

National Trust of South Australia

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Friday 20th February 2009

Essential Services Commission of South Australia
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To Whom It May Concern,

Re: Comment on a Proposal Paper “Wind Generation Licensing; Draft Proposals” December 2008

Introduction and Background

The National Trust movement in Australia is committed to the identification and protection of significant landscapes and has a long association with landscape assessment with many of the State Trusts having placed significant landscapes on their respective registers and having worked hard to protect both the natural and cultural heritage values of landscapes.

In the face of the quickening pace of wind farm development in the recent past, particularly in South Australia, the Canberra-based Australian Council of National Trusts opened up a dialogue with the Australian Wind Energy Association (Auswind) some 4 to 5 years ago with the objective of seeing if it would be possible, with industry and the National Trust working together, to develop a set of national guidelines for the assessment of landscape values and to determine the potential impacts on landscape values of wind farm development.

The Commonwealth Government was attracted to the idea of this objective and over a period of three years, the two organisations jointly received funding of \$500,000 to facilitate for the development of a *Wind Farms and Landscape Values; National Assessment Framework*.

In November last year the National Environment and Heritage Council’s report revealed that NSW, Victoria and W.A. were using the *National Assessment Framework* as part of the processes to be followed to obtain the necessary approvals for a wind farm development.

Unfortunately, to date this has not happened here in South Australia and so in November last year the NTSA convened a seminar for state and local government planning staff, wind industry companies, NTSA members and the wider community to promote the use of the *Framework*. Sarah Jones from Auswind, now the Clean

Energy Council, who was our key speaker at this seminar, was a seminal person in the development of the *Framework*.

We have, in-hand a copy of a Submission forwarded to us on this subject dated August 8th, 2005 titled “Submission to the ECOSA Wind Farms Licensing – Draft Statement of Principles.”

Comments on the Proposals

The National Trust of South Australia (NTSA) is not able to make any constructive comment on the technical and operational aspects of ECOSA’s Proposed Licensing Principles 1-6.

However, we do strongly support Proposed Licensing Principle 7: Sunset Clause. We believe that this will assist the ESCOSA/ the “regulator” and other planning authorities to rationalise the many applications that have been made over the past three or more years.

In addition it will ensure that wind farm proponents and developers are up to date with evolving current best practice in terms of our concerns with landscape assessment, community consultation (the *National Assessment Framework* referred to above), changes in local planning policies and procedures and if they are sincere in their applications. It would help to winnow out any opportunistic applications that have been or may be lodged, waiting for changes in State or Federal economic policy and national or global circumstances.

This is particularly relevant to the Myponga/ Sellicks Hill proposal, which was lodged many years ago while in the interim many of the parameters have changed; technologically and particularly the policy and planning aspects, as exemplified by the development and use by other states of the *Wind Farms and Landscape Values; National Assessment Framework*.

We thank you for this opportunity to provide comment and are willing to discuss any aspect of our submission and the *National Assessment Framework* should you wish to do so. A signed hard copy on National Trust of SA letterhead of this submission will be posted next week.

Yours sincerely,

Carlsa Carter
Chair, Natural Heritage Advisory Committee

Glenn Williams
Natural Heritage Manager