

NOTIFICATION OF SIGNIFICANT MATTERS OF CONCERN

To

EPURON PROJECTS PTY LTD**WESTERN PLAINS WIND FARM**

By

RESPECT STANLEY PENINSULA – NO WIND TURBINES INC (RSP-NWT)**September 2021****1. Introduction**

This written notification to Epuron documents the matters of significant concern to RSP-NWT and its members. RSP-NWT expects Epuron to consider these matters of significant concern to inform its impact assessment process for WESTERN PLAINS WIND FARM (WPWF), and in the design of WPWF, and in the draft Development Proposal & Environmental Management Plan (DPEMP) document to go on public display.

2. Background

Epuron has held a couple of “Information Days” and has asked for concerns to be identified so they can be considered in the DPEMP.

RSP-NWT have decided to document its concerns formally, based on its or its members’ concerns and those voiced by members of the public and from the public domain.

The following concerns are raised so proper assessments will be undertaken by Epuron and to assist the relevant Regulators and community in their understandings and deliberations. If properly addressed by Epuron, they may get some community support for an appropriate and appropriately sited renewable energy project.

3. Project Specific Guidelines requirements for Epuron

Epuron indicated that they intend to submit an DPEMP with the planning application to the Planning Authority (Circular Head Council) which means Epuron intends to submit a combined planning and environmental report. Epuron must address significant concerns raised by the community as public comment must form part of the DPEMP and planning process.

Project Specific Guidelines (PSG) have been provided by EPA to provide guidance to Epuron about what should be included in the assessment. Therefore, RSP-NWT refers Epuron to the EPA’s Project Specific Guidelines dated March 2018 for preparing a DPEMP for WESTERN PLAINS WIND FARM. In particular, RSP-NWT draws Epuron’s attention to the following sections and statements contained in the PSG:

- a) Risk Based Assessment: The DPEMP should be prepared using a risk-based approach.... The level of detail provided on each issue should be appropriate to the level of significance of that environmental issue to the proposal. “As well as the issues identified in the guidelines, other significant matters may emerge during preparation of the DPEMP from public comment or other sources, which will need to be factored into the DPEMP.”

- b) Key issues Epuron must assess include Potential impacts to threatened fauna, in particular avifauna species during operation. Potential impacts to threatened flora and ecological communities during construction. Potential noise impacts for nearby residents.
- c) The minimum survey requirements and studies required in relation to these key issues are provided in the relevant sections of these guidelines.
- d) The impact assessment must include worst case scenarios. RSP-NWT requires “The evaluation of potential impacts should identify plausible worst-case consequences.”
- e) The impact assessment should include best practice by other wind farms and updated practices for wind farms. The RSP-NWT state, “the information in the document should be as up to date as possible” and “industry best practice should be referred to where appropriate.”
- f) The impact assessment has a hierarchy for dealing with impacts - including avoidance, mitigation, adoption of alternatives and compensation as a last resort. RSP-NWT require “if the loss of community assets or amenities is considered unavoidable, measures to compensate for those losses should be proposed in proportion to the loss.” Epuron is to consider avoidance, mitigation and alternatives before offering compensation (e.g., to effected neighbours; offsetting flora or fauna impacts etc).

4. Notification of Significant Matters of Concern

Epuron are aware of the significant community concern over the project. To date there have been three protests staged - two in Stanley and one in Devonport outside the Energy conference. There will be more protests if Epuron continues with the project. There is a community meeting called by the community - to which Epuron has been invited to hear community concerns. There has been much media around the opposition to the windfarm including television news on ABC and Seven News, print media (again with numerous articles including 2 front pages) with the Advocate, Circular Head Chronicle and Mercury, news radio coverage with Tasmania talks, ABC drive, ABC Country Hour (name rest). Tasmanians are writing letters to the editors of their local papers. The President of the Stanley Chamber of Commerce has publicly called for a plebiscite, saying the community demand a say. Epuron cannot claim to have social licence or to have addressed the community's demand to be heard on this issue.

4.1 Visual, landscape, ridgeline and skyline concerns

Strong negative feedback about Western Plains Windfarm is evident in the community and was displayed at the Community Drop-in session on the 22nd June 2021. Epuron representatives advise the turbines will be visible from areas within Stanley, which is an item of significant community concern. The visibility from the major historic areas of the town, Highfield Historic site, the main street, Alexander Terrace and other areas within the township will be impacted. A greater concern is the impact on the visual landscape of the Nut from every direction. Community sense of place is not restricted to a few narrow streets within Stanley itself. The view of the Nut as you crest the hills on the Bass Highway from Rocky Cape and every view of the Nut on the way to Stanley from each direction will be impacted by the turbines of the WESTERN PLAINS WIND FARM. The views from 7-miles beach will impact the skyline in particular. The views from Smithton into Stanley and the views all along the coast. The cumulative impact of the WESTERN PLAINS WIND FARM, and other proposed wind farms at Port Latta and Robbins Island will be cumulative and of high negative visual impact.

The Nut State Reserve Management Plan 2003 was approved by His Excellency, the Governor-in-Council, on 14 April 2003 and took effect on 2 July 2003. This Management Plan for The Nut State Reserve has been prepared in accordance with the requirements of Part 3 of the National Parks and Reserves Management Act 2002. Sections 1 to 7 comprise the statutory management plan. The appendices are included to provide additional information necessary for effective implementation of the plan.

Unless otherwise specified, this plan adopts the interpretation of terms given in Section 3 of the National Parks and Reserves Management Act 2002.

The proposed WESTERN PLAINS WIND FARM is at direct odds with the Nut State Reserve Management Plan 2003 (The Plan). The Plan clearly articulates that the "Stanley Peninsula, the Green Hills, Highfield House, the village of Stanley and The Nut State Reserve combine to create a landscape of historic and cultural value. This landscape is the basis for the tourism industry in the district and an important part of any tourism strategy for north-west Tasmania. Maintenance of the appearance of this cultural landscape is important to the local community". The Plan further states "Although the natural landscape of The Nut State Reserve has been greatly altered since European settlement, it retains great aesthetic appeal as a landmark and symbol of the north-west coast. Its National Estate listing is due to its significance as the most prominent and dramatic landmark on the northern coast of Tasmania (Australian Heritage Commission 1981).

The Policy contained within the Plan states that "installations or buildings that impinge on the skyline of The Nut will not be permitted". The Actions in the Plan include "identifying and protecting significant cultural landscape view fields both from the reserve and viewing The Nut from a distance".

The proposed WESTERN PLAINS WIND FARM will tower over the Nut by approximately 20 metres as the turbines will be placed on a peninsula above sea level. They will impinge on the skyline of the Nut from many viewpoints, including from sea, which is not insignificant for fishermen and boat tours of the area. The WESTERN PLAINS WIND FARM will impinge on the skyline from 7-mile beach and coastal areas in the Smithton direction.

The WESTERN PLAINS WIND FARM will also impinge on view fields from the reserve, as people are walking or chair lifting up the Nut the turbines will be highly visible, also from several scenic viewing platforms on the Nut. This view fields take in the historic township of Stanley, the view of Highfield Historic Site and the green hills beyond. Turbines from the WESTERN PLAINS WIND FARM will be clearly visible from these view fields.

The WESTERN PLAINS WIND FARM will have a significant impact on viewing the Nut from a distance. The iconic landmark of the solitary Nut at the end of the peninsula will be marred by views of 12 turbines of the WESTERN PLAINS WIND FARM. The scenic views cape of the Nut will be marred from many areas where vistas of the Nut are seen and appreciated all around Circular Head.

The turbines will have a catastrophic and transformative negative visual impact because of the industrialisation of a historic pastoral and township environment and industrialising the peninsula and the iconic Nut. The DPEMP must protect all visually sensitive areas as a statutory requirement of the The Plan.

These visual impacts will also detrimentally affect the view fields to and from historic Highfield House, a National Trust Property that sits atop the Green Hills and affectionately known as the

Acropolis of Stanley. The current uninterrupted views of Highfield will be significantly affected, as will the pastoral and sea views from the site itself.

The historic Old Cable Station property is approximately 1 kilometre from the closest turbine. This accommodation and tourism venture trades on its historic significance and wide uninterrupted vistas.

There will be visual impacts from other significant historic buildings in Stanley including those along the main streets of Stanley.

The overall visual impact will industrialise and therefore change Stanley's natural beauty and vistas. Stanley will lose its historic visual appeal with this scale of industrialisation.

Landscape protection is required under the DPMP through landscape management that maps zones of landscape importance and integrates pastoral and cultural history, scenic quality, public concern, and seen areas from travel routes, recreational use and dwellings. The DPMP must demonstrate how it complies with The Plan.

4.2 Vibration concerns.

4.2.1 Vibrations & Human Health

Significant concerns exist about vibration. The character of vibrations produced by WESTERN PLAINS WIND FARM is not known, but significant vibration is expected to occur because of the twelve turbines with 150m height and the rotation diameter, construction of very large footings of unspecified depth in a poorly drained landscape. It is known that vibrations extend from

turbines. It is also known prolonged exposure to vibration can cause vascular, osteoarticular and nervous system problems. Disorders in functioning caused by vibrations are known to include increased motor reaction time, increased visual response time, disruption to coordination of movements, excessive fatigue, insomnia, irritability, and memory impairment. The actual effect from WESTERN PLAINS WIND FARM is not known for both the nature of vibrations that will be generated and also the susceptibility of neighbours and fauna to these vibrations. Therefore, the level and nature of vibrations at dwellings within and neighbouring WESTERN PLAINS WIND FARM must be assessed by Epuron; and use of damping systems on turbines is needed to mitigate vibration.

Stanley has a significant population and the impact of vibration could potentially impact its approximately 500 residents and the transient population of 100,000 who come to Stanley as tourists.

Has the impact of the model of turbine been assessed in relation to human health impacts for workers in close proximity to these turbines, on site and on neighbouring properties? These impacts need to be clearly understood to ensure appropriate OH&S standards are maintained.

There is a primary school located approximately four kilometres away from the WESTERN PLAINS WIND FARM, and children working and playing in this area. Many children also live in Stanley and surrounds, with the possibility of some living as close as the land host property and beyond. What impact of these turbines on children sleep patterns, behaviours and health has been assessed to gain an understanding of any potential health & behaviour impacts on children? Have the impacts on pre-existing health conditions been assessed and identified (e.g., autism, people prone to migraines, people with auditory sensitivities). The impacts need to be fully understood to reassure the community.

4.2.2 Vibrations / Noise and geographic & wider concerns

In addition to vibration & noise concerns for humans, there are concerns in relation to vibration and the impact of heavy construction. The project will involve twelve significant footings for turbines, which are going to be placed on a peninsula largely made of volcanic bedrock.

- a) Potential for the impact on bore water on neighbouring properties. Significant earth moving, drilling, possible use of explosives to clear bedrock may cause neighbours bores to collapse. This is significant as these farmers rely on these bores for their livelihood.
- b) Impact on the Nut. The Nut itself is the remnant of an extinct volcano and has large areas of basalt and declared landslip areas. These areas are adjacent to the Nut and the impact of any landslip, landslide, rocks or boulders tumbling from the Nut could be potentially catastrophic for the residents living below, for tourists and also those working at the Stanley Port. Studies must investigate both short term and longer-term stability.
- c) Potential impact on vibration on the Abalone Farm currently in operation almost adjacent to the WESTERN PLAINS WIND FARM. Detailed studies should be undertaken to assess the impact on the Abalone Farm operations and any potential financial losses
- d) In terms of the soil which will be dug out for the turbine footings, where will this end up? What quarry or site will be taking the soil and how will it be removed from site?
- e) What are the impacts on coastal creatures with the noise and vibrations of the wind farm? This area has a seal colony and frequently sees whales and dolphins. Will the vibrations and various levels of low and high frequency noise have a direct impact on these sea creatures. The peninsula is surrounded by sea on three sides, so will have an impact in terms of radiating sound frequency and vibrations into the ocean. Have studies been done to assess if there are whale beaching issues as a result of wind turbines on peninsulas?
- f) This is a fishing area, what studies have been done on the vibration and noise impacts on fish growth and hatching Will fish change their behaviour to avoid the area? This will impact both the fishing industry of Stanley but also other fauna that rely on the fish for survival including penguins, seals, dolphins and whales.
- g) What are the impacts of the turbines on reducing the quality of the soil on neighbouring properties due to additional wind drying out the landscape? Crops and animals are currently being farmed on these properties and the impact of the wind turbines needs to be understood both in relation to changing the micro climate and in relation to any distress that animals may suffer as a result of noise and vibration. Epuron should provide studies on the model turbine used and the impacts on farm animals, possible distress on animals and potential for lower yields both in terms of weight and breeding.
- h) Neighbouring properties also house and breed horses and these farmers are concerned about the impact of noise and vibration on the horses. Epuron should provide studies on the turbines to indicate what impact these will have on horses in close proximity, including foals in utero.

- i) Epuron also need to provide a detailed breakdown of the materials that are used in the construction of the motors, blades and turbines. Are any of these materials dangerous to human and animal health, and are any small particles released into the environment with the constant pressure and degradation of parts over time. If so, Epuron needs to provide modelling of how far the spread of these particles will be and the potential impacts on humans and animals. If cattle and crops are exposed to these particles, are they a danger to human consumption? How will this impact on the Cape Grim Beef certification that a number of Stanley farmers have worked very hard to acquire.
- j) The Nut is used by people to launch ultra-light aircraft, which fly around Stanley. What is the impact of the WESTERN PLAINS WIND FARM on the recreation and enjoyment of people to use their ultra-lights in this area?
- k) Adjacent properties have valuable sheep flock. What will be the impact of construction on the health of these sheep? RSP-NWT is aware of A. Gardner whose sheep produced award-winning ultra-fine wool sued AGL for \$2.3 million for negligence, accusing it of destroying their business after more than half their flock died amid construction of a wind farm next door. They allege dust emissions caused by construction of the wind farm were "noxious" and "caused a material injury to the sheep". What will be the impact of construction of WESTERN PLAINS WEIND FARM on the sheep property adjacent?

Epuron must ensure a duty of care to the neighbours and the Stanley community to ensure that the Western Plains Project does not have any negative impact with vibration and construction. Detailed geo-surveys must be undertaken to assess the risk of bore collapse, landslip and boulder fall, and detail the type and method of the construction and vibration so that these risks are zero. It is not acceptable to have a large construction project which will have risk to the community.

4.3 Noise concerns

Concerns about noise exist and the DPMP must address the following issues:

- a) Recognise the entire Stanley Peninsula as an area of concern
- b) Recognise the entire Stanley Peninsula as high amenity noise areas under NZ Standard NZS 6808:2010 Acoustics – wind farm noise.
- c) Make underlying data and noise modelling available for peer review as part of the draft DPMP
- d) Ensure noise emissions from WESTERN PLAINS WIND FARM do not exceed the levels allowed for the residential zoning of Stanley
- e) Investigate and document noise generated from different turbine configurations – different turbine height, different turbine design and capacity, and different spacing - for inclusion in wind farm design.
- f) research and document the effect of infrasound on the health of residents and neighbours of WESTERN PLAINS WIND FARM.
- g) Outline technical options using masts at key dwelling and neighbouring settlements to turn off turbines when noise levels are exceeded at the locations.

Noise pollution created by windfarms is increasingly well-understood. In the recent Victorian appeals case of *Bald Hills Wind Farm P/L v South Gippsland Shire Council* (2020), the Defendants were successful in upholding a decision to have a wind farm declared a statutory nuisance, given the noise impacts from more than 2km away.

There are residents and tourism operations within that zone. With turbines akin to large tuning forks and taking into account the unique topography of Stanley – particularly with the, sound traveling towards the village and then bouncing back against the Nut, what measures will Epuron put in place to ensure that the noise impacts do not cause a statutory nuisance.

It is well known by residents of Stanley that sound echoes off the Nut, with some noises sounding louder the closer you move to the Nut as the noise is bouncing back off the Nut. Epuron must also identify the specific characteristics of the Nut formation and the potential impact of echo and reverberation of sound off the Nut, and how will this will impact on residents.

4.4 Sensitive use of adjacent land & impact on residents and tourism & heritage

A number of sensitive areas adjacent to WESTERN PLAINS WIND FARM exist. Stanley is a unique community based on the lifestyle of relaxation and recreation in a remote landscape free of large-scale industrial developments and sitting in a sense of history, surrounded by spectacular scenery. Stanley is a sensitive historic area giving insight into life in early 1800s and is a declared historic township. Epuron must ensure there is no nuisance from the wind farm and that the project does not deter visitation to Stanley or devalue the amenity of residents.

Stanley won the Top Tasmanian Tourist Town 2021 and this was largely based on the concept of escaping from built up urban environment and industry. The placing of 12 turbines on this peninsula is at complete odds with the basis for tourism in this region. The Plan of the Nut reserve clearly demonstrates that the peninsula as a whole is an important element for tourism in the region.

The WESTERN PLAINS WIND FARM would comprise 12 wind turbines located approximately 3km from the town boundary of Stanley and 4km from the base of the Nut. This would make Stanley the closest township to a wind farm in Tasmania and inhibit its growth to the west. This is of particular concern for tourism development on the peninsula, where the western region of the peninsula is under consideration by several investor groups. Epuron must prepare detailed information in relation to the potential impact of the windfarm for developer groups so that the full extent of any noise, visual and other nuisance issues are understood, and must explore the market place to provide detail of potential investment in Stanley which will be negatively impacted by their proposal.

The distance of the WESTERN PLAINS WIND FARM from Stanley is at odds with recommendations by the Australian Energy Infrastructure Commissioner, who provides: “Consideration should be given to setback distances between a wind farm and a materially populated township or city boundary. A distance of 5km may be appropriate to preserve amenity and provide some flexibility for planning growth of the township.”² If this recommendation is true of ‘materially populated townships’ generally, then the risk is certainly greater for the tourism-reliant township of Stanley, which draws a transient population of 100 thousand visitors each year.

Epuron must prepare detailed plans outlining how the future growth of the township would be impacted by the placement of a wind farm 3km from the town boundary as identified on the List Maps. By effectively roadblocking the township from growth Epuron is in effect dictating where future growth and opportunities for subdivision may or may not occur. Epuron must quantify the

loss to landholders who would lose this opportunity to subdivide their property and also quantify the loss to the community of Stanley in hemming in their growing township. With two sub division proposals currently in the pipeline this demonstrates confidence in the township and the opportunity for growth, which has the potential to be hemmed in by Epuron's proposal. How can this loss be compensated for?

The Tasmanian Government identified Tasmania's Far North-West as a tourism-dependant region in need of investment into visitor infrastructure. To that end, they commissioned the Reimagining the Far North West report and have recently granted a further \$275,000 to a tourism gaps analysis for the region. The Epuron proposal will further devalue tourism for the Stanley Peninsula as it is at direct odds with the 'brand' of the Stanley peninsula. How can tourism operators be compensated for their losses if tourists eschew Stanley? Studies show that windfarms damage tourism, particularly in visually beautiful coastal areas. Have windfarms been built in other historic tourist coastal towns in Australia – whose core business is tourism and related activities?

Stanley's visual appeal has rendered it a drawcard for film and television producers around the world. It has featured in many advertising campaigns, provided the set for Hollywood film *The Light Between Oceans* in 2016 and is currently under consideration for at least one other significant film project. The introduction of industrial turbines to this landscape, will at the very least, hamper its visual aspect and heritage appeal.

Historic Highfield Site is often used for functions, wedding and events which capitalise on its unique heritage appeal and charm. The opportunity for wedding photographs and events in this historic site will be marred by the presence of turbines visual from many aspects of the historic site. This will not only reduce the appeal of the property from a commercial aspect, but may also reduce visitation to the site and change the vista and visual enjoyment of the property by introducing a modern and industrial aspect to the landscape. What impacts on this have been assessed and measured by Epuron?

Epuron will need to provide detailed information on any new roads that they plan to build across the Greenhills in Stanley. How will these be remediated to avoid 'scarring' the landscape?

The Stanley Chamber of Commerce is currently pursuing further grant funding to continue its work converting Stanley's telegraph poles to subterranean infrastructure, to preserve the township's heritage appeal. This pursuit will be virtually redundant, should the Development proceed. Can Epuron quantify the loss to the community in destroying the heritage landscape?

Epuron's DPEMP must ensure the Stanley brand is not compromised, no turbines should be installed on the Stanley Peninsula and Epuron should investigate alternate areas for the wind farm in the DPEMP - such as the West Coast of Tasmania, so tourism values are not compromised, or consider installing a solar farm.

Real Estate prices are widely known to be impacted by proximity to a windfarm, having greater negative impact the closer a property is situated to a windfarm. Setting aside falsely inflated prices of windfarm developers purchasing neighbouring properties, Epuron must quantify the impact on residential and commercial real estate process, using genuine before and after examples in situations where windfarms have been placed close to materially populated townships and coastal tourist towns. What are these negative impacts and the flow on effect for community? The case of Baldhills windfarm versus Zakula in Victoria appears to demonstrate that valuation of property close

to windfarms diminishes due to 'nuisance'. Epuron will need to provide detailed evaluations of properties in close proximity in order to establish potential valuation losses should a wind farm proceed.

4.5 Community Trust & Social License

Epuron does not build or operate wind farms. Instead, they obtain planning rights to build wind farms and trade those rights to third parties. In the case of Rye Park in NSW, Epuron obtained development application (DA) approval for 157m high turbines in 2017. When these rights were on-sold, the DA was amended in April 2021 to approve a new turbine height of 200m. This erodes confidence in the reliability of the wind turbine heights under the Development. Indeed, five out of the seven windfarms that Epuron have on sold have resulted in fewer turbines of greater height.

Epuron is trying to build community trust and engagement to gain the concept of 'social license' for the WESTERN PLAINS WIND FARM. When asked at the community drop-in session how many of Epuron's projects had been subject to Development Application (DA) Amendments, Epuron were not able to advise the detail. RSP – NWT request that Epuron have full transparency with the community of Stanley and outline the wind farm DA projects that Epuron has sold throughout Australia and also outline what DA amendments have subsequently been made by purchasers of those projects.

The community needs to trust that the project that Epuron get the DA approval for will in fact be the project that is developed. The Community does not have this trust.

4.6 Shadow flicker and blade glint concerns

Shadows caused by the presence of turbine towers (for example cast across roads) and shadow flicker caused by blades are concerns to be addressed by Epuron. Shadow flicker can trigger epileptic seizures and be a source of annoyance that leads to health issues. Modelling is normally conducted for sensitive areas next to wind farms but RSP-NWT has not seen any validation of models used in wind farm assessments. International best practice adopted in Netherlands requires turbines to be equipped with automatic shadow flicker control systems if shadow flicker occurs at sensitive receptors within 12 times the rotor diameter (2.2km) and if on average shadow flicker occurs for more than 17 days per year for more than 20 minutes per day. In regard to flicker frequency, Epuron must make available the turbine manufacturers technical specifications to show the maximum shadow. When adopting worst case scenario, modelling should assume a 3km default distance, 15% sun coverage, and 2 degrees or more sun angle.

Glint may be visible from a large part of Stanley and surrounds, particularly when the sun is low or setting. What glint reflections will occur on the Nut? Epuron should prepare a report outlining the times that glint will occur in each season, and which areas will be impacted. Will this be visible from roads and cause a hazard for drivers? The WESTERN PLAINS WIND FARM will be highly visible from the Bass Highway which is the main arterial route to Smithton and beyond and the impact of glint needs to be fully explored in relation to any driving hazards which may occur for all roads which may be directly impacted. The glint may also affect air traffic, particularly that to and from King Island. A report should also address this risk.

4.7 Electromagnetic radiation, electrical and communication concerns

Electromagnetic and physical obstruction from turbines could interfere with radio communications and emergency services. The Stanley area requires proper communication systems for boating safety, for emergencies, for phone communication, for business, and for enjoyment. Ghosting of TV receivers may occur when turbine blades scatter the signal. Problems can be eliminated by minimising the use of metal in turbines (such as in blades and the lightning protection system). The turbine electromagnetic interference which comes from the generator can be suppressed by shielding design.

An Electromagnetic Interference Assessment is required for 60km around WESTERN PLAINS WIND FARM so that there is no impact on residences and emergency services; and must consider as a minimum the following:

- a) Fixed point-to-point radio systems.
- b) Digital Television Broadcast as there are areas of low signal.
- c) Aircraft Telecommunications Systems (including aircraft being obscured from radar detection).
- d) Maritime Radio Systems (particularly with the levels of recreational use of lakes).
- e) Meteorological Radar such as BOM for “Windfinding” and “Weather Watch”).
- f) AM/FM Radio Broadcast.
- g) Cellular Mobile Phone Systems.

As well as residents, a large number of tourism businesses utilise TV reception in their premises. The number and impact of problems with reception as a result of the WESTERN PLAINS WIND FARM will need to be measured, identified and assessed. How far away from the WESTERN PLAINS WIND FARM will the impact to TV reception be felt?

An increase in Transmission Line electromagnetic effects should also be considered because of the new connections that are planned and used by Epuron. This effect on human and animal health must also be assessed in the DPEMP. Epuron must address these concerns in the DPEMP and adopt both technology and turbine location so electromagnetic interference and health impacts do not occur in the area.

4.8 Social considerations

Epuron must provide accurate, honest, and complete socio-economic assessments. Claims have been made by Epuron about jobs created, increase in land values, and local benefits from a community fund but they have been quiet about social problems.

Epuron must address issues raised by the community— e.g., choice of WESTERN PLAINS WIND FARM site was because of wind (not with social and environmental considerations); lot of negatives (nothing in it for Tasmania or locals); tourists come for unique heritage and beauty experience not turbines.

We understand that residents around the Cattle Hill Wind Farm have advised Epuron that wind farms are not socially good and ‘destroyed Miena way of life’; ‘locals leave the community and not return’; ‘few locals get jobs; and concern about foreign ownership.

As well as these community concerns, RSP-NWT raises significant matters about:

- a) Accurate construction employment figures. A review of predicted employment numbers compared with actual employment is required in the DPEMP using information from other

wind farms in Australia. The average jobs per MWH for recent new wind farms of similar size averages 0.6 but Epuron claim of 1.0 is almost double.²⁴ Less than 150 construction jobs are likely and most will be non-Tasmanian and of short duration. If Epuron claim that jobs will be available for locals, is there market research confirming those skills exist locally? If not, will the jobs really be filled by fly in fly out workers?

- b) New full time operational and maintenance employment. Epuron has publicly said 2 full time jobs would be created Specific jobs that will be created need to be identified by Epuron, including whether the requisite skills exist locally.
- c) Number of construction jobs to be filled by local, other Tasmanians, Mainlanders, and international workers need to be identified and verified by another Tasmanian experience (e.g., Cattle Hill Wind Farm experience).
- d) Number properties predicted to be bought that are adjacent to the wind farm for post construction workers need to be stated as it is used by Epuron to justify their view property prices will increase; and verified by another Tasmanian experience (e.g., Cattle Hill Wind Farm experience). Epuron should identify where the properties they propose to purchase are situated – do they really exist?
- e) An estimate of the total capital cost of the project, the amount expended overseas, the amount expended on the mainland, the amount expended in Tasmania, and the amount expended locally is needed.
- f) An estimate of the impact and delays to locals and visitors on the road widening and transport aspects of the construction. How will this impact on emergency services as there is only one way in and out of Stanley Peninsula? How will this impact on ports traffic as the gateway to King Island and the Port? If residents cannot get out to go to work, what is the impact on individuals and Circular Head businesses? What will the economic impact be on tourism and other Stanley businesses? A report must be available so residents understand the costs to them and the community.

An overview of research on the impacts and volume of residents leaving a materially populated area and the impact on community when this occurs needs to be prepared by Epuron so that community understands the risk to the fabric of the community connections which will be harmed.

4.9 Fire concerns

WESTERN PLAINS WIND FARM and its associated processes increase the risk of fire within the wind farm area because turbines cause fires, turbines that are 150m high act as 'Roman Candles' and spread fire, turbines on Western Plains will hinder aerial firefighting, and the fact that Stanley only has a small volunteer fire service to tackle any potential fire is of concern.

AFAC policy document 25 provides guidance for authorities and individuals to develop a local fire prevention and control plan for a wind farm. It was developed using a Waterloo Wind Farm case study with turbines only 140m high. Use of this policy document by Epuron does not derogate Epuron from their statutory obligations to ensure protection of adjacent dwellings because of their activity – a Fire Protection Plan for the wider area is needed. The AFAC document requires "individuals, agencies, organisations and public bodies make their own enquiries as to the currency of this document and its suitability to their own particular circumstances prior to its use" and "it also provides guidance for AFAC member agencies, wind farm developers, wind farm operators and other stakeholders in planning for bushfire prevention, preparedness, response and recovery activities in and around existing and planned wind farm facilities".

Epuron must:

- a) Document all the known turbine fire from wind generators in Australia and the effect of the fire (such as area burned, stock losses etc.) in the DPEMP. RSP-NWT know of at least 6 fires started on wind farms in Australia.
- b) Ensure access to fire water within WESTERN PLAINS WIND FARM and protection of neighbours' assets are not compromised by the presence of turbines.
- c) Ensure Fire Prevention and Protection Plans are developed as part of the DPEMP rather than after any approval occurs as intended in the AFAC guidelines for 'planned windfarms' because it is part of proper wind farm design.
- d) Use the AFAC guidelines to help develop a 'Protection Plan for Settlements and Dwellings Adjacent to WESTERN PLAINS WIND FARM' in association with neighbours.
- e) Develop a 'WESTERN PLAINS WIND FARM and Surrounding Forest Fire Protection Plan' (including Epuron doing fuel reduction burning).
- f) Identify what additional resources Epuron will make available so that there is capacity to implement all fires plans including employing firefighting personnel.
- g) Make sure community and emergency service communication capabilities are not impacted by WESTERN PLAINS WIND FARM.

4.10 Setbacks

Setbacks need to adopt not only current best practice but also the technical requirements of the turbine manufacturer. Plausible worst-case scenarios as required under the PSG must be applied. Turbine blades are known to disintegrate and throw debris long distances. It is not acceptable for Epuron to burden others with safety and physical damage outside the wind farm boundary or on high value utilities and high conservation value features within the wind farm area.

For the above reasons, the DPEMP must:

- a) Adopt current best practice setback distances.
- b) Disclose the blade material throw and safely distances specified by the manufacturer
- c) Identify and establish an appropriate km distance spacing between towers (with appropriate safety/throw zone from each turbine).
- d) Use at least 3km setbacks of turbines from settlements being best current practice.²⁷
- e) At least 2km setbacks of turbines from isolated dwellings being best current practice.²⁸
- f) At least 3km setback distances from Wedge-tailed eagle nests as a default requirement while GPS tracking of local eagles and expert advice is finalised.
- g) Setbacks from water bodies to allow aerial access to water for firefighting as specified in the WESTERN PLAINS WIND FARM Fire Protection Plan.

4.11 Cumulative impacts

PSG require the cumulative impacts of existing and approved projects to be assessed and for other proposals which have been formally proposed and for which there is sufficient information to allow meaningful assessment (with uncertainties identified). Epuron are also required to consider other significant matters from public comment or other sources.

Furthermore, the Government has announced Battery of the Nation, a 100% increase in the Renewable Energy Target for Tasmania, with the need for new wind farms and the introduction of Major Project legislation to allow projects such as wind farms to easily gain approval. Therefore, WESTERN PLAINS WIND FARM must include current, proposed, and identified potential wind farms

as part of the cumulative impact assessment and as part of the plausible and publicly identified scenario as required in PSG.

RSP-NWT concerns about cumulative impacts include but are not limited to:

- a) Cumulative impacts on local social values of WESTERN PLAINS WIND FARM, Port Latta Wind Farm, Robbins Island wind farm and on landscape, skyline, 'cradle to the grave CO2 production', property values, infrasound, road maintenance, and Stanley heritage and tourism values.
- b) Cumulative impacts on local populations of threatened and endangered flora and fauna by WESTERN PLAINS WIND FARM, Port Latta Wind Farm, Robbins Island wind farm. This includes national and state threatened and endangered flora and fauna and in particular Wedge-tailed eagles, White-bellied sea-eagles, Tasmanian masked owl, Tasmanian devil, Spotted-tailed quoll, invertebrates and flora.
- c) Furthermore, Epuron must consider the cumulative impact of approvals to use of Identiflight as applied for CHWF. RSP-NWT understand CHWF is allowed to kill two (2) eagles; after that turbine shutdown will occur if the system detects eagles but is capped at 1% loss of total power production; and once the cap is reached, killing of eagles can restart again with offsets. The cumulative impact of both WESTERN PLAINS WIND FARM and CHWF under Identiflight must be considered because a killing 'sink' will impact on the local and state population. Cumulative impact of unending killing of local Wedge-tailed eagles by CHWF and WESTERN PLAINS WIND FARM must be assessed.
- d) Cumulative state-wide impact of WESTERN PLAINS WIND FARM, other existing wind farms and planned wind farms (undergoing assessments) need to be assessed for the above values.
- e) The cumulative impact of WESTERN PLAINS WIND FARM, CHWF, AEMO identified areas, and Epuron self-disclosed intentions need to be assessed for cumulative impacts on flora, fauna, visual, and skyline values.
- f) Cumulative impact of WESTERN PLAINS WIND FARM and the 2019 wildfire on flora and fauna which has already put local populations under stress.

The cumulative effect of off-sets also needs to be addressed particularly for Wedge-tailed eagles and White-bellied sea-eagles give the CHWF approval and intentions for WESTERN PLAINS WIND FARM. Rather than using off-sets to allow a project to proceed at the cost of the local environment, real protection in the local area is required by changing Wind Farm design as a priority.

4.12 Tasmanian Wedge-tailed eagles.

A number of concerns for Wedge-tailed eagles (WTE) are outlined below so they can be addressed by Epuron in their impact assessment.

Population sink impacts. WTE occur as a single population in Tasmania and WESTERN PLAINS WIND FARM will kill birds, reduce breeding success (because of the presence of 150m high towers), reduce food source (by carcass removal), and create a population sink creating further deaths. Therefore, the impact of the wind farm on the local WTE population will have flow on effects for its wider population. This is exacerbated by the Regulator through Permit conditions, authorising killing of WTE, using offsets for nests that are already protected, limiting turbine downtime (capping) to avoid collisions; and taking actions contrary to the Tasmanian Eagle Recovery Plan requiring an increase in the number and density of WTE populations.

Buffer protection of nests. WESTERN PLAINS WIND FARM will disrupt breeding. Some known nest sites have turbines located on their "door-step" and access to nests will be impeded. A 1km/500m buffer does not protect nests from turbines which are 150m high. (The height of the tower and its operation will result in line-of-sight impacts; heightened noise, shadow flicker and glint; electromagnetic radiation and infrasound. The impact on WTE nesting behaviour and breeding is not known. Infrasound and electromagnetic radiation impact on nesting must be researched since it affects humans and the effect on raptors and nesting needs to be known. The 1km buffer has no rational basis to protect eagles from 150m high turbines as it was developed for ground operations in forestry. Buffers need to be placed on new nests built after Regulatory approval and approval for operation of these turbines rescinded. Other countries' study of nesting eagles use GPS to see where activity concentrations drop off away from nests - the USA routinely specifies 16km based on such evidence and South Africa is looking at about 8km.

Therefore, Epuron's DEMP must investigate the impact of 150m towers and the associated line of sight, noise, shadow flicker and glint, electromagnetic radiation, and infrasound on WTE nesting behaviour and breeding; adopt new buffer distances to protect known and new nests sites; measure buffer distances from the blade tip (not the tower) since blades will be 90m in length; and document best practice adopted overseas to protect endangered eagles.

GPS tracking of local WTE and best practice eagle utilisation surveys. RSP-NWT is concerned about the use of ground-based eagle surveys of local eagles by Epuron (with many sources of error) when GPS technology is available to be fitted to local eagles to gain accurate measures of bird use and survivability in the WESTERN PLAINS WIND FARM area. Epuron need to implement GPS tracking as best practice of resident eagles within the project area to accurately measure landscape use, as "highly recommended" they investigate in Ground surveys are only estimates of eagle flight routes made by people with maps and pens over a very short period of survey time. They are surveys of unknown precision and therefore are unreliable and highly susceptible to human error. Observers looking for eagles around the site and writing down subjectively their opinion - where they believe the eagles are and how high they might be flying - have many sources of errors including mis-identification at a distance, the number of birds being seen; is not an objective measure or true pattern as eagles are curious and shadow people to see what prey may be flushed out; has observer influences; and can involve double counting. Direct observations are guesstimates.

Tasmanian Wedge-tailed eagle, Western Plains

Nest monitoring needs to be adopted by Epuron. Early, mid, and late-season monitoring is required so early failures and late-season failures are known, and productivity is not overestimated. Assessments should be done from the air as ground judgements are unreliable.

Prevention of collisions and Identiflight. Empirical evidence of the usefulness of camera/radar systems such as Identiflight to avoid eagle collisions and deaths is required and should not be assumed when designing the wind farm layout. This includes proof in recognising flying eagles (including false negatives) as well as proof that this recognition technology results in reduced deaths and collisions since blade tips operate at over 300kph. Collision and shutdown rules need to be outlined in the DPEMP. It is not acceptable to adopt management practices which "cap" the number of stoppages because of eagle sightings (such as 1% of the total operating hours of a wind farm) and then authorise additional killing of WTE by using offsets at distant locations as the rationale.

Proper monitoring of bird mortalities from turbine collisions is required. Searching 'below' a turbine does not account for all the hits as some birds will go off-site. Use of tracker dogs over larger areas

needs to be adopted in the DPEMP to increase detectability of dead and injured birds and for accurate impact assessments and subsequent management actions. Monitoring of mortalities must be independent of the Epuron and be paid for by the company. It is clearly in the operator's interest to find few dead or dying eagles. GPS tracking of birds will allow birds to be followed offsite.

Killing of prey and carcass management. The area around Western Plains has a population of eagles in the landscape, prey species are in abundance, territories may be quite small, and potential exists for many nests. Eagles cruise and prey on the broad Plains area and source carrion from roadkill, and wallaby shooting as a frequent component of their diet. A change in prey management is a threatening process to the local WTE population. Mass culling of wallabies and carcass removal aimed at minimising WTE collisions, will significantly reduce available prey and effect site utilisation by eagles. Dumping of carcasses at a few sites within Western Plains area will also change site utilisation practices by WTEs. Removal of all carcasses from within Western Plains by Epuron is not guaranteed and exposes eagles to collisions in turbine swathe areas. Shooting within Western Plains and on neighbouring land will occur and has a non-death rate of about 30% (pers.com.). Some will die in the turbine area. Not all carcasses will be located and not all carcasses will be removed as soon as the animal dies.

Habitat protection. New nest sites, historical nest sites in or close to the Western Plains area, and critical habitat within WESTERN PLAINS WIND FARM area all require formal protection mechanisms such as covenants on Land Titles and Ministerial Protection of Critical Habitat. The DPEMP needs to outline long-term protection mechanisms of these elements including an appropriate buffer.

Collision Risk Modelling. Collision Risk Modelling (CRM) is needed to lower effects of WESTERN PLAINS WIND FARM on the WTE. CRM is not a substitute for use of buffers to protect the WTE against direct impacts of the WESTERN PLAINS WIND FARM. GPS tracking of local eagles as part of Eagle Utilisation Studies will help reduce margins of error and help with precision. GPS tracking of local eagles, highly recommended in PSG, must be integrated by Epuron into collision risk modelling and included in the proposal to be submitted to EPA prior to work being carried out on site utilisation and collision risk analysis. CRM should also include changes to eagle utilisation patterns because of changed carcass management practices. Five (5) days study in the middle of each season is inadequate to inform CRM and is markedly influenced by the timing, location and scale of mass culling of wallabies on land within and near WESTERN PLAINS WIND FARM.

Cumulative impact on WTE. Eagles are territorial and part of one population in Tasmania. An elevated death rate caused by WESTERN PLAINS WIND FARM will create instability - with shuffling of territorial boundaries and disruption to breeding and a risk of creating a population sink. Spaces made by turbines killing WTE will draw in those from nearby areas and with the process continuing relentlessly. The cumulative impact of the proposed Robbins Island Wind Farm on Western Plains Wedge-tailed eagles and the cumulative impact of Western Plains Wedge-tailed eagles on Robbins Island needs to be considered. Wide area monitoring adopted under the CHWF Approval needs to be considered. The cumulative impact of carcass removal practices on the local Stanley eagle population and the associated negative impacts on local Tasmanian devil populations must be considered since Devil prey will also be removed.

Increase in number and density of active WTE territories. The objective of the Tasmanian Eagle Recovery Plan 15 is to increase the population size and stability of WTE and the number and/or density of active territories. The DPEMP for WESTERN PLAINS WIND FARM needs to demonstrate how WESTERN PLAINS WIND FARM will increase the population size and stability of WTE, increase breeding success, and increase the number and/or density of active territories. RSP-NST is concerned

180m high turbines and wind farm practices used by Epuron will do the opposite - decrease the size of an important and endangered population, reduce the density of the species in the local area, change the quality of the habitat, and disrupt the breeding cycle of the local population. Local WTE population viability, genetic diversity and resilience to climate change require investigation as part of the DPEMP.

Offsets. Offsets are measures that compensate for the effect of WESTERN PLAINS WIND FARM on matters of national environmental significance where a net improvement or maintenance of WTE viability occurs. They are based on what is killed or what is modelled to be killed. Offsets are not applicable for the WESTERN PLAINS WIND FARM eagle population as offsets will not increase the density of the territory as required under Tasmanian Eagle Recovery Plan, no off-set areas are locally available. Money for eagle research and used as an offset does not assist the local WESTERN PLAINS WIND FARM population. Offsets will have a net negative effect because habitat cannot be improved in another area to compensate for degradation in WESTERN PLAINS WIND FARM area.

4.13 White-bellied sea-eagles.

White-bellied Sea-eagle (WBSE) has a more restricted distribution than WTE. There are few nests and few individuals in the WESTERN PLAINS WIND FARM area and surrounding areas. Surveys for WBSE nests need to occur. Targeted WBSE utilisation surveys and Collision Risk Modelling and analysis is required. Collision management in the DPEMP must ensure no deaths of local WBSE occur. Off-sets are not to be applied because of the few individuals in the local population, lack of locally available offsets, and the cumulative impact of Port Latta and Robbins Island Wind Farm. Protection of nests by buffers of at least the 'throw' distance of a 150m turbine is required.

4.14 Tasmanian masked owl.

Tasmanian masked owl (TMO) is listed as endangered under the Tasmanian Threatened Species Protection Act 1995 and protection of individuals and local populations is required to support recovery of the subspecies. Population estimates for breeding individuals needs to be confirmed around the WESTERN PLAINS WIND FARM area. TMO are nocturnal predators and feed predominately on sites like WESTERN PLAINS WIND FARM with introduced rodents and rabbits on agricultural land, as well as arboreal marsupials, terrestrial mammals and native birds in less disturbed habitats. Nesting occurs in large tree hollows of living or dead trees, but sometimes in vertical spouts or limbs. Low population densities and their cryptic behaviour make this species difficult to detect. TMO calls can be used to elicit a response, but the chance of an owl being nearby and responding is low. Use of specially trained dogs to search for TMO's strongly smelling pellets is required and will indicate roosting or nesting habitat. The threats to the subspecies include loss of nesting habitat, secondary poisoning, collision mortality, and competition for tree hollows all of which apply to WESTERN PLAINS WIND FARM. Survey work is required by Epuron to identify population density and nest sites using trained tracker dogs, so nest protection strategies can be applied and because hollow searches are unreliable. TMO is susceptible to secondary poisoning (and in particular 1080) and Epuron should ensure it is not used for pest control on WESTERN PLAINS WIND FARM land. Investigations on behaviour and collision avoidance for TMO are required so collision mortality can be avoided. The subspecies' habit of frequenting forest and woodland edges, as well as cleared land and paddocks puts the subspecies at greater risk of collisions with artificial structures. Turbines in higher risk areas should be avoided.

4.15 Birds

The Nut reserve is used by migratory birds. Several colonies of the short-tailed shearwater *Puffinus tenuirostris*, also known as the Tasmanian muttonbird, occur on the seaward sides of the summit. In 1994, a survey located over 13,000 burrows in the reserve. The Nut is also important as a first landing and staging point for several species, including the endangered orange-bellied parrot *Neophema chrysogaster* during its migration from Victoria to Tasmania to breed in the south-west of the State. Other species known to stop at The Nut include the blue-winged parrot *Neophema chrysostoma*, the grey fantail *Rhipidura fuliginosa albiscapa*, the silvereve *Zosterops lateralis lateralis*, the marsh harrier *Circus aeruginosus gouldi* (which is known to nest on The Nut), the Horsfields bronze-cuckoo *Chrysococcyx basalis* and the shining bronze-cuckoo *Chrysococcyx lucidus plagosus*. The only Tasmanian sighting of a black-eared cuckoo *Chrysococcyx osculans* was recorded at The Nut

The Australian kestrel *Falco cenchroides cenchroides* has traditionally bred on the westward face of The Nut under the Stanley lookout, one or two pairs of only ten or so pairs on mainland Tasmania. The peregrine falcon *Falco peregrinus macropus* also breeds on The Nut on the northern and eastern cliffs, an area not traditionally used by recreational climbers.

Little penguins *Eudyptula minor*, also known as fairy penguins, nest on the lower scree slopes on the seaward side of the reserve. They are highly vulnerable to attack by cats and dogs, particularly when coming ashore or going to sea from their burrows. They are reasonably safe once they are in their burrows.

Has Epuron studied the impact of the WESTERN PLAINS WIND FARM on these species to ensure there are no negative impacts?

4.16 Bats

There are eight species of bats occurring in Tasmania and the Tasmanian long-eared bat is the only endemic bat species. Bats occur on site but the species and density of bats present in WESTERN PLAINS WIND FARM area is not known. All Tasmanian bats are fully protected species and it is illegal to collect or harm them. Collisions with turbines kill bats and sound from turbines bursts ear drums. Since bats will be 'taken' and will require a permit, the nature of the local population needs to be understood. Bat surveys need to be undertaken, an assessment of sound including infrasound on bat health be made; and a Collision Management Strategy for Bats be adopted after peer review so as to minimize deaths. The impacts of WESTERN PLAINS WIND FARM on bats, mitigation strategies to be undertaken, and mortality monitoring and reporting procedures need to be clearly outlined in the DPEMP.

The Plan for the Nut reserve outlines the species that inhabit the Nut in particular and assessments must be undertaken by Epuron to identify if any of these species utilise the WESTERN PLAINS WIND FARM area.

4.17 Technical and data matters

RSP-NWT are concerned technical and data matters be provided in a transparent manner in the DPEMP to allow peer and independent review and verification by experts and the community. As indicated earlier, Epuron must make available technical information from the turbine manufacturer about safety/throw zones as well as tip speed, shutdown time, and ice-lightning-noise damping features to be installed. Data and modelling used for Collision Risk Modelling, Noise Modelling, as well as disclosure of noise monitoring sites must also be made available for review. Assumptions behind the modelling need to be provided; as well as the result of the process required under the

PSG for EPA 'approval' of Collision Risk Modelling analysis 29 prior to any eagle utilisation survey work being carried out.

RSP-NWT are also concerned Wind Farm Design is based on Epuron's knowledge and experience but the Project is a 'black box' as far as demonstrating all technologies and alternatives have been considered and best available components are used in the best available way. Furthermore, the Project design (e.g., turbine spacing, heights, and reasons for the chosen turbine locations) need to be transparently presented in the DPEMP.

RSP-NWT are concerned about the turbines containing sulfur hexafluoride (SF6), which is often used to reduce the risk of short circuits in wind turbines. Since an SF6 molecule is a strong greenhouse gas it causes as much greenhouse effect as 23,500 kilos of CO2 and remains active for thousands of years. Can Epuron confirm if the turbines which will be used in the WESTERN PLAINS WIND FARM contain SF6, and if so, can they confirm that they will never be released for the life of the windfarm?

Therefore, the following is needed as part of the DPEMP:

- a) An 'Independent Technical Review of WESTERN PLAINS WIND FARM Wind Farm Components' used by Epuron.
- b) An 'Independent Technical Review of Data and use of Data in Wind Farm Design.' and
- c) An 'Independent Report on Options for Components and Wind Farm Design for Best Environmental Outcome' as a result of the Technical Reviews adopted above.

In summary, the components used by Epuron and the wind farm design adopted by Epuron all have significant consequences for the Stanley environment and need to be assessed.

4.18 Wind Direction

The prevailing wind patterns will have a large impact on the noise and nuisance issues which will arise as a result of the WESTERN PLAINS WIND FARM. As well as releasing the Epuron obtained wind information a comparative study of wind patterns as measured by Government wind surveillance at nearby measuring stations needs to be provided. Members of the community do not understand how Epuron's claims in relation to wind direction correlate to those obtained from other wind measurement sources, or their own experiences having lived in the area for decades.

4.19 Use of Current Best Practice and Information.

RSP-NWT are concerned Epuron will not use best current practice and will hide behind out-of-date or deficient procedures and result in a second-rate wind farm outcome. PSG refer to various Guidelines to "guide" the consideration. This includes archaic guides such as "Draft National Wind Farm Development Guideline 2010" which has remained as a draft because it was intended State jurisdictions would develop their own planning frameworks to manage concerns about wind farm developments. However "it is not a coincidence that progress at the state and territory level to develop robust wind farm development frameworks has also faltered and where progress has been made, it has not resulted in assessment, monitoring and compliance frameworks that are robust enough to alleviate negative impacts on the communities surrounding wind farm developments." 30 The EPA also appear to be using an out-of-date template for their PSG – for example March 2019 Victorian and Planning Guidelines are available, rather than January 2016 Guidelines quoted by EPA. Current best practice needs to be applied in the impact assessment.

Current best practice to be used by Epuron for WESTERN PLAINS WIND FARM must include court precedents, recent guideline and code developments, and expert advice and review. For example, the South Australian Draft Planning and Design Code Phase Two (Rural Areas), Oct 2019 31 provides for a base 2km setback from settlements plus an additional 10m of setback per additional metre of tip height above 150m (or 2.9km for WESTERN PLAINS WIND FARM).

4.20 Business case

Epuron is required to outline the business environment for the project – general background on the proposal, likely markets and how it relates to other proposals. RSP-NWT has concerns the business case for WESTERN PLAINS WIND FARM does not stack-up and therefore the environmental impact is not justified and can be avoided. Epuron is not the operator and has a vested interest to use whatever means to get approval and then sit on it until investors are found to construct and operate.

Due diligence on the business case is needed since Epuron is using it to publicly justify the business as part of the social reason for the project. Epuron says it will meet Tasmania's medium-term power requirement, increase local energy security, help reserve hydro generating capacity, lower local electricity retail price, and "capitalise" on Marinus. RSP-NWT investigations show WESTERN PLAINS WIND FARM is not needed to power Tasmania and Tasmania can be choosy on wind farm locations because of the amount of new renewable energy projects under consideration.

Epuron is conflating its own short-term business interests with that of Tasmania's short-and long-term interests. Therefore, it is imperative that the WESTERN PLAINS WIND FARM business rationale and environment need to be outlined in the DPEMP and the project viability justified for Tasmanians. Ultimately the absence of WESTERN PLAINS WIND FARM is the best environmental outcome for Stanley and the need for WESTERN PLAINS WIND FARM must be demonstrated.

Thus, Epuron must outline the business environment and the business proposal in the DPEMP so proper consideration can occur. Specifically:

- a) The status of the electricity market in Tasmania – including figures on demand by Tasmania for power; available supply of power to Tasmanian consumers; supply from new solar and wind farm approvals; the increase in supply from projects currently being considered; sensitivities in supply – such as a possible reduction in demand due to key industry closures (e.g., Temco is under review and if closed would free up 12% more power); and the net surplus power available.
- b) Tasmania's capacity to export surplus power to the mainland – quantity available, Basslink capacity and oversubscription.
- c) Epuron sales opportunity without Marinus and the implications for WESTERN PLAINS WIND FARM.
- d) Capacity of the transmission line network serving Stanley, current and intended usage and surplus capacity available to Epuron.
- e) Epuron's intended financial contribution to Marinus.
- f) Effect of wind power on Tasmanian network stability, the likelihood of 'blackouts' in Tasmania, upgrades required to the Tasmanian Network because of unreliable wind power (and who pays for any upgrades), and system strength issues.
- g) Taxpayer subsidies involved in wind power generation and taxpayer subsidies to Epuron including Epuron's contribution to the Tasmanian transmission line/network capital costs.

- h) Renewable energy developments on Mainland. NSW has recently announced planned for 17800MW of renewable energy from three locations, and a 2000MW Snowy 2.0 project and 2000MW Star of South wind farm in Victoria is being assessed (by comparison, HydroTas capacity is about 2300MW).
- i) Analysis of business risk for the investor; and the implication for a \$30M+ bond to ensure Rehabilitation of the site once the wind farm is decommissioned.

Epuron's planned Wind Farm operates in a business-economic environment that is new and changing; and without an understanding of the wind generators environment, proper consideration cannot occur either by the community or the EPA Board and appropriate safeguards adopted. This is fundamental to any DPEMP given the level of public interest and concern given 74 (2), (4a), 4(b) of EMPC Act (1994).

4.21 Concern about WESTERN PLAINS WIND FARM consultation and due process by Epuron.

Epuron has not yet met requirements for proper consultation with the community as indicated in PSG and has not met their responsibilities under the Clean Energy Council's Best Practice Charter. Epuron must include a table in the DPEMP outlining each concern raised, Epuron's response, and reasons for their response. Epuron has only engaged in nominal consultation practices and need to be held accountable for the concerns raised.

RSP-NWT has also recognised due process has not been followed by Epuron and it will result in a suboptimal outcome. Epuron is required in PSG to modify, ameliorate or eliminate matters and if this is not possible to enter into compensation arrangements with those concerned. Epuron has entered into compensation 'agreements' with some landholders in the first instance before modifying, ameliorating or eliminating the concern - thereby creating an environmental cost which is borne by the broader community.

WESTERN PLAINS WIND FARM management processes should also include Covenants on retained vegetation to avoid future impacts such as eagle nest destruction; approval conditions to avoid future turbine creep (Stage 2 additions); and financial penalties for killing any individual of a protected species (so there is an incentive for avoidance).

Epuron should also model how compliance to licence conditions will be monitored and resourced, particularly given the project will be on sold. Will Epuron provide a trust for use of the Circular Head Council to resource monitoring – or will the cost be borne by ratepayers?

4.21 Concern about alternatives to be considered.

RSP-NWT are concerned significant alternatives in the DPEMP will be overlooked by Epuron. The DPEMP needs to consider both off-site and on-site alternatives because they minimise or eliminate adverse impacts created by WESTERN PLAINS WIND FARM.

Off-site alternatives. Off-site alternatives to be considered include but are not limited to:

- a) No wind farm at the Stanley Peninsula
- b) Alternative location for the project
- c) Alternatives considered in Victoria and NSW. Tasmania is oversubscribed with power because of new solar and wind farm developments and Hydro power and renewable energy from closer to the market needs to be assessed.
- d) Solar farming rather than wind farming; and

Each of these alternatives needs to be evaluated against the full range of environmental and socio-economic impacts. Community members are deeply concerned that there has been insufficient consideration of alternatives that would not place an industrial windfarm in a community and a historic tourist town.

4.22 Use of offsets

RSP-NWT have concerns those offsets used for wind farms do not protect local populations. Offsets are measures that are supposed to compensate for the effect of WESTERN PLAINS WIND FARM on matters of national environmental significance – to give a net improvement or maintenance of the entity. The Australian National Audit Office indicates offsets have a net negative effect 33 because habitat cannot be improved in another area to compensate for degradation (in WESTERN PLAINS WIND FARM area). Therefore, the DPEMP must indicate:

- a) Offsets do not apply to WESTERN PLAINS WIND FARM.
- b) No offsets are allowed where offsets are already applied in the local area.
- c) No offsets are allowed where the offset site is already protected (such as under The Nut State Reserve Management Plan Tasmanian Land Conservancy tenure, State Forests, Conservation Covenants on private land, or where nests are already protected under State law); and
- d) Wind Farm re-design is to occur rather than use of offsets.

4.23 Investment risk

The DPEMP should outline investor risk from an environmental perspective to inform an Investor and the Regulatory Authority of the viability of the project and likely rehabilitation consequences.

This risk includes lack of a community licence, operational restrictions such as raptor shutdowns, building of new eagle nests near turbines (additional turbine closures), non-compliance with noise conditions (compensation and shutdowns), financial risks (price taker, lack of sales to Victoria because of new renewable energy investments, increased transmission costs, loss of subsidies for wind energy, capital payment for Marinus connector) and technical risks (such as technological improvements to solar storage) as well as environmental risks (such as more restrictive Recovery Plan requirements over the next 25 years).

The DPEMP is required to consider a worse-case scenario. For WESTERN PLAINS WIND FARM, investor risk is high, the likely hood of insolvency real, the probability of closing before the 25-year life span must be expected – and therefore the environmental outcome requires:

- a) A bond to be held to cover the full cost of rehabilitation (in excess of \$30M); and
- b) Disposal plans for blades in Circular Head Council land fill to be outlined in the DPEMP (as the blades will not be recycled) to include impacts on the community as the disposal plan is implemented.

4.24 Infrastructure and overseas ownership concerns.

Community concern exists about another social issue - ownership of essential infrastructure by foreign companies. Epuron Pty Ltd, a Sydney based company, is not the investor or operator. The DPEMP should tabulate ownership of wind farms in Australia to properly inform the community about foreign ownership status of wind farms as it is a social concern. Epuron should outline whether or not the WESTERN PLAINS WIND FARM project will be limited to Australian ownership.

4.25 Cradle to the Grave concerns.

RSP-NWT are concerned significant matters involving 'Cradle to the Grave' matters will be overlooked by Epuron. The long-term impacts and full consequences of the wind farm need to be considered. Cradle to the grave considerations are required for social and environmental consideration for WESTERN PLAINS WIND FARM. In this regard, the DPEMP needs, to consider:

- a) Electricity used from cradle to the grave to establish the wind farm – including turbine production, transport, concrete use, Marinus connection, decommissioning etc. RSP-NWT understand it takes about 10 years of power from a wind farm to equal the electricity used to build the wind farm. The electricity and other resources used for the Project need to be outlined so the environmental impact can be evaluated.
- b) Carbon balance for cradle to the grave for WESTERN PLAINS WIND FARM.
- c) Subsidies for WESTERN PLAINS WIND FARM – from the cradle to the grave.
- d) Wedge tailed eagle deaths – for the project from cradle to the grave including turbine and transmission line killings.
- e) Instability of the electricity network from wind power and upgrades needed.
- f) Expenditure estimates – from the cradle to the grave including estimated expenditure in China/overseas, Mainland expenditure, and Tasmanian expenditure.

Cradle to the Grave analysis will show gaps in the Epuron proposal - such as the scale and number of pads for turbines will mean major new gravel quarries will be required and these should be considered as part of the impact assessment and require a separate DPEMP.

5. Conclusion

RSP-NWT raise the above significant concerns to be addressed by Epuron in their impact assessments for WESTERN PLAINS WIND FARM; for discussion with RSP -NWT on pathways to address these matters; and for action by Epuron prior to submission of the draft DPEMP to EPA as required under Project specific guidelines. Western Plains and the Stanley Peninsula is an area of very high environmental, social, cultural, tourism and landscape significance and requires proper consideration and protection. This cannot occur unless the significant concerns raised by RSP-NWT are addressed by Epuron.

If any additional concerns are presented to us by members of the public, or are identified during discussion and/or investigation of the WESTERN PLAINS WIND FARM proposal, we will forward these onto Epuron as additional concerns for consideration and attention in the DEMP.

Kerry Houston

Kerry Houston

Secretary – Respect Stanley Peninsula – No Wind Turbines Inc.

CC – Environmental Protection Agency.

Cc – Circular Head Council

Cc: Hon Peter Gutwein, Premier

Cc: Hon Guy Barnett, Minister

Cc: Hon Roger Jaensch, Minister

Cc Hon Jeremy Rockcliff Minister

Cc: Hon Ruth Forrest MLC

Cc: Saul Eslake

Cc: Charles Wooley

Cc: Hon Rebecca White, Leader of opposition

Cc: Andrew Dyer – Australian Energy Infrastructure Commissioner

Cc: Hon Felix Ellis Minister