



Regional Joint Development Assessment Panel Agenda

Meeting Date and Time: Wednesday, 12 May 2021; 10am
Meeting Number: RJDAP/24
Meeting Venue: via Zoom

To connect to the meeting via your computer - <https://zoom.us/j/91248729677>

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This DAP meeting will be conducted by electronic means open to the public rather than requiring attendance in person.

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Attendance

DAP Members

Mr Ray Haeren (Presiding Member)
Mr Gene Koltasz (A/Deputy Presiding Member)
Mr Justin Page (Third Specialist Member)
Cr Noel Dew (Local Government Member, Shire of Waroona)
Cr Larry Scott (Local Government Member, Shire of Waroona)

Officers in attendance

Mr Rod Peake (Shire of Waroona)
Mr Greg Delahunty (Shire of Waroona)

Minute Secretary

Ms Adele McMahon (DAP Secretariat)

Applicants and Submitters

Mr Russel Slaughter (Alinta Energy)

Members of the Public / Media

Nil

1. Opening of Meeting, Welcome and Acknowledgement

The Presiding Member declares the meeting open and acknowledges the traditional owners and pay respects to Elders past and present of the land on which the meeting is being held.

In accordance with regulation 27(3A) of the *Planning and Development (Development Assessment Panel) Regulations 2011*, Mr Ray Haeren has been appointed as Presiding Member for this meeting.

This meeting is being conducted by electronic means open to the public. Members are reminded to announce their name and title prior to speaking.

2. Apologies

Mr Paul Kotsoglo (Presiding Member)
Ms Kanella Hope (Deputy Presiding Member)

3. Members on Leave of Absence

Nil

4. Noting of Minutes

Signed minutes of previous meetings are available on the [DAP website](#).



5. Declarations of Due Consideration

Any member who is not familiar with the substance of any report or other information provided for consideration at the DAP meeting must declare that fact before the meeting considers the matter.

6. Disclosure of Interests

| Member | Item | Nature of Interest |
|------------------|------|--|
| Mr Paul Kotsoglo | 8.1 | Impartiality Interest – As the Managing Director of Planning Solutions, and having read the following passage on pages 8 and 9 of the RAR, "that whilst Alinta and Alcoa have had a long and mutually beneficial commercial relationship over the past 15 years based on their reliance on each other's operations, the installation and operation of the BSS will entirely be outside of the framework of the commercial agreements between the parties", Planning Solutions acts for Alcoa. Whilst there is not direct relationship with this matter and Planning Solutions, for the integrity of the DAP process and the perception of the process and associated decision making. |

7. Deputations and Presentations

The Shire of Waroona may be provided with the opportunity to respond to questions of the panel, as invited by the Presiding Member.

8. Form 1 – Responsible Authority Reports – DAP Applications

8.1 Lot 701 on DP 59305 Willowdale Road, Wagerup

| | |
|--------------------------|---------------------------------------|
| Development Description: | Proposed Battery Storage System |
| Applicant: | Alinta Energy |
| Owner: | Alinta Cogeneration (Wagerup) Pty Ltd |
| Responsible Authority: | Shire of Waroona |
| DAP File No: | DAP/21/01947 |

9. Form 2 – Responsible Authority Reports – DAP Amendment or Cancellation of Approval

Nil



10. State Administrative Tribunal Applications and Supreme Court Appeals

| Current SAT Applications | | | | |
|----------------------------------|----------------|---|---|--------------------|
| File No. & SAT DR No. | LG Name | Property Location | Application Description | Date Lodged |
| DP/14/00039 DR 65/2020 | Shire of York | Lots 4869 (2256), 5931, 9926 (2948) and 26934 Great Southern Highway, St Ronans | Construction and Use of Allawuna Farm for the purposes of a Class II Landfill | 28 July 2020 |

11. General Business

In accordance with Section 7.3 of the DAP Standing Orders 2020 only the Presiding Member may publicly comment on the operations or determinations of a DAP and other DAP members should not be approached to make comment.

12. Meeting Closure

Willowdale Road, Lot 701 on DP 59305, Wagerup – Proposed Battery Storage System

Form 1 – Responsible Authority Report (Regulation 12)

| | | |
|--|---|--|
| DAP Name: | Regional JDAP | |
| Local Government Area: | Shire of Waroona | |
| Applicant: | Alinta Energy | |
| Owner: | Alinta Cogeneration (Wagerup) Pty Ltd | |
| Value of Development: | \$100 million <input checked="" type="checkbox"/> Mandatory (Regulation 5) <input type="checkbox"/> Opt In (Regulation 6) | |
| Responsible Authority: | Shire of Waroona | |
| Authorising Officer: | Anthony (Tony) Dowling | |
| LG Reference: | TP2195 | |
| DAP File No: | DAP/21/01947 | |
| Application Received Date: | 28 January 2021 | |
| Report Due Date: | 30 April 2021 | |
| Application Statutory Process Timeframe: | 90 days with an additional 14 days agreed | |
| Attachment(s): | 1. Location Map 2. Cadastre Map 3. Existing Development Plan 4. Proposed Site layout, Elevation and Section Drawings 5. Site Layout Overlain Aerial Image 6. Photograph – Hornsdale Wind Farm, SA 7. Photograph – Newman BSS (Pilbara) 8. Site Photographs 9. Copy EPA Approval for BSS 10. Copy Amended Ministerial Statement 729 11. Copies of Referral Agency Responses 12. Copy WPS Bushfire Emergency Response Plan | |
| Is the Responsible Authority Recommendation the same as the Officer Recommendation? | <input checked="" type="checkbox"/> Yes | Complete Responsible Authority Recommendation section |
| | <input type="checkbox"/> No | Complete Responsible Authority and Officer Recommendation sections |

Responsible Authority Recommendation

That the Regional JDAP resolves to:

1. **Approve** DAP Application reference DAP/21/01947 and accompanying plans (Attachments 4 and 5) in accordance with Clause 68 of Schedule 2 (Deemed Provisions) of the *Planning and Development (Local Planning Schemes) Regulations 2015*, and the provisions of the *Shire of Waroona Local Planning Scheme No. 7*, subject to the following conditions:

Conditions

1. Prior to the commencement of works, a drainage management plan is to be submitted to the Shire of Waroona for approval. The approved drainage management plan shall be implemented during construction.
2. Prior to operation of the battery storage system commencing, a detailed landscaping plan shall be submitted to the Shire of Waroona for approval which demonstrates vegetation, which once mature, will be sufficient to substantially screen the battery storage system from the existing access road into the Wagerup Alumina Refinery and the Wagerup Power Station.

The approved landscaping plan shall be implemented within 60 days of practical completion of the battery storage system and thereafter the vegetation shall be maintained in a healthy condition at all times to the satisfaction of the Shire of Waroona.

3. All vegetation not affected by the necessary site works associated with the development shall be retained.
4. This decision constitutes planning approval only and is valid for a period of 2 years from the date of approval. If the subject development is not substantially commenced within the specified period, the approval shall lapse and be of no further effect.

Details: outline of development application

| | |
|---|---|
| Region Scheme | Peel Region Scheme |
| Region Scheme - Zone/Reserve | Industrial |
| Local Planning Scheme | Local Planning Scheme No. 7 |
| Local Planning Scheme - Zone/Reserve | Special Industry |
| Structure Plan/Precinct Plan | Nil |
| Structure Plan/Precinct Plan - Land Use Designation | Nil |
| Use Class and permissibility: | <p>Use class - Public Utility</p> <p>Land use and development within the Special Industry Zone is restricted to the operations of the industry identified on Scheme Map</p> <p>(NB: The type of operating industry is not identified on the scheme map but presently comprises Alcoa's Wagerup Alumina Refinery and adjacent residue lakes, and Alinta Energy's Wagerup Power Station).</p> |
| Lot Size: | 7.3 hectares |
| Existing Land Use: | Power station (Wagerup Power Station) |
| State Heritage Register | No |
| Local Heritage | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Heritage List <input type="checkbox"/> Heritage Area |
| Design Review | <input checked="" type="checkbox"/> N/A <input type="checkbox"/> Local Design Review Panel <input type="checkbox"/> State Design Review Panel <input type="checkbox"/> Other |
| Bushfire Prone Area | Yes |
| Swan River Trust Area | No |

Proposal

The proposal is for the development and operation of a new 100 MW battery storage system (BSS) within Lot 701 on DP 59305 Willowdale Road in the locality of Wagerup (the 'subject site'), to augment the applicant's existing cogeneration power facility ('Wagerup Power Station' - WPS) located within that lot.

The proposed development will largely be a modular, containerised development with no moving parts, no air or odour emissions, and no significant noise-emitting components.

The proposed development principally comprises:

- Lithium-ion battery modules;
- Inverters which convert the direct current (DC) voltage produced by the batteries into alternating current (AC) electricity;

- Coupling transformers which provide an intermediate step up in voltage before the step up to transmission voltage;
- Step-up transformers which increase the voltage to 330kV which is required for transmission in Western Power's network;
- Control systems and ancillary equipment including a new control room and associated switchgear.

A location map overlain an aerial image of the subject site is provided at **Attachment 1** to this report. A cadastre map denoting the subject site and surrounding Lot 700 - being the site of Alcoa's Alumina Refinery - is provided at **Attachment 2** to this report.

An aerial image outlining existing development upon Lot 701 is provided at **Attachment 3** to this report. A detailed site layout, elevation and section drawings of the proposed BSS are provided at **Attachment 4** this report. The site layout overlain an aerial image of Lot 701 is provided at **Attachment 5** to this report.

The applicant has advised that the final layout of proposed BSS will depend on the selection of a supplier following a competitive tendering process and detailed design which will optimise integration with the existing assets.

It is likely that the proposed BSS will resemble the battery system that operates at the Hornsdale Wind Farm in South Australia which is of a similar magnitude. An aerial photograph of this development is provided at **Attachment 6** to this report.

The applicant has also developed a similar but smaller-scale 35 MW BSS at the Newman power station in the Pilbara region of WA. An aerial image of this power station is provided at **Attachment 7** to this report.

The purpose of the proposed BSS is to create an opportunity to provide more renewable and intermittent electricity generation for dispersal through the South West Interconnected System (SWIS) while maintaining power quality and system security. The ability of large batteries to respond instantly to fluctuations on the grid is critical to the development and operation of increased renewable energy in the state of Western Australia.

The applicant contends that the proposed development is entirely compatible with the State's strategies and objectives for energy security and reliability and makes effective use of existing industrial land.

Alinta Energy advises that the granting of development approval is a prerequisite for execution of an *Engineer Procure Construct* (EPC) contract.

Additionally, obtaining development approval, along with any other key consents and/or approvals for a project of this kind, is required to be in place prior to making a final investment decision.

Alinta Energy aims to commence construction of the BSS within the first quarter of 2022 and complete it within 12 months thereafter.

Background/Context

The applicant has provided an outline of the proposal in support of the application for development approval. Relevant excerpts from this outline have been reproduced within this report where relevant in order to detail and explain the proposal.

The subject site is located within the northern portion of Lot 701 and is presently undeveloped and is situated within a 'park-land' type setting as illustrated by a series of site photographs provided at **Attachment 8**.

The subject site has a relatively even grade rising from approximately 50m AHD in the west of the site to approximately 56m AHD in the east of the site.

Site access is via a two-way, sealed driveway off Willowdale Road.

Onsite parking for 20 vehicles is provided at the site entrance adjacent to the WPS site office available to permanent staff and visitors/contractors. Overflow car parking for up to 500 vehicles is also available opposite the WPS site across Willowdale Road in the contractor's carpark (shared with Alcoa).

The subject site adjoins the existing Wagerup Power Station (WPS) to the south which occupies the remainder of lot 701 (see **Attachment 3** to this report).

Through its wholly owned subsidiary, Alinta Cogeneration (Wagerup) Pty Limited, Alinta Energy owns and operates the WPS which is licenced to generate 380MW of electricity. The WPS can run on both natural gas and distillate (diesel) and is considered a 'peaking' power station which typically operates when there is high electricity demand in the SWIS. Up to six regular staff are onsite generally during business hours.

The existing operations are regulated by the Department of Water and Environmental Regulation (DWER) under operating licence L8174/2007/5 (valid to November 2034).

These operations were approved by Ministerial Statement 729 issued on 27 September 2006 pursuant to s45(5) of the *Environmental Protection Act 1986*. This Statement has been subsequently amended and recently approved by the Environmental Protection Authority (EPA) in order to accommodate the operations of the proposed BSS. A copy of the EPA approval letter is provided at **Attachment 9** to this report.

A copy of the amended Ministerial Statement 729 (Attachment 4 to the Statement) - which provides a succinct outline and summary of the current WPS operations and the proposed BSS – is provided at **Attachment 10** to this report.

The WPS also holds a Dangerous Goods Site Licence (DGS020775) authorising the storage and handling of bulk quantities of diesel fuel and smaller volumes hydrochloric acid and sodium hydroxide.

Although separately titled, Lot 701 sits wholly within the confines of Alcoa's Wagerup Alumina Refinery site, being Lot 700 on Plan 59305 (see cadastre map at **Attachment 2** to this report).

The Wagerup Alumina Refinery site is situated on the foot slopes of the Darling Scarp, and borders the South West Highway extending about 1.5 km inland. It lies approximately 10 km south of the Waroona town centre, and approximately 4 km north of Yarloop.

To its north and south is farmland whilst immediately to its east lies the Dwellingup State Forest. Immediately to its west and on the other side of the South West Highway is the refinery's residue lakes. Farmland also surrounds these lakes on its northern, western and southern sides. Most of the farmland surrounding the refinery site and the residue lakes is owned by Alcoa and acts as a buffer to the refinery operations and the residue lakes.

Legislation and Policy

Legislation

Peel Regions Scheme

Shire of Waroona Local Planning Scheme (LPS) 7

Planning and Development (Development Assessment Panels) Regulations 2011

Environmental Protection Act (WA) 1986

Environmental Protection Regulations (WA) 1987

Environmental Protection (Native Vegetation Clearing) Regulations (WA) 2004

Aboriginal Heritage Act 1972

Dangerous Goods Safety Act 2004

State Government Policies

State Planning Policy 2.1 – Peel Harvey Coastal Plain Catchment

State Planning Policy 3.7 – Planning in Bushfire Prone Areas

Structure Plans/Activity Centre Plans

Nil

Local Policies

Nil

Consultation

Public Consultation

As the proposed development will be consistent with the zone's purpose, is substantially smaller in scale to the adjacent WPS, is considered to be visually unobtrusive, and deemed unlikely to generate any adverse impacts upon the surrounding area in which it will be located, public advertising of the proposal was deemed unwarranted.

Referrals/consultation with Government/Service Agencies

The application for development approval was referred to the following State authorities/agencies for consideration and comment, identified as possibly having an interest in the proposal:

- Department of Water and Environmental Regulation (DWER)
- Department of Fire and Emergency Services (DFES)
- Department of Mines, Industry Regulation & Safety (DMIRS)
- Environmental Protection Authority (EPA)
- Western Power (WP)
- Dampier Bunbury Pipeline
- Peel Development Commission (PDC)

Four (4) responses were received to the application, being from DWER, DFES, DMIRS, and the Dampier Bunbury Pipeline. Copies of these are provided at **Attachment 11** to this report.

A summary of each of their responses follows.

Department of Water and Environmental Regulation (DWER)

[NB: At the time DWER received from the Shire of Waroona a copy of the development application for consideration and comment it had not received any application from the proponent to change or amend the works approval and/or licence applying to the existing WPS]

Advised that the proposed BSS is likely to trigger an amendment to Ministerial Statement 729 (referenced earlier in this report) and that the requirement for planning approval would only be forthcoming once an amendment to the Ministerial Statement had been approved.

It also advised that the proposed development will need to demonstrate compliance with the *Environmental Protection (Noise) Regulations 1997* and *Environmental Protection (Unauthorised Discharges) Regulations 2004*.

DWER also advised that it is likely that the proposed development will be exempt from the requirement to obtain a clearing permit pursuant to Regulation 5, Item 1 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (the Clearing Regulations) should planning approval be granted to the BSS as proposed.

It is noted that the vegetation to be cleared for the proposed development is parkland cleared, planted, non-native Eucalyptus trees. There are no mapped significant species or ecological communities present and on this basis there are no environmental related concerns raised with the proposed clearing.

Department of Fire and Emergency Services (DFES)

DFES advised that the site of the proposed BSS is located within an area that has been designated as a 'bushfire prone area' by the Fire and Emergency Services Commissioner and therefore compliance with relevant policy provisions of *State Planning Policy (SPP) 3.7—Planning for Bushfire Prone Areas* is required (eg. undertake and submit either a BAL assessment or prepare and submit a BAL contour

map of the subject site, identify any bushfire hazards arising as a consequence of the proposed development, and prepare and submit a bushfire management plan (BMP), for the subject site, particularly addressing compliance with SPP 3.7 policy measure 6.6 - *Vulnerable or High-risk Land Uses*.

DFES further advised that given the proposed development has the potential to increase the threat of bushfire to people, property and infrastructure, it is considered that it should not be supported until such time that the bushfire risk and hazard reduction measures are established and understood.

It recommended that determination of the development application be deferred to allow the proponent to submit the required information in accordance with SPP 3.7 and its associated Guidelines.

In response to this advice, the applicant contends that the proposed development is exempt from compliance with relevant bushfire planning provisions.

It advises that firstly, having regard to clause 78B (1)(b) in Schedule 2 of the *Planning and Development (Local Planning Schemes) Regulations 2015* the proposed development does not contain a habitable building nor a specified building and as such is an exempt development pursuant to Part 10A—Bushfire Risk Management of the aforementioned regulations.

Secondly, having regard to section 5 of WAPC *Planning Bulletin 111/2016*, the applicant contends that SPP 3.7 is not applicable to the proposed development.

Section 5 of the bulletin outlines developments which are exempt from the application of SPP 3.7 and includes development which will not:

1. Result in the intensification of development or land use;
2. Result in an increase of residents or employees;
3. Involve the occupation of employees on site for any considerable amount of time; or
4. Result in an increase to the bushfire threat.

In respect to matters 1-3 listed above, the applicant advises that the operation and maintenance of the proposed BSS will be managed by the team of Alinta employees currently managing the existing WPS located within the same allotment (Lot 701)—there is no proposed increase in personnel numbers at the site (except for during the construction period of the BSS which is expected to take approximately 12 months to complete).

During normal operations it is likely that 1–2 Alinta personnel will occupy a part of the proposed development for 1–2 hours to undertake routine checks and inspections.

There is no intention to include any proposed residential or habitable building within Lot 701.

In respect to matter 4 listed above, the applicant advises that there will be no increase in the bushfire risk with the addition of the proposed BSS.

The BSS infrastructure will be constructed entirely on concrete foundations set within a compacted bench. The development footprint will be cleared of existing vegetation during compaction of the bench and prior to construction of the BSS.

Additionally, all battery and inverter containers are to be fitted with individual fire suppression systems which are automatically triggered if continuous sensors in the container detect smoke or temperatures above the safe operating range. These fire suppression systems are designed to act early to prevent any damage to the asset.

Notwithstanding that the applicant contends the proposed BSS is exempt from complying with relevant bushfire planning provisions, the applicant has submitted with the development application a copy of its proposed *Bushfire Emergency Response Plan* for the WPS. A copy of this is provided at **Attachment 12** to this report.

Furthermore, as part of the Engineer Procure Construct (EPC) contract/procurement process (referenced earlier in the section titled Proposal in this report) for the detailed design and construction of the proposed BSS, the applicant will specify performance standards required of the BSS in respect to bushfire risk so that these can be developed through the detailed design process of the BSS.

The applicant has further advised that in subsequent consultation with officers of DFES, it was made clear to the applicant by DFES that it is at the discretion of the decision-making authority as to whether SPP 3.7 will apply.

The applicant has also consulted with the Bushfire Policy team at the Department of Planning Lands and Heritage (DPLH) who advised that given the nature of the proposed development it appears to fall within the exemption categories for SPP 3.7.

Department of Mines, Industry Regulation & Safety (DMIRS)

Advised that the WPS has a current Dangerous Goods Storage Licence which will require amendment should the proposed Battery Storage System be approved and implemented. The proponent advised in its development application that it would seek to amend this licence accordingly.

Dampier Bunbury Pipeline

Advised of no objection to the proposed development.

Design Review Panel Advice

No design review undertaken – deemed unwarranted as the design of the proposed development is considered consistent with and typical of industrial-type development.

Consultation with Alcoa Australia

Given that the subject land is fully surrounded by Lot 700 which is owned by Alcoa of Australia Ltd ('Alcoa'), a copy of the development application was referred to Alcoa for its consideration and comment. Alcoa did not respond to the invitation for comment on the proposed development.

The applicant advised that it has not engaged with Alcoa about the proposed development.

It has further advised that whilst Alinta and Alcoa have had a long and mutually beneficial commercial relationship over the past 15 years based on their reliance on each other's operations, the installation and operation of the BSS will entirely be

outside of the framework of the commercial agreements between the parties. Alinta advise that the BSS will be installed and operated while having no adverse impact on the ability for Alcoa to continue their operations and within all existing permissions and rights held by Alinta.

Nevertheless, Alinta is prepared to work with Alcoa on practical matters and logistics as required during the implementation of the BSS.

Planning Assessment:

Peel Region Scheme

Whilst Lot 701 is included within the *Peel Region Scheme* (PRS) scheme area the proposed use is exempt from obtaining planning approval pursuant to the PRS as it is not reserved land, it does not fall within any designated Special Control Area (SCA), nor does any PRS clause 21 resolution apply to it.

(Exemption from planning approval pursuant to the PRS was confirmed by the Department of Planning Lands and Heritage (DPLH) in an email to the Shire dated 16 April 2021).

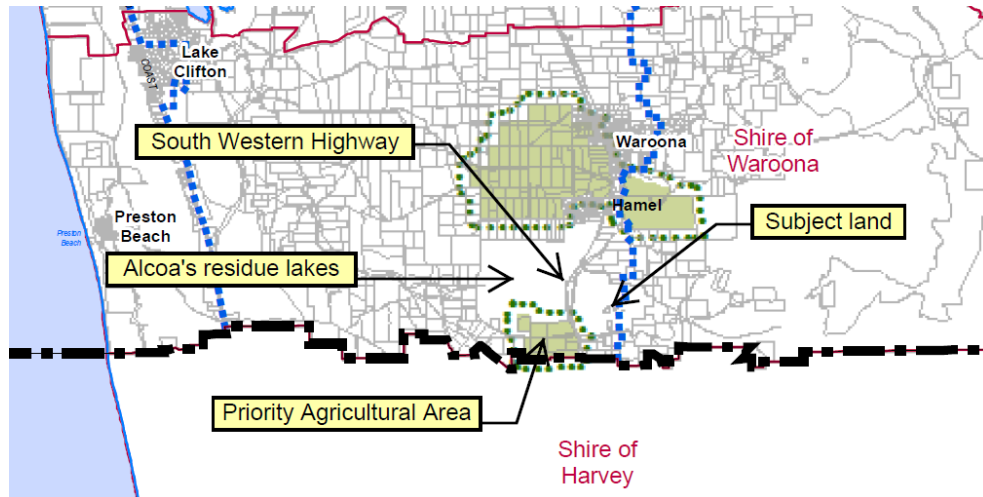
In any event, is contended that the proposed development will – in a small way – assist in the achievement of the following aims of the scheme:

- Clause 6 (a) - promote the sustainable development of land taking into account relevant environmental, social and economic factors; and
- Clause 6 (e) - provide for industrial development in planned estates where land use conflicts and environmental impacts will be minimised and efficient production facilitated.

It is noted that the PRS does not prescribe any particular development standards or provisions for industrial development against which the proposed development can be assessed. Neither do any of the scheme's planning policies apply to Lot 701, including the PRS *Priority Agricultural and Rural Land Use Policy* and its *Strategic Minerals and Basic Raw Materials Resource Policy*.

The *Priority Agricultural and Rural Land Use Policy* requires development proposed to be located within close proximity (generally up to 500 metres) to Priority Agricultural Land to obtain planning approval under the PRS.

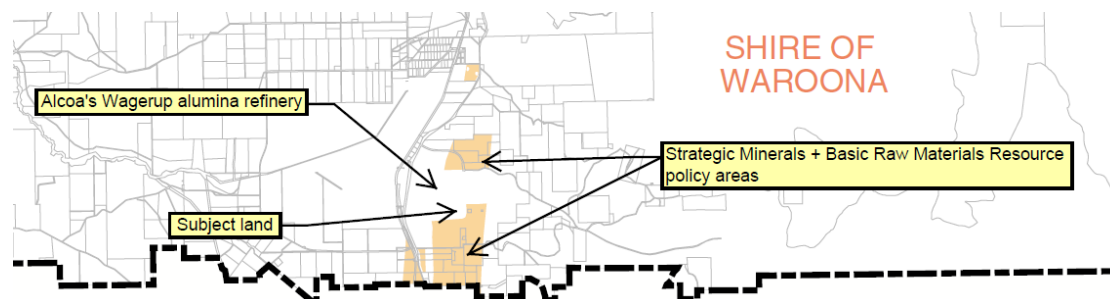
Lot 701 is about 1.7km – 1.9 km (as the crow flies) from the nearest designated Priority Agricultural Area located immediately south of Alcoa's Alumina Refinery residue lakes (see map below).



(Source: WAPC, Priority Agricultural and Rural Land Use Policy – Figure 1, 2017)

In any event, given the relatively benign nature of the proposed development, and that it has received works approval from the Environmental Protection Authority (EPA), it is considered that the proposed development will not adversely affect nearby agricultural uses and activities, including within the above designated priority agricultural area.

In respect to the PRS *Strategic Minerals and Basic Raw Materials Resource Policy*, Lot 701 is located between two designated policy areas located immediately north and south of Alcoa's Wagerup Alumina refinery (see map below) and as such will not prejudice the taking of minerals and basic raw material from these policy areas.



(Source: WAPC, Strategic Minerals and Basic Raw Materials Resource Policy Map – Figure 1, 2002)

Local Planning Scheme No.7 (LPS7)

LPS7 prescribes minimal provisions in respect to development proposed within the Special Industry zone against which the proposed BSS can be assessed. These provisions comprise a mix of general development requirements (eg. general appearance of buildings and preservation of amenity, car parking, building height, construction of crossovers etc) and provisions specific to the zone.

For the purpose of assessing the proposed development against relevant LPS7 provisions, the proposed development is akin to a public utility as defined in LPS7.

LPS7 defines a public utility as “ ... *any work or undertaking constructed or maintained by a Public Authority or the Council as may be required to provide water, sewerage, electricity, gas, drainage, communications or other similar services*”.

Ordinarily, Alinta Energy (the proponent and operator of the BSS) is not a public authority therefore (and arguably) appears not to fit the meaning of a public utility as defined by LPS7.

However, the *Planning and Development Act 2005*, includes in its definition of a public authority “ ... *any other person or body, whether corporate or not, who or which, under the authority of a written law, administers or carries on for the benefit of the State, a social service or public utility*”.

Alinta Energy contracts to the State of Western Australia to provide or supply electricity to the State’s south west electricity grid (known as the South West Integrated System or SWIS) with part of this supply being generated from the WPS.

On the basis of the above definition of a public authority, the proposed development is considered as a public utility pursuant to LPS 7.

Clause 3.18.1 of LPS7 restricts land use and development within the Special Industry zone to the operations of the industry identified on Scheme Map.

Unfortunately, the relevant scheme map (electronic copy held by the DPLH) containing Lot 700 (the Wagerup Alumina Refinery) and Lot 701 (WPS) does not denote the any land use or development for the Special Industry zoning. The BSS use and development is however is considered an expansion of the existing WPS on the site.

LPS 7 General Development Requirements

The proposal is deemed to comply in respect to the following key general development requirements:

- Vehicle Parking and Access
(LPS7 – cl. 4.16)

LPS 7 does not prescribe a minimum number of car bays to be provided for a public utility. Thus, the number of onsite car bays to be provided is at the discretion of the local government.

The applicant advises that 20 vehicle parking bays are available within Lot 701, located immediately west of the WPS office. Presently, up to six Alinta Energy personnel attend the WPS on a daily basis, typically resulting in 6 vehicles parked onsite daily. However, with potential for one further person to be employed onsite to assist with the WSP operations as a consequence of the BSS becoming operational, likely resulting in the need for up to 7 onsite parking bays. This can easily be accommodated by the current parking provision.

- Development of land without constructed or dedicated road frontage/access
(LPS7 – cl. 4.20)

LPS 7 requires access to a development site to be provided from a dedicated road or by other alternate legal access arrangements.

Access to Lot 701 is provided by an easement access registered on its Certificate of Title.

- **Building Height**
(LPS7 – cl. 4.24.1)

The maximum building height within the scheme area is 9 metres unless otherwise varied by the local government.

The transformers, inverters and battery cube elements of the proposed development will not exceed 3.4 metres in height. The proposed control building will be elevated above the ground, standing just over 6 metres high and will be the tallest structure of the proposed development.

By comparison the existing WPS turbine stacks are 35 m high.

- **General Appearance of Buildings and Preservation of Amenity**
(LPS7 – cl. 4.25)

This provision principally requires the design and appearance (eg. colours, materials, height, bulk, massing etc) of proposed buildings to be in harmony with existing buildings and the landscape in which it will sit.

The design and layout of the BSS will be relatively uniform and regimented as depicted in Attachments 4 and 5 to this report.

However, the scale of the BSS will be low-profile and considerably smaller than the existing power station located within Lot 701 and the adjacent alumina refinery which dominates the surrounding landscape.

Due to the slightly raised vegetated and treed embankment extending along the eastern flank of Lot 701, the proposed BSS will not be highly visible from the access road leading from Willowdale Road into the alumina refinery and the existing WPS.

Vegetation clearing of the development footprint will be necessary and some removal or trimming of existing trees along the eastern boundary of Lot 701 may be required. To offset this, it is recommended that a typical landscaping condition be attached to any approval granted, with specific reference to existing mature trees being retained wherever possible and additional screen plantings being provided along the eastern boundary of Lot 701.

Notwithstanding, within the context of the existing WPS and refinery, the proposed development will have minimal visual impact.

As the proposed development will not have any moving nor significant noise-emitting parts, and will not generate air or odour emissions, it is also considered that the proposed development will not have any significant detrimental impact on the amenity of the surrounding area, especially within the context of the existing WPS and refinery.

As such it is contended that the BSS will be in harmony with the adjacent WPS and the Alumina Refinery development.

Heritage

- Aboriginal

According to the State's Aboriginal Heritage Enquiry System (AHES) Lot 701 does not contain any registered Aboriginal Heritage site but is located adjacent to Registered Site 3235 (Wagerup 4) (west of Lot 701). This registered site is not a protected site.

Lot 701 is, however, included within the AHES category 'Other Heritage Places' (being site 3233 – Wagerup 2). This site is not a registered site nor is it a protected site. According to the applicant any previous heritage value this site had has since been removed or been destroyed by the construction of the alumina refinery and no longer exists.

- Shire of Waroona Heritage

Lot 701 is not included in the Shire's heritage list established under clause 7.1 of LPS7 nor is it listed in its *Municipal Heritage Inventory* (2001).

Dangerous Goods

The proposed development will result in small increases in the storage of some substances already identified on the applicant's Dangerous Good Site Licence.

These substances are subject to compliance with the above licence and Alinta's existing suite of controlled storage and handling procedures.

Conclusion:

Assessment of the proposed development against salient provisions of the State and local planning frameworks reveals that the proposed development:

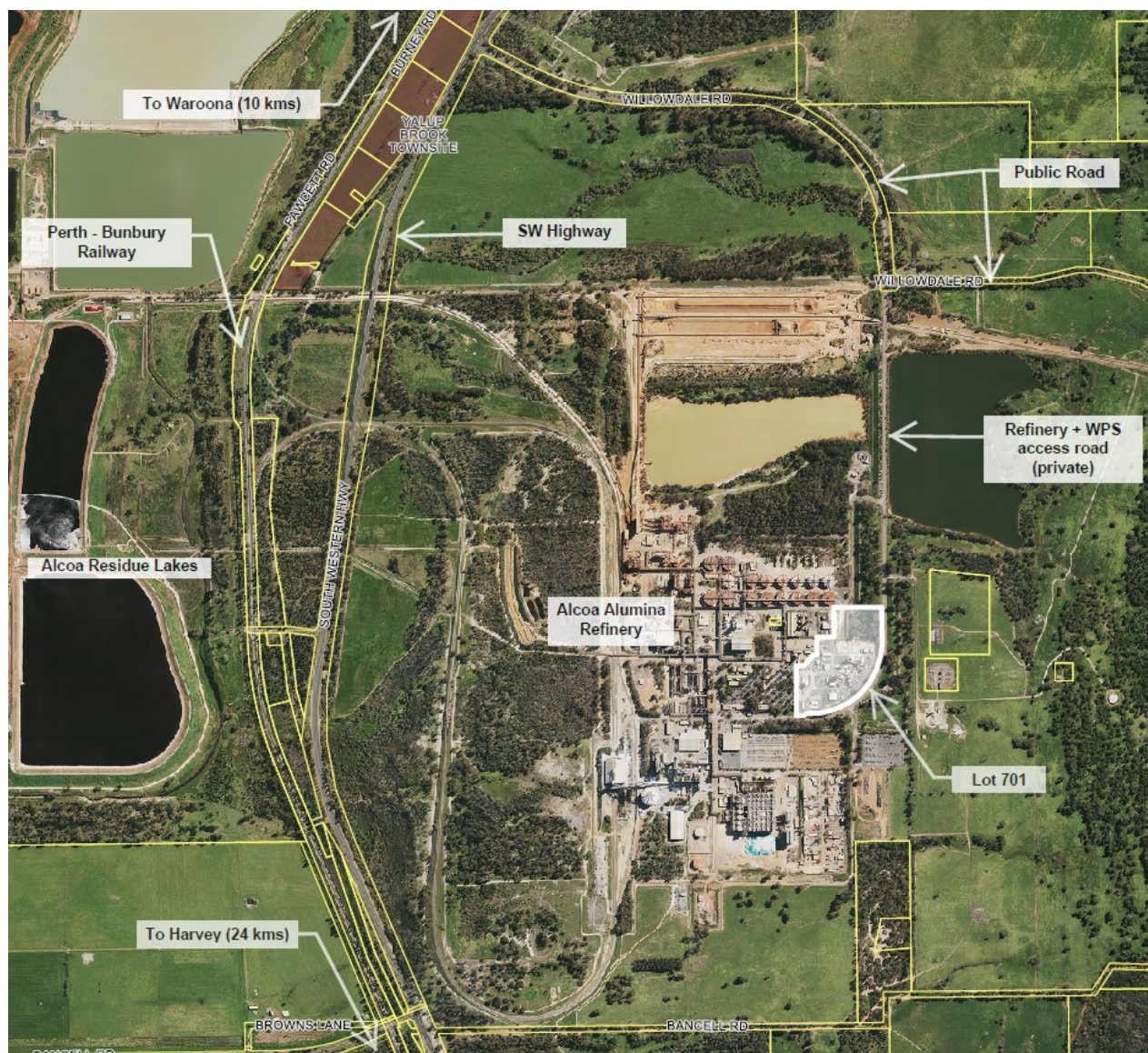
1. Can be reasonably classified as a 'public utility' for the purpose of its assessment;
2. Is compatible with existing development within the 'Special Industry' zoning applying to the subject land;
3. Generally complies with applicable clauses 4.16, 4.20, 4.24.1, 4.25, and for all intents and purposes, clause 3.18.1 of LPS 7; and

The proposed development will introduce a more sustainable and benign way of generating electricity without any (or minimal) detrimental impacts upon the surrounding Wagerup and wider landscape and natural environment.

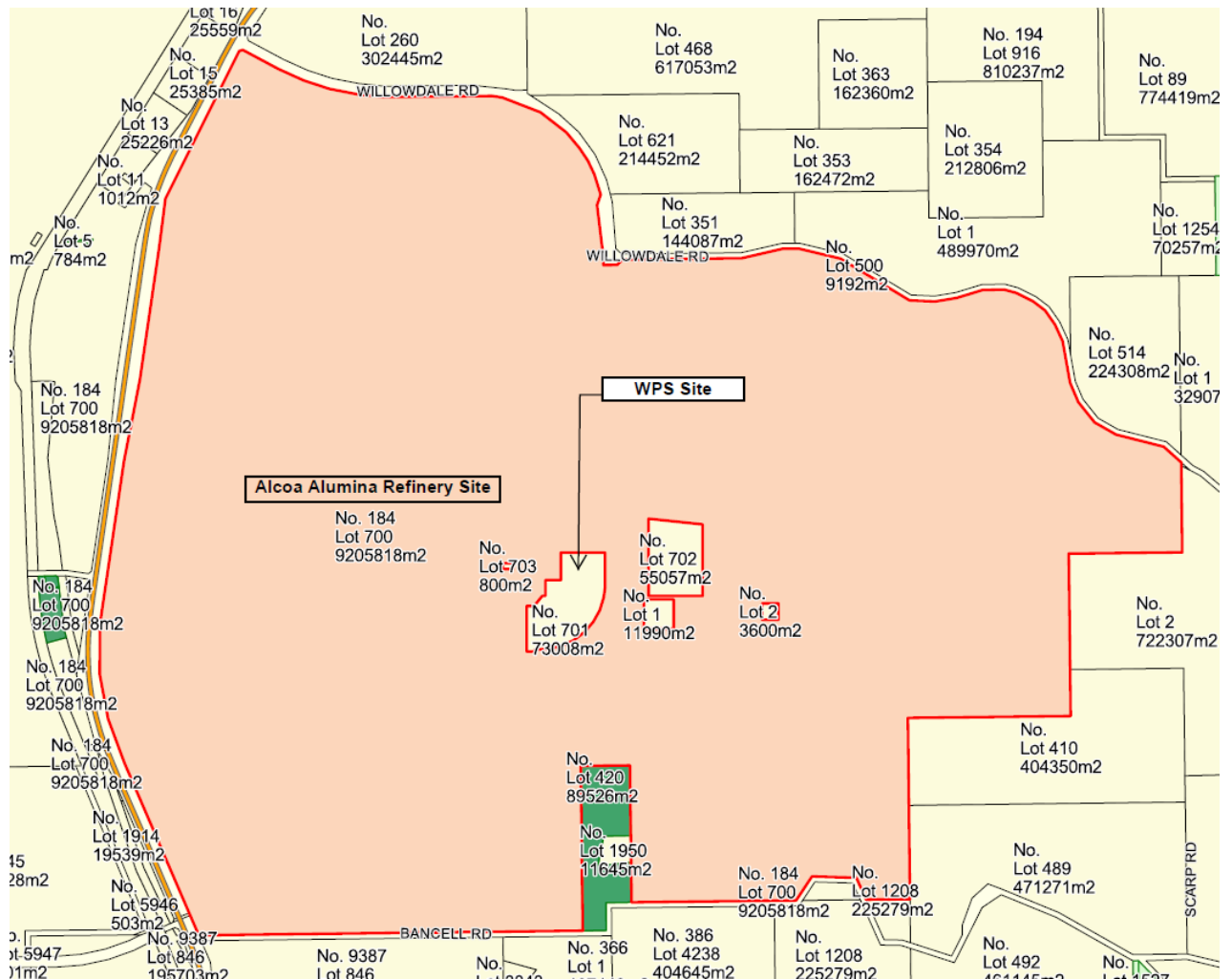
Importantly too, as the applicant states, the development will also be entirely compatible with the State's strategies and objectives for energy security and reliability.

It is recommended that the Regional JDAP resolves to approve the application with conditions.

ATTACHMENT 1
LOCATION MAP



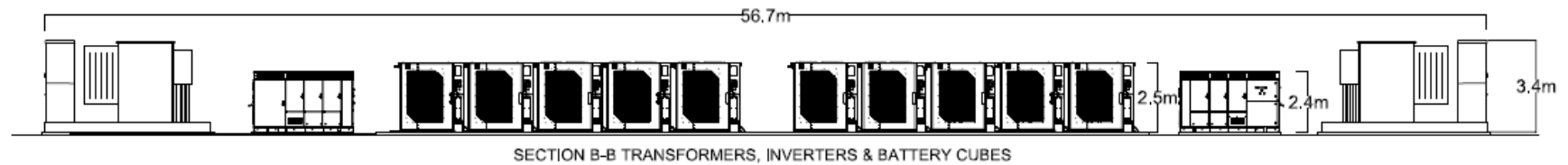
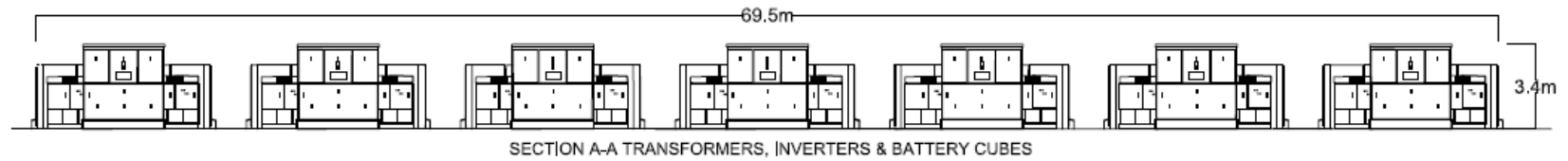
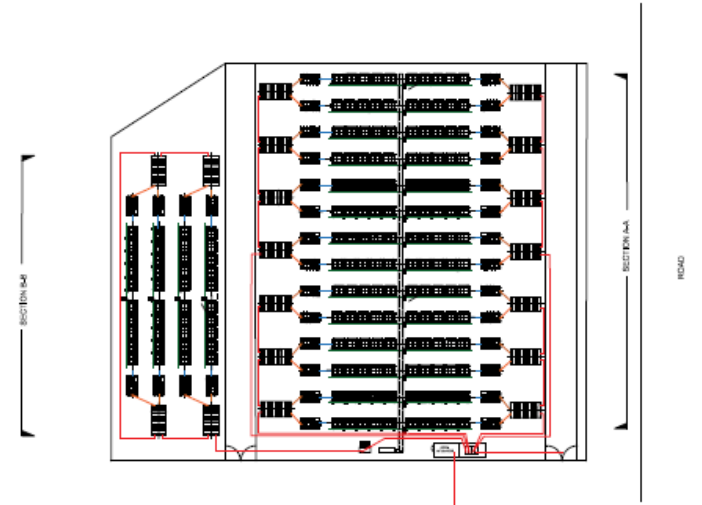
ATTACHMENT 2
CADASTRE MAP



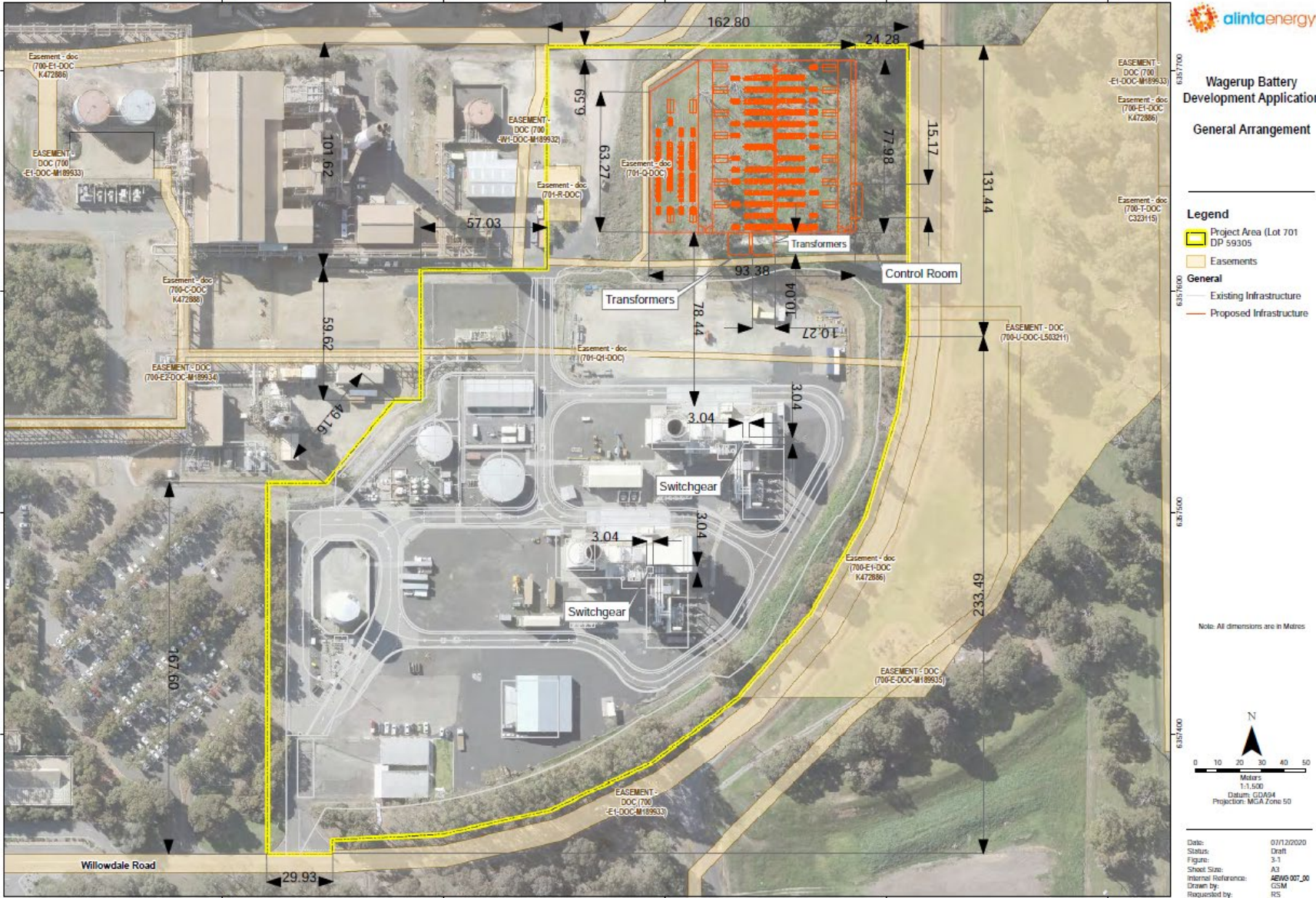
ATTACHMENT 3
EXISTING DEVELOPMENT_LOT 701



ATTACHMENT 4
SITE LAYOUT, ELEVATION AND SECTION DRAWINGS



SITE LAYOUT OVERLAIN AERIAL IMAGE OF LOT 701



ATTACHMENT 6
HORNSDALE WIND FARM SOUTH AUSTRLIA



ATTACHMENT 7
NEWMAN POWER STATION BSS (PILBARA)



ATTACHMENT 8
SITE PHOTOGRAPHS



Subject site viewed from east side of the access road to the alumina refinery and the WPS



Subject site viewed from the south-east side of the access road to the alumina refinery and the WPS

Russell Slaughter
Manager, Planning and Community
Alinta Energy
Level 18 Raine Square
300 Murray Street
PERTH 6000 WA

Our Ref: DWERT6165
Enquiries: Natalie McAlpine, 6364 6574
Email: natalie.mcalpine@dwer.wa.gov.au

Dear Mr Slaughter

**WAGERUP COGENERATION PROJECT – MINISTERIAL STATEMENT 729 –
CHANGE TO PROPOSAL APPROVED UNDER SECTION 45C OF THE
ENVIRONMENTAL PROTECTION ACT 1986**

Thank you for your correspondence of 17 February 2021 requesting approval of changes to the Wagerup Cogeneration Project (Ministerial Statement 729).

I am satisfied that there is no reasonable possibility that the requested changes to the proposal, as described in Attachment 4 to Ministerial Statement 729, will have a significant detrimental effect on the environment in addition to, or different from, the effect of the original proposal. Approval of the changes is therefore granted under section 45C of the *Environmental Protection Act 1986*. This approval does not affect any responsibilities you may have to seeking approvals from other government agencies to implement the changes.

Please note implementation of the Wagerup Cogeneration Project proposal, including the approved changes described in Attachment 4, is subject to the conditions of Ministerial Statement 729. The Chief Executive Officer of the Department of Water and Environmental Regulation may monitor the implementation of the proposal for the purpose of determining whether the implementation conditions are being complied with.

Yours sincerely



Professor Matthew Tonts
CHAIR

1 April 2021

Encl. Copy of Attachment 4 to Ministerial Statement 729

Attachment 4 to Ministerial Statement 729

Change to proposal approved under section 45C of the *Environmental Protection Act 1986*

This Attachment replaces Schedule 1 and Attachment 3 of Ministerial Statement 729

Proposal: Wagerup Cogeneration Project

Proponent: Alinta Cogeneration (Wagerup) Pty Ltd

Changes:

- Installation of a battery energy storage system (BESS), with a battery power output of 100 megawatts.

Table 1: Summary of the Proposal

| | |
|-------------------|---|
| Proposal Title | Wagerup Cogeneration Project |
| Short Description | The proposal is for the construction, operation and maintenance of a natural gas-fired power station with a nominal generation capacity of 350 megawatts electrical output and 460 tonnes per hour of steam output, and a battery energy storage system , on a site located at Alcoa's Wagerup alumina refinery (location shown in Figures 1 and 2). The proposal is to be implemented in two stages, with a transition phase between Stage 1 and Stage 2. |

Table 2: Location and authorised extent of physical and operational elements

| Element | Location | Previously Authorised Extent | Authorised Extent |
|---|---------------------|---|---|
| Stage 1: Open-cycle peak load power station – To supply electricity to the South West Interconnected System (SWIS) over a project life of approximately 25 years | | | |
| Power Generation Output | Figure1 & Figure 2 | 350 megawatts (nominal) | 450 megawatts (nominal) |
| Plant Facilities Gas turbine specifications | Figure 1 & Figure 2 | 2 x gas turbines of 175 megawatts nominal generating capacity fitted with dry low NO _x burners | 2 x gas turbines of 175 megawatts nominal generating capacity fitted with dry low NO _x burners |
| Battery Energy Storage System | | | A modular 100 megawatt battery storage system |

| | | | |
|--|---------------------|---|---|
| Number of stacks | | Two | Two |
| Height of stacks | | 35 metres | 35 metres |
| Thermal Efficiency (Based on net higher heating value at 41 degrees Celsius and 40% relative humidity) | Figure 1 & Figure 2 | Approximately 30% | Approximately 30% |
| Operating hours Total per unit (gas and distillate) Distillate | Figure 1 & Figure 2 | Up to 4,000 hours per year Up to 100 hours per year | Up to 4,000 hours per year Up to 100 hours per year |
| Inputs Natural Gas Distillate | Figure 1 & Figure 2 | Approximately 14.1 petajoules per annum Approximately 0.4 petajoules per annum | Approximately 14.1 petajoules per annum Approximately 0.4 petajoules per annum |
| Air Emissions Carbon dioxide equivalents (CO ₂ -e) Oxides of nitrogen (NO _x) | Figure 1 & Figure 2 | 825,000 tonnes per annum 790 tonnes per annum | 825,000 tonnes per annum 790 tonnes per annum |
| Transition phase: Open-cycle with increased operating hours | | | |
| Operating hours | Figure 1 & Figure 2 | Once the proponent has advised the Environmental Protection Authority of its decision to develop Stage 2, the gas turbines may be operated in a transition phase in open-cycle mode for a total of 15,500 hours per unit in addition to those hours allowed in Table 2. The transition phase is expected to last around three years and the proponent may apportion the 15,500 additional operating hours over the three years as they see fit. | Once the proponent has advised the Environmental Protection Authority of its decision to develop Stage 2, the gas turbines may be operated in a transition phase in open-cycle mode for a total of 15,500 hours per unit in addition to those hours allowed in Table 2. The transition phase is expected to last around three years and the proponent may apportion the 15,500 additional operating hours over the three years as they see fit. |
| Stage 2: Cogeneration base-load power station – To supply power to the SWIS and steam to the Wagerup alumina refinery | | | |

| | | | |
|--|---------------------|---|---|
| Generation Power output (gas turbines) | | 350 megawatts (nominal) | 350 megawatts (nominal) |
| Battery output | Figure 1 & Figure 2 | | 100 megawatts (nominal) |
| Steam output | | 460 tonnes per hour (typical) | 460 tonnes per hour (typical) |
| Plant Facilities | | | |
| Gas turbine specifications | | 2 x gas turbines of 175 megawatts nominal generating capacity fitted with dry low NO _x burners | 2 x gas turbines of 175 megawatts nominal generating capacity fitted with dry low NO _x burners |
| Heat recovery steam generator (HRSG) | Figure 1 & Figure 2 | 2 x HRSGs with a capacity of 430 tonnes per hour | 2 x HRSGs with a capacity of 430 tonnes per hour |
| Number of stacks | | 4 (including the two disconnected open-cycle stacks) | 4 (including the two disconnected open-cycle stacks) |
| Height of HRSG stacks | | 2 x 50 metres (cogeneration), 2 x 35 metres (disconnected) | 2 x 50 metres (cogeneration), 2 x 35 metres (disconnected) |
| Battery Energy Storage System | | | A modular 100 megawatt battery storage system |
| Thermal Efficiency (Based on net higher heating value at 18 degrees Celsius and 20% relative humidity) | Figure 1 & Figure 2 | Approximately 74% (based on one gas turbine and one HRSG fully fired) | Approximately 74% (based on one gas turbine and one HRSG fully fired) |
| Operating hours Per unit | Figure 1 & Figure 2 | Up to 8,760 hours per annum | Up to 8,760 hours per annum |
| Inputs Natural Gas | Figure 1 & Figure 2 | Approximately 31.8 petajoules per annum | Approximately 31.8 petajoules per annum |
| Air Emissions Carbon dioxide equivalents (CO ₂ -e) | Figure 1 & Figure 2 | 1,781,000 tonnes per annum | 1,781,000 tonnes per annum |

| | | | |
|---------------------------------------|--|------------------------|------------------------|
| Oxides of nitrogen (NO _x) | | 1,331 tonnes per annum | 1,331 tonnes per annum |
|---------------------------------------|--|------------------------|------------------------|

Note: Text in **bold** in Table 2 indicates a change to the proposal.

Table 3: Abbreviations

| Abbreviation | Term |
|--------------|-------------------------------|
| BESS | Battery Energy Storage System |
| CEO | Chief Executive Officer |
| GL | gigalitre |
| ha | hectare |
| km | kilometre |

Figures (attached)

Figure 1 Regional Location

Figure 2 Site Layout

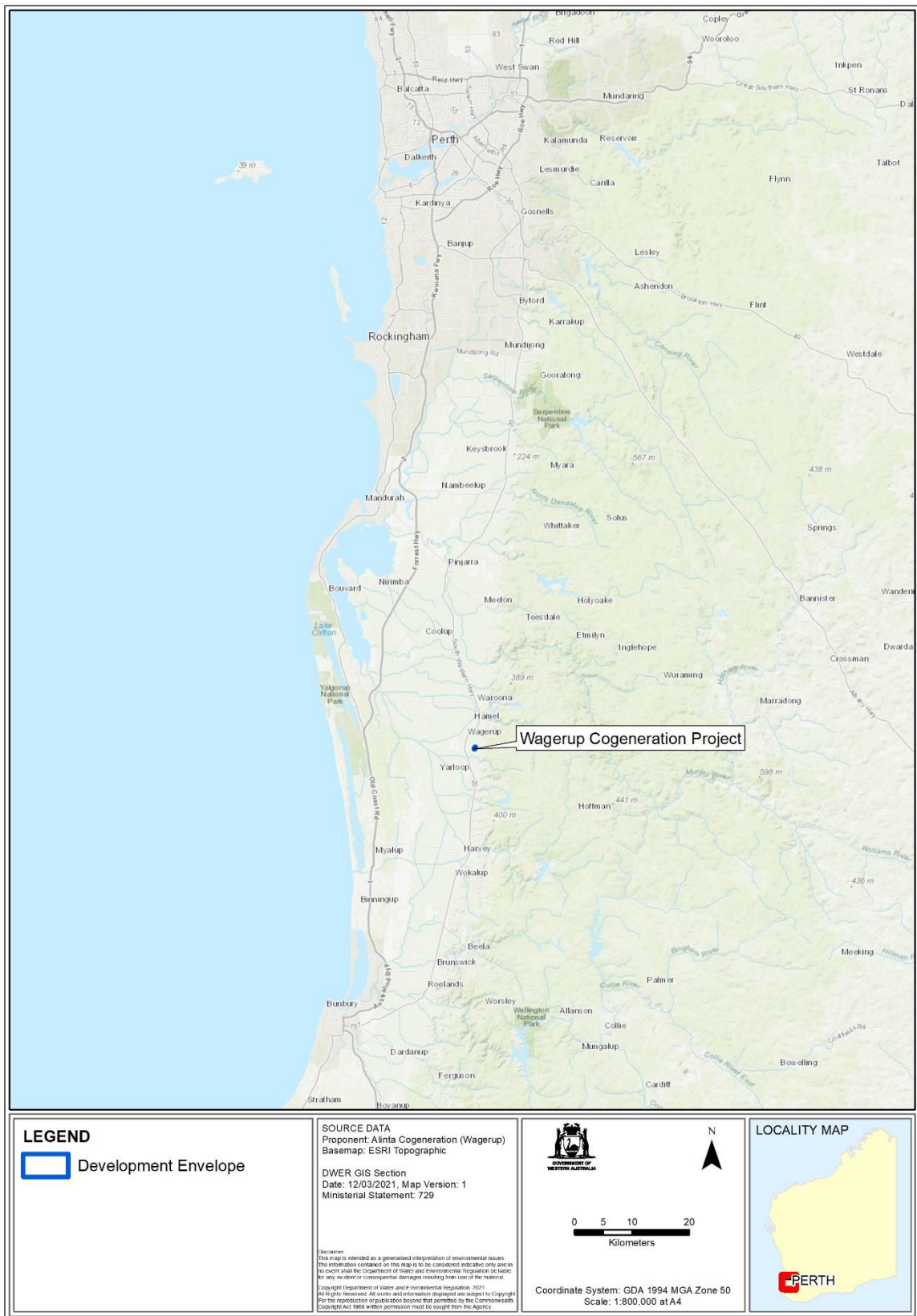


Professor Matthew Tonts

CHAIR

Environmental Protection Authority
under delegated authority

Approval date: 1 April 2021



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Figure 1. Regional Location

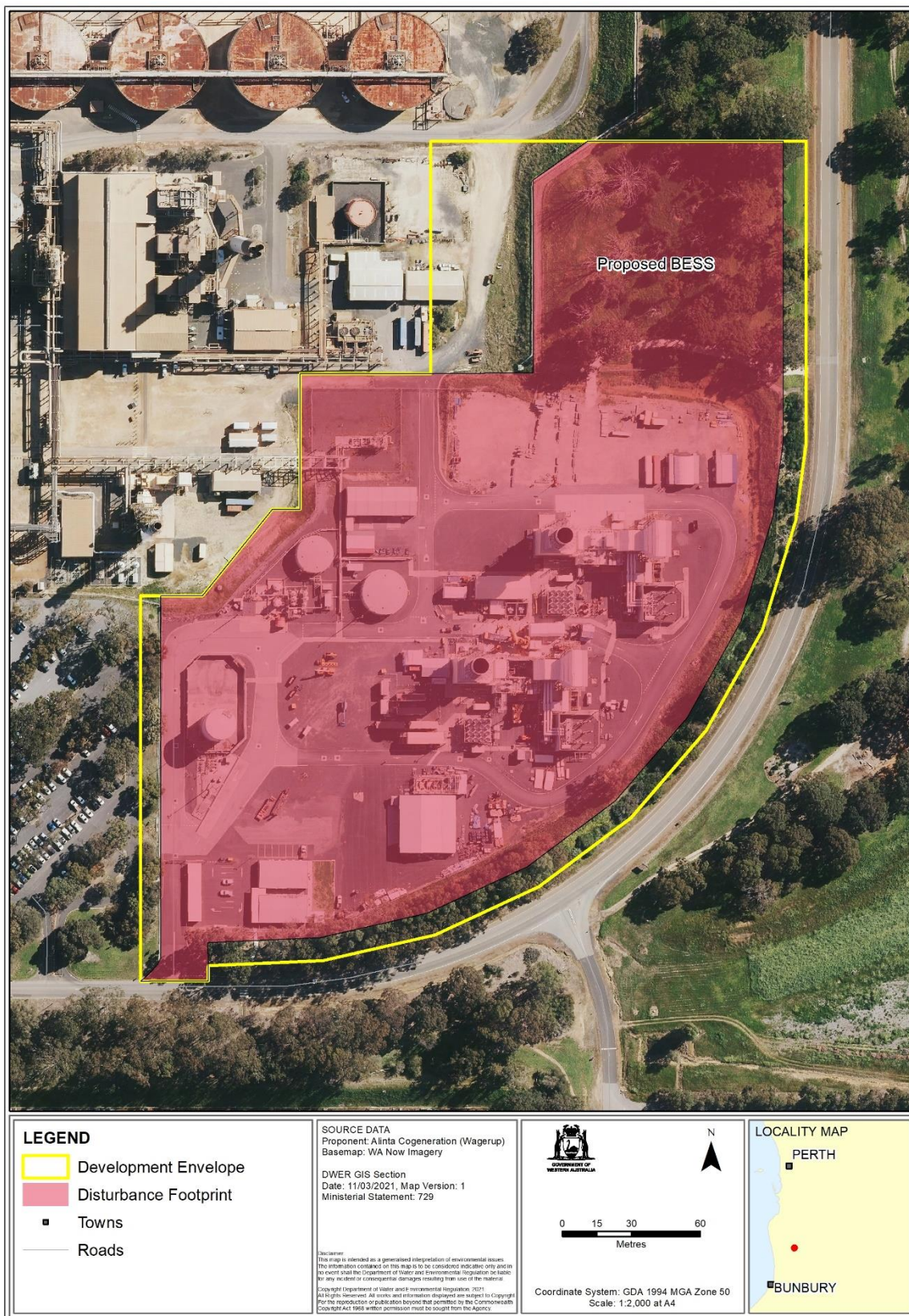


Figure 2. Site Layout

Co-ordinates defining the regional location and development envelope are held by the Department of Water and Environmental Regulation, Document Reference Number DWERDT430623



Government of Western Australia
Department of Water and Environmental Regulation

**ATTACHMENT 11
COPIES OF REFERRAL AGENCY
RESPONSES**

Your ref: TP2195:A3922
Our ref: RF9843-03, PA 039357
Enquiries: Jane Sturgess, Ph 9550 4228

Shire of Waroona
PO Box 20
Waroona WA 6215

Attention: Anthony Dowling

Dear Anthony

***LOT 701 WILLOWDALE ROAD, WAROONA – PROPOSED DEVELOPMENT
APPLICATION – WAGERUP BATTERY STORAGE SYSTEM***

Thank you for providing the development application received with correspondence dated 24 December 2020 for the Department of Water and Environmental Regulation (Department) to consider.

The Department has identified that the proposed battery storage system has the potential for impact on environment and water resource values and/or management. In principle the Department does not object to the proposal however key issues, recommendations and advice are provided below and these matters should be addressed.

Issue

Industry Regulation

Advice

The Department regulates emissions and discharges from the construction and operation of prescribed premises through a works approval and licensing process, under Part V, Division 3 of the *Environmental Protection Act 1986* (EP Act).

The categories of prescribed premises are outlined in Schedule 1 of the *Environmental Protection Regulations 1987*.

The EP Act requires a works approval to be obtained before constructing a prescribed premises and makes it an offence to cause an emission or discharge from an existing prescribed premises unless they are the holder of a works approval or licence (or registration) and the emission is in accordance with any conditions to which the licence or works approval is subject.

The provided development application request was reviewed in relation to works approval and licence requirements under Part V Division 3 of the EP Act.

The premises is licensed under Part V of the EP Act (licence number L8174/2007/5) as a Category 52 electric power generation facility. The Licence Holder is Alinta Cogeneration (Wagerup) Pty Ltd.

The current licence commenced on 13 November 2014 and was issued to Alcoa of Australia Limited and was transferred to Alinta Cogeneration (Wagerup) Pty Ltd in June 2017. The licence conditions are limited to administrative requirements, such as reporting.

Any proposed expansion or changes to the existing facility may trigger provisions of section 53 of the *Environmental Protection Act 1986* and can be authorised through a works approval or licence amendment. The Department will retain discretion on whether a works approval or licence amendment application is appropriate – further guidance on changes to prescribed premises can be found in the Department's Industry Regulation Guide to Licensing which can be accessed at: <https://www.der.wa.gov.au/our-work/licences-and-works-approvals/540-guideline-industry-regulation-guide-to-licensing>.

The premises is also subject to conditions under Ministerial Statement 729 which include conditions relating to greenhouse gas abatement, stack emissions and noise.

The Department has advised the applicant that the proposal would trigger a requirement to complete a Section 45C application for an amendment to the Ministerial Statement and that formal planning consent would only be forthcoming once this amendment had been approved.

An application for licence amendment or works approval, or Section 45C amendment has not yet been received by the Department.

The application/s will also need to demonstrate compliance with the *Environmental Protection (Noise) Regulations 1997* and *Environmental Protection (Unauthorised Discharges) Regulations 2004*.

If a prospective buyer purchases the property, they are required to comply with the conditions of the licence and within 30 days of becoming the occupier they must apply for a transfer of the licence or for a new works approval or licence as per section 61 of the EP Act. After the licence has been transferred, the prospective buyer may wish to surrender the licence as per section 59B of the EP Act. Alternatively, the licence may be surrendered by the current occupier prior to its sale of the premises.

The prospective buyer is therefore advised to refer to the *Guideline: Industry Regulation Guide to Licensing* available at <http://www.der.wa.gov.au/our-work/licences-and-works-approvals> and / or if they have queries relating to works approvals and licences to contact the Department at info@dwer.wa.gov.au or 6364 7000.

Issue

Native Vegetation Protection

Advice

Under section 51C of the *Environmental Protection Act 1986* (EP Act), clearing of native vegetation is an offence unless undertaken under the authority of a clearing permit, or the clearing is subject to an exemption. Exemptions for clearing that are a requirement of written law, or authorised under certain statutory processes, are contained in Schedule 6 of the EP Act. Exemptions for low impact routine land

management practices outside of environmentally sensitive areas (ESAs) are contained in the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (the Clearing Regulations).

Based on the information provided it is likely that this proposal is exempt from the requirement for a clearing permit under Regulation 5, Item 1 of the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004* (the Clearing Regulations), as described in the Departments '[A Guide to the Exemptions and Regulations for Clearing Native Vegetation](#)'. It is the applicant's responsibility to determine compliance with these exemptions and therefore whether a clearing permit is required.

The exemption will only apply once the planning/development approval has been issued.

If further clarification is required please contact DWER's Native Vegetation Regulation section by email (admin.nvp@dwer.wa.gov.au) or by telephone (6364 7098).

Where the Department has a statutory role, planning applications should be considered prior to the Department issuing any relevant permits, licenses and/or approvals.

In the event that the applicant determines that a works approval or licence application is required under Part V of the *Environmental Protection Act 1986* (EP Act), the advice provided in this communication does not prejudice and must not be considered to infer the outcome of the EP Act licence and works approval process.

In the event there are modifications to the proposal that may have implications on aspects of environment and/or water management, the Department should be notified to enable the implications to be assessed.

Should you require any further information on the comments please contact Jane Sturgess on 9550 4228.

Yours sincerely



Brett Dunn
Program Manager – Planning Advice
Kwinana Peel Region

28 / 01 / 2021

Tony Dowling

From: DFES Land Use Planning <advice@dfes.wa.gov.au>
Sent: Monday, 1 February 2021 2:11 PM
To: Waroona Shire
Subject: I11074 - TP2195 - TP2195:A3922 - Lot 701 Willowdale Road, Waroona - Wagerup Battery Storage System - DFES Response

Your Ref: TP2195:A3922
DFES Ref: D19425

Dear Sir/Madam,

I refer to your letter dated 24 December 2020 regarding the above proposal.

The Department of Fire & Emergency Services (DFES) provide the following comments with respect to State Planning Policy 3.7 Planning in Bushfire Prone Areas (SPP 3.7) and the Guidelines for Planning in Bushfire Prone Areas (Guidelines):-

- The proposed development application is located within an area that has been designated as a 'bushfire prone area' by the Fire and Emergency Services Commissioner pursuant to the Fire and Emergency Services Act 1998. In accordance with the requirements SPP 3.7, any development within a bushfire prone area is to be accompanied by:
 - a) (i) a BAL assessment. BAL assessments should be prepared by an accredited Level 1 BAL Assessor or a Bushfire Planning Practitioner unless otherwise exempted in the Guidelines; or
 - (ii) a BAL Contour Map that has been prepared for an approved subdivision clearly showing the indicative acceptable BAL rating across the subject site, in accordance with the Guidelines. BAL Contour Maps should be prepared by an accredited Bushfire Planning Practitioner.
 - b) the identification of any bushfire hazard issues arising from the BAL Contour Map or the BAL assessment; and
 - c) an assessment against the bushfire protection criteria requirements contained within the Guidelines demonstrating compliance within the boundary of the development site. This information can be provided in the form of a Bushfire Management Plan or an amended Bushfire Management Plan where one has been previously endorsed.
- The proposed land use will also need to demonstrate compliance to Policy Measure 6.6 - Vulnerable or High-risk land uses of SPP 3.7.

Given the proposed development has the potential to increase the threat of bushfire to people, property and infrastructure, it is considered that it should not be supported until such time that the bushfire risk and hazard reduction measures are established and understood. DFES recommends that this development application be deferred to allow the proponent to submit the required information in accordance with SPP 3.7 and the Guidelines.

Regards

Craig Scott
Senior Land Use Planning Officer | Land Use Planning

Emergency Services Complex | 20 Stockton Bend Cockburn Central WA 6164
T: 08 9395 9713 | E: advice@dfes.wa.gov.au | W: dfes.wa.gov.au



FOR A SAFER STATE



Government of **Western Australia**
Department of **Mines, Industry Regulation and Safety**
Resources Safety

Your ref: TP2195:A3922
Our ref: X0001/201901
Enquiries: Eric Gruber - Ph 9358 8037
Email: eric.gruber@dmirs.wa.gov.au

Anthony (Tony) Dowing
Acting Manager Planning
Shire of Waroona

Dear Tony

**DEVELOPMENT APPLICATION – BATTERY STORAGE SYSTEM – LOT 701
(DP59305) WILLOWDALE ROAD, WAROONA WA 6056**

A request for comment was received from the Shire of Waroona in relation to the above planning application and the proposal to establish a Battery Storage System, at the above address.

Based on the provided information the site has a current Dangerous Goods Storage Licence. The addition of the proposed Battery Storage System would require a Licence Amendment to be submitted for the existing licence for this location.

If you have any queries regarding this letter, please contact me on 9358 8037.

Yours faithfully,

Eric Gruber

Eric Gruber
Acting Manager Dangerous Goods
Dangerous Goods and Critical Risks Directorate
18 January 2021

Your Ref: TP2195:A3922
Our Ref: LM: Planning Jan 2021
Contact: Neil Parry
Telephone: 08 9223 4944



ABN 78 081 609 289
Level 23, 140 St Georges Terrace
Perth WA 6000
Postal Address
PO Box Z5267
Perth St Georges Tce WA 6831
Telephone: +61 8 9223 4300
Facsimile: +61 8 9223 4301

5 January 2021

Mr Dean Unsworth
Chief Executive Officer
Shire of Waroona
PO Box 20
WAROONA WA 6215

Attention: Anthony Dowling

Dear Dean

**LOT 701 WILLOWDALE ROAD, WAROONA PROPOSED DEVELOPMENT WAGERUP
BATTERY STORAGE SYSTEM**

Thank you for your letter dated 24 December 2020 seeking comment on the above proposal. DBP as the owners and operators of the Dampier to Bunbury Natural Gas Pipeline (DBNGP) has no objection to the proposed Battery Storage System.

Thank you for the opportunity to provide comments and should you have any further inquiries, please do not hesitate to contact me on the number above.

Yours sincerely

A handwritten signature in dark ink, appearing to read "Neil Parry", is written over a light grey circular stamp.

Neil Parry
Head of Land Management
Dampier Bunbury Pipeline



Response Guidelines

In all bushfire situations,

- Direct all persons to move or remain indoors and close all windows and doors.
- Turn air-conditioning off or put on re-circulated air cycle to stop smoke from being drawn inside.
- Contact Chief Warden
- Contact emergency services on 000.
- Render any first aid if necessary.
- Monitor persons for symptoms of smoke exposure and duress.
- Chief Warden to inform staff and visitors of situation and any specific instructions.
- Wardens should patrol the site for ember ignitions extinguishing them where it is safe to do so.
- Advise attending fire personnel of areas where attention is needed.
- Chief Warden to contact the relevant bush fire agency to ascertain the extent of the threat and determine an appropriate course of action. Phone 000, if appropriate.
- Brief Emergency Control Organisation on the extent of the threat and place them on standby.
- Chief Warden to consider arranging transport to relocate persons off site if needed.
- Maintain contact with emergency services and act on any instructions given.
- Consider activation of Critical Incident Plan and/or Business Continuity Plan should the bush fire cause extended time away from the building.

If an evacuation is required:

Follow evacuation procedures, ensure all buildings are clear.

If you are caught in the open during a bushfire:

This section is relevant for persons that may be located in more remote areas away from their usual building.

Anticipate the fire behaviour and plan your course of action:

- Move to a low fuel area.
- Don't try to outrun the fire – move across the front of the fire to the flanks (sides).
- Move downhill - the most intense fire will be at the top of hills. Don't try to run through the flames unless you can clearly see behind them. This means flames less than 1m high and less than 3m deep. Move towards the flanks or back of the fire, and look for lulls in the fire to find flames of less intensity.
- If there is no possibility of escape STOP, LIE DOWN & COVER UP as far as possible. If your clothes catch fire ROLL on the ground to extinguish the flames.
- If possible COVER your mouth and nose with a wet cloth.
- REMAIN CALM and avoid exhaustion – plan your actions.

Find an area that won't burn - the bigger the better.

- Avoid direct flame contact by getting to an area devoid of bushfire fuel.
- Look for large water bodies such as lakes, dams or creeks.

- Avoid areas of swampy vegetation, which can burn intensely.
- Avoid swimming pools, water tanks etc. During a fire, water heats up very quickly and the oxygen is sapped out of the atmosphere, a state of collapse is reached in about three minutes