

Attn: Erin Matarazzo
Department of Planning, Housing and Infrastructure
Energy, Resources & Industry Assessments
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

Dear Ms Matarazzo,

**TAMWORTH REGIONAL COUNCIL SUBMISSION – STATE SIGNIFICANT DEVELOPMENT –
THUNDERBOLT WIND FARM - MODIFICATION 1 – SSD-10807896-MOD-1**

Ref: *jk/SL Document Set* [3025843](#)

Tamworth Regional Council (TRC) welcomes the opportunity to comment on the Thunderbolt Wind Farm – Modification 1 (Transport Route) (SSD-10807896-Mod-1), exhibited from 3 December 2025 to 17 December 2025. Council has reviewed the Modification Report (November 2025), including the Revised Project Description and supporting technical appendices, together with our earlier submission on the Thunderbolt Wind Farm EIS dated 27 June 2022.

Our comments below relate specifically to the scope of Modification 1, namely:

- Provision of an alternative component transport arrangement to allow delivery of full-length ~90 m blades from Port of Newcastle to the Project via Muswellbrook and Tamworth, including associated road works at 12 locations along the proposed delivery route.
- Ancillary vegetation clearing at the New England Highway / site access intersection to improve sight distance (no change to the approved intersection form).
- Minor associated changes to construction timeframes and traffic volumes.

TRC notes that no changes are proposed to the approved turbine layout, generation capacity, or on-site infrastructure arrangement, and that the additional disturbance footprint (approx. 7.23 ha, including 1.24 ha native vegetation along the transport route) is largely confined to the existing road corridor and previously disturbed agricultural land.

COUNCIL'S OVERALL POSITION

TRC remains generally supportive of renewable energy development in the New England Renewable Energy Zone, consistent with Council's Blueprint 100 and the New England North-West Regional Plan. Our broader, largely neutral position on the approved Thunderbolt Wind Farm, and the issues raised in TRC's 2022 EIS submission, remain unchanged and should be read in conjunction with this letter.

In relation to **Modification 1**, Council:

- Does not object in principle to the proposed transport route modification; but
- Seeks a series of additional conditions and clarifications to ensure road safety, pavement protection, vegetation management and community amenity outcomes are adequately managed within Tamworth LGA.

Subject to the conditions outlined below, TRC is satisfied that the proposed modification can be accommodated on the local network.

KEY ISSUES FOR TAMWORTH REGIONAL COUNCIL

1. Traffic, Transport and Road Safety

TRC acknowledges the detailed Traffic and Transport Assessment (May 2025) and OSOM Noise Assessment, which conclude that, with mitigation, the modified construction traffic and OSOM movements will result in minor impacts to the external road network.

For Tamworth LGA, the key elements of Route 2 are:

- New England Highway – Whitehouse Lane – Marsden Park Road – O'Briens Lane – Nundle Road – New England Highway, and
- Associated hardstand, signage and vegetation clearing works at key intersections, particularly New England Highway / Whitehouse Lane, Whitehouse Lane / Marsden Park Road, Marsden Park Road / O'Briens Lane, and O'Briens Lane / Nundle Road.

Council's principal concerns relate to:

Geometric constraints and safety on local rural roads

- Whitehouse Lane, Marsden Park Road and O'Briens Lane are narrow, rural standard roads with limited shoulders and mixed traffic, including school buses, agricultural machinery and livestock movements.
- OSOM swept-path requirements and hardstand widening at intersections increase the risk of conflict with general traffic if not tightly managed.

Increased construction traffic and pavement wear

- While overall construction traffic is now spread over approximately 40 months, there remains a concentrated period of higher heavy-vehicle activity, including water carting, internal materials and OSOM deliveries.
- TRC seeks assurance that any accelerated pavement deterioration on Council roads will be fully funded and rectified by the proponent.

Interaction with local events and school bus operations

- The modified route intersects with key approaches used during major regional events (e.g. AELEC events, Tamworth Country Music Festival) as well as daily school bus services.

Sight distance and safety at New England Highway / Whitehouse Lane and site access

- TRC supports the proposed removal of vegetation at the New England Highway / site access location to address Transport for NSW's safety concerns but seeks that final design and clearing limits are agreed with both TfNSW and TRC.

Council requests that the Department incorporates conditions requiring:

- Pre- and post-construction dilapidation surveys covering all Council-managed roads and any road reserve(s) proposed to be transferred to Council that are used by construction and OSOM traffic in Tamworth LGA (at minimum: Whitehouse Lane, Marsden Park Road, O'Briens Lane and Nundle Road).
- A binding Road Maintenance and Restoration Agreement between the proponent, TfNSW and TRC, based on those dilapidation surveys and the pavement loading analysis, to ensure that any damage is rectified to at least pre-construction standard at the proponent's cost.
- Final detailed swept-path and intersection designs (including hardstand extents, pole and sign relocations, drainage and batter treatments) to be prepared in consultation with the relevant road authorities, namely TfNSW and TRC. Any works shall be subject to section 138 approval/concurrence from the respective road authority prior to the commencement of road works.
- A Construction Traffic and OSOM Management Plan, to be endorsed by TfNSW, NSW Police and affected Councils, which:
 - avoids OSOM movements during school bus pick-up and drop-off windows on Whitehouse Lane and Nundle Road
 - avoids OSOM and peak heavy-vehicle movements during major events (e.g. AELEC and Tamworth Country Music Festival periods) where they would materially impact network performance
 - provides for advisory "trucks turning" and other warning signage at key intersections and along the OSOM route.

These requirements are consistent with, and build upon, the mitigation measures already proposed by the proponent.

2. Interaction With EnergyCo and Other REZ Proponent Road Upgrades

TRC notes that EnergyCo, as part of its New England REZ enabling works program, has identified and proposed upgrades along the broader corridor encompassing Whitehouse Lane, Marsden Park Road, O'Brien's Lane and Nundle Road. In parallel, several fast-mover generation proponents within the New England REZ are progressing their own road upgrade designs involving the same corridor to support component delivery and construction access for their respective projects.

At present, the timing, sequencing and extent of these overlapping upgrades remains uncertain. Depending on how project staging aligns, the Thunderbolt Wind Farm may experience:

- Positive benefits, where EnergyCo or other proponents complete enabling works in advance, reducing the extent of traffic management or road widening required specifically for Thunderbolt; or
- Significant operational challenges, where concurrent roadworks, detours, OSOM movements or temporary closures create cumulative congestion, safety risks or duplication of construction activity along the same route.

This corridor is expected to carry increasing construction traffic over the coming years as multiple projects progress through their REZ delivery timelines. Without coordinated planning, the risk of traffic bottlenecks, overlapping detours, conflicting traffic management measures and additional community impact is considerable.

Council Position

To manage these cumulative risks, TRC requests that the Department:

- Require the Thunderbolt Wind Farm proponent to actively coordinate with EnergyCo, respective road authorities and other REZ and non REZ developers on the timing, staging and scope of planned road upgrades affecting the shared corridor.
- Mandate that the project's Construction Traffic Management Plan (CTMP) explicitly demonstrate:
 - How Thunderbolt Wind Farm construction traffic (including OSOM deliveries) will integrate with EnergyCo-led detours, REZ enabling works, and other proponents' roadworks.
 - How potential conflicts in construction traffic flows, temporary closures or traffic control points will be avoided or mitigated.
 - How the proponent will adapt to changing REZ-stage sequencing to prevent cumulative congestion, duplication of works, or excessive community disruption.
- Recommend that cumulative transport impacts be incorporated into a regional traffic coordination mechanism, potentially led by EnergyCo or TfNSW, to ensure:
 - Shared forward works planning;
 - A single view of multi-proponent roadworks and traffic management in the corridor;

- Clear communication channels for Councils and community; and
- Mitigation of cumulative construction traffic impacts across the broader REZ road network.

TRC emphasises that a coordinated regional framework is the most effective means of ensuring that local and state road corridors remain safe, functional and resilient during the delivery of multiple overlapping renewable energy projects within the New England REZ.

3. Vegetation Clearing and Biodiversity Values

Council notes that the Modification 1 BDAR identifies approximately 1.24 ha of native vegetation and associated threatened species habitat along the transport route that will be impacted by hardstand construction and blade-sweep clearing at 12 locations, with the balance of the 3.87 ha vegetation disturbance comprising exotic or highly modified vegetation.

While the overall scale is modest relative to the broader Project, roadside vegetation performs important connectivity and habitat functions (including for koala, squirrel glider and nocturnal raptors), and is difficult to reinstate once removed.

TRC therefore requests that conditions require:

- Demonstrated avoidance and minimisation at each work site (e.g. tight hardstand footprints, selective trimming rather than wholesale clearing where safe and feasible).
- Preparation and implementation of a Roadside Vegetation Management and Restoration Plan, developed in consultation with TRC, addressing:
 - replanting with locally endemic species, including along Whitehouse Lane, Marsden Park Road and at the New England Highway access;
 - maintenance of plantings for a defined establishment period; and
 - integration with any broader koala and biodiversity strategies for the locality.

TRC supports the proponent's commitment to retire the required biodiversity credits under the Biodiversity Conservation Act, including via Biodiversity Stewardship Agreements associated with the Project.

4. Noise And Amenity Along the OSOM Bypass Route

The Traffic Noise Assessments indicate that, even with revised construction traffic volumes and OSOM bypass routes, predicted road traffic noise at the closest sensitive receivers will comply with the NSW Road Noise Policy criteria, with a minor increase in predicted levels (e.g. from 50 to 51 dB(A)).

Nevertheless, TRC is conscious that OSOM movements will pass very close to a small number of rural dwellings along the bypass route, and that residents will experience temporary but repeated disruptions during the blade delivery program.

Council requests that the Department condition:

- A requirement for direct notification to all affected residents along the OSOM route at least 48 hours prior to each OSOM delivery window (SMS, email or letterbox drop).
- Provision of a weekly look-ahead schedule for OSOM and high-volume construction traffic on the project website and via a subscription email list.
- Night-time OSOM movements to be avoided wherever practicable and only undertaken where necessary for safety reasons and in consultation with TfNSW, NSW Police and TRC.

RELATIONSHIP TO TRC'S ORIGINAL EIS SUBMISSION

TRC's 2022 submission on the Thunderbolt Wind Farm raised broader issues regarding biodiversity impacts, community benefit arrangements, residential amenity, decommissioning, aviation safety, local jobs, electricity pricing, traffic and stormwater management.

TRC acknowledges that Modification 1 does not materially change:

- The approved turbine number, layout, heights or lighting;
- The community benefit fund concept or potential Voluntary Planning Agreement; and
- The decommissioning framework and associated waste management approach.

Council therefore requests that:

- The Department continues to have regard to the issues in TRC's June 2022 submission when considering any further conditions or variations to the Project; and
- Any future modification or post-approval process that materially changes these aspects provides an opportunity for TRC and the community to comment.

RECOMMENDED CONDITIONS

In summary, TRC requests that the Department apply conditions to Modification 1 that:

1. Require detailed road and intersection design, swept-path analysis and safety audit for all modified intersections and hardstand areas in Tamworth LGA, to be endorsed by the respective road authority prior to works.
2. Prior to any construction works occurring in any road reserve that the applicant is required to obtain a section 138 approval/concurrence from the respective road authority.
3. Secure pre- and post-construction road dilapidation surveys and a binding agreement for full rehabilitation of any damage to Council roads or road reserves proposed to be transferred to Council attributable to the project.

4. Mandate a Construction Traffic and OSOM Management Plan that addresses:
 - OSOM scheduling relative to school buses and major events;
 - escorting requirements and temporary traffic controls; and
 - advisory signage and speed management.
5. Require a Roadside Vegetation Management and Restoration Plan for all clearing associated with the modified transport route in Tamworth LGA.
6. Require proactive resident notification of OSOM and peak heavy-vehicle movements, including for any works outside standard construction hours.

CONCLUSION

TRC recognises the importance of the Thunderbolt Wind Farm to the New England REZ and the State's renewable energy targets. We understand the practical need to revise the transport route to enable full-length blade delivery. TRC remains supportive of renewable energy projects but requests that the Department ensure the above matters are resolved via enforceable consent conditions. Thank you again for the opportunity to comment. Should the Department require further clarification on any of the above items, please contact Jordan Kirk, Renewable Energy Project Coordinator, Tamworth Regional Council

Regards,



Sam Lobsey
Manager, Development

Contact: Jordan Kirk on 0459 602 607 or Jordan.Kirk@tamworth.nsw.gov.au

24 December 2025