

# ReD4NE Protocol

## ReD4NE: Responsible Energy Transition and Securing Social Licence in the New England

ReD4NE has intentionally chosen a DNA based on advocating for responsible energy development. We have identified our core protocols directed at delivering on responsible development outcomes and the requisite creation of social licence.

ReD4NE advocates that the following eight (8) protocols should form the standards which underpin the New England's energy transition. We promote these protocols as environmental, social and governance -ESG guidance for Governments state and local, for developers and for investors who respect need to facilitate genuine socio-economic outcomes acceptable to the community. These protocols present as fiduciary benchmarks for responsible investment in renewable energy development in the NE REZ.

ReD4NE seeks a just and equitable transition based on the following responsible development protocols

### **Protocol 1 – Genuine social licence**

we need genuine community equity and expectations, based on real community acceptance and inclusion within 'top down-bottom up' decision making on real benefit sharing for the community and respect for the physical and mental wellbeing of the community.

### **Protocol 2 – Strategic land use planning**

more inclusion for the community on robust infrastructure planning and placement including the avoidance of land use conflicts and transmission route planning.

### **Protocol 3- More balance in “food versus fuel” rollout**

many of ReD4NE members are involved in agricultural production – they appreciate firsthand the savages of climate change. ReD4NE acknowledges the urgency emerging from the IPCC 6 Report, particularly in relation to the stability of food supply which is projected to decrease as the magnitude and frequency of extreme weather events that disrupt food chains increases. ReD4NE however opposes the use of good productive agricultural land for large scale renewable energy generation and transmission.

### **Protocol 4 – Aligning project developer business values and ethics with the community expectations on:**

- supply chain standards -recognising the protection of human rights in manufacturing.
- the elimination of potential toxic pollution from the deployment of sub-standard technologies.
- respect for indigenous landowners and their rights and cultural heritage.
- the adoption of clearly defined, and guaranteed, ethical standards when dealing with impacted communities.

### **Protocol 5 - The protection of the New England’s natural environment and landscape**

The promotion of infrastructure which synergises, protects and promotes for;

- biodiversity conservation and habitat objectives
- catchment health and management protection for water quality for the Murray Darling catchment, the Macleay River catchment and the adjacent coastal communities
- preservation of national parks for existing heritage assets and public enjoyment
- better management of bush fire risks; and
- the protection of native vegetation and habitat objectives

### **Protocol 6 - Promoting product stewardship**

which promotes for stronger demonstrable responsibility and scientific certainty for 'end of project life' liabilities including provision for decommissioning surety bonds and clear accountable waste stream management planning.

### **Protocol 7 - Promoting right size development**

consistent with the need to avoid oversizing projects and cumulative impacts

### **Protocol 8 - Ensuring real socio-economic advantages**

which facilitates for development which builds real and tangible job creation and economic opportunity for regional communities.



generation , from new transmission and from a combination of both , unless immediate steps are taken to access and address the accumulation of these impacts. This outlook should strike alarm bells for Federal Government's and its interest in productivity enhancement.

We take the liberty in this introduction of highlighting our concern that whole communities are at risk. To support our concerns we table just **one example** the township of Uralla, which could face cumulatively '*the death of a thousand cuts*'<sup>2</sup> whereby no one single project or 'cut' can cause social, environmental and economic damage. However incrementally, sustained and combined effects of a number of wind and solar projects to Uralla's east and west together with a confluence of dual 500kv and multiple 330kv high voltage above ground transmission converging on Uralla require **strategic cumulative assessment**. The solar outlook alone, based on foreseeable projects to the east of Uralla, on largely high-quality agricultural land ,suggest an approximate deployment of 5.5M solar panels or 2700 panels per head of population<sup>3</sup>. Added to this outlook Uralla is also a logistical centrepiece in a '*one lane in - one lane out*' transport nightmare for the New England REZ development. ReD4NE appreciates that there are community proponents in favour of this amount of development and who believe it's in Uralla's economic interests. Whilst the underlying reason for this individual belief is understood, these proponents at least owe it to **the whole of the community** to have the potential cumulative impacts assessed against forecast economic and social benefit. The proposed infrastructure is pervasive and multigenerational and an **all cost -benefit- risk assessment** needs to be on the table for the whole of the communities understanding.

**Context** – In contemplating this ICIA it would be appropriate fall back onto the following interpretation:

- The strategic level planning framework for the REZ development – *unfortunately there isn't one.*
- The REZ community consultation process deployment by Government in establishing the REZ – *unfortunately there isn't one.*
- The REZ strategic land use planning assessment deployed by Government in establishing the REZ - *unfortunately there isn't one.*
- It would , on the Communities experience, be *an overstatement* to conclude State Significant projects are *subject to comprehensive assessment with extensive community participation* under Planning Act; and
- Evidence from the NSW planning system<sup>4</sup> that REZ project proponents in approaching a development see cumulative impacts assessment as anything more than a '*tick the box*' procedural process – unfortunately there is no evidence as the majority project proponents are more often 'just speculators –or flippers' with zero interest in owning the project or bringing it to fruition. ReD4 acknowledges there are exceptions.

We draw the obvious conclusion that the Roadmap REZ rollout placed great emphasis on **speed to transition** -commitment to net zero with neither minimum interest in strategic planning and nor strategic environmental assessment. The result is that we are left with a

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<sup>2</sup> Chief Justice BJ Preston NSW Land and Environment Court

<sup>3</sup> Based on the existing deployment at New England Solar 3,467 panels per 1MW

<sup>44</sup> NSW Environmental Planning and Assessment Act 1979

‘nobbled’ planning framework promoting an ineffective environmental impact assessment process constrained at a project level rather than being able to **promote a strategic assessment** by examining the effects of multiple activities across larger geographical areas and over longer timeframes. In addition the Planning Act is a ‘back end’ process<sup>5</sup> there is no requirement to conduct an EIA<sup>6</sup> at site selection- scoping stage – there is no requirement to table alternatives to the project until EIS being some 2 plus years post-acquisition. This process together with the over stimulation of the NSW Renewable Energy Action Plan and the competition for access rights means that short run profit driven proponents, may not search for the most suitable site with the right environmental and social credentials.

In confirming the urgency of an ICIA, ReD4 acknowledges, as is well established in its Constitution and Protocols, of the **need to transition**, of the **need to decarbonise** existing energy supply profiles. However Red4 and all other communities concerns cut to **the way the transition is executed**. At it sits at the moment the perceived cumulative impacts on rural and regional communities are an unfair burden which clash with ambitions of a **just** transition. City based energy consumers must acknowledge this imbalance.

## Proposed Terms of Reference

### Key Project Assumptions

- **Network Capacity** – 2.4GW to 2032 -6GW to 2034 - 8 GW to 2034 and beyond
- **At 6 GW Available Transfer Capacity (ATC)** 12 GW of generation and 4GW of storage.
- **At 8 GW target** assume 5GW of Wind (16GW installed and 2,560 6.6 MW WTG )and2GW of Solar and 1GW PHS
  - new transmission infrastructure comprising:
    - two new double-circuit 500 kV transmission lines to connect the New England REZ to the existing NSW transmission network near Bayswater Power Station, located west of Singleton NSW;
    - new 500 kV and 330 kV lines to connect to the proposed energy hubs within the New England REZ,

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- four new energy hubs to connect future renewable energy generation and storage Projects within the New England REZ to the new 500 kV transmission infrastructure and a northern connection to link the North Hub with the existing 330 kV transmission network, and
- ancillary development, including road works, upgrade and/or augmentation to existing electricity and utility infrastructure, provision of communications infrastructure, and other construction-related works and facilities such as workforce accommodation camps.

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<sup>5</sup> NSW Chief Justice BJ Preston of the Land and Environment Court

<sup>6</sup> Environmental Impact Statement

1. **What should be geographical areas ('GAs') of Assessment** – the ICIA needs to contemplate the following five (5) geographical study areas ?
  - a) The REZ Composite.
  - b) The 50km radius of Armidale City.
  - c) The 50km radius of Guyra
  - d) The 50km radius of Uralla; and
  - e) The 50km radius of Walcha
  
2. **What should the Impact Timelines ('ITL') be ?**
  - a) 2025-2026 Base Year
  - b) FY 2026- 2027
  - c) FY 2027-2028
  - d) FY 2028-2029
  - e) 2030 beyond
  
3. What will be the Impact on **Agricultural Production and Agricultural Jobs in each of the GAs. ? What will be :**
  - a) Loss of high -quality agricultural land
  - b) Loss of agricultural production.
  - c) Reduced availability of agricultural services
  - d) Loss of agricultural jobs.
  - e) % FTE jobs in energy.
  
4. What will be the Impact of **Resource Availability** for Construction ?
  - a) Water for construction for each of the GAs in each of ITLs
  - b) Gravel and Aggregate for construction -tonnes increase
  - c) Waste Water ML increase.
  - d) Waste Facilities Tonnes increase.
  
5. What will be increase in **impact of noise and dust** for GAs b) to e) over ITLs ?
  
6. What will be the increase in **loss of visual amenity** for GAs b) to e) over ITLs ?
  
7. What should landowners expect in terms of overall **decrease in land values** in GAs to over ITLs ?
  
8. What will be the general impact on **business economics post construction -on tourism** on a composite and GA specific for the specified ITLs
  
9. What should the NE expect as to overall **decrease in biodiversity, including the fate of threatened/vulnerable species?**

This particular study needs to be conducted by recognised, independent specialists.

The Northern Tablelands holds some of the most significant koala populations away from the coast and is a valuable bioregion for many other threatened species.

The cumulative impacts on koalas and other sentinel fauna of clearing of remnant vegetation incl TSRs, disruption, dust and noise during the construction phase, infrasound, night light, flicker effect and vibration are all factors which need to be considered when this study is carried out.

To assist the ICIA demonstrate the destructive power of cumulative impact, we cite the peer-reviewed survey carried out in Tasmania which quantified cumulative impact of successive wind projects on two species of eagle, the endangered sub-species of the Wedge tailed Eagle *Aquila audax fleayi* and the vulnerable White bellied Sea eagle *Haliaeetus leucogaster*. **Between 2010-2022, wind turbines caused the deaths of at least 272 endangered Wedge tailed Eagles (out of a population of around 1200) and 49 vulnerable White bellied Sea eagles.**

10. Will there be an overall **decrease in hazard reduction capability** – increased hazard risk reduced access ? This includes aerial fire-fighting,airlift for rescue and recovery.
11. What will the **impact on demand on New England Highway and local roads networks** ?
  - a) Overall % increase Demand Usage REZ Composite for ITL
  - b) Overall reduction in road access for community % change to base year
  - c) Overall reduction in road safety
  - d) Overall increase in OSOM for Composite ITL and for GA's b) to e)
  - e) Overall increase average road maintenance costs /km
  - f) Increase in % costs for non-rate paying users
12. **What will be the population increase impacts?** – Construction Workers -Plus Families (% of additional population ) in each of the GAs ?
  - a) During Construction for each of ITL
  - b) Post Construction 2030
13. **What will the population impacts ?** - Construction Worker **Accommodation**
  - a) Existing accommodation in each of the GAs b) to e)
  - b) The available rental accommodation in each of the GAs
  - c) The needs for additional temporary or additional worker accommodation in each of the GA b) to e) .
14. **What will be the Population – Service Impacts ?**
  - 8.1 **Medical ?**
    - a) Increase in demand for GP services
    - b) Increase in ED presentations at REZ hospitals
    - c) Increase in need for additional Paramedics
    - d) Increase in demand for mental health services

#### **14.2 Schooling ?**

- a) Child Care placements
- b) Primary School placements
- c) Secondary School placements

#### **14.3 Resources Impact ?**

- a) Water for domestic consumption across the GAs
- b) Waste water consumption across the GAs
- c) Waste facility availability across the GAs

#### **14.4 Connectivity and Communications ?**

- a) Increased demand in network services -

**Conclusion** – If we follow the model deployed in the CWO -the Government covered 2/3 of the cost of \$150k of an Impacts Report. Managing the Impacts of State Significant Development commissioned by Mid Western Council

<https://www.midwestern.nsw.gov.au/files/assets/public/v/1/development/mwrc-managing-the-impacts-of-ssd-final-v.01.pdf>

They went to tender with the Project being awarded to PWC. It could be argued that NE REZ will be more costly on size and scope. CoREM have been allocated funds some of which they appear to have dispersed on Energy Co acolytes.

It is the expectation of the ReD4 and the Communities of the New England that the Upper House Inquiry will consider this suggested Draft and recommend accordingly to Government. It is further expected that the Councils of the New England will support the imperative

**ReD4NE Committee of Management  
10 September 2025**