Matt Lachlan
PO BOX 874
Malanda QLD 4885

15th July 2022

Christopher Aston
QLD Government
Dept of State Development, Infrastructure, Local Govt & Planning
1 William Street
Brisbane QLD 4000

Dear Mr Aston

I acknowledge receipt of your letter dated 4th July in relation to the QLD state government approval of Chalumbin Wind Farm under the State Assessment & Referral Agency (SARA) process.

I would like to respond to a number of points you raised in your letter, including your statement that, *'SARA gave careful consideration to the issues raised by those who commented on the application.'*

Public submissions and comments were not accepted as part of the state approval process for Chalumbin. Under section 23 (material change of use [MCOU]), there was no requirement for community engagement regarding the development application. There was no mechanism through which public comments and submissions could be made. With this in mind I ask, how could SARA have given *'careful consideration'* to *'issues raised by those who commented,'* when there was no mechanism within the process for issues to be raised / comments to be submitted?

How is it that an Industrial scale Wind Farm development can be exempt from the standards of the Material Change of Use process that other businesses and industries must comply with in order to gain approval?

It is of great concern, that an industrial development of this size bordering the WTWHA, could be approved via such a limited assessment field in an opaque process. How can a development that will lead to the destruction of habitat 'critical to the survival' of multiple vulnerable and endangered species, bypass the state Environment Department? With the QREZ mapping not completed, the question needs to be asked: why was this development in a high biodiversity area, with headwaters that ultimately flow to the Great Barrier Reef, *even assessed* at this point, let alone rubber stamped and approved?

You outline that approval *'conditions require specific measures to rehabilitate waterways and habitats for endangered and vulnerable species.'* One must ask how it can be deemed acceptable, to destroy habitats for endangered species bordering the WTWHA. No amount of *'rehabilitation'* will counter-act the devastating impacts this development will have on the environment.

I note approval has also been given under section 16 to authorise the clearing of 2797 acres of 95% remnant vegetation. With deforestation a leading cause of climate change, and with high altitude areas like this providing critical refuges in a warming environment, this approval lacks all environmental credibility.

The development has been approved within just 600m of the WTWHA boundary to *"mitigate any potential direct impacts on this area".* It defies logic that such a small buffer would be deemed acceptable between an area of global significance and this development. Indeed section 23, P10 states a minimum distance of 1500m between turbines and sensitive land uses. The public may be alarmed to learn that ANY direct impacts are regarded as acceptable, let alone justifiable through mitigation. Further, the public should be informed on what (if anything) has been done to address the indirect impacts on the WTWHA, including on wildlife corridors not defined by WTWHA boundaries.

You state, '*In this instance due to the ecological value of this site the proponent has modified the project to reduce in size by 50% to avoid areas of highest ecological significance."*
Despite this claim being constantly repeated in the developer's spin documents, the fact is this development has been reduced by one turbine from 95 to 94, as per the signed submissions to both the state and federal approval processes. (EPBC Act Referral signed 8th July 2021, and state application signed 13th Dec 2021). Why are you providing misleading information that the development size has been reduced by 50% when this is clearly incorrect?

"The site location and selection is proponent led, with wind resource, access and proximity to transmission lines being key considerations."
Whilst there is no doubt this development site was selected by the developer, in order to maximise profit, it is up to our elected government to act in the best interests of their constituents, and not a foreign owned multi-national corporation.

An industrial wind turbine MCOU application should be subject to the same minimum level of assessment scrutiny as any other development. The SARA approval process for Chalumbin was flawed, with narrow parameters, and insufficient legislative frameworks to adequately assess the development. Legislation must be strengthened to have the necessary protections in place to ensure unsuitable developments can be rejected, and not simply mitigated as per section 23.

The scope of the development application assessable under SARA needs to be widened, so that an industrial development is properly assessed with regards to all impacts. The lack of community engagement is not in the public interest, and flies in the face of transparency, and accountability. Widespread community consultation should be a prerequisite to a development application being assessed. The implementation of legislation, enabling stakeholders to make submissions as part of the process is critical. The consideration of submissions should then form a key component of the assessment process.

It is in the public interest for the QLD government to ensure that any proposal is assessed in a wide-ranging, vigorous, and comprehensive manner to ensure best practice. This is essential to ensure the best interests of the community, environment and future generations are met. This has clearly not been the case with this development.

Sincerely

Matt Lachlan