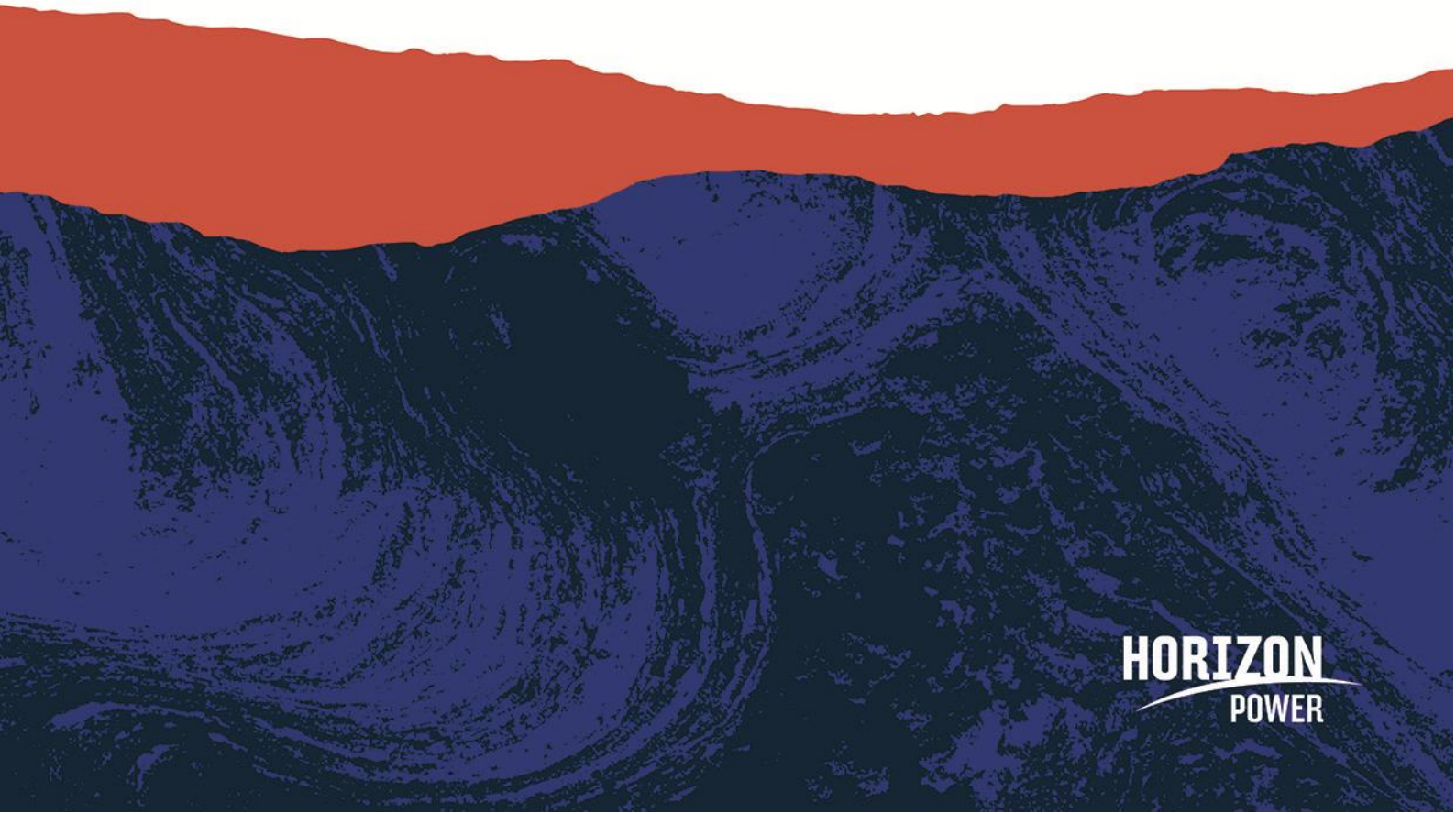
Carnarvon Solar Farm - Native Vegetation Clearing Permit

Supporting Document

July 2026



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1 Introduction

1.1 Project Context

Regional Power Corporation, trading as (T/A) Horizon Power, is a Western Australian (WA) Government Trading Enterprise (GTE) and the state's regional and remote energy provider. Horizon Power operates under the *Electricity Corporations Act 2005* and is governed by a Board of Directors accountable to the Minister for Energy and Decarbonisation.

The WA State Government has committed to reducing government carbon emissions by 80% (below 2020 levels by 2030), and Horizon Power is supporting the Government to achieve this target. Many towns in the Gascoyne Region are powered by high emission fossil fuels such as diesel or gas. In Carnarvon, Horizon Power currently operates the Mungullah Power Station, this FES would provide Horizon Power with an opportunity to integrate grid-scale renewable electricity into the town supply.

Horizon Power is proposing to construct a Future Energy System (FES) in Carnarvon in the Gascoyne region of WA (the Proposed Action). The Proposed Action will ensure security of energy supply to Carnarvon and integrate grid-scale renewable electricity into the town supply. As part of this future energy supply, Horizon Power is targeting higher renewables and a reduction in emissions as part of the decarbonisation strategy for the town.

The Carnarvon FES project will nominally consist of solar photovoltaic (PV) system (up to 25.07 megawatts alternating current (MWAC)), battery energy storage systems (BESS) (up to 11.08 megawatts MW / 62.19 megawatt-hour (MWh)) and a network connection route to the existing thermal power station adjacent to the site across North West Coastal Highway.

The solar PV and BESS will be installed at a site approximately 3 km east of Carnarvon townsite, on Lot 584 on Deposited Plan 69550 584 and Reserve 46622. The network connection route corridor will follow North West Coastal Highway to connect the solar PV and BESS to the existing power station. The network connection will be an underground electrical distribution and will be up to 2.2 km long between the DE and Mungullah Power Station.

Construction and operation of the Project will require permanent clearing of up to 110 ha within the 256.9 ha Survey area. It should be noted that the 110 ha clearing extent represents the maximum area of disturbance required to construct and install the Proposed Action, where opportunities are available, clearing will be minimised.

The DE has been developed as the area within which the least environmental constraints were identified in the biological survey.

1.2 Scope and Purpose

This document has been prepared to support a Native Vegetation Clearing Permit (NVCP) application for the Project. Specifically, this document provides further detail regarding the proposed activities and related clearing (including application of the mitigation hierarchy), and ecological surveys undertaken within and near to the clearing footprint.

An assessment of the 10 Clearing Principles as outlined in '*A guide to the assessment of applications to clear native vegetation*' (DER, 2014) has also been undertaken and is presented **Section 7**.

An Environment Management Plan (EMP) has also been prepared in support of the project and is provided in **Attachment A**.

2 Description of the Activity

2.1 Project Location

The Project is located off the North West Coastal Highway, 3km outside of the Carnarvon townsite within the Shire of Carnarvon. Land details of the DE are provided in Table 2-1 and the DE is shown on **Figure 1**.

Table 2-1 Development Envelope Location

Size of development Envelope (ha)	Development Envelope location	Shire	Neighbouring land uses
110 ha	Crown Land Lot 584 on Deposited Plan 69550, LR3161/508.	Shire of Carnarvon	Local road, highway, transport laydown yard, fuel depot, speedway, power station, rural.
	Crown Land Lot 455 on Deposited Plan 218083, LR3099/260.		
	Reserve 610 and 46622		
	P Road		



Figure 1 Development Envelope

2.2 Activity Overview and Timelines

A five-year clearing permit is requested to accommodate supplier procurement of batteries and renewable technology with clearing undertaken within 3 months of construction.

2.2.1 Pre-construction

Pre-construction activities will occur up to 12 months prior to construction and involve the following activities:

- Solar and BESS facility and network connection route site surveying and marking – surveying personnel utilising Global Positioning System (GPS) equipment to mark Proposed Action boundaries and exclusion zones.
- Solar and BESS facility soil and geotechnical investigations – geotechnical engineering and crew utilising excavators and vehicle mounted drill rig will conduct borehole drilling, soil sampling, soil testing and compaction tests. Up to 10 boreholes to a depth of 25 metres (m) and up to 5 tests pits (up to 5 m width by 5 m width) and up to 3 m depth may be conducted to support the geotechnical investigations. No more than 10 m x 10 m of clearing is permitted per test location. Geotechnical investigations require driving on vegetation to access test locations.
- Network Connection Route geotechnical investigations – geotechnical engineering and crew utilising excavators and vehicle mounted drill rig to conduct borehole drilling, soil sampling, soil testing and compaction tests. Up to 10 boreholes to a depth of up to 25 m and up to 5 tests pits (up to 5 m width by 5 m width) and up to 3 m depth may be conducted to support the geotechnical investigations. Access is expected to be from the existing road. No more than 10 m x 10 m of clearing is permitted per test location. Geotechnical investigations require driving on vegetation to access test locations.

2.2.2 Construction

The construction phase is expected to commence in 2027 for a duration of up to 24 months. Clearing of native vegetation is expected to take approximately 4 to 6 weeks and will be undertaken at the commencement of construction. Construction activities will be determined by weather, as the wet season in the Gascoyne typically occurs between November and April.

Construction personnel will consist of a Proposed Action workforce of up to 30 staff. Construction works will consist of:

- Clearing of up to 110 ha of vegetation, topsoil removal and stockpiling, grading and excavations.
- Weed control measures to manage the spread of invasive weeds.
- Supply of concrete will be either through the establishment of a temporary on-site concrete batch plant or concrete truck deliveries. Licences will be obtained by the contractor as required in accordance with Part V of the *Environmental Protection Act 1986*.
- Supply of water for construction purposes will be either trucked water or construction of a bore in accordance with the *Rights in Water and Irrigation Act 1914*.
- Supply of civil materials for ground levelling and fill will be trucked in from local sources.
- During construction, temporary laydown areas, ablutions, kitchen, offices, crib room, first aid, water supply, generators and other supporting facilities will be established onsite.
- Installation of the solar PV and BESS consisting of ground mounted solar panels, inverters, transformers, cabling, battery containers, substation and other ancillary infrastructure:
- Solar PV panels and frame will be nominally up to 4 m tall from ground level. The battery containers, substation and office building will nominally be up to 5 m tall.
- Footings of the solar system will involve either installed piles or concrete blocks. The piles solution may involve up to 5,000 steel piles (250 mm diameter) installed to a nominal depth of up to 5 m.
- Excavation works for internal electrical cabling may involve excavation of up to 2 km of trenching and up to approximately 1.5 m deep, resulting in excavation of up to 3,000 m3 of soil.

- Installation of a network connection from the solar and BESS facility, following and crossing North West Coastal Highway to the existing power station. The network connection will be an underground distribution line:
    - Trenching excavations and reinstatement of up to 2.2 km and up to 1 m wide and up to 1.2 m deep, total excavation of up to 2,600 m3 of soil.

Typical heavy machinery and vehicles are proposed to be utilised onsite during the construction phase will include (not limited to):

- Bulldozer
- Excavator
- Grader
- Telehandler
- Trenching machines
- Horizontal directional driller
- Cable reel trailers
- Hydraulic pullers
- Water cart
- Loader
- Cranes
- Semi-trailer truck
- Light vehicles.

Operations

The operational phase is expected to commence in 2030, with operational personnel shifts conducted during daylight hours at the solar and BESS facility while the solar is producing energy. Operations personnel will consist of a local workforce of up to three personnel per shift. There will be no accommodation onsite, personnel will commute to site daily.

Activities associated with the operational phase will include:

- Regulatory inspections and approvals
- Routine maintenance activities for the solar and BESS facility including visual inspections, solar panel cleaning (if required), solar panel replacement, minor and major services, electrical inspections and testing.
- Regular maintenance of the network line. This involves visual inspections, thermal imaging and electrical testing.
- Routine maintenance activities including weed control.
- Ongoing maintenance such as vegetation control, stormwater/drainage management, wildlife monitoring and reporting.

Machinery and vehicles used onsite during operational phase will typically include light vehicles, semi-trailer truck, cranes and telehandler.

Infrastructure is expected to be permanent and become part of the Carnarvon electricity network. Ownership model has yet to be determined however an agreement with the independent power producer will likely be 20 years, with options for extension.

2.3 Land Access

As an 'energy operator', Horizon Power has certain rights under Sections 46 and 49 of the *Energy Operators (Powers) Act 1979* (EOPA) which allow Horizon Power to access and use land for the purpose of constructing, maintaining and operating electricity infrastructure. Horizon Power will utilise these powers for the network connection.

The solar PV and BESS will be installed at a site approximately 3 km east of Carnarvon, on a portion of Lot 455 on Deposited Plan 218083, Lot 584 on Deposited Plan 69550, Reserves 610 and 46622 and P Road. The network connection route corridor will follow and cross North West Coastal Highway to connect the solar PV and BESS to the existing power station. The network connection will be underground electrical distribution and will be up to 2.2 km long. The solar farm parcel is under a Management Order to Horizon Power.

2.4 Proposal benefits and justification

As a renewable energy project, the Proposed Action has the potential to reduce up to 3,625 tonnes of CO_2e per annum compared to the emissions of the existing Mungullah power station. If the FES were to operate for 20 years, this would equate to a reduction of up to 75,674 tonnes of CO_2e. The Proposed Action will ensure security of energy supply to Carnarvon and contribute to the local economy through construction and operation phase job opportunities.

3 Description of Proposed Clearing

3.1 Proposed Clearing Area

The final design and footprint required for the Project will be determined once geotechnical survey works are completed and will also depend on the engineering, environmental and heritage constraints of the site. The Project will clear no more than 110 ha of native vegetation within the 256.9 ha DE. Clearing is required for the following:

- Geotechnical surveys,
- Solar arrays, battery storage, laydown and construction areas, and ancillary infrastructure,
- Network connection infrastructure and access tracks.

3.2 Proposed Clearing Method

Geotechnical survey works will consist of mainly incidental clearing (driving over and parking on native vegetation) for vehicle / machinery access to test sites. Geotechnical tests will require the mechanical removal of native vegetation. Topsoil and vegetation will be respread over each test location once complete.

Clearing for the solar arrays, network connection and associated infrastructure will be undertaken via mechanical removal.

4 Biological Survey

Horizon Power commissioned SLR to conduct a detailed (single season) flora and vegetation survey and a Targeted and Basic fauna survey in 2025 (SLR, 2025) to gain an understanding of the flora, vegetation and fauna values within and surrounding the DE. The biological survey was undertaken in accordance with the Environmental Protection Authority (EPA) guidelines (EPA, 2016 and EPA, 2020) and is summarised in **Table 4-1**.

Table 4-1 Summary of Biological Surveys Relevant to the DE

Survey	Summary of Findings
Carnarvon Decarbonisation Project Flora, Fauna, and Vegetation Assessment (SLR, 2025) IBSA-2025-0371	**Survey Dates:** 7 - 9 April 2025 **Survey Area**: 257.153425 ha, encompasses the solar facility, network connection route portion of the DE and south of exiting power station site (**Figure 2**). **Flora / Vegetation Findings:** **Flora and vegetation** - No State or Commonwealth listed Threatened or Priority Ecological communities were recorded in the Survey Area. None were considered likely to occur. - No State or Commonwealth listed Threatened or Priority flora were recorded. No State or Commonwealth listed Threatened or Priority flora were considered likely to occur following the completion of the survey. - Landforms present included floodplains, drainage lines, and dune crests, all on sandy-clay soils. - Two vegetation types, EvEaCc and NpRlCc, may support terrestrial groundwater dependent ecosystems. Both vegetation types support *Eucalyptus victrix*, which may rely on groundwater when surface water resources are scarce. - Three vegetation types associated with major and minor drainage lines were recorded. - The majority of the Survey Area is associated with floodplain vegetation. - Vegetation condition ranged from Completely Degraded to Poor. **Fauna and habitat** - Five fauna habitats were mapped within the Survey Area. All habitats within the Survey Area were heavily degraded. Of the habitats identified the *Eucalyptus victrix* Drainage and Cenchrus Dune Crest habitats may provide the greatest value to fauna. - No State or Commonwealth listed Threatened or Priority fauna were identified in the Survey Area. Nine marine birds listed under the *Environmental Protection and Biodiversity Conservation Act 1999* were recorded. - One significant fauna taxon was assessed as having a high likelihood of occurring within the Survey Area, Peregrine Falcon (*Falco peregrinus*), listed as Other Specially protected by the Department of Biodiversity Conservation and Attractions (DBCA). - 17 bird species listed as Threatened or Migratory are considered possibly occurring in the Survey Area. **Site condition** - Land use within the Survey Area is historically associated with pastoral use. Contemporary land use within the vicinity of the Survey Area includes infrastructure development for petrol stations and a road train assembly area to the north, and Mungullah Power Station to the east. - The survey area was heavily impacted by weeds, with over 20 species recorded. Two weeds of National Significance were identified. - Evidence of vehicle tracks, previously cleared areas, infrastructure, grazing and high levels of illegal dumping were recorded.

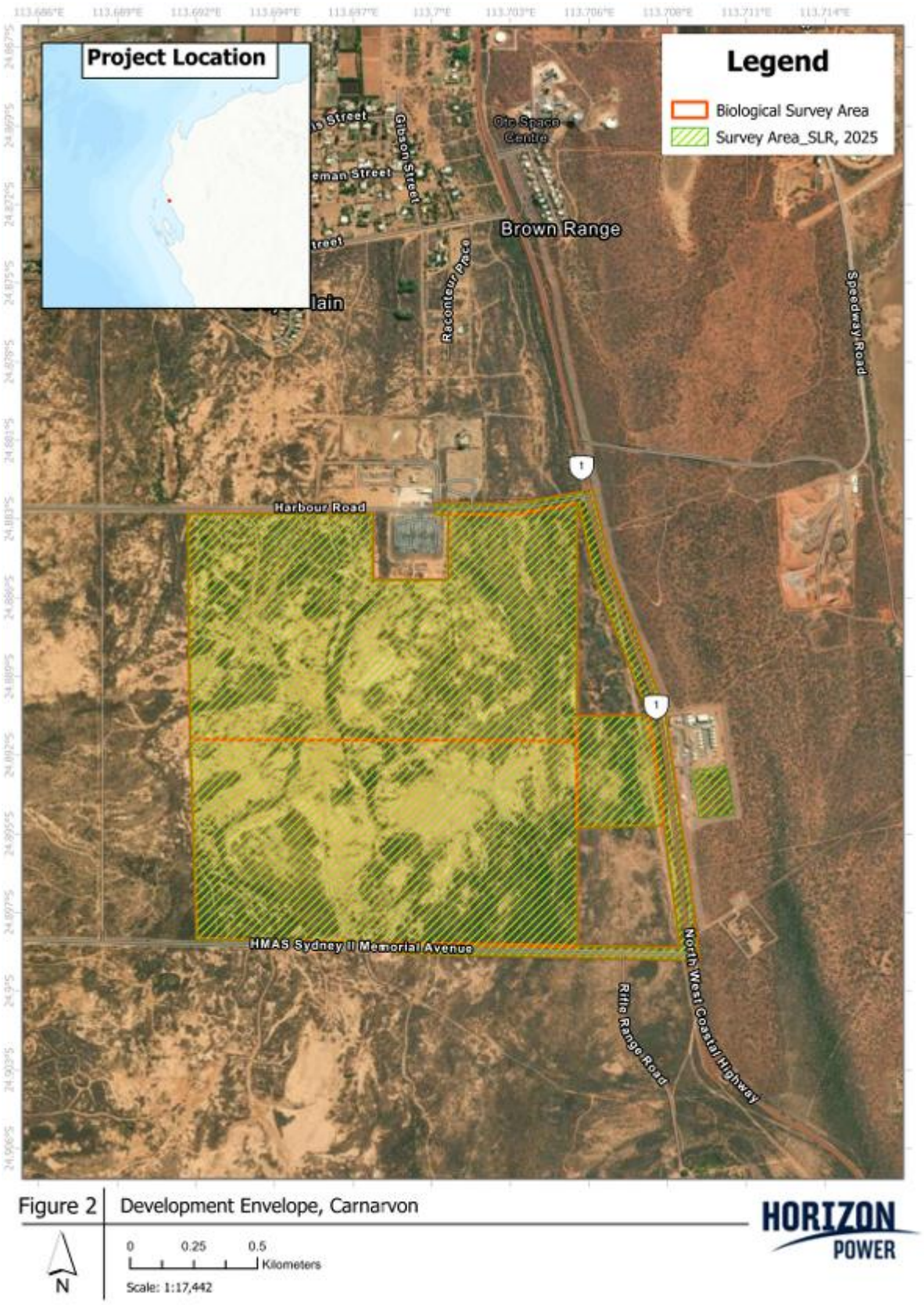


Figure 2 Biological Survey Area

5 Existing Environment

The existing environment is summarised in **Table 5-1**.

Table 5-1 Existing environment

<table>
<tr><th>Environmental value</th><th>Assessment</th></tr>
<tr><td>Vegetation associations, types and condition</td><td>
The project is located within Pre-European Vegetation Associations Gascoyne Marshes 205 and Gascoyne Marshes 308. More than 99% of this vegetation association remains at a local and regional level.
<table>
<tr><th>Vegetation association</th><th>Scale</th><th>Pre-European extent (ha)</th><th>Current extent (ha)</th><th>% Remaining</th><th>% of current extent in all DBCA managed land (proportion of current extent)</th></tr>
<tr><td rowspan="4">Gascoyne Marshes 205</td><td>State: WA</td><td>11,501.99</td><td>11,390.85</td><td>99.03</td><td>0.01</td></tr>
<tr><td>IBRA Bioregion: Carnarvon</td><td>11,501.99</td><td>11,390.85</td><td>99.03</td><td>0.01</td></tr>
<tr><td>IBRA Subregion: Wooramel</td><td>11,501.99</td><td>11,390.85</td><td>99.03</td><td>0.00</td></tr>
<tr><td>LGA: Shire of Carnarvon</td><td>11,501.99</td><td>11,390.85</td><td>99.03</td><td>0.00</td></tr>
<tr><td rowspan="4">Gascoyne Marshes 308</td><td>State: WA</td><td>445,285.16</td><td>441,720.61</td><td>99.20</td><td>0.06</td></tr>
<tr><td>IBRA Bioregion: Carnarvon</td><td>445,197.57</td><td>441,704.55</td><td>99.22</td><td>0.06</td></tr>
<tr><td>IBRA Subregion: Wooramel</td><td>445,197.57</td><td>441,704.55</td><td>99.22</td><td>0.88</td></tr>
<tr><td>LGA: Shire of Carnarvon</td><td>445,099.12</td><td>441,534.57</td><td>99.20</td><td>0.88</td></tr>
</table>
Six native vegetation types were defined and mapped in the DE, not including cleared areas or Non-vegetated Clay Flat (SLR, 2025). The SLR (2025) survey report identified vegetation condition ranging from Poor to completely degraded as follows:
<table>
<tr><th>Vegetation type</th><th>Extent (ha) within DE</th><th>Extent (%) within DE</th></tr>
<tr><td>AsRlCc</td><td>1.38</td><td>0.54</td></tr>
<tr><td>NpRlCc</td><td>7.34</td><td>2.88</td></tr>
<tr><td>EvEaCc</td><td>7.90</td><td>3.10</td></tr>
<tr><td>AtRlCc</td><td>15.11</td><td>5.93</td></tr>
<tr><td>RlAvCc</td><td>149.77</td><td>58.75</td></tr>
<tr><td>TdCsCc</td><td>5.43</td><td>2.13</td></tr>
<tr><td>Non-vegetated Clay Flat</td><td>58.03</td><td>22.76</td></tr>
<tr><td>Cleared</td><td>10.18</td><td>3.99</td></tr>
<tr><td>TOTAL</td><td>255.15</td><td>100%</td></tr>
</table>
</td></tr>
</table>

<table>
<tr><th>Environmental value</th><th>Assessment</th></tr>
<tr><td>Fauna habitat</td><td>The SLR (2025) survey identified six broad habitat types within the DE. Fauna habitat and condition is detailed below:
<table>
<tr><th>Fauna habitat</th><th>Habitat value</th><th>Extent (ha) within DE</th><th>Extent (%) within DE</th></tr>
<tr><td>Cenchrus Clay Flats</td><td>High</td><td>155.20</td><td>60.83</td></tr>
<tr><td>Cenchrus Drainage</td><td>Medium</td><td>15.11</td><td>5.92</td></tr>
<tr><td>Cenchrus Dune Crest</td><td>High</td><td>1.38</td><td>0.54</td></tr>
<tr><td>Eucalyptus victrix Drainage</td><td>High</td><td>7.90</td><td>3.10</td></tr>
<tr><td>Mesquite Drainage</td><td>High</td><td>7.34</td><td>2.88</td></tr>
<tr><td colspan="2">Cleared / Non-vegetated Clay Flats</td><td>68.21</td><td>26.73</td></tr>
<tr><td colspan="2">Total</td><td>255.15</td><td>100%</td></tr>
</table></td></tr>
<tr><td>Significant fauna</td><td>The SLR (2025) survey did not record any conservation significant fauna species within the DE or in close vicinity to the DE, however a post-survey likelihood assessment identified the Peregrine Falcon (Falco peregrinus) listed as Other Specially protected by DBCA as having a high likelihood of occurring within the Survey Area.

The following species were identified as having a medium likelihood to occur within the SLR (2025) survey area:
- Curlew Sandpiper (Calidris ferruginea), listed as Critically Endangered under the BC Act and Critically Endangered, Migratory under the EPBC Act.
- Lesser Sand Plover (Charadrius mongolus), listed as Endangered, Migratory under the EPBC Act.
- Australian Painted Snipe (Rostratula australis), listed as Endangered under the BC Act and Migratory under the EPBC Act.
- Common Sandpiper (Actitis hypoleucos), listed as Endangered under the BC Act and Migratory and under the EPBC Act.
- Common Greenshank (Tringa nebularia), listed as Migratory under the BC Act and Endangered, Migratory under the EPBC Act.
- Western Spiny-tailed Skink (Egernia stokesii badia), listed as Vulnerable under the BC Act and Endangered under the EPBC Act.
- Greater Sand Plover (Charadrius leschenaultii), listed as Vulnerable under the BC Act and Vulnerable, Migratory under the EPBC Act.
- Grey Falcon (Falco hypoleucos), listed as Vulnerable under the BC Act and EPBC Act.
- Sharp-tailed Sandpiper (Calidris acuminata), listed as Migratory under the BC Act and Vulnerable, Migratory under the EPBC Act.
- 1Pacific Swift (Apus pacificus), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Pacific Golden Plover (Pluvialis fulva), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Osprey (Pandion haliaetus), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Red-necked Stint (Calidris ruficollis), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Long-toed Stint (Calidris subminuta), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Wood Sandpiper (Tringa glareola), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Marsh Sandpiper (Tringa stagnatilis), listed as Migratory under the BC Act and Migratory under the EPBC Act.
- Glossy Ibis (Plegadis falcinellus), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act.</td></tr>
</table>

Environmental value	Assessment
	Post survey, the development envelope has been designed to avoid the minor drainage line habitat, where these species may occur. As these three species are considered unlikely to occur within the habitat types present within the DE, they are not discussed further within this document.
Significant ecological linkage	The fauna habitats within the DE are part of a contiguous, largely intact area of remnant vegetation present in Carnarvon. Land within the Carnarvon township has been subject to clearing, but this clearing is minimal and much of the remnant vegetation is intact in the local area. Overall, the habitats within the DE are largely contiguous through the local area.
Ecological communities	No State or Commonwealth listed TECs or PECs were recorded within the DE (SLR, 2025). None of the vegetation types delineated within the Survey Area were analogous to nearby Threatened or Priority Ecological Communities.
Significant flora	The EPBC Act Protected Matters Search Tool (PMST), NatureMap and DBCA Threatened and Priority flora databases identified the presence/potential presence of significant flora taxa within a 20 km buffer of the Survey Area (SLR, 2025). No EPBC listed flora were recorded during the field survey (SLR, 2025). No Threatened or Priority flora taxa were recorded within the Survey Area (SLR, 2025). Prior to the survey, 38 significant flora taxa were recorded within 100 km of the Survey Area as part of the Desktop Assessment. Of these, none were classified as Threatened, five as Priority 1, ten as Priority 2, 21 as Priority 3, and two as Priority 4. Significant flora within the DE is discussed further in **Section 7**.
Wetlands and/or waterways	One Rights in Water and Irrigation Act 1914 (RIWI Act) area overlaps the DE (GoWA, 2026). The DE overlaps the RIWI Act Proclaimed Surface Water Area (Gascoyne River and Tributaries) (GoWA, 2026). The DE does not overlap with a water reserve protection plan (DBCA-011 Legislated Lands and Waters). Water required for construction activities (e.g. dust suppression, civil works and concrete batching) is expected to be sourced via trucking in water from local or regional sources. Operational water demand will be minimal and primary for equipment cleaning and routine maintenance and will be sourced from truck in water and/or rainwater tanks. No RAMSAR wetlands are present within or near the Survey Area. A Directory of Important Wetlands site, associated with the McNeil Claypan System is located approximately 1 km east of the Survey Area. Aerial imagery indicates that two non-perennial minor drainage channels intersect the Survey Area. Both are minor drainage lines that are disrupted by infrastructure within the surrounding area. A flood risk assessment by GHD, 2025 concluded that both current and future climate scenarios indicate that floodwaters from the 1 in 100 AEP storm event would mainly pass through the eastern portion of the DE, with a minor flow path at the northwest. They recommended levees, land grading or excavation of open channels to manage flows. Once the design is finalised, further investigation into surface water flows/flood risk is required to ensure impacts are not significant. Digging is estimated to a depth of 2 m for the solar infrastructure, 3 m for underground cable and 2 m depth for transmission poles. The GHD (2025) assessment used bores approximately 5 km from the DE, with groundwater between 3 to 4 m. Therefore, there is a risk of construction activities intercepting groundwater. Acid sulfate soil testing will be undertaken during geotechnical investigations if warranted, if detected an acid sulfate soil management plan approved by DWER will be commissioned. Due to standard construction measures, impacts to inland waters are not expected to be significant.
Water resources	The DE does not overlap any Public Drinking Water Source Areas (PDWSA) (GoWA, 2026), Carnarvon Water reserve (Priority 1) is the closest PDWSA and is located approximately 11 km north-east of the DE. Standard mitigation measures are outlined in the EMP and no additional impacts are expected to the water reserve.
Conservation Reserves	No conservation reserves or estates were identified within the DE, Shark Bay National Heritage listed place is located within the surrounding 20 km buffer zone (approximately 3.5 km south of the DE).
Environmentally Sensitive Areas	The nearest Environmentally Sensitive Area is located approximately 750 m east of the DE (Object ID 3077).

Environmental value	Assessment
Land and soil quality	The DE is located within the Brown and Delta land system, described as (DPIRD, 2022): *Brown System: Sandy plains with sparse longitudinal dunes, supporting tall Acacia spp. Shrublands* *Delta System: Flood plains and minor sand banks, supporting low shrublands of bluebush (Maireana spp.) and saltbush (Atriplex spp.)* The GHD (2025) flood assessment did investigate Acid Sulphate Soils (ASS) concluded that the presence of ASS during construction is not anticipated. However, should be investigated prior to construction. Standard management will be applied to prevent any risk of contamination. Acid sulfate soil, salinity and contamination risks are considered manageable but require further investigation prior to construction. The available desktop information indicates that acid sulfate soils are not anticipated to be encountered during construction however, this will be confirmed through geotechnical investigations, particularly where excavations may intersect shallow groundwater. Saline soils and/or saline groundwater may be present given the floodplain setting, sandy-clay soils and observed salinity indicators within the DE. Salinity risks will be considered during detailed design, excavation planning, dewatering assessment, material reuse and construction water planning. The DE also intersects a suspected potentially contaminated site (DWERVT13755) and evidence of illegal dumping has been recorded within the broader Survey Area. A Detailed Summary of Records and baseline contamination investigation will be undertaken to confirm the nature and extent of contamination risk. On ground investigations are being undertaken in July 2026 to assess potential contamination issues, if verified a site management plan specific to contamination will be commissioned to address this. Where contamination, acid sulfate soils or saline water/soil conditions are identified, appropriate management measures will be implemented through the CEMP and/or a specific management plan prior to disturbance.
Environmental heritage	Shark Bay World Heritage listed place is located within the surrounding 20 km buffer zone (approximately 3.5 km south of the DE).
Air quality	Air quality impacts associated with the Project are expected to be temporary and manageable. The primary air quality risk during construction is dust generation from clearing, vehicle movements, grading, excavation, trenching, stockpiling and material handling. The SLR (2025) biological survey identified floodplains, drainage lines and dune crests on sandy-clay soils within the Survey Area, with large areas of clay flats and degraded or previously disturbed ground. These soil and surface conditions may generate dust when disturbed, particularly during dry or windy conditions. No significant sensitive receptors are located directly adjacent to the DE and any dust impacts are expected to be localised and limited to the construction phase. Dust will be managed in accordance with the CEMP through standard construction controls, including water carts or other dust suppression methods, stabilisation or covering of stockpiles where required, vehicle speed limits, use of designated access tracks, minimising disturbed areas and temporary cessation or modification of dust-generating works during adverse weather conditions if required. Operational air emissions are expected to be minimal, with the Project supporting a reduction in greenhouse gas emissions by enabling increased renewable energy generation within the Carnarvon electricity network. With implementation of standard management measures, significant impacts to air quality are not expected.
Amenity values	The Project has the potential to impact on visual amenity of the local area. However, the proposed infrastructure is consistent with existing infrastructure in the region. There are also potential impacts through dust, noise and vibration. However, these will be temporary in nature and limited to the construction phase of the Project. Standard mitigation measures will be implemented and are outlined in the EMP.

6 Avoidance, Mitigation and Management Measures

6.1 Avoidance

Initial avoidance and minimisation measures were undertaken during early planning works and selection.

A desktop phase was undertaken during project scoping, to determine sites that might be suitable for the proposed works. A number of sites were considered and discarded due to proximity to waterways and/or Public Drinking Water Source Areas.

The biological survey covered a slightly larger extent than the DE within Carnarvon and was undertaken to inform environmental constraints and aid site selection for the Proposed Action. The DE for the Proposed

Action was selected as it presented the fewest environmental constraints and comprised the most degraded habitat. Selection and refinement of the DE has allowed impacts to higher-value drainage-line habitat and vegetation that may support terrestrial groundwater dependent ecosystems to be avoided as far as practicable.

All habitats within the Survey Area were identified as heavily degraded. Of the habitats identified, *Eucalyptus victrix* Drainage and Mesquite Drainage may provide the greatest value to fauna and may support terrestrial groundwater dependent ecosystems. These habitat types have been prioritised for avoidance through the final DE design. The mapped avoidance areas will be avoided for the Project, with the exception of the network connection corridor, which may require disturbance of up to 0.08 ha within an avoidance area. This minor disturbance is considered insignificant due to the very small extent of impact and the degraded condition of habitat within the Survey Area.

Cenchrus Clay Flats habitat may support fauna during wetter months; however, this habitat type covers the majority of the Survey Area and cannot be avoided through site placement.

Impact reduction actions undertaken for this Project include:

- Selection of the DE in an area with the fewest environmental constraints and the most degraded habitat;
- Avoidance of mapped avoidance areas, higher-value drainage-line habitat and vegetation that may support terrestrial groundwater dependent ecosystems where practicable;
- Refinement of the Project layout to limit disturbance within avoidance areas to the network connection corridor, with disturbance expected to be no more than 0.08 ha; and
- Selection of a site close to the existing power station to reduce clearing required for connection infrastructure.

6.2 Mitigation and Management

An EMP has been developed for the Project which lists the specific mitigation and management measures to be applied during construction of the Project (see Appendix A). Key management measures for the geotechnical works and Project infrastructure include the following:

- No clearing is permitted outside the DE.
- Clearing impacts will be further reduced through the detailed design process, including the positioning of solar and BESS facility infrastructure and network connection infrastructure to minimise impacts to vegetation and flora and fauna habitat.
- The clearing locations are to be demarcated with flagging tape, GPS or similar prior to clearing activities.
- Clearing areas are to be checked by an Environmental Specialist or Site Supervisor prior to clearing to ensure no more than 110 ha of clearing is undertaken for the Project.
- A pre-clearing environmental toolbox will be held so all staff are aware of their responsibilities under the permit.
- Clearing of native vegetation will be undertaken in a slow, progressive manner in one direction to allow fauna to move away from the clearing area.
- Movement of vehicles and machinery will be in convoy along access tracks/ routes and will not go into adjacent vegetation.
- Vehicles and machinery will arrive clean and weed control will be undertaken at the site post-construction as required.
- Dust, noise, vibration and light management measures will be implemented during construction.
- Any water abstraction required for construction of the Project will be undertaken to minimise drawdown, and water allowed to reinfiltrate as close to the source as possible.
- Weather will be monitored to avoid construction works during heavy rainfall to prevent runoff, erosion and mobilisation of sediment.

7 Assessment Against the 10 Clearing Principles

An assessment against the 10 Clearing Principles outlined by DWER (2014) has been undertaken to support the NVCP application for the Project, as presented in **Table 7-1**. The assessment found that the proposed clearing of native vegetation for the Project is considered unlikely to be at variance to any of the ten clearing principles.

Table 7-1 Assessment Against the 10 Clearing Principles

Principle	Assessment	Outcome
(a) Native vegetation should not be cleared if it comprises a high level of biological diversity.	Up to 110 ha of native vegetation is proposed to be cleared for the Project within the DE. **Vegetation** The DE is located in the Carnarvon bioregion. The DE is predominantly made up of RlAvCc, which is described as (SLR, 2025): "Rhagodia latifolia subsp. latifolia, Scaevola spinescens, and Acacia tetragonophylla mid sparse shrubland over Atriplex vesicaria and Atriplex semilunaris low sparse shrubland over *Cenchrus ciliaris and *Cenchrus setiger low tussock grassland." No TECs or PECs listed under the EPBC Act or BC Act were identified within the DE. **Flora** 74 flora taxa from 27 families and 59 genera (including subspecies and variants) were recorded within the Survey Area (SLR, 2025). No EPBC Act or BC Act listed flora were recorded. No DBCA listed P3 flora taxa were recorded within the Survey Area. No other significant flora species were identified as likely to occur post-survey. Some landforms and soil types recorded within the Survey Area are known to be suitable habitat for nearby significant flora taxa. However, the highly modified vegetation types recorded within the Survey Area are not suitable for significant flora taxa. Numerous aggressive weed taxa (*Cenchrus ciliaris, *Cenchrus setiger, *Neltuma pallida) have colonised the Survey Area, outcompeting native flora. Twenty of the 74 flora taxa were introduced flora taxa. The most abundant genus was Acacia (four flora taxa). The most diverse families were Poaceae (13 taxa), Chenopodiaceae (11 taxa), and Fabaceae (six taxa). Two Weeds of National Significance (WoNS) or Declared Pests were recorded within the Survey Area and are addressed in the CEMP. **Fauna and fauna habitat** Six fauna habitats were identified within the DE (SLR, 2025). – Cenchrus Clay Flats – Cenchrus Drainage – Cenchrus Dune Crest – Cleared/Non-vegetated Clay Flats – Eucalyptus victrix Drainage – Mesquite Drainage All habitat types are considered to be poor to completely degraded value habitat for fauna known or likely to be present within the DE (SLR, 2025). Up to 110 ha of native vegetation is proposed to be cleared for the Project. This vegetation is considered to be well represented locally and regionally, with biological diversity commensurate with the surrounding region. There is approximately 94,825 ha of native vegetation within a 20 km radius of the DE. Given the proposed clearing in poor to completely degraded habitat, the works are unlikely to be at variance with this principle.	Unlikely to be at variance.

(b) Native vegetation should not be cleared if it comprises the whole or part of, or is necessary for the maintenance of, a significant habitat for fauna indigenous Western Australia.	Six fauna habitat types were identified in the DE (SLR, 2025): – Cenchrus Clay Flats – Cenchrus Drainage – Cenchrus Dune Crest – Cleared/Non-vegetated Clay Flats – Eucalyptus victrix Drainage – Mesquite Drainage A total of 31 species (19 birds, 2 mammals, 3 reptiles and no amphibians were identified within the survey area. One significant fauna taxon was assessed as having a high likelihood of occurring within the Survey Area, Peregrine Falcon (*Falco peregrinus*), listed as Other Specially protected by the DBCA, however was not observed during the survey. This significant species including habitat preferences are described below. **Peregrine Falcon** The Peregrine Falcon is an uncommon but wide-ranging bird across Australia (Barrett et al., 2003). It occurs mainly along rivers and ranges as well as wooded watercourses and lakes. It nests primarily on cliffs, granite outcrops and quarries, although is also known to occupy existing raptor and corvid stick nests (Menkhorst et al., 2017). The diet of the Peregrine Falcon has been well studied and primarily includes flocking species such as parrots, pigeons and on the east coast, European Starlings (Olsen and Fuentes, 2008). Although not recorded during the field survey, the Peregrine Falcon has been recorded recently within the Desktop Study Area and has a high liklihood of occuring within the Survey Area. Within the Survey Area, the Eucalyptus victrix Drainage constitutes potential nesting habitat, while all other fauna habitats may be used for hunting. The taxon may be transient within the Survey Area, with more suitable treelined watercourse habitat located 2.9 km north of the Survey Area. Up to 110ha of falcon habitat may be cleared for the project. There is approximately 94,825 ha of suitable habitat for the falcon within 20km radius, all pre-european vegetation types have been included due to the falcon's diverse hunting areas, the clearing makes up 0.1% of this habitat. This impact is considered not significant. 17 significant fauna taxa were assessed as having a medium likelihood of occurring within the DE: - Curlew Sandpiper (Calidris ferruginea), listed as Critically Endangered under the BC Act and Critically Endangered, Migratory and Marine under the EPBC Act. - Lesser Sand Plover (Charadrius mongolus), listed as Endangered, Migratory and Marine under the EPBC Act. - Australian Painted Snipe (Rostratula australis), listed as Endangered under the BC Act and Migratory and Marine under the EPBC Act. - Common Sandpiper (Actitis hypoleucos), listed as Endangered under the BC Act and Migratory and Marine under the EPBC Act. - Common Greenshank (Tringa nebularia), listed as Migratory under the BC Act and Endangered, Migratory and Marine under the EPBC Act. - Western Spiny-tailed Skink (Egernia stokesii badia), listed as Vulnerable under the BC Act and Endangered under the EPBC Act. - Greater Sand Plover (Charadrius leschenaultii), listed as Vulnerable under the BC Act and Vulnerable, Migratory and Marine under the EPBC Act.	Unlikely to be at variance.

Principle	Assessment	Outcome
	- Grey Falcon (Falco hypoleucos), listed as Vulnerable under the BC Act and EPBC Act. - Sharp-tailed Sandpiper (Calidris acuminata), listed as Migratory under the BC Act and Vulnerable, Migratory and Marine under the EPBC Act. - Pacific Swift (Apus pacificus), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Pacific Golden Plover (Pluvialis fulva), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Osprey (Pandion haliaetus), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Red-necked Stint (Calidris ruficollis), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Long-toed Stint (Calidris subminuta), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Wood Sandpiper (Tringa glareola), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Marsh Sandpiper (Tringa stagnatilis), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. - Glossy Ibis (Plegadis falcinellus), listed as Migratory under the BC Act and Migratory and Marine under the EPBC Act. The Eucalyptus victrix Drainage has been identified as being supportive of Peregrine Falcon habitat, this area has been avoided for clearing in the DE except for the connection corridor expected to be no more than 0.08 ha which is considered insignificant due to habitat condition. Overall, the fauna values of the DE are highly represented on a local and regional scale (SLR, 2025) and clearing of up to 110 ha of fauna habitat is not considered significant. The Project is therefore unlikely to be at variance with this principle.	
(c) Native vegetation should not be cleared if it includes, or is necessary for the continued existence of, rare flora.	SLR (2025) undertook a detailed assessment for flora and vegetation in April 2025. The survey timing (April) was considered appropriate for the Northern botanical province (typically January to March) due to adequate rainfall in the region. No Threatened or Priority flora were recoded within the Survey Area pursuant to both the EPBC Act 1999 and BC Act 2016. SLR (2025) undertook a likelihood of occurrence assessment post-field survey and concluded a low likelihood of occurrence for Threatened flora was considered within the Survey Area. Native vegetation necessary for the continued existence of rare flora is not considered to occur within the Survey Area. The proposed clearing of native vegetation for the Project is therefore not considered to be at variance with this principle.	Unlikely to be at variance.
(d) Native vegetation should not be cleared if it comprises the whole or a part of, or is necessary for the maintenance of, a threatened ecological community.	The SLR (2025) survey did not record any threatened or priority ecological communities listed under the EPBC Act, BC Act or by DBCA, nor were any considered likely to occur. None of the vegetation types delineated across the Survey Area were analogous to Threatened Ecological Communities or Priority Ecological Communities. Therefore, the proposed clearing of native vegetation for the Project is not considered to be at variance with this principle.	Unlikely to be at variance.

Principle	Assessment	Outcome
(e) Native vegetation should not be cleared if it is significant as a remnant of native vegetation in an area that has been extensively cleared.	The two vegetation associations within the DE have more than 99% pre-European extent remaining - Gascoyne marshes 205 & 308. The DE is considered to be within an area that has been extensively cleared given that it has more than 99% of pre-European extent. This vegetation forms part of a large continuous tract of habitat and has a high degree of habitat connectively with surrounding vegetation, which has similar or better condition vegetation. The vegetation types identified during the survey is not confined to the Survey Area and is considered well represented in the local and regional area. Therefore, it is considered that the native vegetation proposed to be cleared for the Project is not significant as a remnant of native vegetation within an area that has more than 99% representation.	Unlikely to be at variance.
(f) Native vegetation should not be cleared if it is growing in or in association with a watercourse or wetland.	There are no wetland features present within the DE (SLR, 2025). No Ramsar wetlands are present within or near the Survey Area. The nearest Directory of Important Wetlands site is the McNeil Claypan System, located approximately 1 km east of the Survey Area. Aerial imagery indicates that two non-perennial minor drainage channels intersect the Survey Area, however, these drainage features are disrupted by existing infrastructure in the surrounding area. Two vegetation types associated with drainage lines, *Eucalyptus victrix* Drainage and Mesquite Drainage, may support terrestrial groundwater dependent ecosystems. These vegetation types are considered to provide the greatest drainage-line and potential groundwater dependent ecosystem values within the Survey Area. The DE has avoided 7.90 ha of *Eucalyptus victrix* Drainage and 7.34 ha of Mesquite Drainage, and these areas are not expected to be impacted by the Project. Cenchrus Drainage has not been identified as being associated with groundwater dependent ecosystems and has therefore been excluded from the avoidance areas. The Project cannot fully avoid Cenchrus Clay Flats and Cenchrus Drainage because these habitats comprise a substantial proportion of the DE and occur broadly across the available development area. Cenchrus Clay Flats comprise approximately 155.20 ha, or 60.83% of the DE, and Cenchrus Drainage comprises approximately 15.11 ha, or 5.92% of the DE. While Cenchrus Drainage is associated with minor drainage features, it does not represent the higher-value drainage-line vegetation identified within the Survey Area and is not considered to support terrestrial groundwater dependent ecosystem values. The SLR (2025) survey identified that all fauna habitats within the Survey Area are heavily degraded as a result of anthropogenic disturbance, including weeds, illegal dumping, vehicle tracks and litter. Vegetation condition across the Survey Area ranged from Completely Degraded to Poor, with the majority mapped as Degraded. These existing disturbances reduce the environmental value and ecological function of the vegetation associated with the minor drainage features. Cenchrus Clay Flats and Cenchrus Drainage are associated with clay and sandy-clay substrates that may retain water following rainfall and during wetter months. When seasonally inundated, these areas may provide temporary foraging, sheltering and roosting opportunities for wetland birds and migratory waders. However, these habitats are degraded, temporary in nature and are unlikely to represent critical habitat given the availability of more suitable wetland, coastal and riparian habitats nearby, including the McNeil Claypan System and other coastal and wetland habitats in the broader locality. The proposed clearing may be at variance with the principle to the extent that some vegetation associated with minor, non-perennial drainage features may be cleared. However, the impact is considered manageable and not significant, given there are no wetlands within the DE, higher-value drainage-line and potential groundwater dependent ecosystem vegetation has been avoided, the affected Cenchrus habitats are degraded and widespread within the DE, and standard construction management measures will be implemented to manage erosion, sedimentation, weeds, contamination, surface water flow and seasonal inundation risks.	May be at variance.

Principle	Assessment	Outcome
(g) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause appreciable land degradation.	The DE does not intersect with any mapped ESAs. A significant portion of the DE is Cenchrus Clay Flats and Cleared/Non-vegetated Clay Flats, prone to degradation and is of poor to degraded value, and is susceptible to erosion.te The DE contains soils which may be susceptible to erosion. However, standard management practices will be implemented to prevent erosion. Additionally, the DE is located in an area which has previous disturbance and flooding with vast cleared areas. The Project will incorporate standard construction management measures to reduce the risk of soil erosion as a result of ground disturbance and clearing (Appendix A). Any dust produced during construction will also be managed through the implementation of a EMP. Given that the area is already degraded, the project is considered to be an improvement on the management of the site, it is not likely that the clearing will cause appreciable land degradation. Based on the above, the proposed clearing of native vegetation for the Project is not considered to be at variance with this principle.	Unlikely to be at variance.
(h) Native vegetation should not be cleared if the clearing of the vegetation is likely to have an impact on the environmental values of any adjacent or nearby conservation area.	There are no conservation areas overlapping the DE. Shark Bay conservation area is located within 3.5km of the DE. No impacts to conservation areas are anticipated in association with the Project. No off-site impacts are anticipated as a result of the proposed clearing of native vegetation within the DE. It is noted that management measures regarding weeds and disease will be implemented to ensure that weeds are not spread as a result of clearing activities (Appendix A). The proposed clearing is not expected to impact any adjacent conservation areas.	Unlikely to be at variance.
(i) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause deterioration in the quality of surface or underground water.	The DE is within the Carnarvon sub-catchment of the broader Gascoyne River Catchment (DWER, 2026). The Gascoyne River is ephemeral (i.e., flows only after rain and is dry for most of the year. The Gascoyne River is located approximately 2.8 km north of the Study Site. Aerial imagery indicates that two non-perennial minor drainage channels intersect the Survey Area. Both are minor drainage lines that are disrupted by infrastructure within the surrounding area. No permanent water bodies or drainage lines are located within the DE. The DE does not intersect with any Public Drinking Water Source Area (PDWSA). The DE does not intersect with any groundwater areas proclaimed under the *Rights in Water and Irrigation Act 1914* (RIWI Act). Digging is estimated to a depth of 2 m for the solar infrastructure, 3 m for underground cable and 2 m depth for transmission poles. The GHD (2025) assessment used bores approximately 5 km from the DE, with groundwater between 3 to 4 m. A groundwater risk assessment will be conducted to assess construction activities intercepting groundwater as described in the CEMP. Once the Proposal design is further defined, geotechnical investigations and a groundwater assessment will be undertaken which includes ASS sampling, saline water and acidic water to identify dewatering risks. Two vegetation types, EvEaCc and NpRICc may support terrestrial groundwater dependent ecosystems. Both vegetation types support *Eucalyptus victix*, a facultative phreatophyte, which may rely on groundwater when surface water resources are scarce. Up to 15.2 ha of this potential groundwater dependent ecosystem will be cleared for the Proposal. Due to standard construction measures, impacts to inland waters are not expected to be significant. Potential impacts to surface water quality from erosion / sedimentation / hydrocarbons will be managed in accordance with the EMP. Clearing within the DE is unlikely to cause deterioration in the quality of surface or underground water, therefore the Project is unlikely to be at variance to this principle.	Unlikely to be at variance.

Principle	Assessment	Outcome
(j) Native vegetation should not be cleared if the clearing of the vegetation is likely to cause, or exacerbate, the intensity of flooding.	The DE has been identified as a flood prone risk area. Flood mitigation strategies will be considered once the Proposal design is further refined and flood studies completed. The proposed clearing are not expected to exacerbate the intensity of flooding, given the pre-existing site conditions. A surface water risk assessment will be conducted to assess flooding impacts to the project. Therefore, the proposed clearing of native vegetation for the Project is not considered to be at variance with this principle.	Unlikely to be at variance.

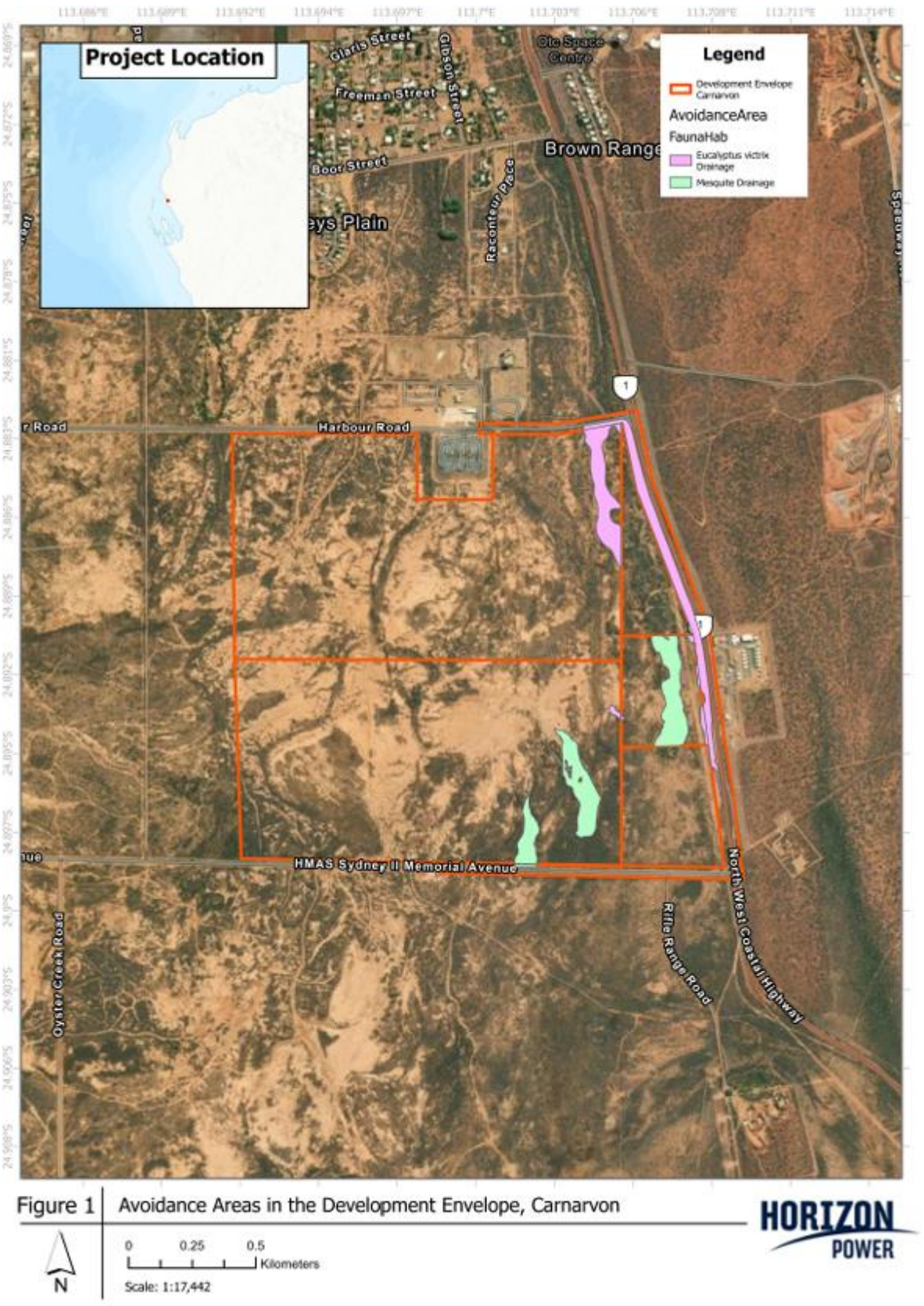


Figure 3 Environmental constraints

8 Other matters

8.1 Land Planning

The project will be considered Public Works and is expected to be exempt from development approval under Section 6 of the Planning and Development Act 2005; however, due regard is required with respect to:

- The purpose and intent of any planning scheme that has effect in the locality where, and at the time when, the right is exercised;
- The orderly and proper planning, and the preservation of the amenity, of that locality at that time; and
- Any advice provided by the responsible authority in the course of the consultation required.

8.2 Other approvals

In considering a clearing matter under section 51O of the *Environmental Protection Act 1986* (EP Act), the Department of Water and Environmental Regulation (DWER) CEO shall have regard to any planning instrument and other relevant matters when making decisions as to clearing permits. 'Other matters' are not defined in the *Environmental Protection Act 1986* (EP Act) and consequently are any matters the CEO considers relevant. Other matters are generally environmental issues not directly within the scope of the clearing principles, but within the object and principles of the Act. Other approvals that may apply to this Project are detailed **Table 8-1**. Land access is detailed in **Section 2.3**.

Table 8-1 Other Approvals

Other approvals	Assessment
Referral to Environmental Protection Authority	Due to the small scale of the project, it is considered that all environmental impacts can be managed under Part V of the EP Act, and referral to the EPA is not considered necessary.
Referral to Department of Climate Change, Energy, the Environment and Water (DCCEEW)	Referral to the Department of Climate Change, Energy, the Environment and Water under the *Environment Protection and Biodiversity Conservation Act 1999* is not proposed. The SLR (2025) survey did not record any Commonwealth listed threatened flora, threatened fauna or threatened ecological communities within the Survey Area, and no listed threatened species or communities were considered likely to be significantly impacted by the Project. A number of EPBC Act listed migratory and marine bird species were assessed as possibly occurring within the Survey Area, however, the habitat present within the DE is degraded, temporary in nature and unlikely to represent important habitat, particularly given the availability of more suitable wetland, coastal and riparian habitat in the broader locality. On this basis, the Project is not expected to have a significant impact on Matters of National Environmental Significance and referral under the EPBC Act is not considered necessary.
Works Approval or Licence under EP Act	The project may require approval from DWER through a works approval/licence application under Part V of the EP Act if a concrete batching plant is required for construction. This will be obtained by the contractor prior to delivery as required.
Groundwater or surface water licence under the Rights in Water and Irrigation Act 1914	Horizon Power is permitted to access water under Section 42 and 49 of the *Electricity Operator (Powers) Act 1979*. Any licences required for construction water will be acquired by the construction contractor.
Notice of Intent to Clear system under the Soil and Land Conservation Act 1945	Not Applicable.
State and municipal heritage	A search of the Heritage Council WA inherit database confirms no State or municipal Heritage sites occur within the DE (DPLH, 2026).
Native title	The Proposed Action is not located within a Native Title Determination Area (Landgate, 2026).
Aboriginal Sites of Significance under the Aboriginal Heritage Act 1972	A search of the Aboriginal Cultural Heritage Inquiry System (ACHIS) shows that there are no publicly known boundaries of Registered sites that intersect the DE. The potential risk to Aboriginal cultural heritage within the DE is considered low, given the results of the desktop assessment and review of historical land use.

9 References

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Attachment A: Construction Environment Management Plan