



## Alkimos Lot 1004 Residential Development Assessment Documentation – Further Information

Prepared for  
SEWPaC

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# Alkimos Residential Development Further Assessment Information

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# Introduction

The Department of Sustainability, Environment, Water, Population and Communities (SEWPaC) on 4 May 2011 provided their decision and approach based on the submitted referral documentation, to assess the proposed Controlled Action at Alkimos Lot 1004 Residential Development on '*Preliminary Documentation*'.

The following documentation sets out the request by the Department, letter dated, 23 May 2011 (**Attachment 1**), for additional information required to complete the assessment and refers to specifically prepared documentation that will assist the department in assessing the relevant impacts in relation to EPBC Referral: 2011/5902.

As you may be aware, LandCorp are proposing to initiate the release of several urban residential communities in the North West Corridor of metropolitan Perth to accommodate urban growth in the region, with Lend Lease having development rights for the release of Lot 1004. As has previously been discussed with your department, the nature of land holdings and tenure in the area has prevented the potential for a combined referral encompassing all sites in the Alkimos Eglinton District area.

As discussed within the referral documentation and considering the need to ensure that all these sites are viewed by the Department in a regional context, provided as an addendum to the below *Additional Information*, is a region specific planning document which provides the planning framework and environmental outcomes achieved for the North West Corridor (see section 1).

# 1 North West Corridor Strategic Plan

Consideration and delivery of regional conservation outcomes have further been considered and discussed through the preparation of the *North West Corridor Strategic Plan* (recently provided to SEWPaC to aid current and future assessments).

The Strategic Plan provides the opportunity to assess Lend Lease proposed biodiversity conservation in a strategic way focusing on landscape scale outcomes for matters of National Environmental Significance which may have been unable to be achieved solely through site by site assessment.

A key component in the preparation of this document was to provide the Department with the planning background that has shaped the recent urban growth in the region and in particular, further provide a holistic representation of the mitigation measures which ought to be considered when evaluating the significance of environmental impacts to matters of National Environmental Significance in relation to all LandCorp sites.

## ***Planning History***

The protection of biodiversity values, including the conservation of habitat that is utilised by Carnaby's Black Cockatoo and Graceful Sun Moth, has and will continue to be considered at various stages of planning and approvals. In particular, the regional planning process has already provided for the conservation of large tracts of habitat within Regional Open Space (ROS). Further planning at the local scale and the State and Federal approvals process will also contribute to biodiversity protection supplementing the contributions that have already been made at the regional level.

### *WA Planning and environmental assessment framework*

The land use planning and development system in Western Australia allocates land for various purposes and regulates certain types of development and land use. Planning decision-making influences environmental outcomes through a hierarchical or tiered planning framework (EPA 2008). The following information in regard to this process is adapted from *Environmental Guidance for Planning and Development - Guidance Statement No 33* (EPA 2008).

Decisions of land use, and the evaluation of associated environmental impacts, are made at various stages in the planning process. This involves various statutory and non-statutory planning processes from broad scale regional planning down to local planning approvals:

- Strategies and overarching policies (regional strategy plans and statements of planning policy)
- Region schemes and their amendments
- Local planning strategies
- Town planning schemes and their amendments
- Structure plans

- Local planning policies
- Subdivision approvals
- Development and land use approvals.

The evaluation of environmental implications of planning decisions is primarily the role of the EPA, the statutory authority that is the primary provider of independent environmental advice to Government. The *Environmental Protection Act 1986* (EP Act) provides for the EPA to assess the potential environmental impacts from changes in land use, including conversion of uncleared crown or private land to urban and industrial areas, primarily over two levels of planning approval:

- 1) Broad scale planning includes strategic and most structure planning, region schemes and their amendments, whole of municipality town planning schemes and some town planning scheme amendments
- 2) Local area planning includes subdivision and development, some town planning scheme amendments and detailed local structure plans.

The planning legislation requires that most planning schemes and their amendments be referred to the EPA to decide whether to apply formal environmental impact assessment.

Differing types and detail of environmental information and assessment are required at each level. For every environmental issue that applies to an area, there will generally be an optimum stage at which particular information should be provided.

Regional conservation planning is addressed in broad scale planning, in particular at the region scheme stage i.e. as part of updating or amending the Metropolitan Region Scheme (MRS) administered by the State's Western Australian Planning Commission (WAPC). The MRS is the overriding determinant of permissible land uses on any parcel of land in the Perth metropolitan boundary. An amendment involves rezoning land for a different use and the EPA assesses the likely environmental impact or benefit of any change and makes a recommendation to the State on whether to proceed. The level of information and evaluation on environmental issues such as biodiversity protection at the MRS amendment stage must be sufficient to address issues such as the prioritisation of areas for conservation and designation of development zones compared to conservation zones at the broad regional scale. The rezoning of land for urban or industrial use for example must be supported by an assessment of likely direct or indirect impacts of changing to these uses on biodiversity and in context of areas of habitat retained in conservation zones in the MRS. Field survey work, modelling, assessment, and advice by experts is taken into account by the WAPC in designating land uses in regional planning and then documented and provided to the EPA to assist it in making its assessment. It is at the MRS stage that Regional Open Space (ROS), zoned for Parks and Recreation (which includes conservation purposes), is designated.

The EP Act also provides for the EPA to consider environmental implications of broad scale land use decisions by Local Government Authorities (LGAs), such as urban and industrial land zoning and designation of conservation areas, as part of updating or developing new District or Town Planning schemes.

In addition to these statutory broad scale planning processes, the EPA, DEC and other agencies can also provide comment on regional structure plans and strategies developed by the WAPC, which indicate future intentions for land use. This phase of planning will commonly precede actual statutory rezoning through scheme amendments and is an early opportunity for environmental agencies to provide advice in regard to environmental implications and conservation planning.

At the finer scale, the EPA has a statutory role, under the EP Act, in some aspects of local area planning, such as impact assessment of amendments made to District or Town Planning schemes by LGAs. Similar to at the regional level, it can also provide advice to LGAs, along with other agencies, on local planning strategies and structure plans.

Providing it has had the opportunity to consider the environmental implications of a particular land use through its statutory role in assessing planning schemes, it would be unusual for the EPA to get involved in local planning processes, such as at the subdivision or development application stage, even the clearing of vegetation/habitat is proposed. This is because the major decisions in regard to conservation and regional biodiversity, and the EPA's consideration of these decisions, have already been made as part of regional and local planning schemes and amendments. The EPA can however decide to assess subdivision and development proposals if it determines that it has not had sufficient previous opportunity to assess current environmental implications of development and if they are referred under s38 of the EP Act.

#### *Regional planning and biodiversity protection*

The NW Corridor is situated within the jurisdiction of the City of Wanneroo, an important growth area earmarked for urban development within the northern suburbs of the Perth metropolitan region.

Strategic planning for the Perth metropolitan region began in the 1950s when the first strategic plan for Perth, *Stephenson Hepburn Plan for the Metropolitan Region, Perth and Fremantle, Western Australia 1955: a report prepared for the Government of Western Australia* (Stephenson-Hepburn plan), was released. Since then a number of other planning strategies for the Perth and the Peel regions have been established to augment the principles of the Stephenson-Hepburn plan. Development in the North West coastal area of Perth has been proposed since the 1970s and commenced planning in the early 1990s.

The report *Planning Structure for the North West Corridor*, released in 1977 by the former Metropolitan Region Planning Authority, provided a structure plan to guide development in the North West Corridor, including the Alkimos Eglinton District. The 1987 report *Planning for the Future of the Perth Metropolitan Region* identified among other areas in the metropolitan region, the "North West Corridor" area for urban development. Following the adoption of Metroplan in 1990, the 1977 Corridor Structure Plan was reviewed and replaced by the WAPC's North West Corridor Structure Plan (1992).

The management of potential environmental impacts and implications of urban development in the North West Corridor has been considered by WA State environmental agencies and planning authorities over several tiers of planning. The consideration of the impacts of urban development has attracted commitments by Government in regards to biodiversity protection and conservation management, including establishment of conservation areas.

In 1992 the North West Corridor Structure Plan (NWCSP) established in more detail the land use planning for the corridor – identifying land for urban growth primarily along the coast and protecting land for Parks and Recreation and other non-urban uses primarily inland – from Hepburn Avenue in the south to Yanchep/Two Rocks in the north. The Environmental Protection Agency (EPA) provided advice on the NWCSP that would form the framework for more detailed consideration at following stages. This included an indication of the likely requirements for retention of land for conservation to ensure its objectives for the protection of native flora and fauna were met in subsequent re-zonings and district structure plans that would address planning at a finer scale.

### *District planning and biodiversity protection*

Following endorsement of the NWCSP and its subsequent update, structure plans and related amendments to the Metropolitan Region Scheme (MRS)<sup>1</sup> for component districts within the North-West Corridor were initiated to rezone the land such that it allowed the proposed uses indicated on the NWCSP. In regards to LandCorp owned land, this included:

- MRS Amendment 932/33 in 1994 for the Alkimos-Eglinton area to support the land uses proposed in the initial 1993 District Structure Plan for this area
- MRS Amendment 1029/33 in 2005 for the Alkimos Eglinton District to implement changes proposed in the second 1997 DSP (superseded by the Alkimos–Eglinton Concept (District) Structure Plan - AESDP)
- MRS Amendment 948/33 North West corridor (East Wanneroo) to implement the changes in land use proposed in the NWCSP.

MRS Amendment 932/33 provided for the rezoning of land to allow uses consistent with the NWCSP and the 1993 District Structure Plan for the Alkimos-Eglinton area, including to provide both urban land and parks and recreation land (Regional Open Space) for conservation. This Amendment rezoned large portions of the project area from 'Rural' to areas from urban development through to conservation reserves. The EPA provided informal advice to the then State Planning Commission on this amendment in 1993 including in regard to the protection of regionally significant vegetation and wetlands.

MRS amendment 1029/33 provided for changes in the zoning of land to be consistent with an updated AEDSP, developed by the Department for Planning and Infrastructure and the City of Wanneroo, for the Alkimos-Eglinton District. The subject area was bounded by the Indian Ocean to the west, the Mitchell Freeway to the east, the suburbs of Butler and Jindalee to the south and Yanchep to the north. It comprised of 2,660 hectares (ha) with a coastline 7.5km in length and is 4.5km in width from the coast inland, including LandCorp's Alkimos-Eglinton and South Yanchep landholdings. The amendment and DSP defined the planning for the future development of Alkimos, Eglinton and Yanchep areas, providing further detail in terms of movement patterns and activity centres. It established:

- A public purposes site for a Waste Water Treatment Plant (WWTP), Groundwater Treatment Plant (GWTP) and buffers
- Regional road alignments (Marmion Avenue and Connolly Drive) and Mitchell Freeway alignment
- The northern suburbs passenger railway alignment
- Coastal foreshores
- Parks and recreation links.

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<sup>1</sup> The MRS is the overarching planning scheme for land use in the Perth metropolitan area. The MRS defines the future use of land, dividing it into broad zones and reservations. It requires local government local planning schemes to provide detailed plans for their part of the region. These schemes must be consistent with the MRS.

The EPA provided advice on a number of biodiversity issues including the conservation of critical habitat for Carnaby's Black Cockatoo and retention of areas of natural vegetation in Very Good to Good condition of the Quindalup Vegetation Complex (in which high value GSM habitat is occurs).

In the eastern portion of the NW Corridor, MRS Amendment 948/33 provided for the rezoning of land for urban and industrial development and roads and reserves land for parks and recreation within the East Wanneroo portion of the NW Corridor, where LandCorp's Neerabup industrial land is located. As part of this assessment, the EPA considered a study into the conservation value of both wetland and upland remnant vegetation in the area, which showed there were areas of high conservation significance. The WAPC took this study into account in designating 1750 hectares of land for Parks and Recreation to protect its conservation value (EPA 1994).

No further major amendments to the MRS in the areas of the NW Corridor subject to the Strategic Plan are currently anticipated but if did occur would be subject to EPA advice and assessment (where appropriate).

The EPA has also provided advice on District Planning Scheme 2, which includes Neerabup Industrial Estate, and hence further considered the environmental implications of development of this land at this stage.

#### *Further local area planning processes and biodiversity protection*

Subsequent to MRS Amendment 1029/33 and the AEDSP, local structure planning processes for Alkimos and South Yanchep have been prepared to guide subdivisions and development of land in the area at a finer scale. The structure plans have been prepared in the context and requirements set out by the AEDSP, but further addresses urban design and open space requirements at the local level. This includes delineation of public open space (POS) while recognising and ensuring the provision of ROS identified in the AEDSP. The retention of potential habitat for Carnaby's Black-Cockatoo and Graceful Sun Moth has been considered in this local planning stage with additional habitat proposed in POS for conservation protection, in addition to that conserved in ROS.

In regards to Neerabup, the City of Wanneroo prepared the Neerabup Industrial Area Structure Plan (As Amended), which was adopted in January 2005 for the site, under the provisions of Part 9 of City of Wanneroo District Planning Scheme No. 2 (DSP 2). This Structure Plan has not been assessed formally by the EPA, but the (then) DEP did provide a submission during the public advertisement period. The Industrial Zoning of the NIA was considered by the (then) DEP as part its assessment of DSP 2, which was considered to fulfil the statutory assessment responsibilities of the DEP (now EPA). In a broad sense, the EPA has had the opportunity to assess the environmental impact of the rezoning of the land to industrial and related impacts of clearing and conversion to industrial lots, and in context of the addition of 1750 ha of bushland into 'Parks and Recreation that occurred as a result of Amendment 948/33. The Structure Plan includes requirements for subdivision to management environmental issues.

The next stage of planning and approvals across the NW Corridor LandCorp landholdings will be the subdivision approval. Environmental agencies and the City of Wanneroo will provide advice to the WAPC on such subdivisions, which will include reference to how environmental issues have been addressed. For example, the City of Wanneroo local planning policy will require a minimum of 3% of the total development area to be for POS for the purpose of conservation. Habitat for Graceful Sun Moth and Carnaby's Black Cockatoo will be a key consideration in the designation of this POS.

The EPA typically would not formally assess a subdivision under the EP Act when it has already considered the development of this land through advice/assessment on the MRS amendment and

local/district planning scheme zoning in which it is located. This is contingent on no new environmental issues having arisen and the subdivision being consistent with EPA advice and the environmental conditions of Structure Plans applied through the planning process, including the conservation of any land it has advised must be retained to ensure EPA objectives are met.

### ***In Summary***

It should be noted that the *North West Corridor Strategic Plan* and in particular the provision of Regional Open Space by proponents, to offset impacts from proposed development throughout the North West Corridor, provides for the retention and protection in perpetuity of key habitat for both the Graceful Sun Moth and Carnaby's Black-Cockatoo. Lend Lease is of the belief that conservation, management and the long term protection of key habitat within these areas should be taken into account when considering the significance of impact of clearing in the designated development zoned (i.e. urban, industrial) areas.

The North West Corridor Strategic Plan will provide the Department with an understanding of the regional land use planning that has occurred and the principles that Lend Lease and LandCorp will apply to its land developments for the protection of Carnaby's Black-Cockatoo and Graceful Sun Moth in the North West Corridor. These principles are carried through at a local level within the referral specific for each site and indeed Alkimos Lot 1004. It is believed that the North West Corridor Strategic Plan will assist when considering this and subsequent development (referrals) in the region such that:

- The timeframes for future approval decisions and assessments under the EPBC Act may be shortened with the Department having more information upfront on how the proposed action fits into overall regional planning and conservation efforts
- The majority of information needed to complete assessments is provided upfront and therefore a lower level of assessment(s) would be likely for LandCorp proposals in the North West Corridor.

## 2 Management of Protected Local Habitat

A full breakdown of the management strategies and proposed implementation is provided in the *North West Corridor Strategic Plan* (Section 6.2). Provided below is a summary of actions.

To ensure the ongoing security for conservation of Regional Open Space lands, transfer of this land to the WA Government (DEC) is to be undertaken. Until responsibility for the ongoing management of these areas has been finalised, responsibility will fall with the City of Wanneroo.

A Plan of Management is to be prepared by Lend Lease (as a condition of subdivision), which will then guide the ongoing management of the conservation areas. This in combination with the specified reserve purpose of these areas will provide a formal, ongoing protection outcome for the bushland not normally achieved through other mechanisms.

In addition to the Regional Open Space, land zoned for Public Open Space (conservation) within the site will require formal management. These areas are situated within strategic locations which meet the requirements of provision for conservation of local natural assets. The care, control and management will rest with the City of Wanneroo to be protected through provisions in the Town Planning Scheme. This is to be achieved through a condition at subdivision requiring the Public Open Space to be ceded to the Crown free of cost and consequently vested in the City of Wanneroo for the purposes of local conservation.

## 3 2011 Graceful Sun Moth Surveys

2011 Graceful Sun Moth survey reports, for both the land at Lot 1004 and those mitigation areas of Regional Open Space (within Lot 1003) are appended in **Attachments 2 and 3**.

## 4 Management and Tenure of Offsets

Discussions and arrangements with WA DEC in relation to the acquisition of a suitable parcel of land for offsetting impacts (offsite) to Carnaby's Black-Cockatoo are near completion and are to be finalised by DEC upon conditional approval. Purchase of offset lands (by DEC) will follow the criteria outlined in the Mitigation and Offsets Management Plan (**Attachment 4**), with DEC having defined the requirements further to meet the needs of the agency.

General arrangements as supplied by Alex Errington of the '*DEC Land Tenure Project*' and are as follow:

- The consolidated property will be at least 60 ha in area containing a mix of habitat features typical of the area to be impacted (see below).
- The site is located within a DEC area of interest, north of Gingin (approximately 65km north east of the Alkimos 1004 site). (It is understood that SEWPaC officers are currently visiting these sites to ensure their suitability for the offsetting of impacts to local foraging habitat).
- The sites contain good - very good condition Banksia spp. woodland/shrubland (e.g. *B. attenuata* *B. Menziesii*) typical of key Carnaby's Black-Cockatoo foraging habitat in the Dandaragan Plateau subregion (see **Attachment 5** for full details of the area). Future DEC tenure and management as a Nature Reserve is likely to increase the condition and feeding value of the site following purchase.
- Final property selection is expected to take place in conjunction with SEWPaC approval and conditions. The site selection will be finalised and purchased by DEC, with the intention of securing the lands as a Nature Reserve, and consequently managed as such in perpetuity by DEC. Lend lease will reimburse DEC for the cost of acquisition.
- The Alkimos 1004 site contains habitat varying from *degraded* to *good* (Syrinx Env). The site acquired by DEC will contain vegetation which has equivalent habitat values to that of the Alkimos 1004 development for the Carnaby's Black-Cockatoo on the Swan Coastal Plain.

WA DEC has previously procured (at least) eight properties in the Gingin area for proponents requiring offset sites as part of an EPBC Act approval process. Funding will be provided to the DEC following the commencement of development of the Alkimos 1004 project. This course of action has been endorsed by SEWPaC on each occasion, with the general outcome ensuring improved recovery and protection of habitat (and the species) following unavoidable impacts to habitat due to urban expansion in the Perth metropolitan region.

## 5 Known Carnaby's Breeding Sites

Information on the relevance for Carnaby's Black-Cockatoo foraging and breeding in the Alkimos area and surrounding regional habitat is discussed in section 4.1 (and subsections) of the *North West Corridor Strategic Plan*. **Figure 1** below depicts known areas for Carnaby's Black-Cockatoo roosting in the north-west corridor and also provides the location of the only two known breeding sites.



Figure 1: Location of known breeding and roosting sites in the vicinity of the Alkimos site

## 6 Threatened Ecological Communities

**Sedgelands in Holocene dune swales of the southern Swan Coastal Plain** occur in linear damplands and occasionally sumplands, between Holocene dunes. The present known distribution of the Holocene swale community is almost entirely located within linear wetland depressions (swales) occurring between parallel sand ridges of the Rockingham - Becher Plain (70km south of the project site). Additional occurrences include a small area at Yanchep (>10km north of the site) and a possible occurrence in a single swale at Preston Beach (140km south of the site) (V. English et al., 2002). Wetlands occur within the swales where the watertable is close to or at the ground surface in the wetter months of the year (V. English et al, 2002).

The current extent of the Yanchep occurrence is confined to an area less than one (1) ha, which is protected wholly within the Yanchep National Park (10km north).

**Aquatic Root Mat Community in Caves of the Swan Coastal Plain** occur in caves with permanent streams and pools which support dense growths of root mats. The root mats provide a constant and abundant primary food source for some of the richest aquatic cave communities known. The communities comprise a complete food web; the rootlets and their associated microflora providing the primary food source, and invertebrate assemblages include root mat grazers, predators, parasites, detritivores and scavengers, completing the trophic interactions.

The persistence of the root mat communities depends on the presence of permanent water in caves. The streams or pools need to be sufficiently warm, and not too deep below the ground-surface, for tree roots to reach and grow in the water (Jasinska, 1995).

Yanchep National Park (10km north) contains six caves (YN99, Cabaret Cave, Carpark Cave, Twilight Cave, Water Cave and, in the past, Gilgie Cave) which are known to contain streams or pools fed by groundwater from the Gnangara Mound that contain root mats from Tuart trees (*Eucalyptus gomphocephala*). Four caves on the Leeuwin Naturaliste Ridge also contain root mat communities (Jasinska, 1997). These are considered to be different from the community at Yanchep. No caves or suitable habitat are present on the proposal site.

Vegetation surveys (see referral documentation) on site did not identify either of the above EPBC Act listed threatened ecological communities. Accordingly, considering the above, no impact, direct or indirect is expected to either community from the proposal.

## 7 Attachments

**Attachment 1:** SEWPaC request for further information

**Attachment 2:** Lot 1004 Graceful Sun moth Survey 2011

**Attachment 3:** Lot 1003 Graceful Sun moth Survey 2011

**Attachment 4:** Mitigation and Offsets Management Plan

**Attachment 5:** Dandaragan Plateau Sub-region



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