

5 October 2025

Your ref: SSD-94769463

Our ref: ARC25/9843

Rita Hatem
4 Parramatta Square
12 Darcy Street
Parramatta, NSW, 2150
Locked Bag 5022, Parramatta NSW 2124
E: rita.hatem@dpie.nsw.gov.au

Dear Rita

Request for advice on Holloway Battery Energy Storage System (BESS) – SSD-94769463

I refer to DPHI's notification of the Draft SEARs for the Holloway BESS, SSD-94769463, and thank the Department for providing Council with the opportunity to review the scoping report for the proposed development.

Following its review, Council would like to provide the following comments in response to the proposal and Draft SEARs, which should be taken into consideration during the preparation and finalisation of the EIS.

General

The Armidale Regional Local Government Area (LGA) is located within the New England Renewable Energy Zone (NEREZ), one of five designated Renewable Energy Zones (REZs) in the state, recognised for its capacity and suitability to accommodate large-scale renewable energy developments. This strategic role is acknowledged in key planning documents, including the *New England North West Regional Plan 2041*, the *Armidale Community Strategic Plan 2022–2032*, and the *Local Strategic Planning Statement 2024*.

While the community has generally expressed support for renewable energy technologies, strong concerns have emerged regarding the cumulative impacts and absence of State-level coordination associated with the growing number of large-scale renewable energy projects that have been approved or are currently under assessment within the LGA and neighbouring LGAs.

Issues the NSW State Government must address

Cumulative impacts

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, workforce supply, road networks, landfill, water and waste services, and the environment can be substantial and compounding. The EIS for this project must assess its contributions to 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 NSW Government provide clear responses to the following two questions as part of the EIS process:

- What are the cumulative environmental, social, and economic costs of renewable energy developments within the Armidale Regional Council (ARC) LGA - and who bears them?
- What are the cumulative environmental, social, and 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.

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 NEREZ. 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 NEREZ demands more than isolated, project-by-project assessment; it requires coordinated oversight. Armidale Regional Council urges the State Government to explain how EnergyCo will 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 clear planning failures observed in other REZs.

Issues the proponent must address

Net community benefit and Community Benefit Framework

The NEREZ must produce a substantial net community benefit for the Armidale Region. To that end, ARC has adopted a Renewable Energy Community Benefit Framework (Framework) to promote benefit-sharing strategies associated with the development of state-significant and regionally significant renewable energy projects in the ARC LGA that:

- Secure off-site benefits for the community so that renewable energy development delivers a future sustainable net community benefit;
- Ensure that the wider community share in the benefits resulting from renewable energy development in the LGA;
- Ensure that the costs and benefits of renewable energy development will be equitably distributed within the community and inter-generationally;
- Ensure that community benefit outcomes are determined through appropriate governance processes which include REZ community representation.

The financial value of community benefit will vary from project to project, however, the minimum community benefit threshold for ARC is:

- \$850 per megawatt per annum for solar energy development for the life of the development (including future modified or recommissioned projects).
- \$1050 per megawatt per annum for wind energy development for the life of the development (including future modified or recommissioned projects).
- \$850 per megawatt of capacity for energy storage developments (including pumped hydro).

Note: Amounts above are in 2023 dollars and will be adjusted annually for CPI.

Projects that do not deliver community benefits above these thresholds are likely to be considered not in the public interest.

Council requests that the proponent contact Council's Chief Officer, Planning and Activation, Daniel Boyce, at dboyce@armidale.nsw.gov.au, to initiate negotiations for a Planning Agreement

Water

Council requests that the EIS clearly identify the proposed source of construction water, along with the total volumes required for all construction phases.

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 raises significant concerns regarding the cumulative waste impacts of renewable energy developments within the Armidale Regional Council (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.

Council strongly recommends that the proponent be required to prepare a comprehensive Waste Management and Decommissioning Plan as part of the EIS. This plan must:

- Identify, quantify, and classify all expected waste streams during construction, operation, and decommissioning;
- Outline measures for waste avoidance, reuse, recycling, and safe disposal;
- Provide details on the expected lifespan of high-volume waste materials and identify resource recovery opportunities; and
- Acknowledge any current limitations in recycling infrastructure and outline steps being taken, such as research, trials, or partnerships, to support innovation in resource recovery.

Council advises that the Armidale Regional Landfill 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.

Workforce and accommodation

Council notes the forecast peak construction workforce of 80 full-time equivalent (FTE) workers, and that construction for this proposal is likely to coincide with construction phases of other large renewable projects. Given this, Council requests that a comprehensive Workforce Accommodation and Employment Strategy be submitted as part of the Environmental Impact Statement (EIS), not post-approval. Deferring this to a later stage provides insufficient lead time to manage impacts effectively and will potentially impact 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 First Nations and Yezidi communities;

- 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 preference is that temporary worker accommodation be aligned with Council's broader Housing Strategy and regional development goals, with options including:
 - Use of the University of New England's (UNE) colleges (UNE has advised that its colleges have spare capacity).
 - Legacy housing opportunities, such as medium-density housing on sites like the Marsh Street car yards.
 - Trunk infrastructure investment to unlock greenfield housing supply.
 - Dedicated workers' camps on Council-owned land, established near existing urban areas or villages.

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.

Health services

Council draws the proponent's attention to the Cumulative Impact Assessment Report prepared by Mid-Western Regional Council (MWRC) in early 2024, available at: www.midwestern.nsw.gov.au/files/assets/public/v/1-development/mwrc-managing-the-impacts-of-ssd-final-v.01.pdf

The report identifies a range of significant cumulative impacts projected for the Mid-Western LGA alone, including:

- Ambulance Services: A requirement for up to 30 additional paramedics, with a median need for four ongoing.
- General Practitioners (GPs): Up to eight additional GPs needed during peak construction.
- Hospital Beds and ED Staffing: An additional eight emergency department bays, seven nurses, and over 5,000 additional ED presentations in a single year (2026).

Assuming a comparable (or even greater) impact scenario for the Armidale region, Council expects the proponent to outline how similar service demands will be addressed in this locality. Specifically, Council requests clarification as to:

- Whether the proponent intends to directly support the provision of additional health services; and
- If not, which agencies or entities are expected to bear this responsibility?

Council advises the proponent that temporary workers are unlikely to access general practitioner (GP) services in the Armidale Region, as most local practices are currently not accepting new patients.

Landscape and visual impact

If the EIS proposes vegetation screening, Council requests that:

- Landscape buffering be installed early in the construction phase;
- Plant species be consistent with the local vegetation community; and
- Visual mitigation measures be monitored and maintained for the life of the project.

Traffic and transport

Council requires the submission of a Traffic Impact Assessment (TIA) that addresses both construction and operational phases of the project. The TIA must include:

- An assessment of existing and proposed access routes, including their capacity to accommodate construction and operational traffic loads.

- Identification of access routes through and around Armidale, and any necessary upgrades to local or state road infrastructure, to be completed to the satisfaction of the relevant road authorities (Council and/or Transport for NSW).
- Confirmation that any upgrades to public infrastructure are the responsibility of the developer until the end of the construction period. At that time, Council will inspect and assess the condition of these assets before accepting any handover.

The developer must also submit pre- and post-construction dilapidation reports for all affected public infrastructure. The initial report is to be completed after any road upgrades are finalised, with a follow-up report required once construction is concluded. Any damage or defects identified must be rectified by the developer prior to Council assuming responsibility for the upgraded infrastructure.

The TIA must also identify whether transport of over-dimension vehicles will require the removal and reinstatement of roundabout medians, centre islands, signage, or street furniture. Strong controls must be in place to ensure all such infrastructure is fully reinstated to its original condition and to Council's satisfaction.

Council further notes that:

- Some access roads may be inadequate for transporting large equipment or materials and may require widening, upgrades, or structural assessment of bridges and creek crossings for over-mass loads. Early engagement with Council and TfNSW is essential in this regard.
- If the proposed route includes the railway overpass bridge at Kentucky/Dangar Streets, the developer is advised that this structure is owned by the rail authority and currently limited to one heavy vehicle at a time due to its deteriorated condition. The rail authority must provide pre- and post-construction certification of the bridge's structural integrity, confirming its capacity to accommodate proposed loads and that no further deterioration has occurred.

Stormwater management plan

A comprehensive stormwater management plan should be prepared to ensure that post-development stormwater flows do not exceed pre-development levels. The plan must include effective sediment and erosion control measures to be implemented during both the construction and operational phases of the development.

Sewage and wastewater management

If toilet facilities are required during the construction or operational phases, an On-Site Sewage and Wastewater Management (OSWWM) system must be installed. This system may also need to be decommissioned at the end of the operational period. A Section 68 Application is required for both the installation and operation of the OSWWM system.

Decommissioning and rehabilitation

Council requests that a detailed Decommissioning and Site Restoration Plan be prepared and assessed as part of the EIS, to ensure that the long-term impacts of the development are fully understood. Both Council and the community must have confidence that the site can be successfully returned to agricultural use upon cessation of the project.

The Plan must, at a minimum, include:

- A clear estimate of the present value cost of decommissioning works, with a detailed explanation of how this figure was calculated, including appropriate contingencies for inflation and market variability; and
- A physical decommissioning and land restoration plan, prepared or certified by a qualified engineer, confirming that the site can be fully remediated and restored to its pre-development land capability and suitability for primary production.

Koala protection

Council advises that the Project site is located between two designated koala corridors within ARC's *Koala Management Strategy*. To prevent harm to local fauna, particularly koalas, all security fencing proposed around the development site must incorporate wildlife-exclusion measures. Fencing should be designed to prevent koalas from climbing and becoming trapped, and no barbed wire is to be used, due to the risk of entanglement and injury to wildlife. These considerations must be fully addressed in the Biodiversity Development Assessment Report (BDAR).

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