

From: [Paul Mickan](#)
To: [SA Planning Commission](#)
Subject: Discussion Paper on Renewable Energy Policy in the Planning and Design Code - Practitioner comments - Paul Mickan
Date: Friday, 23 August 2019 4:48:33 PM

I submit the following comments on the Discussion Paper on Renewable Energy Policy in the Planning and Design Code. These are my personal comments and do not necessarily represent the view of my employer, The Barossa Council.

The paper only deals with large commercial scale renewable energy facilities and provides no policy direction for domestic scale renewable energy facilities.

Scope exists to introduce more flexibility and streamlined approval procedures for ground-based solar panels/systems, particularly in primary production and rural living areas. In this context it is perplexing that an entire system can be placed on a roof, but the moment even a single panel is placed at ground level it requires development approval.

The Planning and Design Code needs to provide assessment pathways for solar systems that do not meet the exemptions and therefore require development approval - e.g. accepted or deemed-to-satisfy up to a certain scale. Unfortunately the Phase 1 code for outback areas does not list ground based solar systems for example as either Accepted or DTS and therefore they default to Performance Assessed Development. Pursuant to zone provisions they then require public notification. This approach is considered too onerous.

The Code should provide clearer direction about domestic scale wind generation. There appears to be a current misunderstanding that small turbines are a 'windmill' and therefore exempt up to a certain height; however a wind generation turbines are not a windmill which grinds...

Another emerging technology which the planning reforms (including the discussion paper) have overlooked are domestic scale battery storage facilities. The new regulations in Schedule 13 exempt a "battery storage facility for the purposes of supporting the security or reliability of the State's power system"; by implication a small domestic facility is development which requires approval. If this is the intent of the Commission then suitable assessment pathways are required – e.g. a Tesla battery inside a garage surely should be exempt from approval. Again, unless these facilities are referenced specifically they will default to Performance Assessed Development requiring public notification!

In summary, I think the Commission has missed a unique opportunity to introduce real reform and to create a regulatory system which facilitates new forms of domestic scale energy production and storage facilities.

I would be pleased to discuss these comments in more detail.

Regards,

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