

Appendix B

Community Relations Plan

Goorambat East Solar Farm COMMUNITY RELATIONS PLAN



August 2019

EXTERNAL DOCUMENT

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Purpose

This Community Relations Plan (CRP) was developed during the development phase by Kristina Yan, project manager, with oversight from the Community Relations Manager in 2019.

This document identifies the community relations approach and objectives for the Goorambat East Solar Farm (GESF) and surrounding communities. GESF was previously considered the eastern front of the Goorambat Stewarton Solar Farm and is now a stand-alone financially viable 250MW solar power project with an independent connection point. This document outlines the overall framework across the phases of the project lifecycle (from development to construction then operations) and proposed plans. It also provides a summary of the key stakeholders being the landholders, neighbours, local community and local government.

Neoen understands that the success of the Goorambat East Solar Farm is dependent to a large extent on the development of genuine, open and ongoing relationships with key stakeholders and the local community. We recognise the importance of ensuring a “no surprises” dynamic with the local community and are committed to developing and nurturing long-term relationships between our team and the various project stakeholders.

This template was developed in accordance with the best practice guidelines from the ACT and VRET auction schemes in order to position this project well for any appropriate government or corporate tenders.

The CRP is a key element of the Community Relations Toolkit depicted in the following figure.

Table 1: Community Relations Toolkit by Project Stage



Distribution

This is an external CRP for public access and part of the submission of the planning permit.

Responsibility

Over the many years of the project development and lifecycle, who is responsible for and engaged in the deployment of the CRP will change. This table below outlines the movement in responsibility over the project lifecycle.

Table 2: Responsibility for CRP

	Project Stages	Proposed Timing	Responsibility for CRP
Stage 1	Site selection	Q3 2018	Development Project Manager Matthew Parton
Stage 2	Feasibility	Q4 2018	Development Project Manager Kristen Roy
Stage 3	Planning and approvals	Q1-Q2 2019	Development Project Manager Kristina Yan
Stage 4	Post DA lodgement	Q3 2019	Development Project Manager Kristina Yan
Stage 5	Pre-construction	Q4 2019	Development Project Manager Kristina Yan
Stage 6	Construction	TBD	As per Construction Environmental Management Plan (CEMP)
Stage 7	Commissioning and Operation	TBD	As per Operational Environmental Management Plan (OEMP)
Stage 8	Decommissioning	TBD	As per Decommissioning Environmental Management Plan (DEMP)

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1. Introduction

1.1. Our approach

Stakeholder and community relations are led by Neoen's project managers with support from a community relations specialist. We consider it important that trusting relationships are developed between the people on the ground who know the project the best, and the stakeholders that are part of and connected to their region and local community.

Neoen have a vertically integrated business model, meaning that we 'develop to own' our projects. This model is unusual in the industry, affording us a clear advantage over our competitors in respect to community relations. As asset owners we aim to establish and nurture relationships, and embrace partnerships and innovation, confident that we will be there to see long term projects and benefits bear fruit. Due to the rural nature of the community, our overall approach to consultation for the Goorambat East Solar Farm will be open, relaxed, flexible, informal and responsive.

1.2. Our values

Neoen has a clear set of values and beliefs that underpin and guide our work:

Integrity

- We operate with integrity, whatever we do, whenever and wherever we do it. We work with partners who abide by the same rules. Our ethical approach is an asset in our worldwide operations.

Commitment

- We uphold all our commitments, internal and external. We believe in hard work and take pleasure in seeing a good job well done.

Audacity

- We believe we can become a world leader in renewable energy. We have the audacity to operate globally, imagining, designing and implementing competitive, effective energy solutions.

Esprit de corps

- We are loyal to each other and form a close-knit team. We are proud of our company, our goals and our accomplishments.

1.3. Industry Best Practice

Our approach to engaging stakeholders is informed by the Public Participation Spectrum developed by the International Association of Public Participation (IAP2) and widely adopted as a framework for

structuring consultation by the renewables industry¹. The approaches and spectrum are represented in the following table:

Table 3: Spectrums of Engagement

	Inform	Consult	Involve	Collaborate	Empower
Community engagement objective	Provide balanced and objective information assist the community in understanding all aspects of the project, including possible problems/issues	Obtain feedback from the community on plans, options and/or decisions	Work directly with the community throughout all stages of the project ensure community concerns and aspirations are consistently understood and considered	Partner with the community in each aspect of planning, development and decision-making, including the development of alternatives and the identification of the preferred solution	Community to lead the development of the renewable energy project place decision-making in the hands of the community
Promise to community	Keep the community informed through all stages of development, including issues and delays	Keep the community informed listen and acknowledge suggestions and concerns provide feedback on how input influenced the decision	Work with the community to ensure concerns and aspirations are directly reflected in the alternatives developed provide feedback on how input influenced the decision	Look to the community for direct advice and innovation in formulating solutions incorporate advice and recommendations into decisions to the maximum extent possible	Implement what the community decides
Community engagement outcomes	Securing a good site to install the renewable energy facility gaining planning permission meeting compliance regulations	Minimising objections effectively managing complaints good stakeholder relations a level of community awareness and trust in the project	Long-term broad local social acceptance and knowledge of the project strengthened local relationships and trust local advocates for renewable energy	Broad community participation, support and awareness some sense of local ownership greater community benefit and strong local relationships and trust timely development and easier planning approval some sharing of benefits beyond investors	Benefit sharing program tailored to the local context harness the skills and capital of the community upskill community members to manage the project largely community owned and controlled

¹ Lane, T. and J. Hicks (2017) *Community Engagement and Benefit Sharing in Renewable Energy Development: A Guide for Applicants to the Victorian Renewable Energy Target Auction*. Department of Environment, Land, Water and Planning, Victorian Government, Melbourne.

This CRP aims to move our engagement activities and benefit sharing approach along the spectrum listed above so that across our project portfolio we are:

- **Involving** the community in the development, construction and operation of the solar farm
- **Collaborating** with the community to ensure that local advice and insights are shaping our approach to engagement and benefit sharing
- **Empowering** the community to shape key elements of the project, such as co-designing the long-term framework of the benefit-sharing program

1.4. Emerging Trends

The table in the prior section shows that differing levels of participation are legitimate, depending on the goals, timeframes, resources and levels of interest/concern in the decision to be made. At all levels of engagement, it is fundamental to define the promise and ensure it is clearly understood by both the decision makers and the stakeholders to be engaged. The following figure² shows the emergent key elements of best practice as at 2018.



1.5. Community Relations Objectives

- Foster a transparent and open approach to the development of Goorambat East Solar Farm and ensure 'no surprises' for the local community
- Keep the community and stakeholders informed about Goorambat East Solar Farm through the provision of accurate and factual project information
- Identify and address community and stakeholder concerns and maintain transparency in the project design, implementation and ongoing operations
- Involve stakeholders and community regarding key decisions

² Lane, T., Wood, E. Hall, N., Webb, A. and Mey, F. *Enhancing Social Outcomes from Wind Development in Australia: Evaluating Community Engagement and Benefit Sharing*. Clean Energy Council, Melbourne

- Identify opportunities for local business involvement and local employment in the construction and operations of Goorambat East Solar Farm
- Identify opportunities for Indigenous participation and employment in the construction and operations of Goorambat East Solar Farm and where appropriate develop an Indigenous Participation Plan
- Develop and deliver benefit sharing mechanisms in consultation with the community, and in partnership with local stakeholders where possible
- Develop long-term relationships and partnerships with community and stakeholders.

1.6. Community Relations and Development Framework

An eight-phased approach will guide the implementation of community relations strategy in alignment with each of the project stages. Key project activities and milestones are outlined in the table below.

Table 5: Project Phasing & Milestones



2. Project Context

2.1. Context narrative

Neoen's development opportunities in the Goorambat region are shown on the website www.goorambatsolarfarm.com.au. The Goorambat Stewarton Solar Farms were envisioned by a consortium of landholders who collectively prepared suitable land for solar development in the Goorambat, Broken Creek, Major Plains and Stewarton districts in Victoria. Two key areas were identified to have potential for a solar farm – the Eastern Front (south of the Goorambat Township to the east of Broken Creek) and the Western Front (in the Stewarton and Major Plains regions to the west of Broken Creek).

After solar farm feasibility studies, an initial community information day, consultation with the Council, DELWP and the GBCMA it was determined that the opportunity in the east – the Goorambat East Solar Farm – would be financially viable as a stand-alone project. Further development activities for the Western Front would continue but are expected to require 6-12 months of further studies.

Goorambat East Solar Farm is presented to the Benalla Rural City Council as a separate planning permit with the potential to proceed through to construction on its own merits.

The purpose for this document, on a section of this consortium land, is the Goorambat East Solar Farm (up to 250MWac) as shown on site map in section 2.3.

2.2. Background and development to date

Community members contacted Neoen in 2018 via a community leader and involved landholder – Wayne Spinks. A group of 11 landowners together negotiated the details of the Option documents required be secured for development of the Solar Farms.

The first community Drop-in Session was held in March 2019 at Goorambat Hall. At this session the Goorambat Stewarton Solar Farms were proposed to the community. The overall response from the community was supportive.

As development activities continued a Council meeting was held with attendees from DELWP and the Goulburn Broken CMA. Neoen decided as a result of discussions in the meeting to proceed with the stand-alone Goorambat East Solar Farm project first while more time could be spent developing the other land. Also contributing to this decision was the finding from the initial grid connection studies which helped to determine financial viability of the Goorambat East Solar Farm.

The Community Information Session held in August 2019 at Goorambat Football & Netball Club was required to explain these changes to the project and announce the imminent submission of Goorambat East Solar Farm proposal to Council.

2.3. Site location



Other projects located nearby:

Winton Solar Farm (85 MW) is located to the north west of Winton

Glenrowan West (140 MW) is located 2km south west of Glenrowan

Goorambat Solar Farm (75 MW) is located in Goorambat, adjacent to Gooramabat East Solar Farm

2.4. Community attitudes and local politics

2.4.1. Town & region

Goorambat is located 229 kilometres north of Melbourne. The 2016 census says Goorambat and the surrounding area has a population of 297. It is located in the Rural City of Benalla council area (population 14,000) and in the state electorate of Euroa and Federal electorate of Indi. The closest towns are Benalla (16kms away, population 9,200) and Wangaratta (50kms away, population 28,000). The major industries are agriculture, wheat, sheep, beef cattle (several major Wagyu beef producers involved in export of embryos). There are almost annual bushfire warnings for Goorambat area and intermittent reports of loss of buildings.

2.4.2. Local Government

[Benalla Rural City](#) has a diverse local economy including manufacturing, community services, retail, and agriculture. The largest employer is the manufacturing industry which includes Thales Australia (defence), D & R Henderson Pty Ltd (timber products), Schneider Electric (Australia) Pty Ltd (energy management and automation), and a wide variety of smaller manufacturing businesses.

[Current Councillors](#) are

- Scott Upston, Mayor
- Peter Davis, Deputy Mayor
- Don Firth
- Barbara Alexander AO
- Danny Claridge
- Bernie Hearn
- Willie van Wersce

2.4.3. State Government

Goorambat is located in the north east corner of the Euroa electorate. Euroa is a rural electorate, covering 11,635 square kms north east of Melbourne.

Major industries in the electorate include agriculture, tourism, timber production, wine production and fruit growing. The district also includes the Puckapunyal military base.

The current sitting member is the Deputy Leader of the Nationals (who are in Coalition with the Liberal Party in opposition), Steph Ryan, who was first elected in 2014. She is also the Shadow Minister for Training, Skills and Apprenticeships. Euroa is considered a safe seat for the Nationals and Ryan has a margin of 14.5 percent.

Ryan is 32 years old. She was born and grew up in the region and worked as a regional newspaper journalist and political adviser before being elected to Parliament.

2.4.4. Federal Government

Goorambat is in the Federal electorate of Indi, which is currently held by Independent MP, Helen Haines by a margin of 3%. Indi covers an area of 29,187 km² in the north east of Victoria, along the Murray River state border with New South Wales. The electorate includes nine local council areas and the electoral

office is in Wangaratta. This seat was traditionally Liberal but was taken by Independent Cathy McGowan, in 2013 who then successfully defended it at the 2016 election. The 2019 election saw a transfer of power to her independent successor, chosen by the community grassroots 'Voices for Indi' movement.

Helen Haines has lived and worked as a nurse, midwife, health administrator and medical researcher in North East Victoria (Chiltern, Rutherglen and Wangaratta) for over 30 years. She is a board member of St Catherine's Aged Care in Wangaratta and Indigo Power Community Energy Retailer. She is a former director of the Hume Medicare Local, former director, chair and now life member of Ovens and King (now Gateway) Community Health Service, and former board member and chair of Wangaratta Unlimited – Economic Advisory Board to the Rural City of Wangaratta.

2.4.5. Opposition Groups

While individuals have discussed concerns about the project to member of the Neoen team (mostly in person at organised community events) there have not been any formalised groups who are in opposition to the project.

2.4.6. Renewable Energy Supporters

Benalla Sustainable Future Group (www.bsfg.org.au)

- Established in 2010, its concerns are environmental sustainability and the lack of action on climate change.
- The primary purpose of the Benalla Sustainable Future Group is to protect and enhance the natural and built environment by promoting sustainable living practices and development within the Benalla region so that the needs of the present can be met without compromising the resources available to future generations.

Renewable Energy Benalla

- Renewable Energy Benalla (REB) is an action group of Benalla Sustainable Future Group (BSFG). It comprises self-nominated interested members of the community who attended the Benalla Renewable Energy Future Forum in October 2016. The objectives of Renewable Energy Benalla, working in collaboration with the community and relevant organisations, includes: Achieve a significant increase in local renewable energy generation

2.4.7. Business Groups

Hume Business Champions Network

- Association of ten Councils across north east Victoria, whose aim is to encourage business to share and apply practical steps to save energy.
- The Network refers to Sustainability Victoria (State Government body to facilitate and promote environmental sustainability in the use of resources.)

Benalla Business Network:

- The Benalla Business Network promotes, supports and brings businesses in the district of Benalla together through leadership, advocacy, networking opportunities. It has an alliance with the Victorian Chamber of Commerce and Industry.
- The Benalla Business Network acts as a conduit between local business and council.

Victorian Farmers Federation:

- The Victorian Farmers Federation is an active, powerful lobby group dedicated to the interests of farmers and making a difference to communities.
- Victorian Farmers Federation President, David Jochinke, has urged proper consultation over new planning regulations, governing the development of solar farms.

Sun Real

- SUN REAL is a major provider of off grid, hybrid and grid connect power systems in the North East of Victoria. Accredited by the Clean Energy Council.

2.4.8. Local Media**Benalla Ensign**

- Local weekly Benalla paper, comes out every Wednesday <https://www.benallaensign.com.au/>

2.5. Community Overview

The Goorambat community is adjacent to the proposed Goorambat East Solar Farm. According to the Australian Bureau of Statistics, the following overview is representative of the area.

Table 6: Total Population Study Map

Demographics (ABS 2016)	Estimated Population	350
	Town Population	297 (Goorambat)
	Median Age	40
	Median Weekly household Income	\$1,545
	Total Dwellings	127
Education	Bachelor Degree level and above	16%
	Advanced Diploma and Diploma level	22%
	Certificate level III	51%
	Year 12	11%
Industry	Agriculture Forestry and Fishing	25%
	Healthcare and Social Assistance	12%
	Manufacturing	11%
	Other	51%
Home Ownership	Owned outright	53%
	Owned with a mortgage	25%
	Rented	12%

3. Community Relations Strategy

3.1. Needs-based approach

Each key stakeholder has a different need across each phase of the development cycle. To address this nuance, a needs-based approach is described for each of the key stakeholders to this project in the following table.

Table 7: Key stakeholders

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
Host Landowners	Residents who are hosting solar panels on their land.	Ongoing communication and discussions as project progresses. Contribution to the project's progress, ability to provide local knowledge, advice and input. Involvement in development and delivery of community benefit-sharing scheme	Engagement techniques: One-on-one meetings Landowner updates & dinners Letterbox drops Invitations & involvement in community events
Near neighbours (500m)	Residents within a 500m radius of the project site have the potential to be affected by the visual impact of the solar farm, the noise and heavy vehicle traffic associated with the construction phase.	To create and maintain a close connection with neighbours that live within a 500m radius of the solar farm. To keep neighbours informed about the project from early in the project planning phase and provide opportunities to raise issues and provide feedback. To ensure that neighbours share the benefits of the project.	Benefit Sharing: Residents within 500m of solar panels will be provided a construction disruption payment as described in Section 6. Engagement techniques: One-on-one engagement Letterbox drop Project Updates Community Open Days Invitation to be provided a private photomontage
Neighbourhood (3725 postcode)	The local community people living within the Goorambat	To keep neighbours informed about the project from early in the	Engagement techniques:

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
	township adjacent to the project.	project planning phase, and provide opportunities to raise issues and provide feedback	Letterbox drop Project Updates Community Open Days Invitation to events
Council	We will work with the Benalla Rural City Council to shape the Community Engagement Strategy and Benefit Sharing Program.	To ensure a positive and collaborative relationship with the LGA that can support the long-term goals of the local community.	Engagement techniques: Project Updates One-on-one engagement Community Open Day Pre-DA meeting
State MP's	Steph Ryan (Euroa)	To ensure local member is updated on the project and its progress	Project update in person by Head of Development
Federal MP's	Helena Haines (Indi)	To ensure the local member is updated on the project and its progress	Project update in person by Head of Development
Local community	Goorambat Progressive Community Group	To ensure the strong community groups are supported into the future by local investment.	Involvement in Community Open Days 1. March 20 th 2019 2. August 10 th 2019 Feedback survey Co-design of Community Benefit Program
CFA	Local volunteers representing the Country Fire Authority	To ensure project activities abide by safety and regulatory requirements	Provide indicative design plans and updates on the project to prepare for local fire and emergency safety requirements
Schools, TAFEs and Universities	Broken Creek Primary School Dookie College	To ensure organisations are updated on education and vocational opportunities associated with the project.	Information and project updates provided and invitation to future networking engagement.

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
Business groups / industry stakeholders	We will seek to engage and collaborate with local businesses and business networks around what opportunities may be available such as sourcing for the solar farm development.	To ensure Neoen is creating opportunities for local businesses to participate in the development of local renewable energy projects.	Pre-construction local business expression on interest Invitation to Local Employment & Supplier Networking session
Aboriginal community	We will seek to engage and understand what elements of the project are culturally relevant and/or sensitive. Chris Thorne has been contacted to help identify key contacts.	Engaging with local Aboriginal groups beyond planning requirements, such as Cultural Heritage Management Plans.	Invitation to co-design Indigenous Participation Plan
Solar farm opponents	We will seek to identify those issues that are of concern to local solar farm opponents.	To be accessible, help to address concerns proactively, and to have a best practice complaints system in place.	Complaints process implemented and transparent.
Advocacy groups	Benalla Sustainable Future Group Renewable Energy Benalla Hume Regional Renewables	Discussions on community energy & zero emissions targets	Update on project details and invitations to events
Community organisations	Rotary/Lions Club	To understand a local project and be able to update their members	Update on project details and invitations to events
VicRoads/ VicTrack	Regulator of made and unmade roads and road reserves.	To ensure project activities abide by safety and regulatory requirements	Provide indicative design plans and updates on the project to prepare for permit requirements

Stakeholder Group	Overview	Objectives – Needs based approach	Activities
	Regulator of rail and rail easements		

3.2. Ongoing engagement across project lifecycle

As well as being oriented towards the needs of individual stakeholder groups, the engagement is also staged in line with the project’s 8 distinct phases. A summary of proposed activities is shown in Table 6, noting that this will change as the project progresses.

For the broader local community, we hold two Community Information Sessions in planning & approvals stage where project timeline, process, maps and surveys are presented, and members of the team are able to answer questions and receive feedback.

Table 8: Community Relations Activities by Project Stage



3.3. Facilitating opportunities for work

Expressions of Interest for work is being received through adverts, information days and the project website. A job interest register for internal use is created to ensure reference during construction and operation phases can be made to list of interested workers. In the pre-construction phase a Local

Employment & Supplier Networking Session will be held in Goorambat, with invitations going out to those on the job interest register and local employment agencies, ensuring they have the opportunity to meet with the appointed construction contractors.

We will also explore the option of an Indigenous Participation Plan with the traditional owners.

3.4. Sharing benefits with local community

Benefit-sharing is integral to our approach to community relations and this element is outlined in greater detail in Section 4. below.

4. Community Benefit-sharing

To ensure both short and long-term benefits flow through to the community as a result of the establishment and operation of GESF, we establish a Community Benefit Sharing Program (CBSP). The CBSP will be designed to deliver benefits to key stakeholders in the community in a way that aims to meet their needs and aspirations.

4.1. Objectives & Principles

Our objectives are to:

- deliver significant and meaningful improvements to the community surrounding Goorambat East Solar Farm;
- ensure a wide range of different stakeholder groups benefit from Goorambat East Solar Farm;
- empower the community to shape the long-term design and implementation of the different initiatives;
- build support for renewable energy in the Hume Region.

The majority of initiatives will be delivered during the construction and operations phase.

In alignment with Neoen’s organisational vision, it is important that the benefit be a true benefit and be tailored to meet each distinct communities’ need.

From an industry best practice standpoint, several principles are seen as being helpful guides in developing or assessing a benefit sharing strategy, as outlined in the table below³:

Table 9: Benefit-sharing Principles

Principle	Description
Appropriate	Benefit sharing is tailored to local circumstances, culture and need, helping to address (not create or reinforce) patterns of conflict or inequality. It makes sense and is appropriate in the local context. The local community provides guidance on how benefit sharing can create a positive, lasting and meaningful impact for their local community. The developer works with the local community to develop specific benefit sharing strategies that respond to their unique local context and need.
Flexible	Benefit sharing is an aspect of project development that will greatly benefit from being open to community involvement, influence and negotiation. Having the

³ Lane, T & Hicks, J, (forthcoming) Benefit Sharing Options for Renewable Energy, 2019, Clean Energy Council

	<p>flexibility to respond to local context will ensure benefit sharing has the best and biggest local impact.</p> <p>The lifecycle of renewable energy developments is significant (25 years or more), a lot can change in a community during that period of time. Therefore, it is important to build in flexibility so that benefit sharing can evolve as the community needs do.</p>
Transparent	<p>The benefit sharing strategy is transparently available to the community and provides a clear and understandable rationale for the various programs and who is eligible to participate.</p> <p>Benefits are freely given for the sake of sharing the proceeds of the project and building relationships. Benefit sharing must not come with conditions of silence or consent.</p>
Integrated	<p>Benefit sharing seeks to integrate the developer and the project as valuable community members by building links and relationships into the community.</p> <p>The benefit sharing approach is integrated with the company's broader approach to community engagement and project development.</p>
Mutually Beneficial	<p>The approach is designed to bring mutual benefit to local communities and the project.</p>
Proportionate	<p>The benefits are perceived as being proportionate to the scale of the project and the level of change or disturbance experienced by local people. Given community members living closest to projects experience greater impacts, they should receive a proportionate benefit.</p>
Strategic	<p>Create a positive legacy in the local community. Look to bring ongoing and lasting value to the local area. Integrate benefit sharing opportunities with broader strategies by building local partnerships.</p> <p>Benefits should be provided from at least the start of construction and throughout the operational phase. One-off payments or payments only during the construction period do not provide ongoing sustainability or support.</p>
Accountable	<p>Systems and processes are deployed to ensure the credibility and reputation of the benefit sharing package and the project.</p> <p>Benefit sharing is managed in a transparent and accountable way that involves local stakeholders.</p>

4.2. Scope of the Benefit-sharing Program

This CBSP does not include:

- required activities under our permit conditions such as for visual screening
- annual council rates payments (where applicable)
- host landowner payments;
- the value of local jobs and investment.

However, it is worth noting that these activities will all deliver significant value to the community.

The dollar value for the CBSP is based on a per megawatt of installed capacity. \$75,000 is the total amount for Goorambat East Solar Farm CBSP annually.

Neoen have a number of mechanisms to enable benefits to be shared in a meaningful and equitable way. Community input will be sought into these options (and any other local ideas) at the community information sessions held in the lead up to planning permit submission and via the community feedback survey.

The final program is likely be a mix of 3-4 benefit-sharing mechanisms from the following:

- Neighbour payments or similar
- Community benefit fund
- Solar and/or storage subsidies
- Lower energy bills - through partnership with an energy retailer
- Community co-investment
- Investment to address specific local issue – e.g. poor mobile coverage, electricity blackouts

Table 10: Options for benefit sharing

Option	Pros	Cons	Requirements	Constraints
Neighbour payments or similar	Provides benefit-sharing option for near neighbours who may be most affected by the project, particularly during construction.	Can be difficult to ascertain a radius / boundary . Can be perceived as 'buying out' neighbours.	Needs to be tailored to the local context. Must be offered without conditions in regards to complaints, avoidance of compliance activities etc. Must be equally applied and transparent.	Population, topography, visual impact, scale. Not applicable to involved landholders.

<p>Community benefit fund</p>	<p>Can create strong regional economic development outcomes.</p> <p>Can create a strong legacy in community.</p>	<p>Often local government can negotiate to 'own' the fund – which may result in a higher cost of administration and politicisation of the program.</p> <p>Often there can be a lack of sophisticated local programs or projects – may need to co-develop.</p>	<p>Strong governance with community representation.</p> <p>Strong evaluation and acquittal.</p> <p>Flexible funding streams to enable longer term projects to access the fund.</p> <p>Consider other existing regional funding bodies and look to enhance or offer a point of difference.</p>	<p>Not applicable to committed activities already funded by any level of government.</p> <p>A goal of 80% of the fund to be spent within the local community region.</p>
<p>Lower energy bills through solar and/or storage subsidies</p>	<p>One off deployment of offer.</p>	<p>Onerous to organise a defensible procurement contract.</p>	<p>Delivered by local CEC accredited installers.</p> <p>Easiest model is to select an installer – perform due diligence and deploy initiative at a fixed price (bulk buy approach).</p>	<p>May be competing subsidies – such as state government that need to be taken into consideration – how to complement?</p>
<p>Lower energy bills through retail offer</p>	<p>Makes sense to people – provides a connection to the renewable energy project.</p> <p>Ability to 'skin' a retailer offer and brand it per project.</p>	<p>Long term issues must be accounted for in the design – new housing developments, transition to solar and battery, competitive retail offers in the future. Customer churn.</p>	<p>Needs the right scale – minimum participation levels.</p> <p>Needs the 'right' discount – i.e minimum of 30% to enable 'sticky' customers.</p> <p>Best delivered with energy efficiency activities.</p>	<p>Retailer desire to partner.</p> <p>Marketing and customer acquisition needs to be resourced during construction phase.</p>

<p>Community co-investment</p>	<p>Enhancing regional economic benefits.</p> <p>Sharing the profits of the wind farm with community retail investors.</p> <p>Enabling participation in the development and deepening the connection and interaction with the project.</p> <p>The economies of scale of large scale projects can delivered significant returns.</p>	<p>Can be challenging to integrate the investment in the back end of the project finance structure.</p> <p>May not be a supported concept in all communities – may be dependent on social economic factors.</p> <p>Can be onerous to administrate – ensure the impact/costs/ delegations are well modelled.</p> <p>Take-up rate can be impacted by drought.</p>	<p>Can be delivered through fractional investment platform Domacom.</p> <p>Need to determine what is defined in regards to investment structure, debt vs equity, length of term, rate of return etc, and what is negotiable for community feedback.</p>	<p>Considerations around equity or debt structures.</p> <p>Consider timing – to reduce community investor exposure to issues such as connection delays.</p> <p>Consider budget for marketing and development and impacts on other benefit sharing initiatives.</p>
<p>Investment to address specific local issue</p>	<p>Can enable direct solutions to broader community needs/issues.</p>	<p>Longevity of solution and appropriateness of solution can be difficult to establish.</p>	<p>Community needs assessment to harvest ideas and then validate a chosen approach.</p>	<p>Consider the budget allocation and how this may impact on other benefit sharing items.</p>

4.3. Benefit-sharing Program Mix

The proposed program mix options for Gooramabat East Solar Farm are analysed in the following section in regards to:

- Identified need in the community
- Summary of mechanism
- Scope for community to shape this initiative

4.3.1. Near neighbours

As those in closest proximity to the project (but who are not involved as host landowners) we acknowledge that near neighbours are a special stakeholder group, who will be particularly impacted during the construction phase.

We commit to ensuring that all near neighbours have the opportunity to meet with one of the project team face-to-face before the first public community information session. Compliance related activities such as vegetative screening will be rolled out in accordance with the permit. There will be no voiding of the ability for a neighbour to make a complaint or claim compliance activities such as tree-planting should they take up the proposed agreement.

Identified need in the community

The construction period of the solar farm is the most disruptive to near neighbours. At the height of construction efforts will be made to reduce road congestions, dust and noise, however inevitably there will be residual losses to near neighbours. The estimated value of the community benefit fund (commencing from operation) will be distributed directly to near neighbour of the project during the construction phase. This will not negate their ability to make complaints about the development or construction process.

Summary of mechanism

The strategy for neighbours is to firstly sign neighbour deeds and then make neighbour payments once construction commences. Neoen will commit \$10,000 to residents within 500m of the solar panels at the commencement of construction.

4.3.2. Community Benefit Fund

Identified need in the community

Neoen is proposing an annual Community Benefit Fund for the Goorambat East Solar Farm for the purpose of maintaining and improving opportunities for the local community to thrive. Neoen is proposing in the planning permit the following measures:

- The value of the Community Benefit Fund will be \$75,000 p.a. from the date the solar farm starts operating, for the lifetime of the project.
- This fund will be managed by a committee of up to 7 members with
 - o 4 living or working within 10km of the solar farm,
 - o at least 1 council representative, and
 - o 1 Neoen representative.
- The inaugural committee will be determined by Neoen with members being elected for 3 year terms. Subsequent responsibility for committee selection will be determined by sitting members or can be deferred to the Council.
- Up to \$15,000 of the annual fund would be dedicated to School and Trade scholarships for local residents

- The remainder of the fund would go to project that would benefit the community. If applications outweigh the available funds then 80% of the fund is to stay within the local areas (Goorambat, Major Plains, Stewarton, Dookie and Broken Creek)
- The fund will not be eligible for existing projects already funded by state or federal governments.
- An equivalent sum will be made available by Neoen at their discretion from the commencement of construction and up to the commencement of the Community Fund. This amount will be pledged to neighbour agreements for construction disruption for residents living with 500m of the solar farm boundary.

Note that the proposed level of funded may be adjusted based on the approved size of the project.

Summary of mechanism

Funded projects need to align with at least one of our community growth focus areas:

1. Environmental sustainability - participation, development and uptake of new technologies and ideas
2. Health and wellbeing – contributing to improved health and wellbeing outcomes
3. Strong connected communities – community participation, involvement and connection
4. Sport and recreation – increasing participation in sport and recreational activities
5. Arts and culture – fostering creativity and connection in the community through art and culture
6. Skills, education and training – addressing local skills development and educational opportunities

Scope for community to shape this initiative

Community feedback is being sought on the appropriate administering body and mix of fund members.

4.4. Timeline and implementation

Table 11: Benefit Sharing Program Implementation Timeline

Benefit sharing option	Site selection – feasibility	Planning	Pre-Construction	Construction	Operations
Neighbour Agreements	Investigate	Develop Neighbour deeds	Implement	Maintain	Maintain
Community Benefit Fund	Plan	Investigate	Design	Design	Implement

4.5. Total value of the program

Table 12: Benefit Sharing Program

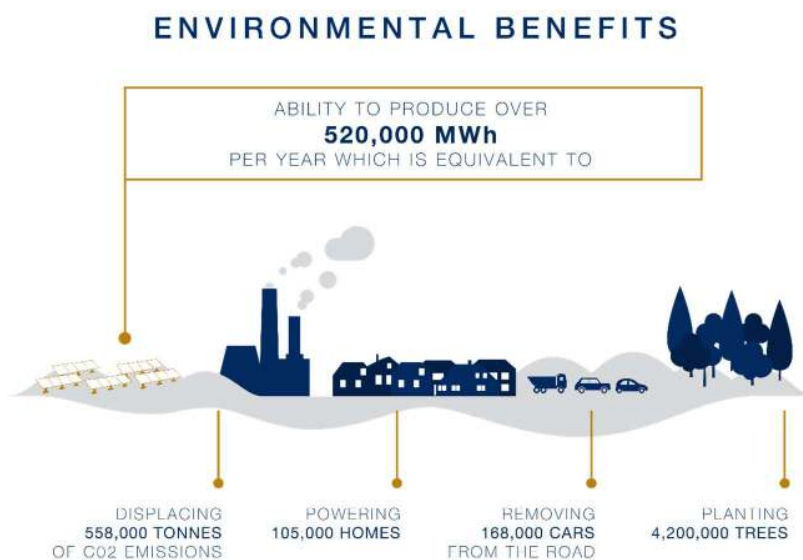
Initiative	Pre-Construction	Construction	Operations (25 years)	Total \$ contribution
Neighbour Agreements		\$10k per resident living within 500m		Not to be disclosed
Community Benefit Fund			\$75k p.a.	\$1.865m (at 2019 cost)
Benefit Sharing Projects	Est. \$75k			
Total Value				Est. \$2m (at 2019 cost)

5. Communication tools

The following communication tools can be generically utilised for the project communication activities including media release, website etc.

5.1. Environmental benefits

The following infographic represents the per annum generation and environmental offsets applicable for Gooramabat East Solar Farm. This data comes from Neoen’s bespoke Environmental Calculator.



5.2. Economic benefits

The following infographic is developed using specific estimates for Gooramabat East Solar Farm.



5.3. Key messages

Key messages assist in providing information in a consistent way. Initial key messages (*to be developed further by the project team*), for the Gooramabat East Solar Farm are as follows:

Table 13: Key messages

Theme	Key messaging
Neoen Australia	<p>Neoen is an independent power producer specialising in renewable energy.</p> <p>We have a vertically integrated business model meaning we ‘develop to own’. This means we will be the long term owners and operators of the project.</p> <p>Goorambat East Solar Farm is managed by a highly experienced team from internationally recognised leaders in their field.</p>
Innovation and technology	<p>This project is ambitious, innovative and ground-breaking in Neoen’s readiness to extend the productivity of the solar farm land to include sheep grazing techniques proven on other operating Neoen projects.</p> <p>With a commitment to commence early soil testing and improvement activities and with experience on other operating solar farms we are advancing knowledge of how to combine agriculture and solar successfully and productively, include sheep grazing and carbon farming. We are working with CSIRO to identify areas for future research.</p>
Project areas & phasing	<p>The Goorambat East Solar Farm is a stand-alone project with financial viability and part of the Goorambat Stewarton Solar Farms being developed by Neoen.</p> <p>It will be presented to the Benalla Rural City Council as a separate planning permit with the potential to proceed through to construction on its own merits.</p>
Jobs & growth	<p>Goorambat East Solar Farm will result in 250+ direct jobs during construction, and 6-8 ongoing jobs.</p> <p>We are committed to employing local people where possible and will hold a Local Employment & Supplier Networking Session prior to construction.</p>
Community	<p>The project will result in many benefits to the local community including local jobs and economic prosperity into the future.</p> <p>Neoen will work closely with the local community and will listen to concerns, ideas and opportunities.</p> <p>Neoen is committed to sharing benefits with the local community in meaningful and equitable ways.</p> <p>Neoen will establish a \$75,000 annual Benefit Sharing Program for the Goorambat East Solar Farm which will include a number of benefit sharing mechanisms.</p>

	<p>Neoen will seek community input and involvement in the structure and mechanisms of the benefit sharing program.</p>
<p>Environment</p>	<p>Goorambat East Solar Farm is a large-scale renewable energy project which will substantially mitigate against climate change.</p> <p>The Goorambat East project has the ability to produce over 520,000 MWh of electricity per year, the equivalent to:</p> <ul style="list-style-type: none"> Displacing 580,000 tonnes of Co2 emissions Powering 105,00 Homes Removing 168,000 cars from the road Planting 4,200,000 trees
<p>Key social risk messages</p>	<p>A social risk register is kept internally by Neoen. Two risks concerning the community have been highlighted including</p> <ul style="list-style-type: none"> - managing CFA expectations for bushfire readiness and mitigation; and - communication to the community of intention to manage agricultural use opportunities on the land under the panels to mitigate any potential loss in food production in the area.

6. Complaints process

The following process has been developed in accordance with the Australian / New Zealand Standard Guidelines for complaint management in organisations and in consideration of recommendations from publications by the National Wind Farm Commissioner:

- Complaints Management Plan
- Toll free telephone number, email contact for complaints and queries

In addition, internally a Complaints Register has been established which records:

- the complainant's name and address (if provided);
- applicable property reference number contained in the stakeholder and GIS databases;
- a receipt number for each complaint, which must be communicated to the complainant;
- the time and date of the incident, and the prevailing weather and operational conditions at the time of the incident (once operational)
- a description of the complainant's concerns, including (for a noise complaint) the potential occurrence of special audible characteristics;
- the process for investigating the complaint, and the outcome of the investigation, including:
- the actions taken to resolve the complaint.

7. Reporting, Evaluation and Continuous Improvement

This plan will be continuously monitored and updated to reflect the themes and issues emerging from engagement. Ongoing market research and media monitoring will be undertaken to better understand the underlying narrative in the community regarding the project and to assess the key messaging and effectiveness of the communication and engagement activities.

Neoen is committed to continually improving the approach to and identifying opportunities for the community to shape future plans and initiatives. Where possible, monitoring and evaluation activities will be designed to complement other engagement activities. A detailed monitoring and evaluation plan would be developed if the project is successful in obtaining its planning permit.

Evaluation is not a stand-alone or isolated process rather; evaluation is an integral and on-going component of every communication and engagement activity or process. Consequently, evaluation at the beginning of the consultation planning process is as important as it is during and following implementation. Evaluation is a vital element for forward planning and can provide a strategic basis for decisions about issues, including the allocation of resources.

The evaluation process consists of two components:

1. Outcomes – increased satisfaction, awareness or attitudinal change
2. Outputs – measuring and monitoring what is actually produced, released or implemented

Table 14: Evaluation Process - Outcomes and Outputs to be achieved

Evaluation	What will be achieved?
Outcomes	<ul style="list-style-type: none"> - General community awareness and understanding of the project. - Long term broad local social acceptance of the solar farm - Widespread understanding among project team, employees, residents, stakeholders and broader community of Neoen’s commitment to engaging with the community - General satisfaction among stakeholders that they have been given the opportunity to express their views and that they have been heard - Expectations and issues managed effectively through communications and meaningful engagement - Strong local relationships and trust
Outputs	<ul style="list-style-type: none"> - Social risk analysis - Data collected from Feedback Forms throughout the Project - Regular departmental meetings and reporting - Progress meetings with applicant and government - Issue timely and relevant media releases, project bulletins, email broadcasts, direct mail letters and FAQs - Update website with timely and relevant information (ensure email enquiries are logged and responded to)

	<ul style="list-style-type: none"> - Schedule for Community Information Days, Open Day, Site Tours, Neighbouring Landholder Forums and other face-to-face engagement events and briefings - Schedule regular briefings with key stakeholders i.e. Council. - Introduce, manage and maximise benefits from 'stakeholder issues database' - Ensure Stakeholder Database is regularly updated, so that relevant stakeholders receive project updates - Complaints register - Community-developer partnerships - Benefits sharing model tailored to the local context - Local advocates for renewable energy
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7.1. Objectives of evaluation

The objectives of monitoring and evaluating the delivery of the activities outlined in this CRP are to:

- identify opportunities to improve the approach;
- ensure key stakeholders including the community, partners, and contractors have a clear understanding of the progress and performance of key initiatives;
- identify opportunities for the community to shape future plans and initiatives;
- ensure a current understanding of community concerns and to track any complaints;
- report back to key stakeholders about the performance of Goorambat East Solar Farm and associated programs

7.2. Methods and process

The reporting will show the progress against the plan and timelines that are outlined in this CRP. In particular, Neoen will ensure the reporting process is transparent with information about what has gone to plan, what hasn't and why, what has gone to schedule, what has been delayed and why.

The following section outlines how input (feedback, submissions, comments etc.) from stakeholders will be recorded, considered and addressed throughout the project and **presented to relevant stakeholders including Government departments.**

It is proposed that the project manager would be responsible for the monitoring and evaluation.

The project manager would be responsible for establishing an Evaluation Committee which would contain a selection of representatives, and would be expected to include:

- Project Manager
- Contractor representatives during construction
- A host landowner
- A neighbour
- Representative from the community

7.3. Timeline

During planning and construction, it is proposed that reporting occurs on the following:

- Stakeholder Risk (including complaints)
- Community engagement
- Benefit sharing

This could occur during planning – as a baseline survey, and then a second feedback survey could occur at the start of operations as a follow-up/tracking of shifts in awareness/support etc.