

20<sup>th</sup> November 2019

Mrs Genevieve Wells



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 resident of the mid north town Crystal Brook which is facing a towering wind farm just north of our community, I wish to provide the following feedback in regards to the proposed changes to planning policy.

As is acknowledged in the draft the advancements in technologies has seen a huge increase in the size of wind towers and also the associated generators. Previous wind turbine height has been around 150 metres with generator capacity of around 2 MW to proposed wind turbine heights (Crystal Brook Energy Park) of 240m with turbines of 4.5MW. This is a 60% increase in height and a 100% increase in generator size and yet the setback distances for residences has only increased from 1km to 1.2km (a 20% increase) from non-associated dwellings and an additional 10 metres per additional metre over 150 metres from township and settlement zones. This is clearly not adequate and puts too many people at risk. The Flinders University are currently undertaking a study and have released interim findings that amplitude modulated noise has been found more than 16% of the time during the day and 22% of the time at night just 3.5kms from wind turbines in South Australia. Professor Colin Hansen (one of the researchers) has publicly called for a minimum setback distance of 5km. The World Health Organisation has acknowledged this amplitude modulation is a health hazard (<https://www.euro.who.int/en/media-centre/sections/press-releases/2018/press-information-note-on-the-launch-of-the-who-environmental-noise-guidelines-for-the-european-region>) which contradicts the 2015 NHMRC review quoted in the draft. The NHMRC review also focussed on much smaller towers and turbines than what will be built under the new guidelines.

The importance of this new evidence regarding noise is confirmed by the EPA which saw fit to release its own draft for consultation earlier this year "Environmental Noise Guidelines for Windfarms (2019)" and acknowledged both of these reports. The EPA have not as yet released their response to the consultation. I find it concerning that the State Planning Commission can list referrals to the Environment Protection Authority in its summary table when future regulation regarding windfarm noise is unconfirmed and under review.

Given the new scientific evidence of the effects of wind turbine noise and also the increased visual impact of the much taller turbines, I believe it would be irresponsible not to put sufficient setback distances in the new planning policy and that a 5km setback from **all** dwellings should be implemented.

I also have concerns about the use of "Overlays" to restrict environmentally and culturally significant areas. Surely some areas such as the Flinders Ranges should be protected as a matter of priority in a stronger manner than overlays which can be misinterpreted and manipulated in future.

I respectfully ask the Planning Commission to consider the points made above as the impact of modern wind turbines will be much greater. Rural communities have already been severely impacted both visually and from noise from turbines which are too close to dwellings. There are areas of much less population which should be considered well before those which are currently being approved and appropriate setback distances from dwellings would ensure this protection is adequate.

Yours sincerely

*Genevieve Wells*

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