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26 November, 2026

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Lodged via: NSW Major Projects Planning Portal
Project Application: New England REZ Network Infrastructure Project
Application Number: SSI-74175972
Position: STRONGLY OBJECT

I have been fortunate to live, work, and manage major agricultural operations across the Walcha district and the wider New England Tablelands for almost sixty years.

My involvement began in 1970 when Dalgety appointed me Branch Manager at Walcha. Within two years, I was appointed New England Regional Manager, overseeing operations across Tamworth, Armidale, Glen Innes, and Inverell while keeping my home and administrative base in Walcha. Later, as Chief Executive of Clyde Agriculture, I directed the acquisition, development, and intensive operation of landmark high-rainfall holdings across the Great Dividing Range.

These included *Wirribilla* and *Glenbrook* - a 12,200-acre (5,000-hectare) aggregation south of Walcha on the Ingleba and Smith Creek catchments feeding the McDonald River - and *Lakeside* and *Cloverdale* (5,619 acres / 2,274 hectares), straddling the basalt crest between Niangala and Nowendoc. On these holdings, Clyde ran upwards of 16,000 sheep and 3,000 to 4,000 cattle on intensive, highly fertilised Italian rye and fescue pastures.

I do not look at this country through abstract models, green ideology, or desktop reports. I know it from practical management across every season over six decades. I know how much capital and discipline it takes to build carrying capacities, how basalt country behaves in sixty-inch rainfall years, and how rapidly topsoil is lost if steep falls are disturbed.

I am lodging this submission to demand that the Department throw out this EIS and abandon the New England Renewable Energy Zone entirely.

A Fantasy Built on Ideology: The "Renewables Transition" Fallacy

The entire premise of the New England REZ rests on flawed climate dogma and the false belief that intermittent, weather-dependent power can run a modern industrial economy.

The worldwide consensus manufactured around climate alarmism is rapidly unravelling. The collapse of momentum at recent COP conferences, combined with growing economic reality across Europe and North America, has shown that international capital and sovereign nations are stepping back from unviable, heavily subsidised renewable energy targets. Electricity grids cannot operate reliably on intermittent wind and solar without enormous, ruinous subsidies and destructive over-engineering of the landscape.

The market has already delivered its verdict on the New England REZ. Despite years of government hype, not one single commercial wind or solar generation project in the NEREZ is under construction or has reached a Final Investment Decision (FID). The developers who promoted these speculative schemes have hit the hard wall of reality: skyrocketing turbine costs, supply chain breakdowns, inflation, and a complete lack of commercial viability.

Even the Australian Energy Market Operator (AEMO) has been forced to slash its forecast capacity for the New England zone from an initial 14.1 GW down to 6.5 GW in its Draft Integrated System Plan (ISP) and Addendum.

The proponent is asking the State to bulldoze hundreds of kilometres of prime agricultural tablelands to build high-voltage wires for generators that do not exist, will not be built, and make no engineering or economic sense.

The Snowy 2.0 Lesson: A Monument to Public Waste

The NEREZ transmission project is shaping up to be an even worse white elephant than Snowy 2.0.

Snowy 2.0 was sold to the public as a $2 billion nation-building project to be delivered by 2021. Today, its cost has ballooned to more than $12 billion, delivery is now expected well past 2028, and energy consumers are footing the bill for catastrophic planning failures.

Building the NEREZ transmission spine repeats this insanity on a grand scale:

- The State proposes committing billions of dollars in taxpayer funds to build 300 kilometres of massive transmission lines, 580 kilometres of heavy-vehicle access tracks, and 130 creek crossings.
- All of this is being forced through private farmland and steep tablelands before a single commercial generator has signed a binding contract or poured a single foundation.

Carving an industrial transmission corridor through prime country on the speculative hope that unbuilt wind factories might one day use it is economic vandalism. It will leave NSW with billions in stranded assets, paid for through inflated power bills and public debt.

Gross Incompetence in the EIS Agricultural and Environmental Evaluations

Beyond its flawed energy thesis, the EIS itself is an insult to anyone who understands land management. The document is full of gross understatements, missed baselines, and desktop contrivances designed to trivialise the real impact on agriculture.

Falsified Land Valuation ($364/ha)

The Agricultural Impact Assessment (Technical Report 6) values grazing land in the corridor at a ludicrous baseline of $364 per hectare (Ch 13, pp. 528/530).

- Real, audited gross margins on improved high-country basalt pastures in this district sit between $800 and $1,400 per hectare, supporting productive capital values of $25,000 to $30,000/ha.
- By estimating prime tablelands at roughly one-third of their true productive worth, the EIS concluded that agricultural losses are a minor "0.1% of regional production."
- A transmission easement, access road, or tower pad across intensive pasture breaks up carefully balanced rotational grazing systems, severs internal water infrastructure, and permanently damages multi-generational capital investment.

Distorting Land and Soil Capability (LSC)

The EIS claims that 96% of the corridor is "low-value" because it falls into Land and Soil Capability Classes 4 to 7 (TR6 §4.2.3, p. 39).

- LSC is a *hazard rating* driven by slope and rainfall, not a measure of pasture yield or commercial output.
- In the 50 to 60-inch rainfall belt around Niangala and Nowendoc, high slopes trigger higher hazard classifications, yet the rich basalt soil beneath them produces some of the highest stocking rates and heaviest cattle in eastern Australia.
- Using a hazard classification to pretend prime grazing country is disposable wasteland is completely dishonest.

Blindness to Weather, Slopes, and Catchment Destruction

The tablelands around Niangala and Walcha form the pristine headwaters of both the eastern catchments and the western Murray-Darling system (the McDonald and Namoi rivers).

- The EIS schedules six years of continuous civil construction, 580 km of heavy tracks, and 130 waterway crossings across steep, erosion-prone falls with zero wet-weather downtime included in its timeline (Ch 3 §3.3.2, p. 105; Ch 12, p. 495).
- It includes no localised high-elevation weather records.
- Anyone who has run cattle in Walcha knows that wet winters turn basalt tracks into impassable bogs. Heavy civil machinery operating on these slopes will rip up the landscape and flush thousands of tonnes of silt into pristine headwaters.

Operational Paralysis and Inadequate Study

- Aerial Agriculture: The EIS admits aerial topdressing and spraying are prohibited inside the easement (Ch 12 §12.4.2, p. 505). In steep tablelands country, aerial fertiliser application is the only way to maintain pastures. Banning aircraft cripples the viability of entire holdings.
- Weeds and Biosecurity: Moving heavy plant across 580 km of unsealed tracks creates an open highway for serrated tussock, Chilean needle grass, and other invasive weeds.
- Zero Real Fieldwork: Technical Report 6 admits that no soil survey was carried out across the easement (TR6 §3.4.1, p. 28) and that its entire agricultural assessment was based on just *two landholder interviews* at Muscle Creek in the Hunter Valley (150 m elevation), without interviewing a single high-country grazier in Niangala or Walcha (1,300 m elevation).

Scrap the Entire Scheme

The New England REZ is a manufactured crisis. It is an unviable, ideologically driven scheme that sacrifices Australia’s finest agricultural land for phantom wind and solar projects that make no engineering or commercial sense.

I have spent sixty years seeing governments come and go, and I have seen the damage caused when bureaucrats in Sydney try to impose theoretical plans on country they do not understand.

I do not want this EIS amended. I do not want more consultation sessions. I do not want post-approval management plans or cosmetic "mitigation."

I demand that:

1. **The Minister and the Department reject the NEREZ Network Infrastructure Project (SSI-74175972) outright.**
2. **The New England Renewable Energy Zone declaration be revoked and scrapped entirely.**
3. **The NSW Government cease spending public money and harassing private landholders for unbuilt, unviable renewable energy schemes.**

This project is bad policy, bad economics, and a disaster for the land and the New England region.

Yours faithfully,

David Boyd