

30 September 2021

Mt Rankin
NSW 2795

Mr. Matthew Riley,
Director, Energy and Resources Policy
Planning & Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

'CONFIDENTIAL' submission

Dear Sir,

I live at Mt Rankin, a suburb of Bathurst and am forwarding this submission in favor of the proposed amendments to the Infrastructure SEPP.
In particular I refer to the wording under Strategic Justification, an extract of which is below, which mirrors my concerns:

"Consequently, these regional cities are at risk of encroaching renewable energy development which is currently permissible with consent on rural zoned land under the Infrastructure SEPP and requires a connection to the transmission network.

The NSW Government's regional plans identify the need to avoid conflict between existing and potential future uses and require buffers to separate incompatible uses. Consequently, it is important to preserve land on the outskirts of regional cities from potentially incompatible development, such as solar and wind farms, that could preclude growth and development of these cities in the future. Given that there is some flexibility in the location and layout of solar and wind forms, land immediately surrounding regional cities should be afforded additional protections in the planning process.

The proposed amendments to the Infrastructure SEPP would ensure that:

- consent authorities consider land use conflicts in the assessment and decision-making process that may be caused by utility-scale solar and wind farm development near regional cities.*
- land identified for future uses in Regional Plans and Local Strategic Planning Statements is protected from long term use and land use conflicts from utility-scale solar and wind development.*
- regional cities can continue to grow to support ongoing growth and development needs including housing, industrial uses, and infrastructure and services.*

These amendments would apply to land within 10 kilometres of the commercial centre and 5 kilometres from residential land. This would preserve land on the fringe of regional cities for future residential expansion and would provide a buffer to limit any land use conflicts with other important land uses in the commercial centre of the regional cities.

Visual elements and landscape features of these regional cities are also an important contributor to the social and economic value of these areas and provide a vital contribution to the rural character of these areas. This character is important to the identity of the communities and can help strengthen and promote the growth of tourism and the economy.

The natural landscapes surround regional cities can also support the natural environment, create lifestyle and leisure opportunities and sustain productive agriculture.

It is therefore important to preserve any significant landscape qualities, values and features identified by the community, particularly on the entrance to regional cities, to preserve their local and visual characteristics in the face of increasing growth and development.

Solar and wind energy development can have significant visual impacts and the proposed amendments will ensure that any impact on the scenic quality, visual character and setting of regional cities is considered in the assessment process."

Currently there is a proposal by Neoen Australia to build a solar farm covering 500 hectares on "Cangoura", 310 Eleven Mile Drive, Eglinton which basically stretching the full length of Thomas Drive, Eglinton. My understanding is that this location is right in the middle of a corridor which is earmarked for subdivision in the future.

As I stated, I live at Mt Rankin and our property overlooks the proposed site of the solar farm. At present we have a beautiful rural view of Bathurst plains and mountains. This view will change to overlooking an industrial site if the proposal goes ahead. Please refer to photos attached taken from a neighboring property but with the same view as ourselves, showing the current, pristine outlook (attachment 1), and the proposed industrial site (attachment 2).

We moved from Sydney in 1990 and purchased our property to enjoy a rural lifestyle. One of the reasons we purchased the property was to enjoy the magnificent view.

Not only will we lose our view but will also have to contend with glare from the panels which will impact on our health and wellbeing.

Previous developments by Neoen in New South Wales, Victoria, South Australia and Western Australia has been on land that is flat as is shown on pages 4 and 5 of their brochure. None of the previous industrial solar farm developments have been in hilly country nor (as far as I can ascertain) as close to an urban area as that proposed for Eglinton. This type of development should be built further west where the land is more arid and flat hence having no impact on people's lives or agriculture.

The solar farm is proposed to be built on 500 hectares of prime agricultural land which is a waste of productive land.

The solar panel site is not reflective of the nature of the Bathurst landscape so I trust you are able to represent the residents of Mount Rankin and the other Bathurst areas affected to prevent this development from proceeding

Yours faithfully,

A black rectangular redaction box covering the signature and name of the sender.

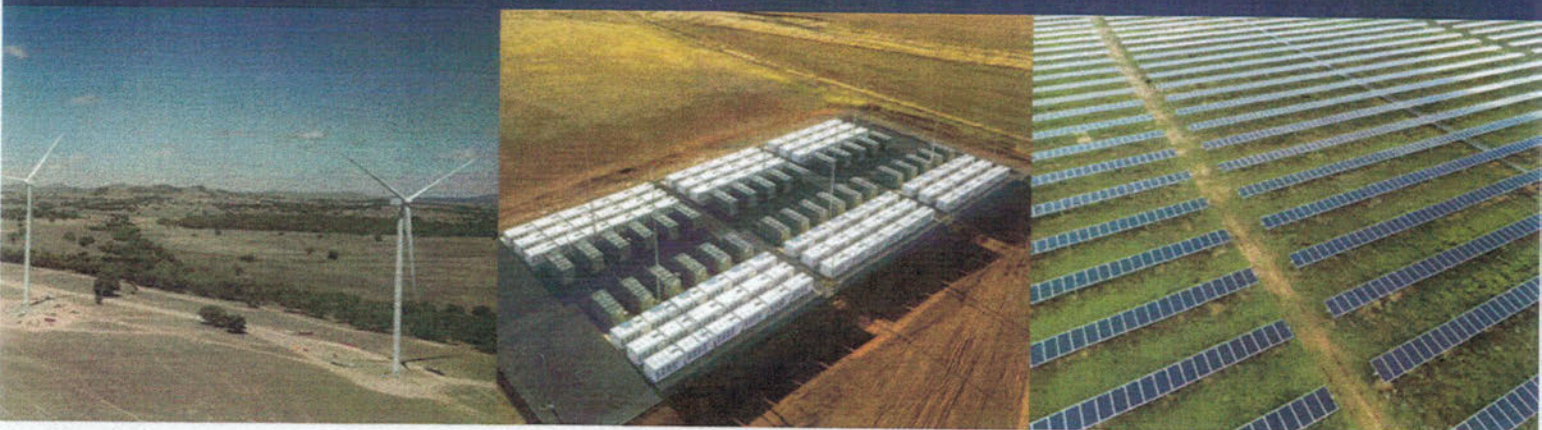
Attachment 1: Current view

Attachment 2: Proposed location of Industrial Solar Farm

Attachment 3: Extract from Eglinton Solar Farm Community Information Brochure





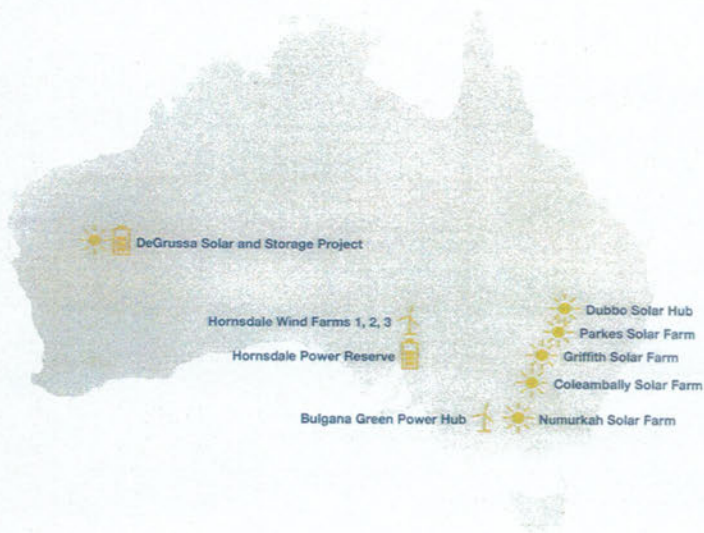


GLOBALLY

The company is headquartered in Paris, France, and has two Australian offices – in Sydney and Canberra.

We operate across renewable energy technologies including solar, wind and storage in Europe, Central America, Africa, the Middle East and Australia

Neoen's total capacity in operation and under construction is currently over 3 GW and we are aiming for more than 5GW by 2021.



LOCALLY

Neoen Australia began operations in 2012. Over the last eight years the company has initiated the development of more than 1GW of solar and wind projects through organic growth, local partnerships and strategic acquisitions.



Neoen produce green electricity from renewable sources such as sunlight and wind using mature, tried and tested technologies. We are also leaders in energy storage.

DELIVERING CHEAPER ENERGY FOR INDUSTRY



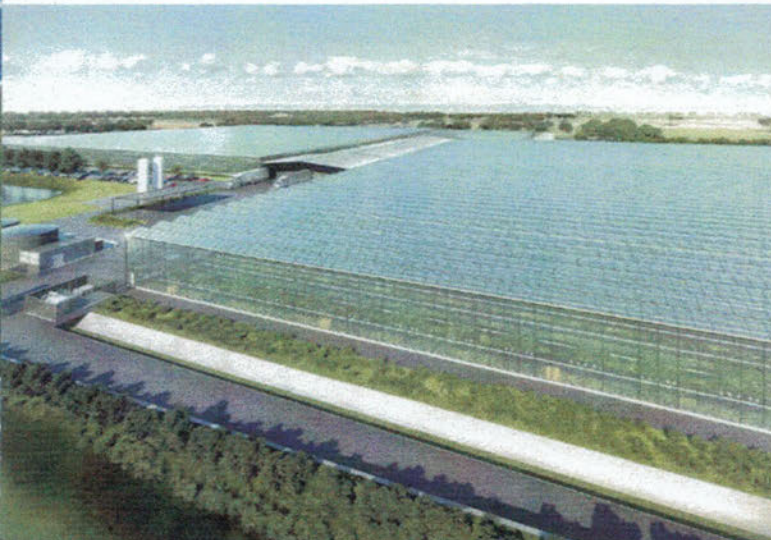
LAVERTON STEELWORKS VICTORIA

Laverton Steelworks have agreed to take power from Neoen's 128 MW Numurkah Solar Farm under a 15-year deal. GFG Alliance's Executive Chairman Sanjeev Gupta said the deal would help lower energy costs at Laverton.



DEGRUSSA MINING WESTERN AUSTRALIA

DeGrussa is the largest off-grid solar battery storage project in Australia. It powers a gold and copper mine in remote WA. Commissioned in June 2016, it provides a solar and storage solution to the majority of the mine's daytime electricity requirements, offsetting up to 20% of total diesel consumption annually.



NECTAR FARMS VICTORIA

Bulgana Green Power Hub, consisting of 196 MW of wind backed by a 20MW battery, is co-located with agribusiness Nectar Farms to provide secure and affordable energy. Nectar Farms is using the latest in hydroponic glasshouse and plant technology to create a 10 hectare state of the art facility and over 130 local jobs.

DELIVERING CHEAPER ENERGY TO RETAILERS



ENERGY AUSTRALIA *COLEAMBALLY SOLAR FARM*

Providing energy output of 100 MW of the 150 MW solar farm for 12 years.



SIMPLY ENERGY *PARKES & GRIFFITH SOLAR FARM*

Providing 100% of the energy output of the two solar farms for 13 years.



Actew AGL *HORNSDALE WIND FARM*

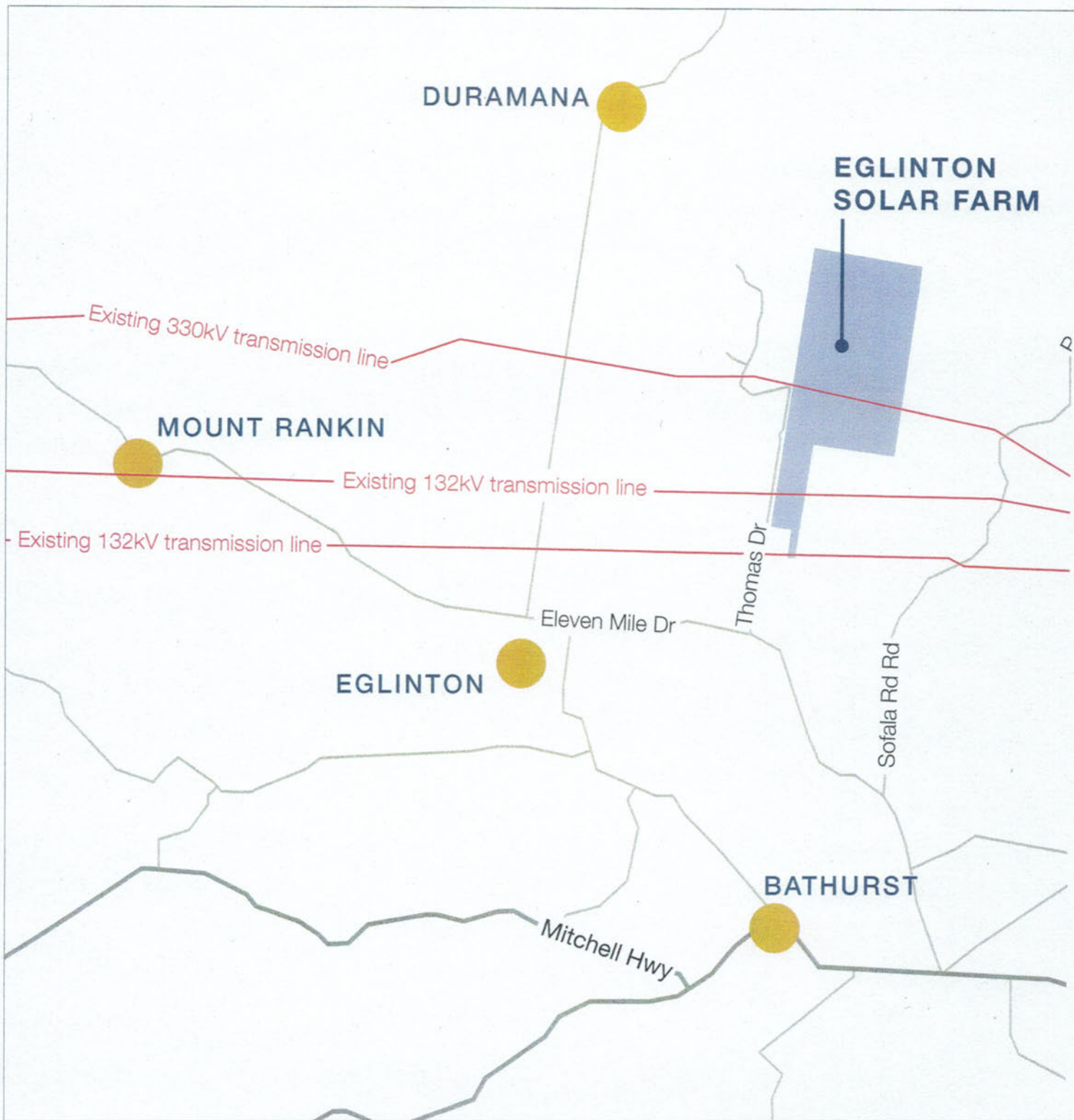
Providing 100% of the energy output of the 309 MW wind farm for 20 years.



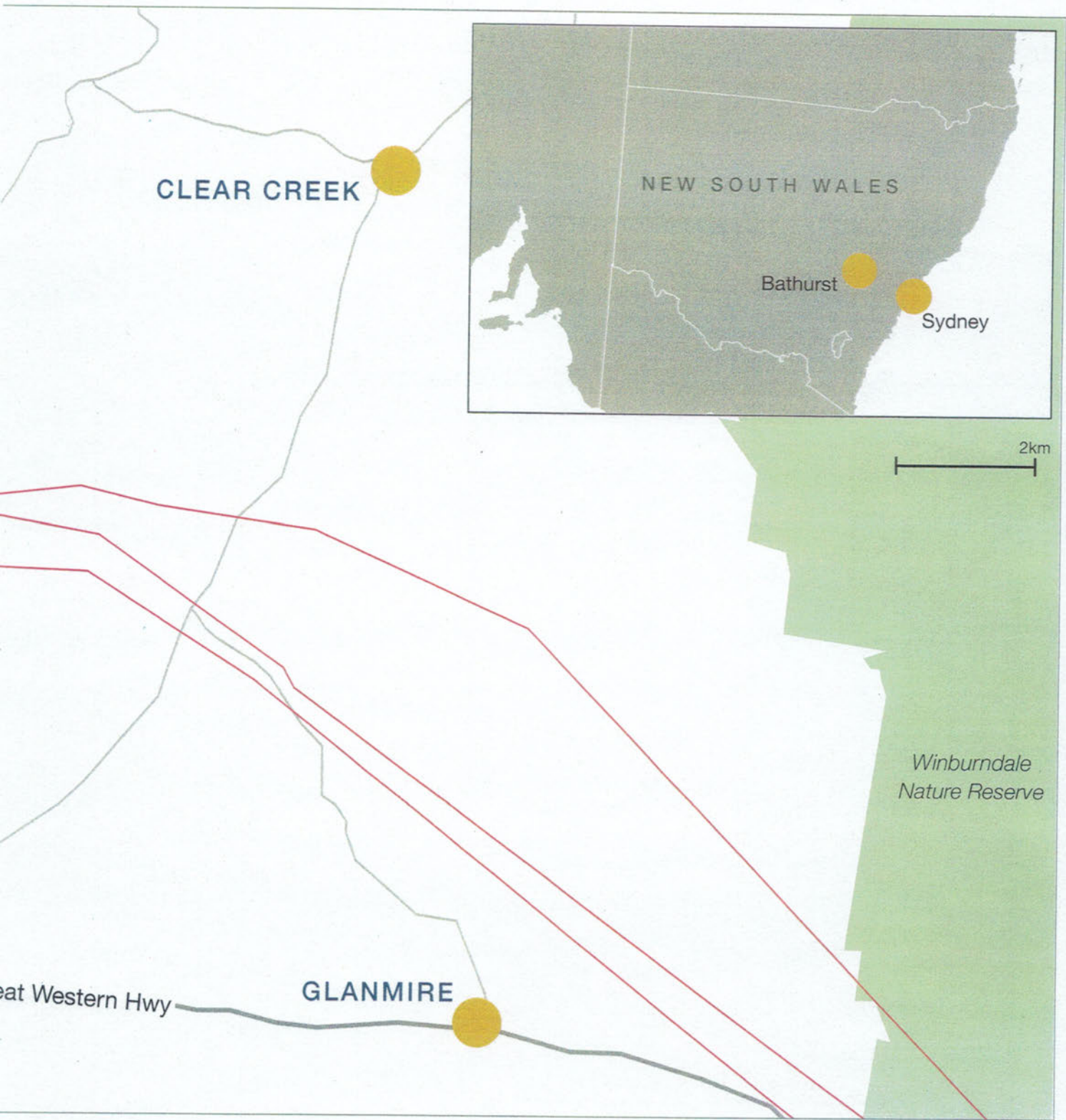
EGLINTON

SOLAR FARM

PROJECT



MAP





Subject: Webform submission from: Renewable Energy and Regional Cities
Date: Sunday, 3 October 2021 11:04:00 AM
Attachments: [support-amendments-sepp---wentworth-estate.pdf](#)

Submitted on Sun, 03/10/2021 - 11:00

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[Redacted]

Last name

[Redacted]

I would like my submission to remain confidential

Yes

Info

Email

[Redacted]

Suburb/Town & Postcode

Bathurst 2795

Submission file

[support-amendments-sepp---wentworth-estate.pdf](#)

Submission

Support of proposed Infrastructure SEPP Amendments... Renewable Energy and Regional Cities.

I agree to the above statement

Yes

Support - Proposed Infrastructure Amendments: Renewable Energy and Regional Cities

We, [REDACTED] welcome the amendments being considered to the SEPP, and agree with the strategic justification for them.

The proposed Eglinton Solar Project, outlined for Eleven Mile Drive Bathurst will have a direct impact on the scenic view from our home at Wentworth Estate. Projects of this scale need more scrutiny on the approved locations.

Renewable Energy Projects, to date, have had few constraints regarding location. These projects are often intrusive, in conflict with other land uses and should be subject to stringent strategic planning considerations.

Solar and wind energy developments have unique visual characteristics that can impact on the scenic qualities of an area.

We fully support the changes to the Infrastructure SEPP- Amendment 1 and 2.

[REDACTED]

[REDACTED]

Bathurst NSW

2795

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 03/10/2021 - 20:33

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Eglinton

Submission

.

I agree to the above statement

Yes

Subject: Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Mon, 04/10/2021 - 10:17

Submitted by: Anonymous

Submitted values are:

Submission Type
I am making a personal submission

Name

First name

Last name

I would like my submission to remain confidential
Yes

Info

Email

Suburb/Town & Postcode
Wolumla 2550

Submission
I Support the Proposed Infrastructure SEPP Amendments 1 and 2: Renewable Energy and Regional Cities.

I agree to the above statement
Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Mon, 04/10/2021 - 10:35

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Wolumla 2550

Submission

I support amendments 1 and 2 to the SEPP - Renewable Energy and Regional Cities

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Mon, 04/10/2021 - 10:39

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Last name

I would like my submission to remain confidential

Yes

Info

Email

Suburb/Town & Postcode

Wolumla 2550

Submission

I support amendments 1 and 2 being considered to the SEPP, and agree with the strategic justification for them.

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Tue, 05/10/2021 - 17:06

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Brewongle

Submission

I would like to support the amendments and the considerations outlined by the EIE.

It is in my view that Utility-scale Solar Energy System in particular would have the undesirable impacts on regional towns and environments in the following ways :

- visual impacts
- contrast with the natural rural environments
- alters the character, atmosphere and scenic quality of rural Australia
- people's enjoyment of the landscape.

Amendments proposed Infrastructure SEPP are fully support to protect regional areas listed.

I am a property owner that has now had three Utility-scale Solar Energy proposals in close proximity to my newly purchased property. Three companies that are not taking into consideration these impacts.

Amendments would greatly assist in preventing and future proposals that are both exhausting and frustrating especially for those living in close proximity to the proposed sites.

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Tue, 05/10/2021 - 18:11

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Mount rankin Bathurst 2795

Submission

I agree with the new SEPP infrastructure amendments in regards to renewable energy projects

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Wed, 06/10/2021 - 17:26

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Kelso 2795

Submission

I strongly support the Infrastructure SEPP and believe it is essential for protection of the future of Bathurst and residents.

I agree to the above statement

Yes

Mr Matthew Riley
Director, Energy and Resources Policy
Planning & Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

2 October 2021

also by email to electricity.roadmap@dpie.nsw.gov.au

Dear Sir,

<https://www.planningportal.nsw.gov.au/ISEPP-renewable-energy>

You have invited submissions to inform the third tranche of regulations for the Electricity Infrastructure Investment Act. Submissions close on 11 October.

On exhibition is your paper “Renewable Energy and Regional Cities”, dealing with proposed changes to the rules for where renewable energy projects can be built. These changes will amend the SEPP (Infrastructure) 2007 to require consent authorities to consider if a proposed development will:

- conflict with existing or approved uses of the land, such as land zoned for residential use
- significantly impact or conflict with land needed to support the growth of a regional city (identified in local and regional strategic plans or on the advice of the relevant council)
- significantly impact the scenic quality and landscape of the regional city

The Explanation of Intended Effect on page 6 defines Electricity Generating Works as including Pumped Hydro, and as including “Electricity Storage”.

Page 5 says “the matters of consideration would apply to land within 10 kilometres of land zoned B3 - Commercial Core, and within 5 kilometres of any residential land zoned R1 – General Residential, R2 – Low Density Residential and R3 – Medium Density Residential.”

My submissions are as follows:

1. The impacts on residential areas, particularly in growing regional centres, is no different from commercially zoned precincts, indeed potentially worse, and so the distance requirement for residential zonings R1, R2 and R3 should be 10 kilometres, not 5 kms.
2. Rural Villages are potentially equally if not worse affected by Electricity Generating Works. The distance requirements should apply to them also i.e. those areas zoned RU5, and they should be protected for 10kms also. They are often an integral part of rural precincts, and those nearer major centres such as Bathurst, and indeed Sydney and the Blue Mountains are becoming ever more desirable for new residences, so space needs to be reserved.
3. The Pumped Hydro Roadmap, on which the whole government policy on pumped hydro electricity storage is based, is **fatally flawed** in two respects:
 - The Pumped Hydro Roadmap is based on topography – places with deep valleys and nearby high mountains, not on the availability of water.

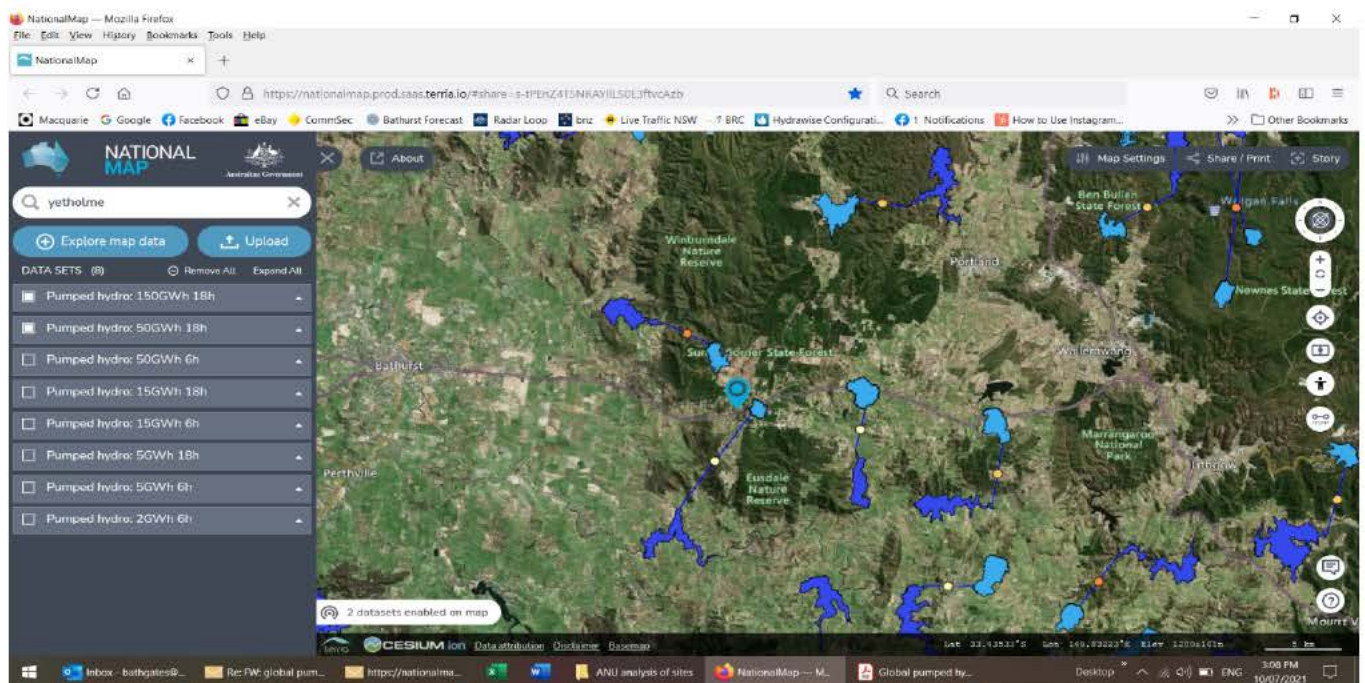
Nowhere in either electricity related Roadmap is a scientific appraisal of the availability of water.

To elaborate, the NSW Government in 2018 invited private enterprise to put forward pumped hydro proposals based on its Pumped Hydro Roadmap, which uses site data developed by the Australian National University. The ANU study over and over stresses that pumped hydro needs to be “off river”. The ANU study is based on topography alone, and has no consideration of the availability of water.

- The NSW Government in 2018 invited private enterprise to put forward pumped hydro proposals based on its Pumped Hydro Roadmap. In that Roadmap Minister Don Harwin was quoted as making the following assertion, without providing any evidence for it ... *“our State is blessed with significant water resources that provide fertile ground for pumped hydro investment”*. The reality is abundantly the opposite - west of the Great Dividing Range there is not an abundance of water, indeed there is a scarcity of water. Those of us who live with drought every few years know this too well.

Therein lies a major concern, namely, that water west of the Great Dividing Range in NSW, and in other dry parts of the continent, is not abundant. It is a scarce strategic asset, and just about every litre of water already flowing west, or stored already in the west, has someone's name already on it. That means that if water is locked for pumped hydro it has to be taken from someone, including the Murray Darling Basin.

Around Bathurst, the ANU study Roadmap identifies many pumped hydro sites which potentially lock away huge volumes of water forever, water that is relied on by locals, farmers, communities and the environment. E.g. illustrated below to the east of Bathurst - these would decimate our local water supply:



My submission is that **only Batteries must be mandated for electricity storage proposed for west of the Great Dividing Range**, except where existing water storages are redundant.

So, unless rigorous public policy is determined for the siting of pumped hydro projects as regards the water needed to service them, large volumes of water needed to store power will be taken forever from inland farmers, communities and the environment.

Yours sincerely,

[Redacted Signature]
 Locksley NSW 2795
 [Redacted Address]

Subject: Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Fri, 08/10/2021 - 09:57

Submitted by: Anonymous

Submitted values are:

Submission Type
I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential
Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode
BATHURST

Submission
We support the Proposed Infrastructure SEPP Amendments: Renewable and Regional Cities

I agree to the above statement
Yes

Subject: Webform submission from: Renewable Energy and Regional Cities
Attachments: wwf-bze-renewable-energy-industrial-precincts-6.pdf
Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Fri, 08/10/2021 - 16:42

Submitted by: Anonymous

Submitted values are:

Submission Type
I am submitting on behalf of my organisation

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential
Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode
Brighton, 3186

Submission file
[wwf-bze-renewable-energy-industrial-precincts-6.pdf](#)

Submission

Equis are a locally based, leading renewable energy developer. Founded in 2010, it has successfully developed over 228 assets in 10 Asia-Pacific countries, including Australia, making it the largest renewables developer in the region at over 11+ GW. We currently employ over 80 professionals across 5 offices in Melbourne, Sydney, Seoul, Singapore, and Tokyo.

We are pursuing a strategy of 'behind the meter' (BTM) solar and battery farms that are integrated with industrial precincts and major energy users across Australia. We are advanced in Victoria and Queensland, where land has been secured and projects are under development. These are called 'Renewable Energy Industrial Precincts', where utility scale solar and battery farms are collocated with existing or future industrial areas, delivering low cost, locally produced, 100% renewable power directly to industry. The solar farms are utility scale but predominantly output their power to local industry, not the grid, through our own electricity cables from the solar farm direct to the industry. The types of industries typically serviced by our locally based solar farm are advanced manufacturing, data centers, food manufacturing and intensive agriculture.

The high cost of laying our own electricity cables means that our solar farms need to be located close to the industrial precincts – say no more than 5km – to be viable.

Accordingly, the proposed Infrastructure SEPP amendments, that look to discourage utility scale solar close to regional cities and towns, present a direct threat to this model. As a result we object to the Amendment 1 – Matters of consideration for utility scale solar and wind, as it currently stands.

Whilst we understand the need to protect growth areas from grid connected solar farms, which do not have to locate close to urban areas, we do not have that luxury and need to be nearby and integrated with towns and cities.

Utility scale BTM solar farms are an emerging trend and receiving significant attention. The supply of cheap, green power is increasingly seen by Government and businesses as a key attraction for new industries and employment generators to locate in NSW. They also help position the area as a leader in renewable energy, sustainability and related technologies, and offer tangible benefits for the community.

Renewable Energy Industrial Precincts are currently being championed by Beyond Zero Emissions, a not for profit environmental organization, who are promoting the Hunter Valley as a location. I have enclosed information from BZE on their model.

A way forward would be to proceed with the proposed amendment but offer a BTM exemption. This could be given effect by Amendment 2 – Standalone Definitions, which could be tweaked to make it clear that utility scale BTM solar farms are not subject to the new matters of consideration, or subject to different matters of consideration.

Should you have any questions, please do not hesitate to contact me on [REDACTED]

Best Regards,

[REDACTED]

I agree to the above statement

Yes



Renewable energy industrial precincts

BRIEFING PAPER — SEPTEMBER 2020

Re-energising Australian Industry

Renewable energy industrial precincts can accelerate the growth of manufacturing in Australia. Beyond Zero Emissions & WWF-Australia, along with partners Energy Estate and IronBark have prepared this briefing paper to explain how renewable energy industrial precincts can promote economic growth and development of Australian industry.

Why do we need to Re-energise Australian Industry?

Australia has suffered an unprecedented economic shock in 2020. The economy is in recession for the first time in almost three decades and the 7% fall in GDP in the June quarter was by far the largest since the Great Depression.

We need to ignite our economic recovery and power up the Australian economy. Re-energising our industry can revive our economy, modernise our industry, reskill our workforce and deliver a bright and vibrant future in existing jobs, as well as emerging industries that offer new opportunities to future generations.

Generating more affordable and reliable energy makes Australia more competitive and renewable energy will be the driver of Australia's future, ensuring that we have both a stronger economy and a healthier environment.

How renewable energy industrial precincts support industry

Australia has always relied on a competitive advantage of affordable and reliable energy but today our intensive manufacturers are at a global disadvantage due to high energy prices. We need to capture the benefits of cheaper renewable power and to capitalise on the opportunity to produce low-carbon products that are increasingly in demand in Australia and internationally. Australia has some of the best and most abundant renewable resources in the world, and this can give Australia's manufacturers a global edge.

Renewable energy industrial precincts support a cluster of manufacturers powered by 100% renewable energy. These precincts are either located within Renewable Energy Zones or connected to renewable energy generation through high voltage transmission lines. They also have access to clean heat and renewable hydrogen production and infrastructure. A renewable energy industrial precinct can be thought of as an expanded Hydrogen Hub as proposed in the National Hydrogen Strategy.



89%

of Australians believe Australia should be manufacturing more products domestically following the COVID-19 pandemic.

Top reasons for wanting more local production are: reducing reliance on other countries (38%), creating jobs (26%), supporting Australian business and industry (26%), safeguarding international supply chains (20%) and strengthening Australia's economy (16%).

Roy Morgan survey, September 2020

What renewable energy industrial precincts deliver?

We must continue to invest in new technologies and to promote greater efficiency in the Australian economy if we are to maintain our standard of living. The future of energy is in cheaper and more reliable renewable power that Australia can develop and harness. Renewable energy industrial precincts will...

- Attract businesses and investors, support local industries, secure existing jobs and create new ones.
- Provide access to cheaper infrastructure and energy (electricity and heat) shared across multiple large energy users will lower power bills and costs for all.
- Provide access to a skilled workforce that is trained in the development and operation of efficient, zero emission industrial processes.
- Provide an opportunity to commercialise new technologies and solutions onshore, by attracting start-ups to co-locate with established industry players.
- Increase the likelihood that energy intensive manufacturers will remain in Australia.
- Become hubs for the development of innovative zero emissions and circular economy technologies and solutions that Australia can sell to the world.

What type of industries will be attracted to these precincts?

- The precincts will be designed for energy-intensive businesses such as aluminium smelting, steel and other metals processing; hydrogen production; chemicals production (e.g. ammonia; caustic soda); recycling and data centres.
- They will secure the presence of existing manufacturers (such as smelters) and attract new ones.
- They could also provide a home for companies making clean technologies such as wind turbines; batteries; electric vehicle chargers; electric buses and mining equipment.

What will attract businesses and investors to these precincts?

- Renewable energy at a guaranteed low price (<\$50/MWh)
- Reliable power supply ensured through a combination of storage and flexible demand programs
- Critical infrastructure, including:
 - Transmission connections to the closest Renewable Energy Zone
 - Hydrogen production and pipelines and a shared industrial heating network
 - Water, waste and recycling
 - Connections to port, rail and road logistics.
- Skilled labour and training programs tailored to the needs of the precinct.
- Streamlined planning and approval processes
- Financial incentives such as interest-free loans.

What needs to happen to set up these precincts?

- Construction of renewable energy zone and connection to precinct.
- Plan for achieving a reliable, balanced electricity system. This will include some combination of energy storage, flexible demand, shared industrial heat and hydrogen production.
- Set up finance models and contract arrangement suitable for both sellers and buyers of energy.
- Progressive implementation over several years – see proposed 5-year phasing in Appendix A.

Where could these precincts be located?

Renewable energy industrial precincts will be located in regional Australia in existing industrial areas with supporting infrastructure such as transport connections (port, rail and road), brownfield land and technically-skilled workforce. A potential precinct in the Hunter Valley is described in Appendix B and other potential locations are:

Bell Bay, TAS	Hunter Valley, NSW
Collie, WA	Port Kembla, NSW
Gladstone, QLD	Portland, VIC
Kwinana, WA	Townsville, QLD
Latrobe Valley, VIC	Whyalla, SA

What government support is needed?

- Announce the concept of Renewable Energy Industrial Precincts and commission a roadmap to establish several precincts around Australia.
- Financial incentives for manufacturers (on the condition of using only renewable energy), e.g. R&D support, funded pilot projects, and cheap access to infrastructure.
- Underwrite the renewable development needed to supply the precincts by guaranteeing developers a minimum price for their electricity output (in return for a cap on cost of electricity).
- Government-led development ensuring strategic land use and infrastructure planning and co-ordination of precinct development in line with local social, economic and environmental needs
- Streamlined planning and approval processes.
- Tailored investment in any required new infrastructure or infrastructure upgrades.

Phasing the development of Renewable Energy Industrial Precincts

The following provides an indicative list of activities that would likely need to occur over the next five years to establish a number of renewable energy industrial precincts.

Year 1

- Support an existing industrial customer to move to renewable energy (anchor customer)
- Help fund (matching funding and investment) a renewable hydrogen pilot project in the precinct
- Undertake an infrastructure scoping study – identify what additional infrastructure will be required
- Stakeholder mapping and engagement – understanding the existing businesses and their needs, investment opportunities, the community needs and concerns, existing training and innovation capability
- Renewable Energy Zone development – ensure a nearby REZ is under development and has sufficient capacity to power the renewable energy industrial precincts
- Identify financial, planning and regulatory incentive options and models.

Years 2-3

- Create new jobs by starting the construction of new infrastructure, such as a heating network, transmission upgrades and battery storage
- Undertake an Expression of Interest process to identify businesses and start-ups that would like to set up operations in the precinct and investors who would like to invest
- Establish an innovation incubator attracting R&D, commercialisation and start-ups to the precinct
- Provide funding for new training programs targeting clean energy and low emissions manufacturing
- Scale the number of existing industrial customers in the precinct starting to use renewable energy
- Scale the production and use of renewable hydrogen
- Pilot financing models and implement any necessary regulatory reforms e.g. planning approvals

Years 4-5 and beyond

- New businesses and industry players start setting up in the CEIP
- Infrastructure build, hydrogen scale-up, incubator and training programs continue
- Scale-up any successful incentives programs in the short-term.

Potential Renewable Energy Industrial Precinct in the Hunter Valley

The Hunter Valley has a proud industrial heritage and is one potential location for a Renewable Energy Industrial Precinct. The Hunter Valley's advantages include a skilled workforce, a deep-water port, existing transmission infrastructure and land available for industrial growth.

Manufacturers operating in the Hunter today include Tomago Aluminium, Orica, Molycop, and Infrabuild. However, to remain competitive these businesses need access to cheaper energy. Both Tomago Aluminium and Orica have indicated they may close if their energy costs do not fall.

Figure 1 presents an overview of one possible configuration of a Renewable Energy Industrial Precinct in the Hunter Valley. It is vision of a low-cost energy hub that makes existing heavy industry internationally competitive and supports the growth of new industry. The system is based around Tomago Aluminium, which consumes 12% of NSW's electricity. Its key features are:

Renewable Energy

- Renewable Energy Zone with 2 to 3 GW solar and wind, supplying electricity at a competitive price (<\$50 MWh).
- Guaranteed (firm) supply to Tomago Aluminium smelter of 800-900 MW.

Smelter as a battery

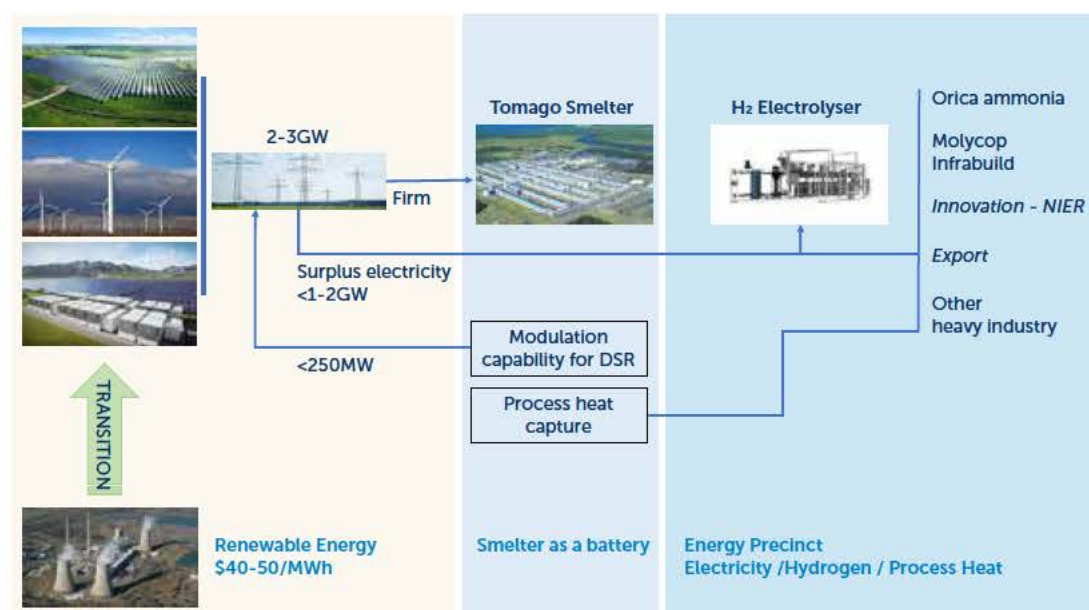
- Modifications to Tomago Aluminium smelter, enabling it to operate more flexibly and provide valuable grid services similar to a battery. These services would create an important new source of revenue for Tomago.

Renewable hydrogen

- Excess electricity used by Orica to power an electrolyser to make hydrogen (for ammonia).
- Other local manufacturers (such as Molycop and Infrabuild) use additional excess electricity and waste heat from Tomago.

The technical and economic details of this system would need to be assessed in a feasibility study. But in principle, this plan could be largely funded by the private sector, with modest government support.

Figure 1: Potential configuration of a Renewable Energy Industrial Precinct in the Hunter Valley.



Beyond Zero Emissions is an internationally-recognised energy-solutions think tank, showing through independent research how Australia can thrive as a zero-emissions economy.

Beyond Zero Emissions' *The Million Jobs Plan* highlights the role that zero carbon initiatives can play in Australia's economic recovery. *The Million Jobs Plan* proposes nation-building, transformative projects that can revive our economy, modernise our industry, reskill our workforce and deliver a bright future.

Our plan will create jobs around Australia including the places where traditional heavy industry has gone, droughts and fires have ravaged the agricultural sector, unemployment is high and long-term employment opportunities have diminished.



With over five million supporters and a global network active in more than 100 countries, WWF is one of the worlds largest and most experienced conservation organisations. WWF-Australia has for the past three years been identified as most trusted environment NGO.

For decades WWF has run programs to accelerate the uptake of clean energy solutions.

WWF's Renewable Recovery campaign is working to create jobs and future-proof our economy. A renewable recovery would bring manufacturing back to our shores, grow existing industries, unlock new industries and help Australia emerge from this crisis as a renewable energy superpower in a post-COVID world.

For more information
about making this happen,
please contact:

Michael Lord,
Lead Researcher
Beyond Zero Emissions

0402 904 465
michael.lord@bze.org.au

Nicky Ison,
Energy Transition Manager
WWF-Australia

0402 0345 80
nison@wwf.org.au



Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 12:49

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

Last name

I would like my submission to remain confidential

Yes

Info

Email

Suburb/Town & Postcode

Duramana 2795

Submission

I Support Proposed Infrastructure

SEPP

Amendments : Renewable and Regional Cities

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 12:58

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Bathurst 2795

Submission

Support- Proposed Infrastructure SEPP Amendments: Renewable and Regional Cities

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 13:00

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Bathurst 2795

Submission

"Support - Proposed Infrastructure SEPP Amendments: Renewable and Regional Cities

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 13:01

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Bathurst 2795

Submission

"Support - Proposed Infrastructure SEPP Amendments: Renewable and Regional Cities

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 13:02

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Bathurst 2795

Submission

"Support - Proposed Infrastructure SEPP Amendments: Renewable and Regional Cities

I agree to the above statement

Yes

Subject: Webform submission from: Renewable Energy and Regional Cities
Attachments: rob-stokes-4.10.2021-(23055).docx
Follow Up Flag: Follow up
Flag Status: Completed

Submitted on Sun, 10/10/2021 - 13:18

Submitted by: Anonymous

Submitted values are:

Submission Type
I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential
Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode
Kiama Heights

Submission file
[rob-stokes-4.10.2021-\(23055\).docx](#)

Submission

I have read Peter Hennessy SC's letter to Mr Robert Stokes dated 4.10.21.

I enclose a copy.

In summary your Government's proposal's document, rightly aims to protect our Regional Cities and their stated qualities. It is entirely appropriate, and I suggest far more certain, and better for peoples' health and wellbeing, if your Government legislates to achieve what it says it wants to achieve.

1 I welcome any amendment that places greater emphasis upon the matters your Government has set out in the EIE.

Thank you for accepting my reply

2 I suggest however the proposed amendments would be more likely to achieve your Government's goals if your Government—

a) Prohibits Proposals within the distances of 10kms and 5kms you have fixed upon.

Allows a Proponent however, to apply for leave to lodge a proposal in 'special or exceptional' circumstances, such as the Regional Council, the impacted Community and a Proponent, all agreeing.

And

b) In respect of all proposals outside the distances of 10kms and 5kms that your Government has nominated, the Consent Authority ought to be required to have regard to all of those matters you have specifically listed in your EIE, in pages 7 and 8.

I agree to the above statement

Yes

Peter and Denise Hennessy
"Adelong Park"
457 Brewongle Lane
Glanmire NSW 2795

Mob 0414375565

04 October 2021

The Hon Robert Stokes MP
Minister for Planning and Public Spaces
GPO Box 5341
Sydney NSW 2001

By email: Pittwater@parliament.nsw.gov.au

Dear Sir,

Re: Proposed Infrastructure SEPP Amendments: Renewable Energy and Regional Cities –
September 2021

Introduction

- 1- I am a member of "Glanmire Action Group". Our group was formed some months ago to oppose a solar proposal by Elgin Energy Pty Ltd at Glanmire.

In 2017, I was a member of "Brewongle Action Group" formed to oppose a solar proposal by Photon. The Group recently dispersed when Photon withdrew, but more recently the Group reformed due to a further solar proposal on the same site, but by an alternative proponent, "First Solar". All proposals are on 500 acres of Cultivation land. Glanmire is within 5kms of residential land. Brewongle is just outside, I understand, 5kms of residential land.

- 2- I am writing to you because our Local State MP The Honourable Paul Toole suggested in July 2021 that I write to you, and I did so by email dated 16th July. I refer you to my email. Thereafter I was contacted by a Mr Clay Preshaw, Executive Director, Energy Resources and Industry Assessments, and had a most helpful and informative discussion with him.
- 3- More recently, The Honourable Philip Donato MP for Orange, gave you credit. He confirmed your willingness for listening and exercising good judgement.

4-I now reside at my rural property located as above. My property is a few kms away from the proposed Glanmire and Brewongle sites. I am however intensely interested in Bathurst, the community and the land. I have been involved in these solar issues to assist the local community/neighbours.

5-I have read with interest the Department's "Proposed Infrastructure SEPP Amendments: Renewable Energy and Regional Cities" document "Explanation of Intended Effect" "EIE" September 2021.

6- I appreciate the expressed justification for the proposed amendments. Your Government expressly –

- A) Identifies the need to avoid conflict between existing and potential future regional uses on the one hand, and renewables on the other, and identifies the requirement of buffers to separate those two incompatibles.

In the case of Bathurst, we have "Bathurst Regional Environmental Plan 2014".

- B) Acknowledges the importance of preserving land on the outskirts of regional cities from potentially incompatible development
- C) Acknowledges renewables can have significant visual impacts and can contrast with the natural environments ... and can "alter the character, scenic quality and people's enjoyment of the landscape".

and

- D) Acknowledges that flexibility exists for the location of renewables;

and so purports to afford additional protection in the planning process, to land within 10km of the commercial centre, and 5km from residential land, by ensuring, by amendments to the Infrastructure SEPP, that the Consent Authorities consider such matters. (See pages 7 and 8)

The motivation for the proposed amendments, as already observed, is the protection of the qualities of our Regional Cities.

Another worthy motivation, is the protection of our, 'Cultivation', quality land, but this, it seems, must wait for another day.

7- The Issues

- A) I welcome any amendment that places greater emphasis upon the matters your government has set out in the EIE.

In reality, the amendments territorially, though significant, are modest indeed. In fact the 10km distance has minimal relevance, whereas the 5km distance, does do some work.

- B) The fact is that the matters for consideration broadly outlined in Section 4.15 of the EP&A Act and touched upon in the four bullet points on page 4 of the EIE, well and truly cover the more specific matters outlined on page 7 of the EIE.

Yet the combination of the Planning Authority with its charter; prospective proponents often foreign to regions, the community, and indeed often from another country, and motivated by money; and communities that have historically had the protection of their regional plans – has resulted in huge adverse health and other community impacts.

- C) Unless there is a clear distinction between the treatment of proposals within the 10km and 5km distances, compared with proposals outside those distances, there is a risk the “Acts Interpretation Act,” in particular the principle “The expression of one thing excludes others”, might result in those more specific matters detailed for consideration within the 10km and 5km distances, being regarded as irrelevant to proposals outside those distances.
- D) Further your Government is, I suggest asking a lot of prospective proponents. If, indeed your Government’s ask is not heeded then your Consent Authority is likely to be as busy as ever, giving due process to applications that your own Government identifies as being territorially mislocated, and perhaps more importantly your Government’s Regional communities are likely to have to live with the misguided intrusion and to be as adversely impacted as ever.

The opportunity your Government now has to truly protect as least some regional communities will have been lost.

- E) There seems to me, to be no limit to the lengths prospective proponents will go in the quest for financial reward.

In the case of Glanmire, the land is classified as “Cultivation land” by the New South Wales Department of Agriculture, and it has been appropriately producing crops/grain probably since 1823, as well as being grazed and yet the current proponent seeks to establish it has been erroneously so classified.

- F) Insurance issues are not understood by proponents, let alone addressed by them, and insurance issues are not I understand matters for the Consent Authority to consider in any depth. Insurance issues have the potential to in fact shut down neighbouring rural activities.
- G) The money motivation for a potential proponent is clearly tempting, and that motivation and temptation is, I suggest, likely to continue. All that is additionally needed is a money motivated owner, who is not interested in the region, the community or otherwise. Such people exist. The absentee Glanmire owner readily admits to being such a person.

- H) A Solar company having another attempt at Brewongle, after several others declined, highlights the difficulties of separating the dog from the bone.
- I) Please exercise control to achieve the territorial result to which your Government's proposed amendments aspire.

8. Please take a greater step forward to avoid inappropriate intrusions.

9. With all the issues your Government has outlined in the EIE, surely it is appropriate to draw a real distinction between what can happen inside the 10km and 5km distances and what can happen outside those distances.

I suggest therefore that your Government;

1 – Prohibit proposals within the distances of 10km and 5km you have fixed upon. Except as outlined in the following paragraph.

Referring to the preceding paragraph it is, I suggest, the exception that makes the rule a good one. It is, for example, appropriate that a prospective proponent be allowed to pursue a proposal "with the leave of the Consent Authority" or, "in special circumstances as found by the Consent Authority". The Government may fix upon such terminology as it thinks appropriate. One can for example foresee a situation where a regional Council, the community and a proponent all support a proposal. Proposals ought not therefore be totally prohibited.

2 - In respect of all proposals outside the distances of 10kms and 5kms that your Government has fixed upon, and in relation to the Regional cities your Government has nominated, the Consent Authority ought be required to have regard to all of those matters you have specifically listed in your EIE at pages 7 and 8.

10 – **Conclusions**

- A) I welcome any amendment that places greater emphasis upon the matters your Government has set out in the EIE.
In the ideal world, the Government ought, I suggest, also exclude proposals on "Cultivation land" as so described by New South Wales Department of Agriculture. I accept, however the motivation for these proposed amendments is the protection of the qualities of our Regional Cities, rather than the protection of our higher quality land. This must therefore wait for another time.
- B) Your Government ought, I suggest, prohibit proposals and regulate proposals, as outlined in 9 above.
- C) I suggest the above may be easily achieved by;
 - i) Including all of pages 1,2,3 and 4.
 - ii) Change "matters of consideration" to "matters for consideration".

- iii) As to page 5 – paragraph 2, delete “within,” wherever it occurs and insert, “outside”.
- iv) Prohibit proposals within the distances of 10km and 5km that you have fixed upon. Except “with leave” or in special circumstances etc. as outlined above.

D) I would also welcome any amendment that protects this State’s limited quantity of quality productive land, in particular Cultivation land. If climate change is real, and I expect it is, then this resource will become even more important than it currently is, and most certainly deserves your Government’s protection.

Thanking you,

Yours Faithfully,

Peter Hennessy



Subject: Webform submission from: Renewable Energy and Regional Cities
Date: Sunday, 10 October 2021 9:14:40 PM
Attachments: [support-of-amendments-1-and-2- 0.pdf](#)

Submitted on Sun, 10/10/2021 - 21:11

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

Shannon

Last name

Rendall

I would like my submission to remain confidential

Yes

Info

Email

[Redacted email address]

Suburb/Town & Postcode

Eglinton 2795

Submission file

[support-of-amendments-1-and-2- 0.pdf](#)

Submission

Please see the uploaded file in support of Amendments 1 and 2 to the SEPP - Renewable Energy and Regional Cities.

I agree to the above statement

Yes

[REDACTED]
[REDACTED]
[REDACTED]
Eglington
NSW
2795

Mr Matthew Riley
Director, Energy and Resources Policy
Planning & Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Riley,

Proposed Infrastructure SEPP Amendments: Renewable Energy & Regional Cities (Sept 2021).

We fully **support** the SEPP amendments being adopted in relation to Renewable Energy & Regional Cities, and agree to the strategic justifications.

Renewable Energy Projects, to date, have had few constraints regarding their location and should be considered foremost for the designated Renewable Energy Zones as outlined in the REZ Roadmap.

These amendments to the SEPP will ensure the protection of the visual character and the expansion and growth of the regional cities listed.

I would hope these amendments, if adopted will be implemented immediately before any more inappropriately sited industrial solar and wind are submitted, particularly those outside the designated Renewable Energy Zones.

Generally, these projects are often intrusive, in conflict with other land uses and should be subject to stringent strategic planning considerations.

- their proximity to residential areas and restrictions on future *development for other purposes*, especially in proximity to regional towns or cities which are becoming more and more attractive as places to live and work.
- we support the development of utility-scale solar and wind projects in areas that will not have a significant impact on the scenic qualities of a landscape. These amendments will ensure the protection of the visual character and setting of our regional city, or that it will be at least considered in the assessment process.

We are in favour of renewable energy but object to any massive infrastructure that will destroy the visual amenity of our town.

The proposed Eglinton Solar Farm on Eleven Mile Drive Bathurst, is such that it is insensitive to the residents of Bathurst. Department of Planning guidelines recommend negating the visual impact on neighbours, usually through tree planting. But because of the topography of this site, with neighbouring homesteads and Estates overlooking Cangoura from hilltop vantage points, this is near impossible.

Our main concerns are:

- The loss of prime agricultural land which, as climate change continues, will be vital for food security,
- The impact on the environment, Aboriginal and cultural heritage,
- The environmental impact on the East Saltram Creek catchment area and the problems that will occur in the Eglinton village and Eleven Mile Drive flooding as a result
- The visual impact on rural vistas, both for neighbouring properties and for those on the higher parts of the City of Bathurst
- The effect on the town planning policy outlined in the recently released LSPS 2040 vision statement for Bathurst.

While many of us contemplate our world's future regarding climate change and most people – including my family support a future based on renewable energy, renewables must be in the right place to ensure maximum efficiency, continued food security and quality of life.

We thank you for reading our letter and hope that should these amendments be adopted; they are implemented immediately.

Kind Regards

[REDACTED]

Eglinton Solar Project Action Group



Mr Matthew Riley
Director, Energy and Resources Policy
Planning & Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Support - Amendments 1 and 2

Title: Proposed Infrastructure SEPP Amendments: Renewable Energy and Regional Cities

Submission by Eglinton Solar Project Action Group – Eleven Mile Drive Bathurst concerning the proposed solar development – Eglinton Solar Farm SSD-8994273

Group Statement

The Eglinton Solar Project Action Group was formed in 2020 by concerned residents in reaction to the proposed development of a large scale solar project on the edge of the regional city Bathurst NSW at Cangoura Beef Farm. We have had the overwhelming support of our objection to this SSD, proposed to be in the vicinity of residential location Eglinton (R1), Laffing Waters Estate (R1) and the commercial centre of Bathurst (B3).

Our private group has **198 followers** supporting our objection to this solar project and a petition with **284 signatures**.

Our group is not opposed to renewable energy but believe that this large scale project would be better suited to an area less densely populated and with less impact on the scenic quality and landscape of our regional city Bathurst.

Hence our full support of the Proposed Amendments to the Infrastructure SEPP - Renewable Energy and Regional Cities.

Support – Amendment 1

The matters of consideration would apply to land within 10 kilometres of land zoned B3 – Commercial core, and within 5 kilometres of any residential land zoned R1, R2 and R3.

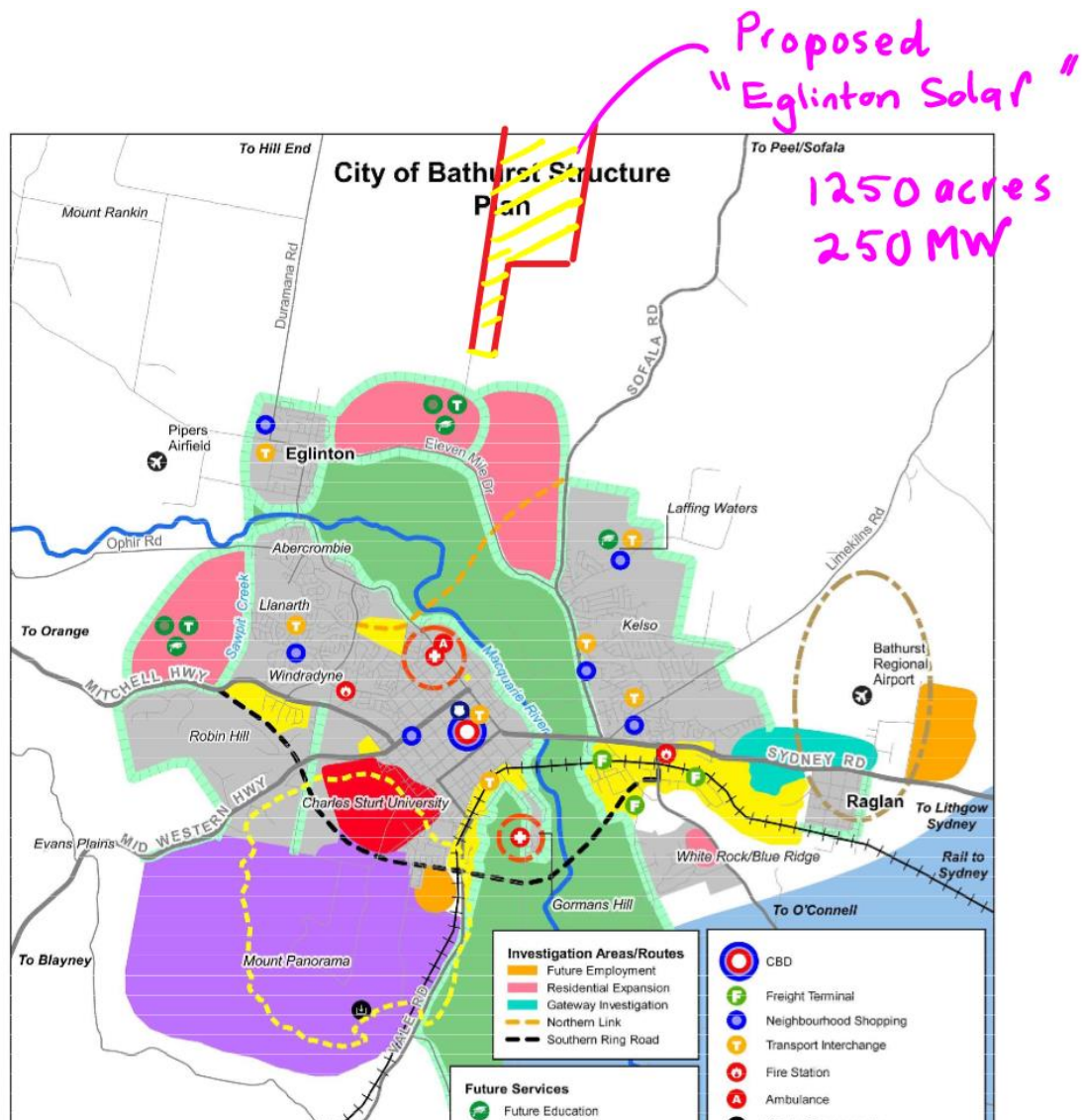
- Our group supports the consideration of future utility-solar and wind developments to avoid land-use conflicts with existing and approved uses of land.
- Currently zoned RU1, this proposed site has been farmed successfully for many generations and is considered sustainable, productive agricultural land. This land provides a natural landscape surrounding the Bathurst regional city.

- The proposed Eglinton Solar Farm would have a significant impact on the expansion and growth of the regional city Bathurst. Bathurst City Council's – Vision Bathurst 2040 Bathurst Region Local Planning Statement – (*Figure 3 on page 21) indicates the future expansion of our Regional City in the next 20 years. Given this, it would suggest, with the proposed solar farm, a conflict to the LSPS and prevent expansion and growth of Bathurst City.
- Our group supports the development of utility-scale solar and wind projects in areas that will not have a significant impact on the scenic qualities of a landscape. These amendments will ensure the protection of the visual character and setting of our regional city, or that it will be at least considered in the assessment process.
- This land provides a natural landscape, providing scenic views to a large portion of residential estates in the region. It includes 34 sensitive receivers within 2 kilometres and R1 zones within 5 kilometres.
- Bathurst City residents that would be affected, with direct views, are Wentworth Estate, Llanarth, Windradyne Estate, Eleven Mile Drive, Mount Rankin, Duramama Road, Eglinton, Abercrombie Estate, Bathurst Hospital also Mount Panorama. Page 53 of the Scoping Report shows an example of the view from Mount Panorama, overlooking residential and the commercial core of Bathurst, which is significantly closer to the project.
- We support the change in the SEPP to include the exclusion of utility-scale solar within the boundaries of 10 kilometres of land zoned B3 – Commercial core, and within 5 kilometres of any residential land zoned R1, R2 and R3.

Support – Amendment 2

- Our group welcomes the change to the "Electricity generating works" standalone definitions of utility-scale solar and wind.
- This will clearly identify the differences between utility-scale solar and other electricity-generating works.

- *Figure 3 Annotated.





Subject: Webform submission from: Renewable Energy and Regional Cities
Date: Sunday, 10 October 2021 4:33:52 PM

Submitted on Sun, 10/10/2021 - 16:32

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[Redacted]

Last name

[Redacted]

I would like my submission to remain confidential

Yes

Info

Email

[Redacted]

Suburb/Town & Postcode

Eglinton NSW 2795

Submission file

[Redacted].pdf

Submission

Support Amendments - Renewable Energy and Regional Cities

I agree to the above statement

Yes

[REDACTED]
[REDACTED]
[REDACTED]
Eglington
NSW
2795

Mr Matthew Riley
Director, Energy and Resources Policy
Planning & Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
Parramatta NSW 2124

Dear Mr Riley,

Proposed Infrastructure SEPP Amendments: Renewable Energy & Regional Cities (Sept 2021).

We fully **support** the SEPP amendments being adopted in relation to Renewable Energy & Regional Cities, and agree to the strategic justifications.

Renewable Energy Projects, to date, have had few constraints regarding their location and should be considered foremost for the designated Renewable Energy Zones as outlined in the REZ Roadmap.

These amendments to the SEPP will ensure the protection of the visual character and the expansion and growth of the regional cities listed.

I would hope these amendments, if adopted will be implemented immediately before any more inappropriately sited industrial solar and wind are submitted, particularly those outside the designated Renewable Energy Zones.

Generally, these projects are often intrusive, in conflict with other land uses and should be subject to stringent strategic planning considerations.

- their proximity to residential areas and restrictions on future *development for other purposes*, especially in proximity to regional towns or cities which are becoming more and more attractive as places to live and work.
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Our main concerns are:

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- The environmental impact on the East Saltram Creek catchment area and the problems that will occur in the Eglinton village and Eleven Mile Drive flooding as a result
- The visual impact on rural vistas, both for neighbouring properties and for those on the higher parts of the City of Bathurst
- The effect on the town planning policy outlined in the recently released LSPS 2040 vision statement for Bathurst.

While many of us contemplate our world's future regarding climate change and most people – including my family support a future based on renewable energy, renewables must be in the right place to ensure maximum efficiency, continued food security and quality of life.

We thank you for reading our letter and hope that should these amendments be adopted; they are implemented immediately.

Kind Regards

[REDACTED]

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Sun, 10/10/2021 - 16:35

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

Eglinton 2795

Submission

I support amendments 1 and 2 to the SEPP - Renewable Energy and Regional Cities

I agree to the above statement

Yes



Subject: Webform submission from: Renewable Energy and Regional Cities
Date: Monday, 11 October 2021 7:16:06 PM
Attachments: [submission-to-isepp-amendment.pdf](#)

Submitted on Mon, 11/10/2021 - 19:14

Submitted by: Anonymous

Submitted values are:

Submission Type

I am submitting on behalf of my organisation

Name

First name

[Redacted]

Last name

[Redacted]

I would like my submission to remain confidential

Yes

Info

Email

[Redacted]

Suburb/Town & Postcode

Turner, 2612

Submission file

[submission-to-isepp-amendment.pdf](#)

Submission

Please see attached

I agree to the above statement

Yes

Mr Matthew Riley

Director, Energy and Resources Policy

Planning & Assessment

Department of Planning, Industry and Environment

11 October 2021

Re: Infrastructure SEPP amendments

Dear Mr Riley,

Thank you for the opportunity to respond to the proposed amendments affecting the Infrastructure State Environmental Plan (Infrastructure SEPP).

We commend the NSW Government for amending the Infrastructure SEPP to ensure it aligns with the NSW Government's Electricity Infrastructure Roadmap. Regional towns in NSW are well placed to take advantage of the opportunities that low-cost energy production offers to facilitate regional industrial development and to reduce the pressures under which they now operate. These regional centres could magnify the effect of this environment-related and economically sensible energy initiative by encouraging regional centres to support and facilitate the development of renewable energy power plants as pooled resources that should be managed by, for, and on behalf of, the community. This would also lead to greater regional economic independence and therefore of regional influence in national public life. However, as drafted, we do not believe the proposed amendments contribute to these aims and instead contradict the aims of the Electricity Roadmap.

ITP Development Pty Ltd (ITPD) is a developer of town-scale solar farms in regional Australia designed to match current and future electricity demand. We undertake solar farm landholder engagement, system design, planning approvals, financing, electrical connection approvals and commissioning. ITPD's portfolio includes more than 20 solar farms between 5 and 500 MW currently under development.

Of the cities impacted by the proposed changes, ITPD has sites under development in Albury, Armidale, Bathurst, Dubbo, Griffith and Orange. Moreover, should the policy ever be expanded to include other locations, ITPD more than 20 sites in regional cities across NSW which would also be at risk.

In this response we have focused on three areas:

1. Resources use efficiency;
2. Land use conflicts; and
3. Scenic qualities.

Resource use efficiency

Renewable power generation plants should be sited in or close to regional centres to maximise the efficiency in generation and consumption of electrical energy and reduce the cost for consumers. For this reason, ITP focuses on the provision of generation close to regional cities. Our business relies on

the ability to connect town-scale (5 to 15 MW) solar farms directly to the distribution network. The distribution network originates at the zone substations in regional cities. We can maximally use the existing electrical infrastructure with such developments. Requiring solar farms to be situated more than 5km from zone substations will require significant electrical augmentation or the construction of new zone substations and connection to the transmission network. This additional electrical infrastructure involves a capital cost of approximately \$5 million. For a 5MW solar farm with a capital cost of less than \$10 million, these requirements will render such projects as economically unviable. In smaller rural towns with lower quality electrical infrastructure, solar farms may need to be within 3km of the zone substation to be economically viable. The efficiency gains that have been made by locating generation near to consumption ("embedded generators") is evidenced by the published Distribution Loss Factors (DLF) across the state. These have continued to decline over the last few years as the proportion of embedded generators (including roof-top solar) has increased.

Renewable energy generators that connect to the transmission network, on the other hand, are of a scale that allows for the capital cost of new zone substations. Such generators can be situated with more flexibility along existing transmission lines with less impact on the overall capital cost of such projects.

The proposed amendments will favour mega-projects far away from where the electricity is consumed. Such projects require significant investment in transmission lines to deliver the electricity to where it is consumed. The further from the load (in this case the demand of regional cities) the solar farm is located, the higher the cost of developing and delivering electricity from the solar farm. The cost of such additional infrastructure will eventually be paid for by the community. This would appear to be in contradiction to aim of the NSW Government's Electricity Infrastructure Roadmap to deliver low-cost electricity. Moreover, town-scale solar farms provide greater benefits to regional communities through economic opportunities such as construction jobs and additional revenue from the plant compared with larger scale projects far from regional centres which must instead rely on importing labour and other resources.

The proposed amendments do not appear to appreciate the differences between distribution and transmission networks. The *Large-scale solar energy guideline* cover projects with a capital cost of more than \$30 million. These are generally transmission connected given the scale of the developments. We request that the NSW Government incorporates the proposed amendments into an update of the existing large scale solar guidelines rather than introducing it into the SEPP where it will disproportionately affect smaller scale developments.

Land use conflicts

ITPD is concerned by the proposed changes surrounding land use and does not agree that solar farms create land use conflicts more than any other types of developments.

Solar farms are similar to other forms of primary production and we believe current zoning requirements are sufficient to reduce conflicts. Solar farms are usually restricted to rural land and compliment other primary production activities on these lands. Our developments are usually built on RU1 Primary Production zoned land leased from the owner for the duration of the project's lifetime. Each landholder we contract with is aware of the commitments of the project situated on their land and agrees to the long-term operational contract. This boosts the landholder's income and puts money

directly into the local economy of the regional city next to which the solar farm is situated. Generally, it supplements other agricultural production and ensures income in drought years. This diversification of income improves the resilience of farm enterprises.

In addition, all of ITPD's solar farms are designed to be co-located with sheep. This allows for the land below and between the rows of the solar farm to be grazed and therefore is no different than if the solar farm was not there and the sheep grazed the area. Agrivoltaics is becoming increasingly common around the world and is the co-location of solar farms with other agricultural activities. Rather than removing land from agricultural production, solar farms compliment current agricultural production, diversify farm income and improve the resilience of regional economies.

A number of our solar farm developments include community ownership. This involves members of the community investing in the solar farms and benefiting from returns. This provides an opportunity for the community to be involved in an action that can reduce their carbon footprint and invest in their community. In such cases, it is crucial that the solar farm is located near the city to facilitate community engagement and develop an understanding of the technology.

We note also that the land required to power regional towns is small compared with the land area used for other activities such as housing. Our developments of 5MW require an area of approximately 11 ha and provides sufficient energy for approximately 2150 detached dwellings. The provision of local renewable energy requires approximately 5 square meters of land per household, equivalent to 1% of the land required by each dwelling. With these small-scale renewable energy developments, regional towns throughout NSW can become energy independent, increase local engagement and create employment opportunities with minimal land requirements.

Scenic quality

ITPD does not agree that solar farms create conflict with the scenic quality due to the already stringent requirements surrounding these types of developments. Whilst it is indicated the amendments will not inhibit the permissibility of utility-scale solar developments, it is already becoming increasingly difficult to overcome visual impact requirements and the proposed amendment would only increase this further.

We believe the proposed amendments unfairly segregates solar PV and wind from other types of developments. This is especially relevant because the proposed changes are blanket across all utility-scale generation technologies and sizes, both of which should contribute to different requirements being imposed. We find it hard to understand how wind and solar can be considered similar in term of their impact on scenic quality or why they should be considered a different class of development from other types of developments such as buildings or other agricultural activities.

ITPD's solar farms reach a maximum height of 2.7 metres off the ground, lower than most buildings. There are existing landscaping and screening requirements which ensures the solar farms have minimal visual impact. Furthermore, more than 30% of Australian households have rooftop solar PV installed, totalling 11GW.¹ This suggests many people are not concerned with living near or under solar systems. Utility-scale solar farms are built using the same solar panels and are not different in the visual quality.

¹ Australian Renewable Energy Agency 2021, available [here](#)



Overall, locating energy generation near demand centres creates a resilient and secure electricity supply and provides the lowest cost electricity to the local community. These amendments do not contribute to that goal of ensuring renewable energy projects are built in the right places, but instead hinder it.

We hope the proposed amendments to the Infrastructure SEPP are not implemented and instead are incorporated into an update version of the *Large-scale solar energy guideline*. We are happy to be involved in further consultations on these amendments to ensure the outcomes support the transition to a low carbon future with renewable energy and aligns with both the National Electricity rules and the aims of the NSW Government's Electricity Infrastructure Roadmap.

Yours Sincerely,

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A small black rectangular box redacting the name of the sender.

A black rectangular box redacting the contact information of the sender.

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Mon, 11/10/2021 - 19:28

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

2795

Submission

The property they have selected to locate these solar panels, is very valuable and productive land. The Bathurst region has lost a lot of it's productive land to development. I also believe that this type of development is too close to the township of Eglinton.

I agree to the above statement

Yes

Subject:

Webform submission from: Renewable Energy and Regional Cities

Follow Up Flag:

Follow up

Flag Status:

Completed

Submitted on Mon, 11/10/2021 - 19:18

Submitted by: Anonymous

Submitted values are:

Submission Type

I am making a personal submission

Name

First name

[REDACTED]

Last name

[REDACTED]

I would like my submission to remain confidential

Yes

Info

Email

[REDACTED]

Suburb/Town & Postcode

2795

Submission

I believe the property in question is prime agricultural land. We have lost far too much of it already. Our water catchments and agricultural land should be our priority for our food source.

I agree to the above statement

Yes