



SARA reference: 2410-43211 SPL
Applicant reference: MMG Dugald River Wind Farm Project

16 December 2024

MMG Dugald River Pty Ltd
Level 9, 260 Queen Street
BRISBANE QLD 4000
mifanwy.press@erm.com

Attention: Ms Mifanwy Press

Dear Ms Press

SARA Pre-lodgement advice – MMG Dugald River Wind Farm – Dugald River Mine Access Road, Cloncurry

I refer to the pre-lodgement meeting held on 19 November 2024 in which you sought advice from the State Assessment and Referral Agency (SARA) regarding the proposed development at the above address. This notice provides advice on aspects of the proposal that are of relevance to SARA.

SARA's understanding of the project

MMG Dugald River Pty Ltd are proposing to develop the Dugald River Wind Farm Project (the Project) which will comprise up to 24 Wind Turbine Generators (WTGs) and associated ancillary infrastructure.

The project will be located on the Knapdale Range, adjacent to the Dugald River Mine and approximately 63 km north north-east of Cloncurry. The project consists of the following:

- up to 24 X 6 MW WTGs
- foundations and hardstand areas
- access tracks
- electrical infrastructure
- permanent Meteorological Masts (Met Masts)
- temporary construction and material laydown areas
- a central operational and maintenance facility.

The purpose of the proposed development is to generate a renewable energy source which can be utilised to service the Dugald River Mines energy requirements with any excess generation available to service other electricity loads in the network. The mine currently sources electricity from the gas fired Diamantina Power Station and Dugald River Solar Farm. Energy is currently one of the highest operating cost for Dugald River Mine and is subject to high pricing variability. A combination of renewable energy

sources will reduce operational costs and stabilize price volatility, and these combined outcomes will improve the financial sustainability of the operation whilst providing positive environmental outcomes in the form of reduced emissions.

Supporting information

The advice in this letter is based on the following documentation that was submitted with the pre-lodgement request or tabled at the pre-lodgement meeting.

Drawing/report title	Prepared by	Date
Project Footprint	ERM	-
Regulator briefing presentation - Slides	ERM	19 November 2024

Pre-lodgement meeting record

Meeting date	19 November 2024
Meeting location	445 Flinders Street Townsville City
Meeting chair	Kirsty Geaney
Meeting attendees	Refer to Attachment 1
Minutes of Meeting	<p>ERM on behalf of MMG presented the MMG Dugald River Wind Farm Project:</p> <ul style="list-style-type: none"> - ERM introduced the project and the existing Dugald River Mine - previous approvals relevant to the Preliminary Design were summarised, including 8 turbines previously approved under the mining lease but not constructed. - an overview of changes leading to the optimised design with the intention to generate and off-load power with an expanded 24 turbine design. - outline the preliminary project description, project footprint and micro siting corridor. - updates on technical studies and impact assessments- including <ul style="list-style-type: none"> o Impact Assessment for Matters of State Environmental Significance and Matters of National Environmental Significance o Aviation Impact Assessment o Electromagnetic Impact Assessment o Noise Impact Assessment o Erosion and Surface Water Impact Assessment o Landscape Visual Impact Assessment o Shadow Flicker Assessment o Transport Impact Assessment and Route Assessment - the proposed project timeframe and application submission was discussed. Lodgement with SARA is tabled for March 2025. <p>SARA raised queries for discussion throughout the presentation including:</p> <ul style="list-style-type: none"> - Concern with the micro siting detail which is relevant for conditions. Concern is that it is currently too large, irrespective of variability the corridor should be as accurate as possible. SARA's condition on the MCU will not refer to 'micrositing', as such it should be removed from the proposal plan(s) (further

	<p>advice provided post-meeting).</p> <ul style="list-style-type: none"> - Met masts (x 4) are proposed as accepted development requirements as necessary built infrastructure. ADR advice can be provided, however, ERM and MMG are encouraged to liaise with the Vegetation Management team with Department of Natural Resources, Manufacturing, Mines, Regional and Rural Development (DNRMMRRD). - Refer to the SDAP planning guideline for technical reports – those listed in the presentation seem appropriate - Workforce accommodation on the mine site is a sensitive land use for the purpose of SARA triggers and assessment. Previous confirmation was provided in email. - BESS and Workers accommodation is ancillary – other uses like concrete batching etc are not. - Transmission line is existing to the Dugald River Mine. - Engagement with local community – social license – consultation was done as part of the EA which was well received. Proponent also advised that Council is supportive. - Department of Transport and Main Roads (DTMR) – haul route – ERM have spoken to them and with Ergon for connection.
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Pre-lodgement advice

The following advice outlines the aspects of the proposal that are of relevance to SARA.

SARA's jurisdiction and fees	
1.	<p><u>Wind Farm</u></p> <p>The application for a Wind Farm will require lodgement to SARA under the following provisions of the Planning Regulation 2017:</p> <ul style="list-style-type: none"> • Schedule 10, Part 21, Division 2, Table 1, Item 1 – Material change of use for a Wind farm. This will require a fee of \$14,538 (13,715 fee units) to be paid in accordance with Schedule 10, Part 21, Division 2 Table 1 Item 5. • Schedule 10, Part 3, Division 3, Table 1, Item 1 – Operation work that is clearing native vegetation. This will require a fee of \$14,538 (13,715 fee units) to be paid in accordance with Schedule 10, Part 3, Table 1, Item 5 c) <p>SARA would be the assessment manager for the proposed application.</p> <p><u>Temporary Met Masts</u></p> <p>The application for Temporary Met Masts (if lodged separated to the wind farm) may require referral to SARA under the following provision of the Planning Regulation 2017:</p> <ul style="list-style-type: none"> • Schedule 10, Part 3, Division 4, Table 3, Item 1 – Material change of use involving the clearing of native vegetation. This will require a fee of \$3,636.00 (3,430 fee units) to be paid in accordance with Schedule 10, Part 3, Division 4, Table 3, Item 8(a).
Key matters and action items	
2.	<ul style="list-style-type: none"> • You are encouraged to investigate and determine a more accurate disturbance footprint, particularly where relevant infrastructure intersects with areas of environmental sensitivity. To be clear, SARA no longer provides for 'micrositing' for the MCU components, relying instead on conditioning a plan which ensures that the location of all infrastructure is generally in accordance.

	<ul style="list-style-type: none"> • Where some ‘flexibility’ may be provided is in the development of the Vegetation Management Plan as part of the Operational Work component. Where clearing intersects with MSES, however, there will be a need to ensure that clearing is limited to the identified clearing footprint to ensure there isn’t any variability in terms of potential offset requirements. At the present time, the proposal plan illustrates some areas of large ‘micrositing’ which would not be supported. • Landowner’s consent will be required for the development application in accordance with the requirements of the <i>Planning Act 2016</i>. SARA recommends continuing engagement with local government(s) to accommodate their broad concerns, noting that SARA will seek their advice during the development assessment process. • The development involves Operational Work for the clearing of native vegetation, including Category B regulated vegetation and essential habitat. This will require a relevant purpose determination to be issued under Section 22a of the <i>Vegetation Management Act 1999</i> to ensure the development does not amount to Prohibited Development in accordance with Schedule 10, Part 3, Division 1 of the <i>Planning Regulation 2017</i>. This must be obtained prior to any lodgement of the development application, as SARA will not accept this application without it (due to it being prohibited development). • It is understood that the project area contains various mapped waterways and may contain unmapped waterways. SARA requires the consideration of stormwater and erosion impacts on waterways within any Ecological Assessment Report, Erosion Risk Assessment and Conceptual Construction Erosion and Sediment Control Plan and Conceptual Decommissioning Management Plan. • Please consider whether any future works within waterways will trigger a referral to SARA for waterway barrier works. Separate pre lodgement advice should be sought on this when more detail is known (if required). • The applicant should consider the Planning guideline State code 23: Wind farm development in the preparation and lodgement of any development application for the wind farm and ancillary infrastructure. The guideline details off the material that should be provided in support of a development application. • Further pre-lodgement advice should be sought once further details regarding impacts on native vegetation and micro siting corridor are known. SARA do not have sufficient information to provide for fit for purpose advice at this stage.
Lodgement material	
3.	<p>It is recommended that the following information is submitted when lodging the application to SARA:</p> <ul style="list-style-type: none"> • DA form 1 • A relevant purpose determination under section 22A of the <i>Vegetation Management Act 1999</i> • A full response to the relevant sections of SDAP <ul style="list-style-type: none"> o State Code 16: Native vegetation clearing o State Code 23: Wind farm development • Landowner’s consent • Relevant plans as per the DA Forms guide <p>The following points are provided for consideration to assist in the preparation of a ‘decision ready’ application that will minimise the likelihood of receiving an Information Request from SARA after lodgement:</p> <ul style="list-style-type: none"> • landowner consents provided in accordance with the requirements of the <i>Planning Act 2016</i> where there are any land uses beyond the general purpose of a road, or in road reserves, landowner’s consent from the relevant road manager is required

	<ul style="list-style-type: none"> • planning reports and site plan(s) should identify locations of turbines and respective distances to sensitive land uses as well as access points for construction vehicles off local government and/or State controlled roads • site plan(s) should also include mapping overlays that show constraints including, but not limited to, mapped and unmapped waterways, fauna habitat, regulated vegetation, and easements • submission of detailed MCU plans showing the full extent of disturbance areas for all site infrastructure including (but not limited to) turbine pads, meteorological mast areas, substations, construction areas, concrete batching plants, quarries, temporary workers' accommodation, and access roads. Specifically, the MCU plans should identify: <ul style="list-style-type: none"> o the proposed project footprint, including the total area of disturbance o turbine locations o indicative locations of other infrastructure including (but not limited to) access tracks, BESS, substations, transmission lines, and construction camps. • to achieve compliance with State Code 23, SARA now conditions the rehabilitation and/or restoration of areas cleared for construction that are not required to stay cleared for operations and maintenance. Applicants are encouraged to submit reports, strategies or other relevant material proposing how rehabilitation and restoration following construction activities will be achieved. These strategies should cover aspects of the site requiring rehabilitation including access tracks of varying cross sections, turbine pads and hardstands, watercourse crossings, sensitive habitat crossings, transmission corridors. This material will be used in conditions of approval. • digital data of the proposed disturbance footprint (proposed area to be cleared) and development envelope (shapefile or KML/KMZ format) should be submitted for assessment. • submission of all detailed reports relevant to the development as described by the SDAP Planning guideline State code 23: Wind farm development
Other Relevant Information	
4.	<p><u>Other approvals</u></p> <ul style="list-style-type: none"> • Any development application that proposes infrastructure over a State-controlled road (such as overhead powerlines) will require a separate approval from the DTMR pursuant to Section 50 of the <i>Transport Infrastructure Act 1994</i>. • Any development application that proposes interference with a railway corridor (such as railway crossing upgrades) will require a separate approval from the DTMR pursuant to Section 255 of the <i>Transport Infrastructure Act 1994</i>. • Interference with certain watercourses may trigger a separate referral to SARA for waterway barrier works. While these applications will be lodged separately these particular waterway crossings should be highlighted in material supporting the wind farm application. • Other approvals will be required for land uses proposed on site that are not deemed 'ancillary' to the wind farm. This would include but not be limited to any proposed land uses that: <ul style="list-style-type: none"> o would be considered Environmentally Relevant Activities (ERAs), including, for example, concrete batching plants, quarries or sewerage treatment for on-site worker's accommodation o are Operational work such for land use activities including, for example, Waterway barrier works, Taking or interfering with water from a watercourse or Bulk earthworks o require a water licence o result in the clearing of protected plants under the <i>Nature Conservation Act</i>

	<p>1992</p> <ul style="list-style-type: none"> o relate to the Reconfiguration of a lot o relate to works that require local or state government roads permits o relate to the movement of excess mass and dimension loads, or of dangerous goods.
5.	<p><u>Temporary Met Masts</u></p> <p>The proposal includes the initial inclusion of four (4) temporary meteorological masts (met masts) that will eventually be replaced by wind turbines. Further information regarding the advice for temporary met masts is included in the related pre-lodgement advice for 2411-43557 SPL (SARA reference).</p> <p>It is unclear whether SARA would be the assessment manager or referral agency for the proposed application for temporary met masts. The applicant should seek advice from the local government to determine whether the development is assessable against the local categorising instrument.</p> <p>Assessable under local categorising instrument</p> <p>If the material change of use for the meteorological masts (met masts) is assessable development under a local categorising instrument, referral to SARA for native vegetation clearing is required in accordance with Schedule 10, Part 3, Division 4, Table 3, Item 1 of the Planning Regulation, as the proposal involves clearing in a category B area.</p> <p>The application will need to address and meet the requirements of the State Development Assessment Provisions (SDAP) – State code 16: Native vegetation clearing (code). The performance outcomes to be addressed in the code are:</p> <ul style="list-style-type: none"> • Table 16.2 – PO1-PO3 • Table 16.8 – PO80-PO92 <p>Performance outcomes requiring a detailed response by the development application include:</p> <ul style="list-style-type: none"> • Clearing avoids and minimises impacts (PO4) • Clearing associated with watercourses and drainage features (PO7, PO8) • Salinity (PO11) • Conserving least concern regional ecosystems where clearing vegetation for temporary use areas (PO12, PO13) <p>The extent of clearing assessed under the code includes all matters defined under ‘clearing as a result of a material change of use’ in the Glossary of Terms. Assessable clearing includes clearing that will become exempt clearing work whether or not it is intended to be undertaken. This includes clearing for firebreaks and safety buffers adjoining proposed infrastructure (other than fences, roads and underground services) for a distance of 20m or 1.5 times the height of the tallest adjacent trees. Providing height measurements for the tallest trees in category B areas adjacent to infrastructure is recommended to identify assessable clearing.</p> <p>Guidance on how to comply with this code is provided in the Guide to State Development Assessment Provisions: State code 16: Native vegetation clearing (material change of use and/or reconfiguring a lot – all other purposes).</p> <p>Accepted under local categorising instrument</p> <p>If the material change of use for the met masts is not assessable under the local</p>

	<p>categorising instrument, the clearing work will constitute operational work – native vegetation clearing. The development may not require an application to SARA for clearing native vegetation under Schedule 10, Part 3 of the Planning Regulation 2017, as it may be undertaken in line with the accepted development requirements under the Accepted Development Vegetation Clearing Code (ADVCC) – Clearing for Infrastructure.</p> <p>The infrastructure proposed can be categorised as a helipad and/or non-linear infrastructure. Notification requirements for accepted development are outlined in the 2.1 and 2.2 of the ADVCC.</p>
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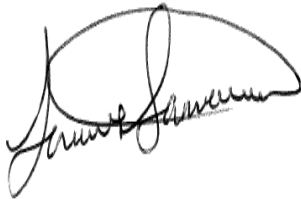
This advice outlines aspects of the proposed development that are relevant to SARA's jurisdiction. This advice is provided in good faith and is:

- based on the material and information provided to SARA
- current at the time of issue
- not applicable if the proposal is changed from that which formed the basis of this advice.

The advice in this letter does not constitute an approval or an endorsement that SARA supports the development proposal. Additional information may be required to allow SARA to properly assess the development proposal after a formal application has been lodged.

For further information please contact Kirsty Geaney, Principal Planning Officer, on 47583414 or via email NQSARA@dSDLGP.qld.gov.au who will be pleased to assist.

Yours sincerely



Javier Samanes
A/ Manager (Planning)

enc Attachment 1 – Pre-lodgement meeting attendance record

Development details	
Proposal:	Wind Farm
Street address:	Duglad River Mine Access Road Cloncurry
Real property description:	Lot 36 on AP23793 and Lot 92 on SP303378
SARA role:	Assessment manager
Assessment Manager:	State Assessment and Referral Agency (SARA)
Assessment criteria:	State Development Assessment Provisions (SDAP): - State code 16: Native vegetation clearing - State code 23: Wind farms
Existing use:	Mining

Attachment 1 — Pre-lodgement meeting attendance record

Meeting attendees:

Name	Position	Organisation
Javier Samanes	A/Planning Manager	SARA
Kirsty Geaney	Principal Planning Officer	SARA
Josh Maunder	Principal Consultant	ERM
Mifanwy Press	Managing Consultant	ERM
Robert James	Proponent	MMG
Daniel Bales	Proponent	MMG