

9 October 2023

Hon Chris Bowen MP
Minister for Climate Change and Energy
Via email: Minister.Bowen@dcceew.gov.au

Dear Minister Bowen,

The Australian Local Government Association represents the interests of 537 local governments across the country. We recognise the importance of a fast roll out of renewable energy infrastructure including energy firming and transmission infrastructure in achieving Australia's ambition for net zero greenhouse gas emissions by 2050. However, local governments' experience shows an immense disparity in proponents' approaches, standards of consultation and benefits for communities when it comes to renewable energy infrastructure.

As leaders of our places, local governments are also striving to better understand how the Commonwealth Government's energy transition requirements will overlay with a range of other targets, including under Ministers Plibersek, Collins' and Watt's portfolios to ensure we meet biodiversity and other environmental targets, climate mapping to understand the impacts of climate change, housing targets under the National Housing Accord, and targets to ensure appropriate agricultural land use.

This submission outlines the opportunities but also the issues facing our councils with the roll out of new renewable energy infrastructure, and the need for a nationally coordinated approach to better understand, from a place-based perspective, how the Federal Government's targets will intersect with places. The following points incorporate issues raised at a roundtable discussion with Andrew Dyer, Australian Energy Infrastructure Commissioner and 14 elected council representatives from across Australia (see appendix) on 3 October 2023.

Coordination and collaboration with local government in the planning processes

The role local government plays in the development consent process varies across each jurisdiction. We face common challenges in supporting renewable energy infrastructure and call for coordination and collaboration across all governments to not only achieve better outcomes for communities but opportunities for investment in renewable energy.

It is important, for example, to ensure there are state or territory contributions plans in place to ensure local communities' benefit from local government services and infrastructure as a result of the installation of renewable energy infrastructure. Without this, the social license of the proponents is increasingly under threat.

Using steering groups in Renewable Energy Zones (REZ) that includes councils, state government and the Commonwealth (if relevant legislation applies) allows for coordination, reduced duplication of effort, address skills gaps in some councils and promotes best practice responses. This has worked effectively for the Central-West Orana REZ in NSW where the three host councils formed their own steering group and invited the NSW Government to participate.

We also call for guidelines for consent authorities and proponents with standard conditions of consent, including for provision for local government contributions. Local impacts are not necessarily being currently addressed through consent conditions. For example, in one particular case in Goondiwindi Regional Council (Queensland), the proponent came to council seeking access to limited local water supplies after the development was built bypassing consultation with council.

Some of the planning issues local government would like to see included in the guidance includes:

- Cumulative impacts for multiple renewable energy infrastructure projects.
- Adequate provision of housing for proponent's workforce, supporting local employment.
- Assessment on the suitability of the transport network including local roads and bridges.
- Waste and decommissioning so local landfills are not overwhelmed and circular economy outcomes are achieved.
- Access to water and other services.
- Appropriate safeguards on setbacks, heights, etc to protect the environment, community wellbeing and property including management of climate risks such as bushfire, heat, and drought.
- Adequate ongoing safety provisions so, for example, wires are not hung too low and land remediation is undertaken.
- Contributions plans, with clear local benefit, are created and upheld.
- Standard technical requirements to interface and connect with the distribution network.

Collaboration between the three levels of government up front to improve the state and territory regulatory frameworks is needed to improve local outcomes and expedite renewable energy infrastructure.

Community engagement

Our experience with proponents' community engagement has been mixed. Some approaches that work well include:

- Early engagement to counter the spreading of misinformation and working with community to develop a final design that can accommodate the current land practices.
- When the proponent has staff that live in the community, we have found that community members get better information rather than being directed to a webpage.

Examples of poor practice include:

- Tick-the-box approach without genuine aspirations to listen to the community.
- Use of non-disclosure agreements forcing separate negotiations resulting in a lack consistency, increased effort, and costs to the community.
- Prospecting and signing up property owners for projects that may not proceed creates community angst and makes it harder for other proponents.

The Energy Infrastructure Commissioner's proposed accreditation or licencing of proponents is supported to improve community engagement. This approach should be mandatory to prevent proponents bypassing this process. An exploration licence arrangement may also improve community engagement and social licence if managed appropriately.

Benefit sharing

In some jurisdictions, the land used for renewable energy infrastructure is not rateable. This is another example of state and territory governments cost shifting on to local government by limiting councils ability to raise revenue despite the costs generated by these activities. Costs borne by council include

maintaining transport access, managing waste and other services, consultations and advise, and dealing with concerned community members etc.

The construction and operation of renewable energy infrastructure impacts the community. To enhance community support for this vital transition to net zero emissions, models of benefit sharing must include supporting local economies through by creating local jobs and skills and through local procurement.

Competing priorities

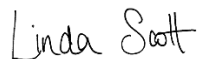
Managing competing priorities should be enabled through strategic planning and accessibility of information relating to other policy priorities. Planning for renewable energy infrastructure could be enhanced through spatial analysis of transmission network capability, national housing targets, Nature Positive Plan priorities, agricultural requirements, zoning, climate, and other natural disaster risk data.

Minister, will you commit to work with state, territory, and local governments to coordinate and collaborate on planning controls for renewable energy infrastructure that will provide certainty for investors in our renewable energy future and ensure the best outcomes for our local communities?

Will you further commit to working with ALGA, and other Federal Ministers across government, to support the creation of a national map of Federal Government targets, to allow local governments to better understand place-based assumptions we may need to uphold?

I can be contacted on president@alga.asn.au or via 02 6122 9400 should you wish to discuss this further.

Warm wishes,



Cr Linda Scott
National President

Cc: Andrew Dyer, Australian Energy Infrastructure Commissioner
Via email: cereview@dcceew.gov.au

Minister Plibersek, Minister for the Environment and Water
Minister Collins, Minister for Housing
Minister Watt, Minister for Agriculture, Fisheries and Forestry
Minister McBain, Minister for Regional Development, Local Government and Territories

Appendix: Local government roundtable participants

State	Council	Representative
NSW	Newcastle City Council	Lord Mayor Nuatali Nelmes
NSW	Dubbo Regional Council	Mayor Mathew Dickerson
NSW	Singleton Council	Mayor Sue Moore
NSW	Snowy Valley Council	Mayor Ian Chaffey
Qld	Goondiwindi Regional Council	Mayor Hon Lawrence Springborg
Qld	Flinders Shire	Mayor Jane McNamara
Qld	Banana Shire	Mayor Nev G Ferrier
SA	Wattle Range Council	Mayor Linley Shine
TAS	Central Coast Council	Mayor Cheryl Fuller
TAS	Circular Head	Mayor Gerard Blizzard
Tas	Burnie City Council	Mayor Tenny Brumby
Vic	Golden Plains Shire	Deputy Mayor Gavin Gamble
Vic	Moyne Shire	Mayor Karen Foster
WA	Shire of Augusta Margaret River	Cr Tracey Muir