

12 December 2025

SUBMITTED VIA NSW PLANNING PORTAL

Director – Energy Assessments
NSW Department of Planning, Housing and Infrastructure

RE: THUNDERBOLT WIND FARM SSD-10807896 – MOD 1 TRANSPORT – SUBMISSION

Dear Director – Energy Assessments,

This letter provides a submission from MACH Energy Australia Pty Ltd (MACH) on the Modification application (MOD 1) to the Thunderbolt Wind Farm SSD-1087896 lodged by Neoen Australia Pty Ltd (Neoen).

Background

MACH is the majority owner of the Mount Pleasant Operation, an open cut coal mine and associated infrastructure, located approximately 3 kilometres north-west of Muswellbrook in the Muswellbrook Shire Local Government Area (LGA) of New South Wales (NSW).

The Mount Pleasant Operation currently employs approximately 700 full-time equivalent personnel and the site operates 24 hours per day, seven days per week.

The Mount Pleasant Operation operates in accordance with two Development Consents (DA 92/97 and SSD 10418) and a suite of approved environmental management plans, including a Traffic Management Plan.

Further information on the Mount Pleasant Operation and its management plans is available on MACH's website: <https://machenergyaustralia.com.au/mount-pleasant/documentation/>.

The main roads connecting the New England Highway to the Mount Pleasant Operation are Thomas Mitchell Drive, Denman Road, Bengalla Road, and Wybong Road. Denman Road, Bengalla Road and Wybong Road are located on both the primary and secondary oversize-overmass (OSOM) transport routes proposed for the Thunderbolt Wind Farm.

Stakeholder Engagement

MACH has not had any recent engagement from Neoen on the Thunderbolt Wind Farm, with the most recent engagement in December 2024. Neoen did not notify MACH of this MOD 1 application until after lodgement.

The main focus of discussions up to December 2024 was to negotiate an access agreement for land that MACH owns on the corner of Kayuga and Wybong Roads, Muswellbrook. Terms for access were agreed however the proponent elected not to proceed with the agreement.

The lack of proactive engagement by Neoen underscores the need for the Development Consent to require ongoing engagement with affected operations.

Interactions with OSOM Movements

MACH is not opposed to renewable energy developments and recognises that current haulage routes to enable these developments to proceed will require the use of secondary roads until the Muswellbrook bypass is constructed. MACH has been co-operative and responsive to requests to access its property, first with Neoen and other developers for a private access agreement and now with EnergyCo for acquisition. Notwithstanding, we have made it clear that impacts on our approved operation must be managed. MACH remains concerned about the potential for OSOM movements generated by the Thunderbolt Wind Farm construction activities to materially impact on our operations, including the safety of our employees and contractors on the road network and access to the site during emergencies.

MACH notes that the Traffic and Transport Assessment includes Appendix A – Preliminary Transport Route Assessment, which contains a document entitled *OSOM Transport Management Plan* prepared by ARES Project Services Pty Ltd (ARES).

The document prepared by ARES includes a number of mitigations and controls to manage the interactions with the Mount Pleasant Operation and neighbouring mining operations, including maintaining emergency access, coordinating OSOM movements to avoid interaction with peak employee movements associated with shift changes and other operational considerations, such as co-ordinating haulage with temporary road closures for blasting.

The mitigations and controls recommended by ARES do not appear to have been committed to by Neoen in its Modification Report or its consolidated summary of mitigation measures in Appendix 4 of the Modification Report.

The Mount Pleasant Operation, and other significant operations, that may interact with OSOM movements have also been excluded from consideration of potential cumulative impacts and interactions (i.e. have been excluded from consideration in the ‘Cumulative Impacts Table’ in Appendix 8).

To provide certainty that appropriate mitigations and controls will be implemented by Neoen, MACH kindly requests additional conditions within SSD-1087896.

1. Improvement in Transparency on the Timeframe for OSOM Movements

MACH’s ability to plan for, and manage, OSOM movements would be improved if there was transparency around the timing that OSOM movements will commence in practice. This would allow for additional safety-related discussions with employees and contractors in ‘Toolbox Talks’ to highlight the additional care required on Denman Road, Bengalla Road and Wybong Road during the period of OSOM movements.

Conditions of Consent could be included in Part A to require notification of the date of commencement of OSOM vehicle movements at least four weeks before that date.

At a minimum, this notification should be required to be made through the NSW Planning Portal, but MACH also requests this notification requirement extends to Council, MACH and other affected operations along the OSOM route.

2. *Strengthening of Operating Conditions*

The recommendations made by ARES that have not been captured in the Modification Report or Neoen's commitments should be reflected in the conditions of consent.

Condition B33 of the Consent (Transport Operating Conditions) should be updated to include the requirement that the Applicant must ensure:

- priority access is to be given for emergency services to Mount Pleasant Operation at all times;
- OSOM deliveries are scheduled to avoid Bengalla Road and Wybong Road during periods of peak traffic movements associated with shift changes at Mount Pleasant Operation; and
- all reasonable steps are undertaken to minimise dust emissions associated with OSOM movements.

If additional layover areas are required by Neoen to meet the above requirements, these should be constructed at Neoen's cost.

3. *Requirements to Consult on the Traffic Management Plan*

As noted above, the level of engagement with Neoen has been sporadic and limited to date. MACH requests it is consulted on the Traffic Management Plan such that interactions between the two developments can be considered in an integrated and collaborative manner.

In addition, the conditions should be strengthened to clarify the requirement to minimise "potential cumulative traffic impacts with other State significant development projects" extends to mining operations.

Condition B34 should be amended to require consultation with the owners of the Mount Pleasant Operation in preparing the Traffic Management Plan (to the extent it relates to OSOM movements).

Condition B34(c)(vi) should be amended to clarify it requires "minimising potential cumulative traffic impacts with other State significant development projects in the area, including mining operations located along the heavy vehicle route"

Road Maintenance

It is noted that Condition B103 of Mount Pleasant Operations' Development Consent SSD 10418 requires:

During the development, the Applicant must maintain the roads and intersections between the Bengalla Mine main entrance and the Mount Pleasant Mine main entrance, including:

- (a) part of the Bengalla Link Road; and
- (b) part of the Wybong Road.

Condition B32 should recognise that any repair and/or make good on any development-related damage identified on portions of road identified in SSD 10418 should occur in consultation with MACH, as the current relevant entity responsible for maintenance of these roads.

The ARES report recommends on page 45:

There are a number of bridges on the [Muswellbrook] bypass route. These will need to be structurally assessed by the project via non-intrusive methods both before and after the transportation of OSOM components to assess any impacts to their structural integrity.

Condition B32 should be updated to include the requirement for structural assessments of the bridges on the “Muswellbrook bypass” section of the heavy vehicle route (i.e. on Bengalla, Wybong and Kayuga Roads).

Please do not hesitate to contact the undersigned should you wish to discuss these matters further.

Yours sincerely,



Chris Lauritzen

General Manager – Resources Development
MACH Energy Australia Pty Ltd.