



Consultation Report

Temporary Local Planning Instrument
for Renewable Energy and Battery Storage Facilities

Date of Engagement

11 August 2025 – 1 September 2025

Method of Engagement

Social Media and Public Meetings

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Background

The region has experienced a significant increase in the interest and activity surrounding renewable energy developments, particularly large-scale battery energy storage systems (BESS). Several projects are currently underway, with more proposed, prompting a noticeable shift in land use patterns and raising questions about long-term infrastructure planning, environmental impacts, and community expectations. In light of this emerging development, Council has recognised the need to take a proactive approach to managing these projects. Council resolved on 10 June 2025 to prepare a Temporary Local Planning Instrument (TLPI) under Section 23 of the *Planning Act 2016*, to provide interim planning controls while more permanent policy responses are considered.

“THAT Council:

resolves to prepare a Temporary Local Planning Instrument (TLPI) in accordance with section 23 of the Planning Act 2016; and

Undertake public consultation regarding the proposed TLPI, prior to lodgement with the State Government.”

The *Planning Act 2016* allows local governments to introduce a TLPI to address urgent or emerging planning matters. Given the existing electricity infrastructure in the region, Council has received development applications, and a growing number of enquiries related to renewable energy projects, particularly battery storage.

This TLPI aims to review and strengthen the local planning framework to ensure that:

- The suitability of such projects is carefully assessed, and
- Where appropriate, their impacts can be effectively managed.

While the *Planning Act 2016* does not require public consultation for a TLPI, Council recognises the importance of community consultation, especially in light of concerns raised about renewable energy and battery storage developments. Therefore, Council has proactively engaged with the community to ensure transparency and informed decision-making.

Community Consultation Process

While formal consultation isn't required under the *Planning Act 2016*, Council is committed to transparency and community involvement. Council sought submissions on the proposed Temporary Local Planning Instrument (TLPI) from 11 August 2025 to 1 September 2025. A total of 68 submissions were received during this period.

During the consultation period, there were four public meetings at Gracemere, Alton Downs, Rockhampton and Bouldercombe. These were seen as an effective way to consult with the community, with many members taking the time to seek additional information and clarification around the proposed TLPI.



Images: Public Meetings held at Gracemere, Bouldercombe and Rockhampton

Common Matters Raised in Submissions

The following table contains a summary of the common matters raised in submissions. While not every submission is explicitly referenced, all submissions have been reviewed and considered in the preparation of this report. Individual matters have either been addressed within the grouped themes below or informed broader recommendations and refinements to the TLPI.

In addition, State Government via the TLPI process will be made aware of the concerns raised through this consultation process to ensure they are considered in broader planning and policy discussions.

Submitter Comment	Council Response
<p>Protection of rural amenity and loss of agricultural land</p> <p>Concerns that these types of development may negatively impact rural views and lead to the conversion of agricultural land into industrial land/areas.</p>	<p>The proposed Temporary Local Planning Instrument seeks to protect agricultural land by limiting development on productive agricultural areas and ensuring land use remains compatible with the relevant zoning. The TLPI includes specific provisions to safeguard rural amenity and minimise land use conflicts. This includes the following measures:</p> <ul style="list-style-type: none"> • Appropriate site selection to avoid good quality agricultural land (referenced by the ALC Overlay); • Design considerations that reduce visual prominence and integrate with the rural landscape; • Development setbacks to maintain separation from sensitive land uses and preserve rural character; and • Landscaping and screening to soften visual impacts and maintain scenic values. <p>These measures will aim to ensure that renewable energy developments are sensitively integrated into the rural environment, preserving both the functionality of agricultural land and the visual amenity of surrounding areas. Each proposal will be subject to site-specific assessment under the TLPI and <i>Rockhampton Region Planning Scheme</i> to ensure these outcomes are achieved.</p>
<p>Increase development setbacks</p> <p>Concerns the proposed 2000 metre setback for Battery Energy Storage Systems developments is considered inadequate given the high fire risk and limited local firefighting capacity.</p> <p>Consideration of a significantly greater setback</p>	<p>The proposed development setbacks are intended to balance safety, manage land use impacts and environmental considerations. The concerns regarding fire risk and emergency response capacity will be further considered through site-specific assessments, including bushfire hazard analysis, emergency management plans, and consultation with local fire authorities.</p> <p>The proposed renewable energy facilities and battery storage facilities code seeks to ensure renewable energy facilities are located, designed and operated to protect the safety of the public, avoid environmental harm and nuisance and protect scenic and landscape amenity values.</p>

<p>is recommended to ensure safety and allow timely intervention by first responders.</p>	<p>The proposed code, also requires the development to comply with the following:</p> <p><i>“Battery storage facilities are appropriately located, designed and separated to avoid harm or mitigate the risk of harm to people, surrounding land uses and environmental values by:</i></p> <p><i>avoiding or where unable to avoid, minimise the risks of fire, explosion, thermal emission and containment release on and from the premises;</i></p> <p><i>avoiding or where unable to avoid, mitigate the risks to the use of bushfire (including airborne debris), flood and vehicular impact; and facilitating effective and efficient fire and emergency service response in the event of a fire, bushfire, explosion, contamination leak or other incident triggering an emergency service response.</i></p> <p><i>Note – Development applications should be supported by assessment material such as a risk management plan, fire and bushfire management plan and emergency plan. These plans must be prepared by a suitably qualified and experienced person.</i></p> <p><i>Note—Compliance with this Performance Outcome may be demonstrated by addressing CFA Design Guidelines and Model Requirements for Renewable Energy Facilities.”</i></p> <p>Furthermore, the recent BESS applications that Council have received indicate that each battery container has a liquid cooling system to prevent overheating. The containers also have multiple built-in fire protection devices that work collaboratively, including flammable gas, smoke and thermal sensors, pressure relief system and aerosol fire extinguishing system. Therefore, a container will automatically suppress an internal fire in the first instance.</p>
<p>Decrease development setbacks</p> <p>For the TLPI to have greater credibility, the setback to sensitive land uses should be reduced to 1500 metres as per other toxic industries.</p>	<p>The State Government has provided initial feedback on the proposed development setbacks and has requested that Council reduce them to align with the current State Planning provisions. It recommended that this provision is changed to reflect current industry standards for land use separation.</p>
<p>Livestock Production Assurance (LPA)</p> <p>Concerns property owners won’t comply with the LPA accreditation as they need to consider contamination risks from renewable energy installed on grazing land.</p>	<p>The Livestock Production Assurance (LPA) refers to the consideration of contamination risks from renewable energy installed on grazing. Initial advice from the Integrity Systems Company has advised Council that Battery Energy Storage Systems are not specifically referenced in the Livestock Production Assurance (LPA) rules or standards, nor are they listed on the property risk assessment template.</p> <p>The current LPA guidance refers to renewable energy infrastructure such as solar panels and wind turbines. This may change in the future and the TLPI does contain provisions regarding facilities to be located away from waterways and avoid or mitigate the risk on environmental values.</p>
<p>Noise impacts</p> <p>Concerns with noise impacts on nearby residence and the</p>	<p>The proposed noise requirements for renewable energy developments align with the noise standards under the <i>Environmental Protection Act</i>. These standards are designed to</p>

acoustic measures seem impractical when common AC units operate at 50-70DB at times.	<p>protect residential amenity and are informed by acoustic assessments.</p> <p>Council may also consider additional site-specific conditions to ensure noise levels remain within acceptable limits, particularly in proximity to sensitive land uses. These measures aim to balance the operational needs of renewable energy infrastructure with the protection of community wellbeing.</p>
<p>Visual impacts</p> <p>Concerns these developments should be out of sight from any residential use</p>	<p>The Temporary Local Planning Instrument will ensure visual impacts of renewable energy developments are carefully assessed and mitigated wherever possible. Measures include:</p> <ul style="list-style-type: none"> - Requiring landscape screening and vegetation buffers; - Consideration of amenity and scenic landscape values of the area; and - Encouraging design solutions to reduce visual prominence. <p>These measures are further reinforced through the conditions imposed as part of any development approval.</p>
<p>Sensitive land use definition</p> <p>The definition of sensitive land uses should be expanded to include agricultural work sheds due to their critical role and potential chemical storage.</p>	<p>Schedule 24 of the <i>Planning Regulation 2017</i> defines “sensitive land use” and does not currently include agricultural work sheds.</p> <p>While Council acknowledges the important role these structures play in rural operations, particularly where chemical storage or worker safety is involved. Council notes the intent of the comment and is advocating for broader protection of agricultural land to ensure development is not located on land subject to the agricultural land classification overlay.</p>
<p>Waste management and decommissioning</p> <p>Concerns have been raised regarding the effectiveness of waste management and the feasibility of adequate site rehabilitation following the end of the development’s operational life.</p>	<p>The Temporary Local Planning Instrument requires that sites be rehabilitated to a condition suitable for future uses compatible with the zoning of the land. This may be achieved through a rehabilitation and decommissioning plan that outlines the process, procedures, and timelines for removing all built infrastructure and restoring the land to its pre-development or natural state. The plan must also detail how equipment and materials will be disposed of, reused, or recycled. These requirements are further reinforced through development approval conditions. Council may also require a monetary agreement to ensure that decommissioning and rehabilitation obligations are met, providing additional assurance that the site will be responsibly restored.</p>
<p>Cumulative impacts</p> <p>The issues to cumulative developments in nearby locations does not seem to be addressed.</p>	<p>The draft Temporary Local Planning Instrument has been updated to require a visual impact assessment for sites visible from public roads, public viewing locations, and sensitive land uses. The assessment must also consider the cumulative impact of multiple developments on adjoining and nearby properties.</p>
<p>Bushfire hazard and risk</p> <p>Community concerns have highlighted several</p>	<p>The concerns regarding fire risk and emergency response capacity will be further considered through site-specific assessments,</p>

<p>environmental and safety risks associated with fires at Battery Energy Storage System (BESS) facilities.</p> <p>These include:</p> <ul style="list-style-type: none"> • During fire suppression efforts, water runoff may impact local flora and fauna and contaminate soil, groundwater, and surface water. • Combustion during fires can release harmful air pollutants, posing risks to both human health and the environment. • Fires at BESS sites, particularly those monitored remotely, may escalate rapidly due to high fuel loads, adverse wind conditions, and potential delays in emergency response. 	<p>including bushfire hazard analysis, emergency management plans, and consultation with local fire authorities.</p> <p>The proposed development code, also requires the development to comply with the following:</p> <p><i>“Battery storage facilities are appropriately located, designed and separated to avoid harm or mitigate the risk of harm to people, surrounding land uses and environmental values by:</i> <i>avoiding or where unable to avoid, minimise the risks of fire, explosion, thermal emission and containment release on and from the premises;</i> <i>avoiding or where unable to avoid, mitigate the risks to the use of bushfire (including airborne debris), flood and vehicular impact; and</i> <i>facilitating effective and efficient fire and emergency service response in the event of a fire, bushfire, explosion, contamination leak or other incident triggering an emergency service response.</i></p> <p><i>Note – Development applications should be supported by assessment material such as a risk management plan, fire and bushfire management plan and emergency plan. These plans must be prepared by a suitably qualified and experienced person.</i> <i>Note—Compliance with this Performance Outcome may be demonstrated by addressing CFA Design Guidelines and Model Requirements for Renewable Energy Facilities.”</i></p> <p>Furthermore, all development applications would need to demonstrate how runoff will be captured, stored, and treated to prevent contamination of soil and groundwater.</p>
<p>Health impacts</p> <p>Concerns have been raised about the potential health risks associated with toxic gas emissions from industrial developments.</p> <p>Concerns industrial pollution contributes significantly to poor air quality, which can exacerbate existing health conditions and pose long-term risks to nearby communities.</p>	<p>The regulation of industrial emissions is governed by the <i>Environmental Protection Act</i> and <i>Environment Protection Regulation</i>. These instruments establish air quality objectives that developments must comply with. All developments must comply with the legislative requirements. The TLPI does also outline separation distances from the development to help manage the risks associated with emissions.</p>
<p>Prohibit Renewable Energy</p> <p>Multiple submissions have requested Council to prohibit renewable energy and Battery Storage Energy Systems</p>	<p>Under the <i>Planning Act 2016</i>, Council cannot prohibit development. Council can outline development as impact assessable development (subject to public consultation and legal rights) and identify whether a particular development is supported or not supported under the planning scheme.</p> <p>Council’s role is to ensure that such developments are appropriately assessed and regulated through the local planning scheme, with a</p>

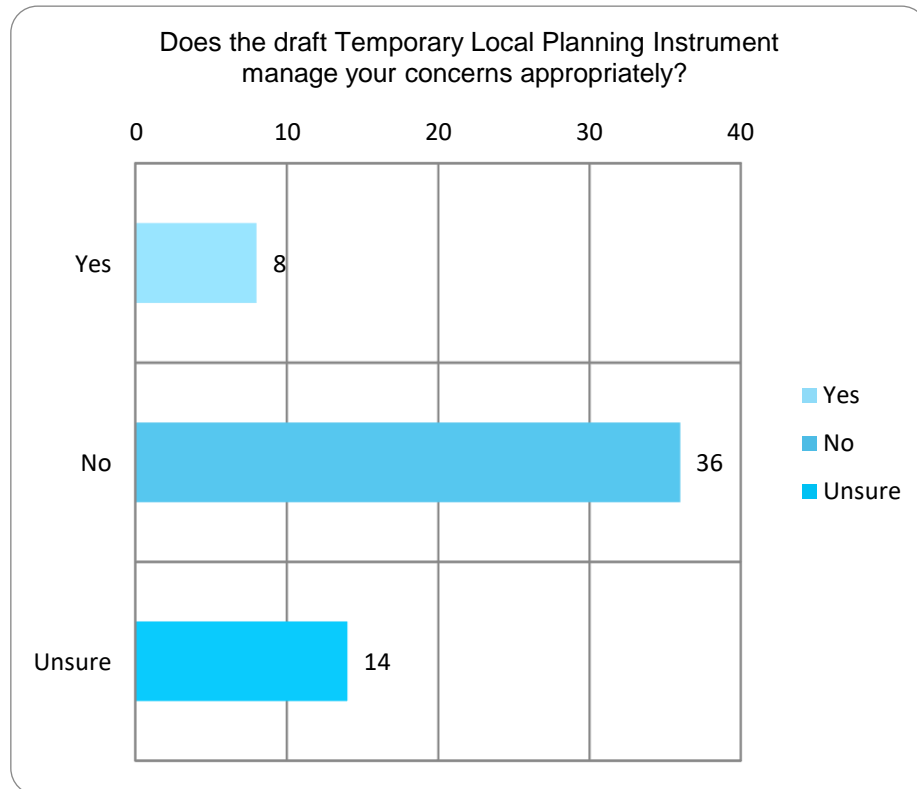
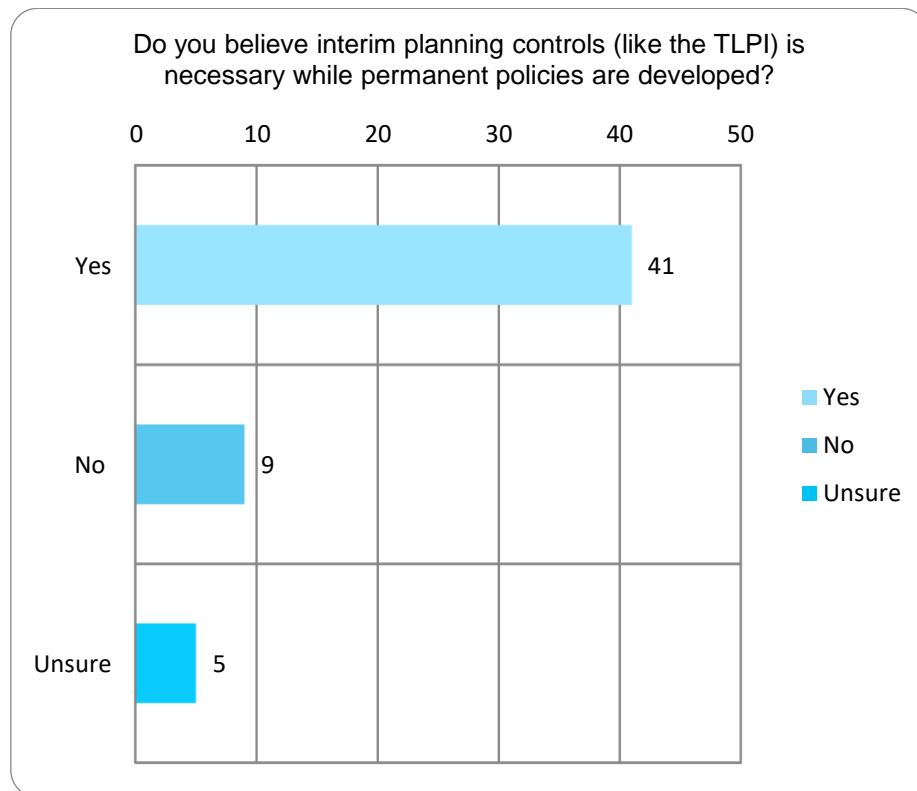
	strong focus on safety, environmental impact, and community wellbeing. Council is committed to protecting agricultural land, addressing environmental concerns, and ensuring meaningful community engagement to manage specific risks and impacts associated with these developments.
Property values and insurance Concerns these types of developments would devalue properties and increase insurance premiums.	Property values and Insurance is not a matter Council can have regard to under the <i>Planning Act 2016</i> when assessing and deciding a development application.
Development in flood prone land Concerns that development is not adequately restricted in flood-prone areas.	The Temporary Local Planning Instrument includes provisions that prevent development on land identified as flood-prone to minimise risks to property, infrastructure, and public safety.
TLPI is unnecessary Comments suggest the TLPI is unnecessary and not needed.	The Temporary Local Planning Instrument has been introduced to manage emerging development pressures and ensure that appropriate controls are in place while longer-term planning instruments are reviewed or updated. The TLPI provides an interim framework to protect key environmental, agricultural, and community values, and to address potential risks associated with renewable energy and battery energy storage system facilities.
Microplastics and Polymer Breakdown Concerns degradation of solar panels and wind turbine components can release microplastics into soil and water, causing unknown long-term effects on grazing animals.	Wind and Solar Farms are assessed by the State Government under the <i>Planning Act 2016</i> and <i>Planning Regulation 2017</i> . In particular under State Code 23: Wind farm development and State Code 26: Solar farm development.
High Voltage Transmission Line Exposure Concerns that there are established exposure guidelines for workers near high-voltage infrastructure, but limited research on long-term effects for nearby residents and livestock. This	The proposed Temporary Local Planning Instrument focuses on Battery Energy Storage Systems, not high-voltage transmission infrastructure. While we acknowledge community concerns about electromagnetic field (EMF) exposure, transmission line routing and associated health impacts fall under separate regulatory frameworks.

uncertainty supports adopting a precautionary approach.	
Earthquake risk Council to consider proactive earthquake mitigation measures.	Earthquake risk in the Rockhampton region is generally considered low based on current geotechnical and hazard mapping. Council applies relevant building codes and engineering standards that incorporate seismic resilience where required. These standards are set at the national level through the National Construction Code (NCC) and are designed to ensure structural safety in the unlikely event of seismic activity.
Cyclone rating Concerns the TLPI does not reference safety requirements during a cyclone in particular the requirements for cyclone rating	A Battery Energy Storage System requires Building Approval, as it is typically classified as a Class 10a structure under the National Construction Code (NCC). Building Approval would confirm that the development complies with the NCC and the Queensland Development Code (QDC), ensuring it meets minimum standards for safety, amenity, and structural integrity. The NCC also addresses cyclone safety through Specification B1.2 – Design of Buildings in Cyclonic Areas, which outlines structural requirements for buildings located in designated cyclone-prone regions.
Rural roads Requirements for developers to upgrade, widen and line mark and maintain rural roads to make them safe for increased traffic during construction phase and to allow for ongoing safe access for operational vehicles and the local community.	Developers will be required to assess the impact of construction and operational traffic on local road infrastructure and implement necessary upgrades. This may include widening, line marking, surface improvements, and ongoing maintenance to ensure safe access for construction vehicles, operational traffic, and the local community. Road upgrade requirements will be determined through traffic impact assessments and in consultation with Council's engineering teams to ensure compliance with relevant standards and long-term road safety outcomes.
Roads and Traffic Management Concerns the cumulative impact of these projects on the Bruce Highway has not been considered by Council. Will our rural roads and the highway be able to handle all these renewable projects.	Council works in collaboration with the Department of Transport and Main Roads (TMR) to ensure that impacts on state-controlled roads, including the Bruce Highway, are appropriately considered and managed. Where required, developers may be obligated to contribute to road upgrades or implement traffic management measures to maintain safety and efficiency across the network.
Battery Energy Storage Systems should be located in Industrial Areas BESS developments should be sited within designated industrial zones and located within 1000 metres of existing power grid infrastructure to minimise land use conflicts, reduce environmental and visual	Industrial areas may offer advantages in terms of land use compatibility and access to grid connections, however industrial areas are often closer to sensitive land uses than the proposed development setbacks recommended in the Temporary Local Planning Instrument. The Temporary Local Planning Instrument includes provisions to ensure that BESS proposals are appropriately located, with consideration given to environmental impacts, proximity to sensitive land uses, visual amenity, and infrastructure efficiency. Proposals must demonstrate compliance with safety standards,

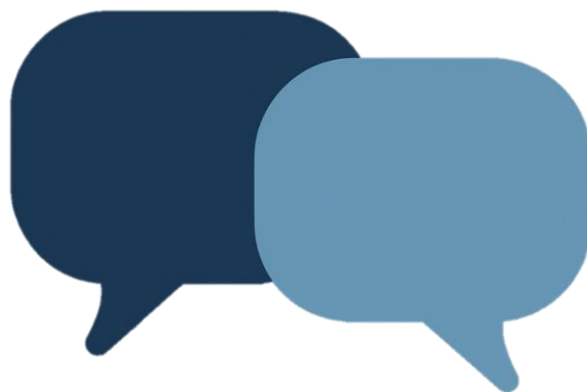
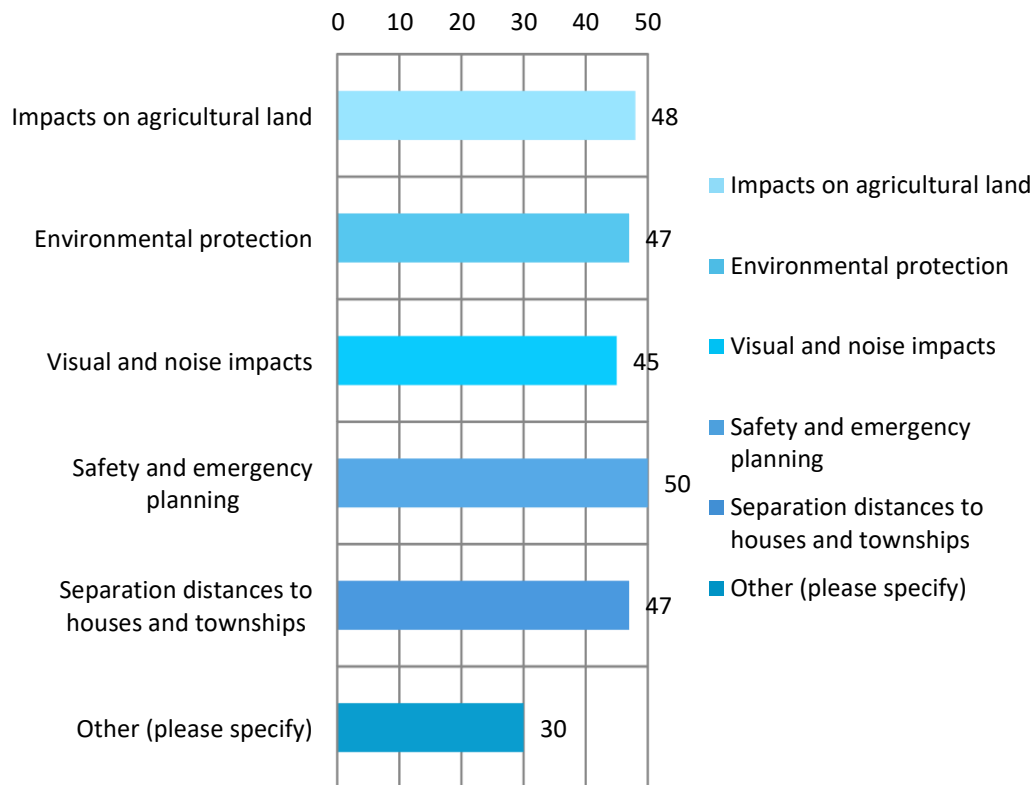
impacts, and ensure efficient grid connectivity.	land use planning principles, and technical feasibility, including access to grid infrastructure.
Supporting coal power There is concern that the current focus on net zero targets may overlook the value of existing coal-fired power infrastructure. It is suggested that greater consideration be given to maintaining and supporting coal power as part of the region's energy mix.	The proposed TLPI focuses on regulation of development for Renewable Energy (other than solar and wind farms) and Battery Storage Facilities. The TLPI does not relate to coal power infrastructure. The policies related to net zero and the future energy mix such as coal power generation is a matter of Commonwealth and State Government policy.
Restricting development Concerns the Temporary Local Planning Instrument may be restricting the timely development of renewable energy projects that are needed to support the community's transition to cleaner energy sources. It is suggested that the TLPI be reviewed to ensure it does not create unnecessary barriers to investment in renewable infrastructure.	The TLPI has been introduced to provide interim planning controls that guide the location and design of renewable energy and battery storage infrastructure, ensuring that development occurs in a way that protects agricultural land, rural amenity, and community safety. The TLPI does not prohibit renewable energy development but seeks to ensure that proposals are appropriately located and assessed against clear criteria.
Concerns regarding prescriptive acceptable outcomes Code requirements are too prescriptive which could risk setting unrealistic expectations within the community. Fixed figures for setbacks or buffers may be interpreted as non-negotiable standards, when in practice the planning framework allows Council to consider projects that achieve the intent of the Performance Outcomes through alternative measures.	Queensland's planning framework is performance-based, meaning that while acceptable outcomes provide guidance and clarity, they are not mandatory requirements. Instead, they represent one way of achieving the intent of the Performance Outcomes. Applicants may propose alternative solutions that demonstrate compliance with the overall planning intent, allowing flexibility in how outcomes are achieved. This approach ensures that planning decisions remain adaptable to site-specific circumstances while maintaining transparency and consistency in assessment.

<p>Does not feel like an authentic consultation</p> <p>Concern is expressed that the consultation process does not feel genuine or inclusive, with limited opportunities for meaningful community input.</p>	<p>Council values meaningful engagement and is committed to making consultation processes clearer, more inclusive, and more responsive to community feedback.</p> <p>Under the <i>Planning Act 2016</i>, Council was not required to undertake consultation for a Temporary Local Planning Instrument, however, in the interest of transparency and inclusiveness, Council chose to engage with the community throughout this process. Importantly, Council has made changes to the draft TLPI based on the feedback received during the consultation period, demonstrating a commitment to incorporating community input into the planning process.</p>
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Survey Response Graphs



What concerns, if any, do you have about Renewable Energy and Battery Storage developments?



Recommendations

Based on feedback received from the Community and State Government, the following changes to the TLPI are recommended:

- Amendments to the Strategic Framework to provide greater clarity regarding the location of facilities (not specifically limited to rural areas).
- Removal of the requirement for development to be located within 2,000 metres of an existing or approved electricity network or substation.
- Reducing setbacks to 1,500 metres from the Township zone, Rural Residential zone, Residential zone, Emerging Communities zone, and other surrounding sensitive land uses.
- Inclusion of provisions to ensure battery storage facilities are located toward the centre of the site.
- Requirement for a visual impact assessment for sites visible from public roads, public viewing locations, and sensitive land uses. The assessment must also consider the cumulative impact of adjoining and nearby developments.
- Requirement for noise assessments to be undertaken by a suitably qualified acoustic consultant.
- Requirement for development applications to be supported by a risk management plan, fire and bushfire management plan, and emergency plan. These plans must be prepared by a suitably qualified and experienced person, in consultation with the Queensland Fire Department.
- Requirement for facilities to comply with Australian Standards *AS3745 Planning for emergencies in facilities*, including battery explosion risk management.
- Inclusion of an acceptable outcome to ensure the development has a maximum operational lifespan of 20 years. After this period, the use must be decommissioned unless otherwise approved by Council.

It is also noted that the State Government is currently investigating Battery Energy Storage Systems as part of a review into the Queensland Planning Framework. This includes consideration of a statewide code and expanding the Community Benefit Agreement to encompass Battery Energy Storage Systems.