

29 November 2019

Department of Planning, Transport and Infrastructure
Lodged electronically: DPTI.PlanningReformSubmissions@sa.gov.au.

Submission regarding South Australia's draft Planning and Design Code

Dear Madam/Sir,

Thank you for providing us the opportunity to provide comment on South Australia's draft *Planning and Design Code* for rural areas (phase two).

Canadian Solar is a global leader in the solar industry, with a strong market position and track record for delivering solar power solutions both within Australia and internationally. We are committed to delivering more clean, safe and affordable renewable energy and, as such, fully support the South Australian Government's review of existing planning policies to enable delivery of new and more efficient energy infrastructure.

We would like to respond on the following points within the draft Code:

Prescribed setback distances

The draft Code sets out new setback distances for solar farms, including a 30-metre setback from all adjoining land boundaries. While Canadian Solar is committed to minimising environmental impacts from both construction and operations, we support performance-based assessments to determine noise and visual impacts, rather than the use of prescriptive setbacks. The flexibility to use a performance-based approach has already proven critical to the successful delivery of many solar projects. This gives us the opportunity to work with both the community needs and the specific design goals of each project. The introduction of a mandatory 30-metre setback from every neighbouring property boundary has the potential to discourage solar energy development in appropriate areas.

Landscaping requirements for solar farms

Canadian Solar does not support a requirement for mandatory landscaping to 'buffer' the local community from a solar farm. Solar farms currently operating both within Australia and overseas are often visible from the local roads. This enables us to celebrate our solar farms, by creating positive discussion, interest from local schools, tourism and a sense of pride within the community. Further to this, buffering is not necessary to protect the community from the solar farm, as operations are quiet and odourless. Glare from a solar farm is minimal, with solar panels typically reflecting a lower percentage of light than flat water or a steel building. This is why solar farms around the world are operating successfully near major airports. To further reduce any light reflections, module manufacturers now offer solar panels with anti-reflective treatments. This increases light transmission through the panel and minimises ocular hazard. We do acknowledge that landscaping may be appropriate and required in sensitive areas and we support minimising vegetation removal where possible during construction and operations. However, it is critical for each solar farm to have the flexibility to work with each community on local vegetation requirements, including those in drought effected areas.

Wildlife movement

Canadian Solar supports the principle that wildlife corridors and habitat refuges can be incorporated into solar farms as appropriate. Solar farms are high voltage power stations, however, and perimeter fencing is needed to ensure safety and security during both construction and operation, for personnel, animals and equipment. This

aspect of the new Code should again give proponents flexibility to meet the wildlife movement objectives without compromising safety of the solar farm.

Canadian Solar appreciates the opportunity to provide comment on the Draft Planning and Design Code. For any queries on our submission, please contact us.

Yours sincerely,



Samantha Coras

Canadian Solar Australia

Energy Group

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