From the office of the Mayor  
City of Onkaparinga

14 October 2019

Michael Lennon, Chair  
State Planning Commission  
GPO Box 1815  
ADELAIDE SA 5001

Dear Mr Lennon

**Discussion Paper on Renewable Energy Policy in the Planning and Design Code**

Thank you for the opportunity to provide informal feedback on the State Planning Commission's Discussion Paper on Renewable Energy Policy in the Planning and Design Code (Code).

We understand the purpose of the Discussion Paper is to provide guidance to updating existing planning policies to ensure they keep pace with changing technology that underpins renewable energy generation.

The Commission has advised that formal public consultation on the proposed renewable energy policies, will commence in October 2019 when the Code is released.

The City of Onkaparinga commends the State Planning Commission (the Commission) on recognising the key role of planning in the establishment of energy infrastructure and the need to provide policies that allow for creative and innovative responses to energy demand and supply, while addressing potential impacts on communities and the environment.

The City of Onkaparinga itself will be installing close to 1,000 solar panels at three of our highest energy-consuming sites. Whilst this is expected to substantially save money each year, just as importantly this will reduce our emissions by an astounding 33 tonnes of CO2 annually.

Onkaparinga residents are also demonstrating their environmental commitments and energy use awareness with 37 per cent of homes having solar power compared to the rest of the state at 30 per cent, equating to over 28,600 installations in the last 15 years. The largest commercial installation in our region is a 1.8 MW system at Vicinity's Colonnades shopping centre where nearly 5,000 solar panels were laid and connected in early 2019.
The City of Onkaparinga have also been responding to climate change for over a decade in both a leadership role and through collaboration with other councils and agencies. The decisions we make about how we plan and build our assets and infrastructure, and the developments we approve will directly affect how resilient Onkaparinga is to climate risks. This in turn will affect whether our communities thrive or struggle as our climate continues to change.

We have been leading the way in urban heat mapping, increasing our tree canopy cover, reducing our emissions, community engagement and monitoring our coastal erosion. We acknowledge the vital importance of demonstrating our commitment to environmental sustainability and in turn responding and adapting to climate change.

Recently, Council approved the development of a Climate Change Response Plan which will begin later this year. The new Plan will build upon our achievements, review our existing work, and reflect the current science, policy and regulatory context in which we operate.

**State Planning Policies for South Australia**

The recent gazettal of the State Planning Policies (SPP) sets out the framework for land use in South Australia that aims to improve the liveability, sustainability and prosperity of the state.

We note SPPs will be applied throughout South Australia and must be considered when preparing or amending a designated planning instrument such as a Regional Plan or the Planning and Design Code (the Code).

Of relevance to the Discussion Paper on Renewable Energy Policy in the Planning and Design Code is SPP 5 Climate Change given the correlation between renewable energy and mitigating climate change impacts.

**SPP 5 Climate Change**

*Climate change will impact all areas of our society. Our future prosperity, the liveability of our cities and towns, the health and wellbeing of our communities and the resilience of our built and natural environment all depend on how well we adapt to and mitigate the impacts of climate change.*

Moving to renewable energy is one key factor in addressing climate change.

**Proposal for the new Code**

Within the Discussion Paper, it rightly notes that policy regarding the functioning and environmental impacts of renewable energy facilities needs to be considered in the Infrastructure and Renewable Energy General Development Policies of the Code.

Land use planning can play a critical role in climate change adaptation. Strategic and local planning decisions can both increase or decrease the exposure of human settlements to climate change impacts. If undertaken effectively, land use planning can support climate-resilient and low energy development.
Further, it notes the policies contained within this module will maintain the scope and intent of the current South Australian Planning Policy Library (SAPPL), with the following notable additions that will apply state-wide:

- policy addressing particularly large-scale wind farms, solar photovoltaic arrays, solar thermal plants, grid-scale batteries, biofuels facilities and pumped hydro systems
- some tightening of policy to deal with areas of concern such as dust, noise and amenity
- policy addressing decommissioning and rehabilitation of renewable energy facility sites.

**Zones**

We note the Discussion Paper states that the 'Rural Zone should explicitly anticipate the development of renewable energy facilities to enable South Australia to continue to accommodate these facilities.'

More specifically, the Discussion Paper further states 'solar farms are best located in areas with soil not capable of supporting high productivity agricultural activities and landscapes that are not of significance.'

Notwithstanding the City of Onkaparinga supports renewable energy generation, we are also mindful of balancing the protection of valuable agricultural land.

In principle we agree smaller scale facilities may be appropriate in the Rural Zone, however we would like to see a Practice Direction which requires the proponent to demonstrate that the land in question is not viable for agricultural activities.

**Overlays**

Overlays are stated to be used to restrict environmentally and culturally significant areas from contemplating these facilities.

Based on current policy we understand that these facilities will be restricted in the McLaren Vale Character Preservation District overlay. Whilst we envisage larger facilities to be restricted, there may be some locations suitable for smaller facilities however any support would be subject to appropriate policy guidance in relation to adequate setbacks and landscaped buffers.

**Definition for renewable energy facilities**

We agree that the definition for renewable energy facilities will need to be updated and we consider there are several parts to this; the type of use, scale and whether sited on a building or on-ground. The definition should also make a distinction between ‘domestic’ verse ‘commercial’.
Given the continuing improvements in technologies, scale should reflect the area of land required to accommodate the facility rather than the amount of energy generated.

The Clean Energy Council calls ‘large scale’ those solar farms over 5MW (which is also the Office for the Technical Regulator’s threshold for requiring a certificate – i.e. compliance with legislation and applicable technical standards).

As a comparison the Vena Energy's 95MW Tailem Bend solar power plant covers an area of some 250 hectares. Based on the Tailem Bend example, we estimate a 5MW facility would likely cover an area of approximately 12 hectares.

We want to encourage renewable energy and at present particularly solar, but we question if this scale is too large within our region noting the Character Preservation District and proximity to our towns and residential areas.

Solar

As the Discussion Paper notes, the concern is the possibility of a solar farm occupying valuable primary production land given the area they cover. Solar farms are best located in areas with soil not capable of supporting high productivity agricultural activities, landscapes that are not of significance and or near settled areas.

We understand that the Code will provide protection in respect to habitat impacts and avoidance of areas of environmental significance. On this basis we concur that the 100m setback should be increased to a minimum of 500m from any national park or conservation area.

Likewise, we also support the recommendation that large-scale solar farms also be designated as ‘restricted’ forms of development in these areas (i.e. relevant zones and overlays) combined with additional policy to mandate greater setbacks from non-host landowner boundaries and that a portion of the setback is allocated for landscaped buffer treatments (where required).

Pumped hydro

The Discussion Paper in relation to pumped hydro notes that should a development proposal be considered, the current policy settings provide guidance in respect to design and siting, infrastructure, interface between land uses, site contamination and natural resources policies. Moreover, the Discussion Paper recognises the importance of the policy module which relates to ‘natural resources, in respect to vegetation clearance, excavation and filling of land, water quality controls, and watercourse impacts, which are key issues in the assessment of these types of facilities.’

The Discussion Paper recommends there are no additional policies required based on the state government's recent experience, noting that many of the siting and infrastructure requirements (i.e. clearance of native vegetation, extensive earthworks) can be assessed against general development provisions.

As the Onkaparinga Development Plan contains the SAPPL General Development provisions, we support this position.
Battery Storage Facility

We understand that new battery storage facilities are being incorporated as either essential project components, or as standalone developments.

In comparison to solar or wind farms, these facilities have a relatively small footprint and building appearance. The Discussion Paper provides the example of the Hornsdale 100MW 'big battery' being approximately 1ha in size. We note this isn't one continuous built form rather it is made up of numerous smaller components with spacing between. As such, we agree the Code can rely on existing SAPPL policies and does not require new policies.

Notwithstanding this, we support additional perimeter landscaping being required to help obscure or mitigate the industrial appearance of the battery storage units from adjoining land or residences combined with standard setback provisions for industrial type developments.

The Planning and Design Code implementation

In July 2020, the Planning, Development and Infrastructure Act 2016 will become operational for all metropolitan council areas, revoking all existing metropolitan development plans.

The implementation by July 2020 of Phase Three of the Code is the final stage in the new planning and development system for the state, replacing all operations under the Development Act 1993 with the new legislation.

We look forward to Phase 3 of the draft Planning and Design Code commencing public consultation in November 2019 and the consideration of renewable energy policies together with matters raised in this and our other submissions made.

We welcome the opportunity to discuss the matters raised above and if required provide further explanation.

Should you have further questions, please contact Craig Jones, Development Policy Planner on [redacted] or email [redacted].

Yours sincerely

Erin Thompson
Mayor