

Our Ref: 24-079

2 April 2026

Mr Louis Fouche
 Executive Manager Development Services
 PO Box 676,
 JURRIEN BAY WA 6516

By email: Louisf@dandaragan.wa.gov.au

Dear Louis,

PROPOSED AMENDMENTS: PARRON WIND FARM DEVELOPMENT APPROVAL (DA131 / 24)

Further to our recent discussions and following ongoing detailed design, we are pleased to submit the enclosed application seeking approval for minor amendments to development approval (DA131/24) relating to the Parron Wind Farm (PWF). This letter outlines the justification for the proposed amendments and provides an assessment against the applicable planning framework. It is supported by:

- An amended development approval application form signed by the landowner and Certificates of Title for the PWF site attached at **Appendix A**.
- An amended Development Plan attached at **Appendix B**.
- Elevations and floor plans for ancillary infrastructure including the substations and switchyards, hardstand design, Operations & Management (O&M) facility and concrete batching plant attached at **Appendix C**.
- An amended Environmental Assessment and Management Plan (EAMP) consistent with the proposed modifications attached as **Appendix D**.
- An amended Bushfire Management Plan (BMP) consistent with the proposed modifications attached as **Appendix E**.
- An amended Noise Impact Assessment (NIA) consistent with the proposed modifications attached as **Appendix F**.
- A Water Management Strategy consistent with the requirements of Condition 12 of DA131/24 attached as **Appendix G**.
- A Decommissioning and Land Rehabilitation Plan consistent with the requirements of Condition 13 attached as **Appendix H**.
- A Fauna Management Plan consistent with the amended EAMP and prepared in response to requirements of Condition 16 of DA131/24 attached as **Appendix I**.

The requisite application fee of \$295 will be paid upon receipt of an invoice made payable to Zephyr Energy Pty Ltd.

Background Information - Parron Wind Farm Development Approval

The Shire of Dandaragan conditionally approved the PWF at its Ordinary Council Meeting of 20 December 2024, confirmed in the Notice of Determination issued on 6 January 2025. The approved development includes:

- 79 x Vestas V162 6.2MW WTGs with a hub height of 149m, a blade radius length of 81m, and a total blade tip height of 230m, measured from ground level.
- The maximum output capacity of the PWF is 489.8MW.
- Permanent ancillary infrastructure:
 - A power substation with a nominated capacity of 200m x 210m and a switching station of 150m x 200m required for connecting into the existing public transmission line.
 - A BESS facility.
 - An O&M facility, which will include an office building and storage (compound) area.
 - Overground and underground electrical reticulation cabling requirements, which will be co-located within the internal access tracks.
 - Internal access tracks composed of crushed rock pavements over earth fill subbase. The tracks are indicatively 5.5m wide with a 0.5m shoulder each side and additional 2.5m-wide area for cable installation.
- Temporary ancillary development used during the construction phase of development includes:
 - Laydown area including turbine and blade hardstand, which will be used to store infrastructure ahead of installation.
 - Three (3) temporary concrete batching plants, with a footprint of approximately 100m x 100m in size. These will be operated at different points of the site, to support the installation of the WTG.
 - Temporary construction infrastructure and facilities including site offices, construction food halls, ablutions, power and water supply, storage/laydown, parking and access points.

The approved development plan is provided in Figure 1.

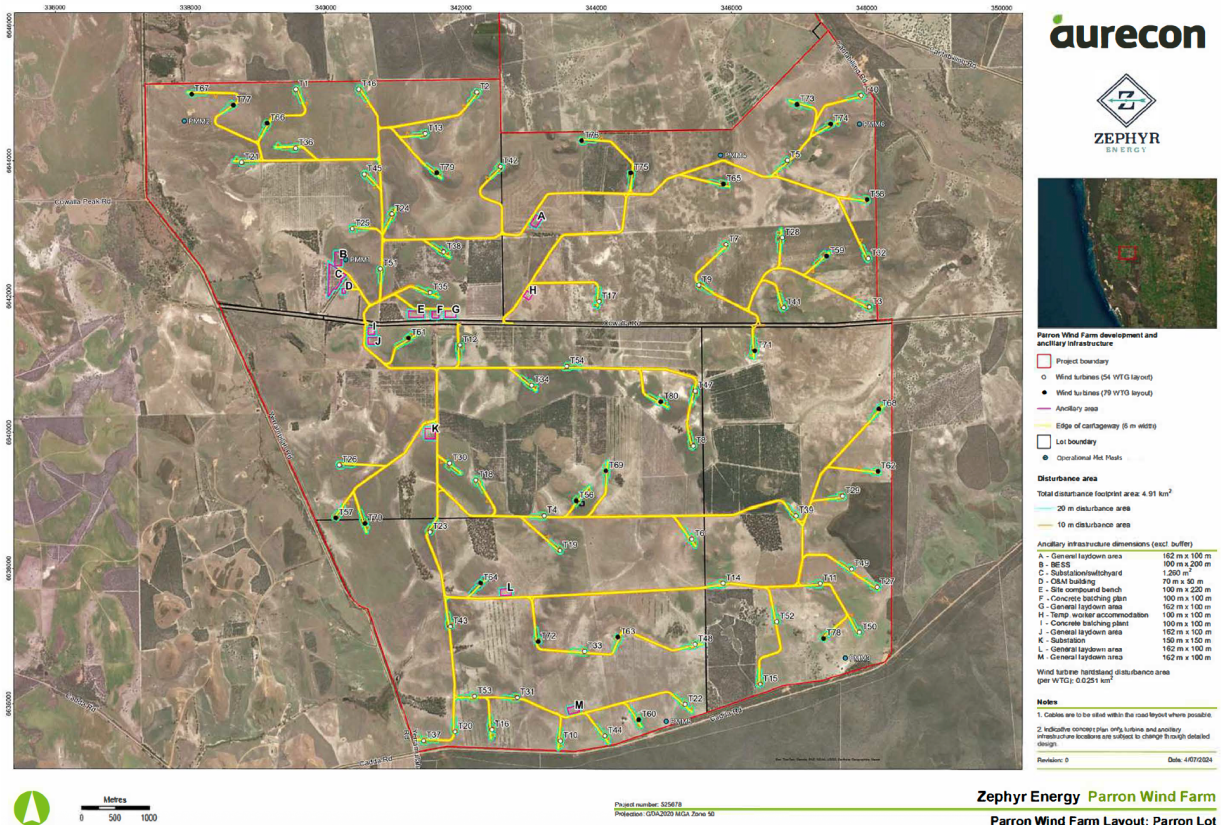


Figure 1: Approved Development Plan

DA131/24 - Existing Conditions of Development Approval

The approved development is required to satisfy various conditions. The following conditions are relevant to this proposed amendment application:

- Condition 1:** This development approval is valid until 12 December 2029. If the development is not substantially commenced within this period, the approval shall lapse and be of no further effect.
- Condition 2:** All development shall occur in accordance with the approved plans unless varied by a condition of approval or a minor amendment, to the satisfaction of the Shire of Dandaragan.
- Condition 3:** The approved wind turbines may be micro-sited within a 300 m radius of the turbine locations on the endorsed development plans. Prior to the commencement of construction, amended development plans, including the final siting of wind turbine.
- Condition 10:** Noise from the operational approved development shall not exceed more than 5dB(A) above the background noise level or 35dB(A) (using LA90), whichever is the greater, at surrounding noise sensitive premises located outside the approved development boundary unless the noise sensitive premises is the subject of a neighbour waiver agreement with the relevant landowner, for which 30dB(A) indoors and 45dB(A) outdoors shall not be exceeded.
- Condition 12:** Prior to the commencement of construction, Surface Water Management Plans (applicable for the construction and operational phase of the project) that incorporates appropriate design methods to manage water erosion from intense summer and/or winter

rainfall events, shall be submitted to and approved by the Shire of Dandaragan in consultation with the Department of Primary Industries and Regional Development.

Condition 13: Prior to the commencement of construction, a Land Rehabilitation Plan is to be submitted to and approved by the Shire of Dandaragan in consultation with the Department of Primary Industries and Regional Development, to address the rehabilitation of agricultural land after initial construction. The Decommissioning and Land Rehabilitation Plan is to be implemented to the satisfaction of the Shire of Dandaragan.

Condition 16: The applicant is to implement to the satisfaction of the Shire of Dandaragan the approved Environmental Assessment and Management Plan prepared by Emerge Associates and dated October 2024 for the life of approved development.

Condition 17: The applicant is to implement to the satisfaction of the Shire of Dandaragan the approved Bushfire Management, Risk Management, and Bushfire Emergency Response Plans prepared by Emerge Associates and dated October 2024 for the life of approved development.

Proposed Amendments to DA131/24

A series of minor amendments, largely resulting from detailed design and ongoing stakeholder engagement, are proposed to the approved PWF layout under DA131/24.

The amended Development Plan is provided below in Figure 2 and Appendix B. An explanation of the proposed amendments is set out below.

Refer to Figure 3 – Development Plan and Appendix B.

Micro-siting

Following the grant of development approval, the layout has undergone detailed design resulting in micro-siting adjustments to the number, referencing and location of WTGs. Under the PWF Development Approval, Condition 3, turbines and associated infrastructure may undergo micro-siting up to 300 m. The overall number of WTGs has been reduced from 79 to 78, due to the deletion on Turbine 66. The numbering of WTGs has also been slightly modified. *Table 1 – Summary of WTG Micro-siting Rationale* confirms the current WTG referencing and summarises rationale for WTG micro-siting changes. It also demonstrates micro-siting has occurred within 300 m in compliance with Condition 3.

Refer to Table 1 -Summary of WTG Micro-siting Rationale

WTG micro-siting generally arises from a combination of factors including:

- Updated energy modelling.
- Updated construction advice from Vestas.
- Achievement of a 230 m (tip height) setback to property boundaries and Cowalla Road to avoid private property and public infrastructure damage.
- Avoidance of easements to the existing transmission lines (516 m offset to the 132kV, and 521 m offset to the 330kV); and
- Ongoing protection of Matters of National Environmental Significance (**MNES**).

No. of WTGs proposed	WTG ID	Distance moved (m)	WP Assets	MNES Identified Areas	Cultural Heritage Identified Areas	Telecom Corridor	Cowalla Rd	Southern Boundary/ Badgingarra National Park (Yued)	North & East Property Boundary	Additional Neighbour Request	Parron Own Micrositing Requirement
1	T1	286	WP clearance assets						Property Bounda	Additional Neighbour Request	
2	T2	55							Property Bounda		
3	T3	288				Telecomm Corridor	Cowalla Rd		Property Boundary		
4	T4										
5	T5										
6	T6										
7	T7	226									Own Micrositing
8	T8	40									Own Micrositing
9	T9	148									Own Micrositing
10	T10	112						Southern Boundary			
11	T11	204									Own Micrositing
12	T12	59									Own Micrositing
13	T13	146									Own Micrositing
14	T14	273		MNES							
15	T15	132		MNES				Southern Boundary			
16	T16	89						Southern Boundary			
17	T17										
18	T18	177									Own Micrositing
19	T19	58									Own Micrositing
20	T20	105			For Bibby Creek Tributary			Southern Boundary			
21	T21	208									Own Micrositing
22	T22	33						Southern Boundary			
23	T23										
24	T24	89									Own Micrositing
25	T25	162	For WP clearance assets								
26	T26	229	For WP clearance assets								
27	T27	188		MNES					Property Boundary		
28	T28	69				Telecom Corridor					
29	T29	119		MNES							
30	T30										
31	T31										
32	T32	123							Property Boundary		
33	T33	149									Own Micrositing
34	T34	68									Own Micrositing
35	T35	140									Own Micrositing
36	T36	142	For WP clearance assets								
37	T37	137						Southern Boundary			
38	T38	40									Own Micrositing
39	T39										
40	T40	105							Property Boundary		
41	T41	13					Cowalla Rd				
42	T42	68		MNES							
43	T43	280			For Bibby Creek Tributary						
44	T44	106						Southern Boundary			
45	T45	170									Own Micrositing
46	T46	280	For WP clearance assets						Property Boundary	Additional Neighbour Request	
47	T47	146									Own Micrositing
48	T48										
49	T49										
50	T50										
51	T51										
52	T52	175				Telecommunications Corridor					
53	T53										
54	T54										
55	T56	43									Own Micrositing
56	T57	234	For WP clearance assets		For Hill River Tributary						
57	T58	108							Property Boundary		
58	T59	105									Own Micrositing
59	T60	114						Southern Boundary			
60	T61	143					Cowalla Rd				
61	T62	228		MNES					Property Boundary		
62	T63	214									Own Micrositing

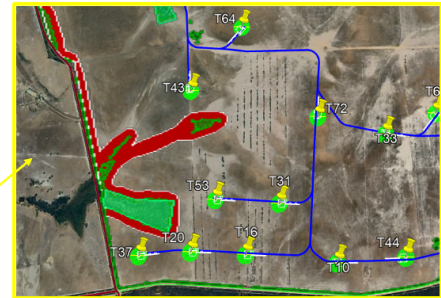
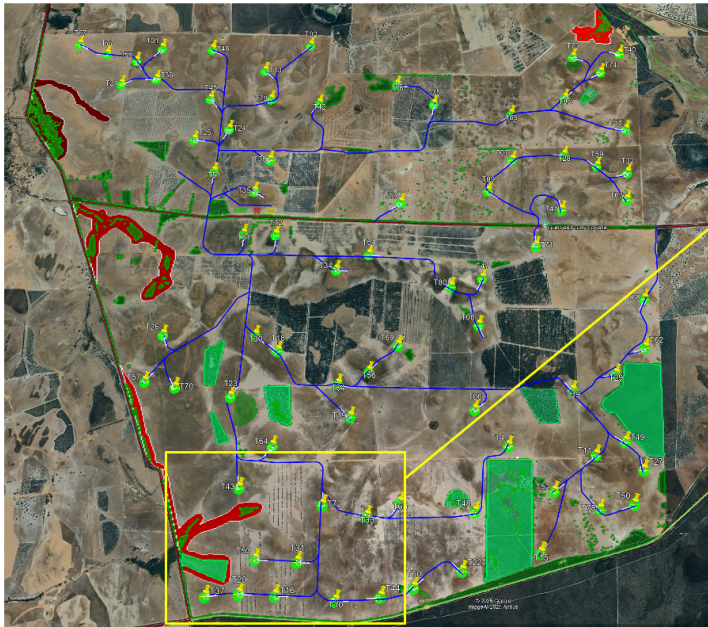
No. of WTGs proposed	WTG ID	Distance moved (m)	WP Assets	MNES Identified Areas	Cultural Heritage Identified Areas	Telecom Corridor	Cowalla Rd	Southern Boundary/ Badgingarra National Park (Yued)	North & East Property Boundary	Additional Neighbour Request	Parron Own Micrositing Requirement
63	T64	163									Own Micrositing
64	T65	121									Own Micrositing
65	T67	78							Property Boundary		
66	T68	45							Property Boundary		
67	T69										
68	T70	286	For WP clearance assets								
69	T71										
70	T72	68									Own Micrositing
71	T73										
72	T74										
73	T75										
74	T76	120							Property Boundary		
75	T77	202									Own Micrositing
76	T78										
77	T79	20									Own Micrositing
78	T80	110									Own Micrositing

Furthermore, micro-siting was also undertaken in response to the requests and recommendations of the 2025 Yued Cultural Heritage Survey report including:

- Recommendation 6 (a) and 6 (b) Bibby Creek: southern access track and turbine modified to avoid tributary.

Parron Wind Farm – Bibby Creek Avoidance

Recommendation 6a & 6b



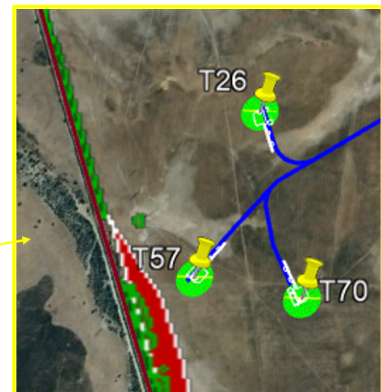
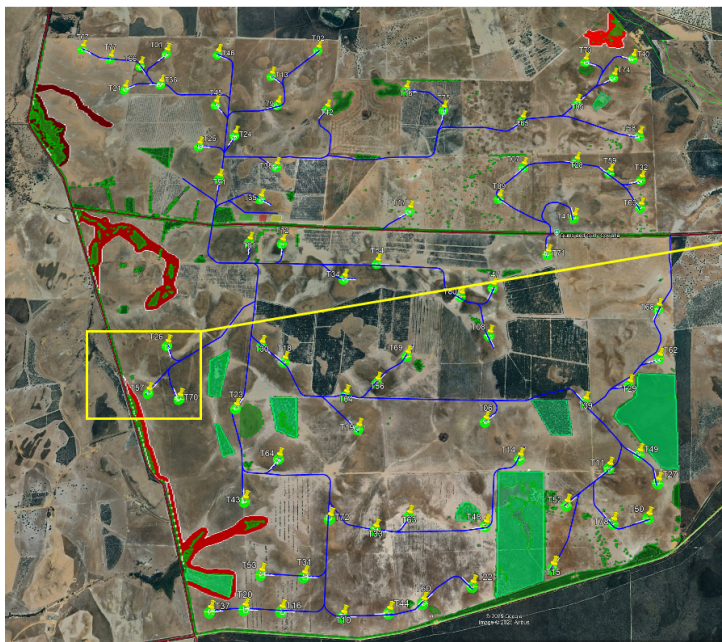
Layout Amendments:

- As per Recommendation 6a - the southern proposed access corridor track (in blue) has been re-routed so that it does not intersect the Bibby Creek Tributary.
- As per Recommendation 6b - Turbines T20 & T43 micro-siting has been undertaken to determine the turbine coordinate locations, as shown above. Hence, the full 300m radius allowance as presented in Map 6 of the draft Heritage Survey Report is no longer necessary. Therefore, the expected construction disturbance area will not intersect the Bibby Creek Tributary.

- Recommendation 6 (c) Hill River: Turbine micro-siting undertaken to avoid tributary.

Parron Wind Farm – Hill River Avoidance

Recommendation 6c



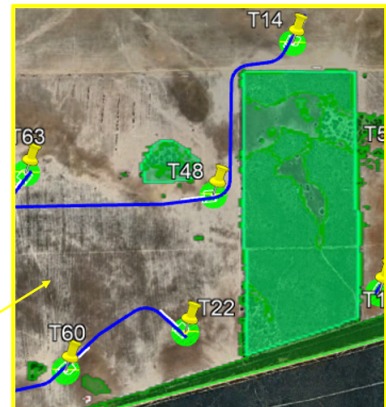
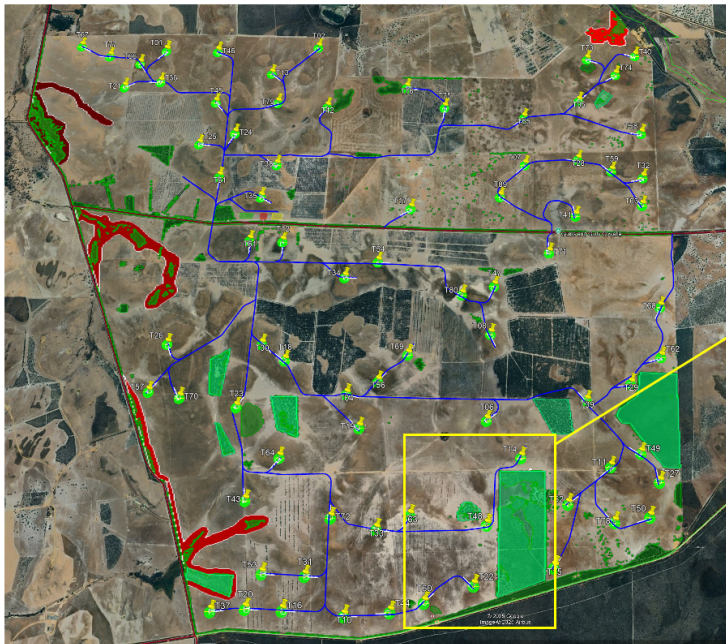
Layout Amendments:

- As per Recommendation 6c - Turbines T57 micro-siting has been undertaken to determine the turbine coordinate location, as shown above. Hence, the full 300m radius allowance as presented in Map 5 of the draft Heritage Survey Report is no longer necessary. Therefore, the expected construction disturbance area will not intersect the Hill River Tributary.

- Recommendation 6 (d) and (e): Moodjar Trees: Turbine micro-siting undertaken and turbines relocated to avoid identified Moodjar Trees

Parron Wind Farm – Moodjar Trees Avoidance

Recommendation 6d & 6e



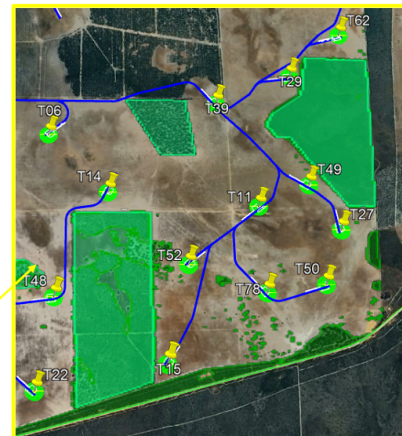
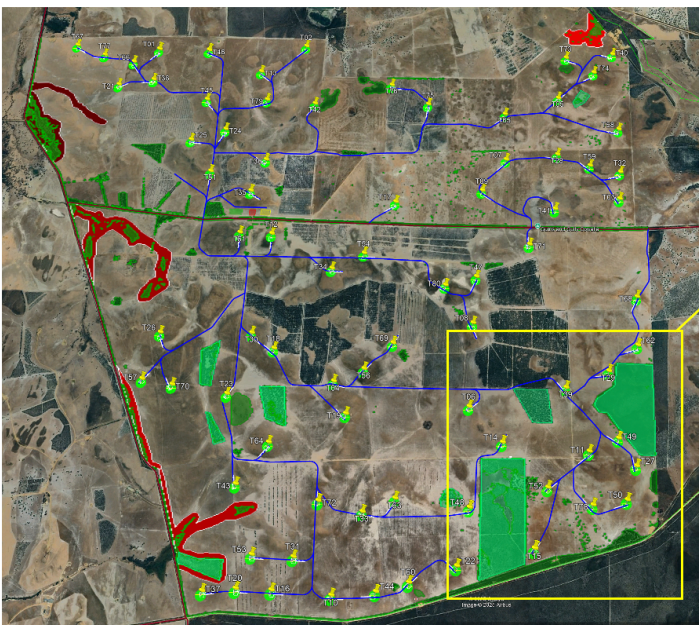
Layout Amendments:

- As per Recommendations 6d & 6e - Turbines T14 & T60 micro-siting has been undertaken and the turbines have been relocated away from the identified Moodjar Trees. Subsequently, the full 300m radius allowance as presented in Maps 8 & 9 of the draft Heritage Survey Report is no longer necessary. Therefore, the expected construction disturbance area will not interfere with the Moodjar Trees.

- Recommendation 10 (a) and (b) MNES: Turbine micro-siting undertaken and turbines relocated to avoid any identified MNES Avoidance Area

Parron Wind Farm – MNES Avoidance Areas

Recommendation 10a & 10b



Layout Amendments:

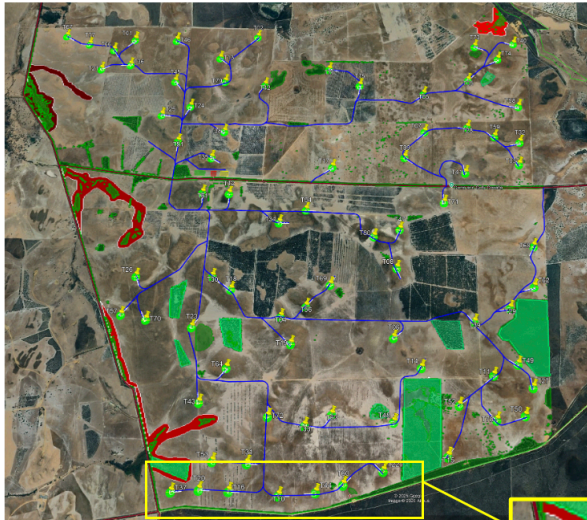
- As per Recommendation 10a – The Turbine locations have been micro-sited to avoid the MNES Avoidances Areas. Therefore, the expected construction disturbance area will not intersect the MNES Avoidances Areas.
- As per Recommendation 10b - Turbines T14, T15, T27, T29, T48, T49 & T62 locations have been micro-sited. Turbines T14, T15, T27, T29, T48 & T62 have been relocated to achieve at least 90m clearance from the identified MNES Avoidances Areas. Turbines T29 & T48 were already more than 90m away from the MNES Avoidances Areas, hence have remained unchanged. Therefore, the expected construction disturbance area will not intersect the MNES Avoidances Areas.

(Please Note: A clearance distance of 90m from the centre of the turbines to the MNES Avoidance Areas was discussed during the Heritage Survey site visit to be deemed acceptable)

- Recommendation 10 (c) Yued Aboriginal Corporation Request: Turbine micrositing undertaken and turbines relocated to maintain at least 250m clearance from the Southern Property Boundary.

Parron Wind Farm – Project Southern Boundary

Recommendation 10c



Layout Amendments:

- As per Recommendation 10c - Turbines have been relocated to maintain a clearance of at least 250m from the Southern Property boundary. To enable this clearance of at least 250m, Turbines T10, T15, 16, T20, T22, T37, T44 & T60 have been relocated north of their original locations.



Detailed Design

In addition, further amendments have arisen through detailed design. The proposed changes to the approval can be summarised as follows:

- Minor amended layout and dimensions for the WTG hardstand, access tracks and cables ancillary infrastructure. These include the addition of turnaround areas for each WTG with a buffer of 10 m.
- Ancillary infrastructure under the proposed amendment includes a construction workers accommodation facility, 2 x temporary concrete batch plant, O&M facility, construction compound and laydown areas. The number of concrete batch plants has reduced as has the area allocated to the workers accommodation facility including access (to 13 ha). The BESS is now co-located with the Western Power substation. Detailed elevations and site plans have been provided at Appendix C for the following ancillary infrastructure components:
 - Substations and switchyards for Western Power and PWF
 - O&M Facility
 - Temporary concrete batching plant

A building permit is not required for the temporary concrete batching plant, however, detailed plans are included in this submission in the event a development approval is required. A building permit is anticipated for the Operations and Management Building and Workers Accommodation facility.

- New elements of the design and associated assumptions include:
 - Total disturbance area is now 550.068 ha which is approx. 59.068 ha or around 12% greater than the disturbance area original shown. The proposed disturbance area is

addressed in the amended EAMP and has been carefully designed to avoid and minimise impacts on local environmental values.

- The inclusion of an additional substation (one now for Western Power and one for PWF). The Western Power substation has a 10m buffer to the north and new facilities have been provided for this substation including:
 - Additional hardstand
 - Site office
 - Two (2) x borrow pits (1 ha each)
- A new 330 kV transmission line is provided between the two substations along with a 6 m buffer.
- A new 50 m x 50 m area allocated for the production bore and any associated infrastructure, with a 12 m wide access track.
- Five (5) x new borrow pits (2.74 ha each) with a 4.5 m buffer to allow for a 1:3 batter, with 12 m wide access track disturbance.
- Two (2) new borrow pits (0.5ha each) with 12 m wide access track disturbance.
- New Cowalla Road crossovers (A to F) and electrical infrastructure (circuits and transmission lines). Detailed civil drawings are being separately prepared in order to satisfy the requirements of Condition 4, being:

Prior to the commencement of construction, detailed design drawings for any upgrades to site access and associated roadworks (including drainage and signage) are to be submitted to and approved by the Shire of Dandaragan. Costs associated with the construction of road access and upgrades shall be borne by the proponent.

The crossovers proposed include:

- Crossover 1 – 4-way intersection with crossovers to the north and south, providing access to multiple WTGs, PWF substation/switchyard (A) and O&M building (F).
- Crossover 2 – Provide access to general laydown area (R), site compound bench (E) and concrete batching plant (G). No access to WTGs.
- Crossover 3 – 3-way intersection with crossover to the north, servicing Workers Accommodation facility and WTG 17 only.
- Crossover 4 – new crossover providing north and south access to WTG 09 and WTG 41 and WTG 71.
- Crossover 5 – new crossover providing direct and separate access to the Western Power Wind Farm Substation and BESS.
- Crossover 6 – existing crossover for separate access to the Western Power Substation.

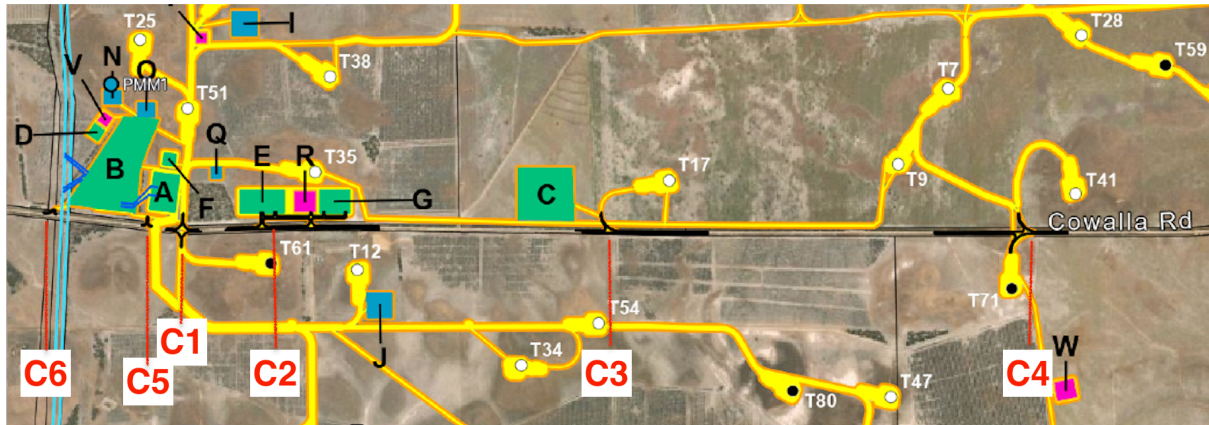


Figure 2: Proposed Crossovers

- Variations have been made to road/cable buffers, expanding the buffer to a minimum 12m disturbance corridor.
- Variations have been made to WTG hardstand buffers, now proposed at 37.7 m
- Variations have been made to other hardstands (laydown areas, O&M buildings, concrete batching plant, being a 20 m buffer).

No change to the scope of ancillary infrastructure components with cables, including Medium Voltage underground cables and 17 separate collector systems and no change is proposed to the type of turbine proposed to turbine specifications (V162 6.2MW).

A building permit is not required for the temporary concrete batching plant, however, detailed plans are included in the event a development approval is required. A building permit is anticipated for the Operations and Management Building and Workers Accommodation facility.

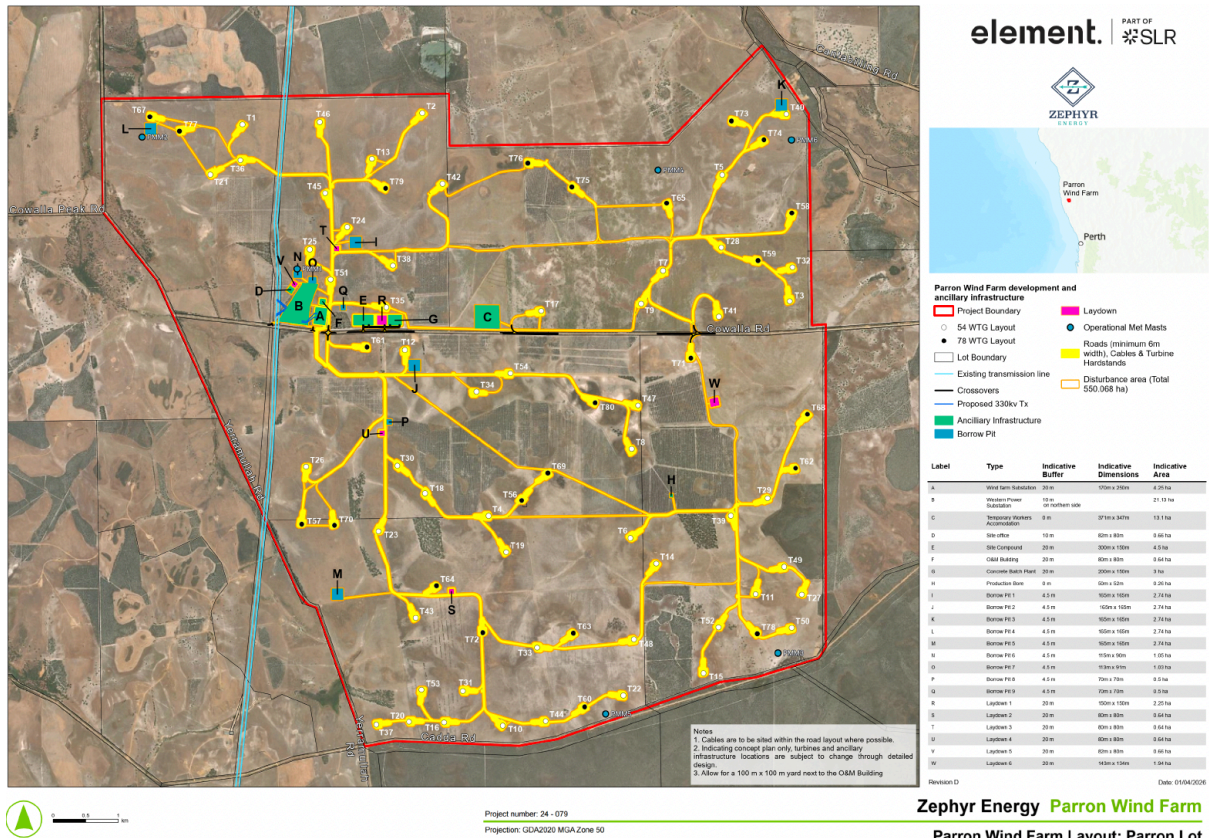


Figure 3: Amended Development Plan

Having regard to Conditions 10, 16 and 17, the proposed amendments affecting the layout of the proposed development are supported by refinements to the approved EAMP and BMP, attached as Appendix D and E respectively. It is also supported by an amended NIA attached as Appendix F.

Refer to Appendix D – Amended EAMP

Refer to Appendix E – Amended BMP

Refer to Appendix F – Amended NIA

Environmental Assessment Management Plan

The EAMP is the key supporting environmental document for the development application (DA), ultimately facilitating the consideration of environmental issues by the local government and various state government agencies and authorities.

It was originally submitted in October 2024 to support the Parron Wind Farm DA that was approved on 19 December 2024 (DA 131/24). An amendment to the current DA is now sought to reflect updates to the development layout and footprint. These proposed changes are addressed in the amended EAMP.

The amended PWF development layout has responded to site-specific environmental considerations and to avoid the need for impacts on intact native vegetation within the proposal area.

The amended EAMP provides an environmental assessment and management plan framework to be implemented across the site during development and operation of the proposed wind farm.

Key components of this framework remain:

- A *Construction Environmental Management Plan (CEMP)* to be prepared as part of the engineering detailed design that will consider landform, soils and geology, and to mitigate the risk of soil erosion.
- A *Water Management Strategy (WMS)* to be prepared to identify the site-based water management approach to support the CEMP.
- *Groundwater abstraction* for the proposed development will be undertaken in accordance with an approved groundwater licence.
- *Flora and vegetation management* will include the avoidance of clearing any intact native vegetation and black cockatoo habitat trees through micro-siting of wind turbines, delineation of tree protection zones (**TPZ**), and hygiene protocols to limit the spread of declared weeds and pathogens.
- *Curtailment protocols* to be considered if required (i.e. turning off wind turbines when wind levels are low and are at speeds that are less profitable or at particular periods of high risk (e.g. dawn and dusk)).
- *Wind farm construction and service vehicle speeds* to be kept low, to avoid collision impact on native fauna.

The amended EAMP is further supported by the additional plans and strategies which have been prepared in response to Condition 12, 13 and 16.

- Water Management Strategy (Condition 12)
- Decommissioning and Land Rehabilitation Plan (Condition 13)
- Fauna Management Plan (a requirement of the amended EAMP under Condition 16)

These reports have been prepared in order to clear the respective conditions, which it is understood to be a task Council officers can manage under delegation from the Council. The documents are included at Appendix G, H and I respectively to support the assessment of the amended EAMP.

Bushfire Management Plan

The BMP demonstrates that compliance with the acceptable solutions provided in respect of Bushfire Protection Criteria (BPC) under SPP 3.7 Bushfire and the associated Guidelines, particularly Criteria 7 - Development - Commercial and industrial and Criteria 8 - Development – Vulnerable tourism land uses and day uses.

Compliance under SPP3.7 is achieved through:

- *Location*: The proposed wind farm turbines and key infrastructure are within a moderate bushfire hazard, and all turbines and habitable buildings associated with the development can be located within a BAL-29 classification.
- *Siting and Design*: As required by SPP 3.7 and the Guidelines, all future habitable buildings can be sited within the site so that BAL-29 or less can be achieved. The required APZ is accommodated wholly within the site and existing cleared areas and where trees are present, these can remain. A minimum 10 m-wide APZ is proposed around all turbines and key infrastructure (excluding the roads). No existing native vegetation is required to be cleared or modified for bushfire purposes.
- *Vehicular Access*: The internal track network (considered private driveways for the purpose of assessment) is designed to provide access to Cowalla Road which runs through the centre of the site, ensuring connectivity to the broader public road network.

The track network also provides for interconnected access throughout the site, linking each turbine, substation, habitable building and laydown area. The internal driveway network has been designed to address the requirements of Table 10 of Appendix B.3, with a trafficable surface of 6 m provided throughout to allow for two-way traffic movements. Where applicable,

turnaround areas compliant with Figure 30 of Appendix B.3 have been incorporated, with internal intersections providing additional areas for turnaround. All proposed habitable buildings are located adjacent to internal loop roads, ensuring that they satisfy the functional consideration of providing turnaround areas within 30 m of habitable buildings, thereby enhancing accessibility and safety.

- **Water:** All development is to have water available to defend from bushfire. The development is not serviced by a reticulated water supply but will include the provision of a water system including a 100 000L water tank to be available for firefighting. Water tankers and other firefighting equipment will also be maintained as a part of the development.

Noise Impact Assessment

The amended NIA similarly concludes that existing dwellings on neighbouring sites are appropriately separated to the PWF (1.5km from turbines) to avoid amenity impacts. Neighbour agreements are in place with affected landowners of sensitive receptors who are recognised as ‘Stakeholder premises’ under the South Australian guidelines Environmental Protection Authority – Wind Farms Environmental Noise. A Noise Mitigation Plan (**NMP**) is to be prepared under Condition 11 of the development approval which will guide the operation of the wind farm over the project’s lifespan. The NMP will be provided to the Shire separately to enable clearance of this condition.

Planning Considerations

The following matters are relevant to the consideration of the proposed amendments to Development Approval DA131/24.

Property and Landowner Details

No changes are proposed to the PWF site which includes Lots 3738, 3739, 3742, 3743 and 3744 in the Badgingarra and Hill River localities. Refer to Figure 3 – Subject Site Plan.

These lots continue to remain in freehold ownership by Brogate Pty Ltd. The proposed PWF footprint will continue to occupy a relatively small portion of the subject site, which has a site area of approx. 8,392 ha. Accordingly, the PWF, as amended, will continue to support ongoing complementary agricultural land use on the site during the PWF construction and operation.

The property details related to the subject site are summarised below in Table 2. Certificates of Title are provided in Appendix A along with a signed Development Application form.

Refer to Appendix A - Certificates of Title and DA application form.

Table 2: Subject Site Property Details

Lot	Plan	Volume	Folio	Street Address	Registered Proprietor	Land Area
3738	207066	1687	897		Brogate Pty Ltd	17,365,304 m ²
3739	207069	2125	562		Brogate Pty Ltd	14,630,266 m ²
3742	207066	508	160A	2446 Yerramullah Road, Hill River 6521	Brogate Pty Ltd	17,103,887 m ²
3743	207069	69	37A		Brogate Pty Ltd	18,225,507 m ²
3744	207069	2125	563		Brogate Pty Ltd	16,595,051 m ²

- the original disturbance area was generated at the DA conceptual stage and prior to the completion of detailed design which has improved the efficiency of the design.
- The disturbance area represents disturbance during construction and operation of the PWF.

The amendments will continue to ensure the PWF footprint and disturbance area avoids and minimises impacts to sensitive environmental values, and state and local public and private infrastructure. The amended proposal continues to achieve relevant policy objectives as confirmed by the amended EAMP and BMP and the additional supporting management plans.

The proposed changes therefore comply with scope of Condition 3 and expectations of a minor amendment, and can be supported under clause 77(1)(c) of the *Regulations*.

(ii) *State Planning Policy*

Importantly, no material changes have been adopted into the State Planning Policy Framework since the DA313/24 was approved in December 2024. Accordingly, the development continues to meet the relevant policy objectives and requirements as summarised below.

State Planning Policy 2.0: Environmental and Natural Resources Policy

- The proposal integrates renewable energy infrastructure with existing rural land uses, harnessing abundant natural wind resources to assist with WA's transition to green energy and providing a supplementary agricultural income.
- The proposal supports the state's Green Energy Transformation Strategy. It will provide energy into the SWIS, assisting the state's transition to renewable energy and achievement of net zero carbon emission targets and other climate change related goals.
- The proposed development has adopted an overarching avoidance strategy. WTGs, cables, access points, internal roads and support infrastructure have been conceptually designed to avoid areas of native vegetation and environmental values. The PWF is also well separated from recorded Aboriginal heritage sites as well as Hill River and Bibby Creek and the amended design incorporates recommendations of the 2025 Aboriginal Cultural Heritage Survey.
- An amended EAMP prepared in support of the proposed amendment is attached as *Appendix D*.

State Planning Policy 2.5 – Rural Planning

- The PWF development site is already approved as a wind farm development, with the land use being promoted under the Shire's Local Planning Strategy and the State Planning Strategy 2050.
- The PWF can harmoniously co-exist with rural activity on, and adjacent to, the development site. It will provide growth and economic security via a supplementary income to the existing landowners and further local and regional shared benefits under a Community Benefit Framework and neighbour agreements. The framework will ensure regional communities that are currently largely dependent on agriculture to promote economic growth in their region also benefit from the PWF development.
- The site is well suited to hosting the PWF given the large site area and relatively limited area of disturbance, low turbine density, the absence of landownership fragmentation and the grazing rather than broadacre farming use of the land.
- Noting the number of turbines has reduced by one (1) to 78, the arrangement of WTGs is acceptable given the large development site area which generally enables adequate separation to near neighbours and therefore avoids adverse amenity impacts, and relatively low turbine density.

- The proposal has been conceptually designed to avoid environmental values and recorded sites of heritage significance. It is reasonably recessed from property boundaries and public infrastructure including roads and transmission lines.
- An amended NIA prepared in support of the proposed amendment is attached as *Appendix F*.

State Planning Policy 3.7 – Bushfire

- An amended Bushfire Management Plan has been prepared in support of the proposal and is attached as Appendix E.
- Having regard to location, siting and design, vehicle access and water storage, the BMP demonstrates that compliance with the acceptable solutions provided in respect of Bushfire Protection Criteria (BPC) under SPP 3.7 Bushfire and the associated Guidelines, particularly Criteria 7 - Development - Commercial and industrial and Criteria 8 - Development – Vulnerable tourism land uses and day uses.
- An amended BMP prepared in support of the proposed amendment is attached as *Appendix E*.

WAPC Position Statement: Renewable Energy Facilities (2020)

- The proposal supports the position statement’s intention for the location and siting of renewable energy facilities in a manner that maximises the capture of wind, whilst also protecting landscape character, local amenity and avoiding the loss of native vegetation and areas of environmental value.
- Amendments to the design reflect the outcomes of engagement with Western Power and the Yued Aboriginal Corporation, and in particular responds to Aboriginal Cultural Heritage Survey recommendations.
- The amendments respect the conceptual design ethos, being informed by environmental flora and fauna studies and continuing to adopt an overarching avoidance strategy that avoids the loss of native vegetation and areas of environmental value. Refer to section 5.1 and 5.2 and Appendix D.

Draft Renewable Energy Planning Code

The State Government is planning to introduce reforms into the assessment of Renewable energy facilities in 2026 and has issued a Draft Renewable Energy Planning Code (REPC) to provide a consistent platform for wind farm development assessment. Whilst the draft REPC is a seriously entertained planning proposal, it has not completed advertising and revisions are expected. Furthermore, minor amendments are contemplated under the development approval, within the scaffolding provided under Condition 3, in addition to the scope allowed for under the Regulations. It is suggested that the proposed amendments remain consistent with the intent of the draft REPC given the large site area, increased WTG setbacks to roads, avoidance of sensitive environmental values, and limited impacts to proximate noise sensitive receptors.

Shire of Dandaragan Planning Scheme No. 7

The Shire’s Local Planning Scheme No. 7 (**LPS 7**) is the primary statutory control on development and land use in the Shire. The PWF development site is located in the Rural Zone under LPS 7, as are the surrounding lots to the north, east, and west. Badgingarra National Park lies to the south. There have been no consequential changes the Shire’s local planning scheme since the 2024 development approval, albeit the planning scheme is undergoing routine review.

In respect of the Rural Zone objectives, the proposed development will continue to assist with the diversification of traditional rural farming land uses, providing an alternative form of income generation

whilst contributing to the delivery of green energy production. The proposal will not interfere with the landowner's capacity to continue to utilise the land for livestock grazing.

The project will mitigate against land degradation, and loss of environmental values given:

- The long term productive agricultural land relative to the PWF development site area
- The consequent limited turbine density
- The project's overarching avoidance strategy
- The preparation of an environmental management plan and decommissioning and rehabilitation plan.

Shire of Dandaragan Local Planning Strategy

No changes have been made to the Shire's Local Planning Strategy. As such, the proposed development remains aligned with the long-term land use and development vision for the Shire under the Local Planning Strategy. The Local Planning Strategy recognises the Shire's capacity for renewable energy development and support for agricultural activities given conducive environmental characteristics (such as consistent sunlight and coastal winds) and proximity to the Perth Metropolitan Region.

Shire of Dandaragan Local Planning Policy

In July 2025, the Shire adopted Local Planning Policy (**LPP**) 9.14 – Renewable Energy Facilities. This is the only relevant change to the planning framework between the approval of DA131/24 and this proposed amendment.

This policy provides direction and guidance on the development of renewable energy facilities (such as wind and solar farms) under the Shire of Dandaragan LPS 7. The policy provides information regarding and is to be read in conjunction with the WAPC's Position Statement: Renewable Energy Facilities. The Policy applies to all renewable energy facilities proposed upon land within LPS 7.

Though LPP 9.14 is targeted towards new wind farm developments, the proposed amendment is still consistent with the policy's objectives given that:

- The PWF represents a responsible renewable energy development.
- Refinements are in line with micro-siting expectations provided for under Condition 3 of the development approval and have arisen through detailed design, as is typical for development projects.
- Modifications continue to maintain the project's established avoidance and minimisation strategy and integrates key project stakeholder feedback to optimise future operations whilst better protecting environmental and cultural heritage values, MNES, private property and public infrastructure.
- As demonstrated in the updated EAMP, BMP and NIA, the proposal continues to protect areas of visual, natural and heritage significance and ensure renewable energy facilities are appropriately and sensitively sited to mitigate any potential adverse impacts.

Orderly and Proper Planning

The proposed amendments are consistent with orderly and proper planning. The amendments represent the ongoing evolution of the project's detailed design phase, and include the net loss of one turbine and one (1) concrete batching plant, along with modifications to layout siting and dimensions

and detailed elevations and floor plans. The amendments are informed by ongoing stakeholder feedback and consolidate the project's overarching avoidance and minimisation strategy. This ensures the development will protect environmental and cultural heritage values, as well as provide for greater separation from public roads and private property boundaries, equivalent to the WTG tip height and within the overriding expectations of Condition 3 of DA131/24.

There are no material changes to the State and local planning framework that would prevent the approval of the proposed amendment. The proposed modifications will continue to ensure the development can co-exist harmoniously with existing livestock grazing activities and meets the objectives of the Rural Zone. The amended EAMP, BMP and NIA demonstrate impacts are marginal and can be appropriately managed and mitigated through careful siting and design and addressed as conditions of development. Whilst the REPC and LPP 9.14 are new additions to the local planning framework, they remain due regard considerations and the proposed modifications are aligned with the policy intent.

The progression of the proposed development through detailed design demonstrates the applicant's commitment to the project with substantial commencement under the approval remaining valid until 2029. The proponent is working to substantially commence the development in Q2 of 2026.

The proposal satisfies the objectives and requirements of the planning framework set out under the *Regulations*, LPS 7, the State's and Shire's Planning Strategy, including the SPPs, WAPC Position Statement on Renewable energy facilities, LPP 9.14 and the REPC.

Conclusion

The proposed amendments comprise a series of relatively minor modifications to the PWF development approval DA131/24. The modifications primarily relate to a reduction in the number of WTGs (to 78 WTGs) and WTG and related infrastructure micro-siting which has resulted from detailed design and ongoing stakeholder engagement, and as foreshadowed under Condition 3.

Detailed elevations and floor plans have been provided to further inform the ancillary infrastructure included in the approved Development Site Plan and is further supported by the enclosed updated EAMP, BMP and NIA, and supporting Fauna and Decommissioning and Land Rehabilitation management plans and Water Management Strategy.

The submission demonstrates the development will continue to achieve broad compliance with the State and local Shire's planning framework. The planning framework is largely unchanged since the DA131/24 was granted, other than the introduction of LPP 9.14 and the Draft REPC which principally targets new renewable energy proposals. That notwithstanding, this submission demonstrates the proposal complies with the intent of LPP 9.14 and the REPC. Accordingly, it is respectfully requested that the Shire approve the proposed amendments.

Yours sincerely
Element Advisory



Claire Willey
Principal - Planning

Appendix A: Amended development approval application form and Certificates of Title

Appendix B: Amended Development Plan

Appendix C: Ancillary infrastructure site plans and elevations for substations and switchyards, hardstand design, Operations & Management facility, concrete batching plant

Appendix D: Amended Environmental Assessment and Management Plan

Appendix E: Amended Bushfire Management Plan (BMP)

Appendix F: Amended Noise Impact Assessment (NIA)

Appendix G: Water Management Strategy

Appendix H: Decommissioning and Land Rehabilitation Plan

Appendix I: Fauna Management Plan