

16 February 2018

Department of Planning and Environment  
[information@planning.nsw.gov.au](mailto:information@planning.nsw.gov.au)

Dear Sir/Madam,

**Clean Energy Council submission on the Draft NSW Large-Scale Solar Energy Guideline**

The Clean Energy Council (CEC) is the peak body for the clean energy industry in Australia. We represent and work with hundreds of leading businesses operating in solar, wind, energy efficiency, hydro, bioenergy, energy storage, geothermal and marine along with more than 5,000 solar installers. We are committed to accelerating the transformation of Australia's energy system to one that is smarter and cleaner.

The Clean Energy Council welcomes the opportunity to make a submission on the draft New South Wales' Large-Scale Solar Energy Guideline.

As you are aware, 2017 was a significant year for the renewable energy sector, with more than 50 projects collectively worth \$9.3 billion reaching financial close in Australia. Thirty of these were in large-scale solar, and a further two were hybrids of wind and solar.

With excellent solar resources, New South Wales stands to benefit from the investment and job opportunities associated with these developments, and we note the strong level of development applications currently being considered by the State Government.

We commend the State Government on the support it is providing for the sustainable development of the sector through the expertise and advice offered by the Department of Planning and Environment, the Office of the Renewable Energy Advocate, and now this guideline.

The CEC is supportive of the guideline which clarifies the process and expectations of the solar developers working through the State Significant Development process.

We would like to make a few observations with regard to the issue of site selection for your consideration in the finalisation of the document.

The guideline notes that

*'Large-scale solar development is not constrained by access to resources to the same extent that mines or other forms of renewable energy generators are. As such, site selection provides a strong opportunity for a solar development to minimise its adverse social and environmental impacts and consider stakeholder issues early in the design phase.'*

The NSW Government correctly identifies site selection as a critical choice in the development of a solar project. Our members work through a large number of issues in

locating a suitable site, including proximity to the grid, solar resources, zoning, topography, native vegetation and biodiversity, and community support for solar developments.

#### Site selection is constrained by the electricity grid

While we agree that there are abundant solar resources in many parts of New South Wales, it is important to note that considerable constraints exist with regard to the electricity grid. Developers are limited both in terms of geography and the capacity of the transmission network.

Large-scale solar projects generally need to be located within close proximity to the grid in order for the project to be considered financially viable, due to the high costs associated with transmission extensions. In addition, capacity constraints on the transmission network mean that there are a limited number of new generation facilities that can be accommodated. This significantly reduces the number of available sites for such projects.

As such, the CEC is very supportive of the work currently being undertaken by the Australian Energy Market Operator to develop an integrated system plan, which would identify prospective Renewable Energy Zones across the National Electricity Market to improve capacity. It will be important that when considering potential zones, this process considers social and environmental as well as economic factors.

#### Site selection is constrained by the availability of suitable land

The availability of clear, flat (or gently sloping) land, in close proximity to the grid, without the constraints of surface rock, flooding, shading, geotechnical issues and underground infrastructure can be difficult to find. Typically, such land is presently used for grazing and/or cropping.

#### Community engagement

The CEC and its members are committed to positive community engagement and participation, and recognise that good engagement begins as early as possible in the project lifecycle.

Developers will generally establish initial engagement with relevant landowners and local council/s to introduce the project proposal and consult on key issues such as siting options, landscape and visual amenity, native vegetation and biodiversity, glint and glare, property value, and land management and maintenance.

This process can help developers to better understand the social context and to secure an agreement to use the land if the project moves forward.

While openness is important for building trust, it is important to note that developers will often need to exercise a degree of confidentiality in this early engagement activity. This is because public acknowledgement of the site under consideration may be commercially sensitive within the current competitive environment. Developers are also concerned not to create unnecessary stress or expectations in the community at this early stage.

Once again, the CEC would like to commend the NSW Government for developing the guideline to enhance clarity around the planning and assessment process for large-scale solar developments. We look forward to working with you further in this exciting phase of the industry's development.

If you have any further questions with regard to this submission, please contact Anna Freeman on 03 9929 4124 or via email at [afreeman@cleanenergycouncil.org.au](mailto:afreeman@cleanenergycouncil.org.au).

Yours sincerely,

**Anna Freeman**  
**Director, Energy Generation**