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07/10/2023

Natasha Homsey

Planner

NSW Department of Planning and Environment

Department of Planning and Environment, Locked Bag 5022, Parramatta NSW 2124

Subject: Objections/Concerns Regarding Central-West Orana REZ Transmission Project

Dear Ms Homsey,

I hope this message finds you well. I am writing to express my concerns and objections regarding the Central-West Orana REZ Transmission Project that is currently under consideration. While I fully appreciate the efforts and intentions behind the project, I believe it is crucial to address the following issues before proceeding further:

**1. Lack of community engagement:** While EnergyCo propose that they have engaged strongly with the local community, their methods of engagement and consultation with community members that will be directly affected, neighbouring or across the Central-West community in general would indicate otherwise. As it is identified by EnergyCo that it is a crucial component of their engagement strategy is to meet the engagement guidelines set out by several governing bodies, it is glaringly obvious that they have approached this in a tick box manner and have not in fact consulted well with all stakeholders. EnergyCo engaged organisation WSP to undertake social impact studies. WSP saw that it was suitable to conduct just **44 interviews**. These were conducted face to face, via telephone, and online. These 44 interviews included councils, land hosts, neighbours and community organisations.

There was also mention of a public survey that was distributed to landowners in the study corridor, where it was noted that the surveys were then distributed more widely by survey recipients as from 80 identified surveys there were 104 responses. These surveys were open to completion between 10/11/2022 and 08/12/2022, right when many of the agricultural landowners would have been undertaking harvest. By the further distribution of surveys from these landowners it is obvious that

community members saw the need for greater input of the broader community beyond the short-sightedness of WSP.

It is identified in the same study that the **population of the affected region is 152,418**, and of the **local social locality 20,449**. I am unsure how both EnergyCo and WSP see that gathering the perspectives of just 148 members of the Central-West is a strong measure of social impact.

It is directly stated by the DPIE's own guidelines *Undertaking Engagement Guidelines for State Significant Projects (DPIE October 2022) 3.3 Effective engagement occurs when the community, councils and government agencies have the information they need to understand a project and its impacts, and are given the opportunity to participate in a meaningful way. Effective engagement can give a proponent first-hand insight into what people value and how they expect a project will affect them.* Based on this and considering the number of community members directly surveyed by WSP on behalf EnergyCo, that EnergyCo have not fulfilled this guideline.

Furthermore, with WSP seemingly cherry-picking social respondents from the Central-West, they are in direct violation of international guidelines regarding major project development. *Quality Assurance Standard for Community and Stakeholder Engagement (This Quality Assurance Standard was endorsed by the IAP2 Federation in May 2015 and is recognised as the International Standard for Public Participation practice.) Code of Ethics: 7 Respect for Communities: we will avoid strategies that risk polarizing community interest or that appear to 'divide and conquer'.* By sampling just 148 members of 152,418 members of the affected project area, this would be seen to be violating this standard. While EnergyCo have had other community consultation and stakeholder events, there is no evidence on how perspectives were gathered and whether attendees of such event even resided in the project zone.

Based on this lack of engagement and poor representation of social impact, this project should not be approved. For consideration for approval, EnergyCo need to demonstrate:

- Direct engagement with a broader cross-section of the population of the Central-West that is statistically meaningful.
- Transparency around the types of questions asked of community members and how these meaningfully correlate with areas of social impact.
- Demonstrating that EnergyCo do understand the activities of local agricultural businesses and avoiding core primary production windows such as seeding and harvest when planning consultation events.

**2. Significant impact on land use and agriculture:** EnergyCo have identified that the corridor for the Central-West Orana REZ Transmission Project has been carefully chosen to reduce impact on national parks and agriculture. Despite this statement within the EIS, there are currently many agricultural landowners affected by this corridor as it heads into the Central-West. As outlined in *COMMUNITY ENGAGEMENT GUIDELINES FOR BUILDING POWERLINES FOR RENEWABLE ENERGY DEVELOPMENTS A guide for proponents, landholders and communities December 2018 (Clean Energy Council)*:

*We will minimise the impacts on highly productive agricultural land where feasible and explore opportunities to integrate continued agricultural production into the project.*

EnergyCo have identified that they have entered an acquisition process to purchase easement from landowners that are currently engaged in highly productive agricultural activities. In the same engagement guidelines set out by the Clean Energy Council (2018), it states: *SIGNING AN OPTION AGREEMENT TO HOST A POWERLINE Should a landowner be willing to host a powerline corridor on their property, the proponent will work with them to negotiate an 'option' agreement. This agreement, which is a contract, details and records a negotiated arrangement between the proponent and the landowner for the hosting of the powerline within a defined corridor, should the project proceed. See Appendix 4 for a checklist of items that should usually be covered with an option agreement. It may take years before the design of a large-scale project is completed and receives all the necessary planning and environmental approvals and financing in order to proceed. It is important that proponents regularly provide project updates to relevant landowners. Only once these approvals are in place will the option agreement be exercised and converted to a legally binding agreement and/or the alignment corridor included in the land title. In some cases, after years of groundwork, projects may not proceed, and the option will never be exercised*

It has been reported that there are a number of landowners in the project corridor that do not want to host transmission lines and are thereby rejecting option agreements:

<https://www.dailytelegraph.com.au/news/nsw/farmers-call-for-more-negotiation-with-nsw-government-over-land-acquisition/news-story/7d9ffd3b1daf4af4a06c1509ed3a5cde>.

Within the EIS, EnergyCo identify that they have already entered the negotiation process to acquire land as set out by *Land Acquisition (Just Terms Compensation) Act 1991 (Just Terms Act)*. This action appears to be in direct violation of the above-mentioned guideline set out by the Clean Energy Council. As this project is only in its EIS exhibition stage, should EnergyCo have entered the acquisition process?

Additionally, it has been identified in the EIS *Technical Paper 7 – Social* that there is likely to be an 'Unequal distribution of impacts' on both landowner's hosting transmission poles and landowners neighbouring poles, with one of the most significant impacts identified is the impact on livelihoods due to biosecurity threats. There were further recommendations on the actions EnergyCo could take to reduce this risk, but even so the risk remains as having a certain impact on these groups of people. Through compulsory acquisition, EnergyCo is directly violating the rights of agricultural landowners as EnergyCo recognise that the transmission lines will certainly pose a risk to biosecurity and in turn this will impact the ability of agricultural landowners to produce an income. It is chartered in *United Nations General Assembly. The Universal Declaration of Human Rights (UDHR)*. New York: United Nations General Assembly, 1948, under Article 23 that everyone has a right to work and income. With EnergyCo ignoring the impacts of this project and proceeding with compulsory acquisition it is directly violating this right for agricultural landowners. It is even identified in the *Land Acquisition (Just Terms Compensation) Act 1991 (Just Terms Act)* that this process is based on land valuation and does not take into consideration the impacts on current and future income.

Based on these points, I strongly object to this project. What I would like from this:

- The Central-West Orana REZ Transmission Project is rejected and forced to revoke any progress made in the acquisition of land for this project as this has been done in direct violation of the guidelines identified above.

- Formal apologies and the consideration of compensation to landowners by EnergyCo, who have felt forced into this acquisition process.
- No transmission line projects to go ahead until the feasibility of undergrounding transmission lines takes place.
- If these actionable points are not strong enough and the planner still sees fit to approve the project in some capacity, that it is only approved with underground transmission lines.

**3. Incorrect identification of affected localities:** While this point may seem petty in the face of other more serious impacts, upon reading EIS *Technical Paper 7 – Social*, it became apparent that there were a number of incorrect identification of place names and locations. For example, in table 3-1, there are several local place names that had been incorrectly identified or completely excluded. I will not do the editing work for WSP and EnergyCo, but one example is ‘Canadian Lease’. As a former resident of Lahey’s Creek, with relatives and friends still residing in the Medway and Spring Ridge localities, I encourage WSP and EnergyCo to discuss the importance of place names for their own risks of having workers in such areas that may require the services of NSW Fire, Police or Ambulance.

Additionally, in the *Central-West Orana Renewable Energy Zone Transmission Project Non-Aboriginal Heritage Assessment*, an item of family significance, and obviously heritage of the Lahey’s Creek area is the Falconer Family Graveyard, or as it is incorrectly identified, *Lahey’s Creek Cemetery – CWO-22 HH06*. The family graveyard still sits within the Will of my father in-law, Garry Glencross, to be buried along side his ancestors. As direct family descendants, we had not been consulted about the graveyard or the contemporary meaning it continues to hold. I did notice that this part of the EIS was able to correctly name and identify localities, perhaps WSP and EMM needed to have a conversation about locations and areas that will be directly impacted by this project.

Again, this level of oversight demonstrates a lack of engagement and proper assessment of the local community, I object to this project, and I recommend:

- The EIS and all parts be thoroughly reviewed and properly edited prior to submission.
- The lack of attention to detail is concerning and the EIS needs to be redone in its entirety and ensure all parts contributing to the EIS communicate to demonstrate the accumulative effect of this project on residents of the Central-West, particularly in the localities that have failed to be identified but will be significantly affected and transformed by this project.

**4. Poor identification of services to support needs of community and workforce relating to the project:** As a Social Worker currently working in the field of mental health, I was curious to see how EnergyCo were going to support the impacts on mental health this project will have on the affected residents of the Central-West, as well as supporting their own workforce.

As identified by the Australian Institute of Health and Welfare (2023): *Social isolation and loneliness can be harmful to both mental and physical health. They are considered substantial health and wellbeing issues in Australia because of the impact they have on peoples' lives.* Given that WSP have identified in their social studies of the Central-West community that many of the workers will need to travel into the community from other areas, the risk of these workers experiencing social isolation and loneliness increases. WSP have provided a scope of hospitals, multi purpose centres, GP’s and emergency services within EIS *Technical Paper 7 – Social*. What WSP failed to acknowledge was the

mental health service available in our local area, especially considering the impact that the geographical location of their workers will have on their worker overall well-being. It was reported by NSW Mental Health Commission in 2022 that less than 22% of people in regional NSW had good access to mental health care, and there was an increase in suicide in regional NSW from 2021 to 2022(15 in 100,000 deaths, to 16.9 in 100,000 deaths)

<https://www.nswmentalhealthcommission.com.au/sites/default/files/2022-12/Reporting%20on%20the%20mental%20health%20and%20wellbeing%20of%20Regional%20NSW%20-%20Nov%202022%20-FINAL.PDF>. This project risks placing greater pressure on and already inadequate mental health system in Central-West NSW.

As indicated in their paper, most services WSP identified are seriously under resourced, with many local residents waiting weeks to see a GP or going without basic health care:

<https://www.abc.net.au/news/2023-07-21/gp-shortage-at-coonabarabran-western-nsw-long-wait-times/102614928>, <https://www1.racgp.org.au/news/gp/professional/general-practice-wait-times-longer-than-acceptable>. What WSP fail to acknowledge in their assessment is the cumulative impact

of numerous major projects all being developed at once and how this is going to impact our mental and primary health services available in the Central-West. Additionally, accessing a GP is a crucial step in care for accessing mental health services (GPs provide mental health treatment plans and monitoring of mental health conditions), with the region already having poor access to both GPs and mental health clinicians, this puts the residents of this area at greater risk of adverse health and mental health outcomes through strain on available resources. It is clearly identified in the social impact study Table 4-9, that one of the most commonly occurring long-term chronic illness is mental health related illnesses at a rate of 12.4% in the Western area.

So, lack of services to support this project will indefinitely put the workers of this and other projects at risk, and after this installation of this project, the ongoing risk to residents include: *Any voltage that causes sufficient current to pass through the heart – such as that found in live overhead power lines – can cause serious injury or death. The discharge of electrical energy from contact with power lines can also cause serious burns, fires and explosions that can immobilise the equipment involved. You don't even have to have direct contact with a high voltage line to receive a fatal electric shock. Electricity can arc or jump across gaps, meaning that simply being too close can kill. Even if a worker survives a close encounter with high voltage, their injuries can require intensive medical care and may render them out of action indefinitely (Safe Work NSW, 2023).*

Based on these points, I object to the development of this project as the risk it poses to the health of the residents of the Central-West and workers within the project are too high. I recommend:

- The completion of a cumulative impact study be conducted to properly assess the impact on all emergency, health, mental health and allied health services available in the Government identified Central West REZ.
- A halt to all projects in the Central West REZ until capacity of critical services can be increased.
- The requirement of undergrounding high voltage transmission lines to reduce the ongoing risk to residents and workers on such projects if this and other transmission projects are seen to be fit to approve.

**5. Lack of objective measures on mental health, well-being, stress and social cohesion:** Upon revising questions used by WSP to assess affected landowner and community members experience of mental health, well-being, stress and social cohesion and how the project will affect these domains, it is difficult to understand how WSP was able to effectively measure these proposed items that have been scaled in the EIS *Technical Paper 7 – Social*. WSP identified that they interviewed 44 council members, land hosts, neighbours and community organisations. As a mental health clinician, I do not know of any objective or subjective measures that could possibly identify and scale mental health, well-being, stress and social cohesion experienced by the diverse groups interviewed, and then look at how this can be monitored in the future to see whether mitigation measures do in fact support these domains to improve these outcomes with the proposed groups.

My thoughts are that WSP developed subjective conceptualisations of these constructs and used questions they formulated to measure what they perceive these constructs entail. As a group that advertises itself on achieving outcomes for major projects globally, it is questionable how WSP are able to consistently have outcomes that can be mitigated through their own identifiable measures? I would suggest that WSP are only proposing questions that they already have answers for, thereby reducing the problematic impacts of the project by not attempting to measure the unique effects on each community member and agricultural business owner it approaches. It is similar to me as a mental health clinician assuming my clients have explicit knowledge of all domains of their mental health and I could just ask a few yes/no questions to measure the effectiveness of treatment applied, even if my treatment was not addressing the treatment goals or original problem, just because it was measured does not make it accurate or true.

Based on the lack of objective, peer reviewed, measures utilised in the social impact study, I object to this project, what I would recommend:

- A serious review into the social measures applied by WSP and any evidence to demonstrate the level of application of such measures to achieve statistical significance in the population it is attempting to measure.
- Seriously questioning EnergyCo about why such measures were allowed to be used and why EnergyCo were accepting the outcomes from WSP of such measures as true and accurate for the impacts of its project.
- Once appropriate measures are identified that this study must be recompleted in such a way that is statistically meaningful and that a new report is developed with considerations and actions included in the EIS for this project.

I would appreciate the opportunity to discuss these concerns in more detail and explore possible solutions. At this point in time, the impacts of this project appear to be very serious and this project should not be approved until the impacts can be investigated and addressed. Please let me know when it would be convenient for us to meet and discuss these matters further. Thank you for your attention to this important matter.

With deep concern,  
Rebecca Glencross