

**Department of Planning and Environment  
Locked Bag 5022  
Parramatta, NSW 2124  
Wednesday, November 7, 2023**

**Re: Objection to the Central West Renewable Energy Zone**

To whom it may concern,

Thank you for the opportunity to make a submission on the proposed Central West Renewable Energy Zone. I do so on behalf of the Environmentally Concerned Citizens of Orange (ECCO). Our organisation is one of several environmental groups in the Central West which, although supportive of the transition to renewable energy, is concerned about the potential environmental biodiversity impact of doing so. We are aware of the extent of the infrastructure required if such a transition is to occur, but we are deeply concerned that the required transmission lines, substations etc. are being planned without appropriate consideration for its impact on the local environment. We are concerned that there has been an inadequate attempt to identify critically endangered species and habitat which is potentially threatened by the proposal. We are also concerned about the project's failure to identify and account for already existing offset areas, and it is unacceptable that the designated area for the project includes part of the National Parks estate.

As do all environment groups, ECCO supports a transition away from fossil fuels. However, we do not support the development of renewable infrastructure that involves destruction of critically endangered ecosystems. One such system is the critically endangered Grassy Box Woodland ecosystem which occurs in the area in question and has not been adequately considered.

Biodiversity offsetting is not an ideal solution to environmental problems, but in this case, it is essential if we are to achieve any environmental recompense for the damage which will be done by over 90 kms of transmission line and a further 150 kms of KV lines. The proposal for the development does not adequately cover offsets, failing to provide clear identification of suitable offset arrangements, such as a like for like protection of vegetation. There currently exists offset projects for coal mines in the proposed area that have not been avoided. An example of the lack of consideration for existing environmental offsets is the Wilpinjong Coal Mine Regent Honeyeater biodiversity offset requirements. The Regent Honeyeater is a critically endangered species and is protected by Federal law.

The Environmental Assessment Report for the project does not include a final assessment of biodiversity impacts. It will not be completed until the detailed design of the route is completed

and approved. By then there will be great reluctance to alter the design to accommodate essential environmental changes.

We urgently need to transition away from fossil fuels. At the same time, we need to preserve native wildlife habitat if we are to avoid a looming extinction crisis. We should be doing both, but unfortunately, plans for renewable energy (typified by the project in question) frequently conflict with environmental values. If allowed to progress in its present form, instead of enjoying the support of environmentalists and landowners, the project will be met with furious opposition as stakeholders seek to protect the environment that they love. The result will be protracted conflict, poor consultation, unacceptable delays in construction, and frequently a result that pleases nobody. The current situation has the potential to develop into a “Green Vs. Green” conflict which will not have good outcomes for either the Central West Orana Renewable Energy Zone or the environment. There needs to be developed strategies where both sides are working together to achieve outcomes which benefit both.

Time is running out for successful solutions to both the transition to renewable energy and the preservation of habitat. The current “Green vs. Green” conflict is making it impossible to provide them.

Yours sincerely  
Nick King  
Secretary, Environmentally Concerned Citizens of Orange.

President, Environmentally Concerned Citizens of Orange.