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28 March 2019

RE: PLANNING AND DESIGN CODE

Dear Jason

Thank you for the opportunity to provide comment on the draft "Planning and Design Code in the Outback" (the Code).

I write with specific reference to the General Section - Renewable Energy Facilities (Wind Farms):

1. Removal of Noise Considerations

It is noted, with disappointment, that any reference to noise impact has been removed from the performance outcomes.

The 2013 EPA State of the Environment report specifically identified that "*in recent years wind farm installations have been associated with an increase in noise complaints*" and noted that "*noise above safe levels leads to a number of known health impacts such as stress, high blood pressure, loss of sleep, inability to concentrate and loss of productivity*".

It is also noted that in October 2018 the World Health Organisation explicitly identified wind turbine noise as a source of health impact.

With complaints from neighbours increasing and the size and output of wind turbines also increasing, there is clearly a need to strengthen, rather than dilute, protections for nearby residents.

In this regard, the removal of such provisions are extremely alarming, with the following amendment to the Code recommended:

PO 8.7

Wind farms and ancillary development should be sited at a distance that avoids excessive noise (including amplitude modulation, low frequency and infrasound) impact on nearby property owners / occupiers.

2. No Increase in Buffer Distances to Non-Associated Residences

It is, again, disappointing to note that there has been no increase in buffer distances between turbines and non-associated residences in the Code, despite the current Liberal Government having a clear policy of banning turbines within two kilometres from an existing dwelling without the landholders consent, and five kilometres from a town or settlement.

In this regard, the following amendment to the Code is recommended:

DTS 8.1

Wind turbine generators are:

(a) setback at least 2,000m from non-associated (non-stakeholder) dwellings and tourist accommodation;

(b) setback at least 5,000m from a zone primarily intended to accommodate sensitive land uses.

3. Removal of Environmental Considerations

It is noted that the performance outcomes also substantially dilute environmental considerations, with the explicit removal of provisions to minimise or avoid modification of vegetation, soils and habitats.

The 2018 South Australian Government Environmental Trend and Condition Report card identifies that the statewide trend in abundance and distribution of native vegetation is getting worse, due to a range of pressures, predominately land clearance, degradation and fragmentation.

Wind turbines and associated road networks are often constructed in areas of remnant vegetation, and often containing threatened species or communities.

In this regard the following amendments are recommended:

PO 8.8

Wind farms and ancillary development should be located to avoid modification of vegetation and habitats.

4. Removal of Interference with Television and Radio Signal Considerations

All references to minimising interference with television and radio signals and geographic positioning systems has been removed from the performance outcomes.

It is recommended that the following amendment be made:

PO 8.9

Wind farms and ancillary development should be located to minimise interference with television and radio signals and geographic positioning systems

Conclusion

There is no doubt renewable energy is our future, but it must be underpinned by good planning and strong compliance to protect neighbouring residents and landuses.

It is disappointing the Code substantially dilutes, rather than strengthens this fundamental premise.

Yours sincerely



Anita Crisp

[Redacted contact information]

LEADER OF THE OPPOSITION



LEGISLATIVE COUNCIL

PARLIAMENT HOUSE

ADELAIDE, S.A. 5000

TELEPHONE: 8237 9100

Monday, 16 July 2012

Dear

Thank you very much for your letter regarding wind farm development in South Australia. I'm very glad you raised the points you did. As you may know, State Parliament's Upper House has agreed to my motion to form a select committee to investigate wind farms in South Australia.

South Australian Liberals want to protect residents and communities from wind farms built too close to homes and villages. This includes protection against economic losses caused by restrictions on aerial fire-fighting, spraying, crop-dusting and mustering. South Australians don't want to live too close to industrial scale wind generators. Neighbours and adjacent landowners' farm management practices and rights must not suffer because of a Labor-approved wind farm on another property.

We have more wind generation of any other State – in fact, we have one of the highest penetrations in the world. More than half of Australia's installed wind power is in SA.

Wind-powered generation was previously seen as totally environment-friendly and green, but turbulence is building over its cost, health effects and aesthetics.

Community opposition to industrial scale wind generators is increasing. At the same time, Labor is planning to approve more and more wind farms closer and closer to homes, villages and schools. Neighbouring homeowners and primary producers want to be protected from encroaching wind farms.

The ALP has removed third-party appeal rights. Liberals believe wind farms must not be approved on sites where they create negative economic and social effects.

We will protect residents by banning new wind turbines from being built closer than two kilometres from an existing dwelling without the homeowner's consent, and five kilometres from any town or settlement.

The Liberal Party stands for fairness. It's a principle the ALP has long forgotten.

Wind-generated power is very expensive, but wind farms don't reduce the need for conventional generating capacity because we still need to meet peak demand on hot or windless days.

The Energy Retailers Association warns we're footing the bill for both wind and back-up electricity generation. We still have to pay for all that infrastructure even if it isn't used. Then there is the cost to individual homeowners. Homes and properties are often devalued when nearby turbines are in line-of-sight. Experts assess the loss of value to be in excess of 30 per cent and sometimes up to half.

Like car sickness, turbines don't affect everyone but no one doubts the validity of the sufferer's condition. I am told that the Clements Gap and Waterloo wind farms can be heard three kilometres away. Some people report sleep disruption and nausea.

Turbines reduce the ability of aerial fire-fighting. Planes have to keep their distance from turbines. In November last year the Southern Fleurieu CFS was called to a fire at the Starfish Hill Wind Farm near Cape Jervis. CFS officers could do little but watch the blaze from a kilometre away when Work Safe deemed it too dangerous to approach.

Primary producers who use crop-dusting or aerial applications are often restricted from spraying crops, resulting in financial loss. The Aerial Agricultural Association of Australia says wind farms are a direct threat to aviation safety.

"They also pose an economic threat to the industry," says the AAAA. "As a result of the overwhelming safety and economic impact of wind farms and supporting infrastructure on the sector, the AAAA opposes all wind farm developments in areas of agricultural production or elevated bushfire risk."

Wind generation facilities are ferociously opposed by many communities. The first real test was in 2002 over a proposed 20-turbine generator around Myponga and Sellicks Hill. A seven year-long campaign against the proposal – some generator towers were less than 750 metres from homes – led to the proposal being scrapped.

Under Labor's rushed new planning laws huge pylons, with the tips of their blades spinning near half the speed of a jet liner, can be built 1000 metres of your home.

There are parts of South Australia, like the far west coast, which seems perfect for wind power. It is sparsely populated but lacks the infrastructure to get the electricity to consumers. I want the committee to investigate transmission issues too.

The Upper House committee will investigate separation distances between wind turbines and homes, the social, health and economic impacts of wind generators, and the need for a peer-reviewed, independent academic study into their effects.

When I urged Parliament to form an investigating committee, I said we hoped to hear from landowners, electricity distributors, wind power companies and scientists.

I now invite South Australians from the cities and the bush – including yourself - to prepare evidence. We'll examine that evidence fearlessly and impartially.

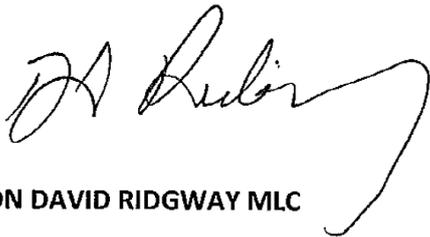
The Liberal Party is not against wind power. We support and encourage it as part of the State's energy mix. But we must know more. We're operating in a knowledge vacuum, and axiomatically wind power doesn't work in a vacuum.

I hope you will consider making either a written submission to the committee, and you are very welcome to make an oral presentation. You can write to the committee:

*The Secretary
Select Committee into Wind Power
Parliament House
North Terrace
Adelaide SA 5000*

Thank you very much for your letter. I enclose two photographs taken while I was at the Keyneton community meeting.

Best wishes



HON DAVID RIDGWAY MLC

Leader of the Opposition in the Legislative Council
Shadow Minister for Economic Development
Shadow Minister for Urban Development and Planning
Shadow Minister for Tourism