Submission No 66

INQUIRY INTO IMPACT OF RENEWABLE ENERGY ZONES (REZ) ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES

Organisation: Uralla Shire Council

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Mark Banasiak MP
Chair, Portfolio Committee No. 4 - Regional NSW
By email: PortfolioCommittee4@parliament.nsw.gov.au

Dear Mr Banasiak,

SUBMISSION TO THE INQUIRY INTO THE IMPACT OF RENEWABLE ENERGY ZONES (REZ) ON RURAL AND REGIONAL COMMUNITIES AND INDUSTRIES IN NEW SOUTH WALES

Uralla Shire Council welcomes the opportunity to contribute to the inquiry. Uralla is supportive of renewable energy development within the Shire. The challenge lies in ensuring that renewable energy developments integrate well with local needs, maintaining Uralla's environmental and lifestyle values while fostering sustainable economic opportunities.

Uralla acknowledges the need for urgent action to reduce carbon emissions and Australia's commitment to net zero by 2050. Council acknowledges the comparative, natural advantages offered by the region for the development of renewable energy - proximity to existing population basins and grid infrastructure, excellent solar and wind resources, extent of historic land clearing, and the suitability of topography to pumped hydro etc.

Uralla also acknowledges that the energy transition is occurring at an international scale and that New England is only one of 41 REZs identified by the Australian Energy Market Operator (AEMO), including offshore wind zones, across the eastern and southern Australian states and territories for the National Electricity Market.

This submission responds to relevant aspects of the Terms of Reference.

Uralla Shire Context

Uralla Shire is located in the New England region of New South Wales, Australia and covers an area of approximately 3,230km2. The population is approximately 6,000 people with about half residing in Uralla township or surrounding villages. Uralla neighbours the regional centres of Tamworth (90kms south) and Armidale (25kms north), with about 50% of its workforce commuting to Armidale for work, predominantly in the higher education and health sectors.

Uralla has an older demographic, with a median age of 47. Uralla has low cultural and linguistic diversity with only a small percentage of residents born overseas (7%) or speaking a language other than English (3%). Uralla has a large cohort of First Nations, with 9.5% of the population identifying as Aboriginal. Uralla has historically been a lower-income area with higher availability of affordable housing. Our community has a high degree of cohesion and self-determination, with civil society

playing an outsized role in the provision of services and activities such as social support services, local news, events and cultural activities.

Uralla is known for its rich history, heritage streetscapes, creative community, and picturesque rural landscapes. These appeals have made tourism a significant draw card for the Shire, playing a key role in the local economy. Agriculture is the mainstay of Uralla Shire, mainly being sheep cattle production. Construction is an important local employer, with many trades people operating regionally based out of the Shire. With the development of the New England Renewable Energy Zone ('the REZ'), the renewable energy sector is emerging as a major industry for the area.

Renewable Energy Development in Uralla

There is a pipeline of approximately 5GW of renewable energy generation proposed within or bordering Uralla. This includes ACEN's 400MW Stage 1 - New England Solar farm which has operated since Dec 2023. Notably, at this stage, there is only two consented projects. Several are in advanced stages of planning.

Status	Project	Type	LGA	Developer	Scale
Pre-scoping	Boorolong Wind Farm	Wind	Armidale; Uralla	Squadron Energy	400MW;
Pre-scoping	Salisbury Solar Farm	Solar	Uralla	Origin Energy	
Pre-scoping	Northern Tablelands Wind Farm	Wind	Uralla	Origin Energy	~76 WTGs; 1000(MWh) (BESS)
Pre-scoping	Kurrajong/ Uralla Energy Park	Wind	Uralla	Someva Renewables	~100 WTGs; 600+MW
Pre-scoping	Yarrowyck Windfarm	Wind	Uralla	EDF	~55 WTGs; 400-500MW;
Pre-scoping	Balala Windfarm	Wind	Uralla	EDF	
SEARs issued	Hillview Wind Farm	Wind	Uralla	ACE power	~ 55 WTGs; 300MW
SEARs issued	Hillview Solar Farm	Solar	Uralla	Ace Power	272MW
SEARs issued	Eastern Hub Firming Battery	Storage	Uralla	Ace Power	1000MW/4 hours - 8hrs
SEARs issued	Deeargee Solar Farm SSD-70753725	Solar	Uralla	ACEN	320MW
Response to submissions	Winterbourne Wind Farm	Wind	Uralla; Walcha	Vestas	~119 WTG; 700 MW; BESS 200MwH
Consented	Thunderbolt Wind Farm	Wind	Tamworth; Uralla	Neoen Australia	192 MW; 32 WTGs
Consented	New England Solar - Stage 2	Solar, Storage	Uralla	ACEN	320MW; 1400MW BESS
Constructed/ Operating	New England Solar - Stage 1	Solar	Uralla	ACEN; UPC Renewables	400MW

All but three proposed generation projects depend on the build out of EnergyCo's REZ Transmission Lines to connect to the grid. EnergyCo's estimate for project energisation is for Stage 1 to be delivered by 2032 and Stage 2 by 2034.

Although Armidale sits at the geographic centre of the REZ, Uralla's strategic position places it at the heart of much of the construction activity, particularly the transmission infrastructure. Uralla

township is within a one-way 45-minute commute of much of REZ works, and early engagement with developers, including EnergyCo, have indicated that meeting this targeted travel time improves project delivery, reduces the need for additional workplace health and safety measures to be introduced, and reduces the costs associated with paid travel time. As a result, Uralla will play a pivotal role in the rollout of the New England REZ.

Renewable energy development has the potential to have long lasting, positive impact on Uralla Shire. This includes through:

- Diversification and expansion of the economic base, especially the diversification of farm incomes.
- Influx of public and private capital investment to support the REZ roll-out and beyond, including ongoing community benefit sharing payments.
- Development of new downstream industries e.g. photovoltaic recycling.
- Increased density of regional business and industry networks as a result of meaningful and robust engagement processes necessitated by REZ.
- New opportunities for skills and training in renewable energy and associated industries, including and especially for long-term unemployed and school-leavers.
- Identification of cultural heritage and archaeological sites; opportunities for ongoing access to Country due to EIS process and land-use change.
- Opportunity to identify and protect biodiversity through EIS processes; opportunities for regeneration and restoration of degraded agricultural land as part of renewable energy projects.
- Increased community cohesion and resilience due to holistic, meaningful and robust participatory engagement processes necessitated by the REZ.

Conversely, there is risk of considerable harm if renewable energy development is not managed well. The risks that concern Council the most include:

- Loss of social cohesion and community harmony due to:
    - Conflict over scale and necessity of renewable energy development;
    - Conflict over poorly conceived and implemented developments;
    - Large influxes of temporary workers with no affective ties or ongoing economic interest in the community.
    - Accelerating gentrification due to economic expansion.
- Real and/or perceived lack of community input into planning processes; processes that are non-responsive to Council and community feedback.
- Impact of rapid, temporary 'boom', including;
    - affordability and availability of housing and visitor accommodation;
    - congestion of existing services and infrastructure, local businesses, especially healthcare;
    - consequences of economic contraction and population outflows on the other side of peak construction.
    - ability of local suppliers and businesses to effectively scale and take advantage of new demand.
    - Competition for trades, and other workers with renewable energy developments in a context of very low unemployment rates.
- Need for Councils to expand their activities and functions to support REZ development without concomitant funding increase or additional sources of finance; increased financial burden due to greater infrastructure needs

- Capacity of Council to attract and resource specialist and technical officers etc. to adequately participate in SSD processes, adequately assess and respond to impacts, engage with community.
- Dilapidation of Council roads due to haulage impacts and the considerably higher numbers of vehicular movements due to influx of workers. The associated costs and limited capacity of Council to maintain roads that are not included in various project EIS, and not acknowledged as transport routes but were never designed for the higher frequency of use and heavier traffic.
- Water use greater than current supply can sustain.

- Loss of visual amenity; industrialisation of highly-valued and aesthetic rural landscapes.
- Loss and fragmentation of remnant native vegetation and habitat due to land-clearing, especially for wind turbines.
- Lack of measures to lessen bird and bat mortality, for example avian radar technology use for wind turbine projects.
- Longer-term risks associated with inadequate decommissioning arrangements.

Current and projected impacts of projects within renewable energy zones in Uralla Shire
There is a great deal of uncertainty about the cumulative impacts of projects within Uralla Shire, and the NE REZ more broadly. Rigorous regional-scale analysis is needed to understand and forecast these impacts and, at present, NSW Government is still undertaking this work.

The NE REZ has the benefit of longer lead times, and the potential impacts are malleable because projects have not begun in earnest. It is clear that the government agencies, particularly EnergyCo, are learning from the experiences of Central West Orana REZ (CWO REZ). For example, whereas Mid-Western Regional Council were required to undertake a (resource intensive) Planning Proposal to enable temporary workers accommodation under their LEP, Councils in the NE REZ will benefit from recent changes to the State Environment Planning Policy (Housing) which provides a statutory pathway for workers accommodation within REZ Councils.

Council is also learning from both project exposure and proactive networking and engagement with other REZ Councils. Uralla's Mayor, Robert Bell, is a member of the Coalition of Renewable Energy Mayors. As Uralla has only one constructed solar farm, project impacts are, for the most part, yet to be realised. ***We are at a point in the development of NE REZ where a continued, proactive approach by NSW government can tilt us solidly toward realising the benefits and avoiding the worst risks.***

Uncertainty
Uncertainty about the timing, feasibility, and government commitment to the New England REZ, and the renewable energy transition more broadly, has a negative impact on the ground. Uncertainty contributes to heightened anxiety about project outcomes, and mitigates against local investment in skills and training, business capacity, industrial and housing development etc. Local supply chains need a steady-as-she-goes approach. Step-changes in government policy, diversion of the current resourcing, and any associated loss of momentum should be avoided.

Cumulative impact analysis
EnergyCo have commissioned a series of cumulative impact studies and have invited Councils to provide data and information to support consultant analysis. We expect these studies to support planning for future infrastructure needs, noting that REZ developments will require utilities such as water, waste, and road networks in addition to the infrastructure planning outlined in Uralla's Integrated Planning and Reporting.

Whatever these as yet unknown additional demands may be, they will impose costs beyond standard operations. Uralla's operational costs already exceed its revenue, and consequently, Uralla will require sources of external funding to finance infrastructure construction, asset maintenance and depreciation, to prevent increased financial burden to Council.

Uralla has recently participated in a series of in-person workshops hosted by EnergyCo for all NE REZ councils on the following topics:

- Social Infrastructure: Identifying demands and opportunities for long-term community benefits.
- Water and Wastewater Security: Discussing key management issues and current projects.
- Waste and Circular Economy: Exploring waste management, recycling, and circularity opportunities.
- Local Supply Chain: Mapping local supply chains for raw materials, services, and workforce needs during construction and operation phases.
- Training and Skills: Supporting planning and strategy for workforce training and skills development.

Workshop forums have provided ample opportunity for Council contributions and 'ground-truthing.' Additionally, in-person sessions provided a valuable opportunity to network with regional counterparts. Not all Councils have prioritised participation and/or coordinated suitable officers to be in these sessions. This in part reflects the resource strain to Councils in sending key subject matter experts and senior staff.

Provision of Council data

Formal Requests for Information from EnergyCo have highlighted gaps in our data administration, especially the administration of spatial data. As this is a specialist area, Uralla would benefit from additional resourcing to support the administration of our spatial data, for example, funding availability for a dedicated officer or secondment from a NSW government department or agency. Making this kind of support available to small Councils would benefit broader state data-sharing processes such as the Emergency Services Spatial Information Library (ESSIL) and the creation of the digital twins.

Accommodation

The construction phase of the New England Solar Farm demonstrated the potential impacts of temporary workers on Uralla's (very thin) rental market. Since 2020, more than 40 rental properties have been listed annually in Uralla. This number remained consistent through to 2022; however, the proportion of affordable rentals dropped significantly in 2022, coinciding with the construction of the New England Solar Farm. These changes in both the number of rental listings and rental affordability, particularly through the period of construction of the solar farm, is indicative of the impact that such projects can have on the market. Managing such demand peaks is important to manage supply strains, support economic stability, and demonstrates the need for long-term planning.

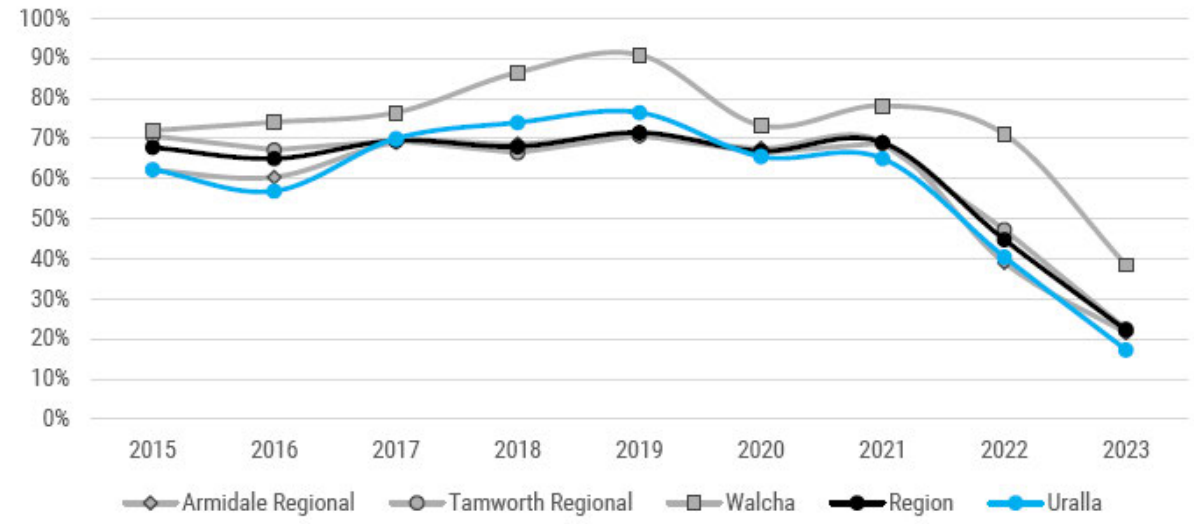

Figure 19 Affordable houses sold in Uralla Region (Source: REMPLAN Housing)

Uralla has directed a portion of its EnergyCo commissioning grants to undertake a Local Housing Strategy. A Local Housing Strategy is required to support a review of Uralla's Local Environment Plan, preparing the Shire for expected growth due to REZ developments. The scope of this work by REMPLAN includes an in-depth analysis of possible growth scenarios, based on early projections provided by EnergyCo and individual renewable energy developers. Developing growth scenarios due to the REZ was necessary because it had not yet been undertaken by any of the departments or agencies delivering the REZ.

At present, there is no coordinated approach to the provision of temporary worker accommodation. Because construction workforce peaks are relatively small and short-lived for individual generator projects, the Department of Planning, Housing and Infrastructure (DPHI) have been satisfied with Accommodation and Employment Strategies (AES) that rely on the availability of private, existing accommodation within Uralla and surrounds, especially the larger centres of Armidale and Tamworth. However, there is growing recognition that this is unsustainable and unsupportable.

Equally, it is inefficient for each project to provide on-site accommodation. Uralla's ageing population is driving a demand for smaller housing typologies that are currently underprovided or not provided in Uralla. At the same time, there is a need to provide accommodation for REZ workers. There is an obvious opportunity for legacy infrastructure and housing development.

Discussions with proponents and EnergyCo have revealed an appetite for accommodation solutions that meet the needs of multiple projects while leaving a legacy of infrastructure and/or housing development within the Shire, however it remains unclear who will facilitate this process. To date it has fallen to Council provide leadership in this area.

We are aware of municipalities where Council's have taken an entrepreneurial approach and partnered with proponents to deliver win-win solutions, such as Dubbo Regional Council. Uralla is keen to follow these examples, but as a smaller municipality it is more fiscally constrained. State Government could effectively de-risk the provision of temporary workers accommodation in Uralla Shire by coordinating (and underwriting) demand.

Workforce
Uralla's current workforce population is around 2,500. Less than 3% of people were looking for work at the last census. Labour shortages and competition for labour are a key concern. Due to the size of the regional workforce and existing labour shortages, it is expected that a high proportion of renewable energy workforce will be temporary, 'drive in-drive out' (DIDO/FIFO).

Engagement with EnergyCo and project proponents indicate market constraints, such as port capacity, component production, local inputs, etc., may create natural limits to the number of projects that can be under construction at any one time. This suggests a smaller peak workforce engaged for a longer duration as projects are "naturally" sequenced by market constraints.

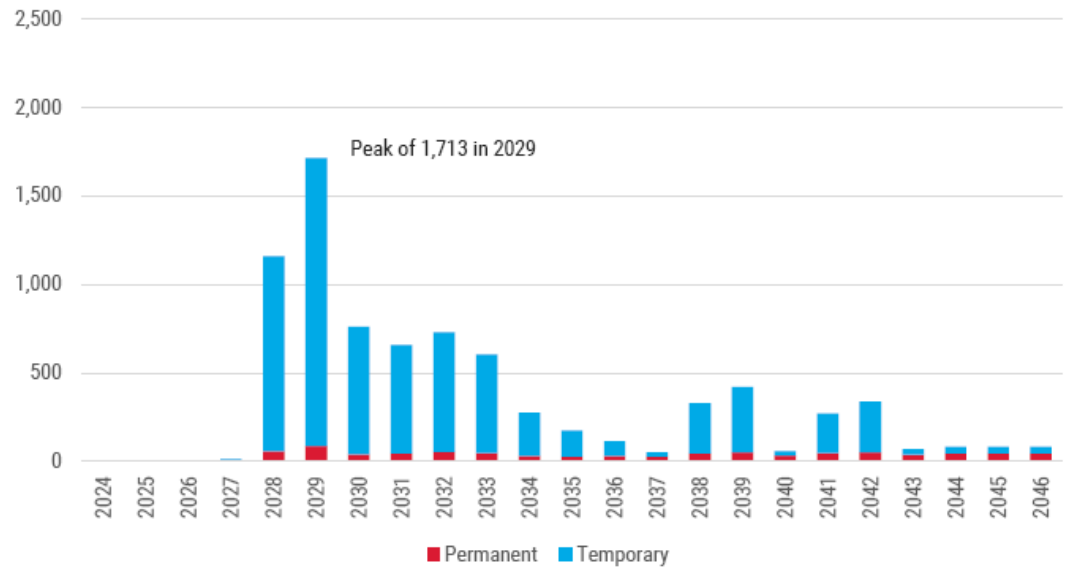

Figure 34 Growth scenario, permanent and temporary workers

REMPLAN modelled several scenarios to estimate growth in temporary and permanent workforce to inform Uralla's housing strategy. The scenario outlined in the Figure above assumes all projects under assessment or that have been approved would proceed, but generation projects of the same type are sequenced over time. Uralla is planning for a peak of 1,713 in 2029.

Workforce cumulative impact modelling is being undertaken currently by UTS Institute for Sustainable Futures for the entire New England REZ. This report is expected to provide clear directions on the role of Council in supporting the development of local renewable energy workforce.

Uralla participates in the New England Skills & Workforce Working Group facilitated by Regional NSW (DPIRD) which includes members from relevant state agencies such EnergyCo, the Department of Education, regional councils, University of New England, training organisations, and industry. This Working Group is identifying key barriers and opportunities for local workforce development.

Biodiversity, habitat and agricultural land-use conflict
Concerns regarding biodiversity and the impact on threatened species are becoming a focal point for the community, particularly in relation to wind turbine developments. One key issue is the emerging

land-use conflict between wind turbine generators (WTGs) and remnant woodland Threatened Ecological Communities (TECs), which are often located on ridgelines and marginal land that has historically been unsuitable for farming. These areas serve as critical habitat for native flora and fauna, making their preservation essential for maintaining regional biodiversity.

Governments must ensure that these projects do not exacerbate biodiversity loss. Given the inadequacy of NSW's current system of laws and regulation, recent changes to the biodiversity offsetting notwithstanding, there are no guarantees. These issues extend beyond renewable energy projects to other land-uses, including agricultural uses.

To ensure that renewable energy developments align with ecological conservation and community expectations, there is a need for comprehensive biodiversity mapping within Renewable Energy Zones (REZs). The establishment of clear and unambiguous 'no-go zones'—areas where environmental offsets are not available—would provide a framework for appropriate site selection. This proactive approach would help minimise conflicts between renewable energy infrastructure, ecological values, and existing land uses, ultimately supporting both environmental sustainability and social license for new projects.

The Building Better Biodiversity on Solar Farms Guide (2024), developed by the University of New England, Community Power Agency and local ecologist, Dave Carr of Stringybark Ecological, highlights that renewable energy development can do better or worse for nature. Where biodiversity considerations are integrated from the outset of planning, new renewable projects can support on-site regeneration efforts, reversing damage caused by historical grazing practices.

Voluntary planning agreements and Community Benefit payments

Uralla has benefited from recent state policy guidance on Community Benefit sharing, adopting the following minimum community benefit thresholds:

- $850 per MW per annum for solar energy development, and
- $1050 per MW per annum for wind energy development, and
- 1.5% Capital Investment Value and/or a dollar amount per MW per annum for storage and other infrastructure as negotiated with project developers, paid over the life of the development and indexed to CPI.

Uralla has entered into two VPAs to date, both for projects straddling two LGAs. Administration of VPAs have been largely cost-recovered from proponents. If and when projects start, community benefit payments will be directed to a Community Benefit Restricted Fund and administered under governance arrangements that ensure community participation in decision-making.

New England Solar Farm, established prior to the REZ, has no formal benefit sharing arrangement with Council. Owner-operator, ACEN Australia, has a Social Investment Program that provides a range of smaller grants to local organisations, including Council. ACEN has contributed approximately $200,000 to the local community over the past two years, and this investment has been well received.

While ACEN models good corporate citizenship, their program highlights the importance of formal community benefit sharing arrangements administered through VPAs. Community benefit sharing payments that devolve towards "grants" and "sponsorship" arrangements obfuscate the obligation of developers to offset the impact of their developments on their host community. Smaller grants, by

their nature, have limited impact - there's only so many shade sails and football jerseys a community needs.

Capacity building
Expected incomes from future streams of Community Benefit payments represent an unprecedented windfall for our community. Council would like to ensure that community benefit payments are put towards major, legacy projects, but there is need to build capacity within our community to direct these funds appropriately. To this end, Uralla is receiving assistance through a non-government initiative, *Striking a New Deal (SaND)*, to undertake an overview of the broad participatory engagement that will be required. Additionally, Uralla's strategic planning officer participates in a regional network facilitated by NGO RE-Alliance which facilitates knowledge sharing and networking between members from across Australia. Most of the challenges and opportunities facing the NE REZ, are shared by other jurisdictions. It seems to us that support of this kind should be available to more REZ Councils and given the need to build social license for the transition, that it should not fall to philanthropists to stand it up.

Current and projected supply and demand levels of manufactured products, raw materials, and human resources
Human Resources
Council has entered into a funding agreement with EnergyCo that provides a grant of $250,000 annually for three years. These payments have supported resourcing of strategic planning and engineering project management functions within Council. These roles could not be funded without the EnergyCo payments. Uralla has also directed it's EnergyCo funding towards developing a Local Housing Strategy, required to undertake review of statutory controls and position the shire for REZ-related growth.

However, these payments are overly scrutinised and 'tied,' requiring high-level of administrative support from finance officers and undermining Councils autonomy to direct funds where it sees fit. Payments are made in arrears, quarterly, upon receipt of detailed report and invoice. Uralla shares with several other Councils, the experience of expending funds in good faith, but later being denied reimbursement or having to provide further explanatory commentary and justification. This erodes trust and again increases the burden of an already stretched staff at the cost of local Council.

Further, anticipated timelines for the EnergyCo transmission project and many generator projects have been pushed back, and the scope of pre-delivery work for NEREZ has expanded. The initial three-year funding agreement is already in its second year, yet onsite work is still over a year away. EnergyCo Council funding agreements should be extended to reflect these delays and changes in scope.

Council welcomes the proposed EnergyCo Community and Employment Benefit Program but views it as a supplement, not a replacement, for guaranteed ongoing support. Grant-based funding is also more resource-intensive to administer.

Waste
There is currently no obvious local solution for the appropriate disposal of REZ construction waste; no LGA within the NE REZ has capacity to deal with the significant waste and recycling requirements. However, in Council engagement workshops with EnergyCo, several opportunities were identified for regional circular economy and waste management. These opportunities will require expansion of existing facilities and associated EPA permissions etc.

Uralla has identified an opportunity to develop a spent quarry into a construction waste disposal and recycling facility. However, due to Council's fiscal constraints this would require direct state government support. End-of-life recycling and management of photovoltaic cells has been identified by Council as a long-term, sustainable development opportunity for Uralla. Council is working with the Regional Economic Development team within DPIRD to position the Shire for this kind investment.

Water

Water demand emerging as key cumulative impact in the NE REZ. Water scarcity is an enormous source of social license risk to renewable energy development. EnergyCo have appointed consultancy Jacobs to undertake a cumulative impact study for the region which is expected to provide a rigorous analysis of the limitations. We expect that they will find that adequate supply cannot be provided from local sources.

Concrete batching for wind turbine gravity foundations entails very high demand for water, yet no EIS we've seen discusses the relative merits or costs of alternative footing designs. Officers have raised this with windfarm developers, who have suggested that the extensive geotechnical survey required cannot be undertaken prior to EIS consent which limits developer ability to investigate alternative footing designs. This constraint ought to be investigated by DPHI.

Community consultation and engagement in the development of Renewable Energy Zones, and associated projects

We understand that the REZ development is now subject to a Cabinet-level steering group process whereby the agencies involved in delivery have regular dialogue at the highest levels. This change was communicated during a recent visit to the region by Minister Sharpe, who was joined by EnergyCo's project director for NE REZ, Doug Parris. This has translated to an improvement in Council's access to key personnel within EnergyCo, Transport for NSW, and DPHI, and the quality of coordination across the project. Still, it is a work in progress. Disconnect between government departments and agency is a source of risk. Collaboration between delivery and approval agencies in particular should be strengthened.

Communication and consultation with Council by renewable energy developers has been proactive and adequate, in almost all cases. While the EIS process is very onerous and thorough, some important impacts are worked out in detail post-consent, when contractors etc. are brought on and 'ground truths' start to emerge e.g., compliance with accommodation plans, workforce, actual construction inputs etc. These are not easily identified or managed in the approvals process. Project management teams have been responsive to community concerns raised by officers and Councillors during planning and construction e.g., deviation of subcontractors from management plans.

An emerging concern for Uralla is consultation fatigue. We have urged DPHI to reconsider the requirement for all projects to engage a Community Consultative Committee as part of their construction management, in favour of an approach that responds to the reality of multiple, overlapping SSD projects that are alike and spatially clustered in very low-density agricultural communities.

End-of-life and Decommissioning arrangements

There is limited information available on decommissioning and project end-of-life processes. The Private Agreement Guideline from DPHI is expected to improve transparency around

decommissioning clauses and help landowners secure financial assurances. However, there is still no government-regulated protection for landholders, and the risk—though small—of companies becoming insolvent or “walking away” from otherwise profitable projects remains a significant concern.

Battery Energy Storage Systems (BESS) have a relatively short lifespan (6–8 years) and proprietary control within the "box"—patented technology that restricts who can decommission these units. It also appears that land is being purchased for substations and BESS, raising questions about how decommissioning will be handled in the absence of landowner agreements. A clear mechanism is needed to ensure these sites are responsibly managed at the end of their operational life. This issue is also relevant during the operational lifespan of projects as it is anticipated that BESS may be replaced 2-3 times. The above discussed mechanism should also be expanded to cater for correct disposal and management of plant/equipment/parts and the like that are replaced during a Project’s lifespan.

Uralla would like to see more attention given to the options to address the decommissioning risk, such as bonds, trailing obligations, or an industry fund.

Stage 1 of the New England Solar Farm has demonstrated that solar waste streams begin accumulating during construction. The need for recycling solutions, particularly for photovoltaic cells and grid-scale batteries, presents a valuable opportunity for sustainable economic development within the Shire. Council has supported UNSW’s Centre for Sustainable Materials Research & Technology in developing solar panel recycling techniques and would welcome the establishment of downstream industries, such as end-of-life processing, in Uralla.

Yours Sincerely,

Ms. Toni Averay
General Manager
Uralla Shire Council

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