

Submission
No 141

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

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Central West Orana – Renewable Energy Zone – Enquiry

As a member of the STOP Boree Solar Farm Geurie, a farmer for 15 years and having grown up on the land in Central NSW, I would like to make this submission:

The Chair,

Abbreviations are listed at end of document.

Strategic Issues

- Regulatory framework for CWO REZ biased pro development, lacks transparency and missing key protections and controls in Initial Proponent/Site Selection Phase that is not controlled within the EIS approvals process.
- Communities impacted have very low awareness of what CWO REZ and NSW Planning targets for wind/solar projects and impacts. Locals think REZ is another planning scheme term and have no idea what CWO is or what the future will hold when of solar farms are implemented as per regional plan.
- Monopoly “transmission operator licence” and associated regulatory framework locks out ongoing consideration of alternatives and new technologies.
- The NSW Government, DPHI and EnergyCo have diminished their responsibilities for ongoing transparent demand side and supply side electricity supply planning with alternative developments, a seriatum of opportunities and adoption of advancing technologies seemingly abandoned in favour of REZ policy.. Delays and years of failure to implement major supply side initiatives has now resulted in the great rush to implement deployment of 4.5 GW of grid capacity, which will grow to 6GW by 2038, being concentrated solar and wind “farms” in 5 zones in rural NSW for the rapidly growing load demands of Sydney, Newcastle and Wollongong. The regulatory framework has indicators that it has been hastily developed 2022-2024 and checks and balances in the design of the framework, particularly the power imbalance for local communities, particularly farmers/landowners is appalling.
- It appears the Infrastructure Planner is focused on transmission projects and coordination arrangements for an orderly and timely development of solar farm projects has been left as a cash grab/quick sell off/free for all space. The Regional Reference Group stopped in 2022, and something akin to regional coordinated input to inform the Infrastructure Planner seems to be missing.
- The NSW Government Regional Plan 2041 says “Land use planning can help to guide an orderly transition and maximise these benefits for the region”. There has been no land use planning undertaken, it’s a free for all. LGA has not had any time to review and amend Planning Schemes as originally envisaged.

- Confusion. Local government, ACERREZ, EnergyCo and DPHI all have documentation that points to the other as the responsible regulator for solar farm project development:
 - DPHI Regional Plan 2041 for CWO REZ says EnergyCo will manage generation development process
 - DRC at community meetings says its all in the hands of NSW government to run the EIS and are not transparent with local community about their role.
 - EnergyCo is focussing on transmission projects and the regulatory framework for CWO REZ projects has been a cut & paste of existing transmission frameworks. The design of guidelines has been extended from transmission projects to solar farms without proper understanding of the complexity of generation projects. Tweaks have been made for solar farm projects and the guidelines have a level of bias in favour of the developer.
- Political – “Solar power is the cheapest form of electricity generation”, (Ref CSIRO/Min Chris Bowen) has driven a renewables focused energy policy and closed minds to emerging technologies and rapidly changing global situation. This slogan has also been repeated by AI and BOTS. It is a significant miscalculation of the true cost of wind/solar total cost delivered to consumer and needs to be redressed at a political level. If not, electricity price shocks will continue.
- Principles based – Secrecy, divide and conquer needs to be replaced with transparency and engagement.
- The Community Benefits Program needs to directly focus on landowners impacted, not consider as an afterthought.

ACTIONS:

- DPHI/EnergyCo review & revise regulations to ensure alternative options outside REZ are appropriately fostered and not locked out. For example DC line/larger scale solar projects further west in the state, large scale base/intermediate load storage via battery projects.
- EnergyCo ensure through ACERREZ and other appropriate mechanisms that transmission and distribution systems allow for the growth in roof top solar generating capacity is reserved over the next 35 years.
- Reinstate CWO REZ Regional Reference Group with revised Terms of Reference to:
 - Ensure Landowner representation from each LGA is fostered and facilitated.

- focus on local awareness and shared issues management across LGA in CWO/REZ.
- Ensure regulatory framework and improvements across each LGA in CWO REZ remains consistent. e.g .Have all LGA's adopted the Voluntary Planning Agreement Policy for Renewable Energy Projects 2023 and associated enhancements?
- DPHI allocate funding for locally driven awareness programs, designed, implemented and rolled out by local community based organisations in each LGA.
- Provide clear statements of roles and responsibilities of DPHI/EnergyCo/ACERREZ and Local government in rollout of CWO REZ.
- Redress the power imbalance between landholders and proponents by:
 - Increasing transparency of development proposals
 - Requiring all access agreements and lease option agreements be made publicly available
 - DPHI engage independent consultants to run information forums in each LGA
 - Local governments write a letter of explanation of the CWO REZ to each landholder and set out how the REZ affects their land and what support is available.
- Extend the EnergyCo Strategic Benefit Payment Scheme from transmission projects to solar projects to compensate adjoining neighbours of solar farm projects.

Process Failures

- Proponent fit-for-purpose threshold missing in regulatory framework.
- Site selection phase guidelines missing.
- Community Benefits Program – Community Reference Group is a failure. CRG members are biased and actively work against the interests of the local community affected by proposals.

ACTIONS:

- DPHI/Energyco develop a Proponent Fit-For-Purpose guideline requiring proponents meet threshold requirements and publish on CWO REZ website including:
 - Statement that no fines or breaches in other projects
 - Statement that all personnel complete annual Code of Conduct and ethics training
 - Statement that Stakeholder Engagement and Community Consultation Management systems meet ISO 1900 Standards

- Implement pro-forma of EIS statement of conditions associated with local impacts be included in project EIS approvals including:
 - Transparent disclosure of annual auditing and compliance
- DPHI/Energy Co implement site selection guidelines that are included in the EIS process:
 - Gross visual impact for any neighbouring landholder must be less than 50% of their boundary, unless landowner impacted negotiated setbacks have been delineated within the project boundary.
 - Minimum SEED threshold – prime farm land is prohibited
 - Waste sites, remediated sites, post industrial sites, reclaimed mining sites should be encouraged.
 - Formal site selection proposal to include assessment of 2 alternative sites and why rejected
 - Transmission capacity displacement/new transmission cost should be included in site selection evaluations.
 - Site selection evaluation addressing above included as a requirement in the SEARS process.
- DPHI/Energy Co implement stakeholder and landowner engagement and community consultation guidelines including transparent reporting and evaluations and included in the SEARS process.
- Local Governments initiate Planning Scheme amendments to reflect CWO REZ land areas in local Planning Scheme.

Detailed Bias:

- The methodology in the Large Scale Solar Guideline has recast the Transmission Guidelines (cut & paste) as a basis for assessing impacts. This indicates these Guidelines have been developed in a rush and not developed from fundamental guiding principles.
- The Solar Farm Guideline and Technical Supplement are biased in favour of the proponent. For example in the Technical Supplement “scenic quality” high to low is based on subjective views where mountains have high scenic quality and slope and plains have low scenic quality.
- The visual assessment is focused on a power line from a dwelling or single point, not the array of views a neighbouring farmer may see at their workplace.

ACTIONS:

- Review Large Scale Solar Farm Guidelines relative to international practices.
- Remove bias from guidelines and support documents.

Abbreviations and references

ACERREZ	CWO REZ's licensed transmission operator, ACERREZ will design, build, finance, operate and maintain the Central-West Orana REZ transmission infrastructure for 35 years.
CRG	Community Reference Group
CWO	Central West Orana
DPHI	NSW Department of Planning Housing & Industry
EIS	Environmental Impact Statement
GW	Gigawatts
ISO	International Standards Organisation
LGA	Local Government Area
Regional Plan	NSW Government Central West & Orana Regional Plan to 2041
REZ	Renewable Energy Zone
SEARS	Secretary's Environmental Assessment Requirements
SEED	Sharing and Enabling Environmental Data Portal
SSD	Significant State Development

Central West and Orana Regional Plan 2041 (December 2022)

DPHI Large-Scale Solar Energy Guideline (August 2022)

DPHI Technical Supplement - Landscape and Visual Impact Assessment Large-Scale Solar Energy Guideline (August 2022)

Voluntary Planning Agreement Policy for Renewable Energy Projects 2023

Yours sincerely,

Lyndal McRae