

# EPBC Act referral



Australian Government

Department of Agriculture, Water and the Environment

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<b>Title of proposal</b>	<b>2022/9154 - Flat Rocks Wind Farm</b>
<b>Section 1</b>	
<b>Summary of your proposed action</b>	
<b>1.1 Project industry type</b>	Energy Generation and Supply (renewable)
<b>1.2 Provide a detailed description of the proposed action, including all proposed activities</b>	
<p>FRWF Stage 1 Pty Ltd (FRWF 1) (the Proponent) proposes to develop, construct, and operate the Flat Rocks wind farm (FRWF), a renewable energy generation facility located on predominately cleared agricultural land in the Flat Rocks locality in the Great Southern Region of Western Australia. The project area runs approximately 20km north to south from the Kojonup Broomehill Road to the Tambellup West Road, covering a total area of approximately 6, 840 Ha as shown below in Section 1.3. Once constructed and fully operational, the Flat Rock wind farm facility will occupy around 6.1 Ha of land area the majority of which is historically cleared agricultural land. Broadacre cropping and livestock production are the current land use within and surrounding the development site, a land use that has been in place for many decades.</p> <p>The purpose of this submission is assessment of the construction and operation of the proposed action in the southern area of the Flat Rocks wind farm development site. This will see 18 x V150 4.2MW wind turbines with a tip height of 200m installed in cleared open agricultural land currently utilised for broadacre cropping and livestock production. As described in Att 1 – Mattiske 2022, the proposed action occurs in a highly modified environment as a result of many decades of broadacre agriculture which sees much of the project area classified as degraded to completely degraded, Map 5 page 21, Att 1 Mattiske 2022. As a result, much of the original vegetation has been cleared with small areas of remaining remnant vegetation, Figure 3 Vegetation Map page 19, Att 1 Mattiske 2022, which still offers habitat for some flora and fauna species.</p> <p>Careful considerations have been taken to ensure the final design of the proposed action minimises the impact to environment, surrounding community, cultural heritage and existing land users. Wind turbine locations were selected after 7 years on onsite wind monitoring in conjunction with the topography of the land. Access to site during construction and for ongoing operations will predominately be via existing local roads and tracks. All electrical cables within the windfarm will be underground and avoid remnant vegetation where practicable with WTG and cable routes located predominately in cleared agricultural paddocks. Each turbine site will have a foundation footprint and crane laydown area of 0.2099 Ha equating to approximately 3.778 Ha for total 18 sites. Temporary laydown areas for wind turbine installation, tower and blade laydowns will total 4.57 Ha. A temporary laydown area of 2.08 Ha will also be required to host the concrete batching plant, crane and turbine service areas. Finally, a total area of 0.634 Ha will be required for the installation of permanent maintenance and electrical substation at the point of grid connection. This referral is to assess the impact of the southern section of the project which will consist of;</p> <ul style="list-style-type: none"> <li>• 18 x V150 4.2MW wind turbine generators (Tip height 200m, Hub height 125m, 75m blades) and adjacent gravel hardstand area to provide a safe working area for cranes during construction and operations.</li> <li>• Each wind turbine will have a reinforced underground concrete foundation,</li> <li>• On site tracks to allow delivery of wind farm components and access for ongoing maintenance,</li> <li>• An electrical substation located adjacent to the existing high voltage 132 kV power line, medium-voltage (33 kV) underground powerlines, 20m high voltage (132kV) overhead powerline to link into existing 132kV powerline,</li> <li>• Combination of temporary and permanent 125m wind monitoring mast,</li> <li>• Operations and maintenance building, temporary construction laydown areas, compounds, stockpile areas and mobile concrete batching plant, temporary and permanent site entrance</li> <li>• Operations compound - temporary site offices, workshops, warehouses and amenities</li> </ul> <p>Clearing of native vegetation will be avoided unless practically unsafe to do so. All project works will avoid remnant vegetation and there will be no impact to waterways. All works during construction and operation will have an insignificant or no impact to MNES, including the potential for 3 Cockatoo species; Carnaby's Black Cockatoo (<i>Calyptorhynchus latirostris</i>), Forrest Red-Tailed Black Cockatoo (<i>Calyptorhynchus banksii naso</i>) and Baudin Black Cockatoo (<i>Calyptorhynchus baudinii</i>). Several single paddock trees, upto 9, which are showing signs of decline (stressed foliage) (see Mattiske 2022 Appendices G and H) and potentially located in the direct vicinity of the wind turbines sites will be cleared to ensure safe construction and operations of the facility. All trees identified for removal were assessed by a senior biologist who visited the project area in December 2021, and all trees were observed to be in poor health and provided no evidence of nesting or habitat due to isolated location and poor health. These isolated paddock trees did not have hollows suitable for the Black Cockatoos.</p> <p>The proposed action will have minimal direct and indirect impact on the environment as the proposed action will occur predominantly in cleared and degraded agricultural land, see Att 1 – Mattiske 2022, Figure 3, page 19 VEGETATION and Figure 5 page 21 VEGETATION CONDITION, while utilising existing farm tracks and public roads where possible. The installation and operation of the wind turbines will see the greatest impact on the project area with the requirement to remove upto 9 single paddock trees. The laying of cable and new access tracks may have an impact on the surrounding environment where they need to cross road reserves and fence lines. When selecting the design of these two components of the proposed action, all efforts have been made to utilise existing gateways and minimise the need for any additional clearing of existing vegetation. All potential clearing requirements in this case were assessed by a senior biologist in December 2021 and fence line vegetation was typical of agricultural use, degraded and of little environmental value. The impacts of the proposed action</p>	



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on the surrounding environment are presented in Att 1 – Matiske 2022 (Table 3 pages 24 and 25).

**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)**

The Flat Rocks wind farm facility is located in the Great Southern Region of Western Australia, one of the nine regions defined by the Regional Development Commissions Act 1993, for the purposes of economic development. It is located in the South Coast of Western Australia in the center of the southern agricultural region. The economy of the Region is dominated by broadacre cropping and livestock farming, meat, wool and dairy. Located 280km south of Perth, the Flat Rocks wind farm site is 20km south east of Kojonup, 27 north west of Tambellup 27km south east, 16 km west of Broomehill and 27km south west of Katanning. The development land is secured under long term lease agreements has historically been used for broadacre cropping and livestock production, and the area identified for the installation of the wind farm components is predominately cleared and degraded agricultural land. The project is located in the Shires of Kojonup and Broomehill Tambellup.

**1.6 What is the size of the proposed action area development footprint (or work area) including disturbance footprint and avoidance footprint (if relevant)?**

The combined area assessed in this referral and approved under development approvals from the Shire Kojonup and Southern Joint Assessment Panel (JDAP) via Shire of BH-TA is 6,840 hectares. The proposed action area runs approximately 20km north to south from the Kojonup Broomehill Road to the Tambellup West Road, covering the area shown in Section 1.3. Once constructed and fully operational, the Flat Rock wind farm facility will occupy around 6.1 Ha of land area the majority of which is historically cleared agricultural land. Broadacre cropping and livestock production are the current land uses within and surrounding the development site, a land use that has been in place for many, many decades and resulted in much of the area classified and degraded or very degraded, Figure 5, page 21, Att 1 – Matiske 2022. Appendix G, page 76-93 Att 1 - Matiske 2022, shows the location of the major component, the wind turbines, in cleared agricultural paddocks and their minimal impact.

**1.7 Proposed action location**

Address - Tambellup West Road, Lot 5315, Lumeah, WA, 6395, Australia

**1.8 Primary jurisdiction**

Western Australia

**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 13/07/2022

End Date 01/10/2054

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

WA State Government:

The proposed action has been assessed and granted development approval by the Shire of Kojonup, under Town Planning Scheme No.3, and the Joint Development Assessment Panel in conjunction with the Shire of Broomehill-Tambellup according to the Shire of Broomehill Town Planning Scheme No.1 and Shire of Tambellup Town Planning Scheme No.2. The proposal



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development application and accompanying Environmental Impact Assessment Report was assessed in 2010/2011 against the WA Planning Bulletin No 67 – Guidelines for Wind Farm Development. In 2021 the proposal was reassessed against the updated WA Planning Position Statement - Renewable energy facilities, when a DA amendment was submitted, along with updated impact reports, to the Shire of Kojonup and the JDAP to accommodate the installation of the most modern wind turbine model suitable to the project, Vestas V150 4.2MW wind turbine.

A final review of the proposed action was undertaken by the WA EPA following referral according to 39 (A) Environmental Protection Act 1983. The EPA concluded, following review of the Environmental Impact Assessment Report and appendices, see Att 8 – Environmental Impact Study, that the proposed action was deemed to be NOT ASSESSED and No Advice Given. This clearly demonstrates that the proposed action will have minimal or no impact to the surrounding environment as it is predominately located in degraded, cleared agricultural land. The list below shows the various approvals granted following review of environmental impact reports and the 2021 updated reports summarised in Att 9 - Flat Rocks Wind Farm DA Amendment Report 2021.

List of assessments and approvals for the proposed action;

1. Submitted Planning Application and Environmental Impact Report Flat Rocks wind farm to Shire of Kojonup (DB. BDA.8) – November 2010
2. EPA Determination – Minimal environmental impact deemed No Assessment and no advice given – April 2011
3. Unanimous approval of the Flat Rocks wind farm project development application from Kojonup Council - November 2011
4. Submitted Planning Application and Environmental Impact Report Flat Rocks wind farm to Shire of Broomehill-Tambellup (ref: DP 12/01359) - November 2012
5. Application referred for assessment by Great Southern Joint Development Assessment Panel (GSJDAP) following changes to the Planning and Development Regulations 2011, DAP Regulations – December 2012
6. Airservices Australia updated the approach procedures for Katanning Aerodrome to accommodate WTG model and tip height increase – June 2013
7. GSJDAP approved the amended development application of the project in the Shire of Broomehill-Tambellup - July 2013
8. 4-year extension to planning approval Shire of Kojonup – September 2015
9. Approved DA Map amendment, approval of missed LOTS, Shire Kojonup – July 2016
10. DA amendment approved, update WTG to V126-3.4MW and harmonized DA conditions, Shire of Kojonup – December 2016
11. DA amendment approved, update WTG to V126-3.4MW and harmonized DA conditions GSJDAP – May 2017
12. DA amendment approved, update 42 V150 4.2MW Shire of Kojonup – September 2021
13. DA amendment approved, update 42V150 4.2MW JDAP – December 2021

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

Moonies Hill Energy Pty Ltd (MHE) has consulted with neighbours, community groups, a range of government departments and agencies during the development of the FRWF project. Information sessions with neighbours were undertaken in the early phase of the development between 6 August 2008 and later for the broader community 17 September 2010 in the Kojonup Hall. Participants were invited to attend if they owned land and resided within 10km of the proposed action development site. A further two community information sessions, open to members of the broader community, were held 16 May 2011. A summary of the consultation process is available in the Flat Rocks Wind Farm Stakeholder Report, Att -10 FRWF Stakeholder Report. In late 2021 as the project nears construction, a further consultation process was undertaken to reassess neighbour and community engagement and provide a broader understanding of the social, environmental and economic opportunities and impacts of the project via a SEECA (Social, Environmental, Economic Context Analysis) process.

In August 2010, R & E O'Connor undertook an ethnographic and archeological survey of the FRWF development area, Att 11 - Ethnographic Survey, Att 12 - Archeological Survey. The survey considered a review of the ethnographic database relevant to the development area of the proposed action and the Department of Indigenous Affairs Site Files in conjunction with a field inspection of the by a representative of the Wagyl Kaip and Southern Noongar native title claimant groups in association with members of the Kojonup Aboriginal Progress Association. The results of the survey found there to be no known sacred or significant Aboriginal sites within the proposed action development area and no archeological sites were identified.

#### **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**

Local Government assessed environmental impact reports and associated studies in considering development approvals and amendments, Att 8 - Environmental Impact Report, Att 13- Development application 2021. Reports contain a summary of assessments and impacts for the referred proposed action project. These reports were also referred to the WA EPA. Additionally, discussions were held with specialist botanists, zoologists and Cockatoo experts who stated the proposal impact



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should be minimal and insignificant to environmental values due to its located on cleared and degraded agricultural land. Studies found, threats from existing agricultural activities far surpass any short term or ongoing management issues associated with the proposal. Previously windfarms in WA have been approved with no controlled or minimal actions and as such this proposed wind farm has minimal or no impact on environmental impacts. Careful project design avoids direct and indirect impacts to existing environment.

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

☐ Yes      ☒ No

**1.16 Is the proposed action related to other actions or proposals in the region?**

☐ Yes      ☒ No



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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

Carnaby's Black Cockatoo (*Calyptrorhynchus latirostris*), Forrest Red-Tailed Black Cockatoo (*Calyptrorhynchus banksii naso*), Baudin Black Cockatoo (*Calyptrorhynchus baudinii*)

### Impact

The proposed action of constructing and operating the Flat Rocks wind farm has the potential to impact the Black Cockatoos (Att 1 - Mattiske 2022 – Section 5.6 Page 18). The cockatoo specialists consulted in regard to this referral, indicated that the project area was mostly used by the Carnaby's Black Cockatoo (*Calyptrorhynchus latirostris*); although it did occur on the fringes of the other Cockatoos the Forrest Red-Tailed Black Cockatoo (*Calyptrorhynchus banksii naso*) and Baudin Black Cockatoo (*Calyptrorhynchus baudinii*). The Forrest Red-tailed Black Cockatoo was recently observed flying through the area. It should be noted that the Cockatoo specialists considered that the risk of the Cockatoos flying into the wind turbines was very low.

The potential risk of impacts to these species is minimized by the degree of clearing and degraded vegetation in the project area as a result of many decades of agricultural activities (Figure 5, page 21, Att 1 Mattiske 2022). Final design of the project components and in particular the laydown and crane stand areas have largely avoid remnant vegetation areas and instead utilise the cleared broadacre paddocks. A total of upto 9 isolated paddock trees may require removal depending on the final orientation of the laydown areas. The identified single trees are generally declining in condition and have some small hollows, that are not suitable for the Black Cockatoo nesting. FRWF contracted Mattiske Consulting to assess the value of the paddock trees identified for removal after final project design of wind turbine, crane hardstand and components laydown area (see photographs in Mattiske 2022 Appendices G and H). All trees identified were assessed by a senior biologist in December 2021 and were observed to be of low value, due to isolation and their declining condition.

All project works will avoid remnant vegetation and there will be no impact to waterways.

All works during construction and operation will have an insignificant or no impact to MNES.

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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<b>2.7 Is the proposed action likely to be taken on or near Commonwealth land?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.8 Is the proposed action taking place in the Great Barrier Reef Marine Park?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>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?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.10 Is the proposed action a nuclear action?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.11 Is the proposed action to be taken by a Commonwealth agency?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>2.12 Is the proposed action to be undertaken in a Commonwealth Heritage place overseas?</b> <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>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?</b> <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

The flora and fauna relevant to the project area are described in the Flora, Vegetation and Fauna Report prepared by Mattiske 2022, Section 5 pages 12-21, Att 1 - Mattiske 2022. The Flat Rocks Wind Farm project area is located within the Southern Jarrah Forest subregion within 5km of the border of the Avon Wheatbelt region. The Southern Jarrah Forest subregion is characterised by jarrah forest on duricrust plateaus and loam soils of valleys, with marri-wandoo woodlands on laterite-free soils (Beard, J.S. 1990, Plant Life of Western Australia. Kangaroo Press, Kenthurst NSW). Typical vegetation of the Avon Wheatbelt region includes scrub-heath on sandplains, Acacia-Casuarina thickets on ironstone gravels, woodlands of Eucalyptus loxophleba, Eucalyptus salmonophloia and Eucalyptus wandoo on varying soil types.

Mattiske Consulting Pty Ltd was commissioned by the Moonies Hill Energy to undertake a review of the flora, vegetation, and fauna values within the Flat Rocks Wind Farm project area in 2016 and January 2022 following additional targeted survey work on 8th December 2021. This updated assessment was due to the updated design of the wind farm facilities in January 2022. Observations were undertaken on the condition of the fauna habitats and remnants. Discussions were held with Jen Wilcox from Western Wildlife who undertook a bird survey in December 2021. Additionally, Tony Kirkby was consulted as a Cockatoo specialist in regard to impact.

The project area occurs primarily within cleared and degraded agricultural areas, Figure 1, page 6, Att 1 – Mattiske 2022. A total of 24 threatened and priority flora have been listed as occurring, or potentially occurring, in the vicinity of the Flat Rocks Wind Farm (Department of Parks and Wildlife 2007). A summary of these species' listings at State and Federal levels can be found in Appendix B, Att 1 - Mattiske 2022.

A total of 26 protected fauna species have been listed as occurring, or potentially occurring, in the vicinity of the Flat Rocks Wind Farm, including 14 birds and 12 mammals (Department of Agriculture, Water and the Environment 2021e). A summary of protected fauna listings pursuant to subsection (2) of section 23F of the Biodiversity Conservation Act 2016, the Environment Protection and Biodiversity Conservation Act 1999 and the International Union for Conservation of Nature and Natural Resources' Red List, is presented in Appendix C, Att 1 - Mattiske 2022. Ardeotis Australis (Australian Bustard) and Burhinus grallarius (Bush Stone-Curlew), as described in the 2010 Mattiske report Mattiske Consulting Pty Ltd 2010, Att 14 - Mattiske 2010, are no longer listed fauna species.

The interpretation of the potential likelihood of the respective species on the proposed infrastructure facilities which as indicated on Figure 1 above and from a review of the photographs of the proposed sites and access routes in.

Appendix G, Att 1 - Mattiske 2022, shows that the location of the majority of the wind farm components, including all wind turbines, is predominately in cleared and degraded farmland, the potential for impacts on any listed species will be insignificant. This combined with the fact that whilst a few of the species may forage or pass through the proposed area, it is expected that due to the heights of the wind towers and avoidance of remnants, and the dominance of degraded paddocks that have been grazed and cropped for many decades, any impacts will be minimal or insignificant.

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

The proposed facility does not occur in wetlands or creek lines and there will be no direct or indirect impacts associated with construction or ongoing operations and maintenance of the FRWF facility. The proposed action is located within the Gordon River Catchment system. Att 8 - Environmental Impact Report, section 3.3 page 12, provides a summary of the hydrology within the proposed action development area. It states that although there are a number of defined drainage lines and gullies in the project area, there are no permanent watercourses. The largest of these drainage lines and gullies tend to carry surface flow for several months after winter rain and may form permanent pools over the summer and warmer months. The porous soils and low slopes of the project area mean that runoff would occur only during and shortly after an intense rainfall event. There are some minor areas of salt scalding and saline seepage within the project area but the area is largely free of salinity, probably due in part to its elevation.

The project will not have any significant effect on drainage or groundwater recharge. Section 2.8, page 11, of Att 8 - Environmental Impact Report, provides commentary on the drainage requirements for the proposed action and that they will be minimal as the majority of the project area consists of gentle sloping terrain. The report states that all access roads will be graded so in the event of rain, water runs off to the side of the track and should these tracks cross drainage lines, culverts or floodways will be installed to maintain the existing drainage flow.

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

The soil values in the project area have been highly modified by the historical and current agricultural activities. Section 3.3, page 7 of Att 12 - Archaeologic Survey, states the soils within the survey area consist of lateritic gravelly sandy loams or sandy loams produced by granite and gneissic bedrocks.

Vegetation characteristics relevant to the project area are describes in Att 1 - Mattiske 2022, section 5.3 page 17. The report describes the quality of the vegetation within the project area as very disturbed having been largely grazed or cleared for agriculture (Figure 3, page 21). This report clearly illustrates in Figure 5 page 23, that the majority of the survey area and in particular the proposed infrastructure areas, are completely degraded or degraded.



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

None present. The project is located in largely degraded to very degraded cleared agricultural paddocks.

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

The status of native vegetation relevant to the project area are described in the environmental report prepared by Mattiske 2022, Att 1- Mattiske 2022, Section 5.5, page 18 and in Figure 5, page 23. The report notes that the plant communities within the proposed action area are very disturbed and have been largely grazed or cleared due to agriculture land use for many decades. The report in Figure 5, page 23, Att 1- Mattiske 2022, illustrates the condition of native vegetation and shows it to be degraded along creek lines and completely degraded in approximately 90% of the proposed action area identified as cleared agricultural products.

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

MHE commissioned an Aviation Impact Statement (AIS) by Aviation Projects in 2021, to review the impact of the proposed action on the Katanning Aerodrome. The report documented that the highest elevation for the proposed action to be 582m Australian Height Datum (AHD) with the tip height of the V150 4.2MW selected for the project 200m above ground. It is noted that this height breaches the current MSA, minimum safe altitude, for approaches to the Katanning Aerodrome which will be requested to be updated by Air Services Australia prior to commencements of construction. MHE has undertaken this process previously with an earlier turbine model.

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

The project area is located within highly modified broad acre agriculture land used for cropping, pasture and livestock production. The latter is apparent from the aerial imagery in Figure 1, page 2 of the Mattiske 2022 report, Att 1- Mattiske 2022. Further, the environment for the proposed action is described in section 5.5, page 18 of the Mattiske 2022 report, Att 1- Mattiske 2022, and clearly illustrated in the photographs in Appendix G, page 61 of the Mattiske report, Att 1- Mattiske 2022. The environment is described as degraded to completely degraded with only small patches of remnant vegetation scattered on the fringes and outside the proposed action areas for the wind farm facilities as shown in Figure 5, page 21 of Mattiske 2022, Att 1- Mattiske 2022, and discussed in Section 5.5, page 18, Mattiske 2022, Att 1- Mattiske 2022.

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

The project area has no recognised places by the Commonwealth Heritage or places having heritage values as shown by database and site surveys undertaken by R&E O'Connor in conjunction with John, B, Cecchi, in 2010. The respective reports are titled; Report on an Ethnographic Survey of the Proposed Flat Rocks Windfarm Site between Kojonup and Broomehill prepared by R&E O'Connor, Att 11 - Ethnographic Survey, and Report on an Archaeological Survey of the Proposed Flat Rocks Wind Farm WA by John, B, Cecchi, Att 12 - Archaeologic Survey, attached to this submission.

**3.9 Describe any Indigenous heritage values relevant to the project area**

No items or places of any Indigenous heritage value have been identified in the project area as reported in the Report on an Ethnographic Survey of the Proposed Flat Rocks Windfarm Site between Kojonup and Broomehill prepared by R&E O'Connor, Att 11 - Ethnographic Survey, and Report on an Archaeological Survey of the Proposed Flat Rocks Wind Farm WA by John, B, Cecchi, Att 12 - Archaeologic Survey.

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

All land located with the development area of the FRWF project is freehold land and secured by the project company under a Licence and Lease arrangement. Prior to the commencement of construction of the development in July 2022, existing licences will be converted by the execution of draft lease agreements to long term lease of 30 years, with an option to extend for an additional 20 years should the project life extend beyond the current 30 year design life. All leases have been assessed by the WA Planning Commission.

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

The land contained within the project area is centrally located within the Great Southern Region of Western Australia, an area dominated by broadacre cropping and livestock production. Over the last 100 years the region has grown to become a significant part of the States Gross Regional Product (GRP) accounting for 13% of overall agriculture output of Western Australia. The main agricultural industries include cropping, livestock and wool production, with horticulture and viticulture also important contributors to this sector in the Region.

Land within the project area is well regarded for its grain and livestock production due to the reliable rainfall, productive soils and undulating land. Changes to the rainfall totals and timing over recent decades due to climate change, have seen a reduction in traditional livestock numbers in favour of less water intensive broadacre cropping. The general landscape within the development area as a consequence of past and current land use activities, consists of predominately cleared open





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paddocks with sections of remnant bush typically located along creek and fence lines with scattered single paddock trees which are often in poor health.

Wind farm developments are highly compatible with broad acre agriculture due to their small footprint once operational.



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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 components of the Flat Rocks wind farm will have a low impact on the surrounding land and environment as the majority of components will be located in cleared and degraded agricultural land subject to annual cropping and livestock production, see Appendices F and G of Mattiske 2022, Att 1- Mattiske 2022. During the design phase, project proponents have avoided areas of remnant vegetation and been respectful of all TEC buffers. Dedicated access tracks for wind farm maintenance and delivery of components during construction, have been designed in consultation with land owners to reduce impacts to current land use activities and the environment. Upgrades to existing tracks and local roads have been utilised where possible. New track and cable routes have avoided remnant vegetation where possible and where this is not possible, gaps in the vegetation or gateways have been selected to minimise impact. In the project area, as is common in land cleared for agricultural activities, there are examples of single paddock trees. Such trees in the vicinity of wind turbine locations were assessed by a biologist in December 2021 for nesting and breeding activity. No evidence of such activity was observed in any single paddock trees in close proximity to the proposed project infrastructure, further demonstrating the low impact of the proposed action in this location. The majority of the paddock trees were reported to be in poor health and unlikely to survive in the longer term, as illustrated in photographs documented in Appendix G of Mattiske 2022, Att 1- Mattiske 2022.

#### 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 proposed outcome for the three Black Cockatoo species noted in section 2.4 and identified by a PMST search of the DAWE 2021 databases, (The MNES values are addressed in Section 5.6 (Page 18) and Table 3 (pp 26-27) of Mattiske 2022, Att 1 - Mattiske 2022) is that their environment and habitat will not be significantly impacted directly or indirectly by the proposed action.

As the remnant vegetation areas remain untouched by the proposed action and that Cockatoo experts have indicated the proposed action will not affect the fly through activity of the Cockatoos as they move into the area for feeding or between breeding areas. Typically these birds fly between areas of remnant vegetation and will actively avoid wind turbines as they have excellent vision and are not known to fly at the sweep area height of the proposed turbines.

The actions noted above combined with the WA EPA determination, Att 4- EPA determination, indicates that the project does not warrant a decision to have a controlled action imposed on this project and the impact of the proposed action will be insignificant.



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## 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

The referral and impact assessments included with this referral, have identified some potential for MNES species and communities to exist in the project area. However as indicated in the Mattiske 2022 Report, and as clearly evident from Figure 1 and Appendix 5 (Photos of proposed sites), page A5, Att 1 - Mattiske 2022, the potential impacts from the proposed action are insignificant. The proposed action should therefore not be considered as requiring a decision to have controlled actions imposed. In relation to the potential threatened ecological communities, there are errors in the determination of boundaries as specified in the Federal database – as planted trees along fence lines of non-native trees have been highlighted, while not all areas of woodland areas south of the proposed actions, have been highlighted, reflecting again the errors in this database. As the proposed actions avoid the stands of Eucalypt woodlands, although highlighted as potential, these matters are not directly impacted by the proposed actions which occur predominately on the cleared and degraded farmlands.

The combination of the avoidance and mitigation measures proposed in Mattiske 2022, Att 1 - Mattiske 2022, page 28, and the location of the wind farm components in areas currently used for broadacre production of crops, pasture and livestock classified as cleared and degraded, the proposed action is not considered to have a significant impact on the MNES and therefore should not be considered as requiring a decision to have controlled actions imposed.

As the proposed action will be undertaken on largely cleared land currently used for broadacre cropping and livestock production, the Flat Rocks wind farm proposal will have minimal impact on the surroundings and matters protected under the EPBC Act. The proposed action has been assessed by the State Environmental Protection Agency and deemed to Not Be Assessed - No Advice Given, or have any controlled actions applied to the proposal, Att 13 - EPA Determination.

In addition to the impacts on flora and fauna, and in line with State and Federal planning guidelines, MHE has assessed the environmental impact of the proposed action in terms of noise impact, shadow and blade flicker, zone of visual influence, airspace assessment and electromagnetic impact assessment to the surrounding area to the proposed action. All studies have shown the proposed action to comply with current and past guidelines. Copies of the various impact reports are available upon request and have formed the basis of Local and State Government assessments mentioned in this submission, ie DA approvals and EPA assessment.



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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 project proponents and JV partners have a satisfactory record. FRWF Stage 1 Pty Ltd is a special purpose vehicle established specifically to build, own and operate the Flat Rocks wind farm facility. MHE has developed the wind farm in accordance with all State and Federal regulations and together with project equity partner Enel Green Power (EGP), will ensure industry best practice measures are adhered to during all stages of the project in regards to avoiding and managing potential environmental impacts identified, and adhering to development approval conditions. EGP has a strong record globally in constructing and operating some 49GW of renewable energy plants in an environmentally sustainable and responsible way, a key reason for the selection of EGP by MHE from a global search for a project partner.

#### 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

Neither FRWF Stage 1 or MHE have past or present proceedings under a Commonwealth, State or territory law for the protection of the environment or any other matter.

#### 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

#### 6.4 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



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

<b>Section 7</b>
<b>Information sources</b>
<b>Reference source</b> Department of Agriculture, Water and the Environment 2021a,b,c,d,e,f,g,h,i,j Environment Protection and Biodiversity Conservation Act 1999 List of Threatened Flora. < <a href="http://www.environment.gov.au/">http://www.environment.gov.au/</a>
<b>Reliability</b> High
<b>Uncertainties</b> Low
<b>Reference source</b> Department of Parks and Wildlife 2007-, NatureMap, Mapping Western Australia's Biodiversity. < <a href="http://naturemap.dpaw.wa.gov.au/">http://naturemap.dpaw.wa.gov.au/</a> >
<b>Reliability</b> High
<b>Uncertainties</b> Low
<b>Reference source</b> Department of Primary Industries and Regional Development 2021, Western Australian Organism List. Available from: <a href="https://www.agric.wa.gov.au/organisms">https://www.agric.wa.gov.au/organisms</a>
<b>Reliability</b> High
<b>Uncertainties</b> Low



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<b>Section 8</b>
<b>Proposed alternatives</b>
<b>Do you have any feasible alternatives to taking the proposed action?</b> 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)	Moonies Hill Energy Pty Ltd
Business name	
ABN	76131189305
ACN	
Business address	5 Barnfield Rd, Claremont, 6010, WA, Australia
Postal address	
Main Phone number	0419864493
Fax	
Primary email address	sarah@mhenergy.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

9.1.2.1 You must provide the date/income year that you became a small business entity:

11/06/2008

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	Sarah
Last name	Rankin
Job title	Managing Director
Phone	0419 864 493
Mobile	0419 864 493
Fax	
Email	sarah@mhenergy.com.au
Primary address	5 Barnfield Road, Claremont, 6010, WA, Australia
Address	

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

I, Sarah Rankin, 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:  Date: 13/02/2022

I, Sarah Rankin, the person proposing the action, consent to the designation of \_\_\_\_\_ as the proponent for the purposes of the action described in this EPBC Act Referral.

Signature:  Date: 13/02/2022

I have read the Department of the Environment and Energy's guidance in the online form concerning the definition of a small business entity and confirm that I qualify for a small business exemption.

Signature:  Date: 13/02/2022



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## Proposed designated proponent

### 9.2.1 Is the proposed designated proponent an organisation or business?

☒ Yes ☐ No

#### Organisation

Organisation name (as registered for ABN/ACN)	MATTISKE CONSULTING PTY LTD
Business name	
ABN	39063507175
ACN	
Business address	28 Central Rd, Kalamunda, 6076, WA, Australia
Postal address	
Main Phone number	0892571625
Fax	
Primary email address	libby@mattiske.com.au
Secondary email address	

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

First name	Libby
Last name	Mattiske
Job title	Managing Director
Phone	0892571625
Mobile	0417987100
Fax	
Email	libby@mattiske.com.au
Primary address	28 Central Rd, Kalamunda, 6076, WA, Australia
Address	

#### Declaration: Proposed Designated Proponent

I, ELIZABETH (LIBBY) MATTISKE, 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: [Signature] Date: 13/07/2022





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### 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)	Moonies Hill Energy Pty Ltd
Business name	
ABN	76131189305
ACN	
Business address	5 Barnfield Rd, Claremont, 6010, WA, Australia
Postal address	
Main Phone number	0419864493
Fax	
Primary email address	sarah@mhenergy.com.au
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	Sarah
Last name	Rankin
Job title	Managing Director
Phone	0419864493
Mobile	
Fax	
Email	sarah@mhenergy.com.au
Primary address	5 Barnfield Rd, Claremont, 6010, WA, Australia
Address	

#### Declaration: Referring party (person preparing the information)

I, Sarah Rankin, 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:  Date: 13/07/2022



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
govt_approval_conditions	* Mattiske Flora Fauna and Vegetation Report and Appendices 2022.pdf
govt_approval_conditions	* 1.4.1 EPA Final Determination - CCF29042011_00001 not assessed letter.pdf
govt_approval_conditions	* 1.4.3 2011-10-12 Advice - Kojonup Wind Farm - Noise Assessment.pdf
govt_approval_conditions	* Herring Storer Acoustics Noise Impact FRWF 2021.pdf
govt_approval_conditions	* DNV Flat Rocks Shadow Flicker and Blade Glint Assessment Report 2021.pdf
govt_approval_conditions	* DNV Zone of Visual Influence Maps 2021.pdf
govt_approval_conditions	* Review of Landscape and Visual Assessment 2021.pdf
govt_approval_conditions	* Environmental-Impact-Report.pdf
govt_approval_conditions	Att 13 - EPA Determination.pdf
govt_approval_conditions	Att 9 - Flat Rocks Wind Farm DA Amendment Report 2021.pdf
localgov_approval_consent	* Shire of Kojonup DB.BDA.8 2021 DA Amendment Determination Notice.pdf
localgov_approval_consent	* 20211208 - JDAP Determination Notice - 1359 - Flat Rocks Wind Farm.pdf
localgov_approval_consent	Att 2 KO DA Amendment 2021.pdf
localgov_approval_consent	Att 4 - KO DA Conditions and Approval 2016.pdf
localgov_approval_consent	Att 5 - JDAP DA Condiotns and Approval 2017.pdf
localgov_approval_consent	Att 6 -KO DA 2011.pdf
localgov_approval_consent	Att 7 - JDAP DA 2013.pdf
localgov_approval_consent	Att 3 - JDAP DA Determination Amendment 2021.pdf
public_consultation_reports	* FRWF Stakeholder report.pdf
public_consultation_reports	* Appendix-B-Ethnographic-Survey-Report.pdf
public_consultation_reports	* Appendix-C-Archaeological-Survey-Report.pdf
public_consultation_reports	Att 10 -FRWF Stakeholder report.pdf
public_consultation_reports	Att 11 - Ethnographic Survey Report.pdf
public_consultation_reports	Att 12-Archaeological Survey Report.pdf
flora_fauna_investigation	Att 14 - Mattiske 2010.pdf
flora_fauna_investigation	Att 1 - Mattiske 2022.pdf
hydro_investigation_files	Att 8 - Environmental Impact Report.pdf

Appendix B
Coordinates
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\* NOT PUBLISHED - SUPERSEDED



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