Q1 Which part of the Planning and Design Code would you like to make a submission about? (Please click the circle to select which part of the Code you wish to comment on. You can also see which council areas are included in the rural and urban code via the links below.)

My submission relates to Urban code. (click here for council areas)

Q2 Please provide your contact details below (Name, Postcode & Email are mandatory) Please be advised that your submission will be made publicly available on the SA Planning Portal.

Name: Pamela Pilkington
Address: Port Pirie Regional Council  
Suburbs/Town: Crystal Brook 
State: SA  
Postcode: 5523  
Country: Australia

Q3 Which sector do you associate yourself with? General Public

Q4 Please upload your PDF template for submission here (pdf only)

Renewable Energy Planning and Design Code Discussion Pam Pilkington.pdf (177.6KB)
Q5 Please enter your general feedback here

Please refer to attached file - Renewable Energy Planning and Design Code Discussion Pam Pilkington.pdf
“State Planning Policies - Policy 12 Energy -...” “The planning system also plays a role in reducing the impacts of energy infrastructure, including visual amenity, noise, public safety and maintenance.”... 

SSP 12 provides support for the development of energy assets and infrastructure which are able to manage their impact on surrounding land uses, and the natural and built environment.”

• The term “manage” is ambiguous. It is absurd to state that windfarms with wind turbines up to 240 metres in height, built on the crest of ridgelines, can “manage” their impact on surrounding land uses, and the natural and built environment. What does the term “manage” imply in this context? If it means to command or control, that would certainly be the case. It’s hypocrisy to suggest that turbines on top of ridgelines can be ‘screened’ by planting a few trees, but then policy dictates that buildings a few metres high, housing administration and storage also be screened with trees, when the ridgeline in the background is peppered with 240 metre high industrial monstrosities.

• The visual impact of energy infrastructure has, and continues to proliferate exponentially, not reduce, especially in the Mid North of South Australia. The accumulative effect, with the current, approved, and proposed projects, will consist of a continuous visual aspect of wind turbines along ridgelines from Lochiel in the south through to Crystal Brook, then east all the way to Hallett and south again to Waterloo and beyond. There needs to be a definition of acceptable visual impact – windfarms visually isolated, instead of uninterrupted vistas of windfarms. The increase in height to almost double earlier turbines, will have an even greater visual impact because of their sheer enormity even though the area footprint will be less than if there were more of the smaller turbines.

• In addition, close proximity of wind projects is putting at huge risk the loss of bird and bat species, especially the large predatory species such as wedge-tailed eagles which are well documented to be decimated in the presence of turbines. To risk the decline of bird numbers over such a large contiguous tract of land, is to put at risk the whole flow-on effects on the biodiversity of the Mid North landscape. I wonder how much longer I’ll be able to witness the pair of wedge-tailed eagles that circle over our property, once the Crystal Brook Energy Park is commissioned.

“Noise” – This area of current and proposed policy is grossly inadequate to protect public safety, and major amendments and reforms are essential in the future. It is imperative that as well as audible sound, that inaudible noise, and the measurements of amplitude modulation(AM), infrasound and low frequency sound, are included in the Development Application, during the planning and approval procedure. How can approval be allowed to be granted, when in some cases, for example Neoen’s Crystal Brook Energy Park’s proposed turbines, had never been built anywhere in the world, not even a prototype, so never been tested, prior to the project being granted approval by the Planning Minister?
The output is 4.8MW, approximately double the earlier built turbines. There is no way of knowing whether the turbines meet the Code or not, until after they are installed and operating, and that is too late. If proven that they don’t meet requirements which encompasses both audible and inaudible sound, litigation may become the only avenue available to citizens to redress the problem, which would be most undesirable for all involved. Who is going to enforce monitoring, who will impose penalties, and what will those penalties be? These factors all ought to be clearly defined. Noise limits should be consistent for all non-host residents, in all zones – there should not be any differentials.

A comprehensive, rigorous Wind Farm Noise Study (WFNS) is currently being conducted by Flinders University and the University of New South Wales, funded by a National Health Medical Research Council grant, to determine the effects of wind farm noise on sleep disturbance and the risk of adverse physiological health effects. Preliminary findings of the scientific research have indicated audible noise has been detected many kilometres from homes and that audible AM has been recorded at distances of 3.5kms from the nearest turbine. This is far greater than the proposed new code setbacks of 1.2kms for non-associated dwellings, or for 2kms plus 10 metres for each additional metre of over 150 metres in height, which for 240 metre turbines only equates to 2.9kms, from townships. The proposed setbacks could well be proven to be grossly inadequate to protect the health, safety and welfare of South Australian citizens. Planning guidelines should regard that as number one priority. In 2014, the Liberal Party of SA claimed that “We will protect residents by banning new wind turbines from being built closer than five kilometres from an existing home.” Setbacks need to be vastly increased in response to the increased size and output of turbines proposed. When the WFNS findings are eventually released, those results ought to form the basis to determine safe setback distances.

A moratorium ought to be placed on future windfarm approvals until the findings of this study are published and considered, and this policy should not be enacted until such time. A precautionary approach must be adopted.

- **SOLAR** – Solar farms should be sited on unproductive land, or grazing land where livestock can still roam and graze between the panels, not on good quality, productive, arable cropping land which is a limited resource in South Australia.

- **DECOMMISSIONING** – Even though it might seem a long time into the future, the time for decommissioning, for solar and wind projects, as well as battery storage components, is inevitable. All of these components comprise substantial quantities of toxic waste, which must be disposed of appropriately and safely. With such an expansion of projects in the renewable energy sector currently, will come an equally vast flood of decommissioned components in one to three decades time, or sooner if components are damaged by storms or hail. Many of these components cannot be recycled. Overseas, there are currently huge dumps of toxic components being buried in mass landfills, whereby toxic materials can leach into the soil and groundwater.

This predicament must be addressed now and specified in the Development Applications. The Planning and Design Code should list, inter alia, the processes and timelines for decommissioning, responsible parties for overseeing safe procedures, and future monitoring, and legislation to enforce penalties when compliance is not met.

I urge the DPTI Planning Reform team to thoroughly consider recommendations and suggestions made in this discussion paper process on proposed changes to the Renewable Energy Policy in the Planning and Design Code, and not to merely “tick the box” that consultation has taken place. People who take the opportunity to respond to these discussion papers, are generally time poor and would prefer to spend their time more enjoyably, so please appreciate and heed to their contributions, consider carefully and act upon the recommendations of those who have contributed to “Have you say”.