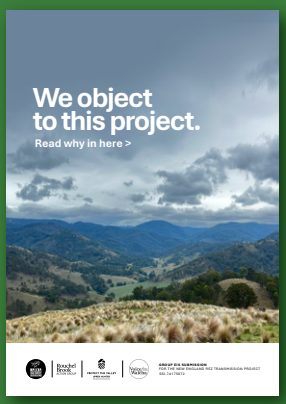
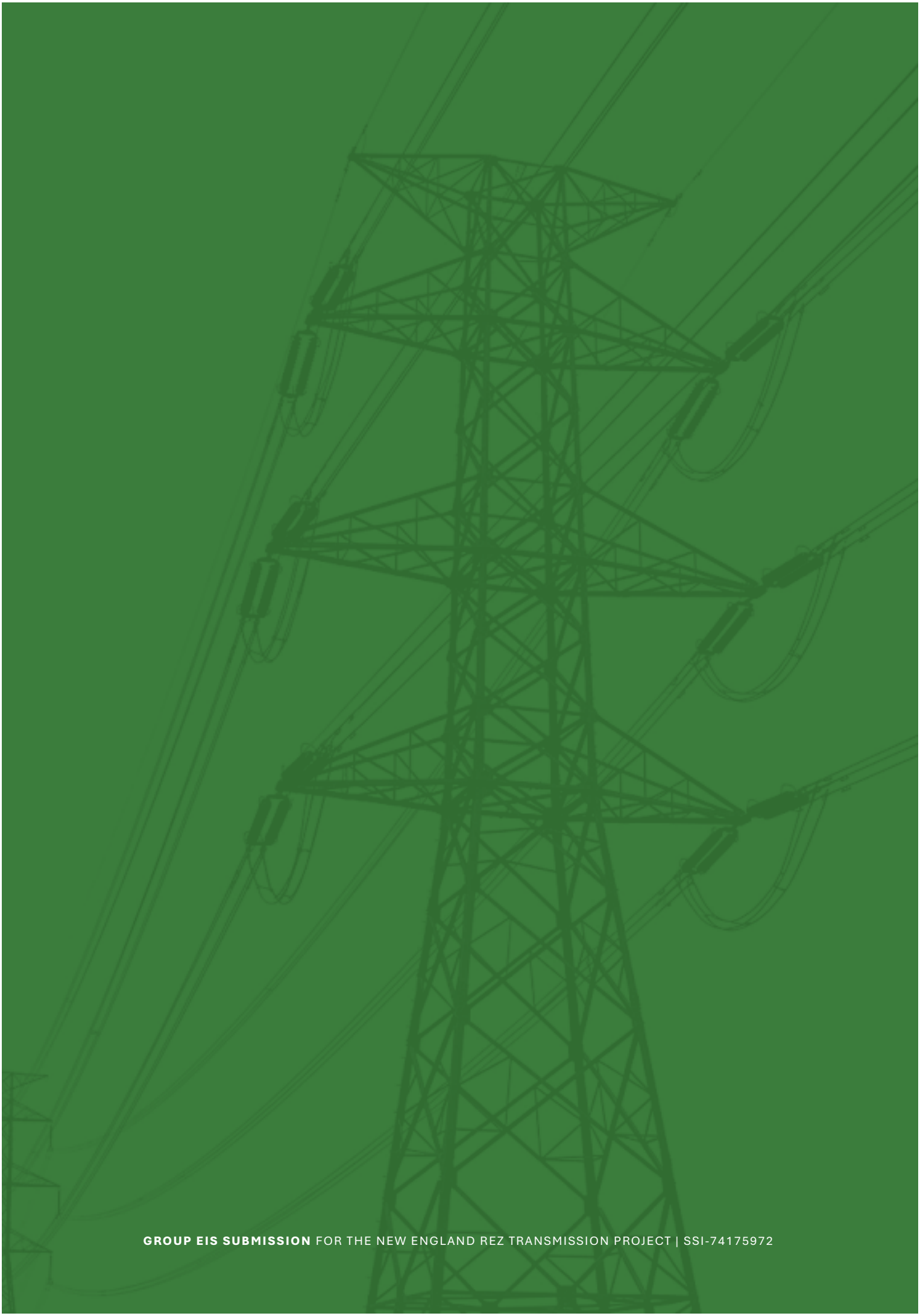
SECTION 1

Strategic Justification and Project Need

THIS IS **ONE** SECTION OF **TWENTY TWO,**
THAT FORMS PART OF A LARGER GROUP SUBMISSION
TO THE NEW ENGLAND REZ TRANSMISSION PROJECT
SSI-74175972



Walcha High Country Guardians | Rouchel Brook Action Group | Protect the Valley Upper Hunter Responsible Infrastructure Group | Voice for Walcha



GROUP EIS SUBMISSION FOR THE NEW ENGLAND REZ TRANSMISSION PROJECT | SSI-74175972

SECTION 1

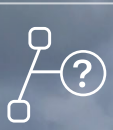
Strategic Justification and Project Need

Key issues we have found ...



Generation commitments remain unproven

Major project withdrawals leave the EIS without a demonstrated pipeline of financed generation and storage to justify the proposed network.



Central South lacks clear justification

Skye Ridge's withdrawal leaves the Central South Hub relying on undisclosed early proposals, with its scale and facilities requiring justification.



Costs and benefits need retesting

Rising transmission costs, changed generation economics and average renewable resources require an updated assessment of the network's costs and benefits.



Retest need after QNI deferral

QNI Connect has been deferred, yet New England's actionability was not retested before anticipated status became part of its justification.



Regional delivery capacity remains unproven

Water, housing, labour, materials and waste capacity remain unresolved across the wider REZ, undermining confidence that promised generation can arrive.



Compare alternatives before committing

Hunter mine land, western renewables and metropolitan solar with storage need fair comparison before approving this network's scale and impacts.

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Read in more detail >



> Image - 400 meters from proposed transmission towers, Forest Way

SECTION **1**

Strategic justification and project need (EIS Sections 2 and 26): can the REZ deliver the generation this transmission depends on?

SUMMARY

The EIS asks the Minister to approve 6 GW of consumer-funded transmission for a renewable energy zone whose generation case has largely fallen away since it was declared in December 2021. The powerline has no benefit in isolation. Its justification depends entirely on enough generation and storage being financed, built and connected in time. The evidence now points the other way, and the EIS does not test this.

1. **Generator interest was speculative.** The interest that shaped the network's scale, hubs and route was largely unfunded. The Walcha Energy portfolio behind the Central South Hub was always fickle and has gone entirely. Despite significant changes in the generator interest, the layout of hubs and subsequent transmission corridor is largely unchanged.
2. **Investors are leaving.** In 2026 Squadron abandoned Boorolong Wind, Origin abandoned Skye Ridge Wind and Alinta abandoned the Oven Mountain pumped hydro project. These were significant projects in the scope of the New England REZ. No major new investor has entered.
3. **The economics have reversed.** Wind's capital-cost premium over solar has grown from 30% to 100%, battery costs keep falling, and the region's flagship pumped hydro project has proved uneconomic. A REZ conceived to supply wind and long-duration storage has lost much of its role.
4. **Transmission costs have soared.** NEM transmission costs have roughly doubled, and Central-West Orana has gone from about $650 million to more than $5.5 billion. The New England line is longer and more complex, yet its cost is unpublished. With fewer generators and an average resource, consumers would pay far more for each unit it delivers.
5. **The wind advantage has gone.** Under AEMO's improved modelling (2026 ISP), New England remains an average (C) wind resource while competing regions have moved ahead of it. Why is the state government pursuing the build of a wind-based REZ in an area where the wind resource is not superior?
6. **The network context has changed.** QNI Connect is now a future project for 2041-42. New England's anticipated status in the 2026 ISP was granted at the Government's request and not retested. The second stage carries no test of whether generation has been financed.
7. **The region cannot yet build the REZ.** The EIS excludes the water, housing, materials and waste needs of the generation projects it depends on, and EnergyCo's own studies show those needs are unresolved.
8. **Alternatives have not been fairly compared.** Generation on rehabilitated Hunter mine land, a developer-backed far west region and metropolitan rooftop solar and storage have not been assessed as alternatives against the New England 6 GW proposal.

The position sought is an updated, independently reviewed justification of the New England REZ before determination. It should show that the scale, timing and configuration of the network are justified by generation that can realistically be delivered now, not by the development once envisaged in 2019.

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Contents

1. Why this belongs in the planning determination 3

2. Generator interest at declaration was largely speculative 4

3. Investor-backed interest is thin and shrinking 5

4. The economics of a wind and pumped hydro REZ have reversed 6

5. Transmission costs have soared, and a long line no longer adds up on old assumptions 7

6. The New England's wind advantage has gone 8

7. The network context has changed, and the safeguards have gone 9

8. The region cannot yet build the REZ, and the EIS does not assess it 10

9. Credible alternatives must be compared before approval 11

Conclusion 13

1 | Why this belongs in the planning determination

The Secretary's Environmental Assessment Requirements require the EIS to analyse feasible alternatives, assess economic, social and environmental impacts, address uncertainty and evaluate the merits of the project as a whole. The EIS addresses these matters principally in Sections 2 and 26. Section 26.7 (page 842) concludes that "the strategic need and benefits of the project outweigh the mitigated project impacts", and that the project is justified and in the public interest. The generation, cost and delivery assumptions behind that conclusion are therefore part of the application, not background to it.

Importantly, the SEARs, under the heading **Economic**, asks for;

- An assessment of the economic benefits of the project for the region and the State as a whole, ...

No one else in the process is asking the question. EnergyCo's remit is to deliver the 6 GW project, not to ask whether it remains justified at that scale. At a 2025 community meeting, EnergyCo's Deputy Project Director for the New England REZ said that sourcing water for projects was for contractors to work out, and that it was not his job to take such issues to the Minister. In July 2026, Portfolio Committee No. 4 (Report No. 65) found that the REZs had been rolled out without a coherent whole-of-government planning framework, and recommended cumulative assessment across projects before individual projects are assessed.

Approval would also be effectively irreversible. Once easements are acquired, tracks cut and towers built, the impacts cannot be undone if the generation never arrives.

The EIS rests the case for need on claims the current evidence does not support:

What the EIS says	Where in the EIS	What the evidence shows
The project is needed: anticipated in the 2026 ISP, critical in the 2025 Infrastructure Investment Objectives Report, and a 'Deliver Now' project	Sections 2.2.1 (page 19) and 26.1.2 (page 831)	Anticipated status was granted at the Government's request and not retested (section 7)
"Further economic and consumer benefits modelling is being undertaken to assess and support the network infrastructure"	Section 2.1.6 (page 18)	The benefits case the Minister is asked to weigh is not yet complete
Renewables with storage and transmission are the least-cost transition	Sections 2.8.5 (page 60) and 26.1.1 (page 829), citing GenCost 2025-26	The same GenCost report shows wind's premium over solar has doubled; it does not show this New England mix is the best way there (sections 4, 5 and 9)
Hubs are sited near areas of high quality renewable energy resources	Section 3.2.4 (page 78)	AEMO rates the New England's wind and solar resource C, average (section 6)
13 to 15 GW of generation and storage could connect	Section 2.3.2.1 (page 35)	A water-planning scenario only; connecting projects will not be known until 2028 (section 3)
The REZ will attract more than $24 billion of private investment by 2035	Section 24.2.4 (page 815)	Squadron, Origin, Alinta and Copenhagen Infrastructure Partners (Winterbourne Wind project) have all exited (section 3)
About 17 million tonnes of CO2-e a year would be avoided	Section 21 (page 734)	Assumes the network displaces 6 GW of coal running continuously all year, and that the generation is built
A network of about 3 GW was considered and rejected	Section 2.8.4.2 (page 59)	Not compared with the alternative programmes in section 9
Cumulative impacts were assessed	Section 24 (pages 776-785)	Limited to approved or exhibited projects, so most REZ generation is outside it (section 8)

The assessment cannot rely on a fully developed REZ to justify the powerline's impacts while treating the commercial and physical ability to deliver that REZ as someone else's problem.

2 | Generator interest at declaration was largely speculative

EnergyCo records that its 2021 registration of interest attracted 80 registrations representing 34 GW of potential generation and storage. Registrations cost nothing and committed no one. They did not establish secured land, planning approval, access rights, finance or an investment decision, yet they were treated as evidence of a deliverable pipeline and used to set the network's scale and route.

The largest single influence around Walcha was the Walcha Energy concept, promoted from about 2019 as more than 4 GW of wind, solar and pumped hydro on the Walcha plateau. Its promoter had no development track record or capital and had not secured the landholders whose land it mapped. Of the nine Walcha Energy wind and solar projects on AEMO's October 2022 generator register, eight were later removed. The ninth, Ruby Hills, became Origin's Skye Ridge, which Origin abandoned in October 2026. None remains.

Central South Hub. EnergyCo's April 2026 feedback report (page 47) says hub scale would be guided by generation demand, and names Skye Ridge as the only publicly known generation project around Central South hub. With Skye Ridge gone, the hub rests on undisclosed and questionable early-stage interest. A community-compiled map, current at September 2026, also records that most landholders across the Walcha district will not host renewable infrastructure. EIS Section 3.2.4 (page 78) says hub siting "has been based on engagement with generators". Table 3.2 (pages 78-82) gives Central South three 1,500 MVA transformers and a 330 kV switchyard for generator connections, as well as its 500 kV links to Central Hub A and Bayswater.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Reconcile the projects that informed the original network design with those now expected to proceed, identifying withdrawals, replacements, changes in size and location, and the strength of investor commitment behind each; and
- Show which Central South Hub facilities are still needed following the withdrawal of Skye Ridge, at what scale, and why they cannot be deferred.

3 | Investor-backed interest is thin and shrinking

Generator interest and investor interest are not the same thing. Developers are rewarded for promoting the size of a pipeline; financiers decide what is built. In 2026 three of the largest projects in and around the NE REZ were abandoned:

Project	Size	What Happened
Boorolong Wind Farm, Armidale	Up to 426 MW	Squadron Energy ended development on 15 July 2026 after a pipeline review, along with its Guyra proposal.
Skye Ridge Wind Farm, Walcha	Up to 870 MW	Origin Energy exited in early October 2026, saying wind construction costs were about 50% higher than in 2020 and that this had changed the economics of progressing this project.
Oven Mountain Pumped Hydro, between Armidale and Kempsey	900 MW, 7,200 MWh (8 hours)	Alinta Energy discontinued the $1.8 billion project on 22 October 2026, citing economic and timing challenges. It had been declared Critical State Significant Infrastructure and received a $10 million NSW Government grant

Boorolong and Skye Ridge together represented 1,296 MW of wind. Oven Mountain was the most advanced pumped hydro project in NSW and the clearest example of the long-duration storage the New England was meant to supply. Elsewhere, Copenhagen Infrastructure Partners reversed its acquisition of Winterbourne Wind in 2025, returning it to turbine maker Vestas. Thunderbolt (approved May 2024, with Commonwealth revenue underwriting) and Hills of Gold (approved September 2024) have announced no financial close. No wind farm has been built in the New England in more than t8 years.

The question remains as to whether a large, credible, well-located replacement pipeline exists. The EIS does not show one. EIS Section 2.3.2.1 (page 35) uses a 13 to 15 GW generation and storage scenario for regional water planning, but acknowledges that the connecting projects will not be known until access rights are allocated in 2028. EnergyCo expects generators to start building after the network, so **the Minister is being asked to approve the powerline before a single connecting project has been identified, let alone financed.**

The EIS's claim (Section 24.2.4, page 815) that the REZ will attract more than $24 billion in private investment by 2035 cannot be reconciled with these exits.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Separate early-stage proposals from projects with secured sites, approvals, access arrangements and committed capital; and
- Test the project's benefits if generation arrives later or in smaller quantities than assumed, and identify which transmission components could then be reduced or deferred.

4 | The economics of a wind and pumped hydro REZ have reversed

The New England REZ was promoted as a wind-led zone with strong pumped hydro potential. Its role was to complement solar-dominant zones by supplying wind generation and long-duration storage when solar could not. That role depended on wind and pumped hydro being cost-competitive. CSIRO's GenCost data shows they no longer are:

Capital Cost	GenCost 2020-21 (2020 estimate)	GenCost 2025-26 (2025 estimate)
Onshore wind	**$1,951/kW**	**$3,248/kW**
Large-scale solar PV	**$1,505/kW**	**$1,621/kW**
Wind cost relative to solar	**about 1.3 times**	**about 2.0 times**
Two-hour battery (total cost)	**$529/kWh**	**$525/kWh**

> Sources: GenCost 2020-21, Appendix Tables B.1 and B.4; GenCost 2025-26, Appendix Tables B.4 and B.9. Each figure is in its own publication's dollars.

Wind's capital-cost premium over solar has grown from about 30% to about 100%. GenCost 2025-26 also reports real battery cost reductions of 20% and 15% in its two most recent annual updates, which is why private capital is moving to solar firmed by batteries. Origin's Skye Ridge decision is this shift playing out in the REZ.

Pumped hydro has gone the same way. AEMO's 2026 ISP inputs reflect higher pumped hydro costs, and Oven Mountain, after years of technical work and planning, could not proceed economically. Identified pumped hydro potential can no longer be treated as deliverable storage.

EIS Sections 2.8.5 (page 60) and 26.1.1 (page 829) rely on GenCost 2025-26 for the general finding that renewables with storage and transmission are the least-cost path. That is the same report that shows wind's premium over solar has doubled. It does not show that this wind and pumped hydro REZ, at today's costs, is the best way to get there.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- provide an updated generation and storage case, at current GenCost costs, showing that the technologies expected to use the network remain commercially credible following the withdrawals of Skye Ridge and Oven Mountain; and
- show that this mix can provide the energy and firming required, including long-duration storage now that the REZ's most advanced pumped hydro project has gone.

5 | Transmission costs have soared, and a long line no longer adds up on old assumptions

Transmission costs had soared further, and the REZ with the longest transmission link loses. This is the New England REZ – with the greatest length of transmission of all the Renewable Energy Zones.

The New England REZ was declared in 2021 on transmission costs that no longer apply. Since then the cost of building transmission in the NEM has roughly doubled, and a REZ that depends on a long new line is correspondingly less economic:

Measure	Earlier Estimates	Current Estimates
AEMO network cost estimates (after inflation)	2024 ISP inputs	Up to about 100% higher in AEMO's 2025 Electricity Network Options Report
VNI West (Victoria to NSW)	About $3.9 billion (2024 ISP)	$7.0 billion (AEMO) to $7.6 billion (proponents), 2025
Central-West Orana REZ transmission	About $650 million at declaration (2021)	More than $5.5 billion (2025)
Western Renewables Link (Victoria)	About $370 million	More than $3 billion
New England REZ transmission	Not published	Not published

> Sources: Renew Economy reporting of AEMO's 2025 Electricity Network Options Report (31 July 2025) and the AER's Central-West Orana determination (6 August 2025); Walcha High Country Guardians briefing to Minister Scully, September 2026.

New England is a bigger job than Central-West Orana: about 305 km against 240 km, with about 290 km of 500 kV line against about 90 km. Yet the EIS publishes no capital cost, and the AER revenue determination comes only after approval. This is catastrophically cart before the horse.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- publish a current capital cost estimate for the full network, broken down by stage and major component;
- show the network cost per megawatt-hour of generation delivered under realistic generation, timing and capacity-factor scenarios, compared with options using existing transmission (section 9); and
- identify which components could be reduced or deferred if costs rise further or generation falls short.

6 | The New England's wind advantage has gone

At declaration, the New England was presented by one of the speculating developers (Walcha Energy) as one of the best wind resources in the country, and that belief underpinned both the zone's location and the scale of transmission planned for it. The EIS still says the energy hubs are sited "in proximity to areas of high quality renewable energy resources such as wind and solar" (Section 3.2.4, page 78).

For the 2026 ISP, AEMO rebuilt its wind assessment using the Bureau of Meteorology's BARRA2 dataset, a 150 metre turbine hub height and an updated model for converting wind into output. Its March 2026 Draft ISP Addendum (page 15) reports higher estimated capacity factors for many REZ's, particularly in southern NSW and South Australia. The New England did not improve. Its grade stayed at C, meaning an average capacity factor of at least 35% but below 40%, while competing regions moved past it:

NSW Region	2024 ISP wind grade	2026 ISP wind grade
New England	**C**	**C**
Broken Hill	D	B
South West NSW	E	C
Hunter Coast	Not rated	A
Illawarra Coast	B	B

> Source: AEMO ISP Appendix A3 scorecards, 2024 and 2026.

Twenty other REZs across the NEM now rate higher than the New England for wind, three of them in NSW. Its solar resource is also rated C. The claim that the New England has a distinctive resource advantage worth major new transmission no longer holds weight.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Correct the resource claims in the EIS (including Section 3.2.4) to reflect AEMO's 2026 wind and solar ratings; and
- Show, against a current comparison with other regions, that the New England's resource is valuable enough to outweigh the cost and impacts of the significant transmission needed to reach it.

7 | The network context has changed, and the safeguards have gone

QNI Connect is now a future project. The New England network was conceived as part of a wider spine, with its northern end linking to QNI Connect, a new NSW to Queensland interconnector. The final 2026 ISP reclassified QNI Connect as a future project, with optimal timing of 2041-42 under Step Change.

AEMO's own testing shows how much this matters. The Draft 2026 ISP (Appendix A6, pages 66-67 and Table 26) modelled New England with QNI Connect fixed as non-actionable:

Scenario	Effect of delivering New England later
Slower Growth	Net market benefits up about $1,038 million; New England not needed within the forecast horizon
Step Change	Deferral to 2038-39 increased net market benefits by about $146 million
Accelerated Transition	Earlier delivery preferred, by about $432 million
Weighted result	Later delivery increased weighted net market benefits by about $231 million

> Source: AEMO ISP Appendix A3 scorecards, 2024 and 2026.

These are draft results, and AEMO's regret measure favoured earlier delivery to guard against underinvestment in the fastest scenario. But they show the project's timing and value are highly sensitive to demand and to the wider network.

Anticipated status was never retested. Following a request from the Minister for Energy in May 2026, the final 2026 ISP treated New England as anticipated, and AEMO states that its actionability was consequently not retested. The EIS then presents that classification as evidence of need (Sections 2.2.1, page 19, and 26.1.2, page 831), and uses it to dismiss the 'do nothing' option (Section 2.8.1, page 57). **A status granted on the Government's advice, without independent testing, cannot also serve as independent proof that the project is needed.**

The design is contracting, but the capacity is not. EnergyCo deferred the south hub in January 2024 and the northern connection beyond the north hub in August 2026. Each reflects weaker demand for the network, yet the 6 GW sought has not changed.

Staging no longer protects consumers. The original plan was 2.4 GW first, with a further 3.6 GW once generator commitments were proven, giving the State a point at which to stop if generation did not materialise. The EIS (Table 3.1, page 66) still describes two stages, but only as energisation dates within one six-year construction program starting in 2028: 2.4 GW in 2032 and a further 3.6 GW in 2034. Approval is sought for the full 6 GW now, and nothing makes the second stage conditional on financed generation. Central-West Orana, by contrast, entered delivery with access rights already allocated above its initial 4.5 GW.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- Explain New England's role, capacity and benefits without QNI Connect, retested independently of its anticipated status in the 2026 ISP; and
- Replace the fixed 2032 and 2034 energisation dates with a staging gate, so that the second stage proceeds only once financed generation is committed to use it.

8 | The region cannot yet build the REZ, and the EIS does not assess it

The powerline delivers nothing unless the region can also build the generation and storage that will use it. The EIS assesses only the transmission project's own needs. EnergyCo's guide to the EIS confirms that it does not assess the water needs of the solar and wind projects planned for the REZ, leaving each to its own EIS, even though they will draw on the same towns, water, roads and housing at the same time.

The EIS does summarise EnergyCo's five Regional Major Infrastructure Studies (December 2025) in Table 2.3 (pages 32-34). Each identifies a constraint with no confirmed solution:

Requirements	What EIS Table 2.3 records	Question still unanswered
Workforce accommodation	Up to 4,800 non-local workers needing accommodation at peak REZ construction	Where will they live, when, and who funds the services? Rental vacancy was 1.2% in Uralla and 1.7% in Walcha in September 2024
Water and wastewater	Increased demand, potentially needing additional treatment infrastructure	Are reliable supply and treatment available in the right places and on time?
Workforce and skills	Limited workforce capacity and low unemployment	What workforce can be secured across overlapping projects?
Waste	Existing capacity potentially insufficient without upgrades	Which facilities will accept the waste, with what approvals and capacity?
Materials and equipment	Demand rises significantly; specialist skills and equipment must come from outside the region, and smaller businesses may need support	Can quarries, plant and transport be in place before demand peaks?

Water shows the gap between estimating demand and securing supply. The transmission project alone needs about 2,400 ML during construction (360 ML potable and 2,040 ML non-potable; EIS Table 3.1, page 66, and Section 3.3.13.1), and the EIS offers a sourcing hierarchy rather than confirmed sources. For the wider REZ, EnergyCo and DCCEEW's October 2026 regional water demand update lowers estimated demand to about 7,318 ML over 2027 to 2035, mainly by modelling 35 projects instead of 114 and stretching the timeline by three years. By its own account, the update estimates demand only. It does not assess sources, availability or other users, excludes pumped hydro, and defers proposed water initiatives to 2027. NSW Public Works has advised that large volumes of reliable water are harder to obtain on the Tablelands, where catchments are small and groundwater sits in unreliable fractured-rock aquifers.

The same update states that each project, including the network itself, must "demonstrate secure water supply and assess cumulative impacts before a planning approval". On the exhibited material, neither has been done. EIS Section 24 includes only projects already approved or on exhibition (Tables 24.1 and 24.2, page 778), which leaves out most of the 13 to 15 GW the network depends on. Its list of relevant projects is also already out of date: Table 24.3 (page 785) has Oven Mountain starting construction in mid-2027, although Alinta abandoned it a week after exhibition began. Section 24.1 (page 777) says its assumptions, including water demand, are "not directly comparable" with the Regional Major Infrastructure Studies. The lines connecting generators to the hubs are not assessed at all.

These constraints compound. Workers need housing; housing needs water, wastewater and roads; concrete needs water, quarries and trucks. Leaving each developer to find its own supply does not show that their combined demands can be met.

> POSITION SOUGHT

That before determination EnergyCo be required to:

- provide a funded, sequenced regional delivery plan identifying critical facilities (water, wastewater, housing, quarries, roads and waste), responsible providers, approvals and completion dates, using the same development programme as the benefits case;
- demonstrate secure water supply for the network and the generation it depends on, identifying sources, volumes and transport; and
- expand EIS Section 24 to assess the transmission together with that generation and the connection assets not yet assessed.

9 | Credible alternatives must be compared before approval

The choice is not between this project and no energy transition. EIS Section 2.8 considers five options: do nothing, using or upgrading existing lines, undergrounding, the project, and "alternative power sources", which it limits to coal, nuclear and offshore wind (pages 57-60). Section 2.8.4.2 (page 59) rejects a network of about 3 GW because of an expected supply shortfall and higher replacement costs. None of these options compares the proposal with renewable generation in other locations, or with distributed solar and storage. They need not replace the whole REZ to matter: a combination that reduces the network's scale, changes its timing or avoids particular infrastructure could change the planning balance.

The comparison is more pressing because transmission has become much more expensive. As section 5 shows, a remote resource must now deliver far more system value to justify the network needed to reach it. That test applies to New England as much as to any alternative.

Already disturbed land in the Hunter Valley

Around 200,000 hectares of mined and degraded land surrounds the Bayswater and former Liddell power stations, historically the largest generation hub in Australia. It may be the quickest place in NSW to build large-scale solar and storage next to existing infrastructure:

- Transmission exists. Lines to Sydney and Newcastle are in place and being upgraded. AGL owns the immediate 10,000 hectares.
- Few landowners and few people affected. Much of the land is held by a few mining companies with rehabilitation obligations to the State, which could be varied so that renewable generation forms part of rehabilitation.
- Adequate resource. Solar is similar to the New England; wind is reasonable.
- Workforce and logistics in place. A skilled local workforce without camps or fly-in fly-out labour, near Newcastle port, with continuity of work as mining declines.
- Load nearby. The Tomago smelter, the State's largest single electricity user, is close by.
- Access roads in place already. Haulage roads already exist, reducing the cost and timeline for access to project sites.

There is already a precedent. In August 2026 EnergyCo announced construction of the 135 MW Muswellbrook Solar Farm and 100 MW battery on a former coal mine site, citing the benefits of using existing Hunter-Central Coast infrastructure. The Bayswater and Liddell precinct could also host data centres powered by local renewables and cooled from Lake Liddell, and PFAS-affected land at Williamtown could host solar and storage near Tomago. A coordinated assessment should identify suitable land, connection capacity, upgrades and timing, including rehabilitation, contamination and ground-stability constraints.

A far west inland renewable region

In February 2026 a consortium of six developers (Tilt Renewables, Iberdrola Australia, Acciona Energía, Ark Energy, Squadron Energy and Voyager Renewables) proposed to AEMO an inland renewable region in western and far west NSW, of about 3 to 4 GW by 2035 and at least 6 GW by 2040, subject to enabling transmission. AEMO rates Broken Hill B for wind and A for solar. Land is sparsely settled, landholder resistance is low, and the proposal has the developer backing the New England pipeline has lost.

The consortium of developers state;

> *"Existing [zones] are constrained by social license, land use and housing capacity limitations, while offshore wind faces high costs and long lead times. These factors underscore the need to unlock inland regions with strong fundamentals and lower development barriers"*

AEMO did not select western options in the 2026 ISP because of their transmission costs, while noting scope to refine those estimates. Any comparison must address that. The point is that both options should face the same current scrutiny of cost, commitment, land, resources and timing.

Metropolitan rooftop solar and coordinated batteries

Generation and storage close to where electricity is used need little new transmission. In June 2026 the NSW Opposition proposed City Renewable Energy Zones in Sydney, Newcastle and Wollongong, and the Government's $557 million Home Energy Saver program funds rooftop solar and home batteries. AEMO's 2026 ISP demand-side work (Appendix A9) also recognises that coordinated consumer resources and distribution investment can reduce the need for other generation, storage and transmission. The comparison must count only deployment additional to current forecasts, and allow for evening and winter supply, storage duration and distribution limits.

Comparing like with like

Test	New England (As proposed)	A. Hunter mine land	B. Far west	C. Metropolitan rooftop
New transmission	6 GW greenfield network	Little; existing lines	Yes, long distance	Minimal
Investor backing	Major exits in 2026	Precedent at Muswellbrook	Six-developer consortium	Household and business uptake
Resource (wind / solar, AEMO)	C / C	Reasonable / similar to NE	B / A (Broken Hill)	Solar only
Landholders affected	Many, largely unwilling	Few, mostly mining companies	Few	None
Workforce and housing	Imported; camps needed	Local, skilled	Mining workforce	Existing trades

Each option should be assessed against the same electricity, reliability and emissions objectives, delivery dates and statutory targets, including public cost, consumer cost, delivery risk and environmental impact.

Conclusion

Every assumption that justified a 6 GW network through the New England has weakened since 2021. The speculative pipeline has gone, major investors and the region's flagship pumped hydro project have left, wind and pumped hydro have lost their cost advantage, the wind resource is average, QNI Connect is deferred beyond 2040, and the second stage has no generation gate. The region cannot yet supply the water, housing and materials the REZ would need, and better-suited alternatives have not been compared.

These are not matters conditions of approval can fix. They go to whether the project is needed at this scale and whether its benefits will ever outweigh its impacts. The central gap is between the benefits attributed to a fully developed REZ and the evidence that it can be delivered.

> POSITION SOUGHT

The Department should not recommend determination until EnergyCo has done the following, and the results have been published and exhibited for comment.

Strategic justification

- Commission an independent, third-party reassessment of the project's scale, timing, configuration, cost and supporting generation, and revise EIS Sections 2 and 26 in light of it, including each claim in the table in section 1.
- Use the Estimated Development Cost supplied to the Department to test the benefits under current generation and delivery scenarios, including higher construction cost and lower or later generation uptake, and publish the results.
- Retest the project's need and consumer benefit without QNI Connect and without relying on its anticipated status in the 2026 ISP. Where any Consumer Trustee or system-planning assessment is relied on, explain what it actually tested and whether it addresses the changes raised here.

Generation deliverability

- Reconcile the projects that informed the original network design with those now expected to proceed, and identify by hub the committed and financed generation and storage against the 13 to 15 GW scenario in EIS Section 2.3.2.1.
- Explain which Central South Hub facilities remain necessary following the withdrawal of Skye Ridge, and why they cannot be deferred.
- Show that the expected generation and storage mix is commercially viable at current GenCost costs, following the loss of Oven Mountain, and that sufficient land is available from willing hosts.

Regional capacity

- Add to the EIS a funded, drought-secure water supply plan for constructing the generation needed to fill the network, identifying sources (that have known deliverability), volumes and transport.
- Expand the cumulative assessment in EIS Section 24 to cover the transmission together with the generation it depends on and the connection assets not yet assessed, including housing, roads, materials, waste and emergency services.

Alternatives

- Assess, with costs and against consistent objectives, the three alternatives in section 9 and a reduced-scale and genuinely staged New England network.

If any approval is contemplated

- Limit it to a first stage sized to financed generation, with a binding gate before any further stage tied to financial close of real generation projects.

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WALCHA HIGH COUNTRY GUARDIANS

Rouchel Brook ACTION GROUP

PROTECT THE VALLEY
UPPER HUNTER
RESPONSIBLE INFRASTRUCTURE GROUP

Voice for Walcha