

Regional Interests Assessment Application Report

Saraji East Mining Lease Project - 66 kilovolt Powerline

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Saraji East Mining Lease Project - 66 kilovolt Powerline

Client: BM Alliance Coal Operations Pty Ltd

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Executive Summary

AECOM Australia Pty Ltd (AECOM) has been engaged by BM Alliance Coal Operations Pty Ltd (BMA) to seek a regional interests development approval (RIDA) for the proposed activity and an amendment to the Queensland Government Strategic Cropping Land (SCL) trigger map for additional land.

The 'proposed activity' is the construction of a new overhead 66 kilovolt (kV) powerline for the Saraji East Mining Lease Project (SEMLP) (the Project), which traverses Strategic Cropping Area (SCA).

The proposed activity is required to support the provision of power to the Project that will be supplied by the existing Ergon Supply (Dysart 66 kV supply to Saraji Mine), located south of the Project Site.

The Project is located near Dysart within the Isaac Regional Council (IRC) Local Government Area (LGA), with the Proposed Activity Footprint located on Lot 101 on SP310393. The extent of verified SCL within the SCL Assessment Area that is associated with this application is also located on 101 on SP310393.

The assessment application report prepared by AECOM supports the application to obtain a RIDA under the *Regional Planning Interests Act 2014* (RPI Act) for the proposed activity and to change the SCL trigger map.

This report and supporting technical documents provide an assessment against the relevant assessment benchmarks, including Schedule 2, Part 4 of the Regional Planning Interests Regulation 2014 (RPI Regulation) for the proposed activity, and Schedule 3, Part 2 of RPI Regulation to verify actual and non SCL areas. Key findings from the assessment include:

- The proposed activity does not include any permanent works and is temporary in nature as it will ultimately be removed and the land subject to the expected area of impact will be restored to its pre-activity condition
- The Proposed Activity Footprint width has been minimised to the greatest extent possible and will impact approximately 13.6 ha of verified SCL, representing 0.41% of SCL on property (SCL)
- The alignment for the proposed activity represents the logical location that is a direct route which is aligned and directly adjacent to existing infrastructure easements, and
- 637 ha of the SCL assessment area (1965 ha) within the SCL trigger map does not meet the SCL criteria.

Following assessment against the relevant criteria for the abovementioned components, the report recommends:

- approval of the assessment application for a RIDA subject to reasonable and relevant conditions, and
- an update to the Queensland Government SCL trigger map to accurately reflect areas of verified SCL and removal of areas of non-SCL that do not meet the criteria for SCL.

1.0 Introduction

This report has been prepared by AECOM Australia Pty Ltd (AECOM) for BM Alliance Coal Operations Pty Ltd (BMA) in support of:

- an assessment application for a regional interests development approval (RIDA) under Part 3, Division 2 of the *Regional Planning Interests Act 2014* (RPI Act), and
- amendment to the Queensland Government Strategic Cropping Land (SCL) trigger map for additional land.

1.1 Purpose

The purpose of this report is to provide an overview of the proposed activity and assess the activity's impacts on the Strategic Cropping Area (SCA) as well as establish the verification of actual SCL in the surrounding areas that is subject to the SCL trigger map.

Following assessment against the relevant criteria for the below described components, the report recommends:

- approval of the assessment application for a RIDA subject to reasonable and relevant conditions, and
- an update to the Queensland Government SCL trigger map to accurately reflect areas of verified SCL and removal of areas of non-SCL that do not meet the criteria for SCL.

1.1.1 Assessment application for a RIDA

The 'proposed activity' is the construction of a new overhead 66 kilovolt (kV) powerline for the Saraji East Mining Lease Project (SEMLP) (the Project). The proposed activity will extend off-lease and connect to the Dysart Substation, south of the Project, and will traverse Strategic Cropping Area (SCA) throughout its proposed alignment.

The proposed activity's impact on the SCA has been assessed against the relevant criteria, being the required outcomes and prescribed solutions outlined in Schedule 2, Part 4 of the Regional Planning Interests Regulation 2014 (RPI Regulation), to identify any constraints on the configuration or operation of the activity.

1.1.2 SCL trigger map amendment

This report also demonstrates the extent of actual SCL identified within the Queensland Government SCL trigger map and located within the broader Project Site. Actual SCL has been identified through the assessment of site-specific soil conditions against the SCL criteria listed in Schedule 3, Part 2 of the Regional Planning Interests Regulation 2014 (RPI Regulation).

1.2 Application Details

A summary of the assessment application detail is included in Table 1.

To satisfy the requirements for the RIDA assessment application and the request for the SCL mapping amendment, the application is supported by the approved form (Appendix A), the applicable fee and this report which:

- Assesses the proposed activity's impact on the area of regional interest
- Identifies any constraints on the configuration / operation of the activity
- Provides information on the location of the land where amendment to the SCL trigger map is proposed and sufficient evidence to demonstrate that the land mapped as SCL on the SCL trigger map is not SCL.

This report has been developed in accordance with relevant RPI Act statutory guidelines and is supported by the following:

- SCL Assessment Report (Appendix B)
- Title searches (Appendix D)
- Restoration Plan (Appendix C)
- GIS spatial data files (Appendix E)

Table 1 Assessment application details

Assessment application details	
Applicant	BM Alliance Coal Operations Pty Ltd (BMA) c/- AECOM Australia Pty Ltd (AECOM)
Application type	<ul style="list-style-type: none"> Assessment application for a RIDA, and Amendment to the Queensland Government SCL trigger map
Application fee	\$26,977.00 (based on an area of mapping change of 100 hectares or more)
Area of regional interest	Strategic Cropping Area
Address and real property description	540 Lake Vermont Road, Dysart, QLD 4745 (Lot 101 on SP310393)
Landowner details	Landowners for Lot 101 on SP310393: <ul style="list-style-type: none"> BHP Coal Pty Ltd Umal Consolidated Pty Ltd BHP Queensland Coal Investments Pty Ltd Mitsubishi Development Pty Ltd QCT Investment Pty Ltd QCT Mining Pty Ltd QCT Resources Pty Ltd
Tenements	<ul style="list-style-type: none"> Mining Lease Application (MLA) 70383 Mining Lease (ML) 1782 Exploration Permit Coal (EPC) 837
Proposed Activity Footprint / expected area of impact	<ul style="list-style-type: none"> 21 hectares (ha) (35 m wide corridor for approximately 6.04 km) comprising: <ul style="list-style-type: none"> 13.6 ha verified SCL 7.4 ha non-SCL area
SCL Assessment Area within Lot 101 on SP310393	<ul style="list-style-type: none"> 1965 ha (SCL trigger map): <ul style="list-style-type: none"> 1328 ha verified SCL 637 ha non-SCL area
Application contact details	Haidar Etemadi Environmental Planner PO Box 1307 Fortitude Valley QLD 4006 E: Haidar.Etemadi@aecom.com M: 0431 012 330
Applicant reference	60507031

1.3 Pre-Application Advice

An initial pre-application meeting was held with the former Department of State Development, Manufacturing, Infrastructure and Planning (DSDMIP) and the former Department of Natural Resource, Mines and Energy (DNRME) on 14 November 2018. Following that meeting a draft SCL Assessment Report and associated figures were provided to the departments for preliminary review. Preliminary comments were provided by the departments on 30 November 2018 and 5 February 2019.

A further pre-application meeting was undertaken with the Queensland Treasury (QT) and DNRME on 21 October 2020. Through the pre-application meeting and subsequent minutes, QT and DNRME provided advice with regards to application requirements, likelihood of permanent impacts, preparation of a restoration plan to negate mitigation conditions requiring payment (per mitigation value prescribed by the RPI Regulation), condition timing, and SCL mapping clarification.

The matters discussed within the pre-application meetings have been addressed within this assessment application.

A copy of the pre-application meeting minutes undertaken on 21 October 2020 are provided in Appendix F.

1.4 Saraji East Mining Lease Project Background

BMA proposes to develop the Project, being a greenfield single-seam underground mine development on Mining Lease Application (MLA) 70383 commencing from within Mining Lease (ML) 1775. The Project also comprises supporting infrastructure, including a Coal Handling Preparation Plant, a Mine Infrastructure Area, a conveyor system, rail spur and balloon loop, water pipelines and dams, powerlines, stockpiles and a construction accommodation village. Some infrastructure utilised for the Project will be located on the adjacent Saraji Mine MLs as well as on MLA 70383 and MLA 70459.

The Project will mine up to 11 million tonnes per annum (Mtpa) and produce up to 8 Mtpa of product coal for the export market over a 20-year production schedule (FY 2023 – 2042). Excluding ramp up and ramp down periods, the Project anticipates the production of an annual average of 6.2 Mtpa of product coal over the life of mine.

The key objectives of the Project are to:

- utilise BMA owned land on the adjacent existing Saraji Mine MLs to minimise the environmental impacts from additional infrastructure and to provide Project efficiencies
- operate a profitable Project to provide high-quality hard coking coal, semi hard coking coal and pulverised coal injection coal to the export market
- design, construct and operate a Project that:
 - minimises adverse impacts on the surrounding bio-physical and social environments
 - complies with all relevant statutory obligations and continues to employ processes which enhance sound environmental management.

The Project is currently undergoing the environmental impact statement (EIS) assessment process with the Department of Environment and Science (DES) under Chapter 3 of the *Environmental Protection Act 1994* (EP Act).

BMA has been issued the final terms of reference (ToR) and has recently submitted the EIS. The decision date for DES to decide if the EIS is to be released publicly has been extended to 30 April 2021.

2.0 Site Description

2.1 Regional Context

The Project is located within the Isaac Regional Council (IRC) Local Government Area (LGA), approximately 30 kilometres (km) north of Dysart and 170 km southwest of Mackay in Queensland. The location of the Project and its regional context is presented in Figure 1.

2.2 Local Context

The area of interest associated with this application is located towards the southern end of the 'Project Site', which includes the 'SCL Assessment Area' and the 'Proposed Activity Footprint'.

2.2.1 Project Site

The Project Site is located adjacent to the existing Saraji Mine which BMA currently operates. The Project Site consists of Exploration Permit for Coal (EPC) 837, EPC 2103, MLA 70383, MLA 70459 and components of the Project would operate within MLs at the existing Saraji Mine (ML 1775, ML 70142 and ML 1782) under the existing EA.

The Project Site encompasses approximately 11,427 hectares (ha) of land. Mining and the infrastructure required to support the Project is not proposed within the full extent of the Project Site with direct impacts constrained to a smaller area of some 3,425 ha.

2.2.2 Proposed Activity Footprint

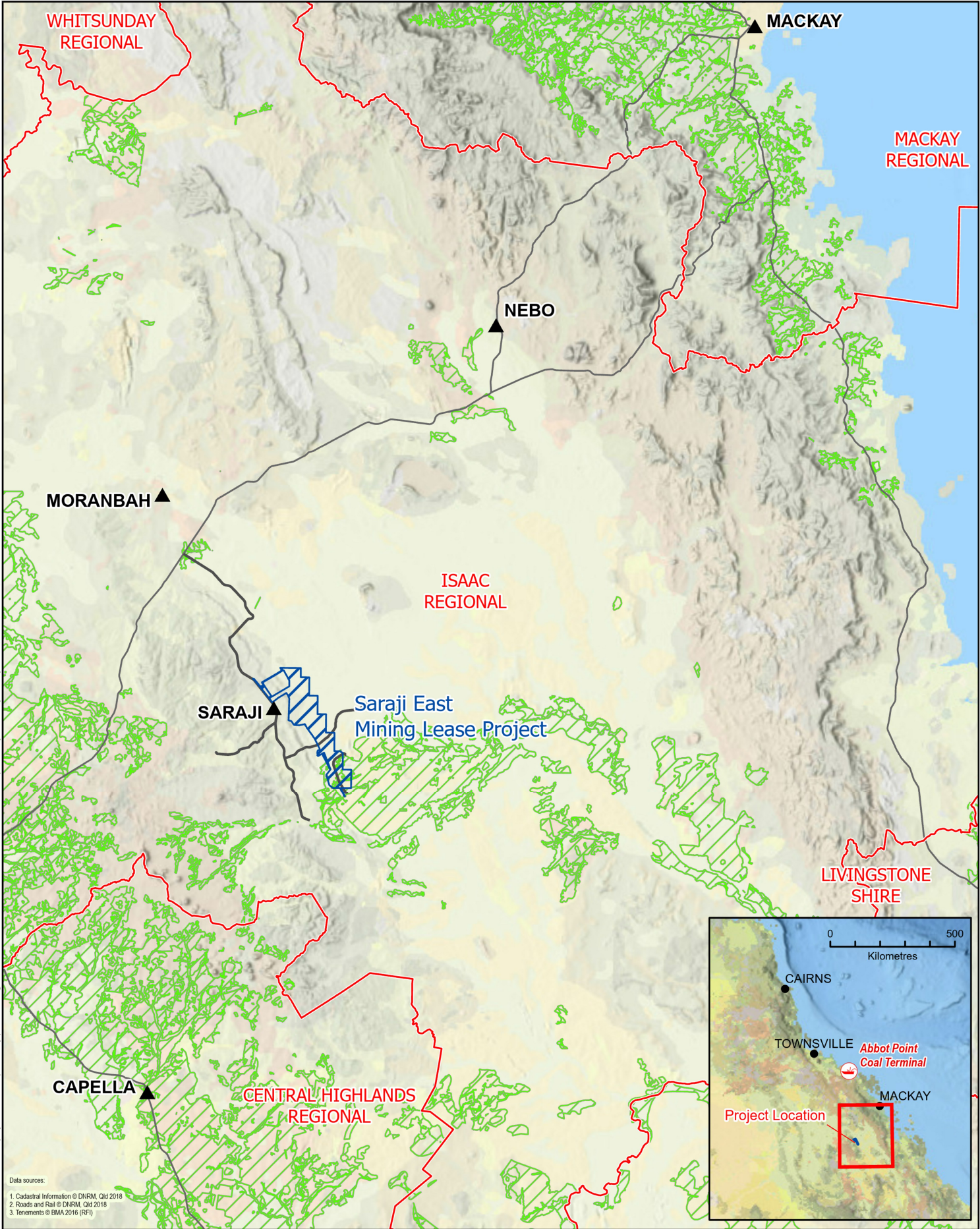
The Proposed Activity Footprint relevant to this assessment application is a 35 m wide corridor approximately 6.04 km long with a total area of 21 ha, located within the SCL trigger map, which is the area required for the construction and operation of the proposed activity. The Proposed Activity Footprint sits adjacent to and follows the alignment of existing easements that traverse the SCA; directly abutting the westernmost existing easement (refer Figure 2).

The expected area impact on SCL as a result of the Proposed Activity Footprint is the overlap of corridor with the areas of 'verified SCL', confirmed through the Project Site wide verification of SCL.

2.2.3 SCL Assessment Area

The SCL Assessment Area relevant to this assessment application is the extent of land within the SCL trigger map sited within lot 101 on SP3109393. The assessment for actual SCL has been undertaken against the criteria (as outlined Schedule 3, Part 2 of RPI Regulation) and identified as either 'verified SCL' or 'non-SCL Area' (where the SCL criteria is not met) (refer Figure 3). The assessment and verification process of SCL is detailed in the SCL Assessment Report undertaken by GT Environment (Appendix B).

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Data sources:
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2. Roads and Rail © DNRM, Qld 2018
3. Tenements © BMA 2016 (RFI)

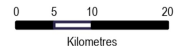
LEGEND

- Project Site
- Public Road
- Local Government Areas
- Strategic Cropping Land (trigger map)



Figure 1
Regional Context

RIDA Application
Saraji East Mining Lease Project

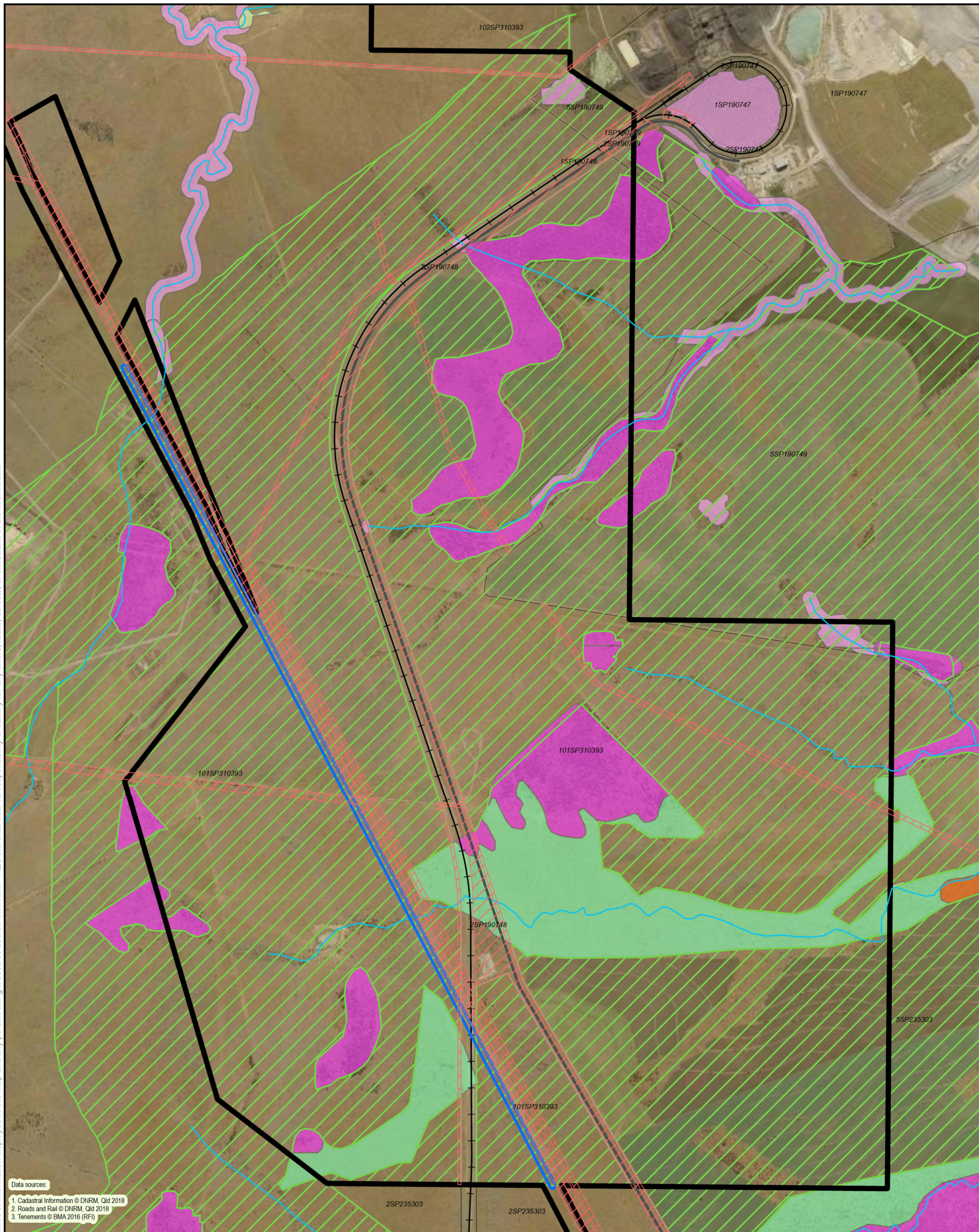


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Projection: Map Grid of Australia - Zone 55 (GDA94)



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- LEGEND**
- Project Site
 - Easement
 - Existing Railway
 - Public Road
 - Watercourses and Drainage
 - Features
 - Cadastral Boundary
 - Proposed Activity Footprint

Strategic Cropping Land
(trigger map)

Vegetation Management Regional Ecosystems

- Category A or B area containing endangered
- Category A or B area containing of concern
- Category A or B area that is least concern
- Category C or R area containing endangered
- Category C or R area containing of concern
- Category C or R area that is of least concern



Figure 2
General Site Layout

RIDA Application
Saraji East Mining Lease Project

0 0.25 0.5 1
Kilometres

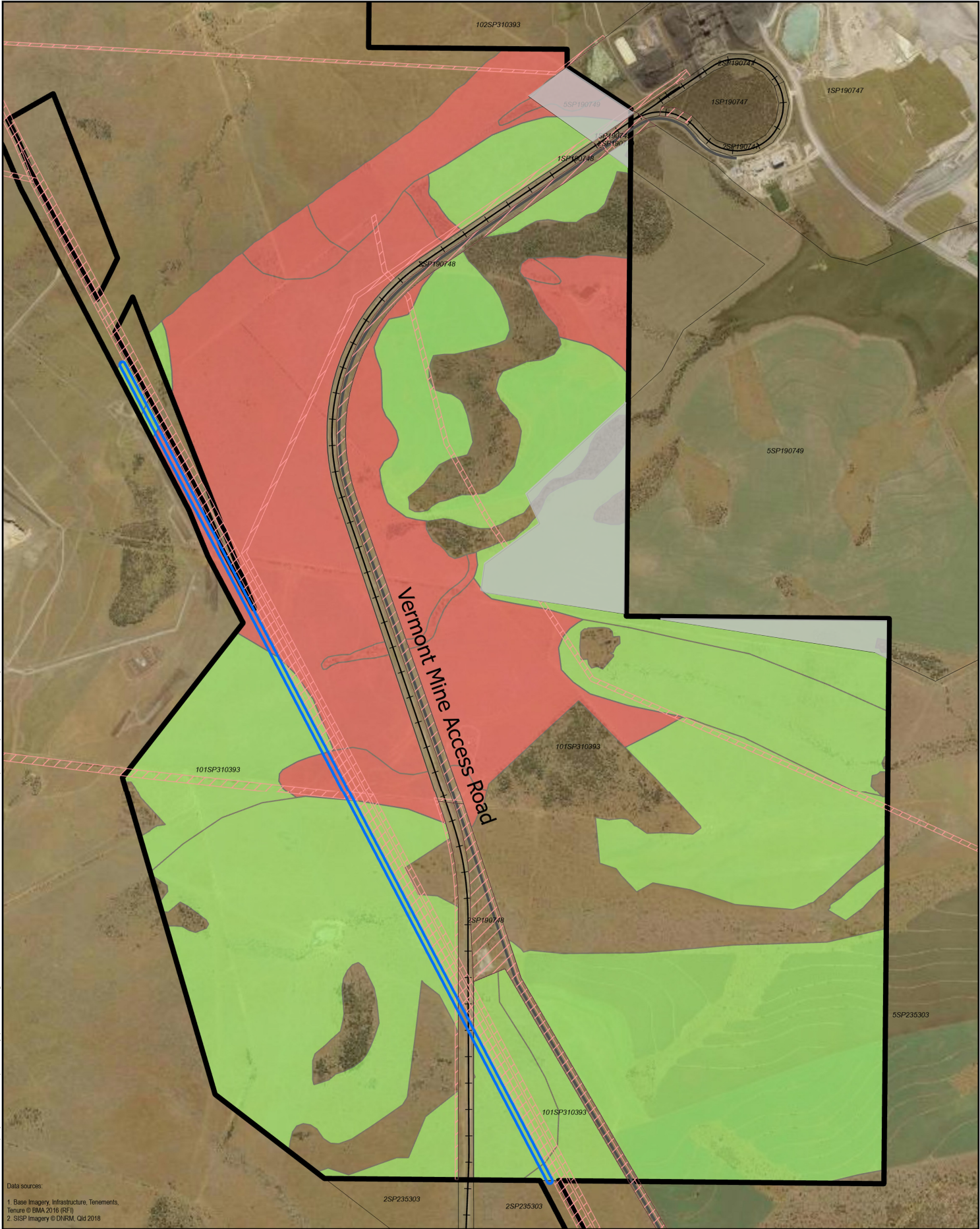
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Data sources:
1. Base Imagery, Infrastructure, Tenements, Tenure © BMA 2016 (RFI)
2. SISIP Imagery © DNRM, Qld 2018

LEGEND

- Project Site
- Cadastral Boundary
- Proposed Activity Footprint
- Easement
- Public Road
- Existing Railway

SCL Assessment Area

- SCL Verified (Assessed Area)
- Non-SCL (Assessed Area)
- Lot 5 on SP190749 not subject to RIDA application

Figure 3
Strategic Cropping Land

RIDA Application
Saraji East Mining Lease Project

0 0.25 0.5 1
Kilometres

Scale: 1:32,500 (when printed at A4)
Projection: Map Grid of Australia - Zone 55 (GDA94)

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2.3 Land Tenure and Tenement

Resource tenements subject to the Activity Footprint and the SCL Assessment area include EPC 837 (granted EPC), MLA 70383 (proposed mining lease) and ML 1782 (existing mining lease) (refer Figure 4).

The Proposed Activity Footprint and the SCL Assessment Area (for SCL mapping change) are situated within a freehold lot (Lot 101 on SP310393). A summary of the property and tenure details is provided in Table 2.

Table 2 Property details

Property	Address	Area (ha)	Tenure	Owners
Lot 101 on SP310393	540 Lake Vermont Road, Dysart, QLD 4745	16031	Freehold	Central Queensland Coal Associates (CQCA) Joint Venture, namely: <ul style="list-style-type: none"> BHP Coal Pty Ltd Umal Consolidated Pty Ltd BHP Queensland Coal Investments Pty Ltd Mitsubishi Development Pty Ltd QCT Investment Pty Ltd QCT Mining Pty Ltd QCT Resources Pty Ltd

BMA acts on behalf of the CQCA Joint Venture who is the owner of Lot 101 on SP31039.

The proposed activity crosses Lot 1 on SP190748 that contains the Lake Vermont Spur Railway (a freehold property owned by Bowen Basin Coal Pty Ltd) however it is not mapped to be within a regional interest area and therefore is not considered as part of this assessment application.

A title search for Lot 1 on SP190748 has been undertaken on 28 January 2021 (contained in Appendix D).

2.4 Site Features

Existing features within the Proposed Activity Footprint and the SCL Assessment Area are summarised in Table 3, which have been identified through the Project EIS assessment process and desktop review of publicly available information from government databases and imagery.

Table 3 Existing site features

Feature	Proposed Activity Footprint	SCL Assessment Area
Land use	Mainly 'Grazing native vegetation' with a minor section of the footprint crossing over 'Transport and communication' (Goonyella System Railway) as classified under the Australian Land Use and Management Classification System (ALUM) (Version 8). Refer Figure 5.	Mainly 'Grazing native vegetation' as classified under ALUM (Version 8). Refer Figure 5.
Native title	A search of the NNTT online Native Title Vision mapping did not identify any claims or determinations over the Proposed Activity Footprint.	A search of the NNTT online Native Title Vision mapping did not identify any claims or determinations over the SCL Assessment Area.
Easements	Whilst the Proposed Activity Footprint is directly adjacent to the western border of	In addition to the easements adjacent to the Proposed Activity Footprint, the SCL

Feature	Proposed Activity Footprint	SCL Assessment Area
	<p>easement AB/AA on SP215965, it is not within an existing easement.</p> <p>Existing easements adjacent to the eastern side of the Proposed Activity Footprint include the following:</p> <ul style="list-style-type: none"> - ACNS68 (6.864 ha) for infrastructure - BCNS120 (9.477 ha) for infrastructure - ACSP215966 (5.879 ha) for infrastructure - ABSP215965 (3.01 ha) for infrastructure - AASP215965 (Dealing # 711888334), width 20m (5.243 ha), BHP private supply line, voltage 66kv - DRP619505 (Dealing # 601129747), width 32m (28.71 ha), BHP private supply line, voltage 66kv - CRP616865 (Dealing # 601129746), width 33m (14.1539 ha), Powerlink, voltage 132kv - ESP193812 (Dealing # 710384481), width 30m (12.75 ha), Ergon Energy, Voltage 66kv <p>Refer Figures 2, 4 and 6.</p>	<p>Assessment Area covers the following easements:</p> <ul style="list-style-type: none"> - FSP193813 (16.32 ha) for infrastructure - GSP193814 (1.0270 ha) for infrastructure - MSP209940 (1.34 ha) for infrastructure - FSP206112 (21.27 ha) for infrastructure - LSP209940 (5.412 ha) for infrastructure - KSP209940 (12.06 ha) for infrastructure - KSP268767 (4.966 ha) for infrastructure <p>Refer Figures 2, 4 and 6.</p>
Indigenous land use agreements (ILUA)	<p>The following ILUA overlap the Proposed Activity Footprint:</p> <ul style="list-style-type: none"> - Arrow Barada Barna People LNG Project ILUA (QI2011/031) (date of registration 14 December 2011) - Barada Barna and Ergon Energy ILUA (QI2016/008) (date of registration 30 August 2016) - QGC and Barada Barna ILUA (QI2012/062) (date of registration 21 September 2012) - Barada Barna People and Local Government ILUA (QI2016/007) (date of registration 29 August 2016) 	<p>The following ILUA overlap the SCL Assessment Area:</p> <ul style="list-style-type: none"> - Enertrade – BBKY #4 CQGP Agreement (QI2006/028) (date of registration 16 November 2006) - Arrow Barada Barna People LNG Project ILUA (QI2011/031) (date of registration 14 December 2011) - Barada Barna and Ergon Energy ILUA (QI2016/008) (date of registration 30 August 2016) - QGC and Barada Barna ILUA (QI2012/062) (date of registration 21 September 2012) - Barada Barna People and Local Government ILUA (QI2016/007) (date of registration 29 August 2016)
Roads and rail	<p>A number of informal and unnamed roads traverse the Proposed Activity Footprint.</p> <p>The Lake Vermont rail spur crosses through the footprint. The spur is part of the Goonyella system. The Goonyella system is</p>	<p>Numerous informal and unnamed roads pass through the SCL Assessment Area.</p>

Feature	Proposed Activity Footprint	SCL Assessment Area
	an electrified train system located in central Queensland, which services the Bowen Basin coal region.	
Flora and Fauna	The Proposed Activity Footprint is not within areas of protected vegetation regulated under the <i>Vegetation Management Act 1999</i> (VM Act). Refer Figure 2.	Minor areas within the SCL Assessment Area are identified as Category C and R containing endangered regional ecosystems under the VM Act. Refer Figure 2.
Water	<p>An unnamed tributary of Downs Creek that is a drainage feature under the <i>Water Act 2000</i> (Water Act) crosses the middle section of the Proposed Activity Footprint.</p> <p>An unmapped feature under the Water Act crosses the northern end of the Proposed Activity Footprint.</p> <p>The abovementioned drainage feature and unmapped feature are also identified as green (low risk of impact) waterways for waterway barrier works.</p> <p>No defined watercourses under the Water Act are identified within the Proposed Activity Footprint.</p> <p>Refer Figure 2.</p>	<p>Three unnamed tributaries of Downs Creek that are identified as drainage features under the Water Act traverse the SCL Assessment Area.</p> <p>Two unmapped features under the Water Act occur within the SCL Assessment Area.</p> <p>The abovementioned drainage features and unmapped features are also identified as green (low risk of impact) waterways for waterway barrier works.</p> <p>No defined watercourses under the Water Act are identified within the SCL Assessment Area.</p> <p>Refer Figure 2.</p>
Queensland Agricultural Land Audit	<p>The Proposed Activity Footprint is subject to the following values under the Queensland Agricultural Land Audit:</p> <ul style="list-style-type: none"> - Important Agricultural Areas (IAA) – land that has all of the requirements for agriculture to be successful and sustainable, is part of a critical mass of land with similar characteristics and, is strategically significant to the region or the state - Agricultural land class A – crop land that is suitable for a wide range of current and potential crops with nil to moderate limitations to production) - Pasture production, and - Potential agriculture (such as annual horticulture, native forestry, broadacre cropping, intensive livestock and pasture production). <p>There are no current sheep feedlots, poultry farms, piggeries or cattle feedlots mapped within the Proposed Activity Footprint.</p>	<p>The SCL Assessment Area is subject to the following values under the Queensland Agricultural Land Audit:</p> <ul style="list-style-type: none"> - IAA - Agricultural land class A - Broadacre cropping - Pasture production - Potential agriculture (such as annual horticulture, native forestry, broadacre cropping, intensive livestock and pasture production). <p>There are no current sheep feedlots, poultry farms, piggeries or cattle feedlots mapped within the SCL Assessment Area.</p>
Topography	The topography of the Proposed Activity Footprint is relatively flat and generally described as gently undulating.	The topography of the SCL Assessment Area is relatively flat and generally described as gently undulating. The northern half is described to contain level

Feature	Proposed Activity Footprint	SCL Assessment Area
		plains and the southern half may contain more undulating land.
Soils	<p>The soil type within the northern section of the Proposed Activity Footprint is generally described as uniform fine cracking, smooth faced peds, grey clay horizon underlain by grey/mottled clay.</p> <p>The soil type towards the southern half is generally described as uniform fine cracking, smooth faced peds, dark clay horizon underlain by brown/mottled clay.</p> <p>Site-specific soil studies have been undertaken for the purposes of this application report. Further details are discussed in 3.0 of this report.</p>	<p>The soil type within the northern section of the Proposed Activity Footprint is generally described as uniform fine cracking, smooth faced peds, grey clay horizon underlain by grey/mottled clay.</p> <p>The soil type towards the southern half is generally described as uniform fine cracking, smooth faced peds, dark clay horizon underlain by brown/mottled clay.</p> <p>Site-specific soil studies have been undertaken for the purposes of this application report. Further details are discussed in 3.0 of this report.</p>

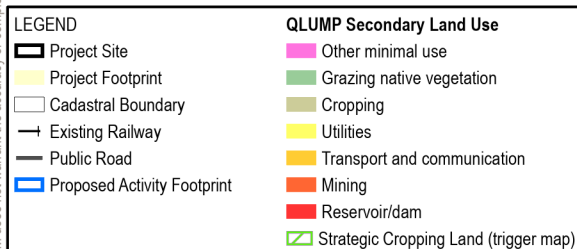
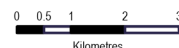


Figure 5
Land Use and
Homesteads

**RIDA Application
Saraji East Mining Lease Project**

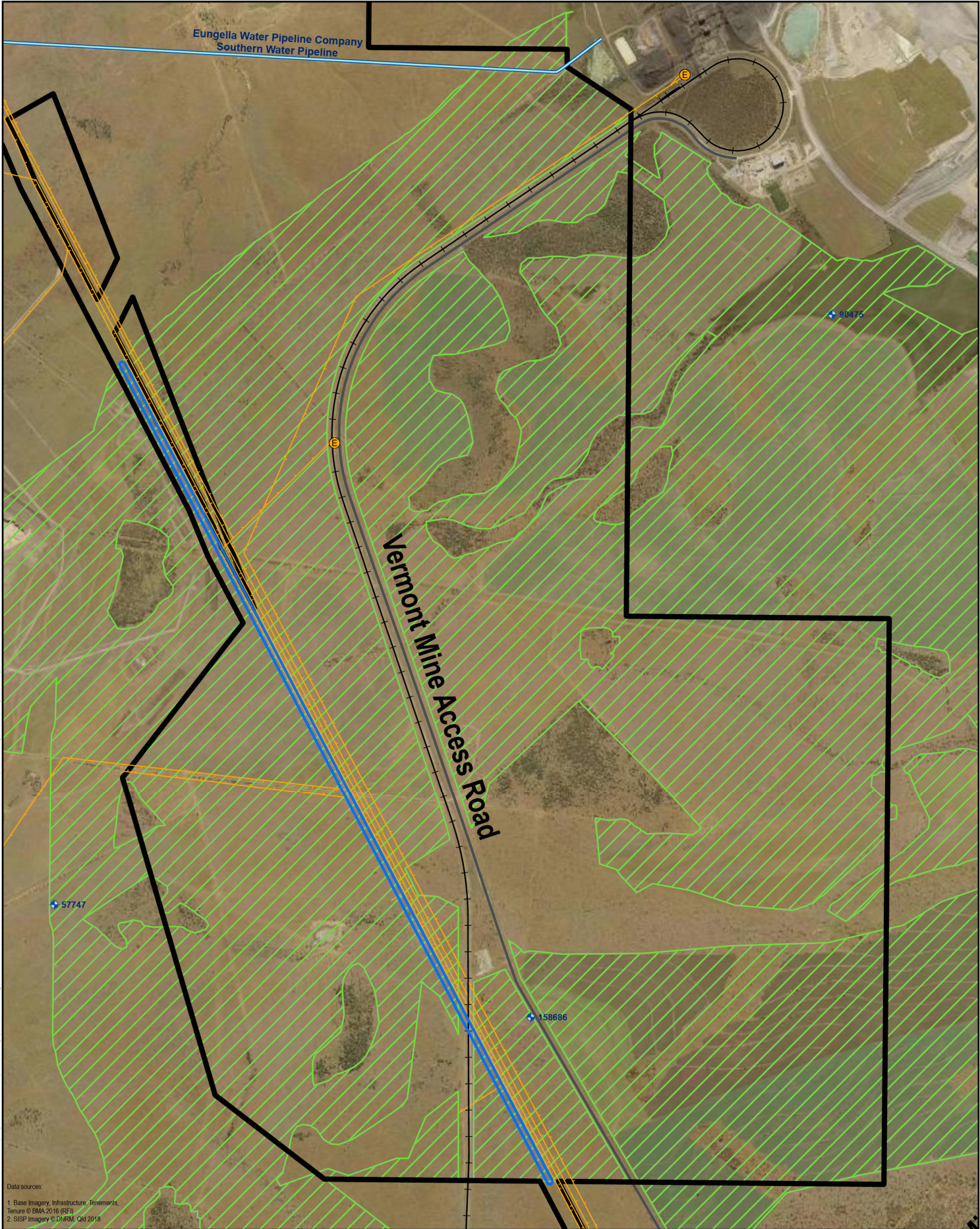


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2. SISIP Imagery © DNRM, Qld 2018

LEGEND <ul style="list-style-type: none">Project SiteProject FootprintLot 101SP310393Existing RailwayPublic RoadWater PipelinePowerlineProposed Activity Footprint	Existing Infrastructure <ul style="list-style-type: none">SubstationRegistered Groundwater BoreStrategic Cropping Land (trigger map)	Figure 6 Existing Infrastructure RIDA Application Saraji East Mining Lease Project 0 0.25 0.5 1 Kilometres Scale: 1:32,500 (when printed at A4) Projection: Map Grid of Australia - Zone 55 (GDA94)	BHP DATE: 17/12/2020 VERSION: 6
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3.0 Strategic Cropping Land

SCL is within the SCA and is defined in section 10 the RPI Act as “...land that is, or is likely to be, highly suitable for cropping because of a combination of the land’s soil, climate and landscape features.”

The SCL trigger map that indicates the location of potential SCL is mapped within the southern extent of the Project Site. Areas within the SCL trigger map and the Project Site boundaries are identified as the SCL Assessment Area for the purposes of this application. The Proposed Activity Footprint is also within this area.

An assessment of site-specific soil conditions against the SCL criteria (as outlined Schedule 3, Part 2 of RPI Regulation) has been undertaken within the SCL Assessment Area to verify actual and non SCL areas. The following sections summarise the assessment and conclusions of the SCL Assessment Report (Appendix B).

3.1 SCL Assessment

The SCL assessment was conducted in accordance with RPI Act Statutory Guideline 08/14, and the SCL criteria listed in Schedule 3, Part 2 of the RPI Regulation. The assessment comprised:

- A desktop study of relevant information, including satellite imagery, topographic information and regional soils information
- A field investigation to ground-truth the preliminary soil mapping and collect detailed information on soil distribution, topographic constraints, and physical and chemical soil conditions
- Ground-truthed soil mapping at an appropriate scale for SCL assessment, and
- Site-specific assessment of SCL map unit polygons against the relevant SCL criteria (refer Table 4).

To demonstrate that the land does not meet the SCL criteria, the assessment must demonstrate that it fails at least one of the eight criteria.

Table 4 Criteria to meet SCL in the Western Cropping zone

Criteria	Thresholds for Western Cropping Zone
Slope	Equal to or less than 3%
Rockiness	Equal to or less than 20% for rocks greater than 60mm in diameter
Gilgai	Less than 50% of land surface being gilgai of greater than 500mm in depth
Soil depth	Equal to or greater than 600mm
Soil wetness	Has favourable drainage
Soil pH	For rigid soils, the soil at 300mm and 600mm soil depth must be within the range of pH1:5 5.1 to pH1:5 8.9 inclusive For non-rigid soils, the soil at 300mm and 600mm soil depth must be greater than pH1:5 5.0.
Salinity	Chloride content is less than 800mg/kg at 600mm soil depth
Soil water storage	Equal to or greater than 100mm to a soil depth or soil physico-chemical limitation of equal to or less than 1000mm

3.2 SCL Assessment Conclusion

The SCL assessment identified a total of 17 map units within the SCL Assessment Area. The map units were assessed against the SCL criteria (Table 4). A summary of each map unit and the findings of the assessment are summarised in Table 5.

Table 5 Summary of map units and SCL assessment

Map unit	Concept	Australian Soil Classification	SCL criteria exceedances	SCL status
1	Mixed brigalow scrub on black cracking clays	Black Dermosol	Soil pH – Sites N6-SCL, N7-SCL and N8-SCL	Not SCL
2	Dark black sands with sandy loam subsoils near drainage lines	Black Dermosol	Soil pH – Sites N17, N18 and N19	Not SCL
3	Dark black clay soils on cleared gently undulating plains	Black Vertosol	No SCL criteria exceedances reported	Likely SCL
4	Dark grey, greyish brown sandy loams to sandy clay loams near drainage lines	Black Dermosol	Soil pH – Sites N21 and N22 Chemical limitation for PAWC – Site N20	Not SCL
5	Black duplex sandy loam to clay soils on gently undulating plains with mixed tall to medium spars eucalyptus species	Black dermosol (with minor grey dermosol variant)	Soil pH – Sites N4-SCL, N5-SCL and N9-SCL	Not SCL
6	Dark sandy clay with coarser structured clay subsoils on gently undulating plains	Black Dermosol	Soil pH – Sites N26, N27, N32 and 80-SCL Soil water storage – Site 91-SCL	Not SCL
7	Crusting grey clay with subdominant black soils on gently undulating plains with mixed shrubbery	Crusting Grey Vertosol (with minor black vertosol variant)	No SCL criteria exceedances reported	Likely SCL
8	Dark greyish brown weak to moderately structured clay soils on cleared gently undulating plains	Black Dermosol	No SCL criteria exceedances reported	Likely SCL
9	Uniform to slightly gradational black vertosol on gently undulating plains used for cropping	Black Vertosol	No SCL criteria exceedances reported	Likely SCL
10	Deep sandy clay loams with clay subsoils on gently undulating plains of tall woodlands	Black Dermosol	Soil pH – Sites N28 and N43	Not SCL
11	Dark grey clay loams to grey brown clays within forested drainage line areas.	Grey Dermosol	Soil pH – Sites N23, N24 and N25	Not SCL
12	Black, well-structured clays on gently undulating cropping land	Black Vertosol	No SCL criteria exceedances reported	Likely SCL
13	Black, well-structured clays on gently undulating cropping land	Black Vertosol	Soil pH – Site 7-SCL Remaining two sites have no SCL criteria exceedances reported	Likely SCL
14	Texture contrast sandy loams over red clay subsoils on cleared gently undulating plains	Red Chromosol	Soil water storage – Site 10-SCL, N41 and N42	Not SCL
15	Dark uniform to gradational clay soils on lower sloped plains and open depression	Black Vertosol	No SCL criteria exceedances reported	Likely SCL

Map unit	Concept	Australian Soil Classification	SCL criteria exceedances	SCL status
16	Dark brown clay soils with gilgai microrelief on gently undulating plains of mixed regrowth	Black Vertosol	No SCL criteria exceedances reported	Likely SCL
17	Dark cracking clays on basalt with cropping on undulating plains	Black Vertosol	No SCL criteria exceedances reported	Likely SCL

The SCL assessment concluded with the identification of nine map units that are likely be SCL. Map units 3, 7, 8, 9, 12, 15, 16 and 17 meet the SCL criteria as they did not exhibit any limitation relating to SCL. SCL map unit 13 exhibited limitations relating to SCL criteria soil pH; however, most of the analysed sites did meet the SCL criteria, therefore SCL map unit 13 is likely SCL.

Six SCL map units (1, 2, 4, 5, 10 and 11) do not meet the SCL criterion for soil chemistry as they exceed the relevant pH threshold limitation exceedance. SCL map unit 14 does not meet the SCL criterion for soil water storage and SCL map unit 6 does not meet the SCL criteria for both for soil water storage and for soil chemistry pH limitation exceedance.

Figure 3 presents the verified SCL soil types across the SCL Assessment Area. The complete SCL Assessment Report is contained in Appendix B.

4.0 Proposed Activity

Bulk electricity demand for the Project will be supplied by the existing Ergon Supply (Dysart 66 kV supply to Saraji Mine), located south of the Project Site. The provision of power of the Project will be supported through the construction of two new powerlines:

- A 66 kV northern extension connecting the Project to the infrastructure and transport corridor
- A co-aligned 66 kV powerline and connection extending off lease and connecting to the Dysart Substation.

The proposed activity associated with this RIDA application relates to the latter of the above powerlines as it traverses SCL.

Works associated with the proposed activity are further detailed in the following sections.

4.1 Permanent Works

No permanent works are associated with the proposed activity.

The proposed activity will ultimately be removed and the land subject to the expected area of impact of the Proposed Activity Footprint will be restored to its pre-activity condition. A restoration plan is provided in support of this application in Appendix C.

4.2 Temporary Works

The proposed activity is temporary in nature and involves the creation of a 35 m wide easement corridor through SCL for the construction and operation of the 66 kV powerline.

Construction works for the proposed activity are anticipated to take approximately 3 months.

The proposed activity is expected to have an operational life of approximately 50 years. On completion, the powerline will be completely removed and the Proposed Activity Footprint will be returned to its pre-activity condition in accordance with the restoration plan (Appendix C).

4.2.1 Design Considerations and Line Route Selection

The primary parameters, such as voltage, capacity, potential connection points, physical and regulatory constraints, have been considered in the design of the proposed powerline.

The line route selection process for the proposed activity comprised four stages that include understanding the purpose of the line, desktop study, site visit, and final route selection. The final route for the powerline has been selected based on the impact consideration of different physical, environmental and regulatory constraints for design and construction. These constraints include:

- Cultural heritage
- Native title
- Vegetation clearing
- Waterway crossing
- Route length
- Flood zones
- Geology and terrain
- Infrastructure crossings (e.g. road, rail, powerlines)
- Land tenure and landowners
- Mine plan, and
- Safety

Additionally, the alignment for the proposed activity is located adjacent to existing infrastructure and associated easements, representing a logical and practical alignment.

4.2.2 Easement Width

The easement width for the proposed activity is 35 m which has been determined by the position of the conductors under high wind conditions (blow-out) for the longest spans and regulatory electrical clearances, including a safety margin.

The 35 m easement width safely accommodates the powerline, including structures, conductors and ground stays. It also provides sufficient space for construction and maintenance activities as well as providing electrical clearance to objects located on the easement boundary.

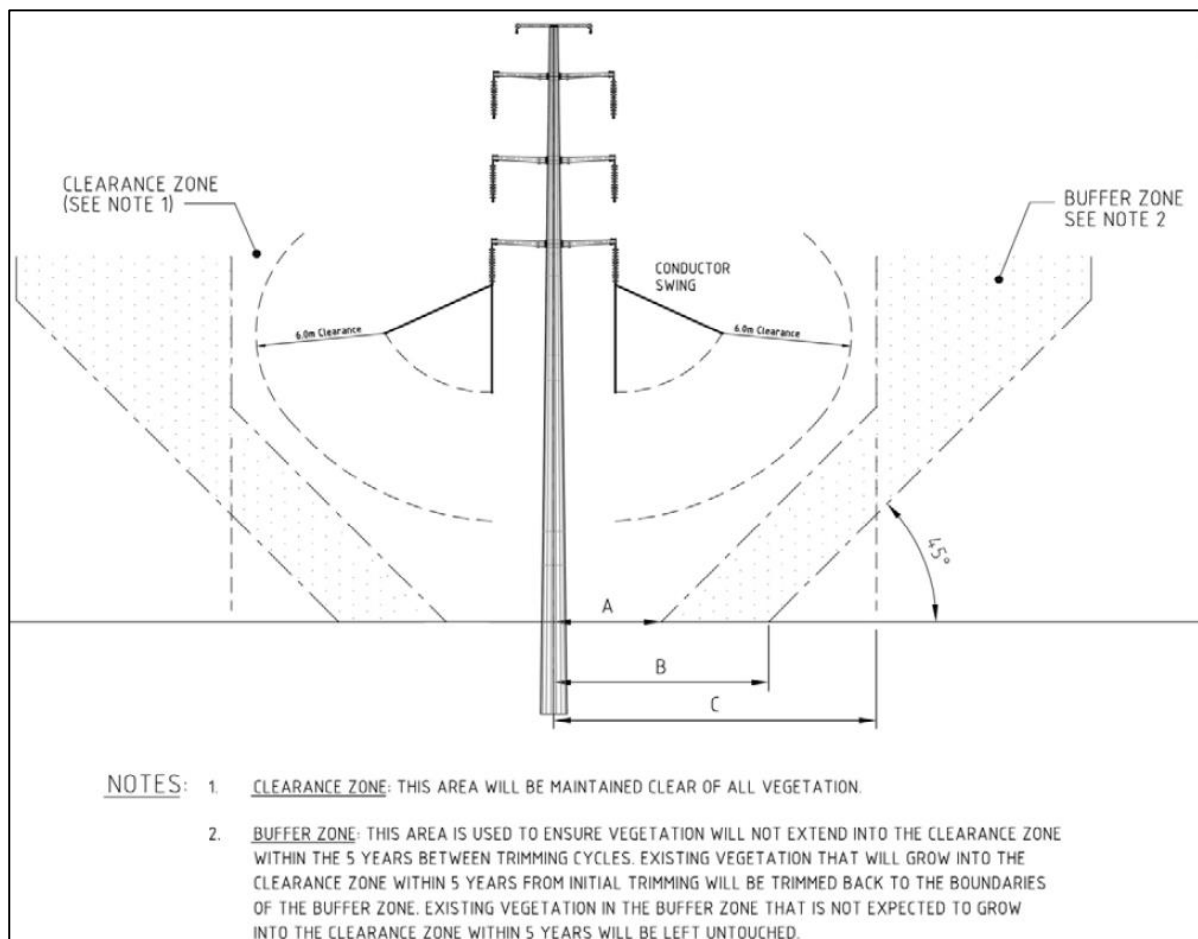
For the purposes of this RIDA application, the easement width is considered to constitute the full Proposed Activity Footprint and maximum potential extent of disturbance. Notwithstanding, actual disturbance associated with construction and installation of physical infrastructure (poles and access tracks) will likely be much less.

4.2.3 Vegetation Clearance

Vegetation clearing will be very minimal as the alignment for the proposed activity is primarily through open pasture.

Clearing requirements are dependent on the powerline voltage. For the proposed 66 kV powerline, a full clearing width of 5m (clearing zone) and an exclusion zone width of 10m (buffer zone) is required. Figure 7 illustrates the clearance and buffer zones for the powerline.

Figure 7 Clearance and buffer zones



4.2.4 Pole Installation

The main construction work for the proposed activity will be the installation of powerline poles to support the overhead powerline. A general construction procedure for the powerline poles includes the following activities:

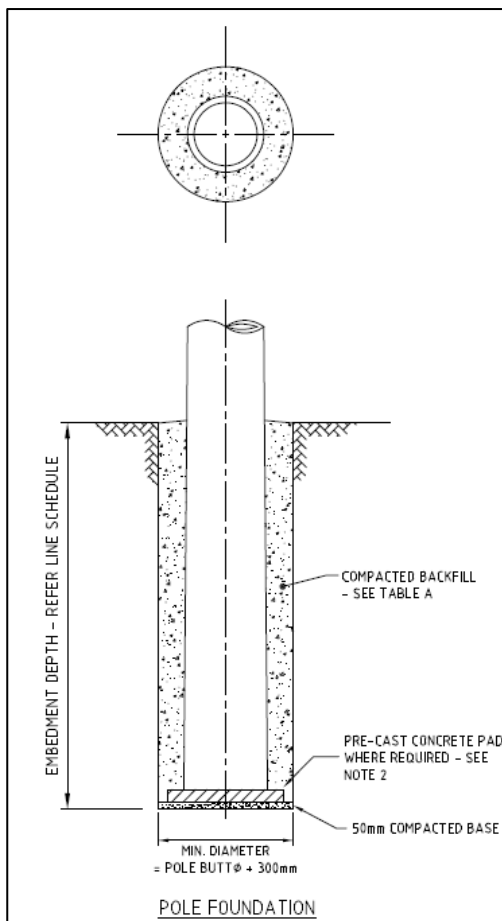
1. Excavate by earth auger drilling (where the soil type allows) at the pole location.
2. Remove loose spoil from the bottom of the hole and power ram bottom surface.
3. Spread and level a 50 mm layer of stabilised backfill as a base for all foundation types.

4. Firmly imbed the pre-cast concrete pad into the base material and level. Minimum pad diameter shall be equal to the pole butt diameter plus 100 mm.
5. Place the pole in position, ensuring it is oriented correctly and vertically plumb in each direction or raked.
6. Place the backfill in layers not exceeding 200 mm and power ram.

The excavation shall not be left open for more than 24 hours, unless backfilled with sand or as otherwise agreed by the site supervisor.

The foundation type and depth/size to be used at each site will be subject to detailed design and based on what is found during excavation of the pole hole. This may be determined through soils tests performed prior to construction, hand-penetrometer tests during construction or previous experience with adjacent sites.

Figure 8 Pole foundation example



4.2.5 Benching

Major benching is not anticipated to be required throughout the larger sections of level or near level graded areas; however, benching may be required at areas with major changes in grade, for example at waterway crossings and where such features cannot be spanned.

4.2.6 Construction and Maintenance Access

An access tracks will be established beside the centre line of poles for heavy machinery access during construction. These tracks will be maintained for the life of the proposed activity to be used for maintenance of the powerline.

4.3 Management and Mitigation

A Construction Environmental Management Plan (CEMP) will be prepared for the Project to provide direction on the management of potential impacts during construction of the Project, which will include the construction of the proposed activity. The CEMP is to be supported by a number of relevant sub-plans, for example, an Erosion and Sediment Control Plan.

4.4 Restoration Activities

A restoration plan (Appendix C) has been developed to demonstrate that the Proposed Activity Footprint within SCL will avoid permanent impacts and be returned to its pre-activity condition, capacity and or productivity following the cessation of the proposed activity.

Based on previous soil and land assessments and the relevant RPI Act statutory guidelines, the restoration plan defines a restoration criteria required to be met in order to return the disturbance area to its pre-activity condition.

The general procedures provided in the restoration plan include the removal of all infrastructure and associated materials followed by amelioration and revegetation of impacted areas. The restoration work process is arranged within the following milestones, which specify the required actions, estimated timeframes and costs:

- Infrastructural removal
- Landform reprofiling and development
- Surface preparation
- Revegetation (pre-disturbance status)
- Revegetation / restoration criteria success, and
- Ongoing monitoring.

The restoration plan provides a criteria for restoration success and recommendations on general management procedure for project site activities, soil surface preparation, revegetation, soil treatments / amelioration and monitoring procedures.

5.0 Legislative Requirements

This section provides an overview of legislation requirements, standards and guidelines, and includes an assessment of the proposed activity against the relevant assessment benchmarks.

5.1 Regulations and Standards for Overhead Lines

The design of the proposed overhead powerline is designed to comply with the latest revision of the following legislations:

- *Queensland Coal Mining Safety and Health Act, 1999*
- *Queensland Coal Mining Safety and Health Regulation, 2001*
- *Queensland Electricity Act 1994*
- *Queensland Electricity Regulation 2006*
- *Queensland Electrical Safety Act 2002*
- *Queensland Electrical Safety Regulation 2002*

The following applicable standards for overhead lines and electrical installations have been considered to determine the physical characteristics of the line (i.e. structure material, structure height and strength, span length, number and type of insulators).

The primary standard is AS/NZS 7000 which specifies the general requirements for the design and construction of new overhead lines to ensure the line is suitable for its intended purpose, and provides acceptable levels of safety for construction, maintenance and operation, and meets requirements for environmental considerations.

- AS/NZS 7000 Overhead Line Design – Detailed Procedures
- AS/NZS 1170 Structural Design Actions – Wind Actions
- AS/NZS 3000 Electrical installations (SAA Wiring rules)
- AS/NZS 4676 Structural design requirements for service utility poles
- AS 1824.2 Insulation Co-ordination - Application Guideline
- AS 4436 Guide for the selection of insulators in respect of polluted conditions
- AS 6947 Crossing of Waterways by electric infrastructure
- NHMRC Interim Guidelines on limits of exposure to 50/60Hz electric and magnetic fields 1989

The primary BMA standards and specifications which specify the general requirements for the surveying, design and construction of new overhead lines, include:

- BMAPR01-0000-CC-SP-0001 Clearing and Grubbing
- BMAPR01-0000-EE-SP-0005 High Voltage Outdoor Disconnectors & Earth Switches
- BMAPR01-0000-EE-SP-0010 Distribution Transformers
- BMAPR01-0000-EE-SP-0021 Electrical Equipment Installation
- BMAPR01-0000-EE-SP-0022 High Voltage Outdoor Surge Arrestors
- BMAPR01-0000-EE-SP-0035 Fibre Optic Cabling and Equipment
- BMAPR01-0000-EE-SP-0048 Design of Overhead Powerlines
- BMAPR01-0000-EE-SP-0049 Survey of Powerline Routes
- BMAPR01-0000-EE-SP-0050 Construction of Overhead Powerlines

All methods, procedures, components and equipment provided shall also comply with BHP Billiton's Fatal Risk Controls and the Electrical Design Criteria.

5.2 Guidelines

The scope of this report was developed in accordance with the following RPI Act guidelines:

- Statutory Guideline 01/14 – How make an assessment application for a regional interests development approval under the Regional Planning Interests Act 2014
- Statutory Guideline 03/14 – Carrying out resource activities in the Strategic Cropping Area
- Statutory Guideline 06/14 – Public notification of assessment applications
- Statutory Guideline 09/14 – How to determine if an activity has a permanent impact on Strategic Cropping Land
- Statutory Guideline 11/16 – Companion Guide.

Other supporting documents such as the SCL Assessment Report and the Restoration Plan have been developed based on additional statutory guidelines under the RPI Act and other relevant guidelines, which are outlined in the respective reports.

5.3 Regional Planning Interests Act 2014

The RPI Act identifies and protects areas of Queensland that are of regional interest. Each area of regional interest is defined under the RPI Act. The Act has identified each RPI based on its contribution, or likely contribution to Queensland's economic, social and environment prosperity. As per Part 1, Division 3, section 7 of the RPI Act, there are four areas of regional interests under the RPI Act and RPI Regulation:

- Living areas in regional communities (Priority Living Areas) (PLA);
- High-quality agricultural areas from dislocation (Priority Agricultural Areas) (PAA);
- Regionally important environmental areas (Strategic Environmental Areas) (SEA), and Highly suitable cropping areas due to the combination of the land's soil, climate and landscape features (SCA).

In accordance with Part 3, Division 2, section 28 of the RPI Act, an application for a RIDA is required where it is intended to carry out a regulated activity or a resource in an area of regional interest if an exemption does not apply.

To restrict the carrying out of activities in areas of regional interest, the RPI Act and RPI Regulation provides an assessment process to consider the activity on its merits (Part 5, section 14 of the RPI Regulation).

The assessment process is a stand-alone and separate process to other assessment processes. It is not linked to the processes under the *Planning Act 2016* (Planning Act), the EP Act or resource tenure applications, and is not bound by recommendations made by the Coordinator-General under the *State Development and Public Works Organisation Act 1971* (SDPWO Act).

Only one regional interest, that is SCA, is relevant to the Proposed Activity Footprint. An assessment against the SCA criteria has been undertaken in section 5.4 of this report.

5.3.1 Aspect of Proposed Activity

The proposed activity is defined as a resource activity under section 12(2) of the RPI Act.

A resource activity is—

- (a) *an activity for which a resource authority is required to lawfully carry out; or*
- (b) *for a provision about a resource authority or proposed resource authority—an authorised activity for the authority or proposed authority (if granted) under the relevant resource Act.*

A resource authority, as per section 13(c)(i) of the RPI Act, includes a mining tenement other than a prospecting tenement under the *Mineral Resources Act 1989* (MR Act).

The proposed activity is therefore defined as a resource activity as it is part of the Project which requires two new MLs to allow for its development. BMA currently holds two MLAs (MLA 70383 and MLA 70459), one of which is over the Proposed Activity Footprint (MLA 70383).

5.3.2 Assessor and Assessing Agency

In accordance with section 26 of the RPI Act, the assessor for this assessment application is the chief executive of the Department of State Development, Infrastructure, Local Government and Planning. Further, as per Schedule 1 of the RPI Regulation, the natural resource department (the Department of Resources) is the assessing agency.

5.3.3 Public Notification

As per Part 5, section 13 of the RPI Regulation, an assessment application is notifiable if the area of regional interest in which a resource activity is proposed to be carried out is a PLA.

Although it is not a standard statutory requirement to notify applications in the SCA, the chief executive, under section 34(4) of the RPI Act, has the discretion to require notification via a requirement notice. Pre-lodgement discussions with the former DSDMIP confirmed that most applications are required to undertake public notification where a previous notification or consultation activity has not occurred.

It is considered that notification should not be required for this assessment application on the following basis:

- BMA is the landowner of the property in which the Proposed Activity Footprint is located on
- The proposed activity is not anticipated to result in a permanent impact and will ultimately be restored to its pre-activity condition
- The proposed activity as part of the Project will undergo extensive public notification during the EIS public notification period, which will be available on BMA's website for a minimum of 30 business days for all stakeholders, interested organisations and the public to review the documents and provide a submission, and
- Public notification has been undertaken for the Project's draft ToR under section 42 of the EP Act.

5.4 Strategic Cropping Land Assessment Criteria

Schedule 2, Part 4 of the RPI Regulation sets out the required outcome and prescribed solutions for activities carried out in SCL within SCA. No other regional planning interest triggers are found subject to the Activity Footprint or the project area.

Table 6 provides an assessment against each prescribed solution set as a criteria for assessment or decision for SCA.

The *Statutory Guideline 03/14 – Carrying out resource activities in the Strategic Cropping Area* states that only the applicable required outcomes and prescribed solution are required to be addressed by the applicant in an application. Based on the criteria provided in the Guideline, the application is subject to Required Outcome 2 only.

Table 6 Response to SCA assessment criteria

Required outcomes	Prescribed solution	Criteria response
<p>Required outcome 1—no impact on strategic cropping land</p> <p>The activity will not result in any impact on strategic cropping land in the strategic cropping area.</p>	<p>Prescribed solution for required outcome 1</p> <p>The application demonstrates the activity will not be carried out on strategic cropping land that meets the criteria stated in schedule 3, part 2.</p>	<p>Proposed Activity Footprint</p> <p>The proposed activity (refer section 4.0) will be carried out within the Proposed Activity Footprint (refer section 2.2.2) and result in impacts on SCL in the SCA.</p> <p>The SCL Assessment Report (Appendix B) provides an assessment of site-specific soil conditions against the SCL criteria listed in Schedule 3, Part 2 of the RPI Regulation to confirm the actual extent of SCL within the Proposed Activity Footprint and the SCL Assessment Area (refer section 2.2.3). On this basis, the prescribed solution for required outcome 1 has been achieved in part for the extent of land within the Proposed Activity Footprint that is confirmed by the SCL Assessment Report to not represent SCL.</p> <p>SCL trigger map amendment</p> <p>As this is a conjoint application for a RIDA and an amendment to the SCL trigger map for areas within and surrounding the Proposed Activity Footprint, an assessment of site-specific soil conditions against the SCL criteria listed in Schedule 3, Part 2 of the RPI Regulation has been undertaken for the SCL Assessment Area (refer section 3.0 and Appendix B).</p> <p>Areas proposed for the SCL mapping change do not involve any activities outside the Proposed Activity Footprint.</p> <p>Though the SCL Assessment Area covers a section of Lot 5 on SP190749, this application does not propose to amend SCL mapping within this property.</p> <p>Information on the location of the land where the amendment is proposed is detailed in sections 2.4 and 2.3 of the application report.</p>
<p>Required outcome 2—managing impacts on strategic cropping land on property (SCL) in the strategic cropping area</p> <p>1. This section applies if the activity—</p>	<p>Prescribed solution for required outcome 2</p> <p>The application demonstrates all of the following—</p> <p>a. if the applicant is not the owner of the land and has not entered into a voluntary agreement with</p>	<p>BMA, who is the proponent, is the owner of the property (Lot 101 on SP310393) that is subject to the Proposed Activity Footprint and the area of impact.</p> <p>This application for the proposed activity and SCL mapping change only relates to Lot 101 on SP310393. Though the SCL Assessment Area covers a section of Lot 5 on SP190749, this application does not propose to amend SCL mapping within this property.</p>

Required outcomes	Prescribed solution	Criteria response
<p>a. does not meet required outcome 1; and</p> <p>b. is being carried out on a property (SCL) in the strategic cropping area.</p> <p>The activity will not result in a material impact on strategic cropping land on the property (SCL).</p>	the owner—the applicant has taken all reasonable steps to consult and negotiate with the owner of the land about the expected impact of carrying out the activity on strategic cropping land;	
	b. the activity can not be carried out on land that is not strategic cropping land, including, for example, land elsewhere on the property (SCL), on adjacent land or at another nearby location;	<p>The alignment for the proposed activity represents a logical location that is a direct route which is aligned and directly adjacent to existing infrastructure and associated easements. Additionally, bordering existing easements avoids further fragmentation of SCL (refer figures 2, 4 and 6)</p> <p>Any alternative alignment is considered unreasonable as disturbance to SCL is inevitable based on the locations of the mine and the Dysart substation. Other alignment routes are therefore not feasible, particularly with regards to the powerline route and implications to cost and time.</p>
	c. the construction and operation footprint of the activity on strategic cropping land on the property (SCL) is minimised to the greatest extent possible;	<p>The Proposed Activity Footprint is minimised to a 35 m width, which ensures the proposed activity can be safely constructed and operated, as detailed in section 4.2.1.</p> <p>The proposed corridor width of 35 m will be wide enough to accommodate the line, including structures, conductors and ground stays, provide sufficient space for construction and maintenance activities as well as provide electrical clearance to any objects or structures located on the corridor boundary (refer section 4.2.2).</p> <p>The minimum width of the corridor is determined by the position of the conductors under high wind conditions (blow-out) for the longest span and regulatory electrical clearances, including safety margin. Therefore, a 66 kV Single circuit powerline with a span of 350 m requires a minimum of 35 m wide corridor or easement.</p> <p>Furthermore, the proposed activity is not anticipated to impose permanent impacts. The proposed activity will ultimately be removed and the land subject to the expected area of impact will be restored to its pre-activity condition (refer section 4.4). A restoration plan is provided in support of this application (refer Appendix C).</p>
	d. if the activity will have a permanent impact on strategic cropping land on a property	The proposed activity is temporary in nature and is not anticipated to have a permanent impact.

Required outcomes	Prescribed solution	Criteria response
	(SCL)—no more than 2% of the strategic cropping land on the property (SCL) will be impacted.	<p>The proposed activity will ultimately be removed and the land subject to the area of impact of the Proposed Activity Footprint will be restored to its pre-activity condition. A restoration plan is provided in support of this application in Appendix C, which has been developed in accordance with the relevant statutory guidelines to meet assessment requirements and restore the effected land to its pre-activity condition.</p> <p>The total area of SCL on property (SCL) is approximately 3,306 ha. The Proposed Activity Footprint covers approximately 21 ha (being 0.63% of the SCL on property) however the SCL Assessment Report (Appendix B) confirms that only 13.6 ha is verified SCL (being 0.41% of the SCL on property), which is less than 2%. Figure 3 demonstrates the spatial extent of verified SCL and non-SCL areas within the SCL Assessment Area.</p>
Required outcome 3—managing impacts on strategic cropping land for a region	N/A	N/A

6.0 Conclusion

AECOM has been engaged by BMA to seek a RIDA for the proposed activity and an amendment to the SCL trigger map for additional land.

The proposed activity is required to support the provision of power of the Project that will be supplied by the existing Ergon Supply (Dysart 66 kV supply to Saraji Mine), located south of the Project Site.

The Project is located near Dysart within the IRC LGA, with the Proposed Activity Footprint located on Lot 101 on SP310393. The extent of verified SCL within the SCL Assessment Area that is associated with this application is also located on 101 on SP310393.

This report and supporting technical documents provide an assessment against the relevant assessment benchmarks, including Schedule 2, Part 4 of the Regional Planning Interests Regulation 2014 (RPI Regulation) for the proposed activity, and Schedule 3, Part 2 of RPI Regulation to verify actual and non SCL areas.

Key findings from the assessment include:

- The proposed activity does not include any permanent works and is temporary in nature as it will ultimately be removed and the land subject to the expected area of impact will be restored to its pre-activity condition
- The Proposed Activity Footprint width has been minimised to the greatest extent possible and will impact approximately 13.6 ha of verified SCL, representing 0.41% of SCL on property (SCL)
- The alignment for the proposed activity represents the logical location that is a direct route which is aligned and directly adjacent to existing infrastructure easements, and
- 637 ha of the SCL assessment area (1965 ha) within the SCL trigger map does not meet the SCL criteria.

This report has demonstrated the proposed activity and the verification of actual SCL areas in the surrounding areas consistent with the relevant assessment benchmarks within the RPI Regulation. On this basis, approval is recommended subject to reasonable and relevant conditions in conjunction with an update to the SCL trigger mapping.