Dear Mr Lennon

Proposed Changes to Renewable Energy Policy in the Planning and Design Code

We are residents of the Mid North where there are a plethora of operating wind farms and have experienced first-hand the impact of these industrial developments on people, communities and the environment. As such, we submit the following feedback on the Discussion Paper on Proposed Changes to Renewable Energy Policy in the Planning and Design Code.

Setback Distances

The setback distances proposed in the Discussion Paper are not adequate to ensure the health and safety of the public. The increase in turbine height and generation capacity is acknowledged in the Discussion Paper but, for the proposed 10 metres per additional metre over 150 metres of the turbines, no scientific evidence has been cited nor does it explain how this setback distance is derived.

The expansion of wind farm facilities in Australia has been associated with widespread community complaints regarding noise, sleep disturbance and adverse health effects. Many of these complaints are from people living further away than the setbacks proposed.

The Discussion Paper is quite misleading when it discusses public health concerns. The Discussion Paper states that the National Health and Medical Research Council (NHMRC) in 2015 have found no peer reviewed evidence that exposure to wind farms affects a person’s health and wellbeing. **This is only half of the 2015 NHMRC Statement.**

The NHMRC Statement: Evidence on Wind Farms and Human Health 2015 goes on to say “Given the limitations of the existing evidence and continuing concerns expressed by some members of the community, NHMRC considers that further high quality research on the possible health effects of wind farms is required”. The Discussion Paper fails to mention that significant studies are still being conducted. This is a substantial omission. If research is still being undertaken and the health impacts are unclear, then a cautious approach should be taken and the setback distance set out in the Discussion Paper must be extended to ensure that the health and wellbeing of the public is not compromised.
Professor Colin Hansen, from the University of Adelaide has done a lot of work into wind farm noise. He recommends a 5 km setback from homes. Dr Kristy Hansen, who is currently doing research into wind farms at the Flinders University, has measured audible tonal AM (Amplitude Modulation) at residences 1 to 9 kms from a wind farm. This suggests that 5 to 9 km setbacks are safer and more realistic than those set out in the Discussion Paper.

In addition to this, the EPA guidelines are currently under review. According to Stephen Cooper, of The Acoustic Group (Consulting Acoustical and Vibration Engineers), who has also done much work into the subject of wind turbine noise, the current EPA Guidelines are severely inadequate.

In his submission to the EPA 30 September 2019, Cooper states; “The South Australian EPA are responsible for the provision of inadequate wind farm noise guidelines that have failed to protect the amenity of residents. The draft guidelines need further amendments and must provide the appropriate material so as to ensure the SA EPA fulfil their statutory obligations to protect communities from adverse noise and environmental impacts as a result of the operation of wind farms”.

Without up to date EPA Guidelines (and one can only hope that the EPA have listened to experts such as Hansen, Hansen and Cooper during the consultation process) we wonder how the proposed setbacks of only 2 kms and 10 metres for each additional metre over 150 metres in overall turbine height from townships can be decided upon.

The Discussion Paper proposes two different setback limits – one for townships and one for individual non-associated dwellings. This is inequitable and we do not support different setback distances. It is possible that there are more individual dwellings around a wind farm than within the township zone. An example of this is the proposed Palmer wind farm where some residents have done an informal count and found that the number of residents outside the town but near the wind farm far outnumbers the number of residents within the township. The setbacks therefore must be the same for dwellings and for township zones.

**Cumulative Impact**

The planning approach to wind turbine developments is currently unco-ordinated. In the development approval process each wind farm is currently assessed individually and there is no weight given to the size and number of other wind farms in an area. The Discussion Paper acknowledges that current planning policies do not provide explicit guidance on the cumulative impacts of renewable energy developments on neighbouring land, as each development is generally considered on its individual merits. However, the Discussion Paper does not mention how the policy will be changed to address this important issue. We live in an area where there are 9 wind farms operating, 1 under construction and 2 in the planning phase all within a 45 km radius of our home. This equates to hundreds of wind turbines. We ask: How many more are to be built? Who decides how many is too many? Or will the policy makers only be happy when every ridge top in the Mid-North is covered with wind turbines? The Renewable Energy Policy must provide answers to these questions and address the issue of cumulative impact.
Decommissioning and Rehabilitation of Renewable Energy Sites

The inclusion of a policy to address this aspect is commendable. However, to think that rehabilitation can occur is somewhat naïve. Please understand that wind turbine facilities have a massive footprint which includes huge concrete foundations containing upwards of 20 tons of concrete, road works, and hard stands. Another consideration is how the actual turbines and blades will be disposed of. We understand that wind turbine blades cannot be recycled so this begs the question of how they will be disposed of. Obviously any policy relating to decommissioning must be clearly detailed addressing the above issues along with heavy penalties for non-compliance including rejection of any other development applications from the non-complying company and its subsequent owners. There also needs to be a mechanism for oversight and monitoring of the decommissioning process.

Public Notification

Because of the enormous scale and impact of wind farm developments as outlined above, we agree that the public must be notified of all wind farm proposals. However, all affected residents should also have appeal rights.

Protection of Primary Production

We attended the SA Planning Commission Renewable Energy Forum held in Eudunda on 3 December 2019 where the impact of wind turbines on primary production was discussed. Several farmers raised the issue of damage to crops caused by frost. One farmer said that, in the last six years he had 70-100% damage to his crops from frost, which he attributed to the nearby wind farm which has been in operation for those 6 years. This aspect is not mentioned in the Discussion Paper. Surely it is up to the policy makers to further investigate the possible impact of wind turbines on crop production. Food security is an important issue and this aspect should be considered and addressed within the policy.

Visual Impact

The Discussion Paper does not give consideration to reducing the visual impact of the wind turbine developments. The vast majority of wind turbines in South Australia are installed on ridgelines. They can be seen for many, many, kilometres around thus severely diminishing the visual amenity. The policy needs to state that wind turbines need to be placed where there is the lowest impact on visual amenity. Countries we have visited throughout Europe have wind farms that are often not located on ridge tops but are located on flat land, and they seem to work satisfactorily. Our questions is: why can this not happen in South Australia?

Another way of reducing impact is to restrict the size of the turbines. For example in metropolitan Adelaide there are restrictions to building heights etc. Consideration should be given to this in rural areas as well to ensure equity.
Geographical Considerations

The Discussion Paper does not mention geographical considerations. Topography plays a significant role in the transmission of noise. For example people living 10 kms away from wind turbines have reported constant noise disturbance even though they cannot even see the turbines. The idea that you can just draw a line on a map and say that 2 kms (for example) is an adequate distance from a turbine shows no scientific basis and is a very lazy and simplistic approach to wind farm planning. Obviously different geographic situations require different solutions.

We know this because we live in a valley that has the Horrocks Highway passing through it. At times we can clearly hear trucks and cars many kilometres away, and other times not hear a thing. This is all to do with atmospheric and geographic conditions. The nearest wind farm to us is 40 kms away and yet, under certain conditions we are able to hear/feel the sound from these!!!!

Telecommunications

There have been reports that telecommunications have been affected following the installation of wind turbines. This problem is not mentioned in the Discussion Paper but deserves consideration given the isolating effect this can have on rural communities.

Complaints

The policy needs to provide clear direction on how complaints can be made. In addition, an appeal mechanism must be included and a review by an independent body provided. In our experience, even when complaints are made, little or no action is taken to remedy the situation. The policy should detail what people with complaints are required to do, and what they can expect from the Government Department responsible, and what the wind farm company’s obligations are. The policy would also need to detail who is responsible to oversee this.

We trust that our feedback will be considered in the finalisation of this very important Renewable Energy Policy which affects the lives of many rural people.

Yours sincerely

Elizabeth Traeger and Dennis Dale