

Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025

Submission No:	444
Submitted by:	Somerset Regional Council
Publication:	Making the submission and your name public
Attachments:	See attachment
Submitter Comments:	

20 May 2025

Committee Secretary
State Development, Infrastructure and Works Committee
Parliament House
George Street
BRISBANE QLD 4000

By email: SDIWC@parliament.qld.gov.au

Dear Sir / Madam,

Subject: Submission regarding *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025*

Our Ref: LAND USE AND PLANNING - LEGISLATION - Legislation

Somerset Regional Council (Council) welcomes the opportunity to provide feedback to the State Development, Infrastructure and Works Committee on the *Planning (Social Impact and Community Benefit) and Other Legislation Amendment Bill 2025* (the Bill), with respect to the proposed framework for the assessment of renewable energy facilities.

Council has, like many other local governments, experienced a significant rise in interest for the development of renewable energy facilities, particularly large-scale solar farms and battery storage facilities. The low-density, rural nature of the Somerset region is understood to be an attractive prospect for potential renewable energy development in areas proximity to existing major electricity infrastructure in the Urban Southeast Queensland.

Council's support for the introduction of mandatory State-wide assessment benchmarks for renewable energy facilities is a positive step forward and welcomes the introduction of a State-wide code for large scale solar farms alongside the established State-wide code for wind farms. Notwithstanding, Council provides the following additional feedback for the Committee's consideration:

Battery Energy Storage Systems

Similar to large-scale solar farms, large scale Battery Energy Storage Systems (BESS) have significant social impacts on local communities and built form impacts on the landscape and environment. While it is acknowledged BESS do not generate energy, they are an intrinsic part of the renewable energy system which act as rechargeable batteries and release the stored power when needed. BESS facilities prevent renewable energy wastage while balancing supply and demand and stabilising the overall power grid.

Large scale BESS developments are often an integral part of large-scale solar farms. However, large-scale BESS developments may also be proposed in isolation of solar farms, or in advance of future solar farm development applications. Council foresees

significant inefficiencies (and potential inconsistencies) with integrated BESS facilities being assessed by SARA whilst standalone BESS facilities continue to be assessed by local government.

Recommendation 1: Council recommends large scale BESS developments are subject to the proposed renewable energy facility assessment process, with the introduction of a fit-for-purpose and mandatory State-wide assessment benchmark.

Community Benefit Agreement Framework

While Council is broadly supportive of introducing a Community Benefit Agreement (CBA) framework, Council is concerned with respect of the CBA being a committed and binding legal agreement with Council as a precursor to the lodgement of the development application with the SARA.

The proposed CBA timing appears premature and may suggest a conflict of interest where Council appears to have given its support for a project that, upon the detailed planning assessment, may have matters of non-compliance or require changes to achieve compliance.

Similar to most development Infrastructure Agreements, Council's preference is for the CBA to be only executed once the planning assessment has been carried out and project impacts have been identified, assessed and mitigation strategies developed. This progressive approach would also allow Council to consider matters raised by the community in formal public consultation which may affect the form of the CBA.

Notwithstanding above, Council does see an opportunity for the drafting of the CBA to occur in parallel with SARA's planning assessment to realise process efficiencies.

Council recommends amending the CBA framework to enable for the CBA to occur after the planning assessment is complete.

Assessment of local impacts

Whilst Council supports the State-wide assessment, it is concerned that local impacts are not appropriately addressed within the assessment of the development application. More specifically, Council is concerned how scenic amenity and landscape values are considered as part of a visual impact assessment that protects the amenity of rural lifestyle allotments in Somerset.

For example, approximately half of the rural zoned freehold allotments within the Somerset Region have a lot size that is less than 16 hectares. This smaller lot size means that renewable energy development in the Somerset region is often subject to a greater number of neighbouring properties than larger western rural areas, which makes detailed visual impacts assessments vitally important.

Additionally, the assessment of landscape values should be broadened to consider matters beyond visual amenity. Whilst the definition of landscape values appears broad, the drafting of the proposed performance outcome appears to have the effect

of narrowing the assessment back to visual impacts. With respect of Somerset, a landscape values assessment should include an assessment of land suitable for pastoral and agricultural uses, which are more often the site of these developments within the Somerset region.

Although not related to the Bill, the code also appears to need strengthening with respect of impact of development on water quality within drinking water supply catchments. The Somerset region, home to Lake Somerset and Lake Wivenhoe, is predominantly a drinking water catchment and a main supply of water for greater Southeast Queensland. Under Council's planning scheme, development of this nature requires compliance with the requirements contained within the Seqwater Development Guidelines to ensure that stormwater quality is maintained to the highest standard.

Recommendation 3: Council recommends local planning schemes are considered as part of the assessment of renewable energy facilities, including Council acting as a referral agency.

Finally, Council wishes to express its disappointment in the limited timeframe for consultation on the Bill. As a result of the limited timeframes, formal endorsement from Council has been unable to be obtained prior to submission. As such, this submission has been authorised by Council's Chief Executive Officer and will be presented to a Council Ordinary meeting at a later date.

Please do not hesitate to contact me to discuss any of the aforementioned matters further.

Yours sincerely,



Andrew Johnson
Chief Executive Officer