

Ms Kerry Houston, Secretary  
Respect Stanley Peninsula – No Wind Turbines Inc.  
Via email: [respectstanleypeninsula@yahoo.com](mailto:respectstanleypeninsula@yahoo.com)

December 2021

## Re: Notification of significant matters of concern, Western Plains Wind Farm

Dear Kerry,

Thank you for providing Epuron with Respect Stanley Peninsula-No Wind Turbines Inc's (RSP-NWT) detailed outline of matters of concern.

Epuron has noted all your concerns and your recommendations for the Development Proposal and Environmental Management Plan (DPEMP). Please find in the following tables initial responses, noting those matters that will be addressed more comprehensively in the DPEMP and some that are outside of the scope of the planning and assessment process.

As you correctly note the DPEMP and accompanying assessment reports will be prepared in accordance with the Project Specific Guidelines and the General Guidelines (the guidelines) that have been issued for Western Plains Wind Farm by Environment Protection Authority Tasmania.

After the DPEMP has been finalised and accepted it will be put on exhibition and members of the public will have the opportunity to review it and make a submission.

If you have further questions please let me know. We would welcome the opportunity to engage directly with RSP-NWT to try to resolve your concerns.

Please do not hesitate to contact me via email at any time.

Yours sincerely,



**Sandra Weinhold**  
Project Manager

Matter of concern	Epuron response and comments
<b>4.1 Visual, landscape, ridgeline and skyline</b>	
<p>Visibility of wind turbines from areas within Stanley; major historic areas of the town, Highfield Historic Site, the main street, Alexander Terrace and other areas within the township.</p> <p>Views of The Nut, from 7-mile beach, from Smithton and along the coast.</p> <p>Views to/from Highfield house and from the Old Cable Station.</p>	<p>Wind turbines would not be visible from most parts of Stanley due to the topography and the natural escarpment between the township and the proposed wind farm site.</p> <p>Where wind turbines or parts of them would be visible has been shown in the Zone of Visual Influence map that has been shared with the community and is available online at:  <a href="https://epuron.com.au/documents/828/Western_Plains_Wind_Farm_Community_Information_Session_ZVI_June2021.pdf">https://epuron.com.au/documents/828/Western_Plains_Wind_Farm_Community_Information_Session_ZVI_June2021.pdf</a></p> <p>Views from example locations in Stanley and nearby surrounds where wind turbines or parts of them would be visible have been provided in photomontages. These have been done for views from: Church St, The Nut, Green Hills Rd at the Old Cable Station and Highfield Historic Site, and Dovecote Rd at Jimmy Lane Memorial Lookout. These are available online at:  <a href="https://epuron.com.au/news/2021/6/28/243-information-session-held-in-stanley/">https://epuron.com.au/news/2021/6/28/243-information-session-held-in-stanley/</a></p> <p>The view from Anthony Beach was provided in a photomontage that was published in the September 2021 project update, which is available online at:  <a href="https://epuron.com.au/documents/844/WesternPlainsWindFarm_Update_Sep_2021.pdf">https://epuron.com.au/documents/844/WesternPlainsWindFarm_Update_Sep_2021.pdf</a></p> <p>Highfield house is more than 3 km from the wind farm, with views from Highfield house to the wind farm in almost the opposite direction to views from Highfield house to The Nut. A photomontage to show the view from Green Hills Rd at Highfield Historic Site is available online at:  <a href="https://epuron.com.au/documents/839/Western_Plains_Wind_Farm_PM3_Green_Hills_Rd_Highfield_Historic_Site_QZNpEah.pdf">https://epuron.com.au/documents/839/Western_Plains_Wind_Farm_PM3_Green_Hills_Rd_Highfield_Historic_Site_QZNpEah.pdf</a></p> <p>The view from the privately owned Old Cable Station is interrupted by trees. A photomontage to show the view from Green Hills Rd at the Old Cable Station is available online at:  <a href="https://epuron.com.au/documents/837/Western_Plains_Wind_Farm_PM2_Green_Hills_Rd_Cable_Station_7GDCmYD.pdf">https://epuron.com.au/documents/837/Western_Plains_Wind_Farm_PM2_Green_Hills_Rd_Cable_Station_7GDCmYD.pdf</a></p> <p>The DPEMP will include more photomontages and wireframes from other locations and a detailed assessment for potential impacts on visual amenity, based on the criteria and requirements prescribed in the guidelines.</p>
<p>Impact on the visual landscape of The Nut.</p> <p>Compatibility with the Nut State Reserve Management Plan 2003.</p>	<p>The Nut would not typically be in the same field of view as the wind farm, including from lookouts around the peninsula that face towards the township.</p> <p>The closest wind turbine is more than 4 km from The Nut and the wind farm is located in the opposite direction to the skyline of The Nut.</p> <p>Note, blade tips would reach a maximum of 17m higher than The Nut, with the two locations being more than 4km apart.</p> <p>Consideration of The Nut and the Nut State Reserve Management Plan 2003 has been included in the visual amenity assessment, which will be in the DPEMP.</p>
<p>Cumulative impact</p>	<p>The DPEMP will include an assessment of cumulative and interactive impacts with specific reference to visual and landscape amenity.</p>

Matter of concern	Epuron response and comments
<b>4.2 Vibration concerns</b>	
<b>4.2.1 Vibrations and human health</b>	
<p>Vibration from turbines and construction.</p> <p>Health problems and conditions caused by prolonged exposure to vibration.</p> <p>Assessment of vibration at dwellings within and neighbouring the wind farm.</p> <p>Adherence to appropriate OH&amp;S standards.</p> <p>Impact on child sleep patterns and behaviour.</p>	<p>Wind turbines are designed and engineered to minimise vibration.</p> <p>The relationship between operating wind farms and health effects has been the subject of extensive review by independent medical and research organisations including the Australian Medical Association (AMA) and the National Health and Medical Research Council (NHMRC). To date there is no evidence of a causal relationship between operating wind turbines and adverse health effects. The NHMRC's Statement: Evidence on Wind Farms and Human Health (2015) states: <i>'After careful consideration and deliberation of the body of evidence, NHMRC concludes there is currently no consistent evidence that wind farms cause adverse health effects in humans'</i>.</p> <p>The New Zealand Standard 6808:2010 <i>Acoustics – Wind farm noise</i>, which is prescribed by the guidelines, advises: <i>'Although wind turbines may produce some sound at (ultrasound and infrasound) frequencies outside the normal range of human hearing these components will be well below the threshold of human perception...The amount of evidence does not justify at this stage, any attempt to set a precautionary limit more stringent than those recommended [in the Standard].'</i></p> <p>Findings from the ongoing Wind Farm Noise Study by researchers at the Adelaide Institute for Sleep Health, part of the Flinders Health and Medical Research Institute: Sleep Health at Flinders University are that wind turbine noise does not have a measurable impact on sleep patterns.</p> <p>The DPEMP will include a detailed assessment for noise and vibration emissions, based on the criteria and requirements prescribed in the guidelines.</p> <p>The project would have appropriate workplace health and safety procedures in place during construction and operation.</p>
<b>4.2.2 Vibrations/Noise and geographic and wider concerns</b>	
<p>a. Potential impact on bore water on neighbouring properties.</p>	<p>The DPEMP will include assessment for potential impacts on groundwater, based on the criteria and requirements prescribed in the guidelines. This will consider the closest bore holes on neighbouring properties.</p>
<p>b. Impact on The Nut</p>	<p>The project's distance from The Nut means that assessing vibrational/noise at The Nut is outside of the scope of assessment.</p>
<p>c. Potential impact on the Abalone farm</p>	<p>The DPEMP will include assessment for potential impacts on the marine and coastal environment, based on the criteria and requirements prescribed in the guidelines.</p> <p>Given the distance between the proposed wind farm site and the Abalone farm, and consequently the lack of impact pathway, this has not been assessed as part of the DPEMP.</p>

Matter of concern	Epuron response and comments
<b>4.2.2 Vibrations/Noise and geographic and wider concerns (cont.)</b>	
d. Soil removal	The DPEMP will include assessment for potential impacts on land systems and soils, including management of acid sulfate soils, based on the criteria and requirements prescribed in the guidelines.
e. Impacts of noise and vibration on coastal creatures.	The DPEMP will include assessment for noise and vibration emissions and potential impacts based on the criteria and requirements prescribed in the guidelines. Assessment of impacts of noise and vibration on coastal creatures is outside the scope of the DPEMP.
f. Impacts of noise and vibration on fish growth and hatching.	The DPEMP will include assessment for noise and vibration emissions and for potential impacts based on the criteria and requirements prescribed in the guidelines. Assessment of impacts of noise and vibration on fish growth and hatching is outside the scope of the DPEMP.
g. Impacts of reducing the quality of soil on neighbouring properties from additional wind. Impact of noise/vibration on farming animals.	<p>Epuron is unclear on the reasoning for additional wind and link to soil quality. Wind turbines harness existing wind, they do not create wind.</p> <p>The DPEMP will include assessment for noise and vibration emissions based on the criteria and requirements prescribed in the guidelines.</p> <p>The proposal involves a cattle-grazing property. Wind farms and grazing are complementary land uses. There is no evidence that wind turbines have any adverse effects on domestic animals and livestock. Livestock appear to be unaffected by the presence of wind turbines and will often graze beneath them and use the towers for shelter and shade.</p>
h. Impacts of noise and vibration on horses and foals in utero.	The DPEMP will include assessment for noise and vibration emissions based on the criteria and requirements prescribed in the guidelines. Assessment of impacts of noise and vibration on horses and foals in utero is outside the scope of the DPEMP.
i. Impact of materials released into the environment.	The DPEMP will include assessment for potential impact on air quality and plans for waste management, dangerous goods and potentially hazardous materials, based on the criteria and requirements prescribed in the guidelines.
j. Impact on use of ultra-light aircraft in the area.	There will be no impact to aircraft in the area. All flights pre and post construction must comply with the stated requirements of flight safety agencies. The wind farm will be included on aviation maps and charts.
k. Impact on sheep on adjacent properties from construction including dust emissions.	The DPEMP will include assessment for potential impact on air quality based on the criteria and requirements prescribed in the guidelines.
Impacts of vibration and construction.	The DPEMP will include assessment for noise and vibration emissions, based on the criteria and requirements prescribed in the guidelines.

Matter of concern	Epuron response and comments
<b>4.3 Noise concerns</b>	
<p>a. Classification of Stanley peninsula as an area of concern.</p> <p>b. Classification of the Stanley peninsula as a high amenity noise area.</p>	<p>The criteria and methodology for noise assessment is prescribed in the guidelines.</p> <p>The project is predicted to be well within the prescribed noise limits and to also comply with the more stringent, but not required in this case, high amenity limit.</p>
<p>c. Noise data and noise modelling in the draft DPEMP.</p>	<p>The DPEMP will not include raw technical data. It will include results from noise monitoring and predicted noise levels based on predictive noise modelling. The Environmental Noise Assessment technical report will be attached to the DPEMP and will provide additional details on the noise modelling method.</p>
<p>d. Noise from different wind turbines and configurations.</p>	<p>It is a requirement that the noise modelling is based on the candidate wind turbine and site design. After the wind turbine model to be constructed has been confirmed, noise modelling will be repeated based on that model.</p>
<p>e. Research into the effect of infrasound on the health of residents and neighbours.</p>	<p>The relationship between operating wind farms and health effects has been the subject of extensive review by independent medical and research organisations including the Australian Medical Association (AMA) and the National Health and Medical Research Council (NHMRC). To date there is no evidence of a causal relationship between operating wind turbines and adverse health effects, including from infrasound.</p> <p>The AMA's Position Statement – Wind Farms and Health (2014) states: <i>'The available Australian and international evidence does not support the view that the infrasound or low frequency sound generated by wind farms, as they are currently regulated in Australia, causes adverse health effects on populations residing in their vicinity. The infrasound and low frequency sound generated by modern wind farms in Australia is well below the level where known health effects occur, and there is no accepted physiological mechanism where sub-audible infrasound could cause health effects.'</i></p> <p>The New Zealand Standard 6808:2010 <i>Acoustics – Wind farm noise</i>, which is prescribed by the guidelines, advises: <i>'Although wind turbines may produce some sound at (ultrasound and infrasound) frequencies outside the normal range of human hearing these components will be well below the threshold of human perception...The amount of evidence does not justify at this stage, any attempt to set a precautionary limit more stringent than those recommended [in the Standard].'</i></p> <p>Scientific research into wind turbine noise and human health is outside the scope of the DPEMP.</p>
<p>f. Options to turn off wind turbines when noise levels are exceeded.</p>	<p>Compliance with noise limits must be demonstrated prior to construction and during operation via a monitoring program. The project is predicted to be well within the prescribed noise limits and to also comply with the more stringent, but not required in this case, high amenity limit.</p>
<p>Bald Hills Wind Farm P/L v South Gippsland Shire Council (2020).</p>	<p>The circumstances of Bald Hills Wind Farm are different to those for Western Plains Wind Farm.</p>
	<p>A comprehensive technical noise assessment has been undertaken by leading acoustic consultants Marshall Day Acoustics in accordance with the guidelines. More information will be available in the assessment for noise and vibration emissions in the DPEMP.</p>

Matter of concern	Epuron response and comments
<b>4.4 Sensitive use of adjacent land and impact on residents and tourism and heritage</b>	
Town growth to the west of Stanley.	The project would not inhibit Stanley's growth to the west. Most of the land within 3 km from proposed wind turbines, between the wind farm and the township, is privately owned by the host landowner and used for agriculture/cattle grazing, therefore not available for town growth.
Impact for developer groups and on potential investment.	The DPEMP will include potential socio-economic impacts, based on the criteria and requirements prescribed in the guidelines. The impact for potential developer groups and unrelated potential investment is outside the scope of the DPEMP.
Australian Energy Infrastructure Commissioner's recommendations on setback distances.	<p>The Australian Energy Infrastructure Commissioner's recommendations are for consideration by planning authorities and to be taken in context. Epuron also understands the term 'materially populated township' is in reference to a township's permanent resident population.</p> <p>Consideration was given to the distance to Stanley, in particular to the topography that limits views, to current land use and to land ownership.</p>
Loss to landowners of opportunity for subdivision and restriction of town growth.	Most of the land within 3 km from proposed wind turbines, between the wind farm and the township, is privately owned by the host landowner and used for agriculture/cattle grazing, therefore not available for town growth. The project would not prevent subdivision. This is an unrelated planning matter.
Tourism	<p>The DPEMP will include potential socio-economic impacts, based on the criteria and requirements prescribed in the guidelines. This will include tourism.</p> <p>To note, there are no examples in Australia where local tourism has been negatively affected by a wind farm, nor any peer-reviewed studies to evidence that wind farms have a negative impact on tourism.</p> <p>Operating wind farms are often part of their local tourism industry, such as in Tasmania with Woolnorth Wind Farm in the north-west and Musselroe Wind Farm in the north-east.</p>
Film industry appeal	Epuron understands that it is standard practice for unwanted details to be edited out of film footage during post-production if required.
Impacts on Highfield Historic Site	<p>The DPEMP will include a detailed assessment for potential impacts on visual amenity, based on the criteria and requirements prescribed in the guidelines.</p> <p>To note, views to and from historic areas and sites such as from Highfield house towards Stanley/The Nut over the peninsula will remain mostly uninterrupted. The wind farm would be in the opposite direction.</p>
New roads across the Green Hills	The DPEMP will include assessment for potential impacts involving access tracks and the proposed road upgrade to Green Hills Road.
Alternate areas	The DPEMP will outline project rationale and alternatives.
Impact on real estate prices	<p>The DPEMP will include potential socio-economic impacts based on the criteria and requirements prescribed in the guidelines. This will consider property values.</p> <p>To note, Australian research into whether wind farms affect property values has found there is no correlation between the two.</p>

Matter of concern	Epuron response and comments
<b>4.5 Community trust and social licence</b>	
<p>In the case where many years have passed prior to construction and wind turbine technology has advanced it is not unusual for a wind farm developer to apply for an amendment to use a newer model of wind turbines.</p> <p>Any future owner of the project must abide by the obligations, conditions and commitments attached to the development approval. Factors such as wind turbine locations or maximum height cannot be changed without approval of a new development application.</p> <p>An outline of Epuron’s sold projects that have had amendments approved was provided to RSP-NWT in August 2021 and is available online at:  <a href="https://epuron.com.au/documents/842/Responses_questions_from_RSP_and_communitymeeting_11July.pdf">https://epuron.com.au/documents/842/Responses_questions_from_RSP_and_communitymeeting_11July.pdf</a></p> <p>To note, the definition of social licence for renewable energy project development is provided in the Victorian Department of Environment, Land, Water and Planning’s <i>Community Engagement and Benefit Sharing Guide</i> as a ‘level of acceptance or approval continually granted to an organisation’s operations or project by the local community’ (Boutilier, R. G., and Thomson, I., 2011).</p>	
<b>Shadow flicker and blade glint assessment</b>	
Shadow flicker and glint	The DPEMP will include a detailed assessment for potential impacts on visual amenity based on the criteria and requirements prescribed in the guidelines. This will include shadow flicker and glint.
<b>4.7 Electromagnetic radiation, electrical and communication concerns</b>	
Electromagnetic interference (EMI) with radio communications and emergency services.	The guidelines for the project do not prescribe an EMI assessment for the DPEMP. Epuron’s own investigations indicate no impact is expected for any radio, broadcast, cellular, radar or internet communications systems. The proposed location for the wind farm is not near any communications towers and there are no existing point-to-point communication links that cross the site.
Transmission line electromagnetic effects on human and animal health.	<p>Electric and magnetic fields (EMF) are both naturally occurring and associated with electricity. Leading health authorities such as the World Health Organisation (WHO) have found no evidence that confirms the existence of any health consequences from exposure to low-level electromagnetic fields, the type emitted from transmission lines.</p> <p>The WHO advises: <i>‘current evidence does not confirm the existence of any health consequence from exposure to low level electromagnetic fields.’</i></p> <p>The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) advises: <i>‘The scientific evidence does not establish that exposure to the electric and magnetic fields found around the home, the office or near powerlines causes health effects’</i> and <i>‘There is no established evidence that the exposure to magnetic fields from powerlines, substations, transformers or electrical sources, regardless of the proximity, causes any health effects.’</i></p>

Matter of concern	Epuron response and comments
<b>4.8 Social considerations</b>	
a) Construction employment figures b) Operational and maintenance employment c) Construction jobs	The DPEMP will include forecasts for the construction and permanent workforce and potential socio-economic impacts based on the criteria and requirements prescribed in the guidelines. This will include employment.
d) Properties to be bought for post construction workers	The proposal does not involve purchasing residential property to provide accommodation for workers. The project is not expected to impact the availability or affordability of local property.
e) Capital cost and expenditure	Total capital costs and investment will be included in the DPEMP.  Allocation of expenditure is outside of the scope of the DPEMP however the proponent will be encouraged to preference local and regional workers, suppliers, contractors and businesses where practicable.
f) Impact and delays from transport aspects of construction.	The DPEMP will include a detailed assessment for potential impacts on traffic based on the criteria and requirements prescribed in the guidelines.  A Traffic Management Plan would be finalised prior to construction in consultation with the community to understand peak times and optimal times for component delivery to minimise disruption.
Research into the effects of people moving away from a township.	This is outside the scope of the DPEMP.
<b>4.9 Fire concerns</b>	
Increased risk of fire  Aerial firefighting	The DPEMP will include an assessment of potential fire risk, based on the criteria and requirements prescribed in the guidelines.  To note, wind turbines are designed to mitigate fire risk. They are constructed with fire resistant materials and operated by sophisticated monitoring systems that automatically follow shutdown procedures in response to operational issues and can be remotely shut down in the event of fire in the area. Wind turbines also provide a safe path to ground for lightning strikes and access tracks act as natural fire breaks.  Current fire management protocols implemented within the wind farm site would be continued and a Fire Response Plan (FRP) would be implemented prior to construction. This would include fire safety information from relevant authorities including the SES, Tasmanian Fire Service and local police.  Firefighting on the site would be managed in the same way as any other area, using ground- and air-based resources subject to prevailing weather conditions and avoiding wind turbines in the same manner as any other obstructions such as buildings or power lines.  A fire trailer will be located on the wind farm property.
a) Documentation of known fires from wind generators in Australia and the effect of the fire.	This is outside the scope of the DPEMP however it may be a matter of public record and can be researched online.



Matter of concern	Epuron response and comments
<b>4.9 Fire concerns (cont.)</b>	
b) Access to water and protection of neighbours' assets.	Current fire management protocols implemented within the wind farm site would be continued and a Fire Response Plan (FRP) would be implemented prior to construction.
c) Fire Prevention and Protection Plans.	Current fire management protocols implemented within the wind farm site would be continued and a Fire Response Plan (FRP) would be implemented prior to construction.
d) Use of AFAC guidelines to develop a 'Protection Plan for Settlements and Dwellings Adjacent to WESTERN PLAINS WIND FARM' in association with neighbours.	Noted.
e) Forest Fire Protection Plan (including fuel reduction burning).	This is not considered applicable for this project. The property is used for cattle grazing and there is no forest within the project boundary.
f) Additional resources so there is capacity to implement all fire plans.	Current fire management protocols implemented within the wind farm site would be continued and a Fire Response Plan (FRP) would be implemented prior to construction. This would include fire safety information from relevant authorities including the SES, Tasmanian Fire Service and local police.  A new fire trailer would also be located on the wind farm site.
g) Make sure community and emergency service communication capabilities are not impacted.	Noted. No impact is expected.
<b>4.10 Setbacks</b>	
<p>a) Adopt current best practice setback distances.</p> <p>b) Disclose the blade material throw and safety distances specified by the manufacturer.</p> <p>c) Identify and establish an appropriate km distance spacing between towers.</p> <p>d) At least 3 km setbacks of turbines from settlements.</p> <p>e) At least 2 km setbacks of turbines from isolated dwellings.</p> <p>f) At least 3km setback distances from Wedge-tailed eagle nests.</p> <p>g) Setbacks from water bodies to allow aerial access for firefighting.</p>	<p>The proposal will observe any prescribed setback distances.</p> <p>The final wind turbine model will be determined following the procurement process. Any safety measures specified by the manufacturer will be observed.</p> <p>The project has been designed with appropriate distances between wind turbines.</p> <p>The nearest proposed wind turbine is more than 4 km from the township of Stanley</p> <p>There is no 2 km setback prescribed.</p> <p>There are no Wedge-tailed eagle nests on the site. The closest known wedge-tailed eagle nest is more than 5 km from the nearest wind turbine. Setbacks for birds would follow EPA prescribed distances.</p> <p>There are no water bodies that would be used for firefighting within the site.</p>

Matter of concern	Epuron response and comments
<b>4.11 Cumulative impacts</b>	
a) Social values, landscape, skyline, 'cradle to the grave CO2 production', property values, infrasound, road maintenance, and Stanley heritage and tourism values.	<p>The DPEMP will include an assessment of cumulative and interactive impacts based on the criteria and requirements prescribed in the guidelines. This will include visual and landscape amenity.</p> <p>The project is not expected to have impacts with regards to property values, infrasound, road maintenance, heritage and tourism values. Therefore these matters have not been included in cumulative assessment.</p>
b) Threatened and endangered flora and fauna including wedge-tailed eagles, white-bellied sea-eagles, Tasmanian masked owl, Tasmanian devil, Spotted-tailed quoll, invertebrates and flora.	<p>The DPEMP will include an assessment of cumulative and interactive impacts based on the criteria and requirements prescribed in the guidelines. This will include raptors and terrestrial fauna.</p>
c) Approvals to use Identiflight.	<p>The use of Identiflight is not proposed for this project.</p>
d) State-wide impacts.	<p>This is outside the scope of the DPEMP.</p>
e) Including CHWF, AEMO identified areas, and Epuron self-disclosed intentions.	<p>Cattle Hill Wind Farm in the Central Highlands, AEMO identified areas and other Epuron projects are outside the scope of the DPEMP.</p>
f) Including the 2019 wildfire on flora and fauna which has already put local populations under stress.	<p>Epuron is not aware of a 2019 fire on or near the Western Plains site.</p>
Offsets	<p>This is outside the scope of the DPEMP.</p>
<b>4.12 Tasmanian wedge-tailed eagles</b>	
<p>The DPEMP will include assessment of potential impacts and their management for wedge-tailed eagles.</p> <p>Utilisation surveys have found there are no nests within the site and the nearest known nest is more than 5 km from the closest wind turbine.</p> <p>The wind farm site is not considered to be wedge-tailed eagle territory.</p> <p>GPS tracking is not considered to be required.</p> <p>The use of Identiflight is not proposed for this project.</p> <p>Monitoring measures will be outlined in the DPEMP.</p> <p>The DPEMP will include an assessment of cumulative and interactive impacts, based on the criteria and requirements prescribed in the guidelines. This will include raptors.</p> <p>Offsets for the wedge-tailed eagle are not proposed.</p>	
<b>4.13 White-bellied sea-eagles</b>	
<p>Utilisation surveys have been completed for white-bellied sea eagles. A white-bellied sea-eagle nest was recorded 1 km south of the nearest wind turbine, which is equivalent to the buffer provided on other wind farm sites across Tasmania.</p> <p>The DPEMP will include assessment of potential impacts and their management for white-bellied sea eagles.</p>	

Matter of concern	Epuron response and comments
<b>4.14 Tasmanian masked owl</b>	
<p>Utilisation surveys have found there are no Tasmanian masked owl nests within the site and no likelihood of utilisation because there is no suitable nesting or foraging habitat on site.</p> <p>The DPEMP will include assessment of potential impacts for the Tasmanian masked owl.</p>	
<b>4.15 Birds</b>	
<p>Avian utilisation surveys have been completed at the site.</p> <p>The DPEMP will include an assessment of potential impacts on avifauna based on the criteria and requirements prescribed in the guidelines. This includes migratory shorebirds, orange-bellied parrot and resident shorebirds.</p>	
<b>4.16 Bats</b>	
<p>The DPEMP will include an assessment of potential impacts on avifauna based on the criteria and requirements prescribed in the guidelines. This includes bats.</p>	
<b>4.17 Technical and data matters</b>	
<p>Technical information from the turbine manufacturer.</p> <p>Data for collision risk and noise modelling.</p> <p>Project design</p>	<p>The final wind turbine model will be determined following the procurement process.</p> <p>The DPEMP will not include raw technical data. Modelling has been done by independent specialists. The Environmental Noise Assessment technical report will be attached to the DPEMP.</p> <p>The project has been designed in consultation with a variety of specialists and subject matter experts. Epuron considers the design proposed in the DPEMP is the optimal current design for this site.</p>
<p>Wind turbines containing sulfur hexafluoride (SF6).</p>	<p>SF6 gas is used in the switchgear of many power applications. Its use is highly regulated and alternative more environmentally friendly insulating gases are being pursued.</p> <p>It is not known whether the wind turbines will contain SF6. This information will be available from the manufacturer after the final wind turbine model has been selected.</p>
<p>a) An 'Independent Technical Review of Components'</p> <p>b) An 'Independent Technical Review of Data and use of Data in Wind Farm Design.'</p> <p>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.</p>	<p>This is outside of the scope of the DPEMP.</p>
<b>4.18 Wind direction</b>	
<p>The DPEMP will not include raw technical data.</p> <p>Epuron's wind data is based on years of monitoring on the site using industry leading wind monitoring equipment.</p>	

Matter of concern	Epuron response and comments
<b>4.19 Use of current best practice and information</b>	
Epuron is one of the longest operating and most experienced wind energy project developers in Australia. Epuron follows best practice assessment procedures and standards, in accordance with planning and assessment requirements.	
<b>4.20 Business case</b>	
<p>The business case for new renewable energy projects to transition the country's electricity market to clean, renewable energy and reduce carbon emissions is well established and understood.</p> <p>The DPEMP will outline the project rationale.</p> <p>Decision-making around renewable energy priorities for Tasmania is a matter for the Tasmanian Government. Otherwise, these matters are outside the scope of the DPEMP.</p>	
<b>4.21 Concern about consultation and due process by Epuron</b>	
<p>The DPEMP will outline stakeholder consultation and community engagement undertaken for the project.</p> <p>If the project is approved, the approval is for the planning envelope as described in the DPEMP and consent conditions will be determined by planning authorities. Any future owner must abide by the obligations, conditions and commitments attached to the approval.</p> <p>EPA regulatory officers will ensure compliance with any environmental conditions during pre-construction, construction, commissioning, operation and decommissioning. Community engagement will continue ahead of and during construction, and throughout operation.</p>	
<b>4.21 Concern about alternatives to be considered</b>	
The DPEMP will outline project rationale and alternatives.	
<b>4.22 Use of offsets</b>	
No impacts requiring offsets are anticipated.	
<b>4.23 Investment risk</b>	
This is outside the scope of the planning and assessment process and the DPEMP.	
<b>4.24 Infrastructure and overseas ownership concerns</b>	
<p>This is outside the scope of the planning and assessment process and the DPEMP.</p> <p>The rules and conditions of foreign investment in Australian infrastructure is determined by the Australian Government.</p> <p>Ownership of wind farms and infrastructure assets is often available on project websites.</p>	
<b>4.25 Cradle to grave concerns</b>	
<ul style="list-style-type: none"> <li>a) Electricity to establish the wind farm</li> <li>b) Carbon balance</li> <li>c) Subsidies</li> <li>d) Wedge-tailed eagles</li> <li>e) Instability of the electricity network</li> <li>f) Estimated expenditure in China/overseas, mainland and Tasmania.</li> </ul>	<p>Growth in renewable energy capacity and increased use of cleaner, renewable energy will reduce carbon emissions and mitigate the effects of climate change.</p> <p>There are no subsidies.</p> <p>The site is not considered to be wedge-tailed eagle territory.</p> <p>The project must pass a range of tests to be allowed to connect to the network.</p> <p>Otherwise, these matters are outside the scope of the planning and assessment process and the DPEMP.</p>