The Planning Institute of Australia (PIA) is the peak body representing professionals involved in planning Australian cities, towns and regions. The Institute has around 4,500 members nationally and around 1,200 members in New South Wales. PIA NSW plays key roles in promoting and supporting the planning profession within NSW and advocating key planning and public policy issues. This submission has been prepared on behalf of PIA NSW by Members of the Institute.

Introduction

The NSW Division of the Planning Institute of Australia (PIA NSW) welcomes the opportunity to provide input to the Draft NSW Planning Guidelines on Wind Farms.

The Planning Institute of Australia’s National Position Statement on the ‘Support for the Use and Development of Renewable Energy’ (September 2009), supports planning initiatives which:

- Contribute to research and development efforts leading to improving the commercial feasibility of alternative and renewable energy production and sources for the purposes of electrical energy supply, transportation, housing materials and industrial production.
- Reduce Australia’s reliance on non-renewable and geopolitically uncertain fossil fuels.
- Provide legislative opportunities for the implementation of viable alternate energy production methods.
- Removes legislative barriers to the implementation of viable alternate energy production methods.

The Planning Institute of Australia supports greenhouse abatement strategies, energy efficient built environments and other strategies to reduce vulnerability to climate change. The Planning Institute of Australia supports, in general, the development of wind farms as part of the solution to Australia’s energy requirements, but acknowledges there are valid concerns about their development.

The Planning Institute made a submission to the General Purpose Standing Committee No 5 Inquiry into Rural Wind Farms in August 2009. That submission outlines our general position on land use planning issues relating to wind farms and at that time we called for a state wide code or guidelines. The Institute commends the government for working towards the

Members of PIA NSW attended the Department of Planning & Infrastructure’s briefing on the Draft NSW Wind Farm Planning Guidelines at the Department’s offices on Wednesday 8th February 2012. The following comments are submitted to the Department in relation to both the Draft Guidelines now on exhibition and also the issues raised at the briefing session.

**General Comments**

The location of wind farms often draws the attention of the local community and raises a lot of community concern, mostly associated with the potential noise but also including the amenity and landscape impact. PIA NSW is therefore pleased to see the proposed introduction of State wide guidelines that are intended to achieve the following:

- Provide a clear and consistent regulatory framework for the assessment and determination of wind farm proposals across the state.
- Outline clear processes for community consultation on wind farm developments.
- Provide guidance on how to measure and assess potential environmental noise impacts from wind farms.

PIA NSW supports guidelines that should at a minimum address the following:

1. General principles for development of wind farms
2. Planning and environmental assessment processes and how these are linked
3. Standard definitions and terminology
4. Principles for location
5. Critical issues for assessment, such as (but not limited to)
   - Noise
   - Landscape values; and how landscape and visual impacts can be managed
   - Fauna and flora during construction
   - Birds during construction and during the operation phase
   - Distance to the nearest house
   - Height of the turbine and impact on flight paths
   - Community concerns around impacts
6. Clear and open consultation processes:
   - There should be detailed community consultation when the proposal is being designed, during the assessment phase, after the wind farm has been approved and during the construction phase.
7. Best practice guidelines that can be regularly updated drawing on existing international and Australian policy and practice in the area.
8. Regional Planning Strategies for NSW should incorporate planning for renewable energy developments. This is important given the likely proliferation of renewable energy developments in the future.
Specific Comments

1. PIA believes that the planning process should be fair and transparent. In this regard, there appears to be no reason (refer page 1 of draft Guidelines) for why wind farms classed as State Significant Development (SSD) are subject to public exhibition for minimum 60 days when all other SSD projects are only subject to 30 days. Further clarity and transparency around this requirement should be provided.

2. The requirement for written consent from landowners with existing residences within a 2km radius of a proposed wind farm (refer page 2 draft Guidelines) is supported. However, it is submitted that the written agreement should be provided in the form of a standard pre-prepared contract template that will avoid the execution of poorly written agreements that may at a later stage, potentially disadvantage land owners.

3. Further clarity should be provided regarding the need for photomontages (refer page 2 draft Guidelines) at each non host residence. Is this for all residents or just those who do not give consent?

4. The draft Guidelines propose the creation of Community Consultation Committees (refer page 4 draft Guidelines and the Appendices). The draft Guidelines indicate that one of the members of the committee should be a representative of the local council. The Institute considers that the Council representative should be the Council’s Director of Planning (or equivalent), rather than an elected representative of the Council.

5. There is a requirement for photomontages to be provided for affected residences including approved subdivisions (refer page 4 draft Guidelines). However, there is potential for this to misrepresent actual impacts as when dwellings are yet to be built there are a number of variables that cannot be foreseen including orientation of the house, fencing and landscaping.

6. Further information should be provided on the audit criteria for neighbours requesting from the Director General, independent noise monitoring at their house (refer page 7 draft Guidelines). Are there any criteria that the neighbours need to follow to submit such a request for example, can noise monitoring be requested at any time?

7. PIA also submits that there is a need for a public statement within the Guidelines from the NSW Health to present and clarify information on health issues related to wind farm developments. Heath issues are raised on page 7 of the draft Guidelines, but no detailed criteria for identifying and assessing health issues is provided. Given that health impacts are one of the most widely discussed and sensitive topics within the community, it is important to provide clear guidance to proponents and the community on the assessment methodology and approach to be followed. Currently, the guidelines ask for a ‘precautionary approach’ and to ‘explicitly consider health issues’ (refer draft Guidelines page 7), but provide nothing specific in terms of assessment procedures.

The Institute welcomes ongoing engagement on this issue.

PIA NSW Division
14th March 2012