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Shire of Narrogin

Submission to the Western Australian Planning Commission

Draft Renewable Energy Planning Code and Guidelines

April 2026

Submitted to: Western Australian Planning Commission

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Executive Summary

The Shire of Narrogin supports the transition toward renewable energy and recognises the important role renewable energy infrastructure will play in supporting Western Australia's future energy system. However, large-scale renewable energy developments represent one of the most significant land use changes affecting rural Western Australia. These developments have the potential to significantly impact agricultural landscapes, rural communities and local infrastructure.

Key recommendations from the Shire include:

- Recognition and continued validity of existing Local Planning Policies adopted by Local Governments.
- Minimum setbacks of three times turbine height from any non-participating property boundary.
- Minimum separation distances of at least 10 times the height of the turbine measured from the base to the tip of the blade at its highest point from noise sensitive premises including dwellings.
- Protection of non-host landowner rights and assurance that Local Governments will not face legal liability when assessing dwelling applications near wind farms.
- Mandatory Social Impact Assessments and meaningful Community Benefit Agreements.
- Mandatory Construction Resource and Materials Management Plans addressing gravel, sand and raw material extraction.
- Mandatory Water Resource Management Plans addressing water extraction quantities and impacts.
- There appears to be a clear error on page 16 of their draft code where it references the setbacks from approved habitable buildings on host lots and non-host lots of blade tip height x 1.1, clearly in contradiction to the minimum set back from habitable buildings of 1.5km currently in the guidelines.

1. Introduction

The Shire of Narrogin welcomes the opportunity to provide a submission regarding the Draft Renewable Energy Planning Code and Guidelines. Renewable energy investment presents economic opportunities for regional communities; however, it also introduces significant land use change.

The Wheatbelt region is experiencing increasing interest from renewable energy developers due to favourable wind resources and proximity to transmission infrastructure. It is therefore essential that the Renewable Energy Planning Code establishes a planning framework that protects rural communities, agricultural productivity and landowner rights while enabling responsible renewable energy development.

Council's specific resolution was:

That Council, with respect to Draft Renewable Energy Planning Code – Council Submission and Advocacy Position:

- 1) Endorses the attached submission (as amended) to the Western Australian Planning Commission regarding the Draft Renewable Energy Planning Code.
- 2) Advocates for minimum setbacks of three times turbine height from any non-participating property boundary including road reserves.
- 3) Advocates for minimum separation distances of at least 10 times the height of the turbine measured from the base to the tip of the blade at its highest point from noise sensitive premises including dwellings.
- 4) Advocates for mandatory Social Impact Assessments and Community Benefit Agreements for renewable energy developments.
- 5) Advocates for the inclusion of a Construction Resource and Materials Management Plan requirement under WF Element 11 – Construction.
- 6) Advocates for the inclusion of a Water Resource Management Plan requirement under WF Element 6 – Natural Environment.
- 6a) Advocates to the Department that there appears to be a clear error on page 16 of their draft code where it references the setbacks from approved habitable buildings on host lots and non-host lots in that it references a setback of blade tip height x 1.1 clearly in contradiction to the minimum set back from habitable buildings of 1.5km currently in the guidelines.
- 7) Requests clarification from the Western Australian Planning Commission regarding the legal status of existing Local Planning Policies following the introduction of the Renewable Energy Planning Code.
- 8) Requests assurance that local governments will not be exposed to legal liability and/or be indemnified by the State, relating to development approvals for dwellings on non-host lots near wind farms.
- 9) Provides the submission to the Western Australian Planning Commission and WALGA.

10) Publishes the submission on the Shire's website and communication channels to ensure community awareness.

2. Recognition of Local Planning Policies

The Shire of Narrogin has adopted Local Planning Policies addressing renewable energy development and associated impacts. These policies were adopted under the Planning and Development (Local Planning Schemes) Regulations 2015 and reflect local consultation and planning analysis.

Relevant policies include:

- Local Planning Policy – Wind Farms / Turbines
- Local Planning Policy – Social Impact Assessment
- Local Planning Policy – Temporary / Transient Workforce Accommodation

The Shire seeks confirmation that these policies remain valid and must be given due regard during development assessment once the Renewable Energy Planning Code is adopted.

3. Setback Distances and Land Use Compatibility

The Shire supports minimum setbacks of three times turbine height from any non-participating property boundary. This approach reflects a precautionary planning principle designed to minimise land use conflict.

The Shire also recommends a minimum separation distance of at least 10 times the height of the turbine measured from the base to the tip of the blade at its highest point from noise sensitive premises including dwellings.

4. Protection of Non-Host Landowner Rights

The Shire is concerned that proposed provisions relating to new dwellings near wind farms may unintentionally restrict the ability of non-host landowners to construct a dwelling on their own land.

The Shire seeks assurance that:

- Local Governments will not face legal liability when refusing dwelling applications due to wind farm proximity.
- Noise attenuation requirements will not expose Local Governments to legal claims.
- Non-host landowners will not have their development rights unreasonably restricted.

5. Social Impact Assessment Requirements

Large renewable energy developments can have significant social impacts including housing pressure, infrastructure demand and community change. The Shire recommends mandatory Social Impact Assessments for major renewable energy developments.

6. Community Benefit Mechanisms

The Shire considers it important that host communities receive meaningful benefits from renewable energy developments. Community benefit mechanisms may include community enhancement funds, infrastructure investment and community programs.

7. Construction Resource and Materials Management

Renewable energy developments require substantial quantities of gravel, sand and other construction materials. The Shire recommends that proponents submit a Construction Resource and Materials Management Plan identifying predicted quantities, extraction locations, transport routes and Traffic Management Plans.

8. Water Resource Management

Construction of renewable energy infrastructure requires significant water for dust suppression, road construction and turbine foundation works. The Shire recommends a Water Resource Management Plan be required addressing water quantities, sources and impacts on local water resources.

9. Conclusion

The Shire of Narrogin supports renewable energy development where it occurs in a manner that protects rural communities, agricultural productivity and local infrastructure. The Renewable Energy Planning Code provides an opportunity to establish a balanced planning framework that enables renewable energy while safeguarding regional communities.

Attachment:

This submission should be read in conjunction with the complete copy of the Council Report endorsed at the Council Meeting of 25 March 2026