



An Australian Government Initiative



DARLING DOWNS AND SOUTH WEST

Submission to AEIC Review of community engagement practices

October 2023

About Regional Development Australia Darling Downs and South West

“Driving a thriving Darling Downs and South West for future generations. RDA DDSW is independently placed to lead with a unique regional perspective leveraging committee members local knowledge and the regional RDA networks.”

Regional Development Australia Darling Downs and South West (RDA DDSW) region covers 397,204 square kilometres in the South West of Queensland between 125 and 1,000 kilometres west of Brisbane, representing a population of 284,871 people, of who 6.2% are identified as First Nations. The region includes the 10 Local Government Areas of Balonne Shire, Bulloo Shire, Goondiwindi Regional Council, Maranoa Regional Council, Murweh Shire, Paroo Shire, Quilpie Shire, Southern Downs Regional Council, Toowoomba Regional Council and Western Downs Regional Council.

Major regional industry sectors include Health Care & Social Support, Agriculture, Education, Construction, Accommodation, and Retail. The region is also home to the quickly growing renewables industry with much of Queensland’s Southern Renewable Energy Zone sitting within the region. Gross Regional Product for the area is \$20.69billion.

Summary

RDA DDSW is actively aware of and involved in planning, issue management and community feedback around carbon transition and the renewable energy sector. There are two in-flight Renewable Energy Zones (REZ) located in our region (Western Downs REZ and the Southern Downs REZ) across both areas these zones have projects underway to produce 4,000 – 5,200 MW of renewable energy with an additional 3,400-4,400 MW

planned by 2028.¹ⁱ Our organisation has provided in the past submissions to Queensland State Code reviews and provided recommendation letters to both State and Federal Ministers on issues surrounding the renewables sector. As a result of this period of advocacy we have had the opportunity to collect considerable input into this submission from our regional stakeholders.

Recommendations

Recommendation 1: That it be required for Local Councils be engaged early in the planning process by projects and that proven communication between Local Government and the Projects be a requirement for approval of Development Applications in the case where the Development Application is not submitted to Local Government. That this communication be an ongoing requirement of the project particularly in terms of any significant changes that create additional or new local impacts, not just as a courtesy but as a ongoing requirement of their approval.

Recommendation 2: That the Government establishes Local (including CALD) and First Nations employment and procurement targets for projects both during the construction period and for ongoing operations. That these targets be publicly disclosed, tracked and reported on for each project. That all lead project proponents are responsible for consistent commitment to these targets once set, throughout all phases of the project.

Recommendation 3: Engage and empower community and industry stakeholders in identifying and achieving best practice and outcomes for their local area. To set up a network of regional leaders to learn about and share experiences of renewable energy developments to advocate in their community's best interests to achieve good outcomes from developments on behalf of local communities.

Recommendation 4: That all projects must consider -in the planning stage- and if a negative impact is likely, undertake steps to mitigate their project's negative impacts to local communities.

Recommendation 5: There must be a point of contact for concerned parties to engage with in the case of need. This need in the CSG sector was recognised and a Gas Fields Commission to manage social and economic impacts for Gas Fields developments there is a similar need for a body to facilitate understanding between parties and thoroughly understand issues in relation to all renewable projects.

Recommendation 6: That the Government investigate the practice and implications of "Land Banking" for Projects where developers are able to tie up strategically important locations ideally suited for developments and hold these parcels for extended periods of time without progressing the project.

Recommendation 7: That projects be required to identify other current and planned projects happening in the local area and be required to jointly liaise and plan across projects to identify and mitigate the cumulative impact of multiple projects (regardless of the industry)

Recommendation 8: That with immediate urgency, the Government investigate the opportunities for domestic manufacturing of components and supplies for renewable developments and if need to adjust timelines or procurement policies so that steps are taken to ensure the significant spend associated with these projects remains as much as possible onshore.

¹ [2023 Queensland Renewable Energy Zone Roadmap \(epw.qld.gov.au\)](https://epw.qld.gov.au)

Recommendation 9: That impacted neighbours be compensated for value and amenity impacts to their property. Adjoining landholders report to us concerns with impacts on their properties and liveability not adequately compensated.

Recommendation 10: Decommissioning of projects and site restoration, recycling and disposal of components. Communities are seeking clarity on the 'End of Life' process for Wind Farm Projects. Ensure these projects be responsible for returning sites to their previous condition with maximum environmental benefit and put in place safeguards to ensure that this is done, communicate these plans to the community.

Submission

R1. Local Government Involvement

Some Local Governments within the footprint of these projects currently report highly variable and often insufficient engagement with projects to ensure the Local Government has the information required to best manage the project impacts. Local Governments need clear information on project timings in order to best manage impacts for their communities. Transport impacts and road usage of these projects can be highly variable and need to be disclosed to Local Government and community. We have received reports of projects transitioning from gravel being sourced onsite for construction to gravel being transported to site from a secondary location incurring significant heavy usage on local roads with no notification to the local government who is responsible for road maintenance. Another neighbouring Local Government reports the same issue from the same project trucking in water from offsite with no notice increasing pressure on local roads.

R2. Employment and Procurement

There is currently very little transparency or consistency to employment and procurement targets set by individual project proponents, if any are set, these are often not maintained across the lifetime of each project. Commitments made to government and community at the development stage of projects are not reported on transparently throughout the project lifetime or at completion of the project. Projects should be required to set employment and procurement targets for First Nations and Local workers in line with best practice standards. In locations with identified populations such as refugees in Toowoomba on the Darling Downs these communities should also be supported by appropriate targets. Changes to targets or the ability to achieve those targets can at times be reasonably required but these need to be communicated to stakeholders in order to maintain trust for projects. The short-term construction phases for projects are a limiting factor in the ability of businesses engaged in the works to invest in developing their workforce. There is an opportunity being missed to develop the nation's workforce through these projects. Government should consider an assurance to cover the costs of completion for Apprenticeships and Traineeships for those who start their training during construction periods of Renewable Projects but would need time beyond to complete their qualification.

R3. Localised Intelligence and Empowerment

Trial a different approach to engaging communities around how they want renewable energy developments to be done and how they can capture benefits and manage risks. This needs to occur much earlier in the planning process and continue through build and operations phases. Enabling open dialogue and understanding allowing communities to better articulate their expectations of industry and government early in the process and allow for feedback and information sharing fostering broader mutual understanding of key issues for particular projects. This format would allow for the sharing of lessons learned in real time with community, industry and government to inform the policies, programs and schemes that are being developed concurrently in the race to meet Australia's renewable energy targets. Outcomes from each group could be shared with other communities to help shape understanding and develop industry best practice in achieving positive outcomes.

R4. Social Impacts

There should be an established framework for Social Impact Assessment for these projects on host regional communities and that there are protections placed against significant adverse impacts arising as a result of projects.

Social impacts include.

1. Employment
 - a. Short term local shortages due to project drain
 - b. Long term ongoing employment opportunities for operational roles
2. Housing shortages
3. Infrastructure wear and tear, damage and upgrades
4. Social
 - a. Workforce behaviour in community
 - b. Community safety
 - c. Homelessness and financial stress caused by increased housing costs
5. Environment
 - a. Impact on local ecosystems
 - b. Water use for dust suppression, camps and concrete tower bases.
 - c. Cultural heritage impacts

R5. Regulatory/Statutory Body for Renewable Energy

There is a need for an independent body to facilitate communication and information sharing between communities, renewable projects and government with an aim to achieve greater understanding between the Projects and the communities in which they operate. A centralised point of contact for issues would allow agriculture, business, government, and Wind Farms to communicate their concerns, needs and even opportunities. This body would provide the framework for the local committees in [Recommendation 3](#).

R6. Better Development Planning for Renewable Energy Zones

There is a need for greater protection and planning around prime renewable energy project locations in terms of productivity potential, location to infrastructure, grid connection potential and minimising negative impacts. Currently there are very few limitations on the practice of 'Land Banking' for renewable projects. There are no, to minimal repercussions for developers signing agreements with landholders in prime locations whilst having minimal to no capacity to progress the project in a timely manner. The result of this practice can be the progressing of projects with higher adverse impacts because the proponent is better able to deliver. Whilst there is some consideration for this being part of a natural free market outcomes there is an opportunity to achieve better overall results through better planning in the Renewable Energy Zones.

R7. Coordinated Planning thresholds and cumulative impacts.

Communities in our region are reporting frustrations with the lack of coordinated planning across projects. Locations in the Renewable Energy Zones are often dealing with a variety of current or potential energy projects including wind, solar, pumped hydro, battery, and hydrogen. Some of these projects are of a scale to trigger engagement with the office of the Coordinator General however some of the project types fall below that threshold as a stand-alone project but when the cumulative impact of all projects is considered they would fall well above the threshold. The variable types of Development Approvals (Federal, state and local government) for various types of energy projects contribute to a confusing and difficult to navigate landscape for communities and landholders dealing with these developments.

R8. Maximise local manufacturing opportunities.

With the aim of achieving Australia's renewable energy targets there are significant time pressures on projects to complete and be online as soon as possible, while from some aspects this is understandable one of the repercussions of these time pressures is that onshore supply and manufacturing has not had adequate opportunity to take advantage of the opportunities that these projects bring, resulting in the need to import much of the materials for these projects sending a significant portion of the profits and opportunity to develop industries offshore. We would advocate for the development of more onshore manufacturing to support this industry, even if this resulted in a delay on the targets, the long-term legacy for Australian Manufacturing would be a net gain.

R9. Impacts beyond immediate project footprint.

It has been recognised in some projects that adjoining landholders have seen adverse impacts requiring compensation for value and amenity loss. In our region this is demonstrated by Powerlink's implementation of compensation of property within visible range (1km) of their new infrastructure, Powerlink has recognised the impact of their projects on non-host neighbours. Renewable projects also have impacts on neighbours that do not have physical infrastructure installed this includes dust, noise and light pollution and loss of value. These adjoining residents should also have a reasonable expectation to be included in consultation for infrastructure that is often highly visible from or impactful on their residences, lifestyle or businesses. This also extends to requirement for the project to communicate with those surrounding their projects post construction and into the operation phase, projects are developing a reputation for becoming very hard to communicate with regarding issues and concerns once infrastructure is installed and they move to the operations phase.

R10. Decommissioning and project end of life.

There are community concerns that as more and more projects are undertaken there is a risk that a project may not have capacity to rehabilitate and return the site to the previous land use as required at end of life or that a project may become unviable and be shelved or abandoned. We would like to see more safeguards put in place to ensure the timely and appropriate rehabilitation of sites at the end of project. Additionally, the community seeks assurances as to the plans for recycling or repurposing of project materials and infrastructure at project end of life.

Summary

There is ongoing potential for renewable energy projects to bring considerable benefits to our region and we welcome the investment these projects bring, however we see potential for these projects to achieve a higher standard of outcomes and better manage their real or perceived negative impacts through improved planning and local level engagement.

Contact

Please don't hesitate to contact Robyn Haig, Director – Regional Development Australia Darling Downs and South West via email director@rda-ddsw.org.au or phone 07 4638 0089 should you wish to discuss any aspect of this submission.
