Submission No 257

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

Name: Name suppressed

Date Received: 27 October 2025

Parkes Resident
27 October 2025

The Secretary
NSW Department of Planning, Housing and Infrastructure
GPO Box 39
Sydney NSW 2001

Re: Objection – Proposed Energy-from-Waste Facility at Parkes, NSW

Dear Secretary,

I write to express strong concern regarding the proposed Energy-from-Waste (EfW) facility within the Parkes Special Activation Precinct. Based on a risk-based approach and local context, there are significant potential adverse health, environmental, agricultural, and social impacts that warrant refusal or, at minimum, an independent inquiry under the precautionary principle.

1. Potential failure modes and health risks

Thermal waste-to-energy facilities carry credible failure modes, including incomplete combustion, emissions bypass during startup/shutdown, and malfunction of air pollution control systems. Such events can lead to uncontrolled releases of fine particulate matter ($PM_{2.5}$), nitrogen oxides, dioxins, furans, and heavy metals — all linked to respiratory, cardiovascular, and carcinogenic health risks. Even minor control failures can produce short-term exceedances above public health criteria, particularly under the prevailing westerly winds that would carry emissions toward residential areas, schools, and the Parkes Health Service.

2. Local community opposition and cumulative burden

There is strong and growing local opposition to the project due to concerns over health impacts, odour, truck traffic, and its incompatibility with the region's vision as a clean, innovative agricultural and space-technology hub. Proceeding despite sustained community objection would undermine social licence and contradict the NSW Government's stated principles of transparency and regional consultation.

3. Consultation and governance concerns regarding the Parkes Special Activation Precinct (SAP) establishment

The sequence and substance of consultation for the Parkes SAP raise serious questions about whether local residents, landholders and stakeholders were properly engaged at the outset. Key concerns include the following:

- The precinct was publicly announced by the NSW Government in July 2018 as the first official SAP in NSW.

- A draft Master Plan for the Parkes SAP was placed on public exhibition from 20 September until 20 October 2019 (a five-week window) according to the Planning Portal.

- Despite the brevity of the consultation window and the scale of change implied (4,800 ha plus multiple sub-precincts), the publicly-listed number of submissions on the Master Plan was only **34**.

- The drafting of the Master Plan followed *"12 months of detailed investigation"* per a Council media release (September 2019), but there is no clear evidence that large-scale community workshops, targeted farming-landholder briefings, Aboriginal heritage site consultations (please also refer to Section 3 of this letter) or agricultural-sector forums were held prior to or during that investigation phase.

- The Master Plan documentation was developed on a largely state-government led basis (via Regional Growth NSW Development Corporation and Infrastructure NSW) and emphasises investor attraction, infrastructure investment and streamlined approvals.

- While the Master Plan and subsequent Delivery Plan contain community and social infrastructure assessments, those documents appear to focus more on servicing industrial land uses rather than proactive, inclusive engagement of existing rural neighbours and agricultural enterprises.

- The fact that the SAP's vision includes "resource recovery and recycling" and clearly identifies a recycling/EfW facility within the structure plan raises a serious concern: many local landholders and residents report they became aware of the EfW component only after the state announced the consortium in **2025**, rather than during the foundational precinct planning or the 2019 exhibition.

- In effect, this suggests that key land-use changes with potentially high community impact were embedded without robust early stakeholder consultation, particularly for farming and rural dwelling neighbours, and Aboriginal heritage custodians.

- The perception that such foundational consultation was limited or tokenistic undermines trust and contributes to the strong local opposition now observed. It raises a governance risk for the Department: if the community views consultation as deficient, subsequent processes (EIS, AQIA/HHRA, community consultation) will face credibility deficits.

- Given these issues, the Department should require a **comprehensive, independent retrospective consultation audit** to verify the adequacy of stakeholder engagement for the SAP's establishment phase, and mandate renewed, targeted community engagement (especially with agriculture, heritage and residential stakeholders) before any EfW project within the precinct is consented.

4. Aboriginal heritage and cultural impacts

The proposed site lies within or near areas of Aboriginal cultural significance, with a high likelihood of artefacts and heritage landscapes being disturbed. Insufficient consultation with Traditional Owners would risk non-compliance with the Aboriginal Cultural Heritage Act 2023 (NSW). Any approval should be contingent on a comprehensive Aboriginal Cultural Heritage Assessment Report (ACHAR) and continuing oversight by local Custodians.

- The foundational documentation for the proposed facility does not appear to demonstrate that Traditional Owners and Aboriginal custodians in the Parkes region were engaged early and meaningfully in the development of the SAP or the specific EfW facility.

- Given that the SAP's Master Plan process did not highlight detailed Aboriginal cultural heritage engagement in publicly accessible submissions or modelling of impacts on known heritage sites, there is a substantial governance risk that heritage obligations have not been satisfied.

- The fact that many local Aboriginal stakeholders report they were unaware of the EfW component until after the project announcement reinforces this concern.

- Given the statutory duty under the NPW Act (and similar obligations under the forthcoming legislation) to consult Aboriginal people as a primary determinant of the significance of Aboriginal heritage, any deficiency in that process could undermine the legitimacy of approvals or trigger reconsideration.

- Therefore, I recommend that as part of any consenting process (which as noted are strongly opposed) the Department require:

    - A full Aboriginal Cultural Heritage Assessment Report (ACHAR) carried out in collaboration with registered Aboriginal parties and custodians;

    - Evidence of *preliminary* consultation results demonstrating the identification of Aboriginal objects/places, potential impacts, and agreed management/salvage strategies;

    - A heritage-management plan overseen by the Aboriginal custodians with clear rights to monitor, audit and intervene in breach scenarios;

    - A "stop-work" or "trigger event" mechanism if cultural heritage is found during construction, with immediate reporting to Aboriginal heritage services and the Department.

5. Visual amenity and tourism

The proposed 60-metre emission stack and industrial infrastructure would be visible across large parts of the Parkes township, adjacent rural properties, and along the Newell Highway. The structure would detract from the rural character of the district and conflict with the Parkes Shire Council's tourism strategy focused on rural landscapes, the Dish, and the Special Activation Precinct's innovation precinct identity.

6. Impact on prime farmland and agricultural production

The proposed EfW facility is situated adjacent to areas of Class 2 and Class 3 agricultural land, which support cropping and livestock production integral to the Parkes regional economy. Potential risks to farmland include:

- Deposition of heavy metals, dioxins, and fine particulates onto pasture, crops, and surface water during normal operation or upset conditions;
- Bioaccumulation in livestock and contamination of feed or produce, potentially affecting market access and consumer confidence;
- Dust, odour, and increased heavy vehicle traffic disrupting farm operations and animal welfare;
- Loss of productive land through land-use conversion and buffer zone restrictions.

These impacts are contrary to the NSW Right to Farm Policy and State Environmental Planning Policy (Primary Production and Rural Development), which require preservation of prime farmland and protection of agricultural viability. Any degradation of soil or pasture quality from airborne contaminants would have irreversible consequences for local producers.

7. Elevated cancer burden in Parkes & surrounds, and constrained access to care

Available public data clearly indicate that regional and remote NSW, including Parkes LGA within Western NSW Local Health District (WNSWLHD) experiences higher cancer mortality and poorer survival than metropolitan NSW, driven by later diagnosis, lower screening participation in some cancers, and limited access to specialist services:

- Rural cancer outcomes are worse overall. Across Australia, people in rural and remote areas have higher cancer mortality and poorer survival than those in major cities, reflecting later presentation and treatment access barriers.

- Western NSW service footprint is centralised. WNSWLHD's principal cancer centres are in Bathurst, Dubbo and Orange, with only limited outpatient consults/treatments at Parkes Health Service. This model requires many Parkes residents to travel long distances for diagnostics, chemotherapy/radiation, and multidisciplinary care—factors associated with delayed treatment and worse outcomes.

- State cancer data confirm this regional disparity. The Cancer Institute NSW's official dashboards (Cancer Statistics NSW) show higher mortality rates in several regional LHDs compared with NSW averages for key cancers in recent years; these dashboards are the authoritative source for incidence, mortality and survival by geography.

- Travel and specialist shortages compound risk. Rural Australians face longer waits for specialists and must travel further for diagnostics and treatment, which contributes to later-stage diagnosis and avoidable mortality.

Implication for the EfW proposal:

Introducing a large thermal EfW facility adjacent to a community that already experiences elevated cancer risk factors, worse survival, and constrained access to oncology services is contrary to health-equity principles.

Even small incremental increases in $PM_{2.5}$, NO_2, metals and dioxin/furan deposition—especially under plant upset or failure modes may disproportionately impact Parkes residents given baseline vulnerabilities and the need to travel for specialist care. In a setting where timely diagnosis and treatment are already challenging, any added environmental carcinogenic burden is unacceptable and inconsistent with NSW's obligation to reduce health inequities.

Accordingly, I request that the Department consider:

- Applying the precautionary principle given the region's existing cancer burden and access constraints;

- Require that the proponent's HHRA explicitly model sensitive receptors in Parkes and quantify incremental cancer risk (including deposition-to-diet pathways) relative to NSW benchmarks; and

- Demonstrate how any approval would be contingent on independent ambient monitoring in Parkes, transparent reporting, and access-to-care mitigation (e.g., funded patient travel and regional oncology outreach) should exceedances or health triggers arise.

8. Legal and regulatory risks

Under the Protection of the Environment Operations Act 1997 and POEO (General) Regulation 2022, EfW facilities are tightly restricted to designated precincts and must meet strict environmental performance standards. Failure to demonstrate best-available technology, health protection, and cumulative impact control could render any approval legally vulnerable. Omissions regarding community consultation, Aboriginal heritage, or farmland impact may be grounds for judicial review.

9. Precedent of political opposition and perceived political bias

There is a well-documented precedent of political opposition to energy-from-waste and waste-to-energy plants across Australia, particularly where such facilities have been proposed close to residential and agricultural communities. In several cases, strong community objections have been echoed by local Members of Parliament, leading to government intervention or cancellation of projects.

• ***Ella George (State Member for Lara, Victoria) stated***: “It’s incredibly important to the community that I represent. The Lara community has some very reasonable concerns about this project, and these are concerns that I share.” She later added: “Lara is not the dumping ground for Melbourne’s waste. I have not spoken to a single local resident who supports this or thinks a big incinerator is a good idea for the Lara community.”

• ***Alison Marchant (Member for Bellarine, Victoria) similarly stated***: “Concerns include the facility’s proximity to residential areas and potential health and environmental impacts.”

• ***Chris Bowen (Federal MP for McMahon, NSW) said of a similar proposal****:*
“Western Sydney is not a dumping ground, and we will not be treated like second-class citizens.”

These examples show that when such projects arise in Labor-held electorates, there is often strong political advocacy for the community. In contrast, the Parkes region, as a non-Labor seat, has not seen comparable representation despite equivalent concerns. Many residents perceive this disparity as political bias in infrastructure siting. This perception undermines trust in the planning process and highlights the need for impartiality and fairness in decision-making for regional communities like Parkes.

10. Conclusion

The proposed Parkes EfW plant poses unacceptable risks to community health, prime agricultural land, Aboriginal heritage, and the visual and environmental character of the region. The scale of opposition and the credible failure modes associated with such facilities highlight the absence of social licence.

I therefore urge the Department to refuse consent or, at a minimum, require a full independent inquiry into the health, agricultural, and cultural risks before any further consideration.

I respectfully request that my name and personal details be withheld from publication on the public submissions list. This submission is made in good faith in the public interest and without malice.

Yours faithfully,
Parkes Resident