

Rural Wind Farms – review by Federal Senate Committee – Submission from Northern Areas Council

The Northern Areas Council is located within the Mid North region of South Australia, just over 200 kilometres north of Adelaide, whose area is a prime focus for wind farm development. The Mid North part of the State is becoming known locally as the 'wind farm capital of Australia' because of the favorable prevailing wind conditions to power the turbines and the consequent interest from operators wishing to take advantage of these. Within the Council district, there are already 108 turbines operating (45 at the Brown Hill complex and 63 at North Brown Hill) and a further 70 turbines approved but not yet developed as part of the Carmodies Hill complex.

Although, initially, there did not appear to be much strong local opposition to the earliest wind farm proposal (approved in late 2004), Council is increasingly aware that members of the community are not now as readily accepting of their development and are starting to raise concerns not only about the perceived impacts arising from the wind farms themselves but also the sheer number of proposals (real and rumoured) to establish wind farm developments.

To provide but one example of this emerging uneasiness, the *Collaby Hill Wind Farm Action Group* has been formed to oppose the possible development of a wind farm in the Beetaloo Valley (which is mostly within this Council's area) but is taking on a larger role of publicising and informing opinion as to the potential dangers of wind farm development in a broader sense.

Council has a statutory role under the *Development Act 1993* to act as the planning authority in its district and to assess and decide upon development applications made. Wind farms are classed as development that requires an approval from the Council (unless the State Government, through the Minister, decides otherwise and calls in an application using the powers available under the Act for State assessment and decision). Council's Development Assessment Panel is the body that actually makes the decision in Council's name. Pursuant to the Act, all Councils in the State are obliged to set up such a Panel for the purposes of making decisions on development proposals. In assessing and reaching a planning decision, the only relevant matters that may be taken into account are the policies outlined in the Development Plan, which is the statutory document created under the Development Act that contain the zones, maps and written rules (ie the 'policies') which guide property owners and others as to what can and cannot be done on any piece of land in the area covered by the Development Plan.

In respect to the policies applicable to *Renewable Energy*, these were inserted into many Council Development Plans across the State in July 2003 by the Minister for Urban Development and Planning. In other words, this is **State** policy, not local, and Councils are obliged to use these planning policy guidelines when dealing with wind farm proposals. A Council's ability to unilaterally change, add to, modify, strengthen or tighten these established policies is very much limited. A Council is unlikely to 'win' any argument with the Minister to accept amendments and additions to his own State-wide policies. Such policy would have to be changed uniformly across the State as a whole, ie the Minister would have to agree to review and implement any amendments.

As a result of this Council recently pursuing an amendment to its existing Development Plan, in accord with the consultation process laid down in the Act which attracted several public submissions that were critical of the current Development Plan policy framework applying to wind farms. As Council's hands were largely tied regarding any possible upgrading of the existing Ministerial policy, Council followed these concerns up separately by writing to the Minister recommending that he agree to instigate a comprehensive review of the *Renewable Energy*

Facilities policy taking into account recent research and related studies as to potential impacts and identify contemporary 'best practice' planning policies to address such impacts. Council pointed out that the existing policy is now nearly 8 years old (determined largely before wind farm developments took off in a big way) and has not been comprehensively re-examined since that time in terms of assessing and better understanding local wind farm experiences and impacts, and whether the policy framework is still up to the job. We would now have a more practical knowledge of how wind farms work and are in a better position to measure these impacts to determine if the planning guidelines need strengthening or not.

The objectives and principles of development control in the current Development Plan tend to cover the relevant issues in a broad sense but are not that precise or detailed when it comes to applying what read as 'motherhood' statements to specific individual proposals on particular local sites in order to determine an acceptable planning outcome. The policy statements are open to interpretation and subjective judgement as to which policies have respective weight and may have precedence over the others and which are important to apply to local areas exhibiting particular characteristics in order to more plainly quantify the impacts in terms of an approval or refusal.

The public submissions strongly expressed the view that the *Renewable Energy Facilities* policies contained in the draft amendment to Council's Development Plan (a reiteration of the Ministerial policy) are deficient and do not adequately deal with protecting residents and the environment from perceived adverse impacts resulting from the operation of wind turbines. Moreover, there is growing community concern about the increasing number of wind farms being established in the Council area.

They further believed that any additional wind farm development needs to be more carefully evaluated otherwise the rural landscape will be converted into an industrial-scale one. It is essential that the Development Plan policies be more specific so that planning decisions rely on clear and precise objectives and principles that make it very obvious whether such developments are acceptable or not, not only in economic terms (which appears to be the 'norm') but also in addressing the many potential concerns associated with wind farm development, particularly those related to:

- a. health effects, including noise
- b. visual pollution and rural amenity
- c. damage to the environment and species habitat
- d. damage to wildlife
- e. fire risk
- f. dismantling facility upon termination

Council is not in a position to quantify these types of concerns nor has it the resources to conduct its own research on which to base a firm opinion as to the perceived impacts arising from wind farm developments. But, it accepts that there is a need for a stronger planning focus in the Development Plan to achieve a better balance between economic benefit and the environmental and social consequences.

For instance, further investigation should be done to at least identify 'no-go' locations, such as high amenity landscape areas, landscapes potentially at risk, high fire risk and heavily vegetated areas, key natural habitat areas and the like, where wind turbines should not be allowed to develop at all. In other locations, separation distances between wind turbines and public roads and nearby sensitive land uses, eg housing, public buildings and urban areas, should be described to help 'buffer' and minimise impact. More explicit policy direction also needs to be provided that puts greater weight or definition on noise/flickering/vibration impacts and monitoring, and in describing locational criteria that more clearly address proximity to ridgelines,

native vegetation, fauna, fire hazard, heritage assets and the like. These are the sort of changes or improvements that Council would advocate in any review commissioned by the Minister to reassess the 'soundness' of the present Ministerial Development Plan policies for wind farms.

And it is not only the wind turbines themselves that may present a concern, in that the associated infrastructure that service them, such as sub-stations, transmission lines and poles (frequently placed overhead), wind monitoring masts and the like, have an impact as well which, to Council's mind, has not been that well documented. The reality of these components tends to compound the issue with wind farms generally as their effects may be experienced far wider than just the operation or existence of the turbines. Sometimes, these allied developments are not put forward at the time of the application for the wind turbines themselves but come after an approval is given. A Council is then locked-in to looking at subsequent applications for these in a favorable way in light of the prior approval, ie it would appear illogical to approve the wind farm but oppose the ancillary infrastructure to make it all work. It is preferable that applications for wind farms incorporate up-front all of the components that will be required to power the wind farm development so that the total potential impacts of the development in its entirety can be assessed as one rather than piece-meal. Council has attempted to get this information in past applications as part of the assessment process but the operators seem loathe to provide details regarding the ancillary infrastructure in part, Council believes, because they have not advanced that far in their planning or that they could not be bothered to use up resources to do the work at the initial wind turbine stage. They seem to be saying to the Council, trust us, just look at the wind turbines now, the rest will follow and all will be well! Council is of the view that this approach means subsequent assessment frequently occurs after the event and is too late to be meaningful.

Having said that, Council does acknowledge that wind farm location is driven largely by 'external' factors and not just by zoning policy. Terrain characteristics, access to suitable wind patterns, proximity to the electricity grid and inter-connector capacity all constrain the options available to operators as to where best to position such developments. There are also positive economic benefits to the wider community and to individual farmers/landowners in having wind farms established in the district. Particularly during the construction phase, there are short-term employment opportunities as well as an increase in economic activity in the towns as a result of workforce expenditure on local services and goods. Likewise, farmers and landowners gain financially by accommodating turbines on their property, which supplements farm income but is unlikely to become a sustainable long-term substitute for the farm business.

Nonetheless, the 'market sell' about wind farms has always been about renewable energy and quotas and how important this is to a greener future and the consequent 'profit' to the community and the economy as a whole. The positives are emphasised, the potential negatives tend to be downplayed or neglected. What does seem to be missing in much of the argument is a consideration of the smaller-scale localised effects which may be a consequence of the actual intrinsic operation of a turbine itself or a wider issue related to negative amenity/landscape change. It is timely that a comprehensive re-evaluation of the impacts of wind farm developments is undertaken so that the industry and the community will have greater confidence in and acceptance of location and operational parameters.

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