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Our ref: ARC24/6678

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Dear Miranda

Council advice on Gara BESS (SSD-71680710) Environmental Impact Statement

I refer to DPHI's notification of the EIS for the Gara BESS (SSD-71680710) and thank the Department for providing Council with the opportunity to review the EIS. Following its review, Council would like to provide the following advice.

Water

Council advises that it currently has limited capacity to supply potable or construction water for this project, and no capacity during periods of drought. If the proponent intends to access any ARC Council water sources, either directly or via third parties, this must be formally negotiated and agreed with Council in advance.

Solid waste

Council continues to raise significant concerns regarding the cumulative waste impacts of renewable energy developments within the ARC LGA and neighbouring LGAs. With a growing number of projects proposed, the minimisation of waste and maximisation of recycling are critical to avoid placing undue pressure on Council's landfill facilities.

Section 6.15 of the EIS indicates that a Waste Management Plan for all phases of the project will be prepared in due course. Any development consent must require the preparation of these plans to the satisfaction of Council, and they must be submitted and approved prior to the commencement of any construction works. Council advises that these plans should not include Armidale Regional Landfill – the latter cannot accept waste from REZ projects if it is to comply with the conditions of its Environmental Protection Licenses, except for:

- Certified virgin excavated natural material (VENM); and
- Paper and cardboard and comingled recycling.

Transport

Council acknowledges that the proposed intersection upgrade will be subject to a Works Authority Deed process with Transport for NSW (TfNSW). However, it is strongly recommend that the proposed site access be modified to square the intersection to 90 degrees. This adjustment is considered necessary due to the nature and frequency of heavy and OSOM vehicle movements anticipated during construction.

Of particular concern is the available sight distance at the proposed access point along Waterfall Way. The TIA indicates that the sight distance for eastbound drivers (approaching from Armidale) is approximately 230 m, which is below the minimum 250 m Safe Intersection Sight Distance recommended under Austroads for a 100 km/h speed zone. While the westbound sight distance is slightly better (260 m), it is still only marginally compliant.

Given these constraints, and the known risks associated with large vehicle turning movements, Council considers that design measures to further mitigate safety risks are warranted. A squared intersection would improve visibility and turning geometry and reduce potential conflict with through traffic.

Social impact assessment

Council acknowledges that the proponent has, to date, engaged constructively with Council concerning ways of mitigating social impacts, and has taken a proactive approach in developing the terms of a VPA. However, the SIA's appraisal of cumulative socio-economic impacts is fairly perfunctory, and proposed mitigation strategies are tokenistic and vague. Cumulative impacts from overlapping renewable energy developments in the Armidale region present a significant and underappreciated risk. While individual projects may appear manageable in isolation, their combined effects on housing availability, health services, and workforce supply (to say nothing of road networks, landfill, water and waste services, and the environment) can be substantial and compounding. The SIA for this project must assess these region-wide pressures comprehensively and propose concrete strategies to mitigate them. Regional infrastructure and community wellbeing will be under unsustainable strain without a coordinated and transparent cumulative impact assessment process.

Council requests that the proponent and/or the NSW Government provide clear responses to the following two questions within the EIS:

- What are the cumulative socio-economic costs, and who bears them?
- What are the cumulative socio-economic benefits, and who reaps them?

Council seeks assurance that the Armidale regional community does not disproportionately bear the costs of energy transition infrastructure while the benefits flow elsewhere.

As part of a revised assessment of cumulative impacts, Council suggests a broader (and more up-to-date) review of major projects within the vicinity of the proposal. Given Armidale's central location within the REZ and its status as the most populous centre within a one-hour commute radius, the town is expected to face significant

pressure on its already limited accommodation and local services. Anecdotal evidence indicates that many smaller towns within and around the New England REZ also have tight rental markets, with little available capacity to absorb the anticipated influx of construction workers required for multiple concurrent projects.

Workforce accommodation and employment strategy

Council notes the forecast peak construction workforce of 80 full-time equivalent (FTE) workers, with the peak likely to coincide with the construction phases of other large renewable projects. Council also notes the sketchiness of the Accommodation Analysis (Appendix W). Given this, 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.

This Strategy must address the following:

Workforce sourcing and socio-economic impact

- Due to the Armidale Region's low unemployment rate, the Strategy must identify where the workforce will be sourced.
- The Strategy must include definitive commitments regarding:
 - A local participation plan, including an Aboriginal participation plan, which seeks to invest in and develop local skills and employment opportunities, particularly within disadvantaged groups such as the Ezidi community;
 - The proportion of the construction workforce that will be recruited locally;
 - The number of traineeships and apprenticeships made available to local residents;
 - Assessment of job competition impacts on local businesses, and measures to mitigate these impacts;
 - Actions to deliver tangible and lasting social and economic benefits across the LGA.
 - Quantified predictions of local spending by non-local workers.

Accommodation Requirements

- Council strongly opposes the use of tourist and visitor accommodation for the construction workforce, as this infrastructure is critical to the region's visitor economy. Publicly available accommodation is already limited; access to it must remain prioritised for tourists, service providers, and existing community needs.

- Similarly, Armidale's private rental market must not form part of the accommodation solution due to affordability pressures.
- Council's current preference is that temporary workers be housed in the University of New England's (UNE) colleges (UNE has advised that its colleges have spare capacity). In this context, Council acknowledges that the proponent has been proactive in pursuing this option.

Cumulative Impacts and Regional Coordination

- The proponent must consider the timing and status of all other major projects within the NEREZ to avoid cumulative pressures on local accommodation, infrastructure, and services.
- Coordination with other proponents should be considered to identify regional accommodation solutions and avoid duplication.
- Drive-in-drive-out (DIDO) and fly-in-fly-out (FIFO) arrangements should be assessed, including expected numbers, traffic safety, and impacts on road infrastructure;
- Impacts on health, emergency, and community services should be considered.

A coordinated approach from the State Government

It should not fall to individual councils or proponents to resolve region-wide challenges that are clearly structural and interlinked. The impacts of concurrent development - including dilapidation of roads, workforce shortages, housing displacement, and community fatigue - are not within the control or remit of a single proponent, nor can they be effectively mitigated through bilateral agreements alone. A formalised regional impact framework, coordinated by EnergyCo, in line with its statutory obligations, is urgently required to manage cumulative impacts across the New England REZ. Without this, regional communities will continue to shoulder disproportionate burdens while broader energy transition goals are pursued.

The scale and pace of development within the New England REZ demands more than isolated, project-by-project assessment; it requires coordinated oversight. Armidale Regional Council urges the State Government to explain how it intends to take an active leadership role in orchestrating the rollout of concurrent renewable energy developments. Without a centralised coordination framework, cumulative impacts will remain poorly managed, placing undue pressure on regional communities. The State Government must ensure that agencies, proponents, and local councils are aligned through regional planning mechanisms, shared data platforms, and clear governance arrangements to avoid repeating the planning failures observed in other REZs.

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