Mr Michael Lennon  
Chairperson  
State Planning Commission  
GPO Box 1815  
ADELAIDE SA  5001  
DPTI.PlanningReform@sa.gov.au

16 October 2019

RE: PROPOSED CHANGES TO RENEWABLE ENERGY POLICY

Dear Mr Lennon,

Thank you for the opportunity to provide feedback on the proposed changes to renewable energy policy in the planning and design code.

There is over $15 billion investment proposed or underway in the Upper Spencer Gulf, and potentially up to 9,000 jobs, across a range of renewable energy, mining and processing, defence, value-added agriculture, event and nature-based tourism.

Whilst this is positive for the region, the Port Pirie, Port Augusta and Whyalla Councils are seeking much closer government collaboration around workforce, infrastructure and development planning to ensure flow-on impacts and any unintended consequences are managed and positive benefits are maximised.

As highlighted in previous correspondence to you, our Councils and communities have a strong track record of encouraging and supporting renewable energy developments, however in recent times this has on occasions been tarnished by a lack of appropriate safeguards for neighbouring residents and limited Council engagement and jurisdiction.

In this regard Spencer Gulf Cities welcomes the review of renewable energy planning assessment, approval and compliance processes. We are very pleased to note the policy recognises the changing mix of renewable energy generation, and makes some provision – even if only notionally – for solar photovoltaic arrays, solar thermal plants, grid-scale batteries, biofuels facilities and pumped hydro systems.

We would encourage the Commission to continue to closely monitor expansion of these new technologies (for example pumped hydro, ‘green’ hydrogen) and to update the planning and compliance criteria as deployment occurs, to ensure any adverse impacts on the community, environment or adjoining landuses are recognised and mitigated as early as possible.
In the meantime, the ongoing installation of large-scale wind farms remains a highly contentious issue for our Councils and communities.

Whilst we note some amendments have been made to the planning policy in relation to this form of development, a number of key issues have not been addressed, despite being repeatedly raised by local government and impacted communities over several years. Key, unresolved issues include:

**Visual amenity on the Flinders Range**
It is disappointing that calls from Councils for stronger dialogue and establishment of a working group to ensure the character of the iconic Flinders Ranges landscape is protected from inappropriate development into the future has not been forthcoming.

**Cumulative Impact**
Whilst cumulative impact has been noted in the policy discussion, it is disappointing that there is no explicit guidance or assessment criteria for this to be formally considered. As more windfarms continue to be installed and proposed across the Upper Spencer Gulf and neighbouring Mid North, the cumulative impact on visual amenity, noise, telecommunications, the environment and other land uses like tourism, must be taken into account.

**Noise and Setback from Residences**
The proposed differential setback distances between residences located within or outside townships/settlements remains inconsistent and inequitable. Residents should expect the same level of protection, regardless of where they live. Furthermore, these distances remain inadequate considering recent academic research from Flinders University concluding that noise impact from wind turbines can extend to 8km and is common at 3.5km.

In this regard, it would appear logical that the policy be amended to require a minimum setback of 3.5km to any non-associated residence, regardless of whether they are within or outside a town boundary.

It is also disappointing that, despite acknowledging that wind turbines are now double the height and double the output of earlier developments - and despite the South Australia EPA themselves reporting an increase in windfarm noise complaints across the state, including for low frequency and infrasound – noise protection requirements are proposed to remain as per the current system.

The Commission should note that the statement within the Discussion Paper that ‘there is no evidence that exposure to wind farms directly affects a person’s physical or mental wellbeing’ is both false and misleading.

The study actually found consistent evidence that noise from wind turbines is associated with sleep disturbance, poorer sleep quality and quality of life. Furthermore, in 2018, updates to World Health Organisation guidelines specifically determined that wind turbine noise can have serious health impacts on residents. More recently, peer-reviewed academic research by Flinders University found windfarm noise and vibration impact can cause issues to residents several kilometres away.
Factually incorrect statements like this do little to restore confidence by communities that the government is genuine about improving safeguards and protections for residents living nearby these industrial developments.

Traffic Impact
Councils remain concerned about traffic management and asset damage on local roads and the impact of dust from construction and the often substantial internal road network of renewable energy developments, noting this concern extends beyond windfarms to other forms of renewable energy development.

It is the experience of Councils that dust mitigation conditions applied to renewable energy development approvals often do not adequately take into account local conditions.

A number of recent renewable energy developments in the region have also highlighted the unintended, but significant, consequence of workforce traffic flows on local roads and the impact on asset maintenance and lifespan that is then incurred by the local Council. Lack of clarity regarding project completion dates and associated ‘make good’ provisions has meant local roads continue to be negatively impacted without any recourse available for the local community.

Stronger and more genuine and considered engagement with local government as part of the assessment processes, particularly for Section 49 Crown Sponsored projects, is encouraged in order to understand and apply conditions suited to the local conditions.

Rating Inequity
Current State Government legislation prevents Councils from rating windfarms and other renewable energy facilities. As a result, there is a substantial inequity in allocating the rating burden, meaning the local community is cross-subsidising these major developments and their impact on local infrastructure and services.

It is considered grossly unfair that the existing resources available to regional communities should be stretched to accommodate increased pressures generated by significant, highly profitable commercial interests.

Spencer Gulf Cities strongly supports calls from Regional Local Government Associations across South Australia for legislative change to allow Councils to rate renewable energy facilities as they are able to apply to any other industrial development.
In summary, renewable energy is a significant and welcome part of the Upper Spencer Gulf’s future.

We reiterate that expansion of renewable energy facilities must be well-planned and orderly and must be underpinned by appropriate protections for nearby residents and land uses.

Whilst we applaud the intent of the renewable energy policy review, the provisions remain largely inadequate for the task ahead.

We once again encourage the Commission and Department to strongly and genuinely engage with regional Councils who have substantial first-hand experience managing both the positive and negative impacts of these developments, in order to strengthen the policy ahead of its implementation.

Yours sincerely

Mayor Leon Stephens
Chair – Spencer Gulf Cities

Attachments;
- Port Augusta City Council – concerns regarding DP Energy Windfarm Stirling North
- Port Pirie Regional Council – opposition to Neoen Windfarm Crystal Brook
- Flinders Ranges, Port Augusta, Mount Remarkable, Northern Areas, Port Pirie Councils – concern regarding windfarms and the Flinders Ranges Landscape Protection zone.
- Spencer Gulf Cities – previous correspondence to the State Planning Commission 2018
- Spencer Gulf Cities – media release regarding “Rating Equity for commercial and industrial land uses outside towns in South Australia” report, 2018
21 June 2019

The Secretary
State Commission Assessment Panel
GPO Box 1815
ADELAIDE SA 5001
Attn: Mr Simon Neldner

RE: DP ENERGY AUSTRALIA PL - PORT AUGUSTA RENEWABLE ENERGY PARK
(660/V008/15 V1)

Dear Mr Neldner

At its meeting held 11 June 2019, Council considered the variation to the development application by DP Energy Australia Pty Ltd for the Port Augusta Renewable Energy Park and resolved to prepare a submission under the public notification provisions to the State Commission Assessment Panel addressing matters including amenity, Council rates, proximity of wind turbines, roads, traffic and dust.

It is noted that DP Energy Australia Pty Ltd received development approval under section 49 of the South Australian Development Act 1993 in November 2015 for the construction and operation of a 375 MW hybrid wind and solar farm known as the Port Augusta Renewable Energy Park. The project is located approximately 8km southwest of Port Augusta in the coast region bordering the southern Flinders Ranges. The site is approximately 5,400 hectares, occupies both sides of Augusta Highway and falls within the boundaries of Port Augusta City Council and District Council of Mount Remarkable.

We note the variation relates only to the wind farm element of the project and seeks to increase turbine height, diameter and generation capacity.

Whilst Council is supportive of renewable energy development and considers this sector an important part of our region’s economic transition, development approvals must more strongly take into account local values and conditions to ensure our community and other existing industries, such as tourism, are not negatively impacted.

With that in mind, and based on recent experience, there are a number of concerns specifically with regard to the DP Energy variation we ask SCAP to address as part of its consideration:
Visual Amenity on Landscape Protection Zone
DP Energy Australia Pty Ltd have advised that an impact assessment of the variation has been undertaken, concluding that the larger and taller turbines will present only a ‘modest’ increase to visual amenity impact.

Whilst the physical location of the turbines are sited within the Primary Industry Zone, (where windfarms are envisaged) there is no doubt that increasing the size of the turbines will visually intrude - and therefore negatively impact - on the adjacent Rural Landscape Protection Zone.

It should be noted this Landscape Protection zone extends across five Council districts explicitly to preserve the natural and rural character and scenic features of the iconic Flinders Ranges landscape (refer attachment 1).

Any increase in turbine height that increases visual impact on this zone dilutes its intent and may pave the way for allowing incompatible industrial development throughout the Flinders Ranges. This, in our view, is not acceptable. We are aware of other windfarm developer interest in sites within or immediately adjacent this zone near Quorn, Wilmington, Wirrabara and Crystal Brook and would strongly urge SCAP to consider the precedent such development would have on this landscape and to apply such conditions to avoid or minimise this visual intrusion, particularly on the eastern side of National Highway One. It is disappointing to note that no photomontages have been provided that demonstrate the full visual impact of the turbines on this landscape from this key thoroughfare or Horrocks Pass. It is also disappointing the photomontages that have been provided appear to under-represent the visual impact and not provide a realistic representation of the height or scale of the proposed development.

Noise Impact on Residents
Unlike many windfarm developments, we understand the DP Energy proposal takes advantage of the wind patterns of the Upper Spencer Gulf, meaning turbines are expected to peak during late afternoon/early evening, rather than relying on strongest generation (and noise impact) overnight.

Whilst the noise impact assessment by consultancy firm Sonus concludes that the larger turbines proposed by DP Energy can operate in compliance with the relevant EPA guidelines, it does not explicitly guarantee there will be no adverse impact on nearby residents. We note that in recent years, the EPA itself (refer attachment 2) has reported an increase in windfarm noise complaints across the state, including for low frequency and infrasound. We also note recent updates to World Health Organisation guidelines which specifically determined that wind turbine noise can have serious health impacts on residents and very recent research by Flinders University that windfarm noise and vibration impact can cause issues to residents several kilometres away (refer attachment 3).

In light of these recent changes, and appreciating the existing South Australian EPA windfarm noise guidelines are now several years old, we seek further clarification and assurances that nearby residents, including at Stirling North and Point Patterson will not be adversely impacted, particularly given the increased size and output of the proposed turbines.
Traffic Impact
Whilst the main construction access to the DP Energy site is proposed to be from National Highway One, Council is concerned about traffic management and asset damage on adjacent local roads and the impact of dust from the project’s substantial internal road network.

As stated in Council’s original submission to the DP Energy Development Application, Port Augusta experiences dry and windy conditions for most of the year which creates dust that not only affects adjacent properties, but properties several kilometres away.

Recent experience from the Barngala Solar Farm development has reinforced the need for much more stringent vegetation retention and dust management to be applied to major developments that take into account the local conditions. In this example, residences have been significantly impacted by dust on an ongoing basis throughout construction, despite this being a condition of approval.

The Barngala development also highlighted the unintended, but significant, consequence of workforce traffic flows on local roads and the impact on asset maintenance and lifespan that is then incurred by the local Council. Lack of clarity regarding project completion dates and associated ‘make good’ provisions has meant local roads continue to be negatively impacted without any recourse available for the local community.

Rating Equity
Current State Government legislation prevents Councils from rating renewable energy facilities. As a result, there is a substantial inequity in allocating the rating burden, meaning the local community is cross- subsidising these major developments and their impact on local infrastructure and services. For a low socio-economic community like Port Augusta, the effect is even more acutely felt and is further exacerbated following the closure of Alinta Energy’s Northern Power Station and the subsequent loss of close to $1 million per annum in rate income to Port Augusta.

The key aim of rating is to strike a reasonable correlation between the value of a property, the income levels of the owners and their capacity to pay.

It is simply not fair that the existing resources available to the Port Augusta community need to be stretched to accommodate increased pressures generated by significant, highly profitable commercial interests.

Port Augusta Council strongly supports calls from Regional Local Government Associations across South Australia for legislative change to allow Councils to recover appropriate payments in lieu of rates directly from electricity generators. In the absence of legislative change, a contribution required in lieu of payment of Council rates is sought.

In summary, renewable energy is a significant and welcome part of Port Augusta’s future.

The Port Augusta Council and community has a strong track record of encouraging and supporting renewable energy developments, however in recent times this has, unfortunately, been tarnished by a lack of appropriate safeguards for neighbouring residents and limited Council engagement and jurisdiction.
In considering the variation request by DP Energy, we urge the SCAP to address the issues raised in this submission to ensure nearby residents, communities and environments aren’t adversely impacted and our transition to a renewable energy hub for South Australia is a world-leading, positive and fruitful experience.

Yours faithfully

John Banks
Chief Executive Officer
Statewide Wind Farms DPA - Upper Mid North/Lower Flinders Ranges

- Proposed Developer
- Proposed Sites
- Proposed Turbine Footprint
- Future Turbine Footprint
- Existing Turbines
- Local Government Boundary
- Major Road
- Major Town
- Other Towns and Facilities

- Green: Wind Farms explicitly envisaged and Category 2 - wind farms not envisaged having insurmountable barriers to turbine siting.
- Orange: Wind Farms explicitly envisaged and Category 3 - wind farms having insurmountable barriers to turbine siting.
- Yellow: Existing Turbines
- Pink: Proposed Sites
- Red: Proposed Developer

Zoon: used to indicate areas that facilitate wind farms based on zones at 19 October 2014. Zones are based on employer's discretion and are subject to any production needs.

MAP//DATA: provided by DEWNR, processed by PSRW. © Government of South Australia, September 2012.
State of the Environment
South Australia

Environment Protection Authority

2013
Air monitoring in Whyalla
The Whyalla monitoring network measures particle concentrations at residential and near-industry sites across Whyalla. Exceedences of the Air NEPM standard have reduced in recent years as a result of improved industry emission controls and wetter weather (Figure 15).

Air monitoring in Mount Gambier
Air quality monitoring of particle concentrations in Mount Gambier showed numerous exceedences of the Air NEPM standards during winter, resulting in poor winter air quality. The data also showed a decrease in PM<sub>2.5</sub> particles between 2010 and 2011 winter monitoring. Overall, winter patterns of fine particle pollution continued to be consistent with the dominance of wood smoke on cold winter nights. Episodes of pollution comprising coarser particles from sources on the fringes of Mount Gambier were recorded and were possibly contributed by industries in the region.

Spring monitoring in 2011 showed a decrease in fine particles from residential areas and improved air quality, with no exceedences of Air NEPM standards during this period. There was, however, an increase in both PM<sub>2.5</sub> and PM<sub>10</sub> particles from the industrial sector.

3.2.2 Noise pollution
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 has similar effects on the wellbeing of animals, and noise has been shown to affect the reproductive capacity of some animals.

Main sources of noise are:
- industrial noise (including mining, freight terminal operations, etc.)
- transport noise (from roads, vehicles, trains and airports)
- construction and garbage collection noise
- domestic tool and machine noise
- dogs barking.

At present, the most significant noise issues arise from transport (particularly rail). With the proposed increase of residential dwellings adjacent to transport corridors by the 30-Year Plan, there will be an increase in the number of people potentially exposed to noise. However, as detailed in Section 4.3.5, new building code specifications have been put in place to mitigate the noise exposure of residents. Some local councils also provide assistance to reduce noise exposure in existing dwellings, such as the acoustic advisory service and noise management incentive scheme offered by the Adelaide City Council (Adelaide City Council 2013).

The number of noise complaints recorded by the EPA during 2007–12 were:
- 2007–08: 939
- 2008–09: 1029
- 2009–10: 1186
• 2010–11: 1241 (and 329 enquiries; the EPA started recording noise-related enquiries [as distinct from complaints] from 2010–11)
• 2011–12: 1170 (and 354 enquiries).

Although the numbers show a general increase, the following qualifications apply:
• The same person may complain about the same noise source more than once and, as each complaint is recorded separately, this could lead to double counting.
• Noise complaints may be included as a secondary complaint in other complaints and thus not be captured separately.
• The data above is only for complaints made to the EPA and exclude complaints to councils and the police.

The number of complaints to local councils in relation to barking dogs exceeds the total number of complaints about noise from all sources made to the EPA (Table 3). The trend remains stable, indicating that current measures (a fine for the dog’s owner) are ineffective.

### Table 3: Complaints to South Australian councils about barking dogs, 2008–12

<table>
<thead>
<tr>
<th>Year</th>
<th>Metropolitan area</th>
<th>Rural and regional areas</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>2008–09</td>
<td>2767</td>
<td>1479</td>
<td>4246</td>
</tr>
<tr>
<td>2009–10</td>
<td>2638</td>
<td>1838</td>
<td>4476</td>
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<tr>
<td>2010–11</td>
<td>2262</td>
<td>1974</td>
<td>4236</td>
</tr>
<tr>
<td>2011–12</td>
<td>2979</td>
<td>1006</td>
<td>3985</td>
</tr>
</tbody>
</table>

South Australia has a significant wind resource, which has been the focus of development in the renewable energy sector over the past 10 years. The result has been significant development of wind farms across the state, the majority of which have concentrated in the Mid North and South-East regions. In recent years, wind farm installations have been associated with an increase in noise complaints. The focus of these complaints centres on ‘low frequency’ sound output of the wind farm, which is currently the topic of further research by the National Health and Medical Research Council (NHMRC 2010) and targeted monitoring by the EPA.
MEDIA RELEASE

18 June 2019

Wind farm noise ‘annoyance’ possible at 3.5km

Audible and potentially annoying indoor low-frequency noise from a wind farm is present for about 16% of the time at distances up to 3.5km, field data recorded in South Australia shows.

The noise described as ‘thumping’ or ‘rumbling’ – technically referred to as amplitude modulation (or AM) – is related to the frequency of turbine blades passing the tower and power outputs of wind turbines.

While effects on wind turbine noise and sleep are still being investigated, AM is one of the most prominent features of wind farm noise so warrants studies into how commonly it occurs, and what impact it has on people, says Dr Kristy Hansen, from the Flinders University research team.

“In this first study, we found that audible AM decreases with distance from the wind farm but still remained prominent over long distances,” Dr Hansen says.

In the first results from a wide-ranging ongoing scientific study of wind farm noise emissions and potential effects on human sleep, the Flinders experts examined AM at nine houses located at distances where residents have raised concerns about noise and sleep disturbance.

In the residences 3.5km from the nearest turbine, audible indoor AM still occurred 16% of the time, including 22% of the time at night, researchers report in ‘Investigation of a microphone height correction for long-range wind farm noise measurements’ (2019) by Kristy L Hansen, Branko Zajamšek and Colin H Hansen, just published in the Journal of Sound and Vibration (Elsevier).

At distances of 7.6km-8.8km, audible AM was only detected on one occasion.

“The prevalence of AM has not been widely reported either in Australia or worldwide, although it’s well known that it results in increased annoyance in listening tests – and has also been cited in complaints from residents living near wind farms,” says Dr Hansen, who led the study.

An audible indoor low-frequency tone was amplitude modulated at the blade-pass frequency
for 20% of time at 2.4km. Audible AM also occurred for a similar percentage of the day over a broad range of wind farm power outputs of between 40% and 85% of total capacity.

“This indicates that it is important that AM analysis is not restricted to high power output conditions only,” says Dr Hansen, adding wind turbine noise is dominated by low frequencies, can vary up and down in volume – and appear more noticeable in rural areas where background noise such as that from traffic is very low.

In contrast, another new paper, ‘Human perception of wind farm vibrations’ (2019) by Duc-Phuc Nguyen, K Hansen and B Zajamšek, (Flinders College of Science and Engineering, Flinders College of Medicine and Public Health and University of Adelaide School of Mechanical Engineering) published in the Journal of Low Frequency Noise, Vibration and Active Control (SAGE), the researchers found that wind farm vibration is unlikely to cause problems inside residences located 2.4km, 3.3km and 5km from wind farms.

The results are part of a series of early findings from two long-running projects funded by the Australian Research Council (ARC) and the National Health and Medical Research Council (NHMRC) covering the engineering, field, laboratory listening test and sleep measurement aspects of ongoing work.

Flinders University Adelaide Institute for Sleep Health Professor Peter Catcheside, who leads the NHMRC-funded wind farm noise study, says that the main field work is now complete, although further AM and sleep study analysis is still ongoing.

The research team is also examining AM noise and sleep study measurements from more recent field work, and is hoping to compare results against industry data.

“This field work has been very important to help guide the remaining laboratory-based studies now investigating noise effects on sleep,” Professor Catcheside says.

“Based on our noise studies in the field, we will faithfully reproduce key elements of wind farm noise for direct comparison against quiet periods and traffic noise in both day-time listening tests and overnight sleep studies.

“These studies will map out the dose-response effects of wind turbine noise compared to better known traffic noise effects on sleep,” he says, noting that any noise has the potential to disturb sleep and that people perceive and respond to noise differently so it is important to test for potential differences between noise types across a range of people.”

The research team is now seeking people from wind farm areas who feel they are either impacted or not impacted by wind farm noise, people with traffic noise related sleep problems and people from quiet rural areas willing to travel and participate in the Adelaide based laboratory study.

Anyone interested in participating can contact windfarmnoisestudy@flinders.edu.au

For more information contact:

Flinders Media and Communications | 8201 2092 | flinders.edu.au
Media Release
6 June 2017
IMMEDIATE RELEASE

Council Opposes Energy Park Proposal

Elected members voted at the last Port Pirie Regional Council meeting to object in principle to the proposed Neoen Windfarm at Crystal Brook.

Neoen Energy had previously presented to the April Council meeting about a proposed windfarm for the southern Flinders Ranges to include a solar farm installation and battery bank/storage.

Council has supported windfarm projects in the past particularly along the Clements Gap ranges. However, it was recommended that Council support an objection to the proposed Neoen windfarm as some of the wind tower sites would fall within the Port Pirie Regional Council Ranges Zone as identified in Council’s Development Plan 2013.

This Zone specifically describes protection of this area as a location that should not be developed in any way that impacts on the scenic amenity of the Flinders Ranges landscape.

This view was supported by a large number of public attendees at the April Council meeting, including many living in the Beetaloo Valley area.

For further information contact:
Belinda Jackson, Communications Executive on tel. or email communications@pirie.sa.gov.au
Mr Michael Lennon
Chair
State Planning Commission
C/- Department of Planning, Transport & Infrastructure
GPO Box 1815
ADELAIDE SA 5001

1st July 2019

RE: FLINDERS RANGES LANDSCAPE PROTECTION ZONE

Dear Mr Lennon,

The Port Augusta, Flinders Ranges, Mount Remarkable, Northern Areas and Port Pirie Councils all share the Flinders Landscape Protection Zone — which explicitly aims to preserve the natural and rural character and scenic features of the iconic Flinders Ranges landscape.

It is with considerable alarm that we note that, as part of the State Planning Reform, the Department of Planning, Transport and Infrastructure are proposing to remove the landscape protection zone and revert it to a general rural zone.

This is particularly disappointing given that, whilst the Government is clearly seeking to dilute the significance of the Flinders Ranges landscape, the protections for the Adelaide Hills Face Zone, Barossa and McLaren Vale Character Preservation Zones, are proposed to remain in place.

The Flinders Ranges is an important natural landscape that must continue to be protected from inappropriate development into the future, but also allow consideration to expand compatible, low impact landuses.

For example, the Mid North and Upper Spencer Gulf is experiencing significant growth in renewable energy generation. To date this has focussed on windfarms, which have a high visual and community impact, however there is increasing interest in other technologies including solar PV, solar thermal, pumped hydro and utility-scale batteries.

There are also a range of other potential industrial developments including mineral and agricultural processing facilities, transition of the northern forests, expansion of the Mount Remarkable National Park, additional nature-based tourism ventures and inclusion of the Flinders Ranges on the world heritage list.

Ahead of implementation of the statewide planning and design code for regional Councils at the end of 2019, we seek support from the Planning Commission to urgently convene a local Working Group comprising staff and elected members from each of the five Councils and DPTI representatives, to review the Flinders Landscape Protection Zone.

The purpose of this Working Group will be to identify the current and future development pressures on the Landscape Protection Zone, determine appropriate and acceptable forms of future development, assessment criteria and character protection.
The region has some exciting economic growth opportunities before it however we must not undermine the significance of the Flinders Ranges landscape to the cultural, social, natural and economic values of the region.

We seek your support for this request and would be happy to meet with you to discuss how this can best be progressed as a matter of urgency.

To make arrangements for the Working Group, or to discuss this matter further, please contact Rosalie Jones on: [redacted] or email: [redacted].

Yours sincerely

Mayor Peter Slattery  
Flinders Ranges Council

Mayor Brett Benbow  
Port Augusta City Council

Mayor Phil Heaslip  
District Council of Mount Remarkable

Mayor Leon Stephens  
Port Pirie Regional Council

Mayor Denis Clark  
Northern Areas Council

cc: Hon Stephan Knoll, Minister for Planning  
Hon Dan van Holst Pellekaan, Member for Stuart  
Hon Geoff Brock, Member for Frome
The transformation of the Upper Spencer Gulf as a renewable energy powerhouse has taken centre stage, with a major conference in Adelaide dedicated to the region and the wide range of renewable energy technologies that are rapidly emerging.

The “Spencer Gulf Renewable Energy Conference” featured presentations from renewable energy companies, market analysts, the Port Pirie, Port Augusta and Whyalla Councils and the South Australian Government.

Whyalla Mayor Clare McLaughlin said the Upper Spencer Gulf has much to offer and is excited about the future.

“As a region reliant on energy-intensive enterprise such as steel manufacturing, lead and metal smelting and mining, the Upper Spencer Gulf becomes more and more attractive as the price of renewable energy falls and reliability improves”, explained Mayor McLaughlin.

“The renewable energy projects we already know about in the region are just the tip of the iceberg. We have huge potential with a wide range of technologies - pumped hydro, solar thermal, solar photo-voltaic, ‘big’ batteries, wind and hydrogen.”

Port Augusta Mayor Brett Benbow added that the wide range of renewable energy technologies proposed across the Upper Spencer Gulf makes the region an attractive location for further investment and opens up opportunities for research and testing new energy technologies.

“We want to develop a really strong local workforce in this industry and gain the benefit of having the education, training and research opportunities also delivered locally, through initiatives like our Uni Hub”, said Mayor Benbow.

Mr Benbow said whilst there are positives, there also needs to be much stronger local input and control over renewable energy development.

“We really want renewable energy companies to work more closely with us to contribute to local community development and amenity in a more strategic, coordinated and meaningful way.”

“At the moment local Councils often have a limited role as many renewable energy development approvals are taken out of our hands and dealt with directly by the State Government.”

Port Augusta and the other Spencer Gulf Cities have also joined the call from many neighbouring Councils in the Mid North who want the South Australian Government to amend legislation and allow Councils to collect rates from renewable energy companies, as is the case in other states.

“These large renewable energy developments are exempt from valuation for rating purposes, despite there being an impact on ratepayers and Council infrastructure”, explained Mayor Benbow. “We don’t think it’s fair that our local residents and other businesses in our district all contribute to helping to grow and maintain our communities, but a multi-million dollar renewable energy company does not.”

Chair of the Spencer Gulf Cities Association and Port Pirie Mayor Leon Stephens said the conference provided a great opportunity to showcase the region and its potential, but also reinforced the importance of gaining good community support.

“Genuine engagement with Council and the community is really important - you don’t get a social licence by ticking a box. You have to earn it.”
"We also need to be a bit more sensible about where some of this large visual development happens. It’s really important that we have the right development in the right location. We don’t want to see negative impact on local residents or existing industries like tourism."

"Make no mistake – renewable energy is our future and we are really keen to make the most of this potential in the Upper Spencer Gulf", concluded Mayor Stephens. “But in doing so, we want government and developers to work with us more closely and make sure we have the right legislation, the right policy framework and the right attitude moving forward, so that we all win.”
Upper Spencer Gulf Councils are urging the new State Planning Minister, Stephan Knoll, to urgently review the planning assessment, approval and compliance system for large renewable energy projects.

Chair of Spencer Gulf Cities and Port Augusta Mayor Sam Johnson says whilst he is a strong supporter of renewable energy, it must be accompanied by good planning, compliance and commonsense.

“As developers propose to build more and more renewable energy facilities, we need to ensure this is done in an orderly way and is underpinned by good planning and safeguards for nearby residents and landuses.”

“For example, there is no doubt windfarms have a substantial visual impact on the landscape and divide rural communities. I am really concerned that current windfarm planning and compliance is not keeping pace with the size and output of new turbines.”

Mr Johnson also wants to see key iconic landscapes, such as the Flinders Ranges and Clare Valleys, explicitly protected from future windfarm development.

Mr Johnson said there also needs to be much stronger local control over renewable energy development.

“My town of Port Augusta is proud to be home to a number of very significant solar renewable energy projects. Our community has a very strong track record of encouraging and supporting these developments.”

“Unfortunately this has been tamished by the planning and development approvals undertaken by the city based Development Assessment Commission, which failed to give adequate consideration to issues such as dust suppression during construction.”

“We now have nearby residential areas covered in thick dust every day.”

“Because the approval was made by the State Government, Council is powerless to do anything other than join the queue of angry residents trying to get a resolution.”

“Unfortunately, our planning system has not kept pace with the rate of growth in renewable energy developments. The current assessment guidelines for renewable energy doesn’t even mention solar, let alone pumped hydro, batteries or hydrogen.”

“We fully support renewable energy, but we need to be sensible about where we allow huge industrial structures to be located and we need to make sure that our development approval, monitoring and compliance regimes are kept up to date so nearby residents and communities and environments aren’t adversely impacted.”

The Upper Spencer Gulf Councils are also supporting an initiative led by the nearby Central Local Government Region to review options that would allow Councils to rate major developments such as wind and solar farms.

“At the moment, these large renewable energy developments are exempt from valuation for rating purposes, despite there being an impact on ratepayers and Council infrastructure”.

**************END************

Contact: Mayor Sam Johnson, Chair of Spencer Gulf Cities - Mob: **redacted**
Dear Mr Anderson,

The Upper Spencer Gulf is a region in the midst of significant economic transition. Our communities of Port Augusta, Port Pirie and Whyalla lie in close proximity to some of the best and most diverse renewable and low carbon energy resources in the world.

We are very proud to be home to a number of new and innovative large-scale renewable energy initiatives that will help to secure the economic future of our region and energy security for the state.

Our Councils and communities have a strong track record of encouraging and supporting renewable energy developments, however in recent times this has, unfortunately, been tarnished by a lack of appropriate safeguards for neighbouring residents and limited Council engagement and jurisdiction.

With this rapid emergence of new renewable energy technologies, we consider it timely to seek an urgent and thorough review of planning assessment, approval and compliance processes so our communities have confidence in well-planned, orderly development that is underpinned by appropriate protections for nearby residents and landuses.

Key issues include:

• Development of comprehensive, world-leading assessment guidelines and safeguards for new large-scale renewable energy technologies including solar PV farms, solar thermal, pumped hydro, batteries and hydrogen.

• A review of windfarm assessment, including explicit protection of key iconic landscapes such as the Flinders Ranges from future windfarm development.

• Stronger local input and control over renewable energy development assessment conditions of approval, monitoring and compliance, including traffic, dust and noise management.

• Support for local Councils to rate major developments such as wind and solar farms on their capital value.

The multi-billion dollar investment in renewable energy provide our region with a strong base from which we can continue to build on our comparative strengths, as we pursue opportunities that help us become cleaner, more innovative, liveable and economically diverse regional cities.

We are very keen to work with the Planning Commission to make sure that our development approval, monitoring and compliance regimes are comprehensive and up to date so nearby residents, communities and environments aren’t adversely impacted and our transition to a renewable energy hub for South Australia is a world-leading, positive and fruitful experience.

Spencer Gulf Cities representatives would be very pleased to host you and your fellow Commissioners in our region to show you first hand some of the issues we are facing and to have opportunity to discuss this matter with you further. Meeting arrangements can be made by contacting me directly by email: ceo@portaugusta.sa.gov.au, or Melanie Jenkins: or email: ceo@portaugusta.sa.gov.au.

Yours sincerely

Mayor Sam Johnson
Chair

cc: Hon Stephan Knoll, Minister for Planning
RE: RENEWABLE ENERGY PLANNING REVIEW

Dear Mr Anderson,

On behalf of Spencer Gulf Cities, we sincerely thank you and your fellow Commissioners for taking the time to meet with us in the region last month and to view first-hand some of the significant planning and development issues we seek your support to resolve.

As you know, the Upper Spencer Gulf and our communities of Port Augusta, Whyalla and Port Pirie are in the midst of a significant economic transformation.

Major investments in renewable energy, along with minerals processing, aid agriculture, manufacturing, defence and event tourism are providing our region with a strong base from which we hope to continue pushing forward with opportunities that help us become cleaner, more innovative, liveable and economically diverse regional cities.

The economic and cultural connection between the Port Pirie, Port Augusta and Whyalla communities provide unique economic development, land use planning, social and environmental challenges and opportunities that are shared by the three cities, along with our dual functions of providing regional and specialist services for our respective hinterlands.

This dual role, as inter-connected industrial centres and as major geographic service centres means the economic and social impacts experienced by any one of the three cities can trigger a complex web of flow on effects right across the northern part of the state.

Unfortunately, support to the region has long suffered from fragmented and uncoordinated decision-making and resourcing, largely due to the three Upper Spencer Gulf cities sitting across three different Government administrative boundaries, three different Planning Strategy volumes, three Regional Development Australia boards, two different tourism, education, emergency services and Regions SA regions and two Regional Natural Resources Management boards.

Whilst we are currently considering the opportunity to address some of these issues in the longer term through a Joint Planning Board under the new Planning, Development and Infrastructure Act, we do seek your support for an urgent and thorough review of renewable energy planning assessment, approval and compliance processes so our communities can have confidence - sooner, rather than later - in well-planned, orderly development that is underpinned by appropriate protections for nearby residents and landuses.

We again offer our assistance to work with the Planning Commission to make sure that our ongoing transition to a renewable energy hub for South Australia is a world-leading, positive and fruitful experience.

Yours sincerely,

Mayor Sam Johnson
Port Augusta City Council

Mayor Lyn Breuer
City of Whyalla

Mayor John Rohde
Port Pirie Regional Council

cc: Hon Stephan Knoll, Minister for Planning