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10 December 2010

Russell Guest
Manager Strategic Planning and Economic Development
Moyne Shire Council
PO Box 51
Port Fairy 3284
By email: moyne@moyne.vic.gov.au

Dear Russell,

CEC Response to draft Moyne Shire Council Major Energy Proposals and their Ancillary Infrastructure Policy

The Clean Energy Council (CEC) is the peak body representing Australia's clean energy and energy efficiency industries. Its priorities are to:

- create the optimal conditions in Australia to stimulate investment in the development and deployment of world's best clean energy technologies;
- develop effective legislation and regulation to reduce energy demand and improve its efficient use; and
- work to reduce costs and remove all other barriers to accessing clean energy.

The CEC advocates the development of policies on behalf of its members at federal and state government levels and promotes understanding of the industry and its potential through channels such as industry events, forums, conferences, newsletters and publications. The clean energy industry includes generation of electricity using wind, hydro, solar, biomass, geothermal and ocean energy as well as the emerging technologies and service providers in the energy efficiency sector, which includes solar hot water and cogeneration.

In response to the Moyne Shire Council's Major Energy Proposals and their Ancillary Infrastructure draft policy, the CEC would like to make the following comments.

The Clean Energy Council supports effective planning policies being implemented which continue to support the deployment of renewable energy projects and the attraction of clean energy investment and creation of jobs in areas where they are needed.

The CEC welcomes an approach to streamline planning approval processes, where they address legitimate community concerns and support the deployment of renewable energy projects. Such process must not place an unnecessary burden on clean energy development.

Existing standards and guidelines currently used in Australia at a state and federal level for wind farm development are already among the most stringent in the world. Wind farms should not be required to meet higher standards than faced by other infrastructure developments such as coal mines, conventional power stations or major industrial operations.

Planning systems already in place provide the overarching framework to assess proposed actions and thus balance the benefits of a development with any impacts. Mandatory guidelines particularly with regard to Moyne Shire Council's proposed 2km set back from neighbouring boundaries are detrimental to the attraction of clean energy investment and the creation of clean energy jobs in the region.

A report by Carbon Market Economics (attached) found that even a 2km setback from neighbourhood dwellings would put between 50-70 per cent of proposed wind farms in Victoria in jeopardy. This in turn would jeopardize billions of investment dollars and hundreds of jobs. This effect would be even greater with a setback from property boundaries. Such an outcome is contrary to the renewable energy targets of the State and Federal Government and would send investment and jobs out of the region.

Mandatory setbacks are not based on any scientific standard or measure. A report by expert noise consultants Sonus (attached) found that there is no evidence that residents will suffer any direct health effects from living near operating wind farms. Once wind farms are built the rates of complaints are very low in Australia and New Zealand and if a noise can be heard, then annoyance can result for some people, regardless of the noise level or the standard or guideline that applies.

Each development should be addressed on a site by site basis to understand amenity impacts in terms of noise, visual impact, shadow flicker etc and to determine the acceptability of a particular project.

Blanket statements such "Council expects there to be a distinct visual separation between proposals" are not helpful in their guidance for wind farm developments. Turbines must be spaced based on complex optimisation processes, which not only allows for the most efficient harvest of the wind resource but also protects the turbines from turbulence effects and the like. They cannot be spaced simply on visually appealing or symmetrical patterns. For many projects the commercial viability of a wind farm relies on optimisation. Visual separation is not necessarily required to avoid significant visual impacts. The visual impact assessment for a project will provide the information needed to assess the acceptability of a particular design.

If you have any further questions please contact Felicity Sands via telephone on 03 9929 4100 or by email at felicity@cleanenergycouncil.org.au

Yours sincerely

<original signed>

Kane Thornton

Director of Strategy