
Thank you for the opportunity to comment on the draft Solar Energy Facilities - Design and Development Guidelines (draft Guidelines)

PIA is the national voice for planning and the planning profession with more than 5,200 members nationally, over 1100 of whom are in Victoria. This submission has been prepared by the Victorian Division of PIA.

We understand that the draft Guidelines have been prepared to help outline the assessment and development process for large-scale solar energy facilities in Victoria, with "the aim of providing clear and technically robust advice on establishing well located, best practice facilities".¹

We believe it is very important to provide clear and technically robust guidance on how to plan for solar energy facilities in Victoria and we applaud the initiative taken to date in respect of the development of the draft Guidelines.

We do, however, consider that further work is required, if the draft Guidelines are to achieve their aim.

The draft Guidelines are divided into two main sections:

1. The first section is in respect of policy, planning and legislative requirements.
2. The second section is in respect of best practice guidance for proponents.

This submission will address each section, in turn.

Policy, planning and legislative requirements

The planning and policy section of the draft Guidelines asserts that well-sited and carefully designed solar energy facilities have minimal impacts on surrounding communities, the environment and on agricultural activities.

The draft Guidelines also contain statements to the effect that solar energy facilities can effectively co-exist with agricultural production.

However, the tension between the protection strategically valuable agricultural land and the proposed use and development of such land for a solar energy facility is not addressed by the draft Guidelines in any practical or meaningful way.

The Panel Report into the *Greater Shepparton Solar Energy Facility Planning Permit Applications*\(^2\) recommended that further strategic guidance should be provided in respect of:

(a) assessing future permit applications proposing a solar energy facility on land in an irrigated agricultural area;
(b) the potential for fragmentation of water-use patterns to the extent that would result in an unacceptable effect on an irrigation district;
(c) potential for cumulative impacts of solar energy facilities on agricultural production and on irrigation districts; and
(d) where solar energy facilities should be located in Victoria.

The draft Guidelines do not provide appropriate strategic guidance in respect of these matters.

The draft Guidelines contemplate a future statutory referral process involving relevant rural water corporations as well as future amendments to State planning policy and planning provisions to more clearly guide proponents.

On the available information, it is not clear to what extent such future processes may assist to provide the strategic guidance that is required to appropriately plan for where solar energy facilities should be located in Victoria.

In their current form the draft Guidelines do not provide relevant and helpful guidance for siting, design and development of solar energy facilities in Victoria.

It is requested that the draft Guidelines should be amended so as to set out clear criteria to be applied in the assessment of planning permit applications, so that the appropriate balance can be struck between protecting strategically valuable agricultural land and facilitating the development of solar energy facilities in Victoria.

**Best practice guidance**

The draft Guidelines address at a high level a number of the relevant siting, design and operational matters.

However, it is considered the draft Guidelines should be more detailed and standards based, so as to provide more practical guidance in respect of what constitutes best practice.

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\(^2\) Dated 23 July 2018.
The draft Guidelines should be amended to include:

(a) Recommended set back distances from property boundaries and landscape features such as waterways;
(b) Recommended vegetation screening and measures to minimise visual impacts;
(c) More detailed requirements for construction and operational management plans;
(d) Recommended permit conditions for permit expiry, end of use and decommissioning of facilities.

In their current form the draft Guidelines do not clearly detail what constitutes best practice for the design, use and development of solar energy facilities and it is requested that more detailed guidance be included in the draft Guidelines in respect of this.

If you wish to discuss any aspect of this submission, please do not hesitate to contact the

Yours sincerely