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**DATE**  
7 April 2026

**SUBJECT**  
Applicant response to SARA's Information Request  
Notice for the Dugald River Wind Farm Project

**REFERENCE**  
SARA Reference: 2510-48813 SDA  
ERM Reference: 0745548

Dear Brendan,

Environmental Resources Management Australia Pty Ltd (ERM) writes to the State Assessment Referral Agency (SARA) on behalf of MMG Dugald River Pty Ltd (MMG) in response to the Information Request Notice (the Notice) dated 12 December 2025 for the Dugald River Wind Farm Project (the Project).

The Notice relates to Development Application (SARA Reference: 2510-48813 SDA) pertaining to a Material Change of Use Application (Wind Farm Development and Battery Storage Facility Development) and Operational Works (Native Vegetation Clearing). The Project, located on the Knapdale Range, relates to land formally described as Lot 92 on SP35333993, Lot 93 on SP3533339, and Lot 36 on AP23793 (the subject site).

In response to the Notice and following detailed conversations with SARA, the Project has undergone notable change and updates which include, amongst other things, the development of a refined Project Layout which considers the ultimate configuration of the Project and constructability requirements.

The Project, which will be staged in delivery for the construction, operation and decommissioning of up-to 24 Wind Turbine Generators and a Battery Energy Storage System (BESS) with an ultimate capacity of 120 MW / 240 MWh. Stage 1 of the Project is shovel-ready and scheduled to commence in Q1, 2026 whilst Stage 2 is currently undergoing a detailed Feasibility Assessment in conjunction with the Queensland Government to confirm network capacity within the North West Power System and projected customer demand.

Please find attached to this Letter a revised Application Package for the Project comprising an updated Planning Report and associated Technical Assessments and Preliminary Management Plans. The revised Application Package comprises:

- Summary Response to SARA's Information Request Notice – **Attachment B**;
- Amended Planning Report - **Attachment C**, which includes the following new and updated technical reports in response to SARAs Information Request:
  - Project Layout Plan – *Appendix D*;
  - Preliminary Cleared Vegetation Management Plan – *Appendix E*;
  - Preliminary Construction Environment Management Plan – *Appendix F*;

- Preliminary Rehabilitation Plan – *Appendix G*;
- Decommissioning Security Report – *Appendix H*;
- Assessment of State Code 16 – *Appendix J*;
- Assessment of State Code 23 – *Appendix K*;
- Assessment of State Code 27 – *Appendix L*;
- State Policy Mapping – *Appendix M*;
- Matters of State Environmental Significance Impact Assessment Report – *Appendix N*;
- Preliminary Vegetation Fauna Management Plan – *Appendix O*;
- Stormwater Impact Assessment – *Appendix P*;
- Natural Hazard Risk Assessment – *Appendix Q*;
- Risk Management Assessment Report – *Appendix R*;
- Fire Safety Study – *Appendix S*;
- Emergency Response Guide – *Appendix T*;
- Bushfire Management Plan – *Appendix U*;
- Traffic and Pavement Impact Assessment – *Appendix V*;
- Oversize Overmass Construction Concept Strategy – *Appendix W*;
- Social Impact Assessment – *Appendix X*;
- Landscape and Visual Impact Assessment – *Appendix Y*;
- Bird and Bat Management Plan – *Appendix Z*;
- Noise Impact Assessment – *Appendix AA*;

We trust the above information satisfies SARA's Information Request such that the assessment of the development can continue.

If you have any queries regarding this application or require any further information during the course of the assessment, please do not hesitate to contact Josh Maunder, Project Manager via email at [josh.maunder@erm.com](mailto:josh.maunder@erm.com).

Yours sincerely



**Charissa Tomlin**  
Partner and Project Director



**Josh Maunder**  
Principal Consultant and Project Manager



## ATTACHMENT A SUMMARY RESPONSES TO SARA INFORMATION REQUEST NOTICE

SARA has identified a range of matters relating to State Code 16 and State Code 23

### Information Request Item #1

SARA requests amended plans be provided:

- Removing reference on the submitted plans/ documents to the "micrositing corridor"
- Clearly identifying the disturbance footprint
- Clearly showing what is proposed to be delivered in each stage
- Clearly identifying the proposed Battery Energy Storage System's (BESS) location and size
- Clearly showing all elements of the proposal on the plan in as much detail as possible, including existing uses such as the switching yard
- Showing the location of the Transmission Line Corridor on the project layout plan
- Including a clear legend on the plans detailing all the separate use components (i.e. Transmission lines, access tracks and ancillary infrastructure, offices and associated buildings, switching yard and BESS)

### Response:

The term 'Micrositing Corridor' has been removed from the documentation. The documentation has been updated to reflect the following terminology:

- 'Study Area' which is defined as the boundary in which the Technical Studies were completed for the Project. The Study Area reflects a refinement point during the Project's design and provides the worst case scenario for impacts.
- 'Disturbance Footprint', which is defined as the ultimate disturbance required for the construction of the Project.

The Project's Disturbance Footprint reflects the ultimate disturbance required for construction and includes areas for earthworks, stormwater management and stability controls. The Disturbance Footprint does not consider existing disturbance within the Project Layout and is therefore, conservative. The total disturbance area reflects the combination of permanent and temporary disturbance requirements for the Project.

Key considerations relevant to the finalised Disturbance Footprint include:

- Topographical and geotechnical considerations;
- Constructability requirements and costings;

- Ecological constraints including known and suspected, Purple-necked rock-wallaby dens;
- Avoidance of multiple disturbance corridors resulting in ecological fragmentation;
- The Life of Mine Plan and layout for the DRM including the Tailings Storage Facility;
- Electrical reticulation and connection to both the DRM and the NWPS; and
- Retention of flexibility in design for Stage 2 of the Project.

The Project Layout is shown on Figure 4-1 of the Planning Report and includes the defined Study Area which forms the basis of Technical Studies completed for the Project. At a granular level, Technical Studies have been completed using the Study Area to reflect a worst-case scenario for impacts associated with the Project which is a highly conservative approach. Where additional clarity is required, Technical Studies have been completed using the Disturbance Footprint.

Table 4-1 of the Planning Report provides an overview of the Project's Disturbance Footprint and Staging and has been updated to reflect what is proposed to be delivered during each stage of the Project. Additionally, Table 4-3 of the Planning Report has been included to provide clarity on the proposed BESS.

The Project Layout plan has been amended to clearly show all elements of the Project in as much detail as possible. The BESS location, switching yard, transmission line corridor have all been clearly depicted within this plan.

Moreover, the Planning Report and supporting documentation has been updated to reference the proposed staging of the Project. The Project will ultimately comprise the construction and operation of a Wind Farm comprising up to 24 x 6 MW Wind Turbine Generators (WTGs) and a BESS with an ultimate capacity of 120 MW / 240 MWh. Construction of the Project will be staged, with Stage 1 comprising eight WTGs and Stage Two comprising an additional (maximum) 16 WTGs. Stage 1 of the BESS will comprise 18 X Battery Units and 9 X Medium Voltage Power Stations (MVPS). Stage Two of the BESS will comprise an additional 48 X Battery Units and 24 X MVPS with a total connected capacity of 120 MW/ 240 MWh. The BESS will be located adjacent to the proposed 220/ 33kV switchyard and within the Central Operations and Switchyard Area.

## **Information Request Item #2**

SARA requires the following:

- Confirmation of the number and location of meteorological masts and associated access roads that are located outside of the "micrositing corridor"/ approved relevant purpose determination area (RPDA).
- The total disturbance areas associated with all design elements – e.g. powerlines, collection substations, hardstand areas, laydown areas, offices, BESS.
- Confirmation the potential impacts associated with transporting wind turbine infrastructure (WTI)(i.e. swept paths) to the site has been considered. The assessment should consider any clearing requirements to vegetation and any upgrades required to existing roads and waterway crossings.
- Confirmation of additional exit/entry tracks to the north and south outside of the "micrositing corridor" /approved RPDA will be required as per the Figure 5-3 Proposed

Bushfire Mitigation Measures plan included in the Appendix M - Natural Hazard Risk Assessment and any unconfirmed tracks that may need to be upgraded, cleared and maintained.

- Spatial files for any additional infrastructure that is to be associated with the development both within and outside of the "micrositing corridor"/ approved RPDA. Staging must be considered within this data.
- The location of the transmission corridor to be shown on plans, as it is identified in the legend on F3-2 Project Area Context plan but is not shown on the plan.
- Updated technical assessments and reports to include the impacts of the proposed BESS.
- Updated assessments to incorporate the proposed staging

**Response:**

The Project comprises two Permanent Meteorological Masts (Met Masts). The first Met Mast (Met Mast 1) will be located to the south of proposed WTG 06 and east of proposed WTG 07, whilst the second Met Mast (Met Mast 2) will be located to the south of the Central Operations and Switchyard Area.

For clarity, MMG has secured approval from Cloncurry Shire Council for two Temporary Met Masts, which will be decommissioned and the area rehabilitated once the Permanent Met Masts are constructed. The Temporary Met Masts are ultimately located where WTGs will be located and do not form part of the Development Application being assessed by SARA.

The total disturbance area reflects the combination of permanent and temporary disturbance requirements for the Project. The total Disturbance Footprint is 136.73 ha. Stage 1 has a total disturbance area of 74.04 ha whilst Stage 2 has an area of 62.69 ha.

A Traffic and Pavement Impact Assessment and Oversize Overmass (OSOM) Construction Concept Strategy have been undertaken for the Project. These assessments have provided a preliminary assessment for the movement of Project components and include WTG and BESS OSOM components. The assessments concluded that the proposed OSOM route for the Project is sufficient to support the transport of infrastructure to the site, with recommendations provided for the upgrade of roads and intersections along the route.

The Planning Report, and its supporting documentation, has been updated to include consideration of the proposed BESS. Existing technical assessments have been updated to reflect the revised Project Layout and where material changes to assessment outcomes would result from the inclusion of the BESS. New technical assessments including a Fire Safety Study, Bushfire Management Plan, Emergency Response Guide, and Risk Management Assessment Report have been included within the Report to address the assessment requirements associated with State Code 27. Additionally, as the Project is now proposed to be constructed utilising a staged approach, all documentation has been updated to reference delivery across two stages.

**Information Request Item #3**

SARA requests the following information be provided:

- Revised SRI assessment using the SRI Guideline for matters of state environmental significance and prescribed activities assessable under the Sustainable Planning Act 2009 (The Department of State Development, Infrastructure and Planning, 2014)
- SRI Assessments for all relevant MSES (prescribed environmental matters) including:
  - Regional ecosystems (res) within the defined distance of a watercourse
  - Res that intersect with a wetland
  - Connectivity
  - Essential Habitat (EH)
- Revised SRI assessment for the Disturbance Footprint that is proposed. The Disturbance Footprint must be assessed for the SRI, with an understanding that the approved relevant purpose area may be utilised when the design is further engineered.
- An updated impact assessment including all impacts to regulated vegetation intersecting a watercourse, the defined widths should be used to quantify impacts, rather than an assumed 2 m width
- All revised reporting is to include the proposed BESS and staging

**Response:**

All documentation pertaining to the Project, has been updated to include the BESS and to reflect Project delivery across two stages where staging has a material impact on the actual or potential impacts associated with the Project.

A revised SRI assessment has been completed in accordance with the Significant Residual Impact Guidelines for matters of state environmental significance and prescribed activities under the *Sustainable Planning Act 2009*. This has been updated in the documentation, including the Matters of State Environmental Significance Impact Assessment Report and the Bird and Bat Management Plan.

The SRI assessments conducted for the Matters of State Environment Significance (MSES) Impact Assessment Report reviewed Regulated Vegetation, of which the entire Disturbance Footprint is mapped as Category B Regulated Vegetation. Furthermore, the following MSES matters were identified:

- Remnant Vegetation within the defined distance of a watercourse, of which 0.75 ha is mapped within the Disturbance Footprint;
- Regulated vegetation – endangered or of concern regional ecosystem - No endangered or of concern REs as defined under the *Vegetation Management Act 1999* are mapped as present within Disturbance Footprint;
- Regulated vegetation – Regional Ecosystem intersecting a wetland - No vegetation management wetlands are mapped within the Disturbance Footprint and therefore no wetlands are intersected by a wetland;
- Essential habitat – it was identified that with the exception of areas related to the DRM Tailings Storage Facility and the DRM Accommodation Camp in the northern section of the Knapdale Range, the entirety of the Knapdale Range and other locally

connected areas are mapped as essential habitat on the *Vegetation management essential habitat map no attribute - version 12.09*. At a high-level there is 135.70 ha of mapped essential habitat for the Purple-necked rock-wallaby mapped within the Disturbance Footprint. The Project's Disturbance Footprint utilises 17 years of ground-truthed ecological surveying to refine habitat mapping for the Purple-necked rock-wallaby. The Project Layout avoids Purple-necked rock-wallaby Dens entirely and limits impacts to foraging and dispersal habitat by locating disturbance areas on ridgelines which are non-preferred areas for the Purple-necked rock-wallaby.

- Connectivity - The Knapdale Range consists largely of undisturbed habitat, occupying an area of approximately 6,000 ha of which only 136.73 ha (~2.3%) is proposed to be disturbed by the Project. Species dispersal along the Knapdale Range is unlikely to be hindered due to the availability of habitat surrounding the proposed disturbance. Moreover, the Project footprint will be linear and narrow, which is unlikely to inhibit crossing by most wildlife. As the Knapdale Range is located within a region of relatively undisturbed habitat, those species dispersing away other potential populations remain largely unhindered, with the potential exception of existing infrastructure relating to the DRM. Connectivity via riparian vegetation communities will remain largely unhindered as these areas will be avoided as far as practicable by the Project.

The SRI assessment for remnant vegetation within a defined watercourse have been updated within the MSES Impact Assessment Report and has been determined to be unlikely to result in an SRI as the work will:

- Result in permanent clearing less than 25 m in width;
- Include revegetation of exposed embankments as per the Project's rehabilitation plan;
- Include temporary erosion and sediment control outlined in Section 6.2 and the Project's Erosion and Sediment Control Plan;
- Include a crossing design, through the use of culverts as outlined in section 6.2, to avoid interference with the existing aquatic and terrestrial habitat of the watercourse; and
- Result in less than 1 ha (0.74 ha) of clearing of 'least concern' Regional Ecosystems on stream order 1 and 2 watercourses and include sediment and rehabilitation measures.

**Information Request Item #4**

SARA requests the following information be provided:

- Further information (such as justification supported by peer reviewed journals) to support the suitability of the method used to identify PNRW potential denning areas.
- Confirmation if LiDAR was used or the source of the 'high resolution satellite imagery'.
- Details of any field validation that was completed to confirm the accuracy of the habitat spatial analysis. Given that suitable denning habitat is associated with entire drainage lines, it may be more appropriate to map the entire drainage lines as potential denning habitat, rather than individual locations (based on satellite imagery).
- Details of methods to be used on how 'care will be taken to avoid essential habitat where possible', given the extensive amount of mapped essential habitat within the approved relevant purpose area.
- Details on the vehicle speed limits and how this will adequately mitigate the risk of vehicle collisions with fauna, particularly PNRW.
- Details of the proposed barriers to be used to protect the PNRW, and where these will be located.
- A complete impact assessment of construction and operational impacts including impacts associated with increased vehicle movement, additional nighttime lighting, dust impacts on adjacent vegetation communities and the potential for a reduction in habitat quality, particularly as it relates to the reduction of foraging habitat for PNRW.
- Amended MSES Ecological Impact Assessment Report to use consistent language regarding the location of den sites in proximity to the "micrositing corridor" including correcting the interchanging of 'within' and 'near', 'known' and 'confirmed', and 'probable' and 'speculated'.
- Further evidence of how 'high value and breeding habitat' for PNRW will be identified and avoided.
- Provide an assessment of the likelihood that breeding habitat for the species is able to be avoided

**Response:**

The term 'Micrositing Corridor' has been removed from the documentation.

The Project Layout has been refined and presents a consolidated and finalised Disturbance Footprint. As a result of this refinement of the Project, the MSES Impact Assessment Report has been entirely revised and as such a number of matters raised in this item are no longer directly applicable to the Project.

Section 2.3 of the MSES Impact Assessment Report has been updated to include appropriate peer-reviewed scientific references to support the suitability of the method utilised to identify known and potential, Purple-necked rock-wallaby habitat types and functionality. Potential denning habitat for this species was modelled using a combination of slope, derived from a digital elevation model, underlying geology of the site, and apparent roughness of terrain derived from the digital elevation model. This information was then compared against known occurrences of the species within the Study Area, along with 18 confirmed active denning

locations to ensure accuracy of the model. An average linear dispersal distance limit of 250 m was added as a buffer around the known and modelled potential denning habitat representing a 16 ha home range (foraging area) from any single point within the potential denning habitat, based on known home ranges from closely related and morphologically similar rock-wallaby species (Horsup, 1994). Purple-necked rock-wallabies rarely venture into flat plains due to a lack of shelter (Mittermeier & Wilson, 2015) and it is therefore assumed that any areas adjacent to habitat and of medium to high slope is possible dispersal habitat for the species.

A Preliminary Fauna and Vegetation Management Plan (refer to *Appendix O* of the Planning Report) has been created to support the proposed development. Section 6 of this report details proposed environmental management measures to avoid, minimise or manage the potential impacts of the Project on flora and fauna. The following mitigation measures have been proposed for the Purple-necked rock-wallaby:

- No known or potential dens as identified in Purple-necked rock-wallaby monitoring or habitat spatial analysis disturbed;
- No rocky habitat identified during pre-clearance surveys or by Fauna Spotter Catchers as suitable for the Purple-necked rock-wallaby disturbed; and
- Development and implementation of a Purple-necked rock-wallaby Management Plan (PNRWMP) which will include site-specific control measures (e.g. vehicle speeds, barriers, etc) relevant to the Project for both construction and operations.

Vehicle speed limits will be in place on site, with all persons driving on site to remain on designated access tracks to lower the risk of animal strike. These speed limits are to be signed and enforced on all site access tracks, with speed limits to be made known in site inductions, and any enforcements recorded. The introduction and maintenance of speed limits of site will enable drivers to be travelling at a low speed so that they are able to identify, and stop with enough time, to avoid hitting any fauna which may be on the access track. Speed limits on site will ensure site safety for fauna and persons travelling within the site. The enforcement of these speed limits will be of the greatest importance during the construction phase of the Project, where multiple vehicles are transversing the site. Speed limits are also to be maintained during the operational phase of the Project. Specific speed requirements as relevant to the time of day (noting that Purple-necked rock-wallaby activities are most prevalent at dawn and dusk) will be detailed in the PNRWMP.

A Preliminary Construction Environmental Plan has been prepared to accompany the Development Application. This report, along with the MSES Impact Assessment Report, Risk Management Assessment Report, Preliminary Cleared Vegetation Management Plan, Preliminary Rehabilitation Plan and Preliminary Vegetation Fauna Management Plan have provided an assessment of potential impacts, including impacts associated with increased vehicle movement, additional nighttime lighting, dust impacts on adjacent vegetation communities and the potential for a reduction in habitat quality, particularly as it relates to the reduction of foraging habitat for purple-necked rock-wallaby.

No known denning locations, and very little modelled potential denning habitat occurs within the Disturbance Footprint. This is because the Disturbance Footprint is located almost entirely within the flat habitat present on the top of the range, whereas the denning habitat is limited to the sloped areas that skirt the range or along drainage lines and gullies. The

total area of PNRW habitat impacted by the proposed Disturbance Footprint amounts to 2.37 ha of modelled potential denning habitat and 133.25 ha of modelled potential foraging/dispersal habitat. This amounts to approximately 0.7 % of the available 299.22 ha of modelled potential denning habitat and 1.8 % of the available 7124.15 ha of modelled potential foraging/dispersal habitat on and adjacent to the Knapdale Range. In either regard, the extent of any potential impact to potential denning habitat will not result in a fragmentation of habitat for denning purposes.

#### **Information Request Item #5**

Provide a tabularised survey effort table detailing the BBUS effort relative to seasonal requirements and clearly state if the survey effort meets the guideline requirements.

#### **Response:**

A tabulated survey effort has been added within the Bird and Bat Management Plan which details the survey period, site and surveyor (Table 23 of the Bird and Bat Management Plan).

#### **Information Request Item #6**

SARA requests a detailed explanation of the rationale for how rehabilitation activities will be implemented progressively following the completion of construction works. This should specifically address areas within the Disturbance Footprint once construction in those locations has concluded as such the following detailed information is required to be provided:

- A plan and spatial data identifying the location and extent of all temporary use areas. The purpose of each temporary use area will also need to be identified and which stage the temporary use areas are associated with.
- Details of temporary use areas which are appropriate for rehabilitation, including further justification if the clearing extent, earthworks and compaction result in rehabilitation not being possible within a reasonable time frame (i.e. 20 years).
- Where the temporary use areas can be rehabilitated back to remnant status, an Environmental Clearing Management Plan must be provided in accordance with Appendix 11 of the Guide to State Development Assessment Provisions - State code 16: Native vegetation clearing. This appendix can be accessed at [https://www.qld.gov.au/\\_\\_data/assets/pdf\\_file/0024/374523/sdap-guide-state-code-16.pdf](https://www.qld.gov.au/__data/assets/pdf_file/0024/374523/sdap-guide-state-code-16.pdf)
- Details of what is considered to be 'progressive' rehabilitation and identify whether grazing will be introduced prior to rehabilitation being completed. It should be noted that temporary use areas are not progressive clearing areas as identified in State Code 23.

**Response:**

A Decommissioning Security Report which includes a Preliminary Battery Recycling Strategy has been prepared for the Project. Following completion of the construction phase, areas not required for ongoing operational activities will be rehabilitated and/or regenerated in accordance with good practice management measures as detailed in the provided Preliminary Rehabilitation Management Plan. These actions will include:

- Temporary use areas, including construction laydown areas, concrete batching plants, temporary site office, and construction site compound.
- All materials removed from the Project footprint will be sorted and packaged for reuse and/or recycled where possible in accordance with the waste hierarchy.

An End of Construction Decommissioning Plan will be prepared prior to finalisation of construction. At the end of the Project's economic life, the WTG towers and other above ground infrastructure will be removed, and the area will be rehabilitated in accordance with the regulatory framework applicable at the time and in consultation with the landowner per the existing sub-lease agreement. This will include:

- All above ground infrastructure not required for the ongoing agricultural use of the land, including the WTGs, substations, and operation and maintenance facilities, will be removed and the land rehabilitated;
- Any access tracks and hardstands not wanted or required by the landholder will be removed and land rehabilitated and returned to a primary production use;
- Below ground infrastructure, including cabling and the WTG foundations, will be left in situ to avoid further disturbance and minimise clearing of revegetated areas. Rehabilitated areas will be adequately graded to reflect the slope of the surrounding area and to mitigate the risk of soil erosion; and
- All materials removed from the Project will be sorted and packaged for reuse and/or recycled where possible in accordance with the State Government's waste hierarchy.
- As part of decommissioning the Project, particularly the BESS facility, the reuse, recycling and recovery of battery components will be undertaken in accordance with the Preliminary Battery Recycling Strategy.

The Preliminary Rehabilitation Management Plan has been prepared which identifies areas of disturbance associated with the Project which may be progressively rehabilitated. Rehabilitation objectives have been developed with consideration for the existing condition of the Knapdale Range, potential ongoing direct and indirect impacts, the need to maintain setbacks to reduce bushfire risk, and the need for disturbance to undertake decommissioning and maintenance activities.

**Information Request Item #7**

SARA requests a site plan be provided that identifies the extent of clearing of vegetation proposed within any mapped or unmapped waterway and what stage any clearing is proposed in. This should include delineation of the Disturbance Footprint.

**Response:**

Figure 5 of the MSES Impact Assessment Report displays the Regulated Vegetation watercourses and Essential Habitat with delineation of the Disturbance Footprint and the proposed staged approach for construction and operation.

**Information Request Item #8**

To demonstrate that the development has been designed to avoid areas of very high and extreme erosion, and to ensure it will be progressively stabilised during construction to not impact the surrounding waterways and landscape, SARA requests the following information:

- An assessment of the extent to which the Disturbance Footprint avoids very high and extreme erosion risk areas.
- Details of whether areas of very high and extreme erosion risk can be avoided and, if not able to be avoided, what management measures will be undertaken in those areas during construction, operation, and decommission phases of the Project.
- Details of how areas cleared for construction will be progressively stabilised during construction to ensure that erosion and run off to the surrounding landscape and waterways is minimised. This may be achieved by reference to relevant supporting documentation or additional assessment.
- Clearly delineate areas for proposed stage 1 and stage 2

**Response:**

The Stormwater and Erosion Risk Assessment Report has been updated to reflect the mitigation of impacts related to very high and extreme erosion.

The Report provides a Revised Universal Soil Loss Equation (RUSLE) classification of erosion risk throughout the Disturbance Footprint. Approximately 72% of the Disturbance Footprint is classified as Very Low to Low erosion risk with only a small area being mapped as High to Very High erosion risk.

The Project will implement the following measures to mitigate and manage impacts on water quality and erosion within the Study Area:

- Implementation of a Preliminary Construction Environmental Management Plan;
- A site-specific Erosion and Sediment Control Plan will be developed in line with best practice management measures and will be developed in conjunction with the construction contractor;

- A surface water monitoring program is to be implemented prior to and during construction, and if appropriate during the operational phase of the Project; and
- Progressive rehabilitation of disturbed areas will be undertaken, in line with best practice management measures.

### Information Request Item #9

SARA requests the following additional information is provided so that an assessment can be undertaken in regard to clearing within watercourses:

- The total area (ha) of clearing within the defined distance of a watercourse.
- Details of aquatic flora and fauna surveys undertaken, including methods and results.
- An assessment of how the clearing will maintain the composition, structure and function of the regional ecosystem associated with a watercourse. If a performance outcome is proposed, the outcomes should be consistent with the criteria described in the Guide to State Development Assessment Provisions State code 16: Native vegetation clearing, including the guidance provided in Appendix 2 'Composition, structure and function of regional ecosystems'.

### Response:

The total area (ha) of clearing within the defined distance of a watercourse is less than 1 ha, being approximately 0.74 ha on stream order 1 and 2 watercourses.

Section 2.2 of the MSES Impact Assessment provides details of aquatic flora and fauna surveys undertaken:

- Surveys were conducted for both terrestrial and aquatic flora species during the wet season to ensure the highest level of detectability, especially in regard to ephemeral aquatic flora species.
- Habitat assessments were conducted across the site, including along watercourses and drainage lines for assessments of aquatic habitat.

State Code 16 (refer to *Appendix J* of the Planning report) has been updated to include an assessment on how the proposed clearing will maintain the composition, structure and function of the regional ecosystem associated with a watercourse.

**Information Request Item #10**

SARA requests that the following additional information is provided to demonstrate that the risk of serious harm to persons or property from bushfire can be appropriately mitigated during the construction and operation of the development, taking into consideration the location the mining camp:

- Further details in regard to how the 2 additional recommended access tracks to the north and south for bushfire safety are proposed to be delivered, noting these locations are not within the RPDA. SARA notes the NHA recommended that a Class 2 fire line standard track requires a total of 10m cleared width.
- Further details on if the proposed track locations would be able to be accessed by 4wd noting the terrain. SARA also requests further information on the “unconfirmed tracks” and if these would be able to be trafficable and where these lead too. Information is also required if clearing is necessary for these tracks to be upgraded to a class 2 fire line standard track.
- A Bushfire Management Plan (BMP) addressing construction and operational phases of the project. This plan must consider the location of the existing permanent mining camp that will be used for accommodation both during construction and then ongoing for the life of the development. The BMP must:
  - Be prepared by a suitably qualified person
  - Provide a site specific assessment of the bushfire hazard risk analysis
  - Provide Mitigation Strategies including measures such as siting of infrastructure and Asset Protection Zones, Firefighting Water Supply (45,000l at each entry point including proposed north and south tracks)
  - Provide ongoing maintenance strategies
  - Be prepared in consultation with the Rural Fire Service Queensland and all host land owners
  - Include evacuation procedures for construction and operational workforces in the event of a bushfire emergency
  - Include emergency response procedures for any on-site battery or electricity substations (including battery energy storage systems) in the event of it catching alight as well as threats posed to it by a nearby bushfire.
  - Take into consideration the proposed BESS
  - Incorporate the proposed staging of the development into bushfire risk mitigation strategies.
- A copy of the existing Bushfire Response Report for the Dugald River Mine, as this is referred to for the bushfire mitigation response.
- Provide a Preliminary Safety and Emergency Management Plan (SEMP) addressing construction and operation activities. The preliminary SEMP must:
  - Be prepared by a suitably qualified person.
  - Include a Hazard Analysis and Risk Assessment (HARA) undertaken in accordance with AS/NZ ISO 31000:2009 Risk Management Principles and Guidelines and with HB203:2006 Environmental Risk Management Principles and Processes.

- Identify scenarios for both construction and operational phases that would trigger emergency evacuation (by workers, visitors and also host land owners) of the development.
- Include emergency evacuation plans for the scenarios identified above
- Contain safety management plans, fire risk management plans and emergency response procedures
- Ensure that plans required for this condition are developed in consultation with relevant state and regional emergency service providers

**Response:**

To support and facilitate the development of the Project, a revised Natural Hazard Risk Assessment Report and Bushfire Management Plan have been prepared. Furthermore, a Risk Management Assessment Report, Fire Safety Study, Emergency Response Guide for the BESS have also been provided.

As the site is located within bushfire prone land, the site will maintain appropriate housekeeping activities, included vegetation management, to prevent the accumulation of combustible loads. These measures, combined with the sparse vegetation present throughout the Project Area, is anticipated to result in minor grass fire events where a fire event occurs. Grass fires, whilst quick-moving in nature, are short-lived as the combustible load becomes exhausted. Subsequently, sustained radiant heat impacts at the BESS site are not anticipated and are unlikely to result in a sufficient heat impact to the BESS or surrounding infrastructure such that incident propagation occurs.

Furthermore, the assessments determined that in the event a fire originates on site, such an event is considered unlikely to escalate to a level that threatens developments surrounding the BESS facility. The assessments therefore concluded that the proposed design and existing fire protection measures within the Project Area will adequately manage credible fire risks at the site.

Notwithstanding, the Bushfire Management Plan outlines preliminary mitigation measures for implementation during the construction and operational phases of the Project. Final measures to be implemented will be confirmed prior to construction commencing.

**Information Request Item #11**

Provide a Heavy Vehicle and OSOM Construction Concept in accordance with the Planning guidelines for State code 23. The plan at a minimum should include:

- The consultation that has occurred with relevant stakeholders (including Port Authorities, local government traffic managers, DTMR regional offices and the National Heavy Vehicle Regulator) in the formulation of the strategy
- Details of the proposed turbines and ancillary infrastructure key components that were used to inform the strategy formulation (for example, expected volumes and maximum dimensions and weights of components requiring OSOM haulage)
- Proposed vehicle types and availability to be used for OSOM haulage
- Key identified 'pressure points' on proposed OSOM routes such as bridges, structures, railway level crossings and any sections of constrained horizontal and vertical geometry
- Details of how the proposed construction haulage can be feasibly achieved, at full cost to the proponent, including identifying appropriate 'pressure point' route mitigation measures and concept road upgrades
- The feasibility of the Tommy Creek Crossing if that route is to be used
- Any proposed intersection and or road upgrades.

**Response:**

A Traffic and Pavement Impact Assessment (TPIA) and Oversize Overmass Construction Concept Strategy has been prepared for the Project and provides a preliminary assessment for the movement of Project components. In addition to these Reports, MMG has, independently of this Application, engaged directly with the Department of Transport and Main Roads, Ergon Energy and Energy Queensland and State and Local Governments to agree on a suitable transport route for the Project.

The main transport route is Townsville Port to Dugald River Mine via Flinders Highway. The proposed transport route includes the following bypasses:

- Townsville to Charters Towers – The generators and some tower sections to travel from Townsville to Charters Towers via Hervey Range Road and Gregory Development Road to bypass the Macrossan Burdekin River bridge and Reid River bridge.
- Charters Towers Railway overpass – Loads higher than 5.5 m to bypass the railway overpass on Flinders Highway in Charters Towers via New Queen Road and Victory Street.
- Tommy Creek bridge – The generators, hubs and some towers sections to bypass the Tommy Creek bridge via a new crossing to be constructed.

The civil, electrical and wind turbine materials and facilitating plant and equipment are to be transported from Townsville, Mount Isa, local Cloncurry quarry, Brisbane, Rockhampton, Melbourne, Adelaide and possibly Newcastle. The existing DRM Accommodation Camp infrastructure and transit shuttle arrangements between the Cloncurry Airport and accommodation are planned to be utilised to reduce pavement impacts for the Project's workforce.

The proposed haulage route for the requires modifications to allow transport of the OSOM components including:

- Road and intersection widening;
- Minor vegetation clearing;
- Vertical regrading;
- Concrete median and kerb modifications;
- Modifications to signage;
- Lifting and modifications to powerlines; and
- Construction of bypass around Tommy Creek bridge on Burke Developmental Road.

The TPIA identified that there are no intersection works identified for traffic capacity requirements and there are no seal, pavement or formation width deficiencies for the traffic volumes or capacity requirements.

### **Information Request Item #12**

SARA requests an updated Acoustic Amenity Report is provided that assesses any potential acoustic impacts of the proposed BESS to sensitive receptors, in particular the on-site permanent Workers Camp.

### **Response:**

The Noise Impact Assessment Report been updated to include potential impacts associated with the BESS on three identified receptors being the McMillan Residence, the DRM Accommodation Camp and the DRM Fly Camp.

Of the three receptors, only the McMillan Residence is classified as a true sensitive receptor given the DRM Accommodation Camp and DRM Fly Camp are subservient land uses to the DRM as approved under a single Environmental Authority under the *Environmental Protection Act 1994* for a Resource Project relating to a resource tenure. For conservatism and operational purposes, impacts to all three receptors have been modelled Modelled with results included in the Noise Impact Assessment Report.

The applicable BESS operational assessment scenarios were developed based on the Project information and site specific meteorological conditions. The outcome of the assessment indicates that compliance with the adopted noise criteria for the Project is achieved at all three receptors with compliance at the McMillan Residence achieved by a notable margin.

As a result of the Noise Modelling outcomes, no specific noise mitigation measures have been proposed or are required as the Project will be compliance with the requirements of State Code 27 and the AQO from the EPP Noise 2019.

Opportunistic mitigation measures and strategies through BESS technology selection, localised equipment noise control among other options with equivalent or improved noise impact mitigation performance have been included for completeness, however, are not required to achieve compliance with the applicable noise limits.

**Information Request Item #13**

SARA requests the following information:

- Sound power level ata
  - Provide the sound power level specification for the Goldwind GW165-6.0MW turbine used in the AAR.
- Justification for receptor representation
  - Explain the rationale for representing the Workers Camp as a single receptor.
- Receptor coordinates
  - Supply the exact coordinates for the receptor representing the Workers Camp for input into SARA’s modelling.
- Mitigation measures
  - If any mitigation measures are proposed to reduce noise impacts on workers at the camp, provide details (e.g., soundproofing of buildings or other measures)

**Response:**

The Sound Power Levels (SWLs) for the Goldwind GW165-6.0MW WTG, for wind speeds from 3 m/s to 12 m/s have been provided by the manufacturer and are presented in the Noise Impact Assessment Report. This dataset was used for the Noise Modelling.

It is noted that two published versions of the SWL data for the candidate WTG exist. For completeness, the revised Noise Modelling uses the more conservative SWL levels being 112.2 dB(A) which includes a +1.7 dB uncertainty factor.

Mitigation measures for the Project are not required as compliance with the adopted noise criteria is achieved. Opportunistic mitigation measures and strategies have been included for completeness and comprise background noise monitoring prior to Stage 2 construction and development of a Noise Monitoring Plan for operations.

Coordinates for each receptor are as follows:

<b>Receptor ID</b>	<b>Receptor Coordinates (GDA2020 Zone 54)</b>	
DRM Accommodation Village	410092	7762944
DRM Fly Camp	412079	7760305
McMillan Residence	413612	7754300

## ADVICE ITEMS FROM SARA

### Advice Item #1

To assist SARA in reviewing the submitted material, the following is requested:

- Confirmation whether a 10 km, 25 km, or 50 km search radius was applied in the desktop assessment for the MSES survey.
- An assessment of its adequacy against current survey methodologies and its suitability for identifying species currently listed under the NC Act. Clearly identify which historical survey data has been relied upon and outline any associated limitations
- An assessment of survey adequacy relative to the current disturbance footprint/ RPDA and in accordance with the State Code 23 Planning Guideline.
- Confirmation of survey currency, including the exact dates for all surveys undertaken rather than date ranges.
- Table 4 of the MSES Report lists 344 quaternary sites; however, these are not shown on Figure 3. Either update Figure 3 to display all survey sites or revise the survey effort to reflect only the sites relevant to the Project.
- For all fauna surveys, include both the number of sites and the number of trap nights.
- Update Figure 3 of the MSES Report to illustrate the complete survey effort.
- To enable assessment of seasonal surveys, state the number of surveys conducted per season in line with seasonal requirements.
- Review Section 2.2.1 of the MSES Report and ensure consistency between Table 4 and Figure 3. All survey methods described in Table 4 and Section 2.2.1 should be shown on Figure 3 or a series of figures.
- Confirmation whether targeted species survey meanders were conducted for threatened flora species and show their locations on a figure.
- Confirmation of the method used for validating regional ecosystems, specifically whether secondary sites were utilised.
- Confirmation whether habitat assessments were undertaken in 2023

### Response:

As per the MSES Impact Assessment Report, a comprehensive desktop analysis was undertaken to identify potential environmental values, constraints, and potential impacts of the Disturbance Footprint and to enhance understanding of the ecological values present. Despite the area being extensively studied, the Precautionary Principle was applied, and species and protected matters searches were undertaken using a 50 km search buffer from a central point (Latitude: -20.24531, Longitude: 140.13467) located within the Disturbance Footprint. Endangered Vulnerable and Near Threatened flora (EVNT) Species were assessed using the default search tool radius (10 km) due to their localised nature.

The reporting has been updated and refers to the updated Disturbance Footprint, including the proposed staging of construction and operations and BESS facility.

Table 5 of the Report details the survey effort and method used, with Table 6 providing survey timing and season in line with seasonal requirements for surveys. These tables also confirm habitat assessments were undertaken in 2023.

#### Section 2.2.1

2 of the report confirms that where habitat suitable for EVNT Endangered Vulnerable and Near Threatened flora species was identified, target species survey meanders were conduct.

### **Advice Item #2**

- To ensure SARA can understand what extent the ground-truthed vegetation community data within the site differs from the Queensland Government mapping, provide the following:
- An updated Figure 4 showing the status of mapped regional ecosystems using VM Act status, rather than Biodiversity Status to allow confirmation of 'endangered' or 'of concern' RE within the Micrositing corridor.
- An assessment of the extent to which the ground-truthed regional ecosystems differs from the Qld Gov mapping.
- The area (ha) of proposed clearing of each GTRE within the Disturbance Footprint.

### **Response:**

Figure 4 of the MSES Impact Assessment Report has been updated to show the status of mapped Regional Ecosystems per the classifications under the *Vegetation Management Act 1999*.

Field survey results are provided within Section 3.2 of the Report. This section concludes ground-truthed vegetation within the Disturbance Footprint is consistent with previous ground-truthing surveys conducted

Ground-truthed Regional Ecosystem (GTRE) Mapping is presented in Figure 6 of the MSES Impact Assessment Report and can be compared with Regional Ecosystem Mapping. Table 11 presents the area of proposed clearing of each GTRE within the Disturbance Footprint as follows:

- RE 1.3.7b
  - Stage 1 Disturbance – 0.27 ha
  - Stage 2 Disturbance – 0 ha
- RE 1.11.2a
  - Stage 1 Disturbance – 67.60 ha
  - Stage 2 Disturbance – 61.17 ha
- RE 1.11.3a
  - Stage 1 Disturbance – 5.02 ha
  - Stage 2 Disturbance – 0.48 ha
- RE 1.5.4
  - Stage 1 Disturbance – 0.83 ha

- Stage 2 Disturbance – 0 ha
- RE 1.7.7b
  - Stage 1 Disturbance – 0 ha
  - Stage 2 Disturbance – 0.52 ha

### **Advice Item #3**

- Provide the results of any aquatic surveys or habitat assessments undertaken, including an assessment of habitat values provided by the constructed farm dam.
- Provide a figure showing all waterways providing fish passage and consider if any are present in the “Micrositing corridor”/ approved RDPA area.
- This assessment in Table 9 does not appear to consider impacts associated with erosion and sediment, particularly as they relate to downstream impacts - and particularly as they relate to Merten's water monitor. As several drainage lines discharge directly into mapped suitable habitat for the species, provide an assessment of indirect impacts.
- The impact assessment appears to be based on the assertion that there is an “absence” of local perennial water sources in close proximity to the “micrositing corridor”/ approved RDPA. Confirm whether the constructed farm dam would be considered a ‘perennial water source’ and thus provide aquatic and/or wetland habitat values and Merten's water monitor.

### **Response:**

As detailed in the MSES Impact Assessment Report, previous ecological surveys undertook both terrestrial and aquatic flora species during the wet season and included assessments along watercourses and drainage lines for assessments of aquatic habitat.

It is unclear what feature on the Knapdale Range constitutes the ‘Farm Dam’, however, it is considered likely that the large waterbody to the north, which is the DRM Tailings Storage Facility has been mistaken for a farm dam. For clarity, the DRM Tailings Storage Facility has water quality comprising a low pH and concentrations of contaminants including heavy metals and is not suitable aquatic habitat. Given the DRM Tailings Storage Facility is an approved Regulated Structure under the *Environmental Protection Act 1994*, it does not constitute a suitable water source for the Mertens Water Monitor.

The Stormwater and Erosion Risk Assessment Report highlights all waterways and drainage lines relevant to the Project and the Disturbance Footprint. Erosion and Sediment Control is specifically addressed in this Report.

**Advice Item #4**

- The use of stronger and more committal language is recommended. If the term 'where possible' is used, define the conditions where this would be possible, and where this would not be possible.
- Further details on when fencing will be provided around 'active works areas' and define the term 'active works areas' as this requirement would appear difficult to achieve.

**Response:**

The Application documents have generally been updated to refine language. Noting that a number of impact assessments relate to preliminary management actions, the use of non-specific language is considered suitable in this instance given detailed management plans will be developed once the detailed design and construction methodology is finalised.



ATTACHMENT B SARA INFORMATION REQUEST



ATTACHMENT C AMENDED PLANNING REPORT