Submission No 409

INQUIRY INTO PROPOSED ENERGY FROM WASTE FACILITIES

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Date Received: 31 October 2025

Submission to the NSW Parliamentary Inquiry into Waste-to-Energy Infrastructure

Submitted by: Alexandra Power

Date: 31 October 2025

Location: Parkes Shire Region, NSW

1. Introduction

I appreciate the opportunity to make a submission to the NSW Parliamentary Inquiry into Waste-to-Energy (WtE) Infrastructure. I provide this submission both as a qualified professional in transport and infrastructure planning and as a resident and community member of the Parkes region.

The Parkes Waste-to-Energy proposal represents one of the most significant industrial developments within the Parkes Special Activation Precinct (SAP), established under the State Environmental Planning Policy (Activation Precincts) 2020 (SAP SEPP). The SAP was developed following extensive public and agency consultation between 2018 and 2020, culminating in the gazettal of the SAP SEPP in July 2020 and the release of the final Parkes SAP Master Plan in August 2020.

The SAP was designed to attract clean industry, logistics, and innovation-led enterprises aligned with the Central West and Orana Renewable Energy Zone. The proposed WtE facility, by contrast, introduces significant environmental, transport, and planning risks that require comprehensive and transparent assessment.

2. Planning and Land Use Compatibility

The Parkes SAP Master Plan and the Activation Precincts SEPP (2020) were designed to facilitate sustainable industrial growth compatible with circular-economy principles and the Central West and Orana Renewable Energy Zone (REZ). Introducing a large-scale Waste-to-Energy facility directly conflicts with this policy framework.

The proposal introduces continuous stack emissions, odour, and heavy-vehicle traffic within proximity to existing logistics, warehousing, and agribusiness precincts. This land use incompatibility is inconsistent with the SAP's planning intent and the community feedback received during its public exhibition in 2019, which emphasised support for clean, renewable industries rather than combustion-based waste processing.

3. New or Undefined Technology Concerns

The proponent has described the Parkes facility as employing “new” or “next-generation” technology without clearly defining the process configuration or demonstrating compliance with international best practice. There is no verified testing data, peer-reviewed performance evidence, or certification confirming compliance with NSW EPA emission limits or EU Industrial Emissions Directive standards. Until the technology type and

emissions performance are independently verified, the project should be treated under the precautionary principle and assessed as conventional high-risk thermal treatment.

4. Transport and Logistics Impacts

The facility will generate substantial freight movements by both road and rail. Road access will rely on the Sturt and Newell Highways and local SAP roads already under pressure from concurrent regional infrastructure projects. A comprehensive regional transport and freight assessment must be undertaken in coordination with Transport for NSW.
The proponent must also conduct a Rail Corridor Impact Assessment (RCIA) with ARTC, addressing freight capacity, safety at level crossings, odour containment, and noise impacts along the full haulage route.

5. Environmental and Health Risks

The EIS must quantify the project's negative externalities, including air quality, noise, odour, and greenhouse gas impacts. These costs must form part of any project consideration to determine whether the benefits outweigh the costs to human life, health, and the environment.
Comprehensive base case testing is also required to establish baseline environmental, health, and traffic conditions across all potentially affected LGAs. The EIS should assess cumulative impacts and establish a regional baseline for comparison. Additionally, the assessment must evaluate potential loss or degradation of productive agricultural land in accordance with NSW Agricultural Land Mapping and Classification Guidelines (2023).

5.1 Emergency Management and Hazard Impacts

The project must include a full Emergency Management and Hazard Analysis addressing risks from fire, explosion, hazardous-material release, transport incidents, and natural hazards. Plans must be developed in coordination with Fire and Rescue NSW, SafeWork NSW, NSW Health, and the NSW Rural Fire Service, ensuring community safety and emergency response capacity.

6. Current Waste Management Framework and Need for Reform

Waste management in NSW remains fragmented, with councils, private operators, and multiple agencies managing different components without a unified strategy. This fragmentation has led to inconsistent outcomes, limited transparency, and ad hoc infrastructure decisions. A dedicated NSW Waste Authority should be established to oversee planning, compliance, and performance monitoring. The authority should have a compliance branch funded through levies on Waste-to-Energy projects.

7. Compatible Land Uses – Evidence from Comparable Projects

International and Australian case studies (Kwinana, East Rockingham, Edmonton EcoPark, Poolbeg, and Tuas) demonstrate that Waste-to-Energy facilities are only compatible with heavy-industrial or port precincts featuring significant buffers and freight access. Clean-industry precincts such as the Parkes SAP are not compatible land uses for such facilities.

8. Assessment Governance and Planning System Reform Context

Given recent planning system reforms, it is essential to clarify how DPHI, as the Declared Consent Authority, will maintain rigorous technical assessment processes and ensure EPA experts continue to provide input. The Inquiry should request clarity on the assessment pathway and confirm that planning reform will not dilute environmental or technical scrutiny.

9. Assessment Pathway within the Parkes Special Activation Precinct

As the project is located within the Parkes SAP, DPHI is the consent authority under the SAP SEPP. It is anticipated that the development will be declared State Significant Development. The Inquiry should seek confirmation of the assessment pathway and guarantees that no fast-tracked or reduced consultation processes will apply. Full public exhibition, inter-agency review, and independent EPA concurrence must be mandatory.

10. Recommendations

1. Suspend consideration of the Parkes WtE project until a regional infrastructure and network assessment is completed.
2. Require alignment with the NSW Energy from Waste Policy (2021) and restrict feedstock to proximate non-recyclable waste.
3. Commission a cumulative traffic, rail, and freight impact study in consultation with TfNSW and ARTC.
4. Mandate quantification of all negative externalities and a full cost-benefit analysis consistent with NSW Treasury guidelines.
5. Undertake base case testing and Agricultural Land Impact Assessment across all affected LGAs.
6. Establish a NSW Waste Authority with compliance functions funded by WtE levies.
7. Require a Rail Corridor Impact Assessment and a Comprehensive Emergency Management Plan.
8. Confirm SSD classification within the SAP and guarantee full community consultation.
9. Ensure EPA and DPI Agriculture technical concurrence before determination.

11. Conclusion

The Parkes Waste-to-Energy project, while intended to reduce landfill dependency, presents significant planning, environmental, and social risks inconsistent with the intent of the Parkes SAP. A transparent, rigorous assessment process — incorporating EPA oversight, agricultural and transport analysis, and full public consultation — is essential to determine whether the project aligns with the public interest and the principles of sustainable development.