

30 January 2026

Erin Matarazzo
Environmental Assessment Officer
NSW Department Planning and Environment

Dear Ms Matarazzo,

Thunderbolt Wind Farm Modification 1 (MOD1) (SSD 10807896) - Muswellbrook Shire Council (Staff) comments on the Modification Report

Reference is made to the following:

- *'Thunderbolt Wind Farm MOD1 Modification Report'* (Umwelt, November 2025) (Modification Report); and
- Request to provide comment on the Modification Report via the Major Projects Portal.

Neoen Australia Pty Ltd (Proponent) proposes to develop the approved Thunderbolt Wind Farm SSD-10807896 (the Project) to generate wind energy to supply the people of New South Wales (NSW) with renewable electricity. The Project is located in the Kentucky area of NSW, 47 kilometres (km) northeast of Tamworth adjacent to the New England Highway.

Whilst undertaking detailed design and construction planning for the Project, Neoen identified the requirement to modify the consent to provide for alternate component transportation arrangements and additional minor infrastructure to facilitate construction of the Project.

MOD1 includes the following key components:

- A modified transport route to provide for full length turbine blades to the Project from the Port of Newcastle. The original application assessed a split blade;
- Proposed intersection works within the Muswellbrook Local Government Area (LGA);
- Amendments to the road network at 12 different locations along the transport route (including within the Muswellbrook Shire Council and Tamworth Regional Council LGAs); and
- Revised construction traffic vehicle movement and associated extension of construction phase from an 18-month duration to 40 months.

Muswellbrook Shire Council (Staff) appreciate the opportunity to comment on the Modification Report and its submission is as follows:

Traffic and Road Maintenance

The use of local Council roads for the transport of Over Size Over Mass (OSOM) to the New England Renewable Energy Zone (REZ) and Central West-Orana REZ has been under discussion with different State Government agencies for five years. While some progress has been made on the route 1a option in EnergyCo's Port to REZ strategy, the approach being taken to resolve route 1b is still unclear. While Thunderbolt Wind Farm (SSD 10807896) is south of the New England REZ, it is one of between 10 – 50 renewable energy projects that wish to use route 1b over the next 10 years.

1. Council's current position on the movement of Over Size Over Mass vehicles to access another shire is outlined below:

OSOM Vehicle Movements Policy – Muswellbrook Shire

Local roads within Muswellbrook Shire are not to be used for Over Size Over Mass (OSOM) vehicle movements unless the origin or destination is within the Shire.

Council authorises the General Manager to object to State Significant Development (SSD) applications that propose using local roads for OSOM transport to other LGAs, unless the movement starts or ends within Muswellbrook Shire. This objection remains in place until the NSW Government:

- 1. Establishes a "Port to REZ" route and introduces measures (for example, road user charges and/or maintenance agreements) to protect ratepayers from the impacts of OSOM traffic; or*
- 2. Delays construction of new renewable energy projects or mine developments/mine expansions north of Muswellbrook until the Muswellbrook Bypass is operational.*

Council also authorises Staff to engage with EnergyCo, Transport for NSW, and project proponents to support a strategic solution that ensures:

- appropriate road standards;*
- fair cost-sharing; and*
- demonstrable positive long-term community outcomes.*

Note: *Staff will not issue permits under Section 138 of the Roads Act for roads works that support OSOM movements other than those with an origin or destination within Muswellbrook Shire until a strategic solution is agreed.*

In addition to this, the structural integrity of the bridge structures in Bell Street and Bengalla Link Road are an ongoing concern to Council and we may, at any time, need to impose weight limits on these bridge structures if they deteriorate rapidly or are damaged. This would impact many other road users within and external to the Shire.

It is not a fair or reasonable position to expect the ratepayers of the Shire to be responsible for funding emergency repairs, or long-term maintenance activities when there is no mechanism to secure funds from the proponents moving OSOM on local roads.

2. On 21 May 2025, Staff met with the Proponent to discuss how Council's concerns could be addressed in the absence of a broader, State-led strategic solution. Following this meeting, Staff provided the Proponent with a list of matters that would need to be addressed in the Modification Report. The Proponent has generally provided a response to these issues in the Modification Report. However, since issuance of the advice in May 2025, Staff have been approached by several other renewable energy proponents seeking to use Council-owned roads to access the New England REZ and surrounding areas. In the absence of an overarching Infrastructure Maintenance Agreement, supported by a Development Contributions Plan that applies consistently across all projects, Council is unable to adequately protect ratepayers from the cumulative impacts of OSOM vehicle movements.

There is also an issue with many projects having approvals with no conditions of consent that require them to make payments to Muswellbrook Shire Council under a Contributions Plan. For all these reasons Council is unlikely to support Option 1b (Wybong Road east,

Kayuga Road, Stair Street) if not classified as a State Road or unless the State Government agrees to charge the various proponents a road use fee to cover maintenance and deterioration of the road assets.

Further, Council cannot support access arrangements for Neoen while restricting similar access requests from other proponents.

Therefore, Council's current position is an objection to the OSOM movements proposed by the Thunderbolt Wind Farm.

3. In March 2025, Transport for NSW undertook an inspection and structural assessment of Keys Bridge over the Hunter River on Bengalla Link Road. The inspection 'revealed significant structural concerns' with the bridge.

Staff will raise this matter with EnergyCo and continue to liaise with Transport for NSW; however, in its current condition, Keys Bridge is considered unsuitable for ongoing OSOM movements associated with the New England REZ.

Biodiversity

4. As described in Section 6.3 of the Modification Report, a Biodiversity Development Assessment Report (BDAR) has been prepared. MOD1 has the potential to result in further impacts on the biodiversity values of adjacent land and biodiversity credits are required to offset these impacts.

Staff supports the delivery of offsets through the recently published Hunter Conservation Strategy (DCCEEW, 2025), to ensure that offsetting is strategic, aligned with regional conservation priorities and where possible, realised within the Muswellbrook LGA.

Council (Staff) appreciates the opportunity to comment and would be pleased to provide additional information, if requested. Should you need to discuss any of the above, please contact Theresa Folpp, Environmental Planning Officer on 02 6549 3700 or email council@muswellbrook.nsw.gov.au.

Yours faithfully



Sharon Pope
Director Environment and Planning