

---

**From:** Joyleen Koch [REDACTED]  
**Sent:** Friday, 29 November 2019 10:46 AM  
**To:** DPTI:Planning Reform Submissions  
**Subject:** Feedback on Draft-Rural Areas Planning and Design Code

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

**Categories:** Green Category

29/11/2019

Mrs Joyleen Koch  
[REDACTED]  
[REDACTED]

Mr Michael Lennon  
Chairperson  
State Planning Commission  
GPO Box 1815  
ADELAIDE SA 5001

Dear Mr Lennon

Re:Changes to Renewable Energy Policy in the Planning and Design Code

I refer to the discussion paper on proposed changes to the Renewable Energy Policy in the Planning and Design Code (July 2019)

As a landowner and living on our rural property facing a probable wind farm development on the Bundaleer Hills I wish to provide feedback in regards to the proposed changes to planning policy.

As is acknowledged in the draft the advancement in technologies has seen a huge increase in the size of wind towers and also the associated generators from towers being around 150m high with 2MW turbines to proposed towers 240m high with 4.5MW turbines (Crystal Brook Energy Park)

The proposed development by Georgetown Hills Renewable Energy Pty Ltd will have turbines 185m high with turbine MW yet to be informed. Setback distance has only been increased minimally from 1km to 1.2km from non associated dwellings and an additional 10m per additional metre over 150m from township and settlement zones. This is clearly inadequate and puts too many people at risk. I also fail to see why rural/remote families should be discriminated against just because we live in a rural zone. Setback distance should be the same for everyone. The South Australian Flinders University Hansen team recommends at least 3.5km setback for all dwellings based on their measurements at Waterloo wind farm and Hallett wind farm.

I also believe that Wind farm developments should be classed as "Restricted Assessment" in proximity to Cropping, Horticulture and Viticulture areas due to microclimate impacts – (warming, drying and cooling)

With respect to Public Notification – all wind farms should be a Category 3 with appeal rights and require public notification. The exception in remote areas zone if the turbine is more than 2km from the dwelling - excluded from notification - is once again discriminating against remote area residents

I also have a concern which is not detailed in draft documents. Currently the school bus route runs at the base of the Bundaleer Hills picking up students from rural residences to travel to both Primary and High Schools in Gladstone. With the proposed development of a wind farm on the West Bundaleer range with turbines proposed to be 185m high there will be an issue with Shadow Flicker along this road during the morning at the time that children will be transported by bus. There is no alternative route for these rural children to be collected by bus. Therefore I believe that planning policies should address this issue and mitigation should specify software engineering solutions to turn off specific turbines during certain hours of the day.

I ask that the above points be seriously considered as the impacts both visually and from noise from these larger turbines will be much greater.

Yours sincerely,

JOYLEEN KOCH