Submission for the draft solar energy facilities design and development guidelines

Submitted by [Name]

I am strongly supportive of the Victorian Governments move to produce guidelines for the development of solar energy power plants in Victoria. The draft guidelines however fall short though in a number of key areas and require much more detailed responses to a range of issues that were recently uncovered in the planning panel hearings held in May 2018 in Shepparton. This planning panel was held to examine the suitability of four such power plants in the Shepparton region, three of which were sited on prime GMID connected high value irrigated farmland. These three form a good basis for understanding the unique impacts of such power plants on local intensive farming community. The consequential community unrest caused by these proposals should cause the framers of any guidelines to carefully consider the special case of siting these installations near intensive irrigated communities.

There are a number of issues that have not been considered or seem to have been dismissed without adequate explanation in the draft. Many of these were addressed at the planning panel and I encourage those people tasked with framing the guidelines to look again at the issues raised. Here are some of the key ones.

1. **HEAT ISLAND EFFECT.**
   The particular impact of demonstrated heating effects on sensitive horticultural crops. This issue needs to be extensively evaluated as suggested by many at the planning hearing. There are a very limited number of studies looking at this issue and they all indicate elevated temperatures in areas near the power plants. The draft guidelines seem to dismiss this on very limited evidence or assumptions that need much more evaluation. I refer to my submission made at the Shepparton planning panel which details at length with supporting letters from senior local and government agronomists that this issue is significant and needs further work.

2. **COHABITATION WITH FARMING OPERATIONS**
   There is some suggestion that these power plants can co-utilize land with other industry apart from the elevated temperatures that stock or crops would have to deal with, there is very little real commercial or realistic examples that would add weight to this suggestion. It looks great from a PR perspective but is typical of PR communication.

3. **GMID IMPACTS**
   An explicit acknowledgment of the unique characteristics of the GMID region and its importance for irrigated agriculture needs to be included which has the effect of protecting and fortifying the value of irrigation in our region. No power plants should degrade or materially impact irrigated agriculture and the GMW irrigation infrastructure.

4. **AMMENITY IMPACTS**
   The GMID is an intensively farmed region and by its nature has a higher density of rural dwellings in farming regions. This issue seems to have been almost entirely overlooked in terms of any specific detail. The question needs to be asked what would a resident in suburban Melbourne consider a reasonable setback from such a large scale industrial complex? Much more detail needs to be considered on this issue.
If this set of draft guidelines is in any way a model for a future framework I suggest:

1. As a matter of urgency that a strategy group which includes representative rural landholders be convened to consider these guidelines and appropriate sites in Victoria.

2. There seems to be an absence of any proposed changes to the planning provisions in key areas such as Local Government suitability to assess such schemes, application of world’s best practice and a consideration as to who might be best suited as the responsible entity to consider such proposals. (As is the case for wind farms where the planning minister has responsibility)

3. A much more detailed and thorough approach be taken to the guidelines. The present document seems very light on detail particularly with respect to appropriate planning and policy considerations.

4. As such a halt to any rural projects be considered so that appropriate guidelines can be fully developed.

Kind Regards