

PART C – SHIRE OF THREE SPRINGS

1. Declarations of Due Consideration

2. Disclosure of Interests

3. Form 1 DAP Applications

- 3.1 3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Road, Womarden – Proposed renewable energy facility (Solar farm & battery energy storage system) – DAP/26/03088

4. Form 2 DAP Applications

Nil

5. Section 31 SAT Reconsiderations

Nil

PART C – Item 3.1 – 3024 (LOT 201) PERENJORI-THREE SPRINGS ROAD & 17112 (LOT 25) MIDLANDS ROAD, WOMARDEN – PROPOSED RENEWABLE ENERGY FACILITY (SOLAR FARM & BATTERY ENERGY STORAGE SYSTEM)

Form 1 – Responsible Authority Report
(Regulation 12)

DAP Name:	Regional
Local Government Area:	Shire of Three Springs
Applicant:	TBB Planning for Progressive Green Solutions
Owner:	Byancanna Pty Ltd & Wamarden Pty Ltd
Value of Development:	\$1 billion
Responsible Authority:	Shire of Three Springs
Authorising Officer:	Simon Lancaster
LG Reference:	A886 & A887
DAP File No:	DAP/26/03088
Application Received Date:	9 April 2026
Report Due Date:	26 June 2026
Application Statutory Process Timeframe:	90 Days
Attachment(s):	1. Application 2. Received Submissions 3. Schedule of Submissions

Responsible Authority Recommendation

That the Regional DAP resolve to:

1. **Approve** DAP Application reference DAP/26/03088 and accompanying plans (as contained in Attachment 1 - Application Report dated 17/3/26) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015* and the provisions of the Shire of Three Springs Local Planning Scheme No.2 subject to the following:

Conditions

1. This decision constitutes planning approval only and is valid for a period of 5 years from the date of approval. If the subject development is not substantially commenced within the 5 year period, the approval shall lapse and be of no further effect.
2. The development shall be undertaken in accordance with the stamped approved plans and supporting documents (Noise Assessment prepared by Herring Storer dated 3/3/26, Traffic Impact Assessment prepared by Transcore dated 16/3/26, Bushfire Management Plan prepared by Western Environmental dated 16/4/26) including any amendments and additional plans and information arising from the approval conditions.
3. Prior to the commencement of development, a Landscape Plan shall be submitted to the local government for approval.

4. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Landscape Plan to the satisfaction of the local government.
5. Prior to the commencement of the development a Construction Management Plan shall be submitted to the local government for approval and approved prior to commencement of works.
6. The development shall be completed in accordance with the approved Construction Management Plan to the satisfaction of the local government.
7. Prior to commencement of the development a Stormwater Management Plan shall be submitted to the local government for approval on advice of the Department of Water & Environmental Regulation.
8. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Stormwater Management Plan to the satisfaction of the local government.
9. Prior to commencement of the development an updated Bushfire Management Plan, and a Risk Management Plan and Emergency Management Plan shall be submitted to the local government for approval on advice of the Department of Fire and Emergency Services.
10. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Bushfire Management Plan, Risk Management Plan and Emergency Management Plan to the satisfaction of the local government.
11. The design, location, installation and maintenance of on-site wastewater/effluent systems is to be to the approval of the local government and in accordance with relevant legislative requirements.
12. The upgrading of Geebulla Road between the Perenjori-Three Springs Road and the development's vehicle access into Lot 201 to the satisfaction of the local government.
13. Prior to commencement of the development an updated Traffic Management Plan shall be submitted to the local government for approval on advice of Main Roads WA.
14. Throughout the construction phase of the development the landowner/applicant shall implement the recommendations of the approved Traffic Management Plan to the satisfaction of the local government.
15. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Traffic Management Plan relating to the operational phase of the development to the satisfaction of the local government.
16. Prior to the commencement of the use all vehicle access point(s) onto the local road network, car parking areas and internal vehicle accessways shall be constructed to the satisfaction of the local government.
17. The installation of any directional/traffic/warning/safety signage in the vicinity of the development's access point onto the road network, and relating to the development, shall be to the satisfaction of the local government.
18. All parking of vehicles associated with the development shall be provided for within the property boundary and not the road reserve.
19. The applicant shall be responsible for the upgrade, repair, reinstatement or replacement of any road infrastructure that is damaged, becomes unsafe or fails to meet appropriate engineering standards where the damage to the road network is caused by reason of use of the road in connection with the approved development, to the satisfaction of the local government (or where agreed to by the local government the applicant may instead arrange payment to the local

- government for such repair, reinstatement or replacement works to be undertaken).
20. Prior to the commencement of operations, an Operational Management Plan shall be submitted to the local government for approval, which includes the establishment of a complaints register to record any complaints that may be received and process for undertaking any mitigating actions that may be required.
 21. The measures included in the approved Operational Management Plan shall be implemented to the satisfaction of the local government.
 22. Prior to the commencement of works associated with the approved development or the issue of a Building Permit (whichever occurs first), the Noise Assessment shall be reviewed and submitted to, and approved by the Shire of Three Springs, on advice of the Department of Water and Environmental Regulation.
 23. Prior to commencement of operations a Preliminary Decommissioning Plan shall be submitted to the local government for approval.
 24. The applicant is required to give at least 12 months' notice to the local government if the proposed development is to cease operations and all infrastructure must be decommissioned and removed from the site. The site must be demonstrated to be free of contaminants and the site rehabilitated through deep ripping/earthworks, and other measures as included in the approved Final Decommissioning Plan to the satisfaction of the local government, within 2 years of giving this notice, unless the local government agrees otherwise.
 25. Prior to commencement of the use, arrangements shall be made for the provision of an easement pursuant to Section 167 of the *Planning and Development Act 2005* for existing or planned Western Power distribution and transmission infrastructure being granted free of cost to Western Power.

Advice Notes

- (a) This is a Development Approval only. The Proponent is advised that it is their responsibility to ensure the proposed development complies with all other applicable legislation, local laws and/or licence/permit requirements that may relate to the development. This includes (but is not limited to) the *Environmental Protection (Noise) Regulations 1997*, *Environmental Protection Act 1986*, *Rights in Water and Irrigation Act 1914*, *Aboriginal Heritage Act 1972* and *Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007* amongst others.
- (b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences.
- (c) The applicant is advised that the proposed works are near an area of high risk. It is recommended that persons planning to build or undertake works in high risk areas near transmission or communication assets act in a safe manner at all times and in accordance with all applicable legal and safety requirements (including the 'duty of care' under the laws of negligence, Worksafe requirements and guidelines, Australian Standards and Western Power policies and procedures).

- (d) The applicant is reminded of their obligations under the *Aboriginal Heritage Act 1972* and it is recommended that they engage with the Yamatji Southern Regional Corporation to discuss their project and undertake a heritage survey and adopt an 'avoidance' approach to the development.
- (e) Prior to any ground disturbance of the site, all contractors and operators should be made aware of the obligations under the *Aboriginal Heritage Act 1972* relating to site discovery and reporting protocols. This includes stopping work and seeking the advice of both the Registrar of Aboriginal Sites and Yamatji South Regional Corporation in the event that materials of Aboriginal heritage value are discovered during construction activities.
- (f) The applicant will need to consult with the Main Roads WA Heavy Vehicle Services branch to ascertain any approval requirements that may be required for their proposed heavy vehicle combinations, transport routes and operations.
- (g) In relation to conditions 3 & 4 the Landscape Plan shall provide mitigation measures along the Perenjori-Three Springs Road with regard for the BESS component of the development.
- (h) In relation to conditions 5 & 6 the Construction Management Plan shall address the following associated with the construction of the development or any other matters considered relevant by the local government.
 - i) hours of construction;
 - ii) heritage management protocols to mitigate potential risks linked to the exposure of Aboriginal artefacts during ground-disturbing activities;
 - iii) temporary fencing, hoardings, gantries, and signage;
 - iv) site access and egress;
 - v) parking arrangements for staff and contractors;
 - vi) deliveries and storage of construction materials and machinery;
 - vii) management of vibration, dust, wind, and erosion;
 - viii) management of any stormwater discharge;
 - ix) management of construction noise and other site generated noise;
 - x) demolition and construction waste management, recycling, and removal;
 - xi) protection of any public realm infrastructure;
 - xii) public communication and complaint handling procedures;
 - xiii) biosecurity protocols.
- (i) In relation to conditions 13 & 14 the Traffic Management Plan shall address the following associated with the construction of the development or any other matters considered relevant by the local government.
 - i) construction vehicle route(s) and traffic management;
 - ii) size and frequency of construction vehicles;
 - iii) road upgrades/repairs and timing of works associated with the construction of the development.
- (j) The Shire is unable to provide guarantee of all-weather access on its unsealed road network, and in the event that the applicant requires all-weather access to its site, the applicant is required to seal the road network to the local government's satisfaction to connect into the existing sealed road network.
- (k) In relation to conditions 9 & 10 the Bushfire Management Plan shall address the issues raised by the Department of Fire & Emergency Services and any other matters considered relevant by the local government.
- (l) In relation to condition 11 the applicant is advised that approval from the Department of Health is required for any on-site wastewater/effluent treatment processes.
- (m) The applicant is responsible to ensure that biosecurity protocols are maintained for the site to minimise biosecurity risks for the landowner, adjoining farms and along the transport route and should further information be required on

- appropriate practices the applicant should contact the Department of Primary Industries & Regional Development in this regard.
- (n) The applicant shall enter into a contribution agreement towards community, social or other infrastructure/programs that will benefit the local community. The agreement should establish the process by which the contributions should be directed to the Shire of Three Springs Medical Community Benefit Scheme or other local groups/ventures deemed appropriate. The agreement should give due regard for best available practice including the Community Benefits Guideline for Large-Scale Renewable Energy Projects in the South West Interconnected System and the contribution value per megawatt (\$/MW) formula benchmark of the New South Wales Benefit Sharing Guideline.
- (o) In relation to condition 22 the reviewed Environmental Noise Assessment shall include:
- (i) Assessed noise levels for all nearby sensitive receivers (including the residence upon Lot 200 (DP420979) Perenjori-Three Springs Road that is 2.6km west of the BESS).
 - (ii) Background noise levels.
 - (iii) Operating noise levels of equipment selected for installation.
 - (iv) Assessment of noise levels for worst-case scenario of night-time at 100% capacity operation.
 - (v) Recommended measures to reduce any noise level exceedances.
- Any recommended measures to reduce noise level exceedances identified in the approved reviewed Noise Assessment shall be implemented to the satisfaction of the Shire of Three Springs, in consultation with the Department of Water and Environmental Regulation, prior to the operation of the approved development.
- (p) Should the applicant be aggrieved by this determination there is a right (pursuant to the *Planning and Development Act 2005*) to have the decision reviewed by the State Administrative Tribunal. Such application must be lodged within 28 days from the date of determination.

Details: outline of development application

Region Scheme	N/A
Region Scheme - Zone/Reserve	N/A
Local Planning Scheme	Shire of Three Springs Local Planning Scheme No.2
Local Planning Scheme - Zone/Reserve	Rural
Structure Plan/Precinct Plan	N/A
Structure Plan/Precinct Plan - Land Use Designation	N/A
Use Class and permissibility:	Renewable Energy Facility (A)
Lot Size:	Lot 201 – 3,072.4966ha Lot 25 – 2,639.5296ha
Existing Land Use:	Agriculture-Extensive
State Heritage Register	No
Local Heritage	☒ N/A ☐ Heritage List ☐ Heritage Area
Design Review	☒ N/A ☐ Local Design Review Panel

	☐ State Design Review Panel ☐ Other
Bushfire Prone Area	Yes
Swan River Trust Area	No

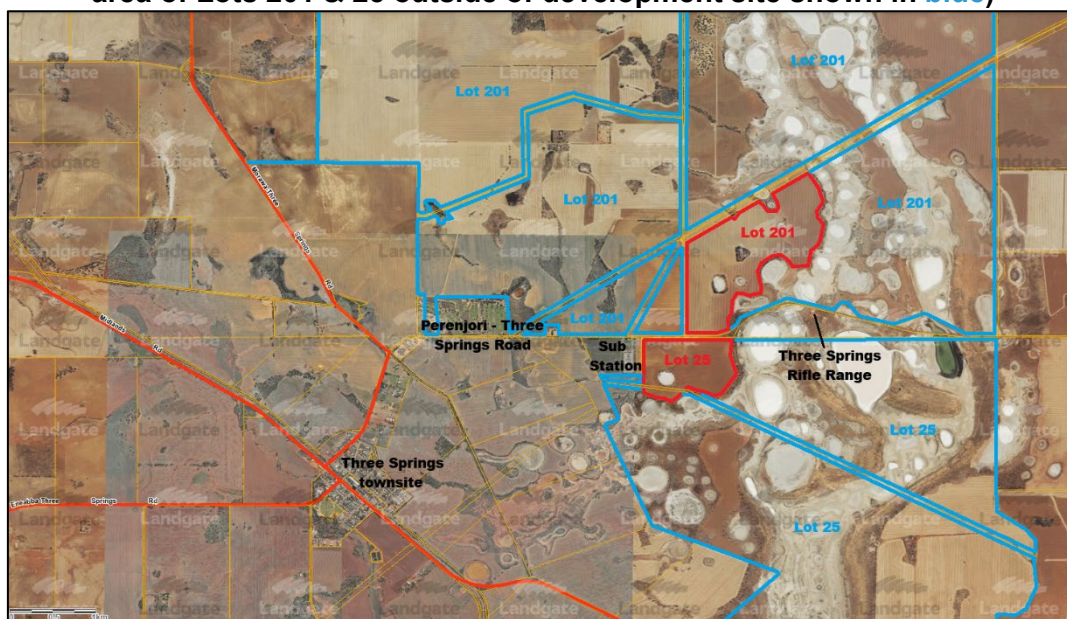
Proposal:

The applicant is seeking development approval for a Renewable Energy Facility comprising a Solar Farm with accompanying Battery Energy Storage System (BESS) upon a 300ha portion of 3024 (Lot 201) Perenjori-Three Springs Road and 17112 (Lot 25) Midlands Road, Womarden.

Background:

The proposed development site is approximately 3km north-east of the Three Springs townsite.

Figure 1 – Location Plan for 3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Road, Womarden (development site shown in red, area of Lots 201 & 25 outside of development site shown in blue)



The development site is flat and has been cleared and used for cropping purposes for several decades with the exception of one small outcrop that contains vegetation and the development application proposes to not disturb this outcrop. There are also salt lakes dotted throughout the development site and the development application does not propose disturbance of these.

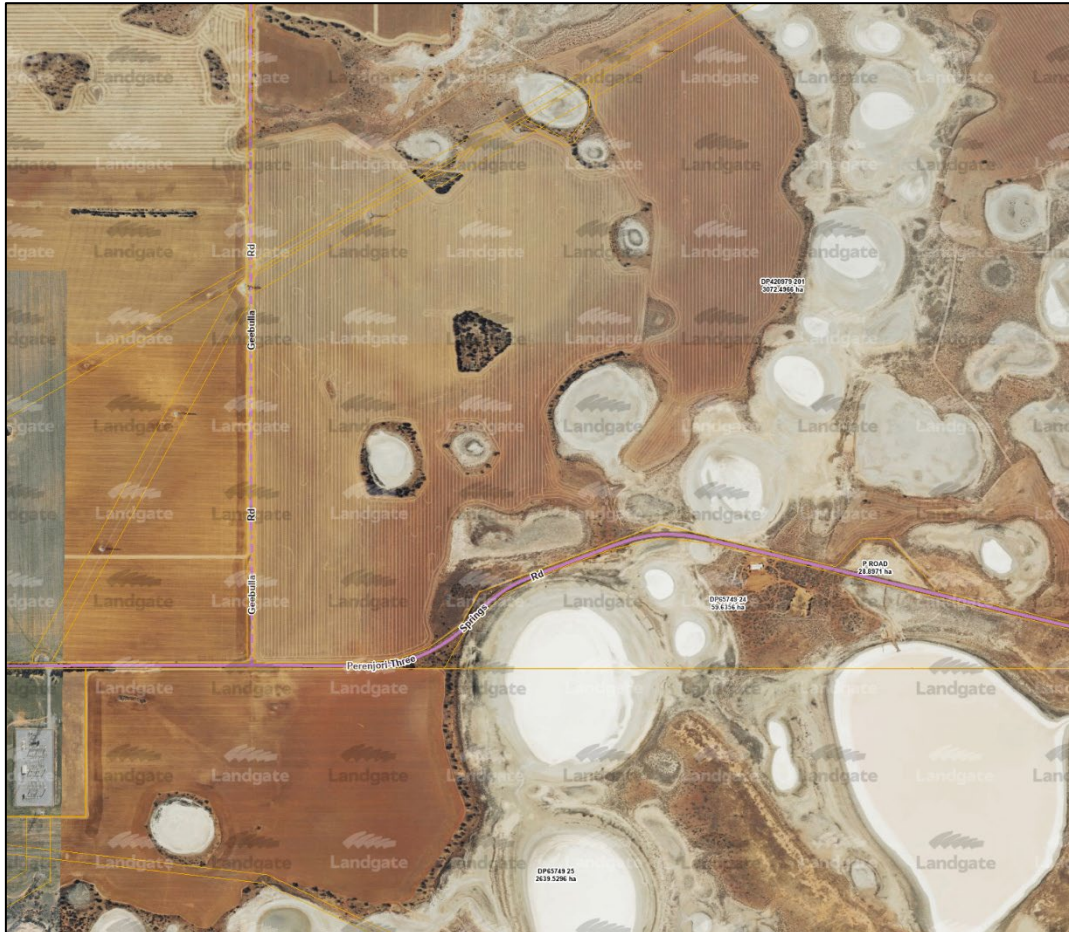
The development site is bordered to the east by the Yarra Yarra Lakes which are a series of interconnected salt lakes. The site is bordered to the north by the 330kV power transmission line running between the Three Springs townsite and the Karara magnetite iron ore mine, and the site also contains a 132kV transmission line.

To the immediate west of the development component that is upon Lot 25, is the Western Power substation and to the north-east is the Three Springs Sporting Clays

and Rifle Range. The development site is otherwise bordered in every direction by the remainder of Lots 201 and Lot 25 which are used for farming.

The sealed Perenjori-Three Springs Road runs between Lots 201 and 25 and the unsealed Geebulla Road runs alongside the western boundary of the development site upon Lot 201.

Figure 2 – Aerial Photo of 3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Road, Womarden



The application proposes to develop the following:

- solar panel array covering approximately 264ha in previously cleared sections of Lot 201 & 25, generating up to 191MW. The solar farm would consist of panels mounted on trackers with 5m separation between rows. The applicant's plans note a particular solar panel that would typically measure 5.59m² although this may vary dependant upon final module/equipment selection. It is noted from previous solar farm applications that solar panels are generally mounted at a clearance height of 1.5m above ground level, meaning this would be the solar panel array height when laid flat and increasing to approximately 2.4m in height when tilted to 60°, although again some variation may be dependant upon final module/equipment selection.
- BESS covering approximately 4.5ha at the western end of the development site, immediately alongside the existing Western Power substation, with a 250MW power capacity and 2GW storage capacity. The BESS compound would consist of 350 battery containers which have an overall height of 2.896m above ground level;

- substation with transformer block;
- switch room and control building;
- operation and maintenance facility;
- 6 meteorological stations;
- incidental access roads, laydown areas, water tanks and security fencing.

Figure 3 – proposed Solar Farm development layout on 3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Road, Womarden

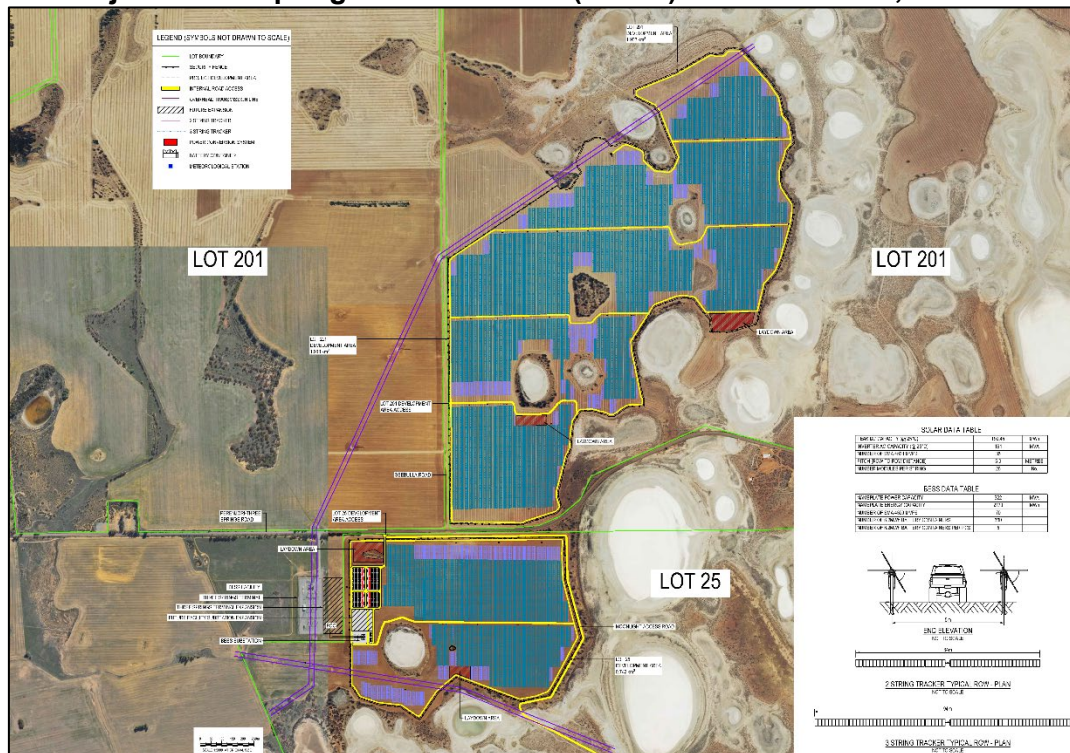
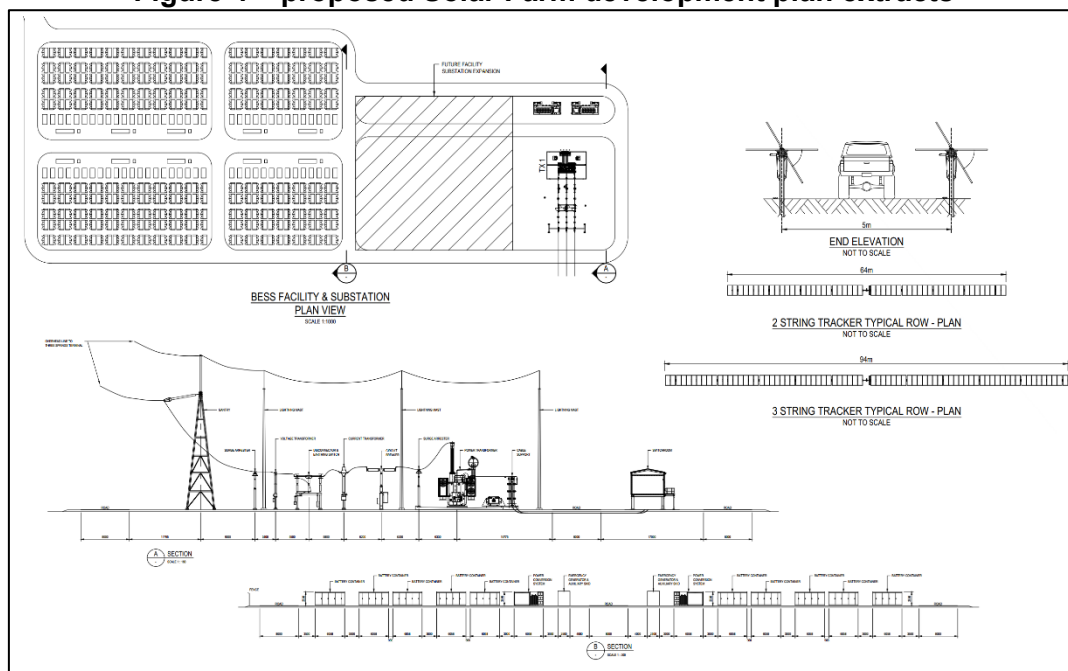


Figure 4 – proposed Solar Farm development plan extracts



The application is provided as **Attachment 1** and includes the following:

- Application Report;
- Development Plans;
- Traffic Impact Statement;
- Noise Assessment Report;
- Visual Landscape Artistic Impressions;
- Bushfire Management Plan

Legislation and Policy:

Legislation

Planning and Development Act 2005

Planning and Development (Development Assessment Panel) Regulations 2011

Planning and Development (Local Planning Schemes) Regulations 2011

Shire of Three Springs Local Planning Scheme No.2

<https://www.wa.gov.au/system/files/2021-10/LPSC-Three-Springs-scheme-text.pdf>

The proposed solar farm development meets with the land use definition of 'Renewable Energy Facility' which is classified in the Shire's Scheme as an 'A' use within the 'Rural' zone which:

"means that the use is not permitted unless the local government has exercised its discretion by granting development approval after giving notice in accordance with clause 64 of the deemed provisions."

'Renewable Energy Facility' is defined under the Scheme as follows:

"means premises used to generate energy from a renewable energy source and includes any building or other structure used in, or in connection with, the generation of energy by a renewable resource. It does not include solar panels or a wind turbine located on a lot with a single house where the energy produced only supplies that house or private rural use or anemometers."

Sections 5.1-5.4 of the application provided as **Attachment 1** addresses the application in relation to the local planning framework.

State Government Policies

WAPC Position Statement: Renewable Energy Facilities

[Position statement renewable energy facilities \(www.wa.gov.au\)](https://www.wa.gov.au/system/files/2021-06/WAPC-Position-Statement-Renewable-Energy-Facilities.pdf)

Draft Renewable Energy Planning Code

<https://www.planning.wa.gov.au/draft-renewable-energy-planning-code>

Community Benefits Guideline for Large-Scale Renewable Energy Projects in the South West Interconnected System

<https://stateofenergy.wa.gov.au/for-community/community-benefits-guideline>

State Planning Policy 2.5 – Land Use Planning in Rural Areas

https://www.wa.gov.au/system/files/2021-06/SPP_2-5_Rural_Planning.pdf

State Planning Policy 3.7 – Planning in Bushfire Prone Areas

<https://www.planning.wa.gov.au/state-planning-policy-3.7-bushfire>

Sections 5.5-5.6 of the application provided as **Attachment 1** addresses the application in relation to the state planning policy framework.

Structure Plans/Activity Centre Plans

Not applicable

Local Policies

Shire of Three Springs Strategic Community Plan 2018-2028

[Three Springs Community Strategic Plan](#)

Outcomes 1.1.1, 1.3.1, 1.3.3, 1.3.4, 1.3.5, 1.3.6, 4.2.4

Consultation:

Public Consultation

The application was advertised in accordance with the requirements of Clause 64 of the Regulations. The advertising period ran from 7 April 2026 until 4 May 2026 with the Shire of Three Springs undertaking the following actions:

- copy of the application being placed on the Shire website;
- notice placed in the Mid West Times on 22 April 2026;
- notice placed in the Yakabout community newspaper on 28 April 2026;
- correspondence inviting comment being sent to all landowners within 2km of the development site;
- correspondence inviting comment being sent to the following government agencies and service authorities:
 - ATCO Gas
 - Australian Gas Infrastructure Group
 - Department of Biosecurity, Conservation & Attractions
 - Department of Energy & Economic Diversification;
 - Department of Fire & Emergency Services
 - Department of Health
 - Department of Mines, Petroleum & Exploration
 - Department of Planning, Lands & Heritage
 - Department of Primary Industries & Regional Development
 - Department of Water & Environment Regulation
 - Horizon Power
 - Main Roads WA
 - Mid West Development Commission
 - Synergy Energy
 - Telstra
 - Water Corporation
 - Western Power
- display of the application at the Shire office.

The Shire received 11 submissions, all of them from government agencies either offering no objection or technical comment, no submissions were received from neighbouring landowners and no objections to the application were received. Copies of the received submissions have been provided as **Attachment 2**.

A Schedule of Submissions that summarises the received submissions, and provides individual comment upon the raised issues, has been provided as **Attachment 3**.

The applicant was also provided with a copy of the received submissions and their responses to the raised issues have also been included within the Schedule of Submissions provided as **Attachment 3**.

Referrals/consultation with Government/Service Agencies

Refer previous section.

Design Review Panel Advice

Not applicable.

Planning Assessment:

Figure 5 – View north across Lot 201 at west end of development site



Figure 6 – View north across Lot 201 at east end of development site



Figure 7 – View south across Lot 25 at west end of development site



Assessment of the development and the received submissions identified the following key issues.

Construction & Traffic

The most significant traffic impact of the development will be during the 12-14 month construction phase proposed to begin in mid-2027 when an estimated 100 workers would generally be onsite, with a peak of 220-330 workers during the most intensive period of activity, with construction being between 6:00am-6:00pm 7 days per week.

The Transport Impact Statement (contained within the application provided as **Attachment 1**) estimates that the construction phase would generate 96 (return) daily vehicle trips, largely comprising light vehicles and workforce buses.

The larger construction-phase vehicles generally associated with materials delivery would comprise 19m semi-trailers, 27.5m B-Doubles and potentially 36.5m B-Triple road trains, typically 2 per day (4 movements). A one-off convoy would be required to transport the transformer to site and the consultant responsible for the Transport Impact Statement has been in discussion with Main Roads WA's Heavy Vehicle Services over potential routes for this oversize, overmass transportation.

The Transport Impact Statement notes:

“Details relating to number and type of vehicles involved will be confirmed later in the project and those road trains and B-doubles may be subject to issuance of permits by Main Roads WA for Restricted Access Vehicle (RAV) movements on the road network. It is recommended that the permit requirement and transportation conditions be investigated in greater detail once all elements of the Project's transport task become known and available.” (page 6)

There would be 2 access points into the development site; 1 on the south side of Perenjori-Three Springs Road approximately 300m east of the access point into the Western Power substation; and 1 on the east side of Geebulla Road approximately 550m north of the Perenjori-Three Springs Road intersection.

Given the scale of Lots 201 & 25 there is ability to ensure that no vehicle parking is conducted outside of the property boundary (i.e. within the road reserve).

The application report notes that:

“A Construction Management Plan will be prepared during detailed design to the satisfaction of the Shire and anticipated via a suitable condition of approval. The Construction Management Plan will outline construction management measures and mitigation to address potential impacts.” (page 14)

“As part of the Construction Management Plan, a Construction Traffic Management Plan (CTMP) will be prepared to the Shire’s satisfaction. The CTMP will generally schedule deliveries outside peak periods, direct heavy vehicles and workforce buses along the nominated route and ensure all workforce parking occurs on-site.” (page 15)

The recommendation of this report includes applying a condition of approval requiring that the applicant submit a Construction Management Plan and Traffic Management Plan for Shire approval and that this plan include traffic management and road upgrade details.

Noise

The Noise Assessment Report is provided as part of **Attachment 1**. The Assessment models that the proposed development would comply with the *Environmental Protection (Noise) Regulations 1997* as measured from surrounding noise sensitive premises.

The Noise Assessment Report identifies 2 residences in the vicinity of the development site:

R1 – 2.9km west of the proposed BESS site (the existing Western Power substation is between the proposed BESS and the receptor);

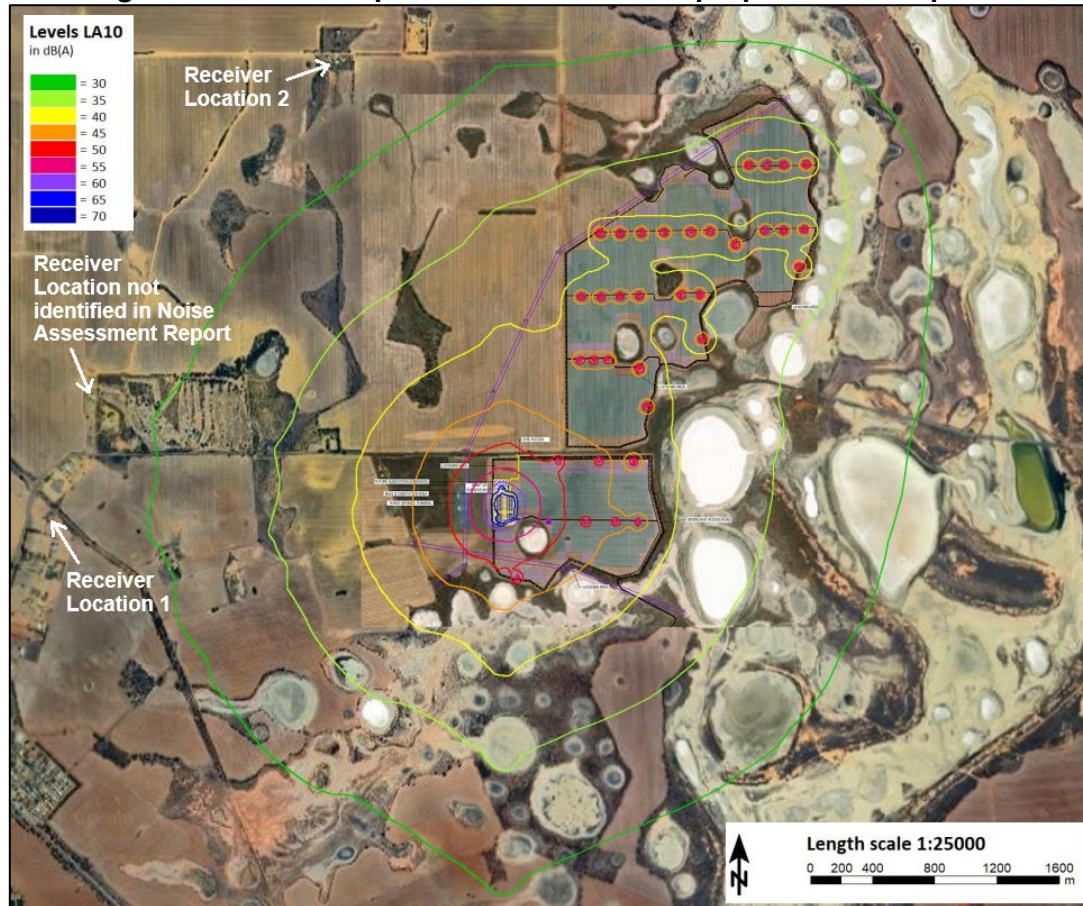
R2 – 2km north-west of the closest solar panels (this residence is upon Lot 201 and is not a third-party residence).

The Noise Assessment Report does not identify the residence upon Lot 200 (DP420979) Perenjori-Three Springs Road that is 2.6km west of the BESS. However, this noise sensitive premises is identified in the noise modelling as being subject to the same compliant noise levels as the other identified receptors.

It is noted that the ‘Rural’ zoning of the surrounding area does reduce the likelihood of further subdivision (and with it potential introduction of additional noise sensitive premises) to encroach towards the development site. It is also noted that the combined 5,712.0262ha area of Lots 201 & 25 which surrounds the development site limits ability for a third-party residence to be developed in proximity to the BESS.

The recommendation of this report includes applying a condition requiring that, prior to the commencement of works, the Noise Assessment shall be reviewed and submitted to, and approved by the Shire of Three Springs, in consultation with the Department of Water and Environmental Regulation.

Figure 8 – Sensitive premises in relation to proposed development



Visual Impact

Artistic Impressions were prepared by the applicant, which are provided within **Attachment 1**.

Figure 9 – Artistic impression from Perenjori-Three Springs Road looking south across Lot 25 (comparable to existing viewpoint in Figure 5)



Figure 10 – Artistic impression from Perenjori-Three Springs Road looking south across Lot 25 (comparable to existing viewpoint in Figure 7)



It is noted that the solar farm would be sited in a flat landscape that is already impacted by the 330kV and 132kV transmission lines and the Western Power substation.

Schedule 2 – Development Requirements of the Scheme does not specify any landscaping requirement specific to this zone or particular type of development. Therefore there is no minimum landscaping requirements applicable to the proposed development. Notwithstanding this, a condition of approval could be imposed requiring a Landscape Plan be submitted for approval by the Shire prior to the commencement of development. Further a second condition of approval could be imposed requiring the applicant to implement the landscaping shown on the approved landscape plan and that the landowner must thereafter maintain the landscaping to the satisfaction of the Shire. It is considered that the landscaping should be largely concerned with the BESS as viewed from Perenjori-Three Springs Road.

Solar panels have the potential to cause glare and reflect light. As a result, the proposed development does have the potential to impact on the amenity and character of the locality. This is an issue that has been raised on other solar farm developments and has generally been addressed by way of conditions of approval which require the solar panels to comply with the relevant Australian Standards to ensure that the off-site visual impacts of the development are minimised.

It is noted that the purpose of the solar panels is to absorb sunlight and convert it into electricity, and therefore minimising the light reflected is a key design goal. Panel design typically includes an absorbent surface material, and not glass, which materially reduces glare.

The application report notes that:

“The potential for glint and glare is inherently low for modern photovoltaic facilities because modules are designed to absorb incident light. In the local context, the solar arrays are positioned in low ground and experienced by road users largely in motion, further reducing the likelihood of specular reflection aligning with a viewer for any meaningful duration.

Design and operational measures will be implemented to ensure any residual risk remains negligible. Modules will be specified with factory-applied anti-reflective

coatings and installed on the single-axis trackers. Current panel specifications prioritise light absorption over reflectance, improving efficiency and minimising potential glint and glare.

The solar array layout aligns with land contours and avoids directing module faces towards known view corridors from Perenjori-Three Springs Road. Above-ground cabling will be minimised and ancillary structures finished in matte, recessive colours to avoid incidental glare.

Given the site's low-lying and flat topography, the isolated rural setting, and the measures above, the risk of adverse glint or glare to road users or distant receptors is very low and does not constitute a constraint to approval." (pages 16-17)

Given the proposed BESS aspect of the development would operate 24 hours a day 7 days a week, it is anticipated there would be a requirement for outdoor lighting at the subject site which has the potential to have off-site visual impacts.

Previous DAP approvals of solar farms have been made subject to condition that the applicant prepare a Light Reflection and Emissions Management Plan that demonstrates how the proposed solar panels and lighting would not cause adverse off-site visual impacts to the surrounding properties and locality to the satisfaction of the local government.

However, it is also noted that the BESS development would be sited behind the existing Western Power substation as viewed from the Three Springs townsite.

Bushfire

The majority of the development site is outside of the bushfire prone area as identified upon the Department of Fire & Emergency Services State Map:
<https://maps.slip.wa.gov.au/landgate/bushfireprone/>

The DFES State Map does identify the perimeter of the proposed development site along its northern and western boundary with the salt lakes and an internal section around a salt lake as being bushfire prone where the 50m mapped buffer area around native vegetation overlaps the development area.

The aspects of the development that are within a bushfire prone area are solar panels and not habitable buildings and on this basis there is no formal requirement to assess the solar farm proposal against State Planning Policy 3.7 – Planning in Bushfire Prone Areas and the Planning for Bushfire Guidelines.

However, some battery components of the BESS might be considered hazardous and warrant consideration, although it is noted that the BESS component of the development is sited outside the DFES identified bushfire prone area.

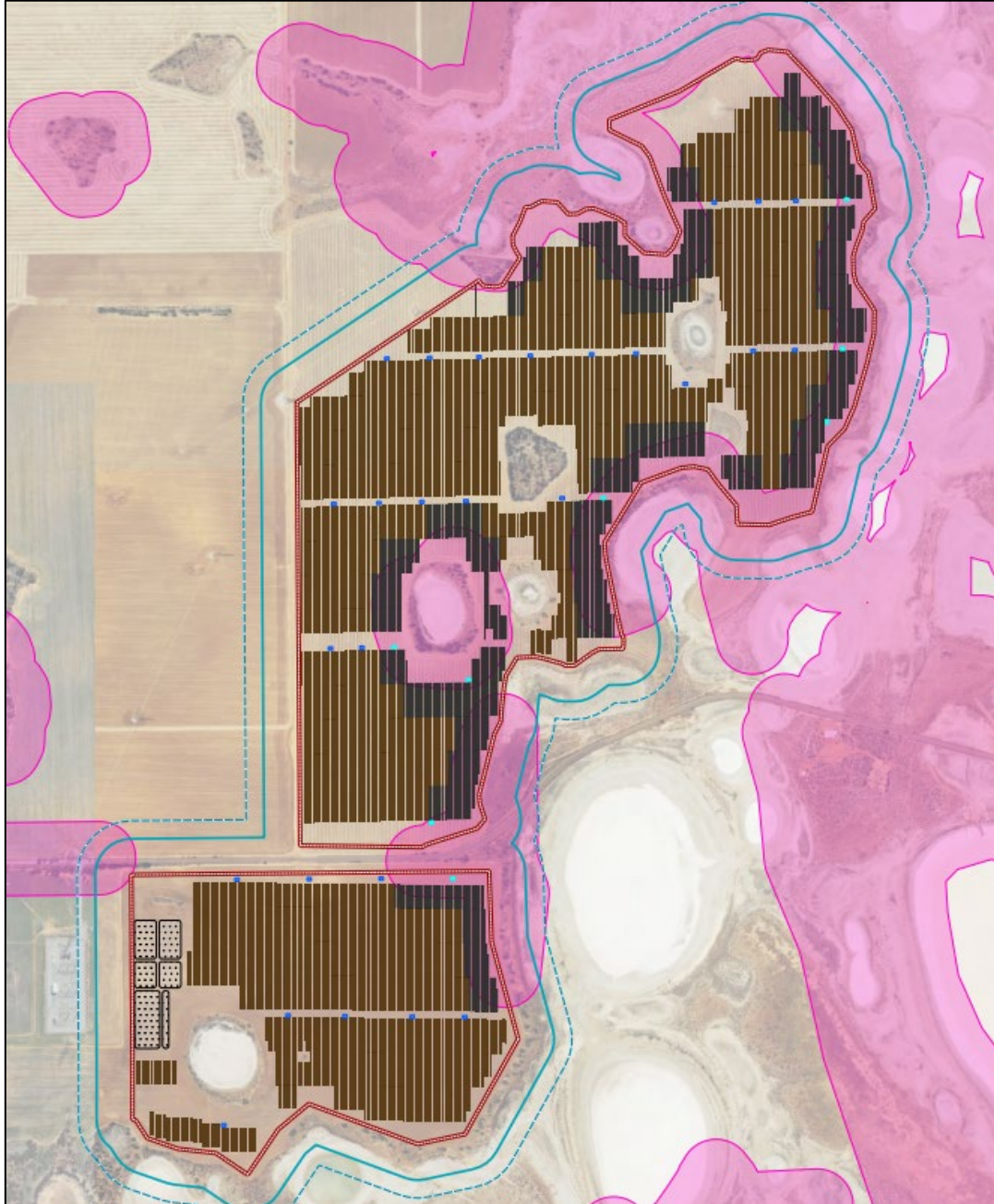
The applicant has prepared a Bushfire Management Plan which is in the application provided as **Attachment 1**.

Sections 4 & 5 of the Bushfire Management Plan provides recommendations in regards to development design and ongoing maintenance to manage bushfire risk, including relating to asset protection and separation distances both internal and external, access points and network, firefighting infrastructure and monitoring equipment.

The recommendation of this report is that conditions, and advice notes, be applied to any approval of the development requiring the applicant to update (and subsequently

implement) the Bushfire Management Plan with regard to the technical comment provided by the Department of Fire & Emergency Services during the consultation period (see Schedule of Submissions provided as **Attachment 3** for further detail). The report also recommends that a Risk Management Plan and Emergency Management Plan be prepared.

Figure 11 – Bush Fire Prone Areas overlaid onto proposed development layout



Environmental

The development has been planned so that it is upon previously cleared and farmed land and would not require the clearing of remnant vegetation. The development is located away from watercourse and tributary lines.

The development will create considerable impervious surface area and the recommendation of this report is that the applicant should prepare, and implement the recommendations of, a Stormwater Management Plan that is prepared with regard for the guidelines and advice of the Department of Water & Environment Regulation.

Heritage

Lots 201 & 25 are identified on the Department of Planning, Lands and Heritage Aboriginal Heritage Inquiry System as having registered/historic/lodged places.

The applicant is required to meet with their obligations under the *Aboriginal Heritage Act 1972*.

The recommendation of this report includes advice notes reminding the applicant of these obligations relating to site discovery, stopping work and reporting protocols in the event that materials of Aboriginal heritage value are discovered during construction activities.

Advice note is also recommended that the applicant should engage with the Yamatji Southern Regional Corporation to discuss their project and undertake a prior heritage survey and adopt an 'avoidance' approach to the development should items be uncovered during the survey.

The recommendation of this report also includes applying a condition of approval requiring that the applicant submit a Construction Management Plan. The advice notes require that the Construction Management Plan shall address heritage management protocols to mitigate potential risks linked to the exposure of Aboriginal artefacts during ground-disturbing activities.

Lot 201 & 25 do not contain sites identified upon the Heritage Council's State Heritage Register, or the Shire's Local Heritage Survey/Municipal Inventory of Heritage Places.

Decommissioning

The application does not provide information relating to the expected operational lifespan of the solar farm.

However, it is recognised the solar farms can continue beyond the anticipated standard lifespan of the panels with incremental reductions in original component capacity, or the solar farm could undergo a gradual replacement program with new solar panels.

It is also recognised that given the proposed solar farm's key strategic positioning immediately alongside the Western Power substation and transmission line that it is likely to remain relevant for some time.

To address the issue of the solar farm's operational life it is recommended that a condition of approval address the development's eventual decommissioning phase when it is expected it would be returned to its prior state and availability for farming.

At such time as the solar farm is to be decommissioned then it should be the responsibility of the applicant/landowner to remove all structures from the subject site and rehabilitate the site so it can be used for rural purposes again. This will ensure that the development does not remain at the subject site after ceasing operations which

would be a detriment to the amenity and character of the locality and a reduced primary production economic return for the local economy. A recommended condition of approval has therefore been included to address decommissioning and site rehabilitation.

Conclusion:

It is considered that the application for a Solar Farm and BESS can be supported based on the following:

- the development will provide local economic benefit through the creation of employment opportunities at both the construction and operational phases and represents a significant investment in the region and further diversification of the economic base;
- the development will increase the level of power produced through renewable energy sources and see further development of the Midwest as the state's renewable energy hub following approval and development of several other large wind and solar farms in recent years;
- whilst the facility will have some visual impact on Perenjori-Three Springs Road this is an area that is already visually impacted by existing power transmission lines and substations, and there is ability to reduce the visual impact of the BESS to some degree through imposition of a landscaping/screening condition;
- the development site makes use of its strategic location alongside the substation and power transmission lines, whereas if it had been developed away from the transmission line it would have had a greater visual impact through the requirements for a spur transmission line;
- post-construction phase the traffic impact of the facility would be minimal with 5 permanent employees;
- the closest residences are over 2km from the edge of the site and there is limited ability for further encroachment of residences towards the facility due to the large surrounding lot sizes and general disinclination of the Western Australian Planning Commission to support subdivision of rural land, and the majority of the land within 2km is contained in the parent Lots 201 & 25;
- there is ability through prior engagement with the Yamatji Southern Regional Corporation Aboriginal and conducting of a cultural heritage survey, and further to implement heritage management protocols during the construction phase to ensure Aboriginal cultural heritage sites are undisturbed;
- the development site does not contain any European heritage sites identified by the Heritage Council of WA or local government;
- the identified site does not require clearing of remnant vegetation;
- the identified site is not in proximity to watercourses;
- the consultation period with surrounding landowners indicated a level of indifference/acceptance for this development;
- the consultation period with state government agencies identified no significant issues that would give reason to refuse the development, all received submissions provided technical comment and identified aspects where conditions of approval could be implemented to address the received comments;
- the application is similar to 3 other solar farm/BESS applications that have been approved by DAP in the Shire of Three Springs;
- the flat nature of the site removes the need for extensive earthworks as part of the development;
- there is ability for the development site to be returned to its previous farming use at such time as the solar farm is no longer viable/required;

- there is ability for the development site to retain some farming use during its operation through grazing which also will control fuel load and assist in fire management;
- whilst the development site is 300ha in area this represents only 5.25% of the overall 5,712.0262ha landholding of Lots 201 & 25, which can remain used for farming purposes;
- the development site is on the portion of the landholding compromised by salt lakes and the use of the land for renewable energy and grazing can be considered an appropriate use for land of a lower agricultural capability than elsewhere upon the farm;
- there should be a level of consistency and fairness applied, considering that were an identical project upon this site have been proposed by Western Power (rather than by a private proponent) it would have been exempted from the planning process pursuant to Schedule 1(24) of the *Public Works Act 1902*;
- It is considered that this application aligns with the following guiding aspect of the DPLH's Position Statement upon Renewable Energy Facilities:
"Facilities should be located near the grid to minimise clearing of vegetation for grid connection power lines. Solar arrays over a large area may have a significant effect on the clearing of native vegetation. Already cleared farming land may offer a practical solution to minimise any environmental impact." (page 3)



Development Application

Proposed Solar Farm and Battery Energy Storage System

Lot 201 (No. 3024) Perenjori-Three Springs Road and
Lot 25 (No. 17112) Midlands Road, Womarden

Prepared for Progressive Green Solutions
Prepared by TBB Planning
March 2026



Document Information



Development Application

Three Springs Solar Farm and BESS
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Acknowledgement of country



We respectfully acknowledge the Whadjuk people of the Noongar nation, as the traditional custodians of the land on which we live and work, and recognise their continuing connection.

We pay our respects to the Elders past, present and emerging for they hold the memories, the traditions, the culture and hopes that, through meaningful connection, we aim to apply to the design and planning of communities now and in the future.

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Revision	Status	Author	Approved by	Date Issued
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Table of Contents

1.0	Preliminary	5	5.5	State Planning Policies & Guidelines	23
1.1	Introduction	5	5.5.1	State Planning Policy 2.0: Environmental and Natural Resources	23
1.2	Pre-Lodgement Consultation	5	5.5.2	State Planning Policy 2.5: Rural Planning	23
1.3	Project Benefits	6	5.5.3	State Planning Policy 3.7: Bushfire Prone Areas	25
1.3.1	Proposal Need	6	5.6	WAPC Position Statement: Renewable Energy Facilities	27
1.3.2	Energy Transformation Strategy	7			
1.3.3	Western Australian Future Battery Energy Strategy	7	6.0	Conclusion	28
2.0	Site Details	8			
2.1	Legal Description	8			
2.2	Site Context	8			
2.3	Site Selection	12			
3.0	Development Proposal	13			
3.1	Proposal Summary	13			
3.1.1	Site Works	13			
3.2	Operational Details	14			
3.2.1	Operational Phase	14			
3.2.2	Construction Phase	14			
4.0	Technical Considerations	15			
4.1	Traffic, Access and Parking	15			
4.1.1	Traffic Review	15			
4.1.2	Access and Parking	15			
4.2	Acoustic Considerations	16			
4.3	Visual and Landscape Considerations	16			
4.3.1	Landscape and Visual Impact	16			
4.3.2	Glint and Glare	16			
4.4	Stormwater Management and Drainage	17			
4.5	Dust Management	17			
4.6	Aboriginal Cultural Heritage	17			
5.0	Planning Framework	18			
5.1	Shire of Three Springs Local Planning Strategy	18			
5.2	Shire of Three Springs Local Planning Scheme No. 2	19			
5.2.1	Zoning	19			
5.2.2	Land Use Classification and Permissibility	20			
5.2.3	Development Provisions	21			
5.3	Shire of Three Springs Draft Local Planning Scheme No. 3	22			
5.4	Local Planning Policies	22			

Technical Appendices

Appendix A

CERTIFICATES OF TITLE
DA FORMS
LANDOWNER CONSENT

Appendix B

DEVELOPMENT PLANS

Appendix C

TRANSPORT IMPACT STATEMENT

Appendix D

ACOUSTIC REPORT

Appendix E

VISUAL LANDSCAPE ARTISTIC IMPRESSIONS

1.0 Preliminary

1.1 Introduction

TBB Planning, on behalf of our client Progressive Green Solutions, submits this Application for Development Approval for a proposed solar farm and battery energy storage system (**BESS**) to be located on portions of Lot 201 (No. 3024) Perenjori-Three Springs Road and Lot 25 (No. 17112) Midlands Road, Womarden (**subject site**).

The proposal involves the development and use of a solar farm which comprises a solar panel array, PV inverter stations, BESS, substation and construction laydown areas.

The proposed development has an estimated construction cost of \$1 billion and is submitted to the Regional Development Assessment Panel (**DAP**) for determination.

In support of the Application for Development Approval, TBB has prepared the following report which outlines the matters relevant to the proposal, including: the site details; the proposed development particulars; technical considerations; and the relevant planning framework.

This development application is prepared as a package, involving collaborative inputs from the consultant team:

- Certificates of Title, DA Form and Landowner Consent (**Appendix A**)
- Development Plans – prepared by GHD (**Appendix B**)
- Transport Impact Statement – prepared by Transcore (**Appendix C**)
- Acoustic Report – prepared by Herring-Storer Acoustics (**Appendix D**)
- Visual Landscape Artistic Impressions – prepared by GHD (**Appendix E**)

1.2 Pre-Lodgement Consultation

The proponent has undertaken ongoing consultation with the local community and the Shire since mid-2025. On 16 August 2025, the proponent held a meeting and site visit at the subject site with surrounding landowners and their families. A subsequent meeting was held with the Shire's Acting Chief Executive Officer on 3 September 2025.

To inform the preparation and design of the proposed development, the project team undertook various liaison with the Shire via telephone and email correspondence during January to February 2026. TBB Planning contacted the Shire of Three Springs to introduce the proposed solar farm and BESS development and to seek preliminary advice regarding technical reporting, public consultation requirements, approval pathways and any general feedback on the plans.

The Shire provided guidance on the assessment pathways and shared links to recent DAP agenda and minutes for approved solar farm applications within the Shire. The Shire identified key referral agencies likely to comment on the proposal including the Department of Fire and Emergency Services (**DFES**), the Department of Water and Environmental Regulation (**DWER**) including its Noise Regulation Branch, and Main Roads Western Australia (**MRWA**). Community consultation was also discussed, with the Shire's acknowledgment of consultation fatigue in the locality due to multiple recent renewable energy proposals in recent years.

TBB Planning confirmed the intention to lodge a Development Application in March 2026 due to project timeframes, while committing to continued engagement with the Shire both prior to and following lodgement. TBB Planning advised that the proponent has indicated willingness to meet with Shire officers and/or Councillors (in person or via Teams) and to coordinate timing around a proposed site visit.

1.3 Project Benefits

1.3.1 Proposal Need

Infrastructure Australia, a statutory authority under the Western Australian Government, has highlighted the urgent need for major investment in network infrastructure and firming capacity. This infrastructure is essential to address the challenges and opportunities associated with integrating significant levels of utility-scale renewables and distributed energy resources.

The Cook Government has committed \$584 million through the 2024–25 State Budget to progress the ‘Clean Energy Link – North’ project, representing the State’s largest transmission investment in more than a decade. As part of this program, contracts totalling \$342 million have been awarded to various contractors led by Western Power, for the purpose of undertaking major expansion and upgrade works, including infrastructure that will enable greater renewable energy connections coming from the Mid-West region. [[Construction milestones hit as grid expansion powers ahead | Western Australian Government](#)]

The ‘Clean Energy Link – North’ project involves building and upgrading high-capacity transmission lines, terminals, substations, and transformers along a 354-kilometre corridor from Western Power’s Northern Terminal in Malaga through to a new terminal at Three Springs.



Figure 1 – Map of Clean Energy Link – North project network (Source: State Government).

The Clean Energy Link – North project will facilitate the connection of up to one gigawatt of additional renewable energy to supply customers across the network, catering for further new renewable energy development in the Mid-West region. The project is anticipated to be completed by the end of 2027.

These works are intended to strengthen the capacity of the network to absorb and transport renewable energy generation from the Mid-West and other regional areas, enabling the energy industry to reliably and safely connect wind, solar and battery projects and unlocking additional renewable energy capacity for Western Australia’s energy system. The proposed solar farm and associated BESS, to be located in Three Springs within the Mid-West Region, will directly complement the State’s investment in transmission infrastructure, including the Clean Energy Link – North and the new Three Springs Terminal. By establishing renewable generation and storage capacity in proximity to this upgraded network infrastructure, the project will be well positioned to contribute additional renewable energy into the system as capacity becomes available.

The solar farm will generate electricity from a renewable source, while the BESS will provide storage capability to manage variability in generation and demand, improving reliability and flexibility within the network. A BESS can respond quickly to fluctuations in the grid, and provides for black start capability, at a faster response than baseload power stations, assisting to balance supply and demand and respond rapidly in the network.

In this regard, the proposed development not only aligns with broader State energy transition objectives but also responds to the strategic strengthening of the transmission network in the Mid-West, supporting increased renewable energy integration, improved system resilience through dispatchable storage capacity, and the ongoing transition toward a lower-emissions electricity system.

1.3.2 Energy Transformation Strategy

The State's *Energy Transformation Strategy* (2019) sets out the objectives and actions to deliver affordable, efficient and reliable electricity within WA. The Energy Transformation Strategy outlines specific targets for renewable energy generation, energy storage and energy efficiency improvements.

The proposed solar farm, together with its associated BESS, is consistent with Objectives 1 to 3 of the *Energy Transformation Strategy* as outlined below:

1. **Maintain a secure and reliable electrical supply** – The proposed solar farm will contribute additional renewable generation capacity to the Mid-West Region, while the co-located BESS will provide storage and dispatch capability to support system reliability, manage peak demand and enhance grid stability in accordance with network operator requirements.
2. **Ensure affordable electricity for households and businesses** – By increasing large-scale renewable generation and storage capacity, the proposal will contribute to a more stable grid and therefore, a more competitive and stable wholesale electricity market. The integration of solar generation with storage assists in smoothing supply variability and supporting continued uptake of distributed renewable energy systems across Western Australia.
3. **Reduce energy sector emissions** – The proposed solar farm will generate electricity from a renewable source, directly contributing to emissions reduction within the energy sector. The proposed BESS will enable more efficient utilisation of renewable energy by storing excess generation for later dispatch, supporting long-term decarbonisation objectives and the State's emissions reduction targets.

The development proposal aligns and supports objectives 1 to 3 through the establishment of increased energy storage infrastructure that is grid-forming, addressing energy demand for the for the Mid-West region while facilitating the transition to a lower-carbon electricity system.

The proposed development will support the key goals in the Strategy by providing key infrastructure to assist increasing energy generation and storage capacities, ensure affordable energy, improve efficiency and resilience of the network at a local and regional level.

1.3.3 Western Australian Future Battery Energy Strategy

The *Western Australian Future Battery Energy Strategy* was published in 2019 by the Department of Jobs, Tourism, Science and Innovation (**JTSI**) seeking to provide a consistent and clear strategic intent to promote and facilitate the establishment of battery energy projects in Western Australia and to promote the State as a key destination for renewable energy infrastructure investment.

The Strategy promotes the development of battery energy projects through coordinated policy, infrastructure planning and industry support. The Strategy outlines specific actions to be undertaken across five focus areas including investment attraction, research and development, skills and training, infrastructure, and regulatory and policy frameworks.

The proposed BESS directly aligns with the strategic intent of the Strategy and gives practical effect to the actions in the Strategy by contributing to the expansion of battery storage development and infrastructure in Western Australia, and also offers opportunities for future battery maintenance and services.

2.0 Site Details

2.1 Legal Description

The subject site is located on portions of two freehold lots, being Lot 201 (No. 3024) Perenjori-Three Springs Road and Lot 25 (No. 17112) Midlands Road, Womarden. The lot details and landownership are shown in **Table 1** below, with a copy of the Certificate of Title provided in **Appendix A**.

A review of the Certificate of Title documentation identifies that there are existing easements to Western Power covering the above-ground power lines traversing through Lots 25 and 201, which are shown in **Figure 2** over page.

Table 1 – Lot Details.

Lot No.	Deposited Plan	Volume	Folio	Area (ha)	Registered Proprietor
201	420979	4007	669	3072.4966	WAMARDEN PTY LTD
25	65749	2748	679	2639.5296	BYANCANNA PTY LTD
Total Area				5,712.0262	

2.2 Site Context

The subject site is located in the suburb of Womarden within the municipality of the Shire of Three Springs, situated in the Mid West Region. The site is located approximately 3.2 kilometres north-east of the Three Springs townsite and is approximately 300 kilometres north of the Perth Metropolitan Area. The development area is located within existing cleared cropping land on the central western portion of Lots 201 and 25, adjoining Perenjori-Three Springs Road and Geebulla Road, and has a development footprint area of 300 hectares.

The subject lots (Lots 201 and 25) comprise of cleared land currently utilised for farming and cropping uses with some very small pockets of remnant vegetation, and salt lake systems are located generally on the eastern sides of the lots. The salt lake systems located on the eastern side of the development area are known Yarra Yarra Lakes. The subject site has frontage to, and is accessed via, Perenjori-Three Springs Road which connects to the townsite and broader regional road network. The western side of the development area on Lot 201 is bordered by Geebulla Road, which is an unsealed rural road connecting to Perenjori-Three Springs Road. The development area on Lot 25 is accessed via an existing unsealed crossover, directly opposite the intersection of Geebulla Road and Perenjori-Three Springs Road.

The surrounding land is predominantly rural in nature and is utilised for farming activities including cropping and associated rural infrastructure and access tracks, with pockets of retained remnant vegetation across adjoining properties.

A Western Power electrical power substation on Lot 22 directly adjoins the western side of the development area in Lot 25. There are existing 132kV and 330kV above-ground power lines traversing through Lots 25 and 201, which connect to the Western Power substation. The land adjoining the west of Lots 25 and 22 (Lots 50 M761, M762, M763 and M764) is occupied by agricultural cropping. It is noted that this land received a development approval by the Development Assessment Panel (**DAP**) in 2017 for a proposed solar farm (DAP ref. DAP/17/01181).

The Three Springs Golf Club and Golf Course is situated 1.5 kilometres to the east of the development area. There are no residential dwellings within the immediate vicinity of the site. Lot 201 contains a single residential dwelling in its far north-western corner, situated approximately 2 kilometres from the proposed solar arrays. The nearest dwellings near Lot 25 are located approximately 2.6 to 3.1 kilometres from the western boundary of Lot 25, measured from the proposed BESS location.

Refer to **Figures 2 to 8** for aerial, drone and site photographs depicting the subject site and its surrounding context.



Figure 2 – Aerial photograph of development area on subject site and immediate surrounds (Source: MNG Maps, 2026).



Figure 3 – Aerial photograph of subject site and surrounding context (Source: MNG Maps, 2026).



Figure 4 – Site photograph of Lot 25 and the Western Power substation (Lot 22), looking south from Perenjori-Three Springs Road.



Figure 5 – Site photograph of Perenjori-Three Springs Road and the subject site (Lots 25 and 201), looking east.



Figure 6 – Site photograph of the subject site (Lot 25), looking south-east.



Figure 7 – Drone photograph of the subject site and the Western Power substation (Lot 22), looking north-east.



Figure 8 – Drone photograph of the subject site, looking south-west from the northern edge of the development area on Lot 201.

2.3 Site Selection

The location of the subject site has been strategically assessed and identified, considering the following locational criteria as outlined below:

- Three Springs and the Mid-West Region have been identified as having strong renewable energy potential, including high solar irradiance and the availability of large, rural landholdings with compatible surrounding land uses, making the locality well suited to large-scale renewable energy infrastructure.
- The site's proximity to future planned transmission infrastructure, including the future Three Springs Terminal as part of the State Government's Clean Energy Link – North project, enables efficient grid connection and supports the strategic expansion of renewable energy generation within the region and State.
- The subject site adjoins the existing Western Power substation on Lot 22, providing a clear strategic advantage in terms of grid connection efficiency. The co-location of the solar farm and BESS adjacent to established electricity infrastructure minimises the extent of new connection works, reduces potential environmental disturbance, and supports an orderly and logical expansion of energy infrastructure within the locality.
- By selecting a site with the above-ground 132kV and 330kV power lines traversing the property, which is covered by existing easements to Western Power, it reduces the need for any additional easements and optimises the extent of works required for facilitating connection points.
- The subject site has been progressively cleared and is a significantly modified landscape due to historical agricultural and rural farming pursuits, resulting in the proposed development area to be generally cleared, requiring nil clearing of existing native vegetation and minimal shallow earthworks.
- The subject site has legal road frontage to Perenjori-Three Springs Road, which will be suitable for the delivery of materials during the construction period and would be visited by a minimal number of employees once it is operational.
- The rural land offers significant space for the proposed development to be appropriately managed with regard to bushfire risk management, visual amenity, acoustic mitigation, traffic movement, and other safety and amenity considerations, which have been addressed accordingly within this report.
- The subject site is not in close proximity to residential or other sensitive land uses. The nearest residential properties are located between approximately 2.6 to 3.1 kilometres from the subject site (distance measured from the proposed BESS location).

3.0 Development Proposal

3.1 Proposal Summary

The proposal seeks approval for the development and use of a solar farm and a BESS on the subject site, covering a development footprint area of approximately 300 hectares.

The solar farm has a 152.95 MW (AC) inverter/export capacity and a 191.19 MWp (DC) PV array peak output. The BESS has a 250MW power capacity and 2 GWh storage capacity. The proposal will connect to the 330kV Western Power substation/terminal to the west.

More specifically, the proposed solar farm, BESS and the supporting electrical and operational infrastructure comprises the following particulars:

- Solar panel array;;
- PV inverter stations;
- 70 Power Conversion Systems (PCS);
- BESS with a total of 350 battery containers;
- Substation and Point of Connection;
- Four construction laydown areas;
- Sealed vehicle crossover to provide access between Perenjori-Three Springs Road and the internal access roads on Lot 25 (south);
- Sealed internal access roads located around the substation and BESS;
- Unsealed access road connecting to the southern edge of the development area in Lot 25, to be utilised generally for emergency access (or access for other minor needs as required), which connects to an existing informal unsealed road outside the development area; and
- Security fencing on the development area boundary.

Further details and specifications of the proposal are contained within the Development Plans at **Appendix B**.

The solar PV array and overall site layout including internal roads remain subject to optimisation and may have minor modifications with equipment selection and further detailed design investigations, including geotechnical, hydrology/flood, environmental and constructability assessments.

3.1.1 Site Works

No native vegetation clearing is proposed as part of this application, as the development footprint area only covers land already cleared and utilised for farming and agricultural cropping purposes.

Each solar array only requires installation of minor footings to a shallow depth, meaning earthworks and cut-and-fill requirements are extremely minor and limited to localised grading for the BESS, substation, drainage and access tracks, maintaining natural grades and drainage flow paths where practicable.

Site works will be undertaken in accordance with a Construction Management Plan to the Shire's satisfaction, anticipated to be implemented as a condition of approval.

3.2 Operational Details

3.2.1 Operational Phase

During its operation, the solar farm will be monitored remotely, meaning that there is no requirement to have employees on-site on a daily basis. Trips will generally be limited to scheduled inspections/maintenance and infrequent security checks, typically around once per day or week using light vehicles, which will have a negligible impact on the surrounding local road network (refer to **section 4.1.1** and **Appendix C** for further details).

Notwithstanding this, a maintenance base for the solar farm and BESS will be established within the town of Three Springs, which will support at least five permanent staff who will reside locally. The maintenance base does not form part of this application.

3.2.2 Construction Phase

Construction of the solar farm is anticipated to run for about 12 to 14 months. The construction timeframe involved for the BESS and point of connection is anticipated to be 14 months.

The proponent is proactively investigating three options and locations for workforce accommodation, which will be either within the Three Springs townsite or two other nearby locations.

The construction workforce required for the solar farm is anticipated to average between approximately 100 workers with a peak of up to 180 workers. The BESS and Point of Connection construction workforce will range from 120 to 150 workers. During construction, project management staff will be located on-site to control the works, with an anticipated 30 staff required for the solar farm and 25 staff for the BESS.

Construction days and work hours will be typically from 6:00am to 6:00pm, seven days per week. Start times for construction workforce will vary from 6:00am to 8:00am and finish times will vary from 4:00pm to 6:00pm.

Four construction laydown areas will be established within the site for equipment and materials during construction.

A Construction Management Plan will be prepared during detailed design to the satisfaction of the Shire and anticipated via a suitable condition of approval. The Construction Management Plan will outline construction management measures and mitigation to address potential impacts.

4.0 Technical Considerations

4.1 Traffic, Access and Parking

4.1.1 Traffic Review

The proposed development has been subject to a detailed traffic and transport analysis in the form of a Transport Impact Statement (**TIS**) prepared by Transcore in accordance with the Western Australian Planning Commission *Transport Impact Assessment Guidelines*. The TIS is the appropriate level of reporting where the expected traffic generation is between 10 - 100 vehicle trips in the development's peak hour. The report assesses the impacts on the surrounding road network arising from the development's proposed traffic, access and parking arrangements (refer to **Appendix C**).

The anticipated mode of travel for construction workforce will be via bus (80%) and private vehicle (20%).

Construction deliveries are anticipated to generally use standard 19m semi-trailers, 27.5m B-Doubles and potentially 36.5m B-Triples in size. As discussed in the TIS, Three Springs-Morawa Road and Perenjori-Three Springs Road are classified as RAV6 and RAV7 Network Roads, and the movement of 36.5m B-Triples through this intersection is formally permitted. Details relating to number and type of vehicles involved will be confirmed later in the project closer to the construction phase and if required, relevant permits will be obtained from Main Roads Western Australia (**MRWA**).

As part of the Construction Management Plan, a Construction Traffic Management Plan (**CTMP**) will be prepared to the Shire's satisfaction. The CTMP will generally schedule deliveries outside peak periods, direct heavy vehicles and workforce buses along the nominated route and ensure all workforce parking occurs on-site.

Once operational, the solar farm and BESS will be remotely monitored and as such no permanent staff are required on-site. Trips will generally be limited to scheduled inspections/maintenance and infrequent security checks, typically around once per week using light vehicles. These occasional trips will generate very minimal additional traffic and will not affect the performance or safety of the surrounding roads.

The TIS provides that the estimated traffic generated by construction phase will be 48 trips in the AM peak period and 48 trips in the PM peak period, comprising a mix of comprising passenger vehicles, 4WD, utes and buses.

The TIS confirms the level of construction and operational traffic generated by the proposal can be readily accommodated on Perenjori-Three Springs Road, Midlands Road, Three Springs-Morawa Road and the surrounding road network without any upgrades, and no adverse impacts on external traffic are anticipated.

4.1.2 Access and Parking

Vehicular access to the proposal will be provided from Perenjori-Three Springs Road via two primary entry points.

Access to Lot 25 (southern portion of the site) will be via the proposed sealed site access road and crossover shown on the accompanying Development Plans, connecting directly from Perenjori-Three Springs Road. This will be the primary access point for construction related traffic, noting a construction laydown area is located next to this access point inside Lot 25.

Access to Lot 201 (northern portion of the site) will be via Geebulla Road, an existing unsealed road accessed from Perenjori-Three Springs Road.

In addition, an unsealed internal access track (referred to as the 'Moonlight Access Road' on the Development Plans) will connect to the southern edge of the development area within Lot 25. This track is proposed to be used primarily for emergency access, and may also facilitate minor operational or construction access as required. The Moonlight Access Road connects to an existing informal unsealed track located outside the development area.

All construction parking will be contained on site and managed under the CTMP. No dedicated parking provision is required for operational traffic, as the facility will be unmanned and only subject to infrequent light-vehicle visits for routine inspections, maintenance and security checks which are anticipated to be around once per week.

4.2 Acoustic Considerations

An Environmental Noise Assessment and associated Acoustic Report has been prepared for the proposed development which addresses the *Environmental Protection (Noise) Regulations 1997*. The report assesses potential operational noise emissions from the proposal.

The nearest noise-sensitive premises have been identified as two residential dwellings: one located approximately 2.9 kilometres to the west of the BESS (on Lot M763); and the other approximately 2 kilometres to the north-west of the solar array (within the north-western corner of Lot 201). The location of these premises is shown in Figure 2.1 of the Acoustic Report.

The nearest noise sensitive premises have been identified as two residential dwellings, with one located 2.9 kilometres to the west (on Lot M763) from the BESS and the other one located approximately 2 kilometres north-west (on north-western corner of Lot 201) from the solar array. Refer to Figure 2.1 in the Acoustic Report for the location map.

To establish representative ambient noise levels, the assessment methodology included continuous noise monitoring at the subject site from 13 to 19 February 2026.

The assessment undertaken demonstrates that in the worst case scenario, the noise emitted from the proposal will comply at all times (day, evening and night periods) with the assigned levels determined in accordance with the *Environmental Protection (Noise) Regulations 1997*.

Refer to the Acoustic Report prepared by Herring-Storer Acoustics contained in **Appendix D**.

4.3 Visual and Landscape Considerations

4.3.1 Landscape and Visual Impact

Potential visual receptors are limited to intermittent road users on Perenjori-Three Springs Road. In these locations, the site's low-lying topography will filter near-field views. The surrounding landscape is characterised by large lot rural uses with low visual sensitivity and a system of salt lakes to the east (Yarra Yarra Lakes).

From the surrounding properties, potential views are expected to be extremely filtered and intermittent, generally limited to oblique glimpses across breaks in vegetation rather than continuous frontage views.

The proposal adopts a low-profile and sits on relatively flat landform, further reducing visibility. Ancillary equipment, fencing and electrical infrastructure will utilise non-specular, low-contrast finishes to avoid visibility from adjoining roads.

Refer to Visual Landscape Artistic Impressions prepared by GHD at **Appendix E**.

4.3.2 Glint and Glare

The potential for glint and glare is inherently low for modern photovoltaic facilities because modules are designed to absorb incident light. In the local context, the solar arrays are positioned in low ground and experienced by road users largely in motion, further reducing the likelihood of specular reflection aligning with a viewer for any meaningful duration.

Design and operational measures will be implemented to ensure any residual risk remains negligible. Modules will be specified with factory-applied anti-reflective coatings and installed on the single-axis trackers. Current panel specifications prioritise light absorption over reflectance, improving efficiency and minimising potential glint and glare.

The solar array layout aligns with land contours and avoids directing module faces towards known view corridors from Perenjori-Three Springs Road. Above-ground cabling will be minimised and ancillary structures finished in matte, recessive colours to avoid incidental glare.

Given the site's low-lying and flat topography, the isolated rural setting, and the measures above, the risk of adverse glint or glare to road users or distant receptors is very low and does not constitute a constraint to approval.

The site is not within proximity triggers for detailed aviation assessment, with the Perenjori Aerodrome being located approximately 45 kilometres to the north-east, and there are no major commercial runway approach paths or aerodromes safeguarding constraints affecting the layout.

4.4 Stormwater Management and Drainage

Stormwater runoff from the proposed solar farm, BESS and substation hardstand area, access roads and tracks, and associated equipment can be managed on-site. If required by the Shire, a Stormwater Management Plan can be prepared as a condition of approval.

Water management measures will maintain pre-development drainage patterns and protect water quality during construction and operation, with construction controls (including dust suppression, erosion and sediment management, stabilised access and spill response) addressed through the Construction Management Plan.

During operation, stormwater will generally have localised treatment and infiltration around access tracks and hardstands where required, and no new off-site discharge points are proposed at this point in time.

4.5 Dust Management

There is potential for dust emissions as a result of the construction phase of the development. Dust mitigation measures will be appropriately addressed as part of a Construction Management Plan, which will be implemented as a condition of approval.

On-going dust emissions are not expected once construction is completed.

4.6 Aboriginal Cultural Heritage

As part of this application, a desktop search of the Aboriginal Cultural Heritage Inquiry System (**ACHIS**) was conducted to determine whether there are any registered sites on the subject site. Review of the ACHIS mapping indicates that Lots 25 and 201 contain the below places under the Aboriginal Cultural Heritage Register:

- Registered Place 24382 - Yarra Yarra Lakes.
- Registered Place 22432 – Bimara.
- Historic Place 29768 - ERM Power Station - Isolated Artefacts (located in solar array development area on Lot 25).
- Lodged Place 22433 - Bimira Claypan (not located on or near development area).
- Lodged Place 22434 - WCRS/03 Artefact Scatter (not located on or near development area).

Notwithstanding and having regard to the 'Aboriginal Heritage Due Diligence Guidelines', the proponent is aware of their obligations under the *Aboriginal Heritage Act 1972*. The proponent is currently undertaking Indigenous consultation and Aboriginal Cultural Heritage surveys.

5.0 Planning Framework

5.1 Shire of Three Springs Local Planning Strategy

The Shire of Three Springs *Local Planning Strategy* was endorsed by the WAPC in 2014, and was prepared to provide a strategic basis for land use planning decisions within the Shire over the next 10 to 15 years. The Strategy sets out a vision with clear corresponding objectives and actions to guide future growth and development in the Shire, addressing a range of strategic matters involving urban development, rural residential development, industrial development, transport network, heritage, tourism, recreation, sustainable agriculture, protection of environment and ecological values, land management, water and raw materials.

The Strategy's vision recognises growth in the resources industry within the Mid West Region and identifies a key role for the Shire in supporting the infrastructure required for industry, including infrastructure associated with power generation.

The Strategy includes an objective: *To support alternative means of power generation provided that it does not adversely impact on the amenity of adjoining landowners* (Objective 3.1.1), which encompasses renewable energy generation.

The Strategy Map designates the development area on the subject site as 'Rural' and 'General Industry Investigation Area' as shown in **Figure 9**.

Noting the endorsement date of the Strategy is 12 years old, it is dated and has not been translated into the zoning framework of Draft *Local Planning Scheme No. 3* (detailed in **section 5.3** below). As such, the current statutory planning weight rests with the draft Scheme provisions, which retain the 'Rural' zoning over the subject land and do not identify any industrial zoning or investigation area.

Overall, the proposed solar farm and BESS, as a renewable energy project as an “*alternative means of power generation development*”, is consistent with the vision, objectives and strategic intent of the Strategy in relation to facilitating power generation within the Shire.

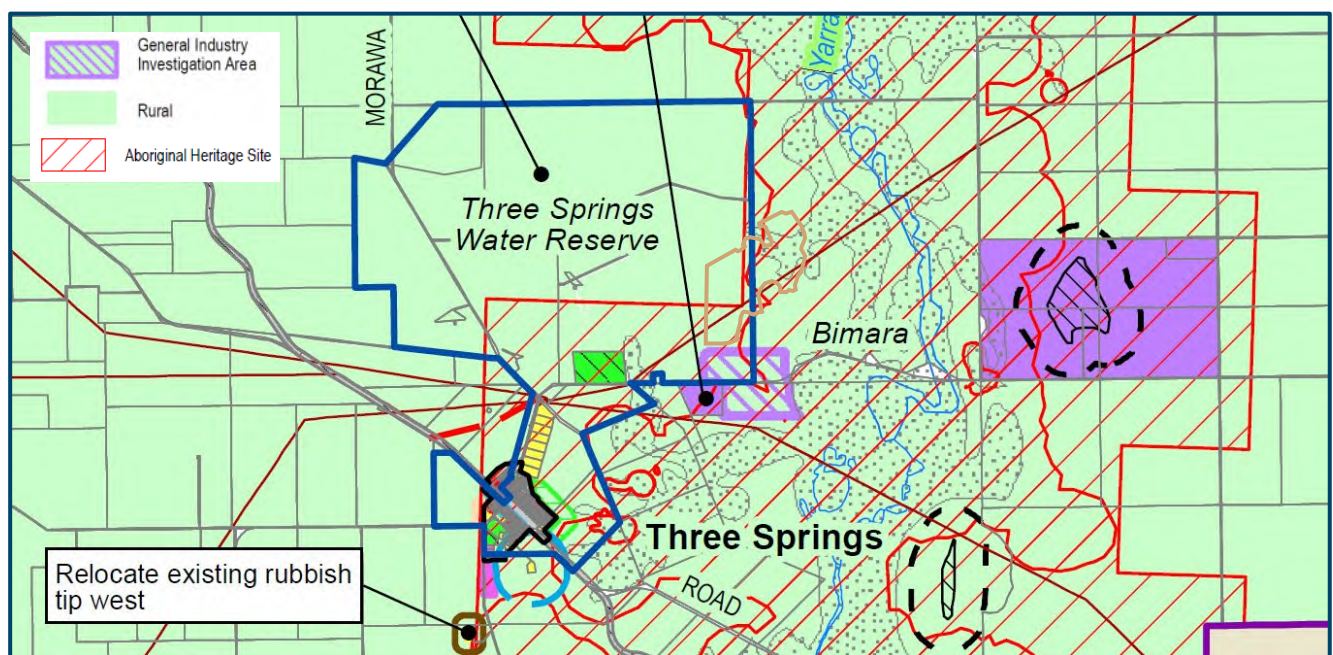


Figure 9 – Local Planning Strategy Map extract of the subject site.

5.2 Shire of Three Springs Local Planning Scheme No. 2

5.2.1 Zoning

The development area and wider subject site are zoned 'Rural' under the Shire's *Local Planning Scheme No. 2 (LPS2)*, as shown in **Figure 10** below. Access to the development is proposed from Perenjori-Three Springs Road, which is reserved as a 'Local Distributor Road'.

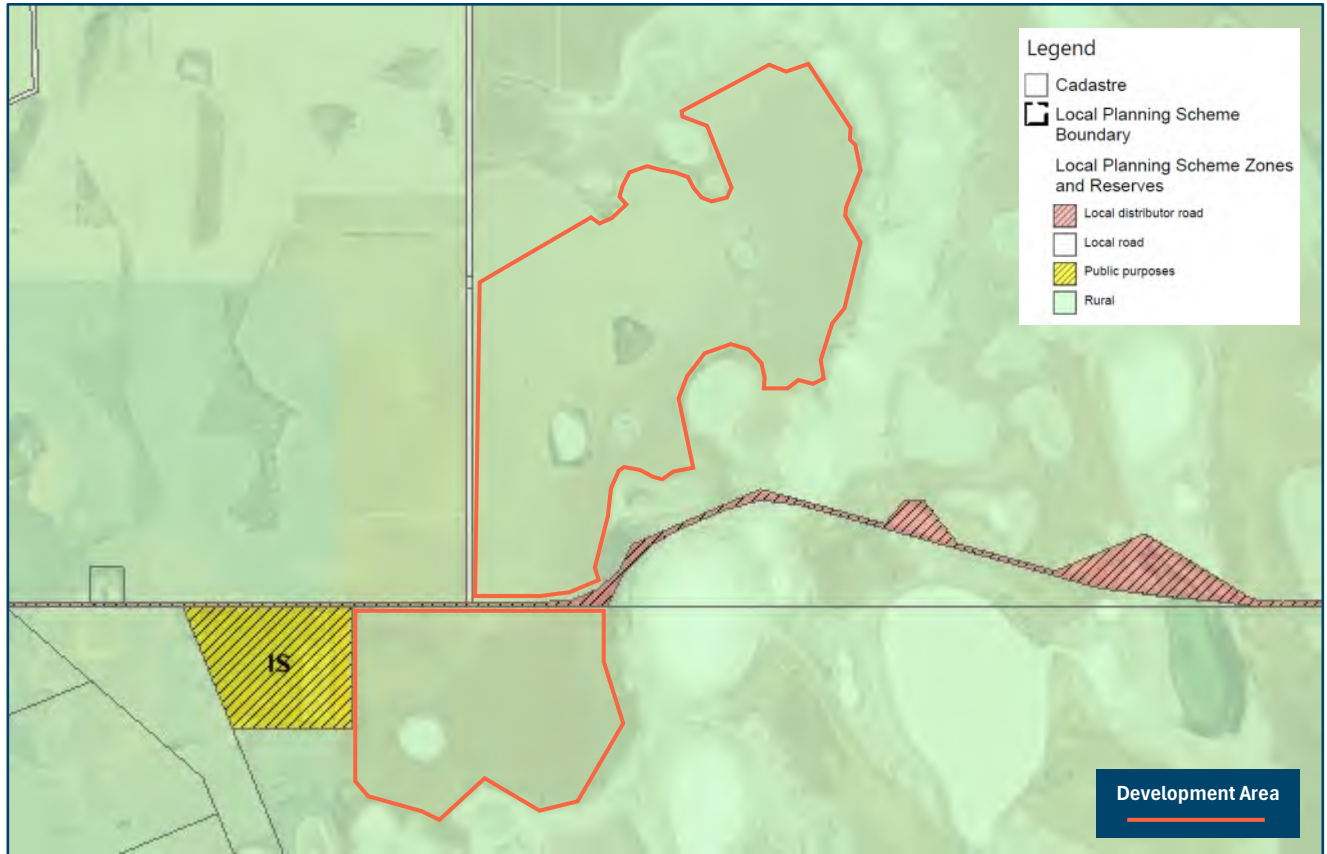


Figure 10 – LPS2 Zoning Map of the subject site with aerial underlay (Source: PlanWA, 2026).

Pursuant to Clause 16 in LPS3, the Rural zone has the following objective:

To provide for the sustainable use of land for the agricultural industry and other uses complimentary to sustainable agricultural practices, which are compatible with the capability of the land and retain the rural character and amenity of the locality.

The proposal for a solar farm and BESS is consistent with the above objective of the Rural zone for the following reasons:

- The development area represents only a small portion of the wider subject lots and the remaining land will continue to be used for cropping and farming purposes, supporting ongoing agricultural productivity and industry within the Shire.
- The footprint of the development area is located within an area that has been previously cleared and used for agricultural purposes. No additional clearing is proposed, thereby limiting disturbance to the site and protecting existing environmental and ecological values.
- Due to the low profile of solar array infrastructure and the site's relatively flat topography, the development is anticipated to have a low visual impact and to be largely consistent with the surrounding rural landscape.
- The proposed solar farm and BESS are of a form and scale that is compatible with its surrounding rural setting and is not expected to prejudice the rural character or amenity of the locality.

5.2.2 Land Use Classification and Permissibility

This proposal for a solar farm and BESS is most suitably classified under the land use category of ‘Renewable Energy Facility’ in LPS2, which is defined as:

renewable energy facility means premises used to generate energy from a renewable energy source and includes any building or other structure used in, or in connection with, the generation of energy by a renewable resource. It does not include solar panels or a wind turbine located on a lot with a single house where the energy produced only supplies that house or private rural use or anemometers.

The proposed solar farm component is consistent with the above definition as the development involves the use of premises to generate energy from a renewable energy source, being solar radiation captured by photovoltaic (PV) panels and converted to electricity for storage in the BESS and export to the electricity network.

The definition expressly includes “any building or other structure used in, or in connection with, the generation of energy by a renewable resource.” The proposal incorporates buildings and structures that are integral to, and directly associated with, renewable energy generation and its safe operation, including solar arrays and mounting structures, inverters and associated electrical infrastructure, transformers, cabling, switchgear, control and communications infrastructure, and the BESS and associated equipment required to store and dispatch electricity generated by the solar farm facility. The BESS forms part of the broader renewable energy facility as it is used in connection with the generation and management of energy derived from the renewable resource.

Accordingly, the proposed solar farm and BESS are appropriately classified as a Renewable Energy Facility under LPS2 and warrant support by the Shire in this regard.

As per the Zoning Table in LPS2, Renewable Energy Facility is an ‘A’ (discretionary) use in the Rural zone, meaning that the use is not permitted unless the local government has exercised its discretion by granting development approval after giving notice in accordance with Clause 64 of the Deemed Provisions.

5.2.2.1 BESS Land Use Classification - Renewable Energy Planning Code and Guidelines

It is noted that the WAPC has released for advertising, a *Renewable Energy Planning Code and Guidelines*. The Code and Guidelines currently provide draft guidance for wind farms only, with additional code sections to be prepared in the future for transmission systems, solar farms, and battery energy storage systems.

Under the draft Code and Guidelines, a ‘Battery Energy Storage System’ is defined as follows:

Battery energy storage system – means the use of premises for the operation of one or more battery storage devices that:

- a. convert electricity into stored energy; and*
- b. release stored energy as electricity; and*

includes any equipment necessary for the operation of the plant.

Going forward, the proposed use of ‘Battery Energy Storage System’ is anticipated to be introduced as a land use definition in the *Planning and Development (Local Planning Schemes) Regulations 2015*.

To be clear, there is no impediment before the local government to consider this application now, as the draft Codes are clear that they will not apply retrospectively, and are some time away from being finalised, as advertising is due to close in April 2026 and the final amendments will be determined by the WAPC and Parliamentary Counsel’s Office.

5.2.3 Development Provisions

Clause 32 and Table 7 of LPS2 set out the additional site and development requirements applicable to the proposal and subject site. An assessment of the applicable development provisions in LPS2 is provided in **Table 2** over page.

Table 2 – LPS2 Development Provisions Assessment.

No. & Zone	Development Requirement	Applicant Response
1. All Zones	Development Requirements 1) <i>The development requirements relating to setbacks and open space / landscaping are set out in Schedule 2.</i> Open Space / Landscaping (Schedule 2): <i>Not applicable to the Rural zone.</i> Minimum Setbacks – Rural Zone (Schedule 2): <i>Front / Street – 20m</i> <i>Side – 10m</i> <i>Rear – 20m</i>	Landscaping and open space provisions are not applicable to the site. No buildings or significant built form are proposed within the setback areas to the lot boundaries. Some of the solar array panels may come within 10-20m of certain parts of the lot boundaries, but they are separated by a security fence and access tracks. There are no directly adjoining residential properties as most of the surrounding land is utilised for farming and agriculture and therefore, appropriate separation is maintained and there are no impacts to overshadowing, visual bulk, glint and glare, and privacy concerns. As a result, the proposal is consistent with the intent of the setback controls and will not adversely affect the adjoining properties, and surrounding context.
5. Rural Zone	Additional Dwelling on Farms (not applicable) Nutrient Run-off 2) <i>In considering applications for development approval, the local government:</i> (a) <i>shall ensure that the development proposed will not result in any net export of nutrients from the land to any wetland, watercourse or underground aquifer;</i> (b) <i>may require no further clearing of vegetation;</i> (c) <i>shall prohibit stormwater from draining directly into existing water bodies or watercourses; and</i> (d) <i>may require all stormwater to be disposed of on-site.</i>	If required by the Shire, a Stormwater Management Plan can be prepared as a condition of approval (refer to section 4.3 above for further discussion on stormwater and drainage).
15. Scheme Area	Remnant Vegetation, Environmentally Significant Flora and Fauna <i>Any rezoning, subdivision, or development proposal on land containing environmentally significant flora, fauna and / or remnant vegetation shall be referred to the Department of Parks and Wildlife and/or the Department of Environmental Regulation for advice. The proponent will be required to identify, assess, and put in place measures to protect the environmentally significant remnant vegetation, flora and/or fauna prior to determination.</i>	The development footprint area is wholly confined to land that has been previously cleared and is currently utilised for farming and agricultural cropping purposes, and there is no proposal to clear any remnant native vegetation within the development application area. As the proposal avoids any clearing of native vegetation, no direct impacts are anticipated to environmentally significant flora species, fauna habitat, ecological linkages, or areas of conservation value. The development will not result in further fragmentation of remnant vegetation or loss of habitat trees.
20. Scheme Area	Car Parking 1) <i>Car parking requirements are to be provided in accordance with Schedule 1 – Car Parking Requirements, unless otherwise determined by the local government and shall be designed, constructed, and maintained to the satisfaction of the local government.</i>	All construction parking will be accommodated on site and managed in accordance with the Construction Traffic Management Plan. The proposed development will be unmanned during operation and will only generate infrequent light-vehicle visits (approximately once per week) for routine inspections, maintenance and security checks.

No. & Zone	Development Requirement	Applicant Response
	Car Parking (Schedule 1): <i>Renewable Energy Facility – Determined by the local government.</i>	Given the absence of operational staff and customers, there is no ongoing parking demand associated with the use. As the LPS2 provides that parking requirements for a Renewable Energy Facility are to be determined by the local government, it is considered that no dedicated parking provision or detailed parking assessment is warranted in this instance.

As demonstrated in the table above, the proposed development is consistent with the intent of the development provisions under LPS2 and warrants support by the Shire in this regard.

5.3 Shire of Three Springs Draft Local Planning Scheme No. 3

At its Ordinary Council Meeting (**OCM**) held on 26 July 2023, the Council resolved to adopt the Draft *Local Planning Scheme No. 3 (LPS3)* and forward to the Western Australian Planning Commission seeking its consent to advertise, as well as providing a copy of LPS3 to the Environmental Protection Authority (**EPA**) to determine whether the Scheme should be formally assessed. The EPA's referral assessment occurred during December 2023, and public advertising of Draft LPS3 closed on 25 October 2024.

The scheme maps from the 26 July 2023 OCM Agenda show that the subject site retains its 'Rural' zoning under Draft LPS3. In the Draft LPS3 scheme text from the public advertisement period, Renewable Energy Facility remains capable of approval in the Rural zone ('A' use), and the objectives for the Rural zone have been expanded to include the following objective which is supportive of the proposal:

To provide for a range of non-rural land uses where they have demonstrated benefit and are compatible with surrounding rural uses.

The development requirements applicable to the Rural zone and Renewable Energy Facility remain broadly consistent with those under LPS2, and no additional scheme-based development requirement considerations are anticipated for the proposal.

As per the scheme maps in the 26 July 2023 OCM Agenda, Perenjori-Three Springs Road remains reserved as a 'Local Distributor Road'.

5.4 Local Planning Policies

There are no Local Planning Policies applicable to the subject site or proposal.

5.5 State Planning Policies & Guidelines

5.5.1 State Planning Policy 2.0: Environmental and Natural Resources

State Planning Policy 2.0: Environmental and Natural Resources (SPP2.0) promotes responsible planning by integrating environment and natural resource management with broader land use planning and decision-making. SPP 2.0 aims to resolve land use and natural resource protection conflict; and outlines general measures for matters such as water, air quality, soil and land quality, biodiversity, agricultural land and rangelands, basic raw materials, marine resources, landscapes and energy efficiency.

Section 5.10 (Greenhouse Gas Emissions and Energy Efficiency) of SPP 2.0 details the need to increase the efficiency with regard to energy use within the State, with the primary objective is to:

reduce greenhouse gas emissions by means including increasing energy efficiency, decreasing reliance on non-renewables, and increasing usage of renewable energy sources.

Further, Section 5.10 states that planning decision making should:

- (iii) *Support the use of alternative energy generation, including renewable energy, where appropriate.*
- (iv) *Support the adoption of adaptation measures that may be required to respond to climate change.*

The development facilitates the generation and storage of renewable energy, thereby contributing to reduced greenhouse gas emissions and decreasing reliance on non-renewable energy sources. The inclusion of battery storage further enhances energy efficiency and network reliability by enabling the capture and redistribution of renewable energy during peak demand periods. Importantly, the infrastructure has been carefully sited and designed to avoid and minimise potential environmental, agricultural and visual impacts, ensuring that the transition toward cleaner energy generation is achieved in a responsible and sustainable manner consistent with State planning objectives. The proposed solar farm, BESS and associated infrastructure is consistent with the relevant policy measures and objectives of SPP 2.0.

5.5.2 State Planning Policy 2.5: Rural Planning

State Planning Policy 2.5: Rural Planning (SPP2.5) applies to rural land and rural land uses, as well as land that may be impacted by rural land uses. SPP2.5 seeks to protect and preserve Western Australia's rural land assets due to the importance of their economic, natural resource, food production, environmental and landscape values. SPP2.5 includes policy measures aimed at protecting rural land while encouraging diversity of compatible rural land uses.

As per Section 3.3 in SPP2.5, the policy is applicable to development proposals on rural zoned land.

Pursuant to Clause 29 in the Shire's LPS2, SPP2.5 is to be read as part of the Scheme. **Table 3** below provides an assessment against the relevant objectives and policy measures in SPP2.5

Table 3 – SPP2.5 Objectives and Policy Measures Assessment.

Objective / Policy Measure		Response	Achieved
4.0 Policy Objectives			
(b)	<i>Provide investment security for existing, expanded and future primary production and promote economic growth and regional development on rural land for rural land uses.</i>	The proposed solar farm and BESS support economic growth and infrastructure investment within a rural area. The development does not displace or constrain surrounding primary production and contributes to regional development outcomes.	✓
(e)	<i>Avoid and minimise land use conflicts.</i>	The proposal does not introduce a sensitive land use (such as residential development) that would compromise agricultural operations. The development is compatible with surrounding rural activities and will not create land use conflict.	✓

(g)	<i>Protect and sustainably manage environmental, landscape and water resource assets.</i>	The development is located on previously cleared land and has been sited to avoid impacts on environmental assets or any native vegetation clearing. Environmental assets are not anticipated to be affected. The proposal has been subject to visual impact and landscape review as detailed in section 4.3 above.	
5.1 Protection of rural land and land uses (Policy Measures)			
(a)	<i>requiring that land use change from rural to all other uses be planned and provided for in a planning strategy or scheme;</i>	The proposal is consistent with the Shire of Three Springs <i>Local Planning Strategy</i> , refer to section 5.1 of this report.	✓
(b)	<i>retaining land identified as priority agricultural land in a planning strategy or scheme for that purpose;</i>	The development area on the subject site is not identified as priority agricultural land in the Shire of Three Springs <i>Local Planning Strategy</i> or LPS2.	✓
(c)	<i>ensuring retention and protection of rural land for biodiversity protection, natural resource management and protection of valued landscapes and views;</i>	The siting and layout of the solar farm and BESS avoids any clearing of native vegetation. The proposed development does not negatively impact upon any valued landscapes and views as demonstrated in section 4.3 of this report and Appendix E .	Low to negligible impact
(d)	<i>Protect land, resources and/or primary production activities through the State's land use planning framework.</i>	The proposal does not involve subdivision or fragmentation of rural land and does not undermine the ongoing use of surrounding land on the subject site (outside the development area) for primary production and agricultural uses. The identified location for the development area is only a relatively small portion of the subject site's combined lots areas and land currently used for farming purposes.	✓
(e)	<i>creating new rural lots only in accordance with the circumstances under which rural subdivision is intended in Development Control Policy 3.4: Subdivision of rural land;</i>	No subdivision or new lots are proposed for the subject site.	✓
(f)	<i>preventing the creation of new or smaller rural lots on an unplanned or ad-hoc basis, particularly for intensive or emerging primary production land uses;</i>		✓
(g)	<i>Comprehensively plan for the introduction of sensitive land uses that may compromise existing, future and potential primary production on rural land.</i>	The solar farm and BESS are not sensitive land uses and will not compromise existing or future primary production. The development can operate without restricting agricultural practices on adjoining land. No sensitive land uses are proposed or impacted by the proposal, refer section 4.2 and Appendix D	✓
(h)	<i>accepting the impacts of well-managed primary production on rural amenity.</i>	The development does not prevent the landowner from undertaking rural or agricultural pursuits on the subject site.	✓
5.5 Regional variation, economic opportunities and regional development (Policy Measures)			
(a)	<i>Promote rural zones in schemes as flexible zones that cater for a wide range of land uses.</i>	The proposal represents an appropriate and contemporary diversification of rural land use consistent with the flexible intent of the Rural zone and the zone objectives.	✓

Having regard to the relevant objectives and policy measures of SPP2.5, the proposed solar farm and BESS represent an appropriate and compatible form of development within the Rural zone. The proposal supports economic growth and regional development, avoids land use conflict, and does not compromise the ongoing viability of primary production or environmental assets. Accordingly, the proposed development is considered to be consistent with the intent and provisions of SPP2.5.

5.5.3 State Planning Policy 3.7: Bushfire Prone Areas

State Planning Policy 3.7 – Bushfire (SPP3.7) seeks to implement effective risk-based and land use planning and development to improve the protection of property and infrastructure from bushfire impacts. The policy provides the framework and foundation for addressing bushfire risk management through the implementation of land use planning and construction practices.

The Department of Fire and Emergency Services bushfire mapping identifies that portions of the development area on the subject site are located within a ‘Bushfire Prone Area’ as shown in **Figure 6** below.

Importantly, it is noted that the proposed BESS and substation is located outside of the Bushfire Prone Area designation over the development area on the subject site, and a majority of the solar arrays are also located outside the Bushfire Prone Areas.

The proposed development does not contain any ‘habitable buildings’ as detailed further in the proceeding section, and therefore, Section 4 of SPP3.7 is not triggered, which means a Bushfire Management Plan (**BMP**) is not required to be prepared in accordance with Section 7.1(ii) of SPP3.7 due to the policy not applying to this particular development application.

Nonetheless, the proponent has already engaged Western Environmental to undertake appropriate bushfire risk assessment and management planning under the CFA Guidelines, and the proponent has no objection for a Bushfire Management Plan can be implemented as a condition of approval.

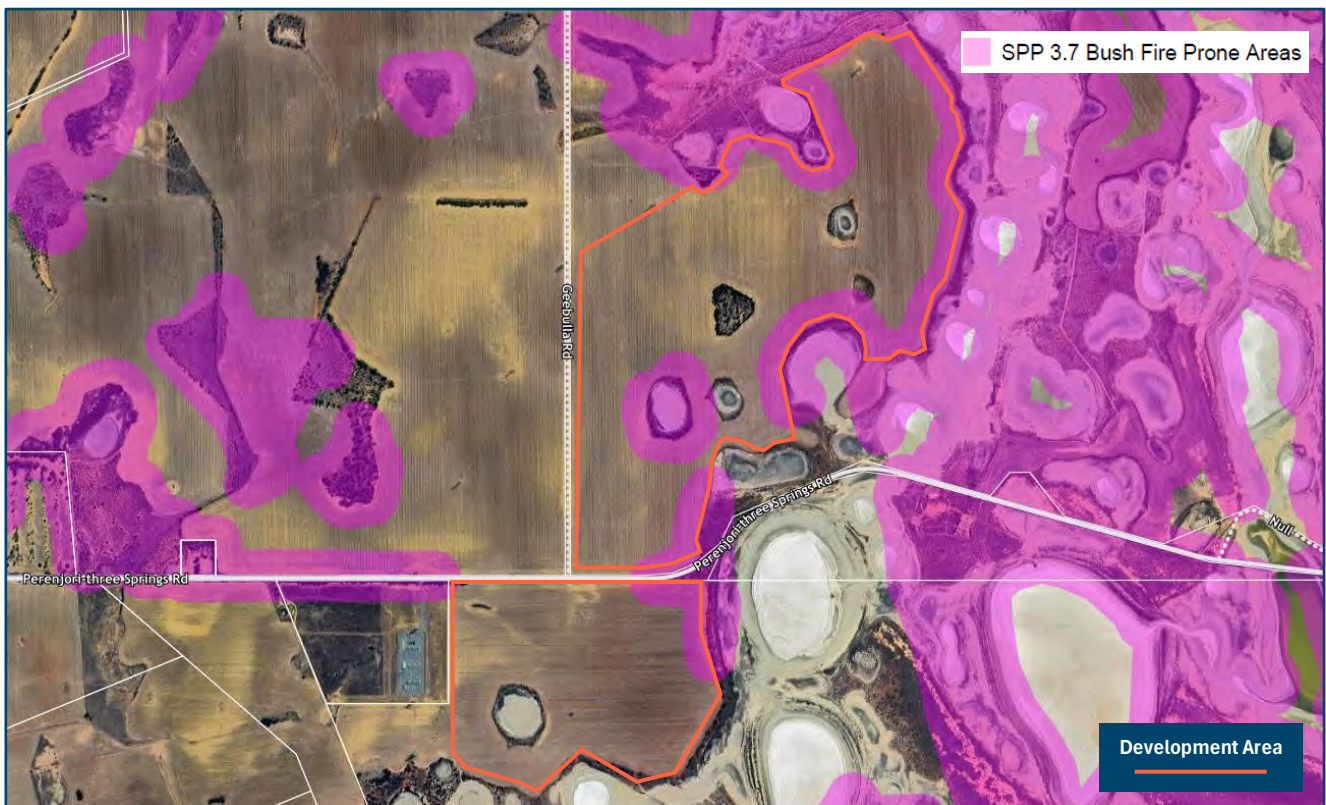


Figure 11 – Bushfire Prone Area Mapping over development area on subject site (Source: MNG Maps, 2026).

5.5.3.1 Habitable Building Definition

Under Section 4, SPP3.7 applies to planning proposals within a designated Bushfire Prone Area where the proposal results in: an intensification of development or land use; an increase in visitors, residents, employees; or otherwise increases bushfire risk to the surrounding sites; and where the proposal falls within the policy’s defined triggers for the specific type of planning proposal.

For development applications where the development site has a Bushfire Attack Level (**BAL**) rating of above BAL-LOW, the trigger relates to the construction of a habitable building, which is defined under SPP3.7 as:

habitable building means a permanent or temporary structure on land that –

- a. Is fully or partially enclosed; and
- b. Has at least one wall of solid material and a roof of solid material; and
- c. Is used for a purpose that involves the use of the interior of the structure by people for living, working, studying or being entertained, as defined in the *Planning and Development (Local Planning Schemes Regulations 2015)*.

The proposal is for a solar farm, a BESS and associated supporting electrical and operational infrastructure; where these components are non-habitable by nature and do not constitute a habitable building for the purposes of SPP3.7.

Solar arrays are open, ground-mounted energy generation equipment and therefore, fail the structural and functional components of the SPP3.7 definition.

The BESS, substation and supporting electrical infrastructure are enclosed for equipment protection, not for human occupation; designed for remote and automated operation; and are accessed only intermittently for inspection and maintenance by authorised employees or personnel. While BESS containers may technically be enclosed structures with solid walls and roofs, they are not used for human occupation. They are not workplaces in the planning sense (i.e. not offices, workshops or industrial floorspaces designed for ongoing internal human activity). Their internal space houses electrical and battery systems only, and entry is limited to maintenance access.

All other supporting electrical and operational infrastructure in the proposal (refer to **section 3.1** above for further description) is not fully or partially enclosed and does not have a solid wall or roof of solid material.

Accordingly, all components in the proposal do not satisfy the third and critical limb of the habitable buildings definition, which is the use of the interior by people for living, working, studying or being entertained.

5.5.3.2 Renewable Energy Development and Bushfire Risk Assessment

SPP3.7 and the associated *Planning for Bushfire Guidelines* do not provide a suitable bushfire assessment framework for the assessment of renewable energy facilities in Bushfire Prone Areas.

The BAL framework is derived from Australian Standard 3959 Construction in Bushfire Prone Areas (**AS 3959**) and is fundamentally a building construction standard intended to improve the resilience of buildings occupied by people against bushfire attack (radiant heat, ember attack and flame contact). SPP3.7's BAL and BMP framework is designed for life safety in habitable development, and renewable energy facilities require a different, infrastructure-specific bushfire risk assessment methodology, typically based on radiant heat thresholds for asset protection and emergency management planning.

The Country Fire Authority (**CFA**) *Design Guidelines and Model Requirements for Renewable Energy Facilities Version 4* is the most appropriate framework for the assessment of renewable energy facility projects in Bushfire Prone Areas and have been applied to similar projects throughout Western Australia.

5.6 WAPC Position Statement: Renewable Energy Facilities

The key intent of the WAPC *Position Statement: Renewable Energy Facilities* (2020) is to support the consistent consideration and appropriate development of renewable energy facilities through the State and local planning frameworks. It provides direction on how renewable energy projects should be integrated into regional and local planning strategies, local planning schemes and development assessments, with the aim of facilitating industry growth while managing environmental, landscape and community impacts. The Position Statement supports the State Government's *State Energy Transformation Strategy* (March 2019), and it applies to both new renewable energy developments and the redevelopment of existing renewable energy facilities.

Relevant policy measures under Section 5.3 (Renewable energy facility proposals) of the Position Statement and the manner in which the proposal consider these matters are addressed in **Table 4**.

Table 4 – WAPC Position Statement Assessment

Policy Measure		Response	Achieved
5.3.1	Community consultation	Stakeholder engagement was undertaken prior to lodgement. Ongoing consultation will continue during the development application assessment, project implementation (construction and operational phases) to ensure continued community and stakeholder involvement.	✓
5.3.2	Environmental impact	No native vegetation clearing is proposed as part of this application, as the development footprint area only covers land already cleared and utilised for farming and agricultural cropping purposes. Refer to section 3.1.1 above.	✓
5.3.3	Visual and landscape impact	Due to the low-profile nature of the solar array, the generally flat topography and low-lying surrounding landform, together with sufficient location distance to nearby properties and dwellings, the proposed development is not anticipated to give rise to significant visual impacts or adversely affect landscape values. Refer to section 4.3.1 in this report and Appendix E .	✓
5.3.4	Noise impact	The proposed development has been subject to detailed acoustic assessment and has been determined to have no adverse impacts or amenity concerns on the surrounding sensitive receptors. Refer to section 4.2 above and Appendix D for further detail.	✓
5.3.5	Public and aviation safety	The proposed development layout has been informed by input from a suitably qualified bushfire consultant. The solar farm and BESS have been designed and will be maintained so that it does not pose a bushfire risk to surrounding bushland. Refer to section 5.5.3 and Appendix F . In terms of aviation safety, the Perenjori Aerodrome is located approximately 45 kilometres to the north-east, and there are no major commercial runway approach paths or aerodromes safeguarding constraints affecting the layout.	✓
5.3.6	Heritage	Refer to section 4.6 above for further detail. The proponent is aware of their obligations under the <i>Aboriginal Heritage Act 1972</i> and commenced engagement with the relevant ACH parties.	Underway
5.3.7	Construction impact	A Construction Management Plan will be prepared during detailed design to the satisfaction of the Shire and anticipated via a suitable condition of approval. The Construction Management Plan will outline construction management measures and mitigation to address potential impacts, as discussed in section 3.2.2 further above.	✓

In addition to the above, the Position Statement notes that: *Large facilities should be located close to the network grid and preferably on cleared rural land* (Section 5.2.1). The proposal is consistent with this guidance, being located on cleared rural land and next to an existing Western Power electrical terminal and overhead power lines.

As demonstrated above, the proposed development is consistent with the Position Statement and is therefore considered to merit support on this basis.

6.0 Conclusion

In summary, the proposal is considered appropriate on the following grounds:

- The proposed development appropriately addresses the relevant development standards and requirements of the applicable planning framework, including the Shire's *Local Planning Scheme No. 2* and relevant State Planning Policies and Guidelines.
- Extensive technical assessments and reporting has been undertaken to support the proposal's suitability from an acoustic, traffic, visual and landscape, and bushfire perspective, and confirm that the proposal will not detract from the amenity and safety of the immediate area and Three Springs locality.
- The subject site is not located near any residential or sensitive land uses and the proposed development will be low-impact in nature, with limited built form and visual impact, and negligible operational traffic once construction is complete. Its location, scale, and function are unlikely to generate any adverse off-site amenity or safety impacts.
- The proposal utilises a highly modified and previously cleared rural landscape for agricultural purposes, requiring no clearing of native vegetation and minimal shallow earthworks, thereby avoiding adverse environmental impacts.
- The subject site has been strategically selected having regard to its renewable energy potential, proximity to existing and planned power transmission infrastructure (including the future Three Springs Terminal as part of the State Government's Clean Energy Link – North project), and its direct adjacency to the existing Western Power substation and above-ground power lines with existing easements in place, enabling an efficient and logical grid connection outcome.

In light of the above, the proposal clearly demonstrates the suitability of the proposed use and development on the subject site.

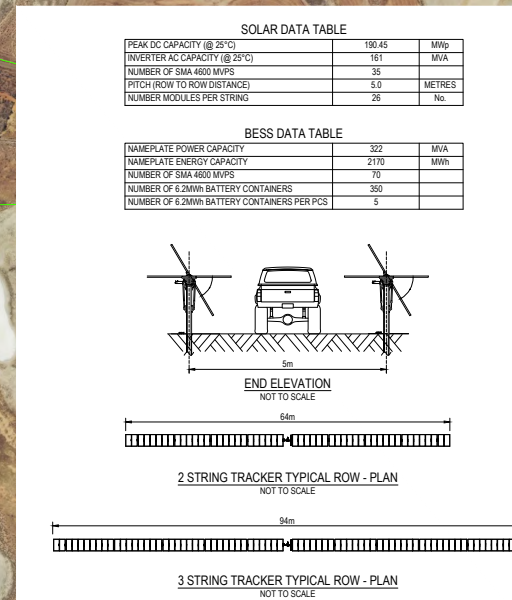
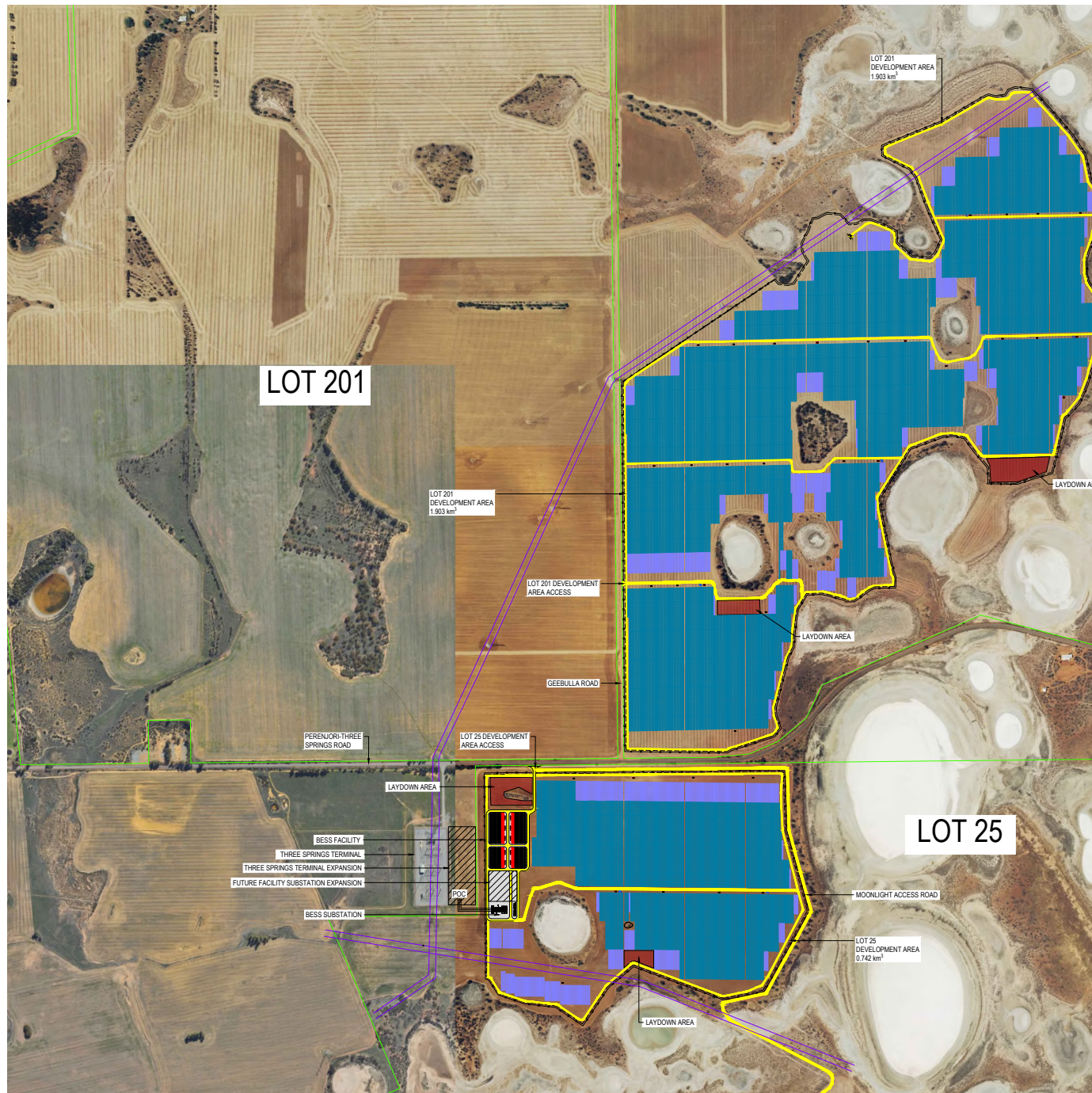
Based on the supportive information provided within this application and the accompanying reports, it is considered the proposed development warrants support by the Shire and Regional DAP and accordingly, we respectfully request the Regional DAP grant approval for the application.



Appendix B

DEVELOPMENT PLANS





LEGEND (SYMBOLS NOT DRAWN TO SCALE)

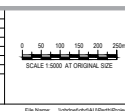
- LOT BOUNDARY
- SECURITY FENCE
- PROJECT DEVELOPMENT AREA
- INTERNAL ROAD ACCESS
- OVERHEAD TRANSMISSION LINE
- FUTURE EXPANSION
- 2 STRING TRACKER
- 3 STRING TRACKER
- POWER CONVERSION SYSTEM
- BATTERY CONTAINER
- METEOROLOGICAL STATION

GENERAL NOTES

- FINAL LAYOUT WILL BE SUBJECT TO FURTHER DESIGN INCLUDING BUT NOT LIMITED TO GEOTECHNICAL, HYDROLOGY, ENVIRONMENTAL AND CONSTRUCTABILITY INVESTIGATIONS.
- UTM84 -50S GIS COORDINATE SYSTEM HAS BEEN UTILIZED.
- THE SOLAR PV LAYOUT HAS BEEN DESIGNED WITH JA SOLAR JM72M42-650LB BIFACIAL MODULES AND SMA 4600 MWPS. THE LAYOUT MAY CHANGE IF DIFFERENT EQUIPMENT IS SELECTED.
- THE BESS LAYOUT HAS BEEN DESIGNED WITH 6.2 MWh BATTERY CONTAINERS AND SMA 4600 MWPS. THE LAYOUT MAY CHANGE IF DIFFERENT EQUIPMENT IS SELECTED.
- SOLAR STRING TRACKER DETAIL TO BE CONFIRMED BY THE OEM.
- THE NUMBER OF PILES ARE TO BE CONFIRMED AFTER THE GEOTECHNICAL AND WIND STUDIES ARE COMPLETED.
- THE CONFIGURATION OF THE INTERNAL ROAD LAYOUT IS CONTINGENT UPON THE FINDINGS OF THE FLOOD STUDY.
- SOLAR ARRAY CONFIGURATIONS SUBJECT TO OPTIMISATION.
- FUTURE SUBSTATION EXPANSIONS ARE NOT INCLUDED IN CURRENT DEVELOPMENT APPLICATION.
- THE SOLAR TRACKING SYSTEM IS SUITABLE FOR INSTALLATION ON NATURAL GROUND SLOPES TYPICALLY WITHOUT THE NEED FOR SITE REGRADING, LEVELLING OR BULK EARTHWORKS. TYPICALLY ONLY MINIMAL TO LIGHT CLEARING AND GRUBBING UNDER THE SOLAR TRACKERS AREA IS REQUIRED. FULL CLEARING TYPICALLY LIMITED TO ACCESS ROADS, SUBSTATION, PCS AND BESS FACILITY.
- BUSHFIRE SETBACK INPUTS PROVIDED BY CLIENT'S ADVISOR.

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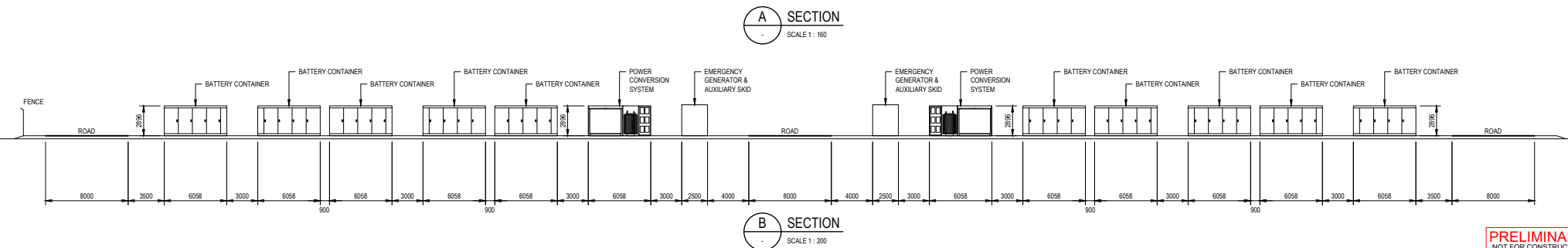
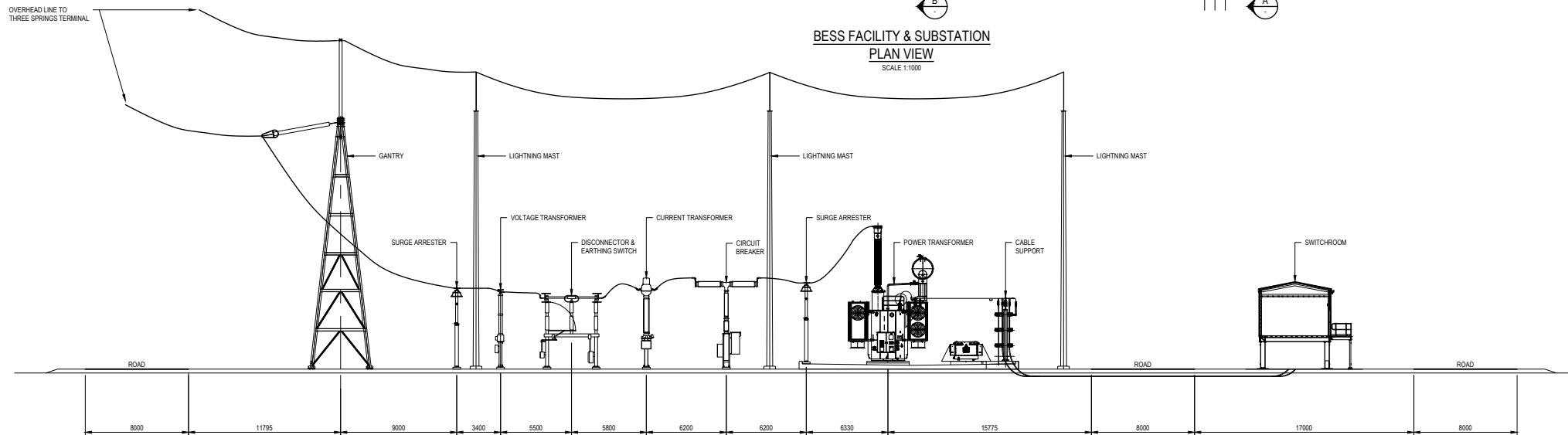
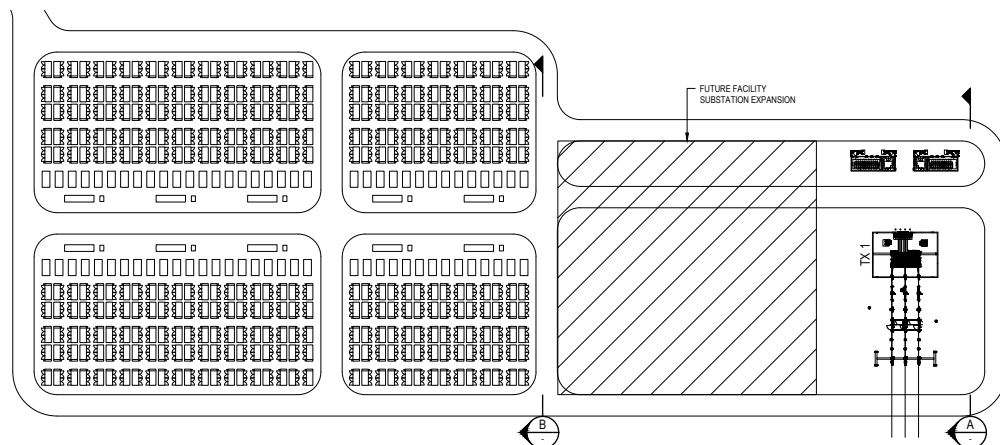


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Project: THREE SPRINGS GIGA ENERGY
Status: PRELIMINARY

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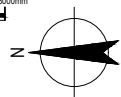
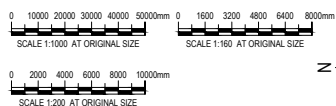


- GENERAL NOTES
1. ALL DIMENSIONS ARE IN MILLIMETRES (mm) UNLESS NOTED OTHERWISE.
 2. ALL DIMENSIONS ARE INDICATIVE FOR DEVELOPMENT APPLICATION PURPOSES ONLY.
 3. SUBSTATION LAYOUT IS INDICATIVE ONLY AND WILL BE CONFIRMED DURING DETAILED DESIGN.
 4. REFER TO 12668418-GHD-00-00-DRG-EL-00005 FOR PROJECT GENERAL ARRANGEMENT.



PRELIMINARY
NOT FOR CONSTRUCTION

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Client PROGRESSIVE GREEN SOLUTIONS
Project THREE SPRINGS GIGA ENERGY
Status PRELIMINARY

Drawing Title
THREE SPRINGS
GIGA ENERGY PROJECT
BESS AND SUBSTATION ELEVATION

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Appendix C

TRANSPORT IMPACT STATEMENT





Three Springs Solar Farm & BESS Facility Transport Impact Statement

PREPARED FOR:
Progressive Green Solutions

March 2026

Document history and status

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Client: Progressive Green Solutions

Project: Proposed Solar Farm & BESS Facility, Three Springs

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TABLE OF CONTENTS

1	INTRODUCTION.....	1
2	DEVELOPMENT PROPOSAL.....	3
3	VEHICLE ACCESS AND PARKING	4
3.1	ACCESS.....	4
3.2	PARKING	5
4	PROVISION FOR SERVICE VEHICLES	6
5	HOURS OF OPERATION.....	7
6	DAILY TRAFFIC VOLUMES AND VEHICLE TYPES	8
6.1	TRIP GENERATION	8
6.1.1	CONSTRUCTION STAGE TRAFFIC	8
6.1.2	OPERATIONAL STAGE TRAFFIC	9
6.2	TRIP DISTRIBUTION.....	9
6.3	IMPACT ON SURROUNDING ROADS.....	10
7	TRAFFIC MANAGEMENT ON FRONTAGE STREETS	11
7.1	EXISTING TRAFFIC VOLUME ON ROADS.....	12
7.2	HEAVY VEHICLES.....	12
7.2.1	TRANSPORT BY RAV VEHICLES.....	12
7.2.2	TRANSPORT BY OVERSIZE OVERMASS (OSOM) VEHICLES.....	14
7.3	CRASH DATA	18
8	PUBLIC TRANSPORT ACCESS	20
9	PEDESTRIAN & CYCLIST ACCESS	21
10	SITE SPECIFIC ISSUES.....	22
11	SAFETY ISSUES.....	23
12	CONCLUSIONS.....	24
	APPENDIX A	25
	APPENDIX B.....	27

REPORT FIGURES

Figure 1: Location of the subject site.....	1
Figure 2: Southern site access (Solar Farm and BESS)	4
Figure 3. Estimated traffic movements for the proposed development – AM peak/PM peak (Construction Stage).....	10
Figure 4: Southbound view along Midlands Road approaching townsite	11
Figure 6: Westbound view along Perenjori-Three Springs Road approaching townsite	12
Figure 7. Existing heavy vehicle road network classification (RAV) in subject locality	13
Figure 8. Existing heavy vehicle road network classification (RAV) in subject locality	13
Figure 8. Geraldton port to subject site OSOM route – Part 1	15
Figure 9. Geraldton port to subject site OSOM route – Part 2.....	15
Figure 10. Geraldton port to subject site OSOM route – Part 3	16
Figure 11. Fremantle port to subject site OSOM route – Part 1	16
Figure 12. Fremantle port to subject site OSOM route – Part 2.....	17
Figure 13. Fremantle port to subject site OSOM route – Part 3.....	17
Figure 14. Fremantle port to subject site OSOM route – Part 4.....	18
Figure 15. Simple right-turn and left-turn treatments (SR & SL) on a rural road - concept	22
Figure 16: SISD assessment of southern site crossover on Perenjori-Three Springs Road.....	23

REPORT TABLES

Table 1: Trip generation of the proposed development – construction stage.....	9
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1 Introduction

This Transport Impact Statement has been prepared by Transcore on behalf of Progressive Green Solutions (PGS) with regard to the proposed solar farm and battery energy storage system development (Three Springs Solar & BESS) to be located at Lot 201 (No. 3024) Perenjori-Three Springs Road and Lot 25 (No. 17112) Midlands Road in Womarden, Shire of Three Springs.

The proposed project spans two sites which are situated on either side of Perenjori-Three Springs Road. The northern site (Lot 201) occupies an area of approximately 2640ha while the southern site (Lot 25) occupies an area of approximately 3072ha.

The two sites are situated approximately 3.8km northeast of Three Springs townsite and about 3.4km east of the existing Three Springs-Morawa Road/Perenjori-Three Springs Road intersection. A Western Power sub-station is located immediately next to the southern site. Refer **Figure 1** for details.



Figure 1: Location of the subject site

The Transport Impact Assessment Guidelines (WAPC, Vol 4 – Individual Developments, August 2016) states: “A *Transport Impact Statement (TIS)* is required

for those developments that would be likely to generate moderate volumes of traffic¹ and therefore would have a moderate overall impact on the surrounding land uses and transport networks". **Section 6** of Transcore's report provides details of the estimated trip generation for the proposed development.

Accordingly, as the total peak hour vehicular trips are estimated to be less than 100 trips, a *Transport Impact Statement* is deemed appropriate for this development.

The subject sites are presently used for farming activities.

¹ *Between 10 and 100 vehicular trips*

2 Development Proposal

The proposed Three Springs Solar and BESS development comprises a 153MW solar farm with a 2 GWh BESS (battery energy storage system) across the two sites. The northern site will accommodate a solar farm only while the southern site will accommodate a solar farm with a BESS facility due to proximity to the existing Western Power substation.

The proposed solar farm and battery storage facility will be constructed in a defined development envelope of approximately 197ha (northern site) and 81ha (southern site) will comprise the following key components:

- Solar panel array;
- Substation with transformer block;
- PV inverter stations;
- Operation and maintenance facility;
- A switch room and control building;
- Battery Energy Storage System (BESS);
- Laydown areas; and,
- A system of unsealed access tracks.

Temporary laydown areas will be constructed on-site only for the duration of the construction phase of the project.

Access into the solar park/BESS site (southern site) will be facilitated via a single full-movement crossover on Perenjori-Three Springs Road, approximately 300m east of the existing Western Power Three Springs 330 kV terminal access point.

Access into the solar park site (northern site) is proposed via Geebulla Road which intersects with Perenjori-Three Springs Road at the western end of the site.

The Project will be built in one stage commencing in H1 2027 and is expected to be delivered over a period of approximately 12-14 months (construction stage), after which the two sites will be unmanned and require only occasional visits by technicians for inspection, maintenance and security purposes (operational stage).

Refer site plan attached in [Appendix A](#) for more details.

3 Vehicle Access and Parking

3.1 Access

The northern site is proposed to take access off Geebulla Road which intersections with Perenjori-Three Springs Road at the western end of the site. Geebulla Road is presently unsealed gravel road. This site will not require any staff during regular operation stage and only occasional inspection and maintenance works may be required; hence this road will not require upgrade to a sealed standard.

The southern site (i.e., solar farm/BESS site) will be served by a single full-movement crossovers on Perenjori-Three Springs Road, located at the western side of the site and approximately 300m east of the existing Western Power Three Springs 330 kV terminal access point.

This crossover will function as main vehicular access point connecting to the internal site's system of access roads. All regular employee and visitor traffic will use this access point. This crossover will also be used for the construction-related traffic during the construction stage of the project. Refer [Figure 2](#) for more details.



Figure 2: Southern site access (Solar Farm and BESS)

3.2 Parking

The proposed development provides for all parking requirements on-site in open-air car parking form.

All parking associated with the construction stage of the Project is intended to be provided on-site in form of informal unsealed parking areas due to convenience. The parking provision would initially cater for the construction and contractor workforce while in the subsequent operational stage parking will be formalised and designated to inspection and maintenance personnel.

4 Provision for Service Vehicles

During the construction stage all delivery of construction material, equipment and heavy machinery to the site and removal of the construction waste from the sites will typically be undertaken using heavy vehicles such as 19m semi-trailers, 27.5m B-Doubles and potentially 36.5m B-Triples in size. These vehicles would access and egress the two sites via the Perenjori-Three Springs Road (directly – southern site) and Geebulla Road (indirectly – northern site).

All heavy vehicle construction-related traffic will be arriving and departing sites principally from/to Geraldton town site direction (i.e., northwest of the site).

Preliminary advice from the applicant is that the equipment to be installed on site will likely be transported from Geraldton Port via major regional roads on 27.5m B-Double and potentially 36.5m B-Triple road trains, typically 1-2 per day.

Details relating to number and type of vehicles involved will be confirmed later in the project and those road trains and B-doubles may be subject to issuance of permits by Main Roads WA for Restricted Access Vehicle (RAV) movements on the road network. It is recommended that the permit requirement and transportation conditions be investigated in greater detail once all elements of the Project's transport task become known and available.

As advised by the proponent, a one-off shipment closer to facility commission would need to be organised (probably in convoy) in order to transport a transformer from the designated port to the site.

Once the construction stage is completed and the solar farm and BESS project is fully operational, service vehicles/heavy vehicles would only occasionally access the two sites if and when replacement material/equipment is required. Only a small number of vehicles is anticipated to access the two sites for inspection and maintenance purposes. These vehicles would rarely be larger than a typical utility or 4WD type of vehicle. These vehicles will continue to access and egress sites via Perenjori-Three Springs Road and Geebulla Road.

Regular waste collection during the operational stage of the project is not envisaged.

5 Hours of Operation

The construction activities are expected to be carried out in one shift seven days a week usually between 6:00AM and 7:00PM. The construction workforce will be arriving between 6:00-8:00AM and departing between 4:00-7:00PM.

The proposed solar farm and BESS facility will be unmanned and operating 24/7.

6 Daily Traffic Volumes and Vehicle Types

6.1 Trip Generation

The trip generation associated with this project can be separated into two discrete stages: construction stage and operational stage. The construction stage is the more traffic-intensive stage in this case while the operational stage will generate only moderate level of light vehicle traffic movements to and from the site.

It should be noted that the assessment is based on the full project build-out in one stage.

6.1.1 Construction Stage Traffic

Based on the advice provided to Transcore by the Applicant, it is anticipated that the construction of the proposed solar farm and BESS project will take up between 12-14 months starting from mid-2027. Number of on-site construction personnel is anticipated to vary during the construction period but is expected to reach around 220-330 people during the most intensive period of activity between both sites.

It is envisaged that most of the personnel would be bused to and from the workforce camp (location to be confirmed) while a small number of local workforce may be driving private vehicles to the site from local towns such as Eneabba, Three Springs, Carnamah, Morawa, Perenjori, Corrow and other. Additional light vehicles will be in use for support, delivery, inspection and other occasional maintenance activities, as required.

It is therefore estimated that a maximum of up to 96 daily trips, comprising passenger vehicles, 4WD, Utes and buses, would be generated by construction workforce and support staff on a typical working day. Assuming all employees arrive to the site in the morning and depart the site in the afternoon, it is conservatively assumed that the project will generate up to approximately 48 trips during the AM peak and 48 trips during the PM peak, on a typical working day during the most intensive part of the construction period. This should be regarded as an upper estimate of peak hour traffic generation as it is likely that not all personnel would start or end their day on site during the same hour and there would be some spreading of arrivals and departures over various hours of the day.

It is envisaged that most of the personnel would be bused to and from the workforce camp (location to be confirmed) while a small number of local workforces may be driving private vehicles to the site from local towns such as Eneabba, Three Springs, Carnamah, Morawa, Perenjori Corrow and other. Additional light vehicles will be in use for support, delivery, inspection and other occasional activities, as required.

In addition to the workforce-related traffic movements it is also estimated that on average two deliveries of construction material, equipment and heavy machinery would take place on an average workday. This would translate to four movements to and from the site on a typical working day. This type of traffic generally occurs outside of typical peak periods as is principally being driven by logistics/scheduling factors. However, for robustness it is assumed that up to two inbound trips during AM peak and two outbound trips during PM peak would be experienced on a typical day.

Accordingly, it is estimated that the proposed project would generate approximately 100 total daily (50 in and 50 out) trips with approximately 50 AM peak and 50 PM peak hour trips during the construction stage of the project on a typical weekday. Refer **Table 1** for more details.

The local workforce commuting by private vehicles is expected to use local routes and roads to access the site from various directions while workforce camp/material/ equipment-related traffic will arrive and depart the site via the major regional roads.

The workforce-related traffic will mostly comprise buses, private vehicles, utility vehicles, small vans. The delivery traffic will generally be undertaken using larger trucks. The maximum size vehicles anticipated to be used in transport and delivery of material/equipment are 19m semi-trailers, 27.5m B-Doubles and potentially 36.5m B-Triples.

Table 1: Trip generation of the proposed development – construction stage

Period	Direction	Workforce traffic		HV traffic		Total Traffic	
		Split	Total	Split	Total	Split	Total
Morning Peak	Inbound	46	48	2	2	48	50
	Outbound	2		0		2	
Afternoon Peak	Inbound	2	48	0	2	2	50
	Outbound	46		2		48	

6.1.2 Operational Stage Traffic

Once completed and fully operational, the proposed development (both sites) will not have any staff on site and will only require rare scheduled routine inspections and/or maintenance visits by technicians or security. These are anticipated to be once per week or less.

6.2 Trip Distribution

Considering the location of the subject site, available approach and departure routes to and from the site and local/regional trip generators, the anticipated directional trip distribution of the development-generated traffic is as follows:

- A total of 40% of traffic to/from the eastern direction along Perenjori-Three Springs Road; and,
- A total of 60% of traffic to/from the western direction along Perenjori-Three Springs Road and Three Springs-Morawa Road (and further Midlands Road, Three Springs-Eneabba Road).

Accordingly, the estimated directional distribution of development-generated trips for construction stage is illustrated in **Figure 3**. For simplicity, all trips are assumed to arrive to and depart from the southern site only.



Figure 3. Estimated traffic movements for the proposed development – AM peak/PM peak (Construction Stage)

6.3 Impact on Surrounding Roads

The WAPC Transport Impact Assessment Guidelines (2016) provides guidance on the assessment of traffic impacts:

“As a general guide, an increase in traffic of less than 10 per cent of capacity would not normally be likely to have a material impact on any particular section of road but increases over 10 per cent may. All sections of road with an increase greater than 10 per cent of capacity should therefore be included in the analysis. For ease of assessment, an increase of 100 vehicles per hour for any lane can be considered as equating to around 10 per cent of capacity. Therefore, any section of road where development traffic would increase flows by more than 100 vehicles per hour for any lane should be included in the analysis.”

As detailed in Section 6.1, the proposed development will not increase traffic on any local road anywhere near the 100vph (per lane) threshold, therefore it is concluded that the impact of the development traffic on the surrounding road network will not be significant.

7 Traffic Management on Frontage Streets

Midlands Road in the vicinity of the subject site is a single carriageway road with 6.2m wide trafficable lanes and wide gravel shoulders. In the vicinity of the Three Springs townsite, the road is generally flat and entails a relatively straight alignment (refer **Figure 4**).

Midlands Road operates under a speed limit of 110km/h outside of built-up areas with reduced speed limit to 50km/h on approach to Three Springs town. Midlands Road is a *State Road*, classified as a *Primary Distributor* road in the Main Roads WA functional road hierarchy.



Figure 4: Southbound view along Midlands Road approaching townsite

Perenjori-Three Springs Road, in the vicinity of the subject site is a single carriageway road with 6.2m wide trafficable lanes and wide gravel shoulders. In the vicinity of the site, the road is generally flat and entails a gentle bend east of the site.

Perenjori-Three Springs Road is classified as a *Local Distributor* (east of Three Springs-Morawa Road) and *Regional Distributor* (west of Three Springs-Morawa Road), in the Main Roads WA *Functional Road Hierarchy* and operates under the speed limit regime of 110km/h reducing to 80km/h on the approach to Three Springs townsite (refer **Figure 6**).



Figure 5: Westbound view along Perenjori-Three Springs Road approaching townsite

7.1 Existing Traffic Volume on Roads

Traffic count data obtained from Main Roads WA indicates that Midlands Road carried average weekday traffic flows of 324 vehicles per day (vpd), north of Arrino South Road (approximately 14km north of Three Springs), in 2023/24.

Heavy vehicles comprised approximately 32.4% of the total traffic mix.

Traffic count data obtained from Main Roads WA indicates that Perenjori-Three Springs Road carried average weekday traffic flows of 1,231 vehicles per day (vpd), west of the subject site in 2025/26.

Heavy vehicles comprised approximately 43.6% of the total traffic mix.

7.2 Heavy Vehicles

7.2.1 Transport by RAV Vehicles

Restricted Access Vehicle (RAV) Network routes are routes/roads designated for access by large heavy vehicle combinations, which is managed by Main Roads WA.

According to Main Roads WA HVS department RAV network map, the subject sites are accessible by roads classified up to RAV Network 7 via Midlands Road/Franklin Road/Telegraph Road/Three Springs-Morawa Road/Perenjori-Three Springs Road routes and further from/to the northwest direction and via Perenjori-Three Springs Road from the eastern direction (refer [Figure 7](#) for details). The RAV 7 Network

classification permits operation of heavy vehicle compositions potentially of up to 36.5m in length (i.e., B-Triples).



Figure 6. Existing heavy vehicle road network classification (RAV) in subject locality

As can be seen from Figure 8, with both Three Springs-Morawa Road and Perenjori-Three Springs Road being classified as RAV 6 and 7 Network roads the movement of 36.5m B-Triples through this intersection is formally permitted.



Figure 7. Existing heavy vehicle road network classification (RAV) in subject locality

However, the maximum permitted mass of vehicles is limited to 88.5t and 108.5t for RAV 6 and RAV 7 classes, respectively. Accordingly, any construction and operation-related movements of heavy vehicles would need to be carefully planned to account for heavy vehicle type and payload mass limitations associated with RAV 6 and RAV 7 roads.

7.2.2 Transport by Oversize Overmass (OSOM) Vehicles

According to the advice provided by the proponent, a one-off Oversize Overmass (OSOM) transportation would need to occur to facilitate transport of a transformer from the port to the subject site for its installation at the battery storage facility.

The MRWA's regional office requested that additional information such as transport route map and vehicle size for this specific transport task be included in reports for these types of developments. However, details relating to port of delivery, payload dimensions/weight and type of vehicle required to facilitate this transport task are not yet known/confirmed at this early stage of the project.

Nevertheless, for the purpose of this exercise and to address the request by MRWA, Transcore has sourced information relating to potential type/size/weight of the transformer from another similar project. Accordingly, for the purpose of the transport task investigation the following payload assumptions were adopted:

- Dimension of the payload: 9400mm x 3400mm x 4200mm (L x W x L);
- Weight of the payload: 160 tonnes;

Transcore has liaised directly with MRWA's Heavy Vehicle Services in order to investigate the potential/likely route(s) for the transport task, type of vehicle required, road network constraints, permits and other relevant factors. As such, the approach is a collaborative effort to establish the framework of the pending transport task.

As advised by MRWA HVS, this specific equipment will require use of a platform trailer long enough to be able to distribute the payload weight across axles so to ensure that axle load remains within permitted ranges. The route assessment will need to consider DOS (Driving Over Structures) factor which defines maximum load a road/structure can sustain.

Assuming a trailer height of 1200mm, the total vehicle + payload height would add up to 5400mm. Accordingly, in order to ensure that a selected OSOM vehicle transporting this specific payload can pass under various structures along the designated route (i.e., bridges, underpasses, overhead power lines, etc.) additional 300mm clearance needs to be allowed for, hence, the minimum height clearance along the route would equate 5700mm. The route assessment will need to consider DUS (Driving Under Structures) factor which defines maximum clearances along the designated route.

The route assessment will also need to account for clearances under overhead wires through liaison with Western Power/Horizon.

Applying the stated payload and vehicle assumptions, along with discussions with MRWA's Heavy Vehicle Services, the two most suitable potential routes to the subject site from Geraldton and Fremantle ports were identified as follows:

From Geraldton port:

John Willcock Link → Brand Highway → Midlands Road → Glyde Street → Three Springs-Morawa Road → Perenjori-Three Springs Road (refer **Figure 8** to **Figure 10**).

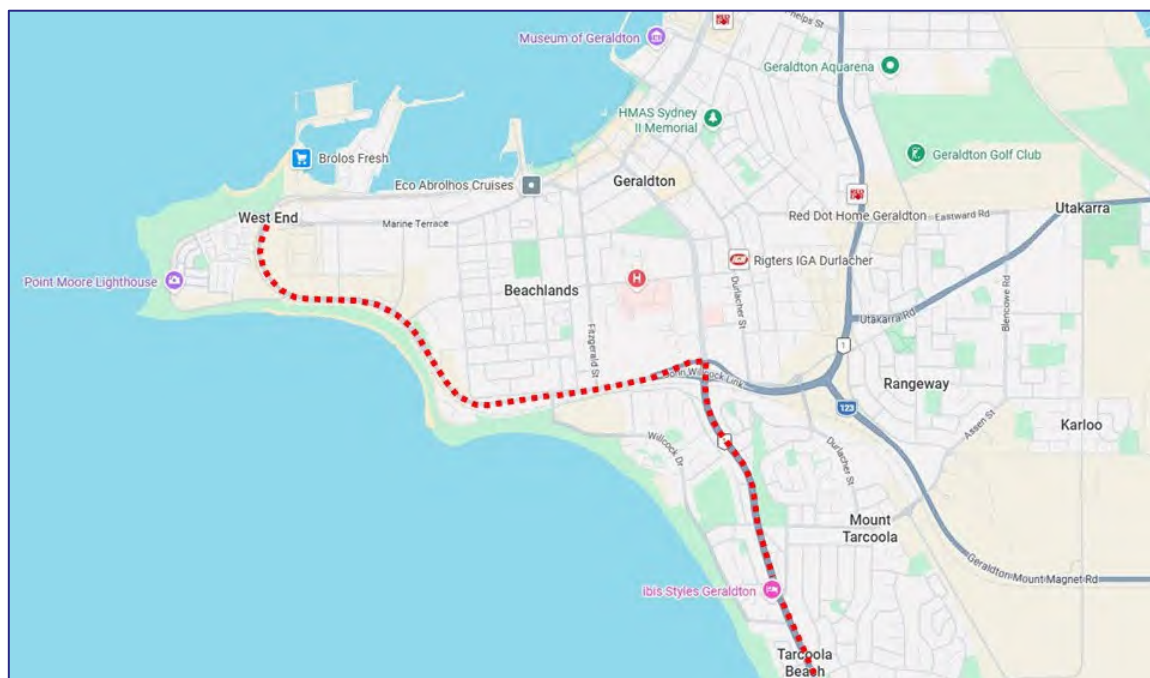


Figure 8. Geraldton port to subject site OSOM route – Part 1

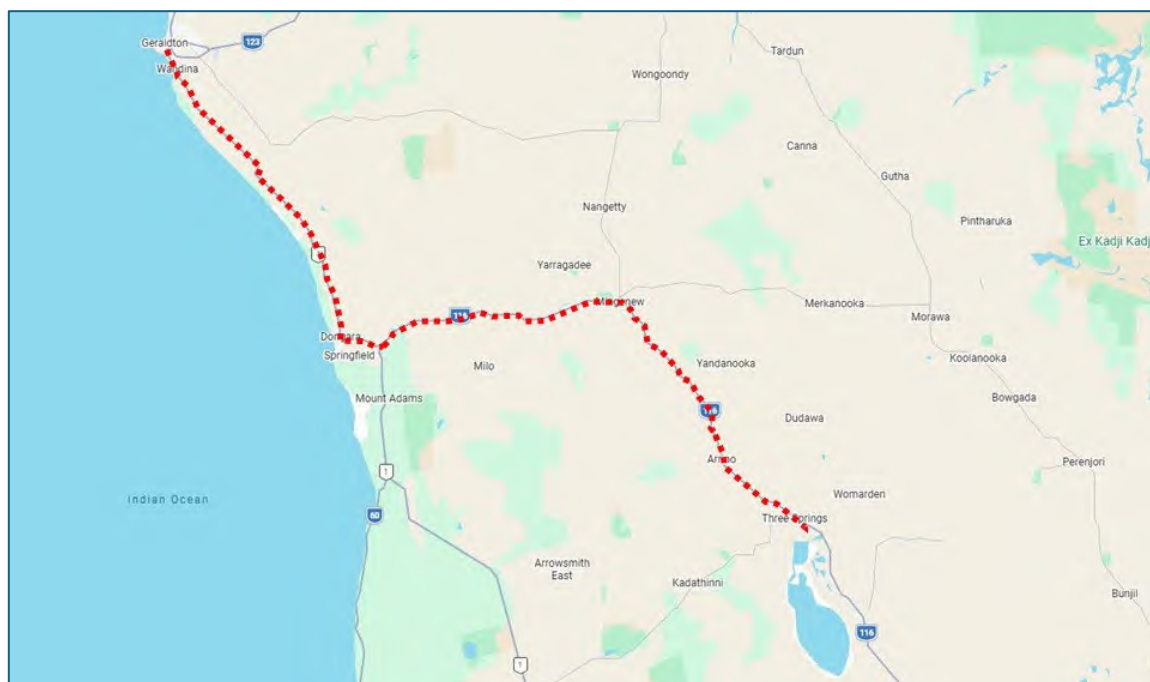


Figure 9. Geraldton port to subject site OSOM route – Part 2



Figure 10. Geraldton port to subject site OSOM route – Part 3

From Fremantle port:

Tydemans Road → Stirling Highway → High Street → Leach Highway → Stock Road → South Street → Roe Highway → Great Northern Highway → Brand Highway → Three Springs-Eneabba Road → Thomas Street → Midlands Road → Glyde Street → Three Springs Road-Morawa Road → Perenjori-Three Springs Road (refer Figure 11 to Figure 14).

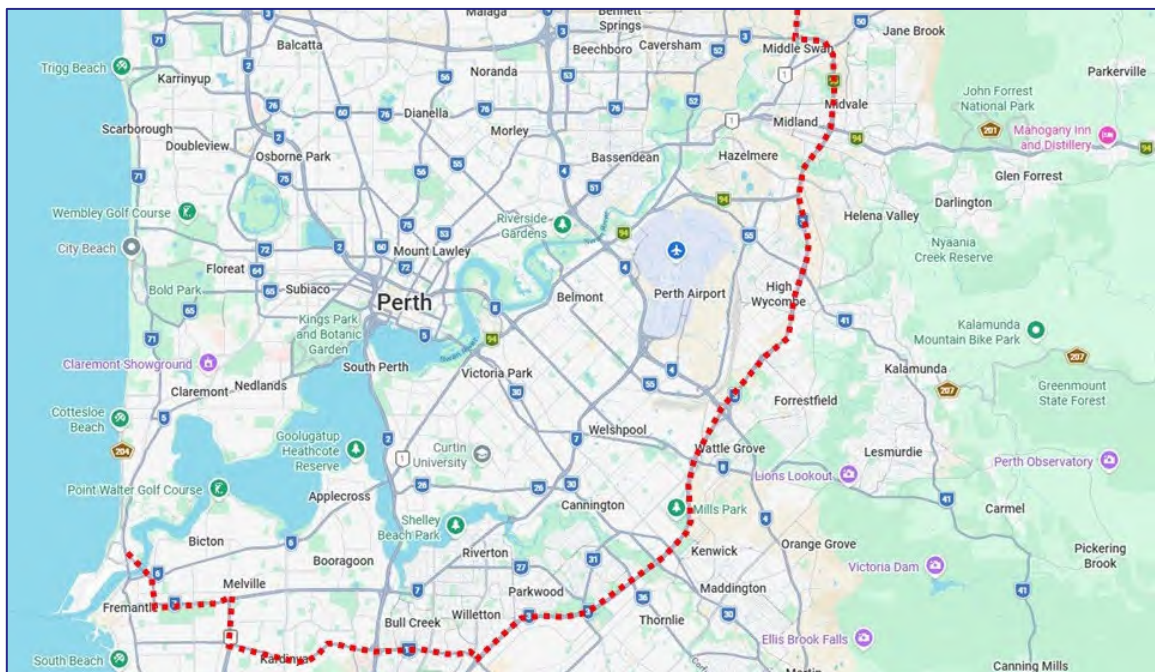


Figure 11. Fremantle port to subject site OSOM route – Part 1

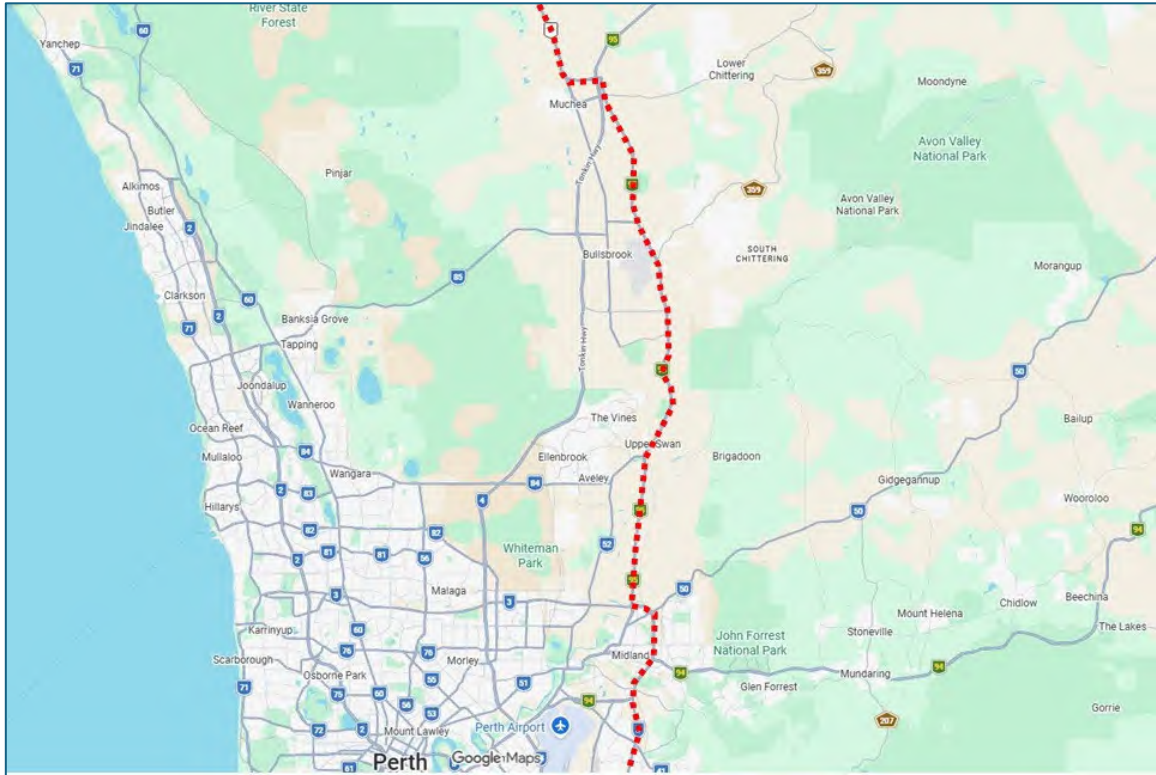


Figure 12. Fremantle port to subject site OSOM route – Part 2

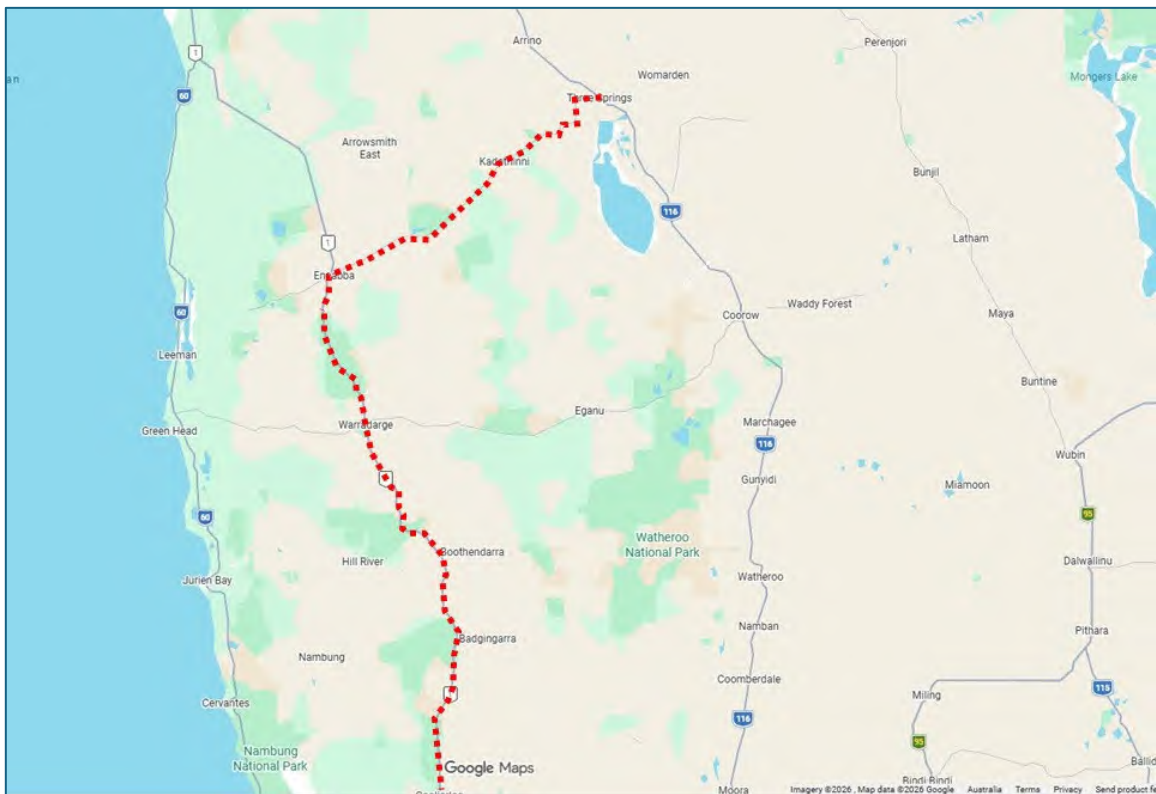


Figure 13. Fremantle port to subject site OSOM route – Part 3



Figure 14. Fremantle port to subject site OSOM route – Part 4

Either of the two identified transport routes would require crossing of the railway line in Three Springs townsite. This would require coordination with the responsible railway operator.

It is likely that the OSOM transport would require one pilot and potentially one envoy vehicle, but this would be determined once the vehicle and the load details are confirmed.

If, as part of the project scope, more than one transformer is required and needs to be transported to the site such transport may be organised via a convoy arrangement.

Finally, MRWA HVS advised that once all relevant details of the transport task become available the proponent would need to engage a licenced transport operator to undertake the final road survey using *HVS Network Map tool* and propose the preferred transport route(s) in a tailored Transport Management Plan for MRWA HVS's review and approval. The Transport Management Plan is typically assessed by MRWA's HVS within a 72-hour timeframe unless the route is a more challenging one.

7.3 Crash Data

Main Roads WA Intersection *Crash Ranking Report* provides detailed crash data for all WA roads and intersections over the 5-year period ending 31 December 2024.

Based on this crash information portal, no crashes were recorded on Perenjori-Three Springs Road and Three Springs-Morawa Road in the immediate proximity to the site, in the designated 5-year period.

8 Public Transport Access

Due to the type and location of the proposed development the availability of public transport services is not considered relevant.

9 Pedestrian & Cyclist Access

Due to the type and location of the proposed development the availability of pedestrian and bicycle access is not considered relevant.

10 Site Specific Issues

The AUSTROADS “*Guide to Road Design – Part 4a: Unsignalised and Signalised Intersections (2023)*” and associated Main Roads WA “*Supplement to AUSTROADS Guide to Road Design – Part 4a (July 2025)*” documents were referenced to ascertain the requirements for auxiliary turn treatments at the future southern site access crossover on Perenjori-Three Springs Road.

Accordingly, Transcore’s analysis and review of turn treatment warrants and analysis undertaken using the calculation tool provided by Main Roads WA confirmed that provision of auxiliary right-turn treatment at this intersection is not warranted with analysis resulting in Simple Right-turn (SR) and Simple Left-turn (SL) outcomes. Illustrations of SL type of treatments on rural roads are shown in **Figure 15** (also attached in **Appendix B**).

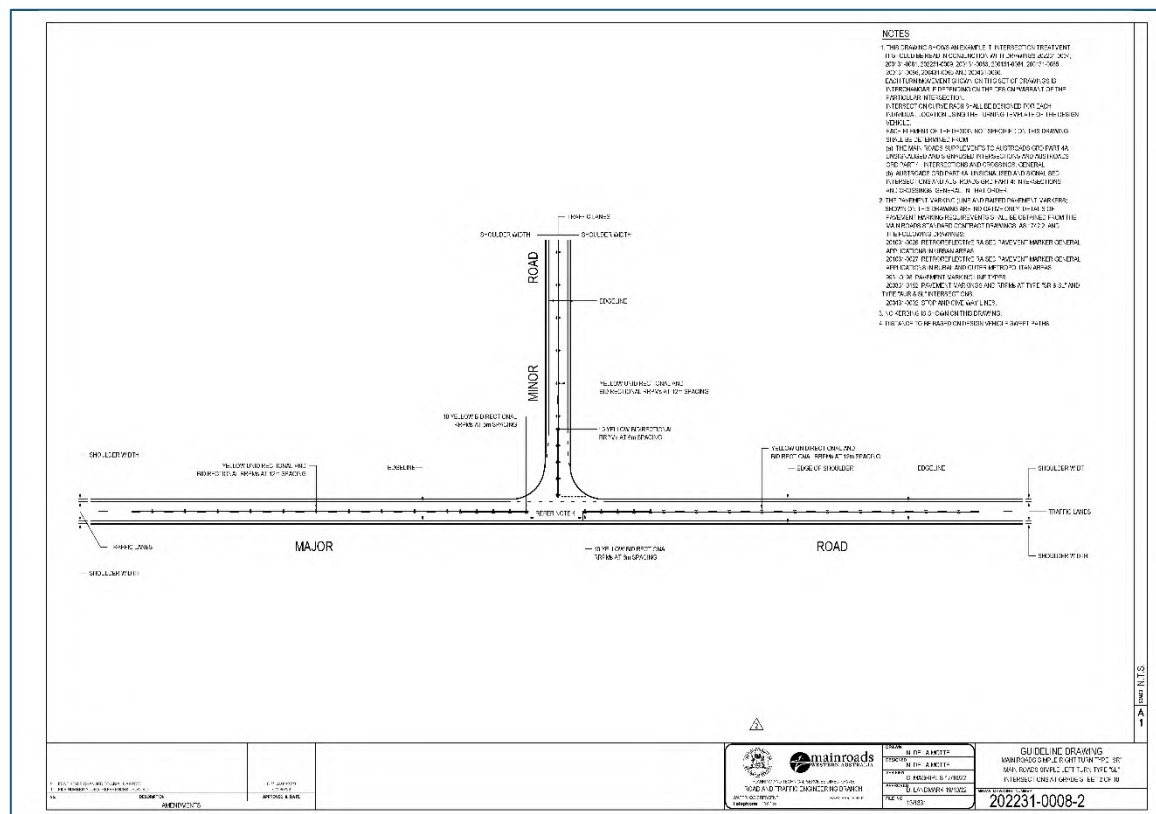


Figure 15. Simple right-turn and left-turn treatments (SR & SL) on a rural road - concept

11 Safety Issues

A desktop sightline assessment of the proposed southern site crossover on Perenjori-Three Springs Road has confirmed that the sightlines will likely be adequate at this location.

In accordance with and Main Roads WA *“Supplement to AUSTROADS Guide to Road Design – Part 4a (July 2025)”*, for a sign-posted speed limit of 110km/h and using 2.0s reaction time factor, the available sightlines along Perenjori-Three Springs Road should be 324m in both directions.

Based on desktop assessment undertaken on aerial imagery, it is estimated that the required sightlines in both directions can be achieved with no need for vegetation clearing along the road in both east and west direction as indicated in **Figure 16**.



Figure 16: SISD assessment of southern site crossover on Perenjori-Three Springs Road

12 Conclusions

This Transport Impact Statement has been prepared by Transcore on behalf of Progressive Green Solutions (PGS) with regard to the proposed solar farm and battery energy storage system development to be located at Lot 201 (No. 3024) Perenjori-Three Springs Road and Lot 25 (No. 17112) Midlands Road in Womarden, Shire of Three Springs.

The proposed Three Springs Solar and BESS development comprises a 153MW solar farm with a 2 GWh BESS (battery energy storage system) across the two sites. The northern site will accommodate a solar farm only while the southern site will accommodate a solar farm with a BESS facility due to proximity to the existing Western Power substation.

Access into the solar park/BESS site (southern site) will be facilitated via a single full-movement crossover on Perenjori-Three Springs Road while access into the solar park site (northern site) is proposed via Geebulla Road, which intersects with Perenjori-Three Springs Road at the western end of the site.

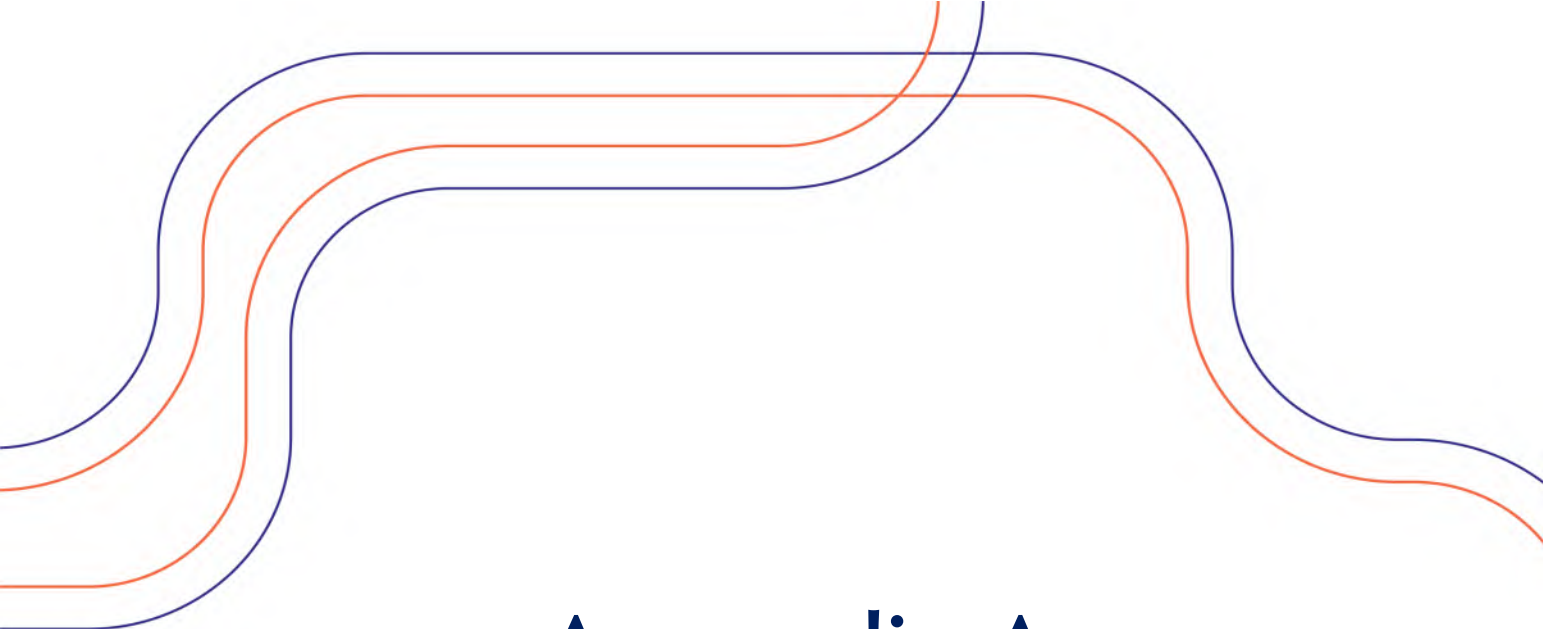
The traffic analysis undertaken and presented in this report shows that the highest level of traffic demand on the local road network will occur, during the 14-month construction stage of the project, is conservatively estimated to be in order of up to 100 daily and 50 peak hour trips during AM/PM peak (total of inbound plus outbound trips). The traffic mix during this stage includes light and heavy vehicles involved in the installation of the solar farm and battery storage.

Once constructed, the two sites will be unmanned and require only occasional visits by technicians for inspection, maintenance and security purposes (operational stage).

The access crossover to the southern site should be constructed so to include Simple Left-turn and Right-turn (SL & SR) type of intersection treatments.

As such it is concluded that the traffic impact of the development on the surrounding road network will not be significant and is well within its capacity.

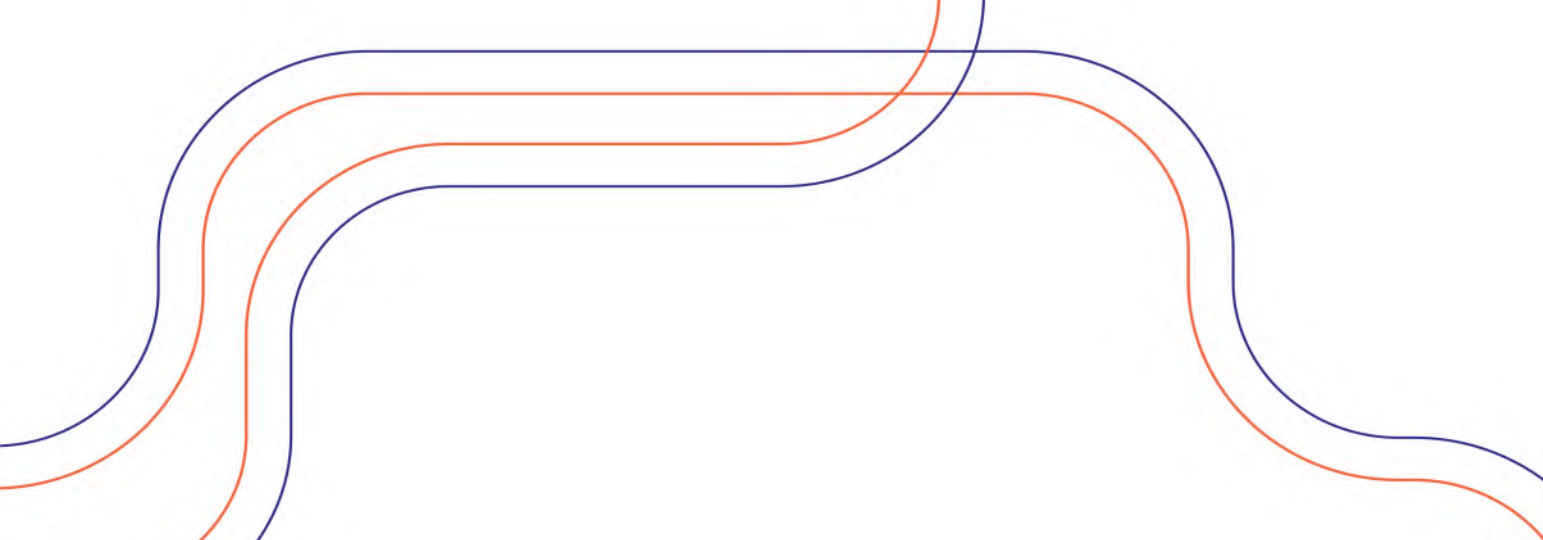
Hence, it is concluded that traffic-related issues should not form an impediment to the approval of the proposed solar farm and battery energy storage system project.



Appendix A

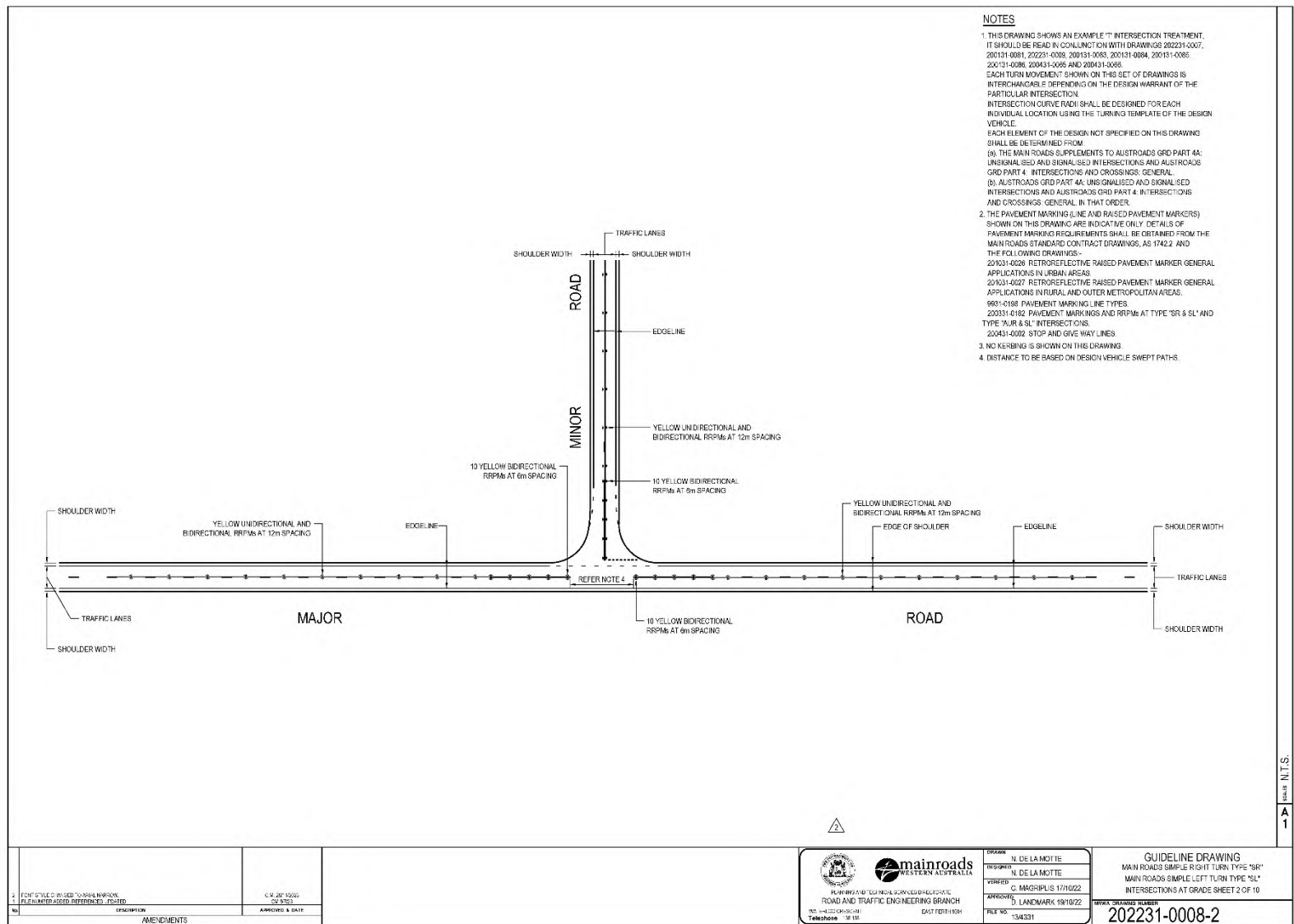
PROPOSED DEVELOPMENT PLAN





Appendix B

TURN TREATMENTS ON RURAL ROADS





Appendix D

ACOUSTIC REPORT



TBB PLANNING

THREE SPRINGS SOLAR FARM PROJECT

PRELIMINARY ENVIRONMENTAL NOISE ASSESSMENT

MARCH 2026

OUR REFERENCE: 36084-2-26062

DOCUMENT CONTROL PAGE

ENVIRONMENTAL NOISE ASSESSMENT THREE SPRINGS SOLAR FARM PROJECT

Job No: 26062

Document Reference: 36084-2-26062

FOR

TBB PLANNING

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This report has been prepared in accordance with the scope of services and on the basis of information and documents provided to Herring Storer Acoustics by the client. To the extent that this report relies on data and measurements taken at or under the times and conditions specified within the report and any findings, conclusions or recommendations only apply to those circumstances and no greater reliance should be assumed. The client acknowledges and agrees that the reports or presentations are provided by Herring Storer Acoustics to assist the client to conduct its own independent assessment.

EXECUTIVE SUMMARY

Herring Storer Acoustics were commissioned through TBB Planning to carry out an acoustic study of noise emissions for the proposed Three Springs Solar Farm project.

The proposed project includes a solar farm, associated inverters and a BESS (batteries and inverters). A substation is also proposed as a part of the project.

This acoustic assessment is required for the approval process and is being undertaken prior to the final design of the project being known. Detailed design of the equipment proposed to be utilised will be undertaken as part of the design development process once development approval is attained.

The nearest noise sensitive premises "R1" is situated approximately 2900m to the west of the BESS associated with the project, and "R2" approximately 2000m North-West of the solar array.

Modelling was conducted with assumed noise levels, based on previous similar projects.

For the most stringent time period (night) the assigned noise level at the surrounds would be 35 dB(A). The highest predicted noise emissions for the nearest noise sensitive premise is 27 dB(A). The assessable noise level, on the assumption that tonal characteristics may be present, is 32 dB(A) – complying with the most stringent criteria.

The acoustic assessment shows that in the worst case, that noise received at surrounding premises is below the Assigned Noise Levels stipulated by the Regulations. Thus, noise emissions from the proposed Solar Farm would be deemed to comply with the requirements of the Regulations.

CONTENTS

1.	INTRODUCTION	1
2.	ACOUSTIC CRITERIA	2
3.	MONITORED AMBIENT NOISE	3
4.	METHODOLOGY	5
5.	RESULTS	6
6.	ASSESSMENT	6

APPENDICES

A	PRELIMINARY LAYOUT PLAN
B	NOISE CONTOUR PLOT
C	MONITORED DATA

1. INTRODUCTION

Herring Storer Acoustics were commissioned through TBB Planning to carry out an acoustic study of noise emissions for the proposed Three Springs Solar Farm project, with the locality as shown in Figure 1.1 below.

The project consists of a solar array and BESS facility. The noise sources considered in our preliminary assessment consist of the following:

- 252 batteries (and associated inverters)
- Solar Farm (primarily the inverters associated with the solar farm)
- Sub-station

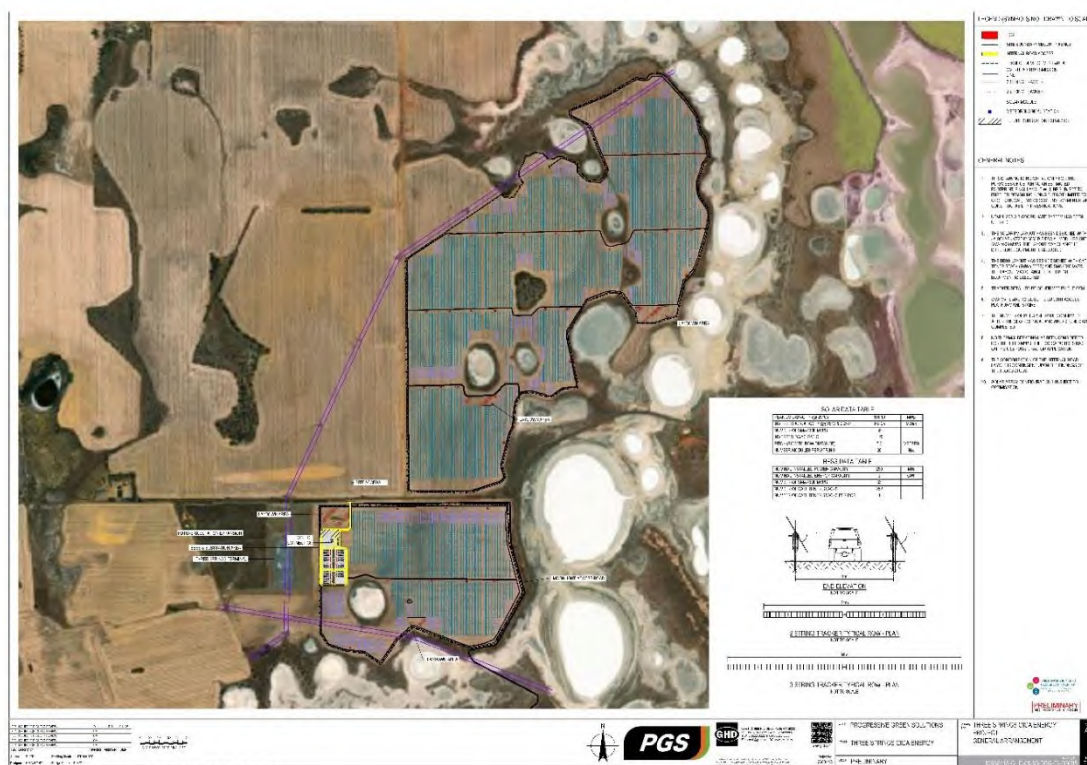


FIGURE 1.1 – SITE LAYOUT

The nearest noise sensitive premises have been identified as shown below in Figure 2.1, with the nearest noise sensitive premises being 2.9kms to the west (from the BESS) and approximately 2km north-west from the solar array.

This report assesses night-time (worst case) noise emissions under maximum propagation conditions for the proposed development, based upon assumed noise levels for compliance with the requirements of the Western Australian *Environmental Protection (Noise) Regulations 1997 (WA) (the Noise Regulations)*.

This work has been undertaken to accompany the development application for the project to ascertain if the project can comply with the Regulations. It is considered likely that a detailed assessment will need to be undertaken during the design development phase of the project in response to expected development approval conditions – at which time, equipment selections and the like would have been undertaken with specified noise data able to be included in the modelled levels.

2. ACOUSTIC CRITERIA

The criteria used is in accordance with the *Environmental Protection (Noise) Regulations 1997*. These regulations stipulate maximum allowable external noise levels that can be received at one premises from another premises. For the highly sensitive area of a noise sensitive premises the allowable noise levels are determined by the calculation of an influencing factor. The influencing factor is calculated for the usage of land within the two circles, having radii of 100m and 450m from the premises of concern. For other premises (i.e. commercial and industrial premises), including other areas of a noise sensitive premises, the allowable noise levels are fixed. Table 2.1 lists the baseline assigned noise levels for highly sensitive areas of a noise sensitive premises and the allowable noise levels for other premises.

TABLE 2.1 – ASSIGNED OUTDOOR NOISE LEVELS

Type of premises receiving noise	Time of day	Assigned level (dB)		
		L _A 10	L _A 1	L _A max
Noise sensitive premises: highly sensitive area (i.e within 15m of a dwelling)	0700 to 1900 hours Monday to Saturday	45 + IF	55 + IF	65 + IF
	0900 to 1900 hours Sunday and public holidays	40 + IF	50 + IF	65 + IF
	1900 to 2200 hours all days	40 + IF	50 + IF	55 + IF
	2200 hours on any day to 0700 hours Monday to Saturday and 0900 hours Sunday and public holidays	35 + IF	45 + IF	55 + IF

Note: The L_{A10} noise level is the noise that is exceeded for 10% of the time.
The L_{A1} noise level is the noise that is exceeded for 1% of the time.
The L_{Amax} noise level is the maximum noise level recorded.
IF = Influencing Factor

It is a requirement that noise from the site be free of annoying characteristics (tonality, modulation and impulsiveness) at other premises, defined below as per Regulation 9.

Where the above characteristics are present and cannot be practicably removed, the following adjustments are made to the measured or predicted level at other premises.

TABLE 2.2 – ADJUSTMENTS FOR ANNOYING CHARACTERISTICS WHEN MUSIC IS NOT PRESENT

Where tonality is present	Where modulation is present	Where impulsiveness is present
+ 5 dB	+ 5 dB	+ 10 dB

The key receptors have been identified, as shown below, with the locations shown on Figure 2.1. This provides the closest in terms of distance to the project, which are the most stringent assigned noise level.

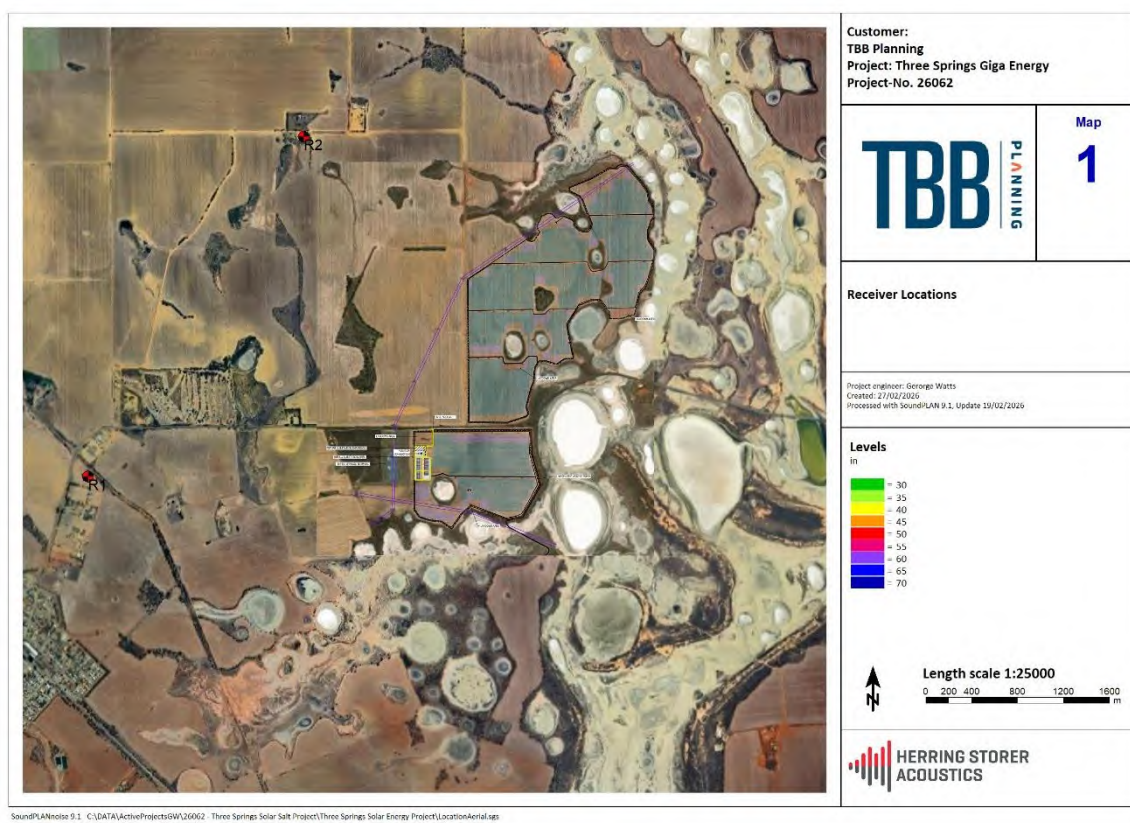


FIGURE 2.1 – RESIDENTIAL RECEIVER LOCATION MAP

3. MONITORED AMBIENT NOISE

As per the “Draft Guidelines on Environmental Noise for Prescribed Premises” (released in May 2016), continuous noise monitoring has been conducted for this site, to establish the ambient noise levels.

The noise monitoring location is shown in Figure 3.1 below.

Continuous noise monitoring was conducted from the 13th February through to the 19th February 2026. During this period, weather conditions were monitored via the Bureau of Meteorology web site as to any weather conditions which may have unduly influenced noise levels.

Figure 3.1 details the locations of the monitors, with Figure 3.2 showing the monitors in situ.



FIGURE 3.1 - CONTINUOUS MONITORING LOCATION

Noise monitoring results are summarised graphically below in Figure 3.3.

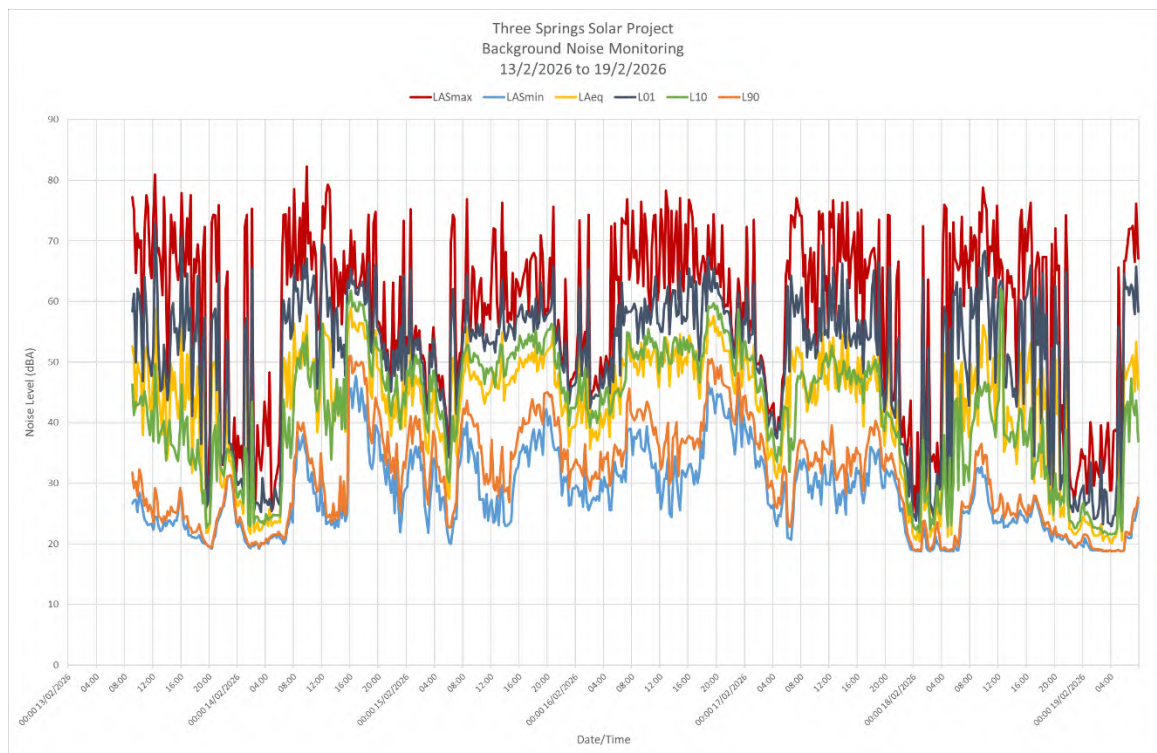


FIGURE 3.3 – MONITORED NOISE LEVELS – PROPOSED THREE SPRINGS SOLAR SITE

For informational purposes, a summary of the average noise level for each daily regulatory time period is shown in Table 3.1.

TABLE 3.1 – SUMMARY NOISE LEVELS

Day / Date	Background Noise Level Monitor		
	Day 0700 to 1900	Evening 1900 to 2200	Night 2200 to 0700
Friday, 13 February 2026	27	23	25
Saturday, 14 February 2026	43	40	37
Sunday, 15 February 2026	38	43	33
Monday, 16 February 2026	41	48	39
Tuesday, 17 February 2026	36	33	22
Wednesday, 18 February 2026	29	22	20
Average (Good Days)	36	35	29

4. METHODOLOGY

Noise immissions¹ at the nearest neighbouring residential premises, due to noise associated with the proposed operations, were modelled using the computer programme SoundPlan. Sound power levels used for the noise modelling were based on assumed noise levels for previous similar projects.

This acoustic assessment is required for the approval process and is being undertaken prior to the final design of the project being known. Selections of batteries, inverters and the like will need to be confirmed during the detailed design process to confirm noise modelling. This preliminary assessment considers the noise impact in a conservative fashion (i.e. overestimating noise levels).

The design configuration for the proposed project is contained in Appendix A. The sound power levels for individual equipment as shown in Table 4.1.

TABLE 4.1 – SOUND POWER LEVEL - NOISE SOURCES dB(A)

Noise Sources	Sound Power Level dB(A)
Batteries (252 of)	85
Inverters (both solar and battery)	88
Substation	98

Based on the assumed noise emissions from the above equipment, a preliminary noise impact to the surrounding area was modelled.

It is noted, that all equipment has been assumed to be operating at the same time, at 100%. It is understood that the noise emissions associated with batteries typically vary with temperature, hence, for the most stringent time period defined by the Regulations, this is likely to be conservative.

Weather conditions for modelling were as stipulated in the Environmental Protection Authority's *"Draft Guidance for Assessment of Environmental Factors No. 8 - Environmental Noise"* as listed in Table 4.2.

¹ Immissions – noise received at a source

² Emissions – noise emanating from a source and / or location

TABLE 4.2 – WEATHER CONDITIONS

Condition	Night	Day
Temperature	15°C	20°C
Relative humidity	50%	50%
Pasquill Stability Class	F	E
Wind speed	3 m/s*	4 m/s*

* From sources, towards receivers.

It is noted that 'worst case' wind conditions refer to conditions where there is a temperature inversion in conjunction with light winds in the direction from noise source to receiver, resulting in the highest sound propagation towards receiver locations.

5. RESULTS

A summary of the calculated noise levels for scenarios are shown in Table 5.1.

TABLE 5.1 – CALCULATED NOISE LEVELS, L_{A10} dB(A)

Receiver Name	Calculated Noise Level
R1	26
R2	27

Noise contour plots for the above scenarios are included in Appendix B.

6. ASSESSMENT

On the basis of the assumed noise levels, noise levels at the nearest noise sensitive premises have been calculated at up to 30 dB(A).

Given the background noise levels measured in the area, and the noise sources involved in the project, the noise emissions could contain tonal characteristics, hence, a + 5 dB adjustment to the calculated noise levels may be applicable.

Based on this, Table 6.1 contain the applicable adjustments, and assessable noise levels.

TABLE 6.1 – APPLICABLE ADJUSTMENTS AND ASSESSABLE LEVEL OF NOISE EMISSIONS, L_{A10} dB(A)

Noise Measurement Location	Calculated Noise Level L _{A10}	Applicable Adjustments to Measured Noise Levels, Characteristics			Assessable Noise Level
		Where Noise Emission is NOT music			
		Tonality	Modulation	Impulsiveness	
R1	26	+ 5	-	-	31
R2	27	+5	-	-	32

Hence, based on the most stringent time period – namely the night period -Table 6.1 assesses the noise impact of the proposed development.

TABLE 6.2 – ASSESSMENT OF NOISE LEVELS

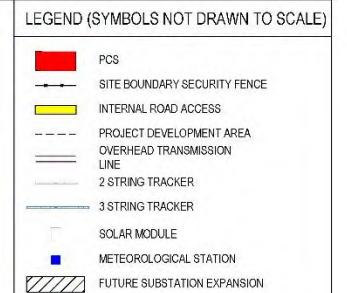
Receiver	Assessable Noise Level, dB(A)	Applicable Times of Day	Applicable L _{A10} Assigned Noise Level (dB)	Exceedance to Assigned Noise Level L _{A10} (dB)
R1	31	Night (22:00 to 07:00)	35	Complies
R2	32			Complies

For the most stringent time period (night) the assigned noise level is 35 dB(A). The highest predicted noise emissions for the nearest noise sensitive premise was 32 dB(A) at “R2”. This includes all proposed plant associated with the project operating at 100%.

The acoustic assessment shows that in the worst case, that noise received at a premise is below the assigned noise level. Thus, noise emissions from the proposed Three Springs Solar Farm would be deemed to comply with the requirements of the Regulations.

APPENDIX A

PRELIMINARY LAYOUT PLAN



1. THIS DRAWING IS INDICATIVE ONLY FOR THE PURPOSES OF OBTAINING AN ESTIMATED FOOTPRINT. FINAL LAYOUT WILL BE SUBJECT TO FURTHER DESIGN INCLUDING BUT NOT LIMITED TO GEOTECHNICAL, HYDROLOGY, ENVIRONMENTAL AND CONSTRUCTABILITY INVESTIGATIONS.
2. UTM84-50S GIS COORDINATE SYSTEM HAS BEEN UTILIZED.
3. THE SOLAR PV LAYOUT HAS BEEN DESIGNED WITH JA SOLAR JMW7242-650/LB BIFACIAL MODULES AND SMA 4600 MPVS. THE LAYOUT MAY CHANGE IF DIFFERENT EQUIPMENT IS SELECTED.
4. THE BESS LAYOUT HAS BEEN DESIGNED WITH CATL TENER STACK (4MM BESS) AND SMA 4600 MPVS. THE LAYOUT MAY CHANGE IF DIFFERENT EQUIPMENT IS SELECTED.
5. TRACKER DETAIL TO BE CONFIRMED BY THE OEM.
6. SMA MPVS ARE TO BE SUPPLIED WITH ACCESS PLATFORM AND STAIRS.
7. THE NUMBER OF PILES ARE TO BE CONFIRMED AFTER THE GEOTECHNICAL AND WIND STUDIES ARE COMPLETED.
8. NO THERMAL DERATING HAS BEEN CONSIDERED FOR THE FIELD MPVS. THE POC CAPACITY IS BASED ON THE 0.95 POWER FACTOR APPLICATION.
9. THE CONFIGURATION OF THE INTERNAL ROAD LAYOUT IS CONTINGENT UPON THE FINDINGS OF THE FLOOD STUDY.
10. SOLAR ARRAY CONFIGURATIONS SUBJECT TO OPTIMISATION.

NOMINAL INSTALLED POWER CAPACITY	250	MW
NOMINAL INSTALLED ENERGY CAPACITY	2	GWh
NUMBER OF SMA 4600 MUPS	63	
NUMBER OF CATL TENER STACKS	252	
NUMBER OF CATL TENER STACKS PER PCS	4	



3 STRING TRACKER TYPICAL ROW - PLAN
NOT TO SCALE

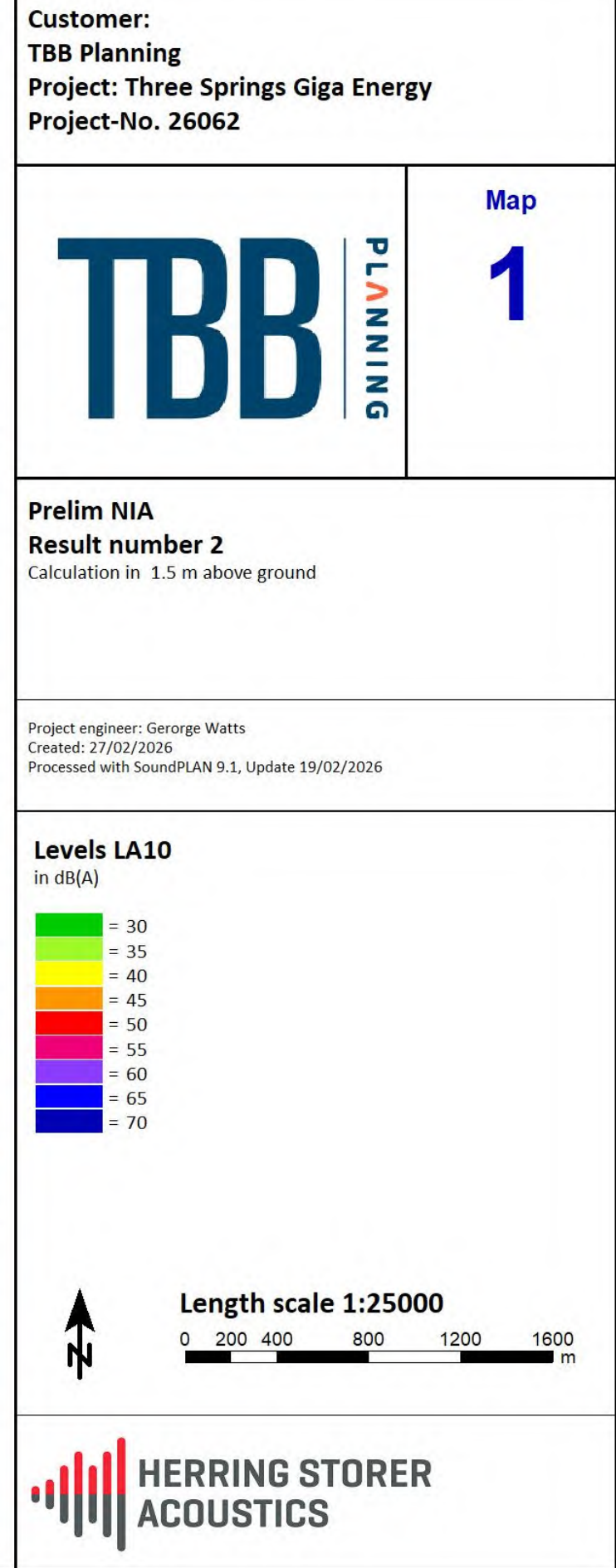


Status: PRELIMINARY

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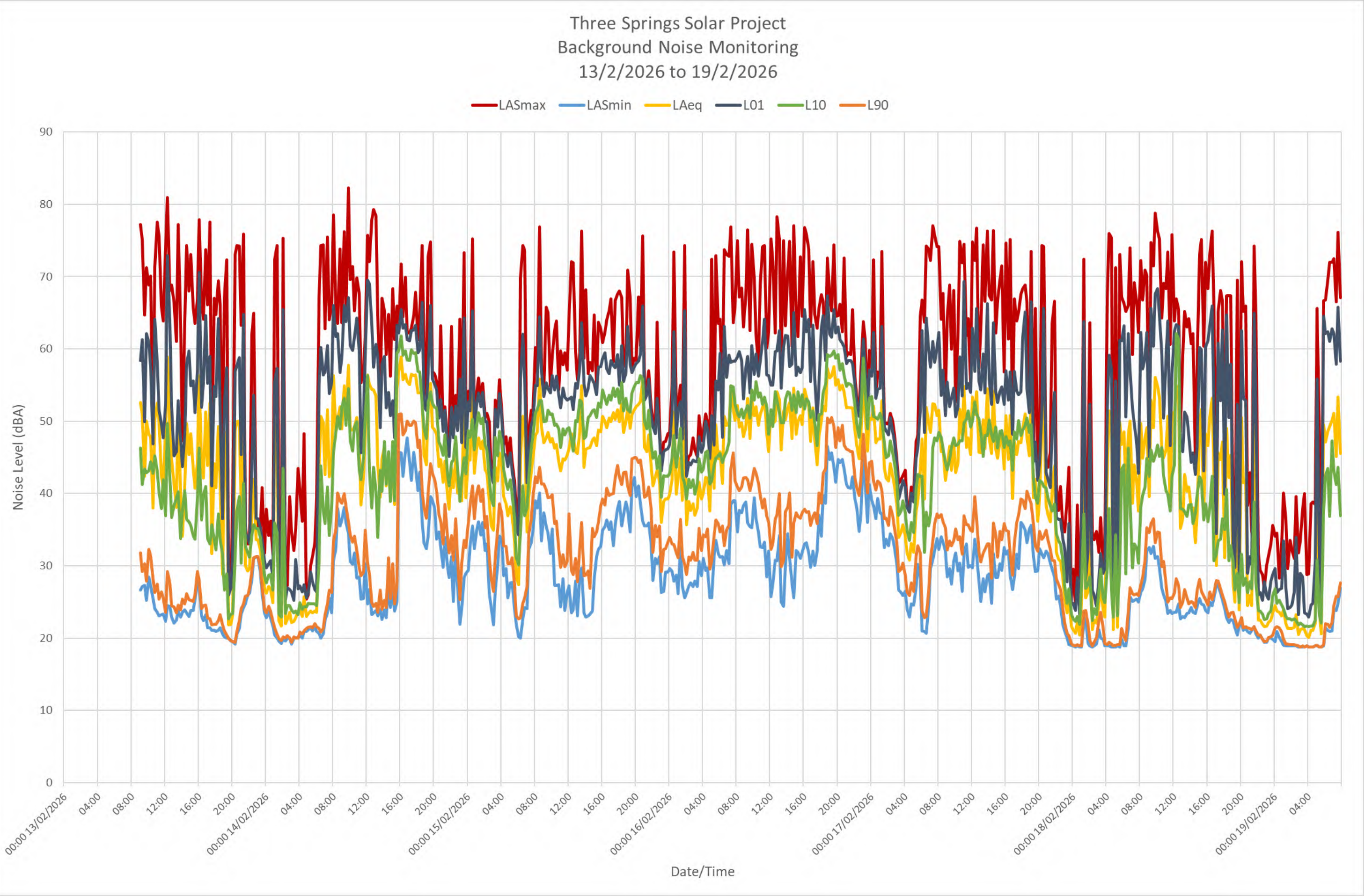
APPENDIX B

NOISE CONTOUR PLOT



APPENDIX C

MONITORED DATA





Appendix E

VISUAL LANDSCAPE ARTISTIC IMPRESSIONS





1

Artistic Impression : Concept design illustrated by an artist. The final design will be reviewed during the detailed design phase.



2

Artistic Impression : Concept design illustrated by an artist. The final design will be reviewed during the detailed design phase.



3

Artistic Impression : Concept design illustrated by an artist. The final design will be reviewed during the detailed design phase.







Appendix F

BUSHFIRE MANAGEMENT PLAN





Bushfire Management Plan

Proposed Solar Facility
Lot 201 Perenjori-Three Springs Road and
Lot 25 Midlands Road, Womarden

Report No:

A25.378-RPT-BMP_0_FINAL

Issue Date:

16-Apr-2026

Status

FINAL

Prepared for:

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16-Apr-2026	16-Apr-2026	16-Apr-2026

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Bushfire Protection

The bushfire management measures and risk treatments proposed in this document do not guarantee that buildings or infrastructure will not be damaged in a bushfire, nor that there will be no injuries or fatalities either on the site or offsite while evacuating. Primarily, this is due to the unpredictable nature and behaviour of fire and fire weather conditions. In addition, implementation of the required bushfire management measures (including construction standards, maintenance etc.) and any other required or recommended measures, will depend upon, among other things, the ongoing actions of landowners and/or operators over which WEPL has no control.

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This report is intended to be read in its entirety, and sections or parts of this report should therefore not be read and relied on out of context.

WEPL will not be liable to update or revise this report to take into account any events or circumstances or facts becoming apparent after the date of this report.

Table of Contents

1.	Introduction	1
1.1.1	Proposal Details.....	1
1.1.2	Site context	2
1.1.3	Purpose and Application of the BMP	2
1.1.4	Limitations.....	2
2.	Environmental Considerations	6
2.1.1	Native Vegetation - Modification and Clearing	6
2.1.2	Revegetation / Landscape Plans.....	6
3.	Bushfire Assessment Results.....	7
3.1	Bushfire Assessment Methodology.....	7
3.2	Bushfire Assessment Inputs	7
3.2.1	Fire Danger Index	7
3.2.2	Vegetation Classification and Slope under Vegetation	8
3.2.3	Post Development Scenario	8
3.3	Bushfire Assessment Outputs	11
3.3.1	BAL Assessment.....	11
3.3.2	Method 2 BAL Assessment	12
3.3.3	BAL Assessment Summary	13
3.4	Identification of Issues Arising from the BAL Assessment.....	14
4.	Assessment Against the Bushfire Protection Criteria.....	16
4.1	Compliance	16
4.2	Additional Bushfire Management Requirements.....	17
4.2.1	Renewable Energy Assessment Framework.....	17
5.	Responsibilities for Implementation and Management of Bushfire Management Measures.....	19
6.	Conclusion	20
7.	References.....	21

Tables

Table 1: Pre-Development Vegetation Classifications	8
Table 2: Method 1 BAL Calculations (BAL Contours).....	11
Table 3: Method 2 BAL Calculations	13
Table 4: BAL Ratings for Assets Within the Subject Site.....	13
Table 5: Assessment Against the Bushfire Protection Criteria	16
Table 6: Proposed Works Program	19

Figures

Figure 1: Site Overview.....	3
Figure 2: Site Plan	4
Figure 3: Bushfire Prone Areas	5
Figure 4: Pre-Development Vegetation Classifications	9
Figure 5: Post-Development Vegetation Classifications	10
Figure 6: Bushfire Attack Level (BAL) Contours.....	15
Figure 7: Spatial Representation of Bushfire Management Measures	18

Appendices

Appendix A: Vegetation Classification Photos
Appendix B: Asset Protection Zone Technical Requirements
Appendix C: Method 2 BAL Calculations
Appendix D: Vehicular Access Technical Requirements
Appendix E: CFA Design Guidelines Assessment

1. Introduction

1.1.1 Proposal Details

TBB Planning, on behalf of Progressive Green Solutions, is seeking to progress a development application for a proposed solar facility across portions of Lot 201 (No.3024) Perenjori-Three Springs Road and Lot 25 (No. 17112) Midlands Road, Womarden (hereafter referred to as the subject site, Figure 1). The proposed development will result in an intensification of land use and involves the construction of the following components, as shown on Figure 2:

- Solar modules.
- 35 Power Conversion Systems (PCS) units.
- Battery energy storage system (BESS) facility, including battery containers, substations and 70 PCS units.
- Six (6) meteorological stations.
- Incidental access roads, laydown areas, water tanks and security fencing.

Portions of the subject site are designated as bushfire prone as per the *Western Australia State Map of Bush Fire Prone Areas* (DFES, 2024; Figure 3) which typically trigger bushfire planning requirements under *State Planning Policy 3.7 Bushfire* (SPP 3.7; WAPC, 2024a) and the associated *Planning for Bushfire Guidelines* (the Guidelines; WAPC, 2024b).

However, SPP 3.7 only applies to habitable buildings within bushfire prone areas, with non-habitable infrastructure generally exempt. Whilst there are no habitable buildings proposed in bushfire prone areas, WEPL acknowledges that the proposed development could be impacted by bushfires or may result in bushfire ignition. This BMP has therefore assessed all non-habitable infrastructure given certain assets and infrastructure are designated as bushfire prone, as shown on Figure 3.

Furthermore, the Department of Fire and Emergency Services (DFES) recommend assessment of renewable energy facilities in bushfire prone areas against the Country Fire Authority (CFA) *Design Guidelines and Model Requirements for Renewable Energy Facilities Version 4* (CFA Design Guidelines; State of Victoria 2023). The CFA Design Guidelines are considered best practice for renewable energy facilities and have therefore been applied to the buildings and assets proposed in a designated bushfire prone area.

Western Environmental Approvals Pty Ltd (WEPL) was commissioned to prepare a Bushfire Management Plan (BMP) to support the development application. This BMP has been prepared by Assistant Bushfire Consultant Fraser Wray and Principal Bushfire Consultant Dylan Wray (FPAA BPAD Level 3 Certified Practitioner No. BPAD44656).

1.1.2 Site context

The subject site is located within the Shire of Three Springs and is zoned rural under Shire of Three Springs Local Planning Scheme No. 2.

The subject site has historically been used for agricultural purposes and comprises of pastoral paddocks, dams and salt lakes. The subject site is intersected by Perenjori-Three Springs Road and is bound by the existing Three Springs terminal and rural properties to the west, rural properties to the north and salt lakes to the east and south.

1.1.3 Purpose and Application of the BMP

This BMP has been prepared in accordance with SPP 3.7 and the Guidelines to support the assessment of the development application for the subject site submitted to the Shire of Three Springs. A comprehensive assessment against the CFA Design Guidelines has also been incorporated into the BMP, as recommended by DFES.

In addition, this BMP provides strategies and guidance to reduce the level of bushfire risk exposure for the subject site through implementation of a range of bushfire management measures in accordance with the Guidelines.

1.1.4 Limitations

It is acknowledged that specific details are still unknown given the project is in the preliminary design stage. Where specific details are still unknown, the BMP details how the bushfire protection criteria are likely to be achieved at the detailed design stage. It is recommended that this BMP is updated prior to building permit to ensure the detailed design achieves compliance with the bushfire protection criteria in the Guidelines and the relevant requirements under the CFA Design Guidelines.

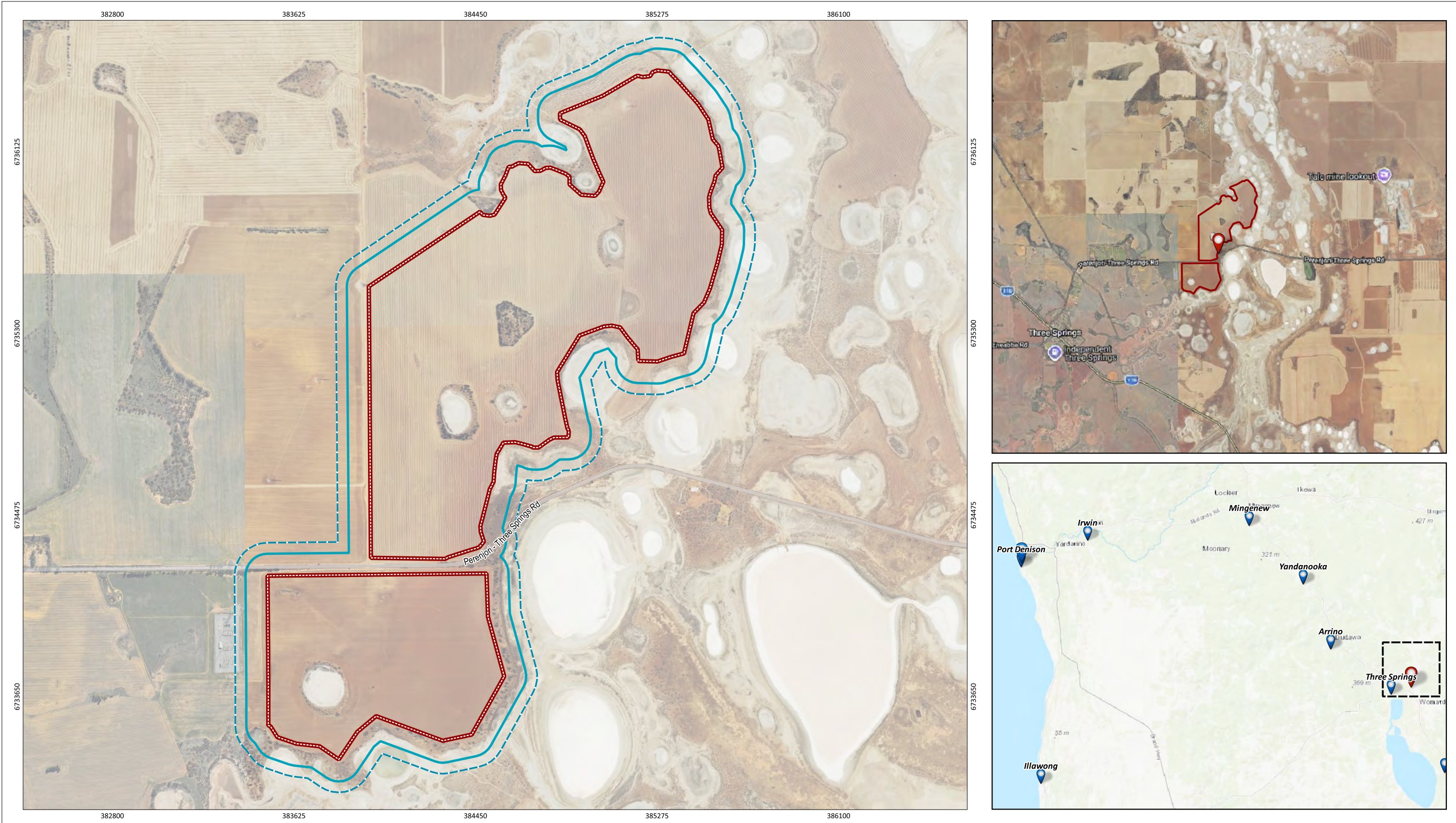


Figure 1: Site Overview

N 0 200 400 600 800 m		PROJECT/REPORT NAME Bushfire Management Plan Lot 201 (3024) Perenjori – Three Springs Road and Lot 25 (No. 17112) Midlands Road, Womarden		Legend Subject Site Buffer 100m Buffer 150m	WESTERN ENVIRONMENTAL Western Environmental Pty Ltd 08 6244 2310 enquiries@westernv.com.au Level 3/25 Prowse St, West Perth WA 6005 western.com.au
SCALE 1:16,500	SHEET SIZE A3 COLOUR	CLIENT Progressive Green Solutions			
COORDINATE REFERENCE SYSTEM GDA2020 / MGA zone 50		PROJECT NUMBER A25.378	VERSION 0		
DATA SOURCE LANDGATE AERIAL IMAGERY		DRAWN BY / REVIEWED BY JP/DW	DATE 30/3/2026		



Figure 3: Bushfire Prone Areas

↑

N

0

75

150

225

300 m

SCALE

1:10,500

COORDINATE REFERENCE SYSTEM

GDA2020 / MGA zone 50

DATA SOURCE

LANDGATE AERIAL IMAGERY

PROJECT/REPORT NAME

Bushfire Management Plan
Lot 201 (3024) Perenjori – Three Springs Road
and Lot 25 (No. 17112) Midlands Road,
Womarden

CLIENT

Progressive Green Solutions

PROJECT NUMBER

A25.378

VERSION

0

DRAWN BY / REVIEWED BY

JP/DW

DATE

30/3/2026

Legend

Subject Site

Buffer 100m

Buffer 150m

Solar Modules (Bushfire Prone)

Solar Modules (Non-Bushfire Prone)

Power Conversion Units (Bushfire Prone)

Power Conversion Units (Non-Bushfire Prone)

BESS and Substations (Non-Bushfire Prone)

Bush Fire Prone Area Planning (OBRM-023)

Bushfire Prone Area 2

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2. Environmental Considerations

SPP 3.7 policy objective 5.4 recognises the need to consider bushfire risk management measures alongside environmental, biodiversity and conservation values.

The proposed development only requires the clearing of crop grassland which does not have any environmental values. WEPL is not aware of any environmental approvals required for the development to proceed.

2.1.1 Native Vegetation - Modification and Clearing

A desktop review of publicly available data indicates no native vegetation within the project area. Remnant native vegetation along the edges of the adjacent salt lakes will not be impacted by the proposed development or measures contained within this BMP.

2.1.2 Revegetation / Landscape Plans

No revegetation or landscaping is proposed within the subject site.

3. Bushfire Assessment Results

3.1 Bushfire Assessment Methodology

A Bushfire Attack Level (BAL) Contour Assessment has been undertaken in accordance with Method 1 of *Australian Standard AS 3959: 2018 Construction of Buildings in Bushfire Prone Areas* (AS 3959: 2018; SA, 2018) to illustrate the radiant heat impact on the bushfire prone assets and infrastructure. However, given SPP 3.7 and the Guidelines do not apply to non-habitable infrastructure, a hybrid assessment methodology has been applied. The CFA Design Guidelines state that separation must be at least the distance where radiant heat flux (output) from the vegetation does not create the potential for ignition of on-site infrastructure.

As such, the aim of the assessment is to ensure appropriate separation in the form of Asset Protection Zones (APZs) are maintained between permanent bushfire hazards and the bushfire prone assets and infrastructure. The following separation distances, in the form of APZs, have been applied:

- The PCS units have been classified as high-risk assets, given they could potentially ignite a bushfire, prolong its duration, or increase its intensity. A radiant heat impact threshold of 10kW/m^2 for high-risk assets is widely adopted as best practice to ensure sufficient separation distances are established. As such, the PCS units shall be set back from bushfire hazards to ensure the radiant heat impact does not exceed 10kW/m^2 calculated using a flame temperature of 1090K. A Method 2 BAL assessment has been undertaken in accordance with Appendix B of AS 3959: 2018 to calculate the separation distance between the high-risk assets and permanent bushfire hazards.
- The solar modules have been classified as low-risk assets given they present a reduced risk of bushfire ignition and can readily be replaced if damaged by a bushfire. The solar modules shall be set back from bushfire hazards to ensure the radiant heat impact does not exceed 29kW/m^2 (BAL-29).
- The above setbacks do not apply to assets and infrastructure that are not designated as bushfire prone on Figure 3.

3.2 Bushfire Assessment Inputs

A bushfire assessment has been undertaken for the proposed development in accordance with the Guidelines and AS 3959: 2018. Inputs to this assessment are detailed below.

3.2.1 Fire Danger Index

A blanket Fire Danger Index (FDI) 80 is adopted for Western Australia, as outlined in AS 3959: 2018.

3.2.2 Vegetation Classification and Slope under Vegetation

Vegetation and effective slope (i.e. slope under vegetation) within the subject site and surrounding 150 m (the assessment area) were assessed on 9/03/2026 in accordance with the Guidelines and AS 3959: 2018.

The classified vegetation and effective slope for the subject site from each of the identified vegetation plots are identified below in Table 1 and Figure 4.

Table 1: Pre-Development Vegetation Classifications

Plot	Vegetation classification	Effective slope
1	Class A Forrest	All upslopes and flat land (0 degrees)
2	Class D Scrub	Downslope >0 to 5 degrees
3	Class D Scrub	All upslopes and flat land (0 degrees)
4	Class C Shrubland	Downslope >0 to 5 degrees
5	Class C Shrubland	All upslopes and flat land (0 degrees)
6	Class G Grassland	Downslope >0 to 5 degrees
7	Class G Grassland	All upslopes and flat land (0 degrees)
8	Excluded - clause 2.2.3.2 (e)	-

Photographs relating to each area and vegetation type are included in Appendix A.

3.2.3 Post Development Scenario

The assessment outputs in this BMP have been based on the post development scenario as shown in Figure 5. The post development scenario is based on:

- APZs being established and maintained in accordance with the APZ technical requirements in Appendix B. This includes routinely slashing of grass to a height less than 100mm.
- The remainder of the subject site, outside of the APZs, being maintained in a low threat state, in perpetuity.

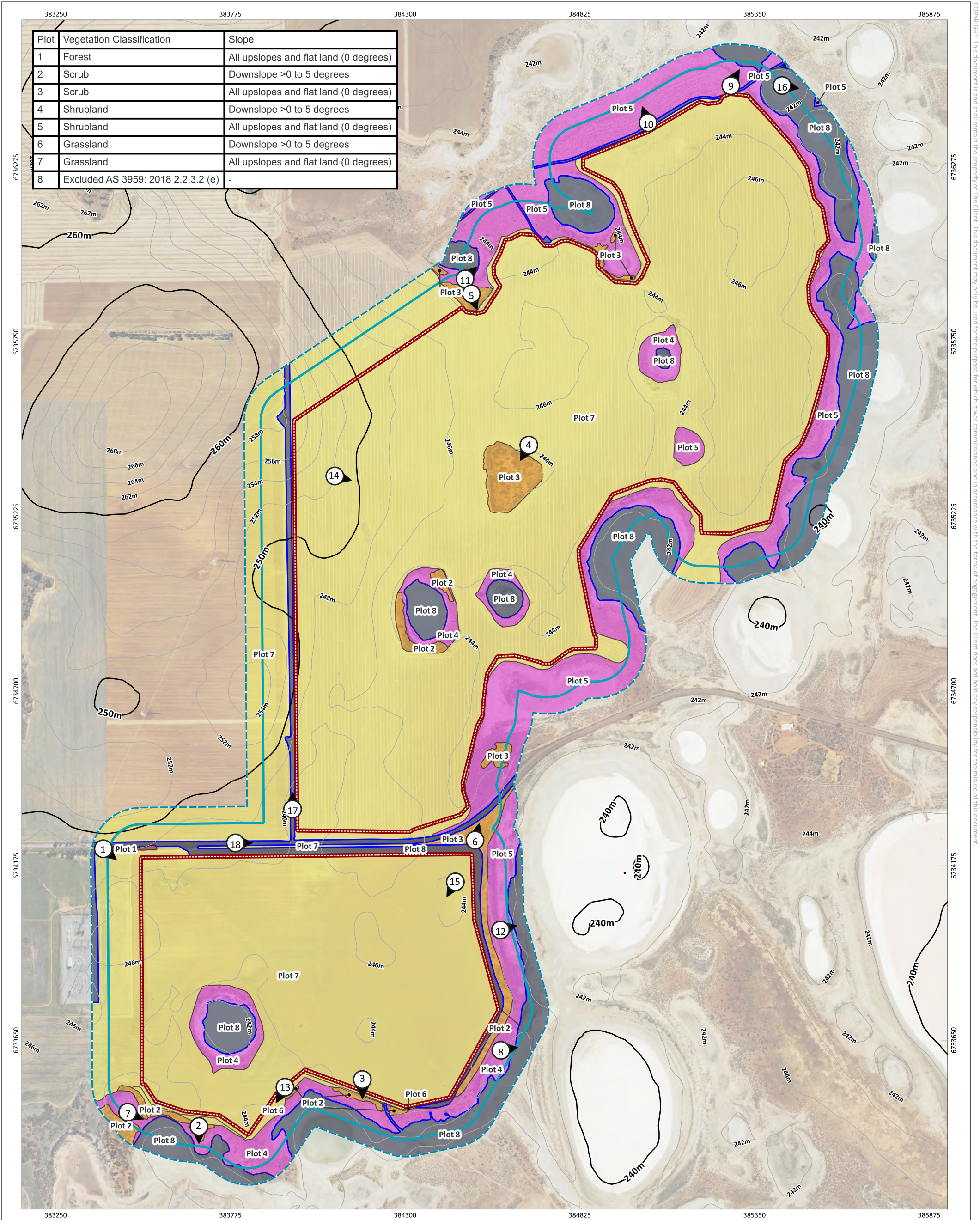


Figure 4: Vegetation Classification (Pre-Development)

075150225300

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SCALE

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SHEET SIZE

A3 COLOUR

COORDINATE REFERENCE SYSTEM

GDA2020 / MGA zone 50

DATA SOURCE

LANDGATE AERIAL IMAGERY

PROJECT/REPORT NAME

Bushfire Management Plan
Lot 201 (3024) Perenjori – Three Springs Road
and Lot 25 (No. 17112) Midlands Road,
Womarden

CLIENT

Progressive Green Solutions

PROJECT NUMBER

A25.378

VERSION

0

DRAWN BY / REVIEWED BY

JP/DW

DATE

30/3/2026

Legend

Subject Site

Buffer 100m

Buffer 150m

Photos

2 metre contours (DPIRD-072)

2m

10m

Vegetation Classification

Class A - Forest

Class C - Shrubland

Class D - Scrub

Class G - Grassland

Excluded AS 3959: 2018 2.2.3.2 (e)

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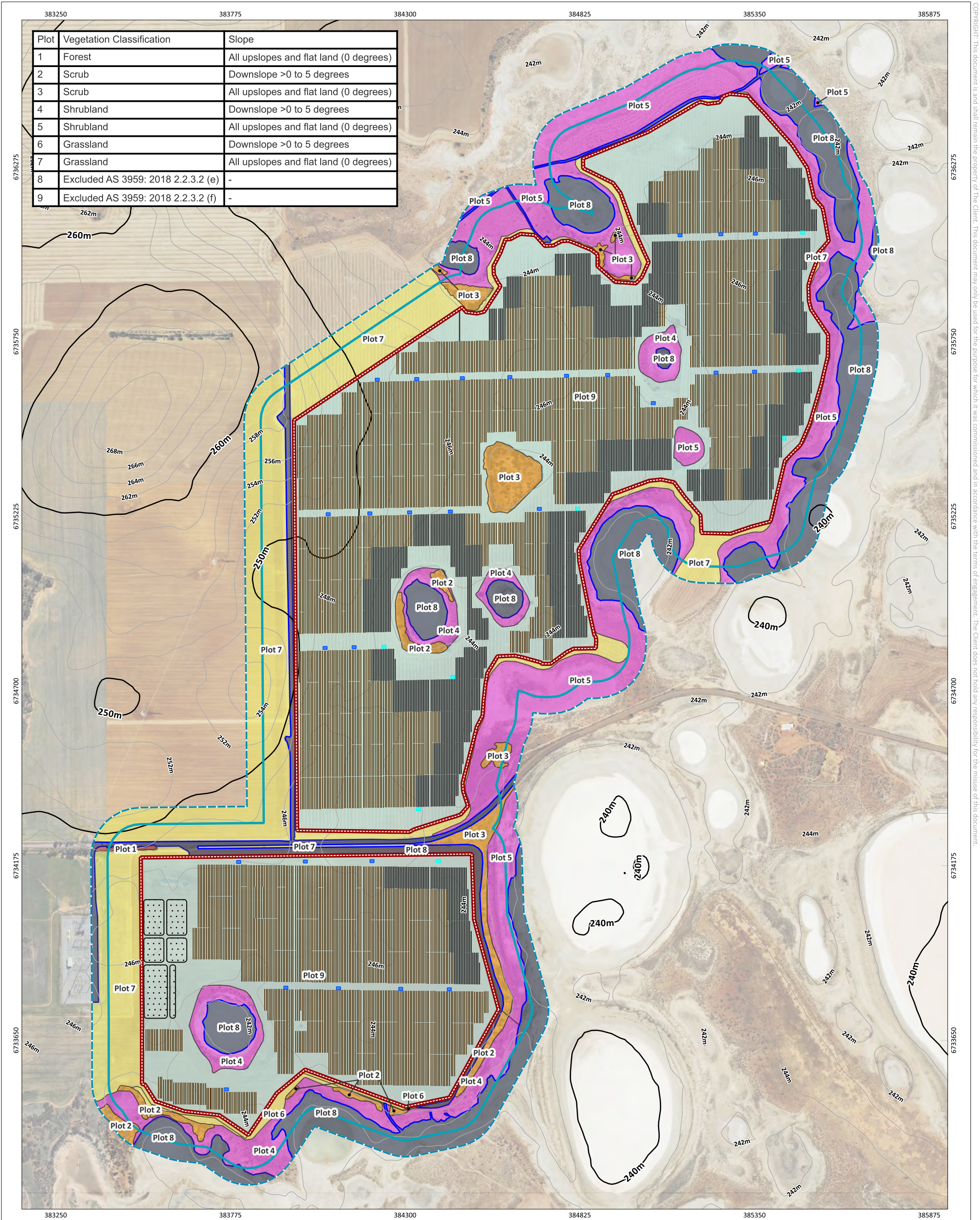


Figure 5: Vegetation Classification (Post-Development)

075150225300 m

N

SCALE
1:10,500

COORDINATE REFERENCE SYSTEM
GDA2020 / MGA zone 50

DATA SOURCE
LANDGATE AERIAL IMAGERY

SHEET SIZE
A3 COLOUR

CLIENT
Progressive Green Solutions

PROJECT NUMBER
A25.378

VERSION
0

DRAWN BY / REVIEWED BY
JP/DW

DATE
30/3/2026

Legend

Subject Site

Buffer 100m

Buffer 150m

2 metre contours (DPIRD-072)

2m

10m

Solar Modules
(Bushfire Prone)

Solar Modules
(Non-Bushfire Prone)

Power Conversion Units
(Bushfire Prone)

Power Conversion Units
(Non-Bushfire Prone)

BESS and Substations
(Non-Bushfire Prone)

Vegetation Classification

Class A - Forest

Class C - Shrubland

Class D - Scrub

Class G - Grassland

Excluded AS 3959: 2018 2.2.3.2 (e)

Excluded AS 3959: 2018 2.2.3.2 (f)

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3.3 Bushfire Assessment Outputs

A BAL assessment has been undertaken in accordance with SPP 3.7, the Guidelines, AS 3959: 2018 and the bushfire assessment inputs in Section 3.2.

3.3.1 BAL Assessment

All land located within 100 m of the classified vegetation depicted in Figure 4 is considered bushfire prone and is subject to a BAL assessment in accordance with AS 3959: 2018.

A Method 1 BAL assessment (as outlined in AS 3959: 2018) has been completed for the areas of the subject site that are bushfire prone and incorporates the following factors:

- Fire Danger Index (FDI) rating.
- Vegetation class.
- Slope under classified vegetation.
- Distance between assets and classified vegetation.

Table 2 and Figure 6 contain the outputs (in the form of BAL contours) from the Method 1 BAL assessment for all areas of classified vegetation within the assessment area. The BAL rating gives an indication of the expected level of bushfire attack (i.e. radiant heat flux, flame contact and ember penetration) that may be received by proposed assets and infrastructure.

Table 2: Method 1 BAL Calculations (BAL Contours)

Plot	Vegetation classification	Effective slope	Separation distances required (m)				
			BAL-FZ	BAL-40	BAL-29	BAL-19	BAL-12.5
1	Class A Forest	All upslopes and flat land (0 degrees)	<16	16-<21	21-<31	31-<42	42-<100
2	Class D Scrub	Downslope >0 to 5 degrees	<11	11-<15	15-<22	22-<31	31-<100
3	Class D Scrub	All upslopes and flat land (0 degrees)	<10	10-<13	13-<19	19-<27	27-<100
4	Class C Shrubland	Downslope >0 to 5 degrees	<7	7-<10	10-<15	15-<22	22-<100
5	Class C Shrubland	All upslopes and flat land (0 degrees)	<7	7-<9	9-<13	13-<19	19-<100
6	Class G Grassland	All upslopes and flat land (0 degrees)	<7	7-<9	9-<14	14-<20	20-<50

Plot	Vegetation classification	Effective slope	Separation distances required (m)				
			BAL-FZ	BAL-40	BAL-29	BAL-19	BAL-12.5
7	Class G Grassland	All upslopes and flat land (0 degrees)	<6	6-<8	8-<12	12-<17	17-<50
8	Excluded - clause 2.2.3.2 (e)	-	No separation distances required (BAL-LOW)				
9	Excluded - clause 2.2.3.2 (f)	-	No separation distances required (BAL-LOW)				

3.3.2 Method 2 BAL Assessment

A Method 2 BAL assessment (as outlined in Appendix C) has also been completed to determine the minimum distance between the high-risk assets and classified vegetation to ensure the radiant heat impact does not exceed 10kW/m². Inputs to the Method 2 BAL assessment are summarised below:

- Relevant Fire Danger Index: FDI 80 (not modified from standard inputs).
- Vegetation classification and slope under vegetation: Refer to Table 1.
- Slope between site and classified vegetation: Flat (0 degrees).
- Flame length: Automatically calculated (refer to Appendix C).
- Flame width: 100m (unmodified from standard inputs).
- Elevation of receiver: Default (peak) value used.
- Flame emissivity: 0.95 (not modified from standard inputs).
- Flame temperature: 1090K (not modified from standard inputs).

Table 3 contains the separation distances calculated using the above inputs in accordance with Appendix B of AS 3959: 2018. The minimum setbacks to ensure the radiant heat impact does not exceed 10kW/m² is depicted on Figure 6. These setbacks only apply to the bushfire prone PCS units (high-risk assets).

Table 3: Method 2 BAL Calculations

Plot	Vegetation classification	Effective slope ¹	Separation distances required (m)
1	Class A Forest	All upslopes and flat land (0 degrees)	<48.9 m
2	Class D Scrub	Downslope >0 to 5 degrees	<37.2 m
3	Class D Scrub	All upslopes and flat land (0 degrees)	<32.9 m
4	Class C Shrubland	Downslope >0 to 5 degrees	<26.9 m
5	Class C Shrubland	All upslopes and flat land (0 degrees)	<23.5 m
6	Class G Grassland	Downslope >0 to 5 degrees	<24.6 m
6	Class G Grassland	All upslopes and flat land (0 degrees)	<21.2 m
7	Excluded - clause 2.2.3.2 (e)	-	No separation distances required (BAL-LOW)
8	Excluded - clause 2.2.3.2 (e)	-	No separation distances required (BAL-LOW)

3.3.3 BAL Assessment Summary

The proposed layout has adopted the required setbacks to achieve the applicable radiant heat exposure thresholds outlined in Section 3.1. Following the establishment of the APZs, high-risk bushfire prone assets (PCS units) will be subject to a radiant heat impact not exceeding 10kW/m² and low-risk bushfire prone assets (solar modules) will be subject to a radiant heat impact not exceeding 29 kW/m² (BAL-29).

A summary of the BAL ratings for the bushfire prone assets within the subject site is provided in Table 4.

Table 4: BAL Ratings for Assets Within the Subject Site

Proposed Asset	Asset Type	Plot Most Affecting BAL Rating	Separation Distance (min)	Radiant Heat Impact / BAL Rating
PCS Units	High-Risk	Plot 2	37.2 m	10 kW/m ²
Solar modules	Low-Risk	Plot 2	15 m	29 kW/m ² (BAL-29)

¹ The effective slope has been rounded up to the maximum value of each slope band in Table 2.5 of AS3959: 2018.

3.4 Identification of Issues Arising from the BAL Assessment

Post-development, all high-risk bushfire prone assets (PCS units) will be setback from classifiable vegetation to ensure the radiant heat impact does not exceeding 10kW/m^2 . The low-risk bushfire prone assets (solar modules) will be setback from classifiable vegetation to ensure a radiant heat impact not exceeding 29 kW/m^2 (BAL-29). No issues have been identified from the BAL assessment given all bushfire prone assets can be appropriately located to reduce the potential impact from a bushfire while also reducing the potential for the asset to ignite a bushfire, prolong its duration, or increase its intensity

A reassessment of BAL ratings, through either a BMP addendum or revised BMP will be undertaken if changes to development design or classified vegetation within the assessment area which require a modified bushfire management response occur.

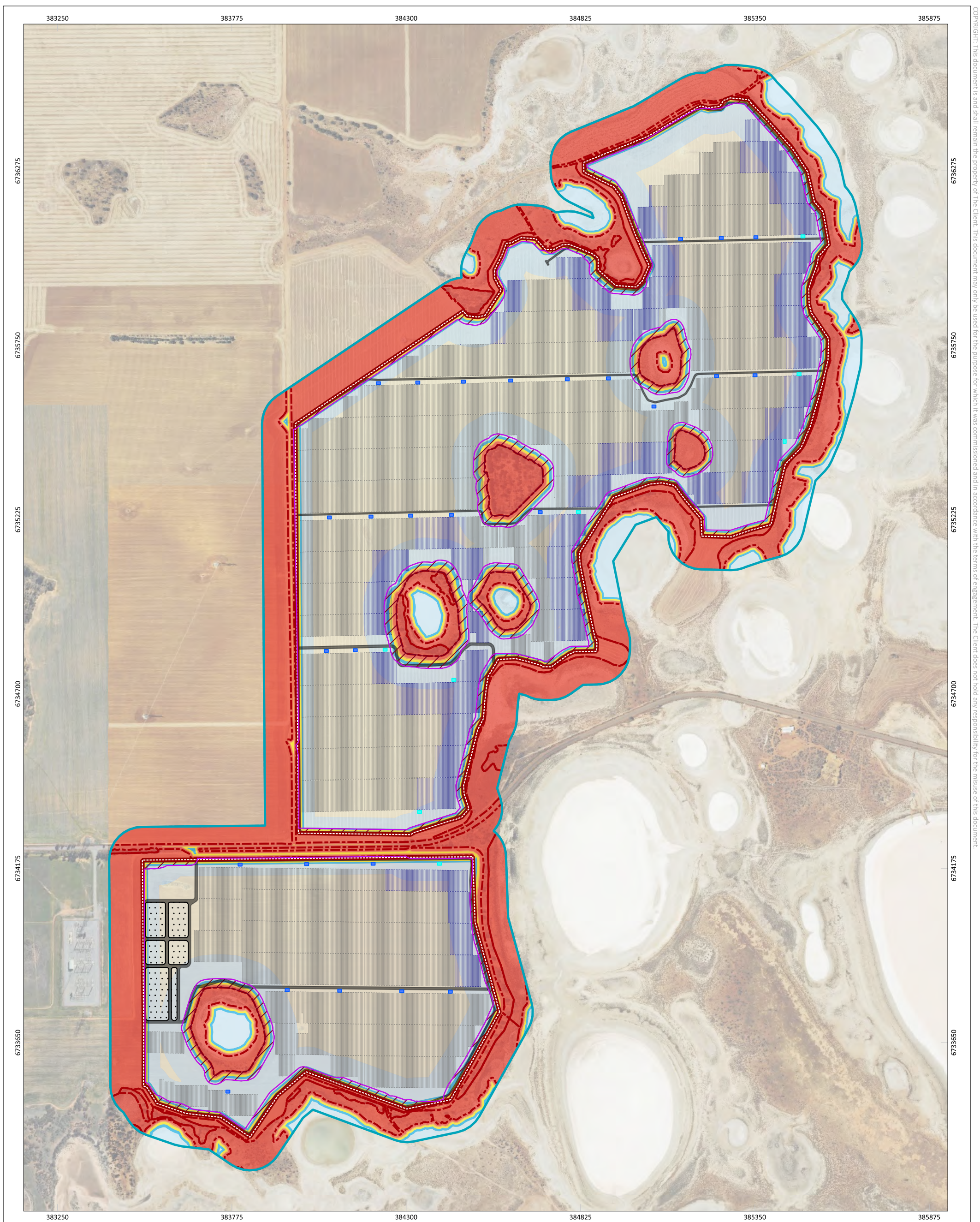
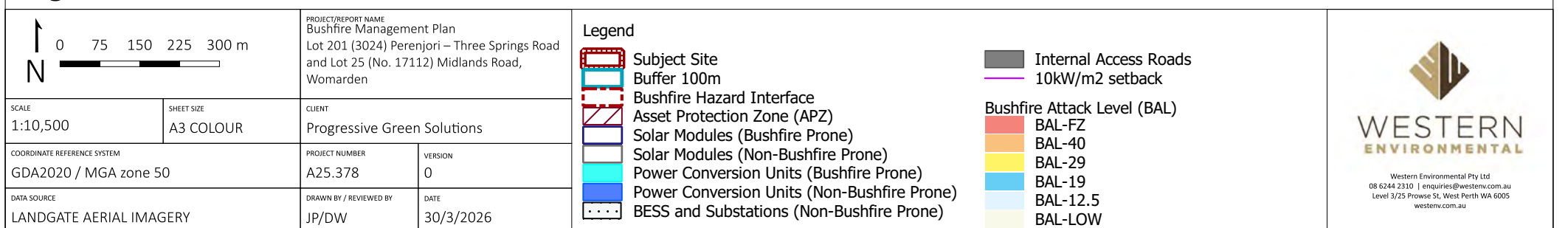


Figure 6: Bushfire Attack Level (BAL) Contours



4. Assessment Against the Bushfire Protection Criteria

4.1 Compliance

The proposed bushfire prone assets have been assessed against Bushfire Protection Criteria 7 of the Guidelines, accepted as the most relevant criteria to non-habitable infrastructure.

Table 5 outlines the Acceptable Solutions (AS) that are relevant to the proposal and summarises how the intent of each Bushfire Protection Criteria has been achieved through the application of bushfire risk management measures. No Outcomes-based approaches (OA) have been proposed for this development. These management measures are depicted in Figure 7 where relevant.

Implementation of this BMP is expected to meet policy outcomes 6.1-6.4 of SPP 3.7.

Table 5: Assessment Against the Bushfire Protection Criteria

Bushfire Protection Criteria 7: Development - Commercial and industrial	AS	OA	N/A
Element 1: Location	☐	☐	✓
Not applicable - Element 1 does not apply to development applications.			
Element 2: Siting and design	☐	☐	✓
A2.1a Siting and design	☐	☐	✓
Not applicable - No habitable buildings are proposed as part of the proposed development. All high-risk bushfire prone assets (PCS units) will be situated in area that is subject to a radiant heat impact not exceeding 10kW/m ² . All Low risk bushfire prone assets (solar modules) will be situated in area not subject to an area that is subject to a radiant heat impact not exceeding 29 kW/m ² (BAL-29).			
A2.2 Asset Protection Zone (APZ)	☐	☐	✓
Not applicable - No habitable buildings are proposed as part of the proposed development. However, APZs will be established to provide suitable separation from areas of classifiable vegetation within and external to the subject site. The APZs shall be established and maintained in accordance with the APZ technical requirements in Appendix B. The high-risk bushfire prone assets (PCS units) will have APZs sufficient for the potential radiant heat to not exceed 10kW/m ² at a flame temperature of 1090K.			
A2.3 Clearing of native vegetation	☐	☐	✓
Not applicable - no native vegetation is proposed to be cleared within the subject site.			
A2.4 Storage of hazardous, flammable and/or combustible materials	☐	☐	✓
The proposed development does not include the bulk storage of hazardous, flammable or combustible materials. However, the PCS units are considered high-risk assets and will be located in areas that are subject to a radiant heat impact not exceeding 10kW/m ² . Notwithstanding, if any bulk quantities of hazardous, flammable and/or combustible materials are stored within the subject site, they should be stored in a non-combustible building or container and located in an area that is subject to a radiant heat impact less than 29 kW/m ² (BAL-29), as shown on Figure 6.			

Bushfire Protection Criteria 7: Development - Commercial and industrial	AS	OA	N/A
Element 3: Vehicular access			
A3.1 Private driveway	☐	☐	✓

Not applicable - private driveway requirements under the Guidelines only apply to internal access roads providing access to habitable buildings. As such, the vehicular access requirements under the CFA Design Guidelines have been applied.

The northern development area on Lot 201 will be accessed via an entrance along Geebulla Road and the southern development area on Lot 25 will be accessed via an entrance along Perenjori-Three Springs Road. Internal access roads will be provided throughout the proposed development, as indicatively shown on Figure 7. The design and location of the internal road network will be determined at detailed design stage, following completion of additional technical investigations.

The following requirements will apply to the internal access roads, as per the CFA Design Guidelines:

- Constructed in accordance with the technical requirements in Appendix D.
- A minimum 4m in width constructed of an all-weather surface material.
- Designed for two-way access or with passing bays every 200m.
- Turnaround areas for a Type 3.4 fire appliance vehicle if the internal access road terminates at a dead end. The indicative internal road network includes one (1) turnaround area, as shown on Figure 7.

The proposed access arrangements will enable a Type 3.4 Firefighting appliance and light vehicles to effectively access and egress the site in a bushfire emergency.

Element 4: Water supply			
A4.1 Water supply	☐	☐	✓

Not applicable - water supply requirements under the Guidelines only apply to habitable buildings. As such, the water supply requirements under the CFA Design Guidelines have been applied.

The subject site does not have access to a reticulated water supply. Static fire water tanks will be provided in accordance with the CFA Design Guidelines to ensure there is sufficient water available for firefighting purposes. The exact location of static water tanks will be determined at the detailed design stage.

The following water requirements will apply in accordance with the CFA Design Guidelines:

- One (1) 45,000 litre static fire water tank at each entry point - two (2) water tanks required.
- One (1) 45,000 litre static fire water tank for every 100ha - three (3) additional water tanks required.

Each static fire water tank must be constructed of non-combustible materials (steel or concrete) with a Storz connection for fire appliance vehicles. All exposed water supply pipes and fittings shall be metal with fittings located away from the source of bushfire attack.

Note: AS - Acceptable Solution, OS - Outcomes-based Approach, N/A - Not applicable.

4.2 Additional Bushfire Management Requirements

4.2.1 Renewable Energy Assessment Framework

SPP 3.7 and the Guidelines do not currently provide a comprehensive framework for the assessment of renewable energy facilities, with the bushfire protection criteria only applicable to habitable buildings. In the absence of a bushfire assessment framework catered towards renewable energy facilities in Western Australia, the CFA Design Guidelines are considered the most appropriate framework currently available in Australia. The proposed development has therefore been assessed against the requirements under the CFA Design Guidelines, tailored to Western Australia. The CFA Design Guidelines assessment in Appendix E is considered to meet the general objectives and policy requirements of SPP 3.7.

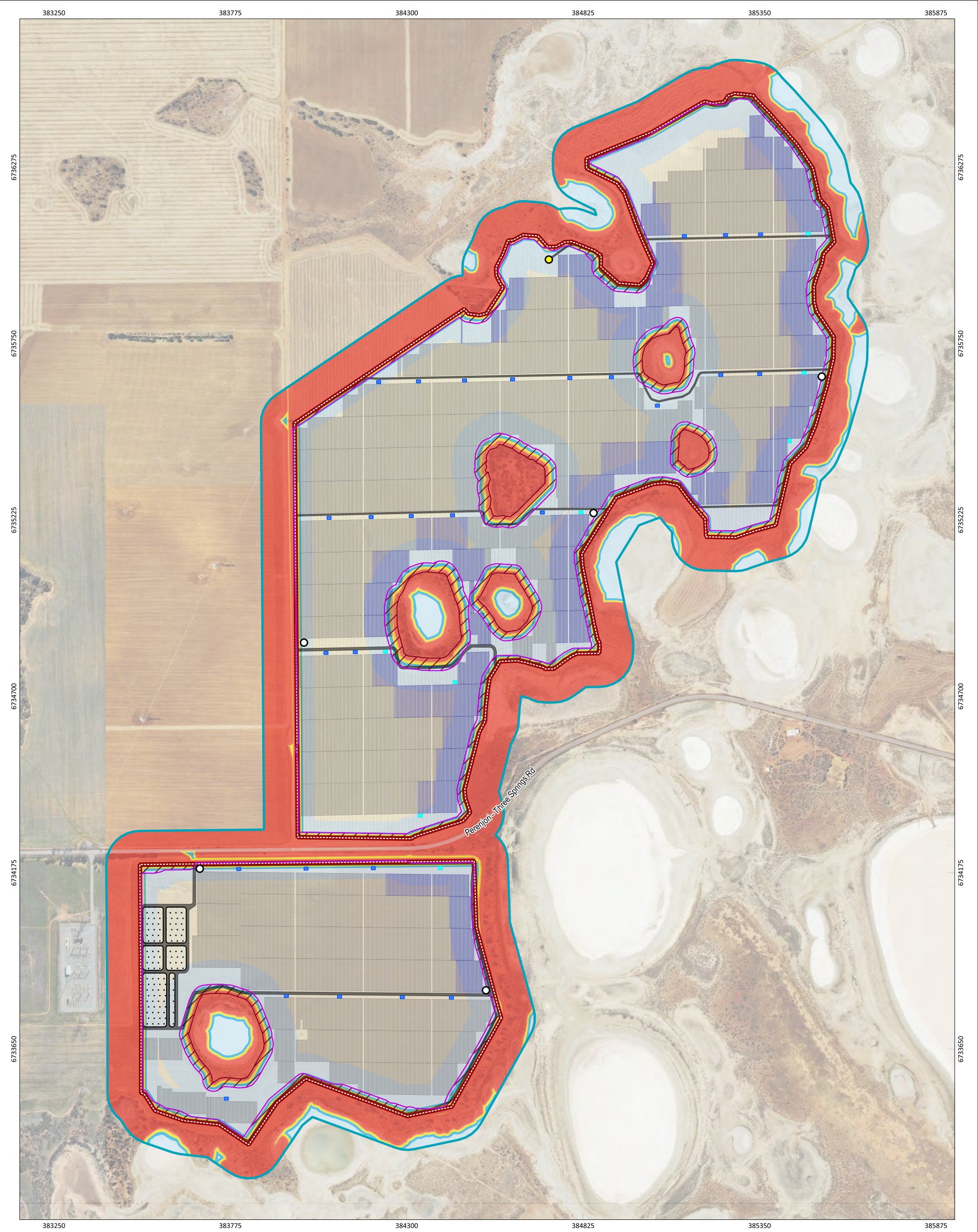


Figure 7: Bushfire Mitigation Measures

0

75

150

225

300 m

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SCALE

1:10,500

SHEET SIZE

A3 COLOUR

COORDINATE REFERENCE SYSTEM

GDA2020 / MGA zone 50

DATA SOURCE

LANDGATE AERIAL IMAGERY

PROJECT/REPORT NAME

Bushfire Management Plan

Lot 201 (3024) Perenjori – Three Springs Road

and Lot 25 (No. 17112) Midlands Road,

Womarden

CLIENT

Progressive Green Solutions

PROJECT NUMBER

A25.378

VERSION

0

DRAWN BY / REVIEWED BY

JP/DW

DATE

30/3/2026

Subject Site

Buffer 100m

Asset Protection Zone (APZ)

Solar Modules (Bushfire Prone)

Solar Modules (Non-Bushfire Prone)

Power Conversion Units (Bushfire Prone)

Power Conversion Units (Non-Bushfire Prone)

BESS and Substations (Non-Bushfire Prone)

Internal Access Roads

Turnaround Area

Indicative Water Tank

10kW/m2 setback

Bushfire Attack Level (BAL)

BAL-FZ

BAL-40

BAL-29

BAL-19

BAL-12.5

BAL-LOW

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5. Responsibilities for Implementation and Management of Bushfire Management Measures

Responsibility for implementation of the bushfire risk management measures outlined in Section 4 of this BMP applies to the developer, future owners/builders within the subject site and the local government. Table 6 provides a works program detailing these measures, timing of implementation and responsibility.

Table 6: Proposed Works Program

No.	Bushfire management measure
Developer responsibilities - Prior to commencement of operations	
1	Ensure that APZs are established in accordance with the design in Figure 7 and the APZ technical requirements in Appendix B.
2	Construct internal access roads of an all-weather surface material to the following trafficable widths: - A minimum width of 4 m with passing bays every 200 m. Passing bays shall be at least 20 m long and have a minimum width of 2 m (6m combined width of access road and passing bay); or - A minimum width of 6 m to enable two-way access and remove the need for passing bays. The internal access roads shall be constructed to comply with the private driveway technical requirements in Appendix D.
3	Construct access roads along the perimeter of the subject site in accordance with the above requirements.
	Construct turnaround areas for Type 3.4 fire appliance vehicle at the end of dead-end access roads. Turnaround areas shall be constructed in accordance with the design requirements in Appendix D.
4	Install the following static fire water tanks: - One (1) 45,000 litre static fire water tank at each entry point - two (2) tanks required. - One (1) 45,000 litre static fire water tanks for every 100 ha of development area - three (3) tanks required. Each tank shall be constructed of non-combustible materials and located within 4 m of a driveway or hardstand and not within 10 m of solar infrastructure. Tanks shall be fitted with a Storz connection and level indicators.
5	Update this BMP to ensure consistency with the detailed design.
6	Develop an Emergency Evacuation Plan taking guidance from the CFA Design Guidelines.
7	Develop a Risk Management Plan taking guidance from the CFA Design Guidelines.
Landowner responsibilities - Ongoing	
8	Maintain APZ in accordance with the APZ technical requirements in Appendix B.
9	Maintain the static fire water tanks to the required capacities outlined above.

6. Conclusion

In the professional opinion of the author, the proposed solar facility satisfies the intent, aim and objectives of SPP 3.7 and the Guidelines and is recommended for approval.

7. References

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Datasets Used

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<http://www.dfes.wa.gov.au/regulationandcompliance/bushfireproneareas/Pages/default.aspx>.

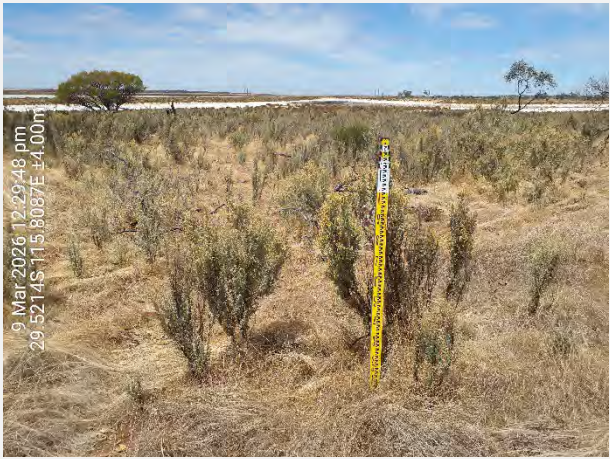
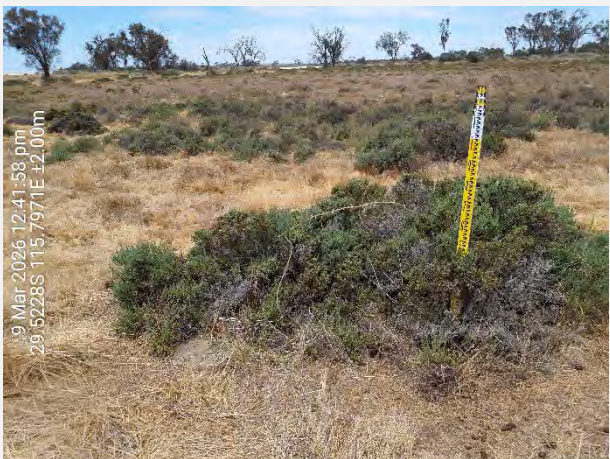
Department of Primary Industries and Regional Development (DPIRD). (2019). 2 metre contours (DPIRD-072). Retrieved on 17/03/2026 from <https://catalogue.data.wa.gov.au/dataset/dpird-2-metre-contours>

Appendix A:

Vegetation Classification Photos

Plot 1	Class A Forest
Photo 1 This plot contains trees up to 20 m in height with foliage cover exceeding 30% and grassy understorey. The slope under this vegetation was assessed to be flat/upslope.	
Plot 2	Class D Scrub
Photo 2 This plot contains shrubs and trees up to 6m in height and foliage cover exceeding 30% (height staff = 2m). The slope under this vegetation was assessed to be downslope > 0 - 5 degrees.	
Plot 2	Class D Scrub
Photo 3 This plot contains shrubs and trees up to 6m in height and foliage cover exceeding 30% (height staff = 2m). The slope under this vegetation was assessed to be downslope > 0 - 5 degrees.	

Plot 3	Class D Scrub
Photo 4 This plot contains shrubs and trees up to 6m in height and foliage cover exceeding 30% The slope under this vegetation was assessed to be flat/upslope.	
Plot 3	Class D Scrub
Photo 5 This plot contains shrubs and trees up to 6m in height and foliage cover exceeding 30% (height staff = 2m). The slope under this vegetation was assessed to be flat/upslope.	
Plot 3	Class D Scrub
Photo 6 This plot contains shrubs and trees up to 6m in height and foliage cover exceeding 30% The slope under this vegetation was assessed to be flat/upslope.	

Plot 4	Class C Shrubland
Photo 7 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be downslope > 0 - 5 degrees.	
Plot 4	Class C Shrubland
Photo 8 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be downslope > 0 - 5 degrees.	
Plot 5	Class C Shrubland
Photo 9 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be flat/upslope.	

Plot 5	Class C Shrubland
Photo 10 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be flat/upslope.	
Plot 5	Class C Shrubland
Photo 11 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be flat/upslope.	
Plot 5	Class C Shrubland
Photo 12 This plot contains shrub and heath vegetation less than 2 m in height (height staff = 1m) The slope under this vegetation was assessed to be flat/upslope.	

Plot 6	Class G Grassland
Photo 13 This plot contains open paddocks with unmanaged grassland exceeding 100mm in height. The slope under this vegetation was assessed to be downslope > 0 - 5 degrees.	
Plot 7	Class G Grassland
Photo 14 This plot contains open paddocks with unmanaged grassland exceeding 100mm in height. The slope under this vegetation was assessed to be flat/upslope.	
Plot 7	Class G Grassland
Photo 15 This plot contains open paddocks with unmanaged grassland exceeding 100mm in height. The slope under this vegetation was assessed to be flat/upslope.	

Plot 8	Excluded - clause 2.2.3.2 (e)
Photo 16 Salt lake devoid of vegetation. Non-vegetated areas have been excluded in accordance with Clause 2.2.3.2 (e) of AS 3959: 2018.	
Plot 8	Excluded - clause 2.2.3.2 (e)
Photo 17 Gravel access road devoid of vegetation. Non-vegetated areas have been excluded in accordance with Clause 2.2.3.2 (e) of AS 3959: 2018.	
Plot 8	Excluded - clause 2.2.3.2 (e)
Photo 18 Bitumen public road devoid of vegetation Non-vegetated areas have been excluded in accordance with Clause 2.2.3.2 (e) of AS 3959: 2018.	

Appendix B:

Asset Protection Zone

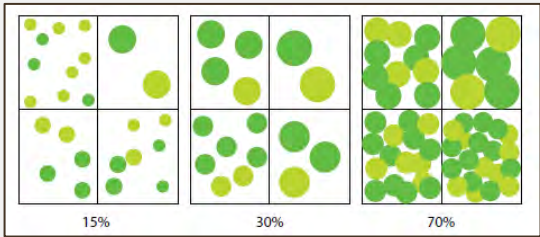
Technical Requirements

The following standards have been extracted from the Planning for Bushfire Guidelines (WAPC, 2024b).

Every habitable building is to be surrounded by, and every proposed lot can achieve, an APZ depicted on submitted plans, which meets the following requirements:

- a. Width: the APZ is measured from the development site, and of sufficient size to ensure the radiant heat impact of a bushfire does not exceed 29kW/m² (BAL-29) in all circumstances.
- b. Location: the APZ should be contained solely within the boundaries of the lot, except in instances where:
 - o the vegetation on the adjoining lot(s) is, and will continue to be, low threat as per Clause 2.2.3.2 of AS 3959 or the APZ technical requirements, or an alternative standard on a local planning scheme, on an ongoing basis in perpetuity; or
 - o the adjoining land is and will remain in perpetuity, non-vegetated.
- c. Management: the APZ is managed in accordance with the APZ technical requirements (below), or an alternative standard in a gazetted local planning scheme.

APZ Technical Requirements

Object	Requirement
Fences within the APZ	Should be constructed from non-combustible materials (for example, iron, brick, limestone, metal post and wire, or bushfire-resisting timber referenced in Appendix F of AS 3959).
Fine fuel load (Combustible, dead vegetation matter less than 6 mm in thickness)	• Should be managed and removed on a regular basis to be maintained as a low threat vegetation. • Should be maintained at less than two tonnes per hectare (on average). • Mulches should be non-combustible such as stone, gravel, shells, rock or crushed mineral earth or wood mulch more than five millimetres in thickness.
Trees* (more than 6 m in height)	• Trunks at maturity should be a minimum distance of six metres from all elevations of the building. • Branches at maturity should not touch or overhang a building or powerline. • Lower branches and loose bark should be removed to a height of two metres above the ground and/or surface vegetation. • Canopy cover within the APZ should be less than 15 per cent of the total APZ area. • Tree canopies at maturity should be at least 5 m apart to avoid forming a continuous canopy. Stands of existing mature trees with interlocking canopies may be treated as an individual canopy provided the total canopy cover within the APZ does not exceed 15 per cent and is not connected to the tree canopy outside the APZ.  Tree canopy cover – ranging from 15 to 70 per cent at maturity

Object	Requirement
Shrub* and scrub* (0.5 m to 6 m in height). Shrub and scrub more than 6 m in height are to be treated as trees.	• Should not be located under trees or within three metres of buildings. • Should not be planted in clumps more than five square metres in area. • Clumps should be separated from each other and any exposed window or door by at least 10 metres.
Ground cover* (less than 0.5 m in height. Ground cover more than 0.5 m in height is to be treated as shrub)	• Can be planted under trees but must be maintained to remove dead plant material, as prescribed in 'Fine fuel load' above • Can be located within two metres of a structure but three metres from windows or doors if more than 100 mm in height.
Grass	• Grass should be maintained at a height of 100 mm or less, at all times • Wherever possible, perennial grasses should be used and well-hydrated with regular application of wetting agents and efficient irrigation.
Defendable space	Within three metres of each wall or supporting post of a habitable building; the area is kept free from vegetation but can include ground cover, grass and non-combustible mulches as prescribed above.
Liquid petroleum gas cylinders	• Should be located on the side of a building farthest from the likely direction of a bushfire or on the side of a building where surrounding classified vegetation is upslope, at least one metre from vulnerable parts of a building. • The pressure relief valve should point away from the house. • No flammable material within six metres from the front of the valve. • Must sit on a firm, level and non-combustible base and be secured to a solid structure.

** Plant flammability, landscaping design and maintenance should be considered - refer to explanatory notes in the Guidelines.*

ADDITIONAL NOTES

An Asset Protection Zone (APZ) is a low fuel area, maintained around a building to increase the likelihood a building will survive a bushfire, by reducing the potential for direct flame contact, radiant heat exposure and ember attack. The APZ allows emergency services access and provides an area for firefighters and homeowners to defend their property.

An APZ should be contained within the boundaries of the lot on which the building is situated, except in instances where it is demonstrated the vegetation on the adjoining land is, and will continue to be, low threat as per cl. 2.2.3.2 of AS 3959, or the vegetation on the adjoining lot is, and will remain in perpetuity, non-vegetated. However, it should be noted there is no requirement for a neighbouring landowner or land manager (public or private) to be party to a legal agreement to undertake ongoing management of vegetation as low threat, in perpetuity.

Appendix C:

Method 2 BAL Calculations



Calculated February 23, 2026, 2:13 pm (MDC v.4.9)

Plot 1

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Fire Danger Index	80	Rate of spread	2.4 km/h
Vegetation Classification	Forest	Flame length	19.8 m
Understorey fuel load	25 t/ha	Flame angle	52 ° , 61 ° , 69 ° , 73 ° , 74 ° & 81 °
Total fuel load	35 t/ha	Elevation of receiver	7.8 m, 8.65 m, 9.24 m, 9.460000000000001 m, 9.51 m & 9.77 m
Vegetation height	n/a	Fire intensity	43,400 kW/m
Effective slope	0 °	Transmissivity	0.863, 0.841, 0.8110000000000001, 0.786, 0.773 & 0.716
Site slope	0 °	Viewfactor	0.6085, 0.4531, 0.3066, 0.2086, 0.1696 & 0.0458
Flame width	100 m	Minimum distance to < 40 kW/m²	16.1 m
Windspeed	n/a	Minimum distance to < 29 kW/m²	21.5 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	30.6 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	41.9 m
		Minimum distance to < 10 kW/m²	48.9 m

Rate of Spread - Mcarthur, 1973 & Noble et al., 1980

Flame length - NSW Rural Fire Service, 2001 & Noble et al., 1980

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Calculated February 23, 2026, 2:17 pm (MDC v.4.9)

Plot 2

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Fire Danger Index	80	Rate of spread	5.88 km/h
Vegetation Classification	Scrub	Flame length	13.62 m
Understorey fuel load	25 t/ha	Flame angle	53 °, 63 °, 71 °, 75 °, 77 ° & 83 °
Total fuel load	25 t/ha	Elevation of receiver	5.44 m, 6.07 m, 6.44 m, 6.58 m, 6.63 m & 6.76 m
Vegetation height	m	Fire intensity	75,987 kW/m
Effective slope	5 °	Transmissivity	0.874, 0.856, 0.831, 0.805, 0.792 & 0.729
Site slope	0 °	Viewfactor	0.5967, 0.4425, 0.2996, 0.2032, 0.1656 & 0.045
Flame width	100 m	Minimum distance to < 40 kW/m²	11.3 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	15.2 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	22.2 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	31.4 m
		Minimum distance to < 10 kW/m²	37.2 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Calculated February 23, 2026, 2:18 pm (MDC v.4.9)

Plot 3

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Fire Danger Index	80	Rate of spread	4.16 km/h
Vegetation Classification	Scrub	Flame length	11.62 m
Understorey fuel load	25 t/ha	Flame angle	53 °, 63 °, 72 °, 76 °, 78 ° & 83 °
Total fuel load	25 t/ha	Elevation of receiver	4.64 m, 5.18 m, 5.52 m, 5.64 m, 5.68 m & 5.77 m
Vegetation height	m	Fire intensity	53,815 kW/m
Effective slope	0 °	Transmissivity	0.878, 0.862, 0.838, 0.8139999999999999, 0.8 & 0.735
Site slope	0 °	Viewfactor	0.5988, 0.4419, 0.2962, 0.2016, 0.1638 & 0.0446
Flame width	100 m	Minimum distance to < 40 kW/m²	9.6 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	13 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	19.3 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	27.5 m
		Minimum distance to < 10 kW/m²	32.9 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Hi, Mr Dylan Wray

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Calculated February 23, 2026, 2:15 pm (MDC v.4.9)

Plot 4

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Fire Danger Index	80	Rate of spread	4.04 km/h
Vegetation Classification	Shrubland	Flame length	9.07 m
Understorey fuel load	15 t/ha	Flame angle	54 ° , 64 ° , 72 ° , 77 ° , 79 ° & 84 °
Total fuel load	15 t/ha	Elevation of receiver	3.66 m, 4.07 m, 4.31 m, 4.41 m, 4.45 m & 4.51 m
Vegetation height	m	Fire intensity	31,357 kW/m
Effective slope	5 °	Transmissivity	0.883, 0.869, 0.85, 0.827, 0.8139999999999999 & 0.744
Site slope	0 °	Viewfactor	0.5886, 0.4351, 0.2938, 0.1977, 0.1609 & 0.0441
Flame width	100 m	Minimum distance to < 40 kW/m²	7.6 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	10.3 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	15.2 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	22.3 m
		Minimum distance to < 10 kW/m²	26.9 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Calculated February 23, 2026, 2:16 pm (MDc v.4.9)

Plot 5

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Fire Danger Index	80	Rate of spread	2.86 km/h
Vegetation Classification	Shrubland	Flame length	7.73 m
Understorey fuel load	15 t/ha	Flame angle	54 °, 64 °, 73 °, 78 °, 80 ° & 85 °
Total fuel load	15 t/ha	Elevation of receiver	3.13 m, 3.47 m, 3.7 m, 3.78 m, 3.81 m & 3.85 m
Vegetation height	m	Fire intensity	22,207 kW/m
Effective slope	0 °	Transmissivity	0.886, 0.874, 0.856, 0.835, 0.823 & 0.75
Site slope	0 °	Viewfactor	0.5861, 0.4341, 0.2914, 0.1967, 0.1593 & 0.0437
Flame width	100 m	Minimum distance to < 40 kW/m²	6.5 m
Windspeed	45 km/h	Minimum distance to < 29 kW/m²	8.800000000000001 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	13.1 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	19.3 m
		Minimum distance to < 10 kW/m²	23.5 m

Rate of Spread - Catchpole et al. 1998

Flame length - Byram, 1959

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Calculated February 23, 2026, 2:18 pm (MDc v.4.9)

Plot 6

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Grassland Fire Danger Index	110	Rate of spread	20.19 km/h
Vegetation Classification	Grassland	Flame length	8.16 m
Understorey fuel load	4.5 t/ha	Flame angle	54 °, 64 °, 73 °, 78 °, 80 ° & 85 °
Total fuel load	4.5 t/ha	Elevation of receiver	3.3 m, 3.67 m, 3.9 m, 3.99 m, 4.02 m & 4.06 m
Vegetation height	n/a	Fire intensity	46,945 kW/m
Effective slope	5 °	Transmissivity	0.885, 0.872, 0.854, 0.832, 0.82 & 0.748
Site slope	0 °	Viewfactor	0.5915, 0.4337, 0.2918, 0.1968, 0.1599 & 0.0438
Flame width	100 m	Minimum distance to < 40 kW/m²	6.8 m
Windspeed	n/a	Minimum distance to < 29 kW/m²	9.300000000000001 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	13.8 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	20.3 m
		Minimum distance to < 10 kW/m²	24.6 m

Rate of Spread - Noble et al. 1980

Flame length - Purton, 1982

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005



Calculated February 23, 2026, 2:19 pm (MDc v.4.9)

Plot 7

Minimum Distance Calculator - AS3959-2018 (Method 2)

Inputs		Outputs	
Grassland Fire Danger Index	110	Rate of spread	14.3 km/h
Vegetation Classification	Grassland	Flame length	6.87 m
Understorey fuel load	4.5 t/ha	Flame angle	54 ° , 64 ° , 73 ° , 78 ° , 80 ° & 85 °
Total fuel load	4.5 t/ha	Elevation of receiver	2.78 m, 3.08 m, 3.28 m, 3.36 m, 3.38 m & 3.42 m
Vegetation height	n/a	Fire intensity	33,247 kW/m
Effective slope	0 °	Transmissivity	0.887, 0.877, 0.861, 0.841, 0.829 & 0.755
Site slope	0 °	Viewfactor	0.5823, 0.4291, 0.29, 0.1946, 0.158 & 0.0434
Flame width	100 m	Minimum distance to < 40 kW/m²	5.8 m
Windspeed	n/a	Minimum distance to < 29 kW/m²	7.9 m
Heat of combustion	18,600 kJ/kg	Minimum distance to < 19 kW/m²	11.7 m
Flame temperature	1,090 K	Minimum distance to < 12.5 kW/m²	17.3 m
		Minimum distance to < 10 kW/m²	21.2 m

Rate of Spread - Noble et al. 1980

Flame length - Purton, 1982

Elevation of receiver - Douglas & Tan, 2005

Flame angle - Douglas & Tan, 2005

Radiant heat flux - Drysdale, 1999, Sullivan et al., 2003, Douglas & Tan, 2005

Appendix D:

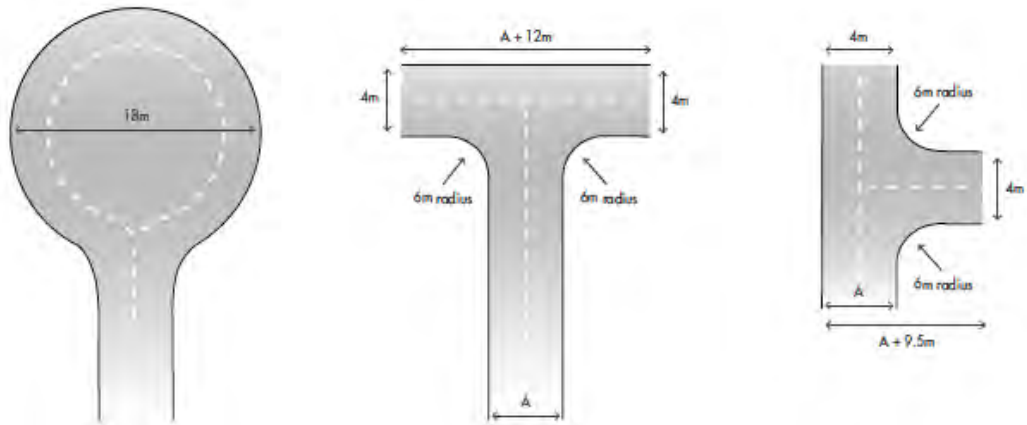
Vehicular Access Technical

Requirements

Technical requirements	Perimeter Roads		Public Roads		Emergency Access Way ³		Fire Service Access Route ³		Battle-Axe and Private Driveways ¹	
Map of Bush Fire Prone Areas Designation	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1
Minimum horizontal clearance (m)	12	8	See note 5		10	6	10	6	6	
Minimum vertical clearance (m)	4.5									
Minimum weight capacity (t)	15									
Maximum grade unsealed road ²	See note 5		See note 5		1:10 (10% or 6 degrees)					
1:7 (14.3% or 8 degrees)										
1:10 (10% or 6 degrees)										
8.5										

ADDITIONAL NOTES

1. Driveways and battle-axe legs to comply with the Residential Design Codes and Development Control Policy 2.2 Residential Subdivision where not required to comply with the widths in this Appendix or the Guidelines.
2. Dips must have no more than a 1 in 8 (12.5% - 7.1 degrees) entry and exit angle.
3. To have crossfalls between 3 per cent and 6 per cent.
4. For sealed roads only the maximum grade of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50 metres is permissible, except for short constrictions to 3.5 metres for no more than 30 metres in length where an obstruction cannot be reasonably avoided or removed.
5. As outlined in the Institute of Public Works Engineering Australasia (IPWEA) subdivision guidelines, Liveable Neighbourhoods, Austroads Standards Main Roads standard, supplement, policy or guideline and/or any applicable or relevant local government standard or policy.



Design requirements for a turnaround area

Appendix E:

CFA Design Guidelines Assessment

Background

New and emerging renewable energy technology has outpaced the development of fire and emergency management standards and guidance, especially in Western Australia. The State Government has identified the need for a comprehensive bushfire assessment framework specific to renewable energy facilities however this is yet to be developed to cover solar facilities. In the absence of a Western Australian assessment framework, the Country Fire Authority (CFA) *Design Guidelines and Model Requirements for Renewable Energy Facilities Version 4* (CFA Design Guidelines; State of Victoria 2023) is considered best practice for the assessment of renewable energy facilities in designated bushfire prone areas.

The bushfire prone solar modules and PCS units have been assessed against the requirements of the CFA Design Guidelines tailored to the Western Australian planning system as documented below.

Consultation

The use of the CFA Design Guidelines is generally supported based on previous discussions with the Department of Planning, Lands and Heritage (DPLH) and the Department of Fire and Emergency Services (DFES).

Fire Risk Management

The CFA Design Guidelines require a Risk Management Plan to be developed for all renewable energy facilities. A Risk Management Plan will be prepared by the proponent prior to the commencement of operations of the proposed solar facility.

Facility Location

The proposed development is located on grazed paddocks which is considered suitable in accordance with the CFA Design Guidelines. However, the subject site is still considered a high-risk environment given portions of the subject site are designated as bushfire prone. Renewable energy facilities proposed in high-risk environments must address the following:

- An assessment against the relevant policy, in this case SPP 3.7 and the associated Guidelines.
- The impact of any ignitions arising from renewable energy facility on nearby communities, infrastructure and assets.
- The impact of bushfire on the renewable energy facility (e.g. ember attack, radiant heat impact and flame contact).
- Assessment of whether the proposed development will lead to an increase in risk to adjacent land and how the proposal will reduce risks on site to an acceptable level.

The above requirements have been appropriately addressed through the preparation of the BMP and the below assessment against the requirements of the CFA Design Guidelines.

WEPL is not aware of peat soils within 10 m of the proposed infrastructure.

Facility Design

Emergency Vehicle Access

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Construction of a four (4) metre perimeter road within the perimeter fire break.	✓	A 4m wide perimeter road will be constructed along the edge of the subject site. The location of the perimeter road will align with firebreak requirements under the Shire of Three Springs Firebreak Notice.
Roads must be of all-weather construction and capable of accommodating a vehicle of 15 tonnes.	✓	Internal access roads will be constructed of an all-weather surface material and designed to accommodate a 15-tonne vehicle.
Constructed roads should be a minimum of four (4) metres in trafficable width with a four (4) metre vertical clearance for the width of the formed road surface.	✓	All internal access roads will be a minimum 4m in width constructed of an all-weather surface material. A 4.5m vertical clearance will be maintained at all times.
The average grade should be no more than 1 in 7 (14.4% or 8.1°) with a maximum of no more than 1 in 5 (20% or 11.3°) for no more than 50 metres.	✓	Finished ground levels will be determined during detailed design stage. Road grades will be designed to adhere to the relevant requirements of the Guidelines (WAPC, 2024b).
Dips in the road should have no more than a 1 in 8 (12.5% or 7.1°) entry and exit angle.	✓	Finished ground levels will be determined during detailed design stage. Road grades will be designed to adhere to the relevant requirements of the Guidelines (WAPC, 2024b).
Roads must incorporate passing bays at least every 600m, which must be at least 20 metres long and have a minimum trafficable width of six (6) metres. At least one passing bay must be incorporated where roads are less than 600 metres long.	✓	The internal access roads will allow vehicles to pass by either designing the roads for two-way access or providing passing bays every 200m, as per the Guidelines (WAPC, 2024b).
Road networks must enable responding emergency services to access all areas of the facility, including fire service infrastructure, buildings, BESS and related infrastructure, substations and grid connection areas.	✓	The existing public road network provides adequate access for emergency vehicles. The northern development area on Lot 201 will be accessed via an entrance along Geebulla Road and the southern development area on Lot 25 will be accessed via an entrance along Perenjori-Three Springs Road. Both are existing public roads with a minimum width of 6m for two-way access.

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
		The internal private road network will provide access to the switchyard, inverters and along the perimeter of the solar modules.
Provision of at least two (2) but preferably more access points to each part of the facility. The number of access points must be informed through a risk management process.	✓	The proposed development includes two (2) access points to the public road network.

Firefighting Water Supply

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Water access points must be clearly identifiable and unobstructed to ensure efficient access.	✓	Water tanks will be provided on site for the storage of static water for firefighting purposes. Water access points will be clearly identifiable through signage. All water tanks will be located for ease of access and will remain unobstructed. The exact location of water tanks will be determined at detailed design stage.
Static water storage tank installations must comply with AS 2419.1-2021: Fire hydrant installations – System design, installation and commissioning.	✓	The static water storage tanks will be designed in accordance with AS 2419.1-2021. This will be documented at detailed design stage.
The static water storage tank(s) must be an above-ground water tank constructed of concrete or steel.	✓	The static water storage tanks will be above ground and constructed from concrete or steel.
The static water storage tank(s) must be capable of being completely refilled automatically or manually within 24 hours.	✓	The static water storage tanks will be refilled within 24 hours either automatically via a groundwater bore or manually through a local water supply contractor. This will be documented at detailed design stage.
The static water storage tanks must be located at vehicle access points to the facility and must be positioned at least ten (10) metres from any infrastructure (solar panels, wind turbines, battery energy storage systems, etc.).	✓	The static water storage tanks will be located at both entrances and setback a minimum 10m from the infrastructure. The exact location of water tanks will be determined at detailed design stage.
The hard-suction point must be provided, with a 150mm full bore isolation valve equipped with a Storz connection, sized to comply with the required suction hydraulic performance.	✓	The static water storage system is subject to detailed design however it is expected that each tank will be fitted with the required connection valves and adapters, including a Storz connection.
The hard-suction point must be positioned within four (4) metres to a hardstand area and provide a clear access for emergency services personnel.	✓	The static water storage tanks and connection points will be located within 4m of the internal access roads for ease of access. This will be documented at detailed design stage.

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
An all-weather road access and hardstand must be provided to the hard-suction point. The hardstand must be maintained to a minimum of 15 tonne GVM, 15m long and 6m wide, in accordance with GL-11: DFES Site Planning and Fire Appliance Specifications.	✓	All weather surface access roads will be provided to the water connection points for fire service access. The access roads will be designed to DFES specifications, including minimum 15 tonne GVM, 15m in length and 6m wide. This will be documented at detailed design stage.
The road access and hardstand must be kept clear at all times.	✓	The internal roads and hardstands will be kept clear at all times through an ongoing maintenance regime.
The hard-suction point must be protected from mechanical damage (e.g. bollards) where necessary.	✓	The static water supply system is subject to detailed design. It is likely that bollards will be installed to protect the water connection points from damage.
Where the access road has one entrance, an eight (8) metre radius turning circle must be provided at the tank.	✓	The internal road layout will be determined at detailed design stage. Turnaround areas in accordance with the Guidelines (WAPC, 2024b) will be provided should dead-end internal access roads be provided.
An external water level indicator must be provided to the tank and be visible from the hardstand area.	✓	All static water storage tanks will be fitted with a level indicator, visible from the hardstand area or adjacent access road. This will be documented at detailed design stage.
Signage indicating 'FIRE WATER' and the tank capacity must be fixed to each tank.	✓	Signage will be installed on each static water storage tank.
Signage must be provided at each vehicle entrance to the facility, indicating the direction to the nearest static water tank(s).	✓	Signage will be installed at the main entrance to the solar facility.
The fire protection system for solar energy facilities must incorporate at least one (1) x 45,000L static fire water tank at the primary vehicle entrance to each part of the facility. Additional static fire water tanks of at least 45,000L effective capacity must also be incorporated for every 100ha.	✓	The proposed development will provide the following static fire water tanks: • One (1) 45,000L static fire water tank at each entry point - two (2) water tanks required; and • One (1) 45,000 litre static fire water tank for every 100ha - three (3) additional water tanks required. The exact location of water tanks will be determined at detailed design stage.
The battery storage system attached to each inverter requires a 45,000L static fire water tank within 120 m of each inverter.	N/A	Not applicable - the proposed BESS is not bushfire prone.

Fire Detection and Suppression Equipment

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Suitable fire detection and suppression equipment must be provided: - For on-site buildings and structures, according to the requirements of the National Construction Code (NCC). - For storage of dangerous goods, according to the requirements of any Australian Standards for storing and handling dangerous goods. - For electrical installations, a minimum of two (2) suitable fire extinguishers must be provided within 3m - 20m of each Power Conversion Unit. - In all vehicles and heavy equipment, each vehicles must carry at least a nine (9) litre water stored pressure fire extinguisher with a minimum rating of 3A, or other firefighting equipment as a minimum when on-site during the Fire Danger Period.	✓	Fire detection and suppression equipment will be provided in accordance with the relevant legislation. Fire extinguishers will be installed adjacent the inverters and switchyard. All authorised vehicles will be required to carry a fire extinguisher which will be confirmed during site inductions as part of the operational management plan.

Landscape Screening and On-Site Vegetation

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Any proposed or existing vegetation must be considered in the BMP for its potential to intensify and propagate fire within any away from the site.	✓	The BMP considers all existing and proposed vegetation within 150m of the subject site.
Where landscape screening is required, for example, to screen visual impacts, the design must consider any potential increase in fire risk due to the type (species), density, height, location and overall width of the screening.	✓	Areas of retained vegetation has been considered in the BMP.
Facilities must be designed so that the radiant heat flux (output) from vegetation does not create the potential for ignition of on-site infrastructure or other vegetation.	✓	APZs will be established to ensure the radiant heat flux from retained vegetation does not create the potential for ignition of on-site infrastructure or other vegetation. This includes high-risk assets being located to ensure the radiant heat flux does not exceed at 10kW/m ² , as detailed in the BMP.
Radiant heat impact leading to ignition may be mitigated through: - Vegetation removal (where permitted). - Separation from nearby infrastructure (e.g., fire breaks; refer below).	✓	The radiant heat impact has been reduced through the establishment of APZs to maintain separation between infrastructure and retained vegetation.

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
The provision of thermal barriers at nearby infrastructure.		
Substations should be surfaced to eliminate all vegetation, including grasses.	N/A	Not applicable - the proposed substation is not bushfire prone.
The Electricity Regulations 1947 and Code of Practice for Personnel Electrical Safety for Vegetation Control Work Near Live Powerlines prescribe vegetation clearance requirements for electric lines based on voltage.	✓	Vegetation within proximity to power lines will be managed in accordance with the relevant regulations and codes of practice.

Firebreaks

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
A firebreak must be established and maintained around the perimeter of the facility, commencing from the boundary or from the vegetation screening inside the property boundary.	✓	A perimeter firebreak will be maintained around the subject site in accordance with the Shire of Three Springs Firebreak Notice.
A firebreak must be established and maintained around the perimeter of controls rooms, electricity compounds, substations and all other buildings onsite.	✓	The PCS units will be surrounded by non-vegetated access tracks.
The width of fire breaks must be a minimum of 10m, and at least the distance where radiant heat flux (output) from the vegetation does not create the potential for ignition of on-site infrastructure.	✓	A perimeter firebreak will be maintained around the subject site in accordance with the Shire of Three Springs Firebreak Notice.

Design Specific to Facility Type

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Solar energy facilities are to have a minimum 6m separation between solar panel banks.	TBC	To be confirmed at detailed design stage.
Battery storage systems shall be separated from adjacent solar panel banks to reduce the potential for ignition of the adjacent infrastructure.	N/A	Not applicable - the proposed BESS is not bushfire prone.

Facility Construction and Commissioning

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Install and commission fire detection and suppression for the facility at the earliest possible stage of construction.	TBC	A construction programme is yet to be prepared for the project.
Provide first-aid firefighting equipment, such as fire extinguishers (and where possible, portable fire hose reels), appropriate to the identified emergency scenarios, at all construction portables / buildings onsite, in the vicinity of all construction activities, and in site-based vehicles.	✓	Transportable buildings used during the construction phase of the project will include first-aid firefighting equipment.
Provide the required fire protection equipment for any storage of dangerous goods as per the relevant Australian Standards.	✓	Fire protection equipment will be provided in accordance with the relevant standards for the storage of dangerous goods (if applicable).
Obtain appropriate permits for work during the restricted and prohibited burning periods and ensure that any conditions on the permits are adhered to.	✓	The proponent will be responsible for obtaining any necessary permits during restricted burn periods.
Adhere to restrictions on Total Fire Ban or days of elevated fire danger according to Emergency WA website.	✓	The proponent will adhere to the restrictions of Total Fire Ban days.
During the restricted and prohibited burning periods, ensure vehicle operators are instructed to remain on tracks and are not permitted to drive through paddocks.	✓	Vehicles will only be permitted on designated access roads during restricted and prohibited burning periods.
Restrict smoking to prescribed areas and provide suitable ash and butt disposal facilities.	✓	Smoking will be restricted to a prescribed area, away from all fire hazards.
Provide remotely accessible site/system security monitoring at the facility.	✓	Security cameras will be installed to enable remote monitoring of the site.
Provide training for personnel in the use of on-site first aid firefighting equipment, and responsibilities during emergencies.	✓	Personnel nominated as part of the emergency response team will be required to undertake first aid and firefighting equipment training.
Develop an Emergency Plan for the construction and commissioning phase of the project.	✓	A construction management plan will be developed for the project which will include emergency procedures during the construction and commissioning phase of the project.
Provide an emergency communication system that is reliable and will operate in the event of power failure.	✓	All vehicles will be fitted with two-way radios to enable communication during an emergency. Mobile phone reception is also available at the site.

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
Notify DFES at least seven days prior to the commissioning of any high-risk infrastructure at the facility (e.g. switchyard and inverters).	✓	DFES will be notified prior to commissioning the PCS units.
Develop safe work procedures for the facility, including but not limited to: • Electricity and chemical management. • Vegetation management. • Site security. • Ignition source control, including hot works. • Infrastructure, equipment and vehicle maintenance. • Emergency management.	✓	The proponent will develop an operational management plan which will include safe work procedures for the facility.

Facility Operation

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
A BMP must be developed for the facility, in consultation with DFES, before development starts.	✓	A BMP has been prepared generally in accordance with SPP 3.7 and the Guidelines. The BMP will likely be referred to DFES as part of the assessment process.
Undertake bushfire prevention and preparedness activities.	✓	An emergency plan will be prepared which will outline bushfire prevention and preparedness activities. In addition, bushfire prevention and preparedness activities will be undertaken in accordance with the Shire of Three Springs Firebreak Notice.
Facility operators must undertake the following measures: • Grass must be maintained at or below 100mm in height. • Long grass and/or deep leaf litter must not be present in areas where heavy equipment will be working, during construction or operation. • Restrictions and guidance must be adhered to during days of high (and above) fire danger or Total Fire Ban days.	✓	All grass within the APZs will be maintained at or below 100mm and leaf litter will be removed on a regular basis.
Appropriate monitoring for facility infrastructure must be provided to ensure that any shorts, faults or equipment failures with the potential to ignite or propagate fire are rapidly identified and controlled.	✓	The facility will be subject to routine monitoring to identify any shorts, faults or equipment failures. The monitoring regime will be detailed in the operational management plan.
Inspection, maintenance and any required repair activities must be conducted for all infrastructure, equipment and vehicles at the	✓	Inspection, maintenance and repairs will be undertaken in accordance with the relevant

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
facility. Maintenance must be in line with any relevant Australian Standards and manufacturers requirements.		Australian Standards and manufacturers requirements.

Emergency Planning

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
An Emergency Plan must be developed specific to the facility before the development starts.	✓	An emergency plan will be prepared and approved prior to operation of the development.
The Emergency Plan should be developed in accordance with AS 3745-2010: Planning for emergencies in facilities and include the following: • Emergency prevention, preparedness and mitigation activities. • Activities for preparing for emergencies. • Control and coordination arrangements for emergency response (e.g. Evacuation procedures, shelter-in-place arrangements, emergency assembly areas and emergency response procedures). • The agreed roles and responsibilities of on-site personnel (e.g. equipment isolation, fire brigade liaison, evacuation management, shelter-in-place management, if applicable).	✓	The emergency plan will be developed in accordance with AS 3745-2010 and any other relevant guidelines.
The Emergency Plan for a solar facility should also include: • Emergency procedures for isolation and shutdown where solar panels and/or related infrastructure are involved in fire. • Emergency procedures for fires within the vicinity of solar energy facilities. • Specifications for safe operating conditions for temperature, and the hazards related to electricity generation at the facility.	✓	The emergency plan will be prepared in consultation with the relevant experts, taking into consideration the hazards identified in the risk assessment.

Provision of Emergency Information

CFA Design Guideline Requirements (Adapted to WA)	Compliance can be achieved	Compliance comments
An Emergency Information Book must be developed and available to emergency responders. Emergency Information Books must be located in Emergency Information Containers, provided at each vehicle entrance.	✓	The proponent will be responsible for preparing emergency information which are to be provided at the main entrance to the BESS facility.

From: ATCO Engineering Enquiries <eservices@atco.com>

Sent: Thursday, 16 April 2026 2:34 PM

To: <es@threesprings.wa.gov.au>

Subject: ATCO Response - LM02016938 - Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

Good Afternoon,

Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

ATCO Reference: LM02016938

ATCO Gas Australia (ATCO) has **no objection** to the proposed application, based on the information and plan provided.

Advice notes:

- Anyone proposing to carry out construction or excavation works must contact 'Before You Dig Australia' (www.byda.com.au) to determine the location of buried gas infrastructure. Refer to ATCO document AGA-O&M-PR24- Additional Information for Working Around Gas Infrastructure <https://gas.atco.com/en-au/natural-gas/wa-gas-network/working-around-gas-infrastructure.html>
- Proposed construction and excavation works need to be managed in accordance with the ATCO document Additional Information for Working Around Gas Infrastructure - AGA-O&M-PR24 <https://gas.atco.com/en-au/natural-gas/wa-gas-network/working-around-gas-infrastructure.html>

Please accept this email as ATCO's written response.

Should you have any queries regarding the information above, please contact us on 13 13 56 or eservices@atco.com.

Kind Regards

Kim Hatcher

Land Liaison/Engineering Coordinator
ATCO, Gas Division, Australia

A. 81 Prinsep Road, Jandakot, Western Australia, 6164

ATCO.com.au [LinkedIn](#) [Facebook](#) [X](#)



ATCO acknowledges Aboriginal people as the Traditional Custodians of country throughout Australia including Torres Strait Islander peoples.

From: strategic.planning.referrals@westernpower.com.au

Sent: 21 April 2026 5:13 PM

Subject: Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) No. 3024 (Lot 201) Perenjori-Three Springs Rd & No. 17112 (Lot 25) Midlands Rd, Womarden

Dear Shire of Three Springs

Thank you for the opportunity for Western Power to review and comment on the RDAP development application - Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) No. 3024 (Lot 201) Perenjori-Three Springs Rd & No. 17112 (Lot 25) Midlands Rd, Womarden.

Western Power supports the development application and confirms that the subject project is currently being assessed for completeness and connection processing. However, Western Power recommends that the proponent shall ensure that the connection points, location, design, access and ongoing maintenance and operations of assets is supported and agreed with Western Power.

Western Power further recommends the following Condition and Advice Notes prior to development, pursuant to Section 167 of the *Planning and Development Act 2005*:

Condition:

1. Prior to development, arrangements shall be made for the provision of an easement pursuant to Section 167 of the Planning and Development Act 2005 for existing or planned Western Power distribution and transmission infrastructure being granted free of cost to Western Power.

Advice Notes:

(i) The development shall be designed and constructed to protect Western Power infrastructure and interests from potential land use conflict.

(ii) No development (including drainage, fill, fencing, storage or parking) will be permitted within Western Power line and cable easements or restriction zones without the prior written approval of Western Power.

(iii) The applicant should continue to formally progress the Western Power network connection and substation arrangements with Western Power.

(iv) Arrangements being made to the specifications of Western Power for the provision of necessary electricity easements as required.

Should you wish to discuss the above matter further, please contact Doreen Rowley on Doreen.Rowley@westernpower.com.au.

Kind regards,

Doreen Rowley

Land Use Planning Specialist

Social Performance & Approvals

A 95 William Street Perth 6000 | T (08) 9326 6634

E Doreen.Rowley@westernpower.com.au



Your Ref: OCR267251
Our Ref: F-AA-90523-8 EDOC26/149278
Contact: Vic Andrich 9222 2000

Mr Keith Woodward
Chief Executive Officer
Shire of Three Springs
132 Railway Road
THREE SPRINGS WA 6519

Attention: Simon Lancaster

Via email: general@threesprings.wa.gov.au

Dear Mr Woodward

RENEWABLE ENERGY FACILITY (SOLAR FARM & BATTERY ENERGY STORAGE SYSTEM) UPON 3024 (LOT 201) PERENJORI-THREE SPRINGS ROAD, WOMARDEN & 17112 (LOT 25) MIDLANDS ROAD, WOMARDEN.

Thank you for your letter dated 17 April 2026, requesting comment from the Department of Health (DoH) on the above proposal.

The DoH provides the following comment which is in addition to advice provided by your local environmental health services in relation to this proposal.

Summary and site context :

The subject site is in the suburb of Womarden, approximately 3.2 kilometres north-east of the Three Springs townsite. The development is located within existing cleared cropping land on the central western portion of Lots 201 and 25, adjoining Perenjori-Three Springs Road and Geebulla Road, and has a footprint area of 300 hectares. Surrounding land is zoned rural, with the closest sensitive receptor being a single rural property 1.3km to the north-east and other properties 2-3.2km to the south-west of the development (including the Three Springs townsite).

The proponent proposes the development and use of a solar farm and Battery Energy Storage System (BESS) on the subject site. The solar farm will have a 152.95 MW (AC) inverter/export capacity and a 191.19 MWp (DC) PV array peak output. The BESS has a 250MW power capacity and 2 GWh storage capacity, with a total of 350 battery containers.

DoH position

- ☐ No objection – no comments or advice to provide.
- ☒ No objection – with comments and/or recommended conditions and advice notes provided below.

□ Do not support – reasons provided below, i.e. additional reports, studies, plans or other information that should be provided to determine public health risk / legislative compliance.

DoH advice and recommended conditions

Note: State Planning Policy 2.9 – Water ([State Planning Policy 2.9 Water](#)) provides for specified site requirements for potable/drinking water supply, recreational water and wastewater disposal.

Infrastructure - Water supply and wastewater disposal

Any drinking water provided on site must meet the health-related requirements of the *Australian Drinking Water Guidelines 2011*.

Any non-drinking water (i.e. water that is not intended or suitable for drinking) must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration, suitable backflow prevention arrangements in accordance with AS/NZS 3500 Plumbing and Drainage.

If there is the disposal of wastewater generated on site and/or from workforce accommodation, it is required to comply with the *Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974* and State Planning Policy 2.9 – Water (SPP 2.9).

An 'Application to Construct or Install an Apparatus for the Treatment of Sewage' is required to be submitted to the Local Government for any wastewater treatment system. If this proposal is likely to generate more than 540L of wastewater per day, the application is required to be forwarded to the DoH for assessment and approval. Further information is available here - [Apply to install an on-site wastewater system](#)

The proponent will be required to provide the following in accordance with SPP 2.9 and the associated guidelines to ensure the protection of public health from wastewater generated at the premises:

- a) Site and Soil Evaluation (SSE) undertaken by a qualified consultant during the wettest seasonal time of the year (mid-July/August) as per AS/NZS 1547:2012 to ensure the land application area is located and sized appropriately.
- b) Detailed plans to scale showing the wastewater apparatus and disposal type. Plans also need to show the proposed building envelopes, proposed and existing onsite wastewater systems, all trafficable areas, parking bays and land application area/s including setback distances to winter creeks and exclusion/riparian zones with all measurements.

Any use of recycled water on site must be in accordance with the:

- *Health (Treatment of Sewage and Disposal of Effluent and Liquid Waste) Regulations 1974*,

- *Guidelines for the non-potable uses of recycled water in Western Australia* <https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/water/Recycling/Guidelines-for-the-Non-potable-Uses-of-Recycled-Water-in-WA.pdf> and
- *Code of Practice for the Reuse of Greywater in Western Australia 2010.* <https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/water/Wastewater/COP-Greywater-Reuse-2010.pdf>

Amenity – Medical entomology

The Shire of Three Springs require the proponent to ensure the proposed site works and infrastructure do not create additional mosquito breeding habitat as follows:

- Appropriate location, design and maintenance of project infrastructure to prevent mosquito breeding (e.g. wastewater, stormwater infrastructure);
- Changes to topography resulting from earthworks must prevent run-off from creating surface ponding as it may become mosquito breeding habitat;
- Water tanks and other water-holding containers must be sealed or screened to prevent mosquito access and breeding. Regular monitoring for mosquito larvae and treatment with larvicide may also be required.

Public Health, Emergency & Hazard Management

- Emergency incidents with LFP batteries can result in the generation of flammable gas, electrolyte leakage from damaged, failing or corroding batteries and/or explosion.

DoH recommends the development of a Hazard Assessment and Emergency Management Plan to address and scope smoke impacts, public health risks and immediate response actions arising from emergency incidents (i.e. a major fire, spill, or leak). Further information should be provided on risks and mitigation measures that will occur to prevent or minimise adverse public health outcomes.

- The Industry (Australian Energy Council Ltd) guideline (GHD, 12 September 2024) ([12591546-rep-1 bess-guidance-report-1-compiled.pdf](#)) identifies the absence of published default separation distances around BESS facilities as a significant knowledge gap, which prevents BESS operators from demonstrating suitable safe buffer distances.

To address the potential for health risks and impacts on amenity, the Department of Health supports the application of the EPA (2005) guideline “*Separation Distances between Industrial and Sensitive Land Uses*” which recommends that sound site specific technical analysis is undertaken to provide appropriate separation/buffer distances where they may be offsite impacts, including BESS infrastructure (Section 2.1 and 4.1). Whilst the emissions from BESS facilities are likely to be minimal under normal operating conditions, these facilities can contain hazardous materials which if ignited by fault or bushfire, may result in fire which may give rise to significant public health impacts.

- DoH recommends obtaining advice from relevant agencies with responsibility for regulation and policy development. In consideration of the impacts during potential

emergency events, including endorsement of Hazard Assessment and an Emergency Management Plan, further advice should be sought from the following Western Australian agencies:

- Department of Fire and Emergency Services
- Department of Local Government, Industry Regulation and Safety (Building and Energy Division, Dangerous Goods)
- Department of Energy and Economic Diversification (Energy Policy WA); and
- Department of Water and Environmental Regulation (Green Energy Approvals Directorate)

Suggested references

- Consider the findings from the Statement of Technical Findings from the '2021 Victorian Big Battery Fire'
[VBB StatementOfFindings FINAL 28Sep2021.pdf](#)
Full report: [Victorian Big Battery Fire: July 30, 2021](#)
- The Industry (Australian Energy Council Ltd) guideline (GHD, 12 September 2024) ([12591546-rep-1 bess-guidance-report-1-compiled.pdf](#))

Should you have any queries or require further information, please contact System Performance on 9222 2000 or eh.eSubmissions@health.wa.gov.au.

Yours sincerely



Peter Gray

**EXECUTIVE DIRECTOR
ENVIRONMENTAL HEALTH DIRECTORATE**

23 April 2026



Mark Dacombe
Temporary Chief Executive Officer
Shire of Three Springs
Sent by Email — general@threesprings.wa.gov.au
PO Box 117 Three Springs WA 6519

Submission 4

Dear Mark Dacombe

**SHIRE OF THREE SPRINGS - PROPOSED RENEWABLE ENERGY FACILITY
(SOLAR FARM & BATTERY ENERGY STORAGE SYSTEM) 3024 (LOT 201)
PERENJORI-THREE SPRINGS RD - 17112 (LOT 25) MIDLANDS RD WOMARDEN**

Thank you for your letter dated 20 April 2026 inviting comment on the proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) No 3024 (Lot 201) Perenjori, Three Springs Road and No 17112 (Lot 25) Midlands Road, Womarden in the Shire of Three Springs.

The Department of Mines, Petroleum and Exploration (DMPE) has assessed this proposal with respect to mineral and petroleum resources, geothermal energy, and basic raw materials and makes the following comments.

- From our records there is no impact on any known resources or BRM in this area.
- However, there are several tenements that are affected. The tenement holders have not been contacted as the impact of this development on exploration is considered to be low.
 - There is a 0.78% encroachment on granted E 70/5876 held by Century Minerals Pty Ltd; Empire Metals Australia Pty Ltd
 - There is a 48.32% encroachment on granted L 70/153 and there is a 2.58% encroachment on pending L 70/157 held by Extension Hill Pty Ltd.
 - There is a 0.21% encroachment on petroleum exploration permit EP 498 held by Southern Sky Energy Pty Ltd
- DMPE provides information on geology and mineral deposits in various [publications](#), State wide spatial datasets that can be downloaded free of charge from the [Data and Software Centre](#) or viewed interactively using [GeoView](#). Maps can be produced directly by using this software, or by downloading the digital data for use in GIS software.
- Information on Mining Act tenements and Petroleum and Geothermal Energy Resources Act titles is available from the DMPE website [Tengraph](#) and

[GeoView](#). It is recommended that these systems are referenced during your land-use planning studies.

- Of particular interest to DMPE are the two miscellaneous licence tenements, granted L 70/153 and pending L 70/157, both held by Extension Hill Pty Ltd. These tenements are designed as possible easements for powerlines and roads to connect to the Western Power electrical power substation on Lot 22.
- There is a potential synergy with power supply and the planned intention of the tenements to supply mining operations. Consultation maybe beneficial for efficient use of power supply from this proposal.

DMPE lodges no objections to the above development application.

Yours sincerely



Steven Batty | Senior Geologist
Resource Security Directorate
28 April 2026

Organisation EXTENSION HILL PTY LTD

Address C/- AUSTWIDE MINING TITLE MANAGEMENT PTY LTD, PO BOX 1434,
WANGARA, WA, 6947

Email reception@austwidemining.com.au

Telephone (08) 9309 0400



Enquiries: Anthony Williams 9956 1261
Our Ref: 002-594 in 20/6687
Your Ref: Email

30 April 2026

Shire of Three Springs
ATT: Simon Lancaster
132 Railway Road
Three Springs, W.A. 6519

Email: dceo@chapmanvalley.wa.gov.au

Dear Simon,

PROPOSED RENEWABLE ENERGY AND STORAGE FACILITY (PROGRESSIVE GREEN SOLUTIONS) LOT 201 PERENJORI-THREE SPRINGS RD & LOT 25 MIDLANDS RD, WOMARDEN – SHIRE OF THREE SPRINGS

In response to correspondence received on 20 April 2026 Main Roads has no objections, to the application subject to the following conditions being imposed:

Conditions

1. The developer must ensure the proposed construction and operational transport routes proposed for use are deemed suitable by the Shire of Three Springs and Main Roads.

Justification for Condition

The development is the nexus for the works/upgrades to be completed. Condition has been applied to reflect Main Roads and The Shire's roles as the road authorities.

2. The applicant is required to submit an Application form to undertake works within the road reserve prior to undertaking any works within the Brand Highway road reserve. Application forms and supporting information about the procedure can be found on the Main Roads website > Technical & Commercial > Working on Roads.

Justification

Public safety and protection of the Primary Regional Road Reservation.

3. A transport management plan in conjunction with an application for a permit that requires vehicle and machinery access and movement for Restricted Access Vehicles shall be submitted for approval to the satisfaction of Main Roads Western Australia.

Justification for Condition

Public safety and protection of the Primary Regional Road Reservation.



Advice

- a) Condition 1 and 2: The intersections and routes between the Local Government roads and the Midlands Rd must be upgraded to facilitate the transport of solar farm and battery storage components.
- b) Condition 3: Heavy vehicle access must be approved from Main Roads where the routes relating to the development application are not approved for the proposed heavy vehicle combinations including OSOM (Over Sized, Over Mass) vehicles. Main Roads is the relevant authority to issue such approvals. Such an approval may be subject to any necessary intersection upgrades being undertaken at the applicant's expense to the satisfaction of Main Roads. The applicant is advised to contact Main Roads' Heavy Vehicle Services branch to ascertain any approval requirements. Information can also be found on the Heavy Vehicles Access Requirements in WA section of the Main Roads website.

Should the Shire disagree with or resolve not to include as part of its conditional approval any of the above conditions or advice, Main Roads requests an opportunity to meet and discuss the application further, prior to a final determination being made. Main Roads requests a copy of the final determination on this proposal to be sent to mwgplanning@mainroads.wa.gov.au quoting the number reference above.

Yours sincerely

Louise Adamson
Network Manager
Mid West-Gascoyne

From: MWGPlanning <MWGPlanning@mainroads.wa.gov.au>

Sent: 04 May 2026 13:25

To: Patricia Mckeeon <es@threesprings.wa.gov.au>; Simon Lancaster <simon.lancaster@chapmanvalley.wa.gov.au>; Shire of Three Springs - TSPO <general@threesprings.wa.gov.au>

Cc: MWGPlanning <MWGPlanning@mainroads.wa.gov.au>; Louise Adamson <louise.adamson@mainroads.wa.gov.au>

Subject: RE: 002-594 - Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

Hi Simon and Patricia

Please see attached Main Roads response to the abovementioned DA, our conditions are based on the information contained in the Traffic Impact Statement (TIS) supplied with the application. However, there are some issues with the proposals, assumptions, and technical validity of the TIS. As a courtesy to the Shire, we would like to provide some commentary on these issues so you can use them to inform the decision and conditions. Please note our following comments –

- **Operational Traffic Assessment**

This section of TIS appears to be overly generic and primarily considers routine staff vehicle movements. For a development of this scale, the assessment should also consider periodic maintenance activities over the life of the project. These may include heavy vehicle movements associated with HV cable replacement, inverter maintenance or replacement, battery component replacement at regular intervals, and other non-routine maintenance activities. The TIS should be updated to provide a more realistic representation of operational-stage traffic.

- **Construction Traffic – Potential Underestimation**

The construction-stage traffic generation appears to underestimate the likely heavy vehicle (HV) task. Given the scale of the project, the number of HV movements associated with transport of solar infrastructure, battery units, transformers, cabling, and associated equipment from port to site is likely to be higher than presented. The applicant should review and justify the assumed construction-stage HV traffic volumes, including peak delivery periods.

- **Turn Treatment Warrant Assessment**

The TIS states that the turn warrant assessment results in SL and SR outcomes, however the actual warrant calculations have not been included. The applicant should provide the full turn treatment warrant assessment in TIS for review. Noting that the

proposed access is located on a Local Government Authority (LGA) road, final agreement on the treatment will be subject to the requirements of the Shire.

- **SISD assessment**

There is no SISD assessment in the TIS. Main Roads is concerned because the operating speed (85th Percentile) far exceeds the posted speed. Main Roads traffic data for Morawa–Three Springs Road in the vicinity of the site indicates an 85th percentile speed of approximately 122.5 km/h, and AGRD Part 4A requires SISD to be assessed using the operating (85th percentile) speed. By calculation, the required SISD is approximately 390 m for trucks and 351 m for cars, subject to confirmation of the adopted deceleration factor and grade. The applicant should therefore update the TIS to include the SISD assessment using the appropriate 85th percentile speed and demonstrate that the proposed access location satisfies the required sight distance for the relevant design vehicle.

- **Swept Path Assessment**

The TIS does not include swept path analysis. The applicant should provide swept path assessment for the proposed site access, the Franklin Road - Midlands Road intersection, the Telegraph Rd - Franklin Rd intersection and other key intersections along the haulage route. This assessment should demonstrate that the largest design vehicle, including RAV 6 and RAV 7 vehicles, can be safely accommodated.

- **Franklin Road - Midlands Road and Telegraph Rd - Franklin Rd Intersections**

The TIS does not adequately assess the suitability of the Franklin Road - Midlands Road and Telegraph Rd - Franklin Rd intersection for the proposed construction traffic. Given the existing intersection geometry, a turn treatment warrant assessment and SISD should be undertaken for this intersection, considering the additional light and heavy vehicle traffic generated during the construction phase. The TIS should demonstrate whether the existing intersection configuration is suitable or whether upgrades are required.

- **RAV Network Conditions - Franklin Road and Telegraph Road**

The TIS identifies the surrounding road network as RAV 6 and RAV 7, however, it does not acknowledge the operational constraints associated with Franklin Road and Telegraph Road. These routes are subject to specific RAV Network conditions, including low-volume route classification, speed restrictions, controlled two-way vehicle interaction, and limitations during wet conditions, particularly on unsealed sections. These constraints indicate that the route is operationally limited rather than a standard freight corridor. The TIS should be updated to acknowledge these conditions, assess their impact on construction logistics, confirm whether the route is suitable for the proposed heavy vehicle and OSOM transport task and address any necessary works required to

make the route acceptable (to the satisfaction of the Shire of Three Springs and Main Roads WA Heavy Vehicle Services).

- **School Bus route - Three springs Morawa Road**

Three Springs - Morawa Rd carries a conditional RAV approval which states “Operation is not permitted while the school bus is operating on the road. Operators must contact the relevant schools and obtain school bus timetables; or where direct contact can be made with the school bus driver, operation is permitted once the school bus driver confirms all school drop-offs/pick-ups have been completed on the road.” The TIS does not identify or assess the interaction between the proposed construction traffic and existing school bus routes in the area. It is understood that sections of Three Springs-Morawa Road form part of an active school bus route, which will also be used by RAV 6 and RAV 7 vehicles associated with the development during the construction phase. The TIS should acknowledge this interaction and assess the associated safety risks, particularly during school bus operating hours. Appropriate mitigation measures should also be outlined, such as scheduling of heavy vehicle movements outside school bus times, implementation of traffic management controls where required, and coordination with relevant stakeholders to minimise potential conflicts (to the satisfaction of the Shire of Three Springs and Main Roads WA Heavy Vehicle Services).

Please feel free to reach out to us at mwgplanning@mainroads.wa.gov.au if you have any questions or comments regarding the above.

Regards,

Anthony Williams

Asset Manager

Mid West - Gascoyne Region

Regional Operations

Tel: [+61 8 9956 1261](tel:+61899561261)



Main Roads acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures; and to Elders both past and present.



Department of Biodiversity,
Conservation and Attractions



Your ref: A886, A887
Our ref: PRS 55741
Enquiries: Jess Gillespie
Phone: 9964 0901
Email: jess.gillespie@dbca.wa.gov.au

Mr Mark Dacombe
Temporary Chief Executive Officer
Shire of Three Springs
PO Box 117
THREE SPRINGS WA 6519

Email: general@threesprings.wa.gov.au

Dear Mr Dacombe

PROPOSED RENEWABLE ENERGY FACILITY (SOLAR FARM AND BATTERY STORAGE SYSTEM) 3024 (LOT 201) PERENJORI-THREE SPRINGS ROAD & 17112 (LOT 25) MIDLANDS ROAD, WOMARDEN

Thank you for your letter of 17 April 2026 regarding the proposed solar farm and battery storage system.

The Department of Biodiversity, Conservation and Attractions has no objections to the proposal as outlined in your letter. It is anticipated that the proposed solar farm and battery storage system and any associated environmental impacts will be appropriately managed through the existing planning framework.

Thank you for raising this matter to our attention. If you have any queries regarding this matter, please contact Jess Gillespie on 9964 0901.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Allison Donovan'.

Allison Donovan
REGIONAL MANAGER
Midwest Region

01 May 2026

From: Valerie Shrubbs

Sent: Monday, 4 May 2026 1:00 PM

To: 'general@threesprings.wa.gov.au' <general@threesprings.wa.gov.au>

Cc: 'planner@chapmanvalley.wa.gov.au' <planner@chapmanvalley.wa.gov.au>;
'es@threesprings.wa.gov.au' <es@threesprings.wa.gov.au>

Subject: FW: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

Our ref: REQ-0003156

Dear Simon,

Renewable Energy Facility (Solar Farm & Battery Energy Storage System) upon 3024 (Lot 201) Perenjori-Three Springs Road, Womarden & 17112 (Lot 25) Midlands Road, Womarden

Thank you for providing the development application for the Department of Water and Environmental Regulation (Department) to consider.

The Department has identified that the proposed activity has the potential for impact on environment and water resource values. Key issues and recommendations are provided below, and these matters should be addressed.

Noise

The Department's Environmental Noise Branch (ENB) has reviewed the environmental noise assessment (ENA) submitted with the development application report and provides comments below.

Noise criteria

The proponent identified the nearest noise sensitive receivers as follows:

- Single dwelling on Lot 201, approximately 2 kms to the northwest of the solar farm. This receiver is labelled as "R2" in the ENA.
- Multiple dwellings along Morawa-Three Springs Road, approximately 2.8 kms to the west of the BESS. The closest of these receivers is labelled as "R1" in the ENA.

Although the single dwelling to the northwest (R2) is on the same Lot 201 as the solar farm, it could be considered a separate noise sensitive premises for the purposes of the *Environmental Protection (Noise) Regulations 1997* (Noise Regulations). I note the ENA identified the Noise Regulations as being the applicable criteria at both receivers R1 and R2.

On the basis the land surrounding the Proposal would be considered *noise sensitive* (i.e. rural land), an assigned level of 60 dB L_{A10} would also apply at the Proposal's development area boundaries.

Cumulative noise emissions, in accordance with regulations 7(1) and 7(2), may also require consideration, given the solar farm and BESS proposal located further west [3].

Noise modelling

The ENA lacks details of the noise modelling undertaken, making it difficult to comment on the veracity of the predicted results. ENB understands this is a preliminary assessment such that not all details of the noise sources may be known. Nonetheless, the ENA is to present, as a minimum, the following information:

- The prediction algorithm and ground factor (G) used. Although not explicitly referenced in the ENA, it appears the CONCAWE algorithm, as implemented in the software SoundPLAN were selected. However, given the separation distances are over 2 kms, in this instance the ISO 9613-2:2024 algorithm with a ground factor of 0.5 may be more appropriate.
- The number of sources of each type included in the model. While the ENA assumed 252 BESS, it is not clear how many “inverters” and “substation” were included in the model. It is also not clear whether the *power conversion systems* (PCS) referred to in the development application report [1] were included in the model (e.g. inverters?).
- Noise sources’ spectral data.
- The modelled height of the individual noise sources and their type e.g. point source, ‘box’ source.
- Noise contours for all modelled scenarios.
- Details of any barrier or directional effects (other than from topography).

The sources sound power levels presented in Table 4.1 of the ENA appear reasonable and are comparable to similar projects.

The levels predicted at R1 and R2 appear reasonable given the separation distances, and the inclusion of the tonal adjustment is supported. However, these levels and the levels at the development area boundaries will need to be confirmed as the Proposal progresses to detailed design, based on the above comments.

Conclusion

Based on the information provided, it is likely the noise emissions from the Proposal can comply with the requirements of the Noise Regulations at the receivers identified.

However, this is a preliminary assessment and noise levels will need to be confirmed as the Proposal progresses to detailed design.

Waterways Protection

Various minor waterways are located within the project area. Although these waterways may not be impacted by the proposed works, it is recommended that care is taken during construction to minimise the risk of impact.

The proponent should be encouraged to implement best management practices during future activities to minimise impacts on riparian vegetation and surface water quality.

Best management practice include (at minimum):

- Disturbance to riparian vegetation should be avoided to maintain foreshore stability and protect important riparian habitats.
- Constructing any unavoidable creek crossings on relatively straight sections of the watercourse, not on meander bends.
- Limit creek crossings, minimize impact on water ways banks and vegetation
- Undertake revegetation of disturbed areas.

A Bed and Banks permit under the *Rights in Water and Irrigation Act 1914*, may be required for the interference with the bed and bank of any watercourse.

For more information, it is recommended that the proponent contact the Mid-West Gascoyne Water Licensing team on 9965 7400 or midwestgascoyne@dwer.wa.gov.au.

Threatened Ecological Communities

Priority 3 (P3) Threatened Ecological Communities (TECs) Eucalypt woodlands of the Western Australian Wheatbelt are present within both lots.

If you have questions about the threatened fauna and TECs on your land, we recommend you contact the Department of Biodiversity, Conservation and Attraction's Species and Communities Program on 9219 8762 or by emailing tecsc@dbca.wa.gov.au

Water Licensing

The proposed activities occur within the proclaimed Gascoyne Groundwater area and subject to licensing requirements under the *Rights in Water and Irrigation (RIWI) Act 1914*.

There are two ground water licenses on Lot 201 Perenjori-Three Springs Road GWL65325(7) and GWL200126(1), should the applicant seek to use this water for construction or ongoing use an alteration to the groundwater licenses may be required.

It is recommended that the proponent contact the Mid-West Gascoyne Water Licensing team on 9965 7400 or midwestgascoyne@dwer.wa.gov.au regarding any groundwater licensing requirements.

The region is currently experiencing a backlog of applications. To avoid delays, the Department strongly recommends lodging an application well in advance of the planned commencement of works.

The Department should be notified of any modifications to the development application that may have implications on aspects of environment and/or water management, to enable the implications to be assessed.

Please contact me if you require any further information on these comments.
Yours sincerely,

Valerie Shrubbs
District Manager
Midwest Gascoyne Region
Approvals – Statewide Delivery

Department of Water and Environmental Regulation
211 Robinson Street Carnarvon WA 6701
PO Box 81, Carnarvon WA 6701
Ph: 08 9941 6101 | E: Valerie.shrubbs@dwer.wa.gov.au
www.dwer.wa.gov.au

From: Anthony Lebessis <Anthony.Lebessis@team.telstra.com>

Sent: Wednesday, 6 May 2026 12:30 PM

To: <es@threesprings.wa.gov.au>

Subject: Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

Good afternoon,

Please be advised that Telstra has **no objections** to the proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden.

Telstra can utilise statutory notices in the future if it wants to access the land for the purposes of any inspection, maintenance and installation of low impact facilities.

Regards

AnthonyLebessis



Asset Protection & Relocation

Location Intelligence Network Technical Specialist Road Closures/Opening, Tenures & Reticulations

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E Anthony.Lebessis@team.telstra.com

W www.telstra.com

This email may contain confidential information.

If I've sent it to you by accident, please reply to this email to notify the sender of its incorrect delivery and then delete both it and your reply.

PLEASE NOTE:

Please email your future requests to F0501488@team.telstra.com *** DO NOT POST. Also DO NOT SEND your requests to NetworkIntegrity@team.telstra.com as this team deals with asset relocations only***.

Also ensure that clear and legible plans or maps are provided in order to avoid delays in processing your request .





Your reference: OCR267274
Our reference: LUP 2404
Enquiries: Greg Doncon

Mark Dacombe
Temporary Chief Executive Officer
132 Railway Road, Three Springs WA 6519

Email: general@threesprings.wa.gov.au.

Date: 4 May 2026

Dear Mark

Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) 3024 (Lot 201) Perenjori-Three Springs Rd & 17112 (Lot 25) Midlands Rd, Womarden

Thank you for inviting the Department of Primary Industries and Regional Development (DPIRD) to comment on the above proposal. DPIRD does not object to the proposal and offers the following comments.

Recommendations:

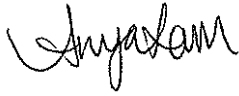
DPIRD encourages the proponent to:

- Follow the Community Benefit Guideline [Community Benefits Guideline: Realising the Opportunities of the Energy Transition](#) and work with the Shire of Three Springs to develop a local benefits package, while being flexible and open to suggestions for improved local benefits.
- Carefully analyse and plan how its accommodation needs will be met given concerns about the availability of local housing and worker accommodation.
- Contact DPIRD's Local Adviser Network (local.content@dpird.wa.gov.au) to find out how they might best engage local regional businesses to supply the project.
- Prepare an operational Biosecurity Management Plan
- Conduct a series of declared weed surveys across different seasons of the year
- Identify of a biosecurity clean down area on site
- Prepare management plans for both surface water and wind erosion
- Prepare a decommissioning plan

Further advice on these matters is included at Attachment 1.

Should you have further enquiries about this response, please contact Greg Doncon on 08 9081 3117 or Greg.Doncon@dpird.wa.gov.au

Yours sincerely

A handwritten signature in black ink, appearing to read 'Anya Lam', with a stylized, cursive script.

Anya Lam

**Director Agriculture Resource Management and Assessment
Fisheries and Sustainability**

Attachment 1: Detailed advice

Attachment 2: Mid-West Development Commission Feedback

Attachment 3: Project summary

Attachment 1: Detailed advice

Consultation

The proponent has undertaken ongoing consultation with the local community and the Shire since mid-2025. On 16 August 2025, the proponent held a meeting and site visit at the subject site with surrounding landowners and their families. A subsequent meeting was held with the Shire's Acting Chief Executive Officer on 3 September 2025.

To inform the preparation and design of the proposed development, the project team undertook various liaison with the Shire via telephone and email correspondence during January to February 2026. TBB Planning contacted the Shire of Three Springs to introduce the proposed solar farm and BESS development and to seek preliminary advice regarding technical reporting, public consultation requirements, approval pathways and any general feedback on the plans.

The Shire provided guidance on the assessment pathways and shared links to recent DAP agenda and minutes for approved solar farm applications within the shire. Community consultation was also discussed, with the Shire's acknowledgment of consultation fatigue in the locality due to multiple recent renewable energy proposals in recent years.

Community Benefit Fund: There is no commitment to establishing a Community Benefit Fund or serious consideration of factors outlined in Powering WA's Guideline on Community Benefits for Renewable Energy Projects published in February 2026 but also released in draft form in June 2025 as part of a consultation process.

Given the Guideline is now published it could be considered to carry more weight, and proponents should take the recommendations more seriously.

Aboriginal heritage and consultation

A desktop Aboriginal heritage assessment was undertaken for the proposed facility through the Aboriginal Cultural Heritage Inquiry System (ACHIS), in accordance with the *Aboriginal Heritage Act 1972*. The assessment concluded that the proposed development does not pose any risk to Aboriginal heritage sites.

Renewable Energy Development

DPIRD notes the solar farm proposal presents a positive renewable energy development for the State with renewable energy to feed into the SWIS. However, in support of the Mid West Development Commission comments (Attachment 2), DPIRD is concerned about the lack of proposed tangible community benefits for the Three Springs community or Aboriginal people representing the area.

Opportunities for, and commitment towards, supporting local contractors has also not been considered and should also be addressed.

Biosecurity

DPIRD recommends approval be conditional on the preparation of an operational Biosecurity Management Plan (BMP) outlining arrangements for machinery inspection, equipment cleaning, ongoing monitoring of weeds across the site, contingencies, reporting, and the identification of responsibilities for various parties.

DPIRD recommends that a series of declared weed surveys be conducted across different seasons of the year. This will assist in identifying any species already present on the property. Monitoring undertaken after completion of the construction phase will determine whether any species have been introduced to the site and require management. DPIRD has assisted other solar farms to manage declared species that were either missed during vegetation surveys or introduced during construction.

DPIRD recommends that a biosecurity clean down area is identified on site. The Development Application states that “four construction laydown areas will be established” (p14). These areas could also be designated as biosecurity clean down areas. Any machinery or equipment arriving at or leaving the construction site should be brought to a laydown / clean down area for inspection to ensure it enters or leaves the solar farm / BESS site in a clean condition.

Erosion risk

DPIRD recommends that the proponent prepare management plans for both surface water and wind erosion, incorporating appropriate design methods to manage erosion risks associated with intense summer or winter weather events.

The solar farm will be located on the Nebru 7 and Winchester 3 soil-landscape subsystem units. The Nebru 7 subsystem consists of yellow and pale deep sands, which carry a high to very high wind erosion risk. While the risk of soil erosion is high if the soil is bare, DPIRD expects this risk will be managed during the construction / decommissioning phases. The establishment of ground cover should manage this risk for the duration of the facility’s operational life. DPIRD suggests that, to prevent wind erosion, pastures should be managed to maintain a minimum of 50% ground cover, with a target of 70%.

Decommissioning Plan

DPIRD recommends approval is conditional on the preparation of a decommissioning plan. This will ensure the facility is planned and constructed in a manner that enables the site to be returned to agricultural production without residual contamination.

DPIRD expects the lifespan of the proposed facility to be up to 30 years and anticipates that the facility may be renewed at that time to extend its operational life. Eventually the facility will be decommissioned, the infrastructure removed and the land returned to farming purposes.

Attachment 2: Mid-West Development Commission Feedback

The Mid-West Development Commission (MWDC) provided the following advice.

Generally supportive of project intent, noting:

- The proponent is proactively investigating three options and locations for workforce accommodation.
- Accommodation in Three Springs is currently very tight with the CEL-North work ongoing and numerous other projects in planning / development. This should be given serious consideration.
 - Conscious of this requirement being put on the Tathra Wind Farm in Shire of Carnamah recently:
“one of the conditions is No.23 passed as amended is “*Prior to construction commencing on-site, an **Accommodation Strategy** shall be developed in consultation with the Local Government. The Accommodation Strategy shall be implemented to the satisfaction of the Local Government.*”
With the advice note mentioning “12. With regard to the Accommodation Strategy the following should be included:
 - i. *Accommodation of workers during construction phase including an assessment of options; and*
 - ii. *Accommodation of operational staff including measures to promote local residency choice for operational staff*”
- While not a planning matter, there is no explicit mention of the new Community Benefits Guidelines and how the proponent would seek to implement.

Attachment 3: Project summary

This development application is being submitted to the Regional Joint Development Assessment Panel (JDAP) through the Shire of Three Springs by Progressive Green Solutions, to build a solar farm and Battery Energy Storage System (BESS), located 3.2km north-east of Three Springs townsite and 310 km north of Perth.

The project will be hosted on 300 hectares of freehold agricultural land used predominantly for grain growing and sheep grazing. It will also be located within 3 kilometres Western Power's Three Springs Terminal at Womarden, 2 kilometres north of the townsite, allowing ready access to the South West Interconnected System (SWIS).

The project includes the construction and operation of:

- 153MW (AC) / 191 MW (DC) solar facility with 250MW BESS capacity and total 2 GWh storage capacity
- associated infrastructure, including a substation with point of connection to the 330 kV Western Power terminal to the west.

The estimated total construction cost for the project plus connection to the SWIS is \$1 billion.

The expected peak construction workforce is 180 people for the solar array and 150 for the BESS. Five permanent staff are also to be located in the area to support the solar array and BESS. The proponent is proactively investigating three options and locations for workforce accommodation, which will be either within the Three Springs townsite or two other nearby locations.

The key document from a regional development perspective is the Development Application report prepared by TBB Planning in March 2026.

This report summarises the project scope and the opportunities and challenges being faced by the proponent and the community.



Our Ref: 2026/1009
Your Ref: A886 and A887

Simon Lancaster
Shire of Three Springs
general@threesprings.wa.gov.au

Dear Mr Lancaster

**LOT 201 (3024) PERENJORI-THREE SPRINGS ROAD AND LOT 25 (17112)
MIDLANDS ROAD, WOMARDEN – PROPOSED RENEWABLE ENERGY FACILITY
(SOLAR FARM AND BATTERY ENERGY STORAGE SYSTEM) – DEVELOPMENT
APPLICATION**

I refer to your email dated 16 April 2026 regarding the submission of a revised Bushfire Management Plan (BMP) (Version Final), prepared by Western Environmental and dated 16 April 2026, for the above proposed development.

This advice relates to the *State Planning Policy 3.7 Bushfire* (SPP 3.7) and supporting *Planning for Bushfire Guidelines* (Guidelines), as well as DFES' role and responsibilities as Hazard Management Agency for Fire in Western Australia.

General Comment

- The proposal comprises a solar farm and battery energy storage system (BESS) facility with solar modules, 35 Power Conversion Systems (PCS) units, battery containers, substations (including 70 PCS units), six meteorological stations and incidental access roads, laydown areas, water tanks and security fencing.
- DFES notes that the current version of SPP 3.7 and the Guidelines no longer makes reference to 'high risk land use.' The decision maker has referred this proposal to DFES as a discretionary referral. DFES considers that SPP 3.7 and the Guidelines do not adequately address high risk land use such as renewable energy facilities from a HMA perspective. Given the temperature sensitive nature of the infrastructure, it is critical to ensure that the proposed design adequately responds to facility fire risks and bushfire risks in order to protect life, property and infrastructure.
- Accordingly, DFES has also assessed the proposal against the *CFA Design Guidelines and Model Requirements – Renewable Energy Facilities* as amended (REF Guidelines) which is currently considered best practice for the development of renewable energy facilities.
- DFES notes that the BMP is limited in detail as to the specifics of the BESS system, and the specific components provided as part of the overall development. This has limited DFES' ability to provide detailed feedback at this stage of development.

- Further, the BMP has not assessed large portions of the development (including the BESS) against the REF Guidelines. As such, there are large portions of the proposal that have not been addressed in the submitted documentation, leaving DFES unable to provide a complete assessment/response at this stage.
- Specific requirements of SPP 3.7 and the supporting Guidelines and the REF Guidelines are to be further addressed in the BMP as outlined in the below assessment. The assessment comments relating to the REF Guidelines have been incorporated into the below overall assessment comments for the respective issue/element.
- DFES has reviewed the BMP, however cannot guarantee that the BMP is consistent with all other plans and information submitted as part of the proposal. The decision maker should be satisfied that all submitted documents have consistent details.
- DFES will provide any additional operational advice once received, noting that some operational areas were unable to response within the requested timeframe.

Recommendation: Insufficient information provided – further information and review required

DFES advises that the proposed development has the potential to increase the bushfire risk to people, property and infrastructure, and the BMP should provide sufficient information to address the bushfire protection criteria and ensure the bushfire risk is at an acceptable level and appropriate to the land use and location.

DFES recommends the BMP be modified as per the Assessment advice provided in Tables 1-3 to contain all the information to address the requirements of SPP 3.7 and the Guidelines to enable a full assessment of the bushfire risk to inform decision making. The required information is listed in the table(s) below. Should the modified BMP affect the design of the proposal, the proposal should be amended to reflect these modifications.

If you require any clarification or further information regarding the below assessment, please do not hesitate to contact Senior Land Use Planning Officer – Michael Ball on telephone number 9395 9819.

Yours sincerely



**DESMOND ABEL
DIRECTOR LAND USE PLANNING**

28 May 2026

Table 1: Assessment – Policy Measure 7.1 ii. c. Compliant Preparation of a Bushfire Attack Level (BAL) Contour Map

Vegetation Classification or Exclusions	BMP Modification Required
<u>Overall vegetation assessment</u> DFES considers that more appropriately scaled vegetation classification/BAL contour maps should be provided, where retained vegetation/BAL contours will impact the development. DFES notes that the total of 18 photographs for such a large site/proposal does not provide sufficient evidence to validate all areas, or the specific boundaries between each plot. Multiple areas of plots 2, 3, 4 and 5 are classified with no evidence to validate them. For example, areas of Plot 5 – Class C Shrubland (Photo ID 10) detail vegetation taller than 2 metres with no evidence to detail which portion of the plot this taller vegetation covers. Given the lack of supporting evidence for large areas of the site, it is unclear if this issue is also present in other plots. DFES notes that slopes are present across the site, and it is unclear if all areas have been accurately classified given the large scale of some plots, and the changing topographic contours in these areas. The post-development vegetation assessment has excluded large portions of the site with no detail/mechanism to ensure that any management/removal of vegetation will occur. It is unclear how this exclusion will be achieved/enforced. Overall, there is insufficient evidence to validate the proposed vegetation inputs/BAL outputs. If unsubstantiated, the resultant BAL ratings may be inaccurate.	BAL Rating cannot be validated. Further evidence to support the vegetation classification of Plots 2-5 as well as the exclusion of Plot 9 is required.
SPP 3.7 Appendix A - Bushfire Assessment Methodologies	BMP Modification Required
<u>Method 2</u> The BMP does not include the calculations required to validate any of the Method 2 outputs discussed within the BMP. Appendix C (Method 2 BAL Calculations) includes a blank page only. Accordingly, DFES considers that the Method 2 outputs cannot be validated. DFES notes that as discussed below, Method 2 calculations will only provide value if evidence is provided to confirm that the proposed infrastructure can resist the suggested radiant heat values proposed by the BMP. No evidence has been provided to validate this assumption.	BAL Rating cannot be validated. Method 2 outputs cannot be validated.

Table 2: Policy Measure 7.1 ii. e. Compliance with the Bushfire Protection Criteria 7: Development – Commercial and Industrial

Element	Assessment	Action
Siting and Design – Asset Protection Zone (APZ)	A2.2 – not demonstrated The Bushfire Attack Level (BAL) ratings cannot be validated for the reason(s) outlined in Table 1. The BMP states that no habitable buildings are proposed within the site. DFES notes that this is inconsistent with most other solar/BESS sites that have been reviewed. As no development plans have been included in the referral (other than the basic site layouts included in the BMP), DFES is unable to validate this assumption. Confirmation should be provided that the overall site does not include any habitable buildings, or alternatively, the BMP should be updated to address Element 2. As noted above, DFES is unable to validate the BAL contours due to issues raised in the Table 1. It is considered imperative that any development approval includes clear enforceable mechanisms to require vegetation to be managed to low threat to achieve any BAL ratings relied upon to achieve compliance with regulatory framework.	BAL Rating cannot be validated. Modification to the BMP is required to address the Assessment advice in Table 1.
Siting and Design - Storage of Hazardous, Flammable and/or Combustible Materials	A2.4 – not demonstrated The BMP does not include any formal requirement for all hazardous, flammable and/or combustible materials to be stored in areas of BAL-29 or below. As such it is unclear how compliance with the requirement can be ensured by the BMP. Given the scale and nature of the use, DFES considers that assumptions are not appropriate, and that the BMP should include clear enforceable requirements for compliance to be achieved in perpetuity.	BAL Rating cannot be validated. Modification to the BMP is required to address the Assessment advice in Table 1.
Vehicular Access – Private Driveway	A3.1 – Comment only The BMP states that as no habitable buildings are proposed, the development is exempt from compliance with Element 3. DFES notes that the REF Guidelines provide requirements for internal access/the number of access points, and DFES considers that the level of detail provided in the current BMP is not sufficient to complete a full assessment.	Compliance cannot be validated.

Water Supply	A4.1 – not demonstrated It is noted that the BMP has not provided an assessment on the firefighting water supply requirements as the BMP states that there are no habitable buildings. Should the decision determine that habitable buildings are proposed as part of the application, the BMP is to demonstrate compliance with the requirements of Acceptable Solution A4.1 of the Guidelines. Furthermore, the BMP has not provided any detail on the water supply arrangements for the battery system. The additional elements (power conversion units and BESS substations) are co-located amongst the solar arrays, which may trigger additional requirements under the REF Guidelines. As the BESS has not been provided with any water supply, the BESS does not satisfy the requirements of the REF Guidelines. Five 45,000 litre tanks are proposed, which address requirements for the solar array only. DFES notes that the BMP should provide an overall size for the solar array to verify the proposed water requirements and ensure compliance.	Compliance with Water Supply for firefighting not demonstrated. Modification to the BMP is required to address the Assessment advice.
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Table 3: Policy Measure 7.1 iv. and Section 9.4.2 of the Guidelines: DFES Role as Hazard Management Agency (HMA)

DFES wishes to provide the below additional advice in its role and responsibilities of HMA for Fire in Western Australia.

Emergency Management Plan (EMP)		Action
Emergency Management Plan (EMP)	Given the high-risk land use at this location, it is considered appropriate that an 'Emergency Management Plan' be prepared. Consideration should be given to the Bushfire Emergency Plan (BEP) Manual (as published by the Western Australian Planning Commission) and Section 7 of the REF Guidelines. These contain details of information that should be included in a EMP and will ensure the appropriate content is detailed when finalising the EMP to the satisfaction of the decision maker.	Comment only.
Renewable Energy Facilities		Action
REF Guidelines	The BMP does not appear to consider all elements of the REF Guidelines. These areas include (but are not limited to): Several requirements of sections 1-3 and parts of section 4 are not addressed (e.g. detailed designs are required at development application stage to confirm vehicular	Compliance with the REF Guidelines not demonstrated.

	access/passing bay details, each area of the site requires multiple accesses however this is not detailed (it appears that each area has a single access only, and BMP commentary does not provide any clarity), water tank locations are required, and several comments in section 4.2 lack certainty. • The BMP should be updated to clearly detail an APZ over all areas that will be managed to low threat to ensure that these areas have an enforceable mechanism. • Section 4.2.5 - firebreaks are required for all buildings however this does not appear to be shown on submitted plans. Detailed plans are required at this stage to confirm compliance with all firebreak locations. • Section 4.2.6.2 – 6 metre separation/firebreaks required to all buildings on site. • BESS Model Requirements have not been assessed. • Section 5.1 – no detail of any fire detection provided. • Submitted text/plans lack clarity over first aid, firefighting equipment, smoking areas, remote monitoring etc. • Section 6 – proposal has not been developed in consultation with DFES, leading to several issues discussed in this response. • All sections beyond section 6.2 (including sections 7 and 8) do not appear to be addressed at this stage. DFES requests an updated assessment ensuring that all areas of the REF Guidelines (and all elements of the proposal including the BESS and associated infrastructure) have been addressed. The mapping does not provide sufficient detail, and it is unclear if the large volume of outstanding information can be adequately conditioned at this stage.	Modification to the BMP is required to address the Assessment advice.
Risk Management Plan	As per the REF Guidelines, a Risk Management Plan (RMP) describes the risk management process and its outcomes, including the specific site hazards/risks and their analysis, control measures, and the monitoring and review process. A RMP is considered to be a critical requirement of planning and informing fire risk management in the design and operation of renewable energy facilities. DFES notes that the BMP provides the commitment to comply with the REF Guidelines. While DFES accepts that <i>Appendix E: CFA Guidelines Assessment</i> of the BMP can be considered as a draft RMP, a detailed RMP should be further developed to demonstrate compliance with the REF Guidelines, including addressing the following model requirements of the REF Guidelines:	A detailed Risk Management Plan is required to be provided.

	- Detailed site plans showing the location of site vehicle access points, internal roads, solar arrays, battery containers, substations, buildings and fire water supplies. - The exact specifications of the elements within the renewable energy facility, such as solar panel model and manufacturer, the battery chemistry, relevant specifications and technical data sheets on the battery energy storage system (BESS) facility. - Details of the fire, smoke, heat, and toxic off-gassing detection system for the BESS facility. The system should specify what triggers an internal operator response and what triggers a 000 call. - Details of the explosion prevention and venting system for the BESS facility. - Details of the battery management and monitoring system. The system should enable the operator to intervene for the prevention of thermal runaway. - Details of the system to prevent water ingress to battery containers and appropriate ingress protection rating for containers. - Details of the warning and alarm system within battery containers and/or the facility. The system should specify what each alarm signal means.	
Consultation	In the event that an approval is granted, the DFES District Officer responsible for this region and the local fire and emergency services should be consulted during the development, construction, and leading up to the commissioning of the facility. It is considered critical for the local fire and emergency services to understand the hazards present in the facility and the measures required to ensure the safety of firefighting personnel when working in or around different parts of the facility. This may impact on how crews respond to a fire within the facility, which may in turn have ramification regarding the optimal number and location of water supplies.	Comment only.
DFES Other Technical Advice		Action
DFES Regional Operations	It is considered that insufficient detail has been provided in the submitted plans for the vehicular access arrangements around the facility. Without detailed plans, general discussion of vehicular access arrangements in the BMP alone is not adequate. Similarly, there is insufficient detail regarding the siting and design of the proposed water supply options, and it is noted that the documentation does not provide any consideration of the water requirements for the proposed BESS and associated buildings. Fire suppression is	Modification to the BMP is required to address the Assessment advice.

	the last line of defence for BESS installations. Ideally, the BESS should incorporate its own cooling option in the event of fire propagation. This may include a water-mist system with deluge misting nozzles located internally within the BESS enclosure. The system can be connected directly to a water supply such as a dedicated water tank, or alternatively a fire brigade pumping-in breech dry pipe water-mist system can be installed externally to cool the interior of the enclosure. It is considered critical that detailed design work be completed in the first instance to demonstrate to the fullest extent possible how compliance with the bushfire protection criteria will be achieved, so as to reduce the vulnerability of people, property and infrastructure to the threat of bushfire. Additional detailed comments from DFES Regional Operations will be provided once received.	
DFES Special Operations	Detailed comments from DFES Special Operations will be provided once received.	Comment only.
DFES Land Use Planning	It is the responsibility of the proponent to ensure the proposal complies with relevant planning and building requirements. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, environmental health or any other approvals required by a relevant authority under written laws.	Comment only.



Friday, 5 June 2026

Our Ref: A25.378-LTR-BMPRES_0_FINAL

Shire of Three Springs
132 Railway Road,
Three Springs WA 6519

(08) 6162 8980
PO Box 437, Leederville, WA 6903
enquiries@westenv.com.au

ATTENTION: Simon Lancaster

**SUBJECT: RESPONSE TO DFES COMMENTS ON BUSHFIRE MANAGEMENT PLAN:
LOT 201 (3024) PERENJORI-THREE SPRINGS ROAD AND LOT 25 (17112) MIDLANDS
ROAD, WOMARDEN – PROPOSED RENEWABLE ENERGY FACILITY (SOLAR FARM
AND BATTERY ENERGY STORAGE SYSTEM) – DEVELOPMENT APPLICATION**

Western Environmental Approvals Pty Ltd (WEPL) has prepared this response to the comments provided by the Department of Fire and Emergency Services (DFES) regarding the Bushfire Management Plan (BMP) for the proposed solar farm and battery energy storage system (BESS) facility at Lot 201 Perenjori-Three Springs Road and Lot 25 Midlands Road, Womarden (the subject site). WEPL has provided the following responses to the comments provided by DFES in Table 1.

General Comments

- It should be reiterated that the *Country Fire Authority (CFA) Design Guidelines and Model Requirements for Renewable Energy Facilities Version 4* (REF Guidelines) are a best practice guide and have no statutory effective in Western Australia. The BMP seeks to strike a balance by adopting certain requirements from the REF Guidelines to manage bushfire risk to an acceptable level. Based on the information currently available, it is not possible to undertake a complete assessment against the REF Guidelines. The BMP acknowledges that there are certain details are not currently available at the development application stage and includes a requirement for the BMP to be updated prior to building permit to ensure the detailed design complies with the management measures outlined in Table 6.
- DFES fail to acknowledge that the majority of the proposed development, including the BESS, is not proposed within a designated bushfire prone. Assessment of the proposed development has been guided by the Map of Bush Fire Prone Areas, with only bushfire prone assets and infrastructure being assessed under the BMP. WEPL have prepared several BMPs for renewable energy projects which have applied the same approach, all of which have been approved by the Regional Development Assessment Panel (DAP). More recently, this includes the Binningup Solar Farm and the Kojonup Wind Farm. A copy of the Regional DAP meeting minutes can be accessed from the below link: https://www.planning.wa.gov.au/docs/default-source/daps/minutes---no-64---city-of-kalgoorlie-boulder---shire-of-kojonup---shire-of-harvey.pdf?sfvrsn=5c5c10c5_1

Table 1: DFES comments and responses provided by WEPL.

DFES comment	WEPL response
Overall vegetation assessment DFES considers that more appropriately scaled vegetation classification/BAL contour maps should be provided, where retained vegetation/BAL contours will impact the development. DFES notes that the total of 18 photographs for such a large site/proposal does not provide sufficient evidence to validate all areas, or the specific boundaries between each plot. Multiple areas of plots 2, 3, 4 and 5 are classified with no evidence to validate them. For example, areas of Plot 5 – Class C Shrubland (Photo ID 10) detail vegetation taller than 2 metres with no evidence to detail which portion of the plot this taller vegetation covers. Given the lack of supporting evidence for large areas of the site, it is unclear if this issue is also present in other plots. DFES notes that slopes are present across the site, and it is unclear if all areas have been accurately classified given the large scale of some plots, and the changing topographic contours in these areas. The post-development vegetation assessment has excluded large portions of the site with no detail/mechanism to ensure that any management/removal of vegetation will occur. It is unclear how this exclusion will be achieved/enforced. Overall, there is insufficient evidence to validate the proposed vegetation inputs/BAL outputs. If unsubstantiated, the resultant BAL ratings may be inaccurate.	WEPL considers the vegetation classification and BAL contour maps to be at a scale that is suitable for the proposed development given the large expanses of solar modules. Other components such as the power conversion system (PCS) units, BESS, substation and water tanks are clearly identifiable on the assessment maps. The number of photos provided in the BMP is also considered sufficient given the majority of vegetation comprises of grassland within paddocks and shrubland along the edges of the salt lakes. WEPL have in excess of 100 photos of these areas on file however it is not considered necessary to include all site photos within the BMP. In addition, sufficient evidence has also been provided of the smaller areas where the vegetation classifications differ (i.e. forest and scrub vegetation). WEPL disagrees with the comment relating to Photo ID 10 which clearly depicts Class C Shrubland (Plot 5). While there are some taller, isolated shrubs in the background, the predominant vegetation classification is Class C Shrubland. WEPL confirms the site assessment has been undertaken by an experienced Level 3 accredited bushfire practitioner and that the vegetation has been classified in accordance with AS 3959: 2018. The effective slope across the assessment area has also been assessed on site in accordance with AS 3959:2018 using a rangefinder. The post development vegetation assessment has excluded the subject site given the grassland will need to be managed to a low threat state by the proponent to maintain access for maintenance and prevent damage. The proponent's maintenance regime will be outlined in the Risk Management Plan which is required to be prepared prior to the commencement of operations, as a requirement of the BMP. WEPL confirms the assessment inputs and BAL outputs in the BMP are accurate and correct. No BMP modifications are required.
Method 2 The BMP does not include the calculations required to validate any of the Method 2 outputs discussed within	WEPL acknowledges that the Method 2 calculations were accidentally excluded from the BMP. A copy of the Method 2 outputs has been included in the updated BMP.



DFES comment	WEPL response
the BMP. Appendix C (Method 2 BAL Calculations) includes a blank page only. Accordingly, DFES considers that the Method 2 outputs cannot be validated. DFES notes that as discussed below, Method 2 calculations will only provide value if evidence is provided to confirm that the proposed infrastructure can resist the suggested radiant heat values proposed by the BMP. No evidence has been provided to validate this assumption.	The Method 2 BAL assessment has been undertaken to ensure the high-risk assets (PCS units) are setback from bushfire hazards to ensure the radiant heat impact does not exceed 10kW/m². This has previously been supported by the Regional DAP as an acceptable threshold for high-risk assets in bushfire prone areas. The setback areas will be maintained as an Asset Protection Zone (APZ) to ensure a radiant heat impact of 10kW/m² is maintained in perpetuity. The BMP has been updated to include the Method 2 outputs.
Siting and Design – Asset Protection Zone (APZ) The Bushfire Attack Level (BAL) ratings cannot be validated for the reason(s) outlined in Table 1. The BMP states that no habitable buildings are proposed within the site. DFES notes that this is inconsistent with most other solar/BESS sites that have been reviewed. As no development plans have been included in the referral (other than the basic site layouts included in the BMP), DFES is unable to validate this assumption. Confirmation should be provided that the overall site does not include any habitable buildings, or alternatively, the BMP should be updated to address Element 2. As noted above, DFES is unable to validate the BAL contours due to issues raised in the Table 1. It is considered imperative that any development approval includes clear enforceable mechanisms to require vegetation to be managed to low threat to achieve any BAL ratings relied upon to achieve compliance with regulatory framework.	As outlined above, the site assessment has been undertaken by an experienced Level 3 accredited bushfire practitioner, with the classified vegetation and effective slope assessed in accordance with AS 3959: 2018. The BAL outputs in the BMP can therefore be validated given they are accurate and represent the post development scenario. Based on the information currently available, WEPL is not aware of any habitable buildings that are proposed as part of the development application. As such, there is no trigger to address Element 2 of the Guidelines. If habitable buildings are proposed within a designated bushfire prone area, they will be subject to a separate assessment against SPP 3.7 and the Guidelines. As outlined above, the subject site will need to be maintained in a low threat condition for maintenance purposes. The proponent's maintenance regime will be outlined in the Risk Management Plan which is required to be prepared prior to the commencement of operations, as a requirement of the BMP. No BMP modifications are required.
Siting and Design – Storage of Hazardous, Flammable and/or Combustible Materials The BMP does not include any formal requirement for all hazardous, flammable and/or combustible materials to be stored in areas of BAL-29 or below. As such it is unclear how compliance with the requirement can be ensured by the BMP.	Based on the information currently available, WEPL is not aware of any hazardous, flammable and/or combustible materials being stored on site within a designated bushfire prone area. As such, there is no requirement to assess the proposal against A2.4 of the Guidelines. However, the BMP acknowledges that the PCS units are considered high risk and therefore requires them to be setback from bushfire hazards to achieve a radiant heat



DFES comment	WEPL response
Given the scale and nature of the use, DFES considers that assumptions are not appropriate, and that the BMP should include clear enforceable requirements for compliance to be achieved in perpetuity.	impact not exceeding 10kW/m², exceeding the requirements under A2.4 of the Guidelines. Furthermore, the BMP also states that if there are any hazardous, flammable and/or combustible materials to be stored on site, these shall be stored in areas that are subject to BAL-29 or below. No BMP modifications are required.
Vehicular Access – Private Driveway The BMP states that as no habitable buildings are proposed, the development is exempt from compliance with Element 3. DFES notes that the REF Guidelines provide requirements for internal access/the number of access points, and DFES considers that the level of detail provided in the current BMP is not sufficient to complete a full assessment.	Based on the information currently available, WEPL is not aware of any habitable buildings that are proposed as part of the development application. As such, there is no trigger to address Element 3 of the Guidelines. However, the BMP does include vehicular access requirements that will need to be considered as part of the detailed design stage. As outlined above, certain details are not currently available at this stage of the project, including the specific layout and design of the internal access roads. Table 6 of the BMP stipulates certain access requirements that must be met as part of the detailed design stage, in alignment with the requirements under the REF Guidelines. No BMP modifications are required.
Water Supply It is noted that the BMP has not provided an assessment on the firefighting water supply requirements as the BMP states that there are no habitable buildings. Should the decision determine that habitable buildings are proposed as part of the application, the BMP is to demonstrate compliance with the requirements of Acceptable Solution A4.1 of the Guidelines. Furthermore, the BMP has not provided any detail on the water supply arrangements for the battery system. The additional elements (power conversion units and BESS substations) are co-located amongst the solar arrays, which may trigger additional requirements under the REF Guidelines. As the BESS has not been provided with any water supply, the BESS does not satisfy the requirements of the REF Guidelines. Five 45,000 litre tanks are proposed, which address requirements for the solar array only. DFES notes that the BMP should provide an overall size for the solar	Based on the information currently available, WEPL is not aware of any habitable buildings that are proposed as part of the development application. As such, there is no trigger to address Element 4 of the Guidelines. However, the BMP does include water supply requirements that will need to be considered as part of the detailed design stage, including the final location and capacity of static fire water tanks. Table 6 of the BMP stipulates certain water requirements that must be met as part of the detailed design stage. This includes the installation of five (5) 45,000 litres static fire water tanks, in alignment with the requirements under the REF Guidelines. As outlined above, the BESS and substations are not proposed within a designated bushfire prone area and therefore do not require a water supply under the BMP. This is consistent with previous development applications that have been approved by the Regional DAP (refer link above). No BMP modifications are required.



DFES comment	WEPL response
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array to verify the proposed water requirements and ensure compliance.

Emergency Management Plan (EMP)

Given the high-risk land use at this location, it is considered appropriate that an 'Emergency Management Plan' be prepared. Consideration should be given to the Bushfire Emergency Plan (BEP) Manual (as published by the Western Australian Planning Commission) and Section 7 of the REF Guidelines. These contain details of information that should be included in a EMP and will ensure the appropriate content is detailed when finalising the EMP to the satisfaction of the decision maker.

WEPL acknowledges the DFES comment and confirms that a EMP will be prepared prior to the commencement of operations.

Table 6 of the BMP requires an EMP to be prepared.

REF Guidelines

The BMP does not appear to consider all elements of the REF Guidelines. These areas include (but are not limited to):

- Several requirements of sections 1-3 and parts of section 4 are not addressed (e.g. detailed designs are required at development application stage to confirm vehicular access/passing bay details, each area of the site requires multiple accesses however this is not detailed (it appears that each area has a single access only, and BMP commentary does not provide any clarity)), water tank locations are required, and several comments in section 4.2 lack certainty.
- The BMP should be updated to clearly detail an APZ over all areas that will be managed to low threat to ensure that these areas have an enforceable mechanism.
- Section 4.2.5 - firebreaks are required for all buildings however this does not appear to be shown on submitted plans. Detailed plans are required at this stage to confirm compliance with all firebreak locations.
- Section 4.2.6.2 – 6 metre separation/firebreaks required to all buildings on site.
- BESS Model Requirements have not been assessed.

As outlined above, the BMP acknowledges that certain details are not currently available to enable a complete assessment of the development against the REF Guidelines. Table 6 of the BMP includes bushfire management measures that will need to be considered as part of the detailed design stage, taking guidance from the REF Guidelines.

In addition, Table 6 includes a requirement for the BMP to be updated to ensure the bushfire management measures are adopted in the detailed design. Appendix E (CFA Guidelines Assessment) of the BMP will also be updated as further details become available.

No BMP modifications are required at this stage of the project.



DFES comment	WEPL response
• Section 5.1 – no detail of any fire detection provided. • Submitted text/plans lack clarity over first aid, firefighting equipment, smoking areas, remote monitoring etc. • Section 6 – proposal has not been developed in consultation with DFES, leading to several issues discussed in this response. • All sections beyond section 6.2 (including sections 7 and 8) do not appear to be addressed at this stage. DFES requests an updated assessment ensuring that all areas of the REF Guidelines (and all elements of the proposal including the BESS and associated infrastructure) have been addressed. The mapping does not provide sufficient detail, and it is unclear if the large volume of outstanding information can be adequately conditioned at this stage.	
Risk Management Plan As per the REF Guidelines, a Risk Management Plan (RMP) describes the risk management process and its outcomes, including the specific site hazards/risks and their analysis, control measures, and the monitoring and review process. A RMP is considered to be a critical requirement of planning and informing fire risk management in the design and operation of renewable energy facilities. DFES notes that the BMP provides the commitment to comply with the REF Guidelines. While DFES accepts that Appendix E: CFA Guidelines Assessment of the BMP can be considered as a draft RMP, a detailed RMP should be further developed to demonstrate compliance with the REF Guidelines, including addressing the following model requirements of the REF Guidelines: • Detailed site plans showing the location of site vehicle access points, internal roads, solar arrays, battery containers, substations, buildings and fire water supplies. • The exact specifications of the elements within the renewable energy facility, such as solar panel model and manufacturer, the battery chemistry, relevant	WEPL acknowledges the DFES comment and confirms that a RMP will be prepared prior to the submission of the building permit. The RMP will take guidance from the REF Guidelines, as per the DFES comment. Table 6 of the BMP requires a RMP to be prepared.



DFES comment	WEPL response
specifications and technical data sheets on the battery energy storage system (BESS) facility. • Details of the fire, smoke, heat, and toxic off-gassing detection system for the BESS facility. The system should specify what triggers an internal operator response and what triggers a 000 call. • Details of the explosion prevention and venting system for the BESS facility. • Details of the battery management and monitoring system. The system should enable the operator to intervene for the prevention of thermal runaway. • Details of the system to prevent water ingress to battery containers and appropriate ingress protection rating for containers. • Details of the warning and alarm system within battery containers and/or the facility. The system should specify what each alarm signal means.	

Consultation

In the event that an approval is granted, the DFES District Officer responsible for this region and the local fire and emergency services should be consulted during the development, construction, and leading up to the commissioning of the facility.

It is considered critical for the local fire and emergency services to understand the hazards present in the facility and the measures required to ensure the safety of firefighting personnel when working in or around different parts of the facility.

This may impact on how crews respond to a fire within the facility, which may in turn have ramification regarding the optimal number and location of water supplies.

WEPL acknowledges the DFES comment. The proponent will be responsible for engagement with the DFES District Officer during the preparation of the EMP and RMP.

DFES Regional Operations

It is considered that insufficient detail has been provided in the submitted plans for the vehicular access arrangements around the facility. Without detailed plans, general discussion of vehicular access arrangements in the BMP alone is not adequate.

Similarly, there is insufficient detail regarding the siting and design of the proposed water supply options, and it is noted that the documentation does

As above, the BMP acknowledges that there are certain details not currently available at this stage of the project. This includes the layout and design of the internal access roads and water tanks. Table 6 of the BMP stipulates certain access and water requirements that must be met as part of the detailed design stage, in alignment with the REF Guidelines. The BESS has not been assessed as part of the BMP given it is not proposed within a designated bushfire prone area. This is consistent with previous decision making for renewable energy facilities.



DFES comment	WEPL response
not provide any consideration of the water requirements for the proposed BESS and associated buildings. Fire suppression is the last line of defence for BESS installations. Ideally, the BESS should incorporate its own cooling option in the event of fire propagation. This may include a water-mist system with deluge misting nozzles located internally within the BESS enclosure. The system can be connected directly to a water supply such as a dedicated water tank, or alternatively a fire brigade pumping-in breech dry pipe water-mist system can be installed externally to cool the interior of the enclosure. It is considered critical that detailed design work be completed in the first instance to demonstrate to the fullest extent possible how compliance with the bushfire protection criteria will be achieved, so as to reduce the vulnerability of people, property and infrastructure to the threat of bushfire. Additional detailed comments from DFES Regional Operations will be provided once received.	Similarly, fire detection and suppression systems will be determined during detailed design stage and will be documented in the RMP as required by the BMP. Detailed design work will not commence until approvals have been granted which is typical for a proposal of this nature.

DFES Special Operations

Detailed comments from DFES Special Operations will be provided once received.

Comment noted. No action required.

DFES Land Use Planning

It is the responsibility of the proponent to ensure the proposal complies with relevant planning and building requirements. This advice does not exempt the applicant/proponent from obtaining approvals that apply to the proposal including planning, building, environmental health or any other approvals required by a relevant authority under written laws.

Comment noted. All relevant approvals and permits will be obtained by the proponent.



Based on the above, WEPL is of the opinion that the proposed development and BMP adequately respond to the identified bushfire risks through the implementation of a variety of bushfire management measures, taking guidance from SPP 3.7, the Guidelines and the REF Guidelines.

The proposed development adheres to the policy objectives of SPP 3.7 and should be supported by the Shire of Three Springs and approved by the Regional DAP.

If you wish to discuss any of the matters above, please contact me on 0447 751 567 or dylan.w@westenv.com.au

Kind regards,



DYLAN WRAY
Principal Bushfire Consultant
Level 3 BPAD Practitioner



From: Belinda Hill <Belinda.Hill@watercorporation.com.au>

Sent: Monday, 1 June 2026 7:54 AM

To: General <general@threesprings.wa.gov.au>

Subject: A886, A887 OCR267282 Re: Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System) - DAP435473

Hello,

Thank you for the opportunity to comment on the above development application.

The Water Corporation has no objection to the proposal.

The proposal does not appear to have a need for service provision from the Water Corporation, however, should services be required please reach out to the Water Corporation for our advice and assistance.

If you have any queries, please do not hesitate to contact me.

Thank you.

Kind regards,

Belinda Hill

A/Manager - Land Use Planning
Development Services

(08) 9420 3286



*I'm shaping WA's
water future*



In the spirit of reconciliation, Water Corporation acknowledges the Traditional Custodians of Country throughout WA and their enduring connections to land, sea and community. We pay our respects to Elders past and present, and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
1 (16/4/26)	ATCO Gas Australia (ATCO)	ATCO has no objection. Advice Notes: Anyone proposing to carry out construction or excavation works must contact 'Before You Dig Australia' (www.byda.com.au) to determine the location of buried gas infrastructure. Construction and excavation works need to be managed in accordance with the ATCO document Additional Information for Working Around Gas Infrastructure - AGA-O&M-PR24 https://gas.atco.com/en-au/natural-gas/wa-gas-network/working-around-gas-infrastructure.html	Copy of ATCO submission was provided to the applicant who advised as follows in relation to this submission: <i>"Non objection is noted. The proponent is aware of their 'Before You Dig' requirements. The proponent accepts the Advice Notes."</i> The Shire of Three Springs recommends that the following advice note be included with the determination: <i>"(b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences."</i>	Note submission and include advice note as outlined in comment section.
2 (21/4/26)	Western Power	Western Power supports the development and confirms the subject project is currently being assessed for completeness and connection processing. However, Western Power recommends the proponent ensure that connection points, location, design, access and ongoing maintenance and operations of assets is supported and agreed with Western Power. Western Power further recommends the following Condition and Advice Notes prior to development: Condition 1. Prior to development, arrangements shall be made for the provision of an easement pursuant to Section 167 of the <i>Planning and Development Act 2005</i> for existing or planned Western Power distribution and transmission infrastructure being granted free of cost to Western Power. Advice Notes	Copy of Western Power submission was provided to the applicant who advised as follows in relation to this submission: <i>"Western Power's support for the development application is noted. The proponent is aware of their obligations with Western Power. The proponent accepts the Condition and Advice Notes being provided on a notice of determination (approval letter)."</i> <i>A minor modification to the recommended condition is requested:</i> <i>To ensure the condition has a clear and practical trigger, it is requested that the timing of this condition be clarified to apply "prior to first operation of the facility", rather than "prior to development".</i> The Shire of Three Springs recommends that the following condition be included with the determination: <i>"25. Prior to commencement of the use, arrangements shall be made for the provision of an easement pursuant to Section 167 of the Planning and Development Act 2005 for existing or planned Western Power distribution and transmission infrastructure being granted free of cost to Western Power."</i>	Note submission and include condition and advice notes as outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		(i) The development shall be designed and constructed to protect Western Power infrastructure and interests from potential land use conflict. (ii) No development (including drainage, fill, fencing, storage or parking) will be permitted within Western Power line and cable easements or restriction zones without the prior written approval of Western Power. (iii) The applicant should continue to formally progress the Western Power network connection and substation arrangements with Western Power. (iv) Arrangements being made to the specifications of Western Power for the provision of necessary electricity easements as required.	The Shire of Three Springs recommends that the following advice notes be included with the determination: “(a) This is a Development Approval only. The Proponent is advised that it is their responsibility to ensure the proposed development complies with all other applicable legislation, local laws and/or licence/permit requirements that may relate to the development. This includes (but is not limited to) the <i>Environmental Protection (Noise) Regulations 1997</i>, <i>Environmental Protection Act 1986</i>, <i>Rights in Water and Irrigation Act 1914</i>, <i>Aboriginal Heritage Act 1972</i> and <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> amongst others. (b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant’s responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences. (c) The applicant is advised that the proposed works are near an area of high risk. It is recommended that persons planning to build or undertake works in high risk areas near transmission or communication assets act in a safe manner at all times and in accordance with all applicable legal and safety requirements (including the ‘duty of care’ under the laws of negligence, Worksafe requirements and guidelines, Australian Standards and Western Power policies and procedures).”	
3 (23/4/26)	Department of Health (DoH)	No objection with comments and/or recommended conditions and advice notes provided. <u>Infrastructure - Water supply and wastewater disposal</u> State Planning Policy 2.9-Water (SPP2.9) provides for specified site requirements for potable/drinking water supply, recreational water and wastewater disposal.	DoH submission was provided to the applicant who advised as follows (<i>all applicant comments provided in italics</i>) regarding this submission: <i>“Non objection from DoH is noted.</i> <u><i>Infrastructure - Water supply and wastewater disposal</i></u> <i>The proponent is aware on their obligations relating to on-site drinking water, the disposal of wastewater and the use of recycled water. The advice from DOH is noted.</i>	Note submission and include conditions and advice notes as outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		Any drinking water provided on site must meet the health-related requirements of the Australian Drinking Water Guidelines 2011. Any non-drinking water must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration, suitable backflow prevention arrangements in accordance with AS/NZS 3500 Plumbing and Drainage. If there is the disposal of wastewater generated on site and/or from workforce accommodation, it is required to comply with the <i>Health (Treatment of Sewage and Disposal of Effluent & Liquid Waste) Regulations 1974</i> and SPP2.9. An 'Application to Construct or Install an Apparatus for the Treatment of Sewage' is required to be submitted to the Local Government for any wastewater treatment system. If this proposal is likely to generate more than 540L of wastewater per day, the application is required to be forwarded to the DoH for assessment and approval. Further information is available here: Apply to install an on-site wastewater system The proponent will be required to provide the following in accordance with SPP 2.9 and the associated guidelines to ensure the protection of public health from wastewater generated at the premises: Site and Soil Evaluation undertaken by a qualified consultant during the wettest seasonal time of the year (mid-July/August) as per AS/NZS 1547:2012 to ensure the land application area is located and sized appropriately. Detailed plans to scale showing the wastewater apparatus and disposal type. Plans also need to show the proposed building envelopes, proposed and existing onsite wastewater systems, all trafficable areas, parking bays and land application area/s including setback distances to winter creeks and exclusion/riparian zones with all measurements Any use of recycled water on site must be in accordance with the:	<i>It is assumed that the requirement to provide a Site and Soil Evaluation (SSE) and Detailed Plans (to scale showing the wastewater apparatus and disposal type) strictly relates to the 'Application to Construct or Install an Apparatus for the Treatment of Sewage', which is a separate and independent process to the development application.</i> <i>On this basis, it is assumed that no conditions are recommended by DOH for these water matters and the advice is noted."</i> The Shire of Three Springs recommends that the following condition be included with the determination: "11. The design, location, installation and maintenance of on-site wastewater/effluent systems is to be to the approval of the local government and in accordance with relevant legislative requirements."	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		<i>Health (Treatment of Sewage and Disposal of Effluent & Liquid Waste) Regulations 1974,</i> Guidelines for non-potable uses of recycled water in WA https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/water/Recycling/Guidelines-for-the-Non-potable-Uses-of-Recycled-Water-in-WA.pdf and Code of Practice for Reuse of Greywater in WA 2010 https://www.health.wa.gov.au/~media/Files/Corporate/general-documents/water/Wastewater/COP-Greywater-Reuse-2010.pdf <u>Amenity – Medical entomology</u> The Shire of Three Springs require the proponent to ensure the proposed site works and infrastructure do not create additional mosquito breeding habitat as follows: Appropriate location, design and maintenance of project infrastructure to prevent mosquito breeding (e.g. wastewater, stormwater infrastructure); Changes to topography resulting from earthworks must prevent run-off from creating surface ponding as it may become mosquito breeding habitat; Water tanks and other water-holding containers must be sealed or screened to prevent mosquito access and breeding. Regular monitoring for mosquito larvae and treatment with larvicide may also be required. Public Health, Emergency & Hazard Management Emergency incidents with lithium ferrophosphate batteries can result in the generation of flammable gas, electrolyte leakage from damaged, failing or corroding batteries and/or explosion.	<u>“Amenity – Medical entomology (mosquitos)</u> <i>DoH’s comments regarding mosquito breeding risk are noted. The proponent accepts that site works and infrastructure should be designed, located and maintained to avoid creating additional mosquito breeding habitat, including through appropriate stormwater management, avoidance of surface ponding, and suitable design and maintenance of water tanks or water-holding infrastructure. These matters are to be addressed post-development approval through detailed design and relevant construction and/or operational management documentation.”</i> The Shire of Three Springs recommends that the following conditions be included with the determination: “7. Prior to commencement of the development a Stormwater Management Plan shall be submitted to the local government for approval on advice of the Department of Water & Environmental Regulation. 8. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Stormwater Management Plan to the satisfaction of the local government.” <u>“Public Health, Emergency & Hazard Management</u> <i>DoH’s comments regarding potential public health risks associated with BESS infrastructure are noted. Potential emergency scenarios associated with LFP battery infrastructure are acknowledged, including</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		DoH recommends the development of a Hazard Assessment and Emergency Management Plan to address and scope smoke impacts, public health risks and immediate response actions arising from emergency incidents (i.e. a major fire, spill, or leak). Further information should be provided on risks and mitigation measures that will occur to prevent or minimise adverse public health outcomes. The Industry (Australian Energy Council Ltd) guideline (12591546-rep-1_bess-guidance-report-1-compiled.pdf) identifies the absence of published default separation distances around BESS facilities as a significant knowledge gap, which prevents BESS operators from demonstrating suitable safe buffer distances. To address the potential for health risks and impacts on amenity, the Department of Health supports the application of the EPA guideline "Separation Distances between Industrial and Sensitive Land Uses" which recommends that sound site specific technical analysis is undertaken to provide appropriate separation/buffer distances where they may be offsite impacts, including BESS infrastructure (Section 2.1 and 4.1). Whilst the emissions from BESS facilities are likely to be minimal under normal operating conditions, these facilities can contain hazardous materials which if ignited by fault or bushfire, may result in fire which may give rise to significant public health impacts. DoH recommends obtaining advice from relevant agencies with responsibility for regulation and policy development. In consideration of the impacts during potential emergency events, including endorsement of Hazard Assessment and an Emergency Management Plan, further advice should be sought from the following WA agencies: Department of Fire & Emergency Services; Department of Local Government, Industry Regulation & Safety (Building & Energy Division, Dangerous Goods); Department of Energy & Economic Diversification (Energy Policy WA); &	<i>the need for appropriate risk identification, emergency response planning and mitigation measures.</i> <i>These matters, including a 'Hazard Assessment and Emergency Management Plan', are addressed through the detailed design, commissioning and operational phases of the project, rather than as part of the development application assessment and approval.</i> <i>The proponent will continue to manage BESS safety and incident response requirements through the relevant post-approval processes."</i> The Shire of Three Springs recommends that the following conditions be included with the determination: 9. Prior to commencement of the development an updated Bushfire Management Plan, and a Risk Management Plan and Emergency Management Plan shall be submitted to the local government for approval on advice of the Department of Fire and Emergency Services. 10. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Bushfire Management Plan, Risk Management Plan and Emergency Management Plan to the satisfaction of the local government." The Shire of Three Springs recommends that the following advice notes be included with the determination: "(a) This is a Development Approval only. The Proponent is advised that it is their responsibility to ensure the proposed development complies with all other applicable legislation, local laws and/or licence/permit requirements that may relate to the development. This includes (but is not limited to) the <i>Environmental Protection (Noise) Regulations 1997</i>, <i>Environmental Protection Act 1986</i>, <i>Rights in Water and Irrigation Act 1914</i>, <i>Aboriginal Heritage Act 1972</i> and <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> amongst others. (b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		Department of Water & Environmental Regulation (Green Energy Approvals Directorate). Suggested References Consider the findings from the Statement of Technical Findings from the '2021 Victorian Big Battery Fire' VBB StatementOfFindings FINAL 28Sep2021.pdf Full report: Victorian Big Battery Fire: July 30, 2021 The Industry (Australian Energy Council Ltd) guideline	Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences."	
4 (28/4/26)	Department of Mines, Petroleum & Exploration (DMPE)	DMPE has assessed this proposal with respect to mineral and petroleum resources, geothermal energy, and basic raw materials and makes the following comments. From our records there is no impact on any known resources or basic raw materials in this area. However, there are several tenements that are affected. The tenement holders have not been contacted as the impact of this development on exploration is considered to be low. • There is a 0.78% encroachment on granted E70/5876 held by Century Minerals Pty Ltd; Empire Metals Australia Pty Ltd • There is a 48.32% encroachment on granted L70/153 and there is a 2.58% encroachment on pending L70/157 held by Extension Hill Pty Ltd. • There is a 0.21% encroachment on petroleum exploration permit EP498 held by Southern Sky Energy Pty Ltd Of particular interest to DMPE are the 2 miscellaneous licence tenements, granted L70/153 and pending L70/157, both held by Extension Hill Pty Ltd. These tenements are designed as possible easements for powerlines and roads to connect to the Western Power electrical power substation on Lot 22. There is a potential synergy with power supply and the planned intention of the tenements to supply mining operations. Consultation maybe beneficial for efficient use of power supply from this proposal. DMPE lodges no objections to the above development application.	Copy of DMPE submission was provided to the applicant who advised as follows in relation to this submission: <i>"Non objection from DMPE is noted. The proponent notes DMPE's advice that there is no impact on known resources or basic raw materials, and that the impact on exploration is considered to be low. DMPE should have due regard to the rights and the existing and planned land use(s) of the freehold landowner when it assesses mining or exploration tenement applications to third parties over privately owned land. The advice for consultation with relevant tenement holders, including in relation to potential power supply synergies, is noted."</i> The current DMPE framework allows for the scenario whereby mining proponents, may seek to operate outside of the planning system and utilise miscellaneous licence tenement applications to investigate activities such as railways, pipelines, roads and powerlines whereby unconsulted and impacted landowners are required to engage lawyers at their expense and appear in court should they be in objection. It can also result in applications and approvals made under planning legislation being at odds with approvals that may have been issued under mining or petroleum legislation. The Shire of Three Springs recommends that the following advice notes be included with the determination: “(a) This is a Development Approval only. The Proponent is advised that it is their responsibility to ensure the proposed development complies with all other applicable legislation, local laws and/or licence/permit requirements that may relate to the development. This includes (but is not limited to) the <i>Environmental Protection (Noise) Regulations 1997</i>, <i>Environmental Protection Act 1986</i>,	Note submission and include advice notes as outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
			<i>Rights in Water and Irrigation Act 1914, Aboriginal Heritage Act 1972 and Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007 amongst others.</i> (b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences."	
5a (30/4/26) & 5b (4/5/26)	Main Roads Western Australia (MRWA)	MRWA has no objections, to the application subject to the following conditions being imposed: Conditions 1. The developer must ensure the proposed construction and operational transport routes proposed for use are deemed suitable by the Shire of Three Springs & MRWA <u>Justification for Condition</u> The development is the nexus for the works/upgrades to be completed. Condition has been applied to reflect MRWA & the Shire's roles as the road authorities.	Copy of MRWA submission was provided to the applicant who advised as follows in relation to this submission: <i>"MRWA's non-objection is noted. As a general comment, many of the considerations raised by MRWA relate purely to construction traffic. It is accepted that this warrants consideration. However, this is appropriately handled through a Traffic Management Plan for the construction phase of the project.</i> <i>Response to Proposed Conditions</i> <i>Condition 1 is not supported in its current form and is requested to be replaced with a condition requiring a traffic management plan for the construction stage instead. Reasoning is as follows:</i> <i>The roads forming part of the RAV Network have been assessed and approved for use by specific heavy vehicle classes by the responsible authority in accordance with established policies and procedures (MRWA). The proponents have the right to use appropriate RAV vehicles within the set conditions on the appropriate RAV network without undertaking any assessments or permission. Accordingly, the developer should not be required to undertake additional assessment and obtain additional approvals from the Shire or MRWA. If any part of the RAV Network is found to be below the required standard, it is the responsibility of the relevant authority to address the issue, rather than restricting road users who are operating in compliance with applicable regulations.</i>	Note submission and include conditions and advice notes as outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		2. The applicant is required to submit an application form to undertake works within the road reserve prior to undertaking any works within the Brand Highway road reserve. Application forms and supporting information about the procedure can be found on the MRWA website>Technical & Commercial>Working on Roads. <u>Justification for Condition</u> Public safety and protection of the Primary Regional Road Reservation. 3. A transport management plan in conjunction with an application for a permit that requires vehicle and machinery access and movement for Restricted Access Vehicles shall be submitted for approval to the satisfaction of MRWA. <u>Justification for Condition</u> Public safety and protection of the Primary Regional Road Reservation.	<i>More specific details will be available through a construction management plan which the proponent expects would be a separate condition of approval.</i> <i>The proponent acknowledges the role of the Shire of Three Springs and MRWA as relevant road authorities and will continue to liaise with those authorities as required in relation to construction traffic management and heavy vehicle access routes. These matters can be appropriately addressed through the existing heavy vehicle regulatory framework and any required Construction Traffic Management Plan process.</i> <i>Condition 2 should be modified to an advice note instead. It is not an appropriate planning condition because: No works are proposed within the Brand Highway road reserve as part of this application, which is located more than 60km south-west of the subject site and does not form part of the proposed site access or works area. Condition 2 does not meet the test of need (refer to DAP Practice Notes: Making Good Planning Decisions) as it relates to works within the Brand Highway road reserve, however, no such works are proposed, required or relied upon as part of this development application. There is therefore no identified planning impact, road reserve approval requirement or development-related need that justifies imposing the condition. The proponent acknowledges that any future works within a MRWA road reserve would require the appropriate approvals prior to those works being undertaken. However, that requirement already exists under separate road reserve approval processes and would be duplicated if imposed as a condition of this development approval.</i> <i>Condition 3 is requested for removal or alternatively, as an advice note instead, as outlined in the reasons below: The proponent acknowledges that any RAV movements requiring a permit must be managed through the applicable MRWA Heavy Vehicle Services approval process, including a supporting Transport/Traffic Management Plan. Condition 3 does not meet the test of need as the requirement for RAV permits and any supporting transport/traffic management documentation is already addressed through the established heavy vehicle regulatory</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		Advice a) Condition 1 and 2: The intersections and routes between the Local Government roads and the Midlands Road must be upgraded to facilitate the transport of solar farm and battery storage components. b) Condition 3: Heavy vehicle access must be approved from MRWA where the routes relating to the development application are not approved for the proposed heavy vehicle combinations including Over Sized, Over Mass vehicles. MRWA is the relevant authority to issue such approvals. Such an approval may be subject to any necessary intersection upgrades being undertaken at the applicant's expense to the satisfaction of MRWA. The applicant is advised to contact MRWAs' Heavy Vehicle Services branch to ascertain any approval requirements. Information can also be found on the Heavy Vehicles Access Requirements in WA section of the MRWA website. MRWA response conditions are based on the information contained in the Traffic Impact Statement (TIS) supplied with the application. However, there are some issues with the proposals, assumptions, and technical validity of the TIS. As a courtesy to the Shire, we would like to provide some commentary on these issues so you can use them to inform the decision and conditions. Please note our following comments –	<i>framework administered by MRWA. There is therefore no identified planning impact, approval requirement or development-related need that justifies imposing the condition as part of this development approval. The matter would be more appropriately addressed as an advice note reminding the applicant that RAV movements must comply with applicable MRWA Heavy Vehicle Services requirements</i> <i>Advice Notes Response</i> <i>Advice Note (a) is unreasonable and requested for removal. Roads forming part of the RAV Network have been previously assessed and designated as suitable to specified types/classes of RAV vehicles by the relevant authorities. The maintenance/servicing/upgrade of these roads are therefore a matter for the relevant authority to address and not the road users. The proponent will utilise parts of RAV Network in line with the applicable classifications and conditions.</i> <i>Advice Note (b) is noted and accepted by the applicant but should not require the associated condition is outlined above.</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		<u>Operational Traffic Assessment</u> This section of TIS appears to be overly generic and primarily considers routine staff vehicle movements. For a development of this scale, the assessment should consider periodic maintenance activities over the life of the project. These may include heavy vehicle movements associated with HV cable replacement, inverter maintenance or replacement, battery component replacement at regular intervals, and other non-routine maintenance activities. The TIS should be updated to provide a more realistic representation of operational-stage traffic. <u>Construction Traffic – Potential Underestimation</u> The construction-stage traffic generation appears to underestimate the likely heavy vehicle (HV) task. Given the scale of the project, the number of HV movements associated with transport of solar infrastructure, battery units, transformers, cabling, and associated equipment from port to site is likely to be higher than presented. The applicant should review and justify the assumed construction-stage HV traffic volumes, including peak delivery periods. <u>Turn Treatment Warrant Assessment</u> The TIS states that the turn warrant assessment results in SL and SR outcomes, however the actual warrant	<u>Operational Traffic Assessment</u> <i>As stated in TIS, the Solar Farm & BESS facility is proposed to be unmanned hence no regular operation stage traffic is anticipated or required. Occasional maintenance and service-related traffic will occur from time to time. This type of activity will be random and only as required hence it is not quantifiable, nor would this type of vehicle have any impacts on the operations of the road network. Additionally, the type of maintenance vehicles that will be used are those vehicles already permitted to use the road network.</i> <u>Construction – Potential Underestimation</u> <i>We disagree with MRWA's assertions on this matter. The construction stage traffic is based on advice and current information known by the construction contractor. In any case, a Traffic Management Plan for the construction stage of the project will confirm heavy vehicle types and frequency, transport routes and other relevant information. These matters are more appropriately resolved prior to construction, once the construction methodology, delivery schedule and transport operators are confirmed.</i> <i>It is also noted that the construction workforce is expected to be transported to and from the site by bus, which will reduce the number of private light vehicle trips generated during the construction phase. Heavy vehicle movements associated with major equipment deliveries are expected to occur over the construction period and will be managed through the Construction Traffic Management Plan, including confirmation of delivery routes, staging, timing and any required heavy vehicle permits.</i> <i>If required, the proponent can further review and confirm the assumed heavy vehicle volumes and peak delivery periods as part of the Construction Traffic Management Plan prior to construction commencing, which is the appropriate stage to confirm this level of detail once the information becomes known.</i> <u>Turn Treatment Warrants</u> <i>As outlined in the TIS, the Solar Farm and BESS facility is proposed to operate without onsite staff; therefore, no regular operational traffic is</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

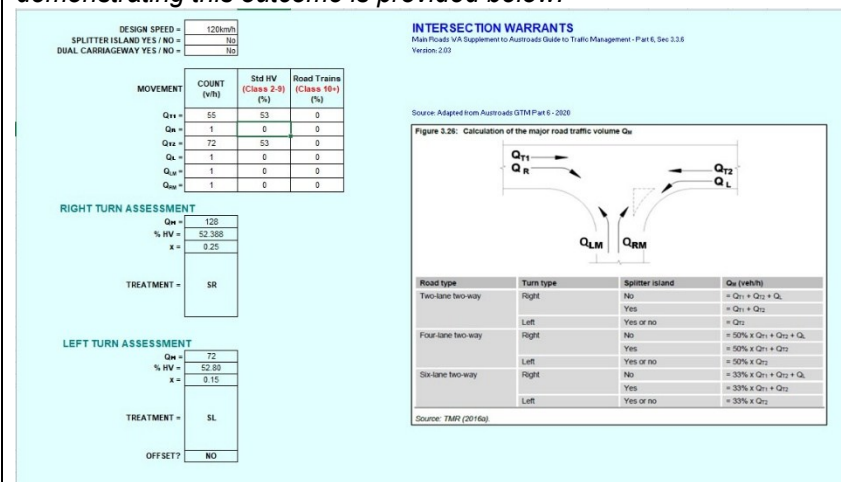
Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
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calculations have not been included. The applicant should provide the full turn treatment warrant assessment in TIS for review. Noting that the proposed access is located on a Local Government road, final agreement on the treatment will be subject to the requirements of the Shire.

Safe Intersection Sight Distance (SISD) assessment

There is no SISD assessment in the TIS. MRWA is concerned because the operating speed (85th Percentile) far exceeds the posted speed. MRWA traffic data for Morawa-Three Springs Road in the vicinity of the site indicates an 85th percentile speed of approximately 122.5km/h, and AGRD Part 4A requires SISD to be assessed using the operating (85th percentile) speed. By calculation, the required SISD is approximately 390m for trucks and 351m for cars, subject to confirmation of the adopted deceleration factor and grade. The applicant should therefore update the TIS to include the SISD assessment using the appropriate 85th percentile speed and demonstrate that the proposed access location

expected. For sensitivity purposes, the turn treatment assessment assumed 2 maintenance vehicles entering and exiting the site during peak network periods. Under this scenario, the anticipated traffic activity at the crossover results in SL and SR movements only, which do not warrant any auxiliary treatments (and accordingly, no calculation sheet was included in the TIS). However, as requested, the calculation sheet demonstrating this outcome is provided below.



SISD assessment

The traffic survey for Morawa-Three Springs Road was conducted at SLK 1.72, approximately 3.3km west of the site, and is therefore not directly applicable in this case.

However, the proposed northern and southern site access points are situated along a straight and relatively level section of Morawa-Three Springs Road. The nearest horizontal curves are located about 650m east of the southern access and 400m east of the northern access. As a result, a minimum available Safe Intersection Sight Distance (SISD) exceeding 400m is achievable in both directions, and the sight distance is effectively unconstrained.

Based on the adopted 85th percentile speed of approximately 122.5km/h, the corresponding SISD requirements of 351m for passenger vehicles and 390m for heavy vehicles are satisfied. Accordingly, both

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		satisfies the required sight distance for the relevant design vehicle. <u>Swept Path Assessment</u> The TIS does not include swept path analysis. The applicant should provide swept path assessment for the proposed site access, the Franklin Road-Midlands Road intersection, the Telegraph Road-Franklin Road intersection and other key intersections along the haulage route. This assessment should demonstrate that the largest design vehicle, including RAV6 and RAV7 vehicles, can be safely accommodated. <u>Franklin Road-Midlands Road & Telegraph Road-Franklin Road Intersections</u> The TIS does not adequately assess the suitability of the Franklin Road Midlands Road & Telegraph Road-Franklin Road intersection for the proposed construction traffic. Given the existing intersection geometry, a turn treatment warrant assessment and SISD should be undertaken for this intersection, considering the additional light and heavy vehicle traffic generated during the construction phase. The TIS should demonstrate whether the existing intersection configuration is suitable or whether upgrades are required. <u>RAV Network Conditions Franklin Road & Telegraph Road</u> The TIS identifies the surrounding road network as RAV6 and RAV7, however, it does not acknowledge the operational constraints associated with Franklin Road and Telegraph Road. These routes are subject to specific RAV Network conditions, including low-volume route classification, speed restrictions, controlled two-way	<i>proposed access points comply with SISD criteria in accordance with AGRD Part 4A.</i> <u>Swept Paths</u> <i>Access to both sites will be designed to accommodate the largest vehicles expected during the construction and operational phase. As there are no physical limitations affecting the access design, no constraints are anticipated. Detailed design of the site crossovers will be undertaken at a later stage, at which point they will be developed for the appropriate Design Vehicle in accordance with the relevant Shire's access design requirements.</i> <i>With regard to swept path requests for RAV 6 and 7 vehicles at the Franklin Road/Midlands Road intersection, the Telegraph Road/Franklin Road intersection, and other intersections along the haulage route, such assessments are not considered necessary as the relevant heavy vehicles are expected to operate through these intersections in accordance with their designated RAV Network classification and associated operating conditions.</i> <u>Franklin Road-Midlands Road & Telegraph Road-Franklin Road Intersections</u> <i>Please see responses above.</i> <u>RAV Network Conditions - Franklin Road and Telegraph Road</u> <i>A Traffic Management Plan for the construction stage of the project (including OSOM transport task) will detail relevant vehicle types, frequency details, transport routes and other relevant information. These matters are more appropriately resolved prior to construction, once the construction methodology, delivery schedule and transport operators are confirmed. This type of transport information is beyond the scope of a</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		vehicle interaction, and limitations during wet conditions, particularly on unsealed sections. These constraints indicate that the route is operationally limited rather than a standard freight corridor. The TIS should be updated to acknowledge these conditions, assess their impact on construction logistics, confirm whether the route is suitable for the proposed heavy vehicle and OSOM transport task and address any necessary works required to make the route acceptable (to the satisfaction of the Shire of Three Springs and MRWA Heavy Vehicle Services). <u>School Bus route Three Springs-Morawa Road</u> Three Springs-Morawa Road carries a conditional RAV approval which states "Operation is not permitted while the school bus is operating on the road. Operators must contact the relevant schools and obtain school bus timetables; or where direct contact can be made with the school bus driver, operation is permitted once the school bus driver confirms all school drop-offs/pick-ups have been completed on the road." The TIS does not identify or assess the interaction between the proposed construction traffic and existing school bus routes in the area. It is understood that sections of Three Springs-Morawa Road form part of an active school bus route, which will also be used by RAV6 and RAV7 vehicles associated with the development during the construction phase. The TIS should acknowledge this interaction and assess the associated safety risks, particularly during school bus operating hours. Appropriate mitigation measures should also be outlined, such as scheduling of heavy vehicle movements outside school bus times, implementation of traffic management controls where required, and coordination with relevant stakeholders to minimise potential conflicts (to the satisfaction of the Shire of Three Springs and MRWA Heavy Vehicle Services).	<i>TIS at the DA stage, as prescribed under the WAPC's Transport Impact Assessment (TIA) Guidelines.</i> <u>School Bus route – Three Springs-Morawa Road</u> <i>RAV Network conditions, including school bus operation restrictions, will be taken into account during the preparation of a Traffic Management Plan for the construction stage of the project, which is the more appropriate phase. These operational details are more appropriately resolved once the construction program, delivery schedule and transport operators are confirmed.</i> <i>This type of transport information is beyond the scope of a TIS at the DA stage, as prescribed under the WAPC's Transport Impact Assessment Guidelines.</i> <u>Summary</u> <i>It is considered the matters queried by MRWA can be addressed through a Traffic Management Plan for construction stage. We invite the Shire to recommend a condition which requires the traffic management plan (potentially forming part of a broader construction management plan) be required prior to commencement of works."</i> The Shire of Three Springs recommends that the following conditions be included with the determination: 5. Prior to the commencement of the development a Construction Management Plan shall be submitted to the local government for approval and approved prior to commencement of works. 6. The development shall be completed in accordance with the approved Construction Management Plan to the satisfaction of the local government."	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
			“12. The upgrading of Geebulla Road between the Perenjori-Three Springs Road and the development's vehicle access into Lot 201 to the satisfaction of the local government. 13. Prior to commencement of the development an updated Traffic Management Plan shall be submitted to the local government for approval on advice of Main Roads WA. 14. Throughout the construction phase of the development the landowner/applicant shall implement the recommendations of the approved Traffic Management Plan to the satisfaction of the local government. 15. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Traffic Management Plan relating to the operational phase of the development to the satisfaction of the local government. 16. Prior to the commencement of the use all vehicle access point(s) onto the local road network, car parking areas and internal vehicle accessways shall be constructed to the satisfaction of the local government. 17. The installation of any directional/traffic/warning/safety signage in the vicinity of the development's access point onto the road network, and relating to the development, shall be to the satisfaction of the local government. 18. All parking of vehicles associated with the development shall be provided for within the property boundary and not the road reserve. 19. The applicant shall be responsible for the upgrade, repair, reinstatement or replacement of any road infrastructure that is damaged, becomes unsafe or fails to meet appropriate engineering standards where the damage to the road network is caused by reason of use of the road in connection with the approved development, to the satisfaction of the local government (or where agreed to by the local government the applicant may instead arrange payment to the local government for such repair, reinstatement or replacement works to be undertaken).” The Shire of Three Springs recommends that the following advice notes be included with the determination:	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
			(b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences. (f) The applicant will need to consult with the Main Roads WA Heavy Vehicle Services branch to ascertain any approval requirements that may be required for their proposed heavy vehicle combinations, transport routes and operations. (i) In relation to conditions 13 & 14 the Traffic Management Plan shall address the following associated with the construction of the development or any other matters considered relevant by the local government. i) construction vehicle route(s) and traffic management; ii) size and frequency of construction vehicles; iii) road upgrades/repairs and timing of works associated with the construction of the development. (j) The Shire is unable to provide guarantee of all-weather access on its unsealed road network, and in the event that the applicant requires all-weather access to its site, the applicant is required to seal the road network to the local government's satisfaction to connect into the existing sealed road network."	
6 (1/5/26)	Department of Biodiversity, Conservation & Attractions (DBCA)	DBCA has no objections. It is anticipated that the proposed solar farm and battery storage system and any associated environmental impacts will be appropriately managed through the existing planning framework.	Copy of DBCA submission was provided to the applicant who advised as follows in relation to this submission: <i>"DBCA's non-objection is noted."</i>	Note submission
7 (4/5/26)	Department of Water & Environmental	DWER has identified that the proposed activity has the potential for impact on environment and water resource values. Key issues and recommendations are provided below, and these matters should be addressed.	DWER submission was provided to the applicant who advised as follows (<i>all applicant comments provided in italics</i>) regarding this submission:	Note submission and include condition and advice notes as

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
	Regulation (DWER)	<u>Noise</u> DWER's Environmental Noise Branch (ENB) has reviewed the environmental noise assessment (ENA) submitted with the development application report and provides comments below. Noise criteria The proponent identified the nearest noise sensitive receivers as follows: • Single dwelling on Lot 201, approximately 2km to the northwest of the solar farm. This receiver is labelled as "R2" in the ENA. • Multiple dwellings along Morawa-Three Springs Road, approximately 2.8km to the west of the BESS. The closest of these receivers is labelled as "R1" in the ENA. Although the single dwelling to the northwest (R2) is on the same Lot 201 as the solar farm, it could be considered a separate noise sensitive premises for the purposes of the <i>Environmental Protection (Noise) Regulations 1997</i> (Noise Regulations). The ENA identified the Noise Regulations as being the applicable criteria at both receivers R1 and R2. On the basis the land surrounding the Proposal would be considered noise sensitive (i.e. rural land), an assigned level of 60 dB LA10 would also apply at the Proposal's development area boundaries. Cumulative noise emissions, in accordance with regulations 7(1) and 7(2), may also require consideration, given the solar farm and BESS proposal located further west. Noise modelling The ENA lacks details of the noise modelling undertaken, making it difficult to comment on the veracity of the predicted results. ENB understands this is a preliminary assessment such that not all details of the noise sources maybe known. Nonetheless, the ENA is to present, as a minimum, the following information: The prediction algorithm and ground factor (G) used. Although not explicitly referenced in the ENA, it appears the	<u>"Noise</u> <i>Noise criteria commentary raises no queries. The 60 dB(A) at boundaries is noted, however, not applicable in this instance – which is demonstrated in the noise contour plot. Cumulative noise sources "may" be applicable – however – this is considered highly unlikely, and given the predicted noise levels, also unlikely to be an issue regardless. The details of "noise modelling" comments provided by the DWER have been included in a revised acoustic report. It is noted that the conclusion of the DWER that "the Proposal can comply with the requirements of the Noise Regulations at the receivers identified" is commensurate with the report findings – as is the commentary that our work is "preliminary" in nature due to the lack of detailed information at this stage of the project. It is noted that the methodology/approach utilised for the preliminary assessment is conservative - so the need for further assessment would likely be at the discretion of the decision making body for the project. Herring Storer Acoustics has prepared a revised Acoustic Report in response to the points raised by the Department's ENB (attached)."</i> The Shire of Three Springs recommends that the following condition be included with the determination: "22. Prior to the commencement of works associated with the approved development or the issue of a Building Permit (whichever occurs first), the Noise Assessment shall be reviewed and submitted to, and approved by the Shire of Three Springs, on advice of the Department of Water and Environmental Regulation." The Shire of Three Springs recommends that the following advice note be included with the determination: "(o) In relation to condition 22 the reviewed Environmental Noise Assessment shall include: (i) Assessed noise levels for all nearby sensitive receivers (including the residence upon Lot 200 (DP420979) Perenjori-Three Springs Road that is 2.6km west of the BESS). (ii) Background noise levels. (iii) Operating noise levels of equipment selected for installation. (iv) Assessment of noise levels for worst-case scenario of night-time at 100% capacity operation.	outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		CONCAWE algorithm, as implemented in the software SoundPLAN were selected. However, given the separation distances are over 2km, the ISO 9613-2:2024 algorithm with a ground factor of 0.5 may be more appropriate. The number of sources of each type included in the model. While the ENA assumed 252 BESS, it is not clear how many “inverters” and “substation” were included in the model. It is also not clear whether the power conversion systems (PCS) referred to in the development application report were included in the model (e.g. inverters?). • Noise sources’ spectral data. • The modelled height of the individual noise sources and their type e.g. point source, ‘box’ source. • Noise contours for all modelled scenarios. • Details of any barrier or directional effects (other than from topography). The sources sound power levels presented in Table 4.1 of the ENA appear reasonable and are comparable to similar projects. The levels predicted at R1 and R2 appear reasonable given the separation distances, and the inclusion of the tonal adjustment is supported. However, these levels and the levels at the development area boundaries will need to be confirmed as the proposal progresses to detailed design, based on the above comments. <u>Conclusion</u> Based on the information provided, it is likely the noise emissions from the proposal can comply with the requirements of the Noise Regulations at the receivers identified. However, this is a preliminary assessment and noise levels will need to be confirmed as the proposal progresses to detailed design. <u>Waterways Protection</u> Various minor waterways are located within the project area. Although these waterways may not be impacted by	(v) Recommended measures to reduce any noise level exceedances. Any recommended measures to reduce noise level exceedances identified in the approved reviewed Noise Assessment shall be implemented to the satisfaction of the Shire of Three Springs, in consultation with the Department of Water and Environmental Regulation, prior to the operation of the approved development.” <u>“Waterways Protection</u> DWER’s comments regarding minor waterways within the project area are noted. The proponent accepts that care should be taken during construction to minimise potential impacts on waterways, riparian	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		the proposed works, it is recommended that care is taken during construction to minimise the risk of impact. The proponent should be encouraged to implement best management practices during future activities to minimise impacts on riparian vegetation and surface water quality. Best management practice include (at minimum): • Disturbance to riparian vegetation should be avoided to maintain foreshore stability and protect important riparian habitats. • Constructing any unavoidable creek crossings on relatively straight sections of the watercourse, not on meander bends. • Limit creek crossings, minimize impact on water ways banks and vegetation • Undertake revegetation of disturbed areas. A Bed and Banks permit under the <i>Rights in Water and Irrigation Act 1914</i>, may be required for the interference with the bed and bank of any watercourse. For more information, it is recommended that the proponent contact the Mid-West Gascoyne Water Licensing team. <u>Threatened Ecological Communities</u> Priority 3 (P3) Threatened Ecological Communities (TECs) Eucalypt woodlands of the Western Australian Wheatbelt are present within both lots. If you have questions about the threatened fauna and TECs on your land, recommend you contact the DBCA's Species and Communities Program.	<i>vegetation and surface water quality, noting the subject site's proximity to the salt lake system. The proponent will implement best management practices where possible and applicable."</i> The Shire of Three Springs recommends that the following condition be included with the determination: "7. Prior to commencement of the development a Stormwater Management Plan shall be submitted to the local government for approval on advice of the Department of Water & Environmental Regulation. 8. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Stormwater Management Plan to the satisfaction of the local government." <u>"Threatened Ecological Communities (TEC)</u> <i>A desktop review of available online mapping and information indicates that portions of the subject site may contain Threatened Ecological Communities (TEC). However, the subject site has been progressively cleared and is a significantly modified landscape as a result of historical agricultural and rural land uses. The proposed development area is generally cleared, with no clearing of existing native vegetation proposed and only minimal shallow earthworks required. As the proposal avoids clearing native vegetation, no direct impacts are anticipated to TECs, environmentally significant flora species, fauna habitat, ecological linkages or areas of conservation value. The development is also not expected to result in further fragmentation of remnant vegetation or loss of habitat. Noting the above, it is unlikely that the proposal will disturb any TEC, if confirmed to be present on the site. During detailed design and</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		<u>Water Licencing</u> The proposed activities occur within the proclaimed Gascoyne groundwater area subject to licensing requirements under the <i>Rights in Water and Irrigation Act 1914</i>. There are 2 ground water licenses on Lot 201 Perenjori-Three Springs Road GWL65325(7) & GWL200126(1), should the applicant seek to use this water for construction or ongoing use an alteration to the groundwater licenses may be required. It is recommended that the proponent contact the Mid-West Gascoyne Water Licencing team regarding any groundwater licensing requirements. DWER should be notified of any modifications to the development application that may have implications on aspects of environment and/or water management, to enable the implications to be assessed.	<i>construction, further advice will be sought from an environmental consultant to ensure the development avoids any TEC disturbance.</i> <u>Water Licencing</u> <i>Requirements for a water licence under the Rights in Water and Irrigation Act 1914 (RIWI) are noted."</i> The Shire of Three Springs recommends that the following advice notes be included with the determination: "(a) This is a Development Approval only. The Proponent is advised that it is their responsibility to ensure the proposed development complies with all other applicable legislation, local laws and/or licence/permit requirements that may relate to the development. This includes (but is not limited to) the <i>Environmental Protection (Noise) Regulations 1997</i>, <i>Environmental Protection Act 1986</i>, <i>Rights in Water and Irrigation Act 1914</i>, <i>Aboriginal Heritage Act 1972</i> and <i>Dangerous Goods Safety (Storage and Handling of Non-explosives) Regulations 2007</i> amongst others. (b) The applicant is advised that this planning approval does not negate the requirement for any additional approvals, and adherence to due diligence, which may be required under separate legislation. This including, but not limited to, the obtaining of any required approvals from the Department of Health, the Department of Energy & Economic Diversification, the Department of Local Government, Industry Regulation & Safety, the Department of Water & Environment Regulation and Main Roads WA and consulting of Before You Dig Australia. It is the applicant's responsibility to obtain any additional approvals, and undertaking of due diligence, required before the development/use lawfully commences."	
8 (6/5/26)	Telstra	Telstra has no objections. Telstra can utilise statutory notices in the future if it wants to access the land for the purposes of any inspection, maintenance and installation of low impact facilities.	Copy of Telstra submission was provided to the applicant who advised as follows in relation to this submission: <i>"Non objection is noted."</i>	Note submission
9 (4/5/26)	Department of Primary Industries &	Recommendations: DPIRD encourages the proponent to: <u>Community Benefit Fund</u> Follow the Community Benefits Guideline: Realising the Opportunities of the Energy Transition and work with the	Copy of DPIRD submission was provided to the applicant who advised as follows in relation to this submission: <i>"Community Benefits</i> <i>DPIRD's advice on the Community Benefits Guideline is noted.</i>	Note submission and include conditions and advice notes as

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
	Regional Development (DPIRD) & Mid West Development Commission (MWDC)	Shire of Three Springs to develop a local benefits package, while being flexible and open to suggestions for improved local benefits. There is no commitment to establishing a Community Benefit Fund or serious consideration of factors outlined in Powering WA's Guideline on Community Benefits for Renewable Energy Projects published in February 2026 but also released in draft form in June 2025 as part of a consultation process. Given the Guideline is now published it could be considered to carry more weight, and proponents should take the recommendations more seriously. While not a planning matter, there is no explicit mention of the new Community Benefits Guidelines and how the proponent would seek to implement.	<i>The proponent has engaged with the Shire and is in the process of engaging with the Traditional Owner group, the Yamatji Corporation.</i> <i>The proponent and the project team acknowledge the proposal will introduce new workforces which place demands on local infrastructure and services. The proponent believes in a shared approach to economic benefits and will propose a voluntary contribution.</i> <i>In principle this contribution would be in the order of:</i> <i>\$300,000 annually to the Shire – directed to local services and infrastructure;</i> <i>An additional contribution to the Traditional Owners with figures to be confirmed following consultation.</i> <i>Exact details and agreements for these contributions will be confirmed through later stages of the project.</i> <i>There is no planning requirement for community contribution and this is being approached as a voluntary community contribution."</i> The planning system has failed rural and regional communities in regards to large gas, renewable energy and mineral projects. Whilst it is recognised that these projects may have a wider state benefit, there can be a very limited to negative return for the communities in which these projects operate. Whilst major projects have an underlying objective of maximising the proponent's interests there is still ability for it to have regard and concern for the wider social context of the region in which it is located. Without such regard it is reasonable to ask; <i>'if the project were to not proceed would the local community be any the worse off?'</i>, indeed it might be better off as the local community will bear the impacts to its own transport activities and networks, particularly during the construction phase, the impact on its rural amenity through visual, noise, dust and light impacts, and the environmental risks both during the operation and post-operation legacy phases when a proponent, who is from outside the region, has made their profits and moved on. It has been recognised that the State Government should develop a mechanism whereby major project proponents are required to engage with local communities to ensure a lasting positive community legacy for their projects. The ongoing delays in this area in the face of the current	outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
			significant activity in the gas and renewable energy sectors in rural and regional areas is resulting in poor outcomes for these disadvantaged areas and reinforces an underlying trend of centralisation and neglect for regional services. The release of the draft Renewable Energy Code for comment from 12/12/25-10/4/26 is a step in this direction. Local governments have made submissions upon the draft Renewable Energy Code seeking their modification to include a mandatory requirement for proponents to submit Social Impact Assessments and enter into Community Benefit Agreements for all renewable energy developments above 10MW with local governments. Whether this call will be heeded remains to be seen. There is currently no statutory planning mechanism by which a significant applicant must be involved in the local community and to ensure there is some form of social benefit to those who will bear the impacts and who are already disadvantaged in access to services and facilities compared to urban areas. The Community Benefits Guideline for Large-Scale Renewable Energy Projects in the South West Interconnected System recommends that an annual community benefit fund should be as follows: Solar Project over 10MW - \$750 per MW per annum; BESS Project over 10MW - \$125 per MW per annum. The Shire of Three Springs recommends that the following advice note be included with the determination: “(n) <i>The applicant shall enter into a contribution agreement towards community, social or other infrastructure/programs that will benefit the local community. The agreement should establish the process by which the contributions should be directed to the Shire of Three Springs Medical Community Benefit Scheme or other local groups/ventures deemed appropriate. The agreement should give due regard for best available practice including the Community Benefits Guideline for Large-Scale Renewable Energy Projects in the South West Interconnected System and the contribution value</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		<u>Worker Accommodation</u> Carefully analyse and plan how its accommodation needs will be met given concerns about the availability of local housing and worker accommodation. The proponent is proactively investigating 3 options and locations for workforce accommodation. Accommodation in Three Springs is currently very tight with the CEL-North work ongoing and numerous other projects in planning/development. This should be given serious consideration. Conscious of this requirement being put on the Tathra Wind Farm in Shire of Carnamah recently one of the conditions is No.23 passed as amended is: <i>“Prior to construction commencing on-site, an Accommodation Strategy shall be developed in consultation with the Local Government. The Accommodation Strategy shall be implemented to the satisfaction of the Local Government.”</i> With the advice note mentioning: <i>“12. With regard to the Accommodation Strategy the following should be included:</i> i Accommodation of workers during construction phase including an assessment of options; and ii Accommodation of operational staff including measures to promote local residency choice for operational staff” While not a planning matter, there is no explicit mention of the new Community Benefits Guidelines and how the proponent would seek to implement <u>Local Businesses</u>	<i>per megawatt (\$/MW) formula benchmark of the New South Wales Benefit Sharing Guideline.”</i> This advice note is similar to those applied to other recent DAP determinations in the Shire of Three Springs for a Power Generation application on 13/11/24 (DAP/24/02759), a Power Transmission alignment on 15/1/25 (DAP/24/02787) and a Solar Farm/BESS application on 16/9/25 (DAP/25/02930). <u>“Workforce Accommodation</u> <i>The proponent acknowledges DPRI’S advice on planning for workforce accommodation needs, which the proponent has already given thorough consideration to accommodation requirements for the project. The proponent is proactively investigating 3 options and locations for workforce accommodation, which will be either within the Three Springs townsite or 2 other nearby locations. The final accommodation arrangements will be progressed as part of project delivery planning and if required, separate application(s).</i> <i>“The feedback and advice from the Mid-West Development Commission in Attachment 2 of DPIRD’s referral responses is acknowledged.”</i>	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		Contact DPIRD's Local Adviser Network to find out how they might best engage local regional businesses to supply the project. DPIRD notes the solar farm proposal presents a positive renewable energy development for the State with renewable energy to feed into the SWIS. However, in support of the Mid West Development Commission comments (Attachment 2), DPIRD is concerned about the lack of proposed tangible community benefits for the Three Springs community or Aboriginal people representing the area. Opportunities for, and commitment towards, supporting local contractors has also not been considered and should also be addressed. <u>Biosecurity</u> DPIRD recommends approval be conditional on the preparation of an operational Biosecurity Management Plan outlining arrangements for machinery inspection, equipment cleaning, ongoing monitoring of weeds across the site, contingencies, reporting, and the identification of responsibilities for various parties. DPIRD recommends that a series of declared weed surveys be conducted across different seasons of the year. This will assist in identifying any species already present on the property. Monitoring undertaken after completion of the construction phase will determine whether any species have been introduced to the site and require management. DPIRD has assisted other solar farms to manage declared species that were either missed during vegetation surveys or introduced during construction. DPIRD recommends that a biosecurity clean down area is identified on site. The Development Application states that "four construction laydown areas will be established" (p14). These areas could also be designated as biosecurity clean down areas. Any machinery or equipment arriving at or leaving the construction site should be brought to a	<u>Biosecurity</u> <i>"The proponent also notes DPIRD's recommendations regarding biosecurity, declared weed surveys, clean-down areas, surface water and wind erosion management, and decommissioning. For clarification, these matters can only be addressed through detailed design, construction planning, operational procedures and future decommissioning planning, rather than as conditions of development approval."</i> The Shire of Three Springs recommends that the following conditions be included with the determination: "5. Prior to the commencement of the development a Construction Management Plan shall be submitted to the local government for approval and approved prior to commencement of works. 6. The development shall be completed in accordance with the approved Construction Management Plan to the satisfaction of the local government." The Shire of Three Springs recommends that the following advice notes be included with the determination: "(h) In relation to conditions 5 & 6 the Construction Management Plan shall address the following associated with the construction of the	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		laydown/clean down area for inspection to ensure it enters or leaves the solar farm/BESS site in a clean condition. <u>Surface Water and Wind Erosion Management Plans</u> DPIRD recommends that the proponent prepare management plans for both surface water and wind erosion, incorporating appropriate design methods to manage erosion risks associated with intense summer or winter weather events. The solar farm will be located on the Nebru 7 and Winchester 3 soil-landscape subsystem units. The Nebru 7 subsystem consists of yellow and pale deep sands, which carry a high to very high wind erosion risk. While the risk of soil erosion is high if the soil is bare, DPIRD expects this will be managed during the construction/decommissioning phases. The establishment of ground cover should manage this risk for the duration of the facility's operational life. DPIRD suggests that, to prevent wind erosion, pastures should be managed to maintain a minimum of 50% ground cover, with a target of 70%. <u>Decommissioning Plan</u> DPIRD recommends approval is conditional on the preparation of a decommissioning plan. This will ensure the facility is planned and constructed in a manner that enables the site to be returned to agricultural production without residual contamination. DPIRD expects the lifespan of the proposed facility to be up to 30 years and anticipates that the facility may be renewed at that time to extend its operational life. Eventually the facility will be decommissioned, the	development or any other matters considered relevant by the local government:... ...xiii) biosecurity protocols.” “(m) The applicant is responsible to ensure that biosecurity protocols are maintained for the site to minimise biosecurity risks for the landowner, adjoining farms and along the transport route and should further information be required on appropriate practices the applicant should contact the Department of Primary Industries & Regional Development in this regard.” The Shire of Three Springs recommends that the following conditions be included with the determination: “7. Prior to commencement of the development a Stormwater Management Plan shall be submitted to the local government for approval on advice of the Department of Water & Environmental Regulation. 8. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Stormwater Management Plan to the satisfaction of the local government.” <u>Decommissioning</u> “Once detailed engineering has been completed, a detailed Decommissioning Plan will be prepared. The plan will outline how each component of the development will be removed, transported and managed for recycling, reuse or appropriate disposal. The Decommissioning Plan will also address the rehabilitation of areas disturbed by development and infrastructure, to support the future use of the land for agricultural purposes and/or other appropriate land uses.”	

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

Submission & Date Received	Respondent	Summary of Submission	Comment	Shire Recommendation
		infrastructure removed and the land returned to farming purposes.	The Shire of Three Springs recommends that the following conditions be included with the determination: “23. Prior to commencement of operations a Preliminary Decommissioning Plan shall be submitted to the local government for approval. 24. The applicant is required to give at least 12 months’ notice to the local government if the proposed development is to cease operations and all infrastructure must be decommissioned and removed from the site. The site must be demonstrated to be free of contaminants and the site rehabilitated through deep ripping/earthworks, and other measures as included in the approved Final Decommissioning Plan to the satisfaction of the local government, within 2 years of giving this notice, unless the local government agrees otherwise.”	
10 (28/5/26)	Department of Fire & Emergency Services (DFES)	Recommendation: Insufficient information provided – further information and review required. DFES notes that the current version of State Planning Policy 3.7 Bushfire (SPP 3.7) and the Planning for Bushfire Guidelines (Guidelines) no longer makes reference to ‘high risk land use.’ The decision maker has referred this proposal to DFES as a discretionary referral. DFES considers that SPP3.7 and the Guidelines do not adequately address high risk land use such as renewable energy facilities from a Hazard Management Agency perspective. Given the temperature sensitive nature of the infrastructure, it is critical to ensure that the proposed design adequately responds to facility fire risks and bushfire risks in order to protect life, property and infrastructure. Accordingly, DFES has also assessed the proposal against the CFA Design Guidelines and Model Requirements – Renewable Energy Facilities as amended (REF Guidelines) which is currently considered best practice for the development of renewable energy facilities.	Copy of the DFES submission was provided to the applicant inviting comment. The received correspondence from Western Environmental on behalf of the applicant has been included immediately following the DFES submission within ‘Attachment 2 – Copy of Submissions’ to the DAP Agenda Report. The applicant’s response makes comment in relation to the issues raised in the Table as contained in the DFES submission relating to vegetation assessment and methodology/calculation; storage of hazardous materials; vehicle accessways/access points; water supply and cooling/water system. The applicant’s response notes the following (amongst other comments): <i>“It should be reiterated that the Country Fire Authority (CFA) Design Guidelines and Model Requirements for Renewable Energy Facilities Version 4 (REF Guidelines) are a best practice guide and have no statutory effective in Western Australia. The BMP seeks to strike a balance by adopting certain requirements from the REF Guidelines to manage bushfire risk to an acceptable level. Based on the information currently available, it is not possible to undertake a complete assessment against the REF Guidelines. The BMP acknowledges that there are certain details are not currently available at the development application stage and includes a requirement for the BMP to be updated prior to</i>	Note submission and include conditions and advice note as outlined in comment section.

**Schedule of Submissions – Proposed Renewable Energy Facility (Solar Farm & Battery Energy Storage System)
3024 (Lot 201) Perenjori-Three Springs Road & 17112 (Lot 25) Midlands Rd, Womarden**

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		DFES notes that the BMP is limited in detail as to the specifics of the BESS system, and the specific components provided as part of the overall development. This has limited DFES' ability to provide detailed feedback at this stage of development. Further, the BMP has not assessed large portions of the development (including the BESS) against the REF Guidelines. As such, there are large portions of the proposal that have not been addressed in the submitted documentation, leaving DFES unable to provide a complete assessment/response at this stage. Specific requirements of SPP 3.7 and the supporting Guidelines and the REF Guidelines are to be further addressed in the BMP as outlined in the below assessment. The assessment comments relating to the REF Guidelines have been incorporated into the below overall assessment comments for the respective issue/element. DFES has reviewed the BMP, however cannot guarantee that the BMP is consistent with all other plans and information submitted as part of the proposal. The decision maker should be satisfied that all submitted documents have consistent details. DFES will provide any additional operational advice once received, noting that some operational areas were unable to response within the requested timeframe. DFES advises that the proposed development has the potential to increase the bushfire risk to people, property and infrastructure, and the BMP should provide sufficient information to address the bushfire protection criteria and ensure the bushfire risk is at an acceptable level and appropriate to the land use and location.	<i>building permit to ensure the detailed design complies with the management measures outlined in Table 6.”</i> <i>“DFES fail to acknowledge that the majority of the proposed development, including the BESS, is not proposed within a designated bushfire prone. Assessment of the proposed development has been guided by the Map of Bush Fire Prone Areas, with only bushfire prone assets and infrastructure being assessed under the BMP. WEPL have prepared several BMPs for renewable energy projects which have applied the same approach, all of which have been approved by the Regional Development Assessment Panel (DAP). More recently, this includes the Binningup Solar Farm and the Kojonup Wind Farm.”</i> <i>“WEPL confirms the site assessment has been undertaken by an experienced Level 3 accredited bushfire practitioner and that the vegetation has been classified in accordance with AS 3959:2018. The effective slope across the assessment area has also been assessed on site in accordance with AS 3959:2018 using a rangefinder. The post development vegetation assessment has excluded the subject site given the grassland will need to be managed to a low threat state by the proponent to maintain access for maintenance and prevent damage. The proponent's maintenance regime will be outlined in the Risk Management Plan which is required to be prepared prior to the commencement of operations, as a requirement of the BMP.”</i> <i>“WEPL acknowledges the DFES comment and confirms that a EMP will be prepared prior to the commencement of operations.” (EMP being an Emergency Management Plan)</i> <i>“As outlined above, the BMP acknowledges that certain details are not currently available to enable a complete assessment of the development against the REF Guidelines. Table 6 of the BMP includes bushfire management measures that will need to be considered as part of the detailed design stage, taking guidance from the REF Guidelines. In addition, Table 6 includes a requirement for the BMP to be updated to ensure the bushfire management measures are adopted in the detailed</i>	

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		DFES recommends the BMP be modified as per the Assessment advice provided in Tables 1-3 to contain all the information to address the requirements of SPP 3.7 and the Guidelines to enable a full assessment of the bushfire risk to inform decision making. The required information is listed in the Tables below. Should the modified BMP affect the design of the proposal, the proposal should be amended to reflect these modifications. - Table 1: Assessment – Policy Measure 7.1 ii. c. Compliant Preparation of a Bushfire Attack Level (BAL) Contour Map; - Table 2: Policy Measure 7.1 ii. e. Compliance with the Bushfire Protection Criteria 7: Development – Commercial and Industrial; - Table 3: Policy Measure 7.1 iv. and Section 9.4.2 of the Guidelines: DFES Role as Hazard Management Agency. <i>Shire of Three Springs Note: DFES submission provides an assessment table listing required modifications relating to vegetation assessment and methodology/calculation; storage of hazardous materials; vehicle accessways/access points; water supply and cooling/water system. DFES submission table also recommends preparation of a Risk Management Plan and Emergency Management Plan. These tables can be viewed within the DFES submission provided as 'Attachment 2 – Copy of Submissions' to the DAP Agenda Report.</i>	<i>design. Appendix E (CFA Guidelines Assessment) of the BMP will also be updated as further details become available. No BMP modifications are required at this stage of the project."</i> <i>"WEPL acknowledges the DFES comment and confirms that a RMP will be prepared prior to the submission of the building permit. The RMP will take guidance from the REF Guidelines, as per the DFES comment."</i> (RMP being a Risk Management Plan) The Shire of Three Springs recommends that the following conditions be included with the determination: "9. Prior to commencement of the development an updated Bushfire Management Plan, and a Risk Management Plan and Emergency Management Plan shall be submitted to the local government for approval on advice of the Department of Fire and Emergency Services. 10. Prior to the commencement of the use the landowner/applicant shall implement and thereafter maintain for the lifetime of the development the recommendations of the approved Bushfire Management Plan, Risk Management Plan and Emergency Management Plan to the satisfaction of the local government." The Shire of Three Springs recommends that the following advice note be included with the determination: "(k) In relation to conditions 9 & 10 the Bushfire Management Plan shall address the issues raised by the Department of Fire & Emergency Services and any other matters considered relevant by the local government."	
11 (1/6/26)	Water Corporation	Water Corporation has no objection to the proposal. The proposal does not appear to have a need for service provision from the Water Corporation, however, should services be required please reach out to the Water Corporation for our advice and assistance.	Copy of Water Corporation submission was provided to the applicant who advised as follows in relation to this submission: <i>"Noted."</i>	Note submission