

Department of Planning and Environment

<https://www.planningportal.nsw.gov.au/major-projects/projects/central-west-orana-rez-transmission>

SUBMISSION OF OBJECTION

Central-West Orana Renewable Energy Zone Transmission Project

Introduction

Mudgee District Environment Group (MDEG) has been working for the conservation and protection of our environment and community for more than 30 years. MDEG is represented on the Community Reference Group set up by EnergyCo for the Central-West Orana REZ Transmission Project (CWOREZ project).

MDEG supports renewable energy and a speedy transition away from fossil fuels. However, for the REZ rollout to deliver these objectives, it must be genuinely consultative and open to all feedback and possible revision.

All aspects of the REZ must be assessed for collaborative potential between the Network Operator and Foundation Generators, and among all generators – some of whom have projects outside but adjacent to the REZ. Based on the EIS description, we believe the CWOREZ project could be delivered with less community upheaval, include innovative planning and collaboration which would leave a positive legacy for REZ localities, and reduced biodiversity impacts.

We have addressed some key matters under the headings below.

Workforce accommodation camps

The camps will introduce a large number of additional people into localities that currently have a very sparse population. At the end of the project when the camps are disbanded, there will be no residual legacy or benefit to the locality, the community or the region. This will be the case for all generators providing an accommodation camp for their workforce. As the Central West is experiencing a critical housing shortage, it would be logical for the workforce accommodation to consist (to a large degree) of housing that would be utilised into the future.

The housing considered must be suitable for a low-energy future, address diverse physical needs and facilitate a positive lifestyle for residents. Such housing may consist of studios, 1,2 and 3 bedroom homes, dormitory (eg shearer's quarters), eco-village cluster, tiny homes, relocatable homes and modular homes. The proposed housing may already exist but not be recognised eg shearer's quarters. New housing brings the opportunity for new industries to establish in the Central West.

Members of the workforce would be able to bring family and/or friends to visit the Central West, bringing an economic benefit.

The success of addressing workforce accommodation requirements and addressing the housing shortage together in this way, depends on willingness to collaborate and innovate. A high priority for positive social licence and long-term community benefit is also needed.

The full range of benefits of this approach and strategies to achieve it are outlined in Appendix A.

Biodiversity impacts

The biodiversity impact of the CWOREZ project has not been fully assessed as the final route has not been decided. The cumulative biodiversity loss described in the EIS (Appendix E) minimises the loss calculation. Not all of the *proposed* generation projects (and other large developments in the region) have been included. The estimated biodiversity loss is unacceptable.

MDEG believes that the cumulative loss to biodiversity is a major threat to ecological communities and individual species. The total estimated clearing of almost 10,000ha cannot be justified. The impacts described on wildlife connectivity and habitat corridors equally cannot be justified.

We urge a review of the planned easement. It currently crosses Durridgere State Conservation Area, and existing biodiversity offset areas for Ulan, Moolarben and Wilpinjong Coal Mines. These impacts are not acceptable.

The EIS presents the view that a transmission easement 'through bushland' or 'across mine land' is more acceptable than over farmland. This view is unacceptable and indicates the lack of consultation that occurred regarding the Revised Study Corridor. It appears that biodiversity loss is acceptable to EnergyCo and keeping the farmers happy is all that matters.

There is no offset strategy available for public comment. There is no indication that like-for-like offsets will be available. The highly criticised current offset system does not suffice to protect endangered ecological communities or threatened species.

MDEG strongly objects to the offset concept that results in a net loss and allows additional biodiversity decline in the Central West, as exemplified in this project.

Reliance on detailed design and construction planning, management plans and strategies

There are many aspects of the CWOREZ project which are not presented in detail. There is much that will be addressed in 'detailed design and construction planning'. This is cause for concern.

MDEG urges that all such plans be available for comment and feedback. Community knowledge of these details and feedback provided will enable a considered and refined project to be delivered that has social licence. Publication of these plans will also alleviate concerns about lack of information and lack of transparency.

We ask that consideration be given to the concerns raised in this submission.

Sincerely

Rosemary Hadaway

Chair, Mudgee District Environment Group.

Wednesday 8th November 2023

APPENDIX A

Renewable Accommodation in CWOREZ

Aim

Provide affordable, appropriate housing for key workers (short-term) that can be re-purposed for housing for the community (mid and long-term).

- Low running costs
- Comfortable
- Safe
- Low environmental impact

Strategy

Councils, the network operator and all generators collaborate to achieve diverse housing styles in a variety of locations that address the identified accommodation needs.

Housing Features

- Passive solar design: EG, living areas on northern side, minimal glazing on western side, wide eaves, light-coloured roofing, insulation. See <https://www.yourhome.gov.au/passive-design>
- Sustainable living: EG, shading, appropriate landscape and garden design to encourage vegetable and fruit growing and reduced fire risk, water tanks, EV charger, compost toilet, micro-grid, roof top solar. See <https://www.yourhome.gov.au/live-adapt/landscaping-garden-design>
- Liveable Housing inclusions: EG, wide doorways and corridors, (at least) one step-free entrance, hob-less shower recess. See <https://livablehousingaustralia.org.au/lha-silver/>
- Diversity of built forms: EG, studio, 1,2 and 3 bedroom homes, dormitory (eg shearers' quarters), eco-village cluster, tiny homes, relocatable homes, modular homes.
- Complimentary design that acknowledges and respects heritage/streetscape EG protect existing landscape – no ridgeline development, revegetation using local species, sympathetic to village/locality aesthetics.

Inputs to housing collaboration planning process

Councils

- Population statistics
- Land use and releases
- LEPs

Network Operator and Renewable Generators

- Number of workers
- Timelines
- Locations

Funding

- Network operator and generators – Community Benefit Funds. Initial capital to build affordable housing to be recouped later via sales of housing units.
- Partnerships between generators and housing construction companies

Benefits to network operator and generators

- Worker provision and happiness
- Social licence
- Illustrates social and community focus of projects
- Significant positive addition to company portfolio and image

Benefits to councils

- Known reserve of housing stock, and timeline of availability
- Community acceptance of additional housing – this is a strong concern for residents, as evidenced in the Submissions of Objection to current solar and wind proposals.

Opportunities

- Construction companies (EG tiny homes, relocatable homes, modular homes) establish in CWO
- Future tourism potential of additional accommodation – balanced against housing needs.

Risks/unknowns

- Land ownership/tenures/agreements

Additional collaboration potential

- Shared workforces among network operator and generators – in principle agreement, to be refined as timelines are developed. Aim: reduce required personnel numbers and reduce pressure for housing/accommodation.
- Car/work transport share scheme. Aim: reduce wear and tear on local roads, reduce emissions, save costs for employers.
- Cross-promotion/sponsorship with housing construction companies.