

**From:** [noreply@feedback.planningportal.nsw.gov.au](mailto:noreply@feedback.planningportal.nsw.gov.au)  
**To:** [DPE Energy and Resources Policy Mailbox](#)  
**Subject:** Webform submission from: Revised Large-Scale Solar Energy Guidelines  
**Date:** Wednesday, 23 February 2022 8:21:33 PM  
**Attachments:** [arc-submission-on-solar-guidelines.pdf](#)

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Submitted on Wed, 23/02/2022 - 20:19

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Daniel

**Last name**

Boyce

**I would like my submission to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Armidale

**Please provide your view on the project**

I am just providing comments

**Submission file**

[arc-submission-on-solar-guidelines.pdf](#)

**Submission**

Submission from Armidale Regional Council

**I agree to the above statement**

Yes

24 February 2022

Your ref:

Our ref: AO/2022/01312

Matthew Riley, Director – Energy and Resources Policy  
Department of Planning and Environment  
Locked Bag 5022 Parramatta NSW 2124

Dear Matthew

### Armidale Regional Council Submission on the Revised Large-Scale Solar Energy Guidelines

Thank you for the opportunity to provide Council's submission on the Revised Large-Scale Solar Energy Guidelines (Guidelines). Council appreciates the opportunity to provide constructive comments in the finalisation of the Guidelines. Once considered, Council would appreciate the opportunity to meet with DPE and discuss next steps on each of the matters. Council's comments in relation to the Guidelines are provided in the table below:

Section	Comment	Action/Note
1.1. Objectives – page 1	<p>An objective of the Guidelines is to <i>“facilitate better on-ground outcomes by promoting early identification of potential impacts”</i>.</p> <p>It is the position of Council that an essential element of ensuring better outcomes is to:</p> <ul style="list-style-type: none"> <li>• Ensure best practice community engagement (see comments below), and</li> <li>• Ensure that there are material and significant benefits for the communities that host large scale solar projects (see comments below).</li> </ul>	Amend Guidelines to enshrine in them a commitment to best practice community engagement and a commitment to local benefit sharing.
1.3.1. Renewable Energy Zones – page 3	Council requests that more commentary be provided about the local benefits that are to be delivered to the communities of impact that will host the large scale solar projects and a commitment from DPE to ensuring that benefits are not completely “exported” from the host region.	Meeting with Council to discuss follow up and potential actions.
3.Community and stakeholder engagement – page 25	<p>This section is completely lacking in detail.</p> <p>Council expects developers of energy projects to deliver authentic community engagement that goes beyond compliance level requirements and seeks to actively involve community members in the design and</p>	Amend Guidelines to set clear expectations for developers in accordance with Council comments.

	<p>decision-making process of new developments. Engagement should start early in the site feasibility stage and continue through the entire life of the project, including decommissioning.</p> <p>All projects are expected to develop a community engagement strategy that incorporates the following guiding principles:</p> <ol style="list-style-type: none"> <li>1. mutual benefit</li> <li>2. mutual respect</li> <li>3. relationship building</li> <li>4. authenticity</li> <li>5. appropriateness</li> <li>6. ongoing engagement</li> <li>7. transparency and responsiveness</li> </ol> <p>Council requires that developers:</p> <ol style="list-style-type: none"> <li>1. Prioritise face to face engagement activities and employ locally-based community engagement staff as a conduit for direct, open and transparent communications between communities of impact and the executive of relevant development companies and / or their operators.</li> <li>2. Employ a variety of communication and engagement methodologies delivered in tandem and sustained over time, including but not limited to: one-way and two-way communications; 1-on-1 as well as group engagement options; formal and informal options.</li> <li>3. Provide a clear remit for decisions which are open to community input and ideally seek to co-design solutions with communities. Provide transparent reporting on how community feedback has influenced the project.</li> <li>4. Provide transparent reporting on the community benefit deliverables over the life of projects.</li> <li>5. Maintain up to date information on the project stage and avenues for engagement on a project website. Websites should include a means of providing feedback via</li> </ol>	
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	<p>dashboards and similar means, and a clear complaints resolution process.</p> <ol style="list-style-type: none"> <li>6. Have a direct and single point of contact to a staff member who is skilled and knowledgeable on the project and able to respond to community enquiries, questions and concerns in a prompt and reasonable manner. The contact details of this person should be easily accessible from the project website.</li> <li>7. Engage early-on with local businesses, trades and education providers to identify opportunities to collaborate in order to maximise opportunities for local procurement and training/ skills development.</li> <li>8. Be mindful of limited phone and internet connectivity in parts of the region and allow for alternative means of engagement.</li> <li>9. Be mindful of Armidale Region's Climate Emergency Declaration and Zero30 Objectives, and a preference to achieve sustained and lowest cost retail electricity supplies for businesses and residents within the Armidale LGA.</li> <li>10. Be mindful of seasonal agricultural workloads that can create a barrier to participation in engagement activities.</li> <li>11. Be mindful of, and seek to address issues of engagement fatigue and of socio-economic and cultural circumstances which may limit people's ability to engage in community engagement activities.</li> <li>12. Engage with the traditional owners of the Armidale Region through Council's Indigenous Liaison Officer and acknowledged elders and custodians of the Gumbaynggirr, Dunghutti, and Anaiwan lands relevant to each project via the Armidale, Guyra and Dorrigo Local Area Land Councils where appropriate.</li> <li>13. Be mindful of the cumulative impact of multiple energy projects in the region and collaborate with existing and proposed</li> </ol>	
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	<p>projects to streamline or improve engagement outcomes for enhanced social license in the community and assured commercial efficiencies.</p> <p>14. With regard to the establishment of Community Consultative Committees (CCC) or Community Reference Groups as part of a state significant development approval process, developers should:</p> <ul style="list-style-type: none"> <li>• Establish a CCC that maximises opportunities for participation, and has diverse community member representation from host landowners, neighbours and Council as a minimum, and ideally also include members from the wider community and traditional owners as well.</li> <li>• Foster transparent communication by publishing on company project websites, the community engagement strategy and governance structure of the relevant CCC, including minutes of each meeting pertaining to the project.</li> <li>• Understand that a CCC is just one part of a wider community engagement strategy that should be delivered for each energy project. A CCC alone will not create social licence for an energy project in the Armidale region and it is the responsibility of the developer to deliver a diverse, tailored and participatory community engagement strategy.</li> </ul>	
5.4. Infrastructure contributions, benefit sharing and agreements – page 37	<p>Council has grave concerns regarding the prescribed maximum of \$450,000 able to be levied under Section 7.12.</p> <p>A levy of 1% of the capital investment value (CIV) of the project should be required as a starting point in terms of a local contribution.</p>	<p>Enable 1% of CIV to be levied.</p> <p>The Guidelines should include a stronger commitment from the NSW Government to local community benefit sharing arrangements, require it of</p>

	<p>The Guidelines state (at Page 37):</p> <p><i>“While VPAs may be used to administer community enhancement funds with the relevant local council/s, they are not the preferred mechanism to administer these funds.”</i></p> <p>The Guidelines discourage Council from negotiating VPAs as a way to ensure community benefit sharing and appears to suggest that the most appropriate way to manage community benefit sharing is a fund administered by developers. Council does not support this approach and expects that considerable community benefit sharing arrangements should be required of every project.</p> <p>The Guidelines provide no guidance on alternative models for benefit sharing arrangements and set no expectations that developers should be required to enter into discussions in relation to benefit sharing.</p>	<p>every project and provide further guidance on alternative models if the use of VPAs is discouraged. Alternative models should not be under the complete control of developers and should include community and council representation.</p>
5.5.Decommissioning and rehabilitation – page 38	<p>Council strongly supports the following principle in the Guidelines:</p> <p><i>“Land must be rehabilitated and restored pre-existing use, including the pre-existing land and soil capability class if previously used for agricultural purposes.”</i></p> <p>Council requests that rehabilitation plans, with appropriate bonds and rehabilitation funds similar to those applied to extractive industry projects be applied to all SSD renewable energy projects.</p>	<p>Meeting with Council to discuss follow up and potential actions.</p>
Local Benefits	<p>The NENW REZ will be 8GW in size which is approximately equivalent of 57.44 mt CO2 offset. To put that into perspective, Australia’s current CO2 emissions are approximately 528.78 mt CO2 (2020). The NENW REZ will offset almost 11% of Australia’s current CO2 emissions. This is the equivalent of planting around 500,000,000 trees or removing 12.5m cars from our roads.</p> <p>The contribution that the region is making to Australia’s reduction in carbon is nationally significant. This should be recognised and local</p>	<p>The Guideline should commit to the establishment of a REZ Community Benefits fund which will require proponents to make an annual contributions to the relevant Council towards community facility and infrastructure improvements.</p>

	<p>benefits should be provided directly to the community.</p> <p>The Guidelines should clearly identify how the local community will benefit from this offset. Identify benefits to businesses and flag the development of a Future Fund or similar to reinvest into the region from NENW REZ projects.</p> <p>Council also requests that proponents within the REZ provide community benefit contributions to the Council's to support the provision of improved community facilities. Council considers this an appropriate given the benefit that the REZ is providing to NSW and Australia. This process should be via the REZ legislative framework if the use of VPAs is discouraged.</p>	
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I trust that the above comments are of assistance. We look forward to working with DPE in the finalisation of the Guidelines. I can be contacted at [dboyce@armidale.nsw.gov.au](mailto:dboyce@armidale.nsw.gov.au) or on 02 6770 3696 to discuss further.

Yours sincerely

*Daniel Boyce*

**Daniel Boyce**  
**Chief Officer Sustainable Development**

**From:** [noreply@feedback.planningportal.nsw.gov.au](mailto:noreply@feedback.planningportal.nsw.gov.au)  
**To:** [DPE Energy and Resources Policy Mailbox](#)  
**Subject:** Webform submission from: Revised Large-Scale Solar Energy Guidelines  
**Date:** Thursday, 24 February 2022 11:32:18 AM  
**Attachments:** [submission---large-scale-solar-energy-guidelines.pdf](#)

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Submitted on Thu, 24/02/2022 - 11:29

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

David

**Last name**

Carswell

**I would like my submission to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

Queanbeyan 2620

**Please provide your view on the project**

I am just providing comments

**Submission file**

[submission---large-scale-solar-energy-guidelines.pdf](#)

**Submission**

Queanbeyan Palerang Regional Council Submission - Draft Large-Scale Solar Energy Guidelines - February 2022

**I agree to the above statement**

Yes





24 February 2022

Mathew Riley  
Director – Energy and Resources Policy  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

Dear Mr Riley

## **Submission – Draft Large-Scale Solar Energy Guideline**

Thank you for the opportunity to make a submission on the Draft Large-Scale Solar Energy Guideline December 2021. This follows Council's consideration of a report on the Draft Guidelines at its meeting of 23 February 2022.

The Draft Guidelines is accepted as being a comprehensive resource which generally cover all matters that would be expected to be covered in the preparation of Environmental Impact Assessment for a large-scale solar energy project. It is quite a large document and so one suggestion to potentially increase its usage would be to include an Executive Summary. This could include the relevant principles for each section as well as how these should be assessed.

Overall, the Draft Guideline's principles as well as its approaches are endorsed although the section dealing with infrastructure contributions should be altered to reflect Council's endorsed views on these as previously reported to its meeting of 27 January 2022 and reflected in its submission on the Local Infrastructure Contribution Reforms.

These can be summarised as follows:

*If megawatts are to be used as the basis of contributions it is considered that the \$2,000 per megawatt (up to a maximum value of \$450,000) is inadequate and would represent a significant reduction in contributions compared to existing wind and solar establishments throughout NSW at this time.*

*Council was also a party to a joint technical submission on proposed contributions for Wind and Solar Farms prepared and submitted on behalf of it, Hilltops Council, Yass Valley Council, Upper Lachlan Council and Goulbourn-Mulwaree Council. This raised concerns and made six recommendations supported by this Council on the proposed methodology and cap on levying contributions for solar and wind farms through reforms to section 7.12 Plans:*

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ABN 95 933 070 982

1. *Reinstate a Capital Investment Value levy for solar and wind farms (renewable energy) under the Section 7.12 plans under the Environmental Planning and Assessment Amendment (Infrastructure Contributions) Regulation 2021.*
2. *Encourage the use of Planning Agreements as the best approach for solar and wind farms in sharing the benefits of the project with the wider community not just the immediate neighbours.*
3. *In line with recommendation from Atlas Urban Economics s7.12 Reform - Review of Charging Methodology (September 2021), not include nominate units of charge and s7.12 rates that are 'poorly suited to cover' land uses such as solar and wind farms in the Infrastructure Reform.*
4. *Remove the use of a megawatt calculation as it is not based on infrastructure need of projects over the life of the project and is not primarily related to direct delivery of development-contingent infrastructure.*
5. *Remove the maximum levy rate cap as it is not based on infrastructure need of projects over the life of the project and is not primarily related to direct delivery of development-contingent infrastructure.*
6. *Removal of Clause 25U and references to \$2,000 megawatt rate and maximum levy rate under the Environmental Planning and Assessment Amendment (Infrastructure Contributions) Regulation 2021 Clause 25R(c) and 25U:*

Should you require clarification or wish to discuss this submission further please contact David Carswell on 02 62856128 or 0448224260

Yours sincerely,



**David Carswell**  
Service Manager  
Queanbeyan-Palerang Regional Council

**From:** [noreply@feedback.planningportal.nsw.gov.au](mailto:noreply@feedback.planningportal.nsw.gov.au)  
**To:** [DPE Energy and Resources Policy Mailbox](#)  
**Subject:** Webform submission from: Revised Large-Scale Solar Energy Guidelines  
**Date:** Friday, 25 February 2022 4:04:39 PM  
**Attachments:** [220225-revised-large-scale-solar-energy-guidelines---msc-submission.pdf](#)

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Submitted on Fri, 25/02/2022 - 16:03

Submitted by: Anonymous

Submitted values are:

**Submission Type**

I am submitting on behalf of my organisation

## Name

**First name**

Theresa

**Last name**

Folpp

**I would like my submission to remain confidential**

No

## Info

**Email**

[REDACTED]

**Suburb/Town & Postcode**

2333

**Please provide your view on the project**

I support it

**Submission file**

[220225-revised-large-scale-solar-energy-guidelines---msc-submission.pdf](#)

**Submission**

See attached.

**I agree to the above statement**

Yes

**Enquiries**  
**Please ask for** Theresa Folpp  
**Direct** 02 6549 3700

25 February 2022

**Matthew Riley**  
**Director, Energy and Resources Policy**  
**Department of Planning, Industry and Environment**

Dear Matthew,

**Revised Large-Scale Solar Energy Guidelines**  
**Muswellbrook Shire Council Submission**

Reference is made to the NSW Government's 'Draft Large-Scale Solar Energy Guideline' (December, 2021) (Draft Guidelines) developed to ensure the assessment of large-scale solar energy projects is transparent, consistent and supported by better information.

Muswellbrook Shire Council (MSC) staff have reviewed the Draft Guidelines and support the key planning considerations, policy and technical guidance proposed.

The Guidelines will ensure:

- Impacts continue to be assessed with best practice methods and in a consistent manner;
- Effective stakeholder engagement is undertaken that encourages community input on solar energy development; and
- There is a balance between attracting investment and considering the interests of the community whilst avoiding and minimising land use conflicts.

MSC staff specifically welcomes guidelines that set out a clear framework for the following:

- Categories for visual impacts e.g. high impact, moderate impact and low impact;
- Landowner's consent; and
- Agricultural land use conflicts.

Council staff appreciates the opportunity to provide a submission and would be pleased to provide additional information if requested. Should you need to discuss the above, please contact Theresa Folpp, Development Compliance Officer on 02 6549 3700 or email [council@muswellbrook.nsw.gov.au](mailto:council@muswellbrook.nsw.gov.au).

Yours faithfully



**Theresa Folpp**  
**Development Compliance Officer**

3 March 2022



[JP] / [Jared Phillips]  
F2009/01293

NSW Department of Planning and Environment  
Level 16, 4 Parramatta Square &  
12 Darcy Street  
PARRAMATTA NSW 2150

[Kaitlyn.Lieschke@environment.nsw.gov.au](mailto:Kaitlyn.Lieschke@environment.nsw.gov.au)

Dear Kaitlyn

**NSW Department of Planning, Industry and Environment – Revised Large Scale Solar Energy Guideline**

Central Coast Council welcomes the opportunity to provide comment on the NSW Governments Revised Large Scale Solar Energy Guideline.

Central Coast Council (CCC) supports the objectives of the Revised Large Scale Solar Energy Guideline and recognises the NSW Governments objective to achieve net zero emissions by 2050. This commitment to emissions reduction and the utilisation of renewable energy is evidenced in Council's Sustainability and Climate Action Plan (SCAP). Further to this Council has already installed a number of solar panels on Council owned buildings. This has seen overall energy consumption reduced by approximately 1.4GWh annually.

Council would welcome incentives for solar energy providers focused on the use of new technologies that allow solar plants to provide reactive support. This may include some other technologies that utilise solar energy inverters to stabilise the grid. Enabling this would mean it would be easier to control renewable power systems (usually a big challenge with converter-based renewables with no inertia), maintaining a consistent voltage and frequency.

Should you wish to discuss this submission further please contact Jared Phillips Section Manager Centres Planning and Urban Design on [Jared.Phillips@centralcoast.nsw.gov.au](mailto:Jared.Phillips@centralcoast.nsw.gov.au) or on 0439 035 264.

Yours sincerely,

A handwritten signature in black ink, appearing to read "Shannon".

Shannon Turkington  
**Acting Unit Manager Strategic Planning**  
Reference: D15063770



# City of Wagga Wagga

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## Response to the Guidelines Draft Large-Scale Solar Energy Guideline

March 2022

I refer to the draft Large-Scale Solar Energy Guideline and note the reply from the Riverina Joint Organisation which includes Wagga Wagga City Council.

In addition to that submission I would like to emphasise two particular points:

### **1. Light Pollution from Glare**

The guidelines speak to glare caused by solar panels however the provisions are manifestly inadequate. It is clear from the guidelines that for some reason, an amount of glare is an impact that must be suffered by neighbouring residents. For example, a glare event that happens for less than 10 minutes is stated to be low impact.

This position is completely unreasonable and demonstrates no appreciation for the issue or the harm it causes.

Homes that are impacted by glare from the solar farms, even if it is only for 10 minutes a day, suffer light pollution which would not be tolerated by most people.

It is a failing in these guidelines that there is no acknowledgement or reprieve from this issue.

In the field of noise pollution, which is well developed, there are controls around noise impacts above ambient levels.

Why is this same theory/strategy not applied to solar farms and glare?

Rural environments are dark. The levels of ambient light pollution are non-existent. Yet these guidelines don't recognise this and provide no recognition or relief to this extreme impact when solar farms are built.

They should. To the extent that this issue is not addressed it is a failed policy proposal. It should be addressed.

### **2. Contribution to Rural Communities**

The establishment of large-scale solar farms is a business enterprise which benefits urban areas far removed from the local communities impacted by the loss of amenity and loss of productive farming areas caused by the solar farms. A once off contribution to infrastructure and a voluntary community grant program reflects past approaches and is no longer appropriate.

It should be a mandated outcome of these developments that an annual fee is paid to the local authority for the area which suffers the establishment of the development. It is inequitable and unconscionable that some areas of NSW should benefit every year from these developments while the communities which suffer from their impacts receive no benefit.

Please address these failings in the draft document.

Peter Thompson  
General Manager