



Bengalla Mining Company Pty Ltd

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

Via NSW Planning Portal

Dear Sir / Madam

Thunderbolt Wind Farm SSD 10807896 – Modification 1 Transport - Submission

This letter provides a submission from Bengalla Mining Company Pty Ltd (**BMC**) in response to the modification application (**Mod 1**) to the Thunderbolt Wind Farm SSD-1087896 (**Thunderbolt Consent**) lodged by Neoen Australia Pty Ltd (**Neoen**).

1. Background

- 1.1 BMC currently operates the Bengalla Mine on behalf of the Bengalla Joint Venture (New Hope 80%, Taipower 20%). Bengalla is an open cut coal mining operation located approximately 5km to the west of Muswellbrook, NSW.
- 1.2 The Bengalla Mine is operated in accordance with the State significant development consent SSD-5170, granted in 2015 (**Bengalla Consent**).
- 1.3 The Bengalla Mine currently employs approximately 900 full-time equivalent personnel and the site operates 24 hours per day, seven days per week. Mining operations are approved to be carried out until 28 February 2039.
- 1.4 The main roads connecting the New England Highway to the Bengalla Mine are Bengalla Link Road, Denman Road, and Wybong Road. Although the Bengalla Mine transports all coal by rail, its operations rely on these roads for the transport of goods, machinery and its workforce, to and from the site. These roads are all located on both the primary and secondary oversize-overmass (**OSOM**) transport routes proposed to be used for the construction of the Thunderbolt Wind Farm.
- 1.5 BMC does not oppose the Thunderbolt Project or Mod 1, however has concerns about the potential for the modified transport route and proposed extended construction phase of 40 months to impact on the approved operations at Bengalla Mine. Accordingly, BMC requests that the potential impacts on the operations at Bengalla Mine associated with Mod 1 are considered and mitigated through appropriate conditions of consent. A summary of BMC's concerns are set out below.

2. Maintenance of Bengalla Link Road

- 2.1 BMC constructed the Bengalla Link Road, and the Bengalla Consent anticipates its relocation west as the mine progresses.
- 2.2 BMC currently pays an annual monetary contribution under a Voluntary Planning Agreement (required under a condition of the Bengalla Consent) to Muswellbrook Shire Council for the

purpose of road maintenance in the Muswellbrook LGA. It is also responsible for the maintenance of the Bengalla Link Road from the intersection with Denman Road to the entry into the Bengalla Mine. This section of road includes Keyes bridge which has structural limitations.

2.3 BMC notes that Condition B32 of the Thunderbolt Consent currently requires:

- an independent dilapidation survey, which considers Bengalla Link Road and Wybong Road (among others), to be prepared before and after construction of the Thunderbolt Wind Farm, and
- the proponent to repair and/or make good any development-related damage identified in the survey within 2 months.

2.4 BMC supports this condition in principle, but requests that any repair or make good of Bengalla Link Road (in particular) is carried out in consultation with BMC to ensure mining operations are not impacted by any repair works.

3. Interaction with OSOM movements

3.1 BMC holds concerns about the potential for the OSOM movements associated with the construction of the Thunderbolt Wind Farm to impact on the operations of the Bengalla Mine. Specifically, those concerns relate to potential interference with the use of Bengalla Link Road, Denman Road and Wybong Road.

3.2 Appendix 7 to the Mod 1 application, being the Traffic and Transport Assessment dated May 2025 includes at Appendix A, an 'OSOM Transport Management Plan' (TMP) prepared by ARES Project Services Pty Ltd. The TMP includes several proposed mitigation and control measures to manage the interactions with the Bengalla Mine 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. BMC considers that these proposed mitigation measures are the minimum measures required to manage the impact of the OSOM movements on the operation of Bengalla Mine and suggest the mitigation measures be included as a condition of consent or approved TMP if Mod 1 is approved.

3.3 Condition B34 of the Thunderbolt Consent requires a Traffic Management Plan to be prepared in consultation with Transport for NSW and Councils. BMC supports the current Condition B34(c)(vi) which requires the TMP to detail the measures that would be taken to minimise potential cumulative traffic impacts with other SSD projects in the area. BMC submits that the condition imposed must require the proponent to proactively engage and communicate with BMC about its transport arrangements throughout the construction phase to ensure effective and safe operation of the Bengalla Mine and the local road network.

4. Blasting Road Closures

Bengalla Mine is approved to operate blasting on site between 7 am and 5 pm Monday to Saturday inclusive. Blasting may require intermittent road closures along Bengalla Road in accordance with the approved Blast Management Plan. Accordingly, Neoen will need to engage with BMC about the impacts of road closures associated with blasting when planning its OSOM transport. BMC suggest a condition to that effect be imposed if Mod 1 is approved.

5. Realignment of Bengalla Road

- 5.1 An application to modify the Bengalla Consent (Modification 8), which seeks adjustment to the approved realignment of the Bengalla Link Road, is currently on public exhibition until 4 February 2026.
- 5.2 Subject to obtaining approval of Modification 8, BMC intends to commence construction of the realignment of the Bengalla Link Road in the second half of 2026 for a period of 18 months, which is the same time the Thunderbolt Wind Farm is expected to commence construction. The Bengalla Consent permits construction of the Bengalla Link Road between the hours of 7 am to 6 pm, Monday to Friday and 8 am to 1 pm on Saturdays, which are the same proposed hours of construction for the Thunderbolt Wind Farm.
- 5.3 During the construction phase for the realigned Bengalla Link Road, the following impacts on the operation of the existing road will need to be considered and accommodated by Neoen when planning its OSOM transport:
- Additional construction traffic to and from the construction site, and
 - Traffic modifications at each intersection of the realigned Bengalla Link Road with the existing road.

6. Bengalla Consent

- 6.1 Finally, any conditions of consent imposed for Mod 1 should not contradict the conditions of the Bengalla Consent and should not result in any increase in the cost for BMC in complying with the Bengalla Consent – particularly considering the current funding arrangements for the maintenance of Bengalla Link Road.

If you would like to discuss any aspect of this submissions further, please contact me.

Yours faithfully,



Craig White

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