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22 December 2025

Hay Shire Council Submission

Romani Battery Energy Storage System (BESS) – Environmental Impact Statement

SSD Application: SDD-67105475

Proponent: Romani Energy Pty Ltd

1. Introduction

Hay Shire Council (HSC) appreciates the opportunity to comment on the Environmental Impact Statement (EIS) for the proposed Romani Battery Energy Storage System (BESS). Council is supportive of renewable energy developments contingent on projects avoiding or mitigating impacts on local infrastructure, services and communities; and delivering community benefits where impacts are experienced.

Council's comments focus on consultation, transport, accommodation, cumulative impacts, water, waste, emergency management, economic impacts and decommissioning. Council has developed both a Community Benefit Framework and Renewable Energy Position Statements that should be considered in the finalisation of any project approval. The Hay Shire Council Renewable Energy Position Statements provide a consistent position on areas of impact and/or importance to the community of Hay Shire Council. The Position Statements set consistent expectations for project proponents, Community and Council throughout the lifecycle of major projects from planning, construction, operation, decommissioning, monitoring and reporting phases.

2. Consultation and Accuracy of Information

2.1 Council concerns

Hay Shire Council have identified gaps and inconsistencies in the EIS regarding consultation, including:

- Limited evidence of meaningful consultation with Councils during preparation of the EIS and technical studies and consultation
- Suggested consultation with Hay Shire Council staff that do not exist.
- Errors and assumptions within the documentation that are not supported by consultation outcomes; and
- Insufficient explanation of how Council feedback has influenced project design and mitigation measures.

2.2 Council position

Council requests that the Department require the proponent to provide:

- Additional evidence of consultation with affected Councils and communities; and
- Clarification and correction of identified errors and assumptions prior to determination.

3. Transport, Road Infrastructure and Traffic Movements

3.1 EIS position

The EIS estimates peak construction traffic of up to 56 heavy vehicle movements per day and assumes impacts on local roads will be minimal and that the current road network can accommodate the project.

3.2 Council concerns

Council does not agree with this conclusion. Key issues include:

- It would appear that the TIA has not been delivered in consultation with Local Road Authorities
- TIA does not identify any other local roads other than Boooroban – Tchelery as servicing the project. Council believes Romani, Glenhope and Maude Roads are most likely to be used by contractors, particularly given the planned usage of Boooroban – Tchelery Road by other energy projects. Council requests that these roads are considered in the TIA. The TIA should identify the likely impacts for raw materials deliveries and construction workforce movements.
- Local roads within Hay Shire are designed primarily for low traffic volumes and agricultural plant, not sustained heavy construction traffic. There will be a requirement for upgrades on local roads. All upgrades are required to be Austroads Design Guide and council engineer satisfaction. Council requests detailed Transport Management Strategy to be developed in consultation/agreement with all Local Road Authorities, in conjunction with the proposed Transport Management Plan.

3.3 CTMP and Transport Strategy

While the EIS references preparation of a Construction Traffic Management Plan (CTMP) and Road Maintenance Strategy, it provides limited detail on how these will be developed or enforced.

Council considers it essential that:

- Councils are directly involved in co-developing the Transport Management Strategy, CTMP and Road Maintenance Strategy in conjunction with Transport for NSW;
- All impacted roads, cattle grids and drainage infrastructure are assessed and upgraded prior to construction to Austroads Design Guide and council engineer satisfaction; and
- Binding commitments are secured for ongoing maintenance and post-construction restoration.
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4. Workforce Accommodation

4.1 EIS position

The EIS acknowledges limited housing availability and proposes reliance on existing accommodation in Hay, Deniliquin and surrounding towns.

4.2 Council concerns

Council considers the accommodation response inadequate:

- Both Hay Shire and Edward River LGAs face severe housing shortages.
- The EIS does not commit to a dedicated workforce accommodation solution.
- Tourism accommodation should not be used as a solution for workforce accommodation
- The cumulative impact of multiple REZ-related projects on housing supply is not adequately assessed.

Hay Shire Council notes that the anticipated influx of contractors, executives and FIFO workers will place significant additional pressure on already constrained housing markets, requiring a detailed and regionally coordinated accommodation strategy acknowledging the cumulative impacts of other energy developments (both large and mid scale) noting that the available short term accommodation is already exhausted .

4.3 Council position

A comprehensive Accommodation Strategy must be required that:

- Addresses cumulative workforce demand across concurrent projects;
- Avoids displacement of local residents and tourism accommodation;
- Identifies clear accommodation solutions, servicing arrangements and transport routes.

5. Cumulative Impacts

5.1 Council concerns

Council considers cumulative impacts to be insufficiently addressed, particularly in relation to:

- Transport and road infrastructure;
- Workforce accommodation;
- Water supply and wastewater disposal;
- Waste management capacity;
- Emergency services and health response;
- Telecommunications

The EIS acknowledges cumulative impacts in principle but does not provide a detailed assessment or enforceable and meaningful mitigation measures.

5.2 Council position

Council requests that cumulative impacts be reassessed and mitigated through enforceable conditions that recognise Hay's identified role as a service and workforce hub for multiple energy projects, including this project.

6. Water and Wastewater

6.1 Council concerns

While the EIS quantifies water demand (8.3 – 8.7ML per annum), it does not clearly:

- Identify alternative water supply
- Demonstrate how potable water use will be strictly limited;
- identify wastewater disposal arrangements where Council infrastructure may be relied upon.

Council is willing to provide water supply and wastewater disposal for the project. Council will require a Water as well as a Wastewater Agreement to ensure no unplanned burden will be placed on local infrastructure

7. Waste Management

7.1 Council concerns

Hay Shire Council is willing to enter into a waste management agreement for all waste streams.

7.2 Council position

Council requires that the project:

- Prepare a comprehensive Waste Management Plan (WMP) approved prior to construction;
 - The WMP must address all waste streams from construction, operation and any accommodation facilities;
 - Noting the use of Council waste facilities must be governed by the Waste Management Agreement and capacity confirmation.

8. Emergency Management and Bushfire Risk

8.1 Council concerns

- Bushfire risks are addressed only at a high level in the EIS;
- The site is located on bushfire-prone land with limited nearby emergency response capacity;
- Travel distances and availability of trained personnel may significantly delay response times.

8.2 Council position

Council requests that a site-specific Emergency Management Plan be required, detailing:

- On-site first-response firefighting equipment;

- Trained personnel available during construction and operation;
- Fire suppression and containment measures;
- Consultation and coordination with local LEMC (Both ERC and HSC)

9. Economic Impacts and Community Benefits

9.1 Council concerns

The EIS proposes a community benefit mechanism primarily through a Planning Agreement with Edward River Council, despite:

- A significant proportion of traffic, workforce movements and service demand affecting Hay Shire.

This approach is inconsistent with the NSW DPHI Community Benefit Framework (2024) and Hay Shire Council's Community Benefit Framework (2025) , which seeks equitable benefit sharing aligned to impact distribution.

EIS proposes that 30% of workforce will be supplied locally. These numbers are inconsistent with current available workforce within Hay LGA.

9.2 Council position

Council seeks:

- Inclusion in benefit-sharing arrangements through a Planning Agreement with Hay Shire Council;
- Community benefit contributions proportionate to impacts experienced by Hay Shire, noting that the project identifies Hay LGA as location for 30% of workforce, accommodation and transport impacts (50% of traffic movements).
- A detailed workforce development plan including commitment to engage with local supply chain contractors.

10. Decommissioning and Rehabilitation

10.1 Council concerns

There is limited information in the EIS regarding decommissioning and rehabilitation, including:

- How the site will be rehabilitated to pre-construction condition or agreed future use;
- Management of hazardous materials and waste;
- Monitoring, reporting and final closure certification arrangements;
- Financial responsibility for decommissioning and rehabilitation.

10.2 Council position

A detailed Site-Specific Decommissioning and Rehabilitation Plan must be required, confirming that:



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- All costs are borne by the Proponent;
- Council and DPHI (or other relevant State Govt Agency) provide final approval arrangements;
- No financial burden is placed on Councils or the community.

11. Conclusion

Hay Shire Council requests that DPHI:

1. Require further information to address the deficiencies identified in this submission;
2. Impose conditions of consent that:
 - Protect and maintain local infrastructure and services at a minimum;
 - Require formal agreements where Council assets or services are impacted or utilised;
 - Address cumulative impacts across the SW Renewable Energy Zone; and
 - Secure fair and proportionate community benefits for Hay Shire.
 - Minimise any impacts to the local community and the region.

For further information please contact
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