

Stratford Pumped Hydro & Solar Objection Submission 29th October 2024

I object to SSI-73368213 based on the following concerns:

- The views of the local Gloucester and Mid Coast communities were not considered prior to the declaration (change) of this SSD project being classified as SSI.
- **Community Engagement:** The sole use of drop-in sessions, without utilising community question and answer sessions or community/public meetings are an unfortunate way of limiting education and understanding within a community. Limiting successful engagement practices and only utilising drop-in sessions is not conducive to transparently and fairly engaging a community.

The *Undertaking Engagement Guidelines for State Significant Projects* state that **“Engagement is about transparency and fairness. and Engagement is about facilitating a civil dialogue that can explore whether differences can be addressed and needs met. If this doesn’t happen, clear reporting should show why this is not possible, together with an identification of what has changed and why.”**

The *Undertaking Engagement Guidelines for State Significant Projects* also states that **“The Department expects proponents to consider the core values and public participation spectrum of the International Association of Public Participation (IAP2) when developing their engagement strategy.”**

There has been no demonstrated attempt to meet the public participation goals or promise to the public as clearly identified in The *International Association of Public Participation (IAP2)* to Inform, Consult, Involve, Collaborate and Empower the public.

- **Transmission upgrade assessment crucial** - The “Potential Transgrid Electricity Transmission Line Upgrade (Not Part of the Project)” displayed on Figure 1-1 of Page 10 of the EIS is quoted as “not part of the project”. The assessment of this necessary upgrade to Transmission Infrastructure **MUST BE INCLUDED** in the Environmental Impact Assessment of this project.

“The NSW Supreme Court of Appeal has upheld an appeal against the Bowdens silver mine project near Mudgee. - The court found the state's Independent Planning Commission failed to consider the impacts of a transmission line when it granted the approval in 2023.” – ABC News

This legal precedent suggests that this transmission upgrade needs to be included in this assessment. **Landowners under this “potential” transmission corridor upgrade** have the right to know now, and consider this project’s impacts in relation to what will be potentially significant impacts on their homes and farms.

- **Additional Native Vegetation Loss** - 145HA native vegetation loss, in addition to the total quantity of native vegetation lost during the establishment of the Stratford Mine Complex.

- **Unmet Rehabilitation conditions of the SMC and SMC Extension** - The Rehabilitation conditions set for the Stratford Mine Complex have not been met for the site, as indicated in the original Rehabilitation goals of the SMC and the Stratford Extension Project. Please see below conditions as displayed on **Page 3 of the Stratford Extension Project SECTION 5 REHABILITATION STRATEGY**

5.1.1 Stratford Coal Mine

To date, the general objectives of the SCM rehabilitation programme have been the minimisation of erosion and general reinstatement of pre-mining land capability (SCPL, 2010a). Section 4.3 provides a discussion on rural land capability and agricultural suitability in the Project area and surrounds. Other objectives of rehabilitation are (SCPL, 2010a): • the generation of a final rehabilitated landform which is consistent with general landforms in the area and which would blend in with the hills to the east; • to provide a landform which is suitable for the primary final land uses of grazing, forestry and fauna habitat enhancement; • to plan mining and overburden handling operations to minimise rehandling, reshaping and contouring; • to minimise the amount of disturbed land awaiting rehabilitation; and • to provide for the safe and environmentally acceptable disposal of CHPP rejects. Rehabilitation goals for the SCM are set by Condition 35, Schedule 3 of DA 23-98/99 (Table 5-1).

Table 5-1

SCM General Rehabilitation Goals

Feature	Objective
Mine site as a whole	Safe, stable and non-polluting.
Other land affected by the development	Restore ecosystem function, including maintaining or establishing self-sustaining eco-systems comprising: • a wildlife corridor; • local native plant species; and • a landform consistent with the surrounding environment.
Final voids	Safe, stable and non-polluting.
Community	Minimise the adverse socio-economic effects associated with mine closure.

Are conditions imposed on State Significant Developments not worth the paper they are written on? Is this indicative that they can be superseded or not upheld? These rehabilitation conditions contributed to the original approval of the SMC and SMC Extension and were a commitment made to the Stratford and Gloucester Communities. If the legislation and planning approval process is as strict and well-governed as intended – the conditions should be upheld.