

03/03/2021

Re: Submission on Draft RENEWABLE ENERGY COORDINATION FRAMEWORK

Thank you for the opportunity to discuss some concerns about the above Framework on Friday 26th February. As you know, I am a member of the No Turbine Action Group which has made a submission to the Renewable Energy Committee and represents a large number of community members who strongly believe the St Patricks Plains Wind Farm proposal in the Central Highlands (Midlands REZ) is in the wrong place. There was no community opposition to the nearby Cattle Hill Wind Farm Project which commenced operation in January 2020 because it has smaller towers and is in a better place.

My understanding of the Framework is that the energy targets in the document are arbitrary, are not based on current research or future trends, do not take into account ambitious energy generation projects in other States and have been imposed on the Tasmanian community with a very poor process of community consultation. Feedback via a survey and the opportunity to submit comments do not constitute rigorous consultation or convince that 'the heart of this Framework is communities and fostering partnerships', as described in the Framework Introduction. Renewable Energy Zones have been established with no stakeholder engagement at local government level or with communities within the 3 broad sweeping Zones.

Objective 1 Achieve our Tasmanian Renewable Energy Target

- 200% renewable energy target has had no community consultation and thus has no social licence in the Tasmanian community. It is dependent on the Marinus Link which has no financial backing. Uncertain energy markets and fluctuations make Tasmanian projects high risk.
- Renewable energy developments in other states need to be factored into the requirement for Tasmanian energy projects.
- It is a concern that alignment of policies, review of EMPCA and guidelines for developments on Crown Land associated with this goal will be 'delivered' with no mention of how collaboration will occur or the process for strategic decision making.

- Guidelines to ensure the appropriate location and site selection of developments based on environmental, visual, health, social, heritage and cultural criteria have been omitted.

Objective 2 Establish Tasmania's Renewable Energy Zones

- The 3 Tasmanian REZ have been broadly determined based on limited industry criteria with no consideration of social, environment, landscape, heritage or community needs.
- The Midlands REZ has been identified as important to complement Marinus Link when it is the furthest away.
- The Framework needs to identify processes for mapping of Turbine Free zones within each REZ.
- The Framework is based on a responsive or reactive model of community engagement rather than a proactive or inclusive rigorous model.
- The Wind Farm Commissioner in his 2019-20 Annual Report made the following recommendation for consideration in relation to the governance, development and operation of wind farm projects:

8.2.1. State/Territory and local governments should consider assessing proposed wind and solar energy projects on a wider range of criteria (including ability for power output to be transmitted and consumed, the suitability of a location from a community impact perspective and the degree of community support) and then prioritising projects for approval or progression accordingly. 'Reverse auction' feed-in tariff schemes such as the schemes deployed by the ACT and Victorian governments, could be an example of how to prioritise and incentivise projects to be developed in preferred locations. These schemes can also promote best practice community engagement. Visual amenity guidelines such as the *Wind Energy Visual Assessment Bulletin for State Significant Wind Energy Development* introduced in New South Wales in 2016 can also restrict development in more populated areas, including assessing the acceptability of multiple wind farms in a given location.

Objective 3 Partner with our communities

- The Framework completely fails to outline best practice community engagement processes for the development of Renewable Energy Projects.
- Research shows that early involvement of community members is crucial to the success of the development of major projects.
- The Wind Farm Commissioner's 2019-20 Annual Report recommends the following for consideration in relation to the governance, development and operation of wind farm projects:

3.2.1 The developer should ideally commence and invest early in community engagement – well before the commencement of the permit approval phase.

3.2.2 The developer should proactively identify and establish effective working relationships with key community stakeholders, including stakeholders that may be opposed to the project.

3.2.3 The developer should, in consultation with the responsible authority and the community, consider establishing a CCC (or equivalent) with an appropriate charter and membership (noting that in some jurisdictions, a CCC may be mandated). The CCC Chair should, where practical, be a respected and representative member of the community at large as well as independent of any direct impact or beneficiary of the proposed project. Ideally, the CCC should meet monthly during critical stages of the project's development, approval, construction, post-construction testing and initial operations.

Thank you for the opportunity to comment on the Framework. The future of Tasmania is in the hands of all Tasmanians who feel strongly that our identity and brand as an environmental treasure island should be fiercely guarded. We appreciate the value of renewable energy to

Tasmania and the nation, however, processes need to be truly collaborative and follow best practice examples to ensure we do not lose the very elements that constitute our unique identity. Renewable energy targets need to be honest and realistic; accountability measures need to be robust and transparent, and projects need to be in the right place.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Victoria Onslow', followed by a small dot.

Victoria Onslow

