

SUBMISSION TO THE NSW TRANSMISSION PLANNING REVIEW – INTERIM REPORT

Social Dimensions in Transmission Planning – Values, Place and Social Licence

25 July 2025

Dear Review Team,

We welcome the opportunity to respond to the NSW Transmission Planning Review's Interim Report, particularly on the treatment of the social dimensions of transmission planning—namely, values, place, and social licence. These elements are crucial to the success of the energy transition and should be recognised not only as practical delivery risks but also as core planning principles.

This submission responds specifically to the Interim Report's treatment of community engagement, public interest alignment, and social licence and is also informed by the content and framing presented in the Consultation and Options Papers.¹

Commendable Recognition of Social Dimensions

The Review rightly elevates social considerations to a level commensurate with economic and technical factors. The Options Paper states:

“Local communities and consumers should be treated as trusted partners that are consulted on the inevitable trade-offs involved in planning large transmission projects” (Options Paper, p. 2).

We strongly support this approach and commend the review for:

- Embedding "public interest alignment" and "improved outcomes for NSW electricity consumers and local communities" as core assessment criteria.
- Identifying the need to “implement best-practice engagement obligations” and proposing options for a Consumer [and Community] Panel (Options Paper, Section 4.6).

These are meaningful responses to longstanding community concerns around trust, transparency, and the distribution of benefits and burdens. The interim report's proposal for a Consumer Panel, for example, recognises that the social and economic implications of transmission projects reach beyond communities within the direct vicinity of proposed or existing transmission lines to encompass electricity consumers across the state. The decision not to propose a combined Consumer and Community Panel seems reasonable given the diverse needs and concerns of communities across the state. However, we note that this underscores the importance of adequate support for and involvement of existing community groups such as the REZ-specific Community Reference Groups. In addition, there remains a broader need for forums that can enable

¹ We recognise that there are several other important dimensions of transmission that are not discussed in detail in this submission, including engagement with Aboriginal and Torres Strait Islander people and benefit-sharing, but we understand other submissions will cover these dimensions in greater depth.

constructive dialogue between consumer and community representatives about how to achieve an approach to transmission that is equitable for rural and regional communities and (mostly but not exclusively urban) consumers alike, particularly in light of efforts in some quarters to invoke rural-urban divides for strategic or rhetorical purposes in order to undermine progress on the energy transition (Colvin et al. 2024) [See [Recommendation 1](#) below]. This could take place, for example, through dialogue between the proposed Consumer Panel and established Community Reference Groups and other regional representative bodies.

We are also encouraged to see that the report recommends stronger legislative requirements for community engagement and consumer engagement on transmission projects in the EII Act (recommendation C.1, p.114). These should be consistent with, or where appropriate exceed, related requirements in the NER and the RIT-T process.² Community engagement expectations could also be integrated into merit criteria for transmission assessments as Critical State Significant Infrastructure (CSSI), similarly to VicGrid [see [Recommendation 2](#) below].

Dedicated stakeholder engagement plans (recommendation A.6) would also help EnergyCo to coordinate placed-based engagement where transmission, generation and storage projects are being proposed or constructed concurrently.

Critical Gaps and Areas for Strengthening

Despite these strengths, we suggest that the Review does not yet go far enough in several respects. At an overarching level, it could go further in operationalising social licence as a structural—not just procedural—dimension of transmission planning. We also highlight two specific areas of coordination and regulatory alignment that the final report could address further: cost allocation and land use access.

a. Social Licence Is Still Treated Procedurally Rather than Structurally

The Options Paper focuses on consultation mechanisms (e.g., Option E.1–E.7), but the Interim Report does not yet link community engagement outcomes sufficiently to project prioritisation or design choices. There remains a risk that engagement will be perceived as a formality rather than a substantive input that can meaningfully shape decision-making. The Options paper noted: “[T]he importance of this consultation is not recognised in the current NSW regulatory framework and the effectiveness of consultation varies in practice.” (Options Paper, p. 2). This diagnosis is in our view accurate and is reinforced by the Interim Report’s recommendations on amendments to the EII Act as well as in stakeholder feedback summarised on p.107. Notably, one stakeholder commented that: “Engagement by Roadmap bodies is at the ‘inform’ end of the IAP2 public participation spectrum, rather than more meaningful ‘consult’, ‘involve’ or ‘collaborate’ engagement.” Avenues for engaging with transmission planning (both to provide positive and critical input) remain opaque and siloed.

The proposed remedies (e.g. the Consumer Panel, increased transparency, strengthening regulatory requirements and coordination arrangements for community engagement, and increased resourcing of EnergyCo’s engagement function), while important, do not yet guarantee that local voices will meaningfully shape planning outcomes. Unless concerns of social licence, equity and community engagement are addressed comprehensively and backed up by adequate resourcing, there is a risk

² National Electricity Amendment (Enhancing community engagement in transmission building) Rule 2023 No. 5.

that NSW could see community opposition to proposed transmission lines increase further, recalling Victoria's experience in 2023 with pushback from affected groups.

Meaningful community engagement and social licence could be strengthened through a range of measures [see also [Recommendations 3 and 4](#) below] that complement EWON's new 'no wrong door' mandate, but we briefly highlight three here:

- 'One stop shop' style shopfronts (whether in the form of Local Energy Hubs or related formats) that make it easier for people to engage on transmission and other energy-related issues at times that suit them (Community Power Agency, 2024). These should be designed not merely to distribute information but to enable people to discuss issues of concern and meaningfully inform decision-making.
- Resourcing for participatory initiatives that empower regional communities and First Nations organisations to deliberate on and articulate their priorities and concerns in relation to transmission. This could draw on recent experiences with participatory planning in Hay in the South-West REZ (RE-Alliance, 2025) and the Real Deal methodology used in the Hunter and other industrial regions in Australia (Tattersall et al. 2025).³
- Introduce a requirement for mandatory regional-level strategic Social Impact Assessments (SIAs) for transmission corridors in line with the updated NSW SIA Guidelines with applicability to both State Significant Infrastructure (SSI) or Critical State Significant Infrastructure. Currently, it is unclear whether the NSW SIA Guideline applies to CCSI. A strategic SIA for Transmission Corridors may support greater mapping of social impacts and benefits as a foundation for further measures to build and maintain social licence. High-quality SIAs are investments in the infrastructure of the transition, not a 'cost'.

b. Absence of Clear Steps to Resolve Coordination Issues Associated with Different Cost Allocation Arrangements

The Options Paper notes that the Justice and Equity Centre "urged us to consider the impact the current inequitable Roadmap cost recovery arrangements have on social licence for the transition" (Options Paper, p. 11). While we recognise that pricing arrangements are out of scope, the absence of any formal pathway for escalating equity concerns into political or planning processes risks undermining the very social licence the Review seeks to reinforce. As the Interim Report notes, the difference in cost recovery arrangements under the NER and the EII Act, coupled with the current choice of regime, is also a coordination issue in that "creates a risk of confusion, inconsistency, duplication of work, forum shopping and inefficient outcomes" (p.35). In this regard, we note that the NSW Government accepted the following recommendation from the 2023 Electricity Supply and Reliability Checkup:

15. The exemptions framework for Roadmap costs should be reviewed and also consideration given to including transmission-connected businesses to reduce the burden on small customers.

An April 2025 update on implementation of the Checkup's recommendations flagged this item as being "in progress", without further details given. Considering the coordination and social licence

³ Two authors of this submission (Pickering and Taylor) are Chief Investigators on a new Australian Research Council-funded project on electricity transmission whose research methods will integrate engagement with communities in areas of transmission projects in NSW and Victoria.

concerns associated with this issue, the review could highlight the need for accelerated progress towards completing implementation of this recommendation [see [Recommendation 5](#) below].

c. Need to Strengthen Regulatory Standards for Land Use Access

A Transmission Land Access Code of Practice, as is required in Victoria (SEC, 2024), may present another avenue to build trust and transparency for transmission development when accessing, or seeking to access, private land [see [Recommendation 6](#) below]. While Transgrid has created a Land Access Code of Conduct, it represents non-binding commitments without detail concerning risk mitigation and dispute resolution. A similar Transmission Land Access Code to Victoria could be produced in NSW in close collaboration with local communities and landholders to improve engagement. Critically, a Transmission Land Access Code would address risk minimisation during land access, including the development and implementation of biosecurity practices. This is a particularly complex issue in NSW REZs overlapping RU1 (Primary Production) land.

Balancing the Role of Planning and Politics

We also acknowledge a legitimate counterpoint: some social concerns—such as equity of cost recovery or the prioritisation of regional impacts—are political in nature and may be better resolved through broader democratic processes rather than embedded directly into planning frameworks.

The Review must therefore walk a careful line. Embedding too many socio-political decisions within planning institutions risks overreach and inefficiency. However, entirely externalising them to the political domain underestimates their real-world effect on delivery risk and trust.

We support the Review's principle that:

“Planning must also look beyond traditional large transmission projects to consider the potential for alternatives including distribution and non-network options”
(Interim Report, p. 4),

and we encourage a parallel extension of that systems-thinking approach to social dimensions: these should not only be consulted on but recognised as core variables in the planning system itself [see [Recommendation 8](#) below].

The proposed NSW System Plan offers an opportunity to embed these broader considerations into planning processes. Meaningful community engagement on successive plans could offer a chance for broader community input on weighing up the merits of new transmission and other options, as well as on the scope of any proposals for new or amended REZs [see [Recommendation 9](#) below]. This may help to address a concern raised by stakeholders that the original process for identifying candidate REZs in NSW involved limited community input at an early stage (EnergyCo 2024, p.30).

Recommendations

To strengthen the treatment of social dimensions in the final report, we recommend:

1. **EnergyCo and/or NSW DCCEEW** should explore options to strengthen dialogue between electricity consumers and affected REZ and adjacent communities on issues of common concern relating to electricity transmission.
2. **Community engagement requirements should be integrated into the EII Act** and into merit criteria for transmission assessments as Critical State Significant Infrastructure (CSSI).

3. **Strengthen options for meaningful community engagement on transmission that goes beyond traditional information modalities**, including exploration of more proactive options such as local shopfronts and participatory planning initiatives.
4. **Introduce a requirement for mandatory regional-level strategic Social Impact Assessments (SIAs)** for transmission corridors in line with the updated NSW SIA Guidelines
5. **Accelerate progress on reviewing the exemptions framework for cost allocation for transmission projects under the EII Act.**
6. **Develop a binding Transmission Land Access Code of Practice** to build trust and transparency for transmission development when accessing, or seeking to access, private land.
7. **Expand the scope of best-practice engagement to include evaluation metrics and accountability mechanisms**, not just process obligations (e.g., require post-engagement reviews or feedback loops to communities).
8. **Strengthen interfaces between planning and political channels for unresolved equity issues on transmission** (e.g., through a standing reference group or ministerial forum where social equity concerns flagged in planning can be debated and resolved).
9. **Embed place-based planning explicitly in the NSW System Plan**, so that local values, Aboriginal perspectives, and community development objectives are integrated, not merely consulted on.

Conclusion

We support the Review's goal of improving the coordination, clarity, and effectiveness of transmission planning in NSW. The inclusion of social dimensions is a critical evolution. However, realising the full value of public engagement and community trust will require a stronger link between consultation and decision-making, and between planning and political accountability.

We thank the Review team for its considered work to date and look forward to contributing further as the process continues.

Regards,

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