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**To:** SA Planning Commission  
**Cc:** Gerard Coutts  
**Subject:** DPTI Renewable Energy Policy Discussion Paper - Feedback

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Some preliminary feedback on this DPTI discussion paper particular to solar farms. Our primary concern is the mandated 100m setback from neighbouring properties or townships, which is quite arbitrary and needs more finesse in qualifying this requirement and should be a guide with some provision for flexibility for development assessment on a case by case basis.

A case in point is a new urban development (greenfield expansion) at Mallala to increase the footprint of the town with the intention to be a more sustainable development than what South Australia typically experiences with traditional developers. A requirement of the development is an area of land as a buffer for the town to improve resilience to bush fires. This has come out of the impact of the Pinery Fires. Rather than have vacant land with not return for the community in public benefit other than a fire buffer zone, the development proposes as solar farm with battery storage to be structured as a community energy cooperative. The solar farm is integrated into the design of the land division and as such the 100m buffer proposed is contrary to the economic, environmental and community benefits of a solar farm as an integrated design of the development which benefits future residents and surrounding community. Both Council and existing residents support and welcome this feature of the land division.

So our submission is to have more foresight and flexibility to understand that urban development of the future will see many more large, small and micro embedded energy systems in developments to create a web of networked and often locally contained energy grids that can support rural communities and their businesses. Arbitrary setbacks, mandated in policy is neither visionary or adaptable to changing technology and urban design practice for sustainable communities.

We agree that potential impacts such as glare need to be assessed but these can be managed through principles of good urban design. The concern for heat is negligible compared to a roof and walls of a house. Solar panels in a solar park provide shelter for animals, invertebrates and native ground covers that can double up in solar parks to become a local ecosystem and to encourage much needed biodiversity, especially in rural areas such as Mallala that suffer from monoculture crops creating pest and disease issues.

So I encourage more visionary thinking about what renewable assets can mean for community in urban and rural areas. Being able to have localised renewable energy infrastructure to reduce significant poles, wires and transformers across landscapes will itself reduce visual and environmental impact and reduces the infrastructure cost burden for Government and society in augmenting energy supply to new urban growth areas through the old fashioned centralised energy infrastructure model. In this context, micro grids and localised energy production will emerge as the new model for energy infrastructure which the proposed policy doesn't accurately account for.

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