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Your ref: SSI-74175972

Our ref: ARC24/9312

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Dear Rachel

Request for advice on New England REZ Transmission Project – SSI-74175972

I refer to DPHI's notification of the amended SEARs for the New England REZ Transmission Project, SSI-74175972, and thank the Department for providing Council with the opportunity to review the Revised Scoping Report for the proposed development.

Following its review, Council would like to provide the following comments in response to the proposal, 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 2025–2034, 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.

Cumulative impacts

Cumulative impacts from overlapping renewable energy developments in the Armidale region present a significant and underappreciated risk, as the Proponent's Major Regional Infrastructure Studies unequivocally demonstrate. 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 must assess the Project not only as a standalone item of State Significant Infrastructure, but in the context of concurrent and reasonably foreseeable renewable energy generation, storage and transmission projects within the NEREZ. The assessment must clearly identify impacts that will be borne by local government areas, including Armidale Regional Council (ARC), and demonstrate how those impacts will be avoided, minimised or mitigated through enforceable measures.

The EIS must include a comprehensive cumulative impact assessment that:

- a) identifies all approved, proposed and reasonably foreseeable renewable energy, storage and transmission projects within the NEREZ that may overlap spatially or temporally with the Project;
- b) assesses cumulative impacts on housing, workforce accommodation, water supply, wastewater services, waste management, local roads, emergency services, health services and community infrastructure; and
- c) presents cumulative impacts at an LGA scale, including specific analysis for the ARC area.

Regional infrastructure and community well-being will be under unsustainable strain without a coordinated and transparent cumulative impact assessment process.

Council requests that the Proponent provide clear responses to the following two questions as part of this EIS process:

- What are the cumulative environmental, social, and economic costs - 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 bear a disproportionate share of the costs of energy transition infrastructure while the benefits flow elsewhere.

Governance, coordination and staging

It should not fall to individual councils or private-sector 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 private-sector proponent, nor can they be effectively mitigated through bilateral agreements alone. A formalised regional impact framework, coordinated by the Proponent, 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. ARC 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.

To date, there appears to be some uncertainty regarding the manner in which the Proponent has interpreted and applied its statutory functions under the *Electricity Infrastructure Investment Act 2020*. Section 63(4) of this Act specifies the Proponent's functions as follows:

63 Infrastructure Planner

(4) Subject to limitations in the instrument of appointment, an infrastructure planner has the following functions—

(a) to make and enter into contracts or other agreements in connection with the exercise of its functions under this Act,

(b) to investigate, plan, co-ordinate and carry out planning and design of generation infrastructure,

(c) to investigate, plan, co-ordinate and carry out planning, design, construction and operation of storage and network infrastructure,

(d) other functions prescribed by the regulations,

(e) other functions conferred or imposed on the infrastructure planner by or under this or another Act or law.

The *Regulations* reinforce the functions highlighted above:

42D Functions of infrastructure planner—particular renewable energy zones—the Act, s 63(4)(d)

(1) This clause applies if—

(a) the Energy Corporation is appointed as the infrastructure planner for a renewable energy zone, and

(b) the Minister has declared, in accordance with the Act, section 24(1), the access scheme that applies in the renewable energy zone or part of the renewable energy zone.

(2) The infrastructure planner for a renewable energy zone to which an access scheme applies has the following functions—

(a) to coordinate the construction of generation, storage and network infrastructure in the renewable energy zone,

(b) if the declaration specifies that the scheme financial vehicle is, in relation to the access scheme, liable to pay the infrastructure planner the component of fees payable under the Act, section 26 to be held for use for a community purpose or an employment purpose—

(i) to administer, manage and make payments of money held for use for a community purpose or employment purpose, and

(ii) to make guidelines about the administration, management and payment of money under this clause.

In light of this, the EIS must clearly and explicitly address the Proponent's statutory role as Infrastructure Planner under the *Electricity Infrastructure Investment Act 2020*, including its functions relating to the coordination of generation, storage and network infrastructure within the NEREZ.

In particular, the EIS must:

1. Statutory role clarification

- a) clearly describe the Proponent's statutory coordination functions, including those relating to the coordination of construction, staging and sequencing of REZ infrastructure; and
- b) distinguish these statutory functions from roles performed by DPHI, other consent authorities, and individual proponents.

2. Demonstration of coordination in practice

- a) identify the specific mechanisms through which the Proponent has coordinated, or proposes to coordinate, the timing, staging and sequencing of generation, storage and network infrastructure in the NEREZ, in line with its statutory obligations;
- b) explain how coordination has occurred to date, including where coordination has not been achieved and the reasons for this; and
- c) demonstrate how the Proponent's coordination role will operate in a binding and operational manner during construction and commissioning, rather than solely through aspirational or strategic statements.

3. Cumulative impact management framework

- a) describe how the Proponent's coordination role will be used to manage cumulative impacts associated with overlapping REZ projects, including workforce accommodation, housing availability, water supply, wastewater services, waste management, traffic and local road impacts;
- b) identify how cumulative impact information will be shared between the Proponent, private-sector developers, State agencies and local government; and
- c) explain how identified cumulative risks will directly inform project design, staging, mitigation measures and consent conditions.

4. Accountability and decision-making

- a) identify which entity or entities are responsible for decision-making where cumulative impacts exceed local or regional capacity thresholds;
- b) explain how the Proponent's coordination role will be embedded in the statutory approval framework to avoid reliance on non-binding future studies or strategies; and
- c) demonstrate how coordination outcomes will be enforceable through conditions of consent or other statutory mechanisms.

5. Local government integration

- a) describe how local government input, including from ARC, will be incorporated into the Proponent's coordination and sequencing decisions;
- b) identify opportunities for councils to access forward-looking information on staging, workforce numbers and peak impact periods; and

c) outline how the Proponent's coordination role will reduce the risk of local government bearing unmanaged cumulative impacts.

6. Monitoring and reporting

- a) provide a framework for monitoring cumulative impacts over time;
- b) specify clear trigger points for additional mitigation or management action; and
- c) outline how regular reporting will be provided to ARC during construction.

7. Avoidance of coordination by deferral

The EIS must not rely on broad statements of "whole-of-government coordination" or future strategies to address cumulative impacts. Where coordination is claimed, the EIS must demonstrate how that coordination will be exercised in practice, by whom, and with what authority.

In short, Council requests that the SEARs require explicit examination of EnergyCo's statutory coordination role and its application in practice, to ensure that claims of regional coordination are matched by enforceable mechanisms capable of managing cumulative impacts at the local government level.

Water and wastewater security

Council requests that the EIS include a thoroughgoing water security and wastewater assessment that clearly identifies the proposed source of construction water, along with the total volumes required for all construction phases.

The Revised Scoping Report advises that:

Key resources required for the construction of the Project will include fill material, water, fuel, concrete, steel and electricity ... While Project construction would result in some increased demand on local and regional resources, it is unlikely that the Project alone would result in any of these resources becoming scarce or in short supply, with the potential exception of construction water (p. 158).

This might be regarded as an understatement. The Proponent's *New England Renewable Zone Water and Wastewater Security Study* clearly demonstrates that the level of water and wastewater demand generated by the Project and concurrent renewable energy developments will be unsustainable, and far exceeds the capacity of existing regional systems, with especially severe risks during drought. The Study finds that by 2031, additional potable and non-potable water demand associated with NEREZ development across Armidale, Uralla and Walcha could reach 16.8 GL/year (46 ML/day). This represents around seven times ARC's current secure supply and is equivalent to almost seven Olympic swimming pools of additional water per year. This is in a context where Armidale's water system is already under significant pressure: the Armidale Region requires 4.3 GL/year yet has access to only 2.4 GL/year of secure supply, equating to 56% of current needs. As a result, the Armidale Region has been assessed under the NSW Government's Safe and Secure Water Program as Category 5, the highest level of water security risk.

Even if sufficient water resources were available, treatment capacity is a binding constraint. The combined capacity of the Armidale, Guyra, Uralla and Walcha water treatment plants is approximately 32 ML/day, significantly below projected peak construction demand (i.e., 46 ML/day). The *Water and Wastewater Security Study* finds that under peak REZ conditions, ARC would have a water treatment capacity deficit of up to 199% for

seven years; Uralla would experience a deficit of up to 399%. At present, Armidale and Uralla water treatment plants are already at or beyond capacity during peak periods.

Wastewater infrastructure is similarly constrained. None of the sewage treatment plants servicing Armidale, Guyra, Uralla, Bundarra or Walcha has significant spare capacity. Even allowing for planned upgrades, the Study projects that Armidale's sewage treatment plant will operate at up to 99% capacity for extended periods during NEREZ construction, while neighbouring systems face exceedances during peak construction years.

In short, there is no credible pathway for meeting projected NEREZ water and wastewater demand using existing local water and wastewater infrastructure. Water and wastewater security are preconditions, not by-products, of renewable energy development in the NEREZ. As such, Council advises that it cannot commit to supplying water to the proposed project. Council's position is guided by its *Regional Water Security Strategy*, developed in partnership with the NSW Government, Public Works Advisory (PWA), and Department of Climate Change, Energy, the Environment and Water (DCCEEW). This strategy prioritises the long-term sustainability of local water resources and the needs of the community. In this context, it would be irresponsible for Council to divert potable or town-sourced water to REZ construction activities. Until a coordinated, REZ-wide water strategy is developed, supported by appropriate infrastructure investment and clear governance arrangements, Council is unable to support any renewable energy proposal that relies on its water supply for construction purposes.

Solid waste

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.

The Revised Scoping Report suggests that waste management issues for the Project "are expected to generate minimal or low impacts" (p. 163). Despite this, the Proponent's *New England Renewable Energy Zone Waste Management and Circular Economy Study* demonstrates that the additional waste generated by NEREZ infrastructure will be substantial. For Armidale, waste generated by the Project alone is expected to peak at approximately 5,000 tonnes per annum (tpa) in 2030–31, equivalent to around one-third of Council's existing landfill licence. When renewable energy developments are added to transmission works, the pressure on Armidale's landfill increases further. With a selected number of renewable energy developments included (10 projects within the ARC LGA), the Study indicates that NEREZ-related waste would consume more than two-thirds of ARC's licensed landfill capacity in 2027, and approximately 20-30% of that capacity, on average, across the period 2026–2033.

These findings are set against a waste management context across the NEREZ that is already highly constrained. ARC's landfill is licensed to accept 15,000 tpa, a limit that is currently met or exceeded. Uralla Shire's landfill has less than three years of remaining capacity and is already looking to neighbouring LGAs for assistance, while Walcha and Glen Innes Severn have no capacity to accept REZ-related waste. As such, Council advises that the

Armidale Regional Landfill cannot accept waste from this Project or 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

While Council notes the forecast peak construction workforce of 1,400 full-time equivalent (FTE) workers (p. 60), the absence of LGA-level disaggregation limits the assessment of local impacts. Council requests that the EIS specify workforce and accommodation demand by LGA.

Regardless, construction for this Project 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 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 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.
- Given that the Project is being funded by public money, Council expects that temporary workers will be housed in purpose-built, legacy accommodation that provides long-term benefit to the region.

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

Council requests that the visual and landscape assessment include a comprehensive photomontage of the development from all relevant viewpoints, prepared by a suitably qualified consultant. The full visual impact of the project cannot be properly assessed without such visualisation.

Council also requests that the visual and landscape assessment include photomontages showing cumulative visual impacts. These should include all approved and proposed projects in the area and be prepared by a qualified consultant. The cumulative visual impact of the Project, coupled to windfarm developments, amongst others, will significantly alter the rural landscape and must be fully understood and transparently assessed.

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 Proponent 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 Proponent 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.

Boorolong, Warrane and Romani Roads are Council-owned collector roads with the potential to be used as access roads for the Project. However, this will require road widening, intersection upgrades and possible bridge assessments. Council should be provided the opportunity to review and endorse the TIA, the concept designs and any Construction Traffic Management Plan before finalisation. Post-construction, Council requests that the proponent fund rehabilitation or reconstruction of affected roads to an agreed standard through a deed or Voluntary Planning Agreement.

Quarry materials and resource competition

Given the expected scale of road upgrades and associated civil works, the proponent must actively consult with Council regarding the source, quantity, and timing of gravel and rock extraction to ensure that material procurement does not adversely affect Council's operational supply chain or programmed maintenance activities.

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.

Biodiversity

The proposed development and its associated corridor need to have regard to [Council's Koala Management Strategy](#). Given the proximity of the development to potential/core koala habitat, any proposed infrastructure must be located well clear of any potential or core koala habitat. These considerations must be fully addressed in the Biodiversity Development Assessment Report (BDAR). Council requires that any security fencing include wildlife exclusion features to prevent koalas from climbing or becoming trapped. Barbed wire must not be used to avoid injury or entanglement of native fauna.

Fire risk and emergency access

Council recommends early consultation with the NSW Rural Fire Service to confirm fire-trail standards, turning circles for firefighting equipment, water supply points, and construction shutdown protocols on days of extreme fire danger.

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