended period. In May 2026, a potential option for this camp was identified in the Barry locality. EnergyCo has commenced discussions with the landholder on the investigation and potential acquisition of this property for use as an accommodation camp. The camp location was identified after completion of the majority of technical studies prepared for the EIS, therefore has not been assessed in detail as part of this EIS. Detailed assessment of the proposed location for Camp 3 will be undertaken following exhibition of the EIS and included in an Amendment Report."*

E023 Camp 1 Alternate full assessment

Information promised for a Submissions or Amendment Report | EIS; 3.3.5 Workforce accommodation camps; printed p111; PDF p146

> *"Through ongoing engagement with Muswellbrook Shire Council, a possible alternative location for Camp 1 has been identified (Camp 1 Alternate). EnergyCo is currently investigating the site in consultation with Council. Detailed assessment of the proposed alternate location for Camp 1 will also be undertaken following exhibition of the EIS and included in an Amendment Report."*

E024 Final OSOM vehicle configurations and schedules

Details left for later design, delivery or operation | EIS; 3.3.6.2 Over size and over mass haulage routes; printed p115; PDF p150

> *"Most high risk OSOM deliveries are expected to originate from the Port of Newcastle (including from the Newcastle Logistics Precinct which is intended to be used for deliveries associated with construction of the project) and travel to the energy hubs and the Bayswater Power Station substation extension site via the New England Highway. High risk OSOM deliveries are those that exceed certain vehicle dimensions, mass or route characteristics as defined by TfNSW and therefore require specific management measures. Final OSOM vehicle configurations and delivery schedules would be confirmed through the relevant regulatory approval processes, undertaken in consultation with TfNSW, the National Heavy Vehicle Regulator and the applicable local councils. The indicative total high risk OSOM vehicle movements for the duration of the project are listed in Table 3.8."*

E025 Final OSOM movement numbers

Details left for later design, delivery or operation | EIS; 3.3.6.2 Over size and over mass haulage routes; printed p115; PDF p150

> *"Based on the current scope, in the order of around 53 high risk OSOM movements are anticipated in total. This estimate is based on the assumed equipment configuration at the time of this assessment. The final number of OSOM movements may vary depending on detailed material selection, equipment specifications and transport logistics confirmed during later stages of design and procurement."*

E026 Final public road treatment designs

Details left for later design, delivery or operation | EIS; 3.3.6.3 Road and intersection treatments; printed p116; PDF p151

> *"The final design of treatments to the existing public road network would be confirmed in consultation with the relevant road authorities and would also be informed by detailed OSOM vehicle selection and consultation with TfNSW and the National Heavy Vehicle Regulator (NHVR)."*

E027 Access track disturbance footprint

Details left for later design, delivery or operation | EIS; 3.3.8 Access track construction; printed p125; PDF p160

> *"A disturbance footprint based on the reference design, including access tracks, has been used as relevant for the assessment in this EIS. The final disturbance footprint associated with access tracks would be confirmed during detailed design. Key factors influencing the extent of disturbance associated with access tracks include terrain and slope, landholder consultation, geotechnical conditions, drainage requirements and constructability considerations. In steeper or more constrained areas, additional disturbance would typically be required to accommodate safe access, including wider track formations, cut and fill batters and localised realignments."*

E027 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E028 Retention or removal of construction tracks

Details left for later design, delivery or operation | EIS; 3.3.8 Access track construction; printed p125; PDF p160

> *"Individual land use needs have been considered in the design of access tracks to enable the landholder's continued use of the land, as well as to minimise the overall environmental impacts. The requirements to retain or remove access tracks would be determined in consultation with landholders during property access negotiations and ahead of the commencement of operation of the project."*

E029 Final access layout and consistency assessments

Details left for later design, delivery or operation | EIS; 3.3.8 Access track construction; printed p125; PDF p160

> *"Further consultation with landholders would be undertaken during detailed design to ensure access arrangements are responsive to existing land use needs and property operations. As a result, the final access track layout may change from that assessed in this EIS and where required these changes would be considered via a consistency assessment."*

E030 Extent of existing and new access track works

Details left for later design, delivery or operation | EIS; 3.3.8 Access track construction; printed p125; PDF p160

> *"Table 3.9 further describes the access track requirements for the construction of the project which are also shown on Figure 3.14. The full extent of work for the upgrade of existing access tracks and the construction of new access tracks would be confirmed as part of detailed design."*

E031 Individual waterway crossing designs

Details left for later design, delivery or operation | EIS; 3.3.8.1 Waterway crossings; printed p127; PDF p162

> *"All waterway crossings would be designed on a case by case basis during detailed design, taking into account hydrology, geomorphology, ecological values and construction requirements. Appropriate controls would be implemented to minimise impacts to waterway banks and beds, manage erosion and sediment risks, and avoid adverse impacts to downstream flows and water quality."*

E032 Final vegetation clearing footprint

Details left for later design, delivery or operation | EIS; 3.3.9 Vegetation clearing; printed p128; PDF p163

> *"The disturbance footprint represents an indicative clearing envelope developed from the reference design to inform impact assessment and establish clearing limits. The project components and their clearing requirements which have been included in the disturbance footprint are provided in Table 3.10. This approach, as illustrated on Figure 3.17, identifies the quantum of clearing required for the project and provides a basis for assessing potential impacts, whilst recognising that the specific locations of vegetation clearing may change during detailed design as the alignment, access arrangements and infrastructure layout are refined. The final clearing footprint would therefore be confirmed during detailed design and construction planning but would be managed so that remains within the assessed clearing limit that would be expected to be formalised as part of the project approval."*

E032 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E033 Tower pads and site specific foundations

Details left for later design, delivery or operation | EIS; 3.3.10.1 Establishment of tower foundations; printed p134; PDF p169

> *"The tower pads would be site specific and optimised during detailed design. While the optimum approach would be a large flat site, given the project terrain, many sites would require terracing, with 2 or more flat benches to create safe useable areas to work from. Tower foundations would be constructed based on site-specific geotechnical conditions (to be assessed as relevant for each location to inform the construction approach) and the type of tower structure. Construction of foundations would involve excavation or drilling, placement of reinforcement and delivery and placement of concrete."*

E034 Whether blasting is required

Details left for later design, delivery or operation | EIS; 3.3.10.1 Establishment of tower foundations; printed p134; PDF p169

> *"Where rock is encountered at or near the surface and cannot be excavated using conventional mechanical methods, controlled blasting may be required to facilitate foundation construction. The need for blasting would be determined during detailed design following geotechnical investigation."*

E035 Hub roads drainage and infrastructure layouts

Details left for later design, delivery or operation | EIS; 3.3.11 Energy hubs; printed p136; PDF p171

> *"The layout of roads, drainage and infrastructure within each hub would be confirmed during detailed design, taking into account topography, drainage requirements and site-specific constraints."*

E036 Materials processing site locations and layouts

Details left for later design, delivery or operation | EIS; 3.3.12.1 Crushing and grinding and screening plant; printed p137; PDF p172

> *"The location and layout of these sites would be determined in accordance with the ancillary facilities location protocol as provided below in Section 3.3.12.2, which applies a risk-based approach to avoid or minimise impacts on sensitive receivers, environmental values and existing land uses."*

E037 Final ancillary site locations in the CEMP

Details left for later design, delivery or operation | EIS; 3.3.12.2 Location assessment protocol; printed p137; PDF p172

> *"The application of this protocol enables the identification of suitable ancillary site locations within the project area, while allowing refinement during detailed design. The final locations would be confirmed during detailed design and documented in the CEMP."*

E038 Feasibility of water sources and preferred supplies

Details left for later design, delivery or operation | EIS; 3.3.13.1 Water requirements and supply; printed p139; PDF p174

> *"A combination of these water sources would be required to meet the total potable and non-potable water demand for the project. Further investigation into the feasibility of each of the water sources and preferred options would be undertaken during detailed design and construction planning, in consultation with commercial suppliers and local councils."*

E039 Final operational workforce estimate

Details left for later design, delivery or operation | EIS; 3.4.4 Operational workforce; printed p143; PDF p178

> *"EnergyCo has estimated the operational workforce based on the current reference design and contemporary project examples. This estimate would be finalised as the detailed design process progresses."*

4 | Statutory context

E040 Final approvals depend on unfinished design

Unresolved details with no stated completion stage | EIS; 4.3 Statutory requirements; printed p149; PDF p184

> *"The project is likely to require several other approvals to meet NSW legislative requirements. The final approval requirements will be dependent on the final design, consultation and construction methodology outcomes which are not currently finalised. Potential approval requirements are identified below with details of how these have been considered for the project provided in Appendix D:"*

6 | Assessment approach

E041 Final disturbance footprint

Details left for later design, delivery or operation | EIS; 6.4 Disturbance footprint; printed p212; PDF p247

> *"The disturbance footprint sits within the project area and is an estimation of the likely magnitude of the area that would be directly impacted by the construction of the project, including but not limited to transmission towers and easement clearing, the energy hubs, workforce accommodation camps and laydown areas, access tracks, public road works and ancillary sites and infrastructure. The disturbance footprint has been used to inform the impact assessment in this EIS and will be finalised as part of the detailed design and project implementation process."*

E041 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E042 Reference design and further surveys

Details left for later design, delivery or operation | EIS; 6.7 Reference design; printed p214; PDF p249

> *"This EIS is based on the project's reference design. The reference design is the initial project design detailing key components and technical parameters for the transmission lines, energy hubs and ancillary infrastructure and access tracks that is described in Section 3 of this EIS. The reference design has been used to determine the disturbance footprint, operational area and operational footprint, inform the project area and provide a basis for the environmental assessment of the project. The reference design will be further refined based on continued landholder feedback, further technical and environmental surveys and as the project progresses to the detailed design stage."*

E042 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E043 Flexibility for final tower placement

Details left for later design, delivery or operation | EIS; 6.7 Reference design; printed p214; PDF p249

> *"A corridor approach to the transmission line alignment, based on the reference design, has been adopted to define the project area and thereby allow flexibility for tower placement during detailed design. Indicative tower locations based on the reference design have been used by relevant technical assessments as required, notably in the landscape and visual assessment to enable more detailed analysis."*

E043 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E044 Survey completion depends on land access

Unresolved details with no stated completion stage | EIS; 6.8 Inaccessible area assessments; printed p215; PDF p250

> *"Further field surveys are planned for the parts of the project area where land access is not currently available as access becomes available. Where additional field surveys are able to be undertaken prior to approval, this information will be presented in the Submissions Report to be prepared following exhibition of the EIS."*

E044 note: Completion before approval is intended or conditional on access and timing; this passage alone does not guarantee completion before determination.

E045 Sensitive receiver verification and later assessment

Information promised for a Submissions or Amendment Report | EIS; 6.9 Sensitive receivers; printed p215; PDF p250

> *"Given the scale of the project and limited access to some properties, it is possible that some locations identified in the EIS as dwellings may be other structures (for example sheds), and vice versa. As further information becomes available, the relevant assessments will accordingly be refined within the Submissions Report and Amendment Report as relevant. This includes consideration of a recently identified sensitive receiver within the project area south of Nundle State Forest (previously thought to be a shed), which was identified during recent engagement with the landholder. This sensitive receiver will be assessed within the Submissions Report / Amendment Report."*

E046 Camp 3 detailed assessment

Information promised for a Submissions or Amendment Report | EIS; 6.10 Recently identified ancillary sites; printed p216; PDF p251

> *"Detailed assessment of the proposed location for Camp 3 will be undertaken following exhibition of the EIS and included in the Submissions Report and Amendment Report, as relevant."*

E047 Camp 1 Alternate detailed assessment

Information promised for a Submissions or Amendment Report | EIS; 6.10 Recently identified ancillary sites; printed p216; PDF p251

> *"Detailed assessment of the proposed location for Camp 1 Alternate will be undertaken following exhibition of the EIS and included in the Submissions Report and Amendment Report, as relevant."*

7 | Biodiversity

E048 Camp surveys for threatened species habitat

Information promised for a Submissions or Amendment Report | EIS; 7.2.8 Biodiversity of recently identified ancillary sites; printed p248; PDF p283

> *"• the presence of disturbed grassland communities where many habitat features were absent, these areas would require further survey and assessment to document potential threatened species habitat"*

E048 note: Submissions and Amendment Report timing is supplied by the adjoining discussion on printed p249, PDF284.

E049 Camp surveys for threatened flora habitat

Information promised for a Submissions or Amendment Report | EIS; 7.2.8 Biodiversity of recently identified ancillary sites; printed p248; PDF p283

> *"• potential habitat for some locally recorded threatened flora species that would require further survey and assessment."*

E049 note: Submissions and Amendment Report timing is supplied by the adjoining discussion on printed p249, PDF284.

E050 Camp biodiversity assessment in revised BDAR

Information promised for a Submissions or Amendment Report | EIS; 7.2.8 Biodiversity of recently identified ancillary sites; printed p249; PDF p284

> *"Both of these locations would be subject to full assessment in the revised BDAR as part of the Submissions Report and Amendment Report, including biodiversity survey."*

E051 Final siting to avoid biodiversity impacts

Details left for later design, delivery or operation | EIS; 7.3 Avoidance; printed p250; PDF p285

> *"• detailed design and final siting of permanent and temporary project infrastructure to avoid and minimise impacts on TECs, threatened species habitat, rocky habitat features, watercourses and other identified biodiversity constraints where practicable."*

E052 Further surveys design refinement and micrositing

Details left for later design, delivery or operation | EIS; 7.3 Avoidance; printed p250; PDF p285

> *"Refinement of the reference design will continue following the exhibition of the EIS. This will aim to further avoid and minimise impacts on biodiversity as refinements are made and/or biodiversity surveys within the subject land identify new biodiversity values that warrant avoidance. Detailed design and micro siting will continue to consider how permanent and temporary project infrastructure is built and where it is located, to avoid and minimise impacts on biodiversity."*

E053 Unsurveyed threatened flora assumptions

Unresolved details with no stated completion stage | EIS; 7.4.1.3 Candidate threatened flora; printed p257; PDF p292

> *"Given the large number of species that have been assumed present, it is expected that with further survey in currently inaccessible areas the extent of predicted impact on threatened flora species would be reduced. It is noted that many of the threatened flora species assumed present in inaccessible areas were not found during the extensive targeted flora surveys undertaken in the accessible areas."*

E053 note: Assumed presence and conservative assessment are used for inaccessible areas; later surveys may reduce the predicted impact.

E054 Unsurveyed threatened fauna assumptions

Unresolved details with no stated completion stage | EIS; 7.4.1.4 Candidate threatened fauna; printed p262; PDF p297

> *"18 species listed under the BC Act only including one endangered fauna population. For the 12 species that have been assumed present, it is expected that with further survey in currently inaccessible areas the extent of predicted impact on threatened fauna species would be reduced. It is noted that some of the threatened fauna species assumed present in inaccessible areas were not found during the targeted surveys undertaken in the accessible areas."*

E054 note: Assumed presence and conservative assessment are used for inaccessible areas; later surveys may reduce the predicted impact.

E055 Further surveys of serious and irreversible impacts

Unresolved details with no stated completion stage | EIS; 7.4.1.5 Serious and irreversible impacts; printed p267; PDF p302

> *"Fifteen SAII entities are known or assumed to occur in the disturbance footprint based on the presence of suitable habitat (refer to Table 7.9). Two TECs, one threatened flora species and one threatened fauna species are known to occur. Four threatened flora species, one threatened fauna population and 6 threatened fauna species are assumed to occur. It is expected that with further survey in inaccessible areas, the number and extent of predicted SAII impacts is likely to reduce ."*

E055 note: Assumed presence and conservative assessment are used for inaccessible areas; later surveys may reduce the predicted impact.

E056 Further mitigation for serious and irreversible impacts

Details left for later design, delivery or operation | EIS; 7.4.1.5 Serious and irreversible impacts; printed p269; PDF p304

> *"Avoidance and mitigation of impacts to potential SAII entities will be further prioritised during refinement of the reference design and detailed design. Mitigation measures to be further prioritised include but are not limited to micro-siting of the transmission line infrastructure and associated work sites to avoid and minimise direct impacts where practicable, retention of habitat features, establishment of 'habitat connectivity corridors', and specific clearing controls in sensitive biodiversity areas (refer to Section 7.7)."*

E057 Karst geotechnical investigations and vibration assessment

Details left for later design, delivery or operation | EIS; 7.4.3.1 Karst, caves, crevices, cliffs and other geological features of significance, or rocks; printed p274; PDF p309

> *"To avoid and minimise the risk of impact on karst systems, detailed design and construction planning would incorporate site-specific geotechnical investigations and vibration assessments. Construction methods and equipment selection would be managed to ensure compliance with vibration criteria and to avoid adverse vibration impacts."*

E058 Final habitat connectivity corridor locations

Details left for later design, delivery or operation | EIS; 7.4.3.3 Habitat connectivity; printed p275; PDF p310

> *"Despite these impacts, the project would remain permeable to fauna movement and would not act as a complete barrier. Retention of vegetation and groundcover within the easement, together with identified habitat connectivity corridors (indicative locations to be confirmed during detailed design), particularly along riparian zones, would maintain movement pathways across the landscape. Retention of groundcover and low-growing native vegetation within the easement would continue to provide opportunities for movement and refuge for many fauna species."*

E059 Connectivity Strategy and artificial structures

Details left for later design, delivery or operation | EIS; 7.4.3.3 Habitat connectivity; printed p275; PDF p310

> *"While the maintenance of vegetation at reduced heights may reduce the availability of shade, shelter and other microhabitat features for reptiles and amphibians, these species would generally remain capable of traversing the easement, and impacts to habitat connectivity are therefore expected to be limited. Additional targeted measures would be implemented to further support connectivity. A Connectivity Strategy would be developed in consultation with CPHR to confirm the location and design of connectivity features, including retained vegetation corridors and the provision of artificial structures (for example rope bridges, koala refuge poles) where new barriers to habitat connectivity are created. The strategy would incorporate monitoring to assess effectiveness, with adaptive management applied where required."*

E060 BMP performance measures triggers and procedures

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p278–279; PDF p313–314

> *"The Biodiversity Management Plan (BMP) will be prepared by a suitably qualified ecologist in consultation with relevant government agencies (including CPHR) and implemented for the duration of construction. The BMP will: • describe biodiversity values within the project area and the controls for direct, indirect, prescribed and uncertain impacts • be framed around SMART objectives and include quantitative performance measures, triggers, corrective actions and an adaptive management plan that consolidates and references the sub plans and Biodiversity Impact Monitoring Program (B20) listed in this table … • include Sensitive Area Maps requirements, showing areas to be protected, including exclusion/no-go zones, rocky habitats, riparian areas, turtle nesting locations, karst, habitat connectivity corridors to be retained and protected habitat features adjoining work areas … • specify minimum requirements for the following sub-plans: vegetation clearing (B2), fauna management (B10); supplementary hollow and nest strategy (B9); incidental and unexpected finds (B6); biosecurity (weeds/pathogens) (B15), connectivity strategy (B13), riparian vegetation and aquatic biodiversity (B16) • identify priority locations and requirements for bird deterrent measures (B20) …"*

E060 additional reference: Appendix F repeat: B1, printed p5–6, PDF p258–259.

E061 Vegetation clearing procedure and site requirements

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p279–280; PDF p314–315

> *"A Vegetation Clearing Procedure will be prepared as a sub-plan to the BMP that includes: • the requirements to obtain an internal clearing and disturbance permit, prior to the commencement of clearing and disturbance • demarcation and protection of retained vegetation and "no-go" areas • a protocol for fauna management (B10) • a procedure for two-stage clearing (B11) • a protocol for partial clearing (B12) • measures to minimise, manage and re-use vegetation waste, including mulch, logs, and opportunities for millable timber • any restoration or rehabilitation requirements. The Vegetation Clearing Procedure must also identify locations where low-impact, manual and/or hand-clearing will be undertaken for vegetation that exceeds the clearance requirements for the transmission line (with stumps to be retained in-situ), including • Within a 50 m buffer of the top of bank at MacDonald River • Within a 50 m buffer of the top of bank at Barnard River …"*

E061 additional reference: Appendix F repeat: B2, printed p6–7, PDF p259–260.

E062 Sensitive area mapping for final micro siting

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p280; PDF p315

> *"During detailed design, the network operator will identify and map Sensitive Areas to inform further avoidance and micro-siting. This mapping will be updated and maintained throughout construction and will include, as a minimum, the biodiversity constraints as outlined in section 7 of the BDAR, which identifies and prioritises biodiversity values to avoid and minimise impacts on. The Sensitive Area*

Mapping and avoidance framework will be incorporated into the BMP (and GIS/map based site-specific sensitive areas and associated protocols) for construction implementation."

E062 additional reference: Appendix F repeat: B3, printed p7, PDF p260.

E063 Final micro siting informed by any post approval surveys

Work expressly allowed after approval | EIS; 7.7 Mitigation and management; printed p281–282; PDF p316–317

"Micro-site temporary construction infrastructure (including laydown areas, construction ancillary sites and access tracks) to firstly avoid and secondly minimize native vegetation clearing and disturbance of watercourses. Micro-siting will be informed by the biodiversity constraints mapping developed in B3 and the results of any post- approval surveys, will include: • prioritising disturbance in lower condition vegetation (VI <17, and <15 for PCTs representative of Endangered Ecological Communities (EEC)/Critically Endangered Ecological Communities (CEECs) • prioritising avoiding disturbance of Serious and Irreversible Impacts (SAII), Critically Endangered Ecological Communities (CEECs) and Critically Endangered (CE) species • locating transmission infrastructure to minimise impact to vegetated riparian zones • using existing access tracks and clearings • reducing the number of access track waterway crossings and locating waterway crossings at narrow or lower order reaches … Micro-siting outcomes will be incorporated into the BMP, project GIS layers and site-specific plans prior to works."

E063 note: Mixed or conditional timing: the passage contemplates some post approval work or uncertainty while also supporting earlier surveys and avoidance. It does not defer every survey.

E063 additional reference: Appendix F repeat: B5, printed p8–9, PDF p261–262.

E064 Unexpected finds triggers and assessment protocol

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p282–283; PDF p317–318

"An unexpected and incidental finds protocol will be included as a sub- plan to the BMP. The protocol will implemented if threatened species or populations that are assessed by the Biodiversity Development Assessment Report (BDAR) are observed outside of mapped species polygons (incidental find), or if threatened species or populations not assessed by the BDAR are found (unexpected find). The protocol will include: • stop-work triggers for both unexpected and incidental finds • assessment requirements to quantify extent of impact • notification of Conservation Programs, Heritage and Regulation (CPHR) and other relevant stakeholders • adaptive responses including survey, review of clearing limits, further assessment • implementation of impact avoidance and minimisation and/or additional mitigation measures. Unavoidable impacts to unexpected finds must be quantified, and consultation undertaken with DPHI and CPHR on whether additional mitigation measures will be required. This may include offset calculation for residual impacts to threatened species that were not assessed in the EIS and /or threatened species that were assessed but subsequently removed. …"

E064 additional reference: Appendix F repeat: B6, printed p9–10, PDF p262–263.

E065 Clearing and disturbance tracking methods

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p283–284; PDF p318–319

"A Clearing and Disturbance Tracking procedure will be prepared (independent of the BMP) that will include: • demonstrated compliance with the requirements of the Vegetation Clearing protocol (B2) for each vegetation clearing stage • documentation of methods and machinery used in partial and full clearing areas • a methodology for tracking clearing and disturbance for each vegetation clearing stage, including separate accounting for full and partial clearing • a program for reporting the extent of clearing and disturbance against the approved limits to CPHR and any other relevant stakeholders • a methodology for the post-clearing verification of the extent of clearing and disturbance within a vegetation clearing stage. Where partial clearing is to occur, post-clearing verification monitoring and reporting (if required) will be undertaken in accordance with the requirements of the project approval

conditions. The Clearing and Disturbance Tracking procedure is to be updated and maintained throughout construction. Audit-ready records, including spatial data, land survey data and supporting recent imagery (where available), will be maintained to enable independent auditing and regulatory review."

E065 additional reference: Appendix F repeat: B7, printed p10, PDF p263.

E066 Rocky habitat construction constraints and mitigation

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p284; PDF p319

"Prior to works within 100 m of mapped species polygons for rocky- habitat specialist species, including Brush-tailed rock wallaby, Large- eared Pied Bat, Large Bent-wing Bat, and Eastern Cave Bat, engage a suitably qualified ecologist to confirm presence of threatened fauna, and determine any construction activity constraints (for example noise and vibration levels, blasting) and relevant monitoring and mitigation measures (for example use of specific plant/machinery to minimize noise and vibration impacts, exclusions measures for microbat roosting caves within areas to be cleared). Areas of relevant rocky habitat are to be mapped in the BMP and identified in GIS layers and site plans as Sensitive Areas."

E066 additional reference: Appendix F repeat: B8, printed p11, PDF p264.

E067 Artificial hollow replacement numbers types and locations

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p285; PDF p320

"A Supplementary Hollow and Nest Strategy will be prepared as a sub- plan to the BMP and will be implemented to provide alternative roosting and nesting habitat for fauna displaced by clearing. The number and size of hollows to be removed from the disturbance footprint will be used to inform the number and type of artificial hollows required to be installed in the surrounding areas. The use of artificial hollows will include a range of hollow sizes (for example small, medium, and large) and reflect the natural range and density of hollow sizes recorded in the clearing extent. The Strategy will define replacement numbers based on the number and types of hollows removed, the process for determining landholder- approved locations and installation timing, including installation targets before clearing and timeframes for installation after clearing. A Trigger Action Response Plan (TARP) will be provided to address delays or underperformance against installation or effectiveness targets. ..."

E067 additional reference: Appendix F repeat: B9, printed p11–12, PDF p264–265.

E068 Fauna survey and management protocol

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p285–286; PDF p320–321

"A fauna management protocol will be prepared as a sub-plan to the BMP that includes: • a process for how surveys will be conducted by a suitably qualified ecologist prior to clearing. Surveys will confirm that protection measures are in place and include fauna searches, hollow inspections, relocation and identification of nesting fauna and habitat features that require relocation and/or further management during clearing • outlines specific management measures for each fauna group with reference to known threatened species and will include, rubbish controls, vehicle-strike controls, and monitoring of use of key habitat features such as caves/cliff lines/turtle-nesting habitat within proximity of construction • identifies fauna relocation areas and locations for salvaged natural habitat materials (including bush rock and logs) ... • outlines the requirements for post-clearing reports, to be prepared for each vegetation clearing stage. Post-clearing reports will document all fauna interactions, any mortality and outcomes during clearing, details on hollows cleared, their characteristics and occupancy, and quantities and locations of salvaged hollows and logs, and bush rock reused for habitat supplementation ..."

E068 additional reference: Appendix F repeat: B10, printed p12–13, PDF p265–266.

E069 Partial clearing methods and locations

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p287–288; PDF p322–323

> *"A Partial Clearing Protocol will be prepared as part of the Vegetation Clearing Protocol (a sub-plan to the BMP) that defines clearing methods for disturbance area B. … • identifies areas where hand-clearing is to occur (as a minimum, at the locations identified in section 7 of the BDAR) • assume that removal of root balls and root stock will be avoided except where required for civil/construction footprints, with root zones retained in situ wherever practicable and hand clearing used in mapped sensitive areas … • document post-clearing inspections to verify compliance with partial-clearing requirements and meet verification reporting requirements , including, where relevant: data collection requirements; randomly selected point-based monitoring at representative locations; recording of clearing machinery types used; documentation of mulch cover and depth; BAM plots suitable to derive Vegetation Integrity scores and exotic flora cover and species richness against baseline data; and recommendations for changes to clearing methods where targets are not likely to be met. …"*

E069 additional reference: Appendix F repeat: B12, printed p13–14, PDF p266–267.

E070 Connectivity locations and artificial fauna crossing structures

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p288–289; PDF p323–324

> *"A Connectivity Strategy will be developed as a sub-plan to the BMP. The Connectivity Strategy will be prepared in consultation with CPHR that outlines measures to maintain and provide habitat connectivity for target fauna species susceptible to habitat fragmentation, including (but not limited to) koalas, Squirrel gliders, Southern Greater Gliders and Yellow-bellied gliders. … • identify locations for habitat connectivity corridors to be retained (that is, in gullies and/or riparian zones), including as a minimum, the 27 indicative habitat corridors identified in the BDAR (their locations to be determined during detailed design) … • prescribe the number, type and location of structures to be installed (for example glider poles, koala refuge poles, rope bridges), with locations to be developed in consultation with relevant landholders. As a minimum, the provision of an artificial crossing structure every 500 m in areas of full clearing (easement- wide) will be investigated …"*

E070 additional reference: Appendix F repeat: B13, printed p14–15, PDF p267–268.

E071 Biosecurity arrangements and controls

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p289–290; PDF p324–325

> *"The Biosecurity Management Plan will be prepared as a sub-plan to the BMP and will include measures to prevent the introduction and spread of weeds, pathogens, pests and diseases. As a minimum, controls will include wash-down facilities and procedures for vehicles, machinery and footwear at designated entry/exit points; access management zones where pathogens are detected to prevent spread, requirements for suppliers to certify imported soils/materials are clean and free of contaminants/weeds/pathogens; pre-clearing weed mapping, herbicide treatment and recording. The Biosecurity Management Plan will be prepared in accordance with the document Saving Our Species Hygiene Guidelines – Protocols to protect priority biodiversity areas in NSW from Phytophthora cinnamomi, myrtle rust, amphibian chytrid fungus and invasive plants (NSW DPIE 2020)."*

E071 additional reference: Appendix F repeat: B15, printed p16, PDF p269.

E072 Aquatic habitat mapping buffers and controls

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p290–291; PDF p325–326

> *"A Riparian Vegetation and Aquatic Biodiversity Management Plan (RVABMP) will be prepared as a sub-plan to the BMP, to minimise impacts on riparian vegetation and threatened aquatic species, including turtles and amphibians. The RVABMP will: • identify threatened species aquatic habitat,*

including threatened turtle habitat and nesting areas, frog habitat, crayfish and threatened fish habitat, ground-truthed riparian zones/buffers … • outline clearing requirements within vegetated riparian zones, including where hand-clearing is required, how root systems and trunk bases will be retained in situ and using hand-clearing for all partial clearing riparian zones and within 10 m from top of bank (top of bank confirmed by on site assessment) • outline avoidance measures to minimise impacts on threatened aquatic species, including no transmission infrastructure or transmission easement-related disturbance to occur within 50m of the top of bank for the MacDonald River and Barnard River, and how waterway crossings near turtle and frog habitat will be avoided where practicable …"

E072 additional reference: Appendix F repeat: B16, printed p16–17, PDF p269–270.

E073 Biodiversity lighting design

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p291; PDF p326

"Where lighting is required, lighting will be designed in accordance with the National Light Pollution Guidelines for Wildlife (Commonwealth DCCEEW 2023) and will include directional lighting to minimise spill and direct temporary construction lighting away from remnant vegetation wherever possible. Permanent lighting (during operation) would be installed at energy hubs and switching stations, communications infrastructures (as required) and maintenance facilities."

E073 additional reference: Appendix F repeat: B17, printed p17, PDF p270.

E074 Additional bird diverter locations

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p291; PDF p326

"Bird diverters (flappers) will be installed on transmission lines at intervals at priority locations. As a minimum, priority locations are those identified in the BDAR, with additional locations to be determined during detailed design by a qualified ecologist in consultation with CPHR. Priority locations may include near riparian corridors, connectivity corridors and known threatened cockatoo owl/raptor records and key habitats. Installation will occur during line stringing or within 6 months following line installation, to be determined in consultation with CPHR. Diverters will be maintained for the life of the project. Record and provide spatial data to CPHR identifying diverter locations, within 6 months of installation."

E074 additional reference: Appendix F repeat: B18, printed p17–18, PDF p270–271.

E075 Biodiversity monitoring triggers and corrective actions

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p292; PDF p327

"Include a Biodiversity Impact Monitoring Plan (BIMP) as part of the BMP. The BIMP will include a structured monitoring program with annual reporting and an adaptive management component with quantitative triggers and corrective actions (that is, as outlined in a TARP). The BIMP must consolidate the monitoring and adaptive management requirements for all BMP subplans identified in this table. The outcomes of the BIMP will be monitored and evaluated by a suitably qualified biodiversity technical specialist as part of the Independent Environmental Audits carried out for the project."

E075 additional reference: Appendix F repeat: B20, printed p18, PDF p271.

E076 Unexpected impact assessment and response procedure

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p293; PDF p328

"Procedure will include stop-work triggers, requirements for additional assessment/ecologist input in line with current legislative requirements for non-approved impacts, notification and reporting to relevant agencies, and adaptive management requirements."

E076 additional reference: Appendix F repeat: B22, printed p19, PDF p272.

E077 Operational biodiversity management procedures

Details left for later design, delivery or operation | EIS; 7.7 Mitigation and management; printed p293; PDF p328

> *"Operational biodiversity management procedures will be developed within the network operator's Environmental Management Strategy (EMS)/Operation Environmental Management Plan (OEMP) to implement biodiversity commitments including incident management, monitoring requirements, vegetation management commitments (including weed management, ongoing habitat protection requirements, operational sediment and erosion controls, and any restoration measures) and avoid unnecessary disturbance in retained and partially cleared native vegetation areas."*

E077 additional reference: Appendix F repeat: B23, printed p19, PDF p272.

E078 Revised biodiversity assessment after exhibition

Information promised for a Submissions or Amendment Report | EIS; 7.9 Further investigation; printed p295; PDF p330

> *"While the BDAR assessment is considered robust to meet the requirements of the BAM and based on conservative assumptions where there is uncertainty, EnergyCo is committed to carrying out further ecological surveys and assessments where practicable to continue to refine the understanding of the potential biodiversity impacts of the project as additional land becomes accessible. Therefore, further ecological surveys and assessments will be undertaken between exhibition of the EIS and lodgement of the Submissions Report / Amendment Report, which will include a revised BDAR."*

8 | Aboriginal heritage

E079 Archaeological predictive model refinement

Unresolved details with no stated completion stage | EIS; 8.1.3 Predictive model; printed p302; PDF p337

> *"An example of the predictive model sensitivity mapping is provided on Figure 8.2. The predictive model is shown within Appendix K of the ACHA (refer to Technical Report 2). The model has been developed through an iterative process and refined using available datasets and field data, including survey and test excavation results, to improve its alignment with observed archaeological patterns and the distribution of Aboriginal objects and areas of PAD. As additional survey and investigation data become available, the predictive model will continue to be reviewed and refined to support future assessment and survey planning across the project area."*

E080 Full heritage assessment of additional camps

Information promised for a Submissions or Amendment Report | EIS; 8.2.7 Recently identified ancillary sites; printed p317; PDF p352

> *"Both of these locations would be subject to full assessment in the addendum ACHA as part of the Submissions Report and Amendment Report, including archaeological survey following the ACHA survey methodology and RAP participation and consultation."*

E081 Further testing of significant archaeological deposits

Details left for later design, delivery or operation | EIS; 8.3 Avoidance measures; printed p321; PDF p356

> *"Two PADs of high archaeological significance may be subject to partial impact by the project. This includes NEREZ_SpringCk_PAD8, however, the current disturbance footprint (based on reference design) indicates that any impact would be peripheral to the PAD and further testing would be required to understand if archaeological deposit would occur in the final detailed design disturbance footprint. The other PAD of high archaeological significance, NEREZ_AtchesonsCk_PAD1, is also likely to be partially impacted. It should be noted that this PAD extends within and beyond the entire project area*

transmission alignment and therefore the project must intersect it at some point for access across Atchesons Gully. Nevertheless, the EIS disturbance footprint (based on the reference design), does not intersect with the portions of this PAD that contained the highest artefact frequencies and significant cultural material (through test excavation). Overall, potential impacts to PADs would be managed through archaeological excavation where relevant."

E082 Final heritage avoidance through detailed design

Details left for later design, delivery or operation | EIS; 8.4 Potential impacts; printed p321; PDF p356

"The assessment of potential impacts to known Aboriginal sites/PADs adopts a conservative, worst case scenario of potential impact, with the assessment assuming that all Aboriginal sites and PADs within the project area would be impacted, except for those that have been assigned no-impact areas. While this approach is necessary to maintain flexibility during project detailed design, it is likely to overestimate the scale of potential impacts to Aboriginal cultural heritage values. EnergyCo will continue to seek opportunities to avoid impacts as the project design is refined during detailed design."

E082 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E083 Additional sites to be avoided

Details left for later design, delivery or operation | EIS; 8.4.1 Direct impacts; printed p322; PDF p357

"Table 8.6 provides a summary of the impact assessment in relation to impacts on known Aboriginal surface sites and PADs. For the purpose of this assessment, the areas designated as 'no-impact' areas are excluded from potential impact within the project area, as there is a commitment that Aboriginal sites or PADs within them would be avoided. EnergyCo has committed to avoidance through no-impact areas to a total of 38 sites/PADs in the project area. This number is expected to increase as detailed design progresses and continues to seek further opportunities to avoid impacts."

E084 Unconfirmed archaeological significance without site cards

Unresolved details with no stated completion stage | EIS; 8.4.1 Table 8.6 Significance categories for Aboriginal sites and PADs; printed p322; PDF p357

"Significance to be confirmed (no site card available and subject to survey)"

E085 Unconfirmed significance pending test excavation

Unresolved details with no stated completion stage | EIS; 8.4.1 Table 8.6 Significance categories for Aboriginal sites and PADs; printed p322; PDF p357

"PADs with significance to be confirmed (requiring test excavation)"

E086 Further avoidance of open artefact sites

Details left for later design, delivery or operation | EIS; 8.4.1 Direct impacts; printed p323; PDF p358

"Overall, the majority of potential impacts would be to approximately 99 open artefact sites of low archaeological significance (approximately 45 per cent of sites currently within the project area). This site type is the most common and widespread site type and complete avoidance of such sites is often unfeasible in the context of large-scale developments. Notwithstanding, EnergyCo has sought to avoid impacts with 21 open artefact sites having been designated for avoidance through no- impact areas and further avoidance to be considered as part of detailed design. To address these impacts, all open stone artefact sites that would be subject to impact will be collected as mitigation as outlined in Section 8.5."

E087 Archaeological deposit confirmation through excavation

Unresolved details with no stated completion stage | EIS; 8.4.1 Direct impacts; printed p323; PDF p358

> *"PAD avoidance (either confirmed deposit or subject to confirmation through test excavation) is another inherent challenge for the project, as PAD areas are typically much larger than individual site boundaries and often encompass entire landforms. A total of 7 PADs have been designated for avoidance at this stage. Most project impacts to PADs would be partial (as opposed to total) impact. Most potential impacts would occur in areas of subsurface deposit assessed to have low archaeological significance. However, 2 PADs of high archaeological significance (at Spring Creek and Atchesons Gully) may be subject to partial impact by the project as full avoidance is not feasible. Potential impacts to PADs will be managed through archaeological excavation where relevant (refer to Section 8.5)."*

E088 Site specific heritage vibration assessment

Details left for later design, delivery or operation | EIS; 8.4.2 Indirect impacts; printed p323; PDF p358

> *"Indirect impacts to Aboriginal archaeological sites include impacts that may occur beyond the immediate area of ground disturbance or vegetation removal resulting from project construction activities. Vibration is a potential source of indirect impact but is relevant only to site types that are susceptible to vibration-related damage. These types identified in the project area comprise Aboriginal rock shelters and standing, dead CMTs. Potential impacts associated with construction vibration will be assessed based on the sensitivity of Aboriginal sites and PADs to the proposed works, with appropriate construction methodologies implemented where a risk of vibration-related impact is identified."*

E089 Unknown heritage impacts on inaccessible land

Unresolved details with no stated completion stage | EIS; 8.4.4 Potential impacts to unknown Aboriginal heritage values; printed p324; PDF p359

> *"The nature and extent of potential impacts to Aboriginal cultural heritage values are yet to be confirmed through field survey in areas that were not accessible. This includes relevant portions of the project area that have not been subject to archaeological survey and areas of PAD that require further consideration through archaeological test excavation."*

E090 Final disturbance and heritage intersections

Details left for later design, delivery or operation | EIS; 8.4.4 Potential impacts to unknown Aboriginal heritage values; printed p324; PDF p359

> *"Based on the disturbance footprint (which is based on the reference design), the estimated likely extent of disturbance is in the order of 3,579 hectares. Whilst the ACHA has considered the potential for impact to all sites and PADs within the project area (being 10,928 hectares), with the exception of no-impact areas, the actual extent of impacts based on the detailed design is expected to be much lower, noting it would be based on the disturbance footprint for the detailed design and how it intersects with sites and PADs."*

E090 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E091 ACHMP investigations methods and management protocols

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p327; PDF p362

> *"An Aboriginal Cultural Heritage Management Plan (ACHMP) will be developed in consultation with Heritage NSW and RAPs. It will provide details of: • processes for further investigation and assessment in relevant areas and at relevant sites • all Aboriginal sites and places of significance relevant to the project area • management measures (for example avoidance, protection and salvage) and the methods for how they will be implemented • measures to ensure ongoing consultation and involvement of RAPs in the management of their cultural heritage values • if relevant and practicable, RAP access arrangements for a selection of significant sites for educational purposes • protocols for recording,*

assessing and managing newly identified sites at any phase of the project • protocols for educating staff and contractors of their obligations relating to Aboriginal cultural heritage values through a site induction process • protocols for suspected human skeletal materials • protocols for the ongoing care of salvaged Aboriginal objects • provisions for review and updates of the ACHMP."

E091 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E091 additional reference: Appendix F repeat: AH1, printed p19–20, PDF p272–273.

E092 No impact areas identified and managed after approval

Work expressly allowed after approval | EIS; 8.5.1 Mitigation and management measures; printed p327–328; PDF p362–363

"Avoidance and/or protective measures will be employed to Aboriginal sites and PADs that are within the project area, and for any sites that are outside the project area but at risk of indirect vibration impacts, where practicable. The primary mechanism for avoidance will be the establishment of no-impact areas within the project area that can be applied to the entirety or a portion of a site or PAD as a project commitment to avoid impact. 'No-impact' areas will be applied to sites and PADs within the project area that can be avoided, including sites already recorded and those identified through future investigations. The ACHMP will set out the process for identifying, documenting, and managing 'no-impact' areas following project approval."

E092 additional reference: Appendix F repeat: AH2, printed p20, PDF p273.

E093 Heritage barriers buffers and monitoring requirements

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p328–329; PDF p363–364

"Active protection will involve the establishment of physical barriers between Aboriginal sites and/or PADs and the disturbance footprint prior to project construction occurring in their vicinity. The nature and extent of physical barriers will be responsive to the site type requiring protection. Active protection will be required for all no-impact areas and avoided Aboriginal sites and/or PADs located within 20 m of the final disturbance footprint. The ACHMP will set out detailed requirements for the implementation of these measures, including: • the types of materials used (for example fencing or bollards) and whether they will be temporary or permanent installations. The selection of protection measures will be determined during preparation of the ACHMP, having regard to site-specific factors including land use, stock type and grazing practices, landholder consultation, and the practicality and effectiveness of alternative controls, including electronic exclusion measures where appropriate …"

E093 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E093 additional reference: Appendix F repeat: AH3, printed p21–22, PDF p274–275.

E094 Site specific vibration protection in the ACHMP

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p329–330; PDF p364–365

"Vibration-sensitive Aboriginal sites that are scheduled within 'no-impact' areas will be subject to additional measures to avoid project related vibration impact. This will apply to such sites that are within the minimum distances to avoid vibration impacts as identified in the ACHA (Technical Report 2) and summarised in Table 16.17 of the EIS. Where there is risk of vibration impact to vibration-sensitive sites within 'no impact' areas, the ACHMP will set out additional measures to prevent or mitigate vibration impacts. This will include but not be limited to: • consultation with vibration specialist to understand full nature and extent of potential vibration impacts (for example cosmetic, structural) in relation to the individual Aboriginal site proposed to be impacted … • the ACHMP will outline the methodology and procedure for mitigating and/or managing indirect impacts that cannot be avoided through the detailed design stage of the project …"

E094 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E094 additional reference: Appendix F repeat: AH5, printed p22–23, PDF p275–276.

E095 Artefact collection methods and completion criteria

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p330–331; PDF p365–366

> *"Surface artefact collection will apply to all identified surface artefact sites (primarily stone artefacts) that will otherwise be impacted by the final disturbance footprint. Surface artefact collection will be undertaken by a suitably qualified archaeologist with RAP representatives (field team) and will occur prior to any project-related ground disturbance in the vicinity of the relevant sites. … • site coordinates for each site will be entered into mobile GPS devices to re-locate and confirm locations • the general vicinity of each site location will be inspected by the field team. Stone artefacts will be flagged on the ground and a photo taken of the flagged site. Each flagged artefact will be marked as a waypoint in the GPS • all artefacts will be collected into snap lock plastic bags or similar, marked with the project name, site name, collection date and waypoint number. …"*

E095 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E095 additional reference: Appendix F repeat: AH6, printed p24–25, PDF p277–278.

E096 Salvage methodology and specific salvage sites

Work expressly allowed after approval | EIS; 8.5.1 Mitigation and management measures; printed p331–333; PDF p366–368

> *"A salvage excavation methodology will be developed as part of the ACHMP and be implemented as a post-approval measure. Salvage excavation will need to respond to how the final project disturbance footprint intersects with PADs with confirmed deposits, and therefore this ACHA does not provide a salvage excavation methodology, nor has nominated specific sites for salvage. The salvage methodology will: • include a strategy or research design in consultation with RAPs so that salvage can be tailored to research questions • establish thresholds for Phase 1 excavation that trigger Phase 2 open area/salvage • establish limits for open area excavation so that expectations for maximum salvage extents are established prior to salvage fieldwork • include contingency protocols for additional consultation with RAPs and Heritage NSW should the salvage methodology require modification."*

E096 note: The explicit post approval wording and absent salvage methodology or sites are on printed p333, PDF368.
E096 additional reference: Appendix F repeat: AH7, printed p25–27, PDF p278–280.

E097 Culturally modified tree verification and salvage process

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p333–334; PDF p368–369

> *"Avoidance is the preferred management approach for culturally modified trees. … Where practicable, avoidance will be achieved through project design refinement and micro- siting of infrastructure. If confirmed to be a culturally modified tree, the ACHMP will detail a process to salvage NEREZ_SpringCk_ST1 and any additional culturally modified trees identified during future archaeological survey that are unavoidable. … • an arboriculturist or arborist with demonstrated expertise in Aboriginal culturally modified tree management will be engaged to determine a suitable removal method in consultation with RAPs relevant to the locality of the tree. This may involve the requirement to saw the tree above the scar location allowing a suitable buffer from the scar feature. The process of removal will be photographed … Any treatment option would be completed in consultation with RAPs and a suitably qualified curator • where feasible, the tree will be relocated to a nominated location using suitable materials in consultation with RAPs relevant to the locality of the tree …"*

E097 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E097 additional reference: Appendix F repeat: AH8, printed p28–29, PDF p281–282.

E098 Salvage reporting and analysis requirements

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p334; PDF p369

> *"A salvage report will be prepared to document all completed salvage measures. The ACHMP will detail the requirements of salvaging reporting and relevant analysis, along with RAP consultation requirements."*

E098 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332
E098 additional reference: Appendix F repeat: AH9, printed p29, PDF p282.

E099 Criteria for significance salvage and unmitigated impact

Details assigned to a post approval plan or process | EIS; 8.5.1 Mitigation and management measures; printed p335; PDF p370

> *"Unmitigated impacts may apply to PADs that have been assessed as being of low archaeological significance and are located within the approved project disturbance footprint. For PADs requiring further investigation, significance will be assessed through test excavation in accordance with the ACHMP. The ACHMP will establish clear criteria and thresholds for: • determining archaeological significance • identifying when salvage excavation is required • identifying when unmitigated impact is an appropriate management outcome. Unmitigated impact may also apply to other Aboriginal heritage sites where salvage is not considered appropriate or has not been supported through consultation with RAPs."*

E099 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E099 additional reference: Appendix F repeat: AH12, printed p30, PDF p283.

E100 Heritage commitments carried forward after approval

Work expressly allowed after approval | EIS; 8.5.2 Further investigation and assessment; printed p336; PDF p371

> *"Further investigation and assessment is proposed to address the limitations associated with land access constraints and to further inform Aboriginal cultural heritage management for the project. As access becomes available, additional Aboriginal consultation, archaeological survey, test excavation, predictive model review, CMT verification, cultural values investigations and impact assessment will be undertaken either prior to project approval or, where required, post-approval through the ACHMP. The timing of these activities will depend on land access availability, with any commitments not completed prior to project approval to be carried forward and implemented through the ACHMP (should the project be approved)."*

E101 Camp heritage surveys in the addendum

Information promised for a Submissions or Amendment Report | EIS; 8.5.2 Further investigation and assessment; printed p336; PDF p371

> *"Additionally, survey will be employed to additional areas to be incorporated into the project area for the Submissions Report and Amendment Report, where access is available. This may include the proposed Camp 3 and Camp 1 Alternate locations which were identified after completion of the ACHA fieldwork. This will be subject to further assessment in the addendum ACHA."*

E102 Archaeological survey coverage and remaining uncertainty

Work expressly allowed after approval | EIS; 8.5.2 Further investigation and assessment; printed p337–338; PDF p372–373

> *"Archaeological survey by archaeologists and RAP representatives will be conducted in unsurveyed portions of the project area (including any additional area to be incorporated into the project area for the Submissions Report and Amendment Report phase when access is available. Survey methods will be consistent with those employed for the ACHA (Technical Report 2). Survey in unsurveyed portions of the project area will be guided by the predictive model with reference to the following strategy: • accessible*

areas of moderate and high archaeological sensitivity will be prioritised for survey for inclusion in the addendum ACHA prior to project approval. … This would reduce the uncertainties around impact and management carried into the post-approval phase. • survey coverage intensity will be greater on landforms in areas of moderate and high archaeological sensitivity in comparison to areas of low archaeological sensitivity. … Notwithstanding, such examples will be considered for their potential to feature Aboriginal rock shelters and targeted for survey if applicable. …"

E102 note: Mixed or conditional timing: the passage contemplates some post approval work or uncertainty while also supporting earlier surveys and avoidance. It does not defer every survey.
E102 additional reference: Appendix F repeat: AH13, printed p30–32, PDF p283–285.

E103 Further archaeological test excavation

Information promised for a Submissions or Amendment Report | EIS; 8.5.2 Further investigation and assessment; printed p338–339; PDF p373–374

"Further archaeological test excavation will aim to be undertaken to inform the Submissions Report and Amendment Report in an addendum ACHA. The scope of testing during this period will be dependent on land access availability and timing considerations for project approval. … This approach would include the following: – testing within and beyond drawn PAD boundaries, where relevant, to establish their extent (for example if testing indicates that artefact distributions may extend beyond the PAD boundary at densities that warrant further exploration) – include sampling of Control Areas in areas of low, moderate and high archaeological sensitivity in areas that are not mapped as PAD. … Project RAPs and Heritage NSW will be provided with further details about additional test excavation in a manner consistent with the ACHA methodology and the Stage 1 test excavation strategy. This will involve nominating the locations for proposed test excavation with a minimum 14-day notification window."

E103 note: Completion before approval is intended or conditional on access and timing; this passage alone does not guarantee completion before determination.
E103 additional reference: Appendix F repeat: AH14, printed p32–33, PDF p285–286.

E104 Predictive model and later investigations

Work expressly allowed after approval | EIS; 8.5.2 Further investigation and assessment; printed p339; PDF p374

"The predictive model will be reviewed based on the outcomes of additional investigations completed for the addendum ACHA. Any refinements to the archaeological sensitivity mapping will be carried into the ACHMP. The intent of the predictive model (as refined) will be to guide further investigation requirements in project area into the post-approval phase for the project."

E104 additional reference: Appendix F repeat: AH15, printed p33, PDF p286.

E105 Songlines impact assessment and unresolved matters

Details assigned to a post approval plan or process | EIS; 8.5.2 Further investigation and assessment; printed p339; PDF p374

"An assessment will be undertaken to clarify and manage potential impacts on Songlines. This will involve: • consultation with Aboriginal knowledge holders to determine whether the project may impact identified Songlines • targeted inspections with relevant knowledge holders where Songlines intersect the project area • assessment of whether any Aboriginal sites that contribute to Songlines and may be affected by the project • development of management measures and design responses to address potential impacts in the addendum ACHA, with any unresolved matters managed through the ACHMP process."

E105 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332.
E105 additional reference: Appendix F repeat: AH16, printed p33, PDF p286.

E106 Culturally significant ecological values assessment

Information promised for a Submissions or Amendment Report | EIS; 8.5.2 Further investigation and assessment; printed p340; PDF p375

"Further investigation and assessment about the potential impact on culturally significant ecological values with be undertaken with the aim to include the outcomes in the addendum ACHA. The scope may include: • further consultation with Aboriginal knowledge holders to identify culturally significant flora and fauna within the project area • targeted site inspections/meetings with relevant knowledge holders in areas where the Songlines intersect with the project area • targeted field investigations to document culturally significant ecological values • assessment of the potential project impacts on culturally significant ecological values and incorporate outcomes into the addendum ACHA • implementation of management measures, including opportunities to incorporate culturally significant ecological values into rehabilitation and revegetation programs where feasible."

E106 note: Completion before approval is intended or conditional on access and timing; this passage alone does not guarantee completion before determination.
E106 additional reference: Appendix F repeat: AH17, printed p34, PDF p287.

E107 Culturally modified tree verification and reporting

Work expressly allowed after approval | EIS; 8.5.2 Further investigation and assessment; printed p341; PDF p376

"The proposed process for verifying culturally modified trees that have been recorded during fieldwork is provided below. This process will be carried into the ACHMP for relevant trees identified in unsurveyed areas. • Step 1: Expert desktop assessment of trees identified during survey which will utilise existing site recording forms and photos. This will assist EnergyCo in prioritising opportunities for avoidance based on this initial assessment. … Step 2 field verification will be required if EnergyCo determines that the tree is at risk of project impact … Each tree will be recorded according to specialist criteria with the aim to reach a determination for the tree • Step 3: The outcomes of the fieldwork, impact assessment and management approach will be documented in the addendum ACHA to inform the Submissions Report and Amendment Report, or in accordance with a process set out in the ACHMP if completed after project approval."

E107 additional reference: Appendix F repeat: AH19, printed p35–36, PDF p288–289.

9 | Historical heritage

E108 9.3.2 Avoidance to historical heritage within the project area

Details left for later design, delivery or operation | EIS; 9.3.2 Avoidance to historical heritage within the project area; printed p373; PDF p408

"Potential indirect impacts from construction vibration would be avoided for listed heritage items and 2 potential heritage items within the study area (the project area, with a 50 metre buffer) by requiring minimum safe working distances for vibration intensive equipment. If this cannot be achieved, alternative construction methodologies will be investigated and implemented."

E109 9.3.2 Avoidance to historical heritage within the project area

Details left for later design, delivery or operation | EIS; 9.3.2 Avoidance to historical heritage within the project area; printed p373; PDF p408

"The mitigation measures described in Section 9.5.1, along with continued development of the detailed design and construction methodology for the project would aim to further avoid and/or minimise the residual direct and indirect impacts associated with vibration as part of the project where possible. In instances where direct and indirect impacts cannot be avoided, the mitigation measures included in Section 9.5 would be implemented to minimise the impacts where possible."

E110 9.4 Potential impacts

Details left for later design, delivery or operation | EIS; 9.4 Potential impacts; printed p373; PDF p408

> *"The assessment of impacts on listed heritage items has adopted a conservative, worst case scenario of potential impact, with the assessment assuming that all heritage items within the project area could be impacted, except for those that have been assigned no-impact areas. While this approach is necessary to maintain flexibility during continued development of the project's design and construction methodology, it is likely to overestimate the scale of impacts to historical heritage values. EnergyCo has committed to implement a process to continue to seek opportunities to further avoid impacts as the project design is refined during detailed design, where possible."*

E110 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E111 9.4.3 Impacts to areas of historical archaeological potential

Details left for later design, delivery or operation | EIS; 9.4.3 Impacts to areas of historical archaeological potential; printed p375; PDF p410

> *"These areas of historical archaeological potential have been assessed as being of local heritage significance. The detailed design process would confirm the full extent of potential impacts to these areas and would take into consideration the mitigation measures proposed for these areas."*

E112 9.5.1 Management and mitigation measures

Details left for later design, delivery or operation | EIS; 9.5.1 Management and mitigation measures; printed p376; PDF p411

> *"EnergyCo is committed to seek opportunities for further avoidance of historical heritage impacts as part of the detailed design process. Mitigation and management measures to be implemented to avoid, minimise and manage potential direct and indirect impacts to historical heritage are detailed in Table 9.5."*

E113 HHMP sites investigations and detailed methods

Details assigned to a post approval plan or process | EIS; 9.5.1 Management and mitigation measures; printed p377; PDF p412

> *"A Historical Heritage Management Plan (HHMP) will be prepared in consultation with Heritage NSW. The HHMP will be prepared (and approved) prior to the commencement of construction and will include as a minimum: • all listed heritage items, potential heritage items and areas of archaeological potential relevant to the project area • processes for further investigation (including archaeological) and assessment if identified to be required, including unsurveyed portions of the project area as access becomes available • nominated management measures (for example avoidance, protection and archaeological management) and the methods for how they will be implemented • protocols for recording, assessing and managing newly identified historical heritage elements at any phase of the project • protocols for educating staff and contractors of their obligations relating to historical heritage through a site induction process • protocols for unexpected heritage finds, including protocols for suspected human skeletal remains • provisions for review and updates of the HHMP."*

E113 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520.
E113 additional reference: Appendix F repeat: HH1, printed p36–37, PDF p289–290.

E114 Additional historical heritage no impact areas

Details assigned to a post approval plan or process | EIS; 9.5.1 Management and mitigation measures; printed p378; PDF p413

> *"Avoidance and protective measures will be employed for historical heritage items within the project area that are to be retained, as well as historical heritage located in the immediate vicinity of the project area. This will include the development and implementation of no-impact areas as set out in Table 11.2*

of the HHIA and future no-impact areas as determined by future assessments in unsurveyed areas, detailed design process and/or the implementation of the HHMP."

E114 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520.
E114 additional reference: Appendix F repeat: HH3, printed p37, PDF p290.

E115 Historical heritage barrier requirements

Details assigned to a post approval plan or process | EIS; 9.5.1 Management and mitigation measures; printed p378; PDF p413

"Physical barriers and appropriate signage (when necessary) will be established between no-impact areas (including listed heritage items, potential heritage items and/or areas of historical archaeological potential) and the disturbance footprint prior to project construction occurring in their vicinity. The HHMP will set out detailed requirements for the implementation of these measures."

E115 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520.
E115 additional reference: Appendix F repeat: HH4, printed p37, PDF p290.

E116 Historical heritage vibration protection

Details assigned to a post approval plan or process | EIS; 9.5.1 Management and mitigation measures; printed p379; PDF p414

"Historical heritage items (both listed and potential historical items with built elements) should be assessed to determine whether they are vibration sensitive. Vibration-sensitive historical heritage items (both listed and potential historical items with built elements) will be protected from project related vibration impacts, through the implementation of no impact areas and/or the development of alternative construction methodologies where minimum working distances for vibration intensive equipment cannot be met. Protection measures will be detailed in the HHMP and will apply to all potential items and items that are listed in Section 9.2.1 and Section 9.2.2 of the HHIA."

E116 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520.
E116 additional reference: Appendix F repeat: HH6, printed p38, PDF p291.

E117 Archaeological monitoring research design and methods

Work expressly allowed after approval | EIS; 9.5.1 Management and mitigation measures; printed p379; PDF p414

"Archaeological monitoring will be undertaken within the access track and road upgrade areas where ground disturbing works are proposed within identified areas of historical archaeological potential. Archaeological monitoring within the access track and road upgrade areas will be guided by a location-specific archaeological research design and work method statement to ensure the archaeological monitoring methodology is appropriate for the location, predicted archaeological remains and the required project works. The archaeological research design and work method statement will be developed in consultation with Heritage NSW as part of the HHMP and implemented as a post-approval measure."

E117 additional reference: Appendix F repeat: HH7, printed p38–39, PDF p291–292.

E118 Additional archaeological investigations and methods

Work expressly allowed after approval | EIS; 9.5.1 Management and mitigation measures; printed p380; PDF p415

"Additional archaeological investigation or monitoring will be undertaken as required by the results of the test excavation or monitoring. If required, an archaeological research design and work method statement for the proposed locations of archaeological investigation or monitoring will be developed in consultation with Heritage NSW as part of the HHMP and implemented as a post-approval measure."

E118 additional reference: Appendix F repeat: HH9, printed p39, PDF p292.

E119 Location specific archaeological research design

Details left for later design, delivery or operation | EIS; 9.5.1 Management and mitigation measures; printed p380; PDF p415

> *"A location specific archaeological research design and archaeological work method statement will be prepared for each area of archaeological potential that will be subject to ground disturbance as part of the project. The archaeological research design and work method statement will be prepared in accordance with the relevant Heritage NSW guidelines. It will be prepared in consultation (and endorsed by) Heritage NSW prior to any on-site archaeological works being undertaken."*

E119 additional reference: Appendix F repeat: HH10, printed p40, PDF p293.

E120 Targeted historical heritage surveys before or after approval

Work expressly allowed after approval | EIS; 9.5.1 Management and mitigation measures; printed p381; PDF p416

> *"Additional targeted survey and visual inspection will be conducted in unsurveyed portions of the project area before and/or after project approval. Survey methods will be consistent with those employed for this HHIA. Survey reporting will align with the relevant stage of the project. All newly identified historical heritage will be subject to significance and impact assessments and assigned a proposed management measure. All newly identified historical heritage at risk of project impact would be assigned an appropriate mitigation measure which will be consistent with that proposed for known potential items and areas of archaeological potential in the project area."*

E120 additional reference: Appendix F repeat: HH12, printed p40–41, PDF p293–294.

E121 Unfinished historical heritage field investigations

Unresolved details with no stated completion stage | EIS; 9.5.2 Further investigation and assessment; printed p382; PDF p417

> *"Further investigation and assessment is proposed to inform aspects of historical heritage management for the project due to land access being unavailable in some areas. As access becomes available, additional field investigations are proposed and the assessment of impacts and associated management measures will be supplemented as this work is completed."*

E122 Historical heritage matters carried past determination

Work expressly allowed after approval | EIS; 9.5.2 Further investigation and assessment; printed p382; PDF p417

> *"Subject to additional land access becoming available post EIS, it is currently proposed that an addendum to the HHIA (referred to as the addendum HHIA) would be prepared to inform the project Submissions Report / Amendment Report. The addendum HHIA would document the findings of any additional field investigations (including survey / visual inspection) and update the impact assessment findings and management measures, where relevant. Any matters not resolved through the addendum HHIA would be addressed post-determination of the project through the preparation and implementation of an HHMP (should the project be approved) as outlined in Section 9.5.1."*

10 | Social

E123 Social impact targets monitoring and adaptive responses

Details left for later design, delivery or operation | EIS; 10.4 Mitigation and management; printed p407–408; PDF p442–443

> *"The SIM Plan will outline measures to address or manage social impacts and opportunities assessed as having high or medium significance and will describe monitoring arrangements inclusive of performance targets for each measure. Adaptive management protocols or processes will also be outlined in the event that the intended outcomes of the measures are not realised. The SIM Plan will detail measures relating to: • coordination with relevant government agencies and authorities with differing statutory roles and responsibilities, ensuring a consistent and integrated approach to managing project-related, and cumulative impacts … • a dedicated Community Wellbeing Strategy to be prepared and implemented to identify, monitor and manage potential impacts on community health, wellbeing and social cohesion associated with construction and operation of the project. … The effectiveness of the SIM Plan will be monitored through a structured program of performance indicators, data collection, stakeholder engagement and periodic review, enabling comparison of actual outcomes against predicted impacts and community expectations. …"*

E123 additional reference: Appendix F repeat: SO1, printed p41–43, PDF p294–296.

E124 Engagement and landholder strategy details

Details left for later design, delivery or operation | EIS; 10.4 Mitigation and management; printed p408–409; PDF p443–444

> *"The existing project Community and Stakeholder Engagement Plan (CSEP) will be revised and updated to guide ongoing, proactive and responsive engagement with landholders, communities, councils, service providers and Aboriginal and Torres Strait Islanders groups throughout the pre-construction and construction period. The Plan will: • prioritise engagement to support pre-construction activities and detailed construction phase planning • focus on timely notification of construction activities, changes to schedules, access arrangements, traffic movements and potential impacts • identify engagement mechanisms for use that are clear, accessible and plain-language • include mechanisms to ensure culturally appropriate engagement with Aboriginal and Torres Strait Islanders representatives and communities … • include monitoring and adaptive engagement measures to respond to emerging issues and impacts The revised CSEP will also include a dedicated Landholder Engagement Strategy which will be implemented to guide ongoing and consistent engagement with landholders affected by property access, land acquisition and construction activities. …"*

E124 additional reference: Appendix F repeat: SO2, printed p43–44, PDF p296–297.

E125 Local employment procurement targets and partnerships

Details left for later design, delivery or operation | EIS; 10.4 Mitigation and management; printed p410; PDF p445

> *"The Local Industry Participation Plan will be prepared and implemented to facilitate local worker and business participation in the project. The Plan will seek to: • identify targets for local employment and procurement • identify skills gaps to align training provision with project needs • ensure early communication of required skills and occupations through dedicated engagement activities • formalise partnerships with relevant education and training providers (including TAFE NSW, universities and schools) to establish regional training and skills initiatives • outline collaboration pathways with local employment providers to leverage existing networks • initiatives to realise and maximise local and Aboriginal and Torres Strait Islanders participation in direct employment and contracting pathways • ensure a focus on apprenticeships, traineeships, pre-employment and upskilling programs with transferable outcomes, supporting workforce continuity and contributing to longer-term regional capability and legacy employment benefits • coordination with relevant government agencies and Aboriginal and Torres Strait Islanders organisations in the region to deliver targeted skills, employment or training programs for Aboriginal and Torres Strait Islanders young people …"*

E125 additional reference: Appendix F repeat: SO3, printed p44–45, PDF p297–298.

E126 Workforce accommodation and camp management arrangements

Details left for later design, delivery or operation | EIS; 10.4 Mitigation and management; printed p410–412; PDF p445–447

> *"The Plan will also include management measures relating to the establishment and operation of workforce accommodation camps in order to ensure minimisation of impacts on local communities, services and regional housing markets. The Plan will: • outline strategies to balance the use of workforce accommodation with appropriate use of local accommodation, avoiding over-concentration in individual towns, and reducing pressure on, short-term accommodation and vulnerable population groups, particularly focussing on the workforce requirements in the project's enabling works period with consideration into major events and seasonal tourism periods that may affect availability • outline workforce accommodation arrangements for workers who will require housing in short-stay accommodation in the region … • ongoing exploration of opportunities for legacy outcomes following construction, such as repurposing workforce accommodation camp facilities for community use … • outline monitoring arrangements to enable responsive management of unanticipated impacts which will be regularly reviewed to ensure effectiveness over the life of the project …"*

E126 note: The later plan must detail camp arrangements. The EIS already specifies on-site first aid or medic provision, telehealth access and avoidance of reliance on local health services for routine care.
E126 additional reference: Appendix F repeat: SO4, printed p45–47, PDF p298–300.

11 | Landscape and visual

E127 Unassessed visual impacts of additional camps

Information promised for a Submissions or Amendment Report | EIS; 11.4.1 Ancillary infrastructure daytime impacts; printed p430; PDF p465

> *"A viewshed screening analysis was undertaken to identify dwellings with line of sight of the workforce accommodation camps and construction laydown areas. The viewshed assessment identified a limited number of dwellings with potential visibility towards the proposed workforce accommodation camps and associated laydown areas. The potential visual impacts are generally expected to be limited due to the low height of the temporary camp and laydown infrastructure, separation distance from dwellings, intervening vegetation and the temporary nature of the works. Where the camps and laydown areas are located near proposed energy hubs or transmission infrastructure, they are unlikely to materially increase the visual impact already identified for the primary project infrastructure. Additional detail for potentially affected receivers is provided in Table 42 of the LCVIA (refer to Technical Report 5). It is noted that the locations of Camp 3 and Camp 1 Alternate were identified after completion of the visual impact assessment and therefore have not been assessed in detail as part of the LCVIA. Detailed visual impact assessment of both locations would be undertaken following exhibition of the EIS and included in an Amendment Report."*

E128 Further tower review for receiver I 8 D9

Information promised for a Submissions or Amendment Report | EIS; 11.6.1.2 Private receivers; printed p445; PDF p480

> *"EnergyCo is exploring opportunities for local tower placement refinements and tower height reduction within the corridor where feasible. Further consideration on this would be included in the Submissions Report / Amendment Report."*

E129 Further tower review for receiver I 8 DN7

Information promised for a Submissions or Amendment Report | EIS; 11.6.1.2 Private receivers; printed p446; PDF p481

> *"EnergyCo is exploring opportunities for local tower placement refinements and tower height reduction within the corridor where feasible. Further consideration on this would be included in the Submissions Report / Amendment Report."*

E130 Further tower review for receiver I 8 SRA1

Information promised for a Submissions or Amendment Report | EIS; 11.6.1.2 Private receivers; printed p446; PDF p481

> *"EnergyCo is exploring opportunities for local tower placement refinements and tower height reduction within the corridor where feasible. Further consideration on this would be included in the Submissions Report / Amendment Report."*

E131 Ancillary facility visual design and assessment review

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p463; PDF p498

> *"Infrastructure will be designed to reduce visual contrast with the surrounding landscape. This will include the following measures: • a recessive colour palette will be selected for substations, switching stations and ancillary facilities to reduce contrast with the surrounding landscape • unnecessary lighting, signage and external fittings associated with infrastructure will be avoided • low-reflectivity materials and finishes will be used on transmission towers and ancillary structures to minimise glare • substations and switching stations will be sited within the project area to use existing landform or vegetation screening where practicable • the visual footprint of infrastructure will be limited through compact layout and consolidation of elements where practicable • temporary infrastructure not required for ongoing operation will be removed following construction, and disturbed areas will be rehabilitated • building materials and finishes will be selected to support visual integration with the surrounding rural landscape."*

E131 additional reference: Appendix F repeat: LV1, printed p48, PDF p301.

E132 Access track visual design

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p463–464; PDF p498–499

> *"Access tracks will be designed and managed to reduce visual contrast and temporary disturbance. This will include the following: • new access tracks will be designed to minimise earthworks (cut and fill) and avoid unnecessary vegetation removal • existing tracks and roads will be used or upgraded where available to reduce the extent of new disturbance • access tracks not required for operation will be rehabilitated following construction • locally appropriate surface materials will be used where practicable to reduce visual contrast • temporary disturbance areas associated with access tracks will be clearly defined and progressively rehabilitated where practicable."*

E132 additional reference: Appendix F repeat: LV2, printed p48–49, PDF p301–302.

E133 Tower siting height spacing and form

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p464; PDF p499

> *"Transmission line alignment, tower siting and tower design will be reviewed during detailed design to reduce visual prominence where practicable. This will include the following measures: • alignment and tower siting will respond to landform and landscape features to reduce visual prominence, including avoiding skyline locations where practicable • transmission structures will be located to be viewed against more visually complex backgrounds, including vegetation or landform, rather than open sky where practicable • tower placement will consider the relationship between transmission structures*

and sensitive receivers, including avoiding direct alignment within primary view corridors where practicable • separation distances between transmission structures and sensitive receivers will be maximised where practicable • tower height, form and spacing will be considered during detailed design to reduce visual prominence in sensitive areas • tower spacing at road crossings and key viewpoints will be maximised where practicable to reduce visual clutter • standardised tower designs and finishes will be used to maintain visual consistency along the alignment."

E133 additional reference: Appendix F repeat: LV3, printed p49, PDF p302.

E134 Private receiver screening plans

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p465; PDF p500

"Supplementary planting or screening will be offered to landholders and managers of private receivers and sensitive land uses assessed as having moderate or high visual impacts. Planting layouts will be developed with the landholder or relevant manager and will target primary viewing areas, integrate with existing mature vegetation and filter views toward transmission towers, energy hubs, workforce accommodation camps and laydown areas."

E134 additional reference: Appendix F repeat: LV4, printed p50, PDF p303.

E135 Culturally sensitive visual design review

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p465; PDF p500

"Infrastructure located near cultural and sensitive landscape settings will be reviewed during detailed design to minimise visual intrusion where practicable. This will include the following measures: • culturally important view lines, landscapes and heritage values will be considered during detailed design, with infrastructure positioned to minimise intrusion where practicable • impacts to national parks, conservation areas and culturally sensitive locations will be avoided or minimised where practicable."

E135 additional reference: Appendix F repeat: LV6, printed p50–51, PDF p303–304.

E136 Camp and project lighting design

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p466; PDF p501

"Lighting will be designed and managed to minimise light spill, glare and sky glow. This will include the following measures: • lighting associated with energy hubs and ancillary infrastructure sites will be minimised and limited to operational requirements • directional lighting and shielding will be used to reduce light spill to surrounding areas • low-intensity lighting will be used where practicable • lighting will be switched off or reduced when not required for safety or operational purposes • lighting will comply with Australian/New Zealand Standard AS/NZS 4282:2019, Control of the obtrusive effects of outdoor lighting, where applicable."

E136 additional reference: Appendix F repeat: LV7, printed p51, PDF p304.

E137 Rouchel Brook tower refinement and screening

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p467; PDF p502

"During detailed design, EnergyCo will review opportunities to further reduce visual impacts in the Rouchel area (Rouchel Brook and Upper Rouchel). This will include consideration of local tower siting, tower height, tower form, tower spacing, the number of visible towers and the use of landform and retained vegetation to reduce visual prominence. The review will document the design response and any constraints that limit further visual refinement."

E137 additional reference: Appendix F repeat: LV9, printed p52, PDF p305.

E138 Roadside planting approval and design

Details left for later design, delivery or operation | EIS; 11.6.2 Management and mitigation; printed p467; PDF p502

> *"For PVP-07 and other relevant public road viewpoints, existing roadside vegetation will be retained where compatible with road safety and construction requirements. Any localised supplementary planting will be limited to locations where it does not obstruct road safety sightlines or important rural views and will be confirmed with the relevant road authority."*

E138 additional reference: Appendix F repeat: LV11, printed p52, PDF p305.

12 | Land use and property

E139 Property impacts and later landholder engagement

Details left for later design, delivery or operation | EIS; 12.3.2 Property impacts; printed p496; PDF p531

> *"During community engagement, affected landholders raised concerns regarding potential disruption to agricultural operations associated with project construction. EnergyCo has undertaken corridor refinements in response to landholder feedback. Ongoing engagement with affected landholders would continue during detailed design to minimise impacts to landholder agricultural operations during construction."*

E140 National Trail access interactions

Details left for later design, delivery or operation | EIS; 12.3.2 Property impacts; printed p496; PDF p531

> *"As discussed in Section 12.2.3, the National Trail intersects part of the project area. The construction of the project would not prevent the use of the National Trail however temporary access controls may apply at specific locations during critical construction periods. The precise nature and location of any interactions would be confirmed through detailed design, and consultation with the National Trail organisation would be undertaken to provide ongoing access along the route and to provide information about planned access management at these locations."*

E141 Exploration impacts and further consultation

Details left for later design, delivery or operation | EIS; 12.3.4 Mining and exploration; printed p498; PDF p533

> *"Correspondence has been provided to impacted exploration licence holders regarding potential impacts to exploration activities, however, as at mid-August 2026 no responses have been received (refer to Section 5.4.3.2). EnergyCo will continue to consult with NSW Resources and licence holders during detailed design so that opportunities to minimise impacts to exploration activities are considered."*

E142 Forestry construction methods

Details left for later design, delivery or operation | EIS; 12.3.5.1 State forests; printed p499; PDF p534

> *"The project has been developed in consultation with FCNSW including consultation regarding biodiversity and heritage surveys (refer to Section 5). FCNSW would continue to be consulted on construction methodologies and activities as part of continued design development, prior to and during construction activities."*

E143 Future use of surplus acquired hub land

Details left for later design, delivery or operation | EIS; 12.4.1 Land use impacts; printed p502; PDF p537

> *"EnergyCo proposes to acquire approximately 1,185 hectares of land associated with the 5 energy hubs. This acquisition area exceeds the total area required for the permanent infrastructure and associated operational area for each of the energy hubs. The land would remain under the ownership of EnergyCo following commencement of operation. The future use of acquired land that is not required for operational purposes would be subject to confirmation during detailed design, however, the ongoing operation of the energy hubs is not expected to permanently preclude future use of these areas for agricultural purposes (for example for grazing)."*

E144 Travelling stock reserve interactions

Details left for later design, delivery or operation | EIS; 12.4.5 Crown land and Lake Glenbawn; printed p505; PDF p540

> *"The operational footprint of the project (the area permanently occupied by project infrastructure and not including the broader transmission line easement) would affect around 11 hectares of Crown land (indicative only, based on the reference design). This includes around one hectare of land designated as TSRs due to permanent infrastructure. Land within the transmission line easement can continue to be utilised for existing purposes with some restrictions (refer to Section 12.4.2). Engagement with Local Land Services would continue to be undertaken during detailed design regarding interactions with TSRs."*

E145 Final property requirements and consultation

Details left for later design, delivery or operation | EIS; 12.6 Mitigation and management; printed p507; PDF p542

> *"The design will continue to be refined in consultation with landholders to minimise potential impacts on existing land use and properties as far as practicable."*

E145 additional reference: Appendix F repeat: LP1, printed p52, PDF p305.

E146 Property management agreements and arrangements

Details left for later design, delivery or operation | EIS; 12.6 Mitigation and management; printed p507–508; PDF p542–543

> *"Property Specific Management Plans (PSMPs) (as relevant) will be developed for directly impacted properties in consultation with the landholder. The PSMPs will include: … • the process for rehabilitation and stabilisation of disturbed areas following completion of construction … • measures to minimise disruption to agricultural or other practices during construction, including identification of: – existing grazing and cropping activities and farm infrastructure arrangements (for example fences, access tracks) within the project area – any required adjustments to existing agricultural activities during construction, including adjustments to fencing or access tracks or adjustments to grazing or cropping activities as a result of the location of permanent infrastructure within agricultural land. This would be informed by ongoing consultation with landholders – noise intensive activities during construction that would overlap with sensitive periods of the livestock production cycle (for example lambing or calving) – vehicle movements and other construction activities in the vicinity of livestock – the need for the movement of livestock away from potential stressors created during construction activities. …"*

E146 additional reference: Appendix F repeat: LP2, printed p52–54, PDF p305–307.

E147 Utility adjustments and protection measures

Details left for later design, delivery or operation | EIS; 12.6 Mitigation and management; printed p508; PDF p543

> *"The location of all services and utilities within the project area will be confirmed during detailed design, and any required protection or relocation works will be designed in consultation with utility providers and landholders."*

E147 additional reference: Appendix F repeat: LP3, printed p54, PDF p307.

13 | Agriculture and soils

E148 Kitchwin Hills works and property protections

Details left for later design, delivery or operation | EIS; 13.3.4.2 Impacts to Equine Critical Industry Cluster and equine facilities; printed p532; PDF p567

> *"Of the assessed receptors, Kitchwin Hills, a thoroughbred breeding stud within the Upper Hunter equine CIC, was identified as having the greatest potential to experience project-related impacts due to the location of the transmission corridor and associated access tracks within and adjacent to the property and the resulting interaction with construction activities. Detailed design and construction planning for works affecting Kitchwin Hills would be undertaken in consultation with the landholder to minimise impacts on equine operations where practicable. Any direct impacts to land or property interests resulting from project works on the property would be addressed in accordance with the applicable land access, acquisition and compensation framework for the project. The principal construction interactions are expected to be associated with construction traffic on Waverley Road, nearby access track works and construction activities occurring closest to the equine operation. Consultation and property-specific management measures would be implemented to reduce risks during sensitive periods, including breeding and foaling activities."*

E149 Property access and alternative arrangements

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p541; PDF p576

> *"Where possible, the location of any additional access tracks (temporary and permanent) will be confirmed in consultation with landholders to minimise impacts on agricultural activities. Where new permanent tracks are required, a single access track will be designed to serve both temporary and permanent purposes, where possible."*

E149 additional reference: Appendix F repeat: AG1, printed p55, PDF p308.

E150 Structure locations and property consultation

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p541; PDF p576

> *"Where the positioning of transmission line structures and other associated permanent structures will impact: • cropping land • areas used for set up and pack up of agricultural equipment, entry points and turning areas • farm dams • locations of high biosecurity risk, consultation will be undertaken with the affected landholder to identify opportunities to avoid or minimise these impacts, where practicable, prior to the commencement of relevant works which will impact the applicable area, equipment and/or property infrastructure."*

E150 additional reference: Appendix F repeat: AG2, printed p55, PDF p308.

E151 Farm specific property management plans

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p541–543; PDF p576–578

> *"Individual property management plans will be developed in consultation with each landholder directly affected by construction activities. The intent of the plans is to provide a flexible approach which balances the needs of existing agricultural operations and construction activities. The plans will address relevant matters including: • access arrangements and protocols • proposed timing and location of construction works, particularly where some restriction on vehicular, equipment, grazing or livestock movements will be necessary • grazing and cropping activities on and adjacent to the construction disturbance footprint during the construction period • farm infrastructure arrangements • any required adjustments to property infrastructure (fences, access tracks, etc) … Property management plans and property access plans will be developed prior to the commencement of relevant works which will impact the applicable property, activity, equipment and/or property infrastructure. The requirements of the plans will be adhered to and implemented throughout the construction period."*

E151 additional reference: Appendix F repeat: AG3, printed p55–57, PDF p308–310.

E152 Biosecurity plans and individual property controls

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p543–544; PDF p578–579

> *"Biosecurity controls will be implemented during construction to minimise the risk of the spread of disease, pests or weeds. These will be based on a general Biosecurity Management Plan for the project. … Construction activities will be assessed in relation to potential agricultural and biodiversity impacts (including weeds, pests, and emergency animal diseases such as Japanese encephalitis and foot and mouth disease) including a risk assessment outlining the likely plant, animal, and community risks. … The property-specific biosecurity management plans will address the various protocols and matters including the following: … For example, appropriate measures will be implemented with respect to foot and mouth disease to control any risk of introduction of the pathogen because of project activities • the property-specific controls applicable will be consistent with property biosecurity plans where they are in place. Agreed protocols will be documented in the biosecurity management plan …"*

E152 additional reference: Appendix F repeat: AG5, printed p57–58, PDF p310–311.

E153 Operational access routes and arrangements

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p545; PDF p580

> *"Fencing and access arrangements, such as locked gates and requirements for opening and closing of gates, will be determined in consultation with landholders. Any damage caused by maintenance activities will be repaired promptly."*

E153 additional reference: Appendix F repeat: AG9, printed p59, PDF p312.

E154 Equine facility verification and mitigation

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p546; PDF p581

> *"Prior to construction, the location and extent of equine facilities and paddocks associated with identified equine receptors will be verified through consultation with landholders, property managers and/or field verification. This information will be used to confirm receptor locations, refine construction management measures and inform notification and consultation requirements where construction activities may occur in proximity to equine facilities and paddocks."*

E154 additional reference: Appendix F repeat: EH1, printed p60, PDF p313.

E155 Equine property arrangements at The Barn

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p548; PDF p583

> *"An individual property management plan will be developed in consultation with each landholder affected by construction and operation activities. The purpose of the plan is to provide a flexible approach that balances the needs of the existing equine operation with construction and operation activities. The plan will address relevant matters including: • access arrangements and protocols • proposed timing and location of construction works • any required adjustments to property infrastructure (fences, access tracks, etc) • noise intensive activities during sensitive periods of the equine production cycle (for example, breeding and foaling) • movement of horses away from potential stressors created by construction activities • biosecurity requirements. • contact details for the person who will liaise with landholder to provide direct avenues of enquiry for information and issues management. The individual property management plan will be developed before the commencement of works that may affect the relevant property, activities, equipment or infrastructure. The requirements of the plan will be implemented and maintained throughout the construction and operation period."*

E155 additional reference: Appendix F repeat: EQ1, printed p62, PDF p315.

E156 Equine property arrangements at Kitchwin Hills

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p548; PDF p583

> *"Where construction activities are expected to have an impact on the equine operation, consultation will be undertaken with the affected landholder to identify opportunities to avoid or minimise these impacts, where practicable, prior to the commencement of relevant works which will impact the applicable area, equipment and/or property infrastructure."*

E156 additional reference: Appendix F repeat: EQ2, printed p62–63, PDF p315–316.

E157 Anthrax management and property plans

Details left for later design, delivery or operation | EIS; 13.7 Mitigation and management; printed p549–550; PDF p584–585

> *"An Anthrax Management Plan will be prepared as part of the Property Specific Management Plan (AG5). The plan will be prepared in consultation with relevant stakeholders and landholders and will include: • engagement with the construction workforce and affected landholders • livestock management measures during construction, such as exclusion fencing in areas of soil disturbance during construction and any water retention or erosion areas that could contain contaminated collected runoff water or sediments; including provisions for retention of fencing until ground cover is established • livestock vaccination program • dust suppression measures (in accordance with AQ1) • soil management, including measures to manage the movement of excavated or disturbed soil from the immediate construction site and prevent distribution to other locations of the project area • water runoff and erosion management (in accordance with SW1) • grazing management • construction management processes and protocols to: – avoid soil disturbance to known historic anthrax sites – reduce spore dispersal – reduce construction worker exposure to animals and contaminated soil ..."*

E157 additional reference: Appendix F repeat: AT1, printed p63–64, PDF p316–317.

14 | Traffic and transport

E158 Barry Road camp intersection treatment

Information promised for a Submissions or Amendment Report | EIS; 14.3.2 Intersections; printed p562; PDF p597

> *"Barry Road, Barry BAL and BAR may be required, subject to further assessment*"*

E158 note: Barry Road intersection row; the adjacent Camp 3 discussion and footnote on printed p563, PDF598 supplies the submissions and amendment stage.

E159 Camp 3 transport assessment and road treatment

Information promised for a Submissions or Amendment Report | EIS; 14.3.2 Intersections; printed p563; PDF p598

> *"* Camp 3 has been subject to limited assessment as part of the TTIA as its location was only recently identified. The TTIA notes a BAL and BAR treatment may be required and would need to comply with the performance outcomes assessed in the TTIA. This would be confirmed as part of further detailed assessment in an updated TTIA as part of the Submissions Report / Amendment Report."*

E160 Final intersection treatment details

Details left for later design, delivery or operation | EIS; 14.3.3 Over size over mass vehicles; printed p563; PDF p598

> *"The final detail of individual treatments would be confirmed as part of the detailed design, informed by detailed OSOM vehicle selection and consultation with TfNSW and the National Heavy Vehicle Regulator (NHVR)."*

E161 Road occupancy and public transport management

Details left for later design, delivery or operation | EIS; 14.3.7 Other impacts on transport network and services; printed p565; PDF p600

> *"Public transport Short duration temporary road closures are anticipated primarily for stringing of transmission lines at limited road locations and where there are new access points onto public roads. These types of works, including holding traffic for OSOM movements, would look to occur outside of school bus times to minimise impacts. Activities would be assessed on a case-by-case basis through the road occupancy approval process, with measures refined in consultation with stakeholders to minimise disruption."*

E162 National Trail construction access controls

Details left for later design, delivery or operation | EIS; 14.3.7 Other impacts on transport network and services; printed p566; PDF p601

> *"The construction of the project would not prevent the use of the National Trail however temporary access controls may apply at specific locations during critical construction periods. The precise nature and location of any interactions would be confirmed through detailed design, and consultation with the National Trail organisation would be undertaken to provide ongoing access along the route and to provide information about planned access management at these locations."*

E163 Property access protocols and work schedules

Details left for later design, delivery or operation | EIS; 14.3.7 Other impacts on transport network and services; printed p566; PDF p601

> *"Access to residential properties would be preserved throughout the construction phase. In certain limited instances, temporary restrictions on access to specific properties may be necessary, subject to prior consultation with the affected parties. It is anticipated that the impacts on property access would*

be minimal due to the rural context of the project; however, some properties along the proposed transmission line may experience temporary disruption. PSMPs will be developed for easement affected properties in consultation with the landholder and will outline the protocols that will be implemented to address landholder concerns during construction. Protocols will include a communication process that will be established with landholders, ensuring they are kept informed about the construction staging and work schedule and appropriate measures agreed."

E164 Emergency services construction communication strategy

Details left for later design, delivery or operation | EIS; 14.3.7 Other impacts on transport network and services; printed p566; PDF p601

"Access for emergency vehicles would be maintained throughout the construction phase. This includes ensuring that emergency vehicles can navigate through the construction zones without obstruction. Temporary restrictions on access may be implemented in limited circumstances, however, these would only occur following prior consultation with relevant emergency services to minimise disruption. Nevertheless, in the event of temporary disruptions, a robust communication strategy would be established to keep emergency services informed about construction schedules and staging, ensuring they can effectively respond to any emergencies during construction."

E165 Emergency services operational communication strategy

Details left for later design, delivery or operation | EIS; 14.4 Potential impacts – operation; printed p569; PDF p604

"Access for emergency vehicles would be maintained throughout the operational phase. This includes ensuring that emergency vehicles can navigate without obstruction. Temporary restrictions on access may be implemented in limited circumstances; however, these would only occur following prior consultation with relevant emergency services to minimise disruption. Nevertheless, in the event of temporary disruptions, a robust communication strategy would be established to keep emergency services informed about maintenance schedules ensuring they can effectively respond to any emergencies during maintenance activities."

E166 Traffic plan final routes access timing and controls

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p570; PDF p605

"A Traffic and Transport Management Plan (TTMP) will be prepared and will include: • confirmation of haulage routes • access to the project area, including entry and exit locations • preferred times of transport to and from the project area to minimise impacts on the road network • measures to minimise the number of workers using private vehicles • management of OSOM vehicles • site-specific traffic control measures (including signage) to manage and regulate traffic movement • relevant traffic safety measures, including driver induction, training, safety measures and protocols • requirements for, and placement of, traffic barriers • requirements and methods to consult and inform the local community of impacts on the local road network due to the development-related activities • consultation with TfNSW, National Heavy Vehicle Regulator (NHVR) and local council on the traffic management plans • consultation with the emergency services to ensure that procedures are in place to maintain safe, priority access for emergency vehicles • a response plan for any construction-related traffic incident • monitoring, review and amendment mechanisms • individual traffic management requirements at each stage of construction."

E166 additional reference: Appendix F repeat: TT1, printed p64–65, PDF p317–318.

E167 Heavy vehicle delivery scheduling

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p571; PDF p606

"Heavy vehicle movements to and from the project area will be scheduled to minimise traffic disruption to the surrounding road network. This may include, but is not limited to: • scheduling the movement of

construction material, equipment and waste to occur outside of peak periods where practical • scheduling heavy vehicle deliveries to be evenly dispersed as far as practical to minimise convoying or platoons and queuing outside the project area or on the road network."

E167 additional reference: Appendix F repeat: TT4, printed p65–66, PDF p318–319.

E168 Final OSOM routes configurations and schedules

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p571–572; PDF p606–607

"The TTMP will govern OSOM vehicle movements including: • identification of the final OSOM route • measures to provide an escort for the loads • times of transporting to minimise impacts on the road network • location of rest areas and required rest stops along the route • the maximum parameters of the materials to be transported to and from the project area • communication strategy and liaising with emergency services and police • any minor temporary civil infrastructure work (vegetation trimming, relocation of roadside assets (for example signs or barriers) and minor intersection modifications) which may be required to accommodate OSOM movements • safety measures to directly address OSOM vehicles passing through towns and include a 48-hour minimum public notification protocol of the presence of OSOM vehicles • consultation with the relevant Council on the TTMP and proposed OSOM movements prior to the commencement of works."

E168 additional reference: Appendix F repeat: TT5, printed p66, PDF p319.

E169 Driver Code of Conduct and route controls

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p572–573; PDF p607–608

"A Driver Code of Conduct will be prepared as part of the TTMP and will be used to outline the rules and behaviours which drivers associated with the project will be required to adhere to. The Driver Code of Conduct will outline arrangements for light and heavy vehicle drivers, including: • general requirements, including site induction requirements • travelling speeds and safe driving practices, particularly through residential areas and school zones • fatigue management • adherence to designated haulage routes and heavy vehicle noise • public complaint resolution and penalties and disciplinary action."

E169 additional reference: Appendix F repeat: TT9, printed p67, PDF p320.

E170 Access point design and traffic controls

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p574; PDF p609

"Access points will be treated based on their function, duration of use and traffic demand. Permanent and frequently used access points (for example energy hubs, compounds and high-use construction access locations) will be designed in accordance with Austroads and TfNSW guidance, including provision of appropriate turn treatments and compliance with Safe Intersection Sight Distance (SISD). Temporary or low-use access points where traffic volumes are limited or usage is short-term, including select existing constrained locations that are non-compliant, will be managed through site-specific traffic control measures (for example Traffic Control Plans, signage, speed management and spotters), rather than full geometric upgrades. Traffic control will be applied where it is sufficient to safely manage vehicle movements without the need for permanent or semi-permanent infrastructure upgrades."

E170 additional reference: Appendix F repeat: TT19, printed p69, PDF p322.

E171 School bus conflict and access management

Details left for later design, delivery or operation | EIS; 14.6 Mitigation and management; printed p575; PDF p610

> *"Consultation will be undertaken with school bus operators to identify routes, stops and timetables. Construction activities (including OSOM movements and traffic control) will be scheduled to minimise interaction during school peak periods."*

E171 additional reference: Appendix F repeat: TT23, printed p70, PDF p323.

15 | Economic

E172 Local industry participation plan

Details left for later design, delivery or operation | EIS; 15.4 Mitigation and management; printed p584; PDF p619

> *"A Local Workforce Development Plan, Local Industry Participation Plan and an Australian Industry Participation Plan will be developed for the project to promote local worker participation. These plans will identify opportunities to develop skills required for the project within the regional labour force."*

E172 additional reference: Appendix F repeat: EC1, printed p70, PDF p323.

16 | Noise and vibration

E173 Final camp positions and noise impacts

Details left for later design, delivery or operation | EIS; 16.3.1 Construction ancillary sites and maintenance facility; printed p602; PDF p637

> *"The specific camp locations are subject to change in the detailed design phase of the project, with this assessment assuming that noise sources considered within the workforce accommodation camp area are located at the closest extent of the project area to each receiver location. Therefore, the results shown in Table 16.7 and Table 16.8 are considered conservative and not all receivers are likely to experience the worst-case construction noise impacts presented. In detailed design, considered placement of camps within the project area would minimise potential noise impacts. It is expected that the camps would be located further from sensitive receivers than the current conservative assumptions which place them generally near the edge of the project area. … The threshold distances presented in Table 16.9and Table 16.10 for Camp 3 are also considered applicable to the Camp 1 Alternate workforce accommodation camp and construction ancillary site and may be used to indicate the approximate distances at which residential receivers could experience standard construction hours and out-of-hours NML exceedances."*

E173 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E174 Camp 3 noise assessment in later reports

Information promised for a Submissions or Amendment Report | EIS; 16.3.1 Construction ancillary sites and maintenance facility; printed p602; PDF p637

> *"As discussed in Section 3, the location of workforce accommodation Camp 3 was identified after completion of the majority of technical studies prepared for the EIS, therefore has not been assessed in*

detail as part of the NVIA. Detailed assessment of the proposed location for Camp 3 will be undertaken as part of the Submissions Report / Amendment Report. Based on preliminary analysis undertaken in the NVIA, the offset distance from the final camp location at which residential receivers are expected to exceed the standard construction hours and nighttime OOH NMLs are show in Table 16.9 and Table 16.10 respectively."

E175 Final line placement and vibration separation

Details left for later design, delivery or operation | EIS; 16.3.7.1 Residential receivers; printed p614; PDF p649

"Depending on the final location of the transmission line, which will be determined during detailed design, the separation distance from vibration intensive equipment to receivers may be increased which would also likely reduce the number of impacted receivers."

E176 Timor Caves locations and vibration sensitivity

Unresolved details with no stated completion stage | EIS; 16.3.7.2 Historical heritage; printed p615; PDF p650

"The project involves localised widening of Sargeants Gap Road in the heritage listed Timor Caves geological area. The exact location of the caves, depth of cover to the proposed road widening, geotechnical condition of the caves and presence of potentially vibration sensitive karst formation such as helictites is not known at this stage. Works proposed on Sargeants Gap Road are expected to include localised widening of sections of existing unsealed road. These works typically require an excavator, grader, water carts and vibratory rollers operating in either static or vibratory mode for material compaction along with heavy vehicle movements to deliver road base and remove excavated material. If vibratory construction equipment is required, the location of the works and proximity to the caves (entrance and extents) would be confirmed to understand separation distance from the construction works. ..."

E177 Operational noise reassessed through detailed design

Details left for later design, delivery or operation | EIS; 16.4.1 Transmission line; printed p623; PDF p658

"It should be noted that this assessment is based on the horizontal distance between the project area and sensitive receivers and does not consider intervening terrain and sound propagation factors that are expected to reduce the noise levels. Further to this, distances have been calculated from the edge of the 250 metre project area, whereas distances from the edge of the final easements (140 metres for dual 500 kV lines, 70 metres for the single 500 kV line and 120 metres for the dual 330 kV lines) would be greater (that is,. at least 30–35 metres inside the project area). Hence the significance of the impacts should be regarded as indicative and is expected to be reduced when further detailed design of the project is undertaken."

E177 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E178 Hub noise barriers layout and equipment

Details left for later design, delivery or operation | EIS; 16.4.2 Energy hubs; printed p623; PDF p658

"To reduce noise levels at the potentially impacted receivers, indicative 4 metre high noise barriers were incorporated into the noise model adjacent to the transformers at Central Hub A and the harmonic filters at North Hub. In this scenario, operational noise from both energy hubs was predicted to be below the PNTLs at all residential receivers during the most stringent night-time period under enhancing meteorological conditions. It is expected that noise from energy hubs could be mitigated through refinements during further detailed design including layout and positioning, the selection of equipment with lower sound power levels and/or increased barrier length and height. It is also noted that the modelled sound power levels represent the maximum potential levels for all equipment and would be reviewed as further detailed design is finalised."

E179 Nemingha noise mitigation

Details left for later design, delivery or operation | EIS; 16.4.3 Nemingha maintenance facility; printed p624; PDF p659

> *"The above assessment shows that one residential receiver closest to maintenance facility is predicted to exceed the PNTLs during daytime operation by up to 1 dB. It is expected that this exceedance could be mitigated through common refinements during further detailed design including layout and positioning, and inclusion of noise barriers where reasonable and feasible."*

E180 Noise Vibration and Blast Management Plan

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p625; PDF p660

> *"A Noise, Vibration and Blast Management Plan (NVBMP) would be prepared to provide the framework and mechanisms for the management and mitigation of all potential noise and vibration construction impacts from the project. The NVBMP will include:"*

E181 Fixed site noise mitigation during design

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p626; PDF p661

> *"Noise path control, such as hoarding or earth bunds, will be investigated and implemented where practicable and required. Positioning of site structures will be considered to act as barriers between noisy work and receivers where practical."*

E181 additional reference: Appendix F repeat: NV1, printed p71, PDF p324.

E182 Out of hours work protocol

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p626; PDF p661

> *"An out of hours (OOH) work protocol that details how the project will identify, assess and approve out of hours work outside standard construction hours will be developed and implemented. The protocol will include provisions to: • carry out additional assessments for work proposed outside standard construction hours, to confirm noise levels at potentially affected sensitive receivers and determine suitable mitigation measures to minimise noise levels • notify and engage with potentially noise affected receivers about upcoming work outside standard construction hours and address any associated complaints • identify appropriate respite for noise affected receivers (where required)."*

E182 additional reference: Appendix F repeat: NV2, printed p71, PDF p324.

E183 Vibration sensitive receivers and controls

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p628–629; PDF p663–664

> *"Where vibration intensive work is required within the recommended minimum working distances and is considered likely to exceed the cosmetic damage criteria: • different construction methods with lower source vibration levels will be investigated and implemented, where feasible • confirm any vibration-sensitive heritage structures that could potentially be impacted by the proposed works including confirming the structural integrity of the structure and applying appropriate vibration criteria • vibration monitoring will be undertaken at the start of work to determine actual vibration levels at the receiver • work will be ceased if the monitoring indicates vibration levels are likely to, or do, exceed the relevant criteria • potential direct and indirect impacts to all identified Aboriginal objects and sites of high significance in the vicinity of vibration intensive work will be reviewed and subject to avoidance and mitigation measures described in the Aboriginal Cultural Heritage Management Plan."*

E183 additional reference: Appendix F repeat: NV6, printed p74, PDF p327.

E184 Blast management locations and methods

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p629; PDF p664

> *"If blasting is required, a Blast Management Plan will be developed to minimise the potential for impacts. Maximum Instantaneous Charge (MIC) calculations will be undertaken for specific sites where blasting is required. Individual blast designs will be based on meeting the relevant criteria. All blasts, including initial trial blasts will be monitored to obtain data which can be used to confirm site constants and compliance with blasting criteria. Landholder notification and consultation requirements will be identified in the Blast Management Plan."*

E184 additional reference: Appendix F repeat: NV7, printed p74, PDF p327.

E185 Transmission line noise review and contingent remedies

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p630; PDF p665

> *"Operational transmission line noise impacts will be reviewed during detailed design, once the transmission line placement, conductor arrangement and any property acquisitions are known. For each residence where potential operational noise levels are predicted to exceed the PNTL, noise monitoring to confirm actual operational noise levels will be carried out at representative locations following commencement of project operation. The noise monitoring will occur during representative L50 (median occurrence) weather/atmospheric conditions conducive to generating noise from corona discharge. For residences where the monitoring identifies corona discharge levels above PNTLs, consultation will be undertaken with the landholder of the affected residence to identify reasonable and feasible mitigation measures. Once the appropriate measures have been agreed with the landholder, these will be implemented as soon as reasonably practical."*

E185 additional reference: Appendix F repeat: NV9, printed p75–76, PDF p328–329.

E186 Hub noise layout equipment and barriers

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p631; PDF p666

> *"Operational noise impacts from the energy hubs will be reviewed during detailed design. The design will consider the following measures with a view to minimising noise impacts: • selection of equipment with consideration of operating sound power levels where feasible • incorporation of transformer, synchronous condenser, harmonic filters and reactor barriers where reasonable and feasible."*

E186 additional reference: Appendix F repeat: NV10, printed p76, PDF p329.

E187 Maintenance facility noise design

Details left for later design, delivery or operation | EIS; 16.6 Mitigation and management; printed p631; PDF p666

> *"Operational noise impacts from the maintenance facility will be reviewed during detailed design. The design will consider the following measures with a view to minimising noise impacts: • maximise the offset distance between noisy plant and sensitive receivers by unloading/loading equipment and performing maintenance works away from sensitive receivers • positioning of site structures such as offices, will be considered to act as barriers between noisy work areas and receivers where practical • noisy activities would be conducted within enclosed workshop areas where reasonable and feasible • installation of noise barriers where reasonable and feasible."*

E187 additional reference: Appendix F repeat: NV11, printed p76, PDF p329.

17 | Hazards and risks

E188 Dangerous goods types and quantities

Details left for later design, delivery or operation | EIS; 17.1.3 Potential impacts – operation; printed p635; PDF p670

> *"The exact nature and quantities of dangerous goods to be stored at the hubs, Bayswater Power Station substation extension and the Nemingha maintenance facility during operation of the project would be further developed as part of detailed design. Therefore, for assessment purposes conservative estimates were used in applying the Hazardous and Offensive Development Guideline screening thresholds."*

E189 Updated gas pipeline risk assessment

Details left for later design, delivery or operation | EIS; 17.1.3 Potential impacts – operation; printed p636; PDF p671

> *"During operation, transmission infrastructure has the potential to interact with the Queensland Hunter Gas Pipeline, including electromagnetic and electrical interference effects associated with transmission lines. Potential impacts were assessed in Technical Report 10 and Technical Report 13, with the key findings summarised as part of the cumulative impact assessment in Section 24. Consistent with these findings, an updated risk assessment will be completed for the gas pipeline as part of the detailed design process. The final design will include mitigation measures as required to mitigate any identified hazards (refer to Table 17.1)."*

E190 Hazardous chemical controls and emergency planning

Details left for later design, delivery or operation | EIS; 17.1.5 Management and mitigation measures; printed p637; PDF p672

> *"All hazardous chemicals will be stored and handled in line with the NSW Code of Practice: Managing risks of hazardous chemicals in the workplace, Part 7.1 of the NSW Work Health and Safety Regulation 2025, and the relevant Australian Standards, including but not limited to: • AS 1940:2017 The storage and handling of flammable and combustible liquids • AS 3780:2023 The storage and handling of corrosive substances • AS 4332-2004 The storage and handling of gases in cylinders • AS 4452:2025 The storage and handling of toxic substances • AS/NZS 4681:2000 The storage and handling of Class 9 (miscellaneous) dangerous goods and articles • AS/NZS 3833:2024 The storage and handling of mixed classes of dangerous goods • AS 2067:2016 Substations and high voltage installations exceeding 1 kV alternating current If required by the NSW WHS Regulation 2025, an Emergency Plan (EP) will be developed for the construction and operation phases. All personnel required to handle hazardous chemicals will be appropriately trained in their safe use and handling."*

E190 additional reference: Appendix F repeat: HR1, printed p77–78, PDF p330–331.

E191 Updated gas pipeline electrical risk assessment

Details left for later design, delivery or operation | EIS; 17.1.5 Management and mitigation measures; printed p639; PDF p674

> *"An updated risk assessment will be completed for the gas pipeline as part of the detailed design process in accordance with AS 4853 – Electrical Hazards on Metallic Gas Pipelines. The final design will include mitigation measures as required to mitigate any identified hazards."*

E191 additional reference: Appendix F repeat: HR5, printed p79, PDF p332.

E192 Uncertified Aerodrome Management Plans

Details left for later design, delivery or operation | EIS; 17.2.4.2 Uncertified aerodromes; printed p649; PDF p684

> *"For non-easement-affected properties, where an uncertified aerodrome is impacted to a major or moderate degree, an Uncertified Aerodrome Management Plan would be prepared in consultation with the owner to determine the approach to mitigation and management actions to address the impacts on a case by case basis. This may include measures such as relocation or realignment of the aerodrome, support for alternative aerial application arrangements, or alternative measures agreed with the landholders."*

E193 Aerodrome management plans and aerial operations

Details left for later design, delivery or operation | EIS; 17.2.6 Management and mitigation measures; printed p652; PDF p687

> *"At locations where the transmission lines will impact existing aerial application operations, consultation will be undertaken with relevant landholders and or operators to identify appropriate mitigation arrangements such as the installation of aerial warning markers on the transmission lines (where feasible). Where the project will result in majorly and moderately affected uncertified aerodromes, EnergyCo will consult with the owners and operators regarding mitigation. This may include relocation or realignment of the aerodrome, support for alternative aerial application arrangements, or alternative measures agreed with the owners. For easement-affected properties the major or moderate impacts on uncertified aerodromes will be considered as part of the easement acquisition and compensation process and addressed in a Property Specific Management Plan for individual properties. For non-easement-affected properties where an uncertified aerodrome is impacted to a major or moderate degree, there will be an Uncertified Aerodrome Management Plan prepared in consultation with the owner to determine the approach to mitigation and management actions to address the impacts on a case by case basis."*

E193 additional reference: Appendix F repeat: AV1, printed p79–80, PDF p332–333.

E194 Final access tracks and public road upgrades

Details left for later design, delivery or operation | EIS; 17.3.4.1 Operational bushfire risks from the project; printed p661; PDF p696

> *"The project would provide additional access tracks (for accessing transmission towers and easements) and some upgrading of existing public roads to provide improved access for construction. The final location and nature of new access tracks and public upgrade works would be determined at the detailed design stage in consultation with landholders. These works would improve access in the area surrounding the project, and would have benefits for improved response time and emergency egress."*

E195 Bushfire prevention and emergency response details

Details left for later design, delivery or operation | EIS; 17.3.7 Management and mitigation measures; printed p668; PDF p703

> *"Prior to commencement of the construction phase, develop and implement a Project Bush Fire Prevention Plan (alternatively, a section in the Construction Environmental Management Plan specifying bushfire prevention measures for all identified potential fire ignition sources) detailing the operational restrictions and procedures for preventing accidental fire ignition during construction, and detailing contingency arrangements for project work crews to extinguish any accidental fire ignitions at-source while they are able to be controlled with portable extinguishers and on-site equipment. In particular the project Bush Fire Prevention Plan will need to address: • establishment of a project 'hot works' management system for implementation during the project • smoking prohibition and designated smoking area protocol for project construction stage • fire-safe work procedure for earthmoving and drilling works … Annual pre fire season audits of construction contractors will be conducted to assess the implementation of fire prevention, preparedness and response-readiness measures."*

E195 additional reference: Appendix F repeat: BF3, printed p82–83, PDF p335–336.

E196 Camp bushfire emergency plans

Details left for later design, delivery or operation | EIS; 17.3.7 Management and mitigation measures; printed p670; PDF p705

> *"Workforce accommodation camps will have APZ achieving SFPP APZ compliance: Camps 1, 2, 4, and 5. Camp 3 site will be selected and designed to achieve SFPP APZ compliance. APZ maintenance should comply with standard APZ specifications as per Appendix 4 of PBP. An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for each project accommodation workers camp location. All temporary worker accommodation structures will incorporate ember protection measures as per the requirements of AS3959:2018 Sections 3 and 5. Property access roads from the public road network into construction support sites containing temporary worker accommodations will comply with the requirements of PBP Table 5.3b (Property Access). Construction ancillary sites with temporary worker accommodation will have a static water supply (tank) provided compliant with PBP Table 5.3d (20,000 litres)."*

E196 additional reference: Appendix F repeat: BF5, printed p84–85, PDF p337–338.

E197 Site office bushfire emergency plans

Details left for later design, delivery or operation | EIS; 17.3.7 Management and mitigation measures; printed p670–671; PDF p705–706

> *"An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for each project site office. All temporary project site office structures will incorporate ember protection measures as per the requirements of AS3959:2018 Sections 3 and 5. Property access tracks from the public road network into construction ancillary sites with offices will comply with the requirements of PBP Table 5.3b (Property Access). APZs achieving BAL 12.5 will be provided for site offices and amenities buildings located within laydown areas. APZ maintenance should comply with standard APZ specifications as per Appendix 4 of PBP."*

E197 additional reference: Appendix F repeat: BF6, printed p85, PDF p338.

E198 Operational bushfire emergency plans

Details left for later design, delivery or operation | EIS; 17.3.7 Management and mitigation measures; printed p672; PDF p707

> *"An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for the offices and workshops. APZs achieving BAL 29 will be provided for the energy hubs, Nemingha maintenance facility and the Bayswater substation extension. These will comply with standard APZ specifications as per Appendix 4 of PBP."*

E198 additional reference: Appendix F repeat: BF9, printed p87, PDF p340.

E199 EMF design review and exposure controls

Details left for later design, delivery or operation | EIS; 17.4.6 Management and mitigation measures; printed p679; PDF p714

> *"The detailed design for the transmission lines and energy hubs will be developed to comply with the following criteria: • Magnetic fields: 2,000 milligauss being the ICNIRP guideline 'Reference Level' at the substation perimeter fence, and 1,000 milligauss being the adopted project field limits for transmission lines • Electric fields: 9.1 kV per metre, directly below line and 5 kV per metre at easement boundary, ensuring compliance with the ICNIRP guideline 'Basic Restriction'."*

E199 additional reference: Appendix F repeat: EM1, printed p87–88, PDF p340–341.

E200 Microwave link assessment and mitigation

Details left for later design, delivery or operation | EIS; 17.5.4 Mitigation and management; printed p681; PDF p716

> *"Consultation will be undertaken with the NSW Telco Authority regarding the 7.5 GHz link between Turkey Mountain and Uralla to identify appropriate mitigation arrangements, where required. These may include tower micro-siting and/or upgrading existing telecommunications equipment (where feasible)."*

E200 additional reference: Appendix F repeat: EM3, printed p88, PDF p341.

E201 Public safety microwave link interference

Details left for later design, delivery or operation | EIS; 17.5.3.4 Microwave point to point public safety network; printed p681; PDF p716

> *"One NSW Telco Authority 7.5 GHz link between Turkey Mountain and Uralla was identified as having a high risk of impact due to limited horizontal and vertical clearance from a proposed transmission tower. Further assessment would be conducted during detailed design, in coordination with the NSW Telco Authority and it is expected that this impact can be mitigated by micro-siting of the tower and/or upgrading existing telecommunications equipment."*

18 | Surface water and flooding

E202 Sensitive watercourse protection through design

Details left for later design, delivery or operation | EIS; 18.3.2 Watercourses and riparian corridors; printed p691; PDF p726

> *"The sensitivity of affected watercourses varies depending on their geomorphic condition and recovery potential. River Styles classifications indicate that watercourses intersected by the project range from good to poor condition and exhibit variable recovery potential. Watercourses with moderate to low recovery potential are generally more sensitive to disturbance and may require additional consideration during detailed design and construction planning. Disturbance of channel beds and banks has the potential to affect local geomorphic function, increase erosion risk and influence channel stability if not appropriately managed."*

E203 Site layout and flood prone land

Details left for later design, delivery or operation | EIS; 18.3.4 Flooding; printed p692; PDF p727

> *"Impacts on flood behaviour are expected to be minor, temporary and localised, with no material off-site impacts anticipated. Site layout and detailed design would avoid or minimise encroachment into drainage features and flood-prone land where practicable."*

E204 Water sourcing and increased drought demand

Details left for later design, delivery or operation | EIS; 18.3.6.3 Exposure to climate variability; printed p699; PDF p734

> *"As noted previously, water sourcing arrangements for the project would be confirmed during detailed design. To minimise pressure on regional water resources, the proposed water sourcing strategy prioritises harvestable rights water, followed by available licensed water sources and, where appropriate, potable supplies from local councils or other suppliers. The potential for increased water demand during prolonged dry periods, particularly for dust suppression activities, would be considered during detailed design and construction planning."*

E204 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p18.

E205 Wastewater treatment capacity and discharge design

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p704; PDF p739

> *"Design and implement wastewater collection and treatment systems, where required, that are appropriately sized for the project infrastructure. Where possible collect and treat wastewater from site offices for re-use on site to fulfil non-potable construction and operational water demands. The specifics of on-site wastewater management systems, including design and capacity, would be determined in the detailed design phase, and will comply with ANZG Volume 3: Primary industries—Rationale and background information, Chapter 4: Irrigation water quality (ANZG, 2018) and the requirements of the Public Health Act 2010."*

E205 additional reference: Appendix F repeat: SW7, printed p90, PDF p343.
E205 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p23.

E206 Water supply sources quantities and strategy

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p704–705; PDF p739–740

> *"EnergyCo will develop a detailed Water Supply Strategy as part of detailed design, ensuring that project water demands can be met while minimising impacts on existing water users and protecting water available for the environment. The strategy will include a hierarchical approach that prioritises minimising pressure on regional water resources and avoiding adverse impacts on existing entitlement holders. The strategy will be prepared in consultation with Councils and other relevant stakeholders."*

E206 additional reference: Appendix F repeat: SW8, printed p90, PDF p343.
E206 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p23.

E207 Flood freeboard and design protection

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p705; PDF p740

> *"Permanent infrastructure would be designed having regard to applicable flood immunity criteria for critical infrastructure. Where infrastructure is located within flood risk areas, flood-resilient design measures (for example elevation of finished floor levels, waterproofing, protective bunding, submersible equipment where appropriate) would be incorporated. Hub benches to be set at the 1% AEP plus 0.5 m freeboard where impacted by flooding. Where impacted by local drainage, a minimum of 300 mm freeboard should be adopted if the flood risk is considered low. Consideration of hydraulic loads, debris loads and impact of scour on structural stability of towers."*

E207 additional reference: Appendix F repeat: FL2, printed p91, PDF p344.

E208 Detailed flood mitigation design

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p705–706; PDF p740–741

> *"During construction, temporary works would be configured to avoid unnecessary obstruction of overland flow paths and drainage lines. The project would be designed to limit impacts on flooding to pre-development conditions outside of the project in the construction phase for events up to the 5% AEP and in the operational phase up to the 1% AEP event. Any unavoidable flood impacts would be mitigated through localised drainage upgrades, onsite detention, scour protection, flow path realignment or landform grading, as identified during detailed design."*

E208 additional reference: Appendix F repeat: FL3, printed p91–92, PDF p344–345.

E209 Detailed flooding impact assessment

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p706; PDF p741

> *"Detailed flood impact assessment is required at detailed design to confirm flood risk to critical project assets or where there is the potential to impact adjacent properties or public safety."*

E209 additional reference: Appendix F repeat: FL4, printed p92, PDF p345.
E209 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p25.

E210 Flood risks to operational access

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p706; PDF p741

> *"Flood risk to access routes should be reviewed during detailed design having regard to the proposed design, operational requirements and desired level of service. Where unacceptable risks are identified, appropriate design, maintenance or operational measures should be considered."*

E210 additional reference: Appendix F repeat: FL5, printed p92, PDF p345.
E210 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p25.

E211 Flood risks to emergency access and evacuation

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p706; PDF p741

> *"Emergency access and flood response requirements should be reviewed during detailed design and operational planning. Where flood risk is identified as a constraint to emergency access, appropriate emergency management measures should be developed in consultation with relevant stakeholders that is, SES and Council."*

E211 additional reference: Appendix F repeat: FL6, printed p92, PDF p345.
E211 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p25.

E212 Flood isolation assessment and controls

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p706; PDF p741

> *"The potential for flood-related isolation should be assessed during detailed design and operational planning. Where isolation risks are identified, appropriate access, shelter-in-place or operational management measures should be considered."*

E212 additional reference: Appendix F repeat: FL7, printed p92, PDF p345.
E212 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p25.

E213 Camp and ancillary site drainage and flooding controls

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p706; PDF p741

> *"Flood risk should be considered during site layout at detailed design stage. Where camps, laydowns or ancillary facilities are proposed within flood-prone areas, the need for setbacks, mitigation measures or operational controls should be assessed."*

E213 additional reference: Appendix F repeat: FL8, printed p93, PDF p346.
E213 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p25.

E214 Crossing scour and erosion protection design

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p707; PDF p742

> *"Waterway crossings identified as having elevated flood hazard, scour or erosion risk should be reviewed during detailed design to determine whether additional drainage, scour protection, maintenance provisions or operational controls are required having regard to the proposed design and intended level of service."*

E214 additional reference: Appendix F repeat: FL9, printed p93, PDF p346.
E214 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p26.

E215 Broader road network flood design review

Details left for later design, delivery or operation | EIS; 18.6 Mitigation and management; printed p707; PDF p742

> *"Where operational access is dependent on public roads located within flood-prone areas, the suitability of the access route should be reviewed during detailed design. Any identified flood-related access constraints should be considered in operational planning and emergency management procedures."*

E215 additional reference: Appendix F repeat: FL10, printed p93, PDF p346.
E215 additional reference: Same EIS passage in Section 18 - Surface water and flooding (PDF) (1).pdf, PDF p26.

19 Groundwater

E216 Groundwater quality and contamination management

Details left for later design, delivery or operation | EIS; 19.6 Management and mitigation measures; printed p718–719; PDF p753–754

> *"A Soil and Water Management Plan (SWMP) will be developed for the construction phase of the project, which will include: • erosion and sedimentation controls in areas of ground disturbance and upstream of waterways/waterbodies to manage run-off – use of sediment fences, berms, diversion drains and/or sediment traps, where required – prevent sediment laden run-off to discharge into waterways/waterbodies and other environmental sensitive areas such as karsts (along Sargeants Gap Road) and alluvial water sources (road upgrades along Kingdon Ponds, Isis River, Peel River, Macdonald River) … An Unexpected Contamination Finds Plan (UCFP) will be developed and appended to the SWMP, which will include measures to manage discovered/encountered contaminated groundwater during construction, which may be noted as visual/olfactory indicators (odour/colour). … Depending on the type and extent of contamination, may be remediated passively (that is, natural attenuation) or actively (that is, air sparging) depending on location, sensitivity of users and ecosystems."*

E216 additional reference: Appendix F repeat: GW1, printed p93–95, PDF p346–348.

E217 Dewatering volumes methods mitigation and disposal

Details left for later design, delivery or operation | EIS; 19.6 Management and mitigation measures; printed p720; PDF p755

> *"A Dewatering Management Plan (DMP) will be required as an appendix of the SWMP, specifically for ground disturbance works at hubs, where significant cuts are expected which will likely intersect groundwater. The DMP will consider the following measures: • estimate and present expected dewatering volumes, water production schedule and methods • present feasible dewatering mitigation measures to be implemented during construction for temporary and/or permanently drained cuts • testing of groundwater quality to inform disposal strategy • present groundwater disposal options,*

which may involve pump and treat, surface discharge, stream discharge, re-injection and/or off-site trucking depending on water quality objectives."

E217 note: The measure EIS passage in Section 19 - Groundwater (PDF).pdf, PDF p13. specifies controls and monitoring requirements, but the site-specific quantities, test results and resulting controls remain to be determined. Its table timing is construction, not an express pre-determination deadline.
E217 additional reference: Appendix F repeat: GW3, printed p95, PDF p348.
E217 additional reference: Same

E218 Sustainable pumping yields drawdown effects and remedial response

Details left for later design, delivery or operation | EIS; 19.6 Management and mitigation measures; printed p720–721; PDF p755–756

"A Groundwater Management Plan (GWMP) will be required as an appendix to the SWMP, specifically to monitor impacts of works extracting groundwater for construction purposes at specific locations. The GWMP will consider the following measures: • Monitoring (minimum of 12 months) of groundwater levels and quality at and downstream of Central Hub A transformer yard cut to monitor potential impacts of temporary dewatering and permanently drained cuts on baseflow to local streams and riparian terrestrial groundwater dependent ecosystems (GDEs). Should impacts be noted, provisions should be made to implement managed aquifer recharge in this area (such as a soakaway) to restore baseflow regime supplying local GDEs both during and following the construction phase. • Undertaking of pumping tests and baseline level and quality monitoring (minimum 12 months) at groundwater take sites to determine sustainable pumping yields and potential distance drawdown impacts to surrounding bore users and GDEs. …"

E218 note: The measure specifies controls and monitoring requirements, but the site-specific quantities, test results and resulting controls remain to be determined. Its table timing is construction, not an express pre-determination deadline.
E218 additional reference: Appendix F repeat: GW4, printed p95–96, PDF p348–349.

E219 Barry caves investigations and vibration thresholds

Details left for later design, delivery or operation | EIS; 19.6 Management and mitigation measures; printed p721; PDF p756

"Should the use of vibratory compaction equipment be required either along Sargeants Gap Road for localised widening works and north-west of the Barry caves northern extent, where access tracks and a minor segment of the transmission alignment intersect mapped and recognised limestone beds, the location of the works and proximity to caves features (including cave entrance and mapped extents) will be confirmed to understand separation distance from construction activities. Geotechnical and/or geophysical investigations will be required to confirm appropriate vibration thresholds and the tolerance of the karst system to vibration in the vicinity of the works to prevent potential structural damage."

E219 additional reference: Appendix F repeat: GW5, printed p96–97, PDF p349–350.

22 | Contamination

E220 Contamination investigations and management

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p755; PDF p790

"Potential human health and ecological risks from construction activities in areas external to AECs will be managed via implementation of a Soil and Water Management Plan (SWMP) and standard controls summarised in Section 25. Construction activities within the project area that intersect AECs identified as having a moderate or greater impact will be minimised during finalisation of the design and construction methodology and avoided or minimised where practicable during construction. Where disturbance works are unable to be avoided, AECs require further assessment prior to construction via

a targeted detailed site investigation. All investigations and remediation/validation (if required) will be undertaken in accordance with the assessment of site contamination under the 2013 National Environmental Protection Measures (NEPM) and Guidelines for Consultants Reporting on Contaminated Land (EPA, 2020b), and other relevant guidelines made or endorsed by the EPA."

E220 additional reference: Appendix F repeat: SC1, printed p102, PDF p355.

E221 Surface water assessment and discharge controls

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p755–756; PDF p790–791

"Potential risk to surface water quality from construction activities will be managed via the implementation of a Soil and Water Management Plan (SWMP) and standard controls summarised in Section 25. Construction activities within the project area that intersect surface water bodies will be minimised during detailed design and development of the construction methodology. Impacts will be minimised where practicable during construction. Where disturbance works impacting a surface water body cannot be avoided, water will be assessed against relevant discharge or disposal criteria prior to dewatering, disturbance or extraction activities, with any required approvals obtained. All investigation and management measures will be undertaken in accordance with the NEPM, Australia and New Zealand Guidelines (ANZG) for freshwater quality (ANZECC, 2018) and other relevant guidelines made or endorsed by the EPA."

E221 additional reference: Appendix F repeat: SC2, printed p102–103, PDF p355–356.

E222 Contaminated groundwater investigation and treatment

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p756; PDF p791

"A Groundwater Management Plan (GWMP) will be required as an appendix to the SWMP, specifically to monitor impacts of works extracting groundwater for construction purposes at specific locations. Where disposal or discharge of extracted groundwater is required further sampling and analysis of groundwater is required for comparison against the relevant criteria for the disposal pathway. This will include ANZG freshwater quality guidelines (ANZECC, 2018) for discharge to surface water, trade waste or sewer acceptance criteria in accordance with operator requirements, and / or requirements of the receiving treatment facility in line with licence conditions. The project may need to gain approval under the POEO Act 1997 prior to discharge or disposal. Where extraction of groundwater is proposed in areas not likely to have been impacted by AECs, management of groundwater will be managed via implementation of standard controls discussed in Section 25 of the EIS. …"

E222 additional reference: Appendix F repeat: SC3, printed p103, PDF p356.

E223 Salinity investigations and management

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p757; PDF p792

"Disturbance works within the project area intersecting areas mapped as moderate or higher risk of saline soils would require a visual inspection for the presence of saline soils. Areas of known or suspected salinity would be subject to further testing as required. If salinity is confirmed, excavated soils will be managed in accordance with Book 4 Dryland Salinity: Productive use of Saline Land and Water (DECC, 2008a) and the Salinity Training Manual (DPI, 2014). This will be captured within the SWMP to manage salinity impacts. Erosion controls will be implemented in accordance with The Blue Book (Landcom, 2004) in the ESCP. Prior to construction, materials will be selected to withstand acidic or high saline soil and groundwater environment (where applicable). During construction, existing areas of waterlogging and poor drainage will be avoided, where practicable, regarding access tracks and permanent structures."

E223 additional reference: Appendix F repeat: SC4, printed p104, PDF p357.

E224 Naturally occurring asbestos strategy

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p758; PDF p793

> *"Construction activities within the project area that intersect NOA will be minimised during finalisation of the design and construction methodology and avoided or minimised where practicable during construction. Where disturbance works are unable to avoid relevant areas comprising NOA further assessment is required prior to construction via a targeted sampling program. All investigations will be undertaken in accordance with the assessment of site contamination NEPM and other relevant guidelines made or endorsed by the EPA. Investigation should be undertaken by suitably qualified personnel with asbestos / NOA experience. Once the extent of NOA is better understood and designs are refined, the SWMP will be updated to include management of NOA in accordance with the NSW Government Code of Practice How to manage and control asbestos in the workplace (Safe Work NSW, 2022). The SWMP will include the measures outlined to manage NOA as detailed in chapter 11 of the contamination assessment (Technical Report 19)."*

E224 additional reference: Appendix F repeat: SC6, printed p104–105, PDF p357–358.

E225 Unexpected contamination investigation protocol

Details left for later design, delivery or operation | EIS; 22.5 Management and mitigation; printed p759; PDF p794

> *"The discovery of any unexpected contamination during construction will be managed in accordance with an Unexpected Contaminated Finds Plan (UCFP) which will be prepared prior to construction and included in the SWMP."*

E225 additional reference: Appendix F repeat: SC9, printed p106, PDF p359.

23 | Waste management

E226 Waste facility agreements and revised waste projections

Details left for later design, delivery or operation | EIS; 23.2 Existing environment; printed p762; PDF p797

> *"EnergyCo has consulted with councils to determine the potential waste streams and waste capacity that council operated facilities may be able to accept, subject to appropriate agreements. This consultation will continue during detailed design as further refinements are made to projected waste volumes and types generated by the project."*

E226 additional reference: Same EIS passage in Section 23 - Waste (PDF).pdf, PDF p3.

E227 Final waste quantities and classifications

Details left for later design, delivery or operation | EIS; 23.3.1 Waste generation during construction; printed p765; PDF p800

> *"Construction waste generating activities and indicative quantities are outlined in Table 23.2. The estimates of construction waste streams and quantities have been calculated from the reference design and based on the construction methodology described in Section 3. Final waste quantities and classifications would be confirmed during the detailed design phase."*

E227 additional reference: Same EIS passage in Section 23 - Waste (PDF).pdf, PDF p6.

E228 Waste facility capacity licence and destination confirmation

Details left for later design, delivery or operation | EIS; 23.5 Mitigation and management; printed p773; PDF p808

"The recycling and disposal facilities to be used by the project during construction and operation will be determined based on availability/capacity, waste licensed to be accepted and confirmed waste classifications. Consultation will be carried out with waste management facility operators to identify landfill capacities and confirm suitable licensed waste management recycling and disposal locations for the project."

E228 additional reference: Appendix F repeat: WM2, printed p106, PDF p359.
E228 additional reference: Same EIS passage in Section 23 - Waste (PDF).pdf, PDF p14.

24 | Cumulative impacts

E229 Additional cumulative project assessments

Information promised for a Submissions or Amendment Report | EIS; 24.2.1 Identification of relevant future projects; printed p779; PDF p814

"Relevant future projects considered in the assessment are summarised in Table 24.3 and shown on Figure 24.1. During mid-September 2026, EIS's for 2 additional state significant projects commenced exhibition (Bowmans Creek Wind Farm Stage 2 (SSD-73123714) and Upper Hunter Battery Energy Storage System (SSD-61707209)). The exhibition periods for both of these projects commenced after the completion of the CIA assessments for the project. The consideration of these projects in the project - level CIA will be undertaken as part of the Submissions Report / Amendment Report."

E230 Gas pipeline hazards and final mitigation

Details left for later design, delivery or operation | EIS; 24.2.2.10 Hazards - preliminary risk screening; printed p802; PDF p837

"• During operation of the project, transmission infrastructure has the potential to interact with the Queensland Hunter Gas Pipeline, including EMF and electrical interference effects associated with transmission lines. EMF impacts are discussed in Section 24.2.2.13. An updated risk assessment will be completed for the gas pipeline as part of the detailed design process in accordance with AS 4853 – Electrical Hazards on Metallic Gas Pipelines. The final design will include mitigation measures as required to mitigate any identified hazards."

E230 additional reference: Same EIS passage in Section 24 - Cumulative impacts (PDF).pdf, PDF p28.

E231 Repeated commitment to pipeline risk assessment

Details left for later design, delivery or operation | EIS; 24.2.2.13 EMF; printed p804; PDF p839

"As discussed in Section 24.2.2.10, an updated risk assessment will be completed for the gas pipeline as part of the detailed design process."

E232 Plans to manage combined cumulative social impacts

Details left for later design, delivery or operation | EIS; 24.2.3.1 Combined impacts; printed p813; PDF p848

"Whilst the project has clear strategies to address its contribution to these issues, in a broader cumulative context, the combined cumulative social impacts highlight the need for coordinated workforce accommodation, infrastructure planning and ongoing engagement to manage cumulative social impacts across the New England REZ and avoid disproportionate effects on smaller communities. The proposed SIM Plan, CSEP, Local Industry Participation Plan, and Workforce Management Plan would be prepared and implemented for the project with the aim of managing combined cumulative impacts by facilitating ongoing engagement with local communities and outlining strategies to avoid over-concentration of workforce pressures in individual towns."

E233 Cumulative impact mitigation as impacts arise

Details left for later design, delivery or operation | EIS; 24.2.4 Management and mitigation; printed p815–816; PDF p850–851

> *"Consultation will be undertaken with construction contractors, proponents, councils, and affected landholders as required to coordinate construction staging and timing with the aim of minimising and managing potential cumulative impacts. This will include: • identifying the potential for cumulative impacts associated with concurrent construction programs (for example shared access routes, works, resources) • developing mitigation measures to mitigate cumulative impacts as they arise where practicable."*

E233 additional reference: Appendix F repeat: CI1, printed p107–108, PDF p360–361.
E233 additional reference: Same EIS passage in Section 24 - Cumulative impacts (PDF).pdf, PDF p42.

25 | Environmental management and mitigation measures

E234 Enabling Works Management Plan

Details left for later design, delivery or operation | EIS; 25.2.1 Enabling works; printed p820; PDF p855

> *"• Enabling Works Management Plan (or similar) to be prepared by the network operator specific to the enabling work being undertaken."*

E234 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E235 CEMP and accompanying strategies and procedures

Details left for later design, delivery or operation | EIS; 25.2.2 Construction environmental management plan; printed p820; PDF p855

> *"Construction activities are described in Section 3.3. Construction activities that would occur following pre-construction and enabling works would be managed in accordance with a CEMP and accompanying strategies and procedures to be prepared and implemented by the network operator."*

E235 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E236 CEMP retained as an internal management document

Details left for later design, delivery or operation | EIS; 25.2.2 Construction environmental management plan; printed p820; PDF p855

> *"The CEMP would be prepared and implemented with regard to the Environmental Management Plan Guideline for Infrastructure Projects (DPIE, 2020d) and Independent Audit Post Approval Requirements (DPHI, 2026e). The CEMP would be kept as an internal management document which would guide the use of the issue-specific environmental management plans, strategies and procedures provided in Section 25.4."*

E236 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E237 Criteria for choosing additional ancillary construction sites would be contained in the later CEMP

Details left for later design, delivery or operation | EIS; 25.2.2 Construction environmental management plan; printed p821; PDF p856

"location assessment protocol for additional construction ancillary sites that defines environmental, social and constructability criteria to guide site selection and minimise impacts, while maintaining flexibility for construction"

E237 note: This is a bullet in the list introduced by "The CEMP would likely include". It is a proposed selection protocol, not authority to disregard the approved project area or conditions. Main p820 says the CEMP is an internal management document.

E238 Contractor environmental work methods

Details left for later design, delivery or operation | EIS; 25.2.2 Construction environmental management plan; printed p821; PDF p856

"Environmental Work Method Statements / Procedures would be developed by the network operator for the construction of the project. These work method statements would support the CEMP and contain instructions for contractors on how to implement the environmental management measures outlined in the CEMP and issue-specific environmental management plans developed for the construction of the project."

E238 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E239 Specific operating measures would be recorded in later plans, strategies and procedures coordinated by an internal OEMP

Details left for later design, delivery or operation | EIS; 25.3 Operational environmental management; printed p822; PDF p857

"The OEMP would be supported by a range of issue-specific environmental management plans, strategies and procedures as shown on Figure 25.2 that would document relevant specific environmental management measures during operation (as relevant). The OEMP would be kept as an internal management document which would guide the use of these issue specific environmental management plans, strategies and procedures during operation of the project."

E239 note: The report calls the OEMP internal. That does not establish that all supporting issue-specific plans will be secret or that the OEMP can never be released; avoid claiming either without approval-condition evidence. Relate to X026, which promises operator preparation of the OEMP.

E240 Later preparation and approval of issue specific plans

Details left for later design, delivery or operation | EIS; 25.4 Issue specific management; printed p823; PDF p858

"The issue-specific environmental management plans, strategies and procedures would be prepared, approved and implemented in accordance with the mitigation measures and commitments detailed in this EIS and the conditions of approval (both State and Australian Government) for the project."

E240 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway.

E241 Mitigation revisions after the exhibition

Information promised for a Submissions or Amendment Report | EIS; 25.5 Summary of management and mitigation measures; printed p824; PDF p859

"These management and mitigation measures may be revised post EIS exhibition during the response to submissions phase and incorporated into the Submissions Report, or within any Amendment Report. This would include an updated list of all management and mitigation measures which would be incorporated into the project's CEMP, issue-specific environmental management plans, strategies, procedures and environmental work method statements/procedures developed for construction, and the OEMP for the operation of the project (as relevant)."

E242 Final habitat connectivity corridors

Details left for later design, delivery or operation | EIS; 25.5.1 No-impact areas and habitat connectivity corridors; printed p824; PDF p859

> *"No-impact areas have been identified within or proximate to the project area as designated areas where EnergyCo has committed to avoid impact due to their environmental, cultural, or ecological sensitivity. These areas have been mapped so that future project design refinements and construction clearly avoid these locations. No impact areas mapped in Figures F1–F3 inclusive within Appendix F do not form part of the disturbance footprint and therefore disturbance is not proposed in these areas. In addition to no-impact areas, habitat connectivity corridors would be established to retain connectivity and avoid impact to riparian and other important biodiversity areas. Indicative locations of the habitat connectivity corridors have been identified (refer to Figure F.1 in Appendix F) and would be confirmed during detailed design."*

E243 Detailed design checked against the approved project

Details assigned to a post approval plan or process | EIS; 25.6.1 Design refinement and project change; printed p824; PDF p859

> *"Any changes resulting from detailed design (including any refinements) would be reviewed for consistency with the approved project and compliance with the conditions of approval."*

E243 note: Post approval framework: EIS §25.6.1, printed p824, PDF859; also §3.2.1, printed p74, PDF109.

E244 Express post approval uncertainty framework

Work expressly allowed after approval | EIS; 25.6.1 Design refinement and project change; printed p824; PDF p859

> *"The post approval approach to managing project uncertainty associated with inaccessible land and cumulative impacts are detailed in Table 25.1."*

E245 Biodiversity surveys before or after approval

Work expressly allowed after approval | EIS; 25.6.1 Design refinement and project change; printed p825; PDF p860

> *"Additional biodiversity field survey will be undertaken in unsurveyed portions of the project area relevant to the final disturbance footprint before and/or after project approval. Survey methods will be consistent with those employed for the BDAR. Whilst the BAM provides a rigorous and repeatable framework for biodiversity assessment in NSW, there are still project impacts that are difficult to confidently predict and remain uncertain. To address this uncertainty, assumed presence has been adopted for many biodiversity entities to provide a conservative assessment outcome."*

E245 note: Assumed presence and conservative assessment are used for inaccessible areas; later surveys may reduce the predicted impact.

E246 Network Operator adaptive management plan

Details assigned to a post approval plan or process | EIS; 25.6.1 Design refinement and project change; printed p825; PDF p860

> *"Adaptive management provides an accepted method for dealing with uncertain impacts, through the development and implementation of an adaptive management plan. An adaptive management plan (as part of the BMP) would be developed by the network operator and would address the requirements of the BAM, as listed below and described in further detail in Section 8.5 of the BDAR (refer to Technical Report 1):"*

E246 note: Timing link: E244, EIS §25.6.1, printed p824/PDF859, expressly introduces Table 25.1 as the post approval approach.

E247 Aboriginal investigations before or after approval

Work expressly allowed after approval | EIS; 25.6.1 Design refinement and project change; printed p826; PDF p861

> *"Additional targeted archaeological investigations (including survey, test excavation, culturally modified tree verification) will be undertaken within unsurveyed areas relevant to the final disturbance footprint before and/or after project approval, as required. Survey methods will be consistent with those employed for the ACHA. Additional archaeological field survey undertaken post approval would be managed through post approval processes via the Aboriginal Cultural Heritage Management Plan (ACHMP) to be developed in consultation with RAPs and Heritage NSW. The proposed management framework prioritises avoidance, followed by impact minimisation and mitigation. The ACHMP would establish protocols for further investigation, management of known and newly identified sites, ongoing consultation and implementation of mitigation measures. It would also provide procedures for unexpected finds and set out requirements for the curation and analysis of salvaged materials."*

E248 Historical investigations before or after approval

Work expressly allowed after approval | EIS; 25.6.1 Design refinement and project change; printed p826; PDF p861

> *"Additional targeted historical heritage field investigations (including targeted visual inspection) will be conducted in unsurveyed portions of the project area relevant to the final disturbance footprint before and/or after project approval, as required. Survey methods would be consistent with those employed for the HHIA. Additional field survey undertaken post approval would be managed through post approval processes via the Historical Heritage Management Plan (HHMP). The management framework prioritises avoidance, followed by impact minimisation and mitigation. The HHMP would establish protocols for further investigation, management of known and newly identified potential sites, ongoing consultation and implementation of mitigation measures. It would also provide procedures for unexpected finds."*

26 | Project justification and conclusion

E249 Further approvals depend on unfinished design

Unresolved details with no stated completion stage | EIS; 26.2 Statutory considerations; printed p832; PDF p867

> *"The project is likely to require several other approvals as discussed in Section 4. These approvals will be dependent on the final design, consultation and construction methodology outcomes for the project, which are not currently finalised. The project's compliance with the statutory requirements is further outlined in Section 4 and Appendix D."*

E250 Further avoidance during detailed design

Details left for later design, delivery or operation | EIS; 26.4.1 Actions to avoid and minimise impacts; printed p836; PDF p871

> *"Broader route selection decisions, particularly the move to the new study corridor in October 2025 (and now subsequently refined for the project area assessed in this EIS), have improved constructability, reduced steep terrain constraints and construction risks, lowered vehicle movements and environmental disturbance, and enhanced bushfire resilience and aviation safety outcomes. Overall, impact avoidance and minimisation have been a primary driver of the route selection and design refinement process, with ongoing opportunities for further avoidance and minimisation to be considered during detailed design."*

E251 Assessment based on a footprint still to be refined

Details left for later design, delivery or operation | EIS; 26.5.1 The precautionary principle; printed p838; PDF p873

> *"The EIS and technical assessments have assessed a project area as well as a reference design and disturbance footprint that would be further refined during detailed design. The EIS and technical assessments have adopted conservative approaches, with any uncertainty in the data used for the assessment being appropriately identified with assumptions applied to represent a conservative worst-case analysis to assess a range of potential impact scenarios (refer to Section 6), including:"*

E251 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E252 Final methods and design not yet determined

Unresolved details with no stated completion stage | EIS; 26.5.1 The precautionary principle; printed p838; PDF p873

> *"• where final construction methodologies or final design is yet to be determined, the most conservative assumptions have been used in noise modelling and vibration assessment for construction and operation."*

E252 note: The EIS uses a reference design or conservative assumptions. This records the detail left open; it does not mean that no impact assessment was undertaken.

E253 Future design and construction methodology refinement

Details left for later design, delivery or operation | EIS; 26.7 Evaluation and conclusion; printed p841; PDF p876

> *"• further project refinement through detailed design and development of the construction methodology, with the objective of further avoiding and minimising potential impacts on people and the environment"*

EIS Appendices A to F

E254 Final design by the network operator

Details left for later design, delivery or operation | APP; Appendix B 2.7 Final detailed design 2027 to 2028; printed p31; PDF p74

> *"The final detailed design will be developed by the network operator. The final design will include detailed technical assessments and site investigations to: • finalise property and planning outcomes • reflect project planning approvals and construction."*

E254 note: The section heading places final detailed design in 2027–2028. It is a later operator phase; this sentence does not itself use the words after determination.

E255 Habitat connectivity corridor locations

Details left for later design, delivery or operation | APP; Appendix B 3.2.2 Reference design development; printed p35; PDF p78

> *"The allocation of Habitat Connectivity Corridors has prioritised maintaining connectivity between larger patches of habitat, contained either within privately owned land, state forests, nature reserves and/or national parks. The locations of indicative Habitat Connectivity Corridors would be confirmed during detailed design and would form part of the project's Connectivity Strategy."*

E256 Number and type of waterway crossings

Details left for later design, delivery or operation | APP; Appendix B 3.2.2 Reference design development; printed p35–36; PDF p78–79

> *"The number and type of waterway crossings would be confirmed during detailed design, and all waterway crossings would be designed, installed and maintained in accordance with relevant guidelines."*

E257 Further reference design refinement before the submissions report

Information promised for a Submissions or Amendment Report | APP; Appendix B 3.2.2.3 Reference design refinement; printed p36; PDF p79

> *"Refinement of the reference design will continue throughout the exhibition period of the EIS and up to the exhibition of the Submissions Report (and Amendment Report, if required) in 2027. This would allow for further avoidance and minimisation of impacts on biodiversity relating to any further refinements made and/or biodiversity surveys within the subject land identify new biodiversity values that warrant avoidance."*

E257 note: The source describes refinement for the Submissions Report and possible Amendment Report. This is not counted as an express post approval deferral.

E258 Final micro siting and construction methods

Details left for later design, delivery or operation | APP; Appendix B 3.2.3 Final detailed design; printed p36; PDF p79

> *"Detailed design and micro siting will continue to consider how permanent and temporary project infrastructure is built and where it is located, to avoid and minimise impacts on biodiversity, with a continued focus on: • avoiding and minimising the clearing of native vegetation and habitat, prioritising the avoidance of TECs, SAII entities and habitat for threatened species • prioritising disturbance in lower condition vegetation where practicable • avoiding notable habitat features including rocky areas, cliffs and crevices • avoiding and minimising waterway crossings • retaining habitat connectivity corridors."*

E259 Heritage avoidance tier classification

Unresolved details with no stated completion stage | APP; Appendix B 3.3.1.1 Early planning and strategic design development; printed p39; PDF p82

> *"The placement of some site types within this tier structure may be subject to further investigation, significance assessment and consultation, as outlined in Technical Report 2 of the EIS."*

E260 Testing of archaeological deposits within the final footprint

Details left for later design, delivery or operation | APP; Appendix B 3.3.1 Aboriginal heritage; printed p40; PDF p83

> *"Two PADs of high archaeological significance may be subject to partial impact by the project. This includes NEREZ_SpringCk_PAD8, however, the current disturbance footprint (based on reference design) indicates that any impact would be peripheral to the PAD and further testing would be required to understand if archaeological deposit would occur in the final detailed design disturbance footprint. The other PAD of high archaeological significance, NEREZ_AtchesonsCk_PAD1, is also likely to be partially impacted. It should be noted that this PAD extends within and beyond the entire project area transmission alignment and therefore the project must intersect it at some point for access across Atchesons Gully. Nevertheless, the EIS disturbance footprint (based on the reference design), does not intersect with the portions of this PAD that contained the highest artefact frequencies and significant cultural material (through test excavation). Overall, potential impacts to PADs would be managed through archaeological excavation where relevant."*

E260 note: The current reference footprint is described and expected impacts are assessed; final testing and footprint interaction remain open.

E261 Heritage avoidance and final layout

Details left for later design, delivery or operation | APP; Appendix B 3.3.1 Aboriginal heritage; printed p40; PDF p83

> *"Opportunities for impact avoidance will be continually considered for the project. This is particularly relevant because the disturbance footprint within the project area will be subject to ongoing layout refinement as project design progresses. Aboriginal sites and PADs that fall outside the final disturbance footprint based on detailed design can be designated for avoidance as confidence in the final project design increases."*

E262 Additional heritage no impact areas

Information promised for a Submissions or Amendment Report | APP; Appendix B 3.3.1 Aboriginal heritage; printed p40; PDF p83

> *"'No-impact areas' will be applied to sites and PADs within the EIS project area that can be avoided, including sites already recorded and those identified through future investigations. The ACHA provided with the Submissions Report will include any additional 'no-impact areas' identified by further survey."*

E263 Project area and easement refinement

Details left for later design, delivery or operation | APP; Appendix B 3.5 Land use and property; printed p42; PDF p85

> *"The EIS project area will continue to be refined in response to submissions raised in the EIS and ongoing engagement with landholders. The area of affected land is also expected to further reduce during detailed design in order to establish a final easement of around 140 metre-wide for dual 500 kV transmission lines, 70 metres for single 500 kV transmission line and 120 metres for dual 330 KV transmission lines."*

E263 note: Mixed pathway: responses to EIS submissions and later detailed design. The stated expectation is a reduced affected area.

E264 Constructability and final route refinement

Details left for later design, delivery or operation | APP; Appendix B 3.6.1 Impacts to steep terrain; printed p44; PDF p87

> *"Constructability outcomes would continue to inform the route refinement process, through to the final detailed design phase of the project."*

E265 Unassessed utility connection protection and relocation works

Details left for later design, delivery or operation | APP; Appendix C Table C.5 footnote 1; printed pC-8; PDF p97

> *"1 Connection works, or any proposed utility protection or relocation works that would be required outside the project area have not been assessed as part of this EIS. Detailed assessment of connection works, or any proposed utility protection or relocation works would be undertaken, where possible, following exhibition of the EIS and incorporated in the RTS phase as part of an Amendment Report for the project (subject to detailed studies undertaken in consultation with the relevant utility providers and councils). Where further ongoing detailed studies are required in consultation with the relevant utility providers and councils post RTS phase and during detailed design, additional environmental assessment would be undertaken. The proposed works would also be assessed to confirm they are consistent with the approved project."*

E265 note: Assessment in an Amendment Report is intended where possible. The same footnote also permits ongoing studies after the response to submissions phase and during detailed design, with further environmental and consistency assessment.

E266 Crown land claims and access arrangements

Details left for later design, delivery or operation | APP; Appendix D Table D.3 Aboriginal Land Rights Act 1983; printed pD-4; PDF p120

> *"The project area intersects Crown Land which is subject to undetermined land claims under the Aboriginal Land Rights Act 1983 (refer to Section 12 of the EIS). EnergyCo will continue to liaise with the Local Land Services (LLS) and/or the relevant LALC (depending on the status of this claim) regarding these land parcels and, if it is confirmed during detailed design that the project's construction area will impact these parcels, will make the necessary arrangements, with LLS and/or the relevant LALCs if applicable, to gain access to these land parcels."*

E267 Permanent travelling stock reserve impacts

Details left for later design, delivery or operation | APP; Appendix D Table D.3 Local Land Services Act 2013; printed pD-9; PDF p125

> *"Operation of the project would affect around 22 hectares of land designated as TSRs. Engagement with LLS would continue to be undertaken during detailed design to confirm any permanent impacts to TSRs. Impacts to TSRs are discussed further in Section 13 of the EIS and Technical Report 6."*

E268 Detailed waste plans following determination

Work expressly allowed after approval | APP; Appendix D Table D.3 Waste Avoidance and Resource Recovery Act 2001; printed pD-11; PDF p127

> *"Section 23 of the EIS provides an assessment of waste streams and consideration of management strategies, applying the hierarchy established by the WARR Act. Following determination, detailed waste management plans will be developed for the construction and operational phases of the project."*

E269 Utility-crossing development in consultation with asset owners during detailed design

Details left for later design, delivery or operation | APP; Appendix F §1.1, Table F.1; printed p1; PDF p254

> *"Ongoing consultation will occur with utility providers and councils during detailed design, and the utility crossings will be developed in consultation with asset owners."*

E269 note: No express determination milestone; ongoing consultation and detailed design are stated. This may repeat project-description utility commitments already identified elsewhere.

E270 Further environmental assessment of out-of-area utility adjustments and consistency assessment against the approved project

Details left for later design, delivery or operation | APP; Appendix F §1.1, Table F.1; printed p1; PDF p254

> *"Utility adjustment works outside the assessed area will undergo further environmental assessment. Utility works will be assessed for consistency with the approved project."*

E270 note: The wording refers to an approved project but does not literally say after determination. Further assessment is promised; do not infer that such work is exempt from environmental review.

E271 Final locations of additional ancillary sites, with impact-based site-selection criteria, to be confirmed in detailed design and documented in the CEMP

Details left for later design, delivery or operation | APP; Appendix F §1.1, Table F.1; printed p2–3; PDF p255–256

> *"Additional ancillary sites will be selected using the project location assessment protocol. Ancillary sites will consider noise, air quality, light spill and landholder impacts as the location assessment protocol and will apply a set of environmental, social and constructability criteria to guide site selection and minimise impacts, while maintaining flexibility for construction. Key considerations which will be applied through this protocol include: • avoidance of waterways and maintenance of appropriate setbacks based on stream order and waterway type … • use of existing access or locations that can be accessed without introducing additional impacts beyond those assessed in the EIS … The application of*

this protocol enables the identification of suitable ancillary site locations within the project area, while allowing refinement during detailed design. The final locations will be confirmed during detailed design and documented in the Construction Environmental Management Plan (CEMP).”

E271 note: The protocol constrains later choices to the project area and assessed impacts/clearing limits; preserve these limits. No express post-determination milestone.

E272 CEMP measures addressing rehabilitation commitments and obligations informed by pre-condition assessments

Details left for later design, delivery or operation | APP; Appendix F §1.1, Table F.1; printed p3; PDF p256

“The CEMP will include measures to address rehabilitation commitments including: • Demobilisation and rehabilitation would occur progressively where practicable. • Construction ancillary sites, workforce accommodation camps, laydowns and stringing sites would be decommissioned and rehabilitated. • Pre-condition assessments would inform rehabilitation obligations.”

E272 note: The measure already commits to decommissioning and rehabilitation of specified temporary sites and progressive works where practicable. Construction timing is explicit.

E273 Full extents and buffers of no-impact areas are to be determined following site verification before construction

Details left for later design, delivery or operation | APP; Appendix F §1.2, Figures F.1a–F.1e; Unnumbered maps: Figures F.1a–F.1e (Maps 2–6 of 23); PDF p364–368

“This figure shows the point location of each site where a no-impact area will be implemented. The full extent of no-impact areas (including buffers) will be determined following site verification of the appropriate no-impact area prior to construction works commencing.”

E273 note: The commitment is to verify and establish no-impact areas before work, not permission to damage protected sites. Detailed maps F.1f–F.1v are also provided. The five identical notes are repeated references to one issue, not five independent deferral issues. The map note has line-wrap hyphenation normalised (no- impact to no-impact).

Technical Report 1 | **Biodiversity**

E274 Final impacts are to be confirmed after final design

Details left for later design, delivery or operation | TR01; Executive Summary Direct impacts; printed pxv; PDF p19

“The assessment is considered to be representative of the extent and type of impact associated with the project, however these impacts will be confirmed following the completion of final design.”

E274 note: The report considers the reference-design assessment representative.

E275 Design refinement and new biodiversity surveys continue after exhibition

Information promised for a Submissions or Amendment Report | TR01; 7.1.7 Further Design Refinement; printed p598; PDF p664

“Refinement of the reference design will continue after the exhibition of the EIS. This will allow for further avoidance and minimisation of impacts on biodiversity as refinements are made and/or biodiversity surveys within the subject land identify new biodiversity values that warrant avoidance.”

E275 note: Only after-exhibition timing is stated here; do not call this sentence alone a post-approval commitment.

E276 Need for blasting will be confirmed during detailed design

Details left for later design, delivery or operation | TR01; 7.2.1 Table 7.7; printed p600; PDF p666

> *"Blasting may be required depending on geotechnical conditions. This would be confirmed during detailed design and managed in accordance with the project's CEMP."*

E276 note: Conditional on geotechnical conditions.

E277 The final number/type of waterway crossings remains to be confirmed

Details left for later design, delivery or operation | TR01; 7.2.1 Table 7.7; printed p601; PDF p667

> *"The number and type of waterway crossings would be confirmed during detailed design."*

E277 note: The table also favours existing bridges and crossings.

E278 Habitat corridor locations will be confirmed through detailed design and the connectivity strategy

Details left for later design, delivery or operation | TR01; 7.2.2 Table 7.8; printed p603; PDF p669

> *"The locations of Habitat Connectivity Corridors would be confirmed during detailed design and would form part of the project's Connectivity Strategy."*

E278 note: At least 27 indicative corridors are already identified.
E278 additional reference: Related location in the same report: §7.1.5 p595 (PDF661); §7.1.6 p598 (PDF664); B13 p760 (PDF826).

E279 Threatened-species protection design elements are still to be developed

Details left for later design, delivery or operation | TR01; 7.2.2 Table 7.8; printed p603; PDF p669

> *"Design elements to minimise and avoid impacts on threatened species would continue to be developed during detailed design, and would likely include:"*

E279 note: Examples are described, including bird diverters and fauna crossing structures.

E280 The Network Operator will determine the actual vegetation clearance zone

Details left for later design, delivery or operation | TR01; 8.0 Impact Assessment; printed p607; PDF p673

> *"While the clearance zone will be determined by the Network Operator, EnergyCo has reviewed existing NSW practices and for the purposes of the EIS has applied a 10 m clearance."*

E280 note: The EIS adopts a 10 m clearance and says this is more conservative than some current practices.

E281 Karst protection methods and construction vibration limits require later design and specialist advice

Details left for later design, delivery or operation | TR01; 8.3.1.3 Consequences; printed p708; PDF p774

> *"These potential impacts would be mitigated through detailed design of the works to avoid mapped karst, appropriate equipment selection, material selection and implementation of construction mitigation and management measures. EnergyCo will seek geotechnical and vibration advice to inform the construction vibration limits to be applied to works on Sargeants Gap Road to minimise vibration impacts to Timor Caves."*

E281 note: The report describes works as relatively minor and potential impacts as theoretical; it also recognises karst sensitivity.

E282 CEMP, associated plans, strategies and procedures remain to be prepared

Details left for later design, delivery or operation | TR01; 8.5.1 Construction Environmental Management Plan; printed p744; PDF p810

> *"Construction activities that would occur following pre-construction and enabling works would be managed in accordance with a CEMP, associated sub plans, strategies and procedures to be prepared and implemented during construction."*

E282 note: The report provides required contents and identifies approvals/conditions as controls.

E283 Specific construction biodiversity measures will be documented in a future BMP

Details left for later design, delivery or operation | TR01; 8.5.1 Construction Environmental Management Plan; printed p745; PDF p811

> *"The Biodiversity Management Plan (BMP) will be prepared as a subplan of the CEMP and will document specific biodiversity management measures for the construction phase of the project. The BMP will be reviewed and updated as required."*

E283 note: The BDAR does already propose detailed management commitments in Table8.73.
E283 additional reference: Related location in the same report: Table8.73 B1 pp746–747 (PDF812–813).

E284 The Network Operator will prepare the operational plan including biodiversity management

Details left for later design, delivery or operation | TR01; 8.5.2 Operation Environmental Management Plan; printed p745; PDF p811

> *"an OEMP to be prepared and implemented by the Network Operator, which includes an Operational Biodiversity Management Plan."*

E284 note: Operation remains subject to relevant approval conditions and EIS measures.

E285 Detailed-design changes are to be checked against the approved project and conditions

Details left for later design, delivery or operation | TR01; 8.5.3 Design Refinement and Project Change Management; printed p745; PDF p811

> *"Any changes resulting from detailed design (including any refinements) would be reviewed for consistency with the approved project and compliance with the conditions of approval."*

E285 note: This establishes a compliance constraint, not unlimited permission to change the project.

E286 The BMP will set quantitative performance measures, triggers, corrective actions and adaptive arrangements

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B1; printed p746; PDF p812

> *"be framed around SMART objectives and include quantitative performance measures, triggers, corrective actions and an adaptive management plan that consolidates and references the sub plans and Biodiversity Impact Monitoring Program (B23) listed in this table;"*

E286 note: The table requires finalisation before clearing; the cross-reference B23 is reproduced as printed.

E287 Clearing permits, protection, two-stage/partial clearing and rehabilitation details are to be set in a sub-plan

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B2; printed p748; PDF p814

> *"A Vegetation Clearing Procedure will be prepared as a sub-plan to the BMP that includes: • the requirements to obtain an internal clearing and disturbance permit, prior to the commencement of clearing and disturbance • demarcation and protection of retained vegetation and "no-go" areas • a protocol for fauna management (B10) • a procedure for two-stage clearing (B11) • a protocol for partial clearing (B12) • measures to minimise, manage and re-use vegetation waste, including mulch, logs, and opportunities for millable timber • any restoration or rehabilitation requirements"*

E287 note: The report already specifies certain hand-clearing locations and buffers.

E288 The Network Operator will map sensitive areas and incorporate the avoidance framework in later plans

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B3; printed p749; PDF p815

> *"During detailed design, the Network Operator will identify and map Sensitive Areas to inform further avoidance and micro-siting. This mapping will be updated and maintained throughout construction and will include, as a minimum, the biodiversity constraints as outlined in Section 7.0 of the BDAR, which identifies and prioritises biodiversity values to avoid and minimise impacts on. The Sensitive Area*

Mapping and avoidance framework will be incorporated into the BMP (and GIS/map based site-specific sensitive areas and associated protocols) for construction implementation."

E288 note: Existing biodiversity constraints provide a minimum; the table itself rates risk of failure High depending on design/constructability.

E289 A protocol for incidental/unexpected species finds will be prepared as part of the BMP

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B6; printed p751; PDF p817

"An unexpected and incidental finds protocol will be included as a sub-plan to the BMP. The protocol will be implemented if threatened species or populations that are assessed by the BDAR are observed outside of mapped species polygons (incidental find), or if threatened species or populations not assessed by the BDAR are found (unexpected find)."

E289 note: The measure lists required stop-work, assessment and notification components on following pages.

E290 Artificial hollow replacement numbers, landowner-approved locations and installation targets will be set later

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B9; printed p755; PDF p821

"The Strategy will define replacement numbers based on the number and types of hollows removed, the process for determining landowner- approved locations and installation timing, including installation targets before clearing and timeframes for installation after clearing."

E290 note: The strategy responds to the number/types of hollows actually removed; pre-clearing installation is qualified by practicability.

E291 Triggers and responses to delayed/underperforming hollow installation are to be set later

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B9; printed p755; PDF p821

"A Trigger Action Response Plan (TARP) will be provided to address delays or underperformance against installation or effectiveness targets. The TARP will: • define the triggers or thresholds relating to performance targets • outlines the steps to be taken if the trigger is reached"

E291 note: The report identifies what the future TARP must address.

E292 Fauna survey processes, group-specific safeguards, relocation sites and handling/veterinary arrangements remain in a future protocol

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B10; printed p756; PDF p822

"A fauna management protocol will be prepared as a sub-plan to the BMP that includes: • A process for how surveys will be conducted by a suitably qualified ecologist prior to clearing. Surveys will confirm that protection measures are in place and include fauna searches, hollow inspections, relocation and identification of nesting fauna and habitat features that require relocation and/or further management during clearing. • Outlines specific management measures for each fauna group with reference to known threatened species and will include, rubbish controls, vehicle-strike controls, and monitoring of use of key habitat features such as caves/cliff lines/turtle-nesting habitat within proximity of construction. • Identifies fauna relocation areas and locations for salvaged natural habitat materials (including bush rock and logs), • Includes a Fauna Handling Protocol, including handling procedures for species fauna groups (e.g. frogs), the identification of pre-confirmed veterinary support and wildlife rescue contacts."

E292 note: Pre-clearing surveys are necessarily later field activities; the issue is their detailed management framework.

E293 Partial-clearing methods will be defined in a future protocol

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B12; printed p758; PDF p824

"A Partial Clearing Protocol will be prepared as part of the Vegetation Clearing Protocol (a sub- plan to the BMP) that defines clearing methods for disturbance area B."

E293 note: The table provides minimum content, equipment/hand-clearing directions and verification requirements.

E294 A future strategy will set corridors and numbers/types/locations of crossing structures

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B13; printed p760; PDF p826

> *"A Connectivity Strategy will be developed as a sub-plan to the BMP. The Connectivity Strategy will be prepared in consultation with CPHR that outlines measures to maintain and provide habitat connectivity for target fauna species susceptible to habitat fragmentation, including (but not limited to) koalas, Squirrel gliders, Southern Greater Gliders and Yellow- bellied gliders. The strategy will: • identify locations for habitat connectivity corridors to be retained (i.e. in gullies and/or riparian zones), including as a minimum, the 27 indicative habitat corridors identified in the BDAR (their locations to be determined during detailed design) • outline protection measures for the habitat connectivity corridors to be retained across the transmission easement • prescribe the number, type and location of structures to be installed (e.g. glider poles, koala refuge poles, rope bridges), with locations to be developed in consultation with relevant landholders."*

E294 note: At least 27 indicative corridors already exist; next text says artificial crossings every 500 m in full clearing will be investigated, not unconditionally installed.

E295 A biodiversity biosecurity sub-plan remains to be prepared

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B15; printed p761; PDF p827

> *"The Biosecurity Management Plan will be prepared as a sub-plan to the BMP and will include measures to prevent the introduction and spread of weeds, pathogens, pests and diseases."*

E295 note: Minimum washdown, material certification and mapping controls are described across pp761–762.

E296 A future riparian/aquatic plan will set site measures

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B16; printed p762; PDF p828

> *"A Riparian Vegetation and Aquatic Biodiversity Management Plan (RVABMP) will be prepared as a sub-plan to the BMP, to minimise impacts on riparian vegetation and threatened aquatic species, including turtles and amphibians."*

E296 note: The table includes important fixed buffers and hand-clearing commitments; no claim that all riparian safeguards are absent.
E296 additional reference: Related location in the same report: Appendix B Aquatic Assessment Table5.1 p80 (PDF1219).

E297 Temporary/permanent lighting is to be designed in detailed design

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B17; printed p764; PDF p830

> *"Where lighting is required, lighting will be designed in accordance with the National Light Pollution Guidelines for Wildlife (Commonwealth DCCEEW 2023) and will include directional lighting to minimise spill and direct temporary construction lighting away from remnant vegetation wherever possible."*

E297 note: The national guideline and directional-lighting requirement are stated; not specifically the camp lighting layout.

E298 Additional bird-diverter locations and exact installation timing are to be determined

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B18; printed p764; PDF p830

> *"As a minimum, priority locations are those identified in the BDAR, with additional locations to be determined during detailed design by a qualified ecologist in consultation with CPHR. Priority locations may include near riparian corridors, connectivity corridors and known threatened cockatoo owl/raptor records and key habitats. Installation will occur during line stringing or within 6 months following line installation, to be determined in consultation with CPHR."*

E298 note: Existing priority locations and a maximum six-month post-installation period are already stated.

E299 A future BIMP will consolidate quantitative triggers, corrective actions and monitoring

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B20; printed p765; PDF p831

> *"Include a BIMP as part of the BMP. The BIMP will include a structured monitoring program with annual reporting and an adaptive management component with quantitative triggers and corrective actions*

(i.e. as outlined in a TARP). The BIMP must consolidate the monitoring and adaptive management requirements for all BMP subplans identified in this table."

E299 note: Annual reporting and independent-audit review are required by this measure.
E299 additional reference: Related location in the same report: §8.6.2 p773 (PDF839), which refers to B19 in its prose.

E300 A future incident response procedure will set stop-work, further-assessment and reporting requirements

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B22; printed p766; PDF p832

"Prepare an incident response procedure as part of the CEMP to deal with biodiversity impacts Procedure will include stop-work triggers, requirements for additional assessment/ecologist input in line with current legislative requirements for non-approved impacts, notification and reporting to relevant agencies, and adaptive management requirements."

E300 note: A minimum scope is specified; preconstruction is the preparation stage.

E301 Operational biodiversity procedures will be developed within the operator's EMS/OEMP

Details left for later design, delivery or operation | TR01; 8.5.4 Table 8.73 B23; printed p766; PDF p832

"Operational biodiversity management procedures will be developed within the Network Operator's EMS/OEMP to implement biodiversity commitments including incident management, monitoring requirements, vegetation management commitments (including weed management, ongoing habitat protection requirements, operational sediment and erosion controls, and any restoration measures) and avoid unnecessary disturbance in retained and partially cleared native vegetation areas."

E301 note: The report describes the types of commitments those procedures must implement.

E302 The operator will develop an adaptive plan for uncertain impacts

Details left for later design, delivery or operation | TR01; 8.6 Adaptive Management Strategy for Uncertain Impacts; printed p772; PDF p838

"An adaptive management plan will be developed by the Network Operator and will address the requirements of the BAM, as listed below and described in the following subsections:"

E302 note: The report describes an accepted approach and required plan content; existence of adaptive management is not itself a deficiency.

E303 Confirmation surveys on inaccessible land are deferred until before construction where possible

Details left for later design, delivery or operation | TR01; 8.6 Adaptive Management Strategy for Uncertain Impacts; printed p773; PDF p839

"The strategy will be designed to confirm the presence or absence of threatened species in previously inaccessible area prior to the commencement of construction where possible and where construction constraints do not allow for this type of adaptive management, the full assumed presences will be retained for each threatened entity."

E303 note: If construction constraints prevent verification, the precautionary assumption that species are present is retained; do not claim the land is treated as having no biodiversity.

E304 Wastewater-system details including design/capacity will be determined in detailed design

Details left for later design, delivery or operation | TR01; Appendix B Aquatic Assessment Table 5.1 SW7; printed p84; PDF p1223

"The specifics of on-site wastewater management systems, including design and capacity, would be determined in the detailed design phase, and will comply with ANZG Volume 3: Primary industries—Rationale and background information, Chapter 4: Irrigation water quality (ANZG, 2018) and the requirements of the Public Health Act 2010."

E304 note: The table specifies compliance criteria and wastewater reuse where possible.

Technical Report 2 | **Aboriginal heritage**

E305 Further investigation outcomes are promised in the Submissions/Amendment Report and, if required, afterwards

Information promised for a Submissions or Amendment Report | TR02; 11.1 Limitations; printed p279; PDF p301

> *"The outcomes of the proposed further investigations will be provided as part of the Submissions Report andAmendment Report and, if required, following this process."*

E305 note: This mixed timing does not by itself establish all outstanding investigations will be completed after approval; explicit rollover is in §12.3.1.

E306 The final areas avoiding ground disturbance are to be confirmed in detailed design

Details left for later design, delivery or operation | TR02; 11.2.1 Direct Sources; printed p281; PDF p303

> *"However, the extent of areas to be avoided by disturbance will be confirmed in detailed design and so a conservative assessment has been undertaken assuming that all sites not in no-impact areas may be impacted."*

E306 note: A conservative assessment assumes impact to all sites outside designated no-impact areas.

E307 Safe working distances for some equipment will be refined in detailed design

Details left for later design, delivery or operation | TR02; 11.2.2.1 Vibration; printed p282; PDF p304

> *"Additional minimum working distance refinement will be considered for other construction equipment/activity (e.g. vibratory rollers and rock breakers) during detailed design and construction methodology planning."*

E307 note: Indicative minimum distances and standards are already provided.

E308 Management of any site-specific water-flow impacts is to be developed with later design and the ACHMP

Details left for later design, delivery or operation | TR02; 11.2.2 Indirect Sources; printed p283; PDF p305

> *"Should potential impacts to specific Aboriginal sites be identified during detailed design and the construction methodology development, management measures will be developed as necessary and included in an updated ACHA (referred to as the addendum ACHA (refer Section 12.0) and ACHMP."*

E308 note: The report expects water-flow impacts to be localised and minor; this is not evidence of known severe damage.

E309 Tower placement remains unfinalised and constrains the Songlines impact assessment

Details left for later design, delivery or operation | TR02; 11.4.2 Cultural values; printed p293; PDF p315

> *"given that the placement of transmission towers has not yet been finalised (and will be determined through detailed project design)."*

E309 note: Surrounding text says it is unclear which recorded sites form part of identified Songlines.

E310 The core heritage plan and detailed methodologies will be finalised after approval

Work expressly allowed after approval | TR02; 12.2.2 Aboriginal Cultural Heritage Management Plan; printed p310; PDF p332

> *"The ACHMP will be finalised following project approval and, in addition to the matters outlined above, will address all relevant conditions of approval. Importantly, the ACHMP will provide detailed methodologies for the implementation of the management measures outlined below. As such, the management methods outlined in Section 12.2.3 to Section 12.2.5 below are intended to establish management commitments that will be refined in the ACHMP."*

E310 note: The report states commitments now and promises RAP/Heritage NSW consultation; it is the methodology and refinement that are deferred.
E310 additional reference: Related location in the same report: Table 12.4 AH1, p343 (PDF365).

E311 Protection methods are assigned to particular sites only once the detailed footprint is established

Details left for later design, delivery or operation | TR02; 12.2.3.1 Principles; printed p311; PDF p333

> *"Active and passive measures are outlined in this section and will only be assigned to specific Aboriginal sites and PADs once their relationship to the final project disturbance footprint based on detailed design is established."*

E311 note: No-impact areas already exist for some sites; not all protection is deferred.

E312 Additional no-impact areas and their management may be determined both before and after approval

Work expressly allowed after approval | TR02; 12.2.3.2 Assessing Further Opportunities for Avoidance; printed p311; PDF p333

> *"The addendum ACHA will include any additional 'no-impact' areas identified to inform the Submissions Report and Amendment Report, and the ACHMP will set out the process for identifying, documenting, and managing 'no-impact' areas following project approval. This may involve revising the avoidance tier system discussed in Section 12.2.3.3 so that certain sites are assigned avoidance and management measures based on criteria developed in the ACHMP."*

E312 note: The first step is an addendum for the submissions/amendment reports; only the continuing process is explicitly post-approval.
E312 additional reference: Related location in the same report: Table 12.4 AH2, pp343–344 (PDF365–366).

E313 Nominal buffers may be refined in the post-approval ACHMP

Details assigned to a post approval plan or process | TR02; 12.2.3.3 Active Protection; printed p312; PDF p334

> *"Appropriate fencing/barrier buffers to be applied. At present, this will incorporate a nominal 5 m internal buffer from site features, site boundaries, or PAD boundaries for active protection against potential direct impacts. However, buffers may be refined during the preparation of the ACHMP to better respond to known impact risks."*

E313 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. A nominal 5 m buffer is already stated; post-approval timing comes from §12.2.2.

E314 Monitoring frequency will be established later in the ACHMP

Details assigned to a post approval plan or process | TR02; 12.2.3.3 Active Protection; printed p312; PDF p334

> *"Monitoring requirements to assess site condition and the effectiveness of the implemented avoidance measure. This could range from a single post-construction monitoring exercise to ongoing condition assessments at bi-annual intervals for the duration of construction work. Frequency of monitoring requirements will be established in the ACHMP."*

E314 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. A range from a single post-construction check to biannual checks is described; ACHMP timing is explicit in §12.2.2.

E315 Sites, triggering distance/criteria and construction activities requiring monitoring remain to be determined

Details assigned to a post approval plan or process | TR02; 12.2.3.4 Archaeological Monitoring; printed p312; PDF p334

> *"The ACHMP will develop a shortlist from the Aboriginal sites covered by no-impact areas that will require archaeological monitoring if the project disturbance footprint encroaches within a certain distance that may place a site at a higher-level risk of inadvertent impact. The criteria for which sites require this measure will be developed in the ACHMP in consultation with RAPs. The details of which construction activities will require monitoring will be developed in the ACHMP."*

E315 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. Post-approval timing follows §12.2.2; consultation with RAPs is required.
E315 additional reference: Related location in the same report: Table 12.4 AH3, pp344–345 (PDF366–367).

E316 The method for managing indirect impacts that detailed design cannot avoid is deferred to the ACHMP

Details assigned to a post approval plan or process | TR02; 12.2.3.6 Protection from Indirect Impacts; printed p313; PDF p335

> *"The ACHMP will outline methodology and procedure for mitigating and/or managing indirect impacts that cannot be avoided through the detailed design stage of the project."*

E316 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. Project no-impact and vibration commitments remain; ACHMP is finalised post-approval under §12.2.2.
E316 additional reference: Related location in the same report: Table 12.4 AH5, pp345–346 (PDF367–368).

E317 Protective or mitigation measures for any unavoidable water-flow impacts are to be set later

Details assigned to a post approval plan or process | TR02; 12.2.3.6 Water Flow Changes; printed p313; PDF p335

> *"Should impacts to specific Aboriginal sites be identified during detailed design and the construction methodology development and cannot be avoided, the ACHMP will set out appropriate protective or mitigation measures developed consultation with the project soil and water management plan."*

E317 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. Conditional on identification of impacts; report calls the current risk minor.

E318 The threshold for reasonable/practical artefact collection effort is to be defined in the ACHMP

Details assigned to a post approval plan or process | TR02; 12.2.4.1 Surface Artefact Collection; printed p314; PDF p336

> *"Accordingly, the ACHMP will define what constitutes reasonable and practical collection efforts before management of these sites is considered complete."*

E318 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. The report already describes a general collection method and recognises visibility constraints.

E319 Salvage methodology and specific salvage sites are expressly not supplied in this ACHA

Work expressly allowed after approval | TR02; 12.2.4.2 Archaeological Excavation; printed p315; PDF p337

> *"A salvage excavation methodology will be developed as part of the ACHMP and be implemented as a post-approval measure. Salvage excavation will need to respond to how the final project disturbance footprint intersects with PADs with confirmed deposits, and therefore this ACHA does not provide a salvage excavation methodology, nor has nominated specific sites for salvage."*

E319 note: Salvage itself is conventionally a later activity; the evidentiary point is the missing methodology/site selection.
E319 additional reference: Related location in the same report: Table 12.4 AH7, p349 (PDF371).

E320 Post-approval investigations will determine when salvage is required or unmitigated impact applies

Work expressly allowed after approval | TR02; 12.2.5 Unmitigated Impact; printed p317; PDF p339

> *"The ACHMP will set out a process for PADs that require investigative excavation after project approval. This will include significance assessment and excavation results thresholds to determine if salvage is required, or if unmitigated impact will apply."*

E320 note: The process includes significance assessment and excavation thresholds.
E320 additional reference: Related location in the same report: Table 12.4 AH12, p351 (PDF373).

E321 Any incomplete investigation/assessment commitments may roll past approval

Work expressly allowed after approval | TR02; 12.3.1 Overview; printed p317; PDF p339

> *"Further investigation and assessment will be required across the assessment and post-approval stages of the project. This section aims to clarify at which stage the commitments will be addressed, where known. However, given that the progression of these works require additional land access and that timing is uncertain, the general principle is that any commitments not achieved prior to project approval will be addressed post-approval under the provisions of an ACHMP."*

E321 note: Access constraints and uncertain timing are the stated reasons; an addendum is still intended.

E322 Some survey and identification of new sites may occur after approval

Work expressly allowed after approval | TR02; 12.3.2 Archaeological Survey; printed p317; PDF p339

> *"Survey reporting will align with the relevant stage of the project. For example, survey completed to inform the Submissions Report and Amendment Report will be provided in the addendum ACHA, while the ACHMP will set out reporting requirements for any survey completed post-approval so that survey results are documented and newly identified sites are assessed and managed appropriately."*

E322 note: Survey completed for submissions/amendment reports is intended to be reported before approval too.
E322 additional reference: Related location in the same report: Table 12.4 AH13, pp351–353 (PDF373–375).

E323 Pre-determination test excavation is an aim dependent on access and approval timing

Information promised for a Submissions or Amendment Report | TR02; 12.3.3 Opportunities for Further Test Excavation; printed p318; PDF p340

> *"Further archaeological test excavation will aim to be undertaken to inform the Submissions Report and Amendment Report in an addendum ACHA. The scope of testing during this period will be dependent on land access availability and timing considerations for project approval."*

E323 note: Read with §12.3.1 for the explicit post-approval fallback; not all this work is stated to be post-approval.
E323 additional reference: Related location in the same report: Table 12.4 AH14, p353 (PDF375).

E324 The refined model will guide investigations into the post-approval phase

Work expressly allowed after approval | TR02; 12.3.4 Predictive Model Review; printed p319; PDF p341

> *"The predictive model will be reviewed based on the outcomes of additional investigations completed for the addendum ACHA. Any refinements to the archaeological sensitivity mapping will be carried into the ACHMP. The intent of the predictive model (as refined) will be to guide further investigation requirements in project area into the post-approval phase for the project."*

E324 note: Model refinements first draw on the addendum investigations.
E324 additional reference: Related location in the same report: Table 12.4 AH15, p354 (PDF376).

E325 Unresolved Songlines issues pass from the addendum to the ACHMP

Details assigned to a post approval plan or process | TR02; 12.3.5.1 Clarifying Potential Impacts on Songlines; printed p319; PDF p341

> *"The proposed inspections will aim to determine if there are Aboriginal sites contributory to the Songline(s) at risk of impact. The addendum ACHA will attempt to resolve if impacts are anticipated, and any potential management measures and / or detailed design considerations that should be explored. Any matters not resolved will be addressed in through a process to be developed in the ACHMP."*

E325 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. An attempt to resolve impacts in the addendum is promised; ACHMP timing is in §12.2.2.
E325 additional reference: Related location in the same report: Table 12.4 AH16, p354 (PDF376).

E326 The scope and assessment of culturally significant ecological values are still to be developed

Information promised for a Submissions or Amendment Report | TR02; 12.3.5.2 Addressing Impact to Culturally Significant Ecological Values; printed p319; PDF p341

> *"To address RAP concerns about the potential project impact on culturally significant ecological values (for context refer to Table 2.7 Item 3 and Section 11.4.2.3), further investigation and assessment will be undertaken with the aim to include the outcomes in the addendum ACHA. EnergyCo will develop a scope which may include the following:"*

E326 note: The aim is to include results in the addendum; any post-approval inference needs the general fallback in §12.3.1.
E326 additional reference: Related location in the same report: Table 12.4 AH17, pp354–355 (PDF376–377).

E327 The ACHMP will set the process for identifying and managing additional vibration-sensitive sites

Details assigned to a post approval plan or process | TR02; 12.3.6 Assessment of Indirect Vibration Impacts; printed p320; PDF p342

> *"If any potential impacts may occur, the ACHMP will set out a process for identifying, assessing and managing indirect impacts for any additional vibration-sensitive Aboriginal site types identified within a potential vibration impact range as set out in Section 12.2.3.5. This may include the use of predictive modelling to identify the potential for certain site types to occur outside of the project area, followed by provisions to manage identified areas at risk of impact."*

E327 note: ACHMP finalised following approval: TR02 §12.2.2, printed p310, PDF332. Construction methodology is also promised to keep impacts within surveyed areas; §12.2.2 provides post-approval timing.
E327 additional reference: Related location in the same report: Table 12.4 AH18, p355 (PDF377).

E328 Field verification, impact assessment and management of culturally modified trees may be completed after approval

Work expressly allowed after approval | TR02; 12.3.7 Culturally Modified Tree Verification and Assessment; printed p321; PDF p343

> *"Step 3: The outcomes of the fieldwork, impact assessment and management approach will be documented either in the addendum ACHA to inform the Submissions Report and Amendment Report, or in accordance with a process set out in the ACHMP if completed after project approval."*

E328 note: The report allows pre-approval documentation in the addendum as well; not all trees are deferred.
E328 additional reference: Related location in the same report: Table 12.4 AH19, pp355–356 (PDF377–378).

Technical Report 3 | **Historical heritage**

E329 Detailed design/construction methods will determine which historical heritage is intersected by the final footprint

Details left for later design, delivery or operation | TR03; 3.5.1 Direct Impacts; printed p35; PDF p76

> *"Continued development of the project design and construction methodology, through to detailed design will determine how the project's final disturbance footprint will intersect with listed heritage items, potential heritage items and areas of historical archaeological potential."*

E329 note: The assessment assumes a conservative worst-case impact across the broader project area except no-impact areas.
E329 additional reference: Related location in the same report: Executive summary px (PDF14); §11 p432 (PDF473).

E330 Unresolved matters in the response-to-submissions heritage assessment may be addressed after approval

Work expressly allowed after approval | TR03; 12.0 Management and Commitments; printed p472; PDF p513

> *"Any matters not resolved through the RTS HHIA would be addressed post-approval through the preparation and implementation of an HHMP."*

E330 note: An addendum assessment before determination is also proposed.

E331 The HHMP is to be prepared/endorsed before construction

Details assigned to a post approval plan or process | TR03; 12.2 Table 12.2 HH1; printed p474; PDF p515

> *"A Historical Heritage Management Plan (HHMP) will be prepared in consultation with and endorsed by Heritage NSW. The HHMP will be prepared (and endorsed) prior to the commencement of construction and will include as a minimum:"*

E331 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520. Heritage NSW endorsement is required; §12.3.1 expressly confirms post-approval finalisation.

E332 Additional heritage no-impact areas may be selected through future assessment/design or the HHMP

Details assigned to a post approval plan or process | TR03; 12.2 Table 12.2 HH3; printed p475; PDF p516

> *"future no-impact areas as determined by future assessments, detailed design process and/or the implementation of the HHMP."*

E332 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520. Existing no-impact areas are already identified in Table 11.2.

E333 Alternative methods for locations unable to meet minimum working distances are left to the HHMP

Details assigned to a post approval plan or process | TR03; 12.2 Table 12.2 HH6; printed p476; PDF p517

> *"If during detailed design minimum working distances for vibration intensive equipment cannot be met, the HHMP will outline the methodology and procedure for mitigating and/or managing potential indirect impacts through alternative construction methodologies."*

E333 note: HHMP finalised following approval: TR03 §12.3.1, printed p479, PDF520. The report already provides minimum working-distance guidance.

E334 Archaeological monitoring research design/work methods are to be developed in the HHMP

Work expressly allowed after approval | TR03; 12.2 Table 12.2 HH7; printed p476; PDF p517

> *"The archaeological research design and work method statement will be developed in consultation with Heritage NSW as part of the HHMP and implemented as a post-approval measure."*

E334 note: Applies to ground disturbance at Former Hanging Rock Village and Balala Former Structures 2.
E334 additional reference: Related location in the same report: §12.3.5.1, p482 (PDF523).

E335 Salvage excavation research design/work methods will be developed after approval

Work expressly allowed after approval | TR03; 12.2 Table 12.2 HH9; printed p477; PDF p518

> *"If required, an archaeological research design and work method statement for the proposed locations of archaeological investigation or monitoring will be developed in consultation with Heritage NSW as part of the HHMP and implemented as a post-approval measure."*

E335 note: Salvage excavation is conditional on test excavation confirming significant remains.
E335 additional reference: Related location in the same report: §12.3.5.3, p483 (PDF524).

E336 Location-specific research design and work method statements are to be prepared before archaeological works

Details left for later design, delivery or operation | TR03; 12.2 Table 12.2 HH10; printed p477; PDF p518

> *"A location specific archaeological research design and archaeological work method statement will be prepared for each area of archaeological potential that will be subject to ground disturbance as part of the project. The archaeological research design and work method statement will be prepared in accordance with the relevant Heritage NSW guidelines. It will be prepared in consultation (and endorsed by) Heritage NSW prior to any on-site archaeological works being undertaken."*

E336 note: Heritage NSW consultation and endorsement are required.

E337 Targeted survey of unsurveyed areas expressly may occur after approval

Work expressly allowed after approval | TR03; 12.2 Table 12.2 HH12; printed p478; PDF p519

> *"Additional targeted survey visual inspection will be conducted in unsurveyed portions of the project area before and/or after project approval."*

E337 note: The table identifies 20 locations not inspected due to access, plus possible additional locations.
E337 additional reference: Related location in the same report: §12.4.1, p485 (PDF526).

E338 Geotechnical/vibration advice and construction limits for works near Timor Caves remain future

Details left for later design, delivery or operation | TR03; 12.2 Table 12.2 HH13; printed p478; PDF p519

> *"EnergyCo will seek geotechnical and vibration advice to inform the construction vibration limits to be applied to works on Sergeants Gap Road to avoid vibration impacts to Timor Caves (I214—Upper Hunter LEP 2013). Construction works will be designed to not exceed these vibration limits (as detailed in the NVIA commitment NV6, refer to Section 16 and Technical Report 9 of the EIS)."*

E338 note: Commitment is to design works not to exceed the future limits; table timing Construction.

E339 Detailed historical heritage methodologies and management refinements are expressly finalised after approval

Work expressly allowed after approval | TR03; 12.3.1 Historical Heritage Management Plan; printed p479; PDF p520

> *"The HHMP will be finalised following project approval and, in addition to the matters outlined above, will address all relevant conditions of approval. Importantly, the HHMP will provide detailed methodologies for the implementation of the management measures outlined below. As such, the management methods outlined in Section 12.3.2 to Section 12.4 below are intended to establish management commitments that will be refined in the HHMP including consideration of further project design definition."*

E339 note: Heritage NSW consultation and current management commitments are stated.

E340 The process for new no-impact areas is to be set out after approval

Work expressly allowed after approval | TR03; 12.3.3.1 Assessing Further Opportunities for Avoidance; printed p480; PDF p521

> *"The HHMP will set out the process for identifying, documenting and managing no-impacts areas following project approval."*

E340 note: Existing no-impact areas are already identified.

E341 Investigation/assessment commitments not completed before approval may be addressed afterwards

Work expressly allowed after approval | TR03; 12.4 Further Investigation and Assessment; printed p484; PDF p525

> *"Further investigation and assessment would be undertaken across the assessment and post-approval stages of the project, subject to access being available. This section aims to clarify at which stage the commitments would be addressed, where known. However, given that the progression of these works may require additional land access and that timing is uncertain, the general principle is that any commitments not achieved prior to project approval will be addressed post-approval under the provisions of a HHMP."*

E341 note: Access constraints and uncertain timing are the stated reasons; an addendum is proposed to update the requirements.

Technical Report 4 | **Social impacts**

E342 Full assessment of Camp 3 and Camp 1 Alternate is postponed to the submissions/amendment stage

Information promised for a Submissions or Amendment Report | TR04; 1.2.1.8 Workforce Accommodation Camps; printed p6; PDF p26

> *"Full assessment of the proposed locations for Camp 3 and Camp 1 Alternate will be undertaken as part of the Submissions Report/Amendment Report."*

E342 note: This sentence promises later assessment during the determination process; it is not by itself evidence of post-approval assessment.

E343 Project biosecurity strategies remain to be developed

Details left for later design, delivery or operation | TR04; 5.2.2.2 Biosecurity Management Approach; printed p112; PDF p132

> *"A Biosecurity Management Plan will be developed for the project that will consider all potential biosecurity risks and identify appropriate strategies to prevent, eliminate or minimise risks."*

E343 note: Potential risks are discussed and example controls are identified; the issue is the missing detailed plan.

E344 Property-specific access, construction timing and farm safeguards will be resolved in Property Management Plans

Details left for later design, delivery or operation | TR04; 5.2.2.2 Management Approach; printed p112; PDF p132

> *"Biosecurity measures will also be considered in the development of Property Management Plans that will be developed for the construction period, with inputs from landholders as to how they use their land for farming and business activities to minimise the impact of the construction activities on operations wherever possible. To minimise impacts on livestock grazing, Property Management Plans will include requirements to communicate programmed construction activities and incorporate appropriate access arrangements in consultation with landholders. Stakeholders recognised the importance of ongoing engagement throughout the construction period, as well as scheduling works around sensitive agricultural periods, while preserving paddock usability, access, and the safe movement of livestock and machinery, which will also be a consideration within these Plans."*

E344 note: The report expressly provides for landholder input and consultation.

E345 The mapped impact on koala habitat will be refined in detailed design

Details left for later design, delivery or operation | TR04; 5.2.6 Management Approach; printed p132; PDF p152

> *"Specifically related to koala habitat, the revised corridor has reduced the mapped koala habitat impacted by the project area, which will be further refined in the detailed design phase."*

E345 note: The passage states that the revised corridor has reduced mapped koala habitat impacts.

E346 Measures in the Biodiversity Management Plan are to be developed before construction

Details left for later design, delivery or operation | TR04; 5.2.6 Management Approach; printed p132; PDF p152

> *"A Biodiversity Management Plan will be developed prior to the commencement of construction to clearly identify measures to reduce impacts on native flora and fauna."*

E346 note: The paragraph goes on to give examples of animal checks, retained habitat, refuge poles and tree retention.

E347 Noise mitigation strategies are to be determined in a plan during detailed design

Details left for later design, delivery or operation | TR04; 5.2.7.1 Management Approach; printed p135; PDF p155

> *"The construction mitigation strategies to reduce noise impacts would be determined as part of a Noise and Vibration Management Plan (NVMP) detailing the mitigation measures and strategies prepared during detailed design of the project, however measures would include an out of hours work protocol, use of quieter equipment where possible, and operation of machinery in a manner to reduce noise levels."*

E347 note: Examples are already proposed, including out-of-hours protocols and quieter equipment.

E348 The traffic plan and possible additional plans for high risk activities, locations and temporary works are to be developed

Details left for later design, delivery or operation | TR04; 5.2.7.2 Management Approach; printed p138; PDF p158

> *"A Traffic and Transport Management Plan will be developed for the project which will include measures aligned with those identified by stakeholders to ensure the safety of road users, including but not limited to staging OSOM vehicle movements around school bus operations and to minimise impacts on the road network, safety measures including public notification periods for the movement of OSOM vehicles and temporary infrastructure works to accommodate the movement of OSOM vehicles, traffic control measures and stakeholder coordination. Additional traffic or transport management plans may be prepared for specific high risk construction activities or locations, including temporary works, where site specific traffic controls are required to maintain safety. All plans will be developed in consultation with relevant authorities and industries to ensure impacts are managed and minimised."*

E348 note: The passage describes intended contents and consultation; it does not say every traffic impact is unassessed.

E349 Workforce skills initiatives and local contracting opportunities are left to a plan before construction

Details left for later design, delivery or operation | TR04; 5.2.9.1 Management Approach; printed p150; PDF p170

> *"A Local Industry Participation Plan will be developed for the project prior to construction, to outline the initiatives, activities, and strategies the project will have in place to develop the skills required for the project within the regional labour force and to maximise opportunities for local and reginal employment, and businesses in secure contracting opportunities. This Plan will be informed by ongoing consultation with local councils, economic development organisations and local chambers of commerce."*

E349 note: Ongoing consultation is expressly promised.
E349 additional reference: Related location in the same report: Table 7.1 SO3, printed pp199–200 (PDF219–220).

E350 Measures, monitoring performance targets and adaptive management protocols are to be set in the SIM Plan

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO1; printed p197; PDF p217

> *"The SIM Plan will outline measures to address or manage social impacts and opportunities assessed as having high or medium significance and will describe monitoring arrangements inclusive of performance targets for each measure. Adaptive management protocols or processes will also be outlined in the event that the intended outcomes of the measures are not realised."*

E350 note: Table timing is Pre-construction / Construction.

E351 A dedicated community wellbeing strategy is still to be prepared

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO1; printed p197; PDF p217

> *"A dedicated Community Wellbeing Strategy, to be prepared and implemented to identify, monitor and manage potential impacts on community health, wellbeing and social cohesion associated with construction and operation of the project."*

E351 note: The table lists matters the strategy would consider, rather than supplying the final strategy.

E352 A dedicated Landholder Engagement Strategy is to be included in the revised CSEP

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO2; printed p199; PDF p219

> *"The revised CSEP would also include a dedicated Landholder Engagement Strategy which would be implemented to guide ongoing and consistent engagement with landholders affected by property access, land acquisition and construction activities. This Strategy would seek to manage land access and property interactions in a transparent, consistent and landholder-centred manner for project-affected and proximal landholders."*

E352 note: The table lists proposed content and promises property-specific arrangements.

E353 Employment/procurement targets and skills-gap responses are to be identified later

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO3; printed p199; PDF p219

> *"The Local Industry Participation Plan would be prepared and implemented to facilitate local worker and business participation in the project. The Plan would seek to: • identify targets for local employment and procurement • identify skills gaps to align training provision with project needs"*

E353 note: Timing is Detailed design / Pre-construction / Construction.

E354 The Workforce Management Plan will set measures for camp establishment and operation

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO4; printed p200; PDF p220

> *"The Workforce Management Plan would be prepared and implemented to manage workforce behaviour, wellbeing and integration with local communities, and to minimise potential social impacts associated with workforce presence during construction and operation. The Plan would also include management measures relating to the establishment and operation of workforce accommodation camps in order to ensure minimisation of impacts on local communities, services and regional housing markets."*

E354 note: The table supplies a scope for the plan; it is not silent about intended safeguards.

E355 Arrangements for short-stay accommodation and strategies for camp health provision remain to be outlined

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO4 continued; printed p201; PDF p221

> *"outline workforce accommodation arrangements for workers who will require housing in short-stay accommodation in the region • outline strategies to ensure workforce accommodation camps provide sufficient health services to meet the needs of workers while on shift, including at a minimum camp-based first aid and medic personnel, and facilitated access to General Practitioners via Telehealth services, to ensure that the project workforce has no reliance is placed on local health services"*

E355 note: Minimum first aid, medic personnel and facilitated telehealth are already specified. Table text contains the grammatical wording reproduced in the quote.

E356 Amenity, recreation, communications and camp transport arrangements are to be set by the workforce plan

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO4 continued; printed p201; PDF p221

> *"include measures to support workforce wellbeing, manage fatigue and travel demands such as the provision of appropriate on-site amenities, recreation facilities and access to communication services at workforce accommodation camps • address access and transport arrangements to/from the workforce accommodation camps to reduce pressure on local roads and services"*

E356 note: These are proposed contents of a future plan; no precise layout or transport schedule is provided by this passage.

E357 Monitoring, review and camp complaint-response mechanisms are to be established

Details left for later design, delivery or operation | TR04; 7.1 Table 7.1 SO4 continued; printed p202; PDF p222

> *"outline monitoring arrangements to enable responsive management of unanticipated impacts and would be regularly reviewed to ensure effectiveness over the life of the project • establish and implement mechanisms to receive, record, monitor and respond to community suggestions, complaints and concerns relating to workforce accommodation camps and workforce behaviour, including regular review of feedback to identify emerging issues and inform adaptive management measures where required."*

E357 note: This is a proposed management commitment, not proof that complaints will be ignored.

Technical Report 5 | **Landscape and visual**

E358 Final siting

Work expressly allowed after approval | TR05; 1.7.1 Assessment Assumptions; printed p19; PDF p20

> *"following approval, detailed design would refine the final siting of infrastructure"*

E359 Structures and methods

Details left for later design, delivery or operation | TR05; 1.7.1 Assessment Assumptions; printed p19; PDF p20

Paraphrase: Structural parameters and methods remain provisional.

E360 Batching sites

Details left for later design, delivery or operation | TR05; 14.4 Workforce Accommodation Camps and Laydowns; printed p179; PDF p185

Paraphrase: Batching locations omitted from viewshed modelling.

E361 New camps

Information promised for a Submissions or Amendment Report | TR05; 14.4.1 Overview; printed p179; PDF p185

Paraphrase: Camp 3/1 Alternate assessments await amendment.

E361 additional reference: Related location: 2.2 Project Elements; printed p22; PDF p23.

E362 Camp/laydown layouts

Details left for later design, delivery or operation | TR05; 14.4 Workforce Accommodation Camps and Laydowns; printed p180; PDF p186

Paraphrase: Camp/laydown layouts await design.

E363 Nemingha design

Details left for later design, delivery or operation | TR05; 14.6 Nemingha Maintenance Facility; printed p191; PDF p197

Paraphrase: Nemingha finishes and screening remain provisional.

E364 Communications review

Unresolved details with no stated completion stage | TR05; 14.5 Communications infrastructure and utilities; printed p191; PDF p197

Paraphrase: Communications assets may need review; hut siting remains provisional.

E365 Visual conclusions

Details left for later design, delivery or operation | TR05; 14.7 Summary of ancillary infrastructure impacts; printed p192; PDF p198

Paraphrase: Ancillary visual conclusions await confirmation.

E366 Ancillary lighting

Details left for later design, delivery or operation | TR05; 15.1 Overview of Night Lighting Assessment; printed p193; PDF p199

Paraphrase: Lighting specifications await design.

E367 Private receiver mitigation

Details left for later design, delivery or operation | TR05; 16.3 Response to Visual Performance Objectives; printed p197; PDF p204

Paraphrase: Mitigation awaits landholder consultation.

E368 Screening planting

Details left for later design, delivery or operation | TR05; 16.3 Response to Visual Performance Objectives; printed p197; PDF p204

Paraphrase: Planting details await consultation.

E369 Rouchel Brook

Details left for later design, delivery or operation | TR05; 17.0 Summary of Residual Impacts and Table 47 LV9; printed p200; PDF p207

Paraphrase: Rouchel Brook tower refinements await review.

E369 additional reference: Related location: Table 47 LV9; printed p203; PDF p210.
E369 additional reference: Related location: 19.0 Conclusion; printed p206; PDF p213.

E370 Tower design

Details left for later design, delivery or operation | TR05; Table 47 LV3; printed p202; PDF p209

Paraphrase: Tower form and siting await review.

E371 Planting layouts

Details left for later design, delivery or operation | TR05; Table 47 LV4; printed p202; PDF p209

Paraphrase: Screening layouts await landholder discussion.

E372 Sensitive landscapes

Details left for later design, delivery or operation | TR05; Table 47 LV6; printed p203; PDF p210

Paraphrase: Sensitive views await design review.

E373 Roadside screening

Details left for later design, delivery or operation | TR05; Table 47 LV11; printed p203; PDF p210

Paraphrase: Roadside planting requires authority confirmation.

Technical Report 5 | **Visual assessment appendices F to K**

E374 Provisional simulations

Details left for later design, delivery or operation | TR05FK; Appendices G and H individual assessments; printed p429 and others; PDF p21, 26, 35, 41, 46, 48, 50, 52, 56, 58, 61, 74, 77, 84, 86, 88, 92, 96, 102, 110, 115, 119, 122, 127, 138, 145, 152, 158

Paraphrase: Twenty-eight pages repeat provisional-design caveats.
E374 note: One issue; 28 occurrences.
E374 additional reference: Related location: ; printed p429, 434, 443, 449, 454, 456, 458, 460, 464, 466, 469, 482, 485, 492, 494, 496, 500, 504, 510, 518, 523, 527, 530, 535, 546, 553, 560, 566.

Technical Report 6 | **Agriculture**

E375 Energy-hub soil capability field validation was not completed due to access

Unresolved details with no stated completion stage | TR06; 3.4.1 General approach; printed p28; PDF p29

> *"A land and soil survey was proposed at the energy hub sites to validate the mapped LSC (OEH, 2012) of the project area. However, this investigation was unable to be completed due to a lack of land access. The investigation is unlikely to change the outcome of the assessment due to the relatively small area involved (438 hectares of agricultural land across the operational footprint)."*

E375 note: The author considers this unlikely to change the assessment outcome because of the relatively small area; no completion timing is stated.

E376 Property access arrangements, work notifications and sensitive agricultural periods are to be resolved through plans

Details left for later design, delivery or operation | TR06; 5.1.1 General comments; printed p49; PDF p50

> *"To minimise potential impacts, property management plans will be prepared in consultation with affected landholders to identify access arrangements, protocols to regularly communicate programmed construction works, and identifying sensitive agricultural periods and locations, such as lambing, calving and foaling times and paddocks."*

E376 note: Consultation with affected landholders is stated.
E376 additional reference: Related location in the same report: Table 9-1 AG3, pp78–79 (PDF79–80).

E377 Tower-by-tower helicopter use is left to the principal contractor in detailed design

Details left for later design, delivery or operation | TR06; 5.6.1 Disturbance; printed p53; PDF p54

> *"However, the use of helicopters will need to be assessed on a tower-by-tower basis in the detailed design phase by the principal contractor."*

E377 note: The report identifies a broad likely region and discusses livestock noise effects.

E378 Use of airport helipad locations remains subject to consultation and agreement

Unresolved details with no stated completion stage | TR06; 5.6.1 Disturbance; printed p53; PDF p54

> *"Helipads are likely to be established at each of the laydown areas plus at Crawney Road North Timor, Tamworth Regional Airport and Armidale Regional Airport (subject to prior consultation and agreement with the airports and their relevant stakeholders)."*

E378 note: The locations are indicative and consultation is expressly required.

E379 Whether drones will be used for certain construction activities is unknown

Unresolved details with no stated completion stage | TR06; 5.6.1 Disturbance; printed p53; PDF p54

> *"It is not known whether drones would be used for any construction activities such as surveys, weed management, and landscaping."*

E379 note: The report separately states drones or helicopters may be used for stringing.

E380 Avoidance or relocation of stock handling facilities is left to detailed design

Details left for later design, delivery or operation | TR06; 5.6.3 Other impacts; printed p54; PDF p55

> *"There may be some impact on livestock movement and husbandry activities if stockyards and loading facilities are located within the disturbance footprint. In these cases, facilities may have to be relocated. Where practicable, these types of facilities will be avoided in the detailed design phase."*

E380 note: Avoidance is qualified by where practicable.

E381 Additional temporary and permanent access-track locations are to be confirmed with landholders

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG1; printed p78; PDF p79

> *"The location of any additional access tracks (temporary and permanent) will be confirmed in consultation with landholders to minimise impacts on agricultural activities. Where new permanent tracks are required, a single access track will be designed to serve both temporary and permanent purposes, where possible."*

E381 note: Timing is Detailed design and construction; where possible a single track serves both purposes.

E382 Avoidance of impacts to cropping areas, working spaces, farm dams and high biosecurity risk areas is left to further landholder consultation before relevant works

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG2; printed p78; PDF p79

> *"Where the positioning of transmission line structures and other associated permanent structures will impact: • cropping land • areas used for set up and pack up of agricultural equipment, entry points and turning areas • farm dams • locations of high biosecurity risk. Consultation will be undertaken with the affected landholder to identify opportunities to avoid or minimise these impacts, where practicable, prior to the commencement of relevant works which will impact the applicable area, equipment and/or property infrastructure."*

E382 note: Avoidance/minimisation is qualified by where practicable; this is not a guarantee of avoidance.

E383 Plans will later set access, timing/location of works, agricultural activities and infrastructure adjustments

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG3; printed p78; PDF p79

> *"Individual property management plans will be developed in consultation with each landholder directly affected by construction activities. The intent of the plans is to provide a flexible approach which balances the needs of existing agricultural operations and construction activities. The plans will address relevant matters including: • access arrangements and protocols • proposed timing and location of construction works, particularly where some restriction on vehicular, equipment, grazing or livestock movements will be necessary • grazing and cropping activities on and adjacent to the*

disturbance footprint during the construction period • farm infrastructure arrangements • any required adjustments to property infrastructure (fences, access tracks, etc)"

E383 note: The plan seeks a flexible balance between construction and agriculture and promises consultation; continuation on p79 adds livestock, rehabilitation and biosecurity.

E384 Property plans need only be developed before works affecting the particular property

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG3 continued; printed p79; PDF p80

"Property management plans will be developed prior to the commencement of relevant works which will impact the applicable property, activity, equipment and/or property infrastructure. The requirements of the plans will be adhered to and implemented throughout the construction period."

E384 note: The sentence does not expressly say post-approval; timing is inferred from the project framework.

E385 Property-specific biosecurity controls, monitoring and organic-farm risks are to be set in future plans

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG5 continued; printed p80; PDF p81

"Property-specific biosecurity management plans will also be developed. The property-specific biosecurity management plans will address the various protocols and matters including the following: • weed management controls, including inspection and cleaning of plant and equipment, and management of earthworks and clearing activities … For example, appropriate measures will be implemented with respect to foot and mouth disease to control any risk of introduction of the pathogen because of project activities • property-specific controls consistent with property biosecurity plans where they are in place (agreed protocols will be documented in the biosecurity management plan) … • consultation with the owners of organic certified properties will be carried out to identify the property-specific risks and controls required to be implemented. The property-specific biosecurity management plans will be prepared in consultation with relevant local council biosecurity officers in relation to the distribution of important weeds and the location of high biosecurity risk areas."

E385 note: The EIS lists required topics and consultation with council biosecurity officers.

E386 Camp design, agricultural buffers and management arrangements are left to further design/consultation

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG8; printed p81; PDF p82

"Accommodation camps will be designed and located to minimise potential land use conflicts with landholders undertaking agricultural practices nearby. They will be located away from cropping areas and farm infrastructure, if possible, with an appropriate buffer. Consultations will be undertaken with neighbouring landholders and a management plan for the accommodation developed."

E386 note: The measure is timed Construction and uses if possible for separation from cropping/farm infrastructure.

E387 Operational fencing and gate arrangements are to be determined later

Details left for later design, delivery or operation | TR06; 9 Table 9-1 AG9; printed p81; PDF p82

"Fencing and access arrangements, such as locked gates and requirements for opening and closing of gates, will be determined in consultation with landholders."

E387 note: Table timing is Operation; repairs are also promised.

Technical Report 7 | **Traffic and transport**

E388 Detailed TTMP after construction methodology, staging and contractor arrangements are confirmed

Details left for later design, delivery or operation | TR07; Section 4.3.3 Table 4-2 TTMP; printed p29; PDF p45

> *"A detailed Traffic and Transport Management Plan has not been prepared as part of this TTIA, as it is a delivery phase document developed once the construction methodology, staging and contractor arrangements are confirmed. Consistent with standard practice, the TTIA identifies traffic impacts and high-level mitigation measures, with a detailed TTMP to be prepared and approved prior to construction in consideration of the mitigation measures and any conditions of approval, should the project be approved."*

E388 note: Expressly says the TTMP has not been prepared for the TTIA and would be prepared and approved prior to construction, taking account of approval conditions if approved.

E389 Further site-specific assessment to determine access treatment

Unresolved details with no stated completion stage | TR07; Section 4.5.6 Determination of construction routes; printed p35; PDF p51

> *"A limited number of locations have therefore been identified for further assessment to determine the appropriate access treatment based on site specific conditions."*

E390 Refuelling range, locations and arrangements

Details left for later design, delivery or operation | TR07; Section 4.5.8 OSOM transportation strategy; printed p38; PDF p54

> *"Refuelling requirements for OSOM movements would be addressed through standard industry practices, including the use of auxiliary fuel tanks and pre-arranged refuelling locations, and would be managed as part of detailed haulage planning and permitting processes. Accordingly, assessment of refuelling range and location has not been undertaken at the EIS stage."*

E390 note: Report says these are operational and do not influence network-level capacity, safety or performance; retain that stated rationale.

E391 Confirmation of OSOM transportation hours with TfNSW and councils

Unresolved details with no stated completion stage | TR07; Section 4.5.8 OSOM transportation strategy Assumptions; printed p38; PDF p54

> *"The proposed transportation hours are preliminary and would need to be confirmed through consultation with TfNSW and the relevant LGAs once the load and transport details are further refined."*

E392 Further traffic assessment of Camp 3 once location confirmed

Unresolved details with no stated completion stage | TR07; Section 6.2.6 Workforce accommodation and ancillary facility locations; printed p75; PDF p91

> *"The final location of Camp 3, once confirmed, would be subject to further assessment and would be required to comply with the performance outcomes assessed in this report."*

E392 note: Report separately says assumed vicinity of Barry; exact milestone for this assessment is not stated here.

E393 Final vehicle configurations and delivery schedules through regulatory processes

Details left for later design, delivery or operation | TR07; Section 6.4.2 OSOM routes; printed p81; PDF p97

> *"Final OSOM vehicle configurations and delivery schedules would be confirmed through the relevant regulatory approval processes, undertaken in consultation with TfNSW, the NHVR and the applicable local councils."*

E394 Contingency temporary OSOM access design, controls and approvals

Details left for later design, delivery or operation | TR07; Section 6.4.2 OSOM routes Uralla to Walcha; printed p87; PDF p103

> *"This contingency access would be subject to detailed design, environmental controls, and approval by TfNSW and the NHVR prior to use."*

E394 note: Conditional contingency route, not an unconditional final route choice.

E395 Equipment specifications and logistics during design/procurement

Details left for later design, delivery or operation | TR07; Section 6.5.7 OSOM movement volumes; printed p95; PDF p111

> *"These estimates reflect the equipment configuration at the time of assessment and may vary during later design and procurement stages as equipment specifications and transport logistics are finalised."*

E395 note: The passage places equipment and logistics decisions in later design and procurement stages, without expressly dating them against determination.

E396 Final property access treatment types with landholders

Details left for later design, delivery or operation | TR07; Section 6.7.4 Impact to intersections private property access; printed p110; PDF p126

> *"Final treatment types for private property access points would be confirmed during design development in consultation with landholders, with an overview of all assessed intersections provided in Appendix G."*

E397 Final need, extent and design of individual road treatments by Network Operator

Details left for later design, delivery or operation | TR07; Section 6.7.5 OSOM road upgrades; printed p114; PDF p130

> *"The final need, extent and design of individual treatments would be confirmed during subsequent stages of the project, informed by detailed vehicle procurement, route surveys and further transport analysis undertaken by the Network Operator in consultation with TfNSW, Councils and the NHVR."*

E397 note: Explicitly assigns further analysis to the Network Operator in consultation with TfNSW, councils and NHVR.

E398 Vehicle specification, load configuration and route plans following operator appointment

Details left for later design, delivery or operation | TR07; Section 6.7.5 Impacts of OSOM vehicles summary; printed p120; PDF p136

> *"Final OSOM vehicle specifications, load configurations and route plans would be further refined once the transport operator has been appointed, with the Transport Management Plans prepared prior to haulage operations would provide detailed arrangements for the proposed haulage activities."*

E399 OSOM frequencies and schedules confirmed by Contractor/Transporter

Details left for later design, delivery or operation | TR07; Section 6.7.5 Impacts of OSOM vehicles summary; printed p120; PDF p136

> *"Final OSOM load frequencies and scheduling would be confirmed by the Contractor/Transporter as the construction program is refined, with detailed planning undertaken to optimise delivery timing and minimise impacts on the surrounding road network."*

E400 Temporary or permanent relocation of bus facilities

Details left for later design, delivery or operation | TR07; Section 6.7.12 public transport; printed p128; PDF p144

> *"As the detailed design is refined temporary or permanent relocation of bus facilities may be required. This would occur in consultation with the relevant authority and ensure that an appropriate facility is in place before the existing one is unavailable."*

E400 note: Conditional on relocation being required; promises consultation and replacement before loss of existing facility.

E401 Confirmation of routes, entry/exit points, transport times, safety measures, emergency access and incident response

Details left for later design, delivery or operation | TR07; Table 9-1 traffic management; printed p168; PDF p184

> *"A Traffic and Transport Management Plan (TTMP) would be prepared as part of the Construction Environmental Management Plan (CEMP) and would include: ■ Confirmation of haulage routes ■ Access to the project area, including entry and exit locations ■ Preferred times of transport to and from the project area to minimise impacts on the road network ■ Measures to minimise the number of workers using private vehicles ■ Management of OSOM vehicles ■ Site specific traffic control measures (including signage) to manage and regulate traffic movement ■ Relevant traffic safety measures, including driver induction, training, safety measures and protocols ■ Requirements for, and placement of, traffic barriers ■ Requirements and methods to consult and inform the local community of impacts on the local road network due to the development-related activities ■ Consultation with Transport for NSW, National Heavy Vehicle Regulator (NHVR) and local Council on the traffic management plans ■ Consultation with the emergency services to ensure that procedures are in place to maintain safe, priority access for emergency vehicles ■ A response plan for any construction related traffic incident ■ Monitoring, review and amendment mechanisms ■ Individual traffic management requirements at each stage of construction."*

E402 Final OSOM route, escorts, movement windows, rest areas, load dimensions and temporary works

Details left for later design, delivery or operation | TR07; Table 9-1 Heavy vehicles; printed p169; PDF p185

> *"A Traffic and Transport Management Plan (TTMP) would be prepared and govern OSOM vehicle movements including: ■ Identification of the final OSOM route ■ Measures to provide an escort for the loads ■ Times of transporting to minimise impacts on the road network ■ Location of rest areas and required rest stops along the route ■ The maximum parameters of the materials to be transported to and from the project area ■ Communication strategy and liaising with emergency services and police ■ Any minor temporary civil infrastructure work (vegetation trimming, relocation of roadside assets (e.g. signs or barriers), and minor intersection modifications) which may be required to accommodate OSOM movements ■ Safety measures to directly address OSOM vehicles passing through towns and include a 48- hour minimum public notification protocol of the presence of OSOM vehicles ■ Consultation with the relevant Council on the TTMP and proposed OSOM movements prior to the commencement of works."*

E403 Final treatment selection by site-specific design and traffic planning

Details left for later design, delivery or operation | TR07; Section 9.3 Schedule of road upgrades; printed p173; PDF p189

> *"Final treatment selection would be confirmed through site-specific design and traffic management planning."*

E404 Verification of road ownership in detailed design

Details left for later design, delivery or operation | TR07; Appendix D Existing road network descriptions table note; printed p209; PDF p225

> *"Road ownership may be private or unconfirmed and would be verified during detailed design in consultation with relevant authorities and landowners."*

E405 Unshown fence line or boundary has not yet been determined

Unresolved details with no stated completion stage | TR07; Appendix H local road intersection EIS sketches note 2; unnumbered appendix drawing; PDF p294

> *"IF PROPERTY FENCE LINE OR BOUNDARY IS NOT SHOWN, IT IS NOT YET DETERMINED."*

E405 note: Visually verified note order on PDF294; same standard note repeated on the listed drawings.
E405 additional reference: Repeated drawing note on PDF pages 294, 295, 299, 300, 302, 303, 304, 305, 306, 307, 308, 314, 315, 316, 317, 318, 319, 320, 321, 322, 323, 326, 327, 328, 329, 330, 331, 334.

E406 Temporary works and construction methods are contractor responsibility

Details left for later design, delivery or operation | TR07; Drawing NEREZRUA-AURC-NWW-GN-SKE-600003 note 10; unnumbered appendix drawing; PDF p338

> *"THESE DRAWINGS DO NOT DETAIL TEMPORARY WORKS. CONSTRUCTION METHODS AND TEMPORARY WORKS ARE THE RESPONSIBILITY OF THE CONTRACTOR."*

E407 OSOM pavement profile and details

Unresolved details with no stated completion stage | TR07; Drawing NEREZRUA-AURC-NWW-GN-SKE-600003 legend; unnumbered appendix drawing; PDF p338

> *"OSOM PAVEMENT (PAVEMENT PROFILE AND DETAILS TO BE CONFIRMED"*

E408 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500009; unnumbered appendix drawing; PDF p381

> *"AUSGRID - POLE, STREET LIGHT AND CONNECTING NETWORK POTENTIALLY IMPACTED BY SWEPT PATH. SURVEY TO CONFIRM LOCATION OF POLE. [...] AUSGRID - SURVEY TO CONFIRM HEIGHT OF ELECTRICAL WIRES ROAD CROSSINGS ALONG OSOM ROUTE TO CHECK CLEARANCE."*

E408 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E409 Impact on guardrail and school crossing posts

Details left for later design, delivery or operation | TR07; Drawing NEREZRUA-AURC-NWW-CV-SKE-500010 RS_TRC_21 New England Highway and Charles Street; unnumbered appendix drawing; PDF p382

> *"IMPACT ON EXISTING GUARDRAIL AND SCHOOL CROSSING POSTS TO BE ADDRESSED AT NEXT DESIGN PHASE."*

E409 note: Visually verified drawing callout; sheet 10 of 42, Work in progress.

E410 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500010; unnumbered appendix drawing; PDF p382

> *"OVERHEAD CABLES TO BE ASSESSED [...] CLEARANCE TO OVERHEAD POWER LINES TO BE VERIFIED.*

E410 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E411 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500005; unnumbered appendix drawing; PDF p383

> *"TELSTRA - PIT AND CONNECTING NETWORK POTENTIALLY IMPACTED BY DRAINAGE CHANNEL. SURVEY TO CONFIRM LOCATION. [...] CLEARANCE TO OVERHEAD POWER LINES TO BE VERIFIED"*

E411 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E412 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500006; unnumbered appendix drawing; PDF p384

> *"TELSTRA - ROAD CROSSING POTENTIALLY IMPACTED BY PAVEMENT. SURVEY TO CONFIRM DEPTH [...] TELSTRA - PIT AND CONNECTING NETWORK POTENTIALLY IMPACTED BY EARTHWORKS. SURVEY TO CONFIRM LOCATION."*

E412 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E413 Construction traffic road layout

Unresolved details with no stated completion stage | TR07; Drawing NEREZRUA-AURC-NWW-CV-SKE-500001 IS_WAC_08 Oxley Highway and Central South Hub access; unnumbered appendix drawing; PDF p388

> *"CONSTRUCTION TRAFFIC ROAD LAYOUT TO BE CONFIRMED"*

E414 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500001; unnumbered appendix drawing; PDF p388

> *"ESSENTIAL ENERGY - CLEARANCE TO OVERHEAD ELECTRICAL CABLE TO BE CHECKED [...] TELSTRA - IMPACT TO BE CHECKED PENDING SURVEY."*

E414 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E415 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500024; unnumbered appendix drawing; PDF p389

> *"TELSTRA - PIT AND CONNECTING NETWORK IMPACT TO BE CHECKED PENDING SURVEY [...] TELSTRA - ROAD CROSSING IMPACT TO BE CHECKED"*

E415 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E416 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500025; unnumbered appendix drawing; PDF p390

> *"TELSTRA - IMPACT TO BE CHECKED"*

E416 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E417 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500003; unnumbered appendix drawing; PDF p391

> *"TELSTRA - CABLE LOCATION TO BE CONFIRMED"*

E417 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E418 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500020; unnumbered appendix drawing; PDF p393

> *"OVERHEAD POWER LINES CLEARANCE TO BE VERIFIED. [...] TELSTRA - CONDUIT IMPACT TO BE CHECKED PENDING SURVEY"*

E418 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E419 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500019; unnumbered appendix drawing; PDF p394

> *"TELSTRA - ROAD CROSSING IMPACT TO BE CHECKED PENDING SURVEY"*

E419 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E420 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500011; unnumbered appendix drawing; PDF p395

> *"TELSTRA - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] CLEARANCE TO OVERHEAD POWER LINES TO BE VERIFIED"*

E420 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E421 Inlet and outlet drainage-channel levels

Unresolved details with no stated completion stage | TR07; Drawing NEREZRUA-AURC-NWW-CV-SKE-500012 IS_USC_06 New England Highway and Staces Road; unnumbered appendix drawing; PDF p396

> *"CHANNEL LEVELS AT INLET AND OUTLET TO BE VERIFIED"*

E422 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500012; unnumbered appendix drawing; PDF p396

> *"AARNet - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] TELSTRA - ROAD CROSSING IMPACT TO BE CHECKED"*

E422 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E423 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500013; unnumbered appendix drawing; PDF p397

> *"AARNet - ROAD CROSSING IMPACT TO BE CHECKED."*

E423 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E424 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500014; unnumbered appendix drawing; PDF p398

> *"AARNet - ROAD CROSSING IMPACT TO BE CHECKED [...] TELSTRA - ROAD CROSSING IMPACT TO BE CHECKED"*

E424 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E425 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500015; unnumbered appendix drawing; PDF p399

> *"AARNet - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] TELSTRA - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH."*

E425 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E426 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500016; unnumbered appendix drawing; PDF p400

> *"CLEARANCE TO OVERHEAD WIRES TO BE VERIFIED [...] AARNet - CONDUIT POTENTIALLY IMPACTED BY THE NEW ROAD. SURVEY TO CONFIRM LOCATION AND DEPTH."*

E426 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E427 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500017; unnumbered appendix drawing; PDF p401

> *"CLEARANCE FROM OVERHEAD WIRES TO BE VERIFIED [...] POTENTIAL IMPACT ON EXISTING POWER POLES AND FENCE TO BE VERIFIED [...] ESSENTIAL ENERGY - POWER POLE IMPACT TO BE CHECKED [...] TELSTRA - CROSSING IMPACTED BY NEW ROAD AND WILL REQUIRE RELLOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] TELSTRA - PIT AND CONNECTING NETWORK IMPACTED BY NEW ROAD AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] AARNet - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] TELSTRA - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH."*

E427 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

E428 Utility location, clearance or impact confirmation at the depicted road treatment

Unresolved details with no stated completion stage | TR07; Appendix K drawing NEREZRUA-AURC-NWW-CV-SKE-500018; unnumbered appendix drawing; PDF p402

> *"ESSENTIAL ENERGY - POWER POLE IMPACT TO BE CHECKED [...] AARNet - ROAD CROSSING IMPACTED BY PAVEMENT AND WILL REQUIRE RELOCATION. SURVEY TO CONFIRM LOCATION AND DEPTH. [...] TELSTRA - PIT AND CONNECTING NETWORK POTENTIALLY IMPACTED. SURVEY TO CONFIRM LOCATION AND DEPTH."*

E428 note: Distinct drawing location; quotations are separate callouts joined with an ellipsis, not a continuous sentence.

Technical Report 8 | **Economic impacts**

E429 Three workforce/industry plans are to be developed

Details left for later design, delivery or operation | TR08; 8 Table 8.1 EC1; printed p45; PDF p48

> *"A Local Workforce Development Plan, Local Industry Participation Plan and an Australian Industry Participation Plan will be developed for the project to promote local worker participation. These plans will identify opportunities to develop skills required for the project within the regional labour force."*

E429 note: Timing Detailed design / Construction / Operation; same measure appears in executive summary p10 (PDF13).
E429 additional reference: Related location in the same report: Executive summary p10 (PDF13).

Technical Report 9 | **Noise and vibration**

E430 New camp assessment

Information promised for a Submissions or Amendment Report | TR09; Project description workforce accommodation camps; printed p4; PDF p21

Paraphrase: Full assessments of Camp 3 and Camp 1 Alternate await amendment.

E431 Blasting locations

Unresolved details with no stated completion stage | TR09; 3.4.6 Construction Blasting Approach; printed p16; PDF p33

Paraphrase: Specific blasting locations and their number are unresolved.
E431 additional reference: Related location: 6.1.5 Construction Blasting Impacts; printed p68; PDF p85.

E432 Contractor construction method

Details left for later design, delivery or operation | TR09; 6.1.1 Construction Noise Impacts; printed p42; PDF p59

Paraphrase: Contractors may use methods different from the modelled scenarios.E432 note: Assessment presents conservative scenarios.

E433 Camp siting

Unresolved details with no stated completion stage | TR09; 6.1.1.1 Construction Ancillary Sites; printed p47; PDF p64

Paraphrase: Specific camp locations remain undetermined; noise sources are conservatively positioned.

E434 Helicopter flight paths and tower pads

Details left for later design, delivery or operation | TR09; 6.1.2.2 Aircraft Noise from Flights outside the Construction Ancillary Sites and Transmission Line Project Areas; printed p57; PDF p74

Paraphrase: Flight paths are unknown; aircraft-dependent tower pads await design confirmation.

E435 Blast analysis

Details left for later design, delivery or operation | TR09; 6.1.5.1 Residential Receivers; printed p70; PDF p87

Paraphrase: Detailed blasting analysis awaits confirmed locations and a blasting plan.

E436 Energy hub noise design

Details left for later design, delivery or operation | TR09; 6.2.3 and 7.2 Specific Mitigation NV10; printed p77 and 82; PDF p94, 99

Paraphrase: Hub layout, equipment and barriers await design refinement.

E437 Maintenance facility noise design

Details left for later design, delivery or operation | TR09; 6.2.4 and 7.2 Specific Mitigation NV11; printed p77 and 82; PDF p94, 99

Paraphrase: Maintenance-facility layout and barriers await design refinement.

E438 Construction noise plan

Details left for later design, delivery or operation | TR09; 7.1.1 Construction Noise Mitigation Overview; printed p78; PDF p95

Paraphrase: A future plan will confirm work, equipment, hours, impacts and mitigation.

E439 Fixed noise barriers

Details left for later design, delivery or operation | TR09; 7.2 Specific Mitigation NV1; printed p79; PDF p96

Paraphrase: Hoarding, earth bunds and building placement await design investigation.

E440 Out of hours work protocol

Details left for later design, delivery or operation | TR09; 7.2 Specific Mitigation NV2; printed p79; PDF p96

Paraphrase: A future protocol will govern additional assessments and night-work approval.

E441 Transmission noise reassessment

Details left for later design, delivery or operation | TR09; 7.2 Specific Mitigation NV9; printed p82; PDF p99

Paraphrase: Noise review awaits final line positioning, conductors and property acquisitions.

E442 Operational noise remedies

Details left for later design, delivery or operation | TR09; 7.2 Specific Mitigation NV9; printed p82; PDF p99

Paraphrase: Monitoring after operation begins precedes negotiation of remedies for confirmed exceedances.
E442 note: Contingent remedy after operation begins; existing assessment and design controls precede monitoring.

Technical Report 10 | **Preliminary risk screening**

E443 New camp assessment

Information promised for a Submissions or Amendment Report | TR10; 1.2 Project Description; printed p7; PDF p15

Paraphrase: Camp 3 and Camp 1 Alternate assessments await amendment.

E444 Backup battery chemistry

Unresolved details with no stated completion stage | TR10; 4.3 Key Assumptions and Limitations; printed p23; PDF p31

Paraphrase: Backup battery chemistry is unconfirmed; conservative screening assumptions are used.

E445 Hazardous chemical quantities

Details left for later design, delivery or operation | TR10; 4.3 Key Assumptions and Limitations; printed p23; PDF p31

Paraphrase: Detailed design will confirm stored chemical quantities, which may change.

E446 Chemical packing groups

Unresolved details with no stated completion stage | TR10; 4.3 Key Assumptions and Limitations; printed p23; PDF p31

Paraphrase: Some packing groups are unfinished; conservative thresholds are applied.

E447 Pipeline blasting controls

Details left for later design, delivery or operation | TR10; 6.1 Construction Impacts and Table 6-1 HR4; printed p30–31; PDF p38–39

Paraphrase: If blasting near the pipeline becomes necessary, later noise-management planning will address it.

E448 Gas pipeline electrical hazards

Details left for later design, delivery or operation | TR10; 6.2 Operational Impacts and Table 6-1 HR5; printed p31–32; PDF p39–40

Paraphrase: Later design must quantify electrical pipeline hazards and necessary safeguards.
E448 additional reference: Related location: Executive Summary HR5; printed piv; PDF p6.
E448 additional reference: Related location: Summary HR5; printed p38; PDF p46.

Technical Report 11 | **Aviation**

E449 Airservices review

Unresolved details with no stated completion stage | TR11; 5.1.2 Table 2; 6.4.2; 6.4.3; printed p34 and 68; PDF p36, 70

Paraphrase: Tower details must be supplied for Airservices review; radar and communication impacts await its further assessment.
E449 note: The consultant already predicts no impacts; Airservices confirmation remains a later consultation step.
E449 additional reference: Related location: 6.4.2 Air traffic control radar facilities; printed p68; PDF p70.
E449 additional reference: Related location: 6.4.3 Aviation communication facilities; printed p68; PDF p70.

E450 Conductor marking locations

Unresolved details with no stated completion stage | TR11; 7.1.1 Marking of the transmission line conductors; printed p77; PDF p79

Paraphrase: Affected lines requiring marking will be identified with aerial operators.

Technical Report 12 | **Bushfire**

E451 Full assessment of the newly identified camp locations is to follow the EIS exhibition

Information promised for a Submissions or Amendment Report | TR12; 1.2 Project description: Workforce accommodation camps; printed p3; PDF p14

> *"Full assessment of the proposed locations for Camp 3 and Camp 1 Alternate will be undertaken as part of the Submissions Report/Amendment Report."*

E451 note: The stated stage is the Submissions/Amendment Report, normally before determination. Do not describe this sentence as an explicit post-approval deferral. Section 6.1.3 still describes Camp 3 location as undetermined.
E451 additional reference: Related location: 6.1.3 Camp 3; printed p54; PDF p65.
E451 additional reference: Related location: Table 8.1 BF5; printed p66; PDF p77.

E452 Actual chemical types, amounts and storage locations remain to be further defined

Unresolved details with no stated completion stage | TR12; 5.1.1 Table 5.1: Use and storage of dangerous goods; printed p45; PDF p56

> *"The types, quantities and storage locations of hazardous chemicals would be further defined as the project progresses."*

E452 note: The table gives assumed chemical categories, APZ requirements and storage standards; it says explosives would be transported in minor quantities for immediate use, rather than stored in the project area. No finalisation date is specified.

E453 Local road upgrade designs remain conceptual until detailed design

Details left for later design, delivery or operation | TR12; 5.3 Transmission line impact on emergency egress and evacuation; printed p50; PDF p61

> *"Numerous local roads would be crossed by overhead transmission lines. Some local roads would require upgrade works (current road designs are conceptual until finalised in the detailed design stage)."*

E453 note: The assessment concludes the overhead line crossings would not obstruct evacuation. The deferral relates to final road-upgrade designs, not an assertion that the crossings necessarily impede egress.

E454 Final track locations and the nature of public upgrade works await detailed design and landowner consultation

Details left for later design, delivery or operation | TR12; 5.3 Transmission line impact on emergency egress and evacuation; printed p50; PDF p61

> *"The final location and nature of new access tracks and public upgrade works would be determined at the detailed design stage in consultation with landowners."*

E454 note: The report predicts the completed works will improve access and egress, and explicitly promises consultation with landowners.

E455 The detailed workforce safety system remains to be developed for dispersed worksites, support sites and camps

Details left for later design, delivery or operation | TR12; 6.1.1 Construction workforce bushfire safety risk; printed p52; PDF p63

> *"As construction of the project would be undertaken in bushfire-prone environments, with no shelter-in-place options for many, if not all, worksites, a project workforce bushfire safety system which ensures workers would not be directly exposed to bushfire impact would need to be developed."*

E455 note: The page provides conceptual safety requirements, including fire-danger restrictions, monitoring, warnings and evacuation planning; the omission is the completed project-specific system.
E455 additional reference: Related location: Executive summary: Bushfire risk to the project; printed pii; PDF p5. Additional wording: "For all worksites in the project area, a workforce bushfire safety system which aims to minimise the likelihood of workers being directly exposed to bushfire impact would need to be developed, so that bushfire risks are reduced as low as reasonably practicable (ALARP)."
E455 additional reference: Related location: Table 8.1 BF4; printed p65; PDF p76.
E455 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82.

E456 Final APZ locations depend on later determination of laydown layouts

Details left for later design, delivery or operation | TR12; 6.1.2 Construction ancillary sites; printed p53; PDF p64

> *"The APZ locations will need to be refined when the site layout of the laydown is determined."*

E456 note: The report already specifies BAL targets, recommends APZ dimensions and supplies constraint maps; it is the final placement that remains open.
E456 additional reference: Related location: 6.1.2 Construction ancillary sites; printed p53; PDF p64. Additional wording: "To inform the detailed design stage, SFPP APZ maps have been developed for each construction ancillary site, identifying parts of the construction ancillary site where portable buildings can be located with 10 kW/m2 (1200 K) or lower exposure."

E457 Camp building placement must be resolved through site design to achieve required APZ setbacks

Details left for later design, delivery or operation | TR12; 6.1.3 Project workforce accommodation camps; printed p53; PDF p64

> *"This would be largely achieved through construction ancillary site design such that temporary portable accommodation buildings are located at a sufficient distance inside the compound boundaries that a SFPP APZ (≤10 kW/m2 calculated at 1200 K) can be achieved."*

E457 note: The report supplies setback tables and maps for the identified assessed camps, and specifies the required radiant-heat target.
E457 additional reference: Related location: 6.1.3 Project workforce accommodation camps; printed p53; PDF p64. Additional wording: "Indicative APZs for achieving SFPP (≤10 kW/m2 calculated at 1200 K) setbacks at each workforce accommodation camp area are presented in the tables below."

E457 additional reference: Related location: 6.1.3 Project workforce accommodation camps; printed p55; PDF p66. Additional wording: "To inform the detailed design stage, SFPP APZ maps have been developed for each workforce accommodation camp area, identifying parts of the site where portable buildings (including those which would be used for project workforce accommodation camp areas) can be located with radiant heat flux exposure 10 kW/m2 (1200 K) or lower (workforce accommodation camp SFPP APZ maps are provided in Appendix B."

E458 The camp-specific assessment substitutes a range of vegetation/slope setback criteria for an established Camp 3 location

Unresolved details with no stated completion stage | TR12; 6.1.3: Camp 3 setback table heading; printed p54; PDF p65

> *"Camp 3 – in the vicinity of Barry (as location is not yet determined, a range of criteria are provided)"*

E458 note: The report introduction identifies a recently selected Barry Road option and promises full assessment in the Submissions/Amendment Report. Preserve that qualification rather than treating this older-style table heading as proof that approval will precede assessment.
E458 additional reference: Related location: 1.2 Workforce accommodation camps; printed p3; PDF p14.
E458 additional reference: Related location: Table 8.1 BF5; printed p66; PDF p77. Additional wording: "Camp 3 site will be selected and designed to achieve SFPP APZ compliance."

E459 Final footprints and designs of hubs, substations and switching stations await detailed design

Details left for later design, delivery or operation | TR12; 6.2.4 Exposure to bushfire impact – energy hubs; printed p57; PDF p68

> *"Energy hub and substation/switching station footprints are indicative, and designs would be finalised at the detailed design stage."*

E459 note: The same paragraph recommends BAL 29 and provides preliminary APZ constraints and width tables in Appendix C.

E460 Project access arrangements to address interference with emergency movement are assigned to the Emergency Management Plan

Details left for later design, delivery or operation | TR12; 7 Cumulative impacts; printed p62; PDF p73

> *"Access arrangements contained in the Emergency Management Plan would mitigate the potential impacts of increased heavy construction vehicles, traffic management restrictions, and road works during potential road upgrades on emergency access/egress routes and fire fighting efforts."*

E460 note: This is a future management-plan reliance, not proof that emergency access will necessarily be obstructed. The report also predicts completed access upgrades will assist firefighting.
E460 additional reference: Related location: Executive summary: Cumulative impacts; printed pii; PDF p5. Additional wording: "The Emergency Management Plan will include measures to mitigate the potential impacts of increased heavy construction vehicles, traffic management restrictions, and road works during potential road upgrades on emergency access/egress and fire fighting efforts."
E460 additional reference: Related location: Table 8.1 BF4 continuation; printed p66; PDF p77. Additional wording: "Ensuring access is maintained for emergency vehicles during roadworks"

E461 The detailed prevention plan, activity restrictions, ignition response and work procedures are to be developed before construction

Details left for later design, delivery or operation | TR12; 8 Table 8.1 BF3; printed p64; PDF p75

> *"Prior to commencement of the construction phase, develop and implement a Project Bush Fire Prevention Plan (alternatively, a section in the Construction Environmental Management Plan specifying bushfire prevention measures for all identified potential fire ignition sources) detailing the operational restrictions and procedures for preventing accidental fire ignition during construction,"*

E461 note: This is an excerpt ending at the printed comma because the sentence continues across pages. The mitigation table specifies development before construction, implementation during construction and annual contractor audits. The report describes prescribed plan contents.
E461 additional reference: Related location: Table 8.1 BF3 continuation; printed p65; PDF p76. Additional wording: "In particular the Project Bush Fire Prevention Plan will need to address: – Establishment of a Project 'hot works' management system for implementation during the project. – Smoking prohibition and designated smoking area protocol for project construction stage – Fire-safe work procedure for earthmoving and drilling works – Driving and parking vehicles off formed roads protocol to ensure prevention of accidental fire ignition by contact between vehicle exhausts/hot parts and grass or other vegetative fuels. – Pre-construction identification and preparation of evacuation routes from project construction sites for use in the event of a bushfire threat."
E461 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82. Additional wording: "Establishment of a project 'Hot Works' management system mandated through the project construction works contract system (including minimum standards for fire fighting equipment apparatus and training for personnel performing hot works)"
E461 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82. Additional wording: "Establishment of requirements through the construction works contracts for all outdoor worksites to have a site-specific smoking prohibition and restriction management protocol"

E461 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82. Additional wording: "Establishment of requirements through the construction works contract for a fire-safe work procedure for earthmoving and drilling works to be applied for all earthmoving and drilling work undertaken during the proclaimed BFDP"
E461 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82. Additional wording: "Establishment of a project protocol for fire prevention when driving and parking vehicles off formed roads"

E462 The project emergency system must be prepared, including warning monitoring, activity restrictions, evacuation triggers, responsibilities, refuge locations, routes and contingency routes

Details left for later design, delivery or operation | TR12; 8 Table 8.1 BF4; printed p65; PDF p76

> *"Preparation of an Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) setting out the project system for:"*

E462 note: The table lists required contents and gives the timing as Construction. This does not establish that the plan is required to be prepared only after approval; classify the inferred project-stage timing separately from explicit after-approval wording.
E462 additional reference: Related location: Table 8.1 BF4; printed p65; PDF p76. Additional wording: "Pre-planned triggers for project worksite evacuation in the event of reports of fire incidents or fire warnings"
E462 additional reference: Related location: Table 8.1 BF4; printed p65; PDF p76. Additional wording: "Project responsibilities and arrangements for authorising and supervising worksite evacuations due to bushfire"
E462 additional reference: Related location: Table 8.1 BF4; printed p65; PDF p76. Additional wording: "Pre-planned off-site refuge locations, evacuation routes and contingency routes in the event project worksite evacuation is required"
E462 additional reference: Related location: Table 8.1 BF4 continuation; printed p66; PDF p77.
E462 additional reference: Related location: 6.1.1 Workforce bushfire safety risk; printed p52; PDF p63.
E462 additional reference: Related location: 9.1 Construction phase bushfire risk; printed p71; PDF p82. Additional wording: "Preparation of an Emergency Management Plan that includes bushfire emergency management measures"

E463 Each camp must have a location-specific emergency management plan prepared

Details left for later design, delivery or operation | TR12; 8 Table 8.1 BF5; printed p66; PDF p77

> *"An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for each project accommodation workers camp location."*

E463 note: BF5 also specifies SFPP APZ compliance, ember protection, access-road standards and a 20,000-litre static water supply. Those requirements are available now; the final camp plan is the deferred element.
E463 additional reference: Related location: 6 Assessment of bushfire risk to the project; printed p51; PDF p62.
E463 additional reference: Related location: 6.1.3 Project workforce accommodation camps; printed p55; PDF p66. Additional wording: "The construction workforce bushfire safety system, in particular the bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) as part of the broader Emergency Management Plan, would need to be scoped to cover temporary worker accommodation facilities."
E463 additional reference: Related location: Executive summary: Bushfire risk to the project; printed pii; PDF p5.

E464 Separate emergency management arrangements must be prepared for every project site office

Details left for later design, delivery or operation | TR12; 8 Table 8.1 BF6; printed p66; PDF p77

> *"An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for each project site office."*

E464 note: The same measure already sets ember protection, access standards and BAL 12.5 APZ requirements.

E465 Emergency plans for offices and workshops at energy hubs, Nemingha maintenance facility and Bayswater substation extension remain to be prepared

Details left for later design, delivery or operation | TR12; 8 Table 8.1 BF9; printed p68; PDF p79

> *"An Emergency Management Plan that includes bushfire emergency management measures conforming to the requirements of A Guide to Developing a Bush Fire Emergency Management and Evacuation Plan (NSW RFS, 2014) to be prepared for the offices and workshops."*

E465 note: The measure gives timing as Construction and operation phases and already specifies BAL 29 APZs. This is not an explicit after-approval sentence.

E466 Whether and where wider easements are needed for long spans is to be determined in detailed design

Details left for later design, delivery or operation | TR12; 8.1.2 Easement design; printed p69; PDF p80

> *"These easement widths are for 'typical spans' – wider easement widths may be required for long spans (to be determined at detailed design stage)."*

E466 note: The preceding sentences give typical widths of 70 m for single 500 kV, 120 m for dual 330 kV and 140 m for dual 500 kV; this is an express qualification to those widths.

E467 APZ locations are provisional and require refinement once the site layout is configured

Details left for later design, delivery or operation | TR12; Appendix A.1 Central Hub A laydown areas map note (and repeated panels); unnumbered map, Appendix A.1 Central Hub A laydown areas; PDF p89

> *"Note: These APZ areas are indications of areas that may be constrained subject to specific site layouts and uses. APZ locations will be required to be refined when the site layout is configured."*

E467 note: The identical caveat appears on 7 map panel(s) in this group. This is a repeated source occurrence, not 7 independent design decisions. Detailed APZ criteria and mapped constraints are already supplied.
E467 additional reference: All map references: A.1 Central Hub A laydown areas, A.2 Central South Hub laydown area, A.3 Barry laydown areas, A.4 Timor laydown areas, A.5 Camp 2 laydown areas, A.6 Rouchel laydown area, A.7 Camp 1 laydown area; PDF pages 89–95.

E468 APZ locations are provisional and require refinement once the site layout is configured

Details left for later design, delivery or operation | TR12; Appendix B.1 Camp 1 Inglewood Road map note (and repeated panels); unnumbered map, Appendix B.1 Camp 1 Inglewood Road; PDF p97

> *"Note: These APZ areas are indications of areas that may be constrained subject to specific site layouts and uses. APZ locations will be required to be refined when the site layout is configured."*

E468 note: The identical caveat appears on 4 map panel(s) in this group. This is a repeated source occurrence, not 4 independent design decisions. Detailed APZ criteria and mapped constraints are already supplied.
E468 additional reference: All map references: B.1 Camp 1 Inglewood Road, B.2 Camp 2 Waverly Road, B.3 Camp 4 Central South Hub, B.4 Camp 5 Central Hub A; PDF pages 97–100.

E469 APZ locations are provisional and require refinement once the site layout is configured

Details left for later design, delivery or operation | TR12; Appendix C.1 North Hub construction map note (and repeated panels); unnumbered map, Appendix C.1 North Hub construction; PDF p103

> *"Note: These APZ areas are indications of areas that may be constrained subject to specific site layouts and uses. APZ locations will be required to be refined when the site layout is configured."*

E469 note: The identical caveat appears on 5 map panel(s) in this group. This is a repeated source occurrence, not 5 independent design decisions. Detailed APZ criteria and mapped constraints are already supplied.
E469 additional reference: All map references: C.1 North Hub construction, C.2 Central Hub A construction, C.3 Central Hub B construction, C.4 East Hub construction, C.5 Central South Hub construction; PDF pages 103–107.

E470 APZ locations are provisional and require refinement once the site layout is configured

Details left for later design, delivery or operation | TR12; Appendix D.1 Nemingha maintenance facility map note (and repeated panels); unnumbered map, Appendix D.1 Nemingha maintenance facility; PDF p116

> *"Note: These APZ areas are indications of areas that may be constrained subject to specific site layouts and uses. APZ locations will be required to be refined when the site layout is configured."*

E470 note: This panel repeats the same design qualification used across the facility maps. Detailed APZ criteria and mapped constraints are already supplied.
E470 additional reference: All map references: D.1 Nemingha maintenance facility; PDF pages 116.

E471 APZ locations are provisional and require refinement once the site layout is configured

Details left for later design, delivery or operation | TR12; Appendix E.1 Bayswater substation extension map note (and repeated panels); unnumbered map, Appendix E.1 Bayswater substation extension; PDF p119

"Note: These APZ areas are indications of areas that may be constrained subject to specific site layouts and uses. APZ locations will be required to be refined when the site layout is configured."

E471 note: This panel repeats the same design qualification used across the facility maps. Detailed APZ criteria and mapped constraints are already supplied.
E471 additional reference: All map references: E.1 Bayswater substation extension; PDF pages 119.

Technical Report 13 | **EMF and telecommunications**

E472 Hub security fence

Details left for later design, delivery or operation | TR13; Executive Summary Energy Hubs; printed pIV; PDF p5

Paraphrase: Hub perimeter-fence design remains subject to confirmation.

E473 New camp assessment

Information promised for a Submissions or Amendment Report | TR13; 1.2.2.8 Workforce accommodation; printed p17; PDF p18

Paraphrase: Camp 3 and Camp 1 Alternate assessments await amendment.

E474 EMF model inputs

Details left for later design, delivery or operation | TR13; 3 Input information and aspects of field predictions; printed p26; PDF p27

Paraphrase: Conservative inputs may be updated once transmission-line design is final.

E475 Phasing and conductor clearance

Details left for later design, delivery or operation | TR13; 3 Input information and aspects of field predictions; printed p27; PDF p28

Paraphrase: Alternative final phasing may require increased ground clearance.

E476 330 kV conductor loading

Details left for later design, delivery or operation | TR13; 3 Input information and aspects of field predictions; printed p28; PDF p29

Paraphrase: Unconfirmed loading and conductor assumptions must be reassessed during design.

E477 Public safety telecommunications link

Details left for later design, delivery or operation | TR13; 7.3 Microwave Point to Point Communications; printed p73; PDF p74

Paraphrase: A high-risk Turkey Mountain–Uralla link requires further assessment and mitigation design.

Technical Report 14 | **Surface water**

E478 Confirmed water sourcing arrangements

Details left for later design, delivery or operation | TR14; Section 4.4.1.2 Ability to meet demands; printed p87; PDF p94

> *"Water sourcing arrangements for the project would be confirmed during detailed design."*

E479 Increased water demand during prolonged dry periods

Details left for later design, delivery or operation | TR14; Section 4.4.1.2 Ability to meet demands; printed p87; PDF p94

> *"The potential for increased water demand during prolonged dry periods, particularly for dust suppression activities, will be considered during detailed design stage."*

E480 Design and capacity of camp and office wastewater systems

Details left for later design, delivery or operation | TR14; Section 4.5.1; printed p87; PDF p94

> *"The specifics of the on-site wastewater management system, including its design and capacity, would be determined in the detailed design phase, and will comply with ANZG Volume 3: Primary industries—Rationale and background information, Chapter 4: Irrigation water quality (ANZG, 2018) and the requirements of the Public Health Act 2010."*

E480 note: Includes a commitment to ANZG irrigation water-quality requirements and the Public Health Act; the detailed system remains unresolved.

E481 Assessment and management of excavation dewatering if required

Details left for later design, delivery or operation | TR14; Section 4.5.3; printed p88; PDF p95

> *"If dewatering is required during construction, this would be assessed during the detailed design stage of the project and managed under the SWMP."*

E481 note: Conditional on dewatering being required.

E482 Flood-sensitive tower siting and maintenance scour risks

Details left for later design, delivery or operation | TR14; Section 5.2.1; printed p90; PDF p97

> *"These areas have been flagged for future consideration during detailed design to inform potential tower siting, and for future maintenance to monitor scour risk and drainage infrastructure."*

E483 Final tower designs and locations in relation to waterfront land

Details left for later design, delivery or operation | TR14; Section 5.2.1; printed p90; PDF p97

> *"The final design and locations of the transmission structures will be confirmed during detailed design and construction planning, with consideration of WFL."*

E484 Crossing design, including inundation and ponding

Details left for later design, delivery or operation | TR14; Section 5.2.2; printed p90; PDF p97

> *"Design of the crossing will be prepared during detailed design including consideration of any existing inundation and ponding."*

E485 Bayswater extension interactions with waterfront land

Details left for later design, delivery or operation | TR14; Table 5.3 Bayswater Power Station substation extension; printed p92; PDF p99

> *"To be determined in detailed design. It is noted that the watercourse appears to have been constructed."*

E485 note: Quote is from the table cell for waterfront-land interactions at Bayswater; no claim that all Bayswater impacts are unassessed.

E486 Final Camp 5 location and layout responding to mapped and visible drainage differences

Unresolved details with no stated completion stage | TR14; Table 5.5 Camp 5 Central Hub A Kentucky; printed p92; PDF p99

> *"It is noted that the LPI hydrolines do not match exactly with the drainage paths visible on aerial imagery. The final location and layout of the camp will take this into consideration."*

E487 Bed and bank stability measures and scour protection

Details left for later design, delivery or operation | TR14; Section 5.3.2; printed p93; PDF p100

> *"During the detailed design stage of the project, designs for access tracks, as well as watercourse crossings, will include measures to minimise impacts on bed and bank stability, and, as required, provide scour protection."*

E488 Filling or modification of a first-order watercourse and diversion impacts

Details left for later design, delivery or operation | TR14; Table 5.6 North Energy Hub; printed p94; PDF p101

> *"Construction of the hub would require filling or modification of a defined 1st order watercourse. Potential impacts on diversion of overland flows will need to be considered in detailed design."*

E489 Site drainage and bench raising to address a flow path

Details left for later design, delivery or operation | TR14; Table 5.6 North Energy Hub; printed p94; PDF p101

> *"The flow path will be addressed in detailed design to be managed through site drainage and raising of the bench."*

E490 Overland-flow and downstream sedimentation effects

Details left for later design, delivery or operation | TR14; Table 5.6 North Energy Hub; printed p94; PDF p101

> *"Affects may result on overland flow and sedimentation in downstream dams and watercourse which will need to be considered in detailed design."*

E490 note: Original wording uses "Affects"; retained verbatim.

E491 Management of upslope stormwater runoff at Central Hub A

Details left for later design, delivery or operation | TR14; Table 5.6 Central Hub A; printed p94; PDF p101

> *"Stormwater runoff from upslope of the hub would need to be managed and considered during detailed design."*

E492 Waterfront land associated with Church Gully

Details left for later design, delivery or operation | TR14; Table 5.6 Central Hub B; printed p94; PDF p101

> *"The WFL associated with the 3rd order watercourse would need to be considered in the detailed design."*

E493 Stormwater and flood conveyance along the third-order watercourse

Details left for later design, delivery or operation | TR14; Table 5.6 Central Hub B; printed p94; PDF p101

> *"In addition, stormwater and flood flow conveyance along the 3rd order watercourse will need to be addressed during detailed design."*

E494 Farm-dam removal and loss of runoff detention

Details left for later design, delivery or operation | TR14; Table 5.6 East Hub; printed p95; PDF p102

> *"Removal of the farm dams and associated runoff detention would need to be considered during detailed design to ensure no impacts on downstream properties."*

E494 note: The sentence occurs twice within the East Hub row; this record counts one issue.

E495 Drainage for shallow overland flow at East Hub

Details left for later design, delivery or operation | TR14; Table 5.6 East Hub; printed p95; PDF p102

> *"Site drainage is required to manage this flow and will be addressed as part of detailed design."*

E496 Designs for first and second order tributaries of Bushes Creek

Details left for later design, delivery or operation | TR14; Table 5.8 Timor Crawney Road laydown; printed p96; PDF p103

> *"Stormwater management designs for 1st and 2nd order tributaries of Bushes Creek will need to be considered during detailed design."*

E497 Upslope and first-order watercourse drainage at Albano Road

Details left for later design, delivery or operation | TR14; Table 5.8 Albano Road laydown; printed p96; PDF p103

> *"Stormwater drainage infrastructure for the upslope catchment and the 1st order watercourses will need to be addressed during detailed design."*

E498 Local drainage infrastructure at Camp 1

Details left for later design, delivery or operation | TR14; Table 5.9 Camp 1 Inglewood Road; printed p97; PDF p104

> *"Drainage designs, during detailed design stage, will need to consider appropriate local drainage infrastructure."*

E499 Removal of existing dams and associated flow detention

Details left for later design, delivery or operation | TR14; Table 5.9 Camp 4 Central South Hub Walcha; printed p97; PDF p104

> *"Removal of the existing farm dams, and associated flow detention, needs to be considered in the detailed design stage."*

E500 Bed and bank structure and drainage-related camp issues

Details left for later design, delivery or operation | TR14; Table 5.9 Camp 5 Central Hub A Kentucky; printed p97; PDF p104

> *"Construction, clearing, or filling of any land within 40 m of the high bank in the adjacent watercourses should be avoided, noting that in-situ bed and bank structures should be considered further during detailed design , including prevention of drainage related issues during operation of the camp."*

E501 Drainage systems and localised scour protection

Details left for later design, delivery or operation | TR14; Section 5.7; printed p103; PDF p110

> *"Further detailed design of stormwater management / drainage systems and localised scour protection will be included in the design of project infrastructure."*

E502 Further on-site acid sulfate soil investigations

Details left for later design, delivery or operation | TR14; Section 5.7; printed p103; PDF p110

> *"Although there are discrete areas identified has having potential ASS within the waterbodies, which include areas around Lake Liddell, Bayswater Power Station, and Lake Glenbawn / Hunter River (Aurecon, 2026a), management will be undertaken in accordance with the relevant national and state ASS guidelines, with further on-site investigations undertaken in these areas to inform the detailed designs."*

E503 Detailed water supply strategy as design is refined

Details left for later design, delivery or operation | TR14; Section 5.7; printed p103; PDF p110

> *"EnergyCo proposes to develop a detailed water supply strategy as the project progresses and design details are refined, ensuring that project water demands can be met while minimising impacts on existing water users and protecting water available for the environment."*

E504 Wastewater design and capacity

Details left for later design, delivery or operation | TR14; Table 7.1 SW7; printed p108; PDF p115

> *"The specifics of on-site wastewater management systems, including design and capacity, would be determined in the detailed design phase, and will comply with ANZG Volume 3: Primary industries—Rationale and background information, Chapter 4: Irrigation water quality (ANZG, 2018) and the requirements of the Public Health Act 2010."*

E505 Site protocols, warning triggers, evacuation routes, refuges and no-go zones

Details left for later design, delivery or operation | TR14; Section 7.2 ERP requirements; printed p109; PDF p116

> *"plan flood emergency management to determine site management protocols during flood events that could impact construction or access areas, including: – suitable early warning and communication protocols – triggers for closure, evacuation and recovery – evacuation routes which consider flood hazard zones and designated flood refuge locations – designated 'no go' zones which prohibit access to people and equipment during flood events (e.g. 10% AEP flood event or greater) – emergency response and support – procedures to ensure worker safety for on-site personnel prior to returning to site and recommencing construction or operations."*

E505 note: This is the required content of the future ERP identified on printed p108.

Technical Report 15 | **Flooding**

E506 Full flood assessment of Camp 3 and Camp 1 Alternate

Information promised for a Submissions or Amendment Report | TR15; Section 1.2 workforce accommodation; printed p5; PDF p13

> *"Full assessment of the proposed locations for Camp 3 and Camp 1 Alternate will be undertaken as part of the Submissions Report/Amendment Report."*

E506 note: Expressly linked to a Submissions Report or Amendment Report; do not count as an explicit post-determination deferral.

E507 Detailed access-track flood-immunity assessment

Details left for later design, delivery or operation | TR15; Table 4-3 response 10b Singleton Council; printed p14; PDF p22

> *"A detailed immunity assessment has not been undertaken as: ■ access tracks are minor infrastructure, ■ impacts to flood behaviour are negligible, and ■ detailed design (including immunity levels) will be resolved at the detailed design stage."*

E507 note: Report calls access tracks minor infrastructure and expects negligible flood-behaviour impact; preserve that rationale.

E508 Assessment of protection of Council drainage assets

Details left for later design, delivery or operation | TR15; Table 4-3 response 10b Singleton Council; printed p14; PDF p22

> *"Protection of Council drainage assets is beyond the detail of an EIS of this scale, as such this has not been assessed but would be addressed during detailed design."*

E508 note: The report expressly says this has not been assessed because it is beyond the detail of an EIS of this scale.

E509 Civil design of camp sites

Unresolved details with no stated completion stage | TR15; Section 5.7.1 workforce accommodation sites; printed p28; PDF p36

> *"Civil design of the sites is in development at the time of the EIS therefore it has been conservatively assumed in the modelling that they would be graded to provide flood immunity to the 2% AEP event or alternatively provide an equivalent level of immunity to critical areas."*

E510 Detailed earthworks and detention sizing/configuration

Details left for later design, delivery or operation | TR15; Section 5.7.1 impact mitigation assessment; printed p28; PDF p36

> *"Detailed civil earthworks were not explicitly modelled and were conservatively represented through generalised site filling. Similarly, detention was represented conceptually by limiting discharge volumes from the site. The need for detention, including sizing and design configuration, will be confirmed during detailed design."*

E511 Earthworks and stormwater strategy to confirm impact outcomes

Details left for later design, delivery or operation | TR15; Table 5-9 local drainage and bench design; printed p29; PDF p37

> *"Bench earthworks and site drainage design for the energy hubs and accommodation camps were not explicitly represented in the modelling. The adopted approach assumed the benches were elevated to achieve immunity and the local runoff within the bench areas would discharge at the lowest point around the bench perimeter. The proposed earthworks and stormwater management strategy will require further consideration in detailed design for confirmation of impact outcomes."*

E512 Detention sizing and configuration not yet investigated

Details left for later design, delivery or operation | TR15; Table 5-9 conceptual detention mitigation; printed p30; PDF p38

> *"Flood detention has been proposed in some locations. These were represented conceptually through limiting discharge rather than explicit modelling of storage systems. This is considered appropriate for the EIS stage where mitigation concepts are identified but detailed design (e.g. sizing and configuration) has not yet been investigated."*

E513 Refinement of detailed hydraulic behaviour and mitigation performance

Details left for later design, delivery or operation | TR15; Table 5-10 simplified design representation; printed p30; PDF p38

> *"Civil earthworks, drainage layouts and infrastructure details were not explicitly modelled. This is considered appropriate for an EIS-level assessment. Detailed hydraulic behaviour and mitigation performance will be refined during detailed design."*

E514 Review of wider public-road flood risk if future access concerns arise

Details left for later design, delivery or operation | TR15; Section 8.1.5 hub access roads continuation; printed p77; PDF p85

> *"An assessment of flooding impacts on the wider public road network was not undertaken as part of this study. Should access constraints be identified as a concern during future project development, a more detailed review of the relevant public road connections and associated flood risk could be undertaken during the detailed design phase."*

E514 note: The report says review could occur should access constraints be identified; it is not an unconditional promise.

E515 Further review of elevated-risk crossings against detailed operations

Details left for later design, delivery or operation | TR15; Section 8.1.7 public road upgrades; printed p79; PDF p87

> *"Nevertheless, where crossings are identified as presenting an elevated flood risk, further review during detailed design should consider the impact on detailed operations."*

E516 Suitable site drainage measures and mitigation for concentrated runoff

Details left for later design, delivery or operation | TR15; Section 8.2.2 Bayswater expansion; printed p93; PDF p101

> *"Overall, the proposed substation expansion is not expected to result in any significant adverse impacts on flooding, provided that suitable site drainage measures are incorporated into the detailed design. Some increases in downstream flood level from concentrated runoff from the bench may result however through suitable mitigation, an acceptable impact outcome is likely achievable."*

E517 Further development of flow spreaders and scour protection

Details left for later design, delivery or operation | TR15; 8.2.3 Transmission lines; printed p93; PDF p101

> *"Where excavation is proposed, minor changes in flow direction and levels may result due to the creation of new sags and gullies. This may result in an increase in flood levels and scour risk due to the concentration of flows. These impacts are likely to be localised and minor in nature and would be sufficiently managed through the implementation of measures, such as flow spreaders and appropriate scour protection. These measures would be developed further during detailed design."*

E518 Sizing and configuration of road cross-drainage structures

Details left for later design, delivery or operation | TR15; Section 8.2.5 access roads; printed p98; PDF p106

> *"Detailed design of access roads, including the sizing and configuration of cross- drainage structures, will be undertaken at detailed design stage to manage these effects and minimise impacts on flood behaviour."*

E519 Flood-impact review where track fill/drainage structures are required

Details left for later design, delivery or operation | TR15; Section 8.2.6 access tracks; printed p98; PDF p106

> *"Where a high level of service and/or large cross drainage structures are required, a review of the impact on flooding should be undertaken during the development of the detailed design."*

E519 note: Conditional on fill or drainage structures being required.

E520 Further development of flow spreaders, table drains and scour protection

Details left for later design, delivery or operation | TR15; 8.2.6 Access tracks; printed p98; PDF p106

> *"Where excavation is proposed, minor changes in flow direction and levels may result due to the creation of new sags and gullies. This may result in an increase in flood levels and scour risk due to the concentration of flows. These impacts are likely to be localised and minor in nature and would be sufficiently managed through the implementation of measures, such as flow spreaders, table drains and appropriate scour protection. These measures would be developed further during detailed design."*

E521 Review of road-upgrade flood behaviour and impacts

Details left for later design, delivery or operation | TR15; 8.2.7 Public Road Upgrades; printed p98–99; PDF p106–107

> *"The extent of any flooding impacts would depend on the final road upgrade design, including the amount of widening, earthworks, and drainage modifications required. Potential impacts have not been specifically assessed as part of this study. Where public road upgrades are proposed within flood-prone areas, a review of flood behaviour and potential flooding impacts should be undertaken during detailed design to confirm that any changes remain minor and localised and to identify any drainage, scour protection or mitigation measures that may be required."*

E521 note: The report explicitly says potential public-road upgrade impacts have not been specifically assessed; detailed design review is required for upgrades in flood-prone areas.

E522 Investigation beyond mapped North Hub extents if required

Unresolved details with no stated completion stage | TR15; Section 9.1.1 North Hub; printed p102; PDF p110

> *"Flood mapping undertaken as part of this study is limited to the immediate area surrounding the North Hub and does not extend to the north or west of the site. Accordingly, flood behaviour and access conditions beyond the mapped extents will require further investigation if required."*

E523 Northward evacuation/access route feasibility

Unresolved details with no stated completion stage | TR15; Section 9.3.1 Central Hub B; printed p107; PDF p115

> *"Travelling northwards via Thunderbolts Way towards Uralla may be possible, however this needs further investigation in more detail."*

E524 Local drainage, detention, scour protection, flow realignment and grading

Details left for later design, delivery or operation | TR15; Table 11-1 HF3; printed p125; PDF p133

> *"Any unavoidable flood impacts would be mitigated through localised drainage upgrades, onsite detention, scour protection, flow path realignment or landform grading, as identified during detailed design."*

E525 Flood assessment of critical assets and risks to adjacent property/public safety

Details left for later design, delivery or operation | TR15; Table 11-1 HF4; printed p125; PDF p133

> *"Detailed flood impact assessment is required at detailed design to confirm flood risk to critical project assets or where there is the potential to impact adjacent properties or public safety."*

E526 Access-route risk and response measures

Details left for later design, delivery or operation | TR15; Table 11-1 HF5; printed p125; PDF p133

> *"Flood risk to access routes will be reviewed during detailed design having regard to the proposed design, operational requirements and desired level of service. Where unacceptable risks are identified, appropriate design, maintenance or operational measures will be considered."*

E527 Emergency access review and measures with SES/Council

Details left for later design, delivery or operation | TR15; Table 11-1 HF6; printed p125; PDF p133

> *"Emergency access and flood response requirements will be reviewed during detailed design and operational planning. Where flood risk is identified as a constraint to emergency access, appropriate emergency management measures will be developed in consultation with relevant stakeholders ie. SES and Council."*

E528 Isolation assessment and shelter/access measures for Nemingha maintenance facility

Details left for later design, delivery or operation | TR15; Table 11-1 HF7; printed p125; PDF p133

> *"The potential for flood-related isolation will be assessed during detailed design and operational planning. Where isolation risks are identified, appropriate access, shelter-in-place or operational management measures will be considered."*

E529 Flood-informed layout, setbacks and controls for camps/laydowns

Details left for later design, delivery or operation | TR15; Table 11-1 HF8; printed p125; PDF p133

> *"Flood risk will be considered during site layout at detailed design stage. Where camps, laydowns or ancillary facilities are proposed within flood-prone areas, the need for setbacks, mitigation measures or operational controls will be assessed."*

E530 Additional drainage, scour, maintenance and operating controls at high-risk crossings

Details left for later design, delivery or operation | TR15; Table 11-1 HF9; printed p125; PDF p133

> *"Waterway crossings identified as having elevated flood hazard, scour or erosion risk will be reviewed during detailed design to determine whether additional drainage, scour protection, maintenance provisions or operational controls are required having regard to the proposed design and intended level of service."*

E531 Suitability of public-road access and flood constraints

Details left for later design, delivery or operation | TR15; Table 11-1 HF10; printed p126; PDF p134

> *"Where operational access is dependent on public roads located within flood-prone areas, the suitability of the access route will be reviewed during detailed design. Any identified flood-related access constraints will be considered in operational planning and emergency management procedures."*

Technical Report 16 | **Groundwater**

E532 Full assessment of Camp 3 and Camp 1 Alternate

Information promised for a Submissions or Amendment Report | TR16; Section 1.2 Workforce accommodation camps; printed p12; PDF p13

> *"Full assessment of the proposed locations for Camp 3 and Camp 1 Alternate will be undertaken as part of the Submissions Report/Amendment Report."*

E532 note: Expressly linked to a Submissions Report or Amendment Report; do not count as an explicit post-determination deferral.

E533 Production-bore site selection, site data and groundwater model

Unresolved details with no stated completion stage | TR16; Table 2.2 Groundwater Assessment Toolbox; printed p17; PDF p18

> *"A groundwater model would be required when predicting impacts to groundwater users and sensitive environments if groundwater take from production/pumping bores is required for construction use. At this stage in the project groundwater modelling is premature as any future groundwater take sites have not been selected and site specific data has not yet been collected to set up a model."*

E534 Drawdown assessment if groundwater is taken for construction

Unresolved details with no stated completion stage | TR16; Table 2.2 Groundwater Dependent Ecosystems Policy; printed p17; PDF p18

> *"A drawdown assessment would be required to confirm whether groundwater take for construction use would impact GDEs."*

E535 Reliable groundwater availability and subsequent water dealings

Unresolved details with no stated completion stage | TR16; Section 6.2 Construction groundwater take water supply impacts; printed p54; PDF p55

> *"Actual individual use of allocations presented in Table 6-2 and Appendix C – Tables: Appendix Table 5 were not quantifiable, as such the reliability of groundwater availability cannot be confirmed at this stage. Subsequent water dealings would need to take place to secure groundwater at those sites."*

E536 Pumping tests and baseline monitoring before extraction; minimum 12 months recommended

Details left for later design, delivery or operation | TR16; Section 6.2 Construction groundwater take water supply impacts; printed p54; PDF p55

> *"Prior to extraction of groundwater for construction use, pumping tests and baseline groundwater monitoring (continuous water level monitoring through the deployment of dataloggers and water quality sampling and analysis at quarterly or biannual sampling events) will be required as per the AIP (a minimum of 12 months is recommended), to be undertaken as a management control, to determine sustainable pumping rates and whether induced drawdown is likely to impact surrounding bore users and sensitive environments."*

E536 note: The timing is prior to extraction, not expressly prior to determination; the passage says 12 months is recommended.

E537 Geotechnical/vibration advice, limits and separation distances

Details left for later design, delivery or operation | TR16; Section 6.4.3 Timor and Barry caves; printed p60; PDF p61

> *"To address potential impacts from vibratory construction equipment, EnergyCo will seek geotechnical and vibration advice to inform the construction vibration limits to be applied to works on Sargeants Gap Road to avoid vibration impacts to Timor Caves. Construction works will be designed to not exceed these vibration limits. Additionally, should the use of vibratory compaction equipment be required either along Sargeants Gap Road or in the area north-west of the Barry Caves north extent, the location*

of the works and proximity to the caves (including cave entrances and mapped extents) will be confirmed to determine the separation distance from the construction works."

E538 Additional cave protection pending geotechnical work and detailed design

Details left for later design, delivery or operation | TR16; Table 6-6 access track and road infrastructure; printed p63; PDF p64

"Noting additional protection measures may be required pending further geotechnical work and detailed design."

E539 GWMP field tests, baseline levels, sustainable yields and radius of influence

Details left for later design, delivery or operation | TR16; Table 6-6 groundwater extraction; printed p66; PDF p67

"Impacts of groundwater take for the project are to be managed under a groundwater management plan, which will carry out necessary field tests and establish baseline levels to determine sustainable pumping yield rates, pumping radius of influence and routine groundwater level monitoring at take sites and other sites identified as being potentially impacted from active pumping."

E540 Pumping tests, 12-month baseline and extra observation bores

Details left for later design, delivery or operation | TR16; Section 9.1 Construction; printed p74; PDF p75

"Pumping tests and baseline groundwater monitoring (minimum of 12 months, to account for seasonal variations) (monitoring water level via the installation of a datalogger and water quality at quarterly or biannual sampling events) at groundwater take sites to determine sustainable pumping yields and potential distance drawdown impacts to surrounding bore users and GDEs, which would form part of the GWMP. It is noted that at least one additional monitoring bore would be required per extraction bore to function as observation bores for pumping tests as per the standard methodology and for longer-term impact surveillance."

E541 12-month baseline at Central Hub A to determine impacts on high-value GDEs

Details left for later design, delivery or operation | TR16; Section 9.1 Construction; printed p74; PDF p75

"Baseline groundwater monitoring (minimum of 12 months) (water level via the installation of a datalogger and water quality at quarterly or biannual sampling events) at Central A Hub (north-east of the 500/330 kV transformer yard) to determine potential impacts to riparian terrestrial GDEs (high value HEVAE Blakely's Red Gum GDE)."

E542 Investigations at Sargeants Gap Road and north-west of Barry Caves

Details left for later design, delivery or operation | TR16; Section 9.1 Construction; printed p74; PDF p75

"Geotechnical and/or geophysical investigations will be undertaken along Sargeants Gap Road to assess potential impacts to the Timor Caves karst system from the use of vibration equipment associated with localised road widening works. Geotechnical and/or geophysical investigations will also be undertaken north-west of the known Barry Caves extent, where limestone beds of the Manning Group are suspected to be intersected by access tracks and a minor segment of the transmission alignment. These investigations would form part of the SWMP."

E543 Dewatering volumes, schedule, methods, mitigation, quality testing and disposal options

Details left for later design, delivery or operation | TR16; Table 9-1 GW03; printed p77; PDF p78

"A Dewatering Management Plan (DMP) will be required as an appendix of the SWMP, specifically for ground disturbance works at hubs, where significant cuts are expected which will likely intersect groundwater. A DMP is to consider the following measures: ■ Estimate and present expected dewatering volumes, water production schedule and methods ■ Present feasible dewatering mitigation measures to be implemented during construction for temporary and/or permanently drained cuts ■

Testing of groundwater quality to inform disposal strategy ■ Present groundwater disposal options, which may involve pump and treat, surface discharge, stream discharge, re-injection and/or off-site trucking depending on water quality objectives"

E544 Cave proximity and vibration-tolerance investigations

Details left for later design, delivery or operation | TR16; Table 9-1 GW05; printed p78; PDF p79

"Should the use of vibratory compaction equipment be required either along Sargeants Gap Road for localised road widening works or in the area north-west of the Barry Caves northern extent, where access tracks and a minor segment of the transmission alignment intersect mapped and recognised limestone beds, the location of the works and proximity to cave features (including cave entrances and mapped extents) should be confirmed to understand separation distance from construction activities. Geotechnical and/or geophysical investigations will be required to confirm appropriate vibration thresholds and the tolerance of the karst system to vibration in the vicinity of the works, to prevent potential structural damage."

E544 note: Conditional on vibratory compaction being required; table timing is Construction.

Technical Report 19 | **Contamination**

E545 Further camp contamination assessments are recommended before or during construction

Details left for later design, delivery or operation | TR19; 6.3.1 Soil; printed p57; PDF p58

"It should be noted that intrusive investigation was not undertaken at Camps 1 and 4. Given the limited investigation of workforce accommodation camps, Aurecon recommends that further assessment of these areas be undertaken prior to or during the construction phase. This should include potential AECs, primarily including farm dams and areas subject to historical earthworks."

E545 note: Aurecon considers identified exceedances/data gaps do not prevent the proposed redevelopment; this qualification must accompany any claim.

E546 Disposal spoil requires additional waste classification/leachability assessment

Details left for later design, delivery or operation | TR19; 6.3.2 Indicative waste classification; printed p57; PDF p58

"Any spoil proposed for offsite disposal will need to be further assessed in accordance with NSW EPA 2014 and 2016. This will need to include TCLP analysis of samples that exceed waste category thresholds."

E546 note: Routine final waste classification is common; the passage does not show no indicative classification was performed.

E547 Further assessment is recommended near sensitive water receptors

Details left for later design, delivery or operation | TR19; 6.3.3 Groundwater; printed p58; PDF p59

"Additional targeted assessment is recommended at locations where these sensitive receptors are present within a plausible zone of hydraulic influence. Further assessment should be undertaken in accordance with the NEPM 2013 and ANZG 2018."

E547 note: This responds to data gaps; report distinguishes pre-existing groundwater quality from project-caused contamination.

E548 Locations of livestock dips, disturbed land/fill/dumping and herbicide/pesticide AECs could not be determined or comprehensively mapped

Unresolved details with no stated completion stage | TR19; 6.4 Data gaps and uncertainties; printed p58; PDF p59

> *"The specific location of several AECs such as livestock dips, areas of disturbed land, fill, stockpiling and dumping, and herbicide/pesticide could not be determined based on review of available desktop information. These areas have therefore not been comprehensively mapped on figures presented in Appendix A."*

E548 note: The report recognises these limitations and proposes an unexpected finds protocol.

E549 Moderate/higher areas require further contaminant characterisation

Details left for later design, delivery or operation | TR19; 8.3.1 Soil contamination; printed p71; PDF p72

> *"Areas of moderate or higher impact would require further characterisation works to confirm the nature and extent of COPCs that may pose risks and associated impacts to the project."*

E549 note: The report describes a generally low project-area risk and a conservative assessment.

E550 Unexpected contamination risk is assigned to a later protocol instead of being assessed now

Details left for later design, delivery or operation | TR19; 8.3.1 Soil contamination; printed p71; PDF p72

> *"The potential risk associated with unexpected contamination finds have not been assessed as this would be managed in accordance with an UFP during construction to be detailed in the CEMP."*

E550 note: Unexpected finds cannot all be known in advance; this should not be represented as proof of known contamination harm.

E551 Round 3 intrusive investigations were not completed when the report was prepared

Unresolved details with no stated completion stage | TR19; 8.2 Potential to encounter contamination; printed p71; PDF p72

> *"It is also noted that additional intrusive investigations (Round 3) have not been completed at the time of reporting."*

E551 note: This sentence gives no completion date and should not be presented as proof the investigation must occur after approval.

E552 The contractor must evaluate dewatering quality/quantity, discharge end-use and receiving impacts

Details left for later design, delivery or operation | TR19; 8.3.2 Groundwater contamination; printed p72; PDF p73

> *"If disposal or discharge of dewatering water is required, the contractor must consider the groundwater quality and quantity relative to the nominated discharge end-use, and the potential impacts to the receiving environment."*

E552 note: Conditional on dewatering disposal/discharge being required.

E553 Detailed water-body characterisation is assigned to construction

Details left for later design, delivery or operation | TR19; 8.3.3 Surface water contamination; printed p72; PDF p73

> *"with detailed characterisation more appropriately undertaken at the construction phase where a specific water body is to be affected."*

E553 note: The report expects direct impacts mainly to farm dams at hubs/camps, and contains a high-level characterisation.

E554 Further salinity assessment is deferred to construction

Details left for later design, delivery or operation | TR19; 9.2.4 Salinity; printed p82; PDF p83

> *"potential impacts from salinity are expected to be subject to further assessment during construction works."*

E554 note: The report expects mitigation to manage the risks.

E555 Targeted contamination investigations are to occur before relevant construction where AEC disturbance cannot be avoided

Details left for later design, delivery or operation | TR19; 11.3 Table 11-1 Soils AECs; printed p90; PDF p91

> *"Where disturbance works are unable to be avoided, AECs require further assessment prior to construction via a targeted detailed site investigation (DSI)."*

E555 note: Investigations must follow specified contamination guidelines.

E556 A groundwater management plan is required as an appendix to the soil/water plan

Details left for later design, delivery or operation | TR19; 11.3 Table 11-1 Groundwater contamination; printed p91; PDF p92

> *"A Groundwater Management Plan (GWMP) will be required as an appendix to the SWMP, specifically to monitor impacts of works extracting groundwater for construction purposes at specific locations."*

E556 note: Applies where pumping near AECs may intersect contaminated groundwater; the table lists required contents.

E557 Groundwater sampling, disposal-pathway assessment and any required POEO approval remain later tasks

Details left for later design, delivery or operation | TR19; 11.3 Table 11-1 Groundwater contamination; printed p91; PDF p92

> *"Prior to disposal or discharge of extracted groundwater, further sampling and analysis of groundwater is required with comparison of against criteria relevant to the proposed disposal pathway. This would include ANZG 2018 freshwater quality guidelines for discharge to surface water, trade waste or sewer acceptance criteria for sewer discharge (in accordance with the operators' requirements), and/or requirements of the receiving treatment facility to treat the identified contaminants to meet their licencing conditions. The project may need to gain approval under the POEO Act 1997 prior to discharge or disposal."*

E557 note: The possible POEO approval is conditional, not necessarily required in every case.

E558 Intrusive ASS/ASR investigations and, if necessary, a management plan are left to design/construction

Details left for later design, delivery or operation | TR19; 11.3 Table 11-1 Acid sulfate soils and rocks; printed p92; PDF p93

> *"Disturbance works within the project area intersecting areas of mapped high risk of potential ASS or ASR occurrence would require intrusive investigation and collection of soil samples to determine the presence of actual and/or potential ASS or ASR. If these are encountered, preparation of an acid sulfate soil management plan would be required detailing management controls, monitoring and testing requirements in accordance with the Acid Sulfate Soil Manual (ASSMAC, 1998)."*

E558 note: Conditional on mapped high-risk areas being disturbed.

E559 Naturally occurring asbestos assessment is postponed to targeted sampling before construction where avoidance fails

Details left for later design, delivery or operation | TR19; 11.3 Table 11-1 Naturally occurring asbestos; printed p92; PDF p93

> *"Where disturbance works are unable to avoid relevant areas comprising NOA, further assessment is required prior to construction via a targeted sampling program."*

E559 note: Avoidance is the first option; investigations require specialist expertise.

E560 Additional investigation during detailed design is recommended where works approach AECs

Details left for later design, delivery or operation | TR19; 12 Conclusion; printed p94; PDF p95

> *"However, given data gaps exist for this investigation, further investigation during the detailed design phase should be undertaken if works are proposed within or in proximity to the identified AECs."*

E560 note: The report otherwise concludes risks can be managed; quote is conditional on works in/proximate to AECs.
E560 additional reference: Related location in the same report: Executive summary p8 (PDF9).

E561 Further investigations are particularly required at Nemingha and medium/higher AECs

Details left for later design, delivery or operation | TR19; 12 Conclusion; printed p94; PDF p95

> *"Such further investigations should particularly be undertaken at the Nemingha Maintenance Facility and where future ground disturbance will encounter AECs across the project area with a potential impact of medium or greater."*

E561 note: Read with conclusion that environmental controls and targeted work can manage risk.
E561 additional reference: Related location in the same report: Executive summary p8 (PDF9).

Technical Report 20 | **Anthrax**

E562 Landholder anthrax exposure verification

Unresolved details with no stated completion stage | TR20; Executive Summary conclusions and 7.5 Conclusions; printed p8 and 34; PDF p8, 34

Paraphrase: Further field assessment must test assumptions about landholder exposure once project areas are final.
E562 additional reference: Related location: Human health assessment; printed p25; PDF p25.

E563 Anthrax management planning

Details left for later design, delivery or operation | TR20; Livestock and human-health mitigation; printed p18 and 25; PDF p18, 25

Paraphrase: Specified controls will be incorporated into future anthrax and individual property plans.

E564 Property grazing measures

Details left for later design, delivery or operation | TR20; Table 2 AT5; printed p22; PDF p22

Paraphrase: Grazing changes and associated arrangements depend on later landholder discussions and property plans.

Technical Report 21 | **Equine health**

E565 Equine facilities verification

Details left for later design, delivery or operation | TR21; Executive Summary and Table 8.1 EH1; printed piv and 45; PDF p8, 53

Paraphrase: Equine facility and paddock locations must be verified before construction.

E566 New camp assessment

Information promised for a Submissions or Amendment Report | TR21; 1.2.2.8 Workforce accommodation; printed p5; PDF p13

Paraphrase: Camp 3 and Camp 1 Alternate assessments await amendment.

E567 Temporary horse arrangements

Details left for later design, delivery or operation | TR21; Table 8.1 EH3; printed p45; PDF p53

Paraphrase: Consultation must settle work timing and temporary horse management at Kitchwin Hills.

E568 Sensitive equine scheduling

Details left for later design, delivery or operation | TR21; Table 8.1 EH5; printed p46; PDF p54

Paraphrase: Consultation will identify scheduling adjustments for substantial noise around sensitive equine activities.

Technical Report 22 | **Equine CIC**

E569 Kitchwin Hills and The Barn plans

Details left for later design, delivery or operation | TR22; Executive Summary and Table 8.1; printed pv and 58; PDF p11, 69

Paraphrase: Individual plans must settle schedules, access and temporary alterations before construction.
E569 note: The summary expressly refers to the selected construction contractor engaging with The Barn.

E570 New camp assessment

Information promised for a Submissions or Amendment Report | TR22; 1.2 Project Description; printed p3; PDF p14

Paraphrase: Camp 3 and Camp 1 Alternate assessments await amendment.

EIS **Executive summary**

E571 Final infrastructure siting and disturbance footprint are reserved to detailed design

Details left for later design, delivery or operation | ES; What is the project?; printed p8; PDF p5

> *"Final siting of project infrastructure and the disturbance footprint within the project area would be confirmed during detailed design, subject to environmental management measures and the avoidance of defined no-impact areas."*

E571 note: The sentence states environmental/no-impact constraints and does not independently say that all detailed design occurs after determination.

E572 The overview map expressly marks Camp 3 and Camp 1 Alternate as locations not yet fully assessed

Unresolved details with no stated completion stage | ES; Figure ES 1 Project overview: starred camp-location note; printed p9; PDF p5

> *"* location recently identified but not yet subject to full assessment"*

E572 note: The note applies to starred Camp 3 and Camp 1 Alternate. It gives no completion timing; the main EIS expressly assigns their full assessment to the Submissions/Amendment Report. One map-note occurrence, not two separate word occurrences.

E573 Changes and refinements resulting from submissions are to be addressed in later amendment material

Information promised for a Submissions or Amendment Report | ES; Figure ES 2 Overview of corridor selection and refinement process: EIS project area; printed p13; PDF p7

> *"EIS exhibition which provides an assessment of the EIS project area with a 250 metre-wide preferred corridor. Submissions received on the EIS will be considered in a Submissions Report, with any resulting changes and refinements addressed in an Amendment Report (where required)."*

E573 note: This is explicitly the pre-determination submissions/amendment process; it should not inflate an after-approval count.

E574 Further investigations may feed submissions/amendment assessment and, where required, post-approval refinement

Work expressly allowed after approval | ES; Assessment of environmental, social and economic impacts; printed p19; PDF p10

> *"EnergyCo has committed to undertake further field investigation and assessment as additional land access becomes available within the project area. These investigations may inform an updated assessment for the Submissions Report and the Amendment Report (if required) and, where required, further refined through post-approval processes."*

E574 note: The preceding sentences identify biodiversity, Aboriginal cultural heritage and historical heritage investigations. This expressly permits post-approval refinement but also provides for work before determination; it does not state that every investigation waits for approval.

E575 Some ecological surveys remain incomplete and further survey is contemplated

Unresolved details with no stated completion stage | ES; Biodiversity; printed p20; PDF p11

> *"Where ecological surveys of the project area have not been able to be completed due to land access not being available, a precautionary approach to the identification and assessment of biodiversity values on that land has been applied in accordance with the BAM, including remote survey methodologies, species expert advice and assumed presence. This precautionary approach likely overestimates the extent of biodiversity impacts of the project, and additional survey is likely to result in overall predicted biodiversity impacts reducing."*

E575 note: The summary explicitly describes conservative assessment substitutes already applied. This supports an information gap, not an assertion that unsurveyed land received no assessment.

E576 Biodiversity-related design refinement continues through submissions and detailed design

Details left for later design, delivery or operation | ES; Biodiversity; printed p21; PDF p11

> *"Design refinement will continue through the EIS Submissions Report and detailed design phases, aiming for further avoidance and minimisation of impacts."*

E576 note: The wording spans both submissions and later design; it is not an exclusively post-approval commitment.

E577 The intended strategic offset delivery agreement remains to be sought

Unresolved details with no stated completion stage | ES; Biodiversity; printed p21; PDF p11

> *"Residual impacts will be offset in accordance with the NSW Biodiversity Offset Scheme (BOS), with EnergyCo to seek to enter into a Strategic Offset Delivery Agreement (SODA) with NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW)."*

E577 note: The sentence commits to the statutory offset scheme and a proposed delivery mechanism, but gives no agreement finalisation date.

E578 Whether two high-significance potential archaeological deposits are partly affected depends on the final footprint

Unresolved details with no stated completion stage | ES; Aboriginal heritage; printed p23; PDF p12

> *"However, 2 PADs of high archaeological significance may be subject to partial impact by the project depending on the final layout of the project disturbance footprint."*

E578 note: This is a specific unresolved footprint-dependent outcome. It gives no finalisation stage in the sentence; identified no-impact areas and other assessment findings must remain part of its context.

E579 Site-specific vibration limits are to be identified during detailed design

Details left for later design, delivery or operation | ES; Aboriginal heritage; printed p23; PDF p12

> *"All vibration sensitive Aboriginal sites would be managed to ensure impact avoidance with site-specific vibration limits to be identified during detailed design that avoid impact."*

E579 note: The stated performance objective is impact avoidance; the limits themselves are deferred.

E580 The management plan is to be developed through later consultation

Details assigned to a post approval plan or process | ES; Aboriginal heritage; printed p23; PDF p12

> *"Management of the Aboriginal cultural heritage values would be implemented through an ACHMP to be developed in consultation with RAPs and Heritage NSW."*

E580 note: Post approval timing link: TR02 §12.2.2, printed p310/PDF332 (E310), expressly says the ACHMP will be finalised following project approval. Registered Aboriginal Parties and Heritage NSW consultation is expressly required. A diagram on printed p22 also describes the ACHMP as to be developed through that consultation.
E580 additional reference: Related location: Aboriginal heritage: ACHMP diagram; printed p22; PDF p12.

E581 Protocols for further investigation and management are assigned to the heritage plan

Details assigned to a post approval plan or process | ES; Historical heritage; printed p25; PDF p13

> *"For those heritage values that cannot be fully avoided, the implementation of a Historical Heritage Management Plan will guide mitigation and management measures and establish protocols for further investigation, unexpected finds, and ongoing consultation with Heritage NSW."*

E581 note: Post approval timing link: TR03 §12.3.1, printed p479/PDF520 (E339), expressly says the HHMP will be finalised following project approval. The summary already identifies avoidance measures and assessment results. This concerns later plan detail, not an assertion that all heritage assessment remains undone.

E582 The suite includes later development of the landholder, wellbeing and workforce strategies and code of conduct

Details left for later design, delivery or operation | ES; Social; printed p27; PDF p14

> *"A suite of mitigation and enhancement measures have been developed to address impacts and support improved social outcomes, including the development and implementation of the following: • update of the existing Community and Stakeholder Engagement Plan for construction and operations and inclusion of a Landholder Engagement Strategy within this plan • a Social Impact Management Plan which will include a Community Wellbeing Strategy • a Workforce Management Plan which will include a Workforce Code of Conduct • a Local Industry Participation Plan."*

E582 note: The commitment framework has already been developed and an engagement plan already exists. This passage concerns the specified updates and plan components, not a claim that no social mitigation has been proposed.

E583 Visual mitigation for easement-affected landholders continues through detailed design

Details left for later design, delivery or operation | ES; Landscape and visual; printed p28; PDF p15

> *"EnergyCo will continue to work with easement affected landholders to minimise visual impacts through the detailed design process."*

E583 note: The preceding text distinguishes the treatment of easement-affected properties in the visual assessment and compensation arrangements. Do not treat continuing consultation alone as proof of unassessed impacts everywhere.

E584 Reference-design refinements around the highly affected Rouchel Brook receivers are ongoing

Unresolved details with no stated completion stage | ES; Landscape and visual: Rouchel Brook; printed p29; PDF p15

> *"Continued refinement of the reference design is being undertaken to seek to further reduce visual impacts in this area where practicable, however design constraints related to topography, watercourse and road crossings and biosecurity considerations are limiting."*

E584 note: The source records earlier alignment investigations and completed corridor refinements. This is an unfinished further-refinement process with express constraints, not a promise that impacts will necessarily be eliminated.

E585 Further tower placement/height/spacing refinement and screening choices depend on later design and discussions

Details left for later design, delivery or operation | ES; Landscape and visual; printed p29; PDF p15

> *"EnergyCo will continue to refine the project design to minimise visual impacts on the most affected receivers where practicable, including consideration of tower placement, height and spacing, and the use of intervening topography and vegetation. Where visual impacts remain for the non-easement affected private receivers assessed as having a moderate or high visual impact and the one public viewpoint assessed as having a moderate visual impact, mitigation measures will be implemented. Mitigation measures, including visual screening options, will be discussed with affected landholders and implemented where feasible and reasonable."*

E585 note: The passage limits changes and mitigation by practicability, feasibility and reasonableness; it does not promise every receiver a specified final treatment.

E586 Suitable easement agreements remain to be pursued with landholders

Unresolved details with no stated completion stage | ES; Land use and property; printed p30; PDF p16

> *"Wherever possible, EnergyCo will try to reach a suitable agreement with landholders to establish the required easement, with easement acquisition undertaken in accordance with the NSW Land Acquisition (Just Terms Compensation) Act 1991."*

E586 note: This describes unresolved individual agreements subject to a statutory acquisition framework. It gives no completion stage and does not imply that private agreements must all be published.

E587 Detailed biosecurity controls are assigned to the future project plan

Details left for later design, delivery or operation | ES; Agriculture; printed p32; PDF p17

> *"Biosecurity controls would be detailed in a Biosecurity Management Plan for the project and implemented during construction to minimise the risk of the spread of disease, pests or weeds."*

E587 note: The summary also describes existing risk assessments and proposed safeguards; this sentence specifically reserves the control detail to the plan.

E588 Noise impacts are to be reviewed against the finalised design

Details left for later design, delivery or operation | ES; Noise and vibration; printed p34; PDF p18

> *"Operational noise impacts would be reviewed as the design is finalised and these impacts addressed where practicable."*

E588 note: Predictions have already been made. This is a later design review with a practicability qualification, not the first noise assessment.

E589 Specific remedies for confirmed operational noise exceedances are to be identified with affected residents during operations

Details left for later design, delivery or operation | ES; Noise and vibration; printed p34; PDF p18

> *"During operations, where monitoring shows exceedances at residences, consultation would be undertaken with landholders of affected residences to identify reasonable and feasible mitigation measures."*

E589 note: This is a contingent later operational-stage remedy if monitoring finds exceedances. It does not say that all noise mitigation is deferred, or that no operational noise assessment has been undertaken.

E590 Detailed construction controls await the Noise and Vibration Management Plan during detailed design

Details left for later design, delivery or operation | ES; Noise and vibration; printed p34; PDF p18

> *"The project would implement reasonable and feasible mitigation measures to reduce noise and vibration impacts, with detailed construction controls to be developed in a Noise and Vibration Management Plan during detailed design."*

E590 note: The EIS already proposes mitigation; this sentence expressly distinguishes those proposals from later detailed controls.

E591 Further assessment and selection of tower micro-siting or equipment upgrades are deferred to detailed design

Details left for later design, delivery or operation | ES; Telecommunications; printed p37; PDF p19

> *"One NSW Telco Authority point to point microwave communication link was identified as having a high risk of impact due to its proximity to a proposed transmission tower. Further assessment would be conducted during detailed design in coordination with the NSW Telco Authority and it is expected that this impact can be readily mitigated by micro-siting of the tower and/or upgrading existing telecommunications equipment."*

E591 note: The report predicts the impact can be readily mitigated; the final assessment and response remain to be resolved with the Telco Authority.

E592 Suitable receiving facilities, haulage routes and waste destinations are still being identified

Unresolved details with no stated completion stage | ES; Waste; printed p41; PDF p21

> *"EnergyCo is currently consulting with local government, and other stakeholders including waste management providers to identify suitable waste management facilities, haulage routes and waste stream destinations for the project."*

E592 note: This is a concrete ongoing selection process, not generic engagement; the sentence gives no completion deadline.

E593 Further design, targeted investigations and detailed CEMP controls are relied on to address risks in areas of environmental concern

Details left for later design, delivery or operation | ES; Contamination; printed p41; PDF p21

> *"Human and ecological risks associated with construction activities in AECs would be avoided where practicable, through detailed design, or minimised via targeted environmental investigations and through the implementation of appropriate construction and environmental controls which would be detailed in the project's Construction Environmental Management Plan (CEMP)."*

E593 note: AECs and preliminary risks have already been identified; this concerns completion of the protective detail, not an absence of all contamination assessment.

8 | Supporting context and existing safeguards

These 102 entries preserve relevant context, consultation commitments, existing safeguards and related material. They are excluded from the 593 substantive entries and should be read when assessing the adequacy of the proposed process.

Main EIS

X001 Glossary definition of the disturbance footprint

Supporting context | EIS; Project terminology; printed pvii; PDF p7

> *"The disturbance footprint has been used to inform the impact assessment in this EIS and will be finalised as part of the detailed design and project implementation process."*

X001 note: Glossary statement repeated in report bodies; not a separate project impact. Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.

X002 Glossary definition of habitat connectivity corridors

Supporting context | EIS; Project terminology; printed pviii; PDF p8

> *"Indicative locations of habitat connectivity corridors have been identified in the EIS based on the reference design and will be further refined as the project progresses to the detailed design stage."*

X002 note: Glossary statement repeated in report bodies; not a separate project impact. Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.

X003 Glossary definition of reference design

Supporting context | EIS; Project terminology; printed pix; PDF p9

> *"The reference design will be further refined as the project progresses to the detailed design stage."*

X003 note: Glossary statement repeated in report bodies; not a separate project impact. Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.

X004 Construction Environmental Management Plan

Supporting context | EIS; 3.3.1 Construction overview; printed p104; PDF p139

> *"Prior to the commencement of main construction work, a Construction Environmental Management Plan (CEMP) would be prepared as an overarching document to guide the implementation of environmental management and mitigation measures for the project during the construction phase. The CEMP is planned to be in addition to the issue specific management plans (as identified and discussed in the relevant technical sections) and would outline the environmental management framework for the construction phase of the project and detail how the management and mitigation measures from this EIS (summarised in Section 25) would be implemented."*

X004 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway. Count treatment: General CEMP preparation commitment; concrete later-plan content is documented separately.

X005 Decommissioning and rehabilitation plan

Supporting context | EIS; 3.5 Decommissioning and rehabilitation; printed p143; PDF p178

> *"Following construction, the life of the project is anticipated to be around 50 years and potentially beyond this with regular maintenance and upgrades. If required, decommissioning and rehabilitation would occur over a period of around 2 years. A detailed decommissioning and rehabilitation plan would be prepared prior to decommissioning of the project."*

X005 note: An end-of-life plan; its timing differs from unresolved construction inputs. Count treatment: End of life planning, separated from unresolved construction or operational design inputs.

X006 Two stage clearing procedure

Supporting context | EIS; 7.7 Mitigation and management; printed p286–287; PDF p321–322

> *"A two-stage clearing procedure will be prepared as part of the Vegetation Clearing Protocol (a sub-plan to the BMP). Where hollow bearing trees or key habitat features are identified, they will be clearly marked on site during pre-clearing surveys by an ecologist and spatially recorded. Prior to the commencement of any clearing, hollow inspections will be undertaken using scope/camera technology by a suitably qualified ecologist to identify active fauna use, assess hollow condition and occupancy, and inform appropriate fauna-sensitive clearing methods which may include avoiding clearing of confirmed breeding habitat during spring/or breeding season. Non-habitat vegetation will be cleared first and habitat tree removal will be delayed for at least 24 hours after clearing of surrounding vegetation. In the absence of surrounding vegetation (for example clearing of an isolated habitat tree), alternate clearing methodology may be prescribed. Habitat trees will be felled using fauna appropriate methods based on hollow size and risk (sectional dismantling preferred for trees with hollows >5 cm), with immediate inspection of felled material, appropriate treatment or relocation of any fauna encountered, and documentation of methods used."*

X006 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X006 additional reference: Appendix F repeat: B11, printed p13, PDF p266.

X007 Conservation investment priorities

Supporting context | EIS; 7.7.1 Additional conservation initiatives; printed p294; PDF p329

> *"Further consultation with relevant stakeholders will be undertaken to seek to confirm investment priorities. Potential conservation initiative options currently being investigated are outlined below with further opportunities to be explored:"*

X007 note: Count treatment: Voluntary conservation investment beyond mandatory offsets, rather than a core missing approval detail.

X008 LP4 Direct and indirect impacts on State forests

Supporting context | EIS; 12.6 Mitigation and management; printed p508; PDF p543

> *"To minimise impacts to State forests and forestry operations (including recreational uses), the FCNSW will be consulted as part of continued design development, and prior to and during construction activities."*

X008 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X008 additional reference: Appendix F repeat: LP4, printed p54, PDF p307.

X009 LP5 Impacts to mine exploration

Supporting context | EIS; 12.6 Mitigation and management; printed p508; PDF p543

> *"To minimise disruption to mining exploration activities, the Department of Primary Industries and Regional Development – NSW Resources, and holders of exploration licenses will continue to be consulted as part of ongoing design development prior to and during construction."*

X009 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X009 additional reference: Appendix F repeat: LP5, printed p54, PDF p307.

X010 LP6 Impacts to transport infrastructure

Supporting context | EIS; 12.6 Mitigation and management; printed p508; PDF p543

> *"To minimise disruption to road and rail corridors and operations during construction activities (stringing) impacting the New England and Oxley Highways, and rail corridors, infrastructure owners will be consulted as part of continued design development and prior to and during construction activities."*

X010 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X010 additional reference: Appendix F repeat: LP6, printed p54, PDF p307.

X011 AG10 GPS impacts

Supporting context | EIS; 13.7 Mitigation and management; printed p545; PDF p580

> *"If impacts on agricultural precision farming GPS signals arise due to operation of the project, the cause of any such interference will be investigated. Any disruption due to operation of the project will be addressed in consultation with the affected landholder and may include measures such as signal boosting equipment or antenna enhancements (where applicable)."*

X011 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X011 additional reference: Appendix F repeat: AG10, printed p59, PDF p312.

X012 EH2 Equine management

Supporting context | EIS; 13.7 Mitigation and management; printed p546; PDF p581

> *"Consultation with affected landholders or property managers will be undertaken during detailed design, construction and operation where activities have the potential to affect equine management, access or property operations."*

X012 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X012 additional reference: Appendix F repeat: EH2, printed p60, PDF p313.

X013 TT6 Heavy vehicles

Supporting context | EIS; 14.6 Mitigation and management; printed p572; PDF p607

> *"A vehicle access permit will be sought for all B-doubles and OSOM vehicle movements where required. The heavy and OSOM movements will be in accordance with the permit requirements and be outside of peak traffic periods where possible."*

X013 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X013 additional reference: Appendix F repeat: TT6, printed p66, PDF p319.

X014 TT8 Heavy vehicles

Supporting context | EIS; 14.6 Mitigation and management; printed p572; PDF p607

> *"A NHVR exemption permit will be obtained for any parts of the final OSOM route which requires access through roads which are restricted or conditionally approved for OSOM vehicles."*

X014 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X014 additional reference: Appendix F repeat: TT8, printed p67, PDF p320.

X015 SW1 Impacts to soil and water resources from construction

Supporting context | EIS; 18.6 Mitigation and management; printed p703; PDF p738

> *"A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) will be developed and implemented in accordance with relevant guidelines."*

X015 note: Count treatment: General management planning or an existing safeguard, without a distinct unresolved parameter in this passage. Specific designs, quantities and agreements are recorded elsewhere.
X015 additional reference: Appendix F repeat: SW1, printed p88, PDF p341.

X016 SW2 Impacts to watercourses and waterfront land from additional watercourse crossings

Supporting context | EIS; 18.6 Mitigation and management; printed p703; PDF p738

> *"Minimise impacts from watercourse crossings by limiting crossings to existing access tracks where practicable, locating and orienting crossings to reduce disturbance, and designing crossings to minimise flood risk and impacts on upstream and downstream watercourse conditions. Design watercourse crossings to consider existing bed and bank stability, hydraulic gradients, and required scour protection, and: • consider geomorphic design risk rankings, where watercourses are rated as high geomorphic design risk, as requiring enhanced designs for geomorphic protection • consider geomorphic protection rankings, where watercourses are listed as high or very high, as requiring additional consideration of watercourse protection during detailed design and construction • maintain streamflow in watercourses during construction works and where permanent watercourse crossings are proposed. Design, construct and maintain crossings to be generally in accordance with DPI Fisheries Policy and Guidelines for Fish Habitat Conservation and Management (DPI, 2013), and Why Do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings (Fairfull & Witheridge, 2003), including riparian buffer zones being established adjacent to areas of Key Fish Habitat."*

X016 note: Count treatment: General management planning or an existing safeguard, without a distinct unresolved parameter in this passage. Specific designs, quantities and agreements are recorded elsewhere.

X016 additional reference: Appendix F repeat: SW2, printed p88–89, PDF p341–342.

X017 SW3 Impacts to watercourses and waterfront land from vegetation clearing

Supporting context | EIS; 18.6 Mitigation and management; printed p703; PDF p738

> *"Optimise, where possible, the number and location of transmission towers to minimise vegetation clearing within waterfront lands."*

X017 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.

X017 additional reference: Appendix F repeat: SW3, printed p89, PDF p342.

X018 SW4 Impacts to natural drainage and flow regimes

Supporting context | EIS; 18.6 Mitigation and management; printed p704; PDF p739

> *"Minimise impacts to natural drainage and flow regimes by locating infrastructure and stockpiles away from drainage lines, riparian vegetation and overland flow paths, grading earthworks to maintain existing catchments and flow paths where practicable, and diverting upstream flows around construction areas as required."*

X018 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X018 additional reference: Appendix F repeat: SW4, printed p89, PDF p342.

X019 GH2 GHG emissions

Supporting context | EIS; 21.4 Mitigation and management; printed p735; PDF p770

> *"The purchase of electrical vehicles and equipment will be investigated to reduce or eliminate on-site fuel use."*

X019 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X019 additional reference: Appendix F repeat: GH2, printed p100, PDF p353.

X020 GH10 GHG emissions

Supporting context | EIS; 21.4 Mitigation and management; printed p736; PDF p771

> *"Consideration will be given to using on- site renewable energy sources where possible to supplement electricity purchased from the grid at construction support sites and workforce accommodation camps."*

X020 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X020 additional reference: Appendix F repeat: GH10, printed p101, PDF p354.

X021 SC7 Soil and surface water contamination - chemical spills and runoffs

Supporting context | EIS; 22.5 Management and mitigation; printed p758; PDF p793

> *"All chemicals, fuels or other hazardous substances will be stored in accordance with the supplier's instructions and relevant legislation, Australian Standards and applicable guidelines. A spill response plan will be developed and implemented. Environmental spill kits containing spill response materials suitable for the work being undertaken will be available with extras available to be carried in vehicles. All staff will be trained in emergency spill procedures. Herbicide application will comply with label requirements and applicable buffer distances from surface water."*

X021 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X021 additional reference: Appendix F repeat: SC7, printed p105, PDF p358.

X022 WM1 Waste management

Supporting context | EIS; 23.5 Mitigation and management; printed p773; PDF p808

> *"A Waste Management Plan (WMP) will be prepared and will include appropriate measures to manage waste generation, reuse, recycling and disposal during construction of the project."*

X022 note: Count treatment: General management planning or an existing safeguard, without a distinct unresolved parameter in this passage. Specific designs, quantities and agreements are recorded elsewhere.
X022 additional reference: Appendix F repeat: WM1, printed p106, PDF p359.
X022 additional reference: Same EIS passage in Section 23 - Waste (PDF).pdf, PDF p14.

X023 WM3 Waste management

Supporting context | EIS; 23.5 Mitigation and management; printed p773; PDF p808

> *"In the Nundle, Terrible Billy and Hanging Rock State Forest areas, the reuse of any usable timber for forestry purposes will be discussed with the FCNSW."*

X023 note: Count treatment: General management planning or an existing safeguard, without a distinct unresolved parameter in this passage. Specific designs, quantities and agreements are recorded elsewhere.
X023 additional reference: Appendix F repeat: WM3, printed p106–107, PDF p359–360.
X023 additional reference: Same EIS passage in Section 23 - Waste (PDF).pdf, PDF p14.

X024 CI2 Cumulative impacts

Supporting context | EIS; 24.2.4 Management and mitigation; printed p816; PDF p851

> *"Cumulative impacts will be considered in construction planning and sequencing of the project with the objective of minimising potential cumulative impacts where practicable."*

X024 note: Count treatment: Routine consultation, implementation, optional mitigation or a specified safeguard; retained outside the substantive count.
X024 additional reference: Appendix F repeat: CI2, printed p108, PDF p361.

X025 Network Operator engagement plan

Supporting context | EIS; 25.1 Approach to environmental management; printed p819; PDF p854

> *"Stakeholder engagement would be ongoing throughout the project's detailed design, construction and operational stages, including with the community and other key stakeholders including government authorities. The existing community and stakeholder engagement plan (CSEP) would be updated by the network operator to detail the approach to engagement between the network operator, the community, community groups, government authorities and other identified stakeholders during detailed design, construction, and operation of the project."*

X025 note: Count treatment: Update of the existing engagement plan; useful process context rather than a separate unfinished engineering or impact assessment detail.

X026 Operational Environmental Management Plan

Supporting context | EIS; 25.3 Operational environmental management; printed p821; PDF p856

> *"• an OEMP to be prepared and implemented by the network operator."*

X026 note: Section 25 also requires relevant issue-specific plans to be approved by the Planning Secretary before main construction; enabling works have a separate plan pathway. Count treatment: General OEMP preparation commitment; the separate internal-document and supporting-plans passage is retained as substantive.

EIS **Appendices A to F**

X027 Safety provisions in post approval management plans

Supporting context | APP; Appendix D Table D.3 Electricity Supply Act 1995; printed pD-6; PDF p122

> *"Safety has been considered through the design development for the project and would be critical throughout the construction and operation of the project. Safety considerations would be incorporated into post-approval management plans including the construction environmental management plan."*

X027 note: Express post approval wording, but general safety management planning rather than a particular unresolved engineering parameter.

X028 Biodiversity methodology following approval

Supporting context | APP; Appendix E Agency consultation outcomes CPHR row; printed pE-102; PDF p245

> *"Post approval methodology to be agreed with CPHR following EIS process, including for incidental and unexpected finds."*

X028 note: This is in the Issues raised column of EnergyCo's agency consultation summary. It is not an independently issued CPHR requirement or a stand alone promise by EnergyCo.

X029 No material design detail is expressly deferred in this sentence; bunded oil containment is specified for later design/construction

Supporting context | APP; Appendix F §1.1, Table F.1; printed p1; PDF p254

> *"Transformer areas will include bunded oil containment isolated from stormwater systems."*

X029 note: Routine implementation commitment; do not include in a substantive deferral count merely because timing is detailed design/construction.

X030 No material capacity parameter is deferred: minimum capacity is specified

Supporting context | APP; Appendix F §1.1, Table F.1; printed p1; PDF p254

> *"Oil containment systems will have a minimum capacity of 130% of largest oil volume or 54 kilolitres."*

X030 note: Routine implementation commitment; do not include in a substantive deferral count merely because timing is detailed design/construction.

X031 Consultation with the rail authority and probable use of future maintenance/shutdown windows

Supporting context | APP; Appendix F §1.1, Table F.1; printed p2; PDF p255

> *"Stringing work across rail lines will be undertaken in consultation with the relevant rail authority and are likely to occur during planned maintenance windows or scheduled shutdown periods to avoid disruption to rail services."*

X031 note: Weak/qualified deferral: wording says likely and concerns construction scheduling. No express post-determination milestone; distinguish from an unassessed infrastructure design.

X032 Detailed Decommissioning and Rehabilitation Plan to be prepared prior to project decommissioning

Supporting context | APP; Appendix F §1.1, Table F.1; printed p3; PDF p256

> *"A detailed Decommissioning and Rehabilitation Plan will be prepared prior to project decommissioning."*

X032 note: This is an explicit later lifecycle milestone, not the literal phrase after determination; substantive end-of-life plan deferral. Count treatment: End of life decommissioning planning, separated from unresolved construction inputs.

X033 No engineering detail is expressly deferred; notifications will identify activities, timing, impacts and measures in advance of materially affecting activities

Supporting context | APP; Appendix F §1.1, Table F.1; printed p4; PDF p257

> *"Construction notifications will be provided to affected landholders, nearby receivers, councils, agencies and other relevant stakeholders in advance of activities that may materially affect access, amenity, traffic, property operations or local services. Notifications will identify the nature and timing of the activity, expected impacts, management measures and contact pathways."*

X033 note: Context/countervailing commitment only. Do not count a promised advance notification as proof that the corresponding information was omitted from the EIS.

X034 Network operator update of the CSEP to detail engagement during detailed design, construction and operation, including communication, participation, complaints and monitoring mechanisms

Supporting context | APP; Appendix F §1.1, Table F.1; printed p4–5; PDF p257–258

> *"Stakeholder engagement will be ongoing throughout the project's detailed design, construction and operational stages, including with the community and other key stakeholders including government authorities. The existing community and stakeholder engagement plan (CSEP) will be updated by the network operator to detail the approach to engagement between the network operator, the community, community groups, government authorities and other identified stakeholders during detailed design, construction, and operation of the project. The community and stakeholder engagement plan will: • identify people, organisations, councils, and government agencies and other stakeholders to be consulted • outline how information about project activities, progress, impacts and key milestones will be communicated • describe the approach to community and stakeholder engagement, including distribution of accessible information and opportunities to participate and provide feedback • identify communication and engagement risks, issues and management measures • set out procedures for managing enquiries, feedback and complaints, including how people can contact the project team • outline processes for working with councils, government agencies and other stakeholders • establish mechanisms for monitoring, reporting and continuous improvement of communication and engagement activities."*

X034 note: Existing CSEP already exists; this is an update and ongoing-engagement commitment. Do not suggest there will be no subsequent consultation. No express post-determination milestone. Count treatment: Revision of an existing engagement plan; the undertaking also provides future participation and complaints channels.

Technical Report 1 | **Biodiversity**

X035 Micro-siting outcomes will be incorporated into the BMP/GIS/site plans before works

Supporting context | TR01; 8.5.4 Table 8.73 B5 continued; printed p751; PDF p817

> *"Micro-siting outcomes will be incorporated into the BMP, project GIS layers and site-specific plans prior to works."*

X035 note: These refinements aim to reduce impacts, not necessarily increase them. Count treatment: Requirement to document micrositing outcomes in plans/GIS before works; the excerpt does not separately state which siting detail remains unresolved. Stronger micrositing and corridor records exist.

X036 The independent clearing/disturbance tracking procedure is still to be prepared

Supporting context | TR01; 8.5.4 Table 8.73 B7; printed p753; PDF p819

> *"A Clearing and Disturbance Tracking procedure will be prepared (independent of the BMP) that will include:"*

X036 note: The table prescribes contents; setup is preconstruction and tracking continuous. Count treatment: Opening commitment to prepare a tracking procedure; the excerpt does not itself identify an unresolved technical threshold or method, while the table already prescribes tracking requirements.

X037 The two-stage clearing procedure remains to be prepared

Supporting context | TR01; 8.5.4 Table 8.73 B11; printed p757; PDF p823

> *"A two-stage clearing procedure will be prepared as part of the Vegetation Clearing Protocol (a sub-plan to the BMP)."*

X037 note: Some precise requirements already appear, including hollow inspections and a 24-hour delay in the following text. Count treatment: Future formalisation of a two-stage clearing procedure; the surrounding table supplies substantial method requirements, so the isolated future-document sentence is weak evidence of withheld detail.

X038 Investment priorities for additional conservation initiatives are not confirmed

Supporting context | TR01; 8.5.6 Proposed Conservation Initiatives; printed p772; PDF p838

> *"Further consultation with relevant stakeholders will be undertaken to seek to confirm investment priorities. Potential conservation initiatives currently being investigated are outlined below, with further opportunities to be explored:"*

X038 note: These are voluntary opportunities beyond offsets-scheme compliance, not substitutes stated for mandatory mitigation. Count treatment: Voluntary additional conservation-investment opportunities beyond mandatory offset compliance; preserve context but separate from the count of unresolved core design, assessment and mitigation details.

Technical Report 4 | **Social impacts**

X039 Cultural impacts are to be managed through a future ACHMP

Supporting context | TR04; 5.2.6 Management Approach; printed p134; PDF p154

> *"Management measures relevant to impacts to connection to Country and cultural values will be largely managed through the Aboriginal Cultural Heritage Management Planning (ACHMP) processes, following the recommendations made in the Aboriginal Cultural Heritage Assessment Report (Umwelt, 2026) and Cultural Values Assessment (2026). The ACHMP will be developed in consultation with Heritage NSW and RAPs."*

X039 note: Consultation with Heritage NSW and Registered Aboriginal Parties is promised. Count treatment: General referral of cultural-value management to ACHMP processes, without specifying an unresolved detail in this excerpt; stronger ACHMP methods and threshold records exist.

X040 The existing engagement plan will be revised for later project stages

Supporting context | TR04; 7.1 Table 7.1 SO2; printed p198; PDF p218

> *"The existing project Community and Stakeholder Engagement Plan (CSEP) would be revised and updated to guide ongoing, proactive and responsive engagement with landholders, communities, councils, service providers and Aboriginal and Torres Strait Islanders groups throughout the pre-construction and construction period."*

X040 note: This is revision of an existing plan, not evidence that there has been no engagement plan. Count treatment: Revision of an existing engagement plan is promised, but this excerpt does not itself identify an unresolved substantive requirement; retain as background to the specific new Landholder Engagement Strategy.

X041 A Workforce Code of Conduct is to be included in the plan

Supporting context | TR04; 7.1 Table 7.1 SO4 continued; printed p201; PDF p221

> *"include a Workforce Code of Conduct to clearly define expected standards of behaviour for all project personnel, including contractors and subcontractors, including:"*

X041 note: The table does identify intended standards and continues on p202 with breach procedures and induction. Count treatment: Code of Conduct inclusion commitment only; adjacent source text already sets behavioural standards. This short excerpt supplies no distinct unresolved specification.

Technical Report 6 | **Agriculture**

X042 Interference investigations and tailored remedies are triggered if impacts arise during operation

Supporting context | TR06; 9 Table 9-1 AG10; printed p81; PDF p82

> *"If impacts on agricultural precision farming GPS signals arise due to operation of the project, the cause of any such interference will be investigated. Any disruption due to operation of the project will be addressed in consultation with the affected landholder, and may include measures such as signal boosting equipment or antenna enhancements (where applicable)."*

X042 note: This is conditional adaptive mitigation, not evidence that interference will necessarily occur. Count treatment: Conditional response to any future precision-farming GPS interference, not an identified incomplete assessment or a currently unresolved site-specific design.

Technical Report 7 | **Traffic and transport**

X043 Road safety audits of permanent upgrades at later design stages

Supporting context | TR07; Section 4.3.3 Table 4-2 Road safety audits; printed p29; PDF p45

> *"Consistent with standard Austroads and TfNSW practice, road safety audits would be undertaken during later design stages where permanent road upgrades are proposed and detailed design information is available."*

X043 note: Count treatment: Standard later road-safety audit process. No specific outstanding road treatment or route decision is identified here; retain the substantive road-design evidence separately.

X044 Local-road access permits/notices and council conditions

Supporting context | TR07; Section 5.4.2 Existing heavy vehicle routes; printed p58; PDF p74

> *"Where access to local roads is not already approved, it would be determined in accordance with the requirements of the HVNL, including any necessary access permits or notices. Consultation would be undertaken with the relevant council in its role as road authority to inform access arrangements and identify any required conditions or mitigation measures, including consideration of road geometry, pavement capacity, roadside constraints and local operational factors."*

X044 note: Count treatment: Generic process for obtaining local-road heavy-vehicle access permits and consulting road authorities. Does not identify which route or treatment is being left unresolved; specific choices appear at E396, E397, E398, E399, E401, E402.

X045 TTMP to detail potential traffic/access impacts and consultation

Supporting context | TR07; Section 9.1.1 Traffic Management Measures; printed p165; PDF p181

> *"A Traffic and Transport Management Plan (TTMP) would be prepared as part of the Construction Environmental Management Plan and would establish the overarching framework for managing traffic and transport impacts during construction."*

X045 note: Count treatment: Generic TTMP umbrella sentence. E388 expressly says the detailed TTMP is not prepared and why; E401, E402 identify its deferred contents. Do not add an independent issue for this introduction.

X046 Permits for B-doubles and OSOM movements where required

Supporting context | TR07; Table 9-1 vehicle access permits; printed p169; PDF p185

> *"A vehicle access permit would be sought for all B-doubles and OSOM vehicle movements where required. The heavy and OSOM movements would be in accordance with the permit requirements and be outside of peak traffic periods where possible."*

X046 note: Count treatment: Routine commitment to seek required heavy/OSOM vehicle permits, with transport-period safeguards.

X047 Pre-construction road dilapidation reports

Supporting context | TR07; Table 9-1 road condition; printed p169; PDF p185

> *"Dilapidation reports would be prepared for relevant local roads affected by OSOM movements or construction traffic, where required by the relevant road authority, to document pre-construction conditions and inform any reinstatement requirements due to damage caused by the project's OSOM movements."*

X047 note: Preparation is qualified by the requirements of the relevant road authority. Count treatment: Dilapidation reports document pre-construction road condition and possible reinstatement. This is routine condition evidence, not by itself an omitted project design or impact assessment.

X048 Exemption permits for restricted/conditionally approved final-route roads

Supporting context | TR07; Table 9-1 NHVR exemptions; printed p169; PDF p185

> *"A NHVR exemption permit would be obtained for any parts of the final OSOM route which requires access through roads which are restricted or conditionally approved for OSOM vehicles."*

X048 note: Only applies where parts of the final route need an exemption. Count treatment: Routine commitment to obtain an NHVR exemption for restricted/conditional roads. Final-route selection is counted separately.

X049 Utility-provider design approval for communication infrastructure adjustments

Supporting context | TR07; Drawing NEREZRUA-AURC-NWW-GN-SKE-600003 note 11; unnumbered appendix drawing; PDF p338

> *"ALL ADJUSTMENT WORKS ON ANY COMMUNICATION INFRASTRUCTURE , INCLUDING DESIGN APPROVAL MUST BE UNDERTAKEN BY CONCERNED UTILITY PROVIDER (OR CONTRACTED RESOURCES)."*

X049 note: Count treatment: Drawing note assigns communications-adjustment/design approval to the utility provider or its contractors. Does not itself say that an identified adjustment is undesigned or when approval will occur.

Technical Report 10 | **Preliminary risk screening**

X050 Conditional emergency plan

Supporting context | TR10; Table 5-1 HR1; printed p27; PDF p35

Paraphrase: An emergency plan will be developed if workplace safety rules require it.

Technical Report 11 | **Aviation**

X051 Firefighting final design consultation

Supporting context | TR11; 5.1.2 Table 2 NSW RFS; printed p34; PDF p36

Paraphrase: RFS consultation continues through design and provision of the final design.

X052 Aviation design assumptions

Supporting context | TR11; 5.1.2 Table 2 specialist operators; printed p35; PDF p37

Paraphrase: Further engagement will validate tower heights, conductor clearance and visibility assumptions.

X053 Forestry interface design

Supporting context | TR11; 5.1.2 Table 2 Forestry Corporation; printed p36; PDF p38

Paraphrase: Forestry consultation and final-design information continue through detailed design.

X054 NPWS flight planning

Supporting context | TR11; 5.1.2 Table 2 NPWS and 6.6; printed p36 and 70; PDF p38, 72

Paraphrase: NPWS will receive the final design for flight planning after further consultation.

X055 Private airstrips

Supporting context | TR11; 5.1.2 Table 2 landholders; printed p37; PDF p39

Paraphrase: Consultation about private aviation operations continues during design.

X056 Final obstacle data

Supporting context | TR11; 8.1 Management; printed p78; PDF p80

Paraphrase: Final tower coordinates and elevations will be supplied to aviation stakeholders.

Technical Report 12 | **Bushfire**

X057 Final infrastructure siting and disturbance footprint retain flexibility within the assessed area

Supporting context | TR12; Glossary: Project area; printed pviii; PDF p11

> *"The project area represents the area within which the construction and operation of the project would occur and provides flexibility for the final siting of project infrastructure and disturbance footprint. Final siting of the infrastructure and disturbance footprint can move within the assessed project area subject to recommended environmental management measures and avoidance of identified 'no impact' areas."*

X057 note: The quoted definition states movement constraints but does not itself state timing. It is a repeated project-wide definition, not an independent bushfire-specific decision. Count treatment: Generic project-area definition, also repeated across other documents. Useful context; no independent deadline or new bushfire decision.

X058 Validation of tower heights, conductor clearances and visibility assumptions remains an ongoing consultation task

Supporting context | TR12; 3.4 Table 3.1: Specialist aviation subcontractors (row continued from p9); printed p10; PDF p21

> *"Ongoing engagement to validate design assumptions, including tower heights, conductor clearance and visibility considerations (e.g. line marking)"*

X058 note: This describes ongoing engagement, without specifying completion timing; the same table records prior consultation and corridor refinements. It does not prove that no aviation assessment has occurred. Count treatment: Ongoing validation of assumptions; no completion point stated. Corroborates aviation assessment rather than adding a separate post-approval decision.

X059 Further alignment refinement and integration of forestry requirements are assigned to ongoing engagement and detailed design

Supporting context | TR12; 3.4 Table 3.1: Forestry Corporation of NSW; printed p10; PDF p21

> *"Ongoing engagement proposed to support refinement of the alignment and integration of forestry requirements into detailed design and project delivery"*

X059 note: Earlier input on access, harvesting cycles and timber management is recorded; this is a continuing design process, not evidence that the entire issue was omitted.

X060 Incorporation of NPWS operational and land-management considerations remains an ongoing consultation task

Supporting context | TR12; 3.4 Table 3.1: National Parks and Wildlife Service; printed p10; PDF p21

> *"Ongoing consultation to incorporate NPWS operational and land management considerations into project design"*

X060 note: The table records prior NPWS input and observations. The sentence gives no completion date and cannot establish a post-approval timing on its own. Count treatment: Ongoing consultation without a concrete final design outcome or deadline. Context rather than counted deferral.

X061 Cyclic vegetation inspection and control are to follow standards determined by the Network Operator

Supporting context | TR12; 8 Table 8.1 BF10; printed p68; PDF p79

> *"Cyclic inspection and control of vegetation within transmission line easements in accordance with Network Operator standards. The standards determined by the Network Operator must meet the requirements of Electricity Supply (Safety and Network Management) Regulation 2014."*

X061 note: This is an operational implementation commitment subject to regulation, not an admission that vegetation management will be unrestricted. Count treatment: Operator vegetation standards are described, but the passage does not say those standards do not yet exist or that they await approval.

X062 A regulatory operator safety-management system and documented fire-safety assessment are identified as required implementation documents

Supporting context | TR12; 8.1.4 Transmission network maintenance and operation; printed p69; PDF p80

> *"Under NSW regulations (Electricity Supply (Safety and Network Management) Regulation 2014 – Regulation 7), 500 kV network operators are required to prepare an Electricity Network Safety Management System (ENSMS) conformant with Australian Standard AS 5577:2013 Electricity Network Safety Management Systems."*

X062 note: This is a description of a standing regulatory obligation, not a project-specific admission that assessment is incomplete. The following paragraph states regulator submission, review and periodic audit. Retain only as lower-weight context. Count treatment: Standing regulatory obligation to prepare a safety system. It does not establish that this project currently lacks a required system.

X063 Future operating safeguards depend partly on lifecycle asset-management plans and associated inspection programs

Supporting context | TR12; 8.1.5 Asset Management Planning; printed p70; PDF p81

> *"Accordingly, such assets are maintained to high reliability standards, in accordance with lifecycle Asset Management Plans. These plans are prepared consistent with ISO 55001:2014 Asset Management – Management Systems – Requirements, assuring high quality of asset management planning."*

X063 note: This passage describes routine asset-management practice and does not expressly state when a project plan will be completed. Do not use it as strong proof of deferred impact assessment. Count treatment: General asset-management practice. It does not identify an unresolved project-specific detail or finalisation date.

X063 additional reference: Related location: Table 8.1 BF2; printed p64; PDF p75.

Technical Report 14 | **Surface water**

X064 Final disturbance footprint

Supporting context | TR14; Table 1.2 key project terms; printed p6; PDF p13

> *"The disturbance footprint has been used to inform the impact assessment in this EIS and will be finalised as part of the detailed design and project implementation process."*

X064 note: Count treatment: General disturbance-footprint definition; already represented by main EIS X001/E041. Retain as a grouped repeated location, not an additional substantive issue.

X065 Reference design refinement

Supporting context | TR14; Table 1.2 key project terms; printed p6; PDF p13

> *"The reference design will be further refined as the project progresses to the detailed design stage."*

X065 note: Count treatment: General reference-design definition; already represented by main EIS X003/E004. Retain as a grouped repeated location, not an additional substantive issue.

X066 Additional watercourse consideration during detailed design and construction

Supporting context | TR14; Section 2.3.2.1.5 Geomorphic risk ranking; printed p20; PDF p27

> *"The rankings have been used to help identify those watercourses that, during the detailed design and construction stages of the project, should have additional consideration where works are within waterfront lands or runoff is concentrated into the watercourses."*

X066 note: Count treatment: Risk rankings will prompt additional consideration; no particular outstanding crossing design or assessment is identified in this sentence.

X067 Site-specific slope gradient feeding erosion hazard design

Supporting context | TR14; Section 3.5.1.1; printed p73; PDF p80

> *"The slope gradient will be particular to the specific site and the associated detailed designs."*

X067 note: Count treatment: Merely says slope depends on the particular site/design. It does not expressly commit an assessment or decision to a later phase.

X068 Site-specific ESCPs and SWMPs before construction

Supporting context | TR14; Section 4.1; printed p80; PDF p87

> *"Erosion and sediment control plans (ESCPs), as well as soil and water management plans (SWMP) will be developed prior to construction works commencing and will form part of the Environmental Management Plan (EMP) for the project."*

X068 note: Count treatment: Bare commitment to prepare ESCP/SWMP/EMP before construction. Keep as management-framework context, with concrete outstanding designs and quantities counted elsewhere.

X069 Watercourse risk review during detailed design

Supporting context | TR14; Section 5.3; printed p93; PDF p100

> *"The rankings have been used to help identify those watercourses that where this should be considered during the risk review stage of detailed design."*

X069 note: Count treatment: Repeats generic risk-ranking consideration. No additional defined outstanding design decision is specified.

X070 Avoidance of works within 40 metres of third-order watercourses

Supporting context | TR14; Table 5.9 Camp 2 Waverly Road Glenrock; printed p97; PDF p104

> *"Clearing, filling or other forms of landscape modification within 40 m of the high bank of the adjacent 3rd order watercourses should be avoided in detailed design."*

X070 note: An avoidance recommendation, rather than a fixed final camp layout. Count treatment: States a 40 m avoidance safeguard for detailed design. It does not identify an unresolved component or deferred assessment.

X071 Acid sulfate soil management plan if soils are encountered

Supporting context | TR14; Section 5.5.1; printed p99; PDF p106

> *"If these are encountered, preparation of an acid sulfate soil management plan would be required detailing management controls, monitoring and testing requirements in accordance with the Acid Sulfate Soil Manual (ASSMAC, 1998) and EnergyCo's Health, Safety and Environment Guideline."*

X071 note: Conditional management provision; does not prove that acid sulfate soils are present. Count treatment: Conditional acid-sulfate-soil response plan if encountered; specified management framework, rather than affirmative deferral of a known project component. Keep relevant on-site investigation at E502.

X072 Area-specific erosion and sediment control plans

Supporting context | TR14; Section 5.5.4; printed p102; PDF p109

> *"Project construction and decommissioning would require area specific erosion and sediment control plans (ESCP) to be developed generally in accordance with 'Blue Book' and considering the erosion hazard of each location (Section 3.5.1.1), with the aim to:"*

X072 note: Count treatment: Repeats preparation of area-specific ESCPs under the Blue Book. Does not itself provide a separate deferred decision beyond the generic SWMP/ESCP commitment.

X073 Ability to source water from other locations

Supporting context | TR14; Section 5.6 Water supply; printed p103; PDF p110

> *"EnergyCo is continuing investigations into the ability to source water from other locations."*

X073 note: Count treatment: Broad ongoing investigation of other water locations; grouped with the regional water context at X100, X102 and excluded from the substantive count.

X074 SWMP and ESCP preparation; timing column says Pre-construction

Supporting context | TR14; Table 7.1 SW1; printed p107; PDF p114

> *"A Soil and Water Management Plan (SWMP) and Erosion and Sediment Control Plan (ESCP) will be developed and implemented in accordance with relevant guidelines"*

X074 note: Count treatment: Generic SWMP/ESCP preparation and implementation commitment. Same subject as X068; contextual framework.

X075 Watercourse crossing design and additional protection for high risk watercourses

Supporting context | TR14; Table 7.1 SW2; printed p107; PDF p114

> *"Design watercourse crossings to consider existing bed and bank stability, hydraulic gradients, and required scour protection, and: • consider geomorphic design risk rankings, where watercourses are rated as high geomorphic design risk, as requiring enhanced designs for geomorphic protection. • consider geomorphic protection rankings, where watercourses are listed as high or very high, as requiring additional consideration of watercourse protection during detailed design and construction. • maintain streamflow in watercourses during construction works and where permanent watercourse crossings are proposed."*

X075 note: Count treatment: Prescribes crossing design criteria and additional regard to risk rankings; no specific unassessed crossing or unset parameter is identified. Concrete crossing-design deferrals are at E484, E487 and site rows.

X076 Number and location of towers within waterfront land; timing column says Detailed design

Supporting context | TR14; Table 7.1 SW3; printed p107; PDF p114

> *"Optimise, where possible, the number and location of transmission towers to minimise vegetation clearing within waterfront lands."*

X076 note: Count treatment: Optimisation to minimise vegetation clearing is an existing safeguard, not a statement that a particular decision or assessment is missing.

X077 Infrastructure and stockpile placement, earthworks and diversion design

Supporting context | TR14; Table 7.1 SW4; printed p108; PDF p115

> *"Minimise impacts to natural drainage and flow regimes by locating infrastructure and stockpiles away from drainage lines, riparian vegetation and overland flow paths, grading earthworks to maintain existing catchments and flow paths where practicable, and diverting upstream flows around construction areas as required."*

X077 note: Count treatment: Lists drainage safeguards already committed to; does not expressly defer an unspecified drainage plan or assessment.

X078 Project-specific acid sulfate soil management plan

Supporting context | TR14; Table 7.1 SW5; printed p108; PDF p115

> *"If encountered, a project specific acid sulfate soil management plan (ASSMP) will be required, specifically pertaining to ground disturbance activities occurring in the vicinity of Lake Glenbawn."*

X078 note: Conditional mitigation; table timing is Construction. Count treatment: Conditional acid-sulfate-soil management plan if encountered, repeating X071. Keep on-site investigation evidence separately.

X079 Plans forming part of future environmental management plans

Supporting context | TR14; Section 7.2; printed p108; PDF p115

> *"ESCPs and SWMPs will be prepared as a component of any future EMPs to outline measures to manage and monitoring surface water impacts associated with the construction and decommissioning works."*

X079 note: Count treatment: Repeats generic future ESCP/SWMP preparation without specifying new outstanding designs, quantities or impact findings.

X080 Inspection and receiving-water quality monitoring programs

Supporting context | TR14; Section 7.2; printed p108; PDF p115

> *"Inspection and monitoring programs will be developed and implemented, including requirements for receiving water quality monitoring."*

X080 note: Count treatment: Generic inspection and receiving-water monitoring program; monitoring alone is not proof of withheld project details.

X081 Emergency Response Plan

Supporting context | TR14; Section 7.2; printed p108; PDF p115

> *"An Emergency Response Plan (ERP) will also be developed."*

X081 note: Count treatment: Bare Emergency Response Plan commitment. Use E505, E527, E528 where emergency routes, protocols or isolation assessments are specified.

Technical Report 15 | **Flooding**

X082 Siting, flood mitigation and resilience strategies in next design stages

Supporting context | TR15; Section 5.7.3; printed p29; PDF p37

> *"The results of the impact assessment inform the recommended flood mitigation and management measures for the next design stages. These recommendations include considerations for the siting of infrastructure, suitable flood mitigation measures and site-specific flood resilience strategies to be incorporated during detailed design."*

X082 note: Count treatment: General statement that assessment recommendations will inform the next design stages. Specific omissions and outstanding hydraulic details are established by E507–E514.

X083 Project-specific flood emergency procedures with Council and SES

Supporting context | TR15; Section 8.5; printed p101; PDF p109

> *"Project-specific emergency procedures will be developed in consultation with local councils and the SES for site safety during flood events without affecting broader community flood management operations."*

X083 note: Count treatment: Generic consultation to prepare site-safety flood emergency procedures. Count the concrete future emergency-access/isolation evaluations in E527, E528 instead.

X084 Confirmation/review of minor-impact conclusions at detailed design

Supporting context | TR15; Section 11; printed p124; PDF p132

> *"Only minor impacts are expected which can be confirmed and reviewed at detailed design stage."*

X084 note: Count treatment: General expectation of minor impacts to be confirmed/reviewed later. The excerpt does not identify a distinct unresolved component; detailed flood assessment is stated concretely in E525.

Technical Report 16 | **Groundwater**

X085 Whether an Environment Protection Licence is needed

Supporting context | TR16; Table 2.2 POEO Act; printed p18; PDF p19

> *"The need for an EPL will be confirmed during detailed design."*

X085 note: Count treatment: Confirmation of whether an EPL is needed is a licensing process; it is not itself an unresolved project component or impact assessment.

X086 Operational plan and permanent drainage/water-management design

Supporting context | TR16; Section 9.2 Operation; printed p75; PDF p76

> *"Operation Environmental Management Plan (OEMP) including: – Emergency spill controls and procedures – Measures for the handling, containment and usage of fuels and chemicals ■ Design of permanent drainage and water management, protective of groundwater quality at points of infiltration"*

X086 note: Count treatment: Lists routine operational spill/chemical/drainage controls. The quoted text does not identify a particular deferred design, absent assessment or unconfirmed parameter.

X087 SWMP for the construction phase

Supporting context | TR16; Table 9-1 GW01; printed p76; PDF p77

> *"A SWMP is to be developed for the construction phase of the project, which shall include:"*

X087 note: Count treatment: Introductory SWMP sentence ending in a colon. Count the substantive items separately, not this umbrella plan introduction.

X088 Unexpected Contamination Finds Plan appended to SWMP

Supporting context | TR16; Table 9-1 GW01; printed p76; PDF p77

> *"An UCFP is to be developed and appended to the SWMP, which shall include measures to manage discovered/encountered contaminated groundwater during construction, which may be noted as visual/olfactory indicators (odour/colour)."*

X088 note: Count treatment: Unexpected-contaminated-groundwater protocol is a standard contingency for discoveries during construction, not by itself evidence of a known assessment omission.

X089 Project-specific acid sulfate soil plan

Supporting context | TR16; Table 9-1 GW02; printed p76; PDF p77

> *"If encountered, a project specific acid sulfate soil management plan (ASSMP) will be required, specifically pertaining to ground disturbance activities occurring in the vicinity of Lake Glenbawn."*

X089 note: Count treatment: Repeats conditional Lake Glenbawn acid-sulfate-soil management plan. Group with X071, X078 as contextual safeguards.

X090 Groundwater Management Plan for construction extraction

Supporting context | TR16; Table 9-1 GW04; printed p77; PDF p78

> *"A GWMP will be required as an appendix to the SWMP, specifically to monitor impacts of works extracting groundwater for construction purposes at specific locations. A GWMP is to consider the following measures:"*

X090 note: Count treatment: Quoted excerpt only introduces a monitoring management plan and ends in a colon; it omits the substantive pumping-yield and impact-investigation measures. Count E536, E539, E540, E541, or the full GW4 measure, instead.

X091 Project-wide operational plan

Supporting context | TR16; Table 9-1 GW06; printed p78; PDF p79

> *"Development of a project-wide OEMP, specific measures include:"*

X091 note: Count treatment: Only the heading/introduction to a project-wide OEMP is quoted; it contains no defined outstanding project detail.

X092 Contractors' assessment of subsurface conditions, additional tests, techniques and equipment

Supporting context | TR16; Section 11 Limitations; printed p80; PDF p81

> *"Subsurface conditions relevant to future construction work should be assessed by contractors who can make their own interpretation of the factual data provided and perform any additional tests as necessary for their own purposes and determine the suitability of particular techniques and equipment for the conditions."*

X092 note: This is a consultant limitation and contractor responsibility statement; it does not itself establish an approval date. Count treatment: Standard consultant limitation assigning contractors responsibility for subsurface interpretation/tests and construction techniques. Useful contractor-responsibility context; alone it does not prove an EIS design or resource assessment was withheld.

Technical Report 17 | **Air quality**

X093 Dust management plan

Supporting context | TR17; 6 Management Measures Table 27; printed p49; PDF p57

Paraphrase: A future construction plan will document receiver distances, impacts, controls and review cycles.
X093 note: Specific dust controls are already listed; this is a plan-preparation commitment.

Technical Report 18 | **Greenhouse gas**

X094 Electric vehicles and equipment

Supporting context | TR18; Table 5 GH2; printed p11; PDF p17

Paraphrase: Electric plant procurement remains for investigation before construction and during delivery.

X095 Local materials

Supporting context | TR18; Table 5 GH9; printed p12; PDF p18

Paraphrase: Local material sourcing remains subject to feasibility during procurement.

X096 Camp energy systems

Supporting context | TR18; Table 5 GH10; printed p12; PDF p18

Paraphrase: On-site renewable supply for camps and support sites remains for consideration.

Technical Report 19 | **Contamination**

X097 Contractors are expected to interpret conditions, do additional testing as necessary and select techniques/equipment

Supporting context | TR19; 13 Limitations; printed p95; PDF p96

> *"Subsurface conditions relevant to future construction work should be assessed by contractors who can make their own interpretation of the factual data provided and perform any additional tests as necessary for their own purposes and determine the suitability of particular techniques and equipment for the conditions."*

X097 note: This is a consultant limitation/recommendation, not itself a legally binding contractor commitment. Count treatment: Generic consultant limitations language directing contractors to interpret data and test for their own purposes; not itself a substantive project commitment to postpone a specified assessment.

Technical Report 20 | **Anthrax**

X098 Mitigation governance

Supporting context | TR20; 7.4 Advantages and limitations of risk assessment; printed p34; PDF p34

Paraphrase: The report recommends establishing processes and governance to oversee mitigation delivery.

Technical Report 21 | **Equine health**

X099 Property measures

Supporting context | TR21; 8 Mitigation and Management; printed p44; PDF p52

Paraphrase: Construction and property plans will implement equine protections.

Regional water context

X100 Supply shortfalls, feasible options, funding/delivery planning and 2027 initiatives

Supporting context | REG; Outcomes; printed p3; PDF p3

> *"While this recent work has helped us better understand potential water demand, further work is needed to understand potential supply shortfalls. We are working with DCCEEW Water and council to understand regional water supply estimates under a range of conditions. Together with our refined demand modelling, these two pieces of work will give us a clearer picture of the potential gap between water demand and supply. This will allow us to assess which options best address the region's temporary water demands during REZ delivery, informing feasibility studies, funding pathways and delivery planning in close collaboration with the DCCEEW Water, local councils and industry. While further work is still required, strong progress has already been made through our collaborative efforts with councils, agencies and other stakeholders. We expect to share more detailed information on proposed water initiatives in 2027."*

X100 note: Regional water-demand update, not the project EIS; future 2027 timing does not itself identify determination timing. Count treatment: Substantive regional water-supply uncertainty and proposed 2027 information, but from a regional demand update covering wider REZ delivery. Keep prominent regional context, outside the EIS-project deferral headline.

X101 Implications for water supply systems, sources and wastewater demand

Supporting context | REG; Next steps; printed p16; PDF p16

> *"Further work is underway to better understand the implications of these demands on water sources, supply systems and overall water availability. Further work is also required to understand the potential demands on wastewater systems."*

X101 note: Separate regional update; no explicit approval milestone. Count treatment: Regional water/wastewater work remains outstanding; broader programme context, not a specific promise to defer this network-project detail until determination.

X102 2026 and 2027 technical investigations and feasibility studies; funding and delivery pathways

Supporting context | REG; Next steps; printed p16; PDF p16

> *"As part of this work, EnergyCo is undertaking technical investigations and feasibility studies over 2026 and 2027 to identify, assess, prioritise and scope initiatives that respond to forecast water and wastewater infrastructure capacity challenges and help to mitigate cumulative water impacts. These investigations will include potential funding and delivery pathways of identified initiatives, and opportunities to drive legacy benefits across the New England region."*

X102 note: Separate regional update, rather than a project EIS approval commitment. Count treatment: 2026–2027 regional infrastructure feasibility/scoping work is material context. It does not establish the timing of the network-project determination and should not be counted as an EIS post-determination deferral.

9 | Assessment requirements and agency questions

The issued Amended SEARs are dated 7 April 2026. The excerpts below are reproduced from the Appendix A compliance table and were cross checked against the issued requirements. Both locations are provided. The questions identify matters requiring a public response; a later design reference alone does not establish a breach of an assessment requirement.

Project description and layout

“a full description of the project, accompanied by suitable maps and plans” and “physical layout of the project over time, including sections of key components”

Issued SEARs p1; Appendix A printed A-2/PDF4

Which final choices can materially change a landholder’s exposure, and where is their assessed limit shown? Identify the site, dimensions, range and impact envelope for each deferred component. [E005, E008, E011, E036, E037]

Consistency across assessments

“consistency in information presented in the EIS and all technical reports, including distances, development footprint, project design and infrastructure proposed, construction timeframes and receiver numbers”

Issued SEARs p2; Appendix A printed A-2/PDF4

Provide one reconciled set of design inputs, camp locations, footprints, haulage assumptions and receiver data before determination. Explain every material difference between reports. [E022, E023, E173, E458]

Mitigation and uncertainty

“actions proposed to deal with any uncertainties associated with the assessment”

Issued SEARs p2; Appendix A printed A-4/PDF6

For every remaining uncertainty, disclose its consequence, responsible decision maker, completion date, applicable limit and public review pathway. Explain why a condition or later plan is sufficient. [E244, E245, E247, E248]

Water supply and wastewater

“details of water requirements, supply arrangements and wastewater disposal arrangements for construction and operation (including consultation with suppliers)”

Issued SEARs p3; Appendix A printed A-8/PDF10

Where are the source specific available volumes, drought reliability, supply commitments, treatment capacities and disposal arrangements? Explain what remains conditional on future agreements or investigations. [E038, E205, E206, E533, E535, E536]

Groundwater and flooding

“an assessment of the potential flooding impacts and risks of the project”

Issued SEARs p3; Appendix A printed A-9/PDF11

How are neighbouring properties and public access protected where drainage designs, groundwater pumping impacts or road flooding impacts remain for later study? [E508, E521, E209, E211, E212, E218]

Transport routes and upgrades

"a schedule of all required haulage route road upgrades" and "strategic concept designs of proposed road upgrades (including the site access point(s))"

Issued SEARs p4; Appendix A printed A-14/PDF16

Identify what has been assessed at concept level, what remains to be confirmed, and which later route or vehicle choices could change traffic, safety, noise or road works. The requirement is for strategic concept design, not necessarily every construction drawing. [E388, E397, E398, E399, E409, E413]

Visual effects of all components

"a detailed assessment of the visual impacts of all components of the project"

Issued SEARs p4; Appendix A printed A-14/PDF16

Demonstrate that camp and ancillary layouts, lights and final siting choices remain within an assessed visual envelope. Provide the unmodelled or conditional components and their locations before the decision. [E127, E131, E136, E173]

Heritage investigations

"an assessment of the impact to Aboriginal heritage (cultural and archaeological), including test excavations"

Issued SEARs p3; Appendix A printed A-7/PDF9

Which significance and impact findings will be made before determination, and which are proposed to pass into the ACHMP or HHMP? Explain how the decision can be made with those specific findings outstanding. [E100, E122, E319, E320, E321, E341]

Biodiversity and ancillary works

"assess the impacts associated with all ancillary infrastructure, including the transport route road upgrades"

Issued SEARs p3; Appendix A printed A-6/PDF8

Identify any unsurveyed or later selected sites and show the conservative assumptions, maximum disturbance and impact limits applied to them. Confirm final protective corridor and buffer arrangements. [E036, E037, E070, E245, E273]

Public safety and emergency arrangements

"an assessment of the risks to public safety, paying particular attention to bushfire risks, emergency egress and evacuation, the handling and use of any dangerous goods and potential impacts to high pressure gas pipelines"

Issued SEARs p5; Appendix A printed A-16/PDF18

Identify the safe design envelope and unresolved choices for camp evacuation, flooding, chemicals and pipeline interactions. Show when each assessment must be complete and who may review it. [E188, E189, E195, E196, E211, E212]

Waste quantities and disposal

"identify, quantify and classify the likely waste streams to be generated throughout all stages of the project" and "safely dispose of this waste (in consultation with waste facilities, including Councils)"

Issued SEARs p5; Appendix A printed A-17/PDF19

Provide the assessed quantities, classifications, destinations and available licensed capacities, and identify which elements are still conditional on later plans or supply arrangements. [E226, E227, E228, E268]

Workforce and local services

"details of how the construction workforce will be managed to minimise local impacts, including consideration of construction workforce accommodation"

Issued SEARs p5; Appendix A printed A-18/PDF20

What camp and service arrangements can be assessed now, and what remains for the workforce plan? Identify minimum capacities, service agreements, housing protections and monitoring triggers. [E126, E355]

Plans and public engagement

"The EIS must include all relevant plans, architectural drawings, diagrams and relevant documentation required under Part 8 of the EP&A Regulation. Provide these as part of the EIS rather than as separate documents."

Issued SEARs p6; Appendix A printed A-18/PDF20

Explain which information is relevant to the approval decision and why any such detail can be deferred. Identify the public process for material later designs and assessments. [E236, E237, E239, E240]

Water agency advice needs its own response

DCCEEW Water and WaterNSW advice is relevant agency evidence. It should not be silently treated as wording identical to the issued SEARs. The following requests can be put directly to EnergyCo and the assessment department.

Consolidated water balance

"A detailed and consolidated site water balance."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Take and Licensing 1; PDF p2. Attachment A is unnumbered.

Explain how the exhibited water balance remains reliable while water sourcing and increased drought demand await detailed design. Do not treat a future strategy alone as proof that no water balance exists. See E204, E206 and E503.

All water intercepting works

"Description of all works/activities that may intercept, extract, use, divert or receive surface water and/or groundwater. This includes the description of any development, activities or structures that will intercept, interfere with or remove groundwater, both temporary and permanent."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Take and Licensing 2; PDF p2. Attachment A is unnumbered.

Identify which works, take locations and dewatering requirements are already assessed and which remain dependent on later design or site selection. See E217, E484, E533 and E543.

Water sources and supplier volumes

"Details of all water take for the life of the project and post closure where applicable. … If the water is to be taken from an alternative source confirmation should be provided by the supplier that the appropriate volumes can be obtained."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Take and Licensing 3; PDF p2. Attachment A is unnumbered.

Identify supplier confirmations and obtainable volumes alongside the express statements that supply arrangements and groundwater availability remain unconfirmed. The quotation gives two excerpts from the same requirement. See E478, E503 and E535.

Licences and market depth

"Details of Water Access Licences (WALs) held to account for any take of water where required, or demonstration that WALs can be obtained prior to take of water occurring. This should include an assessment of the current market depth where water entitlement is required to be purchased."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Take and Licensing 4; PDF p2. Attachment A is unnumbered.

Identify the evidence demonstrating obtainable entitlements and market depth where later water dealings remain necessary. The request expressly allows demonstration that licences can be obtained; it does not require every licence to be held at exhibition. See E535 and E206.

Wet and dry groundwater baseline

"A description of groundwater conditions that provides an understanding of groundwater level across the site under a range of wet and dry conditions."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Impacts 5; PDF p3. Attachment A is unnumbered.

Explain what baseline already supports the assessment and what remains to be established through the proposed monitoring. See E218, E536, E540 and E541.

Water users rights and ecosystems

"Assessment of impacts on surface and ground water sources (both quality and quantity) including flooding, related infrastructure, adjacent licensed water users, basic landholder rights, watercourses, riparian land, groundwater dependent ecosystems, and ground water levels; including measures proposed to reduce and mitigate these impacts."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Impacts 6; PDF p3. Attachment A is unnumbered.

Explain how effects on water users, ecosystems and adjacent properties can be assessed where take-site modelling, drawdown investigations and detailed flood studies remain outstanding. See E533, E534, E521 and E525.

Monitoring methods

"Proposed surface and groundwater monitoring activities and methodologies."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Impacts 7; PDF p3. Attachment A is unnumbered.

Distinguish the proposed methods already disclosed from future baseline work, locations and triggers. A request for proposed methods does not itself require all monitoring to be completed at exhibition. See E218, E540 and E541.

Waterfront works and setbacks

"A description of the watercourses located within the vicinity of the development, including Strahler Stream Order as mapped by Spatial Services NSW, and appropriate riparian setbacks. Impact assessment of all works/activities located on waterfront land as defined by the Water Management Act 2000, including an assessment against the Guidelines for Controlled Activities."

DCCEEW Water Group, 23 December 2025, Attachment A, Water Impacts 8; PDF p3. Attachment A is unnumbered.

Show how the assessment covers crossings and waterfront works whose design, location or treatment remains for detailed design. This does not assert that all crossings lack assessment. See E484, E485, E487 and E488.

Lake Glenbawn and catchment impacts

"The water and soils assessment is to consider impacts on lake Glenbawn, including their associated catchments."

WaterNSW, 22 January 2026, water and soils bullet; printed and PDF p2. Deleted text omitted.

Deleted text omitted from this quotation: the letter visibly strikes out Chaffey Dam and. Explain how later site investigations and final waterfront, drainage and soil controls near Lake Glenbawn relate to the catchment impacts already assessed. See E502.

10 | Source list and reference guide

The sources are the October 2026 exhibited project documents and supporting material. Dates follow each report rather than its later Portal upload timestamp. Compressed and uncompressed copies of the same report are not counted as separate works. Printed page references control if another PDF edition shifts the viewer pagination.

EIS New England Renewable Energy Zone Network Infrastructure Project Environmental Impact Statement
Energy Corporation of NSW (EnergyCo) | October 2026, Final | 889 PDF pages

Official source

APP Environmental Impact Statement: Appendices A–F
Energy Corporation of NSW (EnergyCo) | October 2026, Final | 385 PDF pages

Official source

TR01 Biodiversity Development Assessment Report
Umwelt (Australia) Pty Limited | October 2026; approved 1 October 2026, Final | 3276 PDF pages

Official source

TR01FIG Biodiversity Development Assessment Report: Figures
Umwelt (Australia) Pty Limited | October 2026, Final | 3709 PDF pages

Official source

TR02 Aboriginal Cultural Heritage Assessment
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd | September 2026, Final | 386 PDF pages

Official source

TR02AF Aboriginal Cultural Heritage Assessment: Appendices A–F
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 49 PDF pages

Official source

TR02G Aboriginal Cultural Heritage Assessment: Appendix G — Predictive Model Mapping (Figure Series)
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 35 PDF pages

Official source

TR02HJ Aboriginal Cultural Heritage Assessment: Appendices H–J
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 136 PDF pages

Official source

TR02K Aboriginal Cultural Heritage Assessment: Appendix K — Survey Results (Figure Sets)
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 114 PDF pages

Official source

TR02LP Aboriginal Cultural Heritage Assessment: Appendices L–P
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 226 PDF pages

Official source

TR02Q Aboriginal Cultural Heritage Assessment: Appendix Q — Databases, Significance Assessment and Management
Umwelt (Australia) Pty Limited and OzArk Environment & Heritage Management Pty Ltd (parent report); Umwelt mapping for G and K | September 2026, Final | 31 PDF pages

Official source

TR03 Historical Heritage Impact Assessment
Umwelt (Australia) Pty Limited | September 2026; approved 3 September 2026, Final | 691 PDF pages

Official source

TR04 Social Impact Assessment
Umwelt (Australia) Pty Limited | September 2026; approved 7 September 2026, Final | 461 PDF pages

Official source

TR05 Landscape Character and Visual Impact Assessment
Moir Landscape Architecture Pty Ltd trading as Moir Studio | 7 September 2026; Revision 07 FINAL | 215 PDF pages

Official source

TR05FK Landscape Character and Visual Impact Assessment Appendices F to K
Moir Landscape Architecture Pty Ltd trading as Moir Studio | 7 September 2026; Revision 07 FINAL | 237 PDF pages

Official source

TR05AE Landscape Character and Visual Impact Assessment: Appendices A–E
Moir Landscape Architecture Pty Ltd trading as Moir Studio | 7 September 2026; parent report Revision 07 FINAL | 195 PDF pages

Official source

TR06 Agricultural Impact Assessment
Tremain Ivey Advisory; author Peter Tremain | Revision 7 September 2026 | 112 PDF pages

Official source

TR07 Traffic and Transport Impact Assessment
Aurecon Australasia Pty Ltd | 28 September 2026; Revision 0, Final | 403 PDF pages

Official source

TR08 New England REZ Network Infrastructure Project Economic Assessment
Gillespie Economics | September 2026 | 67 PDF pages

Official source

TR09 Noise and Vibration Impact Assessment
SLR Consulting Australia | 24 September 2026; v1.0 | 612 PDF pages

Official source

TR10 Technical Report Preliminary Risk Screening
Aurecon Australasia Pty Ltd | 4 September 2026; Final | 48 PDF pages

Official source

TR11 Aviation Impact Assessment
Aviation Projects Pty Ltd | 24 September 2026; Final | 115 PDF pages

Official source

TR12 New England Renewable Energy Zone Network Infrastructure Project: Bushfire Risk Assessment
GHD Pty Ltd | 28 September 2026 cover; Revision 2 approved 29 September 2026 | 119 PDF pages

Official source

TR13 EIS Technical Report Electric and Magnetic Field Study
Aurecon Australasia Pty Ltd | 9 October 2026; Final | 104 PDF pages

Official source

TR14 New England Renewable Energy Zone Network Infrastructure Project: Surface Water Assessment
Engeny Australia Pty Ltd | 24 September 2026; Final | 226 PDF pages

Official source

TR15 New England Renewable Energy Zone Network Infrastructure Project: Hydrology and Flood Impact Assessment
Aurecon Australasia Pty Ltd | 9 September 2026; Final | 858 PDF pages

Official source

TR16 Technical Report: Groundwater Impact Assessment
Aurecon Australasia Pty Ltd | 28 September 2026; Final | 238 PDF pages

Official source

TR17 Air Quality Impact Assessment
Airen Consulting | 3 September 2026; Final Revision 2 | 59 PDF pages

Official source

TR18 Greenhouse Gas Assessment
Airen Consulting | 3 September 2026; Final Revision 1 | 29 PDF pages

Official source

TR19 Technical Report 19: Contamination Assessment
Aurecon Australasia Pty Ltd | 4 September 2026; Final | 2279 PDF pages

Official source

TR20 Anthrax Assessment and Management Strategy for New England REZ Project
Ausvet Pty Ltd and Public Health Matters Pty Ltd | September 2026; Project report summary | 38 PDF pages

Official source

TR21 Equine Health Impact Assessment
N and S Kannegieter Pty Ltd | August 2026; Final | 109 PDF pages

Official source

TR22 Impact assessment of New England REZ on the Upper Hunter Equine CIC
HoustonKemp | September 2026; A report for EnergyCo | 95 PDF pages

Official source

SEARS Planning Secretary's Environmental Assessment Requirements — SSI-74175972
NSW Department of Planning, Housing and Infrastructure | Issued 7 April 2026 | 10 PDF pages

Official source

ADVICE-WNSW-2024 SEARs – New England Renewable Energy Zone Transmission Project – SSD-74175972
WaterNSW | 13 August 2024 | 2 PDF pages

ADVICE-WNSW-2026 New England Renewable Energy Zone Network Infrastructure Project – Transmission line alignment – revised Scoping Report (SSI-74175972)
WaterNSW | 22 January 2026 | 2 PDF pages

Official source

ADVICE-WATER-2025 New England REZ Transmission Project – SSI-74175972: Comment on the Secretary's Environmental Assessment Requirements (SEARs)
NSW Department of Climate Change, Energy, the Environment and Water — Water Group | 23 December 2025 | 4 PDF pages

Official source

REGIONAL-WATER Regional water demand update: New England Renewable Energy Zone (REZ)
NSW Government; EnergyCo and NSW DCCEEW Water Group identified in the document | October 2026 | 17 PDF pages

EXEC Environmental Impact Statement: Executive Summary

Energy Corporation of NSW (EnergyCo) | October 2026, Final | 25 PDF pages

Official source

Official project record
NSW Planning Portal New England REZ Transmission Project

Issued assessment requirements

Planning Secretary Environmental Assessment Requirements, SSI-74175972, issued 7 April 2026, 10 PDF pages. Appendix A of the EIS reproduces the relevant requirements.

Issued Amended SEARs

Abbreviations

Abbreviation	Meaning
ACHA / ACHMP	Aboriginal Cultural Heritage Assessment / Management Plan
HHIA / HHMP	Historical Heritage Impact Assessment / Management Plan
CEMP / OEMP	Construction / Operational Environmental Management Plan
BMP / BDAR	Biodiversity Management Plan / Biodiversity Development Assessment Report
TTIA / TTMP	Traffic and Transport Impact Assessment / Management Plan
OSOM	Oversize and overmass transport
PAD / RAP	Potential archaeological deposit / Registered Aboriginal Party
APZ / GDE	Asset protection zone / Groundwater dependent ecosystem
CPHR / SEARs	Conservation Programs Heritage and Regulation / Secretary Environmental Assessment Requirements
CSEP / SWMP	Community and Stakeholder Engagement Plan / Soil and Water Management Plan

WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha