

Ms Leeanne Ryan  
Director Environment and Development Services  
Warrumbungle Shire Council  
PO Box 191, Coonabarabran, NSW 2357

28 April 2023

Dear Leeanne,

**Submission on the Draft Renewable Energy Benefit Policy**

Thank you for the opportunity to make a submission to the Draft Renewable Energy Benefit Policy (the Draft Policy) that Warrumbungle Shire Council (WSC) recently published for public consultation.

is a leader in whole of life cycle development, delivery and ongoing operation of renewable energy projects across Australia, with over GW of installed capacity, MW under construction, and in excess of GW in its development portfolio. has a strong history of investing revenue from its renewable energy developments back into host communities so that benefits are shared appropriately in a fair and accountable manner that builds mutual trust, confidence, and resilience. therefore has a keen interest in developing a clear understanding of the basis for the Draft Policy and its implementation and operation particularly within the context of the declared Central-West Orana Renewable Energy Zone (CWO REZ).

**WSC's Draft Renewable Energy Benefit Policy**

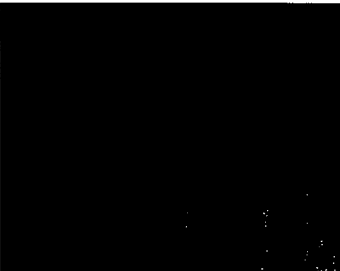
understands that the Renewable Energy Benefit Policy would apply to all renewable energy generation, storage and transmission projects within the WSC LGA and which proposes a Funding Target of a minimum 1.5% of Capital Investment Value (CIV) of the renewable energy project as a Development Contribution to be enshrined within Planning Agreements. It is also noted that the draft Renewable Energy Benefit Policy encourages developers to engage directly with community groups and other not-for-profit organisations on sponsorship arrangement for community projects.


**Key matters for consideration**

supports WSC's efforts to establish a clear position on development contributions related to proposed renewable energy projects within its LGA. however identifies several concerns about the current form of the Draft Renewable Energy Benefit Policy (Draft Policy), as detailed below.

*Basis for the 1.5% CIV Funding Target*

acknowledges that the size of wind turbines has increased and that it may be appropriate to update older planning agreements that are based on a dollars per turbine metric. However, the Draft Policy does not specify how the 1.5% of CIV Funding Target was developed and would be interested in understanding the justification for this figure. This target represents a significant increase in the development contributions compared to those. It is not clear from the Draft Policy but we assume it is to be paid over the economic life of the project which for modern wind projects is 30 years.





*Coordinated Funding Streams for Renewable Energy Investments*

██████████ is interested in providing funds directly to various community groups and welcomes the Draft Policy encouraging these Proponent-led initiatives. It should be noted that all renewable energy projects located within the CWO REZ are required to contribute significant funding to be paid via REZ Access Fees that include Community Purposes (\$1,700/MW/year) and Employment Purposes (\$600/MW/year). The REZ Access Fees are payable in addition to any development contributions made under a planning agreement.

The objectives of the REZ Access Fees have substantial overlap with the objectives of planning agreements and the Draft Policy and therefore there should be some level of recognition given to both Proponent-led funding initiatives as well as the mandatory REZ Access Fees when setting the level of development contributions to be paid under a planning agreement.

*Draft Policy Implementation for Community-centric Benefit Sharing*

██████████ supports objective three of the Draft Policy to 'provide opportunities for proponents to proactively and positively add to the betterment of our communities'. The definition of public benefit is very broad, we would be interested in having some form of governance committee involved in the selection of how some or all of the funds are spent with representation from the Owner / Proponent and also the local community.

██████████ encourages WSC to work closely with organisations like RE-Alliance (██████████) who have done valuable work to benchmark community benefits funding from renewable energy projects all around Australia, and who can share their detailed experience of what has worked and what has not in other areas.

Should you require further information or wish to discuss further please contact ██████████  
██████████  
██████████.

Yours sincerely,

