

**To:** [DPTI.planningreformsubmissions@sa.gov.au](mailto:DPTI.planningreformsubmissions@sa.gov.au)

**Re:** Phase Two – Draft Planning and Design Code - Rural Areas

**From:** Mary Morris

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**Name of nearest proposed or operating wind farm:**

Proposed Twin Creek wind farm

Operating Waterloo wind farm stages 1 and 2.

**Comments on Wind Farm aspects of the Draft P&D Code – Phase Two**

**1. Balancing Amenity Rights with the “imperative” for more wind energy installations.**

**SA has 2142 MW** of installed wind power plants currently operating<sup>1</sup> (Table 1.)

AEMO already requires the total power from SA wind farms to be **constrained to 1295 MW** at any point in time.

The Planning Commission cannot legitimately justify shoe horning more wind energy projects into the settled areas of this State thereby subjecting more rural residents to unacceptable amenity impacts when AEMO already limits the amount of wind energy which can enter the SA grid.

Consequently, it is completely unacceptable to many residents in the Rural Areas that more wind farms would be envisaged in such close proximity to their homes as proposed by the Draft Code Phase Two (ie 1200 metres). I will provide further detailed comments on setbacks in response to the Renewable Energy Discussion Paper. It was disappointing to see that the Draft Code has not taken into account the impact of siting turbines at height on a ridgeline overlooking dwellings on lower ground or the acoustics research carried out by the University of Adelaide and Flinders University at operating SA wind farms since 2011. A minimum 3.5 km setback is recommended.

**Table 1. Capacity of Operating wind farms in South Australia on 29/11/2019**

South Australia (SA1)		
AEMO code	Wind farm name	MW
BLUFF1	The Bluff Wind Farm	52
CATHROCK	Cathedral Rocks	66
CLEMGPWF	Clements Gap Wind Farm	57
CNUNDAWF	Canunda Wind Farm	46

<sup>1</sup> <https://anero.id/energy/wind-energy>

HALLWF1	Hallett 1 Wind Farm	94
HALLWF2	Hallett 2 Wind Farm	71
HDWF1	Hornsdale Wind Farm	102
HDWF2	Hornsdale Wind Farm 2	102
HDWF3	Hornsdale Wind Farm 3	112
LGAPWF1	Lincoln Gap Wind Farm	212
LKBONNY1	Lake Bonney Wind Farm Stage 1	80
LKBONNY2	Lake Bonney Stage 2 Windfarm	159
LKBONNY3	Lake Bonney Stage 3 Wind Farm	39
MTMILLAR	Mt Millar Wind Farm	70
NBHOWF1	North Brown Hill Wind Farm	132
SNOWNTH1	Snowtown Wind Farm Stage 2 North	144
SNOWSTH1	Snowtown South Wind Farm	126
SNOWTWN1	Snowtown Wind Farm Units 1 And 47	99
STARHLWF	Starfish Hill Wind Farm	34
WATERLWF	Waterloo Wind Farm	131
WGWFF1	Willogeleche Wind Farm	119
WPWF	Wattle Point Wind Farm	91
<b>Total operating</b>		<b>2,142 MW</b>

## 2. Agency Referrals

Code says:

Environment Protection Authority to provide "direction" (instead of existing system of "advice" only).

Response

This is an improvement. All preconstruction noise reports, and post construction noise monitoring plans and post construction noise reports should be independently audited as per Victorian EPA system.

All noise reports and audit reports should be made publicly available on line.

Other consultants' reports should be subject to independent audit e.g. ecological studies, shadow flicker, aviation.

## 3. Wind farm Assessment Type

Code says:

"Performance Assessment" on rural land (e.g. Rural Zone)

"Restricted Assessment" in Significant Landscape Protection Overlay and Character Preservation Districts Overlay

Response

All wind farm proposals in the Rural Areas should be classed as "Restricted Assessment" especially in proximity to Cropping, Horticulture and Viticulture areas due to microclimate impacts – warming, drying and cooling

## 4. Planning Authority making the Assessment

Code says

Council Assessment Panels for "Performance Assessment"

State Commission Assessment Panel for "Restricted"

Response

From my experience with several local wind farm assessments, (Waterloo stage 2 wind farm , Stony Gap wind farm, Palmer wind farm, Twin Creek wind monitoring mast) Council Assessment Panels are not adequately resourced to seek peer review of consultants reports and are more likely to rubber stamp wind farm approvals without question, as opposed to the higher level of scrutiny applied by the SCAP panel members. Recommend all wind farm assessments be via SCAP.

## 5. Public notification

*Code says:*

*Category 2 where it meets the required setbacks.*

*Category 3 in other cases*

*All wind farms will require public notification*

*In Remote Areas Zone if the turbine is more than 2 km from the dwelling – it is excluded from notification*

*Additional notification and appeal rights for “Restricted”*

Response

The National Wind Farm Commissioner’s Annual Reports identify that residents within 5 km of a wind farm may be affected, not just adjoining landowners

All wind farms should be category 3, with appeal rights

The draft code discriminates against residents in remote areas who are accustomed to a quiet noise environment and naturally uninterrupted skyline views.

Public notification and appeal right should apply to all wind farms

## 6. Environmental impact policy

*Code says:*

*General policy seeking minimisation of impact (vegetation removal and bird / bat strike)*

Response

Code is far too vague and generic and is far more relaxed than the Eastern States.

Environmental code needs to be more prescriptive e.g. defined raptor nest setbacks, surveys and reporting.

Some developers apply a 500 m nest buffer, yet Waterloo wind farm stage 2 developers ignored the NYNRM written advice to provide 500- 1000m buffer for a wedge tailed eagle nest and proceeded to build 3 turbines within 500 metres of that nest. Stony Gap wind farm provided no eagle nest buffers , yet the same ecological consultant recommended 500 m buffers for all wedge tailed eagle nests ( CERES project, Palmer wind farm, Hornsdale wind farm, Keyneton wind farm,, Twin Creek wind farm all had 500 m buffer)

Monitoring and reporting should be mandatory, reports audited and publicly available as in NSW, VIC and Tasmania.

Suggest that Department of Environment and Water and Native Vegetation Council Assessment Panel should provide “direction”, not just advice.

Need to consider the impact of noise and shadow flicker on fauna living within the footprint.

Post construction surveys should be required to quantify the impact on disturbance sensitive species.

To date, NO post construction studies have been done in SA to quantify the impacts on bird and bad species.

Apparently DEW has been provided with no wind farm operator reports quantifying the impact individual wind farms or the cumulative impact on the Mid North Agricultural District in the Northern and Yorke NRM.

Councils do not appear to enforce compliance of Consent conditions e.g. In the 9 years since that wind farm commenced operation, Clare and Gilbert Valleys Council has not enforced the Waterloo wind farm stage 1 consent condition that waterbird surveys must be carried out when Porters Lagoon is filled with water.

## 7. Shadow Flicker

This is hardly mentioned in the Draft P&D Code or Renewable Energy Discussion paper, yet with larger turbines the shadow flicker goes a much greater distance. This is exacerbated when turbines are sited at elevation compared with dwellings .

Mitigation should specify software engineering solutions to turn off specific turbines during certain hours of the day. Screening from tree planting is not a sufficient or practical remedy.