

Dear State Planning Commission members,

At Eudunda on December 4, I was advised that the proposed setback distances from wind turbines in the new draft Code were largely governed by recommendations from the EPA. These recommendations related to noise guidelines and the committee was “sort of duty-bound” to follow them.

This didn't make sense to me because earlier in the evening I had been told that the proposed setback distances related to visual amenity. I couldn't see the correlation. These are two completely different assessment criteria.

I followed up by emailing DPTI and was advised that the proposed setback distances relate to visual amenity and public safety (nothing to do with the noise guidelines, apparently).

However, when I then asked for the justification supporting the setback distances chosen, DPTI was unable to provide any evidence or rationale, other than to say that the distances build on existing wind farm policy introduced in 2012 which was “widely consulted” at the time and to which I was helpfully sent a link.

I followed this link and read the associated documents. This is what the The Development Policy Advisory Committee (DPAC) 2012 report stated in regards to visual amenity:

*A policy which embodies a “precautionary approach” is favoured by DPAC. “For this reason, it is considered that, subject to qualification regarding accumulation and height of wind turbines and topography (discussed below), two (2) kilometres could be nominated as the distance by which a wind turbine should be setback from a dwelling to manage visual impacts.” (p.11).*

Did DPTI send me this link in order to mock me? Did they want to show me that they have a proven record of ignoring even their own advisory committees?

Furthermore, as this minimum 2km setback was recommended at a time when wind turbines were an average of 120 metres high, and, with turbine heights now frequently being double this height, logic would suggest that the minimum setback distance should now be 4kms, instead of the 1.2 km minimum setback currently proposed by DPTI.

Ever the optimist, I thought, ‘Well, the proposed setback distances won't protect the visual amenity but surely there are other, more detailed performance based criteria that a wind farm must meet?’

Sure enough, there are numerous visual amenity conditions for renewable energy projects including obscuring the view of infrastructure, siting below ridgelines and avoiding impacting visually sensitive landscapes. I could breathe a small sigh of relief. As a type of renewable energy, at least wind farms would need to meet these planning laws.

Until I read that wind farms have been exempted from meeting the visual amenity guidelines for renewable energy project. Wait. Stop. How could this be?

No. It's true. The single biggest form of renewable energy that will impact visual amenity is exempted from meeting the visual amenity conditions. How did this suggestion get even get to the consultation stage? Is someone in DPTI playing an in-house joke that has gone too far?

Reading on in the Code, the only visual amenity conditions wind farms need to meet, other than the deeply inadequate setbacks previously mentioned, are to make the turbines uniform, have the blades rotate together and to have tubular rather than lattice towers.

Regardless of DPTI's political agenda, this is so extraordinarily unjust I don't even know where to begin.

Wind farms should adhere the same visual amenity requirements as all other renewable energy projects and DPTI should look at adopting the setback distances first proposed to them in 2012 by their own advisory committee.

Regards, Rebecca.