Attachment 3

SARA Prelodgement Meeting Minutes

DELIVERING FOR QUEENSLAND | Queensland Government

Department of
State Development,
Infrastructure and Planning

SARA reference: 2512-49962 SPL
Applicant reference: J001639:GE:SR

27 January 2026

Red Hill Renewable Energy Pty Ltd
C/- Gryphon energy
29 Gilmore Street, Tarragindi
jamesb@gryphonenergy.com.au

Attention: James Basham

Dear James,

SARA Pre-lodgement advice – Rutherglen Battery Energy Storage System

I refer to your pre-lodgement request received on 18 December 2025 and pre-lodgement meeting held on 15 January 2026 (**Attachment 1**) in which you sought pre-lodgement 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 relevant to SARA, based on the documentation uploaded to MyDAS2 on 18 December 2025.

Development details

Summary of proposal:	The proposal seeks advice for a Battery storage facility (BSF) at 837 Red Hill Road, Bororen (the subject site). The BSF is for a utility-scale of 400MW / 1600MWh and includes two (2) Substations, which form part of the established transmission network on-site to convert 33kV electrical energy to 275kV and allow discharge into the transmission grid, as well as regulation, control and switching of voltage and electrical circuits.
Description:	Development Permit for Material Change of Use (MCU) for a Battery Storage Facility
SARA role:	Assessment manager in accordance with Section 21 (5) of the Planning Regulation 2017
SARA jurisdiction:	Schedule 10, Part 2, Division 2, Table 1, Item 1 - Material change of use for battery storage facility
Street address:	837 Red Hill Road, Bororen
Real property description:	Lot 132 on FD700

Pre-lodgement advice

SARA provides the following pre-lodgement advice:

Table 1: SARA advice in response to the applicant's request	
1.	**Advice requested:** a) In relation to PO2-PO7 is it a requirement to demonstrate access to water via a water license or other tenure? b) And does the provision of an agreement/letter from QFD with regard to access, etc., suffice for compliance with PO5?
	SARA's advice: a) In the instance, the development relies on a water license or other tenure for water supply for fire-fighting purposes, documentation to demonstrate that this water can be made available when needed should be provided to address PO7 of State code 27 of the State Development Assessment Provisions (State code 27 of the SDAP). b) With regard to access (PO5), you will need to prepare a Fire Safety Study (FSS), which demonstrates that cleared fire-fighting areas at the interface of hazardous vegetation or asset protection zones (APZ) are accessible. The measures should be justified as part of the overall fire safety strategy as described in the FSS, and the emergency response plan would be developed following consultation with QFD and reflecting the measures agreed in the FSS.
2.	**Advice requested:** In relation to compliance with PO8 and s51(4)(b) of the Planning Act, does the Community Benefit Agreement need to be fully executed? or just agreed to. The situation is that the Social Impact Assessment has been completed and a Community Benefit Agreement has been negotiated, however it cannot be fully executed until the February meeting of Council and accordingly will not be fully executed, although is largely agreed to. Will this create an issue with being not properly made in the first instance? Or will a letter from Council confirming the agreement be sufficient, particularly given the final version will essentially be redacted due to commercial-in-confidence items listed in the agreement?
	SARA's advice: The Community Benefit Agreement will need to be fully executed before SARA will accept the development application as properly made, in accordance with section 51(4)(b) of the *Planning Act 2016*.
3.	**Advice requested:** PO9 - Agricultural land - despite the land not being mapped as 'high quality agricultural land' as defined by the Code, will this need to be demonstrated by a suitably qualified person?
	SARA's advice: Applicants are required to submit an Agricultural Land Assessment (ALA) report that demonstrates the proposal does not result in an unacceptable loss of high-quality agricultural land. The ALA report should address the following: • identify whether the site contains high-quality agricultural land values (as defined in State code 27 of the SDAP) • clarify and map the amount of hectares of high-quality agricultural land the footprint of the BSF will impact • if the number of hectares of impacted high-quality agricultural land is believed to constitute 'no unacceptable loss' - provide a short ALA report supporting this conclusion as evidence of compliance with PO9 - PO12

	Please note: if the project footprint is expected to affect a material quantum (to be determined on a case-by-case basis) of high-quality agricultural land values, a comprehensive ALA must be prepared. Further information on what is included in a comprehensive ALA can be found in the Planning Guideline: State code 27: Battery Storage Facility.
4.	**Advice requested:** PO16-PO19 - when demonstrating 'buffers' - are these based on State Code 16 distances, or those stipulated in planning schemes, or other technical standards or simply by confirmation from an ecologist or engineer?
	SARA's advice: To demonstrate any buffers from waterways, wetlands and drainage lines for PO16-PO19, an Ecological Assessment Report and/or other specialist reporting should be prepared to support any proposed setbacks.
5.	**Advice requested:** PO22-PO23 - Visual Impact - we have photomontages, and it is fully enclosed with an earth berm - is a VIAR required in that instance?
	SARA advice: To demonstrate compliance with PO22, the project should be supported by a Visual Impact Assessment Report (VIAR) which details impacts on defined areas of high scenic and/or landscape amenity and surrounding sensitive receptors, and proposed mitigation measures to manage these impacts. The VIAR should: • outline the scenic amenity context and how it is represented in relevant state and/or local government planning instruments • identify the extent of visibility of the proposal through a Visual Envelope Map (VEM) or 'viewshed' analysis to determine the likely visual catchment of the project, and how topography, vegetation and built structures affect visibility • identify impacted sensitive receptors • include a detailed assessment of the likely visual impacts of the BSF and associated components on sensitive receptors and areas of high scenic and/or landscape amenity • describe how the siting and layout of the BSF components have been arranged to minimise visual impacts, including measures proposed to mitigate and/or manage potential visual impacts once operational. This could include: o avoiding localities with landscape values or scenic amenity o utilising natural features such as land contours to obscure views or siting development below or behind ridgelines where practicable o appropriate use of colours and materiality that complement surroundings such as low- reflectivity materials to avoid glare and reflection, natural or textured materials and earth toned palette to blend into surroundings, and landscaping o siting development to incorporate existing vegetation or introduction of landscaping features such as screen planting or landscape mounding that complement the natural landscape • include visual simulations or photomontages demonstrating the anticipated visual appreciation of the proposed BSF and associated components of the project (including transmission lines and any other ancillary infrastructure) from identified visual catchments.
6.	**Advice requested:** PO29-PO30 - is a letter from Powerlink required to demonstrate that 'appropriate electrical infrastructure is available'?
	SARA's advice: To demonstrate that the proposal has 'appropriate electrical infrastructure' and meets PO30, the

	development should be supported by a plan that shows the location of the indicative electrical connection. As part of the assessment process, 3rd party advice will be sought from Powerlink, and therefore engagement is encouraged and welcome to support the proposal. Connection and supply elements of the project to be delivered 'generally in accordance with' their depiction on an approved project layout plan.
7.	**Advice requested:** a) PO31-35 Guidelines on decommissioning/battery recycling - are these still in development and when will they be released? b) What is the expectation at submission in relation to this with respect to Decommissioning Security Report (again, considering the majority of the information will be commercial in confidence)?
	SARA advice: a) SARA is currently preparing additional guidance on the requirements for the Decommissioning Security Report, including the timing of its provision and the management of commercially sensitive information. b) To demonstrate compliance with PO35, to project should be supported by a Decommissioning Security Report. This report needs to provide evidence of the proposed financial security (bonds, financial guarantees or similar) that will ensure compliance with decommissioning at the end of construction and at the end of operations, at no cost to landowners (that are not project operators) or the government.

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.

This advice 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 when a formal application has been lodged.

If you require further information, please contact Amber Can, Senior Planning Officer, on (07) 5644 3227 or via email renewablesplanning@dsdip.qld.gov.au, who will be pleased to assist.

Yours sincerely

Thomas Gardiner
Principal Planning Officer

Attachment 1 — Pre-lodgement meeting attendance and minutes

Meeting date	15 January 2026
Meeting location	Microsoft Teams
Meeting chair	Amber Can

Meeting attendees:

Name	Organisation
James Basham	**Gryphon Energy**
Cameron Charlton	**Gryphon Energy**
Sera Rohan	**Gilvear planning**
Taylor Horton	**Gilvear planning**
Raghu Raman	**Arriscar**
Fergus Rourke	**Ampyr Australia**
Jasmine Butler	**Queensland Fire Department (QFD)**
Mark Halverson	**QFD**
Michael Beecroft	**QFD**
Megan Maurer	**QFD**
Thomas Gardiner	**State Assessment and Referral Agency (SARA)**
Faith Duffy	**SARA**
Amber Can	**SARA**
Andrew Durer	**Matrix Acoustics**