

4 September 2023

Hon. Dr Steven Miles
Deputy Premier
Minister for State Development, Infrastructure, Local Government and Planning
Minister Assisting the Premier on Olympic and Paralympic Games Infrastructure
Queensland Government
Lodged on the Queensland Government website

Dear Minister,

Response to the proposed updates to State code 23: Wind farm development and the associated planning guidance.

The Clean Energy Investor Group (CEIG) welcomes the opportunity to provide feedback to the Queensland Government on the *proposed updates to State code 23: Wind farm development and the associated planning guidance (updates to State code 23)* published on 7 August 2023;

CEIG represents domestic and global renewable energy developers and investors, with more than 16GW of renewable energy capacity in the NEM across more than 76 power stations and a combined portfolio value of more than \$38 billion. CEIG members' project pipeline is estimated to be more than 46GW across Australia. CEIG strongly advocates for an efficient transition to a clean energy system from the perspective of the stakeholders who will provide the low-cost capital needed to achieve it.

KEY POINTS

- CEIG commends the Queensland Government for its progressive revisions to guidelines, capturing emerging technology and knowledge, which not only enhance industry standards but also environmental and social outcomes.
- The proposed changes provide clarity and specificity, ensuring projects are environmentally robust and socially responsible.
- CEIG recognises that comprehensive assessments lower the risk of unexpected environmental consequences, promoting long-term sustainability and stakeholder trust.
- However, increased assessments might result in extended approval times, posing challenges for project timelines, costs, and investor confidence.
- It is therefore important for the Queensland Government to allocate sufficient trained professionals and funding to prevent potential delays in the assessment process.

- CEIG encourages further consideration of the extent to which the additional requirements proposed interact with, or are able to be coordinated through, the proposed QREZ framework.
- Finally, there is a need for a clearer definition of the terms 'areas of high environmental value' and 'high scenic amenity' to ensure consistency and investor certainty.

CEIG commends the Queensland Government for revising guidelines based on acquired experience and the emergence of new information and technology. In this instance, the update not only elevates the industry's standards but also enhance environmental outcomes and strengthen the social licence. This approach assures the public, developers, and stakeholders that the energy transition is rolled out in line with the best available knowledge and practices.

The proposed updates to State Code 23 introduce several additional assessments and early works requirements. The enhanced clarity and specificity provided by these guidelines should reduce uncertainties and ensure that projects are more environmentally and socially sound.

Furthermore, with detailed assessments, the likelihood of unanticipated environmental impacts diminishes, ensuring long-term sustainability. Ultimately, this enhances stakeholder confidence where the rigorous guidelines can lead to increased confidence among local communities, investors, and other stakeholders, fostering collaborative relationships.

However, with more assessments to be undertaken, there is potential for prolonged approval times, which may impact project timelines. This uncertainty can deter stakeholders, increase costs, and introduce complication in contractual obligations which may be a deterrent for investors.

To address this challenge, the Queensland Government would need to adequately resource these assessments. By ensuring that there are enough trained professionals, and necessary funding dedicated to the assessment process, the likelihood of delays can be significantly reduced.

As such, we would like to ensure that the Queensland Government is mindful of these impacts on wind farms developers, the approvals process should be streamlined where possible and adequately resourced so as there are no delays in the energy transition.

Considering the additional requirements relating to construction management, workforce accommodation and transport networks, these are activities that can have an amplified impact when multiple projects are in the same area, such as in a REZ. CEIG encourages further consideration of the extent to which these requirements interact with, or are able to be coordinated through, the proposed QREZ framework.

There appears to be some overlap with the proposed purpose of the REZ Readiness Assessment in its strategic assessment of how to best capitalise on REZ development including transport and road planning, regional plans, housing and other planning processes. CEIG encourages close engagement with developers and SARA as part of REZ Readiness Assessments to help identify opportunities for coordinated approaches to planning transport networks and worker accommodation.

Finally, CEIG would like to note that the terms 'areas of high environmental value' and 'high scenic amenity' are currently ambiguous as it is neither defined in the proposed Code or the Guidance. The lack of a clear definition of these terms, combined with the absence of 'areas of high environmental value' in other Queensland legislation, raises concerns about potential inconsistencies in interpretation. To provide investors with certainty, CEIG are requesting a more detailed explanation or definition of these terms.

CEIG thanks the Queensland Government for the opportunity to provide feedback on the updates to State code 23 and looks forward to continued engagement. Our Policy Director Ms. Marilyne Crestias can be contacted at marilyne.crestias@ceig.org.au if you would like to further discuss any elements of this submission.

Yours sincerely,



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