

Mr Michael Lennon
Chairperson
State Planning Commission
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16 October 2019

RE: PROPOSED CHANGES TO RENEWABLE ENERGY POLICY

Dear Mr Lennon,

Thank you for the opportunity to provide feedback on the proposed changes to renewable energy policy in the planning and design code.

There is over \$15 billion investment proposed or underway in the Upper Spencer Gulf, and potentially up to 9,000 jobs, across a range of renewable energy, mining and processing, defence, value-added agriculture, event and nature-based tourism.

Whilst this is positive for the region, the Port Pirie, Port Augusta and Whyalla Councils are seeking much closer government collaboration around workforce, infrastructure and development planning to ensure flow-on impacts and any unintended consequences are managed and positive benefits are maximised.

As highlighted in previous correspondence to you, our Councils and communities have a strong track record of encouraging and supporting renewable energy developments, however in recent times this has on occasions been tarnished by a lack of appropriate safeguards for neighbouring residents and limited Council engagement and jurisdiction.

In this regard Spencer Gulf Cities welcomes the review of renewable energy planning assessment, approval and compliance processes. We are very pleased to note the policy recognises the changing mix of renewable energy generation, and makes some provision – even if only notionally – for solar photovoltaic arrays, solar thermal plants, grid-scale batteries, biofuels facilities and pumped hydro systems.

We would encourage the Commission to continue to closely monitor expansion of these new technologies (for example pumped hydro, 'green' hydrogen) and to update the planning and compliance criteria as deployment occurs, to ensure any adverse impacts on the community, environment or adjoining landuses are recognised and mitigated as early as possible.

In the meantime, the ongoing installation of large-scale wind farms remains a highly contentious issue for our Councils and communities.

Whilst we note some amendments have been made to the planning policy in relation to this form of development, a number of key issues have not been addressed, despite being repeatedly raised by local government and impacted communities over several years. Key, unresolved issues include:

Visual amenity on the Flinders Range

It is disappointing that calls from Councils for stronger dialogue and establishment of a working group to ensure the character of the iconic Flinders Ranges landscape is protected from inappropriate development into the future has not been forthcoming.

Cumulative Impact

Whilst cumulative impact has been noted in the policy discussion, it is disappointing that there is no explicit guidance or assessment criteria for this to be formally considered. As more windfarms continue to be installed and proposed across the Upper Spencer Gulf and neighbouring Mid North, the cumulative impact on visual amenity, noise, telecommunications, the environment and other landuses like tourism, must be taken into account.

Noise and Setback from Residences

The proposed differential setback distances between residences located within or outside townships/settlements remains inconsistent and inequitable. Residents should expect the same level of protection, regardless of where they live. Furthermore, these distances remain inadequate considering recent academic research from Flinders University concluding that noise impact from wind turbines can extend to 8km and is common at 3.5km.

In this regard, it would appear logical that the policy be amended to require a minimum setback of 3.5km to any non-associated residence, regardless of whether they are within or outside a town boundary.

It is also disappointing that, despite acknowledging that wind turbines are now double the height and double the output of earlier developments - and despite the South Australia EPA themselves reporting an increase in windfarm noise complaints across the state, including for low frequency and infrasound – noise protection requirements are proposed to remain as per the current system.

The Commission should note that the statement within the Discussion Paper that 'there is no evidence that exposure to wind farms directly affects a person's physical or mental wellbeing' is both false and misleading.

The study actually found consistent evidence that noise from wind turbines is associated with sleep disturbance, poorer sleep quality and quality of life. Furthermore, in 2018, updates to World Health Organisation guidelines specifically determined that wind turbine noise can have serious health impacts on residents. More recently, peer-reviewed academic research by Flinders University found windfarm noise and vibration impact can cause issues to residents several kilometres away.

Factually incorrect statements like this do little to restore confidence by communities that the government is genuine about improving safeguards and protections for residents living nearby these industrial developments.

Traffic Impact

Councils remain concerned about traffic management and asset damage on local roads and the impact of dust from construction and the often substantial internal road network of renewable energy developments, noting this concern extends beyond windfarms to other forms of renewable energy development.

It is the experience of Councils that dust mitigation conditions applied to renewable energy development approvals often do not adequately take into account local conditions.

A number of recent renewable energy developments in the region have also highlighted the unintended, but significant, consequence of workforce traffic flows on local roads and the impact on asset maintenance and lifespan that is then incurred by the local Council. Lack of clarity regarding project completion dates and associated 'make good' provisions has meant local roads continue to be negatively impacted without any recourse available for the local community.

Stronger and more genuine and considered engagement with local government as part of the assessment processes, particularly for Section 49 Crown Sponsored projects, is encouraged in order to understand and apply conditions suited to the local conditions.

Rating Inequity

Current State Government legislation prevents Councils from rating windfarms and other renewable energy facilities. As a result, there is a substantial inequity in allocating the rating burden, meaning the local community is cross-subsidising these major developments and their impact on local infrastructure and services.

It is considered grossly unfair that the existing resources available to regional communities should be stretched to accommodate increased pressures generated by significant, highly profitable commercial interests.

Spencer Gulf Cities strongly supports calls from Regional Local Government Associations across South Australia for legislative change to allow Councils to rate renewable energy facilities as they are able to apply to any other industrial development.

In summary, renewable energy is a significant and welcome part of the Upper Spencer Gulf's future.

We reiterate that expansion of renewable energy facilities must be well-planned and orderly and must be underpinned by appropriate protections for nearby residents and landuses.

Whilst we applaud the intent of the renewable energy policy review, the provisions remain largely inadequate for the task ahead.

We once again encourage the Commission and Department to strongly and genuinely engage with regional Councils who have substantial first-hand experience managing both the positive and negative impacts of these developments, in order to strengthen the policy ahead of its implementation.

Yours sincerely



Mayor Leon Stephens
Chair – Spencer Gulf Cities

Attachments:

- Port Augusta City Council – concerns regarding DP Energy Windfarm Stirling North
- Port Pirie Regional Council – opposition to Neoen Windfarm Crystal Brook
- Flinders Ranges, Port Augusta, Mount Remarkable, Northern Areas, Port Pirie Councils – concern regarding windfarms and the Flinders Ranges Landscape Protection zone.
- Spencer Gulf Cities – previous correspondence to the State Planning Commission 2018
- Spencer Gulf Cities – media release regarding "Rating Equity for commercial and industrial landuses outside towns in South Australia" report, 2018