Queensland Conservation Council

PROTECT CONSERVE SUSTAIN

The Honourable Steven Miles
Deputy Premier, Minister for State Development, Infrastructure, Local Government and Planning
8 May 2023

Dear Minister Miles,

We are writing to request an urgent acceleration of the planning reforms needed for the roll out of renewable energy in Queensland.

We warmly welcomed the 2022 Queensland Energy and Jobs Plan as a significant milestone in Queensland's emissions reduction journey. Building the infrastructure in the Plan would open up huge opportunities for Queensland to decarbonise not just our electricity but also transport, industrial processes and heating, and start exporting clean energy to the world. We are now looking forward to working with your Government to deliver the Plan.

We are very concerned that the renewable energy build in Queensland is at risk of losing social licence because our planning frameworks are not currently capable of protecting communities, cultural heritage and nature.

We urge you to direct your Planning department to accelerate their involvement in renewable energy, through:

- **publicly announcing the terms and timeline of the planning review framework**
- **prioritising amendment of State Code 23 to improve environmental and community outcomes**
- **Implementing a State Code for the assessment of solar farms.**

Renewable energy projects currently approved or undergoing assessment under the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) are threatening nearly 15,000 hectares of remnant vegetation in Queensland, including more than 1,000 hectares of habitat for each of 12 threatened species, and nearly 9,000 hectares of koala habitat.

These projects combined are 10 GW of renewable capacity, which is less than half the 25 GW expected by 2035 in the Queensland Energy and Jobs Plan.

These projects are often not required to undertake community consultation during planning assessments nor thorough state environmental assessment under our current planning frameworks.

The Queensland Energy and Jobs Plan released in September 2022, recognised the need to review the planning framework through Action 3.6. We call on you to publicly announce the

scope of this review, the level of community consultation expected and the timeframe in which it will be completed.

Our asks of this planning review are:

1. Urgently amend the State Code 23 for wind farms to:
    a. expand the definition of a 'sensitive site' which requires a buffer zone to also include National Parks and World Heritage Areas.
    b. include the Department of Environment and Science (DES) as a Referral Agency with concurrence power for new wind farm applications.
    c. Require a community consultation plan, with a focus on Traditional Owner engagement, and a social impact assessment to be completed as part of the development application
2. Carry out a consultation process to develop prescribed outcomes which will better protect biodiversity through:
    a. Assessing cumulative impacts, for example, by setting a maximum impact on threatened species at a regional level
    b. Protecting threatened species and ecosystems, for example, by defining critical habitat that is not able to be cleared for wind farms
    c. Setting operational conditions, for example, to minimise bird and bat fatalities
3. Develop a State Code for solar farms with clear enforceable criteria, in line with changes to the wind code, to improve environmental protection, social licence and regulation of how and where this industry will operate in future

These are the critical updates to the planning regulations needed to enable the renewable energy rollout in Queensland in the short term.

In the longer term, we call on you as Planning Minister to ensure that the updated Queensland regional plans include strategic land use mapping to identify areas of high environmental significance which are unsuitable for renewable energy development. These should work closely with the Federal Government bioregional plans being developed under the Nature Positive Plans for EPBC Act reform.

We would welcome the opportunity to meet with you to discuss these concerns at your earliest convenience.

Yours sincerely,

Dave Copeman
Director,
Queensland Conservation Council

Queensland Conservation Council

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On behalf of

Capricorn Conservation Council

cfnec CAIRNS AND FAR NORTH ENVIRONMENT CENTRE

Wide Bay Burnett Environment Council

Protecting the Region's Biodiversity for the Future

Queensland Conservation Council