

Tasmanian Planning Commission
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Representation on the draft guidelines for the assessment of Matters of National Significance for the Cellars Hill Wind Farm proposal.

Dear Mr West

Thank you for the opportunity to comment on the draft guidelines for the major project assessment of the Cellars Hill Wind Farm proposal in the Central Highlands of Tasmania.

The proposal site is critical habitat for at least 36 flora and fauna species that are in decline including key species that constitute matters of national significance under the EPBC Act. It is therefore important that the guidelines for assessment include consideration of the cumulative impacts to the common MNES species at other existing (Cattle Hill Wind Farm) and proposed near-by wind farm sites (St Patricks Plains, Bashan Wind Farms) in the Highlands.

The importance of maintaining biodiversity in Tasmania's Highlands cannot be understated.

Conservationist Margaret Moorhouse (Life Member and past President of NQCC) states, 'Biodiversity is a concept that is widely misunderstood. It pertains to the intrinsic value of natural areas having a combination of large size and high ecological integrity. Although it is often quantified by numbers of species. Biodiversity is unlike material or mathematical concepts, in that it should not be divided, cannot be fragmented, cannot be conserved or preserved out of its context, it is its context.'

The proximity of four wind farms in an area of approximately 40,000 hectares has the potential to fragment species, severely reduce critical habitat availability with so called mitigation measures such as offsetting having little effect and compounding impacts on MNES on a grand scale.

Rather than a wind farm project-by-project assessment of environmental impacts, a regional landscape and habitat assessment of ecological sustainability would help identify areas that should not be developed and areas where developments have low impacts with rapid assessment processes possible. Areas where solar installations would be more appropriate to avoid significant impacts of wind turbines could also be identified, such as the unopposed and recently approved Weasel Plains solar proposal near Bothwell.

Forestry operations and land clearing over many years have contributed to eliminating, reducing and marginalising MNES species in the region. Changing climate patterns also present challenges to sensitive subalpine species, some of which are found nowhere else in the world. What remains is precious with the threat of extinction from further disturbance and dislocation from poorly sited projects exacerbating the process and contributing nothing to their recovery.

The requirement in the assessment criteria in the Draft Guidelines at 3.7 and 6.1.11 for the proponent to include consideration of the cumulative effects to MNES species common to other nearby established and proposed developments, however, does acknowledge the regional

importance of threats to habitat loss and fragmentation. The hierarchy guiding principle of avoidance in the first instance must be highlighted in all MNES aspects of this project.

The following suggestions are made, based on my knowledge of the area, my research and current best practice protective measures for endangered and vulnerable species on and near the project site to help formulate the final guidelines for the Cellars Hill proposal.

1. Information on total area of habitat for each relevant protected matter (5.2.7). The proponent should be required to include the total habitat in not only the project area and surrounds but include the area of habitat at each of the operating and proposed wind farm sites in the total area.
2. The Draft Guidelines at 7.1.2 require the proponents to discuss the measures employed to avoid, minimise and mitigate risks of MNES species from turbine strike.

Dr Megan Murgatroyd has developed a predictive model for improving placement of wind turbines to minimise collision risk potential for a large soaring raptor. While Tasmanian environmental decision-makers are accepting 1km static buffers around eagle nests (based on no scientific research) to reduce collision risk (and breeding disturbance), Murgatroyd's analysis shows that static 3km circular buffers are oversimplified and often miss actual eagle use flight zones for turbines. Dr Murgatroyd's model provides greater eagle protection, a site specific and topographically informed buffer zone (including various shapes, not just circles), with higher sensitivity to actual eagle space.

Dr Murgatroyd's scientifically based model (**Murgatroyd, M., W., & Amar, A (2020). A predictive model ... Journal of Applied Ecology**) and her more recent follow-up research (**Murgatroyd and Amar, accepted 2025. Applied solutions ... Ecology and Evolution preprint**) should be required to be applied to turbine placement and buffer distances around WTE nests. Her research information should be provided to the proponents in Appendix C.

Dr James Pay, University of Tasmania researcher, has conducted extensive research using high frequency GPS tracking to study the movement ecology, collision risk behaviour and spatial habitat use of Tasmanian wedge-tailed eagles. His scientific data should be a reference for proponents to avoid placing turbines in established eagle flight paths and high utilisation areas. Dr Pay's research must be included in Guidance Materials listed in Appendix C. **Pay et al. (2022 analytical framework) – behaviour specific habitat selection modelling using high temporal-resolution GPS telemetry.**

At 7.1.2 e) the Draft Guidelines require the proponents to consider artificial intelligence that can detect MNES at risk from turbine collision impact.

- The placement of AI collision avoidance systems such as IdentiFlight (trialled at Cattle Hill Wind Farm with 5 eagle collisions in its third year of operation) need to be considered in relation to the turbine placement modelling outlined above and each unit should be included on site plans with specification details. Each unit poses a collision threat with guy ropes posing additional hazards for avian collision.
- The AI system that is proposed must be a scientifically rigorous technology that has been peer reviewed.
- The ability of the system to operate in varying low visibility weather conditions such as fog and snow needs to be outlined.
- Proponents need to provide curtailment details for each MNES avian species at risk and demonstrate how each species can be detected concurrently.

- Consideration of avian species with nocturnal behaviours such as masked owls and white-throated needletails needs to be a requirement.

3. The draft guidelines (7.1.3) require a discussion of the measures employed to avoid, minimise and mitigate impacts on MNES from habitat loss and fragmentation as stated:

7.1.3 b) avoidance of raptor nests including but not limited to Tasmanian wedge-tailed eagle and masked owl (Note: the Threatened Tasmanian Eagles Recovery Plan 2006 – 2010 outlines breeding season buffers against disturbance of 500m and 1000m in line-of-sight to protect nests from disturbance.)

The Threatened Tasmanian Eagles Recovery Plan (2006 – 2010) was made in a time before a proliferation of wind farms, it has expired and has not been updated. There is no recovery plan in operation to ensure best practice conservation management actions are applied to avoid disturbance to endangered Tasmanian wedge-tailed eagles during wind farm construction. The plan's recommended breeding season buffers against disturbance were implemented nearly 45 years ago for nests in forestry operation areas – a vastly different activity compared to assembling turbine structures up to 270m tall. The outdated and inappropriate buffer distances are not supported by current research or evidence.

In the absence of a Threatened Eagles Recovery Plan the current guiding documentation to protect Tasmanian wedge-tailed eagles from habitat loss and breeding disturbance has been published by the Department of Natural Resources and Environment (NRE) Tasmania

[Wedge-tailed Eagle - Threatened Species Link](#)

Disappointingly this up-to-date guidance documentation is not included in Appendix C. The information and scientific advice need to be the basis for the proponent's planning to avoid disrupting and disturbing this species at a critical time. Avoidance principles need to be applied to assist the recovery process as the NRE Threatened Species Link document states for developers during construction:

- *To reduce the potential for disrupting breeding – do not create noise or visual disturbance (e.g. construction activities) within potential view or earshot of an eagle nest during the breeding season.*
- *To avoid disrupting breeding – do not construct developments which could result in future disturbance near a nest or potential nesting habitat during the breeding season.*

4. Offsets

Offsets should only be considered in relation to the availability of prime habitat in the broader area. Fines for deaths from wind farm impacts are not acceptable offsets for MNES species. Offset agreements and conservation areas that have been established or proposed for existing and future developments in the area should be identified and mapped.

5. Noise

Noise impacts on each MNES fauna species need to be considered for each stage of the proposed development.

Conclusion

Given the extraordinary ecological values of the Central Highlands region—particularly its concentration of threatened species and Matters of National Environmental Significance—the assessment of the Cellars Hill Wind Farm proposal must be underpinned by the highest standards

of scientific evidence, transparency, and precaution. The cumulative effects of multiple wind farm developments in this landscape cannot be overstated and must be comprehensively assessed using a regional, landscape-scale approach rather than a narrow, project-by-project lens.

The final guidelines should incorporate the most current and credible scientific research, including site-specific modelling of turbine impacts on raptors and species-specific considerations for collision risk, disturbance, and habitat fragmentation. Avoidance—not offsetting—must be the primary guiding principle, especially where extinction risks are present.

I respectfully urge the Commission to strengthen the draft guidelines by requiring rigorous, ecologically informed, and precautionary assessments that prioritise the protection and recovery of MNES species. Thank you for the opportunity to provide input.

Yours sincerely

A solid black rectangular box used to redact the signature of Victoria Onslow.

Victoria Onslow

29 July 2025