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## **NSW Strategic Planning**

AGL Energy (**AGL**) welcomes the opportunity to provide feedback to the *A New Approach to Strategic Planning Discussion Paper (Discussion Paper)*.

As a major energy provider with longstanding operations across the Hunter and broader regional NSW, we recognise the importance of a strategic planning framework that is clear, evidence-based and capable of supporting both current economic realities and future transitions.

AGL owns and operates a diverse portfolio of generation and firming assets across NSW, including coal-fired generation, hydroelectric facilities, and emerging firming technologies such as grid scale batteries. Collectively, this portfolio forms a critical component of NSW's electricity system reliability, supporting legacy baseload needs while enabling the shift toward flexible, low emissions and dispatchable capacity.

In the Hunter region, AGL operates the 2715 MW Bayswater Power Station and will soon operate the 500 MW Liddell Battery (with commencement of operations targeted for May 2026<sup>1</sup>). Following the closure of the Liddell Power Station in April 2023, AGL has commenced the transition of the site into an integrated energy hub, with preliminary demolition work commencing in early 2025, and our intention to recycle over 90% of Liddell's materials in the decommissioning and demolition process.

In the years ahead, AGL will transform the combined Liddell and Bayswater site into its first integrated energy hub – the Hunter Hub. Repurposing existing assets and infrastructure including land, water, transport links and grid connectivity, the Hunter Hub will bring together co-located industries that can make a positive contribution to the energy transition and create economic opportunities for the local community.

While AGL supports the intent to modernise NSW's strategic planning system, we believe more recognition is needed for the diversity of regional NSW and the unique challenges facing transitioning energy regions.

## **Regional Planning Boundaries – Retain the Hunter as a Single Region**

AGL appreciates the NSW Government's consideration of how best to structure regional planning boundaries as part of the broader strategic planning reforms. In this context, we encourage careful consideration of any proposal to consolidate the existing regional plans into a single regional NSW plan or to separate the Upper Hunter from the Lower Hunter.

The Hunter functions as an interconnected economic, environmental and infrastructure system. Key industries—including energy generation, mining, freight and logistics, water management, workforce mobility and emerging renewable energy sectors—function across the region as an integrated system. Adjusting planning boundaries risks creating misalignment between these interdependent systems.

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<sup>1</sup> <https://www.agl.com.au/about-agl/operations/liddell-battery?cidi=AGL%7CB1001983>



From AGL's perspective, dividing the Hunter region could present challenges such as:

- reducing alignment in planning for energy transition across the region,
- separating interconnected labour and housing markets,
- increasing complexity in infrastructure coordination, and
- limiting the ability to take a unified, strategic approach to supporting the Hunter's long-term economic transformation.

To support cohesive regional outcomes, AGL suggests that retaining a single Hunter Regional Plan may offer the greatest benefits—ensuring planning approaches reflect the region's unique economic structure, transition trajectory and community priorities.

### **Implementation and Workload Implications**

While simplification is a worthwhile objective, AGL suggests that careful consideration should be given to the practical implications of developing a single regional NSW plan that covers 84 local government areas (LGA). A single plan may:

- be too broad to provide the detailed guidance needed to support local decision making,
- unintentionally increase the workload for councils and agencies as they interpret the plan for diverse regional contexts, and
- create uncertainty for industry seeking clear, region-specific guidance to inform long-term investment.

A potentially more effective approach could be to refine, update and strengthen the existing regional plans, ensuring they remain responsive to local conditions while still aligning with state-wide strategic priorities.

### **Energy Transition and Economic Diversification**

As NSW moves toward a lower emissions future, strategic planning frameworks will play a central role in guiding how regions adapt and evolve. In this context, planning frameworks must:

- support the effective repurposing of existing energy sites,
- enable timely delivery of transmission and renewable energy infrastructure,
- provide clear and stable investment signals for investment in emerging industries, and
- ensure communities affected by coal closure are supported through coordinated land use, economic and infrastructure planning.

While the Discussion Paper acknowledges “emerging economic opportunities”, further consideration of the work already underway around the energy transition would be beneficial —particularly in the Hunter and other regions experiencing significant structural change. Enhanced recognition of these dynamics would help ensure planning frameworks remain responsive, equitable and aligned with NSW's long-term transition objectives.

AGL supports the ambition to modernise strategic planning in NSW and looks forward to further consideration of the issues raised in this submission. A strategic planning system that recognises the diversity of regional NSW—and the unique challenges facing transitioning energy regions—will be essential to delivering sustainable, resilient and prosperous outcomes for communities and industry.

Should you have any questions in relation to this submission, please contact Jane Callinan (Engagement Manager) at [jcallinan@agl.com.au](mailto:jcallinan@agl.com.au).

Yours sincerely,

**AGL Energy**



## About AGL

At AGL, we believe energy makes life better and are passionate about powering Australian life. Proudly Australian since 1837, AGL delivers around 4.6 million<sup>2</sup> gas, electricity, and telecommunications services to our residential, small and large business, and wholesale customers across Australia. AGL operates Australia's largest private electricity generation portfolio within the National Electricity Market, comprising coal and gas-fired generation, renewable energy sources such as wind and hydro, and batteries and other firming and storage technology. We are building on our history as one of Australia's leading private investors in renewable energy to be a leader in the transition to a lower emissions and smart energy future in line with the goals of our Climate Transition Action Plan. We'll continue to innovate in energy and other services to enhance the way Australians live, move and work.

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<sup>2</sup> Refer to AGL's [ESG Data Centre FY25](#)