

NOTE: Please redact my personal information and my signature, before making public.

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20 July 2025

Tasmanian Planning Commission
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Hobart, TAS 700

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RE: Representation - Cellars Hill Wind Farm Major Project

To All those it may concern:

"The Cellars Hill Wind Farm Major Project draft assessment criteria and draft guidelines for the assessment of Matters of National Environmental Significance" does not consider many issues that are of equal significance, at least, the nation, to Tasmania, or the environment.

Firstly, it is a gross over-estimation or exaggeration to suggest by its title the Cellars Hill Wind Farm has national environmental significance. Even if a second Marinus Link to Victoria is added to the equation, electricity generated would only benefit the southeastern part of Australia, possibly extending to Canberra and Sydney. But, this would come at substantial cost to Tasmania, contributing to the State's budget deficit, further environmental damage, especially to the foreshore and seabed, whilst doubtfully reducing the cost of electricity to power businesses and homes.

The only ones who would see any benefit would be farmers less interested in traditional farming and more interested in annual income of approximately \$45,000 per wind turbine per year extra income on top of farming, and around \$2,500 per hectare per year for solar panels. Why grow crops and graze cattle, when they can farm wind and sunshine? What has happened to the pride of farming so many acres of land their forefathers worked so hard to acquire and hang on to? Nothing matters more than a quick buck for no work, at the expense of the environment, at the expense of native flora and fauna, at the expense of vulnerable species, at the expense of the very scenic landscape that attracts tourism, at the expense of the identity of the Central Highlands' identity.

Worth considering, in Australia's and Tasmania's quest to prove to the world we are "clean and green", in practice, WE are polluting other parts of the world at an alarming rate, whilst making people sick and killing people who are desperately poor and have very little education to defend their interests or to do anything else but work in mines extracting minerals to be used in wind turbines, solar panels and storage batteries.

Here are some excerpts from an article (see references)-

"According to the US Department of Energy (DOE), about 12% of all silicon metal produced worldwide (also known as "metallurgical-grade silicon" or MGS) is turned into polysilicon for solar panel production. China produces about 70% of the world's MGS and 77% of the world's polysilicon. Converting silicon to polysilicon requires very high temperatures, and in China it's coal that largely fuels these plants. Xinjiang—a region in China of abundant coal and low electricity prices—produces 45% of the world's polysilicon.

Reports indicate that some Xinjiang polysilicon plants have employed forced labor of Uyghurs, an intensely persecuted Muslim ethnic minority."

-and-

"Ten percent of the world's silver is used for solar panels today, and that brings its own share of problems to the supply chain.

Silver mining, based mainly in Mexico, China, Peru, Chile, Australia, Russia, and Poland, can sometimes cause heavy metal contamination and community displacement. In Guatemala, the Indigenous Xinka community collected more than 85,000 signatures calling on Pan American Silver to avoid restarting its dormant operations due to water contamination, failure to justly consult the community, and potential involvement in threats directed at nonviolent protesters. In La Libertad, Peru, a 17-year-old mine stopped operating in 2012 after five emergency declarations of high levels of metal contamination in the Moche River."

Below is a comparison photo by Deutsche Welle of a mine on the Indonesian island of Obi and the village of Kawasi, expanded and exploited by a Communist Chinese-owned metals giant Lygend. The people of Kawasi relied upon fishing and agriculture, but the mine has destroyed the landscape and poisoned the water. "Clean and green"? Only so long as we remain oblivious to or uninformed about the environmental damage we do in other parts of the world to a people who are not Australians or Tasmanians!



Closer to home, along the Highland Lakes Road, intersecting with the Midland Highway at Melton Mowbray, through Bothwell to Cellars Hill, vicinity of the intersection of Waddamana Road, during the construction phase of the Communist Chinese owned Goldwind windfarm, trucks hauling extra wide and long loads held up traffic for twenty to thirty minutes on the side of the roads, regardless that those commuters were mostly shift workers, those going to Hobart Airport, or into Glenorchy and Hobart for medical treatment. Is it fair or right for residents of the Central Highlands, particularly Bothwell, be inconvenienced for up to two years, yet again, during the construction of Cellars Hill windfarm?

The Highland Lakes Road is not well suited for haulage of such large and heavy loads. The edge of the road is soft and steep and unsafe for commuters to safely pull off the road. The Highland Lakes Road is not sufficiently durable to take repeated heavy loads, with a section above Little Den Creek recently repaired, in March 2025. (Refer to photos) The Highland Lakes Road traffic needs to be genuinely considered. The Highland Lakes Road needs to have sufficiently wide Slow Vehicle lanes installed between Melton Mowbray and the construction site or the width of the road surface widened so that commuter traffic does not have to pull off and sit idle for twenty to thirty minutes on the side of the road. The shoulders of the roads need to be widened and strengthened for non-construction vehicles to pull off safely. The curves need to be straightened to prevent another truck rollover. Residents, commuters, shift workers (and their employers), those catching or meeting flights, or making doctor and hospital appointments should not be inconvenienced, so some farmer can make \$45,000 per year per wind turbine. It is selfish to make everyone else pay, on one way or another.

Thus, as well as upgrading the Highlands Lakes Road, a traffic impact assessment should be done from Melton Mowbray to the entry of the windfarm construction site, especially if the construction traffic adverse impacts and inconveniences local residents and commuters, every day of their lives, for two years to complete the windfarm construction. Commuter traffic from Miena and further north would also be adversely affected, though to a lesser extent, but should be taken into consideration. The Highland Lakes Road is an ideal secondary route for all road users travelling between the north and south of the state or vice versa.

For further consideration, by restricting heavy vehicle construction traffic on the Highland Lakes Road to drive from Melton Mowbray to the entrance of the construction sight to hours between midnight to 6:00 a.m. would reduce the need for upgrades and inconvenience to all other road users, including Tasmania Police, Tas Fire Service and Ambulance Tasmania.



Location Info
 Lat/Lon: S 42°25'12" (42°25'12")
 Longitude: E 147°35'35" (147°35'35")
 Altitude: 351.00m
 Altitude Reference: Sea level
 UTC: 2025/03/01 20:07:19.00
 Map Datum: WGS 84



The wind turbine blade lies partly on the road after the truck rollover near Bothwell.

Picture: TASMANIA POLICE



Cranes needed to move blade

CHANEL KINNIBURGH

CRANES were called in to move a 68m wind turbine blade from Highland Lakes Road after a truck rollover near Bothwell yesterday.

Emergency crews were called to the crash at Apsley, 3km to the Bothwell side of the intersection with Lower Marshes Rd, about 5.30am.

The road was closed in both directions while a "thorough investigation" was conducted.

Inspector Philippa Burk said the truck driver was able to leave the cabin of the freightliner prime mover before it rolled. She said it was "extremely lucky" nobody was injured.

"The truck has failed to negotiate that sweeping left-hand bend and tipped over carrying the blade," she said.

"The driver of the truck has no injuries and no other vehicles were involved."

Inspector Burk said the road was expected to remain closed until about midnight. "This will be a massive recovery operation, obviously involving cranes," she said.

The blade was on its way to the Cattle Hill Wind Farm, located on the eastern shore of Lake Echo in the Central Plateau. Transportation of over-size turbine components from the Port of Bell Bay to the Cattle Hill Wind Farm project site has been ongoing since March.

Deliveries are expected to be complete next month, with a total of 528 over-size loads required for the 48 turbine project.

WorkSafe Tasmania attended the scene and is conducting an investigation.

Tasmania is world-renowned for its pure air and dark skies, for astronomical observation.

Geographically isolated, night time in Tasmania is incredibly dark and viewing the night sky or making astronomical observations is undiminished by light pollution, as it would be in any of Australia's other capital cities and large population centres.

Any skyward light pollution must be prevented to preserve “dark skies”.

“Light pollution is the fastest growing pollutant in the world, increasing by at least 49% around the planet between 1992 and 2017.” A study called the ‘*New World Atlas of Artificial Sky Brightness*’ revealed that more than 80% of the world live under skies polluted by poorly controlled and efficient lighting. The Milky Way is hidden from more than one-third of humanity, yet we can clearly see it from our own back yards in Tasmania. See my attached photo taken by me using my Nikon D3X, a camera not known for its astrophotography capability, below.



If artificial light is wasted polluting the sky, then it is not illuminating streets, homes, businesses, or providing security lighting.

“Palawa/Tasmanian Aboriginal People’s connections to milaythina wurangkili (Sky Country) hold important teachings about place and spirituality. Protecting the night—liwari in palawa kani—from light pollution is critical to the environment, wildlife and our wellbeing.”

Protecting Aboriginal heritage should not be just about identifying and preserving what is tangible. For additional consideration, if light pollution adversely affects humans viewing the night sky, then it would surely adversely impact on native wildlife and their habitat and their ability to hide from predators and from predators stealthily hunting at night, using their more sensitive eyes than humans have. Light pollution adversely affects bats feeding on flying insects attracted to light. Light pollution adversely affects owls and Tawny Frogmouth birds.

Dark Sky Sanctuary: a classification certified by Dark Sky International (DSI), which acknowledges the rich, organic night skies of the most remote (and often darkest) places in the world.

Further, how much does Tasmania value tourism? According to Tourism Tasmania, *“In Tasmania, one in eight jobs are supported by tourism, or 43,000 local jobs. Visitors spend more than \$3.6 billion annually in Tasmania contributing to our state economy and helping to fund schools, roads and hospitals. For every one-dollar visitors spend, another 83 cents is generated in our economy.”* The Spirit of Tassmania offers ‘A Stargazer’s Guide to Exploring Tasmania’s Southern Skies’. How many tourists would travel through the Central Highlands along Highland Lakes Road from Devonport?

Tourists have been attracted to Tasmania as the awareness of it being an easily accessible and ideal location to view the aurora australis for the full length of the state, but the more light pollution allowed by careless or thoughtless planning will merely discourage those tourists from visiting Tasmania. I took the below photo of a truly glorious aurora australis, from Bothwell, just a short walk from my backyard. Look closely and you can see the light pollution of the horizon from Hobart 72 kilometers away, not a mere 9



Tasmania Planning Commission mandating responsible lighting that would prevent light pollution skyward would go a long way toward preventing

unnecessary light pollution and preserve Tasmania's dark skies, especially in rural settings.

Tasmania Planning Commission and assessed Planning Schemes have deliberately and thoughtlessly avoided establishing "Scenic Landscape Values" and "Scenic Road Corridors". Trust me when I write that tourists would not travel half way around the world or across country to visit Tasmania to walk among wind farms or photograph wind turbines. Does Tasmania value tourism and the \$3.6 billion annual income to Tasmania contributing to our state economy, or not? The Central Highland municipality has no protection of "Scenic Landscape Values" and "Scenic Road Corridors". We cannot trust that ReCFIT or others to make those assessments on our behalf, those assessments should be mandated by the Tasmania Planning Commission.

For further consideration, there should be a minimum number of local employment opportunities specified by Tasmania Planning Commission that would directly benefit Bothwell and other Central Highlands community residents who would commute to work at the wind farm, both during construction and afterward. The Tasmania Planning Commission and Tasmania government should legislate owners and operators of wind farms or renewable energy projects pay their fair share of Council Rates or its equivalent to Councils or provide in-kind infrastructure projects to them.

Lastly, considering Mr Paul West (River Road Consulting) served as a consultant with Central Highlands Council wouldn't the Tasmania Planning Commission surmise that he would have "insider" knowledge and information? Whilst I like and respect Mr Paul West, is it appropriate or a "conflict of interest" appointing him as Chairman receiving, assessing and/or replying to Representations for a development within the Central Highlands municipality? (see attached pdf)

References:

<https://www.dw.com/en/leaked-documents-reveal-the-hidden-cost-of-indonesias-nickel-boom/a-72390311>

<https://www.theaustralian.com.au/inquirer/once-upon-a-time-in-the-green-energy-transition/news-story/50d58f8861526f8e5e1c142b9803dd99>

<https://blog.ucs.org/charlie-hoffs/mining-raw-materials-for-solar-panels-problems-and-solutions/>

<https://www.theguardian.com/global-development/2025/apr/30/environment-water-pollution-green-transition-indonesia-harita-nickel-metal-mining-electric-vehicles-erin-brockovich-chromium-cr6>

<https://www.bloomberg.com/features/2024-indonesia-sulawesi-nickel-fire/>

TASMANIAN PLANNING COMMISSION

Cellars Hill Wind Farm Major Project Draft Assessment Criteria and Draft MNES Guidelines Invitation to make a representation

The Development Assessment Panel for the Cellars Hill Wind Farm Major Project invites representations on the draft assessment criteria and draft guidelines for assessment of matters of national environmental significance.

The Cellars Hill Wind Farm Pty Ltd proposes to develop and operate a windfarm, battery energy storage and associated infrastructure near Bothwell, within the Central Highlands of Tasmania, approximately 72 km northwest of Hobart.

The major project was determined to be a controlled action on 14 March 2025 under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) to be assessed by accredited assessment under the *Land Use Planning and Approvals Act 1993*.

The relevant matters protected by the EPBC Act are listed threatened species and communities (sections 18 and 18A), and listed migratory species (sections 20 and 20A), including, but not limited to:

- Tasmanian Wedge-tailed Eagle (*Aquila audax fleayi*); and
- Latham's Snipe (*Gallinago hardwickii*).

The draft assessment criteria, draft guidelines for assessment of matters of national environmental significance (MNES guidelines), and major project proposal can be viewed in person at the Commission's offices from 9am until 5pm, Monday to Friday at Level 3, 144 Macquarie Street, Hobart. They may also be viewed and downloaded from the Commission website at www.planning.tas.gov.au.

Comments can be made in writing to the Commission from 17 July 2025 until 30 July 2025, by email to tpc@planning.tas.gov.au, or post to the Tasmanian Planning Commission, GPO Box 1691, Hobart, TAS 7001.

If you require further information please contact the Tasmanian Planning Commission on 6165 6828 or by email to tpc@planning.tas.gov.au

Paul West

Chairperson