

BELL BUOY BEACH RESIDENTS ASSOCIATION

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To the Development Assessment Panel,

On behalf of the residents of Bell Buoy Beach, the Bell Buoy Beach Residents Association provides the following for the consideration of the Panel when making a decision on the suitability of the major project known as Bell Bay Wind Farm.

Bell Buoy Beach is a coastal town in the North of Tasmania, just a few minutes north east of George Town. With soaring views over Bass Strait, residents and holidaymakers experience beautiful sunsets and watch the weather roll over the ocean. Bell Buoy Beach offers a relaxed, coastal lifestyle for those wanting to unwind. (placenames.tas.gov.au)

The residents of Bell Buoy Beach have significant concerns with regard to the suitability of this project in the proposed area. These include but are not limited:

Enviromental Issues

We are deeply concerned about the environmental impacts that this proposal could have upon both the designated windfarm area but also the surrounding environments. We support the studies already undertaken, and those proposed to be undertaken, but feel that they lack depth and focus on the environment of the area proposed. Many of the completed studies were desktop studies or very limited field studies and we support the more comprehensive field assessments suggested in Table 8 and Table 9 of the Wind Farm Proposal. (attachment 1) We are particularly concerned about the completed Raptor Survey, which is only current to February 2024. These studies do not include areas of known Wedge Tail Eagle activity, for example the property known as "Muskvale" on Soldiers Settlement Road.

The preliminary studies do not mention the Hooded Plover (*Thinornis Cucullatus*) which is also resident in the Bell Buoy Beach area and currently considered endangered. They nest on the Coastal dunes but also in nearby wetland areas, as found in the proposed envelope of the Wind Farm.

There are also significant numbers of Tasmanian Devils (*Sarcophilus harrisii*) within the proposed Wind Farm and general Bell Buoy Beach area. They are considered endangered. Devils are nocturnal and live in coastal heath, open dry sclerophyll forest, and mixed sclerophyll-rainforest of the type found within the proposed Wind Farm envelope.

These are only small examples of the known Fauna and Avi-Fauna that are common to the area, detailed assessments are required.

There are conservation areas within and adjacent to the Wind Farm envelope including the area known as Five Mile Bluff conservation area and the private forest Fozards Conservation Covenant. Buffer zones are mentioned in the Wind Farm proposal but need to be clearly determined, including those to conservations areas, residential areas and foreshore areas.

Other Proposed Studies to be Undertaken

Table 9 of the Wind Farm Proposal lists multiple other Consultant studies to be undertaken, many of which are concerns for the residents of the area.

Traffic

The roads providing access to the Wind Farm area are currently typical 2 lane, Council maintained bitumen country roads with gravel drop-off verges. Soldiers Settlement Road, which is listed as the main access point for the Wind Farm development is rough, narrow and in places winding, with constant pot hole issues. It is not suitable for heavy vehicles, and in its current form would not allow access to oversize vehicles of the type required to move Wind Farm components into place. Nor would it stand up to the increased use that would occur with this project.

Movement of these large components from the port at Bell Bay to the proposed site would require significant road updates, which brings with it, its own set of problems. Disruption to residents' access and egress, environmental issues from the construction of a larger access road from the increased fossil fuel use, to the dust and land resumption that would be required to name two. Table 9 of the Wind Farm proposal does not go into enough detail of the impact on the current road, or the implications of widening and straightening the road to make it suitable for the large vehicles and components that would be using the roads. This needs to be addressed.

It needs to be noted that there is only one access and egress point for the residents of Bell Buoy Beach and that is along Soldiers Settlement Road. Road closures and delays due to road works or movement of components creates a risk for residents. In the event of a bushfire for example, how are residents to safely evacuate if Soldiers Settlement Road is closed for any reason. Also of concern is the access of emergency services vehicles during any time the road may be closed or work being done to it that increases the time emergency services can access Bell Buoy Beach or return to George Town.

Noise

One of the greatest concerns of the residents of Bell Buoy Beach is the noise component of the proposal. Bell Buoy Beach is an extremely quiet area. It is a no through road precinct and one of the primary reasons for most residents' choice to live here is peace and quiet, away from things like traffic, commercial and industrial areas and the noise that is common to areas

like that. The proposed Wind Farm would alter that ambience, both in construction and operations. Whilst the Wind Farm proposal mentions mitigation measures, it is not clear what those measures are and how they are going to be implemented.

We are also concerned about the detrimental effects of infrasound on residents and animal species. Latest research indicates infrasound can be heard and felt up to 10 kilometres from turbines. How does the proposal intend to eliminate or severely mitigate this, currently the proposal does not discuss this issue in detail.

Cultural Heritage

We support the assessment of both Aboriginal and European Cultural Heritage Studies. Traditionally the European cultural heritage is the quiet beachside lifestyle practiced by the Residents both recent and longstanding.

The Residents Association does not seek to speak for local indigenous communities but supports their concerns about this proposal. We recognise, respect and acknowledge the Traditional Custodians of the land on which we live, the Palawa People from the Leterremairrener clan of Port Dalrymple. We recognise and respect their cultural heritage, beliefs and continuing connection with the land and waterways and acknowledge that Sovereignty was never ceded.

Visual Impacts

Bell Buoy Beach is a pristine beachside community, the only visual impacts are resident housing. There are no street lights, no footpaths and approximately 6 habitated residential streets.

The suggested height of the turbines in this proposal would significantly and adversely affect the visual amenity of the area. The previous Wind Farm proposal was for significantly lower turbines with fewer numbers. We would certainly prefer to see lower turbines with reduced visual impact on our area.

Shadow Flicker

We support a full Shadow Flicker Assessment for the Bell Buoy Beach area, and note that mitigation of other wind farms has shown that shut down of specific turbines at particular times of the day in relation to sun contact with blades has been part of the mitigation of shadow flicker and support this kind of mitigation as a minimum for our community.

Electromagnetic Fields and Communications Study

Wind Farm operations are known to cause interference to communications. Bell Buoy Beach relies on mobile phone coverage which is currently limited with many in the community using Wi-Fi calling to communicate both within and externally to the community. Broadband internet services are not available to the majority of the community and we rely primarily on Satellite services for internet and phone connectivity. If approved significant mitigation throughout the community would be required to ensure residents maintain connectivity of

phone and internet services. We envisage further communications infrastructure would be required to achieve this.

Electromagnetic fields are of deep concern to residents. Current research shows that EMF's have a negative impact on human and fauna species, and any approval of this project requires significant specialist input to prevent any health-related negative impacts.

Fire Management

The project proposal states that it '...will comply with relevant fire related legislation and conditions for Northern Tasmania' (pg. 39, Table 9). We question how this is possible within a bushfire danger zone, and is discussed further in other concerns of this submission.

Surface Water Quality and Groundwater

There are known sensitive areas within the Project area, and we support specialist assessment and input to adequately identify these areas and how they can be maintained for the use of resident fauna especially.

Socioeconomic Impact Assessment

The current project proposal does discuss some of the possible benefits on the larger community, however, it does not discuss the negative impacts upon communities like Bell Buoy Beach. These are the impacts that particularly concern us. Feedback from community members to the Residents Association includes but is not limited to;

- Impact on property values, i.e. part of the value of homes in Bell Buoy Beach is the quiet, natural environment in which these homes exist. We are concerned that the proposed Wind Farm will negatively affect the aesthetics and values of our properties.
- Impact on economic income, i.e. there are several Airbnb properties in Bell Buoy Beach which are marketed around the pristine natural environment away from large towns and infrastructure.
- Recreational effects, i.e. Bell Buoy Beach is used for coastal walking and exploration, wind-based sporting activities (windsurfing and paddleboarding as examples), swimming, surfing and other beach related activities. Part of the appeal of Bell Buoy Beach is the quiet unspoiled environment free from commercial and industrial activities.
- Community benefits, i.e. will the local community benefit in terms of jobs created in the construction and ongoing management of the proposed wind farm. Will local residents directly impacted by the proposal receive any benefits in terms of subsidised power, community battery etc.
- Future useability, ie. What impact would a wind farm in the proposed area have on the future useability of the land in the Wind Farm envelope and on those of the surrounding properties.

Aviation

We support a detailed Aviation Impact Assessment to be undertaken with particular reference to the George Town Airport which is situated on Soldiers Settlement Road.

Community Engagement

Bell Buoy Beach residents are particularly concerned about the activities to be carried out under the strategy proposed. So far community engagement has been one (1) mail out that was addressed to residential addresses and one (1) community meeting.

Bell Buoy Beach does not have a residential mail service. In order to receive mail, we have to maintain individual post office boxes in George Town. Sending information to the residential address does not inform the community unless the staff of the George Town Post Office can identify the intended recipient. There are residential land owners who are not permanent residents of Bell Buoy Beach and as a result have not received the information package.

The 'town hall' style meeting was informative for those who had not been able to read the mail out discussed above but did little to alleviate individuals ongoing concerns.

The proposal identifies a full range of engagement activities will be carried out. We would like to know what they are and how ongoing contact with residents is to be managed.

Agricultural Land Use

We support an Agricultural Land Use Assessment as discussed on page 39 (Table 9) of the proposal. We would also like the agricultural land surrounding the proposed site to be included in the Assessment given the impact the wind farm could have on surrounding areas.

Air Quality and Emissions

We support specialist input to investigate potential emissions produced during the construction and operation phases of the Project but would draw your attention to the further concerns under the Concrete Production and Battery sections of this submission.

Waste

The area of the proposal does not have connection to sewerage facilities, or waste water disposal infrastructure. Residential garbage services are available. A full assessment and management plan is required for this site. We further discuss waste management under the Concrete Production and Battery sections of this submission.

Acid Sulphate Soils

We support a full Acid Sulphate Soils assessment and if they are found to be present in the Wind Farm envelope how will they be mitigated and managed.

In the following section we draw your attention to several areas that we feel are not adequately discussed or evaluated in the Wind Farm Proposal as it exists.

Battery

The wind farm proposal states that it will also include the construction of large-scale battery energy storage system (BESS) with a capacity of 100MW/400MWh within the area envelope.

The proposed area is a bushfire prone area. Large scale batteries are known fire hazards. The proposal has little to no information on how this fire hazard is to be managed. In fact, we do not know from the proposal what form the BESS is to take, is it the dominant Lithium-Ion type or the Vanadium redox or Sodium ion type which are used overseas and likely have lower fire risks.

BESS are known to suffer what is known as ‘thermal runaway’, which is where the battery combusts internally without a visible external cause. Unlike a normal fire that can be starved of oxygen and put out with water, a thermal runaway releases great heat simply through the uncontrolled reactions of the chemicals with the BESS. This was seen in the Victorian Big Battery incident on July 30, 2021.

The Australian Energy Council (AEC) has a report on the dangers and management of BESS which can be accessed from their website that further explains the risks of these types of battery storage systems. It also explains in greater depth the other dangers associated with BESS including toxic gas venting.

The Bell Bouy Beach community would like to see further research about the feasibility of a BESS in the proposal envelope. We are concerned about the obvious bushfire risk, but also risks from the release of dangerous gases. Given there is only one access and egress point from Bell Buoy Beach which includes traversing Soldiers Settlement Road, what protections are to be put in place to manage emergency movement.

Concrete Production and Quarry

The proposal states that concrete production would be carried out on site. We have obvious concerns about this due to the environmental issues that surround concrete and its use and production.

How would these be mitigated and how would the area be returned to pre wind farm conditions when 28 large concrete stands are erected in the areas. Research shows that the base of a wind turbine requires between 600-800 cubic metres of concrete. This is a weight of approximately 2000 tonnes.

During the construction phase of these stands, we would see increased heavy vehicle traffic on Soldiers Settlement Road with the dangers as already discussed above. Quarrying of the land and production of the cement would also produce excessive amounts of dust which have further implications for the health of nearby residents.

Further studies on the impact of concrete production and use need to be conducted and mitigation plans put in place.

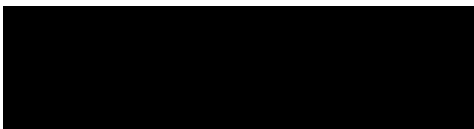
Noxious Weed Management

The proposed wind farm area consists of significant amounts of the declared noxious weed Gorse (*Ulex europaeus*). There is no mention of this in the proposal or how under the Weed Management Act 1999 the invasive species is to be managed.

There will be significant traffic into and out of the proposal area which should include biosecurity measures. Vehicle inspections, dedicated washdown areas with appropriate waste water management, foot baths for all people entering and exiting the site as a minimum requirement.

The Bell Buoy Beach Residents Association asks that you consider the points raised in this letter in your assessment of the proposed Bell Bay Wind Farm. This list of residents' concerns is not exhaustive and we would be more than happy to discuss this proposal with the Committee at any time to further extrapolate our concerns.

Yours faithfully,

A large black rectangular redaction box covering the signature of the President of the Bell Buoy Beach Residents Association.A small black rectangular redaction box covering the name of the President of the Bell Buoy Beach Residents Association.

President Bell Buoy Beach Residents Association.

Image of Hooded Plover