

28 November 2016

Erica van den Honert  
Director, Planning Services, Business Systems  
GPO Box 39  
SYDNEY NSW 2001

By email: [EIAproject@planning.nsw.gov.au](mailto:EIAproject@planning.nsw.gov.au)

Dear Ms van den Honert,

**Re. NSW Department of Planning and Environment EIA Improvement Project Discussion Paper**

CWP Renewables welcomes the opportunity to make a submission to the Department of Planning and Environment (the Department) regarding the EIA Improvement Project Discussion Paper.

**CWP Renewables background**

CWP Renewables has grown from a joint-venture between two leading renewable energy developers, Continental Wind Partners and the Wind Prospect Group, with over 20 years of renewable energy development experience around the world. CWP Renewables was founded in 2008 with a focus to develop wind farm projects in NSW, and has since expanded to include solar PV projects in NSW, Queensland and South Australia.

CWP Renewables is a full-scope renewable energy developer with skills and experience ranging from site identification and wind monitoring, through to financing, construction and operations management. Leading team members who delivered projects at Continental Wind Partners and the Wind Prospect Group were recruited to form CWP Renewables. The team, based in Newcastle (NSW), Adelaide (SA) Canberra (ACT) along with two site offices at Boco Rock Wind Farm (NSW) and Taralga Wind Farm (NSW) has delivered over 2,400 MW in total of planning approvals and nearly 1,000 MW constructed to date, with construction at Sapphire Wind Farm (NSW) to commence in late 2016.

**The potential of wind energy development in NSW**

With renewed certainty in the Renewable Energy Target (RET), and renewed vigour in investment in renewable energy, NSW has an opportunity to capture a significant portion of the investment that will be needed to meet the target.

The Clean Energy Council predicts that in order to deliver the 33,000 GWh RET, approximately 6000 MW of new renewable energy capacity will need to be built by 2020. Between 30 and 50 major utility

projects are likely to be built in the next five years to meet the target, along with hundreds of medium-scale solar projects from commercial and industrial businesses<sup>1</sup>.

## **Submission on the EIA Improvement Project Discussion Paper**

### *Initiative 6: Provide greater certainty on EIA timeframes*

CWP Renewables supports greater certainty of environmental impact assessment timeframes and better coordination between Government agencies, the proponent and the community. Policy, pathway and timing certainty is crucial for project stakeholders, including investors into renewable energy projects in NSW. Delays, policy changes and shifting goalposts disadvantage both the proponent and the community, and CWP Renewables is heartened that the Department of Planning and Environment are aiming to provide greater certainty within the planning process.

### *Initiative 8: Project change processes following approval*

CWP Renewables supports this initiative. Modifications are an important issue for wind farms in particular, where technology changes and long development timeframes have in some cases resulted in tip height restrictions which make approvals unsuitable for modern turbines. The Department of Planning and Environment should consider a process whereby wind farms that can reduce amenity impact (for example by modifying the layout to use fewer, larger turbines) can navigate a simplified modification approvals process. This will be an important step in ensuring the timely delivery of projects in meeting the federal Renewable Energy Target, the objectives of the NSW Climate Change Policy Framework and other procurement processes.

### *Planning Fees*

In order to facilitate regional investment through clean energy projects, we suggest the Department of Planning and Environment also undertake a review of the planning fees for wind farm developments. Planning fees should reflect the resources required to assess and determine projects, but should not place a financial burden on projects such that development progress is discouraged. A review of planning fees to ensure they better reflect the NSW Government's desire to take advantage of the current opportunities to grow the renewable energy industry, and ensure that NSW captures a significant portion of the investment that wind farms are driving in Australia.

In conclusion, we appreciate the opportunity to provide feedback in relation to the Environmental Impact Assessment Improvement Project. We hope that our suggestions contribute to a robust and balanced assessment process which will stimulate economic growth in NSW and drive the cost of electricity down across the state.

Yours sincerely,



**Edward Mounsey**  
Chief Operating Officer  
CWP Renewables Pty Ltd

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<sup>1</sup> Clean Energy Council (2015) A bipartisan renewable energy target: the huge opportunities for Australia.