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To Whom It May Concern,

Re: Draft Guideline on Community Benefits for Renewable Energy Projects - Consultation Paper

The Curtin Institute of Energy Transition is pleased to provide our submission to the *Consultation Paper* (the Guideline). It is positive to see the Guideline demonstrate the WA Government's commitment to a community benefit sharing program. However, we believe some elements could be further strengthened by incorporating more specific details to ensure the Guideline is easy to action, targeted and aligned with best practices.

For example, the current recommended community benefit payments offer a wide range for wind and solar projects. We feel this could be open to exploitation by some developers who may opt for the lowest value in each circumstance, which may not be in the best interests of communities.

The Guideline also excludes details on payments for neighbours and host landholders which appears an important omission, particularly as there are multiple agreements being negotiated at this time. The State Government could increase transparency and trust by establishing clearer guidelines for benefit sharing contributions, specifically for landholders and neighbours. This was reinforced in a recent article where the Head of Squadron Energy suggested:

I think there would be real value in having a regulated, transparent national framework around the benefits that are paid to hosts, into neighbours, because if that's consistent and transparent, then there really is no need for some of these confidential arrangements to be entered into.

Rob Wheals (Head of Squadron¹)

It is also important to ensure details of payments for transmission infrastructure and battery energy storage system (BESS) projects are published, as they do not appear to exist on any WA Government website.

Finally, while there is acknowledgement of the First Nations Clean Energy Strategy that sets out the principles and actions to ensure Aboriginal People can participate in WA's energy transition, it would be helpful to highlight in more detail, ways First Nations rights can be acknowledged and the different ways that they may share in benefits. These can range from equity ownership to local employment and training, among others.

We also provide some additional suggestions and recommendations for your consideration where we feel they enhance the current draft Guideline.

Yours sincerely



Professor Peta Ashworth OAM

Director, Curtin Institute for Energy Transition

Fundamental considerations

While the Guideline is clearly focused on community benefits, the draft lacks a definition of what constitutes community. It would be helpful if community was defined to better facilitate understanding and the application of the Guideline.

We recommend that a definition of community, and what it encompasses, be included in the final document.

There is also reference to the application of the Guideline being more suited to communities in the South West. This is unhelpful, making its overall application across the state more ambiguous.

We recommend PoweringWA identify within the Guideline if there are principles that are not suitable for application in wider Western Australia (WA) and provide reasons for why variations may need to be considered.

As mentioned, the Guideline does not address issues of payments to host landholders and near neighbours, nor transmission infrastructure and battery energy systems (BESS). This appears to be an oversight and should be addressed. To assist, we have provided examples of how these have been treated in other states, particularly in light of community opposition to projects and ways to overcome them.

We recommend the WA government include guidelines for landholders, near neighbours, transmission and BESS as a matter of priority.

It is not clear how the Guideline will be enforced. From the literature, it has been suggested that a regulated community benefit sharing framework (that also details what hosts and neighbours are paid) can provide consistency and transparency². This would also make confidentiality clauses obsolete and build a level playing field for all stakeholders.

We recommend PoweringWA consider how they will enforce the final community benefit payment scheme through regulation.

A key challenge for local governments has been the ability to have the necessary capability within regional areas to oversee the large number of development applications for new projects.

We recommend PoweringWA consider subsidising planners to sit within local government to help build capacity as seen in NSW³.

There are also other considerations for community benefits. These can include setting benchmark amounts for purchasing from local businesses, local training and employment, as well as supply of housing and related infrastructure that can be negotiated with host communities.

We recommend PoweringWA provides greater direction for local content and employment considerations, and detail examples around such initiatives for host communities.

Response to Consultation Paper

We address the various sections within the document more broadly below.

Types of community benefits

Some examples of case studies which demonstrate the types of benefits are offered below:

Local employment neighbourhood benefit program

- Karadoc Solar Farm (Victoria): Hired a contractor to develop an employment and training program based on three principles – hiring local workforce, providing jobs for people facing barriers to employment and developing young people’s skills for careers⁴.
- Octopus Investments Darlington Point Solar (NSW): Delivered various local benefits including employment of 125 locals in construction of solar farm, which is 10% of the town’s total population, developing rooftop solar projects for housing and the local school, financial support for renovation of local housing to be rented to workers during construction⁵.

Employee volunteerism

- Pacific Hydro (Victoria): Encouraged their staff to do weekend bush regeneration and maintenance work at the viewing platform at a public reserve⁴.

Energy infrastructure

- Hepburn Energy Impact Fund (Victoria): Supports several initiatives such as the EV charging Network-with⁴ new charging stations, community energy and bulk buy opportunities for community based solar, battery and energy efficiency projects⁶.

Co-ownership

- Denmark: Wind developers must offer up to 20% shares in a project to individual households within 4.5km radius of site⁷ as co-ownership.
- Scotland: A joint venture between local residents in Fintry and a wind farm developer, the community owns 1/15 of overall wind farm and profits generated⁸.
- Australia: Cowra Biomass project in NSW⁹, and Coonooer Bridge Wind Farm in Victoria¹⁰.

Principles of community benefits

We recommend elevating **transparency** as the underlying principle for the Guideline. This is consistent with the literature and should help to circumvent many issues that have emerged in other states. It is also worth ensuring that benefit sharing is treated as a standard practice^{5,11}, and that it is seen to be collaborative effort between the developer and the community^{9,12}. Making community benefit sharing standard practice helps align local projects with global best practices such as the European Union’s Renewable Energy Directive (RED II)¹². Collaboration between the developer and the community fosters trust, aligning efforts across stakeholders and supports coordinated, inclusive and legacy-focused outcomes.

Benefit value guidelines

The current benefit sharing ranges are disproportionately broad, wind project payments vary by a factor of three (\$500–\$1500 per megawatt per annum), while solar payments are up to five times the minimum (\$150–\$800). Such broad ranges often create inconsistent legacy outcomes. There is also no reference to Battery Energy Storage Systems (BESS).

These minimum payments for both wind and solar projects lack align with other regions in Australia. For example:

- In NSW the payments for wind projects are \$1,050 per megawatt per annum, while Tasmania has a range of \$800-\$1,800 per megawatt per annum¹³.

- The minimum of \$150 per megawatt per annum for solar projects lags the \$850 per megawatt per annum for NSW¹², although is consistent with Victoria – a state that is suffering many social licence to operate issues.
- Percentage-based benefit sharing programs have been shown to also lead to more consistent legacy outcomes. For example, the Banana Shire in Queensland has adopted a percentage-based contribution model, requiring major projects with a capital value exceeding \$50 million to contribute 0.7% of their total capital value towards housing, or \$650,000 (whichever is greater)¹⁴.

Without stronger benchmarks it can be difficult for communities to evaluate whether community benefits being offered by developers are appropriate¹⁵. The NSW standard does appear to be the most appropriate.

We recommend that clearer benchmarks with a more limited range be provided for benefit sharing contributions, as well as including a separate recommendation for standalone BESS projects.

Governance structures

The Guideline suggests three models: Local Government Administered, Community Trust Fund and Local Government-Led Community Trust Fund. Providing example pros and cons of each of these models will help communities to decide which model to use, or whether there is a need to develop an alternative model better suited to their specific context.

We recommend providing pros and cons for the suggested models and consider alternative models such as cooperatives and limited partnerships, with their respective pros and cons.

We also recommend involving the community into the governance and management structure and ensuring PoweringWA have a dedicated team to support councils.

Reporting and review

The Guideline suggests that evaluation outcomes be monitored and reflexive. However, resources will be required to do this at the local government level. To build transparency additional requirements may include:

- Any local council that is a party to a community benefit agreement must keep a copy of the agreement on its website and make it available for inspection, as proposed in Queensland¹⁵
- PoweringWA developing a public register of community benefit sharing programs (with details of each project such as governance structures, the amount of funding, mechanisms and the consultation that was undertaken to identify and develop each)
- All reporting should include comprehensive disclosure of decisions and outcomes of how the benefits are shared.

Additional considerations

Landholder payments

Payments to landholders can fall into two categories:

- (1) Payments for land access and project involvement, and
- (2) Infrastructure-related landholder contributions. (The breakdown of landholder payments is shown in Figure 1.)

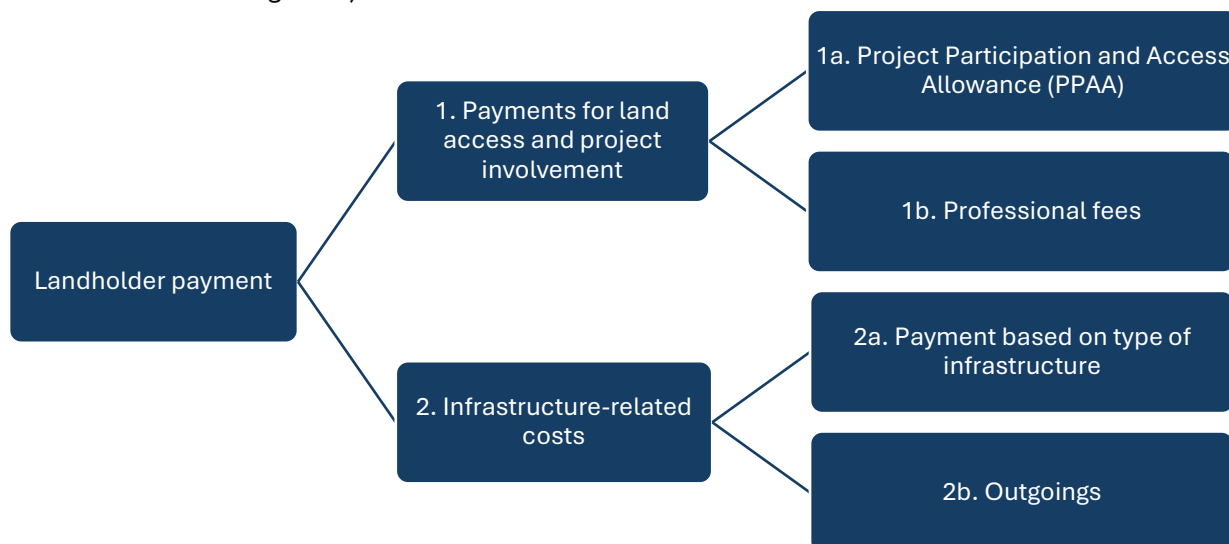


Figure 1: Breakdown of landholder payments

Payments for land access and project involvement

The payment for land access and project involvement can be divided into Project Participation and Access Allowance (PPAA), and professional fees to cover legal, tax, financial, valuation, and insurance expenses. Table 1 provides examples of PPAA payments from Powerlink, the Australian Energy Infrastructure Commissioner (AIEC) and Western Renewable Link (WRL).

Table 1: Examples of PPAA payments for landholders.

Year	Organisation	PPAA Payment
2023	Powerlink	\$5,000 for each 12-month period (or part thereof) ¹⁶
2025	AIEC	\$1,000-\$10,000 per title ¹⁷
2025	WRL	\$20,000 for first five days of access, with \$2,000 per day for additional access, up to a maximum of \$50,000 ¹⁸

Transmission infrastructure

VicGrid last week [June 2025] outlined a new proposal to make offers of up to \$40,000 to “near neighbours” of the transmission projects in an effort to soothe anger in the local communities.¹⁹

Transmission infrastructure is the backbone of a decarbonised energy system. Without robust transmission lines being deployed, it will slow down the energy transition. Again, lessons learned from the eastern states show that neighbours within 1km of transmission infrastructure should be given proportional payments.

WRL is offering \$20,000 one-off payment or \$40,000 payment for dwellings within 400m of transmission infrastructure, depending on their proximity²⁰. Powerlink is also offering neighbours within 1 km radius a proportional benefit payment ²¹.

We recommend neighbours within 1km of transmission infrastructure should receive proportional payments. Besides payments to landholders and neighbours, transmission projects also support the local community ²².

Professional fees

WRL offer upfront landholder professional fees payment of \$10,000 to cover legal, tax, financial, valuation, insurance²³.

We recommend PPAA of \$20,000 for the first five days and an additional \$1,000 per day for additional access and professional fees of at least \$5,000.

Neighbour payments

Neighbour payments for wind projects are most often based on distance (km) to wind turbines as shown in Table 2. Loss of visual amenity is an additional payment of \$250 per visible cell in a specified area that contains one or more turbines.

The payment is to recognise that near neighbours “often have similar experiences to those hosting infrastructure directly” but never get any benefit from it.²⁴ [AusNet]

Table 2: Neighbour payments for wind projects

Year	Organisation	Payments per turbine per year				
		1-1.5km	1.5-2km	2-2.5km	2.5-3km	3-3.5km
2025	Sunny Corner Wind Farm ²⁵	\$6,000	\$4,500	\$3,500		
2025	The Pines Wind Farm ²⁶	\$5,000	\$5,000	\$3,000	\$2,000	\$1,000

Benefits for neighbours of ENGIE’s The Plains Renewables Park (solar and wind projects) include construction and operation payments to neighbours in a radius of 10km as shown in Table 3.

Table 3: ENGIE’s The Plains Renewables Park neighbour benefits

Payment	All	Within 5km	Within 8km	Within 10km
Sign-on payment	\$2,000			
Construction payment		\$15,000	\$10,000	\$5,000
Operation payment		\$15,000 + \$1,000 per turbine	\$10,000 + \$500 per turbine	\$5,000 + 250 per turbine

Neighbour benefits for wind projects should be based on distance from wind turbines, include loss of visual amenity payments and maintain the required setback distances of WA government. Payments should be for ranges from 1 km to 3.5 km as shown in The Pines Wind Farm example²⁴.

Footnote references

¹ There's a lot more resistance:" Forrest's renewables chief says old way of community consulting is dead | RenewEconomy

² Kerr, S., Johnson, K. and Weir, S., 2017. Understanding community benefit payments from renewable energy development. *Energy Policy*, 105, pp.202-211.

³ <https://www.energyco.nsw.gov.au/news/multi-million-dollar-boost-councils-help-deliver-nsw-renewable-energy-future>

⁴ Clean Energy Council-[guide-to-benefit sharing-options-for-renewable-energy-projects.pdf](#)

⁵ https://www.theenergycharter.com.au/wp-content/uploads/2023/05/The-Energy-Charter_Better-Practice-Social-Licence-2023_SUMMARY.pdf

⁶ https://www.re-alliance.org.au/building_stronger_communities_cbf

⁷ https://caneurope.org/content/uploads/2025/04/CANE-April-2025_Community-Engagement-and-Benefit-Sharing.pdf

⁸ Shared Ownership in Scotland. Opening up citizen participation in Renewable Energy. [SharedOwnershipReportWeb-1.pdf](#)

⁹ Community Engagement and Benefit Sharing in Renewable Energy Development A Guide for Renewable Energy Developers- https://www.planning.vic.gov.au/__data/assets/pdf_file/0025/621970/community-engagement-and-benefit-sharing-in-renewable-energy-development.pdf%20

¹⁰ Renewable Energy Development in Tasmania A Guideline for Community Engagement, Benefit Sharing and Local Procurement [Guideline_for_Community_Engagement,_Benefit_Sharing_and_Local_Procurement.pdf](#)

¹¹ Department of Planning, Housing and Infrastructure dphi.nsw.gov.au-
<https://www.planning.nsw.gov.au/sites/default/files/2024-11/benefit-sharing-guideline.pdf>

¹² [RED II, energy communities and the FEDECOM project | BUILD UP](#)

¹³

https://recfit.tas.gov.au/__data/assets/pdf_file/0010/399205/Guideline_for_Community_Engagement,_Benefit_Sharing_and_Local_Procurement.pdf

¹⁴ https://www.planning.qld.gov.au/__data/assets/pdf_file/0017/102275/community-benefit-agreements-guidance.pdf

¹⁵ Comeau, L., Gresh, E. and Vaillancourt, L.C., 2022. Why Do Wind Energy Projects Fail. *Conservation Council of New Brunswick, Fredericton, New Brunswick*. <https://www.conservationcouncil.ca/wp-content/uploads/2022/11/Report-Why-do-renewable-energy-projects-fail-3.pdf>

¹⁶ https://www.powerlink.com.au/sites/default/files/2025-05/Project%20Participation%20and%20Access%20Allowance_0.pdf

¹⁷ <https://www.aeic.gov.au/observations-and-recommendations/chapter-1-host-landowner-negotiations>

¹⁸ <https://www.westernrenewableslink.com.au/assets/resources/Landholder-Guide-Option-for-Easement-process-and-compensation.pdf>

¹⁹ <https://reneweconomy.com.au/key-transmission-link-delayed-by-two-years-in-new-blow-to-wind-and-solar-projects/>

²⁰ <https://www.ausnetservices.com.au/news/neighbouring-landholders-to-receive-financial-benefits-from-new-wrl-program>

²¹ <https://www.powerlink.com.au/sites/default/files/2023-05/SuperGrid-Landholder-Payment-Framework.pdf>

²² <https://www.junee.network/grants/humelinks-community-investment-and-benefits-program-july-2025/>

²³ <https://www.thepineswindfarm.com.au/neighbours>

²⁴ <https://reneweconomy.com.au/network-offers-big-near-neighbour-payments-to-soothe-anger-over-renewables-transmission-line/>

²⁵ <https://sunnycornerwindfarm.com.au/neighbour/>

²⁶ <https://www.thepineswindfarm.com.au/neighbours>