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13 December 2011

Presiding Member
Development Policy Advisory Committee,
State wide Wind Farms DPA
c/-DPLG Roma Mitchell House,
Level 3, 136 North Terrace
Adelaide SA 5000
By email: dpc@sa.gov.au

Dear Sir/ Madam,

CEC Response to the Statewide Wind Farms Developmental Plan Amendment

The Clean Energy Council welcomes the opportunity to provide a response to Statewide Wind Farms Developmental Plan Amendment.

The Clean Energy Council is the peak body representing Australia's renewable energy and energy efficiency industries with around 590 members.

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 Clean Energy Council works with members and the government to identify and address the barriers to efficient industry development in the stationary energy and energy efficiency sector.

The Clean Energy Council supports effective policies being implemented which continue to support the deployment of renewable energy projects and the attraction of clean energy investment and creation of jobs throughout rural and regional South Australia. Wind power as the lowest cost form of large scale renewable energy is an integral part of the renewable energy mix required to meet South Australia's 33 per cent renewable energy target.

South Australia has a vast resource potential for wind energy and currently holds 53 per cent of the nation's installed wind capacity. The wind industry is of huge economic importance to the state, not only through the creation of jobs during the development, construction and ongoing operation of the wind farm but also throughout the supply chain including the

manufacturers and suppliers of products and services to the industry. Over \$2.8 billion has been invested into the state's wind power sector so far, generating over 800 direct jobs and over 2400 indirect jobs. An environment that provides sufficient certainty is required to underpin investment in the generation capacity that will be required to meet the changing needs of the South Australian residential and business population. Consistent and effective regulatory and planning policy is required to shore up the continuing success of the industry in South Australia and to ensure the state's renewable energy target is met at the lowest possible cost. These positive reforms provide South Australia with a competitive advantage over other states such as Victoria who have introduced prohibitive planning policies which could cost Victoria billions in lost investment and the loss of hundreds of new regional jobs in the wind industry.

South Australia's planning system does enjoy a reputation for fairness, transparency and efficiency. It is imperative that the proposed Ministerial Development Plan Amendment maintains this by ensuring the amendments do not place an additional burden on the development of wind farms by creating delays or uncertainties in the planning system. The proposed reforms to the availability of third party appeal rights for Category 2 status developments are crucial to provide clarity and certainty to investors, wind proponents, local councils and the community and to prevent unnecessary and costly delays resulting from drawn out legal appeals. As indicated in the Developmental Plan Amendment analysis, there have been several examples where wind farm objectors have resorted to court action in response to granting of approval by some local councils resulting in major delays to the development even if the court action and subsequent appeals were dismissed. Delays and uncertainties such as these only act to create additional risk in conducting business in the state in turn making wind energy deployment more expensive.

The Clean Energy Council would like to make one further amendment to the proposed reforms. The Clean Energy Council considers that the Category 2 planning status should be assigned to all turbines located 2 or more kilometres from the boundary of 'town zoning'. The current draft proposal stipulates that turbines located 2 or more kilometres from a 'rural living zone' are Category 2, however wind proponents have found that there are a few historic zoning boundaries that are not reflective of current populations or the future growth of some rural towns.

The many Clean Energy Council members with wind energy interests support the South Australian Government's policy framework designed to reinforce and restore the role of local councils in wind farm development assessment; provide communities and investors with greater certainty and confidence; and improve the quality of information flows between communities, developers, councils and the government. To ensure these objectives are upheld and the planning process is streamlined, local councils must be adequately funded to enable them to effectively and efficiently assess renewable energy proposals in a timely manner.

The Clean Energy Council considers the wind farm reforms announced by the South Australian Government strike an appropriate balance between supporting clean energy and giving communities a voice in the planning process. The wind industry accepts the need for effective standards for wind projects and the need to engage and communicate with communities during the whole process of wind farm development and construction. To this end, the Clean Energy Council and its members have committed to develop a range of community engagement tools. These are planned to be completed in 2012 and include:

- Updating of the existing technical guidelines for wind farm development
- Development of comprehensive best practice guidelines for community engagement
- Development of a community expectations handbook outlining the wind development process
- Comprehensive research into community attitudes to wind development to help the industry better understand the key concerns and drivers of these concerns in communities.

As indicated in the Developmental Plan Amendment, wind farms do need to be sited in areas of good wind resource and close to the grid. Wind energy proponents already apply rigorous processes to their developments to ensure they are appropriately managed and mitigate potential impacts on the environment or the amenity of local communities. Extensive and exhaustive assessments are undertaken by proponents prior to submitting a development application to determine whether a wind farm is feasible on a specific site and as to whether there are any potential environmental or social issues that will impact upon the viability of a proposal. In addition to this, proponents engage a range of stakeholders at early stages of feasibility to determine environmental, cultural or amenity impacts in addition to those identified in the formal environmental assessment process that need to be understood and managed as part of the development. These stakeholders include landowners; the local community; noise, landscape, visual, aviation, electromagnetic interference and heritage experts; CASA; Network Service Providers; electricity retailers; indigenous groups and other specific interest groups including groups advocating in relation to local fauna or flora.

Wind power will play a crucial role in South Australia meeting its renewable energy target and reducing carbon emissions. Only a balanced and effective planning framework that is appropriately supported and funded will provide the increased certainty needed by the wind industry to make the business investments in generation infrastructure required for economic growth.

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>

Russell Marsh

Director of Policy