

16th September 2023

**Voice for Walcha Submission to Community Engagement Review led by Andrew Dyer,
Australian Energy Infrastructure Commissioner (AEICO)**

Background

Voice for Walcha is a community volunteer group. The group was formed when it became obvious the bulk of the Walcha Community were unaware of the size of the Winterbourne Wind Farm (Now owned by Vestas) or the impact this project was going to have on our town. "Community consultation" was limited to closed discussions with landholder hosts and affected neighbours. The Community Consultative Committee that was (compulsorily) set up was a farce and established purely to tick the developer's community consultation box. Community members of this group were reprimanded for disseminating information provided at the meetings to the community. We felt there was a need for a group to be set up to inform the community of what a project of this size would mean for Walcha. The developers were certainly not going to take on this role, and were actively acting against this objective.

This submission from Voice for Walcha is based on our experience with the developers of Winterbourne Wind, Walcha Energy and Vestas, as well as our interaction with EnergyCo around the roll-out of transmission infrastructure. Our experience regarding community consultation has not been a positive one. There is an understanding that the community has been totally left out of any planning conversation. There has been a lack of transparency and a failure of these developers to answer direct questions. This has resulted in poor community acceptance of the proposed projects as well as a deep distrust of renewable energy project developers, including EnergyCo.

Voice for Walcha are a non-funded voluntary group. The group consists of a mixture of people. Some live on rural properties and some in town. Some of our members are from families who have been in the area for generations, and some have chosen to move to this area more recently. Our members are farmers, artists, lawyers, vets, IT specialists, authors and engineers. Our commonality is our love and concern for Walcha and the community. That is where this submission comes from.

This submission is based on the Community Engagement Review: Discussion Paper, and centres around the poor community consultation process that has resulted in poor community acceptance and lack of social license for the projects in our area. We make suggestions as to how this can be improved.

1. Good Transparent Planning

There is a justified anger in the New England REZ community that the generation projects and transmission infrastructure are being rolled out without a strategic plan. If there is a plan, the community has not been involved in the conversation and this plan is still not being conveyed to them. This is despite multiple attempts to obtain this information. It would appear there was little actual strategic planning other than engineering the AEMO optimisation plan called Integrated System Plan 2018 -2020. (ISP). The NSW Government, despite the AEMO technical lead, pursued with nothing other than an ANU resource assessment and there was little to no dialogue with rural communities particularly those nominated as REZs.

It is stated in the Community Engagement Review Discussion Paper – "However, it is not just about meeting commitments and targets – it is also a race against time to ensure we have security of supply in place well ahead of the announced closure dates for significant coal-fired assets."

That is how it feels to the community – a panic and rush to get projects and transmission infrastructure built with a lack of proper planning. A political exuberance by the then Government to try and better position themselves ahead of the threat of the political growth of the Teals.

Show the communities a good, complete plan and there will be a much higher level of acceptance. This plan would also allow properties hosting generation projects to be prioritised for transmission easements which may alleviate some of the anxiety created in the broader community.

In our instance, we are being shown a map from EnergyCo with transmission lines on it coming across prime agricultural land over the Walcha Plateau. What are the generation projects that this infrastructure is servicing? Why is there a south hub when there are no projects in that area, and no interest in hosting them. Does this infrastructure have anything to do with the Queensland NSW Interconnector? What are the cumulative impacts of these projects? All questions that we have put to the EnergyCo consultants many times with no answers. To the community, it feels as if there is no plan, no community consultation when forming this plan and no community engagement in explaining the plan. If there is a plan, it is one that has been decided by conversations between generation developers and EnergyCo. This is not in the interests of the community.

To achieve acceptance of projects, communities need to be involved from the very early stages of the planning process.

In the Walcha area, we have an inexperienced developer who is flipping projects in a frenzy to acquire project space, with little likelihood of project success. They are communicating these proposed projects to EnergyCo who are planning transmission easements with a seemingly aimless purpose (if the projects are unlikely to reach development stage). This is an example of poor planning with no community engagement at all. This could be alleviated with early community engagement which identifies a lack of appetite for hosting wind turbine projects, and negates the need to create unnecessary easements.

Communities need to feel that impacts of projects and transmission infrastructure are being considered early and as a priority, not as something that will be considered post-planning. The Planning Regime has been in existence since 1979 -it has morphed into a development process regime -a tick the box pathway to consent. In Walcha's example, we have the Oxley Hwy as the only access to our major regional centre (including the regional hospital). This is a uniquely winding, narrow road in steep terrain, with very few passing opportunities. The road is totally unsuitable for heavy vehicles of any quantity, as required for wind farm construction. The proposed wind projects in the Walcha LGA are planning to use the Oxley Hwy as access for construction of the projects. If this goes ahead, every business and existing industry in the LGA will be severely impacted, as well as the community at large. The project developers say it is up to EnergyCo to resolve this issue. EnergyCo will not commission a study, in the short term, on the impacts of the use of the Oxley Hwy. This builds on the resentment and frustration of the community and the lack of acceptance of all projects.

Impacts to the community should be addressed early in the planning process, not left until after project approval. Clearly the opaqueness of the scoping phase needs to be open to community participation – consistent with the planning principles – there should be a ‘public scoping phase’ immediately before site selection is finalised.

2. Early Consultation with Communities

Under the current planning process, the first time there is input from communities is their submissions to the EIS. This is after most of the planning by the developers is complete. We have always felt that this is totally the wrong way around. Consultation at the pre-scoping and scoping stages would be a lot more meaningful and beneficial to the community and project outcomes. Council and communities should be informed about projects from inception. Community feedback at scoping stage before the SEARs is issued would result in community concerns being addressed before the planning stages. Protection of prime agricultural land, environmentally sensitive areas, biodiversity, tourist attractions, important transport routes, and culturally significant areas can be achieved by early community consultation at the scoping stage. This process would also help project developers shape a project that is more likely to gain broad community support.

See Winterbourne Wind Case Study below for an example highlighting the importance of community input at the scoping stage.

3. Consultation with Community Groups, *not just Council*

Community interests and council interests are not necessarily aligned and consultation with council cannot be considered to be whole community consultation. Councils are concerned about their own financial

viability and how the council may benefit from generation and transmission projects. Communities are concerned about the impacts on local businesses and industries, lifestyle impacts, social impacts affecting the community, impacts on the environment, cultural impacts. While these may be of some concern to council, it is our experience that they are secondary to the outcomes councils are looking to achieve from the REZ developments.

Communications should be carried out with community groups and the broader community, not just the local council. Consideration should be given to reinstating Community Consultation Committees which a sharper focus away from just tick the box. Real community scrutiny.

4. Regulation of Generation Project Developers

I am using our experience of developers to highlight this point. Project flippers have come into the Walcha region and for minimal financial outlay have signed exclusivity agreements with landholders. This developer has no intention of seeing these projects to the construction stage. They are not concerned about the long-term viability of the project, and they are certainly not concerned about the impact on the community or the existing businesses in the region. They are interested in making a quick profit and moving onto the next project.

In the case of Winterbourne Wind, one developer owned the project through to the SEARs being issued. Another developer bought the project with the intention of submitting the EIS and selling the project at financial close. An incomplete, erroneous and misleading EIS was submitted and accepted by the planning department. This project has serious environmental, financial and social implications for the Walcha community. However, the designers of this project are not concerned about this because they will not be building or operating this wind farm. Unsurprisingly, this has led to widespread anxiety and frustration in the community. It has damaged the reputation of all renewable energy project developers and created a community that is hostile to renewable energy projects. Developers could be required to make a substantial financial contribution to the local council which would enable the council to commission reports into the impacts of the project. Currently the Walcha council does not have the resources to fund these studies that are vital for informed decision making. They are unable to properly assess the impact on roads, water, gravel, housing, health etc. in a way that they would be expected to, in a way that is required by the community. The council needs to determine what the cost to the community will be, when negotiating access agreements for the project developer.

A financial contribution from the developer would serve to both act as a barrier to entry for non-genuine developers as well as a source of income for councils to commission necessary studies.

5. A Definition of Social License

We have been told that projects will not be approved if they do not have social license. How does a developer demonstrate a project has social license if there is no definition? How do communities get any comfort from this assurance if they do not know what it is?

Social License is a cornerstone of the REZ concept, yet there is no definition.

6. Ensure community consultation is meaningful, not token

The community consultation we have experienced by developers, is purely to fill in the community consultation table in the EIS. Offices in town that are not open, telephone information lines that are not answered, emails with delayed ambiguous responses. It is an insult to the community and a waste of their time. How do we change this to genuine consultation?

Community consultation driven by the developers is fundamentally flawed because it is not in the developer's interests to inform the community of the impacts of their projects.

Continued obfuscation and lack of respect for the community with this style of communication builds further resentment and mistrust. It creates a lack of confidence in the renewable industry and the developers within it.

The existence of an ombudsman or other independent body may be helpful. This would make developers accountable in the engagement process and may give community members more confidence when seeking reasonable answers from developers.

EnergyCo – A Case Study

EnergyCo's development of a transmission infrastructure "plan" is perhaps the best example of poor community consultation.

EnergyCo conducted a ROI (Registration of Interest) then EOI (Expression of Interest) process to identify and select generator and storage projects to participate in the REZ. There was no community consultation at this stage.

In May, the community started to hear rumours from council and "people in the know" that EnergyCo were about to release the transmission line easements map for the New England REZ. There were rumours about whose properties this was going to pass through based on people's memories of a map they had been shown with minimal detail. Imagine the anxiety this creates in a community.

At the end of May or early June, some landholders received envelopes pinned to their front gates informing them the transmission lines would be running through their property. This is the first they heard about it. A map was released with the proposed easements marked. For some landholders, this is the first time they realized transmission infrastructure would be passing through their property. We were told EnergyCo would be visiting for "community consultation". In these "consultation" sessions, the community was informed that there may be small tweaks and changes but essentially, this is where the transmission infrastructure would run.

Where is the community consultation?

From our perspective, the only consultation was between developers and EnergyCo – 2 parties interested in getting new generation and transmission projects rolled out as quickly as possible. Consideration was only given to the location of wind and solar resources and developer feedback. No consideration was given to how developers would gain access to these sites and the impact this may have on communities. Who was looking after the community's interests in these discussions?

When we question EnergyCo about the projects that were considered in the Expression of Interest process that justified the infrastructure crossing the Walcha LGA, there was no answer. There is still no answer after repeated requests.

The result of this is a confused, frustrated, anxious and very suspicious community. A community that is questioning the competence of EnergyCo and questioning the entire REZ concept.

How can this be improved? As highlighted by the Government commissioned Jacobs Health-check report. Energy Co's governance and its technical skill base is left wanting.

Include community groups in the early stages of planning. Communities are only finding out about these projects when the planning is complete. This means communities are not being consulted.

Make the process transparent with explanation of why the easements are running where they are, including the generation projects that are being considered. Make all information available to communities.

Seek community feedback. This could involve getting a register of interested community groups and people. This has to be proactive from EnergyCo. Community groups are generally volunteer groups with busy lives and no experience in the planning industry, and we need to be informed of this process. Community groups are not aware of the opportunities that are available to make submissions and contribute to the planning process.

There is an appearance in the community that information is available to developers but is bypassing communities. Opportunities come and go without community awareness, and this builds resentment, and resistance. A perfect example of this is this Community Engagement Review itself. We are communicating with EnergyCo, directly with Mike Young and various other employees and consultants. We subscribe to updates from EnergyCo. We are a visible community group. Despite this, we were not informed about the opportunity to make a submission to this Community Engagement Review, until a friend passed on the information.

There needs to be more effort by EnergyCo and government Departments to inform the community, and to make us aware of opportunities for feedback and participation. Developers are cognisant of this process, where as community members are not, and are therefore being left out of the process and conversation.

Winterbourne Wind Farm – A Case Study

Winterbourne Wind Farm, in the Walcha region, is an example of community opposition manifesting as a result of poor project selection and development execution. Would community consultation and input at the scoping stage have resulted in a project that reflected community tolerance? It may have in fact resulted in a poor project failing to reach planning stages due to its inappropriate location and size. Either way, it would have saved a lot of community anxiety, and ultimately suspicion of and resistance to all renewable energy projects.

The community were unaware of most of the details of the Winterbourne Wind Farm until the EIS was exhibited by the planning department, 2 years after the scoping report was submitted. It wasn't until November 2022, that the community realized they were looking at a 700MW project, adjacent to the World Heritage National Park, with all construction coming through the town. The volume of resources required, and the sheer scope of the project only started dawning on the community at this stage. The social, economic, and environmental impacts were becoming evident. How did it get to this point without community awareness or scrutiny?

This was compounded by a failure of the planning process. The planning department were presented with an incomplete, inaccurate, and misleading EIS. Studies were not complete, impacts were understated, traffic numbers were inconsistent, non-existent neighbour benefits were included, environmental baselines were inaccurate, noise studies were fundamentally flawed, incorrect native title groups were consulted... the list goes on. Why did the planning department allow this EIS to be exhibited? How does a community have faith in the planning process when an EIS as lacking as the Winterbourne Wind Farm is allowed to be exhibited? How do you gain social license when the community has no confidence in the developer or the planning system?

Community involvement and consultation at the pre-scoping and scoping stages would help shape projects that are appropriate in size and location and lead to better community outcomes.

We need a planning process that throws out poor projects at the scoping stage and concentrates all resources on well planned projects with community input and support.

We thank you for this opportunity to make a submission and look forward to improved community consultation in the future.

Voice for Walcha