



Submission to Yass Valley Council

Renewable Energy Policy SEP-POL-7

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The Australian Wind Alliance (AWA) welcomes the initiative taken by Council to develop a Renewable Energy Policy, but has very serious concerns that the first draft of this policy is deficient and requires substantial amendment. A fundamental shift towards geographically distributed wind and solar energy generation is under way across the country and Yass Valley Council is in a unique position to benefit. A Renewable Energy Policy that embraces these opportunities and outlines ways in which Council could contribute to optimum planning outcomes for residents would be of value at this time.

In contrast, however, this draft policy runs counter to Yass Valley's existing strategic framework of supporting renewable energy investment and seeks to curtail economic opportunities for Yass Valley businesses, farmers and ratepayers for reasons that are not clear. As Council is not the consenting authority, simply calling a halt to further wind farm development is a futile gesture. It abrogates Council's role in getting the best outcomes for all ratepayers. Our concern is that Council is showing a lack of leadership. It has allowed itself to be pressured by the complaints of a small number of residents and lost sight of the interests of the majority of ratepayers.

We submit that the Policy be extensively rewritten to responsibly embrace the positive economic and social contributions from wind and solar development, as it would similar contributions from any other large-scale infrastructure opportunity.

Strategic Context

The South East and Tablelands Regional Plan 2036, described in the Yass Valley Settlement Strategy as “The primary strategic policy document relevant to this strategy”, explicitly outlines the opportunities for hosting renewable energy developments in *Direction 6: Position the region as a hub of renewable energy excellence*. Action 1 in this Direction is to “Identify opportunities for renewable energy industries.” With its world class wind resource, extensive areas of cleared, lightly populated agricultural land and ready access to the state’s high voltage transmission infrastructure, Yass Valley has opportunities for hosting wind and solar infrastructure as good as any other council area in the state.

This is further supported by the Yass Valley Economic Development Strategy 2014-2017 which prioritises attracting, retaining and growing small business in the area, as well as “investigating renewable energy production (solar and wind) opportunities which could supply the ACT Renewable Energy target”. While the ACT target has now been reached, the cost competitiveness of wind and solar generation has guaranteed that these technologies will continue to be adopted throughout Australia’s entire energy grid. In neighbouring Upper Lachlan Shire, wind and solar projects have demonstrated their capacity to drive small business opportunities in small and medium towns.

The Yass Valley Settlement Strategy does not recommend against renewable energy developments, only suggesting that “Future development, particularly at the residential/agricultural and the residential/industrial interfaces should be planned for and managed to minimise potential conflict between adjacent land uses.”

In summary, Yass Valley’s key strategic documents clearly identify renewable energy projects - wind and solar alike - as a key driver of economic opportunity in the region. Imposing an arbitrary and unjustified withdrawal of support for wind projects in this draft policy runs counter to the direction outlined in these strategic documents.

Project context

Contrary to the implications of the first paragraph of the Policy’s Introduction, Yass Valley Council does not yet have a single turbine or large-scale solar plant installed in its LGA.

There are four wind farms approved which are either fully or partially located in the LGA. These are the Rye Park Wind Farm (approved in 2017), the Bango Wind Farm (approved in 2018, subject to a challenge in the Land and Environment Court), the Yass Valley Wind Farm (Modification application currently before the Independent Planning Commission), and the Conroy’s Gap Wind Farm. While approval for Conroy’s Gap was received in 2011, work has not commenced on the project and it is considered unlikely to proceed.

The majority of the 242 turbines permitted in the three active projects are located in neighbouring shires. Only 51 of the permitted turbines are proposed in the Yass Valley Council. This is not a major impost in an LGA of 4,000 square kilometres.

Specific Comments

At **Clause 4A**, the Policy states “[Council] has reached the maximum number of industrial scale turbines for the local government area” but it is far from clear what that “maximum number” refers to. Is the “maximum number” reached once 51 turbines have been constructed in the LGA? In the event that one or more of the projects didn’t proceed and some of those 51 turbines were not built, would Council support a new project to make up that shortfall? What are the reasons Council considers this 51 turbine figure to be some kind of upper limit? Does the Policy also envisage some “maximum number” of solar farms? Are there any Council policies that set out “maximum numbers” of any other developments, such as housing subdivisions?

Clause 4B makes clear that the target of this policy is not renewable energy, but specifically wind farms. In fact, the Policy’s intent is not to aid responsible development, or secure economic benefits, but rather to call a halt to wind development. In our observation, while a limited number of Yass Valley’s ratepayers living near planned wind farm projects are clearly exercised about the issue, it is unlikely these concerns are shared widely throughout the LGA. Indeed, it ignores the active support of the technology from a significant proportion of residents, including from the many farmers who seek to reinforce the viability of their farms with income from hosting wind turbines.

A balanced and proactive Renewable Energy policy should note the benefits Council seeks from locating developments in its LGA. It should also make clear its position in regard to the other likely source of new development - large scale solar. Is there a reason why Council opposes wind development but not solar development? As it stands, there is little in this policy to support the statement that the Council is “supportive of renewable energy in general”. It may be more honest for Council to make clear to its ratepayers that it isn’t supportive of renewable energy and instead prefers to put the issue into the “too hard” basket.

Clause 4C presents further confusion. If Council is opposed in principle to further wind farm development, how is it to “consider any further proposed renewable energy projects on its individual merits”? Clause 4B has already made clear that the only merit the Policy is interested in is whether or not the proposed development is a wind farm.

To allow Clause 4C to be in any way practical, Clause 4B should be removed. This would allow Clause 4C to lay out parameters for Yass Valley Council Planning staff to use to develop submissions on major projects proposed within the LGA.

The NSW Department of Planning and Environment assesses major renewable energy projects in the state, with the Independent Planning Commission as final consent authority. The Policy should therefore focus on what Council through their Planning staff can most valuably contribute to that assessment process.

If we were to assume that Council actually does intend to “consider any further proposed renewable energy projects on its individual merits” - a dubious assumption - the matters listed are of mixed value:

- It is prudent for Council to be setting policy on matters over which it has some jurisdiction, but it is confusing to introduce new policy that contradicts existing policies:

- 1. Yass Valley Settlement Strategy - Section 8 of this Strategy sets out a range of challenges and opportunities to be considered in regard to Land Use, Employment Base and Climate Change. On each of these, wind farms carry numerous advantages in keeping farmers on the land, creating employment and mitigating greenhouse gas emissions. The village of Bookham is seen to have tourism opportunities “which may be complementary to the recently approved Yass Valley wind farm between Bookham and Jugiong.”
- 5. & 6. Roads and Benefit Sharing - Council is right to argue that its Roads Standards and Community Enhancement Fund Policies be adhered to. Yass Valley should take some pride from being the first Council to deliver a policy on Community Enhancement Funds for wind farms.
- It is redundant for Council to re-prosecute matters that are already rigorously assessed by processes relevant to State Significant Developments:
 - 2, 3, 4, 7, 9, 11. Visual, noise, heritage, fire, tourism, amenity. The NSW Department of Planning & Environment’s Wind Energy Guideline lays out rigorous processes in these areas to which wind energy proponents must adhere to obtain project approvals. To take two examples, noise and visual impacts are rightly scrutinised in a sophisticated and often highly technical manner to ensure the safety and amenity of residents. It is unclear what value Council could add in an area like acoustic assessment of a wind farm proposal that the Department has not already assessed in considerable detail and at considerable cost. Is Council proposing hiring of consultants to double-check work done for the Department and if so, at what cost?
- Any consideration of the economic and social impacts on local communities and Yass Valley (Matter 10) needs to note the significant economic benefits of wind farm construction and operation. To focus on “impacts” only and ignore benefits would be churlish.

Expected benefits to the Yass Valley region from the construction of the 51 permitted turbines will be measured in the tens of millions. Each of the three projects will draw heavily on businesses in Yass and the surrounding region, driving much needed jobs and economic activity. Approximately \$1m per annum will be paid to farmers who can use this guaranteed income to guard their businesses against drought and community price fluctuations and strengthen the farming economy of the region. Importantly, neighbours will receive payments through neighbour agreements at all three projects. Social benefits from Community Enhancement Funds are substantial with over \$200,000 per annum made available to support community projects and groups in the area.