

Committee Secretary
State Development, Tourism, Innovation and Manufacturing Committee
Parliament House
George Street
Brisbane Qld 4000

SUBMISSION ON THE FOREST WIND FARM DEVELOPMENT BILL 2020

I have had the opportunity to review the outcomes from the Public Briefing on Monday 1 June 2020. I have some concerns regarding the statements made in answer to the questions by members of the Committee on the extent of the consultation with the Local Community Groups that now require clarification.

Accordingly, I thought it was important that I bring to the attention of the Committee the approach to Community Engagement with the Local Residents by Forest Wind so that it is clear that there was, to best of my knowledge, no community engagement with the local residents prior to the lodgement of the application for the Development Approval on 19 December 2019. Better details are set out below in respect of that Community Engagement with the Local Residents.

By way of comparison, I have also included the details of the Community Engagement by the Coopers Gap Wind Farm. Their engagement with the community commenced in May 2012 some nearly 5 years before the Cooper Gap Wind Farm lodged its application for development approval on 28 March 2017.

(a) Approach to Community Engagement with the Local Residents by Forest Wind **(i) Lack of appropriate Community Engagement with the Local Residents by the Applicant**

The Applicant for this development application had, to the best of my knowledge:

A. Prior to lodgement of the Development Approval on 19 December 2019

1. not undertaken any community engagement with local residents likely to be impacted by this development **prior to the application being lodged on 19 December 2019**; and

B. From 19 December 2019 to 21 February 2020

1. engaged only in the following activities of community engagement in that intervening period prior to the approval of the Development Approval dated 21 February 2020 (DA):

- Sent one letter to residents, dated 14 January 2020 (not received by us until 6 February 2020). **Copy attached (Appendix A).**
- This letter invited residents to three (3) two (2) hour information sessions held in local areas (Kia Ora, Tinana, and Poona) on 8th and 9th February 2020.
- In light of the lateness of receipt of this one letter, it did not afford residents and absent property owners sufficient time to attend the proposed information sessions.
- The information did not provide a high level of detail, in particular, the map contained no geographical markers beyond references to the Bruce Highway, Tin Can Bay Road, and Maryborough Cooloola Road.
- Consequently, this level of community engagement failed to inform reasonably local residents and property owners of the true impact of the development.

- It was left to residents and property owners who have sufficient cyber skills to navigate the Applicant's website in an effort to gain a greater insight into the scope and impact of the project.

Furthermore, the fact is that the decision was to be made by SARA on 21 February 2020 to comply with the statutory timeframes and the first communication from the Applicant to the community was received on 6 February 2020. To make the timing even tighter, it was only revealed by SARA on 14 February 2020 that submissions had to be received at least several days before their decision day of 21 February 2020. This compressed timeframe did not afford a reasonable period of time to consider the legislation and the Applicant's application for the development, and assessment reports and to submit a proper and thorough submission. Notwithstanding our understanding from material on the Applicant's website suggests that work had been proceeding by the Applicant to put the development application together it seems since at least 2013, when a number of the initial assessments were first commissioned and reported on by the Applicant's parent company, CleanSight Pty Ltd (CleanSight).

C. Post Development Approval dated 21 February 2020

In the case of the Applicant, in their Forest Wind Newsletter #3 dated 14 May 2020 (**attached as Appendix B**), the Applicant announced the following:

1. Proposal for the Establishment of Forest Wind Community Consultative Committee

That it proposed to establish the Forest Wind Community Consultative Committee (FWCCC).

This is nearly some **six (6) months after the lodgement of their Development Application (DA) on 19 December 2019**.

In fact, notwithstanding that it appears that the project was in its preliminary stages in 2013, the Applicant discloses in section 1.12 of its EPBC Referral that it had undertaken 3 years of ecological surveys from 2016.

It is difficult to comprehend why the proposed FWCCC was not established, at the least back in 2016 when the key studies underpinning their EPBC Referral were being undertaken and the local residents could have been consulted, at the least for their input prior to the lodgement of the DA.

Whereas, now the local residents have been invited to a consultation body (FWCCC) some **six (6) months after the lodging of the DA on 19 December 2019**;

2. Lodgement of the EPBC Referral

That the Applicant has lodged its EPBC Referral on 13 May 2020. This means that in respect of the EPBC Referral, the local residents have been **informed one (1) day after its lodgement on 13 May 2020** by way of the newsletter dated 14 May 2020.

Yet back in 2016 when the key studies underpinning their EPBC Referral were being undertaken, the local residents could have been consulted, at the least for their input prior to the lodgement of the EPBC Referral.

(b) Approach to Community Engagement by the Coopers Gap Wind Farm

By way of contrast, the key dates, events and details in the community engagement process for obtaining the development approval for the project at Coopers Gap Wind Farm in Queensland are as follows:

(i) Establishment of the Coopers Gap Community Consultative Committee prior to the lodgement of their Development Application on 28 March 2017

- A. The establishment of the Community Consultative Committee- May 2012;**
- B. Coopers Gap Community Consultative Committee (CGCCC)-24 May 2012;
- C. Draft Criteria for Experts (Noise)-June 2012;
- D. Draft Updated Acoustic Report-6 June 2012;
- E. Summary Future eye Conclusions AGL-13 June 2012;
- F. CGCCC Meeting Presentation-14 June 2012;
- G. Presentation on Noise Report-July 2012;
- H. CGCCC Meeting Presentation-19 July 2012;
- I. Draft Terms of Reference-August 2012;
- J. Presentation on Noise Report-August 2012;
- K. CGCCC Meeting Presentation-16 August 2012;
- L. Electromagnetic Interference (EMI) Presentation-20 September 2012;
- M. Shadow Flicker Presentation -20 September 2012;
- N. Various CGCCC Meeting Presentations-15 November 2012 and 17 January and 21 February 2013;
- O. CGCCC Meeting Presentation-21 March 2013;
- P. Traffic Report Presentation- 22 March 2013;
- Q. Property Values Presentation- 20 June 2013;
- R. Various CGCCC Meeting Presentations-June 2013-May 2017;
- S. Application for the development approval-28 March 2017;**
- T. development approval granted on 12 June 2017;**
- U. Various CGCCC Meeting Presentations- August 2017 to March 2020.

Based upon the above timetable, the applicant for Coopers Gap Wind Farm had commenced engagement with the local residents in May 2012, some nearly **5 years prior** to the lodgement of the application for development approval on 28 March 2017, in particular on **key issues such as Noise/ Acoustics, EMI, Shadow Flicker, Traffic and Property Values throughout 2012 and 2013.**

Further, the applicant stated in its establishment of the Community Consultative Committee-May 2012, CGCCC stated the following:

"The aim of the CGCCC is to help strengthen the community engagement process so that any arising community issues can be appropriately addressed."

Of course, similar approaches and timelines for other Wind Farm projects in Queensland whereby there was extensive community consultation prior to issue of development applications can be provided of what is considered the **responsible and orthodox/ best practice approach** in obtaining development approvals for Wind Farms though no doubt SARA already had access to those details.

(ii) Coopers Gap Wind Farm Approval Process/EIS

A.Background

AGL (the owner of Coopers Gap Wind Farm) acquired the project from Investec Wind Holdings Pty Ltd, a subsidiary of Investec Bank Pty Ltd in December 2008. Prior to AGL acquiring the Project, Investec Wind Holdings Pty Ltd had commissioned a number of technical studies and investigations into the potential impacts of their project.

An Initial Assessment Report was released 24 March 2011 that collated the findings of a number of technical studies, including findings from the previous 2008 studies where relevant to their project at the time. The Initial Assessment Report identified an initial turbine layout and Project Site, and **provided an analysis of potential environmental impacts**

and mitigation measures to minimise or prevent those impacts. Consultation was subsequently undertaken in accordance with the Guidelines for Public Consultation Procedures for Designating Land for Community Infrastructure, **with submissions invited** on the content of the 2011 Initial Assessment Report.

Following the completion of the Initial Assessment Report submission period, **submissions from** Government agencies, stakeholders and **the public were received and informed the preparation of a Revised Assessment Report for the Project.** At this time, AGL decided not to progress the Revised Assessment Report for public consultation until a decision was made by the Australian Government on the Renewable Energy Target (RET).

In June 2015, a reduced 2020 large scale gigawatt hour (GWh) target of 33,000 GWh was legislated. The **project sought an assessment of the Environmental Impact Statement (EIS)** by the Coordinator-General under the Queensland State Development and Public Works Organisation Act 1971.

The Project was declared a 'coordinated project' by the Coordinator-General for which an EIS is required under section 26(1)(a) of the State Development and Public Works Organisation Act 1971.

The EIS had been prepared to:

1. consider the potential direct and indirect environmental, social, and economic impacts associated with the development and operation of their project. Mitigation measures were provided to avoid or minimise potential impacts to an acceptable level;
2. provide information for all stakeholders, relevant local governments and public sector entities, as well as other affected or interested bodies and/or parties.

B. Community Consultation

Community consultation and engagement was seen by AGL as a fundamental part of the planning process. Since becoming proponent of the Project in 2008, AGL had undertaken community consultation and engagement activities for their project in accordance with relevant guidelines and AGL's broader community engagement strategic approach.

The following consultation events and activities were undertaken:

1. Community information "drop-in" sessions;
2. Guided tour to an operational wind farm;
3. Establishment of a Community Consultative Committee with regular meetings to discuss the latest developments with the Project;
4. Community newsletters;
5. Individual discussions with nearby landowners (participating and non-participating)
6. Consultation with Western Downs and South Burnett Regional Councils
7. Consultation with State Government Agencies
8. Consultation with State and Federal members of parliament.

Community feedback from public consultation events informed the layout of their project and been considered within the technical assessments undertaken in their EIS.

(c) Approach by SARA to Community Consultation

Since the matter was assessed by SARA as being Code Assessable under the Planning Act, notwithstanding the significant impact on the local residents, their amenity of life and

property values, the local residents were not required to be consulted because there was no statutory requirement for community engagement.

However, the Environment Protection and Heritage Council, in its July 2010 National Wind Farm Development Draft Guidelines, set out clear principles for responsible wind farm development, including the requirement for a high level of transparency and responsiveness to community needs. Their guidelines highlight the importance of consultation commencing in the early stages in the development process, and for that consultation to be inclusive and to encompass all potential stakeholders.

In the absence of statutory regime requiring community engagement, there remains at the least, a reasonable expectation that the State of Queensland and the relevant state government agencies would require compliance by the Applicant with the 2010 National Wind Farm Development Draft Guidelines by way of a comprehensive consultation with stakeholders, in a timely manner, and across a range of information sources. In this way it would reflect an open and transparent process to ensure fairness, transparency and accountability similar to the approach used in the Coopers Gap Wind Farm project.

(d) Impact upon the Local Residents

As you may be aware, in the local area of the project, particularly at Boonooroo and Tuan there is an aged demographic of affected residents. Naturally, the older residents have contemplated that they would eventually sell their homes to fund the move in their later years into retirement villages, supported care facilities or nursing homes. In addition to the affect that the project will have upon their amenity of life, it will as a result of the DA and Project have economic consequences by affecting the value of their key financial asset (i.e. their homes) and their ability to have the means by which to afford buying into a retirement village, supported care facility or nursing home.

Further, the local residents have questioned why did SARA allow a project of this size and impact upon the local population and sensitive environment in a residential sea change region instead of some other low density place in a more remote region?

Fundamentally, it is incomprehensible to the local residents as **to how the State Government and SARA have allowed the approval process to proceed to a DA in the unorthodox manner** in which it did notwithstanding that there was a responsible and orthodox/ best practice approach in obtaining development approvals for Wind Farms pursuant to 2010 National Wind Farm Development Draft Guidelines which was a fair, transparent and accountable process.

Now through the Forest Wind Newsletter #3 dated 14 May 2020, the Applicant has informed the local residents that they have lodged an EPBC Referral for the Project in accordance with the EPBC Act and that it is open for public consultation with a closing date of 27 May 2020 which gave them a mere 14 days to respond.

Furthermore, even though it would be difficult to organise any public meetings due to COVID-19, it was incomprehensible why online video conferences for Project Information Sessions could be organised for subcontractors and prospective suppliers for the Project (on 3 separate occasions) yet this tool was not offered to the local residents to inform, and consult with them regarding the details of the EPBC Referral. Please see the Forest Wind Newsletter #3 dated 14 May 2020 (**attached as Appendix B**).

Obviously, this is patently unfair when it is considered that the Applicant discloses in section 1.12 of the EPBC Referral that it had undertaken three (3) years of ecological surveys from 2016, and the local residents could have been consulted for their input prior to the lodgement of the EPBC Referral.

Conclusion

In conclusion, this project and the Bill must be “parked” to facilitate appropriate community engagement by the Applicant and the State. Each must engage in good faith, genuine, open and detailed information-sharing in order to design meaningful mitigation measures in the interests of the community balanced against the business needs of the project. This engagement must take place over a reasonable timeframe along the lines of what occurred in the Coopers Gap Wind Farm project. In addition, the methods of engagement must take account of COVID-19 safety requirements and respect and address the needs of elderly community members.

[REDACTED]

[REDACTED]

BURRUM
Box 61212



Forest Wind

14 January 2020

Dear Resident/landowner

Forest Wind – Invitation to attend information sessions

I am writing to you on behalf of Forest Wind Holdings, the proponent of a proposed wind farm project in the Wide Bay region.

The project, named Forest Wind, is a potential \$2 billion investment in energy infrastructure that can benefit regional Queensland. Potentially up to 200 wind turbines are designed to be embedded within the pine plantations of Toolara, Tuan and Neerdie State Forests, between Gympie and Maryborough. The site has been selected and designed to minimise impacts on the community, demonstrated by a buffer of 3,000m between the closest turbines and private residents.

Forest Wind has the potential to create hundreds of jobs during construction, in our region, and sustain a long-term operations and maintenance work force. It will boost the local economy and provide opportunities for businesses. Forest Wind will also contribute to a sustainable electricity supply for Queensland that puts downward pressure on wholesale electricity prices.

Should you seek further information and/ or wish to meet with us, we will be hosting local community information sessions for residents, local forestry workers and other interested parties as follows:

- Saturday, 8th February, 9:00-11:00AM, at Kia Ora Public Memorial Hall, 10 Johnson Road, Kia Ora
- Saturday, 8th February, 2:00-4:00PM, at Tinana Hall, 84 Gympie Road, Tinana
- Sunday, 9th February, 9:00-11:00AM, at Poona Centenary Hall, 7 Snapper Drive, Poona.

Details of the project and associated feasibility assessments will also be available at www.forestwind.com.au. Direct feedback may be provided at this website or via email at info@forestwind.com.au. If you have further queries you are welcome to phone our office on 07 5447 1472.

We hope these information sessions provide an opportunity for you to engage with us, or otherwise welcome alternative means of communication. We look forward to meeting you at one of our community events.

Yours sincerely

Jane Daniels
Stakeholder and Community Engagement Manager
Forest Wind
E: info@forestwind.com.au





Forest Wind

Project Overview

Forest Wind is a major clean energy project proposal in Wide Bay, Queensland



About Forest Wind



Introduction

Forest Wind is a wind farm project proposal. We are seeking to develop and construct a site that can host up to 226 turbines, generating up to 1200MW of clean energy. Forest Wind will connect to the existing substation at Woolooga, a major distribution point in the south-east Queensland electricity network.

Forest Wind offers a unique combination of being a valuable wind resource that can be captured at scale with a large number of turbines, whilst having a low impact on communities and the environment.

Fully constructed, Forest Wind will be a cornerstone of Australia's clean energy future.

Location

Forest Wind's location has been carefully selected to avoid or largely mitigate potential community impacts from the wind farm, including on landscape, ecology and acoustic amenity.

Forest Wind will be located within a large pine plantation (65km x 30km) between Maryborough and Gympie. The dense pine forest will provide a natural buffer between turbines and local residences.

The proposed 3km separation distance from residents to wind turbines is world leading, and double the distance required by the Queensland regulation.

Clean energy generation

Forest Wind has the capacity to produce enough energy to supply one in four Queensland homes with wind blowing in from the Pacific Ocean.

At full capacity, Forest Wind will:

- put downward pressure on electricity prices in Queensland
- contribute 1/4 of new generation to meet Queensland's renewable energy target
- contribute 1/10 of Australia's Renewable Energy Target
- offset greenhouse gas emissions by 2.62 million tCO₂e each year.

Community engagement

Forest Wind's vision is to create a transformative clean energy project that benefits the economy, the local forestry industry, Traditional Owners, the environment and the local community.

We will work with the Gympie Regional Council and the Fraser Coast Regional Council, the Queensland Government and local community groups to identify how the Project can support local plans and initiatives through:

- local employment and industry participation
- partnerships with training institutes
- education resources for schools.

Local jobs and industry

Forest Wind will create:

- hundreds of full-time jobs in the construction phase over three years
- long-term operations roles for a 30-year period
- hundreds of indirect jobs.

During construction, local material resources, including sand, rock and road materials will be required. Earthmovers, concreters, electrical and mechanical fitters, crane operators, engineering, project managers and administrative staff will also be required.

During operations, civil, mechanical, electrical, administrative and service roles will also be required for 30 years.

Over the life of the project, indirect jobs in a range of support services will be created.

First Nations People

We acknowledge the Butchulla and Kabi Kabi First Nation People and their Native Title claims on the land on which Forest Wind is proposed.

Engagement with Butchulla and Kabi Kabi First Nation People about land use is underway and we look forward to developing partnerships to maximise indigenous employment, cultural heritage protection and promotion.

Planning approval process for Forest Wind

Forest Wind Holdings Pty Limited has submitted a development application for the Project to the Queensland State Government. The development application will be assessed against the State's code for wind farm development. The purpose of the code is to protect people, communities and the environment from adverse impacts as a result of the construction, operations and decommissioning of wind farm developments.

The code is the result of an expert advisory group's review of recent and emerging research, and national and international best practice, as well as extensive public consultation that generated 160 submissions.

To support Forest Wind's development application, detailed technical assessments, including noise, ecology, heritage, landscape, aviation, transport and construction have been undertaken to demonstrate Forest Wind's compliance with the code. Key outcomes are summarised here, and the full reports are available on our website. News on progress of our development application will also be posted on the website.



Landscape

Forest Wind has been designed to avoid or minimise impacts on landscape and scenic amenity. Views from homes are limited and the region's landscape values will be protected.



Separation distances

Turbines will be set well back from houses and situated at least 3km from nearby residences—that's twice the distance required by the State code for wind farm development.



Flora and fauna

Forest Wind's proposed location within an exotic pine plantation means the impact on local ecology is minimal. In accordance with the State code for wind farms, the design, construction and operation will also ensure that impacts are avoided, or minimised and mitigated.



Acoustic amenity

With a separation distance of 3km from turbines to residences, any noise generated by the turbines will not be audible by households. The noise impact assessment confirms that turbine noise complies with requirements of the State code for wind farm development.



Electromagnetic interference

Forest Wind's turbines will be situated to avoid or minimise and mitigate electromagnetic interference. This means Forest Wind will have no impact on your TV, radar, and radio transmission and reception.



Aviation

Forest Wind will be designed to ensure it does not interfere with aviation operation and safety in the area. There will be no adverse impact on aircraft and their ability to take off, fly and land safely.



Construction management

Forest Wind's construction will be planned to avoid, or minimise and mitigate any adverse impacts on environment, water quality, water courses, amenity and local transport networks, and road infrastructure. During development we will also regularly keep the community notified of planned and actual works.



Shadow flicker

Due to the 3km separation distance from turbines to residences, Forest Wind shadow flicker complies with requirements of the State code for wind farm development.



Traffic access

During construction and operations, Forest Wind will ensure safe traffic access for vehicles entering/exiting the site.



Forest Wind

Who are we?

Forest Wind is a joint venture between CleanSight and Siemens. The development of Forest Wind is being managed by CleanSight.

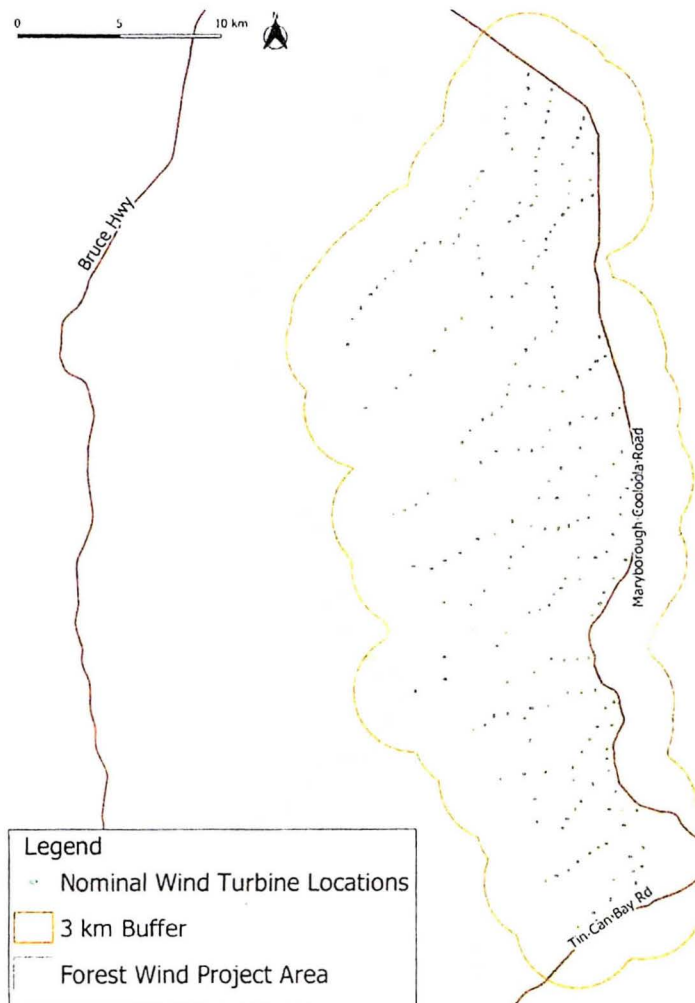
CleanSight is a Queensland-based renewable energy company. Established in 2010, CleanSight is owned by Queenslanders who have extensive international experience developing renewable energy projects and operating in international energy markets.

Find out more and have your say

Visit our website: www.forestwind.com.au

- Register your company's interest by completing our business supplier registration form
- Subscribe to our newsletter
- Have your say and complete our online feedback form.

Proposed nominal turbine locations in pine plantation



Contact us:

Email: info@forestwind.com.au

www.forestwind.com.au

Phone: (07) 5447 1472



Forest Wind

Forest Wind Newsletter #3

14 May 2020

Welcome to the third Forest Wind newsletter.

COVID-19 update

Like all businesses and communities, we have had to make adjustments to our plans and activities during this period.

The restrictions have impacted upon our ability to conduct face-to-face meetings and our planned community engagement activities. Our trip to Coopers Gap Wind Farm, for example, has been postponed until conditions allow.

However, we are pursuing a number of activities online to maintain engagement and in this newsletter you can find out more about these events and initiatives and how you can get involved.

We hope everyone has remained safe and well during this challenging time and we look forward to recommencing in person engagement as soon as we can.

In the meantime, we are always available via phone or email to respond to your queries.

Forest Wind now has its own Project page on the Industry Capability Network (ICN) Gateway.

The ICN Gateway is an independent business network providing an online tool to connect subcontractors and prospective suppliers with projects.

You can register your company's details and submit an Expression of Interest via the Forest Wind Industry ICN Gateway Project page [here](#).

Together with Siemens Gamesa (our EPC Partner) and the ICN Gateway Team, we are conducting Project Information Sessions about Forest Wind for prospective suppliers.

With restrictions in place for social gatherings and events, we have decided to go ahead with our first set of Project Information Sessions for Suppliers via an online video conference.

Session dates and times are:

Session 1: [Tuesday 19 May 2020](#) 11:00am to 12:30pm

Session 2: [Thursday 21 May 2020](#) 09:00am to 10:30am

Session 3: [Monday 25 May 2020](#) 04:00pm to 05:30pm

For more information and registration details, please click [here](#).

When conditions permit, we will also conduct Project Information Sessions with local suppliers, providing networking opportunities and support for businesses to complete their Expression of Interests.

Forest Wind Community Consultation
Information for the public



We propose to establish the Forest Wind Community Consultative Committee (FWCCC).

The purpose of the FWCCC will be to provide a forum for discussion between the Forest Wind Project Team and representatives of the community, First Nations People, stakeholder groups such as local businesses, forestry, resident groups and associations, environment groups and the local councils on issues directly relating to the Project.

Specifically, the purpose of the committee is to:

- Establish good working relationships and promote information sharing between FWCCC, local community, local councils, First Nations People and stakeholder groups (such as environment, residents, business/ commerce associations).
- Allow the Forest Wind Project Team to keep the community informed about Forest Wind, seek community views and respond to matters raised by the community.
- Allow community members to seek information from the Forest Wind Project Team and provide feedback on Forest Wind to assist with the delivery of balanced social, environmental and economic outcomes for the community.
- To perform an advisory and consultative role, rather than regulatory body.

Forest Wind is calling for nominations from local community representatives and representatives from local stakeholder groups to become a member of the FWCCC.

The FWCCC Terms of Reference and nomination forms can be downloaded from our website at www.forestwind.com.au/community-consultative-committee

Nominations close 5pm on 19 June 2020

Please get in touch via info@forestwind.com.au if you have any questions about the proposed committee or nomination and selection process.



EPBC Referral Public Consultation Period

Forest Wind Holdings Pty Limited has lodged a Referral for the Project in accordance with the *Environment Protection and Biodiversity Act 1999* (EPBC Act 1999).

13/5/2020

The Referral is now available for public consultation, with a closing date of 27/05/2020 at 5pm.

The Referral documentation can be found at <http://epbcnotices.environment.gov.au/invitations/>. Please use reference number 2020/8636. All submissions are to be made directly to the Department of Agriculture, Water and the Environment.

We have also made all of the documentation available on our website at www.forestwind.com.au/epbc.

If you have any questions in relation to the documentation please do not hesitate to contact us.

The developers of Forest Wind respectfully acknowledge the Butchulla First Nation and Kabi Kabi First Nation People of the land on which Forest Wind is proposed. We are consulting

with the Butchulla and Kabi Kabi First Nation representatives on land use and we look forward to future partnerships through which employment and training, business development and contracting opportunities, cultural heritage protection and environmental management may be pursued.

Are you a Kabi Kabi or Butchulla business interested in work opportunities on Forest Wind? Please get in touch via email info@forestwind.com.au

Want to know more?

Visit our [website](#) for more information

Forest Wind

Forest Wind Holdings Pty Ltd, PO Box 1613 , Noosaville, 4566, Australia

[Unsubscribe](#)

Powered by [Squarespace](#)