Community Power Agency Submission

Re: Draft New England Renewable Energy Zone Access Scheme Declaration and Consent Assessment Process

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6 August 2026

Executive Summary

Community Power Agency (CPA) welcomes the opportunity to provide feedback on EnergyCo's Draft New England Renewable Energy Zone (REZ) Access Scheme Declaration and the Draft REZ Consent Assessment Process for projects connecting under the access scheme.

The transition to renewable energy presents one of Australia's greatest opportunities to deliver enduring social, economic and environmental benefits for regional communities. As recognised in EnergyCo's Access Scheme Objective 2 ('*Foster community support and regional economic benefits by delivering outcomes and benefits for local communities, seeking to mitigate cumulative impacts and managing land use considerations*'), the success of Renewable Energy Zones will depend not only on the infrastructure they deliver, but also the local and regional socio-economic and environmental impacts and outcomes they generate. In CPA's experience working with communities, governments and industry across Australia, communities increasingly expect renewable energy development to deliver positive regional outcomes alongside clean energy generation. The Access Scheme can help create those expectations by encouraging continuous improvement, recognising and encouraging leading practice across the renewable energy sector.

CPA strongly supports the introduction of the New England REZ Access Scheme as a mechanism providing greater certainty for investors, a transparent and consistent framework for allocating network capacity, enabling better coordination of renewable generation and storage infrastructure development.

However, given that access to publicly coordinated REZ infrastructure presents private developers and utilities with considerable commercial opportunities, we

would argue that the proposed Access Scheme also presents a policy lever to incentivise proponents to deliver maximum public value for New England. We believe the NE REZ Access Scheme could be strengthened and designed to work effectively alongside other existing policy mechanisms that currently influence proponent social performance to ensure that all connecting generation and storage projects contribute positively to communities and landscapes in the New England. To this end, there is considerable discrepancy between the social and community objectives set out in the May 2026 "Department of Climate Change, Energy, the Environment and Water, Guidelines for Access Scheme Declarations", and the proposed assessment criteria for Access Consent under consultation.

In this regard, it is worth noting that:

1) The 2024 NSW Community Benefit Sharing Guidelines effectively set a minimum standard for community engagement and benefit funds used by proponents to negotiate a Voluntary Planning Agreement with the specific local council hosting the renewable energy project.
2) While the Long-Term Energy Service Agreements (LTESA) and Capacity Investment Scheme (CIS) serve to incentivise proponents to plan and commit to social performance by applying weighted social merit criteria to tender assessment, a minority of proponents may seek NE REZ Access rights without bidding for CIS or LTESA contracts.
3) While the Developer Rating Scheme collates data on engagement maturity and corporate capacity; including information on stakeholder engagement, communication, benefit sharing, social impact, Indigenous opportunity, and complaints and dispute management, it does not make this information available on the public register, and does not commit proponents to project-specific community benefit outcomes. In other words, the mere presence on the register does not encourage or ensure proponent social performance in the New England.

This submission focuses on practical ways to strengthen the Access Scheme so that it rewards developers who demonstrate leadership in community engagement, biodiversity stewardship, regional collaboration and long-term public value. By implementing these recommendations, the Access Scheme would support higher standards of renewable energy development across the New England REZ and, over time, across future Renewable Energy Zones in New South Wales.

Specifically, by including the assessment of community engagement, organisational capability and environmental stewardship alongside technical and commercial capability, it can help establish a new benchmark for renewable energy development in New South Wales.

CPA recommends that EnergyCo:

1. Recognise the Access Scheme as a mechanism for delivering public value, not simply allocating network capacity. Access Consent should encourage renewable energy projects that create lasting benefits for communities, biodiversity and regional economies alongside electricity generation.
2. Strengthen the assessment of community engagement and regional partnerships. Assessment should focus on the quality of relationships and the outcomes of engagement, rather than simply whether engagement activities have occurred.
3. Embed biodiversity stewardship as a defining feature of good renewable energy development. Access Consent should recognise proponents who demonstrate strategic site selection, landscape-scale stewardship and nature-positive outcomes.
4. Support coordinated regional benefit sharing. The Community and Employment Benefit Program should complement project-level benefit sharing and align investment with long-term regional priorities.
5. Support continuous improvement, improve transparency, accountability and post-consent enforcement Access Consent commitments should be measurable, transparent and supported by ongoing monitoring and enforcement to hold proponents accountable throughout project delivery and long-term operations.

Together, these recommendations would help ensure the New England REZ Access Scheme becomes more than a mechanism for managing access to transmission infrastructure. It can become an important policy tool for improving the quality of renewable energy development and strengthening community confidence in the energy transition.

About Community Power Agency

Community Power Agency is an independent not-for-profit organisation working to empower communities across Australia to participate in and benefit from a fairer and more accessible renewable energy system.

For more than a decade, CPA has worked with regional communities, governments, industry and civil society organisations to improve community engagement, benefit sharing, community ownership, regional collaboration and social outcomes associated with renewable energy development.

CPA has supported governments and communities across Renewable Energy Zones in New South Wales, Victoria, Queensland, Tasmania and Western Australia through policy development, strategic planning, community capacity building and regional benefit sharing. Our work also includes biodiversity integration, social licence, community governance and renewable energy policy.

Within the New England REZ, CPA has worked closely with local governments, Traditional Owners, community organisations, landholders, industry representatives and conservation organisations to strengthen regional participation in the energy transition. This includes facilitating the New England Biodiversity Reference Group, supporting development of the New England Conservation Investment Strategy, contributing to regional benefit sharing and workforce preparedness initiatives and developing practical approaches to balancing renewable energy development with biodiversity conservation and community aspirations.

This submission draws on that practical experience and focuses on CPA's areas of expertise:

- community engagement and participation
- regional benefit sharing
- biodiversity integration
- community governance and social licence
- regional collaboration
- Renewable Energy Zone policy and governance.

Overall position: From access management to regional stewardship

Historically, the environmental and regional development outcomes of renewable energy have relied largely on the individual practices of developers. Planning and environmental assessment processes establish important minimum requirements, but they provide relatively few opportunities to recognise and encourage developers that consistently demonstrate higher standards of practice.

The proposed Access Scheme begins to address this gap. By incorporating assessment criteria relating to organisational capability, community engagement and biodiversity, EnergyCo has recognised that successful renewable energy development requires trusted relationships, responsible stewardship and meaningful regional contribution. CPA strongly supports this direction.

To realise its full potential, however, the Access Scheme should move beyond confirming minimum compliance and instead create incentives for continuous improvement. Assessment criteria should be reframed to reward proponents that build trusted relationships with communities, deliver better biodiversity outcomes, collaborate across regions and contribute lasting public value alongside renewable energy generation.

In doing so, the New England REZ Access Scheme can create a race to the top - encouraging developers to compete not only on technical and commercial capability, but also on the quality of their engagement, environmental stewardship and contribution to regional Australia.

The following sections outline practical recommendations to help achieve that objective while maintaining the certainty and efficiency required for successful Renewable Energy Zone delivery.

Good renewable energy development

CPA considers that the Access Scheme should reward renewable energy projects that:

✓ Build trusted relationships with communities.
✓ Strengthen nature through biodiversity stewardship and landscape-scale planning.
✓ Leave regions better off through coordinated benefit sharing and regional collaboration.
✓ Remain accountable through transparent commitments and continuous improvement.

The following sections explain how the Access Scheme can better support each of these outcomes.

1. Good renewable energy development builds trusted relationships

CPA strongly supports the inclusion of community engagement within the proposed Access Consent framework. This recognises an important principle: proponents seeking access to publicly coordinated Renewable Energy Zone infrastructure should demonstrate not only technical capability, but also the ability to build trusted, long-term relationships with the communities that host renewable energy development. This represents an important evolution in renewable energy policy.

Historically, community engagement has been addressed primarily through planning and environmental assessment processes. While these processes establish important regulatory requirements, they typically occur after many of the fundamental decisions about project location, design and investment have already been made. They are also designed to assess whether statutory obligations have been met, rather than to recognise and encourage leading practice.

By incorporating community engagement into Access Consent, EnergyCo has created an opportunity to shift this approach. Rather than viewing engagement

solely as a compliance requirement, the Access Scheme can recognise it as a core capability of responsible project development and encourage higher standards across the renewable energy sector. CPA strongly supports this direction.

However, to realise its full potential, the assessment framework should focus less on *whether engagement activities have occurred* and more on **whether proponents have demonstrated the capability to build trust, respond to community concerns and contribute positively to the regions in which they operate.**

Assess relationships, not just engagement activities

The draft Access Consent Assessment Criteria appropriately recognise the importance of community engagement and place emphasis on organisational capability, including participation in the Commonwealth Developer Rating Scheme. While independent assessment of developer capability has clear value, organisational systems and ratings alone cannot fully capture the quality of relationships that proponents establish within particular communities.

Communities experience renewable energy projects locally. Trust is built through respectful relationships with landholders, neighbours, Traditional Owners, local government, community organisations and regional institutions. Equally, trust can be undermined where engagement is inconsistent, delayed or perceived to be undertaken primarily to satisfy regulatory requirements.

For this reason, CPA recommends that Access Consent assess not only whether proponents have appropriate engagement processes, but **whether they have demonstrated behaviours that are likely to build and maintain the confidence of communities in the New England over the life of a project.** This distinction is important because effective engagement is not measured by the number of meetings held or newsletters distributed. Rather, it is demonstrated by whether engagement has influenced project design, responded to local knowledge, addressed community concerns and established ongoing mechanisms for dialogue.

An **outcomes-focused approach** would encourage proponents to invest in genuine relationship-building rather than procedural compliance.

Recognise the value of early engagement

One of the strongest predictors of successful renewable energy development is the quality of engagement undertaken during the earliest stages of project planning. By the time many projects enter formal planning processes, decisions regarding site selection, project layout and associated infrastructure have often been substantially progressed. Opportunities for communities to influence fundamental aspects of project design may therefore be limited.

Best practice engagement begins much earlier. Early engagement enables proponents to understand local aspirations, identify potential risks, incorporate community knowledge into project design and avoid unnecessary impacts before key investment decisions have been made. It also allows communities to participate in shaping projects rather than simply responding to proposals that are already largely fixed. This is particularly important within Renewable Energy Zones, where multiple projects may be progressing simultaneously and cumulative impacts become increasingly significant. Early dialogue creates opportunities to coordinate infrastructure, identify shared priorities and build stronger regional relationships before issues become sources of conflict.

CPA recommends that Access Consent **explicitly recognise early engagement as a characteristic of good renewable energy development. Assessment should consider not only when engagement commenced, but also how community feedback has informed project planning and decision-making.**

Encourage collaboration across the region

Renewable Energy Zones are, by design, collaborative undertakings. Multiple proponents operate within shared landscapes, rely on common infrastructure and collectively influence community confidence in the energy transition. For this reason, community engagement should not be viewed solely as an individual project responsibility.

CPA encourages EnergyCo to r**ecognise proponents that work collaboratively with neighbouring developers, local government, Traditional Owners, community organisations and regional institutions to address shared opportunities and challenges**. Examples include coordinating engagement activities, supporting

regional workforce initiatives, collaborating on housing and infrastructure planning, partnering with local organisations or contributing to shared regional priorities.

These forms of collaboration reduce duplication, improve efficiency, reduce engagement fatigue, and help build confidence that renewable energy development is being delivered in the long-term interests of the region rather than through isolated projects operating independently of one another.

Explicitly recognising collaborative approaches through Access Consent would reinforce the principle that developers are contributing to the success of the Renewable Energy Zone as a whole, not simply their individual projects.

Community perspectives can strengthen assessment

CPA also recommends that EnergyCo **consider opportunities for community perspectives to inform Access Consent assessment**. The current framework appropriately relies on evidence provided by proponents and independent assessment processes. However, local councils, Traditional Owners, Local Aboriginal Land Councils, community organisations and other regional stakeholders often have valuable insights into how proponents engage within particular communities.

CPA is not suggesting that Access Consent become another public consultation process or a mechanism for revisiting planning decisions. Rather, regional perspectives can provide useful context regarding whether proponents have demonstrated respectful conduct, responded constructively to local issues and established productive working relationships.

Incorporating appropriate regional perspectives would strengthen confidence that Access Consent reflects demonstrated performance as well as organisational capability.

Recommendations

CPA recommends that EnergyCo strengthen the community engagement components of the Access Scheme by:

- Assessing the quality and outcomes of community engagement, rather than simply confirming that engagement activities have occurred.

- Recognising early engagement during project identification and feasibility as a characteristic of good renewable energy development.
- Requiring proponents to demonstrate how community feedback has influenced project design and decision-making.
- Encouraging collaboration with local government, Traditional Owners, community organisations and neighbouring proponents to address shared regional opportunities.
- Considering appropriate regional perspectives to inform assessment of demonstrated engagement capability.
- Supporting ongoing engagement and transparent reporting throughout project construction and operation.

Strong community relationships are fundamental to successful Renewable Energy Zones. By focusing on trust, responsiveness and collaboration, the Access Scheme can encourage more consistent engagement practices across the sector and strengthen community confidence in the renewable energy transition.

2. Good renewable energy development strengthens nature

CPA welcomes the inclusion of biodiversity within the proposed Access Consent Assessment Criteria. This recognises that successful renewable energy development depends not only on reducing emissions, but also on protecting and enhancing the natural environments in which projects are located.

Climate change and biodiversity loss are two of Australia's most significant environmental challenges. Renewable Energy Zones are being established to accelerate the transition to clean energy and address the first challenge. The Access Scheme provides an opportunity to ensure that this transition also contributes positively to the second.

Strong biodiversity outcomes are not only important for environmental reasons. They also influence community confidence in renewable energy development. CPA's experience working with regional communities consistently demonstrates that local support is strengthened when proponents are seen to respect the landscapes in which they operate and actively contribute to environmental stewardship. Projects that avoid sensitive environments where possible, restore degraded areas and work

collaboratively with conservation organisations often build stronger relationships with communities than those that approach biodiversity solely as a regulatory requirement.

Historically, biodiversity has been addressed primarily through project-specific environmental assessment processes. These processes play a critical role in identifying impacts and ensuring compliance with environmental legislation. However, they are not designed to encourage leadership in biodiversity stewardship or recognise proponents who seek to deliver positive environmental outcomes beyond minimum regulatory requirements.

The Access Scheme provides an important opportunity to address this gap by recognising biodiversity stewardship as an indicator of responsible project development. Doing so sends an important signal that protecting nature is not separate from the energy transition, it is an essential part of delivering it well.

Rather than assessing biodiversity solely as a project constraint, the Access Scheme can **encourage proponents to demonstrate how biodiversity has informed project planning, influenced design decisions and contributed to better long-term outcomes for regional landscapes**. In doing so, the Access Scheme can complement existing planning and environmental approval processes by creating incentives for leading practice rather than simply confirming compliance.

Reward biodiversity stewardship, not simply biodiversity assessment

The draft assessment criteria appropriately require proponents to identify biodiversity values that may be affected by a project. This provides an important foundation by ensuring environmental considerations are incorporated into project planning from an early stage. However, understanding biodiversity values is only the beginning.

CPA recommends that Access Consent place greater emphasis on **how proponents respond to biodiversity information and the extent to which it influences project design**. For example, proponents should be encouraged to demonstrate that biodiversity considerations have informed:

- site selection;
- project layout;

- transmission corridor planning;
- infrastructure placement;
- construction planning; and
- long-term land management.

Projects that avoid high-value environmental areas, retain important habitat, maintain ecological connectivity or redesign infrastructure to reduce environmental impacts should be recognised through the Access Scheme. This shifts biodiversity from being viewed primarily as a development constraint to becoming an important design consideration that supports better project outcomes.

Encourage nature-positive renewable energy development

Across Australia there is growing recognition that renewable energy development should aim to be nature positive wherever possible. Nature-positive development goes beyond avoiding environmental harm. It seeks to improve the health and resilience of ecosystems over time through restoration, improved land management and strategic investment.

CPA believes the Access Scheme provides an opportunity to encourage this approach. Rather than recognising only compliance with environmental obligations, Access Consent should also **acknowledge proponents who demonstrate leadership in biodiversity stewardship** through initiatives, such as:

- restoring degraded native vegetation;
- improving habitat connectivity across agricultural landscapes;
- supporting long-term ecological monitoring;
- managing invasive species in partnership with neighbouring landholders;
- integrating biodiversity objectives into operational land management;
- partnering with conservation organisations to deliver restoration projects; and
- supporting research and innovation that improves biodiversity outcomes associated with renewable energy development.

These initiatives are increasingly being adopted by leading developers across Australia. The Access Scheme can help encourage broader uptake by recognising environmental leadership as a characteristic of good renewable energy development.

Recognise landscape-scale outcomes

Renewable Energy Zones differ from traditional project-by-project development because they concentrate multiple renewable energy projects within the same regional landscape. This creates opportunities and responsibilities that extend beyond individual project boundaries.

Communities and ecosystems experience the cumulative effects of multiple developments rather than individual projects in isolation. Habitat fragmentation, ecological connectivity, weed management, fire management and landscape restoration are all issues that benefit from coordinated regional approaches.

CPA recognises that cumulative environmental assessment is addressed through existing planning and environmental legislation. The Access Scheme should not duplicate these processes. However, it can **encourage proponents to demonstrate that they understand the broader landscape in which their projects operate and are willing to contribute to collaborative regional solutions**. For example, proponents could demonstrate how they have:

- considered neighbouring renewable energy developments;
- coordinated biodiversity management across adjoining properties;
- contributed to regional restoration initiatives;
- collaborated on ecological monitoring;
- shared environmental information where appropriate; or
- participated in regional biodiversity partnerships.

Recognising these activities would reinforce the principle that Renewable Energy Zones should be planned and managed as integrated landscapes rather than collections of individual projects.

Align biodiversity investment with regional priorities

One of the greatest opportunities presented by the Access Scheme is to encourage biodiversity investment that contributes to long-term regional conservation objectives. Across the New England region, governments, Traditional Owners, landholders, conservation organisations and community groups are already working together to identify strategic opportunities for conservation and ecological restoration.

Where proponents choose to invest in biodiversity enhancement, those investments should, wherever practical, align with these broader regional priorities. Strategic alignment improves ecological outcomes by directing investment towards areas of greatest need, reduces duplication between projects and helps build long-term partnerships between renewable energy developers and regional organisations with expertise in land management and conservation. Importantly, it also strengthens community confidence that biodiversity investment is delivering genuine public value rather than fragmented, project-specific initiatives.

Recommendations

CPA recommends that EnergyCo strengthen the biodiversity components of the Access Scheme by:

- Assessing how biodiversity considerations have influenced project design, not simply whether biodiversity values have been identified.
- Recognising proponents that demonstrate nature-positive approaches through restoration, habitat enhancement and long-term environmental stewardship.
- Encouraging landscape-scale collaboration between proponents, Traditional Owners, conservation organisations and regional land managers.
- Supporting biodiversity initiatives that align with regional conservation priorities and strategic restoration programs.
- Recognising biodiversity stewardship as an indicator of high-quality renewable energy development and long-term regional leadership.

The Access Scheme has the potential to establish a new benchmark for integrating renewable energy development with biodiversity stewardship. By encouraging projects that strengthen, rather than simply minimise impacts on, the landscapes in which they operate, EnergyCo can help demonstrate that climate action and nature conservation are complementary objectives that together underpin a successful energy transition.

3. Good renewable energy development leaves regions better off

Renewable Energy Zones are designed to coordinate renewable energy development at a regional scale. While individual projects generate their own impacts and benefits, many of the opportunities created by the energy transition - including workforce development, infrastructure investment, economic diversification and community resilience - are regional in nature.

CPA therefore welcomes the inclusion of the Community and Employment Benefit Program within the New England REZ Access Scheme. The program recognises an important principle: access to publicly coordinated Renewable Energy Zone infrastructure should contribute not only to electricity generation, but also to the long-term wellbeing of the regions that host it. CPA strongly supports this direction.

However, to maximise its impact, the Community and Employment Benefit Program should complement - not replace - project-level community benefit sharing. It should focus on opportunities that are most effectively delivered through coordinated regional investment.

Support regional initiatives and collaboration

Historically, community benefit sharing has largely been delivered on a project-by-project basis. This approach has generated valuable local outcomes. However, it can also result in fragmented investment, duplication of effort and competition between neighbouring communities for funding and support.

Because Renewable Energy Zones bring together multiple proponents operating within shared landscapes, they create an opportunity to think differently. Because multiple projects are being developed within the same region, proponents can work together to support priorities that extend beyond the boundaries of individual developments, and find opportunities for collaboration that rarely exist under traditional project-by-project development.

CPA encourages EnergyCo to **recognise proponents that actively contribute to regional partnerships and collaborative initiatives that are often beyond the capacity of individual projects but become achievable when approached**

collectively. Collaboration enables proponents to pool resources, coordinate investment and respond more effectively to regional challenges than any individual project could achieve alone.

This might include working with local government; Traditional Owners; regional development organisations; education and training providers; community organisations; neighbouring proponents; and local businesses on regional initiatives such as:

- regional workforce and skills development;
- housing and accommodation initiatives;
- shared community infrastructure;
- regional transport improvements;
- strategic economic development;
- coordinated community resilience programs; and
- long-term investment in local institutions and services.

Recognising collaboration through Access Consent would reinforce the principle that developers are contributing to the success of the Renewable Energy Zone as a whole, not simply delivering individual projects.

Furthermore, the Community and Employment Benefit Program provides an opportunity to support initiatives aimed at delivering regional capability outcomes.

Align investment with community priorities

Benefit sharing is most effective when it responds to priorities identified by communities themselves. Across the New England region, local government, community organisations, Traditional Owners and regional institutions have invested significant time in identifying long-term aspirations for economic development, community wellbeing and regional resilience.

CPA recommends that **Community and Employment Benefit Program investments be guided by these existing regional priorities wherever possible.** Doing so would improve coordination, reduce duplication and help ensure that funding contributes to outcomes that communities have already identified as important. It would also strengthen confidence that benefit sharing is being delivered strategically rather than through ad hoc funding decisions.

Focus on lasting regional capacity

CPA believes that the greatest legacy of Renewable Energy Zones will not be measured solely by the electricity they generate. It will also be measured by whether regional communities emerge from the energy transition stronger, more resilient and better equipped for future economic opportunities. For this reason, the Community and Employment Benefit Program should prioritise investments that build long-term regional capability. Examples include:

- developing local skills and employment pathways;
- strengthening regional institutions;
- supporting community-led planning;
- improving social infrastructure;
- investing in regional leadership; and
- building the capacity of communities to participate in future renewable energy opportunities.

These types of investments continue delivering value long after individual renewable energy projects have been constructed.

Transparency builds trust

Regional benefit sharing is most effective when communities understand how priorities are identified, how funding decisions are made and what outcomes are being achieved.

CPA therefore encourages EnergyCo to ensure that **Community and Employment Benefit Program investments are transparent, measurable and regularly reported.** Clear reporting will help demonstrate the value created through the program, strengthen community confidence and support continuous improvement as Renewable Energy Zones mature across New South Wales. Transparency also enables successful approaches to be shared across regions, creating opportunities for learning and innovation throughout the Renewable Energy Zone program.

Recommendations

CPA recommends that EnergyCo strengthen the Community and Employment Benefit Program by:

- Positioning the program as a complement to, rather than a replacement for, project-level community benefit sharing.
- Prioritising investments that address regional opportunities and challenges that individual projects cannot deliver alone.
- Aligning funding with long-term regional priorities identified through community-led planning and collaboration.
- Recognising proponents that actively participate in regional partnerships and collaborative initiatives.
- Supporting investments that build enduring regional capability, resilience and economic opportunity.
- Ensuring transparent governance, measurable outcomes and public reporting to support accountability and continuous improvement.

The Community and Employment Benefit Program has the potential to become one of the defining features of the New England REZ Access Scheme. By encouraging coordinated regional investment alongside project-level benefit sharing, the Scheme can help ensure that Renewable Energy Zones leave a lasting legacy of stronger communities, more resilient regional economies and greater public confidence in the energy transition.

4. Good renewable energy development is transparent, accountable and continually improving

The New England REZ Access Scheme has the potential to influence renewable energy development well beyond the point at which Access Consent is granted. If the Scheme is to encourage higher standards across the sector, proponents should remain accountable for the commitments that underpin their Access Consent. This includes commitments relating to community engagement, biodiversity stewardship and regional benefit.

CPA therefore encourages EnergyCo to view Access Consent not simply as an assessment process, but as part of a broader framework for continuous improvement.

Make commitments measurable

The draft Access Scheme appropriately encourages proponents to demonstrate organisational capability and good development practices. However, the value of these commitments will depend on whether they can be understood, monitored and, where appropriate, reported over time.

CPA recommends that commitments made through the Access Consent process **be framed in ways that are measurable and capable of being assessed throughout project delivery.** This does not require complex reporting frameworks. Rather, proponents should be able to demonstrate how they are delivering on the commitments that supported their application for Access Consent and explain where approaches have evolved in response to changing circumstances or community feedback. Clear expectations also provide greater certainty for proponents by establishing a consistent understanding of what good practice looks like.

Ensure commitments have legal and operational "teeth"

To ensure that Access Consent drives enduring public value, commitments made during the assessment process must be enforceable over the multi-decade lifecycle of a project. Monitoring performance is essential, but EnergyCo also requires a clear, legally defensible framework of post-consent levers to respond when a proponent defaults on social, environmental, or benefit-sharing commitments.

CPA recommends that EnergyCo **embed a graduated enforcement protocol into the Access Scheme Declaration and project-level Standard Development Agreements.** Enforcement should focus on remediation first, escalating to financial and operational consequences for persistent default.

Support learning across Renewable Energy Zones

The New England REZ is the first Renewable Energy Zone to implement the proposed Access Scheme. As the framework matures, EnergyCo will have an opportunity to identify successful approaches, share lessons across regions and continuously improve the assessment process.

CPA encourages EnergyCo to view this as an iterative policy framework. **Monitoring outcomes over time will help identify which assessment criteria are most effective at encouraging better community engagement, stronger biodiversity outcomes and more strategic regional collaboration.**

Sharing this knowledge across future Renewable Energy Zones would help establish increasingly consistent expectations for renewable energy development across New South Wales.

Reward leadership

One of the greatest strengths of the Access Scheme is its ability to recognise developers that consistently demonstrate leadership. Planning and environmental approvals establish minimum standards that all proponents must satisfy. Access Consent creates an opportunity to encourage something different: continuous improvement.

Developers that build trusted relationships, strengthen biodiversity outcomes, collaborate with regional partners and deliver lasting public value should be recognised for doing so. Over time, this creates an incentive for proponents to compete not only on technical capability and commercial performance, but also on the quality of their contribution to regional communities and landscapes.

Recommendations

CPA recommends that EnergyCo strengthen the Access Scheme by:

- Ensuring commitments made through Access Consent are clear, measurable and capable of being monitored throughout project delivery.
- Supporting transparent reporting that demonstrates how proponents are delivering on their commitments and responding to changing circumstances.
- Developing a clear, legally defensible framework of post-consent levers to respond when a proponent defaults on social, environmental, or benefit-sharing commitments.
- Using experience from the New England REZ to continually improve the Access Scheme and inform future Renewable Energy Zones.

- Recognising developers that demonstrate leadership in community engagement, biodiversity stewardship and regional collaboration as part of an ongoing culture of continuous improvement.

By embedding accountability and learning within the Access Scheme, EnergyCo can encourage consistently higher standards of renewable energy development while building confidence among industry, government and regional communities.

Conclusion

Community Power Agency supports the introduction of the New England Renewable Energy Zone Access Scheme and commends EnergyCo for recognising that renewable energy development is about more than connecting infrastructure to the electricity network.

By introducing Access Consent, EnergyCo has created an important opportunity to establish consistent expectations for how projects engage with communities, manage environmental values and contribute to the regions that host them.

CPA encourages EnergyCo to build on this foundation by rewarding proponents that demonstrate leadership in community engagement, biodiversity stewardship, regional collaboration and long-term public value. Access to publicly coordinated REZ infrastructure should be accompanied by clear expectations about how projects contribute to the places in which they operate.

Done well, the Access Scheme can create a race to the top. Developers would compete not only on technical capability and commercial performance, but also on the quality of their relationships with communities, their stewardship of biodiversity and their contribution to regional prosperity.

In doing so, the New England REZ Access Scheme can become more than a mechanism for allocating access to transmission infrastructure. It can establish a new benchmark for renewable energy development in New South Wales - rewarding projects that build trusted relationships, strengthen nature and leave regions better off. That would leave a lasting legacy of stronger communities, healthier landscapes and more resilient regional economies.

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