

Submission	Applicant comment	Officer Recommendation
<b>Agency submissions</b>		
<p>Submission 1</p> <p>Department of Planning Lands and Heritage - Aboriginal Heritage Conservation</p>	<p>Noted</p> <p>Thank you for letter dated 25 October 2024 seeking comment on the Draft Local Planning Policy Number 2 (Policy) - Wind Farms. I understand under the Shire of Cranbrook's Town Planning Scheme No. 4 planning approval is required for any proposed wind farm or renewable energy facility; therefore, the Policy has been developed as a guide for applicants.</p> <p>The <i>Aboriginal Heritage Act 1972</i> (AHA) manages Aboriginal heritage in Western Australia. Approvals under the AHA are required where there is potential for any harm to an Aboriginal site. Before undertaking any activities, applicants can undertake a search using the Aboriginal Cultural Heritage Inquiry System (ACHIS). As the AHA protects Aboriginal sites whether they are registered or not, applicants will need to be aware of their obligations under the AHA - Aboriginal Heritage Approvals.</p> <p>Consultation is essential to understand the importance and significance to Aboriginal people of any Aboriginal sites and obtaining their views on the likelihood and extent of harm by the proposed land use. Applicants are encouraged to contact the Department if they have any further questions regarding the AHA and may submit an enquiry via the ACHknowledge portal at Home - ACHknowledge Portal (<a href="http://dplh.wa.gov.au">dplh.wa.gov.au</a>).</p>	<p>That the submission be noted, however no modifications be made to the Policy.</p> <p>Any wind farm application would be advertised for public comment, and be referred to the DPLH for advice on Aboriginal Heritage Conservation as part of the normal planning process.</p>
<p>Submission 2</p> <p>Department of Health</p>	<p>Noted.</p> <p>The DoH has no objection to the content of the draft policy.</p> <p>You may consider the inclusion of the following references:</p> <ul style="list-style-type: none"> <li>• 2018 <i>enHealth</i> publication 'The health effects of environmental noise'</li> </ul>	<p>That the submission be noted, and a modification be made to the Policy to include a note that the Australian Government National Health and Medical Research Council concluded that there is currently no consistent evidence that wind farms cause adverse health effects in humans.</p>

	<p><a href="https://www.health.gov.au/sites/default/files/documents/2020/02/enhealth-guidance-the-health-effects-of-environmental-noise.pdf">https://www.health.gov.au/sites/default/files/documents/2020/02/enhealth-guidance-the-health-effects-of-environmental-noise.pdf</a>.</p> <p>The health effects of environmental noise</p> <ul style="list-style-type: none"> <li>• NHMRC Statement: 'Evidence on Wind Farms and Human Health'</li> </ul>	
<p>Submission 3</p> <p>Department of Primary Industries and Regional Development</p>	<p>Noted.</p> <p><b>Water erosion</b>  DPIRD is aware of wind farms where soils/landscapes, which would normally be considered low risk of water erosion, have suffered serious erosion. Very large and heavy machinery movement combined with access roads, pads for turbines and other features can concentrate water flow resulting in erosion. The earlier remedial works are undertaken on disturbed areas, deemed to be at risk of compaction or erosion, the lower the risk of land degradation occurring.</p> <p>DPIRD suggests 'Section 8 – Environmental Impact' should include the development of a Surface Water Management Plan, incorporating appropriate design methods to manage water erosion from intense summer or winter rainfall events.</p> <p><b>Biosecurity</b>  It is important to manage the biosecurity risks associated with the construction and ongoing operations of a wind farm. This will minimise the biosecurity risk for the landholder as well as for adjoining farms and along transport routes.</p> <p>DPIRD suggests 'Section 12 – Other Potential Impacts' should include the development of a Biosecurity Management Plan to ensure all excavation equipment/drilling rigs, and the likes are cleaned and free from any soil/plant material prior to leaving paddocks and especially moving from property to property. DPIRD can assist with the preparation of this plan.</p>	<p>That the submission be noted, and a modification be made to the Policy to include:</p> <ul style="list-style-type: none"> <li>- Requirement for a Surface Water Management Plan;</li> <li>- Reference to biosecurity;</li> <li>- Reference to pads being covered to a 'normal deep ripping depth'.</li> </ul>

	<p><b>Decommissioning and Rehabilitation Plan</b></p> <p>A wind farm is expected to have an operational life of approximately 20 to 30 years. At the end of this period, DPIRD expects the facilities would either be upgraded to extend the wind farm’s operational lifespan or be decommissioned, restoring the area to its previous land use.</p> <p>When decommissioned, the options for the concrete foundations of turbines (and other underground infrastructure) include being retained and covered with soil or cut down and covered with soil, both options will impact seeding depth and crop/pasture root growth potential. DPIRD suggests that decommissioning is planned to “normal deep ripping depth” to ensure sufficient depth for breaking up of compacted soil layers in the future.</p>	
<p>Submission 4</p> <p>Department of Biodiversity, Conservation and Attractions</p>	<p><b>8. ENVIRONMENTAL IMPACT</b></p> <p>Consistent with the WAPC Position Statement on Renewable Energy Facilities, this Policy requires applications to address, avoid and minimise impacts of any wind farm on the natural landscape, and environment (including flora/ fauna).</p> <p>Applications should be accompanied by an environmental survey of the site by a suitable qualified environmental consultant and address:</p> <ul style="list-style-type: none"> <li>i. The type, location and significance of flora and fauna;</li> <li>ii. <del>Any rare or endangered species or ecological community listed as Priority or Threatened under the Biodiversity Conservation Act 2016 or matters of national environmental significance listed under the Environment Protection and Biodiversity Conservation Act 1999.</del></li> <li>iii. Stopover sites, local bird species, roosting or nesting sites for birds of conservation significance;</li> <li>iv. Location of bat colonies;</li> <li>v. Areas of high raptor activity;</li> <li>vi. The cumulative impact of turbines on migration routes;</li> <li>vii. Existing remnant vegetation to be retained or that is proposed to be removed (on a plan);</li> <li>viii. Distances to areas of habitat, remnant vegetation and areas of natural environment on a context plan, including conservation areas, reserves or crown land;</li> </ul>	<p>That the submission be noted, and a modification be made to the Policy to include a modified Point 8(ii).</p> <p>Any wind farm application would be advertised for public comment, and be referred to DBCA for specific advice as part of the normal planning process.</p>

	<p>ix. Maximising distances to bird conservation areas, breeding grounds of sensitive species and areas of remnant bushland that is likely high value bird habitat or habitat for birds of conservation significance;</p> <p>x. Methods to avoid bird collision such as increasing the visibility of rotor blades (where feasible), flashing lights, and keeping bird migration corridors free;</p> <p>Applications should also consider the impacts of compaction to subterranean fauna and Short-range endemic invertebrates as well as altered hydrological processes.</p> <p>Applications should take into account the potential for the introduction of weeds and diseases such as dieback.</p>	
<p>Submission 5 Water Corporation</p>	<p>The Proposed Local Planning Policy No.2 Wind Farms, does not affect Water Corporation assets, thus Water Corporation has no objection.</p> <p>Protection to Water Corporation Infrastructure should be noted in section <b>“13. TRAFFIC MANAGEMENT AND THE PROTECTION OF ROADS AND OTHER PUBLIC INFRASTRUCTURE”</b>.</p> <p>Any future works for the commissioning of these Wind Farms around Water Corporation Assets should be referred to Water Corporations Protection of Assets Department.</p>	<p>That the submission be noted, and a modification be made to the Policy to include a statement about Water Corporation assets under Point 13.</p>
<p>Submission 6 Main Roads GS</p>	<p>Reference may be made to the provision of service reports detailing impacts to existing/planned services in road corridors:</p> <ul style="list-style-type: none"> <li>• Power Network Upgrades or New Works to distribute power generated from renewable sources accessing/crossing road corridors.</li> <li>• Temporary upgrades to the road network or relocation of above ground infrastructure to facilitate transport of large items, and new or upgraded driveway/crossover access to the State Road Network will require a design review and application process.</li> </ul>	<p>That the submission be noted, however no modifications be made to the Policy.</p> <p>Any wind farm application would be advertised for public comment, and be referred to Main Roads GS for specific advice as part of the normal planning process.</p>

	<ul style="list-style-type: none"> <li>No works can occur within a State Road Reserve without Main Roads authorisation.</li> </ul> <p>Reference may be made to the WAPC Transport Assessment Guidelines, and the subsequent Traffic Impact Assessment should consider:</p> <ul style="list-style-type: none"> <li>Operation and Maintenance Agreements to access the State Road Network.</li> <li>Route Assessments for the transport of dangerous goods on the State Road Network.</li> <li>Provision for a Transport Management Plan and an Application for a permit that authorises the movement of Oversize loads shall be submitted for approval to the satisfaction of Heavy Vehicle Services – Main Roads WA.</li> </ul>	Any Traffic report would already need to consider current WAPC Transport Assessment Guidelines.
Submission 7 Department of Education	<p>The Department supports the Policy’s objectives to recognise the need for protecting sensitive land uses against potential impact that wind farms may cause. Wind farms, by their appearance and operational nature, are generally visually imposing and may generate a range of emissions which may at times exceed amenity levels considered acceptable in sensitive land uses. As schools are deemed sensitive land uses, it is imperative to ensure that school sites are located amongst or adjacent to compatible land uses to support education, health, safety and wellbeing outcomes of students.</p> <p>In this regard, the Department supports the Policy’s consideration for land use compatibility by factoring in the location, noise and appearance of wind farms and the impact they may have on surrounding properties. In addition, the Policy’s requirement for proponents to undertake early engagement with the community and stakeholders is certainly welcomed.</p>	That the submission be noted, however no modifications be made to the Policy.
Submission 8 DFES	Following a review of the draft policy, it does not appear that bushfire has been included as part of the consideration of the document.	That the submission be noted, however no modifications be made to the Policy.

	<p>DFES can provide advice on renewable energy facilities in bushfire prone areas.</p> <p>Currently DFES assesses these proposals against the CFA Design Guidelines and Model Requirements - Renewable Energy Facilities (REF) v4 (August 2023) which is considered best practice for the assessment of renewable energy facilities. DFES is currently drafting a local guideline for WA which would provide similar advice. Given the policy framework, DFES usually only provides advice on facilities located in bushfire prone areas, however the renewable energy facilities guidelines are expected to provide standard considerations and measures for fire safety, risk and emergency management in designing, constructing and operating new renewable energy facilities, and upgrading existing facilities.</p> <p>In the interim (until DFES has finalised its renewable energy facilities guidelines) the Shire may wish to consider addressing the key elements of CFA Design Guidelines and Model Requirements - Renewable Energy Facilities in the proposed Wind Farms local planning policy.</p> <p><a href="https://www.cfa.vic.gov.au/plan-prepare/building-planning-regulations/renewable-energy-fire-safety">https://www.cfa.vic.gov.au/plan-prepare/building-planning-regulations/renewable-energy-fire-safety</a></p>	<p>The current WAPC Bushfire Guidelines generally only apply where there is development in a bushfire prone area, and exemptions can be applied where there is not a significant permanent workforce on site.</p> <p>There is already a requirement for bushfire to be addressed under the deemed provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</p>
<p>Submission 9 DWER</p>	<p>The Department supports consistent and appropriately considered development, and provides the following comments:</p> <ul style="list-style-type: none"> <li>• It is noted that the draft policy does not directly consider water resources, in terms of either supply or protection. Water supply is essential to the construction stage and may still be required during the operation stage (dust suppression, firefighting etc) for all windfarms. We recommend that the Shire refer to Draft State Planning Policy 2.9 – Planning for Water Draft SPP 2.9 Planning for water policy (dSPP 2.9), and associated Planning for Water Guidelines Draft State Planning Policy 2.9 - Planning for Water Guidelines (Water Guidelines). The Shire should ensure that the draft policy is consistent with the outcomes and measures of the Draft SPP 2.9, particularly as it relates to Infrastructure.</li> </ul>	<p>That the submission be noted, and a modification be made to the Policy to:</p> <ul style="list-style-type: none"> <li>- reference addressing protection of water supply, waterways and wetlands;</li> <li>- Clarify that the highest noise levels/buffers are to be within the development lot(s).</li> </ul> <p>In regard to comments on State Planning Policy 2.9. it is not necessary for the Local Planning Policy to list all relevant State Planning Policies. It is</p>

	<ul style="list-style-type: none"> <li>○ It is recommended to insert a consideration for water supply during the development stage, especially for construction. Many proposals are for remote areas where water supplies are limited, and surface nor groundwater are proclaimed under the Rights in Water and Irrigation Act. This will align with local planning policy objective 'To conserve use of local resources such as gravel, water and sand.'</li> <li>○ It is recommended that protection be addressed through the identification and application of adequate buffers to waterways and groundwater and the inclusion of a Water Management Plan including stormwater management. This should be relevant to all phases of the proposal.</li> <li>○ It is recommended that Section 8 - Environmental Impact, include a requirement for applications to specifically address water supply and protection, and identify relevant waterways, wetlands, sensitive water resource areas, groundwater, and groundwater dependent ecosystems (GDE).</li> <li>○ Specific consideration should be given to relevant legislation. It is recommended that Draft SPP2.9 and Water Guidelines are referred to in relation to the types of water resource and protection considerations and relevant legislation which may apply.</li> <li>● It is noted that the draft policy does not consider fire. Fire poses a risk to the environment, water and infrastructure during all phases of a wind farm proposal. It is recommended that the draft policy incorporates a requirement for proposals to include a Bushfire Management Plan. The Bushfire Management Plan must consider water and its availability for firefighting.</li> <li>● While flora and native vegetation are referred to under Section 8 - Environmental Impact, it is recommended that emphasis is placed on the need to avoid or minimising clearing. Minimising the environmental footprint and the use of existing infrastructure (where appropriate) is to be encouraged.</li> <li>● Impacts from such proposals can occur during all phases, including the construction and operational period. During construction, impacts can occur over a much larger spatial area. It is</li> </ul>	<p>already a requirement for Council to have due regard for any state planning policy under the deemed provisions of the <i>Planning and Development (Local Planning Schemes) Regulations 2015</i>.</p>
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	<p>recommended that the Shire include a statement that proponents must consider the environmental impacts through all phases of the project, covering both the construction and operational stages.</p> <ul style="list-style-type: none"> <li>• It is recommended that the Shire consult directly with the Department of Biodiversity, Conservation and Attractions, and the Department of Fire and Emergency Services, for expert input into the draft policy.</li> </ul> <p>Attached is a report provided by our Environmental Noise Branch, which provides more specific recommendations regarding noise – refer <b>Attachment 2</b>.</p> <p>In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.</p>	
<p>Submission 10 Western Power</p>	<p>Thank you for your submission to Western Power for Ref: Draft LLP No. 2 Wind Farms</p> <p>Unfortunately requests for general comments, feedback and approval for proposals can't be provided for without a formal application and the investigation by Western Power that follows.</p> <p>We suggest:</p> <ul style="list-style-type: none"> <li>• Reviewing your query against the processes referred to in our <a href="#">Strategic Planning</a> web page</li> <li>• Using our provided mapping tools and <a href="#">Before You Dig Australia</a> to locate any assets that may be affected by any proposed change or development,</li> <li>• If there are transmission assets (66,000VOLTS-330,000 VOLTS) in proximity to your work, applying via our <a href="#">move or remove transmission and communication assets</a> form,</li> <li>• Ensuring any developers involved are aware that they will need to make an application to deal with any assets that are in the</li> </ul>	<p>That the submission be noted, however no modifications be made to the Policy.</p>

	<p>development area as well as for the power requirements for the development.</p> <p><b>Submission of a proposed road closure:</b> Where our assets are present, continued physical access for maintenance and emergency response must be provided. If this is not via the original road path, changed access conditions should be communicated via our <a href="#">Land Entry Preferences form</a>.</p>	
<b>Community submissions</b>		
<p>Submission 11 Phil Horrocks</p>	<p>Proposed Wind Towers of 200 metres or less height should not be closer than 2 kilometres from residential buildings. Plus wind towers higher than 200 metres need to be further again from residential buildings.</p> <p>Wind Towers need to be at least 500 metres from a boundary fence unless the neighbouring property is also hosting Wind Towers.</p> <p>Road maintenance and gravel supplies need to be address between the Wind Farm proponents and the Shire before development takes place.</p>	<p>That the submission be noted, however no modifications be made to the Policy.</p> <p>Whilst it is appreciated that specific setbacks to dwellings and lot boundaries are desired, the Policy requirement for noise buffers to be contained within the development lot boundaries provides a sound basis to ensure that developments are 'self contained' and that noise will not impact on future development of dwellings on nearby lots.</p>
<p>Submission 12 Pindicup Grazing</p>	<p>We write as a local agricultural business and ratepayer of properties in the vicinity of Lake Muir, west of Frankland River.</p> <p>In planning policies, we want our area broadly excised from any future wind farm zones.</p> <p>As the council is well-aware, we strongly support the reinstatement of agriculture and the growth of the agricultural economy in our local area. Due to our remoteness, we have never seen evidence of sustained</p>	<p>That the submission be noted, however no modifications be made to the Policy.</p> <p>It would be difficult to actively enforce a wind farm exclusion area through a Local Planning Policy. The Draft Policy already goes above and beyond the requirements outlined in the State</p>

	<p>government, environmental NGO or corporate commitment to our landscape, its wellbeing or proper maintenance. The farming people look after the land in ways that other sectors have never matched or achieved, despite investor funds and economic promises.</p> <p>Our stance on wind farms is similar to our perspective on plantations. We do not support fence to fence plantations, as we feel in the past this has caused damage to the landscape, community cohesion, the economy, the safety of local residents and their property and the environment. We believe stewardship of the land by committed local agricultural landholders is the best way to look after the unique local environment. Reinstating agricultural land use has been of inestimable benefit to the local environment and biodiversity.</p> <p>Our views in relation to windfarms are as follows: Our sub-region at the west of Cranbrook Shire cannot sustain any more ill-thought-out carbon-abatement, renewables or agri-environment schemes. Our local environment is known globally and to the United Nations as ‘significant to humanity’ and there can be no argument for placing wind turbines on bird migration paths.</p> <p>We also believe wind farm uses may act to inhibit local stewardship of land, by making it less liveable for residents. The farm properties near Lake Muir will always need committed care, weed eradication, feral animal destruction and fire control. Corporate and government land-uses on farms in the past left them very degraded: Accessed by illegal pig hunters, who dropped pigs and cages on farms managed by distant corporate entities; Soils being heavily sprayed by plantation users- leading to death of turtles, ground-based bird life and insects; Extreme fire risk created by highly flammable monocultural plantations. Amongst our greatest concern was the unfettered growth of noxious weeds right next to wetlands of international significance.</p> <p>The Shire of Cranbrook’s Windfarm Zone must completely excise a radius of land 20km from the centre of Lake Muir. Lake Muir and its associated</p>	<p>Planning Position Statement on Renewable Energy.</p> <p>The Policy (as amended and proposed) already references the need to specifically address water supply and protection, and identify relevant waterways, wetlands, sensitive water resource areas, groundwater, and groundwater dependent ecosystems.</p> <p>The Policy also requires a Context Plan with distances to conservation areas, and a requirement to maximise distances to bird conservation areas, breeding grounds of sensitive species and areas of remnant bushland that is likely high value bird habitat or habitat for birds of conservation significance.</p> <p>In addition, any application would be advertised for public comment and be referred to DWER.</p> <p>It is understood why some local community members would like to see an exclusion area implemented, however any arbitrary exclusion area through a Local Planning Policy is not likely to achieve that, especially as no buffers have been recommended by DWER.</p>
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	<p>catchment includes wetlands of international significance. (Note: Ours is a cross-border community, and we sit alongside other isolated properties -our neighbours- who are in the Manjimup Shire. We are proudly part of the Cranbrook shire, but our status as a cross-border community must be considered in all deliberations. While Lake Muir is in the Manjimup Shire, it is part of our geography and local landscape. Cranbrook Shire also includes part of the Lake Muir National Park, where the shire's boundary extends south of Muir Highway- this is your landscape too)</p> <p>Lake Muir is a UN listed wetland of international significance as part of the RAMSAR convention (1975).</p> <p>RAMSAR -listed wetlands are considered as being of significant value to 'humanity as a whole' There are only 12 RAMSAR listed wetlands in all of Western Australia. They have significant protections.</p> <p>Lake Muir is home to endangered bitterns; the Australasian bittern is listed as a species that is rare or likely to become extinct. Muir's Corella is an endangered species endemic to the area. They travel in an area from Boyup Brook, south to the vicinity of Lake Muir, crossing local farms in the area. A wind farm of any kind would interrupt the migration of this species. I note that widespread plantations are also considered a risk to this species (Muir's Corrella Recovery Plan, January 2009) due to the damage this land use does to nesting sites and availability of food.</p> <p>We are proposing an exclusion zone of 20km from the centre of Lake Muir, so that no farm in this vicinity can be used as a wind farm, due to the damage it would do to local birdlife. The trade off between renewable energy and biodiversity is too great in our area, so windfarms must be excluded.</p>	<p>The buffer widths recommended for any particular wetland are dependent upon the conservation significance of the wetland and the purpose of the buffer.</p> <p>Generally, buffers range between 20 metres to 2 kilometres, with the larger 2 kilometres being for the protection of groundwater.<sup>1</sup></p> <p>The WA Planning Commission has a Draft Guideline for determining wetland buffers (2005), however TPI is not aware of any specific planning instruments citing buffers between wind farms and wetlands.</p> <p><sup>1</sup> Reference: Water Notes January 2000 - <a href="#">WRCWN04.PDF</a></p>
<p>Submission 12</p> <p>Shannon Hardingham</p>	<p>Along with my neighbours I share the view that there should be no windfarm considered in a 20km radius from the centre of Lake Muir.</p>	<p>That the submission be noted, however no modifications be made to the Policy.</p>

	<p>There can be no benefit from renewable energy generation if it destroys the biodiversity values of a globally significant environment.</p> <p>As Lake Muir and its catchment (with areas of its catchment within Cranbrook shire boundaries) are the only place in the Cranbrook shire on a UN biodiversity listing (RAMSAR Convention 1975) - they must take first priority in being excised from a future windfarm zone.</p> <p>Please utilise the RAMSAR convention when preparing your policy- it provides scientifically-referenced evidence to exclude the farms around Lake Muir from windfarms.</p>	<p>Refer to comments on submission 11 above.</p>
<p>Submission 13 Janine Phillips</p>	<p>We are the owners/ratepayers of two properties in the Unicap area at the Western end of the Cranbrook Shire which we have farmed sustainably for over fifty years.</p> <p>Along with our neighbours, we are strongly of the view that our area should be clearly excluded from any future wind farm zones in the Cranbrook Shire. We support the idea that a 20km radius from the centre of Lake Muir should be excluded from wind farm development.</p> <p>Our natural environment is internationally recognised under the United Nation's RAMSAR convention (Wetlands of World Significance). International scientists converge on our area to record and study unique species and the health of the wetlands that support them.</p> <p>Our lake systems are of significant environmental value and of value to the Cranbrook Shire for tourism and visitation by the International Scientific Community. This is why the community has been so focused on restoring community infrastructure.</p> <p>We believe wind farms will affect the environmental outcomes as well as the visual amenity and liveability of the area. We need to take all steps to maintain a viable population in our isolated, remote region to keep the</p>	<p>That the submission be noted, however no modifications be made to the Policy.</p> <p>Refer to comments on submission 11.</p>

	agricultural economy strong and to be able to protect our precious natural environment.	
Submission 14  Jan Pope	<p>We have read the Shire's Draft Policy and wish to commend Shire Management and Councillors for the work done to present this Draft Policy. With reference to the Objective <b><i>"To provide a clear position on wind farms for the assessment of development applications."</i></b>, as Ratepayers, we welcome and value the opportunity to have some input into this Policy relating to the establishment of Wind Farms within our Shire boundary</p> <p>While understanding the attraction of the expected income stream offered to landholders in times of uncertainty in sheep and wool returns, we should make it clear that we are opposed to the building of large-scale wind farms on prime agricultural land as a means of providing power for domestic, agricultural and industrial purposes.</p> <p>Our comments below are in order of their appearance in the Shire's Draft Policy:</p> <p><b>8. Environmental Impact</b> (i. to x) One aspect that might be considered under this heading, is the impact of the various types of foundations used to support the weight of the turbines in different soil types and topography, ie. shallow foundations, deep foundations or piled foundations. As the Shire of Cranbrook is responsible for ensuring building plans comply with the operative Town Planning Scheme, the Shire's Policies and the Building Code of Australia, will proponents be required to provide engineering details of the foundation and dimensions of these structures in their planning applications for the construction of wind turbines?</p> <p><b>9. Visual and Landscape Impact</b> (i. – vi. &amp; i. – v.)</p> <ul style="list-style-type: none"> <li>We note all comments in this Section.</li> </ul> <p><b>10. Noise Impact and</b> <b>11. Land Use Compatibility and Noise Buffers</b></p>	<p>8. Structural details are not dealt with at the planning application stage, and detailed engineering goes into the construction of turbines.</p> <p>11. The WAPC Posiiton Statement on Renewable Energy Facilities already</p>

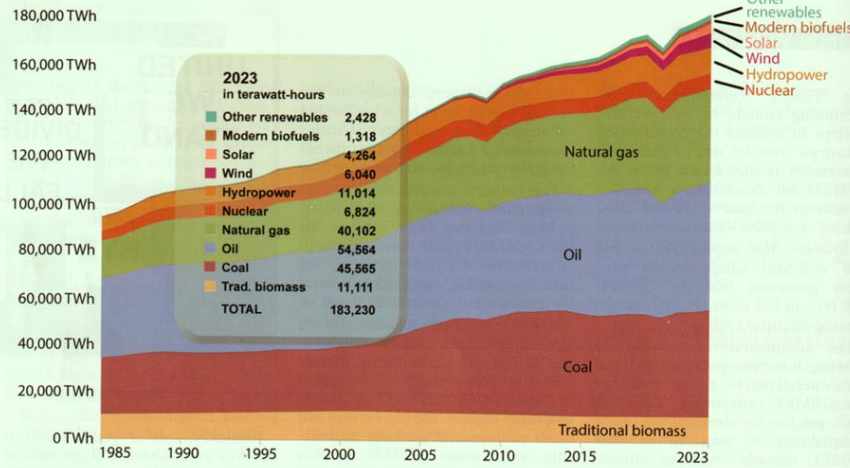
	<p>Noting the comments in these Sections in relation to the WA Noise Regulations – will there be a minimum distance for ‘noise buffers’ which protects current dwellings on a rural property from the noise impact of a wind turbine, whether the turbine is on the same property or on a neighbouring property?</p> <p>Research of various websites and documents show distances between 700m and 1500 metres between turbines and dwellings is necessary to prevent adverse health effects related to low-frequency noise including sleep deprivation and depression.</p> <p><b>12. Other Potential Impacts</b> We note all points in this Section.</p> <p><b>13. Traffic Management and the Protection of Roads and other Public Infrastructure</b> We note all points in this Section.</p> <p><b>14. Decommissioning Program</b> We note all points in this Section which reflect many of our concerns. With various evidence to show wind turbines have an economic lifespan of anywhere between 15 and 25 years, the question to be answered is “<i>Who will be responsible for the decommissioning, dismantling and clean-up?</i>” Demolition and removal is and will continue to be a specialist and expensive exercise with figures between \$400,000 and \$600,000 per turbine depending on the size of the structure.</p> <p>Regardless of whether the proponent gives a watertight guarantee that they as developers of a ‘wind farm’ will take responsibility for decommissioning, these are the ‘assets’ of businesses to be sold as a tradeable commodity and over the life of the project, agreements to fund the decommissioning of these so-called assets, would likely become unenforceable.</p> <p>Equally, there is the likelihood that actual structural failures of the turbines, or the collapse of the ‘green energy’ vision, may result in companies just walking away from their responsibilities, leaving landowners with the liabilities. Whatever the per annum ‘lease’ or</p>	<p>recommends a 1.500 metre minimum distance between turbines and sensitive premises. The Shires Local Planning Policy goes a step further by requiring that noise buffers be to lot boundaries, and contained within the development lots, rather than be measured to existing sensitive premises.</p> <p>14. Currently proponents are responsible for that decommissioning enforced as a condition of any development approval.</p>
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	<p>'license' is, it would take almost all of that income to be quarantined to pay for the dismantling and re-establishment of the land.</p> <p>In addition – we have the following concerns and comments:</p> <p><b>Questionable Cost-Effectiveness:</b></p> <ul style="list-style-type: none"> <li>• <b>High Subsidy Costs:</b> The financial costs of wind energy are often borne by taxpayers through subsidies and grants. These funds could be better allocated towards other forms of renewable energy that have less of an environmental and social impact.</li> <li>• <b>Intermittent Energy Supply:</b> Wind energy is intermittent and unreliable, meaning that it cannot be solely relied upon for energy production. This can lead to an increase in the use of backup fossil-fuel plants, which undermines the environmental benefits of wind energy.</li> <li>• <b>Net Zero:</b> Unlike baseload power, wind power produces very unstable power (voltage and frequency) output at source. Thus, as a standalone power source, it is totally unsuitable as a baseload power generator. In short, without smoothing out by mixing with stable baseload power (coal, hydro, nuclear), it is of zero practical value. <i>Dr. Brian Handley.</i> (Dr Handley is an experienced University lecturer, presenter, facilitator, consultant and trainer. He has presented at national and international conferences, and his research has been published in leading journals. Brian was the MBA Director of Curtin University's Graduate School of Business and is now an Adjunct Professor at the University of Notre Dame.)</li> <li>• <b>Solar:</b> In a report released on the 2<sup>nd</sup> December 2024, the Australian Energy Market Operator (AEMO) said “emergency backstop” powers were urgently needed to ensure solar installations could be turned down – or off – in extreme circumstances. The AEMO wants to switch off or throttle rooftop solar in every State to help cope with the daily flood of output from millions of solar systems. In South Australia for example, rooftop solar was periodically supplying more than 100 percent of the State's demand, with surpluses being exported to other states.</li> </ul>	<p><u>General.</u></p> <p>Noted.</p> <p>These seems be comments on broader state and federal government issues.</p> <p>Matters such as funding and reliability are beyond local government control.</p>
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	<p>What's more, AEMO said that "in the next few years", the share of demand being met by rooftop solar, for the entire system, could be as high as 90 percent at times. The money that is being poured into wind turbines should be used to research and develop more efficient and cost-effective batteries to store the excess power in the homes whose solar panels are producing it – allowing more families to be independent of 'the grid' in their suburban, regional and rural homes.</p> <p><b>Consultation and Transparency</b></p> <ul style="list-style-type: none"> <li>• <b>Public Consultation:</b> We appreciate the opportunity to make our comments and we believe that before proceeding with any such large-scale development, more extensive community engagement is necessary.</li> <li>• <b>Environmental Assessments:</b> There must be thorough and independent environmental impact assessments and reviews carried out to address the long-term consequences of any such project before any planning permission is granted.</li> <li>• <b>To source truly independent environmental impact assessments and reviews,</b> and have thorough and independent consultation with landholders and community, we believe should be provided by the Local Government Authority who represents landholders and community. Although this will be a cost borne by the Local Government Authority, its independence would be guaranteed.</li> <li>• <b>The proportion of wind-power in the energy supply</b> - The graphs overpage show the small proportion of wind as a producer of energy globally and in Australia, in relation to all other sources of energy. There is a vast gap to close for wind and other renewables to make up an ever-increasing demand for power.</li> </ul>	<ul style="list-style-type: none"> <li>- Any wind farm proposal would be advertised for public comment.</li> <li>- The Environmental Protection Authority (EPA) considers proposals and decides whether they require formal Environmental Impact Assessments.</li> <li>- Local Governments cannot override existing environmental legislation generally administered by the EPA, and does not have the resources to carry out independent environmental assessments and reviews.</li> </ul>
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## Global primary energy consumption by source

Primary energy is based on the substitution method and measured in terrawatt-hours



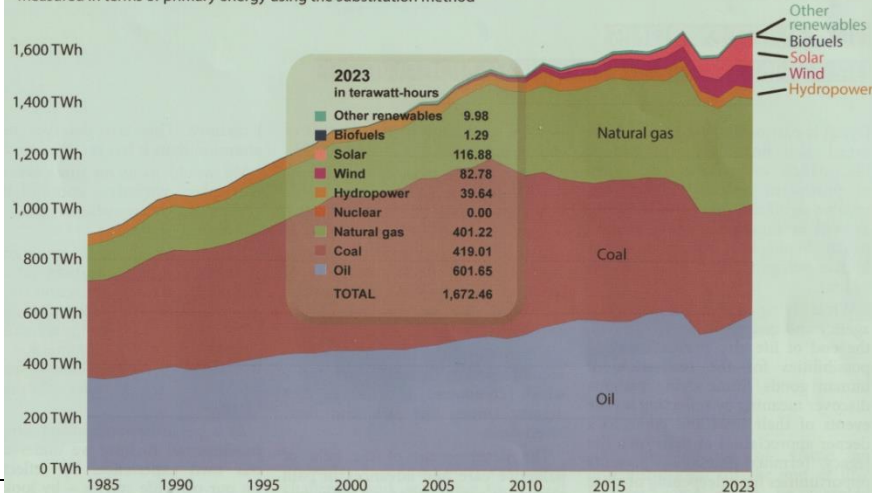
Data source: Energy Institute, Statistical Review of World Energy (2024); Smil (2017)

OurWorldInData.org/energy

Note: In the absence of more recent data, traditional biomass is assumed constant since 2015.

## Energy consumption by source, Australia

Measured in terms of primary energy using the substitution method



	<p><b>The establishment of large-scale wind turbines in the Shire of Cranbrook has the possibility to impact the</b></p> <ul style="list-style-type: none"> <li>• potential high risk of fire from the turbines and transmission lines in high wind and hot conditions</li> <li>• noise pollution generated by the turbines which can have significant effects on health</li> <li>• long-term environmental impacts on birdlife including migratory birds</li> <li>• loss of productivity in our agricultural industries</li> <li>• possible need and cost of refencing to fit internal roads to turbines</li> <li>• possible impact on stock handling</li> <li>• property values – studies have shown that nearby wind farms can decrease property values by as much as 20% which would negatively affect landholders whose investment would be reduced by the presence of industrial-scale wind turbines.</li> <li>• visual amenity – the large towering presence of wind turbines would significantly alter the landscape and detract from the natural beauty and integrity of our farming culture and heritage. We are a very diverse and safe agricultural area, experiencing dry seasons occasionally but not consistently over years, and we are a community of successful and resilient farming families. To have quality agricultural land blighted by wind turbines, more transmission lines and battery installations with no guarantee they will solve the power issue in the short or long term, could have negative outcomes for future generations.</li> </ul> <p>In conclusion, as a matter of interest, in a Report released mid-year 2024, is the finding that 49 percent of Australian EV owners have “<i>pulled the plug</i>” and were likely to switch back to a petrol or diesel-only internal combustion engine (ICE) for their next vehicle. (<i>RAC Horizon article – Summer 2025</i>).</p>	<p>Noted. The Local Planning Policy aims to try and ensure that some of these issues are considered as part of the planning process. Some, such as land values, are not planning considerations.</p> <p>Noted. The remainder of this submission are general comments.</p>
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	<p>Similarly, we do not need to find that the coercion to panic about recent climatic conditions and trends, compared to centuries of variable temperatures hotter and colder than we've experienced in this relatively short space of time, will have rushed us into 'renewables' technology including wind turbines, which will not provide the power needed to supply our domestic, agricultural and manufacturing needs in the short or long term.</p> <p>This is not the forum to engage in the 'climate change' debate, however there is the possibility that if the current trend towards large-scale windfarms and solar farms, plus prominent transmission infrastructure is imposed upon us as the only solution to an 'energy crisis', then we may be going in a direction we could regret. We may be doing our future generations a considerable disservice and leaving them with the burden of infrastructure which could become redundant and expensive to deal with.</p>	
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