

EPBC Act referral



Australian Government

Department of Agriculture, Water and the Environment

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Title of proposal	2021/8982 - Aldington Road Estate Industrial Development
Section 1	
Summary of your proposed action	
1.1 Project industry type	Private
1.2 Provide a detailed description of the proposed action, including all proposed activities	
<p>The proposed action involves the subdivision of eight lots in three areas on Aldington Road, Kemps Creek for the construction and operation of warehouse and distribution facilities.</p> <p>Construction will involve demolition, bulk earthworks, vegetation removal, construction of water retention basins, internal roads and widening of Aldington Road. Specific to each area includes the following:</p> <p>Area 1 - a local Development Application (DA) is intended to be submitted for the following:</p> <ul style="list-style-type: none">o A 2-lot subdivisiono fit-out and operation of warehouse and distribution buildings, including offices, loading docks, parking and hardstand areas, landscaping, utilities and services,o associated works include demolition and bulk earthworks, vegetation removal, construction of a public access road,o widening of Aldington Road, ando preservation of environmental conservation (E2) land <p>Area 2 - a State Significant Development Application (SSDA) is intended to be submitted for the following:</p> <ul style="list-style-type: none">o a 9-lot Torrens Title subdivisiono fit-out and operation of two warehouse and distribution buildings, including offices, loading docks, parking and hardstand areas, landscaping, utilities and services,o associated works include demolition and bulk earthworks, vegetation removal, construction of internal roads, and an access road off Aldington Road, construction of three water retention basins, ando widening of Aldington Road <p>Area 3 - future development as an industrial subdivision estate and expansion of Area 2</p>	
1.3 What is the extent and location of your proposed action?	
See Appendix B	
1.5 Provide a brief physical description of the property on which the proposed action will take place and the location of the proposed action (e.g. proximity to major towns, or for off-shore actions, shortest distance to mainland)	
<p>The proposed action is located at Aldington Road, Kemps Creek, NSW within the Penrith LGA and the Mamre Road Precinct of the Western Sydney Employment Area (WSEA) (see Figure 1.Location plan). The Precinct is located approx. 40 kilometres west of the Sydney central business district (CBD).</p> <p>All areas are bounded by Aldington Road to the east and various parcels of land also being developed for industrial purposes extend from the western boundary to Mamre Road further west.</p> <p>Land along the eastern side of Aldington Road is also zoned for industrial purposes. Land to the north and south and between Area 1 and Area 2 comprise privately owned rural residential land (zoned as Industrial).</p> <p>The subject land is characterised by cleared pasture, market gardens and rural residences overlying gently undulating topography sloping from northeast to the southwest.</p> <p>Ground levels of approximately 96 m AHD are present in the northeast falling to approximately 56 m AHD in the southwest.</p>	
1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?	
<p>The referral action area is 73.46 ha, which extends across the following Lots:</p> <ul style="list-style-type: none"># 99-111 Aldington Road (Lot 37 DP 258949)# 155-167 Aldington Road (Lot 33 DP 258949)# 169-181 Aldington Road (Lot 28 DP 255560)# 183-197 Aldington Road (Lot 27 DP 255560)# 199 Aldington Road (Lot 26 DP 255560)	



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201-217 Aldington Road (Lot 25 DP 255560)
219-233 Aldington Road (Lot 24 DP 255560)
235-251 Aldington Road (Lot 10 DP 253503)

With the exception of 99-111 Aldington Road (Lot 37 DP 258949) the full extent of each lot will be disturbed by bulk earthworks. This due to the rise and fall in elevation from Aldington Road to the western boundary of the project area (and general fall in elevation from northeast to southwest) and necessity to provide level industrial building pads and heavy vehicle access.

An area of 1.8 ha on Lot 37 DP 258949 is being retained for Environmental Conservation (see Figure 4.).

1.7 Proposed action location

Other - Various lots on Aldington Road Kemps Creek refer Section 1.6 of this referral

1.8 Primary jurisdiction

New South Wales

1.9 Has the person proposing to take the action received any Australian Government grant funding to undertake this project?

☐ Yes ☒ No

1.10 Is the proposed action subject to local government planning approval?

☒ Yes ☐ No

1.10.1 Is there a local government area and council contact for the proposal?

☐ Yes ☒ No

1.11 Provide an estimated start and estimated end date for the proposed action

Start Date	01/04/2022
End Date	01/12/2022

1.12 Provide details of the context, planning framework and state and/or local Government requirements

1. The principal environmental planning instrument for the subject land is the SEPP Western Sydney Employment Area (WSEA). The SEPP WSEA was amended in June 2020 following the rezoning of the Mamre Road Precinct (the Precinct) and inclusion within the WSEA. The Precinct provides approximately 850 hectares of industrial land and preserves land for environmental conservation and open space as well as protect a site for a potential Western Sydney freight intermodal terminal (IMT). An estimated 5,200 construction jobs and 17,000 ongoing jobs when fully developed, will be created. Development within the Precinct is to generally be in accordance with the Precinct Structure Plan, which forms the basis for urban development in the Precinct.

2. A Draft Mamre Road Precinct DCP was on exhibition between 10 November and 17 December 2020 and is currently being finalised by the DPIE. Penrith City Council is the consent authority for all development in the area to which this DCP will apply, unless otherwise authorised by the EP&A Act. The DCP provides planning controls for future development in the Precinct including building design controls, a road network, drainage strategy and landscaping and biodiversity controls.

3. A Draft Cumberland Plain Conservation Plan (CPCP) provides a range of planning controls to protect identified high-value biodiversity in Western Sydney. The CPCP will provide a strategic biodiversity approval under relevant State and Commonwealth legislation, which will apply to the Precinct. As the CPCP has not yet been endorsed:

Matters protected under Part 3 of the EPBC Act are being addressed through this referral, and

Under Division 2 Section 6.7 of the Biodiversity Conservation Act 2016, the proposed action's biodiversity impacts have been assessed through application of the Biodiversity Biodiversity Assessment Method (BAM), which is documented in Biodiversity Development Assessment Reports (refer section 1.14 of this referral).



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It is understood that under Principle 1 of the Department's referrals policy for strategic assessments, the Department would prefer that proposals are considered as part of the strategic assessment if relevant, rather than assessed individually. This was conveyed by the Department via email (reference: EPBC 2021/8982 - Aldington Road Estate Industrial Development - Resubmission Request dated Wednesday, 30 June 2021 4:18 PM. The Department also indicated that that draft CSCP (and subject of strategic assessment) is expected to be approved in the first quarter of 2022.

The Applicant appreciates the importance of the CSCP strategic assessment but delaying the development assessment and approval process into the first quarter of 2022 is not feasible. Since submitting EPBC 2021/8982 - Aldington Road Estate Industrial Development, the Applicant has submitted a State significant development application (SSD17552047) for Area 2 of the referral action area, and is well progressed in the preparation of a local DA for Area 1 to be lodged shortly. Area 3 has planning underway with the intention to lodge a DA for industrial warehouses thereafter.

1.13 Describe any public consultation that has been, is being or will be undertaken, including with Indigenous stakeholders

In accordance with SSDA and local government DA assessment process, the applications and all supporting information will be exhibited on the DPIE major projects website and Council's website. This will allow for any member of the community to provide commentary on the proposed action and participate in the SSD and DA processes. Consultation activities include the following:

Area 1:

Precinct E2 zoning with DPIE on 7 and 26 August 2020 and Pre-DA with Penrith City Council (Council) on 9 March 2021. Public consultation will be undertaken with other relevant stakeholders as a component of the DA process.

Area 2:

Consultation is currently being undertaken with the relevant authorities and stakeholders whilst preparing a detailed Environmental Impact Statement (EIS) in keeping with the NSW Major Project Community Consultation Guidelines. Public consultation includes the surrounding schools, retirement villages and landowners.

Consultation with the Aboriginal community has been facilitated in an interim Aboriginal Cultural Heritage Assessment (ACHA) prepared by Biosis (3 June 2021). Eighteen Aboriginal groups have registered their interest in the project and for consultation. During an archaeological survey on the 12 April 2021 the Deerubbin LALC representative Steven Randall attended. The interim ACHA is appended as Aldington Estate_ACHA.pdf.

Area 3: Public consultation will be undertaken with relevant stakeholders as a component of the future environmental assessment process for this area.

1.14 Describe any environmental impact assessments that have been or will be carried out under Commonwealth, State or Territory legislation including relevant impacts of the project

It is anticipated that the proposed action will be assessed in accordance with the Bilateral agreement made under section 45 of the EPBC Act. The Bilateral agreement allows for the Commonwealth Minister to accept the assessment process of the State Minister for Planning, however the approval decision remains with the Commonwealth Minister. As such, this referral has been prepared to obtain certainty. Relevant environmental assessments undertaken or being undertaken include the following:

Area 1: BDAR, ACHA, Contamination and Water Cycle Management report - in preparation

Area 2:

- # Contamination assessment (JBS&G 18 May 2021)
- # Remediation Action Plan (JBS&G 19 May 2021)
- # BDAR (ecologique 3 June 2021)
- # ACHA (Biosis 3 June 2021)
- # Historical Heritage Report, Biosis (3 June 2021)

1.15 Is this action part of a staged development (or a component of a larger project)?

☒ Yes ☐ No

1.15.1 Provide information about the larger action and details of any interdependency between the stages/components and the larger action

The three different areas, represent three different stages of the project.



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1.16 Is the proposed action related to other actions or proposals in the region? <input checked="checked" type="checkbox"/> Yes <input type="checkbox"/> No
1.16.1 Identify the nature/scope and location of the related action (Including under the relevant legislation) Area 2 and 3 are adjacent stages and will be developed sequentially. Area 1 is independent and will be developed separately.



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Section 2

Matters of national environmental significance

2.1 Is the proposed action likely to have any direct or indirect impact on the values of any World Heritage properties?

☐ Yes ☒ No

2.2 Is the proposed action likely to have any direct or indirect impact on the values of any National Heritage places?

☐ Yes ☒ No

2.3 Is the proposed action likely to have any direct or indirect impact on the ecological character of a Ramsar wetland?

☐ Yes ☒ No

2.4 Is the proposed action likely to have any direct or indirect impact on the members of any listed species or any threatened ecological community, or their habitat?

☒ Yes ☐ No

Species or threatened ecological community

The proposed action will directly impact 0.46 ha of Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 849). PCT 849 aligns to the EPBC Act critically endangered ecological community “Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest”.

Impact

Not considered likely to result in a significant impact.

PCT 849 on Lot 37 DP 258949, and the subject of this referral is 0.46 ha in extent. Site integrity data collected by Biosis (2019) to inform the Draft CPCP resulted in a canopy coverage of 37.5%, absence of shrub layer and native ground layer coverage of only 10.6%.

The subject patch is less than 5 ha and with a perennial native vegetation understorey of less than 30% but is contiguous with a patch of derived native grassland (within 50 m) that contains >greater than 50% native species and is also less than 100m from a large CPW patch which is greater than 5 ha (see Figures 4 and 4a).

The subject patch is relatively small and largely consists of juvenile regrowth with the understorey infested with blackberry in the shrub layer, pastoral grasses/weeds in the ground layer.

Species or threatened ecological community

Two threatened species, listed as vulnerable have been identified within the project land, these being:

- Chalinolobus dwyeri (large-eared pied bat); and
- Pteropus poliocephalus (grey-headed flying fox).

Impact

Significance of impact assessments are provided for each of these species in Aldington Estate_EPBC significance of assessment.pdf (Appendix C).

The assessment for the large-eared pied bat concluded that proposed action is unlikely to significantly impact upon the species due to the following:

- # The project area does not contain any sandstone escarpments, fertile valleys, intact remnant vegetation or moderately-tall



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to taller trees along rivers and creek lines, which are considered important to the species.

The project area does not occur at the limit of the species' range.

The project area is not considered to contain an important population of the species.

The vegetation in which the species was recorded is being retained and protected.

The vegetation to be removed comprise four disjunct and small patches of immature woodland with limited mature larger trees.

98% of the project area comprises pasture, market gardens, rural residences, agricultural dams and other cleared areas.

More intact timbered areas are located to north east of the project land which will be retained as environmental conservation areas.

The assessment for the grey-headed flying fox concluded that proposal is unlikely to significantly impact upon the species due to the following:

The project area does not critical habitat for the species.

The project area does not occur at the limit of the species' range.

The project area is not considered to contain an important population of the species.

The vegetation to be removed comprise four disjunct and small patches of immature woodland with limited mature larger trees.

98% of the project area comprises pasture, market gardens, rural residences, agricultural dams and other cleared areas.

Anecdotal evidence of the species using the site is limited exotic species which are not included in the definitions of habitat important to the species.

An additional significance of assessment was conducted to discount the likelihood of the listed vulnerable *Litoria aurea* (green and golden bell frog).

The green and golden bell frog, while considered unlikely to occur within the project land, has not been surveyed in accordance with the Significant Impact Guidelines (DEWHA 2009) and is therefore a significance of impact assessment is provided. The project area contains several farm dams that vary in size from 0.22 ha up to 2 ha. Most of the dams (not all) contain patches of *Typha orientalis* (broad leaf cumbungi), which is known to provide habitat for the species.

The likelihood of the species was discounted as suitable microhabitat is absent from the project land and the species has not been detected despite a number of targeted surveys for the species in the locality (refer Aldington Estate_Figure 5 GGBF surveys.pdf provided in Appendix B).

Amphibian surveys were limited to 30-60-minute listening surveys at dusk and dawn at dams where emergent cumbungi was present in small to medium size patches, but repetitive surveys were not completed. Surveys commenced prior to a severe flood event in Sydney (during March 2021) at which time many areas of the project land became inaccessible.

The assessment for the green and golden bell frog concluded that proposal is unlikely to significantly impact upon the species due to the following:

The project area does not considered to contain a population of the species.

The project area does not occur at the limit of the species' range.

The project area does not habitat for the species and the broader landscape is not known to support populations of the species.

2.4.2 Do you consider this impact to be significant?

☐ Yes ☒ No

2.5 Is the proposed action likely to have any direct or indirect impact on the members of any listed migratory species or their habitat?

☐ Yes ☒ No

2.6 Is the proposed action to be undertaken in a marine environment (outside Commonwealth marine areas)?

☐ Yes ☒ No



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2.7 Is the proposed action likely to be taken on or near Commonwealth land? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.9 Is the proposed action likely to have any direct or indirect impact on a water resource from coal seam gas or large coal mining development? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.10 Is the proposed action a nuclear action? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.11 Is the proposed action to be taken by a Commonwealth agency? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.12 Is the proposed action to be undertaken in a Commonwealth Heritage place overseas? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2.13 Is the proposed action likely to have any direct or indirect impact on any part of the environment in the Commonwealth marine area? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No



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Section 3

Description of the project area

3.1 Describe the flora and fauna relevant to the project area

Flora and fauna investigations within the project area identified 91 plant species, of which 33 are native and 58 are exotic. No threatened flora species were found in the project area. A total of 77 animal species were recorded, of which 11 are introduced. Three fauna species listed under the EPBC Act were detected utilising the study area, which include the following:

- *Chalinolobus dwyeri* (large-eared pied bat) potential record from Area 1 – listed as Vulnerable
- *Pteropus poliocephalus* (grey-headed flying fox) anecdotal record from landowner in Area 2 – listed as Vulnerable
- *Rhipidura rufifrons* (rufous fantail) observed in Area 2 – listed as Migratory and Marine

Five species listed under the BC Act were detected utilising the study area, which include the following:

- *Hieraaetus morphnoides* (little eagle) observed flying over Area 1, Vulnerable
- *Miniopterus orianae oceanensis* (large bent-winged bat) recorded from Area 2, Vulnerable
- *Saccolaimus flaviventris* (Yellow-bellied sheath-tail bat) recorded from Area 2, Vulnerable
- *Falsistrellus tasmaniensis* (eastern false pipistrelle) recorded from all Areas, Vulnerable
- *Micronomus norfolkensis* (eastern coastal free-tailed bat) recorded from all Areas, Vulnerable

Four plant communities were identified (refer Section 2.4) all native vegetation communities within the proposed action's subject land are typified by few residual remnant native trees, juvenile regrowth of native trees, a lack of native shrubs and understorey dominated by introduced weed species.

The potential for the subject area to provide habitat of importance to threatened species under both the EPBC Act and NSW BC Act has been assessed during the following:

- Preparation of a BDAR for Area 1
- Completed BDAR for Area 2, and
- Due diligence assessments for Area 3 (i.e., preliminary biodiversity impact investigations)

These assessments have considered the potential for the presence of threatened species and/or the potential for the subject area to contain habitat for threatened species, both identified by application of the BAM and listed under the EPBC Act protected matters search tool results for an area extending in a 10 km radius from the subject land.

It has been concluded that the proposed action is unlikely to have a significant impact on any matters of MNES (refer to the appended Aldington Estate_EPBC significance of assessment.pdf).

3.2 Describe the hydrology relevant to the project area (including water flows)

The proposed action is located on land that drains to Kemps Creek a tributary of South Creek.

CT Environmental (2019) investigated the presence of mapped and potential unmapped waterways across the Precinct. Results of this study have informed the development of a Riparian Corridor Strategy for the Precinct.

No areas of riparian corridors were identified within the subject land.

3.3 Describe the soil and vegetation characteristics relevant to the project area

The project area predominantly overlies the Luddenham soil landscape with smaller areas of Second Ponds soil landscape at lower elevations.

Luddenham soil landscape is an erosional landscape typically occurring on hills and low hills on Wianamatta Group Bringelly Shale (shale, sandstone-lithic and siltstone/mudstone) in the Cumberland Plain and Blue Mountains Plateau. Degradation of this landscape is reported as: moderate gully erosion on steep slopes; moderate sheet erosion, with unstable slopes where mass movement may occur.

Vegetation associated with the Luddenham soil landscape is extensively cleared Grey Box Woodland dominated by *Eucalyptus moluccana* (grey box) and *E. tereticornis* (forest red gum), with some sites having *E. crebra* (narrow-leaved ironbark) as a co-dominant species. This landscape has a mixture of Shale Hills Woodland and Shale Plains Woodland (NPWS, 2000).

Second Ponds soil landscape is a transferral landscape, which occur on the foot slopes and plains on Colluvium/Alluvium and Wianamatta Group Shale (shale and colluvium) in the Cumberland Plain. Transferral soil landscapes are formed on deep deposits of mostly eroded parent materials washed from areas upslope. Degradation of this landscape is reported as: locally severe salt scalding and associated erosion on lower slope positions. Localised gully erosion along drainage depressions



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Vegetation associated with the Second Ponds soil landscape includes Shale Plains Woodland and Alluvial Woodland. The Shale Plains Woodland is dominated by *Eucalyptus tereticornis* (forest red gum) and *E. moluccana* (coastal grey box). The Alluvial Woodland contains *E. amplifolia* (cabbage gum), *Angophora floribunda* (rough-barked apple) and *E. tereticornis* (forest red gum).

3.4 Describe any outstanding natural features and/or any other important or unique values relevant to the project area

Not applicable, there are no outstanding natural features and/or any other important or unique values relevant to the study area

3.5 Describe the status of native vegetation relevant to the project area

Vegetation within the project area is, for the most part, highly modified and degraded. The project area largely supports vegetation characterised as exotic grassland and plantings of both non-local native and exotic trees (see Figure 4b).

Native vegetation is limited to the scattered paddock trees and isolated patches of poor condition communities that have been under scrubbed and historically comprised paddock trees. The current extent of native vegetation is evident of more recent cessation of agricultural practices and juvenile regenerative growth emerging around more mature paddock trees. All areas lack a native shrub layer and are dominated by introduced shrub and ground species.

The proposed action will impact upon 2.11 ha of native vegetation, comprising:

- 1.6 ha of Grey Box – Forest Red Gum grassy woodland on flats of the Cumberland Plain, Sydney Basin Bioregion (PCT 849): which aligns to the EPBC Act critically endangered ecological community “Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest”, however only 0.46 ha of this PCT potentially meets the condition thresholds outlined within the Listing Advice (DAWE 2010) - refer Section 2.4 of this referral.
- 0.23 ha of Forest Red Gum – Rough-barked Apple grassy woodland of the Cumberland Plain, Sydney Basin Bioregion (PCT 835): which aligns to the EPBC Act critically endangered ecological community “River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria”, however this PCT does not meet the condition thresholds outlined within the Listing Advice (DAWE 2020).
- 0.28 ha of *Phragmites australis* and *Typha orientalis* coastal freshwater wetlands of the Sydney Basin Bioregion (PCT 1071), which has been allocated to farm dam areas containing native macrophytes. PCT 1071 is not aligned with any EPBC Act threatened ecological communities.

Areas of PCT 849 and PCT 835 in Area 2 do not meet the diagnostic and condition thresholds for consideration as an MNES under the EPBC Act, as follows:

- PCT 835 on Lot 33 DP 258949 is less than 0.5 ha in size and is not contiguous with any other patches of native vegetation.
- PCT 849 on Lot 25 DP 255560 is less than 0.5 ha in size and is not contiguous with any other patches of native vegetation.
- PCT 849 on Lot 33 DP 258949 does not have a sufficient percentage or species richness in the understorey to meet condition thresholds.

PCT 849 on Lot 37 DP 258949 (the subject patch) while less than 0.5 ha in size is contiguous with larger patches of PCT 849 (less than 100m in distance from the larger patches, which cumulatively result in a patch size greater than 30 ha). The subject patch does not contain a sufficient percentage of native ground layer species to meet the condition thresholds for consideration as a MNES, but is located approximately 40m from a patch of derived native PCT 849 grassland (DNG), which contains >greater than 50% native species (see Figure 4a).

This referral seeks concurrence as to whether or not removal of this vegetation would be considered a controlled activity.

3.6 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area

Depth range is not applicable as the project area is not within a marine area.

Gradients within the project area fall in elevation over 40m from the north to southwest (95m to 55m AHD) with elevation falls from the east to west ranging between 20m (at northern end of site) to 5-10m (at southern end of site).

3.7 Describe the current condition of the environment relevant to the project area

The project area largely supports cleared land used for market gardens and pasture, agistment, a disused harness training track, several farm dams, rural residential and associated buildings. Remnant native vegetation is limited to scattered



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paddock trees and small isolated patches of vegetation that largely consists of juvenile regrowth and an understorey dominated by weeds.

Larger areas of planted exotic trees dominated by pine trees occur along the Aldington Road-street frontage, along lot boundaries and surrounding residential areas (see Figure 4b).

The project area does not contain any watercourses and with the exception of Area 1, vegetation within the project area is significantly isolated from surrounding more intact vegetation and does not provide any wildlife continuity.

Site characterisation and conclusions provided in the detailed site investigation for Area 2 (JBS&G, 18 May 2021) are summarised below:

The majority of the site is made up of undeveloped pastoral land, with horticultural activities making up the balance of the site. A review of the site history indicates the site and surrounding area land uses have been consistent since the 1970's;

A total of 438 soil locations have been advanced within the site which identified filling and stockpiled material in isolated areas of the site. ACM was identified on the ground surface and within surficial soils (< 0.1 m bgs) at AEC 1a, 1b, 1e and 6c;

All individual or 95% UCL COPC concentrations were below the adopted site criteria, with the exception of elevated TRH and PAHs at TP398_0.0-0.2. Review of the test pit log from TP398 indicated that the given odours, staining and proximity to vehicle garages the source of the TRH and PAH impact is likely mechanical maintenance or inclusions of asphalt. The impact has been vertically delineated and is considered to be highly localised (15 m3). Remediation and management is required;

ACM identified on the ground surface, affixed to stockpiled concrete slabs (5 m3) and within surficial soils (< 0.1 m bgs) at AEC 1a, 1b, 1e and 6c requires remediation and management;

ACM identified within subsurface soils (> 0.1 m bgs) below the adopted site criteria at TP460_2.0-2.6 and TP463_0.8-1.8 (AEC 1f) will require management if AEC 1f is subject to cut and fill activities to ensure no visible asbestos is within surface soil (< 0.1 m bgs) and to meet WHS requirements;

All concentrations of COPCs in groundwater during the current investigation were below the adopted site criteria. Heavy metal concentrations in groundwater are considered to represent typical concentrations of an urban area;

All COPC concentrations in dam surface water samples were below the adopted site criteria;

Based on these findings JBS&G concluded that the site can be made suitable for the proposed commercial/industrial land use subject to remediation and/or management of identified contamination under a Remediation Action Plan (RAP).

The RAP prepared by JBS&G for Area 2 is appended (see 7. Aldington Estate_RAP).

3.8 Describe any Commonwealth Heritage places or other places recognised as having heritage values relevant to the project

An Historical Heritage Assessment (refer appended Aldington Estate_Heritage.pdf (Biosis 3 June 2021) for Area 2 found the following:

Potential archaeological remains and built structures within the project land do not satisfy heritage criterion at a local or state level.

The project area is not associated with a significant figure or community group within the local area and possesses low aesthetic value due to the widespread disturbances.

There are no recorded items of heritage significance in or adjacent to the project area. Works can proceed with caution as it has been assessed as possessing low archaeological potential.

There are no Commonwealth Heritage places or other places recognised as having heritage values relevant to Area 1 and due to the similar land use history within Areas 1 and 3, it is anticipated that there will not be any Commonwealth Heritage places or other places recognised as having heritage values.

3.9 Describe any Indigenous heritage values relevant to the project area

An Interim ACHA - refer appended Aldington Estate_ACHA.pdf (Biosis 3 June 2021) found:



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No Aboriginal objects identified in the project area

One area of potential archaeological deposit (PAD) (Aldington PAD 1) was identified on a relatively undisturbed, flat, hill crest at the headwaters of a dammed drainage line.

Predictive modelling and previous archaeological assessments in the vicinity have shown such landforms to contain sporadic or low density artefact scatters which may be present in the study area and this was supported by Deerubbin LALC representative Steven Randall, who attended site investigations.

The remainder of the project area was assessed with low potential due to a high degree of disturbance or steep sloping landforms which are less likely to contain Aboriginal objects.

As the Aldington PAD 1 is an area of potential, its cultural, historical, scientific and aesthetic significance are not currently known, further assessment in the form of test excavations will be undertaken.

3.10 Describe the tenure of the action area (e.g. freehold, leasehold) relevant to the project area

The land is freehold title owned by FPI Developments NSW Pty Limited.

3.11 Describe any existing or any proposed uses relevant to the project area

The project area has been acquired by the proponent for the purpose of industrial development, for which the project land has been rezoned for under the SEPP WSEA. Past and residual use of the project area is predominantly for market gardens, agistment and rural residential. Most of the project area has been vacated. Remaining tenants have been incrementally ceasing current usage of the land in line with ultimate vacancy.



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Section 4

Measures to avoid or reduce impacts

4.1 Describe the measures you will undertake to avoid or reduce impact from your proposed action

The proposed action will result in the removal of 2.11 ha of native vegetation.

Due to the nature of earthworks required for construction of road networks under the Precinct's Structural Plan and Draft DCP, along with providing level ground surfaces for industrial building pads, avoiding the removal of native vegetation is not possible.

It is anticipated that the proposed action will be assessed in accordance with the Bilateral agreement made under section 45 of the EPBC Act.

The BDAR for Area 2 (refer appended Aldington Estate_BDAR (ecologique, 3 June 2021) has calculated ecosystem credit obligations that will be retired to offset clearing of native vegetation to ensure a no net less eventuates as a result of the proposed action.

Area 3 contains limited native vegetation but will be the subject of a future BDAR or otherwise application for a BDAR waiver.

A flora and fauna management plan (FFMP), a weed eradication and management plan (WEMP) and dam decommissioning plan (DDP) are being prepared to support the development application(s).

The FFMP will include measures that will be undertaken to avoid harm to any native resident fauna is avoided and any fauna found during clearing activities are captured and relocated to suitable release locations. This includes preclearance surveys, demarcation of habitat features that will require a two-staged clearance process, and also identify any threatened species that may have moved into the project area since ecological surveys completed.

The WEMP will include measures that will be undertaken to ensure that all biosecurity risks (under the NSW Biosecurity Act 2015) are avoided and mitigated appropriately.

The DDM will specify how each farm dam within the project area shall be dewatered and decommissioned, including the rescue and relocation of aquatic fauna and application for relevant NSW DPI Fisheries approval for the introduction of native fin fish to identified relocation sites.

The FFMP, WEMP and DDP will be subplans to the each stage of the proposal's Construction Environmental Management Plan (CEMP). An example CEMP demonstrating how the Applicant has approached similar developments in the past is appended (5. Example CEMP Parts 1, 2 and 3).

4.2 For matters protected by the EPBC Act that may be affected by the proposed action, describe the proposed environmental outcomes to be achieved

The TEC Cumberland Plain Woodland is the only matter protected by the EPBC Act that will be impacted by the proposed action, of which 0.46 ha will be removed from Area 1 as a result of the proposed action. Removal of this vegetation will be offset under the NSW Biodiversity Offset Scheme to achieve a no net loss of the extent of this vegetation within the Cumberland Plain region.

0.7 ha of Swamp Oak Floodplain Forest and 0.33 ha of River-flat Eucalypt Forest will be retained within an E2 zoned parcel of land at the western end of Area 1.



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Section 5

Conclusion on the likelihood of significant impacts

5.1 You indicated the below ticked items to be of significant impact and therefore you consider the action to be a controlled action

- ☐ World Heritage properties
- ☐ National Heritage places
- ☐ Wetlands of international importance (declared Ramsar wetlands)
- ☐ Listed threatened species or any threatened ecological community
- ☐ Listed migratory species
- ☐ Marine environment outside Commonwealth marine areas
- ☐ Protection of the environment from actions involving Commonwealth land
- ☐ Great Barrier Reef Marine Park
- ☐ A water resource, in relation to coal seam gas development and large coal mining development
- ☐ Protection of the environment from nuclear actions
- ☐ Protection of the environment from Commonwealth actions
- ☐ Commonwealth Heritage places overseas
- ☐ Commonwealth marine areas

5.2 If no significant matters are identified, provide the key reasons why you think the proposed action is not likely to have a significant impact on a matter protected under the EPBC Act and therefore not a controlled action

Listed threatened ecological community.

The proposed action will result in the direct clearing of 0.46 ha of Cumberland Plain Woodland (CPW), which is not considered to be a significant impact.

In relation to the Commonwealth Significant Impact Guidelines (DEWHA,2013) for threatened ecological communities, the proposed action will not:

Fragment or increase fragmentation of the ecological community, as the subject patch is relatively small and separated from larger patches of the community by highly a modified pasture and introduced ground layer. A future high order road proposed under the Precinct's structure plan and Draft DCP will be constructed between the subject patch and larger more intact vegetation to the north. An estimated 40 m of the 66 m separating this patch from the larger patch will be disturbed for the construction (noting that the estimated 40 m width allows for construction disturbance either side of an approximate 28m wide proposed road.

Adversely affect habitat critical to the survival of an ecological community as the vegetation impacted by the proposed action represents a very small patch (0.46ha), which equates to a minimum and maximum of 0.004% and 0.001% (respectively) of the minimum (11,200 ha) and maximum (29,813 ha) of estimated geographic extent of the TEC in NSW. The subject patch of the community is in a poor condition, largely made up of juvenile regrowth surrounding pre-existing paddock trees with an understorey dominated by shrub and ground layer weed species. Consequently, the subject patch of the community is not considered to represent an area of critical habitat for the community.

Modify or destroy abiotic (non-living) factors (such as water, nutrients, or soil) necessary for the communities survival, such as reduction of groundwater levels, or substantial alteration of surface water drainage patterns. Changes to abiotic factors and species composition within proximal neighbouring larger patches of CPW are unlikely to occur as the community at this location is not dependent groundwater or surface water. There are no surface watercourses within Area 1 of the project area. The potential for groundwater movement in Area 2 was assessed as likely to be low by JBS&G given it is underlain by low permeability clays and shales, with groundwater flow inferred to be towards the south west/west following topography towards Kemps Creek. Given the similar elevations, gradients and historical land use between Area 1 and Area 2, it is posited that groundwater movement in Area 1 will also be similar (refer 8. Aldington Estate_Contamination appended). The decommissioning of an existing nursery within Area 1 (evident in Figure 4a) and market gardens within Areas 2 and 3 (evident in Figures 4 and 4b), will also result in the cessation of widespread use of fertilisers, herbicide and artificial irrigation, which is likely to contribute to current weed infestations within the surrounding environment.

Existing development controls and those specified within the Draft DCP require demonstration that mitigation measures will be in place or the development. These include adequate water cycle management and protection of E2 conservation zones.

Cause a substantial change in the species composition of the ecological community, including causing a decline or loss of functionally important species. The proposed action will not result in a substantial change in the quality of the adjacent community as the impact relates to clearance of a small degraded patch of CPW. The cessation of current land-use and proposed mitigation measures are anticipated to improve on existing indirect impacts on the adjacent community.



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Cause a substantial reduction in the quality or of an occurrence of an ecological community, including but not limited to: Assisting invasive species, that are harmful to the community, to become established, or cause regular mobilisation of fertilisers, herbicides or other chemicals or pollutants into the community which kill or inhibit growth of species in the ecological community. The establishment of invasive species, introduction of fertilisers, herbicides or other pollutants will be avoided through project specific subplans to the project Construction Environmental Management Plan (CEMP), which will include a Weed Eradication Management Plan and Flora and Fauna Management Plan.

Interfere with the recovery of an ecological community. The proposed action will impact on a small patch of CPW that is considered to be in low condition. The larger patches of CPW within the vicinity of the project area are zoned as E2 conservation. Potential future impacts that may result from the planned road network in Area 1 are currently beyond the control of the applicant. It is envisioned that Transport for NSW and Council will provide appropriate guidelines for the protection of this land once the proposed road network is finalised.



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Section 6

Environmental record of the person proposing to take the action

6.1 Does the person taking the action have a satisfactory record of responsible environmental management? Explain in further detail

Yes, the Applicant has developed over 300 hectares of industrial land in Western Sydney over the past ten years.

The Applicant's construction and operational activities are subject to strict adherence to SSDA/DA approved project specific Construction Environmental Management Plans (CEMPs) and Operational Environmental Management Plans (OEMPs). Project CEMPs and OEMPs are developed to ensure compliance with relevant consent and environmental monitoring conditions and include a range of supporting sub-management plans that specify measures relevant, but not limited to: biodiversity; air quality; noise and vibration; contamination; soil and erosion. An example of the Applicant's Project CEMP is appended (refer 5. Example CEMP Part 1 -App A, 5. Example CEMP Part 2 App B-E and 5. Example CEMP Part 3 App F-K).

6.2 Provide details of any past or present proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against either (a) the person proposing to take the action or, (b) if a permit has been applied for in relation to the action – the person making the application

The Applicant has not been the subject of any environmental management proceedings, although at the time of completing this application a Show Cause Notice Ref INC14227 with AWE has been issued. Further details regarding this matter at the time of assessment can be reviewed internally by AWE. Refer to Section 6.1 for information of Show Cause Notice Ref INC14227.

6.3 If it is a corporation undertaking the action will the action be taken in accordance with the corporation's environmental policy and framework?

☒ Yes ☐ No

6.3.1 If the person taking the action is a corporation, provide details of the corporation's environmental policy and planning framework

Refer appended 6. Frasers HSE Policy.

6.4 Has the person taking the action previously referred an action under the EPBC Act, or been responsible for undertaking an action referred under the EPBC Act?

☒ Yes ☐ No

6.4.1 EPBC Act No and/or Name of Proposal

2021/8926 Kemps Creek Warehouse, Logistics and Industrial Facilities Hub
2015/7531 Australand Industrial No.139 Commercial Development Yatala/Qld
2006/2817 Australand Holdings Ltd Commercial Development Eastern Creek Wonderland Business Park Stage 2
2004/1627 Australand Holdings Ltd Urban and Commercial new Development Eastern Creek Wonderland Business Park Lot 1B
2004/1626 Paul Solomon Commercial Development Eastern Creek Wonderland Business Park Precinct Stage 1, Lot D1
2004/1445 Australand Holdings Ltd Urban and Commercial new Development Eastern Creek Clearance of 6.3 ha of Cumberland Plain Woodland for industrial subdivision cnr of Old Walgrove and Walgrove Roads



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Section 7

Information sources

Reference source

Biosis, 2019. EPBC Act Threatened Ecological Communities Mapping for the Cumberland Plain Assessment Report for Strategic Biodiversity Certification Assessment Report of the Western Sydney Strategic Assessment.

Reliability

Good

Uncertainties

Nil

Reference source

Biosis, 2018. Vegetation communities mapping for the Cumberland Plain Assessment Report for Strategic Biodiversity Certification Assessment Report of the Western Sydney Strategic Assessment.

Reliability

Moderate

Uncertainties

Areas of vegetation community mapping within Area 1 and adjacent neighbouring land to the west were indicated as CPW. This was found not to be the case during floristic surveys undertaken for Area 1.

Areas within the E2 zoned land in the western end of Area 1 were determined to contain Swamp Oak Floodplain Forest and River-flat Eucalypt Forest and not CPW (refer appended Aldington Estate_Figure 4 PCTs impacted.pdf).

These findings do not impact on this referral however, as the E2 conservation zone is not being impacted by the proposed action, and DNG does not meet the diagnostic and condition thresholds for consideration as an MNES.

Reference source

Department of Agriculture, Water and Environment (DAWE). 2010. Cumberland Plain Shale Woodlands and Shale-Gravel Transition Forest. A guide to identifying and protecting the nationally threatened ecological community Environment Protection and Biodiversity Conservation Act 1999 Policy Statement 3.31

Reliability

Good

Uncertainties

Nil

Reference source

Department of Agriculture, Water and Environment (DAWE). 2020a. Conservation Advice for the River-flat eucalypt forest on coastal floodplains of southern New South Wales and eastern Victoria.

Reliability

Good

Uncertainties

Nil

Reference source

Commonwealth of Australia. 2013. Matters of National Environmental Significance Significant impact guidelines 1.1 Environment Protection and Biodiversity Conservation Act 1999

Reliability

Good



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Uncertainties

Nil

Reference source

NSW Department of Planning, Industry and Environment (August 2020) Draft Cumberland Plain Conservation Plan 2020–56

Reliability

Moderate

Uncertainties

Draft proposed zoning of future Strategic Conservation Areas (SCAs) hasn't taken into consideration the future impacts of proposed road and freight networks. The Draft Precinct DCP appears to largely base biodiversity conservation objectives and controls as reported in the Draft CPCP. Until both instruments are finalised and adopted there are a number of uncertainties as to how the project land within Area 1 will be affected. Further the proposed road and dedicated freight network will undermine the Draft CPCP's objective of providing an ecological link between South Creek and Ropes Creek (from west to northeast).

As this is beyond the control of the Applicant, this referral is based on what is currently proposed (i.e., the removal of 0.46 ha of CPW from Area 1) and a determination of whether this is deemed a controlled action.



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Section 8
Proposed alternatives
Do you have any feasible alternatives to taking the proposed action? Yes <input checked="" type="checkbox"/> No



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Section 9

Person proposing the action

9.1.1 Is the person proposing the action an organisation or business?

☒ Yes ☐ No

Organisation

Organisation name (as registered for ABN/ACN)	FPI DEVELOPMENTS NSW PTY LIMITED
Business name	
ABN	89648326676
ACN	
Business address	Level 2, 1C Homebush Bay Drive, Rhodes, 2138, NSW, Australia
Postal address	
Main Phone number	133838
Fax	
Primary email address	contactcentre@frasersproperty.com.au
Secondary email address	

9.1.2 I qualify for exemption from fees under Regulation 5.23(1)(ii) of the EPBC Regulations because I am:

☐ Small business
☒ Not applicable

9.1.2.2 I would like to apply for a waiver of full or partial fees under Regulation 5.21A of the EPBC Regulations

☐ Yes ☒ No

9.1.3 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)

First name	Paul
Last name	Solomon
Job title	Planning and Infrastructure Manager
Phone	61 2 9767 2951
Mobile	61 417 480 730
Fax	
Email	Paul.Solomon@frasersproperty.com.au
Primary address	Level 2, 1C Homebush Bay Drive, Rhodes, 2138, NSW, Australia
Address	

Declaration: Person proposing the action (To be signed by the person at 9.1.3)

I, Paul Solomon, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity.

Signature: Paul Solomon Date: 05/07/2021

I, Paul Solomon, the person proposing the action, consent to the designation of FPI DEVELOPMENTS NSW PTY LTD as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature: Paul Solomon Date: 05/07/2021



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Proposed designated proponent

9.2.1 Is the proposed designated proponent an organisation or business?

☐ Yes ☒ No

9.2.2 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)

First name	Paul
Last name	Solomon
Job title	Planning and Infrastructure Manager
Phone	61 2 9767 2951
Mobile	61 417 480 730
Fax	
Email	Paul.Solomon@frasersproperty.com.au
Primary address	Level 2, 1C Homebush Bay Drive, Balgowlah, 2093, NSW, Australia
Address	

Declaration: Proposed Designated Proponent

I, Paul Solomon, the
proposed designated proponent, consent to the designation of
myself as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  Date: 05/07/2021



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Referring party (person preparing the information)**9.3.1 Is the referring party an organisation or a business?**

☒ Yes ☐ No

Organisation**Organisation name (as registered for ABN/ACN)**

KATHRYN DUCHATEL

Business name**ABN**

12043047145

ACN**Business address**

12 Wanganella St, Balgowlah, 2093, NSW, Australia

Postal address

0437821110

Main Phone number**Fax**

kat@ecologique.com.au

Primary email address**Secondary email address****9.3.2 Contact (for an organisation - the contact details of the person authorised to sign on behalf of the organisation)****First name**

Kat

Last name

Duchatel

Job title

Principal

Phone

0437821110

Mobile**Fax****Email**

kat@ecologique.com.au

Primary address

12 Wanganella St, Balgowlah, 2093, NSW, Australia

Address**Declaration: Referring party (person preparing the information)**

I, Kat Duchatel, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence.

Signature: K. Duchatel Date: 05.07.2021



Note: PDF may contain fields not relevant to your application. These fields will appear blank or unticked. Please disregard these fields.

Appendix A	
Attachment	
Document Type	File Name
action_area_images	Figure 1. Location plan.pdf
action_area_images	Figure 2. Extent of action.pdf
action_area_images	Subject_land_vegetation.shp
action_area_images	E2_zones.shp
action_area_images	Proposed_action.shp
public_consultation_reports	1. Aldington Estate_ACHA.pdf
public_consultation_reports	2. Aldington Estate_Heritage.pdf
supporting_tech_reports	3. Aldington Estate_BDAR.pdf
supporting_tech_reports	4. Aldington Estate_EPBC Assessment.pdf
supporting_tech_reports	Figure 3 CPCP zoning.pdf
supporting_tech_reports	Figure 4 PCTs impacted.pdf
supporting_tech_reports	Figure 5 GGBF surveys.pdf
supporting_tech_reports	Figure 4a TECs impacted.pdf
supporting_tech_reports	Figure 4b Project area vegetation.pdf
impact_reduction_docs	5. Example CEMP Part 1 -App A.pdf
impact_reduction_docs	5. Example CEMP Part 2 App B-E.pdf
impact_reduction_docs	5. Example CEMP Part 3 App F-K.pdf
impact_reduction_docs	7. Aldington Estate_RAP.pdf
impact_reduction_docs	8. Aldington Estate_Contamination.pdf
corp_env_policy_docs	6. Frasers HSE Policy.pdf

Appendix B
Coordinates
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