



5 December 2024

Draft Renewables
Regulatory Framework

WESTERN DOWNS REGIONAL
COUNCIL SUBMISSION

5 December 2024

Sent via email: renewablesframework@epw.qld.gov.au

Dear Sir or Madam,

RE: SUBMISSION OF THE DRAFT RENEWABLES REGULATORY FRAMEWORK

Western Downs Regional Council (Council) oversees a vibrant local government area spanning 37,937 square kilometres, serving a diverse population of approximately 35,000 residents. Our region thrives on a robust foundation of agriculture, intensive agriculture, energy, and manufacturing industries. These sectors are bolstered by a rich and diverse workforce, including a significant number of migrant employees, who contribute to the social and economic fabric of our community.

We sincerely thank the Department for seeking feedback on the proposed regulatory framework to make sure energy infrastructure is developed responsibly and supports strong, sustainable energy communities across regional Queensland, which is of strong interest to our Council and our residents.

Enclosed is the Council's comprehensive submission for your consideration, detailing out perspectives and recommendations on the framework. We believe that the insights provided will offer valuable contributions to the review process and help shape policies that foster growth and inclusivity in regional areas like ours.

For any further information or questions, please contact Lidewij Koene-Sloss, Economic Development Manager, via email lidewij.koene-sloss@wdrc.qld.gov.au or M: 0409 786 759.

Yours Sincerely,

Jodie Taylor
CHIEF EXECUTIVE OFFICER

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About the Western Downs Regional Council

The Western Downs is located on the Darling Downs, approximately 207 kilometres north-west of Brisbane and 83 kilometres north-west of Toowoomba. The region encompasses the centres of Dalby, Chinchilla, Jandowae, Miles, Tara, and Wandoan, covering nearly 38,000 square kilometres. Combining country lifestyle with modern living, excellent retail offerings and conveniences, the area is home to a population of around 35,000 people and has a large working age population of 60.9% aged 15-64 years.

Built on agriculture and thriving in the intensive agriculture, energy and manufacturing industries, Western Downs Regional Council is focused on making our region a great place to live, work, visit and invest and to ensure our future generations have the opportunity to do what they love whilst enjoying a regional lifestyle and continue the strong economic growth.

Council manages Australia's second largest road network with highways leading into the region including the Bunya, Leichhardt, Warrego & Moonie, an extensive water, gas, and sewage network, and one of Australia's largest cattle saleyards. Located in the heart of the resource rich Surat Basin, the Western Downs has a diversified energy portfolio with five pillars of energy generation: Coal, Gas, Hydrogen, Wind and Solar, supported by battery energy storage systems (BESS), cementing our reputation as the Energy Capital of Queensland. This contributes to the region's strong economic growth, investment, and consistently high employment with a GRP of \$5.91Billion.

Council's five-year [Economic Development Strategy](#) (2023 to 2028) addresses critical issues and clearly articulates a strategic pathway for the Western Downs to diversify and grow its economy, building on the region's competitive advantage and further attracting business and investment in value-adding opportunities and emerging markets. The Economic Development Strategy focuses on five key pillars:

- **Jobs & Skills** - The Western Downs workforce is growing, optimised and fit for the future.
- **Liveability & Infrastructure** - The Western Downs is equipped with modern infrastructure and quality essential services across the region to enable liveability and wellbeing, whilst sustaining population growth.
- **Population** - The Western Downs demonstrates population growth to meet workforce demands.
- **Productivity & Innovation** - The Western Downs is a recognised leader in agribusiness, energy and manufacturing, and local productivity continues to increase.
- **Sustainability & Resilience** - The Western Downs is future-proofed for a changing climate and transitioning economies, and circular economy principles are stimulated.

This strategy aligns closely with the Council's [Corporate Plan](#) and supports one of Queensland's most progressive [Planning Schemes](#) which is committed to attracting and enabling development and ensure the Western Downs is a diverse region at the forefront of the changing world.

Executive Summary

Western Downs Regional Council (Council) has reviewed the Queensland Government's Draft Renewables Regulatory Framework and offers this comprehensive submission to support the development of a robust and sustainable energy infrastructure. Council oversees a diverse region with a strong foundation in agriculture, intensive agriculture, energy, and manufacturing, and is committed to ensuring that the transition to renewable energy benefits all community members, following Council's commitments made in the Economic Development Strategy and Communities Partnering Framework.

Council wishes to commend the State Government on the development of the Draft Renewables Regulatory Framework, and note that the intent meets the criteria of our Communities Partnering Framework, including (1) building trusted partnerships, (2) growing a strong and diverse economy, (3) growing liveability, (4) supporting 'the people that make it', (5) care for our environment, and (6) meaningful partnerships with the First Nations community. Council considers that the Draft Renewables Regulatory Framework is well positioned to address current challenges experienced in host communities and enabling legacy benefits. Effective community participation is crucial for the success of renewable energy projects. Council supports initiatives that foster collaboration between government, industry, and local communities, ensuring substantial and lasting benefits, and would like to address the need for clear guidelines for the early engagement with local governments. Transparency and ease of access to information about renewable energy projects are vital. Council supports the creation of an online portal for project mapping and a notification scheme to keep residents informed.

Protecting landholders' rights and ensuring fair compensation are essential. Council welcomes the development of toolkits and model contracts to support landholders during the energy transition. Efficient industry facilitation is necessary to attract investment and support economic growth. Council supports the State Government's efforts to enhance environmental outcomes through strengthened regulations and collaborative assessments. Council advocates for high standards of environmental assessments and the integration of end-of-life recycling into renewable projects. Council emphasises the need for strong practices of co-existence between industries, as well as the protection of Class A Agricultural Land to ensure stability for the agricultural sector.

The Draft Renewables Regulatory Framework addresses the need to foster a circular economy. The Western Downs is well positioned to diversify the economy through the manufacturing of parts and components, as well as for a recycling and resource recovery facility. This would enable economic growth through new value-adding supply chain opportunities and enabling long-term workforce opportunities. Council supports the vision of the Queensland Government's Energy and Jobs Plan and recommends further actions and clarity for actionable items to ensure effective implementation. Council remains committed to collaborating with the State Government to achieve the ambitious goals of the Energy and Jobs Plan, ensuring sustainable growth and prosperity for the region.

Recommendations

Council offers the following recommendations to enhance the effectiveness and implementation of the Queensland Government's Draft Renewables Regulatory Framework:

1. Enhanced Environmental Outcomes:

- Strengthen environmental assessments and compliance through continued collaboration between state and local governments.
- Integrate end-of-life recycling and circular economy principles into renewable energy projects, with recommended state government and industry to invest to support for Research & Development.

2. Effective Community Participation:

- Develop and implement strategies that promote strong coexistence and mutual benefits, aligned with the Council's Communities Partnering Framework.
- Clear guidelines for the early engagement with local governments.
- Serious consideration needs to be given to accommodation and housing needs for construction workforce during the planning phase of major projects, and the cumulative pressures of multiple projects on social infrastructure.
- Developers to invest in new housing stock for their operational staff ahead of the commencement of construction to help relief housing pressures and positively contribute to the communities they operate in.
- Invest in regional and local projects aimed at capacity building and enabling the current and future workforce to become active members of the energy transition.

3. Enduring Landholder Protections:

- Provide clear information and fair compensation for landholders impacted by renewable energy development.
- Ensure comprehensive end-of-life planning and protections for renewable energy projects.

4. Efficient Industry Facilitation:

- Extend local government involvement in the determination of Renewable Energy Zones (REZ) and facilitate investment attraction.
- Advocate for legacy investments that enable a circular and sustainable economy for current and future residents.

- Address infrastructure limitations proactively, allowing time for industry and communities to collaborate on enabling the Energy and Jobs Plan energy transition.

5. Addressing Challenges:

- Develop a comprehensive strategy to tackle the lack of recycling and reuse solutions across the state, including financial incentives, grants, and subsidies to encourage innovative recycling technologies.
- Holistic and whole-of-industry workforce and housing planning, considering cumulative impacts of project developments.
- Invest in regional digital connectivity to bridge existing telecommunication gaps.

6. Protection of Agricultural Land:

- Protect against developing renewable energy projects on Class A Agricultural Land to ensure stability and productivity for the agricultural sector.
- Promote the co-existence of both the energy and agricultural sectors, ensuring mutual benefits and land-value stability.

7. Community Benefit Sharing Program:

- Provide guidance on Community Benefit Sharing to ensure benefits are shared equitably and communities have a say in how these benefits are utilised.
- Establish a coordinated approach to benefit sharing, making it easier for renewable energy companies and communities to collaborate effectively on community benefit projects.

By implementing these recommendations, the Queensland Government can enhance the statewide adoption of the strategy, increase the uptake of renewable energy, and address the highlighted issues. Council remains committed to collaborating with the State Government to achieve the ambitious goals of the Energy and Jobs Plan.

Submission

Council strongly advocates for additional funding to support Coexistence Queensland in fulfilling its critical mandate across our region. This position aligns with a motion endorsed at the Local Government Association of Queensland (LGAQ) Annual Conference in October 2024, underscoring the importance of strengthening this statutory authority's capacity to serve resource-rich communities effectively.

Council has consistently recognised the invaluable work undertaken by Coexistence Queensland, from its origins as the GasFields Commission to its expanded remit today. The authority's role in fostering balanced outcomes between the energy sector, agricultural stakeholders, and local communities is indispensable, particularly in regions like the Western Downs, where these industries coexist. Its efforts in mediation, stakeholder engagement, and ensuring equitable outcomes have been instrumental in mitigating potential conflicts and promoting long-term regional sustainability.

Council has maintained a collaborative and constructive working relationship with Coexistence Queensland, a partnership built on mutual respect and a shared commitment to the prosperity of our region. We commend the Queensland Government for its ongoing support of this statutory authority and urge continued investment to enhance its operational capacity with its expanded remit.

By bolstering Coexistence Queensland, the State Government can ensure the authority remains equipped to address the complexities of regional development, support sustainable land-use practices, and empower communities to actively participate in shaping the future of the energy and agricultural sectors. This commitment will not only solidify Queensland's leadership in coexistence management but also serve as a model of best practice nationally.

Council stands ready to continue working alongside Coexistence Queensland and the State Government to ensure the long-term success and resilience of our shared communities.

1. Do these initiatives effectively contribute to the desired objectives including enhanced environmental outcomes, effective community participation, easy access to information, enduring landholder protections, and efficient industry facilitation?

A. Enhanced Environmental Outcomes

Council shares and supports Queensland Government's goal of enhanced environmental outcomes for renewable energy projects. Council is in general supportive of initiatives proposed in point 1.1, *improving environmental assessments and compliance*. Council is looking forward to working with the Queensland Government, communities and industry to facilitate the delivery of point 1.2 of *focusing on outcomes and strategic planning*. Council strongly supports the development of regional manufacturing industries, including efforts and investment made by the State government and industry in enabling a circular economy as expressed in point 1.3, *fostering a circular economy*.

Council acknowledges the importance of enhancing environmental outcomes and supports the State Government's efforts to strengthen the wind code and review the planning framework for renewable energy. Council believes in the value of collaboration between State and local government to improve environmental assessments and compliance. Council advocates for the highest standards of environmental assessment for developments of this nature and emphasises the importance of timely and participative consultation with landowners and host communities.

Council supports the integration of end-of-life recycling and the creation of circular economy principles into renewable projects, underpinned by State Government investment in research and development. Council recognises the need for proactive, precise, and swift action to achieve the State's strategic energy goals and targets, and commends the strong partnerships built over the years.

Council is actively attracting new recycling and resource recovery facilities to establish our region to support the end-of-life requirements of project developers investing in renewable energy projects in our region, now and in the future.

Council is committed to continuing its role in supporting renewable energy developments and believes in the importance of building trust with communities through enhancing effective environmental outcomes. Council supports the State's commitment to do so as part of this regulatory framework.

B. Effective community participation

Council shares the goal of effective community participation in the planning, development and implementation of renewable energy projects. Proposal 2.1, *enhancing engagement and leading practice, including with First Nations peoples*, is found to be effective by council if aligned with the principles found Communities Partnering Framework. Council finds point 2.2, *ensuring local benefits for host communities* could be more effective if more aligned with council's previous advocacy submissions and expressed positions. Council commands and strongly supports the Queensland Government's proposal of point 2.3 of *boosting local jobs and economic development*.

Council strongly understands and aligns with the Queensland Government's vision on effective community participation and deeply believes in the role communities play in facilitating the development of renewable energy projects. Council is committed to ensuring that the energy transformation in our region brings substantial and lasting benefits. Effective community participation is the key to supportive initiatives that address cumulative impact, identify local and strategic needs, enable legacy investment, and fostering strong partnerships.

Clear guidelines for the early engagement with local governments would strengthen effective community participation. Council supports initiatives that foster collaboration between government, industry, and local communities. Council is committed to working with stakeholders to develop and implement strategies that promote positive coexistence and mutual benefits. The Code of Conduct proposed in the regulatory framework aligns with Council's Communities Partnering Framework to ensure that developers and local communities build trusted partnerships.

Council supports the State's investment in regional and local projects aimed at capacity building, enabling the current and future workforce to become active members of the energy transition. Council welcomes the development of new key skills training facilities in North Queensland and advocates for investment in our region to provide the systems to train for our current and future skills needed. The mining industry represented 1,359 workers in Western Downs (7.3% of our workforce) from 2022 to 2023 according to the National Institute for Economics and Industry Research. The transitioning out of coal for energy production will necessitate parts of this workforce needing to be retrained to allow for their transitioning into new job opportunities in regional Queensland. This could help support the re-skilling of energy workers from coal and gas to renewable technologies.

The Regional Economic Futures Fund is a key project that allows Council to develop place-based solutions that support the energy transition and community participation, and Council continues to welcome the State Government to fund such initiatives. Council acknowledges the significant workforce, employment, and housing impacts associated with large-scale renewable energy projects and supports measures that ensure these impacts are managed effectively to benefit our local communities. This will require holistic and whole-of-industry planning to consider cumulative impacts of project developments. The framework shares

alignment with Council's Communities Partnering Framework, including expectations from developers on supporting local workforce development, investing in long-term housing, and enabling engagement and procurement opportunities for local businesses and First Nations peoples, which Council is supportive of.

Serious consideration needs to be given to accommodation and housing needs for construction workforce during the planning phase of major projects, and the cumulative pressures of multiple projects on social infrastructure. In addition, Council advocates for developers to invest in new housing stock for their operational staff ahead of the commencement of construction to help relief housing pressures and positively contribute to the communities they operate in.

Council advocates for clear and transparent standards for community benefit contributions and supports the development of this Draft Renewables Regulatory Frameworks. This should ensure that benefits are shared equitably and that communities have a say in how these benefits are utilised. Council strongly supports legacy investments that provide long-term benefits to our communities. Improved telecommunications infrastructure will enhance connectivity, support local businesses, and improve the quality of life for residents in our region.

C. Easy access to information

Council strongly supports the easy access to information. Council looks forward to working with the State Government to implement all points find in this section, quickly and effectively.

Council believes that the State Government's proposition to increase the ease of access to information regarding renewable energy and jobs is effective. Council sees improving the transparency of the renewable energy pipeline of significant importance to our residents. Residents often express difficulty in understanding and gaining clarity and reliable information about renewable energy projects near their homes or those happening around them. Council is supportive of having a comprehensive online portal with project mapping which gives clear transparency to our community members of projects across Queensland and in our region. The success of this framework will be based on the urgency with which it will be developed, considering that a number of prospective developers are currently engaging with landholders.

A notification scheme would be an effective initiative to ensure residents near renewable energy projects are given due notice and the ability to express their views to the relevant parties. Council suggests that project developers should have the primary responsibility to notify communities by using existing communication methods such as letterboxing to ensure proper receipt, including in rural and hard-to-reach areas.

Council also believes that project developers have the key responsibility of conducting open and transparent community engagement. Council believes it is important for the State Government to empower developers to understand effective community engagement throughout

the phases of project development, ensuring they provide reliable and timely and provide reliable information to the community.

Council also strongly believes that increasing renewable energy literacy is crucial to help implement and gain support for the Energy and Jobs Plan. In our region, agencies like Queensland Renewable Energy Council and Co-Existence Queensland have both worked together to deliver the first inaugural Queensland Renewable Community Forum held in Miles in July this year. This forum saw 120 community members, as well as persons external to our region who are affected by energy developments, attend to try and get a better understanding of the energy landscape in the Western Downs region and Queensland, and the aims and opportunities of the energy transition. It is without a doubt that the information and knowledge they were provided with will further trickle down throughout the community and help build strong community support for renewables. Council sees initiatives like this as extremely valuable and key in ensuring that rural communities are actively included in the debate and is supportive of further approaches to increase energy literacy and education.

D. Enduring landholder protections

Council shares the views of the need to provide for enduring landholder protections. Council finds most points made in this section to be effective with some recommendations on how to enhance the delivery of this goal and coexistence of both agricultural and energy industry.

Considering the Western Downs' location at the heart of the energy transition, and it's leading agricultural and energy industries, Council emphasises the importance of landholder protection in this community feedback response. Council welcomes the State Government's proposition to improve support and fair compensation for landholders. Council supports the State Government collaborating with the Queensland Farmers' Federation to develop toolkits and information solutions to support landholders during the energy transformation. Council also acknowledges the contributions made by Co-Existence Queensland and the role it plays in providing information to landholders and in supporting their rights.

Council supports the delivery of clear information about renewable energy projects, ensuring landholders and communities can build informed decisions and opinions. Council also welcomes initiatives aimed at providing fair compensation for landholders impacted by renewable energy development. Council welcomes the State's proposition of bringing financial support for landholders to access legal representation. Drafting model contracts for landholder agreements and integrating them with QFF's toolkit would also assist landholders effectively. Council continues to advocate and support, as per our Economic Development Strategy and our Communities Partnering Framework, for the collaboration and mutual benefit of both the agricultural sector and energy industry.

Council also welcomes the State's proposition within the framework to create clear escalation pathways and enforce comprehensive end-of-life planning and protections. Council has

worked closely with both project developers and communities to improve communications so they could establish a space for mutual benefit. Council is proactively attracting the development of a local circular economy that will be essential in providing for the systems required in the sustainable end-of-life of renewable energy projects.

Council recommends further work to enhance the effectiveness of point 4.4, *undertaking strategic land use planning* and on mitigating the cumulative impacts of combined development in a region. As the rapid growth and uptake of renewables may change the landscape of our Queensland countryside. We would advocate for this consideration in the strategic land use planning and within the early cumulative impact analysis of REZ planning.

Council has experience as a local government in undertaking strategic land use planning and has demonstrated leadership as a local government approving 24 solar farms since 2016, as well as other multi-use land use developments, for example CS Energy's Kogan Creek Energy Hub which evolves the coal-fired power station into an Energy Hub with the development of a 100MW/200MWh grid-scale battery and a hydrogen production facility. Council's leading role of attracting renewables developments across vast parts of the region, Council also takes a stance for local protection of Class A Agricultural Land. The risk to high quality cropping lands within the Western Downs is real, and whilst Council has been an industry leader with fast and efficient assessment of solar farms, our policy position is that solar farms should not be established on our iconic and productive cropping land and can be established on some of the less productive agricultural land. Council supports the State Government's in undertaking such a task statewide and supports its rapid implementation.

E. Efficient industry facilitation

Council finds to be effective and will continue to advocate for and contribute to ensure the most efficient industry facilitation. Council is continuing in its mission to advocate for industry to invest in Western Downs and help deliver the energy transition.

Council recognises the important role it can play in assisting the State Government in implementing and advancing its Energy and Jobs Plan, a plan which presents significant business and economic opportunities for our region. Council strongly encourages and welcomes efficient industry facilitation.

Council appreciates the recommendations outlined in proposition 5.1 regarding *streamlining processes and facilitation*. While recognising the potential benefits, the Council suggests that involving the Coordinator General might inadvertently slow down overall processes. As a local government, the Council prides itself on its expertise in assessing and approving developments swiftly, thoroughly, and efficiently. To support the goals of the Energy and Jobs Plan,

Council recommends investing in local governments to facilitate processes locally, ensuring that efficiency is maintained across Queensland.

Council supports the State's proposition of extending our involvement in the determination of REZ, being involved in the coordination between communities and the industry and facilitating investment attraction.

Council's Economic Development strategy is designed to work collaboratively with key partners, including the Chambers of Commerce and Industry across the region, to grow a thriving region with suitable jobs and skills, liveability and infrastructure, population, productivity and innovation and sustainability and resilience. A strong methodology to infrastructure agreements further supports the investment in critical infrastructure. Council's Communities Partnership Framework further deepens Council's commitment to work on creating harmony to provide economic growth and regional benefit.

Council advocates for legacy investment that will enable a circular and sustainable economy for the current and future residents of Western Downs. Council proactively addresses current infrastructure challenges and opportunities and firmly advocates for the build of Nathan Dam and the Goondiwindi to Gladstone extension of Inland Rail enabling significant decarbonisation industry opportunities, investment on our state-controlled roads and national highways, telecommunications and digital connectivity network, as well as social attributes such as the health care and childcare workforce. Continued investment by the State Government is essential to assist with the plan's delivery and ensure sustainable capability growth. Council continues to advocate for increased investment in regional and rural Queensland, emphasising the need for enabling infrastructure to meet residents' service expectations.

Council welcomes the potential for future collaboration between our teams and Co-Existence Queensland Smart Energy Council, Clean Energy Council, and Queensland Renewable Energy Council. Council will continue to work with the industry partners identified and leverage opportunities to resolve emerging challenges and improve investment, the business environment, and Queensland's economy. Council values the State Government's support in helping local governments and our residents work towards Queensland's energy strategy and wishes to continue this collaborative, participative, and proactive approach. Therefore, Council strongly supports the Queensland Government working with local government in the delivery of the Energy and Jobs Plan in a collaborative and constructive approach.

2. What potential challenges do you foresee in the implementation of these initiatives, and what strategies or solutions could help address them?

A. Enabling a circular economy

Council sees the lack of recycling and resource recovery solutions across the nation as a potential challenge for Council and the State to enhance environmental outcomes and foster a circular economy. In the recent Renewable Recycling Summit attended by Council, hosted by the Department of State Development in the Darling Downs, it was reported that there are only one or two businesses in the nation that have the capacity, technology, and knowledge for solar panel or wind turbine recycling.

Council proposes the State Government consider a comprehensive strategy to tackle the lack of recycling and reuse solutions across the State. Recognising the critical need for sustainable waste management, Council suggests that the State Government invest in building regional capability and industry to allow end-of-life recycling to be completed in the region where the project is proposed to enable long-term economic growth and diversification and strong workforce opportunities. Enabling circular economy practices close to the projects further assists Queensland's decarbonisation goals. This aligns with Council's vision of fostering long-term industry diversification and growth through this energy transition process.

Examples of initiatives include providing financial incentives, grants, and subsidies to encourage businesses and research institutions to develop and implement innovative recycling technologies, establishing state-of-the-art advanced recycling facilities and infrastructure for renewable energy component recycling, direct investment or public-private partnerships with companies that have the capability to complete recycling energy components to be established in the regions, investing in research and development and promoting the development of innovative recycling technologies, and creating educational programs to raise awareness about the importance of recycling renewable components and the benefits of sustainable practices.

Council is always open to collaborating with the State Government, local businesses, and communities to develop tailored recycling solutions that meet regional needs. Through these efforts, Council envisions having a robust recycling infrastructure that not only addresses current waste management challenges but also supports economic development and environmental sustainability in the Western Downs region.

B. Implementation of the SuperGrid Telecommunication Program

Council continues to advocate for initiatives aimed at providing reliable regional internet access and strongly encourages the continued development of infrastructure to ensure fast, reliable, and affordable telecommunication access for our residents.

As highlighted in Council's [advocacy paper](#) from July 2024 on Regional Telecommunication submitted to the Australian Government. Despite Council's ongoing efforts, our region faces significant connectivity and telecommunication gaps. Council is actively researching and participating in bridging these gaps by investing in regional digital connectivity studies to understand the challenges and difficulties our communities continue to face.

Council foresees potential challenges with the SuperGrid Telecommunication Program, a large infrastructure project built on the development of high-voltage power lines and aimed at providing fibre networking in rural areas.

While providing Fibre to the Premises (FTTP) to the residents of the region is an important goal Council shares, Council foresees issues with the specialised nature of installing fibre optics cables on high-power voltage lines, raising concerns about cost-effectiveness and the need for specialised training for telecom repair and maintenance workers. Including potential challenges regarding safety and security concerns of telecommunication repair or maintenance on the power grid. Moreover, the increased frequency and intensity of storms in our region pose a risk, as power line outages could simultaneously disrupt both electricity and telecommunication services, creating vulnerabilities for our community.

Council reiterates its advocacy for investment aimed at bridging existing connectivity gaps and supports solutions that integrate with existing and trusted technologies. While Council strongly supports and will continue to work with the State Government on the development of the SuperGrid Infrastructure Blueprint for a resilient electricity network, Council also foresees potential challenges in adding the Telecommunication Program, which may complicate or slow down the delivery of the Infrastructure Blueprint.

3. Are there any important issues or gaps that these initiatives have not yet addressed?

A. Protection of agricultural land.

Council finds that important gaps remain in ensuring the continued coexistence between the agricultural sector and energy sector regarding land protection. The heritage and history of our region have been shaped by agriculture and families coming to the Western Downs for farming. Western Down's rich landscape of small family farms, large family-owned farming businesses, and commercial businesses that export products worldwide are essential actors in promoting and attracting more people and businesses to the Western Downs region and Queensland.

Council has identified a gap in the initiatives proposed in this draft renewable regulatory framework as it does not offer sufficient protection of agricultural land, especially farms used for high value cropping. Council recommends that the State Government protects Class A Agricultural Land under the regulatory framework to allow for a sustainable development of renewable energy projects. Council strongly believes in and advocates for the co-existence of both the energy and agricultural sectors, but this cannot be achieved on cropping lands. The agricultural sector depends on land and land-value stability for its continued growth and prosperity. Council believes renewable energy developers should be dissuaded from purchasing Queensland's most productive farming land, ensuring farmers' stability in land prices and the State's commitment to supporting the coexistence between both sectors.

Cropping land cannot be replaced. Once it has been alienated by large scale renewable projects, it is unlikely to ever return to its previous state. Council has experience in implementing such measures, having put in place protection measures for solar projects from being proposed on Class A Agricultural Land. This measure has not hindered our region's success, as Western Downs continues to lead in renewable project development in Queensland. Council confidently addresses this concern with the State Government, understanding the potential benefits of such a proposition at the state level and the risks of not addressing this gap. Council fears that developing renewable energy projects on Class A Agricultural Land would destabilise the agricultural industry which is the foundation to the Western Downs region's economy and continues to underpin the economy being the largest employer.

Council continues to advocate for a collaborative and sustainable development vision, as outlined in its Economic Development Strategy. Council hopes that the State Government recognises this gap and opportunity to deliver mutual benefits by modifying this framework to ensure the greatest level of protection for Class A Agricultural Land.

B. Community Benefit Sharing Program and Improved Consultations.

One gap that has been identified by Council is the need for clear guidance on Community Benefit Sharing. Council believes that one of the guiding principles of Community Benefit Sharing should focus on the fair distribution of benefits to local and regional communities, coordination of industry benefits to maximise regional collaboration, and transparency in how benefit sharing funds are received, determined, and distributed. Ensuring community ownership over decision-making and leveraging funding for greater community value are essential. This will enable investment made into legacy building and providing longer-term projects for a lasting impact in hosting communities.

Another gap is the lack of a platform for investment, whether voluntary or otherwise, to deliver strategic initiatives that address key community concerns. Council welcomes the research undertaken on the Western Downs Futures' Regional Benefit Sharing Program aiming to establish a coordinated approach to benefit sharing, facilitating effective collaboration between renewable energy companies and communities. This research considers targeting major projects that provide significant benefits across the Western Downs region, moving beyond traditional smaller-scale funding projects, and Council is excited to review and consider the outcomes once finalised.

Additionally, there is a need for more place-based initiatives to support each REZ with specific needs and requirements addressed in collaboration with the Queensland Government. Using Local Energy Partnerships Programs and other tools, it is crucial to create partnerships at local and regional levels.

The goals of the Draft Renewable Regulatory Framework on community benefits align with this approach. It is recommended that the State Government adopt this model in other REZs to quickly and effectively establish a collaborative and constructive framework for community benefits. Bringing funding together to help renewable energy developers join projects benefiting the REZ is seen as the best way to ensure legacy building and leverage private sector support for rural energy projects with community involvement.

4. Do you have any specific feedback or suggestions regarding any particular initiative?

A. Pursue the Statutory Codes of Conduct on a Federal Level.

Council has identified significant potential in the framework regarding the proposition of creating statutory Codes of Conduct. This proposal aligns well with the Council's Communities Partnering Framework, which emphasises collaboration and mutual benefit. The establishment of such codes is seen as a positive step towards ensuring that renewable energy projects are developed responsibly and sustainably, benefiting both local communities and the broader industry.

Council believes that the development of these codes by the Queensland Government will set a strong precedent for industry standards, ensuring that all stakeholders are held to high ethical and operational benchmarks. This initiative will foster greater trust and cooperation between developers and communities, ultimately facilitating smoother project implementation and uptake.

However, to maximise the effectiveness and fairness of these codes, Council recommends that the Queensland Government advocates a similar Code of Conduct be implemented at a federal level to ensure that the code is uniformly applied across all Australian states, promoting fair competition and consistency. It would also provide the federal government with the opportunity to engage in comprehensive community and industry consultations nationwide, delivering a minimum community benefit standard that can be applied equally in every state.

This strategy would enhance Queensland's attractiveness to energy companies by ensuring that considerate measures for residents are balanced with the need for rapid and efficient project development

Conclusion

Council appreciates the opportunity to contribute to the Queensland Government's Draft Renewables Regulatory Framework. This framework represents a significant step towards a sustainable and prosperous future for our region and the entire state. By enabling renewable energy development, Queensland can unlock new opportunities for regional development, economic growth, and community well-being, working towards Council's economic development strategy and our vision of building a legacy for our residents.

Council recognises the potential of this plan to enhance environmental outcomes, foster community participation, and protect valuable agricultural lands. These initiatives will not only support the transition to renewable energy but also ensure that our communities benefit from lasting economic and social gains. The focus on skills development, infrastructure investment, and transparent communication will empower our region to thrive in the evolving energy landscape.

Council commends the Queensland Government for its forward-thinking approach and commitment to renewable energy. The collaborative efforts between state and local governments, industry, and communities are crucial for the successful implementation of this plan. Council will continue to work with the State Government to build a resilient and inclusive economy that supports both current and future generations.

Council looks forward to continuing its collaboration with the Queensland Government and other partners involved in the development of renewable energy in our region, to achieve the ambitious goals of the Energy and Jobs Plan. By working together, sustainable growth and prosperity for our region can be achieved and contribute to a greener, more sustainable Queensland.

Contact Details

Please do not hesitate to contact Lidewij Koene-Sloss, Economic Development Manager via email via email lidewij.koene-sloss@wdrc.qld.gov.au or phone (07) 4679 4526 should you wish to discuss any aspect of this submission.

Appendix

1. [Western Downs Council, Economic Development Strategy 2023 – 2028](#)
2. [Western Downs Regional Council, Corporate Plan 2021 – 2026](#)
3. [QLD Energy and Jobs Plan](#)
4. [Western Downs Regional Council Communities Partnering Framework](#)
5. [Western Downs Regional Council Electricity and Energy Sector Plan Discussion Paper](#)
6. [Western Downs Regional Council Clean Economy Jobs Bill 2024](#)
7. [QFF Queensland Renewable Energy Landholder Toolkit](#)
8. [Western Downs Regional Council Regional Telecommunications Review Submission](#)