



SARA reference: 2112-26517 SDA

Applicant reference:

24 February 2022

Chalumbin Wind Farm Pty Ltd  
 C/-Attexo  
 Wickham Street, Ground Floor, 108  
 FORTITUDE VALLEY QLD 4006  
[chris.cantwell@attexo.com.au](mailto:chris.cantwell@attexo.com.au)

Attention: Mr Chris Cantwell

Dear Mr Cantwell

## SARA advice notice – Chalumbin Wind Farm

(Advice notice given under section 35 of the Development Assessment Rules)

The State Assessment and Referral Agency (SARA) advises that your development application has not adequately demonstrated compliance with the State Development Assessment Provisions (SDAP).

SARA has reviewed your application material and in conjunction with the information request issued on 14 February 2022, and as indicated in the phone conversation with you on 24 February 2022, the following issues with the proposed development have been identified:

| <b>SDAP State code 16: <i>Clearing native vegetation</i></b> |  |
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| 1.   | <p><b><u>Issue</u></b></p> <p>The Ecology Assessment Report (EAR) Figures 6-1: Sheets 1 - 8 show the Ground Truthed Regional Ecosystems within the Project Area, including the Project Footprint (areas of disturbance).</p> <p>The ecological survey on which these plans are based has not been provided.</p> <p><b><u>Action</u></b></p> <p>To enable an assessment of the proposal against PO23 of State code 16 based on the Ground Truthed Regional Ecosystems, provide the following:</p> <ul style="list-style-type: none"> <li>• the data obtained during the ecological survey, including on-ground photos and/or transect data</li> <li>• a kml/shapefile of the updated regional ecosystem mapping.</li> </ul> <p><b><u>Note</u></b></p> |

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|  | If this information is not provided or the data is insufficient to change the mapped regional ecosystems, the assessment will use the regional ecosystems mapped within the Vegetation Management Regional Ecosystem Map version 12.0.   |
| <b>SDAP State code 23: Wind farm development</b> |  |
| <b>Flora and fauna</b>                           |  |
| 2.   | <p><b><u>Issue</u></b><br/>The species database search undertaken to inform the EAR occurred in May 2021, more than six months prior to the submission of the EAR. Species status may have changed during this time. As an example, the Greater Glider is now listed as endangered, as of November 2021.</p> <p><b><u>Action</u></b><br/>Provide an updated EAR based on current species database searches.</p>  |
| 3.   | <p><b><u>Issue</u></b><br/>A review of the Bird Utilisation Survey (BUS) effort within the EAR has identified the following inconsistencies:</p> <ul style="list-style-type: none"> <li>• 28 person hours repeated over 2 seasons (assumed 56 hours total) on page 46</li> <li>• 180 person hours on page 49</li> <li>• 20-minute surveys repeated once in the morning and once in the afternoon for each turbine location. It is unclear if this was repeated on additional days to account for the total survey time of 1680 minutes.</li> </ul> <p><b><u>Action</u></b><br/>Provide an updated EAR to clarify the BUS effort.</p>   |
| 4.   | <p><b><u>Issue</u></b><br/>The preliminary Bird and Bat Management Plan within the EAR does not include sufficient information to undertake a detailed assessment.</p> <p><b><u>Action</u></b><br/>Provide an updated Bird and Bat Management Plan which includes the following:</p> <ul style="list-style-type: none"> <li>• a summary of the operational risk to bird and bat</li> <li>• information to demonstrate whether collision risk modelling is appropriate</li> <li>• information to qualify when low wind speed curtailment or turbine shut down is an appropriate mitigation.</li> </ul>  |
| 5.   | <p><b><u>Issue</u></b><br/>The submitted EAR does not provide sufficient assessment of impacts to the Greater Glider.</p> <p><b><u>Action</u></b><br/>Provide an updated EAR including the following:</p> <ul style="list-style-type: none"> <li>• the description of suitable habitats as 'large' hollows, including what quantifies as a large hollow and provide supporting information/evidence for any conclusions</li> <li>• supporting evidence to verify the assumption that trees less than 20m in height will not support hollows for Greater Glider and that preferred habitat is within 50m of a mapped watercourse</li> <li>• clarification when wildlife crossing infrastructure will be installed, noting that the EAR acknowledges clearing less than 100m wide will likely act as a barrier to this species</li> <li>• inclusion and consideration of wildlife crossings as a species-specific measure for</li> </ul> |

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|                         | the Greater Glider.  |
| 6.                      | <p><b><u>Issue</u></b><br/>The submitted EAR in Table 5.4 identifies that koalas were recorded in the study area, however, they have not been identified on Figure 5.4 – Threatened Fauna Records within the Study Area.</p> <p>The EAR also does not identify which diverse, densely structure Eucalypt communities were identified as preferred habitat for koalas in Section 8.4 / Figure 8.4 – Koala Habitat.</p> <p><b><u>Action</u></b><br/>Provide an updated EAR:</p> <ul style="list-style-type: none"> <li>- showing in Figure 5.4 the locations koalas were identified within the study</li> <li>- amending Section 8.4 and Figure 8.4 to identify diverse, densely structured Eucalypt communities within the Project Area.</li> </ul>   |
| 7.                      | <p><b><u>Issue</u></b><br/>No supporting information, including habitat mapping has been provided for the Lumholtz tree-kangaroo.</p> <p><b><u>Action</u></b><br/>Provide supporting information and updated habitat mapping for the Lumholtz tree-kangaroo.</p>   |
| <b>Acoustic amenity</b> |  |
| 8.                      | <p><b><u>Issue</u></b><br/>The following issues have been identified with the submitted Noise Impact Assessment (NIA) report:</p> <ul style="list-style-type: none"> <li>• wind data was measured during the monitoring period and sheared up to a height of 150m above ground level. No further details have been provided regarding the location or type of wind monitoring undertaken and wind monitoring heights</li> <li>• the photographs provided of equipment in-situ are from a single direction only. It is not possible to identify the monitoring equipment in relation to the surroundings</li> <li>• background noise monitoring was completed at a single location (Host Lot on the Doyle property). The assessment justifies this due to the sparsely located sensitive land uses and the distance to these land uses being sufficient to characterise the existing noise environment. This is might be acceptable for HLK &amp; NHL2, however, NHL3 is likely to have differing background noise levels being positioned on an exposed ridgeline and bush setting as opposed to a cleared river valley. Noting that the highest predicted noise level at NHL3 of 32 dBA is below the minimum 35 dBA criteria, therefore its compliance is not contingent upon background noise level</li> <li>• rainfall data was obtained from the nearest Bureau of Meteorology weather station, at Mareeba. The data has been used to exclude periods when local weather may have adversely affected the background noise measurement data. Mareeba is approximately 80 km from the baseline noise monitoring location and hence it is unlikely to be representative of local rainfall conditions. It is considered best practice to deploy a local weather station capable of measuring both local wind conditions as well as local rainfall</li> </ul> |

- the noise monitoring data is presented as a regression only, the assessment should provide a time history of the noise monitoring data for context as it is not possible to ascertain if data includes extraneous noise sources
- there is no evaluation of the typical ambient noise environment (e.g. wind in trees & foliage, insects, birds, frogs, domestic sources etc.)
- the assessment describes that data points corresponding to any periods of measured rainfall and/or measured wind speed exceeding 5 m/s at the microphone for more than 90% of the measurement period. Whilst most standards are not prescriptive, it is more typical to apply a threshold of 5 m/s average wind speed (e.g. 50% of the measurement period)
- the assessment derives criteria based entirely upon the background noise regression curves, which are particularly high due to what is presumed “non-wind related noise sources”. The resulting night-time criteria are typically >40 dBA which is higher than the minimum applicable for host lots. In light of the potential variability of these “non-wind related noise sources” the monitoring and/or analysis should remove such influence, or alternatively, the minimum noise criteria of 37 dBA (day) and 35 dBA (night) should be applied
- the predictions are based on sound power levels of a Vestas V162 6.0MW. The evaluation does not include the potential for Special Audible Character. Typically, it is best practice to evaluate for the potential for tonality based upon narrow band analysis in accordance with IEC61400-11. If a penalizable tone is present then that should be ‘built in’ to the wind farm noise prediction.

#### **Action**

Provide an updated NIA report that addresses / includes the following:

- details of the location and type of wind monitoring undertaken and wind monitoring heights
- additional photographs of the equipment in-situ from alternate / multiple directions
- background noise monitoring for NHL3
- use of a local weather station to measure local wind conditions and rainfall for use in that data analysis
- a time history of the noise monitoring data
- an evaluation of the typical ambient noise environment
- apply a threshold of 5 m/s average wind speed (e.g. 50% of the measurement period) to the data points for any periods of measured rainfall and/or measured wind speed exceeding 5 m/s at the microphone
- monitoring and/or analysis should remove non-wind related noise sources or alternatively, the minimum noise criteria of 37 dBA (day) and 35 dBA (night) should be applied
- if present include penalizable tone into the wind farm noise prediction.

| Third Party Advice – Powerlink |   |
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|                                | <p>Powerlink requires a separation distance between the centre of the turbine / MetMast to the edge of the easement to be greater than the height of the turbine / MetMast between the ground and the highest point on the turbine / MetMast.</p> <ul style="list-style-type: none"> <li>- The location of wind turbine 48 is approximately 235m from the centre of the turbine edge of the easement. As the overall height of the turbine is 250m, the separation requirement cannot be met.</li> <li>- The location of MetMast8 is approximately 25m from the edge of the easement. As the overall height of the mast is 170m, the separation requirement cannot be met.</li> </ul> |

**Please note that unlike an information request, assessment timeframes do not stop when advice is provided by SARA.**

### How to respond

It is recommended that you address these issues promptly and provide a response to SARA by 16 May 2022. If you decide not to respond, your application will be assessed and decided based on the information provided to date.

Under the [Development Assessment Rules](#) (DA Rules), the issuing of advice does not stop the assessment timeframes. If you intend to provide additional information, it should be provided in a timely manner to allow sufficient time for the information to be considered. As such, you are strongly encouraged to consider using the 'stop the clock' provisions under s32 of the DA rules, to allow sufficient time for you to consider and respond to SARA's advice; and for SARA to consider any new or changed material provided.

If you wish to utilise the 'stop the clock' provisions, you should give notice to the assessing authority (assessment manager or referral agency) whose current period you wish to stop. This can be done through MyDAS2 or via correspondence.

You are requested to upload your response and complete the relevant tasks in [MyDAS2](#).

If you require further information or have any questions about the above, please contact John Irving, Principal Planner on 4758 3421 or via email [DAAT@dasilgp.qld.gov.au](mailto:DAAT@dasilgp.qld.gov.au) who will be pleased to assist.

Yours sincerely



Steve Conner  
Executive Director

| Development details  |  |
|----------------------|--|
| Description:         | <p>Development permit</p> <p>Material change of use for Wind farm (94 turbines, weather monitoring, substations and associated infrastructure)</p> <p>Operational work for Clearing native vegetation</p>  |
| SARA role:           | Assessment manager   |
| SARA trigger:        | <ul style="list-style-type: none"> <li>• Part 4, Division 2, s21, Item 2.b (4.2.21.2.b) – Material change of Use for a Wind farm (Planning Act 2016)</li> <li>• Schedule 8, Table 4, Item 3.b (8.4.3.b) - Operational work that is the clearing of native vegetation (Planning Regulation 2017)</li> </ul> |
| SARA reference:      | 2112-26517 SDA   |
| Assessment criteria: | <p>State Development Assessment Provisions:</p> <ul style="list-style-type: none"> <li>• State code 16: Clearing native vegetation</li> <li>• State code 23: Wind farm development</li> </ul>  |