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Submission on the Discussion Paper on the Proposed Changes to Renewable Energy Policy in the Planning and Design Code, and on the draft Code itself

To whom it may concern,

The high penetration of renewables in South Australia has succeeded in lowering wholesale electricity prices while storage has helped avert potential negative impacts of greater reliance on intermittent sources of electricity supply. Historically, SA has had the highest energy prices of any State, yet in October 2019 it had the lowest wholesale process in the National Electricity Market. SA has shifted from zero large-scale wind, solar and storage, to 2,675MW over 15 years. The State is now a net exporter of electricity. This has occurred because of far lower costs of solar and wind energy and battery storage compared to the recent past.

<https://reneweconomy.com.au/south-australias-stunning-renewable-energy-transition-and-what-comes-next-79597/>

With world-class wind and solar resources, SA is very well positioned to benefit enormously from further significant investment in renewables as part of a global economic transition to zero carbon.

It is important that regulatory systems support generation of renewable energy wherever there is capacity to do so without unreasonably compromising environmental quality, and supports transformation of the transmission system to allow huge expansion of supply from regions (notably South Australian regions) of high-quality renewable resources.

A huge expansion is warranted to meet the generally accepted target of zero carbon by 2050 (ideally considerably sooner), to offset expected closure of large coal-fired generators in the eastern States, and to support a transformation of manufacturing in Australia given the potential for world-competitive renewable energy prices to be achieved to great advantage of regional manufacturing locations such as the Iron Triangle (the reverse of the current situation where we tend to be out-competed by overseas locations) as identified by distinguished economist Ross Garnaut in his recent book, 'Super Power'.

South Australian governments have grasped the significance of the 'renewables revolution'. It is much to the credit of the present State Government that it supports extending interstate transmission that in a way that supports further development of South Australian wind and solar resources of generally higher quality than in NSW and Victoria.

Other important context to the formulation of planning controls for renewable and other energy infrastructure, include:

- the need to accommodate innovative responses to the challenges of the present century, including global warming, extremer weather and climate-related events, and the associated need for more resilient infrastructure like micro-grids;
- the need to not unduly restrict benign renewable energy and storage facilities, but rather support their integration with settlements and non-energy sector enterprises and land uses like manufacturing and farming to enhance commercial, economic and social resilience;
- native vegetation in South Australia's agricultural regions was very extensively cleared – more so than in any other State – making it imperative protect it from incompatible development.

Turning to the draft State Planning and Design Code, it is noted that an aspiration of planning reform has been to shift to a more performance based system of planning controls that is non-

prescriptive and facilitates proposals capable of avoiding undue adverse impacts.

The renewable energy sector has generally been fairly well supported by the nature of planning controls in SA – even planning reviews by the ERD Court – a fortunate outcome given the positive contributions made in mitigating climate change and to the State economy.

Contrary to some statements, the renewable energy sector can be very compatible with agriculture, for example, offering alternative income to rural landowners and businesses in droughts and other times of hardship.

Rural locations are where the majority of renewable generation needs to be to sustainably and affordably power urban and industrial uses, and indeed the resources sector.

To the extent that there is an emphasis on production (if not conservation where there are features of conservation value) it is valid to lean towards the concept of mixed use zones rather than single or predominant use zones in modern rural landscapes that do not embrace ‘new uses’ like renewable energy resources. It is noted that the system of rural zones proposed does not closely fit any systematic classification and assessment of agricultural land capability. Rural areas (and the zones proposed for them in the draft Code) include land of low agricultural value where any ‘threat of alienation’ by extensive renewable energy facilities like solar farms is inconsequential. Indeed, in some cases, it may be much more valid to consider location in relation to native vegetation as the key factor.

Supporting renewable energy development should be a default objective of zones in rural and peri-urban regions, unless there are tangible and significant constraints to facilities of substantial scale such as in areas of closer settlement or native vegetation.

By contrast, the Rural Zone supports Renewable Energy Facilities only if they “support” rural production or value adding industries.

For example, in the Rural Zone there is a presumption that facilities support a narrow ranges of uses and not for example a nearby town:

“PO 9.2

Small-scale ground mounted solar power facilities support rural production or value adding industries.

DTS/DPF 9.2

Solar power facilities:

...(b) generate power which is to be used wholly in association with a primary production industry, a value adding industry or local infrastructure facility on the same allotment... “

In others’ comments on Phase 2 of the draft Code (viewed on-line), a number of further shortcomings in the draft Code’s treatment of renewable energy facilities are identified. These are listed below. It is important to address them to ensure that this State remains a leader in mitigating climate change and capitalizes on the global transition to zero carbon.

1. The definition of ‘renewable energy facility’ to exempt certain minor facilities conditions the exemption on supply of electricity to a single land use. This seems unusual, unwarranted and unreasonable when many facilities of minor scale and benign impact would supply power to the national grid or a micro-grid or otherwise multiple users.
2. Unrealistic setbacks from property boundaries potentially ruling out smallish solar farms on Riverland blocks. A Code that is genuinely performance-based would not contain such arbitrary criteria - even if non-mandatory. It would be clear about outcomes or impacts it seeks to avoid or promote. In this case, the intent and justification of the setback from property boundaries provision is unclear, but one outcome might be loss of income support for rural landowners and of a way of reducing power costs in an environmentally appropriate way. It is noted that restrictions imposed by AEMC may be driving a number of proponents to opt for small-scale facilities.

3. Promoting potentially more rather than less solar farm developments by setting a notional limit on generating capacity per property (30MW). Most of the solar farms proposed recently are considerably larger than this, yet are not contemplated at such scale by the draft Code including obvious sites close to the new interstate interconnector and existing grid. This is an arbitrary 'standard' without clear purpose. It does not promote optimal use of optimal sites, or investment located to take best advantage of new interstate transmission line.
4. I generally agree with and support comprehensive comments on the renewable energy policy of the Planning and Design Code (PD Code) – Phase 2 (consultation version October 2019) by Julie Jansen of MasterPlan SA Pty Ltd, submission dated 29 November 2019.

In addition, it appears boundaries of supposedly landscape-based constraints to renewable energy facilities in the Flinders Ranges will need to be reviewed because:

- They encompass areas of fairly flat terrain (eg. west of the ranges) and low scenic quality as well as some of the iconic 'high ranges' scenery
- There is some obvious discontinuity between the application of constraints in the Out of Councils area and Flinders Ranges Council.

Underpinning the Code with constraints and opportunities analysis that is contemporary and rigorous is a prerequisite for balanced, reasonable and sustainable outcomes in an era where local sourcing of renewable energy is increasingly a key to resilience.

The author is a qualified planner with 30 years experience in the investigation and preparation of planning policies, primarily in South Australia.

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