



28 September 2015

The Hon Lily D'Ambrosio MLA
Minister for Energy and Resources
Department of Economic Development, Jobs, Transport
and Resources
1 Spring Street
Melbourne Vic 3000

Ask for: Natalie Walker
Phone: 9932 1096
Our Ref: A2214431

Dear Minister,

Submission to Victoria's Renewable Energy Roadmap

Hobsons Bay City Council welcomes the opportunity to provide input to Victoria's Renewable Energy Roadmap. Council supports the Victorian Government's objective of accelerating development of renewable energy generation in Victoria to reduce emissions, create jobs, and put downward pressure on energy prices.

Thank you for the opportunity to comment. If you would like to discuss this submission further, please contact Natalie Walker, Director Strategic Development on 9932 1096 or email nwalker@hobsonsbay.vic.gov.au.

Yours sincerely,

A handwritten signature in black ink that reads "Chris Eddy". The signature is written in a cursive style and is enclosed within a large, thin, hand-drawn oval.

Chris Eddy
Chief Executive Officer



Submission to Victoria's Renewable Energy Roadmap

The Victorian Government's objective of accelerating development of renewable energy generation in Victoria to reduce emissions, create jobs, and put downward pressure on energy prices is strongly supported. The Renewable Energy Roadmap (the Roadmap) provides an excellent foundation if it is supported by adequate funding for the identified initiatives and an ongoing commitment to a strong and consistent policy setting.

Council's Community Health and Wellbeing Plan 2013–17, Community Greenhouse Strategy 2013-30 and Economic Development Strategy 2015-20 align closely with the objectives of the Roadmap.

Council has an important role in enabling, engaging and encouraging the local community to move to a low carbon future. The Community Greenhouse Strategy has been developed by Council to support the reduction of greenhouse gas emissions within the municipality. The strategy sets an ambitious target of zero net emissions by 2030 and identifies eleven emission reduction activities that could support further development of renewable energy.

Council is committed to becoming a leader in sustainable business practice, and to providing the support and assistance required to create a culture of sustainability best practice across the municipality. The Economic Development Strategy, acknowledges the important role of sustainability in creating an adaptable and socially aware business community that is resilient to global economic shifts.

In addition to expressing general support for the objectives of the Roadmap, specific comments are presented below.

1.3 Re-establishing Victoria as a leader in renewable energy - Driving jobs and investment

The commitment to grow jobs through the *Back to Work Jobs Plan* is strongly supported as this aligns with Council's commitment, through its Economic Development Strategy to create a local environment that supports and enables green business practices and to promote Hobsons Bay as a leading destination for sustainable business.

The Victorian Government is urged to expand the *New Energy Jobs Fund* to ensure ongoing support for this growing sector. Development of distributed renewable energy sources will not only assist with energy demand and security concerns, but help to create local jobs for local people with wide spread environmental and economic benefits.

3.3 Using Government energy purchasing to support renewables

The Roadmap notes the Victorian Government is a large user of energy. Many councils are also large energy users, operating across a range of sites and operations. There may be an opportunity for the Victorian Government to collaborate with councils to enhance the opportunity to promote investment and jobs growth in the renewables sector through innovative purchasing arrangements or through leveraging increased purchasing power.



4.2 Removing barriers to innovative projects and business models

Initiative 1 is to 'Address barriers to precinct-scale distributed generation'. An investigation of the barriers that affect precinct-scale distributed generation is supported as this would be of significant value to progress future generation projects.

Additionally, in considering appropriate mechanisms to support financing models for communities, it is recommended that the Victorian Government should facilitate the development of a finance options guide. This guide would provide proponents and stakeholders with a comprehensive overview of all available funding sources, models and mechanisms to ensure an appropriate option can be chosen, and assistance sought, to facilitate implementation.

5.1 Provide support for pioneering community energy projects

As per the comments regarding item 4.2 above, it is recommended that the Victorian Government should facilitate the development of a finance options guide as this would also support the development of community renewable energy projects.

5.3 Ensure fair treatment of distributed generation customers

The initiatives under section 5.3 are supported as undertaking action to ensure solar customers are not discriminated against by energy retailers is a necessary and valuable initiative. It is also recommended that once any changes are made, the resulting arrangements are clearly communicated to the wider community. Anecdotal evidence suggests that there may be many members of the public that are not being treated fairly but cannot take action due to a lack of transparency from energy retailers, inclusion of eligibility criteria for supply offers and a lack of understanding of their own rights. As such, the Victorian Government's objective to raise awareness to create a fairer, more transparent market is imperative.

Protection of solar access for solar panels

There is unclear policy within the Victorian planning framework regarding protection of solar access for solar panels. Clear regulations on the protection of solar panels are required to ensure that ongoing investment into solar panels is protected and encouraged.

Clause 54.03-5 and 55.03-5 of the Victorian Planning Provisions include a standard that buildings should be "sited and designed to ensure that the energy efficiency of existing dwellings on adjoining lots is not unreasonably reduced." It is not clear from this standard whether this extends to protecting existing solar panels on adjoining dwellings. The Victorian Civil and Administrative Tribunal (VCAT) have had differing interpretations as to whether solar panels should be protected. In 2012, VCAT's decision in *Chen versus Melbourne City Council (Red Dot)* VCAT 1909 determined that the extent of loss was unreasonable and contrary to the objectives of the planning scheme. The decision raised concerns that no state-wide provisions existed to guide decision makers in determining what constitutes an unreasonable impact on solar panels. In 2014 in *Buckerfield Architects versus Stonnington City Council*, VCAT 2099, the tribunal approved a six storey apartment complex which adjoined a recently constructed four storey building with an array of PV solar panels mounted on its roof. At the hearing expert evidence presented on behalf of the PV panel owners concluded



that the proposed shadowing would reduce the solar collection system's capacity by approximately 50 per cent per annum.

Residents and businesses who install solar panels on their properties have committed to a long term financial investment which, under the current planning framework does not provide clear direction as to whether they will be protected. This may result in a deterrent and a reduction in the number of solar panels installed on buildings within Victoria, contributing to greenhouse gas emissions. Clear regulations on the protection of solar panels are required to ensure that ongoing investment into solar panels is protected and encouraged.