

The Chair
Paul West
Tasmanian Planning Commission
tpc@planning.tas.gov.au

Representation on Cellars Hill Wind Farm Draft Assessment Criteria and Draft MNES Guidelines.

Dear sir,

Thank you for the opportunity to comment on the draft Criteria and Guidelines. Major changes and additions are needed so the TPC Panel can make an informed decision about the Project as indicated below.

Please note this is a personal representation as a shack owner at Shannon, in the Central Highlands, and close to the Project area; and not as the Chair NTAG. I travel through the project area, fish in the project area, value the landscape and uniqueness of the Central Highlands, and use the Diamond Tier area for recreation. I have an intimate knowledge and experience of the area. As a forester, I am competent in Threatened and EPBC flora and fauna matters and industry development underpinned by sustainable development. Please take my suggestions seriously.

The draft Criteria and Guidelines need to be changed to include the following - otherwise the TPC Panel will not be properly informed and may come to incorrect conclusions.

- **The final Criteria and Guidelines document must include ‘Onshore Wind Farm Guidance. Best practice approaches when seeking approval under Australia’s national environmental law (May 2024)’** as its core reference document for the Proponent to follow. It is DCCEEW’s document for developers to use so the Commonwealth Environment Minister (and therefore the TPC Panel) has the right information to make a legal approval decision consistent with the *EPBC Act*. It is more complete and more authoritative than that in the current draft and is tailor made to slot into the final document.
- **The final Criteria and Guidelines document must include use of solar farming for all or part of the Project. It must be assessed as a viable alternative in lieu of some or all of the wind turbines.** It has a smaller footprint; effects about 800ha rather than 8000ha; has a lower impact MNES matters; overcomes skyline and ridgeline impacts; and will avoid blade collisions, death and injury for Tasmanian wedge-tailed eagles and the more problematic Blue-winged parrot and White throated needletail. It will also provide the same economic and community outcomes as wind turbines by providing 350MW capacity but at a lower environmental, landscape and community cost. Use of solar is viable as shown by Weasel Solar Farm being developed by the same Proponent, in the same area, and as part of the same Renewables Hub development.
- **The final Criteria and Guidelines document must require a proper review of the usefulness and shortcomings of the IdentiFlight collision avoidance system at the Cellars Hill Project. The review must include a peer review and community consultation.** The Proponent has said the IdentiFlight system will be used but there is no specific Criterion about IdentiFlight in the document. Even though IdentiFlight has been used at the adjoining Cattle Hill Wind Farm, there has been Blue-winged Parrot and White throated needletail deaths (both EPBC Listed species) over the past three years. IdentiFlight has been presented as a panacea for eagle

deaths by the wind turbine industry and Regulators. It looks promising but has limitations which need to be understood.

- **The final Criteria and Guidelines document must overtly require noise and nuisance noise to both be properly assessed and conservatively modelled.** Noise requires a separate Criterion in the document and not be 'hidden' amongst other text. A precautionary approach must be applied including the use of a Ground Factor of zero ($G=0$) and the use of a tonality/SAC penalty of 6dB in the modelling. A sensitivity analysis of the assumptions behind the modelling must be presented so the error bounds and risk of non-compliance can be understood. An assessment of cumulative impacts of noise and nuisance from Cattle Hill, Bashan, and Cellars Hill Wind Farms at Diamond Tier requires special attention because a formal Game Management (Hunting) area exists, family activities occur, and because recreational activities and equestrian/horse riding occur. It must be treated as an amenity sensitive area.
- **The final Criteria and Guideline document must require stronger requirements for visual and landscape impact assessment and solutions.** Visual impacts of a ridgetop turbines in the barren landscape are a major community concern. Criteria are needed that require the Proponent to undertake and apply a Visual Landscape Assessment (so the broader landscape impacts on the community are resolved), apply Tasmanian Planning Scheme Zone requirements (so immediate neighbour impacts are addressed), and use 75mm full format imaging for photomontage work (so accurate and better-informed decision making occurs).

Adoption of these inclusions in the final Criteria and Guidelines document will go a long way to securing a social licence to operate from the community, can easily be achieved by the Proponent, and will provide a viable renewable energy development of about 350MW capacity.

Please contact me if any clarification is required.

Yours sincerely

[Redacted]

David Ridley

Ph [Redacted]
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