

PROPOSED ENEABBA–MOONYOONOOKA 330KV TRANSMISSION LINE

RESPONSE TO MATTERS IN UNSOLICITED STAKEHOLDER LETTERS TO ERA

Issue: How can the government justify spending an additional \$25m ... by choosing a route that is approximately 25 km longer?

- A straight line, or shorter option would not necessarily be a less expensive option to construct or operate. It is unlikely that a straight line option would be pursued by any prospective applicant, given the need to take social, environmental, economic and technical considerations into account (for example the avoidance of houses, sensitive environmental features, industrial processing facilities and major infrastructure). Refer Appendix 3 for further details.
- Capital and operational costs are likely to be greater for transmission lines closer to the coast. Installation of corrosion resistant conductors and ongoing maintenance would be required for all of the corridor options assessed. In addition, Western Power and SKM's electrical consultant consider the corona effects will be more pronounced on transmission lines closer to the coast, which lead to loss of energy along the line. The capital costs and the operational costs of maintaining a transmission line are therefore considered likely to be greater near the coast.
- Community members repeatedly stated in workshops that the 'best' route should be selected, and this did not necessarily equate to the cheapest route. This was reflected in weightings given to the sustainability principles by workshop participants. For example, capital cost and operational/maintenance costs were given lower weightings than local industry or agriculture or impacts on land use. Of the environmental aspects, soil and land erosion were weighted higher than the capital or operational costs, habitat condition and vegetation communities aspects.

Issue: Why should the state government have a policy (DEC) that directs Western Power to not use vacant crown land where available?

- Western Power was not directed to use farming land in preference to vacant crown land, but was aware of issues associated with the clearing of native vegetation in the Mid West region where representation of remaining vegetation communities is extremely low, particularly in areas to the east of the Brand Highway. In the early stages of the corridor selection process, no areas were excluded from the corridor selection process within the large 'area of interest' (the Mid West region between Eneabba and Geraldton).
- Detailed background research was undertaken in order to determine constraints in the 'area of interest'. This included research into existing government data, stakeholder input, site visits and ultimately a Geographic Information Systems analysis of the data that was collected. Thirty-two sustainability principles were identified with input from stakeholders, covering a range of environmental, social and economic issues. Three main corridor options were subsequently identified based on this analysis (orange, pink and blue), which passed through areas, which the broad range of stakeholders had identified as being less constrained. These corridors were subsequently refined into 16 corridor options following community workshops.
- No 'no-go' zones were ever delineated during the process, however areas of greater or lesser constraint were identified and avoided throughout the process.

None of the corridors that were identified were entirely free of constraints, however the corridors were refined and selected due to their lesser levels of impacts in comparison to the more constrained areas.

- Many factors were considered in the development of the corridor options and their assessment, including issues such as capital and operational cost, impacts on existing land use and impacts on agricultural, horticultural, mining and industrial operations.
- In line with the overall theory of sustainability, the decision-making process was not made on one particular issue in isolation; rather the overall performance of each corridor option was investigated in the context of all of the factors that the transmission line could affect or be affected by in a socially inclusive, transparent and auditable manner.
- It must be remembered that the process was conducted at a strategic level to determine broad 1km wide corridors, and the draft options were refined as a result of input from stakeholders including community members during and after the community workshops. The next stage in designing a line route has involved detailed discussions with affected landowners to minimise impacts as far as possible.
- This is the first time that Western Power has included such a significant level of stakeholder engagement into this type of spatial planning process. Many of the stages undertaken for this process would normally take place behind closed doors, with the community restricted to viewing plans and commenting when line routes are already selected and designed. Western Power has taken a markedly different approach with this study, with the intention of ensuring widespread, early engagement in the process.
- Western Power, with the assistance of independent consultants SKM has identified the least impact option when considering all of the social, environmental, technical and economic impacts, following a detailed consultation programme and sustainability assessment. This is evidenced in the SKM Final Sustainability Assessment Report 2007.
- Western Power is currently welcoming any suggestions on how it can improve communications with the community in the future and how it can better encourage involvement in future processes.

Issue: The consultation process with landowners has not been transparent with landowners, particularly in the early stages.

- Western Power never restricted attendance of interested parties to any of the workshops. The workshops were structured to ensure appropriate attendance at each level, for example:
 - o Phase 2 – Design Parameter Workshops – required strategic overview of a huge area of interest. Representative organisations and bodies that could make comment about the entire region were invited.
 - o Phase 5 – Community Workshops – required localised input on draft corridor options and weighting of sustainability principles. Widespread community input was sought in order to obtain local knowledge.
 - o Phase 6 – Sustainability Assessment Scoring Verification – required a range of strategic and localised input. A combination of representative bodies and members of the local community were invited to represent their geographic area.

- Many additional parties attended these workshops on an ad hoc basis and their input was welcomed into the process.
- All aspects of the process and results were clearly documented in the Stage 1: Eneabba to Moonyoonooka 330kV Transmission Line Corridor Selection Process Report (SKM 2007).
- Stakeholders have been kept informed about the project and its progress throughout the entire process as is evidenced by the summary on community engagement contained in Appendix E.

Issue: A shorter more direct route should be undertaken, as this would reduce costs.

- Please refer to the previous answer on this point.
- It is important to note that cost is only one factor that is considered when selecting a corridor – to select a route based purely on economics would ignore the important social, economic and environmental input provided throughout the process.
- Locating the line in a shorter, more direct route would potentially incur additional costs associated with environmental implications, including purchasing land for offsets, timing and approvals implications, and potential opportunity cost for businesses and industry.
- Western Power would also be exposed to potential claims for the loss of mineral production as there are numerous mining tenements on the straight line option, as well as a significant sandmine operation south of Eneabba and gas and petroleum facilities near Dongara.

Issue: Impacts on cropping land versus grazing land.

- One of the principles evaluated in the sustainability assessment process addressed the impacts of cropping versus grazing (Minimise impacts on existing and potential land use). The assessment of this principle assumed that siting a transmission line in an area of broad acre cropping was worse than locating it in an area of grazing, largely due to input from landowners. As such, the eastern and central options (including Option 10) scored worse than the western options for this principle. This principle was however only one of many environmental, social, economic and technical issues that were taken into account in the assessment of the corridor options. A decision on the preferred corridor was not made on one issue in isolation.
- Wherever the line is located it will traverse areas of cropping and grazing land.

Issue: Viability of farming is affected.

- This line does not impact the viability of properties.
- Western Power has worked closely with landowners to determine the most suitable line route within the selected corridor and as such has been able to determine a route that minimises impacts on farming operations and economics.
- Independent agricultural consultant, Planfarm, who have been engaged by Western Power to report on the management and mitigation of these issues, has confirmed that the line route choice within the 1km wide corridor that has been negotiated by Western Power with each landowner has, in fact minimised these impacts.

- Planfarm is in the process of assessing any additional farm management costs resulting from the presence of the line on a property, and this will be taken into account in the easement compensation process.

Issue: Inadequate compensation. Why does it not consider paying annual compensation or lease payments for towers and infrastructure being located on private land? How can Western Power justify being a profit making entity yet cannot make annual rental payments?

- Detailed information sheets and presentations on compensation have been made widely available to the community throughout the process. In addition, attendees at the recent information sessions were provided with an opportunity to speak with a representative from the Valuer General's Office. Western Power has dealt with all claims of inadequate consultation in the FAQ document (see Appendix 2) and has given advice to landowners on how they could progress the issue, should they wish to take it further. It is important to note that Western Power is bound by legislation and any changes to compensation payable would require changes to this legislation.

Issue: Impacts on farming operations including weed management, biosecurity, increased cost relating to large modern cropping machinery and enterprises, insurance implications; access arrangements, dispute resolution process, OH&S issues.

- Planfarm is further investigating the abovementioned issues. They will report back to Western Power on management and mitigation issues associated with this.
- The above issues would potentially be relevant to any option selected for a transmission line anywhere in country WA.
- Western Power is committed to continue to work with landowners to minimise impacts and work together to ensure good project outcomes for itself and for landowners.
- All issues referred to are being assessed by Western Power, and this was communicated in the FAQ document (Appendix 2).
- Western Power's methods and systems are constantly improving and are under review. Any comment on how we can work better with farmers would be welcomed.
- It is important to note that only one farmer in the whole of WA has made Western Power aware of a GPS interference event that appears to be associated with a transmission line. Western Power is investigating this and has made the commitment to work with farmers on this issue.
- The sentiments surrounding the increase in costs associated with cropping operations was recognised in the principle Minimise impacts on existing and potential land use. The discussion surrounding landowner concerns with operational costs was also included in the principle relating to Avoid/reduce/mitigate impacts on agricultural/horticultural and industrial operation in the Region in Appendix L of SKM's Final Report.

Issue: Flawed consultation and communications process.

- Western Power is confident that the process has been sound and robust, with all stakeholders and community members provided with the opportunity to be involved.
- Please see explanation of the process and opportunities for input above.
- The workshops and project were widely publicised through a variety of mediums and stakeholders were regularly informed of progress.
- A summary of communications milestones is attached (See Appendix 5).

Issue: Economic Criteria dismissed in assessment

- The economic impacts were not removed from the final scoring, which considered collectively all social, environmental, economic and technical aspects. They were removed as a part of the sensitivity analysis process (as were, in turn environmental, social and technical aspects) that tested the robustness of the scoring provided, and as shown in the SKM final report, they were then returned for the final analysis.

Issue: Under representation of agricultural representatives

- Western Power does not agree with this statement. The farming community were given the opportunity to be involved, many of whom have been involved throughout the entire process.
- Representation from industry government bodies such as the Department of Agriculture and Food, Western Australian Farmer's Federation, Pastoralists and Grazier's Association, local shires (elected and non-elected representatives) and the Mingenew Irwin Group were also invited to be involved throughout.
- Following the higher-level strategic input from these groups, the broader community was invited to be involved throughout the rest of the process.
- About 85% of attendees at the community workshops were from the farming community.
- For the three workshop phases of the process, agricultural representation amounted to some 70%.

Issue: Highest ratings were for the following two principles:

'Minimise impacts on existing and potential land use'; and

'Avoid, reduce/mitigate impacts on agricultural/horticultural/mining and industrial operation in the area'.

- The two sustainability principles singled out in a submission to the ERA were indeed weighted highly. As such, the scoring provided each corridor option in relation to the topics was greater in the assessment process than lesser-weighted criteria. The principle Minimise impacts on existing and potential land use was weighted highly and it also negatively reflected areas of broad acre cropping. Yet still, in spite of this, the assessment process concluded that Option 10 was the preferred option due to the assessment process being based on a range of environmental, social, economic and technical issues, not just on one or two specific topics.
- The weighting of sustainability principles exercise was undertaken at the 'Community Workshops'. 85% of attendees at these workshops were members of

the local farming community. As such, it is incorrect to state that there was an 'over abundance of non-agricultural attendees' inputting into this process.

Issue: Agricultural consultant was engaged after sustainability assessment process was completed and agricultural impacts were not adequately considered as a part of the process.

- Western Power's initial assessment did consider agricultural impacts.
- One of the principles evaluated in the sustainability assessment process addressed the impacts of cropping versus grazing land (see principle – Minimise impacts on existing and potential land use). The assessment of this principle assumed that siting a transmission line in an area of broad acre cropping was worse than locating it in an area of grazing, largely because of the issues raised by the farming community. As such, the eastern and central options (including Option 10) scored worse than the western (including Option 4) options for this principle. This principle was however one of many environmental, social, economic and technical issues that was taken into account in the assessment of corridor options. A decision on the preferred corridor was not made based on one issue in isolation.
- During the initial stages of the consultation process, the community determined the weighting (importance) of 23 separate principles that encompassed the social, environmental, economic criteria in the assessment. The performance scoring was measured at –3 through to +3. A negative score assumed a negative impact.
- Each principle was then scored. When evaluating agricultural impacts, this was the result:
 - o Option 10 was scored at –3 as it was determined that a higher proportion of land was suitable for cropping.
 - o Option 4 was scored at –2 as it had a higher proportion of grazing land in addition to poorer cropping land.
- The information received from high level agricultural interests was also incorporated into the process. The sustainability principle 'Minimise impacts on existing and potential land use' was highly weighted at 8.8 (out of 10) by the community.
- Detailed impact studies of any particular sustainability issue relating to agriculture, environment or economics could not be conducted at that early stage of the process primarily because the precise centreline had not been determined at the time.
- It is for this reason that Western Power had planned to engage the consultant once the preferred corridor had been selected to determine suitable management and mitigation strategies.

Issue: Statements made in SKM Final Sustainability Assessment Report.

“Economic constraints were outweighed in importance by other considerations. Finally all option scores were calculated from environmental and social/cultural perspectives only”.

- This sentence was quoted from a section of the corridor selection report outlining the sensitivity analysis process (Section 10.9 of the report). The rationale for removing the economic principles from the sensitivity analysis only was to see what would happen to the scoring if a greater emphasis was placed on the social, environmental and technical aspects and not, in the case of many similar studies,

on the economic aspects. A similar exercise was conducted with the removal of the technical principles. The final scoring did not exclude the economic principles, however, various tests of the scoring were conducted during the sensitivity analysis to evaluate the robustness of the final decision.

“Low level of confidence in the sustainability principle relating to avoid/reduce/mitigate impacts on agricultural/horticultural/mining and industrial operation in the region.”

- In view of the low level of confidence in various principles including the abovementioned, a similar sensitivity analysis exercise was employed that removed low confidence principles from the assessment to see if it changed the final scoring. When the principle “Avoid/reduce/mitigate impacts on agricultural/horticultural/mining and industrial operation in the region” was removed from the assessment during the sensitivity analysis, the eventual preferred option, Option 10, again scored highest.

“At present, the qualitative assessment does not take into account the impacts of the transmission line on the operation of farms and mines. Key considerations – an alternative methodology is required to reflect the potential impacts of the transmission line.”

- In view of these concerns, the principle ‘Minimise impacts on existing and potential land use’ evaluated each corridor option in respect to impacts on broad acre cropping farming.
- To further understand the annual economic impacts and associated costs on land owners for both options 4 and 10 Western Power used a combination of data from the Valuer General’s Office (on land use and potential land use) and information quoted by the Mid West Powerline Action Group (lost production cost estimate). The assessment showed option 10 (79.3km) had only 3km of additional cropping and potential cropping land than option 4 (83.1km). It also showed an increased agricultural economic cost for option 10 to be \$12,622 per year or 4.5% higher than for option 4 across the line route section. This equates to an average increased cost per km of approximately \$159 per annum.
- While this demonstrated that farming practices rated marginally higher on option 10 than option 4, the difference of \$12,622 per annum on the whole line would not be enough to sway the outcome of the process which must also take into account environmental, economic, technical and other social factors. This confirms the outcome of the original assessment, where SKM reported that social (including agricultural land use) impacts were greater on Option 10 than on Option 4.

“Workshop participants outlined a number of ways that lines impacted on productivity including some calculations and cost estimates for reduced efficiency”

- Western Power has received numerous comments regarding the potential impacts of a transmission line on farming operations, including cost estimates provided by the Mid West Powerline Action Group. It is important to remember that many of the impacts and calculations would be applicable to whichever corridor option is selected.
- Planfarm will be considering all information received including comments from landowners who will be affected by the transmission line to minimize the impacts on farming operations, efficiency etc.

- Initial comment from Planfarm has indicated that impacts on productivity and efficiency are not major – and have been minimised by an effective choice of line route based on the preferred corridor.
- Planfarm’s findings will feed into the compensation process and if landowners feel would like to seek further advice, they will have the opportunity to consult with lawyers (at the expense of Western Power up to \$500) as a part of the easement compensation process. They will also be given the opportunity to seek independent valuation advice if they disagree with the Valuer General’s assessment.

Issue: Non-inclusion of private correspondence in report.

- Whilst only direct correspondence from owners and operators of utilities/industry in the Region is included in the report, no direct correspondence from private parties was included in the report in order to avoid breaches of privacy. The utilities/industry correspondence that was included in the report was in an appendix and it was fed into the early stages of the process. However, these stakeholders were not continually involved in the process as in the case of landowners and other stakeholders attending the workshops, whose input was continually fed into the corridor selection process.

Issue: Locating a transmission line in a conservation estate.

- Response provided in earlier text.

Issue: Remnant vegetation in the project area.

- Western Power calculations of remnant vegetation within the project area is:

	Reserves %	UCL %	Cons Estate %	Total - Reserves and UCL
THREE SPRINGS	7.9	5.6	7.7	13.4
CARNAMAH	34.5	9.2	21.5	43.8
GREENOUGH	22.5	0.9	4.1	23.4
MINGENEW	1.6	0.2	0.6	1.7
IRWIN	19.9	19.5	10.4	39.4
COOROW	26.8	6.4	17.1	33.2
Total	20.7	7.7	12.0	28.4

- The dataset "Reserves" includes Shire reserves including sporting ovals etc which are not necessarily native vegetation, therefore these figures for reserves are an over-estimate, but the best available given the data available. It is also important to note that the "Reserves" dataset includes all conservation estate, therefore, for example, the majority of reserves in the Three Springs area is a Conservation estate and 0.2% is other reserves. The Shire of Irwin has the most Unallocated Crown Land with 19.5% of the Shire area unallocated.
- The figure quoted in the submission made to the ERA cannot be matched. It may be likely that the figures included other data such as native vegetation in private holdings and on road reserves. The quality of this vegetation is not known and is not easily quantified so therefore was not included.
- An interesting point is that the majority of native vegetation within Irwin, Carnamah and Coorow is on the western section of the shires and protected within DEC estate. It is likely that a more direct route would have a significant effect on this.

Issue: More respect was attached to indigenous matters than others

- Participants in the indigenous consultation process were offered the same opportunities as farmers, as is general practice in infrastructure projects throughout the State.
- Like the detailed agricultural assessments, indigenous heritage assessments were not carried out until after the line route selection stage.

Issue: Predetermined outcome

- Western Power does not agree with this statement. From the very outset Western Power has had no preconceived ideas or preferences about where the line or corridors might be located.
- The process was designed and managed by independent consultants Sinclair Knight Merz (SKM).
- The sustainability assessment including the scoring and results has been independently peer reviewed and confirmed by Integral Sustainability as sound, robust and correct. Integral Sustainability employed several different methods to check the results and each confirmed that Option 10 was, overall, the optimum option for this project.

Issue: Stakeholder representation has been inadequate.

- Western Power has provided opportunities to a wide variety of stakeholders to be involved throughout this process.
- This has included higher-level stakeholders such as local shires and state government representatives, ERA representatives and local community members including farmers and other interested parties.
- It is interesting to note that around 85% of attendees at the community workshops were from the local farming community. About 67% of attendees at the verification workshops were Potentially affected landowners. As such, it is fair to say that the landowners affected by the transmission line have had opportunities to be involved throughout, and have been well represented either in person or by their representative organisations (Local Shires, Mingenew Irwin Group and WA Farmers Federation) at initial high-level meetings.

Issue: Suggestion that process be revisited

- Western Power does not believe that the process should be revisited.
- The process has been confirmed by an independent body as robust and the outcome sound.
- Communications with the community and stakeholders have been regular and ongoing (see Appendix 5).
- Western Power stands behind this process as an inclusive and consultative approach to transmission line corridor selection.