

# **WOLLAR PROGRESS ASSOCIATION**

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## **SUBMISSION OF OBJECTION Central West Orana Renewable Energy Zone Transmission**

Wollar Progress Association supports renewable energy and recognises the urgent need for a rapid transition away from the use of fossil fuel, especially coal, for power generation. All our current active members have lived with stand-alone, off grid solar generation for many years.

Our main objection to the proposed transmission project for the Central West Orana Renewable Energy Zone (CWOREZ) relates to the scale of the project and its cumulative impact. The Environmental Impact Statement (EIS) is unfinished because the final route of the transmission lines is yet to be determined.

The assessment of the project fails to consider alternative options such as an underground route or the initial establishment of large scale renewable energy projects in or near urban areas where demand is greatest. The assessment is unclear about the scale of transmission losses between the CWOREZ and main centres of demand and does not identify the additional generation required to cover those losses.

The community of Wollar is currently experiencing the impact of the construction of the Wollar Solar Farm. We have always supported this project but the increased heavy vehicle movements, including gravel trucks from a nearby quarry, has caused serious damage to local roads and increased road safety issues for local residents. The management of a significant increase in heavy vehicle movements to construct the new Wollar substation and 2 x 500 kV transmission lines is of concern to the local community.

We also have the cumulative impact of the Wilpingjong Coal Mine drilling program in the new exploration area that surrounds Wollar village and the proposed expansion of mining operations to the north-east.

The visual impact of the new transmission lines will be significant, crossing both the Wollar-Mudgee and the Wollar-Ulan roads. Concerns about the possible impacts of Electro-Magnetic Radiation have not been dispelled by the very brief and poorly communicated assessment report provided as Technical Paper 12. Increased bushfire risk is also a major concern that has not been adequately assessed.

The industrialisation of our remote rural area has been an ongoing onslaught with no reprieve. The lack of alternative options is a key failing of this assessment process.

Wollar Progress Association objects to the project SSI-48323210 for the following reasons:

## **1. Bushfire impacts**

There are two major concerns about bushfire risk from this project. One is the tight fit of the easement in the Wilpinjong to Ulan corridor adjacent to the escarpment of the Goulburn River National Park (GRNP). The other is the lack of acknowledgement that the major source of regular bushfires in the Wollar district is from the Barrigan Valley where a significant concentration of new infrastructure is proposed.

The Bushfire assessment report, Technical Paper 10, fails to identify these key issues:

- There is no map provided for the Wilpinjong to Ulan corridor
- There is no map provided describing bushfire history for the Wollar district

We are very concerned that the proposed easement route for the new 72m high transmission towers is very close to the heavily wooded escarpment of the GRNP. The narrowness of the available land in the Wilpinjong to Ulan corridor for the additional 2 x 500 kV transmission lines adjacent to the existing 300 kV transmission line between the Sandy Hollow Railway Line, Wilpinjong Creek and GRNP puts the new towers very close to the heavily wooded escarpment with an increased risk of fallen timber and arcing.

This proximity is evident in Technical Paper 3 Appendix B – topographical map B-3.

The description of ignition sources caused by transmission lines (p 64) include vegetation contact, arcing, lightning strike and a range of other equipment failures. These are significant risks in the proposed narrow corridor adjacent to GRNP escarpments.

Wollar Progress Association challenges the statement in Table 8: Strategic bushfire study (p74) that no significant impact on adjoining land would occur. The project is likely to impact on National Parks and Wildlife Service management of fire in GRNP which then has implications for other adjacent land uses, including coal mines.

Wollar has a long history of bushfire including the catastrophic event in 2017 that threatened the existing Transgrid substation next to the site of the planned new Wollar switching station. Major fires have occurred in the Barrigan Valley on a regular basis.

We also challenge the statement in Technical Paper 10 that there would be insignificant negative impact on emergency services (p73). The 2017 catastrophic fire within the proposed CWOREZ area of infrastructure development stretched the capacity of local volunteers in the Rural Fire Service (RFS).

The Wollar district has suffered a major loss of RFS volunteers due to acquisition of property and depopulation caused by the Peabody Energy Wilpinjong Coal Mine. In the 2017 catastrophic fire event local brigade units were pulled away from private property protection to concentrate on protecting the existing Wollar substation. There was no provision of assistance from Transgrid. There must be consideration of additional emergency service support to assist in the protection of new EnergyCo infrastructure in the Wollar area, which is highly prone to bushfire activity.

The EIS has failed to adequately identify or mitigate the bushfire risk in the Wollar area.

## **2. Traffic**

The traffic impact assessment provided in Technical Paper 13 fails to identify the cumulative impact of increased heavy traffic movements through Wollar village and on the roads leading to the village.

While the number of hourly movement for the construction of the Wollar switching station has been assessed as 24 per hour maximum – made up mainly of heavy vehicles (20), there appears to be no information provided about the number of traffic movements associated with the construction of the transmission lines. We understand that both parts of the project will be constructed at the same time.

There also appears to be no information about the expected period of time that these additional traffic movements will occur.

These traffic movements, at the commencement of the project, will coincide with the current intensive daily traffic movements associated with the construction of the Wollar Solar Farm. There are also regular heavy vehicle movements through Wollar village delivering gravel to the mines.

Technical Paper 13 fails to identify these cumulative traffic movements. The SEARs require a cumulative impact assessment of traffic from nearby developments (Table 1-1). The Cumulative Impact Assessment in Appendix E fails to describe or assess the specific increased traffic movements through Wollar.

Wollar Progress Association disputes the outcome of the traffic assessment that cumulative impacts would be minimal.

Technical Paper 13 Fig 5-3 shows that the traffic movement threshold through Wollar Village and on Barigan Rd is 25 movements per hour. This project is assessed to cause 24 movements per hour at peak times. The cumulative impact of Wollar Solar Farm construction traffic and other regular traffic movements through the village including mine contractors and B-double gravel trucks will bring the traffic movements well above this threshold.

The heavy vehicle movements associated with the Wollar Solar Farm have caused increased road safety risk to local residents with three accidents occurring in one week. The issue of road safety and deteriorating road condition has not been adequately addressed in the EIS.

## **3. Visual impacts**

The project will cause increased cumulative loss of rural amenity in the Wollar area. The cumulative impact of ongoing industrialisation has not been identified or assessed.

The Visual Impact Study (Technical Paper 3) identifies that the Wollar area, especially between Munghorn Gap Nature Reserve and GRNP has high scenic value including large areas of rugged sandstone plateau. The scale of the increased visual impact through this landscape has not been adequately assessed.

The visual impact of the proposed additional large transmission lines is significant, especially where they cross and run adjacent to the Wollar-Mudgee road and the Wollar-Ulan road. The

visual assessment identifies that the magnitude of impact for Wollar road is high.(Table 6.1 p 6 - 92)

Wollar Progress Association disputes the assessment that the visual impact will be low-moderate.

We also dispute the assessment that the visual impact through the mining areas will be low. This ignores the fact that the project will have a longer lifespan than the current mining operations and that final rehabilitated landforms will take the place of current mine visual impacts. The proposed large transmission lines will have a significant remaining visual impact through the corridor between Munghorn Gap Nature Reserve and GRNP for a very long period of time.

The approach taken in the visual impact assessment of using current industrial activities in the Wollar area to argue low-moderate visual impacts fails to consider cumulative impact or future land use change.

The transmission lines will remain in landscape for much longer than the coal mines.

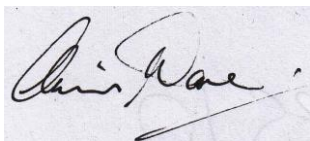
#### **4. Biodiversity**

The assessment of biodiversity impacts fails to recognise that the proposed 200m easement through Wilpinjong Coal Mine will impact an area approved to provide Regent Honeyeater species credit offsets through mine rehabilitation. The Wilpinjong Mine Extension project was approved in 2017 with a condition for rehabilitation requirements to provide habitat for the critically endangered Regent Honeyeater as an offset for vegetation removal. The calculation of species credits for the Regent Honeyeater in the EIS fails to account for the loss of approved offset area on the Wilpinjong mine site.

#### **5. Cumulative impact**

The EIS fails to identify the cumulative impact of the project on the Wollar district and local residents. As outlined above the ongoing industrialisation of a remote rural area has not been recognised but has, in fact, been used as an excuse to continue trashing the local environment and amenity. The cumulative risk to health and safety through increased bushfire risk, increased traffic hazards, increased visual pollution, increased electro-magnetic radiation and ongoing loss of biodiversity has not been assessed.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Chris Ware', is written over a light blue rectangular background.

Chris Ware  
President