File: 13/01/01
28 February 2019

The Hon. Richard Wynne MP
Minister for Planning
Government of Victoria
Level 16, 8 Nicholson Street
EAST MELBOURNE VIC 3002

Dear Minister Wynne,

SUBMISSION ON SOLAR ENERGY FACILITIES – DESIGN AND DEVELOPMENT DRAFT GUIDELINES

Thank you for providing these Draft Guidelines and the opportunity for comment.

Both Mildura Rural City Council and the community are enthusiastically supportive of the significant transition to renewable energy that is underway in our municipality. We have installed substantial solar energy capacity across our municipal buildings and facilities to reduce our energy costs and greenhouse gas emissions.

Over the last fourteen years Council has had to consider numerous solar farm development proposals. Council’s experience illustrates how complicated and finely balanced assessment of each individual proposal must necessarily be. Setting aside other financial and logistical matters, planning must take into account a range of significant, at times conflicting, strategic objectives and statutory provisions, in addition to community concerns regarding possible off-site impacts.

Most particularly, as recognised in the Draft Guidelines, we refer to the need to preserve high value agricultural and horticultural land already served by water infrastructure. The need to preserve this land for such purpose is ever more apparent given the contentious state of the Murray – Darling water resource management upstream.

We therefore thank the Minister, through previous DELWP advice, for the strategic planning advice and support we have received to this end.
However, this does not preclude well-reasoned and sound decisions by Council to still be taken to VCAT, thus highlighting the need for clearer and more prescriptive guidelines than the Draft Guidelines currently provided.

As a case in point, Council will be watching closely as to how VCAT ultimately determines an appeal regarding the PowerVault solar farm development proposal, scheduled to be heard in late April / early May 2019.

In summary, our feedback in response to the Draft Guidelines is as follows:

- There is a need for more prescriptive guidance for the consideration of large scale solar developments, either as a Proponent or Responsible Authority, particularly on agricultural and horticultural land.

- There is a need to better address / guide perceived conflicts between preserving agricultural / horticultural use of high quality farm land already serviced by water infrastructure (e.g. Mildura Older Irrigated Area land as per attached MOIA map), and accommodating solar farm developments, or alternatively, being able to offer other land for the latter, but which still provides good (new) access points to the electricity grid.

- The guidelines should identify LGA specific land restrictions such as MOIA.

- There is a need for more specific guidance around ‘appropriate locations’ for large scale solar developments. The term ‘agricultural quality’ also needs to be more clearly defined.

- Current transmission lines are already at capacity and this is having a detrimental impact on locational opportunities for renewable energy developments in our municipality. *To this end, we believe it is necessary and would be supportive of any State Government investment in an upgraded / new link to the Grid from Victoria, as this would open up new locational options for new solar farm proposals; and*

- There is significant economic benefit to be achieved from facilitating expanded solar (and other renewable energy) developments, adding a welcome additional “bow” to Mildura’s robust and diverse economy,
currently enjoying strong production and commodity prices, and low unemployment.

In closing, we would also add that we are mindful that residents of other regional areas feel they have already contributed "enough" towards boosting supply of renewable energy in Victoria. With regard to locational advantage and wind power, we are aware local residents around Mortlake in south-western Victoria, feel the further densification of wind turbines distribution is too great a further sacrifice of attractive landscape vistas.

In response, we here in Mildura believe, with appropriate strategic planning across the renewable energy sector and better National Grid infrastructure planning, there are potential win-win outcomes for all Victorians to be gained by looking at the renewable energy potential of the State as a whole.

We believe this would be a better way of capitalising on the vast expanse of land and sunshine available in the north-western corner of Victoria, such that other areas around the southwest of the State may preserve the landscape vistas, while still achieving the overall goal of the continued transition to renewable energy.

Should you have any queries regarding the above comments please contact Bernadette George, Strategic Planner, on (03) 5018 8427.

Yours faithfully,

[Handwritten signature]

Enc: MOIA Map
Copy to: DELWP Planning Systems e:

CP/bg