LIVESTOCK, BULK AND RURAL CARRIERS ASSOCIATION

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28 October 2026

Tamworth OSOM Route

Oversize and Overmass movements and infrastructure investment

Supplementary input by LBRCA.

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Executive summary

The Livestock, Bulk and Rural Carriers Association (LBRCA) welcomes the opportunity to provide feedback on the proposed Tamworth oversize and overmass (OSOM) route, including proposed intersection upgrades and the option to seal currently unsealed sections of Whitehouse Lane and Marsden Park Road, subject to further consultation (EnergyCo 2026, pp. 20-22).

LBRCA supports infrastructure investment that enables economic development, improves road safety and strengthens the regional freight network. We recognise the importance of establishing suitable routes for the transportation of related energy infrastructure to the approved New England Renewable Energy Zone (REZ).

This submission does not express a view in relation to the New England REZ project.

LBRCA has long advocated for better integrated planning in advance of construction within renewable energy zones (REZs), noting the significant impact these REZ related OSOM movements have on:

- road network condition/surfaces
- disruption to the efficiency and reliability of freight movements
- disruption to local communities
- delays for other road users, particularly rural carriers
- the limited structural capacity and condition of sections of the regional NSW road network
- additional maintenance responsibilities and costs for councils and Transport for NSW
- restrictions on rural carriers to manage fatigue and driver welfare
- impact on livestock loading and animal welfare

However, infrastructure developed to accommodate project-specific OSOM movements must not compromise existing access for livestock, grain, bulk and other rural freight operators.

The Tamworth region is an important agricultural production, livestock processing and freight distribution centre. Its road network supports regular heavy vehicle movements connecting farms, saleyards, feedlots, processors, storage facilities and regional markets.

EnergyCo's traffic modelling records approximately 670 vehicles travelling in each direction per day on Whitehouse Lane/Marsden Park Road, with heavy vehicles comprising about 25% of movements. In a worst-case scenario, sealing could increase volumes to approximately 1,020 vehicles in each direction per day, but only if the assumed through traffic diverted and no administrative controls applied (EnergyCo 2026, pp. 20–21).

These movements will continue long after construction of the New England REZ is completed. LBRCA insists that the proposed investments should be assessed not only against the requirements of specialised OSOM movements, but also against its contribution to the safety, capacity and long-term productivity of the regional freight network.

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The September 2026 development report also identifies an existing load limit at Nemingha that discourages ordinary heavy vehicle use while exempting permitted OSOM movements, and confirms that additional OSOM traffic is expected to increase road maintenance requirements (EnergyCo 2026, pp. 21, 27). The view of LBRCA is these reasons underpin the need to protect established freight access and agree maintenance funding as part of delivery.

About LBRCA

LBRCA is the peak body representing the interests of rural carriers moving livestock, bulk and essential freight across regional Australia. LBRCA advocates for a safe, productive and commercially sustainable transport industry.

Our members operate across regional and remote road networks, they rely on heavy vehicle access, appropriately designed infrastructure and regulatory arrangements that recognise the operating requirements of regional freight.

Livestock transport involves additional operational considerations related to animal welfare, loading and unloading arrangements, journey planning, and time-sensitive movements. All drivers must adhere to the various laws and regulations under the Heavy Vehicle National Law, including key fatigue management requirements.

LBRCA has a direct interest in ensuring that infrastructure projects do not create unintended access restrictions, inefficient diversion routes, prolonged delays or additional costs for established rural industries.

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Key position of LBRCA

LBRCA's key consideration is that OSOM movements should not diminish network access or operations for existing users, infrastructure developed to improve access for one freight task should not diminish access for another, and funding must improve long term access and road safety.

LBRCA makes the following recommendations:

1. Preserve existing heavy vehicle access and transparently assess any proposed additional restrictions, including their interaction with the existing Nemingha load limit and the OSOM permit exemption. Restrictions on heavy vehicle access should be demonstrated by engineering or safety.
2. Assess proposed road and intersection designs against contemporary livestock, bulk and higher productivity vehicle configurations, including pavement impact and regular operating requirements.
3. Establish transparent consultation processes for any proposed changes or restrictions on heavy vehicle access.
4. Protect existing freight movements across the region during construction and subsequent OSOM convoy operations.
5. Ensure road upgrades deliver lasting regional freight productivity and safety benefits.
6. Align the project with broader Tamworth Regional Council and Transport for NSW freight network planning.

Project context and regional freight considerations

EnergyCo has identified a route bypassing Tamworth's central business district via Whitehouse Lane, Marsden Park Road, O'Brien's Lane and Nundle Road, reconnecting with the New England Highway near Nemingha. The proposed works include intersection improvements and an option to seal currently unsealed parts of Whitehouse Lane and Marsden Park Road. Sealing remains subject to consultation and advice from Tamworth Regional Council (EnergyCo 2026, pp. 20–22).

LBRCA acknowledges the potential benefits of removing large OSOM movements from the Tamworth urban area and improving sections of the existing road network. However, the project must also account for the different operating characteristics of agricultural freight.

Specialised OSOM vehicles are generally managed through individual route assessments, permits, escorts and coordinated movements. Often these movements are also supported by additional mitigation and risk management procedures and technologies, such as traffic controls, route surveys, swept-path modelling, detailed transport management plans and escort arrangements for higher risk movements (EnergyCo 2026, pp. 30–31). In contrast, livestock and bulk transport operators transporting freight in more common higher productivity vehicles require reliable, recurring access across established networks. These vehicles undertaking a large part of the national and certainly regional freight task often use higher-productivity combinations (for example, B-Doubles) and operate at approved masses and dimensions.

EnergyCo reports that wind turbine blades can be up to 100 metres long and the specialised vehicle and trailer combinations used to transport REZ components can reach 112 metres. These exceptional dimensions explain the need for controlled OSOM operation; they do not establish that the same infrastructure is fit for unrestricted, routine movements by rural freight vehicles (EnergyCo 2026, p. 8).

Investment decisions for roads designed to accommodate exceptional OSOM load should factor in the long-term freight task that should be provided access for these vehicles. For example, the ability to accommodate an exceptionally long or wide load under controlled traffic conditions does not, by itself, establish that an intersection supports regular two-way B-double movements or that associated bridges and pavements are suitable for high-frequency freight operations.

These distinctions should be reflected in the project's technical assessment and design outcomes to future proof the road network and ensure project legacy.

Protect existing heavy vehicle freight access

LBRCA's principal concern is the possibility that road upgrades, infrastructure assessments or subsequent operational arrangements could result in changes to existing heavy vehicle access.

LBRCA does not suggest that EnergyCo or road managers have already determined to introduce permanent restrictions. Rather, we seek assurance that existing access will be explicitly considered and protected throughout the design and approval process. This includes any pre-planning or pre-approved permit systems designed in connection with infrastructure upgrades.

EnergyCo's report confirms that an existing load limit at Nemingha discourages heavy vehicles other than permitted OSOM loads from using the Whitehouse Lane route to rejoin the New England Highway. EnergyCo does not propose removing that load limit. It also lists additional load limits or heavy vehicle restrictions among possible traffic mitigation measures, subject to Tamworth Regional Council's review (EnergyCo 2026, p. 21). LBRCA does not contend that any further restriction has been approved and we seek disclosure of the current engineering position and assessment of other heavy vehicle access. The implications of any new control for existing freight operators could be considered.

We recommend that EnergyCo work with Transport for NSW, Tamworth Regional Council, the National Heavy Vehicle Regulator (NHVR) and any other relevant parties or local governments to establish an existing-access baseline for the affected road network.

This should identify:

- Current notice-based heavy vehicle access arrangements.
- Existing permit-based access, including recurring agricultural freight movements.
- Applicable mass, dimension and vehicle-configuration restrictions.

- The existing Nemingha load limit, its engineering and safety basis, the conditions applying to the OSOM permit exemption, and any proposed additional load limits or restrictions.
- Existing bridge and pavement limitations.
- Roads providing connections to farms, processing facilities, saleyards and other freight destinations.

Where a new temporary restriction is unavoidable, an appropriately approved alternative route should be available before commencement, and its duration and operating conditions communicated in advance. Any proposal for a continuing restriction should be separately justified, consulted upon and subject to a documented freight access impact assessment.

Design infrastructure for contemporary rural freight combinations

The proposed upgrades represent an opportunity to improve the regional freight network beyond the immediate requirements of renewable energy construction. LBRCA recommends that the technical design process consider the needs of commonly used freight combinations, including:

- General access heavy vehicles
- B-doubles
- Relevant PBS-approved combinations
- A-double and other high-productivity combinations where these are currently authorised or represent credible future network requirements

EnergyCo states that Whitehouse Lane's existing pavement has been visually assessed as suitable for OSOM loads, with further geotechnical work underway to verify the assessment. The cost comparison did not include wholesale pavement upgrades on that basis (EnergyCo 2026, p. 27). LBRCA submits that suitability for specially controlled OSOM movements must not be treated as proof of capacity for recurrent, high-frequency livestock and bulk traffic. The final design should test cumulative axle loading (including general mass and PBS access) pavement impact and ongoing maintenance demands, as well as isolated OSOM effects.

This assessment should address intersection swept paths, lane widths,-pavement strength and fatigue, axle loading, bridge capacity, roadside hazards, turning movements and safe interactions with other road users. Where design adjustments could deliver significant ongoing freight benefits, these should be considered before designs are finalised.

Attention should be given to whether the completed infrastructure can support regular freight movements without the traffic controls that may be available for specialised OSOM deliveries.

Case Study: Baiada's Tamworth poultry expansion

The opening of Baiada's Oakburn poultry processing facility in Tamworth demonstrates why regional road infrastructure and heavy vehicle access arrangements must keep pace with major private investment in agricultural production and processing.

The facility has an initial processing capacity of approximately 1.5 million chickens per week, with approval to expand to three million birds per week. This represents a substantial increase over the former Tamworth processing facility, which had a capacity of less than one million birds per week[1].

Baiada previously estimated that approximately 300 additional poultry sheds would be required across the surrounding New England region to support the plant's ultimate processing capacity. This growth is expected to occur through new poultry farms and expansion of existing operations, generally within a two-hour transport radius of Tamworth[2].

Examples include the proposed 16 shed Silverweir Poultry Farm at Appleby, with capacity for 960,000 birds, and AAM Investment Group's proposed 18 shed Bective South farm, designed to accommodate 1,236,150 birds[3]. Together, these two proposed developments alone represent accommodation capacity for approximately 2.2 million birds across 34 poultry sheds. The associated freight requirements are substantial, encompassing the movement of live poultry, grain, feed, bedding materials, farm inputs, poultry litter, processing by-products and finished products.

Substantial growth in agricultural freight demand

The expansion also requires additional feed production. Tangaratta Stockfeeds has proposed an expanded feedmill operation at Wallamore and planning documents provide for a combined production capacity of up to 16,200 tonnes of poultry feed per week, comprising 14,000 tonnes from the proposed new mill and 2,200 tonnes from the retained existing mill. The existing facility had an approved production capacity of 10,000 tonnes per week[4][5].

Earlier estimates identified the potential for approximately 445,000 tonnes of regional grain, pulses and oilseeds annually, with grain expected to be sourced from agricultural regions including Tamworth, Moree, Narrabri, Walgett and Gunnedah.

These figures demonstrate the scale of agricultural supply chains required to support the expansion of poultry processing in the New England region. These developments depend on efficient access for large heavy vehicle combinations capable of transporting substantial volumes of agricultural commodities, feed and livestock.

[1] Grain Central (2026), Baiada opens Tamworth plant headed for 3M birds per week, 17 September 2026.
[2] Grain Central (2024), Baiada moves ahead with Tamworth investments, 16 October 2024.
[3] PSA Consulting (2025), AAM Bective South Poultry Farm - Environmental Impact Assessment, 2 January 2025, p. 62.
[4] NSW Department of Planning, Housing and Infrastructure, Tangaratta Feedmill, State Significant Development SSD-58801472.
[5] PSA Consulting (2025), Tangaratta Feed Mill Modification - Social Impact Assessment, 25 November 2025, pp. 1 and 6.

Quantifiable increases in heavy vehicle activity

The proposed Silverweir Poultry Farm's Traffic Impact Assessment estimates approximately 4,700 heavy vehicle trips annually, averaging approximately 14 trips per day, with up to 38 heavy vehicle trips during peak nighttime bird collection periods[6].

The assessment identifies extensive B-double use for feed deliveries, bird collection, bedding and litter movements. It also includes swept-path assessments for semi-trailers, B-doubles and A-double combinations, demonstrating the importance of designing access infrastructure for larger vehicle configurations.

Similarly, the Bective South Environmental Impact Assessment forecasts approximately 16 heavy vehicle trips per day, increasing to a maximum of 38 trips on peak collection nights. These figures relate to proposed developments and forecast traffic activity rather than measured operating volumes. Nevertheless, they establish the substantial additional freight task associated with individual poultry farms. When considered alongside the potential development of approximately 300 additional sheds across the region, the cumulative implications for agricultural freight movements, road infrastructure and heavy vehicle access are significant.

This provides a picture of the cumulative impact of increasing heavy vehicle and freight movements in the greater Tamworth area. This includes interactions with OSOM movements across the network. The key planning and infrastructure design consideration is not about a particular route being able to accommodate certain vehicle combinations. It is about the entire freight journey, including farm/facility access and local roads, intersections, bridges and connections and those being facilitated safely and efficiently by new infrastructure investment.

Existing access restrictions demonstrate the infrastructure challenge

Significantly, the Bective South planning documentation identifies a specific heavy vehicle access constraint. While the Oxley Highway is identified as permitting 25/26-metre B-doubles, the proposed farm's primary access via Soldiers Settlement Road was not identified as an approved B-double route at the time of the environmental assessment. The assessment therefore stated that an access approval would be required before B-double vehicles could use that route.

This is an example of the *last-mile access problem* affecting regional agricultural supply chains. Even where a major highway can accommodate modern heavy vehicles, a relatively short section of connecting local road can prevent or complicate their use.

The type of modern combinations being used to facilitate and enable agricultural supplies chains is changing. Infrastructure investment should therefore consider the combinations currently in use under condition and access constraints. This will future proof the network and prepare for future combinations to facilitate better, safer and higher productivity access.

[6] PSA Consulting (2024), *Silverweir Poultry Farm - Traffic Impact Assessment*, 13 June 2024. Particularly pp. 8 and 22.

Further evidence of the infrastructure challenge is demonstrated by Tamworth Regional Council's restrictions on Wallamore Road between Goddard Lane and Bowlers Lane. The Council identifies axle load limits of six tonnes for single axles, nine tonnes for dual axles and 13.5 tonnes for tri-axles on this section. It also identifies a single-lane culvert with a 40 km/h speed restriction[7].

These restrictions illustrate the structural and geometric limitations that can affect freight access within a major agricultural production region. This example is illustrative of the need to ensure new investments designed to cater for infrequent OSOM movements, enable greater first/last mile general freight movements, in addition to building network resilience.

Implications for regional freight productivity

There is a significant risk that the economic benefits of major agricultural investment will be undermined if the surrounding road network is not upgraded and approved to accommodate the higher-productivity vehicles necessary to service that investment efficiently.

LBRCA considers that infrastructure planning must anticipate the operational requirements of modern agricultural supply chains, rather than relying on incremental upgrades after freight demand has already increased.

This includes providing for 26-metre B-doubles and, where justified by freight demand and supported by appropriate engineering and safety assessments, longer Performance Based Standards (PBS) and A-double combinations.



Image 1: *30m Tri-Quad B-Double moving live poultry. Image supplied by Multiquip Pty Ltd.*

[7] Tamworth Regional Council, *Roads in the Region - Load Limits and Road Restrictions*.

The potential productivity benefits include increased payloads, fewer vehicle movements per tonne transported, reduced freight costs, improved vehicle and driver utilisation, and greater supply-chain resilience.

While the Tamworth poultry expansion is located outside the Newcastle–Dubbo corridor itself, it provides a compelling contemporary example of the broader infrastructure challenge confronting regional NSW.

The Golden Highway upgrade program must avoid the same potential disconnect between major investment in regional production and the availability of modern, connected heavy vehicle infrastructure.

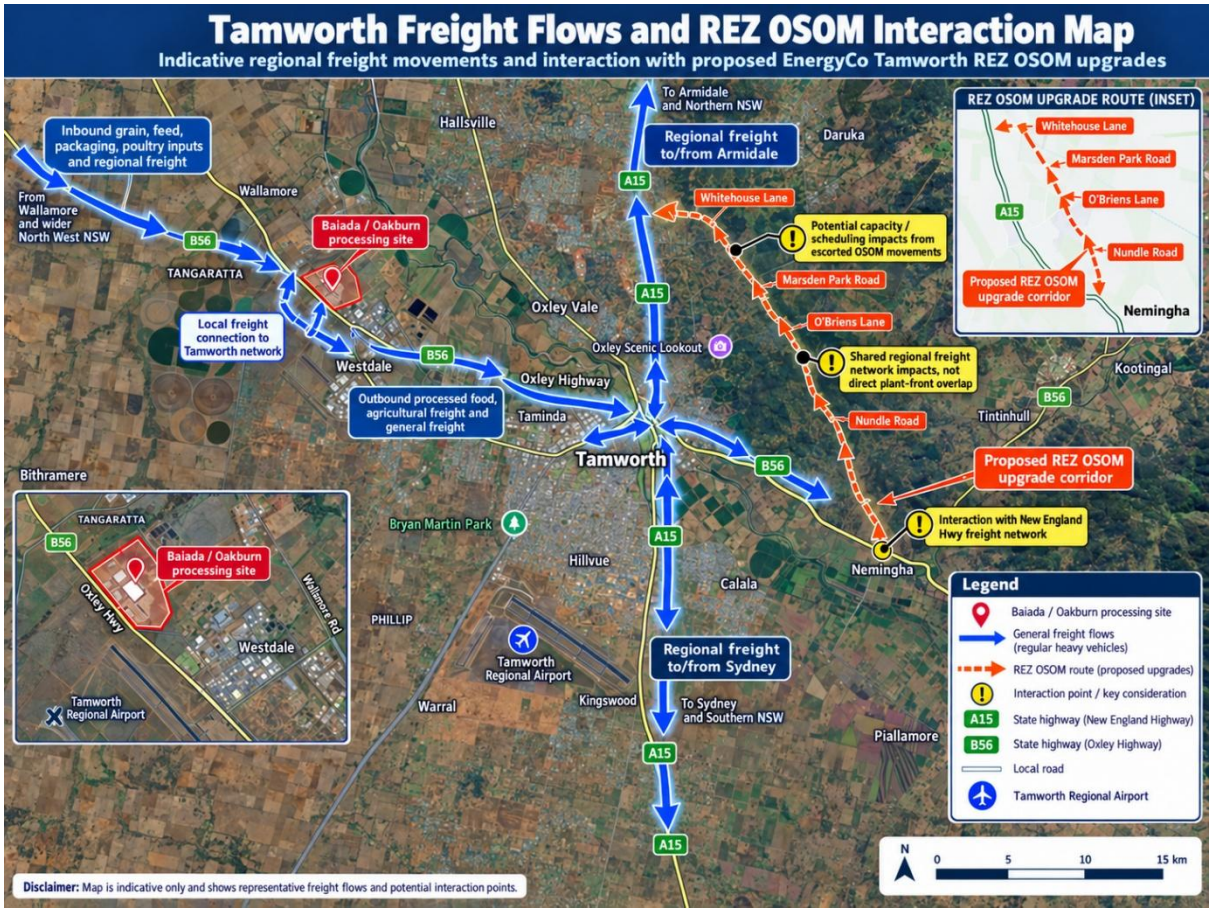


Image 2 *- This image is intended to provide a depiction of freight flows related to Baiada, interactions with the broader network, proposed upgrades and OSOM REZ loads. It was produced using Artificial Intelligence.*

Protect freight movements during construction and OSOM operations

The construction and operation of the proposed route may require temporary road closures, traffic controls, reduced operating speeds and coordinated OSOM convoys. These arrangements can have significant consequences for regional freight and communities.

Livestock transport movements are frequently constrained by animal welfare requirements, loading arrangements, processing schedules and fatigue-management obligations.-The

extent of disruption should therefore be verified through project-specific traffic management planning rather than presumed to be negligible. Alternative routes must be checked for the mass, dimensions and access approvals of the affected freight combinations.

Agricultural freight is also subject to seasonal demand, with concentrated periods of activity associated with harvest and other production cycles. This issue is raised in the context of broader OSOM movements, where there has been an ongoing impact on the freight network, with rural carriers being stuck in OSOM convoys. Extended delays or diversions can increase transport costs, affect delivery schedules and create additional compliance pressures.

LBRCA-recommends that EnergyCo, Transport for NSW and NHVR establish a framework that could provide for:

Transport for NSW is preparing a Corridor Capacity Plan to coordinate OSOM movements across the wider network, including freight impacts, curfews, emergency access, pullover bays and marshalling areas. LBRCA requests direct engagement with rural operators when the plan and the detailed Transport Management Plans for higher-risk loads are prepared (EnergyCo 2026, pp. 30–31).

- Advance notification of planned OSOM movements and road restrictions
- Coordination with major livestock and agricultural freight movements (i.e. in peaks)
- Clear communication channels for operators and dispatchers
- Suitable alternative routes where closures are necessary.
- Accelerate permit approvals for freight movements impacted by OSOM arrangements
- Clear procedures for responding to unplanned delays or operational conflicts.

Importantly, the availability of an alternative road should not be assumed to mean that it is approved or suitable for all heavy vehicle configurations or permanent access provided.

Flood resilience also draws out the need for whole-of-network operational planning. EnergyCo's desktop assessment identifies the common O'Brien's Lane/Nundle Road crossing of Goonoo Goonoo Creek as the most substantial flood constraint, with approximately 1,806 metres of affected road in the 1% annual exceedance probability event, including 1,771 metres classed as higher hazard. Contingencies should identify heavy vehicle approved routes rather than simply assume local road detours are suitable (EnergyCo 2026, pp. 24–25). This is particularly acute in the event that an OSOM load is mid-transit and subject to a flooding event that could hinder safe access.

Deliver lasting freight productivity benefits

The Tamworth OSOM route represents a substantial opportunity to improve regional infrastructure. LBRCA considers that its success should be measured by the enduring benefits delivered to regional communities and industries.

The possible road sealing, alongside targeted pavement and intersection upgrades, may provide opportunities to improve road safety, network resilience and freight efficiency, relating to:

- Retention or improvement of approved heavy vehicle access
- Improved intersection safety and operational efficiency
- Reduced infrastructure constraints
- Improved road surface and pavement resilience
- Opportunities for higher-productivity vehicle access
- Reduced disruption to local communities and established freight activities

The project should also clarify future road ownership, maintenance responsibilities and funding arrangements, particularly because Tamworth Regional Council is already responsible for maintaining much of the affected corridor (EnergyCo 2026, pp. 27, 30).

EnergyCo anticipates that additional Port to REZ OSOM traffic will increase maintenance frequency, while a suitable funding arrangement for the resulting costs is still to be developed with Council (EnergyCo 2026, p. 27). LBRCA recommends recording pavement condition before works and OSOM deliveries, monitoring deterioration during the program, and reaching a funded agreement covering additional maintenance and any necessary rehabilitation. Costs attributable to exceptional project movements should not be shifted to local ratepayers via councils, or existing regional freight users.

Alignment with Tamworth's broader freight network

EnergyCo has acknowledged Tamworth Regional Council's longer-term freight planning, including the proposed connection between South Tamworth and Nemingha associated with Burgmanns Lane.

EnergyCo identifies the proposed Southern Access Route as an investigation stage project without confirmed route alignment or committed funding. Its comparison estimates that the arterial-standard Burgmanns Lane option would cost approximately four times the Whitehouse Lane option, and a lower-specification Burgmanns option approximately twice as much (EnergyCo 2026, pp. 26, 28). LBRCA is not proposing that the OSOM project be delayed to deliver this separate road, but asks that current decisions preserve future freight network options and avoid duplicative works.

It is important that the selected OSOM route complements, rather than undermines, broader freight network planning. EnergyCo, Transport for NSW and Tamworth Regional Council should also identify whether the selected route creates opportunities for complementary investment or avoids the need for duplicative future works.

Conclusion

LBRCA supports infrastructure investment that facilitates renewable energy development and improves the capacity of Australia's transport networks and welcomes the opportunity to comment on the proposed works. Heavy vehicle access arrangements can be complex and

burdensome. Investment that improves access for one freight task should not diminish access for another.

The transport of livestock, grain and other agricultural commodities is an ongoing economic activity, and the associated infrastructure must remain safe, accessible and productive long after the construction of renewable energy projects is complete.

This submission relies on the EnergyCo reports available at:

- Tamworth Port to REZ OSOM route – development report
- Appendix A – OSOM report
- Appendix B – Supplementary review
- Appendix C – Road sealing memo
- Appendix D – Comparative noise assessment