

**INQUIRY INTO IMPACT OF RENEWABLE ENERGY
ZONES (REZ) ON RURAL AND REGIONAL
COMMUNITIES AND INDUSTRIES IN NEW SOUTH
WALES**

Name: Miss Emma Bowman

Date Received: 31 January 2025

Partially
Confidential

Impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in New South Wales – Emma Bowman, Dunedoo - Submission

Contents

Overview/Introduction	Page 3
Central West Orana Renewable Energy Zone	Page 4
Consultation & Declaration (4)	
Declaration Amendment (6)	
CWO REZ Regional Reference Group (8)	
CWO REZ Community Reference Group (9)	
Legislation (10)	
The Energy Corporation of NSW (EnergyCo)	Page 14
Overview (14)	
Community Consultation/Engagement (14)	
CWO REZ Transmission Route & Siting of Major Infrastructure (21)	
Treatment of Transmission Affected Landowners (26)	
Strategic Benefit Payments Scheme (31)	
Land Acquisition (Just Terms Compensation) Act 1991 (32)	
Port to REZ Road & Utilities Upgrades (34)	
Revolving Door of Employees/Consultants/Contractors (39)	
Undisclosed Consultants (40)	
Annual Reports (41)	
Rates of Pay (41)	
Accountability (43)	
Headroom Assessment (44)	
Correspondence (47)	
ACERREZ – Acciona, Cobra & Endeavour Energy	Page 98
Overview (98)	
Community Consultation (98)	
Meeting Notes (101)	
Correspondence (106)	
Department of Planning, Housing and Infrastructure (DPHI)	Page 133
Overview (133)	
Errors/Inaccuracies (134)	
NSW Major Projects Planning Portal (135)	
Renewable Energy Planning Framework (135)	
Correspondence (142)	
NSW Independent Planning Commission (IPCn)	Page 153
Overview (153)	
Correspondence (155)	
Australian Energy Infrastructure Commissioner (AEIC)	Page 160
Overview (160)	
Community Engagement Review (160)	
Property Rights Australia & NREN Community Impact Survey	Page 162
New South Wales Government	Page 165
Overview (165)	
Meetings with Ministers (165)	

Correspondence (170)	
Australian Government	Page 188
Large Scale Renewable Energy Target (188)	
Warrumbungle Shire Council	Page 189
Overview (189)	
Correspondence (190)	
Western Regional Planning Panel	Page 202
Correspondence (202)	
Dealings with Renewable Energy Developers	Page 205
Overview (205)	
Acciona Energia (205)	
ACEN Australia (209)	
Ark Energy (216)	
Eco Energy World (217)	
Ib Vogt (218)	
Lightsource BP (222)	
Marble Energy (223)	
RES (Renewable Energy Systems) (223)	
Tilt Renewables (223)	
Community Educating Community	Page 225
Unresolved & Unmitigable Issues	Page 233
Community Engagement (233)	
Social Licence (234)	
Community Division (234)	
Mental Health Impacts (234)	
Social Impacts (241)	
Roads, Transport & Traffic (243)	
Bushfire Risk & Limitations to Firefighting (249)	
Impacts to Agriculture (252)	
Biosecurity & Land Management (253)	
Surface Water, Ground Water & Erosion (255)	
Property Values & Insurance (256)	
Livestock Contamination & Health (257)	
Workforce & Accommodation (258)	
Telecommunications & Connectivity (261)	
Biodiversity (262)	
Noise Impacts (264)	
Visual Amenity (264)	
Cumulative Impacts (266)	
Large Scale Renewable Energy Project Submissions	Page 269
Bellambi Heights Battery Energy Storage System (269)	
Birriwa Solar (269)	
Burrendong Wind (282)	
CWO REZ Transmission Project (287)	
Dubbo Firming Power Station (302)	
Lawson Park Road Solar (305)	
Liverpool Range Wind (309)	
Sandy Creek Solar (310)	
Spicers Creek Wind (334)	
Tallawang Solar (373)	

Thunderbolt Wind (373)
Valley of the Winds Wind (380)
Wallaroo Solar (381)

The Broader Issues	Page 388
Time Wasted & The Ultimate Cost	Page 389
Conclusion	Page 390

Overview/Introduction

Firstly, I would like to take the time to thank the members of Portfolio Committee No. 4 for establishing the Inquiry into the impact of Renewable Energy Zones (REZ) on rural and regional communities and industries in New South Wales. I believe a lot of valuable information will come to light through this inquiry and hope it will lead to recommendations and action from the Government that will benefit those who are impacted by REZ's now, and into the future.

I am a fifth generation farmer from Dunedoo, in Central West New South Wales. My partner and I, with assistance from my semi-retired but very active parents, run a self-replacing Merino sheep flock, a herd of self-replacing Shorthorn and Poll Hereford cattle and cropping enterprise on a portion of my great, great grandparents' original property. The Bowman family has been farming in the Dunedoo district for more than 200 years. Generational farming families are very common within the region, hence the reputation as a tightly held farming district and a community that proudly relies heavily on agriculture.

The Central West has faced its share of challenges throughout history but my personal experience is obviously within my nearly forty year lifetime. As a region that relies predominantly on the agriculture industry our success is predominately dictated by Mother Nature. In the twenty two years that I have been working full time on the farm, initially working for Dad and then after taking ownership of the property following succession planning, I have seen devastating fires, droughts, floods, storms and locust and mouse plagues. On top of being at the mercy of the weather farmers are also vulnerable to sometimes severe market fluctuations; supply and demand is something we have little to no control over, and forced sales due to weather conditions and/or natural disasters mean there is even less command over the value of the commodities we produce.

I cannot say for sure when I first learnt about the Central West Orana Renewable Energy Zone (CWO REZ), which comes as quite a shock now as it has become such a big part of my life; it could even be described as the bane of my existence, the thorn in my side! My first objection to a large scale renewable energy infrastructure project was in August 2022. I would characterise the time since then as traumatic, frustrating, disheartening, exhausting, soul destroying and devastating.

I will detail throughout this submission my main concerns with large scale renewable energy infrastructure projects, more generally the "rapid transition to renewable energy" and the impacts it is having on rural and regional communities like mine and those that surround it but one of the biggest issues with the "transition" is the way it has been rolled out. We have seen first hand, on the ground in the CWO REZ, that community engagement, consultation and social license are just words! Rural and regional landowners and community members are being steamrolled and treated like second class citizens all in the name of the "rapid transition to renewable energy".

I believe for a lot of rural and regional landowners and community members this inquiry is the last roll of the dice so to speak. People have spent countless hours writing submissions, lobbying politicians, meeting with EnergyCo, renewable developers and now ACERREZ to no avail. I sincerely hope this inquiry has the power to make meaningful change to what has been a poorly designed and executed plan to date.

Central West Orana Renewable Energy Zone

Consultation & Declaration

The Central West Orana Renewable Energy Zone (CWO REZ) was authorised by former NSW Minister for Energy and the Environment, The Hon. Matthew Kean on the 28th October 2021 and formally declared on the 5th November 2021. I can, without hesitation, say that at least 95% of the Australian population would not have heard of, nor understood, what a REZ was at that time, especially those who were going to bear the brunt of the impacts of the decisions that were made without local community involvement.

To that point, I do not believe there was adequate consultation prior to the declaration of the CWO REZ. The below screenshots taken from Budget Estimates 2023-24 Portfolio Committee No. 7. – Planning and Environment, Answers to Supplementary Questions, 7 March 2024 Hearing state that the “draft declaration was exhibited on the former Department of Planning, Industry and Environment’s website for public consultation for 28 days from 17 September 2021 to 15 October 2021.” It is very telling that only six submissions were received, all from “stakeholders” (three renewable energy developers, two public authorities and one organisation), none from the general public! Given the number of submissions that are being received for individual projects currently (eg. 401 for the CWO REZ Transmission project, 139 for two exhibitions of the Birriwa Solar project, 243 for Burrendong Wind) I conclude that the general public were blissfully unaware of the draft declaration. Considering also the lack of evidence provided by the Minister of community and/or landowner meetings through the Budget Estimates questioning, the fact that submissions to the draft declaration have remained confidential, and that local community views were considered and measured simply because the then DPIE advised the then Minister that the obligations of community engagement had been met, does this suggest the legislated consideration of local community views when declaring a REZ has been breached?

Questions from the Hon John Ruddick MLC

PLANNING AND ENVIRONMENT

Climate Change, Energy, the Environment, Heritage

1	The Renewable Energy Zone (Central-West Orana) Order 2021 was published in the Government Gazette of the State of New South Wales on 5th November 2021. The Energy Infrastructure Investment Bill 2020 states in Part 4, Division 1, Section 19 (4) The Minister may make a declaration only if the Minister (b) has considered the following (iii) the views of the local community in the renewable energy zone.
(a)	Where was the CWO REZ draft declaration document exhibited?
(a)	In accordance with the Minister’s statutory obligations under section 20(e) of the <i>Electricity Infrastructure Investment Act 2020</i> , the Central-West Orana Renewable Energy Zone (REZ) draft declaration was exhibited on the former Department of Planning, Industry and Environment’s website for public consultation for 28 days from 17 September 2021 to 15 October 2021.
(b)	How many submissions were received during the CWO REZ draft declaration exhibition period?

(b)	<p>Six submissions were received from stakeholders during the draft consultation period. All submissions were in support of the exhibited draft (three from renewable energy developers, two from public authorities, and one from an organisation).</p> <p>No submissions were received from members of the general public, and no objections were received from any stakeholders.</p>
(c)	Are all submissions received throughout the CWO REZ draft declaration exhibition period available publicly? If they are publicly available, where are they located?
(c)	<p>Submissions were provided on the grounds that they would be confidential. Submissions will not be published.</p>
(d)	Were there any meetings held, within the then proposed CWO REZ boundary, to consult with stakeholders and/or community regarding the CWO REZ draft declaration? If yes, please provide all:
(d)	<p>Consistent with the Minister for Energy's statutory obligations under section 19(4)(b)(iii) of the <i>Electricity Infrastructure Investment Act 2020</i>, the declaration was made in consideration of the views of the local community in the REZ. This included through landowner meetings, direct engagement with local councils, mailouts, and establishment of a Central-West Orana REZ Regional Reference Group with local community representatives. The proposed scale and scope of the Central-West Orana REZ identified in the declaration had been publicly available since the NSW Government's submission on AEMO's Integrated System Plan in March 2018.</p>
(e)	What process did the Minister use to consider and measure the views of the local communities in the CWO REZ declaration?
(e)	<p>The former Department of Planning, Industry and Environment advised the Minister at the time that the declaration could be made consistent with statutory obligations under the <i>Electricity Infrastructure Investment Act 2020</i>, including that views of the local community in the REZ had been considered and that the draft had been published for 28 days on the Department's website.</p>

During one of the early introductions between community and EnergyCo I clearly remember former EnergyCo Executive Director, Planning and Communities, Mike Young saying that if we had looked for information regarding the CWO REZ we would've found it. Our question in response was "how do you know to look for something you have never heard of?"

On the 21st December 2023 EnergyCo uploaded a video to YouTube titled "renewable energy zone deed signing with ACERREZ". James Hay, then CEO of EnergyCo, said that the "commitment deed is the culmination of work in New South Wales on renewable energy zones. It started actually in 2013 so it's really a decade of work that's led to this moment." I wonder how many opportunities there would have been since 2013 to adequately consult with the impacted communities?

The vast majority of community members and landowners residing in the Central West and Orana regions of NSW were completely blindsided by the imposition of the CWO REZ into our communities, as I have been informed was my Local Council, Warrumbungle Shire Council (WSC) (evidenced in the below response to issues raised regarding the Lawson Park Solar project).

Response from Planner	My Question/Response/Comment	WSC Response
The subject land is within the Renewable Energy Zone and will be returned to agricultural land at the end of the development's lifespan.	<p>The subject land being located within the Central West Orana Renewable Energy Zone is not adequate justification for the proposed project. Unless Warrumbungle Shire Council has been misleading its ratepayers, the Council, not unlike the general public, was not consulted prior to the declaration of the CWO REZ which is unlawful conduct by the NSW Government. The Energy Infrastructure Investment Bill 2020 states in Part 4, Division 1, Section 19 (4) The Minister may make a declaration only if the Minister (b) has considered the following (iii) the views of the local community in the renewable energy zone.</p> <p>5.1 How were Warrumbungle Shire Council staff and councillors made aware of the draft CWO REZ declaration at the time it was exhibited by the then DPIE, now DPHI?</p> <p>During the exhibition period of the draft CWO REZ declaration there were six submissions received - three from renewable energy developers, two from public authorities and one from an organisation - not one from a member of the public suggesting</p>	The Central West Orana REZ was formally declared on 5 th November 2021. The Community Reference Group was established in August-2022 and included Councillor Kathy Rindfleish from WSC and several community members. The first meeting of the CRG was September 2022, at which EnergyCo advised what the CWO-REZ was and why it was identified as the first REZ under the Electricity Infrastructure Roadmap. Community consultation had already been completed prior to this meeting. Therefore WSC was not consulted prior to the declaration of the REZ.

The declaration of the CWO REZ and subsequent community consultation administered first by Transgrid, and later EnergyCo, has been very poorly managed and executed causing undue financial burden, stress, frustration, trauma and angst.

Declaration Amendment

The following screenshots were also taken from Budget Estimates 2023-24 Portfolio Committee No. 7. – Planning and Environment, Answers to Supplementary Questions, 7 March 2024 Hearing. Through this avenue it has come to light that all submissions received by EnergyCo from members of the public regarding the declaration amendment were objections. Given that the submissions have not, and will not be published how can it be guaranteed that EnergyCo adequately considered the views, potential alternatives and impacts raised by members of the public before doubling the output of the CWO REZ? Is it acceptable that given every member of the public that commented was in opposition yet the proposed increase in generation capacity was still authorised?

2	In December 2023, a declaration amendment was made by the Minister to increase the capacity of the CWO REZ from 3GW to 6GW. EnergyCo invited feedback from the public regarding the proposed declaration amendment.
(a)	How many submissions were received by EnergyCo during the CWO REZ declaration amendment community feedback invitation period?
(a)	<p>While the <i>Electricity Infrastructure Investment Act 2020</i> does not include any statutory obligations for consultation on declaration amendments, EnergyCo applied processes that would otherwise be required for a declaration to be made, including a 28 day exhibition period for consultation on the draft declaration.</p> <p>Fifty-seven submissions were received from stakeholders during the draft declaration amendment exhibition period. Forty-nine objections were received, all from members of the public. Six submissions supported the declaration, including from renewable energy developers and community groups. Two submissions from public authorities made comments and did not explicitly support or object to the amendment.</p>

(b)	Are all submissions received throughout the CWO REZ declaration amendment community feedback invitation period available publicly? If they are publicly available, where are they located?
(b)	Submissions were provided on the grounds that they would be confidential. Submissions will not be published.
(c)	What process did EnergyCo use to consider and measure the feedback received through the draft declaration amendment community feedback invitation period?
(c)	<p>While the <i>Electricity Infrastructure Investment Act 2020</i> includes no statutory obligations for consultation on declaration amendments, EnergyCo applied processes that would otherwise be required for a declaration to be made, including to consider the views of the local community in the REZ.</p> <p>EnergyCo sought feedback through the formal submission process and directly through community ‘pop-ups’, the Central-West Orana REZ Regional Reference Group, and other regular landowner and community events as part of EnergyCo’s standing community engagement and landowner consultation program. The draft amendment was informed by an earlier consultation on the scale and impact of the Central-West Orana REZ in early 2023. Outcomes of that consultation are available on the EnergyCo website at www.energyco.nsw.gov.au/cwo-rez#registration-of-interest.</p>
(d)	Can EnergyCo please demonstrate how they utilised the feedback received? Please give specific examples.
(d)	EnergyCo used feedback to inform a recommendation that the Minister make the amendment. EnergyCo considered the representativeness of submissions and the relevance of issues raised to the amendment. Objections largely related to land-use impacts and were not directly related to the proposed declaration amendment. EnergyCo considered feedback provided on the declaration amendment to inform its response to submissions on the Central-West Orana REZ Environmental Impact Statement.

It seems that EnergyCo is under the impression that the fifty seven members of the public, myself included (refer to email [EnCo 16](#), under EnergyCo correspondence), that made submissions to the declaration amendment do not accurately represent the greater population - I wonder how EnergyCo accurately measured the sentiment of the inhabitants of the CWO REZ to come to such a conclusion? I also question how an increase in generation capacity, and therefore an irrefutable multiplication of land required for large scale renewable energy infrastructure (ie. land use impacts), the possibility of double in fact, was not considered to be “directly related” to the declaration amendment?

To this day there is no maximum capacity stated for the CWO REZ, nor I believe any of the other five currently declared REZ’s in NSW, which leaves the regions vulnerable to being completely inundated by large scale renewable energy infrastructure developments and transmission lines. What are the

potential implications of valuable, productive, food and fibre producing land being instead used to host energy infrastructure?

CWO REZ Regional Reference Group

According to the Draft Terms of Reference for the CWO REZ Regional Reference Group (RRG), released in October 2020, “the Regional Reference Group is part of the NSW Government’s commitment to engage with the community, landowners and other interested stakeholders about the development of the REZ. Established in advance of securing any generation projects or defining the transmission route, the Regional Reference Group will provide input into the design and development of the REZ, with a focus on exploring ways to maximise and share benefits for regional communities from the project.” The scope of the RRG “enables local communities in the Central-West Orana region to engage with the NSW Government, renewable generation proponents and TransGrid as the transmission developer, in managing the potential impacts of the REZ on the community, landholders, the local economy and the environment. The Regional Reference Group may also advise EnergyCo NSW on how the community wishes to be notified and kept informed on matters related to the REZ.”

Not unlike the draft declaration of the CWO REZ, I was not personally aware, neither do I believe was a huge majority of the population, of the inception of the CWO REZ RRG in October 2020. EnergyCo’s website did not have any information available about the Group which prompted a futile, three month email conversation with EnergyCo employees (refer to email [EnCo 06](#) under EnergyCo correspondence) in which I was informed that the RRG meeting minutes were not publicly available.

It was also made very clear throughout the aforementioned email chain that the RRG preceded EnergyCo’s role as infrastructure planner for the REZ’s. Although that is technically true given the CWO REZ was not formally declared until November 2021, EnergyCo was recorded as the host of five of the six Regional Reference Group meetings, Transgrid hosted the first meeting in October 2020. In order to access the CWO RRG meeting minutes I was required to lodge a formal GIPA request and pay for the information. My request was lodged on 12th September 2024 and I received the requested records on 4th October 2024. While searching the EnergyCo website for other information on the evening of 20th October 2024 you can imagine my surprise and frustration when I happened upon the RRG meeting minutes that I was previously told were not made publicly available and had recently paid to access. What reason could EnergyCo have had for not previously allowing me access to those documents?

Amongst the information I received under the GIPA request was the following:

Reason that some information could be found

Please note Meeting 5 of the CWO Regional Reference Group was initially scheduled for 5 April 2022 but appears to have been moved to 3 May 2022. We cannot confirm if this meeting was held, and no record of the minutes can be located. This was to be the final meeting of this Group. The EnergyCo representatives who were listed to attend the meeting no longer work for EnergyCo.

Is it acceptable that a statutory authority cannot meet its recording obligations regardless of staff changes?

The Central West Orana Regional Reference Group Draft Terms of Reference lists the appointment and membership of the RRG which includes Local Councils, TransGrid, Essential Energy and the Department of Regional NSW, chaired by DPIE/EnergyCo NSW. It then goes on to state that “other key stakeholders that would be invited to attend the Regional Reference Group as appropriate include: representatives of the farming communities of the Central-West Orana Region.” There are no specific representatives of farming communities identified in either the attendees or apologies lists for any of the four CWO REZ RRG meetings – has the Government fulfilled the commitment to engage with the community and landowners about the development of the REZ? Does the lack of representation of farming communities

suggest they did not have input into the design and development of the REZ, nor explore ways to maximise the benefits of such a project?

My original email requesting information regarding the CWO REZ RRG relayed that I was under the impression the RRG then became the Industry Working Group. I did not receive any information about the Industry Working Group throughout my search for the RRG meeting minutes. I am somewhat confused as to where it disappeared to and if there were ever any meetings or outcomes from this group?

Industry Working Group

The Industry Working Group (the former Regional Reference Group) for the CWO REZ will be re-established to focus on matters related to:

- the design and development of the project and the Central-West Orana REZ, including ways to secure enduring benefits and regional development opportunities
- issues and concerns held by regional stakeholders and how these may be managed, including cumulative impacts
- regional strategies including workforce accommodation, employment and training, operational impacts from construction and the use of regional assets.

The Industry Working Group will include:

- local MPs
- government agencies
- local councils
- major renewable energy generators
- NSW Electricity Jobs Advocate.

CWO REZ Community Reference Group

As stated on the EnergyCo website “EnergyCo has established a Community Reference Group (CRG) for the Central-West Orana REZ which aims to provide an open forum for discussion between EnergyCo, the community and key stakeholders about the REZ transmission project and broader REZ issues. The CRG was established in August 2022.”

According to the Terms of Reference dated June 2022:

“The CRG aims to:

- Establish good working relationships and promote information-sharing between EnergyCo, local community representatives and key stakeholders
- Provide CRG members with visibility of the project and enable them to share project information via their networks
- Keep members informed about project activities, key milestones and opportunities to provide feedback
- Provide an avenue for EnergyCo to seek community and stakeholder input on project matters
- Allow community members to seek information from EnergyCo and provide feedback.

The CRG provides an advisory function and is not a decision-making authority for the project.”

Establishing a Community Reference Group was a great initiative, however, EnergyCo have not to date used the forum as it was intended. Throughout my submission you will see screenshots of questions asked, inadequate or no response given, and issues that have been raised since the inception of this group with no solutions or mitigation and no accountability for EnergyCo employees. It seems to be yet another toothless tiger created to tick the box of community consultation without actually achieving any meaningful outcomes for community or affected landowners despite the best efforts of the community and local organisation representatives.

The following was sourced from the CWO REZ CRG April 2023 Meeting Minutes evidencing the above:

<p>EnergyCo announcement of land procured for Worker's Camps: Is it true that EnergyCo has been in contact with neighbouring landholders to land that EnergyCo has acquired for Worker's Camps to advise of purchase and purpose for land? If yes, would this not be helpful information to advise CRG member's of? I have received two phone calls asking me of my knowledge of this, to which I have replied – nothing?</p>	<p>EnergyCo has purchased, on-market, a block of land at 118 Neeleys Lane, Cassilis. EnergyCo is developing plans for the proposed ancillary site which will be subject to assessment and approval as part of the Environmental Impact Statement. Neighbouring residents have been informed of the purchase, however no public announcement has been made. EnergyCo is carrying out further investigations to confirm how the site will be used prior to carrying out further engagement with the community.</p>
--	--

Upon reading the 23rd July 2024 CRG meeting minutes I came across the below:

- Three proposed Workforce Accommodation Camps, as per the EIS: Neeleys Lane, Elong Elong and Merotherie. Stakeholder notifications occurring over the next three to six months to meet conditions of consent.

Those familiar with the CWO REZ Transmission EIS would be aware that there were two Workforce Accommodation Camps proposed at Merotherie and Neeleys Lane. When I questioned an EnergyCo staff member about the aforementioned Elong Elong Workforce Accommodation Camp (refer to email conversation [EnCo 02.](#)) I was informed that there had been an error made as there are in fact only the two camps proposed. I was told that amended minutes would be issued to correct the mistake. You can imagine my surprise when the next time I looked at the minutes on 11th December 2024 this is what I found:

- Two proposed Workforce Accommodation Camps, as per the EIS: Neeleys Lane and Merotherie. Stakeholder notifications occurring over the next three to six months to meet conditions of consent.

Correct procedure for amending meeting minutes according to N.E. Renton's Guide For Meetings, Fifth Edition is "if, after minutes have been confirmed, a mistake is discovered in them, they must on no account be altered. A motion on the lines "that the date '24 October 19...' in line 7 of the minutes of the meeting held on 1 November 19... be corrected to '24 September 19...' " should be carried and recorded in the normal way in the minutes of the meeting which passed it. A cross-reference should also be inserted in the margin or the incorrect minutes."

What other changes have been made to CWO REZ Community Reference Group meeting minutes that have not been discovered? Who is responsible for the minute taking at such meetings? Is this EnergyCo's modus operandi? Should there be an investigation into all of EnergyCo's records?

Legislation

According to the Parliament of New South Wales website, "The State of New South Wales is divided into 93 Legislative Assembly electoral districts. Each electoral district is represented in Parliament by a Member of the Legislative Assembly. State electoral district boundaries are determined by a distribution process which provides for an equal number of electors in each electoral district, allowing for a maximum of 10% variation more or less than the average." This process has led to the seat of Barwon covering 44.5% of the state of NSW; one person to represent the vast, north west of the state, over 356,000 square kilometres, all regional, rural and remote areas. The Governments HealthStats NSW website states that "The NSW population is predominantly urban. In 2023, approximately 75.7% of the NSW population lived in major cities, 19.3% lived in inner regional areas, and 5.0% in outer regional and remote areas." Is it acceptable or fair that metropolitan based Members of Parliament and city-based voters, who do not, in most cases, have any experience of living or working in the regions and agriculture or understand the problems that are faced in rural areas, are deciding the fate of those who live in regional, rural and remote NSW, their communities and environment? There are so many cases where legislation is proposed to meet an outcome, yet the consequences for those to the west of the iron curtain, many of whom are busy feeding and clothing the nation, are either not adequately considered or just plain forgotten due to the extreme lack of representation (take a headcount of how

many MP's there are in metro areas compared to the west) – how can this be changed so rural areas are not bearing the brunt of these unworkable decisions?

Legislation created in the confines of an office in metropolitan NSW, designed by policies generated to appease the wants of the majority of the population, being city dwellers, often do not function as intended in rural areas, or for the agricultural industry. Instead, these regulations often cause farmers, and rural businesses, more paperwork and hoops to jump through, giving them less time to actually produce food and fibre to feed and clothe the nation, and provide economic stimulus to both their immediate regions and the state and country.

Should EnergyCo have been involved in the planning of the CWO REZ prior to the formal declaration on 5th November 2021 when the Minister officially appointed The Energy Corporation of NSW as infrastructure planner for the Central West Orana Renewable Energy Zone? The Electricity Infrastructure Investment Act 2020 does not actually appoint EnergyCo as infrastructure planner for the REZ's.

23 Renewable energy zones in Central-West Orana, Illawarra, New England, South West and Hunter-Central Coast areas

- (1) The Minister is to declare the following as renewable energy zones—
 - (a) Central-West Orana,
 - (b) Illawarra,
 - (c) New England,
 - (d) South West.
 - (e) Hunter-Central Coast.
- (2) The indicative geographical areas of the renewable energy zones are shown on a map published on the Department's website on the commencement of this section.
- (3) The Central-West Orana renewable energy zone has an intended network capacity of 3 gigawatts.
- (4) The New England renewable energy zone has an intended network capacity of 8 gigawatts.
- (5) The Minister is to appoint the Energy Corporation as the infrastructure planner for the Central-West Orana, Illawarra, New England, South West and Hunter-Central Coast renewable energy zones.

RENEWABLE ENERGY ZONE (CENTRAL-WEST ORANA) ORDER 2021

1. **Name of Order**
This Order is the *Renewable Energy Zone (Central-West Orana) Order 2021*.
2. **Commencement Date**
This Order commences on the date that it is published in the Gazette.
3. **Definitions**
Unless otherwise defined in this Order, words and phrases defined in the Act have the same meaning in this Order.
Act means the *Electricity Infrastructure Investment Act 2020*.
specified geographical area means the land identified as the 'Central-West Orana Renewable Energy Zone Geographical Area' in Schedule 1 of this Order.
4. **Declaration of the Central-West Orana renewable energy zone**
The Central-West Orana renewable energy zone is hereby declared and comprises:
 - (a) the specified geographical area; and
 - (b) the network infrastructure specified in Schedule 2 of this Order.
5. **Intended network capacity for the network infrastructure in the renewable energy zone**
The intended network capacity for network infrastructure in the Central-West Orana renewable energy zone is 3 gigawatts.
6. **Central-West Orana renewable energy zone infrastructure planner**
The Minister appoints the Energy Corporation as infrastructure planner for the Central-West Orana renewable energy zone upon commencement of this Order.

Although on EnergyCo's website it states that the CWO REZ "Regional Reference Group preceded EnergyCo's role as Infrastructure Planner for Renewable Energy Zones" it is interesting to note that the Energy Corporation of NSW is listed as the "host" for all bar the first RRG meeting in October 2020, where the host is listed as the NSW Department of Planning, Industry and Environment (DPIE).

The Electricity Infrastructure Investment Act 2020 was introduced into Parliament on the 10th November 2020, passed on the 27th November 2020 and assented on the 3rd December 2020. Countless amendments were suggested in an attempt to better protect rural and regional communities and food and fibre producing land.

There were countless amendments to the Act tabled, especially with regard to Renewable Energy Zones, proposed by The Shooters, Fishers and Farmers Party and One Nation in an attempt to protect rural and regional communities that would go on to bear the brunt of the negative impacts of the "rapid transition to renewable energy". Below is just two such amendments:

The Hon. MARK BANASIAK (09:23:18): I move Shooters, Fishers and Farmers Party amendments Nos 2 and 3 on sheet c2020-286C in globo:

No. 2 Concurrence of Minister for Agriculture and Western New South Wales

Page 10, clause 18(4). Insert after line 19—

- (a1) has the concurrence of the Minister for Agriculture and Western New South Wales, and

No. 3 Landowners within and near renewable energy zones

Page 10, clause 18(4). Insert after line 24—

- (iiia) the views of landowners within and surrounding the renewable energy zone,

In response to these two proposed amendments The Hon. Ben Franklin, MLC, Member of the National Party, said “the Government does not support amendment No. 2 which, as the honourable member stated would require that the Minister first have the concurrence of the Minister for Agriculture and Western New South Wales to declare a renewable energy zone. We do so for the following reasons. As it stands, the bill provides the necessary protections that ensure that renewable infrastructure will not come at the expense of our prime productive agricultural land. In fact, both this bill and the NSW Electricity Infrastructure Roadmap ensure that new energy infrastructure is built in places where our regional communities want and welcome it.... The bill will also empower the Energy Corporation of NSW to support host communities in having their say on the infrastructure they host. The bill provides that the Energy Corporation of NSW may prohibit the connection of certain projects in a renewable energy zone where there is significant opposition from the community in the host region and to maintain community support for the zone. Of course, this may only be applied in certain cases and will respect existing development consents, but it ensures that the interests of communities can be protected if there is strong opposition to a project.... Amendment No. 3 from that party is also not supported because the views of the local landowners are already covered by the bill’s provisions. This is something that has been relatively extensively covered in previous amendments. Under the current bill, a renewable energy zone may only be declared if the Minister has, among other things, considered the views of the local community in the renewable energy zone....”

Unfortunately, experience on the ground has proven that the bill does not provide enough protection for valuable, productive agricultural land and large scale renewable energy infrastructure will come at the expense of food and fibre production. We have also learnt that EnergyCo does not support “host” communities “having their say on the infrastructure they host” – compulsory acquisition has stolen that right from landowners. What is considered “strong opposition” – projects whose EIS’s elicit a small overall proportion of, or even no, submissions in support of the proposal? We are seeing those projects approved and constructed so is the renewable energy infrastructure actually being “built in places where our regional communities want and welcome it”? What is deemed “consideration” of local community views – what percentage of “locals” must/did the Minister consult before declaring and of the current five REZ’s?

The Electricity Infrastructure Investment Act may well have protected rural and regional communities, landowners and agricultural land if it was strictly adhered to through measurable outcomes. However, what we have seen is community input completely discarded in an attempt to just ‘get the job done’!

The Regional Communities (Consultation Standards) Bill 2024 was introduced into Parliament by Mr. Roy Butler, Member for Barwon, on 20th June 2024, passed on the 16th October 2024 and assented on the 23rd October 2024. Mr Butler said “the importance of this bill for regional communities cannot be underestimated. Some of the most vulnerable and disadvantaged communities in New South Wales are in Barwon, so when public money is invested in projects in these communities, it is critical that the communities understand the investment and are central to the projects' outcomes and that there is accountability for just how that money is being spent. Unfortunately, we find time and time again that that is not the case. Communities become victims of DAD consulting—that is, “decide, advise, defend”—and government projects intended to do good cause division. There are so many examples of government decisions causing division in Barwon. The tyranny of distance means it is harder for agencies and government officials to engage meaningfully with many of our towns. Rather than attempts at meaningful engagement, we see links to “Have your say” websites. We see drop-in sessions that are poorly advertised on social media and, frankly, designed to divide and conquer. Social media advertising does not work out west. Connectivity is often fraught with blackspots, outages and ageing telecommunication infrastructure. Many people who would be impacted by a project do not know that the information drop-in sessions are happening, because they are advertised only on social media. They

find out far too late and cannot cover the distance in time to contribute. Communities know what they need, but they are disadvantaged by current consultation processes.....”

The Legislature of New South Wales enacts—	1
1 Name of Act	2
This Act is the <i>Regional Communities (Consultation Standards) Act 2024</i> .	3
2 Commencement	4
This Act commences on the date of assent to this Act.	5
3 Definition	6
In this Act—	7
regional community means a community outside the Greater Sydney Region.	8
Note— The <i>Interpretation Act 1987</i> contains definitions and other provisions that affect the interpretation and application of this Act.	9 10
4 Consultation of regional communities to comply with standards	11
(1) A consultation with a regional community by or on behalf of the State, a NSW Government agency or a statutory body representing the Crown must be carried out in accordance with the prescribed standard.	12 13 14
(2) This section does not apply to a consultation required by an Act to be carried out in a specified way.	15 16
(3) A failure to comply with this section does not affect the validity of a consultation.	17
(4) In this section—	18
prescribed standard means—	19
(a) until the regulations otherwise provide—the <i>Quality Assurance Standard For Community and Stakeholder Engagement</i> published by the International Association for Public Participation (IAP2 Federation) in May 2015, with all necessary changes, or	20 21 22 23
Note— The <i>Quality Assurance Standard For Community and Stakeholder Engagement</i> is available at https://iap2.org.au .	24 25
(b) a standard prescribed by the regulations for this section.	26
5 Regulations	27
The Governor may make regulations about a matter that is—	28
(a) required or permitted by this Act to be prescribed, or	29
(b) necessary or convenient to be prescribed for carrying out or giving effect to this Act.	30 31

Whilst I believe the intention of this Bill would be welcome by rural and regional communities, I am concerned that it is not worth the paper that it was written on. We see other legislated requirements for community consultation and engagement yet the action on the ground is devoid of any genuine effort and outcomes. Does clause 3 (a failure to comply with this section does not affect the validity of a consultation) render the bill utterly ineffectual and therefore useless?

The Energy Corporation of NSW (EnergyCo)

Overview

It might sound somewhat dramatic but I can honestly and categorically state that my life has changed for the worse since I started dealing with The Energy Corporation of New South Wales (EnergyCo). Upon being informed by other community members and CWO REZ transmission affected landowners alike of the experiences undergone during transactions with members of the EnergyCo team it reminded me of my family's experience with the then Roads and Maritime Service (RMS), now Transport for NSW (TfNSW), during planning and construction for the Golden Highway upgrade in the late 2000's. We were constantly, from our very first encounter with staff, reminded of RMS's compulsory acquisition power, and made feel like we had little to no choice in a package of works that would ultimately impact our property into the future. We had to fight tooth and nail to have our opinions heard and lost a number of battles which eventuated in negative impacts to our property that we had to, and continue to mitigate at our expense – all consequences of a lack of adequate planning, expertise, thorough research and a complete disregard for local knowledge and feedback.

I have spent the better part of two years, sometimes eight hours a day, even though I have a full time job running a farm business, attending meetings, drop in sessions and forums, researching, writing submissions, lobbying politicians, and supporting transmission affected landowners because I am not willing to stand by and watch EnergyCo's oversights, errors and uncompromising actions irreparably destroy my community and industry all in the name of the "rapid transition to renewable energy".

I do not believe that every EnergyCo employee, contractor or consultant should be tarred with the one brush as I have had some productive discussions with regard to the CWO REZ, but I will say that there are major problems within the organisation that have not been rectified by the departure of some 'bad apples'. There are serious issues with information being heard 'on the ground' not making it 'up the chain' and an appalling lack of transparency and communication between the government authority and affected communities and the general public.

Community Consultation & Engagement

According to the Queensland Government, "Community consultation is not just a procedural step; it is a fundamental aspect of responsible program design and implementation. It involves engaging with community members, listening to their voices, and understanding their unique needs, challenges, and aspirations. This process is essential because it lays the groundwork for developing programs that truly address the issues faced by the community. Undertaking genuine community consultation can lead to more relevant and impactful solutions. Instead of imposing preconceived ideas or solutions onto the community, consultation allows us to identify the most pressing issues and co-create strategies to address them. By actively involving community members in the decision-making process, we empower them to take ownership of the solutions, fostering a sense of pride and investment in the outcomes. Community consultation helps us to understand the cultural nuances and sensitivities of the community. Each community is unique, with its own traditions, values, and ways of life. By engaging with community members directly, we can gain insights into cultural practices and preferences, ensuring that our programs are respectful, inclusive, and relevant."

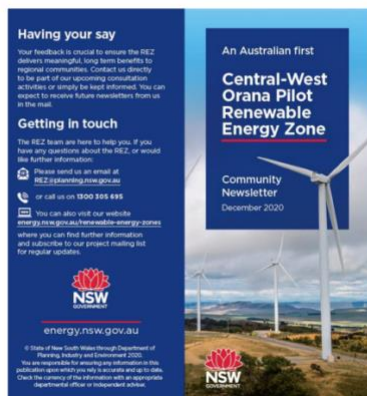
There is nothing I can add to the above paragraph to better portray the significance of good community consultation; it is obvious Government is aware of its importance, on paper! It is the foundation of every nation and community building project and can mean the success and/or failure of any proposal. Poor community consultation and engagement leads to a raft of other issues as a result of not listening to local skills, experience and knowledge, not adequately taking feedback into account and responding to the satisfaction of those providing comment, and ignoring the wants and needs of the communities "hosting" such projects.

As previously outlined, EnergyCo's community consultation and engagement has been found to be ineffective and futile. On paper, their method and intentions seem extensive, proactive, practical and supportive but the reality, in the rollout on the ground, has been substandard, hopeless even, and to be honest, infuriating.

The below was sourced from the CWO Regional Reference Group EnergyCo PowerPoint Presentation February 2021 (the first RRG meeting where EnergyCo was listed as host):

Central-West Orana REZ Consultation & Engagement

- Consultation on the study corridor begun in December 2020, including a community newsletter on the REZ to landowners and residents and businesses in Dubbo, Wellington, Gulgong & Gilgandra
- **Upcoming consultation:**
- Community deliberative forums including around 20 invited people from a representative sample of local residents and other key stakeholders:
 - Monday 22 February 2021: Dubbo
 - Tuesday 23 February 2021: Wellington
 - Wednesday 24 February 2021: Gulgong
- Next community newsletter to landowners in the study corridor in March 2020 including a copy of the 'Renewable Energy Landholder Guide' we supported NSW Farmers in developing
- Building an on-the-ground presence in the Central-West Orana region



Communications and messaging

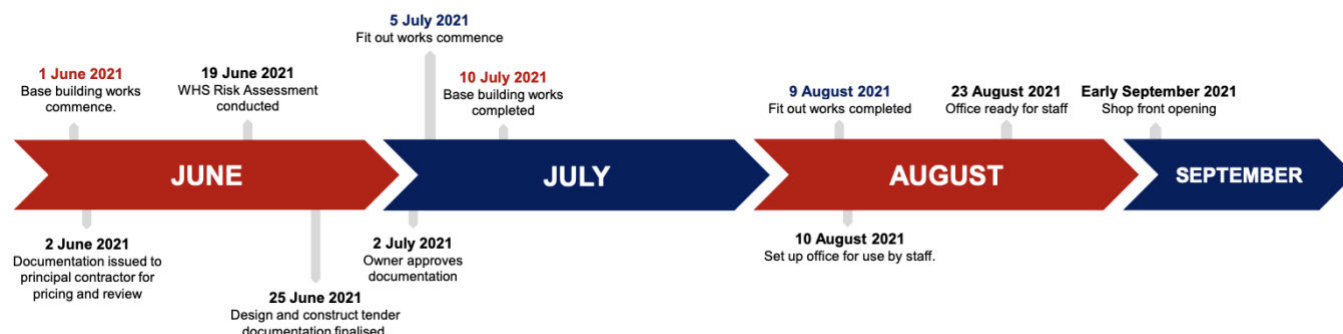
- The REZ will take a number of years to deliver and we want to make sure we support communities understand what the REZ is and what it means for them
- Community feedback so far is that there could be more clarity on what the REZ is and what Government's role is, particularly for wind, solar and storage projects
- We are working on a number of initiatives to improve our messaging and provide better information to the community such as:
 - Supporting community information sessions on hosting energy infrastructure for landowners and supporting training for local solicitors
 - Establishing an on-the-ground presence in Dubbo and attending local events and shows
 - Sending a copy of the 'Renewable Energy Landholder Guide (2019)' developed in collaboration with NSW Farmers to landowners in the transmission study corridor with our next community newsletter
- What issues and information does your local community care about and what more can we do provide information and be accessible?

I note that a community newsletter on the REZ was sent to landowners, residents and businesses in Dubbo, Wellington, Gulgong and Gilgandra. Geographically, the centre of the CWO REZ boundary is somewhere between Dunedoo and Elong Elong – the whole north eastern corner of the REZ was ignored during that “consultation”. Also worth stating is that the community deliberative forums hosted in Dubbo, Wellington and Gulgong included “invited people” – who chose who was eligible or important enough to be included in the “representative sample of local residents and other key stakeholders”? These slides also prove that EnergyCo was aware then, February 2021, that “there could be more clarity on what the REZ is and what Government's role is”. I would speculate that the vast majority of the Australian, and even local CWO REZ, population would have not have heard of a Renewable Energy Zone at that time.

From CWO Regional Reference Group EnergyCo PowerPoint Presentation June 2021:

Dubbo community hub construction timeline

Base building works are expected to be complete by 10 July 2021, with the fit out to be completed by 9 August 2021. It is expected that the earliest the shop front can open is late August 2021 with a potential launch on 2 September 2021.



EnergyCo's Dubbo office did not open until 1st September 2022. On that day then CEO of EnergyCo said in a conversation with Dugald Saunders that the staff in the office will “be able to put things in context which is what people really want is a joined up conversation and EnergyCo is about joining up the conversations that might be had with developers or network operators or other parties and just saying, how does that fit and what does that really mean for me?” He also said “people need to be heard,

there's ways that we can if we hear their concerns do things in ways that take account of what they're concerned about."

From CWO Regional Reference Group EnergyCo PowerPoint Presentation June 2021:

Landowner feedback

Opportunities

- Preference for lines to go along fence lines, on less productive land & away from houses
- Preference for lines to go along the southern edge of corridor
- Preference for use of public land to host new lines

Topics & issues raised

- Impacts to farm operations such as movement of equipment under lines
- Biosecurity requirements (introducing weeds to important crops)
- Impacts to bushfire management
- Health & wellbeing – heart devices, electric magnetic fields (EMF)
- Compensation / impact on market value
- Location of new substation(s) & footprint of generators
- Transmission structure height & visual amenity impacts.



Issues raised in landowner feedback in June 2021 are much the same as the concerns being raised to this day, nearly four years later. Why is there not a process that actively measures and demonstrates that observations, recommendations and potential complications brought to the attention of EnergyCo by landowners and community members are diligently investigated and resolved so as not to rehash the same matters time and time again without adequate solutions?

CWO REZ CRG Meeting Minutes 30th January 2023 – a community representative raised the following query:

- **SE: About 55 people from CWO completed EnergyCo's stakeholder listening survey and asked if EnergyCo finds this acceptable. CI acknowledged the low numbers from CWO and that this would not be highly representative of views in the REZ.**

It would appear that EnergyCo was still conscious of their lack of community engagement in early 2023 – I wonder what has been done since that time to improve awareness and participation in information gathering?

During the EnergyCo Information Session in February 2023 held in Coolah, Mike Young, former EnergyCo Executive Director, Planning and Communities said that he "heard loud and clear" that there was no social license for the CWO REZ transmission project. Chris Swann, then EnergyCo CWO Project Director said "we need to do a whole lot more with the community", "we need to step up". I'd be keen to hear from EnergyCo what changes have been made to increase support for the transmission project and the CWO REZ more broadly, other than the large sums of money that have been dangled like carrots in the name of "community benefits"?

During an online meeting on 22nd September 2023, in which Mike Young was present, I requested an update on the exhibition of EnergyCo's CWO REZ Transmission. Mike's response was that he hoped the exhibition period would begin by the end of the month (September 2023) but that it was a decision that would be made by the Department of Planning. Following that encounter I came across the following Facebook post from a CRG community representative:



Sal Edwards - Concerned CWO REZ Community Member

September 22, 2023 · 🌐

TRANSMISSION LINE PROJECT UPDATE: CWO REZ TRANSMISSION Environmental Impact Statement (EIS) is scheduled to go on exhibition next Thursday 28th September. To view the EIS on or after Thursday, please use the following link. The current status of this project is Prepare EIS. The exhibition will last 28 days. The Community Reference Group (CRG) did request that this exhibition time be extended, with no formal reply received to date.

The next meeting of the CRG is scheduled for the 28th Sep at 10am. As a concerned Community Representative, I posed the following request to EnergyCo and received the below response:

SE request: "I note the new CRG meeting time below, Thursday 28th September 10am, (received Sep 7th), for the meeting that was proposed to be held during the EIS exhibition period. This does tick this box, however only by a matter of hours, as confirmed in the most recent email (Sep 11th) confirming that the exhibition period will commence on the 28th Sep for 28 days. It is imperative that Senior Representatives from EnergyCo attend this next meeting, however only having that morning (pre 10am) to view and read the EIS, does seem an extraordinary, even outlandish suggestion given the likely scope of the EIS document/s.

May I please request an urgent review of this scheduling by EnergyCo for the next CRG Meeting? Might it be possible to meet the week following the publication of the EIS, Oct 5-8th? I understand that with only 28 days on exhibition, this timing is critical."

Response: The CRG will proceed on 28/9/23 to allow Mike Young (Executive Director Planning & Communities) and Christopher Swann (Project Director) to attend in person. The intention of this meeting is to provide a detailed briefing on the EIS in the first instance and further engagement will occur during the subsequent exhibition time frame, including Community Sessions (locations, dates and times are currently being finalised), questions may be submitted to EnergyCo through the CRG process for response and we can also discuss the option of an on-line extra ordinary CRG towards the end of the exhibition if required, as it is totally appreciated that this is a large and comprehensive document that will take time to read/review."

You'll note it is stated that CRG members received an email on 11th September confirming that the exhibition period for the CWO REZ transmission EIS would begin on 28th September 2023. Either Mike Young, in his then position as an EnergyCo Executive Director was not made aware of the timing of such a crucial event which, given the organisation of the upcoming CRG meeting around his schedule is highly doubtful, or he was intentionally withholding information from the general public?

At an EnergyCo Drop In Session regarding the CWO REZ Transmission EIS in Coolah in October 2023, members of the public were made aware that the majority of the EnergyCo community engagement team had been replaced. It is understood that most of those roles were made up of employees of Turnpike Advisory who were engaged by EnergyCo as consultants for the CWO REZ. The explanation given was that the contract under which those positions were held was due for renewal and it was just unfortunate that the exhibition of the EIS was delayed so those two events clashed. While it didn't impact EnergyCo's process, changing the staff who had been on the ground dealing with community in the midst of such a significant milestone for the project was a major obstacle for individuals; in essence it was like starting community engagement afresh, rehashing everything that had already been said, yet the project planning process was still marching on, leaving community behind, again! If contract conclusion was the genuine reason for the change in staff, would it not have been possible to extend the agreement for a short amount of time, given exhibition periods are generally no longer than six weeks, or postpone the exhibition period for a time to introduce the new team members to community and get them adequately educated, in the interest of authentic community engagement?

In January 2024, residents in the Coolah, Dunedoo and Gulgong areas started seeing the below in their social media feeds:

Taverner Research's post

Workshop in Dunedoo - Wednesday 7th Feb

Dunedoo
A Workshop for Growth

Wednesday 7th February 2024

6:00pm - 8:00pm

Central location in Dunedoo (Venue TBA)

Help shape outcomes for the benefit of the community!

REGISTER NOW
Click 'Learn More'

survey.confirmit.com.au

Workshop in Dunedoo -

Learn more

Taverner Research is organising a PAID community workshop in Dunedoo to address a significant local issue, and we are seeking the participation of Dunedoo residents like yourself to help shape outcomes for the benefit of the community! Anyone is welcome to take part.

The workshop will be held on **Wednesday 7th February, 6:00pm - 8:00pm** at a central location in Dunedoo and will run for approximately 2 hours. Catering will be provided.

Participants who attend will be honoured with a **\$100 eGift Card via GiftPay** to thank you for your time and participation.

(GiftPay vouchers redeemable at most retailers/supermarkets and are sent via email 1-3 business days after the workshop. You can visit [giftpay.com.au](https://www.giftpay.com.au) for more information.)

Experienced facilitators will be present to guide the conversation and will create a welcoming and supportive environment. There is no pressure to share more than you're comfortable with, and we value your insights regardless of how much or how little you contribute.

Gulgong
A Workshop for Growth

Thursday 8th February 2024

6:00pm - 8:00pm

Central location in Gulgong (Venue TBA)

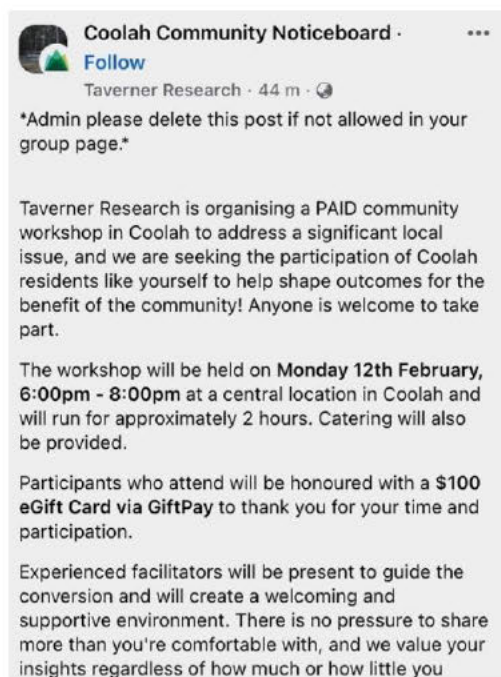
Help shape outcomes for the benefit of the community!

REGISTER NOW
Click 'Learn More'

survey.confirmit.com.au

Workshop in Gulgong Thursday 8th February

Receive \$100 as thanks for your participation



contribute.

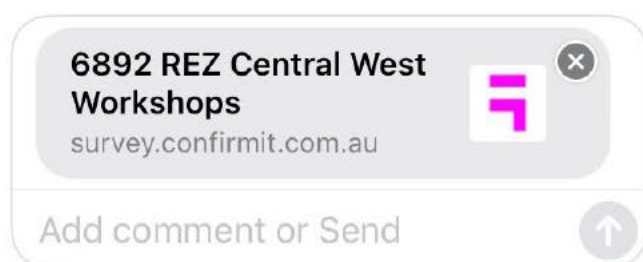
Please message us or comment below if you are interested in attending, we will then send you our registry link.

You can call Macayla Smith (coordinator) on [redacted] if you have any questions regarding the workshop.

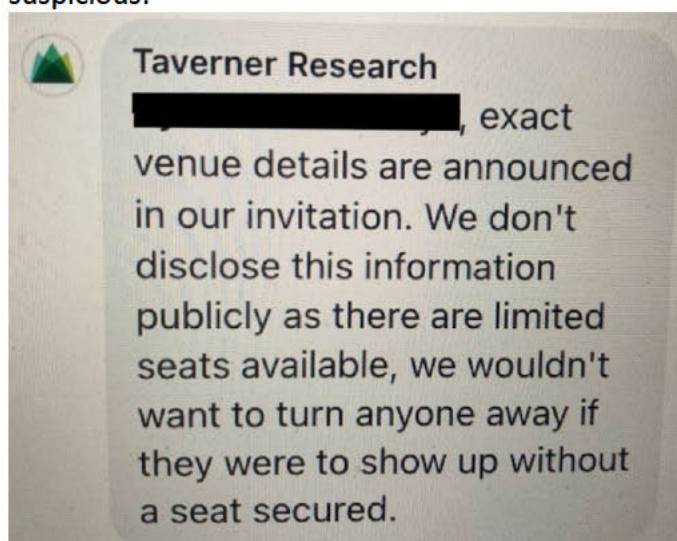
Thank you Coolah residents, we hope to have you involved!



Initially, the subject of this community workshop was not made clear but upon attempting to send the link to others it became a little clearer:



There were some major issues with transparency making the communities involved understandably suspicious:



The following were the qualifying survey questions used to "ensure we have a good mix of participants":

Survey progress: 55%

Thank you. Next are a few demographic questions to ensure we have a good mix of participants.

Into which age category do you fall:

☐ Under 18
☐ 18-29
☐ 30-39
☐ 40-49
☐ 50-59
☐ 60-69
☐ 70+

Survey progress: 73%

With which gender do you identify:

☒ Female
☐ Male
☐ Non-Binary
☐ Other (please tell us)

Survey progress: 82%

Do any of the following statements apply to you: Please select all that apply, or 'None of the above'.

☐ I was born overseas
☐ I identify as an Aboriginal or Torres Strait Islander
☐ I work in agriculture (e.g. farmer, farm supplier)
☐ I have a disability that affects my ability to travel or access public venues and spaces
☐ Prefer not to answer
☐ None of the above

Survey progress: 91%

Lastly, for catering purposes, do you have any dietary requirements?

☐ Yes (please specify)
☐ No

Survey progress: 100%

Thank you for your interest to participate in this important community workshop. We look forward to having you involved!

Please leave your name, best daytime contact number and email address. We will then be in contact to provide you with the venue details and all other relevant information.

By providing this information, you agree that we may process your personal data in accordance with our [Privacy Statement](#). Participation is completely voluntary, if you wish to be considered for this research, please leave your contact details below.

Thank you for registering your interest to take be involved in this important community engagement. We will be in contact again shortly. Please keep an eye on emails from us.

Please click **SUMBIT** to complete.

There was a lot of community uproar following this attempt at consultation. I was told that EnergyCo was trying to attract a broad cross section of people who had unlikely attended any sessions related to the CWO REZ previously; I wonder how that made those who had volunteered their time to attend previous drop in and information sessions feel? Apparently the research partner EnergyCo engaged to conduct this body of work suggested that advertising the workshop as REZ related may bias the attendance. To their credit EnergyCo cancelled these sessions, albeit without much warning, but replaced them with drop in sessions without consulting the community about how they would like to be engaged – did they learn nothing?

Community consultation is, to me, meant to be a process in which those responsible for the development of projects take local feedback on board and attempt to provide material change or adequate mitigation of potential impacts for the good of the negatively affected community. The Merotherie Energy Hub has been named as such since my earliest memories of the CWO REZ transmission project. I believe community members have been requesting that name be changed throughout the whole consultation process (personally, my first documented request was during the EIS exhibition period in October 2023) due to the distress it has caused the local family who own the property “Merotherie”. I have raised this issue at nearly every meeting and drop in session I have attended and regularly contacted EnergyCo regarding this matter but, to this day, do not have a definitive response (see screenshot below and email [EnCo 04](#). under correspondence).

Response from Ash Albury 8th March 2024 via email:

19

10 **Email to Thomas Watt (7 February 2024)**

Community has requested the energy hub near Birriwa to have its name changed and despite assurances that would happen we are yet to see it happen. Merotherie is a property name and having EnergyCo use that name without permission has been a challenge for the family who own Merotherie.

This request is acknowledged. EnergyCo is currently reviewing this further and will provide more information if and when a decision has been taken.

To my mind, this started out as a simple request from the community and EnergyCo's refusal to take action in early planning has made change much more challenging. Using an alternate name seems to me like a simple gesture that had the potential to garner good faith with the local community, yet the opportunity was not taken.

Another example of poor community consultation can be found in the below response from Ash Albury 8th March 2024 (my issue in the left column, response on the right):

I attended the drop in session held in Dunedoo on Monday 26th February. One of the biggest concerns that came out of that session was the lack of note taking from EnergyCo staff when speaking with community members. There was a lot of important information being shared during a group conversation with Thomas Watt shortly after the session began and the amount of information could not have possibly been retained adequately, yet to my knowledge there was no note taking happening. Thomas informed us that there would be a report compiled following the drop in sessions that would be used to advise Minister Sharpe. How can community members be assured their feedback is being adequately represented to the Minister?

~~Relevant communities and concerns to the project development~~
In relation to the second part of your email, I have discussed with Thomas the session, including the part of the session when you and other attendees that arrived when you did were asking him a series of questions broadly about the REZ. He has advised that as much of the line of questioning taken from the group at this stage of the session was not related to the purpose of the session (i.e. community and employment benefits), it was not documented.

After this initial line of questioning, and as part of discussions with individuals or smaller groups (ie. 1-3 people) after the break, relevant ideas and priorities were captured, such as attracting new manufacturing to the town, retaining and attracting workers and their families and programs to support local communities connect and social outcomes. All feedback has been recorded and will be reported as part of a 'what we heard report' to be published once the program is open.

Is good community engagement restricting topics that can be spoken about at certain information sessions? Should records not be taken of all questions and feedback regarding the project under consideration? How can community members be assured the time and effort taken, voluntarily, at any information session has been conveyed to the appropriate team member and/or department for analysis? Is the process broken and therefore futile?

The following quotes were taken from EnergyCo's 2025 Lookahead Webinar:

"What can you expect from EnergyCo? We engage early and throughout the project, we respect and value community feedback, we strive to understand local needs, to deliver our projects in a strategically planned and considered way, we provide clear and timely information, we actively listen and answer questions thoroughly, we offer support, including mental health services, we work with local and Aboriginal communities to deliver benefits and job opportunities."

I could not disagree any more with the above. Whilst everything said is how the REZ's should be rolled out, how information should be shared, how landowners and community members should be treated, how feedback should be handled and the support that should be offered to affected communities. As previously mentioned, if the CWO REZ process was administered as advertised I believe the outcomes would be far more positive.

It is my opinion that community consultation and engagement has been lacking throughout the whole Renewable Energy Zone planning and implementation, both under TransGrid and EnergyCo. The lack of publicly available, locally advertised and widely circulated material in the early stages of the REZ model suggests an intention of keeping impacted communities in the dark. The secrecy, deception and evasiveness of EnergyCo employees, contractors and consultants toward community members and landowners has not fostered a positive relationship within the CWO REZ, nor any good faith. Sending community liaison staff to drop in sessions and meetings who know less about the project than the local landowners and community, who promise to "take questions on notice" and respond to those who raised the queries without follow up action, and who have no power to change anything anyway is a complete waste of time. There is much mention of "key stakeholders" being involved in decision making; it seems farmers and other rural community members have never been considered under that

umbrella. The millions of dollars of funding thrown at “host” communities cannot, and should not be used as an attempt to, buy support for the REZ rollout; finance does not adequately address all of the potential negative impacts, and will create a short term boom before what I predict will be a huge bust. Rural and regional communities thrive on collaboration and unity of volunteer organisations; I fear the money will bring short term benefits but prove detrimental in the long term due to fractured community relations.

The CWO REZ being the “pilot REZ” means, if the “rapid transition to renewable energy” must proceed, there is still time for worthwhile and practical change to be implemented to include and value feedback and knowledge from impacted landowners and community members in the very early stages of project design. Unfortunately, what I have heard from our fellow REZ inhabitants in the New England, and those directly impacted by other transmission projects is EnergyCo’s mode of operation has not altered – yet another example of feedback not being considered or respected.

CWO REZ Transmission Route & Siting of Major Infrastructure

The Following can be found on EnergyCo’s website under “Land and easement acquisition and compensation”:-

“Finding the best route

Here's what we aim for when picking a path for the lines:

- **Stay away from cities and towns:** We avoid population centres to minimise impact on people
- **Space around homes:** We keep the lines as far from houses as possible
- **Share the land:** When crossing farms, we try to avoid prime farmland and important farm buildings so farmers can keep working
- **Use already disturbed land:** We look for areas already disturbed that can be used
- **Minimise clearing:** We try to choose paths that need the least amount of trees and plants cut down
- **Protect special places:** We avoid areas important to Aboriginal people and endangered wildlife
- **Keep water clean:** We avoid rivers, lakes, and streams to protect water quality
- **Build it right once:** We plan carefully to avoid needing to make changes later”

(NB: any errors in the above are EnergyCo’s – this has been copied and pasted)

Whilst the CWO REZ transmission route has been designed to avoid cities and towns does this commitment suggest the rights and needs of those living rurally are less than those living in more densely populated areas? There are several instances within the CWO REZ transmission project where lines are proposed a short distance from homes, and despite landowners best efforts to have them moved further away (in most cases not saying no outright, instead providing alternate options) there has been no joy; in one case EnergyCo have committed to building a family a new home due to the impact of the lines and another landowner was, last I heard, attempting to achieve a similar agreement. There are many cases of valuable farmland and important farm infrastructure being impacted by the transmission project route; in such situations EnergyCo must move the aforementioned infrastructure, more cost to the taxpayer and disruption to the landowner. There are numerous streams, creeks and rivers impacted by the CWO REZ transmission project including the impacts to the Talbragar River system and flood plain from the road upgrades needed to access the main energy hub.

The following was sourced from the CWO REZ CRG April 2023 Meeting Minutes:

<p>Conflicting Maps of Corridor: Having had conflicting maps of corridor location online and on the iPad at Community Info Sessions, could EnergyCo please step out the communication process and timing of communications in regards to potential acquisition for landholders that may have been included on those maps?</p>	<p>Consultation with affected landowners has been ongoing since early 2022 when EnergyCo announced a revised study corridor for the REZ transmission project. EnergyCo initially contacted landowners via letter, with subsequent engagement being managed via our dedicated Land Acquisition Managers based in the region.</p> <p>In the scoping report released in September 2022, there was a deviation in the corridor in the vicinity of Ulan Road at Turill. The most up to date version of the study corridor was presented in the maps shown at EnergyCo's September information sessions and on our online interactive map. This amendment was done to align with the previous alignment planned by Tilt Renewables for the development of the 330kV transmission line to the Liverpool Range Wind Farm. EnergyCo's land team contacted impacted landowners prior to the scoping report being released. <u>It is important to note that the corridor has been subject to ongoing development and refinement since this time and there may be further changes as a result of ongoing design investigations and landowner consultation.</u></p> <p><u>We expect to begin the process of acquiring transmission easements over the coming months (Q2 2023). This will include issuing opening letters to affected property owners as the first step in the formal acquisition process.</u></p> <p><u>The final transmission route will be presented in the Environmental Impact Statement which is planned for public exhibition in Q3 this year. The alignment will take into account a range of factors, including landowner feedback, distance to dwellings, geography, design constraints, environment and other impacts.</u></p>
---	---

The above states that the "final transmission route" would be presented in the Environmental Impact Statement, and given that is the only chance the broader public had comment on the project it is very disappointing that wasn't the case. It is even more distressing that the compulsory acquisition process begun prior to the route being finalised; all due to the hasty nature of the rollout in an attempt to meet the promised targets.

The following was sourced from the CWO REZ Project Overview February 2022:

The Energy Hubs are proposed for localities close to major planned wind and solar developments. EnergyCo is working with prospective generators to coordinate impacts and ensure that transmission lines are built in an orderly manner. Each Energy Hub will occupy up to 50 hectares plus a buffer.

It needs to be known that the previous owner of the majority of the CWO REZ transmission main energy hub site was originally prepared to lease/sell the amount of land required for the hub, what they thought was a simple sub-station, on the proviso that the rest of the property could continue to be farmed as usual. That offer was taken advantage of and when EnergyCo decided the whole property was required to "host" infrastructure, the compulsory acquisition card was played; the threat of legal battles and a potential loss of income and capital led the landowner to 'voluntarily' sell the site to EnergyCo. From CWO REZ CRG Meeting Minutes 28th September 2023:

Given that the previous owner of the land suggested the northern block (the square block marked as DP854876 in the above map), where the generational family home is located, be excluded from the energy hub design, and remain as a farming operation under their control, an option rejected by EnergyCo, I wonder what that land will now be used for? Would a less hasty, better investigated and more collaborative design process have prevented such a huge upheaval for a family with such history with the subject land? How did the original need for 50 hectares end up with EnergyCo purchasing over 650 hectares of valuable food and fibre producing land to host energy infrastructure in this one location?

I would be interested to know at what point the assessment was made that the aforementioned site was suitable for the main energy hub given access is via a road traversing a 1.7km flood plain. The original design called for Merotherie Road to be “flood proofed” so there would be all weather access to the energy hub and accommodation facility. Upon further investigation this was found to be unfeasible which has led to the current design which I believe will still result in enormous negative impacts for both local landowners and the Talbragar River system as a whole. Issues regarding Merotherie Road are touched upon in my EIS objection and will be elaborated on later in my submission. The inappropriateness of the site has been a subject of contention since the configuration was publicly released, and to this date there are no firm plans on how to evacuate the possible 1200 workers from the site in an emergency, yet on the project marches.

I believe it is important to highlight the communication as we, members of the impacted communities, have received it and how it has been construed regardless of the potential inaccuracy. The below are pages that can be viewed in EnergyCo’s NSW Network Infrastructure Strategy (NIS) – A 20 year strategy to transform the NSW electricity network published in May 2023:

1.2.1 Central-West Orana REZ

Central-West Orana is one of two REZs with large generation potential and good access both to quality renewable resources and to the existing electricity network. It was formally declared on 5 November 2021, with an intended network capacity of 3 GW.⁸ However, the Consumer Trustee’s modelling for this Strategy suggests that significantly more network capacity will be needed than intended in that original REZ declaration.

To meet the declared, modelled and potential long-term needs of the CWO REZ, the Strategy proposes the network arrangements laid out in Figure 7:

• **Deliver Now.** 4.5 GW capacity by 2027/2028, delivered by new 500 kV lines connecting a new hub at Merotherie to the existing network at Wollar, with 330 kV extensions to Elong, Ungunla and Uarby West and East, and a possible expansion to Uungula.

• **Secure Now.** An additional 2.3 GW capacity by 2038, delivered by upgrading the Merotherie–Elong Elong lines to 500 kV, with an extension to Burrendong and upgrade in the Mt Piper area (off-map).

• **Plan for the Future.** An additional 3.5 GW capacity if needed, delivered by utilising the Merotherie–Elong Elong line to its full capacity, with extensions to the Gilgandra–Toraweenah area and Stubbo.

The options proposed would deliver the needed capacity while reducing the number and duration of interruptions to local communities, offering flexibility if new capacity in a REZ is needed sooner than anticipated, and allow for greater competition for access rights through LTESA tenders, bringing delivery and cost benefits to NSW electricity consumers.

The high-level detail and rationale for each of the Network Infrastructure Options are set out below, along with their development status and next steps. Further detail is given in Appendix B.

CWO REZ Deliver Now

All modelled scenarios indicate that at least 4 GW network capacity would be needed as early as possible and no later than 2033: see Figure 8 point A.

To meet these requirements, EnergyCo proposes Option 1A, a new transmission spine for the CWO REZ that would add 4.5 GW capacity, delivered by 2027/2028. This option is comprised of:

- two 500 kV double circuits between Wollar and Merotherie, and
- new 330 kV lines to new energy hubs at Elong, Uarby East and Uarby West
- Subject to further analysis, CWO REZ may be meshed with Line 79 at Ungunla to increase transfer capacity and deliver additional system benefits. Further augmentations to CWO REZ may be revised.

Option 1A replaces Options 1 and 2A from the Draft Strategy, which together delivered only 4 GW. The new Option 1A efficiently delivers additional capacity due to an additional 1,500 MVA transformer that has been added at Elong Elong. The Uarby East and Uarby West hubs replace the single Uarby hub in the Draft Strategy, reflecting constraints identified by local communities and practicalities in adding future capacity, and noting that these two extensions are dependent on access right holders. Further refinements to the CWO REZ scope may occur before EnergyCo, as Infrastructure Planner, makes a recommendation to the Consumer Trustee for authorisation.

Option 1A adds capacity at a cost comparable to the previous Options 1 and 2A from the Draft Strategy and Draft 2023 IIO Report. The resulting overall cost estimate of \$3.2 billion is within the ±50% accuracy band. It also better enables future expansions without repeated community and landholder impacts (final Access Fee arrangements will determine how costs related to the two Uarby hubs may be recovered from energy suppliers).

Note that the previous CWO REZ cost estimates were published by AEMO about 4 years ago as part of the 2020 ISP process. These are now out of date. The underlying project and, as a result, costs have changed for three key reasons. Firstly, EnergyCo had to add an additional double circuit to meet the ‘N-1 secure’ operating requirement. Secondly, EnergyCo had to move the originally planned transmission corridor to avoid negative impacts on the Merriwa–Cassilis communities and prime agricultural land. And thirdly, EnergyCo increased the overall project size to deliver sufficient hosting capacity pre-2030, create optionality beyond 2030 and share community impacts more evenly between CWO and NE REZ.

To enable CWO REZ to export more than 3 GW to the key demand centre, Stage 1 of the Hunter Transmission Project (HTP) will also have to be in place: see section 1.3 below.

CWO REZ Secure Now

The modelling indicates that at least another 1.5 GW of additional network capacity may be needed after 2033, if there is either transmission delay or early coal exits: see Figure 8 point B.

To achieve this and support LDS projects that would deliver broader consumer/network benefits, EnergyCo proposes three options to add 2.3 GW of network capacity at low cost.

- Option 2B would upgrade the 330kV lines between the Elong Elong and Merotherie hubs to 500kV, adding 1.5 GW of network capacity and optionality to cater for early coal closures and other uncertainties. Although this option could unlock 3 GW of network capacity, it will be limited to 1.5 GW until a further augmentation is made to the downstream shared network.
- Option 5A would expand the network south from Ungunla towards Burrendong to add 0.8 GW network capacity and support up to 500 MW of LDS projects.
- Option: Pumped Hydro Near Bathurst would reinforce the existing line between Bathurst and Mt Piper, supporting up to 325 MW of additional LDS capacity, delivering network security and reliability benefits in the CWO REZ.

As Infrastructure Planner, EnergyCo may consider these Secure Now options, and their potential inclusion as Deliver Now, as part of the scope for network projects recommended to the Consumer Trustee for authorisation, subject to community, cost and environmental considerations.

CWO REZ Plan for the Future

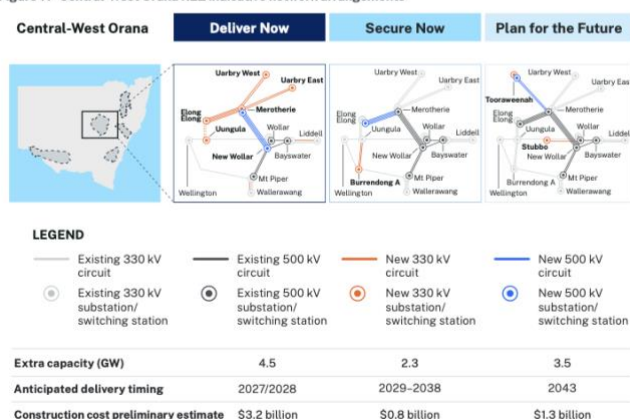
Modelling of the Coal Exit by 2030 and Strong Electrification scenario suggests that the CWO REZ may require an increase up to a total 9 GW capacity by 2043 if there is also strong demand from electrification: see Figure 8 point C.

To achieve this if needed, EnergyCo proposes the following options to augment the capacity provided under earlier options:

- actualising the latent 1.5 GW of capacity delivered under Option 2B, with further augmentation downstream in the existing network
- Option 3A, a 500 kV expansion from Merotherie to a new hub in the Gilgandra–Toraweenah area and adding 1 GW capacity, and
- Option 4, a 330 kV expansion from Wollar to a new hub at Stubbo also adding 1 GW capacity.

If any of these options were implemented to take the CWO REZ network capacity beyond 6 GW, new augmentations downstream in the existing shared network would be required.

Figure 7: Central-West Orana REZ indicative network arrangements



Estimates are Class 5b accuracy (i.e. ±50%) and for development and construction costs only (excluding finance, generator connection and system strength costs). This provides a comparable basis with estimates for projects under the National Electricity Rules. The total cost for a REZ also includes finance, generator connection and system strength costs at typically an additional 70% to 110% of development and construction costs. Generator and storage proponents that hold access rights will contribute connection and system strength costs. All values are in real 2021 Australian dollars.

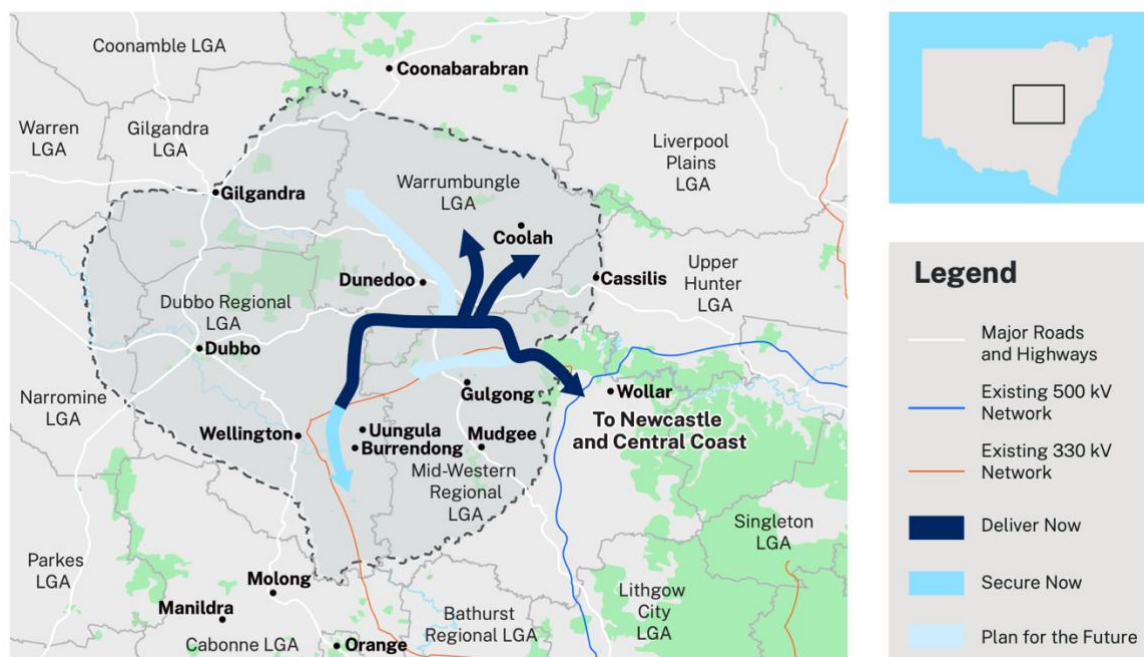
Deliver Now network configuration is subject to review and refinement as part of detailed design review, Network Operator tender and the authorisation process.

The above states that “Central-West Orana is one of two REZ’s with large generation potential and good access both to quality renewable resources and to the existing electricity network. It was formally declared on 5 November 2021, with an intended network capacity of 3GW. However, the Consumer Trustee’s modelling for this Strategy suggest that significantly more network capacity will be needed than intended in that original REZ declaration.” It then goes on to state that the “deliver now” model is 4.5GW capacity by 2027/2028. How is it possible that EnergyCo’s Network Infrastructure Strategy, published in May 2023, has modelled the “deliver now” design for 4.5GW capacity when at that stage the REZ declaration amendment had not been on exhibition nor approved by the Minister, meaning the CWO REZ then had a capacity of 3GW? It seems the declaration amendment for the CWO REZ was a fait accompli and community sentiment would never have even been considered!

Another intriguing thing to note is the “deliver now” model in figure 7 depicts the transmission lines between Merotherie and Elong Elong as new 330kV circuit and the “secure now” model shows that same section as new 500kV circuit. As a community member I have never seen the proposed transmission lines between Merotherie and Elong Elong exhibited as 330kV, always 500kV – another reason to wonder if the plan for the CWO REZ was always a capacity of 6GW?

Another screenshot taken from the NIS (May 2023):

Central-West Orana REZ



This indicative map has put Central West farmers and landowners under a cloud of uncertainty, suspicion and tension – who will be the next group of landowners unlucky enough to have a line drawn on a map over their property, be contacted by EnergyCo and face compulsory acquisition?

In an ideal world the lessons learnt from the rollout of the Central West Orana REZ would inform a much improved model of collaboration during early design and transparent and honest communication between landowners, EnergyCo, the network operator and other necessary Government authorities. Unfortunately, in the haste to transition the NSW electricity network we are seeing the mistakes that have significantly delayed, and caused major cost blowouts, within the CWO REZ constantly repeated causing distress and devastation all over the state. Irrespective of if the “transition to renewable energy” is the most cost effective, reliable and efficient way to power the nation, the rollout has been a complete and utter shambles to date.

Treatment of Transmission Affected Landowners

As previously mentioned, hearing about EnergyCo's treatment of transmission affected landowners is what got me heavily involved in educating myself and others about the Central West Orana REZ, and the broader "rapid transition to renewable energy". I have no doubt this inquiry will be bombarded with almost unbelievable tales of subterfuge, secrecy and bullying but below are a few examples that were recounted to me by affected landowners themselves in the last quarter of 2023, during "consultation" around the final transmission route.

1. One landowner, with a 330kV transmission line supposedly running along their boundary (not that they know because they can't get a map!), was told by an EnergyCo employee that if they're too hard to deal with the transmission lines would be placed over the fence, off their property, so they would still look at them but not be eligible for any compensation through the Strategic Benefit Payments Scheme.
2. A landowner is being told they will have 250 trees removed from their property to make way for a 330kV transmission line. Some of these trees survived the Sir Ivan Bushfire in 2017 and a proportion of the rest have been planted since. The line is currently proposed 100m from one of their houses and will impede their farming activities as their current farming equipment will not be permitted to travel under the lines. It is proposed that the transmission line will cross countless fence lines, including 8 laneway crossings (where farming equipment currently travels to avoid traversing public roads).
3. A farmer has two 500kV and one 330kV transmission lines proposed to run directly through the middle of his approximately 600 acre property. The lines, within a 240m easement, are proposed to go directly over most of the farm infrastructure (cattle yards, shed etc), take out numerous trees and a regeneration area, potentially exacerbating salinity issues, and effecting contouring put in place to minimise erosion. The landowner proposed two alternate routes, the first was flatly denied and the second is awaiting a response (later denied).

The first EnergyCo contractor that set foot on the property said it was to mark out boundaries, yet when they left there were pegs marking the easement line; they did not have permission for that!

4. A small landholding is set to lose nearly 20% of their land to transmission lines. The proposed route takes out a dam, the only water source for one 90 acre paddock, and 60 shade trees rendering that paddock useless for stock.
5. A mixed farmer is most concerned about the lack of transparency and consultation from EnergyCo. There are two, parallel, existing transmission easements that run about 800 metres from the homestead. The landowner was led to believe the CWO REZ transmission line would be installed alongside the existing infrastructure, however, the farmer noticed that contractors sent to carry out initial survey works were inspecting land much closer to their house, away from the current easement. When questioned about the positioning of the new transmission lines the farmer was told there were no firm plans in place which turned out to be untrue. He has repeatedly asked for the proposed line to be moved further than the current 240m from his relatively new home; the site of which had been thoroughly investigated before being built on, but to no avail (even following a phone call from an EnergyCo employee saying the line would be moved further from the homestead which was retracted by another staff member citing the previous statement as being unauthorised). EnergyCo employees showed the landowner photomontages of the proposed lines in mid September but were told they could not keep copies until after the Environmental Impact Statement was released. This farmer also provided an alternate route to EnergyCo which was denied.

As you can imagine, transmission affected landowners are frustrated, stressed, tired, fed up and irate after being treated like mushrooms (kept in the dark and feed sh*t) for over three years, some more. There were a number of landowners who learnt that their properties were within the 'study corridor' when a map was emailed to them or sat on their kitchen bench by an EnergyCo representative after a cold call requesting a meeting. Initially, those that were reluctant about "hosting" such large scale infrastructure were told other landowners, in sections of the proposed transmission lines further away, were "on board" and "happy" with the proposal which, following discussions down the track was found to be a complete fabrication. In the early stages landowners were shown indicative maps of the study

corridor and/or route on their property but were not permitted to keep a copy, or even take a photo; a couple of misplaced papers proved not all landowners were being shown the same route.

The trump card for EnergyCo has always been compulsory acquisition. It was rolled out in most cases at the very first landowner meetings. Former EnergyCo Executive Director, Planning & Communities, Mike Young, once told me that Land Acquisition Managers were being upfront and honest by informing landowners of EnergyCo's power to compulsorily acquire land if there wasn't an agreement reached within the allocated time frame, not using the threat to bully individuals into agreement as it was construed by the transmission affected landowners.

Throughout the landowner "consultation" phase of the CWO REZ transmission project landowners have reported a merry-go-round of land acquisition managers making continuity of information an issue and contractors engaged by EnergyCo entering properties without permission and conducting unauthorised activities on properties with access granted. Should there be a duty of care to affected landowners, making a level of protection mandatory so as not to cause such angst and suffering? Is unlawful entry and non-consensual works being carried out acceptable practice for a Government authority?

CWO REZ Transmission affected landowners were issued their Opening Letter on the 24th May 2023. Some landowners had previously discussed alternate routes with EnergyCo staff yet the opening letters reflected the original transmission design exacerbating the stress of the process. The majority continued to negotiate with EnergyCo regarding the potential for alternatives, some waiting months before receiving confirmation of the rejection of their counter proposals – time they didn't have given the six month compulsory acquisition clock started ticking upon receipt of the Opening Letter.

The pre-PAN advice letters were distributed to CWO REZ transmission affected landowners on 8th November 2023 and the Proposed Acquisition Notice (PAN) was issued on the 8th December 2023. Many landowners and community members raised the insensitive and frankly, reprehensible timing of the delivery of such a document – during harvest, one of the busiest times of the year for farmers, and not three weeks before Christmas effectively limiting the potential negotiation period (most law firms close prior to Christmas and have limited staff until the end of school holidays in late January or early February), and causing angst during what should be a joyous time spent with family. While EnergyCo employees took a couple of weeks off to spend with their families, celebrate the festive season and bring in the New Year, transmission affected landowners, and their families spent that time fretting over decisions that could change the course of their lives and businesses thereafter. I can attest to the toll the stress and anguish of the threat of compulsory acquisition has on individuals, families and businesses given my aforementioned experience with the then RMS.

Landowners were initially given until 15th March 2024 to come to a mutual agreement with EnergyCo or have the easement on their land compulsorily acquired (following the meeting with Minister Sharpe I understand affected landowners who hadn't come to an agreement were given a small extension). What I understand wasn't made abundantly clear was that the PAN was only for the temporary easement for construction of the transmission lines, not for the permanent easement so many landowners signed agreements, under duress due to the pressure of being threatened with compulsory acquisition, without realising they had the option to continue negotiating with regard to the permanent easement. Landowners were also advised that their compensation would likely be severely diminished if they did not sign a voluntary agreement with EnergyCo.

From CWO REZ CRG Meeting Minutes 26th March 2024:

- DT commented on a land owner affected by the power line complaining about bullying tactics. Suggesting that it was better to work productively with land owners. AA responded that they are working on improving how they are doing things; explaining they are bound by the Just Terms Compensation Act.

Ash Albury, EnergyCo Executive Director, Planning and Communities, states above “they are working on improving how they are doing things”. I interpret that as an admission of guilt with regard to EnergyCo’s use of bullying tactics toward transmission impacted landowners. Who has been held accountable for such behaviour, and what was the punishment? Have affected landowners been issued an apology and/or additional compensation for harm caused? Could a voluntarily agreement be deemed legally void if a landowner signed under duress due to the actions of EnergyCo employees/consultants?

On the 28th September 2023 I was invited to attend a meeting between a transmission affected family and Mike Young on a property near Birriwa, NSW. This meeting had been a long time coming for the landowners who had been proposing alternate options for the two 500kV and one 330kV transmission lines slated to traverse through the centre of their property for some time without response from EnergyCo. When it was suggested that it would be productive and appreciated to see then EnergyCo CEO, James Hay, on the ground in the CWO REZ liaising with affected landowners Mike said it was unnecessary as he had a lot of power to make decisions. In the next breath, after I believe he informed the landowners that one alternate route they had proposed would not be viable, and they became understandably frustrated, he stated that it wasn’t fair to shoot the messenger; quite the contradiction to his previous statement!! We continued the conversation trying to work through the landowners issues with the lines effectively cutting the property in half and the impacts on moving machinery around the farm – especially the potential issue of not being about to get the header under the lines to harvest half on half of the property. Mike’s response to that was the country we were standing on looked much more suited to grazing than cropping so he didn’t understand why it was an issue. You can imagine our disbelief at that statement, especially considering there was a crop growing right near where we were standing, on the ‘wrong’ side of the proposed transmission lines. When we attempted to discuss the potential impacts of bushfires and the possible restrictions to fire fighting, Mike explained to us that discussion around those matters were irrelevant because high voltage transmission lines do not ignite fires or impede fire fighting efforts – another frustrating moment for the landowners. Toward the end of our meeting the landowners attempted to gain assurance of a timeline for a response from EnergyCo regarding their second alternate route, the reply was that there was no guarantee that they would have an answer prior to the end of the EIS exhibition period.

A video presentation illustrating the impacts of the proposed 330kV transmission line through the property “Wirroolga”, Cassilis - <https://www.youtube.com/watch?v=sbwbK0SbBMA>

This is the clearest representation of the potential repercussions of the transmission infrastructure I have seen to date, and it was commissioned by the landowner. Imagine if EnergyCo had the foresight or willingness to show landowners what their properties will look like post construction – not only through photomontages (where vegetation is left under transmission towers and lines not portraying an accurate outcome), but a virtual tour showing the real impacts.

Regrettably, you won’t have to look far to find similar stories of bullying, deceit, disrespect and trauma with regard to transmission and large scale renewable energy infrastructure being rolled out across Australia. Projects like VNI West, Energy Connect, HumeLink and transmission linked to Renewable Energy Zones are all causing issues for farmers and communities affected.

A few examples:

How Renewables Harm Our Farms & Cost the Earth - Dollars & Destruction Documentary
- <https://www.youtube.com/watch?v=WfEUZotRyLI>

‘Battle for survival’: Peta Credlin investigates ‘devastating’ renewables projects in her hometown
- <https://www.youtube.com/watch?v=dx93N3bJt2Q>

‘Renewable Energy Zone transmission lines in NSW Central West to go ahead, despite community concerns’

- <https://www.abc.net.au/news/2024-06-27/renewable-energy-transmission-lines-go-ahead-central-west-nsw/104028854>



Dead sheep, locked gates, police complaints in high-voltage battle

Farmers along a new 'energy superhighway' say they have been thrust into a world of pain as Victorian landholders vow to lock their gates.



'They've blackmailed me': Farmer's fury over forced land acquisition

Farmers whose land is being forcibly acquired to build energy transmission lines are accusing a NSW government authority of using "blackmail tactics".

CWO REZ Transmission Affected Landowner Survey

I created the below survey in early February 2024 in an attempt to better understand the feelings of CWO REZ Transmission affected landowners; it seemed that no one else was ever going to ask them, and community members and landowners were often being told by EnergyCo staff and our elected representatives that the majority of transmission affected landowners were "happy with the project" and/or were "willingly agreeing to host the transmission infrastructure".

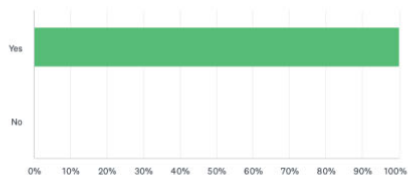
Although it may seem like a small number of landowners responded (approx. 15% of those affected by the CWO REZ Transmission project) and EnergyCo would no doubt question the "representativeness" of the group, I believe it gives good examples of the landowners' perception of the process and their personal experiences, which speak for themselves.

Of particular note is that two thirds of landowners didn't believe they had been adequately consulted regarding the transmission project and that eleven out of twelve landowners rated their experience with EnergyCo up until that time as satisfactory (4) or very unsatisfactory (7).

The comments provided in response to question 8 are also particularly interesting. There are many common themes highlighting a lack of consultation, poor compensation, a lack of planning and due diligence, secrecy and the scarcity of information sharing.

Q1 Have you received a Proposed Acquisition Notice (PAN) in regard to an easement for the proposed CWO REZ transmission project?

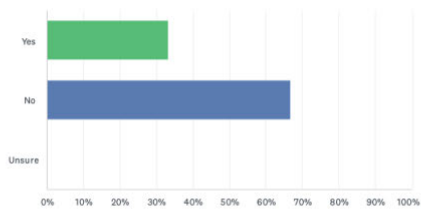
Answered: 12 Skipped: 0



ANSWER CHOICES	RESPONSES
Yes	100.00% 12
No	0.00% 0
TOTAL	12

Q2 Do you feel that you have been adequately consulted regarding the CWO REZ transmission project?

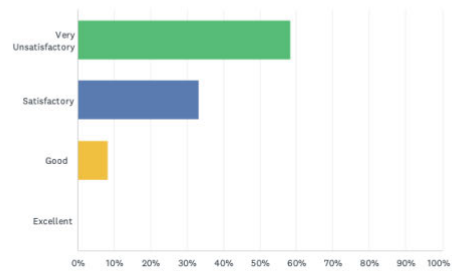
Answered: 12 Skipped: 0



ANSWER CHOICES	RESPONSES
Yes	33.33% 4
No	66.67% 8
Unsure	0.00% 0
TOTAL	12

Q3 How would you rate your experience in dealing with EnergyCo staff to date?

Answered: 12 Skipped: 0



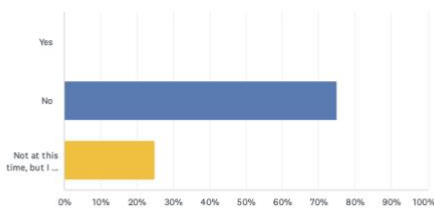
ANSWER CHOICES	RESPONSES
Very Unsatisfactory	58.33% 7
Satisfactory	33.33% 4
Good	8.33% 1
Excellent	0.00% 0
Total Respondents:	12

#	OTHER (PLEASE SPECIFY)	DATE
1	Whilst EnergyCo have appeared to visit and 'consult' with us over the last three years, our problem lies in the belief that the consultation has not been genuine as no planning outcomes have changed. We feel we have not been listened to and that our knowledge of our farm, our business and all its complexities has been totally disregarded.	2/11/2024 2:18 PM

Q4 Have you signed an agreement with EnergyCo regarding the proposed easement on your property?

Answered: 12 Skipped: 0

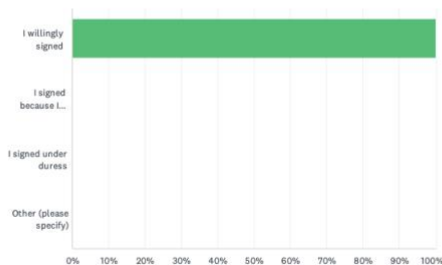
1 / 6



ANSWER CHOICES	RESPONSES
Yes	0.00% 0
No	75.00% 9
Not at this time, but I am planning to	25.00% 3
TOTAL	12

Q5 If you have signed an agreement with EnergyCo, how best describes your willingness to do so?

Answered: 1 Skipped: 11



3 / 6

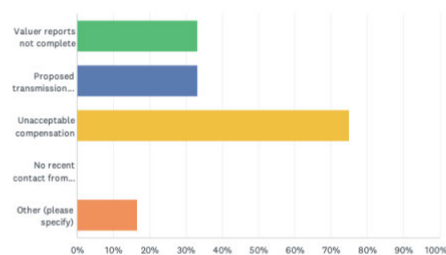
2 / 6

ANSWER CHOICES	RESPONSES
I willingly signed	100.00% 1
I signed because I didn't know what else to do	0.00% 0
I signed under duress	0.00% 0
Other (please specify)	0.00% 0
TOTAL	1

#	OTHER (PLEASE SPECIFY)	DATE
	There are no responses.	

Q6 If you haven't signed an agreement, what is stopping you?

Answered: 12 Skipped: 0



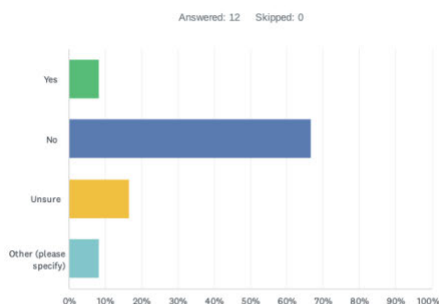
ANSWER CHOICES	RESPONSES
Valuer reports not complete	33.33% 4
Proposed transmission route not acceptable	33.33% 4
Unacceptable compensation	75.00% 9
No recent contact from EnergyCo	0.00% 0
Other (please specify)	16.67% 2
Total Respondents:	12

#	OTHER (PLEASE SPECIFY)	DATE
1	whole premise is unacceptable.	2/12/2024 10:00 PM
2	Waiting for solicitor to view	2/11/2024 10:58 AM

Q7 The CWO REZ is the first REZ being rolled out in NSW. Stage One of the CWO REZ transmission project is critical to the state's

4 / 6

progression of the "rapid transition to renewable energy". Do you feel confident that you can negotiate adequate compensation for your easement, in direct proportion to the significance of this transmission line?



ANSWER CHOICES	RESPONSES
Yes	8.33%
No	66.67%
Unsure	16.67%
Other (please specify)	8.33%
TOTAL	12

#	OTHER (PLEASE SPECIFY)	DATE
1	Tax implications???	2/11/2024 2:18 PM

Q8 Any other comments?

Answered: 8 Skipped: 4

#	RESPONSES	DATE
1	All totally unnecessary - if we are forced to take the \$\$ we will use it for a legal challenge.	2/12/2024 10:00 PM
2	Compensation does not take into account the full impact of the project on the loss of value to the whole property (not just where the easement is situated) As it is the first of its kind how are we expected to predict the true impact over the life of the project	2/12/2024 6:36 PM
3	energy co lack of consultation, lack of planning, secret squirrel service, couldn't give a fuck attitude bend over a barrel with a gun to your head waving compulsory acquisition at you sh	2/11/2024 9:45 PM
4	EnergyCo have no meaningfully information to provide to affected landholders. The	2/11/2024 3:50 PM

5 / 6

unrealistic deadlines have been set by government which is pressuring landholders to sign without any clarity or meaningful information. The roll out of this project is a basket case, no due diligence or long term planning.

5	We have so many issues with EnergyCo's lack of genuine consultation and the detrimental impact this project will have on our business and our lives. Our number one issue is the plan to locate two 500kV powerlines so close to our home. This is not fair or reasonable! EnergyCo have acted with little sensitivity and no amount of compensation will cover our loss.	2/11/2024 2:18 PM
6	The transmission line on our property runs down our boundary which is the most suitable route for us. However this also makes us feel that we have our hands tied as if we are too disagreeable the line can be put on our Neighbours property, with no house and no-one lives on, and we don't get any compensation and it would only be 50mtrs further from our house. The line will be very close to our house and impact our view and who knows what health impacts we may have in the future. However as stated before we feel we need to negotiate some compensation.	2/10/2024 2:46 PM
7	We are astounded by the inability to get a straight answer to any questions put forward. The we will get back to you is the standard reply. This could be weeks, months or not at all. It holds up any negotiating and decision making. Energy Co will not commit to an answer and not unusual to get different answer to same question depending on who you are speaking to at the time. So obvious that the left hand does not know what the right hand is doing. This experience has been frustrating, exhausting and traumatising to say the least. We have no confidence in this authority to do the right thing by us or our community	2/10/2024 2:46 PM
8	energycos valuer lunney is a proper cunt. energycos staff are otherwise good to deal with, but pretty disorganised.	2/10/2024 1:21 PM

6 / 6

Strategic Benefit Payments Scheme

According to the EnergyCo website the Strategic Benefits Payments Scheme (SBP Scheme) was established by the NSW Government for new major transmission projects. "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." "The payments are a set rate of \$200,000 (in real 2022 dollars) per kilometre of transmission hosted, paid out in annual instalments over 20 years. These benefit sharing payments are in recognition of the critical supporting role these landowners will have in hosting the new energy infrastructure that will power the State into the future and to ensure they share directly in the benefits of the significant economic investment. These payments are separate, and in addition to, any compensation that is paid to landowners for transmission easements on their land in accordance with the *Land Acquisition (Just Terms Compensation) Act 1991*."

From CWO REZ CRG Meeting Minutes 27th April 2023:

The transmission towers have a specified design life of 50 years. Once they reach 50 years, the towers would have exhausted their design life and are due for replacement. The Network Operator may implement a regime of maintenance and upgrades to allow the practical design life to be extended, such as replacing specific elements once they reach the end of their service life.

Transmission easements have no expiry and will remain in place indefinitely or until such time as EnergyCo takes steps to remove it. In short, the useful life of a transmission tower does not impact the life of an easement.

Given that transmission towers have a design life of fifty years, why are private landowners who are “hosting” transmission infrastructure only being paid for 20 years? Landowners willingly signing up to host wind and solar installations on their property are paid much more handsomely and for the life of the project, and they have the choice to say no; there is no compulsory acquisition at this time for those types of projects. The negative impacts of having large scale energy infrastructure on your property do not, simply, stop after 20 years, and as is stated above, transmission towers have a life of 50 years and a transmission easement has no expiry.

Land Acquisition (Just Terms Compensation) Act 1991

During a meeting with Minister Sharpe and the Treasurer in February 2024 (detailed later in this submission) the Just Terms Act was discussed. The Treasurer explained that the Act was designed to deal predominately with the construction of roads, schools, hospitals and railways, particularly in metropolitan Sydney. He also made the point that the Act was not built to do easements for energy infrastructure on agricultural land. Following that Minister Sharpe said that the transition to renewable energy was asking Government departments to work with planning and compensation systems that are “not fit for purpose”.

Many landowners have raised issues around not being able to adequately claim compensation under the Just Terms Act for loss of income, the impact of the proposed transmission lines on their properties and businesses and the time and financial impact of negotiating with a public authority like EnergyCo. Whilst I cannot explain the process clearly as I am not an affected transmission landowner I believe the process for claiming compensation should be as straightforward as possible. Many landowners have expressed that because the Act wasn’t designed to cater for large scale energy infrastructure projects on agricultural land finding a way to claim for financial, production and personal losses is tricky.

Treasurer Mookhey stated that he believes transmission affected landowners do have a right to be compensated for the loss of easements on their property. He said that the Labor party had been pushing EnergyCo to be a “model negotiator”, and that he was worried that they weren’t living up to that characterisation. He reassured the affected landowners present that he would look into it. Unfortunately, there have been no changes as yet so, unless any future alterations to the Act are backdated, CWO REZ transmission affected landowners will not see any benefits.

Minister Sharpe said the following in the Budget Estimates Hearing held on 7th March 2024:

One of the conversations that we had with the farmers under the tree in Dunedoo was the way in which the just terms Act operates. The point that the Treasurer and I made at the time was that when the just terms Act was originally envisaged, it wasn't envisaged for something like a renewable energy zone. It was very much about building a road, doing compensation and fairly straightforward infrastructure projects. These are far more complex projects. The point is that there probably need to be changes to the Act, but the advice that I've got—and we did ask about this—is that there are sections of the Act where we believe there is flexibility that can occur in terms of negotiations. We've asked EnergyCo to look at those and to make sure that they're being fair and reasonable when they're working with landholders. I think that's really important.

The other point is that the just terms Act is under review. That comes under Minister Kamper, people would be aware. One of the things that I've been working with Minister Kamper on is making sure that the issues that are arising through the process for renewable energy zones are picked up in that review and any changes that need to be made in the future will be picked up to make sure that it really does reflect what is quite an emerging issue that's come in the way that we deal with compensation claims, because these are new bits of infrastructure that really hadn't been contemplated when the Act was originally envisaged.

I find it interesting that the review of the Just Terms Act was not mentioned during the discussion with Minister Sharpe and the Treasurer in February 2024 – would that not have been a great opportunity for the MP’s to suggest becoming involved in the consultation that would be undertaken so soon after?

Mr STEPHEN KAMPER: That's great, and I must note we both spent time on the Valuer General's committee. We have done some fantastic work together on that. I acknowledge the question from the Chair. Compulsory land acquisitions are necessary at times to allow State infrastructure and other public projects to proceed for the benefit of the wider community, such as schools, roads, water and electricity infrastructure projects. Land may be acquired by agreement or compulsorily. Compulsory land acquisitions are not undertaken unless it can be demonstrated that there is a significant benefit to the broader public. The Government's framework for property acquisition strives to strike the right balance between the rights of landowners and the public good derived from essential public infrastructure.

However, there is always room for improvement, as reported by the Legislative Council Portfolio Committee No. 6 – Transport inquiry in 2022 into acquisition of land in relation to major transport projects. In late 2023 the New South Wales Government, led by the Department of Planning, Housing and Infrastructure, commenced the land acquisition review. The land acquisition review will include a legislative review of the Land Acquisition (Just Terms Compensation) Act 1991, involving both the New South Wales Government and public consultation and a review of the whole-of-government approach to acquisitions.

During the review the department will consider stakeholder comments, relevant legislation in other jurisdictions and feedback from the public consultation on this discussion paper. The department will also consider feedback and information from previous reviews into the Act, including the inquiry. The department commenced internal government consultation in September to provide acquiring authorities and key agencies an opportunity to provide detailed, evidence-based information about potential amendments to the Act and the whole-of-government acquisition process. To address current risks and inconsistencies, a discussion paper has now been drafted to assist to guide the public consultation. The community will be invited to have its say early this year in order to put forward recommendations to the New South Wales Government late this year.

The Land Acquisition Review, according to the above stated by The Hon. Stephen Kamper, Minister for Lands and Property, led by DPHI, commenced in September 2023 with internal Government consultation. The following is stated on the NSW Government website “The Department consulted with key government agencies and acquiring authorities, including local councils, in late-2023. The Department received 31 submissions with over 400 individual comments. We consolidated these into key themes and have drafted a discussion paper detailing possible areas for improvement. The discussion paper was published on the NSW Governments Have Your Say website for community feedback between 22 March and 3 May 2024. Members of the community and interested stakeholders were encouraged to respond to the discussion paper and give suggestions on possible reforms to the Just Terms Act and whole of government acquisition processes. During this time information sessions were held in Sydney, Hunter, North Coast, South Coast, Central West and Riverina regions, as well as online sessions.”

Below is my submission to the Land Acquisition Review:

Options for Reform - Key Theme Areas	Do you have any other suggestions to encourage acquisition by agreement?
<p>Please choose which topic area you would like to respond to from the list below. You can also choose to make a submission. (select all that apply)</p> <ul style="list-style-type: none"> • Theme 1 – Genuine Negotiation • Theme 2 - Mediation • Theme 3 - Clarify certain compensation provisions • Theme 6 – Legislative amendments to clarify certain requirements • Theme 7 - Coordination of multi-agency acquisitions • Theme 8 – Improved consistency in government acquisition processes 	<p>Public authority staff LISTENING to landowners and community, and COLLABORATING early in the planning process. Not using "consultation" opportunities to merely INFORM affected landowners.</p>
<p>Theme 1 - Genuine Negotiation</p> <p>What do you think of the suggested options within Theme 1?</p> <p>Agree with the suggestions for Theme 1.</p> <p>-genuine negotiation is a major issue with the current land acquisition process in NSW. The experiences I have had with public authorities and compulsory acquisition have been nothing short of disgusting (using compulsory acquisition as a threat from the initial point of contact should not be an option!). The treatment of affected landowners should be a priority (no lying, manipulation or deception). Land acquisition managers should be held accountable for their actions.</p> <p>-there should also be a minimum level of information made available to landowners PRIOR TO an opening letter being sent for projects requiring an easement ie. transmission lines -construction plans/timelines should be made available. It is inconceivable for landowners to be expected to agree to an easement on their land with no knowledge of what construction or operation will look like on their property (stock movements, crop sowing and harvesting etc).</p>	<p>Theme 2 - Mediation</p> <p>Would a mediation option place landowners in a better negotiating position?</p> <p>Yes, providing public authority staff and government are willing to be transparent and honest.</p> <p>If mediation is introduced, should it be for all land types?</p> <p>Yes.</p>
	<p>Theme 3 - Clarify Certain Compensation Provisions</p> <p>What do you think of the suggested options to clarify certain compensation provisions?</p> <p>Mostly agree.</p> <p>Do you have any other suggestions to clarify compensation provisions?</p> <p>There must be provision for landowners affected by transmission project easements due to:</p> <ul style="list-style-type: none"> -loss of income throughout construction and operation (not being able to use paddocks, changing land use -not being able to crop certain paddocks) -disturbance due to construction and operation (changes in paddock access and uses, roads and tracks being constructed, drainage being changed by construction) -landowner payments for time spent negotiating (most landowners spend countless hours researching, travelling to meetings etc, all unpaid, which is time away from their businesses -public authority staff are all paid whilst they are working on these projects)

Theme 6 - Legislative amendments to clarify certain requirements	Review & Submit
What do you think about these suggested options? Mandatory reporting should be introduced.	Please review your answers below and submit your responses on confirmation.
Do you have any other suggestions for legislative changes to clarify requirements? No answer	What best describes you? Landowner previously affected by an acquisition
Theme 7 - Co-ordination of multi-agency acquisitions	What type of interest did you have over the land or interest acquired? (select all that apply) • Business owner
Do you have suggestions to improve the coordination of multiagency acquisitions? Agree with the suggested improvements.	What type of acquisition were you affected by? (select all that apply) • Acquisition of land
Theme 8 - Improved consistency in government acquisition processes	What acquiring authority(s) acquired interest in your land? (select all that apply) • Transport for NSW
What do you think of the suggested options within Theme 8? Agree.	How would you rate your overall experience in the acquisition process? Poor
Do you have any suggestions to improve guidance and consistency for whole-of-government acquisition processes? More collaboration between acquiring authorities and affected landowners in early planning.	Do you think the Land Acquisition (Just Terms Compensation) Act 1991 has room for improvement? Yes
Can the project team contact you if more information is required? Yes	Are you of Aboriginal or Torres Strait Islander origin? Neither Aboriginal or Torres Strait Islander
Please tell us your first and last name Emma Bowman	Postcode 2844

The review process suggests that feedback and any suggested changes and process improvements was to be compiled in mid-2024, the Department would have developed draft recommendations in mid to late-2024 and that recommendations to government are anticipated to be submitted for consideration in 2025. Will this process be completed in time to actually help any of the REZ transmission project affected landowners if advantageous changes are implemented?

Port to REZ Road & Utilities Upgrades

According to the EnergyCo website, “Delivery of projects in REZs will require the transportation of large and heavy renewable energy components from ports such as the Port of Newcastle. These can include wind turbine components and transformers for generation and transmission infrastructure. EnergyCo and Transport for NSW are working to upgrade road intersections and pinch-points along the state-road network to enable the movement of oversized and over-mass (OSOM) loads for renewable energy equipment. Initial upgrades will take place on-road sections between the Port of Newcastle and the Central-West Orana and New England REZs. EnergyCo is the proponent leading the Port to REZ road upgrades, while Transport for NSW is the road authority and lead agency for the operation of the road network.”

From the EnergyCo website:

Road upgrade benefits

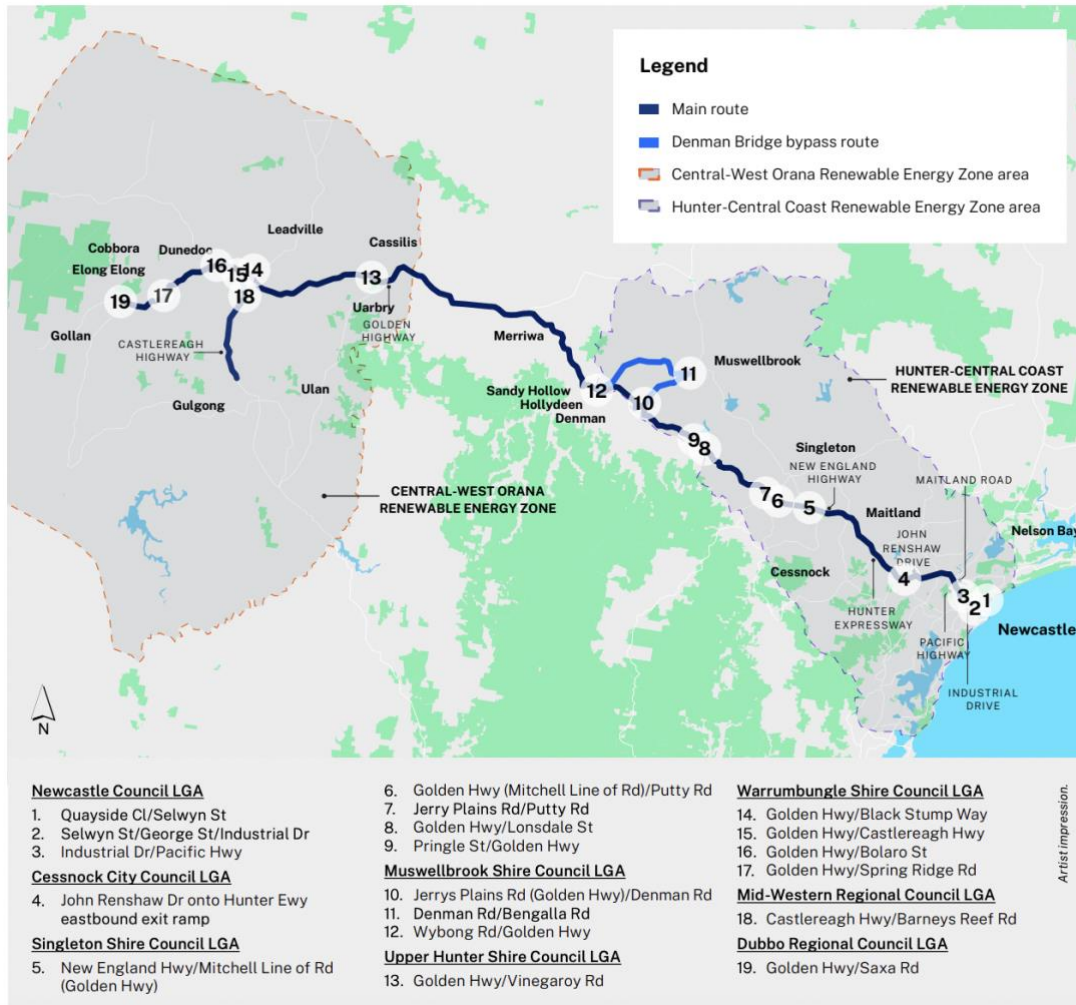
The road improvements needed to cater for OSOM vehicles are part of the evolution of the state road network as Transport for NSW responds to changing needs of industry, businesses, the community and travelling public.

The Port to REZ road upgrades will:

- enable delivery of large components essential to construct and operate major critical REZ transmission and generation projects
- minimise disruption and improve safety for other road users during the movement of OSOM loads
- include improvements to intersections and pinch-points and new passing bays
- be designed to enable safe passage of OSOM components and reduce impact on road users.

Nineteen locations have been identified as needing minor upgrades to facilitate the transportation of wind turbines and other crucial components for wind, solar and transmission projects. The work varies from road widening and relocating road signs and utility poles to new turning lanes to efficiently accommodate OSOM loads.

Map of the Port to REZ Route – Port of Newcastle to Elong Elong



According to the Business Case for Golden Highway Road Corridor Improvements, funded by the NSW Government’s Regional Business Case and Strategy Development Fund and developed by The Stable Group on behalf of Regional Development Australia (RDA) Orana, “The Golden Highway stretches from Dubbo to the intersection with the New England Highway and the Hunter Expressway and is an essential corridor for the movement of freight and provision of services between the Port of Newcastle and Western NSW through Dubbo. It is also part of a wider transport network which connects communities with communities, communities with economic centres and to connect economic centres.”

“The Golden Highway Corridor (GHC) in conjunction with the Hunter Expressway (M15) facilitates the movement of export commodity flows to Newcastle, and the inbound flow of goods and services across the region. It carries a relatively high proportion (30%) of heavy vehicles. It features very few overtaking lanes, narrow (some very narrow) bridges and inadequate intersections. It should serve as a relief route to and from Sydney when the Great Western Highway/Mitchell Highway is unavailable.”

Priority 1 Infrastructure Solutions

On completion of the Priority 1 Infrastructure Solutions, vehicles of PBS Class 2B would be able to access the Golden Highway from Dubbo through to Newcastle. Additionally, they address the most pressing safety concerns highlighted in the Golden Highway Transport Study (The Stable Group, 2023) and Golden Highway Corridor Study (Transport for NSW, 2016), particularly due to the increase in over-size over-mass movements along the highway.

The do-minimum option includes those projects identified in the Golden Highway Study Report (Annex C) which should be completed in 5-year time frame. These include:

- 4 level crossing upgrades – 3 require protecting and widening, 1 requires widening only.
- 12 overtaking lanes – 6 eastbound, 6 westbound.
- 2 widening of small bridges.
- 1 widening of large bridge.
- 1 duplication of large bridge.
- 1 intersection upgrade.

I am perplexed that EnergyCo and Transport for NSW (TfNSW) consider upgrading intersections and existing infrastructure in nineteen locations will render the route from the Port of Newcastle to Elong Elong safe and convenient for current traffic to coexist with the proposed movement of countless OSOM vehicles, given my knowledge of the route and following the release of the RDA Orana report.

RDA Orana's Priority 1 Infrastructure Solutions "do-minimum option" suggests there should be 12 overtaking lanes, six eastbound and six westbound, constructed in a five year time frame. The report states that "Sectional data from a detailed on-road study reveals that the percentage of the route that provides sight distances greater than 900m is 10.8%." Reference A (Policy and Guidelines for Overtaking Lanes, WA Main Roads, updated Dec 2011) says that "The guidelines emphasise the need for overtaking lanes on low traffic volume rural roads where significant delays can result from drivers not being able to overtake large slow-moving vehicles. These frustrations increase the potential crash rate due to road users attempting to overtake vehicles in unsafe situations. The Austroads guidelines are adequate in high traffic volume situations but fail to recognise the need for overtaking lanes on low traffic volume rural roads on which significant delays can result from vehicles not being able to overtake large freight and slow-moving vehicles. These delays increase the potential crash rate by encouraging road users to attempt to overtake vehicles in unsafe situations."

Please watch the following video created by RDA Orana

- https://www.youtube.com/watch?v=W-_LMLhdyg

From the Port to REZ Road Upgrade Fact Sheet – November 2024:

Q. Are there any new or improved pullover bays included in the Port to REZ upgrades?

EnergyCo, in consultation with Transport for NSW are assessing the existing pull-over opportunities along the Port to REZ route. EnergyCo are looking to provide additional pull-over bays along the route to allow other vehicles to safely overtake, and for OSOM vehicle operators to safely transport renewable energy components along the corridor. More information about new or improved pullover bays will be shared in early 2025.

During a discussion with an EnergyCo Port to REZ staff member and a TfNSW employee at the Dunedoo Markets in December 2024 with a number of other local community members, it was made clear there were no overtaking lanes scheduled for inclusion in the Port to REZ upgrades at this stage, only layover bays (which are not included in the nineteen locations for upgrade on the map above). We attempted to impress upon the EnergyCo and TfNSW team members that layover bays would not be an effective solution to the congestion impacts that will be exacerbated by the enormous increase in OSOM and heavy vehicle movements along the Golden Highway. We described the current lack of opportunities to overtake along the route and the risks drivers are already taking to pass heavy and slow vehicles – a truck driver told me there is a steep hill near Merriwa, with limited sight distance, where he experiences a dangerous driving situation every time he drives the route.

I attempted to question the Port to REZ representative further about the locations of the proposed layover bays. As in the above screenshot, I was told investigations into the placement of such sites was ongoing so there was no further information available. I asked if any land would need to be acquired for the installation of the layover bays, the reply was a very simple no. As I said on the day, how is it possible for EnergyCo to categorically state there would not need to be any extra land acquired, either voluntarily or compulsorily, if sites for the layover bays have not yet been identified?

From the Port to REZ Road Upgrade Fact Sheet – November 2024:

Engaging with community and stakeholders

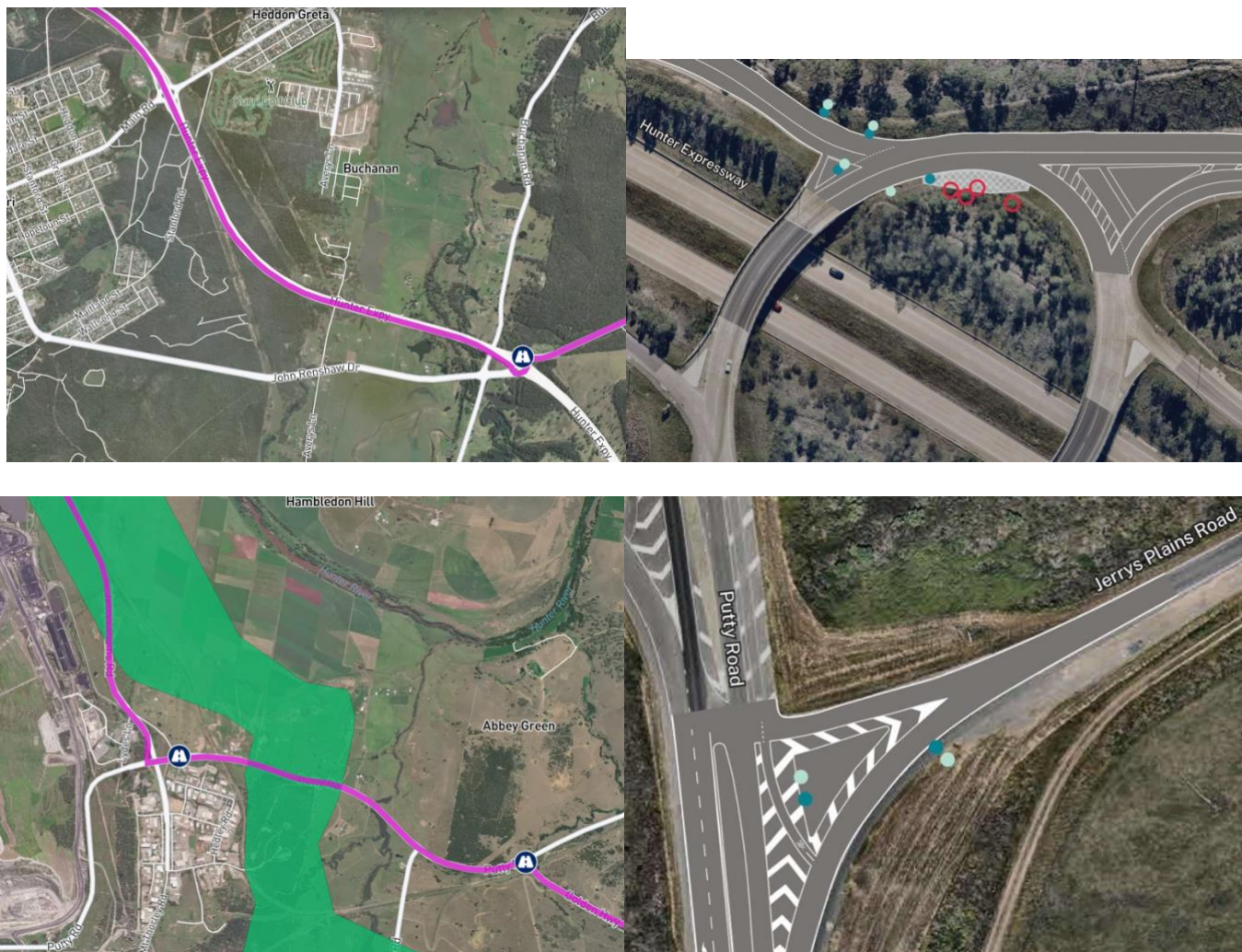
EnergyCo has been actively consulting with stakeholders including local Councils in the Hunter, Central-West Orana, and New England regions.

Councils within the Hunter region have been directly briefed on the proposed intersection designs and interactions.

EnergyCo and Transport for NSW have engaged community and road users regarding impacts during design investigations – this has included traffic alerts and notifications to residents and stakeholders near areas of work.

More information about upcoming consultations will be provided in the coming months. EnergyCo will provide communities with sufficient notice ahead of any upcoming engagement activities.

There has been a distinct lack of consultation of the Merriwa and Dunedoo communities regarding OSOM and heavy vehicle movements that will be required to navigate the main streets of their towns. ‘Advertising material’ has told us that wind turbine components will be transported through rural towns overnight yet during the conversation at the markets it came to light that the OSOM loads will be leaving the Port of Newcastle in the middle of the night so as to drive down the eastbound lane of the Hunter Expressway, and I have since discovered the Jerry’s Plains Road, due to road restrictions. Upon investigation I found that EnergyCo’s Interactive map depicts (see below screenshots) that the route will be along the correct side of the road, in both instances, but when you look at the proposed works it is obvious the OSOM loads will travel on the incorrect side of the road. Another case of misrepresentation from the EnergyCo team?



From CWO REZ CRG Meeting Minutes 28th September 2023:

- SE: When will the Port to REZ consultation take place? BC: Towards the end of 2024. This will be a Review of Environmental Factors rather than an Environmental Impact Statement.

property for the existing powerlines but I am aware that the Electricity Supply Act 1995 grants electricity distributors power to access, maintain and operate electrical infrastructure.

I have not heard from EnergyCo regarding the lifting of the aforementioned lines since mid October although I have been informed by other landowners who received the same letter from EnergyCo's Port to REZ team that EnergyCo staff advised them to sign the Consent Form or risk having no say in how the works were carried out on their property. Yet another example of the bullying tactics employed by EnergyCo to gain access to private properties!

I believe, given EnergyCo's lack of understanding of what is required to make the Golden Highway safe and reliable, and its poor reputation among landowners and communities, the Port to REZ road upgrades will be a lot more significant and time consuming than currently thought. I foresee major stumbling blocks and a disastrous death and injury toll if this element of the REZ rollout is rushed through without proper planning and execution.

Revolving Door of Employees/Consultants/Contractors

Throughout the rollout of the Central West Orana REZ there has been an almost continuous adjustment of EnergyCo employees, consultants and contractors. Community members who attended multiple meetings and information/drop in sessions found themselves speaking to different EnergyCo team members on most occasions. A lack of continuity of community consultation or project knowledge has led to individuals, and groups, saying the same thing over and over again without any adequate response in a lot of cases. It was blatantly obvious that the EnergyCo staffing levels were not where they needed to be to carry out such a mammoth community engagement exercise and as a result the CWO REZ impacted communities have suffered through a poor execution of that phase of the project which has come home to roost in the design and planning decisions that were made essentially without community input.

From CWO REZ CRG Meeting Minutes 17th October 2023:

- CA advised of changes to the community engagement team. Cara Inia has left project, new members include Megan Jones (based in Dubbo), Renee Ridley and Anissa Baiquini. CA and Matt Milller moving into roles supporting REZ coordination (i.e. SteerCo, community benefit initiatives).
- BS would like to acknowledge the relationship that has been made between current Comms team and the CRG. LA asked for this to be noted in minutes.
- SE stated changing the team mid-EIS engagement is poor timing.

As previously stated, the majority of the EnergyCo community engagement team was replaced in the midst of the biggest project milestone and opportunity for feedback for community. Completely unacceptable!

From CWO REZ CRG Draft Meeting Minutes 10th December 2023 (screenshot taken 20.1.25):

EnergyCo representatives	Thomas Watt, CWO Director Planning & Policy (TW)
	Yvette Lloyd, CWO Director Regional Coordination (YL) <i>online</i>
	Anissa Baiquini, CWO (AB) <i>online</i>
	Rebecca Williams, CWO (RW)
	Shannon Schofield, CWO (SS)
	Jane Sayabath, CWO (JS) <i>online</i>
	Alicia Rados, CWO (AR) <i>online</i>
	Mariana Cidade, CWO (MC) <i>online</i>

I wonder how community members are meant to get their heads around the number of EnergyCo staff, their roles and the appropriate person to contact considering the minute taker, who I can only assume is an EnergyCo team member, is not able to state the title of each employee in the draft minutes?

An example of the changes occurring:

Stephen Page
Acquisition Manager, Central-West Orana REZ
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

www.energy.nsw.gov.au



EnergyCo



Stephen Page
Property Advisor



PARTNERING ON DESIGN AND CONSTRUCTION

The seemingly incestuous cesspit of bureaucrats and consultants jumping from one Government job to another, in some cases even after an extremely poor performance, makes a mockery of the administration of our state, and country, and ultimately leads to the poor rollout of models like the REZ's.

Undisclosed Consultants

Throughout EnergyCo's rollout of the CWO REZ the procurement of consultants and contractors has been very murky. It has been very difficult for community members to understand who they are dealing with – especially when you consider the addition of renewable energy developers concurrently.

During the Inquiry into NSW Government's Use and Management of Consulting Services EnergyCo was required to provide a list of every professional services engagement undertaken since 2019. That process brought to light several consultants that have not been listed in EnergyCo's Annual Reports.

According to the information EnergyCo provided to the Inquiry, Turnpike Advisory Pty Ltd was engaged to undertake several packages of work over a period of just under 3 years:-

- CWO REZ Development Support from 16/11/2021 to 30/6/2023 for a total value of \$793,298.15.
- Central-West Orana Renewable Energy Zone Project Leadership Services from 1/9/2023 to 30/6/2024 for a total value of \$2,257,128.00.
- CWO REZ Project Development Management from 21/3/2022 to 31/12/2023 for a total value of \$8,349,660.00.

From CWO REZ CRG Meeting Minutes 27th April 2023:

- RH: What is EnergyCo's relationship with Turnpike? CA advised Turnpike is one of the companies contracted by EnergyCo for CWO to provide resources to support the delivery of the project.
- RH commented it is very disingenuous and there is a lack of transparency within this group. RH: Can you identify who is who? CA advised EnergyCo's staff includes a mix of direct employees and contract staff. This is standard practice for major government infrastructure projects. Several companies have contracts to provide employees to EnergyCo. **ACTION:** RH requested that EnergyCo provides information on the role of the place managers.

The following was sourced from the CWO REZ CRG Meeting Minutes 31st October 2023:

- SE asked if Chris Swann still the project director.
- CA advised yes.

Screenshot taken of the Turnpike website our team page:



Christopher Swann,
Managing Director
PROJECT DEVELOPMENT &
DELIVERY ADVISORY

Turnpike Advisory Pty Ltd was not listed in either the 2022-2023 or 2023-2024 EnergyCo Annual Reports under Consultant Expenditure. Given that EnergyCo has spent over \$11 million on the services of

Turnpike Advisory consultants, not all within the aforementioned two year reporting period, I am at a loss as to how their engagement is not declared.

Also arising from the procurement document EnergyCo provided to the Inquiry is information regarding Alexandra Venice Consulting's (AVC) engagement for several packages of work over a period of just more than 12 months:-

- Hunter Transmission Project – Technical Management Services from 20/12/2022 to 10/11/2023 for a total value of \$688,890.00.
- Hunter Transmission Project – Property Due Diligence from 24/1/2023 to 31/10/2023 for a total value of \$273,000.00.
- CWO REZ Technical and Planning Services from 21/3/2022 to 31/12/2023 for a total value of \$8,379,053.93.
- CWO REZ WH&S Advisor from 23/5/2022 to 3/3/2023 for a total value of \$447,880.00.

Like Turnpike, AVC's engagement is not disclosed in the two most recent EnergyCo Annual Reports. Has the Audit Office of NSW done their due diligence? What are the penalties for such errors and/or omissions?

Annual Reports

I urge the Committee to take some time to look into EnergyCo's Consultant Expenditure in both the 2022-2023 and 2023-2024 Annual Reports. Whilst I don't have the time to go through the figures with a fine tooth comb a quick calculation of the consultant engagements of \$50,000 and over 2022-23 (table 13 – found on page 53 & 54) reveals that the total consultant expenditure disclosed on page 54 is more than double the costs declared in the table. The total stated on page 54 is \$47,595,391, I believe it would be closer to \$20 million – how many consultants are not declared in that table. There is also a credit related to 2022-23 works for a consultant in the 2023-24 Annual Report but the consultant is not listed in the 2022-23 table.

Is it acceptable that a statutory authority is not providing information either transparently or accurately? I wonder what else is either intentionally omitted or misrepresented within EnergyCo's Annual Reports?

Rates of Pay

According to data released by the Australian Bureau of Statistics (ABS) in December 2024 (reference period August 2024), the average employee in Australia was earning \$1,396 per week and the average hourly rate was \$40 per hour. Inhabitants of the Australian Capital Territory have the highest average weekly wage at \$1,688 per week and Tasmania the lowest at \$1,208 per week. New South Wales is very close to the national average at \$1,387 per week.

The highest median weekly earnings were taken home by Managers (\$2,100 per week) and the lowest were Sales Workers (\$714) and Labourers (\$900). Managers also had the highest hourly rate of pay (\$56.20), while Sales Workers and Labourers had the lowest (\$30). The sub-major occupation groups with the highest average weekly earnings in August 2024 included Chief Executives, General Managers and Legislators at \$2,669.

ABS found that the industries with the highest median weekly earnings were:

- Mining (\$2,593 per week, up from \$2,400 in August 2023).
- Electricity, gas, water and waste services (\$1,895, down from \$1,900).
- Professional, scientific and technical services (\$1,841, up from \$1,730).

The industries with the lowest median weekly earnings were:

- Accommodation and food services (\$650 per week, up from \$640 in August 2023).

- Retail trade (\$893, up from \$876).
- Arts and recreation services (\$1,000, up from \$908).

The agriculture, forestry and fishing workforce was calculated to have an average weekly salary of \$1,200.

According to the NSW Parliament website, from 1st July 2024 the base salary of a member of the Legislative Council or Legislative Assembly is \$172,576. The total remuneration, excluding the electoral allowance (base electoral allowance is \$77,965 to \$203,140) awarded to the Premier of New South Wales is \$416,440, Deputy Premier is \$350,329 and Senior Ministers is \$333,072.

According to the Remuneration Tribunal, effective 1st July 2024, the base salary payable to a Senator or Member of the House of Representatives is \$233,660. The Department of Finance "Salary and Remuneration by Role" document states that the Prime Minister receives 160% additional salary as a percentage of the base salary rounded up to the nearest \$10, being \$373,860 plus the base salary totalling \$607,520, Deputy Prime Minister 105% equating to a total of \$479,010 and the Treasurer 87.5% totalling \$438,120.

The below comes from the Annual Determination - Report and determination under section 240 of the Statutory and Other Offices Remuneration Act 1975 – 15 July 2024:

Different remuneration packages that apply to the senior executives named	
Band 4 – Secretary level	
Ms Karen Webb, Commissioner of Police:	\$679,050 per annum
Mr Simon Draper PSM, Secretary, Premier's Department:	\$626,300 per annum
Mr Michael Coutts-Trotter, Secretary, Treasury:	\$626,300 per annum
Mr Murat Dizdar, Secretary, Department of Education:	\$626,300 per annum
Ms Elizabeth Mildwater, Secretary, Department of Creative Industries, Tourism, Hospitality and Sport:	\$626,300 per annum
Ms Susan Pearce, Secretary, Ministry of Health:	\$626,300 per annum
Mr Michael Tidball, Secretary, Department of Communities and Justice:	\$626,300 per annum
Band 3 – Deputy Secretary level	
Mr Tom Gellibrand, Chief Executive Officer and Co-ordinator General, Infrastructure NSW,	\$588,250 per annum
Band 2 – Executive Director level	
Mr Douglas Parris, Executive Project Director, Energy Corporation of NSW (EnergyCo):	\$464,058 per annum
Mr Andrew Kingsmill, Executive Director, Technical Advisory Services, Energy Corporation of NSW (EnergyCo):	\$397,300 per annum

Is it acceptable that bureaucrats are being paid more than our most powerful politicians? Is this why the salaries of nurses, teachers, police and ambulance officers etc. cannot be granted pay rises?

The following has been sourced from the EnergyCo Annual Report 2023-2024:

Table 9: Reporting year senior executive headcount and average remuneration (as of 30 June 2024)

Senior Executive Band	GSE Act Level	Headcount			Average remuneration
		Female	Male	Total	
Executive Band 3	Deputy Secretary	0	2	2	\$462,969
Executive Band 2	Executive Director	3	3	6	\$361,642
Executive Band 1	Director	6	14	20	\$244,365
Total		9	19	28	

For 2023–24, the monetary value of employment benefits paid to senior executives represented 36.9 per cent of EnergyCo's employee salary-related expenses.

During 2023–24 we continued to develop our longer-term organisational structure, which included obtaining the Secretary's approval of senior executive roles, followed by finalising the non-executive roles in the organisational structure. As a result, the percentage of senior executive headcount relative to all employees' is temporarily high (25.5% as of 30 June 2024), as is the percentage of senior executive expenses relative to total employee expenses. These ratios are expected to reduce across future years as a greater number of non-executive roles are established and progressively filled.

Table 10: Previous year senior executive headcount and average remuneration (as of 30 June 2023)

Senior Executive Band	GSE Act Level	Headcount			Average remuneration
		Female	Male	Total	
Executive Band 3	Deputy Secretary	0	2	2	\$450,323
Executive Band 2	Executive Director	2	2	4	\$352,329
Executive Band 1	Director	2	10	12	\$242,943
Total		4	14	18	

Is it acceptable that 28 employees of EnergyCo are paid almost \$8 million in wages per annum? These are people that do not reply to emails, do not answer the phone and are not adequately consulting with

and lying to impacted community members and landowners. Meanwhile concerned community members and landowners are conducting research and attempting to mitigate impacts to their homes and businesses voluntarily – is this fair?

The twenty directors employed at the time of the writing the 2023-24 Annual Report had an average remuneration of \$4699 per week (calculated over 52 weeks), the Deputy Secretaries averaged \$8903 per week. When compared to the national average weekly wage, EnergyCo executive band three employees are receiving over six times the average and band one employees over three times. How can this be justified?

The following was sourced from EnergyCo's Question on Notice and Supplementary Question document provided to the Inquiry into NSW Government's Use and Management of Consulting Services:

The figures provided are for FY22/23 and are based on information available to us at the time of writing. Full details will be published in EnergyCo's annual report, to be published in November 2023.

- i. The average annual payment to contractors engaged by EnergyCo is \$202,967.52.
- ii. The average daily rate paid to contractors is \$2,267.36 per day (ex GST).
- iii. The mean annual payment is \$116,914.98.

According to the same document the highest paid contractor received \$2,580 per day and an annual salary of \$557,280 – I calculate that as having been 216 days of work. Fifteen contractors were awarded an annual salary over \$400,000. The lowest daily rate of pay was \$1,114, the highest \$3,500.

An average daily rate of \$2,267.36 equals \$11,336.80 per week (5 days) – take a look back at the median weekly wage taken home by an Australian and you'll notice the outrageousness of such a salary. Then look at the stark contrast of these figures with the lowest paid Australian residents at a median of just \$650 per week.

Is the reason EnergyCo is paying so much for the workforce to deliver the REZ's due to the need to poach workers/contractors from other industries? What will happen to the rest of NSW and Australia's businesses who rely on the same labour force? While it is good news for individual wealth, will this impact inflation and only lead to a worsening economic situation for the state, and country?

Accountability

There have been countless instances of EnergyCo staff, whether it be employees, contractors and/or consultants, making mistakes or errors in judgement, that have not, to my knowledge, been held to account for what I find to be unacceptable reasons (ie. staff are no longer under the employ of EnergyCo) or no reason at all.

1. Employees telling transmission affected landowners that other groups of or individual landowners have "signed up" or are "happy" with the project when that is not the case.
2. Not requesting permission from landowners to gain entry to their property and/or lying about the reason for entry.
3. Leaving gates open on a property, letting rams in with ewes out of season (costing the landowner a loss of production due to out of season lambs, and a loss of time to rectify EnergyCo's error).
4. A staff member telling a "new" neighbour of a workers camp that other neighbours were on board with the proposal after working through some issues when, unbeknownst to the staff member, the "new" neighbour was an existing neighbour who had purchased a new property, and now neighboured the majority of the proposed workers camp.
5. Error in the CWO REZ CRG meeting minutes amended without notice.
6. Minutes from the final meeting of the CWO REZ RRG 'can not be located'.

7. Informing community members that mental health support, through the Property Acquisition Hotline, was available for all CWO REZ residents when that was not the case at the time.
8. Expecting paid feedback sessions with a 'qualifying survey' would be accepted by the community as "consultation and engagement".
9. Leaving nine newsletters in one mailbox in January 2025 regarding "pre-construction minor works for Merotherie site" (the Dunedoo district has not had road side mail delivery since October 2022 – barring a two week period). Does EnergyCo expect the landowner to distribute these flyers to their neighbours – is that "community consultation"?
10. Unprofessional correspondence received by legal representative of affected landowner –

From: Andrew Aylward
 Sent: Monday, 6 November 2023 4:40 PM
 To: Stephen Page <stephen.page@energyco.nsw.gov.au>
 Cc: Bridget Kelleher
 Subject: FW: Proposed Location of Transmission Lines at 313 Gingers Land, Tallawang NSW 2852

Hi Pagey. Send this PDF letter. Not the previous Word one.

Andrew Aylward
 Senior Land Acquisition Manager, Central-West Orana REZ
 Energy Corporation of NSW (EnergyCo)
 Office of Energy and Climate Change

www.energyco.nsw.gov.au



EnergyCo

From: Andrew Aylward
 Sent: Monday, 6 November 2023 4:38 PM
 To: Stephen Page <stephen.page@energyco.nsw.gov.au>
 Subject: Proposed Location of Transmission Lines at 313 Gingers Land, Tallawang NSW 2852

Hi Stephen,

Please create a new email and send the attached Letter response via email to Helen Pegg. Today would be good.

You can copy the subject into your new email.

Thank You

Andrew Aylward
 Senior Land Acquisition Manager, Central-West Orana REZ
 Energy Corporation of NSW (EnergyCo)
 Office of Energy and Climate Change

From: Stephen Page
 Sent: Tuesday, 7 November 2023 5:47 PM
 To: [REDACTED]
 Cc: Bridget Kelleher ; Andrew Aylward ; Michael Swann

Subject: Proposed Location of Transmission Lines at :

Dear [REDACTED]

I have enclosed a response from EnergyCo regarding recent communication about the alignment of [REDACTED]

Should you have any questions, please do not hesitate to reach out to me.

Regards

Stephen Page
 Acquisition Manager, Central-West Orana REZ
 Energy Corporation of NSW (EnergyCo)
 Office of Energy and Climate Change

www.energyco.nsw.gov.au



EnergyCo

Headroom Assessment

From EnergyCo's CWO REZ Headroom Assessment – Final Decision document:

1.3. Consultation on the Draft Headroom Assessment

EnergyCo published a notice of its Draft Headroom Assessment on 1 August 2024. The document was open for consultation from the date of publication until 5 September 2024.

Overall, 14 submissions were received and EnergyCo has considered each of these submissions when making a final decision on the headroom available in the Central-West Orana REZ.

In response to submissions received during the consultation period, EnergyCo has published a fact sheet to provide accessible information on the headroom process and the impacts it will have in the REZ. The intention of the document is to provide a plain English explanation of this process.

I would suggest that the reason there were only fourteen submissions received is partly due to the fact that EnergyCo did not publicly advertise the Draft Headroom Assessment beyond the notice on the EnergyCo website which I stumbled upon two weeks after it was released (see email correspondence [EnCo 09](#). – no response from EnergyCo regarding this matter). The other reason for the lack of comment from the public is the absence of explanation for the general public of what a headroom assessment is. I also raised this in my email conversation which was with Minister Sharpe's office given EnergyCo's lack of reply.

EnergyCo's Notification of Draft Headroom Assessment in the Central West Orana Renewable Energy Zone, published August 2024 states the following:

1.1. Consultation on the Notification of Draft Headroom Assessment

This Notification of Draft Headroom Assessment is open for public consultation for a minimum period of 28 days.¹² Feedback must be in the form of written feedback and can be submitted to:

Submissions close on 5 September 2024.

The original closing date for submissions was 29th August 2024. Is it acceptable to change original documents without a note stating an amendment has been made? This is not the first time EnergyCo has used this practice.

Email received 28th August 2024 (the day prior to submissions originally closing):

Dear Ms Bowman

The Member for Barwon has passed on your correspondence to the Minister for Energy regarding the Draft Notification of Headroom Assessment for the Central-West Orana Renewable Energy Zone Access Scheme.

EnergyCo has considered your request and extended the consultation period by one week, submissions now close on **5 September 2024**.

We have made this decision to ensure there is sufficient time for stakeholders to provide feedback.

A formal response on behalf of the Minister for Energy is being prepared that further addresses the concerns raised in your correspondence. This will be sent in due course, however we wanted to reach out directly so you were informed of the extension to the consultation period as soon as practicable.

Kind regards,

Central-West Orana REZ Access Program Management Team
Energy Corporation of NSW (EnergyCo)

According to EnergyCo's Central West Orana Renewable Energy Zone: Headroom Assessment – Final Decision, published in January 2025 "At the date this decision is made, no projects have been allocated access rights for the access rights network, and the previous aggregate maximum capacity in the single 24-hour capacity period under the Access Scheme Declaration is 0 MW." "EnergyCo has identified that the aggregate maximum capacity cap can be increased by 1.86 GW without forecast curtailment exceeding TTCL (see section 2.3)."

Summary of Final Headroom Assessment decision

- Headroom determined: 1.86 GW
- Previous aggregate maximum capacity cap: 5.84 GW
- New aggregate maximum capacity cap: 7.7 GW

Email received 17th January 2025:

Good afternoon

Thank you for the feedback you provided in your submission during the exhibition of the Draft Headroom Assessment between August and September 2024, which has helped to inform the final decision.

After extensive review, Energy Corporation of NSW (EnergyCo), in its capacity as Infrastructure Planner, has published its final decision to increase generation capacity for the Central-West Orana Renewable Energy Zone (REZ) to 7.7 gigawatts (GW).

The increase in generation capacity follows the decision in 2023 to increase the network capacity of the Central-West Orana REZ from 3 GW to 6 GW, noting it will initially operate at 4.5 GW.

The 4.5 GW (network capacity) of the Central-West Orana REZ will allow 7.7 GW (generation capacity) of projects to connect. This is because wind, solar and battery projects operate at different times of the day and do not all generate energy at the same time.

This increased capacity will allow some of the projects identified in the Central-West Orana REZ Environmental Impact Statement to deliver additional energy with minimal changes to the overall footprint of the REZ. The capacity increase does not increase the scope of the Central-West Orana REZ transmission corridor. Extensions are not currently proposed and would be subject to separate planning and regulatory approval processes.

If the full 7.7 GW of generator capacity is awarded, it would increase the Community and Employment Benefit funding from access fees.

We have taken onboard your feedback to simplify technical terms and concepts relating to the REZ so the content is suitable for a general audience. This includes developing a fact sheet and an interactive glossary, which you can view via this [link](#), along with the final decision.

regards

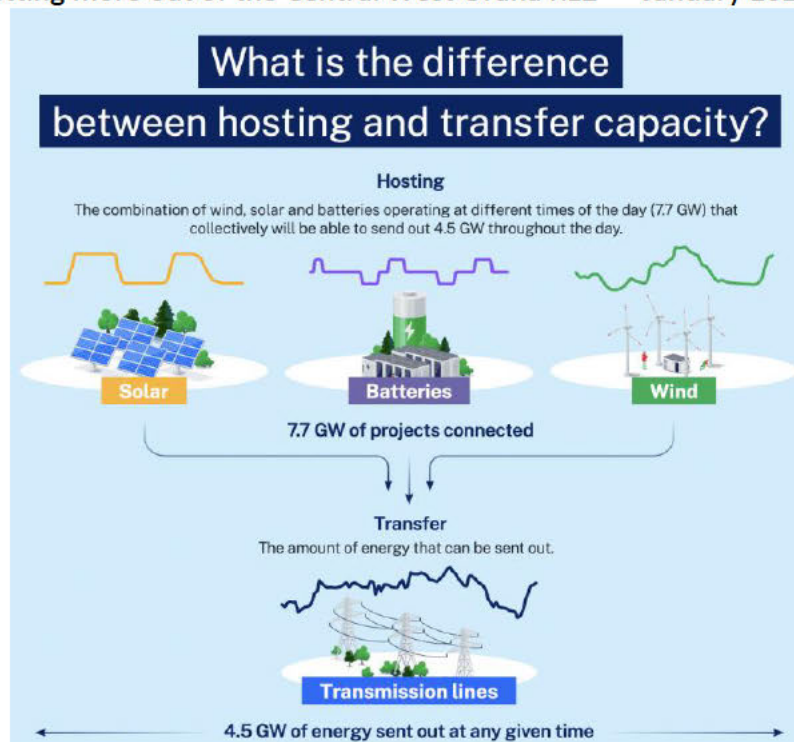
Central-West Orana REZ Project Team
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

www.energyco.nsw.gov.au

Not unlike the CWO REZ declaration amendment I wonder if it is appropriate that EnergyCo is responsible for collating submissions and making the final decision regarding major changes that will ultimately impact the CWO REZ communities. I wonder if, following the headroom assessment, and subsequent increase in aggregate maximum capacity, EnergyCo will admit that the declaration amendment will have a large impact on land use conflict? If you remember correctly, answers received through Budget Estimates from Minister Sharpe stated that “objections largely related to land-use impacts and were not directly related to the proposed declaration amendment.” The way I understand it, the increase in “hosting capacity” will allow more projects to connect to the CWO REZ transmission lines, meaning more large scale infrastructure installed on agricultural land!

Interesting that a fact sheet, explaining the headroom assessment in simplified language “suitable for a general audience”, has been developed and circulated following the decision being made. Does EnergyCo not consider that community members are interested in understanding and being kept apprised of what will be taking place in the region? Or is it concerning that an educated community might be more of a challenge to walk all over?

From EnergyCo’s “Getting more out of the Central West Orana REZ” – January 2025:



As suspected, this is not the last increase in capacity we can expect for the CWO REZ. It is frightening to think that the Minister can make amendments to the REZ declaration without the concurrence of the local population, and the aggregate maximum capacity cap can be increased by EnergyCo in the same manner (see below). Is there any future for the agricultural industry, and rural towns within the Central West Orana REZ?

Future headroom assessments may further increase the aggregate maximum capacity cap

The aggregate maximum capacity cap determined as a result of this headroom assessment **may not be the final limit** on aggregate maximum capacity that may be allocated to generation and storage projects under access rights for the Central-West Orana REZ access rights network. EnergyCo will conduct further headroom assessments as required or permitted by the Access Scheme Declaration, including conducting a headroom assessment as soon as practical following the completion of the initial allocation⁹ and every two calendar years during the period of six calendar years after the initial allocation is complete.¹⁰

Correspondence

EnCo 01.

From:

Subject: CWO REZ

Date: 6 December 2024 at 7:02:06 AM AEDT

To: Ash Albury

Cc: Tim Lang

Hi Ash,

A couple of things.

1. What is the status of the mental health support that has been promised for CWO REZ affected landowners for more than 12 months? Why has nothing been done to assist the Seis family?
2. If not already when will the first round of access rights be awarded for the CWO REZ transmission project? Will those details be made publicly available?
3. The last meeting minutes for the CWO REZ CRG on EnergyCo's website are from July 2024 - has there not been a meeting of the CRG since that time?
4. An update on the renaming of the Merotherie Energy Hub, or at the very least the process that is being undertaken and its status?

Regards,
Emma

Sent from my iPhone

On 13 Dec 2024, at 12:52 PM, Ash Albury

wrote:

Emma,

I have spoken to the team and have the following response to your questions:

1. Landholders and all community members in the Central-West Orana REZ can access free and confidential support by calling an independent hotline, available 24 hours a day and seven days a week on 1300 089 551. EnergyCo is working with key agencies to further support individuals by offering a rebate program in 2025.

As you know we deal directly with landowners but these matters are confidential.

2. EnergyCo is in the final stages of negotiating first round of Access Rights and anticipates making an announcement in early 2025.

3. The most recent regular Community Reference Group (CRG) meeting was held in October. CRG meeting minutes I understand the minutes are on the website. This week there was an extraordinary meeting of the CRG held to discuss the Social Impact Management Plan for the CWO transmission project.

4. EnergyCo is working with project partners and agencies to progress how it may consider a potential name change to Merotherie Energy Hub. This process is underway and will keep you informed on its progress.

Regards

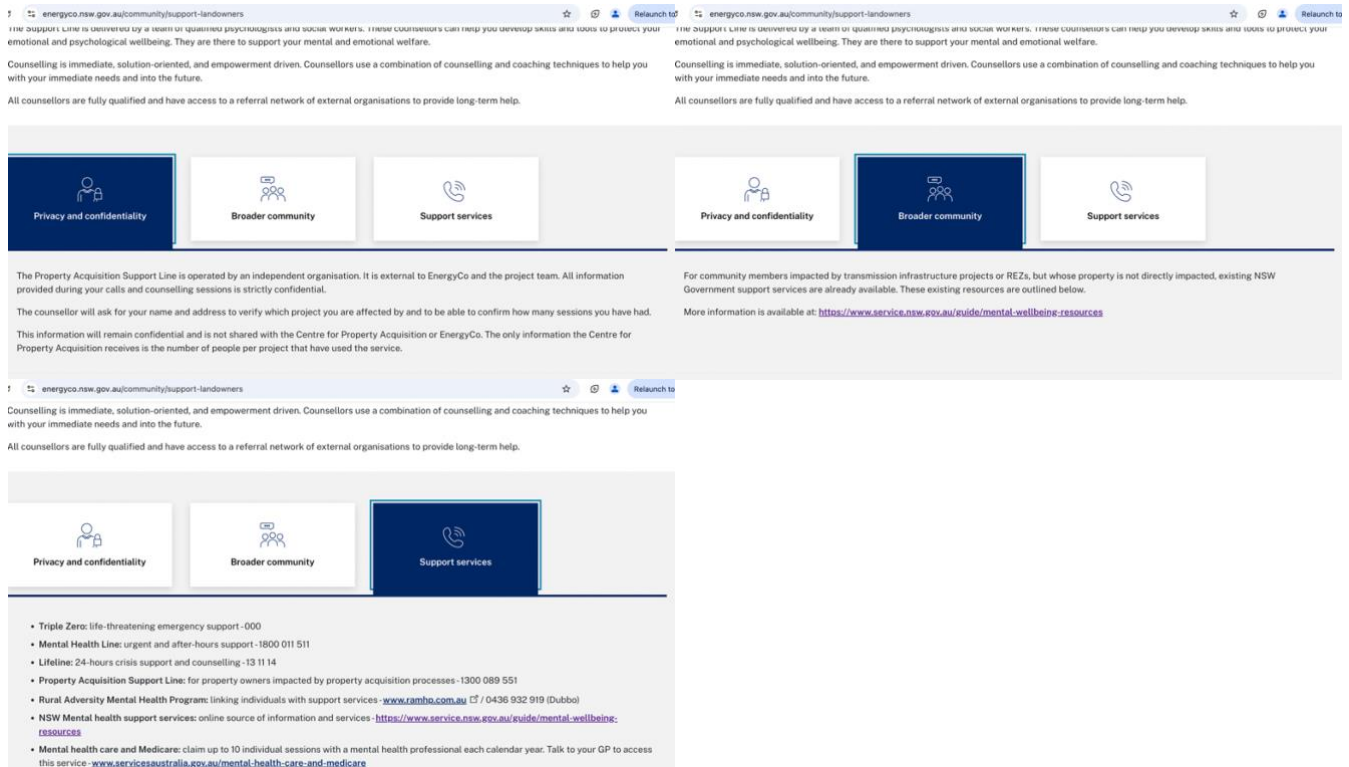
Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

From: Emma Bowman
Subject: Re: CWO REZ
Date: 16 December 2024 at 5:28:01 PM AEDT
To: Ash Albury
Cc: Tim Lang

Ash,

I respectfully ask you to check your facts with regard to the Property Acquisition hotline (1300 089 551). I have just called the number myself and was told that unless I am directly affected by NSW Government Property Acquisition I am not eligible for support through that avenue. I would also suggest that you check the EnergyCo website with regard to this - see below screenshots.



We have been calling for mental health support for inhabitants of the CWO REZ for more than 12 months and EnergyCo, nor the NSW Government, have provided any assistance. It is not acceptable that EnergyCo expect the existing services, which are all under resourced, to manage the impacts directly caused by the rollout of the renewable energy zones.

This is a matter of urgency!!

Regards,
Emma

On 19 Dec 2024, at 9:22 AM, Ash Albury

wrote:

Emma,

Thank you for bringing this to our attention.

We have addressed your concerns and updated our online communications. We have also worked with the relevant government agency responsible to ensure they have comprehensively briefed the third-party entity providing this support service.

EnergyCo apologise you were unable to access the service when you tried to call. I understand how important this service is and understand the frustration this may have caused.

The service provider has offered to contact you directly to provide you access. If you would like this to occur, please advise your preferred contact number which I will share with them.

Regards,

Ash Albury

Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

[W energyco.nsw.gov.au](http://www.energyco.nsw.gov.au)

From: Emma Bowman
Subject: Re: CWO REZ
Date: 19 December 2024 at 5:50:54 PM AEDT
To: Ash Albury
Cc: Tim Lang

Ash,

I should not have had to bring an issue like this “to your attention”. Whose responsibility was it to check that the support service was correctly briefed in the first instance? What do you deem “online communications” - I can see no change in the website stating that any inhabitant of the CWO REZ can access the Property Acquisition Hotline for assistance? When was that initially advertised to the general public?

How many people may have tried to access help and been turned away already before I flagged this issue? It takes a lot of courage to ring and ask for help and one knock back could mean that person never asks again, and ends up falling through the cracks.

I don't believe you have any idea of the frustration any of this has caused, not just for me, but the rest of the impacted communities. It is not acceptable to state that mental health services are being provided when that is not in fact the case! It is gross negligence on the part of EnergyCo and I expect consequences for those responsible.

Emma

EnCo 02.

From: Emma Bowman
Sent: Thursday, October 24, 2024 7:25 PM
To: Ash Albury
Cc: Tim Lang ; James Hay
Subject: EnergyCo CRG Meeting Minutes July 2024

Hi Ash,

Have you any advice on the below statement taken from the EnergyCo Community Reference Group July 2024 Meeting Minutes (page 4)? I do not believe there was a Workforce Accommodation Camp proposed for Elong Elong in the CWO REZ Transmission project EIS.

- Three proposed Workforce Accommodation Camps, as per the EIS: Neeleys Lane, Elong Elong and Merotherie. Stakeholder notifications occurring over the next three to six months to meet conditions of consent.

Can you please advise who is responsible for writing the minutes for the CRG meetings?

Regards,
Emma

From: Ash Albury
Subject: RE: EnergyCo CRG Meeting Minutes July 2024
Date: 25 October 2024 at 5:03:21 PM AEDT
To: 'Emma Bowman'
Cc: Tim Lang

Emma,

You are correct and the EIS only proposes two workforce accommodation camps one at Merotherie and one at Neeley's Lane. It appears that there has been an error and we will issue amended minutes.

Thanks
Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

EnCo 03.

From: EC EnergyCo Port To REZ Mailbox
Subject: 15045 Golden Highway - Essential Energy request for approval to adjust overhead road crossing adjacent to your property
Date: 14 October 2024 at 4:36:58 PM AEDT
To:

Dear Ms Bowman

Please refer to attached letter and documents from Essential Energy regarding work within your property.

Regards

Port to REZ Project Team
Central-West Orana Renewable Energy Zone
Energy Corporation of NSW (EnergyCo)

EnergyCo



Emma Bowman

9 October 2024

Re: Essential Energy request for approval to adjust overhead road crossing adjacent to your property.
Lot11/ DP256482, Lot11/ DP1133117

Dear Ms Bowman

The NSW Government is funding upgrades to the State Road network to enable the movement of oversize and/or over mass (OSOM) loads from the Port of Newcastle to Renewable Energy Zones. Energy Corporation of NSW (EnergyCo) and Transport for NSW are working together to scope and deliver upgrades necessary for transporting OSOM components along identified sections of the State Road network.

EnergyCo has assessed the height of electrical wires along the State Road network between the Port of Newcastle and the Central-West Orana Renewable Energy Zone (REZ). The overhead electrical road crossing adjacent to your property was identified as being too low to accommodate anticipated over size-over mass loads.

An electrical design has been prepared to raise this road crossing. Owners of the power lines, Essential Energy (EE), have requested EnergyCo notify the adjacent landowners and request their signature on EE's Standard Form acknowledging the works.

The form also acknowledges the crew carrying out the work to the electrical adjustment may enter your property to work on the affected power line if necessary. EE standard conditions of entry apply, including sufficient notice and agreement of access point, as per legal requirements.

Enclosed are:

Form CEO9082 – CONSENT FORM – CUSTOMER FUNDED PROJECT

Form CEO9093 – CONSENT SCHEDULE OF WORKS REQUIRED. (This references the design drawing also included that is attached or enclosed).

What do I need to do?

Please complete the Form(s) as follows:

1. CEO9082 - Fill in the owner's name if not already referenced, sign the form and have it witnessed.

The Energy Corporation of NSW (EnergyCo) is part of the Department of Climate Change, Energy, the Environment and Water (DCCCEW)
20 Bond Street,
Sydney NSW 2000
1800 849 794
energyco.nsw.gov.au

1

2. CEO9083 – Completion of this form is OPTIONAL as it is used to outline any special requirements you may have in relation to your property, eg. dog or livestock on property. If you have special requirements, please insert your name and any special requirements in the second box as "details of works required" on this form.

3. Email or post the completed form to:

Email: port2rez@energyco.nsw.gov.au

Post: Attn David Baldock, EnergyCo, Level 19, 20 Bond Street, Sydney, NSW 2001

Why is EnergyCo raising the height of electrical wires?

Major components required for the construction of new renewable infrastructure will need to be transported from the Port of Newcastle to the REZs via the existing road network. The Port to REZ route generally follows the state road network from the Port of Newcastle to the Central-West Orana REZ. This includes sections of the New England Highway, Golden Highway and Castlereagh Highway.

As part of the Port to REZ road upgrades, EnergyCo is raising all overhead electrical wire crossings that may be at risk from over height vehicles.

This ensures continuity of your power supply, rather than require periods of outage for lines to be manually lifted to allow access for each individual over height trip, or unplanned outages to fix low power cables if accidentally struck by over height loads.

What are Renewable Energy Zones?

With ageing coal power stations closing, we need to find new sources of energy for NSW to help our State prosper and keep the light on for energy consumers.

REZs will group new wind and solar power generation into locations where it can be efficiently stored and transmitted across NSW. REZs will keep NSW electricity reliable as coal-fired power stations retire, delivering large amounts of new energy to power our regions and cities.

EnergyCo is the Infrastructure Planner responsible for coordinating the development of the REZs.

For more information, please visit the EnergyCo website <https://www.energyco.nsw.gov.au/port2rez>

If you have any questions or need assistance about the forms or the work, please call or email me (details below).

I look forward to receiving the executed form.

Sincerely,

David Baldock

Utilities Manager, Central-West Orana REZ

The Energy Corporation of NSW (EnergyCo) is part of the Department of Climate Change, Energy, the Environment and Water (DCCCEW)
20 Bond Street,
Sydney NSW 2000
1800 849 794
energyco.nsw.gov.au

2

On 17 Oct 2024, at 9:29 AM, David Baldock

wrote:

Emma, as per our phone conversation today, can you please confirm you will not be signing the Essential Energy (EE) Permission to Enter Form to allow EnergyCo access to your land to adjust cables on the EE power pole nearest Golden Hwy.

Thanks for your time to discuss this.

Dave Baldock

Principal Advisor – Infrastructure Advisory

Alexandra Venice Consulting

From: Emma Bowman

Sent: Thursday, 17 October 2024 11:22 AM

To: David Baldock

Subject: Re: Permission to Enter for tightening overhead Xing E019

Dear David,

As discussed on the phone this morning I, Emma Bowman, as the owner of _____, will not be signing the Essential Energy Consent Form which states “the proposed works cannot start unless Essential Energy has received a copy of this form signed by the landowner”. I do not give permission for Transport for NSW (TfNSW) or The Energy Corporation of NSW (EnergyCo) or any consultants, contractors or subcontractors engaged by TfNSW or EnergyCo to enter my property at any time and will have charges prosecuted if there is any trespassing.

Yours sincerely,
Emma Bowman

On 17 Oct 2024, at 3:21 PM, David Baldock _____ wrote:

Thanks Emma – clear enough.

Dave Baldock
Principal Advisor – Infrastructure Advisory

Alexandra Venice Consulting

From: Emma Bowman
Sent: Thursday, 17 October 2024 6:32 PM
To: David Baldock
Subject: Re: Permission to Enter for tightening overhead Xing E019

Hi David,

Could you please provide me evidence, in writing, that Transport for NSW (TfNSW) and The Energy Corporation of NSW (EnergyCo) have been notified of my decision below?

Regards,
Emma

From: David Baldock
Subject: RE: Permission to Enter for tightening overhead Xing E019
Date: 18 October 2024 at 7:54:09 AM AEDT
To: Emma Bowman

Emma, EnergyCo have been notified, and TfNSW will be.

Thanks

Dave Baldock
Principal Advisor – Infrastructure Advisory

Alexandra Venice Consulting

EnCo 04.

-----Original Message-----

From: Emma Bowman

Sent: **Monday, October 7, 2024 2:44 PM**

To: Ash Albury

Cc: Tim Lang ; James Hay

Subject: Energy Hub renaming

Ash,

Could you please provide an update on the potential renaming of the Merotherie Energy Hub?

I note that in an email dated 31st May 2024 you wrote "Regarding the naming of the Merotherie Energy Hub, the name was originally used as this was the locality of the Hub. EnergyCo has committed to reviewing the name of the Energyhub with a view to changing it. In order to do this we are going to undertake community consultation and are hoping to undertake this in the second half of this year."

Regards,

Emma

From: Ash Albury

Date: **Tuesday, 8 October 2024 at 8:30 am**

To: 'Emma Bowman'

Cc: Tim Lang , James Hay , Amer Hussein

Subject: RE: Energy Hub renaming

Emma,

Thanks for your email I will refer your email to Amer Hussein who is undertaking this piece of work.

Amer, can you please respond to Emma's email.

Thanks

Ash

Ash Albury

Executive Director

Planning and Communities

Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

From: Amer Hussein <amer.hussein@dpie.nsw.gov.au>

Subject: **Re: Energy Hub renaming**

Date: **15 October 2024 at 6:55:09 AM AEDT**

To: Ash Albury 'Emma Bowman'

Cc: Tim Lang James Hay

Dear Emma

Thank you for following up regarding the Merotherie Energy Hub.

EnergyCo consulted with specific landowners to discuss name changes and their potential options. An alternate name was suggested however deemed unsuitable after further investigation.

The name 'Merotherie' was chosen as the energy hub is located on land that is registered in the Merotherie Parish, listed in the NSW Land Registry. This name ensures clear identification for essential or emergency services, allowing for swift responses if ever required.

The outcome of this assessment has been shared with the landowners who have agreed with EnergyCo's decision to retain the name.

Best wishes
Amer

Amer Hussein

Community and Place Director, Central-West Orana REZ

Energy Corporation of NSW (EnergyCo)

Department of Climate Change, Energy, the Environment and Water

[W dcceew.nsw.gov.au](https://www.dcceew.nsw.gov.au) [W energyco.nsw.gov.au](https://www.energyco.nsw.gov.au)

From: Amer Hussein

Subject: Recall: Re: Energy Hub renaming

Date: 15 October 2024 at 10:59:50 AM AEDT

To:

Cc:

would like to recall the message, "Re: Energy Hub renaming".

From: Emma Bowman

Subject: Re: Energy Hub renaming

Date: 15 October 2024 at 2:11:50 PM AEDT

To: Amer Hussein

Cc: Ash Albury, Tim Lang, James Hay

Hi Amer,

Could you please advise how the 'specific landowners' EnergyCo discussed the potential name change with were identified and how many there were? What was the alternative name suggested and why was it deemed unsuitable, and by whom?

I take issue with your assumption that the use of the name Merotherie will assist essential and emergency services. Whilst the parish names were used in the past you will find our addresses are now based around the town or village we live closest to, for example - the address of the property purchased for the energy hub is "Round Camp", 1085 Birriwa Bus Route South, Dunedoo NSW, maybe even

sometimes Birriwa NSW. The road numbers came into play several years ago in an attempt to assist emergency services in finding rural properties.

I note you stated that the “outcome of this assessment has been shared with the landowners who have agreed with EnergyCo’s decision to retain the name” - does this statement suggest only landowners who agreed with the decision were notified, or that all landowners consulted agreed to the decision to retain the name?

Could you also please advise why I received the following via email at 11:01am this morning?
would like to recall the message, "Re: Energy Hub renaming".

Regards,
Emma

From: Emma Bowman
Sent: Thursday, October 24, 2024 7:28 PM
To: Ash Albury
Cc: Tim Lang ; James Hay
Subject: Fwd: Energy Hub renaming

Hi Ash,

I am still waiting for a response from Amer to the email below, especially my last question regarding the “recall” of his original reply.

Regards,
Emma

From: Ash Albury
Subject: RE: Energy Hub renaming
Date: 25 October 2024 at 5:08:27 PM AEDT
To: 'Emma Bowman'
Cc: Tim Lang , James Hay , Amer
Hussein

Amer,

Could you please provide a response to Emma.

Thanks
Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

From: Emma Bowman
Date: Tuesday, 5 November 2024 at 4:59 pm
To: Ash Albury
Cc: Tim Lang

Subject: Re: Energy Hub renaming

Ash,

Still no reply from Amer.

Regards,
Emma

Sent from my iPhone

From: Amer Hussein
Subject: Re: Energy Hub renaming
Date: 11 November 2024 at 10:01:36 AM AEDT
To: Emma Bowman

Hi Emma

EnergyCo is understanding how it may facilitate a change to 'Merotherie Energy Hub' and investigating alternate names. The team will revert with more information and next steps as it becomes available.

Thank you for your patience.

Best wishes
Amer

Amer Hussein

Community and Place Director, Central-West Orana REZ

Energy Corporation of NSW (EnergyCo)

Department of Climate Change, Energy, the Environment and Water

W dcceew.nsw.gov.au **W** energyco.nsw.gov.au

From: Emma Bowman
Subject: Re: Energy Hub renaming
Date: 11 November 2024 at 8:18:07 PM AEDT
To: Amer Hussein
Cc:

Hi Amer,

I note that you have still not answered my questions that arose following your email on the 15th of October where you stated that the name Merotherie would be retained. I would appreciate an explanation as to what changed so soon after sending the aforementioned email?

Who is EnergyCo consulting with regarding the current potential name change? What is different compared to the previous discussions regarding the potential name change?

Regards,
Emma

EnCo 05.

On 7 Aug 2024, at 8:23 PM, Emma Bowman wrote:

Dear Gerard,

Please find attached photos of a vehicle that crashed into a tree on the Merotherie Road in late June 2024.

Can you please advise if this vehicle is associated with the Central West Orana REZ Transmission project?

Regards,
Emma

On 8 Aug 2024, at 11:50 AM, Gerard Reiter wrote:

Hi Emma,

Thank you for your email. I was not notified of an incident I will investigate and let you know.

Best Regards

Gerard

On 12 Aug 2024, at 10:57 AM, Emma Bowman wrote:

Hi Gerard,

Any update on the below?

Thanks,
Emma

On 12 Aug 2024, at 11:07 AM, Gerard Reiter wrote:

Hi Emma,

Yes I checked with our team. We do not have any record of an incident and I understand that this group are not working on the project.

Perhaps you could contact the company directly.

Best Regards

Gerard

From: Emma Bowman
Subject: Re: EnergyCo contractors
Date: 25 August 2024 at 4:07:36 PM AEST
To: Gerard Reiter
Cc: Ash Albury

Hi Gerard,

With regard to the below incident, and ACERESZ's ongoing work on the project site, I wonder if you can inform me how a member of the public is expected to keep apprised of movements on local roads of permitted vehicles? I.e. conditions of consent for the CWO REZ transmission project are very clear regarding transport routes etc. - community members have been repeatedly told we can make a complaint if we believe the project workforce is not using the permitted routes. How is any community member able to ascertain if vehicles using specific local roads are associated with the CWO REZ transmission project if they are not informed which companies are working on the project?

Regards,
Emma

EnCo 06.

-----Original Message-----

From: Emma Bowman
Sent: Tuesday, August 6, 2024 2:18 PM
To: Ash Albury
Subject: Regional Reference Group

Hi Ash,

Can you please advise who the members of the CWO REZ Regional Reference Group were? I believe it then became the Industry Working Group.

And, of any meetings or minutes that are available for this group?

Regards,
Emma

From: Ash Albury
Subject: RE: Regional Reference Group
Date: 6 August 2024 at 2:20:04 PM AEST

To: 'Emma Bowman'

Anissa/Amer,

Could you please respond to Emma.

Thanks

Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

From: EC EnergyCo Central-West Orana Mailbox

Subject: Regional Reference Group

Date: 8 August 2024 at 10:23:29 AM AEST

To: Emma Bowman

Hi Emma,

I'm responding to your email to Ash Albury on 6 August 2024 regarding the Central-West Orana Renewable Energy Zone Regional Reference Group (RRG).

The RRG preceded EnergyCo's role as Infrastructure Planner for Renewable Energy Zones.

The forum was part of the NSW Government's commitment to engage with the community, landowners and other interested stakeholders about the development of the REZ.

The standing membership comprised of councils in the Central-West region, select electricity transmission providers and the then Department of Regional NSW.

The forum concluded in 2022. Minutes for this forum were not publicly available.

Kind regards,

Anissa Baiquni

Senior Manager Community & Stakeholder, Central-West Orana REZ

Energy Corporation of NSW (EnergyCo)

Office of Energy and Climate Change

P 1800 032 101 (9am-5pm, Monday to Friday) | **E** cwo@energyco.nsw.gov.au

W energyco.nsw.gov.au

From: Emma Bowman

Sent: Friday, 9 August 2024 8:52 AM

To: EC EnergyCo Central-West Orana Mailbox
Cc: Ash Albury
Subject: Re: Regional Reference Group

Hi Anissa,

Thank you for your response.

Can you please advise how the Regional Reference Group "engaged with the community, landowners and other interested stakeholders about the development of the REZ"? Meeting and consultation dates and attendees?

Could you also please be more specific in regard to the members of the Regional Reference Group? I.e. which Councils had representatives within the forum, and how many? Which electricity transmission providers were members? And how many staff, and in what roles, from the then Department of Regional NSW were members?

Could you also please provide the date of inception of the Regional Reference Group and date of conclusion?

Regards,
Emma

From: EC EnergyCo Central-West Orana Mailbox
Subject: Re: Regional Reference Group
Date: 12 August 2024 at 10:22:00 AM AEST
To: Emma Bowman
Cc: Ash Albury

Hi Emma

I acknowledge receipt of your email.

We are working to respond to your questions and endeavour to get back to you in the next week.

Thank you in advance for your patience.

Regards
Anissa Baiquni
Senior Community and Stakeholder Engagement Manager, Central-West Orana REZ
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

P 1800 032 101 (9am-5pm, Monday to Friday) | E cwo@energyco.nsw.gov.au
W energyco.nsw.gov.au

From: Emma Bowman
Sent: Wednesday, August 21, 2024 12:21 PM
To: Anissa Baiquni
Cc: Ash Albury
Subject: Re: Regional Reference Group

Hi Anissa,

Could you please provide a response to my queries below at your earliest convenience?

Regards,
Emma

On 22 Aug 2024, at 11:00 am, Anissa Baiquni

wrote:

Hi Emma

Acknowledging receipt of your follow up email.

I assure you that we are currently working on a response. I do appreciate your patience in the meantime.

Kind regards
Anissa

From: Emma Bowman
Sent: Wednesday, August 28, 2024 3:13 PM
To: Anissa Baiquni
Cc: Ash Albury
Subject: Re: Regional Reference Group

Hi Anissa,

Following up again regarding my request below.

I have been more than patient waiting for a response to my queries so I would appreciate the requested information by the end of this week.

Regards,
Emma

Sent from my iPhone

From: Anissa Baiquni
Subject: FW: Regional Reference Group
Date: 28 August 2024 at 5:30:07 PM AEST
To: 'Emma Bowman'
Cc: Ash Albury

>

Hi Emma

Thanks for your email.

The forum ran from October 2020 to April 2021.

Membership of the Regional Reference Group was as below:

Organisation	Organisation
Local Members of Parliament (State and Federal)	Warrumbungle Shire Council
Orana Joint Organisation of Councils	Warren Shire Council
Dubbo Regional Council	Liverpool Plains Shire Council
Gilgandra Shire Council	Coonamble Shire Council
Mid-Western Regional Council	TransGrid
Narromine Shire Council	Essential Energy
Upper Hunter Shire Council	Department of Regional NSW

In addition to the above, stakeholders were invited to attend as appropriate including: Business chambers, NSW Farmers, Regional Development Australia, Landcare, Agriculture Commissioner, Community and Indigenous representatives.

Regarding the minutes, these were not made publicly available and preceded EnergyCo's role as Infrastructure Planner in the REZ.

Kind regards
Anissa

On 28 Aug 2024, at 8:24 PM, Emma Bowman

wrote:

Hi Anissa,

Can you please confirm the dates that the CWO REZ Regional Reference Group was operational? Your most recent email states October 2020 to April 2021, however your previous response (received on 8th August) states "the forum concluded in 2022".

Seeing as minutes are not publicly available could you please provide dates and locations of CWO REZ RRG meetings? And, attendees (if names are not able to be provided could you please list the numbers from each organisation and/or community and indigenous representatives)?

I would appreciate a prompt reply.

Regards,
Emma

From: Emma Bowman

Sent: Thursday, September 5, 2024 12:15 PM

To: Anissa Baiquni

Cc: Ash Albury ; Tim Lang

Subject: Re: Regional Reference Group

Hi Anissa,

Still awaiting your reply on the below. Would appreciate your prompt reply.

Regards,
Emma

From: Anissa Baiquni

Subject: RE: Regional Reference Group

Date: 9 September 2024 at 4:34:36 PM AEST

To: Emma Bowman

Cc:

Hi Emma

I confirm that the CWO RRG concluded in 2022.

I've provided a list of the known meeting occurrences and the organisations in attendance below. At least one person attended from each organisation.

Date	Meeting location	Organisations in attendance	Apologies	Comments
29 October 2020	Dubbo	DPIE Department of Regional NSW Dubbo Regional Council Narromine Regional Council Gilgandra Shire Council Transgrid Essential Energy Mid-Western Regional Council Upper Hunter Council Coonamble Shire Council National Wind Farm Commissioner Office for Member for Dubbo Office for the Hon Andrew Gee MP	Office of Member for Barwon Office of Member for Parkes Office of the Hon Ben Franklin Orana Joint Organisation of Councils Liverpool Plains Shire Council Warrumbungle Shire Council Warren Shire Council	
22 February 2021	Dubbo	DPIE Office of Member for Dubbo Department of Regional NSW Dubbo Regional Council National Indigenous Australians Agency Mid-Western Regional Council Upper Hunter Shire Council Transgrid Essential Energy	Office of Member for Barwon Office of the Hon Ben Franklin Office of Member for Parkes Office of Member for Calare Orana Joint Organisation of Councils NSW Aboriginal Land Council Narromine Regional Council Liverpool Plains Shire Council Warren Shire Council Gilgandra Shire Council Warrumbungle Shire Council Coonamble Shire Council National Wind Farm Commissioner Mining and Energy Related Councils	
2 June 2021	Dubbo	Office for Member for Dubbo DPIE Warren Shire Council Dubbo Regional Council Upper Hunter Shire Council National Indigenous Australian Agency Dubbo Local Aboriginal Land Council	Apologies were not listed	

		Mudgee Local Aboriginal Land Council Transgrid Essential Energy Department of Regional NSW NSW Department of Primary Industries		
14 October 2021	Virtual	DPIE EnergyCo Dubbo Regional Council Upper Hunter Shire Council Liverpool Plains Shire Council Mid-Western Regional Council Warrumbungle Shire Council Warren Shire Council Coonamble Shire Council Transgrid Essential Energy Department of Regional NSW NSW Department of Primary Industries Office of the Hon. Mark Coulton MP National Indigenous Australian Agency Wellington Local Aboriginal Land Council Trangie Local Aboriginal Land Council Australian Energy Infrastructure Commissioner	Office of Member for Dubbo Office of the Hon Ben Franklin NSW Aboriginal Land Council Central Region	
5 April 2022				Meeting took place on this date, though minutes cannot be located.

Regards
Anissa

EnCo 07.

-----Original Message-----

From: Emma Bowman

Sent: Saturday, 29 June 2024 3:46 PM

To: Ash Albury

Subject: EnergyCo Contracts

Hi Ash,

Is EnergyCo or ACERREZ responsible for contractors currently working on the CWO REZ transmission project? If EnergyCo, is there information about who has been awarded contracts already publicly available?

Regards,
Emma

On 1 Jul 2024, at 7:39 AM, Ash Albury

wrote:

Emma,

Hope you are well, I will refer your question to Gerard Reiter who is the Project Director for the Central West Renewable Energy Zone.

Gerard,

Please find below an email from Emma could you please provide a response.

Thanks

Ash

Ash Albury

Executive Director

Planning and Communities

Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

On 1 Jul 2024, at 9:15 am, Gerard Reiter

wrote:

Hi Ash,

Thanks for reaching out.

@Emma just want to understand what information you are after. Are there particular contractors you are interested in ie: people who are currently working or are you after contracts that come up in future?

Best Regards

Gerard

On 1 Jul 2024, at 10:16 AM,

wrote:

Hi Gerard,

I was wanting information on contracts that have already been awarded ie. those who may already be working on site or have an agreement to do so.

Just after what the contract is and who it was awarded to if possible please?

Thanks,

Emma

Sent from my iPhone

On 3 Jul 2024, at 2:47 PM, Emma Bowman

wrote:

Hi Gerard,

Is the below information requested publicly available?

Regards,
Emma

On 4 Jul 2024, at 10:23 AM, Gerard Reiter

wrote:

Hi Emma,

I am just following up the information for you and will revert once I have it from the team.

Best Regards

Gerard

On 15 Jul 2024, at 3:35 PM, Emma Bowman

wrote:

Hi Gerard,

Just following up regarding the below. Any information available as yet?

Regards,
Emma

On 15 Jul 2024, at 5:02 pm, Gerard Reiter

wrote:

Hi Emma,

Yes I followed up. I thought some information had been sent through already. Let me check with the team.

Best Regards

Gerard

On 15 Jul 2024, at 6:04 PM, Emma Bowman

wrote:

I haven't received anything.

Sent from my iPhone

On 22 Jul 2024, at 3:21 PM, Emma Bowman

wrote:

Hi Gerard,

Another week on and I still have not heard anything. If the information is not available from EnergyCo please say as much so I can look for alternatives to finding what I would like to know.

Awaiting your reply.

Regards,
Emma

From: Gerard Reiter
Subject: Re: EnergyCo Contracts
Date: 22 July 2024 at 4:16:23 PM AEST
To: Emma Bowman

Hi Emma,

Apologies for the delay. The team confirmed the following.

The Network Operator has commenced early site establishment works. These works include geotechnical, noise and vibration modelling for the Merotherie site.

As early and construction works continue, the Network Operator will advertise all upcoming work packages on ICN Gateway.

The Network Operator does not publicly share subcontractors' information, however if there are any concerns please let me know.

I hope that this answers your question.

Regards
Gerard

EnCo 08.

From: Emma Bowman
Sent: Thursday, 15 February 2024 12:19 PM
To: Ash Albury
Cc: ElectorateOffice Dubbo
Subject: CWO REZ issues

Hi Ash,

A couple of points I did not get to yesterday.

- Merotherie Road flood plain - the access route to the main energy hub is along Merotherie road - 1.7km of which is a flood plain. Upgrading that road with culverts or other man made engineering solutions and replacing the bridge will potentially affect the whole Talbragar River system. This deems the main energy hub site unsuitable which is a problem we have been raising since the energy hub site was revealed. I discussed this at length with Brian Cullinane at an EIS drop in session in Dunedoo and informed him that road would not be upgraded - I can only assume that message wasn't received up the food chain either?
- Cumulative impact reports - I understand EnergyCo have had CWO REZ cumulative impact reports completed. Where can I find these? Do these address all projects within the REZ boundary or just those connecting to EnergyCo transmission lines?

- Please find attached social impact study completed by PWC for the Mid Western Regional Council. This report was compiled at Council's cost to demonstrate the issues the REZ will have on MWRC communities. How do smaller Councils afford to have such studies completed? EnergyCo, as the CWO REZ infrastructure planner should be identifying any possible issues and have them resolved prior to any project approval!
- We briefly discussed the REZ wide accommodation strategy - I was told tenders should be out for that by the end of 2023? Could I please have more information on this? We have projects currently proposing amendments for TWA because there is no REZ wide strategy available - is this another cart before the horse EnergyCo project?
- Insurance liability - we have asked numerous times about the possible insurance liability for landowners with regard to the multimillion dollar projects they are being forced to neighbour. Our public liability policies are generally \$20 million - can we be assured that an accidental fire that damages a project or transmission lines will not cause us to lose our properties due to the possible damage bill?

Regards,
Emma

From: Ash Albury
Subject: RE: CWO REZ issues
Date: 15 February 2024 at 2:01:34 PM AEDT
To: Emma Bowman
Cc: ElectorateOffice Dubbo

Thanks Emma will add them to the list

Ash Albury
 Executive Director
 Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

Executive Coordinator: Bernadette Pirihi

The Energy Corporation of NSW (EnergyCo) is part of the **Department of Climate Change, Energy, the Environment and Water (DCCEEW)**.

-----Original Message-----

From: Emma Bowman
Sent: Thursday, 22 February 2024 8:17 AM
To: Ash Albury
Cc: Roy Butler MP

Subject: EnergyCo 2022-23 Annual Report

Hi Ash,

The EnergyCo Annual Report 2022-2023 states that “EnergyCo has developed a draft biodiversity offset strategy for the REZ network infrastructure project” for the CWO REZ. Could you please let me know where I can find this document?

The report also states that “EnergyCo has continued to investigate telecommunications upgrades in the REZ”. Could you please provide an update on these investigations?

Could you please provide any information you have around the Transmission Acceleration Fund (TAF)? Or point in me in the right direction to find it?

Could you please also provide a copy of the Memorandum of Understanding with DPHI that was developed to improve assessment timeframes and reduce development application fees for REZ projects?

Is there an update on CWO REZ Access Rights?

What funds have been spent on the CWO REZ to date?

Regards,
Emma

From: Ash Albury
Subject: RE: EnergyCo 2022-23 Annual Report
Date: 22 February 2024 at 8:20:59 AM AEDT
To: Emma Bowman
Cc: Roy Butler MP

Good Morning Emma,

Looks like a cracking day, let me review this with the team and I will get back to you.

Thanks
Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

The Energy Corporation of NSW (EnergyCo) is part of the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

From:
Subject: CWO REZ questions - EnergyCo

Date: 25 February 2024 at 11:45:22 PM AEDT

To: Ash Albury

Cc:

Ash,

Whilst the process of responding to the multitude of questions I have posed may have served to educate you, due to the time you have been in your role, the only thing that's new to me is the Draft Access Scheme and Guidelines being on display at present. So while I thank you for that knowledge I am still none the wiser about any of the questions that you have "answered" to date, most of which have been asked over the past 12 months in phone calls, emails and at "drop in sessions" to ground staff and Mike Young, without adequate reply. Were none of these issues being raised with the most senior staff and the Minister or just being ignored due to their difficulty?

As discussed, almost every time we have spoken, the process for concerned community members getting information is tedious and lengthy and quite honestly akin to drawing blood from a stone, while EnergyCo, and the state government processes move at breakneck speed PRIOR TO adequate investigation or knowledge being gained around the potential cumulative impacts and impacts on affected communities of Renewable Energy Zones, and/or the greater "rapid transition to renewable energy". There should have been whole of REZ impact assessments carried out PRIOR TO any REZ declaration to ensure the cumulative effects on the regions affected would not be to their detriment.

Cumulative Impacts

On Friday afternoon you stated that cumulative impacts are referenced in Appendix E of the CWO REZ Transmission project EIS. While that statement is true that is not the level of in depth information I am seeking. I have asked for whole of REZ impact assessments on accommodation, water use and social impacts. As you are aware Mid Western Regional Council commissioned their own impact assessment, but smaller LGA's lack the funds or capacity to carry these out themselves - not that I believe the larger LGA's should be footing the bill for such studies given EnergyCo is the infrastructure planner so should have this knowledge PRIOR TO any progression. I want to see water use figures, by project and cumulatively, so we, as farmers and community members can be assured our stock and domestic water sources will not run dry during the next 10 years. Whilst there might be unused allocation that does not mean construction water use won't have negative impacts on our water tables and cause potential devastation to livestock producers who can no longer water sheep or cattle, not unlike those affected by the mines in the Boggabri and Gunnedah region. How many extra police officers, nurses, doctors, paramedics, fire fighters and other emergency service personnel will our district need to cater for the major influx in population or will we be forced to go without adequate services? There are temporary workers accommodation camps being proposed in most developer applications, or amendments being made to cater for a TWA due to no work being completed to date on a whole of REZ workers accommodation strategy - why wasn't this done when the REZ was declared?

There should also be whole of REZ impact assessments on bushfire risk and fire fighting, waste and waste water, visual amenity and noise, biodiversity, economics, traffic and transport and flooding, just for a start. All works should cease until these reports are made publicly available and impacts solved or mitigated.

Appendix E states "as Infrastructure Planner for the Central-West Orana Renewable Energy Zone (REZ), EnergyCo will coordinate transmission, generation, firming and storage projects to deliver efficient, timely and coordinated investment. In this capacity, EnergyCo is taking a leading role in the coordination

of impacts and benefits to communities who will be hosting renewable generation and transmission infrastructure.” Where is the coordination to this point?

Biodiversity

In my opinion, a draft biodiversity offsets strategy could be released to the public with any sensitive personal information redacted. Is this information not available due to covert negotiations between landowners and EnergyCo? Will those landowners who agree to host a biodiversity offset site be better compensated than those having easements compulsorily acquired to “host” transmission lines?

Is it really acceptable to claim already existing ecosystems as suitable compensation for the destruction of others? I believe any biodiversity offsets should call for replacements to be established prior to the annihilation of habitat or vegetation ie. if there are ten trees to be removed, there should be ten trees planted, and grown to a similar life stage (eg. half grown or fully grown) before any clearing takes place.

Telecommunications

Telecommunications is definitely a “key priority for local communities” but again, this work should be carried out PRIOR TO the major increase in population predicted for the construction of CWO REZ projects. From my house I can see two telephone towers but we have a booster to make our service more reliable. It is very obvious when a bulk of people are using data; it would be faster to run to the library and hire an encyclopaedia than do a google search!

We know what the service in this area is like during an emergency; we faced it during the Sir Ivan Bushfire in 2017. We often had no mobile phone coverage which meant a lot of people did not know if family members were safe for hours, if not days, and those who were issued evacuation text messages either did not receive them, or received them days after the immediate threat had passed. This is not good enough!

Better telecommunications coverage should not come as a “community benefit” of bearing the brunt of the “rapid transition to renewable energy”, it is a service, like roads and health, that we as Australian citizens pay taxes to receive.

You have stated that “more information will be shared once we have tangible options to discuss with local communities”. How long will this take? What input will local communities get? Will any value be placed on local feedback?

MOU's

I am extremely concerned that EnergyCo and the DPE (now DPHI) were permitted to sign such an understanding - reducing application fees for large scale renewable energy and storage projects in the REZ's" and “ensuring the Department has the resources needed to handle the increase of renewable projects coming through the system”. You have been made aware of how much faith community members have in EnergyCo in the CWO REZ, so to have an MOU with DPHI that is not publicly available begs the question of what there is to hide?

TAF

Please direct me to any documented evidence of “early work in the REZ's”?

I understand the Transmission Acceleration Facility was established in the 2022-23 Budget to provide additional funding to support the NSW Government's Electricity Infrastructure Roadmap. Over 10 years a total of \$2.6 billion in capital and \$425 million in expenses is planned. Development funding supported by the facility is intended to be recovered from private investors to support further projects until final

repayment in 2040. I am not instilled with any confidence knowing the facility is administered by EnergyCo - how transparent will this administration be? Who is in charge of this administration?

I do wonder where the money to “help rescue NSW’s energy transition”, “put the renewable energy roadmap back on track”, “accelerate the transition to renewables” and “reignite the first of our Renewable Energy Zones in the Central West Orana” has been ‘borrowed’ from?

Access Scheme

Again, the updated Access Scheme Declaration and Draft Guidelines seem to hasten the process for EnergyCo and developers.

When will a CWO REZ map, with all renewable energy projects, whether connecting to the CWO REZ transmission project or not, be made available publicly? It would be beneficial to have a list including developer contact, size (MW and footprint in ha), construction length and timing, number of workers, water use, traffic movements etc. Community members need to be able to find all of this information in one place and as infrastructure planner for the REZ I believe it should be part of EnergyCo’s role.

You stated on Friday afternoon on the phone you would send through information on the other issues I have raised (in emails and in Dugald Saunders’ office ten days ago) as it comes to hand. I hope it is more comprehensive than what you have already sent.

The Merotherie Road flood plain and possible road works is a major issue. I would like that information by the middle of the week coming and it needs to state the process that the road works are being assessed through and what stage it is at. I would also like any information available about the upgrades that would be needed for the Golden Highway?

The other issue that needs to be dealt with this week is the EnergyCo employee lying to the 'new' neighbour of the Neeley’s Lane, Cassilis proposed workers camp regarding community/neighbour perception of the site. Personally, I have detailed several similar occurrences to EnergyCo staff that are either not investigated, and/or have no ramifications for the offending members of staff/consultants. It is not an acceptable way to treat landowners or community members and goes a long way to explaining the hostility toward EnergyCo.

Regards,
Emma

From: Emma Bowman

Subject: Community and Employment Benefit Program Drop In Sessions

Date: 29 February 2024 at 3:32:06 PM AEDT

To: Ash Albury

Cc:

Dear Ash,

I have previously expressed to you my disappointment that following the cancellation of the paid community workshops (that were not transparently advertised with EnergyCo’s involvement) there was no consultation with affected communities regarding how they would like to be engaged about the Community and Employment Benefit Program before the drop in sessions were announced. (Please find more information on this in the attached document.)

I attended the drop in session held in Dunedoo on Monday 26th February. One of the biggest concerns that came out of that session was the lack of note taking from EnergyCo staff when speaking with community members. There was a lot of important information being shared during a group conversation with Thomas Watt shortly after the session began and the amount of information could not have possibly been retained adequately, yet to my knowledge there was no note taking happening. Thomas informed us that there would be a report compiled following the drop in sessions that would be used to advise Minister Sharpe. How can community members be assured their feedback is being adequately represented to the Minister?

Regards,
Emma

From: Emma Bowman
Subject: Re: CWO REZ questions - EnergyCo
Date: 29 February 2024 at 4:16:15 PM AEDT
To: Ash Albury
Cc: Bernadette Pirihi

Hi Ash,

Following from my email below sent on Sunday 25th February, which I can only assume you received at work on Monday 26th February, I tried to ring your mobile yesterday and earlier today to discuss the matters I am awaiting action on. I am yet to receive a reply to my email below to acknowledge receipt or address any of the outstanding issues. I will be very disappointed and frustrated if yet another week goes by without any adequate response to my concerns, both discussed below and in previous correspondence.

I have been made aware that

I am yet to see any public announcement from EnergyCo regarding this, or a replacement, so who is the suggested port of call for community members who had built a relationship with in her role?

Eagerly awaiting your reply.

Regards,
Emma

From: Ash Albury
Subject: Reply to Questions
Date: 8 March 2024 at 5:47:21 PM AEDT
To: Emma Bowman
Cc: James Hay

Hi Emma

Thank you for your email.

To make it easy to recap your incoming correspondence and answers, I have created the attached table and answered the questions sequentially, even when you may have had a response from former EnergyCo employees previously so you and I are both on the same page. Some questions have been answered directly by Marcus, and this table notes that where relevant.

Hopefully this now makes it clearer what has been covered and we can easily refer to this as we continue to engage with you.

Kind Regards,
Ash

Ash Albury

Executive Director

Planning and Communities

Energy Corporation of NSW (EnergyCo)

[W energyco.nsw.gov.au](http://www.energyco.nsw.gov.au)

Executive Coordinator: **Bernadette**
E

From: Emma Bowman

Subject: Re: Reply to Questions

Date: 12 March 2024 at 12:05:36 PM AEDT

To: Ash Albury

Cc: James Hay

Hi Ash,

With reference to point two in your table I was referring to contact/negotiations between transmission affected landowners and ACEREZ (which was the subject of the email but my apologies for not making it clearer throughout the email content).

Issue 8 - attached are the two email chains between myself and Marcus McClintock regarding tax implications of compensation. Are these considered adequate answers to my questions, especially considering my last email, from early February is still unanswered by Marcus? The response provided by you does not address the issue of a possible difference between a voluntary agreement or compulsory acquisition or what type of income the compensation will be classed as - that does not differ between businesses.

Issue 11 - is there more information than what is contained in the amendment documents?

Issue 13 - telecommunications, like many other lacking services we have in rural and regional NSW, should not be a "benefit to be delivered in the REZ" - these are a right for those of us who have, and will continue to pay taxes as Australian citizens.

Issue 23 - the EnergyCo CWO REZ interactive map does not provide a view of the size of all of the projects within the REZ boundary - only the CFG's.

Issue 25 - I have tried to call you several times about this issue. I have since spoken to the EnergyCo employee involved.

Regards,
Emma

From: Ash Albury
Subject:
Date: 15 March 2024 at 1:11:51 PM AEDT
To: Emma Bowman
Cc: James Hay

Hi Emma,

Further to my previous email, you can find information in response to your question about flooding impacts at Merotherie Road addressed in the Response to Submissions report, which has now been published. You can view it at <https://www.planningportal.nsw.gov.au/major-projects/projects/central-west-orana-rez-transmission>. The Response to Submission report has addressed potential flood impacts, including at Merotherie Road (see Sections 4.16.5, 4.18.5, 5.13.16 and 5.25.8) and in a further report at Appendix K.

Regards
Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

Executive Coordinator: Bernadette Pirihi

-----Original Message-----

From: Emma Bowman
Sent: Monday, 20 May 2024 8:43 AM
To: Ash Albury
Cc: James Hay ; Tim Lang
Subject: Workers Accommodation

Good morning Ash,

I have heard whispers from developers that they are being told to continue making provisions for temporary workers' accommodation in each project within the CWO REZ. Can you please update me on

what is happening re “the whole of REZ workers’ accommodation strategy”?

Regards,
Emma

From: Ash Albury
Subject: RE: Workers Accommodation
Date: 21 May 2024 at 5:16:01 AM AEST
To: Emma Bowman
Cc: James Hay , Tim Lang

Emma,

G'day and thanks for your email. The NSW Department of Planning, Housing and Infrastructure (DPHI) require individual projects to provide sufficient workers’ accommodation that minimises long-term housing, tourist, and visitor accommodation impacts.

Central-West Orana REZ developers are required to develop workforce accommodation management plans and obtain their own planning approvals that consider demands on housing and other social services. These management plans also ensure accommodation utilities (including water, wastewater, waste, and electricity) are designed and located in accordance with council specifications and relevant standards.

EnergyCo is working across project partners, local councils, developers, government agencies and other parties to ensure these items are addressed.

The NSW Government is concurrently investigating whether additional measures are required to help mitigate cumulative impacts. DPHI is considering how these impacts and mitigations will form part of a housing strategy, which is expected to be finalised in late-2024.

I hope this answers your question.

Thanks
Ash

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

Executive Coordinator: Bernadette Pirihi

The Energy Corporation of NSW (EnergyCo) is part of the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

-----Original Message-----

From: Emma Bowman
Sent: Thursday, 30 May 2024 1:50 PM
To: Ash Albury <ashley.albury@dpie.nsw.gov.au>
Cc: James Hay ; Tim Lang
Subject: CWO REZ matters

Ash,

I'm disappointed that I haven't had a return phone call since attempting to contact you on Monday regarding a follow up of what we discussed last Friday about mental health support for specific landowners severely affected by the CWO REZ transmission project. I was sure I impressed upon you the urgency this matter needs to be dealt with so I would appreciate some answers immediately.

I also wanted to raise, AGAIN, the issue of tax implications for transmission affected landowners. As expected, landowners are being told the compensation payments will be taxed as income meaning a large proportion will lose 48% of aforementioned payments to the ATO. I have been raising this issue with EnergyCo since January 2024 (and I'm sure it has been raised previously in information sessions by individuals) - where are the answers and strategies to stop affected landowners losing nearly half of their "compensation"? This is NOT ACCEPTABLE!

I will not be holding my breath for any tangible change from EnergyCo seeing as the smallest act of good faith to the community, the change in name of the Merotherie Energy Hub, has yet to be made. You know all too well the Dunedoo district has been calling for that for an extended length of time!

Emma

From: Ash Albury
Subject: RE: CWO REZ matters
Date: 31 May 2024 at 3:34:03 PM AEST
To: Emma Bowman
Cc: James Hay , Tim Lang

Emma,

My apologies for missing your call on Monday.

To address your concerns, we understand the property acquisition process can be emotional and stressful. EnergyCo takes the wellbeing and mental health of landowners and affected parties seriously. EnergyCo is investigating ways to continually improve the support provided to the Central-West Orana REZ community. We are working to announce enhancements to existing mental health services in the near future. We are in the meantime working with land owners on a case by case basis.

I understand and sympathise with the concerns land owners have in regards to tax treatments. However the tax treatment of any income is an Australian Government matter and should be referred to the Australian Taxation Office. Recipients of landowner payments should discuss their personal tax arrangements with a tax advisor or accountant as everyone's personal tax circumstances differ. EnergyCo will continue to advocate for a way forward regarding taxation on landowner payments.

Regarding the naming of the Merotherie Energy Hub, the name was originally used as this was the locality of the Hub. EnergyCo has committed to reviewing the name of the Energyhub with a view to

changing it. In order to do this we are going to undertake community consultation and are hoping to undertake this in the second half of this year.

Thanks

Ash Albury
Executive Director
Planning and Communities
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

Executive Coordinator: Bernadette Pirihi

The Energy Corporation of NSW (EnergyCo) is part of the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

From: Emma Bowman
Subject: Re: CWO REZ matters
Date: 31 May 2024 at 4:19:23 PM AEST
To: Ash Albury <ashley.albury@dpie.nsw.gov.au>
Cc: James Hay Tim Lang

Ash,

As you well know I also tried to call you yesterday and twice this afternoon.

You have not addressed my concerns about the wellbeing and mental health of landowners and affected parties in the slightest! When we spoke last week, regarding one family in particular, you assured me you would do your utmost to get them some help DIRECTLY. I understand there are processes in place but as we discussed the wellbeing of these people is the highest priority. I have previously informed you that if anything were to happen to any of the transmission affected landowners I will hold you, the broader EnergyCo staff and the Department, personally responsible. The irreparable damage EnergyCo has done in this district is disgraceful, you should all be ashamed of yourselves and disgusted that you are willing to work for an organisation with such a disastrous, and completely warranted, reputation. Speaking to affected landowners in the Hunter and New England regions completely justifies the experiences and feelings of CWO REZ community members toward EnergyCo - the way affected landowners and community members are treated has not changed in the slightest!

I know one landowner who recently paid \$1300 to their accountant to get a ruling on the tax implications of the compensation payment. It is obvious that registered tax accountants are not familiar with these sorts of payments and are therefore struggling to give accurate and timely advice. Maybe EnergyCo needs to double the compensation payments so landowners get an appropriate payment for the upheaval the CWO REZ transmission project has placed on their lives and businesses?!?

I have been told numerous times, once by you at a meeting in Dugald Saunders' office, that changing the name of the Merotherie Hub would be an easy fix and something that could be done quickly. What changed?

Emma

EnCo 09.

From: Emma Bowman
Subject: Draft Headroom Assessment CWO REZ
Date: 14 August 2024 at 9:30:23 PM AEST
To: Ash Albury
Cc: James Hay

Hi Ash,

Why isn't the following the sort of information that EnergyCo sends in its fortnightly update or advertises for community comment?

Why do we have to go looking or happen upon it to have a chance to comment?

<https://www.energyco.nsw.gov.au/news/notification-draft-headroom-assessment-central-west-orana-rez-access-scheme>

Emma

From: Emma Bowman
Sent: Tuesday, August 20, 2024 8:18 AM
To: Tim Lang
Subject: Fwd: Draft Headroom Assessment CWO REZ

Dear Tim,

Please see below forwarded email. I have not had a response from Ash or James.

I was under the impression EnergyCo was working to be more transparent with the affected communities, yet we are still being kept in the dark when it comes to project updates such as the Draft Headroom Assessment.

Regards,
Emma Bowman

On 21 Aug 2024, at 4:40 PM, Tim Lang

wrote:

OFFICIAL

Hi Emma,

Thank you for your email.

I'm on leave tomorrow and Friday but will follow up with EnergyCo next week.

Kind regards,

Tim Lang (*he/him*)

Advisor – Energy

Office of the Hon Penny Sharpe MLC

From: Emma Bowman

Sent: Tuesday, August 27, 2024 9:08 PM

To: Tim Lang

Subject: Re: Draft Headroom Assessment CWO REZ

Hi Tim,

Any update on the below?

Submissions on the Draft Headroom Assessment are due on Thursday (29th).

Regards,

Emma

On 28 Aug 2024, at 9:12 am, Tim Lang

wrote:

OFFICIAL

Hi Emma,

I believe EnergyCo are planning to extend the consultation.

Please wait for confirmation from them - they should be in touch today.

Kind regards,

Tim Lang (*he/him*)

Advisor – Energy

Office of the Hon Penny Sharpe MLC

From: Emma Bowman

Sent: Wednesday, August 28, 2024 9:43:31 AM

To: Tim Lang

Subject: Re: Draft Headroom Assessment CWO REZ

Hi Tim,

Whilst an extension to the submission deadline will be welcome it does not address the lack of information, or explanation of the process/terminology, available to members of the community regarding the Headroom Assessment.

Will EnergyCo be required to provide further information to the community prior to the consultation period ending?

Regards,
Emma
Sent from my iPhone

On 28 Aug 2024, at 8:26 PM, Tim Lang

wrote:

OFFICIAL

Hi Emma,

Apologies - very busy today.

Will follow up with EnergyCo on that.

Best,
Tim

From: Emma Bowman
Sent: Monday, September 2, 2024 12:40 PM
To: Tim Lang
Subject: Re: Draft Headroom Assessment CWO REZ

Hi Tim,

EnergyCo did confirm there would be an extension of a week to the consultation - now closing this Thursday (5th).

We, as community members, have still been given no extra information on the Draft Headroom Assessment by EnergyCo.

Surely closing consultation without giving the impacted residents a chance to learn about what is going on isn't very good community engagement?

Regards,
Emma

On 2 Sep 2024, at 1:29 pm, Tim Lang

wrote:

OFFICIAL

Hi Emma,

I've flagged with EnergyCo but specific comms will be their operational call.

Will raise how we notify of consultations going forward too.

Just a heads up that the assessment will not change the actual infrastructure – it's a technical assessment modelling what is already planned.

Regards,

Tim

Tim Lang (*he/him*)

Advisor – Energy

Office of the Hon Penny Sharpe MLC

From: Emma Bowman

Sent: Monday, September 2, 2024 1:37 PM

To: Tim Lang

Subject: Re: Draft Headroom Assessment CWO REZ

Hi Tim,

Thanks for getting back to me.

I understand that operations will be EnergyCo's call however how do we make changes to the way they are consulting the community? The lack of transparency is an issue we have been flagging since EnergyCo arrived in our area.

I think it's really important that community member are notified of all consultations irrespective of if it has an impact on the ground.

I understand the draft Headroom Assessment will not change infrastructure but it would be nice to have this explained to community members. It's difficult to keep up when the language changes without explanation.

Regards,

Emma

Sent from my iPhone

On 2 Sep 2024, at 3:02 PM, Tim Lang

wrote:

OFFICIAL

Thanks Emma,

I will raise this broader issue with EnergyCo.

I think that culture change is happening but can see that in this case it's a bit of a missed opportunity to get information out.

Will speak to them about the possibility of an explainer.

Regards,

Tim

EnCo 10.

From: Macayla Smith
Subject: Thank you for your interest in the Coolah community workshop
Date: 5 February 2024 at 12:03:52 PM AEDT
To:

Good afternoon Emma,

Thank you for your interest in the Coolah community workshop.

We have received feedback that the workshops were not the right approach for community consultation. We also received a high level of interest for the workshops that would not allow the workshops to function as designed. As a result, the community workshops will not be going ahead as planned.

Our client is now redesigning and expanding the workshops to be community drop-in sessions to allow as many community members to attend as possible at times of their choosing to accommodate the level of interest received and reflect community wishes.

Thank you again for taking the time to register your interest. We apologise for any inconvenience caused by the change in approach.

Kind regards,



Macayla Smith

RECRUITMENT
COORDINATOR

Taverner Research Group

W www.taverner.com.au

From: Macayla Smith
Subject: FW: Community and Employment Benefit Program community engagement
Date: 21 February 2024 at 9:47:36 AM AEDT
To: Undisclosed recipients;;

Good morning,

We are emailing you to provide an update on the community drop-in sessions to be hosted as part of EnergyCo's community consultation for the **Community and Employment Benefit Program** (the

Program). As per previous correspondence, these drop-in sessions are replacing the community workshops that you registered your interest in attending.

Community drop-in session schedule

Drop-in sessions will be held across the Central-West Orana Renewable Energy Zone (REZ) at the end of February to enable more community members to attend. During these sessions, you will be able to learn more about the Program, ask questions and provide feedback about the type of benefits you would like to see delivered in the Central-West Orana REZ

The session format has been redesigned to be flexible and to enable participants able to arrive and talk with the Program team at a time that suits them. The drop-in sessions will be open to everyone in the Central-West Orana REZ community, with the schedule and more information about the Program (including a recorded online briefing and Q&A session) available on the EnergyCo [website](#).

Online survey

An [online survey](#) is also available for you to have your say on the types of benefits that should be delivered in the Central-West Orana community. Feedback provided through the survey will help the NSW Government refine the Program so that it reflects the priorities of the Central-West Orana region.

The survey is live and is available for completion until 11:59pm on Sunday 10 March 2024.

For more information about the Central-West Orana REZ, you can visit energyco.nsw.gov.au/cwo or contact the project team at cwo@energyco.nsw.gov.au or by calling 1800 032 101.



Macayla Smith

RECRUITMENT

COORDINATOR

Taverner Research Group

T

E

W

www.taverner.com.au

EnCo 11.

From: Emma Bowman

Subject: CWO REZ

Date: 7 February 2024 at 8:46:41 PM AEDT

To:

Dear Tom,

Please find attached emails with some questions I have previously posed to EnergyCo staff. These are additional to all of the questions I have asked at drop in sessions and meetings.

As a community we have been asking for the energy hub near Birriwa to have its name changed and despite assurances that would happen we are yet to see it happen. Merotherie is a property name and having EnergyCo use that name without permission has been a challenge for the family who own

Merotherie.

What has happened about the whole of REZ accommodation strategy I spoke to Mike about last year? A lot of things about the CWO REZ, and EnergyCo's management, are happening behind schedule. More thought needs to go into how things will happen before they are rolled out!

The concerns we have in this district have been conveyed to EnergyCo staff for a long time and like I said to you today it has been like talking to a brick wall. The cumulative impacts of the CWO REZ have the potential to devastate our district!

Attached is also my submission to the CWO REZ transmission project and my speech from the Hills of Gold IPCn meeting last week.

Regards,
Emma

From: Emma Bowman
Sent: Friday, February 9, 2024 12:02:29 PM
To: Thomas Watt
Subject: CWO REZ

Hi Tom,

Please find attached report from the Re-Alliance Community Benefits Consultation meeting on 17th February 2023 in Dubbo which I understand you attended in person. We are yet to see answers to the questions posed on the last page or any action from suggestions in the outcomes report. This should have been used to form the guidelines for the Community and Employment Benefit Program, not wasting community members time at more workshops. If EnergyCo had adequately consulted with the communities in the Warrumbungle Shire Council the Community Action Plans would've formed another part of the program guidelines without wasting more time! Like you were told in Dunedoo on Wednesday afternoon our communities are full of volunteer organisations; we don't have the resources bigger centres like Dubbo and Mudgee do, so how is it fair to expect our communities compete with them in applying for funding?

Like I have told you previously, EnergyCo haven't listened to community concerns to this point, and this is why we have ended up here. The CWO REZ is a very badly organised, and badly executed government project. All proposals and works in the CWO REZ, and others, should be paused until the big issues - transmission route finalisation, transport route and road upgrades, water use, worker accommodation, just to name a few - are rectified to the satisfaction of the communities that will be affected, not the "experts" who deem the impacts acceptable! Whilst not all proposed projects within the REZ boundary will connect to the EnergyCo transmission lines, cumulative impacts from all projects need to be considered!

These issues are not unique to the CWO REZ but it seems all projects EnergyCo are involved in.

Attached is also a news article regarding tax implications of compensation. This needs to be sorted out NOW!!

Regards,
Emma

From: Thomas Watt
Subject: Re: CWO REZ
Date: 12 February 2024 at 4:44:11 PM AEDT
To: Emma Bowman
Cc: Ryan Skinner, Julia Jelbart, Peter Thrift

Hi Emma,

Thanks for your email on Wednesday and Friday last week. We have started to review and check what has been provided before and what needs a further answer. I'll provide a response this week, or if we need to get info from others at EnergyCo then I'll let you know.

Regards

Thomas Watt

EnCo 12.

-----Original Message-----

From: Emma Bowman
Sent: Sunday, 21 January 2024 9:20 AM
To: Marcus McClintock
Subject: Tax Implications of Compensation

Hi Marcus,

Thank you for your time on the phone on Friday.

I am keen to speak more about the tax implications of the compensation for the CWO REZ transmission project affected landowners. I understand the fine details will differ from business to business but there must be rules and regulations around the compensation payouts for accountants to follow. I would also like to know the difference between a voluntary agreement and a forced sale (compulsory acquisition).

I would be available to meet with you in Dunedoo on Wednesday (24th) afternoon if that would suit you?

Kind regards,
Emma Bowman

On 22 Jan 2024, at 4:40 pm, Marcus McClintock wrote:

Hi Emma,

Thank you for your email and call last week. As mentioned, I will be in the region Tuesday and Wednesday. However, I have a commitment in Dubbo Wednesday afternoon. If it suits your schedule, I'll be in the office there from 1.00p to 3.30p and would be happy to meet.

Alternatively, if it's more convenient for you, I can also meet in Dunedoo but it would need to be Wednesday morning. Please let me know your availability and what works best for you?
Kind regards

Marcus McClintock
Director, Land and Property
Energy Corporation of NSW (EnergyCo)

E [W energyco.nsw.gov.au](mailto:W@energyco.nsw.gov.au)

From: Emma Bowman
Sent: Tuesday, January 23, 2024 11:20:41 AM
To: Marcus McClintock
Subject: Re: Tax Implications of Compensation

Hi Marcus,

Would 10.30 in Dunedoo suit you?

Thanks,
Emma
Sent from my iPhone

On 23 Jan 2024, at 5:28 pm, Marcus McClintock > wrote:

That works for me, please provide your address and I look forward to meeting you then.
Regards
Marcus

From: Emma Bowman
Sent: Friday, February 2, 2024 8:10:38 PM
To: Marcus McClintock
Subject: Re: Tax Implications of Compensation

Hi Marcus,

I am yet to receive an email from you regarding the tax implications of transmission line compensation (both voluntary and compulsory) as we discussed via text message after cancelling our proposed meeting on the 24th January.

If you could provide me with some information that would be appreciated.

Many thanks,
Emma

From: Marcus McClintock
Subject: Re: Tax Implications of Compensation
Date: 2 February 2024 at 8:18:30 PM AEDT
To: Emma Bowman

Hi Emma,

I'm very sorry for my delay in getting back to you. It's been an incredibly busy time but I will endeavour to have a response early next week.

I appreciate your patience in this matter.

Kind regards
Marcus

From: Marcus McClintock
Subject: Capital Gains Tax
Date: 6 February 2024 at 5:22:07 PM AEDT
To: Emma Bowman

Hi Emma,

Thank you for speaking with me a couple of weeks ago and I apologise for the time it has taken me to respond.

In respect to tax implications in particular Capital Gains Tax, available case law confirm that the liability flows from personal situation of the landowner and its particularly influenced by the original date of purchase of the property.

For reference, please find some legal authorities on CGT as follows;

- Groves and Ryde Tyre Services Pty Ltd v RTA NSW (1992)
- Beilharz investments Pty Ltd v Darling Harbour Authority (1986)
- Russell Pty Ltd v RTA of NSW (1992)
- Prince Alfred Park Reserve Trust as Trustee for the Prince Alfred Park v State Rail Authority of NSW (1997)

The above case law indicates CGT liability of the landowner is not a relevant consideration to the assessment of compensation for land acquired.

Notwithstanding the above, the affected landowner may wish to seek their own advice from an appropriately qualified accountant to advise on their individual tax circumstances.

Please do not hesitate to contact me should you wish to discuss.

Kind regards

Marcus McClintock
Director, Land and Property
Energy Corporation of NSW (EnergyCo)

W energyco.nsw.gov.au

EnCo 13.

From: Emma Bowman
Sent: Monday, 6 November 2023 6:23 PM
To: Megan Jones
Subject: Energy hub renaming

Hi Megan,

Thank you for your time in the office on Thursday.

I finally remembered the other thing I was meant to ask you about. Is there any progress on changing the name of the Merotherie Energy Hub?

Kind regards,
Emma

From: Megan Jones
Subject: Re: Energy hub renaming
Date: 13 November 2023 at 9:14:21 PM AEDT
To: Emma Bowman

Hi Emma

Thank you for your email regarding changing the name of the Merotherie Energy Hub to a more location specific name.

This matter has also been raised as part of the Transmission Project EIS process. I have forwarded your correspondence to the project team for consideration.

I will keep you notified of the response and any next steps.

Regards
Megan

Megan Jones
Council and Community Interface Manager, Central-West Orana REZ
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

W energyco.nsw.gov.au

EnCo 14.

From: Bridget Kelleher
Subject: Central-West Orana REZ Queries
Date: 10 November 2023 at 8:46:23 AM AEDT
To: Emma Bowman

Cc: Megan Jones

Hi Emma,

Following on from our conversation last week in the Dubbo Office, please see responses to questions taken on notice.

Workers Camps - how are they broadly being coordinated? Is there a strategy/plan to manage EnCo/CFG/Other projects requiring workers camps?

EnergyCo is carrying out two-way engagement with Candidate Foundation Generators on a range of topics to coordinate activities in the REZ, including workforce accommodation. This includes sharing information between proponents on proposed workforce accommodation facilities.

EnergyCo is not intending to increase the size of the proposed workforce accommodation facilities at Merotherie and Cassilis as outlined in the Environmental Impact Statement. These sites would service the workforce for the REZ transmission project and are not planned to host workforces from other renewable energy projects.

EnergyCo is working with developers and NSW Government agencies to investigate whether co-located facilities may be feasible to help consolidate the total number of workforce accommodation facilities in the REZ. If any potential sites are identified, these would be subject to planning approval and community consultation to ensure potential impacts to the surrounding environment and communities are managed appropriately. EnergyCo will keep the community informed on these investigations and will provide further updates in the coming months.

Simultaneous roll-out of REZ projects - is there a strategy or schedule to develop/implement each project given the impacts on local services, roads etc.

Chapter 20: Cumulative Impacts of the EIS, provides an overview of the cumulative impacts that may occur as a result of the project and the identified relevant future projects during construction and operation. The proposed connection of the projects into the transmission line, will be subject to planning approvals of each project, their construction timeline and if they are awarded access rights. Generation projects are proposed to come online late 2027/early 2028.

Tender 4 "Access rights" AEMO – why has it's been delayed.

AEMO services are responsible for the Access rights to the Central-West Orana REZ, all enquiries related to the tender process and the delay for the first tender please email AEMO services at stakeholderengagement@aemoservices.com.au

Merotherie to Elong transmission line voltage change - was historically mapped as 550kV very early on, then changed to 300kV for 3GW sized REZ, then reverted back to 550kV when REZ size increased to 4.5GW. Was the intended size for the REZ always 4.5GW? Appears suspicious.

From EnergyCo's initial study corridor released in February 2022, the line between Elong Elong-Merotherie-Wollar was expected to be rated at 500 kV. When EnergyCo released this stage 1 corridor it was planned to unlock at least 3GW of new network capacity. <https://www.energyco.nsw.gov.au/sites/default/files/2022-09/cwo-rez-project-overview-feb-2022.pdf>

Please let me know if you require any further information.

Bridget Kelleher

Senior Place Manager, Central-West Orana REZ
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

W [energyco.nsw.gov.au](https://www.energyco.nsw.gov.au)

From: Emma Bowman
Sent: Wednesday, November 15, 2023 2:42 PM
To: Bridget Kelleher
Subject: Re: Central-West Orana REZ Queries

Hi Bridget,

Thank you for your reply.

Just a couple of questions regarding your answers.

Why is EnergyCo only now considering co-located facilities? Should this not have been done earlier to cater for the the whole REZ? I have noticed a fair number of amendments to wind and solar projects to include workers accommodation.

I have attached two pages from the NSW Network Infrastructure Strategy, May 2023, that clearly show the lines from Merotherie to Elong Elong as 330kV lines in the “deliver now” stage. Can you please explain why these have always been 500kV lines in the current plans?

Regards,
Emma

1.2.1 Central-West Orana REZ

Central-West Orana is one of two REZs with large generation potential and good access both to quality renewable resources and to the existing electricity network. It was formally declared on 5 November 2021, with an intended network capacity of 3 GW.⁸ However, the Consumer Trustee's modelling for this Strategy suggests that significantly more network capacity will be needed than intended in that original REZ declaration.

To meet the declared, modelled and potential long-term needs of the CWO REZ, the Strategy proposes the network arrangements laid out in Figure 7.

- Deliver Now.** 4.5 GW capacity by 2027/2028, delivered by new 500 kV lines connecting a new hub at Merotherie to the existing network at Wollar, with 330 kV extensions to Elong Elong, Ungula and Uarabry West and East, and a possible expansion to Unungla.

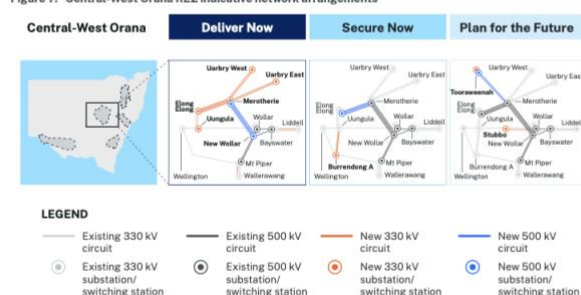
- Secure Now.** An additional 2.3 GW capacity by 2038, delivered by upgrading the Merotherie–Elong Elong lines to 500 kV, with an extension to Burrendong and upgrade in the Mt Piper area (off-map).

- Plan for the Future.** An additional 3.5 GW capacity if needed, delivered by utilising the Merotherie–Elong Elong line to its full capacity, with extensions to the Gilgandra–Tooraweenah area and Stubbos.

The options proposed would deliver the needed capacity while reducing the number and duration of interruptions to local communities, offering flexibility if new capacity in a REZ is needed sooner than anticipated, and allow for greater competition for access rights through LTESA tenders, bringing delivery and cost benefits to NSW electricity consumers.

The high-level detail and rationale for each of the Network Infrastructure Options are set out below, along with their development status and next steps. Further detail is given in Appendix B.

Figure 7: Central-West Orana REZ indicative network arrangements



Estimates are Class 5b accuracy (i.e. +/- 50%) and for development and construction costs only (excluding finance, generator connection and system strength costs). This provides a comparable basis with estimates for projects under the National Electricity Rules. The total cost for a REZ also includes finance, generator connection and system strength costs at typically an additional 70% to 110% of development and construction costs. Generator and storage proponents that hold access rights will contribute connection and system strength costs. All values are in real 2021 Australian dollars.

Deliver Now network configuration is subject to review and refinement as part of detailed design review, Network Operator tender and the authorisation process.

CWO REZ Deliver Now

All modelled scenarios indicate that at least 4 GW network capacity would be needed as early as possible and no later than 2033: see Figure 8 point A.

To meet these requirements, EnergyCo proposes Option 1A, a new transmission spine for the CWO REZ that would add 4.5 GW capacity, delivered by 2027/2028. This option is comprised of:

- two 500 kV double circuits between Wollar and Merotherie, and
 - new 330 kV lines to new energy hubs at Elong Elong, Uarabry East and Uarabry West
- Subject to further analysis, CWO REZ may be meshed with Line 79 at Ungula to increase transfer capacity and deliver additional system benefits. Further augmentations to CWO REZ may be revised.

Option 1A replaces Options 1 and 2A from the Draft Strategy, which together delivered only 4 GW. The new Option 1A efficiently delivers additional capacity due to an additional 1,500 MVA transformer that has been added at Elong Elong. The Uarabry East and Uarabry West hubs replace the single Uarabry hub in the Draft Strategy, reflecting constraints identified by local communities and practicalities in adding future capacity, and noting that these two extensions are dependent on access right holders. Further refinements to the CWO REZ scope may occur before EnergyCo, as Infrastructure Planner, makes a recommendation to the Consumer Trustee for authorisation.

Option 1A adds capacity at a cost comparable to the previous Options 1 and 2A from the Draft Strategy and Draft 2023 IIO Report. The resulting overall cost estimate of \$3.2 billion is within the +/-50% accuracy band. It also better enables future expansions without repeated community and landholder impacts (final Access Fee arrangements will determine how costs related to the two Uarabry hubs may be recovered from energy suppliers).

Note that the previous CWO REZ cost estimates were published by AEMO about 4 years ago as part of the 2020 ISP process. These are now out of date. The underlying project and, as a result, costs have changed for three key reasons. Firstly, EnergyCo had to add an additional double circuit to meet the 'N-1 secure' operating requirement. Secondly, EnergyCo had to move the originally planned transmission corridor to avoid negative impacts on the Merriwa–Cassilis communities and prime agricultural land. And thirdly, EnergyCo increased the overall project size to deliver sufficient hosting capacity pre-2030, create optionality beyond 2030 and share community impacts more evenly between CWO and NE REZ.

To enable CWO REZ to export more than 3 GW to the key demand centre, Stage 1 of the Hunter Transmission Project (HTP) will also have to be in place: see section 1.3 below.

CWO REZ Secure Now

The modelling indicates that at least another 1.5 GW of additional network capacity may be needed after 2033, if there is either transmission delay or early coal exits: see Figure 8 point B.

To achieve this and support LDS projects that would deliver broader consumer/network benefits, EnergyCo proposes three options to add 2.3 GW of network capacity at low cost.

- Option 2B would upgrade the 330kV lines between the Elong Elong and Merotherie hubs to 500kV, adding 1.5 GW of network capacity and optionality to cater for early coal closures and other uncertainties. Although this option could unlock 3 GW of network capacity, it will be limited to 1.5 GW until a further augmentation is made to the downstream shared network.
- Option 5A would expand the network south from Ungula towards Burrendong to add 0.8 GW network capacity and support up to 500 MW of LDS projects.
- Option: Pumped Hydro Near Bathurst would reinforce the existing line between Bathurst and Mt Piper, supporting up to 325 MW of additional LDS capacity, delivering network security and reliability benefits in the CWO REZ.

As Infrastructure Planner, EnergyCo may consider these Secure Now options, and their potential inclusion as Deliver Now, as part of the scope for network projects recommended to the Consumer Trustee for authorisation, subject to community, cost and environmental considerations.

CWO REZ Plan for the Future

Modelling of the Coal Exit by 2030 and Strong Electrification scenario suggests that the CWO REZ may require an increase up to a total 9 GW capacity by 2043 if there is also strong demand from electrification: see Figure 8 point C.

To achieve this if needed, EnergyCo proposes the following options to augment the capacity provided under earlier options:

- actualising the latent 1.5 GW of capacity delivered under Option 2B, with further augmentation downstream in the existing network
- Option 3A, a 500 kV expansion from Merotherie to a new hub in the Gilgandra–Tooraweenah area and adding 1 GW capacity, and
- Option 4, a 330 kV expansion from Wollar to a new hub at Stubbos also adding 1 GW capacity.

If any of these options were implemented to take the CWO REZ network capacity beyond 6 GW, new augmentations downstream in the existing shared network would be required.

From: Bridget Kelleher
Subject: RE: Central-West Orana REZ Queries
Date: 17 November 2023 at 3:57:21 PM AEDT

To: Emma Bowman

Hi Emma,

Following on from your questions:

I acknowledge your comments the accommodation coordination planning has not occurred earlier.

The deliver now scope in the 2023 NIS is intended to describe the expected network infrastructure required to support a 4.5GW transfer capacity within Central-West Orana REZ, and the 4.5GW transfer capacity can be achieved by locating all four of the 330/500kV power transformers at Merotherie and transferring power via the 500kV lines from Merotherie energy hub to Wollar where it connects to the Transgrid network and the National Electricity Market.

This means for deliver now, the Merotherie power transformers are receiving all of the stage 1 generation at 330kV and stepping it up to 500kV for transfer to Wollar and the NEM. It is notable that it is the four Merotherie power transformers that limit the transfer capacity to 4.5GW within the Central-West Orana REZ and adding additional power transformers at Merotherie may be impractical due to engineering reasons.

To increase the Central-West Orana REZ transfer capacity beyond 4.5GW (for example to 6GW), additional power transformers will be required, and Elong Elong may be the best location to add them leveraging of the deliver now infrastructure at Elong Elong.

There is some uncertainty as to the timing for when the additional capacity to 6GW will be required, so EnergyCo has identified this in the secure now planning of the NIS and also included 500kV in the stage 1 EIS.

In addition to avoid future impacts on the community the lines from Merotherie to Elong Elong will be constructed to a 500kV rating, and initially operated at 330kV.

This approach will avoid new construction or rework of the lines along the line corridor between Merotherie and Elong Elong in the future should an increase to 6GW be required.

Have a nice weekend.

Bridget Kelleher

Senior Place Manager, Central-West Orana REZ

Energy Corporation of NSW (EnergyCo)

Office of Energy and Climate Change

EnCo 15.

-----Original Message-----

From: Emma Bowman <tinmanfarming@outlook.com>

Sent: Saturday, 4 November 2023 12:23 PM

To: Bridget Kelleher

Subject: Questions raised at NSWFA/EnergyCo briefing

Hi Bridget,

Thanks for your time on Thursday morning at the Dubbo office. I have finally had time to read through the questions raised at the NSWFA/EnergyCo briefing and have found the question that I asked Cleo to add to the list is missing.

I would like to know what the plan is for the construction compound and accommodation areas once construction is complete (ie. the site at Neeley's Lane, Cassilis, and the area of land at the Birriwa Energy Hub that is not taken up by permanent infrastructure)?

Many thanks,
Emma

On 6 Nov 2023, at 4:52 pm, Bridget Kelleher

wrote:

Hi Emma,
Thank you for your email. I have spoken to Cleo and she apologies this wasn't included.
Leave this one with me and I will come back to you.

Bridget Kelleher
Senior Place Manager, Central-West Orana REZ Energy Corporation of NSW (EnergyCo) Office of Energy and Climate Change

W energyco.nsw.gov.au

-----Original Message-----

From: Emma Bowman
Sent: Monday, 6 November 2023 4:58 PM
To: Bridget Kelleher
Subject: Re: Questions raised at NSWFA/EnergyCo briefing

Thanks Bridget.

Sent from my iPhone

From: Bridget Kelleher
Subject: RE: Questions raised at NSWFA/EnergyCo briefing
Date: 7 November 2023 at 4:46:07 PM AEDT
To: Emma Bowman

Hi Emma,

In response to your question:

The EIS outlines the demobilisation and construction site rehabilitation phase, which would include:

- removal of all construction plant and equipment, and all materials not required during operation, including any remaining waste material
- removal and/or handover of construction compounds and workforce accommodation camp sites to EnergyCo
- removal of any temporary site buildings and temporary environmental controls
- rehabilitation works, including rehabilitation of construction areas, compounds and workforce

accommodation camps, irrigation and water infrastructure facilities, natural drainage in areas where temporary facilities were provided, fences, gates and other agricultural infrastructure which may have been damaged during construction.

The workforce accommodation camps are expected to operate for the duration of construction. At the end of construction, the workforce accommodation camps would be demobilised, and the sites would be cleared of any temporary infrastructure and equipment and rehabilitated.

The use of this land once rehabilitated, will be considered by EnergyCo at that time.

Bridget Kelleher
Senior Place Manager, Central-West Orana REZ
Energy Corporation of NSW (EnergyCo)
Office of Energy and Climate Change

W energyco.nsw.gov.au

EnCo 16.

From: Emma Bowman
Sent: Wednesday, August 30, 2023 3:47 PM
To: EC Central-West Orana Renewable Energy Zone Mailbox
Subject: Increase in CWO REZ capacity

To whom it may concern,

I object very strongly to the proposed increase in network capacity for the Central West Orana Renewable Energy Zone.

The concentration of renewable projects proposed for the Dunedoo district is ridiculous and not sustainable. The possibility of having 5000 workers in this region at peak construction will cripple our already suffering services. There are so many unanswered questions; where the workers will be housed, where their water will come from, what impact will it have on our medical and emergency services, just to name a few. The central west is only a few years out of the one of the worst droughts in history and we're heading into another forecast El Niño, water is scarce for livestock in dry times so shouldn't be wasted on construction. The proposed workers camp we have been made aware of near the Merotherie hub is situated amongst a number of farm houses, some of which are home to young families who often have only a woman and children occupying them during the week; how safe will they feel with over a thousand workers in close proximity? Our medical services are poor at best, waits for GP appointments and emergency medicine are long and often means long distances are travelled to receive care if urgent; what will the huge influx in population do to those wait times?

In 2017 the Dunedoo/Coolah/Cassilis area had one of the largest bushfires we've ever seen. There were countless homes and livelihoods saved by aerial water bombers. The RFS would be mad to send helicopters or planes into an area with transmission lines or wind turbines to assist fire fighting efforts. Not to mention ground crews making their way through solar installations! This will leave a lot of our area unprotected.

Finding farm labour is already difficult. How will we find shearers, shed hands, farm hands or any casual

labourers if everyone is encouraged to upskill and take a job constructing solar panels, wind turbines and transmission lines?

Our property is split by the Golden Highway so we often cross sheep and cattle across the road. The last 10 years has seen a large increase in traffic making these crossings more difficult and dangerous. The increase in traffic flow due to solar and wind projects and transmission line construction, including OSOM vehicles, will dramatically increase our risk during stock crossing. Only two weeks ago we had a near miss with a council ute not taking note of our signs and having to swerve to the other side of the highway to miss our cattle; had there been a person on the road it would have been fatal.

The Warrumbungle Shire Council road network, and probably most around the state, is in disrepair following two above average rainfall years. They cannot handle the traffic that is already using them let alone a massive increase, including OSOM. There is a lot of freight already using these roads that will be severely impacted with time delays and the wear and tear on the already average road surfaces.

The stress the CWO REZ, and from all reports all the other REZ's and transmission line projects around the country, is putting on farmers is unnecessary and cruel. The time a lot of us are spending at meetings, researching projects and writing submissions (like this one!) is unpaid, unlike all the EnergyCo and proponent employees we see at information sessions and meetings! If the government was putting Australia first, instead of playing political games and making promises to the rest of the world regarding net zero, they would be looking into alternative sources of power and other options with the sources we already have. Australia has the cleanest coal in the world, but because it is worth too much money as an export we can't burn it. I imagine if there were more incentives for investment in and conditions around new buildings there would be a lot more solar power generated on rooves in major cities, negating the need for transmission lines; doesn't it make more sense to generate the power where its used! Solar and wind power is not "renewable" or "green" (most of the components aren't recyclable, and think of the diesel burnt in transport and preparing sites and the amount of concrete and steel used), and it is not efficient, hence the need to cover so much viable agricultural land with these monstrosities! If these projects all go ahead I foresee the possibility of our lights being on in Australia but us having nothing to eat!

Regards,
Emma Bowman

From: Kristen Lucas
Subject: Re: Increase in CWO REZ capacity
Date: 30 August 2023 at 3:55:22 PM AEST
To: Emma Bowman

Good afternoon Emma

Thank you for contacting us with your detailed submission about EnergyCo's proposed amendment to the Central-West Orana REZ declaration. We appreciate you taking time to consider the proposal and provide comments.

All feedback will be considered in finalising the proposal and we will keep the community informed once the outcome is confirmed.

Kind regards

Kristen Lucas

Community & Stakeholder Officer, Central-West Orana REZ

Energy Corporation of NSW

P 1800 032 101 (9am-5pm, Monday to Friday) | **E** cwo@energyco.nsw.gov.au

W energyco.nsw.gov.au

ACEREZ – Acciona, Cobra & Endeavour Energy

Overview

“ACEREZ, a partnership of Acciona, Cobra and Endeavour Energy, has been appointed preferred network operator by EnergyCo to design, build, finance, operate and maintain the Central-West Orana REZ transmission network.”

ACEREZ comprises three entities:

- **Network Operator (NO)** which will fund and operate the transmission network infrastructure for 35 years
- **Design and Construct (D&C)** a joint venture between ACCIONA and COBRA to design and build the transmission network infrastructure
- **Maintenance and Lifecycle (M&L)** which will maintain the transmission network throughout the infrastructure lifecycle

According to a NSW Government media release from 25th September 2024 “ACEREZ Partnership (ACEREZ) was granted a transmission operator’s licence for the Central-West Orana REZ transmission system.” “Minister for Energy Penny Sharpe granted the licence, which will enable ACEREZ to design, construct, own and operate the Central-West Orana REZ transmission system, which will connect renewable energy projects within the REZ to the existing Newcastle, Sydney and Wollongong load centres.”

Community Consultation

On the 21st December 2023 EnergyCo uploaded a video to YouTube titled “renewable energy zone deed signing with ACEREZ”. Trevor Armstrong, CEO of ACEREZ, said “ACEREZ is absolutely committed to consulting the community as we work to deliver the project and its very very important to us.” Mr Armstrong also said “we want to make the community part of us because we’re going to be there for 35 years and for us the community is really like our neighbour, and we want to treat them exactly like how you treat your neighbour.”

The ACEREZ website, which has, to my knowledge, only been live since the beginning of 2025, despite ACEREZ employees being in the region, conducting presentations of the industry forums and meeting with CWO REZ transmission affected landowners since at least September, states: “ACEREZ is committed to establishing genuine relationships with the community and stakeholders, underpinned by the belief that open, early and effective communication is key to the success of the Central-West Orana REZ transmission project.”



ACEREZ is strongly committed to supporting the communities in which we work. We will consult with the community in early 2025 to develop a program of initiatives that leave a legacy for current and future generations.

What does ACEREZ consider “early” consultation? I have been informed several times that ACEREZ cannot take over community engagement commitments for the CWO REZ transmission project until financial close has been reached with EnergyCo, which I was originally told would be in November 2024 then quarter one 2025, but, to my knowledge, has not yet been formally declared. Is it acceptable that

while ACEREZ is busy with all facets of project design and undertaking early works community is being left in the dark? Does it sound like a familiar process for REZ impacted communities?

My first official encounter with ACEREZ staff was at the Industry Forum in Dunedoo hosted jointly by ACEREZ and EnergyCo on the 6th August 2024. That forum was designed to educate local businesses about potential opportunities of employment on the CWO REZ transmission project, yet given delay of the forum there were work packages that had already closed for tender and a number that were close to closing. Again, the process has been marred by a lack of adequate planning and delivery and the local, impacted communities are the ones that lose out.

While ACEREZ states their commitment and preference to engage local businesses the Industry Forum made it clear that as the procurement process is overseen by a third party, Industry Capability Network (ICN), there was no way to favour those from the immediate district. Given that larger companies will often be capable of providing services at a cheaper price how many local, small businesses will actually benefit financially from the CWO REZ transmission project construction and operation?

The ACEREZ website states “Our engagement principles”:

Engage continuously:

- Keep key stakeholders and the community informed about the project, its risks and benefits
- Use a variety of communication tools to communicate with the community and stakeholders to ensure they have access to timely information
- Maintain ongoing communication even at times when construction slows or stops

Respectfully engage with Aboriginal and Torres Strait Islander Peoples:

- Be responsive and collaborate with Aboriginal and Torres Strait Islander groups to build understanding and share benefits
- Understand and protect cultural heritage and community values

Monitor our performance:

- Learn from past experience, listen to feedback and regularly review and monitor our approach and be prepared to make changes to meet community needs and expectations

Partner with the community

- Involve the community and get involved – volunteer with the Rural Fire Service/State Emergency Service, employ locals where possible and procure locally to boost local economies
- Ensure any investment in the community is what the community wants

Communicate effectively:

- Talk transparently with community members and stakeholders
- Be available in person to the community
- Be easily contactable via the 1800 number and email
- Provide informative, factual and transparent communication using simple language and in ways the community wants to receive it
- Be inclusive and be sensitive to the community's concerns

Keep our promises:

- Consider our promises and deliver on them
- Provide regular feedback on key deliverables to remain accountable to the community
- Adhere to ACEREZ's values

Be transparent and responsive

- Understand that engagement is a two-way process, be open to alternative views and listen as well as speak
- Explain to stakeholders how their feedback will be used
- Recognise the different communication needs and preferences of stakeholders and endeavour to meet these wherever possible
- Have a representative of the project as the main point of contact for the community throughout the project to provide consistency and be available to meet face-to-face when requested
- Staff community forums and other stakeholder meetings including with members of ACEREZ senior management

When considering the above principles and ACEREZ's belief that “open, early and effective communication is key to the success of the Central-West Orana REZ transmission project” it appears that the community will be engaged, informed, considered and respected, as it should be – what an exciting prospect! Unfortunately, my personal experience, on the ground, has not been favourable nor positive to date. I left the Industry Forum astonished, devastated and most of all, livid; all of my worst nightmares about the CWO REZ transmission project were coming to fruition. The majority of the issues that were raised by community members, especially those directed toward ACEREZ, were news to the incoming team; it was glaringly obvious that the bulk of the potential impacts mentioned by locals during “consultation” with EnergyCo had not been communicated to ACEREZ – had they even made it to the EnergyCo hierarchy? Why had we even bothered?

Following ACEREZ Area Manager, Tim Smith's presentation at the Industry Forum in Dunedoo in early August 2024, and stated willingness to have open and honest discussions with community members, I attempted to contact him to discuss issues that had arisen at the recent forum, yet was unsuccessful. Instead, I found myself caught with the “Community Engagement” team (see email correspondence

[ACERERZ 08.](#)). I stated honestly to ACERERZ Design & Construct Community Engagement Manager, Jodie Barrington, that I would rather not get bogged down with community engagement given my prior experiences, but she promised the world so I let that relationship run its course. To my disappointment, but not surprise, after more than six weeks of toing and froing, the initial promised facilitation of a meeting between myself, another concerned community member and ACERERZ staff was withdrawn “until we have some further clarity on our program and activities”. It was only after an email to the ACERERZ CEO, Trevor Armstrong (see email correspondence [ACERERZ 07.](#)), that a meeting with ACERERZ staff was forthcoming.

I was particularly disappointed to have to call bullsh*t at my first sit down meeting with Tim Smith (email correspondence [ACERERZ 06.](#)). I asked him if, given he is responsible for the ACERERZ property team dealing with transmission affected landowners, he had come across any property access issues that were not foreseen, or at least flagged, by EnergyCo prior to ACERERZ taking over landowner negotiations. His response was a resounding no. I know of a property where a 330kV transmission line is proposed to traverse an inaccessible valley, that in initial planning through a private renewable energy developer had a separate access easement, however, despite the landowners best attempts to warn EnergyCo of future access issues staff were confident the design team would have accounted for such obstacles and ignored his advice. ACERERZ has realised access will be an issue and has, on more than one occasion, suggested to the landowner that their workforce could just ‘pop through’ a gate, drive across the valley ‘along the fenceline’ and ‘pop back in the gate on the other side’. The landowner has refused access on several occasions – but will ACERERZ take it upon themselves to use that route anyway? Or will EnergyCo use the process of compulsory acquisition to acquire an access easement causing the landowner more distress? Since this discussion I have heard there is another property where ACERERZ have found a similar access issue.

The latest consultation issue with ACERERZ has been regarding the proposed upgrades to Merotherie Road. As described in three sets of meeting notes below and email correspondence [ACERERZ 04.](#). It was suggested to me by Jodie Barrington, ACERERZ Community Engagement Manager, during the phone call (notes below) that community had the opportunity to comment on the Merotherie Road upgrades during the EIS exhibition period. What she fails to understand is that there were no designs provided so there was no way for community to understand what would be needed to facilitate the ‘necessary’ upgrades; there are no specifics provided in the EIS, that is left to ‘detailed design’ & ‘further refinement’ leaving no opportunity for community to comment.

How can ACERERZ continue with planning, design and early works without any community consultation? Are CWO REZ transmission affected landowners, and the remainder of the population meant to endure the same unacceptable “community consultation and engagement” for a second time?

At the in person meeting on 15th January 2025 I asked an ACERERZ Place Manager, a designated point of contact for each affected landowner, for an opinion on ACERERZ’s early interactions with landowners. The response I got suggested things were going favourably at this stage. I suggested that the property team should be aware that transmission affected landowners have had a gut full of EnergyCo and believe that regardless of what they suggest or disagree with the project will continue on as planned; the threat of compulsory acquisition is a powerful tool, and the effects of it linger on. While a valid point was raised that if landowners do not speak up themselves the ACERERZ team cannot make changes to accommodate their wishes or address their concerns I would argue that, to date, I have seen nothing from the ACERERZ team to believe any substantial changes will be made unless it is to benefit the project, irrespective of the potential best intentions of some staff members.

Meeting Notes

ACEREZ Phone Call Friday 24th January 2025 at 12.36pm for 22 minutes

- Tim Smith (TS), Jodie Barrington (JB) & Emma Bowman (EB)

Authored by Emma Bowman

- TS said he had received feedback from the design team on Thursday (23rd) morning.
- The design team checked the alternate route for Merotherie Road proposed by David Seis and Emma Bowman at the in person meeting on Wednesday 15th January 2025. The Birriwa Bus Route South route could not be considered as the road is not being considered in the ACEREZ footprint.
- TS explained that the ACEREZ design team response stated that the alternate route proposed would create a reverse curve in the road and therefore a non-compliance issue with the Austroads safety standards meaning the route was unviable.
- EB suggested TS look at the current design of Merotherie Road and the way it curves already. TS responded that safety issues are to do with the angle of the turns etc. and said that ACEREZ are planning to upgrade the bends in the Merotherie Road to make it safer. EB asked if that would require acquiring more land to which TS replied no, all works would be done within the current road corridor. EB questioned the severity of the bend closest to the proposed entry to the workers accommodation facility and how it would be made safe without more land. TS said that corner would have an advised speed limit of 50km/h.
- TS said that the biggest issue with the alternate route would be the OSOM and heavy vehicles. EB suggested that ACEREZ upgrade the section of road between the Golden Highway and the workers accommodation entry, then construct the proposed alternative route, appropriately speed limited, for all ACEREZ and EnergyCo traffic, OSOM and heavy vehicles included, leaving the remainder of the Merotherie Road as is for existing traffic. This would negate the reverse curve issue as the ACEREZ/EnergyCo traffic would not return to Merotherie Road as access would be straight into the Energy Hub. TS stated that construction traffic for the energy hub would not be the only issue, and that the positioning of transmission towers would have to be taken into consideration. EB said she wasn't worried about where the transmission towers went and wondered why that issue wasn't mentioned until the Austroads non-compliance potentially became a non-issue?
- TS explained that the scope of works in the contract for ACEREZ includes the upgrade of the Merotherie Road for the safety of existing road users, and that was the project that was approved hence those works must be carried out. EB suggested there could be an amendment lodged to cover the proposed changes. TS responded that talking about that would be "going into the weeds" so he wouldn't discuss it.
- EB inquired as to the reason why TS did not provide an update on the progress of the assessment of the proposed route on Wednesday (22nd) as agreed in the previous meeting (Wednesday 15th) (documented in the ACEREZ minutes), nor on Friday (24th) morning as promised in a phone call on Thursday (23rd). TS stated that he had been dealing with an HR issue within his team and has struggled with the mental capacity to deal with the Merotherie Road matter. EB suggested TS consider the mental load that dealing with ACEREZ and EnergyCo is having on her. TS said that he believed no excuse would've been adequate for EB. EB stated that an apology would be helpful.
- At that point, approximately three quarters of the way through the phone call duration TS resorted to almost silence, not prepared to discuss the matters we had covered any further.
- EB stated that the community had been left out of the design process for Merotherie Road to date hence the angst. ACEREZ have not been 'on the ground' publicly in the region to date meaning to discuss this issue, or any other, community members have had to seek out ACEREZ. EB suggested again (the same suggestion was made during the previous meeting on the 15th) that the ACEREZ team stop all works, design included until they are able to openly consult the community (it is understood that is not possible until financial close with EnergyCo is reached).

JB said if the suggestion was made at the previous meeting it would be in the minutes and would have been circulated through the chain of command, EB said it was not recorded in the minutes, JB said she would look into it.

- JB made mention that the community had the opportunity to comment on the CWO REZ transmission project during the EIS exhibition, and that the project had been approved regardless. EB responded by stating that the transmission route had changed since the EIS exhibition period and the road upgrade designs were not included in those documents hence the local community had not had a chance to comment. JB stated that she “severely doubted that changes will be made at this stage” when referring to the possibility of an amendment to the project. She also said that there are strict government guidelines that must be adhered to for some aspects of such a project so community input is very little.
- EB explained that ACEREZ CEO, Trevor Armstrong, needed to get on the ground and partake in a meeting to solve the Merotherie Road issue, for a start, as the team members that are currently being engaged are not dealing with the issue to the satisfaction of community members.

ACEREZ In Person Wednesday 15th January 2025 at 9am

- Tim Smith (TS), Tung Pham (TP) – online, Kate O’Shaughnessy (KO), Rebecca Williams (RW) (EnergyCo), Emma Bowman (EB) & David Seis (DS)

Authored by Emma Bowman & David Seis

- PRIOR TO MEETING START TIME: EB received a phone call from KO at 7.40am saying TP had been stuck in traffic and wouldn’t be in Dunedoo by the meeting start time. KO suggested postponing the meeting until 10.30am to allow TP to attend in person or continue with the organised time and have TP join via video, and have TS join in person. Due to prior engagements DS & EB decided to proceed with the meeting as organised.
- DS asked if tenders had been released for the Merotherie Road upgrade and removal of trees. TP’s initial response was no. DS asked TP to repeat his response. Following that DS called bullsh*t – he has been informed by two businesses that they have put in tenders, one for the road upgrade and one for the tree removal. TP explained that the tender process is two-tier, and complicated and advised that we needed stick to the purpose of the meeting. DS & EB attempted

to explain that community should have had adequate consultation prior to the road upgrade designs being 70% complete.

- DS asked why only one local arborist was asked to tender for tree removal. TS's response was that the scope of works was too large for many local businesses.
- TS showed DS & EB the current Merotherie Road design on the laptop.
- DS & EB proposed a 1.5-2km diversion around the high value biodiverse area, through existing government land with a very small negative environmental impact, as per TS sketch. DS questioned if there had been alternatives to the current upgrade design investigated. TS said he had never seen the alternate route DS & EB had provided. TP made it abundantly clear that he did not say the same thing when questioned by DS.
- TS stated that ACEREZ has approval to clear all trees along the Merotherie Road if required for road upgrades.
- DS questioned how ACEREZ/EnergyCo can clear 'high-value biodiversity'. TS explained that the Biodiversity Offset Scheme covers the removal of trees. TS also stated that trees that didn't pose safety issues would be conserved.
- TS advised that the ACEREZ team will conduct an environmental assessment on the road corridor prior to any works being carried out, in essence double checking EnergyCo's assessment, but it is unlikely the report will be available to the public following completion.
- DS & EB both mentioned their concerns about the proposed drainage measures along the flood plain section of Merotherie Road. They are concerned that the current design will not cater for the large volumes of water that will flow through the area during an average flood event. TS mentioned that the modelling they had done informed the design. EB suggested relying on flood modelling alone was foolish given experience with a previous road upgrade.
- DS asked if ACEREZ would be liable for any issues/damage the road upgrade causes to the flood plain and/or Talbragar River System and who would be responsible for any damage that occurred as a result of a flood event eg. road surface being washed into private land, road repairs. TS explained that while ACEREZ is 'in the area' they will be responsible for any repair and clean up works, following that the responsibility will fall to Warrumbungle Shire Council given that part of the road will become their asset.
- EB suggested that it is difficult for the community to have any information or provide feedback when they have not been informed about the current plans eg. what the Merotherie Road upgrade looks like – the designs are not publicly available. KO explained that due to financial close not having been reached between EnergyCo and ACEREZ they cannot technically begin general community consultation - expecting to be 'on the ground' in March 2025.
- EB suggested that all ACEREZ works - design, assessment and physical - should be halted until such a time they can adequately engage with the local communities to gain feedback into the way the project is rolled out.
- EB recounted her effort to contact the Property Acquisition Hotline for mental health support. She was turned away because she was not personally impacted by property acquisition even after being informed by Ash Albury (EnergyCo) and Jodie Barrington (ACEREZ) that all CWO REZ inhabitants would be supported through this avenue. Although the situation has now been rectified EB suggested that it wasn't good enough.
- DS asked that there be investigation into the mental health program that has been discussed for more than twelve months but not finalised and implemented. He stated that he had contact with Ash Albury and was expecting contact with Alex Hall that never eventuated. RW to follow up with EnergyCo.
- When discussing emergency evacuation from the workers camp EB asked TP if he knew who the Rural Fire Service was. TP was unsure so EB explained that the RFS is made up of volunteer landowners who shouldn't be expected to protect the EnergyCo/ACEREZ workers camp and/or project.

- EB asked how ACEREZ could proceed with the plan to house 1200 workers in the camp near Merotherie without adequate emergency procedures having been decided. TP explained that in the early stages of the project they do not need to house that many workers so it wasn't an issue at this stage.
- EB stated that the safety of local landowners and livestock during an emergency should not be impacted by the transmission project. She also questioned if the energy hub was on a suitable site given the access issues and lack of emergency evacuation plan – this has been suggested throughout the whole consultation period with EnergyCo.
- DS asked about the procurement of local service providers for the transmission project. Would small local businesses have any chance of being awarded contracts given the likelihood of large companies having more capacity to provide the quantity of machinery etc.? TS stated that ACEREZ is committed to employing locals and small businesses. DS gave the example of a local business owner who owns one truck with water carting capabilities who has been in contact with ACEREZ about securing a contract for the transmission project but has not yet had confirmation of employment. TS said he was aware of the situation with the aforementioned local and would be contacting him as soon as his services were required. EB asked if contracts would be awarded to larger businesses and small businesses would have to contact them to make arrangements for sub contract opportunities. TS stated that ACEREZ will happily deal directly with small businesses – it does not matter if you have one piece of machinery or 20.
- DS enquired about the livestock agistment agreement on the property where the Energy Hub would be constructed ("Round Camp"). He stated that the original local landowner who had an agreement with EnergyCo/ACEREZ to agist livestock on the property had been asked to have all livestock removed some time prior to Christmas 2024. DS had heard that another local landowner had made arrangements to agist their livestock on the property since that time and was curious as to why the original local landowners agreement had been terminated. TS confirmed that another individual would be agisting livestock on "Round Camp" due to a mutually beneficial arrangement for the aforementioned individual and ACEREZ.
- EB asked TS when she and DS would be updated about their alternate proposal for Merotherie Road. TS stated that he could not give a definitive answer on a response but an agreement was reached that TS would contact DS & EB by the following Wednesday to provide an update if a decision had not been reached.

Phone Call Wednesday 23rd October 2024 at 2.35pm for 13 minutes

- Sharon Labi (SL) & Emma Bowman (EB)

Authored by Emma Bowman

- SL expressed her disappointment in receiving EB's email on Monday; she was under the impression our meeting was very productive.
- EB explained the issues raised in the email were not a personal attack on Tim Smith (TS); she is just concerned about getting the best outcomes for affected landowners.
- SL pointed out that she and TS took on board the importance of good landowner treatment.
- SL communicated her views regarding TS's suitability for his position – she said he's a great guy, and very committed to good landowner treatment and outcomes.
- EB raised the point detailed in her email regarding TS's lack of explanation, excuse or apology for not returning her phone calls. SL explained that she viewed the in person meeting as a new starting point, not a place for excuses or apologies for things that had already happened.
- EB reiterated her concern regarding TS's denial of any issues his team has encountered that landowners had previously flagged as problems with EnergyCo that were either overlooked or ignored. SL suggested, as did TS at the in person meeting, that his idea of an issue, and EB's, given the example she used, are obviously very different.

- SL commented that the feedback from the ACEREZ property team about landowner interactions to date was good. EB suggested SL consider that may be from one perspective – had anyone from outside the property team witnessed that, and/or had affected landowners been asked their opinion on the contact to date with ACEREZ surrounding the transmission project?
- EB raised the matter of TS informing her, at the in person meeting, that there was a map of the changed main Energy Hub accommodation layout in the Industry Forum presentation, when it seems this was not the case. SL believes the map was in a presentation to Council, not community – there have been a lot of meetings and presentations made. SL commented that she believed EB taking issue with this was just semantics.
- SL pointed out that both she and TS, spent nearly 4 hours at the in person meeting, showing the importance to them. TS even cancelled another scheduled meeting to enable more time. He also went back to the office and changed landowner paperwork to reflect our discussion around biosecurity issues with the project.
- SL confirmed that the mention of a Workforce Accommodation Camp at Elong Elong in the July 2024 EnergyCo CRG meeting minutes is an error.
- SL didn't have any knowledge about the CRG meeting minutes comment – “proposed back-training for farm workers”.

Correspondence

ACEREZ 01.

From: Kate O'Shaughnessy

Subject: ACEREZ Meeting Notes from 15012025

Date: 21 January 2025 at 6:59:18 PM AEDT

To: Emma Bowman

Cc: Jodie Barrington

Dear Emma,

I hope you're doing well. My apologies in the slight delay in getting these to you.

I do not have David's email address—would you mind sharing it with me? Alternatively, if you're able to, could you kindly forward these notes to him?

Attached are the meeting notes from our discussion at White Rose Café, Dunedoo, on Wednesday, 15th January 2025.

If you have any feedback or suggestions for revisions, please feel free to let me know.

I look forward to hearing from you.

Kind regards,

Kate O'Shaughnessy

Place Manager

From: Emma Bowman

Subject: Re: ACEREZ Meeting Notes from 15012025

Date: 22 January 2025 at 9:42:06 PM AEDT

To: Kate O'Shaughnessy

Cc: Jodie Barrington

Hi Kate,

I appreciate you sending the notes through. I have forwarded them to David and will read through them when I get a chance and let you know if there are any issues.

Please note that I did not get an update on our proposal from Tim today as promised.

Regards,
Emma

ACEREZ 02.

From: Emma Bowman

Sent: Friday, January 17, 2025 1:35 PM

To: Miranda Wood

Subject: Fwd: ACEREZ contacts

Hi Miranda,

Please see below email sent to Sharon Labi. I have received an out of office email from Sharon so wondered if you could help me?

Many thanks,
Emma

Begin forwarded message:

From: Emma Bowman

Subject: ACEREZ contacts

Date: 17 January 2025 at 1:29:46 PM AEDT

To: Sharon Labi

Hi Sharon,

I hope this finds you well.

I have no doubt you are aware of the meeting I attended in Dunedoo on Wednesday morning with Tim Smith, Kate O'Shaughnessy, Tung Pham (via zoom) and EnergyCo's Rebecca Williams. As we have previously discussed it is very difficult for community members to keep track of the corporate "family tree" that is EnergyCo, and we are now faced with ACEREZ on top of that.

I wondered if you would be willing to send me the layout, and position titles of the ACEREZ Design and Construct team for me to get my head around?

I would also appreciate you sending me Kate's contact email as I would like to follow up on the notes from Wednesday's meeting.

Thanks for your assistance.

Kind regards,
Emma

From: Miranda Wood

Sent: Monday, 20 January 2025 9:51 AM

To: Emma Bowman

Cc: Jodie Barrington

Kate O'Shaughnessy

Subject: Re: ACEREZ contacts

Hi Emma,

Thanks for your email. Jodie Barrington, from ACEREZ Design and Construct, is best placed to help you and I've looped her into this reply. She will directly follow up with you.

Kate O'Shaughnessy's email is

and I've also copied her in.

Kind regards,
Miranda

From: Kate O'Shaughnessy

Subject: RE: ACEREZ contacts

Date: 20 January 2025 at 4:06:30 PM AEDT

To: Emma Bowman

Cc: Jodie Barrington

Hi Emma,

Thank you for your email. I hope you're doing well.

Jodie is unwell today; she will be able to respond to your request regarding the ACEREZ Design and Construct team layout and positions tomorrow.

In the meantime, I will ensure that the notes from Wednesday's meeting are with you by the close of business tomorrow.

Kind regards,

Kate

From: Emma Bowman

Subject: Re: ACEREZ contacts

Date: 20 January 2025 at 4:39:32 PM AEDT

To: Kate O'Shaughnessy

Thanks Kate. Appreciate your reply.

Emma

From: Emma Bowman
Subject: Re: ACEREZ contacts
Date: 24 January 2025 at 9:37:27 PM AEDT
To: Jodie Barrington
Cc: Kate O'Shaughnessy

, Sharon Labi

Hi Jodie,

This is a reminder that you are yet to reply to the below email request. I would appreciate a reply at your earliest convenience.

I would also request that you please email me a copy of the notes taken during the phone call with Tim Smith today in a timely manner.

Regards,
Emma

ACEREZ 03.

On 13 Jan 2025, at 4:00 PM, Jodie Barrington

wrote:

Hi Emma

I'm following up from your recent email to Trevor Armstong requesting a meeting regarding removal of trees on Merotherie Road.

As Mr Armstrong advised, ACEREZ Design and Construct Director Project Wide, Tung Pham, will be available at 9am – 10am on Wednesday 15 January 2025 to meet with you.

Would it be possible to meet at The White Rose cafe in Dunedoo?

Also attending will be Kate O'Shaughnessy from ACEREZ, who will take notes of the meeting.

Rebecca Williams from EnergyCo will also attend.

Could you please advise who will be attending with you?

Regards
Jodie

Jodie Barrington
Stakeholder Engagement Manager

From: Emma Bowman

Subject: Re: ACEREZ - meeting with Tung Pham

Date: 13 January 2025 at 11:04:48 PM AEDT

To: Jodie Barrington

Cc: Kate O'Shaughnessy

, Rebecca Williams

Hi Jodie,

David Seis and I will be at the White Rose Cafe in Dunedoo at 9am on Wednesday 15th January.

I trust Mr Armstrong passed along my request that any plans for the road upgrades and the layout of the Main Energy Hub as it currently stands be available for our viewing?

Regards,
Emma

ACEREZ 04.

-----Original Message-----

From: Emma Bowman

Sent: Sunday, 5 January 2025 12:30 PM

To: CEO

Subject: Merotherie Road trees

Dear Mr Armstrong,

During a meeting with a number of landowners from within the Central West Orana REZ in late December 2024 it was brought to my attention that to facilitate the upgrade of the Merotherie Road (between the Golden Highway and Birriwa Bus Route South) the vast majority, if not all, of the trees currently inhabiting in the road corridor will be removed. Given the reaction of all of the landowners in the meeting, some who live in the immediate vicinity, it was obvious this had not been adequately, if even, discussed as part of the community consultation regarding the transmission project and its impacts on the local area.

Within that road corridor there are numerous markers indicating areas of "High Value Biodiversity". Has this been considered when designing the road upgrades for the CWO REZ transmission project?

I believe there is a clear alternative to clearing the trees within the aforementioned Merotherie Road corridor which would result in much less environmental devastation and be a show of good will to the local community; something that has been severely lacking through the process to date. I would like to request a meeting between local landowners, yourself, CEO of ACEREZ, and the new CEO of EnergyCo to put forward our proposal. I am aware that process will dictate that we must meet with the "appropriate" team member of each organisation but, if I can be frank, local landowners and community members, myself included, are fed up with wasting their time discussing issues with staff who don't accurately relay feedback, can not answer questions and/or have no decision making power to change any outcomes.

I look forward to your response and hope we can work together toward the best outcomes.

Yours sincerely,
Emma Bowman

On 10 Jan 2025, at 2:46 PM, CEO

wrote:

Dear Ms Bowman,

Thank you for your email.

ACEREZ Design & Construct Director Project Wide, Tung Pham, is the most suitable person to meet with and would be happy to hear your proposal. He is available to meet this Wednesday 15 January and we can facilitate that meeting for you or find an alternate time if that does not suit.

Kind regards,

Trevor Armstrong

From: Emma Bowman
Sent: Sunday, 12 January 2025 9:33 AM
To: CEO
Subject: Re: Merotherie Road trees

Dear Mr Armstrong,

I can meet with ACEREZ Design & Construct Director Project Wide, Tung Pham, on Wednesday 15th January; I am however only available in the morning, a start time of 8.30am or 9am would be preferable. I will take one or two other local landowners with me.

Could I please request that any plans for the road upgrades and the layout of the Main Energy Hub as it currently stands be available for our viewing?

Given I am forfeiting my time voluntarily in an attempt to better the outcomes of the CWO REZ transmission project I would appreciate an assurance from you that if this meeting is not to our satisfaction you will consider facilitating the meeting that I originally requested between local landowners, yourself and the CEO of EnergyCo?

Kind regards,
Emma

From: CEO
Subject: RE: Merotherie Road trees
Date: 13 January 2025 at 3:25:08 PM AEDT
To: Emma Bowman

Dear Ms Bowman,

Thank you for agreeing to meet with ACEREZ Design and Construct Director Project Wide, Tung Pham, on Wednesday.

ACEREZ Design and Construct Stakeholder Engagement Manager, Jodie Barrington, will contact you directly to arrange who will be attending and logistics for the meeting.

Kind regards,

Trevor Armstrong

From: Emma Bowman

Subject: Request for meeting - CWO REZ transmission project

Date: 27 January 2025 at 12:10:15 PM AEDT

To: CEO

Cc: Dave Seis

Dear Mr Armstrong,

I am disappointed and extremely frustrated to be contacting you again so soon, but given what has transpired in the last ten days I believe your presence is required, more than ever, on the ground in the CWO REZ.

Attached to this email are four sets of meeting notes (three written by myself and David Seis, and one written by an ACEREZ employee). Also forwarded is an email chain between myself and Sharon Labi to put the phone call notes in perspective. I am disheartened that I have already learnt to make my own notes from meetings or risk having important topics of conversation, and/or points made, omitted.

As you know, David Seis and I met with Tim Smith, Kate O'Shaughnessy and Rebecca Williams from EnergyCo in person on 15th January 2025. Tung Pham joined via a poor video link. As you will see by the notes we covered a range of topics, much to Tung Pham's disgust - more than once informing David and myself that we needed to focus on the purpose of the meeting which was to propose an alternative to the current Merotherie Road upgrade design. At this point I think it would be prudent to make it clear that neither David, nor myself had seen the current designs for the road upgrade prior to that meeting - the information we were relying on to inform our proposal, and the reason we requested the meeting came from a source other than ACEREZ highlighting the lack of community consultation to date.

At the in person meeting Tim Smith, under sufferance, said he would contact me on the following Wednesday to provide an update on our alternate route proposal. I had to ring Tim on Thursday afternoon and he said he'd seen an email from the design team that morning but had been on the road all day and hadn't had a chance to look at it - no apology for not ringing the day prior. He assured me he would ring on Friday morning to provide the update I was chasing. Friday morning came and went so I tried to ring Tim at approximately 12.10pm, there was no answer so I sent the following text message - "Hi Tim, I'm sure you've noticed the morning has been and gone with no sign of the phone call you assured me I'd get. I can't say I'm impressed as I had to chase you up yesterday after you didn't provide the promised update regarding Merotherie Road on Wednesday. I have better things to do than chase information from ACEREZ. Emma Bowman." He returned by phone call a bit after 12.30pm; I will let you read for yourself what occurred during that conversation. (NB: I have requested meeting notes from Jodie Barrington for that phone call but have not yet received them.)

I question Tim Smith's suitability for the position he has been employed to undertake if he does not have the mental capacity to deal with what he described as an HR issue within his team and continue performing the remainder of his role, or delegate to a colleague. I do not think it is acceptable that community members, who are unpaid, should have to continually chase promised information/updates from ACEREZ staff. I understand that personal issues arise from time to time but ACEREZ should have a

process in place to ensure those affairs do not impact the business and the services that should be provided, especially to community, given the importance that the organisation places on community engagement according to the website.

I have given ACEREZ staff every opportunity to adequately consult with the community and that is not what is happening to date. I understand that financial close is a stumbling block but as relayed to both Kate O'Shaughnessy and Jodie Barrington, among Tim Smith and Tung Pham, ACEREZ needs to halt all works, completely, until meaningful and transparent consultation with the community can be carried out.

Again, I request a meeting between local landowners, yourself and the CEO of EnergyCo to adequately address the issues at hand - specifically the Merotherie Road upgrade at this stage.

Kind regards,
Emma Bowman

ACEREZ 05.

From: Emma Bowman
Sent: Monday, 11 November 2024 8:42 PM
To: Jodie Barrington
Cc: Sharon Labi
Subject: Landowner meeting

Dear Jodie (& Sharon CC'd),

As you are aware I was invited to the property "Merotherie" by the owners, the Bowman family, who happen to be relations of mine, to be present at the meeting between the aforementioned landowners and ACEREZ representatives held last Friday, November 8th 2024. It is my understanding that upon being informed by Mrs Bowman of my attendance you contacted her by phone to express your concerns and suggested, or rather possibly insisted, I not be present at the meeting.

I would appreciate an explanation of why this decision was reached by you, and/or the ACEREZ team?

Should it not be up to each individual landowner to decide who they would like present during any discussions? Is it acceptable for ACEREZ exclude family members, who are invited for support purposes, from attending landowner meetings?

Regards,
Emma

On 19 Nov 2024, at 11:14 AM, Jodie Barrington

wrote:

Dear Emma

Thank you for your email regarding the landowner's meeting with Jim and Mandy Bowman on 8 November. Apologies for not replying sooner as I was unwell last week.

The meeting with Jim and Mandy was to provide directly impacted landowners with an update about the Merotherie Road and Golden Highway upgrade and to seek their input and feedback.

When I spoke with Mandy over the phone, I explained the purpose of the meeting and that we wanted to understand how they use Merotherie Road for stock movements and access in and out of the property. This would help inform our design and traffic planning.

Mandy mentioned you would attend to represent the community, and I explained that this was a landholder-specific meeting and we were happy to meet with you at any time to discuss broader community issues. At no point did we seek to exclude anyone from the meeting.

We are always available to engage with you on a broad range of issues and I know you recently met with my colleagues, Sharon and Tim, for several hours. If you would like to catch up with Sharon again, she will be in the REZ in early December.

If you have any questions or there's anything we can help with in the meantime, please don't hesitate to get in touch.

Kind regards
Jodie

From: Emma Bowman
Subject: Re: Landowner meeting
Date: 3 December 2024 at 9:37:28 PM AEDT
To: Jodie Barrington
Cc: Sharon Labi

Jodie,

Apologies for the delayed reply - there has been a lot going on in recent weeks.

Your explanation below does not reflect the phone call as Mandy relayed it to me, in fact, I'd go so far as to say it is a gross misrepresentation of the actual conversation, and after speaking to Mandy it seems we are in agreement regarding the content from her perspective. I can only assume you will counter this claim but I wonder what reason Mandy would have to fabricate such a story and I wanted my statement on the record. I note that you rang Mandy so there was no written correspondence to fall back on. The reason Mandy asked me to attend was as support for the family, given my knowledge of the project, and to keep me informed about how ACEREZ is treating landowners.

I would also like to raise that the Bowman family were promised written records of meetings, the first of which was months ago, yet no documentation has been provided to date for either of the two meetings. When will this commitment be fulfilled?

I take issue with your statements "we are happy to meet with you at any time to discuss broader community issues" and "we are always available to engage with you on a broad range of issues". You first made contact with me on the 9th of August and following me raising my concerns about dealing with 'community engagement' staff after many unsatisfactory and inadequate experiences with EnergyCo and renewable energy developers, and wanting to be put in touch with more senior ACEREZ employees you stated on 13th August 2024 that "As I mentioned, I am happy to facilitate a meeting either online or in person. If you could please let me know any specific concerns you would like to discuss, I can ensure the right team members are in the meeting to answer your questions." As

requested, I provided what Sally Edwards and I thought were the highest priorities at the time to which you replied "I can arrange a meeting within the next few weeks, when I have more idea of timing I will be in touch to arrange. I think it'll also be useful to set up a regular catch-up between us to keep you updated on our project. We can talk about this when I meet with you and Sally." - 16th August 2024. Following a gap in communications (both email and phone) on your part you suggested a meeting in mid September, yet when that wouldn't work for Sally and myself, and neither would the in person option at the end of September I suggested a zoom meeting. You then left that email offer unanswered until the 24th September (two weeks later) when you stated "We have to unfortunately postpone a meeting until we have some further clarity on our program and activities." Despite your claims to the contrary it has been made blatantly obvious to me that it is not the intention of the ACEREZ Design and Construction team to "mutually work together" with myself or Sally.

It is my belief that the reason Sally and I were invited to meet with Sharon and Tim was because of the email I sent ACEREZ CEO Trevor Armstrong regarding the correspondence between myself, you and Sally up until that date. Given that you have still not provided a reply to the questions contained in my email to you on the 25th September 2024, and your explicit wishes for me not to be present at the Merotherie meeting I have not had my concerns about ACEREZ's community engagement allayed.

Regards,
Emma

On 16 Dec 2024, at 3:41 PM, Jodie Barrington

wrote:

Dear Emma,

Thank you for your email.

I can advise that Mandy and Jim have received notes from all meetings ACEREZ has held.

I know you discussed many of the issues raised in your email of 25 September with Sharon and Tim on 18 October but here is some further information you may find useful:

Regarding landowner engagement:

- Our Property Team has ongoing engagement with landowners and has met with approximately 75% of host landowners as part of the Property Access Plan (PAP) process. We also regularly meet with Merotherie and Elong Elong energy hub neighbours and will continue to keep them informed as we develop our construction program. Further landowner engagement including face-to-face meetings will be held next month and will include an update on the Merotherie Road upgrade.

Regarding engagement with local councils:

- Regular interface meetings have been taking place with Warrumbungle Shire Council and Mid-Western Regional Council and include the upgrade of Merotherie Road and the intersection with Golden Highway. Members of the Project Team have developed relationships with key council team members and technical discussions take place at regular council interface meetings.

Regarding community health and wellbeing:

- All community members in the Central-West Orana REZ may access free and confidential support by calling an independent support line, available 24 hours a day, seven days a week.
- A Social Impact Management Plan (Plan), led by EnergyCo, is under development to understand the cumulative social impacts in the Central-West Orana REZ. The Plan builds on the Social

Impact Assessment in the EIS and will give us greater understanding about where to provide support to ensure the wellbeing of the local community and provide recommendations for mitigation measures to enhance social cohesion. EnergyCo will conduct stakeholder engagement in the new year.

Regarding impacts on private property during construction:

- We understand the concerns about project construction activities impacting on private properties including farming activities, access, safety and security. Our dedicated Property Team is meeting with directly-affected landowners each week to work on individual Property Access Plans to recognise their unique access requirements. These requirements will be respected and closely complied with prior to any work on a property commencing. This will include biosecurity training and implementing measures to minimise impacts as much as possible. Each landowner has a dedicated property advisor to provide continuity and build a relationship. Landowners and all community members will also have access to a 24/7 project information line to make enquiries, provide feedback or make a complaint.

Regarding management plans:

- Project-related management plans will be available on the project website once they have been approved by EnergyCo and the planning approval authority.

If you have any other questions relating to ACEREZ, please don't hesitate to get in touch with Sharon or me.

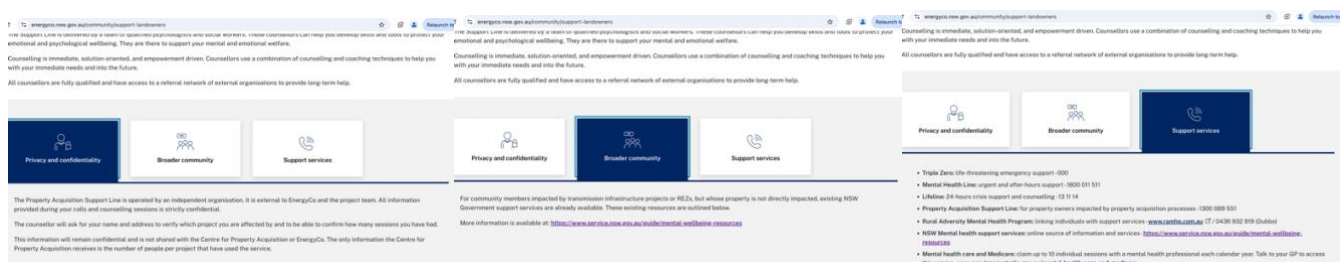
Kind regards
Jodie

From: Emma Bowman
Subject: Re: Landowner meeting
Date: 16 December 2024 at 5:32:44 PM AEDT
To: Jodie Barrington
Cc: Sharon Labi

Jodie,

I haven't fully digested your email below as yet but the following was too urgent to leave unattended until I have adequate time to go through the whole email.

I respectfully ask you to check your facts with regard to the Property Acquisition hotline (1300 089 551). I have just called the number myself and was told that unless I am directly affected by NSW Government Property Acquisition I am not eligible for support through that avenue. I would also suggest that you check the EnergyCo website with regard to this - see below screenshots.



We have been calling for mental health support for inhabitants of the CWO REZ for more than 12 months and EnergyCo, nor the NSW Government, have provided any assistance. It is not acceptable that EnergyCo expect the existing services, which are all under resourced, to manage the impacts directly caused by the rollout of the renewable energy zones.

I would also ask that you send any information regarding the 24/7 property information line - is it up and running yet? When will it be available?

When will the ACERREZ website be online?

Regards,
Emma

On 17 Dec 2024, at 12:33 PM, Jodie Barrington

wrote:

Dear Emma

I have discussed the Property Acquisition Hotline with EnergyCo and they will respond to you directly.

The 24/7 information line, 1800 298 379, will be up and running prior to Christmas.

The ACERREZ website is expected to go live early in the new year.

Kind regards
Jodie

From: Emma Bowman
Sent: Tuesday, 17 December 2024 4:26 PM
To: Jodie Barrington
Cc: Sharon Labi
Subject: Re: Landowner meeting

Hi Jodie,

When should I expect a response from EnergyCo? As you can imagine I'm not overly pleased with being deliberately misled; nor should you be!

What mental health services will ACERREZ provide to the community following financial close of the CWO REZ transmission project?

Will there be a media release of some description regarding the 24/7 information line so landowners and community members are aware of its existence?

What sort of information will be available - is it similar to a "drop in session" where community members are told their questions will be taken on notice only to never hear from staff again?

Regards,
Emma

From: Jodie Barrington
Subject: RE: Landowner meeting
Date: 19 December 2024 at 12:56:21 PM AEDT

To: Emma Bowman

Cc: Sharon Labi

Hi Emma

Thank you for your email.

Mental health services will continue to be provided by EnergyCo.

Landholders will be informed of the hotline in the first instance and broader communication of the hotline will be made in due course.

Wishing you and your family well over the festive season.

Kind regards

Jodie

ACEREZ 06.

From: Emma Bowman

Sent: Monday, October 21, 2024 9:50 AM

To: Sharon Labi

Cc: Sally Edwards

Subject: Re: ACEREZ meeting

Dear Sharon,

Thank you for taking the time to meet with Sal and I on Friday. I think I can speak on behalf of both of us when I say we hope this will be a valuable working relationship to gain the best outcomes for the landowners and communities concerned, particularly those directly impacted by the CWO REZ transmission project.

I have given our meeting and discussion a lot of thought over the weekend. In the interest of the honest and transparent relationship I believe we are all seeking to establish I wanted to raise a couple of concerns with you.

I hope I managed to convey to you the importance of considered, professional and mindful treatment of transmission affected landowners? Given a number of answers and comments made by Tim at our meeting, who oversees the Property Team, I am very concerned our friends, neighbours and community members are still not going to be treated with adequate consideration and respect, as they deserve, especially given the treatment they have already endured at EnergyCo's hands. For example, when I asked Tim about any issues he has encountered, that were flagged by landowners to EnergyCo throughout the "negotiation" period, he denied that there had been any. Like I said in the meeting, I can assure you that is not the case. I feel he is underplaying the seriousness of some of these issues (maybe in an attempt to assure community members that all is well and on track for construction?) and over exaggerating the relationships he believes he has built with landowners to this point. Neither of those things sit well with me. Does Tim have demonstrated experience dealing with landowners that have been through, or been threatened with, compulsory acquisition? I only ask this as I wonder if it was considered that the Property Team should be run by someone with that or previous experience in the

field, who doesn't have another management position, such as Design and Construction, on their plate as well?

I also felt Tim did not take on board my feedback regarding being contactable. There was never an apology, explanation or even excuse as to why he did not return either of my phone calls. If he goes to town meetings assuring the community how easy he is to get in touch with and how he'd like to hear from people that should certainly be the case.

The other issue I have is around the layout for the workers accommodation at the main Energy Hub. When I asked about that Tim said the changes were shown in the Industry Forum presentation. I will happily be corrected but I have gone through the presentation slides that were sent to me by EnergyCo following the forum and can only find the layout of the camp (page 25 of the attached industry forum presentation slides) which I raised at our meeting. I will hold judgement on this until you can confirm but, as I'm sure you can imagine, I won't be at all impressed if I've been "misled".

I also read through the most recent (July 2024) Community Reference Group (CRG) minutes and wondered if you could clarify a couple of things for me please.

1. The minutes state "Three proposed Workforce Accommodation Camps, as per the EIS: Neeleys Lane, Elong Elong and Merotherie. Stakeholder notifications occurring over the next three to six months to meet conditions of consent." I have never seen anything about a worker accommodation camp at Elong Elong?

2. "Discussion around origin of workers. Dubbo Regional Council don't want local workers taken away from local businesses. Prefer that employees come from outside the LGA.

EnergyCo will consider establishing an office in Mudgee. It is proposed that back-training will be provided for farm workers." It seems the worker problem has been discussed by DRC - I don't know how they can effectively stop local workers from taking a new job, but I'd suggest the problem is region, and possibly state wide. I'm confused about the "proposed back-training for farm workers"; can you shed any light on that statement?

I really do hope we can manage to make the best of what is a challenging situation.

Kind regards,
Emma

On 22 Oct 2024, at 1:58 pm, Sharon Labi

wrote:

Hi Emma,
Are you free for a chat tomorrow?
Thanks,
Sharon

From: Emma Bowman
Sent: Tuesday, October 22, 2024 4:41:14 PM
To: Sharon Labi
Cc: Sally Edwards
Subject: Re: ACEREZ meeting

Hi Sharon,

I'm more than happy to chat. Tomorrow is just an unknown for me at the moment, and is weather dependent, which I understand might be difficult for you to navigate. I will know by 7am if I'm available until mid morning.

Did you have a time in mind? If any time before 10am would suit I can send you a text and let you know at 7am if I'm going to be available.

If that's too hard I can make some time on a Thursday or Friday.

Kind regards,
Emma

Sent from my iPhone

On 22 Oct 2024, at 4:49 PM, Sharon Labi wrote:

Hi Emma,
I have other commitments tomorrow before 10am but free any time after that. Otherwise Thursday after lunch suits too.
Thanks,
Sharon

From: Emma Bowman
Sent: Friday, 1 November 2024 11:22 AM
To: Sharon Labi
Cc: Sally Edwards
Subject: Re: ACEREZ meeting

Hi Sharon,

Thank you for your time on the phone last Wednesday afternoon. I have been meaning to email you since then but life has been getting in the way.

I wrote some notes following our conversation and I wondered if you too would find it beneficial to have a copy (document attached)? I believe it is important for both of us to have a record and accurately remember our conversations in the future.

I have thought a lot about our discussion, and more about our in person meeting since talking to you on the phone and thought a bit more of an explanation may help you understand where I was coming from with my previous feedback. I also realised, upon reflection, that while you were disappointed to receive my previous email, I too have become somewhat disheartened. What you described as semantics on my behalf was what I would describe as attention to detail and the expectation that a person in a management position be able to acknowledge and accept feedback. Admitting when things could be improved enhances trust and credibility, and will assist in building meaningful and valuable relationships with local community members and affected landowners.

Sharon, I believe you are an empathetic person, and there are things no-one can possibly know until they become lived experiences or they are values, and a way of life, that is all you know. While you will no doubt do your best to make ACEREZ's project a success (after all, that is part of being an employee) every intended, or unintended consequence of the CWO REZ transmission project will have impacts on my friends, family, community, home, livelihood and industry - whether they be positive, or negative; I

doubt the outcome of any of these impacts will have the potential to drastically change ACEREZ as a company.

If you read the document Sal handed to you at our meeting you will have some idea of what our region has endured in recent times. Everybody goes through tough times, but when your business, employment, life and community are so intrinsically intertwined it is near impossible to separate them, those hard times can really take their toll emotionally, physically and financially. When you work in agriculture, or rely on the sector for your business to succeed, you soon learn to take control of what you can because so much is variable, and completely out of your control. Hence the voluntary hours I, and others, have put in to attempting to protect our community, region and home from any unforeseen negative impacts, and the resistance and concern EnergyCo has seen from transmission affected landowners.

Governing bodies, such as EnergyCo, the Department of Planning, Housing & Infrastructure (DPHI) & the Independent Planning Commission (IPCn) are constantly referring to the impacts of large scale renewable energy infrastructure projects as “insignificant” & “negligible” when these things could ultimately mean the difference between success and failure of rural and regional businesses, catastrophic damage to the environment, a complete change of landscape and the loss of small, rural communities. This assessment does not adequately take into consideration the real, on the ground, ramifications felt by people, businesses and communities affected by such impacts. This is where so much frustration comes in to play, especially in communities where the most severe negative effects are being felt yet the biggest expected benefits are to be realised hundreds of kilometres away; out of sight, out of mind.

Sharon, I wonder if you would think about your home? Is it not only a place where you reside, but your business and your life; somewhere you can't fathom ever leaving? A place that has been owned by generations of your family for nearly 150 years in a district where your ancestors have worked hard to produce food and fibre for Australians for over 200 years? Have you ever been responsible for thousands of livestock; sheep and cattle that are not only what makes your business profitable, but that have decades, maybe even over a hundred years of hard work and breeding decisions behind them? The health and wellbeing of these animals is paramount, not only because they are what keeps your business afloat, but they are also your passion - the buck stops with you if they run out of feed and/or water. Is your home within a community that is renowned for rallying around people when times are tough; generous people who would give you their last dollar or the shirt off their back? Has the place you call home ever been through a natural disaster where you've spent days shooting and burying sheep, treating injured livestock and transporting animals to safe places, and months repairing and replacing infrastructure for friends and acquaintances, voluntarily, because that is what you were brought up to do? Is the home you hold so dear about to be turned from the quiet & scenic landscape you have enjoyed and admired your whole life to an industrial area; a change that has the potential to drastically impact business output, transport and traffic, water sources, the environment, visual amenity, increase fire risk and restrict fire fighting options, and that has already torn your once cohesive community apart?

The point I am trying to make is that whilst the CWO REZ transmission project is said to be “in the public interest”, and essentially “for the greater good”, I am not currently aware of one employee of EnergyCo, DPHI or ACEREZ involved in the rollout of the project to date that will be personally impacted, in their own home or business, by its construction and/or operation. Any negative impacts will, however, be felt by landowners, businesses and communities forevermore. This is why there has been so much concern from affected landowners and community members and why people like Sal and myself believe there needs to be more active collaboration with local people, and less reliance on computer modelling, data and the like. Concerns have been compounded by recent announcements like the Port to REZ road upgrades

(I am aware this is not something under ACERZ's control). The nineteen sites for upgrade are bends and intersections; there is currently no allowance for overtaking lanes, rest stops large enough to accommodate the OSOM loads, nor any plans for the townships of Merriwa or Dunedoo that will see OSOM loads moving through their main streets. This is just one of a multitude of issues we are facing on the ground with no real solutions, yet the transmission project keeps marching on.

I wrote this email with the aim of assisting you to understand my perspective and I sincerely hope that we can find a way to work to ensure there are less unforeseen negative impacts to the communities and region that I will be a part of for many years to come.

Kind regards,
Emma

On 7 Nov 2024, at 11:12 am, Sharon Labi wrote:

Hi Emma,
Thank you for your email last week.
Attached please find a map of the Merotherie site you requested from Tim.
Regards,
Sharon

ACERZ 07.

From: Emma Bowman
Subject: Fwd: CWO REZ transmission project
Date: 25 September 2024 at 4:07:27 PM AEST
To:

Dear Mr Armstrong,

My name is Emma Bowman. I am a farmer from [redacted] and I have been actively working to advocate for and protect the communities within the Central West Orana Renewable Energy Zone for some time now.

I write to you today in an effort to inform you of the effort myself and another community member, Sally Edwards, have put into attempts to work with ACERZ staff with regard to issues surrounding the Central West Orana Transmission project, and their ultimate collapse. We are beyond frustrated and disappointed in the process to date, exacerbated by the dissatisfaction and failure of EnergyCo to properly engage with the affected communities.

You will gain a better understanding of the interaction between myself, Sally and ACERZ's Community Engagement Manager, Jodie Barrington after reading the forwarded email chain below. I hope you will contemplate, and ultimately value, the benefit of having local input and establishing relationships with people who have the local communities best interests at heart.

Your time and consideration is appreciated.

Yours sincerely,
Emma Bowman

ACEREZ 08.

On 9 Aug 2024, at 2:07 PM, Jodie Barrington

wrote:

Hi Emma

I'm following up on my recent phone call.

As I mentioned, I work with Tim Smith and I was also at the Industry briefing forum on Tuesday evening.

I understand you emailed Sharon asking for Tim's details regarding some issues raised during the meeting.

I would be happy to discuss these with you and if I can't answer at the time will find out the details and come back to you.

Please don't hesitate to contact me anytime by phone or return email.

Regards
Jodie

Jodie Barrington
Community Engagement Manager

From: Emma Bowman
Sent: Sunday, August 11, 2024 9:59 AM
To: Jodie Barrington
Subject: Re: CWO REZ transmission project

Hi Jodie,

I apologise for missing your call on Friday, and would like to thank you for getting in touch.

Whilst I appreciate your offer to liaise regarding the issues I have about the CWO REZ transmission project I have been down the 'community engagement' route with EnergyCo and renewable energy developers in the past and am not willing to waste my time, or yours, doing the same again.

My worst fears regarding "community consultation and engagement" were realised at the Industry Forum on Tuesday evening in Dunedoo. The meeting only highlighted the fact that a lot of major issues raised by community members over the past two years with EnergyCo representatives have fallen on deaf ears.

I would appreciate if you could put me in touch with Tim Smith directly.

I have attached my submission to the CWO REZ transmission project EIS for your information.

Regards,
Emma

From: Jodie Barrington
Sent: Sunday, August 11, 2024 6:39 PM
To: Emma Bowman
Subject: RE: CWO REZ transmission project

Hi Emma

Thanks for responding and for attaching your EIS submission.

I am happy to facilitate discussions with our team to answer questions you have, I will come back to you shortly to arrange.

Regards
Jodie

On 13 Aug 2024, at 5:57 PM, Jodie Barrington wrote:

Hi Emma

I wanted to take the time to read through your EIS submission and understand some of your key concerns, such as construction impacts on livestock enterprises, traffic changes, biosecurity, first aid, bushfire and flood management, just to name a few.

We are aware there will be many challenges as we access landowner properties and start the construction of the transmission project. We want to work with community members and residents to minimise the impacts as much as possible. As the sites are being handed over to ACEREZ, it is essential to build trust with the community, and we want to start it off on the right foot.

As I mentioned, I am happy to facilitate a meeting either online or in person. If you could please let me know any specific concerns you would like to discuss, I can ensure the right team members are in the meeting to answer your questions.

We welcome your local knowledge and feedback and look forward to further discussions with you to get your insight into issues impacting the community.

Please let me know if there is anything further and which topics are a priority so we can arrange a time with the appropriate people. Please also feel free to call me directly.

Regards
Jodie

From: Emma Bowman
Sent: Wednesday, August 14, 2024 2:35 PM
To: Jodie Barrington
Cc: Sally Edwards
Subject: Re: CWO REZ transmission project

Hi Jodie,

I appreciate you taking the time to read my submission.

I have CC'd Sal Edwards in this email as I would like for her to be involved in discussions with ACEREZ. Sal is from North of Coolah and has been, like me, advocating for better community consultation and engagement throughout the whole CWO REZ Transmission project process to date.

As you said, there are so many challenges associated with infrastructure projects of this scale. The following are what Sal and I see as the biggest priorities at this stage, and the things we would like to start the discussions with ACEREZ regarding.

1. Active transparency & accessibility for landowners and communities - there are potential impacts and concerns that have been raised continually throughout the "consultation" period with EnergyCo that are still yet to be addressed. We would also like to see affected landowners actively engaged regarding what construction will look like on their properties.

2. Merotherie Road upgrade

3. Workers Camps - there needs to be ongoing discussions with community and council in regards to camps that will be bigger than our rural towns. Can you imagine our surprise when our first meeting with ACEREZ (the Industry Forum) was where community members learnt that the temporary workers camps would likely have better facilities than our rural centres?

4. Construction impacts

5. Impacts to existing services - ie. health, emergency, police

6. Bushfire risk & emergency planning

There are many other issues we would like to discuss but will start with the above and see where that leads us.

Sal and I would prefer in person meetings where possible. If you could send us some options for what suits the appropriate staff that would be appreciated.

I just wanted to reiterate that we are not interested in wasting our time with staff members who do not have the authority to make real change within the project to adequately address community concerns so would appreciate your help in making these meetings as productive as possible.

Kind regards,
Emma

On behalf of

Emma Bowman & Sal Edwards

Volunteers | Community Representatives | Advocates for Rural NSW

Warrumbungle Region, Central West NSW

On 16 Aug 2024, at 12:03 PM, Jodie Barrington

wrote:

Dear Emma and Sally

Thanks so much for responding and providing the discussion points below. They will help me bring the relevant subject matter specialists to our meeting so that we can have a constructive discussion with you and Sally about the points you raised.

Landowner engagement is of paramount importance to our project. We can't effectively build a transmission line without considering the unique access arrangements and farming activities of local farmers. We would be happy to run you through our landowner engagement process and it would be really helpful for me to understand the impacts and concerns you've previously raised with EnergyCo and reflect them in our engagement approach.

Many of the other points you raise are a work in progress eg. we have meetings arranged with the RFS and Police in the coming weeks. But we can share where we are at and considerations for way forward.

I can arrange a meeting within the next few of weeks, when I have more idea of timing I will be in touch to arrange. I think it'll also be useful to set up a regular catch-up between us to keep you updated on our project. We can talk about this when I meet with you and Sally.

Thanks
Jodie

From: Emma Bowman
Subject: Re: CWO REZ transmission project
Date: 25 August 2024 at 4:09:17 PM AEST
To: Jodie Barrington
Cc: Sally Edwards

Hi Jodie,

Just checking in re proposed meeting - have you come up with any possible dates?

Thanks,
Emma

From: Emma Bowman
Sent: Monday, 2 September 2024 12:25 PM
To: Jodie Barrington
Subject: Fwd: CWO REZ transmission project

Hi Jodie,

Could you please advise on the below at your earliest convenience?

Emma

On 5 Sep 2024, at 4:28 PM, Jodie Barrington

wrote:

Hi Emma

Apologies for the delay in coming back to you, I've been away.

I will be coming out to the Merotherie area week beginning Monday 16 September with some of our Directors and can arrange a time to meet with Sally and yourself.

Would you be available Wednesday, 18 September around 10am?

And if that is suitable if you could let me know a location to meet, we could come to Dunedoo if that would be best.

Regards
Jodie

From: Emma Bowman
Sent: Thursday, 5 September 2024 4:58 PM
To: Jodie Barrington
Cc: Sally Edwards
Subject: Re: CWO REZ transmission project

Hi Jodie,

It's been nearly 3 weeks since I last heard from you. In that email you said you would arrange a meeting within the next few weeks; I can't say I'm impressed with being strung along. I would've expected an auto reply to my emails if you were out of the office for an extended period of time?

I also hope you appreciate the fact that you are able to take time away from your job whilst community members and landowners, like Sal and myself, continue to bash our heads against the CWO REZ brick wall, UNPAID!, in an attempt to protect our farms, communities and environment, whilst putting aside our lives, businesses and families.

Before we commit to a meeting we would like to know:

1. Who will be in attendance (what roles)?
2. Are any topics off limits?
3. Is there any chance of us making real, meaningful change to things we see as major issues?

We would appreciate your honesty.

The week beginning the 16th is a busy one for both Sal and myself, and Wednesday 18th at 10am isn't suitable. Do you have other options (noting that Monday, Tuesday and Thursday are not available, neither is Wednesday am)?

I also want to raise that I have left two messages on Tim Smith's mobile without reply. This seems awfully akin to the treatment we have received from EnergyCo so you'll have to excuse the cynicism.

Regards,
Emma

On 10 Sep 2024, at 11:37 AM, Jodie Barrington

wrote:

Hi Emma

Thanks for coming back to me and your feedback.

I hear your frustration and I hope that we can establish a relationship to mutually work together.

I'd like to explain that we are still very much in the start up phase of the project, and working through contractual requirements with EnergyCo as well as changes to the Minister's Conditions of Approval as part of the planning approvals.

Please understand that we are working through processing the requirements and logistics that are required to deliver a large project such as this one, and we may not have the answers to some of your questions. Therefore nothing will be off the table but we would appreciate your insights as a local member of the community.

We are also still in the process of transitioning the leadership of the communication initiative from EnergyCo to ourselves and for now, they will lead on communications to the local community.

We have been focussing on the planning to contact landowners who will be hosting transmission infrastructure, this has taken our time and the reason why we have not planned a visit to the Merotherie area until the upcoming weeks.

Would any other time on Wednesday 18 September be suitable for you? I was hoping to arrange a time for you to meet with our Safety Director, who has been working on bushfire risk and emergency planning and health services.

Otherwise we can return the week of Monday 30 September. I understand this is a while away but with the challenges we are currently working through the start of construction has been delayed.

Or I can look to arrange an online meeting at a time suitable to you in the next couple of weeks with members of our Construction team if you would like to send some available times.

Regards
Jodie

From: Emma Bowman
Sent: Wednesday, 11 September 2024 3:33 PM
To: Jodie Barrington
Cc: Sally Edwards
Subject: Re: CWO REZ transmission project

Hi Jodie,

I understand that ACEREZ is in the "start up phase" of the project but as I have previously mentioned, we, as concerned community members, have been raising issues about the project with EnergyCo for some time now, and not getting anywhere, nor having them acknowledged by ACEREZ. It is important ACEREZ knows what a complete blunder the rollout of the CWO REZ, including the transmission project, has been to date, hence our apprehension and frustration.

Wednesday 18th is no longer an option, neither is the 30th. Sal and I are available for a zoom call on the afternoons of the 25th and 27th of September if that would suit you and your team?

Can you elaborate at all on the challenges you are facing that have delayed the start of construction? And how much of a delay you are expecting?

Regards,

Emma

From: Jodie Barrington

Subject: RE: CWO REZ transmission project

Date: 24 September 2024 at 12:38:18 PM AEST

To: Emma Bowman

, Sally Edwards

Hi Emma and Sally

We have to unfortunately postpone a meeting until we have some further clarity on our program and activities.

As you are aware, we received NSW planning approval on 26 June and the Commonwealth planning approval last month. We are currently working through these conditions as they are very detailed in how we need to deliver the project and we're working closely with EnergyCo to get to Contract Close.

While we are working through these details and prior to Contract Close, we need to work with EnergyCo to determine details of the planning Conditions of Approval so we can provide you, stakeholders and the wider community with accurate program information.

In the meantime I will attempt to answer your queries as much as possible and I hope to be able to arrange an in-person meeting as soon as possible.

1. Active transparency & accessibility for landowners and communities - there are potential impacts and concerns that have been raised continually throughout the "consultation" period with EnergyCo that are still yet to be addressed. We would also like to see affected landowners actively engaged regarding what construction will look like on their properties.

ACERES is currently in the process of meeting with landowners who will be hosting transmission infrastructure. The meeting also includes an Engineer from the Transmission team who can explain what construction will look like on their property and a Property Manager to discuss and agree access arrangements. The Property Manager will be a dedicated contact and will be available to answer any questions and work through any issues they may have.

2. Merotherie Road upgrade

We are currently consulting with Transport for NSW and Mid-Western Regional Council on the design of Merotherie Road. Once we have a draft plan for the upgrade, I will arrange to meet with landowners who live nearby to obtain their view and feedback.

3. Workers Camps - there needs to be ongoing discussions with community and council in regards to camps that will be bigger than our rural towns. Can you imagine our surprise when our first meeting with ACERES (the Industry Forum) was where community members learnt that the temporary workers camps would likely have better facilities than our rural centres?

The workforce accommodation has been designed with workers' health and wellbeing in mind to provide a safe and comfortable environment for them to rest and relax after work hours, and to retain our workforce as much as possible. We also have a contractual requirement to provide medical and emergency care to our workers and to not put strain on local emergency services. Once we reach

Contract Close later this year, I will be able to provide more details about when construction of the workforce accommodation will commence as well as the final design of the accommodation site.

4. Construction impacts

The planning Conditions of Approval outlines the strict environmental requirements that we must adhere to.

These conditions are required to

- Prevent, minimise or offset adverse environmental impacts
- Set standards and performance measures for acceptable environmental performance
- Require regular monitoring and reporting and
- Provide for the ongoing environmental management of the development.

The environmental conditions extend to but not limited to

- Noise and vibration
- Air quality
- Soil and water
- Biodiversity
- Heritage
- Traffic and transport
- Visual amenity
- Radiocommunications
- Hazard and risk
- Bushfire safety
- Waste
- Accommodation camps
- Local business and employment strategy
- Social
- Rehabilitation.

We will work closely with landowners, impacted neighbours, businesses and stakeholders to reduce the potential impacts during construction. This will include regular face to face meetings with landowners, a direct toll-free community hotline, project email inbox and making ourselves available at local markets and festivals to answer community enquiries. If any members of the community are potentially directly impacted by construction activities (e.g. livestock movements, traffic changes, road upgrades and noise), we will notify them personally in advance and mitigate the impacts as much as possible.

5. Impacts to existing services - ie. health, emergency, police

We are currently consulting with emergency services to understand how we minimise our impact on them as much as possible.

6. Bushfire risk & emergency planning

We are currently preparing our bushfire and emergency management plans and are consulting with relevant authorities. We also plan to get feedback from volunteer firefighters and local farmers to ensure emergency planning is fit for purpose, when these management plans are ready to share with the public.

I trust this answers some of your questions and I hope to be able to catch up in person soon. In the meantime, if you have any queries about the project please don't hesitate to email me.

Regards
Jodie

From: Emma Bowman
Subject: Re: CWO REZ transmission project
Date: 25 September 2024 at 11:12:45 AM AEST
To: Jodie Barrington
Cc: Sally Edwards

Hi Jodie,

On the 16th of August you wrote "I can arrange a meeting within the next few of weeks, when I have more idea of timing I will be in touch to arrange. I think it'll also be useful to set up a regular catch-up between us to keep you updated on our project. We can talk about this when I meet with you and Sally." What has happened since that time? Who decided a meeting with Sally and I would not be as beneficial as you first thought? This is why I didn't want to waste my time dealing with ACERZ's Community Engagement staff - all talk, no action, and no authority to make change on the project - exactly the same process we had with EnergyCo! Yet, as I have previously informed you, Tim Smith will not answer nor return my calls even after him saying how contactable he would make himself at the Industry Forum in Dunedoo in early August so getting any contact with ACERZ has been very difficult.

ACERZ's introduction into the community has not instilled any confidence for what is to come, nor is it looking like we can "establish a relationship to mutually work together" as you previously said you desired. This is "community engagement" with EnergyCo on repeat - very disappointing!

I'm extremely concerned about how ACERZ will work with EnergyCo to "determine details of the planning Conditions of Approval so we can provide you, stakeholders and the wider community with accurate program information" when EnergyCo has not taken on board potential issues or provided any assurances on how community concerns will be overcome - community will be left out of the decision making yet again!

1. What percentage of transmission affected landowners have had a meeting with ACERZ to date?
2. Part of the Merotherie Road to be upgraded is located in Warrumbungle Shire Council, and the bridge is, according to WSC staff, their responsibility - why is WSC not being consulted regarding the design of the Merotherie Road?
Maybe talking to local landowners prior to making draft plans would be a better idea? They are, of course, the ones that will be impacted by any errors made. The Talbragar River is very important to this region, and any mistakes made will ultimately impact all landowners upstream and downstream of the Merotherie Road. I hope the weight of this upgrade on the region is at the forefront of any design and construction.
3. I'm pleased ACERZ is so concerned for the health and wellbeing of their workforce - what about the health and wellbeing of the local community? This project has already caused irreparable damage to the mental health of this area, family relationships and friendships, and extreme stress and anxiety, and ultimately ill health.

4. These are things that are required, it does not mean it's what will happen. There have already been gates left open on properties leading to expensive mistakes for landowners (rams being let in with ewes before joining time). Will you, or someone else, be following all work crews around to ensure everything is left in an acceptable manner or will the onus be on landowners to check their properties at all times?

5. Should this not have been done prior to project approval? This is a major issue, and one we have raised with EnergyCo since we were made aware of the project. What will happen if the impacts cannot be successfully mitigated? Do our communities just have to grin and bear it?

6. Again, only "feedback" will be sought from locals once the management plans are completed. All of these plans need to utilise the knowledge of the local, "boots on the ground" volunteers and landowners in the early planning stage to best understand the potential risks and constraints - working with the "relevant authorities" will not assist in protecting the immediate region. If EnergyCo had listened to the community the knowledge would have been gathered regarding local issues with the "governance" of our emergency services - ie. issues with RFS bureaucracy following the devastating Sir Ivan Bushfire which burnt in the area in 2017.

I don't think I can adequately express my disappointment in your lack of communication and execution of commitments to date - I know you've stated you understand my frustrations but I very much doubt that. I hoped ACERREZ might have been different to EnergyCo given the promises from ACERREZ Chief Executive, Trevor Armstrong, following the signing of the commitment deed as preferred network operator. He said "ACERREZ is absolutely committed to consulting the community as we work to deliver the project and it's very very important to us." He also went on to say "we want to make the community part of us because we're going to be there for 35 years and for us a community is really like our neighbour and we want to treat them exactly like how you'd treat your neighbour." I guess we should be used to hollow words and broken promises by now.

Jodie, I can only hope you took on your role of Community Engagement Manager with the best of intentions, but as with all of these roles within the "rapid transition to renewable energy" it is simply a case of trying to placate the angry villagers; tell them whatever you need to to shut them up. I, along with many others are well past being appeased given the complete disrespect and disregard we have been shown by EnergyCo concerning the CWO REZ as a whole, transmission project included. This process has devastated individuals, families and whole communities - something that is unlikely to be repaired in the foreseeable future. Throwing money at our region will not fix any of the issues we have with the transmission project - a lot of these issues are capacity related.

I only hope ACERREZ manages to find a way to treat landowners with empathy and respect and heeds the warnings of potential risks - they are the people that know the land better than anyone! I feel there will be a lot of "I told you so" moments to come..

Regards,
Emma

Department of Planning, Housing and Infrastructure

Overview

The Department of Planning is responsible for the assessment of State Significant Developments (SSD), State Significant Infrastructure (SSI) and Critical State Significant Infrastructure (CSSI) which includes large scale renewable energy infrastructure projects with a capital investment value of more than \$30 million.

Throughout the process of approval, a project Environmental Impact Statement must be exhibited for public comment, to which a response is provided by the applicant. I have found this process more of an editing and project enhancement service for the proponent to get their proposed project approved. The Response to Submissions documents often do not adequately address the issue raised (examples below), using other Government department guidelines or lack of conflict to demonstrate compliance – being a local landowner who knows the potential impacts better than anyone does not bear any weight. From the CWO REZ transmission project Response to Submission:

4.15.2 Aviation safety

Submission ID

47, 49, 62, 71, 147, 250, 323

Summary of issue

Seven submissions raised concerns about the impact of the project on aviation safety including concern about the impact on aerial firefighting efforts in proximity to the project.

Response

The transmission line and transmission line towers would not infringe any certified airports and are unlikely to impact take-off and landing operations at the Aircraft Landing Areas (ALA) assessed in proximity to the transmission line alignment. Establishment of the proposed transmission lines and towers would introduce a new obstacle into the airspace. However, additional transmission lines are unlikely to impact aviation safety as they would be published on aeronautical charts and advised to aviation stakeholders prior to construction.

Transmission lines would not prevent aerial firefighting activities from being carried out. Transmission lines are generally clearly visible from the air even when there's smoke. It is noted that the RFS assesses each fire operation on a complete set of conditions for each individual occasion.

Further, during exhibition of the EIS, feedback was received from Airservices Australia (the national service provider responsible for managing Australia's airspace), and the Civil Aviation Safety Authority (CASA) (the Government body that regulates aviation safety). Both bodies deemed the project acceptable from an aviation safety perspective subject to ongoing consultation through detailed design. This would include provision of a final project design for their review.

4.13.3 Agricultural land displacement

Submission ID

60, 65, 97, 100, 210, 274, 307, 310, 375

Summary of issue

Nine submissions commented on the economic impacts of the project due to the impacts on agricultural land. Comments included:

- the loss of agricultural land will result in negative impacts to the local economy including a reduction in employment opportunities and reduction in spending at local agricultural supply and service businesses. Should the project result in an increase in absentee farmers and a reduction in the local population, the local economy would suffer
- concerns the loss of agricultural land will result in wider implications for the local and national economy with the need to import more produce from abroad which would increase the cost of food.

Response

Construction of the project would result in a reduction in the land available for agricultural activity. The agricultural impacts of the project during construction are less than 0.2 per cent of agricultural economic activity in the region. The reduction in land available for agricultural activity during construction represents a conservative estimate, which assumes that the entire construction area would be unavailable for agricultural use during construction. Agricultural activities would generally be able to continue within the project area in accordance with the individual Property Management Plans, as detailed in mitigation measure AG3.

Following construction, the project would result in a smaller reduction in agricultural land due to the comparatively smaller operation area. A majority agricultural land within the amended operation area consists of transmission line easements, where land would continue to be used for grazing and other agricultural activities such as cropping, subject to easement conditions. As such any economic loss is expected to be relatively minor.

The agricultural impacts of the project during operation are less than 0.04 per cent of agricultural economic activity in the region and a fraction of the economic activity gains from the project. This is not anticipated to result in a significant reduction in employment opportunities and reduction in spending at local agricultural supply and service businesses. The project would create a small demand for regional labour resources and regional inputs to production. Consequently, no other effects on other industry sectors are anticipated during operation.

The projected loss of agricultural production due to the project is deemed negligible both regionally and nationally, with negligible implications for the long-term food supply of the region and the nation.

4.15.4 Impacts to telecommunications

Submission ID

32, 33, 52, 62, 63, 102, 160, 166, 169, 279, 286

Summary of issue

Eleven submissions raised concerns about disruption to telecommunication services in the region during both construction and operation of the project including:

- impacts to the telecommunications network during construction from the influx of a large construction workforce exacerbating existing mobile phone coverage
- the operation of high voltage transmission lines may disrupt mobile phone coverage, radio, Global Positioning Systems (GPS), internet and television reception.

Response

Construction impacts

A survey of existing mobile coverage in the vicinity of the project was completed, and based on that survey, a number of telecommunications solutions are being investigated that would both provide the coverage required during construction of the project. This would reduce the risk of decreasing coverage for the local communities as a result of the increase in the number of people in the area associated with construction of the project.

4.16.8 Oversized and overmass vehicle movements

Submission ID numbers

152, 251, 319, 363

Summary of issues

Four submissions commented on OSOM vehicle movements in the region from the project. Concerns about the suitability of the construction route, in particular the route to the workforce accommodation camps, and for OSOM vehicles along Denman Bridge and the main roads through Merriwa and Dunedoo.

Concerns were raised that the proposed Golden Highway OSOM route between Merriwa and Cassilis was too narrow and winding which would pose challenges for road users for overtaking.

Response

Construction of the project would require OSOM movements to the energy hubs and other locations across the construction area for the delivery of specialist electrical equipment and construction plant, materials and equipment. The number of OSOM vehicles for the project would be small and impacts to road users would be infrequent along the Golden Highway.

To facilitate these movements, appropriate travel permits for OSOM movements outside of pre-approved routes (i.e. 'last mile' sections) would be sought from the National Heavy Vehicle Regulator (NHVR). Road upgrades proposed for the project (see Section 4.16.7 above, and Chapter 3 of the Amendment Report) would also be designed with consideration for the largest vehicle proposed to be using the road.

The proposed generators within the Central-West Orana REZ will use common routes to transport OSOM components from the Port of Newcastle to the Central-West Orana REZ. Accordingly, the NSW Government has requested that EnergyCo identify and carry out required upgrades to a number of intersections along the State Road Network to facilitate the transportation of OSOM component, including consideration of Denman Bridge and main roads through Merriwa and Dunedoo. The Port to Central-West Orana REZ OSOM road infrastructure intersection upgrades project is, however, separate to the construction and operation of new electricity transmission infrastructure proposed as part of this project. Accordingly, assessment and approval of those works is outside the scope of this CSSI application. Further, this project is not reliant on the P2R road upgrades program of works which are a separate development and for a different purpose.

Generally, when granting approval or making a recommendation for SSD, SSI & CSSI developments, DPHI states that "on balance, the Department considers that the project is in the public interest and is approvable, subject to the recommended conditions of consent". I wonder if the "public interest" takes in to account those in the local area objecting to such projects? How many objections to a single project

is enough for the DPHI to refuse consent? Or what percentage of submissions objecting, compared to supporting, would cause the DPHI to consider a project not in the “public interest”?

I will use the Birriwa Solar project as an example. There were two exhibition periods in which the public could comment on the Birriwa Solar project (EIS & amendment). Throughout those two exhibition periods DPHI received 139 submissions – 131 objections and 8 comments, not one submission in support of the project! Yet, DPHI still deemed the project in the “public interest” and “approvable”. What the actual ****? Is this how a democracy works?

Issues & Errors/Inaccuracies

Not unlike EnergyCo and ACERZ, DPHI has had its fair share of faux pas and issues adequately addressing community concerns during the rollout of the “rapid transition to renewable energy”.

1. Changing notice of exhibition dates without notice – no one has time to check the portal every day, and a failure of the portal to update would mean it wasn’t apparent anyway. There was a very recent extension of exhibition for a project following which I made a suggestion to the planner that DPHI place an amended document rather than just “updating” the current notice of exhibition. Not a few hours later the following was visible:

Notice of Exhibition (2)



SSD-60074458 Notice of Exhibition

View

SSD-60074458 Exhibition -Notice of Extension

View

A simple solution to save confusion for the general public and one that was obviously very easy to implement.

2. Amendment of the legend on the “suitable areas for wind energy development” map contained in the Draft Wind Energy Guideline without notice nor explanation.
3. A fairly constant change of DPHI planners assigned to infrastructure projects – is continuity of project consultation important to any Government department?
4. A lack of communication from some DPHI staff – I waited four months, and followed up countless times with numerous staff, for answers to what I thought were fairly straight forward questions of the planners specific to three different projects, all of which were still rolling through the assessment process while I was waiting for a response.
5. Request for Additional Information (RFI) documents either not responded to or not made available on the portal.

Department of Planning, Housing and Infrastructure



Our ref: Valley of the Winds Wind Farm (SSD-10461)

Mr Craig Theron
Project Developer
ACEN Australia
By email: craig.theron@acenrenewables.com.au
14/06/2024

Subject: Request for Additional Information

Dear Mr Theron,

I refer to the assessment for the Valley of the Winds Wind Farm (SSD-10461). After careful consideration, the Department is requesting that you provide additional information:

- **Transport:** schedule of road upgrades agreed to with the relevant road authority;
- **Biodiversity:** a response to matters raised by the Biodiversity, Conservation and Science Group (BCSG) in their advice dated 7 June 2024;
- **Aviation:** additional assessment of aviation impacts on nearby airstrips, including:
 - the potential for wake turbulence generated by wind turbines; and
 - consideration of wind turbines as potential obstacles to take-off and landing; and
- **Landowner's consent:** landowner's consent from Crown Lands.

You are requested to provide the information to the Department by 1 July 2024. If you cannot meet this deadline or do not intend to provide the additional information, please advise the Department via the NSW planning portal.

The assessment period ceases to run between the date of this letter and the date you provide the additional information (or notification that the information will not be provided), in accordance with Part 4 Division 4 of the *Environmental Planning and Assessment Regulation 2021*.

If you have any questions, please contact Nicola Bremer on 1300 010 100 or email at nicola.bremer@dpw.nsw.gov.au

Yours sincerely,

Yours sincerely,

Nicola Bremer
Director
Energy Assessments

Note the example to the left. DPHI requested additional information on 14th June 2024 and stated that ACEN should provide the information by 1st July 2024. There has been no update to these documents so one can only surmise that either ACEN did not provide the requested information, or DPHI has not uploaded it to the portal. I note that upon questioning regarding why an RFI request had not been responded to within the allotted time frame given, a DPHI staff member stated that “the Applicant required more time to address the RFI items.” There have not been many cases, to my knowledge, of the general public being granted extra time to submit their documents during an EIS exhibition period – is that fair?

6. During an on-site meeting with a DPHI Director of Energy Assessments, and two other DPHI staff, the Director stated that he would most likely be approving the neighbouring solar project (the one we were meeting to discuss – a meeting DPHI had requested) within the next month, before even hearing the neighbouring landowners' concerns – is that due diligence and/or a sign of good process?
7. While travelling to the aforementioned on-site meeting the Department of Planning Staff drove through a private property access road. When this matter was raised the staff naturally apologised but it evidenced the point that renewable energy project workforce
8. Calculation errors in Birriwa Solar Assessment Report, admitted by Iwan Davies, Director Energy Assessments, after being brought to light by a member of the public during an IPCn meeting. How many errors are there in other documents that have not been discovered? Would the DPHI have admitted the errors if they had not been unearthed by a community member?

MR DAVIES: Thank you Chair. There are three questions that I do want to address that were raised by the community today. So thanks everyone for their input. There are questions from Sally Edwards and Emma Bowman. The first, and the clarify, both Sally and Emma asked about the figure stated in the Department's assessment report regarding the comparison between the project and agricultural land in the central west around the region, including the 8.9 million hectares stated. That is the 1,200 hectares development footprint representing the 0.01%.

So that 8.9 million hectares was obtained from a New South Wales government commissioned report in 2016. I don't think that is a confidential document, and I'm happy to providing a link to that, if not. And Emma Bowman quite rightly pointed out, or I suppose Emma questioned the 8.9 million as well. I do want to make a correction in our assessment report. We stated 8.9 million within the CWO REZ. It's 8.9 million within the Central-West Orana region, not only the renewable energy zone.

Left: from the transcript of the Birriwa Solar IPCn meeting held in Dunedoo on Wednesday 5th June 2024.

NSW Major Projects Planning Portal

As can be seen in my correspondence with DPHI there have been multiple issues with the NSW Major Projects Planning Portal during the time I have had an account. There are often issues with the Portal not updating (I have been informed that clearing ones browser history and cookies will resolve the issue but that is not always successful). It has also been reported that members of the public have spent a lot of time writing a submission on the Portal only to have the webpage refresh and lose their submission and the Portal has been known to crash when submissions are due for large scale renewable energy infrastructure projects causing much angst and frustration. If this is the process used to receive submissions for such projects it must be upgraded so there are not instances when comments from the general public go unheard due to technical issues. There is also no way to sort submissions into which exhibition period they were received for projects that issue amendments.

Renewable Energy Planning Framework

According to the NSW Government's Planning website, "The Renewable Energy Planning Framework has been developed to help NSW transition to renewable energy. It includes guidelines for wind and solar energy generation and transmission infrastructure. It will support the industry by providing more investment certainty and will also make sure that communities benefit from the renewable energy projects they're hosting."

The Renewable Energy Planning Framework is designed to:

- make sure development is guided by meaningful consultation with communities, and that there is more transparency and clarity about where and how development happens
- make sure the benefits of energy development are directly realised by the communities and regions that host the infrastructure
- introduce clear setbacks to avoid significant visual impacts from wind energy and transmission infrastructure and to set clear expectations for the industry
- provide greater support to applicants and landowners entering into agreements to host infrastructure or manage the impacts of development
- provide more transparency about the likely costs of decommissioning solar and wind energy development so the industry and landowners can make more informed investment decisions
- provide guidance for identifying, assessing, avoiding, and mitigating impacts from renewable energy development
- help the industry to make informed investment decisions by providing more objective development standards
- streamline the planning process by supporting faster and more consistent decisions
- ensure the level of assessment matches the level of risk to help speed up the assessment process.

Exhibition and consultation for the framework

The framework has been developed based on extensive consultation and feedback received through the public exhibition of the [draft energy policy framework](#), held from 14 November 2023 to 29 January 2024. Approximately 400 written submissions were received during this period.

In addition to written submissions, we heard from government agencies and departments, industry, councils, peak bodies and organisations, and community groups and members at various information sessions and forums online and in Renewable Energy Zones.

A range of changes have been made to address comments and concerns including amendments to the visual impact assessment process, inclusion of additional guidance on benefit sharing and more. Read more about the key themes of consultation and actions being taken by the NSW Government in the [Renewable Energy Transition Update](#).

Whilst I have not had the time to go through the documents so cannot comment on their adequacy and DPHI's use of public feedback I did check in regarding the CSSI declaration.

From the Draft Wind Energy Guideline:

2.6 Critical state significant infrastructure

The Minister may declare development to be Critical State Significant Infrastructure (CSSI) under section 5.13 of the EP&A Act if it is considered essential to the State for economic, environmental, or social reasons. The department's [Declaration of SSI and CSSI](#) guideline sets out the general principles and reasons for the Minister to declare development as CSSI. The Minister will consider requests to declare wind energy development to be CSSI if it includes a significant energy storage system (for example, a delivery capacity of 750 megawatts or more).

While the assessment process is generally the same as SSD, there are few key differences. The Minister is the determining authority for all CSSI decisions and cannot delegate this function. Additionally, landowners' consent is not required for CSSI applications, and a decision made cannot be subject to judicial review (a review of the administrative decisions and conduct) by the Land and Environment Court unless approved by the Minister. The process is explained in more detail in the Department's [State Significant Infrastructure Guidelines](#).

I am extremely concerned that the above conditions regarding wind and solar projects potentially being declared Critical State Significant Infrastructure will remove all landowner rights to say no if they are not interested in "hosting" large scale renewable energy infrastructure. During consultation regarding the Draft Energy Policy Framework in Coolah at the end of November 2023, DPHI staff assured the community members in attendance that would not be the case.

The Wind Energy Guideline was released in November 2024 and contains the following:

A critical State significant infrastructure application or approval does not allow the applicant to compulsorily acquire land. Compulsory acquisition is a process undertaken only by an authority of the state under the *NSW Land Acquisition (Just Terms Compensation) Act 1991*. It also does not allow the applicant to construct or operate a project without the consent of the landowner.

It is my understanding that while an applicant is not permitted to construct or operate a project without landowner consent there is no condition preventing the applicant from designing a project on land without landowner consent – is that acceptable? The above also states that a renewable energy developer will not be authorised to compulsorily acquire land – I wonder how long before a statutory authority like EnergyCo becomes the proponent of such infrastructure projects if there are not enough willing “hosts”?

The below map was sourced from the Draft Wind Energy Guideline:

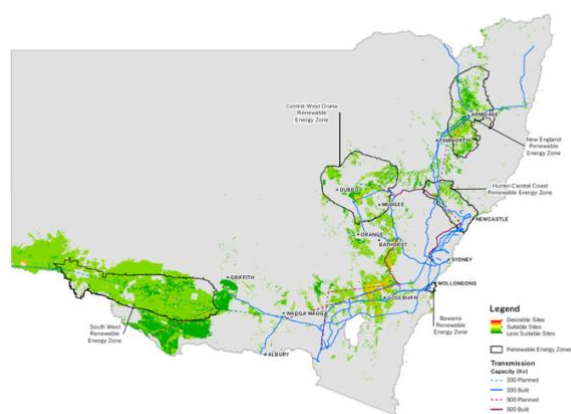


Figure 3 - Suitable areas for wind energy development

Draft Wind Energy Guideline | 21

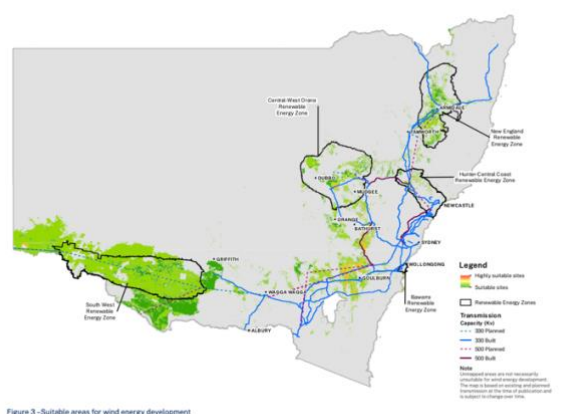


Figure 3 - Suitable areas for wind energy development

Draft Wind Energy Guideline | 21

The map on the left was originally released in the guideline document. The one on the right was the second iteration, made without notice, at least until it was observed and reported by members of the public. You will see that whilst the map doesn't appear to have changed, the legend descriptions have been modified from “desirable sites”, “suitable sites” and “less desirable sites” to “highly suitable sites” and “suitable sites”. The subject arises again, is it acceptable that Government documents are changed without communication or explanation, especially those that are exhibited for public comment?

Draft Energy Policy Framework Submission (submitted to DPHI online 29th January 2024)

I am a fifth generation Dunedoo district farmer and I have many concerns regarding the “rapid transition to renewables” including but not limited to, land use conflict, bushfire risk and firefighting limitations, roads and transport, visual amenity and noise, community division and water use.

In November 2021, my property, unknowingly and unwillingly, became part of the Central West Orana Renewable Energy Zone (CWO REZ). This declaration was made without consulting those it has gone on to affect the most, farmers and rural and regional Australians. The cumulative impacts on communities within the five REZ's in NSW will be extensive and have the potential to severely limit our farmers capacity to feed the nation.

Whilst the Wind and Solar Guidelines will possibly go some way to limiting the effects of large scale renewable energy generation projects on rural and regional NSW I do not believe they are comprehensive enough to protect farmers and landowners who will likely be most affected. Is this enormous infrastructure really required to power the nation in the future? Were there other options investigated that could make use of existing infrastructure and include small scale renewable energy projects that would not have such devastating effects on our most valuable food and fibre producing regions (ie. community owned and run solar systems or subsidies and incentives for solar on every roof and batteries in every garage)? Why does rural and regional NSW, and Australia have to bear the burden of energy generation into the future for the whole state and country?

A big focus of these guidelines is ensuring renewable energy generation projects are approved more quickly. I believe this will be to the detriment of the whole population as due diligence and common sense will be lost in the “fast” transition. Community consultation has already shown to be lacking, what will a more hasty process mean for locals who would like to have their opinions considered and landowners who know their country better than anyone?

Draft Wind Energy Guideline

Firstly, I would like to convey my extreme disappointment and disapproval at the “suitable areas for wind energy development” map being changed without any transparency. It seems the only reason there is now a statement on the website is the feedback provided by those who noticed the unadvertised switch. This statement does not adequately explain why the changes occurred.

Impacts on Agricultural Land, Wildlife & Habitat

Whilst the impacts on agricultural land for wind developments are not as all-encompassing as solar there are still many risks. Removal of trees is not only eliminating wildlife habitat but has the potential to cause erosion in many areas due to the usual terrain suitable for wind turbines. There will also be implications post decommissioning considering the concrete pads are to be left in situ; this means trees will not be able to grow in these areas. Better decommissioning rules should be put in place for wind projects.

Local knowledge

Local knowledge needs to be considered more heavily. There are many “experts” engaged to consult on various aspects of wind projects during the planning and approval stages. The vast majority of these “experts” are not local, nor living day to day life in the field they are assessing. During preliminary consultation local landowners and community members should be engaged to provide information about many potential impacts instead of relying on “experts” who are “educated” in the appropriate field. This should also apply to solar projects.

Community & Stakeholder Engagement

The document states that “effective community and stakeholder engagement is essential for the development of the wind energy industry and the environmental assessment process” and “applicants must undertake meaningful engagement with stakeholders throughout the environmental impact assessment process and during the construction, operation and decommissioning phases of the project”. What constitutes “effective” and “meaningful” engagement? Is it consulting 50% of the affected population, or 30%, and asking them for and listening to their opinions, or is it just holding drop in sessions in any community deemed affected and ticking that box regardless of how many community members participate?

Community consultation fatigue is a major problem in the CWO REZ; I can only assume the same will happen in the other REZ’s in NSW. It is difficult to keep up with which project is where and who owns what when there are 48 projects operating, under construction and proposed in the district. I believe proponents should work together to better manage community engagement practises in an attempt to save the community UNPAID time. This is time away from our small businesses and families when all the developers’ employees are paid.

The above also applies to all renewable energy related projects.

Biosecurity

There needs to be much more stringent measures placed on biosecurity risks. The spread of noxious weeds and animal diseases have the potential to devastate agricultural areas. Who will be responsible for assuring compliance by proponents, and contactors, in relation to any biosecurity measures implemented? And who will be responsible if there is a spread of weeds or an animal disease that can be attributed to a certain project or projects?

The same applies for solar projects.

Visual & Noise Impacts

As with all potential impacts from wind installations, visual and noise impacts are assessed by “experts” who do not and will not live in the affected area. It’s very easy to consider impacts “minor” or “negligible” when you don’t personally have to live with the consequences.

The Technical Supplement for Landscape and Visual Impact Assessment states “almost all wind energy developments are comprised of similar infrastructure that exhibit common characteristics including colour, texture, movement and contrast with the rural landscapes in which they are typically located.” Where in rural or regional NSW are there structures as large or imposing as wind turbines? This comment goes to show that those assessing visual impacts are out of touch with the reality of the rural landscape!

It is stated that there is an exposure limit of 30 hours per year of shadow flicker. As a sufferer of chronic migraines I would suggest that 1 hour would be too much for anyone with neurological issues. When is a medical situation taken into account by a renewable energy project developer?

Similar could be said for noise generated by wind turbines. Whilst “experts” might agree that the noise emitted is not significant I believe those who are most affected by that noise would disagree.

Again, those most affected should be added to the list of “experts” engaged to assess the projects merits and impacts.

There is often mention of “visual screening” to mitigate visual impacts from non associated dwellings. Considering the growing time of most vegetation I suggest that any plantings must be in place 20 years prior to project construction, or mature trees should be planted. In both cases the proponent should be responsible for caring for the trees and replacing any as needed.

Visual impacts should not only be considered from dwellings. Most farmers spend more time in the paddock than their homes. We currently have very picturesque landscapes whilst we work. Changing that to an industrial landscape will be a huge adjustment and should be taken into consideration.

Critical State Significant Infrastructure

The draft wind energy guideline states “the Minister may declare development to be Critical State Significant Infrastructure (CSSI) under section 5.13 of EP&A Act if it is considered essential to the State for economic, environmental or social reasons.” I wholeheartedly object to wind, or any renewable energy development, being declared CSSI as the landowners consent is not required for this type of application. This would effectively take away landowner property rights!

Benefit Sharing

The amount of money recouped by renewable energy developers through large scale energy generation certificates, a scheme created by the Federal Government as part of the Renewable Energy Target to promote renewable energy generation, is such that the benefits shared with communities “hosting” the projects should be much more significant.

Compliance

Who is responsible for policing conditions of consent or any other restrictions placed on wind developments? Neighbouring landowners and other community members should not have this burden placed on them. There should be DPHI staff on site at each project to monitor compliance.

Draft Transmission Guideline

Agricultural Land Use

The draft guideline states “agricultural land can continue to support grazing and cropping uses adjacent to and underneath transmission lines. For this reason, the cumulative risks and impacts to agricultural land and productivity due to transmission infrastructure are typically very low.” Again, the assessment is carried out by those who are not directly impacted. The real life impacts on agriculture are shown when farmers cannot fit their machinery under transmission lines proposed to split the property in half, effectively limiting the activities the landowner can carry out on his/her land!

Any proposed transmission projects should be carried out with transparency and honesty, engaging compassionately with affected landowners throughout the whole process. The bullying and disrespect shown by EnergyCo during the “consultation” for the CWO REZ transmission project has been nothing but disgusting! This should not ever happen – but I understand even with the feedback already given EnergyCo is continuing to use the same tactics with the projects that will follow the CWO REZ transmission project ie. Hunter Transmission.

Bushfire Risk

Whilst it is stated that “when planned and maintained properly, high voltage overhead transmission lines do not pose a risk of igniting bushfires” that does not account for a fire ignited by other means. The guideline also says that “in the event of a bushfire, transmission lines can be quickly shut down for safety reasons. This greatly reduces the risk of fire spreading and causing significant damage to infrastructure and also allows on-ground and aerial firefighting activities to be carried out with significantly less risk.” In a major bushfire event, like the one that burnt a large proportion of the proposed CWO REZ transmission route in 1979 or the Sir Ivan Bushfire that burnt 55,000ha of mostly

farmland in the Dunedoo/Coolah district in 2017, I do not believe RFS crews will not be permitted on the ground or in the air in the vicinity of major infrastructure (especially transmission lines close to wind turbines or a solar project). If our district is left without aerial assistance during major bushfires we will have more instances of severe fires like Sir Ivan! Who, as always, will be left to clean up the mess?

Solar Energy Guideline Update

Impacts on Agricultural Land

Land use conflict is a major issue when considering large scale solar developments. While there is an opportunity for sheep to graze under solar panel installations, I do not believe this is a long term solution and there has not been enough research done into possible negative effects on the livestock. It is my understanding that some sheep have perished under solar arrays due to lack of airflow in periods of extreme heat. I also have doubts about the long term grazing possibility given the lack of opportunity to improve soil and therefore grow nutrient rich feed to sustain sheep under solar panels. I have been informed that sheep have been known to chew wires, turn off emergency switches (stopping energy production) and climb on panels (breaking them). I do not imagine any of these things are conducive to effective energy generation.

During construction of solar projects contour banks, dams and trees are removed. Whilst dams and contour banks can be reinstated relatively quickly, shade trees, used to provide shelter from the elements for livestock will take at least 30 years to establish. This suggests to me that any land taken out of production for a solar installation will not be able to be fully functional for agriculture for 60 years post construction (assuming a project would be utilised for 30 years).

How will Australian farmers feed the growing population with less agricultural land available?

Planning Framework

As mentioned above I do not believe solar developments should ever be declared Critical State Significant Infrastructure (CSSI) by the Minister.

Site Selection

The “suitable locations for solar development” map engulfs the NSW food bowl; this is some of the most productive land in the state, and country. I understand this map does not mean the whole area will be built out with solar developments but the number of installations already operating, under construction and proposed will place more pressure on food and fibre production.

Benefit Sharing

The amount of money recouped by renewable energy developers through large scale energy generation certificates, a scheme created by the Federal Government as part of the Renewable Energy Target to promote renewable energy generation, is such that the benefits shared with communities “hosting” the projects should be much more generous.

Compliance

As above in the wind guideline comments.

Draft Benefit Sharing Guideline

The benefit sharing guideline needs to consider Councils that lack the capability and capacity to properly deliver community benefits. It also needs to better account for neighbours and communities that bear the brunt of the potential impacts of the proposed project.

Draft Private Agreement Guideline

There is a lot of disparity from developer to developer and even landowner to landowner within the same development. There has been a lot of “divide and conquer” tactics used with both private developers and public authorities. Landowners need to be better protected and developers and public authorities need to have regulations (not just guidelines/recommendations) around how they must engage with landowners. Any discussions should be open and transparent with all involved landowners negating the need for confidentiality clauses. While different properties have different implications and landowners have different priorities there needs to be an adequate starting point that satisfactorily protects landowners.

General Comments

There are a lot of references to “should”, “consideration” and “encourages” suggesting the guidelines are recommendations not enforceable requirements. I believe these guidelines should be used to protect rural and regional NSW, landowners and communities from the “rapid transition to renewable energy” and therefore should be must more rigid.

Most renewable energy proposals advertise “number of homes powered by the project”. After researching a considerable number of projects I have come to realise these figures are neither consistent, nor realistic. My property is solely powered by solar energy so I have come to understand the benefits and limitations of this sort of installation. Is there an industry standard for the above calculation? Does it allow for powering homes 24 hours, 7 days a week, or only when the renewable energy project is producing power at its peak?

A minimum set back from neighbouring landowners boundaries should be set for all renewable energy projects – wind, solar, BESS, transmission and pumped hydro. Whilst not all hazard risks can be confined to the property “hosting” infrastructure every possible measure should be taken to limit risks to neighbours and the greater community. For instance, wind turbines should be set back so in the case of blade throw or a fallen turbine there is no impact to the neighbouring property.

Insurance liability is something that isn’t openly discussed with affected communities. This is liability for “hosts”, neighbours and the general population. For instance, as a landowner I have public liability insurance – what happens if I accidentally started a fire that spread into a project that is worth 100 times my policy value? This is a very contentious issue that hasn’t been answered by any proponents to date. What is the timeline for implementation of these guidelines? There are many projects in the CWO REZ already preparing EIS’s, will they be subject to these changes?

All EIS’s I have read are missing a lot of detail that is said to be left to “detailed design”, “further refinement” or “post development consent”. I believe there needs to be more restrictions around what community members will not have a chance to comment on. It is not fair that in many cases there is no feedback sought for where water will be sourced, what roadworks will be completed etc.

The required minimum period for EIS exhibitions is currently too short. Proponents have years to prepare the documents but we, the community, are given 28 days to read and respond. In the case of the CWO REZ transmission EIS documents totalled over 7900 pages. To find anyone who had the capacity to read all of that information, whilst also working full time, would be nigh impossible. It is only fair that the EIS exhibition period minimum should be extended to 12 weeks to give the community most affected a decent opportunity to respond to any issues; especially for those communities being bombarded with multiple projects.

Due to the overwhelming amount of research, reading and submissions I have partaken in over the last 6 months I have not had an adequate amount of time to fully read and respond to all of the documents provided in the draft energy policy framework. We are being bombarded with legislation, policy and project proposals due to the “rapid transition to renewable energy”. Would it not be better to have balanced and thorough investigation into the potential impacts of the transition, or even other possible options to large scale renewable energy projects, rather than rushing into the current plan?

Emma Bowman

Correspondence

From: Emma Bowman
Subject: LUCRA
Date: 17 January 2024 at 11:03:54 am AEDT
To: Iwan Davies

Good morning Iwan,

Just a quick question. I am currently reading through the LUCRA which is part of the Birriwa Amendment RTS. Can you please explain to me why the LUCRA has only been done on the accommodation facility, not the whole project?

Also, as an example, I see that “increased distribution of weeds during construction” has a “likely” probability but the consequence is considered “minor”. How are the consequence rankings calculated?

Regards,
Emma

From: Emma Bowman
Subject: Liverpool Range Wind project
Date: 15 February 2024 at 9:58:56 pm AEDT
To:

Dear Kurtis,

Is there a way to sort submissions on the major project portal so it is clear which submissions are applicable to which amendment?

Regards,
Emma Bowman

From: Emma Bowman
Subject: Lack of response to emails
Date: 20 February 2024 at 2:54:41 pm AEDT
To:
Cc: Iwan Davies ,

Hi Clay,

I’m not sure who best to raise this issue with but I’ll let you determine if it is something you can help me with.

Please find two emails below to DPHI staff that are still awaiting a response. The most recent being sent to Kurtis Wathen on 15th February, the second was sent to Iwan Davies on 17th January (please note the error I made in the email should read weeds, not weeks). While I appreciate DPHI staff receive a lot of emails I would assume it is best practise to respond in a timely manner.

Regards,
Emma

From: Emma Bowman
Subject: Fwd: Lack of response to emails
Date: 5 April 2024 at 11:08:46 AM AEDT
To:

Hi again Nicole,

I wonder if my request below of Clay is something you can help me with?

Iwan did try to ring me on March 8th but I was unavailable and attempted to ring him back the next day. I have not heard anything from him since.

The other issue I am having trouble with is proponents identifying sources of water for project construction and operation without agreements in place with the water license holder. How is it possible for a project to stipulate a water source in an EIS, Amendment or Response to Submissions without a signed agreement in place? Water is a very valuable resource within rural and regional NSW and it is my belief that a project should not be assessed and most certainly not approved by DPHI without concrete plans in place regarding water use and sources.

Kind regards,
Emma

From: Emma Bowman
Sent: Monday, 13 May 2024 9:54 AM
To: Iwan Davies
Subject: Fwd: Lack of response to emails

Good morning Iwan,

Given it has now been another month since you last tried to call me (and I attempted to reach you by phone), I can only imagine given the timing of that call following my email below to Nicole, to address the issues raised via email to yourself and other DPHI staff that are still awaiting a response - one even after 4 months!

Considering the issues we have had connecting via phone could you please address the issues below via email at your earliest convenience. The matters I have raised are important and it does not instil confidence in the process when DPHI staff fail to address concerns of the general public.

Following this email I will forward you another that has yet to be responded to by a DPHI staff member.

I would appreciate a prompt reply given that assessment is no doubt continuing on the projects I am concerned about.

Regards,
Emma

From: Iwan Davies
Subject: RE: Lack of response to emails
Date: 13 May 2024 at 11:15:06 AM AEST
To: Emma Bowman

Hi Emma,

Thank you for your emails.

I will discuss with the team what correspondence we have yet to respond to you on across all project types at our Team Meeting tomorrow and I will be back in touch.

Regards

Iwan

Iwan Davies

Director, Energy Assessments

Planning and Assessment

Department of Planning, Housing and Infrastructure

dphi.nsw.gov.au

4 Parramatta Square, 12 Darcy Street Parramatta NSW 2150

Locked Bag 5022, Parramatta NSW 2124

From: Emma Bowman

Subject: Re: Lack of response to emails

Date: 17 May 2024 at 2:17:11 PM AEST

To: Iwan Davies

Iwan,

Just checking in to see how you went at the team meeting on Tuesday and if you have some answers regarding my previously forwarded questions?

Regards,

Emma

From: Emma Bowman

Sent: Thursday, 23 May 2024 8:33 PM

To: Iwan Davies

Subject: Fwd: Lack of response to emails

Iwan,

Yet another week has passed by without response.

I wonder that if community members can not be afforded adequate, timely advice, answers and information from DPHI how we can be assured the renewable energy projects being enquired about are sufficiently assessed or developers being held to a higher standard than DPHI can meet?

I cannot express enough disappointment to relay to you how I feel about the process thus far. Whilst community members are delayed by "inefficient process" projects continue to be assessed and approved. This is unacceptable!

Regards,

Emma

On 26 May 2024, at 1:03 PM, Iwan Davies

wrote:

Hi Emma,

Thank you for your email and I apologise for the late response.

That's correct, I raised all correspondence from you with the broader Energy Assessments team last week. The team has confirmed that it is considering your correspondence for the projects you have submitted comments or submissions on (including Wind Farms and Solar Farms).

Regarding Solar and BESS projects, I appreciate we have played a lot of phone tag, but also understand that my colleague Nestor Tsambos has spoken with you recently regarding the Birriwa Solar Farm. I also understand that a response to your formal letter has been sent to you or is in the process of being sent.

I am available at the following times on Monday, Tuesday and Friday this week. Please feel free to call me during these times, or I would be happy to arrange a 'face-to-face' Microsoft Teams meeting to discuss Solar & BESS projects with you:

Monday:

- 11.30 – 12.00
- 12.30 – 13.00
- 13.30 – 14.00

Tuesday:

- 11.00 – 11.30
- 12.30 – 13.30

Friday:

- 9.30 – 10.00
- 10.30 – 11.30

Thanks

Iwan

From: Emma Bowman

Sent: Sunday, 26 May 2024 9:04 PM

To: Iwan Davies

Cc: Clay Preshaw

Subject: Re: Lack of response to emails

Iwan,

I am not available this week for a phone conversation due to prior commitments so would appreciate it if, as I previously requested, you could respond to my queries raised in the below email, and the second email I forwarded you on Monday 13th May, via email ASAP. These are not 'comments' or 'submissions' but genuine enquiries that I believe require a response. As I have already stated projects are being assessed, and approved in the case of Birriwa Solar, prior to community concerns being addressed by DPHI; I do not believe this would be deemed "best practice".

Nestor Tsambos and I discussed the water issue I raised with Nicole Brewer in a below email - I would also like a response to that query in writing.

I would appreciate a prompt response to these matters.

Regards,
Emma

On 27 May 2024, at 2:23 PM, Iwan Davies

wrote:

Hi Emma,

Thank you for the below.

The team will prepare a response to your enquiries and this will be sent to you this week.

Separately, confirming that the broader Energy Assessments team is aware of your emails and enquiries and has considered these in its assessment of energy projects, including Birriwa Solar Farm.

In addition to the team's written response I am happy to schedule a meeting should you wish, but appreciate you have a busy schedule.

Regards
Iwan

From: Emma Bowman
Sent: Friday, 31 May 2024 9:56 AM
To: Iwan Davies
Cc: Clay Preshaw
Subject: Re: Lack of response to emails

Iwan,

Just a reminder that I expect to see a reply to all of my queries in my inbox by close of business today. I believe I have been more than patient waiting for these questions to be answered.

Regards,
Emma

From: Iwan Davies
Subject: RE: Lack of response to emails
Date: 31 May 2024 at 9:57:31 AM AEST
To: Emma Bowman
Cc: Clay Preshaw

Hi Emma,

Yes, the team is finalising its response.

Thanks
Iwan

From: Nestor Tsambos

Subject: Response to queries - Birriwa Solar Farm

Date: 31 May 2024 at 1:46:57 PM AEST

To:

Cc: Cameron Ashe

, Iwan Davies

Good Afternoon Emma,

Regarding your query around the Land Use Compatibility Risk Assessment for the Birriwa Solar Project:

I can advise that a Land Use Compatibility Risk Assessment (LUCRA) was submitted as part of the Environmental Impact Statement for the original development application of the Birriwa Solar Farm project. This was a requirement of the Secretary's Environmental Assessment Requirements (SEARs) for the project. This was publicly exhibited along with all other relevant project documents between 14 October and 10 November 2022.

The project was subsequently amended to include a workers accommodation facility where an additional LUCRA was undertaken as part of the amendment report. The amended report and supporting documents were publicly exhibited between 6 October and 19 October 2023.

Both the original LUCRA and the additional LUCRA are available for viewing on Major Projects on the NSW Planning Portal at: www.planningportal.nsw.gov.au/major-projects/projects/birriwa-solar-farm.

In terms of how the LUCRA consequence ratings are calculated, [the Large Scale Solar Guideline](#) sets out LUCRA Assessment requirements.

Regarding your query on water sources for Birriwa Solar Project:

- The Water Group within NSW Department of Climate Change, Energy, the Environment and Water provided advice during the exhibition of the project and in response to ACEN's amendment submissions report recommending that ACEN demonstrate water demand and water sources capable of meeting project demands.
- In response, ACEN provided entitlement details of existing Water Access Licences (WALs) which may be used to supply the project, including engaging with the owners of those WALs to confirm they are open to entering into an agreement with ACEN to secure water supply for the project.
- Details of this are included in the RFI response from ACEN dated 21st of March, available on the NSW planning portal.
- The Department's consideration of water impacts is included in Section 5.6 of the Assessment Report.

Regarding the ability to separate submissions between amendment exhibition and original exhibition phase, unfortunately the NSW Planning Portal does not have that functionality at this stage.

Kind regards

Nestor Tsambos

Team Leader

Energy Assessments

Department of Planning, Housing and Infrastructure

-----Original Message-----

From: Emma Bowman

Sent: Friday, 3 May 2024 4:06 PM

To: Ellena Tsanidis

Subject: RTS Burrendong Wind

Hi Ellena,

Would you please be able to advise me on the process to follow if I don't believe the proponent of Burrendong Wind, Ark Energy, have adequately addressed, in the Response to Submission, the concerns I raised in my submission?

Kind regards,

Emma Bowman

From: Ellena Tsanidis

Subject: RE: RTS Burrendong Wind

Date: 7 May 2024 at 2:52:46 PM AEST

To: Emma Bowman

Hi Emma,

Sorry for the delay in getting back to you on this.

While there is no further exhibition period following receipt of the Submissions Report, the Department will consider any pertinent information provided after the formal exhibition period as part of our assessment.

Please feel free to email your concerns through to me, which the team will consider as part of the merit assessment of the application.

Additionally, once the Department completes its assessment, the project will be referred to the Independent Planning Commission (IPC) for determination. It is likely the IPC will hold a public meeting and the community will have another opportunity to comment before a final decision is made.

Kind regards,

Ellena Tsanidis

Environmental Assessment Officer

Energy Assessments | Department of Planning, Housing and Infrastructure

-----Original Message-----

From: Emma Bowman

Sent: Friday, 5 April 2024 11:30 AM

To: Jess Watson

Subject: Spicers Creek Wind project RFI

Hi Jess,

Could you please advise where I can find the response from Squadron Energy - Spicers Creek Wind, to the most recent Request for Additional Information made by Nicole Brewer on 8th March 2024?

Kind regards,
Emma Bowman

On 9 Apr 2024, at 4:49 pm, Jess Watson wrote:

Hi Emma,

Thank you for your email. The Applicant is currently preparing their response to the Department's request for information. It will be made publicly available on the Major Projects Website when submitted.

Kind regards,

Jess Watson
Planning Officer

Energy Assessments | Department of Planning, Housing and Infrastructure

www.dphi.nsw.gov.au

From: Emma Bowman
Sent: Tuesday, 9 April 2024 7:53 PM
To: Jess Watson
Subject: Re: Spicers Creek Wind project RFI

Thanks for the reply Jess.

May I ask why the proponent hasn't had to submit the information by the due date of 22nd March 2024?

Kind regards,
Emma

From: Jess Watson
Subject: RE: Spicers Creek Wind project RFI
Date: 12 April 2024 at 9:20:03 AM AEST
To: Emma Bowman

Hi Emma,

The Applicant required more time to address the RFI items.

Kind regards,

Jess Watson
Planning Officer

Energy Assessments | Department of Planning, Housing and Infrastructure

www.dpie.nsw.gov.au

From: Emma Bowman
Subject: Re: Spicers Creek Wind project RFI
Date: 17 April 2024 at 12:18:08 PM AEST
To: Jess Watson

Hi Jess,

Does an applicant have to provide specific reasons for not adhering to deadlines, or is the requirement of “more time” generally acceptable to the Department?

I only ask as community members have regularly requested more time from DPPI to make submissions to project EIS's and amendment reports without success? I do not believe it is fair that a renewable energy proponent can simply request more time when they are struggling to meet deadlines if the same rules do not apply for members of the public attempting to respond to multiple documents at one time.

Kind regards,
Emma

-----Original Message-----

From: Emma Bowman
Sent: Monday, 11 March 2024 12:56 PM
To: Natasha Homsey
Subject: CWO REZ transmission

Hi Natasha,

Once again the planning portal is not updating to show the response to submission or the preferred infrastructure report for the CWO REZ transmission project. I have cleared my browsing history and tried to access the reports on several different browsers.

THIS IS NOT ACCEPTABLE!!

Emma Bowman

From: Natasha Homsey
Subject: RE: CWO REZ transmission
Date: 11 March 2024 at 2:43:52 PM AEDT
To: Emma Bowman

Good afternoon Emma,

Both the Submissions Report, and Amendment Report are available on the Department's website, under the 'Response to Submissions' and 'Amendments' headings respectively:

<https://www.planningportal.nsw.gov.au/major-projects/projects/central-west-orana-rez-transmission>

Please let me know if you have any further questions.

Kind Regards,

Natasha Homsey

Team Leader, Energy Assessments

Energy, Resources and Industry Assessments

Department of Planning, Housing and Infrastructure

From: Emma Bowman

Sent: Monday, 11 March 2024 2:47 PM

To: Natasha Homsey

Subject: Re: CWO REZ transmission

Hi Natasha,

I know where to find the documents, and after an hour and a half have managed to get the portal to update on my computer so I can view the documents. You will be aware this is not the first time I have contacted the Department regarding issues with the portal updating. When will something be done to rectify all the issues caused by the Planning Portal?

Regards,

Emma

From: Natasha Homsey

Subject: RE: CWO REZ transmission

Date: 11 March 2024 at 3:50:30 PM AEDT

To: Emma Bowman

Hi Emma,

Thank you for your email.

When we accept documents in the portal at various stages of the assessment process there is a finite time it takes for the website to sync and to reflect these documents, which is what happened in this instance.

Please let me know if you have further questions.

Kind Regards,

Natasha Homsey

Team Leader, Energy Assessments

Energy, Resources and Industry Assessments

-----Original Message-----

From: Emma Bowman

Sent: Thursday, 16 November 2023 3:31 PM

To: Natasha Homsey

Cc: Nicole Brewer

Subject: Burrendong Wind EIS

Dear Natasha,

I am writing to you regarding the exhibition period of the Burrendong Wind Farm EIS. As you well know inhabitants of the Central West Orana REZ have been bombarded by reading material over the last couple of months, between amendment reports, EIS's and now the draft energy policy framework. Would it be unreasonable to ask for the Burrendong Wind EIS exhibition period to be extended to 90 or 120 days given the time of year and the already overwhelmed communities involved? I will be making this representation to our local MP's and Ministers Sharpe and Scully but I suspect it would give you, as planner in charge of so many major projects, more time to adequately complete what is required of you.

Kind regards,
Emma Bowman

From: Natasha Homsey

Subject: RE: Burrendong Wind EIS

Date: 16 November 2023 at 5:37:16 PM AEDT

To: Emma Bowman

Cc: Nicole Brewer

Good afternoon Emma,

Thank you for your email.

In regard to your request for your request for an extension to the exhibition of the project to be longer than 28 days, the Department will consider this request. However, I would encourage people wishing to make a submission on the project to do so within the official public exhibition timeframe (from today until Wednesday 13 December 2023) to ensure their legal rights are protected. Our team is open to receiving additional information afterwards and will consider the matters presented as part of our assessment of the application.

Kind Regards,

Natasha Homsey

Principal Planner

Energy Assessments | Department of Planning and Environment

NSW Independent Planning Commission (IPCn)

Overview

According to the NSW Independent Planning Commission website “The Independent Planning Commission makes independent and objective decisions on state significant development applications in circumstances where there is considerable community opposition, the local council objects or a reportable political donations disclosure has been made. We also provide planning advice when asked by the Minister of Planning and Public Spaces or the Planning Secretary.”

“The Commission was set up to deal independently with controversial and difficult cases. In the NSW planning system, there are several consent authorities. The Commission is the consent authority for State significant development applications where the following apply:

- there are 50 or more unique public objections to the SSD application; and/or
- the applicant has made a reportable political donations disclosure; and/or
- the local Council has objected to the SSD application and has not rescinded that objection following exhibition.

That is, when one or more of these conditions apply, only the Commission can determine the matter. Applications that meet one or more of these conditions tend to be controversial!”

From the IPCn website:

How does the Commission ensure that Commissioners have sufficient background knowledge to adjudicate complex and competing environmental, social and economic arguments about State significant developments?

Although Commissioners have experience and expertise in various specified fields, they do not sit on panels as subject matter experts.

Commissioners work hard to make independent and objective decisions about complex and contentious development applications by checking they have adequate evidence on the matter before them and then weighing that evidence in making a determination. Decisions are made based on legislation and Government policy and are informed by DPHI's whole-of-government assessment and by submissions and other material provided in the determination process.

I wonder how much weight is put on local landowner and community members submissions as opposed to the DPHI assessment of a project? If decisions are based on legislation, would the commission need to determine that there have been no breaches of legislation throughout the whole process, or do they only check legislation relative to the specific project they have been engaged to determine?

From the IPCn website:

Who reads the submissions made to the Commission panels?

Panels generally aim to read all submissions made on a case personally. Panels also rely on assistance from staff of the Office of the Independent Planning Commission, under the direction of the panel, to ensure that all submissions are read, and their content analysed and summarised for consideration by the panel.

Increasingly, the Commission complements this with automated text analysis of submissions, the results of which are sometimes presented in the panel's Statement of Reasons in tables and graphics.

Issues, concerns and substantive arguments presented in submissions are reviewed, discussed and weighed up during the panel's deliberations, and reflected in the Statement of Reasons.

Is it acceptable that “panels generally aim to read all submissions made on a case personally”? I suspect that community members would be very upset to know that the commissioners did not read their submission after the time and effort they had put into expressing either their support or objection to a project.

From the IPCn website:

Since the introduction of the Memorandum of Understanding with DPHI, in what circumstances is the Commission able to seek and obtain advice from independent experts about matters on which expert evidence is inconclusive?

The Minister's Statement of Expectations for the Commission makes it clear that DPHI is responsible for planning assessments and that duplication of this function should be avoided. If the Commission is not satisfied with advice from DPHI or from any experts that DPHI has used in preparing its assessment, the Commission may choose to seek further independent expert advice.

Given commissioners are not always experts in the field of the project they are required to determine, how can they be expected to ascertain if expert advice provided is accurate? Should independent experts not be used from the outset?

The IPCn annual reports contain a list of the cases completed throughout the reporting period. Below is the information I have extracted from those reports (any mistakes are mine):

- Projects determined since most recent Annual Report – APPROVED with conditions - 4 large scale renewable energy infrastructure projects (3 solar, 1 wind). Plus one solar project case in progress.
- 2023-24 Annual Report – APPROVED with conditions – 6 large scale renewable energy infrastructure projects (3 solar, 2 wind & 1 gas firming station).
- 2020-21 Annual Report – APPROVED with conditions – 5 large scale renewable energy infrastructure projects (all solar).
- 2019-20 Annual Report – APPROVED with conditions – 5 large scale renewable energy infrastructure projects (2 solar, 3 wind).
- 2018-19 Annual Report – APPROVED with conditions – 3 large scale renewable energy infrastructure projects (1 solar, 2 wind).
- 2017-18 Annual Report – APPROVED with conditions – 2 large scale renewable energy infrastructure projects (1 solar, 1 wind).

If my reading of the information contained in the annual reports is correct the Independent Planning Commission has not refused approval of a large scale renewable energy infrastructure project since its inception (there was one project that withdrew its application prior to IPCn determination). Does the IPCn have the expertise, knowledge or independence to refuse approval for these projects against DPHI recommendation for approval?

I noticed during the Birriwa Solar IPCn public meeting that not one speaker, except the proponent and DPHI, spoke favourably in regard to the project, the same at the Spicer's Creek Wind IPCn public meeting. The Birriwa Solar case prompted community members and organisations to compile 65 submissions, of which only the 58 website submissions have been collated according to sentiment – 56 objections and 2 supporting – yet IPCn still determined approval citing minimal, insignificant, unlikely, manageable, acceptable, monitorable, mitigable and not adverse impacts to the local area and community, and, of course, the project being in the "public interest". Spicers Creek Wind elicited 36 objections, six supporting submissions and one comment. Like DPHI, how many objecting submissions, or what percentage of the submissions must object to make IPCn consider a project not in the "public interest"? How are the views of the general public taken into account if not through submissions and attendance at public meetings?

Should the "independence" of the IPCn be questioned given their signage?



I refer the committee to email correspondence [IPCN 02](#). regarding a potential conflict of interest involving an IPCn commissioner, in fact, panel chair, and the response received from the Commission Chair. As suggested in our email to the Chair, is it fair, or just, that a self described "leading advocate for change in the resources and energy sectors" that "aligns with organisations focussed on a clean energy future" is Chair of the Panel responsible for determining the outcome of a contentious large scale wind energy generation project?

Correspondence

[IPCN 01](#).

-----Original Message-----

From: Emma Bowman

Sent: **Tuesday, August 6, 2024 1:00 PM**

To: IPCN Enquiries Mailbox

Subject: Spicers Creek IPCn public meeting

Good morning,

As you're aware the public meeting for the Spicers Creek Wind project will take place in Dunedoo on Thursday, 29th August, 2024. I had planned to make a presentation at the meeting however it has fallen on the same day as the stud Bull Sale where I purchase breeding stock each year, which falls on the last Thursday in August annually.

Due to this clash I wondered if it would be possible to pre-record my speech to be played in the Jubilee Hall on the day of the meeting alongside my powerpoint presentation? I would really appreciate the opportunity to have my verbal submission considered.

Thank you for your consideration.

Yours sincerely,
Emma Bowman

On **6 Aug 2024, at 4:50 PM**, IPCN Enquiries Mailbox

wrote:

Dear Ms Bowman

The Commission is happy to accept prerecorded audio-visual submissions in the place of written submissions, however, the Commission does not typically support submissions at public meetings being given in the absence of the person making the submission.

If you could instead provide us with an electronic copy of the recording before the deadline for submissions, we can provide a copy to the Panel to listen to and publish a copy of the electronic file to our website in accordance with our Public Submissions Guidelines.

Regards,

Office of the Independent Planning Commission NSW Suite 15.02 Level 15
135 King Street Sydney NSW 2000

e: ipcn@ipcn.nsw.gov.au | p: (02) 9383 2100 | www.ipcn.nsw.gov.au

From: Emma Bowman <tinmanfarming@outlook.com>

Sent: Monday, August 12, 2024 9:59 AM

To: IPCN Enquiries Mailbox <ipcn@ipcn.nsw.gov.au>

Subject: Re: Spicers Creek IPCn public meeting

Good morning,

I appreciate the Commission would rather a person be in attendance at a public meeting to make a presentation but given my circumstances I wonder if it is possible to make an exception and accept a pre recorded presentation in this instance? As I have previously explained, the commitment I have is an annual event that falls on the same day every year, and one that is essential for me to attend for the continuation and future prosperity of my business. The last IPCn public meeting I attended in Dunedoo forgoing a business meeting with my accountant as the IPCn meeting was called on such short notice; local community members are making large sacrifices in an attempt to protect their homes, livelihoods, communities and regions and provide the IPCn with in depth, relevant information to make the determination of projects.

I believe it is important for my presentation to be heard by the proponent, DPHI and the general public on the day of the IPCn meeting in Dunedoo so there is the opportunity for my questions and concerns to be addressed by the proponent and/or DPHI in their closing remarks or taken on notice.

I would appreciate your understanding in this matter.

Yours sincerely,
Emma Bowman

From: IPCN Enquiries Mailbox

Subject: RE: Spicers Creek IPCn public meeting

Date: 13 August 2024 at 9:58:41 AM AEST

To: Emma Bowman

Dear Ms Bowman

We understand that your commitments preclude your attendance at the public meeting for this matter. In order to accommodate people interested in making submissions who are unavailable to attend the public meeting, the Commission is accepting submissions (which can include audio-visual recordings) for over a month from 2 August to 6 September 2024. All submissions received in that period will be considered by the Panel and published in accordance with the Commission's Public Submissions Guidelines. For submissions received before the public meeting, those submissions may inform any questions the Panel may put to the Department, Applicant or others.

We understand that you want your submission heard by the Department, the Applicant and the public. They will be able to review the submissions published by the Commission, however the purpose of the Commission's submissions process (including submissions given at public meetings) is to transparently inform the Panel's deliberations.

Regards

Office of the Independent Planning Commission NSW

IPCN 02.

From: Emma Bowman

Sent: Thursday, July 25, 2024 8:07 PM

To: IPCN Enquiries Mailbox

Cc: Sally Edwards

Subject: ATTN: Chair of the IPCn RE: Hills of Gold Wind Case

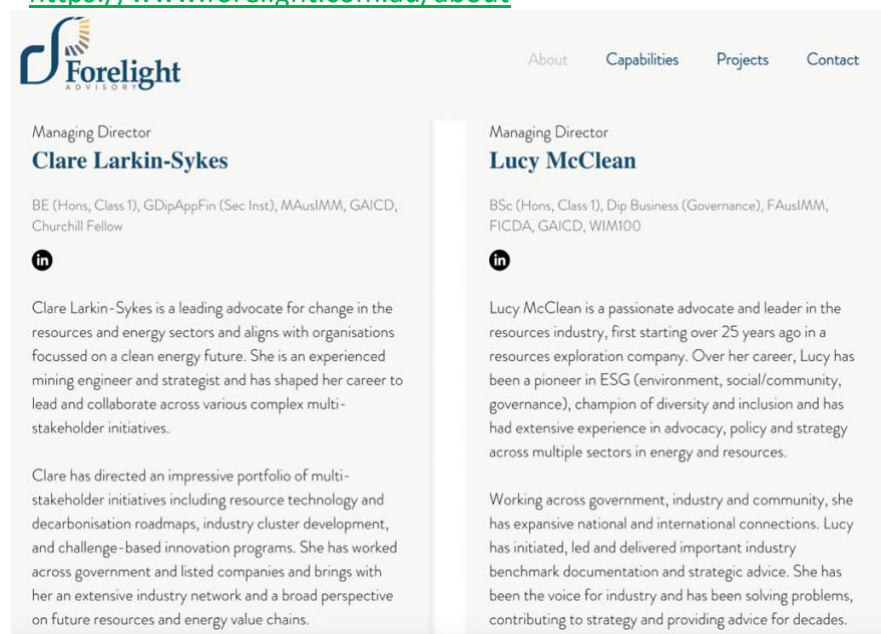
ATTN: Chair of the Independent Planning Commission - Mr Andrew Mills
RE: Hills of Gold Wind Case

Dear Mr Mills,

We write to you today as two concerned community members, both of whom made presentations at the Hills of Gold IPCn meeting in Nundle in February 2024. We have no doubt you are aware of the correspondence received by the previous Chair of the IPCn from Mr Bill Stinson regarding an apprehension of bias toward Hills of Gold Panel Chair, Mrs Clare Sykes.

We too, are concerned about Mrs Sykes' potential conflict of interest as Panel Chair given the following evidence:

1. Forelight Advisory (previously Larkin Sykes Advisory - <https://www.larkinsykes.com.au/>)
- <https://www.forelight.com.au/about>



The screenshot displays the Forelight Advisory website. The header includes the company logo and navigation links: About, Capabilities, Projects, and Contact. The main content area features two profiles of Managing Directors. On the left is Clare Larkin-Sykes, with her qualifications (BE (Hons, Class 1), GDipAppFin (Sec Inst), MAusIMM, GAICD, Churchill Fellow) and a brief bio stating she is a leading advocate for change in the resources and energy sectors. On the right is Lucy McClean, with her qualifications (BSc (Hons, Class 1), Dip Business (Governance), FAusIMM, FICDA, GAICD, WIM100) and a bio describing her as a passionate advocate and leader in the resources industry with over 25 years of experience. Both profiles include LinkedIn icons.

Forelight Advisory brings a deep understanding, extensive skill set and next-generation thinking to resources and energy organisations seeking transformational change. We specialise in optimising connections between industry, government, community and research to deliver a clean and sustainable future.

Forelight Advisory has extensive experience and expertise, extending across both national and international settings encompassing policy, government, engineering, environment, social or community, governance, inclusion and diversity.

Our strength is our ability to capture technical insights, industry and technology trends and emerging policy developments to unlock and optimise sector positioning and sustainable growth.

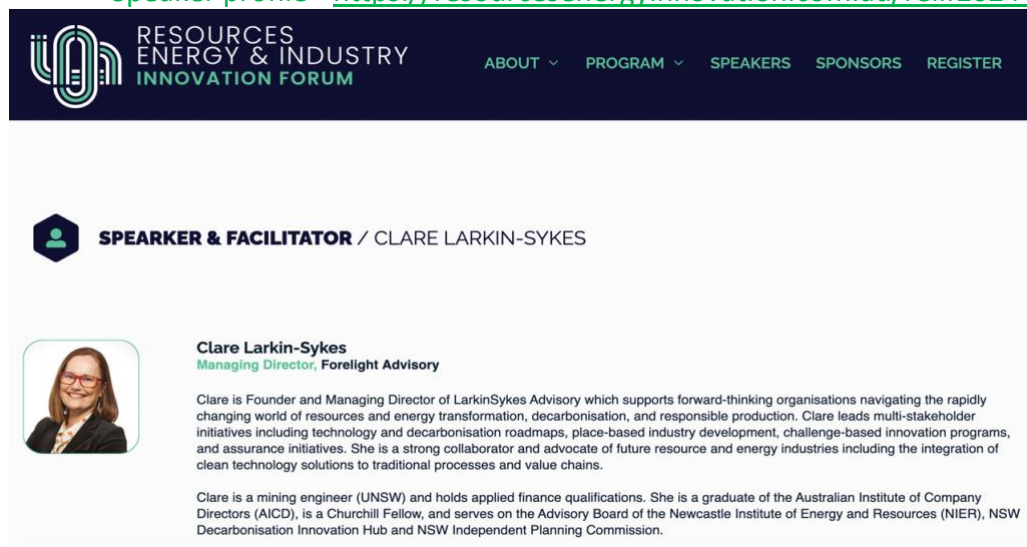
We are a team of strategist, underpinned by engineering and science that specialise in resources and energy sectors.



2. 2024 Resources, Energy & Industry Innovation Forum (REIIF) - "If you are looking to find out about the outlook for the resources and energy sector in NSW, make sure to attend the **Resources, Energy & Industry Innovation Forum (REIIF)** on 6-8 August 2024 in Dubbo, NSW.

Brought to you by the Association of Mining and Energy Related Councils (MERC) NSW and the Regional Development Australia (RDA) Orana."


Speaker profile - <https://resourcesenergyinnovation.com.au/reiif2024-speaker-clare-larkin-sykes>



RESOURCES ENERGY & INDUSTRY INNOVATION FORUM

[ABOUT](#) [PROGRAM](#) [SPEAKERS](#) [SPONSORS](#) [REGISTER](#)

SPEAKER & FACILITATOR / CLARE LARKIN-SYKES

 **Clare Larkin-Sykes**
Managing Director, Forelight Advisory

Clare is Founder and Managing Director of LarkinSykes Advisory which supports forward-thinking organisations navigating the rapidly changing world of resources and energy transformation, decarbonisation, and responsible production. Clare leads multi-stakeholder initiatives including technology and decarbonisation roadmaps, place-based industry development, challenge-based innovation programs, and assurance initiatives. She is a strong collaborator and advocate of future resource and energy industries including the integration of clean technology solutions to traditional processes and value chains.

Clare is a mining engineer (UNSW) and holds applied finance qualifications. She is a graduate of the Australian Institute of Company Directors (AICD), is a Churchill Fellow, and serves on the Advisory Board of the Newcastle Institute of Energy and Resources (NIER), NSW Decarbonisation Innovation Hub and NSW Independent Planning Commission.

Is it fair, or just, that a self described "leading advocate for change in the resources and energy sectors" that "aligns with organisations focussed on a clean energy future" is Chair of the Panel responsible for determining the outcome of a contentious large scale wind energy generation project?

We appreciate your impartial consideration of the above matters and look forward to your reply.

Yours Sincerely,

Emma Bowman & Sally Edwards

31 July 2024

Ms Emma Bowman & Ms Sally Edwards

By email:

Dear Ms Bowman and Ms Edwards

Hills of Gold Wind Farm SSD-9679

Thank you for your email received on 25 July 2024. I am aware of previous correspondence regarding this matter between the Commission and Mr Bill Stinson, which is available on our website.

In your letter you assert that Ms Clare Sykes, the Chair of the Commission's Panel determining the above application, has a potential conflict of interest in undertaking her functions as Panel Chair.

The basis for this assertion is that, in materials on Ms Syke's business website and a speaker biography for a Resources, Energy & Industry Innovation Forum, Ms Sykes is described as a "leading advocate for change in the resources and energy sectors" and as a person who, in a professional capacity, "aligns with organisations focused on a clean energy future".

I have considered this matter in accordance with the Commission's *Conflict of Interest Policy* (accessible [here](#)).

I note that:

- Ms Sykes has no pecuniary interest in relation to the present application.
- The materials you forwarded to the Commission are expressed at a high level of generality without any reference to the present application or its location – or to windfarm development at all.
- The materials you forwarded to the Commission do not suggest any ideological commitment to renewable energy and are consistent with the stated positions of the Commonwealth and NSW Governments (see, for example, Table 3 of the Department of Planning, Housing and Infrastructure's Assessment Report for the application, accessible [here](#)).

Accordingly, I find that the material you have provided to me does not indicate that there is any actual, potential or perceived conflict of interest that prevents Ms Sykes from sitting on the Panel determining the present application.

Your letter and this response will be published on the Commission's website in 24 hours, with redactions of your contact details.

Yours sincerely

Andrew Mills
Commission Chair

Australian Energy Infrastructure Commissioner (AEIC)

Overview

According to the Australian Energy Infrastructure Commissioner website “The Commissioner’s role is guided by the updated Terms of Reference issued by the then Minister for Energy and Emissions Reduction, in March 2021. The Office of the Australian Energy Infrastructure Commissioner helps community members address their concerns about wind farms, large-scale solar farms, energy storage facilities and new major transmission projects. The Office also identifies and promotes best practices, working with stakeholders from all levels of government, industry and the community. The Office performs the following roles:

- facilitating the referral and resolution of complaints received from concerned residents about proposed or operating wind farms, large-scale solar farms (5 MW or more), energy storage facilities such as pumped storage hydropower (pumped hydro), large-scale batteries (1 MW or more) and new major transmission projects;
- identifying and promoting best practices related to the planning, development and operation of energy projects, including standards and compliance, complaint handling procedures and community engagement; and
- providing greater transparency on information related to wind farms, large-scale solar farms, energy storage facilities and new major transmission projects in Australia.”

I have had interactions with both Andrew Dyer, the inaugural AEIC, and John Sheldon, former interim AEIC. Both were sympathetic to the issues I raised and suggested that renewable energy developers and government authorities should improve the way they deal with communities impacted by large scale renewable infrastructure projects, yet, unfortunately, I do not think any changes have been made on the ground to date. The rules may dictate how community engagement and consultation is carried out but in a lot of cases the relevant boxes are ticked without actually doing the work on the ground.

I spoke to then interim AEIC, John Sheldon, in August 2024 regarding a complaint I made to ACEN Australia with respect to the behaviour of staff at an IPCn public meeting held in Dunedoo in June 2024. Despite the below email correspondence from Mr Sheldon received on 30th August 2024 I have had no further communication with ACEN Australia regarding this matter.

30th August Email from Interim AEIC, John Sheldon:

“As discussed last week over the phone, I spoke to Mr Killian Wentrup who is the head of development at ACEN and passed on your concerns about the handling of your complaint. I conveyed my view that staff conduct is a critical part of what constitutes good engagement, especially where there are sensitive issues being discussed, and that ACEN’s written response could have acknowledged the personal experience of those who were present at the IPC meeting. I have strongly encouraged ACEN to have a further conversation with you about this matter.

I also confirm my advice over the phone that once a project receives planning approval, this does not mean a company should stop engaging with impacted neighbours and the wider community. Companies should be continuing to work with locally impacted people during all stages of the life-cycle of a project, including development, construction, operation and the de-commissioning. I would encourage you in your discussions with ACEN to ask them about the details of their plans for ongoing engagement with neighbours and the wider community.”

Community Engagement Review

On the 20th of September 2023 I was one of two Dunedoo district landowners who met with Mr Andrew Dyer, the then AEIC, and Mr Chris Golding from the Department of Climate Change, Energy, Environment and Water, in regard to the treatment of transmission affected landowners and more

generally, the Central West Orana REZ and impacts of large scale renewable energy projects on the region. Mr Dyer listened, with obvious disappointment, to our examples of poor community engagement and consultation and the disrespect and disregard of transmission affected landowners by EnergyCo employees, contractors and consultants. Our stories were not new to him; he had already heard the same from countless landowners around the country which is obvious given the outcomes of the Community Engagement Review.

From the Community Engagement Review – Report to the Minister for Climate Change and Energy – December 2023:

The Review held over 75 meetings throughout Australia, with more than 700 participants in attendance.

- The Review received:
 - over 500 submissions
 - over 250 survey responses.

The majority of survey responses were received from landholders and community members living in close proximity to renewable energy infrastructure and new transmission infrastructure.

Approximately 20% of respondents currently host, or expect to host, renewable energy infrastructure.

Approximately 63% of respondents currently live within 5 km from an operating or proposed renewable energy or transmission infrastructure.

The relevant survey results are depicted in Image 1 on page 4.

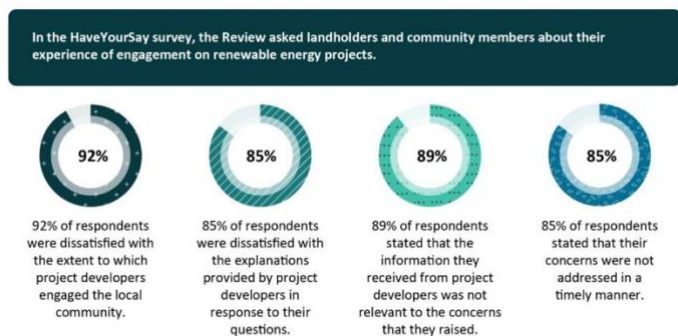


Image 2. Survey results indicate that landholders and community members were generally dissatisfied with the engagement that they received from project developers.

Poor engagement practices experienced by landholders and community members have led to a material distrust of project developers and, particularly, developers of new, long-distance transmission projects and prospective electricity generation projects along the proposed routes. There does not appear to be any formal scheme to rate or assess developers regarding their track record and capability in community engagement.

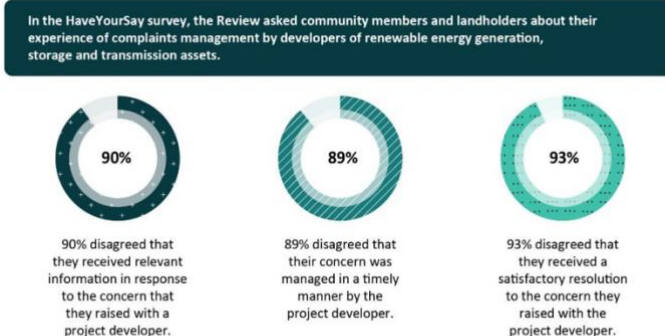


Image 4. Survey results indicate that landholders and community members were generally dissatisfied with developer responses to their complaints.

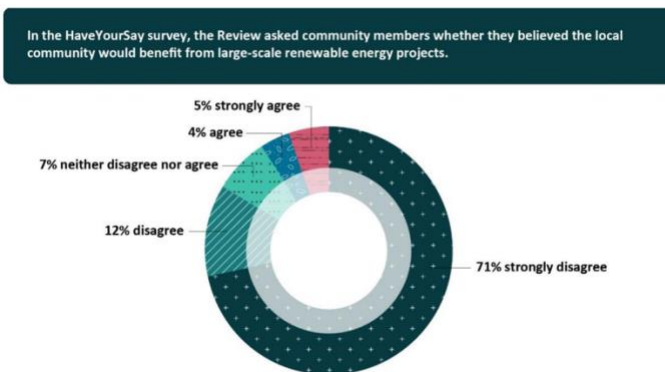


Image 5. Survey results indicated that most landholder and community participants did not believe that local communities would benefit from renewable energy projects.

The Review heard from many participants who were eager for the energy transition to leave a positive, lasting legacy for regional communities. However, participants were concerned that without a holistic plan, communities would be left worse off after the development activity concluded.⁵² One participant told the Review:

'When going into consultation we should not be asking how to get social acceptance right, we should be asking how to get regional development right.'⁵³

I believe the above results speak for themselves yet, again, we have seen no change on the ground in the CWO REZ in relation to community consultation and engagement, and from what I understand the situation is repeated all over the state and country.

Property Rights Australia & National Rational Energy Network Community Impact Survey

About Property Rights Australia

“Property Rights Australia (PRA) was formed in 2003 to protect the property rights of those unfairly targeted by the Vegetation Management Act 1999. We are a non-profit organisation of primary producers and small business people mostly from rural and regional Queensland who are concerned about the continuing encroachment on the rights of private property owners in the development, introduction and administration of policies and legislation relating to the management of land, water, and other resources. Set up in South West Queensland, PRA's membership now extends across most states and multiple major rural industries, PRA is not affiliated to any political party.”

About the National Rational Energy Network

“The National Rational Energy Network (NREN) is a grassroots national movement networked across hundreds of communities all adversely impacted by the Australian government's reckless rollout of unreliable, costly, and environmentally damaging wind turbines (land and offshore), grid solar systems, pumped hydro projects, and high-voltage transmission lines. Formed in August 2023, it connects over 120 rural and regional community groups from North Queensland to Tasmania, across to South Australia and Western Australia. It continues to expand, gaining support from concerned Australians, politicians, conservationists, and communities all devoted to safeguarding our country, coastline, oceans, and rivers from the detrimental effects of the current Australian Government's rushed and reckless energy laws, policies, and projects.”

Background to Survey on Community Impacts from Renewable Energy Infrastructure

“The ongoing construction of renewable energy infrastructure has significantly affected rural and regional Australians. The impacts on these communities have largely been overlooked by both the government and corporations, who advocate for a 100% renewable energy policy as essential for Australia's future energy needs. This oversight has resulted in several issues; community division, the loss of freehold land, a preference for developing renewable energy projects outside urban areas (often avoiding government-owned land), and a lack of transparent and open community consultation. The rapid expansion of renewable energy infrastructure has prompted the formation of over 120 community action groups across Australia. These groups' concerns are often ignored by the mainstream media, which promotes the narrative that renewable energy infrastructure must be built regardless of its impacts on the quality of life in rural communities. The prevailing message is to "create rural and regional economic activity while preserving the environment," exemplified by initiatives like renewable energy zones. Additionally, there seems to be a lack of consideration and even hostility towards individuals and organisations raising critical questions, such as:

- Why have renewable energy infrastructure projects been rushed?
- Why has a balanced mix of energy sources not been fully considered?
- What does genuine community consultation look like?
- Why do rural and regional communities feel their concerns are being ignored, and why are current consultation processes perceived as superficial or insincere?”

The Results

Executive Summary

Feedback from the community impact survey was collected between Saturday 12 April and Friday 10 May 2024, with 775 responses collected during this period.

The community impact survey generated multiple findings. The themes and sub-themes are presented in order of priority and noted as follows:

- **Environmental damage:** (1) destructive impacts on native flora and fauna, and (2) the value of the environment to rural and regional communities is being ignored.
- **Renewable energy infrastructure:** (1) lack of consideration for alternative infrastructure options, (2) doubts regarding the benefits and long-term reliability of renewables as a baseload power option, (3) energy mix not being fully considered, and (4) renewable energy projects will not deliver energy security.
- **Community division:** (1) negative impacts on rural communities being ignored and undervalued by government and energy corporations, (2) impacts are borne by rural and regional communities, and (3) social cohesion in rural communities is being fractured by government and energy companies.
- **Lack of trust in government and political parties:** (1) no consideration from government on the negative economic impact in the regions such as tourism and a decline in property values, (2) government behaviour considered deceptive, (3) major political parties are not listening to rural communities, (4) renewable energy projects are being rushed through without regard to community concerns, (5) very limited trust in government, and (6) renewables driven by political ideology.
- **Damage to the food production system:** (1) loss of agricultural land.
- **Health and social implications:** (1) unknown mental health and social impacts on rural communities, and (2) health and social implications are not being adequately considered.
- **Community consultation:** (1) lack of transparency in community consultation processes, and (2) rural community concerns are being ignored.
- **Climate change agenda:** (1) energy transition driven by climate ideology, and (2) international climate policy agendas are driving energy policy in Australia.
- **Corporate greed:** (1) perception of corporate greed over community liveability and cohesion.

11) Respondent Feedback

Respondents were asked to provide commentary regarding their views of renewable energy projects with more than 60% of respondents providing additional feedback. While Table 4 provides key themes and sub-themes, the comments noted below provide specific view of their concerns.

My concern is not that government is not listening. My concern is that they know the damage they are doing to the environment, communities and families but disregard them, as they are hell bent literally on following another foreign agenda.

The potential impacts of renewable energy infrastructure on the agricultural industry and rural and regional Australia have not been adequately or thoughtfully considered. The "rapid transition to renewable energy" is a rushed, unplanned, and unrealistic ambition all brought about by the Net Zero policy which, it seems, will be followed through at any cost! Projects, even in the early planning stages, are causing enormous unrest and devastation in once cohesive communities in rural Australia. The divide and conquer tactic is used by developers, and government organisations alike, to sign landowners up for wind, solar and transmission infrastructure projects.

12) Conclusions

The survey results highlight a deep-seated scepticism and dissatisfaction among rural and regional Australians concerning the implementation and impact of renewable energy projects. An overwhelming 93% of respondents believe that governments have not acted in good faith regarding the implementation of these projects. Similarly, 94% feel that government departments have failed to conduct open and transparent consultations, while 95% assert that their concerns have not been adequately addressed. This dissatisfaction is compounded by the perception of coercive tactics used by energy companies, with 76% of respondents reporting pressure to access private properties and only 3% believing that these companies have acted in good faith.

Respondents expressed strong cynicism about the benefits of renewable energy as a baseload power option. They criticised the government's handling of the transition process, describing it as rushed and lacking genuine community consultation. The environmental and social impacts of these projects are significant concerns. A vast majority, 94%, doubt that the government has fully considered the environmental impacts of renewable energy projects, while 95% believe that the impacts on families and rural communities have been overlooked.

The survey also reveals the perceived economic repercussions of renewable energy projects, with 80% of respondents believing these projects contribute to higher electricity prices, and 78% reporting that these developments are adding to the cost of living pressures. Additionally, many respondents reported adverse health and social effects, such as difficulties in focusing, feelings of isolation, and increased irritability, with 73% of respondents feeling emotional over trivial issues. Investigations should be undertaken to further quantify the potential link between the rollout of renewable energy infrastructure and the health and social implications on rural people.

Overall, the results underscore the need for a more transparent, inclusive, and considerate approach to transitioning to a clean energy future. The clear distrust in both government and renewable energy companies indicates a significant gap in communication and engagement with rural Australians. To build trust and ensure a successful energy transition, it is crucial to address these communities' concerns genuinely and thoroughly. Energy policy development should strive to balance environmental goals with the socio-economic well-being of all affected populations, ensuring that the transition to a cleaner energy future does not come at the expense of rural livelihoods and environments.

New South Wales Government

Overview

Prior to the outrage being caused by the CWO REZ I could have counted the number of encounters I had had with politicians on one hand, and politics wasn't something I found myself heavily interested in. Since being made aware of the declaration of the CWO REZ, realising what it meant, and countless hours spent researching projects, their potential impacts, reading legislation and lobbying for community voices to be heard and local knowledge to be valued I have found how difficult it is to get a foot in the door with the majority of politicians, both State and Federal, and become enlightening about the frustrating merry go round of bureaucracy.

Meetings

On the 7th September 2023, The Hon. Tara Moriarty, Minister for Agriculture, Regional New South Wales and Western New South Wales met with a group of NSW Farmers' Association (NSWFA) members on two properties near Birriwa, NSW – "Gilgal", owned by Stuart and Donna Hackney and "Merotherie", owned by Jim & Amanda Bowman. Minister Moriarty listened intently to the concerns of local landowners who became quite emotional about the potential impacts of the CWO REZ to their homes, lives, businesses and families. It was nice for community members to finally feel like we had been heard by someone with the power to make meaningful change to the process and potentially mitigate the impacts we are most concerned about.

Unfortunately, it appears that our time was wasted at that meeting given there were no discernible positive outcomes; nothing changed for those of us on the ground!

The below was presented to Minister Moriarty:

Facts about wind, solar and transmission line developments in the Dunedoo District

The area within a 50km radius of Birriwa is equal to 785,400ha.

Solar projects within this area in planning, under construction and in operation will make up 1.46% of the total area.

Wind developments currently in planning consist of 602 turbines and cover 63,500ha (8.1% of the total area).

PLUS workers camps, energy hubs, site offices, batching plants, quarries, power lines etc.

The overall repercussions of these projects could impact 15% of the total area outlined.

- One turbine takes 7 oversize, over mass (OSOM) loads from Newcastle. Three of which are 90 metres long (equal to a road train with 6 trailers!).

602 turbines x 7 OSOM loads = 4214 loads from Newcastle

at 2 loads per day would take nearly 6 years

at 3 loads per day would take nearly 4 years

CAN THE GOLDEN HIGHWAY HANDLE THIS TRAFFIC?

WHAT ABOUT MERRIWA'S MAIN STREET?

- Each turbine concrete base is 30m x 30m x 2.5m = 2250m³. According to the Spicers Creek Wind Farm EIS it will take 8-12 hours to pour the approximately 250 to 300 loads of cement.

602 turbines x 2250m³ = 1,354,500m³ of concrete

8m³ per load = 169,312 truck loads

THE ALTERNATIVES

Dubbo Base Hospital has a car park shaded by solar panels; why can't that be done everywhere!?

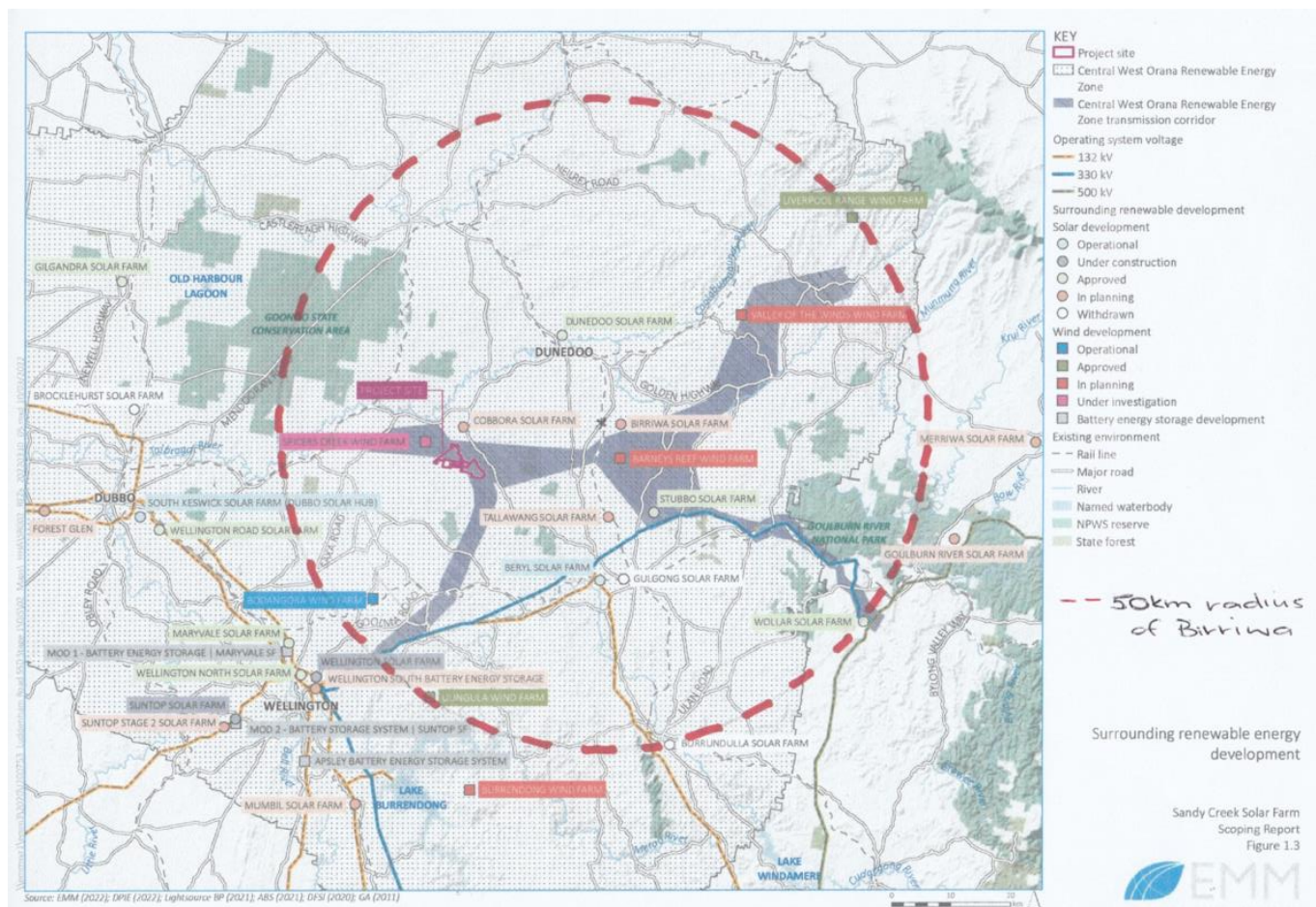
Solar panels on vacant land and industrial buildings in major cities. Generating power where it will be used negates the need for major transmission line projects.

Government incentives for the general public and private business to contribute to the energy crisis.

THE DUNEDOO DISTRICT IS A TIGHTLY HELD AREA, PASSED DOWN THROUGH FAMILIES FOR GENERATIONS. IT'S ALWAYS BEEN KNOWN AS A SAFE FARMING COMMUNITY ON WHICH THE SMALL TOWNS RELY.

What you need to know about the flood plain at Merotherie Road!

- 1.7km of Merotherie Road is a flood plain. It is marked on maps but not recognised by local councils so will most likely slip past NSW Planning!
- Floodwater currently comes up, crosses the flood plain and subsides without serious and long-lasting disruption to agricultural activity.
- Upgrades with culverts and other engineering solutions will cause flooding upstream and intensify and concentrate flows downstream which will result in significant erosion and reduction in available agricultural land and create new drainage lines and artificial water courses. There is absolutely no doubt that any engineering solutions will always impact the natural environment.
- Secondary roads being upgraded to create access for wind and solar developments will also impact the whole catchment's water courses. The Talbragar River flows into the Macquarie River near Dubbo which impacts the Macquarie Marshes and other significant environmental areas. The health of the river system is paramount!
- The run off from 1200ha of solar panels, (a non-porous surface) at the Birriwa Solar Farm, will flow into the catchment of the Talbragar River causing the greater flows downstream.
- According to the flood risk management manual (NSW DPE) "flooding results in significant risk to many communities across New South Wales. This risk stems from human interaction with flooding through the occupation and use of floodplains. Floodplains are strategically managed for the sustainable long-term benefit of the community and the environment, and to improve community resilience to floods. NSW Government infrastructure providers are responsible for considering the need to avoid causing an increase in the threat to personal safety and to property and avoid any unwarranted increase in potential damage to public property and services, and the impacts of flooding on the emergency management requirements of the community when planning new utilities or transport infrastructure."
- As it is "human interaction within the floodplain" that is the stem of the cause surely, wouldn't it appear that remote sites (requiring this access) are inappropriately being considered for this development?



On the 13th February 2024 the NSWFA organised a meeting for approximately ten local landowners with The Hon. Penny Sharpe, Minister for Climate Change, Energy, the Environment and Heritage and The Hon. Daniel Mookhey, Treasurer, to be held at the property “Merotherie”, located near the main Energy Hub for the CWO REZ Transmission project. The Dunedoo branch of NSWFA had been calling for a meeting with Minister Sharpe for months, if not years, so she could see and hear, first hand, the impacts on the local communities and the way transmission affected landowners were being treated by EnergyCo.

Several CWO REZ transmission affected landowners gave Minister Sharpe and the Treasurer an overview of their experience of the process up until that time; all explaining the abhorrent treatment they had been subjected to by EnergyCo employees, contractors and consultants.

There were also a few local landowners who outlined the general impacts of the CWO REZ to the Minister and Treasurer, myself included (see speech below).

Following my speech, Minister Sharpe stated that she was unable to press pause on the “rapid transition to renewable energy” due to the time constraints caused by coal fired power coming out of the electricity grid in the near future. She also conceded that there had been a lack of empathy, understanding and acknowledgement that people are at the centre of the transition – I believe she was alluding to people owning the land that is required for transmission. Minister Sharpe openly admitted that there needs to be more transparency in the rollout of the CWO REZ transmission project, and stated that questions landowners had asked were legitimate and them not being answered was “not acceptable”. Interestingly Minister Sharpe also said that her visit in February was “the start of a conversation”, yet we have not heard from her, personally, since that time. Does that have something to do with the fact that it was suggested that members of the group recorded the meeting and leaked that to the media? I can categorically state that no landowner present at the meeting did that, but the article

that appeared in the Daily Telegraph following the meeting would not have appeased the Minister at all. It is somewhat intriguing that we were accused of such a thing when the quote inserted in the aforementioned article was simply, “not fit for purpose” (in regard to the Just Terms Act) – does the Minister believe that a group of farmers wouldn’t be capable of remembering four words that were used to describe a piece of legislation affecting their whole lives?

Speech presented to Minister Sharpe & Treasurer during visit to Merotherie 13th February 2024

Minister Sharpe and Treasurer, thank you for taking the time to meet with us today. I am frustrated our community has had to endure so much anguish and hardship to get to this point but we do appreciate you giving us a chance to express our concerns regarding the transmission project and the CWO REZ as a whole.

What has transpired in this district over the last couple of years has been nothing short of traumatic. To have your home and community formally declared part of a Renewable Energy Zone without your knowledge or consent comes as quite a shock. Then to have landowners approached by EnergyCo and informed their properties were within the study corridor for the transmission project, and could be compulsorily acquired, has devastated many farming families in this area. We are also very aware that the current transmission proposal is only stage one, who will be affected by stages two and three, and when will they find out? The unknown is terrifying and very unsettling.

What followed this declaration has been a bombardment of project scoping reports and environmental impact statements. These documents often total thousands of pages, the Central West Orana Renewable Energy Zone (CWO REZ) transmission documents totalled over 7900, which need to be read, digested and responded to within 4-6 weeks. There was a three month period at the end of 2022 where there were six CWO REZ project EIS’s exhibited, and from mid May until the end of 2023 there was only approximately twelve weeks when there wasn’t a CWO REZ project on exhibition and there are now over a dozen projects preparing EIS’s. This has overwhelmed individuals and caused enormous levels of stress and angst for communities affected by these proposals. Currently, there are 49 projects within the CWO REZ boundary operating, under construction and in various stages of development – 28 solar, 12 wind, 7 stand alone battery energy storage systems, 1 pumped hydro and stage one of the transmission project. These are just the ones we have been made aware of. This is a huge burden for our district to bear.

I believe not enough emphasis has been placed on the cumulative impacts of the renewable energy infrastructure proposed for the CWO REZ. It is my understanding that EnergyCo has done studies regarding this but only the summary, not the detailed reports, have been made public. I have calculated, through my own investigation into scoping reports and EIS’s as it is not available anywhere else, that there will be over 17,000ha of solar infrastructure, comprising of over 8.5 million panels, and 922 wind turbines on over 150,000ha of land, within the CWO REZ boundary if all the proposed projects are granted approval. I am also aware of more landowners signing options for wind and solar infrastructure, but there is no information available for those projects at this time, and there is no maximum capacity stated for this REZ. How much agricultural land will become industrial land? How much is too much? As formally stated in the Australian Energy Infrastructure Commissioner’s review community consultation and engagement has been found lacking. The conduct displayed by EnergyCo and private developer staff toward landowners and community members has been less than satisfactory, in some cases disgusting, often leading to division in once cohesive communities due to intentional deception and manipulation tactics used to divide and conquer. The EnergyCo community engagement team was replaced during the CWO REZ transmission EIS exhibition period – that timing could not have been worse for community members who had built a relationship with those staff, and it seems all previously gained knowledge went with the outgoing team members. We, as community members, were not given warning nor any reasons for that decision.

The draft energy policy framework was placed on exhibition from mid November 2023 to the end of January 2024. According to the DPHI, the guidelines are expected to “support faster and more consistent decisions, provide industry greater investment certainty, and give communities more

transparency about how we will assess and manage impacts”. While these documents should provide landowners with more confidence there is one glaring issue – it is stated that “the Minister will consider requests to declare solar & wind energy development as Critical State Significant Infrastructure if it includes a significant energy storage system (for example, a delivery capacity of 750MW or more)”. This suggests to us that, in the future, compulsory acquisition could possibly be used for solar and wind projects.

Affected communities need the opportunity to actively participate in the early planning of projects to get the best results on the ground; this means less desktop studies and more listening to local knowledge, and total project transparency. It also means not leaving important decisions until “detailed design”, “further refinement” or “post development consent”, which we do not get to comment on. Transmission affected landowners are being expected to, in some cases, sign agreements without a finalised route, or any knowledge of what construction will look like on their property. Will they have fences to keep their stock in? Will their stock have access to water and shade? How long will construction take? And the list goes on.

Construction of the proposed stage one CWO REZ transmission project would require 4000ha and will have direct impacts on 1032ha of native vegetation and many threatened flora and fauna species. While most farmers wouldn’t label themselves environmentalists, we care deeply about the land we have been entrusted to manage and don’t want to see unnecessary devastation. The removal of trees, destruction of habitat, disturbance of soil and changing of natural watercourses will have enormous effects on our land, especially during the construction phase of each of the proposed infrastructure projects. Mitigating these sorts impacts often calls for offsets, but is it really acceptable to claim other already existing ecosystems as suitable compensation for the destruction of others?

Seven years ago this region faced a catastrophic natural disaster in the form of the Sir Ivan Bushfire. Over 50,000ha was burnt, a length of approximately 50km, within three days due to intense heat and wind. Homes and infrastructure, livestock, habitat and wildlife were ravaged, the scars of which are still visible today. Whilst there is no clear acknowledgment regarding aerial firefighting limitations to date from the RFS bureaucrats, it is obvious to those of us who have been involved in previous firefighting efforts that areas with wind turbines and transmission lines will be avoided by planes and helicopters during a bushfire in difficult terrain that could well be a life and death situation not only for livestock and wildlife but for local residents. What will rural firefighting look like within Renewable Energy Zones? Will we be able to adequately protect ourselves, our homes, our livestock, our environment and our wildlife?

There are many more potentially monumental impacts of large scale renewable infrastructure on farmers, landowners, communities and greater rural and regional NSW and Australia. Land use conflict – land taken out of food and fibre production will decrease Australia’s capacity to feed itself. Will the cost of living increase with more imported food and fibre? Roads and transport – it is estimated there will be thousands of extra vehicles on local roads during the construction phase, how will local road user safety be guaranteed? What measures will be put in place for farmers who own land on both sides of a transport route and frequently walk livestock across to access feed and water – stopping the traffic is already an onerous task? Water use – we rely heavily on water for livestock, who is considering the cumulative impact of all infrastructure projects on our water tables? Noise impacts and visual amenity – visual impacts are only measured from residences, as farmers we spend most of our time in the paddocks, why is that impact not considered? There are specific noise exceedance regulations but when you live in a quiet rural area how much noise is too much, and why is it not those who are directly impacted that get to decide? Workforce – will the need for thousands of workers impact competing industries like tourism and agriculture? Then there are implications to businesses that havenot yet been clarified. What are the tax implications of the compensation offered to the transmission affected landowners? Does that differ if you sign a voluntary agreement or have an easement compulsorily acquired? Will these payments affect your business for the life of the project, and many years following? What about insurance liability – as farmers we generally have a \$20 million public liability insurance policy but the projects we are being forced to neighbour are worth hundreds of millions of dollars –

what if there is an accident and a fire originating on our property damages infrastructure valued at more than the worth of our policy? Will we lose everything? These are just a few of the questions we need answers to prior to any infrastructure being approved or constructed.

A lack of early community consultation saw the naming of the main CWO REZ energy hub the Merotherie Energy Hub. This has caused distress for the owners of the property Merotherie and we have repeatedly requested this be changed but we are yet to achieve this minor milestone. I believe this speaks volumes for what little impact our feedback has had to date. The main access to the energy hub is via Merotherie Road, 1.7km of which is Talbragar River flood plain. Floodwater currently comes up, crosses the flood plain and subsides without serious and long lasting disruption to agricultural activity. Upgrades with culverts and other engineering solutions will cause flooding upstream and intensify and concentrate flows downstream which will result in significant erosion, a reduction in available agricultural land and create new drainage lines and artificial water courses. There is absolutely no doubt that any engineering solutions will always impact the natural environment. Secondary roads being upgraded to create access for wind and solar developments will also impact the whole catchment's water courses. The Talbragar River flows into the Macquarie River near Dubbo which impacts the Macquarie Marshes and other significant environmental areas. The health of the river system is paramount! The run off from 1200ha of solar panels, (a non-porous surface) at the Birriwa Solar Farm, along with the run off from solar installations at Elong Elong, will flow into the catchment of the Talbragar River causing greater flows downstream. According to the flood risk management manual (NSW DPE) "flooding results in significant risk to many communities across New South Wales. This risk stems from human interaction with flooding through the occupation and use of floodplains. Floodplains are strategically managed for the sustainable long-term benefit of the community and the environment, and to improve community resilience to floods. NSW Government infrastructure providers are responsible for considering the need to avoid causing an increase in the threat to personal safety and to property and avoid any unwarranted increase in potential damage to public property and services, and the impacts of flooding on the emergency management requirements of the community when planning new utilities or transport infrastructure." As it is "human interaction within the floodplain" that is the stem of the cause, wouldn't it appear that remote sites, requiring this access, are inappropriately being considered for this development?

There are many CWO REZ community members and Australians spending countless hours reading documents, writing submissions, researching projects and lobbying elected representatives in an attempt to better educate themselves and protect rural and regional NSW, and Australia. I would be interested to gather data on how many sheep have died due to worm burdens or flystrike, markets have been missed for the sale of commodities, how many kilometres of fencing is waiting to be repaired or replaced and how many terse words have been aimed at loved ones due to the burden the CWO REZ and energy transition has placed on farmers, landowners and affected communities. All the time we put in is voluntary, time we are not achieving anything for our farms, businesses or families.

Rural and regional volunteers are spread very thin so assistance for our communities needs to come in the form of 'boots on the ground' support which could facilitate in building capacity and allowing our communities to prosper and thrive into the future.

As I'm sure you are both aware there is an enormous population range of towns and villages within the CWO REZ. While there are some councils more willing to listen and work with all their ratepayers than others, there is genuine concern that if the infrastructure projects are approved in this area the financial benefits will be taken to the larger towns or cities in our LGA's, and the smaller communities facing the most serious impacts will not benefit accordingly. Monetary incentives are very attractive when you don't have to deal with the consequences.

Minister and Treasurer, this group of people is gathered here today because we believe our land, community and region is worth fighting for; we don't want to see it become an industrial landscape. I sincerely urge you to reconsider the "rapid transition to renewable energy", the cost of which is too great for the environment, agriculture and rural and regional NSW. We need a measured and balanced solution to powering the nation; one that doesn't place the whole burden on those who have, and given

the opportunity will continue to, care for the environment and feed and clothe our growing population. We respectfully request that the government pause all aspects of the energy transition, including compulsory acquisition for the CWO REZ transmission project and all project assessment and applications until there are better solutions in place for those most affected by this plan. We may be small, but we are mighty, and we are incredibly passionate about agriculture, our properties, our communities and rural Australia. While you, as Minister for Climate Change, Energy, the Environment and Heritage, work to save what is most important to you and your portfolios, please work with us and help preserve what is most important to our community.

Emma Bowman

Correspondence

MINISTER SHARPE

21st April 2023

The Hon. Penny Sharpe, MLC,
Minister for Energy,
Parliament House,
Macquarie Street,
Sydney NSW 2000

Dear Ms Sharpe,

I am a landholder in the Dunedoo district writing to you to express my deep concern regarding the push for renewable energy projects in regional areas. Our property lies within the Orana Renewable Energy Zone and although we have not been approached to host either a solar or wind installation and are not under the path of the proposed transmission lines, we will have direct line of sight to a lot of these projects. I am not opposed to renewable energy (we have installed an off grid solar installation to power our entire property), but I am dead against it taking over valuable farming land.

I have attended a number of meetings with EnergyCo and solar and wind proponents and it seems the cart has been put before the horse in the planning of these projects. EnergyCo estimates there will be 5000 workers at peak construction in this district (but according to EIS's and scoping reports the proponents estimate a total over 7200); with no current plan on where to house them or where the water they need will be sourced. Only a few years ago all the towns in this area were under very strict water restrictions due to drought, and we are facing another dry and hot summer, so I can't see townsfolk being happy to share their water, or farmers their stock water if it happens to get dry during the construction phase.

The proposed site for the Merotherie Energy Hub is inappropriate. Access to the site traverses 1.7km of flood plain, which is planned to be upgraded to an 'all weather' road. Any engineering solutions used to achieve this will impact the flow of the Talbragar River flood water and cause major implications both upstream and downstream decimating the river health and causing major impacts to agricultural land due to erosion and changing water courses.

Dunedoo, and all the surrounding towns, already have inadequate access to medical services; what will adding thousands of workers do to our wait times to see a doctor and the backlog of patients in the Dubbo and Mudgee emergency departments?

The regional road network is in disrepair, at best, and can't handle the current traffic load. Our councils haven't got enough staff to carry out the badly needed repairs so I can only imagine if these projects go

ahead what state they will be in. The OSOM loads being moved from the Newcastle Port to the west can't even fit over the Denman Bridge; a major stumbling block!

Employers in this area are already having difficulty finding staff; where will all the workers for the proposed projects come from and who will fill the gaps left in the agricultural sector?

In 2017 the Sir Ivan bushfire burnt 55000ha in the Coolah, Cassilis and Dunedoo district. A lot of aerial assistance was used to save property and eventually bring the fire under control. I wonder how many pilots would fly in an area with high voltage power lines and wind turbines? The number of trees that were saved during Sir Ivan and have been replanted since, that are in danger of being removed for proposed transmission lines is criminal and would not be tolerated by anyone but a government organisation.

Power should be generated where it is to be used. Surely with some government incentives there could be enough power produced and stored in our major cities to cater for themselves (think of all the roof space in the industrial areas) rather than a small percentage of the population bearing the brunt for the whole state. The footprint made, from rebuilding major and minor roads to cater for oversize loads to transporting materials and everything in between, to build large solar and wind factories in regional areas and transfer power to cities, against the flow of current infrastructure, does not seem very "green" to me.

These projects are not only unsightly but they are tearing communities apart, pitting neighbour against neighbour, parents against children, all for the sake of wanting to earn an easy dollar and appeasing the environmental conscience of those who don't have to see or hear them. A lot of the hosts are absentee landholders who won't have to live with the day to day drawbacks of these eyesores.

The stress the 'consultation' phase is having on farmers is catastrophic. The disrespect and disregard shown to landholders from companies like EnergyCo is unacceptable. The secrecy and deception needs to be stopped.

As a fifth generation farmer, on both sides, I am devastated to think of the future, or lack thereof, for farming in Australia if renewable energy takes over. I implore you to come to the district and see what damage the wind and solar installations and power lines will do to our agricultural land and communities before it is too late.

Yours sincerely,
Emma Bowman

NB: The same letter was sent to The Hon. Tara Moriarty – 21st April 2023, The Hon. Chris Bowen – 24th September 2023, The Hon. Catherine King – 24th Septmeber 2023, Mr. Greg Combet – 24th September 2023, The Hon. Paul Scully – 3rd October 2023, Mr. James Griffin – 22nd October 2023, The Hon. Peter Dutton – 31st October 2023

From: DPI NSW Agriculture Mailbox

Subject: Re: Letter to The Hon. Minister Tara Moriarty, MLC, Minister for Agriculture, Minister for Regional NSW & Minister for Western NSW - renewable energy in regional NSW

Date: 9 May 2023 at 4:06:46 PM AEST

To:

Cc: DPI NSW Agriculture Mailbox

Good afternoon Ms Bowman,

Thank you for your recent correspondence to The Hon. Minister Tara Moriarty, MLC, Minister for Agriculture, Minister for Regional NSW & Minister for Western NSW regarding renewable energy in regional NSW. The Minister has passed along your correspondence to the Department of Primary Industries, Agriculture division, and asked us to respond on her behalf.

If you have any further enquiries relating to this specific matter you will find the details of a contact person within the attached letter.

Regards

Agriculture division

NSW Department of Primary Industries

Sensitive – NSW Government

Department of Primary Industries
Department of Regional NSW



Ref: MF23/705

3 May 2023

Ms Emma Bowman

By email:

Dear Ms Bowman

Thank you for your letter of 21 April 2023 to the Hon. Tara Moriarty, MLC, Minister for Agriculture and Regional NSW expressing concerns regarding renewable energy projects in the Dunedoo district. Minister Moriarty has asked me to reply on her behalf. I have also forwarded your letter to the Department of Planning and Environment (DPE) for their consideration.

The NSW Government is carefully considering the policy settings to ensure NSW has a secure supply of energy whilst balancing the needs of our important agriculture sector.

The NSW Agriculture Commissioner established a cross agency task force that included representatives from Regional NSW, the Department of Planning and Environment, Investment NSW and EnergyCo and undertook consultation to inform his Report: [Renewable energy generation and agriculture in NSW's rural landscape and economy – growth sectors on a complementary path](#). As part of his review, the Commissioner considered the impact of the developing renewable sector on localised issues such as housing and jobs.

In late 2022, DPE released a revised [Large-Scale Solar Energy Guideline](#). This revised guideline increases the considerations for assessing, avoiding, and managing impacts associated with large-scale solar energy developments. It also requires social and economic impact assessments to specifically consider many of the issues you have raised in your letter.

I hope this is of assistance, however, if you have any further enquiries, I have asked Mrs Selina Stillman, Acting Manager Agricultural Land Use Planning to be available to answer any questions you may have. Mrs Stillman can be contacted on [redacted]

Yours sincerely,

Kate Lorimer-Ward

Deputy Director General, Agriculture
NSW Department of Primary Industries

From: Ministerial Correspondence Mailbox

>

Subject: A reply to your correspondence to the Minister for Energy, Minister for Climate Change, Minister for the Environment and Minister for Heritage – MD23/1664

Date: 30 May 2023 at 3:50:41 pm AEST

To:

Dear Ms Bowman

I refer to your correspondence to the Minister for Energy, Minister for Climate Change, Minister for the Environment and Minister for Heritage, the Hon Penny Sharpe MLC regarding the Orana Renewable Energy Zone (REZ). Your correspondence was referred to the Energy Corporation (EnergyCo NSW) and I have been asked to reply.

Thank you for your letter about the Central-West Orana REZ and for sharing your concerns about potential impacts from proposed projects in your area, particularly around impacts to agricultural land and cumulative impacts from renewable energy projects. I appreciate you bringing these concerns to our attention.

EnergyCo recognises that developer interest in energy resources may often coincide with agricultural land uses, potentially increasing competition in some areas within the REZ. The NSW Government released a report in March 2023 which outlines its response and recommendations following a review by the NSW Agriculture Commissioner into issues and opportunities resulting from the growth in the renewable energy and agriculture sectors. Further details about the review can be found on the Department of Primary Industry's website at dpi.nsw.gov.au/agriculture/lup/nsw-agriculture-commissioner.

As Infrastructure Planner for the REZ, EnergyCo has developed the study corridor for the REZ transmission project to minimise impacts to high value agricultural land as much as possible. This includes developing a revised study corridor in early 2022 to minimise impacts to sensitive land uses along the Merriwa Cassilis Plateau. To help mitigate visual amenity impacts from new transmission infrastructure, the project is being designed so that transmission lines are located away from nearby residential dwellings.

All major renewable energy projects are subject to detailed assessment and community consultation requirements under the *Environmental Planning and Assessment Act 1979*. The NSW planning system provides strict standards and guidelines that set out performance measures to protect the environment and the amenity of local residents. Planning requirements for solar and wind projects are provided in the Department of Planning and Environment's Wind Energy Framework and Large-scale Solar Energy Guideline which include relevant provisions for managing visual amenity and other impacts to dwellings.

I appreciate that cumulative impacts from renewable energy projects are a key concern for communities in the Central-West Orana REZ. In its capacity as Infrastructure Planner for the REZ, EnergyCo has carried out an extensive program of research since mid-2022 to inform how impacts and benefits will be coordinated in the REZ. These investigations include a number of priority topics for councils and communities, including workforce accommodation, social infrastructure and services, training and employment and road upgrades. A [research summary report](#) was released in March 2023 outlining EnergyCo's investigations to date, and an implementation plan is in development which will outline the strategy and framework for various community benefit initiatives and for the REZ. We expect to announce the details of the plan in mid-2023.

I appreciate community concern about the risk of bushfires in the region following the damage caused by the Sir Ivan bushfire in 2017 and acknowledge the discussion of this issue in the Coolah, Cassilis and Dunedoo communities. I would like to reassure you that bushfire risk in the Central-West Orana region

is a key consideration for EnergyCo in the planning of the REZ transmission project. The transmission lines will be built to withstand most bushfire conditions and will not prevent aerial firefighting activities from being carried out, as they are generally clearly visible from the air. Further details about potential bushfire risks and proposed mitigation measures will be provided in the project's Environmental Impact Statement. Information about living and working near transmission line easements can be found online in our [fact sheet](#).

Regarding the uptake of renewable energy in urban areas, I can advise that distributed energy resources (DER), including rooftop solar, are expected to more than double by 2030 under the Australian Energy Market Operator's 2022 Integrated System Plan and the NSW Government has programs targeted at increasing the uptake of rooftop solar power systems. This will play an important role in meeting a proportion of the future energy mix. However, large-scale energy generation projects in the REZ are critical to ensuring an affordable, clean and reliable electricity supply for energy consumers as the state's five existing coal fired power stations close.

Further information about the Central-West Orana REZ can be found at energyco.nsw.gov.au/cwo, including an interactive map, project documents and more.

If you have any further questions about this issue, you can contact EnergyCo's community team for the Central-West Orana REZ on 1800 032 101 or at cwo@energyco.nsw.gov.au.



Energy Corporation
of New South Wales

www.energyco.nsw.gov.au

From: Emma Bowman

Subject: CWO REZ Transmission Project EIS

Date: 7 October 2023 at 3:32:41 PM AEDT

To:

Dear Minister Sharpe,

I have contacted you previously regarding my concerns about renewable energy projects in the Dunedoo District. We are currently trying to wade through the nearly 8000 pages of Central West Orana REZ transmission project EIS, which the proponent had months, if not years to prepare, and we get 28 days to read and prepare our submissions. In my opinion, this is outrageous! EnergyCo has had countless experts to delve into each subject, while we, mostly farmers, who are busy trying to run our businesses, have to digest the lot, unpaid!

I have so far been through Technical Paper 13 - Traffic and Transport. A couple of things have come to my attention that I feel need more information supplied than EnergyCo is willing to divulge. Of most concern to me is the following statement

Based on the assessments below, upgrades to relevant intersections on Merotherie Road, Spring Ridge Road and other intersections would be required to ensure safe construction access. It is to be noted that these upgrade works would be completed as part of a separate works package and Review of Environmental Factor (REF) process carried out by EnergyCo. EnergyCo intends to assess and determine the road and intersection upgrades under Division 5.1 of the *Environmental Planning and Assessment Act 1979* to allow these time critical works to be determined and commence construction prior to the determination of the CSSI application. However, the road and intersection upgrades are also included in

the EIS so that in the event they are not determined under Division 5.1, they can be approved under the CSSI application.

I understand that a public authority does not need consent from the road authority to exercise their functions in, over or on an 'unclassified' roads. Does this mean that EnergyCo is just waiting for whichever approval comes through first to commence these road works?

Of most concern to me at this time is the section of Merotherie Road from the Golden Highway to the Merotherie Energy Hub. 1.7km of this road is a floodplain. Water currently comes up, crosses the flood plain and subsides without serious and long lasting disruption to agricultural activity. To make this road accessible in all weather would mean installing culverts and other engineering solutions which will cause flooding upstream and intensify and concentrate flows downstream, resulting in significant erosion, a reduction in available agricultural land and create new drainage lines and artificial water courses. This is not to mention the construction of a new bridge over the Talbragar River. There is only one mention of it in the above mentioned Technical Paper, and no mention of how this construction would take place ie. would Merotherie Road be closed?

Technical Paper 13 also states that the "Merotherie Road was inaccessible during the time of survey due to a major flooding event which resulted in no traffic volumes recorded on the road". Does that point not raise red flags about the suitability of the site for an energy hub?

I have noted that all of the local roads listed have been rated at 1000 vehicles per lane per hour. This makes the construction traffic impact look minor, but if you came to inspect these roads you would find that they would not stand up to their rating, and the extra 25-75 vehicles per lane per hour will have a major impact. Most of these roads are classified as bidirectional two-lane roads with 100km/h speed limits. There are a large number of these roads that require one, or both, passing vehicles to pull off the road to avoid a collision, and are not capable of handling vehicles driving at 100km/h.

I would like to invite you to come and see our area for yourself so you can see what impact being landed in a renewable energy zone will have on our district. I am aware everyone needs to do their bit for powering the country but the proposed amount of wind, solar and transmission projects in our community is devastating.

Yours sincerely,

Emma Bowman

From: Mina Nestorovski

Subject: MDPE23/3274 - Correspondence from NSW Department of Planning and Environment

Date: 2 November 2023 at 8:56:23 AM AEDT

To:

Dear Ms Bowman,

Please see the attached correspondence from Clay Preshaw, Executive Director Energy, Resource & Industry Assessments, NSW Department of Planning and Environment.

Regards,

Mina Nestorovski

**Executive Assistant to
Anthony Witherdin, A/Executive Director Key Sites and Regional Assessments
A/Executive Assistant to
Clay Preshaw, Energy, Resource & Industry Assessments
NSW Planning | Department of Planning and Environment**

4 Parramatta Square, 12 Darcy Street Parramatta NSW 2150

Department of Planning and Environment



Ref: MDPE23/3274

Ms Emma Bowman

2 November 2023

Subject: Central-West Orana REZ Transmission project (SSI-48323210)

Dear Ms Bowman

Thank you for your correspondence to the Hon Paul Scully MP, Minister for Planning and Public Spaces, about the Central-West Orana REZ Transmission project. The Minister asked me to respond on his behalf. I note you also wrote to the Hon Penny Sharpe MLC, please accept this as a response to both enquiries.

I note your concerns about potential impacts on local farmland and the community. The Environmental Impact Statement for the project is now on public exhibition, and so it is the right time to provide your feedback via a formal submission.

Community consultation is an important part of the planning process and I encourage you to take the opportunity to make a submission during the public exhibition. The Department of Planning and Environment has extended the exhibition period from 28 days to 42 days to provide the community an extended opportunity to respond. The exhibition period will now conclude on Wednesday 8 November 2023.

After the exhibition period, the proponent, EnergyCo, will be asked to provide a response to issues raised by the community and stakeholders in their submissions.

The Department will then conduct its own detailed assessment of the proposal in line with the NSW Government's policies and guidelines. This includes conducting site visits, seeking advice from relevant government agencies and consulting with residents to fully understand their concerns.

For information on the project and to make your submission please visit <https://pp.planningportal.nsw.gov.au/major-projects/projects/central-west-orana-rez-transmission>.

Should you have any questions, Nicole Brewer, Director, Energy Assessments, at the Department can be contacted on _____ or _____

Yours sincerely

**Clay Preshaw
Executive Director
Energy, Resources and Industry Assessments**

NB: Above also sent to The Hon. Jenny Aitchison – 19th December 2023

From: Sharpe Office Email
Subject: FW: 2023-1922 - Central West Orana Renewable Energy Zone
Date: 22 December 2023 at 9:38:51 AM AEDT
To:

OFFICIAL

Thank you for your meeting request to the Hon Penny Sharpe MLC, Minister for Climate Change, Minister for Energy, Minister for the Environment and Minister for Heritage.

As you will appreciate, the Minister receives a significant number of requests and is unable to accept them all. I have referred your correspondence to EnergyCo for consideration and appropriate action.

Thank you again for contacting the office of the Hon Penny Sharpe MLC

Regards

Office of the Hon Penny Sharpe MLC
Minister for Climate Change
Minister for Energy
Minister for the Environment
Minister for Heritage
Leader of the Government in the Legislative Council
52 Martin Place
Sydney NSW 2000

From: Sharpe Office Email
Subject: Correspondence from Ms Trish Doyle MP – MD23/8402
Date: 21 May 2024 at 11:26:47 AM AEST
To:

Dear Ms Bowman and Mrs Edwards,

Please find attached correspondence from Ms Trish Doyle MP.

Regards,

Office of the Hon Penny Sharpe MLC
Minister for Climate Change
Minister for Energy
Minister for the Environment
Minister for Heritage
Leader of the Government in the Legislative Council

OFFICIAL

OFFICIAL

Trish Doyle MP
Parliamentary Secretary for Climate Change
Parliamentary Secretary for Energy
Parliamentary Secretary for the Environment
Parliamentary Secretary for Heritage



MD23/B402

If you have any further questions about this issue, you can contact Emma's community team for the Central-West Orana REZ, on 1

Thank you for taking the time to bring these matters to the Government's attention.

Sincerely,

Trish Doyle MP
Parliamentary Secretary for Climate Change
Parliamentary Secretary for Energy
Parliamentary Secretary for the Environment
Parliamentary Secretary for Heritage

Dear Ms Bowman and Mrs Edwards

Thank you for your email regarding the Central West Orana Renewable Energy Zone (REZ) and the release of the Draft Energy Policy Framework. I appreciate you bringing this matter to my attention. I note you also wrote to the Minister for Climate Change, Minister for Energy, Minister for the Environment and Minister for Heritage, the Hon Penny Sharpe MLC and other Ministers on this matter.

Firstly, thank you for outlining your concerns regarding the draft Energy Policy Framework and the Central-West Orana REZ transmission project. I am advised that in February the Minister for Energy and the Treasurer met with Ms. Bowman and other residents in Central-West Orana. The Minister's office has continued engaging stakeholders with a view to minimising impacts, maximising benefits, and ensuring that issues such as those raised in your letters are addressed. The most immediate concerns were focused on a deadline for documents to be submitted to the Valuer General. This was acted on and an extension of three weeks secured. A desire to have input into the Just Terms Act was also expressed and the Minister for Energy is working with the Minister for Lands and Property to ensure rural and regional areas are engaged in the current review. Views were also expressed in relation to EnergyCo's engagement style. The Minister's office worked with EnergyCo to improve and presently this in-principle negotiated agreement rate for the Central-West Orana transmission project is ninety-six percent, a state leading figure.

The development of the Central-West Orana REZ is a key part of the Electricity Infrastructure Roadmap, which sets out the NSW Government's plan to modernise our electricity system and deliver reliable and affordable electricity for the people of NSW into the future. Feedback from the community, as well as Government and stakeholder engagement, and ongoing development of the design and construction methodology of the project have informed key changes to the project. These changes have been described and assessed in an Amendment Report which is also published on the NSW Planning Portal.

As you know, the Energy Corporation of NSW (EnergyCo) has been appointed as the Infrastructure Planner for the Central-West Orana REZ and is responsible for developing the transmission network solutions needed to deliver the Government's energy policies and enable the development of new renewable energy and storage projects. I have instructed them to provide Ms Bowman and Mrs Edwards with a detailed response to the items specific to their functions.

As work on the Central-West Orana REZ progresses, there will be further opportunities for stakeholders and the local communities to be involved in the process.

52 Martin Place Sydney NSW 2000
GPO Box 5341 Sydney NSW 2001

02 7225 6000
www.rez.nsw.gov.au

1

OFFICIAL

2

From: Emma Bowman

Sent: Monday, 27 January 2025 12:19 PM

To: Tim Lang

Subject: Fwd: Request for meeting - CWO REZ transmission project

Hi Tim,

Please find below forwarded email to ACEREZ CEO Mr Trevor Armstrong.

I have requested a meeting with Mr Armstrong and the new CEO of EnergyCo, not for the first time, to discuss, primarily, the planned upgrade of the Merotherie Road for the CWO REZ transmission project. You will read in the attached meeting notes what David Seis and I, with the assistance of other local landowners, have proposed, and the decision that was reached by ACEREZ regarding that proposal.

I am writing to you because I think Minister Sharpe needs to be made aware of what is happening, on the ground in the CWO REZ, and to request your assistance in making this meeting happen as soon as possible. I also wondered if Minister Sharpe would be involved in this meeting given her statements about how local landowners and communities should be treated throughout this process?

I look forward to hearing from you.

Kind regards,
Emma Bowman

From: Tim Lang
Subject: RE: Request for meeting - CWO REZ transmission project
Date: 30 January 2025 at 12:28:17 PM AEDT
To: Emma Bowman

OFFICIAL

Hi Emma,

I had a think about the best way to have this issue resolved and believe the Energy and Water Ombudsman of NSW is the right port of call. Government allocated a \$1.3 million grant o expand their remit last year to cover this infrastructure. I followed up and have confirmed the scope extends to aspects such as access roads.

Kind regards,

Tim

Tim Lang (*he/him*)

Advisor – Energy

Office of the Hon Penny Sharpe MLC

From: Emma Bowman

Subject: Re: Request for meeting - CWO REZ transmission project

Date: 30 January 2025 at 9:20:55 PM AEDT

To: Tim Lang

Hi Tim,

Could you please confirm that you took this issue to the Minister herself, and requested her presence to attempt to solve this issue?

I appreciate that issues such as this are within the remit of the Energy and Water Ombudsman of NSW, but I am not sure why I would go through their complaint system, and waste more valuable time, when EnergyCo is accountable to Minister Sharpe?

Regards,

Emma

MINISTER SCULLY

21st November 2023

The Hon. Paul Scully, MP
Minister for Planning & Public Spaces,
Parliament House,
Macquarie Street,

Sydney NSW 2000

Dear Mr Scully,

I have written to you previously regarding my concerns surrounding the Central West Orana Renewable Energy Zone (CWO REZ) and its potential impacts on the communities within its boundaries.

Inhabitants of the CWO REZ have been bombarded with scoping reports, Environmental Impact Statement (EIS) exhibition periods, and now the Draft Energy Policy Framework. During the last quarter of 2022 there were 6 projects on exhibition, all overlapping, from 20th September to 15th December. There were then three projects exhibited during early to mid 2023 and another four in the last quarter of 2023, including the CWO REZ Transmission project consisting of 7910 pages. There are three more projects expected to be on display by the end of this year. How are local community members expected to read and respond adequately to all of this information as well as maintaining our farms, small businesses, full time employment and commitments to our families? The short answer is, we can't! I don't believe the Department of Planning is placing enough emphasis or importance on the knowledge that can be provided by locals; it is critical information desktop modelling will never produce. With that in mind I believe you, as Minister for Planning, should be placing more emphasis on the timing of exhibition periods specifically for renewable energy projects so if the transition must go ahead, it will be done correctly, not just 'rapidly'!

As I'm sure you're aware the Draft Energy Framework Policy was released on 14th November 2023. Another nearly 300 pages for individuals to read and respond to. On 20th November the "suitable areas for wind energy development" was simply 'swapped' for an updated map, changing the legend and a note stating "unmapped areas are not necessarily unsuitable for wind energy development. The map is based on existing and planned transmission at the time of publication and is subject to change over time." I am yet to find any media release regarding this change so I ask, will those who have already made a submission regarding the Draft Energy Framework Policy be alerted to this change and given a chance to amend/update their submission?

My understanding of the exhibition process is to provide all individuals ample opportunity to provide feedback on guidelines prior to their implementation. It is vital that this process remain impartial and transparent to allow all opinions are taken into account. In my mind changing the aforementioned map without acknowledgment removes any transparency or impartiality in this particular instance, and makes me consider the integrity of this process. Is the wind suitability map the only change?

I respectfully request of you, in your capacity as Minister for Planning, as a matter of urgency, to suspend the exhibition period for the Draft Energy Framework Policy until all correspondence as to why the previously mentioned change occurred is made public.

Yours sincerely,
Emma Bowman

MINISTER AITCHISON

From: Emma Bowman
Subject: Central West Orana REZ road upgrades
Date: 12 November 2023 at 3:59:00 pm AEDT
To:

Dear Minister Aitchison,

I am writing you to express my concern regarding the Central West Orana Renewable Energy Zone and its potential impacts to the farming communities that inhabit it. I am a fifth generation farmer running a portion of my families original land located just east of Dunedoo with my partner and the help of my retired, but very active, parents. We run sheep and cattle and do some cropping on our 2500 acres. Our property is not currently directly impacted by transmission lines but there is the possibility we will be directly impacted in the future.

The CWO REZ was thrust upon us with no consultation. Since then landholders have been treated very poorly by EnergyCo when negotiating the proposed routes through their properties. There has been deception, withholding of information and bullying. Landowners have been treated with disrespect and disregard throughout the whole process to date.

One of my biggest concerns at this time is the possible upgrade to roads in the Dunedoo district. Especially the Merotherie Road, 1.7km of which is a flood plain. EnergyCo proposes to upgrade this section of flood plain with culverts and other engineering solutions and replace the bridge that traverses the Talbragar River. In my opinion upgrading this section of the road will destroy the Talbragar River system. I would like to invite you to visit the landholders surrounding this section of road and hear their concerns.

The CWO REZ Transmission project EIS exhibition period closed 8th November. The documents totalled 7910 pages and originally the public was given 4 weeks to read and respond. Through lobbying this period was extended to 6 weeks but that still was not enough time for most people to read the documents in their entirety. EnergyCo had experts take months if not years prepare these documents.

One thing of concern I found in the EIS is the following statement:

Based on the assessments below, upgrades to relevant intersections on Merotherie Road, Spring Ridge Road and other intersections would be required to ensure safe construction access. It is to be noted that these upgrade works would be completed as part of a separate works package and Review of Environmental Factor (REF) process carried out by EnergyCo. EnergyCo intends to assess and determine the road and intersection upgrades under Division 5.1 of the *Environmental Planning and Assessment Act 1979* to allow these time critical works to be determined and commence construction prior to the determination of the CSSI application. However, the road and intersection upgrades are also included in the EIS so that in the event they are not determined under Division 5.1, they can be approved under the CSSI application.

This leads me to believe that local councils will not have any input in what happens to our local roads.

I have also noted that all of the local roads listed have been rated at 1000 vehicles per lane per hour. This makes the construction traffic impact look minor, but if you came to inspect these roads you would find that they would not stand up to their rating, and the extra 25-75 vehicles per lane per hour will have a major impact. Most of these roads are classified as bidirectional two-lane roads with 100km/h speed limits. There are a large number of these roads that require one, or both, passing vehicles to pull off the road to avoid a collision, and are not capable of handling vehicles driving at 100km/h.

I would like to invite you to come and see our area for yourself so you can see what impact being landed in a renewable energy zone will have on our district. I am aware everyone needs to do their bit for

powering the country but the proposed amount of wind, solar and transmission projects in our area will devastate our communities.

Kind regards,
Emma Bowman

On 10 Jan 2024, at 10:56 am, Aitchison Office Email wrote:

OFFICIAL

Good morning Emma,

Your meeting request is best suited to The Hon Penny Sharpe – Minister for Climate Change, Minister for Energy and Minister for the Environment. I have forwarded your meeting request to her office.

Kind regards

Nikki

Nikki Jones
Administration and Liaison Advisor
Office of the Hon Jenny Aitchison MP
Minister for Regional Transport and Roads

W: nsw.gov.au

MINISTER JACKSON

From: NSW Government
Sent: Monday, March 4, 2024 3:36 PM
To: Jackson Office Email
Subject: Central West Orana Renewable Energy Zone Mental Health

Title	Miss
First name	Emma
Last name	Bowman
Phone	
Email	

Street address	
Suburb	
State	NSW
Postcode	2844
Subject	Central West Orana Renewable Energy Zone Mental Health
Type of enquiry	Comment
Message	<p>Dear Ms Jackson & team,</p> <p>We write to you today in your capacity as Minister for Mental Health to raise the major concerns we have for our communities, Dunedoo and Coolah, which are part of the Central West Orana Renewable Energy Zone (CWO REZ), and all other communities that have found themselves surrounded by proposed renewable energy projects.</p> <p>Our general concerns about the CWO REZ were outlined in the previous correspondence sent to you in November 2023. Since that time, we have been working tirelessly in an attempt to inform and prepare our communities, and the greater public, about the potential cumulative impacts of the CWO REZ.</p> <p>Last week a group of concerned community members released a short, anonymous survey to capture the mental health impacts the CWO REZ has had on the affected communities to date; something we believe EnergyCo, as the infrastructure planner of the NSW REZ's, should have already done considering they have been made aware of these concerns on multiple occasions (eg. EnergyCo CRG meeting April 2023 https://www.energyco.nsw.gov.au/sites/default/files/2023-05/cwo-rez-meeting-minutes-crg-apr-2023.pdf (see attached screenshot) and correspondence between EnergyCo and NSW Farmers Association Dunedoo Branch from November 2023 to February 2024).</p> <p>The results of the survey are attached. It would be remiss of us to attempt to summarise the results but there has been a wide range of ages and locations involved, with nearly 75% of people experiencing strained relationships with family and/or friends and neighbours and 80% being affected by a renewable energy project. There are also some very concerning symptoms being endured by individuals from anxiety and increased stress to anger outbursts, increased violence in the home, suicidal tendencies and thoughts of harming others. A number of survey respondents suggested the thing that would help their mental health the most would be the cessation of the CWO REZ and 83% of people are concerned about the mental health of their family, friends and/or community members.</p> <p>We found these results particularly frightening and distressing, and believe there needs to be immediate action taken to assist our communities to better cope with the rollout of "the rapid transition to renewable energy" if it must continue in the current manner and at such a pace. We have no doubt the treatment by both EnergyCo and private developer staff toward community members has compounded an already difficult situation; having your property and district declared a REZ without your knowledge or consent comes as quite a shock! Over the past couple of years questions have been asked and concerns raised by countless community members to EnergyCo and private developer staff without adequate answers, only exacerbating the</p>

anxiety and frustration felt about the situation we are being forced to face.

We respectfully request that you, Ms Jackson, as Minister for Mental Health, consider what measures can be taken, both immediately and in the longer term, to ensure that our communities do not pay the ultimate price of losing any individual through "the rapid transition to renewable energy".

We are prepared to do whatever we can to assist you, on the ground in the CWO REZ, with what measures need to be undertaken in an effort to protect the welfare of our communities, and any others that may be affected.

Yours sincerely,

Emma Bowman
& Sal Edwards

I would like a response	Yes
Privacy Collection Notice	NSW government Privacy Statement: Agreed

NB: Above also sent to The Hon. Ryan Park – 4th March 2024

From: Jackson Office Email

Subject: RE: Central West Orana Renewable Energy Zone Mental Health

Date: 4 March 2024 at 4:10:08 PM AEDT

To:

OFFICIAL

Good afternoon,

Thank you for your correspondence and taking the time to write to the Hon Rose Jackson MLC, Minister for Water, Housing, Homelessness, Mental Health, Youth, and the North Coast.

The matter raised falls within the responsibility of the Hon Penny Sharpe, Minister for Energy and Minister for Environment who is best placed to respond to your enquiry. To ensure you get a response as quickly as possible, we have forwarded your correspondence to their office for response.

Kind regards,

Office of the Hon Rose Jackson MLC

Minister for Water, Housing, Homelessness, Mental Health, Youth and the North Coast

Ph: | **E:** office@jackson.minister.nsw.gov.au

JAMES GRIFFIN, MEMBER FOR MANLY, SHADOW MINISTER FOR ENERGY, CLIMATE CHANGE AND THE ENVIRONMENT

From: ElectorateOffice Manly <ElectorateOffice.Manly@parliament.nsw.gov.au>

Subject: Sharpe Ministerial Response

Date: 16 May 2024 at 5:18:20 PM AEST

To:

Dear Emma,

Please see attached correspondence received by Mr Griffin from Minister Sharpe in relation to the letter of representation he sent on your behalf some months ago.

If there is anything else Mr Griffin could do to help, please don't hesitate to ask.

Kind regards,

Chester Fitzhardinge

Electorate Officer

Office of James Griffin MP, Member for Manly

Shadow Minister for Energy and Climate Change

Shadow Minister for Customer Service and Digital Government

Manly Electorate Office, Shop 2, 2 Wentworth Street, MANLY, 2095, Phone: (02) 9976 2773

OFFICIAL

OFFICIAL

The Hon Penny Sharpe MLC
Minister for Climate Change, Minister for Energy,
Minister for the Environment, Minister for Heritage,
Leader of the Government in the Legislative Council



MD23/5/17

Mr James Griffin MP
Member for Manly

By email: manly@parliament.nsw.gov.au

Dear Mr Griffin *James*,

Thank you for your letter on behalf of Ms Emma Bowman about the potential impact of renewable energy projects on farmers and farming land. I appreciate you bringing her concerns to my attention. Ms Bowman also wrote to me on this matter, and I ask that this be accepted as a response to all correspondence.

Firstly, thank you for outlining Ms Bowman's concerns regarding the Central-West Orana Renewable Energy Zone (REZ) transmission project, and its potential incremental and cumulative impacts.

The development of the Central-West Orana REZ is a key part of the Electricity Infrastructure Roadmap, which sets out the NSW Government's plan to modernise our electricity system and deliver reliable and affordable electricity for the people of NSW into the future.

In February the Treasurer and I met with Ms. Bowman and other residents in Central-West Orana. My office has continued engaging stakeholders with a view to minimising impacts, maximising benefits, and ensuring that issues such as those raised in your letters are addressed. The most immediate concerns were focussed on a deadline for documents to be submitted to the Valuer General. This was acted on and an extension of three weeks secured. A desire to have input into the Just Terms Act was also expressed and I have worked with the Minister for Lands and Property to ensure rural and regional areas are engaged in the current review. Views were also expressed in relation to EnergyCo's engagement style. We worked with EnergyCo to improve and presently the in-principle negotiated agreement rate for the Central-West Orana transmission project is ninety-six percent, a state leading figure.

While a halt to projects is not under consideration, we are committed to working constructively and hope that the actions described here give credence to this.

If Ms Bowman has any further questions about these issues, she can contact EnergyCo's community team for the Central-West Orana REZ, on 1800 032 101 or at cwo@energyco.nsw.gov.au.

Thank you for taking the time to bring this matter to my attention.

Penny Sharpe MLC
Minister for Climate Change, Minister for Energy,
Minister for the Environment, Minister for Heritage

13/5/24

ROY BUTLER, MEMBER FOR BARWON

From: Mel Manchee
Subject: Ministerial Response
Date: 6 June 2024 at 2:05:38 PM AEST
To:

Good Afternoon,

Please see attached correspondence from the Minister's office

Kind Regards,

Mel Manchee
Senior Electorate Officer – Narrabri
Office of Roy Butler MP, Member for Barwon
E
W www.roybutler.com.au

The Hon Paul Scully MP
Minister for Planning and Public Spaces



Ref: MDPE24/924
Your Ref: RB06041

Mr Roy Butler MP
Member for Barwon
Suite 1
60 Maitland Street
NARRABRI NSW 2390
barwon@parliament.nsw.gov.au

Dear Mr Butler *Ray*

Thank you for your correspondence on behalf of Miss Emma Bowman about the Birriwa Solar Farm (SSD-29508870).

I acknowledge the concerns Miss Bowman raised about the Land Use Conflict Risk Assessment (LUCRA) undertaken for the project and appreciate her taking the time to write to you.

I can advise that a LUCRA was submitted as part of the Environmental Impact Statement for the original development application of the Birriwa Solar Farm project. This was a requirement of the Secretary's Environmental Assessment Requirements (SEARs) for the project. This was publicly exhibited along with all other relevant project documents between 14 October and 10 November 2022.

The project was subsequently amended to include a workers accommodation facility where an additional LUCRA was undertaken as part of the amendment report. The amended report and supporting documents were publicly exhibited between 6 October and 19 October 2023.

Both the original LUCRA and the additional LUCRA are available for viewing on Major Projects on the NSW Planning Portal at: www.planningportal.nsw.gov.au/major-projects/projects/birriwa-solar-farm.

I note that the Department has also been in further contact with Miss Bowman to discuss the project and other matters. Should Miss Bowman have any questions, Iwan Davies, Director, Energy Assessments at the Department can be contacted on 02 9274 6296.

Thank you for bringing this to my attention.

Yours sincerely

Paul Scully MP
Minister for Planning and Public Spaces

52 Martin Place Sydney NSW 2000
GPO Box 5341 Sydney NSW 2001

4/6/24
nsw.gov.au/ministerscully

Australian Government

Large-scale Renewable Energy Target

According to the DCCEE website “The Large-scale Renewable Energy Target (LRET) incentivises investment in renewable energy power stations such as:

- wind and solar farms
- hydro-electric power stations.

These power stations can create large-scale generation certificates (LGCs) for the eligible renewable electricity they produce. They can sell LGCs to liable entities (mainly electricity retailers) or companies who want to demonstrate renewable energy use for voluntary purposes.

Liable entities must purchase a certain percentage of electricity from renewable sources each year. They comply with this by buying LGCs and surrendering them to the Clean Energy Regulator.

The LRET aims to deliver 33,000 gigawatt hours of extra renewable electricity each year.”

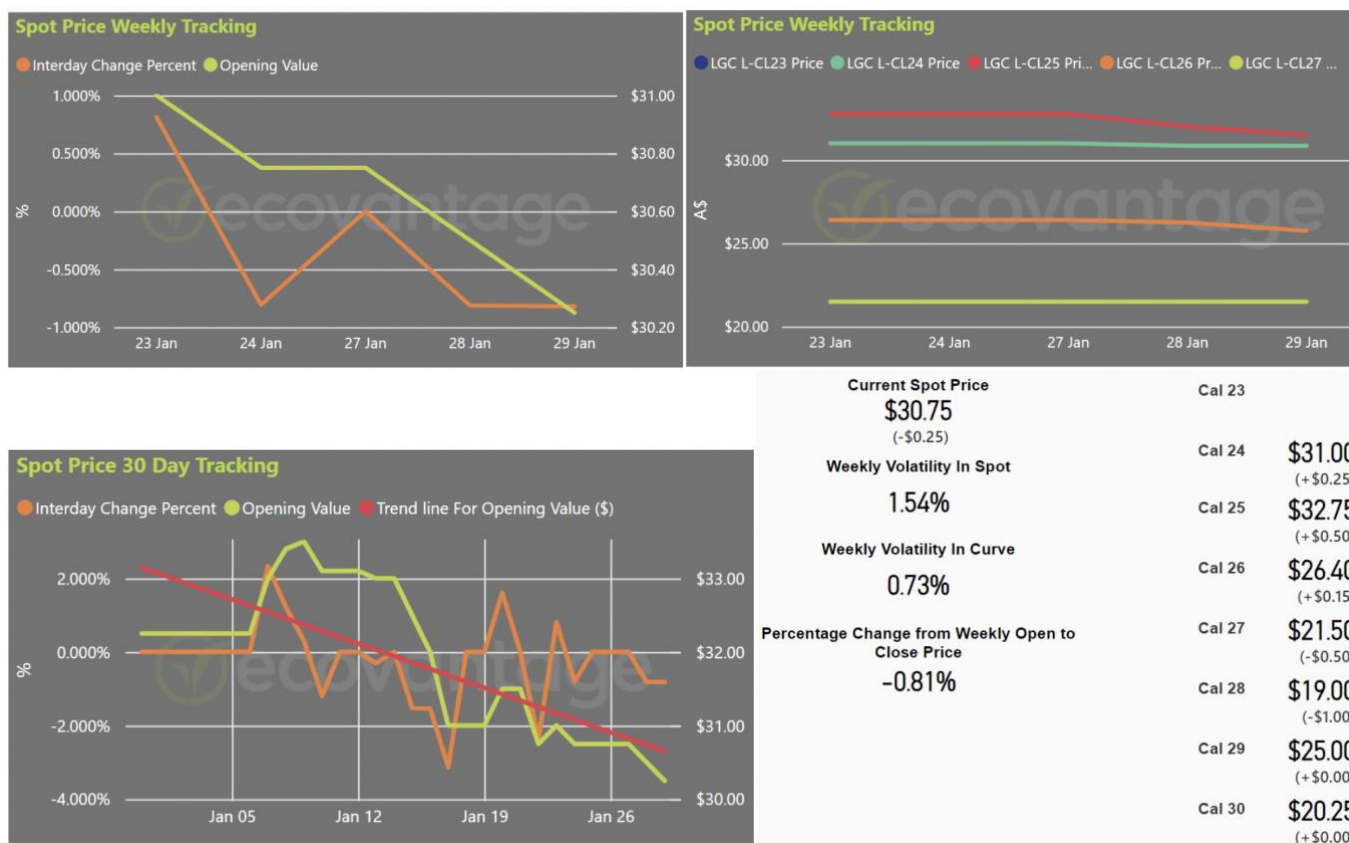
The following was sourced from the Australian Government Clean Energy Regulator website:

“LGCs are tradable certificates created for eligible large-scale renewable energy power stations. The certificates represent the amount of renewable energy generated by these facilities.

An LGC is equal to 1 megawatt-hour (MWh) of renewable electricity generated or displaced by a power station.”

The below market update information was obtained from Ecovantage – Australia’s Large-Scale Generation Certificate Specialists:

LGC Market Update



Although not as lucrative as when I first started following the price of large-scale generation certificates, \$30 per mWh of energy produced, when a project such as Spicers Creek Wind expects to generate two million mWh per year is a lot of money (\$60m). Are these “incentives” really necessary and/or a good financial decision for the Australian economy? Are schemes like this driving foreign, multi-national companies to invest in renewable energy infrastructure in Australia and take our wealth out of the country without paying taxes?

Warrumbungle Shire Council

Overview

The Warrumbungle Shire Council has a population of 9,225 (according to the 2021 Census) and covers an area of 12,380 square kilometres.

From the Warrumbungle Shire Council website:

“The Warrumbungle Shire is strategically positioned on the Newell Highway mid-way between Brisbane and Melbourne. A number of highways and main roads traverse the shire providing links with surrounding regional centres.

The landscape ranges from extensive plains to undulating hills, from the high basaltic plateau of the **Coolah Tops** in the east to the rugged mountainous peaks of extinct volcanoes in the **Warrumbungle National Park**, west of Coonabarabran.

The geography, flora and fauna of the Shire is where east meets west. The mountainous terrain of the Great Divide gives way to rolling hills then the inland plains. The flora and fauna of the wide open plains mix with coastal animal and vegetation progressively across the Shire. A striking example of this is on the eastern boundary of the shire we have the large grey kangaroo and on the western boundary of the shire the large red kangaroo.

The shire is also a meeting place for the nations of our traditional owners and custodian of the land. The northern part of the shire is home to the Gamilaraay people while the southern part of the shire is home to the Wiradjuri people. Also the nations of the Weilwan and Kawambarai (Werriri) come into the Shire on the western border. The history, traditions and culture are being recognised as an important part of the Shire’s history.

The stunning night skies, formed by a combination of low pollution, very low humidity and limited cloud cover have drawn astronomers and researchers to Coonabarabran in their search for what lies beyond the confines of the visual night sky.

Siding Springs Observatory, located 25kms from Coonabarabran is the site of a number of internationally owned and operated optical telescopes where major research has recorded amazing truths of the universe, supporting Coonabarabran’s claim to the name “Astronomy Capital of Australia”.

The towns and villages of the shire comprise Coonabarabran, Baradine, Binnaway, Coolah, Dunedoo and Mendooran; all provide wonderful opportunities to experience real country Australian lifestyles. Each of the communities has their own special claim to fame. Bush Poetry Festivals, rivalry over ownership of the name The Black Stump, a Steamrail Village, The Oldest town on the Castlereagh, The Gateway to the mighty **Pilliga** or the Astronomy Capital of Australia – each of our villages reflects the personalities of its residents and the lifestyles.

The shire was traditionally built on agricultural pursuits with the early establishment of wool growing and beef cattle production followed by cereal cropping and today a burgeoning vine growing and horticultural industry.

The communities enjoy the services of quality schools and health services. The shire boasts a broad range of cultural, sporting and recreational activities.

Retailing in each centre provides services to those communities and the provincial centres of Tamworth and Dubbo, located within 2 hours of the centre of the Shire complements local level services.

Correspondence

Coonabarabran:

14-22 John Street
Coonabarabran NSW 2357

PO Box 191
Coonabarabran NSW 2357

ABN: 63 348 671 239



Calls from within Shire
1300 795 099

Calls from outside Shire area
Coonabarabran:
02 6849 2000

Coolah: 02 6378 5000

Fax: 02 6842 1337

Email:
info@warrumbungle.nsw.gov.au

Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

Please address all mail to:
The General Manager

Please refer enquiries to: **C Knight**
Doc ID 208656

20 December 2024

Ms Emma Bowman

Dear Ms Bowman

Request for Information – Lawson Park Solar Project

Warrumbungle Shire Council has received a request for information under the *Government Information (Public Access) Act 2009* (NSW) to supply information regarding the Lawson Park Solar Project that was request in an email to Council in July 2024.

Please find attached information requested.

Yours sincerely

CLAUDIA KNIGHT
ACTING MANAGER CORPORATE SERVICES

Attachment: Information responding to email sent to Council in July 2024 regarding Lawson Park Solar Project.

DA 19-2023 Assessment Report - Lawson Park Solar

Planners Response to issues raised (copied directly from the assessment report)	Response/Concern/Question	Council's Assessing Officers Response
<p>Conditions of consent relating to additional tree planting on the subject property and the preparation of a landscape plan are recommended to ensure appropriate additional planting is provided.</p> <p>The additional trees to be planted are required by the condition to be mature, meaning that the planting of root stock is not sufficient.</p> <p>Mature does also not mean fully grown. As there are already trees that could be considered fully grown, the planting of additional mature trees will satisfactorily reduce the visual impact of the development from the nearest two residences both now and into the future.</p>	<p>1.1 What is deemed "appropriate additional planting"? Who deems the additional planting "appropriate"?</p> <p>1.2 Is the "satisfactorily reduced" visual impact agreed upon by neighbouring landowners rendering them amenable to the project proceeding?</p> <p>1.3 Will the screening be considered effective from the time of planting? If not, when?</p> <p>1.4 Who decides if the screening is effective?</p>	<p>1.1 The purpose of tree plantings is for visual amenity of neighbours and other external viewers of the solar farm. Appropriate additional plantings are determined through the development of a Landscape Management Plan (LMP) or as a section of the Construction Environmental Management Plan. The Plan will be prepared by the Developer or their environmental consultant and submitted to Council for review and comment. The consultant will use industry standard guidelines such as Guidelines for Landscape and Visual Impact Assessment, 3rd Ed and Guideline for Landscape Character and Visual Impact Assessment (EIA-N04) (Transport for NSW, 2020d) to determine the appropriate mitigation including number, type and position of trees. Council will review the LMP for appropriateness.</p> <p>1.2 The nearest two residences will have the opportunity to be involved in on-going consultation with the Developer throughout the project. This will be potentially through both formal and/or non-formal correspondence. The LMP will deem what is "satisfactorily reduced", in line with current industry Guidelines.</p>
		<p>1.3 The main visual impact of the Project will occur once the majority of solar panels are installed and continue through the operational life of the Project. The Planner has requested mature trees be used for screening purposes due to the short construction phase (approx. 6-months), and need for a level of effective screening within this time frame. As trees grow, it is understandable that the level of screening will increase, therefore, maximum screening will be achieved several years post construction depending on species choice.</p> <p>1.4 The Developer will follow the LMP and self-assess against the criteria within the Plan. The LMP will follow industry Guidelines. The developer will have a Complaints phone number or email address available. Authorised Council officers may periodically assess the project against the Conditions of Consent.</p>
<p>Stormwater runoff from the solar panels will fall onto the natural ground and will predominantly be absorbed into the soil in a dispersed manner.</p>	<p>"CONDITION of the CERTIFICATE Stormwater</p> <p>35. Roof water and water from solar panels shall be directed away from the foundations using appropriate drainage systems, while ensuring it doesn't hinder the natural water flow of the surrounding area.</p> <p>Adequate site drainage should be maintained to reduce moisture changes of underground soil during wet season."</p> <p>Whilst the planner considers stormwater runoff will "predominately be absorbed into the soil in a dispersed manner" the above condition suggests an acknowledgement that run off from the panels will require mitigation.</p> <p>As a general rule, one millimetre of rain over one square metre is equal to one litre of water. Lawson Park Solar is proposing to use 35ha for solar panels. If you consider that 12ha might actually be solar panels, a non-porous surface, 20mm of rain would mean 2,400,000 litres of water not able to disperse evenly into the soil (120,000m² x 20 = 2,400,000 litres). Granted, even without solar panels 20mm of rain in a short amount of time would create</p>	

	<p>surface runoff but water sheets off non-porous surfaces with much more velocity creating potential erosion and sediment issues.</p> <p>2.1 Can Warrumbungle Shire Council staff and councillors, and the applicant, guarantee there will be no erosion or sediment issues that negatively affect any adjoining, or downstream property as a result of the proposed project?</p> <p>Premise's Hydrologic and Hydraulic Assessment of the project states "a catchment area of approximately 345.6 hectares drains through the proposed solar farm site area, which will cover an area of approximately 35 hectares". That run off then flows into the Talbragar River and on to the Macquarie River. Any hazardous substances have the potential to pollute downstream water systems and have negative effects on ecosystems. There are no mitigation measures that will be adequate AFTER an incident has occurred.</p> <p>2.2 Can Warrumbungle Shire Council staff and councillors, and the applicant, guarantee there will not be any contamination attributable to the project?</p>	<p>2.1 Runoff from solar panels has the potential to cause droplet impact erosion, localized to the immediate area of each solar panel. The accumulation of runoff water has the potential to cause rills or sheet erosion if the site has not achieved or maintained 70% ground cover. During construction regular inspections for progressive stabilisation, erosion and sedimentation will be included within the CEMP and will include monitoring and implementing mitigation measures to control any developing issues, as per the requirements of the Consent Conditions. The CEMP will also include an Erosion and Sediment Control Plan which will detail the design of the site, to prevent discharge of polluted waters, in accordance with the NSW Blue Book. The Project is required to comply with the Protection of the Environment Operations Act (POEO) which prohibits the pollution of waters.</p> <p>2.2 The Erosion and Sediment Control Plan will likely include measures to prevent the mixing of 'clean' (before entering the Project site) and 'dirty' (after entering the Project site) water. Industry standard is to construct a hydraulic diversion on the upstream side/s of the Site to direct 'clean' water around the site. Therefore, the bulk of the catchment runoff will not interact with the site or any potential contaminants. This Plan will also include wet weather and flood shut-down procedures, including management of the risk of a pollution event. The Project will develop an Environmental Incident and Complaints Management Plan, which will detail procedures for spill clean-up and remediation. The Project will keep records of incidents and will be subject to external inspections by Councils Authorised Officers.</p>
<p>Only a small part of the subject land is mapped as Biophysical Strategic Agricultural Land (BSAL).</p>	<p>Biophysical Strategic Agricultural Land (BSAL) is, according to the NSW Government, "land with high quality soil and water resources capable of sustaining high levels of productivity." "BSAL plays a critical role sustaining the State's \$12 billion agricultural industry."</p> <p>According to the Department of Primary Industries Agriculture Industry Snapshot for Planning August 2020 states "the Central West Slopes and Plains has the advantage of large areas of unfragmented land that allow the achievement of economies of scale for broadacre agriculture including irrigation. This coupled with suitable soils and water supply, infrastructure as well as access to markets in Dubbo, Orange, Sydney, and Newcastle make the Sub Region one of the most successful and profitable in NSW." The same document also says "future land use planning must recognise the importance of agriculture to society and the economy and that the land and resources on which agriculture depend need to be protected and managed to enable continued use of the land for agriculture" and, "land use planning needs to recognise that it is not only agricultural land with excellent biophysical characteristics that needs to be retained for agricultural purposes, but also those key secondary supporting industries which may be located on lower quality agricultural land which are still potentially impacted by encroaching non-agricultural land uses."</p> <p>The aforementioned document also declares there is a "need to protect land for its future productive capacity particularly where there is a combination of biophysical assets such as water, topography and soils. The Central West Slopes and Plains Sub Region supports high value agriculture now and will be important to sustain production of more specialised agricultural and horticultural enterprises into the future."</p> <p>Any loss of agricultural land, especially for decades, will be detrimental to the industry. The cumulative effect the CWO REZ</p>	

	<p>proposed projects will have on the Dunedoo, Cassilis, Coolah, Elong Elong, Gulgong district (due to the cluster of proposed wind, solar and transmission infrastructure) has the potential to devastate both the agricultural industry and the rural communities and businesses that rely on it.</p> <p>3.1 Will Warrumbungle Shire Council staff and councillors, and the applicant, guarantee there will be no financial or social losses to the local community or farmers and landowners due to impacts caused by the proposed project and therefore the cumulative impacts of the CWO REZ as a whole (given every project will contribute to the cumulative impacts of the CWO REZ)?</p>	<p>3.1 The CWOREZ has been declared by the State Government. WSC is not in a position to provide guarantee's regarding future potential financial or social impacts caused by the cumulative impacts of the REZ projects. WSC has consistently engaged with DPHI and Proponents to raise the concerns of the local community and object to Projects where it is felt these concerns have not been adequately addressed. WSC is doing all we can to advocate for the local community.</p>
<p>The proposed use is temporary, is not defined as an industrial activity and will not prevent the future use of the land for agricultural purposes.</p> <p>(Issue raised previously) The assessment uses the term temporary regarding the land use for the solar farm. Temporary isn't 25 years.</p> <p>A solar farm is not a permanent development of land. The infrastructure placed on the land will be removed at the end of its life and the land returned to agricultural use. For this reason, the use is considered temporary.</p>	<p>Temporary is defined as being "lasting for a limited period of time; not permanent". Whilst the project is not currently proposed to be permanent, 25 years is not a short period of time, and there is the possibility of the applicant, or another developer applying to extend the use of the solar installation on the project site.</p> <p>Industrial is defined by the Cambridge dictionary as in or related to industry (eg an industrial landscape or industrial expansion) and (of a size or an amount) very large. I believe a solar installation of the size proposed by the applicant would be defined as industrial. It is my understanding that land occupied by solar installations currently rated by Council as farmland will change to business rating signifying the shift from primary production to a more factory type land use.</p> <p>4.1 When the solar infrastructure is removed, following the 25 year operation period, how will the applicant ensure the land is productive, and contributing to the agricultural industry, immediately following decommissioning?</p> <p>4.2</p> <p>4.3 Will Warrumbungle Shire Council conduct testing, during construction, operation and following decommissioning, to ensure there are not or have been no adverse impacts to water and soil caused by the solar project?</p> <p>4.4 Will any soil and water test results be conducted by an independent body and the results be made publicly available?</p>	<p>4.1 A Decommissioning Plan will be prepared prior to the issue of a Construction Certificate, and a separate development application submitted to Council for demolition and decommissioning. The Decommissioning Plan will include all requirements to comply with the Conditions of Consent, which may include a Sampling and Analysis Plan, material reuse or recycling and remediation or rehabilitation. This Plan will be submitted to Council for approval prior to issue of a Construction Certificate.</p> <p>4.2 An Authorised Officer appointed may enter the site for the purposes of the administration and enforcement of any Act, regulations or local laws which relate to the functions and powers of the Council. If there was cause for the Authorised Officer to enter, they may attend site and conduct an investigation. The Projects approved CEMP and Site Soil and Water Management Plan will outline any monitoring requirements to achieve the objectives of the WSC CoCs and Development Control Plan. Due to the projects activities it will not have monitoring requirements under any Environmental Protection License (EPL).</p> <p>4.3 The Project Site Soil and Water Management Plan will detail the requirements for sampling,</p>
		<p>analysis and reporting. The Construction Certificate will not be granted until WSC have approved all Plans. WSC is likely to require all sample analysis to be performed by a NATA accredited laboratory. These results will be available at all times, on-site for an Authorised Council Officer to review at any time.</p>
<p>The subject land is within the Renewable Energy Zone and will be returned to agricultural land at the end of the development's lifespan.</p>	<p>The subject land being located within the Central West Orana Renewable Energy Zone is not adequate justification for the proposed project. Unless Warrumbungle Shire Council has been misleading its ratepayers, the Council, not unlike the general public, was not consulted prior to the declaration of the CWO REZ which is unlawful conduct by the NSW Government. The Energy Infrastructure Investment Bill 2020 states in Part 4, Division 1, Section 19 (4) The Minister may make a declaration only if the Minister (b) has considered the following (iii) the views of the local community in the renewable energy zone.</p> <p>5.1 How were Warrumbungle Shire Council staff and councillors made aware of the draft CWO REZ declaration at the time it was exhibited by the then DPIE, now DPHI?</p> <p>During the exhibition period of the draft CWO REZ declaration there were six submissions received - three from renewable energy developers, two from public authorities and one from an organisation - not one from a member of the public suggesting</p>	<p>The Central West Orana REZ was formally declared on 5th November 2021. The Community Reference Group was established in August-2022 and included Councillor Kathy Rindfleisch from WSC and several community members. The first meeting of the CRG was September 2022, at which EnergyCo advised what the CWO-REZ was and why it was identified as the first REZ under the Electricity Infrastructure Roadmap. Community consultation had already been completed prior to this meeting. Therefore WSC was not consulted prior to the declaration of the REZ.</p>

	<p>there was little to no information available to community members regarding the potential declaration. The CWO REZ has been forced upon Warrumbungle Shire Council and its communities and should not be used as evidence to support any proposed infrastructure projects.</p> <p>5.2 Did Warrumbungle Shire Council make a submission to the aforementioned draft CWO REZ declaration? If so, did WSC object or support the draft declaration?</p> <p>5.3 How have Warrumbungle Shire Council staff and councillors conducted research to gauge the sentiment of WSC ratepayers with regard to the CWO REZ and renewable energy projects?</p>	<p>5.2 No, WSC did not make a submission to the declaration</p> <p>5.3 WSC has held regular community consultation meetings where Council staff have answered questions regarding the CWO REZ and projects. Council staff have held many meeting with Proponents of Renewable Energy Projects, where community feedback to Proponents has been discussed. WSC staff have diligently reviewed all community submissions for this Project in preparing its assessment report.</p>
The issues of repair of damaged panels and the potential redundancy of solar power are not relevant to the assessment of the development application.	<p>6.1 Why is the issue of the repair of damaged panels not relevant to the assessment of the development application?</p> <p>Damaged panels (ie. hail damage, fire, storms, ageing etc) are a potential consequence of the development application approval and should therefore be considered and mitigated. A plan should be made in case of such an instance to prevent possible soil and water contamination and/or illegal burial/dumping of waste.</p>	<p>6.1 The repair of damaged panels is a management issue for the operator of the solar farm. The application identifies that regular maintenance of the solar farm will be undertaken. The disposal of unrepairable panels will be addressed through the Waste Management Plan, which will be approved by Council prior to issue of the Construction Certificate. Any potential soil contamination will be managed through the Incident and Complaints Management Plan and Waste Management Plan. The Project must comply with the POEO Act, to prevent off-site migration of contamination.</p>
The potential impact on property values is not a relevant planning matter. In any case, there is no evidence to suggest that the proposal will result in the devaluation of any property.	<p>The impact of Lawson Park Solar on adjoining or district property values should be relevant to the planning assessment as it is another potential consequence of the projects' approval and construction. If these issues are not thoroughly investigated by Council prior to approval and construction I believe Council would be legally liable for impacts realised following construction.</p> <p>7.1 What research did the planner, and other Warrumbungle Shire Council staff and/or councillors, do to come to the conclusion that "there is no evidence to suggest that the proposal will result in the devaluation of any property"?</p>	<p>7.1 The planner's job is to assess a development application having regard to the details submitted by the applicant, relevant development standards, controls and guidelines and issues raised in submissions. Issues raised in submissions need to relate to planning matters relevant to the proposed development application. The potential impact of a development on property values is not a planning matter that requires specific research to determine whether a concern about impact on property values is valid or not.</p>
A condition of development consent is recommended to require a separate development application to be submitted to Council for decommissioning of the development.	<p>8.1 Will Warrumbungle Shire Council staff and/or councillors require the separate development application for decommissioning of the project be submitted prior to construction and operation?</p> <p>If the site is developed, as suggested, but becomes unviable or invaluable and is abandoned by the applicant, the project is sold on to another company or the applicant files for bankruptcy –</p> <p>8.2 What assurance will Warrumbungle Shire Council have that the project site will be decommissioned and rehabilitated to an acceptable standard to allow the land to be used for agricultural production in the future?</p> <p>8.3 Do Warrumbungle Shire Council staff and councillors consider it necessary to have documented assurance from the applicant, and any potential future owners, to ensure decommissioning will actually take place?</p> <p>8.4 Why does Warrumbungle Shire Council not require, as a condition of decommissioning, the removal of all underground project infrastructure?</p>	<p>8.1 No, the DA for decommissioning can be submitted at any time during construction or operation. A development consent lapses 5 years after it has been granted, if no works have commenced. Therefore, it is assumed that the DA for decommissioning will be submitted within 5 years of planned decommissioning.</p> <p>8.2 The Development consent granted for decommissioning will be based on the submission of an impact assessment and will include conditions commensurate with the land being rehabilitated to a suitable standard.</p> <p>8.3 Reports submitted with the development application which are identified in the conditions of developments provide documented assurance that decommissioning will take place. It would be a breach of the development consent and the Environmental Planning and Assessment Act 1979 if decommissioning did not take place. Council could take legal action against the developer and/or the land owner to achieve compliance with the conditions of development consent.</p> <p>8.4 The removal of underground project infrastructure will be decided upon between the Project Owner and land owner at the time of decommissioning. The land owner has the ultimate authority when it comes to the state in which the property is left after decommissioning.</p>
The property description used for notification included the address of the property and the legal description and the application documents clearly	<p>I do not believe the subject property name is "Talbragar Park" and is therefore misleading to members of the local community and very distressing for the owner of "Talbragar Park", Dunedoo located on the Golden Highway.</p>	<p>9.1 The property is Lot 78 DP754309 (otherwise known as 126 Lawson Park Road, Dunedoo). It has not been identified as Talbragar Park within the SEE, therefore I believe this name is incorrect.</p>

identify the location of the subject land on maps.	<p>9.1 Is the address of the project correct on the provided documentation? If not, could the address of the proposed project please be clarified?</p> <p>The visual assessment provided by Premise on behalf of the applicant shows photomontages from only residences or farm infrastructure. There are no photomontages from any other vantage points on the most directly impacted properties nor elevated positions in the district that will have a full view of the project.</p> <p>10.1 Could the planner please clarify how the impacts on neighbouring and other local landowners were assessed specifically regarding the views from other locations on their properties?</p> <p>I also note Premise's document states "it is considered that the scenic quality values visible in the photomontages provided in Attachment A are of low scenic quality (i.e. large expanses of flat or gently undulating terrain and indistinct, dissected or unbroken landforms that provide little illusion of spatial definition or landmarks with which to orient)." I acknowledge this comes from the Department of Planning and Environment (now DPHI) August 2022 Technical Supplement yet I would have hoped Warrumbungle Shire Council would place more value on the scenic attributes of the LGA, as its residents do. Yet another guideline that does not adequately consider the values of the local landowners and community members.</p> <p>10.2 How would Warrumbungle Shire Council staff and councillors rate the scenic quality of the region?</p> <p>The photomontages provided in the Response to RFI document are very clumsy and clearly distorted.</p> <p>10.3 How has the accuracy of the photomontages provided been investigated by Warrumbungle Shire Council staff and councillors?</p>	<p>9.2 As above</p> <p>10.1 The Visual Impact Assessment follows the Industry Standard assessment outlined within Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline (DPE, 2022). This is considered appropriate. The sensitivity of view points was assessed according to table 2 within the Memo (Premise, Response to Request for Further Information), which is taken from the Guideline. The methodology used is;</p> <ul style="list-style-type: none"> • identify all viewpoints from public roads and rail lines within 2.5 km of the proposed development • identify other public and private viewpoints within 4 km of the proposed development • calculate the distance of each of these viewpoints from the nearest point of the proposed development • determine the 'relative height difference' between the proposed development and each viewpoint • plot each viewpoint on the Preliminary Assessment Tool – Vertical Field of View to determine the indicative vertical field of view (as either 1, 2, 3 or 4+ degrees) • measure the worst-case horizontal field of view of the project from each viewpoint (not considering topography or vegetation) • compare the vertical and horizontal fields of view using the matrix in Table 1 of the Technical Supplement to determine whether detailed visual assessment of each viewpoint is required. <p>The result of using this methodology was 1 view point classified as Low and the remaining three as</p>
		<p>Very Low.</p> <p>10.2 The scenic quality when assessed for renewable energy development is classified in terms of the methodology with the Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline (DPE, 2022). Assessment utilizing the industry standard Guideline is considered to be 'best practice' for visual amenity assessment.</p> <p>10.3 WSC has relied upon the professionalism of the contracted environmental consultancy and verified the appropriateness of the VIA.</p>

<p>An acoustic assessment was provided with the development application. The assessment acknowledges that some nearby residences will be affected by noise during construction, however the extent of the impact is low (i.e. less than 5dBA) and the period of impact is short-lived (being six months with a peak period of two months). It is not appropriate to require agreements to be reached between parties on issues such as noise impacts. The planning system provides for assessments to be undertaken, consultation with</p>	<p>11.1 Do Warrumbungle Shire Council staff and councillors believe it is acceptable that nearby residences will be subjected to six months of construction noise impacts?</p> <p>Whilst the planner suggests the period of impact is "short-lived" and it may well adhere to the current guidelines I believe it is not fair, nor just, that those directly affected do not get adequate input regarding the impacts to their lives, homes, and businesses. The planner also states "it is not appropriate to require agreements to be reached between parties on issues such as noise impacts". Is that due to the potential for no directly affected landowners or community members being willing to sign such an agreement therefore rendering projects, such as Lawson Park Solar, unapprovable?</p> <p>11.2 The assessments required to be undertaken by the planning system are paid for by the applicant; how can Warrumbungle Shire Council guarantee an unbiased assessment, and that impacts will not be more severe than assessed?</p>	<p>11.1 Construction noise impacts have been predicted to be of minor intrusiveness, through a predictive model using best practice methodology for this type of development. Throughout construction the developer will be required to comply with the approved Noise and Vibration Control Plan and the approved construction hours of:</p> <p>Monday to Friday (inclusive) - 7.00am to 6.00pm Saturday – 7.00am to 1.00pm No works are to be carried out on a Sunday or Public Holiday</p> <p>The Project has also been conditioned to ensure construction noise does not exceed an Laeq (15 min) of 5dB(A) above background noise at the boundary of the Project Property. This will be monitored by the Developer with records available to Councils authorized officer at any time. There will also be a publicised complaints contact for the developer and complaints can be submitted to Council.</p> <p>An increase of 5dB(A) over background noise is roughly equivalent to a whisper and considered barely audible. This level of increase over a 15min Laeq will be practically inaudible.</p> <p>11.2 WSC used both in-house and external subject matter experts to review all documents submitted with this Development Application and referred the application to the Regional Planning Panel for determination, to ensure adequate assessment and oversight. Impacts described within an Impact Assessment (SEE) are always a prediction and will be verified and managed during construction and operation.</p>
<p>potentially affected landowners and assessment and determination by certain bodies such as Council or the Regional Planning Panel.</p>	<p>It is a well documented fact that consultation and engagement undertaken by renewable energy developers, and Government authorities, in rural and regional NSW has been found lacking as evidenced below.</p> <p>The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised.</p> <p>The Community Impact Survey, conducted by Property Rights Australia and NREN, collected 775 responses between Saturday 12th April and Friday 10th May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity.</p> <p>11.3 Are Warrumbungle Shire Council staff and councillors satisfied that the applicant and/or Council has adequately consulted with and taken into account the sentiment of direct neighbours of the project, and the district, regarding the Lawson Park Solar project?</p>	<p>11.3 Yes, the Proposal was advertised on the Planning Portal. All submissions received were included in the Planners assessment, including late submissions. WSC staff also attended several community consultation meetings where they answered questions directly related to this Project.</p>

<p>The Statement of Environmental Effects submitted with the development application states in Sections 3.1 and 5.11.2 that the project will generate 8 heavy vehicles and 12 light vehicle movements per day during the peak construction period (2 months). This is consistent with the data contained in the Traffic Impact Assessment.</p>	<p>The Noise and Vibration Assessment states on page 20: "Construction is expected to be completed over a five-month period and it's anticipated that up to 50 workers would be on-site daily. For assessment purposes it is assumed that only 30% of the 50 workers would participate in some form of carpooling. Therefore, the modelling has assumed an estimated 35 private light vehicles travelling to and from the site daily. Given this, the assessment has considered the potential impacts associated with noise emissions from the maximum expected 35 light and 3 heavy vehicle movements from the site entry along Lawson Park Road."</p> <p>The above is not consistent with what is contained in the Traffic Impact Assessment nor the Statement of Environmental Effects.</p> <p>12.1 Why are there inconsistencies between the submitted reports?</p> <p>12.2 Given this inconsistency, how can the local community be assured the rest of the planning specifics are honest and accurate?</p>	<p>12.1 The traffic numbers used for the noise assessment are higher than those within the Traffic Assessment, therefore actual impact will be lower than predicted.</p> <p>12.2 The existence of an inconsistency between different reports in a development application does not negate the overall assessment of the development application as being well founded and giving proper consideration to the relevant planning matters.</p>
<p>It is considered that this level of traffic is not an enormous increase in traffic and unlikely to pose any significant risk to</p>	<p>The Traffic Impact Assessment states in regard to current traffic volumes that "the survey results indicate Digilah Road currently accommodates a low level of traffic in the order of 10 vehicles per hour". The full survey results presented in Appendix A show there were 22 vehicles counted on the North approach to Digilah Road</p>	<p>13.1 Conditions of consent have been imposed on the development to ensure that the following are undertaken before, during and after the construction of the solar farm, a Construction Environmental Management Plan, Construction Traffic Management Plan, Road Condition assessment, Road Safety Audit (RSA), Security Bond, Maintain roads during construction, Construction Access and Renew Road Pavements by end of Construction Phase.</p>
<p>livestock, families or the school bus.</p>	<p>between 6am and 10am – 10 between 8am and 9am. There were also 22 between 4pm and 7pm. Ten vehicles an hour is an inaccurate and misleading statement!</p> <p>There are no traffic counts available for the new route along the All Weather Road.</p> <p>13.1 Will Warrumbungle Shire Council check the submitted data and request a more accurate report on the current traffic volumes and request a traffic study on the All Weather Road to better understand the current traffic volumes?</p> <p>13.2 What does the planner consider an "enormous increase" in traffic when assessing a quiet, local road?</p> <p>If there are 10 vehicles that traverse the proposed route on an average day, the traffic for project construction will mean a 300% increase. If there are 20 vehicles it's a 200% increase – I would either of those scenarios an enormous increase.</p> <p>13.3 Who will be liable if there is an accident attributed to Lawson Park Solar construction or operation traffic, or as a result of any impacts to the road network due to construction or operation of the project?</p>	<p>13.2 The planner's role is to assess a development application on its merits. The planner came to the view that the proposed traffic generation was not significant given the relatively short construction timeframe.</p> <p>13.3 Road traffic accidents between the construction or operational traffic and the local drivers come under standard road rules and would be a police matter. This includes accidents because of damage to the road network. Drivers must drive to conditions. The specifics of any accident would be assessed at the time by police.</p>
<p>The proposed bushfire conditions require a Bush Fire Emergency Management and Operations Plan to be prepared in consultation with the NSW RFS.</p> <p>Decisions regarding the protection of assets (including dwellings and infrastructure assets) during a bushfire are appropriately made by the NSW Rural Fire Service.</p>	<p>14.1 Will the Bush Fire Emergency Management and Operations Plan be prepared in consultation with "LOCAL" NSW RFS brigades (who will be responsible for any incidents at the project site) or NSW RFS bureaucrats (who have no knowledge of the project area and will likely never set foot on the project site)?</p> <p>NSW Rural Fire Service volunteers, along with private landowners, are the 'boots on the ground' responsible for containing and extinguishing grass and bushfires – a large majority of these people who give up their time and risk their lives are those objecting to renewable energy projects like Lawson Park Solar. There is a very recent history of catastrophic bushfires in the district giving local landowners extensive experience with fire control, and memories of a situation they would rather not repeat.</p> <p>14.2 Will fire fighters be allowed access to the project site at all times (ie. no locked gates)?</p> <p>14.3 What are the risks associated with fighting a fire within a solar installation?</p> <p>14.4 Is smoke from burning solar panels toxic?</p> <p>14.5 Will local RFS volunteers be expected to have solar project fire fighting training?</p> <p>14.6 How much water will be stored at the site for the sole purpose of fire fighting?</p> <p>14.7 Who will be liable for damage caused to neighbouring and other local properties from a fire found to originate within the development site?</p>	<p>14.1 Consultation will be sought by the Developer or their consultant with NSW RFS. NSW RFS will determine the appropriate position/branch to provide advice. WSC must rely on the expertise of NSW RFS in these matters.</p> <p>14.2 14.2 NSW RFS will recommend access requirements, which will be included in the Bush Fire Emergency Management and Operations Plan (BFEMOP). NSW RFS has extensive experience with obtaining access to facilities and properties and WSC will ensure these requirements are included in the Bushfire Risk Management Plan prior to approval.</p> <p>14.3 14.3 The BFEMOP will outline the risks associated with fire around solar installations. WSC will ensure that the BRMP draws on appropriate expertise and incorporates it into mitigation measures.</p> <p>14.4 As above, the BFEMOP will outline the risks and mitigation measures.</p> <p>14.5 The training of RFS volunteers is a matter for the NSW RFS.</p> <p>14.6 The BFEMOP will determine the need for and amount of water stored on site for fire fighting purposes.</p> <p>14.7 Liability from fires originating at the development site is not a planning matter.</p>
<p>The impacts of this proposed development on adjoining landowners have been appropriately considered in the application and in the Council assessment. It is considered that, subject to</p>	<p>15.1 Please explain how "the impacts of this proposed development on adjoining landowners have been considered in the application and in the Council assessment"?</p> <p>I believe there has been no more "consideration" than adhering to the applicable guidelines for solar installations.</p> <p>15.2 What is considered a "significant" impact on an adjoining landowner or property?</p>	<p>15.1 The Statement of Environmental Effects and associated Appendices detail how the impacts have been appropriately considered. This is a local development yet in many cases the SEE has assessed impacts in accordance with Guidelines for State Significant Solar Farms. This means that this Project has undergone a more rigorous assessment than what was required for its CIV and planning pathway. The Planner considered all documented impacts and conducted his own in-person assessment to verify the claims within the SEE and specialist reports.</p>

		<p>15.2 The use of 'significant' is taken from the SEE and specialist reports where the impacts have been reported as 'not significant' for the following; Air quality Ecological impacts Hydrological impacts Social impacts</p> <p>The planner's role is to assess a development application on its merits, having regard to the specialist studies undertaken by experts in their fields. The planner came to the view that the proposal, subject to conditions, would not have a significant impact on adjoining land or property.</p>
<p>conditions, the proposal will have no significant impact on adjoining landowners. Should there be any impacts in the future, landowners can inform Council who can investigate to determine if there has been any breach of the conditions of development consent.</p>	<p>15.3 Who will be responsible for ensuring there have been no breaches of the conditions of consent? 15.4 How often will inspections be carried out to ensure there have been no breaches of the conditions of consent? 15.5 What will be the penalty to the applicant if there is a breach of the conditions of development consent?</p>	<p>15.3 The Developer will implement monitoring to ensure no breaches. Councils authorised officers will also be able to attend site and request evidence of compliance. The general public can submit complaints to the Project or to Council. 15.4 Councils authorised officer will determine the required frequency. 15.5 This will depend on the nature of the breach, the severity and if there has been any material environmental harm. Any breaches will be assessed under the Environmental Planning and Assessment Regulation.</p>
<p>The applicant has advised that there are no significant water requirement during the construction and operation of the proposed development. The only water usage envisaged is for dust management during construction. The recommended condition of consent requiring a Construction Environment Management Plan includes a section on dust management. It is envisaged that the Dust Control Plan will include a requirement for a water cart to be present on-site during construction to mitigate dust in the event of windy conditions. The applicant has also advised that given the negligible volume of water likely to be required, it is considered that this could be obtained from a private water supplier if necessary.</p>	<p>16.1 How many litres is an "insignificant" or "negligible" amount of water? 16.2 What amount of water, even if obtained from a private water supplier, would be deemed by Warrumbungle Shire Council a potential impact to the district it is being taken from? 16.3 How will Warrumbungle Shire Council staff and councillors ensure water is protected for stock and domestic use if construction and/or operation coincides with a period of drought or low rainfall?</p> <p>I do not believe dust only needs to be mitigated in windy conditions. Vehicle movements or soil disturbance creates dust when conditions are dry regardless of wind. 16.4 Do Warrumbungle Shire Council staff and councillors consider "envisaged" a clear enough directive for the applicant to make a water cart being present on site to mitigate dust a requirement?</p>	<p>16.1 In this instance the term 'insignificant' has been used in place of 'low' water requirements. 16.2 WSC is not in a position to comment on this because there has been no cumulative impact assessment and water balance study completed for the entire district or for CWO REZ projects. The implications of the CWO REZ include the drawdown of groundwater and surface water supplies to an unacceptable level, however without a complete cumulative impact assessment including all Projects and Proposals, it is not possible to say what is a quantity of water which will not impact on the local community. 16.3 Construction is for a limited period of 6-months and water use has been assessed to be negligible, therefore further assessment of this is not required. Operational water requirements are even lower than construction. 16.4 Yes, the migration of air borne dust off the Project site boundary is a breach of the POEO Act, Part 5.4 and could potentially result in a fine. Dust is required to be controlled in all weather conditions.</p>
<p>(Issue raised previously) The proposal is not aligned to the LEP Clause 1.2, in particular the aim to encourage the retention of productive rural land for agriculture. The subject land is a relatively small part of a larger rural holding on which agricultural activities will continue. The use of rural land for solar farms is a temporary use and the land can be returned to agricultural activity at the end of the life of the solar farm.</p>	<p>The project site being on productive rural land, regardless of the length time it will be out of service, is NOT following Clause 1.2 of the Warrumbungle Shire Council LEP in encouraging the retention of such land. Retention is the act of retaining something. Retain, according to the Merriam-Webster online dictionary, "implies continued keeping". I do not consider a 25 year absence of this land from agricultural production "continued keeping", nor WSC's approval of the project as aiming to "encourage the retention of productive rural land for agriculture". Regardless of the size, the development of a solar installation on the proposed site does NOT "satisfy the plan objectives" as the planner suggests. 17.1 How does Warrumbungle Shire Council adhere to the LEP if not by following the stated aims?</p>	<p>17.1 WSC believes that, in the assessment of this development application, the aims of the LEP have been met. The aim is to "encourage" retention, not to "require" retention of agricultural land. As the vast majority of the subject property is retained as agricultural land, the aim is considered to be met.</p>

<p>(Issue raised previously) While the Infrastructure SEPP permits the use, it is prohibited in the Warrumbungle LEP. It seems that policies are being utilised when they give the desired outcome. Some clarification around which policies should be followed would be appreciated.</p> <p>Clause 2.7 of State Environmental Planning Policy (Transport and Infrastructure) 2021 states that the provisions of Chapter 2 prevail in the event of an inconsistency with another planning instrument.</p>	<p>Whilst I acknowledge that the State Environmental Planning Policies will prevail over the Local Environment Plan under certain circumstances the planner responsible for the WSC assessment report appears to use policies to give desired outcomes.</p> <p>Stated in the assessment: "State Environmental Planning Policy (Planning Systems) 2021: Chapter 2 Comment: Chapter 2 of this SEPP relates to State and regionally significant development. The proposed development does not meet the triggers in the SEPP for State or regionally significant development. The proposal is therefore local development and this SEPP does not apply." This development was determined by the Western Regional Planning Panel therefore suggesting it is a regionally significant development.</p> <p>See question below.</p>	<p>19.1 This letter has used two different SEPPs to try and argue this point. The reason why different SEPPs apply in some instances and not in others relates to the wording of each SEPP and what it states it prevails over. The SEPP (Planning Systems) does not apply because even though the DA was determined by the WRPP it is still a Local development. The WRPP was asked to determine this DA under s377 of the Local Government Act, as a DA determination that can be delegated to a Regional Planning Panel.</p>
<p>(Issue raised previously) The assessment report states that the development is not regionally significant development and is therefore local development. However, the use is prohibited in the LEP, how can it be local development. As the permissibility comes from the State Policy, shouldn't it be considered regional development.</p> <p>For the subject development, the trigger for regionally significant development is not based on which planning instrument provides permissibility. Rather the trigger for regionally significant development is the capital investment value of the development. Based on the applicant's estimated cost of development, prepared by a qualified Quantity Surveyor, the proposal did not exceed the threshold for regionally significant development.</p>	<p>The planner has stated that "the trigger for regionally significant development is the capital investment value of the development. Based on the applicants estimated cost of development, prepared by a qualified Quantity Surveyor, the proposal did not exceed the threshold for regionally significant development". Yet, the following outcome came from the March 2024 WSC Council Meeting: "Item 23 Development Application (DA)19/2023 260/2324 RESOLVED that Council write to the Chair of the Western Regional Planning Panel seeking the determination of DA 19/2023 for proposed 5MW Solar Farm to be located at "Talbragar Park", 126 Lawson Park Road, Dunedoo by the Western Regional Planning Panel. MOVED: Councillor Hogden SECONDED: Councillor Newton For – Unanimous" This development was determined by the Western Regional Planning Panel therefore suggesting it is a regionally significant development.</p> <p>19.1 How can the SEPP apply in some instances and not in others? 19.2 If there found to be a considerable impact from the construction or operation of the project resulting in a legal battle what is the clear process in identifying which policy applies to this project?</p>	<p>19.2 As above. The author would need to obtain legal advice if she thinks the project has been assessed under the incorrect SEPP.</p>
<p>It is considered that, subject to conditions, the proposal will have no adverse impacts on agricultural activities on</p>	<p>Potential adverse impacts on agricultural activities on adjoining land:</p> <ul style="list-style-type: none"> - bushfire risk and fire fighting limitations - limits to controlled burning 	
<p>adjoining land and the subject land will be returned to agricultural activity at the end of the life of the solar farm.</p>	<ul style="list-style-type: none"> - insurance liability and possible premium increases - water use impacting stock and domestic sources - pollution – water, air and soil - erosion and sediment issues - changes of water courses leading to flooding - increased traffic impacting stock movements, accident risk, delays - noise disturbance <p>20.1 Can Warrumbungle Shire Council staff and councillors guarantee there will be no adverse impacts on agricultural activities on adjoining land as a result of approval, construction and operation of the proposed development? 20.2 Can the project approval be revoked if a serious impact occurs that was not previously accepted as "potential"? 20.3 In the case of damage to any panels, whose responsibility is it to monitor, assess and manage any potential contamination issues? 20.4 Do Warrumbungle Shire Council staff and councillors feel confident that there is no risk of "adverse impacts on agricultural activities on adjoining land", or the wider district as a result of the proposed development?</p>	<p>20.1 WSC has assessed the DA according to the requirements of the planning system. The WRPP have determined the Project after being satisfied that all impacts have been assessed to the fullest extent possible. Impact mitigation will be detailed in the CEMP and Management Plans. The impacts which will be experienced as a result of the Project have been deemed to be acceptable with mitigation measures in place.</p> <p>20.2 Section 4.57 of the Environmental Planning and Assessment Act 1979 outlines the processes for revoking a development consent.</p> <p>20.3 The Developers site personnel will monitor for damage and implement the Incident Response Procedure from the Incident and Complaints Management Plan. The developer is under obligation to report off-site contamination migration to the NSW EPA under the mandatory reporting rules. If Council becomes aware of contamination through an inspection or complaint they may investigate.</p> <p>20.4 Response as per 20.1</p>
SEPP	Response/Issue/Concern	

<p>The proposal will have no direct or indirect impacts on the agricultural use of adjoining land and is therefore considered an appropriate use of the land.</p>	<p>I believe the planner, and Warrumbungle Shire Council staff and councillors should seek out landowners whose properties adjoin existing or solar installations under construction to better understand the potential impacts on adjacent agricultural land. There are those who have had 'all weather' access to their property restricted, a woolshed flooded for the first time in a long history, dams and waterways filled with silt and sediment and erosion all due to changes in velocity and water courses from soil disturbance and inadequate mitigation during construction. There's also those who have watched enormous piles of cardboard and other waste burnt, not recycled or even taken to an appropriate facility. There are landowners whose insurance premiums have increased due to the risk associated with industrial infrastructure.</p> <p>See above question.</p>	
<p>Development Control Plan 2015:</p> <p>Chapter 6 Rural Development Controls: Objectives</p> <ul style="list-style-type: none"> • To protect the amenity of the locality in which the development is situated • To ensure that development preserves and complements any natural and/or cultural 	<p>Response/Issue/Concern</p> <p>I do not believe changing part of the locality from a rural, scenic vista to an industrial solar installation would be classified as "protecting the amenity of the locality". Farming is part of our natural and cultural heritage. There are families farming in the district, and across greater NSW, who owned their land for generations, in some cases over 200 years – that should be considered cultural heritage. Solar developments being built on any agricultural land will "adversely impact upon the existing and future agricultural and rural industry potential of the land and adjoining land".</p>	
<p>heritage characteristics of the area.</p> <ul style="list-style-type: none"> • To ensure that development does not adversely impact upon the existing and future agricultural and rural industry potential of the land and adjoining land. • To protect existing vegetation and corridors, minimizing possible impacts on threatened species, communities, populations or their habitat. <p>Comment: Meets the relevant objective of the Control. In particular, the proposal will not adversely impact upon existing surrounding rural use, or the future rural use of the subject land as at the end of the life span of the development, it will be decommissioned and the land returned to a rural use.</p>	<p>I do not believe the Lawson Park Solar project will require the removal of any vegetation but solar factories do generally impact habitat by removing mature trees. The planner suggests the objectives are met but I believe the above reasoning is enough to raise serious doubts and consider the project unapprovable.</p> <p>22.1 Do Warrumbungle Shire Council staff and councillors value the natural and cultural heritage and amenity of the Dunedoo district?</p> <p>22.2 How will WSC protect the area for those who do value the natural and cultural heritage and amenity of the Dunedoo district?</p>	<p>22.2 WSC has an obligation to all rate payers, including the owner of the land which the solar project is proposed. Council fully investigated the potential impacts of this Project, requesting additional information from the Proponent several times. WSC has also engaged external subject matter experts to assess the provided assessment reports and attend meetings with the Developer and WRPP. Council considers the natural and cultural heritage and amenity of the area in which every development application is proposed.</p>
<p>Likely Impacts</p> <p>Social impact in the locality: There is minimal social impact on the locality of the development. There are a total of 11 residential receivers on rural properties located within 3.25km of the site.</p>	<p>Response/Issue/Concern</p> <p>The guidelines may discern the social impacts to the locality are minimal however I do not believe the feelings of local residents and landowners are adequately represented nor weighted considering it is their lives, homes, businesses and local environment that will be impacted by any potential negative impacts. Social impact is the effect on people and communities that happens as a result of an action or inaction, an activity, project, programme or policy. The social impacts of the CWO REZ have already been immense given the poor consultation and treatment of local landowners affected by the CWO REZ transmission project and the rollout of the REZ as a whole by EnergyCo. The Warrumbungle Shire Council values state: "Compassion – working for the benefit and care of our community and the natural environment. Respect – to ourselves, colleagues, the organisation and the community, listening actively and responding truthfully."</p> <p>23.1 Do Warrumbungle Shire Council staff and councillors consider that the Dunedoo community believes the Lawson Park Solar project will benefit the local people and environment?</p> <p>23.2 Have Warrumbungle Shire Council staff and councillors respected and listened actively to the concerns of Dunedoo community members, especially the 11 residential receivers located within 3.25km of the site?</p>	<p>23.1 This Project, whilst within the REZ boundary is not a State Significant Project. WSC doesn't have the benefit of assessing projects against a cumulative assessment of all REZ projects. There are many benefits from a new infrastructure development in any regional area including jobs and enhancing the local economy. All the CWO REZ renewable energy infrastructure projects are bringing Australia closer towards achieving net-zero by 2025, as required by Climate Change Legislation.</p> <p>23.2 The Proposal was exhibited on the NSW Planning Portal for the required amount of time and Council reviewed all submissions received, including those received late. The concerns raised within these submissions were considered by Council and the Planner, as well as being raised with the WRPP specifically during meetings. The specific concerns raised within each submission was discussed with Council and the WRPP members, who decided that no additional exhibition time was required.</p> <p>23.3 As above</p>

23.3 How have the views of the Dunedoo community been sought and adequately considered?

Condition of the Certificate	Response/Issue/Concern	
Payment of section 7.12 contributions 10. Before the issue of a construction certificate, the applicant must pay a total contribution of \$52,507.87 as calculated at the date of this consent to Council under section 7.12 of the EP&A Act in accordance with Warrumbungle Section 7.12 Contributions Plan. The total amount payable may be adjusted at the time the payment is made, in accordance with the provisions of the Warrumbungle Section 7.12 Contributions Plan.	24.1 Who is responsible for administration and distribution of the funds the applicant will contribute to Warrumbungle Shire Council? 24.2 How will that contribution be spent within the area to benefit those most negatively affected by the Lawson Park Solar project?	24.1 The funds received under the EP&A Act, section 7.12 contributions will be managed in accordance with the WSC Development Contributions Plan. Council maintains separate accounting records for all Section 7.12 Contribution Plans. A condensed version of these records will be available in the WSC Annual Report in accordance with the requirements of the Regulation. Council also maintains a contributions register, available to the public at Council during business hours or online from the Planning Portal. 24.2 Money paid to the Council under a Section 7.12 Contributions Plan is applied by Council towards meeting the cost of the public amenities or services that will be or have been provided within the area as listed in the Works Schedule of Appendix 1 of the WSC Contributions Plan available here Section 7.12 Development Contributions Plan - Warrumbungle Shire Council (nsw.gov.au)

Are community benefits adequate when considering the financial gains made by renewable energy proponents? Is there any equity?

Renewable Energy Target and Large-Scale Generation Certificates

According to the Australian Governments Clean Energy Regulator website "under the Large-scale Renewable Energy Target, large-scale generation certificates (LGCs) are a financial incentive for the generation of renewable energy from a power station". "The Renewable Energy Target (RET) is an Australian Government scheme that aims to reduce greenhouse gas emissions in the electricity sector and increase renewable energy generation."

"Renewable energy power stations, like wind farms or solar farms, create LGCs for each MWh of eligible renewable energy they produce. These certificates can then be sold or traded to entities with liabilities under the Renewable Energy Target (RET), such as electricity retailers. By purchasing LGCs, entities can meet their renewable energy obligations under the RET. LGCs can also be sold to private buyers on the secondary market to meet voluntary corporate ambition."

The Australian Government Department of Climate Change, Energy, the Environment and Water website states that 1kW of solar panels in Sydney will typically generate, on average, 4kWh of electricity daily. This means 1mW of solar panels would be expected to generate 4mWh of electricity per day therefore 5mW of solar panels should generate 20mWh daily. Generation of 20mWh daily = 7,300mWh per year.

As of July 5th, 2024 the spot price for each LGC was \$46.75. At that price the Lawson Park Solar project has the potential to earn the applicant \$341,275.

The applicant will benefit financially from the installation of such a development as a result of the RET's large scale energy generation certificates, plus the sale of electricity into the grid.

25.1 What benefits will be realised by the Dunedoo township, and members of the local community, aside from the owner of the project site, as a result of such a project?

Answer: The local population will benefit from increased employment opportunities and local economic benefits (purchase of local materials, accommodation requirements and living costs of employees) during construction and operation. The Section 7.12 contribution will go towards maintaining or upgrading public services and amenities. After decommissioning the land will be returned to agricultural land use.

Conclusion

When discussing the CWO REZ, Warrumbungle Shire Council staff and councillors are often heard claiming a lack of input and authority given current NSW State Government policy and jurisdiction.

Lawson Park Solar was an opportunity for Warrumbungle Shire Council to set a precedent with regard to renewable energy projects with a capital investment of less than \$5 million within the LGA.

There are countless potential negative impacts due to the Lawson Park Solar project on farmers, the community, local businesses and the environment, as discussed above, that could see Warrumbungle

Shire Council legally liable, as the provider of consent, in the future; especially considering these issues have been flagged as potential by concerned members of the public.

I wonder if the Planner, or any Warrumbungle Shire Council staff involved in the assessment of Lawson Park Solar, or councillors, will be directly impacted by the project, or any other renewable energy project currently proposed for within or adjacent to the CWO REZ? I can assure every member of the Warrumbungle Shire Council staff, and councillors, that being directly affected forces you to consider the real, on the ground, impacts to lives, homes, businesses, the environment and community. I urge all staff and councillors to consider Lawson Park Solar as if it was being proposed next door to your home, on your childrens' school bus route, in your community (causing division and angst), or in your favourite scenic retreat forever ruining what you value most; I wonder if it would still be considered permissible?

Answer: No response required.

Western Regional Planning Panel

Correspondence

-----Original Message-----

From: Emma Bowman

Sent: Tuesday, 28 May 2024 10:12 PM

To: Planning Panels Mailbox

Subject: Western Regional Planning Panel (PPSWES-223)

Good evening,

Could you please advise if all submissions received by Warrumbungle Shire Council relating to PPSWES-223 are available on the Planning Portal? I understand there were originally three submissions made which are able to be viewed via the portal, but an extra four were received by Council following the exhibition period which I cannot find on the portal.

Secondly, if a member of the public is not satisfied with the Planners Responses to community issues raised in the Council Assessment Report what is the process to have these concerns addressed? Should those issues be raised with Council or the Western Region Planning Panel?

Kind regards,
Emma Bowman

From: Planning Panels Mailbox

Subject: RE: Western Regional Planning Panel (PPSWES-223)

Date: 29 May 2024 at 6:23:17 AM AEST

To: Emma Bowman

Hi Emma,

Thank you for your email.

The panel has access to all submissions via the planning portal. They do not get published for privacy reasons.

Council needs to include those in assessment process and address all those concerns and engage with the applicant.

If a member of the public is not satisfied with the Planners Responses to community issues raised in the Council Assessment Report must be sent to Warrumbungle Shire Council as it is council's responsibility to provide an assessment for the panel. It is at councils discretion if they accept extra submissions after exhibition has closed.

The panel cannot directly accept any submissions or material on this or any DA.

If there are less than 10 unique submissions received then the matter will be determined electronically as there is no requirement for a public meeting.

Kind regards

Sharon Edwards (she/her)

Project Support Officer
Planning Panels | Department of Planning, Housing & Infrastructure

www.planningpanels.nsw.gov.au

-----Original Message-----

From: Emma Bowman

Sent: Wednesday, 29 May 2024 11:19 AM

To: Planning Panels Mailbox

Subject: Re: Western Regional Planning Panel (PPSWES-223)

Hi Sharon,

Thank you for your prompt reply.

I just wanted to clarify a couple of points.

The three submissions received by Warrumbungle Shire Council during the original exhibition period are available on the portal, without personal details redacted, so I am somewhat confused as to why the additional four submissions are not publicly available?

I contacted Warrumbungle Shire Council regarding the Planners Responses and was told I needed to make my issues known to the WRPP. I wonder, given the WRPP has made a determination, who is best to raise my concerns about the inadequate planner responses detailed in the Council Assessment Report with?

Kind regards,
Emma

Sent from my iPhone

From: Planning Panels Mailbox

Subject: RE: Western Regional Planning Panel (PPSWES-223)

Date: 29 May 2024 at 11:38:55 AM AEST

To: Emma Bowman

Hi Emma,

As you have advised that the matter has now been determined by the independent planning panel, there is nothing further required from the panel.

Council are responsible for providing the panel with an assessment report and a recommendation. Council are also responsible for issuing a notice of determination. In the first instance, council would be your point of contact to raise your concerns regarding what is included in their assessment report presented to the panel.

In regard to submissions, it is up to council as to whether they publish those submissions and more

importantly ensure that they abide by the privacy act. In some instances, some persons writing a submissions do not wish to have their submission publicly available at all or wish to have it redacted. This would be a query for council as to whether they did actually accept the four late submissions and included them in their assessment report. This is at councils discretion as to how they deal with submissions within councils policies.

If you are unhappy with councils response you then have the option the option to raise an official complaint through councils complaint system.

Failing this and council has not responded to you appropriately, you wish to contact the NSW Ombudsman.

Kind regards

Sharon Edwards (she/her)

Project Support Officer
Planning Panels | Department of Planning, Housing & Infrastructure

www.planningpanels.nsw.gov.au

Dealings with Renewable Energy Developers

Overview

Over the past few years, I have attended countless information and “drop in” sessions run by renewable energy developers with regard to specific projects. These events are primarily held for a couple of hours, often in the middle of the day, despite community feedback to suggest whole day opportunities so as not to inconvenience landowners and community members who would like to learn about, or question certain projects. There has also been a large number of requests for town hall style consultation from developers so all interested parties can hear the concerns and/or suggestions of other community members and the responses given. It seems staff, not unlike EnergyCo, would prefer to converse with landowners and community members one on one – is there a potential reason for this possibly intentional tactic? Divide and conquer? Is it an unwritten rule of executing community consultation with respect to contentious projects?

I have raised innumerable issues and asked a myriad of questions of the staff in attendance at information sessions, most of which have gone unanswered on the day and been taken on notice with promises of contact in the near future to provide additional detail; I do not believe I have ever had follow up contact from a project proponent following a drop in session. Do these gatherings serve solely to tick the community consultation and engagement box and not a genuine opportunity for community members to provide feedback and local knowledge in an effort to lessen any potential negative impacts? At this stage I wonder what the point of conversing with renewable energy developers is – why bother wasting everyones time (especially that of the community considering their time is volunteered!)?

Below I will detail interactions with renewable energy developer employees and the often unanswered questions and unacknowledged emails and phone calls.

Acciona Energia

I first interacted with Acciona staff at the Orana Wind Information Session held in Dunedoo on 17th November 2022. In mid to late 2023 I received a phone call from a neighbouring landowner who had not long had a meeting with Acciona’s Orana Wind Project Manager, Adam Mathers. My neighbour told me Adam had informed him that he had spoken with my father and I regarding the Orana Wind project, which was an outright lie; I, nor my father, had met Adam, nor spoken to him on the phone. Unfortunately, this was a tactic we were becoming increasingly familiar with so I picked up the phone to confront Adam about the matter. I am not sure how many times I attempted to contact Adam before I managed to have a conversation with him (maybe three, and if my memory serves me correctly Adam did not return my calls). When I finally did speak to Adam and informed him that I didn’t appreciate him lying to my neighbours about the fact we had spoken, his response was that my neighbour was mistaken, he meant that we had previously conversed with the project team. Another lie? This interaction certainly did not endear the Acciona team to me, nor change my already poor impression of renewable energy developer staff as a whole.

On the 31st October 2023 I met with Project Manager, Adam Mathers and Community and Stakeholder Engagement Lead (NSW), Louise Johnson regarding the Orana Wind project at the White Rose Café in Dunedoo. We had a reasonable discussion about the concerns I had regarding the project and EnergyCo’s lack of coordination of whole of REZ strategies (ie. accommodation and workforce). When I relayed my issues when dealing with EnergyCo, Adam stated that they weren’t having much more luck than me; he said that anything with EnergyCo “falls on deaf ears”. When discussing Acciona’s upcoming community engagement sessions I suggested town hall style meetings and/or sessions that are not just a few hours but whole days, maybe even two different days in different weeks so as to capture more community sentiment. It seems that feedback fell on deaf ears!

On the 5th December 2023, I attended the Orana Wind drop in session held in the Old Bank Building in Dunedoo. Acciona were clearly not expecting a crowd considering the room they had chosen to hire for the time in Dunedoo no bigger than 5m x 5m. We discussed the usual issues, as well as the massive decrease in turbine numbers for the project, as usual I was disappointed that there were not a lot of adequate answers. Project Director, Adam Mathers, informed me that he doesn't like talking to me because I "ask the hard questions and know too much" – if I wasn't concerned about the project before that point, I certainly was after that comment. Is it ok that a community member could potentially know more about a project than the proponents Project Director?

Since that time Acciona has not held any more community information sessions to my knowledge. I understand since the loss of more than half of the turbines from the original project design Acciona is questioning the feasibility of the project – I understand the project team are also facing issues with neighbouring project landowners not agreeing to the impacts of a significant number of turbines. To that point, I have been told Project Director, Adam Mathers, has been informing potential host landowners which neighbouring landowners are refusing to sign neighbour agreements which is abhorrent behaviour!

Correspondence

-----Original Message-----

From: Emma Bowman

Sent: Wednesday, 1 November 2023 4:53 PM

To: Johnson, Louise

Subject: EXT: Link and suggestions

Hi Louise,

Thank you for your time yesterday. Just a couple of things I have thought of since we met.

Firstly, the link to what I read regarding subsidies paid to wind. Check section 7.53.

https://clicktime.symantec.com/15siFBHqXf4nVyVJxkhFj?h=VwsezuAHafEvw-s9JxVB1bGtD-p06nIGfjKnkfFvOj0=&u=https://www.aph.gov.au/parliamentary_business/committees/senate/wind_turbines/wind_turbines/Final%20Report/c07%23:~:text=3D7.53%2520By%2520any%2520reckoning%252C%2520the%2Ca%2520year%2520for%2520each%2520turbine.

I'm not sure what stage Acciona is up to regarding photomontages, but please make the effort to make these as accurate as possible. I am sick of seeing photos taken on cloudy days so transmission lines or wind turbines blend in to the background. In one case the turbine blades have been made different colours in different photos so they don't stick out!

Being local I'm sure you'll have much more idea about this but please advertise in the local Dunedoo and Coolah Diaries and Gulgong Gossip as well as the larger 'local' papers like the Mudgee Guardian and Dubbo Liberal. A recent drop in session was only advertised in the larger papers and I only happened across it by accident the night before. The other option is the local Facebook pages.

The EnergyCo interactive map has proposed projects indicated in green and yellow shading. My understanding those who signed options for wind earlier on, that may have or are close to lapsing are still shaded on that map. It would be nice if that were kept up to date with the actual project boundaries. I understand that is EnergyCo, so I know what the "process" will be to get anything done but worth asking.

We spoke about the amount of kW projects are allowing per house according to their advertising

material. I have checked my table and the Orana Wind project has the lowest allocation, out of the 17 projects I have looked into in the CWO REZ, at 1.43kW per home. I would be interested in seeing where those figures have been plucked from?

And just for Adam's information, the project capital investment is stated as being up to \$1.2 billion! There could be a lot of solar put on rooves, and batteries in garages for that amount of money!! Saving agriculture paying the ultimate price!!

Many thanks,
Emma

On 2 Nov 2023, at 9:17 am, Johnson, Louise wrote:

Thank you for your email Emma, and thank you again for your time on Tuesday.

It was great to meet you in person and I really appreciated your insights.

Thanks also for the information below. I'll work through that with Adam (and others) and get back to you on a couple of the things you've mentioned.

I'm not sure if you're heading to the Council's Community Consultation Meeting on Tuesday evening but if you are, I will see you there.

Thanks again for being so willing to share what you know, it's really valuable and I appreciate it.

Louise Johnson
Community & Stakeholder Engagement Lead (NSW)

Melbourne, VIC, 3000
Australia

WWW.ACCIONA.COM.AU

From: Emma Bowman
Subject: Orana Wind
Date: 15 December 2023 at 9:08:09 PM AEDT
To: Louise Johnson

Hi Louise,

I hope this finds you well, and not too cooked!!

I don't have Adam's email address so I wondered if you could please pass this on to him, or whoever would be most appropriate?

The first time I met Adam (in the White Rose with you) I asked him about government subsidies for wind projects and he assured me there were none. I have now had more time to look into this and have found information around the Large Scale Generation Certificates, a scheme under the Renewable Energy Target run by the Australian Governments Clean Energy Regulator. I would be surprised if Adam

wasn't aware of this scheme (it will be very lucrative for companies like Acciona)! Like I have told him before, when he told my neighbour he'd spoken to me when he hadn't, I don't appreciate being deceived and it doesn't do anything for community support for any renewable project.

I have been in touch with [REDACTED] since I last saw your team in Dunedoo on Wednesday and she assures me she is not happy with the current turbine layout. She is also most disappointed that she was not consulted about the current layout before it went to the public. I am aware of other turbines in the layout that the landowners haven't yet fully approved. This is where a lot of my frustration comes from! "Consultation" should be transparent with affected landowners and the community!

I suggest Acciona goes back to the drawing board and consults adequately with the Dunedoo community before and during any possible planning. I can't tell you how much time I have spent on all of this and I, like many others, have reached the end of my tether. It's a shame that all proponents wouldn't have a bit more compassion for our communities and our livelihoods!

Kind regards,
Emma

-----Original Message-----

From: Emma Bowman

Sent: Friday, April 26, 2024 10:15 AM

To: Johnson, Louise

Subject: EXT: Orana wind

Hi Louise,

Hope you're well.

Just wondering if there are any updates on the Orana Wind project?

Thanks,
Emma

Sent from my iPhone

On 27 Apr 2024, at 4:59 pm, Johnson, Louise

wrote:

Hey Emma,

Thanks for reaching out.

I hope all is well with you and you've had a bit of a break over this (kinda) long weekend.

We do have a general update on the Orana Wind Farm which we popped on the Community Hub (webpage) last week.

I have copied the update below and it is also available here -
<https://community.acciona.com.au/orana/project-update-april-2024>.

Great to see you the other week. I'm sure we'll run into each other somewhere soon.

Project Update – April 2024

23 April 2024

ACCIONA Energía has decided not to participate in the first round of the Central West Orana Renewable Energy Zone (CWO REZ) access rights process as we have not yet been able to develop a feasible wind farm project at the proposed location for the Orana Wind Farm. We will continue to monitor the wind and endeavour to develop a viable wind farm in this proposed location. We hope to participate in future rounds of the CWO REZ access rights process when they commence.

Louise Johnson

Community & Stakeholder Engagement Lead (NSW)

Sydney, NSW, 2000

Australia

ACEN Australia

ACEN Australia are the proponents for the proposed Valley of the Winds project and Birriwa Solar project. They also own and operate New England Solar and the near complete and operational Stubbo Solar project.

I have had numerous interactions with ACEN Australia staff, from drop in sessions at the Coolah Office, a one on one meeting with Community Engagement and Communications Manager, Sarah Hafez, in Gulgong, Birriwa Solar IPCn site visit, to the site tour of New England Solar. There have been none more memorable than the Birriwa Solar IPCn public meeting at which the behaviour of the Community Engagement and Communication Manager was deplorable, highlighting the lack of sensitivity and empathy being shown to affected community members and landowners, especially during periods of high emotion. My complaint is detailed in correspondence below.

Following that same meeting my father, a very highly respected member of the community and fourth generation farmer, was accused of threatening ACEN Development Manager, Cedric Berge. My parents owned part of the land that will become the Birriwa Solar project in the 1990's, during which time we planted a number of tree blocks for livestock shade and shelter, and to ensure, as other trees aged, the property would not be left bare. Dad has had numerous conversations with ACEN employees regarding the potential removal of the tree blocks during project construction and believed he had come to a favourable arrangement, where the vegetation would be conserved, with the previous Project Manager. When the IPCn public meeting concluded, after some moments of high emotion during ACEN's final speech, Dad sought out Cedric and asked if the trees in question would be spared to which Cedric replied that they would be removed. After more than four hours of listening to landowners concerns, all of whom spoke in objection to the project, and DPHI and ACEN rattling off the benefits of such infrastructure, Dad lost his cool and attempted to inform Cedric of the importance of the trees to us, and to the environment. The result of this momentary lapse of composure was a report made to police of threatening behaviour, a visit from the local policeman the following afternoon, suspension of Dad's gun license and seizure of firearms. ACEN Australia, and all other renewable energy developers, have been threatening our way of life, businesses, homes, communities and environment for years without consequence, yet the moment a respected community member attempts to inform a staff member of the importance of, and willingness to protect, a certain asset police become involved and said

community member is dragged through the wringer. The loss of license and seizure of weapons has cost Dad a couple of thousand dollars in solicitors fees, hours of time, emotional distress and the ability to euthanise livestock and exterminate pest animals on our property – all extra burdens that were unnecessary.

I had a phone call in late 2024 from Development Manager, Cedric Berge, to inform me that there would be an amendment issued for the Birriwa Solar project. Cedric told me that ACEN had secured extra land for the project, something I had been questioning since my meeting in Gulgong with Sarah Hafez in January 2024, but that the capacity of the solar project would not change allowing for the infrastructure to be spread out. I asked him if that meant the trees we planted would be retained, to which he replied that the team would be happy to have a conversation with my family regarding that matter. I won't hold my breath!

Correspondence

12th June 2024

ACEN Australia,
Suite 2, Level 2, 15 Castray Esplanade
Battery Point, Hobart
Tasmania, Australia 7004

Dear Sir/Madam,

I am writing to you today to make a complaint to ACEN Australia of improper conduct of an employee. Ms Sarah Hafez represented ACEN Australia at the Birriwa Solar Independent Planning Commission public meeting in Dunedoo on Wednesday 5th June 2024. It is my belief that Ms Hafez's behaviour was unprofessional and inappropriate given the situation and company she found herself in. The public meeting was attended by most direct neighbours of the Birriwa Solar project, who have all previously expressed their concerns, and many community members concerned about the potential impacts such a development could have on their homes, communities, businesses and families. Ms Hafez was seen giggling with Mr Cedric Berge whilst one speaker was explaining about sheep getting caught in mechanisms at an already operating solar installation, ultimately leading to their death, and seemed to take great pleasure in spruiking about how much money ACEN Australia has contributed to the affected community to date, only intensifying suspicions from the community that developers are attempting to buy support. Her unprofessional manner was taken by the community members present as a complete disrespect and disregard for the concerns they had raised over the previous few hours.

I believe the role of "Community Engagement and Communications Manager" is very important and should be taken very seriously by ACEN Australia. Conduct by such an employee that alienates community members will not be beneficial for a company attempting to execute several projects within the Dunedoo district and Central West Orana REZ. Social license has not yet been achieved by any renewable energy company in this area; would ACEN Australia not prefer to put its best foot forward with regard to community relations?

This could present an opportunity for ACEN Australia to investigate the efficacy of its community relations team considering that there has not yet been one public acknowledgement of support for the Birriwa Solar project (130 objections to EIS and amendment exhibitions and no speakers in favour of the project at the IPCn public meeting).

It is extremely important that any employee who comes into contact with landowners and community members who feel their homes, livelihoods, families, businesses and communities will be detrimentally impacted by renewable energy developments, is sure to treat them with the utmost respect, compassion, empathy and kindness. Members of the community engagement team should be seen to show concern and consideration for those they interact with, not be found lacking integrity. I believe it is important that ACEN Australia reviews the IPC meeting recording, to better understand the concerns I have raised, and takes appropriate action to avoid this situation in the future.

Yours sincerely,
Emma Bowman

On 17 Jun 2024, at 2:21 PM, David Pollington

wrote:

Dear Emma,

Thank you for your email, with your complaint about ACEN staff behaviour at the IPC hearing in Dunedoo on 5th June 2024 for the Birriwa Solar Project.

Our representatives are all required to act professionally and show respect to members of the community regardless of differing view points. We look to work closely with the community to find ways to create long-term value, benefit, and minimise any negative impact. Please know that we hold our team accountable for ensuring interactions with the community are respectful and in keeping with our core values. Having reviewed the footage and discussed the events of the IPC meeting with the team, I believe the team conducted themselves in a professional manner.

With regards to your feedback on our community engagement team and their approach I agree that this is a very important role for our business that requires people with special skills and attributes. I am very proud of our team and the way they are doing their work. Whilst I note your dissatisfaction with the team, I note that we have received lots of extremely good feedback from a wide range of members of the community in the central west of NSW.

Finally we understand that not all members of the community believe in the Birriwa Solar Project and the benefits that we believe it will bring. We support their right to disagree with the project respectfully and safely. However it is of significant concern to us that two of our team members were physically and verbally threatened at the IPC meeting. We take the safety and well-being of our team seriously and are working with witnesses to understand these events and will follow up appropriately.

Should you wish to discuss your concerns further, please contact me directly.

Sincerely,

David Pollington
Managing Director

<image001.jpg>
ACEN Australia

From: Emma Bowman
Subject: Re: Complaint
Date: 18 June 2024 at 12:37:44 PM AEST

To: David Pollington

Dear David,

Firstly, in regard to the IPC meeting, whilst it was important for you to review the recording of the day, the footage solely focussed on the speakers, so the behaviour of Ms Hafez and Mr Berge during proceedings, when not speaking, was not recorded. As I previously stated, their giggling during information being presented by a community member regarding the death of sheep within a solar installation was inappropriate, unprofessional and disrespectful. I am genuinely curious what they found amusing?

I wonder if you could please give me more information about the “extremely good feedback from a wide range of members of the community in the central west of NSW”? Has this feedback originated from individuals, businesses and/or organisations currently, or expecting to, benefit financially from ACEN Australia renewable energy projects? I find it perplexing that if there is such support for ACEN Australia in the Central West why there are no submissions in support of the Birriwa Solar project nor any community speakers willing to publicly endorse the aforementioned project?

I would like to draw your attention to the Australian Energy Infrastructure Commissioners recent Community Engagement Review and Property Rights Australia and NREN’s Community Impact Survey (both attached). Each of these had over 750 respondents from across Australia detailing community sentiment with regard to renewable energy developers. The Community Engagement Review found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from developers was not relevant to the concerns that they raised. The Community Impact Survey, conducted between 12th April and 10th May 2024 found that 76% of those surveyed reported feeling pressured by energy companies to allow access to their private properties and a mere 3% believe that the developers have acted with integrity. Issues between communities affected by developments and proponents are not uncommon and ACEN Australia is certainly not immune.

David, I want you to think about your home. Is it not only a place where you reside, but your business and your life; somewhere you can’t fathom ever leaving? A place that has been owned by generations of your family for nearly 150 years in a district where your ancestors have worked hard to produce food and fibre for Australians for over 200 years? Is your home within a community that is renowned for rallying around people when times are tough; generous people who would give you their last dollar or the shirt off their back? Has the place you call home ever been through a natural disaster where you've spent days shooting and burying sheep, treating injured livestock and transporting animals to safe places, and months repairing and replacing farm infrastructure for friends and acquaintances, voluntarily, because that is what you were brought up to do? Is the home you hold so dear about to be turned from the quiet, scenic, rural landscape you have admired your whole life to an industrial area; a change that has the potential to drastically impact agricultural output, transport and traffic, water sources, the environment, visual amenity, increase fire risk and restrict fire fighting options, and that has already torn your once cohesive community apart?

ACEN Australia, through its proposed renewable energy projects within the Central West Orana REZ has been inadvertently threatening my home, family, business, community, landscape and environment for some years now, and inadequately responding to community concerns has continued to escalate already heightened emotions of distressed neighbours, friends and community members.

Is it time for the Managing Director of ACEN Australia to put his boots on the ground in the Central West Orana Renewable Energy Zone and hear first hand the concerns of those directly impacted by renewable energy developments?

Regards,
Emma

From: Emma Bowman
Date: Friday, June 28, 2024 at 09:23
To: David Pollington
Subject: Fwd: Complaint

Hi David,

The questions in my last email, below, were not intended to be rhetorical; I am awaiting your reply.

Regards,
Emma

On 1 Aug 2024, at 12:11 PM, David Pollington <

> wrote:

Hello Emma

As per my voice message to your mobile I am reaching out to have a conversation re your email feedback below.

I would be grateful if you could let me know a suitable time for us to have a conversation.

Regards

David Pollington
Managing Director

<image001.jpg>
ACEN Australia

M:
E:
Hobart: Suite 2, Level 2, 15 Castray Esplanade, Battery Point, TAS 7004
www.acenrenewables.com.au

From: Emma Bowman
Date: Thursday, August 1, 2024 at 19:29
To: David Pollington
Subject: Re: Complaint

Dear David,

I apologise for missing your call today. I note in your voice message you made an apology for taking a couple of weeks to respond to my previous email; it has indeed been over six weeks since I sent you my reply following your email the day prior.

I believe it is in both our best interests for you to provide a reply in writing. I am passionate about protecting my home and community and feel it is better for you to receive my edited feedback and reactions at this time.

Regards,
Emma

On 8 Aug 2024, at 3:50 PM, David Pollington

wrote:

Hello Emma

Thank you for your email – apologies about the delay in getting back to you, I had wanted to make the time to speak with you with my full attention – and have been travelling a fair bit including in regional NSW visiting our project teams and local communities.

In fact, you may be interested to hear that on my trip to Uralla, I was able to see for myself how well our host landowners' sheep and lambs (over 6000!) were thriving alongside our large-scale solar infrastructure – ACEN put a lot of care into working with these landowners when this project was just starting, and since the project began operations, they now are able to continue grazing in addition to benefitting as host landowners, building another income source, which as you know helps build resilience during the tough times in the bush that you mentioned in your note. I was also proud to formally sign contracts with the local First Nations groups there who are meaningfully employed on our project. Similar initiatives are being considered across our projects in the Central West – and we're co-designing benefit sharing programs with our community, focused on improved outcomes in education, environment, indigenous participation and community cohesion – so that we do our bit to contribute to a fair transition.

In fact, a suicide prevention program we recently supported in Gulgong, via the National Association for Loss and Grief, is only one of many examples where we are contributing to growing resilience and community cohesion. Gulgong has unfortunately experienced a high rate of suicide, and when the community asked ACEN to help, we stepped up. Participants have spoken openly about their gratitude for learning suicide prevention skills and support.

I cannot speak to the nature of public submissions to the Government-run planning process for our projects or about community feedback provided through other groups' research. What I can confirm for you though, is the evidence of the support ACEN has in our communities. Our social investment program is generous and discretionary – it is part of our company's philosophy to share benefits with the communities in which we operate. Our team based in Gulgong are constantly in touch with the Central West community, understanding community need and supporting initiatives designed by the community – not us.

As a local, I'm sure you're aware of our contributions to the Dunedoo Men's Shed and the Art Unlimited art show in Dunedoo. The Dunedoo Area Community Group recently asked us to financially support the installation of an EV charger at the Dunedoo Bowling Club, which we've agreed to as it lines up neatly with our commitment to improve environmental resilience and stewardship in the community. Employment opportunities in the renewable energy sector are significant – but for it to eventuate, our country kids need support to stay in school and participate in trades and STEM courses, so they can continue to work in their hometowns and benefit from the energy transition if they choose to. To support this outcome, ACEN Australia has contributed to scholarships for 10 students through the

Country Education Foundation – I encourage you to promote these scholarships within your network to ensure eligible young people avail of this opportunity.

In addition to financial support, the ACEN Australia team, along with our EPC Contractor, PCL Construction, also volunteer with the Gulgong Meals on Wheels, delivering fresh home style meals to enable residents to continue to live independently in their own homes. Since September 2023, we have delivered over 500 meals.

Emma, I acknowledge your views about renewable energy and the industry generally. I wanted to assure you that at ACEN, we receive and value feedback from a range of stakeholders on each of our projects, and we respond in a balanced way. Where possible, we make alterations to our project design to incorporate stakeholder and community views. Ultimately, as you know, the decision to approve any of our projects is made by an independent planning authority, and we abide by all legislation and regulation and regularly go over and above just complying.

Our project teams are deeply committed to respectful relationships with all stakeholders in keeping with our core values and they have a deep appreciation of life in regional Australia, with many of them having worked and lived in the bush for many years. As I noted in my original response to you, our employees and representatives are required to act professionally and show respect to members of the community regardless of differing viewpoints. I assure you once again, I have looked into your feedback, and reiterate my view that their conduct at the recent IPC meeting was in line with our company's expectations, and I commend my team for their resilience when faced with some difficult experiences on the day. I'm also aware that they have been courteous to you on your many interactions through the EIS, RTS and IPC consultation processes, and proactive and responsive to your requests for information.

I offer you again my promise that ACEN will continue to engage with the Central West community in a transparent and respectful manner. I am deeply grateful for the support of many community members and groups and our team is looking forward to continuing to share in and support the ongoing growth and resilience of the Central West region.

Emma, thank you for your participation in the engagement process to date. Should you require further information about the project, please reach out to our project team on . I should also note, that from the inception of our business, I have been closely involved with our project communities, and continue to make time for it. When I'm next in the Central West, you're welcome to meet with me.

Kind regards

David Pollington

David Pollington
Managing Director

<image001.jpg>

ACEN Australia

M:

E:

www.acenrenewables.com.au

From: Emma Bowman
Subject: Re: Complaint
Date: 12 August 2024 at 10:57:04 AM AEST
To: David Pollington

David,

We could go back and forth for an age regarding most of the points I have raised in my previous correspondence but I do not believe you will ever fully comprehend the negative impacts of large scale renewable energy infrastructure projects due to the fact that you will not be forced to live within the vicinity of one, and have the burden of the unfavourable impacts felt on your home, life, business, family and community.

I would be interested to tour the Uralla facility and witness for myself the sheep “thriving alongside the large-scale solar infrastructure”. Having been involved in raising sheep my whole life I have some doubts as to the long term viability of such a pairing, but I am willing to be proven wrong. There have been other instances where claims regarding solar grazing have been extremely misleading.

We will have to agree to disagree on the conduct of your employees at the IPCn meeting in Dunedoo. I wonder how you can be so sure when you yourself were not in attendance, and I wonder how many other community members you discussed the matter with?

One more thing I would like to bring to your attention is the extra property I am aware that has signed up to be part of the Birriwa Solar project, yet there has not, to my knowledge, been an amendment to include the property in the project. I have previously raised this with your employees and note the Community Engagement staff knew nothing of it and did not provide me with any information following my request. I wonder if you would mind looking into this and providing a response at your earliest convenience?

Regards,
Emma

Ark Energy

Ark Energy are the proponent of Burrendong Wind, among others in NSW. On the 8th of December 2023 I attended an information session held at Parklands Resort in Mudgee regarding the projects EIS which was on exhibition at that time. The majority of the crowd were project hosts but what I was most interested in was the floundering attempts at answering even, what I thought were, the most basic questions – not one employee could tell me off the top of their head what the peak workforce would be or how many OSOM loads would be required to transport each turbine. Andrew Wilson, General Manager Development, made a short presentation at the beginning of the session outlining how all the potential impacts were minimal and of no concern to the surrounding community! He also stated that Burrendong Wind should be a relatively easy project to get past the Department of Planning in terms of visual amenity. I was astounded that during questioning it was revealed that Ark Energy did not know where their proposed workforce would be housed and bushfire risk and fire fighting limitations were barely a consideration. It was worrying that the host landowners were content to listen to the information without question.

Note that Ark Energy has stated that the Response to Submissions and Amendment Report are due to be available on the Major Projects Portal project page by the end of 2024; they are yet to become available. (See December 2024 newsletter below.)

Burrendong Wind Farm



Photomontage of what the wind farm would look like from Kallawough Rd, Hargraves, approximately 2 km away.

December 2024
Newsletter

Response to submissions

The development application and environmental impact statement (EIS) for the Burrendong Wind Farm was submitted in November 2023 and placed on public exhibition from 16 November until 20 December 2023.

Thank you to everyone who attended the EIS information session in Mudgee at the end of last year and who took the time to read the EIS documents and make a submission. Several issues were raised in submissions including visual impact, biodiversity, and impacts on Aboriginal and cultural heritage. Ark Energy has now completed and uploaded its Submissions Report and updated technical assessments including for landscape and visual impact, noise and a revised biodiversity assessment report.



An information session to review the EIS was held in Mudgee on 8 December 2023.

Amendment Report

Ark Energy has also submitted an Amendment Report outlining key updates made to the proposal to reduce potential impacts. These include:

- Removal of the northern 330 kV powerline option.
- Realignment of the southern 330 kV powerline route to avoid proposed Phoenix Pumped-Hydro infrastructure.
- Minor realignment of sections of proposed access tracks to reduce impacts on Box Gum Woodland.
- Addition of an alternate site access route through Cudgegong River Holiday Park, next to Lake Burrendong.

The Submissions Report and Amendment Report are due to be available from the Burrendong Wind Farm page in the NSW Major Projects Portal by the end of 2024.



Visit: planningportal.nsw.gov.au/major-projects/projects/burrendong-wind-farm or scan QR code right.

Location



The project area for the proposed Burrendong Wind Farm is east of Lake Burrendong within Dubbo Regional Council and Mid-Western Regional Council areas, in the central west region of New South Wales. The site has an excellent wind resource and is within the Central West-Orana Renewable Energy Zone, an area identified as optimal for new renewable energy projects due to the natural resources and proximity to existing or planned network infrastructure.

New renewable energy projects are required to help the NSW Government meet its targets to halve emissions by 2030 and achieve net zero by 2050.

The proposal involves up to 70 wind turbines with a generation capacity of 400-500 megawatts.

Planning & assessment

Utility-scale wind farms in NSW are considered State Significant Development and assessed by the NSW Department of Planning, Housing and Infrastructure.

- 1 Site selection and preliminary investigations ✓
- 2 Initial concept and consultation ✓
- 3 Referral (updated) to the Australian Department of Climate Change, Energy, the Environment and Water (DCCEEW) for review under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). ✓
- 4 Scoping Report (updated) submitted to the NSW Department of Planning and Environment (DPE). ✓
- 5 Determination on EPBC Act referral by DCCEEW - controlled action with assessment under bilateral agreement (Ref 2022/09268). ✓
- 6 Secretary's Environmental Assessment Requirements (SEARs) for the Environmental Impact Statement (EIS) issued by DPE. ✓
- 7 Studies, assessments, design ✓
- 8 Finalising EIS for lodgment ✓
- 9 Development application (DA) and EIS lodged with DPE. ✓
- 10 DA and EIS on public exhibition and open for submissions. ✓
- 11 Response to submissions and further information lodged with Department of Planning, Housing and Infrastructure (DPIH, formerly DPE). ✓
- 12 Assessment and recommendation by DPIH, referral to Independent Planning Commission (IPC). WE ARE HERE
- 13 Determination by IPC
- 14 Determination by DCCEEW

Burrendong Wind Farm site map – 70 wind turbines



The proposal involves a layout of 70 wind turbines with a generation capacity of 400-500MW.

Next steps

After receiving more than 50 unique submissions during public exhibition, the DPIH will complete its assessment and recommendation, and refer the application to the NSW Independent Planning Commission (IPC) for determination. Final approval under the Commonwealth Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) will also be required from the Australian Department of Climate Change, Energy the Environment and Water (DCCEEW).

Thank you

Thank you to all those who have engaged with us on this project to date. Comments and suggestions are welcome at any time and can be sent directly to the project team via the details below. We wish everyone a safe and enjoyable festive season and look forward to updating you again in 2025.

More information

Tel - 1800 731 296

Email - info@burrendongwindfarm.com.au

Register for newsletters - arkenergy.com.au/mailling-list-details

Website - burrendongwindfarm.com.au or scan QR code right.





ARK ENERGY

arkenergy.com.au



ARK ENERGY

BRISBANE
Level 25, 239 George St
Brisbane, QLD 4000

SYDNEY
Level 2, 275 George St
Sydney, NSW 2000

TOWNSVILLE
Shop 6, 7-13 Tomkins St
South Townsville, QLD 4810

Eco Energy World

Eco Energy World are the applicant of the Avonside Solar project. There was no project information, nor community consultation, prior to the project showing up on the Major Projects Planning Portal – I just happened to stumble upon its existence. There has, to my knowledge, been no contact with the general community from Eco Energy World to provide information regarding the project, and my email below remains unanswered to date.

Correspondence

From: Emma Bowman

Subject: Avonside Solar Project

Date: 8 March 2024 at 3:09:42 PM AEDT

To:

To whom it may concern,

I am a landowner in the Dunedoo district. Could you please provide me with any information you have around when community consultation will begin for the Avonside Solar Project? Dates and locations if available please?

Is there a Project Manager/Director who is available to be contacted by community members regarding this project?

Regards,
Emma Bowman

Ib Vogt

The Dunedoo Solar Project, proposed by Ib Vogt, was one of the first to appear in the Dunedoo area. It came as quite a shock to local residents and landowners. Approval was granted by DPHI on the 2nd September 2021 yet no construction works have begun.

You'll note it took over twelve months just to receive a project update.

Correspondence

From: Emma Bowman

Subject: Dunedoo Solar Farm

Date: 10 September 2023 at 3:00:46 PM AEST

To:

Dear Simon,

I am a landholder in the Dunedoo district. Could you please provide an update on the Dunedoo Solar Farm?

Kind regards,
Emma Bowman

From:

Subject: Dunedoo Solar project

Date: 15 June 2024 at 2:03:55 PM AEST

To:

Hi Dan,

I was wondering if you could please provide an update on the Dunedoo Solar project?

Regards,
Emma Bowman

Sent from my iPhone

On 17 Jun 2024, at 5:55 PM, Dan Halperin
Hi Emma,

wrote:

Thanks for your email. We haven't met before. Do you mind providing a bit of background on your involvement with the Dunedoo SF project to date.

Anthony or I would be happy to give you a call to provide an update on the project.

Regards,
Dan Halperin
Director
ib vogt Australia

www.ibvogt.com

On 17 Jun 2024, at 7:00 PM, Emma Bowman

wrote:

Hi Dan,

I am a landowner in the Dunedoo district. My property is approximately 8kms east of Dunedoo.

I would prefer an update in writing please.

Regards,
Emma

-----Original Message-----

From: Emma Bowman

Sent: Monday, July 15, 2024 12:06 PM

To: Dan Halperin

Cc: Anthony Yarrow

Subject: Re: Dunedoo Solar project

Hi Dan,

I am yet to receive a reply to the below email.

I would like an update on the Dunedoo Solar project at your earliest convenience please.

Regards,
Emma Bowman

On 8 Aug 2024, at 3:06 PM, Anthony Yarrow

wrote:

Hi Emma,

Dan sent your enquiry to me to provide a project update.

Please refer to the website for information on the project.

<https://dunedoosolarfarm.com.au/>

The project is continuing to proceed in accordance with the development approval from the NSW Government.

<https://www.planningportal.nsw.gov.au/major-projects/projects/dunedoo-solar-farm>

Ib vogt has also received approval in May 2023 from the NSW Planning Secretary to stage the development and undertake early establishment landscape works, intersection and road upgrade works prior to construction of the solar farm. The proposed staged development approach for the Project includes:

- Stage 1 - Early establishment of landscaping, intersection and road upgrade works
- Stage 2 - Solar Farm construction works

The major change to the project since approval is the timing of construction. Due to delays with the grid modelling, the grid connection approval for the project has taken longer than expected and delayed the start of construction.

Regards,
Anthony

Anthony Yarrow
Commercial Manager (Australia)

www.ibvogt.com

From: Emma Bowman
Subject: Re: Dunedoo Solar project
Date: 11 August 2024 at 11:34:58 AM AEST
To: Anthony Yarrow
Cc: Dan Halperin

Hi Anthony,

I am across the information available on the Dunedoo Solar website and major projects portal.

What I was really after was an update regarding timing of construction and early works associated with the Dunedoo Solar project?

I note that there are no community updates available since October 2020.

Regards,
Emma

From: Emma Bowman
Sent: Tuesday, September 24, 2024 11:23 AM
To: Anthony Yarrow
Cc: Dan Halperin
Subject: Fwd: Dunedoo Solar project

Hi Anthony and Dan,

I would appreciate a response to my question below.

When does IbVogt plan to begin early works and solar project construction for the Dunedoo Solar development?

I understood the project was to connect to existing transmission lines so could you please explain why/how grid modelling and approval has delayed construction?

Regards,
Emma

On 24 Sep 2024, at 12:31 PM, Anthony Yarrow

wrote:

Hi Emma,

The project is connecting via a new 66kV line from the solar farm to the existing Essential Energy Dunedoo Substation. Any new generator, regardless of whether it connects to an existing line/substation or a new substation, is required to undertake grid modelling to ensure the new generation project can connect to the electricity system safely and comply with the standards set by the network operator (AEMO). This is a rigorous and often lengthy process.

Ib vogt has also been closing out other various pre-construction approvals and access rights to allow the project to proceed.

In terms of a construction timeline, there is still some uncertainty which is why it's difficult to put a date on it. We expect to start stage 1 works (landscaping and intersection upgrade) in the 1st half of next year with the solar farm construction to follow.

Regards,
Anthony

Anthony Yarrow
Commercial Manager (Australia)

www.ibvogt.com

From: Emma Bowman
Sent: Friday, 10 January 2025 5:02 PM
To: Terry Daly
Subject: Fwd: Dunedoo Solar project

Hi Terry,
Please see below forwarded email.
Regards,
Emma
Sent from my iPhone

Begin forwarded message:

From: Emma Bowman
Date: 10 January 2025 at 3:48:03 pm AEDT
To: Anthony Yarrow
Cc: Dan Halperin
Subject: Re: Dunedoo Solar project

Hi Dan and Anthony,

Can you please explain to me why the Dunedoo Solar Farm website is no longer accessible (<https://dunedoosolarfarm.com.au/>)?

Regards,
Emma

From: Terry Daly
Subject: RE: Dunedoo Solar project
Date: 13 January 2025 at 10:05:57 AM AEDT
To: Emma Bowman

Hi Emma

At the end of 2024 our existing web services provider advised they would no longer host the Dunedoo website. We transferred the hosting service to Siteground. However that transfer seems to be experiencing a technical issue.

I will follow up with Siteground to try and have the issue rectified.

Regards
Terry

From: Dan Halperin
Subject: RE: Dunedoo Solar project
Date: 16 January 2025 at 1:01:01 PM AEDT
To: Emma Bowman, Anthony Yarrow

Hi Emma,

Anthony is out for a few weeks and I only just got back from a break.

We are looking into it and will provide you an update as we get to the bottom of it.

Regards,
Dan

Lightsource BP

Lightsource BP is proposing the Sandy Creek Solar project between Cobbora and Elong Elong. They were also responsible for the design, construction and original operation of Wellington and Wellington North Solar projects. It is abundantly clear, given the information provided in the Sandy Creek Solar project EIS that the Lightsource BP team, and/or consultants engaged to complete the reports, have no knowledge of the local area – stated that Dunedoo Solar is under construction which it is not, did not bother to use Google maps to estimate distances between the project and local towns and cities.

At a drop in session held in Dunedoo on the 26th October 2023, LightsourceBP Head of Planning, Diana Mitchell, informed me during a discussion about the impacts of large scale solar installations on valuable agricultural that she did not believe the two Wellington Solar projects would be approved under the current regulations/guidelines given the amount of BSAL contained within the sites.

NB: The below email has not yet been responded to.

Correspondence

From: Emma Bowman

Subject: Solar grazing study

Date: 19 August 2024 at 6:52:14 PM AEST

To:

Hi,

Have the study results on the performance and profitability of the grazing operation at Lightsource BP's Wellington Solar project been publicly released? If so, could you please send them to me, or advise when I can find them?

Regards,

Emma Bowman

From: Emma Bowman

Subject: Fwd: Solar grazing study

Date: 5 October 2024 at 3:46:53 PM AEST

To:

Please see below unanswered email from 19th August 2024.

Could you please provide the requested information ASAP?

Regards,

Emma

Marble Energy

Marble Energy are proposing the Cobbora Solar project which is currently at the stage of preparing the Environmental Impact Statement. On the 23rd October 2024 I attended a drop in session at the Jubilee Hall, Dunedoo. I spent nearly two hours with representatives from Marble Energy discussing the potential impacts of such a project and the cumulative impact of having three large scale solar developments and a wind installation in very close proximity to one another. There was an employee who took notes of the interaction I had with another staff member and my email address and phone number were taken so as to provide a response to my issues – it is now over three months later and I have not heard anything from Marble Energy. The staff member I spoke to also suggested we gather a small group of concerned landowners and community members, maybe ten, to meet with Marble Energy and discuss our concerns at length. She was going to get back to me because she was hoping it could be done the next time she was in the area – alas, I have not heard from her either.

RES (Renewable Energy Systems)

RES is responsible for the Tallawang Solar project located near Gulgong, and until its withdrawal Barney's Reef Wind between Birriwa and Gulgong. On the 16th November 2023 I attended a drop in session regarding Tallawang Solar, not unlike my dealings with other renewable energy developers there were not a lot of answers, notes taken but no response.

Does ticking the community consultation box count if developers say they are going to do the right things but never actually follow through?

Tilt Renewables

Tilt Renewables is the proponent of the Liverpool Range Wind project, which recently had its modification approved, located between Coolah and Cassilis. I attended a drop in session at the Coolah office on 26th October 2023 (the same day I was also present at a drop in session in Dunedoo for

Lightsource BP's Sandy Creek Solar) where we discussed the Sir Ivan Bushfire and the loss of communications which saw members of the affected communities receive the emergency evacuation text message days after the event occurred, and the need for Tilt to provide its own fire fighting resources and volunteers that can be utilised for all fires in the region.

When I asked about the status of host landowner agreements the response was that the landowner agreements were current and there were no issues, which I later found out was not entirely accurate. Although no details can be shared due to non-disclosure agreements I was informed that option agreements with Tilt were close to, if not, expired and Tilt was scrambling to get landowners to sign again to keep the project afloat.

Given the lack of meaningful, effective and transparent community consultation and engagement there have been innumerable community members, all over the New South Wales, and indeed Australia, attempting to educate and support both their local communities and the wider population about the “rapid transition to renewable energy” and Renewable Energy Zones. I have been to countless community led meetings, spoken at some, and assisted in hosting four where I presented the following: (NB: This was the most recent iteration of the slide show (attached separately) and speech; updates were made as new information came to light.)

BALLIMORE COMMUNITY MEETING PRESENTATION 21.3.24

Good evening and thank you for coming. A big thank you to everyone who has helped us make this evening happen. For those of you who don't know me, my family property is just East of Dunedoo. We run Shorthorn and Poll Hereford cattle, Merino sheep and do some cropping on our 2,500 acres. Our property is split by the Gwabegar railway line and the double Golden/Castlereagh Highway so I have years of experience dealing with government authorities – to be honest those two pieces of infrastructure are the bane of my existence, and cause management issues nearly daily. Approximately 6 years ago my family was approached by the then RMS, now Transport for NSW, regarding the Golden Highway upgrade. We were treated very poorly, constantly threatened with compulsory acquisition and had to fight hard to keep from being absolutely steamrolled. It was one of the most stressful periods of my life; one I wouldn't wish upon anyone. Hence the urge I initially felt to assist and support those affected by the CWO REZ transmission project, and why I ended up down the CWO REZ rabbit hole you will find me in now.

This meeting is not about telling you what is right or wrong. It is an opportunity for you to learn more about the Central West Orana Renewable Energy Zone, proposed wind and solar projects and the current transmission project. I am certainly not an expert on the subject but if you have any questions as I go through this presentation, please let me know and we'll try our best to answer. I will try to keep it as brief as possible.

Who is EnergyCo?, taken from the EnergyCo website

- *The Energy Corporation of NSW (EnergyCo) is a statutory authority which was established under the Energy and Utilities Administration Act 1987*
- *The Electricity Infrastructure Investment Act 2020 identified that EnergyCo would be appointed as the Infrastructure Planner for the state's first five REZ's. "As the Infrastructure Planner for these REZs, EnergyCo will recommend network infrastructure projects and will work closely with communities, investors and industry to coordinate investment in renewable energy generation, electricity networks and storage infrastructure in REZs for the long-term benefit of energy consumers, local communities and industry in NSW."*
- *EnergyCo operates under the direction of the NSW Minister for Energy*

Facts about the CWO REZ, taken from the EnergyCo website

- *The Central West Orana REZ is NSW and Australia's first renewable energy zone. Does that make us the guinea pigs?*
- *It covers 20,000 square km, which is equal to 2 million hectares of which the primary land use is agriculture.*
- *The CWO REZ will initially unlock 4.5GW of new network capacity by the mid 2020's.*
- *You need to be aware the CWO REZ was originally declared with an intended network capacity of 3GW, but a declaration amendment was signed by Minister for Energy, Penny Sharpe, to increase the network capacity to 6GW in December 2023. There is also a proposed increase to 9GW by 2043.*
- *At this point there is no maximum capacity stated.*
- *EnergyCo states that at its peak the CWO REZ will support around 5,000 construction jobs in the region.*

- *“The Minister may amend the declaration to expand the specified geographical area of the REZ, increase the intended network capacity, specify additional generation, storage and network infrastructure, provide further details and specifications or correct a minor error.”*

Map

- Point out towns

Proposed Wind Projects

- These are the 12 wind projects within the CWO REZ that I am aware of. Bodangora is operating, the rest are at different stages of development. I have been made aware that Spicer’s Creek Wind, being Squadron Energy, is looking at expanding and creating Spicer’s Creek 2 so that may mean double their current proposed project.
- 11 of the 12 projects include a total of 922 wind turbines on over 150,000ha of land according to my calculations, made using information from scoping reports and EIS’s.
- Orana Wind, proposed for south of Dunedoo, has more than halved their project since it was first released.

Proposed Solar Projects

- There are 28 solar projects operating, under construction and proposed in the CWO REZ that I can find. For twelve of those projects there will be 8.5 million solar panels installed.
- Over 17,000ha of solar means that area is no longer able to be used as efficiently for agriculture! Think of the flow on effects of taking that amount of land out of food and fibre production.

Proposed Battery Energy Storage Systems

- There are currently no BESS’s operating in the CWO REZ to my knowledge. The 10 projects listed here are BESS only. Some are additions to approved and operating projects and some are standalone battery systems. According to the information I have sourced there is currently over 20,000MWh of storage proposed in the CWO REZ.
- There is also Pheonix pumped hydro proposed for near Lake Burrendong. It has a capacity of 810MW and 12 hours of battery storage.

Cumulative Impacts of the projects within the CWO REZ

- *There are 48 projects - operating, under construction & in various stages of development, plus the current CWO REZ transmission project.*
- *The possible peak workforce, according to scoping reports & EIS’s of 30 projects, is over 12,500. I hope you’ve noticed the major conflict with EnergyCo’s estimation of 5,000 workers. All of the projects are unlikely to reach peak workforce at the same time but there is definitely the potential for a lot more workers than EnergyCo has estimated.*
- *Road use – over 7,000 extra vehicles on local roads daily, for the 11 projects that I could find traffic volume information on.*
- *Water use – over 3,440 megalitres per year, for the same 11 projects as above, which is over 9.7ML per day. That is equal to nearly 4 Olympic sized swimming pools a day!*
- *Environmental impact – there will be many trees removed, and not just regrowth but valuable established habitat for wildlife.*
- *There’s also bushfire risk & major restrictions on fire fighting,*
- *Noise – both construction and operating,*
- *Human & animal health,*
- *Biosecurity risks,*
- *Loss of agricultural land which leads to less money being spent in local businesses and*
- *Families possibly leaving the district which will have impacts on volunteer organisations and schools.*

Here are some Interesting Numbers

- *According to the 2021 census there are 3.2 million homes in NSW.*
- *The number of homes estimated to be powered by 30 of the projects in the CWO REZ, according to proponents advertising material, is over 5.5 million!! How is it an area this small is being*

tasked to power more homes than are in our whole state? And why then, does there need to be so many wind and solar factories built in NSW?

- *Dunedoo Solar - one of the smaller industrial sized projects within the CWO REZ, will generate 55mW of power from 79ha of solar panels and has a capital investment of \$76 million.*
- *Liverpool Range Wind, in the Coolah/Cassilis area – the largest project within the CWO REZ will generate 962mW of power from 185 turbines – has a capital investment of \$1.272 billion.*
- *Total capital investment for 35 of the 48 projects in this REZ is \$18.5 billion dollars. Where do you think this money is going to be recouped? Tax payer dollars or power prices.*

Community Benefit Funds

- *Local councils have policies around planning agreements being put in place with renewable energy proponents. These policies generally state that 1.5% of the capital investment value of the project as a total value over the life of the project must be paid to council. New guidelines suggest this should change to an encouraged payment per megawatt - \$850/MW for solar & \$1050/MW for wind.*
- *Agreements can be put in place to ensure funds are spent in the immediate vicinity of a project.*
- *This is a quote from Minister Sharpe's press release following the announcement of \$128 million to deliver community projects and employment opportunities in the CWO REZ. It states "the Community and Employment benefit fund will be administered by NSW EnergyCo. Upfront funding will come from the Transmission Acceleration Fund, and after 2028 will be funded through access fees paid by renewable energy generators connecting to new transmission lines in the Central-West Orana REZ." Minister Sharpe then said "the NSW Government will work with local communities and councils to ensure they have a say about how funding is allocated, so projects reflect community priorities." This region has not had a great track record with Government funded projects in the past. Examples being Cobbora Coal and the Three Rivers Retirement Project in Dunedoo.*

CWO REZ Transmission Project (figures take directly from the EIS)

- *The Environmental Impact Statement (EIS) was on exhibition from the 28th of October 2023 to the 8th of November 2023. Originally it was only to be a period of 28 days but due to a number of complaints was extended to 6 weeks.*
- *The documents totaled 7910 pages.*
- *The majority of the data that made up the EIS was sourced from desktop studies, and is subject to "further refinement" and "detailed design".*
- *4,000ha of agricultural land will be taken out of use during construction.*
- *2,700ha for operation.*
- *A quote from the EIS, "the location of permanent infrastructure has also been guided by, amongst other things, landowner feedback, and the willingness of landowners to host project infrastructure on their property." I wonder if the affected landowners would agree?*
- *Being a public authority, EnergyCo has the authority to compulsorily acquire easements and land.*
- *Transmission lines consist of 330kV and 500kV, in some places there are twin 500kV and single 330kV in the same easement which requires a 240m corridor.*
- *The project is estimated to have an average annual construction expenditure of \$300 million for 4 years. That is a total of \$1.2 billion for the construction period. Interestingly, the Network Infrastructure Strategy, a document released by EnergyCo in May 2023 states the construction cost preliminary estimate is \$3.2 billion for the CWO REZ with 4.5GW capacity.*
- *The Response to Submissions was released on Monday 11th March 2024*

Map

- *Point out towns and Energy hubs*
- *The so called Merotherie Energy Hub is not on the property "Merotherie". It is located on "Round Camp". EnergyCo are in the process of acquiring the whole property, which will destroy a*

family home and their livelihood, not to mention the loss of generations of history. On November 22nd this family were given 6 months notice to vacate the property.

Agriculture

- *Only 7 land owners, out of 110 affected, were interviewed for assessment of potential impacts relating to agriculture.*
- *The EIS states that “the project also has the potential to place restrictions on the movement of landowners, workers, livestock, and equipment within and across the construction area, temporarily and permanently limiting cropping and aerial agricultural operations, removal of vegetation (as shade or shelter), and changes to farm infrastructure such as fencing and dams.”*
- *Estimated loss of agricultural production of around \$1.35 million per annum during construction.*
- *Biosecurity risk – regular vehicle movements between multiple properties dramatically increases the risk of spreading noxious weeds and animal diseases.*
- *Landowners consulted didn’t view footrot or OJD as a problem in the area. There were huge increases in the number of cases of footrot from 2020 to 2021 that were attributed to the wet season, so my question is, is it still hanging around? And OJD was said to be “well managed” in the project area, I beg to differ because if it is on my property, where else might it be?!?*
- *Flow on effects to local small businesses like farming contractors and freight, rural merchandise stores and voluntary community organisations, just to name a few.*

Water & Waste

- *The project is predicted to use 700ML of water per year – 250ML non-potable for dust suppression, earthworks & landscaping, 400ML potable, that’s drinking water, for accommodation camps and concrete batching facilities. 700ML per year is equal to 1.91ML per day. According to a Warrumbungle Shire councillor, last summer Coolah’s water use was around 0.62ML per day.*
- *Water is to be sourced from the Talbragar River, groundwater bores and council owned potable water sources in Dunedoo, Coolah & Gulgong. What impact will the project water use have on the district water table and therefore the town water supply’s?*
- *Waste water treatment plants will possibly be built at construction compounds and accommodation camps otherwise it will be transported to licensed treatment facilities.*
- *265,000m³ of green waste, 1,000t excavation spoil, 12,500t concrete waste, 2,100t steel/metal, 200t cabling waste, 85t hazardous waste, 105t road base/gravel waste, 33t empty oil & other containers, 130t of oils, 1,200t packaging waste, 2,500t camp & compound waste, 300ML liquid waste (including sewage). Where will this waste end up? There is no capacity at nearby council facilities. How many extra heavy vehicle movements will it take to get rid of this waste?*

Roads & Transport

- *Most of the oversize, overmass (OSOM) vehicles will travel from the Port of Newcastle to the energy hubs.*
- *The main access road to Birriwa energy hub is Merotherie Road, over 1.7km of flood plain. For those of you who don’t know Merotherie Road the flood plain section goes under approximately 1 metre of water in an average flood. What will upgrading the road, with culverts and other engineering solutions do to the whole Talbragar River system?*
- *According to the EIS, “Merotherie Road was inaccessible during the time of survey due to a major flooding event, which resulted in no traffic volumes recorded on the road.” Did that raise red flags for EnergyCo about site suitability?*
- *Local roads like Birriwa Bus Route South & Gingers Lane are classified as “bi-directional two lane roads (one lane each direction)” and 100km/hr. Both of these roads are narrow dirt roads on which two vehicles cannot pass each other whilst still being on the road.*
- *The Golden Highway is rated as having the capacity for 1,800 vehicles per lane per hour which is 1 car every second. Merotherie & Spring Ridge Roads are rated as 1,000 vpl/hr roads, which is*

more than 1 car every 2 seconds. In my opinion these roads have been rated so high to make EnergyCo's impact look minimal.

- *There are meant to be 12 light and 20 heavy vehicles at access gates per hour.* An access gate is where EnergyCo accesses a property off a public road. I imagine currently most properties would not have more than a couple of vehicles a day entering.
- *It is stated that "the anticipated impact of construction traffic on road pavement conditions is considered to be minor."* I find this unbelievable as it is expected there will be an extra 100 vehicles per hour travelling on the Golden Highway between Merotherie Road and Spring Ridge Road, through Dunedoo, during construction!

Bushfire Risk

- *There is no mention of 1979 Birriwa fire in bushfire history.* That fire burnt a fair amount of the proposed project area.
- *Transmission lines can be a source of bushfire ignition.*
- *The EIS states "the risk of a bushfire from project construction activities has been assessed as extreme."*
- *A 20,000L static water supply tank and 38mm storz outlet will be provided at construction compounds & accommodation camps.* There is provision for a slip on unit to be made available for the project during the declared bushfire danger season, generally start of October to end of March. Does this mean EnergyCo is expecting the affected community's Fire & Rescue and RFS units to protect their project and workforce?
- There are apparently *"no identified difficulties in accessing and suppressing fires that could occur within the operation area" (aerial or land).* From a ground firefighting perspective what if there are transmission lines down or a solar factory nearby? And from an aerial perspective what happens when wind turbines are located near the transmission lines? What pilot is going risk flying near towers or turbines during a bushfire? There were many homes saved and impacts minimised through aerial support during the Sir Ivan Bushfire.

Noise & Environmental Impacts

- There are *predicted noise exceedances at many residences during the construction of transmission lines, towers, switching stations and energy hubs, some by 25db.*
- *High noise exceedances are predicted on local roads, especially at night, as existing traffic volumes are so low.*
- *"Corona noise" is transmission line noise. It sounds like a crackling noise or a hum and is often worse in fog, mist or rain.*
- It is anticipated there will be *direct impacts to 1,032ha of native vegetation.*
- There is the *potential to directly impact 33 species of threatened flora and fauna or their habitat, including the threatened Squirrel Glider.*
- *Biodiversity offsets would be required and will be finalized during "detailed design".* According to NSW Department of Planning and Environment, the Biodiversity Offsets Scheme is the framework for offsetting unavoidable impacts on biodiversity from development with biodiversity gains through landholder stewardship agreements. Will these offsets be managed like National Parks and become a harbour for noxious weeds and feral animals?

Workers Accommodation & Workforce

- It is expected there will be a *peak workforce of 1800* for the transmission project.
- There are proposed *workers camps at Neeley's Lane, Cassilis, for 600 workers and the energy hub near Birriwa for 1200 workers.* What about the people that live close to these camps? Will they feel safe?
- *Possible construction 7 days a week between 7am and 7pm plus some out of hours works, including concrete pours and stringing of transmission lines over main roads or the railway.*
- It is expected that it will be a *fly-in fly-out and drive-in drive-out work force.*

- *Approximately 10 per cent of the workforce is expected to be from the study area, the rest from NSW!* Is it realistic to think they will find 1800 people in NSW to fill the workforce? What will it mean for local businesses looking for employees?
- *First aid facilities will be provided by a paramedic or medical practitioner.* But what happens when workers need an ambulance or hospital?

The View

- 1. Looking at the Energy Hub near Birriwa.
- 2. The view from dwelling 399 where there are two 500kV lines 240metres from the house.
- 3. The view from dwelling 717 where there are twin 500kV lines and a single 330kV line as well as a switching station in front of the house.
- 4. This is the view south from Blue Springs Road. Please note how deceptive this photomontage is as the trees have not been removed. There is to be an 80m by 80m area around each transmission tower permanently cleared of vegetation.

Affected Farmers

- *The disrespect and disregard shown to affected land owners by EnergyCo includes the threat of compulsory acquisition at every meeting, being shown maps but not allowed to keep them, misrepresentation of community and landowner opinion and not being informed or being lied to about reasons for contractors entering their properties.* That is just a few of examples of what affected farmers are dealing with. The stress being put on those who have been forced to negotiate with EnergyCo is immense. The time taken to attend meetings, do research and read scoping reports and EIS's is all unpaid, and means either longer days to get what needs doing done, or things not happening on their properties. A mental health survey conducted by concerned community members at the end of February highlighted the anxiety and stress the CWO REZ has already caused affected individuals.
- *The EIS states that "where practicable" the alignment should be located at least 500m from existing dwellings. Dwelling 399 is 240m from the transmission lines, and despite the landowners' best efforts has not yet been moved.* EnergyCo have recently offered the landowner 100% of the value of their home compared to the original offer of 35%. However, there was a reason this family chose to build their home where they did – it is the most suitable site on their property.
- *Opening letters were issued to landholders along the proposed route in May 2023.* These letters allow for *minimum 6 month period* of negotiations.
- *EnergyCo sent a letter to affected landholders on 8th November, prior to the transmission project EIS exhibition period closing, stating their intent to begin the compulsory acquisition process within 21 days; the Proposed Acquisition Notice (PAN) was issued on December 8th – notice the timing, just prior to Christmas.* The PAN allowed for 90 days of negotiation before compulsory acquisition.
- *The PAN end date was originally March 15th, but, as of March 14th, has been extended until April 5th. On Thursday 7th March there were 17 out of 90 landowners that had not signed an agreement with EnergyCo.* It is my belief that there would not be the number of voluntary agreements signed without the threat of compulsory acquisition.
- *Farmers that host wind and solar projects have a choice; those under the proposed transmission lines have no choice!* Renewable energy projects obviously need transmission lines to get the power to where it is to be used, but is it fair to inflict that responsibility on land holders who would rather be farmers than power generators or conductors?

What's Next?

- Point out lines toward Tooraweenah from Birriwa and to Stubbo from Wollar
- There are proponents prospecting all around the CWO REZ; specifically the Tooraweenah and Mendooran areas.
- I have personally questioned the EnergyCo CEO regarding the routes for the proposed lines in red, but they insist there is no study corridor available.

- Based on previous experience it seems that developers gauge interest in certain areas, sign landholders up for options and then EnergyCo comes in and joins the dots with transmission lines. This suggests transmission lines will not be limited to the current proposals, as branches will be added to connect additional projects if or when they are approved.

Draft Energy Policy Framework

- *According to the Department of Planning and Environment “the framework includes guidelines that will provide communities, councils and the energy industry with clearer guidance on how the impacts of renewable energy projects and transmission infrastructure will be assessed and managed.”*
- *If passed the energy guidelines will allow the Minister to consider requests to declare wind and solar “energy development as Critical State Significant Infrastructure if it includes a significant energy storage system (for example, a delivery capacity of 750MW or more).”*
- *“The Minister is the determining authority for all CSSI decisions.” “Additionally, landowners’ consent is not required for CSSI applications and a decision made cannot be subject to judicial review... unless approved by the Minister.”* According to the Department of Environment this means a developer will be able to plan a project on your land without your consent, but I understand they will not be able to begin construction without landholder approval – I’d watch this space if there are not enough willing hosts!

Suitable areas for wind energy development map

- Please note this map was updated during the exhibition period, without noticed, changing the legend from desirable sites, suitable sites and less suitable sites to highly suitable, shown in red, and suitable sites, shown in green.
- The following note was also added – “unmapped areas are not necessarily unsuitable for wind energy development. The map is based on existing and planned transmission at the time of publication and is subject to change over time.”

Desirable locations for solar development map

- The legend says what is coloured red is desirable sites, yellow is suitable sites and green is less suitable sites. I’m sure you’ve noticed that nearly the whole CWO REZ, and others are red and yellow. And most of the desirable and suitable sites are over NSW and Australia’s food bowl.

Other implications

- *Warrumbungle Shire Council is not 100% clear on how land rating will change in regard to renewable energy projects but they assume all land under solar and the footprint of wind turbines will change from ‘farmland’ to ‘business’ rating.* It is unclear if that will have an impact on neighbouring land at this point.
- *WSC also stated that EnergyCo may not have to pay rates on the land they have acquired for Energy Hubs and accommodation facilities.*
- *Landholder public liability insurance implications for transmission infrastructure and solar and wind projects.* If damage caused to infrastructure is found to be caused by a landowners’ negligence how will our public liability insurance cover costs? Most policies allow for \$20 million worth of public liability but the majority of these projects are worth hundreds of millions of dollars.

How you can say NO!

- *If you are not interested in hosting wind or solar projects make it very clear from the start! I advise not letting developers or EnergyCo on your property.*
- *There are signs available for purchase to deter trespassing.*
- *Keep in contact with your neighbours and work as a group; do not let developers or EnergyCo ‘divide and conquer’.* There are many examples of developers and EnergyCo telling landowners others have signed up or are happy with certain situations when that is not the case.
- *Get everything in writing!*

Who can help you?

- Sal and I have been working together, for some time now, trying to get the best outcomes for communities within the CWO REZ, and the REZ's that will follow. We have contacted every Member of the NSW Parliament via email and met in person with Ministers and Shadow Ministers to try to raise awareness around what is happening on the ground and educate them on the potential impacts on rural and regional NSW.
- We have a lot more information than when we started, so please contact one of us if you're looking for something.
- I'd like to take this opportunity to thank Sal for all the time she has invested in our attempts to protect the communities affected by the CWO REZ, and more generally the "rapid transition to renewable energy". I could not have done half of the things I have done without Sal's assistance and encouragement. Thanks Sal.

Unresolved & Potentially Unmitigable Issues

Community Engagement

When will EnergyCo, and renewable energy developers, be forced to adequately consult affected communities, not just hold the required number of sessions? As discussed previously, and I'm sure in many other submissions to the Inquiry, consultation regarding large scale renewable energy infrastructure projects has been poor, at best, unless you are a potential host or neighbouring landowner whose agreement is vital to a project getting off the ground.

From CWO REZ CRG Meeting Minutes 27th April 2023:

- RH: We need to view an engagement and communications strategy for the REZ. Engagement activities are ad-hoc. RH commented there is no two-way exchange and would like to know the activities planned and their purpose. CA advised EnergyCo holds a range of engagement activities and meets with Council on a range of topics, it will be shared if approved. **ACTION:** Query if a copy of CWO REZ engagement and communications strategy can be shared.

Listed under actions of the same Meeting Minutes:

A copy of EnergyCo's overarching CSE strategy for the CWO REZ project is attached with the minutes. EnergyCo notes that this is an internal EnergyCo document and is not intended for external distribution beyond the CRG. Since this is an internal working document to guide EnergyCo's CSE outputs, it is not planned to be published on EnergyCo's website.

There are innumerable documents and meeting minutes publicly available where it is made plainly obvious that EnergyCo was made aware of the community consultation and engagement issues within the CWO REZ, and I suspect other REZ's, yet there have been little to no changes on the ground.

There are specific guidelines and framework when carrying out community consultation and engagement for large scale infrastructure projects, despite these regulations not being adhered to in practice and EnergyCo's threat to prohibit projects that do not have community support connecting to the REZ network (see below), these projects are being approved. Is there even a way to enforce a certain standard of consultation and engagement?

From EnergyCo's CWO REZ Project Update September 2022:

Working with the community

EnergyCo is proactively investigating how we can manage cumulative impacts during the construction and operation of the REZ, as well as provide lasting benefits to the local communities which will host renewable energy infrastructure.

Initiatives under development by EnergyCo across the REZs include:

- NSW transmission guidelines which would provide a robust framework for the planning and development of new transmission infrastructure and provide certainty for landowners, communities and project proponents
- Draft guidelines on orders prohibiting connection to the REZ network where community support hasn't been established
- A regional energy strategy outlining community energy schemes and other initiatives
- Guidelines to ensure First Nations people are engaged and benefit from the REZ
- Opportunities to bring forward the delivery of community benefit sharing initiatives in advance of access fees being collected from generators.

Our social licence approach

This Better Practice Guideline has been developed through the frame of social licence. By applying a social licence lens, we are able to see how individual impacts, actions and relationships add up and affect the building of trust and acceptance.

The concept of a social licence to operate emerged in the late 1990s, as affected communities and governments required the mining industry to increase its focus on social obligations and corporate social responsibility programs.¹ It is now considered a key condition for many other industries, including in the energy sector.

Our social licence definition

This Better Practice Guideline is underpinned by the below definition of social licence.

In all instances in this document, the term 'social licence' refers to social licence to operate, recognising that 'licence' is a dynamic concept. It is neither a buyable commodity, nor something that exists in perpetuity.

Social licence to operate is a concept that **reflects community acceptance or approval around the operations of an organisation and its developments**. Community acceptance comes from prioritising trust, delivering overall positive impact and is granted and denied by the community in line with their social, political and economic conditions.

Establishing social licence to operate is not simple due to it being based on the **diverse values, interests and concerns** that contribute to community expectations and as such requires the consideration of **relational aspects** between the industry and communities, industry affects, community **understanding** and **confidence** in a particular project.

This definition was informed by the research and developed with Collaborators to bring consistency to the energy industry's understanding of how social licence is built and maintained. It draws from the definition used by the Australia Renewable Energy Agency (ARENA).²

The above definition "draws from the definition used by the Australia Renewable Energy Agency (ARENA)." Large scale renewable energy projects that have very few, if not no, individuals or organisations that are willing to support them publicly (through EIS and amendment exhibition submissions and/or IPCn public meetings and submissions), without monetary gain, are being approved. Do ARENA and The Energy Charter condone renewable energy developers not seeking, nor obtaining "social licence"?

Why does the term "social licence" not appear to feature in any recent DPHI Assessment Reports?

Community Division

Rural and regional communities rely heavily on volunteers and the age old country philosophies of helping out your neighbours and friends and generosity in times of hardship or catastrophe. Large scale renewable energy developments and transmission line projects have fractured affected communities all over the state, possibly irreparably. Secrecy, deception and bullying are not conducive to functioning and thriving small, tight knit communities nor keeping generational farming families on the land. Will rural and regional NSW, and the agricultural industries survive to feed and clothe our population into the future?

Mental Health Impacts & Lack of Services

From CWO REZ CRG Minutes Thursday 27th April 2023:

- **SE:** How is EnergyCo addressing the mental health concerns of the community? CA advised EnergyCo has no tangible actions at this stage. SE commented the Coolah information session was traumatic for some community members and would like to see this addressed in the future.

The mental health impacts of compulsory acquisition for transmission projects and the CWO REZ as a whole are yet another overlooked negative aspect of the “rapid transition to renewable energy”. The above proves that EnergyCo staff have been aware of the issue for a substantial amount of time. Despite a power of work from concerned community members in late 2023, and throughout 2024, the promises made by Minister Sharpe for additional mental health services have not been delivered.

From Budget Estimates 2023-2024, Portfolio Committee No. 7 – Planning and Environment, Answers to Questions on Notice, Hearing 7th March 2024:

12. Landholder survey – Renewable Energy Zones – Transcript page 17

The Hon JOHN RUDDICK: Minister, back to the renewable energy zones, a lot of these farmers have had a very strong emotional connection to their land. Sometimes they've had it for three or four generations, sometimes longer. I understand last April there was a community meeting, I think, at Dunedoo. EnergyCo was asked about what steps have been taken to keep an eye on people's mental health because of all the stress they're going through and EnergyCo said there is no tangible plan. In other words, there was nothing. It was not a factor. A survey has been done recently and the findings were quite alarming. It was sent to the Minister for Mental Health, Rose Jackson, and I understand that she has sent it to you. I know you get a lot of correspondence, but I was wondering if you have at this stage had an opportunity to look at that survey.

The Hon PENNY SHARPE: Who did the survey?

The Hon JOHN RUDDICK: It was a community – I'm happy to forward it through to you later today. I can read you out the results. I have absolutely no doubt this accurately reflects the stress that a lot of farmers are experiencing.

The Hon PENNY SHARPE: I'm aware that a community member did a survey. I haven't seen the results of that.

The Hon JOHN RUDDICK: It has been sent to you from Rose Jackson.

The Hon PENNY SHARPE: Yes, that's okay. I'm not going to argue with that. That's fine. But I'm just telling you that I haven't personally seen it. It's probably been dealt with. The normal

process in my office would be, if that's come, that would be sent off to EnergyCo for response. The point that I would make, though, is that mental health support through this is actually being taken extremely seriously by EnergyCo, and that there is access for landholders to get support. We are looking at enhancing that support that's available for them, which I think is really important. This is not a matter that people are taking lightly. It's a matter that I personally am taking very seriously. We are going to be providing additional support for landholders in relation to that. In terms of the survey, I can come back to you. There will be a response that'll be provided but I just can't give it to you now.

Answer:

EnergyCo takes the wellbeing and mental health of landowners and affected parties seriously. EnergyCo provides a dedicated Acquisition Manager and Place Manager to help affected landowners work through the practical aspects of the property access and acquisition process.

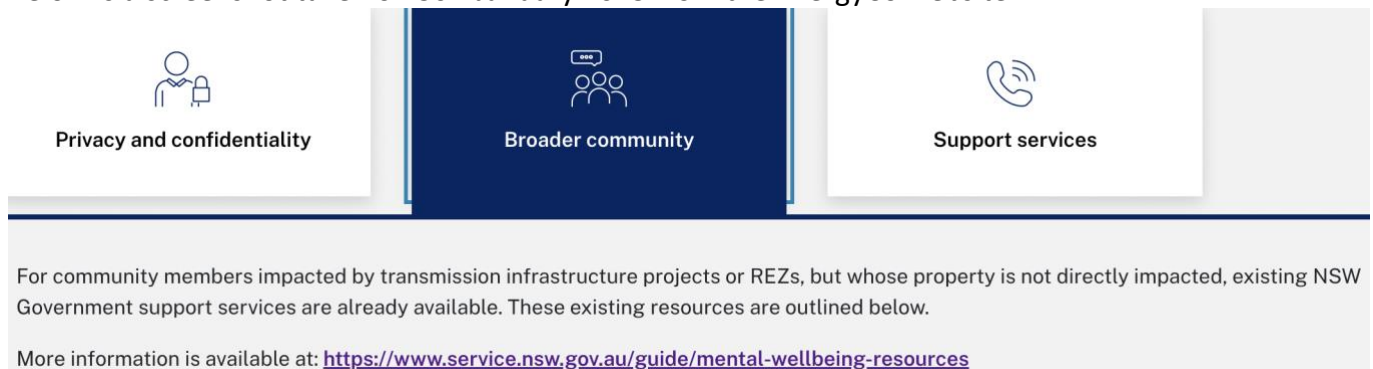
A Property Acquisition Support Line is accessible on 1300 089 551 and open 24 hours a day, seven days a week. The service is free, independent, and confidential.

The support line is delivered by a team of qualified psychologists and social workers. These counsellors can help affected parties develop skills and tools to protect their emotional and psychological wellbeing.

EnergyCo is currently exploring options to expand community wellbeing and mental health support across the Central-West Orana Renewable Energy Zone.

When discussing the possible rollout of mental health services in a meeting with EnergyCo representatives and a Rural Adversity Mental Health Program (RAMHP) Coordinator on 12th December 2023, the community members in attendance tried to impress upon EnergyCo, as had been done in previous meetings, that already oversubscribed existing services should not be burdened with the result of EnergyCo's poor engagement.

Below is a screenshot taken on 30th January 2025 from the EnergyCo website:



It is nice to see our request was heard and respected!!

We also requested that those community members who already had a relationship with a mental health service provider be able to continue that connection through the use of a voucher system facilitated by a third party so EnergyCo was not involved, just footing the bill. Regardless of assurances that mental health support, in the way of ten sessions with a provider of your choice, were communicated, we are yet to see such a program rolled out in the CWO REZ. The only option available specifically for CWO REZ residents is the Property Acquisition Hotline, which although firstly, was never publicly advertised for all of the population, and secondly, was not actually available for all of the population until after mid December 2024 (as communicated to EnergyCo).

According to HealthDirect “Farmers are more likely to have depression and anxiety than other people. More than 1 in every 2 farmers thinks that mental health is a problem or concern in their local community. This can be due to the pressures of farming, together with withstanding challenges like bush fires, floods and droughts.

Your mental health may also be affected by:

- concern about the future of farming
- financial concerns
- family problems
- difficulty finding and keeping good workers
- isolation

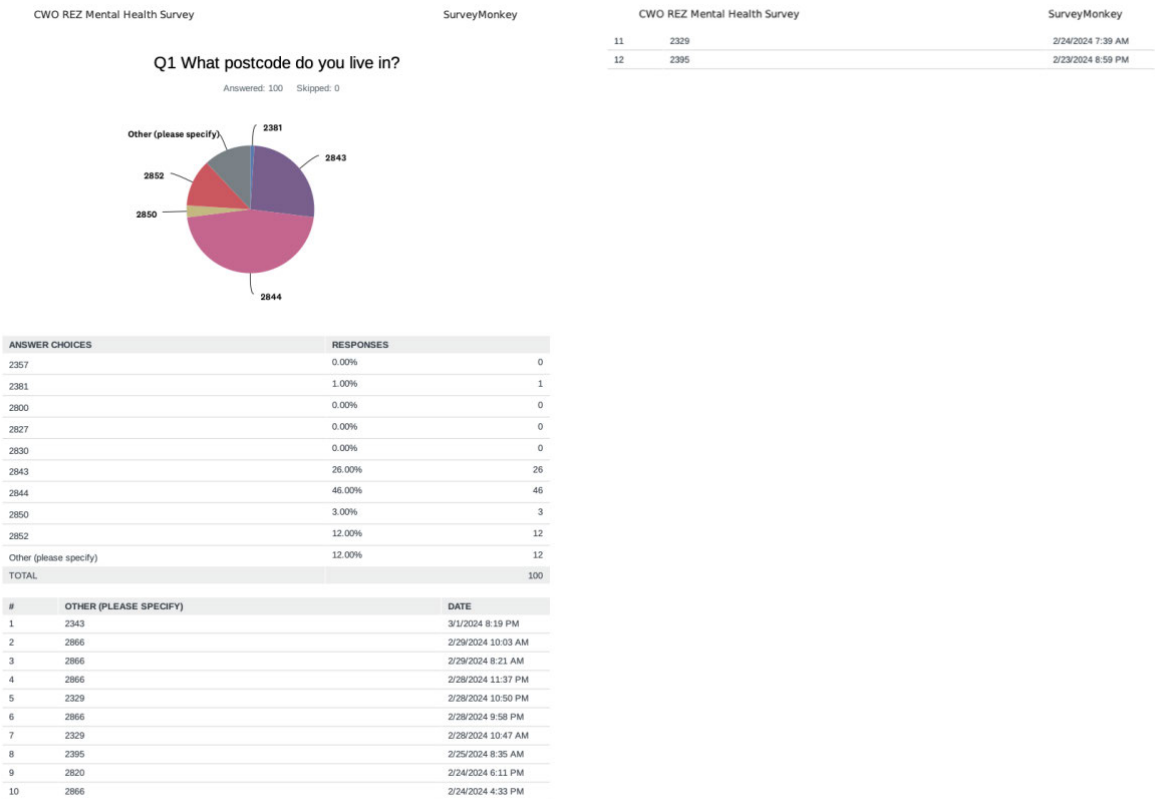
Farmers are often good at helping others but not so good at seeking help for themselves. It can be hard to get mental health support if you are living on a farm. So, it's important to stay connected with other farmers, particularly in tough times. This can be by phone, at community events or by dropping in to help with farm work. In Australia, the suicide rate among farmers is nearly 2 times higher than for non-farmers.”

Not unlike most of the other negative impacts being brought to light throughout the implementation of the REZ and the transmission project, despite the best attempts of community members to highlight the probable issues and prevent the scale of destruction, the mental health impacts will most likely devastate our region and the agriculture industry. One life lost as a result of the ‘unforeseen’ impacts of the “rapid transition to renewable energy” is too many!

CWO REZ Mental Health Survey

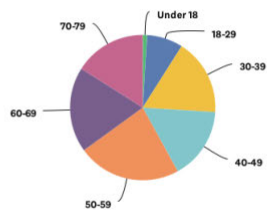
In late February a number of concerned community members took it upon themselves to create a short, anonymous survey to gauge the mental health impacts of the CWO REZ. I found the results particularly frightening and distressing yet, despite this issue being raised since the outset of “consultation” there has been little action taken by EnergyCo to assist affected community members and/or landowners.

Please find the results below.



Q2 What age category are you in?

Answered: 100 Skipped: 0

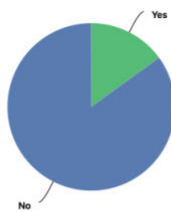


ANSWER CHOICES	RESPONSES	
Under 18	1.00%	1
18-29	8.00%	8
30-39	17.00%	17
40-49	16.00%	16
50-59	23.00%	23
60-69	19.00%	19
70-79	16.00%	16
Over 80	0.00%	0
TOTAL		100

3 / 20

Q4 Do you have an existing, diagnosed mental health condition?

Answered: 100 Skipped: 0

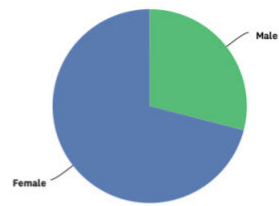


ANSWER CHOICES	RESPONSES	
Yes	15.00%	15
No	85.00%	85
TOTAL		100

5 / 20

Q3 Are you male or female?

Answered: 100 Skipped: 0

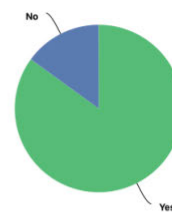


ANSWER CHOICES	RESPONSES	
Male	29.00%	29
Female	71.00%	71
TOTAL		100

4 / 20

Q5 Have you been impacted by the CWO REZ?

Answered: 100 Skipped: 0

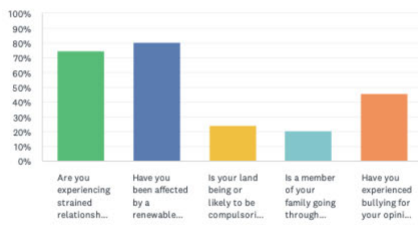


ANSWER CHOICES	RESPONSES	
Yes	85.00%	85
No	15.00%	15
TOTAL		100

6 / 20

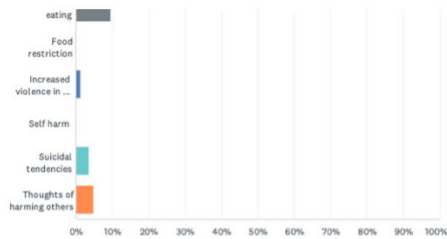
Q6 If yes, choose all that best describe how you have been affected by the CWO REZ.

Answered: 83 Skipped: 17



ANSWER CHOICES	RESPONSES
Are you experiencing strained relationships with family and/or friends and neighbours?	74.70% 62
Have you been affected by a renewable energy project?	80.72% 67
Is your land being or likely to be compulsorily acquired?	24.10% 20
Is a member of your family going through compulsory acquisition?	20.48% 17
Have you experienced bullying for your opinions on the CWO REZ and its projects?	45.78% 38
Total Respondents: 83	

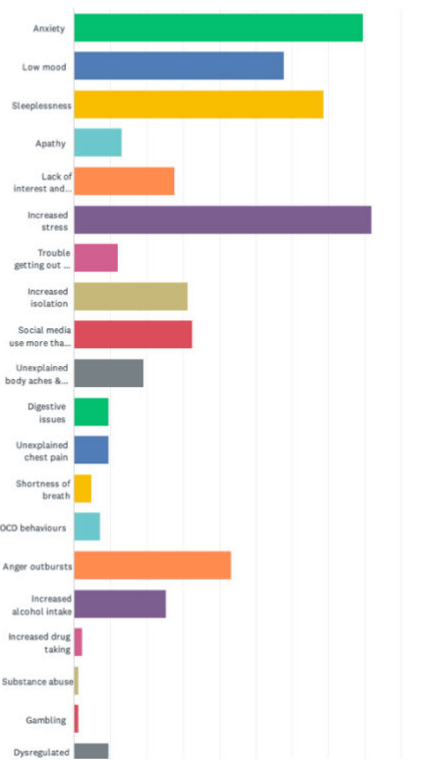
7 / 20



9 / 20

Q7 Select the symptoms you have been experiencing since the CWO REZ was declared (choose all that apply).

Answered: 83 Skipped: 17



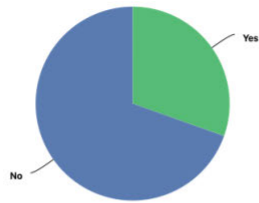
8 / 20

ANSWER CHOICES	RESPONSES
Anxiety	79.52% 66
Low mood	57.83% 48
Sleeplessness	68.67% 57
Apathy	13.25% 11
Lack of interest and motivation	27.71% 23
Increased stress	81.93% 68
Trouble getting out of bed	12.05% 10
Increased isolation	31.33% 26
Social media use more than normal	32.53% 27
Unexplained body aches & pains	19.28% 16
Digestive issues	9.64% 8
Unexplained chest pain	9.64% 8
Shortness of breath	4.82% 4
OCD behaviours	7.23% 6
Anger outbursts	43.37% 36
Increased alcohol intake	25.30% 21
Increased drug taking	2.41% 2
Substance abuse	1.20% 1
Gambling	1.20% 1
Dysregulated eating	9.64% 8
Food restriction	0.00% 0
Increased violence in the home	1.20% 1
Self harm	0.00% 0
Suicidal tendencies	3.61% 3
Thoughts of harming others	4.82% 4
Total Respondents: 83	

10 / 20

Q8 Do you normally seek professional help when your mental health mood is not ok?

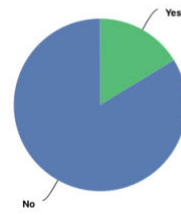
Answered: 92 Skipped: 8



ANSWER CHOICES	RESPONSES
Yes	30.43%
No	69.57%
TOTAL	92

Q9 Have you been able to seek help from a professional health care provider for the issues you are experiencing as a result of the CWO REZ?

Answered: 86 Skipped: 14

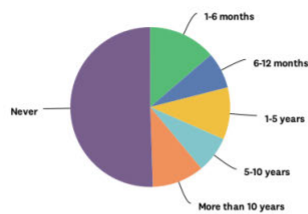


ANSWER CHOICES	RESPONSES
Yes	16.28%
No	83.72%
TOTAL	86

11 / 20

Q10 When was the last time you sought professional help for a mental health issue you experienced?

Answered: 95 Skipped: 5



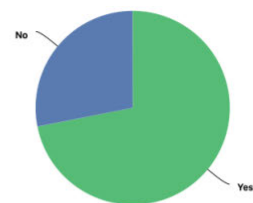
ANSWER CHOICES	RESPONSES
1-6 months	13.68%
6-12 months	7.37%
1-5 years	10.53%
5-10 years	7.37%
More than 10 years	10.53%
Never	50.53%
TOTAL	95

13 / 20

12 / 20

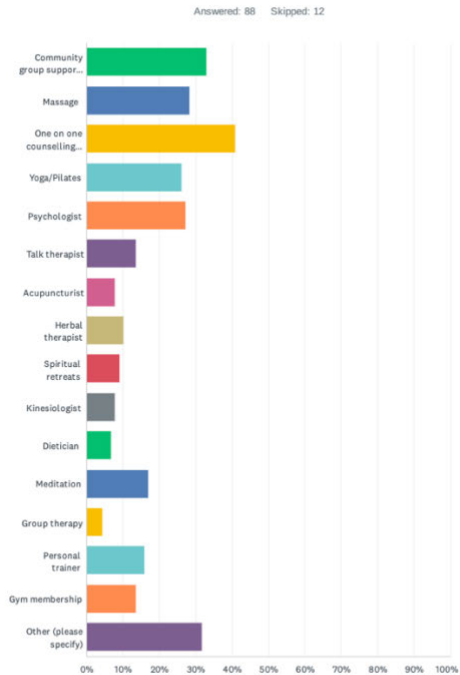
Q11 If there was mental health community support available to you would you access it?

Answered: 89 Skipped: 11



ANSWER CHOICES	RESPONSES
Yes	71.91%
No	28.09%
TOTAL	89

14 / 20

Q12 What would help your mental health the most? Please choose all that apply.

15 / 20

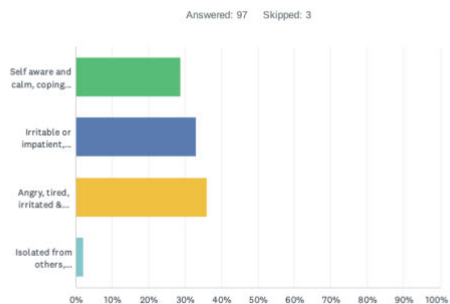
18	No REZ	2/24/2024 2:20 PM
19	CWO REZ going away and leaving us alone	2/24/2024 12:31 PM
20	We are being surrounded by & being forced by the government to attempt to engage & negotiate with 100% profit driven psychopathic multinational renewable energy corporations. We require a mandatory setback requirement of 6km from turbines to people's homes, where corporations can only build within this 6km if they can negotiate a fair commercial agreement with those neighbours. This would significantly reduce several years of uncertainty for the future on the land & our multigenerational properties. At the moment there is no mandatory setback requirement. Therefore turbines are proposed as close as 1km to houses, on ridgelines towering over them up to e.g 3/4km into the air, as corporations want to maximise profit opportunity, and the leave it up to the NSW State Govt to make a call at the very end of the assessment process (several years) to make a call that the turbines are too close & should be deleted from the plan. Even when the NSW Govt makes that call the corporations will be kicking & screaming for them not to be deleted until the final final call is made. This has devastating implications for our mental health. Problem is, a mental health service is not going to help change the outcome of development.	2/24/2024 10:23 AM
21	The CWO REZ and everything that came with it to be abandoned. Better alternatives sought by Government.	2/24/2024 7:28 AM
22	Not to have transmission lines on my property, not to have solar & wind farms built in my area.	2/24/2024 4:49 AM
23	Stop wrecking our homes, land and communities. Put these projects where the people want them.....Sydney.	2/23/2024 10:17 PM
24	Cworez to leave us alone	2/23/2024 8:22 PM
25	No rez in my hometown	2/23/2024 7:55 PM
26	Don't put them in the area full stop	2/23/2024 7:08 PM
27	REZ to go away	2/23/2024 6:51 PM
28	Not having my farm wrecked by neighbors' giant wind monsters	2/23/2024 6:50 PM

17 / 20

ANSWER CHOICES	RESPONSES
Community group support meetings	32.95%
Massage	28.41%
One on one counselling sessions	40.91%
Yoga/Pilates	26.14%
Psychologist	27.27%
Talk therapist	13.64%
Acupuncturist	7.95%
Herbal therapist	10.23%
Spiritual retreats	9.09%
Kinesiologist	7.95%
Dietician	6.82%
Meditation	17.05%
Group therapy	4.55%
Personal trainer	15.91%
Gym membership	13.64%
Other (please specify)	31.82%
Total Respondents: 88	

#	OTHER (PLEASE SPECIFY)	DATE
1	the right to farm without all the REZ bs	3/1/2024 10:17 PM
2	leave us alone, put wind solar transmission in Sydney	3/1/2024 10:17 PM
3	Not having to live near horrible wind turbines	3/1/2024 10:03 PM
4	GET RID OF THE CWOREZ. We do not want wind & solar FACTORIES on our precious FARMLAND. It is uneconomical and will not provide the power needed for heavy industry.	3/1/2024 10:15 AM
5	Get rid of costly, inefficient renewable energy in our pristine agricultural farming area of Dunedoo. We grow food & fibre & should not be expected to "grow" power for the cities who waste it anyway.	2/29/2024 9:50 PM
6	Get rid of the REZ	2/29/2024 12:31 PM
7	Stop the renewable madness	2/29/2024 1:40 AM
8	truth about renewables and carbon costs in manufacture/build	2/28/2024 10:47 AM
9	The REZ being stopped.	2/28/2024 7:03 AM
10	Sheep work	2/27/2024 4:33 PM
11	Remove CWO REZ from my life	2/27/2024 8:59 AM
12	no rez	2/26/2024 6:56 PM
13	No more CWOREZ. No more windfarms or solar farms	2/26/2024 11:02 AM
14	Stress causes low immune response to current community diseases	2/25/2024 7:35 PM
15	REZ to go away	2/25/2024 11:38 AM
16	If the rez was stopped	2/24/2024 8:04 PM
17	CWOREZ be paused and Energyco rectify the mess they have made as it is not possible to do what they say they are going to do.	2/24/2024 6:58 PM

16 / 20

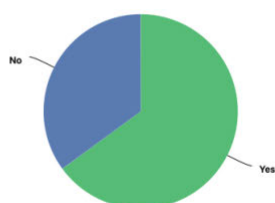
Q13 Right now, what best describes your mental health?

ANSWER CHOICES	RESPONSES
Self aware and calm, coping well & positive outlook	28.87%
Irritable or impatient, overwhelmed, low energy levels, worried or nervous	32.99%
Angry, tired, irritated & frustrated with others, feeling hopeless	36.08%
Isolated from others, aggressive & out of control, depressed, highly anxious	2.06%
TOTAL	97

18 / 20

Q14 Do you know where to go to get mental health help if you felt you needed it?

Answered: 97 Skipped: 3



ANSWER CHOICES	RESPONSES	
Yes	64.95%	63
No	35.05%	34
TOTAL		97

19 / 20

Q15 Are you concerned about the mental health of family members, friends and/or community members?

Answered: 99 Skipped: 1



ANSWER CHOICES	RESPONSES	
Yes	83.84%	83
No	16.16%	16
TOTAL		99

20 / 20

Social Impacts

Rural, regional and remote Australians face a lack of social services for a range of reasons including location, remuneration, workload, perceived lack of entertainment and leisure activities, and isolation, both in general and from family and friends. Our emergency services are stretched, and often heavily supported by volunteer organisations, that are also struggling with dwindling support, such as the State Emergency Service (SES), Volunteer Rescue Association (VRA) and Rural Fire Service (RFS) – it is not unusual for the RFS to get called to assist NSW Ambulance with lifting a patient.

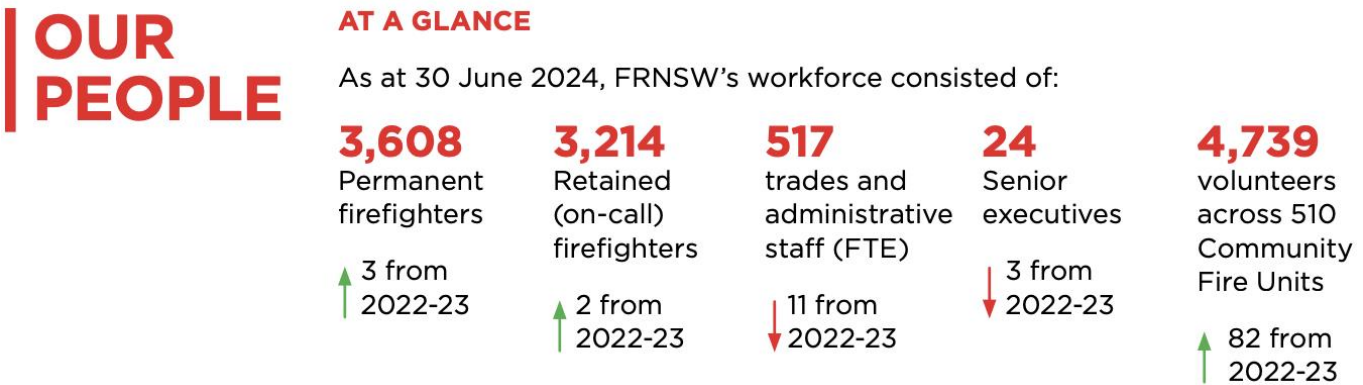
Rural hospitals often do not have a doctor on call, instead relying on Telehealth, or transfers to larger centres to meet the communities needs. Unfortunately, this often leads to extreme waiting times in the larger centres due to the area they are required to service; particularly Dubbo being the main centre for western NSW.

According to a Ministerial release published on the 18th September 2024 “There were 795,817 emergency department (ED) attendances in the April to June quarter, up 3.3 per cent from the same quarter last year and only marginally lower (1.8 per cent) than the record-breaking January to March 2024 quarter. The BHI results show the pressure on NSW EDs coincides with more residents struggling to access care through general practitioners (GPs). The BHI results include new data showing a dramatic net decrease in the number of GP attendances per 100,000 people in NSW between 30 June 2022 and 30 June 2023 – from 754,709 to 653,802. This is the first and most significant decrease in GP attendances in over ten years of BHI reporting. This is consistent with the latest data from the Federal Department of Health & Aged Care which shows there were fewer GPs in NSW in 2023 than in 2019 – falling from 9,700 to 9,485.”

It is not unusual to hear of people in rural towns and now even regional centres being forced to wait weeks, if not over a month to see a GP. While the intention is to have a registered nurse or paramedic at some of the proposed workers accommodation camps for renewable energy infrastructure projects, and the proponents are expecting workers to access non emergency medical services whilst not on site (during their time back at their usual residence) I wonder how that will work in practice given the unforeseen impacts to affected communities already being felt despite assurances against such issues?

Not unlike doctors, it is difficult for rural areas to attract police officers. There are several incentives already available for those willing to become police officers, and special incentives for those willing to work in rural and remote areas. Technically, Police Academy graduates can be mandatorily assigned to locations as probationary constables, but I cannot imagine that they would be sent to a one officer station like Coolah, Cassilis or Dunedoo.

Fire and Rescue NSW “is the State Government agency responsible for the provision of fire, rescue and hazardous material services within NSW” according to the website. There are no permanent firefighters stationed in Dunedoo, Coolah, Wellington, Merriwa, Gulgong or Mudgee and no Fire and Rescue Stations in Elong Elong or Cassilis.



On-call fire fighters are be paid a retainer and for the time they attend incidents and drills but it is in essence a community service, often taking valuable time away from their families and small businesses to assist locals and visitors often in the worse times of their lives.

How will our small, essentially community manned, Fire and Rescue NSW Stations cope with the potential increase in incidents due to the major increases in traffic on local roads, population and housing in the form of workers accommodation, worksite accidents, potential lithium-ion battery and renewable energy infrastructure fires and hazardous material incidents?

The example below of private renewable energy developments’ reliance on local services comes from Wellington North Solar Farm Emergency Plan – June 2022, prepared by Umwelt (Australia) Pty Limited on behalf on Lightsource BP Renewable Energy Investments Limited:

3.0 Roles of External Agencies and the Community

The involvement of state and local government agencies as well as the community in emergency planning is of significant importance to ensure the EP facilitates an adequate response in the event of an emergency.

3.1 Emergency Services

3.1.1 Fire and Rescue NSW

FRNSW is the designated combat agency for land based hazardous materials incidents and rescue.

FRNSW would lead the emergency services response to a hazardous materials incident, including fires involving hazardous materials, at the Development.

3.1.2 NSW Rural Fire Services

RFS is the designated agency for response to fire response located within the facility (with the exception of fires involving hazardous materials) as well as bush and grass fires outside of the Development area. RFS would lead the emergency services response to fires within the facility (with the exception of fires involving hazardous materials) and a bush or grass fire threatening the Development area.

3.1.3 NSW Police Force

The NSW Police Force (NSWPF) is the designated agency for law enforcement and evacuation of persons in the surrounding community. NSWPF would lead the response to Development security threats and assist with evacuation of persons under threat as a consequence of a hazardous event at the Development.

3.1.4 NSW Ambulance

NSW Ambulance is the designated agency for pre-hospital care and transport of sick and injured persons as well as coordination of all health systems involved in emergency response. NSW Ambulance would attend to sick and injured persons during a Development emergency event.

3.1.5 State Emergency Services

The State Emergency Services (SES) is the designated combat authority dealing with natural disasters (e.g., floods) and provide assistance as required to FRNSW, RFS, NSWPF and NSW Ambulance.

It continues to baffle me that those who designed the REZ model did not adequately consider the burden that would be placed on rural and regional communities and our services which are already deficient in many ways, despite community members best efforts and intentions. These issues should have been obvious, and there should have been plans in place prior to the rollout of the REZ model so as not to negatively impact the REZ communities.

Should the REZ rollout be paused until these services are up to standard to cater for what is planned? Will going ahead without sufficient plans risk the safety of both locals and the incoming workforce and the whole region in general?

Roads, Transport & Traffic

Community members and landowners have been raising concerns regarding the enormous proposed increase in traffic, especially heavy vehicles and OSOM loads, given the number of projects within the CWO REZ, more specifically clustered around Dunedoo, Gulgong, Coolah and Elong Elong that are currently approved and/or still in planning, the state of the roads in the region generally, and the potential safety impacts to locals and livestock as a direct result of the CWO REZ traffic.

As stated previously, the Golden Highway is effectively a funnel from the majority of Western NSW to the Port of Newcastle and vice versa. A large proportion of grain produced in the west of the state is transported to the Port, huge amounts of fertiliser and other agricultural products are transported west, and in between that countless local landowners use the road with agricultural machinery, to cross

livestock and for general travel, plus tourists and travellers use the Golden Highway to traverse the state. Causing a bottleneck of OSOM loads and heavy vehicles will impact locals and travellers alike.

There are several small towns located along the Golden Highway, along the Port to REZ route including Jerrys Plains, Denman, Sandy Hollow, Merriwa and Dunedoo. The route, including OSOM loads, makes its way through the main street, and business centre, of Jerrys Plains, Sandy Hollow, Merriwa and Dunedoo.

From CWO REZ CRG Meeting Minutes 30th January 2023:

- SE: How will traffic impacts be mitigated through Merriwa town centre? JG: EnergyCo is discussing with Transport for NSW about what upgrades may be required for the Golden Highway to facilitate oversize/overmass vehicle movements. Looking at options such as alternative routes however this requires further engagement with Transport for NSW, councils and generators to coordinate the approach. We know Denman is one of the constrained areas that is being looked at closely.

From CWO REZ CRG Meeting Minutes 27th April 2023:

In regards to OSOM traffic and Merriwa and the Golden Highway, could EnergyCo list the community stakeholders they working with in Merriwa and the Upper Hunter?

Community consultation has not yet been carried out on oversize and over-mass (OSOM) vehicle movements between the Port of Newcastle and the REZ. For context on timing, OSOM movements are expected to start from 2025. We are still in the initial planning stages for OSOM deliveries and we are consulting with key stakeholders to understand the community impacts from these activities.

Discussions are in progress with Transport for NSW, the Department of Planning and Environment and Candidate Foundation Generators to confirm the scope, approval pathway and delivery of this work. Consultation will be carried out with affected communities once further details are confirmed.

We encourage community members to contact us at any time if they would like to discuss the current status of this work.

I would be surprised if a portion of the population higher than 10% were aware of what is proposed to traverse the main street of their towns at this stage (January 2025). The information that can be provided by EnergyCo's Port to REZ team and TfNSW at this stage, considering the works are to begin in the near future is lacking any detail and therefore in effect, useless to community members and affected landowners.

As indicated in the Port to REZ section of my submission, community has always been told that the OSOM loads, especially wind turbine components, would be transported overnight. While this has been questioned for some time, particularly seeing as the modules for the Crudine Wind project were often seen at the Golden Highway/Castlereagh Highway intersection mid-morning, it had not been confirmed until the Dunedoo Markets in December 2024. Yet another community concern that was dismissed through consultation but has been substantiated as construction looms!

From EnergyCo's CWO REZ Project Update December 2023:

Port to REZ

Delivering new high-capacity transmission infrastructure for the Central-West Orana REZ and Hunter-Central Coast REZ will require transportation of large renewable energy components, such as wind turbine components and transformers for transmission, from the Port of Newcastle.

EnergyCo is working with Transport for NSW to coordinate minor road work and transport corridor modifications along the Port to REZ route to ensure the state road network can accommodate Over Size Over Mass (OSOM) vehicle movements for the Central-West Orana REZ transmission project and major generation projects with planned connections to the REZ.

Surveying and early investigation work for the Port to REZ alignment was completed in mid 2023 to inform our planning for the road upgrades. EnergyCo is now developing the design and planning documentation together with Transport for NSW for the road upgrades, with works due to begin in late 2024.

To reduce impacts to road users, many of the largest components will be moved overnight. To assist transport planning, EnergyCo and Transport are beginning to engage with councils and stakeholders along the route and this will continue through 2024.

What we now know is that EnergyCo is only concerned about reducing impacts to road users in metropolitan areas. It was suggested at the Dunedoo Markets that OSOM loads move during the night and not at all during the day; apparently that is a preposterous idea. It was also suggested that OSOM loads leave the Port in the afternoons so they would be travelling through rural towns at night; also a ridiculous idea according to EnergyCo and TfNSW staff – we couldn't possibly impact an urban area at that time of day!

Have road Hunter Expressway road users been notified that OSOM loads will be using the east bound lane to access the road from John Renshaw Drive?

Have users of the Golden Highway around Mount Thorley been informed that the eastbound turning lane will be used for OSOM loads to turn from the Putty Road to the Jerrys Plains Road?

Have all of these road users been told that there are nearly one thousand wind turbines proposed for the CWO REZ, meaning a potential nine thousand OSOM loads, all of which will use this route?

If the “rapid transition to renewable energy” was adequately planned and designed there would be countless improvements made to the Port to REZ route prior to any works beginning on the transmission project or any private developments so as to ensure the safety of the population. Instead, what we have is a rushed, poorly designed and executed plan that I can guarantee will end in disaster; whether that be road casualties, the loss of agricultural production and economic benefits, and/or failing infrastructure.

Golden Highway near Cassilis:



Merriwa Main Street (Golden Highway):



Dunedoo Main Street (Golden Highway):



Collaroy Bridge over Krui River:



From the October 2016 Golden Highway Corridor Strategy:
“The bridge over the Krui River is 6 m wide, providing 2.8 m travel lanes in each direction, narrower than the recommended minimum width of 8.4 m. In the short-term improvements such as enhanced delineation (including vehicle activated signs), and a reduced heavy vehicle speed limit should be undertaken. It is also recommended that a separate investigation commence to assess potential improvements such as bridge widening or replacement.”

From the October 2016 Golden Highway Corridor Strategy:

Table 5.28 Pavement age total length km

Corridor Planning Sections	< 20 years	20-40 years	> 40 years	Section length (km)
1. Belford to Mt Thorley	1.2	10.1	2.1	13.4
2. Mt Thorley to Jerrys Plains	3.3	11.2	8.9	23.4
3. Jerrys Plains	-	5	5.1	10.1
4. Jerrys Plains to Denman	4.6	2.1	11.9	18.6
5. Denman	1.3	3.7	-	5.0
6. Denman to Merriwa	3.5	24	18.8	46.3
7. Merriwa	0.5	1.3	0.9	2.8
8. Merriwa to Dunedoo	24.2	34.7	43.3	102.2
9. Dunedoo	-	-	4	4.0
10. Dunedoo to Dubbo	35.3	21.1	26.6	83
11. Dubbo	2.6	1.4	0.5	4.5
Total (by length km)	76.8	115.3	121.2	313.3

The majority of the oldest pavement is located between Merriwa and Dunedoo – how will the Golden Highway road surface cope with the proposed traffic increases?

The CWO REZ transmission main energy hub is located along Merotherie Road. As previously mentioned, community and landowners have been questioning the appropriateness of the location of this site since information of its proposed placement became publicly available. 1.7km of the access route to the main energy hub, along Merotherie Road, is Talbragar River flood plain. With the current design of the gravel road, sporadically maintained by Warrumbungle Shire Council, floodwater comes up, crosses the flood plain and subsides without serious or long-lasting disruption to agricultural activities. Upgrades comprised of culverts and other engineering solutions, to account for the road being raised significantly, will cause delays in the movement of water upstream and intensify and concentrate flows downstream resulting in significant erosion and reduction in available agricultural land. Not to mention the potential impacts of road sealant being washed into neighbouring paddocks and into the Talbragar River and downstream. No amount of desktop flood “modelling” will inform those designing the road upgrades of the true movements of flood water risking irreversible impacts to the flood plain and the whole Talbragar River System.

The CWO REZ transmission EIS stated “Merotherie Road was inaccessible during the time of survey due to a major flooding event, which resulted in no traffic volumes recorded on the road”. Did that not raise red flags for the designers of the project, or even those responsible for conducting environmental studies?

Talbragar River in flood – photo taken at the Leo Nott Bridge:



From CWO REZ CRG Meeting Minutes 17th October 2023:

- DT enquired as to whether engineering/flood studies for the proposed road upgrades have been done as the country contains black soil, and whether a causeway is needed on Merotherie Road. A wet season can make it difficult to get vehicles along Merotherie Road.
- SB advised modelling of proposed upgrades has occurred, which is normal at this stage of the project. In terms of flooding and passage of water over the road, increasing the height of Merotherie Road for 1:100 flood event would result in embankments and is not being considered. PJ further advised that the project is at design concept stage, and it is not appropriate to raise the road height. The intention is to provide a road foundation that can support traffic and not deteriorate.

During the last discussion I had with the ACERES team regarding the design of the Merotherie Road through the flood plain it was assumed the road would be raised by approximately 400mm.

An accident that occurred on Merotherie Road in June 2024:



There are countless landowners whose properties are split by the Golden Highway forcing them to walk livestock across the road to gain access to feed and water. During negotiations with then RMS regarding the Golden Highway upgrade in the late 2000's we suggested that the installation of an underpass for crossing our stock would be a sensible idea – negating the safety concerns for both road users, our livestock and ourselves given the number of close calls we have had during stock crossings due to drivers' failure to stop.

The following is an email sent to Warrumbungle Shire Councillors, and the Council staff regarding an incident at my property in August 2023:

"Dear Warrumbungle Shire Councillors,

I own a property approximately 8kms east of Dunedoo that is divided by the Golden Highway. We regularly walk stock (sheep and cattle) across the highway. At about 3.40pm on Tuesday 15th August, Mum and I were crossing a mob of cattle when a Warrumbungle Shire Council ute failed to stop, swerving at the last minute to miss hitting our cattle. Our fold out signs, installed by the then RMS when the section of the Golden Highway was upgraded, were open and we had waited for a break in traffic before making our crossing. Mum was on the western side of the mob of cattle and saw the ute approaching, and not slowing, so stayed off the road, and in doing so avoided being hit. The driver was lucky not to end up off the road and in the culvert, and even luckier that the vehicle stopped on the eastern side of our cattle (our neighbour) had left plenty of room therefore avoiding a head on collision. Even after this incident the Warrumbungle Shire Council employee did not stop.

I rang the Warrumbungle Shire office in Coonabarabran straight after the incident to report it. I was told someone would ring me the next day to discuss it. From memory I rang two or three more times to try to get some answers before Kylie Kerr rang me on the 24th August to tell me she had identified the driver, investigated the incident and taken the appropriate action. She would not tell me what the action was due to privacy concerns. It did not instil confidence in me when Kylie, the manager of road operations for the shire, asked me if I had done training to stop traffic for road crossings - she clearly isn't aware of the road rules surrounding crossing stock (drivers must give way to farm animals on the road).

I have since sought legal advice and have been told that because I don't know who the driver was privacy is not an issue. I would just like to know that some action has been taken against the driver as his behaviour was very dangerous and it was just pure luck that no person or animal was injured or killed! I am not impressed that my rates are being used to fund someone driving in the manner this man was on that day.

Since the 24th August I have tried to make contact with Kylie Kerr at least twice. She will not take nor have the common courtesy to return my phone calls.

I would appreciate some action on this matter.

Regards,
Emma Bowman”

Below are photos of our stock crossing signs (fold out, secured by a padlock), the line of site from Craboon to our stock crossing and some cattle crossing the Golden Highway:



If the traffic stops and we have safe passage it normally takes a minute or two at most to cross a mob of cattle or sheep across the Highway. We try to have three people on motorbikes in attendance, one person on either side of the mob crossing the road to stop the traffic and another pushing the livestock across. Unfortunately having three people isn't always possible so we often only have two – I don't know if I would be game to attempt crossing stock by myself given the incidents we have had to date. The lack of common sense and patience of some people is astounding! I fear how we will get our stock across the road safely in the future.

How many accidents will have to occur on the Golden Highway, or any of the other local roads being used by renewable energy developers and EnergyCo/ACERZ before something is done about safety? Why not prevent the accidents rather than leaving local authorities to clean up the mess?

Bushfire Risk & Limitations to Firefighting

There is a lot of information contained in my submissions to Environmental Impact Statements in regard to bushfire risk and limitations to firefighting but I cannot stress enough how big an issue this is when considering the plans for the CWO REZ as a whole. The cumulative impact of having one thousand wind turbines, hundreds of kilometres of transmission lines and thousands of hectares of solar panels within the region is frightening given the bushfires we have experienced in the past.

I don't think I can adequately explain what the Sir Ivan Bushfire, which ravaged the region in February 2017, took from our farmers and communities. The memories are still so raw for people and the land is still recovering, and will be for a long time.

The shortcomings of the Rural Fire Service (RFS) bureaucracy were on full display during Sir Ivan, just as they were during the Wambelong Fire near Coonabarabran just a few years prior. Whilst fighting the fire in our private fire truck we requested assistance from an RFS unit, after taking our water they proceeded to park the truck under a tree, when questioned about this decision we were informed they had been ordered not to conduct any active firefighting – why were they even there? I also understand aerial assistance was requested several times in the early stages of the fire, prior to it reaching the heavily timbered country, but was denied. I can only imagine what a different outcome there would have been if Sir Ivan was contained prior to the hot, windy weather on the second day.

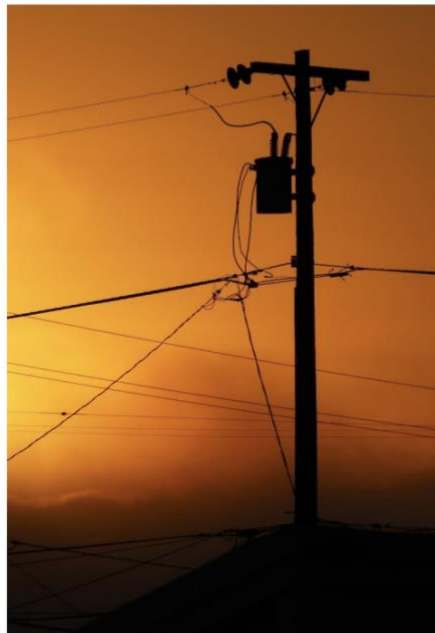
Community concerns regarding bushfires and potential limitations to firefighting operations are often dismissed due to the RFS not raising any objections to projects during the planning process. Not only are there issues with access due to infrastructure but another whole range due to lithium-ion batteries and potential toxicity and contamination issues when considering the materials used to manufacture solar panels and wind turbines.

From Essential Energy's 2024-2025 Bushfire Safety Kit:

Fire safety near powerlines

For your safety, when there is a fire close to a powerline, remember:

- Keep people, vehicles and high loads at least 25 metres from the powerline.
- Don't stockpile, windrow or heap combustible material under powerlines.
- Exercise caution if using powerline easements to access fire locations, as readymade firebreaks, as a break from which to commence back-burning operations, or as a refuge area in a firestorm.
- Smoke can act as a conductor – fires burning on or near powerline easements can greatly increase the chances of a flashover occurring.
- Electricity, especially at high voltages, can 'jump' across several metres of air gap. This means that direct contact with the high voltage powerline is not required to produce a potentially fatal event.
- Flashover may occur between powerlines or from powerlines to the ground or structures through burning vegetation (this may be seen as a flash or heard as an explosion)



STAY AWAY FROM FALLEN OR SAGGING POWERLINES

In the event of a bushfire, property owners who decide to leave their property are advised to do so early to minimise the risk of encountering fallen or sagging powerlines across roads and other hazards.

Powerlines can sag lower in times of high demand, high temperature and fires which can reduce ground clearances.

LITHIUM-ION BATTERY FIRES

FRNSW has seen a significant increase in lithium-ion battery fires with more than 300 incidents in 2023-24, a 60 per cent increase on 2022-23. There were 35 injuries from lithium-ion battery fires in the last year and NSW recorded its first two fatalities due to lithium-ion battery fires in 2024.

FRNSW statistics indicate that people are four times more likely to be injured by a fire which originates from a lithium-ion battery in comparison to other fire types.

Lithium-ion batteries – the most common batteries used in rechargeable devices including laptops, mobile phones, e-bikes, e-scooters, power banks and power tools – can malfunction due to inherent faults or external factors, leading to significant

and rapidly developing fire hazards.

Fires involving lithium-ion batteries differ from other types of fires as battery cells undergo a process known as thermal runaway, a self-propagating fire that is challenging to extinguish and can reignite.

FRNSW has developed a specific training program and continuously reviews its operational guidelines to address the unique challenges posed by lithium-ion battery fires.

FRNSW led the development of a range of educational materials on lithium-ion batteries and is also leading a collaborative research program on the Safety of Alternative and Renewable Energy Technologies (SARET) to better understand the hazards posed to the community and firefighters by lithium-ion batteries.

PLANS FOR 2024-25

- Review and update operational procedures for operations in rail corridors, tunnels and high and medium rise building fires.
- Update operational guidelines for new hydrant systems.
- Review and update operational procedures for incidents involving photovoltaic (PV) array/solar including commercial and grid scale installations.
- Rollout hydrogen awareness training (developed in conjunction with the Australasian Fire and Emergency Service Authorities Council (AFAC) and Deakin University) for firefighters to ensure crews have the skills to work safely

around hydrogen as its use is expanded as part of the energy transition.

- Review and update operational procedures for incidents involving electric vehicles including electric vehicles within structures and at charging stations.
- Work with Transport for NSW to develop an electric vehicle (EV) recovery trailer for protracted incidents involving EV batteries to minimise impacts on the road network and to the community. Transport for NSW will own and deploy the asset which FRNSW can load affected EVs into.
- Advocate across industry and government to support the safe rollout of new technologies within our communities.

- Work with the FRNSW Safety of Alternative and Renewable Energy Technology (SARET) program to maximise learnings for operational response to battery fires to inform capability development.
- Collaborate with AFAC member agencies to develop a national EV training package for emergency responders.

SOLAR PANEL FIRE AT SYDNEY OLYMPIC PARK

On 13 May 2024 FRNSW firefighters responded to a solar panel fire at Sydney Olympic Park Aquatic Centre in Homebush. Upon investigation, crews found a working fire in the solar panels on the roof of the sporting facility. Firefighters quickly got to work and utilised a ladder platform to attack the flames. The blaze was contained within approximately 45 minutes.

A swimming carnival was in progress at the centre at the time of the incident however all people (more than 2,500) were evacuated safely and there were no reported injuries. Investigations are underway to determine the cause of the fire.



Will RFS volunteers be expected to conduct a whole new level of training to deal with the range of different fires that could break out following construction of these projects? How will the extra pressure, and workload, placed on volunteer and FRNSW rural firefighters be mitigated?

According to the CWO REZ Transmission Response to Submissions document:

“Transmission lines would not prevent aerial firefighting activities from being carried out. Transmission lines are generally clearly visible from the air even when there’s smoke. It is noted that the RFS assesses each fire operation on a complete set of conditions for each individual occasion.”

Again, bureaucracy dictates the outcome of consultation on impacts that effect local communities and contractors. How many pilots will have to be killed before aerial firefighting activities are not permitted within a certain distance from high voltage power lines?

I have spoken to two pilots who contract to RFS, flying aerial firefighting sorties, during the fire season. Both have declared they will not be undertaking any aerial firefighting activities in the vicinity of a wind project. Given RFS does not directly employ any pilots to my knowledge, I believe it is only a matter of time before wind projects also become a “no fly zone” during a bushfire.

The below from Wellington North Solar Farm Emergency Plan – June 2022, prepared by Umwelt (Australia) Pty Limited on behalf on Lightsource BP Renewable Energy Investments Limited makes all the issues community members and landowners regarding fire fighting resources and training for employees and the burden these developments will have on local emergency services, especially volunteer organisations, a reality:

5.0 Facility Emergency Resources

5.1 Construction

During construction the emergency features and equipment will include:

- A primary emergency control centre located at the construction compound site office adjacent to the primary site access point. If the main construction compound site office is inaccessible due to the emergency the central construction compound site office will be used if safe assessed as being safe to access and evacuate from. If the central construction compound is inaccessible due to the emergency, the emergency response will be coordinated from the main emergency assembly point if assessed as being safe to access and evacuate from or alternate as directed by the Chief Warden.
- An induction program to ensure all LSbp, contractors and visitors attending the construction site understand the construction site hazards, are aware of their responsibilities in an emergency and are aware of the emergency evacuation routes and muster points relative to their work location.
- An emergency alarm system that will consist of:
 - Air horns located at each construction compound to indicate the need to evacuate.
 - UHF radios to communicate ALERT, EVACUATE and ALL CLEAR messages to personnel, contractors and visitors located remotely from the construction compounds.
- A sign in register requiring all personnel, contractors and visitors who attend site to provide contact details.
- All groups of personnel, contractors and visitors will be required to have a UHF radio switched to channel 25 when working remotely from the construction compound to ensure they are contactable in the event of an emergency.
- Provision of fire extinguishers (dry chemical powder and carbon dioxide) and fire blankets at the construction compounds.
- A 1,000 L water cart (with petrol powered water pump and fire hose) will be maintained on-site to provide a mobile fire water source to be on standby at locations where hot work is being undertaken.
- Provision of first aid kits at the construction compounds.
- Provision of spill kits at the construction compounds.
- All vehicles and mobile plant must be equipped with a dry chemical powder fire extinguisher and first aid kits.
- For works where chemical spills have been identified as a risk, an appropriate spill kit will be maintained at the works location for the duration of the works.
- All hazardous materials will be stored in accordance with relevant standards and guidelines (e.g., AS 1940 – 2017 The storage and handling of flammable and combustible liquids).

Figure 5.1 presents the emergency evacuation diagram for the construction phase of the Development and shows the locations of Development area hazards and emergency features including the emergency evacuation paths, emergency assembly areas, firefighting equipment and first aid kits.

Emergency Plan
21894-06_LSbp_Wellington North SF_EP_FINAL_V5

Facility Emergency Resources
21

5.2 Operation

During operations, the emergency features and equipment will include:

- A primary emergency control centre located at the O&M Facility site office. If O&M Facility site office is inaccessible due to the emergency, the emergency response will be coordinated from the main emergency assembly point if assessed as being safe to access and evacuate from or alternate as directed by the Chief Warden.
- An induction program to ensure all LSbp, contractors and visitors attending the construction site understand the construction site hazards, are aware of their responsibilities in an emergency and are aware of the emergency evacuation routes and emergency assembly areas relative to their work location.
- An emergency alarm system that will consist of:
 - Air horns located at the O&M Facility to indicate the need to evacuate.
 - UHF radios to communicate ALERT, EVACUATE and ALL CLEAR messages to personnel, contractors and visitors located remotely from the O&M Facility.
- A sign in register requiring all personnel, contractors and visitors who attend site to provide contact details.
- All groups of personnel, contractors and visitors will be required to have a UHF radio switched to channel 25 when working remotely from the construction compound to ensure they are contactable in the event of an emergency.
- The site will be equipped with a 20,000 L fire water tank with a 65 mm Storz fitting and FRNSW compatible suction connection located adjacent to the main emergency assembly point (site access off Goolma Road).
- The site will be monitored by CCTV and have security fencing around its perimeter, as shown in Figure 2.2 of this EP.
- Provision of fire safety equipment in accordance with relevant codes and standards (e.g., fire extinguishers and fire blankets) at the Operations and Maintenance Facility (O&M Facility), substation, inverter stations, intermediate kiosks/feeders if applicable.
- Provision of first aid kits at the O&M Facility.
- Provision of spill kits at the O&M Facility.
- All vehicles and mobile plant must be equipped with a dry chemical powder fire extinguisher and first aid kits.
- For maintenance works where chemical spills have been identified as a risk, an appropriate spill kit will be maintained at the works location for the duration of the works.
- All hazardous materials will be stored in accordance with relevant standards and guidelines (e.g., AS 1940 – 2017 The storage and handling of flammable and combustible liquids).

Figure 5.2 presents the emergency evacuation diagram for the operation phase of the Development and shows the location of Development area hazards and emergency features including the emergency evacuation paths, emergency assembly areas, firefighting equipment and first aid kits.

Emergency Plan
21894-06_LSbp_Wellington North SF_EP_FINAL_V5

Facility Emergency Resources
22

Farmers' safety and productivity should not be impacted by the "rapid transition to renewable energy", now should the burden of protecting workers camps and renewable energy developments be placed on local landowners and business owners. Throwing money, in the form of "community benefits", will not remedy the situation; what is needed is individual projects, or a whole of REZ coordinated approach to being prepared for bushfires without impacting the current residents of the area.

Impacts to Agriculture

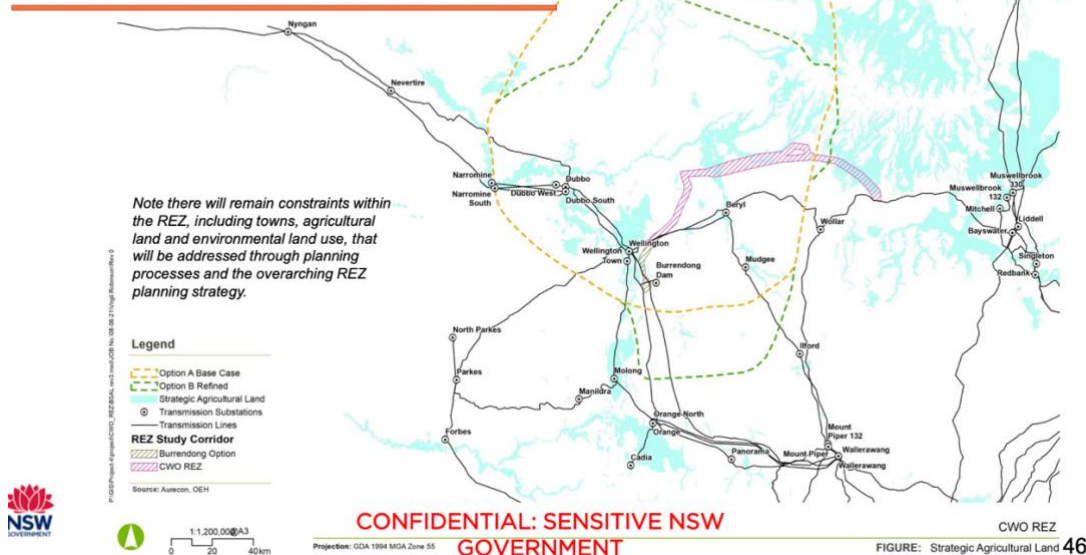
According to the Department of Primary Industries' Agriculture Industry Snapshot for Planning, August 2020, the Central West Slopes and Plains Sub Region is "particularly important for broadacre cropping, beef, sheep and wool, cotton and dairy." It has "ideal growing conditions with evenly distributed rainfall combined with suitable soils, excellent land capability, and access to water resources for irrigation enabling highly productive farms to prosper." "The Central West Slopes and Plains also has a geographical advantage given its proximity to Newcastle and Sydney and access to Brisbane, traversed by major national road and rail routes."

The Central West Slopes and Plains is an integral part of NSW's agricultural industry. Known as a safe, tightly held farming region it is responsible for a large portion of NSW's food and fibre production. While renewable energy developers and Government agencies suggest large scale renewable energy infrastructure projects will not have a negative impact on agriculture, not unlike the advice regarding many other potential impacts, I am not convinced. There is a lot more information covering this topic in my submissions below.

If these projects are to proceed, transmission included, there should be independent baseline soil and water testing carried out prior to works commencing, and monitoring thereafter to ensure no negative impacts will be felt.

CWO Regional Reference Group EnergyCo PowerPoint Presentation June 2021:

Strategic Ag. Land (BSAL)



Biophysical Strategic Agricultural Land is NSW's most productive and valuable farming land. To take any of it out of production for the purposes of energy infrastructure is a crime!

Biosecurity & Land Management

Biosecurity has become a major issue in NSW and Australia with the threat, and introduction of a number of pests and diseases that will threaten agricultural production across the country. Noxious weeds are becoming a huge issue throughout the state and are being spread rapidly through vehicle, fodder and livestock movements. EnergyCo and ACERZ must be strictly monitored by an independent organisation to ensure all protocols are being followed so as not to cause any biosecurity issues in the region throughout the construction phase of the transmission project. EnergyCo must also be responsible, as REZ infrastructure planner, for the adherence of private renewable energy developers to the same strict standards.

As previously mentioned, my property is split by the Golden/Castlereagh Highway and the Wallerawang Gwabegar Railway Line. Both of these areas are a harbour for weeds and a major fire hazard. We, as the landowners neighbouring this Government owned land are left to bear the cost, and burden, of conducting weed control and hazard reduction.

Gwabegar Railway Line (area maintained by landowner on the left, maintained by ARTC on the right – generally slashed once a year):



Golden/Castlereagh Highway (area maintained by landowner on the left, area left unmaintained by TfNSW on the right):



Surface Water, Ground Water & Erosion

Water is the most precious resource relied upon by the agricultural industry. You can produce livestock without feed, as evidenced throughout the many droughts endured by Australian farmers but you cannot without water, and there is no way to grow a crop without water. I have raised the issue of potential impacts to surface and ground water in countless meetings, submissions and drop in sessions – again the response is always that there will be no issues, confirmed by the appropriate Government agency. I often wonder if we will be notified of impacts to our underground water before it is too late or will I go to the bore pump one day and find it pumping dry. There will be no Government support for me the day I find my bore, which waters a large percentage of my six hundred cattle and twelve hundred

sheep (all of them in drought conditions), and no repercussions for the company, companies, or Government authority that may have caused it.

There is also the issue of potential contamination from renewable energy infrastructure components such a wind turbines, solar panels, transformers and batteries etc. I found Warrumbungle Shire Council’s response to this issue interesting considering on every other occasion I have raised this issue there has never been mention of “clean” and “dirty” water.

Question

2.1 Can Warrumbungle Shire Council staff and councillors, and the applicant, guarantee there will be no erosion or sediment issues that negatively affect any adjoining, or downstream property as a result of the proposed project?

Premise’s Hydrologic and Hydraulic Assessment of the project states “a catchment area of approximately 345.6 hectares drains through the proposed solar farm site area, which will cover an area of approximately 35 hectares”. That run off then flows into the Talbragar River and on to the Macquarie River. Any hazardous substances have the potential to pollute downstream water systems and have negative effects on ecosystems. There are no mitigation measures that will be adequate AFTER an incident has occurred.

2.2 Can Warrumbungle Shire Council staff and councillors, and the applicant, guarantee there will not be any contamination attributable to the project?

WSC Response

accumulation of runoff water has the potential to cause rills or sheet erosion if the site has not achieved or maintained 70% ground cover. During construction regular inspections for progressive stabilisation, erosion and sedimentation will be included within the CEMP and will include monitoring and implementing mitigation measures to control any developing issues, as per the requirements of the Consent Conditions. The CEMP will also include an Erosion and Sediment Control Plan which will detail the design of the site, to prevent discharge of polluted waters, in accordance with the NSW Blue Book. The Project is required to comply with the Protection of the Environment Operations Act (POEO) which prohibits the pollution of waters.

2.2 The Erosion and Sediment Control Plan will likely include measures to prevent the mixing of ‘clean’ (before entering the Project site) and ‘dirty’(after entering the Project site) water. Industry standard is to construct a hydraulic diversion on the upstream side/s of the Site to direct ‘clean’ water around the site. Therefore, the bulk of the catchment runoff will not interact with the site or any potential contaminants. This Plan will also include wet weather and flood shut-down procedures, including management of the risk of a pollution event. The Project will develop an Environmental Incident and Complaints Management Plan, which will detail procedures for spill clean-up and remediation. The Project will keep records of incidents and will be subject to external inspections by Councils Authorised Officers.

I do not believe large scale solar projects divert water around their sites – Birriwa Solar has a number of watercourses running through that I don’t believe are being diverted, in fact would be impossible to divert meaning “dirty” water will be running to the Talbragar River and then out to the Macquarie Marshes.

From CWO REZ CRG Meeting Minutes 23rd July 2024:

- Update on the proposed workforce accommodation in Merotherie and Neeleys Lane. ACE REZ investigating water supply options, geotechnical bore holes have been carried out, awaiting results.

ACTION: Agenda item for next meeting – potential water supply for Merotherie Accommodation Camp.

From CWO REZ CRG Meeting Minutes 22nd October 2024:

4	Business arising from last meeting (23/7/24) Minutes finalised on 21/8/24	Chair	Closed actions <ul style="list-style-type: none">• Investigate microwave sites and fire safety parameters.• Share Commonwealth project determination once public.• The eligibility of the Wollar Progress Association to apply for Community & Employment Benefit Program funding.• <u>Provide information on water supply for Merotherie Workforce Accommodation.</u>
ACEREZ presentation	TS		<ul style="list-style-type: none">• Presentation included Central-West Orana industry and Aboriginal engagement, landowner engagement and Property Access Plans, Merotherie workforce accommodation, water supply and bushfire management. It was reported that all easements have now been acquired.

Merotherie workforce accommodation	<ul style="list-style-type: none"> • There are no updates regarding Neeleys Lane workforce accommodation. • First Aid and Emergency Management arrangements for the Merotherie site include access to telehealth doctors, on-site nurses, a paramedic and “first aid vehicle”. • Conditions can be placed on construction subcontractor agreements to ensure Merotherie workforce accommodation is utilised to assist with minimising impact on local housing availability. • Parking will accommodate 600 light vehicles and 100 buses. Workers will be transported to and from the site and town. It is proposed to bus workforce from Sydney and Central Coast. • ACEREZ plans to upgrade 6.25 km of Merotherie Road to the hub. A Traffic Management Strategy will be implemented. • The Operation Plan is in draft and will consider resident access to site facilities like the gym. • Initially, potable water will be used on site, followed by recycled grey water and sludge from black water.
------------------------------------	---

I cannot find where the above agenda item was discussed in the following meeting – is the water supply for the workforce accommodation camps a secret? It has not been discussed with the community or local landowners.

The examples of erosion being caused during construction for large scale wind and solar installations are distressing to say the least. There are huge issues with baring such large swathes of land and making them vulnerable to erosion; some areas that have been managed for salinity for decades. One can only assume erosion will be an issue with the transmission project as well given some of the country they have to disturb to construct towers and access routes – land contoured by the Soil Conservation Service following previous erosion issues, and areas where large amounts of water run during periods of heavy rain and flood events that, interestingly enough, do not show up on desktop modelling.

Property Values & Insurance

There is genuine concern amongst landowners regarding potential declines in property values. I have spoken to numerous landowners who have told me they will not even entertain buying a property with high voltage transmission lines already constructed or proposed. Unfortunately, this is yet another impact that will be realised, but not acknowledged until the damage is done.

From the CWO REZ Transmission project Response to Submissions:

Response

While submissions have raised concerns about perceived impacts on property values, transmission lines may have little impact on dynamic changes in house prices over time (Han & Elliott, 2013). Furthermore, anecdotal evidence in the region suggests that land that is proximate to the proposed transmission infrastructure with strong renewable energy resources has the potential to generate value significantly greater than their current value as agricultural land.

Whilst the above suggests property values will not decline I believe it highlights the loss of agricultural land, and the Government’s willingness for that to happen.

The Lawson Park Solar project is a 5mW solar installation that has been approved for construction in close proximity to the Dunedoo township.

Issue raised	Question	WSC Response
The potential impact on property values is not a relevant planning matter. In any case, there is no evidence to suggest that the proposal will result in the devaluation of any property.	<p>The impact of Lawson Park Solar on adjoining or district property values should be relevant to the planning assessment as it is another potential consequence of the projects’ approval and construction. If these issues are not thoroughly investigated by Council prior to approval and construction I believe Council would be legally liable for impacts realised following construction.</p> <p>7.1 What research did the planner, and other Warrumbungle Shire Council staff and/or councillors, do to come to the conclusion that “there is no evidence to suggest that the proposal will result in the devaluation of any property”?</p>	<p>7.1 The planner’s job is to assess a development application having regard to the details submitted by the applicant, relevant development standards, controls and guidelines and issues raised in submissions. Issues raised in submissions need to relate to planning matters relevant to the proposed development application. The potential impact of a development on property values is not a planning matter that requires specific research to determine whether a concern about impact on property values is valid or not.</p>

There are also real issues regarding insurance and the potential liability of project neighbouring landowners, or even those in the greater district, if they are proven to be at fault following a fire that damages project infrastructure.

2. Public liability insurance for renewable energy projects – Transcript page 5

The Hon. JOHN RUDDICK: I appreciate that. Thank you. I know it's a lot of concern, because sometimes these farmers think they're getting a lot of money but then they could lose about half of it. Another thing related to the REZ is the question of public liability insurance. Some of these farmers will find that right next door to them there will be, basically, an industrial site with up to a billion dollars or more of capital investment. If there's a farmer there and a fire starts on their farm, and it then damages these big projects, they are very, very worried about being liable for them. The typical farmer in New South Wales has a public liability insurance policy for about \$20 million, but a lot of them are saying, "We need a lot more public liability insurance than just \$20 million" because they might inadvertently damage a billion dollars.

Some insurance brokers that I've spoken to have stated that this challenge will likely not be resolved until the first case is determined through the courts as to who is actually liable. It would seem the most commonsense way to avoid this scenario is for the New South Wales Government to require any developer-operator of a renewable energy infrastructure project and/or associated infrastructure to indemnify any and all external risks if an incident, including a fire event, occurs that results in any public liability insurance claim. Do you have any views on this issue of how farmers could end up becoming bankrupt through a minor, inadvertent error which damages public property?

From CWO REZ CRG Meeting Minutes 31st October 2023:

- SE asked about liability for farmers. EnergyCo encourages landowners to speak to proponents regarding liability, but these conversations are not going anywhere. Farmers' own insurers have said insurance can be extended up to \$40 million, but some of the surrounding projects are worth more than that.
- CA advised that the NSW Government has recognised the issue of increased public liability insurance costs, as referenced in the response to the NSW Agriculture Commissioner's review into renewable energy and agriculture (outlined in previous meeting minutes).

Livestock Health & Meat Contamination

"Livestock Production Assurance is crucial for maintaining and growing Australia's \$74.5 billion red meat industry. It underpins Australia's biosecurity, food safety, animal welfare and traceability credentials. Without it, Australia would not be the dominant global red meat producer that it is. LPA continues to provide world-class assurance to domestic and international customers that Australian red meat is safe to eat, ethically produced and is of high quality."

While the LPA is a voluntary industry program the majority of Australian red meat processors require their livestock to come from an LPA-accredited property, and the accreditation gives you access to the National Vendor Declarations (NVDs), making it key to selling and transporting livestock.

The below is a question in the LPA Accreditation:

LPA Accreditation

Food safety on your property

Question: 2.8

Do livestock have access to leaking electrical transformers, capacitors, hydraulic equipment, solar panels, wind turbines, coal seam gas structures or coal mine wastes?

- ☐ Yes
- ☐ No
- ☐ I am now aware and making plans to restrict access.

< Back

Save and continue

Select your answer and then click 'Save and continue' to continue

What will the above mean for livestock producers that are being/have been forced to “host” transmission infrastructure, and those who are choosing to lease their land for solar panels and wind turbines? Will they be ineligible for accreditation and therefore unable to sell their livestock?

According to the Australian Government’s Department of Agriculture, Fisheries and Forestry website “An export slaughter interval (ESI) is the time period determined by the Australian Pesticides and Veterinary Medicines Authority (APVMA) that must elapse between an animal's last exposure to a chemical and its slaughter for export purposes. Such intervals are set to protect Australia's trade interests by ensuring that meat exports meet the residue standards of the destination markets. Intervals that are too short invite costly trade and reputational incidents; intervals that are too long place Australian exporters at a competitive disadvantage to their international counterparts. Many benefits are gained from agvet chemicals but with their use comes risks of undesirable residues. Such residues include the traces of a chemical or its breakdown into different components that remain in or on treated produce over time. To maintain the high quality of Australia’s meat produce, producers must ensure that residue limits are not exceeded when exporting meat products. This is done through the application of withholding periods (WHPs) and ESIs reflecting Australian or international maximum residue limits (MRLs).” Will running livestock in the vicinity of, and potentially even downstream of, renewable energy infrastructure potentially limit our access to livestock and markets?

There is anecdotal evidence of fertility issues in cattle since the operation of wind turbines in the Central West district. I believe there should be a range of studies carried out, prior to the construction of any further large scale renewable energy infrastructure to ensure there are no adverse impacts to livestock fertility, health or meat contamination so as not to cause further impacts to neighbouring and/or district farming operations.

Workforce & Accommodation

Another common concern throughout the CWO REZ has been the number and scale of workforce accommodation. Due to the number of projects, and their essentially individual planning process, there does not seem to have been any progression on the suggestion of a REZ wide accommodation strategy so as not to have accommodation facilities scattered all over the region. There are countless mentions (see below), some from as long as nearly two years ago yet projects are being advised by EnergyCo to continue planning for individual camps given it is a requirement of the planning process. Yet another strategy that should have been planned prior to any works commencing!

From CWO REZ CRG Meeting Minutes 27th April 2023:

Workers Camp strategy and Plan of Delivery: As with previous question regarding detail around cumulative impact findings and solutions, **could EnergyCo provide information regarding the Worker's Camp strategy for the Transmission Line project and the Plan of Delivery? And also clarify, how this Worker's Camp strategy has been evaluated from a REZ perspective on Workforce Accommodation?**

The transmission Network Operator is expected to require multiple temporary workforce camps to support construction of the REZ transmission network. While land has been purchased at Cassilis for potential use as a temporary work camp (subject to planning approval), we need to carry out further investigation work over the coming months to confirm the overall strategy for workforce accommodation and other proposed camp sites. The Environmental Impact Statement will provide a detailed assessment of proposed workforce accommodation camp sites for the transmission project. The EIS will be displayed for public exhibition in Q3 this year.

In terms of workforce accommodation across the REZ, EnergyCo is continuing to consult with Candidate Foundation Generators and the Department of Planning and Environment to investigate potential joint workforce accommodation solutions. There are a number of constraints being assessed including planning regulations, industrial relations, commercial risks and other issues. EnergyCo will provide a detailed update on temporary workforce accommodation at the July CRG meeting.

EnergyCo's Workforce Accommodation Flyer September 2023

Coordinating REZ workforce and accommodation

As Infrastructure Planner, EnergyCo is coordinating the delivery of transmission and generation projects in the REZ including planning key initiatives like housing and accommodation.

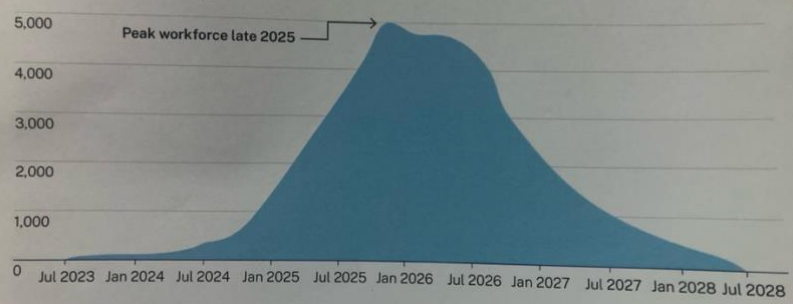
As well as coordinating the temporary workforce accommodation requirements for the REZ transmission project, EnergyCo is investigating housing and accommodation in the REZ more broadly in partnership with local councils, industry and other NSW Government agencies.

While renewable energy generators are responsible for addressing their own workforce accommodation requirements, EnergyCo is also working with developers to coordinate the delivery of workforce accommodation for wind and solar projects in the REZ.

EnergyCo is currently working with councils, developers, government agencies and industry to identify suitable locations for workforce accommodation to minimise impacts on the community. We are also working to establish suitable funding arrangements with industry to minimise the need for additional funding from the NSW Government.

EnergyCo is actively engaging with REZ stakeholders and facilitating information sharing and planning so that housing and accommodation outcomes are delivered in a coordinated manner.

Expected construction workforce numbers for the REZ transmission project and generators with proposed connections to the REZ network



From Budget Estimates 2023-2024, Portfolio Committee No. 7 – Planning and Environment, Answers to Questions on Notice, Hearing 7th March 2024:

39. Housing for workers in Central-West Orana Renewable Energy Zone – Transcript page 54

The Hon JOHN RUDDICK: My first question is to Mr James Hay, Chief Executive Officer, Energy Corporation NSW and the Department of Climate Change. I'm sure you'd agree, Mr Hay, that when a genuine new industry does come along and satisfies a human need, whether it's automobiles or mobile phones, we don't need the government to be involved and it works very efficiently. When politicians and bureaucrats try to engineer a new industry, it becomes very

inefficient and there is a lot of waste involved. I am told, and I am keen to hear if this is accurate, in the Central-West Orana Renewable Energy Zone that you're going to need approximately 12,500 workers. Most of them are going to be temporary jobs; there'll be a little bit of ongoing maintenance. But for two or three years, maybe four, you'll need about 12,500 workers. But I am told there has been no public collaboration between community, council, developers and EnergyCo to discuss a coordinated strategy for temporary worker accommodation. Does that sound accurate?

JAMES HAY: I will have to check the number of the workers, so we'll come back to you on that. We have a steering committee established with the councils in Central-West Orana Renewable Energy Zone and one of the project tasks around that is a strategy around accommodation for temporary workers, so that is actively being discussed across the agencies and with councils.

Answer:

EnergyCo's forecast in the Central-West Orana Renewable Energy Zone (REZ) is a peak of up to 5000 workers if all the projects (transmission line, related infrastructure and solar and wind projects intending to connect to that line) progress based on their anticipated timing. This can be viewed at www.energyco.nsw.gov.au/sites/default/files/2023-03/cwo-rez-report-research-impacts-benefits.pdf.

In response to the incoming workforce, in July 2023 EnergyCo established a Central-West Orana REZ steering committee to identify community benefit opportunities and strategies to coordinate REZ-wide impacts. The committee includes project working groups across five priority areas including training and skills, roads and transport, economic development and participation, environmental delivery and housing and accommodation.

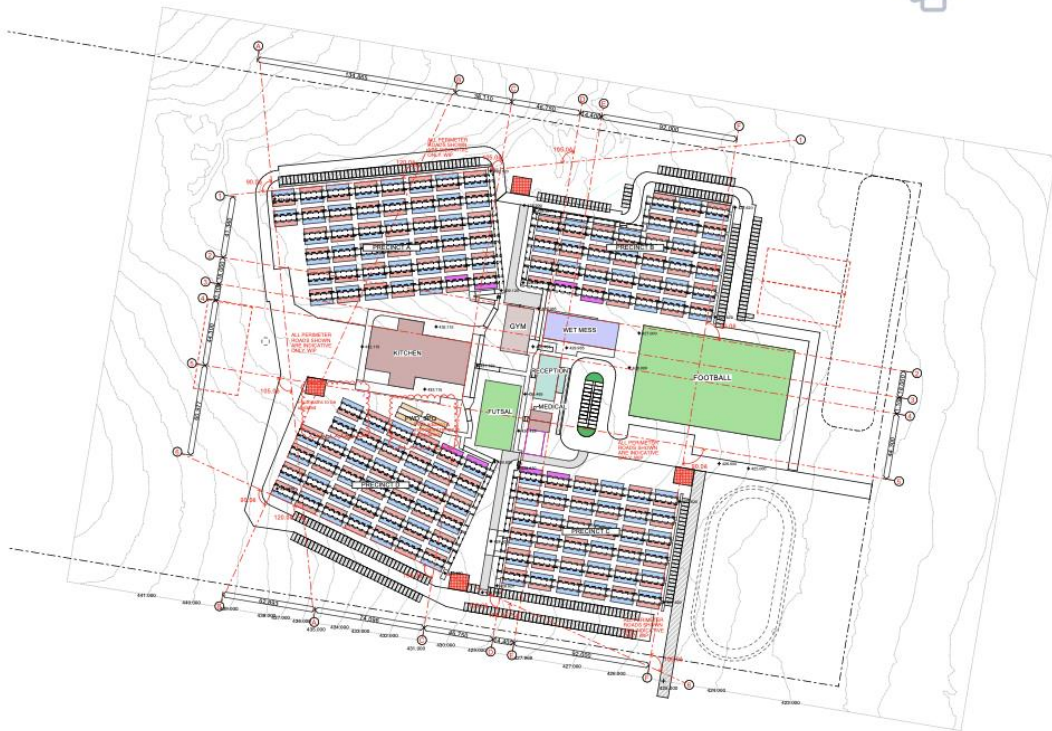
The housing and accommodation project group is chaired by the Department of Planning, Housing and Industry with members from Dubbo Regional Council, Mid-Western Regional Council and Warrumbungle Shire Council, the Department of Regional NSW, NSW Health, NSW Treasury and EnergyCo. Its main focus is to investigate and develop an approach on how to accommodate workers in the REZ. The group prepared a draft action plan to support outcomes for housing in the REZ including for workforce accommodation. The draft plan is now with the steering committee for consideration.

In line with Recommendation 2 of the NSW Electricity Supply and Reliability Check Up the NSW Government has established a Whole-of-Government Steering Committee, which is responsible for coordinating a whole-of-REZ strategy across priority areas. During the development of the Whole-of-Government Steering Committee, the Central-West Orana REZ steering committee housing and accommodation draft action plan was also provided to help inform development of actions to support outcomes for housing in the REZ including for workforce accommodation.

I wonder if we are any closer to some real whole of REZ strategies (not just paper promises) that will assist REZ impacted communities in dealing with what is already rolling out in the regions. Some would say the cart has been put before the horse!

From EnergyCo/ACERREZ Industry Forum Presentation:

Merotherie Village Project



To the astonishment of the local community members present at the ACERREZ/EnergyCo Industry Forum the above was displayed as the design for the main energy hub workers accommodation. We found out that workers would have more facilities than the towns of Dunedoo or Coolah.

That was when it was also made clear that the provisions for firefighting at the camp would be access to water and a storz fitting for FRNSW or RFS to protect the camp.

Telecommunications & Connectivity

Connectivity is a major issue in rural and regional NSW; service and data speeds have declined since the disconnection of the 3G network. Our services are regularly interrupted whether it be by network congestion or tower outages. Businesses now rely on technology for agricultural machinery, banking, invoicing – both outgoing and incoming, contact during an emergency amongst other things. Further congestion to our network through the insertion of an extra five thousand strong REZ related workforce will seriously impact our connectivity and could mean the loss of income, productivity and potentially even the loss of lives.

Response from Ash Albury 8th March 2024

13 The report also states that "EnergyCo has continued to investigate telecommunications upgrades in the REZ". Could you please provide an update on these investigations?

In 2023, EnergyCo entered into a Memorandum of Understanding (MoU) with the NSW Telco Authority to investigate opportunities for telecommunications uplift in REZ communities.

This work investigates opportunities to use energy infrastructure being developed as part of the REZ to improve telecommunications capacity, and opportunities to create new standalone telecommunications improvements as a community benefit (for example, new mobile phone towers).

In past and recent consultation, we have heard this remains a key priority for local communities as a potential benefit to be delivered in the REZ. More information will be shared once we have tangible options to discuss with local communities.

Again, it is acknowledged above that EnergyCo is aware of such issues yet there has been no work completed on the ground to remedy the situation.

Feedback received following a complaint to Telstra in mid 2024:

Dear Emma,

Complaint Reference: [REDACTED]

Thank you for getting in touch with us on 8 July 2024 about a complaint relating to your Telstra account [REDACTED]

I'm sorry we haven't been able to reach an agreement by offering the following:

- Congestion is detected affecting one or more primary serving cells at the specified address. Performance impacts may be experienced. Some congestion is detected on one or more cells the specified mobile service frequently accesses. Performance impacts may be experienced
- No tower upgrades are planned or have been recently completed at this address
- Advised that cases like this concerning a network congestion, only a tower upgrade can help with the network performance, however unfortunately, we are unable to provide a timeframe as to when this will commence
- Advised of external options, but you mentioned that the area is serviceable only by Telstra
- Offered to have fixed service to keep up with their means of communication, but you declined
- Set expectations that since we are unable to provide a timeframe for a tower upgrade, you can decide whether or not you will keep her service with Telstra. In line with that, as once off adjustment we can offer a 6-month plan adjustment to her account amounting to [REDACTED] This is the last adjustment that we can offer, moving forward, You will be held liable for your monthly costs
- Given that we are unable to provide a timeframe for a tower upgrade, advised that we will close case as unresolved.

You have told me that this doesn't meet your expectations as you are still encountering concerns with the mobile service.

While it's disappointing that we were unable to resolve your complaint, we are confident that our investigation and proposed resolution are appropriate. As a result, I've recorded these details and closed the case.

You may wish to discuss our resolution offer with the Telecommunications Industry Ombudsman (TIO), however if at any stage you decide to accept, please call me on 1800 241 787 quoting your complaint case number [REDACTED]

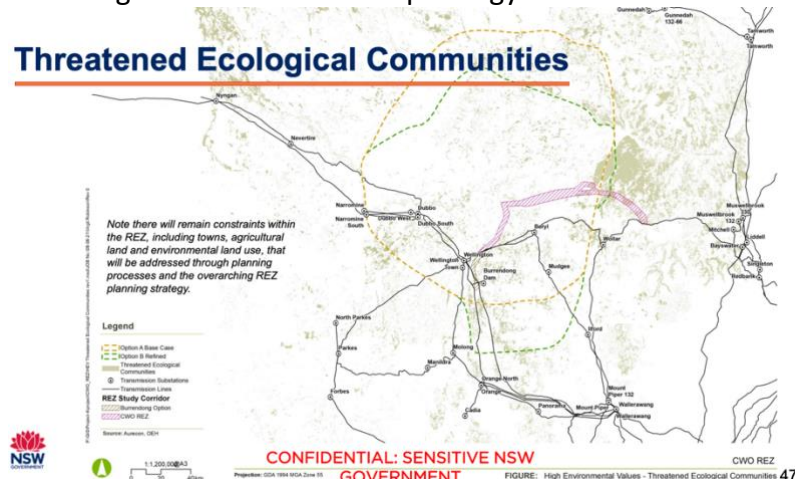
During a conversation about the main workers camp for the transmission project, the lack of telephone service and data speeds currently being experienced in the region arose. I believe it was an EnergyCo or ACEREC representative that stated they were looking into options for the workers camp such as a truck mounted Starlink unit. The response from community was, as you would expect, one of astonishment – all they were worried about was the workforce being catered for, no concern for the community impacted by their imposition on the area.

Biodiversity

The “rapid transition to renewable energy” has the potential to decimate New South Wales, and Australia’s biodiversity, all in the name of saving the environment.

CWO Regional Reference Group EnergyCo PowerPoint Presentation June 2021:

Threatened Ecological Communities



While this is an early iteration of the CWO REZ transmission project study corridor I thought it was interesting to note the large amount of threatened ecological communities on the map. I can only assume if you zoomed in it would seem like more in a smaller area.



Biodiversity offsets

We are balancing energy development with strategic conservation by securing Biodiversity Stewardship Agreements (BSA) across the community, protecting crucial ecosystems like Box-Gum Woodland and threatened habitats such as the Regent Honeyeater.

Two large properties adjoining Capertee and Goulburn River national parks have been acquired, boosting conservation and ecological connectivity in the region.

We're building long-term land stewardship and promoting regional sustainability by collaborating with landholders and stakeholders.

Below is a photo of Merotherie Road. Just prior to Christmas local landowners were informed by chance that ACEREZ were planning on clearing the majority of the vegetation through this road corridor to make way for OSOM loads and heavy vehicles despite the Mid Western Regional Council having declared the area High Value Biodiversity decades ago.



It is no secret that I am not on board with the Biodiversity Offsets Scheme. Making it acceptable to destroy one ecological community by locking up another, often in a completely separate area, to become a harbour for noxious weeds and feral animals should not be permissible.

Is it assumed that the flora and fauna will magically reappear in these area's one of which is over 150kms away from the main energy hub?

Below is a photo of Birriwa Bus Route South. While not part of the CWO REZ transmission project, local landowners are concerned ACEN, who will construct Birriwa Solar, are proposing to upgrade this road to access their accommodation camp. The assumption is the majority of vegetation will be removed to allow for this.



As a local landowner I would not be granted permission to remove such important areas of biodiversity, but it seems as long as a project is in the name of the “public interest” whatever damage is deemed necessary will be approved. Can large scale renewable energy infrastructure really be considered environmentally friendly?

Noise Impacts

The majority of noise impacts during the construction of large scale renewable energy infrastructure projects are said to adhere to regulations and/or be temporary negating the need for any mitigation measures. What is not mentioned is that the noise impacts will essentially turn our quiet, scenic, rural area into an industrial zone – stealing our peace and tranquillity.

Noise during the operation of solar, wind, transmission and BESS projects also “complies” with guidelines and is still often classified as temporary – even though these projects are expected to have a life of between twenty and fifty years.

Does it matter that this noise, and in some cases vibration, is driving rural people, particularly farmers, from their homes? Or is that acceptable because it is only a small percentage of the population and the energy transition is in the “public interest”?

Visual Amenity

As a rural Australian, and farmer, I have found that if you raise visual impacts as a negative aspect of transmission lines, wind turbines or large scale solar installations you are labelled a NIMBY – not in my

backyard. What is failed to be adequately contemplated, despite DPHI and renewable energy proponents suggesting this large infrastructure fits in with normal farm infrastructure, is that often we have spent our lives admiring the landscape we live and breathe. Some of us are fortunate enough to live with the most spectacular views, not just from our homes but our entire properties – another thing that the relevant guidelines fail to acknowledge – as farmers we spend a large amount of time in the paddock, not just in our homes, should visual impact not be considered from our whole property not just the house?

The below highlights the size of the proposed turbines as compared to the Dunedoo silo – some are now 280m high:



A video presentation illustrating the impacts of EnergyCo and ACERZ proposed new 330Kv Transmission Line through the property Wirroolga, 6km from Cassilis NSW. The Transmission Line will be 60m tall and requires a 70m wide permanent easement acquisition area.
<https://www.youtube.com/watch?v=sbwbK0SbBMA>

This is my neighbours new home, and while I don't begrudge the installation of solar panels on the roof, in fact I welcome it, the glint and glare from the small number of panels is astonishing (photo taken from approx. 1.7km away). Just imagine overlooking over a thousand hectares of panels...



Vegetation screening is often offered as a mitigation measure for a projects visual impacts on a neighbouring home; I am yet to see it used for the remainder of a property. I have regularly questioned the efficacy of such a measure given the time it takes for trees to mature, the terrain (how do you screen when your home is situated above infrastructure), maintenance of vegetation, potential creation of fire risk and the loss of the view from your home.

Cumulative Impacts

Cumulative impacts may be the most dangerous of all of the potential issues that will face rural and regional NSW and Australia with regard to the rollout of large scale renewable energy infrastructure projects, and the least considered. Each project proponent is most concerned about the issues they will have to mitigate, not considering adequately the cumulative impacts of all of the proposed projects. The cumulative impact assessment carried out for each EIS is yet another box ticking exercise often making calculations that are “less than one percent” or not considering that projects more than thirty kilometres away from the one they are proposing contribute to cumulative impacts of any description.

Cumulative impacts are yet another issue EnergyCo has been acutely aware of for years, in fact longer than most other impacts, but their ability to rollout any successful mitigation measures has been hampered by an ineffective consultation process and a seemingly incompetent project team.

From EnergyCo’s CWO REZ Project Update June 2022:

We are preparing a set of studies to coordinate the impacts of the REZ across a number of areas we’ve heard are priorities to the community:

Workforce accommodation

We are reviewing how we can provide construction workforce accommodation and services while meeting the needs of local communities and businesses.

Training

We are investigating opportunities to boost the skills of the local workforce and build capabilities in the renewable energy sector.

Roads and traffic management

We are looking at how we can coordinate traffic management and local road improvements within the REZ.

Telecommunication improvements

We are looking at ways to improve mobile connectivity for local communities as we deliver the REZ.

Waste management

We are investigating how we can best support local councils to manage waste during construction.

From EnergyCo’s CWO REZ Project Update September 2022:

In addition, EnergyCo is carrying out a range of studies which will inform how we coordinate impacts within the Central-West Orana REZ. We are seeking input from local councils, key stakeholders and subject matter experts to ensure the studies result in meaningful outcomes and recommendations. The findings will inform how we deliver workforce accommodation, road upgrades, workforce training, improved mobile connectivity and other key programs and initiatives. The studies are expected to be completed in late 2022 with the aim of coordinating project activities in the REZ to minimise cumulative impacts. We will notify the community once they are available to view.

Cost Blowout

According to the NSW Climate and Energy Action website “we’re upgrading and transforming our electricity network now to deliver more affordable, clean and reliable energy for everyone in NSW.” Considering the cost blowouts to date, evidenced below, will NSW residents see cheap or reliable energy?

According to the document ‘Rationale and basis for EnergyCo’s network recommendations’ published in May 2024: “Under the access fee structure for the Central-West Orana RNIP, the costs associated with hub to project network will be substantially recovered from access right holders. However, if there are residual costs, these will be recovered from NSW electricity consumers.”

From EnergyCo’s NSW Network Infrastructure Strategy May 2023:

Extra capacity (GW)	4.5	2.3	3.5
Anticipated delivery timing	2027/2028	2029–2038	2043
Construction cost preliminary estimate	\$3.2 billion	\$0.8 billion	\$1.3 billion

Estimates are Class 5b accuracy (i.e. +/- 50%) and for development and construction costs only (excluding finance, generator connection and system strength costs). This provides a comparable basis with estimates for projects under the National Electricity Rules. The total cost for a REZ also includes finance, generator connection and system strength costs at typically an additional 70% to 110% of development and construction costs. Generator and storage proponents that hold access rights will contribute connection and system strength costs. All values are in real 2021 Australian dollars.

Deliver Now network configuration is subject to review and refinement as part of detailed design review, Network Operator tender and the authorisation process.

From ‘Rationale and basis for EnergyCo’s network recommendations’ May 2024:
Costs of the Central-West Orana REZ

The National Electricity Rules-equivalent consumer-funded capital cost of the Central-West Orana REZ is expected be around \$5.45 billion (nominal value, adjusted for inflation) for recommendation and authorisation purposes as of February 2024. This falls within the range of cost estimates published in the NSW Government’s May 2023 Network Infrastructure Strategy.

This amount includes:

- The costs of the design and construction of the core network infrastructure for the Central-West Orana RNIP



- ACERREZ and upfront development costs
- Costs related to the development and delivery of the Central-West Orana REZ including property acquisition, biodiversity offsets, local community commitments and road upgrades
- Costs of works on Transgrid’s existing network to deliver the Enabling RNIP (Figure 2).

The capital cost amount above does not include:

- Costs that are to be borne by new renewable generation and storage projects relating to the development and delivery of the hub to project network and the centralised system strength solution.
- Financing costs during construction.
- Contingency amounts for the above costs.

The final cost of the Central-West Orana REZ, determined by the Australian Energy Regulator (AER)³, will include these costs.

The final cost figure is subject to adjustment pending contract finalisation matters ahead of financial close, including outcomes of access allocation process for generator contributions, changes in foreign exchange and commodity prices, and the outcomes of the AER revenue determination.

Response from Ash Albury 8th March 2024:

6	Email to Mike Young (9 November 2023, continued) What is the estimated value of land and easement purchases/compulsory acquisitions for the project?	This information is commercial in confidence.
7	Email to Mike Young (9 November 2023, continued)	If the project does not proceed following the acquisition of easements, there is no obligation for the landowner to repay compensation previously received.
17	<i>What funds have been spent on the CWO REZ to date?</i>	Some cost information confidential is commercially sensitive. If disclosed, this information would have the potential to negatively impact future competitive assessment processes for similar energy infrastructure projects. Project development and procurement also requires some cost information to be kept confidential to ensure government can maintain healthy competitive tension between project tenders, maintain a strong negotiating position and continue to secure the best deals for consumers.

Large Scale Renewable Energy Project Submissions

Within the CWO REZ there are over fifty large scale renewable energy infrastructure projects operating, under construction and in various stages of planning. Beyond that, throughout the rest of NSW I cannot imagine the tally; and interestingly enough I don't believe any Government authority has done the sums and made the information publicly available.

You will find my issues remain largely the same for each of the proposed projects that I have objected to so please excuse the repetition.

Bellambi Heights Battery Energy Storage System

Bellambi Heights Battery Energy Storage System	SUB-62147475	10/09/2023	No	Object
Attachments				
Comment / Message				
<p>I object to this project. The cumulative impact of all the wind and solar developments and transmission line projects in the CWO REZ is ridiculous. The Central West is a well known food and fibre producing area that should be left that way.</p> <p>Power should be generated where it is to be used. Why are there not solar panels on every roof space in major cities?</p> <p>The construction period for all of these proposed developments will kill our region and leave our pristine vistas ruined.</p> <p>We also live in a bushfire prone area, how will ground firefighting be carried out amongst solar panels and aerial firefighting be utilised amongst wind turbines.</p> <p>None of the REZ's have been properly thought through and should be abandoned until due diligence is done!</p>				

Birriwa Solar

Birriwa Solar Farm	SUB-49966958	01/11/2022	No	Object
Attachments				
Comment / Message				
<p>I am a landholder east of Dunedoo on the Golden Highway. I object to the proposed Birriwa Solar Farm for a few main reasons. Firstly, power should be generated where it's being used. Why does our landscape need to be polluted by solar panels and power lines when we don't get to use any of the produced power? Not to mention the huge loss of generated power by the time it reaches its destination; what a waste!!</p> <p>Secondly, the solar farms are terrible to look at and can be seen from a very long way away. They are certainly not the view I want to see every day so I feel for those who are closely impacted by their view!</p> <p>And lastly, how would fire fighting be carried out once the solar farm and power lines are installed? The Sir Ivan Fire wasn't that many years ago and was fought with the assistance of planes and helicopters. I can't imagine the RFS will send aerial assistance with large power lines in the area.</p> <p>I'm not sure who came up with the whole Renewable Energy Zone but I assume it was someone sitting in an office somewhere who has never set foot in the Central West! Interrupting prime agricultural land will have a long lasting and devastating effect on Australia's ability to feed itself. Not to mention the stress it places on small communities who rely on the whole population to stay viable; this is the sort of stuff that tears families and communities apart.</p>				

OBJECTION to Birriwa Solar Farm Amendment (SSD-29508870) (submitted via Major Projects Portal – 19th October 2023)

I am a farmer and landholder in the Dunedoo district, and I hold grave concerns for the future of farming in this area given the proposed solar, wind and transmission line projects.

Not unlike the original EIS report for the Birriwa Solar project there are a lot of vague statements noting the need for detailed design or further refinement. How can the impacted community be expected to make our final comments on design with so many unknowns?

The impact another proposed accommodation camp, nearly the size of Dunedoo, will have on the surrounding landholders will be immense. The proposed Merotherie main camp site for the CWO REZ Transmission project is not more than 3.5km from the proposed ACEN workers' camp. The cumulative effects are too much!

The EIS states the workers camp would use 125,000L of water per day which will be trucked in if a local water source is not located. Water in our district is a highly valued commodity, especially when we are facing another El Nino, and stock and domestic use has priority. To have to truck water from Windemere Dam only means more heavy vehicles on the road!

The solution for sewerage and general waste is sketchy at best. Our local councils have enough difficulty providing these services to the general population let alone covering the ACEN workers camp requirements.

It is said that shuttle buses will transport workers from the camp to the construction site daily but there is no mention of how the workers will get to and from the camp when their allocated work days start and end?

Emergency services in rural Australia are stretched. Doctors and nurses are hard to find and keep in country areas. It is suggested that the camp will have a medical centre with an onsite nurse but I assume in an emergency the local ambulance service will be called and the patient will be transported to a local Emergency Department (possibly Mudgee or Dubbo). There are already large wait times to see a doctor either at their surgery or in the ED.

Most of the towns in this area are manned by one police officer, who is often in charge of more than one town each shift. There is provision for security guards for the workers camp but if there is an incident where the police are needed, they may be at least an hour away, and leave our towns unmanned.

The soil at the proposed site of the accommodation facility is “low capability, low fertility”, but “highly sensitive to disturbance”. I believe any interference to this land should therefore be avoided. If there are problems with erosion that does not only impact the primary site but has the potential to cause major issues downstream.

The bushfire assessment requires a 50,000L static water source (tank), storz outlets and fire hydrants for firefighting use at the camp. Where would the water come from for the fire hydrants? Does ACEN expect the closest Fire & Rescue and Rural Fire Service units to defend the village if there was a fire emergency? Considering towns the size of Coolah and Dunedoo have their own Fire & Rescue Units and those with smaller populations are protected by RFS should ACEN not have to provide full time protection from fire? Both of these organisations are staffed by local business owners and employees who take time out of their lives to serve their communities.

The impact of the 25-30 staff required to build the accommodation camp would be sizeable. There is not a lot of short term accommodation available in the local area, and to block that out for 3-7 months will hurt the regions tourism industry. Not to mention the extra 180 semi trailer loads to establish the facility and what that will do to the local road network.

The proposed workers camp will impact 3.25ha of Superb Parrot habitat. On top of the direct impact on 8.62ha of Koala habitat and 0.48ha of foraging habitat for the Large-eared Pied Bat throughout the rest of the project. Surely impacts on the environment such as these cannot just be “offset”, especially in areas outside the project area.

A project of this size, with so many potential impacts, should not be permitted to rely on desktop studies; it is too important to the local community!

Sincerely,

Emma Bowman

Birriwa Solar IPC submission (submitted to IPCn via email with specified attachments- 14th June 2024)

The Birriwa Solar project has the potential to have enormous impacts on the local community and region due to a plethora of possible unintended consequences of turning rural agricultural land into an industrial area.

Central West Orana Renewable Energy Zone

ACEN Australia’s Birriwa Solar project is one of over fifty projects operating, under construction and proposed within the CWO REZ boundary at this point; it is certain there are more projects early in the planning stages and developers continue to prospect for more potential land hosts. The CWO REZ declaration came as a shock to the vast majority of its inhabitants. Not unlike specific projects being proposed by developers now, community engagement regarding the REZ was lacklustre, or even non-existent. Below are answers given to supplementary questions at the 2024 Budget Estimates hearings in

the NSW Parliament evidencing the lack of community knowledge about the CWO REZ prior to its declaration.

(a)	In accordance with the Minister's statutory obligations under section 20(e) of the <i>Electricity Infrastructure Investment Act 2020</i> , the Central-West Orana Renewable Energy Zone (REZ) draft declaration was exhibited on the former Department of Planning, Industry and Environment's website for public consultation for 28 days from 17 September 2021 to 15 October 2021.
(b)	Six submissions were received from stakeholders during the draft consultation period. All submissions were in support of the exhibited draft (three from renewable energy developers, two from public authorities, and one from an organisation). No submissions were received from members of the general public, and no objections were received from any stakeholders.
(c)	Submissions were provided on the grounds that they would be confidential. Submissions will not be published.
(d)	Consistent with the Minister for Energy's statutory obligations under section 19(4)(b)(iii) of the <i>Electricity Infrastructure Investment Act 2020</i> , the declaration was made in consideration of the views of the local community in the REZ. This included through landowner meetings, direct engagement with local councils, mailouts, and establishment of a Central-West Orana REZ Regional Reference Group with local community representatives. The proposed scale and scope of the Central-West Orana REZ identified in the declaration had been publicly available since the NSW Government's submission on AEMO's Integrated System Plan in March 2018.
(e)	The former Department of Planning, Industry and Environment advised the Minister at the time that the declaration could be made consistent with statutory obligations under the <i>Electricity Infrastructure Investment Act 2020</i> , including that views of the local community in the REZ had been considered and that the draft had been published for 28 days on the Department's website.

Social license

It is important to note that over the course of two exhibition periods, the main EIS and amendment, there was not one submission in support of the Birriwa Solar project, but there were 130 objections. There was also not one community member willing to speak in favour of the project at the IPC meeting held in Dunedoo.

ACEN Australia employees were very quick to claim commercial confidence when asked how many agreements have been made with neighbouring landowners – does that suggest there are no agreements in place? I believe it is important the commissioners have this information made available to them to better understand the sentiment in the immediate vicinity of the project (no details need to be made known; just the number of neighbours prepared to sign an agreement with the proponent). The below is an excerpt from the EnergyCo September 2022 project update. It states that an initiative under development by EnergyCo across the REZ's is "draft guidelines on orders prohibiting connection to the REZ network where community support has not been established". ACEN Australia's Birriwa Solar does not have community support so will it be permitted to connect to the REZ network?

Working with the community

EnergyCo is proactively investigating how we can manage cumulative impacts during the construction and operation of the REZ, as well as provide lasting benefits to the local communities which will host renewable energy infrastructure.

Initiatives under development by EnergyCo across the REZs include:

- NSW transmission guidelines which would provide a robust framework for the planning and development of new transmission infrastructure and provide certainty for landowners, communities and project proponents
- Draft guidelines on orders prohibiting connection to the REZ network where community support hasn't been established
- A regional energy strategy outlining community energy schemes and other initiatives
- Guidelines to ensure First Nations people are engaged and benefit from the REZ
- Opportunities to bring forward the delivery of community benefit sharing initiatives in advance of access fees being collected from generators.

In addition, EnergyCo is carrying out a range of studies which will inform how we coordinate impacts within the Central-West Orana REZ. We are seeking input from local councils, key stakeholders and subject matter experts to ensure the studies result in meaningful outcomes and recommendations. The findings will inform how we deliver workforce accommodation, road upgrades, workforce training, improved mobile connectivity and other key programs and initiatives. The studies are expected to be completed in late 2022 with the aim of coordinating project activities in the REZ to minimise cumulative impacts. We will notify the community once they are available to view.

The rollout of the “rapid transition to renewable energy” has brought the term “social license” in vogue; unfortunately, it seems to be a trendy phrase with no authentic meaning nor does it have any genuine gravity. Should a project be granted consent if the majority of the community affected does not support it, in fact, objects to it?

Agriculture

Whilst the Department clearly states that “the project would not significantly reduce the overall agricultural productivity of the region and the site could be returned to agricultural uses in the future”, I believe there is evidence projects such as Birriwa Solar are already having detrimental impacts on the surrounding regions agricultural capacity. Personally, I have spent over 1500 hours reading associated documents, researching projects, writing submissions, lobbying politicians, and educating myself and others on the potential impacts of renewable energy infrastructure projects. My partner and I, with the help of my retired but still very active parents, run a 2500 acre sheep, cattle and cropping enterprise; this is a full time job, often seven days a week. One thousand five hundred hours is equivalent to 187 eight hour days, which is more than half a year. In practise this means late boosters for animal health (and sometimes deaths as a result), livestock missing out on feed (losing weight gains and therefore money at markets), sheep and cattle not being checked as often (lack of early intervention for fly strike and worm burdens), fences not being repaired or replaced, ill prepared cropping paddocks, falling behind in accounting bookwork and livestock recording and generally making poor decisions due to stress and exhaustion. This will only be exacerbated the longer the district faces the pressure and uncertainty of the “rapid transition to renewable energy” and its associated infrastructure proposals. The Department acknowledges that transforming land from its traditional use of agriculture to the industrial nature of a solar installation is a “loss” of agricultural land. However, the Department considers the amount of land lost to solar in the CWO REZ will result in a “negligible reduction in the overall productivity of the region.” Whilst there is 2 million hectares of land within the CWO REZ boundary and the loss of nearly 16,000ha to solar projects accounts for approximately 1% of agricultural land, when you condense the area to a 30km radius of Birriwa (where there are many projects currently proposed, under construction and operating) the loss of agricultural productivity is much more intense.

30km radius of Birriwa = 282,700 hectares (including non agricultural land)

Land lost to solar within 30km radius of Birriwa = nearly 11,000ha

11,000ha out of 282,700ha = 3.9%

The Central West Slopes and Plains is one of the most successful and productive regions in the state of NSW. To lose such a vast amount of valuable agricultural land will have major flow on effects to the rural towns and regional centres closest to the cluster of land being converted to infrastructure installations (the current calculations are only for projects far enough along in the planning process – not those still being prospected). Current primary production enterprises are running at capacity just to make ends meet due to increases in input costs and decreases in output revenue. I do not believe the land that will be left producing crops and livestock can cover the potential loss of land to solar projects and will threaten Australian farmers' ability to continue feeding our population and the economic benefits agriculture provides to the country through exports. These calculations do not cater for the loss of land due to wind installations or transmission lines.

Attached documents:

1. The Department of Primary Industries Agriculture Industry Snapshot for Planning August 2020

Impacts on businesses that rely on agriculture

The vast majority of rural businesses rely heavily on the agricultural industry for income - from farm merchandise businesses, stock and station agents, veterinary clinics, mechanics and steel supplies to the local supermarket, gift shop, bakery and cafes. The loss of families and agricultural businesses from the affected area will have enormous negative flow on effects on rural and regional towns.

Bushfire risk

The Department notes that "the site is not located on bushfire prone land" and that it "considers that the bushfire risks can be suitably controlled through the implementation of standard fire management procedures and recommendations made by FRNSW and RFS". There are huge parcels of land mapped "bushfire prone" that have not been subject to a large bushfire in the last century so I do not believe that is a reason to suggest bushfire risk is not high. I also wonder what the Department considers "suitably controlled" in regard to bushfire risk? Is there an acceptable number of fires or amount of land for a fire to burn before bushfire risk is too high?

The Birriwa Solar Main Submissions Report states "the bushfire assessment determined the risk of bushfire on the project to be low through the implementation of recommended mitigation measures" and "it is noted the lack of fire activity directly on the development footprint and surrounds is as a result of agricultural management and that the project site itself is not a noted bushfire path". Depending on the season, and therefore fuel load, any land could be classified "bushfire prone" and therefore at high risk of bushfire/grassfire. The 1979 fire burnt on the project area and the Sir Ivan fire burnt within 7km. ACEN Australia suggesting that Sir Ivan was not an issue as "the area affected by the fire is not located within the study area and is greater than 5km away" shows a lack of understanding of bushfires, their severity and impact to the affected communities. Sir Ivan burnt over 55,000ha within three days, spanning approximately 50km. The Birriwa Solar project was spared simply because of fire fighting efforts and the wind direction on the day; a wind change is all it would have taken to burn the whole study area!

Following fires like the 1979 Birriwa fire and Sir Ivan there are thousands of injured livestock to be euthanised and buried or treated, uninjured livestock moved to areas with fodder or hand fed, fences and other farm infrastructure to be repaired and replaced and in the worst cases houses and necessary items to be found for those who have lost their homes. This major clean up effort is undertaken by family and community members, neighbours and friends, not RFS or FRNSW bureaucrats, DPHI or DCCEEW employees or IPC commissioners or staff. The fact that the consequences of any out of control fire impacts those in the local community is reason enough for local people to have enormous impact on the mitigation measures needed to protect their district. Local RFS volunteers and control centres and FRNSW members should be consulted.

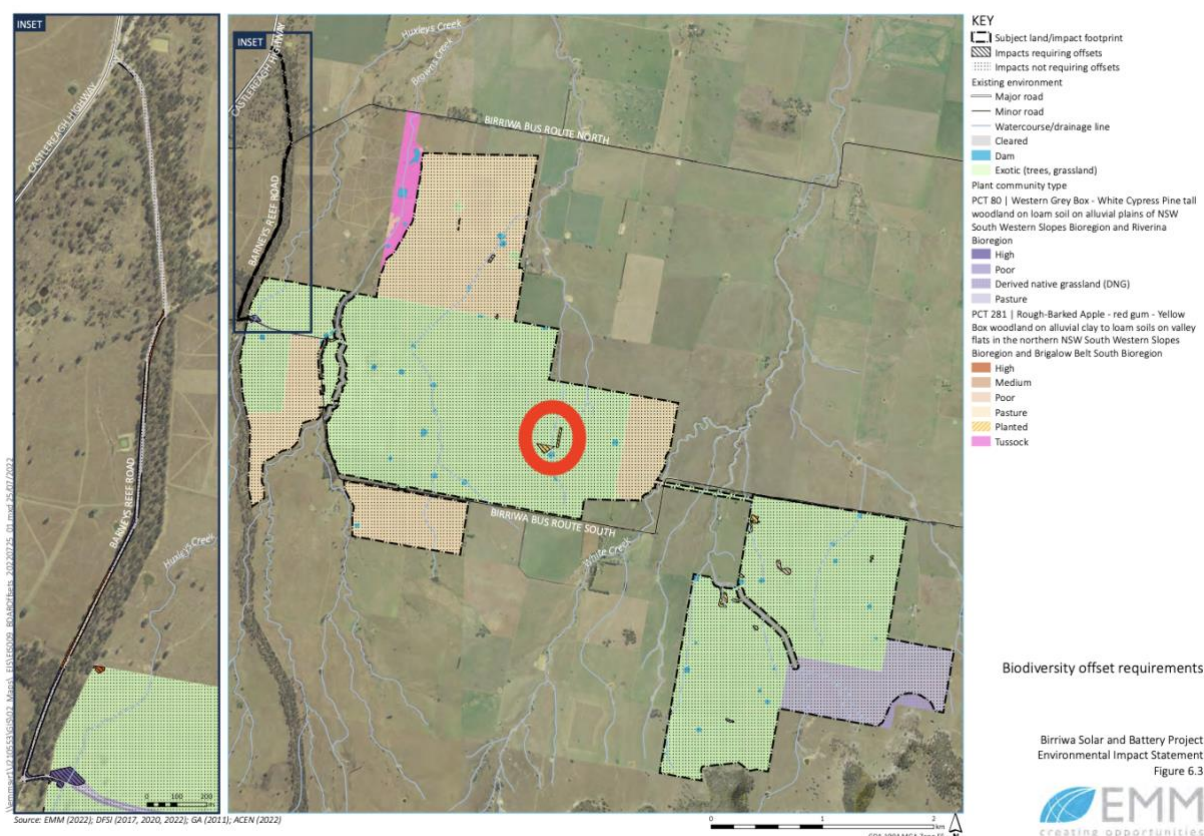
With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of expelling 280L/minute meaning 50,000L of water would be used in under 3 hours. During most grass or bushfires there are numerous fire fighting trucks and trailers, often owned by private

landowners used in an attempt to extinguish the fire in a timely manner for the obvious reasons of there being less damage caused. An average call out for RFS members and local landowners would see at least half a dozen vehicles/trucks attend – six 38mm nozzles would use 50,000L in under 30 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 50,000L is not enough water to adequately fight even the smallest of fires in rural NSW, and certainly not enough water to adequately protect a construction site or operational solar factory, 500 workers and an accommodation camp. RFS and FRNSW are already lacking resources to protect the current population in the district; I do not believe these agencies should be responsible for protecting any renewable energy development site, under construction or operating, or accommodation camp.

Environmental impacts

The Biodiversity Offset Scheme allows the devastation of habitat providing existing ecosystems are protected to equalize the destruction. It is my belief that mature trees should have to be replaced by other mature trees ie. prior to destroying one hectare of mature trees there should be one hectare of trees planted, and let mature to the same state as those being removed, not locking trees up that are already contributing to ecosystems.

My parents owned part of what is now proposed to be the Birriwa Solar project site during the 1990's. We planted trees on the block (seen on the below map circled in red) as shade and shelter for livestock and to help with salinity. According to ACEN Australia following the IPC meeting those trees will be destroyed to make way for solar panels. Is removing 30 year old trees environmentally friendly, or "green"?



Water sources

It is my understanding that the WAL's identified for use by ACEN Australia during construction of the Birriwa Solar project have not been secured by agreement with the owner of the licenses. Water is a finite and extremely important resource for agricultural districts. There are many stock and domestic bores within the Dunedoo and greater district, without which only a small number of primary producers would survive. There have been dry times when bores drop significantly or even dry up further up the

valley due to lack of refilling rain. Dunedoo also relies on bore water for the town supply so the overuse of water sources could be devastating for this area.

Soil, erosion and sediment

The location of the proposed accommodation facility is, on in person inspection, obviously prone to erosion. It is my belief that any proposed construction works, and therefore disturbance, will cause irreversible damage to the area regardless of any mitigation measures.

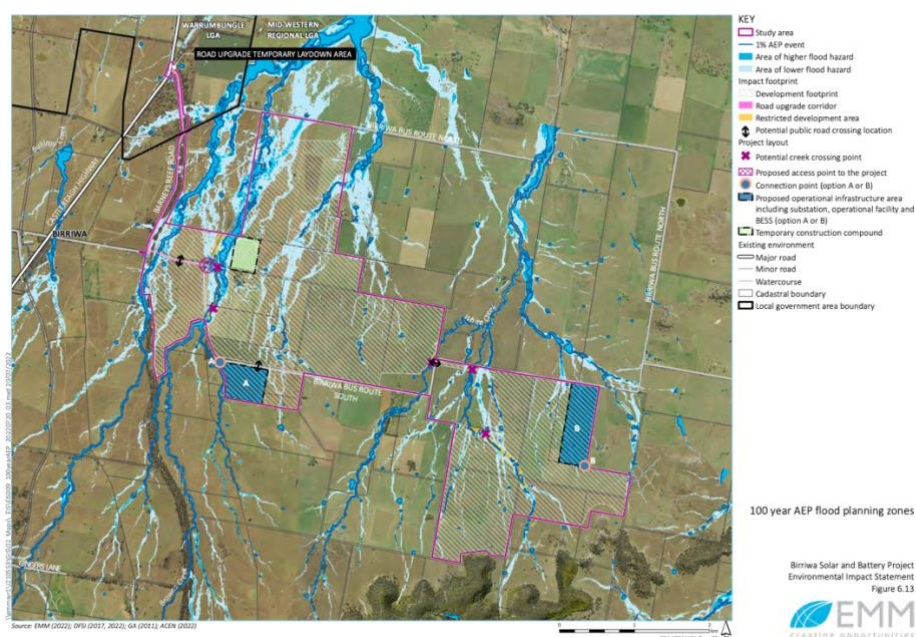
The project area has been assessed by the Department as having a high soil erosion hazard due to the dispersive soil. Landowners have worked hard for decades to control erosion and minimise sediment movement by constructing contour banks (in some cases in consultation with the NSW Soil Conservation Service) and moving to minimum till farming techniques amongst other things. The potential impacts to the area will be devastating when considering dams being filled in and contour banks being flattened to level the site for installation of solar panels. Landowners already neighbouring solar installations speak of their dams and contour banks being filled with sediment from the project sites due to erosion during construction.

The majority of the proposed project site is located on land where you would “bog a duck” during wet periods. ACEN Australia will have to create large laydown areas for parking and roads for heavy vehicles to make their way around the site if construction coincides with an above average rainfall period. There will be compaction from heavy vehicle movements so I am concerned how the site will be remediated following construction.

Surface water and runoff

There is the potential for major changes to the flow of water on and around the project site due to disturbance of land during construction, and increased run off and velocity due to the non porous surface of solar panels post construction. All of this water will traverse through one landowners' property (see map below) before making its way into the Talbragar River, and heading west to the Macquarie River. During large rain events a huge amount of water already runs through these creeks and watercourses; what will be the impact on runoff when the water is sheeting off solar panels rather than being able to soak into the whole soil area? Will the removal of current contour banks change the flow of water and create new drainage lines through neighbouring properties, and possibly even the Talbragar River? Will farmers be able to access their homes and properties during wet periods?

I believe the commissioners should make the effort to speak to landowners who have had experience with having a solar project installed adjacent to their property. There are stories of previously all weather access roads being cut, a woolshed being flooded and drainage lines being changed due to the redirection of water throughout construction.



Roads, transport and traffic

"The Department considers the project would not result in unacceptable impacts on the capacity, efficiency or safety of the road network." What is unacceptable? A school bus colliding with a heavy vehicle on what used to be a quiet local road? The cumulative impact of heavy vehicles and OSOM loads for the CWO REZ heading west on the Golden Highway from the Port of Newcastle impacting agricultural freight, both incoming and outgoing? Merriwa losing valuable parking space in the main street, near businesses that rely on through traffic for revenue? Landowners who walk stock across the transport route finding it impossible to find a gap or stop traffic to safely move their sheep and cattle to access feed and water?

Insurance impacts

Farmers and landowners around the country have long been raising concerns around possible insurance liability impacts for those forced to neighbour industrial renewable energy installations. Primary producers generally have a public liability insurance policy of \$20 million, some \$50 million. The projects some landowners are finding themselves neighbouring are worth hundreds of millions or billions of dollars. Farmers regularly face the risk of starting unintentional grass fires due to the machinery needed for farming operations (headers, slashers etc). Would a farmer who accidentally causes damage to project related infrastructure find themselves liable for all damages, and therefore potentially be forced to sell their property to pay damages?

Visual amenity and noise

"The Department considers the project would have a limited impact on the visual landscape of the region as a whole." My property is within 10km of the project site and has fantastic views of the whole district. Considering the project area is mostly 40m closer to sea level I believe we will view a large proportion of the project, and being located to the west will be subject to glint and glare from the project. There are numerous properties closer to the project area that will look over the majority of the installation. Our area prides itself on our rural landscapes and will be irreparably damaged by projects such as the proposed Birriwa Solar factory. "Concerns about visual impacts were raised in the majority of public submissions, including a number of residences in proximity to the site."

Social impacts

57 objections to the original project from within 100km of the project site – most submissions to the project typically focussed on local impacts and matter related to the local community. I believe that is proof of the concern for our district with regard to the proposed project.

"The site is located in a sparsely populated rural area. There are 22 non-associated residences within 2km of the development footprint." I would not consider the Dunedoo/Birriwa/Leadville district sparsely populated; maybe when compared to Dubbo, or Sydney. Broken Hill, Bourke or Ivanhoe are areas I would describe as sparsely populated. This, again, shows a lack of understanding of the district by DPHI and the proponent.

Rural communities rely on volunteers to keep the towns and district thriving. The majority of community events are run by committees made up of generous locals willing to give their time for the benefit of their local region. Whilst funding is helpful to kick start and continue running events it is the volunteers these functions can not do without. Renewable energy developers appear keen to splash funding around, in what can only be construed as an attempt to buy local support, but, as mentioned previously, they are not providing boots on the ground labour to enable any such events to continue.

Attached documents:

1. Mid Western Regional Council – Managing the Impacts of State Significant Developments
2. CWO REZ Mental Health Survey

Sheep grazing

"The Department notes that ACEN intends to continue grazing concurrently with the operation of the solar farm." Interestingly, ACEN states in the EIS there is "potential for ongoing agricultural practices, such as sheep grazing" – that is not a very strong commitment from the developer. ACEN also states in the EIS that "the project will allow for the land to still be utilised for some agricultural practice even where developed, by utilising sheep for grazing which is estimated to achieve 50% of existing stocking

rates for 50% of the year”. During the site inspection I noted there were large numbers of sheep and cattle grazing on the project site, a big proportion on crop. 50% of the number of stock, 50% of the year is a big loss for agriculture on that land.

Homes powered

ACEN Australia claims the Birriwa Solar project will power approximately 260,000 average households. That calculation allows 2.29kW per home – is that when the sun is shining, or 24 hours a day, 7 days a week?

New South Wales experiences 4-5 hours peak sun hours per day in summer and 3-4 in winter. According to the Australian Energy Regulator in 2023, the average energy used per day by a household with four people is about 21.355 kWh which is equal to 0.89kW. Peak hours of use are 6-8.30am and 5-9pm; all hours outside the peak sun hours. Is renewable energy going to provide reliable and cost effective power to Australian residents?

Community engagement

When it comes to renewable energy infrastructure projects, including transmission lines, community engagement has been poorly executed to date. The use of the phrase community engagement suggests to me that companies, and Government, should be involving those affected by the proposed projects to achieve the best outcomes. I do not believe there has been one developer, or Government agency, who has sought to collaborate with, or involve community in decision making, rather used information sessions to inform community members of previously made plans. There is so much information that is not available to the public during the planning process, and while that may satisfy the guidelines, it does not foster transparency and therefore good relationships with those most affected by proposals.

The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised.

The Community Impact Survey, conducted by Property Rights Australia and NREN, collecting 775 responses between Saturday 12th April and Friday 10th May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity.

The results from these two consultations highlight the issues within the renewable energy sector regarding community engagement!

Attached documents:

1. AEIC Community Engagement Review – February 2024
2. Community Impact Survey – Property Rights Australia and NREN – April & May 2024

Warrumbungle Shire Council

The Assessment Report states that “the Department notes a solar farm would otherwise be a prohibited land use in the RU1 zone under a strict reading of the Warrumbungle LEP. However, based on a broader reading of the Warrumbungle LEP, and consideration of the objectives of the RU1 zone and other strategic documents for the region, the Department considers that there is no clear intention to prevent the development of a solar farm on the subject land.”

I request, as a ratepayer of the Warrumbungle Shire Council, that DPHI and the IPC take a strict reading of the Warrumbungle LEP as I believe the document was intended.

ACEN Australia

I attended the IPC Birriwa Solar Site Inspection on Tuesday 4th June as an observer. I found myself underwhelmed by the Project Development Managers knowledge of the project.

The ACEN Australia employees representing the developer at the IPC public meeting held in Dunedoo on Wednesday 5th June were seen giggling when one community member was speaking about sheep being injured, and ultimately dying, following being caught in the mechanics whilst grazing under an existing solar installation.

There was a verbal agreement made with the previous Birriwa Solar Project Manager to retain the aforementioned planted trees on the property my parents owned throughout the 1990's. It seems this agreement was made only to appease a community member with no intention by ACEN staff to follow through. There is a long held tradition in rural Australia of handshake deals and your word being your bond – unfortunately renewable energy developers seem to disregard agreements without appropriate paperwork to validate any promises.

Department of Planning, Housing and Infrastructure

On 17th January 2024, I emailed a member of DPHI staff to request information regarding the LUCRA for Birriwa Solar and consequence rankings for potential impacts of the project. On 20th February, after requesting information from a different DPHI staff member about another renewable energy project (15th February) and not receiving any reply I forwarded both emails to DPHI's Executive Director, Energy, Resources and Industry to escalate the lack of response. A member of staff made one attempt to call me on March 8th, and I returned the call the following day with no further response. I emailed a different member of the DPHI Energy Assessment team on April 5th which resulted in another attempted phone call which I returned the next day with no response following. On May 13th I emailed the original member of staff I had contacted regarding the Birriwa Solar project and requested answers to my questions via email seeing as connecting via phone was proving difficult. It took another three emails until I finally received a response on the 31st May 2024. These were not complicated queries yet DPHI chose to ignore my requests for months – how many other queries have been ignored?

I would like it noted that the DPHI Assessment Report has been created in such a way as to prevent the public using the search function or copying and pasting sections of text to reference.

Inaccuracies and mistakes

The Birriwa Solar Bushfire Assessment states “there are no recorded fires on or near the proposed project site. In 2017, the Sir Ivan fires affected managed rural properties and forested crown lands, greater than 50km from the study area.” This statement is completely inaccurate, rather deceptive and certainly not acceptable! I acknowledge that ACEN Australia recognises the 1979 fire, which burnt on the project area, in their response to submissions but seems to understate the Sir Ivan Fire purely because it did not burn on the project area.

As stated by Iwan Davies at the IPC meeting held in Dunedoo, DPHI made an error in the Assessment Report stating there is “8.9 million ha of land currently used for agricultural output in the CWO REZ”. I wonder if there are other errors in the Assessment Report that have not yet been identified?

Recommended conditions of consent

Whilst I would like to reiterate that I do not believe the Birriwa Solar project should be approved the following are conditions required if consent is considered:

- any landowner within 50km of the project must be indemnified against insurance liability for any damage caused to the Birriwa Solar project
- management plans (ie. Emergency Management Plan, Bushfire Management Plan, Fire Management Plan, Emergency Response Plan) will be written in consultation with the local employees and/or volunteers of appropriate agencies/departments
- ACEN Australia must have neighbour agreements signed by 90% of direct project area neighbouring landowners signifying their acceptance of the project prior to consent being granted
- ACEN Australia must have a voluntary agreements with over 80% of landowners with a non associated residence within 2km of the project area prior to consent being granted
- intentionally planted tree blocks must be retained (see map above)
- proposed visual screening must be completely effective at the end of the construction period and be maintained/replaced by the proponent for the life of the project

- ACEN Australia will be liable for any stock losses or infrastructure damage caused by a fire originating at the project site regardless of the affected property insurance coverage status
- all operational staff will be trained Rural Fire Service volunteers and will be available to assist at any fire within the district (20km radius of project site)
- the project site, including accommodation camp, will be protected by two RFS category 1 equivalent fire trucks manned by ACEN Australia employees or contractors
- there will be an independently employed officer on site at all times during construction to monitor compliance of conditions of consent (ie. road use). Any breaches will result in the cessation of all construction works until investigated and rectified
- there must be an agreement in place regarding water sources, to be used for construction and operation, and for the accommodation camp, prior to consent
- water testing downstream of the project must be carried out monthly by an independent laboratory, both during construction and operation, to ensure no toxic material is being washed into waterways from the solar installation
- any erosion will be rectified at the expense of ACEN Australia

Conclusion

"The Department considers the project would not result in any significant impacts on the local community or the environment, and any residual impacts can be managed through the implementation of the recommended conditions." What constitutes significant, and to whom? Is it significant that one landowner will have all of the runoff from the Birriwa Solar factory traverse through their property? Is it significant that 22 non-associated residences are located within 2km from the proposed installation without their consent? Is it significant that a quiet, rural locality will become a bustling construction zone for more than two years, and then turn into an industrial wasteland?

Concerned local landowners and community members have been raising many of the issues I have outlined above, and more, since members of the public first learned about the proposed Birriwa Solar project. The directly affected and broader community believe a lot of these issues have been glossed over, dismissed or inadequately addressed by the proponent and DPHI. The guidelines allow so many crucial details to be finalised post development consent, without community consideration or input – leaving the proponent with various options that members of the public do not get a chance to comment on and potential major impacts to the community unaddressed.

"On balance, the Department considers that the project is in the public interest.." I wonder if 'the public' is considered to be local and directly impacted communities or the public on the eastern side of the Blue Mountains? It seems that rural and regional NSW is bearing the brunt of impacts due to the "rapid transition to renewable energy" and benefitting the least.

As per the Warrumbungle Shire Council recommendation, I request that the determination of the Birriwa Solar project is deferred "until such time as the cumulative impacts of the more than 40 large scale wind, solar and transmission projects across and adjacent to the Central West Orana REZ are adequately identified and the environmental, social and economic costs are properly compensated". I urge the Independent Planning Commissioners tasked with determining the Birriwa Solar project to NOT grant consent.

Yours Sincerely,
Emma Bowman

Birriwa Solar IPC meeting speech 5th June 2024

(Slide 1) Good afternoon chair, commissioners, ladies and gentlemen. I am a fifth generation farmer from Dunedoo and I am deeply concerned for the agricultural industry and rural and regional NSW, and Australia, with regard to the "rapid transition to renewable energy". My community, here in Dunedoo, is at the centre of the current proposals for the Central West Orana Renewable Energy Zone; Birriwa Solar project is just one such development.

(Slide 2) The people most affected by the "rapid transition to renewable energy" are those who have fed and clothed the population for generations. The connection to the livestock we run and the country we

care for is in our blood. That is why turning rural landscapes into an industrial setting is unfathomable for so many of us. To hear proponents and DPHI project assessors deem the impacts to surrounding landowners and communities as “minor”, “insignificant” or “negligible” is an insult to our way of life and the things we value most. Not only will our landscape be forever altered, the majority of these projects also pose an enormous threat to our personal safety, and that of our livestock, wildlife and environment.

(Slide 3) According to the Parliament of Australia “social license to operate has been defined as an ongoing acceptance of a project by the community and other important stakeholders.” During the exhibition period of the Birriwa Solar EIS the Department received 89 unique submissions from the public, of which 85 objected to the project. The exhibition period for the amendment report elicited 45 submissions, all of which were objections. I believe that is enough evidence to suggest ACEN does not have social license for the Birriwa Solar project.

(Slide 4) The DPHI Assessment Report states that “the project would not significantly reduce the overall agricultural productivity of the region and the site could be returned to agricultural uses in the future.” The Department has calculated a combined development footprint of proposed, approved and operational SSD solar projects within the Central West and Orana Region. The Department declares that “the loss of 15,837ha of agricultural land represents a tiny proportion (0.18%) of the 8.9 million hectares of land currently used for agriculture in the CWO REZ. It would result in a negligible reduction in the overall productivity of the region.” This statement is not only inaccurate, but misleading, as the CWO REZ is made up of 2 million hectares making the actual percentage of agricultural land lost to solar within the CWO REZ boundary close to 1%. This figure does also not take into account agricultural land lost to transmission infrastructure, BESS projects and proposed wind installations giving a false view of the potential impacts to agriculture in the area.

(Slide 5) The development footprint for ACEN’s Birriwa Solar is 1,197ha. Whilst there are some exceptions, this amount of land within the Central West Orana Region is capable of producing enough red meat - beef, lamb and/or mutton, to feed 1,300 Australians per day, based on the 100g average daily red meat intake. That’s 474,500 Australian red meat intakes in a year produced from the land potentially being lost to the Birriwa Solar project. The same land is capable of growing enough wool to produce 27,500 pure wool jumpers each year; imagine how many socks or wool blend garments that would be. Over the whole CWO REZ that’s more than 6 million average Australian daily red meat intakes or 360,000 pure wool jumpers lost per year. I do acknowledge the Department statement “that ACEN intends to continue grazing concurrently with the operation of the solar” project. I question how this will be possible given the EIS states that “farm dams may be filled in” if it “does not have adverse hydrology impacts” and there is a distinct lack of underground water in the study area?

(Slide 6) The Department of Primary Industries Agriculture Industry Snapshot for Planning August 2020 states “the Central West Slopes and Plains has the advantage of large areas of unfragmented land that allow the achievement of economies of scale for broadacre agriculture including irrigation. This coupled with suitable soils and water supply, infrastructure as well as access to markets in Dubbo, Orange, Sydney, and Newcastle make the Sub Region one of the most successful and profitable in NSW.” The same document also says “future land use planning must recognise the importance of agriculture to society and the economy and that the land and resources on which agriculture depend need to be protected and managed to enable continued use of the land for agriculture” and, “land use planning needs to recognise that it is not only agricultural land with excellent biophysical characteristics that needs to be retained for agricultural purposes, but also those key secondary supporting industries which may be located on lower quality agricultural land which are still potentially impacted by encroaching non-agricultural land uses.”

(Slide 7) The same document declares there is a “need to protect land for its future productive capacity particularly where there is a combination of biophysical assets such as water, topography and soils. The Central West Slopes and Plains Sub Region supports high value agriculture now and will be important to sustain production of more specialised agricultural and horticultural enterprises into the future.” I

wonder what has changed in the four years since the NSW DPI Agricultural Landuse Planning Team released this publication?

(Slide 8) Could one of the major issues be the lack of understanding of agriculture and rural NSW by the DPHI staff who are assessing the proposed renewable energy infrastructure projects? Or, could it be that agreements signed by our State and Federal Governments regarding Net Zero completely overshadow and/or disregard the importance of agriculture?

(Slide 9) On the 11th February 2017 the Sir Ivan Bushfire started approximately 15km east of Dunedoo. Due to intense heat and wind the fire burnt over 50,000ha of mostly farmland, a length of approximately 50km, in the Dunedoo, Coolah and Cassilis districts, within three days; burning just 7kms from the project area. Homes and infrastructure, livestock, habitat and wildlife were ravaged, the scars of which are still visible today. Whilst there is no clear acknowledgment regarding firefighting limitations to date from the RFS bureaucrats, it is obvious to those of us who have been involved in previous firefighting efforts that areas with renewable energy infrastructure will be avoided by planes and helicopters, for operator safety, and ground crew access will be limited during bushfires that could well be a life and death situation not only for livestock and wildlife but for local residents.

(Slide 10) How will we adequately protect ourselves, our homes, our livestock, our environment and our wildlife, and who will be held responsible for any losses incurred if protection measures are restricted by such infrastructure?

(Slide 11) The devastation and destruction left behind after catastrophic events such as the 1979 bushfire, which burnt on the project site and claimed one human life, or Sir Ivan is cleaned up by landowners and community members – the majority of whom are objecting to projects like Birriwa Solar. I believe it would be prudent for those assessing and determining the fate of such proposals to seriously consider that fact.

(Slide 12) The Assessment Report states that “the Department notes a solar farm would otherwise be a prohibited land use in the RU1 zone under a strict reading of the Warrumbungle LEP. However, based on a broader reading of the Warrumbungle LEP, and consideration of the objectives of the RU1 zone and other strategic documents for the region, the Department considers that there is no clear intention to prevent the development of a solar farm on the subject land.” Is this statement suggesting that if I were granted a development application for a single storey house but took a ‘broad reading’ of the DA rather than a ‘strict reading’ it would be permissible to build a two storey house? Can the proponent also take a ‘broad reading’ of the conditions of consent for the project and therefore not be held accountable for any breaches?

I request, as a ratepayer of the Warrumbungle Shire Council, that DPHI and the IPC take a strict reading of the Warrumbungle LEP as I believe the document was intended.

(Slide 13) There are many more potentially monumental impacts of large scale renewable infrastructure projects like Birriwa Solar.

Impacts on roads, transport and traffic. Potential insurance liability impacts on agricultural businesses and premium increases for neighbours and the greater district.

(Slide 14) The excessive use of underground water and effects on surface water, sediment and erosion.

(Slide 15) Visual amenity, noise and environmental impacts. Approximately 30 years ago I helped plant some of the trees within the project area. I do not believe it is acceptable to use the Biodiversity Offset Scheme to claim already existing ecosystems as suitable compensation for the destruction of others.

(Slide 16) Not unlike the CWO REZ, ACEN’s Birriwa Solar project has been thrust upon the district without prior knowledge, community input or consent. Consultation within the renewable energy transition has been found lacking, as evidenced by the Australian Energy Infrastructure Commissioners Community Engagement Review and more recently the Property Rights Australia and NREN Community Impact Survey. Personally, I waited four and a half months for DPHI to respond to a query I had about this project, and I only received that reply through persistence and dogged determination on my part.

(Slide 17) Warren Buffet once said “someone is sitting in the shade today because someone planted a tree a long time ago.” I believe this is very apt for three reasons. Firstly, trees do not grow overnight, therefore removing existing growth for the purpose of solar panels is fool hardy and not

environmentally friendly. Secondly, rehabilitating the Birriwa Solar site back to livestock grazing will take decades; livestock need shade and shelter provided by mature trees. Lastly, I believe the “rapid transition to renewable energy” and its potential negative impacts on agriculture and rural and regional Australia is short sighted and fraught with danger. I urge the commissioners to refuse consent to the Birriwa Solar project.

(NB: PowerPoint Presentation in separate document.)

Burrendong Wind

OBJECTION to Burrendong Wind Project (SSD-8950984) (submitted via Major Projects Portal – 17th December 2023)

I wholeheartedly object to Ark Energy’s proposed Burrendong Wind project.

As a fifth generation farmer I am concerned for the rural and regional communities and the Australian agricultural industry with regard to the ‘rapid transition to renewables’. This transition has the potential to take thousands of hectares of land out of food and fibre production (killing small farming communities), and if it is carried out ‘rapidly’, due diligence and sensibility may be lost and cause devastating impacts amongst the effected communities.

My family has been farming in the Dunedoo district for more than 200 years. In my opinion, if our businesses were not ‘sustainable’ we would not still be here. Why then, is some of the most productive land in the state, and country, being used as ‘the renewable power plant of the future’?

Impacts on Agriculture

The New South Wales Government declared the five current Renewable Energy Zones without consulting the rural and regional communities most affected. The Central West Orana Renewable Energy Zone (CWO REZ) covers 20,944 square kilometres, the majority of which is used for agriculture. Whilst not all of this land is considered valuable it all plays its part in producing the food and fibre our state, and country, needs to continue providing for its people. How is the agriculture industry meant to increase food production for the growing Australian population if land is taken out of service to cater for renewable energy projects?

The Burrendong Wind project EIS states, “in addition to supporting NSW State Policy directions and national grid supply benefits, the Project will deliver the following key Statewide economic benefits: support for ongoing industry transition in Regional NSW from agriculture, mining, etc to renewable energy.” Again, how will farmers feed a growing population if we are to ‘transition from agriculture to renewable energy’? Ark Energy are suggesting the two cannot coinhabit!

The Uungula Wind EIS Main Report states “the Central West Orana regional economy has historically been based on agriculture, and it remains one of the most productive agricultural areas in Australia (DPE, 2017). The region features good access to water, high quality soils and suitable climates for a wide range of agricultural pursuits, including broad acre cropping, meat and wool production and forestry. While the total area of land available for agriculture in Australia is large, comparatively few locations have access to all these characteristics.” There are millions of hectares of agricultural land in NSW, but certain areas are conducive to much more intensive production; including, but not limited to the Central West and Orana Regions. How then, are we considering taking so much of this area out of production throughout both construction and operation phases of renewable energy projects?

Traffic & Transport

The transport route for the oversize, overmass (OSOM) components of the wind turbines is said to be from the Port of Newcastle to the project site. The Golden Highway is the funnel from all of western NSW to Port and return; making this highway a carpark (considering the cumulative effect of all the proposed CWO REZ projects) will not only frustrate travellers but have major impacts on all agricultural businesses in the district and state. The EIS states that “police (will be) required to stop eastbound traffic on (the) Golden Highway to allow OSOM vehicles to travel onto (the) incorrect side of the road for approximately 400m on several corners.” These delays will most probably lead to road users making rash and dangerous decisions. How many fatal road accidents will be attributed to the ‘rapid transition to renewables’? How many is too many? There will need to be extensive upgrades carried out on the

Golden Highway, including but not limited to overtaking lanes, road widening, Denman Bridge replacement, pavement upgrades and turning lanes prior to any more development consent in the CWO REZ.

My property is split by the Golden Highway, where it is a double highway (Castlereagh Highway). We regularly walk sheep and cattle across the road but already have issues stopping the traffic to do so. What measures will Ark Energy, in conjunction with other developers, put in place to help me and other farmers in the same situation, get our livestock across the Golden Highway, and other transport routes safely?

How does Ark Energy proposed to maintain the safety of community members on local roads considering the major increase in traffic volumes? I understand current Ark Energy contractors and employees are using Wallawaugh Road as access to the project site. This road is not proposed to be used for access so that should not be happening. Ark Energy staff should only be using proposed routes, otherwise there should be maintenance done on any other roads at the proponents cost.

Saxa Road, part of the OSOM transport route, has been closed to all except local traffic since October 2022. How does Ark Energy propose to use this road as a major transport route?

Bushfire Risk

Appendix M – Bushfire Risk Assessment states in that “overall, the potential risk of bushfires impacting on the WTGs is considered to be low given their robust construction (CFS 2016), provision of APZ, lower likelihood of impact from large bushfire and firefighter resources in the broader locality.” Local fire fighting resources (Rural Fire Service – RFS) should not be used to protect the Burrendong Wind project; instead Ark Energy should be providing resources to protect the surrounding farmland. Rural areas are already struggling to maintain volunteer services due to our aging and decreasing populations. Ark Energy should also not be relying upon Fire and Rescue NSW as this is a resource for the rural and regional population and was not designed to protect major assets like large scale wind and solar projects in inaccessible areas. In response to regional and rural NSW hosting renewable energy projects there should be benefits, like more fire fighting equipment and personnel, not more work for our communities! Ark Energy’s construction and operational staff should have access to adequate equipment (at least two fire trucks - equivalent to category 1 RFS units) and be trained in their use to both protect the project site and the greater district.

During the Sir Ivan Bushfire, in the Dunedoo & Coolah district in 2017, aerial fire fighting assets were used with great success. There were countless homes and livelihoods saved by both fixed wing aircraft and helicopters. How will these operations be carried out effectively, in attempt to save agricultural land, livestock and residences within the project area and surrounds? I don’t imagine there would be a lot of pilots willing to further risk their lives by flying in an area with wind turbines and transmission lines. It will only take one accident to put a stop to any aerial fire fighting assistance within the CWO REZ leaving our communities and farmers very vulnerable. Ark Energy, and all renewable energy proponents, should be required to contact the local RFS brigades, and the closest fire control centres as part of their assessment so the information they are given is location specific, rather than the broader information that is given by RFS head office.

Following a major fire event it is the local community left to ‘clean up the mess’. Many people have helped bury dead livestock, euthanise those too badly burnt to be saved, fixed and/or replaced fences, demolished and rebuilt farm infrastructure, transported livestock to areas with feed or donated fodder after fires have occurred. How will Ark Energy help the community surrounding the project area if there happens to be a major fire event?

Visual & Noise Impacts

Most people who choose to live in rural areas do so for the peace and quiet and the scenic landscapes. The potential visual and noise impacts both during construction and operation are in huge contrast to what rural and regional community members are accustomed to.

Bodangora Wind consists of 150 metre high turbines which are visible from north of Dunedoo, more than 50km away. Whilst this may not be considered visual impact to some people, namely those from metropolitan areas, the vast proportion of rural and regional people are not used to an industrial

landscape, nor do they want to become accustomed to such views. It is proposed that any residences with high visual impacts will have screen planting undertaken 'post construction' to reduce the visibility of nearby turbines. Eucalypts, like those shown in the photomontages, take approximately 20 years to get to the size they are depicted. Will established trees be planted to accelerate the screening benefits? Will Ark Energy care for (water and replace if need be) screen plantings? Keeping young trees alive is very difficult during drought conditions and if established trees are planted they are even harder to care for. This should not be the responsibility of landowners. The acceptable level of shadow flicker is said to be 30 hours per year. How would any of the DPE or Ark Energy staff feel if their residence was subjected to that number of hours of shadow flicker? What about residents who may have epilepsy or chronic migraines? It is not acceptable that anyone should have to endure this burden for any amount of time.

It is stated that there is potential for blade glint to occur. Modern WTG's are often constructed with low reflectivity surface treatments to reduce the effect of glint. Will the turbines installed at the Burrendong Wind project be treated so they are less reflective?

The EIS Executive Summary states "the project is in a predominantly agricultural area with a low population density within and surrounding the project. Therefore, there are limited visual and noise impacts associated with the project." While there may not be a huge population affected by visual or noise impacts that should not diminish their importance. Visual impacts are subjective; the level of significance of such effects should not be made by only someone who does not live on the property, it should be a collaborative approach between those preparing assessments and the landowner.

At the meeting in Mudgee on Friday December 8th Andrew Wilson, General Manager Development NSW, Ark Energy, stated that this project should be relatively easy to get past DPE in regard to visual amenity. In my opinion that is a very inappropriate statement, especially from an employee of the proponent.

Water

Appendix Q – Surface Water Impact Assessment states "the water required for dust suppression will need to be sourced from an appropriate location with the relevant licences. Sources of water nearby are the Macquarie River, Cudgegong River, Burrendong Dam and catchment farm dams (used for stock). Some water may be able to be sourced from the farm dams, but the volume of water required will exceed the water availability from this source. Therefore, water will need to be sourced from the other nearby options or alternative water sources (with relevant licences)."

Water is one of the most important resources in rural and regional areas. The cumulative impact on the CWO REZ's water sources will be major and possibly devastating for the whole district. Stock and domestic water has priority; how does Ark Energy plan to manage water use if the construction timeline happens to coincide with a dry period? Can Ark Energy assure the community in the surrounding area of the project they will not have any restrictions placed on their water use due to the projects' construction?

Due to the importance of water resources to the local community I believe it is necessary for the community to be given the opportunity to provide feedback when Ark Energy has found what they consider a viable water source.

Waste

There is no availability for waste at any local council facilities. Where is Ark Energy proposing to dispose of any project and worker accommodation waste?

The EIS states operation of the wind project is expected to be 30 years. How many parts (ie. blades) are generally replaced in this time? And, how will any waste be disposed of? Are those vehicle movements allowed for in the EIS?

Environmental Impacts

The Executive Summary states that "the project has the potential to have a significant impact on Commonwealth listed threatened species and ecological communities," and "the construction of WTG's has the potential to impact aquatic ecosystems both directly and indirectly." For any project other than renewable energy the risks to animal species and habitat are taken very seriously and often mean

the rejection of development. Why is it that renewable energy projects are being approved with biodiversity offsets instead of being rejected due to possible impacts? The potential effects of not only the Burrendong Wind project on native animals (Burrendong being an Aboriginal word for koala) and habitat but the cumulative effects of all of the projects proposed and operating in the CWO REZ and greater NSW and Australia will be devastating to our flora and fauna. Even one koala, or other native animal, death from this project is too many and should not be tolerated.

The NSW Department of Planning and Environment website states that “the Biodiversity Offset Scheme is the framework for offsetting unavoidable impacts on biodiversity from development with biodiversity gains through landholder stewardship agreements”. I cannot understand how it is acceptable to impact certain areas of habitat or flora and fauna colonies as long as there is similar ‘bought’ to offset the losses. It is also a well known fact that a lot of country that is ‘locked up’ for environmental reasons becomes a harbour for noxious weeds and feral animals, not unlike National Parks. In my opinion, removing fully grown trees without first ‘replacing’ them elsewhere is not good enough. How is Ark Energy going to manage any land that will be used to ‘offset’ the environmental impacts of the Burrendong Wind project? And how many trees will Ark Energy plant, and where, to replace those they will remove?

Will the debris from trees felled to create roads be removed from the site? How will erosion be managed on aforementioned roads straight after construction?

Workforce & Accommodation

At the information session held by Ark Energy on the 8th December 2023 I asked questions around the peak workforce and the workers accommodation strategy. Not one of the four Ark Energy employees in the room could supply the peak workforce figure off the top of their head and I was told it is not yet known where the workforce will be housed.

The EIS states peak workforce is expected to be 375. There are projects in and surrounding the CWO REZ that are already struggling to find enough workers to fill construction positions. How does Ark Energy propose to find 375 workers to construct the Burrendong Wind project especially if there are other projects in the CWO REZ under construction concurrently? What will Ark Energy do to ensure their project does not have a negative effect on the ability for local landowners to find employees?

Biosecurity Risk

There are numerous properties and neighbours involved in this project. How will Ark Energy ensure that no weeds or animal diseases are spread from property to property? How will any procedures undertaken be policed during construction? Already the local community has had too bigger burden placed on it in regard to this project proposal; it should not be left up to them to police any constraints put on the proponent. There should be a dedicated team onsite every day of construction to ensure compliance.

Detailed Design

There are multiple instances in the EIS that states elements of the project will be confirmed during the detailed design process which is to be undertaken post development consent. It is not acceptable that the wider community does not get a chance to scrutinise all detailed design or that detailed design should be undertaken post development consent. Examples of detailed design not included in the EIS are final WTG layouts, infrastructure and elements to be installed or constructed (eg. WTG), the final number and location of telecommunications facilities, road crossings of waterways, port of entry, traffic routes and Biodiversity Offset Strategy (BOS). It is not fair that the public will not get to comment on these final details.

Homes Powered

Advertising material for the Burrendong Wind claims the project is expected to deliver enough renewable energy to power around 247,000 homes across New South Wales. How is this figure calculated? Considering the wind does not blow 24 hours a day, 7 days a week, is the power to 247,000 homes meant to be constant or only when the project is working at capacity?

Local Council

The proposed Burrendong Wind project is located within both Dubbo Regional Council and Mid

Western Regional Council, which means that their Local Environment Plans (LEP's) must be considered. The project is on land zoned as RU1 (Primary Production) and adjacent to land zoned RU3 (Forestry) which prohibits wind energy systems being placed in the RU1 zone. The State Environmental Planning Policy (Transport and Infrastructure) states that development for the purpose of electricity generating works may be carried out by any person with consent on any land in a prescribed rural, industrial, or special use zone. Why do LGA's bother having LEP's if the SEPP can override it without consent of the council, or for that matter the affected communities? How can LGA's advocate for the best for their constituents and environment if the state government can simply override their plans without any local knowledge?

Exhibition period

The minimum 28 day exhibition period for SSD projects is not long enough for community to adequately read and respond to such large documents. The Burrendong Wind project EIS main document is over 500 pages and all documents total nearly 2200 pages. There are a huge number of projects currently going through the planning process in the CWO REZ; it is too much! Proponents engage experts to complete assessments; how is it fair that we, small rural farming communities, are expected to interpret such reports?

It would be a show of good faith to rural and regional communities if developers would work with the Department of Planning and Environment to extend these exhibitions to 90 days minimum. If these projects are to go ahead it should only be with understanding between local communities and the proponent so the impacts are lessened.

Cumulative Impacts

There are only 14 projects listed in the Appendix P – Agricultural Impact Assessment but there are nearly 50 in the CWO REZ that I am aware of. The same paper states, "it is expected that cumulative impacts from traffic volumes will be minimal given most projects identified have already been completed." The cumulative traffic and transport impacts will be enormous when you consider most of the proposed projects have the same transport route from the Port of Newcastle, along the Golden Highway. Every OSOM load I am aware of will travel through the main street of Merriwa, and a lot through the main street of Dunedoo. How are these small towns expected to cope with that influx? Will our citizens feel safe parking in, or crossing the main streets of Dunedoo or Merriwa?

There are also major cumulative effects on workforce, workers accommodation, water, waste, biosecurity risks, environmental impacts, noise, visual amenity, bushfire risk and agriculture. These are all things very important to rural and regional NSW, and Australia, but are being overlooked due to the need to reach the 'green' energy targets our Government has signed us up for and appease the ideals of metropolitan citizens.

Conclusion

Inhabitants of the CWO REZ have been bombarded with scoping reports, EIS exhibitions and other documents (eg. Draft Energy Policy Framework), especially within the last six months. We are tired, frustrated, disillusioned and devastated because we have been deceived and unenlightened about so many aspects of transmission, wind and solar projects. The behaviour shown by EnergyCo and other developers toward landowners and rural and regional communities has been nothing short of disgusting. There is not one place to find the unedited cumulative effects of all of the projects operating and proposed in the CWO REZ because the potential impacts are phenomenal, and such information will make that obvious to the general population.

Personally, I would hate to calculate the amount of time I have spent researching relevant guidelines, legislation, project documents, and trying to educate the broader public about the possible impacts. I am a farmer, and whilst I am doing all of this office work things are not happening on my property that should be. We, as farmers, are expected to keep feeding Australia's growing population, but no more land can be formed so how are we going to keep up?

The undue stress and angst the whole CWO REZ is causing landowners and rural and regional communities is immense and unnecessary. The risk to mental health of our communities is colossal. If

there was adequate early consultation with affected communities the situation may have been lot different. What mental health toll is too much? One death due to the CWO REZ is too many! As previously mentioned, I attended an information session held by Ark Energy at Parklands Resort, Mudgee on 8th December 2023. In my opinion there were no adequate answers, from any of the four employees in attendance, to questions asked by community members. I personally asked questions regarding workforce and accommodation, bushfire risk and fire fighting restrictions, transport routes, number of OSOM loads per turbine and not one question was answered sufficiently (some answers were found by employees in the EIS). This is not acceptable!

Ark Energy should be forced to go back to the drawing board and achieve a better understanding of the proposed project and its potential impacts on the surrounding community and agricultural land before it is considered by the Department of Planning and Environment. This sort of rushed and inadequate planning and assessment is, in my opinion, an example of the pitfalls of the 'rapid transition to renewables', and proof there needs to be more investigation conducted before any more large scale wind, solar or transmission projects are approved.

Emma Bowman

CWO REZ Transmission Project

OBJECTION to CWO REZ Transmission Project (SSI-48323210) (submitted via Major Projects Portal – 8th November 2023)

I whole heartedly object to the CWO REZ Transmission Project.

I am a fifth generation farmer in the tightly held, "safe" Dunedoo district. My partner and I, with help and support from my retired but still very active parents, produce beef, lamb, wool and grain on part of my family's original land. Whilst some of the farming land in the 20,000 square kilometre Central West Orana Renewable Energy Zone is not considered valuable, it all plays its part in producing the food and fibre Australia relies so heavily on. To see this land scarred by transmission lines and covered in wind turbines and solar panels will destroy our picturesque region and its communities, and decimate the agriculture sector in our magnificent country.

Although our property is not, at this stage, directly impacted by proposed transmission lines, it has been devastating to witness the disrespect and disregard shown to landholders throughout the Energy Corporation of NSW's (EnergyCo) 'consultation' process. I use consultation loosely as it has been very poorly executed to date; community engagement should not be a meeting where proponents tell land holders what is going to happen, but an open discussion where community concerns and local knowledge are taken on board! The stress put on effected landholders owing to lack of communication and due diligence has been, and continues to be, colossal and unnecessary.

Legislation

The Electricity Infrastructure Investment Act 2020 was passed through the NSW Parliament, during the height of Covid 19. One of the objects of the Act is "to foster local community support for investment in new generation, storage, network and related infrastructure". The Act also states that "a person or body exercising a function under this Act must do so in a way that is consistent with the objects of this Act." I would suggest EnergyCo have not acted in any way to 'foster local community support' given the examples I will mention further in my submission.

The Act also states that "the Minister may make a declaration" of a renewable energy zone "only if the Minister has considered the following" – "the views of the local community in the renewable energy zone". I was certainly never asked, so whose views were taken into consideration when the CWO REZ was declared?

I request a moratorium on all negotiations and works in the CWO REZ, and the other four REZ's in NSW, until there has been significant consultation undertaken by the relevant authorities with the communities that will be affected.

Impacts on Agriculture

The EIS main report states that approximately 4000 hectares of agricultural land will be unavailable for use during construction, 2700 hectares during operation. Of the almost 4000ha of land needed for construction 92% is used for agricultural purposes, 72.5% for grazing and 19.5% for cropping. Taking this area out of production will have many consequences for the agricultural sector and the ability of farmers to produce food and fibre. The construction period will force a lot more than the above predicted area out of production. When fences are cut or removed to allow access to machinery and/or transmission towers be built and lines be strung livestock will have to be moved elsewhere (some properties will not be operational at all). Depending on the time of year construction may also result in crops not being sown. The cumulative impact, when you consider all the proposed wind and solar factories will be enormous. What measures has EnergyCo put in place to minimise the impact to the day to day management of properties (for example: fencing out the transmission line easement and only allowing construction access through that area so livestock could still be contained, and providing watering points where paddocks are split due to the easement)?

According to the EIS main report 75 percent of the construction area consists of land having moderate to low capability, 16 percent of moderate, high and very high capability land, the remaining land being classed as low to very low capability. As I have previously stated, although studies may deem agricultural land of low capability most farmers have set their businesses up to use their land to its potential, or have changed their methods to suit their land. There are a lot of generational farmers in this district, and all of Australia, who have learnt from their forebears, and their own experiences, how to best utilise their land. For example, some farmers own grazing country and farming/fattening country – sheep and/or cattle are bred on the grazing country and then moved to the farming/fattening country to grow and ready for sale, and crops can be grown on the ‘better’ country to store and use as fodder during dry times. Limiting the use of agricultural land (some farm machinery will not fit under transmission lines therefore cutting off parts of properties for farming use) will drastically change some farming businesses, and possibly limit their viability.

The construction area is said to contain around 150ha of mapped BSAL (biophysical strategic agricultural land), which is defined as being “land with high quality soil and water resources capable of sustaining high levels of productivity.” The distribution of SSAL (state significant agricultural land) is supposedly similar to BSAL, 150ha. The NSW DPI states, “the biophysical attributes of SSAL represent the most capable, fertile and productive agricultural lands in the state, and support a variety of agricultural industries operating successfully.” The breakup of the use of BSAL in the construction area is as follows:- 15ha for access tracks, up to 2ha for the construction of the M7 switching station, 29ha for the construction of transmission line towers, and 108ha located within the transmission line easement. If Australia is to continue producing food and fibre for its population prioritising this land for industrial use rather than agriculture is absurd! I believe a more thorough investigation needs to be done into removing the infrastructure from this very valuable land.

As specified in the EIS main report it is expected there will be a loss of agricultural production of around \$4.04 million, or \$1.35 million per annum due to the transmission line project construction. It is stated that “this is equivalent to approximately 0.21 percent of the total gross value of agricultural production across the four impacted LGA’s over the same time period.” The percentage looks minute as it is taken as a percentage of the whole of the four LGA’s, not all of which are even within the CWO REZ boundaries. I request this be changed to a percentage of the construction area, or at the very least the study area to make the impact more realistic.

The main EIS report states that potential impacts to livestock enterprises, ie. livestock being disturbed by construction activities and vehicle movement, would be minimised through consultation with impacted owners. I expect this ‘consultation’ be much better conducted than EnergyCo’s attempts thus far. It is also said that “disruption may occur if water pipelines or fences are damaged, or gates left open”. In my opinion this is not good enough! The construction workers should be inducted to the highest standard of work ethic so if there is a pipe or fence damaged it is fixed in a timely manner and

gates should never be left open without permission from the landowner. If stockyards or loading facilities would be impacted by construction this should be rectified prior to the works beginning.

The restrictions on landowners, workers, livestock and equipment are deemed to be insignificant once the transmission lines are operational. I find that hard to believe as the height of agricultural machinery is not to exceed 4.3 metres above ground level under transmission lines. There are many farmers in the project area who have equipment that does not meet the requirement to fit under the lines, one such farmer who normally transports his air seeder down a designated laneway which the proposed transmission line crosses several times, meaning he will have to take the machine onto the highway, requiring two escorts. Another whose property is cut in half by proposed transmission lines that will have no way to harvest half of his property due to lack of access.

GPS is relied on heavily by those with farming operations. The EIS states that “if the project causes nuisance interference, it would be investigated in consultation with the landowner, and may require signal boosting equipment or antenna enhancement to alleviate the problem.” This should not have to become a problem before it is investigated and resolved! There should be more thorough investigation done to establish if this will or will not be an issue and appropriate action taken prior to construction.

Aerial operations are often undertaken on farming properties, whether for pest control, weed control, fertilising or firefighting. There is becoming more reliance on drones for livestock monitoring and possible pesticide spraying. This project could severely impede options for farming enterprises and ultimately impact the businesses bottom line.

Biosecurity is a major issue for rural and regional NSW. It is acknowledged that this project has the potential to introduce or spread diseases, both animal and plant, weeds and feral pests if not properly managed. Such a large increase in traffic and construction equipment traversing all over the district, throughout many properties every day, is bound to move noxious and other weeds and livestock diseases. I note that the “landholders consulted confirmed that OJD is not a substantial problem as it is currently well managed.” OJD was diagnosed on my property about 5 years ago, and we had run a closed sheep flock (except for rams) for many years before that. The origin of the OJD infection on my property has not been investigated, nor found, which I conclude means there are other infected flocks in this area (my property is approx. 8km east of Dunedoo, so is not far from the project area). I know from personal experience how costly OJD is and the toll it takes financially, physically and mentally so would not like to see it spread. There would need to be very stringent measures taken, and regular checks carried out, to protect the project area, and greater district, from biosecurity risks.

Traffic & Transport

Technical Paper 13, Traffic and Transport, states that the “impact of the predicted increase in traffic volumes generated during construction to the road network’s capacity and efficiency are minor, attributed largely to already low traffic volumes on each construction route with respect to spare mid-block road capacity”. When highways in the project area are rated at having the capacity to handle 1800 vehicles per lane per hour, main roads 1400 vehicles per lane per hour and local roads 1000 vehicles per lane per hour the increase of 100 vehicles per hour during peak construction does seem minimal. However, this is a major overestimation of possible road capacity! Not to mention a lot of the roads rated as “bidirectional two-lane road (one lane in each direction), 100km/h (rural speed limit)” do not have the capability for two vehicles to pass each other, for example, Birriwa Bus Route South. To upgrade these roads to the aforementioned specification there would need to be a lot of trees removed, and major works to prevent future erosion. Safety, of construction workers and locals, is a major issue with these roads.

It is also stated that “the project has negligible impact on the active traffic network and accesses to affected properties”. Current property access traffic movement would be extremely low, in some cases lucky to be one vehicle per day. To say going from one vehicle per day to 32 per hour (20 of which are heavy vehicles) is ridiculous!

The Central West Cycle Trail has routes throughout the CWO REZ, some of which will be heavily impacted by the transmission project construction. The safety of cyclists will be risked by construction traffic, but to my knowledge the CWC committee have not had any contact from EnergyCo at this stage.

The Golden Highway is a major thoroughfare for freight to and from the Port of Newcastle. The whole road acts as a funnel for getting commodities to and from Western NSW, often needing to happen in a timely fashion. The impact of the traffic from not only the CWO REZ Transmission project, but the cumulative impact from all of the other proposed wind and solar projects in the CWO REZ, will be astronomical and could cost the agricultural sector dearly.

The OSOM transport route for this project from the Port of Newcastle is said to be via the Hunter Expressway and Golden Highway. Not only is there a major issue with the Denman Bridge not being suitable for this traffic, there is also the issue of all loads going through the main street of Merriwa and a significant amount through the main street of Dunedoo. This will put the safety of our local communities under threat, and affect the peaceful nature of our rural towns!

The crash statistics were taken between 2016 and 2020 (2020 being a Covid lockdown year). The traffic on the Golden & Castlereagh Highways increases dramatically every year. The number of accidents will surely rise with the increase in traffic from the transmission project construction. The last accident that occurred on the Golden Highway near Cassilis closed the highway for nine hours. Local community volunteers are often the first responders to these accidents (through roles in SES, VRA and RFS), how does EnergyCo propose to support these organisations with extra staff to cater for the possible increase in traffic accidents?

There are numerous properties that are split by the Golden and Castlereagh Highways, and regional, main and local roads. This means it is necessary for farmers to walk sheep and cattle across, and in some cases along, the road corridor. These crossings are not made at certain times of day or on the same day every week, but when the need arises, and sometimes at very short notice. Stopping vehicles is already an arduous task even though the road rules dictate drivers must give way to farm animals on the road. The major increase in traffic, especially drivers not used to travelling in rural areas, will make these crossings much more difficult and dangerous.

“Merotherie Road was inaccessible during the time of survey due to a major flooding event, which resulted in no traffic volumes recorded on the road”. To upgrade a road, of which 1.7km is a flood plain, to be used as a major access route is absurd. The effect any upgrades will have on the Talbragar River system will be extensive; from the change in flow rate to the probable new drainage lines as a result of flood water not being able to spread out over the whole area. The cost to the taxpayer of a new bridge over the Talbragar River on the Merotherie Road, to cater for the OSOM loads, will be colossal. Both of the above reasons lead to the conclusion that the proposed site for the Merotherie Energy Hub is unsuitable!

Rural and regional roads are in a desperate state of disrepair after the flooding, and continuous wet weather, that followed the last drought. Local councils have not been able to get on top of these problems for many reasons including funding and staff shortages. Whilst I assume EnergyCo will repair any pavement damage caused by the increases of traffic due to the transmission project the major destruction done to the foundations of our local roads may not become evident until the construction period is well and truly over; then who will be responsible for the repairs?

Technical Paper 13 states, “upgrades to relevant intersections on Merotherie Road, Spring Ridge Road and other intersections would be required to ensure safe construction access. It is to be noted that these upgrade works would be completed as part of a separate works package and Review of Environmental Factor (REF) process carried out by EnergyCo. EnergyCo intends to assess and determine the road and intersection upgrades under Division 5.1 of the *Environmental Planning and Assessment Act 1979* to allow these time critical works to be determined and commence construction prior to the determination of the CSSI application. However, the road and intersection upgrades are also included in

the EIS so that in the event they are not determined under Division 5.1, they can be approved under the CSSI application.”

This statement refers to the replacement bridge over the Talbragar River on the Merotherie Road and the following roads and intersections:-

- Merotherie Road
- Spring Ridge Road
- Spring Ridge Road/Dapper Road intersection
- Golden Highway/Spring Ridge Road intersection
- Neeleys Lane/Ulan Road intersection
- Golden Highway/Ulan Road intersection
- Merotherie Energy Hub Access Road/Merotherie Road intersection
- Merotherie Road/Golden Highway intersection

I would like to request this process is made public via advertisement in the Dunedoo and Coolah Diaries and through EnergyCo’s CWO REZ newsletters to give the affected communities the opportunity to comment on these works prior to approval.

The EIS main report states “it is noted however that the need for additional road upgrades may also be identified as part of ongoing design development.” I would also request these potential upgrades be made public through the above means. I find it unacceptable that the EIS can be released and perhaps approved without all of the possible road upgrades listed and thoroughly investigated. The traffic and transport studies are not complete and should be treated as such by the NSW Department of Planning and Environment.

Flooding

Throughout Technical Paper 15. Flooding, the phrases ‘detailed design’ and ‘further refinement’ are regularly repeated. How can such a major proposal be put forward for planning approval without the knowledge of how to overcome significant issues and how is the general public expected to comment without all the facts? This project could have devastating effects on the river system in the CWO REZ area and beyond.

Merotherie Road is the proposed major access route for the Merotherie Energy Hub, yet 1.7km of it is a flood plain. During the time of traffic survey for this EIS, Merotherie Road was “inaccessible due to a major flood event”! It is proposed the road will be upgraded and a replacement bridge constructed over the Talbragar River. Engineering solutions will always have impacts on the natural environment. At present the flood water comes up, crosses the Merotherie Road flood plain and subsides without serious or long lasting disruption to agricultural activity. Upgrades with culverts and other man made materials will cause flooding upstream and concentrate flows downstream which will result in significant erosion and reduction in available agricultural land and create new drainage lines and artificial water courses.

This technical paper states that “while the sites of the proposed New Wollar Switching Station, Merotherie Energy Hub and Elong Elong Energy Hub are not impacted by mainstream flooding, they are all presently inundated to varying degrees by overland flow that is conveyed along a number of local drainage lines that run through each of the sites. The thirteen sites where the 330 kV switching stations are proposed to be located are also not impacted by mainstream flooding. However, twelve of the thirteen sites would be inundated by overland flow due to local catchment runoff to varying degrees (the exception being switching station M1).” This suggests the sites are inappropriate!

It also states that “the New Wollar Switching Station and the energy hubs all have the potential to impact on flooding and drainage patterns due to:

- i. an increase in the rate and volume of runoff from the substation pads, access roads and other hardstand areas within the switching station and energy hubs, which in turn has the potential to increase the rate and volume of runoff being conveyed in the receiving drainage lines
- ii. the redirection of flow along diversion channels and culverts that are proposed to control runoff through the switching station and energy hubs, which in turn has the potential to result in a redistribution of flows in the receiving drainage lines.”

Yet the impact on flooding in the area is deemed minimal!

The impact of work sites and construction on the surrounding major and minor water courses is shown in the EIS technical report to be substantial. There are considerable changes in peak flood levels and the extent and duration of flooding due to the energy hubs, switching stations, transmission line support structures and access roads and tracks. While a lot of the increases are stated to be less than 10%, the impact on agricultural land will be immense, especially to neighbouring landholders. There is the likelihood of changes to current water courses due to the “series of diversion channels and culverts” proposed to be “installed to convey local catchment runoff through and around the site in order to manage the impact of flooding on the switchyards, transformers, control buildings and associated infrastructure”. I did not find in the EIS where the impacts of diverting water from current water courses on neighbouring landholders would be taken into consideration.

During the construction period there will be disruptions to contour banks and waterways on properties where easements have been acquired. If there is a large rain event during this time the damage would be catastrophic to not only the land in the construction area but everywhere downstream. There is also the potential for erosion due to earthworks within the energy hubs and switching stations. When this point was raised with EnergyCo staff at a drop in session in Dunedoo on 11th October 2023 the response was that the damage done would have to be rectified. When erosion occurs from flash flooding, soil often ends up kilometres away from where it started, meaning new soil would have to be sourced to remedy the issues, with which comes a lot of biosecurity issues. There are many watercourses that will be crossed frequently during construction and therefore have access tracks created. As with all disturbances to soil around water the potential for scouring increases. Once this damage is done it is near impossible to repair. All of these risks need to be examined in much more depth before construction begins.

This transmission project has the potential to cause extensive and irreparable damage to the above ground water system in the area covered by the Central West Orana Renewable Energy Zone. EnergyCo needs to further investigate the potential impact on flooding by ground truthing all the previously supplied information provided by desktop studies and engaging landholders with local knowledge to increase the proponents understanding of this matter. The ‘detailed design’ surrounding flooding needs to be released for public comment before any construction, including road upgrades, is undertaken.

Bushfire Risk

The bushfire history in the EIS is incomplete. Whilst the Sir Ivan bushfire is mentioned, the major bushfire that started between Dunedoo and Cobbora in December 1979 as more than one fire, and burnt nearly to Ulan, impacting a fair amount of the proposed project area is not referred to. Both of these fires had dramatic and vast impacts on our local communities including, but not limited to, livestock losses, loss of homes and farm infrastructure, and in 1979 loss of human life. The cost of these major bushfires is not just financial. My personal experiences of fighting the Sir Ivan fire and helping affected landholders afterward has left me with memories I would rather forget (euthanising sheep with ears and mouths burnt off, picking up a pile of dead lambs on a fence caught up and burnt trying to escape and seeing the most resilient farming families brought to their knees, just to name a couple). The aerial firefighting assistance during the Sir Ivan Bushfire was invaluable. The planes and helicopters saved countless homes, livestock and agricultural infrastructure.

The technical paper relating to bushfires states that “there are no identified difficulties in accessing and suppressing fires that could occur within the operation area. The overall operation area is characterised

by gently undulating grasslands and some discrete areas of woodland and forest vegetation. The areas surrounding the project are broken up by farmed areas, roads, powerline easements and other small breaks providing a range of suppression options (both land and aerial) based on specific conditions during a bushfire.” While the transmission line alone is said not to impact aerial firefighting, which I could not disagree with more, the cumulative impact of having numerous wind turbines in the same vicinity will likely decrease, if not stop, the aerial assistance during a bushfire event, and having major solar installations near the lines will severely effect ground firefighting efforts. I notice it is the bureaucratic arm of the Rural Fire Service, not the local volunteers or even the nearest control centre, that is contacted to comment on this sort of project. I request that the nearest RFS control centres, being Mudgee and Coonabarabran be contacted for their opinion on the impact the transmission line project, combined with the wind and solar factories, will have on aerial and ground firefighting efforts in the region.

There are enough bushfire ignition risks in rural areas without adding massive transmission lines and wind and solar installations. The EIS states, “the project is located in an area with significant potential to carry large scale and intense bushfires, and construction activities within the construction area have the potential to cause a bushfire and therefore a risk to public safety” and “the risk of bushfire from project construction activities has been assessed as extreme.” These statements alone is enough to suggest our area is going to need a greater force of firefighters and equipment during the construction period.

Transmission lines have long been recorded as fire ignition sources. “Six of the major fires on “Black Saturday”, February 7th 2009, were caused by faults in the electrical distribution network. These wildfires collectively burnt over 270,000ha, caused the death of 159 people and destroyed 1832 homes” in Victoria. Technical Paper 10, Bushfire, also states “of note the research concludes that electrical fires have a propensity to become large fires compared to those from most other fire ignition causes, because they are more likely to occur when conditions are conducive for rapid fire spread. As such, the risk of bushfire ignition on days of elevated fire danger is high and the consequences are high.” EnergyCo should be supplying the project area, and its local communities with extra firefighting equipment and staff/volunteers for the construction period and life of the project to help protect the region. The RFS is not a mythical creature that appears only when there is a fire; it is a group of volunteers made up mostly of farmers and landholders who dedicate their time to defend our homes and livelihoods.

The bushfire technical paper states that there will be 20,000L static water supply at workers accommodation camps for firefighting purposes, and a 38mm storz outlet on each tank. “Firefighting equipment (inclusive of a slip on unit) will be maintained and/or accessible to all active construction site personnel during the declared bushfire danger season and site personnel trained in its use.” This implies EnergyCo are expecting our local RFS and Fire & Rescue units will be made available to fight fires within the project area and at construction sites and workers camps. It is not reasonable nor fair that impacted communities should volunteer their time to protect EnergyCo’s assets. There should be a manned Fire & Rescue style truck at each workers’ camp and two manned Cat 1 RFS style trucks available for bushfire fighting. There should also be a minimum of 100,000L of water available for firefighting purposes at each workers camp and construction compound.

Bushfires pose a very serious risk to farming communities as they not only impact homes but livelihoods. If there is a fire caused by the EnergyCo project I expect that all EnergyCo staff, right up the hierarchy will be made available to help euthanise stock, bury dead animals, fix fences, feed and possibly transport remaining stock and comb through burnt houses and farm infrastructure looking for anything of value, all at EnergyCo’s cost. That burden should not also be placed on the affected community!

Visual & Noise Impacts

The visual and noise impacts are assessed by experts who are not local, but generally from metropolitan areas where it is common to see major infrastructure and almost always hear traffic or construction

type noise. These impacts are also subjective; one person may enjoy looking at wind turbines, others do not; how is that calculated? Those engaged to prepare these documents do not live in the proposed project area so are not subjected to the views or noise on a permanent basis. Many people who have lived most of their lives or choose to move to rural areas do so for a slower, quieter, more scenic lifestyle; turning our farm land into an industrial area will ruin that for a lot of people.

Transmission lines are known to be unsightly and noisy during operation. The CWO REZ transmission project has several permanently inhabited residences located within 500m of proposed line routes, some of which are close to double 500kV lines and some close to the triple line made up of two 500kV lines and one 330kV line. The EIS main report states that “where practicable” the line should be located “at least 500 metres from existing dwellings to minimise impacts to visual amenity”. There are numerous dwellings within 500m of the operation area, several within 100m, of the project who will be subjected to noise exceedances, both construction and operational.

Water

The EIS main report states “700 megalitres of water would be required for construction per year.” That consists of around 250ML of non-potable water for dust suppression, earthworks and pavement compaction and landscaping, and 450ML of potable water for general worker facilities and concrete batching activities. The non-potable water is expected to come from rainwater harvesting, reuse of construction water, reuse of treated wastewater and/or groundwater inflows, reuse of treated mine water and unregulated water sources including the Upper Talbragar River Water Source, Lower Talbragar River Water Source and Upper Goulburn River Water Source, under water access licenses for the project. The potable water is expected to come from existing regulated and unregulated surface water sources, and “potable water for human consumption would be supplied from council owned potable water supplies in Dunedoo, Coolah and Gulgong”. 700ML per year is equal to 1.91ML per day. According to a Warrumbungle Shire Councillor, last summer the town of Coolah (722 people – Census 2021) used around 0.62ML of water per day. The proposed usage is a huge amount of water that our towns and farming communities cannot afford to lose, especially if the forecast El Nino continues. Water needs to be sourced from further afield, which will then cause more transport issues.

Waste

Waste water treatment plants are expected to be built at accommodation camps and construction compounds, otherwise it will need to be transported to licensed treatment facilities. “Local waste management facilities closest to the project may have limited or no capacity to accept construction waste from the project (as discussed in Section 18.3) and may also have restrictions on throughput. If closer (but generally smaller) local facilities are unable to accept the waste quantities from the project, there may be a requirement to transport the waste generated by construction of the project (most likely via road transport using heavy vehicles) to larger regional facilities (where permitted by the Waste Regulation) located further away from the construction area. This may have the impact of longer and different waste haulage routes and additional traffic movements on the road network.” More heavy vehicles that our roads cannot handle.

The main EIS report states that “if improperly managed, waste generated during construction of the project has the potential to contaminate soils, pollute water and generate leachate, odours and dust as well as result in associated environmental, health and safety risks.” Is it an independent body that oversees the ‘proper’ management of waste?

“There is the potential for unexpected volumes of waste to be generated, including potentially contaminated material. During construction planning, suitable areas would be identified (within the construction area if practicable) to allow for contingency management of unexpected waste, including contaminated materials.” Does this mean unexpected contaminated waste may be buried within the project site?

“Potential waste management impacts of this project may therefore be significantly exacerbated by the potential cumulative waste management impacts of the relevant future projects.” It is obvious the

waste management facilities within the CWO REZ and wider area do not have the capacity to manage the expected waste generation from the transmission project, let alone the proposed wind and solar installations in the area. This is a major issue that EnergyCo must deal with before construction commences.

“EnergyCo has undertaken a series of studies to guide how cumulative impacts in the Central-West Orana REZ will be managed, including a dedicated study on waste management.” I would like it noted this is one of the 28 documents not yet available to view referred to in the EIS.

Environmental Impacts

It is stated in the EIS main report that there are expected direct impacts to 1032 hectares of native vegetation and the potential to directly impact 33 species of threatened flora and fauna or their habitat, including the threatened Squirrel Glider. There was also koala scat found near one of the roads EnergyCo will use during construction (referenced in the Birriwa Solar Farm EIS). Destroying threatened flora and fauna, and their habitat, should not be permitted, even if there are offsets purchased. I was under the impression ‘green power’ was about saving all of the environment, not just the convenient parts.

Telecommunications and mobile data

The Telstra network would be the most used throughout the project area and CWO REZ. On the Telstra webpage (<https://www.telstra.com.au/exchange/investing-millions-on-regional-rural-and-remote-coverage>) it states “we have a longstanding commitment to provide connectivity to regional, rural and remote areas. Telstra is more than just another telco; it’s often the only telco.” “Our commitment to regional areas is about more than just giving people a good network to stream movies on. With the pandemic driving a massive surge in online services – especially from the government – it’s about making sure everyone can benefit and thrive in the new digital age.”

Even with our current population the network is struggling. It is obvious when the bulk of people wake up in the morning and start using their devices and when children get home from school, also on days when the weather is not conducive to being outside (raining or very cold). The increase in population in the area, even by just the EnergyCo workforce, will have a major impact on our connectivity, not to mention the cumulative effect of the whole of REZ potential workforce. Having access to the internet is no longer optional, and the transition to renewable energy could have vast detrimental results to connectivity in regional NSW.

During the Sir Ivan Bushfire in February 2017, we lost all mobile phone service. Evacuation text messages were received days after they were sent, which was too late. There needs to be major upgrades done to the rural and regional telecommunication network prior to any CWO REZ construction commencing.

Workforce & Workers Camps

There are two temporary workers camps currently proposed for the CWO REZ transmission project. One at Neeley’s Lane, Cassilis, for 600 workers, and the other at the Merotherie Energy Hub, for 1200 workers. Forcing farming families to live so close to hundreds of people, in isolated areas, is appalling. There are often women alone with small children in these areas. What restrictions will EnergyCo put in place to keep all the families in our district safe? Will the camps be fully enclosed by fencing and manned by security personnel? Will there be a no alcohol policy, and will there be drug testing carried out?

As discussed earlier in my submission, the equipment outlined in the EIS for firefighting purposes is not adequate for protecting the construction area, neighbouring and local properties, nor the workers accommodation facilities. If there is a major fire event, where will the workers be evacuated to? Our local towns and villages cannot handle that sort of influx of people, especially during an emergency. The EIS states “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.” Employers in this

region have been struggling to find workers for years; anyone who lives in the study area would have a job if they want one so the CWO REZ transmission project, and the solar and wind projects will poach employees from businesses in the region, causing more issues for small business and local councils. It also says, “this assessment assumed that 90 per cent of the required direct construction workforce for the project would reside in the workforce accommodation camps and that none of the wages of these people would be spent in the regional economy.” This leads me to question where the benefits of this project, and the whole CWO REZ are for the local communities, especially small business in rural towns?

There is provision for first aid facilities and a full time medical practitioner or paramedic at the workers camps. This is apparently to minimise the impact on the local and regional health services. This will work for minor illness but I assume if a worker becomes very ill or has a serious accident an ambulance will be called and the patient will be taken to the nearest emergency department. As I’m sure EnergyCo has been made aware on a number of occasions the health and emergency services in the project area and surrounds are severely lacking. Wait times to see a GP are normally over three weeks, even in larger towns, the emergency departments in Mudgee and Dubbo are always full to bursting and nurses in this region are always working short staffed. Throwing money at this situation will not fix it; like many others it is based around lack of available work force. EnergyCo should have a dedicated, manned ambulance available for transporting any construction workers should the need arise so the responsibility does not fall on the affected community’s services.

The EIS outlines the demobilisation and rehabilitation phase of the construction compounds and workers accommodation camps but what will happen to that land, which EnergyCo has either acquired, or is in the process of acquiring, once the CWO REZ transmission project construction ends? This needs to be discussed with the local community and decided before construction begins.

I was informed by Mike Young, EnergyCo Executive Director, Planning and Communities, during a phone call on November 2nd 2023 that an expressions of interest campaign should be released by the end of this year to find a specialist provider to roll out a whole of REZ accommodation strategy. Why is this happening after the EIS exhibition period has closed, and so many wind and solar proponents already have plans for their own workers accommodation facilities? This just serves to highlight the chaos and confusion the rollout of the CWO REZ has been tainted by.

Another concern I have is the Merotherie Energy Hub accommodation site being upgraded to house more workers as EnergyCo will own plenty of land to facilitate the increase. I was assured by Mike Young, in the same phone call mentioned above, that this would not be the case, but I would like to see that in writing.

Community consultation & engagement

“In November 2021, the Central-West Orana REZ was formally declared by the Minister for Energy and Environment and EnergyCo was appointed as the Infrastructure Planner (pursuant to section 23(5) of the *Electricity Infrastructure Investment Act 2020* (NSW)) to lead the delivery of REZs in NSW. At this time, EnergyCo assumed responsibility for engaging local communities and stakeholders to inform the development of new transmission network infrastructure within the Central-West Orana REZ.” I would be interested to know where the ‘local community engagement’ was prior to this announcement which has led us to where we are now. Communities that were unaware of the Electricity Infrastructure Investment Act 2020 (NSW)’s existence have since been lumped with the responsibility of becoming a major part of “the renewable power plant of the future” (Penny Sharpe). There are still people in parts of the CWO REZ that don’t even know what it is or that they reside in it!

There have been several survey and consultation periods. One being the “revised study corridor” consultation, during February and March 2022, where “feedback was sought to inform the proposed route for new transmission network infrastructure within the revised study corridor”. EnergyCo received 35 submissions in response to this. 22 of the respondents were local land holders within the revised study corridor; 16 of which indicated they were opposed to hosting transmission infrastructure on their land! The response from EnergyCo to this opposition included “wherever possible, we will avoid

locations where landowners are not supportive” and “we will work closely with any potentially affected landowners to come to a mutually acceptable agreement”. This has not been followed through in my opinion. As pointed out later in my submission there are numerous land owners who still have not negotiated a ‘mutually acceptable agreement’ with EnergyCo.

Another survey was the Stakeholder Listening Survey and it was undertaken by 55 people. I sincerely hope there were not major decisions based on this as it is a miniscule proportion of the number of people that will be affected by the CWO REZ, being over 150,000. There was a survey done by a member of the Coolah community, more specifically targeted at that area that had 130 responses, more than double what EnergyCo achieved throughout the whole CWO REZ. EnergyCo has obviously, in my opinion, failed at engaging the community.

The Community Feedback Report states there were 290 survey responses received during the period from 23rd January 2023 to 31st March 2023. This is still such a small proportion of the population affected by the CWO REZ which shows the lack of effective ‘community engagement’. 72% of the respondents lived in the CWO REZ and their strongest areas of concern included workforce accommodation, impacts to land use and agriculture, roads and traffic, environmental impacts, increased demand for local services, availability of short-stay accommodation, visual amenity and availability of workers. The release of the EIS has not eased the concerns in any of these areas.

EnergyCo held community information sessions in February 2023 in Wellington, Coolah and Gulgong. Why was Dunedoo not included at this time?

It is most disappointing that the majority of the EnergyCo employees with roles centred around community were changed half way through the EIS exhibition period. More frustration has been encountered having to explain existing community concerns to new staff. The structure of EnergyCo staff/consultants should have been much more transparent; I understand there were consultants engaged by EnergyCo but I can find no public record of this. I request an explanation of EnergyCo staff and roles.

There have been many issues raised through community drop in and pop up sessions conducted by EnergyCo. I have raised many concerns at these sessions, but have only received one response, when the employee I spoke to was prompted by a follow up email. Some issues specifically raised at the Dunedoo Community Information Session (11th October 2023) following the release of the CWO REZ Transmission EIS were: the Merotherie Road flood plain, firefighting equipment at workers camps, road ratings and capacities and the use of the name Merotherie for the Energy Hub.

I would like to note that the NSW Department of Planning and Environment have not yet made any effort to engage the communities most affected by all the renewable energy development to educate locals on how best to make submissions and how to use the planning portal.

Social Impacts

The EIS main report states that “community values are diverse across the local and regional social localities. Most of the respondents value the views, natural landscape, surroundings and agricultural potential of their properties. Other valuable factors include sense of community and safety, privacy, nature and the serenity of the social locality.” All of the things mentioned will be irreparably changed due to the CWO REZ transmission project and the wind and solar installations it will bring with it. These are the things that are valued most in our communities but are being tossed aside to make way for a “renewable energy” power system that will not keep the lights on.

Technical Paper 7, Social, states that “while most social indicators were gathered by desktop research, some aspects of the existing environment were obtained through primary data sources, including interviews and an online survey.” To gather most of the social indicators via desktop study is atrocious and highlights again the lack of community consultation.

The time taken to attend meetings, research projects, write submissions to EIS’s and lobby Members of Parliament is taking a toll on those trying to keep up. All of the time we put into matters surrounding the

CWO REZ, as land holders and community members, is unpaid and costly to our small businesses. All proponent employees get paid, but we get nothing!

Affected landholders

Landholders affected by the CWO REZ transmission project have often been treated with complete disregard and disrespect. Most had compulsory acquisition mentioned in their first meeting with land acquisition managers. I have been through the same process with the then RMS during the Golden Highway upgrade so I am aware how much pressure those two words put on people. In the early days of negotiations many landholders were shown maps of the proposed transmission line route but were not allowed to take photos of them or keep copies. What did EnergyCo have to hide? There was also an instance when a land owner was contacted by his land acquisition manager to ask permission for surveyors to enter to his property to 'peg out the boundaries'. The landowner agreed but when he returned to his property the transmission line easement was pegged out. The landowner rang the land acquisition manager only to have him deny the pegs were placed on his property by EnergyCo! Another landholder was told the proposed transmission lines would be placed next to the already existing line easements on his property. When EnergyCo contracted surveyors started looking in another area on his property he was told the easement hadn't been decided, which according to maps was untrue.

The EIS main report states in the avoidance and minimisation of impacts section that "where practicable" the alignment should be located:

- "at least 500m from existing dwellings to minimise impacts to visual amenity"
- "where the alignment traverses through private property, the design has been developed with the aim of positioning infrastructure in areas that align with the current land use activities of these properties (in consultation with landowners where practicable) to minimise impacts to the property and land use"
- "in consideration of landowner feedback, willingness of landowners to host permanent project infrastructure with an easement on their property"

There are two dwellings I am aware of that are both permanently inhabited and located under 500 metres from the transmission lines, one double 500kV lines and the other double 500kV lines and a single 330kV line as well as a switching station. Dwellings 399 and 717. There are numerous others that are within 500m of the proposed project operational area, some under 100m. This is unacceptable and should be rectified. There are several landholders still in negotiations with EnergyCo regarding possible changes to the transmission line route, but have heard nothing for several weeks. How is it expected these landowners, and the broader community, comment on the 'proposed route' when it is not finalised?!? Let alone landholders signing agreements with so few details; my understanding is there has not been any discussion with affected landholders surrounding actual details of the construction process, for example, will the transmission line easement be fenced out or will livestock not be able to be run on affected properties? These details should be made available not only to the affected landholders but the general public as a show of transparency from EnergyCo.

The landholders I have heard from have certainly not been consulted about the "current land use" or "minimising impacts to their property or land use". One holding is being cut in half, with the proposed easement ploughing through infrastructure such as cattle yards, silos and a shed which are positioned where they are for good reason, accessibility.

"Willingness of landholders to host permanent project infrastructure" is irrelevant in this case as EnergyCo has the power to compulsorily acquire easements, and is seemingly happy to use that power.

The mental health impact the negotiations and interactions with EnergyCo are having on both directly and indirectly affected landholders is immeasurable. Stress often leads to lack of sleep which can lead to mistakes being made and farming accidents occurring or possible road accidents. It also leads to frustration and possible out of character actions. EnergyCo is pushing landholders to their mental limits.

EnergyCo has been using the divide and conquer tactic so there is no support for affected landholders. There has often been pressure put on those impacted by the proposed route to sign non-disclosure

agreements rather than having an open and transparent negotiation with the property owners as a group. The NSW Government should be ashamed that this is how public authorities are treating its citizens and needs to adopt a more clear and equitable process for future projects.

Liability

Insurance is a big issue that is not covered, to my knowledge, in the EIS. Is the landholder liable if there is a machinery accident where transmission infrastructure is damaged? Is EnergyCo liable if there is damage to property caused by transmission infrastructure? Who is liable if there is a bushfire?

During construction is EnergyCo liable for any damage done to property, livestock and any accidents that may occur on local roads?

Allowance of power per home & CWO REZ capacity

EnergyCo states the CWO REZ will, at 3GW capacity, power 1.4 million homes, hence the need for the transmission line project. There are 17 projects proposed, under construction and operating within a 50 kilometre radius of Birriwa that, according to their advertising and websites, claim they will power a total of just over 3.87 million average homes. According to the 2021 census there are only 3.2 million homes in NSW so why the need for so many projects, let alone more REZ's in NSW? Is there a standard formula for calculating how much power an average home consumes, as each proponent has a different allowance, or is this just false advertising?

There is nearly 7GW of solar and wind proposed by candidate foundation generators in the same 50km radius. Given there is no maximum capacity for the CWO REZ will the capacity keep increasing until all of these projects are built?

Lack of Transparency

The NSW Network Infrastructure Strategy released in May 2023 states the 'deliver now' network arrangement would have 4.5GW capacity by 2027/2028 with new 500kV lines between the Merotherie Energy Hub and Wollar with 330kV extensions to Elong Elong, Uungula and Uarbry West & East. As a community we were always told the 'deliver now' arrangement was for 3GW, but have never seen maps where the lines between Merotherie and Elong Elong were only 330kV; they have always been mapped as 500kV. I was under the impression the decision had not been made to increase the CWO REZ capacity from 3GW to 4.5GW, due to the fact we had the opportunity to comment on the draft declaration amendment from the date of media release, 7th August 2023 to 4th September 2023, and the uprate from 330kV to 500kV lines between Merotherie and Elong Elong is in the 'secure now' arrangement. It seems plans, at least since May 2023, have been centred around 4.5GW capacity. This deception is typical of the way EnergyCo has conducted itself throughout the 'consultation' period thus far, which is not only wrong but disgusting!

It should also be noted that Mike Young, EnergyCo Executive Director, Planning and Communities was not available for around 6 months in early to mid 2023 and his replacement did not return phone calls. It has been very difficult to get any information.

There is also the fact that Technical Paper 2. Agriculture was prepared by Tremain Ivey Advisory. Richard Ivey, partner in the aforementioned consultancy business is also Deputy Mayor of Dubbo Regional Council.

The communities and local councils involved in dealing with EnergyCo have been drip fed information as EnergyCo sees fit. It is impossible to see the big picture when you only have a portion of the applicable information.

What's next?

The 'secure now' arrangement also involves a possible line to the south from Uungula toward Burrendong, and the 'plan for the future' entails a line from Merotherie toward the Gilgandra/Tooraweenah area and/or from Wollar to a new hub at Stubbo. I request these routes and other pertinent information on the proposed routes of these lines be made publicly available as it is relevant to how the CWO REZ wide community may feel about the current proposal. There are

proponents making themselves known in the Tooraweenah and Mendooran areas so do they have information the general public isn't privy to?

Inaccuracies & Omitted Reports

In this submission I have used the name Merotherie as that is how it is stated in the documents but I have raised on numerous occasions with EnergyCo staff that it is not the appropriate name for the energy hub in the Birriwa area. While the energy hub is located in the Merotherie locality this name has been causing issues for the family who own the property "Merotherie". I request the name of this infrastructure site be changed. I note the Elong Elong Energy Hub is a long way from the village itself, yet it was still named as such.

In Technical Paper 13, Traffic and Transport, it is stated that the Merotherie main camp site would house up to 1000 workers and the Neeley's Lane satellite camp would house up to 800 workers. The main EIS document, and others, state it would be 1200 workers housed at Merotherie and 600 at Neeley's Lane.

Page xi of Technical Paper 13 states construction is estimated to take about 3 years to complete. The EIS main document states construction is estimated to take about four years!

The following 28 documents are referenced in the EIS but are not available to view to my knowledge:-

1. Construction Environmental Management Plan
2. Aboriginal Cultural Heritage Management Plan
3. Historical Heritage Management Plan
4. Construction Noise and Vibration Management Plan
5. Soil and Water Management Plan
6. Social Impact Management Plan
7. Workforce Management Plan
8. Local Workforce Participation Strategy
9. Industry Participation Plan
10. Landowner Engagement Strategy
11. Pre-Construction and Construction Communications and Engagement Plan
12. First Nations Liaison Group
13. Complaints Management System
14. Operational Communications Plan
15. Property Management Plan
16. Community Wellbeing Strategy
17. Bushfire and Emergency Management and Evacuation Plan
18. Landscape Character and Visual Impact Management Plan
19. Biosecurity Management Plan
20. Vegetation Management Plan
21. Riparian Vegetation Management Plan
22. Operational Emergency Management Plan
23. Operational Environmental Management Plan
24. Traffic Management Plan
25. Vehicle Movement Plan
26. Driver Fatigue Management Plan
27. Construction Waste Management Plan
28. Biodiversity Management Plan

These inaccuracies and omissions throughout the EIS only highlight the haste to prepare this document to get planning approval and the disregard for the communities who are left to live with the cumulative impacts of all of the renewable energy developments in the area. It is impossible for concerned members of the public to make comment on documents that are not provided.

The EIS documents total 7910 pages, complete with pages of repetition that can only be to confuse and overwhelm the general public. The 'experts' who wrote these documents had months, if not years, to compile all of this information but the communities it affects, who are certainly not experts, were only originally given 28 days, later 42 days, to read and respond to this drivel.

Time invested

I, like many others, did not get the chance to read the EIS in its entirety. Every time I went through the document to find my reference points, I found more things I wanted to mention which just goes to show, firstly, the community was not given enough time, secondly, how incomplete, overwhelming and frustrating this document is, and thirdly, I have no doubt there are issues I have not had the chance to comment on. I have spent more than 150 hours in the last 6 weeks researching EnergyCo documents, wind and solar proponents' documents, attending drop in and pop up sessions run by EnergyCo and writing this submission. Are those of us who comment just being used as a free editing service?

The NSW Planning Portal is in need of a major upgrade if it is to be used so often. Countless hours have been spent trying to upload submissions during peak periods when it usually crashes.

As a farmer, and therefore small business owner, it has taken its toll both financially and mentally, but I think this is too important to let the, possibly only, chance the communities most affected will have to comment on this project pass by. In my opinion the NSW Government has not adequately equipped rural and regional NSW to handle the roll out of the renewable energy zones, but maybe that was always the plan!

Conclusion

It is stated on page lxi of the EIS main report that an 'amendment report' or 'preferred infrastructure report' may be prepared if required, and submitted to the DPE alongside the Response to Submissions Report. Any changes to the proposed transmission line route could have major impacts on landholders (for example: loss of vegetation for shade and shelter, loss of watering points, impact on farm infrastructure) and therefore I would like to request that such reports be placed on public exhibition/re-exhibition for the wider community to comment on.

There should be a moratorium placed over all works and planning processes concerning "renewable energy" until there are more investigations in to the undergrounding of power lines, possible health implications from transmission lines (EMR/EMF), wind turbines (shadow flicker, noise and bisphenol A) and solar panels (toxic material leakage from aged or damaged panels). The fossil fuels used to manufacture all the framework required, and the diesel burnt to transport and construct all of the infrastructure for these large scale projects, makes so called 'green energy' seem more like brown energy!

Generating power where it is needed would negate the need for hundreds of kilometres of transmission lines. Why can there not be money spent on incentives to have solar panels on rooves and batteries to store power at every home in metropolitan Australia? Why does rural and regional NSW have to bear the responsibility of producing power for the whole state? Why are we not questioning CSIRO's Gencost report and looking into other alternatives like nuclear? Projects like Snowy Hydro 2.0, and its cost blowout from \$2billion to \$12billion and lack of transparency regarding the problems it has, and continues to face, are not instilling much confidence in the transition to renewable energy.

The CWO REZ transmission project has the potential to cause irreparable damage to farmers, local communities, the region, the state and Australia, not just through the current proposed lines, but future lines combined with the cumulative effects of numerous large scale industrial wind and solar installations being proposed to connect to aforementioned lines.

Emma Bowman

Dubbo Firming Power Station

Dubbo Firming Power Station IPCN Submission (sent via email to IPCn – 24th April 2024)

I am a fifth generation farmer from Dunedoo, NSW. Whilst I live approximately 100 kilometres from the proposed Dubbo Firming Power Station I have grave concerns regarding the whole “rapid transition to renewable energy”, without which a gas powered firming station would be unnecessary. The impacts of the transition on agriculture (and therefore food security), hazard risk, traffic and transport, water, noise and visual amenity and all the foundations of rural and regional communities and landscapes is being put at risk in the name of saving the environment from climate change. Is there any sense in destroying the environment in an attempt to save it?

The people of rural and regional NSW, and Australia, who are being forced to host the vast majority of infrastructure needed to transition OUR country to renewable energy, are not being given opportunities to have their opinions and concerns heard early enough in the planning stages. There is plenty of room for real, valuable and constructive collaboration with community, but that option is being taken away through secretive, manipulative, divisive conduct from Government and developer employees.

Project Need

The project is lacking evidence and supporting research that suggests new gas-powered firming plants are more efficient than a modern coal-fired power station or a small nuclear power plant. Has this research been completed? Was it done without the Net Zero 2050 blinkers in place?

"with a view to transitioning to 100% hydrogen and biofuel systems. The Project will produce hydrogen when there is excess electricity in the grid" - The EIS does not contain sufficient planning to warrant acceptance of this "proposed transition", in fact, the EIS states on page 17 "Note: Reciprocating engines for the power station as contemplated in the Project's Scoping Report are least preferred following concept studies and technology vendor engagement and are not assessed in the EIS. These engines did not offer the ability to transition to the targeted hydrogen blends or offer biofuel compatibility in the short term."

Hazard Risks

The project is located on designated bushfire prone land. Was the local Rural Fire Service (RFS) brigade contacted for comment on the proposed project? Will all construction and operational staff be trained in fire fighting and become volunteer RFS fire fighters?

With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for the obvious reasons of there being less damage done. An average call out for RFS members would see half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 20,000L is not enough water to adequately fight even the smallest of fires in rural NSW. What is the

average amount of water used at an industrial fire?

The DPHI Assessment report states that “the site is surrounded by existing industrial operations, such as Hanson’s Dubbo Concrete Batching Plant, Fletcher International Exports, Dubbo Livestock Markets and the Dubbo Sewage Treatment Plant.” How will the safety of the thousands of livestock contained within the Dubbo Livestock Markets and Fletcher International Exports paddocks and yards be guaranteed in the event of a fire or other hazardous situation? Where would the liability be placed if there were an incident killing

livestock? The producer, processor, or owner of the business?

I would like to note the absence of agency advice from Fire and Rescue NSW on the Major Projects Portal. I believe an incident at an industrial complex like a firming station would more likely involve Fire and Rescue as the primary agency rather than the NSW RFS. Has Fire and Rescue NSW been contacted for comment on this proposal?

“The Department is satisfied that the project could be designed to ensure no unacceptable risk to surrounding land users from fires, explosions or toxic exposures.” What risks are deemed acceptable?

And who gets to make that assumption – the local community; those who will be living closest to the plant and facing the aforementioned risks? Or is it the Department staff, who will likely never set foot near such a development once operational?

Accommodation & Social Impacts

It is noted that “the project would increase the demand for accommodation, particularly for short-term accommodation during the construction period.” The use of short term accommodation by construction workers would, no doubt, please the accommodation providers, but what does that mean for other businesses that rely on tourism, or patients and families who must travel to Dubbo for medical reasons? The Central West has many tourist attractions and small businesses that benefit from travellers stopping in the towns and cities – they simply will not stop in our towns if there is no accommodation available. Dubbo Base Hospital services most of Western NSW, and often travel for a medical situation is last minute – how can there be guaranteed accommodation for these purposes?

It is expected that some portion of the construction workforce may travel from further afield, but the Department suggests that the impacts on local services are likely to be minor. People in regional NSW are already waiting weeks, if not months, to visit a GP. The increase in population, from not only the Dubbo Firming Power Station construction, will inevitably put pressure on all local services – police, ambulance etc. There needs to be much more emphasis placed on the cumulative impacts of the CWO REZ!

The Assessment Report states that “given the project would be situated in an industrial area and traffic and amenity impacts would be minor, the Department considers that adverse social impacts would be minor and would be largely offset by contributions to Dubbo Council under the VPA.” What constitutes as more than a “minor impact”? It seems to me that all impacts are classified by the Department as “minor”, or “negligible”, yet I, and many others, believe them to be major. To assume impacts would be “offset by contributions” is DISGUSTING!! Throwing money at issues should not be used as an adequate mitigation measure. There are communities, and individuals, facing major upheaval due to all of the proposed renewable energy infrastructure projects, including the Dubbo Firming Power Station, so if there is a need to BUY SUPPORT renewable energy project developers should be FORCED TO share funds to every impacted person/business ie. those whose properties are split by a transport route, those who will be impacted by road upgrades and traffic increases, those who have children on the school bus – lets call it danger pay. I do not believe you will find any individual in the Central West, and much further afield who will not be adversely affected by the construction, and operation period of all renewable energy projects – adequately compensating every individual is impossible!

Community consultation

There is no evidence of sufficient community consultation in the EIS. While Squadron list stakeholders and state the community information sessions were held, nowhere does it state the number of community members who participated. If community members didn't know these sessions were on, how could they possibly attend? Evidence needs to be shown that adequate community participation and awareness was reached, not merely that they were “held”. The project documentation, total number of DPHI submissions, and Dubbo Regional Councils’ comment in their IPC submission all indicate that there is substantial lack of community awareness and participation around this project. This is a concern for any development, but particularly this type of State Significant Development and one located so close to the city of Dubbo.

Dubbo Regional Council states in its letter to the IPC, that “Council has not received any feedback from the community in relation to this project.” The IPC could, potentially, take this as an indicator that majority of the community had no knowledge of the proposal. There is no sufficient evidence to demonstrate 1. Awareness and knowledge of the project 2. Support and 3. Objections. Can Council evidence where they have proactively invited and received community participation in the consideration of this project?

How was the community of Dubbo and surrounding districts involved in the site selection for this project?

1. the EIS states that Dubbo was "selected" as the most appropriate location due to a number of factors relating to the CWO REZ.

2. the EIS also states that the actual parcel of land was identified primarily due to the zoning and an interested landowner.

These crucial decisions are made WITH NO community consultation or involvement, what then follows is a model of self-professed "community consultation" endeavours, whereby no-one's true and genuine knowledge, opinion or view on the project is actually sought and utilised to contribute to planning decisions that would otherwise create a real "collaborative" project with real social licence. The notion that there was legitimate community consultation is in my opinion, only perceived.

Traffic & Transport

"The Department considers impacts to the road network would be minor and traffic impacts can be managed". Transport and traffic will be a major issue when considering the cumulative impacts of all projects proposed for NSW. A large proportion of construction materials for the "rapid transition to renewable energy" will be transported from the Port of Newcastle to rural and regional NSW requiring the use of the Golden Highway. This route is a major freight route from all of Western NSW to the Port of Newcastle. There will need to be major upgrades to this route PRIOR TO any project construction. If commodities cannot get from rural NSW to Port that will cost the agricultural industry dearly. There is also the possibility of causing more road accidents due to impatient and frustrated drivers being stuck behind oversize overmass vehicles. How will the enormous impacts on local roads and major transport routes be mitigated to the satisfaction of the local community, and greater rural and regional NSW – the people that will live with the aforementioned impacts EVERY DAY? The ramifications will be much greater on those who live in the area, and on the transport route, than the experts assessing and modelling these impacts suspect, or will have to live with. How will those who own a property split by any of these transport routes safely move livestock across these roads? How will school buses safely traverse these routes twice a day? Will something only be done once an accident occurs or will measures be taken to prevent any accidents? Whilst it could be argued that the Dubbo Firming Power Station will only contribute a small proportion of the proposed traffic movements, compared to the greater CWO REZ, and the state projects as a whole, without the "rapid transition to renewable energy" and the number of proposed solar, wind and hydro projects the firming station would become redundant. What would constitute a major traffic impact to the Department? Would Transport for NSW have raised concerns about the potential impacts on road and intersections if the "rapid transition to renewable

energy" was a private developer initiative rather than Government led?

Conclusion

Dubbo Firming Nominees Pty Ltd is a wholly owned subsidiary of Squadron Energy. Squadron Energy has multiple renewable energy generation projects proposed in NSW, and Australia, and stands to profit extensively from the "rapid transition to renewable energy" through both electricity supply and the Australian Governments Renewable Energy Target (RET) Scheme. What transparent process and governance structures did this project follow, to enable Squadron Energy to be the successful proponent of this crucial piece of infrastructure in the CWO REZ?

Emma Bowman

Dunedoo NSW

Lawson Park Road Solar



Emma Bowman
Objection to DA
To:

Sent - tin...outlook.com 23 September 2023 at 9:09 AM

To whom it may concern,

I would like to object to DA29/2023, use of land for solar farm at 126 Lawson Park Road, Dunedoo. Solar installations are unsightly and this one will be viewed from a lot of points around the area causing glare and ruining our scenic views. The run off from the solar panels will affect water courses that flow into the Talbragar River, not only causing erosion but polluting the river system. Using valuable agricultural land for power generation is wrong!

Regards,
Emma Bowman

Lawson Park Road Solar (sent to WSC via email 18th April 2024)

As a landowner with a view from my primary residence, and property of the proposed 5mW solar installation proposed for 126 Lawson Park Road, Dunedoo (Lot 78, DP 754309) I would like to respond to the Warrumbungle Shire Council Assessment Report, and other Assessment Reports completed by consultants. I object to the proposed project for a multitude of reasons.

The property description is incorrect, misleading and upsetting for other landowners in the district. "Talbragar Park" is the name of a property located East of Dunedoo on the Golden Highway, on the Southern side of the Talbragar River to the proposed Lawson Park Road solar project. Although the damage has already been done it would be appreciated if the property description was amended to accurately represent where the development is being proposed.

I would like it noted that DA 19/2023 was placed on public exhibition by Warrumbungle Shire Council from 13th September 2023 to 5th October 2023; a time when our community was under a large amount of pressure due to other project documents. During the last five months of 2023 there was only four weeks in which there was not a Central West Orana Renewable Energy Zone (CWO REZ) State Significant Development (SSD) or Critical State Significant Infrastructure (CSSI) project Environmental Impact Statement (EIS) or Amendment Report on exhibition rendering local community members exhausted, frustrated and overwhelmed. It is my belief that this is the reason for the lack of submissions from community members regarding the Lawson Park Road solar proposal. I request that submissions be opened to members of the public for a further four week period to gain a better understanding of community feelings about this specific proposal?

Visual impacts

With regard to the visual and glare impacts the planner commented "the assessments demonstrate the proposal will have minimal impacts". I doubt the residents of the closest home to the project, less than 250m from the house to the closest proposed solar panels, and overlooking the whole project (the house is elevated – 15m higher than where the panels are to be installed), would consider the impact to their visual amenity 'minimal'. Is it acceptable that a contract planner, who does not reside in the area visually affected by the proposal, suggest the visual effects are minimal? Is it adequate that guidelines, written by those who do not live rurally, deem what visual impacts are classed as minimal, or significant? Why are visual assessments only carried out from residences? As farmers, we spend a large proportion of our time in the paddocks – is it too much to ask for some recognition for the visual amenity from our whole property?

The planner also stated that "at the onsite meeting it was discussed that additional trees be planted for added screening for R2 and R3. Condition of Consent to be conditioned to ensure that adequate screening is established and maintained for the life of the development." Trees suited to the Dunedoo District and farmland are generally slow growing so will any screening trees be planted and established (ie. fully grown) PRIOR TO construction of the proposed solar project? If this is not the case, any trees planted for screening will not be useful until the end of the developments' life rendering the condition

of consent useless. Will the applicant be responsible for planting, maintaining and replacing, if necessary, aforementioned screening trees? Is there an alternative visual mitigation measure to screening trees if the affected landowners do not agree to tree planting?

Noise & Vibration impacts

It is suggested in the Noise and Vibration Impact Assessment that to minimise the potential impacts for construction noise could include:-

- operating plant in a quiet and efficient manner

How is it possible to operate a post rammer 'quietly'? Have any of the assessors frequently operated the kind of machinery needed to construct a solar project? None of this equipment can effectively do its job without noise.

It is also "recommended that during any work generating high noise levels that have impulsive, intermittent, low frequency or tonal characteristics, consultation with sensitive receptors occurs regularly." This 'consultation' should be had PRIOR TO any possible approval, and consent should not be granted unless an agreement can be reached with the neighbouring landowners.

Whilst the predicted receptor noise levels for operation of the Lawson Park Road project comply with the intrusive noise criteria I do not believe 'compliance' is an adequate measure of the impact on sensitive receivers, or the greater community. Living rurally mostly equates to a peaceful environment in which it is possible to hear any unnatural noises. Will a Lawson Park Road solar forever change the serenity of the local area?

Hydrologic & Hydraulic impacts

It appears that all assessment of the potential hydrologic and hydraulic impacts are based upon modelling and data. All the potential flood impacts need to be ground truthed PRIOR TO any approval.

Traffic impacts

According to Warrumbungle Shire Council internal referrals the Technical Services representative is "pleased to inform you that the council has authorized the utilization of the "All Weather Road" for heavy vehicle access, irrespective of loading conditions." To my knowledge, Council has made this decision without consulting the local community, or landowners along the proposed transport route. The intersection between the Castlereagh Highway and All Weather Road is very dangerous, especially for heavy vehicles. This should be investigated and rectified PRIOR TO any approval.

There are conflicting reports regarding the number of vehicles generated during construction. Regardless of the actual numbers the number of staff and deliveries required will mean an enormous increase in traffic for the local area, especially those who frequently walk livestock across the transport route to access feed and water.

The Construction Traffic Management Plan (CTMP) should be made available for local community members to view and comment on PRIOR TO approval, if the project is not rejected.

It is suggested that "the increase in traffic during construction, which is equivalent to one vehicle every 10 minutes, is expected to have a negligible impact to the traffic conditions". Again, negligible for whom? The farmer who is trying to safely traverse the transport route with their livestock? The young family attempting to get to town? The school bus?

It is also stated that "the road network is able to readily accommodate the traffic volumes and is expected to continue to operate with a good level of service during the construction and operational periods". My property is divided by the double Golden/Castlereagh Highway, along the proposed transport route, which is constantly getting busier. It is already an onerous task to stop traffic when crossing livestock, so whilst the highway may be able to 'accommodate' the extra traffic from Lawson Park Road solar it will have impacts on landowners right along the route. How will these impacts be mitigated?

The Traffic Impact Assessment was compiled using Digilah Road as the access route from Port Botany therefore no in depth assessment has been completed for the newly proposed access route using the All Weather Road. I believe this needs to be completed PRIOR TO any potential approval.

Agricultural impacts

The planner stated in his comments that the “subject land is within the Renewable Energy Zone and will be returned to agricultural land at the end of the developments lifespan.” There was not adequate community consultation regarding the declaration of the CWO REZ therefore, in my opinion, being within the boundary of the REZ is not a good enough reason for a project approval.

He also stated “only a small part of the subject land is mapped as Biophysical Strategic Agricultural Land”. BSAL **should not** be used for electricity generation works AT ANY TIME regardless of how small the area is. BSAL is the most productive agricultural land in the country and should not be taken out of production, even temporarily.

Another comment made in the assessment report is “the proposal will have no direct or indirect impacts on the agricultural use of adjoining land and is therefore considered an appropriate use of the land.”

Insurance implications to landowners being forced to neighbour solar projects is becoming a major issue within rural NSW, and Australia. To my knowledge this issue not been adequately addressed, and until such a time as it is there should not be any projects approved or constructed. At no time should construction or operation of the project impact on adjoining landowners – what is the process for a neighbouring landowner if they feel their property is being impacted?

Bushfire Risk

The “subject land is mapped as bushfire prone land”. Every year there are grass fires in the Dunedoo district, some only minor but it is only seven years since the Sir Ivan Bushfire ravaged over 50,000ha in the area in under three days. Bushfire risk should be taken very seriously with regard to solar installations, especially those with a BESS involved, considering the major limitations to fire fighting (ie. fire fighters not being able to enter the site).

I request the Bushfire Emergency Management and Operations Plan be made available to the local community, or at the very least the nearest Rural Fire Service (RFS) Brigade, PRIOR TO any consent to ensure the applicant will be able to protect the project site and surrounding properties in the event of a bushfire. Responsibility for protecting the proposed solar project and surrounding properties should not fall to the RFS volunteers or Fire and Rescue crew. All construction, and operational staff should be trained in fire fighting and have adequate equipment to protect the site from a grass or bushfire. They should also be volunteering to help the greater community during a fire.

Cumulative impacts

When considering the suitability of the site for the development the following question and answer are given. “Does the proposal fit the locality? Yes, the subject land is within the Renewable Energy Zone and it is considered that the proposal will have a minimal impact on the locality.” There are over fifty renewable energy infrastructure projects operating, under construction and in various stages of planning proposed for the CWO REZ. Although it is expected that construction will begin on this project prior to other REZ developments the increased traffic on both major transport routes and local roads will impact the local community.

This project may only be small but that should not detract from the impacts it will have on agriculture, surrounding landowners and the local community.

Other impacts

The planner commented that “the potential impact on property values is also not a relevant planning matter”. Property value is very important to landowners, and the unknown impacts on neighbouring properties is not acceptable, and very relevant to the potential approval of the Lawson Park Road solar installation. The project should not impact neighbouring properties IN ANY WAY.

Warrumbungle Shire Council Environmental Compliance Officer has highlighted the fact that the proposed site is “identified as groundwater vulnerable” and “salinity prone” in accordance with Council’s GIS mapping”. Should there be more investigation into both of these issues so as not to cause unintended impacts on the local area?

It is stated that the workforce is likely to be housed in Dunedoo and Dubbo. Whilst I can only assume there would be some vacancies in Dubbo, being a regional centre, accommodation is very short in Dunedoo, even prior to any other REZ related projects beginning construction. A detailed plan needs to be provided to the public pre consent detailing accommodation plans for staff.

I have not seen any information made available regarding the amount of water or where water will be sourced for construction and operation of the proposed project. This information MUST BE made publicly available PRIOR TO consent.

Plans & Policies

Warrumbungle Local Environmental Plan

Clause 1.2 Aims of the Plan

(2) The particular aims of this plan are as follows –

(c) to encourage the retention of productive rural land for agriculture

I do not believe taking valuable agricultural land, especially that classified as BSAL, even if it is deemed temporarily, aligns with the above aim. For Australia to continue to feed its growing population farmers are going to need every available hectare of land. We are already running more intense operations than last century to keep our businesses viable and feed the ever expanding nation.

State Environmental Planning Policy

The assessment report states the following:

“State Environmental Planning Policy (Planning Systems) 2021: Chapter 2

Comment: Chapter 2 of this SEPP relates to State and regionally significant development. The proposed development does not meet the triggers in the SEPP for State or regionally significant development. The proposal is therefore local development and this SEPP does not apply.”

“State Environmental Planning Policy (Transport and Infrastructure) 2021: Chapter 2

Comment: Clause 2.36 of the SEPP provides for electricity generating works of the kind proposed to be permitted with consent in a prescribed non-residential zone, including the RU1 Primary Production zone. The subject land is zoned RU1.

Clause 2.42 applies to development of solar farms in a regional city for State significant or regionally significant development. The subject land is not in a defined regional city and is not State significant or regionally significant development.”

Yet when considering the Warrumbungle LEP 2013 it states:

“Land Use Table

Comment on permissibility of use: The use of the land for electricity generating works is prohibited in the RU1 Primary Production zone. However, electricity generating works may be carried out within a prescribed rural, industrial or special use zone under clause 2.36(1) (b) of the *State Environmental Planning Policy (Transport and Infrastructure) 2021*. RU1 Primary Production land is a prescribed rural zone.”

It seems that policies are being utilised when they give the desired outcome. Some clarification around which policies should be followed would be appreciated.

Conclusion

The assessment report conclusion states that “conditions have been imposed to ensure that such impacts are adequately mitigated and appropriately managed during the operation of the of the development”. Firstly, I ask, what about the construction impacts? Secondly, what is considered ‘adequate mitigation’, and was every local landowner affected by the development (impacted by traffic increases, visual and noise issues etc) asked for their opinion on adequacy? Lastly, what is considered ‘appropriate management’, and, again, were the affected landowners properly consulted?

Throughout the whole assessment report the words minimal, negligible and insignificant are used repeatedly when describing the potential impacts of the proposed Lawson Park Road solar project. Looking from an outsiders perspective, not having to live with the consequences, and adhering to the appropriate guidelines through modelling and estimates does not adequately reflect the impacts on neighbouring landowners and local communities. All renewable energy projects are causing divisions in once cohesive communities, sometimes through developer manipulation and lies, other times through unintended impacts on other local landowners.

I urge those with consent authority and determination power over the Lawson Park Road solar project to consider the impacts this proposal, and the numerous others within the district, will have on the local

community, the larger region, agriculture and all the other associated effects I have listed above, and reject the development application.

Emma Bowman

Liverpool Range Wind

MOD 1 - Turbine and infrastructure changes	SUB-49248961	12/10/2022	No	Object
Attachments				
Comment / Message				
<p>I am a landholder east of Dunedoo on the Golden Highway. I object to the proposed Liverpool Range Wind Farm for a few main reasons. Firstly, power should be generated where it's being used. Why does our landscape need to be polluted by turbines and power lines when we don't get to use any of the produced power? Not to mention the huge loss of generated power by the time it reaches its destination; what a waste!! There are a lot of people that will be affected by the installation of these monstrosities and not see any benefits.</p> <p>Secondly, the issue of getting the turbines to where they are to be installed. Regional roads are already in a huge state of disrepair, what time and money that would be put into upgrading roads to accomodate moving the turbines around should be used to fix the already deteriorating road network.</p> <p>And lastly, how would firefighting be carried out once the turbines and power lines are in place? It's not that many years since the Sir Ivan Fire in which a number of aircraft were used to assist the ground crews. I can't imagine the RFS sending planes/helicopters into an area with so much risk.</p> <p>I'm not sure who came up with the whole Renewable Energy Zone but I assume it was someone sitting in an office somewhere who has never set foot in the Central West! Interrupting prime agricultural land will have a long lasting and devastating effect on Australia's ability to feed itself. Not to mention the stress it places on small communities who rely on the whole population to stay viable; this is the sort of stuff that tears families and communities apart. Imagine the uproar if it was proposed that wind turbines and a power line were installed on Bondi Beach.</p>				

OBJECTION to Liverpool Range Wind project (SSD-6696-Mod-1) (submitted via Major Projects Portal – 13th February 2024)

I object to the Liverpool Range Wind project Mod-1 Amendment – Temporary Workers Accommodation. Whilst I understand that Tilt is proposing this temporary worker accommodation facility in response to community and council concerns I do not support any part of the Liverpool Range Wind project so cannot support the current amendment. I am fed up with providing suggestions to improve projects that are not heeded by developers so listed below are my issues with the proposal on exhibition.

- The absence of any Management Plans listed in the Amendment Report including but not limited to Environmental Management Plan (EMP), Waste Management Plan (WMP), Traffic Management Plan (TMP), Bushfire Emergency Management Plan (BEMP). The community does not have adequate information without these plans being provided in full. When will they be made publicly available for comment?
- “Detailed design” must not be approved prior to the public being given a chance to comment - especially for internal access roads, firefighting water supply volume, water management, erosion and sediment controls, wastewater management, accommodation requirements, project timing, utility estimates, traffic impacts on local roads, layout for the facility, licences and permits and construction scheduling.
- Where will the workforce required for TWA construction be housed?
- How will neighbours have their concerns addressed? What is the distance within which concerned neighbours will have their impacts considered and/or mitigated?
- Appendix K – Visual Impact Assessment states that “if required upon fieldwork ground truthing, there is opportunity to incorporate screen planting to reduce the potential visual impact from the TWA”. Any screen planting should be planted 20 years prior to construction for any benefit to be seen by neighbouring residents. Who will plant and care for proposed plantings? Who will replace any dead plantings?
- How will current telecommunication services cater for the extra population? Any possible upgrades must be installed prior to any construction workers entering the area.
- “Tilt Renewables are also proposing a project-specific quarry to supply resources to construct the Project which is subject to a separate assessment and approval process.” Please outline the separate assessment and approval process and provide an update on its status?

- Will there be medical services on site at the TWA to address any worker illness or accident? Paramedics? Doctors? How will Tilt ensure no burden is placed on existing medical services in local communities – including emergency rooms at local hospitals?
- “Dedicated on site firefighting water supply, the volume to be determined during the detailed design phase. Provision of connection suitable for firefighting purposes located within the facility (65mm Storz).” Tilt needs to be self sufficient in the case of an emergency, not reliant on the existing emergency services including RFS or Fire & Rescue. During a bushfire where will the workers evacuate to? How will Tilt employees adequately defend the facility?
- Can Tilt Renewables guarantee no bore in the district will have its water level drop, or go dry, during construction and operation of the TWA facility? What will Tilt Renewables do for any landowner who does not have adequate stock and domestic water due to extra water use in the district?
- Will the Tilt workforce proposed to be housed in the TWA facility use existing community services and/or amenities eg swimming pool? If so, how will Tilt, or construction workers, reimburse the community considering these are funded and maintained through council rates?
- How many heavy vehicle loads will be required to transport the modular manufactured buildings to the site? And for decommissioning? What is the proposed transport route?

Due to time constraints and the overwhelming amount of reading, research and submissions required for everything related to the CWO REZ, renewable energy infrastructure and the “rapid transition to renewables” I have not adequately read the Amendment Report or any of the associated documents. This project has been a blight on the Coolah community, and the greater district, for nearly 10 years. The number of exhibition periods for this project alone, where locals and other concerned community members use their valuable, volunteer time in an attempt to mitigate impacts, has been onerous and very frustrating. I have personally given Tilt numerous suggestions that don’t seem to be included in the Amendment Report.

Emma Bowman

Sandy Creek Solar

Objection to Sandy Creek Solar Farm (SSD-41287735) (submitted via Major Projects Portal – 25th June 2024)

I whole heartedly object to the Sandy Creek Solar project.

I am a fifth generation farmer in the tightly held, “safe” Dunedoo district; my family has been farming in the area for over 200 years. My partner and I, with help and support from my retired but still very active parents, produce beef, lamb, wool and grain on part of my family’s original land. Whilst some of the farming land in the 20,000 square kilometre Central West Orana Renewable Energy Zone is not considered valuable, it all plays its part in producing the food and fibre Australia relies so heavily on. To see this land scarred by transmission lines and covered in wind turbines and solar panels will destroy our picturesque region, its small, rural communities, and decimate the agriculture sector in our magnificent country.

Although we, personally, are not currently being forced to directly neighbour renewable energy infrastructure projects, we will be adversely impacted by the increased traffic on the Golden Highway (a major transport route for the CWO REZ), which runs through the middle of our property, impacts on the Talbragar River system and underground aquifers, loss of visual amenity, increased bushfire risk and fire fighting restrictions, potential insurance premium increases and loss of community cohesion.

Legislation & CWO REZ Declaration

The Electricity Infrastructure Investment Act 2020 was passed through the NSW Parliament, during the height of Covid 19. One of the objects of the Act is “to foster local community support for investment in new generation, storage, network and related infrastructure”. The Act also states that “a person or body exercising a function under this Act must do so in a way that is consistent with the objects of this Act.” I

do not believe any renewable energy developer or government authority has fostered local community support within the CWO REZ.

The Act also states that “the Minister may make a declaration” of a renewable energy zone “only if the Minister has considered the following” – “the views of the local community in the renewable energy zone”.

Lightsource BP’s Sandy Creek Solar project is one of over fifty projects operating, under construction and proposed within the CWO REZ boundary at this point; it is certain there are more projects early in the planning stages and developers continue to prospect for more potential land hosts. The CWO REZ declaration came as a shock to the vast majority of its inhabitants. Not unlike specific projects being proposed by developers now, community engagement regarding the REZ was lacklustre, or even non-existent. Below are answers given to supplementary questions at the 2024 Budget Estimates hearings in the NSW Parliament evidencing the lack of community knowledge about the CWO REZ prior to its declaration.

(a)	In accordance with the Minister’s statutory obligations under section 20(e) of the <i>Electricity Infrastructure Investment Act 2020</i> , the Central-West Orana Renewable Energy Zone (REZ) draft declaration was exhibited on the former Department of Planning, Industry and Environment’s website for public consultation for 28 days from 17 September 2021 to 15 October 2021.
(b)	Six submissions were received from stakeholders during the draft consultation period. All submissions were in support of the exhibited draft (three from renewable energy developers, two from public authorities, and one from an organisation). No submissions were received from members of the general public, and no objections were received from any stakeholders.
(c)	Submissions were provided on the grounds that they would be confidential. Submissions will not be published.
(d)	Consistent with the Minister for Energy’s statutory obligations under section 19(4)(b)(iii) of the <i>Electricity Infrastructure Investment Act 2020</i> , the declaration was made in consideration of the views of the local community in the REZ. This included through landowner meetings, direct engagement with local councils, mailouts, and establishment of a Central-West Orana REZ Regional Reference Group with local community representatives. The proposed scale and scope of the Central-West Orana REZ identified in the declaration had been publicly available since the NSW Government’s submission on AEMO’s Integrated System Plan in March 2018.
(e)	The former Department of Planning, Industry and Environment advised the Minister at the time that the declaration could be made consistent with statutory obligations under the <i>Electricity Infrastructure Investment Act 2020</i> , including that views of the local community in the REZ had been considered and that the draft had been published for 28 days on the Department’s website.

Social license

According to the Parliament of Australia “social license to operate has been defined as an ongoing acceptance of a project by the community and other important stakeholders.” How is social license measured by DPHI? Does a certain number or percentage of objections to a project EIS suggest social license has not been achieved, therefore rendering said project unapprovable?

The below is an excerpt from the EnergyCo September 2022 project update. It states that an initiative under development by EnergyCo across the REZ’s is “draft guidelines on orders prohibiting connection to the REZ network where community support has not been established”.

Working with the community

EnergyCo is proactively investigating how we can manage cumulative impacts during the construction and operation of the REZ, as well as provide lasting benefits to the local communities which will host renewable energy infrastructure.

Initiatives under development by EnergyCo across the REZs include:

- NSW transmission guidelines which would provide a robust framework for the planning and development of new transmission infrastructure and provide certainty for landowners, communities and project proponents
- Draft guidelines on orders prohibiting connection to the REZ network where community support hasn't been established
- A regional energy strategy outlining community energy schemes and other initiatives
- Guidelines to ensure First Nations people are engaged and benefit from the REZ
- Opportunities to bring forward the delivery of community benefit sharing initiatives in advance of access fees being collected from generators.

In addition, EnergyCo is carrying out a range of studies which will inform how we coordinate impacts within the Central-West Orana REZ. We are seeking input from local councils, key stakeholders and subject matter experts to ensure the studies result in meaningful outcomes and recommendations. The findings will inform how we deliver workforce accommodation, road upgrades, workforce training, improved mobile connectivity and other key programs and initiatives. The studies are expected to be completed in late 2022 with the aim of coordinating project activities in the REZ to minimise cumulative impacts. We will notify the community once they are available to view.

EIS Appendix R page & statement	Response/Concern
Page 66 Table 5.3 Most landholders stated they did not support the Sandy Creek Solar Farm, primarily based on direct impacts including local amenity (ie visual) and land-use	Indicates the general feeling of people in the district toward the Sandy Creek Solar project – distinct lack of social license!

Community Engagement

EIS Appendix R page & statement	Response/Concern
Page 82 Stakeholder participation in decision-making systems refers to the right of those who are affected by a decision to be involved in the decision-making process, and that decision-making processes actively identify and seek input from affected stakeholders (IAP2, 2015).	<p>Table 5.3 Adjacent and nearby landowners – summary of engagement feedback states “some landowners expressed a desire for more meaningful and direct engagement with LSbp regarding their key concerns”.</p> <p>Table 5.6 Local community SIA engagement outcomes – summary states “concerns about lack of meaningful community engagement and feeling unheard”.</p> <p>The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised.</p> <p>The Community Impact Survey, conducted by Property Rights Australia and NREN, collecting 775 responses between Saturday 12th April and Friday 10th May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and</p>

	transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity. The results from these two consultations highlight the major issues within the renewable energy sector regarding community engagement!
Page 83 LSbp will continue to engage stakeholders through EIS exhibition and subsequent phases of the assessment, including ongoing negotiations and consultation with local Council, neighbouring landowners, and First Nations stakeholders.	I am not aware of any community engagement events open to the general public by Lightsource BP throughout the EIS exhibition period (May to 25 th June 2024

Agriculture

EIS Main report page & statement	Response/Concern
Page ES.9 If fully removed from agricultural land use, the study area would account for 0.27% and 0.19% of the agricultural land in the Dubbo and Warrumbungle LGAs being removed, respectively, which is insignificant.	The Cambridge online dictionary defines insignificant as being “small or not noticeable, and therefore not considered important”. I do not believe significance is a quantifiable measure of impacts. I also do not believe considering fully removing any valuable agricultural land from production will not be noticed or important. These calculations do also not allow for the cumulative effect of the proposed removal of agricultural land within the CWO REZ and more specifically the Dubbo and Warrumbungle LGA’s. It is also worth noting the location of the cluster of projects currently operating, under construction and proposed, further condensing the impacts on specific agricultural areas – areas renowned for their production ability.
Page ES.9 Overall, potential Project impacts to soil resources and agricultural activity during construction and operation are considered minor and can be adequately managed through the implementation of mitigation measures.	Potential impacts to soil resources and agricultural activity will be high. Installing solar panels on the project site will mean the current agricultural uses, cattle grazing and cropping, will not be possible. How will Lightsource BP keep the soil healthy and productive during construction and operation? How will compaction issues be managed?
Page 154 BSAL is NSW’s most valuable farmland with high quality soil and water resources which render the land capable of sustaining high levels of agricultural productivity with minimal management practices (OEH 2013). There is a small area of mapped BSAL present in the central-southern section of the western portion of the study area, associated with the Mebul soil landscape (Figure 6.6).	No renewable energy infrastructure project should impact Biophysical Strategic Agricultural Land (BSAL) due to it being NSW’s most valuable farmland.

<p>Page 154 SSAL contains high quality soil and water resources. The mapping program will assist state and local governments to recognise and value agricultural land. The study area is almost entirely mapped as potential SSAL.</p>	<p>From the Department of Primary Industries website “Agriculture remains central to NSW’s food security and economic prosperity. However, the amount of rural land suitable for high levels of agricultural production in NSW is limited. Agricultural mapping therefore plays an important role in identifying and helping preserve this valuable resource.”</p> <p>Renewable energy infrastructure should not impact any potential State Significant Agricultural Land (SSAL).</p>
<p>Page 158 Once the Project reaches the end of its investment and operational life, Project infrastructure will be decommissioned and the study area returned to its pre-existing land use, namely suitable for grazing and cropping, or another land use as agreed by the Project owner and the landholder at that time. Therefore, the risk of permanently removing agricultural land or industries is negligible.</p>	<p>What is the definition of investment life?</p> <p>Returning the study area to its current use of grazing will take decades. Trees for livestock shade and shelter will take at least 20 years to mature for the desired use.</p> <p>With regard to land being used for cropping after a minimum of 40 years out of production, the inputs (fertiliser, tilling to release compaction etc) will be enormous to grow a worthwhile crop.</p>
<p>Page 158 If fully removed from agriculture for the life of the Project, the loss of study area agricultural land within Dubbo and Warrumbungle LGAs is insignificant relative to the stock of agricultural land in the region.</p>	<p>What is “the stock of the agricultural land”? Is this suggesting there is a reservoir of land available for agriculture yet to be brought into production?</p> <p>Does this account for the productivity of the land for the proposed project compared to other areas within the LGA’s?</p>
<p>Page 252 However, it is acknowledged within the Solar guidelines that: “cumulative risk to agricultural land and productivity because of large -scale solar development is very low. The Australian Energy Market Operator estimates that NSW will need approximately 20,000 MW of large-scale solar generation by 2050. This would require approximately 40,000 ha of land or only 0.06% of rural land in NSW. Even in the highly unlikely scenario that all of NSW’s solar generation were located on important agricultural land (this land covers around 13.8% of the state and is 6 to 7 times more agriculturally productive than the remaining 86.2% of the state) only 0.4% of this land would be required.”</p>	<p>The Department of Planning, Housing and Infrastructure has previously acknowledged that transforming land from its traditional use of agriculture to the industrial nature of a solar installation is a “loss” of agricultural land. However, the Department considers the amount of land lost to solar in the CWO REZ will result in a “negligible reduction in the overall productivity of the region.” Whilst there is 2 million hectares of land within the CWO REZ boundary and the loss of nearly 16,000ha to solar projects accounts for approximately 1% of agricultural land, when you condense the area to a 30km radius of Birriwa (where there are many projects currently proposed, under construction and operating) the loss of agricultural productivity is much more intense.</p> <p>30km radius of Birriwa = 282,700 hectares (including non agricultural land)</p> <p>Land lost to solar within 30km radius of Birriwa = nearly 11,000ha</p> <p>11,000ha out of 282,700ha = 3.9%</p>

	<p>The Department of Primary Industries Agriculture Industry Snapshot for Planning August 2020 states “the Central West Slopes and Plains has the advantage of large areas of unfragmented land that allow the achievement of economies of scale for broadacre agriculture including irrigation. This coupled with suitable soils and water supply, infrastructure as well as access to markets in Dubbo, Orange, Sydney, and Newcastle make the Sub Region one of the most successful and profitable in NSW.” The same document also says “future land use planning must recognise the importance of agriculture to society and the economy and that the land and resources on which agriculture depend need to be protected and managed to enable continued use of the land for agriculture” and, “land use planning needs to recognise that it is not only agricultural land with excellent biophysical characteristics that needs to be retained for agricultural purposes, but also those key secondary supporting industries which may be located on lower quality agricultural land which are still potentially impacted by encroaching non-agricultural land uses.”</p> <p>The same document declares there is a “need to protect land for its future productive capacity particularly where there is a combination of biophysical assets such as water, topography and soils. The Central West Slopes and Plains Sub Region supports high value agriculture now and will be important to sustain production of more specialised agricultural and horticultural enterprises into the future.”</p>
EIS Appendix K page & statement	Response/Concern
Page 32 The modelled LSC and inherent soil fertility indicate the area is consistently valuable agricultural land.	Valuable agricultural land is an important resource for producing food and fibre for Australians and should not be used for energy generation projects or Battery Energy Storage Systems.
<p>Page 41 It is estimated that the study area ran some 400–475 head of trade steers and 75 cows with calves at target stocking rates of 4 dry sheep equivalent per hectare (DSE/ha) rising to 16 DSE/ha on fallow crop and 2 DSE/ha on native pasture.</p> <p>Page 109 This productivity will be lost as the Project will result in the land being unavailable for the existing cropping and cattle grazing practices.</p>	<p>One 500kg (liveweight) steer will produce 2750 average daily red meat intakes (100g).</p> <p>The development footprint for Lightsource BP’s Sandy Creek Solar is 1,489ha. Whilst there are some exceptions, this amount of land within the Central West Orana Region is capable of producing enough red meat - beef, lamb and/or mutton, to feed 1,600 Australians per day, based on the 100g average daily red meat intake (when considering a mixed farming operation with self</p>

<p>This is a significant loss of agricultural land value based on annual productivity and an assumption of the entire study area being developed and unavailable for intensive agriculture such as cropping or cattle grazing.</p>	<p>replacing cattle and sheep flocks). That's 584,000 Australian red meat intakes in a year produced from the land potentially being lost to the Birriwa Solar project. The same land is capable of growing enough wool to produce 34,000 pure wool jumpers each year; imagine how many socks or wool blend garments that would be. Over the whole CWO REZ that's more than 6 million average Australian daily red meat intakes or 360,000 pure wool jumpers lost per year.</p>
<p>Page 110 The compatibility of the Project with adjacent land-uses based on zoning as primary production (e.g. agriculture, renewable energy farms) during operation and after decommissioning is expected to be good with the utilisation of mitigation measures in Section 8.</p>	<p>According to the NSW Government, "a primary producer is a person or incorporated body who cultivates or uses their own or someone else's land for their own benefit:</p> <ul style="list-style-type: none"> • for the production of fruit, grains, flowers, vegetables, tobacco or farm or agricultural produce of any description • for dairy farming, poultry or other bird farming, pig farming, bee keeping, or oyster or fish culture • for a nursery • as a pastoralist for the rearing or grazing of horses, cattle or sheep • who gather leaves from which eucalyptus or other oil is to be distilled." <p>Renewable energy infrastructure projects ARE NOT primary production nor compatible with adjacent land uses due to potential impacts discussed throughout this document.</p>

Bushfire Risk & Fire Fighting Limitations

EIS Main report page & statement	Response/Concern
<p>Page ES.12 Emergency services capability will be supported by ensuring access and water volumes are maintained for any bushfire emergency response.</p>	<p>Lightsource BP should be responsible for emergency services required for the Sandy Creek Solar project not put pressure on existing, stretched, emergency services.</p>
<p>Page 221 The area where the temporary workforce accommodation facility is proposed is mapped as bushfire prone and could potentially be exposed to a bushfire threat. Increased resident densities on existing bushfire prone lots may heighten the level of risk to occupants.</p>	<p>Sandy Creek Solar accommodation facility should not be permitted if it is deemed to "heighten the level of risk to occupants".</p>
<p>Page 222 The accommodation facility will have a static water and hydrant supply, complying with the following recommendations of PBP:</p> <ul style="list-style-type: none"> • a minimum 50,000L static water supply (above ground storage steel or concrete tank) • connections suitable for firefighting purposes located within the workforce accommodation facility, being 65 mm Storz outlets 	<p>With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of expelling 280L/minute meaning 50,000L of water would be used in under 3 hours. During most grass or bushfires there are numerous fire fighting trucks and trailers, often owned by private landowners used in an attempt to extinguish the fire in a timely manner for the</p>

<ul style="list-style-type: none"> • fire hydrant, spacing, design and sizing complies with the relevant clauses of Australian Standard AS 2419.1:2021 • fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2021 • a fire hose reel system be constructed in accordance with AS/NZS 1221:1997, and installed in accordance with the relevant clauses of AS 2441:2005 • unobstructed access to water supply points at all times • all above-ground water service pipes are metal, including and up to any taps. 	<p>obvious reasons of there being less damage caused. An average call out for RFS members and local landowners would see at least half a dozen vehicles/trucks attend – six 38mm nozzles would use 50,000L in under 30 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 50,000L is not enough water to adequately fight even the smallest of fires in rural NSW, and certainly not enough water to adequately protect 350 workers and an accommodation camp.</p> <p>Lightsource BP should be responsible for protecting the accommodation camp with two RFS category 1 equivalent fire trucks, manned by employees/contractors, to alleviate any impacts on local emergency services.</p>
EIS Appendix Q page & statement	Response/Concern
Page 23 Bushfire fuel management can be achieved by frequent slashing mowing, chemical application, and ongoing agricultural practices such as grazing intensities. The targeted grassland structure within the PV array will be the same as for the APZ, with a nominal target of maximum 10cm grass height.	Considering solar factories generate “green energy”, will the grass be slashed by an electric tractor negating the need for the burning of diesel?
Page 24 A dedicated static water supply for bush firefighting purposes should be provided at strategic locations within and around the solar farm, having consideration for essential equipment and accessibility (e.g., near the main entrance). A minimum 20,000L capacity steel tank supply for the solar farm would provide nominal emergency water supplies, however, the Project has capacity to provide a larger, community focussed emergency water supply (example provided Plate 2).	<p>How many fire fighting tanks would be strategically located around the project? A 38mm nozzle would use 20,000L in 71 minutes. A bushfire requires many fire fighting units meaning 20,000L would not last long enough to be of use during a fire emergency.</p> <p>Where would the larger, community focussed emergency water supply be sourced?</p>
<p>Attachment 3 Page 2 Increased resident densities of existing lots that are bush fire prone may heighten the level of risk to the occupants. The presence of additional dwellings can impact on the evacuation and sheltering of residents during a bush fire.</p> <p>Attachment 3 Page 8 Emergency management planning for the temporary workforce accommodation facility will provide suitable emergency and evacuation arrangements for occupants of the temporary workforce accommodation facility.</p>	<p>How does Lightsource BP propose to protect local landowners and residents during a bushfire? Where will the Sandy Creek Solar project workforce be evacuated to during a bushfire emergency? How will they be safely evacuated without impeding local landowners?</p> <p>Will Lightsource BP employees be moved off site during high fire danger periods? Where will they be evacuated to?</p>
EIS Appendix L page & statement	Response/Concern

Page 45 From the hills within the development footprint, wooded ridgelines are visible beyond the Project boundary. To the east of the Project is a ridgeline within the Tuckland State Forest. South of the Project is Dapper Nature Reserve. And north of the Project is Cobbora State Conservation Area.	The risk of any fire originating from the solar project entering State Forest, Nature Reserve or Conservation Area and becoming uncontrollable (ravaging habitat and wildlife) should be recognized. How does Lightsource BP plan to adequately protect other land from the risk of bushfire originating from the solar project?
EIS Appendix R page & statement	Response/Concern
Page 59 There is a Rural Fire Brigade (RFB) shed adjacent to the Project site, located at 1006 Spring Ridge Road, Dunedoo. As reported during SIA engagement, this shed is operated by volunteer firefighters who live in the local community (see Section 5.3.1).	Has Lightsource BP consulted with the local volunteer fire fighters, who man the shed adjacent to the project? Do those men and women, who voluntarily risk their lives to protect local homes, businesses and environment, have concerns about the risks associated with the proposed project? Are they willing to fight a fire within the solar project site?

Roads, Traffic & Transport

EIS Main report page & statement	Response/Concern
Page 58 The Project's construction traffic volumes are expected to have a minimal impact on the Golden Highway.	What constitutes minimal impact? Will Lightsource BP be responsible for any local residents injured in vehicular accidents involving its employees/contractors?
Page 191 With the implementation of the mitigation measures presented in Table 6.3, the road network is expected to operate at a safe and acceptable level.	Safe and acceptable to the local community, who will be most heavily impacted, or as per guidelines?
EIS Appendix L page & statement	Response/Concern
Page 15 Internal access roads will be constructed to facilitate access to the remainder of the development footprint. Internal access roads will be approximately 4 m to 6 m in wide. An internal perimeter access road will be located around the perimeter (where feasible) of the development footprint and will form part of a 10 m asset protection zone that will surround the site infrastructure. One public road crossing will be utilised on Sandy Creek Road to allow Project-related vehicles to move across the public road corridor and between parcels of land that form part of the development footprint.	How will internal access roads be rehabilitated at the end of the project life?
EIS Appendix R page & statement	Response/Concern
Page 61 Significantly, a common theme emerging from SIA engagement was the condition of the roads within Dubbo Regional LGA and Warrumbungle Shire LGA. This includes a number of major roads, including the Golden Highway, where there is a high level of flood damage and potholes, where road accidents are reportedly common.	Local roads are in a state of disrepair for a number of reasons – under resourced LGA's, incomplete works, increased traffic including heavy vehicles and wet weather. Road user safety will be a major issue on the Golden Highway in particular considering the amount of traffic.
EIS Appendix N page & statement	Response/Concern

<p>Page 51 If no on-site accommodation facility is provided, daily traffic during the peak construction month is expected to reach 60 light vehicles, 20 shuttle buses and 37 heavy vehicle movements, for a total of 117 daily vehicles (234 daily vehicle movements). However, if an on-site accommodation facility is provided during the peak construction periods, the total daily traffic movements by all vehicles will be reduced by 50% approximately to 59 daily vehicles (118 daily vehicle movements).</p>	<p>The predicted 118 daily vehicle movements, or worst case 234 vehicle movements, is, although not according to traffic data calculations, a huge increase in traffic for the local area. This will turn quiet, local roads into heavily trafficked transport routes. This will be an enormous impact to local residents.</p>
---	--

Water Sources

EIS Main report page & statement	Response/Concern
<p>Page 60 The estimated water demand for construction of the Project is approximately 70 megalitres (ML) per year (ML/year), or 165 ML over the 22-28 month construction period. The majority of this water will be required for dust suppression, with other minor uses including site amenities, fire protection, and washing of construction equipment and plant. During construction of the Project, non-potable water will be sourced via multiple groundwater bores including some existing licensed bores on the property. Additional bores are yet to be constructed but will be located within the development footprint, targeting the regional porous rock aquifer.</p>	<p>Has Lightsource BP been given permission to utilise the groundwater bores on the property? Are these stock and domestic bores? How many additional bores is Lightsource BP considering?</p> <p>Will Lightsource BP be forced to cease using water if the water level of other bores in the district begin to drop? Livestock water is essential for the agricultural industry.</p>
<p>Page 199 It is proposed to also source water opportunistically during construction and operation from existing landholder dams in accordance with harvestable rights, to further minimise demand for imported water. Licensing of water will not be required provided the total volume of dams used for such purposes is within the maximum harvestable right dam calculator (MHRDC), and otherwise comply with the applicable harvestable rights order.</p>	<p>Will this water use impact the water sources for sheep intended to graze under the solar panels?</p>

Surface Water & Run Off

EIS Main report page & statement	Response/Concern
<p>Page 201 The primary risk to groundwater quality during construction is accidental spillage of wastewater, fuel or other hazardous materials used to support site activities that may infiltrate through soils to groundwater. The study area includes mapped zones of groundwater vulnerability (DLWC 2001).</p>	<p>Groundwater vulnerable zones should be protected!</p>
EIS Appendix L page & statement	Response/Concern
<p>Page 16 The site is anticipated to be subject to minor overland flooding, as well as more</p>	<p>The creeks in the study area have been known to rise very quickly during periods of intense rain</p>

concentrated flows along Sandy Creek, Broken Leg Creek, Spring Creek, and smaller unnamed drainage lines that traverse the site.	and move enormous amounts of water. Any disturbance could cause adverse impacts over the whole site and further down stream, into the Talbragar River.
--	--

Visual Impact & Noise

EIS Appendix L page & statement	Response/Concern
Page 48 No significant scenic vistas have been identified as having potential to be impacted by the Project.	Who classifies significant scenic vistas? Is it the people who value aforementioned vistas, or those assessing project impacts, employed by the developer?
Page 79 It should be noted that people living near the Project area value views of the landscape. It may therefore be detrimental to install plants to screen the view of the Project infrastructure, which will also block views of the landscape. Care must be taken when proposing landscape screening that may create other adverse effects. It is therefore recommended that any landscape screening be done in consultation with the landowners and/or people affected by the Project.	I am confused as to why it is detrimental to install plants to screen the view of a solar factory because people living near the project value views of the landscape, yet the solar panels themselves are not considered a blight on the landscape. Has Lightsource BP asked those who will have views of the project their opinion regarding the change of landscape to an industrial installation?
Page 83 Construction impacts are considered temporary, and therefore are not considered to need any mitigation or screening treatment.	What timeframe is considered permanent? I do not believe two years is temporary.
Annexure A Viewpoint 15 No mitigation is required due to the low visual impact rating. Distance to development 730m. (see photomontage below)	I do not believe this view can be classified as low impact. The solar panels are proposed 730 metres from the residence and will be prominent in the view.

Inset 10: Full-size 50mm image of the area with highest visual impact



Note: the full-size 50mm image used for this image provides a 40° horizontal field-of-view.

E210657 | RP | v2

Landscape Plan

EIS Appendix L Annexure B	Response/Concern
Plant Schedule: Tubestock	Whilst I acknowledge tubestock is the most cost effective and successful way to plant trees and shrubs a lot of the tree species suggested are very slow growing. When does Lightsource BP expect the visual screening will be effective?
Planting shall commence as soon as practicable and where applicable upon completion of initial site works.	What stage is "as soon as practicable"? Prior to, during, or post construction?

<p>Monitoring is likely to be required:</p> <ul style="list-style-type: none"> • Monthly for the first 6 months, • Once every 3 months for the following 18 months, • Subsequent years if required. Frequency to be discussed. 	<p>What time of year will planting take place? If planting is carried out during the warmer months tubestock trees and shrubs will need watering more often than once a month.</p> <p>I note the contract for landscaping is 24 months. What will happen thereafter?</p>
---	--

Heritage

EIS Appendix L page & statement	Response/Concern
<p>Page 42 As outlined in the Statement of Heritage Impact (EMM 2023c), there will be impacts to heritage values in the development footprint as a result of the construction and operation of the Sandy Creek Solar Farm, and the associated transmission and road infrastructure. There will be a minor loss of significance of the existing rural agricultural and pastoral landscape, which consists of cleared fields, paddocks, fences, and archaeological sites. The current aesthetic of the valley, cut through by a creek, which is one that is recognisable from its early historical phase, will be changed to industrial and utility-oriented landscape.</p>	<p>Many people live rurally due to the large open spaces and scenic vistas – they are very valuable to the local community. The change to an industrial and utility-oriented landscape is a major loss and extremely significant to people who have lived in the area for generations. Rural landscapes are also a tourist attraction. Will there be any attraction left in the area for travellers to visit?</p>
<p>Page 42 Overall, impacts to historical cultural values are not predicted to be significant, and where loss of value occurs, it can be recorded and mitigated using accepted methods.</p>	<p>Agriculture, the local community and the generations of farmers that came before us are considered historic cultural values to the majority of community members in rural Australia. The loss of valuable agricultural land and community cohesion due to manipulative tactics being used by developers to divide and conquer landowners cannot be mitigated and will be significant to the local community. Agricultural businesses provide income to small businesses within rural towns, keeping them alive. The loss of community cohesion is, and will continue to, affect organisations within the district that rely on volunteers – this is how rural communities survive.</p>

Telecommunications

EIS Main report page & statement	Response/Concern
<p>Page 60 Telecommunication utilities are not available at the Project site. As such, the cellular network will be used during construction. During operations, connection to telecommunications will be via optical fibre expected to be installed along transmission lines, with cellular backup.</p>	<p>The cellular network in the local area is struggling to service the current population. The influx of CWO REZ workers will significantly decrease the capacity of the network putting locals at risk of not being able to contact emergency services. What does Lightsource BP propose to ensure the local community is not without adequate cellular network coverage?</p>

Electricity Use

EIS Main report page & statement	Response/Concern
---	-------------------------

Page 60 Access to electricity during construction will be via the local distribution network, backed up by diesel generation where required.	Coal fired power and diesel generation used to construct a renewable energy installation – is that “green energy”?
EIS Appendix Q page & statement	Response/Concern
Attachment 3 Page 8 It is estimated that the temporary workforce accommodation facility will require 2.6 - 2.8 kWh of electricity per person per day. Electricity will be generated on-site using solar panels and batteries.	How many kW of solar panels and kWh of battery storage will be installed to service the accommodation facility during construction? Will that be installed prior to any other construction activities? Will there be onsite storage of diesel? If so, where is the proposed storage site and how many litres?

Workforce

EIS Appendix R page & statement	Response/Concern
Page 85 Based on an average construction workforce of 245 workers, it is assumed that at about 49 workers (20% of average workforce numbers) would be sourced from the surrounding area which includes Dubbo, Wellington, and Gulgong.	Considering the number of other renewable energy projects is it realistic to expect to find 49 workers without employment within the study area?
Page 116 It is proposed that the Project encourage operation workers to contribute to the local community through volunteerism or other initiatives.	Does this suggest construction workers will not contribute to the local community?
Page 116 The implementation of comprehensive Community Engagement Plan and Worker Code of Conduct could mitigate perceived privacy and public safety risk. Further, the Project could coordinate with community services such as police and emergency services to familiarise relevant services with the Project in case of an incident.	How, specifically, will the Community Engagement Plan and Worker Code of conduct mitigate perceived privacy and public safety risk? What sort of incident does Lightsource BP consider possible? Can Lightsource BP guarantee the safety of local community members?

Social Impacts

EIS Appendix R page & statement	Response/Concern
Page 59 Within Warrumbungle Shire LGA, sparse resources and geographic isolation are key challenges, meaning hard and soft social infrastructure, such as community services and civil infrastructure, require strategic coordination across the LGA to meet resident’s needs. An ageing population is another key challenge for Warrumbungle Shire LGA, requiring planning for an increasing demand for support services.	Warrumbungle Shire Council (WSC) is under resourced, not just financially, meaning community services and facilities struggle to be adequately maintained. An increased demand in support services will severely impede WSC’s ability to provide rate payers with the services required. WSC will not benefit from the financial contributions made through the voluntary planning agreement with Lightsource BP without a strategy to employ and retain staff with the capacity to utilise the substantial funds in a way that will be beneficial to local communities and rate payers.
Page 59 SIA engagement found that access to general practitioner (GP) and other health	Access to health services in rural and regional NSW has been lacking for decades but has

<p>services has become increasingly more difficult in the regional area, with longer wait times (see Section 5.3).</p> <p>Page 60 Further, Warrumbungle Shire LGA demonstrates constraints in the availability of GPs and health professionals, with about half the rate of GPs and a quarter the rate of health professionals available compared to NSW</p>	<p>escalated rapidly in the last 10 years. Any increase in population will further exacerbate this situation causing more issues for the local community with regard to access to health services.</p> <p>How does Lightsource BP plan to address the needs of the workforce, and operational staff, for the Sandy Creek Solar project when considering the lack of GP's and health professionals within rural NSW, more specifically the Warrumbungle LGA?</p>
<p>Page 59 Within the local study area, there is 1 police station, 1 ambulance station, 1 fire and rescue station, 3 rural fire service brigades, and 1 State and Emergency Service (SES) location. The emergency services in the local study area are primarily located in Dunedoo. While Dunedoo has a police station, it is not staffed 24-hours (see Section 5.3).</p>	<p>Emergency services are stretched within rural NSW. The local police officer is, when on duty, often tasked with patrolling a large area, meaning Dunedoo is often without a constable in the township. The Fire and Rescue brigade is made up of mostly locals who work full time, and while they are paid for call outs, most do it as a service to their community. The RFS brigades and SES are made up entirely of volunteers.</p> <p>How will Lightsource BP contribute to bolstering emergency services personnel (mainly volunteers) within the local area?</p>
<p>Page 62 Furthermore, management of mental health conditions can be impacted by the ability to access mental health services. As indicated in Section 4.9.2, access to GP and other health services is constrained in the Dubbo Regional LGA.</p>	<p>The "rapid transition to renewable energy" is contributing to mental ILL health within the CWO REZ. Stress attributed to operating, under construction and proposed projects is affecting local landowners and community members, their ability to socialise with others and successfully run their businesses. From falling out with neighbours over renewable energy projects and family disputes to lack of sleep due to worry, research and submission writing etc, and concern over compulsory acquisition for transmission projects, and everything in between.</p> <p>Landowners within the CWO REZ have been calling on EnergyCo to assist with mental health services for more than 8 months without success.</p>
<p>Page 62 Volunteering rates can give an indication of social cohesion in a community, and the willingness of people to help each other. Rates of volunteering work within the local study area (24.2%) was significantly high compared to the nearby regional communities (13.3%), the regional study area (15.3%), area of reference (15.6%), and NSW (13.0%). Goolma and Dunedoo have the highest rates of volunteering in the social locality (29.3% and 24.7% respectively).</p>	<p>Small rural communities rely on volunteers to thrive and prosper. I believe the rates of volunteering in these communities will drop significantly due to the loss of social cohesion attributable to conflicts regarding renewable energy projects like Sandy Creek Solar. The majority of community events, ie. the Dunedoo Show, Art Unlimited, Tunes on the Turf, would not happen without the enormous efforts made by community focussed volunteers. Renewable energy developers have been donating large sums of money to local events causing some</p>

	<p>generous local benefactors to withdraw their support.</p> <p>Small towns need ‘boots on the ground’ support, not large amounts of money thrown at events. Who will be left to do the manual labour when the money dries up in years to come?</p>
<p>Page 116 The accommodation facility will host up to 350 workers at any one time, meaning the local area will experience a very large increase in population over the 28 month construction period. This population increase has the potential to change the character of the local area, which may lead to impacts such as changed community identity and reduced social cohesion.</p>	<p>Many people reside in rural areas due to the character of the area and sense of community. Will small towns saddled with numerous renewable energy developments lose valuable contributing community members and generational inhabitants due to these projects?</p>
<p>Page 117 As discussed in Section 6.2.2iii, up to 5,000 construction workers are required for projects in the surrounding area. This is likely to have considerable impacts to the local population composition and may have implications to the general feeling of safety, wellbeing, and local identity amongst existing residents.</p>	<p>If, as shown on page 116, 350 workers for the Sandy Creek Solar project alone is categorized as a “very large increase in population”, what describes the potential 5,000 workers in the surrounding area?</p> <p>Is it acceptable that those areas unfortunate enough to have been declared Renewable Energy Zones must face negative impacts to their general feeling of safety, wellbeing and local identity whilst those in major cities benefit from “green energy” without the consequences?</p>

Accommodation

EIS Appendix R page & statement	Response/Concern
<p>Page 91 LSbp acknowledges the capacity limitations in short-term accommodation across the regional area. While LSbp will utilise the accommodation facility for most workers, some will require accommodation nearby. This includes Project personnel who may not wish to use the accommodation facility or during peak workforce periods where the accommodation facility cannot accommodate all workers required.</p>	<p>How will Lightsource BP ensure workers from the Sandy Creek Solar project, not accommodated in the TWA, will not adversely impact the accommodation requirements local residents, tourism or labour force required for other industries?</p>

Community Benefit Sharing

EIS Main report page & statement	Response/Concern
<p>Page 99 LSbp is proposing to enter into a voluntary planning agreement (VPA) with Warrumbungle Shire and Dubbo Regional Councils.</p> <p>LSbp will contribute to community enhancement, training, and education through the REZ access fees to a sum of \$2,300 per MW per year, or \$1.61 million per year.</p>	<p>The proposed sum to be contributed by Lightsource BP to the two affected councils is substantial, however, without the capacity to utilise the funds or manage potential projects, will it be a complete waste?</p> <p>How does Lightsource BP propose to ensure the financial contributions they propose are for the benefit of the local communities and landowners most negatively affected by the Sandy Creek Solar project?</p>

Biodiversity

EIS Main report page & statement	Response/Concern
----------------------------------	------------------

<p>Page 101 There are no areas of outstanding biodiversity value within the study area, as declared by the NSW Minister for Energy and Environment.</p>	<p><i>According to WWF “biodiversity is all the different kinds of life you’ll find in one area—the variety of animals, plants, fungi, and even microorganisms like bacteria that make up our natural world. Each of these species and organisms work together in ecosystems, like an intricate web, to maintain balance and support life. Biodiversity supports everything in nature that we need to survive: food, clean water, medicine, and shelter.”</i></p> <p>What constitutes outstanding biodiversity?</p>
--	---

Sheep Grazing

EIS Main report page & statement	Response/Concern
<p>Page 157 However, the land could be utilised for some agricultural practices during Project operation through the implementation of agri-solar initiatives such as sheep grazing (solar grazing), which is estimated to achieve 75% of existing stocking rates with aspirational targets of 130%. As 963.5 out of 1,668.3 ha (57.75%) of Project land is currently used for grazing, implementing solar grazing could offset a large portion of agricultural productivity impacts with the remaining 704.8 ha of currently cropped land regenerated into grazing pastures. The entire site (less the substation, O&M compound and BESS) will be suitable for grazing.</p>	<p>How does Lightsource BP propose to reach 130% of existing stocking rates?</p> <p>Will the project be split into smaller paddocks?</p> <p>How are sheep moved around within the panels – can working dogs be utilised? Can sheep only be moved at certain times of the day? How will worm burdens be managed for the welfare of the sheep?</p> <p>How does Lightsource BP propose to regenerate the currently cropped land into grazing pastures?</p>
<p>Page 157 Additionally, solar grazing is being successfully undertaken at Lightsource bp’s Wellington Solar Farm in NSW, a similar LSbp solar project.</p>	<p>How many sheep are currently being grazed at the Wellington Solar project? Have any sheep perished whilst grazing within the project area? If so, what was the cause of death? Have there been issues with worm burdens?</p>
<p>Page 157 A full study on the performance and profitability of the grazing operation is due for completion in May 2024.</p>	<p>Are the results from this study publicly available? If so, where? If not, why not?</p>

Battery Energy Storage System (BESS)

EIS Main report page & statement	Response/Concern
<p>Page 48 Two options are being considered for the configuration of the BESS. Option A is a centralised BESS (AC-coupled) located adjacent to the substation. Option B is a decentralised option (DC-coupled), comprising approximately 114 energy storage units located across the development footprint.</p>	<p>See below.</p>
EIS Appendix L page & statement	Response/Concern
<p>Page 13 The BESS Option A (AC-coupled) would use lithium-ion batteries. Batteries will be stored in fully enclosed shipping or modular containers, mounted on concrete pads (Photograph 2.2). Subject to final design and equipment selection,</p>	<p>In the case of a fire within the BESS:</p> <ul style="list-style-type: none"> - will local fire fighters be expected to attend? - will local fire fighters be trained in fire fighting within a BESS?

each battery bank will be approximately 13 m long, 3 m wide and 3 m high, similar to a typical 40-ft shipping container (or two 20 ft shipping containers). The battery banks will be placed in rows and will be separated by a gravel surface.	<ul style="list-style-type: none"> - will toxic fumes be emitted during the fire? - can BESS fires be extinguished or do they have to 'burn out'?
<p>Page 14 The DC-coupled BESS option will involve having smaller BESS units at each inverter location. The dimensions for each BESS unit will be approximately 27 long by 25 wide and will include the following components:</p> <ul style="list-style-type: none"> • One PCU which contains two inverters. • Eight 20 ft BESS containers. • Eight DC converters. 	<p>On page 48 of the EIS main report it states that the DC coupled BESS option will comprise of approximately 114 energy storage units. Page 14 of Appendix L states there will be one PCU, eight 20 ft containers and eight DC converters. I request clarification of how many units will be required for the DC coupled BESS option.</p>

Biosecurity

EIS Main report page & statement	Response/Concern
<p>Page 159 Potential impacts to adjacent lands could include increased presence of biosecurity issues such as weeds and pests, as well as off-site impacts from erosion and sedimentation. Project impacts are anticipated to be limited primarily to the direct study area with minimal impact to adjacent lands.</p>	<p>Weeds and pests are known for their spreading movement, regardless of project boundaries or fences. Foxes, wild dogs and wild pigs are known predators of sheep. How will Lightsource BP protect neighbouring landowners and the district from livestock losses due to pest animals? Will Lightsource BP be responsible for removing weeds brought in and transferred to neighbouring properties?</p>
EIS Appendix K page & statement	Response/Concern
<p>Page 109 Project construction and operation has the potential to increase biosecurity risks through increased weeds and pests. Weeds and pathogens may be introduced through contaminated vehicles, plant and equipment; wind; and the import of contaminated soil, gravels and other substrates as part of Project construction and operation.</p>	<p>Can Lightsource BP guarantee all vehicles will be washed, and free of weeds, pathogens and livestock diseases? Who will be responsible for policing compliance to such mitigation measures, and what will the penalties be for non compliance by employees/contractors?</p>

Affected Landowners & Neighbour Agreements

EIS Main report page & statement	Response/Concern
<p>Page 32 LSbp has entered into lease agreements with the two associated landowners. LSbp has not entered into any agreements with associated or non-associated landowners in relation to mitigation of Project impacts, as the impacts of the Project are not significant enough to warrant such an agreement.</p>	<p>What does Lightsource BP consider significant enough impacts to warrant entering into agreements with non associated landowners?</p> <p>Has Lightsource BP indemnified all landowners directly neighbouring, and in the surrounding area from insurance liability in the case of damage to the solar installation? Is Lightsource BP reimbursing the same direct neighbours, and landowners in the surrounding district, for any increase in insurance premiums? Will Lightsource BP be responsible for rectifying any flooding/erosion on neighbouring, or further downstream properties, caused by construction activities?</p>

EIS Appendix L page & statement	Response/Concern
Page 46 A number of non-associated and associated residences have been identified within and surrounding the Project area, as shown in Figure 4.1. There are two associated residences within the Project site (A01 and A03). There are two unoccupied structures (sheds) associated with the Project (A02 and A04), which are located in the study area. There are 20 non-associated residences within 4 km of the study area, along with Dapper Union Church and the NSW Rural Fire Service.	Has Lightsource BP conducted a survey of the 20 non associated residences within 4km of the study area to gauge the sentiment toward the project from those directly impacted by its construction? If so, please supply details. If not, is it not important to Lightsource BP to have community support for their projects?

Air Quality

EIS Main report page & statement	Response/Concern
Page 245 The Project's main air quality impacts will be temporary as they will occur during construction, which will take approximately 22-28 months. Potential construction air quality impacts will be caused by dust generation from surface disturbance works, exhaust emissions from diesel powered construction equipment, and soil, mud and other organic debris being carried out of the construction site by vehicles (track-out).	How is it acceptable that residences within the area, and farmers working in adjacent paddocks will be subject to poor air quality for 22-28 months? Will that have detrimental effects on a famers ability to work and earn a living or on their livestock?

Households Powered

EIS Main report page & statement	Response/Concern
Page 237 The Project has the potential to provide sufficient renewable energy to support the annual electricity needs of the equivalent to approximately 253,419 NSW households, which is seven times the annual electricity requirements of the EIA study area.	<p>Will the project power the stated number of homes only when the sun is shining, or 24 hours a day, 7 days a week? How is the</p> <p>New South Wales experiences 4-5 hours peak sun hours per day in summer and 3-4 in winter. According to the Australian Energy Regulator in 2023, the average energy used per day by a household with four people is about 21.355 kWh which is equal to 0.89kW. Peak hours of use are 6-8.30am and 5-9pm; all hours outside the peak sun hours. Is renewable energy going to provide reliable and cost effective power to Australian residents?</p> <p>My home and business has been off grid for just over 12 months. We installed 20kW of solar panels and have 44kWh of battery storage with a backup generator. This system is responsible for powering two homes, a water pressure pump and workshop. Without the backup generator our property would have been in the dark at some point on one out of every five days. Solar electricity generation is fantastic when the sun is</p>

	shining but far to intermittent and unreliable to base a grid on.
--	---

Cumulative Impacts

EIS Main report page & statement	Response/Concern
Page 254 There is potential for cumulative construction noise impacts from other concurrent construction works particularly related to CWO REZ infrastructure including Elong Energy Hub and transmission line network. Construction noise impact results are worst case predicted impacts and are only likely to occur for a period of a few months as work is undertaken near the site boundary near noise assessment locations.	Is it acceptable that sensitive receivers are exposed to noise impacts for a period of a few months? Whilst this is temporary, it is not a few hours, but a few months. That could have major impacts on the mental health of directly impacted community members. Are any Lightsource BP employees directly affected by this noise? Imagine it was your home and family in this position.
Page 254 As this Project is within the CWO REZ, cumulative impacts from concurrent construction of renewable energy projects and transmission infrastructure are expected due to the increase in construction vehicles across the road network. However, there is uncertainty regarding other the timing of other projects and therefore the extent of cumulative traffic impacts. Many projects will use the state road network between the Port of Newcastle and the CWO REZ.	There are major cumulative impact issues with regard to the state road network between the Port of Newcastle and CWO REZ. The Golden Highway is a funnel from western NSW to the Port of Newcastle for agricultural freight, both inputs and products for export. The Golden Highway is also a major route for livestock transport. The use of the Golden Highway by the vast majority of heavy and OSOM destined for the CWO REZ has the potential to increase accidents (severe and fatal) due to frustration from other road users. According to truck drivers road users are already making dangerous decisions on the Golden Highway to pass heavy vehicles. My property is split by the Golden Highway. Walking livestock across the highway to access feed and water is an onerous task; one often fraught with danger. How will landowner safety, and that of their livestock, be guaranteed by Lightsource BP due to project traffic increases on the Golden Highway? The cumulative traffic impacts to the Golden Highway must be clarified and quantified, and adequately addressed prior to determination of any CWO REZ renewable energy projects.
Page 255 Due to the large-scale and expansive nature of the CWO REZ, cumulative impacts are unavoidable to some extent and should be combatted at a policy level. The NSW Government and EnergyCo have an important role to play in terms of ensuring a coordinated, strategic approach is taken to address many of the cumulative impacts.	How does Lightsource BP suggest the NSW Government and EnergyCo combat the unavoidable cumulative impacts of renewable energy infrastructure projects within the CWO REZ?
Page 255 Competition for labour could result in worker poaching and temporary wage increases which can render local businesses unable to	As a farmer, I can personally attest to the fact agricultural businesses are currently struggling to find labour, both on permanent full time and

retain workers. Additionally, competition for workers, goods, and services are expected to magnify competition in the regional market which could price out smaller businesses seeking the same resources, affecting their commercial viability and profitability, which could ultimately result in business closure (Black, Land & Nunn 2021).	contract or short term basis'. It is common knowledge that agriculture cannot compete with mining, and I'd suggest renewable energy infrastructure wages, therefore finding labour will only become harder for farmers. Less labour means less productivity and therefore less food and fibre. Price increases for inputs will see small businesses within rural and regional areas struggle and possibly close. How does Lightsource BP plan to protect small rural businesses within the local district?
Page 256 Projects are required to mitigate their own impacts to acceptable levels, which will minimise cumulative impacts overall.	What is an acceptable level when considering mitigation measures?
EIS Appendix K page & statement	Response/Concern
Page 111 Cumulative impacts to soil, land and agriculture primarily relate to potentially reduced regional LSC and associated impacts to agricultural land productivity and availability within the REZ and relevant LGAs throughout construction and operation, as well as construction impacts on erosion and sediment control. Impacts from projects may include site erosion and/or sediment resulting in reduced soil availability and sediment migration to watercourses that pass through or occur downstream of a construction site.	The agricultural industry is financially valuable to the economy; local, state and country wide. Regions losing production will impact rural and regional areas, possibly ruining some small villages and towns in the process. Erosion and sediment migration are known issues at solar installations currently operating and under construction – neighbours dams have been filled with sediment, water courses have been changed causing flood damage in sheds (where flood water had not been prior) and all weather access roads have been flooded and damaged. Once these impacts have occurred mitigation measures will be ineffective.
Page 111 Due to the identification of centralised REZs, the cumulative impacts on availability of agricultural land within these areas is unavoidable.	The CWO REZ was declared without proper community consultation or engagement. If there was better information sharing and more listening to the feedback from community members on the ground, those who are left to deal with the impacts of decisions from above, maybe the availability of agricultural land would not be at risk; at the very least there would not be unavoidable impacts.
Page 132 Overall, potential Project and cumulative impacts during construction and operation are considered minor and can be adequately managed through the implementation of the mitigation measures outlined in Section 8.	Are the cumulative impacts considered minor to those assessing the project, who will not live with the potential impacts 24/7, or those who will live with the impacts? How is adequately managed defined?

Project Justification

EIS Main report page & statement	Response/Concern
Page 257 The study area location was selected and is considered highly suitable for the Project due to: <ul style="list-style-type: none"> • high solar irradiance 	The Elong Elong Energy Hub is not yet approved – what is Lightsource BP's alternative plan to export energy into the grid if the CWO REZ transmission project is not approved?

<ul style="list-style-type: none"> • proximity to the proposed Elong Elong Energy Hub (with capacity to export energy into the grid) • site location within the CWO REZ • limited mapped biophysical strategic agricultural land within the study area • high degree of historical land clearing and absence of high value native vegetation • zoned RU1 which is a prescribed zone where electricity generating works are a permissible land-use and the environmental and planning constraints can be effectively managed • suitable vehicular access from the Golden Highway and Sandy Creek Road • adequate development footprint size • minimal topography constraints • low flood risk • landholder willingness to enter into legal agreements • isolated nature of the surrounding valley and low number of receivers relative to the size of the Project • suitable distance from major townships (approximately 25 km) 	<p>The CWO REZ was declared without the knowledge or consent of the local community making the district a target for renewable energy projects – should not be justification for the location of projects.</p> <p>No BSAL should be impacted by renewable energy infrastructure.</p> <p>According to the Warrumbungle LEP electricity generating works are not permissible within the RU1 zone.</p> <p>How many receivers is low? Isolated is defined as “far away from other places, buildings or people” – the Central West Slopes and Plains is not isolated.</p> <p>What constitutes a “suitable distance from major townships”?</p>
<p>Page 266 The assessments undertaken and conclusions reached demonstrate the Project can be constructed and operated within acceptable limits though the implementation of mitigation and management measures described in Chapter 6 and Appendix F. The Project will not result in significant impacts to the environment or community. It is considered that the environmental, social, and economic benefits for the local, regional, and NSW communities far outweigh the temporary impacts resulting from development and operation of the Project. Therefore, the Project is in the public interest.</p>	<p>What are acceptable limits?</p> <p>What constitutes significant impacts to the environment or community?</p> <p>What time frame is considered temporary? I note the term has been used for construction (22-28 months) and operation (40 years minimum). I do not believe 40 years temporary!</p> <p>Public interest is defined by Collins Dictionary as “the welfare or well-being of the general public; commonwealth”. As members of the general public I do not believe projects like Sandy Creek Solar are in the interest of the landowners and community members directly affected by the potential monumental impacts of it, and the cumulative impact of all projects within the district and state.</p>

Decommissioning & Rehabilitation

EIS Appendix K page & statement	Response/Concern
<p>Page 131 At the end of the Project life, the development footprint will be rehabilitated to a condition as near as practicable to the condition that existed prior to construction of the Project and in consultation with the landowner.</p>	<p>How will the rehabilitation of the land be carried out?</p> <p>How long until the land will be capable of producing what it did prior to construction?</p> <p>Will Lightsource BP be responsible for replacing trees destroyed during construction?</p> <p>How will livestock find shade a shelter until any replacement trees are mature?</p>

	Lightsource BP has already sold five Australian solar projects. Will any agreements regarding decommissioning and rehabilitation made by Lightsource BP be honoured or will new agreements need to be made with any potential new owner of the project?
--	---

Warrumbungle Shire Council

EIS Main report page & statement	Response/Concern
Page ES.1 RU1 Primary Production zoning under the Warrumbungle Local Environmental Plan 2013 (Warrumbungle LEP) and the Dubbo Regional Local Environmental Plan 2022 (Dubbo LEP), which is a prescribed zone where electricity generating works are a permissible land-use and the environmental and planning constraints can be effectively managed.	Electricity generating works (ie. solar, wind, transmission infrastructure) is not listed as permitted with or without consent in the Warrumbungle LEP. Warrumbungle LEP 1.2 Aims of Plan (2)(c) to encourage the retention of productive rural land for agriculture
EIS Appendix L page & statement	Response/Concern
Page 48 The Warrumbungle Shire Council has identified Warrumbungle is supportive of community connectivity, growth and resilience, and encourages a healthy environment and community as the vision of the community in their Local Strategic Planning Statement (LSPS) (2019). This would indicate there is a high value placed on the environment. This includes elements such as: <ul style="list-style-type: none"> • ensure that development is not permitted to be built in areas that are significantly impacted by flood waters • ensure that development is not permitted to be built in areas that are highly bushfire prone • ensure Council encourages private water supply through the installation of rainwater tanks • protect important agricultural land in local planning controls • support the agricultural sector and associated businesses in each locality • manage land use conflicts on agricultural land • restrict the separation of incompatible land uses surrounding agricultural land • avoid the location of incompatible land uses adjacent to agricultural production areas • investigate opportunities for the expansion of existing and new industrial precincts in our townships that do not impact on residents • protect and recognise existing industrial precincts and uses to avoid land use conflicts from future residential development • encourage the co-location of complementary industry alongside agricultural enterprises that 	Warrumbungle Shire Council advocates for developments not being built in highly bushfire prone areas, protection of important agricultural land, supporting the agricultural sector and associated businesses, managing land use conflicts on agricultural land and avoiding the location of incompatible land uses adjacent to agricultural production areas. All of these elements suggest installing renewable energy infrastructure, and changing the landscape to an industrial area is against Warrumbungle Shire Council policy. Warrumbungle Shire Council has continually objected to proposed renewable energy projects within the LGA.

enhance the efficiency of the agricultural land use.	
--	--

Inaccuracies & errors

EIS Main report page & statement	Response/Concern
<p>Page 21 Residences and farm structures are dotted across the landscape. There are two associated residences within the study area (A01 and A03), though only A01 is an occupied residence, and two associated unoccupied structures (sheds and yards) (A02 and A04). There are 23 non-associated residences within 4 km of the development footprint.</p> <p>Appendix L Page 59 There are a total of 25 dwellings within 4 km of the development footprint. The highest visual impacts are likely to be experienced from dwellings within close proximity to the development footprint.</p> <p>Appendix L Page 46 A number of non-associated and associated residences have been identified within and surrounding the Project area, as shown in Figure 4.1. There are two associated residences within the Project site (A01 and A03). There are two unoccupied structures (sheds) associated with the Project (A02 and A04), which are located in the study area. There are 20 non-associated residences within 4 km of the study area, along with Dapper Union Church and the NSW Rural Fire Service.</p>	How many non associated residences are there within 4km of the development footprint?
<p>Page 157 Additionally, solar grazing is being successfully undertaken at Lightsource bp's Wellington Solar Farm in NSW, a similar LSbp solar project.</p>	According to Lightsource BP's website Wellington Solar was sold to Beijing Energy International Australia in December 2023.
<p>Page 165 Two solar projects under construction include Stubbo Solar Farm and Dunedoo Solar Farm.</p>	While the Dunedoo Solar project has been approved, it is not currently under construction.
EIS Appendix L page & statement	Response/Concern
<p>Page 73 Dunedoo Solar Farm (approved and under construction) located 25 km east of the Project</p>	While the Dunedoo Solar project has been approved, it is not currently under construction.
<p>Page 68 Based on the glare analysis, there is potential for glint and glare related impacts at 13 residences and along the roads adjacent to the Project.</p> <p>Page 84 Based on the glare analysis, there is potential for glint and glare related impacts at 16 residences and along the roads and rails adjacent to the Project.</p>	Disparity between the number of residences potentially impacted by glint and glare within the same document, less than 20 pages apart.
EIS Appendix R page & statement	Response/Concern
<p>ES.1 The closest township to the Project site (30 minute drive north-east) is Dunedoo, with a</p>	According to Google Maps, Dunedoo (Post Office) is 23.3km from the Golden Highway/Sandy Creek

population of 1,097. The Dunedoo township makes up for about a third of the population that comprises the local study area.	Road intersection and therefore approximately a 15 minute drive.
ES.1 Dubbo is a major regional city and a key urban area of the Far West and Orana region, located about a 70-minute drive west of the Project site.	According to Google Maps, Dubbo (Post Office) is 66.7km from the Golden Highway/Sandy Creek Road intersection and therefore approximately 45 minute drive.
Page 41 The Warrumbungle Shire LGA is situated on the north-western slopes and plains of NSW, about two hours' drive from Dubbo (REMPLAN, 2023).	The Warrumbungle LGA is located within the Central West Slopes and Plains. Coonabarabran is the largest town within the Warrumbungle LGA and is located 144km from Dubbo (approximately a 90 minute drive).
Page 42 The closest township to the Project is Dunedoo, which is a 30-minute drive north east of the Project site , about 55 minute drive north of Mudgee and 90 minute drive east of Dubbo.	According to Google Maps, Dunedoo (Post Office) is 23.3km from the Golden Highway/Sandy Creek Road intersection and therefore approximately a 15 minute drive. Also according to Google maps Dunedoo (Post Office) is 90km from Dubbo (Post Office) and therefore an hours drive.
Page 42 Dunedoo has more facilities than typical villages of similar size , and functions as a service centre for the surrounding district, particularly for villages within the Warrumbungle Shire LGA.	Dunedoo has very similar facilities to other rural towns of comparable population and size. Coolah is another town within the Warrumbungle LGA with much the same facilities available.
Page 42 The local economy involves wheat, cattle, mixed farming, timber , lambs, and wool production.	Timber industry?
EIS Appendix N page & statement	Response/Concern
Page 45 Table 5.9 Elong Elong Energy Hub – EnergyCo – CWO REZ transmission infrastructure, located adjacent to (and within) the project site – IOn exhibition	The CWO REZ transmission project EIS was on exhibition from 28 th September to 8 th November 2023. It is currently being assessed by the DPHI.

Conclusion

When the inaccuracies and errors within the EIS documents are considered the lack of knowledge of the local area becomes blatantly obvious. There is also an apparent arrogance in the insufficient research conducted by EMM Consulting in preparing the aforementioned reports, and/or the information provided by LightsourceBP; a simple Google Maps directions search would've quickly provided the correct information. The author did not even make the effort to correctly identify the current status of the CWO REZ transmission project. This is insulting to the affected community.

It appears that any negative impacts are low, very low, minor, negligible or insignificant whereas impacts deemed beneficial are moderate and high. Is insignificant, minor or negligible a quantifiable measure when it comes to subjective impacts? Is it acceptable for people that are not currently, nor will ever be likely to, face direct impacts to their personal residence or place of business to assess the potential impacts? The guidelines applicable to assessing impacts of renewable energy projects do not adequately address issues according to the people that will have to live with the impacts.

The rollout of the "rapid transition to renewable energy" has brought the term "social license" in vogue; unfortunately, it seems to be a trendy phrase with no authentic meaning nor does it have any genuine gravity. Should a project be granted consent if the majority of the community affected does not support it, in fact, objects to it?

There are many issues I have failed to address within this document due to time constraints. Inhabitants of the CWO REZ are being pushed to breaking point when considering the number of projects being

thrust upon the area. Cumulative impacts are a major issue not being adequately considered or mitigated by the REZ infrastructure planner, EnergyCo. The NSW Government has rushed into the “rapid transition to renewable energy” without forethought or adequate planning leaving rural and regional NSW reeling.

I do not believe Sandy Creek Solar is in the public interest.

Spicers Creek Wind

Spicers Creek Wind Farm	SUB-61227709	14/08/2023	No	Object
Attachments				
Comment / Message				
Power should be generated where it is to be used. Undertaking renewable projects on agricultural land is not only threatening Australia's food and fibre production but ruining rural communities through division. Why must rural and regional Australia suffer to keep the lights on in metropolitan areas when they are not contributing? It is the cumulative impact of the projects in the Central West that is the most troubling. Where will all the workers be housed during construction? Where will the water for workers and construction come from? How will the roads hold up to all the extra traffic? There are so many more questions without answers. Will this be another Cobbora Coal debacle?				

SPICERS CREEK WIND IPCn SUBMISSION (submitted via IPCn website – 6th September 2024)

Introduction

The Spicers Creek Wind project has the potential to have enormous impacts on the local community and region due to a plethora of possible unintended consequences of turning rural agricultural land into an industrial area.

<u>Excerpt from DPHI Assessment Report</u>	<u>Response/Issue/Question</u>
<u>Executive Summary</u>	
“The project would save up to about 2,060,000 tonnes of greenhouse gas emissions per year and would make a material contribution towards the State meeting its net zero targets and the renewable energy objectives of the Roadmap.”	<p>Whilst the project may contribute to the State meeting its net zero targets and the renewable energy objectives of the Roadmap, what will the implications be for average Australians already suffering from high food prices and farmers attempting to increase production to cater for the predicted increase in population (“from a global perspective, it is estimated that farmers will have to produce 70% more food by 2050 to meet the world’s expected nine billion population” (Office of the Director, Agricultural Development Economic Division, Economic and Social Development 2009))?</p> <p>The following paper discusses such issues.</p> <p>Does the Energy Transition Affect Food Prices and Agricultural Production? (May 29, 2024) By Luccas Assis Attilio (Department of Economics, Federal University of Ouro Preto) & Emilson C.D. Silva (Energy Centre and Department of Economics, University of Auckland)</p> <p>“5. Conclusion We investigated the impact of the energy transition on food prices and agricultural production in a sample of OECD countries. Our findings indicate that the energy transition has a negative effect on these variables, leading to increased food prices and reduced agricultural production. Furthermore, we demonstrated that the degree of the energy transition is significant: the more advanced the transition in the energy matrix, the greater its impact on the food market. The contribution to the literature lies in the analysis of the side effects of the energy transition on food markets. While</p>

	<p>most studies emphasize the benefits of the energy transition, there is a notable gap in research exploring its potential collateral effects. Our results demonstrate that the energy transition is not a neutral process and carries negative consequences. It impacts people's lives.</p> <p>Future research could build upon our results by exploring transmission channels between the energy transition and food markets. We did not delve into frameworks, theories, and rationales describing how the shift to cleaner production might influence food prices. Similarly, monetary incentives were not considered in our analysis. We believe that monetary and economic forces underlie relationships such as the decline in agricultural production due to the energy transition. Additionally, further investigation could scrutinize why advanced stages of the energy transition have a more pronounced effect on food prices and agricultural production. In essence, future research can provide explanations for the results we presented. Rising food prices pose a significant risk to vulnerable populations. Governments can mitigate this situation by offering income transfers to these groups. The studies outlined in this paper have demonstrated the influence of government policies on the energy transition. We contend that in tandem with these policies, initiatives and programs aimed at supporting low-income families are imperative. Otherwise, the energy transition may precipitate and exacerbate a social crisis, disproportionately affecting vulnerable populations."</p>
<p>"The Department is satisfied that the project would not fundamentally change the broader landscape characteristics of the area or result in any significant visual impacts on the surrounding non-associated residences."</p>	<p>The Central West and Orana Regional Plan 2041 states that "the Central West and Orana region is the vast geographic heart of NSW that balances stunning natural landscapes with vibrant regional cities and centres, historic towns and villages, diverse lifestyles, and community festivals and events." And, "the character and identity of the region is celebrated and protected. Scenic landscapes ranging from the globally recognised Blue Mountains and the western plains to unique local settings such as the communities of Wellington and Coonabarabran which enjoy vistas to Mt Arthur Reserve and the Warrumbungle Range, provide aesthetic, social and economic value to the region."</p> <p>How will changing the landscape from one of scenic farmland and native bush to an industrial area not "fundamentally change the broader landscape characteristics of the area" nor "result in significant visual impacts for the surrounding non-associated residences"? What impact will the industrialisation of the area have on businesses that rely on tourism for income? Can the Department, and/or proponent, guarantee local businesses, and the mental health of local community members will not be adversely impacted by the change in landscape and visual amenity of the area?</p> <p>It is important to note that the signing of a host or neighbour agreement with a wind energy proponent does not indicate there is not a significant visual impact at the associated residence, it is simply a tool used to "mitigate the impact of the project on host and neighbouring landowners" negating the need to consider the impact.</p>
<u>Site and Surrounds</u>	
<p>"5. The project is located in the Central West region of NSW within the CWO REZ, an area identified as strategically advantageous with</p>	<p>The project being within the CWO REZ boundary is not adequate justification for its proposal or approval.</p> <p>The current NSW Minister for Energy advised, via Answers to Supplementary Questions raised by Parliamentary Committee 7 through the Budget Estimates Hearing in March 2024, that during the draft CWO REZ declaration exhibition period (17th September – 15th October 2021) there were six supporting submissions received from stakeholders (three from renewable energy developers, two from</p>

<p>strong renewable energy resource potential, proximity to the existing electricity network, and consideration of potential interactions with existing land uses, including agricultural lands and biodiversity conservation.”</p>	<p>public authorities and one from an organisation). There were, however, no submissions received from members of the general public suggesting there was a lack of knowledge regarding the aforementioned draft declaration or the CWO REZ in general, given the numbers of submissions being received by the Department of Planning regarding renewable energy generation projects in the past couple of years.</p> <p>According to Section 19(4)(b)(iii) of the Electricity Infrastructure Investment Act 2020, the Minister may make a declaration of a Renewable Energy Zone only if the Minister has considered the views of the local community in the renewable energy zone. The lack of submissions from the general public begs the question, especially considering the growing resistance against large-scale renewable energy infrastructure projects within the area, has the NSW Government breached legislation in the declaration of the CWO REZ? Is it acceptable to claim justification of project location on the grounds of a REZ declaration that did not consider the views of the local community?</p> <p>The CWO REZ Regional Reference Group was formed in October 2020 and was, according to information received from EnergyCo within the last month (August 2024), made up of Council’s in the Central West region, select electricity providers and the then Department of Regional NSW. Minutes for the forum are not publicly available so it is impossible to ascertain who knew what in relation to the CWO REZ.</p> <p>EnergyCo, as infrastructure planner for the CWO REZ, is responsible for coordinating the design and rollout of the REZ and working closely with communities, investors and industry. In April 2023 the Central-West Orana REZ Steering Committee was established by EnergyCo to identify community benefit opportunities and strategies to coordinate REZ wide impacts. The Whole-of-Government Steering Committee was established by the NSW Government following a recommendation in the NSW Electricity Supply and Reliability Check Up, which was released in September 2023, to coordinate priority areas across the REZ’s.</p> <p>Despite these two committees, formed to coordinate the priority areas across the REZ’s to ameliorate cumulative impacts on affected communities, there is still no coordination by EnergyCo to directly address impacts including accommodation, roads and traffic and emergency and health services.</p> <p>When will EnergyCo and/or the NSW Government release detailed and adequate cumulative impact studies and coordinated solutions to the aforementioned cumulative impacts within the CWO REZ to alleviate the burden on affected communities? Should those studies and solutions be available PRIOR TO approval of individual, private CWO REZ renewable energy generation projects so as not to unfairly encumber affected rural areas?</p>
<p>“11. The site is located within the Macquarie-Bogan River system and extends across the catchments of a number of tributary channels of the Talbragar River. The</p>	<p>According to the NSW Governments Water website (water.dpie.nsw.gov.au) “the Macquarie-Bogan catchment is in the central-west of NSW, and has an area of 74,800 square kilometres. The headwaters of the Macquarie River are in the Great Dividing Range south of Bathurst. The river flows north-westerly until it joins the Barwon River near Brewarrina.</p> <p>Elevations across the catchment range from 1,300 metres in the mountains south of Bathurst, to less than 100 metres near Brewarrina in the catchment’s far north. Below Dubbo, the valley mainly comprises flat alluvial plains with elevations less than 300 metres.</p>

site is not prone to flooding.”	<p>The Macquarie-Bogan catchment supports a range of water users including local councils, water utilities, dryland agriculture, livestock grazing and some irrigated agriculture, such as cotton.</p> <p>Environmental Values – The Ramsar-listed Macquarie Marshes are located on the Macquarie River between Warren and Carinda. When fully flooded the marsh area covers more than 150,000 hectares and is one of the most important colonial nesting waterbird breeding sites in Australia.”</p> <p>Can the Department and the Applicant guarantee there will be no pollution or contamination of the Macquarie-Bogan River system attributable to the Spicers Creek Wind project throughout construction, operation and decommissioning phases? How will Squadron Energy be held responsible if it is found to be at fault?</p>
<u>Renewable energy context</u>	
<p>“13. In 2023, NSW derived approximately 36% of its electricity from renewable sources. The rest was derived from fossil fuels, including approximately 61% from coal and 3% from gas.”</p>	<p>According to AEMO’s National Energy Market (NEM) data, in the 12 months until 10th August 2024, NSW derived 72% of its power from black coal and 2% from gas, totalling 74% from fossil fuels. Generation from renewable energy installations totalled 24% - 11% solar, 9% wind and 4% hydro.</p> <p>In the 48 hours between 18th-20th August 2024, 75% of NSW’s electricity was derived from black coal, and 4% from gas – a total of 79% from fossil fuels. Solar generated 11%, wind 6% and 4% from hydro of power used – a total of 21% from renewable sources.</p> <p>In the three months to the 20th August 2024, fossil fuels contributed 79% of electricity to the NSW grid – 76% black coal and 3% gas. Renewable energy made up a total of 20% - 7% solar, 9% wind and 4% hydro.</p> <p>Fossil fuels, coal and gas, provide the state of NSW, and the country, with reliable, cheap base load power.</p> <p>I understand private large scale renewable energy projects are known to limit, or completely halt, electricity input to the grid due to low electricity prices at peak hours of generation. Is that in the “public interest”?</p>
<u>Permissibility</u>	
<p>“24. The RU1 and SP2 zone include various land uses that are both permitted with and without consent. Under the Dubbo Regional and Warrumbungle Shire LEP’s electricity generating works are not expressly listed as permitted with or without consent, and is therefore a prohibited land use. 25. However, electricity generating works are permissible with consent on any land in a prescribed</p>	<p>The Warrumbungle Local Environmental Plan 2013 provides a framework that guides planning decisions for the local government area through zoning and development controls. The particular aims of the plan are include:</p> <ul style="list-style-type: none"> (c) to encourage the retention of productive rural land for agriculture, (d) to identify, protect, conserve and enhance Warrumbungle’s natural assets, (e) to identify and protect Warrumbungle’s built cultural heritage assets for future generations, (f) to facilitate the equitable provision of social services and facilities for the community, (g) to provide for future tourist and visitor accommodation in a sustainable manner that is compatible with and will not compromise the natural resource and heritage values of the surrounding area. <p>The objectives of zone RU1 – Primary Production include:</p> <ul style="list-style-type: none"> • to encourage sustainable primary industry production by maintaining and enhancing the natural resource base. • to minimise conflict between land uses within this zone and land uses within adjoining zones.

non-residential zone, including land zoned RU1 and SP2, under clause 2.36 of the State Environmental Planning Policy (Transport and Infrastructure) 2021 (Transport and Infrastructure SEPP). Consequently, the project is permissible with development consent."	The Local Environmental Plan was put in place to protect the ratepayers and environment of the Warrumbungle Shire Council - is it acceptable that State policy can simply nullify a local plan; one that is created with local knowledge with local outcomes in mind to protect the immediate, local region?
<u>Mandatory matters for consideration</u>	
<u>Engagement</u>	
<p>"39. The Department publicly exhibited the EIS from 28 July 2023 until 24 August 2023 (28 days) on the Department's website.</p> <p>40. The exhibition was advertised in the Dubbo Daily Liberal and Mudgee Guardian and The Australian, the Department wrote directly to landowners up to 8 km from the project site, notifying them of the proposal and exhibition dates. The Department visited the site and surrounds on 16 to 17 October 2023 and 2 February 2024 and met with non-associated landowners."</p> <p>"41. The Department also consulted with relevant councils and government agencies and members of the community during its</p>	<p>The Spicers Creek Wind EIS documents totalled 2,988 pages – how is it acceptable to expect project affected members of the general public to read, comprehend and respond to this material adequately in such a short amount of time? Community members often have businesses and/or full time jobs, plus family and volunteer commitments yet to are being expected to manage the extra workload of responding to these documents within 28 days.</p> <p>It also needs to be noted that there have been 16 projects within the CWO REZ boundary placed on exhibition between December 2021 and December 2023, including the CWO REZ transmission project (EIS documents for that project alone totalled 7910 pages, not including further reading required to better understand important topics). How are community members, volunteering their time in an effort to protect and preserve their homes, livelihoods, businesses, families, communities and environment, most with little to no experience in submission writing, expected to relay their concerns and adequately respond to paperwork being prepared by industry professionals, whilst being absolutely inundated by the sheer number of projects proposed?</p> <p>Did the Department offer to, or actually meet with, any landowners affected by the transport route, especially along the Golden Highway which is a likely transport route for the majority of projects within the CWO REZ, during their visit to the site and surrounds in October 2023 and February 2024?</p> <p>Who are the relevant members of the community that the Department consulted with during its detailed assessment of the project? What percentage of landowners affected by the project, whether it be through impacts to transport, traffic and roads, aerial applications for agriculture, those with properties downstream, visual and noise impacts etc., is considered enough for the Department to gain adequate insight about the potential impacts expected to be generated by the project during construction, operation and decommissioning?</p>

detailed assessment of the project.”	
<u>Summary of Public Submissions</u>	
<p>“42. During the exhibition of the application, the Department received 68 public submissions of which 67 were unique (57 objecting to the project, seven in support and three comments).</p> <p>43. The majority (about 85%) of the submissions received during the public exhibition objected to the project. As shown in Table 4, most submissions (52%) came from people living further than 50km from the project site, all of whom objected to the project. However, submissions from people living within 15km of the site were more evenly split with approximately 32% supporting the project.”</p>	<p>Squadron Energy’s response to submissions document states the following:</p> <p>“As outlined in the EIS, there were 28 host agreements in place for the Project. In addition to host agreements, SQE had 28 neighbour agreements (44 dwellings) in place with neighbouring landowners (associated landholders) to address various impacts associated with the Project specific to their dwellings.</p> <p>Since the EIS was exhibited, SQE has secured an additional neighbour agreement with GH008 (refer to Appendix 3). SQE now has 29 neighbour agreements (45 dwellings) in place.”</p> <p>Considering Squadron Energy has 57 host and neighbour agreements in place with landowners I wonder why there are only seven submissions in support of the project?</p> <p>Whilst most objections to the project came from members of the public who reside more than 50km from the project does the Department consider that a large proportion of those people may be directly affected by potentially negative impacts generated by the project (ie. roads, traffic and transport)?</p> <p>The Department has failed to calculate percentages including those submissions received from members of the public who live 15-50km from the project.</p> <p>Considering an area within 50km of the project is being inundated with large scale renewable energy developments it is understandable that people within that region would be concerned about potential impacts. 68% of those living within 50km of the project, who made submissions, objected to the proposal, only 21% made supporting statements.</p> <p>What percentage of the local population, or number of objecting submissions, meets the threshold of a project not having “social license”, or being in the “public interest” in the opinion, or guidelines, for the Department of Planning and IPCn?</p>
<p>“46. Submissions in support of the project noted various benefits of the project, including the economic benefits of the project, the creation of jobs, financial support to farmers, road upgrades and improvements to road safety conditions and the benefits of renewable energy</p>	<p>Whilst the Department notes the benefits raised by the submissions in support of the project it does not note the lack of detail and/or evidence provided in comparison with a number of objecting submissions.</p> <p>How many of those who wrote submissions in support of the project are currently, or expecting to, benefit financially by its approval and construction?</p> <p>The Department also fails to acknowledge the more negative aspects of the submissions lodged as comments by members of the public.</p>

including improvements to energy security. 47. Submissions commenting on the project raised queries regarding consultation, property value, compensation for impacts to visual amenity and cumulative impacts to rural communities.”	
<u>Assessment Overview</u>	
“55. The Department acknowledges that being located within the CWO REZ, the project has the potential to contribute to some cumulative impacts in the region.”	<p>The project RTS states that “as outlined above, the Project is strategically located within the CWO REZ, being an area identified by the NSW Government as suitable for renewable energy projects. As a result, it is expected that there will be cumulative visual impacts due to the number of wind and solar projects proposed in the CWO REZ, however, each project will be required to minimise its impacts and implement appropriate mitigation measures.”</p> <p>Are there any cumulative impacts that the Department considers cannot be mitigated? What impacts are too much for the local communities to bear?</p> <p>Members of affected local communities, project neighbouring landowners and those impacted by transport routes, transmission lines requiring compulsory acquisition, potential bushfire risk and limitations to fire fighting, the change of the regions’ scenic farmland to an industrial landscape, the risk of negative impacts on water sources and flooding/erosion can all be “adequately mitigated” according to the Department of Planning. Has the Department adequately considered the impacts to the people behind these concerns? The generational farmers who know their land better than anyone, and could not bear to live anywhere else? Community members who have lived in the area for 70 or 80 years, and have seen the best and worst of nature yet still choose to care for their land and produce food and fibre for the general population? Locals who have selflessly risked their lives to save both human and animal lives, and the environment, during the most devastating natural disasters?</p> <p>In the event that the IPCn determines approval of the Spicers Creek Wind project, following the Department of Planning’s recommendation of approval, who will be accountable for any negative impacts responsible for a loss of income that have been previously raised by concerned local community members, deemed by the consent authorities as mitigatable?</p> <p>Spicers Creek Wind Response to Submissions document states on page 195: “Between 2024 and 2026 there is a significant overlap between the proposed construction phases of projects in the CWO REZ (refer to Figure 4.4) and during this time there would be significant demands for accommodation, labour and employment within the region.”</p> <p>The same document then states the following on page 211:</p>

	<p>“Based on the available information at the time of preparing the EIS, a large number of these projects are not anticipated to have overlapping construction periods with the Project.”</p> <p>Could the IPCn commissioners please consider the above contradiction given the Department of Planning clearly failed to do so?</p>
Energy Transition	
<p>“57. The project aligns with a range of national and state policies, which identify the need to diversify the energy generation mix and reduce the carbon emissions intensity of the grid while providing energy security and reliability (see section 3.2).”</p> <p>“59. The ISP also forecasts that there will be a demand for 83 GW of utility-scale wind and solar in the NEM by 2034-35, and 127 GW by 2049-50. It highlights the importance of the resource diversity that will be opened up by the State’s REZ network, providing an even mix of wind and solar across the State, noting that wind and solar have complementary daily and seasonal profiles. The project would therefore contribute to replacing the loss of coal-fired generation in the State as well as providing diversification of the generation profile.”</p>	<p>The Energy Australia website states the following regarding solar two-way charging:</p> <p>“Two-way charging is a two-way solar tariff for residential and business solar customers. It’s designed to:</p> <ul style="list-style-type: none"> • encourage customer to use the electricity they generate rather than exporting it to the grid, when too much solar is sent back to the grid and/or, • encourage customers to export excess energy generated at times when it’s needed the most. <p>The electricity grid was originally designed for us to receive energy to our home and businesses, but now we also export energy from rooftop solar back to the grid. In the next decade, the number of homes and businesses in Australia with rooftop solar systems, batteries and electric vehicles will increase. This has resulted in a strain on Australia’s electricity grid that was not designed to send electricity two ways. This means the way we manage exporting excess solar energy back to the grid needs to change.</p> <p>In 2021, the Australian Energy Market Commission (AEMC) identified we need to support the integration of rooftop solar more efficiently into the electricity grid. One solution is the introduction of two-way charging.”</p> <p>The Australia Institute’s Policy Brief No. 21 states, “Between January 2000 and June 2009, the Australian Government ran a program that provided rebates to householders and owners of community-use buildings who acquired PV energy systems. Originally called the Photovoltaic Rebate Program (PVRP), it was rebranded the Solar Homes and Communities Program (SHCP) after a change of government in November 2007. Like similar programs in other countries, the official objectives of the PVRP-SHCP were to:</p> <ul style="list-style-type: none"> • promote the uptake of renewable energy; • reduce greenhouse gas emissions; • help in the development of the Australian PV industry; and • increase public awareness and acceptance of renewable energy. <p>By the end of May 2010, the PRVP-SHCP had supported the installation of 107,752 PV systems across Australia with a combined installed capacity of 128MW. The vast majority (107,081) of the installed systems were for residential users. For much of the PVRP-SCHP’s life, it was of a modest size, supporting the installation of around 1,400 systems and 1.8MW of peak capacity a year. However, in its final 18 months, the program experienced exponential growth. Between January 2000 and December 2007, there were 13,538 successful applications, or around 1,700 a year. In the final 18 months of the program, there were over 94,000. Ultimately, this level of public demand was unsustainable and it led to the program’s demise. Facing a substantial blowout in costs, the Australian Government terminated the program on 9 June 2009.”</p> <p>According to the Australian Governments Department of Climate Change, Energy, the Environment and Water “as of 31 October 2023, over 3.5 million rooftop solar PV</p>

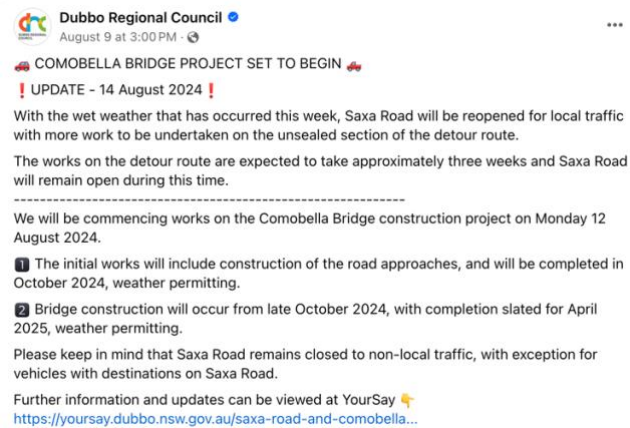
	<p>systems have been installed nationwide, which the Clean Energy Regulator estimates is over 1 in 3 Australian homes.”</p> <p>Australian home owners and businesses have spent the last 20 plus years being persuaded to install rooftop solar systems in the name of reducing greenhouse gas emissions and being environmentally friendly yet, now that the implications of such an energy generation system have been realised ie. too much power being generated during peak sun hours, and not enough during peak energy demand periods, those who have installed solar panels are being punished by the implementation of a “two-way solar tariff”.</p> <p>If there is too much energy being fed back into the grid from household and business rooftop systems during peak sun hours, which are the same for large-scale solar projects, why is the government investing in schemes to make large-scale renewable energy generation projects viable?</p>
<u>Biodiversity</u>	
<p>“132. Overall, the Department considers that the biodiversity impacts of the project are acceptable, subject to the implementation of the recommended conditions and offsetting the residual biodiversity impacts of the project.”</p>	<p>The Biodiversity Offset Scheme allows the devastation of habitat providing existing ecosystems are protected to equalize the destruction. It is my belief that mature trees should have to be replaced by other mature trees ie. prior to destroying one hectare of mature trees there should be one hectare of trees planted, and let mature to the same state as those being removed, not locking trees up that are already contributing to ecosystems.</p>
<u>Visual</u>	
<p>“138. The Department also notes that the site selection and efforts from Squadron to resolve issues through project design and neighbour agreements has significantly reduced the potential for visual impacts such that there are three non-associated receivers within the black line.”</p>	<p>The Department Assessment Report states “7. The area surrounding the project site is sparsely populated by neighbours with large land holdings. There are four non-associated residences located within 3.4 km (the black line) of a proposed turbine location.”</p> <p>The above is a very clear contradiction to point 138. Are there three or four non-associated residences within the black line?</p>
<p>“144. As shown in Table 10, the project would meet all the visual performance</p>	<p>Whilst the assessment of large-scale wind energy generation projects is undertaken in accordance with the current guidelines it must be noted that they do not adequately protect communities and landowners who value the natural, scenic landscapes in their region.</p>

<p>objectives in the Visual Bulletin for all receivers. The Department is satisfied that the project is suitable for the site and would not result in any significant visual impacts on the surrounding non-associated receivers.”</p> <p>“159. As Squadron lodged the development application for this project prior to the nearby projects, the applicants of the nearby projects would be required to include a cumulative impacts assessment with the EIS having regard to existing and approved energy projects located in proximity to their projects, in accordance with the Visual Bulletin and the SSD Guidelines.”</p>	<p>The Visual Bulletin states that “scenic quality refers to the relative scenic or aesthetic value of the landscape based on the relative presence or absence of key landscape features known to be associated with community perceptions of high, moderate or low scenic quality. This can be determined through community perception surveys and consultations using an objective frame of reference. It is both a subjective and complex process undertaken by experts in visual impact assessment, taking into account community values identified in early community consultation.”</p> <p>One of the most common matters raised in submissions objecting to the project was, according to the Department’s Assessment Report, “visual impacts on surrounding landscape and residences, including shadow flicker”.</p> <p>Have there, to date, been any ‘community perception surveys’ carried out within the CWO REZ with regard to scenic quality? Without this knowledge, how can SQE, or the Department and IPCn gauge, and adequately quantify the visual impact such a project will have on the region?</p> <p>The Spicers Creek Wind RTS states that “... the LVIA indicates that regionally, significant landscape features would remain dominant features of the landscape and it is unlikely the Project would degrade the scenic value of these landscape features. While that is currently the case based on the projects approved or proposed at the time of preparation of the LVIA, it is acknowledged that future projects may have further impacts. Each of those projects will be required to assess the cumulative visual impact with the Project and be assessed on their merits.”</p> <p>Should local community members be appeased with an ‘unlikely’ degradation of the scenic value? Will there be any recompense for the residents of the area if the unlikely degradation becomes reality? Who will be responsible for making such an assessment – local people who value the area?</p> <p>Given the scope of proposed projects within the area is it acceptable that Spicers Creek Wind should be given more leniency with regard to cumulative visual impacts due only to the fact the project is further along in the planning stages?</p>
<p>“166. The Department undertook an assessment of the visual impacts associated with the project’s ancillary infrastructure, and considers the project’s ancillary infrastructure is unlikely to have a significant visual impact given there are existing transmission lines and agricultural infrastructure in the area, the location of</p>	<p>The Visual Bulletin states that “vegetation screening, or the planting of trees and shrubs, to visually screen wind turbines or other potential visual impacts from view may be an option for selected viewpoints. However, this mitigation option should not be the first that is considered. A key reason for this is that visual impact issues often cause conflicts between the community or individual residents and the proponent’s proposed wind energy project, and people value landscapes and particular views of the landscape. Vegetation screening can potentially remove such views.”</p> <p>Squadron Energy’s Response to Submissions states “mitigation measures (including screen planting) have been recommended for the non-associated dwellings with a potential moderate visual impact rating. These measures are expected to significantly reduce the level of visual impact once established.”</p> <p>What mitigation measures, other than the potential offer of a neighbour agreement which instead of decreasing the impact just provides monetary compensation, did Squadron Energy attempt to implement prior to the suggestion of vegetation screening?</p> <p>The LVIA states “in addition to the proposed wind turbines, the associated infrastructure (as described in Section 3.4 of this report) is likely to contrast with the existing visual landscape. Due to the large scale and elevated siting of the proposed</p>

<p>ancillary infrastructure away from non-associated receivers, the intervening topography and vegetation, and Squadron's proposed landscape treatments and selection of ancillary infrastructure components of low visual contrast."</p>	<p>wind farm, access roads, transmission lines and other ancillary structures have the potential to alter the existing visual landscape. An overview of the potential visual impact resulting from associated infrastructure and project components is provided in this section of the report."</p> <p>Powerlines in existence throughout the Spicers Creek/Elong Elong area, and more generally throughout the region, are commonly distribution lines (typically a single cement or wooden pole approximately 10-15m in height). The overhead transmission line proposed for the project is "up to 330kV", towers for which are typically 50m high. A line of this size also requires a 60m wide cleared easement. How can the Department make the comparison between the existing powerlines and agricultural infrastructure, which can only be assumed to be sheds, silos, windmills etc (none of which are remotely close in size to 50m high transmission towers) and suggest this as reasoning for an insignificant visual impact to the region?</p>
<p>"169. Squadron's LVIA included a Shadow Flicker Assessment, which concluded that the proposed layout would achieve the recommended limit of 30 hours per year at all non-associated receivers. 170. Notwithstanding, the Department has recommended conditions requiring Squadron to ensure that shadow flicker from turbines does not exceed 30 hours per annum at any non-associated receiver. 171. Blade glint is addressed through Squadron's commitment to using subtle colours and low-reflectivity surface treatment on turbines."</p>	<p>Squadron Energy's Response to Submissions states "one non-associated dwelling (SL002) was identified in the EIS with potential shadow flicker for 28 hours and 10 minutes per year, however this does not exceed the Bulletin recommendation of 30 hours per year. It is noted that this dwelling is associated with the Cobbora Solar Farm. No other non-associated dwellings are predicted to be impacted by shadow flicker."</p> <p>What is the relevance of the residence referred to above, SL002, being associated with the Cobbora Solar project?</p> <p>As a sufferer of migraine and chronic headache it is my belief that shadow flicker and blade glint would both be detrimental to my health, and the health of anyone with a condition triggered or exacerbated by visual and noise stimuli.</p> <p>According to the organisation Migraine and Headache Australia common triggers of migraine include sensory triggers - bright/flickering lights, strong smells and loud/jarring sounds. How will Squadron adequately address any adverse impacts on residents in the area found to be suffering from the impacts of shadow flicker, regardless of the number of hours every year it is a problem? What if a person suffers injurious affects whilst working on their property, not in their residence, as a result of Spicers Creek Wind shadow flicker?</p> <p>Whilst Squadron has committed to using "subtle colours and low-reflectivity surface treatment on turbines" what will be the consequence/s if blade glint is found to be a problem at any residence in the area?</p> <p>It is interesting to note migraine triggers as indicated by Migraine and Headache Australia:</p> <ul style="list-style-type: none"> • heightened emotions – stress is the most common emotional trigger but arguments and excitement can also trigger a migraine attack • sleep – lack of sleep and oversleeping can both be triggers • changes in environment – travel, altitude, weather (especially changes in barometric pressure) <p>Stress and a lack of sleep are associated with contentious large scale energy generation projects. The latter is a potential impact of wind turbines as stated in Squadron Energy's RTS document "while research efforts in this area are increasing, the assessment of potential micro-climate impacts from wind farms is still limited, however it is important to recognise that the build-up of CO2 in the atmosphere due to the burning of fossil fuels has global and long-term impacts, whereas impacts from</p>

	<p>wind farms are mostly local and short-term (absent when turbines are turned off). Also, wind turbines do not produce any heat but simply vertically redistribute the heat that is already in the atmosphere, which is fundamentally different from the large-scale cumulative greenhouse warming effect due to increasing greenhouse gases. Renewable wind energy reduces greenhouse gas emissions and thus mitigates global warming.”</p> <p>How will Squadron Energy protect vulnerable community members from adverse health impacts? How will adversely affected community members access assistance?</p> <p>Measurements of shadow flicker are only taken from residences – is it acceptable that a farmer, working in their cattle or sheep yards should be exposed to more than 30 hours per year of shadow flicker? Considering the nature of working stock, and their adverse reactions to shadow and shade at times it is insulting to think this has not been considered for the local landowners.</p>
<p>“176. The Department has recommended conditions requiring Squadron to install aviation hazard lighting in accordance with CASA recommendations and in a manner that minimises any adverse visual impacts.”</p>	<p>The Spicers Creek Wind Landscape and Visual Impact Assessment was prepared by Moir Landscape Architecture Pty Ltd, commissioned by Spicers Creek Wind Farm Pty Ltd. It found that “night lighting of turbines and associated infrastructure has the potential to extend the visual effect into the night time. Aviation hazard lighting has the potential to be visible from distances in excess of 20km (Scottish Natural Heritage, 2017).” “Dark sky is a valued quality of the rural landscape, due to the lack of light pollution. Aviation lighting has the potential to impact on receptors who view the landscape at night, in particular night-sky enthusiasts, photographers, star gazers, campers and some land owners with potential visibility of the turbines hub.”</p> <p>Whereas, the RTS states “provided that appropriate design principles are incorporated into the night lighting the LVIA found that it is likely there will be no material visual impacts on the existing night time landscape.”</p> <p>Has Squadron Energy accurately represented the Moir Landscape Architecture Landscape and Visual Impact Assessment in the Response to Submissions document?</p>
<p>“177. The Department is satisfied that the project would not result in significant visual impacts on surrounding non-associated receivers. The project is suitable for the site, would meet the visual performance objectives in the Visual Bulletin and would not materially alter the landscape.”</p>	<p>The project RTS states that “it is acknowledged that WTGs can create an unavoidable level of visibility and contrast with the natural environment in which they are situated (DPE, 2016).”</p> <p>And “the LVIA found that it is inevitable that the placement of large scale WTGs in a rural landscape will alter the existing landscape character of the area to some degree. It is undeniable the Project would become a feature of the visual landscape, however, the LVIA found that it is likely the character of areas which are valued for their high landscape quality and utilised for recreation and tourism will remain intact. The LVIA also found that regionally, significant landscape features would remain dominant features of the landscape and it is unlikely the Project would degrade the scenic value of these landscape features.”</p> <p>Interestingly, the LVIA states “the fact that the proposed wind turbines are generally positioned within a landscape that has remained largely unchanged for decades means that the potential for contrast is significant. This is little doubt that the project, regardless of how visible it actually is, would become a feature of the area.”</p> <p>Also stated in the RTS is: “in addition to the proposed wind turbines, the associated infrastructure (including access roads, transmission lines and other ancillary structures) is likely to contrast with the existing visual landscape.”</p> <p>Are all of the above statements enough to suggest to the Department that there will be significant visual impacts?</p>
Traffic & Transport	

<p>“179. The construction of the project would involve the delivery of large plant, equipment and materials to site including by oversized and over-mass (OSOM) vehicles and heavy vehicles requiring escort which has the potential to impact the local and regional road network.”</p>	<p>The Response to Submissions document states the following:</p> <p>“Night transport for OSOM vehicles is generally available along the major road network outside urban areas (between 1 am and sunrise or 6 am, whichever is earlier).</p> <p>Transport through any urban areas (eg. Dunedoo, Merriwa) generally occurs during daylight periods. It is a general requirement that if the transport routes pass through any school zones or adjacent to any schools, transport also be restricted to outside school drop-off and pick-up times (8:00 am to 9:30 am and 2:30 pm to 4:00 pm) to prevent conflicts with these activities.”</p> <p>As community members we have always been led to believe, even during intense questioning given the knowledge of previous project transport, that OSOM loads would be transported through Merriwa and Dunedoo overnight. How will the townships of Merriwa and Dunedoo be adequately prepared to manage large numbers of OSOM loads? What compensation will the towns receive for this inconvenience and potential for increased accident/incident risk?</p> <p>Squadron’s RTS states that “current 2022 traffic volumes along the minor local road network (e.g. Sweeneys Lane, Tallawonga Road, Bingenbar Road and Ben Hoden Road) were not surveyed due to the local nature of the roads (property accesses only), their very minor use and local road closures at some of the locations at the time of the surveys. All these minor access roads are characterised by the ‘closed’ nature, being part of the local rural road network, which results in minimal through traffic flows as well as the limited number of properties that they serve. It is estimated that the average daily traffic along these minor roads is a maximum of approximately 20 vehicles per day.</p> <p>Additional traffic counts are not considered warranted for the minor local road network given the low traffic volumes on these roads.”</p> <p>Traffic volumes for minor local roads are extremely important given the proposed major increase in traffic flow. Will non-associated local road users be compensated for the inconvenience of the use of the otherwise quite, rural roads? How will local road user safety be guaranteed by Squadron Energy?</p>
<p>“184. The Department notes that EnergyCo has committed to facilitating road upgrades to the State road network between the Port of Newcastle and CWO-REZ.”</p>	<p>The RTS states the following: “Assorted lay-by areas/rest stops along the designated OSOM and heavy vehicle transport route (Golden Highway) will be utilised to ensure OSOM vehicles do not restrict traffic flow during any bus operation periods.”</p> <p>Specifically, which ‘lay-by areas/rest stops’ along the Golden Highway will be utilised? The majority of existing rest areas along the Golden Highway would not have sufficient expanse to accommodate loads of the length required for turbine blades.</p>
<p>“187. The main increase in project related traffic would occur during the 40 month construction period, with a peak period of approximately 6 months for the construction of</p>	<p>Spicers Creek RTS states that “it is acknowledged that, on occasions, local traffic will be inconvenienced however the management measures within the CTMP would endeavour to mitigate impacts as far as practicable.”</p> <p>How, exactly, will impacts to local traffic be mitigated? On Wednesday, 4th September I drove along the Twelve Mile Road, Wuuluman which is currently undergoing major road work to prepare for the Uungula Wind project construction. The inconvenience for local road users is enormous and in my opinion unmitigable.</p>

foundations and delivery of WTG components.”	
<p>“189. Operational traffic is expected to be minimal, with up to 40 light vehicle movements per day, associated with maintenance and monitoring activities.”</p>	<p>Squadron Energy’s Response to Submissions states that “once operational, the Project would be monitored both by on-site staff and through remote monitoring.”</p> <p>“Maintenance staff will be on-site throughout the year, making routine checks of the WTGs on an ongoing basis. Major planned servicing would be carried out approximately twice a year on each WTG.”</p> <p>“Replacement of major components, such as WTG blades, may require the use of cranes and ancillary equipment.”</p> <p>Does the operational traffic count include transport requirements for the aforementioned replacement of major components? How often are blades replaced and what are the traffic implications of such maintenance works?</p> <p>The Response to Submissions also states that “traffic generation during operations would be minimal resulting in a general maximum of up to approximately 40 trips per day. Consequently, traffic and road network impacts would be negligible during the operational phase.” Whilst 40 trips on a large road network would be considered negligible a 200% increase on current traffic counts is enormous. Can Squadron Energy guarantee the safety of local road users given the increase in traffic for the wind project operation?</p>
<p>“190. Squadron assessed the traffic impacts of the project in the traffic assessment prepared as part of the EIS. Squadron later provided an updated traffic assessment that accompanied the Submissions report. Squadron assessed the impacts of the project on the intersections and levels of service of the proposed transport routes. The assessment concluded that the levels of service along the rural road network (Golden Highway, Saxa Road, Gollan Road) during the peak construction period would only be marginally reduced, with most roads in the rural road</p>	<p>Squadron Energy’s RTS states “Saxa Road, between the Mitchell and Golden Highways, was closed to all traffic except local residents on 5 October 2022 due to several large pavement failures which made the road dangerous. It is understood that Dubbo Regional Council’s Infrastructure Delivery team is planning to undertake temporary repairs on the Comobella Bridge, which are programmed to take place in February 2024 at this stage (Dubbo Regional Council, 2023), at which time Saxa Road will be able to re-open to all traffic. Construction for the Project is not expected to commence prior to Saxa Road being re-opened and SQE will continue to liaise with Dubbo Regional Council regarding the status of the road.”</p> <p>At the time of writing this submission, 6th September 2024, Saxa Road remains closed to non-local traffic. According to the Dubbo Regional Council website “construction of Saxa Road, between the intersection with Wongajong Lane and Comobella, Road is set to commence on Monday, 9 September 2024.”</p> <p>Please see Facebook post below.</p> <div data-bbox="405 1563 1037 1989">  <p>Dubbo Regional Council August 9 at 3:00 PM · 🌐</p> <p>COMOBELLA BRIDGE PROJECT SET TO BEGIN 🚧</p> <p>! UPDATE - 14 August 2024 !</p> <p>With the wet weather that has occurred this week, Saxa Road will be reopened for local traffic with more work to be undertaken on the unsealed section of the detour route.</p> <p>The works on the detour route are expected to take approximately three weeks and Saxa Road will remain open during this time.</p> <p>-----</p> <p>We will be commencing works on the Comobella Bridge construction project on Monday 12 August 2024.</p> <p>1 The initial works will include construction of the road approaches, and will be completed in October 2024, weather permitting.</p> <p>2 Bridge construction will occur from late October 2024, with completion slated for April 2025, weather permitting.</p> <p>Please keep in mind that Saxa Road remains closed to non-local traffic, with exception for vehicles with destinations on Saxa Road.</p> <p>Further information and updates can be viewed at YourSay 🗨️ https://yoursay.dubbo.nsw.gov.au/saxa-road-and-comobella...</p> </div> <p>What if the Saxa Road repairs are not complete prior to construction of the Spicers Creek Wind project?</p>

<p>network having significant spare capacity and ability to absorb increased traffic numbers during construction.”</p>	
<p>“199. Traffic modelling indicates the Golden Highway has sufficient capacity to accommodate construction and operational traffic associated with the project as well as potential cumulative traffic impacts if concurrent construction were to occur with surrounding State significant projects in the region.”</p> <p>“200. Squadron has committed to working with EnergyCo, other projects and road authorities to coordinate transport planning, including scheduling of construction activities and deliveries for the project in consideration of other projects using the same road network, so that any overlap is suitably managed.”</p>	<p>The Golden Highway Road Corridor Improvements Business Case was developed by The Stable Group on behalf of RDA Orana and was published in March 2024. The document states “RDA Orana is a not-for-profit association governed by a regional Board consisting of industry and government representatives whose primary focus is to promote economic development in the Orana region. The Orana Region is the largest and most diverse region in New South Wales, covering 25% of its area and serving a population of over 123,000 people. The main service centre in the region is Dubbo and it is the western starting point of the Golden Highway which is an essential corridor between the Orana Region and the Port of Newcastle and beyond. The Golden Highway (B84) is a 314 km highway and critical corridor which provides a fairly low altitude crossing of the Great Dividing Range. The Golden Highway commences at the intersection with the Newell Highway in Dubbo and heads in an easterly direction through Dunedoo where it is concurrent with the Castlereagh Highway for approximately 10 kms then through Merriwa, Sandy Hollow, Denman, Jerry’s Plains and Mount Thorley where it terminates at the intersection with the New England Highway before Belford. The highway is subject to higher rates of casualty crashes (those where at least one person sustains a minor injury) than the NSW average. In comparison to the surrounding State roads, the Golden Highway has a lower AADT, necessitating a review of the safety concerns along the highway. The Stable Group, a very strong and trusted team of skilled professionals committed to creating change in Regional Australia, undertook the Orana Hunter Connections and Beyond - Golden Highway Transport Study, a desktop assessment and review of past studies and data on current freight flows and the performance of existing infrastructure. Previous studies on freight network, infrastructure and transport were reviewed to gather data before conducting stakeholder consultation across the region. Extensive consultation with a range of stakeholders including the Port of Newcastle, road users including freight and rail industries, and a Project Reference Group (PRG).</p> <p>Following this extensive process, it was identified that:</p> <ul style="list-style-type: none"> • In NSW the Central West and Northwest regions are of critical importance as significant generators of Gross State Product. Logistics costs ex-farm gate and ex-mine are highly dependent on reliable and resilient transport networks that provide as direct access to ports as possible. The relevant networks are the Blue Mountains (A32 and Main West Rail) and in combination, the Golden Highway (B84) and part of the Hunter Rail network. • The Golden Highway Corridor (GHC) in conjunction with the Hunter Expressway (M15) facilitates the movement of export commodity flows to Newcastle, and the inbound flow of goods and services across the region. It carries a relatively high proportion (30%) of heavy vehicles. It features very few overtaking lanes, narrow (some very narrow) bridges and inadequate intersections. It should serve as a relief route to and from Sydney when the Great Western Highway/Mitchell Highway is unavailable. • Economic activities between the Orana and Hunter regions continue to expand beyond previous growth estimates.

- With many significant infrastructure projects planned in the Orana Region and developments at the Port of Newcastle, the projections are for this to grow at a greater rate in years to come.
- Without upgrades, the GHC faces significant challenges, including congestion due to restricted overtaking lanes, safety concerns, and inadequate capacity.
- No prior substantial wholistic study has encompassed the entire GHC and highlighted the growth and emerging opportunities across multimodal and intermodal interfaces.”

And the following “The implementation of projects within the Central-West Orana Renewable Energy Zone (CWO-REZ) necessitates the transportation of not only personnel but also substantial components for renewable energy infrastructure from the Port of Newcastle. These components, such as wind turbine parts and transmission transformers, constitute crucial elements of the renewable energy projects in the region. However, the transportation of such oversized and over-mass items is poised to have significant repercussions on vehicular movements along the Golden Highway, extending beyond mere logistical concerns.

The shift to renewable energy requires transportation of personnel, equipment and machinery along the GHC. Overall, the actual number of small vehicle and standard truck movements will have minor impacts on the Golden Highway level of service but inherently alters the dynamics of traffic flow and road safety along the transportation route. The nature of these movements introduces unique challenges. Oversize and over-mass vehicles, by their very dimensions and weight, impose restrictions on conventional traffic patterns, necessitating adjustments and accommodations from other drivers sharing the road. For example, the components, including parts for wind turbines and transmission transformers, will be transported using oversize and over-mass (OSOM) vehicle movements. Expected movements by vehicle type per month for a 70 wind turbine generator (WTG) project being constructed over 24 months would result in an approximate increase of 130 vehicle movements per day of which 3 or 4 would be OSOM. It is assumed there will be a limit on the number of windfarms that could be in construction at any point in time given supply chain constraints related to workforce availability, component manufacture in addition to port receipt and outturn capacity.

As these massive components traverse the highways en-route to project sites, they inevitably disrupt the flow of regular traffic, potentially causing delays and congestion. Furthermore, the presence of OSOM vehicles poses heightened risks for accidents and collisions, given their increased size, reduced manoeuvrability, and slower acceleration and deceleration rates compared to standard vehicles.


Moreover, the introduction of such OSOM vehicles into the transportation network may inadvertently encourage risky driving behaviours among other motorists. Faced with delays and congestion caused by the movement of these massive components, drivers might resort to aggressive manoeuvres or unsafe overtaking practices in a bid to mitigate travel delays, thus exacerbating the overall risk profile along the Golden Highway.”

As a landowner with a property split by the Golden Highway, I have been trying to explain the constraints of the Highway to EnergyCo for more than 18 months – it has fallen on deaf ears to date. It will take years to upgrade the Golden Highway to a state able to facilitate the transport needs of the CWO REZ as currently proposed. I implore the IPCn commissioners to take a deep dive into the Golden Highway as the transport route for the Spicers Creek Wind project and question EnergyCo on its plans and timing for the proposed upgrades.

	<p>If EnergyCo does not facilitate the upgrades needed for transport of components of the Spicers Creek Wind project, will Squadron Energy be financially able to complete the necessary upgrades, and in what timeframe?</p>
<p>“202. Subject to the recommended conditions, the Department is satisfied that the project would not result in significant impacts on road network capacity, efficiency or safety. 203. The Department considers the proposed transport routes could be appropriately upgraded to facilitate the transportation of large turbine components to the site. The road upgrades proposed have been developed in consultation with the relevant roads authorities, noting that the final road upgrade works would be subject to detailed design and approval of the road asset manager and/or relevant road authority prior to the implementation of these works or would be upgraded as part of the works to facilitate the renewable energy zones.”</p>	<p>The following excerpts have been taken from RDA Orana’s Golden Highway Road Corridor Improvements Business Case.</p> <p>“Where a prima-facie case is not evident to warrant an overtaking lane investment, some other factors could be considered:</p> <ul style="list-style-type: none"> • Narrow Seal. Car drivers are reluctant to overtake large vehicles on roads with narrow seal width. On sections of road where this is the primary factor contributing to excessive queuing behind large vehicles, the provision of occasional overtaking lanes may be a more cost-effective solution than general seal widening. The Golden Highway is generally of narrow seal pavement. • Crash History. An investigation of crash history may help to decide on marginal cases for improvement. For overtaking lanes, particular attention should be paid to crashes associated with overtaking manoeuvres or where crashes may be attributable to slow moving vehicles. • Percentage of Heavy Vehicles. Construction of passing lanes (sic) should be considered on roads with more than 15% heavy vehicles as defined by Austroads Class 3 and greater. The Golden Highway traffic comprises approximately 30% heavy vehicles. <p>On the Golden Highway, safety performance is assessed as marginal due to a combination of narrow pavements, poor ride quality and a significant lack of overtaking opportunities. This situation is exacerbated by a number of very narrow bridges.</p> <p>Apart from some short sections of recent reconstruction, pavement condition is generally poor; not only due to the flooding rains of 2022 but also to the rising proportion of heavy vehicles in total traffic and the increased mass of many heavy vehicles since the road was designed. High heavy-mass frequency and wet conditions invariably cause pavement damage.</p> <p>Major road reconstruction and maintenance in NSW after the 2022 weather events has consumed all of maintenance budgets and most of grant funds released by governments.</p> <p>Current pavement condition generates significant oscillation in higher and heavier vehicles thus increasing the kinematic envelope beyond that underpinning the assumptions adopted for road and bridge design. This is a safety issue.</p> <p>Road maintenance is generally underfunded in NSW. This situation is exacerbated by severe weather events, where urgent repairs have the effect of disrupting planned maintenance and upgrades. Repairs may be classified as minor routine maintenance or short section reconstruction, such as would be necessary if the subgrade requires reforming.</p> <p>Sectional reconstruction can be expected to cost approximately \$0.7 million per kilometre for generally flat to undulating terrain. This cost rises sharply with larger culverts and water crossings. The average rate per km would change slightly downwards for larger sections and more sharply upwards for shorter sections.</p> <p>Provision for Over Size Over Mass (OSOM) on GH is confined to Class 9 vehicles (B doubles or equivalent). Renewable energy projects approved for the region and in development will generate a strong demand for OSOM movements with few if any route alternatives.</p> <p>Suggested scope of work to improve function and performance include:</p> <ul style="list-style-type: none"> • Bridge widening - 4 large bridges (>20m deck length), 11 smaller bridges.

	<ul style="list-style-type: none"> • Overtaking lanes - 33 lanes total, 17 eastbound, 16 westbound • Improve 7 intersections. • Improve 4 rail level crossings. • 1 bypass of Denman, Including construction of one new bridge” <p>Given the above information – will Squadron Energy be liable for any accident caused by, or involving, employees, contractors or project components on the Golden Highway?</p>
Noise & Vibration	
<p>“Squadron’s NIA predicts that noise impacts associated with the project, including consideration of low-frequency noise, would comply with the operational noise criteria for all non-associated receivers.”</p> <p>“In consideration of the above, the Department considers the noise impacts associated with the project are acceptable.”</p>	<p>How many Squadron Energy, Department of Planning and/or IPCn staff are currently, or will in the future, be forced to live in the vicinity of wind turbines?</p> <p>Whilst classed as anecdotal, many people living near these enormous structures suffer from a lack of sleep, often leading to stress, anxiety and depression.</p> <p>Can Squadron Energy guarantee no landowner or community member will have health difficulties relating to the noise impacts of the Spicers Creek Wind project?</p> <p>A neighbouring landowner of Bodangora Wind has recently put their generational farm on the market after years of suffering following the construction of the neighbouring wind project. The impacts of these projects are real and devastating to locals who raised these issues prior to planning approval, but had them dismissed. Will lessons be learnt from previous mistakes made during the planning process?</p>
Agriculture	
<p>“The site is mostly comprised of Class 3 (42%) (moderate capability), Class 5 (45%) (moderate-low capability), and Class 6 (12.6%) (very low capability), and Class 7 (0.4%) (very low capability) land. The disturbance footprint comprises Class 3 (39%) (moderate capability), Class 5 (50%) (moderate-low capability), and Class 6 (11%) (very low capability) land. Squadron would seek to minimise disturbance to areas</p>	<p>Whilst minimal disturbance to the highest land class in the project site is welcome I believe the Department of Planning and IPCn needs to do more investigation into the land classification system and the soils under each category.</p> <p>Lower class land is said to be less agriculturally productive, but it is also more prone to degradation, erosion, sedimentation and salinity issues. Disturbing lower class land can be detrimental to the whole area.</p> <p>Can the IPCn commissioners please investigate the potential impacts of disturbing lower class land to ensure there will be no major degradation of the entire project site?</p>

of Class 3 land as far as practicable.”	
<p>“The development and operation of a wind farm can co-exist with grazing activities. Upon project decommissioning, the land would be rehabilitated. As such, the project would not compromise or significantly diminish the availability of land for primary production purposes within the project site or surrounding LGAs.”</p>	<p>Squadron’s RTS states “During the construction and operation periods it is proposed that agricultural activities will be maintained within the Project Site as the design is compatible with ongoing agricultural land uses on these properties, including sheep and cattle grazing.</p> <p>Once a wind farm is operational, it is highly compatible with agricultural operations. Livestock grazing and cropping can continue right up to the edge of all turbines, hardstands and access tracks. The Project will allow ongoing sustainable primary industry practices and provide diversity in primary industry enterprises appropriate to the area.”</p> <p>Will any landowners be forced to destock during construction given the need for fences to be taken down for the purpose of accessibility for construction equipment? How will paddocks within properties and boundaries with other properties be maintained during this time? Has Squadron Energy, or any independent body, conducted studies to ensure there are no adverse impacts on animal fertility or general livestock health as a result of the addition of large scale renewable energy infrastructure to the landscape?</p> <p>The Squadron Energy RTS states that “the construction of the on-site road network and hardstand areas would result in an approximate 154 km length of access road construction and 117 hardstand areas (one per wind turbine). Assuming an average 6.0 m wide road formation and 200 mm depth of material for the on-site road network as well as hardstand dimensions of 30 m x 50 m x 300 mm thick, almost 237,000 m³ of material would be required... Importation of road base / gravel material from off-site is likely to occur over 24 months. Based on an average 15 m³ capacity for ‘truck’n’dog’ transport, some 15,800 loads would be required to be transported to the site resulting in 31,600 heavy vehicle trips over the 24 months. This equates to a maximum of approximately 60 heavy vehicle trips per day and 8 heavy vehicle trips per hour during peak periods.”</p> <p>Given the compaction caused by large construction machinery and heavy loads can Squadron Energy guarantee all areas will be rehabilitated adequately following decommissioning? Where will top soil excavated during construction be stored to reuse following decommissioning or will soil be brought in for rehabilitation purposes? How will Squadron Energy ensure strict biosecurity if the latter is the case?</p>
Water Supply	
<p>“Squadron confirmed that it is unlikely that the project would intercept an aquifer given the depth to groundwater across the majority of the site is in excess of 20m. Despite this, it is noted that depth to groundwater on the lower slopes of the site, in particular in close proximity to waterways, has been</p>	<p>Squadron must be conditioned so it is not just “unlikely” that the project would intercept an aquifer. Underground water is the lifeblood of agriculture and any incident causing negative impacts to groundwater could devastate a large area.</p>

recorded at between 0.5 and 4m below ground level and there is some potential interception of groundwater if excavation were to occur in these areas.”	
<u>Erosion and Sedimentation</u>	
<p>“The site includes areas with highly erodible and potentially dispersive soils. The steep gradients across parts of the site, along with the infrastructure that would cross streams (e.g. access tracks and cables) further add to the potential for erosion of soils and the subsequent water quality impacts in surface water resources.”</p>	 <p>The above photo shows Sandy Creek as an example of the potential for erosion in the area. It is almost impossible to remediate areas like this following events that cause erosion and sedimentation. Squadron Energy must be held to account so as not to cause any soil erosion issues in the area.</p>
<u>Bushfire risk</u>	
<p>“The development site is mapped as bushfire prone land by the RFS. Squadron would be required to establish Asset Protection Zones around each wind turbine, wind monitoring masts, compound for the operation and maintenance facilities, including substations, in compliance with relevant guidelines.”</p>	<p>The RTS states “the Project Site will be appropriately maintained over the life of the Project including vegetation and site maintenance required to maintain APZs.”</p> <p>And “vegetation across the Development Footprint will also be managed to appropriately reduce fuel loads (grassed areas mowed regularly, ground debris removed, trees maintained as required).”</p> <p>What constitutes ‘appropriate’ maintenance over the entire project site? Will Squadron Energy be responsible for the whole of project site maintenance?</p>
<p>“Squadron has committed to compliance with the</p>	<p>The RTS states that “in relation to aerial access for fire fighting purposes, the Australasian Fire and Emergency Service Authorities Council Limited (AFAC) has developed a national position on wind farms in relation to bushfire prevention,</p>

<p>RFS's <i>Planning for Bushfire Protection 2019</i> and the preparation of an Emergency Management Plan to manage fire risks. Squadron has also committed to a number of mitigation measures and strategies, including the provision of on-site water supply for firefighting purposes, and appropriate bush fire emergency and evacuation plans."</p>	<p>preparedness, response and recovery which is set out in the Wind Farms and Bushfire Operations (2018) guideline. SQE will prepare and implement a Bushfire Emergency Management Plan as part of the implementation of the Project building on the commitments already made regarding fire safety, ensuring that appropriate on-ground bushfire controls are in place for the Project recognising the potential local limitations associated with aerial fire fighting within the area occupied by the wind farm."</p> <p>AFAC's Wind Farms and Bushfire Operations Guideline Version 3.0 (2018) states "wind farms may result in aerial firefighting limitations due to aerial obstacles created by wind turbines and meteorological monitoring towers. The bushfire at the Waterloo wind farm demonstrated that if conditions are clear and wind turbines are turned off, wind turbines are clearly visible from aircraft and are not likely to constrain aerial firefighting operations (Clean Energy Council 2017). However, during this event transmission infrastructure, meteorological towers and guy-ropes were difficult to see (Clean Energy Council 2017); this infrastructure does have potential to limit the effectiveness of aerial firefighting operations. Access and egress challenges on the ground as well as water supply issues can also create firefighting limitations, if not planned for appropriately. Wind farms can also impact response operations by interfering with local and regional radio transmissions (Australian Wind Energy Association 2004a).</p> <p>Turbine towers, meteorological monitoring towers and power transmission infrastructure pose risks for aerial firefighting operations. Meteorological monitoring towers and power transmission infrastructure are generally difficult for aerial personnel to see, if they are not marked appropriately. If wind turbines were not shut down, moving blades and wake turbulence would create significant hazards for low flying aircraft, thus the shutting down of wind turbines, in an emergency situation, is defined in wind farm emergency procedures. A wind farm facility's power lines may pose electrocution risks, that are exacerbated due to smoke during a bushfire."</p> <p>Although, to date, the RFS has not raised any issues regarding aerial fire fighting limitations it is broadly acknowledged in rural areas that large scale renewable energy infrastructure projects WILL impact fire fighting operations. Without aerial assistance ground fire fighting crews will be in more danger.</p> <p>What are the safety regulations around fighting fires within wind project sites?</p>
<p>"The Department is satisfied that the bushfire risks can be suitably controlled through the implementation of standard fire management plans and procedures."</p>	<p>Squadron's RTS states "Access will be controlled by locked gates or similar."</p> <p>Given the above, how will fire fighting crews access the project site in the event of a bushfire emergency?</p>
<p><u>Accommodation</u></p>	
<p>"While the project alone is not expected to result in a significant population change across the Dubbo Regional or Mid Western</p>	<p>The SQE RTS states "as a host LGA for the Project, Warrumbungle Shire has the potential to experience moderate accommodation and employment impacts and opportunities.</p> <p>Warrumbungle Shire has a smaller population than Dubbo Regional with limited capacity to supply labour and services. Despite this, opportunities and impacts will have a larger effect due to the smaller population and scale of concurrent major projects in that LGA."</p>

Regional LGAs, it is likely that the concurrent construction workforces from projects in the CWO REZ may result in cumulative impacts across LGAs.”	Was a potential population change in the Warrumbungle Shire Council considered by the Department? There are no regional cities located within the Warrumbungle Shire LGA to adequately cater for large increases in population. Given the saturation of projects clustered around the town of Dunedoo the Warrumbungle region should be adequately scrutinized in regard to cumulative impacts on accommodation.
“The Accommodation and Employment Strategy identifies that, with the implementation of either of these additional options, there would be sufficient accommodation for the project construction workforce.”	Squadron’s Response to Submission states “the AES has identified capacity for up to 50 beds of short-term accommodation in Dubbo Regional LGA to be used by Project workforce on any given night without negatively impacting tourism and other accommodation users.” Was there adequate consultation with the Dubbo community and business owners prior to making the above assertion? I have spoken to numerous people who have travelled to Dubbo recently and have had issues finding accommodation at short notice.
<u>Social & Economic</u>	
“Accordingly, the Department considers that the social and economic benefits of the project outweigh the negative social and economic impacts. As such, the project is in the public interest.”	The project RTS states that “the proposed Planning Agreement for the Project is intended to compensate for environmental, social, and economic costs associated with the Project as to not put an unreasonable onus on the residents and ratepayers of the LGA.” I was under the impression the Planning Agreement payments were a bonus for “hosting” the project within the area – a thank you of sorts for the region assisting the state to transition to renewable energy. Is infrastructure that should be provided as part of paying rates to the Council enough of an incentive given the onus that is being placed on this region? Should the benefits not be more substantial considering the region is being expected to bear the brunt of the renewable energy projects to power metropolitan areas?
<u>Aviation Safety</u>	
“Squadron undertook an assessment of aviation impacts. The assessment concluded that the project would not have any adverse or significant impacts to air safety, subject to the implementation of mitigation measures and administrative controls.”	According to the Response to Submissions “... the AIA concluded that based on the risk assessment, it has been concluded that there will be an acceptable level of aviation safety risk associated with the potential for an aircraft collision with the WTGs or wind monitoring tower (WMT), without obstacle lighting on the WTGs and WMTs of the Project. As discussed above, SQE has made additional commitments in relation to the lighting of turbines in response to the CASA submission. With the addition of obstacle lighting, the risk of collision would remain acceptable.” What is considered “acceptable” when it comes to the risk of aircraft collision? How many deaths, serious injuries or near misses, constitutes an “unacceptable risk? Where does the liability lie if there is an aircraft collision involving a wind turbine or WMT tower – is it with the Applicant or the host landowner? The RTS also states that “... the AIA indicates that the presence of a wind farm would likely prevent aerial application operations in that particular area, but safe aerial application operations would still be possible on other parts of properties within the Project Site and neighbouring the Project Site.

	<p>The use of helicopters enables aerial application operations to be conducted in closer proximity to obstacles than what would be possible with fixed wing aircraft due to their greater manoeuvrability. The AIA does not make any judgement in relation to the use of helicopters, including the effectiveness or costs.”</p> <p>The first statement is quite contradictory. What is the difference between the “particular area” and “other parts of properties within the Project site”? What size exactly is the “particular area” in which aerial operations would be prevented by the wind project?</p> <p>Will Squadron Energy bear any increase in cost for non-associated neighbours, or landowners in the district, forced to engage helicopters for aerial activities as opposed to fixed wing aircraft? And, any increase in cost due to the necessitation of further safety procedures required as a result of the introduction of large scale infrastructure to the district?</p>
<p>“RFS did not raise any concerns about the project, however recommended that the wind farm is obstacle lit, and for blade rotation to cease when arial firefighting is occurring in the locality. The Department has recommended a condition to this effect.”</p> <p>“With these conditions, the Department is satisfied that the project is unlikely to result in any significant aviation hazards.”</p>	<p>How many pilots will need to be seriously injured or killed before no aerial firefighting assistance is allowed within areas containing wind turbines, especially REZ’s considering the saturation of some areas with renewable energy infrastructure, high voltage transmission lines included?</p> <p>I urge the IPCn to research the number of American Agricultural pilots being killed in accidents involving wind turbines and associated infrastructure.</p> <p>It is my understanding that the NSW Rural Fire Service does not employ any pilots; all pilots responsible for flying aerial fire fighting sorties are contractors. Please see letter below from a business who contracts to the RFS for aerial fire fighting purposes.</p> <div data-bbox="403 1137 786 1220" data-label="Image"> </div> <div data-bbox="403 1258 786 1451" data-label="Text"> <p style="text-align: center;">EAGLE HELICOPTERS PTY LTD</p> <p style="text-align: center;">11th April 2024</p> <p>To whom it may concern:</p> <p>I David Bird acting as Managing Director and Chief Pilot of Eagle Helicopters.</p> <p>Since this statement is a directive to all staff Aircrew that whilst performing in aerial firefighting activities do not at any one time enter any wind farm where there are, static or rotating blades at any time enter the windfarm to conduct aerial fire fighting duties.</p> <p>This directive is issued forthwith of the publication of this letter.</p> <p>Justification of this Company directive</p> <p>That in the event of a fire in the windfarm it is and would be deemed that at no time can or could we 100% guarantee the safe removal of fire from the windfarm, that would allow operations to be conducted in a safe manner in regard to any incursion with blades towers whilst the effect of both the smoke creates a limited view of the working area.</p> </div> <p>Will areas like the CWO REZ have any pilots willing to risk their lives fighting fires aerially within wind turbines and/or high voltage transmission lines? What will a significant reduction in aerial fire fighting assistance mean for the protection of rural homes, properties, lives and environment? Who will be held responsible for such measures being discontinued in the area to assist ground fire fighting efforts?</p>
Radiocommunication	
<p>“Electromagnetic signals transmitted for telecommunication</p>	<p>The project RTS states that “since the EIS was finalised, SQE has been working with telecommunication suppliers to deliver reliable internet bandwidth through a fixed wireless, point to point network across the region. The offering will be deployed and supported professionally by local consultants and technicians.</p>

<p>systems (such as radio, televisions, mobile phones and mobile/fixed radio transmitters) function most efficiently where a clear line of sight exists between the transmitting and receiving locations. Wind farms and other infrastructure have the potential to cause interference with this line of sight.”</p>	<p>The network coverage area is planned to provide access to as many customers as possible within 20 km of the Project Site.</p> <p>The timeframe for the program has yet to be finalised, but SQE is aiming to have this service available in 2025, if not sooner. This service is intended to be the first of many ‘Squadron Link’ services to be provided to those living in and around SQE’s project sites.”</p> <p>What about those impacted by the transport of components to Squadron’s project sites? What telecommunication benefits will they see?</p> <p>The Telecommunications Industry Ombudsman’s Submission to the 2024 Regional Telecommunications Review in July 2024 states “through our complaints data, we are uniquely placed to offer insights into the issues being experienced by telco consumers. Between 1 July 2021 to 30 June 2024, we received 51,854 phone and internet complaints from consumers living in regional, rural, and remote Australia (collectively referred to as regional throughout this submission). The complaints to our office show that regional consumers are impacted by faults, poor service quality, poor mobile service coverage, outages, and accessibility barriers. The consequences of a lack of access to reliable telco services can be greater for regional consumers, who face additional challenges in having a fault repaired or gaining access to an alternative service. We also understand these issues are likely to be the tip of the iceberg, with recent research commissioned by the TIO showing that forty-six percent of Australians who experienced a telco challenge in the past 12 months did not lodge a complaint. 1 In some of our complaints, we see consumers let down by a lack of obligations for certain service types, or obligations that apply to parties that consumers do not have direct relationships with. Consumers across Australia, and particularly in regional Australia, need to access and rely on quality telco services that enable them to participate in everyday life.”</p> <p>As discuss above, the decrease in telecommunication service in rural and regional areas is no secret. Given the extra traffic, and risk, being placed on the region as a result of projects such as Spicers Creek Wind would it not be reasonable to expect an increase in service to enable connectivity in the event of an accident?</p> <p>I recently put in a complaint to Telstra regarding the decline in service and the outcome is below. It seems congestion is the issue and there are no planned tower upgrades in the area. How will our mobile service fair considering the potential increase in population during the construction of projects like Spicers Creek Wind?</p> <p>Dear Emma,</p> <p>Complaint Reference: [REDACTED]</p> <p>Thank you for getting in touch with us on 8 July 2024 about a complaint relating to your Telstra account [REDACTED]</p> <p>I'm sorry we haven't been able to reach an agreement by offering the following:</p> <ul style="list-style-type: none"> • Congestion is detected affecting one or more primary serving cells at the specified address. Performance impacts may be experienced. Some congestion is detected on one or more cells the specified mobile service frequently accesses. Performance impacts may be experienced • No tower upgrades are planned or have been recently completed at this address • Advised that cases like this concerning a network congestion, only a tower upgrade can help with the network performance, however unfortunately, we are unable to provide a timeframe as to when this will commence • Advised of external options, but you mentioned that the area is serviceable only by Telstra • Offered to have fixed service to keep up with their means of communication, but you declined • Set expectations that since we are unable to provide a timeframe for a tower upgrade, you can decide whether or not you will keep her service with Telstra. In line with that, as once off adjustment we can offer a 6-month plan adjustment to her account amounting to [REDACTED] This is the last adjustment that we can offer, moving forward, you will be held liable for your monthly costs • Given that we are unable to provide a timeframe for a tower upgrade, advised that we will close case as unresolved. <p>You have told me that this doesn't meet your expectations as you are still encountering concerns with the mobile service.</p> <p>While it's disappointing that we were unable to resolve your complaint, we are confident that our investigation and proposed resolution are appropriate. As a result, I've recorded these details and closed the case.</p> <p>You may wish to discuss our resolution offer with the Telecommunications Industry Ombudsman (TIO), however if at any stage you decide to accept, please call me on 1800 241 787 quoting your complaint case number [REDACTED]</p>
--	--

	Has there been any investigation into the potential impacts of wind turbines and associated infrastructure on GPS signals? Will Squadron Energy be made responsible for any interference caused by the wind project and be required to rectify any impacted GPS system immediately, at their cost?
<u>Subdivision</u>	
“The subdivision would create new lots that would not meet the minimum lot size for land use zone RU1-Primary Production and are therefore prohibited under a strict reading of the Warrumbungle LEP and Dubbo Regional LEP.”	I request, as a ratepayer of the Warrumbungle Shire Council, that DPHI and the IPC take a strict reading of the Warrumbungle LEP as I believe the document was intended.
“The Department is satisfied that the proposed subdivisions are in the public interest, as they would allow the wind farm to be development and consequently provide net benefits to the National Electricity Market that can be realised in a timely manner.”	
<u>Waste</u>	
“Noting the above, the Department considers that the waste generated by the project could be appropriately managed.”	How often will turbine blades be replaced? Where will any wind turbine components, replaced during construction or operation, be disposed of?
<u>Decommissioning and rehabilitation</u>	
“With the implementation of these measures, the Department considers that project infrastructure would be suitably decommissioned,	<p>Squadrons Response to Submissions states “at the end of its operational life, should the Project be decommissioned...”</p> <p>Does that statement suggest Spicers Creek Wind Farm Pty Ltd is not planning on decommissioning the project?</p> <p>Current NSW Premier, Chris Minns, stated the following after questioning from The Hon. Robert Borsak during the Budget Estimates Hearing on Wednesday 21st February 2024:</p>

<p>either at the end of the project life or if the project is not operating for more than a year, and the site appropriately rehabilitated to a standard that would allow the ongoing productive use of the land.”</p>	<p>“The Hon. ROBERT BORSAK: Mr Premier, on something totally different, what is your Government doing around decommissioning of renewable energy projects like solar and wind farms when they reach the end of their useful life?</p> <p>Mr CHRIS MINNS: That is something that needs to be considered as part of land use changes, particularly for private landholders that assess a proposal from a renewable energy provider. The Government, I understand, has released a calculator so that the landholder has the complete knowledge of what the projected end costs associated with remediating the land would be once the solar project or the wind project has come to the end of life. It's obviously important for the landholders to have that information, because I think that the up-front fee that people receive for hosting or using renewable energy sites on their land is important but they need to know the full picture. If decommissioning is part of that, they've got to be remunerated for it.</p> <p>The Hon. ROBERT BORSAK: Yes, that's exactly right. Obviously there are a lot of projects already operational and installed. I think in most cases bonds haven't been paid or there's no money put aside, and a lot of these wind companies and solar companies may well not be there. Do you think the Government will end up having to pick up the tab?</p> <p>Mr CHRIS MINNS: No. Obviously best practice is that it's reflected in the original price paid to the owner of the property—remediation costs are part of the price, whether it's the yearly fee paid to the landholder or some kind of up-front payment. Where the Government can come in and provide clarity to the land user is to give them the calculator and the information that they need.”</p> <p>Given that the leader of the NSW Government believes landowners will ultimately be responsible for decommissioning of large scale renewable energy projects how will the Department and IPCn guarantee the Spicers Creek Wind project will be decommissioned as required, even if the owner/operator of the project defaults financially?</p>
<p><u>Blade throw</u></p> <p>“The Department considers that blade throw risk is acceptable, subject to Squadron’s commitment to ensure residences GH005 and TR001 remain vacant for the life of the project.”</p>	<p>Is it acceptable that any non-associated or public property will be subject to the risk of blade throw? I believe to make every effort to combat this risk, Squadron Energy should be conditioned to not place any turbine within a distance of non-associated, or public property (ie.roads) where blade throw could be a hazard. For example, if debris from blade throw incidents is known to be found 1km from the turbine tower, no turbine should be placed within 1km of the project boundary, or within 1km of public property.</p>
<p><u>Cumulative impacts</u></p> <p>“Cumulative traffic impacts during the construction phase are a key issue with development within the CWO REZ. The Transport Assessment found that there is ample spare capacity on the local road network for the proposed</p>	<p>Cumulative traffic impacts within the CWO REZ are an enormous issue that is yet to be adequately addressed by the infrastructure planner, EnergyCo, or any project proponent. Through my own research, due to the information not being publicly available, I have found that 11 projects in the CWO REZ, out of approximately 40 in the planning process (ie. not yet operating), would create an additional 7058 traffic movements per day (4,588 (65%) light vehicles, 26 shuttle buses and 2,444 (34.6%) heavy vehicles). That is an average of 641 trips per day per project. If you multiply that by the 40 projects (although, granted, they will not all be under construction concurrently and not all will use the same roads – but most heavy vehicles will originate at the Port of Newcastle and use the Golden Highway) that is equal to more than 25,000 traffic movements per day throughout the CWO REZ, and I</p>

<p>project, however some upgrades to the local network are required. Squadron has committed to undertake these works in consultation with the relevant roads authorities. These upgrades will improve traffic conditions on the broader road network and provide sufficient capacity for cumulative traffic. The Transport Assessment also found that the Golden Highway has ample spare capacity to cater for estimated future traffic volumes.”</p>	<p>believe this is a conservative estimation given the projects still not yet publicly announced.</p> <p>The CWO REZ transmission project EIS technical paper 13 – traffic & transport assesses the following roads as described below:</p> <ul style="list-style-type: none"> - Golden Highway (near Spring Ridge Road) – bi-directional two lane road (one lane in each direction), ADT = 1,282, lane capacity (vph/lane) = 1,800 - Bald Hill Road – unsealed, bi-directional two-lane road (one lane in each direction), 100km/h (rural speed limit) <p>1,800 vehicles per lane per hour is one vehicle per second on the road – is that safe when you consider the limitations stated in the Golden Highway Business Case, especially the combination of narrow pavements, poor ride quality and a significant lack of overtaking opportunities?</p> <p>The current 2022 traffic volumes in the updated traffic assessment conducted by Samsa Consulting on behalf of the Applicant states that there are 960 vehicles per day on the Golden Highway east of Saxa Road (and 102 vehicles per peak hour), 23% of which are heavy vehicles. Interestingly, the Golden Highway Corridor Strategy document states “average daily traffic (ADT) volumes along the Golden Highway vary in the rural sections from around 5,000 at the eastern end to around 11,000 east of Broke Road, 3,000 at Denman, 1,600 west of Merriwa and 1,500 west of Dunedoo. In the urban centre of Dubbo the average daily traffic volume exceeds 20,000 vehicles per day. The percentage of heavy vehicles along the corridor ranges from 19-21% west of the New England Highway at Belford and east of Dunedoo, decreasing to 12% near Broke Road and Dubbo where there is a higher volume of commuter traffic associated within mining areas and the urban centre of Dubbo, respectively. Annual traffic growth of 2% (linear) has been recorded at the eastern end of the corridor due to the strength of the mining sector, whilst the remainder of the corridor has experienced steady annual growth of between 1-2% (linear).” Who carried out the traffic count surveys undertaken during mid-August 2022 used to compile the Samsa Consulting report for the Spicers Creek Wind project? Has their accuracy been verified?</p> <p>As a landowner who has lived my whole life on a property divided by the Golden Highway (in fact the double Golden/Castlereagh Highway) I have witnessed first hand the enormous increase in traffic over the last 20 years and as a consequence the issues we have walking livestock and machinery across the road – it is an almost daily management issue. There is no way the Golden Highway can handle 1,800 vehicles per lane per hour without causing absolute carnage and mayhem. Could the IPCn please research the implications of the cumulative impacts of the CWO REZ, this project included, on the length of the Golden Highway being used as a transport route for large scale renewable energy infrastructure projects?</p> <p>The photos below show Bald Hill Road – as stated above, it is classified as bi-directional with a speed limit of 100km/h by EnergyCo. This is just one example of the misleading classification being undertaken of rural roads to justify the extra traffic that will be a result of the CWO REZ construction, operation and decommissioning.</p>
---	---



Evaluation

“214. The Department considered the submissions made through the exhibition of the project and the issues raised by the community and agencies during consultation. These matters have been

The below table, titled “Consideration of community views” is located in Appendix G of the Departments Assessment Report. I note the Departments “consideration” does not directly address the concerns raised by the public with regard to community division and community health and wellbeing, unless it is being suggested that the potential monetary benefits will mitigate these impacts? How will these concerns be addressed? What will Squadron Energy do to combat and manage community division and health and wellbeing?

<p>addressed through changes to the project and the recommended conditions of consent.”</p>	<p>Table G-1 Consideration of community views</p> <table border="1"> <thead> <tr> <th>Issue</th><th>Consideration</th></tr> </thead> <tbody> <tr> <td>Socio-economic</td><td>Impact assessment</td></tr> <tr> <td> <ul style="list-style-type: none"> Community division Community health and wellbeing Property devaluation Reduced housing affordability </td><td> <ul style="list-style-type: none"> Concerns about socio-economic impacts were raised in 23 public submissions, particularly regarding community division, health and property devaluation. The project would generate up to 590 construction jobs of which approximately 10% will be sourced from the surrounding LGAs and 10 operational jobs. The project's net economic stimulus is estimated at approximately \$410 million over 30 years of operation, relating to operational wages, host agreement and neighbourhood agreement payments, and community benefit sharing program payments and land tax revenue to Council. The project's construction phase is likely to generate approximately \$310 million in wages, contracts and other service provision for the local area's economy over the 40-month construction period. Squadron has committed to enter a Voluntary Planning Agreement (VPA) with Dubbo Regional Council and Warumbungle Shire Council. The total contribution payable is 1.5% of the CIV of the final layout of the project based on the number of committed turbines within each Council's LGA. The VPA will support the provision and maintenance of local infrastructure and community groups; and The project will power approximately 370,000 homes per year, equivalent to approximately 12% of homes in NSW. The Land and Environment Court has ruled on several occasions that the assessment of the impacts of projects on individual property values is not generally a relevant consideration under the EP&A Act, unless the project would have significant and widespread economic impacts on the locality, which is not the case in this instance; </td></tr> </tbody> </table>	Issue	Consideration	Socio-economic	Impact assessment	<ul style="list-style-type: none"> Community division Community health and wellbeing Property devaluation Reduced housing affordability 	<ul style="list-style-type: none"> Concerns about socio-economic impacts were raised in 23 public submissions, particularly regarding community division, health and property devaluation. The project would generate up to 590 construction jobs of which approximately 10% will be sourced from the surrounding LGAs and 10 operational jobs. The project's net economic stimulus is estimated at approximately \$410 million over 30 years of operation, relating to operational wages, host agreement and neighbourhood agreement payments, and community benefit sharing program payments and land tax revenue to Council. The project's construction phase is likely to generate approximately \$310 million in wages, contracts and other service provision for the local area's economy over the 40-month construction period. Squadron has committed to enter a Voluntary Planning Agreement (VPA) with Dubbo Regional Council and Warumbungle Shire Council. The total contribution payable is 1.5% of the CIV of the final layout of the project based on the number of committed turbines within each Council's LGA. The VPA will support the provision and maintenance of local infrastructure and community groups; and The project will power approximately 370,000 homes per year, equivalent to approximately 12% of homes in NSW. The Land and Environment Court has ruled on several occasions that the assessment of the impacts of projects on individual property values is not generally a relevant consideration under the EP&A Act, unless the project would have significant and widespread economic impacts on the locality, which is not the case in this instance;
Issue	Consideration						
Socio-economic	Impact assessment						
<ul style="list-style-type: none"> Community division Community health and wellbeing Property devaluation Reduced housing affordability 	<ul style="list-style-type: none"> Concerns about socio-economic impacts were raised in 23 public submissions, particularly regarding community division, health and property devaluation. The project would generate up to 590 construction jobs of which approximately 10% will be sourced from the surrounding LGAs and 10 operational jobs. The project's net economic stimulus is estimated at approximately \$410 million over 30 years of operation, relating to operational wages, host agreement and neighbourhood agreement payments, and community benefit sharing program payments and land tax revenue to Council. The project's construction phase is likely to generate approximately \$310 million in wages, contracts and other service provision for the local area's economy over the 40-month construction period. Squadron has committed to enter a Voluntary Planning Agreement (VPA) with Dubbo Regional Council and Warumbungle Shire Council. The total contribution payable is 1.5% of the CIV of the final layout of the project based on the number of committed turbines within each Council's LGA. The VPA will support the provision and maintenance of local infrastructure and community groups; and The project will power approximately 370,000 homes per year, equivalent to approximately 12% of homes in NSW. The Land and Environment Court has ruled on several occasions that the assessment of the impacts of projects on individual property values is not generally a relevant consideration under the EP&A Act, unless the project would have significant and widespread economic impacts on the locality, which is not the case in this instance; 						
<p>“215. Importantly, the project would assist in transitioning the electricity sector from coal and gas-fired power stations to low emissions sources and is consistent with the goals of the NSW's <i>Climate Change Policy Framework</i> and the <i>Net Zero Plan Stage1: 2020-2030</i>. It would have a generating capacity of 700MW of clean electricity, which is enough to power approximately 370,000 homes.”</p>	<p>I find it very interesting that part of the Departments justification of project includes transitioning the electricity sector from gas-fired power stations. Squadron Energy already has planning approval for Dubbo Firming Power Station – a firming generation facility able to supply electricity at short notice operating on gas and biofuel, and has another company called Dunedoo Firming Nominees Pty Ltd suggesting could be another firming power station within the CWO REZ.</p> <p>Is it acceptable to use transitioning away from gas fired power stations as justification for the Spicers Creek Wind project following approval of a new gas fired power station within the CWO REZ, and with the potential for another going through the planning process?</p> <p>From the RTS: “The Project is expected to produce in excess of 2000 GWh of electricity per annum, at full production at a capacity factor of 33%. The calculation for the homes powered is based on the Australian Energy Regulator's NSW household consumption rate of 5.172 MWh/annum.”</p> <p>SQE advertises project is “expected to power” 397,000 homes – “clean energy to power around 12% of all NSW homes”.</p> <p>There is a contradiction between the Departments expectation of homes powered compared to the proponents advertisements?</p> <p>According to the federal government Clean Energy Regulator website “the Renewable Energy Target (RET) is an Australian Government scheme that aims to reduce greenhouse gas emissions in the electricity sector and increase renewable electricity generation.” “The RET creates a market to incentivise the generation and use of renewable energy.” Each large scale generation certificate (LGC) represents one megawatt hour of renewable energy and acts like a share that can be traded to gain a financial benefit, or used by the company for carbon neutrality or renewable energy purposes. For example, if Squadron Energy's proposed Spicers Creek Wind project is approved, and generates the expected 2 million megawatt hours of energy per annum, the developer would have approximately \$90 million worth of large scale generation certificates to sell or trade each year, based on today's prices.</p> <p>In the history of Australia, have any other heavily subsidised industries ever stayed the course? Is this the answer to a sustainable, reliable and affordable energy system or just a money making scheme for big business – is this the real driving force behind large scale renewable energy projects such as Spicers Creek Wind?</p>						

<p>“216. The inclusion of a BESS would enable the project to store energy for dispatch to the grid when the wind isn’t blowing and/or during periods of peak demand, increasing grid stability and energy security.”</p>	<p>Power from large scale lithium-ion batteries can be rapidly deployed and scalable which offers advantages in managing the intermittency of renewable energy sources like solar and wind energy.</p> <p>However, lithium-ion batteries pose inherent risks due to their potential for thermal runaway. The consequences of a battery fire within a BESS can be severe, resulting in substantial property loss, contamination of surroundings and a significant interruption to operations. The nature of these fires also can result in firefighting challenges (traditional fire-fighting methods are mostly inadequate for lithium ion battery fires which are usually left to burn out necessitating substantial volumes of water for cooling surrounding plant to avoid spread resulting in toxic runoff that must be managed to avoid environmental damage), interruption losses (downtime caused by BESS fires has been known to lead to significant financial losses and resuming operations often requires extensive remediation efforts and regulatory approvals), difficulty in determining the cause of the fire (the intense heat of the fires often destroys physical evidence and requires specialist knowledge of battery systems prolonging the investigation process) and specialised disposal of debris (the aftermath of a lithium ion battery fire involves specialist protocols for handling and disposing of hazardous debris).</p> <p>How will the Applicant guarantee the safety of local residents, personnel expected to protect the area in the case of an emergency and the environment with regard to the potential risks posed by a battery energy storage system?</p>
<p>“218. Overall, the Department considers that the project achieves an appropriate balance between maximising the efficiency of the wind resource development and minimising the potential impacts on surrounding land uses and the environment.”</p>	<p>The following was taken directly from the RTS:</p> <p>“While research efforts in this area are increasing, the assessment of potential micro-climate impacts from wind farms is still limited, however it is important to recognise that the build-up of CO2 in the atmosphere due to the burning of fossil fuels has global and long-term impacts, whereas impacts from wind farms are mostly local and short-term (absent when turbines are turned off). Also, wind turbines do not produce any heat but simply vertically redistribute the heat that is already in the atmosphere, which is fundamentally different from the large-scale cumulative greenhouse warming effect due to increasing greenhouse gases. Renewable wind energy reduces greenhouse gas emissions and thus mitigates global warming.”</p> <p>Firstly, how much research into the assessment of potential micro-climate impacts from wind turbines has been carried out in Australia? Whilst I acknowledge Squadron Energy believes that the impacts from wind projects are “mostly local and short-term”, are there safeguards in place to ensure there will be no adverse impacts to the local region, especially for those landowners who object to the project following the construction of the wind turbines in the Spicers Creek Wind project?</p>
<p>“219. On balance, the Department considers that the project is in the public interest and is approvable, subject to the recommended conditions of consent (see Appendix E).”</p>	<p>The Response to Submissions states that “SQE has no authority in relation to the draft guidelines. Regardless, in relation to the Project:</p> <ul style="list-style-type: none"> • SQE has attempted to be a model proponent • there is not significant opposition to the Project • the Project is considered to be in the public interest.” <p>I do not believe a “model proponent” would create a neighbour agreement worthy of potential class action (according to the former AEIC) due to its terms nor leave a whole community, especially one closest to the project, off the list for public consultation.</p> <p>I believe 85% of public submissions objecting to the project is “significant opposition”. If only submissions from people living within 50km of the project site are considered there were objections from 68% - that is two in three people who</p>

	<p>are opposed to the project. What is the threshold for “significant” when measuring project opposition?</p> <p>What does the term “in the public interest” really mean? Are the 57 members of the public who have objected to the Spicers Creek Wind project considered adequately under the term “public interest”? Are the landowners and farmers who have already had and will have their lives, families, homes, businesses and environment adversely impacted by the project considered adequately under the term “public interest”? Is it really acceptable to place the entire burden of energy generation on rural and regional areas, and have the people who provide the country with food and fibre make all of the sacrifices, to service metropolitan areas and deem it for the “greater good”?</p>
--	--

Other issues

Emergency evacuation of workforce from site

Squadron Energy’s Response to Submissions states that “buses will leave the subject wind farm construction site for other transport operations once they have dropped off the construction staff in the morning. Buses will then return to pick-up construction staff to transport them back to the temporary accommodation.” In the event of an emergency (ie. bushfire or flooding) how will construction staff be safely evacuated in a timely manner if the buses responsible for worker transport have left the project site? And, in the event that workers are able to be evacuated, where will they be evacuated to (noting that evacuation back to their accommodation facility in Dubbo may not be possible depending on the emergency situation)?

Community Consultative Committee

It is a recommended condition of consent that there be a Community Consultative Committee operated for the development. According to the Department’s Community Consultative Committee Guideline: State Significant Projects (2023) “the proponent must properly consider and respond to issues raised by committee members.” If approval of the project is granted how long will the proponent be granted to publish the request for expressions of interest for community and stakeholder representatives? I note there is a four week minimum for EOI requests, followed by six weeks given until the Planning Secretary appoints the representatives yet no timeframe outlined for the proponents initial role in the process. It is important that the CCC be formed as soon as possible. The CCC guidelines also state “the committee may seek annual or one-off funding from the proponent to help it perform its functions. While community and stakeholder group representatives, as volunteers, are not eligible to receive sitting fees from the proponent, they may seek reimbursement for out-of-pocket expenses (such as personal protective equipment for a site visit). The proponent should support any reasonable requests for funding or expenses, where representatives give appropriate reasons and evidence of the costs. If the proponent makes a payment, the recipient should declare this as an interest.” Yet again, community members interested in protecting and proactively seeking benefits for their communities in light of the state significant projects being forced upon the region are doing so at their own cost. When will active community members and landowners be sufficiently remunerated, by project proponents, for the time and effort they put in to reviewing and editing large scale renewable energy infrastructure projects so there is as little impact on the region as possible?

Submission from SCWF neighbours to IPCn

I note the supporting submission from the Spicers Creek Wind project neighbours to the IPCn regarding the Spicers Creek case. Is a supporting submission from landowners benefitting financially through a neighbour agreement, especially one obviously organised by the proponent of the aforementioned project, considered by the panel as a conflict of interest? Is it acceptable that the proponent organised the supporting submission (ie. wrote the letter that was then signed by neighbouring landowners)?

Neighbour agreements

I have not personally seen Squadron Energy’s neighbour agreement but I urge the IPCn commissioners to investigate the claims made by a project neighbouring landowner who refused to sign the

agreement offered by SQE. Providing an agreement that prevents local landowners from raising issues/concerns about the project, forces landowners to publicly support the project and takes a caveat over a project neighbouring property does not demonstrate Squadron Energy's claims of being a model proponent. **Why can neighbour agreements not simply be compensation paid to landowners depending on their impacts from the renewable energy project, instead of a contractual agreement?**

Biosecurity

According to the NSW DPI website "biosecurity is the protection of the economy, environment and community from the negative impacts of pests and diseases, weeds and contaminants." **I do not believe there are any stringent enough recommended conditions of consent to protect the local area from biosecurity threats – how will this be managed to protect other landowners in the vicinity of the project? Will Squadron Energy be liable for any biosecurity issues found to be as a result of the Spicers Creek Wind project? Who will be onsite, at all times, to enforce any biosecurity measures implemented to minimise the risk?**

Public liability insurance

There are great concerns from landowners regarding the potential impacts of neighbouring, and inhabiting a district with, large scale renewable energy infrastructure projects. **Will Squadron Energy indemnify any and all external risks if an incident, including a fire event, occurs resulting in any public liability insurance claim?**

Spicers Creek Wind Farm Pty Ltd

Spicers Creek Wind Farm Pty Ltd is an Australian Proprietary Company that was registered on 23rd February 2021. Spicers Creek Wind Farm Pty Ltd had 1000 shares issued with a total value of \$10 – all shares are held by Squadron Energy Onshore Developments Pty Ltd. Squadron Energy Onshore Developments Pty Ltd also had 1000 shares issued with a total value of \$10 – all shares are held by Wind Acquisition 3 Pty Ltd. Squadron Energy Onshore Developments Pty Ltd has the following shares/interests held – Boco Rock Stage Two Pty Ltd, Boorolong Wind Farm Pty Ltd, Squadron Asset Management Pty Ltd, Squadron Renewables Pty Ltd, Guyra Wind Farm Pty Ltd, Hillgrove Wind Farm Pty Ltd, Jeremiah Wind Farm Pty Ltd, Sapphire Battery Company Pty Ltd, Sapphire Solar Farm Pty Ltd, Spicers Creek Wind Farm Pty Ltd, Uungula Solar and Battery Pty Ltd, Saddletop Wind Farm Pty Ltd, Myrtilville Wind Farm Pty Ltd, Dubbo Firming Holding Nominees Pty Ltd, Dunedoo Firming Holdings Pty Ltd, Squadron Vic Holdco Pty Ltd, Koorakee Energy Park Pty Ltd, Illawarra Firming Power Station Pty Ltd, Bookham Wind Farm Pty Ltd, and previously held the following shares/interests – Sapphire Battery Holdings Nominees Pty Ltd, Shannons Flat Wind Farm Pty Ltd, Uungula Wind Farm Pty Ltd.

Given the convoluted company situation can host landowners be guaranteed the Applicant will have the funds available to foot the bill for decommissioning of the Spicers Creek Wind project?

Squadron Energy EOI for qualified contractors

On 26th June 2024 Squadron Energy released the news that they were calling for expressions of interest for qualified contractors for the Spicers Creek Wind project, two months prior to the project being approved by the Department of Planning, Housing and Infrastructure and being referred to the Independent Planning Commission for determination. The article on the Squadron Energy website states "following a strategic alliance with GE Vernova in which Squadron Energy has secured an advance order of wind turbines, Squadron Energy is now calling for expressions of interest for a range of work packages on the Spicers Creek project.

The procurement process will run throughout 2024/25 and pending planning approvals and the outcome of the CWO REZ Access Rights process, work on the project is expected to start in 2025/26."

Whilst I acknowledge preparedness is important to make sure developments occur in a timely manner is it somewhat arrogant to offer expressions of interest for work that is not yet approved? Or, does Squadron Energy know something that the greater community are not aware of regarding the approval of the Spicers Creek Wind project?

Impact on local LGA's

Warrumbungle Shire Council (WSC) covers a large geographical area with a relatively small rate payer base and a large number of staff shortages. The CWO REZ, and its associated infrastructure projects,

has placed a major burden on WSC office staff since its surprise inception. From the 1st of September 2022 to 25th July 2024 WSC expended \$608,120.56 (\$71,358.67 in staff costs and \$536,761.69 in contractor wages) on matters relating to the REZ. Council has received two payments of \$250,000 (in May 2023 and July 2024 - total \$500,000) from EnergyCo to assist WSC in addressing REZ related matters. There are no guarantees WSC will receive any more funding from EnergyCo.

I can only assume it will be expected that funds received by Council from proponents will cover the cost borne by Council due to each project (twelve currently on the Planning Portal requiring research and advice regardless of whether the project will go ahead)? Voluntary planning agreement funds should not be used to cover these costs!

Community consultation

The DPHI referred the Spicers Creek Wind project determination to the Independent Planning Commission on 30th July 2024. As community members, we were notified by Squadron Energy of this referral via email at 12.40pm on 30th July 2024 containing a link to the IPCn case page. There were no details on the IPCn case page until after 2pm on August 2nd when it was announced that the public meeting would be held in Dunedoo on August 29th 2024. Not unlike most dealings with renewable energy proponents, EnergyCo and the DPHI, landowners and community members are informed of dates and times of drop in sessions and meetings, not consulted to determine more suitable dates and times. There are members of the community who would've liked to make a presentation at the public meeting in Dunedoo that had annual standing commitments on the day planned for the meeting. Personally, I made a request to the IPCn that I be allowed to pre record a presentation to be played during the public meeting however my request was denied due to the fact I would not be in attendance on the day.

IPCn Project Site Inspection

I note there were no community members in attendance during the IPCn site visit. Were invitations extended and not accepted?

Was more than one non-associated neighbour offered site inspections with the IPCn commissioners? If not, have the IPCn commissioners gained an accurate view of the project from local landowners?

Community support

An article written by Squadron Energy's CEO, Rob Wheals, on 15th August 2024, available on the SQE website, is titled "Community support for renewables isn't bought, it's earned: 20,000 jobs at stake".

The article states "renewables companies who are genuinely working with the regions, where consulting is a two-way conversation, must share their knowledge with the entire industry. There's nothing that country people hate more than being talked at by folks from the city, while not really being able to decide what's best for them locally. At the same time, the renewable energy industry and Governments at all levels need to do a better job of explaining the vast benefits of the transition to clean energy." **Is this article just lip service or genuine thoughts from the CEO of Squadron Energy who is simply unaware of how on the ground company employees are treating community members and landowners affected by the Spicers Creek Wind project? Is the CEO aware that one community in close proximity to the project, Elong Elong, was not fairly consulted prior to the release and exhibition of the EIS? What are the benefits of the clean energy transition to a landowner being forced to neighbour large scale renewable energy infrastructure?**

The article also says "invest in the heart of a community. It is the small community groups, the charities, the sporting clubs and the Landcare groups that are the soul of each local town, so invest in what they need to build their capacity and ensure they are sustainable long term for the community they're in. Put simply, we must put regional communities at the heart of the opportunity and invest not just the money, but also the time, to ensure these once in a generation benefits are realised and shared across the country." **While I agree with the Squadron Energy CEO that it is important to "invest in the heart of a community", financial benefits alone are not going to assist small regional communities in building the capacity of the town and greater area. Rural communities thrive and prosper when the volunteer base is at its strongest. Large scale renewable energy infrastructure projects, like the Spicers Creek Wind project, are causing angst and division within small towns, tearing their volunteer**

community groups apart, possibly irreparably. How will Squadron Energy assist the rural towns in the CWO REZ, other than monetarily, to repair relationships and community groups to allow the region to thrive and prosper throughout, and beyond, the “rapid transition to renewable energy”?

DPHI Recommended Conditions of Consent

Condition B1.

“(d) The mitigation measures must be implemented within 12 months of receiving the written request, unless the Planning Secretary agrees otherwise.” **Twelve months is a long time for a neighbouring landowner to wait for visual impact mitigation. Could the condition be within 3 months of the landowners written request?**

“Notes:

- To avoid any doubt, mitigation measures are not required to be implemented to reduce the visibility of wind turbines from any other locations on the property other than the residence and its curtilage.” **Why is visual impact mitigation only necessary from a residence and its curtilage? Farmers spend large amounts of their days in the paddocks, visual impact assessment and mitigation should apply to entire properties, not just the residence.**

Condition B4.

“The Applicant must ensure that shadow flicker associated with wind turbines does not exceed 30 hours per annum at any non-associated residence.” **There should be a zero tolerance policy for shadow flicker at any non-associated residence.**

Condition B6.

“The following activities may be carried out outside the hours specified in condition B5 above:

(a) activities that are inaudible at non-associated residences;” **Who decides what activities are considered inaudible at non-associated residences? Who will police the audibility of such works? What will be the consequences if there are out of hours works carried out deemed audible at non-associated residences?**

Condition B8.

“The Applicant must take all reasonable steps to minimise the noise generated by the development during construction, decommissioning and road upgrade works, including any associated traffic noise.”

What are considered “all reasonable steps”? Is the language in this condition enforceable given it is subject to interpretation?

Condition B13. - B16.

Is there noise monitoring assessment carried out at non-associated residences during operation by an independent authority? What is the penalty or consequence of any noise exceedance at a non-associated dwelling?

Condition B17.

“The Applicant must take all reasonable steps to:

- (a) minimise the off-site dust, fume and blast emissions of the development; and
- (b) minimise the surface disturbance of the site.”

Again, this condition uses the wording “all reasonable steps”. This is very ambiguous and needs to be more enforceable.

Condition B20.

“The Applicant must:

- (a) minimise erosion and control sediment generation;
- (d) ensure the concrete batching plants and substation are suitably bunded; and
- (e) minimise any spills of hazardous materials or hydrocarbons, and clean up any spills as soon as possible after they occur.”

Again, the language is not strong enough; although the condition begins with “the Applicant must” thereafter the words used are “minimised”, “suitably” and “as soon as possible”. There must be more rigorous conditions to protect the impacted communities and environment.

Condition B29. & B30.

How will the Applicant ensure that all vehicles associated with the development access the site through the designated routes? Will the general public be expected to police the traffic movements attributed to the project?

Condition B32.

Under the "Timing" column in Table 1 of Appendix 7 all upgrades are conditioned to be completed "prior to use by heavy vehicles requiring escort". EnergyCo is currently responsible for all Port to REZ roadworks. **If EnergyCo does not have the road treatments in Table 1 completed prior to Squadron Energy requiring the use of the roads/intersections will Squadron Energy be obliged to complete the works? Who is responsible for enforcing the timing of and treatments required in this condition of consent?**

Condition B33.

"The Applicant must, in consultation with the relevant Council:"

"If there is a dispute between the Applicant and the relevant council about the repair of the above listed roads, then either party may refer the matter to the Planning Secretary for resolution."

Given there will be an additional workload placed on both Warrumbungle Shire Council and Dubbo Regional Council, will the Applicant provide remuneration to both Councils for any time staff spend in relation to the Spicers Creek Wind project?

Condition B34.

Who will be responsible for overseeing all parts of this condition are enforced, and how often will inspections be carried out by an independent party? In the event of a dispute between a landowner and the Applicant (over, for example, internal road construction and/or maintenance) who will be responsible for finding a resolution?

Condition B35.

Again, given there will be an additional workload placed on both Warrumbungle Shire Council and Dubbo Regional Council, will the Applicant provide remuneration to both Councils for any time staff spend in relation to the Spicers Creek Wind project?

Will the driver's code of conduct address any measures surrounding discipline for any drivers found disregarding designated haulage and transport routes and speed limits, not driving safely, or adhering to driver fatigue policy? Will an independent body be responsible for dealing with any incompliance to ensure transparency?

Condition B45.

"The Applicant must:

- (a) minimise the fire risks of the development, including managing vegetation fuel loads on-site;
- (b) ensure that the development:
 - (i) complies with the relevant asset protection requirements in the RFS's *Planning for Bushfire Protection 2019* (or equivalent) and *Standards for Asset Protection Zones*;
 - (ii) is suitably equipped to respond to any fires on site including provision of a 20,000 litre water supply tank fitted with a 65 mm Storz fitting and a FRNSW compatible suction connection located adjacent to each substation;
 - (iii) is managed as an asset protection zone (including the defendable space);
- (c) assist the RFS, FRNSW, NPWS and emergency services as much as practicable if there is a fire in the vicinity of the site; and
- (d) notify the relevant local emergency management committee following construction of the development, and prior to commencing operations."

How will the Applicant "manage vegetation fuel loads on-site" given the majority of the project site is working farms? Will there be conditions around how much/the length of vegetation/grass allowed to remain on the entire site?

With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for obvious reasons. An average call out for RFS members would see

half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. 20,000L is not enough water to adequately fight, nor black out, even the smallest of fires in rural NSW.

An Asset Protection Zone (APZ) around wind project infrastructure, and the project site, may well assist in protecting those structures from fire, but what/who will protect the surrounding habitat, farming land and communities?

Squadron Energy should be responsible for fire fighting within the vicinity of the site. NSW RFS fire fighters are volunteers, many of whom are objecting to large scale renewable energy infrastructure installations. Fire & Rescue fire fighters, although paid, are local business owners and employees doing their communities a service; they do not need extra call outs, and Dunedoo should not be left without emergency services due to the SQE development. Other emergency services in the region are also stretched; the Spicers Creek Wind project should not be permitted to use any existing local emergency services.

Condition B49.

Exactly how will Squadron Energy have to “consider the cumulative impacts associated with other State significant Projects in the area”? Cumulative impact studies to date with regard to the CWO REZ and “rapid transition to renewable energy” have not adequately considered the impacts on affected landowners and/or communities.

Renewable energy infrastructure projects in the CWO REZ are advertised as benefitting the local workforce. **Is it acceptable that the condition of consent only requires Squadron Energy to “investigate” the “options for prioritising the employment of local workers” not making it an essential prerequisite?**

Condition B50.

Following rehabilitation and revegetation does the proponent have any obligation to the management of the project site? I.e. If a wind turbine pad is, as conditioned, “covered with soil and/or rock and revegetated” but in following years suffers from erosion or subsidence is there any onus on the proponent to repair such damage for a specific number of years or life?

Condition C14.

Does the Applicant have an obligation to notify the broader community/region of the commencement of construction? Is there any required notification for landowners along the designated transport route?

Condition C16.

“(b) keep this information up to date.”

“Up to date” is a very open ended condition. There should be a strict number of days/weeks required in this condition. For example, the condition could read “this information must be uploaded to the Applicant’s website no longer than 7 days following any update”.

Time Invested

The Central West Orana Renewable Energy Zone has brought with it countless concerns and challenges for local community members, business owners and landowners. The time being poured into research, reading, comprehension, submission writing, meetings and attempting to educate community members is phenomenal. Personally, I have put over 2,000 hours into the aforementioned, all voluntarily, in an attempt to understand the potential implications and protect my home, livelihood, community and environment from any negative impacts as a result of large scale renewable energy infrastructure projects. It is frustrating for those of us willing to invest our time that all the people we are dealing with are being paid handsomely for their time, and we are forced to meet their time frames and put aside our lives, at their convenience, to have any chance of questioning or understanding what is proposed for our region.

According to answers provided by the Energy Corporation of NSW, through Supplementary Questions in the Legislative Council’s Inquiry into NSW Government’s Use and Management of Consulting Services, “at the time of writing:

(a) the average annual payment to contractors engaged by EnergyCo is \$202,967.52,

(b) the average daily rate paid to contractors is \$2,267.36 per day (ex GST)”

According to EnergyCo’s Annual Report 2022-2023 average remuneration for an Executive Director is \$352,329 (of which there are 4) and Director’s \$242,943 (of which there are 12). In the 2022-2023 financial year EnergyCo spent a total of over \$48 million on consultants.

I have not had the time to look into Squadron Energy’s financial statements at this time hence the comparison I am drawing with EnergyCo.

Is it acceptable that consultants and employees of renewable energy developing companies are being paid, in some cases, over \$280 per day but community members are expected, if they want to learn anything about any project (and it is here I should remind the commissioners that there are over 50 projects operating, under construction and proposed within the CWO REZ boundary – most in a relatively small geographical area) it is on their own dime?

To this end, I hereby give notice of my intention to invoice Squadron Energy, the Department of Planning, Housing and Infrastructure and the Independent Planning Commission for the 67.5 hours I have put into researching, reading and writing this submission. (Please see invoice below.)

Plans to be completed

Construction Environmental Management Plan (CEMP)
Operation Environmental Management Plan (OEMP)
Decommissioning and Rehabilitation Plan
Aviation Lighting Plan
Bird and Bat Adaptive Management Plan
Biodiversity Offset Strategy
Heritage Management Plan (Aboriginal and Historic Cultural Heritage)
CTMP
Traffic Monitoring Program
Soil and Water Management Plan
Erosion and Sediment Control Plan (ESCP)
Dewatering Management Plan
Biosecurity Controls
Biodiversity Management Plan (Aquatic and Terrestrial Ecology)
Bushfire Emergency Management Plan
Traffic Management Plan
Waste Management Plan
Emergency Services Information Package (ESIP)
Emergency Responders Induction Package
Emergency Plan for BESS
Final Hazard Analysis and Fire Safety Study
Employment and Accommodation Strategy

Further recommended conditions of consent

Whilst I would like to reiterate that I do not believe the Spicers Creek Wind project should be approved the following are conditions required if consent is considered:

- EnergyCo, and DPHI, CWO REZ cumulative impact studies must be completed, and any protections implemented, prior to approval
- five years worth of livestock conception and fertility studies completed prior to consent; consent only to be granted if there are no negative impacts observed
- any landowner within 50km of the project must be indemnified against insurance liability for any damage caused to the Spicers Creek Wind project
- management plans (ie. Emergency Management Plan, Bushfire Emergency Management Plan, Emergency Services Information Package) will be written in consultation with the local employees and/or volunteers of appropriate agencies/departments

- the Applicant must have neighbour agreements signed by 90% of direct project area neighbouring landowners signifying their acceptance of the project prior to consent being granted
- the Applicant must have a voluntary agreements with over 80% of landowners with a non-associated residence within 2km of the project area prior to consent being granted
- proposed visual screening must be completely effective at the end of the construction period and be maintained/replaced by the Applicant for the life of the project
- the Applicant will be liable for any stock losses or infrastructure damage caused by a fire originating at the project site regardless of the affected property insurance coverage status
- all operational staff will be trained Rural Fire Service volunteers and will be available to assist at any fire within the district (20km radius of project site)
- the project site will be protected by two RFS category 1 equivalent fire trucks owned by the Applicant and manned by employees or contractors
- there will be an independently employed officer on site at all times during construction to monitor compliance of conditions of consent (ie. road use). Any breaches will result in the cessation of all construction works until investigated and rectified
- water testing downstream of the project must be carried out monthly by an independent laboratory, both during construction and operation, to ensure no toxic material is being washed into waterways from wind turbines or associated infrastructure
- base line soil testing must be carried out prior to any construction works and then monthly by an independent body, during construction and operation, to ensure there are no adverse impacts to the soil within the project area
- any erosion will be rectified at the expense of the Applicant

Conclusion

“The Department considers the project would not result in any significant impacts on the local community or the environment, is located on a suitable site for a wind farm development, and any residual impacts can be managed through the implementation of the recommended conditions.” **What constitutes significant, and to whom? Is it significant that one landowner stated publicly that she, and her husband, are concerned for the future of their children on their generational farm? Is it significant that several families will leave the district if large scale renewable energy developments are built in the region? Is it significant that a landowner has been forced to sell his generational farm because the impacts of living next door to a wind project are too much to bear?**

Concerned local landowners and community members have been raising many of the issues I have outlined above, and more, since members of the public first learned about the proposed Spicers Creek Wind project. The directly affected and broader community believe a lot of these issues have been glossed over, dismissed or inadequately addressed by the proponent and DPHI. The guidelines allow so many crucial details to be finalised post development consent, without community consideration or input – leaving the proponent with various options that members of the public do not get a chance to comment on and potential major impacts to the community unaddressed.

“On balance, the Department considers that the project is in the public interest and is approvable...” **I wonder if ‘the public’ is considered to be local and directly impacted communities or the public on the eastern side of the Blue Mountains? It seems that rural and regional NSW is bearing the brunt of impacts due to the “rapid transition to renewable energy” and benefitting the least. The impacts are something throwing money at impacted communities cannot rectify.**

I urge the Independent Planning Commissioners tasked with determining the Spicers Creek Wind project to NOT grant consent.

Yours Sincerely,
Emma Bowman

TAX INVOICE

FROM: Emma Bowman

TO: Squadron Energy Onshore Developments Pty Ltd
Department of Planning, Housing and Infrastructure
Independent Planning Commission

Remuneration owed for time spent responding to DPHI Assessment Report and Recommended Conditions of Consent for Spicers Creek Wind

88.25 hours @ \$283.42 per hour

(calculated using EnergyCo's contractor rate & 8 hour days)

(plus time and a half on Saturday and double time on Sunday)

\$25011.82

GST \$ 2501.18

Total owed \$27513.00

NB: Please contact

for bank details for deposit

Log of Hours Spent on Spicers Creek Wind project IPCn submission

31st July – 7.30pm-9.30pm = 2hrs

1st Aug – 6pm-8pm = 2hrs

2nd Aug – 7pm-9pm = 2hrs

3rd Aug – 7pm-8.30pm = 1.5 hrs

4th Aug – 12.30pm-1pm, 2.15pm-3.15pm, 8.30pm-10pm = 3 hrs

5th Aug – 9.30pm-10.30pm = 1hr

7th Aug – 7.30pm-8.30pm = 1hr

8th Aug – 4pm-5pm, 8pm-9.30pm = 2.5hrs

9th Aug – 9pm-10pm = 1hr

10th Aug – 12.30pm-1.30pm, 4.30pm-5.30pm = 2hrs

11th Aug – 6.30pm-10.30pm = 4hrs

12th Aug – 5pm-9pm = 4hrs

13th Aug – 10.30am-1pm, 2pm-4pm = 4.5hrs

15th Aug – 3pm-4pm = 1hr

17th Aug – 8pm-9pm = 1hr

18th Aug – 6.30pm-8pm = 1.5hrs

19th Aug – 8pm-9pm = 1hr

20th Aug – 8.30pm-9.30pm = 1hr

21st Aug – 3pm-4.30pm, 6.30pm-7.30pm, 8.30pm-9.30pm = 3.5 hrs

22nd Aug – 7.30am-8.30am, 3.30pm-4.30pm, 8pm-9pm = 3hrs

25th Aug – 12pm-1pm, 3pm-4.30pm, 6pm-9pm = 5.5hrs

1st Sept – 12pm-1pm, 2pm-4.30pm, 8.30pm-9.30pm = 4.5hrs

2nd Sept – 8.30pm-9.30pm = 1hr

3rd Sept – 7.30pm-9.30pm = 2hrs

4th Sept – 8pm-9.30pm = 1.5hrs

5th Sept – 3.30pm-5pm, 7pm-9.30pm = 4hrs

6th Sept – 9am-10am, 10.30am-1pm, 2pm-5pm = 6.5hrs

Tallawang Solar

Tallawang Solar Farm	SUB-51258214	24/11/2022	No	Object
Attachments				
Comment / Message				
<p>I am a landholder on the Golden Highway east of Dunedoo. I am not totally against renewable energy but I am opposed to it taking over valuable farming land. I believe power should be generated where it is being used; why is the government not subsidising solar panels on industrial and residential rooves in metropolitan areas? Solar farms are not only an eyesore for those left looking at them but they, and the powerlines used to move the power, are going to make fire fighting very difficult. It's not that many years since the Sir Ivan Fire in which there was a lot of aerial assistance. All the projects in the REZ are causing major problems in our small communities; there are divisions forming between friends, neighbours and families which could be avoided!</p>				

Thunderbolt Wind

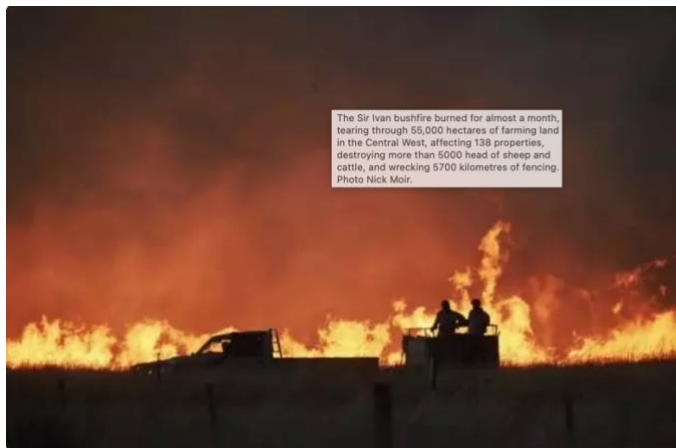
Thunderbolt Wind IPCN Submission

According to the DPHI Assessment Report, the Thunderbolt Wind project EIS received 98 submissions objecting and 14 in support. Tamworth Regional Council made a comment and Uralla Shire Council objected. Surely that sends a strong message to anyone considering how the affected community is feeling? Why is "public interest" a much more heavily weighted argument than the opinions and concerns of the people who will be most affected by a project?

It is suggested that the project will produce 570,000 megawatt hours of energy per year. For each MWh of power produced developers receive one large scale energy generation certificate, a scheme created by the Federal Government as part of the Renewable Energy Target to promote renewable energy generation. On the 19th January 2024 the certificates were worth \$45.75 each meaning the Thunderbolt Wind project will generate over \$26 million per year, and that does not include the sale of power. Why is the income received by affected communities and landowners is such a small percentage of the profit these foreign owned companies/corporations will gain?

Transport and traffic will be a major issue when considering the cumulative impacts of all projects proposed for NSW. A large proportion of construction materials will be transported from the Port of Newcastle to rural and regional NSW requiring the use of the New England Highway and Golden Highway. This route is a major freight route from all of Western NSW to the Port of Newcastle. There will need to be major upgrades to this route prior to the start of any construction of projects. If commodities cannot get from rural NSW to Port that will cost the agricultural industry dearly. There is also the possibility of causing more road accidents due to impatient and frustrated drivers being stuck behind oversize overmass vehicles. How does the proponent, Neoen Australia Pty Ltd, propose to mitigate the enormous impacts the Thunderbolt wind project will have on local roads, and major transport routes to the satisfaction of the local community, and greater rural and regional NSW? The ramifications will be much greater on those who live in the area, or on the transport route, than the experts assessing these impacts suspect. How will those who own a property split by any of these transport routes, or access tracks, safely move livestock across these roads? How will school buses safely traverse these routes twice a day? Will something only be done once an accident occurs or will measures be taken to prevent any accidents?

During the 2017 Sir Ivan Bushfire there was a significant amount of aerial support which saved countless homes, livestock and farm infrastructure. Whilst there is no clear acknowledgment regarding aerial firefighting limitations to date from the RFS bureaucrats, it is obvious to those of us who have been involved in previous firefighting efforts that areas with wind turbines and transmission lines will be avoided by planes and helicopters during a bushfire in difficult terrain that could well be a life and death situation not only for livestock and wildlife but for local residents. What will rural fire fighting look like in the future? Will community members be able to adequately protect themselves? (Please see photos below of the Sir Ivan Bushfire.)



The Sir Ivan bushfire burned for almost a month, tearing through 55,000 hectares of farming land in the Central West, affecting 138 properties, destroying more than 5000 head of sheep and cattle, and wrecking 5700 kilometres of fencing. Photo Nick Moir.

📷 The Sir Ivan bushfire burned for almost a month, tearing through 55,000 hectares of farming land in the Central West, affecting 138 properties, destroying more than 5000 head of sheep and cattle, and wrecking 5700 kilometres of fencing. Photo Nick Moir.



📷 NATURAL DISASTER: Cattle and smoke near the Sir Ivan fire. Photo: DEAN SEWELL



FAIRFAX/ALEX ELLINGHAUSEN Sheep fleeing from a grassfire at Cassilis, NSW, as firefighters continue to fight fires after it was hit by the Sir Ivan fire the day before, on Monday 13 February 2017. Photo: Alex Ellinghausen





FAIRFAX/ALEX ELLINGHAUSEN Property damage at Uarabry, NSW, after it was hit by the Sir Ivan fire the day before, on Monday. fedpol Photo: Alex Ellinghausen

FAIRFAX/ALEX ELLINGHAUSEN A farmer shoots a badly injured sheep at Uarabry. Photo: Alex Ellinghausen



FAIRFAX/ALEX ELLINGHAUSEN A severely burnt sheep is seen in Uarabry on Monday, the day after the town was hit by the Sir Ivan fire. Photo: Alex Ellinghausen

FAIRFAX/ALEX ELLINGHAUSEN Property damage at Uarabry, NSW, after it was hit by the Sir Ivan fire the day before, on Monday 13 February 2017. Photo: Alex Ellinghausen

Renewable energy projects all claim to power a certain number of average Australian homes. Is this whilst the sun is shining and the wind is blowing or 24 hours a day, 7 days a week? Is there an industry standard to calculate these claims?

I note that Neoen suggests using landscape screening as a way to mitigate visual impacts for neighbouring landowners of the Hills of Gold wind project. In the recently IPCn approved Bowman's Creek Wind project one of the conditions of consent is as follows: "implement visual impact mitigation measures (eg landscape screening) on the land of any non-associated residence within 4.4km of any turbine within 5 years from the commencement of constructions of the turbine (should the landowners request it)". Anyone who has ever planted a tree for shade or shelter knows they take years to grow to a substantial size (we have trees planted on my property that were 25 plus years old before we took the fence out around them to let stock use them for shade due to their size). Any landscape screening

should be planted at least 10 years prior to construction so the affected landowner will get some benefit from it. Who is responsible for planting these trees and for their care? Who replaces any trees that die? There are many references to more information being made available during “detailed design” and “further refinement” within the Thunderbolt Wind EIS documents, along with “desktop assessment” or “analysis”. Some of the biggest impacts on the surrounding area are not required to have adequate detail at the EIS exhibition stage therefore not giving the community an opportunity to object or comment on the acceptability or suitability of the proposal – this is not acceptable. All aspects should be ground truthed, and not rely on modelling. All specified Management Plan’s should also be made available to the community to read and respond to prior to consent being granted for any project. Wind projects should not have turbines located where they pose a risk to any neighbouring property ie. blade throw and turbine collapse are serious risks – turbines should not be located within range of a boundary where these risks could impact a neighbouring landholding (if the turbine is 300m to tip no turbine should be within 300m of a project boundary, if it is deemed debris from blade throw or a turbine fire could impact an area of 1km that should form the minimum setback required). The Australasian Fire and Emergency Service Authorities Council’s (AFAC) Guideline Version 3.0 - Wind Farms and Bushfire Operations document published 25th October 2018 states the following in regard to possible firefighting limitations and hazards for emergency responders:

Firefighting limitations in and around the wind farm facilities

Wind farms may result in aerial firefighting limitations due to aerial obstacles created by wind turbines and meteorological monitoring towers. The bushfire at the Waterloo wind farm demonstrated that if conditions are clear and wind turbines are turned off, wind turbines are clearly visible from aircraft and are not likely to constrain aerial firefighting operations (Clean Energy Council 2017). However, during this event transmission infrastructure, meteorological towers and guy-ropes were difficult to see (Clean Energy Council 2017); this infrastructure does have potential to limit the effectiveness of aerial firefighting operations. Access and egress challenges on the ground as well as water supply issues can also create firefighting limitations, if not planned for appropriately. Wind farms can also impact response operations by interfering with local and regional radio transmissions (Australian Wind Energy Association 2004a).

Hazards for emergency responders, including aerial personnel

Turbine towers, meteorological monitoring towers and power transmission infrastructure pose risks for aerial firefighting operations. Meteorological monitoring towers and power transmission infrastructure are generally difficult for aerial personnel to see, if they are not marked appropriately. If wind turbines were not shut down, moving blades and wake turbulence would create significant hazards for low flying aircraft, thus the shutting down of wind turbines, in an emergency situation, is defined in wind farm emergency procedures. A wind farm facility’s power lines may pose electrocution risks, that are exacerbated due to smoke during a bushfire.

The same document also states:

Wind farms can interfere with local and regional radio transmissions by physical obstruction and radio frequency electromagnetic radiation (Australian Wind Energy Association 2004a). The risk of radio communications affecting emergency response operations may be considered in the planning stages for a wind farm development. This issue may be considered in wind farm site selection and equipment selection.

In my opinion, the Thunderbolt Wind project should not be approved due to the large number of concerns from both the local community and greater NSW and Australia. Whilst the project may provide some short term monetary gain for the local area I believe the cost to the environment, agriculture, visual amenity, tourism, roads and transport, and community safety and cohesion is too high to adequately mitigate. Please consider the impacts on those who will be most affected by this project and do not grant approval to the Thunderbolt Wind project.

Thunderbolt Wind IPCn Submission On Additional Information

I offer the following feedback to the Request for Information from the NSW Independent Planning Commission (IPCn) to the Department of Planning, Housing and Infrastructure (DPHI) and the DPHI response.

Firstly, I would like to raise a timing issue with regard to the original Thunderbolt Wind IPCn case submission closing date, 25th March 2024, and the Request for Information letter from IPCn (written by Stephen Barry, Planning Director) to DPHI dated 22nd March 2024. Is it acceptable that the commissioners had formulated ALL possible questions raised from submissions PRIOR TO the official closure at 5pm on 25th March 2024, in fact at least 3 days prior to the official closure? How many submissions were received during the period between when the questions to the DPHI were formulated and the official submission closure and did they receive adequate scrutiny?

Water Resource

The Water Access Licence (WAL) for Pine Creek Dam may well have sufficient suggested capacity to meet demand for the Thunderbolt Wind project construction but what constitutes a “significant” impact? For example, if construction happens to coincide with a dry period would it be a condition of consent that a percentage of water must remain in the dam at all times – restricting the use for the construction of the wind project?

A “verbal agreement” with the landowner who holds the WAL is not acceptable when considering the possible approval of any project. For approval to be granted Neoen MUST have a confirmed, formal agreement in place in regard to any water to be used for construction, and operation, of the Thunderbolt Wind project.

The Biodiversity Management Plan (BMP) should also be publicly available PRIOR TO any possible consent to allow landowners, communities and those with environmental interests adequate time to read, digest and respond to Neoen regarding its content.

The response from DPHI states “the Department, Water Group and the EPA are satisfied that, with the implementation of appropriate mitigation measures, the erosion risks of the project can be adequately managed.” Have any local groups or neighbouring landowners been consulted regarding the proposed mitigation measures? What constitutes “appropriate” to the Department, Water Group and EPA? What is deemed “adequate” when considering the management of erosion – only half of the top soil being washed away, or none?

Firefighting Operations

It is stated that “throughout the assessment process of this project, the Department consulted extensively with various state agencies, including the NSW Rural Fire Service (RFS) during assessment and preparation of the recommended conditions of consent.” Were there any local RFS brigades or

control centres, peak bodies, independent contractors or local landowners and communities consulted in regard to fire fighting operations? I ask this as it is my understanding that no RFS staff are qualified to fly either fixed wing or rotary aerial fire fighting aircraft therefore would it not be prudent to get opinions from those who will putting their lives, or the lives of their staff at risk?

Possible restrictions to aerial fire fighting efforts also poses great risks to farmers, landowners and communities – does that not warrant some input into the decisions that will affect them for the rest of their lives? For example, if it so happened that 25% of current RFS contracted fire fighting businesses refused to fly within the boundary of any wind, solar or transmission project that would severely limit the aerial assistance received, especially within areas with multiple projects (ie. mean instead of 4 aerial crews assisting in a major fire it would mean there would be only 3), putting more pressure on ground crews, and endangering more livestock, wildlife, habitat, infrastructure and most probably human lives especially in cases where a fire is in difficult terrain to access from the ground.

The Emergency Management Plan should also be publicly available PRIOR TO any possible consent to allow landowners, communities and those with fire fighting interests adequate time to read, digest and respond to Neoen regarding its content.

I find it interesting that “RFS did not raise any concerns about the project or recommended conditions” after consultation with the Department regarding the Thunderbolt Wind project. Is this due to RFS being a statutory body of the Government of NSW, and therefore not willing, or able to go against current government policy?

With regard to the recommended capacity of a water tank on site - a 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for the obvious reasons of there being less damage done. A average call out for RFS members would see half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 20,000L is not enough water to adequately fight even the smallest of fires in rural NSW.

An Asset Protection Zone (APZ) around wind farm infrastructure may well assist in protecting those structures from fire, but what/who will protect the surrounding habitat, farming land and communities? It is stated that “the Department is satisfied that aerial firefighting and the bushfire risks can be suitably controlled through the implementation of appropriate fire management measures and procedures.” I’m pleased that the Department is satisfied but I can categorically say that many landowners, who are the ones at risk when considering bushfires or grass fires, are not! What constitutes “suitably controlled” to the Department and IPCn when considering bushfire risks, and what fire management measures and procedures are considered “appropriate”?

I received the following email and attachment from David Braid, Managing Director & Chief Pilot of Eagle Helicopters stating the company intention regarding aerial fire fighting operations within a wind project area.



windfarm fire fighting operations
To: Emma Bowman



Gday Emma hope this helps

Regards,
David Braid
Managing Director

EAGLE HELICOPTERS PTY LTD

Email:
Website: www.eaglehelicopters.com.au



EAGLE HELICOPTERS PTY LTD

"Maroombah North"
2860 Eucharanea Rd
Eucharanea NSW 2866

Ph: 02 63641144
Fax: 02 63641155
Mobile: 0427 427 207

Email: eaglehel@bigpond.com
web: www.eaglehelicopters.com.au
ABN: 78 069 785 315

11th April 2024

To whom it may concern,

I David Braid acting as Managing Director and Chief Pilot of Eagle Helicopters.

Issue this statement as a directive to all staff Aircrew that whilst participating in aerial firefighting activities do not at any time enter any wind farm whether turbines are static or rotating do not at any time enter the windfarm to conduct aerial fire fighting duties.

This directive is active forthwith of the publication of this Letter.

Justification of this Company directive

That in the event of a fire in the windfarm it is and would be deemed that at no time can or could we 100% guarantee the safe conduct of operations, that would allow operations to be conducted in a safe manner in regard to any incursion with blades towers whilst the effect of bush fire smoke creates a limited view of the working area.

David A. Braid
Managing Director

I also reiterate the following from my original submission:-

The Australasian Fire and Emergency Service Authorities Council's (AFAC) Guideline Version 3.0 - Wind Farms and Bushfire Operations document published 25th October 2018 states the following in regard to possible firefighting limitations and hazards for emergency responders:

Firefighting limitations in and around the wind farm facilities

Wind farms may result in aerial firefighting limitations due to aerial obstacles created by wind turbines and meteorological monitoring towers. The bushfire at the Waterloo wind farm demonstrated that if conditions are clear and wind turbines are turned off, wind turbines are clearly visible from aircraft and are not likely to constrain aerial firefighting operations (Clean Energy Council 2017). However, during this event transmission infrastructure, meteorological towers and guy-ropes were difficult to see (Clean Energy Council 2017); this infrastructure does have potential to limit the effectiveness of aerial firefighting operations. Access and egress challenges on the ground as well as water supply issues can also create firefighting limitations, if not planned for appropriately. Wind farms can also impact response operations by interfering with local and regional radio transmissions (Australian Wind Energy Association 2004a).

Hazards for emergency responders, including aerial personnel

Turbine towers, meteorological monitoring towers and power transmission infrastructure pose risks for aerial firefighting operations. Meteorological monitoring towers and power transmission infrastructure are generally difficult for aerial personnel to see, if they are not marked appropriately. If wind turbines were not shut down, moving blades and wake turbulence would create significant hazards for low flying aircraft, thus the shutting down of wind turbines, in an emergency situation, is defined in wind farm emergency procedures. A wind farm facility's power lines may pose electrocution risks, that are exacerbated due to smoke during a bushfire.

The same document also states:

Wind farms can interfere with local and regional radio transmissions by physical obstruction and radio frequency electromagnetic radiation (Australian Wind Energy Association 2004a). The risk of radio communications affecting emergency response operations may be considered in the planning stages for a wind farm development. This issue may be considered in wind farm site selection and equipment selection.

The Aerial Application Association of Australia (AAAA) also has a wind farm policy available here (<https://aaaa.org.au/policies/>).

Accommodation

“The Department acknowledges cumulative impacts are a key concern of many of our stakeholders in renewable energy zones (REZs)”. “The Department is continuing to work closely with the Energy Corporation of NSW to jointly conduct cumulative impact studies for the New South Wales REZs”. Is it acceptable that projects are continuing to be assessed and approved PRIOR TO the completion of these studies? Or that “while the additional work would assist future projects, this work cannot be applied to the Thunderbolt Wind Farm”.

How is it permissible for an Accommodation and Employment Strategy to be included in the conditions of consent, not PRIOR TO consent? Again, the cart is going before the horse.

Voluntary Planning Agreement

Is it acceptable that an applicant can bypass the support or acceptance of affected councils by making a Section 7.12 of the EP&A Act contribution? Surely LGA’s, who are representing the communities within their boundaries should be permitted to object to, and ultimately reject projects when it is believed it is not in the best interests of their ratepayers.

I note numerous references to 33% of the contribution being “spent in and to the benefit of the immediate community”. Who agreed to this percentage? Was it council and the affected communities, or Neoen, or the Department? Will that adequately compensate the local communities for the upset, devastation and the permanent change in their district?

The term “local community” being defined as “the communities within the Tamworth Regional Council LGA and up to Bendemeer, ie. the area around the Thunderbolt Wind Farm project within a 20 minute drive” is very ambiguous. Is it 20 minutes at 100km/hr or 50km/hr?

Again, I urge the Independent Planning Commission to deny approval to the Thunderbolt Wind project proposal.

Emma Bowman

Valley of the Winds Wind

Valley of the Winds Wind Farm	SUB-44449425	08/06/2022	No	Object
Attachments				
Comment / Message				
As a landholder that would see most of the towers in the Valley of the Winds Wind Farm I think these massive eyesores will ruin the scenery in our area. Electricity should be generated where it is needed rather than causing a huge impact on some excellent farming and grazing land (not only with the towers but the power lines used to get the power where it needs to go). The upheaval caused to get the towers where they need to go is massive and unwarranted!				

Wallaroo Solar

WALLAROO SOLAR IPCn SUBMISSION

Introduction

The Wallaroo Solar project has the potential to have enormous impacts on the local community and region due to a plethora of possible unintended consequences of turning rural agricultural land into an industrial area.

<u>Excerpt from DPHI Assessment Report</u>	<u>Response/Issue/Question</u>
“The Department considers that the project represents an effective and compatible use of the land and that the site is suitable to accommodate the development.”	An effective use of rural agricultural land is providing food and fibre. “From a global perspective, it is estimated that farmers will have to produce 70% more food by 2050 to meet the world’s expected nine billion population” (Office of the Director, Agricultural Development Economic Division, Economic and Social Development 2009). How will farmers produce more food with less land? How is industrial, large scale energy generation infrastructure responsible for a loss of agricultural land and/or production, compatible with rural areas?
“The Department notes that WSF has committed to continue grazing concurrently with the operation of the solar farm where appropriate.”	A commitment that ends in “where appropriate” should not be acceptable to the Department. The loss of agricultural land is being mitigated by sheep grazing under the panels yet it is not a required measure. How will WSF mitigate the loss of land to agricultural production without grazing sheep under the solar panels? And how will the Department enforce this condition? Has WSF conducted adequate research into construction of solar infrastructure to guarantee the wellbeing and safety of the sheep supposedly grazing under the panels so there are no animal welfare issues?
“Despite the large number of residences located in proximity to the site, the Department considers that impacts on visual amenity and landscape character would be low.” “... the Department does not consider the broader landscape character of the area would be significantly affected.”	There are numerous regional cities protected from large scale infrastructure projects being built within a certain radius. <i>State Environmental Planning Policy (Transport and Infrastructure) 2021, Part 2.3, Division 4, 2.42 “(2) Development consent must not be granted unless the consent authority is satisfied that the development (a) is located to avoid significant conflict with existing or approved residential or commercial uses of land surrounding the development, and (b) is unlikely to have a significant adverse impact on the regional city’s (i) capacity for growth, or (ii) scenic quality and landscape character.”</i> Why is Canberra not subject to the same protection? Those who spoke at the IPCn meeting, who live in the immediate vicinity of the proposed project, were understandably concerned about the negative impacts to visual amenity and changes to the landscape character. When will DPHI and IPCn place appropriate importance on the concerns and opinions of those who are directly impacted by proposed renewable energy developments?
“The Department considers the project would not result in unacceptable impacts on the	What impacts are considered “unacceptable”? Will WSF, and the Department, guarantee there will be no local road user injured or killed as a result of a road accident with, or caused by, an

capacity, efficiency or safety of the road network.”	<p>employee of the solar factory during construction, operation or decommissioning?</p> <p>Will all vehicles associated with the Wallaroo Solar project be fitted with GPS tracking devices, and monitored, to ensure there is no misuse of traffic and transport routes, nor use of roads outside of prescribed hours?</p> <p>Will all drivers be educated, and have experience, driving on rural roads prior to being employed to work at Wallaroo Solar?</p>
“The Department considers that the project would result in benefits to the State of NSW and the local community and is therefore in the public interest and approvable.”	<p>How many Department staff live and/or own and run a business within the Wallaroo district? How many will be directly affected by the potential negative impacts of the Wallaroo Solar project?</p> <p>Will the Department staff, and IPCn commissioners and staff, responsible for approval of this project be personally liable for any issues that negatively impact local landowners, residents and business owners as a result of the Wallaroo Solar project?</p> <p>What does the term “in the public interest” really mean? Are the 88 members of the public who have objected to the Wallaroo Solar project considered adequately under the term “public interest”? Are the landowners and farmers who have already had and will have their lives, families, homes, businesses and environment adversely impacted by the project considered adequately under the term “public interest”? Is it really acceptable to place the entire burden of energy generation on rural and regional areas, and have the people who provide the country with food and fibre make all of the sacrifices, to service metropolitan areas and deem it for the “greater good”?</p>
<p>“During the exhibition period of the EIS, the Department received 97 unique submissions from the community, including six special interest groups (88 objections, five support and four comment).”</p> <p>“Around 67% of submissions were received from residents located within 20km of the site, primarily from the suburbs of Wallaroo, Dunlop and MacGregor.”</p>	<p>It is very important to note the number of objections compared to supporting submissions received from the public during the EIS exhibition. Also, I do not believe there were any community members willing to speak in favour of the project at the IPC meeting held in Murrumbateman. Does Wallaroo Solar project have social license?</p> <p>The Australian Energy Infrastructure Commissioner, throughout the Community Engagement Review consultation, held over 75 meetings with representative stakeholders, landowners and community groups and received 250 online survey responses and over 500 written submissions. It found that 92% of respondents were dissatisfied with the extent to which project developers engaged the local community and 89% of respondents stated that the information they received from project developers was not relevant to the concerns that they raised.</p> <p>The Community Impact Survey, conducted by Property Rights Australia and NREN, collecting 775 responses between Saturday 12th April and Friday 10th May 2024. An overwhelming 93% of respondents believe that the government has not acted in good faith rolling out renewable energy projects – nearly all feel that government departments have failed to conduct open and transparent consultations, and an even larger portion say their concerns have been completely ignored. 76% of respondents reported feeling pressured by energy companies to allow access to their private properties and a tiny 3% believe that the developers have acted with integrity.</p>

	The results from these two consultations highlight the major issues within the renewable energy sector regarding community engagement!
“With a generating capacity of 100MW, the solar farm would generate enough electricity to power about 40,000 homes.”	<p>Will Wallaroo Solar provide power to the advertised 40,000 homes, or equivalent, 24 hours a day, 7 days a week, or only when the sun is shining?</p> <p>New South Wales experiences 4-5 hours peak sun hours per day in summer and 3-4 in winter. According to the Australian Energy Regulator in 2023, the average energy used per day by a household with four people is about 21.355 kWh which is equal to 0.89kW. Peak hours of use are 6-8.30am and 5-9pm; all hours outside the peak sun hours. Is renewable energy going to provide reliable and cost effective power to Australian residents?</p>
“The Department notes that Council has objected to the project on the basis of consistency with the <i>Yass Settlement Strategy 2036</i> . The strategy recommends that land within 5km of the Western Yass Valley – ACT Border, which includes the project site, should be maintained as productive rural land by restricting conflicting land uses and preventing encroachment of intensive rural development. The project would maintain agricultural use of the land through ongoing grazing of the site, while limiting the potential for residential development or other conflicting land uses to occur, in keeping with the Settlement Strategy.”	<p>The ongoing agricultural use of the land hinges on WSF using sheep to graze whilst the solar project is operating, “WHERE APPROPRIATE”. What if there is no part of the project that is deemed appropriate? No condition of consent requiring WSF to use sheep to graze under the solar panels completely negates the need for agricultural use to be ongoing rendering the project inconsistent with the Yass Settlement Strategy 2036.</p> <p>The Settlement Strategy seeks to prevent the encroachment of intensive rural development. How is taking the project site out of agricultural production and installing a large scale solar project any different from building hundreds of homes on the site?</p> <p>Local government areas are in place to protect and represent local communities, like Wallaroo. Yass Valley Council objected to the project to safeguard the local area and the things most important to the shire residents.</p>
“The assessment found that the soils within the site were of generally low fertility and structural integrity.”	<p>Should soils with low “structural integrity” be subject to the disturbance that will be undertaken during construction of a large scale industrial project? Will WSF guarantee there will be no adverse impacts to the site, or any other land within the area due to construction, operation and decommissioning?</p> <p>If there are adverse impacts what measures will the Department take to rectify any damage, and what penalties will apply to the proponent?</p>
“WSF has committed to, and to restoring the Land and Soil Capability of lands disturbed through decommissioning to existing land and soil capability.” “Accordingly, the Department has included requirements to maintain the site’s current land capability, where practicable, during the construction and	<p>How long after decommissioning will WSF have to “reinstate the agricultural capability of the land”? Who is responsible for measuring the enforcing such conditions of consent? Will there be baseline testing done prior to the commencement of construction?</p> <p>Is a requirement to maintain the sites current land capability, “WHERE PRACTICABLE” stringent enough to require such maintenance? Who decides what is practicable?</p>

operation of the project. WSF would also be required to fully reinstate the agricultural capability of the land following decommissioning of the project, including the requirement to return the development footprint to pre-existing productive capacity.”	How does WSF plan to return the development to pre-existing productive capacity? What measures are in place to ensure that it is done to an appropriate standard? Who decides if the land is restored correctly and adequately?
“Several creeks and alluvial plains containing riparian corridors surround and intersect the site, as well as limited areas of remnant patchy woodlands on undulating hillsides.”	How will WSF guarantee no pollution of water sources or alluvial plains as a result of the Wallaroo Solar project? Will WSF be liable for any impacts caused to downstream properties or livestock and environment in the event of pollution attributed to the solar project? Has the Department conducted base line water and soil testing prior to construction of the solar project?
“Landscape planting would be provided at locations around the perimeter of the solar array to soften and fragment views of the project.”	When will landscape planting take place? When will landscape planting be considered effective screening? Will WSF be planting mature trees and shrubs or tubestock?
“The Department recognises that the introduction of the proposed solar farm to a rural area would result in a change to the local landscape, but considers the development would have a limited impact beyond the project’s immediate vicinity. Accordingly, the Department considers the project would have a limited impact on the broader landscape character of the region as a whole.”	How many metres or kilometres is classed as the “immediate vicinity”? The Wallaroo Solar EIS states on page 108 that “there are 336 identified dwellings within 1km of the Development Site and over 4000 non-associated dwellings within 2km.” Does this suggest those within the “immediate vicinity” would have less than a limited impact? The IPCn meeting heard multiple speakers who aspired to live in the Wallaroo area, due to its landscape character, and worked hard to make that a reality. I do not believe any of them would have had the same aspirations had there been an industrial sized solar factory built where it is now proposed. Has the Department taken the local communities views into account adequately when making this statement?
“The project would not be visible from any major transport routes.”	Does this suggest that as long as the project is not visible to the general public it is permissible? What about the population that will see it from their kitchen or bedroom windows, or from their front or back verandah; why does that not carry as much weight as being visible to the general public passing through?
“The Department has recommended conditions of consent requiring the development ensure the solar panels and ancillary infrastructure do not cause any increased water being diverted off the site or alter hydrology off site.”	As a general rule, one millimetre of rain over one square metre is equal to one litre of water. Wallaroo Solar is proposing to use 165.45ha for solar panels. If you consider that 55ha might actually be solar panels, a non-porous surface, 20mm of rain would mean 11 megalitres of water not able to disperse evenly into the soil ($550,000\text{m}^2 \times 20 = 11,000,000$ litres). Granted, even without solar panels 20mm of rain in a short amount of time would create surface runoff but water sheets off non-porous surfaces with much more velocity creating potential erosion and sediment issues.

	How will WSF guarantee that there is no increase in water diverted or alteration in hydrology off site?
<p>“The site is mapped as bushfire prone land.”</p> <p>“Subject to recommended conditions, the Department, FRNSW and RFS are satisfied that risks associated with the project would be minimal.”</p>	<p>The EIS states that “water storage tanks would be installed within the Development footprint for fire-fighting and other non-potable water uses, with a 65mm Storz outlet, a metal valve and a minimum of 20,000 litres reserved for fire-fighting purposes.” NSW regulations state a home built on bushfire prone land must have water storage of 10,000 litres (for a landholding of 1 hectare) or 20,000 litres (for a landholding of more than 1 hectare). Is 20,000 litres an adequate water supply to protect an industrial sized energy generation development from fire?</p> <p>A 38mm fire fighting nozzle is capable of pumping 280L/minute meaning 20,000L of water would be used in 71 minutes. During most grass or bushfires there are numerous fire fighting trucks and trailers used in an attempt to put the fire out in a timely manner for the obvious reasons of there being less damage done. An average call out for RFS members would see half a dozen vehicles/trucks attend – six 38mm nozzles would use 20,000L in just over 10 minutes. It would be nice to think you could have a fire blacked out in that time but it is simply not reality. 20,000L is not enough water to adequately fight even the smallest of fires in rural NSW.</p> <p>What strategy will Wallaroo Solar Farm (WSF) Pty Ltd implement to assist the local community and RFS in future fire fighting efforts in the region? Will RFS and FRNSW be granted access to the project site at all times? Will WSF pay for the training and time needed for RFS volunteers to be educated in fighting fires within and surrounding a solar project? Where would construction workers be evacuated to in the event of a fire during the construction period? Can WSF guarantee that the evacuation of construction workers will not impede, and therefore risk the safety of, local community members and their livestock?</p>
<p>“The Department considers that the project would not result in any significant or widespread reduction in land values in areas surrounding the project.”</p>	<p>Has the Department conducted a thorough investigation into land values throughout NSW with a focus on areas with proposed, under construction and operating solar factories to come to this conclusion? How was this investigation carried out?</p> <p>I note that two experienced real estate agents have both given the opinion that land values will decrease significantly in an area well regarded for its scenic landscapes.</p> <p>Will WSF, the Department and IPCn guarantee there will be no adverse impacts to land values in the Wallaroo district, and reimburse any landowner for the loss of income from the sale of their property?</p>
<p>“The Department notes that the Insurance Council of Australia is not aware of any instances where Insurance Council members have been unable to provide insurance or have increased premiums as a result of a farm (or a neighbouring property) hosting energy infrastructure.”</p>	<p>I do not imagine the Insurance Council of Australia has had any members unable to provide insurance or has offered increased premiums as a result of a renewable energy infrastructure project. The issue is in fact around public liability insurance, not general insurance. The majority of farm businesses would have a \$20 million public liability insurance policy to cover accidental incidents due to the risks involved with farm machinery, infrastructure and livestock. Landowners being forced to neighbour large scale renewable energy infrastructure projects find themselves adjacent to projects worth hundreds of millions, if not billions of dollars. What if there is a fire, where a landowner is found negligent (a burn off not adequately blacked out, a pile burn that sneaks away, or a fire ignited by machinery – we have all seen them!) and there</p>

	<p>is \$100 million of damage done to the neighbouring project infrastructure? Will landowners lose their business, family home and heritage all because their neighbour, or someone in the district, made the decision to host renewable energy infrastructure?</p> <p>Will WSF indemnify all landowners in the district against damage to solar project infrastructure, or reimburse landowners for the cost of adequate public liability insurance to protect their businesses and homes?</p>
<p>“The <i>Large-Scale Solar Energy Guideline</i> identifies four key decommissioning and rehabilitation principles for circumstances where an applicant ceases operating a project, which are the removal of project infrastructure, returning the land to its pre-existing use, including rehabilitating and restoring the pre-existing LSC Class where previously used for agricultural purposes, and the owner/operator of the project should be responsible for the decommissioning and rehabilitation and this should be reflected in an agreement with the host landowner(s).”</p>	<p>What protection will WSF offer the host landowner in the case that the owner/operator defaults at the time of decommissioning?</p> <p>How can the local community be assured decommissioning will be undertaken in a timely manner (especially if the owner defaults and the landowner does not have the required funding)?</p>
<p>“The Department considers that the project achieves an appropriate balance between maximising the efficiency of the solar resource development and minimising the potential impacts on surrounding land users and the environment.”</p>	<p>What is an “appropriate balance”?</p> <p>A relatively small number of landowners having to endure the negative impacts of the project to appease those who believe renewable energy is the most reliable and efficient way to power the nation? Would this situation look different if solar factories were being proposed on every football field and park in metropolitan areas?</p>

Conclusion

“The Department considers the project would not result in any significant impacts on the local community or the environment, and any residual impacts can be managed through the implementation of recommended conditions.” What constitutes significant, and to whom? Is it significant that one landowner is worried for the safety of paying clients and the welfare of valuable animals located on their property? Is it significant that there are 336 dwellings within 1km and more than 4,000 located within 2km from the proposed installation without their consent? Is it significant that a quiet, rural locality will become a bustling construction zone for 12-18 months, and then turn into an industrial wasteland?

Concerned local landowners and community members have been raising many of the issues I have outlined above, and more, since members of the public first learned about the proposed Wallaroo Solar project. The directly affected and broader community believe a lot of these issues have been glossed over, dismissed or inadequately addressed by the proponent and DPHI. The guidelines allow so many crucial details to be finalised post development consent, without community consideration or input –

leaving the proponent with various options that members of the public do not get a chance to comment on and potential major impacts to the community unaddressed.

“The Department considers that the project ... is therefore in the public interest..” I wonder if ‘the public’ is considered to be local and directly impacted communities or the public on the eastern side of the Blue Mountains? It seems that rural and regional NSW is bearing the brunt of impacts due to the “rapid transition to renewable energy” and benefitting the least.

I urge the Independent Planning Commissioners tasked with determining the Wallaroo Solar project to NOT grant consent.

Yours Sincerely,
Emma Bowman

The Broad Issues

- Rooftop solar is already exceeding capacity required during fine, sunny periods and causing grid issues as it cannot be adequately controlled – why build large scale solar infrastructure that has many negative impacts on agriculture and the environment? Why not find a way to capture and store the power that is being generated but wasted already? Why not provide subsidies, or grants, for individuals and businesses to install solar panels on their rooves, and for batteries to assist during periods of cloud cover and at night? Why have all Government owned buildings got solar panels, and why not cover carparks with solar panels so assist with shading and power generation?
- The “rapid transition to renewable energy” has been advertised as being implemented to cut Australia’s emissions and provide more clean, green energy generation – does that mean all mining for export in Australia will cease? I do not believe that will be the case as it is too lucrative for the Australian economy. Given we have the cleanest coal in the world, and mining will not halt all together, why would Australia not consider building new, more efficient, cleaner coal fired power stations?
- Population growth is a major issue with regard to power needs. We are taking agricultural land for energy generation projects, because we need more power, but how does one expect to feed the growing population in the years to come with less agricultural land?
- Where is the education for the way power is consumed in Australia? We are being urged to turn air conditioners off during “periods of extreme heat” due to a potential power shortage, yet are we being educated about conserving power at all times? It would be interesting to look at the area’s in Australia where the most power is used per capita – I would almost bet it would be metropolitan areas.

Time Wasted & The Ultimate Cost

The “consultation and engagement” period of all large scale renewable energy infrastructure projects, the exhibition of Environmental Impact Statements (EIS), subsequent research and submission writing, general research into legislation, legal precedents, rules and regulations, scrutinising contracts, lobbying Government authorities and members of parliament for support and communicating with other affected landowners and community members, neighbours, friends and family is a time consuming business. Those community members and/or landowners who are interested in learning about a specific project, or having their say during an EIS exhibition period or on Government policies, are forced to do so “on their own dime” while Government and renewable energy developer employees, contractors and consultants are fully remunerated, often handsomely. As evidenced previously in this submission I, personally, spent 88.25 hours on an Independent Planning Commission submission regarding the Spicers Creek Wind project, and I have spent 110 hours on this submission alone. EnergyCo contractors, as mentioned above, were paid an average of over \$2,200 per day – if I had some fancy letters behind my name and was engaged rather than volunteering, I would be due over \$385,000 for the more than 1,400 hours of work I put into the CWO REZ over the past two and a half years. While the money would not make this all better, maybe I would feel like my contributions were valued by the NSW Government and people that are being paid by my taxes would answer my phone calls and emails, instead I have become a complete pain in the ar*se!

I would be interested to do a study to make public the number of livestock lost, opportunities missed, costly mistakes made (due to a lack of time and capacity to think things through adequately), production forfeited, infrastructure in a state of disrepair and family and neighbour relationships decimated as a result of the “rapid transition to renewable energy”. There are numerous examples of all of these things all over the country, and if the rollout continues it will only get worse.

Personally, I have spent so much time in the office over the last 16 months and have had my head filled with CWO REZ issues that things on my property have not been progressing. While the day to day jobs get done, out of simple necessity, there are fences that have not been replaced, limbs and branches that have not been piled up ready to be burned and piles not burned over the last winter, weeds that have not been sprayed, horses that have not been broken in to be sold and a life that has been all work and no play.

Will the ultimate cost of the CWO REZ, and the other REZ’s around the country, be a loss of agricultural production, a rise in food and clothing costs, and a complete decimation of the way of life of thousands of Australians? Maybe it will be a country where the lights are on but there is nothing to eat, or alternatively, a place where you don’t choose when you have power? Or will it be a life, or lives lost that could have been prevented?

Conclusion

The false starts, iterations and deficiencies of the Central West Orana Renewable Energy Zone, both as a whole and more specifically individual projects, evidenced by the extremely poorly selected initial transmission route (Merriwa-Cassilis Plateau), the inept handling of the study corridor to final route selection process, the realisation of a lack of generation capacity and consequential declaration amendment doubling the output, the headroom assessment ultimately increasing the aggregate maximum capacity cap, the abhorrent treatment of affected landowners, the abysmal community consultation and engagement brought about by incompetent, ignorant and insensitive staff and the obvious lack of planning and local knowledge leading to cost and time blowouts indicate that the Renewable Energy Zone model has so far been an exceptional failure.

The CWO REZ being touted as the “pilot REZ” should not instil any confidence in the Government, or the Australian taxpayers that the “rapid transition to renewable energy” is on schedule, functional or achievable and will deliver the “affordable, reliable and clean energy to homes, businesses and industries in NSW” as promised. The fact that lessons have not been learnt from the mistakes made during the rollout of the “guinea pig REZ”, and are being constantly repeated in subsequent Government owned and managed developments should be ringing alarm bells. When will there be a pause to adequately and diligently assess if all the devastation and destruction will be worth it, and if the ultimate plan is even going to keep the lights on for our great nation?

It has been quite the undertaking to compile this submission, concerning both time spent (which I ultimately ran short of!) at great personal cost and a toll on my farm business, and the mental, physical and emotional toll of opening old wounds inflicted by EnergyCo and renewable energy developers, all the while still dealing with the planning and rollout of projects – especially CWO REZ transmission. I have so much more to say, but I’ve run out of time.

The process has been enlightening and distressing for two main reasons:-

1. Reading notes, documents, emails, advertisements and project updates, reliving meetings and phone calls has served to remind me just how much I’ve learnt and what I am willing to sacrifice to protect my industry, community, environment, home, business and family.
2. The realisation that the majority of the concerns and issues community members and landowners have been raising about the entire “rapid transition to renewable energy”, the REZ model at the forefront, remain unanswered, unmitigated and ultimately ignored as we march on with the planned program despite the potential disastrous impacts.

Although it is impossible to fully comprehend the catastrophic impacts of having a Renewable Energy Zone thrust upon your community, home, livelihood and family, without your knowledge or consent, until you have experienced the devastation first hand, I hope my submission, and those from other farmers, landowners and community members will assist you in understanding the current and potential future impacts to some degree. There is an open invitation for any Member of Parliament to visit, and be guided through the Central West Orana Renewable Energy Zone.

While I have no doubt the Inquiry process will serve to highlight a lot of wrongdoing by NSW Government authorities and renewable energy developers, I would like the committee to seriously consider what recommendations could be made and what actions can be taken to remedy what has already transpired, and is continuing to impact residents who are living, on a daily basis, with the impacts of the “rapid transition to renewable energy” and the Renewable Energy Zone model rollout, while the Inquiry is ongoing. The transition has highlighted the power imbalance that exists between Government, the legislation that is agreed upon in Parliament House, and Australian citizens, particularly those who reside in rural and regional areas. Is it even possible to have equilibrium restored so as not to steamroll a portion of the population when infrastructure projects are rolled out?

I sincerely hope there are lessons learnt, and major changes implemented to the way 'nation building projects' are designed, consulted and executed hereafter so as not to unnecessarily desecrate communities, businesses, families, and the environment as the Central West Orana Renewable Energy Zone has.

Yours sincerely,

Emma Bowman