

Submission  
No 23

**INQUIRY INTO FEASIBILITY OF UNDERGROUNDING  
THE TRANSMISSION INFRASTRUCTURE FOR  
RENEWABLE ENERGY PROJECTS**

**Name:** Mrs Sally Edwards

**Date Received:** 9 November 2023

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# Central-West Orana REZ Transmission

I **OBJECT** whole-heartedly to the CWO REZ Transmission project and more importantly to the industrialised model of Renewable Energy Zones. The declaration of the Central West Orana REZ and the associated Transmission Project (SSI-48323210) are not in accordance with relevant Legislation.

SSI-48323210  
**OBJECTION SUBMISSION**  
NOVEMBER 2023

## RELEVANT LEGISLATION

### **Environmental Planning and Assessment Act 1979 (EP&A Act)**

Division 2.6 Community participation  
Division 5.2 State significant infrastructure

**Functions:** 1. State Significant Infrastructure Guidelines Oct 22  
2. Undertaking Engagement Guidelines for State Significant Projects Oct 22

### **Electricity Infrastructure Investment Act 2020**

Part 4 Renewable energy zones and access schemes

### **Environment Protection and Biodiversity Conservation Act 1999**

## Case for Change – The Transmission Line Project, the “Spine” of the CWO REZ

Sally Edwards, Warrumbungle  
Region NSW

The cumulative and residual Social, Environmental and Economical impacts are simply TOO great. They are a cost we should not force future generations to bear. It is our generational responsibility to act in a considered and balanced way in regard to all developments with such substantial cumulative and residual losses and costs. The Renewable Energy Zone (REZ) model and the Rapid Transition to Renewable Energy (RE) are driven ultimately by global corporate investors. The very fact that the EnergyCo "Registration of Interest" invitation was extended to RE developers and **NOT** to Local Government Regions, Towns and Communities and then used to identify and declare REZ locations is evidence of this. Some would view this as a conflict of interest. This RE Transition is not about saving our environment & securing the future of Australia, if it was, we would be spending the time needed to get it "right".





# Personal Background

## Relevant Experience

## Sally Edwards

### Current Roles:

#### 2022 –

Volunteer  
Community Representative -  
Warrumbungle Region  
EnergyCo CWO REZ Community  
Reference Group (CRG)  
*30 endorsements from the Warrumbungle Region*

#### 2018 –

Contract  
Community Development Coordinator  
Binnaway Progress Association

#### 2012 –

Volunteer  
Treasurer/Committee Member  
Coolah Youth & Community Centre

### Previous Roles:

#### 2019 - 2021

Volunteer & Contract Facilitator  
Building Our Warrumbungle Communities  
(Asset-based Community Development)

#### 2016 - 2021

Business Owner/Manager  
Coolah Garden Café & Pantry

#### 2013 – 2022

Contract  
Community Development Coordinator  
Coolah District Development Group

#### 2010 – 2012

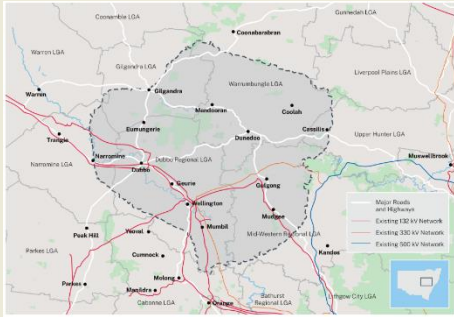
Volunteer  
Event Coordinator  
Future Beef Breeders Youth Camp



The Central-West, and the Warrumbungle Region matter to me. The future of Regional NSW and Rural Australia – the food and fibre producing areas of our country are important not only to me, but to every Australian. I care about the future of our land and water, the animals and their habitats, our communities - and the families that call it home.

Over the past 10 years, I have been actively seeking to understand and gain knowledge about the state significant developments and infrastructure projects - the CWO REZ, proposed for the Central-West. I volunteered as a Community Representative on the CWO REZ Community Reference Group in 2022.

It is my belief and my professional opinion, that the costs of development using the REZ model for the future of Australia's Energy Generation are too high, they are destructive. Our regions, our rural communities will pay the ultimate price, that future generations of Australian's will look back on in bewilderment and with shaking heads. It is my priority to help sustain rural communities, to maintain their unique character and identities, and to maintain and grow community connection. Can we energise our country without decimating our landscapes, our small rural communities, and regional areas in the process?



# Division 2.6 Community Participation

CWO REZ PROPOSAL & DELIVERY  
**NOT IN ACCORDANCE WITH EP&A Act**

**Inform → Consult → Involve → Collaborate → Empower?**

**Total regional social locality population in CWO REZ (Table 13-4 EIS Main Report) = 152,418**

Total Central-West Orana Region population = >290,000

The CWO REZ Communities have NOT actively participated in the declaration decision of the CWO REZ. I recall those in our local region found out about the “Renewable Energy Zone” (REZ) when Transgrid held a “Community Consultation” session in Cassilis, from there Local Government went searching for information and answers, and so did community. From the very beginning, the information relating to the CWO REZ has not been provided to the public in a balanced and objective way. The public have not been adequately or transparently **informed**.

I volunteered to apply to sit on the CWO REZ Community Reference Group in an attempt to ensure that the concerns and aspirations of community members were understood and actively considered. Most of the concerns I have raised have not resulted in change to the way the project is delivered or even in alternatives being considered. Most of the concerns and issues raised have resulted in being further “informed” and at times with little to no transparency.

## IAP2 Spectrum of Public Participation



IAP2's Spectrum of Public Participation was designed to assist with the selection of the level of participation that defines the public's role in any public participation process. The Spectrum is used internationally, and it is found in public participation plans around the world.

		INCREASING IMPACT ON THE DECISION				
		INFORM	CONSULT	INVOLVE	COLLABORATE	EMPOWER
PUBLIC PARTICIPATION GOAL		To provide the public with balanced and objective information to assist them in understanding the problem, alternatives, opportunities and/or solutions.	To obtain public feedback on analysis, alternatives and/or decisions.	To work directly with the public throughout the process to ensure that public concerns and aspirations are consistently understood and considered.	To partner with the public in each aspect of the decision including the development of alternatives and the identification of the preferred solution.	To place final decision making in the hands of the public.
	PROMISE TO THE PUBLIC	We will keep you informed.	We will keep you informed, listen to and acknowledge concerns and aspirations, and provide feedback on how public input influenced the decision.	We will work with you to ensure that your concerns and aspirations are directly reflected in the alternatives developed and provide feedback on how public input influenced the decision.	We will look to you for advice and innovation in formulating solutions and incorporate your advice and recommendations into the decisions to the maximum extent possible.	We will implement what you decide.

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EIS Main Report 5-1, 5.1.1 Engagement Approach references broad alignment with the Quality Assurance Standard for Community & Stakeholder Engagement (International Association for Public Participation (IAP2) 2015)

At no time have I witnessed the Public being invited to **Collaborate** in any aspect of a decision, including the development of alternatives and the identification of a preferred solution.

The CWO REZ project and the Transmission Line Project may have a narrow alignment i.e having informed and consulted with some low level of reach, with the “Quality Assurance Standard for Community & Stakeholder Engagement (International Association for Public Participation (IAP2) 2015)” but by no means could soundly demonstrate a broad alignment with such a quality assurance standard.

The level of participation in numbers, in relation to the CWO REZ Population is inadequate for the significant impacts faced by the CWO REZ communities.



**Demonstration of Levels of Participation**

Organiser	Activity	Method	IAP2 Level (See # Key)	Number of Participants	Target Population	% of Target Population	% of the REZ Participation
Energy Co (Ref EIS 5-7 Pg 194)	Letter to Landowners	Letter	Inform	350	350	100%	0%
Energy Co (Ref EIS 5-7 Pg 194)	Info Sessions	6x Drop-In Sessions	Consult	130	152,418	0%	0%
Energy Co (Ref EIS 5-8 Pg 195)	Newsletter	E-Newsletter	Inform	200	152,418	0%	0%
Energy Co (Ref EIS 5-8 Pg 195)	Newsletter	E-Newsletter	Inform	290	152,418	0%	0%
Energy Co (Ref EIS 5-8 Pg 195)	Info Sessions	7x Drop-In Sessions	Consult	143	152,418	0%	0%
Energy Co (No reference in EIS?)	Community Listening	Online Survey	Consult	55	152,418	0%	0%
Energy Co (Ref EIS 5-8 Pg 195)	Social Impact Assessment (SIA)	Interviews**	Consult	44	152,418	0%	0%
Sal Edwards - Community Representative	Coolah Community Survey	Online Survey	Consult	130	900	14%	0%
Energy Co (Ref EIS 5-9 Pg 196)	SIA - Landowners	Online Survey	Consult	104	80	130%	0%
Energy Co (Ref EIS 5-9 Pg 196)	Newsletter	E-Newsletter	Inform	450	152,418	0%	0%
Energy Co (Ref EIS 5-9 Pg 196)	Info Sessions - Wellington, Guligong, Coolah	Community Information Session	Consult	92	?	#VALUE!	0%
Energy Co (Ref EIS 5-13 Pg 200)	Community Benefits Survey	Online Survey	Consult	290	152,418	0%	0%

**# Key IAP2 Level**

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- Inform →
  - Consult →
  - Involve →
  - Collaborate →
  - Empower
- Includes Councils & Organisations

Table above - quantifying the levels of "participation." Demonstrates no activity to Involve, Collaborate or Empower (REZ Population figure obtained from Table 13-4 EIS Main Report)

**Note:** Coolah Community Survey results attached to support this Objection submission and support the reasoning made relating to community participation levels and overall community understanding.

**Overall Comments:**

1. The engagement activities demonstrated in the above table appear to be less than satisfactory when considering the nature of the project ie. Critical State Significant Infrastructure, the population directly impacted (REZ Area) and the total number of population engaged in consultation. **This data demonstrates a sum total zero % participation.** I acknowledge that this EIS is for the Transmission Line project, what will become the "spine" of the CWO REZ, but given that there is EIS content relevant to the whole of REZ (20 - Cumulative Impacts) and as this is the first formal opportunity for submission, I am including my thoughts here. However, I am of the firm belief that the CWO REZ Project in its entirety should have undergone its own feasibility and Cost Benefit Analysis and project planning process and I do understand this would have challenged the current planning system model. This, in itself is evidence enough that this transition using the REZ Model is a rushed execution that has not undergone extensive investigation and scrutiny and development of the framework and associated legislation to successfully and ethically deliver such a scale of REZ projects across the State, that each encompass many CSSI and SSD projects simultaneously.

2. The *Community Participation Plan (DPIE2019b)* is also listed as a guiding document for the Community Engagement Approach (EIS 5.1.1). While there are general suggestions that are relevant, this document doesn't adequately cater for a project such as the entire REZ. The potential cumulative and residual impacts identified for the REZ are significant and of a magnitude not previously considered at the time of this document's creation or that of the relevant legislation. The REZ Model, undergoes **no project approval** in its entirety, yet relies solely on the States Planning Approval process for the individual SSD and CSSI projects. At NO time has there been any community participation, conversation or effective collaboration for planning a successful delivery of the entire REZ with those local to the CWO REZ project. This **does not align** with the demonstrated commitment, recorded as The Department's commitment to community participation (Community Participation Plan Pg 8) as **"utilising local knowledge and expertise"** and **"which empowers local communities in the planning process"**.

3. The data displayed above and as displayed in the EIS clearly demonstrates that it is more in "extremely narrow" alignment with the *Quality Assurance Standard for Community & Stakeholder Engagement (International Association for Public Participation (IAP2) 2015)*.

4. Interpretation of this data could and should demonstrate that while the community have been "somewhat" informed and consulted (although when quantifying the measure of these activities it could be interpreted that while the activities have been conducted, there has been a zero % participation level to adequately inform or consult the REZ community population), there has been NO

attempt to involve, collaborate or empower the public in the planning and delivery of the CWO REZ.

5. One example of excluding the involvement of the public, is the lack of a collaborative development of a whole of REZ Temporary Workforce Accommodation strategy in collaboration with the public. If there has been a strategy developed, it was without the public's involvement and is not currently a publicly available document. If it hasn't been developed yet – why not? Proponents are already consulting community on TWA locations AND this has occurred through the Transmission Line Project EIS Exhibition period, which is also demonstrating an extreme lack of whole of REZ coordination on the ground. This is but ONE example of many decisions made for the REZ wide project delivery to not involve or collaborate with the public.

6. The Social Impact Assessment engagement was a targeted approach. As an active Member of the Community Reference Group, why weren't the CRG Members invited to participate? I conclude that NO MEASURES were put in place to ensure that substantial or even adequate participation were achieved through Social Impact Engagement. 28 Individuals, 3 Councils, 11 Organisations and 2 public services were interviewed. Total of 44. See *EIS Technical Paper 7, 3.4.2.1 Interviews To me*, for a CSSI project and for the first REZ, which encompasses MANY SSD projects all developing simultaneously within a declared area, this approach and associated outcomes for Social Impact Assessment are inadequate.

7. The resulting outcomes from questions posed and community feedback provided through the CRG forum have been limited and not of considerable value to the community. I question the overall effectiveness of the forum, considering the quantity of volunteer time spent actively representing community through discussions, detailing and posing questions through email correspondence, attending CRG Meetings and in reflecting on the overall value and transparency of information given to community in return.

8. At the most recent meeting of the CRG, discussion was limited to the EIS and the broader REZ topics such as the Community Benefit Fund and the formation and Terms of Reference of the SteerCo were verbally requested to be "off the table". These broader issues were of particular importance to community at the time following the public announcement by Minister Sharpe of \$128m of funding available to the region in the next 6 months. With no guidelines around the announced funding and now with no further opportunity through the CRG to discuss until early 2024, one could conclude that the announcement was a publicity stunt during the EIS exhibition period?

To summarise, due to the lack of openness and transparency afforded to community and the willingness to share detailed information around the Cumulative Impacts, I will be resigning from this volunteer position as Community Representative for the Warrumbungle Region.

Please find attached supporting documents detailing questions posed to EnergyCo through the CRG forum to date.



## Division 5.2 State Significant Infrastructure

CWO REZ (Whole of REZ) PROJECT

**NOT IN ACCORDANCE WITH OBJECTS of EP&A Act**

### Cumulative Impacts

Throughout the EIS Document there are many identified significant cumulative and residual impacts from both the delivery of the Transmission Line Project and the associated whole of REZ delivery. The mitigation measures proposed at the EIS stage lack context and detail. It is crucial that the public have input into these mitigation measures for such significant impacts. There are at least 28 Management Plans, Systems and Strategies yet to be developed and these are routinely listed as the “mitigation measure” – when they don't even exist yet for comment. These include:

- Aboriginal Cultural Heritage Management Plan
- Biodiversity Management Plan Construction
- Biosecurity Management Plan
- Bushfire & Emergency Management & Evacuation Plan
- Constriction Noise & Vibration Management Plan
- Community Wellbeing Strategy
- Complaints Management System
- Construction Waste Management Plan
- Driver Fatigue Management Plan
- Environmental Management Plan
- First Nations Liaison Group
- Historical Heritage Management Plan
- Industry Participation Plan
- Landscape Character & Visual Impact Management Plan
- Landowner Engagement Strategy
- Local Workforce Participation Strategy
- Operational Communications Plan
- Operational Emergency Management Plan
- Pre-Construction & Construction Communications & Engagement Plan
- Property Management Plans
- Riparian Vegetation Management Plan
- Social Impact Management Plan
- Soil & Water Management Plan
- Traffic Management Plan
- Vegetation Management Plan
- Vehicle Movement Plan
- Workforce Management Plan



The promise of a future management plan, system or strategy provides no detail or confidence to the public in the mitigation of significant cumulative impacts or opportunities.

I note that each of these mitigation measures have varying levels of significance pre-mitigation. It is important for the public to be able to both understand and provide feedback on these proposed mitigation measures. If these aren't detailed in the EIS, how does this allow the public and local government to contribute and collaborate?

There is evidence to demonstrate that some of these strategies and plans should ALREADY be in place and in action. Eg. Community Wellbeing Strategy, Pre-construction communications & Engagement Plan, Social Impact Management Plan

The lack of a community wellbeing strategy and the consideration of trauma-informed community engagement practices has been evident in the engagement activities that have been conducted.

### Overall Comments:

1. The entire CWO REZ project has not undergone any approval process. This Transmission Line EIS is not an adequate way, nor is it in accordance with the relevant legislation, to address any or all of the cumulative impacts and associated opportunities that the whole of REZ project potentially causes or provides.
2. The CWO REZ area includes communities and lands that were severely impacted by cumulative natural disasters. Primarily the Sir Ivan Fire, then the ensuing drought, mouse plague and ironically, 1-in-100-year floods and record hailstorms also. Add these traumas and/or stressors to the numerous impacts from COVID Lockdowns and for the CWO REZ project to engage with communities and residents with no trauma-informed processes and practices is extremely naïve and ill-informed.
3. The potential cumulative impacts identified (20-1 EIS Main Report) are:
  1. Land use, property & Agriculture
  2. Landscape & Visual
  3. Biodiversity
  4. Aboriginal
  5. Social
  6. Economic
  7. Noise & Vibration
  8. Bushfire & general hazards
  9. Air quality
  10. Traffic & transport
  11. Waste Management
  12. Surface water and groundwater supply

When asked through the CRG, *"Who is conducting the ongoing monitoring of the combined water requirements of all proponents and any associated effects/impacts on the regions water tables? This same question around ongoing monitoring and assessment could be applied to each of the significant cumulative impacts eg. TWA, Traffic, noise/vibration, dust, visual amenity, aboriginal heritage, social, economic etc Who has the responsibility of the ongoing monitoring and assessment of each of these? Do they ALL fall ultimately to the Dept of Planning? If yes, what does this monitoring and assessment look like and how best can the communities begin to seek knowledge and understand?"*

The answer provided to the CRG was: "Biodiversity Conservation Services is working with EnergyCo regarding biodiversity offset options that provide a strategic conservation outcome. This may be extended to include large wind and solar projects in the REZ, but this has not been confirmed. A key principle of cumulative impact assessment is that each project is responsible for managing its own impacts to an acceptable level, minimising the overall contribution to impacts. In this regard, it is the responsibility of the proponent to monitor the effectiveness of the mitigation and demonstrate compliance with any approval conditions. DPE typically includes conditions of approval to publish monitoring data as required. In terms of water take, the ability to source water from regulated or unregulated sources, including groundwater sources, is dependent on the available entitlements. As the water source is managed holistically through water sharing plans, there are restrictions on how much can be allocated year upon year. Water Access Licences typically include a requirement to monitor the volumes being extracted. The Department of Planning and Environment carries out audits to ensure proponents are complying with their approval requirements."

Who is responsible for calculating the **sum total** of each impact and assessing its acceptability? Then consider the total from a whole of REZ perspective or a State perspective? Eg. What is the maximum amount of Regent Honeyeater habitat that can be removed in our REZ or across NSW? Is there a maximum level or threshold for every threatened or migratory species impacted? Who is measuring, monitoring and assessing these for each threatened or migratory species, for total native vegetation and threatened ecological communities and for **every identified cumulative impact**? Refer Appendix E EIS Main Report and Table A-3



## **Environmental Planning and Assessment Act 1979 (EP&A Act), Function: State Significant Infrastructure Guidelines**

### **Overall Comments:**

1. The guidelines state **3.1 Introduction** "All SSI projects require the approval of the Minister under Division 5.2 of the EP&A Act before they may proceed. Prior to determination, they are subject to comprehensive assessment with extensive community participation under the EP&A Act. The main steps in the assessment are shown in Figure 1 and explained in more detail in sections 4 to 14 of these guidelines. While all SSI projects undergo the same comprehensive assessment, **the scale and impacts of these projects can vary significantly**. Consequently, **it is important to ensure that the level of community engagement and assessment required for each project is proportionate to the scale and impacts of the project**. All SSI projects are determined on their merits, having regard to their economic, environmental and social impacts and the principles of ecologically sustainable development."
2. As the Transmission Line Project (SSI-48323210) and each RE Project are exhibited independently and assessed on their own merits, I believe it is impossible to establish a true and accurate measure of the scale and impacts that the CWO REZ presents in its entirety. And as such, the level of community engagement and assessment is therefore not proportionate to the collective scale and impact of the CWO REZ. The transmission line project is by default like a "spine" of the CWO REZ, and without its infrastructure approval, many of the associated RE projects may not be able to effectively deliver the energy they will potentially generate. Given the "critical" nature of this Transmission Line project and while there is an attempt to identify the cumulative impacts of all the projects, I urge the DPE and the Minister to consider that this, the CWO REZ project delivery has not been and is not under near enough active monitoring, assessment or scrutiny to ensure that the cumulative and residual economic, environmental and social impacts don't blow out and become disastrous.
3. **3.8 Community Participation:** "Community participation is integral to assessing the merits of SSI projects, leading to the improved design of projects, reduced environmental impacts and ecologically sustainable development. Under the EP&A Act, all SSI EISs must be exhibited for at least 28 days, and anyone can make a submission on the EIS during the public exhibition."
4. I again would like to highlight that while activities were held to offer community participation on an "inform" and "consult" level, the zero % of participation across the REZ is insignificant (refer to table quantifying community participation, pg 4) and can't be accepted as adequate community participation. Nor should it be ignored that the activities offered did not offer opportunities for the public to be "involved" or to "collaborate" in an effort to "empower" the impacted communities.
5. I note with interest that the very exhibition of the EIS is categorised as active community participation, as anyone can make a submission. I see this process mostly as another opportunity to provide feedback, to participate in consultation and not greatly as an opportunity to be involved in potential mitigation measures or planning improvements or in collaborating towards development alternatives and solutions.
6. Some might consider the potential Community Benefit Fund as a way to "empower" the public and the communities, but given the public haven't been involved in the development of the framework that will be used to govern the CBF, it is highly unlikely that the community will successfully be empowered.
7. **5.3 High Standard:** "The EIS must be prepared to a high standard, having regard to the Department's State Significant Infrastructure Guidelines – Preparing a Preferred Infrastructure Report, and should: • be as succinct as possible and easy to understand • reflect community views • contain a technically robust assessment of the impacts of the project • **provide a justification and evaluation of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development**."
8. This EIS, it may be "**as succinct as possible**" as per the guidelines, but even with the extension of 2 weeks, I have yet to read and digest all of the EIS Main Report and the associated technical reports. The time it takes to review the EIS by each community member is time away from their family, their business or employment or their down-time and all at their own cost.

This is significant and nowhere is this acknowledged or considered. The many months it took the proponent to compile the data and prepare the EIS (and I imagine in this instance at taxpayer expense), is disproportionate to the short time-frame that the public has to digest and fact-check not only the content of the EIS but all the associated legislation and guidelines referenced throughout. 9. The guidelines also state that the EIS should **“reflect community views”**. How can this EIS reflect community views, when so few members of the REZ community have participated in the engagement activities? When they have, many have left despondent with not being able to clarify detail or obtain transparent answers to their questions. Many questions were “commonly answered” with, this information will be included in the “detailed design process”.

10. Can EnergyCo please substantiate HOW the principles of ecologically sustainable development have been considered in the EIS and how they influenced the mitigation measures of the economic, environmental and social impacts of the entire CWO REZ? I am unable to draw conclusion that they have been regarded in the compilation of the EIS for the Transmission Project and even less for the REZ in its entirety.

10. If or when the proponent prepares an amendment report or a preferred infrastructure report, I would request that this amendment report also be placed on public exhibition.

11. **10.2 Assessing an SSI application:** In completing its assessment, the Department will typically: • review the design of the project • consider whether the project is compatible with the strategic context • visit the site and surrounds • check whether the project complies with any relevant statutory requirements • analyse the issues raised in submissions and the proponent's response to submissions • carry out targeted community engagement where necessary to investigate key concerns • seek advice from government agencies and independent technical experts • assess the impacts of the project against relevant government standards and criteria • evaluate the merits of the project as a whole, having regard to the economic, environmental and social impacts of the project and the principles of ecologically sustainable development.

12. When **assessing the impacts** of this project in the process of assessing this SSI application, how can the full array of cumulative impacts caused by the REZ be assessed when the project essentially being assessed is the Transmission Line Project?

13. I would like to respectfully ask the Director of Energy Assessments, DPE and the Minister to dutifully consider the fact that potentially the rollout of the REZ Model is being conducted in such haste and utilising legislation and guidelines (that were developed at a time when the REZ Model wasn't even considered) that it cannot possibly assess the impacts in a true, meaningful and transparent way, and in considering this, it might also be considered that by only requiring the Transmission Line project to follow the planning process, is not sound reasoning for the entirety of any Renewable Energy Zone not to be assessed in its entirety AND in an ongoing process, as more and more SSD projects request approval within a REZ area. Thank you for your consideration of this.

## **Environmental Planning and Assessment Act 1979 (EP&A Act), Function: Undertaking Engagement Guidelines for State Significant Projects**

### **Overall Comments:**

1. The guidelines state clear **Community participation objectives**. Proponent-led engagement: The Department expects proponents to adopt the Department's community participation objectives when engaging on State significant projects. These objectives are:

- open and inclusive
- easy to access
- relevant
- timely, and
- meaningful

**Note:** At this point in time I am running out of time to provide extensive detail for this part of my submission (as submissions are closing today and the clock is ticking). I will attached 3 supporting documents that support my conclusion that the REZ Community have NOT adequately participated as outlined in the many relevant legislation, quality assurance standards and guidelines referenced. Including the Departments Community Participation Plan.

There is evidence in the questions raised by community through the CRG that Community Participation has NOT been open and inclusive, easy to access, relevant, timely or meaningful. This is further evidenced in the apparent lack of understanding as displayed in the Community Survey conducted and resulting data attached.

Due to time constraints, I provide the list below to connect questions posed to the CRG and their associated answers (or lack of) as evidence that these Community Participation Objectives have not been adequately adopted.

**Open and Inclusive:** Questions around the engagement of consultants (Turnpike Advisory) to act as EnergyCo Staff eg. The CWO REZ Team including the Project Director, Director of Community & Place, CWO Community Stakeholder & Lead etc. There are many EnergyCo representatives and at any one time (even now) it remains unclear who is or might be a temporary consultant serving a defined term or a permanent EnergyCo staff member. This was highlighted when Community and Stakeholder positions finished during the EIS Exhibition (contracts expired? Again, not transparent) and new positions/contracts commenced.

As Member of, and Treasurer for the Coolah Youth and Community Centre, a volunteer organisation based in Coolah. It was noted that payment for an EnergyCo hire booking was received from Turnpike Advisory for venue hire for a Community Consultation event. This raised questions as to why? What was the firm engaged for? Whether the Advisory firm were engaged purely for staff resources or if their engagement included community consultation expectations and deliverables? The lack of clarity around the engagement terms, transparency around the governance of the engagement only leaves doubt and questions for community.

Note also the question around the land size being considered for the Merotherie Hub and the associated answer at the time. At NO TIME when questioned, did EnergyCo include community and be open with the consideration that this land was being reviewed for potential TWA. The same can be said for the consideration of the Neeley's Lane location – the land was purchased with NO consultation with community regarding its future purpose. No, Open and inclusive cannot be terms associated with the communications received from EnergyCo by Community.

**Easy to Access:** Questions referring to advertising constraints, website structure and location/availability of online information, lack of social media use and the inability to rectify these issues efficiently after receiving feedback.

**Relevant:** Questions around the cumulative impacts have been posed and discussed at most, if not every CRG Meeting. The details of Cumulative Impact Study Findings remain information held by EnergyCo and have not been made publicly available.

Summarised and very basic details around cumulative impacts remain the only information shared and mitigation measures are not being collaborated upon with community.

Note the questions around conflicting maps of the transmission corridor – not relevant info and not open and transparent.

**Timely:** Public media announcement (during EIS exhibition) of \$128m worth of funding to be available to the region in the next 6 months as part of the Community Benefit Fund, but no funding guidelines available or opportunity to discuss through the CRG. No explanation to the CRG as to why the access rights weren't included in Tender 4 of the Tender Guidelines. Information is not timely.

**Meaningful:** The lack of consistent, transparent and honest communication limits the ability to foster meaningful conversation and/or collaboration, it actually prevents it.

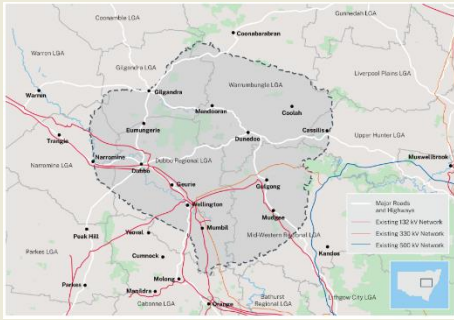
Additional question for the Director of Energy Assessments, DPE & The Minister. When external consultants are engaged for such crucial roles as Project Director and Director of Community & Place (among others) for CSSI Projects **IF** there becomes evidence of negligence or actions not in accordance with specific legislative requirements etc. Who does the responsibility and/or liability fall to? The engaged consultant or EnergyCo? What safeguards are in place for the regions and communities, should an engagement not be delivered effectively? Can the department provide clarity around the Terms of Engagement for any and all consulting firms, such as Tender Guidelines etc, which assumably would have been publicly available information at the time the tenders were announced and publicised?



## Part 4 Renewable Energy Zones and Access Schemes

CWO REZ DECLARATION

**NOT IN ACCORDANCE WITH EIIAct 2020**



Refer Division 1, 19 (4)

(4) The Minister may make a declaration only if the Minister—

- (a) is satisfied that it is consistent with the objects of this Act, and
- (b) has considered the following—
  - (i) existing network infrastructure in the renewable energy zone and the rest of the State,
  - (ii) land use planning, environmental and heritage matters,
  - (iii) the views of the local community in the renewable energy zone,**
  - (iv) other matters prescribed by the regulations.



At NO time, was our Council (Warrumbungle Shire) OR our Communities (Coolah, Dunedoo, Uarby, Leadville, Cassilis) sought to express our views on the Renewable Energy Zone. We “found out” after it was announced and after, Transgrid came to Cassilis to host a Community Consultation session.

The very declaration of the CWO REZ is not in accordance with the EIIAct 2020. The views of the community in the Renewable Energy Zone had not been sought, so couldn't possibly have been considered. (Division 1, 19 (4)(b)(iii))

Note: EIIAct 2020 - 34 Directions for priority transmission infrastructure projects

**(2) The Minister must not direct a network operator to carry out a priority transmission infrastructure project unless the Minister has considered the following -**

- (a) existing network infrastructure in the area in which the priority transmission infrastructure project will be located,
- (b) land use planning, environmental and heritage matters,
- (c) the views of the local community in the area in which the priority transmission infrastructure project will be located,**
- (d) other matters prescribed by the regulations.

**Below is my summary of remaining issues I had planned to raise in this submission in detail, listed as important items to consider. I am simply out of time to continue delving into the report, technical documents and associated guidelines, legislation and correspondence to present a detailed list of questions and reference to associated reports or legislation for each individual item. I have focused up until now on the TWO prominent issues relevant to my roles and experience within our Warrumbungle Community – Community Participation & Cumulative Impacts.**

**Please note the following items/questions as areas of concern that I believe need careful consideration also or noted objection.**

- Dwelling 399 and 717 From photomontages. I object to the proximity of the transmission lines to these two dwellings – 399 & 717. I object in principle to the placement of these high-voltage transmission lines in close proximity to homes, sheds, yards and other vital pieces of farming infrastructure.
- I object to the compulsory acquisition process. There has to be a better way, this is a land rights issue. Landowners should maintain the right to say no, or sell their property in its entirety at an acceptable rate, higher than market value.
- Insurance and liability implications for landholders neighbouring high-value RE projects. This is also a land rights issue. To be forced into a position where the allowable Public Liability cover for their farm, cant and wont cover the value of neighbouring projects should an incident occur where the farmer is liable. This needs to be mitigated and prevented. (See CRG record of Qs from Oct/Nov 23) Noting that landholders had no further luck when communicating this challenge with proponents.
- I object to the use of photo montages that did not show any of the required vegetaion clearing – this is deceptive and misleading
- Decline of land value in project areas and to neighbouring properties
- Under the SBP Scheme, private landowners in NSW will receive annual payments for hosting certain infrastructure associated with new major high-voltage transmission projects that are critical to the energy transformation and the future of the energy grid on their land for a period of 20 years. This scheme should be for the life of the infrastructure, not just for 20 years.
- Construction of the project would result in direct impacts to around 1,032 hectares of native vegetation, including 22 plant community types (PCT). Four of the 22 PCTs expected to be impacted are listed as threatened ecological communities (TECs) under the Biodiversity Conservation Act 2016 (BC Act) and three are listed as TECs under the EPBC Act. In addition, construction of the project has the potential to directly impact 33 threatened flora and fauna species, or their habitats. – Is there an approved conservation advice for each listed threatened species (except one that is extinct or that is a conservation dependent species), and each listed threatened ecological community, at all times while the species or community continues to be listed, as required by the EP&BC Act?
- The Biodiversity impacts are considerable and as such I believe when added to all the other Biodiversity impacts of CWO REZ projects are an unacceptable cost to the region and to our environment. Biodiversity offsets don't begin to recover these impacts. The details strategy of offsets isn't even available yet for review. The greater knowledge I gain of the Offset scheme only adds to my concern for the future of our flora and fauna and to our ability to monitor what species we are forever impacting, while under the illusion that we are “paying” for the protection of like habitats, when in fact they are already existing. The loss, is a loss and will forever be a loss and the addition of funds to any program, does not begin to recover this loss. This ultimately can be proven when we lose protected species. Let us not contribute to the loss of the 33 protected species identified in this EIS.
- Impacts to Aboriginal Cultural Heritage, how can these be measured and accepted or mitigated?
- Irreparable impacts to visual landscapes
- Impacts to agriculture and agricultural businesses
- Community Benefit Fund, while the potential investment in impacted communities appears beneficial and appealing to some, it is worth noting and should be considered that our Councils and Communities lack sufficient volunteer and human resources to effectively

manage existing community driven and Council led projects. Projects are already seeking extensions to reporting due to time constraints from lack of people on the ground. This is a very real challenge, that cannot be underestimated. To throw funding at communities already under such limitations and pressure would only exasperate the problems and increase stress on community volunteers and would also contribute to the failing of future program and project delivery.

- Failed community engagement activities not included in the EIS – this is evidence that should be included. Community Listening Survey – 55 respondents, REZ wide.
- Was a Strategic Options Assessment conducted for the REZ Model initially and include consideration of localised energy generation projects, owned by communities - for communities, owned by suburbs – for suburbs, owned by cities – for cities?
- Groundwater Ecosystem communities – some projects NO impacts? Underground water 20-54?
- Bushfire ignition risks – Extreme during operation?
- Aerial fire-fighting impacts
- Cumulative Impact monitoring and assessment – initial CBA and ongoing? Local Community/CWO REZ/State and National
- Calculation of kW allocation per home by proponents Avg under 2kW? How is this possible? An average household on my own calculations would require 5-10kw at least. This is misleading and inaccurate. If the government is relying on these estimations – these need to be urgently addressed.
- NSW Parliament Enquiry into the feasibility of undergrounding transmission – timing of enquiry is inappropriate for this EIS to progress. The EIS transmission project should not be able to be approved until after the findings of this enquiry are released and considered
- Pg 194 The revised study corridor advertisements were not published in the impacted towns local newspapers, coolah diary, dunedoo diary, merriwa ringer?
- 5.3.2 Summary of Engagement Activities – ends Jan 2023? Community Information sessions were held in Feb 2023 with a significant amount of frustration and angst displayed. No mental health support available. NOT in EIS?
- Page 53 of Technical paper 7, listing hospitals in Warrumbungle LGA. Hospital table 4.4.2.3 This information is incorrect and incomplete.
- Who checked the content of the Technical papers for local accuracy? If something as important as hospitals in a LGA can be incomplete and inaccurate, how can we be assured that the rest of the local information is correct and/or complete? I have not had time to fully read any of the papers cover to cover. Should the accuracy of this information actually RELY on public submissions to pick these up and correct them? I don't think so.
- Workforce anticipation 14-5 "Approximately 10 per cent of the construction workforce is expected to be from the study area and the remaining workforce is expected to come from within NSW." – How can these predictions be realistic? Confirming that no international workforce is expected to work on the Transmission Line Project?
- Accessibility of panel discussions/information sessions
  - Not willing for information sessions to be livestreamed to allow all community members to view the panel answers at their convenience. Similar to how a Council Meeting is livestreamed.
- Further Supporting Documents - CRG Minutes link (8x Meeting minutes)  
<https://www.energyco.nsw.gov.au/cwo/working-community>

The following parts of the undertaking-engagement-guidelines-for-ssp, I query whether in the delivery of the REZ and the Transmission project if EnergyCo are effectively utilising and implementing these guidelines?

3.3 Ensure engagement is effective Proponents should remember that high quality planning outcomes rely on effective engagement. Effective engagement occurs when the community, councils and government agencies have the information they need to understand a project and its impacts, and are given the opportunity to participate in a meaningful way. Effective engagement can give a proponent first-hand insight into what people value and how they expect a project will affect them.

When engagement is carried out in an effective and meaningful way, productive working relationships that enable important conversations between all parties with an interest in a project can be established. This in turn can provide the foundation for good planning decisions. While this does not guarantee consensus, effective engagement means the community acknowledges the assessment was fair and transparent and understands how various and diverse views and concerns were considered, and how those views shaped the final design of the project. To facilitate meaningful engagement, the proponent should show how feedback was considered and how it influenced the final shape of the project.

3.4 Ensure engagement is proportionate to the scale and impact of the project The proposed engagement activities for a State significant project should be proportionate to the scale and likely impacts of the project and the likely interest the community might have in the project. Proportionate engagement prevents consultation fatigue and keeps costs and time impacts to reasonable levels while remaining meaningful. Proportionate engagement relates to the:

- scale and likely impacts of the project
- geographic reach of engagement
- number of activities (including the number of tailored activities, for specific groups)
- stages of engagement.

3.7 Implement the community participation objectives State significant projects, by their very nature, are likely to impact or attract interest from a diverse range of people and groups. To engage effectively, a proponent should:

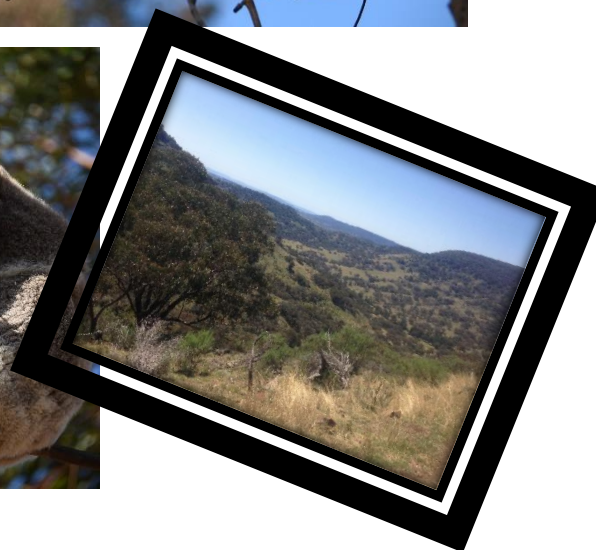
- identify the people or groups who are interested in or are likely to be affected by the project
- use appropriate engagement techniques. This is particularly important when engaging with specific groups, such as Aboriginal and Torres Strait Islander groups, where engagement should be a discrete, planned activity undertaken by and with experienced Indigenous engagement specialists
- ensure the community are provided with safe, respectful and inclusive opportunities to express their views
- involve the community, councils and government agencies early in the development of the proposal, to enable their views to be considered in project planning and design
- be innovative in their engagement approach and tailor engagement activities to suit the:
  - context (e.g. sensitivity of the site and surrounds)
  - scale and nature of the project and its impacts
  - level of interest in the project
- provide clear and concise information about what is proposed and the likely impacts for the relevant people or group they are engaging with
- clearly outline how and when the community can be involved in the process
- make it easy for the community to access information and provide feedback
- seek to understand issues of concern for all affected people and groups and respond appropriately to those concerns
- provide feedback about how community and stakeholder views were used to shape the project or considered in making decisions
- be able to demonstrate how the demography of the area affected has been considered in how and what engagement activities have been undertaken. More detailed information on the expectations for engagement at each phase in the environmental assessment is provided in Appendix A.

Appendix A:

Table 1: Engagement at each phase in the environmental assessment

Phase	Expectation
Preparing the EIS	The proponent must: <ul style="list-style-type: none"><li>• implement any engagement activities required by the SEARs (including engagement with relevant government agencies, council and the community)</li><li>• inform the community about the opportunities to engage</li><li>• explain how community feedback will be considered and documented</li><li>• provide relevant information in plain English so that potential impacts and implications can be readily understood</li><li>• be clear about the level of influence engagement will have by identifying what elements can be changed as a result of feedback</li><li>• give the community the opportunity to voice their concerns or share local knowledge so that this information can be considered early on in the planning, design and assessment</li><li>• consider the issues raised by the community, council and relevant government agencies when making project refinements and accurately reflect how these issues have been addressed in EIS documentation</li><li>• keep the community, council and relevant government agencies informed with up-to-date information on the project.</li></ul>
	The community is able to: <ul style="list-style-type: none"><li>• seek clarification about the project and its impacts</li><li>• provide timely feedback to the proponent about aspects of the project which they support, do not support or wish to be adjusted</li><li>• provide clear reasons for any concerns to enable the proponent to consider possible alternative approaches to address the issues</li></ul>





To protect the amazing beauty of our environment, our home – I object to this project & the CWO REZ.