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Central West Orana Renewable Energy Zone  
c/- EnergyCo  
155 Macquarie St  
Dubbo NSW 2830

**Submission to the Central-West Orana REZ Transmission EIS (SS1-48323210)**

I am a resident of Cassilis, NSW 2329. I am also a business owner, farmer & mother. I am making this submission as I object to the Central-West Orana REZ Transmission Project. After reading the EIS, it seems obvious that community engagement is not valued, As a result, I can not see how this project can offer anything but a lose-lose situation for our residents, our roads, our businesses, our agricultural production and our community. My concerns are detailed below.

<b>1. Community Consultation – General</b>
<p>EnergyCo has not followed Department of Planning and Environment guidelines in regards to community &amp; stakeholder engagement (<i>Undertaking Engagement Guidelines for State Significant Projects (DPW 2022h)</i>).</p> <p>For example, the Cassilis district is directly impacted by the project, yet at no stage has EnergyCo held a public meeting in Cassilis to engage with the community. How is the community supposed to put forward their concerns when EnergyCo hasn't even come to the village or shared any information in a physical form? As a result, most people in the area know very little about the project. This demonstrates that effective engagement has not been conducted.</p> <p>It also illustrates that EnergyCo has failed to meet DPIE Guidelines on several fronts:</p> <ul style="list-style-type: none"><li>a) <b>EnergyCo has not provided clear and concise information about what is proposed and the likely impacts for residents.</b> Eg. People living in Cassilis have not been provided with clear information regarding the increased traffic through the village. To get this information, they have to read the fine print of the EIS &amp; the associated Technical Paper. This is <u>not</u> providing clear &amp; concise information about what is being proposed.</li><li>b) <b>EnergyCo has not made it easy for the community to access information and provide feedback.</b> Eg. To date we have not seen or received a single hard copy information sheet about what is being proposed by EnergyCo. We have had to go online &amp; find the information ourselves. Some members of the community do not have the</li></ul>

skills or resources to do this, therefore they do not have a chance to be informed or have their views heard.

- c) **EnergyCo has not provided the community with safe, respectful and inclusive opportunities to express their views.** To date there hasn't been a single Q&A session in Cassilis where people can ask questions or have their concerns heard in person.
- d) **EnergyCo has not tried to understand issues of concern for all affected people and groups and respond appropriately to those concerns.** Eg. EnergyCo has not spoken to community members about the visual impacts of the project. Many people have a 'significant attachment to the aesthetic beauty of the natural landscape and its associated environmental values', but this hasn't truly been considered.
- e) **EnergyCo has failed to implement a transparent, meaningful and inclusive approach to working with communities and stakeholders.** Affected landholders, neighbours & the broader community are still very unclear about many aspects of the project. This demonstrates that EnergyCo's approach has been far from meaningful or inclusive. Communication has also not been transparent. For example, as neighbours to the proposed TWA we have only received a single vague phone call regarding plans for the site. This is not a transparent planning process. To this point, many landholders have only been issued with blurry, inaccurate maps indicating the transmission lines location. At different meetings, the transmission lines location has been different. This also demonstrates a planning process that is not meaningful or transparent. The fact EnergyCo has also sent out compulsory acquisition letters, without any prior notification of intent in writing, shows a lack of meaningful communication & a bullying tactic.
- f) **EnergyCo has not enabled stakeholder participation throughout the project development process.** As members of the community & also neighbouring landholders, we have not been directly asked for our feedback or asked about our concerns. The EIS confirms that surveys of local stakeholders has been severely inadequate. Asking three Cassilis community members & seven farmers across the whole transmission area is not acceptable or accurate, it also does not comply with SEARS requirements.
- g) **EnergyCo has not provided our community with timely information.** The time period to make a submission to the EIS was extremely short, making it near impossible for people to read & digest all of the information on time (in between their work & family commitments). If the communities views truly are valued, then this would have been considered & the time to make submission on the EIS extended further. In reality, the community should have been provided with more information well before the EIS.
- h) **EnergyCo has failed tailor engagement and communications so information is appropriate in content & context for the audience.** The complicated nature of the EIS, the size of the document and the language used, demonstrates that the different stakeholder groups have not been considered. A document of this format is hard for the majority of the population to read, let alone digest & provide informed feedback on, all in a confined time frame.

## 2. Community Consultation – Temporary Workforce Accommodation

- a) No information has been shared with the local community regarding the proposed TWA site on Neelys Lane. This is despite it being only 13km from the township. As an active community member, I speak to people daily & in the last two weeks the majority of people

I've spoken to did not know anything about the proposed TWA. This demonstrates a clear lack of effective engagement on EnergyCo's behalf.

- b) The community has also not been consulted about the TWA's Traffic Management Plan, which directs all traffic straight through the township & past the primary school, generating major safety concerns.
- c) As neighbours to the TWA site on Neelys Lane, we have not been consulted at all, or been provided with any information. We have received one phone call, stating 'potential plans' but we were not asked about our concerns. We haven't heard anything else since. Given it is located in the middle of three of our properties, our business will be severely impacted. We use the lane to move large mobs of livestock & also farm machinery between properties. EnergyCo has not asked us what mitigation measures we will need in place. EnergyCo can not claim to understand the concerns & impacts of the project, when they don't even engage with those directly neighbouring the sites.
- d) The planning maps associated with the TWA fail to include a house at 6927 Ulan Rd. It will be the closest dwelling to the TWA, yet isn't included as an impacted residence.
- e) The purchase of the private land for the Neelys Lane TWA was also unethical. The land was for sale by 'Open Offer' yet other interested parties were not given the opportunity to place a counter-bid as per standard procedures.
- f) There is significant research on the degradation of community cohesion due to TWA's. Having an additional 800 people in our community will make our family feel unsafe. In the EIS this impact is dismissed as 'perceived', which is not good enough. There is no real information in the EIS about how the impact of the TWA will be properly mitigated. To avoid these issues, the Neelys Lane TWA should be relocated further away from the Cassilis township.
- g) The EIS does not state that TWA options have been discussed with the Upper Hunter Shire Council, despite other LGA's being mentioned. This is inadequate, given the TWA on Neelys Lane is in the Upper Hunter LGA. How can citizens of this LGA believe that their concerns are being equally addressed if their local council is not involved in discussions. This demonstrates that EnergyCo has failed to meet the DPIE 2022 Guidelines which state they must 'involve the community, councils and government agencies early in the development of the proposal, to enable their views to be considered in project planning and design'.
- h) The foundation of the social impact assessment for the TWA, relies on community engagement. This has been unsatisfactorily completed regarding this TWA. This is in direct breach of both the *Social Impact Assessment Guidelines (NSW DPE 2023b)* and the *Undertaking Engagement Guidelines for State Significant Projects (DPW 2022h)*.
- i) There will be no counterbalancing benefit to the local community from this TWA. Local employment will not be improved, because as stated in the EIS, there is already low surplus labour capacity due to low levels of unemployment and there is a local skills shortage in the key occupation areas for REZ projects.

### **3. Agricultural Impacts**

- a) The EIS grossly under-estimates the economic & social contribution that farm businesses make to the local & national economy. The EIS also underrates the importance of BSAL land,

especially given the Cassilis Plateau is of strategic state primary production importance. These inaccuracies mean the impact of the transmission lines is under-estimated & inadequately mitigated.

- b) Surveying of local farm businesses has been severely inadequate. Asking seven farmers across the whole transmission area is not acceptable or accurate, it also does not comply with SEARS requirements. To give an accurate indication, all affected farmers should be surveyed, otherwise how do we know that EnergyCo hasn't selectively chosen seven farmers who's responses align with their agenda.
- c) The EIS does not include any details on how the movement of agricultural commodities will be impacted, given the extra traffic on the Golden Highway. There are minimal overtaking lanes or areas for ag-trucks to get off the road for wide-loads as it is, without the extra traffic from the EnergyCo projects. The highway is already busy with general mine traffic & mine OSOM vehicles.
- d) The mitigation measures suggested for on-farm biosecurity concerns are not realistic or practical. This demonstrates a lack of consultation with farmers.
- e) The cumulative impacts on the agricultural industry are not being addressed accurately. The total area of land being taken out of agricultural production is not limited to around the transmission lines, it also includes land that is purchased as off-sets. This is a total of 453,069 ha. This is a significant area. If this area is multiplied by the number of REZ's, then it raises the question of what value is being placed on food & fibre production
- f) The EIS demonstrates a lack of understanding of how farm businesses work. EnergyCo states that they will notify farmers five days prior to disrupting access to roads or parts of their property. This is not enough notice for most farming businesses, or any business for that matter. Farming operations are planned months in advance, To say five days notice is a mitigation measure is totally unrealistic.
- g) The Biosecurity Act 2017 aims for prevention, elimination and minimisation of biosecurity risks. Energy Co does not address the issue of their workers spreading invasive weeds as they move throughout the easements on different properties. Currently farmers are required to have a farm management program to deal with invasive weeds, yet no minimum plan has been put forward for the CWOREZ in the EIS. The practicality of washing vehicles down between properties means it will not be an effective mitigation measure for this problem.
- h) EnergyCo has failed to meet visitor protocols for many farms in the area. Landowners have stated that EnergyCo could access their property but they required personnel to meet their property protocols before entering. EnergyCo failed to do this yet still expected to be able to access their farm. A farm is a business & has visitor protocols like any other, why does EnergyCo expect to be able to ignore these?
- i) The chemical safety & residue risks is of concern. There is no mention in the EIS as to how EnergyCo will notify landholders of chemical use, withholding periods or spillages that occur on the easements on their farms. These can all have major implications for livestock health, human health & on-farm compliance.

- j) Transmission lines & TWA sites will add financial stress to many farmers in the area. Simply neighbouring this infrastructure & having it in view will reduce property values & resale potential. No mitigation measures are mentioned for those neighbouring infrastructure, only these directly hosting it. This downplays the visual impact.

#### **4. Environmental impacts**

- a) The EIS states that 9,859 hectares of native vegetation will be cleared in the CWOREZ. This is significant. Destroying land of environmental value to produce renewable energy does not make sense. Both locals & other Australians alike, value the natural capital of this area.
- b) The loss of biodiversity has been downplayed. The figures quoted for field work are incorrect, hence the impacts on biodiversity are understated.
- c) The native vegetation that is destroyed, needs to be replaced near the site, not as an off-set property in a different location. Solutions could be found in the local area to truly replace the native vegetation that is destroyed, by paying people to plant trees & create connected corridors for the impacted wildlife. None of these options are considered in the EIS, which demonstrates a true lack of care or understanding for our flora & fauna.

#### **5. Social Impacts**

- a) EnergyCo hasn't given any thought to the demographic of our rural community. The fact that all information & submissions are geared up for electronically savvy personnel, neglects the fact we live in an aging community. As a result, many people don't have the opportunity to find information, ask questions or provide feedback, which is a question of equity and discrimination. It also demonstrates social injustice on EnergyCo's behalf.
- b) There is a gross imbalance of power in the planning process. A team of people have compiled a mass of EIS planning documents, yet its presumed individuals are able to allocate sufficient time, outside their professional & personal lives, to evaluate the entire document. EnergyCo is once again making it near impossible for the community to provide feedback
- c) It seems unjust that Energy Co have had months to prepare the EIS however constituents of this area have only had one month to read, analyse and prepare submissions. Where is the equity in this?
- d) The EIS describes the social impacts for the Cassilis Community as 'high' for several factors associated with the TWA on Neelys Lane. However, there are no effective mitigation suggestions mentioned in the EIS. What the document also doesn't consider, is that there is another TWA being proposed by Tilt close to the Cassilis township aswell. This means the social impacts will be significantly higher. While EnergyCo doesn't feel the need to consider the cumulative impacts, the reality is that our community will have to deal with them.
- e) The thought of another 5000 people living and travelling in the CWOREZ area and two potential TWA's adding 1400 people to the Cassilis area is daunting. How is our small community expected to still feel safe?

- f) Having to share the few services we have because of this huge increase in population is concerning. This is an increase of over 1000% in our population with no mitigation measures stated in the EIS. There has been little reference to the day-to-day impacts that we will have to live with.
- g) The majority of residents will be receiving no financial benefit from the project, yet will be faced with TWA's, transmission lines across the landscape & a negative impact on our local roads. What is the positive in this project for the majority of the community? Community Enhancement Funds do not address this problem. They are insignificant given the scale & impact of the project.
- h) It is insufficient for EnergyCo to state these impacts are only 'perceived'. They have no experience living in our area, therefore have no idea of how the changes will impact us.
- i) The mental health of local community members, especially farmers, has not been considered. The poor consultation & lack of transparent planning has left many worrying about whether their lives & businesses will be significantly, negatively impacted or not. The lack of consideration EnergyCo has given to the mental health of our residents is appalling & as a government entity they should do better.
- j) The social impacts of the project can not be listed as 'low', simply because our population is low. The truth is actually the opposite, the impacts will be extremely high, because every single person will either be looking at turbines, looking at transmission lines or looking at extra traffic every single day.
- k) Most citizens love the rural ambience of their area and are dreading the industrialisation of a peaceful, predominantly agricultural region. The loss of our quiet, rural landscape is undervalued by EnergyCo and poorly addressed in the EIS. There is no reference to how rural communities love their environment & how it creates their sense of place.

## **6. Safety & Traffic**

- a) The traffic through Cassilis from the Neelys Lane TWA & other associated construction vehicles, generates major safety concerns. These issues are not identified in the EIS & no mitigation plans are mentioned. If EnergyCo genuinely cares about the safety of our community these issues would have been identified & addressed already.
  - Eg. The bridge leading into Cassilis has also not been included in the EIS. It is narrow & doubles as bridge for cars & pedestrians. It is regularly used by people traversing between the township & Memorial Park (tennis courts, Bowling Club, Caravan Park, church), as there is no other pedestrian access. This safety issue is listed as 'negligible' in the EIS and consequently there are no mitigation measures suggested. Our residents deserve to be able to move throughout the town safely. A suggestion would be building a pedestrian bridge over the Munmurra River.
  - Eg. Safety of students & staff at Cassilis Public School. There are no footpaths to the school. Children currently have to walk on the edge of the road. How will this be safe with the increased traffic? There is also no pedestrian crossing anywhere in town for the students to cross the road. A suggestion to improve safety would be the construction of footpaths too & from the school to give students a safe place to walk. There is also no turning lane for teachers or parents to get in or out of the school.

- b) The assumption that the Golden Highway is going to be minimally impacted is false. The cumulative impacts of multiple projects in the region aren't being considered & traffic counts done by EnergyCo are inaccurate. This is because the counting equipment around Ulan Rd has been located in positions so it avoids counting Ulan mine traffic. This means traffic on this part of the highways has been grossly under-rated. This is either a professional oversight or deliberate manipulation.
- c) It is noted that there are 11 projects where there is a direct overlap. A number of these projects will be impacting on the Golden Highway, however there is no indication of the total increase in traffic. Each project is just considering their impacts in isolation. When will the citizens of the Upper Hunter Shire Council be adequately informed about the cumulative impacts and what is being done to mitigate them?
- d) There is no detailed information about how the Golden Highway will be upgraded. Given the lack of over-taking & turning lanes, it is already a dangerous road. Given it is the route for the majority of the infrastructure coming from Newcastle to the CWOREZ, then surely there should be detailed upgrade plans. These plans also need to be executed before the influx of traffic begins.
- e) The EIS incorrectly states that the Coolah Road is a dual lane road capable of 100 kms an hour based on LOS thresholds. This is where a desktop analysis is inappropriate as it does not take into account local conditions, topography & road conditions. In reality, the road is very rough, narrow & unsafe in many areas. Visibility is also poor due to dust.
- f) Locally there is also the issue of no turning lane from the west, when you enter Cassilis.
- g) No benchmark noise assessments have been conducted for Cassilis. How can EnergyCo determine the level of noise mitigation required, if a benchmark has not been set? This seems like a professional or deliberate oversight, how can a plan be approved that does not consider the noise implications on residents & school students?

## **7. Bushfire safety**

- a) EnergyCo has identified the majority of the land around the Cassilis end of the transmission line as Category 1 - Bushfire Prone. This is the highest bushfire risk category. They have also identified that the risk of bushfires from project construction activities will be extreme. Despite mentioning mitigation measures, the reality is that the risk of a fire starting and spreading is extremely high. Is EnergyCo going to provide additional fire units and fire-fighting personnel for the Cassilis community? Or will EnergyCo increase the fire risk but not contribute to community protection?
- b) It is essential that any additional firefighting resources are directly associated with our local brigade, this ensures common goals & utilises local knowledge. Extra personnel also need to undergo training with the local brigade. Local fire-fighters have not been contacted by EnergyCo to date, to discuss their concerns or seek their input into planning.
- c) It is essential that our community is provided with 'legacy' firefighting resources. After construction has finished, we can't be left with an increased fire risk, yet no additional resources.

- d) The dangerous nature of powerlines, on hot, windy summer days, is not explored in the EIS. They significantly increase the fire risk in the area, yet no mitigation measures are mentioned,
- e) EnergyCo does not mention any compensation for landholders who may be burnt out as a result of a fire started by EnergyCo. This could have devastating environmental & financial impacts. Given EnergyCo's activities increase the risk of fire & put others in danger against their will, they should have adequate compensation plans in place.
- f) There are no details in the EIS on how the transmission lines will impact aerial fire-fighting efforts.

#### **8. Compliance with SEARS**

- a) The SEARS document stated that the EIS must include a detailed evaluation of the merits of the project overall. This has not been completed as there is not a detailed evaluation of alternative energy sources or the opportunity cost of the project as a whole. When you consider the cumulative economic, social & environmental costs, alongside the sustainability issues, it appears the project needs further evaluation.
- b) In the EIS EnergyCo has only outlined how much power they will be able to transport from the CWOREZ. They have not explained explicitly the benefits for consumers and whether this plan will actually result in cheaper energy for customers. This means that EnergyCo has fallen short on their requirement to assess the merits of the project as a whole.
- c) According to the SEARS, Energy Co were required to engage with community groups. This has not occurred in the Cassilis village or surrounding districts.

The cohesion, productivity & scenic amenity of the Cassilis district makes it a great place to live & run a business. The project being planned by EnergyCo & outlined in the EIS, will have a negative impact on all the aspects we love about our community. The lack of information & engagement to date demonstrates EnergyCo's disregard for our environment, our farmland & our people.

Sincerely,



**Shelley Piper**