

22 December 2025

Your ref: SSD-69799460

Our ref: ARC24/9267

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Dear Rita

Council advice on Tilbuster 2 Solar Farm (SSD-69799460) response to submissions

I refer to DPHI's request for advice on the Tilbuster 2 Solar Farm (SSD-69799460) and thank the Department for providing Council with the opportunity to review the response to submissions. Following its review, Council would like to provide the following advice.

Net community benefit and Community Benefit Framework

Page 27 of the Response to Submissions Report notes that "EP Sunspot 5 has begun liaising with ARC on the VPA for Tilbuster 2 Solar Farm." While this is accurate, no general terms have been agreed. Council requests that DPHI's determination of this development application be deferred until those terms are settled.

Water

EnergyCo's *Water & Wastewater Security Study* for the New England Renewable Energy Zone (NE REZ) clearly demonstrates that the level of water demand generated by concurrent renewable energy developments will be unsustainable and far exceeds the capacity of existing regional systems. To illustrate the scale of projected impacts, the study indicates that REZ developments in the Armidale Region LGA alone would require 85-176% of Armidale Regional Council's (ARC) current secure supply for at least five years. Further, across Armidale, Walcha and Uralla, the additional water demand from renewable energy development could be 46 ML/day, equivalent to 700% of ARC's current secure supply. Even if the water existed to supply this additional demand, the total combined capacity of the Armidale, Uralla, and Walcha water treatment facilities is only 32 ML/day.

Given this context, Council remains concerned that the project proposes to rely on commercial water suppliers who would draw on Council-managed water resources. Council notes that the correspondence in Appendix D confirms the nominated suppliers intend to source water from Council's supply. In the absence of a coordinated, REZ-wide water strategy, supported by dedicated infrastructure investment and clear governance arrangements, Council cannot responsibly support any proposal that relies on Council water supplies for construction. Likewise, it would be reckless for DPHI to approve any renewable energy development without conditions that explicitly prohibit the use of Council water resources.

Waste

Council considers that the proposed waste management approach is acceptable in principle, noting that it does not rely on Council-managed landfill facilities. Council requests that this be reflected in the conditions of any consent.

Temporary worker accommodation

Council considers the proposed temporary worker accommodation approach to be acceptable in principle. However, Council requests that a comprehensive Workforce Accommodation and Employment Strategy be submitted as an amendment to the EIS, not post-approval. Deferring this to a later stage provides insufficient lead in time to manage impacts effectively and will potentially impact on the timing and ability of the project to commence as it is leaving this critical matter to a later stage where there will be the likelihood that many other projects within the region will also be competing for the same scarce resources.

Health services

Page 38 of the SIA states that the proponent will "ensure that the construction contractor provides on-site medical services (such as telehealth) for nonresident workers." Council requests that this be reflected in the conditions of any consent.

Please contact me by email at swood@armidale.nsw.gov.au if I can be of further assistance.

Yours sincerely

Stephen Wood
Senior Strategic Planner