

Environment Protection Authority

GPO Box 1550 HOBART TAS 7001 Australia

Enquiries: Liz Richardson
Phone: 0472 565 495
Email: liz.richardson@epa.tas.gov.au
Web: www.epa.tas.gov.au
Our Ref: D25-121786



30 July 2025

Paul West
Chairperson, Development Assessment Panel
Tasmanian Planning Commission
GPO Box 1691
HOBART TAS 7001

By Email Only: tpc@planning.tas.gov.au

Dear Paul West

CELLARS HILL WIND FARM MAJOR PROJECT REPRESENTATION IN RELATION TO DRAFT ASSESSMENT CRITERIA UNDER s60ZL(2) OF THE LAND USE PLANNING AND APPROVALS ACT 1993

I write regarding your letter of 16 July 2025 advising that the Development Assessment Panel (the Panel) for the Cellars Hill Wind Farm Major Project (the Major Project) has prepared Draft Assessment Criteria. Your letter also gave notice of the exhibition of the Draft Assessment Criteria in accordance with section 60ZL(1) of the *Land Use Planning and Approvals Act 1993* (LUPAA).

The EPA Board Policy - Operational noise level limits for wind energy projects

On 1 July 2025, the Board of the Environment Protection Authority (EPA Board) adopted a new policy (see attached *EPA Board Policy - Operational noise level limits for wind energy projects*) for assessing operational noise from wind energy projects under the *Environmental Management and Pollution Control Act 1994* (EMPCA). The new policy supersedes any previous policy of the EPA Board regarding noise criteria for wind energy projects. The new policy commences 31 July 2025 and will apply to all wind energy projects currently under assessment, including major projects. The EPA Board's final guidance for the Major Project will reference the new noise policy to allow appropriate assessment under EMPCA, consistent with other wind energy developments.

I note that staff from the EPA Assessments Branch met with Michael Hogan and Luke Newman of the Tasmanian Planning Commission on 21 July 2025 to advise them about the new policy and explain the further engagement that will occur over the coming weeks with the Tasmanian Planning Commission and Development Assessment Panels regarding the new policy. You will shortly receive further correspondence from me regarding the new noise policy.

EPA representation on Draft Assessment Criteria

The Environment Protection Authority (EPA) has undertaken a review of the Draft Assessment Criteria and is making a representation under section 60ZL(2) of LUPAA as outlined in this letter.

The Indicative Guidance provided in the EPA Board's Assessment Requirement Notice (ARN) on 11 March 2025 includes the information requirements that will allow the EPA Board to have a sufficient information base for its environmental impact assessment of the Major Project. The Draft Assessment Criteria reference this Indicative Guidance on page 55.

Criterion 3.12 of the Draft Assessment Criteria requires the sound level of operating wind turbines to comply with the *New Zealand Standard NZS6808:2010 Acoustics – Wind farm noise* (NZS 6808:2010) of 40 dB(A) or background +5 dB(A), whichever is the greater, including an assessment of whether a high amenity noise limit is applicable to locations zoned General Residential or Low Density Residential. This is inconsistent with the EPA Board's ARN and, more specifically, Section 4.1.8 of Schedule 2 of the EPA Board's Indicative Guidance, provided on 11 March 2025 which requires the proponent to predict operational noise levels and identify areas where the levels exceed the criteria of 35dB(A) or background +5dB(A).

The Draft Assessment Criteria requirement to comply with NZS 6808:2010 also conflicts with the EPA Board's new policy which requires the predicted equivalent operational noise level at any noise sensitive premises to not exceed the greater of 35dB(A) $L_{Aeq, 10 \text{ min}}$ or background (L_{A90}) + 5 dB(A). The EPA Board's new policy also requires proponents to use the EPA South Australia *Wind farms environmental noise guidelines 2021* (or the most recent revised version of that document) for assessing whether a wind farm can meet the design criteria specified in the new policy, except where that guideline may be inconsistent with the new policy.

Criterion 3.12 of the Draft Assessment Criteria requires the proponent to minimise the operating sound and vibration levels from substations, energy storage systems, and overhead power lines at noise sensitive premises to an acceptable level. This suggests that separate noise assessments and noise limits will apply to wind turbine generators and associated infrastructure. This is inconsistent with the EPA Board's new policy which applies to operational noise emissions of an entire wind energy project and is therefore inclusive of noise emissions from all operational project infrastructure, including wind turbine generators, substations, energy storage facilities etc.

If you wish to discuss any matters raised in this Representation, please contact Liz Richardson, Senior Environmental Officer, on 0472 565 495

Yours sincerely



Catherine Murdoch
DIRECTOR, ENVIRONMENT PROTECTION AUTHORITY

Att. EPA Board Policy - Operational noise level limits for wind energy projects

Application

This policy is adopted by the Board of the Environment Protection Authority (EPA Board) for the purpose of assessing wind energy projects and requiring conditions or restrictions in respect to wind farm noise under the *Environmental Management and Pollution Control Act 1994* (EMPCA).

This policy supersedes any previous policy of the EPA Board in respect to operational noise criteria for wind energy projects. This policy does not apply to construction noise.

This policy applies from 31 July 2025 and will apply to all wind energy projects currently under assessment. It remains in place until revoked.

Technical terms

L_{Aeq} means the A-weighted equivalent continuous sound level.

L_{A90} means the A-weighted sound level that is exceeded for 90% of the measurement period.

dB means decibel.

dB(A) means decibel when stating A-weighted sound pressure level.

Design Criteria

The predicted equivalent noise level at any noise sensitive premises should not exceed the greater of:

- a) **35 dB(A) $L_{Aeq, 10 \text{ min}}$; or**
- b) **Background (L_{A90}) + 5 dB(A).**

This design criteria applies to all noise emissions from the activity, inclusive of wind turbines and all ancillary infrastructure. It has been set for the protection of sensitive receivers during periods of low background noise.

The background noise for day, evening and night-time must be calculated separately to determine the applicable (lowest) background level, and is not to be averaged across a 24-hour period.

For predictive purposes, a difference of ~2 dB between measured $L_{A90, 10 \text{ min}}$ levels and $L_{Aeq, 10 \text{ min}}$ emissions from the activity must be noted. The predicted noise levels should be adjusted for special audio characteristics and/or the applicable adjustment factors must be discussed.

The EPA South Australia *Wind farms environmental noise guidelines 2021* (or the most recent revised version of that document) is to be used for assessing whether a wind farm can meet this design criteria, except where that guideline may be inconsistent with this policy.

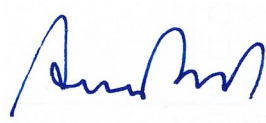
Noise Measurements

If approved, wind energy projects will contain conditions and restrictions to enforce the design criteria. The following guidance is provided for the interpretation of EPA Board wind energy project noise requirements:

1. It is generally acceptable for wind turbine noise to be measured in L_{A90} , but note that alternative techniques may be required (including measuring in L_{Aeq}) to better detect special audible characteristics (dominant and intrusive characteristics) and noise fluctuations or intermittent noise.
2. An appropriate conversion factor must be added to the measured L_{A90} level to derive the representative L_{Aeq} noise level. To be representative of L_{Aeq} , generally applying +2 dB(A) conversion factor to the measured L_{A90} level is acceptable.

3. Where special audible characteristics (dominant and intrusive characteristics) are detected from any wind farm noise, a correction factor must be applied in accordance with the *Tasmanian Noise Measurement Procedures Manual*.
4. The EPA South Australia *Wind farms environmental noise guidelines 2021* (or the most recent revised version of that document) is to be used for all wind farm noise measurements, except where that guideline may be inconsistent with this policy.

29 July 2025

A handwritten signature in blue ink, appearing to read 'Andrew Paul', written over a light blue rectangular background.

Andrew Paul
Chair
Environment Protection Authority Board