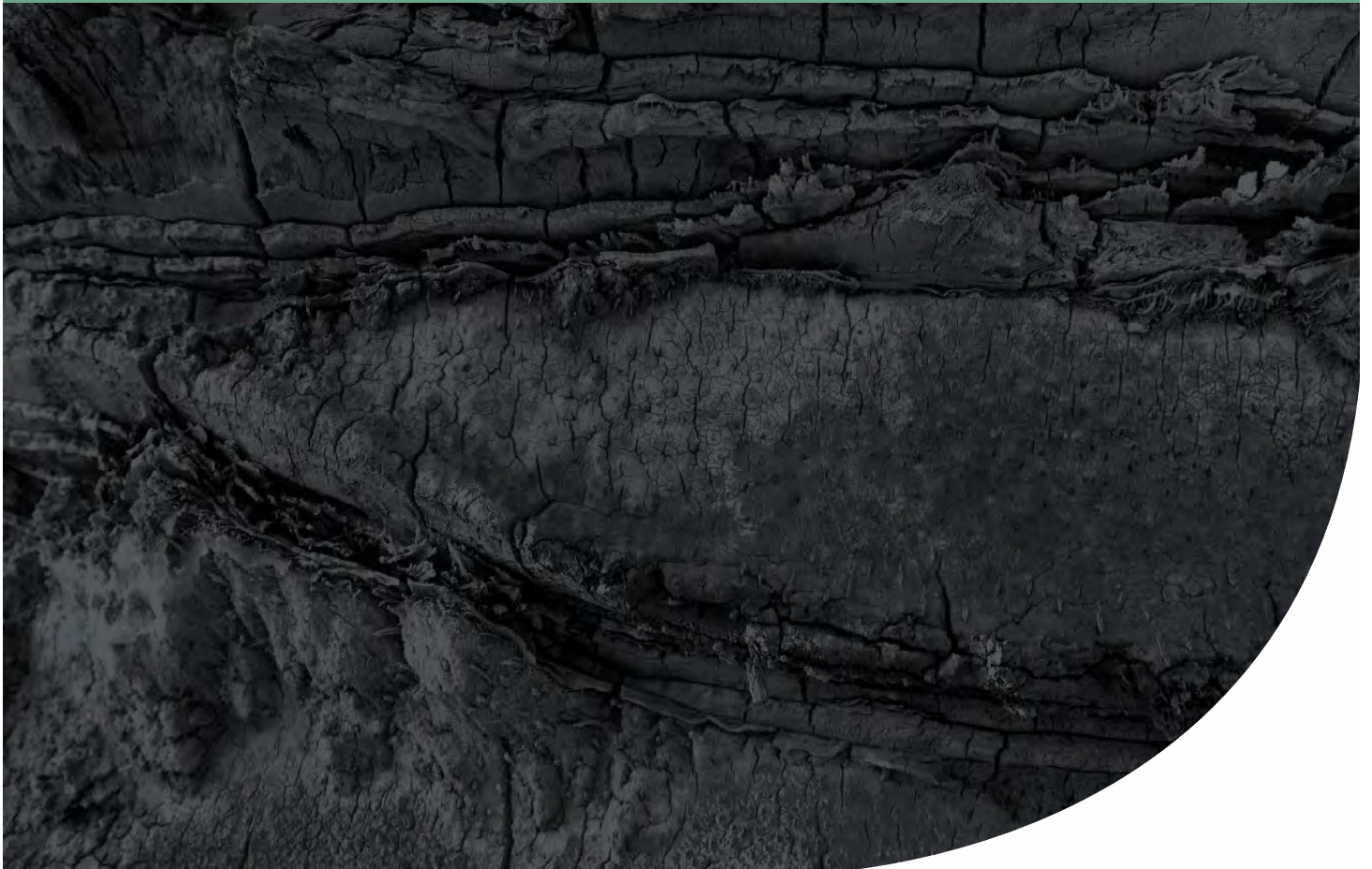


Bushfire Management Plan

Regans Ford BESS Facility

Project No: EP24-016(08)

**Prepared for Shizen Australia Pty Ltd
June 2026**



Bushfire Management Plan

Regans Ford BESS Facility



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This document has been prepared primarily to consider the layout of development and/or the appropriate building construction standards applicable to development, where relevant. The measures outlined are considered to be prudent minimum standards only based on the standards prescribed by the relevant authorities. The level of bushfire risk mitigation achieved will depend upon the actions of the landowner or occupiers of the land and is not the responsibility of the author. The relevant local government and fire authority (i.e. Department of Fire and Emergency Services or local bushfire brigade) should be approached for guidance on preparing for and responding to a bushfire.

Notwithstanding the precautions recommended in this document, it should always be remembered that bushfires burn under a wide range of conditions which can be unpredictable. An element of risk, no matter how small, will always remain. The objective of the Australian Standard AS 3959:2018 is to “prescribe particular construction details for buildings to reduce the risk of ignition from a bushfire” (Standards Australia 2018). Building to the standards outlined in AS 3959 does not guarantee a building will survive a bushfire or that lives will not be threatened by the effects of bushfire attack.

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Executive Summary

Shizen Australia Pty Ltd (the proponent) is proposing to develop a utility-scale 300 MW Battery Energy Storage System (BESS) facility (herein referred to as 'the proposal') in Regans Ford, within the Shire of Gingin, Western Australia (WA). The proposal is located within a 19.5 hectare (ha) portion of an existing olive plantation at Lot 1001 (No. 237) Orange Springs Road, herein referred to as the 'site'. The site is bound by Orange Springs Road and rural land to the north, Brand Highway reserve and rural landholdings to the east, the balance of the existing olive plantation to the west, and an under-construction Western Power electrical substation and remnant vegetation to the south.

For the purpose of the Bushfire Management Plan (BMP), the assessment has been focused on the portion of the broader lot where the BESS infrastructure and associated habitable buildings are proposed.

The entirety of the site is located within 'Area 2' (designated bushfire prone) on the state-wide Map of Bush Fire Prone Areas prepared by the Office of Bushfire Risk Management (OBRM 2025). Given the presence of designated bushfire prone areas within and adjacent to the site, an assessment against State Planning Policy 3.7 Bushfire (SPP 3.7) (WAPC 2024) is required to support the development application for the proposal.

Based on the above, this BMP has been prepared to incorporate further assessment of the bushfire risk in accordance with *Australian Standard 3959:2018 Construction of buildings in bushfire prone areas* (AS 3959), and the required risk treatments through compliance of the proposal with the policy measures described in the *Planning for Bushfire Guidelines - For the implementation of State Planning Policy 3.7 Bushfire* (the Guidelines) (WAPC 2024).

The policy intent for SPP 3.7 is:

"to implement effective, risk-based land use planning and development which in the first instance avoids the bushfire risk, but where unavoidable, manages and/or mitigates the risk to people, property and infrastructure to an acceptable level. The preservation of life and the management of bushfire impact are paramount."

The proposal is in accordance with the existing zoning for the site, with the proposal to be assessed by the outcomes applicable to 'Bushfire Protection Criteria 7 Development Commercial and Industrial' in the Guidelines.

This BMP has followed the Department of Planning Lands and Heritage (DPLH) *Bushfire Management Plan Manual November 2024 - Bushfire Management Plan Development Applications*. Accordingly, it provides a Bushfire Attack Level (BAL) assessment involving the classification of vegetation and effective slope in accordance with AS 3959, extending 150 m from the site in accordance with the Guidelines.

The following bushfire hazards were identified as applicable to the site based on existing conditions:

- **Forest (Class A) vegetation:** Forest vegetation has been identified external to the site to the southeast and east, primarily within the Brand Highway reserve and retained vegetation within the broader lot.

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- **Scrub (Class D) vegetation:** Scrub vegetation has been identified external to the site to the east and south, within the Brand Highway reserve and adjacent remnant bushland.
- **Grassland (Class G) vegetation:** Grassland vegetation has been identified external to the site to the south, within adjacent remnant bushland.

As part of assessing the long-term bushfire risk to the site, consideration is given to changes in vegetation classifications that will occur as a result of the proposed development. A key change is that the majority of the site will be maintained as non-vegetated hardstand (exclusion 2.2.3.2(e)) to accommodate the BESS infrastructure, while the balance of the site will continue to be actively managed for horticultural purposes (the retained olive plantation), achieving a low-threat state (exclusion 2.2.3.2(b) and (f)). No mature native trees are proposed to be removed to facilitate the development. Conditions within the site will be maintained by the proponent/occupiers to achieve these standards in perpetuity.

Compliance Assessment

The bushfire protection criteria (BPC) provided in the Guidelines represent the risk treatment acceptable solutions applicable to achieving the intent and outcomes listed in SPP 3.7. The BPC are divided into five criteria with each having four elements aligning to an outcome. In this instance, the relevant criteria (category) is *Criteria 7: Development – Commercial and Industrial* (BPC 7). Compliance with each element (as a risk treatment) is required to demonstrate to the decision maker that the risk is within an acceptable level, either by compliance with the acceptable solution or by an outcome (alternate solution).

This BMP demonstrates that compliance with the acceptable solution at each element in BCP 7 can be achieved and is summarised below:

- **Element 1 Location:** Element 1 is not applicable at the development application stage under BPC 7. Notwithstanding this, a simplified assessment of the broader locality has been included, identifying the proximity of the proposal to similar scale projects such as the Western Power substation to the south, the legibility of the existing public road network (Brand Highway and Orange Springs Road), and the proximity of the site to surrounding managed agricultural/horticultural land uses that result in large areas of lower bushfire hazard.
- **Element 2: Siting and Design:** The site will be developed and maintained to achieve a non-vegetated or low-threat classification across the BESS footprint and surrounding olive plantation buffers. The siting of the proposal has taken into consideration the retention of existing patches of vegetation (specifically avoiding a 0.09 ha patch of native vegetation in the road reserve). The site will continue to be managed to maintain a low-threat state, primarily through ongoing horticultural activities (slashing and active irrigation). The applicable BAL ratings to key components include:
 - **Habitable buildings (indicative office/packing area):** Strategically located to achieve a maximum rating of BAL-12.5.
 - **Battery storage units (BESS):** Positioned to achieve BAL-12.5 or less, isolated by non-combustible hardstand in accordance with CFA guidelines.
 - **Storage facility:** Sited in an area subject to a maximum of BAL-29, with the majority of the footprint subject to BAL-19 or BAL-12.5.

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- **Element 3: Vehicular Access:** The internal private driveway network is designed to provide access to Orange Springs Road to the north, ensuring connectivity to the broader public road network. It also provides for an interconnected access arrangement that facilitates access throughout the site, including to the BESS facility. The internal driveway network has been designed to address the requirements of Table 10 of Appendix B.3, with a trafficable surface of 6 m provided throughout to allow for two-way traffic movements. Where applicable, turnaround areas have been incorporated, ensuring that they satisfy functional considerations and enhance accessibility and safety.
- **Element 4: Water Supply:** All development must have an adequate water supply available for bushfire defence. The proposed development will be serviced by dedicated water tanks (comprising 13 tanks sized to yield a collective on-site static reserve comfortably exceeding 288,000 L) for firefighting purposes significantly exceeds the requirements outlined in the applicable WA planning framework (SPP 3.7, Appendix B.4, Table 11), which requires a minimum of only 10,000 L. Reticulated water supply is not confirmed for the site and therefore is not relied upon for the purposes of this bushfire assessment.

The management/mitigation measures to be implemented through the proposed development of the site have been outlined as part of this BMP.

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Appendix A

Proposed Development Layout

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List of Abbreviations

Table A1: Abbreviations – General terms

General terms	
AHD	Australian Height Datum
AS	Australian Standard
APZ	Asset Protection Zone
BAL	Bushfire Attack Level
BESS	Battery energy storage system
BMP	Bushfire Management Plan
BPAD	Bushfire Planning and Design
ESA	Environmentally sensitive area
FDI	Fire Danger Index
FZ	Flame Zone
PV	Photovoltaic
TEC	Threatened ecological community

Table A2: Abbreviations – Organisations

Organisations	
DBCA	Department of Biodiversity, Conservation and Attractions
DWER	Department of Water and Environmental Regulation
DFES	Department of Fire and Emergency Services
DPLH	Department of Planning, Lands and Heritage
OBRM	Office of Bushfire Risk Management
WAPC	Western Australian Planning Commission

Table A3: Abbreviations – Legislation and policies

Legislation	
AS 3959	<i>Australian Standard 3959:2018 Construction of buildings in bushfire prone areas</i>
SPP 3.7	<i>State Planning Policy 3.7 Bushfire (WAPC 2024)</i>
Guidelines	<i>Planning for Bushfire Guidelines - For the implementation of State Planning Policy 3.7 Bushfire (WAPC 2024)</i>

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Table A4: Abbreviations – Planning and building terms

Planning and building terms	
LPS	Local Planning Scheme
NCC	National Construction Code

Table A4: Abbreviations – units of measurement

Units of measurement	
cm	centimetre
ha	hectare
m	metre
m ²	square metre
m AHD	m in relation to the Australian height datum
mm	millimetre
km/h	kilometres per hour
L	Litres
MW	Megawatt
kV	Kilovolt

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1 Introduction

1.1 Background

Shizen Australia Pty Ltd (the proponent) is proposing to develop a utility-scale battery energy storage system (BESS) facility (herein referred to as 'the proposal') in Regans Ford, in the Shire of Gingin, Western Australia (WA). The proposal is located within a portion of an existing olive plantation at lot 1001 (No. 237) Orange Springs Road. The proposal is shown in **Appendix A**.

The proposal is located within a 19.5 hectare (ha) portion of the lot, herein referred to as the 'site', as shown in **Figure 1**. For the purpose of this Bushfire Management Plan (BMP), the assessment has been focused on the portion of the broader lot 1001 where the BESS infrastructure and associated habitable buildings are proposed. The site is bound by Orange Springs Road and rural land to the north, and Brand Highway reserve and rural landholdings to the east. To the south, an existing and larger under-construction Western Power substation is present along with an area of remnant vegetation, while to the west is the existing olive plantation.

The entirety of the site is located within 'Area 2' (designated bushfire prone) on the state-wide *Map of Bush Fire Prone Areas* prepared by the Office of Bushfire Risk Management (OBRM 2025) and shown in **Plate 1**. Given the presence of designated bushfire prone areas within and adjacent to the site, an assessment against *State Planning Policy 3.7 Bushfire* (SPP 3.7) (WAPC 2024) is required to support the development application for the proposal. Based on the above, this BMP has been prepared to incorporate further assessment of the bushfire risk in accordance with *Australian Standard 3959:2018 Construction of buildings in bushfire prone areas* (AS 3959), and the required risk treatments through compliance of the proposal with the policy measures described in the *Planning for Bushfire Guidelines - For the implementation of State Planning Policy 3.7 Bushfire* (the Guidelines) (WAPC 2024).

Furthermore, due to the unique nature of the proposal, additional consideration is required during the assessment process to alleviate design concerns, particularly as the Western Australian bushfire planning framework does not explicitly address the intricacies of a BESS facility. On this basis, the Country Fire Authority (CFA) *Design Guidelines and Model Requirements: Renewable Energy Facilities* (CFA 2023) have also been consulted, as this document is considered an example of best practice within the renewable energy industry and explicitly addresses bushfire management for BESS facilities.

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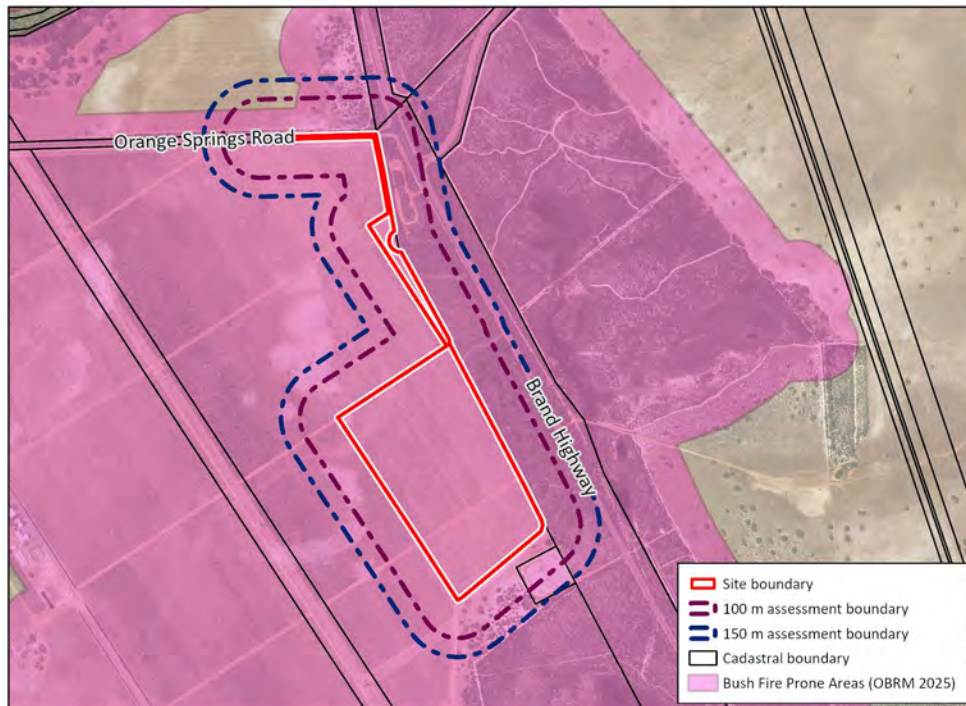


Plate 1: Areas within and nearby the site identified as 'bushfire prone areas' (as indicated in purple) under the state-wide Map of Bush Fire Prone Areas (OBRM 2025).

1.2 Aim of this report

The purpose of this BMP is to assess bushfire hazards both within the site, and nearby, and demonstrate that the threat posed by any identified hazards have been appropriately mitigated and managed. This BMP has been prepared in accordance with SPP 3.7 (WAPC 2024), the Guidelines (WAPC 2024) and AS 3959 (Standards Australia 2018), and the CFA Design Guidelines and Model Requirements: Renewable Energy Facilities (CFA 2023).

The document includes:

- An assessment of the existing classified vegetation in the vicinity of the site (within 150 m) and consideration of bushfire hazards that will exist in the post-development scenario (**Section 3**).
- Commentary on how the future development can achieve *Bushfire Protection Criteria 7: Development – Commercial and Industrial* (BPC 7) outlined within the Guidelines including an indication of BAL ratings likely to be applicable to future habitable buildings (**Section 5**).
- An outline of the roles and responsibilities associated with implementing this BMP (see **Section 6**).

1.3 Statutory policy and framework

The following key legislation, policies and guidelines have been applied to the preparation of this bushfire management plan:

- *Bush Fires Act 1954*
- *Fire and Emergency Services Act 1998*

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- *Planning and Development Act 2005* and associated regulations
- *Building Act 2011* and associated regulations
- *State Planning Policy 3.7 Bushfire (WAPC 2024)*
- *Planning for Bushfire Guidelines – For the implementation of State Planning Policy 3.7 Bushfire (WAPC 2024)*
- *Australian Standard AS 3959 – 2018 Construction of buildings in bushfire prone areas* (Standards Australia 2018)
- Design Guidelines and Model Requirements: Renewable Energy Facilities (CFA 2023)

1.4 Description of the proposed development

The site is proposed to be developed for commercial energy production and storage purposes, in line with the proposed development plan provided in **Appendix A**. The development associated with the proposal will include:

- A 300 MW / 2243.5 MWh Battery Energy Storage System (BESS) facility comprising battery units and MVPS units.
- A collector substation comprising MVA transformers (and associated feeders) and a connection point to the adjacent Western Power switchyard.
- Internal access tracks connecting into Orange Springs Road.
- A storage facility, alongside tentative locations for a site office (habitable building) and laydown areas. Drainage infrastructure.
- Thirteen (13) 20,000 L water tanks located throughout the BESS facility footprint to provide a dedicated water supply for firefighting purposes.

The site is zoned 'General Rural' under the Shire of Gingin Local Planning Scheme No. 9 (LPS No. 9) as shown in **Plate 2** below. No R-codes, restricted uses or additional uses apply to the area. In accordance with LPS No.9, the construction of a renewable energy facility on land zoned 'General Rural' is allowed where the local government has exercised its discretion by granting development approval after advertising the application in accordance with clause 64 of the deemed provisions.

Areas surrounding the site are also largely zoned 'General Rural'. An existing Western Power substation is situated directly to the east of the site, with the remainder of the immediate surrounds comprising agricultural landholdings and the balance of the existing olive plantation.

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Plate 2: Local Planning Scheme No. 9 (Shire of Gingin) zoning, in and surrounding the site.

1.5 Description of land characteristics

A review of historical images indicates that the site and its immediate surrounds were predominantly cleared of native vegetation by 1962-1963. From 2000 to the present, the site has been actively cultivated as an olive plantation. (WALIA 2024). The earliest publicly available aerial imagery shows that the surrounding areas have also supported agricultural land uses over the same time period. Areas of native vegetation are largely restricted to road reserves, adjacent rural lots, and larger conservation estates in the wider locality.

Surrounding land uses include:

- An existing and larger under-construction Western Power substation located immediately to the south of the site, forming part of the South West Interconnected System (SWIS).
- The balance of the existing olive plantation located immediately to the west of the site.
- Agricultural activities (including grazing, horticulture and cropping), large rural residential holdings, areas of remnant native vegetation, and limited rural-based commercial uses within the broader 'General Rural' locality.
- The Regans Ford Holiday Park, which is the nearest sensitive receptor, located approximately 700 m to the north.
- Moore River National Park located approximately 2.7 km to the south of the site.

Elevation across the site ranges between approximately 82 m and 86 m Australian Height Datum (AHD). The site is located on gently undulating terrain that is relatively uniform and lacks steep slopes (Landgate 2025) (see **Figure 2**).

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2 Environmental Considerations

In accordance with the *Bushfire Management Plan (BMP) Manual* (DPLH and WAPC 2024), this BMP has considered whether there are any environmental values that may require specific consideration through either protection, retention, or revegetation. It is based on the features relevant to the location of the site. To support this, a review of publicly available databases has been undertaken, with particular reference to the Shared Location Information Platform (SLIP) databases and site-specific investigations undertaken to support the development application. A summary of the search results has been provided in **Table 1**.

Table 1: Summary of potential environmental considerations that may be associated with the site (based on a search of the SLIP databases)

Key environmental feature (information in brackets refers to mapping data source)	Yes / no / potentially occurring within the site	If yes / potentially, describe value that may be impacted
Conservation category wetlands and buffer (Geomorphic Wetlands, Swan Coastal Plain (DBCA-019))	No	No mapped wetland features or watercourses occur within the site. The nearest conservation category wetland lies approximately 280 m east of the site, with the nearest resource enhancement wetland located 150 m to the east. Due to these separation distances, adequate buffers are readily achieved, and no direct or indirect impacts to hydrological or ecological wetland values are anticipated.
RAMSAR wetlands (DBCA-010)	No	No RAMSAR wetlands are identified within the mapping as occurring within the site or in close proximity.
Threatened and priority flora (DBCA-036)	No	Following a review of publicly available datasets and a site inspection by Emerge Associates (2026), it was confirmed that no threatened or priority flora species occur within the site. Vegetation across the site is predominantly completely degraded, comprising planted olive groves over non-native grasses and forbs. Given the high level of historical disturbance and ongoing agricultural land use, no threatened or priority flora species are likely to occur, and no impacts are anticipated.
Threatened and priority fauna (DBCA-037)	Yes	Following a review of publicly available datasets and a site inspection by Emerge Associates (2026), it was identified that one threatened fauna species, <i>Zanda latirostris</i> (Carnaby's black cockatoo), has the potential to occur within the site. The site contains approximately 0.01 ha of secondary native foraging habitat (<i>Eucalyptus tottiana</i>). However, no mature native trees suitable for breeding or roosting were recorded. The balance of the site is expected to support habitat for common and widespread fauna species. Given the highly modified nature of the existing olive plantation, significant impacts to conservation-significant fauna are not anticipated. It is noted that any potential impacts to these habitat areas will occur as a requirement of the general implementation of the proposal, and not as a direct consequence of implementing the bushfire risk treatments outlined within this BMP.

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Table 1: Summary of potential environmental considerations that may be associated with the site (based on a search of the SLIP databases) (continued).

Key environmental feature (information in brackets refers to mapping data source)	Yes / no / potentially occurring within the site	If yes / potentially, describe value that may be impacted
Threatened ecological communities (DBCA-038)	No	Following a review of publicly available datasets and a site inspection by Emerge Associates (2026), it was identified that no threatened or priority ecological communities (TECs or PECs) occur within the site. While the small patch of native vegetation mapped within the Orange Springs Road reserve (Unit JA) was likely once contiguous with a Banksia Woodland TEC to the east, historical disturbance has removed the mature overstorey. The resulting regrowth lacks the necessary structural and species characteristics to meet the diagnostic criteria for this TEC. Given the extent of clearing, vegetation modification, and the degraded condition of the site, no TECs or PECs are considered likely to occur.
Department of Biodiversity Conservation and Attractions (DBCA) controlled lands or waters (DBCA-011)	No	Following a review of publicly available datasets, it has been determined that no DBCA-controlled lands or waters exist within the site.
Clearing regulations – environmentally sensitive areas (DWER-046)	No	No environmentally sensitive areas (ESAs) are identified within the site. The nearest mapped ESA is located approximately 220 m to the east of the site, associated with a conservation category wetland. Given this separation distance, clearing and development within the site are not expected to directly or indirectly impact ESA values.

2.1 Native vegetation – modification and clearing

As outlined above, the site has historically been cleared to allow for agricultural land uses and now primarily accommodates an active olive plantation (predominantly planted olive trees over non-native grasses and forbs). The site is primarily utilised for horticultural purposes and is already largely disturbed and cleared, comprising 12.58 ha of completely degraded non-native vegetation. A minor 0.09 ha patch of degraded native vegetation (Unit JA) is located within the Orange Springs Road reserve.

The proponent aims to utilise existing cleared areas for site access and infrastructure layout wherever possible, specifically seeking to avoid the clearing of the 0.09 ha native vegetation patch (Unit JA). No mature native trees are present within the site that would require removal to enable the construction of the key infrastructure components of the proposal. No vegetation external to the site will be removed to reduce bushfire risk.

Regarding bushfire management, no additional vegetation clearing is required beyond what is necessary for construction purposes. The existing olive plantation is maintained to a low-threat standard in accordance with Clause 2.2.3.2 of AS 3959 and does not contribute to the bushfire hazard. For the purpose of this BMP, it is assumed that only non-native vegetation (planted olive trees) within the BESS facility footprint will be removed.

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Where clearing/modification of vegetation is required, this will need to be undertaken with a valid clearing permit or through exemptions pursuant to the *Environmental Protection Act 1986* or the *Environmental Protection (Clearing of Native Vegetation) Regulations 2004*. Such exemptions include clearing associated with the construction of a building (or other structure), vehicle cross-over or in compliance with a requirement under Section 33 of the *Bush Fires Act 1954*.

2.2 Revegetation and landscape plans

No revegetation is proposed as part of the development.

The proposal will largely replace a portion of the existing planted olive grove with BESS infrastructure. The development footprint will include a mix of hardstand areas, compacted earth, and localised areas of managed grass. These areas will be designed and managed to achieve low-threat exemptions in accordance with Clause 2.2.3.2 of AS 3959. Specifically, to align with the CFA (2023) guidelines, battery units will be isolated by a minimum 10 m separation distance of non-combustible, low-threat land (e.g., paved or compacted earth) to prevent fire escalation. Other ongoing management is likely to include:

- Irrigation of grass and garden beds (where required).
- Regular removal of weeds and built-up dead material (such as fallen branches, leaf litter, etc.).
- Low pruning of trees (branches below 2 m in height removed where appropriate).
- Application of ground/surface covers such as mulch or non-flammable materials as required.
- Regular mowing/slashing (or grazing) of grass to less than 100 mm in height.

The proponent (or future occupiers) will be responsible for the ongoing maintenance of these areas within the site.

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3 Bushfire Assessment Results

Bushfire risk for the site has been appropriately considered with regard to the potential impact upon the site using AS 3959 and the Guidelines. The objective of AS 3959 is to reduce the risk of ignition and loss of a building to bushfire. It provides a consistent method for determining a radiant heat level (radiant heat flux) as a primary consideration of bushfire attack. AS 3959 measures the bushfire attack level (BAL) as the radiant heat level (kW/m^2) over a distance of 100 m. AS 3959 also prescribes deemed-to-satisfy construction responses that can resist the determined radiant heat level at a given distance from the fire. It is based on six BAL ratings: BAL-LOW, BAL-12.5, BAL-19, BAL-29, BAL-40 and BAL-FZ.

A BAL contour plan has been prepared in accordance with Appendix A.3 of the Guidelines and Method 1 of AS 3959 to determine the BAL ratings likely to be applicable to future buildings. This has been based on the vegetation classifications and the effective slope under the vegetation (post-development scenario).

3.1 Assessment inputs

Vegetation classifications, reflective of the existing conditions, and effective slope have been detailed in **Table 2** and **Figure 2** (post-development). A site assessment was completed on 5 February 2026.

3.1.1 Assumptions

The BAL assessment is based on the following assumptions:

- **Designated FDI:** 80
- **Flame temperature:** 1090 K
- **Effective slope beneath classified vegetation:** flat/upslope (**Figure 2**)
- The development footprint within the site, associated with the BESS facility and collector substation, will be developed and maintained to remain non-vegetated or achieve a low-threat classification (in accordance with Clauses 2.2.3.2 (e) and (f) of AS 3959).
- The balance of the site, comprising the existing olive plantation, is actively managed for horticultural purposes and currently achieves a low-threat standard. It is assumed this area will continue to be managed in this state (in accordance with Clause 2.2.3.2 of AS 3959).
- Areas of non-vegetated or low threat vegetation outside the site will continue to be managed and/or considered to achieve low threat (in accordance with Section 2.2.3.2 of AS 3959) based on the existing maintenance regimes.
- Classified vegetation that has been identified outside of the proponent's landholdings has been assumed to remain in its current state (unless stated otherwise) and will therefore continue to be a bushfire hazard to development within the site.
- Areas of grassland can include up to 10% foliage cover from shrubs and trees, as per AS 3959

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3.1.2 Vegetation classification

All vegetation within 150 m of the site was classified in accordance with Section 2.2.3 of AS 3959. The assignment of vegetation classifications is based on an assessment of vegetation structure, including consideration of the various fuel layers of different vegetation types, as outlined in **Plate 3**. Each distinguishable vegetation plot is described in **Table 2** and shown in **Figure 2**.

Not all vegetation is classified as a bushfire risk. Vegetation and ground surfaces that are exempt from classification as a potential hazard are identified as a low threat under Section 2.2.3.2 of AS 3959. Low threat vegetation includes the following:

- Vegetation of any type that is more than 100 m from the site.*
- Single areas of vegetation less than 1 ha in area and not within 100 m of other areas of vegetation being classified.*
- Multiple areas of vegetation less than 0.25 ha in area and not within 20 m of the site, or each other or of other areas of vegetation being classified.*
- Strips of vegetation less than 20 m in width (measured perpendicular to the elevation exposed to the strip of vegetation) regardless of length and not within 20 m of the site or each other, or other areas of vegetation being classified.*
- Non-vegetated areas, that is, areas permanently cleared of vegetation, including waterways, exposed beaches, roads, footpaths, buildings, and rocky outcrops.*
- Vegetation regarded as low threat due to factors such as flammability, moisture content or fuel load. This includes grassland managed in a minimal fuel condition, mangroves, and other saline wetlands, maintained lawns, golf courses (such as playing areas and fairways), maintained public reserves and parklands, sporting fields, vineyards, orchards, banana plantations, market gardens (and other non-curing crops), cultivated gardens, commercial nurseries, nature strips and wind breaks.*



Plate 3: The five fuel layers in a forest environment that could be associated with fire behaviour (Gould, McCaw et al. 2007)

Bushfire Management Plan

Regans Ford BESS Facility

Table 2: AS 3959 vegetation classification (refer to **Figure 2**)

Photo ID:	1	Plot:	1
Vegetation Classification or Exclusion Clause and Effective Slope			
Forest (Class A) – Flat/upslope			
Description / Justification for Classification			
Forest vegetation located to the southeast of the site within the Brand Highway reserve and retained vegetation internal to the broader Lot 1001. This vegetation comprises trees typically >10 m in height with a canopy cover of 30-70% and a multi-tiered understorey. It is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	2	Plot:	1
Vegetation Classification or Exclusion Clause and Effective Slope			
Forest (Class A) – Flat/upslope			
Description / Justification for Classification			
Forest vegetation located to the east of the site within the Brand Highway reserve. This vegetation comprises an intact native overstorey ranging from 10-15 m in height with a multi-tiered understorey and a canopy cover of 30-70%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	3	Plot:	1
Vegetation Classification or Exclusion Clause and Effective Slope			
Forest (Class A) – Flat/upslope			
Description / Justification for Classification			
Forest vegetation located to the east of the site within the Brand Highway reserve. This vegetation comprises an intact native overstorey ranging from 10-15 m in height with a multi-tiered understorey and a canopy cover of 30-70%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			

West Elevation

☉ 108°E (T) • -31.009326, 115.71315 ±4m ▲ 50m



26-010
05 Feb 2026 11:43:21 am

South Elevation

☉ 2°N (T) • -31.008461, 115.713116 ±3m ▲ 45m



26-010
05 Feb 2026 11:46:31 am

South Elevation

☉ 13°N (T) • -31.007496, 115.712625 ±3m ▲ 52m



26-010
05 Feb 2026 11:53:48 am

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Table 2: AS 3959 vegetation classification (refer to **Figure 2**) (continued)

Photo ID:	4	Plot:	1
Vegetation Classification or Exclusion Clause and Effective Slope			
Forest (Class A) – Flat/upslope			
Description / Justification for Classification			
Forest vegetation located to the east of the site within the Brand Highway reserve. This vegetation comprises an intact native overstorey ranging from 10-15 m in height with a multi-tiered understorey and a canopy cover of 30-70%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	5	Plot:	2
Vegetation Classification or Exclusion Clause and Effective Slope			
Scrub (Class D) – Flat/upslope			
Description / Justification for Classification			
Scrub vegetation located to the east of the site within the Brand Highway reserve. This vegetation comprises a continuous canopy of shrubs ranging from 2-6 m in height, with a foliage cover greater than 30%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	6	Plot:	2
Vegetation Classification or Exclusion Clause and Effective Slope			
Scrub (Class D) – Flat/upslope			
Description / Justification for Classification			
Scrub vegetation located to the east of the site within the Brand Highway reserve. This vegetation comprises a continuous canopy of shrubs ranging from 2-6 m in height, with a foliage cover greater than 30%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			



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Table 2: AS 3959 vegetation classification (refer to **Figure 2**) (continued)

Photo ID:	7	Plot:	2
Vegetation Classification or Exclusion Clause and Effective Slope			
Scrub (Class D) – Flat/upslope			
Description / Justification for Classification			
Scrub vegetation located to the south of the site. This vegetation comprises a continuous canopy of shrubs greater than 1 m but less than 6 m in height, with a foliage cover greater than 30%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
			
Photo ID:	8	Plot:	2
Vegetation Classification or Exclusion Clause and Effective Slope			
Scrub (Class D) – Flat/upslope			
Description / Justification for Classification			
Scrub vegetation located to the southeast of the site within the Brand Highway reserve. This vegetation comprises a continuous canopy of shrubs ranging from 2-6 m in height, with a foliage cover greater than 30%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
			
Photo ID:	9	Plot:	2
Vegetation Classification or Exclusion Clause and Effective Slope			
Scrub (Class D) – Flat/upslope			
Description / Justification for Classification			
Scrub vegetation located to the northeast of the site within the Brand Highway reserve. This vegetation comprises a continuous canopy of shrubs ranging from 2-6 m in height, with a foliage cover greater than 30%. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
			

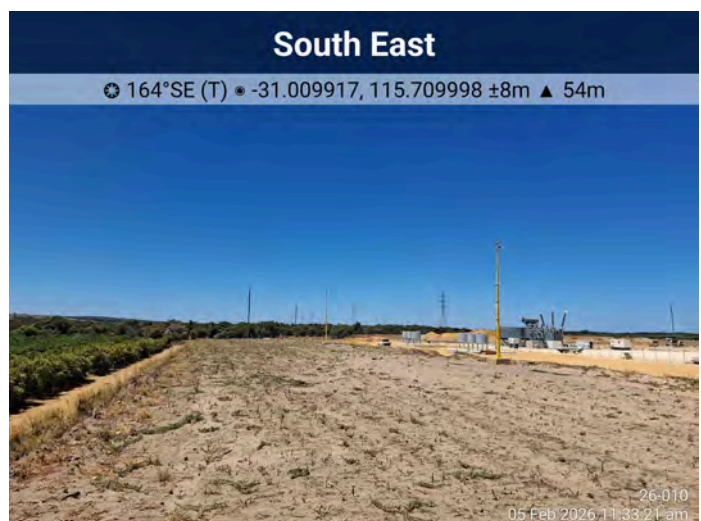
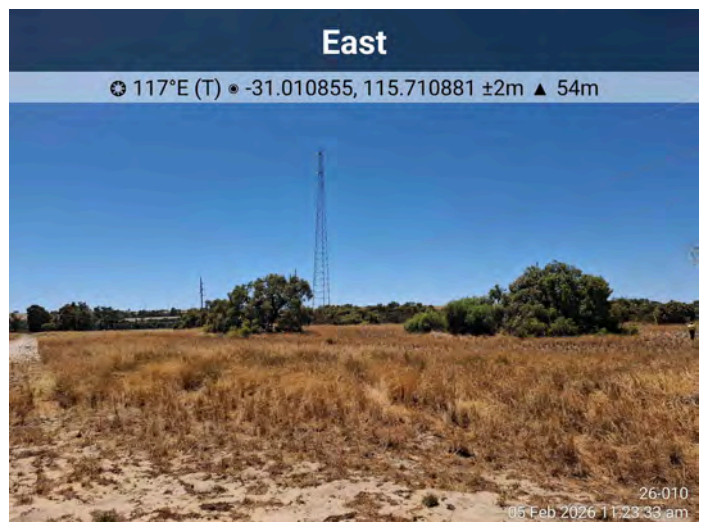
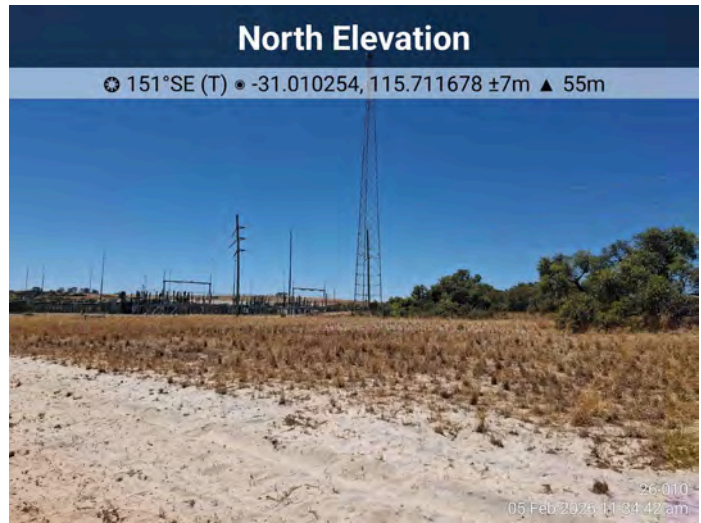
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Table 2: AS 3959 vegetation classification (refer to **Figure 2**) (continued)

Photo ID:	10	Plot:	3
Vegetation Classification or Exclusion Clause and Effective Slope			
Grassland (Class G) – Flat/upslope			
Description / Justification for Classification			
Grassland vegetation located to the south of the site. This vegetation comprises unmanaged grassy ground fuels greater than 100 mm in height. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	11	Plot:	3
Vegetation Classification or Exclusion Clause and Effective Slope			
Grassland (Class G) – Flat/upslope			
Description / Justification for Classification			
Grassland vegetation located to the south of the site. This vegetation comprises unmanaged grassy ground fuels greater than 100 mm in height. Being external to the site boundary, it is assumed this vegetation will be retained in its current state and will continue to present a bushfire hazard.			
Photo ID:	12	Plot:	4
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Non-vegetated (Clause 2.2.3.2 (e))			
Description / Justification for Classification			
Area located to the southwest of the site associated with the under-construction Western Power substation development. This area comprises non-vegetated surfaces. It is assumed that ongoing management of the area will continue to support facility operations, and therefore it does not present a bushfire hazard.			

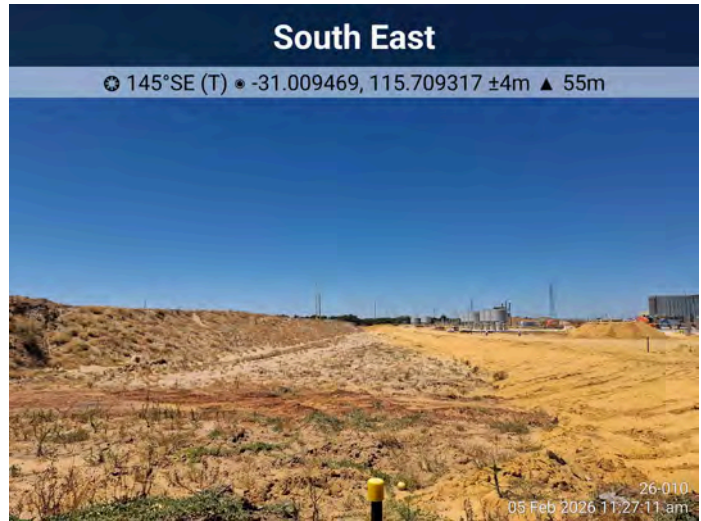


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Table 2: AS 3959 vegetation classification (refer to **Figure 2**) (continued)

Photo ID:	13	Plot:	4
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Non-vegetated (Clause 2.2.3.2 (e))			
Description / Justification for Classification			
Area located to the southwest of the site associated with the under-construction Western Power substation development. This area comprises non-vegetated surfaces. It is assumed that ongoing management of the area will continue to support facility operations, and therefore it does not present a bushfire hazard.			
Photo ID:	14	Plot:	4
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Non-vegetated (Clause 2.2.3.2 (e))			
Description / Justification for Classification			
The existing access track located on the eastern side of the site. This area consists of graded gravel and is entirely devoid of vegetation and therefore does not present a bushfire hazard.			
Photo ID:	15	Plot:	5
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Low threat (Clause 2.2.3.2 (f))			
Description / Justification for Classification			
The existing active olive plantation located to the west of the site. This area features a managed understorey consisting of slashed grasses, is actively irrigated for horticultural purposes, and is maintained in a low-threat state. Therefore, it can be excluded and does not present a bushfire hazard.			



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Table 2: AS 3959 vegetation classification (refer to **Figure 2**) (continued)

Photo ID:	16	Plot:	5
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Low threat (Clause 2.2.3.2 (f))			
Description / Justification for Classification			
The existing active olive plantation located to the west of the site. This area features a managed understorey consisting of slashed grasses, is actively irrigated for horticultural purposes, and is maintained in a low-threat state. Therefore, it can be excluded and does not present a bushfire hazard.			
Photo ID:	17	Plot:	4/5
Vegetation Classification or Exclusion Clause and Effective Slope			
Excluded - Low threat (Clause 2.2.3.2 (e & f))			
Description / Justification for Classification			
The existing access track located to the north of the BESS facility; alongside adjacent landscaping associated with the olive plantation. The track consists of strictly non-vegetated surfaces, while the adjacent landscaping is maintained in a low-threat state. Consequently, these areas can be excluded and do not present a bushfire hazard.			



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3.2 Assessment outputs

The vegetation classifications determined in **Section 3.1** are summarised in **Table 3** and shown in **Figure 2** and incorporate the known changes to vegetation post-development within the site and the determined effective slope.

Table 3: AS 3959 vegetation classification and effective slope applicable to the site

Plot	Applied vegetation classification	Effective slope
1	Class A – Forest	Flat/upslope
2	Class D – Scrub	Flat/upslope
3	Class G – Grassland	Flat/upslope
4	Exclusion 2.2.3.2(e)	Not applicable
5	Exclusion 2.2.3.2(f)	Not applicable

The resultant BAL rating contour map applicable to the site is provided in **Figure 3**. These BAL ratings are based on the minimum distances outlined in Table 2.5 of AS 3959 for the applicable vegetation classifications and effective slope, which have been summarised for ease of reference in **Table 4**.

A summary of the resulting BAL impacts on key elements of the proposal is provided below:

- **Battery storage units:** The BESS units will be positioned to achieve BAL-12.5 or below, with the majority of the units situated centrally within the footprint to achieve BAL-LOW. Furthermore, as outlined in **Section 2.2**, they will be surrounded by appropriate non-combustible separation buffers in accordance with CFA guidelines.
- **Building maintenance, control rooms and switchboard sheds (if classified as habitable buildings):** Designed to be located within the central or eastern portions of the proposed BESS facility footprint, ensuring they are situated entirely within an area subject to BAL-29 or lower (predominantly BAL-LOW).

The proposal has been designed to address the revegetation vegetation assumptions, ensuring that all key elements are appropriately sited to minimise bushfire risk.

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Table 4: Setback distances based on vegetation classification and effective slope and Table 2.5 of AS 3959, as determined by the method 1 BAL assessment.

Plot number (Figure 2)	Vegetation classification (see Figure 2)	Effective slope (see Figure 2)	Distance to vegetation (from Table 2.5 of AS 3959)	BAL rating (see Figure 3)
Plot 1	Forest (Class A)	Flat/upslope	< 16 m	BAL-FZ
			16 - < 21 m	BAL-40
			21 - < 31 m	BAL-29
			31 - < 42 m	BAL-19
			42 - < 100 m	BAL-12.5
			> 100 m	BAL-LOW
Plot 2	Scrub (Class D)	Flat/upslope	< 10 m	BAL-FZ
			10 - < 13 m	BAL-40
			13 - < 19 m	BAL-29
			19 - < 27 m	BAL-19
			27 - < 100 m	BAL-12.5
			> 100 m	BAL-LOW
Plot 3	Grassland (Class G)	Flat/upslope	< 6 m	BAL-FZ
			6 - < 8 m	BAL-40
			8 - < 12 m	BAL-29
			12 - < 17 m	BAL-19
			17 - < 50 m	BAL-12.5
			> 50 m	BAL-LOW

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4 Identification of Bushfire Hazard Issues

From a bushfire hazard management perspective, based on the requirements of SPP 3.7 and the Guidelines, the key issues that are likely to require management and/or consideration as part of development within the site, include:

- Provision of appropriate separation distance from bushfire hazards (such as the Class A Forest and Class D Scrub within the Brand Highway reserve) to ensure a BAL rating of BAL-29 or less can be achieved at future habitable buildings (such as control rooms or maintenance sheds).
- Ensuring that site access is designed, constructed and managed to enable safe access and egress for fire fighting vehicles and occupants.
- Ensuring that the understorey within the adjacent olive plantation and any localised grasses within the BESS footprint are managed to achieve low-threat and APZ standards to reduce the risk of fires starting onsite or being exacerbated by a large grass fuel load.
- Ensuring that the provision of water for firefighting is sufficient and accessible by firefighting services.

There are risks associated with a BESS facility, and knowledge of battery fires and the reasons why they should be isolated is a relevant consideration given battery fires can be difficult to extinguish however is not required to be specifically addressed in detail under SPP 3.7.

While Western Australia does not have any specific guidelines on renewable energy facilities, the *CFA Design Guidelines and Model Requirements: Renewable Energy Facilities* (CFA 2023) provides a useful guide and has been considered as part of this assessment.

The risk from bushfire associated with the proposal can be managed through the siting of the habitable components of development in an area subject to BAL-29 or less (outside of flame length), the isolation and separation of the battery units with a minimum 10 m separation from other assets within low threat land (paved or compacted earth), and through the provision of access for fire-fighting appliances and access to a dedicated static water supply (as reticulated scheme water is not relied on in this rural location). An example of the siting considerations has been included in **Plate 4**.

The facility is designed to prevent fire from leaving the BESS facility. In the event of a battery fire, the battery units will be allowed to burn out in a controlled manner. A dedicated static water supply will be available to prevent the fire from spreading to the surrounding vegetation (including the retained olive plantation). This water supply will be accessible to firefighting services to ensure they can effectively manage and contain any fire incidents. The design includes strategic placement of the water tank and hydrants/drafting points to ensure quick and easy access for firefighting vehicles. Regular maintenance and inspections will be conducted to ensure the water supply infrastructure remains operational and compliant with safety standards.

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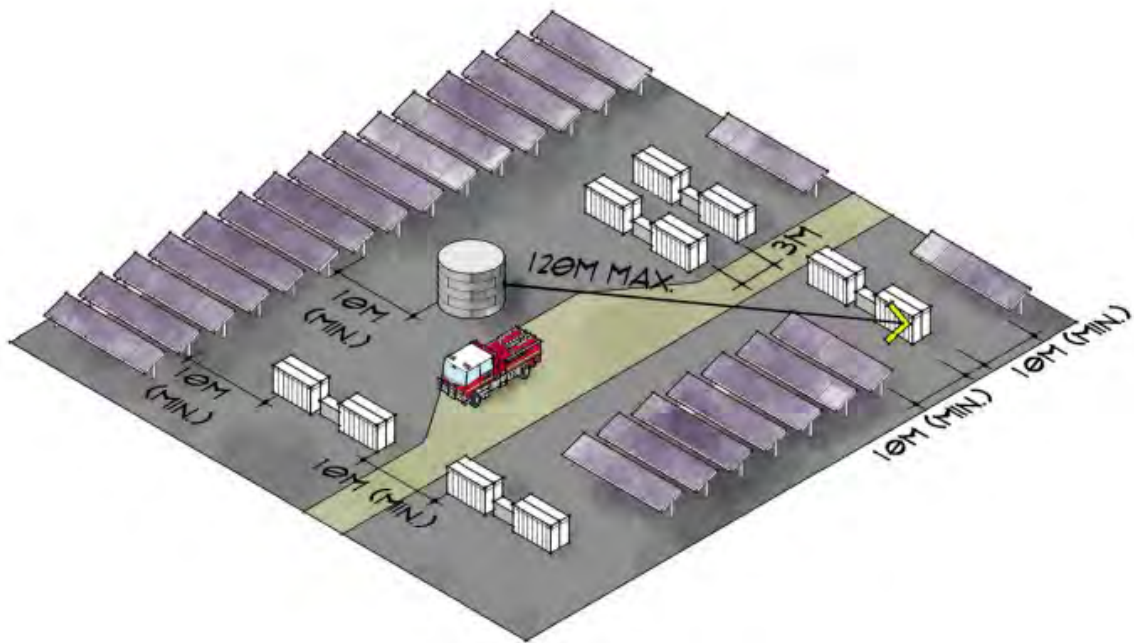


Plate 4: Excerpt from the CFA Design Guidelines and Model Requirements: Renewable Energy Facilities (CFA 2023) detailing potential siting considerations with water supply within 120 m of the battery storage area.

4.1 Permanent hazards

The site is located adjacent to areas of classified vegetation to the east, south, and southwest, which are associated with the Brand Highway road reserve and adjacent remnant bushland not under the control of the proponent. Consequently, these areas cannot be modified by the landholder and are assumed to remain in the long term.

The permanent classified vegetation most affecting development within the site includes:

- **Forest (Class A) vegetation:** Forest vegetation has been identified external to the site boundary to the southeast and east, primarily within the Brand Highway reserve and retained vegetation within the broader lot.
- **Scrub (Class D) vegetation:** Scrub vegetation has been identified external to the site boundary to the east and south, within the Brand Highway reserve and adjacent remnant bushland.
- **Grassland (Class G) vegetation:** Grassland vegetation has been identified external to the site boundary to the south, within adjacent remnant bushland.

As these hazards are located externally and outside the proponent's direct control, they are assumed to persist in their current state and present a permanent bushfire hazard to the site.

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4.2 Vulnerable land use

The definition of vulnerable land use as outlined in SPP 3.7 is a land use which *“is designed to accommodate people who are less physically or mentally able and likely to present evacuation challenges; and/or due to the building design or use, or the number of people accommodated, likely to present evacuation challenges; and or involves visitors who are unfamiliar with the surroundings”* (WAPC 2024). This generally includes (but is not limited to) schools, hospitals, aged care facilities and similar.

No vulnerable land uses are identified as part of the proposal.

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5 Assessment Against the Bushfire Protection Criteria

5.1 Bushfire protection criteria

The bushfire protection criteria provided in the Guidelines represent the risk treatments applicable to achieving the intent and the objectives listed in SPP 3.7. The bushfire protection criteria vary depending upon the stage of the planning process and development type and are divided into four subsystems (elements). Each subsystem is provided with an outcome, or an acceptable solution method (predetermined solution). Compliance with each subsystem (as a risk treatment) is required to demonstrate to the decision-maker that the risk is within acceptance.

The bushfire protection criteria identified in the Guidelines and addressed as part of this BMP are:

- Element 1: Location
- Element 2: Siting and design
- Element 3: Vehicular access
- Element 4: Water supply

Bushfire protection criteria 7 (BCP 7) for commercial and industrial development applications have been considered for the proposed development of the site. The assessment demonstrates that the proposal can achieve the objectives of SPP 3.7 and addresses BCP 7 through acceptable solutions detailed in the Guidelines, as summarised in **Table 5**.

Table 5: Assessment against the bushfire protection criteria from the Guidelines

Bushfire protection criteria	Proposed bushfire management strategies
Element 1: Location	
Not applicable	BPC 7 does not require assessment against Element 1: Location at the development application stage. However, to emphasise the suitability of the locality for the proposed BESS facility, a simplified assessment of the broader area has been included below and visualised in Figure 5. The legibility of the existing public road network in the area is a significant advantage. The key access route, Brand Highway (a primary State corridor), provides direct routes for access to the north and south, connecting to major regional centres and the Perth metropolitan area. Orange Springs Road also provides secondary local connectivity. This ensures that the site is well-connected and accessible, facilitating the transportation of materials, equipment, personnel, and emergency services. The robust road network supports the logistical needs of the development and enhances its operational viability. This has already been identified by other similar scale projects in the general locality, such as the Western Power substation located immediately to the south of the site. This proximity highlights the suitability for such developments and suggests potential synergies between projects, which can enhance operational efficiencies and infrastructure sharing. Additionally, the site is in an existing location dominated by agricultural land uses (including the active olive plantation), which results in managed fuel land adjacent to the majority of the site. This managed land provides a buffer that can help mitigate potential environmental impacts and reduce the risk of uncontrollable bushfires spreading to the facility. The location is suitable for the proposal.

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Table 5: Assessment against the bushfire protection criteria from the Guidelines (continued)

Bushfire protection criteria	Proposed bushfire management strategies
Element 2: Siting and design (Continued)	
A2.1a Siting and design	The proposal incorporates structures that may require access to internal spaces by workers as part of operational and maintenance activities, which could be classified as 'habitable buildings' (such as the indicative office/packing area). All habitable buildings will be strategically located within the proposed facility footprint, providing sufficient separation from post-development classified vegetation to ensure they are situated entirely within an area subject to a maximum of BAL-12.5. The BAL contour plan provided in Figure 3 demonstrates that the proposal's key components can achieve a compliant BAL rating based on the existing and post-development vegetation classifications. Additionally, the siting of these components has been carefully considered to minimise bushfire risk: • Battery storage units (BESS): Positioned to achieve BAL-12.5 or less. Furthermore, they are isolated by non-combustible hardstand in accordance with CFA guidelines. • Habitable buildings (indicative office/packing area): Located to achieve a maximum rating of BAL-12.5. • Storage facility: Sited in an area subject to a maximum of BAL-29, with the majority of the footprint subject to BAL-19 or BAL-12.5. The proposal complies with A2.1a.
A2.1b Siting in an area with a radiant heat impact exceeding 29 kW/m ² (BAL-40 or BAL-FZ)	All habitable buildings will achieve BAL-29 or below. The proposal complies with A2.1b.
A2.2 Asset Protection Zone (APZ)	The proposed development footprint and a significant portion of the broader lot will be developed and maintained to achieve a low-threat exclusion (specifically the retained olive plantation with its actively managed understory) or remain non-vegetated (the proposed BESS facility footprint, hardstand buffers, and associated access tracks) in accordance with Clauses 2.2.3.2 (e) and (f) of AS 3959. The areas within the site that will be subject to ongoing management to maintain low-threat or non-vegetated classifications are identified in Figure 5. The site is already largely managed to a low fuel state and is proposed to continue through ongoing horticultural activities (including active irrigation and the slashing of understory grasses within the olive plantation). This management and the extensive non-vegetated footprint ensures that habitable buildings (such as the indicative office/packing area) are not exposed to radiant heat levels exceeding BAL-12.5, and that the proposed battery units (considered hazardous, flammable, and/or combustible materials) will be subject to a maximum of BAL-12.5, with the majority of the footprint subject to BAL-LOW. The proposal complies with A2.2.
A2.3 Clearing of native vegetation	As outlined in Section 2.1, the site has historically been cleared for agricultural purposes and now predominantly accommodates an active olive plantation. Native vegetation is restricted to a minor 0.09 ha degraded patch (Unit JA) located within the Orange Springs Road reserve. The proponent aims to utilise the existing non-native cleared areas (the olive plantation) for site access and infrastructure layout. The proposal specifically seeks to avoid the clearing of the 0.09 ha native vegetation patch. Consequently, no mature native trees within the site will need to be removed to enable the construction of the proposal. No vegetation external to the site is proposed to be removed or modified for bushfire management purposes and will remain in its existing condition. (continued below)

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Table 5: Assessment against the bushfire protection criteria from the Guidelines (continued)

Bushfire protection criteria	Proposed bushfire management strategies
Element 2: Siting and design (Continued)	
A2.3 Clearing of native vegetation (continued)	Regarding bushfire management, no additional vegetation clearing is required beyond what is necessary for construction purposes. The balance of the site, comprising the retained olive plantation, is already maintained to a low-threat standard and does not require further modification for bushfire risk mitigation. For the purpose of this BMP, none of the classified vegetation identified in Figure 2 will need to be removed to support the siting of the proposal. The proposal complies with A2.3.
A2.4 Storage of hazardous, flammable and/or combustible materials	The proposal incorporates a 300 MW Battery Energy Storage System (BESS) facility within the southern portion of the site. The battery units within this facility are considered hazardous, flammable, and/or combustible materials. Consequently, they have been appropriately sited away from significant sources of bushfire threat (Maximum of BAL-12.5). The battery units are located within a strictly non-vegetated hardstand area, surrounded by a minimum 10 m separation distance of non-combustible, low-threat land (e.g., paved or compacted earth perimeter roads and buffers) in accordance with CFA (2023) guidelines. This ensures that no flammable materials are within close proximity to the battery units, thereby minimising the threat of ignition within the site and preventing any potential fire from spreading to the surrounding vegetation (specifically the retained olive plantation which is actively managed to a low-threat state). The battery units are securely installed on a firm, non-combustible base, adhering to the provisions outlined in the guidelines. The proposal complies with A2.4.
Element 3: Vehicular access	
A3.1 Private Driveway	Access to the public road network is attained to the north of the site onto Orange Springs Road via a dedicated access track to the north, ensuring connectivity to the broader public road network. It also provides for an interconnected access arrangement that facilitate access throughout the site, including to the BESS facility. The internal driveway network has been designed to address the requirements of Table 10 of Appendix B.3, as shown in Plate 5, with a trafficable surface of 6 m provided throughout to allow for two-way traffic movements. Where applicable, turnaround areas compliant with Figure 30 of Appendix B.3 have been incorporated (shown in Figure 5), with internal intersections providing additional areas for turnaround. All proposed habitable buildings (such as the indicative office/packing area) are located adjacent to internal loop roads (private driveways), ensuring that fire units are capable of accessing habitable buildings and vacating the site whilst in forward gear, thereby enhancing accessibility and safety and providing the practical functionality of turnaround areas. The proposal complies with A3.1.

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Table 5: Assessment against the bushfire protection criteria from the Guidelines (continued)

Bushfire protection criteria	Proposed bushfire management strategies
Element 4: Water	
A4.1 Water Supply	The provision of dedicated water tanks (comprising 13 tanks sized to yield a collective on-site static reserve comfortably exceeding 288,000 L) for firefighting purposes significantly exceeds the requirements outlined in the applicable WA planning framework (SPP 3.7, Appendix B.4, Table 11), which requires a minimum of only 10,000 L. However, for a facility incorporating a 300 MW BESS, the Victorian Design Guidelines and Model Requirements: Renewable Energy Facilities (CFA 2023) represent current Australian best practice and recommend a significantly larger, risk-based water supply. These guidelines recommend the following (refer to pages 20-22 of the guidelines): • With a Sufficient Reticulated Water Supply: If the facility is connected to a water main capable of meeting the performance requirements of AS 2419.1-2021, it must be able to supply the full required flow rate for a continuous four-hour period directly from that connection. • Without a Sufficient Reticulated Water Supply: If no connection is available or the connection is inadequate, a dedicated on-site static water supply is required. It is of note that the guidelines do not provide an allowance to calculate a partial or "make-up" on-site storage volume. The volume is calculated as follows: ○ Minimum Requirement: The absolute minimum static water supply for a centralized BESS is 288,000 litres. This is based on two hydrants flowing simultaneously for four hours. ○ Scaling Volume: This volume increases based on the size of the BESS facility, which dictates the number of hydrants needed for full coverage. For each additional hydrant required, the static water supply must increase by 144,000 litres (representing an additional 10 L/s over 4 hours). As outlined in Section 1.4, reticulated water supply is not confirmed for the site and therefore is not relied upon for the purposes of this bushfire assessment. To ensure absolute compliance with the intent of the CFA best-practice guidelines, firefighting water requirements are designed to be met exclusively by 13 strategically distributed static water tanks. By deliberately sizing these tanks so that their combined volume alone exceeds the CFA's 288,000 L minimum baseline, this standalone static supply guarantees that a highly accessible volume of water is available simultaneously across the entire facility footprint. This approach easily satisfies both the mandatory WA framework and the rigorous expectations of Australian best practice for renewable energy facilities. The proposal complies with A4.1.

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Table 10: Vehicular access technical requirements

	1		2		3		4		5	
TECHNICAL REQUIREMENTS	PERIMETER ROADS		PUBLIC ROADS		EMERGENCY ACCESS WAY ³		FIRE SERVICE ACCESS ROUTE ³		BATTLE-AXE & PRIVATE DRIVEWAYS ¹	
MAP OF BUSH FIRE PRONE AREAS DESIGNATION	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1	Area 2	Area 1
Minimum horizontal clearance (metres)	12	8	See note 5		10	6	10	6	6	
Minimum vertical clearance (metres)	4.5									
Minimum weight capacity (tonnes)	15									
Maximum grade unsealed road ²	See note 5		See note 5		1:10 (10% or 6°)					
Maximum grade sealed road ^{2,4}					1:7 (14.3% or 8°)					
Maximum average grade sealed road					1:10 (10% or 6°)					
Minimum inner radius of road curves (metres)					8.5					

Notes:

¹ Driveways and battle-axe legs to comply with the Residential Design Codes and Development Control Policy 2.2 Residential Subdivision where not required to comply with the widths in this Appendix or the Guidelines.

² Dips must have no more than a 1 in 8 (12.5% - 7.1 degrees) entry and exit angle.

³ To have crossfalls between 3 per cent and 6 per cent.

⁴ For sealed roads only the maximum grade of no more than 1 in 5 (20 per cent) (11.3 degrees) for no more than 50 metres is permissible, except for short constrictions to 3.5 metres for no more than 30 metres in length where an obstruction cannot be reasonably avoided or removed.

⁵ As outlined in the Institute of [Public Works Engineering Australasia \(IPWEA\) subdivision guidelines](#), [Liveable Neighbourhoods](#), [Austroads Standards](#) Main Roads standard, supplement, policy or guideline and/or any applicable or relevant local government standard or policy.

Plate 5: Excerpt of Table 10 from Appendix B.3 of The Guidelines outlining vehicle access requirements

5.2 Additional management strategies

5.2.1 Future approval considerations

The BAL assessment in this BMP assesses the potential bushfire risk posed to future habitable buildings within the site, based on the assumptions outlined in **Section 3**.

The development will be subject to a building licence application as part of the construction process. It is noted that the class of building (likely Class 5, 6, or 7) will not be subject to the requirements of AS 3959. However, commercial building construction typically exceeds the requirements of AS 3959.

The *Building Act 2011* does not apply a bushfire construction standard to commercial buildings such as those associated with the proposed facility (including the indicative office/packing area and storage facility). Nevertheless, SPP 3.7 encourages the adoption of equivalent construction standards and risk treatments at the applicant's discretion, as outlined in Clause 3.7 of the Guidelines.

5.2.2 Landscape management

5.2.2.1 Within the site

The development footprint will include a mix of strictly non-vegetated hardstand areas (associated with the BESS infrastructure) and areas of managed vegetation (specifically the retained olive plantation). These areas will be designed and managed to achieve and maintain a low-threat or non-vegetated state in accordance with Clauses 2.2.3.2 (b), (e) and (f) of AS 3959. The site will continue to be actively managed for horticultural purposes, ensuring that slashing and irrigation will make up a large portion of the necessary ongoing maintenance practices.

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Regans Ford BESS Facility



Other ongoing management is likely to include:

- Irrigation of grass and garden beds (where required).
- Regular removal of weeds and built-up dead material (such as fallen branches, leaf litter, etc.).
- Low pruning of trees (branches below 2 m in height removed where appropriate).
- Application of ground/surface covers such as mulch or non-flammable materials as required.
- Regular mowing/slashing (or grazing) of grass to less than 100 mm in height.

The proponent (or future occupiers) will be responsible for the ongoing maintenance of these areas within the site.

5.2.2.2 Surrounding the site

All classified vegetation and excluded areas surrounding the site are expected to remain in their current condition based on existing long-term management regimes, or for the purposes of this BMP been conservatively assessed as unmanaged as detailed in **Section 3** above.

As indicated in **Figure 2**, the private landholdings surrounding the site are assumed to be managed by the applicable landowners in accordance with existing maintenance regimes and firebreak requirements. All other vegetation will remain in its existing condition for the foreseeable future.

5.2.3 Shire of Gingin Firebreak and Fuel Hazard Reduction Notice

The Shire of Gingin releases a Firebreak and Fuel Hazard Reduction Notice on an annual basis to provide a framework for bushfire management within the Shire. The Shire of Gingin is able to enforce this notice in accordance with Section 33 of the Bush Fires Act 1954. In addition, Section 33(1)(b) also provides the Shire with additional power to direct landowners to undertake works to remedy conditions conducive to the outbreak or spread of bushfire.

Prior to and post development within the site, the proponent will be required to comply with the Firebreak & Fuel Hazard Reduction Notice (as published).

5.2.4 Public education and preparedness

Community bushfire safety is a shared responsibility between individuals, the community, government, and fire agencies. DFES has an extensive Community Bushfire Education Program including a range of publications, a website, and Bushfire Ready Groups. The DFES website (<https://www.dfes.wa.gov.au/bushfire/prepare/>) provides a range of materials to help the community prepare for and survive the bushfire season.

The Shire of Gingin provides bushfire safety advice to residents, available from their website (<https://www.gingin.wa.gov.au/fire-information>). Professional, qualified consultants also offer bushfire safety advice and relevant services to residents and businesses in high-risk areas in addition to that provided in this BMP.

In the case of a bushfire in the area, advice would be provided to owners/occupants by DFES, the Department of Biodiversity, Conservation and Attractions (DBCA) and/or the Shire of Gingin on any specific recommendations with regard to responding to the bushfire, including shut down and/or evacuation if required.

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6 Responsibilities for Implementation and Management of Bushfire Measures

Table 6 outlines the future responsibilities of the proponent (developer) and the Shire of Gingin associated with implementing this BMP with reference to ongoing bushfire risk mitigation measures for existing land uses (through compliance with the Shire of Gingin Firebreak & Fuel Hazard Reduction Notice) or future mitigation measures to be accommodated as part of the development process. These responsibilities will need to be considered as part of the implementation and ongoing operation.

Table 6: Responsibilities for the implementation of this BMP during development and ongoing management

Proponent – Prior to Sale or Occupancy	
No.	Implementation and Management actions
1	Undertake development of the site in accordance with the proposed development layout plan, or as otherwise agreed with the Shire of Gingin, ensuring habitable buildings are positioned to achieve BAL-29 or less.
2	Where indicated as managed on Figure 2 and Figure 5 , the site is to be implemented and then managed on an ongoing basis to achieve a low-threat or non-vegetated state in accordance with Clauses 2.2.3.2 (b), (e) and (f) of AS 3959 in perpetuity. Other ongoing management is likely to include: • Irrigation of grass and garden beds (where required). • Regular removal of weeds and built-up dead material (such as fallen branches, leaf litter, etc.). • Low pruning of trees (branches below 2 m in height removed where appropriate). • Application of ground/surface covers such as mulch or non-flammable materials as required. • Regular mowing/slashing (or grazing) of grass to less than 100 mm in height
3	Install the private driveway network and the dedicated northern access track onto Orange Springs Road to the standards outlined in Appendix B.3 of the Guidelines, or as agreed with the Shire of Gingin. Private driveway alignments should be designed and maintained to achieve a low threat/non-vegetated state in accordance with Clause 2.2.3.2 (e) of AS 3959.
4	Install 13 dedicated static water tanks (minimum 20,000 L capacity each, providing a collective static supply exceeding 288,000 L) exclusively for firefighting purposes, in accordance with the standards outlined in Appendix B.4 Table 11 of the Guidelines, AS 2419.1-2021, and CFA (2023) best practice guidelines, or as agreed with the Shire of Gingin. Water supply systems must be located within areas that achieve a low-threat classification in accordance with Section 2.2.3.2 of AS 3959. A connection to a reticulated water supply is not required to satisfy this condition.
Shire of Gingin	
No.	Management action
1	Continue with existing controls to maintain fuel loads in existing public road reserves and public open space (under their management) in accordance with existing maintenance regimes, to minimise fuel loads.
2	Continue with existing controls to monitoring vegetation fuel loads in private landholdings against the requirements of the Shire of Gingin's Firebreak & Fuel Hazard Reduction Notice and liaising with relevant stakeholders to maintain fuel loads at minimal/appropriate fuel levels, in accordance with the Shire of Gingin's responsibilities under the <i>Bush Fires Act 1954</i> .

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Table 6: Responsibilities for the implementation of this BMP during development and ongoing management (continued)

Property owner/occupier	
No.	Management action
1	Where indicated as managed on Figure 2 and Figure 5 , the site is to be implemented and then managed on an ongoing basis to achieve a low-threat or non-vegetated state in accordance with Clauses 2.2.3.2 (b), (e) and (f) of AS 3959 in perpetuity. Other ongoing management is likely to include: • Irrigation of grass and garden beds (where required). • Regular removal of weeds and built-up dead material (such as fallen branches, leaf litter, etc.). • Low pruning of trees (branches below 2 m in height removed where appropriate). • Application of ground/surface covers such as mulch or non-flammable materials as required. Regular mowing/slashing (or grazing) of grass to less than 100 mm in height
2	Monitoring vegetation fuel loads within the site against the requirements of the Shire of Gingin's Firebreak & Fuel Hazard Reduction Notice (and/or existing maintenance regimes outlined in this BMP) and liaising with relevant stakeholders to maintain fuel loads at minimal/appropriate fuel levels.
3	Ensure the ongoing management of the water supply infrastructure by maintaining the connection to the reticulated water source and ensuring the 13 dedicated water tanks (providing a collective static capacity exceeding 288,000 L) remain operational, filled, and accessible for firefighting purposes. Regular inspections and maintenance should ensure the water supply systems remain within areas that achieve a low-threat or non-vegetated classification in accordance with Section 2.2.3.2 of AS 3959.
Water Corporation	
No.	Management action
1	The Water Corporation is responsible for the ongoing maintenance and repair of water hydrants.

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7 Applicant Declaration

7.1 Accreditation

This assessment has been prepared by Emerge Associates who have been providing bushfire risk management advice for more than 10 years, undertaking detailed bushfire assessments (and associated approvals) to support the land use development industry. Emerge Associates have a number of team members who have undertaken Bushfire Planning and Design (BPAD) Level 1 and Level 2 training and are Fire Protection Association of Australia (FPAA) accredited practitioners.

Anthony Rowe is a FPAA Level 3 BPAD accredited practitioner (BPAD No. 36690) in accordance with clause 9.10 of the Guidelines.

7.2 Declaration

I declare that the information provided is true and correct to the best of my knowledge.

Reviewer signature:

A handwritten signature in black ink, appearing to read "Anthony Rowe", written over a light grey dotted rectangular area.

Name: Anthony Rowe

Company: Emerge Associates

Date: 16 June 2026

BPAD Accreditation: 36690

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8 References

8.1 General references

The references listed below have been considered as part of preparing this document.

DBCA (2017). Ramsar Sites (DBCA-010). Department of Biodiversity, Conservation and Attractions.

DBCA. (2017). "Wheatbelt Wetlands Stage 1 (DBCA-021)." from https://public-services.slip.wa.gov.au/public/rest/services/SLIP_Public_Services/Environment/MapServer/19.

DBCA. (2022). "Threatened Ecological Communities (DBCA-038)." from <https://catalogue.data.wa.gov.au/dataset/threatened-ecological-communities>.

DPLH and WAPC (2024). Bushfire Management Plan (BMP) Manual. Planning.wa.gov.au.

DWER. (2021). "Clearing Regulations - Environmentally Sensitive Areas (DWER-046)." from <https://catalogue.data.wa.gov.au/dataset/clearing-regulations-environmentally-sensitive-areas-dwer-046>.

Gould, J., W. McCaw, N. Cheney, P. Ellis and S. Matthews (2007). Field Guide: Fuel Assessment and Fire Behaviour Prediction in Dry Eucalypt Forest. Perth, Western Australia, CSIRO and Department of Environment and Conservation.

OBRM. (2025). "Map of Bush Fire Prone Areas."

Standards Australia (2018). AS 3959:2018 Construction of buildings in bushfire-prone areas. Sydney.

WALIA. (2024). "Landgate Map Viewer Plus." from <https://map-viewer-plus.app.landgate.wa.gov.au/index.html>.

WAPC (2024). Planning for Bushfire Guidelines. Western Australian Planning Commission. Western Australia.

WAPC (2024). State Planning Policy 3.7 Busfire. Western Australian Planning Commission. Western Australia.

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Regans Ford BESS Facility



8.2 Online references

The online resources that have been utilised in the preparation of this report are referenced in **Section 8.1**, with access date information provided in **Table R-1**.

Table R 1 Access dates for online references

Reference	Date accessed	Website or dataset name
(OBRM 2025)	28 April 2026	Bush Fire Prone Areas
(WALIA 2024)	28 April 2026	Mapviewer Plus
(DBCA 2017)	28 April 2026	Wheatbelt Wetlands Stage 1
(DBCA 2017)	28 April 2026	Ramsar Sites
(DBCA 2022)	28 April 2026	Threatened ecological communities
(DWER 2021)	28 April 2026	Environmentally Sensitive Areas

Figures



Figure 1: Site Location and Environmental Features

Figure 2: AS 3959 Vegetation Classification and Effective Slope

Figure 3: Bushfire Attack Level Contour Plan

Figure 4: Broader Locality Plan

Figure 5: Spatial Representation of Bushfire Management Strategies

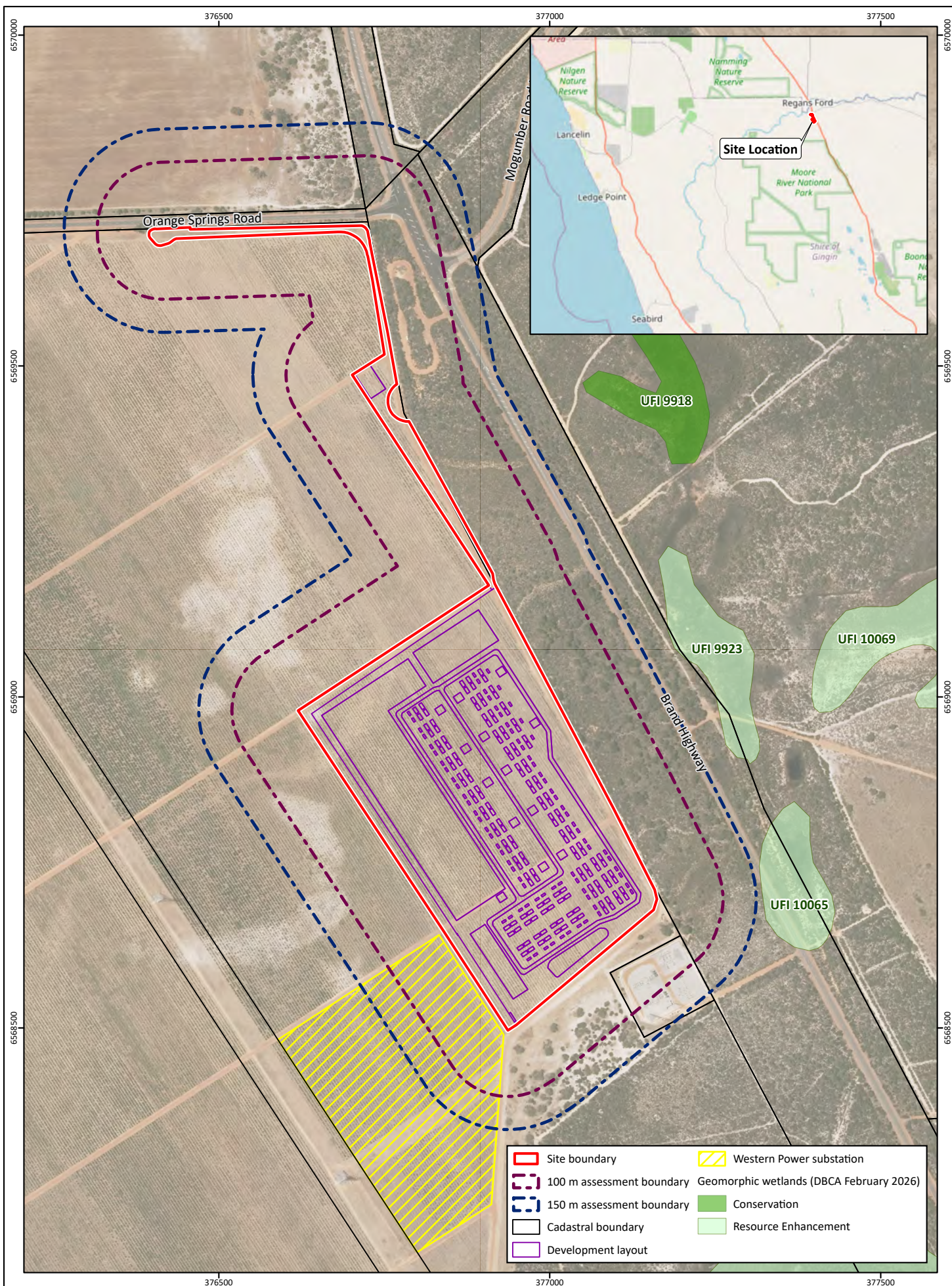


Figure 1: Site Location and Environmental Features

Project: Bushfire Management Plan
Reagans Ford BESS Facility

Client: Shizen Australia Pty Ltd

Plan Number: EP26-010(02)--F17
Drawn: GAR
Date: 14/05/2026
Checked: CPW
Approved: AJR
Date: 05/06/2026



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GDA2020 MGA Zone 50

emerge
ASSOCIATES

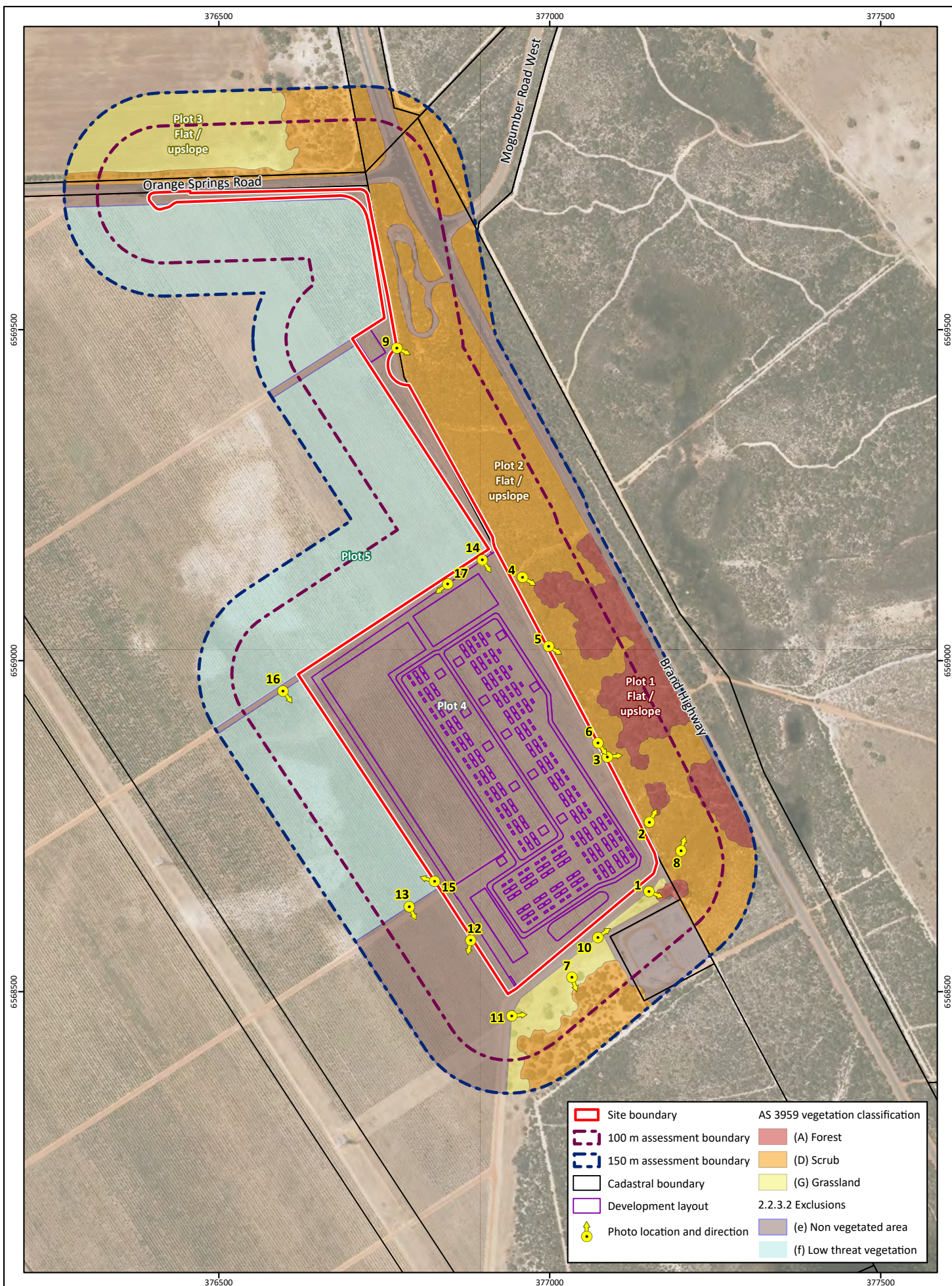


Figure 2: AS 3959 Vegetation Classification and Effective Slope

Project: Bushfire Management Plan
Reagans Ford BESS Facility

Client: Shizen Australia Pty Ltd

Plan Number: EP26-010(02)--F18
Drawn: GAR
Date: 14/05/2026
Checked: CPW
Approved: AJR
Date: 05/06/2026



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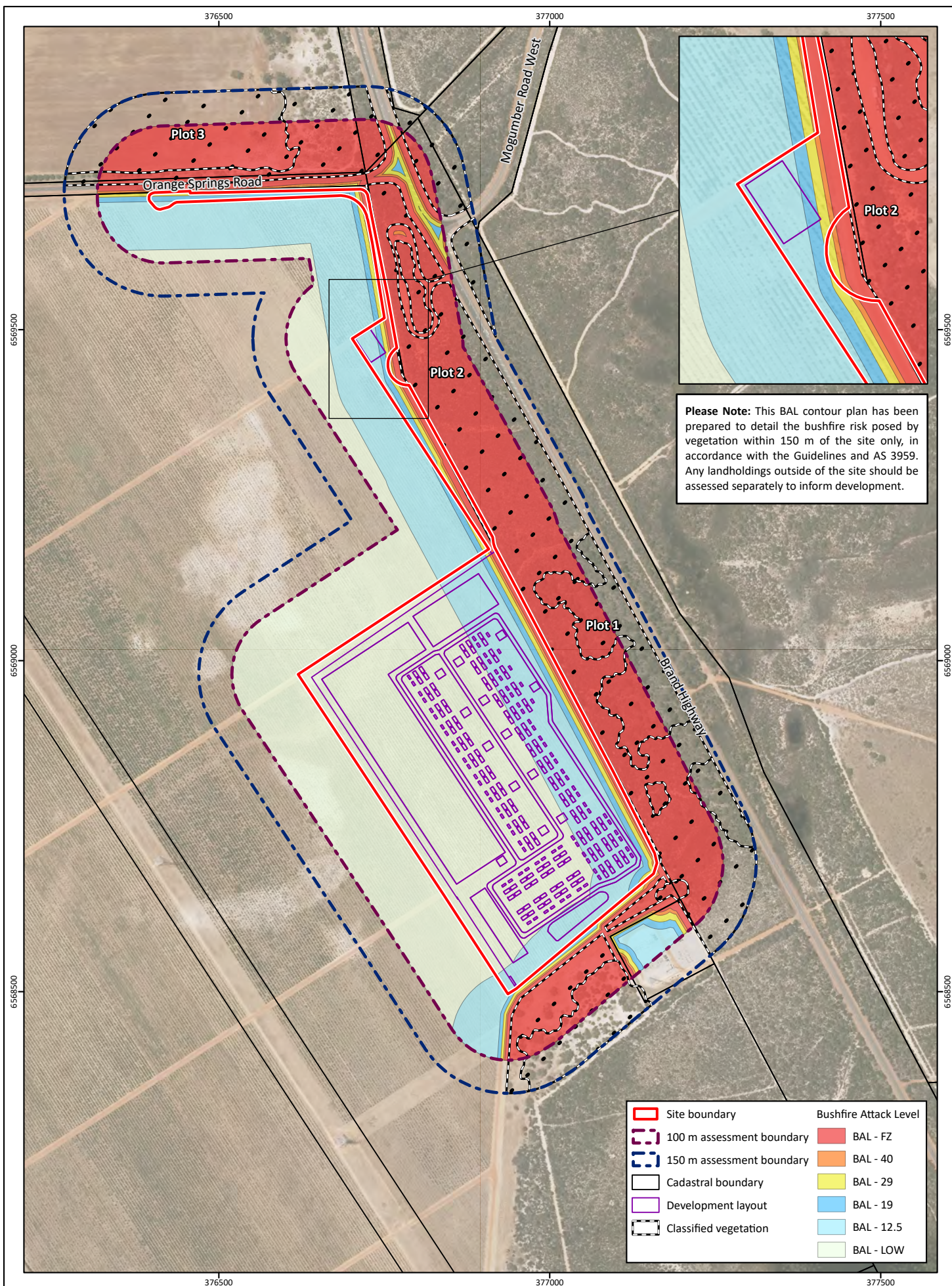


Figure 3: Bushfire Attack Level Contour Plan

Project: Bushfire Management Plan
Reagans Ford BESS Facility

Client: Shizen Australia Pty Ltd

Plan Number: EP26-010(02)--F19
Drawn: GAR
Date: 14/05/2026
Checked: CPW
Approved: AJR
Date: 05/06/2026



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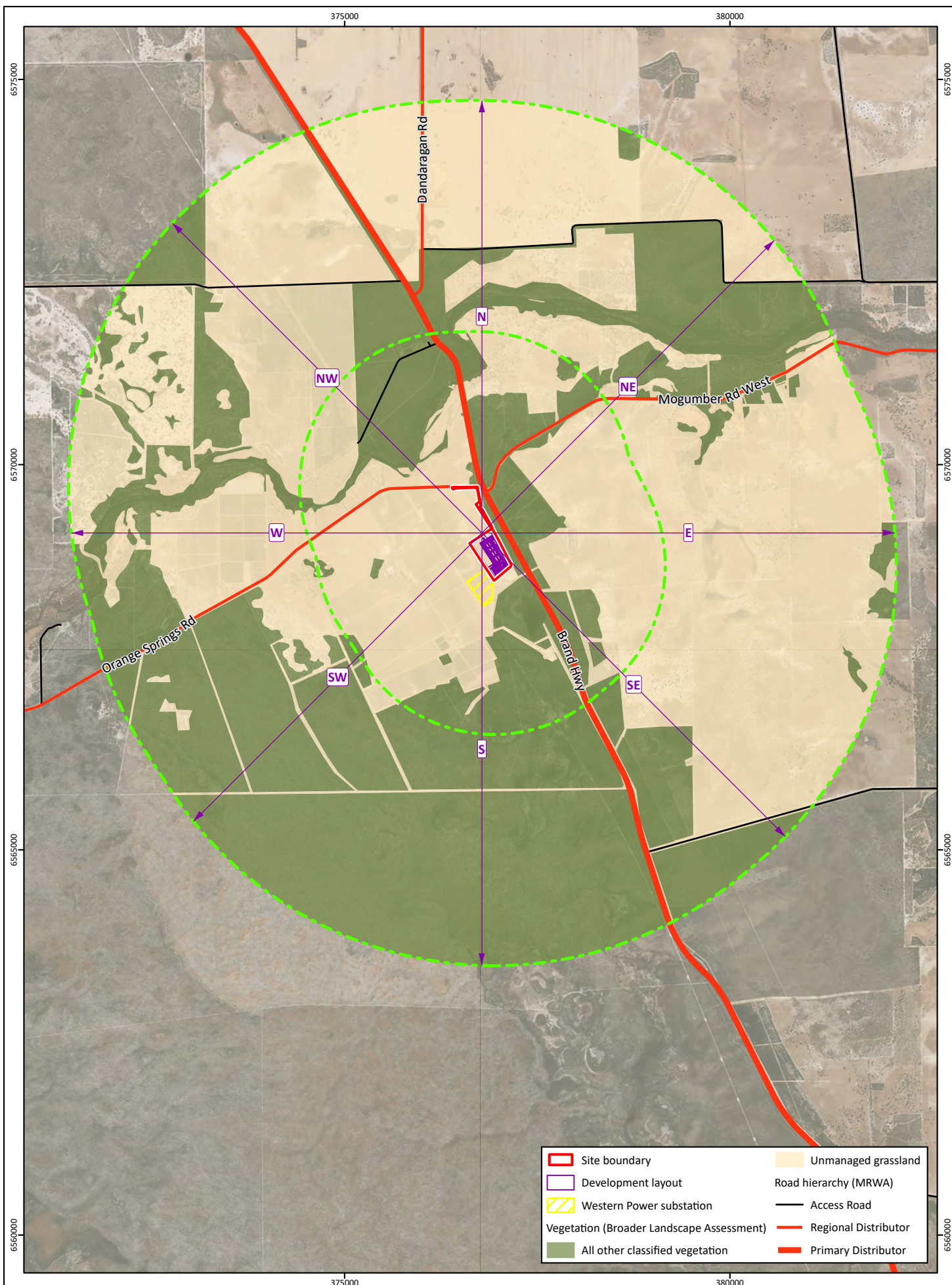


Figure 4: Broader Locality Plan

Project: Bushfire Management Plan
Reagans Ford BESS Facility

Client: Shizen Australia Pty Ltd

Plan Number: EP26-010(02)--F20
Drawn: GAR
Date: 14/05/2026
Checked: CPW
Approved: AJR
Date: 05/06/2026



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GDA2020 MGA Zone 50

emerge
ASSOCIATES

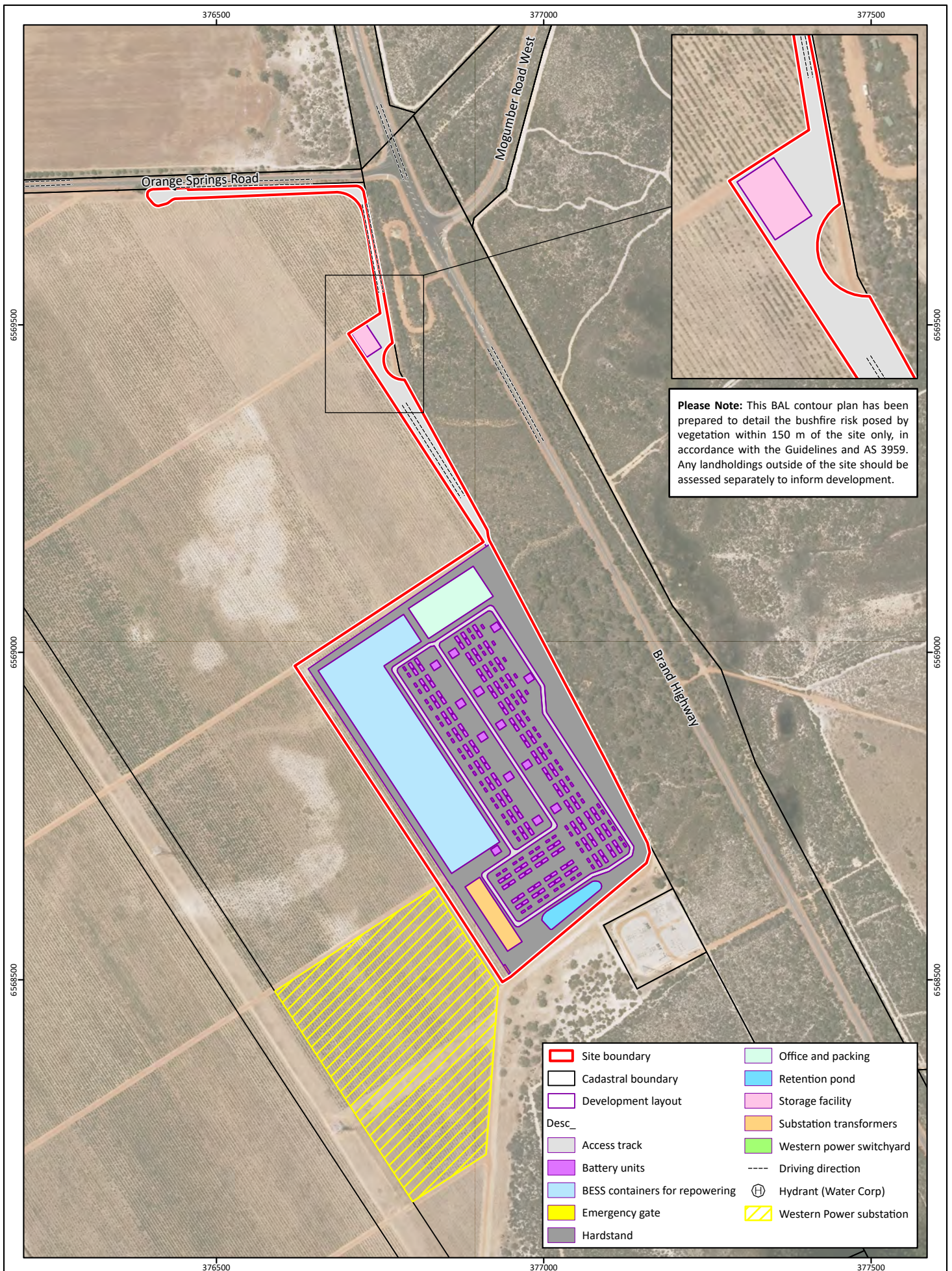


Figure 5: Spatial Representation of Bushfire Management Strategies

Project: Bushfire Management Plan
Reagans Ford BESS Facility

Client: Shizen Australia Pty Ltd

Plan Number: EP26-010(02)--F21
Drawn: GAR
Date: 14/05/2026
Checked: CPW
Approved: AJR
Date: 05/06/2026



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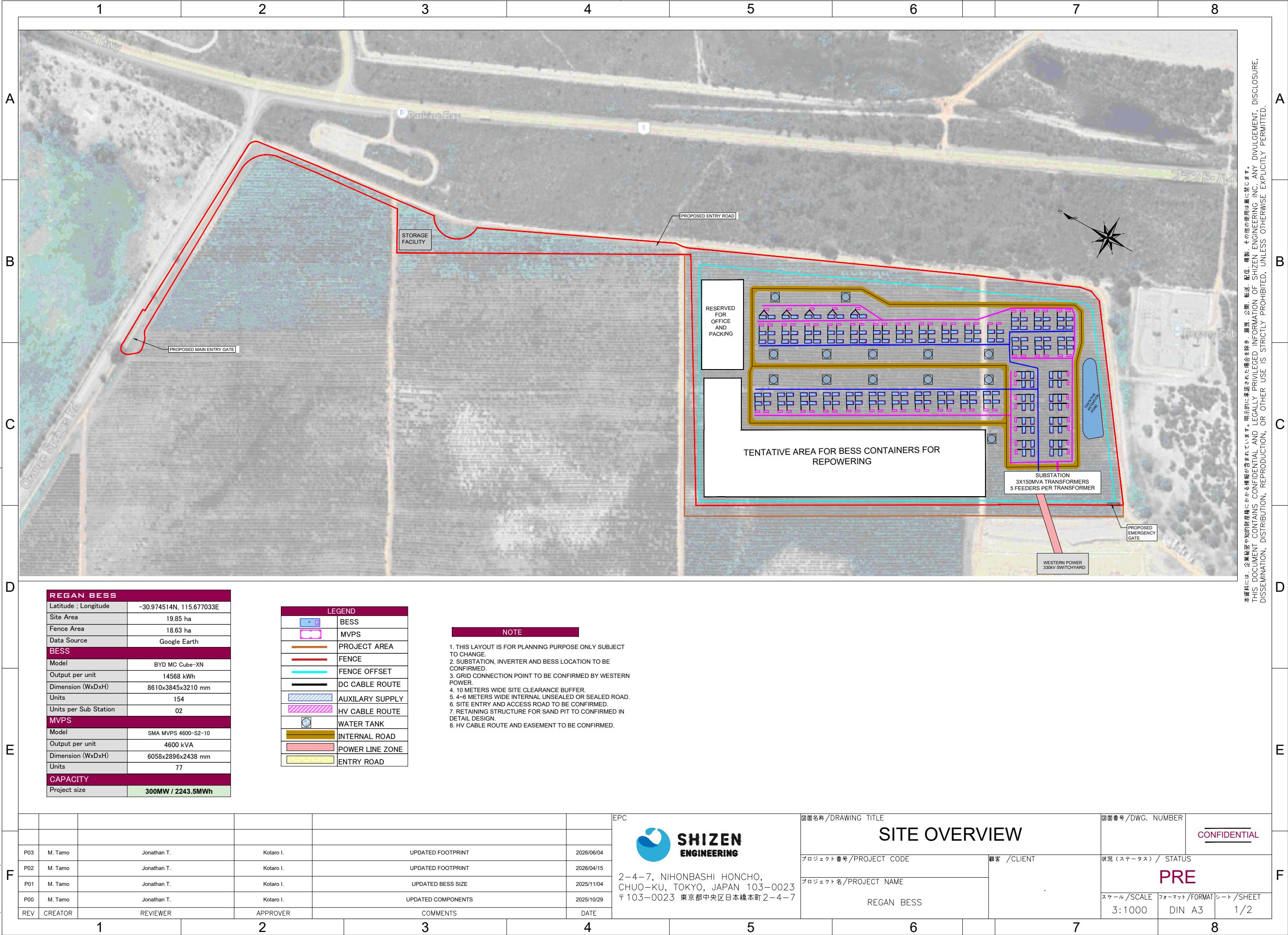


Appendix A

Proposed Development Layout



A3 - (420 x 297)mm



REGAN BESS	
Latitude ; Longitude	-30.974514N, 115.677033E
Site Area	19.85 ha
Fence Area	18.63 ha
Data Source	Google Earth
BESS	
Model	BYD MC Cube-XN
Output per unit	14568 kWh
Dimension (WxDxH)	8610x3845x3210 mm
Units	154
Units per Sub Station	02
MVPS	
Model	SMA MVPS 4600-S2-10
Output per unit	4600 kVA
Dimension (WxDxH)	6058x2896x2438 mm
Units	77
CAPACITY	
Project size	300MW / 2243.5MWh

LEGEND	
	BESS
	MVPS
	PROJECT AREA
	FENCE
	FENCE OFFSET
	DC CABLE ROUTE
	AUXILARY SUPPLY
	HV CABLE ROUTE
	WATER TANK
	INTERNAL ROAD
	POWER LINE ZONE
	ENTRY ROAD

- NOTE
1. THIS LAYOUT IS FOR PLANNING PURPOSE ONLY SUBJECT TO CHANGE.
 2. SUBSTATION, INVERTER AND BESS LOCATION TO BE CONFIRMED.
 3. GRID CONNECTION POINT TO BE CONFIRMED BY WESTERN POWER.
 4. 10 METERS WIDE SITE CLEARANCE BUFFER.
 5. 4-6 METERS WIDE INTERNAL UNSEALED OR SEALED ROAD.
 6. SITE ENTRY AND ACCESS ROAD TO BE CONFIRMED.
 7. RETAINING STRUCTURE FOR SAND PIT TO CONFIRMED IN DETAIL DESIGN.
 8. HV CABLE ROUTE AND EASEMENT TO BE CONFIRMED.

P03	M. Tamo	Jonathan T.	Kotaro I.	UPDATED FOOTPRINT	2026/06/04
P02	M. Tamo	Jonathan T.	Kotaro I.	UPDATED FOOTPRINT	2026/04/15
P01	M. Tamo	Jonathan T.	Kotaro I.	UPDATED BESS SIZE	2025/11/04
P00	M. Tamo	Jonathan T.	Kotaro I.	UPDATED COMPONENTS	2025/10/29
REV	CREATOR	REVIEWER	APPROVER	COMMENTS	DATE

EPC SHIZEN ENGINEERING 2-4-7, NIHONBASHI HONCHO, CHUO-KU, TOKYO, JAPAN 103-0023 〒103-0023 東京都中央区日本橋本町2-4-7	図面名称/DRAWING TITLE SITE OVERVIEW		図面番号/DWG. NUMBER	CONFIDENTIAL
	プロジェクト番号/PROJECT CODE		顧客 /CLIENT	
	プロジェクト名/PROJECT NAME REGAN BESS		状況 (ステータス) / STATUS PRE	
			スケール/SCALE 3:1000	
		フォーマット/FORMAT DIN A3	シート/SHEET 1/2	

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