

30 January 2026

Rachel O'Hara
Environmental Assessment and Planning
Department of Planning, Housing and Infrastructure

Dear Ms O'Hara,

**New England REZ Transmission Line (SSI-74175972) – Muswellbrook Shire Council
(Staff) comments on Revised Scoping Report**

Reference is made to the following:

- *'New England Renewable Energy Zone Network Infrastructure Project Revised Scoping Report'* (EnergyCo, December 2025) (Revised Scoping Report); and
- Request to provide advice for the Revised Scoping Report for the New England REZ Transmission Project (SSI-74175972) via the Major Projects Portal.

The Energy Corporation of NSW (EnergyCo) is seeking approval for the construction and operation of new high voltage electricity network infrastructure to connect energy generation and storage projects within the New England Renewable Energy Zone (REZ) to the existing network adjacent Bayswater Power Station.

Within the Muswellbrook Local Government Area, the relevant project components include a dual 500kV transmission corridor with associated infrastructure and an extension of the existing substation at Bayswater Power Station to connect the 500 kV transmission lines to the National Energy Market (NEM) including ancillary development to support the Project.

Staff have reviewed the Revised Scoping Report and provide the following input.

Use of Council Local Roads

1. It is noted that the Environmental Impact Statement (EIS) will include detailed assessment of key transport routes. EnergyCo is currently liaising with Council Staff regarding the use of several local roads, including Muscle Creek Road, Beggary Creek Road, Inglewood Road, Hebden Road, Antienne Road, Stoney Creek Road, and Albano Road. The Revised Scoping Report does not individually name any roads. The EIS should include confirmation of roads to be used in the key transport routes.
2. It is understood that interfaces with the abovementioned roads will be managed via a Third-Party Agreement being developed between Muswellbrook Shire Council and EnergyCo.
3. Some of the abovementioned roads are proposed to be used for access to construct other renewable energy projects and the Muswellbrook Bypass and their cumulative use may warrant upgrades. Apportioning the cost of maintenance or upgrades across multiple parties is complex. Staff are in the process of commissioning a Contributions Plan which will include a dilapidation study of Muscle Creek Road to the intersection of

Inglewood Road. The preferred mechanism of contribution is yet to be confirmed but will likely be assessed on a per kilometre / per vehicle metric.

4. Staff note that formal comments on the *New England REZ Road Upgrade Detailed Design Report* (Aurecon, 2025) are still outstanding. The Detailed Design Report relates to Option 1b (Wybong Road east, Kayuga Road, Invermein Street and Stair Street), Appendix A outlines a list of issues that remain unresolved.

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.

5. Council's 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.

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

7. The intersection of the New England Highway and Hebden Road is currently utilised by Australian Rail Track Corporation and existing landowners and businesses in the Lake Liddell & Hebden area, and is also proposed to support multiple major projects, including the Hunter Central Coast Renewable Energy Zone infrastructure, the New England Renewable Energy Zone Transmission Line, and the Hunter Transmission Project (HTP).

The HTP EIS predicts the intersection with the NE Highway will fail during both weekday AM and PM peak periods for right-turn movements from Hebden Road onto the New England Highway. In response, EnergyCo (as part of the HTP) has proposed mitigation measures that restrict construction traffic to left-out movements during the AM peak and right-in movements during the PM peak period.

Staff do not support this treatment because it relies on short-term operational restrictions, does not adequately address the underlying safety and capacity constraints, and fails to deliver strategic legacy outcomes that would support cumulative traffic demands, long-term network performance, and future economic activity in the Lake Liddell precinct.

A potential treatment for the intersection could be achieved through line marking to provide a sheltered right-turn lane (or modified seagull) for vehicles exiting Hebden Road and entering the New England Highway (see Figure 1 and Figure 2). Similar treatments have been implemented at other intersections, including Broke Road, and would improve safety and operational efficiency for both construction traffic and ongoing local movements, particularly visitors to the GJs by the Lake facility.

Notably, similar concerns regarding this intersection have historically been raised by TfNSW when GJs by the Lake have proposed events at their facilities off Hebden Road – TfNSW had concerns about the absence of a safe acceleration and merging opportunity for northbound movements towards Muswellbrook, given the high operating speeds on the New England Highway.

The changes would also lengthen the right turn bay into Hebden Rd improving queuing capacity for any construction vehicles.



Figure 1 - Existing Intersection Line Marking (Hebden Road / NEH)



Figure 2 - Proposed Line Marking Treatment for Intersection (Hebden Road / NEH)

8. Staff note that EnergyCo have provided draft terms for an easement acquisition at Stair Street.

Proposed Realignment to Minimise Impact on Remnant Vegetation

9. The revised alignment appears to disturb remnant vegetation on the AGL site adjacent to the New England Highway, exposing the travelling public to more views of multiple power lines and industrial infrastructure, which is not ideal as the gateway to

Muswellbrook. The loss of vegetation will also diminish effectiveness of existing wildlife corridors in this location. Staff would like to see an assessment of locating the alignment further west toward the Liddell Ash Dam and Maxwell Mine voids to avoid the remnant vegetation. The landscape further west lacks vegetation cover and is considered a denuded landscape as it is mining rehabilitation with two historic voids. See image below with the alternate alignment option shown by the red polygon.



Cumulative Impacts

Workforce Accommodation and Housing

The 'Workforce Accommodation Study New England Regional Major Infrastructure Studies' undertaken by Urbis for Energy Co found that the median residential vacancy in the Muswellbrook LGA was 0.9% and that the Muswellbrook LGA had the highest median rents across all areas included in the study. This demonstrates that Muswellbrook has little capacity to accommodate an influx of a temporary workforce without a TWA. The study also indicated that accommodation requirements would continue after construction of projects had ceased to accommodate the new workers required for these facilities.

10. The Revised Scoping report confirms that Temporary Workforce Accommodation (TWA) will be required, and it is preferable that the TWA 'be located on previously disturbed land at a reasonable distance from houses, watercourses and/or drainage lines and close to the transmission corridors' (Revised Scoping Report, Section 3.3.3).

Council Staff have had a 'Temporary Workforce Accommodation Site Suitability Assessment' (Astrolabe Group, 2025) prepared which will be provided for the preparation of the EIS. It is expected that the locations suggested in the Site Suitability Assessment will be considered.

As the Site Suitability Assessment assesses privately held land parcels it should be treated as a confidential document that was prepared for use by Council and EnergyCo.

11. Council continues to request that any TWA leave a legacy for the community, in accordance with its *Temporary Workforce Accommodation Policy (MSC082E)*.

Water Demand

12. To understand the cumulative demand for water, Staff request an estimate of water volumes required for construction activities and temporary worker accommodation, and how this is expected to be sourced, be included in the EIS.
13. Staff are developing a strategy to enable project proponents to use recycled water from Council's wastewater management facility for construction activities where potable water is not required. Consultation should be undertaken with Council where non-potable water is required to be imported to site.

Social and Employment

The cumulative impact of the 'transition' will significantly affect local services, infrastructure, and housing including strain on emergency services, and the need for more classrooms, as highlighted in the report '*Managing the impacts of State Significant Development*', prepared for the Mid-Western Regional Council in 2023. In addition, Staff are also concerned about impacts to healthcare, schools and childcare availability.

14. The impacts of the cumulative construction workforce on social and community services should be assessed. It is also noted that these matters do not appear to be addressed within the Regional Major Infrastructure Studies.
15. The Proponent should consider partnering with local organisations to implement an employment program for First Nations people (e.g. St Helliers Correctional Centre).
16. A local procurement strategy should be prepared in consultation with Council including a target of 10% of required goods/services supplied by local businesses within 50km of the site.
17. Council calls for key state and federal agencies, including EnergyCo, the Net Zero Economy Authority, the Future Jobs and Investment Authority, the Department of Employment and Workplace Relations, the Department of Transport and the Department of Planning, to establish a physical presence in regional communities at the coalface of economic transition.

This position is supported by a Council motion that received strong backing from delegates across NSW at the Local Government NSW Annual Conference, reflecting a shared view that the next phase of transition for coal-mining communities must be shaped locally.

Council has already taken proactive steps to attract transition agencies, including earmarking a dedicated Muswellbrook Energy and Resources Centre within the Hunter Innovation Precinct in the Muswellbrook Central Business District, demonstrating local readiness to host and support embedded decision-makers.

Community Benefit Sharing

18. As stated in Section 1.7.1 of the Revised Scoping Report, 'EnergyCo is developing a Community and Employment Benefit Program to ensure regional communities receive long-term benefits from the energy transition'.

The EIS should identify proposed community benefit sharing offers that align with Councils recently adopted *Muswellbrook Shire Community Benefit Fund Policy* (MSC052E), available on Council's public website.

Offsets

19. Council has noted with other Major Projects, that potential biodiversity offset sites to replace disturbed threatened vegetation often falls outside the Muswellbrook LGA, so this mechanism inadequately addresses local ecological impacts.

Staff support the delivery of offsets as per 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.

Co-Location with Bowmans Creek Wind Farm Stage 2 Transmission Line

20. Stage 1 of the Bowmans Creek Wind Farm is approved to locate transmission line infrastructure in the road corridor of Hebden Road, with separate licence agreements required with Muswellbrook and Singleton Shire Councils. For a range of reasons this is not an ideal solution.

Staff have requested the proponent of the Bowmans Creek Wind Farm, investigate the option of co-locating the transmission line with the adjacent NE REZ transmission line. This would be beneficial in terms of minimising land disturbance in the locality and impacts on public road infrastructure.

Impacts to Adjoining Land

21. Any land that will require planning controls/restrictions on new uses must be communicated to Staff, so issues are adequately identified on planning certificates and in development assessment.

Council Staff appreciate the opportunity to comment and would be pleased to provide additional information if requested. Should you need to discuss the above, please contact Tracy Ward, Environmental Planning Officer on 02 6549 3700 or email council@muswellbrook.nsw.gov.au.

Yours faithfully



Sharon Pope
Director Environment and Planning

30 January 2026

Attachment A - Matters to address for Option 1b (P2R NE) for the transport of Over Size Over Mass (OSOM) loads – Wybong Road (east), Kayuga Road, Stair Street

For Option 1b – if not reclassified as State Road, Council will need to enter into an Infrastructure Maintenance Agreement with EnergyCo and proponents who have sites inside and outside the NE REZ. A Development Contributions Plan, similar to the Thomas Mitchell Drive Contributions Plan, may be required to recover the cost of maintenance attributable to their use by multiple proponents. 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 of these reasons Council is unlikely to support Option 1b if not classified as a State Rd or unless the State Gov agrees to charge the various proponents road use fee to cover maintenance and deterioration of the road assets.

A. Transport Issues**1. Infrastructure Constraints**

- a) Blade size limitation – The maximum turbine blade/load length that can be accommodated because of the proposed road upgrades should be identified and available to transport companies.
- b) Cumulative Impact Assessment – Modelling should occur to consider cumulative impacts of multiple projects using the route simultaneously and establish thresholds for acceptable number of traffic movements. Alternatively, set a maximum number of daily and weekly movements based on impact on community and other road users.
- c) Road condition limitations – Narrow pavement width, unsealed shoulders, poor pavement condition, poor drainage, may require traffic management in a TARP (Trigger Action Response Plan) format to manage use of the route following adverse weather events, traffic accidents on the route, traffic congestion due to traffic accidents on the Golden Hwy and adjoining roads resulting in diverted traffic onto the route, periodic road maintenance, emergency road maintenance etc.
- d) Accelerated asset deterioration - Acknowledge the risk of accelerated wear and tear on road surfaces and supporting infrastructure and make good.
- e) 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 continue to liaise with EnergyCo and Transport for NSW; however, in its current condition, Keys Bridge is considered unsuitable for ongoing OSOM movements associated with the New England REZ.

2. Safety and Community Impacts

- a) Public safety risk - Consider safety risks to residents and workers in adjacent businesses.
- b) Management of OSOM movements that may conflict with shift changes and business operations for:
 - Mt Arthur Mine;

- Bengalla Mine;
 - Mt Pleasant Mine;
 - Mangoola Mine;
 - Dartbrook Underground Mine;
- c) Communication Strategy - Develop a clear communication strategy for impacted residents, local road users and OSOM transport companies.
 - d) Amenity impacts - Assess and mitigate impacts such as traffic noise, flashing lights, and disruption, particularly where night-time OSOM movements are proposed.
 - e) Motorist behaviour change - Consider potential changes to driver behaviour (e.g. “rat runs”) resulting from improved road conditions.

3. Legal, Maintenance and Access Responsibilities

- a) Maintenance obligations - Confirm maintenance responsibilities for road sections that mining proponents are required to maintain under development consent conditions (e.g. Bengalla and Mt Pleasant Mines on Bengalla Link Road and Wybong Road).
- b) Access restrictions - confirm access restrictions where road use is prohibited by a development consent (e.g. Dartbrook Mine is currently prohibited from using Kayuga Road).

4. Strategic and Long-Term Considerations

- a) Future asset value and cost - Clarify who bears responsibility for future asset value loss and long-term maintenance following the upgrade.
- b) Escort resources - Define Council's role in escorting OSOM loads and introduce mechanisms to require transport companies to ensure road/street furniture and signs are in good order after each OSOM movement.
- c) Community Benefit sharing – Movements will impact local residents and businesses but not return any economic benefit to the area.