



**Discussion Paper on Planning for Renewable Energy Generation
Solar Energy**

Australian PV Association
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NSW Department of Planning
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The Australian PV Association (APVA) welcomes the opportunity to comment on the Discussion Paper on Planning for Renewable Energy Generation – Solar Energy. Please find our comments attached.

Yours Sincerely

A handwritten signature in black ink, appearing to read 'Muriel Watt', is placed on a light-colored rectangular background.

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Chair, Australian PV Association

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Encl.



Discussion Paper on Planning for Renewable Energy Generation Solar Energy

Background on the APVA

The APVA is an association of companies, government agencies, individuals and universities with an interest in solar photovoltaic electricity research, technology, manufacturing, systems, policies, programs and projects. In addition to Australian activities, we provide the structure through which Australia participates in an International Energy Agency (IEA) program called PVPS (Photovoltaic Power Systems), which in turn is made up of a number of activities concerning PV performance and implementation. Further information is available from www.apva.org.au and is provided in Attachment A.

Discussion paper Recommendations

The APVA commends the NSW Government on the excellent Discussion Paper on Planning for Renewable Energy Generation – Solar Energy and is generally supportive of its recommendations. However, we would make the following suggestions:

- With regard to the photovoltaic system size permitted under complying and exempt development, the APVA recommends this be increased to 30 kVA. This would be consistent with Australian Standards for PV and allow a 3 phase system with 10 kVA per phase. This would also be in line with size limits set by other States for their feed-in tariff and other policies.
- We note that, under the Renewable Energy Target deeming arrangements, the size limit is 100 kW, so that extending the size limit to 100 kW for all installations should also be considered, as this would facilitate the valuable commercial system market.
- A further requirement be added: *“is installed by an accredited installer, in accordance with Australian installation standards and using products which meet Australian standards”*.
- We note the current wording may exclude small-scale concentrating and tracking solar systems and suggest that guidelines be developed for these, so that they can be included under the exempt and complying rules. Without this, potential customers are unlikely to consider their use, since a DA would be required.

Other comments

Under Section 5: Planning considerations, the APVA would recommend a paragraph be added on Solar Access. This is likely to be an increasingly difficult issue and requires that PV system owners be aware of their rights should a neighbour propose a development which would shade their PV installation in future.

Please find attached a recent APVA Report on PV for Local Governments, which deals with the issue of Solar Access.



Discussion Paper on Planning for Renewable Energy Generation Solar Energy

Attachment A: The Australian PV Association

The objective of the Australian PV Association is to encourage participation of Australian organisations in PV industry development, policy analysis, standards and accreditation, advocacy and collaborative research and development projects concerning photovoltaic solar electricity.

APVA membership provides:

Information

- Up to date information on new PV developments around the world (research, product development, policy, marketing strategies) as well as issues arising
- Access to PV sites and PV data from around the world
- International experiences with strategies, standards, technologies and policies
- Australian PV data and information
- Standards impacting on PV applications

Networks

- Access to international PV networks (PV industry, government, researchers) which allow personal relationships to develop and can be invaluable in business, research or policy development or information exchange generally
- Opportunity to participate in international projects, with associated shared knowledge and understanding
- Opportunity to meet regularly and discuss specific issues which are of international, as well as local interest. This provides opportunities for joint work, reduces duplication of effort and keeps everyone up to date on current issues.

Marketing Australian Products and Expertise

- Opportunities for Australian input (and hence influence on) PV guidelines and standards development. This ensures both that Australian products are not excluded from international markets and that Australian product developers are aware of likely international guidelines.
- Using the information and networks detailed above to promote Australian products and expertise.
- Working with some of the network partners to further develop our/their products/services to an overall better product.
- Using the network to enter into new markets and/or to open new business opportunities in Australia.

The International Energy Agency PV Power Systems Programme (PVPS)

One principal activity of the APVA is to manage Australian participation in the PVPS. This work is arranged by Tasks, each with its own commitments of time and resources. At present Australia participates in:

Task 1 – PV Information Exchange and Dissemination

Task 11 – PV Hybrid Systems within Mini-grids



Discussion Paper on Planning for Renewable Energy Generation Solar Energy

Task 14: - High Penetration of PV in (Smart) Electricity Grids
and is considering:

Task 9 (extension): PV in Developing Countries

Task 10 (extension): PV in Urban Environments

Task 13: - PV System Performance

PV2030

The APVA has developed an 8 point strategy for PV development and deployment in Australia by 2030 and works with all the relevant sectors to achieve the long term aim of a vibrant PV sector in Australia. The Association believes that successful policy support requires a coherent set of long term strategies covering all 8 aspects.



For further information on the Australian PV Association visit: www.apva.org.au

For further information on the IEA-PVPS visit www.iea-pvps.org.