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NEOEN

NARROGIN WIND FARM

Development Application

FINAL

March 2025

NARROGIN WIND FARM

Development Application

FINAL

Prepared by
Umwelt (Australia) Pty Limited
on behalf of
Neoen Australia Pty Ltd

Project Director:	Rob Karelse
Project Manager:	Cormac Collins
Technical Director:	Mark Herod
Report No.	22847/R11
Date:	March 2025

This report was prepared using Umwelt's ISO 9001 certified Quality Management System.

Acknowledgement of Country

Umwelt would like to acknowledge the traditional custodians of the country on which we work and pay respect to their cultural heritage, beliefs, and continuing relationship with the land. We pay our respect to the Elders – past, present, and future.

Document Status

Rev No.	Reviewer		Approved for Issue	
	Name	Date	Name	Date
V1	Cormac Collins	21/11/2024	Rob Karelse	21/11/2024
V2	Cormac Collins	19/03/2025	Rob Karelse	19/03/2025

Abbreviations

Abbreviation	Definition
AGL	Above Ground Level
AHD	Australian Height Datum
BAM Act	*Biosecurity and Agriculture Management Act 2007* (WA)
BBAMP	Bird and Bat Adaptive Management Plan
BBUS	Bird and Bat Utilisation Survey
BC Act	*Biodiversity Conservation Act 2016* (WA)
BESS	Battery Energy Storage System
CEMP	Construction Environmental Management Plan
CSEP	Community and Stakeholder Engagement Plan
DBCA	Department of Biodiversity, Conservation and Attractions
DCCEEW	Department of Climate Change, Energy, the Environment and Water
DPLH	Department of Planning, Lands and Heritage
DWER	Department of Water and Environment Regulation
LPP1	Shire of Williams Local Planning Policy No. 1 – Wind Farms
LPP D11	Shire of Narrogin Local Planning Policy D11 – Wind Farm/Turbines
EP Act	*Environmental Protection Act 1986* (WA)
EPA	Environmental Protection Authority
EPBC Act	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
NLPS	Shire of Narrogin Local Planning Scheme No. 3
MNES	Matters of National Environmental Significance
MWh	Megawatt hour
MW	Megawatt
O&M	Operations and Maintenance
PD Act	*Planning and Development Act 2005* (WA)
Position Statement	Position Statement: Renewable energy facilities (WAPC, 2020)
RSA	Rotor Swept Area
SPP1	State Planning Policy No. 1: State Planning Framework
SPP2	State Planning Policy No. 2: Environment and Natural Resources Policy
SPP2.5	State Planning Policy No. 2.5: Rural Planning
SPP2.9	State Planning Policy No. 2.9: Water Resources
SPP3.7	State Planning Policy No. 3.7: Planning in Bushfire Prone Areas
SWIS	Southwest Interconnected System
WAPC	Western Australian Planning Commission
WTPS	Shire of Williams Town Planning Scheme No. 2

Executive Summary

The Narrogin Wind Farm project (the Project) will involve the construction and operation of up to 25 wind turbines with a production capacity of up to 200 MW, a Battery Energy Storage System (BESS) with a capacity of 100 MW/200 MWh, and associated infrastructure. The Project Site covers an area of 6,344 ha and is located approximately 7 km east of Williams, 9 km west of Narrogin, and 160 km southeast of Perth, WA. The Project Site is predominantly cleared land used for agriculture and livestock grazing, with patches of remnant and regrowth woodland.

The Project is of State and regional importance and will facilitate social and economic benefits for the broader community and the State of Western Australia. Pending required approvals, the Project can be developed in time to support State government decarbonisation targets. A key advantage of this Project is that it can connect to the existing South-West Interconnected System (SWIS) within the Project Site without significant transmission infrastructure. It has been awarded critical project status with Western Power to enable a timely connection. Furthermore, on 24 December 2024, the EPA determined that the Project is not required to be assessed under Part IV of the *Environmental Protection Act 1986.*

The Project will provide economic benefits to the local community, including the creation of up to 250 jobs during the 33-month construction period and 10–15 permanent jobs during the operational period. A Community Benefit Fund will be established, providing an annual contribution of $225,000 to community grants. Neoen has also committed to establishing a Neighbour Benefit Sharing Scheme is in addition to the Community Benefit Fund, which ensures near neighbours can directly benefit from the regions' energy transition.

The Project is well aligned with the *State Planning Strategy for 2050* (Western Australian Planning Commission (WAPC), 2021) by increasing generation of renewable energy and providing jobs to support the economy of regional areas, the *Energy Transformation Strategy* (Energy Policy WA, 2021) by providing a secure and reliable electricity supply and reducing energy sector emissions, and the *WA Climate Policy* (Department of Water and Environmental Regulation (DWER), 2020) by transforming energy generation and supporting resilient regions.

The Project has considered and addressed the policy position of the Western Australian Planning Commission (WAPC) as described in the *Renewable Energy Position Statement* (Western Australian Planning Commission (WAPC), 2020) and other relevant State Planning Policies. The Proponent has engaged with key stakeholders, including local government, community members, traditional owners, local special interest groups and businesses, and State and Commonwealth regulatory agencies. Comprehensive assessments have been completed to understand potential impacts related to flora, fauna, hydrology, noise, landscape and visual landscape, Aboriginal and historic heritage, bushfire, and other factors. Outcomes from these engagements and assessments have informed the Project design to mitigate impacts, including by reducing the size of the Project Site and removing and relocating turbines. The Project is supported by a preliminary Construction Environmental Management Plan, Preliminary Decommissioning Plan, and Preliminary Bird and Bat Adaptive Management Plan to demonstrate commitment to ongoing management and mitigation of potential project impacts. These measures collectively demonstrate a proactive approach to managing and mitigating potential impacts throughout the Project's lifecycle.

The Proponent is seeking discretion from the WAPC to consider the project in the public interest under Clause 171R of the *Planning and Development Act 2005*. Discretion is sought for a minor variance of the Project with the Shire of Narrogin *Local Planning Policy D11 – Wind Farm/Turbines* and Shire of Williams *Local Planning Policy No. 1 – Wind Farms*, specifically in relation to setback requirements noting that the decision maker is required to give "due regard" to the Local Planning Policy, and potential development on neighbouring lots. **Section 6.4** of this application provides a comprehensive rationale that supports a determination 'in the public interest'.

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1.0 Introduction

This Planning Report supports an application for Development Approval under Part 11B of the *Planning and Development Act 2005* for the Narrogin Wind Farm (the Project).

The Project is of State importance and in the public interest as a well-advanced green energy generation project that can be developed in time to support State government decarbonisation targets. It has sufficient land for a feasible project, in a location with good wind resource and the ability to connect to the South-West Interconnected System (SWIS) without significant additional transmission lines that may require government support and funding. Further to being of State importance, the Project provides benefits to the local community via diversification of income in a predominantly agriculture dominated region and direct contributions to a Community Benefit Fund over the life of the Project. The Proponent has also committed to establishing a Neighbour Benefit Sharing Scheme, this is in addition to the Community Benefit Fun and ensures near-neighbours can directly benefit from the regions' energy transition.

Critical outcomes of developing a wind farm in this locality are to support greater energy security, environmental sustainability and the utilisation of the Wheatbelt's renewable energy resources. There is significant potential for the Project to support WA's clean energy transition to both create a diversified grid and achieve net zero by 2050.

In summary, this report addresses the Shire of Narrogin Local Planning Scheme No. 3 (LPS No. 3), the Shire of Williams Town Planning Scheme No. 2 (TPS No. 2) and other relevant components of the State Planning Framework. It also describes how planning advice provided by the Significant Development Assessment Unit (SDAU) via the Part 11B pre-lodgement process has been considered. A summary of Stakeholder and Community Engagement and the technical studies that have been completed to support the Project is also provided.

This application and supporting documents are submitted on behalf of Neoen Australia Pty Limited (Neoen).

1.1 The Proponent

Founded in 2008, Neoen is one of the world's leading independent producers of exclusively renewable energy. With expertise in solar power, wind power and storage, the company plays an active role in the energy transition by producing competitive, green, local energy on four continents.

Neoen Australia began in Sydney in 2012. Since then, the Australian branch has grown rapidly and represents Neoen's largest portfolio outside Europe and a major strategic priority. Neoen's local team has grown to more than 100 employees across Sydney, Canberra, Brisbane, Adelaide, Hobart and Perth working in development, energy management, finance, construction, and operations.

As of September 2024, Neoen has 21 assets and over 4.36 GW of renewable assets in operation or under construction in Australia, representing over $4 billion Australian dollars in investment. The company has a target to increase this to more than 10 GW by 2030.

Neoen has operational wind farms around the world including four in Australia:

- 316 MW Hornsdale Wind Farm, SA (2016)
- 194 MW Bulgana Green Power Hub, VIC (2019)
- 157 MW Kabana Green Power Hub, QLD (2021)
- 412 MW Goyder South Wind Farm, SA (2022).

In WA, Neoen received development approval for a 1 GW Battery Energy Storage System (BESS) in the Shire of Collie. Stage 1 (219 MW/877 MWh) of the Collie BESS is now operational and Stage 2 (341 MW/1,363 MWh) is under construction and due to be operational in Q4 2025. Neoen has also received development approval for the construction of a 200 MW BESS in the Shire of Chittering, and has a number of other wind projects in WA that are in early development stages. Neoen's projects including Narrogin Wind Farm have been ranked highly as part of Western Power's Critical Project Framework process, which assesses the maturity and quality of the proposed development as well as the Proponents ability to successfully develop the project.

Neoen's business model is to develop, build, own and operate its projects. This strategy allows us to guarantee the long-term quality and performance of our assets. We also see ourselves as long-term neighbours and are committed to sharing the benefits with surrounding communities.

1.2 Project Overview

Neoen is seeking approval to develop the Project approximately 7 km east of the township of Williams, 9 km west of the township of Narrogin, and 160 km south-east of Perth, Western Australia (WA) (**Figure 1.1**). The Project will involve the construction of up to 25 wind turbines (turbines) with a production capacity up to 200 MW, a BESS with a capacity of 100 MW/ 200 MWh, and associated infrastructure. It will be developed across freehold properties and road reserves, covering an area of 6,344 ha referred to as the Project Site.

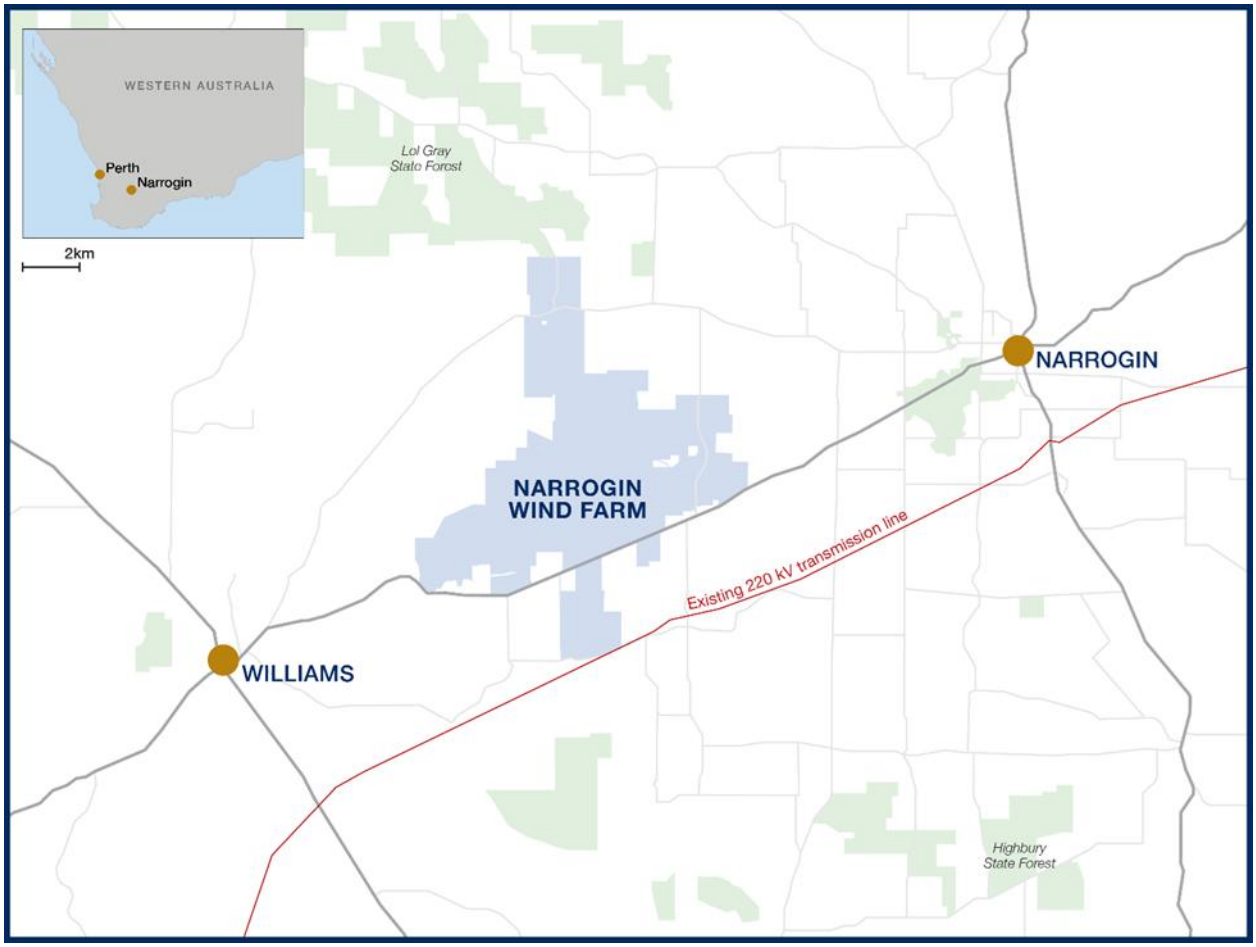


Figure 1.1 Project Location

The Project location was selected for development because it has a strong wind resource, is predominantly cleared of native vegetation, has an existing high voltage transmission line located at the southern boundary of the Project Site, has a relatively low population density, whilst also has access to established transportation corridors and water supply.

The Project will be compatible with existing cropping and grazing land uses, offering a diverse and consistent form of revenue to involved landholders. The Project will assist in the clean energy transition and decarbonisation of energy networks in Western Australia which have been identified as key goals for the Western Australian government.

The Project will connect into an existing 220 kV transmission line owned and operated by Western Power that intersects the southern boundary of the Project Site and forms part of the SWIS.

For the purposes of this report, the **Project Site** refers to the boundaries of all involved land parcels where consent has been granted for development of the Project and wherein all Project infrastructure will be contained. The Project Site is 6,344 ha and corresponds to the Study Area referenced in supporting reports.

The **Indicative Project Layout** refers to the maximum area of land that will be cleared for installation of all Project infrastructure within the Project Site. It is based on a "worst case" largest possible layout and has been used to calculate the maximum area of native vegetation clearing (7.41 ha of remnant native vegetation and 0.98 ha of planted native vegetation) and as part of noise and visual assessments. This layout is indicative and will be confirmed as part of the detailed design stage and it is expected that there may be some micro siting of turbines. Impact assessments within this document are based on the entire Indicative Project Layout which is approximately 192 ha.

The Indicative Project Layout is illustrated on **Figure 1.2**. Detailed indicative drawings are provided in **Appendix Q**.

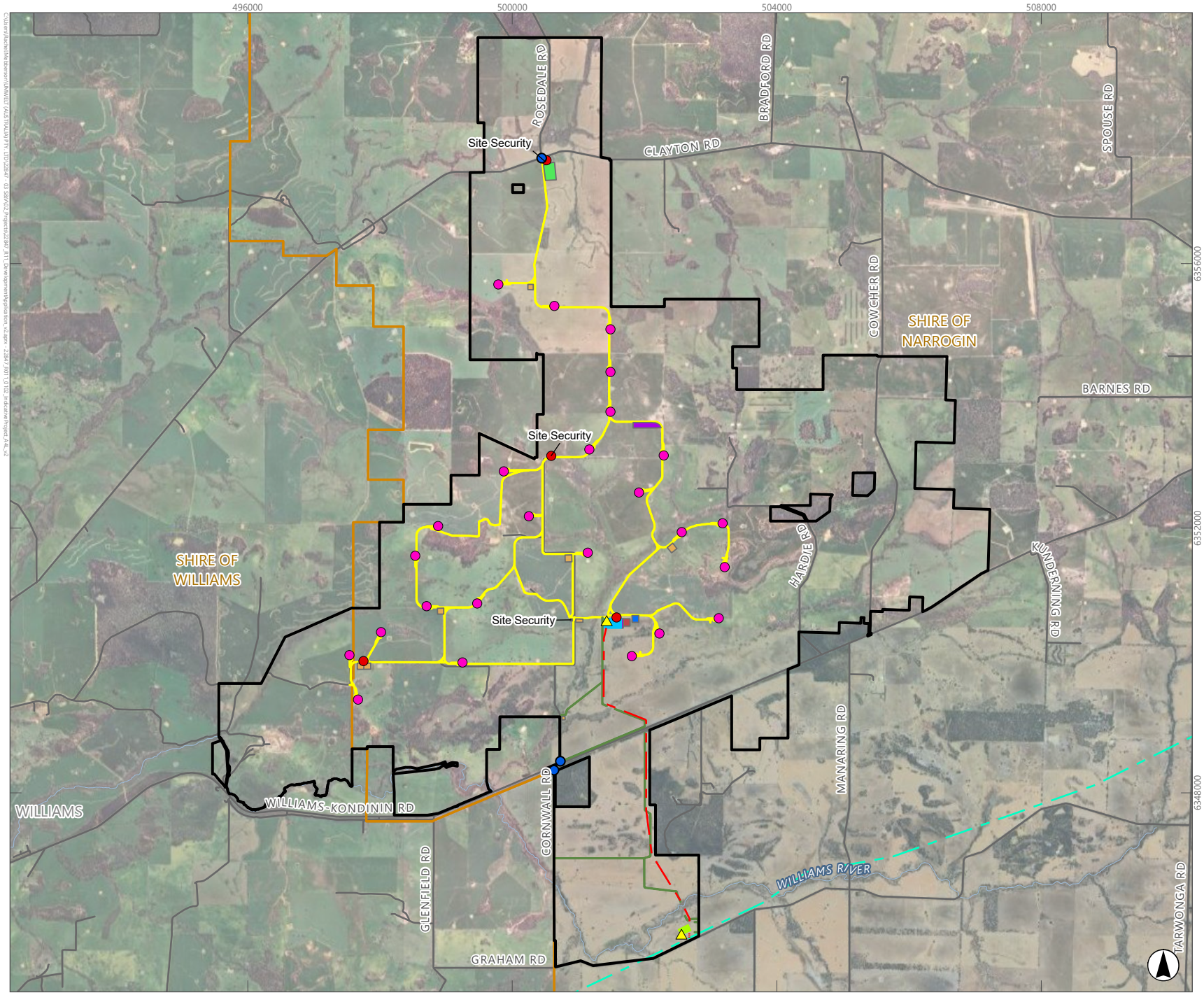


FIGURE 1.2
Project Site and Indicative Layout

Legend

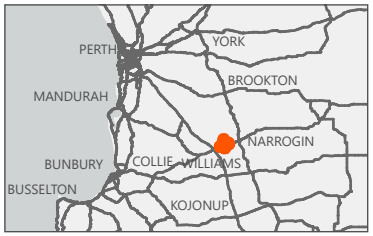
- Project Site
- Local Government Area Boundary
- Road
- Existing 220kV Transmission Line
- Major Watercourse

Indicative Project Layout

- Turbine
- Firewater Tank
- Site Entry
- Communications Tower
- BESS, Substation and O&M Compound
- Western Power Terminal
- Overhead Transmission Connection
- Internal Roads and Underground Cabling (Permanent)

Temporary Infrastructure

- Site Security
- Accommodation Camp
- Laydown Areas
- Batching Plant
- Contractors Construction Compound
- Turkey Nest Dam
- Internal Roads (Temporary)



0 1.6 3.2

Kilometres

Scale 1:80,000 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), DBCA (2023), WP (2023)

1.3 Project Benefits

1.3.1 Local Community Benefits

As the long-term owner and operator of all their renewable energy assets, Neoen is committed to maximising the long term economic and employment opportunities and benefits for the local community associated with the Project.

Neoen's 'develop to own' business model is rare in the renewables industry, affording a clear advantage over competitors with respect to local communities and businesses. Neoen's starting point is the clear understanding that they will be neighbours and participants in the community for the lifetime of the Project.

As such Neoen seeks to develop and nurture local procurement initiatives, partnerships and innovation with the confidence that they will be there to see projects through from early development to the final stages of operations in many years to come.

This Project is a significant investment in energy infrastructure in the Shires of Narrogin and Williams. It will contribute to the economy of the region at a time when agriculture is becoming more susceptible to the impacts of climate change.

Construction for the Project will provide direct economic benefits to the local community. It is expected that up to approximately 250 jobs will be generated during the 33-month construction period as well as between 10 and 15 jobs during the operational period. In consideration of providing economic benefits to the local community, Neoen will seek to, where possible:

- maximise local industry participation by providing local jobseekers and industry with full, fair and reasonable opportunity to participate
- prioritise employees from the local community, or accommodate employees in the nearby area where practicable
- undertake a local economic and supply market analysis and maintain a register to identify potential local suppliers
- provide early notice to the market of upcoming major procurement activity
- use the services of local content specialists and support their use by contractors and sub-contractors
- hold public briefings which will provide timely information to regional business and industry on the jobs, services, supplies and support requirements of the Project
- hold a Local Employment & Networking session in pre-construction period (and advertise this in local media) to provide timely and equitable access to supply opportunities
- encourage sub-contractors to maximise the use of local business when contracts are awarded outside the region
- identify opportunities for local industry support and innovation

- identify opportunities to support training, upskilling and apprenticeships
- identify training opportunities and support for subcontractors on the preparation of bids.

Figure 1.3 Local Employment Opportunities

1.3.2 Community Benefit Fund

A Community Benefit Fund will be established for the Project and will provide an annual contribution of $225,000 to community grants, which will commence at the start of the Project's operations and will run annually for the Project's lifetime. The fund will be administered as a non-profit foundation and the decision-making will be undertaken by an Advisory Committee consisting of representatives from the local Shires, the local community and Neoen. Local community organisations will be able to apply for this fund for local community-building, environmental, and education projects. The fund is not intended for individuals, businesses or local government projects. Neoen has already started engaging with the community to understand the priorities of local residents with regards to a Community Benefit Fund.

Furthermore, the Project will deliver a Neighbour Benefit Scheme (NBS), going 'above and beyond' the state government's planning requirements for large-scale renewable energy projects in WA. The NBS will ensure near-neighbours can directly benefit from the region's energy transition.

1.3.3 State Benefits

The *Climate Change Act 2022* set Australia's greenhouse gas emissions reduction targets of a 43% reduction from 2005 levels by 2030 and net zero by 2050. In Western Australia, the Government has committed to a whole-of-government 2030 greenhouse gas emissions reduction target of 80 per cent below 2020 levels.

This Project contributes to achieving key goals and objectives outlined by the State government in their Energy Transformation Strategy, by helping to maintain a secure and reliable energy supply, ensure affordable energy, and reduce emissions through increasing renewable energy supply at a local and regional level (Energy Policy WA, 2021).

The Project will directly contribute to WA's clean energy transition and support future increases in electricity demand that are forecasted. A demand assessment undertaken for the SWIS found from initial modelling that the level of electricity required by 2042 could grow to five times that of 2022. This would necessitate almost ten times the amount of current generation capacity in the SWIS if electricity is to be generated primarily from renewable sources (Department of Energy, Mines, Industry Regulations and Safety (DEMIRS), 2024).

The Project will support the regional development and diversification of the Narrogin and Williams areas. Once operational, the plant will produce enough energy to power over 100,000 households displacing 346,000 tonnes of CO_2 annually.

The alignment of the Project with key State strategies and policies is described in **Section 6.1**.

2.0 Site Context

2.1 Regional and Local Context

2.1.1 Social

The Project is located predominantly in the Shire of Narrogin, with the remainder of the project within the Shire of Williams. Narrogin and Williams sit within the South-Central subregion of the Wheatbelt.

The Shire of Narrogin covers an area of approximately 1,630 km^2 and has a population of 4,779 (Australian Bureau of Statistics (ABS), 2021). The Shire has a mix of agricultural land, crown land and town sites. Narrogin is a regional centre, providing a range of services and infrastructure to the Narrogin community, as well as for residents from surrounding localities.

The Shire of Williams, located directly west of Narrogin, has a smaller population of 1,021 (ABS, 2021). The Local Government Area (LGA) covers a land area of approximately 2,300 km^2, which is predominately used for agricultural purposes, producing wool, wheat, oats and beef.

The region in and around the Project Site is sparsely populated and many of the surrounding properties are large landholdings that are made up of many lots. This allows for the design of the Project to meet the relevant noise limits at existing non-involved sensitive receivers.

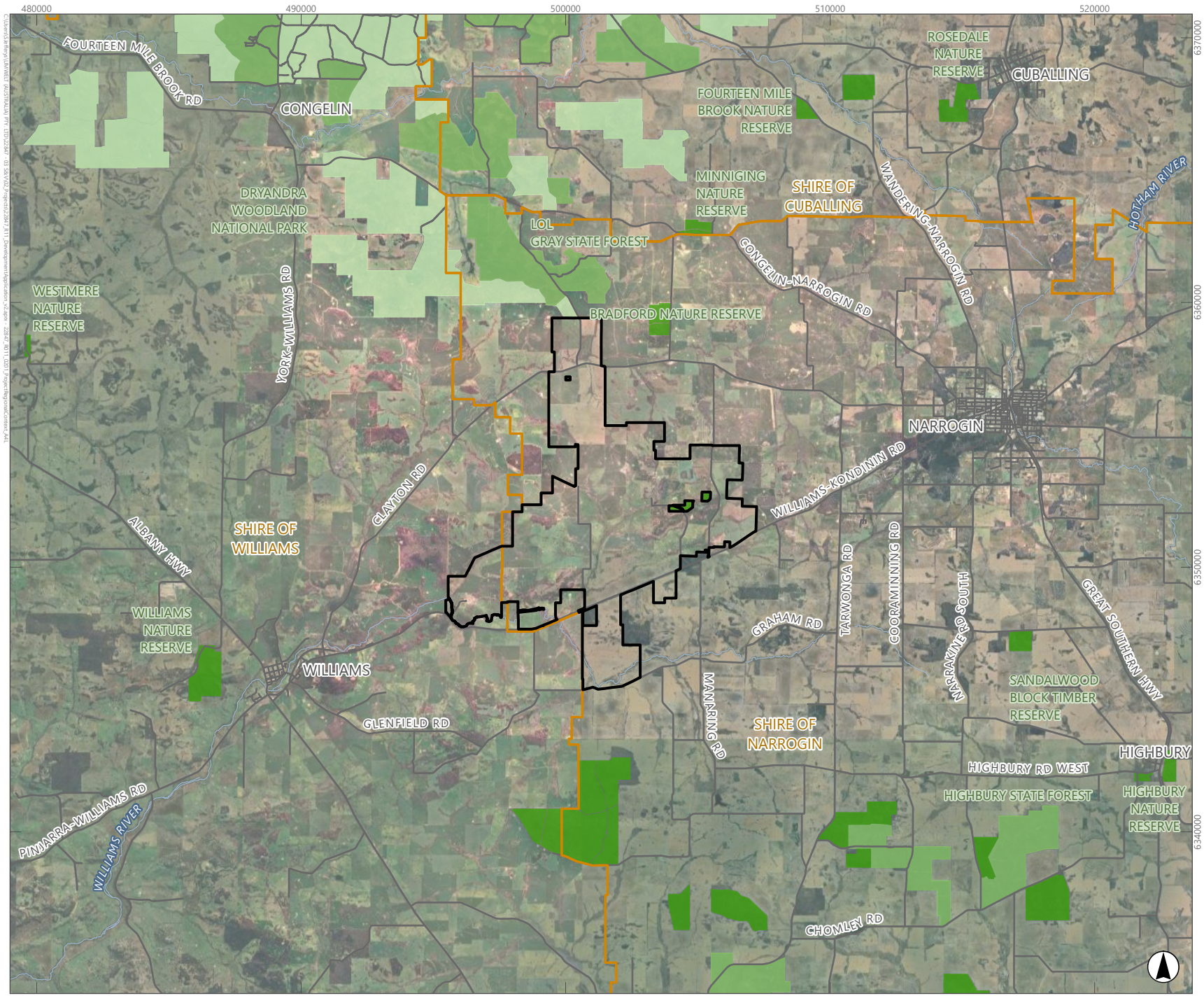
2.1.2 Environmental

The Project Site predominantly consists of land cleared for agriculture and livestock grazing, with interspersed patches of remnant and regrowth woodland that is generally associated with hills and slopes. Key environmental features in proximity to the Project Site include:

- Dryandra Woodland National Park, located directly adjacent to the northern boundary of the Project Site and 3.5 km from the nearest turbine.
- Lol Gray State Forest, located 500 m north of the Project Site and 4.3 km from the nearest turbine, which forms a mosaic of protected areas along with Dryandra Woodland National Park.
- Bradford Nature Reserve, located 2 km east of the northern boundary of the Project Site.
- Three unnamed Nature Reserves which are surrounded by land parcels associated with the Project Site.
- An unnamed Nature Reserve for the purposes of conservation of flora and fauna, located approximately 2 km south of the Project Site.
- Numerous other Nature Reserves and State Forests located to the south of the Project Site within a 20 km buffer.

Figure 2.1 provides an overview of the surrounding social and environmental context of the Project Site.

FIGURE 2.1
Project Regional Context



Legend

- Project Site
- Local Government Area Boundary
- Road
- Major Watercourse
- Nature Reserve
- National Park
- State Forest

0 4 8

Kilometres

Scale 1:200,000 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Umwelt (2023), DBCA (2023)

2.2 Project Site

2.2.1 Site Legal Description and Ownership

The lots intersecting the Project Site are primarily Freehold Land owned by private landholders, with some extents of public land comprised of road reserves managed by state and local government. For the purposes of this application, lots within the Project Site owned by private landholders are referred to as "involved" lots.

Further details on the lots located within the Project Site are presented in **Table 2.1.**

Table 2.1 Description of Lots within Project Site

Land Owner	CT	Volume	Folio	Lot	Plan
BESSELL HOLDINGS PTY LTD	1687/489	1687	489	3	P014814
CONRAC PTY LTD	16/98A	16	98A	10880	P085747
CONRAC PTY LTD	1057/398	1057	398	9046	P134966
CONRAC PTY LTD	LR3151/514	LR3151	514	300	P044273
CONRAC PTY LTD	16/98A	16	98A	1235	P104250
CONRAC PTY LTD	16/98A	16	98A	1380	P104812
CONRAC PTY LTD	16/98A	16	98A	1382	P104839
CONRAC PTY LTD	16/98A	16	98A	1402	P104838
CONRAC PTY LTD	16/98A	16	98A	3661	P113941
CONRAC PTY LTD	16/98A	16	98A	6394	P121780
CONRAC PTY LTD	16/98A	16	98A	8091	P132804
CONRAC PTY LTD	16/98A	16	98A	8694	P134015
CONRAC PTY LTD	16/98A	16	98A	9810	P083303
CONRAC PTY LTD	491/2A	491	2A	9322	P136440
CONRAC PTY LTD	491/2A	491	2A	14879	P166345
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1378	P105194
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1423	P105193
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1754	P106693
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1207	P104035
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1229	P104038
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1231	P104174
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	1233	P104176
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	2	D034397
FINDEISEN NOMINEES PTY LTD	189/19A	189	19A	168	P301930
FINDEISEN NOMINEES PTY LTD	LR3156/542	LR3156	542	302	P062345
STEVEN JOHN FORD	1724/878	1724	878	2	P014814
STEVEN JOHN FORD	1724/877	1724	877	4870	P115822
STEVEN JOHN FORD	2676/976	2676	976	807	P044274

Land Owner	CT	Volume	Folio	Lot	Plan
STEVEN JOHN FORD	2676/977	2676	977	808	P044274
STEVEN JOHN FORD	2676/978	2676	978	809	P044274
STEVEN JOHN FORD	1724/880	1724	880	6120	P121057
STEVEN JOHN FORD	1724/879	1724	879	6121	P121056
T.S. & D.E. COWCHER FARMS PTY LTD	1849/441	1849	441	1711	P106683
T.S. & D.E. COWCHER FARMS PTY LTD	1849/439	1849	439	1931	P107560
T.S. & D.E. COWCHER FARMS PTY LTD	1849/440	1849	440	3090	P113584
T.S. & D.E. COWCHER FARMS PTY LTD	1849/438	1849	438	3751	P121059
T.S. & D.E. COWCHER FARMS PTY LTD	1170/674	1170	674	4141	P113939
T.S. & D.E. COWCHER FARMS PTY LTD	1170/674	1170	674	4153	P113579
T.S. & D.E. COWCHER FARMS PTY LTD	2709/978	2709	978	831	P062345
T.S. & D.E. COWCHER FARMS PTY LTD	814/10	814	10	1066	P102908
T.S. & D.E. COWCHER FARMS PTY LTD	82/153A	82	153A	1067	P102909
T.S. & D.E. COWCHER FARMS PTY LTD	1306/153	1306	153	7617	P127803
T.S. & D.E. COWCHER FARMS PTY LTD	383/104A	383	104A	10019	P084084
T.S. & D.E. COWCHER FARMS PTY LTD	1112/540	1112	540	1341	P104837
T.S. & D.E. COWCHER FARMS PTY LTD	1112/539	1112	539	1357	P104836
T.S. & D.E. COWCHER FARMS PTY LTD	1849/437	1849	437	3391	P115818
T.S. & D.E. COWCHER FARMS PTY LTD	1849/437	1849	437	3392	P115819
T.S. & D.E. COWCHER FARMS PTY LTD	1849/436	1849	436	7237	P127805
T.S. & D.E. COWCHER FARMS PTY LTD	1849/436	1849	436	7299	P127804
T.S. & D.E. COWCHER FARMS PTY LTD	1849/436	1849	436	8931	P133000
T.S. & D.E. COWCHER FARMS PTY LTD	1179/29	1179	29	208	P115833
T.S. & D.E. COWCHER FARMS PTY LTD	1170/287	1170	287	7789	P128872
T.S. & D.E. COWCHER FARMS PTY LTD	1849/436	1849	436	8100	P129751
T.S. & D.E. COWCHER FARMS PTY LTD	1044/32	1044	32	941	P102169
T.S. & D.E. COWCHER FARMS PTY LTD	1112/539	1112	539	1250	P104156
T.S. & D.E. COWCHER FARMS PTY LTD	1112/539	1112	539	1251	P104157
T.S. & D.E. COWCHER FARMS PTY LTD	1112/540	1112	540	1422	P105192
T.S. & D.E. COWCHER FARMS PTY LTD	1112/540	1112	540	1817	P108254
T.S. & D.E. COWCHER FARMS PTY LTD	1112/539	1112	539	2484	P108492
THOMAS SPURLING COWCHER	1372/189	1372	189	15602	DP211964
THOMAS SPURLING COWCHER	914/109	914	109	4972	P115813
TIMOTHY JOHN COWCHER	1013/652	1013	652	7236	P128327
TIMOTHY JOHN COWCHER	1039/668	1039	668	9337	P136439
TIMOTHY JOHN COWCHER	1515/109	1515	109	1257	P104542
TIMOTHY JOHN COWCHER	1535/376	1535	376	1410	P106692
TIMOTHY JOHN COWCHER	1817/679	1817	679	4163	P113951

Land Owner	CT	Volume	Folio	Lot	Plan
TIMOTHY JOHN COWCHER	1126/793	1126	793	4243	P113946
TIMOTHY JOHN COWCHER	1042/554	1042	554	449	P101213
TIMOTHY JOHN COWCHER	16/97A	16	97A	500	P302890
TIMOTHY JOHN COWCHER	1515/111	1515	111	1098	P102899
TIMOTHY JOHN COWCHER	1535/375	1535	375	1197	P245629
TIMOTHY JOHN COWCHER	1013/634	1013	634	8836	P134965
TIMOTHY JOHN COWCHER	785/96	785	96	1373	P104834
TIMOTHY JOHN COWCHER	1535/372	1535	372	132	P125504
TIMOTHY JOHN COWCHER	1535/370	1535	370	194	P110687
TIMOTHY JOHN COWCHER	1535/371	1535	371	195	P110688
TIMOTHY JOHN COWCHER	1282/124	1282	124	203	P245788
TIMOTHY JOHN COWCHER	1525/151	1525	151	240	P181509
TIMOTHY JOHN COWCHER	2709/977	2709	977	834	P062344
TIMOTHY JOHN COWCHER	1282/125	1282	125	942	P102168
TIMOTHY JOHN COWCHER	1515/111	1515	111	1258	P104543
TIMOTHY JOHN COWCHER	1515/112	1515	112	1259	P104541
TIMOTHY JOHN COWCHER	1515/111	1515	111	1260	P104540
TIMOTHY JOHN COWCHER	758/53	758	53	1372	P104835
TIMOTHY JOHN COWCHER	1515/111	1515	111	1374	P104813
TIMOTHY JOHN COWCHER	1817/679	1817	679	2711	P113949
TIMOTHY JOHN COWCHER	1817/679	1817	679	4149	P113945
TIMOTHY JOHN COWCHER	1426/232	1426	232	15603	DP211964
TIMOTHY JOHN COWCHER	1535/373	1535	373	492	P257440
TIMOTHY JOHN COWCHER	2709/977	2709	977	832	P062344
TIMOTHY JOHN COWCHER	2709/977	2709	977	833	P062344
TIMOTHY JOHN COWCHER	1515/111	1515	111	1063	P102900
TIMOTHY JOHN COWCHER	1515/111	1515	111	1099	P102901
TIMOTHY JOHN COWCHER	1515/110	1515	110	6276	P121773
TIMOTHY JOHN COWCHER	16/97A	16	97A	7201	P128326
TIMOTHY JOHN COWCHER	1052/792	1052	792	8822	P134014
TIMOTHY JOHN COWCHER	936/123	936	123	8908	P134013
TIMOTHY JOHN COWCHER	1160/194	1160	194	11343	P085136
TIMOTHY JOHN COWCHER	1126/793	1126	793	13047	P113945
TIMOTHY JOHN COWCHER / T.S. & D.E. COWCHER FARMS PTY LTD (TENANTS IN COMMON IN EQUAL SHARES)	1282/126	1282	126	130	P085839
TIMOTHY JOHN COWCHER / T.S. & D.E. COWCHER FARMS PTY LTD (TENANTS IN COMMON IN EQUAL SHARES)	905/166	905	166	150	DP233217

2.2.2 Site Selection

The Project Site was selected for development for the following key reasons:

- The presence of a Western Power 220 kV transmission line in the south of the Project Site providing suitable network access with sufficient capacity to accommodate the Project and minimal additional infrastructure required such as long-distance transmission corridors and lines. The cost of minimal amount of infrastructure required can therefore be borne by the proponent and does not rely on government funding to be able to connect.
- The Project Site contains 5,098.9 ha (80.4%) of cleared land which provides options for the siting of Project infrastructure in areas that minimise the clearing and disturbance of native vegetation.
- The Project Site provides good access to existing road networks, including major roads and highways allowing Project infrastructure, plant and equipment to be transported to site without significant upgrades outside of the existing road network.
- The Project Site is primarily used for agricultural activities such as cropping which can be continued without significant loss of suitable land to Project infrastructure due to its relatively minor footprint, making both land uses compatible and maximising use of existing disturbed areas for economic activities.
- There is a sufficiently large area of land to host a financially viable wind farm in an area with relatively low density of dwellings, allowing for adequate setbacks between turbines and existing neighbouring dwellings to meet noise compliance criteria.
- The availability of a good wind resource that is diversified from those used by established wind farms in the State (i.e. peak wind production at different times of the day) which also reduces the need for energy storage to smooth transitions between energy sources.
- Availability of water for construction from the WA Water Corporation pipeline that runs through the Project Site, avoiding the need to abstract significant quantities of water from a water scarce area.
- Topology and geology of the site, means that the amount of fill material to be imported and cut material to be exported is minimal. There is sand and aggregate material on site and nearby reducing the vehicle movements required to deliver the construction material to site and associated carbon emissions.

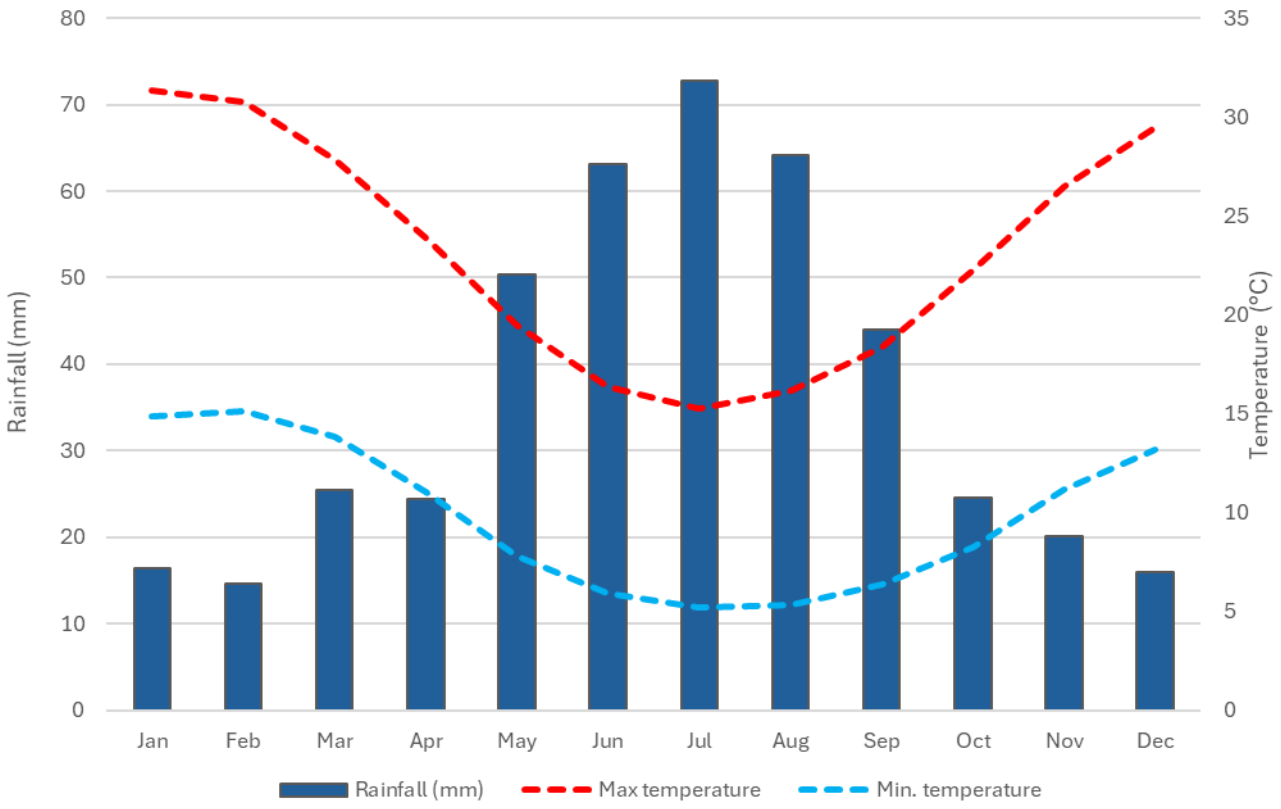
2.2.3 Site History and Land Use

Over 80% of the Project Site has been historically cleared for agricultural purposes, and agriculture (primarily sheep and cropping) continues to be the primary land use within the Project Site. Uncleared areas comprise of interspersed patches of remnant and regrowth woodland that is generally associated with hills, slopes, and creeklines. Further details on flora, vegetation and hydrology features within the Project Site are presented in **Section 7.1**.

There is also an agricultural feed factory and a number of houses and sheds owned by involved landholders located within the Project Site.

2.2.4 Climate

Climate data was gathered from the Narrogin Station (010614), which is approximately 1.1 km southwest of Narrogin, and therefore the closest weather station to the Project Site. Monthly averages for rainfall, minimum and maximum temperatures were obtained from 1993 to 2023 (representing a full 30-year climate cycle) and can be seen in **Graph 2.1**. The average temperature ranges from 31.4°C in January to 5.2°C in July (Bureau of Meteorology (BOM), 2024b). The average amount of rain received over the course of a single year in Narrogin is 435.9 mm(BOM, 2024a).



Graph 2.1 Narrogin Climate Statistics (BOM, 2024a, BOM, 2024b)

2.2.5 Topography

The topography of the Project Site is largely defined by undulating rises and low hills with elevations between approximately 274 m and 386 m Australian Height Datum (AHD) being divided by a series of gently inclined plains associated with waterways.

3.0 Project Overview

3.1 Project Summary

The Project will involve the construction of up to 25 wind turbines with a production capacity up to 200 MW, a BESS with a capacity of 100 MW/ 200 MWh and associated infrastructure.

The distance between the easternmost and westernmost turbines is approximately 6.5 km, while the distance between the northernmost to southernmost turbines is approximately 7 km. The distance between individual turbines is between 540 m and 1,050 m.

The BESS will be located towards the centre of the Project Site adjacent to the substation and operational and maintenance facilities. From this location, overhead transmission lines will extend south over Narrogin-Williams Highway to the Western Power terminal to be located in the southernmost point of the Project Site where the Project will tie into existing 220 kV transmission infrastructure. All other electrical infrastructure within the Project Site will be underground.

Access tracks will provide access between turbine locations, with heavy vehicle site access provided off Clayton Road in the north of the Project Site.

A range of technical studies have been completed to understand potential impacts and to inform changes to the Project design to result in the Indicative Project Layout (as described in **Section 3.2**). General requirements, locations, and designs of Project infrastructure are sufficiently known to enable assessment of potential impacts for the Indicative Project Layout. Final studies and assessment of impacts as described in this report are based on a "worst case scenario" of impact as related to the Indicative Project Layout and maximum scale of turbines. Any potential amendments to the Project that result in a reduced level of impact would then be considered acceptable.

The Project will include the following key infrastructure elements within the Indicative Project Layout presented in **Figure 1.2:**

- Permanent operations infrastructure:
    - Up to 25 wind turbines and associated foundations and hardstands.
    - A 100 MW/ 200 MWh BESS.
    - Underground cabling.
    - Overhead transmission line and towers to the existing Western Power network.
    - Communication towers (two).
    - Meteorological masts (two).
    - Operations and maintenance buildings.
    - Electrical connections, substations and grid connection terminal.
    - External site access and internal access roads.

- Firewater tanks.
- Utilities (water and effluent management).
- Fencing.

- Temporary construction infrastructure:
  - Contractor compound.
  - Laydown areas.
  - Turbine hardstands (temporary).
  - Temporary accommodation camp.
  - Concrete batching plant.
  - Site security and access areas.
  - Construction water supply.
  - Stock fencing and gates.
  - Utilities (water and effluent management).

The Project construction period is estimated at approximately 33 months. The workforce is expected to fluctuate in size throughout this period, with an estimated peak construction workforce of 250 personnel. The workforce will likely stay in nearby townships, with a temporary accommodation camp on-site also being considered as a contingency.

The Project may seek to develop onsite borrow pits and quarries to support construction. The locations of these will not be known until the geotechnical investigation program has been completed. Borrow pits and quarries have therefore not been included in this application, but should they proceed, approval will be sought via a separate Development Approval (DA).

It should be noted that the traffic volumes used within the impact assessment conservatively assumed no on-site temporary accommodation camp and that bulk fill material cannot be sourced on site and has to be imported. During operations, both on-site and off-site personnel will manage the Project. It is expected that the Project will generate 10–15 permanent, full-time jobs throughout its 30-year operational life.

Towards the end of its operational life, Neoen may choose to undergo decommissioning and rehabilitation of the land in accordance with a decommissioning management plan and relevant approval conditions. It is possible that Neoen may choose to instead re-power the Project by installing new equipment, but this would be subject to future planning and environmental approvals, land agreements and commercial outcomes. Neoen have committed to funding a decommissioning security as part of their legal agreements with the landowners, to provide confidence and assurance that the cost of decommissioning and rehabilitation is covered by the Proponent. Further details on decommissioning are provided in **Section 3.8** and **Appendix A**.

3.2 Design Evolution

The Indicative Project Layout has been defined through an iterative design process, informed by ecological, heritage, noise, landscape and visual, hydrological, aviation, EMI, shadow flicker, and wind generation optimisation modelling studies. These studies have informed avoidance and mitigation of environmental and amenity impacts. Technical studies relevant to this application are summarised in **Section 7.0**.

Figure 3.1 illustrates how studies were phased and design reviews conducted to develop a design that balances environmental impacts, planning requirements and Project feasibility.

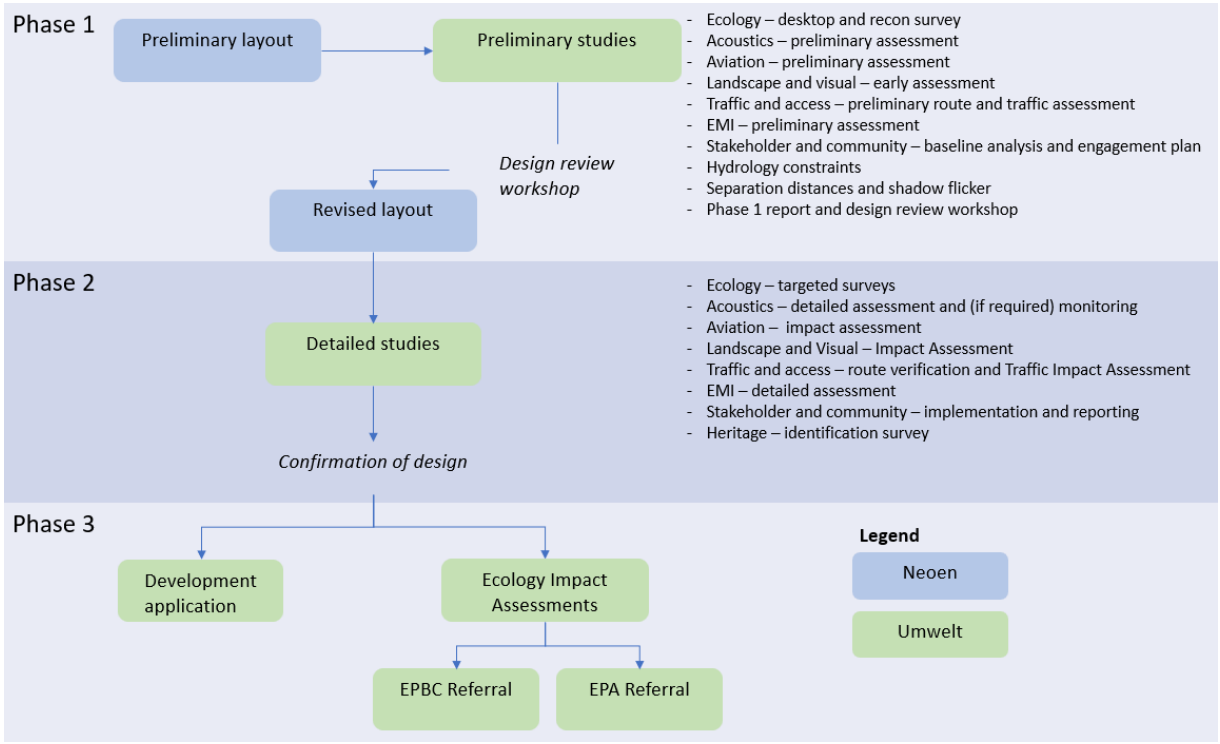


Figure 3.1 Study Phases to Inform Indicative Project Layout

Key design changes made during the iterative design process to develop the Indicative Project Layout include:

- Reduction in the number of turbines from 40 to 25.
- Reduction in the Project Site from 9,300 ha to 6,344 ha.
- Introduction of a BESS and temporary accommodation camp (as a contingency measure).
- Removal and relocation of turbines to ensure WA Environmental Protection (Noise) Regulations 1997 will be met at existing non-involved sensitive receptors and to reduce encroachment of the modelled 35 dB noise contour on adjoining properties.
- Removal and relocation of turbines in consideration of potential aviation impacts, including conservative setbacks to allow continued aerial crop spraying on adjoining properties.

- Relocation of turbines to provide a minimum conservative setback of 325 m from adjoining property boundaries.
- Removal and relocation of turbines to reduce visual impact to the town of Williams and adjoining rural residential zoned land that might be developed in future.
- Relocation of infrastructure to avoid areas of very good vegetation, good vegetation and habitat that has a higher potential to support conservation significant fauna.
- Relocation of infrastructure to minimise clearing of native vegetation, with clearing not to exceed 7.41 ha of native vegetation and 0.98 ha of planted vegetation.
- Locating the transmission line connection to the existing 220 kV line to minimize clearing of native vegetation.

Due to confidentiality reasons Neoen are unable to provide an early iteration of the Project design to demonstrate the above changes, however a figure was provided as part of the Pre-Lodgement Part 11B process.

The Project will undergo a detailed design phase following a competitive tender and contract award for equipment supply and construction. The detailed design process will rely on future technical assessments, including geotechnical investigations, on-ground cultural heritage surveys, and additional targeted ecological surveys. This process will define the final positioning of Project infrastructure as well as the Final Project Layout.

3.3 Design Flexibility

This Development Application has been prepared on the assumption that a level of design flexibility and micro-siting would be allowed post approval to account for outcomes from detailed design, detailed environmental and heritage surveys, and geotechnical investigations, noting these are unable to be factored in at the development application stage. This approach aligns with recent referrals under the EP Act and EPBC Act and allows for the Project to further reduce environmental and planning impacts where practicable.

The Proponent proposes to adopt a micro-siting approach to:

- Ensure that sub-surface conditions are suitable for footings and foundations.
- Ensure that there is sufficient flexibility to avoid:
    - site-specific flora and fauna impacts, (e.g. Rank 1 and 2 black-cockatoo breeding trees)
    - impacts on cultural heritage (Aboriginal or historic) identified during surveys.
- Help facilitate a compromise position to allow shared land uses (such as renewable energy production and farm management).
- Address any other unexpected local construction constraints that might require minor changes.

The Proponent emphasises its understanding that post-approval micro-siting does not permit a project to exceed the impact limits imposed by any condition of approval such as minimum separation distances from dwellings or noise emissions at existing sensitive receivers.

The following sections describe permanent and temporary infrastructure, including proposed micro-siting tolerances for different infrastructure types.

3.4 Permanent Project Infrastructure

A range of permanent infrastructure will be constructed to support the Project. Details of the type, number, location, micro-siting allowance and reference drawings for permanent infrastructure proposed to be constructed are presented in **Table 3.1**. The indicative layout of permanent project infrastructure is presented in **Figure 3.2.** Note that drawings are indicative only and subject to final detailed design.

Table 3.1 Summary of Permanent Project Infrastructure

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Turbines	Quantity: Up to 25 turbines Maximum hub height: Up to 200 m AGL Maximum tip height: 291 m AGL Minimum tip height: 49 m AGL Generation capacity: Up to 200 MW Final design, including hub height, blade length and maximum tip height is dependent upon outcomes of commercial tender. All turbines will be the same equipment model, size, and will spin in the same direction.	Within 300 m of proposed location as per WGA240189-SK-CV-1004. Setback from Project boundary to be minimum 325 m and setback from dwellings to be based on demonstrable compliance with adopted noise criteria.	1) General location WGA240189-SK-CV-1004 Sheets 1 through 6 2) Wind turbine elevation NGN-WF-DR-1002
Turbine hardstands	Quantity: Up to 25 permanent turbine hardstands Area of hardstand: Approximately 0.65 ha Final design based on turbine model selected and topology at turbine location.	Within 300 m of proposed location as per WGA240189-SK-CV-1004. Location will ultimately be dictated by wind turbine location and criteria for the turbines. No specific setback requirements.	1) General location WGA240189-SK-CV-1004 Sheets 1 through 6 2) Typical hardstand WGA240189-DR-CV-0010
Battery Energy Storage System (BESS)	The BESS will have a capacity of up to 100 MW/200 MWh, will occupy an area of approximately 1 ha, and may consist of: • Battery containers. • Inverters. • MV transformers. • Control and switchgear equipment. • Lightning protection masts. • Security fencing. The final configuration will depend on the equipment supplier selected. The maximum capacity of the batteries within the site will be 200 MWh.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m. Setback from dwellings to be based on demonstrable compliance with adopted noise criteria.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Concept plan NGN-ES-DR-2102
Underground cabling	Power and communication cables will be installed underground (600 and 1,500 mm) between the turbines and will connect back to the substation and the O&M facility. The cables will be laid in cable trenches to allow for continued agricultural activities. The total length of cable reticulation is estimated to be 250 km.	Cables will be within the Project boundary and their routing will generally be adjacent to the internal access roads where available. Any vegetation clearing required will be bound by the limits set within environmental approvals granted for this Project. Where applicable a Beds and Banks permit will be sought under the RIWI Act for water crossings.	1) General location WGA240189-SK-CV-1004 Sheets 1 through 6 (follow route of access tracks)

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Transmission line and towers	A 5 km overhead line will connect the substation in the centre of the site to the existing Western Power 220 kV line located at the southern boundary of the site. The overhead line will be supported on lattice tower structures up to 60 m tall at 250 m to 400 m intervals. Reduced spans between towers may be required near crossings of rivers and roads, or where there is a change in direction. A 70 m wide corridor with no vegetation exceeding 3 m height will be required.	Within 300 m of proposed alignment as show on WGA240189-SK-CV-1004.	1) General location WGA240189-SK-CV-1004 Sheets 6 and 7. 2) Indicative transmission tower elevation: W_APD08252-DRG-001
Proponent Communication Tower	Quantity: Up to 1 Height: Up to 70 m tall Tower key features shall be • Steel lattice self supporting or guy wired tower. • Multiple microwave transmitter/receivers between 15 m and 65 m. • Multiple radio transmitter/receivers between 15 m and 65 m. • Relay and instrument cabinet.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m. Setback from non-involved dwellings will be a minimum of 1500 m.	1) General location **Figure 3.2** 2) Communications tower section and plan NGN-WF-DR-1201
Western Power Communication Tower	Quantity: Up to 1 Height: Up to 70 m tall Tower key features shall be • Steel lattice self supporting or guy wired tower. • Multiple microwave transmitter/receivers between 15 m and 65 m. • Multiple radio transmitter/receivers between 15 m and 65 m. • Relay and instrument cabinet.	Within the 110 x 180 m area allocated for the Western Power terminal located adjacent to Graham Road in Lot 1066 on Plan 102908. Setback from Project boundary to be minimum 25 m. Setback from non-involved dwelling will be a minimum of 500 m.	1) General location **Figure 3.2** 2) Communications tower section and plan NGN-WF-DR-1201

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Meteorological Mast	Quantity: Up to 2 Height: Up to 162 m Mast key features shall be • Steel lattice guy wired tower. • Multiple wind and climate measuring devices. • Aviation light. • Aviation marker balls. • Top 1/3 of mast painted red and white in alternating bands. • Solar panel for powering instruments. Stock fencing to protect based of mast and guy wires from livestock	The final locations of the met mast will be dependent upon the micro-siting and final layout of wind turbines. Setback from Project boundary to be minimum of 800 m. Setback from non-involved dwelling will be a minimum of 1500 m.	1) Met Mast arrangement drawings NGN-WF-DR-1101 through 1105
Wind farm O&M building	Transportable, modular or field erected office building including offices, IT servers, first aid room and facilities. Height: Up to 4 m Length: Up to 18 m Width: Up to 9 m. Rainwater will be harvested from the roof for grey water and ablution purposes. Potable water will be either trucked in or via a piped supply. Effluent will be to a septic tank, with leachate drain/soakway. Approval will be sought under the *Health Regulations 1974*.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1,250 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Wind farm O&M building isometric NGN-WF-DR-2001 3) Wind farm O&M building plan NGN-WF-DR-2002 4) Wind farm O&M building elevations NGN-WF-DR-2003
Wind farm stores building	Field erected portal frame stores with clad finish. Building will house spare equipment, workshop, showers, locker room and facilities. Height: Up to 9 m Length: Up to 30 m Width: Up to 20 m.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Wind farm stores building isometric NGN-WF-DR-2101 3) Wind farm stores building plan NGN-WF-DR-2102 4) Wind farm stores building elevations NGN-WF-DR-2103

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
BESS O&M building	Field erected portal frame stores and offices with clad finish. Mixed use building will house spare equipment, workshop, showers, offices, locker room and facilities. Height: Up to 6 m Length: Up to 28 m Width: Up to 13 m. Rainwater will be harvested from the roof for grey water and ablution purposes. Potable water will be either trucked in or via a piped supply. Effluent will be to a septic tank, with leachate drain/soakway. Approval will be sought under the *Health Regulations 1974*.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Isometric drawing NGN-ES-DR-2001 3) Plan drawing NGN-ES-DR-2002 4) Elevation drawing NGN-ES-DR-2003
Wind farm substation	The wind farm substation will occupy an area of approximately 1.5 ha, and may consist of: • HV switching and metering equipment. • HV step-up transformer(s). • Harmonic filters. • Capacitor banks. • Western Power relay equipment. • MV Switchgear. • Lightning protection masts. • Communication tower (see Proponent communications tower). • Security fencing.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1,250 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Substation plan drawing W_APD08252-DRG-0007 3) Substation arrangement/isometric W_APD08252-DRG-0006
Western Power terminal	The Western Power terminal will occupy an area of approximately 1.5 ha, and may consist of: • HV switching and metering equipment. • Western Power relay equipment. • Lightning protection masts. • Communication tower (see WP Communications tower). • Security fencing.	Within the 110 x 180 m area allocated for the Western Power terminal located adjacent to Graham Road in Lot 1066 on Plan 102908. Setback from Project boundary to be minimum 20 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 and 7 2) Terminal plan drawing W_APD08252-DRG-0005 3) Terminal arrangement/isometric W_APD08252-DRG-0004

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Site entry	Main site access is off Clayton Road via the upgrade of an existing farm access road opposite Rosedale Road. All primary infrastructure, plant and equipment will be delivered to site via this access point. Cornwall Road will be used as a secondary access to the electrical ancillary infrastructure/battery storage/substation area. Access to the southern portion of the site will be from existing local roads managed by the Local Government Authority, most likely Hancock Road and Glenfield Road.	Per locations illustrated in **Figure 1.2**.	1) Figure 1.2 2) Main site access shown in General location WGA240189-SK-CV-1004 Sheet 1
Access tracks	Access tracks up to 10 m wide connecting infrastructure within the Project area. Access tracks located on existing farm tracks where possible. Regular passing places and turning areas will be installed.	Tracks will be within the Project boundary and their routing will be such to ensure that the vegetation clearing is kept as low as is reasonably practicable. Any vegetation clearing required will be bound by the limits set within relevant environmental approvals granted for this Project. Where applicable, a Beds and Banks permit under the *Rights in Water and Irrigation Act 1914* (RIWI Act) will be sought post-approval for water crossings.	1) General location WGA240189-SK-CV-1004 Sheets 1 through 7
Main firewater tanks	Quantity: Up to 3 tanks Tank height: Up to 4.5 m Tank diameter: Up to 13.0 m Tank sizing will be determined as part of final design to ensure compliance with all applicable laws and guidelines. For the purpose of planning approvals, the proponent assumes no single tank will be in excess of 600 KL.	Within the 140 x 250 m area allocated for the wind farm substation, BESS and O&M facilities located 450 m east of Cornwall Road in Lots 1063 on Plan 102900 and 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m.	1) General location WGA240189-SK-CV-1004 Sheet 6 2) Main fire water tank section and plan NGN-WF-DR-1301
Remote firewater tanks	Quantity: Up to 6 tanks Tank height: Up to 3 m Tank diameter: Up to 5.5 m While up to six tanks may required, only three are currently anticipated. Tank sizing will be determined as part of final design to ensure compliance with all applicable laws and guidelines. For the purpose of planning approvals, the proponent assumes no single remote tank will be in excess of 65 kl.	Tanks will be distributed within the site and located to ensure compliance with local regulations and planning policy. Setback from Project boundary to be minimum 20 m.	1) General location WGA240189-SK-CV-1004 Sheets 1 through 6 and **Figure 3.2** 2) Remote fire water tank section and plan NGN-WF-DR-1302

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Turkey nest dam	Earth walled turkey nest dam with lining, created to provide onsite inventory and ensure security of supply. Water for the dam will be supplied from the Watercorp pipeline south of Williams Kondinin Highway. Capacity: Up to 1,000 m^3 of water. The turkey nest dam will be primarily used during the construction stage however may be left in place should a permanent beneficial use be identified for it.	Within the 100 x 100 m area allocated for the batching plant located 750 m east of Cornwall Road in Lot 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m. Setback from non-involved dwelling will be a minimum of 1500 m.	1) General location WGA240189-SK-CV-1002 Sheet 6

FIGURE 3.2
Permanent Project Infrastructure - Indicative Layout

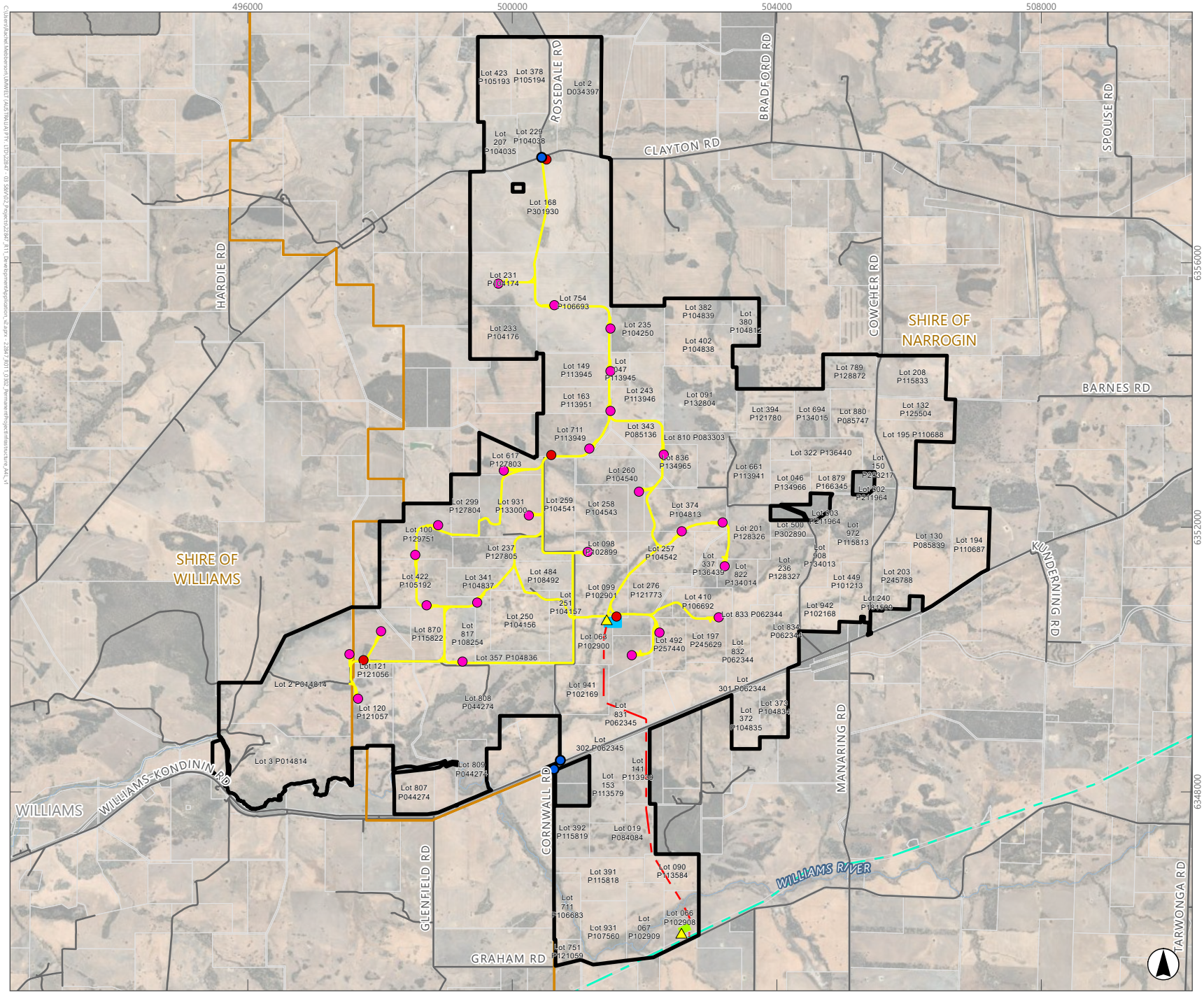


Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), DBCA (2023), WP (2023) **Footnote:** Refer to Table 2.1 for Lot details.

3.5 Temporary Project Infrastructure

A range of temporary infrastructure will be constructed to support the Project. Upon completion of the construction phase, the temporary infrastructure will be removed and the areas returned to their previous land use. Details of the type, number, location, micro-siting allowance and reference drawings for temporary infrastructure proposed to be constructed are presented in **Table 3.2**. The indicative layout of temporary project infrastructure is presented in **Figure 3.2**. Note that reference drawings are indicative only to illustrate the likely form of infrastructure.

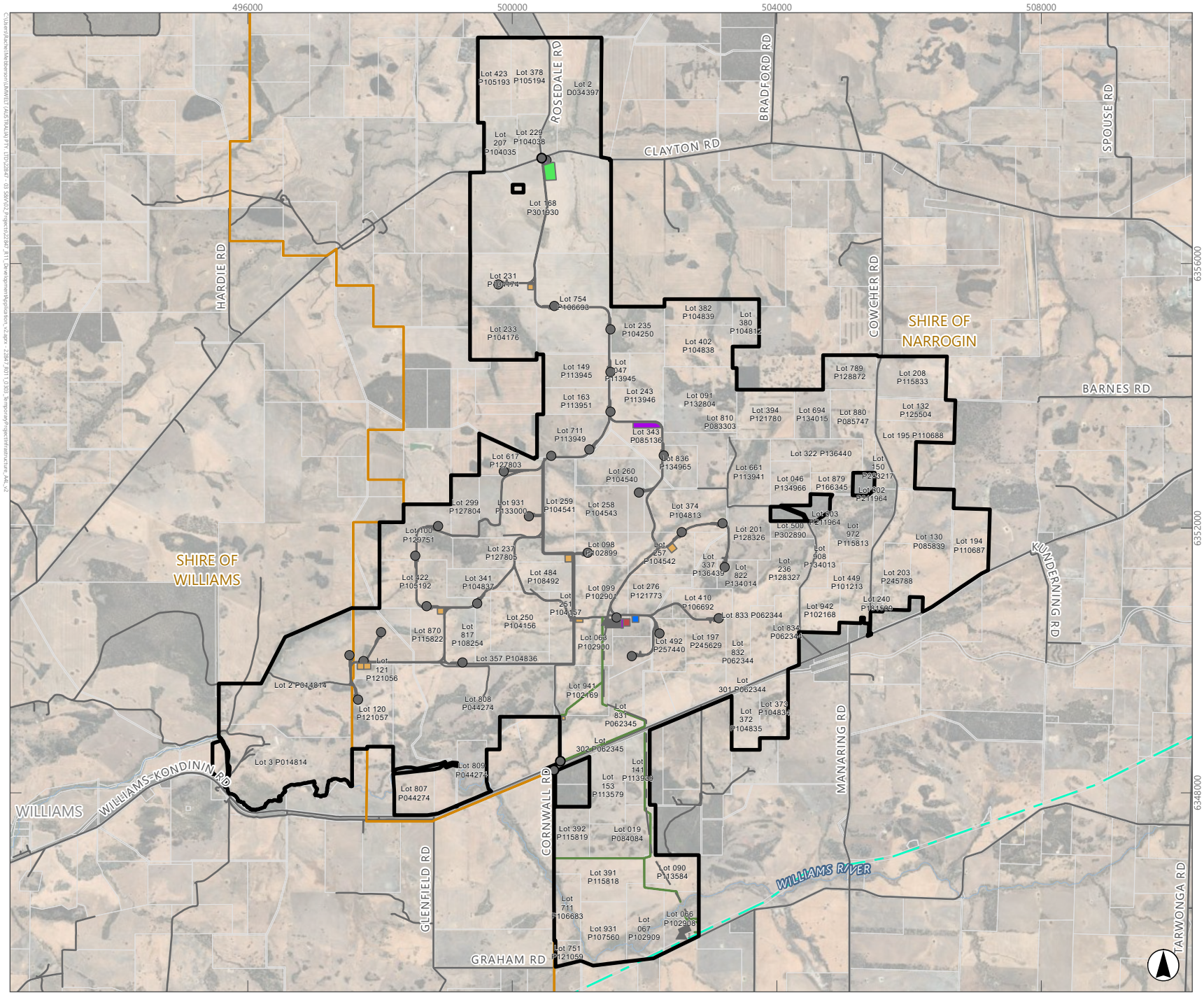
Table 3.2 Summary of Temporary Project Infrastructure

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Contractor compound	The construction contractor's compound is intended to house temporary office and stores buildings/containers and parking for workers. Power will be provided by temporary generators, while water and sewage will be trucked in and out. The compound will also include a large graded area/hard stand with 1.8 m cyclone style fencing intended for the safe storage of oversize equipment and materials such as wind turbine blades and tower sections. Quantity: 1 Size: Up to 4 ha	Compound to be located in a relatively flat cleared area within the Project boundary. Provisionally located within Lot 11343 on Plan 085136, however in the event no workers accommodation camp is required it may be located within Lot 168 on Plan 301930 off Clayton Road and adjacent to the main site entrance. Setback from Project boundary to be minimum 25 m.	1) General location WGA240189-SK-CV-1002 Sheet 2 and **Figure 3.3**
Laydown areas	Graded area/hard stand with 1.8 m cyclone style fencing intended for the safe storage of equipment and materials. Area may also include temporary transportable toilet facilities and shaded/refuge area for workers. Quantity: Up to 5 Size: 100 x 100 m	Remote laydown areas will be distributed within the Project boundary and five locations have been identified. Setback from Project boundary to be minimum 750 m.	1) General location WGA240189-SK-CV-1002 Sheets 1 through 6
Turbine hardstands (temporary)	Two temporary cleared and graded areas will be constructed at each turbine during the construction phase to support the construction of the crane boom and for the laydown of the blades prior to lifting into place. Quantity: 2 at each turbine Size: 150 m x 15 m for the crane boom and 95 m x 20 m for the laydown area.	Within 300 m of proposed location as per WGA240189-SK-CV-1002 Sheets 1 through 6. Location will ultimately be dictated by wind turbine location and criteria for the turbines. No specific setback requirements.	1) General location WGA240189-SK-CV-1002 Sheets 1 through 6
Temporary accommodation camp	It is expected that some of the workforce will commute from the wider local areas and will not require additional accommodation. The preferred accommodation option for the remaining construction workers is in housing in the surrounding localities and towns. Should no suitable workforce accommodation option in the surrounding localities be identified, a temporary accommodation camp may be constructed. The temporary accommodation camp would have a maximum capacity of 250 persons, consisting of modular/transportable buildings including:	Accommodation to be located in a relatively flat cleared area within the 4.5 ha area within Lot 168 on Plan 301930 off Clayton Road and adjacent to the main site entrance. Setback from Project boundary to be minimum 25 m.	1) General location WGA240189-SK-CV-1002 Sheet 1 2) Preliminary temporary accommodation camp layout WGA240189-SK-CV-1005

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
	• 60 x 4 person en-suite accommodation (14.4 x 3.3 m) • 6 laundry building (14.4 x 3 m) • 1 kitchen/diner (21 x 12 m) • 1 wet mess (12 x 9 m) Kitchen Diner • 1 sheltered dining area (12 x 12 m) • 1 recreation facility (18 x 12 m) • 1 medical facility (18 x 12 m) • 1 gym (12 x 12 m) • 4 toilet facilities (6 x 3 m) • 1 ice room (6 x 3 m) • 1 camp management office (12 x 6 m) • Wastewater treatment facilities and septic tanks • Diesel generators. The temporary accommodation camp will be removed at the end of the construction period and the site returned to its previous land use. Detailed design drawings will be provided prior to construction as part of the building permit process.		
Concrete batching plant	Concrete batching plant with total capacity up to 240 m^3/h, including: • Concrete truck loading hardstands. • Loading bays. • Hoppers. • Cement and admixture silos. • Water tank. • Stockpiles for aggregate and sands. • In-ground water recycling/first flush pit. The batching plant will comprise of mobile units and final design and arrangement will depend upon local rental supplier availability during construction.	Within the 100 x 100 m area allocated for the batching plant located 750 m east of Cornwall Road in Lot 6276 on Plan 121773. Setback from Project boundary to be minimum 1250 m. Setback from non-involved dwelling will be a minimum of 1500 m.	1) General location WGA240189-SK-CV-1002 Sheet 6 2) Indicative layout WGA240189-SK-CV-1006-1 3) Indicative elevation WGA240189-SK-CV-1006-2
Site security and access areas	Graded area/hard stand intended to house transportable security personnel hut, vehicle inspection area and washdown facilities. Quantity: Up to 5 Size: 25 x 25 m	Located at site entrances from public roads.	1) General location WGA240189-SK-CV-1002 Sheets 1 through 6

Infrastructure	Key parameters	Location and micro-siting constraints	Reference drawings (Appendix Q)
Construction water supply	Routing of temporary water supply from existing Watercorp pipeline south of Williams Kondinin Highway. Line length will be up to 8 km long (depending on routing) and for the most part will be above ground within the Project boundary. In order to cross the Williams Narrogin Highway it is anticipated that horizontal directional drilling (HDD) will be used and additional laydown areas have been allocated for this works. The final design and construction including any permits will be undertaken by Watercorp. High level estimates for water volumes required over the construction period are up to 500 kL/day. Water Corporation has confirmed that there is sufficient availability to meet the Project requirements, and a Water Supply Proposal has been generated by Water Corporation to further inform provision of water for the Project.	The routing of the line will be within the Project boundary from the proposed tie-in location at the existing Watercorp pipeline (501263, 6348639) to the concrete batching plant and turkey nest dam that is 750 m east of the Cornwall Road in Lot 6276 on Plan 121773. The line routing is anticipated to follow the boundary of Cornwall Road reserve inside the farm paddocks of involved landowners.	1) General location WGA240189-SK-CV-1002 Sheet 6
Stock fencing and gates	Stock fencing up to 1.8 m tall including gates and cattle grids. Temporary fencing and gates have not been shown on drawings and their location will change throughout the construction phase as work fronts move from one area to another.	Fencing will be within the Project boundary and their placement will be such to ensure that the vegetation clearing is kept as low as is reasonably practicable and to minimise restrictions imposed on farming activities. Any vegetation clearing required will be bound by the limits set within the EPA approval granted for this Project.	Not applicable.
Wastewater management	Wastewater effluent generated during construction will either be: • captured in holding tanks and taken offsite for treatment and/or disposal at an appropriately licensed facility; or • discharged to and treated in an onsite wastewater treatment system (most likely leach drains) in accordance with relevant permits and licences.	At temporary accommodation camp, contractor compound, concrete batching plant and laydown areas.	1) General location WGA240189-SK-CV-1002 Sheets 1 through 6

FIGURE 3.3
Temporary Project Infrastructure - Indicative Layout



Legend

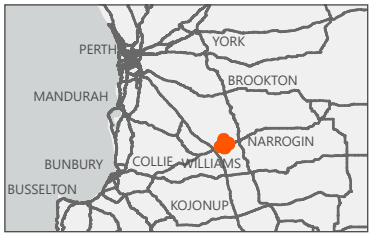
- Project Site
- Local Government Area Boundary
- Road
- Existing 220kV Transmission Line
- Major Watercourse

Indicative Project Layout

- Permanent Infrastructure

Temporary Infrastructure

- Site Security
- Accommodation Camp
- Laydown Areas
- Batching Plant
- Contractors Construction Compound
- Turkey Nest Dam
- Internal Roads (Temporary)



0 1.6 3.2

Kilometres

Scale 1:80,000 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), DBCA (2023), WP (2023) **Footnote:** Refer to Table 2.1 for Lot details.

3.6 Construction Overview

The chosen Engineering, Procurement and Construction (EPC) contractor will be responsible for the detailed construction methodology for the Project. The following sections describe a typical construction methodology for a wind farm Project.

3.6.1 Timeframe and Activities

The construction period for the Project will be agreed between the EPC contractor and Neoen, and will be subject to change depending on weather conditions, availability of materials, and construction schedules. The construction timeframe is estimated to be up to 33 months. Subject to Project approvals, construction is expected to commence in 2025 and conclude in 2028. Commissioning of the Project is scheduled to start in 2028.

During the construction phase, works will typically occur for six days each week (Monday to Saturday), and up to 12 hours per day (06.30 to 18.30). During certain construction activities, such as foundation pours and turbine lifts, works may be required to run longer than 12 hours for safety and quality purposes. It may also be necessary for construction activities to take place on a Sunday or during the nighttime.

Some enabling works will be required between approval of the Project and commencement of construction. This will include:

- Detailed site investigations for the purposes of micro-siting the turbines.
- Site establishment (temporary site facilities, lay down areas, equipment and materials).
- Temporary accommodation camp establishment (on-site or off-site, as per **Section 3.6.4**).
- Road improvement works.
- Obtaining all necessary secondary permits and consents for transport and construction.

For the construction of the Project, the following activities are expected to occur:

- Earthworks for access roads and wind turbine hardstands.
- Excavation for the foundations.
- Construction of wind turbine foundations (bolt cage, reinforcement and concrete).
- Construction of BESS, substation and ancillary infrastructure.
- Installation of electrical and communications cabling and equipment (including overhead feeders from cable marshalling points to the substation).
- Installation of wind turbine transformers, in parallel with electrical reticulation works.
- Installation of towers for the wind turbines, and delivery of the wind turbine components to the Project site.
- Erection of wind turbines, using high-level mobile cranes.

- Installation of overhead powerline and associated towers/poles.
- Commissioning of wind turbines, followed by reliability testing.

The activities listed above will predominately occur in the order listed, however some of these activities may be carried out concurrently to minimise the overall length of the construction programme.

3.6.2 Equipment and Machinery

The major equipment and machinery that is likely to be used for each component of construction of the Project includes:

- For site mobilisation: track loader, grader, backhoe, trucks, small crane and generators.
- For access roads and hardstands: track loaders, excavators, graders, trucks (with trailer), water carts and rollers.
- For wind turbines: excavators, rock breaker, concrete trucks, trucks (with trailer and vacuum), larger crawlers cranes, medium crawler cranes, small crawler cranes and generators.
- For electrical reticulation works: trencher, backhoe, excavator, grader, tractor and small terrain crane.
- Other equipment and machinery may be required, depending on the construction techniques nominated in the detailed design phase.

It is expected that one of each turbine component type will be delivered in a single day during the haulage operation (i.e. one blade, one tower section, nacelle, cooling tower, and turbine hub). Each individual component will be carried on a single oversize-overmass (OSOM) vehicle.

3.6.3 Construction Traffic and Transport

A Preliminary Route Assessment was undertaken in mid-2023 to identify a feasible route to allow the transport of Project infrastructure from Port to Site. Two Port options were assessed; Australian Marine Complex in Henderson and Bunbury Port in Bunbury. Bunbury Port was identified as the preferred option and three routes from Bunbury Port to site were assessed, with the preferred route illustrated in **Figure 3.4.**

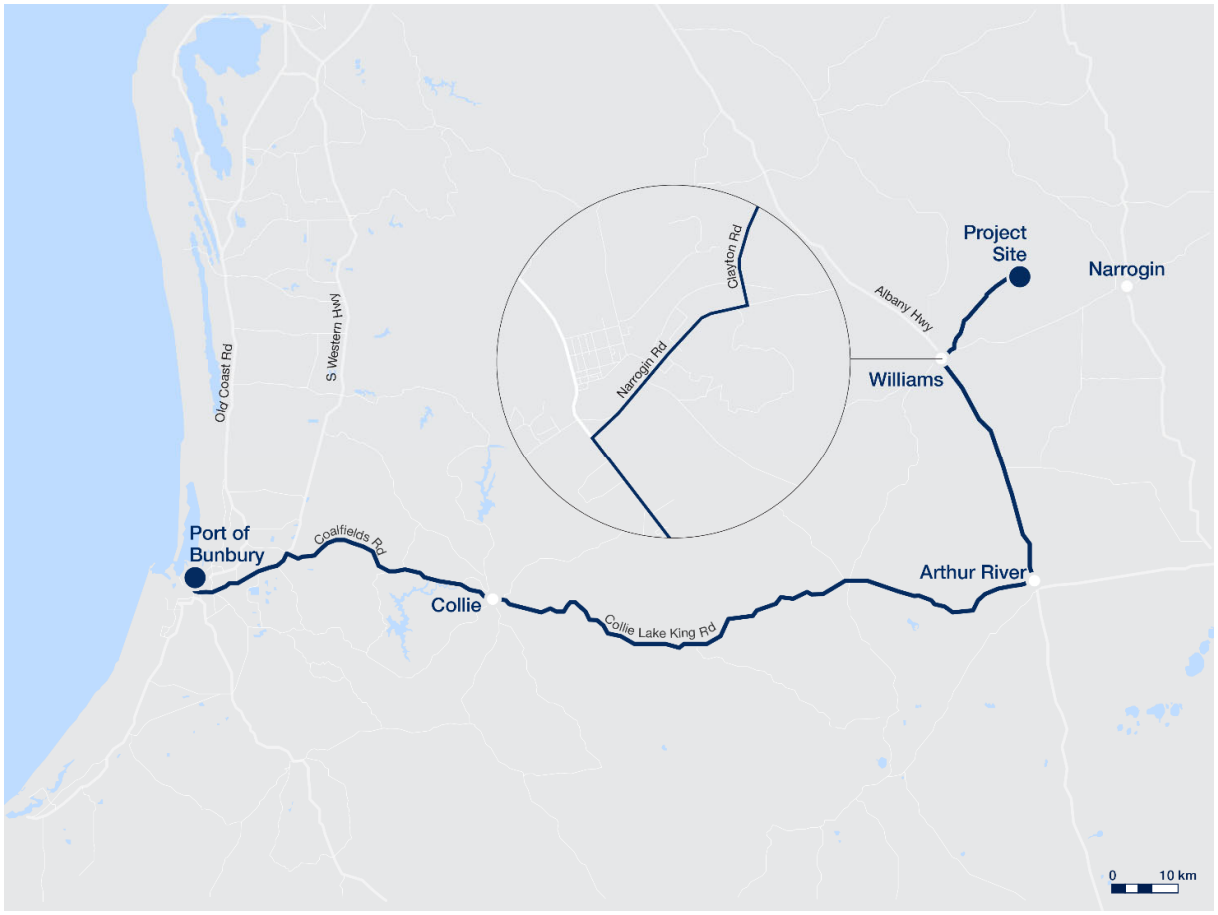


Figure 3.4 Project Transport Route – Bunbury Port to Site

The level of traffic generation for the Project has been assessed and then compared against other similar projects to provide assurance that the scale of movements and general profile of traffic associated with the project is appropriate.

Peak construction activities are expected for a duration of six months immediately prior to installation of the turbines. The movement of vehicles during this period is associated with the workforce mobilising to establish and construct the pads for the base of the turbines as well as works associated with the internal road network and establishment of the other work sites in the Project Site. At peak traffic movements (months 12 and 13), over 500 vehicle movements per average weekday are forecast.

It should be noted that the traffic volumes used within the impact assessment conservatively assumed no on-site temporary accommodation camp and that bulk fill material cannot be sourced on site and has to be imported.

Further details on traffic and transport is provided in **Section 7.5**.

3.6.4 Workforce and Accommodation

It is estimated that the peak construction workforce will comprise of approximately 250 staff during the 33-month construction period. Neoen focuses first on hiring local people for projects.

It is expected that some of the workforce will commute from the wider local areas and will not require additional accommodation. The preferred option for accommodation for other construction workers is in housing in the surrounding localities and towns. Neoen will prepare a targeted Accommodation and Employment Strategy in consultation with the Shires of Narrogin and Williams and other key stakeholders that seeks to:

- Maximise local employment opportunities while minimising impacts to local businesses.
- Propose additional measures that may be adopted to ensure adequate supply and availability of accommodation to house the Project's construction and operational workforce.
- Ensure that any new accommodation that is developed, is sited within a reasonable distance from the Project Site and in an area that is considered suitable by local council(s). Engagement with the local councils has indicated that they already have suitable locations.
- Prioritise accommodation that avoids or reduces adverse social impacts on communities, such as impacts on the local housing market.
- Identify potential solutions for securing worker accommodation in preparation for the commencement of Project construction.
- Provide a framework and strategies for monitoring and responding to accommodation and employment needs for the Project.

The Shire of Narrogin has provided Neoen with a letter of support, with reference to further exploring options for workforce accommodation with broader benefits. A copy of this letter is provided in **Appendix B.**

Should no suitable workforce accommodation option in the surrounding localities be identified, a temporary accommodation camp may be constructed as described in **Table 3.2**.

3.6.5 Environmental Management

The Project will be governed by a Construction Environmental Management Plan (CEMP) which will include a management approach and actions to limit and reduce the potential impacts on fauna, native vegetation, hydrology and other environmental values.

A Preliminary CEMP that outlines the mitigation measures to be implemented for the Project has been developed and a copy is provided in **Appendix C**. The Preliminary CEMP will support approvals and be used as a foundation for the detailed CEMP which will be developed later as the Project progresses to the detailed design phase. The Preliminary CEMP includes management actions for the following aspects:

- Surface Water and Erosion
- Vegetation Clearing and Ground Disturbance
- Flora and Fauna
- Weed and Pest (Biosecurity)
- Aboriginal Heritage
- Air Quality and Dust
- Noise and Vibration
- Waste
- Hydrocarbon and Chemical
- Fire
- Demobilisation and Rehabilitation.

3.7 Operations Overview

3.7.1 Timeframe and Activities

Operations are targeted to commence in 2028 following the estimated 33-month construction timeframe.

Key activities that will be undertaken during the operational period will likely comprise of:

- maintenance of wind turbines and associated infrastructure
- safety management
- implementation of environmental conditions
- landowner liaison.

The chosen turbine manufacturer will be responsible for maintaining the wind turbines for a defined period of time following commissioning. Once the manufacturer's obligation expires, a suitably qualified contractor will be employed to visit the site and undertake regular inspection and maintenance activities. Ongoing maintenance of the access tracks will generally be undertaken to ensure safe access to all components requiring maintenance throughout the year.

In addition to regular maintenance activities, there will likely be instances of unscheduled maintenance. Unscheduled maintenance is more likely to be required at the Project start up and towards the end of the operational period as the end of the design life is reached.

3.7.2 Operations Traffic

During operations there is estimated to be up to approximately 30 traffic movements a week, primarily involving light vehicles. Ongoing access to the Project during operations will be via Clayton Road, Cornwall Road or Hancock Road. Access to each turbine, the BESS, and other ancillary infrastructure will be via internal access roads.

There are no minimum car parking requirements prescribed in the LPS No. 3 for the Rural zone. Sufficient car parking will be established at the Operations and Maintenance building in accordance with Australian Standard AS2890.1-2004 for ongoing operational personnel and as well as visitors.

3.7.3 Workforce

During operations, the Project will be managed by both on-site and off-site personnel, employed by, or contracted to Neoen. It is expected that the Project will generate approximately 10–15 permanent, full-time jobs throughout its operational life. No permanent accommodation infrastructure is proposed as Neoen will focus on hiring local people for the Project.

3.7.4 Expected Life of Operation

The proposed technology is expected to have an economic life of approximately 25–30 years.
The landowner agreements make provision for an initial lease term of 30 years as well as an additional term of 30 years.

3.8 Decommissioning and Closure Planning

At the end of the current lease term for the Project, a decision will be made to either:

- decommission the Project permanently; or
- remove the old turbines and seek to replace them with new, upgraded models.

In the event that the Project is permanently decommissioned, Neoen will take full responsibility for decommissioning and rehabilitation works. A Preliminary Decommissioning Plan has been developed to support approvals and a copy is provided in **Appendix A**. This will be used as a foundation for the Detailed Decommissioning Plan which will be developed as the Project approaches its end of operational life.

Decommissioning will likely include the following:

- de-energising plant and equipment
- dismantling and removing wind turbines and transmission lines, as well as all other aboveground buildings, foundations and equipment
- rehabilitation of disturbed land
- recycling of recyclable materials (including batteries).

Decommissioning of some elements may be subject to the landowner's discretion (such as access tracks).

As per accepted industry practice, decommissioning does not include the removal of infrastructure that is located more than or 600 mm below the surface, as the earthworks required cause considerable and unnecessary vegetation and soil disturbance, and this infrastructure, if left in place, causes no harm to the environment or disruption to agricultural practices.

4.0 Stakeholder and Community Engagement

4.1 Stakeholder Identification and Engagement Mechanisms

Neoen commenced engagement with key stakeholders regarding the Project in September 2022. The key objectives of the engagement to date have been:

- To inform stakeholders of the Project and its potential impacts to the environment and community.
- To understand the perspectives of local community stakeholders and stakeholder groups such that these perspectives can be considered as part of the Project design evolution.
- To engage early with regulators to understand areas of interest and potential concerns, such that these can be considered as part of the Project design evolution.

To identify key community stakeholders, a stakeholder identification process was undertaken as part of the development of the Projects Community and Stakeholder Engagement Plan (CSEP) (refer **Appendix D**). This process involved identifying community stakeholders with an interest in the Project, or those that may be directly and/or indirectly affected, including any potentially vulnerable or marginalised groups.

Stakeholders and their areas of interest that have been identified are summarised in **Table 4.1**. A further breakdown of local and community stakeholders that have been identified and engaged with is provided in **Figure 4.1.**

Table 4.1 Areas of Interest for Different Stakeholder Groups

Stakeholder Group	Stakeholder	Primary Area of Interest
State Government	Department of Water and Environmental Regulation (DWER)	• Ecological surveys and findings. • Extent of clearing and other impacts. • Referral under EP Act. • Surface water and groundwater permitting requirements. • Noise assessments and limits. • Emissions and discharges.
	Department of Planning, Lands and Heritage (DPLH)	• Planning approval in accordance with State Planning Framework. • Heritage.
	Department of Biodiversity, Conservation and Attractions (DBCA)	• Biodiversity aspects, including black cockatoos. • Offset options.
	Main Roads WA (MRWA)	• Transport of infrastructure from port to site. • Road upgrades and modifications. • Approvals and permits.
	Public Transport Authority (PTA)	• Crossing of PTA easement.
	Water Corporation	• Supply of water for construction.

Stakeholder Group	Stakeholder	Primary Area of Interest
	Western Power (WP)	• Connection to existing WP infrastructure.
	Southern Ports Authority	• Use of port for delivery of infrastructure.
Federal Government	Department of Climate Change, Energy, the Environment and Water	• Impact of Matters of National Environmental Significance. • Referral under the EPBC Act.
Local Government	Shire of Narrogin	• Community benefit sharing options. • Workforce accommodation. • Project layout and setback distances. • Road use and maintenance. • Employment opportunities.
	Shire of Williams	
	Shire of Collie	• Road use and maintenance.
	City of Bunbury	
Traditional Owners	South West Aboriginal Land and Sea Council	• Heritage protection and surveys. • Employment and contracting opportunities.
	Gnaala Karla Booja Aboriginal Corporation	
	Willman Aboriginal Corporation	
	Kaata-Koorliny Employment & Enterprise Development Aboriginal Corporation (KEEDAC)	
Surrounding landowners	Various	• Overview of Project. • Near neighbour benefits.
Local Community	Community members	• Project details. • Community benefit sharing options.
Service groups, businesses and service providers	Various	• Impacts on services and business.

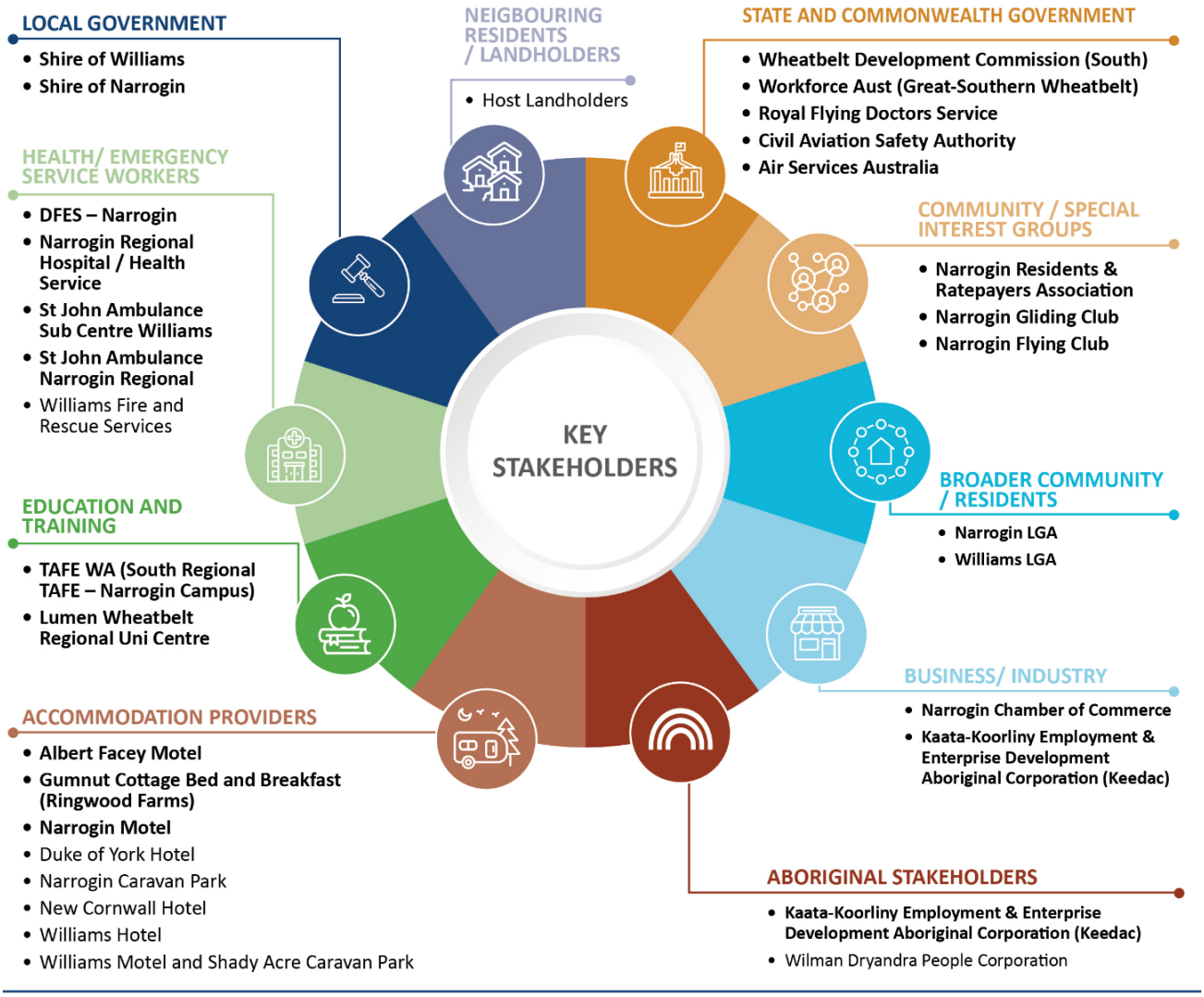


Figure 4.1 Local Stakeholder Groups Consulted

Early community and stakeholder identification and engagement has been undertaken by Neoen with the objective of building relationships with near neighbours and key stakeholders in relation to the Project. The stakeholder engagement methods adopted are presented in **Table 4.2.**

Table 4.2 Stakeholder Engagement Mechanisms

Mechanism	Objective	Targeted Stakeholder	Description
Project Briefings / Meetings	To understand approvals required and key issues to be considered / assessed.	Federal, State and Local government agencies	Project briefing meetings, update meetings and pre-referral meetings to identify items to be considered for Project design, approval and construction and operation.
Letter Correspondence	To inform adjacent landowners of the assessment and development process through the provision of Project information and additional opportunity for further engagement	Neighbouring landholders / residents	Letters correspondence containing Project information and key engagement mechanisms.
Website	To inform the community about key Project information and updates	Broader Community / All	Project website established to provide updates throughout Project life for all stakeholders and a mechanism to provide input/ feedback, including an online feedback form. Website updated with newsletters and information regarding Project milestones including advertising the community information sessions.
Local Media	To inform the broader community about key Project milestones and extend invitations to community information sessions.	Broader Community / All	Utilisation of local newspapers to inform the broader community about the Project and promotional information regarding the community information sessions and Project team contact details included with opportunities to provide feedback.
Community Information Booklet	To inform various stakeholder groups and the community about key Project information, provide project updates and outline who Neoen is.	Broader community	Neoen has developed a Community Information Booklet which provides an overview of Neoen and the Project.
Personal meetings / Interviews	To involve stakeholder groups to understand their concerns and ensure aspirations are considered.	• Local Government • Business / Industry Representatives • Local Service Providers • Education Providers.	Semi-structured meetings to identify potential Project impacts and opportunities from various stakeholder perspectives and suggestions with regards to mitigation/enhancement strategies. Interviews with key stakeholders conducted between December 2023 – May 2024. A total of 18 participants were involved.

Mechanism	Objective	Targeted Stakeholder	Description
Online survey	To involve stakeholder groups to understand their concerns and ensure aspirations are considered.	• Accommodation Providers • Local Service Providers.	An online survey sent to stakeholders to identify potential Project impacts and opportunities from various stakeholder perspectives and suggestions with regards to mitigation/enhancement strategies. Survey sent out in December 2023 following phone calls and made available until February 2023. A total of 3 stakeholders completed the survey.
Random telephone survey	To involve community members to understand their concerns and perceived opportunities regarding renewable energy projects in the region more broadly.	Residents across Narrogin and Williams LGAs	A random phone survey across the Narrogin and Williams LGAs was conducted between March and April 2024 to gather community perceptions of Neoen and renewable energy project developments. A total of 184 respondents participated in the survey.
Community Information Sessions	To involve various stakeholders groups about key Project information	• Community members • Community and special interest groups.	Drop-in sessions were held in Narrogin and Williams to provide updated information on Project developments and to gather further feedback on the Project. The first day of community information sessions were held in June 2023. The second day of community information sessions were held in September 2024.

4.2 Stakeholder Consultation Outcomes

Significant consultation has been undertaken with key Federal, State and Local regulatory authorities in additional to consultation with key landholders, Traditional Owner groups, the community and local service providers.

A summary of outcomes from consultation undertaken to date is presented in **Table 4.3** below.

Table 4.3 Stakeholder Consultation Outcomes

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
State Government Agencies and Regulators			
DWER - EPA Services	July 2023 Phone call Leanne Thompson	• EPA noted that Terrestrial Ecosystem branch is exploring guidance on birds and bats, and that noise and visual impacts expected to be managed via DA. • Discussed EPBC bilateral assessment (Part V) and accredited EPA process (Part IV). • Discussed Aboriginal Cultural Heritage Act reform.	• To continue engaging with EPA through project design process.
	August 2023 Pre-referral meeting Leanne Thompson	• Neoen presented studies completed and planned, early Project layout, preliminary key environmental factors. • EPA noted that based on information presented: Flora and Vegetation values did not appear significant, black cockatoo impacts and bird/bat impacts generally would require consideration in a referral, Social Surroundings not likely a key factor, and generally the project looks to be a "smaller" project and probably not require assessment through the Part IV process. Also commented that the Principle of Waste Minimisation is a front of mind issue at present.	• Proponent to continue with surveys and studies as described in presentation and will re-engage with the EPA when the Project is more defined.
	July 2024 Pre-referral meeting Alicia Dudzinska	• Neoen presented ecology surveys, assessments and key findings, the design evolution and how it has sought to minimise impacts. • Discussed black cockatoo impacts, including flight behaviours, breeding and habitat. • EPA advised that Flora and Vegetation, and Terrestrial Fauna appear to be the key preliminary environmental factors. • Social surroundings not expected to be a key environmental factor and should be addressed through DA process. • Discussed offset options being considered, and EPA notes that offset proposal should seek to provide a net biodiversity gain.	• Key studies have been completed. • Proponent will present Flora and Vegetation and Terrestrial Fauna as key preliminary environmental factors and Social Surroundings as other environmental factor, and include as much info as available on black cockatoos and mitigation of potential impacts. • To include EPA on future offset discussions.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
	September 2024 Alicia Dudzinska	• Neoen gave a presentation providing updates since previous pre-referral meeting. • Described the design evolution and design changes made to reduce impacts. • Summarised key outcomes from surveys and assessments, and mitigation measures proposed to further reduce impacts. • Presented residual impacts and their potential significance. • Discussed transport route.	• EPA advised key items appear to have been considered.
DWER – Environmental Noise Branch (ENB)	May 2023 to present Meetings, phone calls and emails	• Meeting held with DWER ENB to discuss application of noise levels for noise assessment purposes. • Early DWER ENB advice was that it would be appropriate to model and assess the windfarm noise in accordance with the South Australian Environmental Protection Authority – *Wind Farms Environmental Noise Guidelines*, and adopt the Environmental Protection (Noise) Regulations 1997 (WA Noise Regulations) lower limit of 35 dB(A) as the base limit at low wind speeds. • In subsequent correspondence via emails, DWER ENB advised they would support an assessment method which was able to demonstrate that a Project will not exceed the highest of either the assigned noise levels or the background noise level. • DWER ENB also noted the role background noise levels play in noise assessments and advised that for assessment purposes it may be necessary to consider the background noise levels which may reasonably be expected during compliance measurement.	• Detailed Noise Assessment completed noting advice from DWER. • Proponent awaiting further clarification on noise levels to be applied at existing involved receptors.
DWER – Licensing (Kwinana-Peel region)	March 2024 Meeting	• Neoen provided an overview of the project and sought advice on licensing under the EPA Act and RIWI Act. • Discussed preliminary hydrology study and flood risk assessment, DWER noted that this will likely require internal specialist review. • Bed and Banks (B&B) permit - A single permit application could be lodged for the entire project. It would need to nominate the maximum number of crossings, proposed locations and crossing methodology.	• Lodge a single B&B permit. • Provide flood modelling info to DWER when required. • Engage further to determine requirements for Works Approval for concrete batching plant.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
		• Noted Project will refer under Part IV of the EP Act. Should it not be assessed, then a NVCP application for the clearing of native vegetation would be submitted to DWER. • Groundwater abstraction unlikely as site not located in a proclaimed GW area and abstraction unlikely. • Works approvals unlikely to be required for wind turbines.	
DBCA	February 2024 and September 2024	• Black cockatoos, impacts and mitigations. DBCA officer noted that regional impact to movement or collision strike unlikely to be an issue and would follow up internally to advise further. • Offset requirements and options being investigated	• Once impacts and level of offsetting required are understood, meet with relevant Decision Making Authorities to further discuss option. • Follow up attempts to discuss black-cockatoo movement were unsuccessful.
	March 2024	• Proponent sought feedback on the potential impacts the Project may have on DBCA aviation activities. • DBCA advised that as part of the Governments initiative of Grain Harvest Waterbombers, they have three aircraft based out of the Narrogin Aerodrome from the 15th of November to the 30th of December each year. • For the rest of the year the airstrip gets occasional use by water bombers and other DBCA aircraft depending on bushfire activity and other operations. • DBCA has consulted with the main aviation contractor they use, and acknowledge that the turbines will be out of the Narrogin circuit so they should still be able to use the aerodrome as they currently do. However, DBCA further noted that wind farms pose a high risk for any low-level aerial fire suppression operations.	• N/A.
DPLH (SDAU)	November 2023, February 2024, June 2024, October 2024	• Introduction to project, discussion about the 2 main potential planning pathway approvals (DAP Pathway or the Part 11B SDAU/ Significant Development pathway), discussion of planning risks, WA Noise Regulations and planning controls, and aspects of Local Planning Policies. • Benefits of pre-lodgement consultation with DPLH. • DPLH noted that should the Project be referred to EPA/DCCEEW, they will rely on them to assess environmental impacts. Further noted that the WAPC can't approve a Planning Approval if it is under assessment by EPA.	• Pre-lodgement engagement recommended. • Part 11B suitable planning approval pathway. • Proponent sought written Pre-lodgement advice and State Referral Coordination Unit support.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
MRWA – Wheatbelt Division and South-West Division	June 2024, July 2024 Meeting	• Neoen provided overview of Project and described work undertaken to inform the transport route assessment. Two ports were considered and a numerous alternative road options. Preferred route is from Bunbury port. • Illustrated the swept paths for areas where road modifications may be required in the Wheatbelt district. No major issues identified. • Discussed potential clearing within road reserve, project timing and pinch points, and potential for strategic approach noting future similar Projects are likely. • MRWA spoke on options for engaging road works contractors. • MRWA suggested contacting them again in advance of DA submission.	• No key issues identified. Feasible route from port to site identified. • Traffic Management Plan to be shared with MRWA South West Office. • Timing of transport of OSOM will consider shift changes at local mines/businesses. • Contact MRWA prior to DA submission (completed).
	September 2024	• Discussed potential for the Main Roads reserve at the intersection of Clayton Road and Narrogin-Williams Road to be a PEC. Main Roads advised that based on their knowledge of the site it is unlikely to be a PEC due to clearing for a previous laydown area and most species not meeting requirements of the PEC. However a site diagnostic should be completed to confirm this.	• Will complete site assessment should clearing be required.
Public Transport Authority (PTA)	May 2024 November 2024 Phone and email	• Neoen contacted PTA to understand what approvals would be required. PTA sent through the relevant application form, however at the time the level of detail was unknown. Meeting to be held with PTA to provide greater overview of the Project and understand timing of approvals.	• Complete application form once details are known. • Arrange meeting with PTA to discuss project.
Water Corporation	May 2024 Phone and email	• Discussed options for local water supply options. Neoen noted there is a Shire standpipe in Highbury but is 35 km from the site. Requested information from Water Corp on any closer water supply options. Neoen noted there is a Water Corp mainline running through the site and queried if this could be a potential water supply. Water Corp took queries on board and committed to providing further advice. • Water corporation followed up with information on providing a standpipe nearer to the Project Site.	• Viable construction water source identified and to be finalised. Water supply proposal issued by Water Corporation to Neoen.
DFES	August 2023	• Consulted on potential EMI impacts. Conclude that only minimal EMI effect on DFES high-band communication, and unlikely any degradation to standalone VHF services.	• No action required.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
Western Power	September 2022 to Present Phone, email, and face to face meetings.	• Consulted on commencing a detailed enquiry assessment for the Project. • Neoen attended an enquiry assessment workshop with Western Power. This workshop provided a high-level scope, cost, and timeframe of various connection options were presented to Neoen, to consider how the Project may connect to the SWIS. • Neoen submitted Access Application to Western Power. Currently progressing through technical support studies to support the Connection Application.	• Submitted detailed assessment to Western Power, working through the initiation phase currently, and undertaking technical assessments.
Southern Ports Authority	November 2023	• Neoen discussed the potential use of the Bunbury port to deliver equipment and/or infrastructure to the Project Site.	• Confirmed the Port is a viable option. • Neoen to confirm shipping types and numbers once turbine model has been selected.
Federal Government			
DCCEEW	October 2023	• Project overview, discussion on proposed surveys. • DCCEEW referred to upcoming guidance on bird and bat surveys, suggested contacting Murdoch black-cockatoo research centre.	• BBUS designed to meet DCCEEW interim guidelines. • Meeting held with Murdoch on black-cockatoo data (further details below).
	May 2024	• Project overview, discussion on design evolution and how it has sought to minimise impacts, overview of ecology surveys, assessments and key findings. • More detailed discussions on risks to birds and bats. In particular black cockatoos. Referral should consider their regional context, their movement and behaviour patterns, and how the Project interacts with these.	• Studies to consider aspects raised by DCCEEW, in particular on bird and bat impacts.
	August 2024	• Discussion on design evolution and how it has sought to minimise impacts. • Overview of ecology surveys, assessments and key findings. • More detailed discussions on risks to birds and bats. In particular black cockatoos.	• Project to consider impacts to black cockatoos, particularly on how they use the Study Area and surrounding landscape. • Works and studies at latest meeting appear to address DCCEEW comments from previous meetings.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
Airservices Australia	January 2024	• Request for Airservices Australia assessment of the Project and its impact on sir services in the area.	• Proponent commits to advising the Vertical Obstacle Data (VOD) team at VOD@airservicesaustralia.com of any need to increase Grid LSALT heights at least two (2) weeks before construction commencing.
BOM	October 2023, July 2024	• Initial concerns on previous layout on BOM network were raised based on EMI, and noted as manageable in latest layout.	• Layout had been adjusted to mitigate impact.
Geoscience Australia	August 2023	• No impact on GNSS or Trigonometrical Infrastructure from the Project.	• No action.
CASA	N/A	• N/A	• Neoen will engage with CASA prior to lodgement of DA application.
Local Government			
Shire of Narrogin	Initial contact September 2022 Formal meetings: February 2023, August 2023, November 2023, April 2024, May 2024, July 2024 Multiple informal calls and meetings	Across a number of meetings the following items were discussed: • Neighbour benefit schemes and Neoen Community Benefit Sharing. • Setbacks from property boundaries and dwellings. • Iterations of turbine layout were provided. • Potential noise and aviation impacts noted as a concern of the Shire. • Visual and landscape impact not generally a concern to the Shire. • Accommodation for workforce. • Local Planning Policy (LPP) concerns and feedback, with Neoen noting that requirements of the LPP would make most wind projects unviable while being very conservative and not evidence based. • Potential for a special control area (SCA) to prevent sensitive land use encroachment on the wind farm (not supported by the Shire). • Neoen intent to follow Part 11B planning approval pathway.	• Layout amended to avoid and minimise aviation impacts. • Layout ensures compliance with neighbouring dwellings and minimises noise impacts outside the Project Site. • Shire will be consulted further on workforce accommodation and community fund options.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
Shire of Williams	Initial contact September 2022 Formal meetings: February 2023, December 2023, April 2024, July 2024, and August 2024 Multiple informal calls and meetings	Across a number of meetings the following items were discussed: • Local Planning Policy (LPP) concerns and feedback, with Neoen noting that requirements of the LPP would make most wind projects unviable while being very conservative and not evidence based. • Neoen intent to follow Part 11B planning approval pathway. • Accommodation for workforce. • Neighbour benefit schemes and Neoen Community Benefit Sharing.	• Layout has been amended in response to potential setback impacts. • Shire will be consulted further on workforce accommodation and community fund options.
Traditional Owners			
South West Aboriginal Land and Sea Council (SWALSC)	July 2023 October 2024	• Neoen provided draft Noongar Standard Heritage Agreement. The Agreement was duly executed by all parties in June 2024. • Neoen provided an Activity Notice to SWALSC which is in the process of being assessed.	• Continue to engage with SWALSC.
Gnaala Karla Booja (GKB) Aboriginal Corporation	February, March, April, August, October 2024	• Neoen contacted GKB and set up a meeting to discuss background on Neoen, the Project Design, Neoen's approach to Aboriginal and Indigenous Peoples – Kaban Wind Farm, NSHA Progress, and Project next steps.	• Neoen provided additional information to GKB on Neoen's Kaban Wind Farm, Qld, and Cultural Heritage Due Diligence report. • Continue to engage with GKB.

Wilman Dryandra People Corporation (WDP)	July 2024
	Meeting
		• Purpose of meeting was to meet the representatives of the group to introduce the Project, understand how the WDP would like to be engaged and discuss any initial questions they may have.
		• Key items discussed included:
		  ○ Engagement and communication with WDP going forward.
		  ○ Site survey.
			• Continue to engage with WDP.
			• Undertake site survey when layout has been finalised.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
		○ Background on Neoen as an organisation. ○ Project need and benefits. ○ Project timelines. ○ Employment opportunities. ○ Other community benefits. ○ Noise and visual impacts. ○ Impacts on birds.	
Kaata-Koorliny Employment & Enterprise Development Aboriginal Corporation (KEEDAC)	June 2023, July 2024	• Opportunity for employment and training for indigenous school leavers. • Importance of actively engaging with Keedac and keeping them updated. • Pathways for training and education to contribute to the windfarm. Participants in their programs, Thrive Program and Strong Women program, issues for employment after they sort out their issues. • Want to encourage the Aboriginal school kids to learn about wind farms.	• Continue to engage with KEEDAC representatives.
Surrounding landowners			
Surrounding landowners	September 2022 to Present	• Opportunity for involvement in Narrogin Wind Farm as an involved landowner hosting turbines. • Neoen's development process and different developmental milestones, likely timing of submissions. • Neoen's community and neighbour benefit funds, which have been implemented on other projects. • Invitation to partake in background noise studies. • Face to face meeting invites to talk through Neighbour Benefit Sharing (NBS) scheme. • Detailed information on Neighbour Benefit Sharing Scheme including annual remuneration.	• Neoen is committed to delivering an NBS scheme on the Narrogin Wind Farm to ensure near-neighbours can directly benefit from the region's energy transition. The NBS scheme based on the number of wind turbines within certain distances of a neighbour's primary residence. The nearer the turbines to a primary residence, the higher the amount on offer. • Neoen will continue to engage with surrounding neighbours throughout the projects lifecycle.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
Local community			
Community members	September 2022 to Present	Community consultation commenced in September 2022 and involved telephone interviews and surveys, information booklet distribution and four community information sessions in 2024, the latest held on 16 September 2024. The following key community concerns and benefits were identified. <u>Key Concerns</u>: • Incoming construction workforce causing strain on short-term accommodation and the housing market. • Lack of clarity around Project information and the distributive equity of compensation or benefits. • Disruption to existing farming practices. • Impacts to public health and safety. • Reduced amenity due to visual and noise impacts. <u>Key Benefits:</u> • Opportunity for further housing and accommodation development. • Procurement opportunities for local businesses and service providers. • Opportunities for employment, training, and upskilling of local people. • Economic benefits due to incoming construction workforce using local businesses. • Increased diversification of the local economy and industry.	The Project has already commenced implementation of social impact management measures to address the social impacts and realise the community benefits of the Project, including the development of a Community Benefit Sharing program. A number of Community Benefit Sharing initiatives were presented by Neoen during community information sessions, with the community asked to provide ideas for funding in the following areas: • Sporting & Recreation • Arts, Culture & Events • Energy Efficiency & Environment • Health & Wellbeing • Education & Training • Disaster Relief & Emergency Services • Tourism. The Project will also deliver a neighbour benefit scheme, going 'above and beyond' the state government's planning requirements for large-scale renewable energy project in WA.
Service providers, businesses and community groups			
Optus	August 2023	• Consulted on potential EMI impacts, and provided feedback on potential interference of turbine layout on services.	• Turbine layout adjusted to mitigate impact.
Telstra	July 2024	• Consulted on potential EMI impacts. No expected impact to Telstra network.	• No action required.
Vodafone	June 2024	• Consulted on potential EMI impacts. No expected impact to Vodafone network.	• No action required.
NBN Co	June and July 2024	• Consulted on potential EMI impacts. No issues with final layout.	• Layout had been adjusted to mitigate impact.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
WA Police	July 2024	• Consulted on potential EMI impacts. No concerns with final layout.	• No action required.
DFES – Narrogin		• Consultation undertaken with District Officer. • DFES uses aircraft for fire suppression, for observation and water bombing. Could be impacted by turbines, depending on location and height. If the turbines are a hazard to aircraft, the aircraft can't be used around them. • Expectation is that the turbines and other infrastructure would have a high level of protection and reduction of vulnerability to fire. Fire fighting would then have to rely on more ground based efforts. Project design needs to not increase the risk or impact of fire to neighbours. • If Neoen was largely self-sufficient with fire-fighting resources, and they have an adequate number of fire appliances and their employees were trained to an acceptable level with necessary equipment, that would be good because it would reduce any project fires before they got large. • Reduce the work needed for emergency services. Memorandum of Understanding for DFES and local govts for mutual support – if there was a fire nearby the project, could Neoen lend a helping hand. • Sharing info on what hazardous materials may be stored onsite. • Sharing emergency management plans would be useful.	• Continue engagement as the Project progresses.
Royal Flying Doctor Service	July 2024	• RFDS advised that they believe the turbines would not pose an issue for their operation at the present time. • The closest turbine is just on the circling limit for their PC12 aircraft and is not on the live side of the circuit.	• N/A.
Narrogin Gliding Club	Various	• Concerns that the turbines pose an increased hazard as the gliders get quite low and close to the paddocks. • Compliance with aviation regulations and what the Shire wants to do with the runways down the track was also raised. If the Shire wants to increase the capacity or rating of the runway to encourage others to come and visit, there are implications in terms of increased setbacks, proximity, height restrictions. • Concerns raised about gliders losing altitude and the added risk rotating turbines create.	• Continued engagement, seeking further inputs and advice on Project design. • Aviation Impact Assessment completed for the Project considered potential impacts to the Narrogin Aerodrome, including gliders.

Stakeholder	Date/s	Issues/Topics Raised	Proponent Responses/Outcomes
		• Met face to face with the Narrogin Gliding Club relating to concerns if turbines were sited too close to aerodrome.	
Narrogin Aero Club	April 2024	• General discussion relating to concerns of potential impacts to flight operations at Narrogin if turbines were sited too close to aerodrome. No formal response provided.	• N/A.
Ford Aviation	March 2024	• Email provided highlighting general concerns regarding wind farm development in farming areas, including safety and commercial concerns	• Consider advice in determining final turbine locations.

Narrogin Regional Hospital / Health Service	January 2024	• The Narrogin Health Service do not expect any significant impact on the services it provides from the Narrogin Wind Farm. The introduction of any new business brings welcome workforce opportunities for the Health Service, and the Health Service are confident that they have the capacity to meet the needs of any additional workforce from the wind farm.
		• Project benefits identified include:
		  ○ Economic benefits to the community during the construction phase.
		  ○ A more renewable power source should be supported.
		• Project challenges identified include:
		  ○ Additional competition for the already limited housing stock may impact the ability to attract and retain staff to the health service.
		  ○ A drive in, drive out workforce would result in extra traffic on Williams Road.
		  ○ The noise of the turbines could be an issue for some members of the community.
			• N/A.

Murdoch black cockatoo research centre	March 2024	• Umwelt met with representatives from the Murdoch University Black Cockatoo Research centre to discuss data availability to inform wind farm impact assessments in the Wheatbelt generally. • Murdoch presented tracking data from studies on the Swan-Coastal Plain but noted that there is a lack of black-cockatoo regional movement data in the Narrogin area and that flight height data is not available from Murdoch's tracking studies. Also noted concern that turbulence from wind farms could impact black cockatoo flight up to 2 km from turbines. Commented that many years (~5) of black cockatoo flight behaviour would be needed to understand potential impacts from wind farms. • Murdoch noted that wind proponents could fund University research on flight behaviour and regional movement.	• BBUS aiming to meet DCCEEW guidelines, and BBAMP provides measures for adaptive management and potential regional assessments of black-cockatoo movements.

4.3 Social Impact Assessment

A Social Impact Assessment (SIA) was undertaken to identify the key social impacts and opportunities for the Project to consider and assess as the Project progresses. The SIA comprised of the following key components:

- **Social baseline profiling** – understanding the key social characteristics and existing social conditions across the communities within the study area based on a review, compilation and analysis of secondary data and social research methods. The social baseline has utilised the Sustainable Livelihoods Approach (or Community Capitals Approach) (The Department for International Development (DFID), 1999) which draws on broad categories of community capitals (human, social, natural, physical and economic/financial) as a basis for identifying and further enhancing community capacity and resilience. This methodology has been further developed by (Coakes & Sadler, 2011) and applied in SIA practice. This provides a high-level snapshot of the study area's demographic profile along with identified key challenges and opportunities that may be of relevance to the proposed Project.
- **Community and stakeholder engagement** – consideration of how outcomes of engagement with key community stakeholders informs the assessment of potential impacts and opportunities.
- **Impact identification and evaluation** – identification and evaluation of the Project's potential impacts and opportunities, an assessment of their likelihood and magnitude and initial mitigation and enhancement strategies to correspond with each of these. As per standard SIA practice, social impacts were categorised according to a number of social impact categories utilising categories provided in the NSW SIA Guideline (Department of Planning and Environment (DPE), 2023), noting that social impacts often relate to more than one social impact category.

A summary of outcomes from the Social Impact Assessment are presented in the CSEP (**Appendix D**).

4.4 Future Consultation

Neoen aims to maintain community and stakeholder engagement throughout the project lifecycle, i.e., during development, construction, operation, and decommissioning. A dynamic CSEP has been prepared (**Appendix D**) and will be updated on a regular basis.

Continued consultation and engagement, through the means of social and traditional media, will encourage community involvement in the Project. Neoen will take particular care with key stakeholders, including neighbouring landowners, ensuring they are kept informed.

A specific email address, dedicated phone number, and a website has been set up to receive and address any expressions of concern from the community throughout the Project lifecycle.

5.0 Part 11B Pre-lodgement Engagement

5.1 Pre-lodgement Meetings and Submission

Neoen has engaged early with DPLH and WAPC as part of the Part 11B Significant Development Pathway process. This engagement has included:

- Initial meetings between November 2023 and May 2024 to discuss the Project and potential planning approval through the Part 11B Significant Development Pathway process.
- Submission of a pre-lodgement information and technical documents (10 June 2024), including:
    - Project overview and context.
    - Summary of how technical studies to date inform the Project design.
    - A brief overview of Project alignment with the State Planning Framework, summary of key planning issues and discretion being sought under Part 11B.
    - Summarised stakeholder and regulator engagement that had been completed at that point.
    - Provision of Phase 1 technical assessments which had been undertaken at the time of pre-lodgement including Flora and Fauna, Noise, Landscape and Visual, Aboriginal and Historic Heritage, Transport and Hydrology assessments.
- A formal pre-lodgement meeting with DPLH on 24 June 2024.
- Request for early engagement with local government and State government agencies through the State Referral Coordination Unit (SRCU), and for written advice on planning matters.
- Meeting with DPLH on 24 October to discuss the SDAU planning assessment provided to Neoen.
- Meeting with DPLH on (3 February 2025) following initial lodgement of the development application to address clarification queries and prepare this amended development application document.

The Shires of Narrogin and Williams were consulted on the Part 11B planning approval pathway prior to commencement of formal pre-lodgement.

5.2 SDAU Planning Assessment and Response

A response from SDAU was received on 2 September 2024 (SD-011-24), with notification that pre-lodgement consultation requirements have been satisfied under r.6 of the Planning and Development (Significant Development) Regulations. The response also included advice from the SRCU.

A summary of how items raised by the SDAU planning assessment and SRCU response have been considered, is provided in **Table 5.1**.

Table 5.1 Consideration of SDAU Planning Advice

Authority	Comments	Design or Application Response
SDAU	**Planning framework** As per SPP2.5 the application needs to demonstrate that there is no adverse impact on rural amenity of the locality considering matters such as agricultural, cultural and environmental and landscape elements of the land and that sufficient separation distances and management practices are included.	Technical studies have been completed to understand potential impacts and inform design. The Project has been designed to mitigate adverse impact on rural amenity values. Agricultural practices can continue on involved Lots and neighbouring Lots. Separation distances are sufficient to allow aerial crop spraying on neighbouring Lots, such that land can continue to be used for the primary purpose of cropping (see **Section 7.8**). See **Section 6.1.6** for an assessment against the objectives of *State Planning Policy 2.5*.
SDAU **DWER**	**Land use compatibility/Noise** The Position Statement identifies a minimum 1,500 m distance between noise sensitive land uses and turbines, which may be reduced subject to a supporting acoustic study demonstrating noise impacts to sensitive land uses are compliant with Environmental Protection (Noise) Regulations 1997 (Noise Regulations). The Phase 2 study updated noise assessment should demonstrate that the Project complies with the acceptable noise limits at all neighbouring sensitive land use sites, and with the Noise Regulations. Mapping supporting the application should be updated to show the noise contours for all Lots outside of the application area where noise is 35 db or above, including the cadastral lot boundaries. A number of technical comments were provided by DWER on noise modelling to be completed for the Project.	The Project design has sited all turbines a minimum of 1,500 m from existing non-involved sensitive receivers. Marshall Day Acoustics (2024) have undertaken a Detailed Noise Impact Assessment which has modelled the predicted noise from the Project at non-involved noise sensitive receivers. The modelling shows that the noise limits of 35 dB(A) limit can be met at all existing sensitive receivers. The Project has been designed to reduce the area of neighbouring properties that are affected by noise. Noise contours overlaid with adjoining properties and lots are shown in **Figure 7.1**. Further discussion on noise impacts are contained within **Section 7.3** of this report.
SDAU	**Boundary setbacks** In the absence of state requirements for minimum boundary setbacks from wind turbines, SDAU references the use of the 200 m setback as recommended in Australian Energy Infrastructure Commissioners Annual Report to the Parliament of Australia (2022) to neighbouring boundary fences and public roads, noting that this mitigates safety risks while providing the dual purpose of adequate setbacks as to not impact on neighbouring aerial spraying activities.	The minimum setback from a wind turbine to property boundaries for the Project is conservatively set at 325 m, exceeding the recommendations of the AEIC (200 m). The 325 m setback is based on the maximum tower height plus ~10% and data from other operating wind farms which has demonstrated that the probability of tower failure is very low. The setback was extended from 100 m as used in an earlier project design iteration as a conservative approach to negate the need for detailed assessment as related to safety.

Authority	Comments	Design or Application Response
	The Shire of Narrogin LPP recommends setbacks of minimum three (3) times the total height of turbines or 500 m, which would be 873 m based on the maximum tip height for the Project. Departures from the LPP should include, but not be limited to, an assessment using the policy objectives. The SDAU notes that a comprehensive rationale for the proposed 325-metre setback should be provided that demonstrates the safety and compliance of this setback distance, including the risk of turbine collapse and any protocols proposed to further mitigate risk.	The setbacks recommended in the Shire of Narrogin LPP have been considered as part of the Project design. Setbacks as recommended in the LPP are arbitrary and not based on evidence or the context of potential impact of a wind farm. Providing arbitrary setbacks of this magnitude would reduce the developable area of the Project such that it is not feasible. The Project design has been amended to provide greater setback to the boundaries of non-involved properties or existing dwellings considering industry best practice and provisions of the Position Statement. Setbacks are based on mitigation of impacts including noise, visual amenity, aviation, and not materially restricting agricultural practices on adjoining land. Based on this, setbacks of turbines from boundaries and sensitive receivers: • Exceed the minimum setback recommended by the AEIC. • Enable compliance with Noise Regulations at existing noise sensitive premises (**Section 7.3**) and limit the area of adjoining properties that are noise affected. • Consider outcomes of the Aviation Impact Assessment, including safe operation of the Narrogin Aerodrome if it became certified and ongoing aerial crop spraying at adjacent properties (**Section 7.8**). • Consider mitigation of impacts to visual receptors identified as part of the LVIA (**Section 7.4**). As per **Section 6.4**, discretion is being sought such that the setbacks specified in the LPP are not applied.
SDAU	**Future Development** The development of grouped dwellings on Rural zoned land can be permitted where it is satisfied there is justification for farm management or tourist activity purposes, with additional dwellings to be clustered in one location and avoid future subdivision pressure and minimise constraints on adjoining land uses. Future development rights on neighbouring properties under LPS 3 should be considered by the application. A future application should address how the location of turbines has considered the direct and material impacts on adjoining land and the ability to utilise the land as contemplated.	The Project design has undergone numerous revisions, including removal and relocation of turbines with the following considerations: • Mitigating potential amenity (noise and visual) impacts at existing non-involved sensitive land uses. • So that Rural Residential lots are not noise affected. • So lots with no existing dwelling and existing road frontage are not wholly affected by noise. • So that the predicted noise level at the project boundary is 45 db(A) or less (WA criteria for daytime noise levels).

Authority	Comments	Design or Application Response
	Consideration should be given to, but not limited to: the ability to obtain access to future dwellings via road; the farming quality of the land; and the suitability of the land to be used for accommodation. While it may be understandable for some land outside of the Project area to be affected by a noise buffer area, these impacts should not affect entire properties, thereby adversely affecting the future use of the neighbouring land. Further consideration should be given to how to manage the offsite impacts on nearby and adjacent landowners as the Project progresses. It is noted that if an adjoining landowner develops a new sensitive land use after the wind farm is developed and in operation, the onus is on the wind farm operator to still comply with the Noise Regulations.	The final noise levels will depend on the manufacturer selected and the final layout after micrositing. A Noise Management Plan will be prepared post approval that provides more detail as to how Neoen will design to achieve compliance and then subsequently demonstrate compliance in operation. The plan will detail the process for testing, managing complaints and provide potential mitigation strategies post construction if there is an exceedance of accepted limits. Neoen is aware that two Development Applications (DA's) were submitted and approved for dwellings immediately adjacent to the proposed Project after the project was made public and the first community information session held. While these have been approved, in Neoen's view: • The proposed dwellings by a private entity risk implementation of the proposed Project, which is in the public interest. • No building permit has been submitted for the dwellings. • Considering the location in relation to the proposed Project, the DAs are vexatious and submitted to prevent development of the wind farm. • The proprietor of the lots on which the DAs are proposed has a significant landholding in the area that are likely more suitable for the proposed dwellings (see **Section 6.4.4** and **Figure 7.1**). Further discussion on this matter is provided in **Section 6.4.4** below.
SDAU	**Aviation Safety** The development application should be accompanied by an Aviation Impact Assessment to determine the impact of the final turbine layout on the existing flight paths and location aviation facilities. SDAU can facilitate referral and liaison with relevant stakeholders to gain feedback on aviation safety issues prior to lodgement. This feedback should be responded to within the application. Consideration should also be given to the impacts on agricultural related aviation uses, such as the ability to undertake aerial spraying operations.	Aviation Projects (2024) undertook an Aviation Impact Assessment of the potential aviation impacts associated with the Project. This assessment also provides aviation safety advice in respect of relevant requirements of air safety regulations and procedures and informs and documents consultation with relevant aviation agencies. The Aviation Impact Assessment concludes that aviation activities at Narrogin Aerodrome may limit gliding but would not cause safety risks to aircraft operations. Aircraft operations to private aircraft landing areas (ALAs) located in the vicinity of the Project are still considered to be feasible if the Project is developed. See **Section 7.8** and for more details.

Authority	Comments	Design or Application Response
SDAU **SRCU**	**Transport and access** Undertake a full Transport Impact Assessment in accordance with WAPC's Transport Impact Assessment Guidelines (Western Australian Planning Commission (WAPC), 2016). The TIA will need to be referred to all relevant parties so upgrades and modifications required to the road network can be agreed to. The TIA should include proposed route for transport of the wind turbine components, impacts to road networks, timing and responsibility for road upgrades. The TIA should address the management of project components (e.g. transmission lines) over roads and within rail reserves and provide written consent from MRWA and the PTA. Vegetation removal related to transport route upgrades needs to be covered in environmental referrals. Confirm if the Project's construction will require access through existing but unconstructed road reserves or Crown land. Use of Crown land will require consent from the Crown and this should be included in the Part 11B application. The DA should include a detailed route assessment (as part of a Traffic Impact Assessment) to address disruptions to traffic flow caused by over-size over mass movements, impacts to structures along the routes, traffic impacts from workers accommodation and impacts from transporting materials across railways via existing at grade railway crossings. A Rail Safety Management Plan should also be provided.	Flyt (2024) has undertaken a Transport Assessment in accordance with the WAPC's Transport Impact Assessment Guidelines and contains the relevant information requested by both SDAU and SRCU. It should be noted that the route assessment for the Project has identified a feasible route from Port to the Project, however there may be modifications to the route as the Project proceeds through detailed design. The TIA and required management and mitigations measures will be updated as required following detailed design and it is expected that provision of final documents will be a condition of approval. Secondary approvals via MRWA and PTA will be gained post approval for any proposed works within land administered by these parties. A Rail Safety Management Plan is proposed to be provided post-approval. Engagement with MRWA and the PTA has commenced prior to lodging of this application as per **Section 4.0**. The Project will require access through existing but unconstructed road reserves. These road reserves are currently used for agricultural purposes, and in many cases are used for internal farm access tracks. No turbines are proposed in unconstructed road reserves, however access tracks for the Project are proposed to be constructed along these reserves. Construction of access tracks will not prevent use of these road reserves as public roads in future if required. Minor vegetation removal required for the transport development envelope has been addressed as part of the Part IV EPA referral.
SDAU **SRCU**	**Environment** The Project should be referred under the *Environment Protection Act 1986* and *Environment Protection and Biodiversity Conservation Act 1999* based on the vegetation clearance area provided. WAPC cannot make a decision on the Part 11B application until the Public Environmental Review Process is complete and any Ministerial Statement has been issued. Recommends that the environmental review is undertaken first, to reduce risk of requiring modifications that may trigger a second referral or consultation process.	Referrals under the WA EP Act and Commonwealth EPBC Act have been submitted. The EPA, DWER, and DCCEEW have been consulted with throughout planning of the Project as described in **Section 4.0**. Flora and fauna surveys have been completed as described in the EPA and EPBC referral documents and as summarised in **Section 7.1**.

Authority	Comments	Design or Application Response
	A targeted survey should be undertaken for threatened species and ecological communities under the *Biodiversity and Conservation Act 2016.*	
SDAU	**Visual impact assessment** Undertake a detailed Landscape and Visual Impact Assessment (LVIA) based on the WAPC's *Visual Landscape Planning in Western Australia Manual.*	LatStudios (2024) undertook a LVIA based on the current Project design. The methodology for the assessment considers the guidelines by WAPC in addition to other accepted guidelines for assessment of wind farm projects and landscape sensitivity from Australia and overseas. The LVIA has detailed the existing landscape character and key viewpoints, the potential visual impacts at key viewpoints, and considered mitigations where possible. Further information is contained in **Section 7.4**.
SDAU	**Aboriginal heritage** SDAU have identified three Aboriginal sites that are within the development site. In the application, confirm the development area and how it impacts any of the identified site**s.** If any ground-disturbing activities are proposed within the boundary of the identified sites, approval is required under the *Aboriginal Heritage Act 1972.*	No ground disturbance is proposed within the boundary of identified Registered sites. Archae-Aus undertook an Aboriginal Heritage Due Diligence Assessment for the Project, and Neoen is engaging with Traditional Owners on survey requirements for the Project. Further details are provided in **Section 7.6**.
SDAU **SRCU**	**Decommissioning** Information on the matters relating to decommissioning for the development should be provided with a development application. The details should include the timing and actions to restore the land to its previous condition and any additional rehabilitation. Typically, a detailed decommissioning and rehabilitation management plan would be provided post-determination, if an approval was to be issued.	The Project is expected to have an economic life of approximately 25-30 years. Landowner agreements made provision for an initial lease term of 30 years, with an additional term of 30 year. At the end of the current lease term, a decision would be made by the operator to decommission the wind farm permanently or replace the turbines with upgraded models. A summary of decommissioning is provided in **Section 3.8**.
SDAU	**Workforce accommodation** If this is proposed, provide full details and address the matters within the WAPC's Position Statement: Workforce Accommodation.	A discussion on proposed workforce accommodation is provided in **Section 3.6.4**. The approach to provide future details on workforce accommodation was discussed with DPLH on 24 October 2024 and no issues raised with this approach.

Authority	Comments	Design or Application Response
SDAU **SCRU**	**Bushfire risk** The application should address how the proposal aligns with the objectives of *State Planning Policy 3.7: Planning in Bushfire Prone Areas.* Prior to lodgement, the Department of Fire and Emergency Services should be consulted about the proposal and a Bushfire Hazard Assessment undertaken. Suitable access to water, access and egress are required for safe operations of the facility.	Bushfire Prone Planning (2024)have completed a Bushfire Management Plan (BMP) for the Project. This included an assessment against *State Planning Policy 3.7 v1.0*, *Guidelines for Planning in Bushfire Prone Areas v1.4*, and the *Guidelines and Model Requirements – Renewable Energy Facilities v4* (Victorian Country Fire Authority August 2023) which is considered 'best practice' by DFES Land Use Planning. The BMP concludes that all Elements of the Bushfire Protection Criteria can be met by using the required 'acceptable' solutions. Further details are provided in **Section 7.9**.
SRCU	**Surface Water** The DA should address the impact of encroachment into the floodplain, including flood modelling. The DA should include a Surface Water Management Plan, to address potential risk to water and soil erosion.	WGA (2024) undertook a Pre-Development Condition Flood Study to inform the design and mitigate potential flood impacts. The substation, BESS and Western Power terminal are located outside of the 0.5% annual exceedance probability (AEP) flood extent. Access tracks will utilise existing creek crossings where possible, however some of these may need to be upgraded, typically via installation of culverts or a floodway. The Preliminary CEMP (see **Section 3.6.5**) contains measures to address potential soil erosion and water impacts during construction. These measures will be reviewed and updated as part of the detailed design of the Project. Further details are provided in **Section 7.2**.
SRCU	**Water Supply** The DA should include a detailed water report, which addresses the supply of drinking water and onsite wastewater disposal associated with the workforce accommodation and ancillary buildings.	Water Corporation have indicated that a water supply can be provided from the mains pipeline that traverses the southern end of the Project Site. Based on the proposal from Water Corporation this supply is expected to be potable. Details related to water and effluent disposal will be determined as part of the detailed design process.
SCRU	**Biosecurity** Address potential risk to biosecurity associated with construction and operations of the facility. A Biosecurity Management Plan should be prepared as part of the Environmental Management Plan.	A small number of existing weeds were identified within the Flora Assessment. All species of weed are common pasture weeds and classified as 'exempt' under the *Biosecurity and Agriculture Management Act 2007* such that there is no permit or condition related to these. Biosecurity management measures will be included in the CEMP and then revised as the Project begins operations. The Preliminary CEMP contains biosecurity management measures and will be updated prior to construction.

Authority	Comments	Design or Application Response
SDAU	**Other requirements** Include the updated technical studies (Phase 2) which responds to the proposed final development layout. Provide a location plan showing the cadastral lot boundaries, townsite boundaries, and boundaries of each LGA. Provide a site plan showing the development layout, cadastral lot boundaries and LGA boundaries. Recommend inclusion of map enlargements to show the distance between turbines and lot boundaries.	The updated technical studies have been appended to this DA and supporting figures provided.
SDAU	**Community consultation** Consider undertaking preliminary community engagement in accordance with the Departments 'Guide to Best Practice Planning Engagement in WA' prior to lodgement.	Early engagement with the community and key stakeholders has been undertaken by Neoen. The details of the engagement methods, dates and feedback received are summarised in **Section 4.0**.

6.0 Planning Assessment

6.1 State

This section describes how the Project aligns with relevant aspects of the State planning framework.

6.1.1 State Planning Strategy 2050

The *Western Australian State Planning Strategy for 2050* (WAPC, 2021) and how it has been considered by the Project is outlined in **Table 6.1**.

Table 6.1 Project Alignment with the WA State Planning Strategy 2050

What is it?	Alignment of the Project
The *State Planning Strategy 2050* (the Strategy) is the lead strategic planning document within the state and provides the strategic context for future strategies, plans, policies and decisions related to sustainable use development of land throughout WA. The Strategy identifies that WA has abundant renewable energy sources which are important to the State's efforts to mitigate and adapt to the effects of climate change. Further additions to the renewable energy market, including transmission and distribution infrastructure, are encouraged to meet the growing demand for energy. The renewable energy sector is also recognised as being key part of the State's knowledge economy and an opportunity to both attract and upskill the labour market and increase economic diversification in regional areas.	The *State Planning Strategy 2050* makes specific reference for a need to improve the State's electricity network infrastructure to manage the increased generation and use of renewable energy. The Project is consistent with and supports the implementation of the goals and strategic directions of the *State Planning Strategy 2050*. The construction and operation of the Project will also meet the Strategy's goal to provide further jobs and support the economy of regional areas.

6.1.2 Energy Transformation Strategy

The *Western Australian Energy Transformation Strategy* (Energy Policy WA, 2021)and how it has been considered by the Project is outlined in **Table 6.2**

Table 6.2 Project Alignment with the WA Energy Transformation Strategy

What is it?	Alignment of the Project
The State's *Energy Transformation Strategy* sets out the State government's work program for delivering secure, reliable, sustainable, and affordable electricity for WA. The Strategy includes five objectives: • Maintain a secure and reliable electricity supply. • Ensure affordable electricity for households and businesses. • Reduce energy sector emissions. • Transition affected workers in the Collie region. • Promote local jobs and growth.	The Project is strongly aligned with, and directly advances, at least three of the five strategy objectives: • Maintain a secure and reliable electricity supply. • Ensure affordable electricity for households and businesses. • Reduce energy sector emissions. The Project will also provide opportunities for workers in the Narrogin and Williams region, in particular during construction of the Project.

6.1.3 Western Australian Climate Policy

The Western Australian Climate Policy (Department of Water and Environmental Regulation (DWER), 2020) and how it has been considered by the Project is outlined in **Table 6.3**.

Table 6.3 Project Alignment with the WA Climate Policy

What is it?	Alignment of the Project
The *Western Australian Climate Policy* was released in 2020 (DWER, 2020), and sets out the vision for a climate resilient state with net-zero greenhouse gas emissions by 2050. The policy lays out the following areas of focus for climate action in the State: • Clean manufacturing and future industries. • Transforming energy generation and use. • Storing carbon and caring for our landscapes. • Lower-carbon transport. • Resilient cities and regions. • Government leadership.	As a renewable energy Project, the Project is directly aligned with a number of these focal areas. Importantly, the Project can progress relatively quickly as there is an existing transmission connection within the Project Site with capacity to connect, and Neoen has been awarded critical project status with Western Power to enable a timely connection.

6.1.4 State Planning Policy No. 1 – State Planning Framework

The Project has considered *State Planning Policy No. 1* (SPP1) (Department of Planning Lands and Heritage (DPLH), 2017), in particular in relation to hierarchy of provisions and elements related to inconsistencies of the Project with the Shire of Narrogin *Local Planning Policy (LPP) D11 – Wind Farms* and Shire of Williams *LPP1 Wind Farms*. Alignment of the Project with relevant provisions in SPP1 is described in **Table 6.4.**

Table 6.4 Consideration of State Planning Policy No. 1

Relevant aspects	Alignment of the Project
State Planning Policy No. 1 (SPP1) restates and expands upon the key principles of the State Planning Strategy in planning for sustainable land use and development. It brings together existing State and regional policies, strategies, and guidelines within a central State Planning Framework (Framework) which provides a context for decision-making on land use and development in Western Australia. The Framework informs the Commission, local government and others involved in the planning process on State level planning policy which is to be taken into consideration, and given effect to, in order to ensure integrated decision-making across all spheres of planning. General principles in SPP1 for land use planning and development are described relating to: Community, Economy, Environment, Infrastructure, Regional Development, and Governance.	The Project is well aligned with several of the general principles of SPP1, including: **Community** - *providing effective systems of community consultation at appropriate stages in the planning and development process*. • Neoen have completed a rigorous community engagement and considered the views of the community through the Project development (as per **Section 4.0**). **Economy** - *protecting agricultural land resources from inappropriate uses*; and *avoiding land use conflicts by separating sensitive and incompatible uses from industry and other economic activities with off-site impacts*; • Implementation of the Project allows ongoing agriculture on the Project Site and adjoining properties. As per **Section 6.4**, Neoen is seeking discretion from the WAPC to determine that potential future sensitive and incompatible land uses on adjoining properties should not prevent approval of a Project which is in the public interest.

Relevant aspects	Alignment of the Project
	Regional development - *facilitate strong and resilient regional communities and regions by promoting a diverse range of land uses and developing regional resources through economic diversification* • The Project diversifies the economy of the region, with a significant investment that is compatible with existing agricultural activities. The Project is also consistent with a range of other general principles of SPP1 related to the environment and infrastructure.

6.1.5 State Planning Policy No. 2 – Environment and Natural Resources Policy

State Planning Policy No. 2 (SPP2) (WAPC, 2003) and how it has been considered by the Project is described in **Table 6.5.**

Table 6.5 Consideration of State Planning Policy No. 2

Relevant aspects	Alignment of the Project
State Planning Policy No. 2 (SPP2) defines the principles and considerations that represent good and responsible planning in terms of environment and natural resource issues within the framework of the State Planning Strategy. The objectives of the policy are to: • Integrate environment and natural resource management with broader land use planning and decision-making. • Protect, conserve and enhance the natural environment. • Promote and assist in the wise and sustainable use and management of natural resources. SPP2 refers to reducing greenhouse gas emissions by decreasing reliance on non-renewable fuels, stating that '*planning strategies, schemes and decision making should support the use of alternative energy generation, including renewable energy, where appropriate*.' SPP2 also includes measures related to the protection of the environment (biophysical and social), mitigation of impacts, and management of water resources, soil and land quality, biodiversity, and landscape values.	The Project is well aligned to the objectives of SPP2 relating to energy and renewable energy capacity. Further, the Project site selection and design has considered the objectives and measures in SPP2 by: • Selecting predominantly cleared land for the purposes of constructing and operating the facility and ancillary infrastructure to minimise any proposed clearing as much as possible. • Undertaking flora and fauna surveys in accordance with relevant EPA guidelines to inform understanding of potential impacts and suitable controls (see **Section 7.1**). • Completing a hydrology study to understand potential flooding risk and ensure suitable controls have been implemented (see **Section 7.2**). • Completing noise modelling throughout the project design and a Noise Impact Assessment for the Indicative Project Layout to understand and mitigate potential noise impacts to nearby receptors (see **Section 7.3**). • An LVIA has been completed and used as part of the Project design to mitigate impacts (see **Section 7.4**). • Consulting with the EPA and DCCEEW on the Project activities to understand any associated regulatory or referral requirements, and referring the Project to both agencies to determine whether formal assessment is required.

6.1.6 State Planning Policy No. 2.5 – Rural Planning

State Planning Policy No. 2.5 (SPP2.5) (Department of Planning (DoP), 2016) and how it has been considered by the Project is described in **Table 6.6.**

Table 6.6 Consideration of State Planning Policy 2.5

Relevant aspects	Alignment of the Project
State Planning Policy 2.5 (SPP 2.5) provides the overarching planning objectives relating to rural zones defined in local planning schemes. SPP 2.5 aims to protect rural land, rural land uses, avoid land use conflicts, and support sustainable economic growth. The policy seeks to promote economic development opportunities, with the Western Australian Planning Commission (WAPC) to balance the need for economic opportunity with the protection of the State's primary production and natural resource assets. Relevant objectives of SPP2.5 include: • Protect agricultural land resources wherever possible. • Minimise the potential for land use conflict. • Carefully manage natural resources. Relevant policy measures of SPP 2.5 include retaining land identified as priority agricultural land for that purpose and retaining and protecting rural land for biodiversity protection, natural resource management, and protection of valued landscapes and views.	The proposed Project is consistent with the intent of SPP2.5. There will be minimal disturbance to the existing rural and agricultural use of the Project Site or the surrounding landholdings. The Project will disturb approximately 3% of the total Project Site during construction. The proposed Project site has not been identified as priority agricultural land and the intended land use could be considered as incidental or complimentary to rural land uses. Neoen have worked closely with the landholders to design the layout of the Project in a way that ensures the ability to continue their existing agricultural practices both during construction and operations. The Project will not materially impact the use of surrounding land for rural purposes now or into the future. The project has setbacks from property boundaries that exceed those recommended by AEIC (Australian Energy Infrastructure Commissioner (AEIC), 2022) and referred to by SDAU as part of pre-lodgement engagement. The Aviation Impact Assessment completed for the Project has concluded that aircraft operations at private airstrips used for aerial crop spraying located in the vicinity of the Project are still considered to be feasible if the Project is developed (see **Section 7.8**). The LVIA completed for the Project has identified that there will not be a significant impact to landscape values or significant visual impacts, apart from motorists along Narrogin-Williams Road (see **Section 7.4**). The Project retains and protects the biodiversity value and natural landscape of the site by utilising cleared land while preserving patches of remnant vegetation as far as possible (see **Section 7.1**). The Project does not require the abstraction of surface water or groundwater and will not adversely impact water resources in the Project Site or surrounds (see **Section 7.2**).

6.1.7 State Planning Policy No. 2.9 – Water Resources

State Planning Policy No. 2.9 (SPP2.9) (WAPC, 2006) and how it has been considered by the Project is described in **Table 6.6.**

Table 6.7 Consideration of State Planning Policy 2.9

Relevant aspects	Alignment of the Project
The objectives of SPP2.9 are to: • protect, conserve and enhance water resources that are identified as having significant economic, social, cultural and/or environmental values • assist in ensuring the availability of suitable water resources to maintain essential requirements for human and all other biological life with attention to maintaining or improving the quality and quantity of water resources • promote and assist in the management and sustainable use of water resources. A draft revision of SPP2.9 was released in August 2021 and contains an updated set of policy provisions. The intent of the updated policy provisions is to ensure that planning/development considers water resource management at the appropriate time.	In the case of the proposed Project, there are limited surface water and groundwater resources on the site. An initial constraints assessment for the Project identified potential water sensitive values and these have been considered as part of the Project design. The Project is not within a proclaimed groundwater area, there are no licensed groundwater bores in the nearby vicinity. The Project does not propose to access surface water from watercourses in the Project Site. A hydrology study has been completed to understand potential flooding risk and ensure suitable controls have been implemented (see **Section 7.2**).

6.1.8 State Planning Policy No. 3.7 – Planning in Bushfire Prone Areas

State Planning Policy No. 3.7 (SPP3.7) (WAPC, 2015) and how it has been considered by the Project is outlined in **Table 6.8.**

Table 6.8 Project Alignment with State Planning Policy 3.7

Relevant aspects	Alignment of the Project
SPP3.7 applies to all land which has been designated as bushfire prone and all development applications on those lands. Proposed developments in Bushfire Prone Areas must have a Bushfire Management Plan undertaken by an accredited professional which includes a Bushfire Attack Level (BAL) assessment, identification of any bushfire hazard issues, and compliance with criteria outlined in policy guidelines.	Bushfire Prone Planning (2024) have completed a Bushfire Management Plan (BMP) for the Project. This included an assessment against *State Planning Policy 3.7 v1.0*, *Guidelines for Planning in Bushfire Prone Areas v1.4*, and the *Guidelines and Model Requirements – Renewable Energy Facilities v4* (Victorian Country Fire Authority August 2023) which is considered 'best practice' by DFES Land Use Planning. The BMP concludes that all Elements of the Bushfire Protection Criteria can be met by using the required 'acceptable' solutions. Further details are provided in **Section 7.9**.

6.1.9 Position Statement – Renewable Energy Facilities

The Western Australia *Position Statement for Renewable Energy Facilities* (WAPC, 2020) was prepared to support the consistent consideration of renewable energy facilities in WA. It sets out the policy position of the WAPC with respect to renewable energy project development. A number of aspects are outlined in the position statement, and all of these have been considered and addressed throughout the design of the Project. **Table 6.9** outlines how these have been considered, with reference to further detail in other sections of this report.

Table 6.9 Consideration of the WA Position Statement – Renewable Energy Facilities

What is it?	Alignment of the Project
This position statement aims to support appropriate development of renewable energy facilities by encouraging consideration and assessment of renewable energy developments using a standardised framework. In particular, it: • Describes the provisions that should be made in state and local planning instruments (local planning schemes, policies, and strategies etc.) to guide decision making regarding renewable energy facilities. • Lists the factors that should be considered during assessments of proposed facilities, including community consultation, environmental impact, visual and landscape impact, public and aviation safety, heritage, and construction impacts. • Seeks to maximise energy production and operational efficiency, and minimise potential impacts to the environment, natural landscape, and urban areas.	This position statement has been considered in the design, location, and management of the Project as follows: • **Community consultation** - Early community and stakeholder engagement has been undertaken throughout the Project to inform the design. This includes engagement with local Shires, relevant Government agencies, landowners, the broader community, special interest groups and service providers, and traditional owners. Details are provided in **Section 4.0**. • **Environmental Impact** – biodiversity surveys have been completed in accordance with EPA guidelines, and in consultation with the EPA and DCCEEW. Outcomes of surveys have informed the Project design and mitigations, with avoidance of impacts being the primary mitigation measure. Referrals have been prepared and submitted to the EPA and DCCEEW. Further details are provided in **Section 7.1** • **Visual and Landscape Impact** – A LVIA has been completed, including a comprehensive analysis of landscape character and potential viewpoints with the potential to be impacted by the Project. The LVIA concluded that the only potentially significant impact is to motorist views along Williams-Narrogin Rd. Further details are provided in **Section 7.4**. • **Noise Impact** – Noise modelling has been completed for multiple Project design iterations, background noise monitoring has been completed, and a Noise Impact Assessment prepared to support this application. Outcomes of modelling have been used to adjust the Project design such that Noise Regulations can be met at existing noise sensitive receivers. The setback from existing noise sensitive receivers is greater than the minimum 1,500 m recommended in the Position Statement. Further details are provided in **Section 7.3**. • **Aviation Safety** – An Aviation Impact Assessment completed for the Project has concluded that aviation safety risks related to the Project are acceptable. Further details are provided in **Section 7.8**. • **Bushfire Risk** - The BMP by Bushfire Prone Planning concludes that all Elements of the Bushfire Protection Criteria can be met using acceptable solutions. Further details are provided in **Section 7.9**. • **Heritage** – an Aboriginal and Historic Due Diligence Assessment has been completed for the Project by Archae Aus. No registered Aboriginal sites will be impacted by the Project, and Traditional Owners are being consulted on next steps to consider potential survey requirements. No historic heritage sites will be directly impacted by the Project. Further details are provided in **Section 7.6** and **Section 7.7**. • **Construction Impact** – A Preliminary CEMP has been provided as part of this application (**Appendix C**). The Preliminary CEMP will be updated and finalised prior to construction. In addition, a preliminary Bird and Bat Adaptive Management Plan (BBAMP) has been prepared (**Appendix E**).

6.1.10 Visual Landscape Planning in Western Australia

The Visual Landscape Planning in Western Australia Manual (WAPC, 2007)and how it has been considered by the Project is outlined in **Table 6.10.**

Table 6.10 Consideration of Visual Landscape Planning in WA Manual

Relevant aspects	Alignment of the Project
The Visual Landscape Planning in Western Australia – A Manual for Evaluation, Assessment, Siting and Design (the VLP Manual) is the primary guiding document which details a consistent approach to the consideration of visual landscape matters within the planning process.	The Project has responded to the Manual by undertaking a comprehensive LVIA, led by LatStudios. Further details are provided in **Section 7.4**.

6.2 Regional

This section describes aspects of the regional planning framework relevant to the Project.

6.2.1 Wheatbelt Region Planning and Infrastructure Framework 2015

The Wheatbelt region is the agricultural heartland of WA, providing much of the State's grain supply. The area comprises 43 LGA's and over 100 settlements and covers approximately 155,000 square kilometres of area to the north and east of Perth. The Wheatbelt Region Planning and Infrastructure Framework (the Framework) identifies the regional planning issues and provides a basis for ongoing planning and development in the region, setting the priorities that can be reflected in the Regional and Local Planning Schemes.

The framework has three key objectives:

1. Creation of liveable of communities through the provision of effective infrastructure and service delivery.
2. Creation of a diverse and adaptive economy that has an increased contribution to the State's economy and enables diversification through growth of new and innovative industries.
3. Valuing natural amenity by having environmental and landscape values that support the social, cultural and economic development of the region, and are managed for current and future generations.

Renewable energy is recognised within the Framework as being an opportunity for development in the region given the climatic and geographic conditions, and the Framework aims to support the development of the energy sector to meet the needs of the State and region.

The Project aligns with the key objectives of the Framework, as it will provide a vital renewable energy resource for the SWIS and thousands of homes and businesses within the Wheatbelt region. The Project will support the economic development of the region by providing up to approximately 250 roles during the 33-month construction period and approximately 10–15 full time roles during operations which will increase economic activity within the region. Neoen will prioritise the employment of staff from within the local area, with additional workers likely to be required from further afield.

Further, the environmental and landscape impact assessments undertaken have demonstrated that the Project will not have significant adverse impacts on the environmental or landscape values during all stages of the Project's life cycle.

6.3 Local

This section describes aspects of the local planning framework relevant to the Project.

6.3.1 Shire of Narrogin

6.3.1.1 Shire of Narrogin Local Planning Strategy

The Shire of Narrogin Local Planning Strategy (NLPS) sets out the long-term planning directions for the Shire, applies relevant State and regional planning policies that are relevant to the Shire and provides the rationale for zoning and classification of land under the local planning scheme.

The NLPS identifies key values, assigns an overarching objective and lists various strategies and actions for how the planning scheme will respond.

Relevant objectives and the Project's response to these are detailed in **Table 6.11** below.

Table 6.11 Project Alignment with the Local Planning Strategy

Objectives	Alignment of Project
Agriculture To protect and achieve ecological sustainable use of all productive agricultural land in the Shire whilst providing diverse and compatible development opportunities in agricultural areas which promote the local economy.	The development of the Project provides for a complementary and compatible development on land which is currently being used for grazing and cropping. The Project's infrastructure will utilise only a small proportion of the productive land (approx. 3% construction footprint) and will be located in such a way that it will take advantage of existing infrastructure (access, water supply and transmission lines). Through the Project, Neoen will be supporting the local economy through the investment in energy infrastructure, community benefit fund, additional jobs for locals and spending in the area.
Commerce and Industry Development of a diversified range of commerce and industry in appropriate locations which provides significant employment opportunities, reduces the local economy's dependency upon the agricultural sector and minimises the potential for future land use conflicts.	See comment above.
Drainage To ensure that all development in the Shire is served by adequate, high quality and reliable stormwater drainage infrastructure that improves the quality of stormwater runoff and avoids salinity encroachment, flood risk and negative impacts on local drainage conditions and natural resources.	A Flood Assessment has been undertaken, which has determined that the substation, BESS and Western Power terminal would be outside of the 0.5% annual exceedance probability (AEP) flood extent. Access tracks will utilise existing creek crossings where possible, however some of these may need to be upgraded, typically via installation of culverts or a floodway.

Objectives	Alignment of Project
Promote a coordinated approach to agricultural drainage in the Shire. Ensure that flood risk is managed to an acceptable level of flood protection for the health and safety of people, damage to property and community infrastructure.	Any dewatering of groundwater will be localised and temporary; likely to only be required for installation of culverts at creek crossings. As part of the detailed design the flood assessment will ensure the development will not increase the downstream flood risk and risk to those on neighbouring properties.
Power & Energy To ensure that all future development in the Shire is energy efficient and served by a reliable, affordable and sustainable power supply.	The Project provides an alternative and renewable power supply which will serve not only the Shire of Narrogin but the wider State.
Environment Identify, protect, conserve and enhance the environmental values and natural resources of the Shire for the benefit of current and future generations while providing appropriate development opportunities to promote the local economy.	The development of the Project will assist in climate change adaptation of the Shire by providing a renewable, low-carbon source of energy. A number of surveys have been undertaken to understand and mitigate the Project's impact on environmental values. Further details in relation to environmental impacts are discussed in **Section 7.1**.
Bushfire Implement effective, risk based land use planning and development to preserve life and reduce the impact of bushfire on property and infrastructure.	Bushfire Prone Planning (2024) have completed a Bushfire Management Plan (see **Section 7.9**).
Visual Landscape Protection Protect, conserve and enhance landscapes in the Shire with high scenic qualities for the benefit of current and future generations and encourage development which is sensitive to local landscape character and quality.	A LVIA has been completed, including a comprehensive analysis of landscape character and potential viewpoints with the potential to be impacted by the Project. The LVIA concluded that the only potentially significant impact is to motorist views along Williams-Narrogin Rd. Further details are provided in **Section 7.4**.
Buffer Areas To ensure that all buffer areas in the Shire are clearly defined, secured and managed to protect industry, infrastructure and special uses from the encroachment of incompatible land uses and provide for the safety and amenity of land uses surrounding industry, infrastructure and special uses.	The Project design has been amended to remove wind turbines which may interfere with the use of other land uses, such as the Narrogin Airport and nearby residences. The Project is not able to meet all of the recommended setbacks in Local Planning Policy D11. However, setbacks have been applied based on industry best practice, AEIC guidelines and evidence from studies completed for the Project.
Aboriginal Heritage To understand, appreciate and protect all areas of Aboriginal heritage significance in the Shire and ensure the timely resolution of native title issues to maximize opportunities for future development and growth.	No ground disturbance is proposed within the boundary of identified Registered sites. Archae-Aus undertook an Aboriginal Heritage Due Diligence Assessment for the Project, and Neoen is engaging with Traditional Owners on survey requirements for the Project. Further details are provided in **Section 7.6**.
European Heritage To ensure that all areas of cultural heritage significance in the Shire are identified and insofar as reasonably possible protected when considering proposals for land use change and development.	An Aboriginal and Historic Due Diligence Assessment has been completed for the Project by Archae Aus. No historic heritage sites will be directly impacted by the Project. Further details are provided in **Section 7.7**.

6.3.1.2 Shire of Narrogin Local Planning Scheme No. 3

The *Shire of Narrogin Local Planning Scheme No. 3* (LPS No. 3) is the Shire's statutory planning framework which guides land use and development control and sets out the Shire's planning aims.

The alignment of the Project with key relevant aspects of the Scheme is provided in **Table 6.12** and with the objectives of the rural zone in **Table 6.13**.

Table 6.12 *Shire of Narrogin Local Planning Scheme No. 3*

Description	Alignment of the Project
The LPS No. 3 classifies land zones and the permissibility of land uses within each zone. It also provides objectives for the Scheme and different zones, describes general development requirements, and outlines requirements for planning approval (among other things).	**Land Use Classification** The Project falls under the "renewable energy facility" classification as defined by Part 6, Division 2 of the LPS No. 3. **Scheme Zone** The Project Site falls within land zoned as Rural under LPS No. 3. **Land Use Permissibility** In accordance with Table 3: Zoning Table of the LPS No. 3, renewable energy land uses are not permitted within the Rural zone unless development approval is granted by the Shire after advertisement of the application in accordance with clause 64 of the deemed provisions (Schedule 2 of the Planning and Development (Local Planning Schemes) Regulations 2015 (WA)).

Table 6.13 Alignment with Rural Zone objectives of the *Shire of Narrogin LPS No. 3*

Scheme aim	Alignment of the Project
To provide for the maintenance or enhancement of specific local rural character.	A LVIA has been completed, including a comprehensive analysis of landscape character and potential viewpoints with the potential to be impacted by the Project. While wind farms by their nature and location are large and distinctive features, the LVIA concluded that that impacts on the landscape character will not be significant, even if the turbines are visible. The only potentially significant visual impact is to motorist views along Williams-Narrogin Rd. See **Section 7.4** for further details.
To protect broad acre agricultural activities such as cropping and grazing and intensive uses such as horticulture as primary uses, with other rural pursuits and rural industries as secondary uses in circumstances where they demonstrate compatibility with the primary use.	There will be minimal disturbance to the existing rural and agricultural use of the Project Site or the surrounding landholdings. Refer to ***Table 6.6 Consideration of State Planning Policy 2.5*** for further details.

Scheme aim	Alignment of the Project
To maintain and enhance the environmental qualities of the landscape, vegetation, soils and water bodies, to protect sensitive areas especially the natural valley and watercourse systems from damage.	A range of environmental studies have been completed to identify qualities to be maintained and protected. Refer to previous sections on consideration of SPP2, SPP2.9, and **Section 7.1** and **Section 7.2** for further details.
To provide for the operation and development of existing, future and potential rural land uses by limiting the introduction of sensitive land uses in the Rural zone.	The Project is not a sensitive land use. However, there are risks to the feasibility of the Project (which is in the public interest) from sensitive land uses proposed immediately adjacent to the Project Site.
To provide for a range of non-rural land uses where they have demonstrated benefit and are compatible with surrounding rural uses	The Project: • Has demonstrated benefits, as described in **Section 1.3**. • Is compatible with the existing agricultural use of the Project Site and surrounding properties, as described in this document.

6.3.1.3 Shire of Narrogin Local Planning Policy – Wind Farm/Turbines

The Shire of Narrogin has a Local Planning Policy D11 (LPP D11) which provides guidelines for the development and operation of wind farms in the local government area. The LPP D11 has been considered and several aspects have been discussed with the Shire of Narrogin, primarily around setback requirements.

An assessment of how the Project has considered elements of the LPP D11 is outlined in **Table 6.14**.

Table 6.14 Project Alignment with Local Planning Policy D11

Policy Aspect	Alignment of the Project
General Requirements	This document includes a location plan, indicative project layout, "worst case" turbine specifications, site plan and elevations. The wind farm and turbines are sited and designed to minimise adverse impacts on the environment, based on best industry standards. The Project does not meet the requirements for the property boundary setback (3 times the total height of the structure). Meeting this setback would result in a wind farm that is not viable to develop. A discussion on setbacks that have been adopted for the Project is provided in the response to the SDAU Planning Assessment in **Section 5.0** and discretion being sought in **Section 6.4.1**. Decommissioning of the Project is described at a high-level in **Section 3.8** and a Preliminary Decommissioning Plan is provided in **Appendix A** demonstrating principles of recycling, repurposing and rehabilitation.
Community and Stakeholder Consultation	Neoen has undertaken various engagement activities with the community and key stakeholders prior to lodgement of this application. Further detail is contained in **Section 4.0** and the CSEP (**Appendix D**).
Community Enhancement Fund	The community benefit fund for the Project is described in **Section 1.3.2**.

Policy Aspect	Alignment of the Project
Environmental Impact	Surveys in accordance with industry guidelines have been completed to identify flora, vegetation, fauna habitat and bird and bat utilisation over the Project Site and surrounds. Survey results have been used to assess the potential impacts of the Project on these environmental values and to develop appropriate mitigations. A summary of biodiversity surveys and environmental outcomes is provided in **Section 7.1** and the comprehensive environmental impact assessment as submitted to the WA EPA for the Project is provided in **Appendix F**.
Visual and Landscape Impact	The LVIA prepared by LatStudios (2024) includes all information required by the policy, including reference to the WAPC Visual Landscape Planning Manual (see **Section 7.4**).
Noise Impact	As per the Renewable Energy Position Statement(WAPC, 2020), Neoen has completed detailed noise modelling and considered both the WA Environmental Protection (Noise) Regulations 1997 and the SA *Wind farms environmental noise guidelines 2021*. Setbacks from adjoining sensitive land uses are based on meeting compliance according to these documents. The Noise Impact Assessment has been completed by a suitably qualified acoustic consultant, experienced in assessing wind farm noise. Neoen has sought to discuss noise agreements with adjacent landowners, however these landowners have declined to engage with Neoen and hence noise agreements were unable to be established. The minimum distance from a turbine to an existing non-involved noise sensitive premised is 1.6 km. Noise modelling indicates that the Project will be compliant with the night-time noise criteria of 35 dB at all existing noise sensitive premises. Should the Project be required to meet the 2 km setback, the Project would be severely restricted and would not be viable in this location. Neoen have been using a criteria of 45 dB for involved dwellings in the absence of WA based criteria. However, based on the Noise Impact Assessment, the recommended noise limit of 40 dB can be achieved at all involved dwellings that will be occupied while the Project is under operation. See **Section 7.3** for further details
Safe Work Zone	Neoen and contractors will always prepare safe work method statements but would not typically provide these as part of a planning approvals process. Setback distances from turbines are conservative and provide for the ongoing safe use of adjoining land.
Bushfire	A BMP has been prepared in accordance with SPP 3.7. See **Section 7.9** for further detail.
Other Potential Impacts	DNV (2024) have undertaken an Electromagnetic Interference (EMI) Assessment, which included consultation with organisations that operate services that may be affected by the Project. The assessment concluded that most services are unlikely to be impacted by the Project and should there be interference with point-to-area style services then a range of options are available to rectify difficulties. See **Section 7.9** for further details. A Shadow Flicker Assessment has been completed for the Project. The assessment indicates that shadow flicker impacts are not predicted to occur at existing non-involved receivers. See **Section 7.11** for further details. An Aviation Impact Assessment has been completed, including consultation with relevant agencies and airport operators (see **Section 7.8**). The Aviation Impact Assessment concluded that: • It is anticipated that the Project would not cause safety impacts for aircraft operations at the aerodrome, although there may be an inconvenience to gliding operations by limiting gliding activity in the immediate vicinity of the Project Site.

Policy Aspect	Alignment of the Project
	• The Project will not affect future certification of the Narrogin Aerodrome. • Aircraft operations for aerial crop spraying via private landing strips located in the vicinity of the Project are still considered to be feasible if the Project is developed. • The 100 m setback distance from a turbine to a property boundary specified by the Aerial Application Association of Australia (AAAA) has been exceeded, with a distance of at least 325 m between the nearest turbine and a non-involved property boundary. Further details on mitigations of impacts identified in the LPP are provided in **Section 7.8**.
Road contributions	Neoen will undertake the road improvements required to bring the oversize overmass loads to site. Neoen will also undertake a dilapidation survey prior to construction and then again post construction, making good any deterioration that has resulted from construction activities.

6.3.2 Shire of Williams

6.3.2.1 Shire of Williams Town Planning Scheme No. 2

The *Shire of Williams Town Planning Scheme No. 2* (TPS No. 2) and how it has been considered by the Project is outlined in **Table 6.15**.

Table 6.15 Project Alignment with the *Shire of Williams Town Planning Scheme No. 2*

Description	Alignment of the Project
The TPS No. 2 classifies land zoning across the Shire of Williams and the permissibility of land uses within each zone. It also provides objectives for the overall Scheme and zones, describes general development requirements, and outlines requirements for planning approval (among other things).	**Land Use Classification** The Project falls under the "renewable energy facility" classification as defined by Schedule 1 of TPS No. 2. **Scheme Zone** The Project site falls within land zoned as Rural under TPS No. 2. **Land Use Permissibility** The land use classification for "renewable energy facility" is not listed in the Table 1 Zoning Table of TPS No. 2. Therefore, it is likely to be considered as a land use not listed.

6.3.2.2 Shire of Williams Local Planning Policy No. 1 – Wind Farms (Renewable Energy Facilities)

The Shire of Williams developed their *Local Planning Policy No. 1* (LPP1) in 2023 to provide relevant planning considerations against which a wind farm development application can be assessed. How the Project has addressed LPP1 is outlined in **Table 6.16**.

Table 6.16 Project Alignment with the Shire of Williams Local Planning Policy No. 1

Policy Aspect	Alignment of the Project
Community and Stakeholder Consultation	Neoen has undertaken various engagement activities with community and stakeholder groups prior to lodgement of this application. Further detail is contained in **Section 4.0** and the CSEP is provided in **Appendix D**.
Environmental Impact	Surveys in accordance with industry guidelines have been completed to identify flora, vegetation, fauna habitat and bird and bat utilisation over the Project Site and surrounds. Survey results have been used to assess the potential impacts of the Project on these environmental values and relevant mitigations. A summary of biodiversity surveys and environmental outcomes is provided in **Section 7.1** and the environmental referral supporting document for the Project is provided in **Appendix F**.
Visual and Landscape Impact	An LVIA has been prepared which meets the requirements of the policy. The Project however does not meet the setback requirements to neighbouring lot boundaries (800 m). Instead, Neoen has designed the Project to minimise and mitigate impacts on landscape, character and scenic amenity and landscape values to the greatest extent possible through careful siting of the windfarm infrastructure. This includes a setback of over 7 km from the Town of Williams and 4 km from the nearest Rural Residential zoned land. The LVIA prepared by LatStudios (2024) includes all information required by the policy, including reference to the WAPC Visual Landscape Planning Manual (see **Section 7.4**).
Noise Impact	A Noise Impact Assessment has been completed by a suitably qualified acoustic consultant, experienced in assessing wind farm noise. See **Section 7.3** for further details An operational noise management plan will be developed that identifies how compliance with the Project's operational noise limits will be demonstrated, including details of testing procedures and reporting time frames following commencing of operation of the Project. Following construction, compliance monitoring will be conducted in accordance with the procedure outlined in the operational noise management plan including sound power testing of selected turbines and evaluation of tonality.
Other Potential Impacts	A Shadow Flicker Assessment (DNV, 2024) has been undertaken, which has found that shadow flicker effects will be limited to those dwellings which are within the Project Site. With regard to ongoing agricultural activities, the Aviation Impact Assessment concludes that aerial crop spraying on neighbouring properties is feasible, and the nearest setback of a wind turbine to the property boundary of 325 m exceeds the 100 m setback within the National Windfarm Operating Protocol guidance of the Aerial Application Association of Australia. Further details are provided in **Section 7.0**.
Traffic Management and the Protection of Roads and Other Public Infrastructure	The requirements to complete a pre-development condition report and for the developer to bare any costs associated with damage to roads and any upgrades required for the construction of the Project are noted.
Decommissioning Program	Neoen has provided a Preliminary Decommissioning Plan (**Appendix A**), which will be a live document and updated periodically through the life of the wind farm. Neoen will consider any updates to legislation, guideline and other regulations when refreshing the plan. Any major changes to the Decommissioning Plan will be discussed with the relevant regulatory agencies and stakeholders.

6.3.2.3 Shire of Williams Strategic Community Plan

The Shire of Williams Strategic Community Plan is a 10-year strategic plan, which identifies long term community aspirations, visions and objectives which helps the Shire to allocate appropriate resources to achieve these aspirations.

While there are no policies within this Plan that specifically relate to renewable energy developments, one outcome has been identified that the Project responds to as outlined in **Table 6.17**.

Table 6.17 Alignment of Shire of Williams Strategic Community Plan

Policy Aspect	Alignment of the Project
E1.5 Encourage business and community groups' initiatives to promote the Shire as a place to live, work, play and invest	The Project would support the local economy by providing up to 250 jobs during construction and 10-15 ongoing jobs during the Projects operational phase. Neoen is committed to sourcing these roles locally where possible, encouraging employees to live and invest in the area. Neoen has also committed to providing an annual community benefit fund which will fund local community projects.

6.4 Section 171R Extraordinary Discretion

Under Clause 171R of the Planning and Development Act 2005, the WAPC may determine a significant development application under 171P in a manner that conflicts with the provisions of the applicable planning instrument. The Commission must be of the opinion that:

> *(i) the application raises issues of State or regional importance, and*
>
> *(ii) the determination is in the public interest.*
>
> *or*
>
> *(i) if the applicable planning instrument is a local planning scheme; and*
>
> *(ii) in the opinion of the Commission, the conflict is of a minor nature; and*
>
> *(iii) in the opinion of the Commission, the determination is consistent with the general intent of each State planning policy, planning code, region planning scheme and local planning strategy that is relevant to the development.*

Neoen requests Extraordinary Discretion to be granted by the WAPC to consider and approve the development application of the Project. In making this request, Neoen submits:

- The Project is of State and regional importance, by contributing to achieving key goals and objectives outlined by the State government in the *Energy Transformation Strategy* (Energy Policy WA, 2021), by helping to maintain a secure and reliable energy supply, ensure affordable energy, and reduce emissions through increasing renewable energy supply at a local and regional level.
- The Project is in the public interest, by demonstrating a clear benefit to the community over and above mandatory legislated requirements, mitigating effects of climate change and providing jobs and diversification of the regional economy.

- Advice from SDAU during the pre-lodgement process was that the discretion sought is considered a 'minor variance' to the planning framework in relation to not meeting setback requirements as per the Shire of Narrogin LPP D11 and Shire of Williams LPP1.
- As described as part of the Planning Assessment in the above sections, the Project is well aligned with the State Planning Framework, including the *State Planning Strategy for 2050* (WAPC, 2021), relevant State Planning Policies (SPP1, SPP2, SPP2.5, SPP2.9 and SPP3.7) and the *Renewable Energy Position Statement* (WAPC, 2020).

Further details in support of this request are provided in the sections below in relation to (i) setbacks specified in the Shire of Narrogin LPP D11 and Shire of Williams LPP1, and (ii) consideration of future development on adjoining properties.

6.4.1 Setback Requirements

Variance is sought for setback distances outlined in the Shire of Williams and Shire of Narrogin Local Planning Policy's as per **Table 6.18**.

Table 6.18 Setback Requirements

Requirement	Project Design
Shire of Williams Local Planning Policy No.1 – Wind Farms (LPP1)	
Minimum 800 m setback between any wind turbine and a neighbouring lot boundary, unless otherwise agreed to in writing by affected property owner.	The closest turbine is located 325 m from the neighbouring lot boundary.
Shire of Narrogin Local Planning Policy D11 Wind Farm/Turbines (LPP D11)	
Minimum setback from property boundary of three times total height of the structure at highest point, or 500 m, whichever is greater. In this case the setback would be 873 m for a 291 m turbine height.	The closest turbine is located 325 m from the neighbouring lot boundary.
Minimum setback of 2 km from any dwelling or sensitive land use, or 10 times the height of the structure, whichever is greater, unless a written agreement is entered into with impacted landowners. In this case, the setback requirement would be 2.91 km for a 291 m turbine height.	The closest turbine is 1.6 km from the nearest existing non-involved sensitive receiver.

Verbal advice from SDAU as part of pre-lodgement engagement was that the setbacks proposed by the Project is considered a 'minor variance' to the planning framework, however has recommend that a comprehensive rationale for considering an appropriate setback is provided within the application. The rationale for the setback proposed as part of the Project is provided in the following sections.

6.4.2 Inconsistency with the Position Statement and Impact on Project Viability

Neoen has been actively engaging with the Shire of Narrogin on the Project since September 2022. In November 2023 the Shire of Narrogin released draft Local Planning Policy D11 (LPP D11) for public comment. The final LPP D11 was adopted in March 2024, with revised setback distances to wind turbines which are significantly different to those in the draft LPP D11. The evolution of LLP D11 between the draft and final is shown in **Table 6.19**.

Table 6.19 Comparison of Provisions in the Position Statement, Draft LPP D11, and Final LPP D11

Provision	Position Statement	Draft LPP D11 (November 2023)	Final LPP D11 (March 2024)
Setback to neighbouring boundary	Not defined, however the Position Statement refers to public and aviation safety measures.	The minimum recommended setback from property boundaries shall be a minimum of the total height of the structure including, the propellor blades at the highest point, plus additional 20 m.	The minimum recommended setback from property boundaries shall be a minimum of 3 times the total height of the structure including, the propellor blades at the highest point or 500 m, whichever is greater.
Noise	The minimum recommended distance between noise-sensitive land uses and a wind turbine is 1,500 metres.	Noise Impact Assessments shall be conducted to determine potential impacts on nearby residents and any sensitive land use, and mitigation measures shall be implemented as necessary to demonstrate that it can meet the standards under the Environmental Protection (Noise) Regulations 2017. It is recommended that any wind farm/turbine be located a minimum of 1.5 km from any dwelling or sensitive land use, unless an agreement is entered into with impacted landowners.	Regardless of the noise impact assessment, which may determine turbines should be located further away from noise sensitive premises, it is required that any wind farm/turbine be located a minimum of 2.0 km or 10 times the height of the structure, at its highest point inclusive of the blade, whichever is the greater, from any dwelling or sensitive land use, unless a written agreement is entered into with impacted landowners prior to construction of the structure and a notification to that effect is imposed on the title of that lot or location.

Neoen provided a submission on the draft LPP D11 based on significant experience developing wind farm projects in Australia, however Neoen were not provided the opportunity to comment on the LPP D11 prior to it being adopted. Provisions that were adopted in LPP D11 were unexpected, with significant changes to the draft LPP D11.

A wind farm project takes between 2 and 5 years to develop and considerable cost. These are large and complex infrastructure projects which require detailed planning, analysis, design and environmental studies and surveys. Neoen has been designing and developing the Project in consideration of requirements of the Position Statement, the *Best Practice Guidelines for Implementation of Wind Energy Projects in Australia* (Clean Energy Council, 2018), consultation with key stakeholders on the Project, and drawing on significant experience developing wind projects in other States. The provisions in the adopted LPP D11 in March 2024, which are significantly greater than the provisions in the Position Statement (a higher-order planning instrument) and the draft LPP that was advertised for comment in November 2023 would render the Project economically unviable and would likely preclude many other wind farm developments in the Shire of Narrogin. The developable area for the Project considering the requirements of the final LPP D11 is shown in **Figure 6.1** below, illustrating the impact that the provisions of LPP D11 have on the viability of the Project.

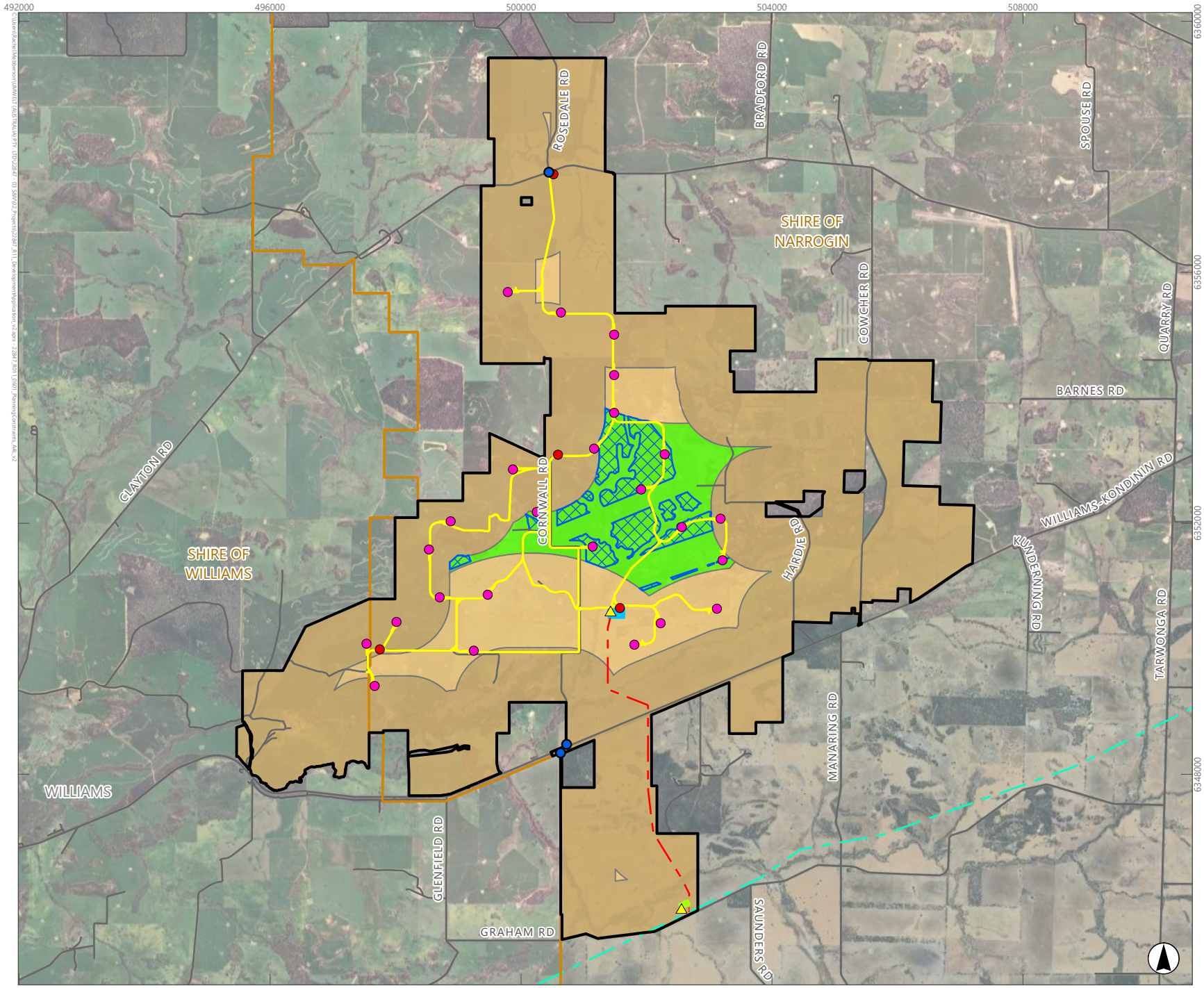


FIGURE 6.1

Proposed Turbine Layout Overlaid on Setback Areas from LPP D11

Legend

- Project Site
- Local Government Area Boundary
- Road
- Existing 220kV Transmission Line

Indicative Project Layout

- Turbine
- Firewater Tank
- Site Entry
- Communications Tower
- BESS, Substation and O&M Compound
- Western Power Terminal
- Overhead Transmission Connection
- Internal Roads and Underground Cabling (Permanent)

Planning Controls

- Available Area
- 873 m buffer of Project Site
- 2.91 km buffer from uninvolved sensitive receptors
- Buildable Area

0 1.6 3.2

Kilometres

Scale 1:83,733 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), WP (2023)

Setbacks specified in the final LPP D11 relate to noise impacts to adjoining properties, maintaining a safe work zone in case of major breakdown of turbines, and the ability for adjoining landholders to continue to undertake aerial crop spraying. Commentary on each of these aspects is provided below.

Noise impact on adjoining properties

The LPP D11 is inconsistent with the Position Statement Renewable Energy Facilities (WAPC, 2020) (the Position Statement), which sets the policy position of the WAPC with regards to renewable energy project development. The Position Statement requires a 1.5 km setback for noise impacts to noise sensitive land-uses, citing evidence from the National Health and Medical Research Council (2020) that there are unlikely to be any significant effects on physical or mental health at distances of more than 1.5 km. The Position Statement also refers to meeting the standards prescribed under the Environmental Protection (Noise) Regulations 1997, while the South Australian Environmental Protection Authority – Wind Farms Environmental Noise Guidelines (Environmental Protection Authority South Australia (EPASA), 2021) should also be referenced for assessment purposes.

In considering the modelled noise impacts, the MDA Noise Impact Assessment has determined that the 35 dB(A) night-time noise limit can be met at all but one non-involved sensitive land use surrounding the Project Site. At that location, the exceedance is by only 0.4 dB(A) during certain wind speeds, and the 35 dB(A) can be met by operating the nearest tower in a sound optimised mode at these times of high wind speeds. The Project design has sought to balance the feasible location of wind turbines on the Project Site with the intent of the Position Statement, which is to minimise adverse noise impacts on non-involved sensitive land uses. It is considered that at the current locations, the Project is able to achieve this outcome, and as such the 2.91 km setback requirement by the LPP D11 is excessive for the purposes of managing noise impacts. Further, the setback calculation is not based on any evidence of industry best practice.

The Australian Energy Infrastructure Commissioner (AEIC) notes that current setback distances for noise impacts are largely based on legacy turbine dimensions and expected outcomes from noise standards. The standard setback of 1.5 km for older model turbines was considered to be sufficient to meet a 35 dB(A) noise limit. The Commissioner also notes that the improvements in turbine design in recent years have mitigated the noise effects and as such, setbacks for these purposes could be reduced.

Risk of major turbine breakdown

The Australian Energy Infrastructure (2022)considers a number of issues regarding setback distances for wind farm projects to 'dwellings', i.e. noise, visual impact and safety. While the AEIC is not prescriptive on setback distances from wind turbines to boundary fences it notes "*a default setback distance from roads and boundary fences in the order of 200 metres to allow for a safety margin in the event of a blade drop or throw*".

Ability to continue aerial crop spraying

The design has also considered the implications of wind turbines on aerial crop sprayers. The proposed set-back from the boundary of 325 m is greater than the 100 m that is the minimum recommended by the Aerial Application Association of Australia (AAAA) in their National Windfarm Operating Protocols (Aerial Agricultural Association of Australia (AAAA), 2014). An aviation impact assessment was completed and concluded that the wind farm would not prevent aerial sprayers from operating in the neighbouring lots. The presence of wind turbines does introduce a new hazard, but the risks can be managed through consultation between the wind farm operator and the aerial sprayer to formally assess the risk and implement appropriate safety measures.

6.4.3 Inconsistencies with other jurisdictions or agencies

There are 111 wind farms operating in Australia, of which 86% by number or 93% by MW capacity are installed in the National Electricity Market, primarily South Australia, Victoria, New South Wales and Queensland (*Open Electricity*, 2024). A review of the respective state planning requirements for wind farm projects has not revealed a requirement for an arbitrary setback from a neighbouring lot boundary.

New South Wales

On 12 November 2024 the NSW Department of Planning, Housing and Infrastructure released the NSW Wind Energy Guideline (2024), which introduces *"clear setback and visual impact criteria".* In this regard there is no concept of setback distances to neighbouring lot boundaries. The guidelines provide the following:

- Visual: 1.5 km from sensitive receivers, including dwellings for a 240 m turbine.
- Noise: 35 d(B)A at sensitive dwellings, unless an agreement is in place with the landowner. This means that landholders may enter into an agreement with applicants to accept noise levels above the prescribed noise limits. Where such an agreement is in place, these receivers do not require an assessment of noise impacts.

Queensland

The Queensland government has published guidelines for wind farm project development – State code 23: Wind farm development of the State Development Assessment Provisions (State Development Assessment Provisions (SDAP), 2024). This guideline does not consider the concept of setback distances to neighbouring lot boundaries. The guidelines provide the following for a project to be code assessable and thereby not be subject to impact assessment:

- all wind turbines for the wind farm are at least 1,500 m from a sensitive land use on a non-involved lot; or
- one or more wind turbines for the wind farm is less than 1500 m from a sensitive land use on a non-involved lot and the owner of the non-involved lot has, by deed, agreed to the turbines being less than 1,500 m from the sensitive land use.

Should turbines be within 1,500 m of a sensitive land use on a non-involved lot, an impact assessment is to be completed to demonstrate that relevant acoustic criteria for non-involved and involved noise sensitive premises can be met.

Victoria

The Victorian government has published guidelines for wind farm project development – Planning Guidelines for Development of Wind Energy Facilities (Department of Transport and Planning (DTP), 2023). This guideline does not consider the concept of setback distances to neighbouring lot boundaries. The guidelines provide the following:

- A wind turbine cannot be within 1 km of an existing dwelling unless that dwelling forms part of a proposed wind energy facility. Should there be an existing dwelling within 1 km of a proposed turbine, the permit application must be accompanied by evidence of the written consent of the dwelling owner.

In addition, a planning permit is required for buildings or works associated with accommodation, including a dwelling located within one kilometre from the nearest title boundary of land subject to:

- a permit for a wind energy facility or
- an application for a permit for a wind energy facility.

South Australia

The South Australian government has published new legislation for wind farm project development – *Hydrogen and Renewable Energy Act 2023*. Setbacks, as set out in the Planning and Design Code (the Code) under the *Planning, Development and Infrastructure Act 2016* (SA) (PDI Act), are not prescribed under the Act or Criteria as each project will be assessed on a case-by-case basis based on the potential impacts a project poses to the given environment in that area.

The Act previously considered a set back at least 1,500 m from the base of the turbine to non-involved (non-stakeholder) dwellings and tourist accommodation.

6.4.4 Consideration of Future Development on Adjoining Properties

Both the Shire of Narrogin LPP D11 and Shire of Williams LPP1 contain requirements to consider future sensitive land uses which may be constructed in the locality and comply with the Noise Regulations at these neighbouring sites. Notwithstanding the 'minor variance' to setback distances described in Section 2.1 the Project has been designed to meet all legislative requirements, particularly for noise and visual impact for all *existing* sensitive receivers – i.e. dwellings, and consideration has been given to future uses where reasonably possible.

The design of the Project has been modified to remove several turbines which would reduce the extent of the 35 dB(A) noise contour where lots do not have an existing dwelling and front a road as defined in the Western Australian Road Hierarchy (MRWA, 2024) (noting that the NLPS requires any development on lots that do not front a constructed road to seek development approval). The Project Site has also been reduced to consider setbacks from Rural Residential zoned lots in the Shire of Williams as these have a higher potential to be developed with noise sensitive land uses in the future. This has reduced visual and landscape impacts to the town of Williams and surrounding rural residential areas.

The Project has also been modified so that entire properties (that comprise multiple lots) under a single landholding are not significantly noise affected. This aims to minimise the impact on the ability of adjoining landowners to construct additional dwellings or other noise-sensitive land uses. Further information is provided in **Section 7.3**.

Neoen considers that it is unreasonable and the commercial risk too great, to expect a wind farm operator to modify the operating parameters of an approved or constructed asset to meet the noise regulations at a future and unanticipated land use.

Neoen was made aware in September 2024 that two development applications (the DAs) had been approved for the construction of two dwellings on a lot to the west of the Project Site. These were submitted and approved after the Project was announced and early details of turbine locations made available to key stakeholders. The predicted noise levels at these proposed dwellings would be between 40 and 45 db(A), requiring curtailment of the wind farm outside the day period as defined in the Noise Regulations at high wind speeds.

It is considered that the DAs are an attempt to impede the approval of the Project rather than a legitimate desire to construct a new dwelling in this area based on the interactions between the landowner and Neoen to date. The appropriateness of the location of these dwellings is questioned, given both dwellings have been sited as close as possible to the Project Site on the proprietor's overall landholding and on the lots, are far removed from any utilities, and would require the construction of an access road to both dwellings.

The location of the two approved dwellings and the proprietors landholdings in the context of the Project Site, proposed turbine locations, and modelled 35 dB, 40 db and 45 dB noise contours is provided in **Figure 6.2**.

Draft Operational Policy 1.13 - Significant Development Pathway - Public Interest Considerations (Policy 1.13) (DPLH, 2024) provides principles and criteria for making determinations in the public interest. The principles and criteria in Policy 1.13 have been developed based on several case law examples (Appendix 2 of Policy 1.13), including cases from other States in Australia. Two additional relevant examples after the release of Policy 1.13 which may provide guidance on a public interest consideration include:

- The Hills of Gold Wind Farm in NSW:
    - The Hills of Gold Wind Farm was approved by the NSW Independent Planning Commission (IPC) in September 2024 (Independent Planning Commission (IPC), 2024).
    - Approval of the Hills of Gold Wind Farm was delayed for several years due to a "phantom" dwelling (i.e. a vexatious approval to attempt a project from progressing).
    - A key aspect of the IPC determination was that visual and noise impacts could not be avoided at the location of the dwelling (approved, not constructed), and the provision of an acquisition clause in the conditions would provide appropriate mitigation while allowing the project to proceed.
- The NSW Department of Planning, Housing and Infrastructure (DPHI) Wind Energy Guideline released in November 2024 (Department of Planning, Housing and Infrastructure (DPHI), 2024):
    - Section 6, under "development rights" provides guidance on assessing impacts to vacant land, that is land where there is a development right that has not been acted upon and is vacant of buildings and structures. In considering whether the proposed development (i.e. wind farm) would unduly impact the development potential of vacant land, it may be relevant to consider:
        - whether the vacant land is part of a broader contiguous property holding with an existing dwelling, building or structures
        - if a future development could be designed, sited and oriented to avoid or reduce significant impact from the project
        - any mitigating effects including topography and vegetation.
    - If the vacant land is subject to a development application that has been determined/granted but the development is yet to be physically commenced, the applicant should consider measures to mitigate impacts on these rights, which may include:

- helping affected landholders modify the existing consent
- seeking a new development consent that would minimise impacts, or
- screening or landscaping treatments.

  - The DPHI Wind Energy Guideline states that these approvals should not be treated as existing dwellings, or other receivers for the purpose of conducting a visual impact assessment or noise impact assessment.

As noted previously, the Project has also been modified to minimise restricting the ability of adjoining landowners to construct additional dwellings or other noise-sensitive land uses. Specifically in relation to the two approved dwelling DA's:

- Neoen has been attempting to engage with the proprietor of the property on which the proposed dwellings are located since 2022.
- The proprietor of the lots has a significant continuous landholding in the area, with many lots that are likely more appropriately located with regards to constructed road access.
- No building permit has been applied for to construct the dwellings, despite development approval being granted over 12 months ago.
- Neoen is continuing to attempt to engage with the proprietor on potential noise impacts and is investigating options to further reduce noise impacts through Project design.

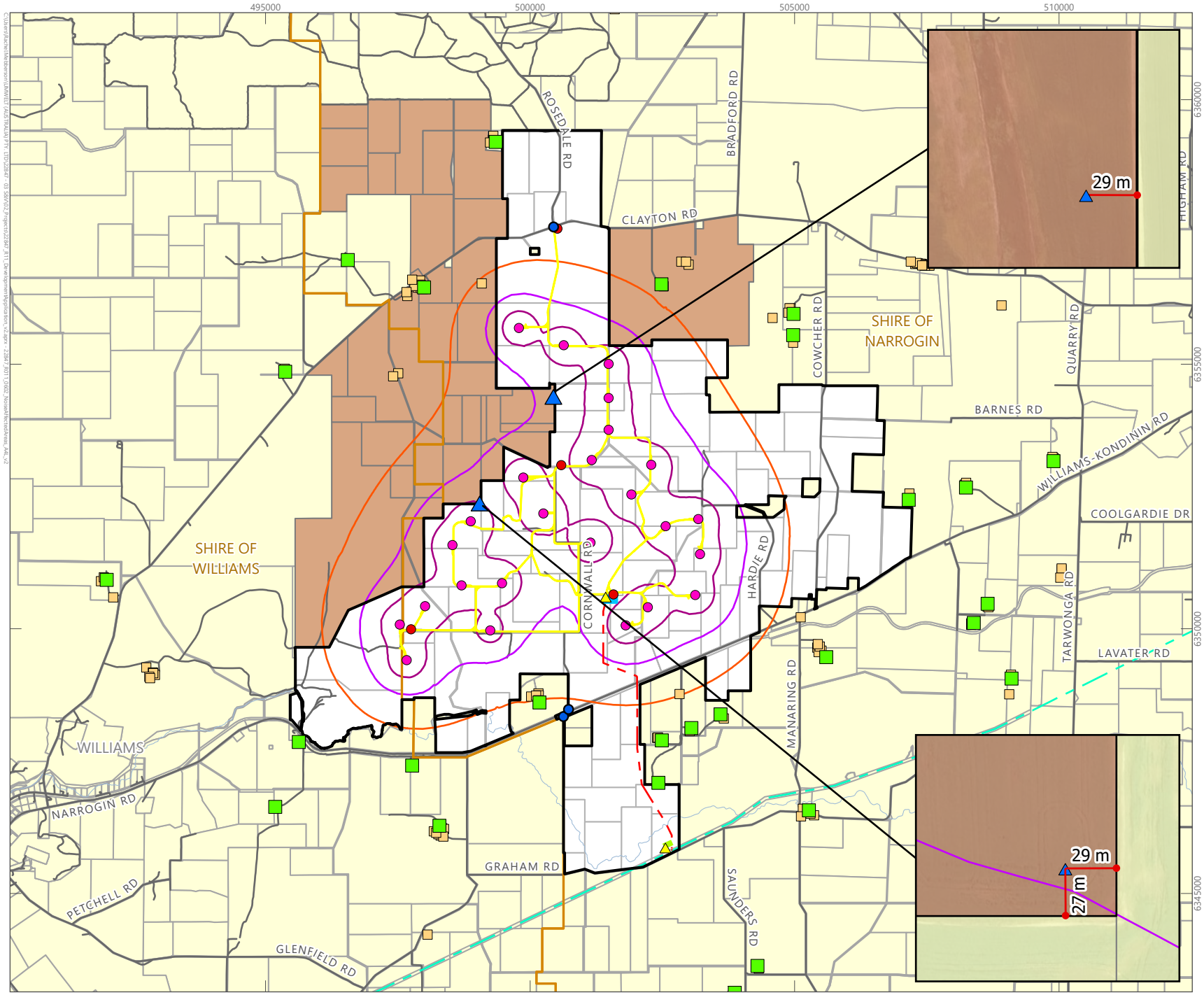
The WAPC considerations under Clause 171R are not limited to noise effects at these future potential land uses, and should also consider wider social, economic and climate change benefits of the Project which support State, regional, and local strategies and broader aligned with the State Planning Framework, as discussed in this document. These include:

- provision of renewable energy that meets the increased demand for electricity in the State
- reduction of greenhouse gas emissions through energy production and adaptation to climate change
- provision of jobs and investment in rural communities, including the provision of the community benefit fund
- diversification of the local rural economy, whilst maintaining the ability to continue existing agricultural uses.

The above benefits provided by the Project are strongly aligned with multiple provisions of the Planning Framework as described in the above **Sections 6.1** to **Section 6.3**.

On the basis of the above, it is considered that these two dwellings with approved DAs should be discounted in the context of amenity effects on the future land uses.

FIGURE 6.2
Noise Affected Areas on Adjoining Properties



Legend

- Project Site
- Local Government Area Boundary
- Road
- Existing 220kV Transmission Line
- Major Watercourse
- Landowner of Lots with Approved Dwellings
- Approved Dwellings
- Non-involved House
- Non-involved Shed

Noise Contours

- 35db
- 40db
- 45db

Indicative Project Layout

- Turbine
- Firewater Tank
- Site Entry
- Communications Tower
- Overhead Transmission Connection
- BESS, Substation and O&M Compound
- Western Power Terminal
- Internal Roads and Underground Cabling (Permanent)
- Primary Road

0 2 4

Kilometres

Scale 1:100,000 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), WP (2023)

6.5 Other Legislation and Regulations

This section discusses other legislative or regulatory documents which may have relevance to planning considerations for the Project, including those at a Commonwealth level.

6.5.1 State

Environmental Protection Act 1986 (WA) – Part IV

The *Environmental Protection Act 1986* (EP Act) was established to protect and improve environmental quality, control and reduce pollution as well as to conserve, preserve, protect, enhance and manage the environment.

Part IV of the EP Act requires that projects likely to have a significant effect on the environment are referred to the EPA to assess whether an environmental impact assessment is required. The Environmental Protection Authority (EPA) administers Part IV of the EP Act, and uses environmental principles, factors and associated objectives as the basis for assessing whether a proposal or land use planning scheme's impact on the environment is acceptable.

The WA EPA has been engaged on the Project a number of times since mid-2023. Umwelt has prepared and submitted an Environmental Referral Supporting Document (ERSD) on behalf of Neoen under Part IV of the EP Act, in consideration of engagement with the EPA to date. The ERSD identified three environmental factors as being relevant to the proposal, being 'flora and vegetation', 'terrestrial fauna' and 'social surrounds'. The ERSD concludes that the impacts of the proposal are able to be managed through the adoption of the mitigation hierarchy and implementation of best practice management measures to ensure that there are no significant residual impact on these factors.

The ERSD for the Project was submitted to the EPA on 31 October 2024 and a copy is provided in **Appendix F**.

Environmental Protection Act 1986 (WA) – Part V

Part V of the EP Act regulates emissions and discharges to the environment through a works approval and licensing process and regulates the clearing of native vegetation through clearing permit applications. Premises with the potential to cause emissions and discharges to air, land, or water are known as 'prescribed premises' and require works approvals for construction, and a licence or registration for ongoing emissions and discharges.

Neoen will apply for a Native Vegetation Clearing Permit under Division 2, Part V of the EP Act for any native vegetation clearing that is required and that is not exempt from requiring a permit.

Depending on the capacity of the concrete batching plant and whether a temporary accommodation camp is required on site, a Works Approval and License may be required under Division 1, Part V of the EP Act. Neoen will consult further with Department of Water and Environmental Regulation (DWER) on Part V EP Act requirements as the design progresses.

Environmental Protection (Noise) Regulations 1997 (WA)

The Environmental Protection (Noise) Regulations 1997 (Noise Regulations) provide the criteria for assessing allowable noise emissions, including from wind turbines. Regulation 8 of the EP Noise Regulations sets out the maximum allowable noise levels (assigned noise levels) based on the time of day and land use receiving the noise.

The Project has been designed to comply with the Noise Regulations at all existing non-involved sensitive receivers.

Further information on the Noise Impact Assessment completed for the Project is provide in **Section 7.3**.

Biodiversity Conservation Act 2016 (WA)

The *Biodiversity Conservation Act 2016* (BC Act) provides for conservation and protection of biodiversity, including threatened species, threatened ecological communities and habitats in Western Australia.

Assessments have been undertaken to assess the presence of, and potential impacts to, flora, fauna and vegetation on the site which includes identification of species of conservation significance which are covered by the BC Act. The results of these assessments are discussed in **Section 7.1**.

Biosecurity and Agricultural Management Act 2007 (WA)

The Biosecurity and Agricultural Management Act 2007 (BAM Act) was introduced to provide for the management of the risk of animal, plant pests and diseases entering, emerging, establishing or spreading throughout Western Australia.

The Project will implement a biosecurity management plan as part of the overall Environmental Management Plan for the site, which will include standard measures to prevent any plant pests, animals and diseases from spreading through any equipment, vehicles and materials which may be brought onto the Project site.

Rights in Irrigation and Water Act 1914 (WA)

The RIWI Act establishes a licensing system for taking water from a watercourse or underground source, constructing or altering wells, and interfering with the bed or banks of a watercourse. DWER is responsible for administering the RIWI Act.

The Project Site is encompassed within the Murray River System which is a Proclaimed Surface Water Area (DWER, 2022b). The DWER Kwinana-Peel region was consulted in March 2024 on the requirements for a bed and banks permit for any interference with the bed and bank of the watercourse. Officers at DWER advised that a single permit could be lodged for all watercourse crossings in the Project Site.

The Project Site is not located within any Proclaimed Groundwater Area (DWER, 2022a).

Construction water for the Project will be sourced from the Water Corporation pipeline.

Aboriginal Heritage Act 1972 (WA)

The *Aboriginal Heritage Act 1972* (AHA) is the current legislation governing the protection of Aboriginal cultural heritage in the State.

Under the AHA it is an offence to alter an Aboriginal site in any way, including collecting artefacts; conceal a site or artefact; or excavate, destroy or damage in any way an Aboriginal site or artefact; without the authorisation of the Registrar of Aboriginal Sites under Section 16 or the Minister of Aboriginal Affairs under Section 18 of the AHA. Aboriginal sites can be any site of importance where Aboriginal persons have left objects connected with traditional cultural life, sacred or ceremonial sites, or places which the Committee consider to be associated with Aboriginal people and are of historical, anthropological, archaeological or ethnographic significance.

An Aboriginal Heritage Due Diligence Assessment has been undertaken by Archaeu-Aus (2024). No identified Registered Aboriginal sites will be disturbed by the Project.

Further information is provided in **Section 7.6**.

6.5.2 Commonwealth

Environment Protection and Biodiversity Conservation Act 1999 (Cth)

The Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) is the main piece of national environmental legislation, and provides a framework for management of flora, fauna, habitats and places that are considered to be nationally and internationally significant (known as Matters of National Environmental Significance or MNES). The EPBC Act is administered by the Department of Climate Change, Energy, the Environment and Water (DCCEEW).

Where an activity (development) is deemed to have or is likely to have an impact on any MNES, the activity must be referred to DCCEEW to determine whether the activities proposed are a Controlled Action, and require further assessment.

Following the completion of the Phase 2 technical assessments, it was determined that the Project could potentially impact on five threatened fauna species through the removal of vegetation which is suitable habitat for these species. One Threatened Ecological Community (TEC) was identified on the Project site however impacts to this are largely avoided through project design. A referral under the EPBC Act was submitted on 26 September 2024.

Renewable Energy (Electricity) Act 2000

The *Renewable Energy Electricity Act 2000* (Renewable Energy Act) was established to promote and accelerate the development of renewable energy resources and encourage additional electricity generation from renewable energy sources to assist in reducing the nations greenhouse gas emissions from the sector. The Mandatory Renewable Energy Target Scheme (MRET) is a critical component of the Act and requires electricity wholesalers to source a portion of the electricity sold from renewable energy sources.

The Project addresses the Renewable Energy Act given it provides a new renewable energy resource for the SWIS and will contribute towards achievement of the targets set out in the MRET.

7.0 Summary of Technical Studies

7.1 Biodiversity

Biodiversity surveys and assessments have been undertaken by Umwelt and Western Wildlife to determine the baseline environment and inform avoidance and mitigation of potential impacts.

An ERSD has been prepared and submitted to the WA EPA (**Appendix F**) under Part IV of the *Environmental Protection Act 1986*, and the Project has also been referred to the Commonwealth DCCEEW under the *Environment Protection and Biodiversity Conservation Act 1999.*

Flora and vegetation surveys were undertaken from 1-3 May 2023, 26-29 September 2023, 4-6 November 2023 and 19 April 2024 in accordance with *Technical Guidance—Flora and Vegetation Surveys for Environmental Impact Assessment* (Environmental Protection Authority (EPA), 2016). Prior to surveys, an initial desktop was completed to identify potential flora and vegetation values present (including ecological communities). Surveys were then completed ground-truth and provide a summary of the flora and vegetation values present as well as to define the likelihood of occurrence for any conservation significant flora and vegetation returned from desktop search results.

Terrestrial fauna surveys were undertaken from 1–3 May 2023, 23–27 October 2023, and 10–11 June 2024, and dedicated Bird and Bat Utilisation Surveys (BBUS) were undertaken from 23–28 October 2023 and 5–9 February 2024. These surveys were completed in accordance with *Technical Guidance—Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment* (2020), while for black-cockatoo species the DCCEEW *Referral Guideline for 3 WA Threatened Black Cockatoo Species* (Department of Agriculture, Water and the Environment (DAWE), 2022) and Bamford (2020) methods for mapping and characterising foraging and breeding habitat was used. Fauna surveys were conducted within representative locations of all fauna habitat types.

Biodiversity surveys were also completed for an area referred to as the “Additional Survey Area”. The Additional Survey Area refers to the early conceptual layout of the Project and the original much larger study area boundary which surrounded it. The Additional Survey Area is not part of the Project Site.

Further details on the survey methodology and findings is provided in the ERD in **Appendix F**, and a summary is provided below:

- Flora and vegetation:
    - The Study Area was predominantly mapped as “cleared” land with occasional isolated (remnant native and exotic) trees over pasture weeds (5,098.9 ha, or 80.4% of the Study Area) (see **Appendix F**).
    - Remnant vegetation ranged from Good to Degraded, with the majority assessed as being in Degraded condition.
    - A total of 23 vegetation types were mapped across the Study Area, with the majority being highly modified since European settlement precluding them from being considered intact remnant vegetation.

- A total of 47 conservation significant flora taxa were predicted to occur within the Study Area based on desktop search results with none of these recorded during surveys.
- No listed Threatened or Priority flora under Commonwealth or State legislation (i.e. conservation significant) were recorded within the Study Area during field surveys.
- One Priority Ecological Community (PEC) was identified during surveys which is the *Eucalypt Woodlands of the Western Australian Wheatbelt* (listed as Priority 3 in WA and as Threatened [Critically Endangered] by the Commonwealth).

- Terrestrial fauna:
  - A total of 248 fauna species consisting of amphibians, reptiles, birds, and mammals were predicted to occur within the Study Area based on desktop search results with a total of 103 being recorded during surveys (1 amphibian, 4 reptiles, 83 birds, and 15 mammals). A total of 23 fauna species predicted to occur are considered to be of conservation significance, and 6 were recorded during field surveys.
  - Field surveys within the Project Site recorded 111 fauna species, comprising 90 birds, 17 mammals (including 8 bats), 3 reptiles and 1 amphibian.
  - Seven listed fauna species were recorded within the Project Site during the fauna survey program, including Carnaby's Black-Cockatoo, Forest Red-tailed Black-Cockatoo, Chuditch, Peregrine Falcon, Red-tailed Phascogale, Inland Western Rosella and Western False Pipistrelle,
  - A further four listed fauna species were considered to have a moderate or higher likelihood of occurrence, based on the desktop assessment and the habitats present in the Project Site, including Central Long-eared Bat, Barking Owl (southwest subpop.), Baudin's Black-Cockatoo, Fork-tailed Swift, and Masked Owl (southern subspecies).
  - Black-cockatoo foraging habitat and potential breeding habitat was mapped in the Project Site. Approximately 60% of the Indicative Project Footprint was subjected to the detailed fauna habitat assessment, in which a total of 109 trees met the suitable or potential nest tree criteria of a diameter at breast height (DBH) greater than 500 mm. Of these 109 trees assessed, no trees with active or historical evidence of nesting were found (Rank 1 or 2 trees), five Rank 3 trees containing potentially suitable hollows were identified, and the remaining trees did not have potentially suitable hollows (Rank 4 and 5).
  - A total of 90 bird species were recorded within the Study Area during the field survey program. Of these species, two are listed under both the EPBC Act and BC Act (Carnaby's Black-Cockatoo – Endangered and Forest Red-tailed Black-Cockatoo – Vulnerable).
  - A total of 8 bat species were acoustically recorded by Anabat bat detector devices within the Study Area throughout the field survey program. One of the recorded bat species is listed under the BC Act (Western False Pipistrelle – Priority 4) and none are listed under the EPBC Act.

- A turbine collision risk assessment was completed for Threatened, Migratory and "at-risk" bird and bat species. At-risk species were those birds identified as flying within RSA height during the BBUS and investigated further due to a combination of number of occurrences of observed flights within the RSA height range, total count of individuals observed, and/or their status as a listed Threatened or Migratory species. Black-cockatoo species are conservatively identified as having a "moderate" potential for impacts due to turbine collision. Of all species and groups assessed for their collision risk, only the Microbats group received a High overall risk rating. A total of 12 species received a Moderate overall risk rating as well as the raptors group. The remainder of species (2) received a Minor overall risk rating.

The Project has used the results of the surveys and assessments to mitigate biodiversity impacts as follows:

- All remnants of vegetation in Good condition have been avoided in the Project design.
- The listed flora with a potential to occur was considered only likely to occur in Good or better condition vegetation which has been wholly avoided by the Project. Therefore, the Project is unlikely to have any impacts on conservation significant flora.
- All vegetation patches in the Project Site mapped as PEC have been avoided by the Project and there is unlikely to be any direct or indirect impacts to these patches.
- Clearing in the Project Site will be limited to 7.41 ha of remnant native vegetation (excluding isolated paddock trees) and 0.98 ha of planted native vegetation. Vegetation that is proposed to be cleared comprises the degraded edges of multiple small patches of remnant vegetation, with larger patches with greater habitat value avoided.
- Clearing of approximately 0.2 ha of potential PEC along the transport route will mostly be non-native understorey (weeds) and sheoaks, with clearing of eucalyptus species minimised and the clearing area rehabilitated.
- The Project will avoid Rank 1 (trees with activity at hollow observed) and Rank 2 (trees with hollows of suitable size with chew marks visible) black-cockatoo breeding trees.
- The Additional Survey Area (2,830 ha) has been removed from the Project Site. This allowed avoidance of the largest and most intact remnant habitat patch consisting of Good to Very Good condition native vegetation, with the highest quality fauna habitat.
- Areas with higher foraging value for black-cockatoos have been avoided to reduce likelihood of turbine collision. This includes removing turbines from the Additional Survey Area and from the eastern part of the Project Site where there are larger areas of higher foraging habitat value. This minimises the potential that turbines in this area might reduce utilisation of this foraging habitat by black cockatoos. It also further reduces the already low likelihood of turbine strike risk in this area.
- Areas where direct observations of black-cockatoo individuals were recorded have been avoided by the Project.
- Clearing of black-Cockatoo foraging habitat has been minimised, with a maximum of 5.07 ha of low-quality foraging habitat and 3.32 ha of high-quality habitat proposed to be cleared. These clearing areas are spread over 20 separate fragmented and degraded remnant vegetation patches.

- The number of creek crossings has been minimised. Where crossings are necessary, existing crossings are being utilised so that clearing of riparian vegetation is reduced as far as possible. Where creek crossing upgrades are required, the extent of clearing will be minimised and works will be undertaken in accordance with the associated Bed and Banks permit that will be sought from DWER under the RIWI Act.
- A minimum blade tip height of 49 m AGL has been adopted, which is above the typical flight height for black-cockatoos thereby minimising collision risk.
- A range of mitigation measures will be employed as part of the CEMP to limit and reduce the potential direct and indirect impacts. A Preliminary CEMP is provided in **Appendix C**, and this will be updated prior to construction.
- In addition to undertaking works in accordance with the Project CEMP, a Project Bird and Bat Adaptive Management Plan (BBAMP) will be developed and implemented. Implementation of the BBAMP will mitigate the potential impacts of turbine strike on birds and bats via trigger based, adaptive management. Pre- and post-commissioning monitoring of bird and bat activity (including flight behaviours) is a key requirement of the plan, to inform a risk profile for each turbine. This strategy leads to direct and tailored management actions, applied at the appropriate locations and times. It is expected that finalising and implementing the BBAMP will be a condition of approval.

For further details on the survey methodology and findings, potential impacts, mitigations, and environmental outcomes refer to **Appendix F**.

7.2 Hydrology

A flood modelling study has been completed for the Project (WGA, 2024) a copy of which is provided in **Appendix G**.

The flood study assessed flooding for the existing condition, established and delineated catchments, developed a flood model to determine peak rates and duration for flood events, developed a 2D hydraulic TUFLOW flood model, and assessed the 0.2%, 0.5%, 1% and 5% Annual Exceedance Probability (AEP) design rainfall events. Results were processed to create maximum flood maps to show critical design flood parameters, which were then used to inform the design of turbine locations, access roads, the substation and BESS, the overhead powerline, and other structure associated with the Proposal. Outcomes from the flood study have been used to inform the design of the Proposal to avoid and mitigate hydrological risks and impacts as far as possible.

The Project Site is encompassed within the Murray River System which is a Proclaimed Surface Water Area (DWER, 2022b). It is intersected by the Williams River and Minniging Brook. Other named watercourses intersected by the Project Site include Geeralying Brook (tributary to Williams River) and Mujiting Brook (tributary to Minniging Brook), and several smaller drainage channels (Landgate, 2024).

The Project Site is not located within any Proclaimed Groundwater Area (DWER, 2022a).

Potential impacts as related to surface and groundwater that have been identified and considered as part of the Project design include:

- Flooding impacting on major Project infrastructure.
- Flooding impacts to the access tracks, in particular watercourse crossings.
- Watercourse crossings causing changes to the hydrological regime of the brook, leading to increased flood risk or erosion.
- Impacts to groundwater or surface water quality during construction or operations.

Based on the preliminary design, the substation, BESS and Western Power Terminal are located outside of the 0.5% AEP flood extents. The design therefore complies with Neoen and Western Power's minimum guidelines, which requires that these facilities be located outside of the 1% AEP flood extents. The design of all roads, cable routes and other infrastructure will need to consider the risk of traversing high risk flood areas in their design. While engineered crossings are not necessarily required based on anticipated water levels and flow velocities, two culvert crossings have been proposed to the West and North of the substation to ensure that all-weather access and egress from the main substation and O&M facilities is provided.

A post-development condition flood study will be required to assess the impacts of the proposed design to the surrounding land/infrastructure during the final design stage. The proposed design shall take into account the results of the post-development flood study to ensure that the installation of the facility including hardstands, roads and other non or semi permeable areas do not result in an increased risk of flooding to the surrounding land and infrastructure.

Further measures that will be implemented to mitigate hydrological impacts related to the Project include:

- A bed and banks permit will be required for the creek crossings, and designs for crossings will be based on hydrological modelling that has been completed for the Project along with consultation with DWER.
- The removal of vegetation will be limited to only those areas where it is required to facilitate construction or operations, which will maintain surface stability from existing vegetation.
- The CEMP will include controls as necessary to mitigate erosion and sedimentation potentially impacting downgradient areas.
- The BESS will be designed to have batteries self-contained within encapsulated modules, which can contain small leaks in the event of failure.
- The need for secondary containment of spills or further mitigations will be considered as part of detailed design and will be specified in the CEMP and Operational Environmental Management Plan.
- All hazardous materials stored and used on-site will be done so in accordance with the relevant Australian and International Standards.

7.3 Noise

A Noise Impact Assessment has been completed for the Project by Marshall Day Acoustics, a copy of which is provided in **Appendix H**.

Operational noise from the proposed wind turbines has been assessed with reference to the South Australian *Environmental Protection Authority – Wind Farms Environmental Noise Guidelines*, issued July 2009 and revised November 2021 (EPASA, 2021) and the Environmental Protection (Noise) Regulations 1997 (WA Noise Regulations), using a practical approach developed following consultation with DWER. The assessment has also considered operational noise from the proposed related infrastructure comprising a BESS and a substation, with predicted noise levels associated with the related infrastructure assessed in accordance with the WA Noise Regulations.

Background noise monitoring was undertaken to obtain a representation of typical baseline conditions in the vicinity of the Project and derive applicable noise limits for receivers, as defined by the SA Guidelines 2021.

The noise emission data has been used with international standard ISO 9613-22 to predict wind turbine noise levels at neighbouring noise sensitive receivers. The ISO 9613-2 standard has been applied using well-established input choices and adjustments, based on research and international guidance, that are specific to wind farm noise assessment.

As per the Position Statement (WAPC, 2020), noise sensitive receivers are “land uses that are residential or institutional in nature, where people live or regularly spend extended periods of time” which includes “dwellings, short-stay accommodation, schools, hospitals and childcare centres and generally exclude commercial or industrial premises”.

Noise modelling has been completed for multiple turbine layout iterations, with the aim of understanding and reducing impacts to adjoining properties and existing noise sensitive receivers through each revision, with the following key considerations:

- Complying with noise criteria at existing non-involved sensitive land uses (‘highly sensitive area’ – 35 dB) and at property boundaries (are ‘other than highly sensitive area’ – 60 dB) as per WA Noise Regulations.
- Minimising noise impacts to adjoining lots with no existing dwelling and existing road frontage, which are more suitable for development of dwellings or other noise-sensitive land uses.
- Ensuring noise impacts do not affect entire properties (that comprise multiple lots) under a single rural landholding, to minimise the impact on the ability of landowners to construct additional dwellings or other noise-sensitive land uses.
- Meeting a criteria of 45 dB at involved noise sensitive receivers (noting that subsequent recommendations from DWER is for noise not to exceed 40 dB at involved noise sensitive receivers).

7.3.1 Outcomes at Neighbouring Properties

Consideration of the above points has resulted in multiple changes to the Project Site and concept layout as described in **Section 3.2**. These changes include reduction in the number of turbines and relocation of turbines. This has significantly reduced the noise affected area on surrounding properties and contributed to the following outcomes:

- No exceedance of the noise criteria of 35 dB at existing non-involved dwellings or 60 dB at property boundaries.
- No adjoining single lot with a constructed road but no existing dwelling being noise affected by greater than approximately 50%.
- No single adjoining property (comprising multiple lots) being entirely within the 35 dB noise contour or being significantly impacted by noise.

Notwithstanding the above, there are a number of individual lots where noise levels may exceed 35 dB as a result of the Project. These wholly noise affected lots are located immediately to the west of the Project Site, and are part of a larger contiguous property holding with an existing dwelling. **Figure 7.1** shows the Project Site and key modelled noise contours with surrounding non-involved lots and dwellings. Lots without an existing dwelling that front a constructed road that intersect the 35 dB modelled noise contour are highlighted. **Figure 6.2** in **Section 6.4.4** provides further context.

7.3.2 Outcomes at Involved Dwellings

The SA Guidelines 2021 acknowledge that different noise limits can apply at the noise sensitive premises where the landowner has entered into an agreement with the proponent (involved receivers). The SA Guidelines 2021 refer to the WHO Guidelines and recommends a 30 dBA indoor limit. On the basis that the noise reduction from outside to inside with a window open is 15 dB (as per the assumption in the WHO Guidelines referenced in the SA Guidelines (2021), the outdoor noise limit would be 45 dB LAeq. This is consistent with the 2009 version of the SA Guidelines and the limits for involved receivers used in other jurisdictions in Australia (Marshall Day Acoustic, 2024).

Considering the above, Neoen has commercial agreements in place with all involved landholders that specifies that noise from the Project will not exceed 45 dB (outside)) at dwellings. Regardless, Neoen acknowledges that DWER has advised SDAU and the Shire of Narrogin that the recommended noise criteria for involved dwellings should not exceed 40 dB.

Modelled noise levels at involved dwellings are below 40 dB, with the exception of a single house (dwelling 25 in **Appendix H**) which is occasionally used by farm workers. Neoen is in discussions with the landholder with the intent that the dwelling will not be occupied for the duration of the Project.

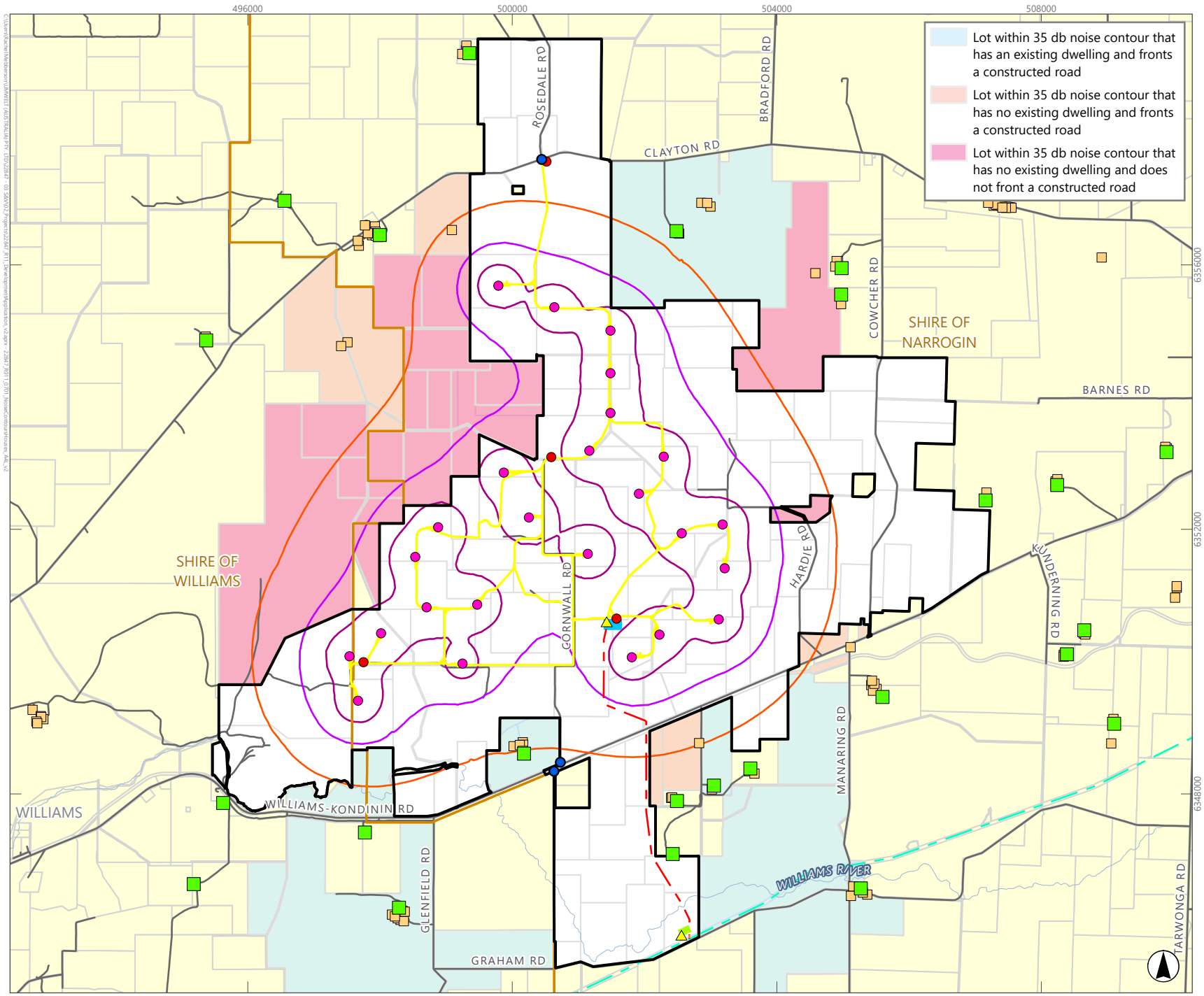


FIGURE 7.1

Noise Contours, Adjoining Lots and Surrounding Houses

Legend

- Project Site
- Local Government Area Boundary
- Road
- Existing 220kV Transmission Line
- Major Watercourse
- Non-involved House
- Non-involved Shed

Noise Contours

- 35db
- 40db
- 45db

Indicative Project Layout

- Turbine
- Firewater Tank
- Site Entry
- Communications Tower
- BESS, Substation and O&M Compound
- Western Power Terminal
- Overhead Transmission Connection
- Internal Roads and Underground Cabling (Permanent)

Note: Road as defined by the Western Australian Road Hierarchy

0 1.6 3.2

Kilometres

Scale 1:80,000 at A4
GDA2020 MGA Zone 50

Image Source: ESRI Basemap (2023) | **Data Source:** Landgate (2023), Neoen (2024), WP (2023)

7.4 Landscape and Visual

A LVIA has been completed for the Project by LatStudios (**Appendix I**). The Study Area for which the LVIA was completed encompasses an area approximately 30 km beyond the Project boundary. It is considered unlikely that there is any potentially significant adverse visual impact for receptors beyond 30 km of the Project.

The LVIA was completed with reference to accepted guidelines from Australia and elsewhere, including *Visual Landscape Planning in Western Australia – A Manual for Evaluation, Assessment, Siting and Design* (WAPC, 2007). The LVIA included a review of landscape and visual legislative context, desktop landscape and visual assessments, field survey, defining and describing the landscape and visual baseline (including Landscape Character Assessment and landscape and visual sensitivity), preparation of mapping and visualisations, assessment of magnitude and significance of landscape and visual change, cumulative assessment, consideration of mitigation potential, and a residual impact assessment.

The LVIA considered relevant planning provisions, including the Position Statement, the NLPS, Local Planning Strategy, LPP D11, the WTPS and LPP1, and local planning schemes and strategy's from surrounding LGAs. It also included a comprehensive review to identify key landscape and visual values in the region, for example the Dryandra Woodland National Park to the north of the Project.

The landscape character assessment defined six Landscape Character Types (LCTs) and associated Landscape Character Areas (LCAs) within 30 km of the Project Site. The landscape impact assessment has concluded that there would be:

- Direct moderate, not significant impact on LCT A (LCA A1: Dryandra – Narrogin Rural and Forested Uplands) due to the significant influence of wind turbines on localised parts of these rural areas.
- Direct minor to moderate, not significant impact on LCT B (LCA B4: Williams River major watercourse and tributaries) due to the potential for localised impacts associated with watercourse crossings with Project.
- No direct or significant impacts to all other LCTs.

The potential for views within 30 km of the Project was considered and sixteen viewpoints were selected to represent the views of identified receptors including:

- Residents living in the rural towns of Williams and Narrogin.
- Residents living on rural properties in the farmland on and surrounding the Project.
- Farmers and other people working in the rural landscape around the Project.
- Visitors and workers at Narrogin Aerodrome, including recreational 'gliders', and to a lesser extent visitors and staff at Downderry Wines.
- Recreational users of the landscape, including those visiting Dryandra Woodland National Park, Foxes Lair, Contine Hill Lookout and Picnic Area, Lions Lookout and Yilliminning Rock.
- Motorists (including tourists) using roads within the Study Area including the Albany Highway, Williams-Kondinin Road, Clayton Road, Cowcher Road and Curnows Road.

The LVIA determined there to be no significant impacts to identified receivers with the exception of passing motorists on Williams-Narrogin Road where close views toward turbines are possible (although existing roadside shelterbelts contribute significantly to reducing the availability of these close open views toward the infrastructure). Turbines will be visible against the backdrop of rolling hills and introduce new, dominant visual elements into what is currently a relatively undeveloped and typical rural landscape (Lat Studios, 2024).

For further details, including the assessment of visual sensitivities and magnitude of change from key viewpoints, refer to **Appendix I**.

7.5 Traffic and Transport

A Transport Impact Assessment (TIA) has been completed for the Project by Flyt (**Appendix J**). The TIA was prepared according to the WAPC Transport Impact Assessment Guidelines (Volume 4 – Individual Developments) (WAPC, 2016). Significant lead in work was completed prior to developing the TIA in order to assess potential transport impacts associated with the Project. This included:

- An initial high level due diligence exercise on routes and local accessibility factors.
- Review of analysis undertaken for other renewable energy projects in Western Australia and Eastern States to use as a baseline for this reporting.
- Route assessment for access to site from two separate port facilities, including engagement with the port operators and Main Roads WA on the initial route assessment.
- Engagement with the Main Roads WA Wheatbelt and South-West Offices, the Bunbury Outer Ring Road (BORR) project team, and Shires of Williams and Narrogin.
- Swept path analysis for a baseline turbine and transformer components from both ports.
- Analysis of road network configurations for the routes and then determination of the most practical transport corridor.
- Analysis of component configuration and determination of truck and trailer combinations.
- Detailed in-vehicle route assessment for transportation of components from nominated port.

Overall, the TIA and associated activities determined that:

- There is a feasible transport route from both Bunbury Port and the Australian Maritime Complex (AMC). Bunbury Port was selected as the most feasible and manageable route and was assessed in greater detail.
- A more detailed route assessment will need to be completed to inform required road modifications along the route. Likely modifications along the route that has been assessed are outlined in the TIA and have been discussed with Main Roads WA.
- A detailed TMP would be required to be submitted to Main Roads WA for approval, along with the required permits and approvals for road modifications and transportation. It is expected that completion of the TMP and required Main Roads WA approvals would be a condition of approval for the Project.

- There are no underlying safety issues on the local network or network adjacent to the Project site. Traffic volumes associated with the project can be accommodated on the existing network.

Further details on transport impacts and recommended mitigations are provided in **Appendix J**.

7.6 Aboriginal Heritage

Archae Aus assessed the potential for Aboriginal and historical (European) heritage within the Project Site (**Appendix K**). This included the identification of any potential heritage constraints under the *Aboriginal Heritage Act 1972* (AHA) or historical heritage under the *Heritage Act 2018*.

The desktop assessment identified three known Registered Sites that intersect the Project Site: *Manaring Road* (DPLH ID 5826), *Geeralying, Narrogin* (DPLH ID 5888), and *Geeralying* (DPLH ID 15139). All of these sites have been avoided and will not be disturbed by the Project.

Due to the size of the Project Site, diversity of landscape features often associated with Aboriginal Cultural Heritage (ACH), presence of Aboriginal Registered Sites, lack of previous heritage assessments and historical and ethnographic context of the area, there is a high potential for ACH to be present in certain sections of the Project Site. These areas are those that show signs of minimal disturbance, with minimal impact to subsurface soils, and they are more likely to occur where there is undisturbed bedrock and rock formations, along undisturbed watercourses and where there is remnant vegetation. Through the design of the Project to date, Neoen has aimed to minimise overlap of project infrastructure with these areas.

Neoen has undertaken engagement with SWALSC, GKB Aboriginal Corporation, Willman Aboriginal Corporation and KEEDAC, and commits to completing surveys and implementing appropriate Aboriginal cultural heritage controls in consultation with these stakeholders.

7.7 Historical and European Heritage

A desktop assessment of historical (European) heritage in the Project Site and surrounds was completed by Archae Aus (**Appendix K**). This included the identification of any historical heritage under the *Heritage Act 2018*.

Three places of historic heritage significance are within the Project Site, and five places of local historic heritage significance are adjacent or close to the Project Site. All identified places have been avoided and will not be disturbed by the Project.

7.8 Aviation

Aviation Projects (2024) were engaged to complete a preliminary aviation assessment to inform Project design and an Aviation Impact Assessment for the final concept layout for the Project (**Appendix L**).
The Aviation Impact Assessment assesses the potential aviation impacts associated with the Project and provides aviation safety advice in respect of relevant requirements of air safety regulations and procedures and informs and documents consultation with relevant aviation agencies. The Aviation Impact Assessment addresses relevant requirements of the DPLH Position Statement for renewable energy facilities (March 2023), the Shire of Narrogin LPP D11, and the Shire of Williams LPP1.

The Aviation Impact Assessment has been completed based on the final concept turbine layout as presented in this document. Outcomes of preliminary aviation assessments have been used to inform the layout, with turbines removed or relocated to mitigate potential aviation impacts.

Key potential aviation impacts that have been identified and considered as part of the Aviation Impact Assessment include:

- **Safe operation of the Narrogin aerodrome** (YNRG) as a verified public Aircraft Landing Area (ALA), including use by the Royal Flying Doctors Service (RFDS) and for gliding. The Aviation Impact Assessment concluded that the Project would not cause safety impacts for aircraft operations at the aerodrome, although there may be an inconvenience to gliding operations by limiting gliding activity in the immediate vicinity of the Project Site.
- **Potential certification of YNRG in the future**. The Project will not affect the future certification of Narrogin aerodrome, or the potential introduction of instrument flight procedures (as confirmed by the feasibility studies conducted by an approved instrument flight procedure designer).
- **Potential impacts to private ALAs that are used for aerial crop spraying**. The Aviation Impact Assessment concluded that aircraft operations to private ALAs in the vicinity of the Project Site still considered feasible for aerial application aircraft if the Project is developed. The 100 m setback distance (from a turbine to non-involved property boundary) specified by the Aerial Application Association of Australia (AAAA) has been exceeded with the proposed Project configuration, with a distance of at least 325 m between the nearest turbine and non-involved property boundary.

Further details are provided in **Appendix L.**

7.9 Bushfire

Bushfire Prone Planning have completed a Bushfire Management Plan (BMP) and a Bushfire Risk Report (BRR) for the Project (**Appendix M** and **Appendix N**). Prior to the BMP and BRR being prepared, Bushfire Prone Planning provided initial high-level advice on whether there were potential bushfire risks for the Project Site. All assessments by Bushfire Prone Planning addressed requirements SPP3.7 and the associated *Guidelines for Planning in Bushfire Prone Areas v1.4*, and also considered *Guidelines and Model Requirements – Renewable Energy Facilities v4* (Country Fire Authority (CFA), 2023) as a guiding (non-regulatory) document.

The BMP:

- Sets out the required package of bushfire protection measures to lessen the risks associated with a bushfire event.
- Establishes the responsibilities to implement and maintain these measures.
- Assesses the capacity of the proposed development or use to implement and maintain the required ‘acceptable’ solutions and any additionally recommended bushfire protection measures - or its capacity to satisfy the policy intent through the justified application of additional bushfire protection measures as supportable ‘alternative’ solutions.

The BRR:

- Identifies the level of exposure and vulnerability of any onsite stored materials and liquids to bushfire attack mechanisms (threats).
- Identifies any potential source of ignition threat the use may present to adjoining and/or adjacent bushfire prone vegetation.
- Recommends protection measures that can be incorporated into the site operations emergency plan as necessary.

The BMP and BRR have concluded that the Project is fully compliant with all acceptable solutions of the bushfire protection criteria. For further details refer to **Appendix M** and **Appendix N.**

7.10 Electromagnetic Interference

DNV were commissioned to independently assess potential electromagnetic interference (EMI) impacts associated with the development and operation of the proposed Project. The final report describing the results of the EMI assessment is provided in **Appendix O**.

DNV assessed the potential EMI impacts for the Project in accordance with the *Draft National Wind Farm Development Guidelines* (Environment Protection and Heritage Council (EPHC), 2010) and in reference to various standard industry practices. A preliminary assessment was first completed, the outcomes of which were used to mitigate potential EMI related impacts. The final EMI assessment completed for the Indicative Project Layout concluded that:

- Interference with point-to-point links is considered unlikely, based on diffraction exclusion zones calculated by DNV for fixed point-to-point links passing over the Project boundaries and consultation with operators of these links.
- There is the potential for interference with point-to-area style services such as mobile phone signals, radio broadcasting, and terrestrial television broadcasting, particularly in areas with poor or marginal signal coverage. If interference to these services is experienced, a range of options are available to rectify difficulties. It is worth noting that cellular service in the vicinity of the Project Site is particularly poor and there are many areas where it is not possible to connect currently.
- DNV has consulted with organisations identified in this assessment as operating point-to-multipoint services that may be affected by the Project. The Bureau of Meteorology has advised that impacts to their weather radar systems are expected to be manageable, and no concerns have been raised to date regarding potential impacts to point-to-multipoint links or emergency services operations.
- Potential EMI impacts on other services such as trigonometrical stations and survey marks, satellite television and internet services, and CB radio, are not expected or are considered to be minor.

For further details refer to **Appendix O.**

7.11 Shadow Flicker and Blade Glint

DNV assessed the expected annual shadow flicker durations in the vicinity of the proposed Project. The results of the assessment are described in **Appendix P**.

DNV assessed the expected shadow flicker durations for the Project against limits specified in the *Draft National Wind Farm Development Guidelines* (EPHC, 2010). The Draft National Guidelines recommend limits of 30 hours per year on the theoretical shadow flicker duration, and 10 hours per year on the actual shadow flicker duration.

The locations of 37 receptors surrounding the Project were considered as part of the assessment, with eight of these receptors involved in the Project. The theoretical shadow flicker durations at dwellings in the vicinity of the Project was determined based on geometric analysis, and the actual shadow flicker duration likely to be experienced at each dwelling predicted by estimating the possible reduction in shadow flicker due to turbine orientation and cloud cover.

Based on the assessment:

- The theoretical and predicted actual annual shadow flicker duration at non-involved properties is zero hours.
- Four involved dwellings are predicted to experience some shadow flicker above a moderate level of intensity. Neoen has agreements in place with the owners of these four dwellings in relation to potential shadow flicker impacts.

8.0 References

Aerial Agricultural Association of Australia (AAAA). (2014). *National Windfarm Operating Protocols*. https://aaaa.org.au/wp-content/uploads/2023/12/AAAA-Windfarm-Operational-Protocols-2014.pdf

Archae-aus. (2024). *Report of an Aboriginal Heritage Due Diligence Assessment for the Proposed Narrogin Wind Farm, Narrogin Western Australia*.

Australian Bureau of Statistics (ABS). (2021). *2021 Census All persons QuickStats*. https://abs.gov.au/census/find-census-data/quickstats/2021/SAL51614

Australian Energy Infrastructure Commissioner (AEIC). (2022). *Annual Report to the Parliament of Australia*. https://www.aeic.gov.au/sites/default/files/documents/2023-06/aeic-2022-annual-report.pdf

Aviation Projects. (2024). *Aviation Projects: Aviation Impact Assessment*.

Bamford Consulting Ecologists (BCE). (2020). *Scoring System for the Assessment of Foraging Value of Vegetation for Black-Cockatoos*. https://ecologists.bamford.id.au/ecological-consulting/black-cockatoos

Bureau of Meteorology (BOM). (2024a). *Monthly Rainfall: Narrogin Station (010614)*. http://www.bom.gov.au/climate/data/

Bureau of Meteorology (BOM). (2024b). *Monthly Temperature: Narrogin Station (010614)*. http://www.bom.gov.au/climate/data/

Bushfire Prone Planning. (2024). *Bushfire Management Plan*.

Clean Energy Council. (2018). *Best Practice Guidelines for Implementation of Wind Energy Projects in Australia*. https://assets.cleanenergycouncil.org.au/documents/advocacy-initiatives/community-engagement/wind-best-practice-implementation-guidelines.pdf

Coakes, S., & Sadler, A. (2011). *Utilizing a sustainable livelihoods approach to inform social impact assessment practice.* https://www.researchgate.net/publication/287341953_Utilizing_a_sustainable_livelihoods_approach_to_inform_social_impact_assessment_practice

Country Fire Authority (CFA). (2023). *Renewable Energy Facilities v4*. https://www.cfa.vic.gov.au/ArticleDocuments/1933/240207-CFA%20DGMR%20Renewable%20Energy%20Facilities%20v4.2.pdf

Department of Agriculture, Water and the Environment (DAWE). (2022). *Referral Guideline for 3 WA Threatened Black Cockatoo Species*. https://www.dcceew.gov.au/sites/default/files/documents/referral-guideline-3-wa-threatened-black-cockatoo-species-2022.pdf

Department of Energy, Mines, Industry Regulations and Safety (DEMIRS). (2024). *SWIS Demand Assessment*. https://www.wa.gov.au/government/document-collections/swis-demand-assessment

Department of Planning and Environment (DPE). (2023). *Social Impact Assessment Guideline.* https://www.planningportal.nsw.gov.au/sites/default/files/documents/2023/GD1944%20SIA%20Guideline_NEW%20VI_14_02_23.pdf

Department of Planning (DoP). (2016). *State Planning Policy 2.5—Rural Planning—December 2016*.

Department of Planning, Housing and Infrastructure (DPHI). (2024). *Renewable Energy Planning Framework*. https://www.planning.nsw.gov.au/policy-and-legislation/renewable-energy#renewable-energy-planning-framework

Department of Planning Lands and Heritage (DPLH). (2017). *State Planning Policy 1: State Planning Framework*.

Department of Planning Lands and Heritage (DPLH). (2024). *Draft Operational Policy 1.13*. https://www.wa.gov.au/system/files/2024-06/draft-operational-policy-1.13-significant-development-pathway-public-interest-considerations-may-2024.pdf

Department of Transport and Planning (DTP). (2023). *Planning Guidelines for Development of Wind Energy Facilities*. https://www.planning.vic.gov.au/__data/assets/pdf_file/0021/570630/Development-of-wind-energy-facilities.pdf

Department of Water and Environmental Regulation (DWER). (2020). *Western Australian Climate Policy*. https://www.wa.gov.au/system/files/2020-12/Western_Australian_Climate_Policy.pdf

Department of Water and Environmental Regulation (DWER). (2022a). *Proclaimed groundwater areas map*. https://www.wa.gov.au/government/publications/proclaimed-groundwater-areas-map

Department of Water and Environmental Regulation (DWER). (2022b). *Proclaimed surface water areas map*. https://www.wa.gov.au/government/publications/proclaimed-surface-water-areas-map

DNV. (2024). *Narrogin Wind Farm EMI Assessment*.

Energy Policy WA. (2021). *Energy Transformation Strategy Stage 2: 2021-2025*. Government of Western Australia. https://www.wa.gov.au/government/publications/leading-western-australias-brighter-energy-future

Environment Protection and Heritage Council (EPHC). (2010). *National Wind Farm Development Guidelines—Draft*. https://www.nepc.gov.au/sites/default/files/2022-09/draft-national-wind-farm-development-guidelines-july-2010.pdf

Environmental Protection Authority (EPA). (2016). *Technical Guidance—Flora and Vegetation Surveys for Environmental Impact Assessment*. Government of Western Australia. https://www.epa.wa.gov.au/policies-guidance/technical-guidance-flora-and-vegetation-surveys-environmental-impact-assessment

Environmental Protection Authority (EPA). (2020). *Technical Guidance—Terrestrial Vertebrate Fauna Surveys for Environmental Impact Assessment*. Government of Western Australia. https://www.epa.wa.gov.au/policies-guidance/technical-guidance-terrestrial-vertebrate-fauna-surveys-environmental-impact

Environmental Protection Authority (EPA). (2021). *Wind Farms Environmental Noise Guidelines*. Government of South Australia. https://www.epa.sa.gov.au/files/47788_windfarms.pdf

Flyt. (2024). *Narrogin Wind Farm Transport Assessment*.

Independent Planning Commission (IPC). (2024). *Hills of Gold Wind Farm SSD-9679*. https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2023/12/hills-of-gold-wind-farm/case-outcome/statement-of-reasons-for-decision--hills-of-gold-wind-farm-ssd9679.pdf

Landgate. (2024). *Medium Scale Topo Water (Line) (LGATE-018)* [Dataset]. https://catalogue.data.wa.gov.au/dataset/medium-scale-topo-water-line-lgate-018

Lat Studios. (2024). *Narrogin Wind Farm Landscape and Visual Impact Assessment*.

Marshall Day Acoustic. (2024). *Narrogin Wind Farm Detailed Acoustic Assessment*.

Main Roads Western Australia (MRWA). (2024). *Western Australian Road Hierarchy*. https://www.mainroads.wa.gov.au/globalassets/technical-commercial/planning-development/about-the-western-australian-road-hierarchy-website.pdf?v=4a1d6f

Open Electricity. (2024). *Open Electricity*. https://explore.openelectricity.org.au/facilities/nem/?selected=DEIBDL&status=operating

State Development Assessment Provisions (SDAP). (2024). *Planning guideline*. https://www.planning.qld.gov.au/__data/assets/pdf_file/0033/96594/planning-guidance-state-code-23-wind-farm-development.pdf

The Department for International Development (DFID). (1999). *Sustainable livelihoods guidance sheets*.

Western Australian Planning Commission (WAPC). (2003). *State Planning Policy No. 2: Environmental and natural resources policy*. Department of Planning, Lands and Heritage. https://www.wa.gov.au/government/publications/state-planning-policy-20-environment-and-natural-resources-policy#:~:text=The%20objectives%20of%20the%20policy,and%20management%20of%20natural%20resources.

Western Australian Planning Commission (WAPC). (2006). *State Planning Policy 2.9: Water resources*. Government of Western Australia. https://www.wa.gov.au/government/publications/state-planning-policy-29-water-resources

Western Australian Planning Commission (WAPC). (2007). *Visual Landscape Planning in Western Australia*. Department of Planning, Lands and Heritage.

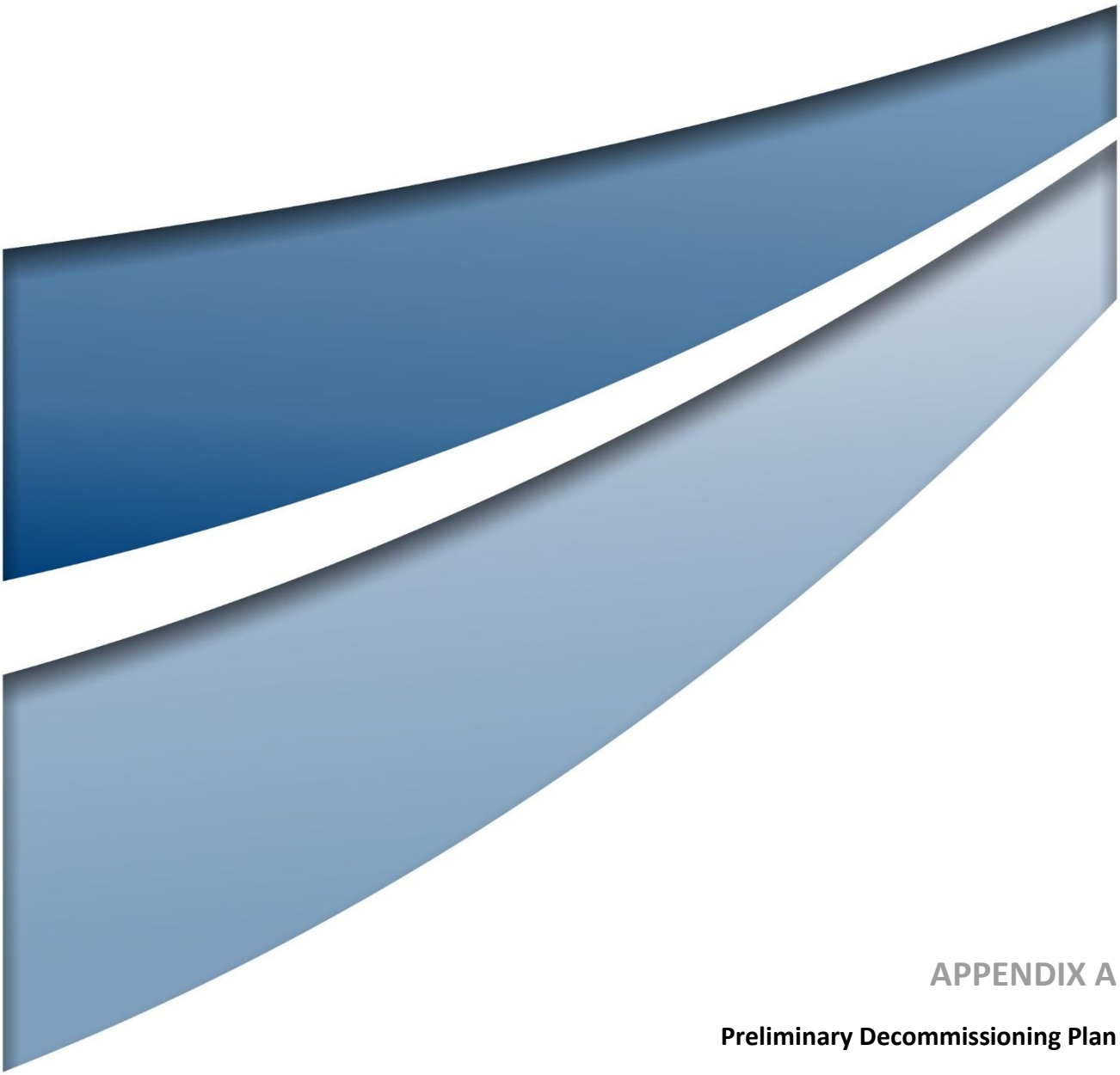
Western Australian Planning Commission (WAPC). (2015). *State Planning Policy No. 3.7: Planning in bushfire prone areas*. Government of Western Australia. https://www.wa.gov.au/government/document-collections/state-planning-policy-37-planning-bushfire-prone-areas#:~:text=SPP%203.7%20seeks%20to%20guide,bushfire%20on%20property%20and%20infrastructure.

Western Australian Planning Commission (WAPC). (2016). *Transport Impact Assessment Guidelines Vol. 4* (No. Individual Developments). Government of Western Australia. https://www.wa.gov.au/government/publications/planning-guidelines-transport-impact-assessment

Western Australian Planning Commission (WAPC). (2020). *Position Statement: Renewable energy facilities*. https://www.wa.gov.au/system/files/2021-07/POS-Renewable-energy-facilities-position-statement.pdf

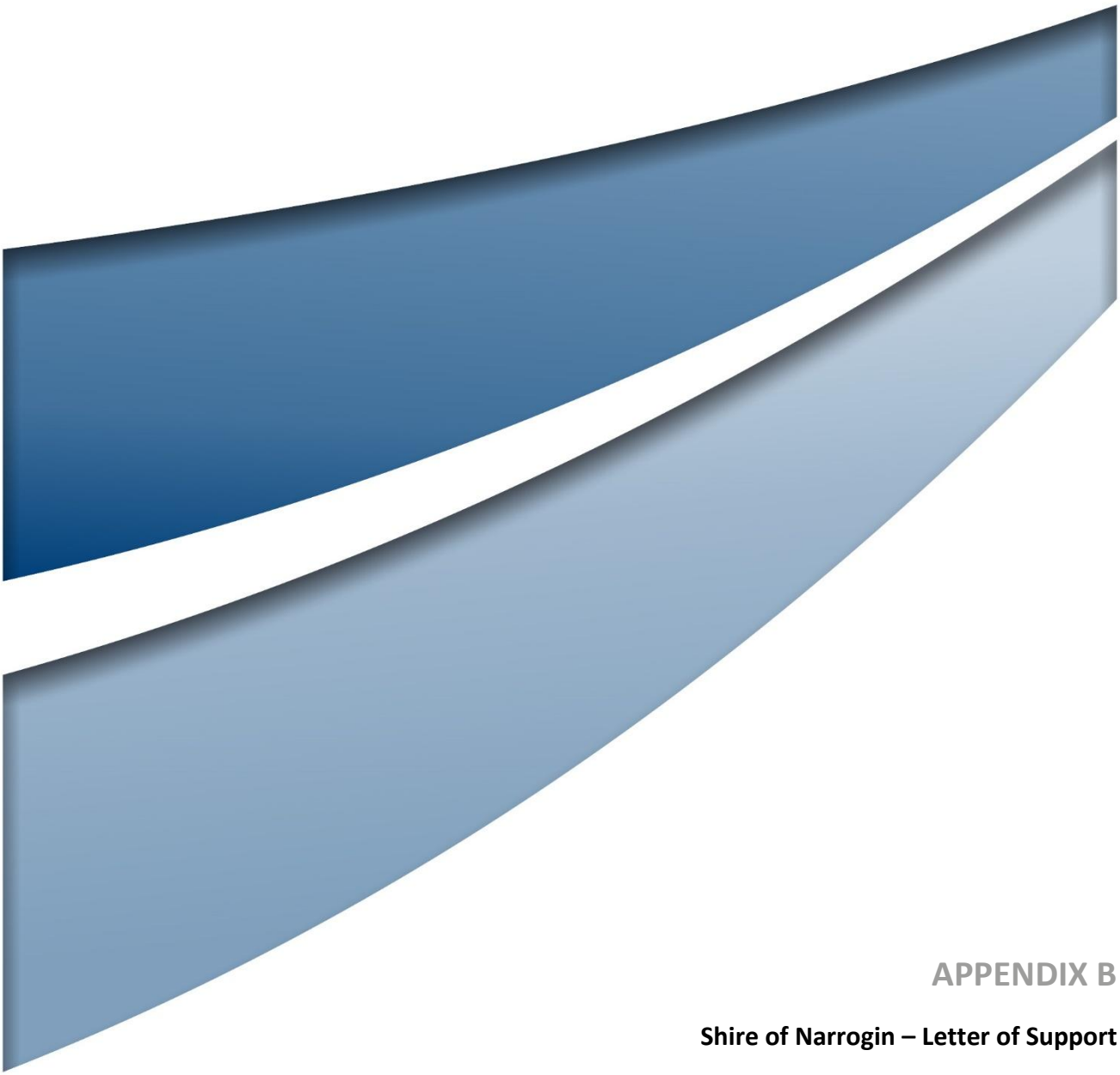
Western Australian Planning Commission (WAPC). (2021). *State Planning Strategy 2050*. https://www.wa.gov.au/government/publications/state-planning-strategy-2050

WGA. (2024). *Flood Modelling*.



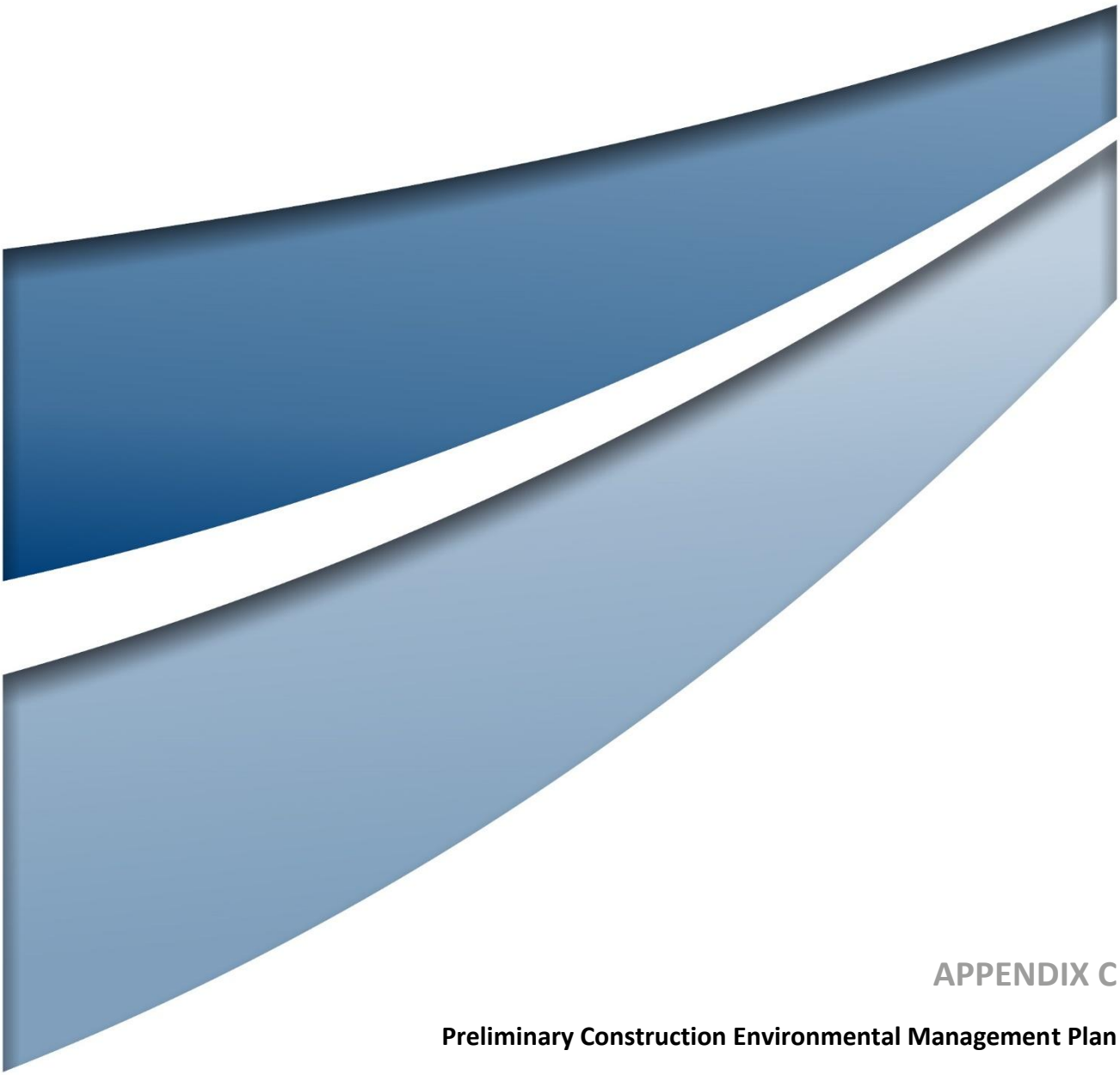
APPENDIX A

Preliminary Decommissioning Plan



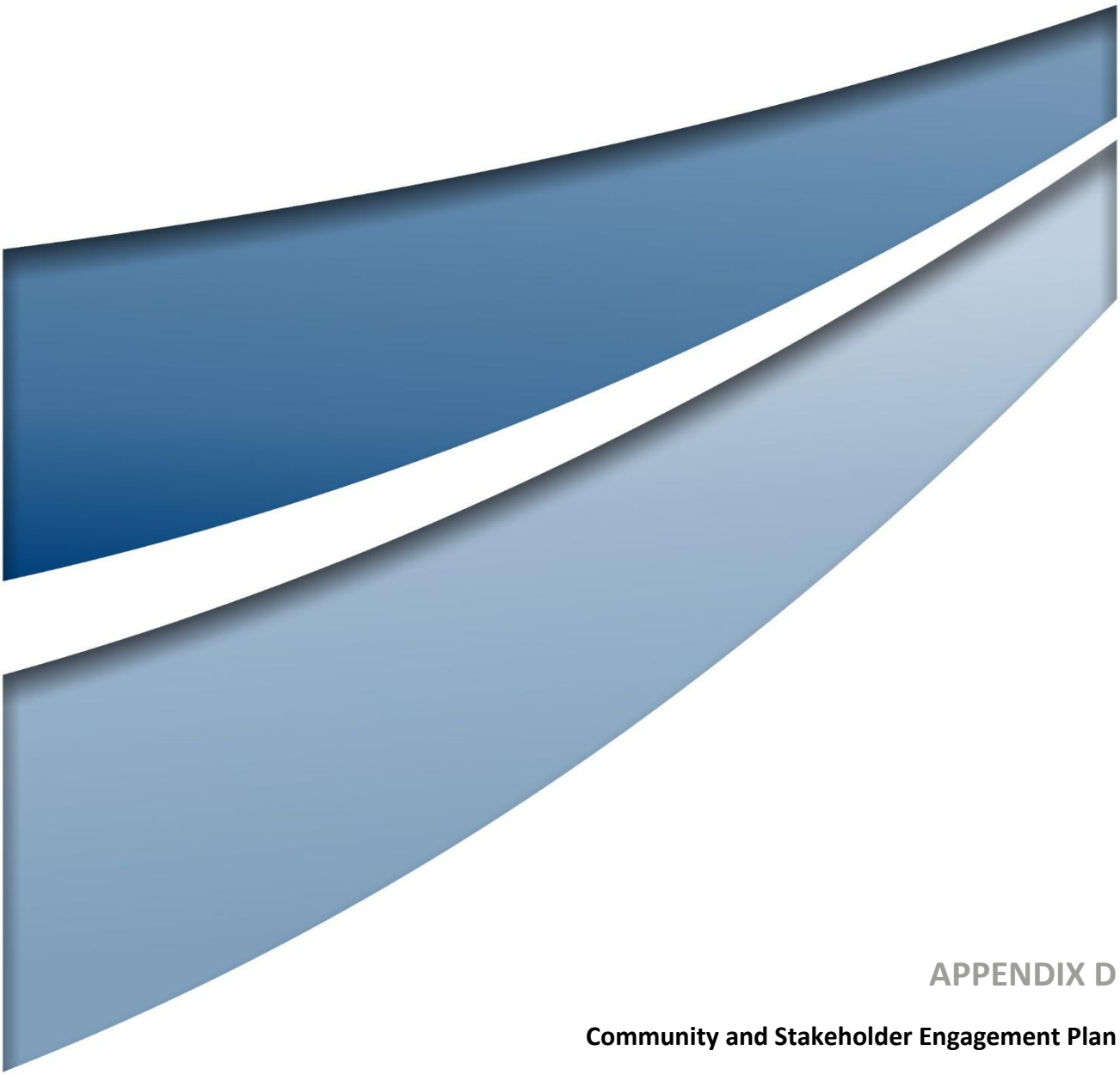
APPENDIX B

Shire of Narrogin – Letter of Support



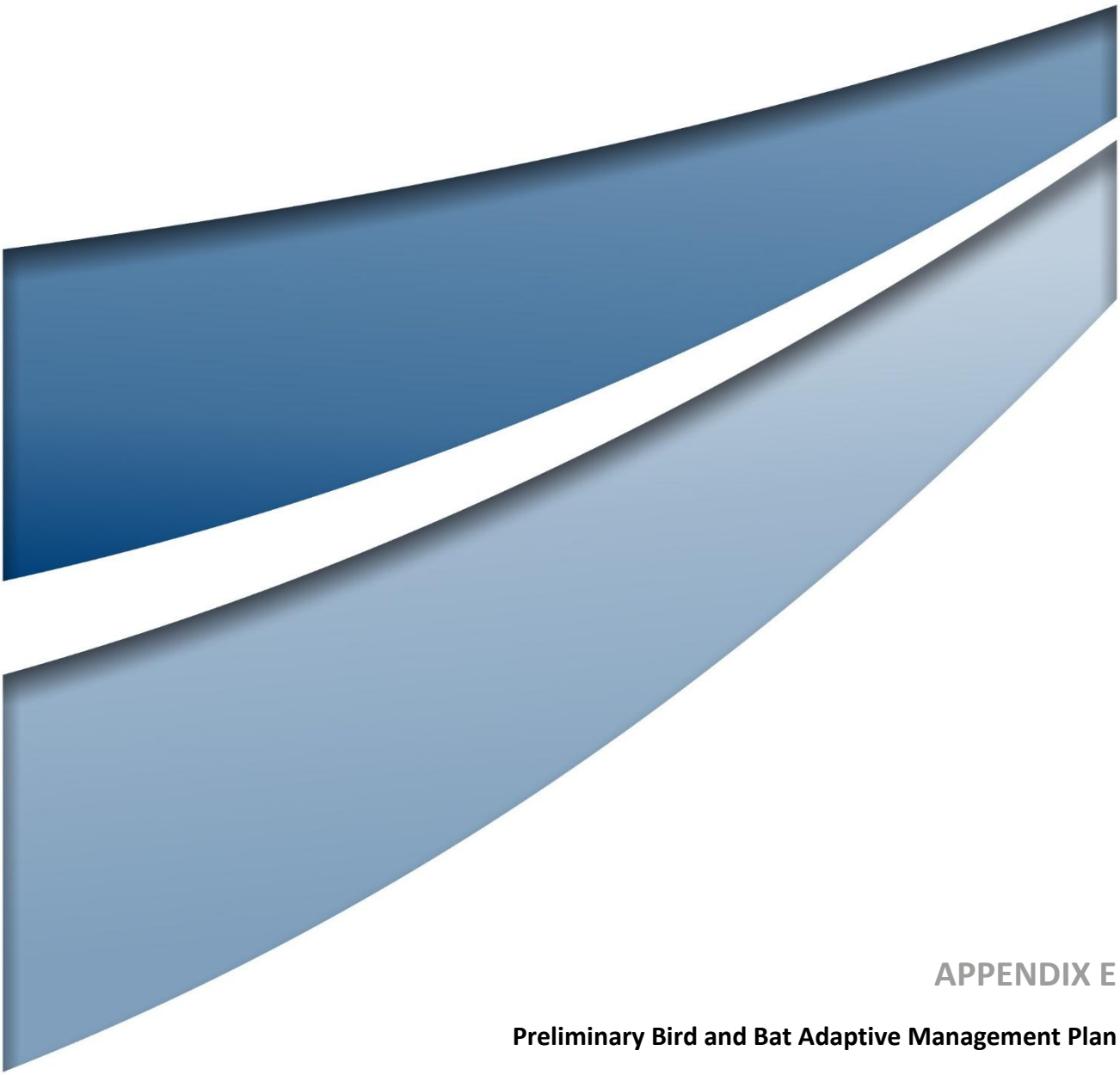
APPENDIX C

Preliminary Construction Environmental Management Plan



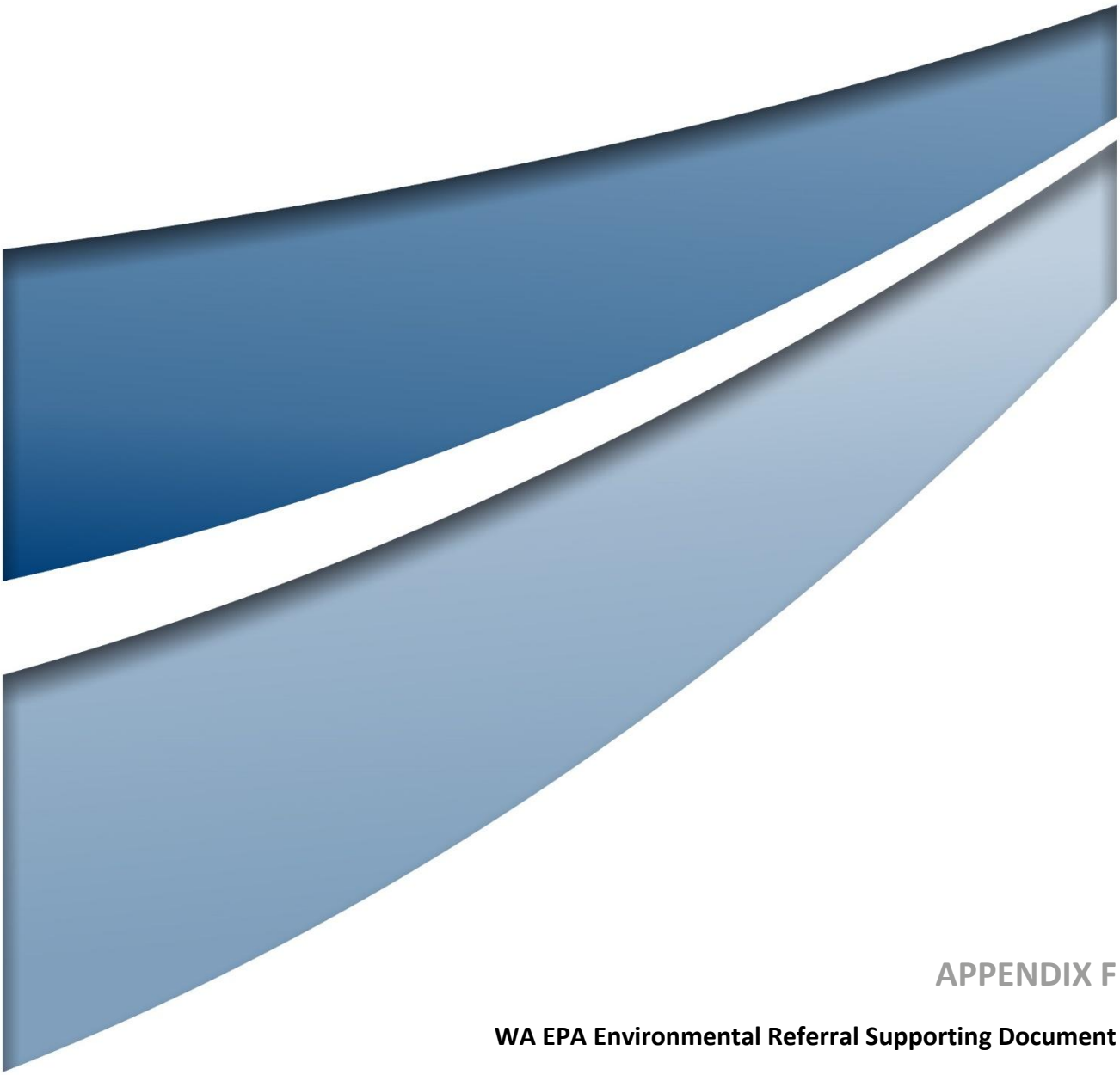
APPENDIX D

Community and Stakeholder Engagement Plan



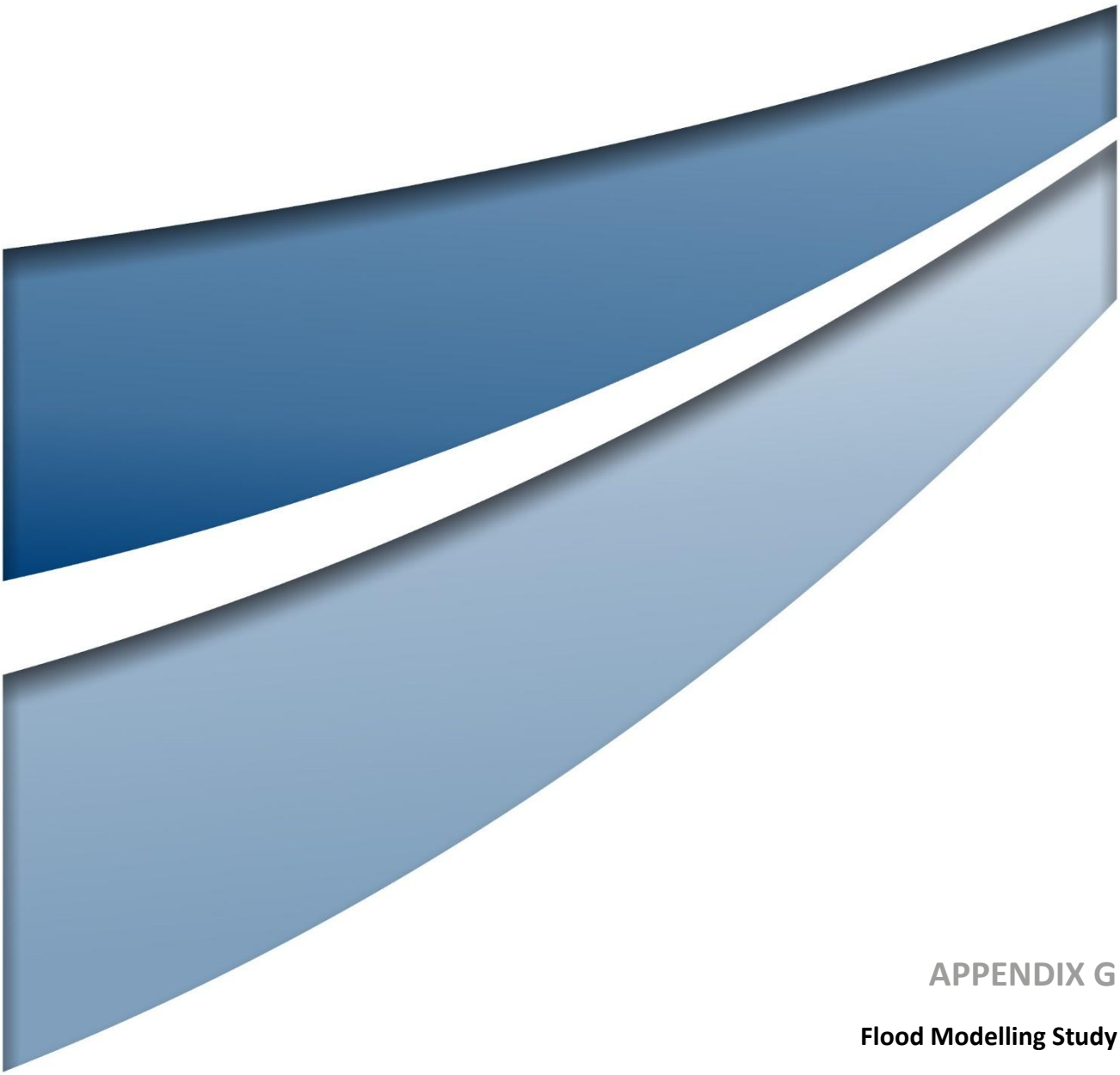
APPENDIX E

Preliminary Bird and Bat Adaptive Management Plan



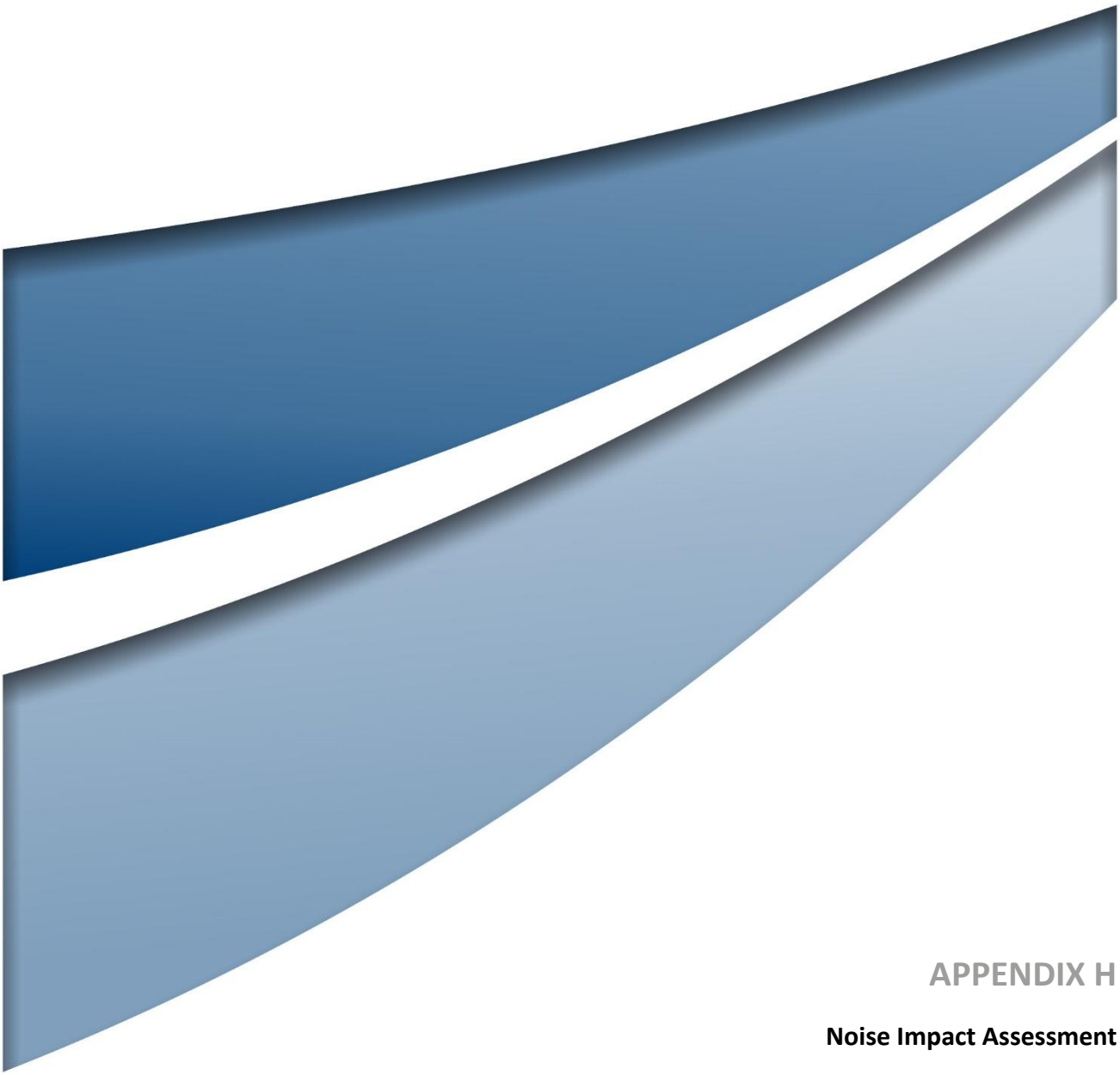
APPENDIX F

WA EPA Environmental Referral Supporting Document



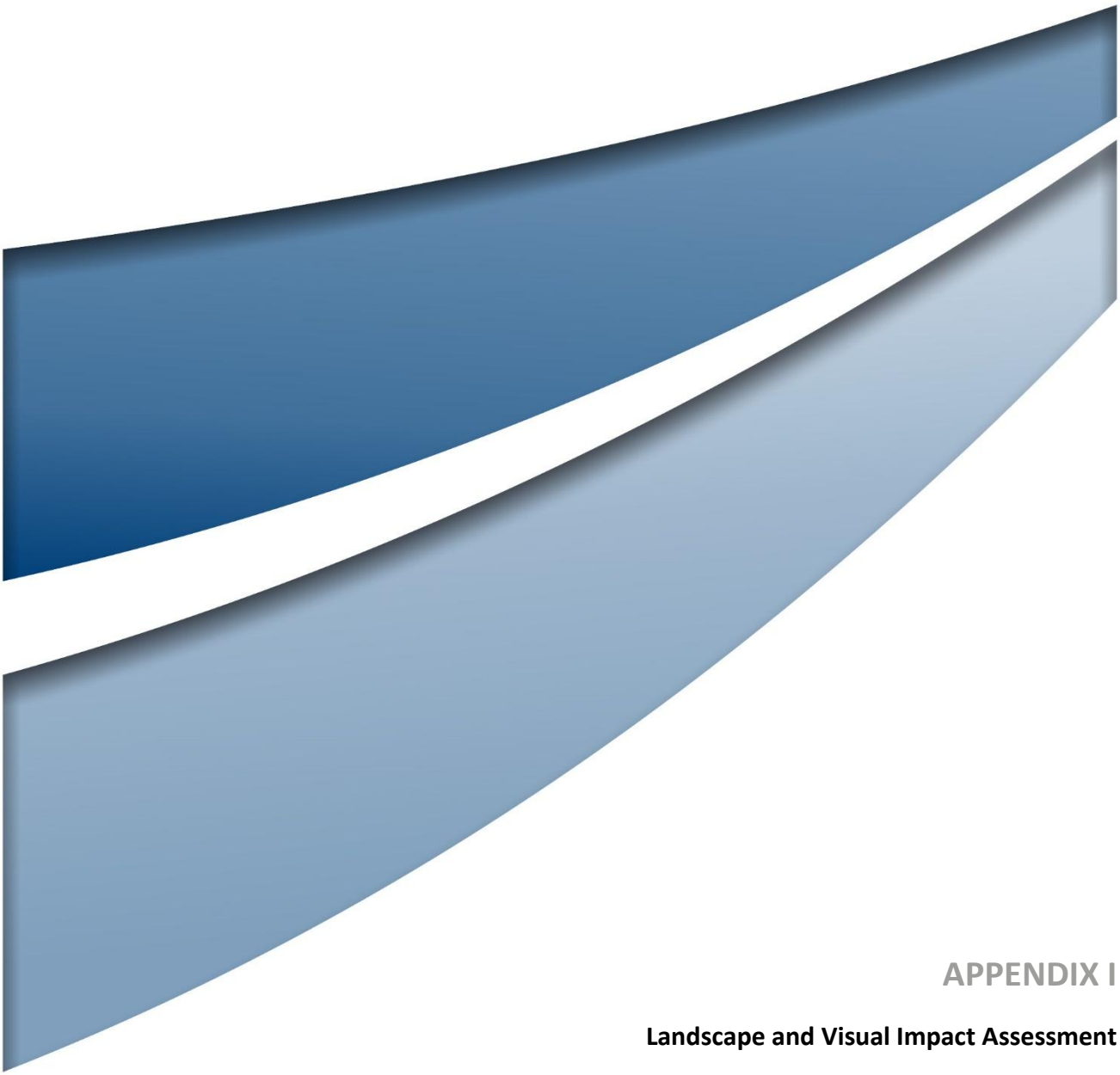
APPENDIX G

Flood Modelling Study



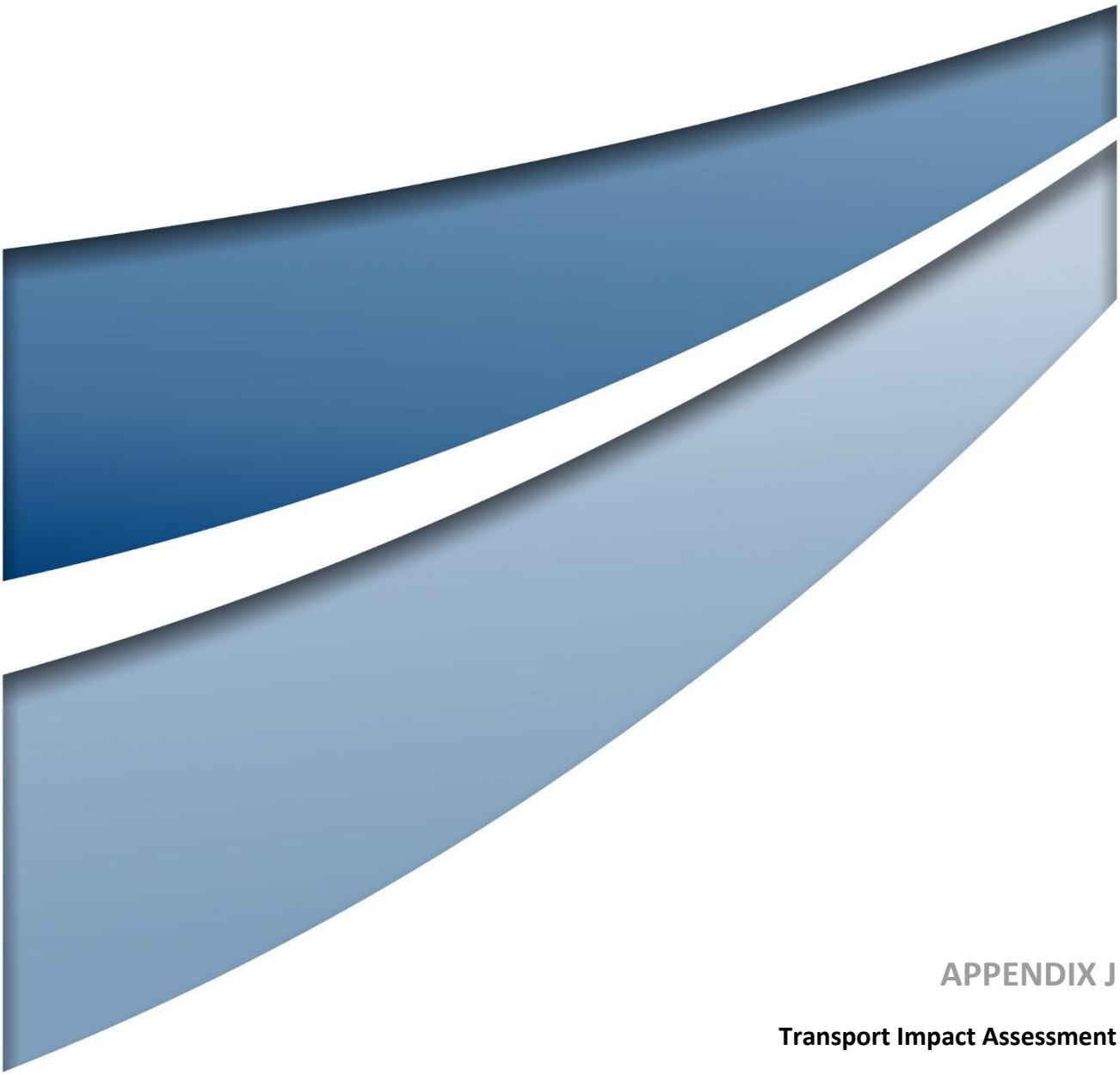
APPENDIX H

Noise Impact Assessment



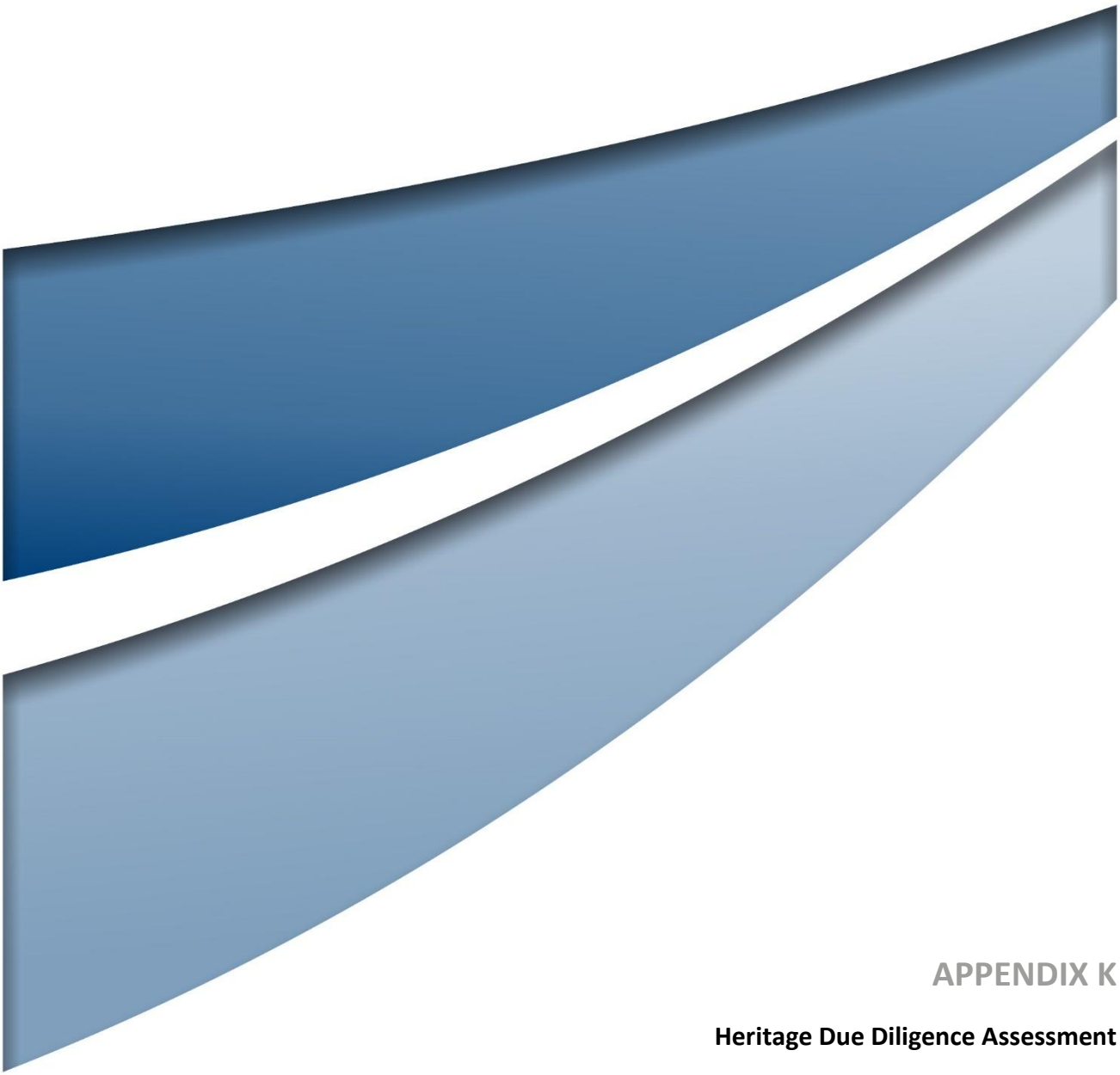
APPENDIX I

Landscape and Visual Impact Assessment



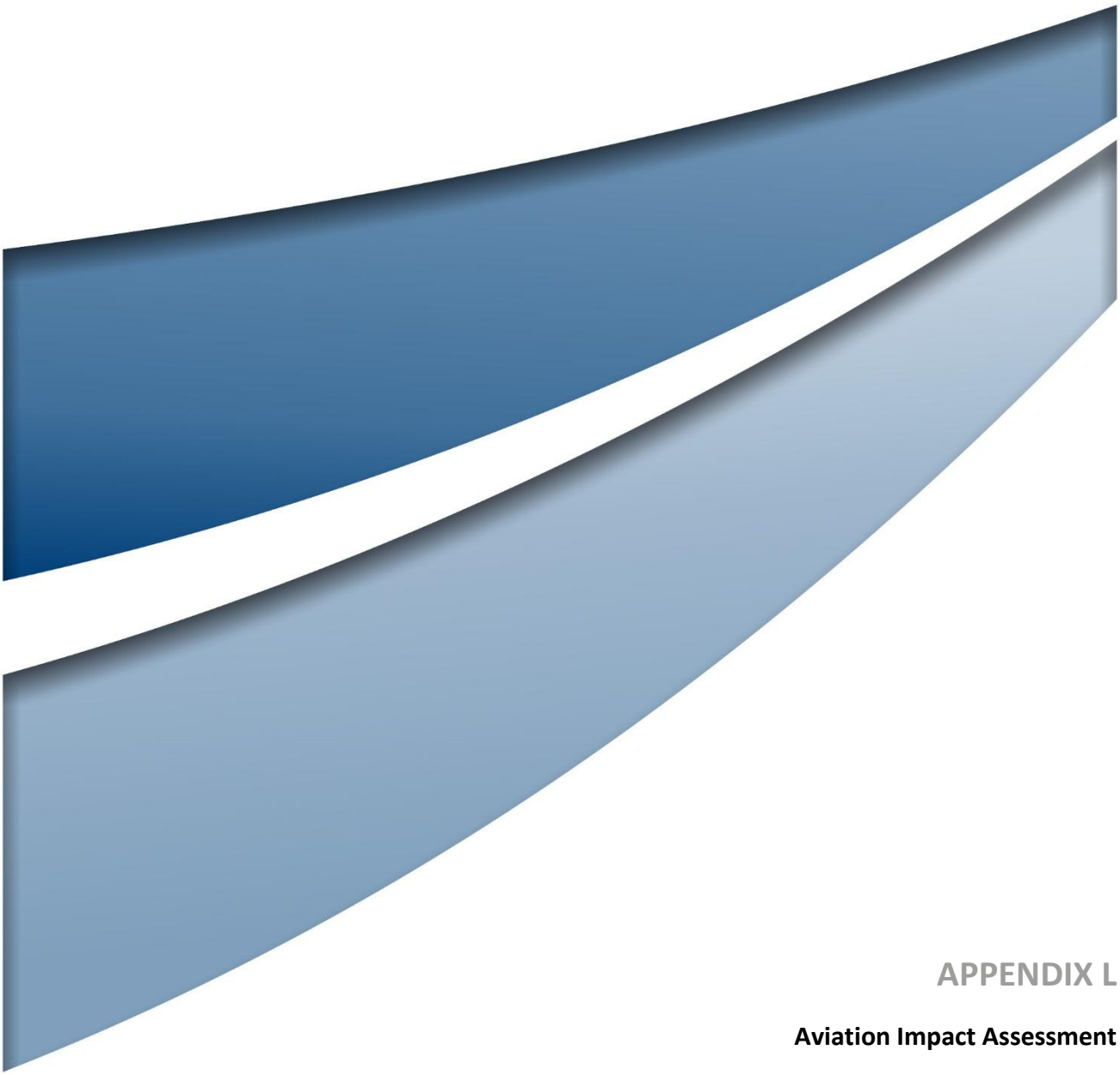
APPENDIX J

Transport Impact Assessment



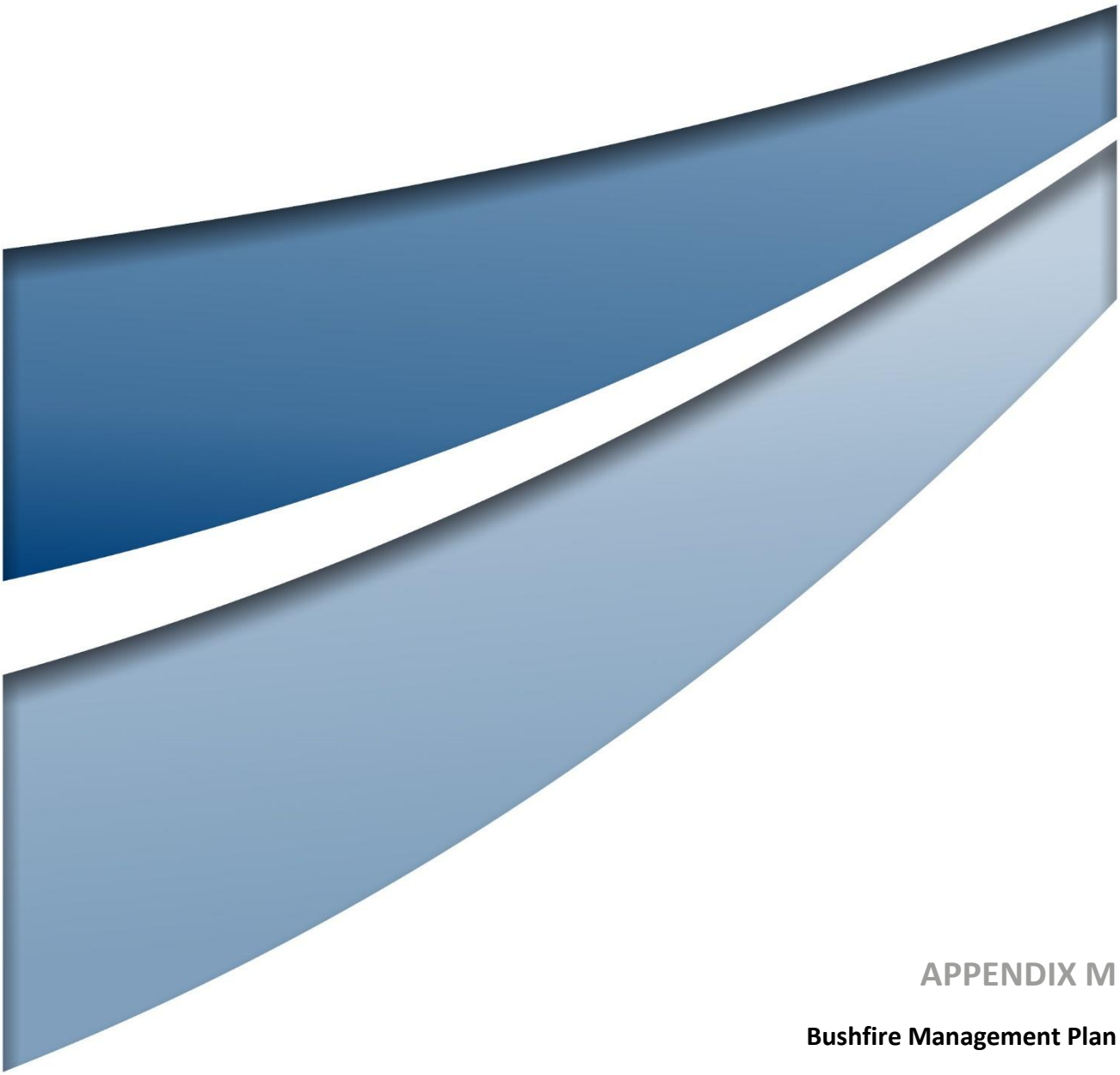
APPENDIX K

Heritage Due Diligence Assessment



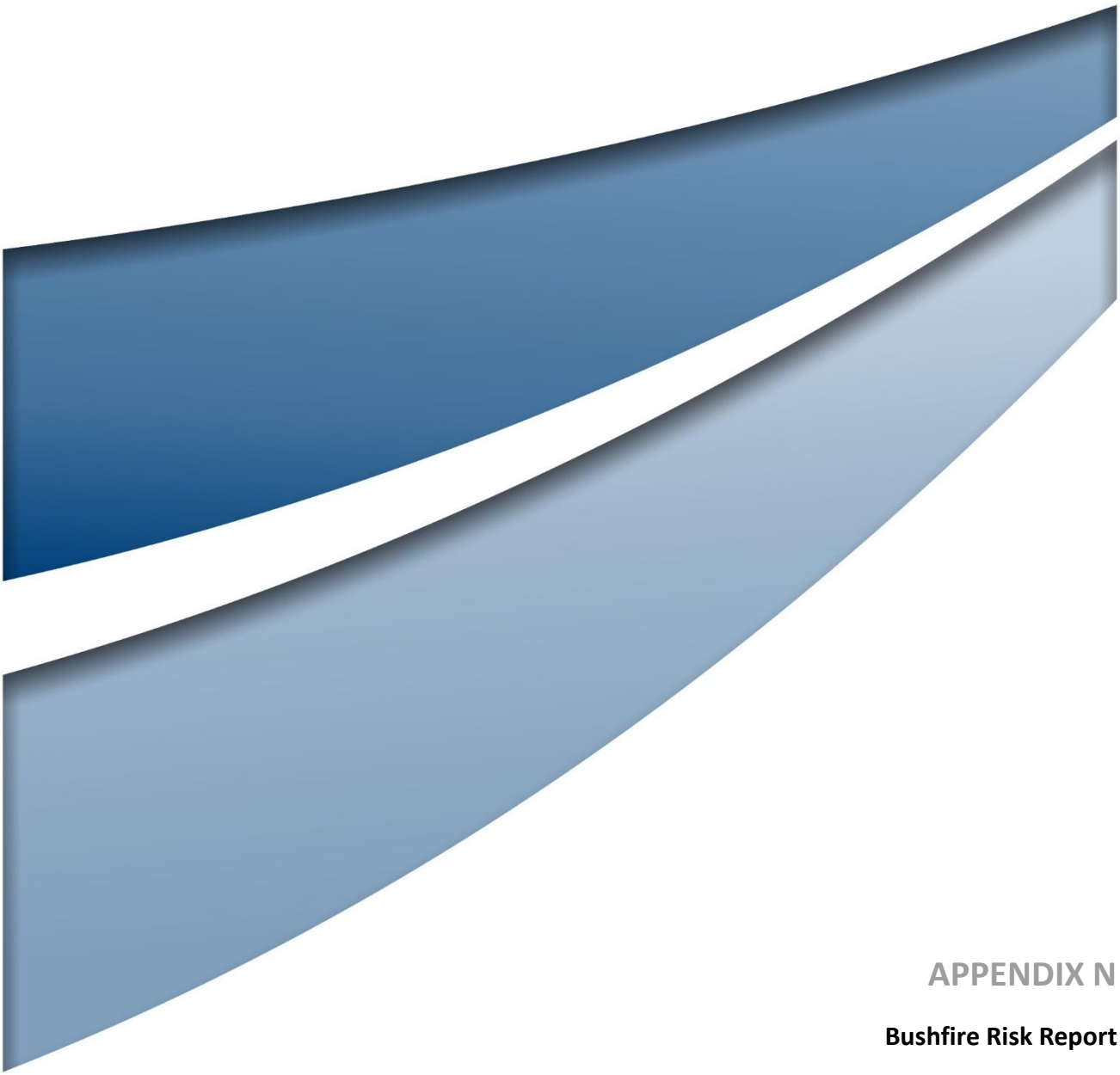
APPENDIX L

Aviation Impact Assessment



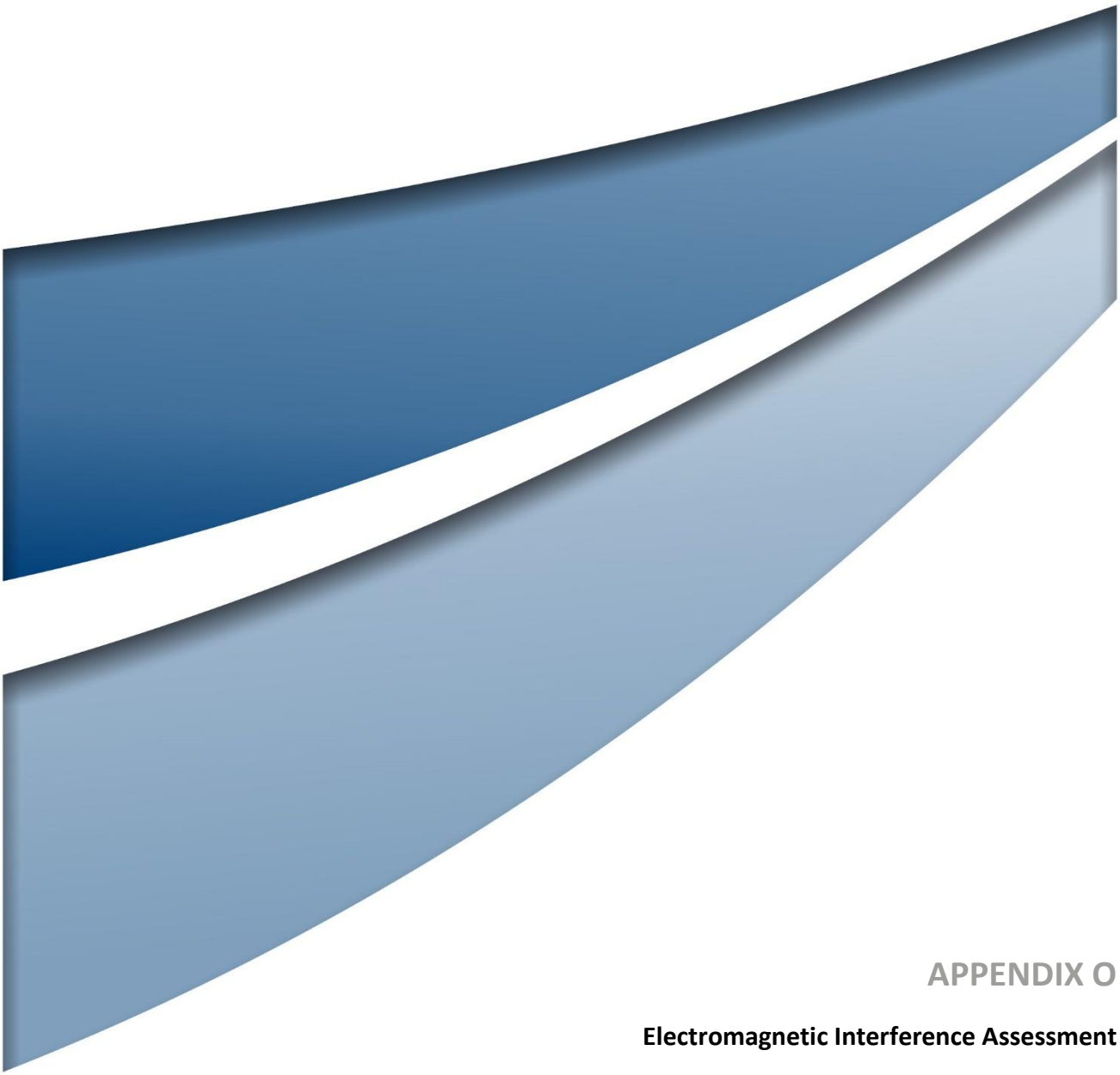
APPENDIX M

Bushfire Management Plan



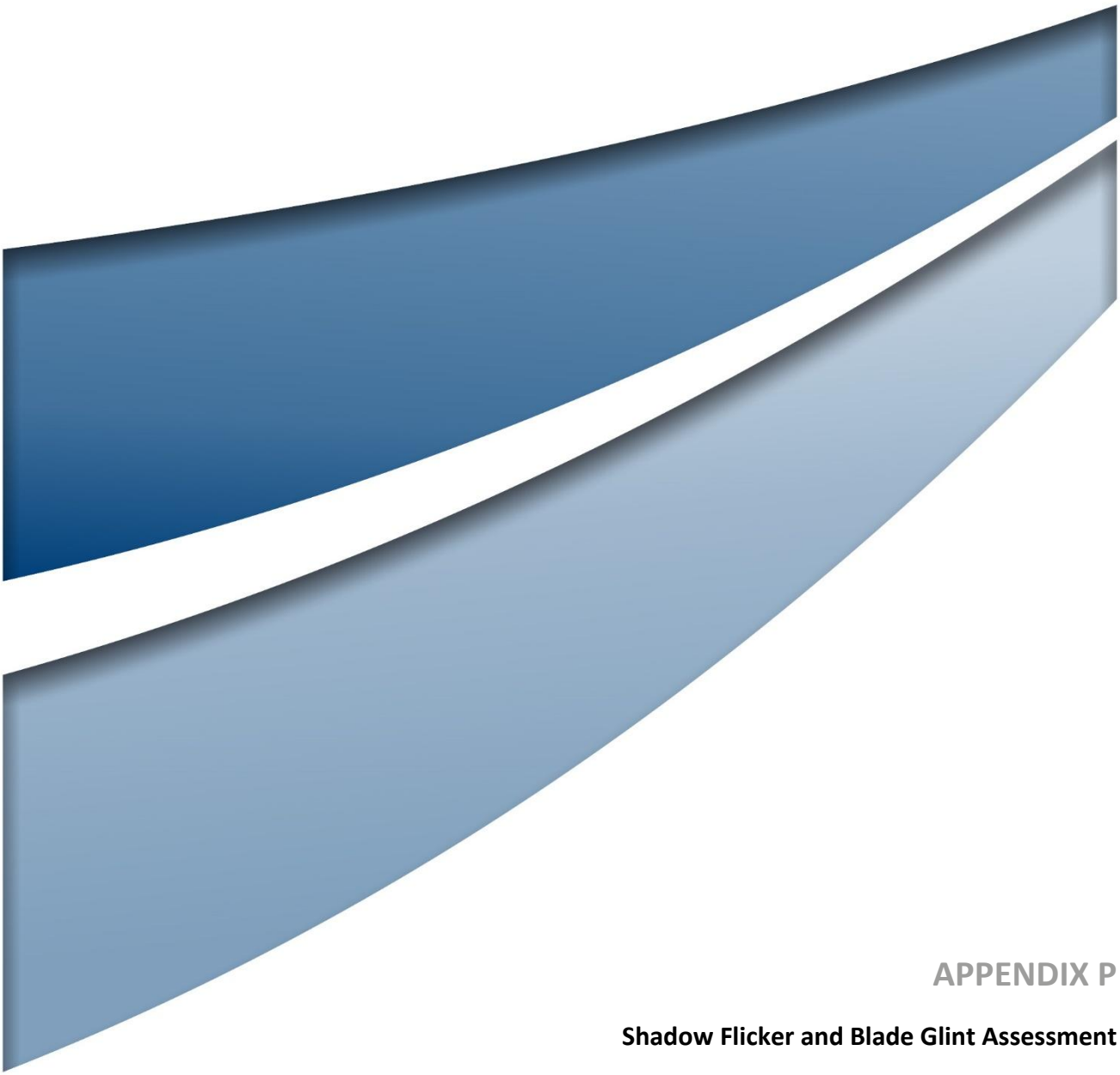
APPENDIX N

Bushfire Risk Report



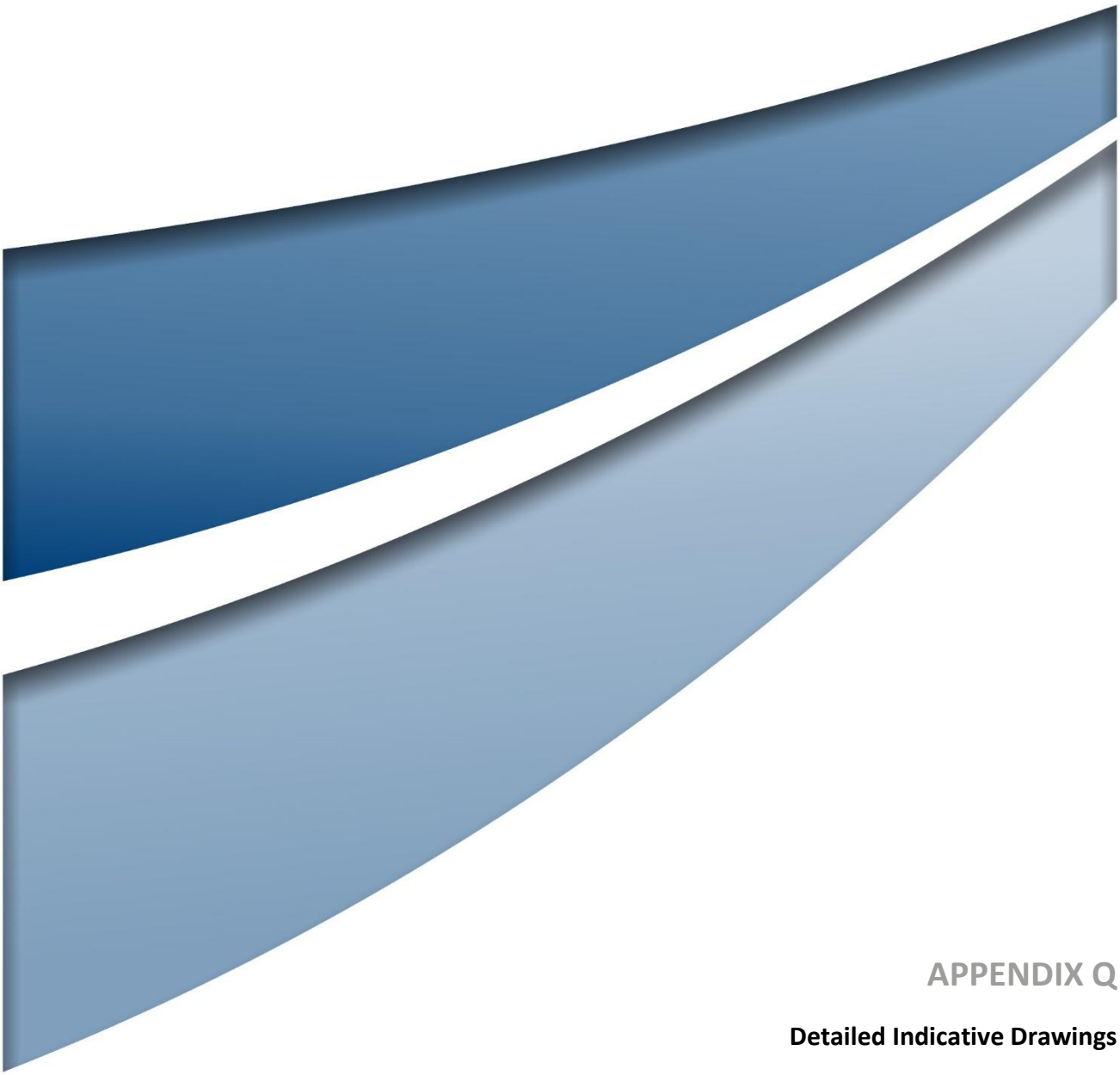
APPENDIX O

Electromagnetic Interference Assessment



APPENDIX P

Shadow Flicker and Blade Glint Assessment



APPENDIX Q

Detailed Indicative Drawings

umwelt

umwelt
Environmental & Social
Consultants

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