1 March 2019

Department of Environment, Land, Water and Planning
8 Nicholson Street
MELBOURNE VIC 3000

To Whom It May Concern:

Thank you for providing CFA with the opportunity to comment on the Department of Environment, Land, Water and Planning’s (DELWP) DRAFT Solar Energy Facilities Design and Development Guideline (the Guidelines).

A comprehensive response to the location, siting, design and development of renewable energy facilities is needed to ensure their development across Victoria are consistent, safe and respond to their surrounding environment. The Guidelines will provide clear guidance for solar energy facilities. CFA strongly supports the creation of such a document and encourages any guidelines developed by DELWP to be consistent with the CFA’s Guidelines for Renewable Energy Installations.

The shift towards renewable energy has seen Responsible Authorities seeking additional guidance on other up and coming use and development proposals, such as geothermal plants and landfill gas/biogas technologies. CFA strongly encourages the Department to consider either expanding these guidelines to reference other use and development applications that may require similar considerations or develop separate guidelines for these emerging technologies.

CFA provides the following comments and recommendations on the guidelines:

**Introduction – What are Solar Energy Facilities (p. 5)**

This section could be enhanced via more information to help users determine what a ‘large’ solar energy facility is and what factors might be considered in making this decision, i.e. size and location of size, number of panels or type of technology to be used, amount of energy produced.

The Guidelines reference battery storage, however it is unclear whether the proposed guidelines apply to battery storage within a solar energy facility of and/or separate applications for the use and development applications.
Policy Planning and Legislative Requirements - State Policy Direction (p. 7 and 8)

Renewable energy, water, regional development and agriculture and biodiversity are all important considerations. CFA recommends that additional policy directions regarding the reduction of risk from natural hazards is also included in this section, i.e. Safer Together, and EMV’s Bushfire Safety Policy Framework.

CFA recommends that part of the policy make mention of and have regard to the importance of natural hazards, particularly given the prioritised position bushfire is given under Clauses 13.02 and 71.02-3 of the Victorian Planning Provisions. A key state policy direction is to provide priority to bushfire and enhance community safety – the broader perspective for solar energy facilities is important in this regard. CFA recommends that this area be expanded upon to include reference to safer communities and planning for natural hazards such as bushfire and flood.

Policy Planning and Legislative Requirements - Strategic Site Selection (p. 9)

Choosing an appropriate site is an important consideration for a solar energy facility. This section should also encourage early discussion with relevant agencies i.e. CFA, EPA, Water Authority, in addition to the Responsible Authority.

Ensuring that siting and location consider the risk from natural hazards to the facility and how any risks will be reduced to an acceptable level and what effect will the site on emergency management planning, i.e. bushfire or flood. CFA recommends a separate section be added that discusses natural hazards.

CFA recommends that the ‘Strategic considerations’ checklist (p. 9) include reference to:

- Level of risk from natural hazards and whether the risk can be reduced to an acceptable level; and

Policy Planning and Legislative Requirements - Detailed Development Assessment (p. 16)

CFA recommends that a bushfire assessment report be included as part of the application requirements for any application located within a Bushfire Prone Area or Bushfire Management Overlay. The site analysis and design response should identify and respond to the information prepared in response to the Bushfire Report.

Section 5.3.6 specifically identifies that CFA may be referred an application for comment. CFA recommends that this section include a reference to CFA’s Renewable Energy Installations Guidelines, published February 2019.

CFA recommends that a sub-criterion be added under section 5.3 around natural hazards – the impact of the solar energy facility on the environment and the risk or effect of natural hazards on the site. Whether an alternative site is available that will avoid the risk, or what mitigation measures will be adopted.

CFA recommends that a sub-criterion be added under section 5.3 around emergency management, that specifically references risk management (identify, analyse and control risks, supported by monitoring and review processes.)
**Additional Recommendations**

- The ‘landscape values and visual amenity’ section on page 26 as it pertains to vegetation retention or additions may need to be considered with reference to vegetation requirements within a Bushfire Management Overlay, if applicable.

- The reference to developing effective fire prevention measures under Section 9.1 on page 31 could include ‘provision of firefighting water’ as a (key) example.

- The ‘operations management plan’ under Section 9.1 on page 31 could include the ‘procedures for the storage and handling of any dangerous goods, including batteries’;

- Replace ‘bushfire season’ with Fire Danger Period under Section 9.1 on page 31.

- Include the management/containment of fire water runoff in Section 9.3 on page 31.

- Appendix A on page 34: The key contact at CFA would be Fire Safety Referrals (firesafetyreferrals@cfa.vic.gov.au).

If you wish to discuss this matter in more detail, please do not hesitate to contact CFA fire safety referrals on 9262 8578 or Land Use Planning Coordinator on .

Yours sincerely,

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Community Safety - Fire and Emergency Management