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Coonabarabran - Coolah - Dunedoo - Baradine - Binnaway - Mendooran

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Please address all mail to:  
The General Manager

Please refer enquiries to Leeanne Ryan  
Folder ID 18327

20 March 2024

EnergyCo  
GPO Box 5469,  
SYDNEY NSW 2001

Submitted via email:  
[Roadmap.communications@dpie.nsw.gov.au](mailto:Roadmap.communications@dpie.nsw.gov.au)

### **Draft Central-West Orana REZ Access Scheme Declaration**

Warrumbungle Shire Council ('Council') thanks you for the opportunity to provide feedback on the Draft Central-West Orana REZ Access Scheme Order 2024 and associated Guideline document.

As you are aware, Warrumbungle Local Government Area ('LGA') is an integral part of the Central West Orana REZ ('REZ'), with eleven proposed generation facilities and a major transmission line planned to be located therein. Across the whole REZ there are 35+ projects.

Council's comments herein relate primarily to the Draft Central-West Orana REZ Access Scheme declaration, with additional comments that relate to the Central-West Orana REZ Access Rights and Scheme Design Position Paper and Draft Guidelines for the Access Scheme Declarations.

Council acknowledges that the published updates to the Access Scheme declaration amendments are of an administrative nature, however they enable fast-tracking of the application process. In summary:

- The Infrastructure Planner no longer needs to consult with the Consumer Trustee for amendments to the eligibility criteria for the application process; and
- Access rights may now be granted to an operator, or increase the maximum capacity of an approved project, after the Infrastructure Planner conducts an application process or where the Consumer Trustee recommends it.

In essence, these amendments give EnergyCo as the Infrastructure Planner a fast track for changes to the application process and approvals without having to rely on the Consumer Trustee process.

**Council is generally supportive of the Access Scheme Declaration and Draft Guidelines however, on balance, its strong concerns – thus objections – outweigh the positives and hence this submission is lodged as an objection. Council does not**

**support the fast-track of the above-mentioned processes whilst cumulative impacts are yet to be adequately addressed by EnergyCo, any energy developer or the State Government more generally.**

### **A. Cumulative Impacts**

The Draft Guidelines detail that the Minister will consider the characteristics of the REZ (built and natural environments and communities impacted by the implementation of the access scheme) when specifying an access scheme network. Council is not aware of any detailed assessment of such issues for the CWO-REZ, particularly the cumulative impacts to be attributed to the transmission project and connection of an undisclosed number of Generator projects.

Council has raised the issue of cumulative impacts in the majority of submissions for Renewable Energy Developer Proposals, the EnergyCo Transmission Line Project and the Renewable Energy Guidelines. These concerns have not been adequately addressed in any response received to date, with Energy Developers continuing to offer incomplete and inadequate cumulative impact assessment commentary. Meanwhile, the cumulative impact assessment commentary offered by EnergyCo on its Transmission Project similarly remains unsatisfactory.

Likewise, Council does not agree that the Access Scheme Declaration or related documents provide transparent or complete cumulative impact assessment details and is concerned they may not have been adequately addresses.

The Transmission Project acknowledges that not all REZ-related cumulative impacts can be addressed through a project level approach alone, requiring a region-wide, collaborative approach between EnergyCo, Renewable Energy Developers, Councils and Government agencies, hence the development of the *Central West Orana Renewable Energy Zone- Coordinating Community Impacts and benefits in the REZ (EnergyCo, 2023)*. The report outlines the key findings of investigations into how potential cumulative impacts will be mitigated within the CWO-REZ while also providing long-term benefits to the community. This Guideline should be applied to the assessment of the cumulative impacts of the Access Scheme.

### **B. Community and Financial Benefits.**

Council, together with its residents and ratepayers, is very much focussed on the transparency of the likely environmental, social, and economic costs and benefits arising from the access granted to energy developments (both singular and cumulative) and to ensuring that such costs reasonably attributable to the developments are carried by the developers and not outsourced to the LGA community to bear. The content of the Draft Guidelines for the Access Scheme is thus a key issue for Council, since it also provides for community benefits administered through the Scheme's financial vehicle.

The allocation and use of funds is of interest to Council by way of the potential funding of local infrastructure referred to in Section 6 of the Access Scheme Position Paper. Council does not support the funding of infrastructure which is to become a financial burden on the Council in the future and requests input into any decisions regarding funding of local infrastructure.

Council looks forward to discussing the contents herein with EnergyCo. In the first instance please contact Council on 02 6849 2000.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Lindsay Mason', with a long horizontal flourish extending to the right.

**LINDSAY MASON  
ACTING GENERAL MANAGER**