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Waubra Battery Energy Storage System (BESS)

Flora and fauna assessment

Final Report

Prepared for ACCIONA Energía

26 June 2026

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Biosis acknowledges the Aboriginal and Torres Strait Islander peoples as Traditional Custodians of the land on which we live and work.

We pay our respects to the Traditional Custodians and Elders past and present and honour their connection to Country and ongoing contribution to society.

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Contents

Contents.....	ii
Summary	iv
Ecological values	iv
Government legislation and policy	iv
Guidelines for the removal, destruction or lopping of native vegetation (the Guidelines).....	v
Recommendations.....	v
1 Introduction	1
1.1 Project background	1
1.2 Scope of assessment	1
1.3 Location of study area	1
2 Methods	3
2.1 Database review	3
2.2 Definitions of threatened species and communities	3
2.3 Determining likelihood of occurrence of threatened species	3
2.4 Site investigation.....	4
2.4.1 Flora assessment	4
2.4.2 Fauna assessment	5
2.4.3 Permits	5
2.5 Qualifications	5
2.6 Legislation and policy.....	6
2.7 Mapping.....	6
3 Results	7
3.1 Vegetation and fauna habitat	7
3.2 Landscape context	10
3.3 Threatened species and ecological communities	10
3.4 Further survey recommendations.....	10
4 Biodiversity legislation and government policy	12
4.1 Commonwealth	12
4.1.1 <i>Environment Protection and Biodiversity Conservation Act 1999</i>	12
4.2 State	13
4.2.1 <i>Flora and Fauna Guarantee Act 1988</i> (FFG Act)	13
4.2.2 <i>Catchment and Land Protection Act 1994</i> (CaLP Act)	14
4.2.3 <i>Planning and Environment Act 1987</i> (incl. Planning Schemes).....	14
4.2.4 <i>Environment Effects Act 1978</i>	15
4.2.5 <i>Environment Protection Act 2017: Environmental Reference Standards</i>	15
5 Victoria's Guidelines for the removal, destruction or lopping of native vegetation	17
5.1 Proposed removal of native vegetation	18

6 Key ecological values and recommendations	19
References.....	21
Appendices	22
Appendix 1 Flora.....	23
Appendix 1.1 Flora species recorded from the study area.....	23
Appendix 1.2 Listed flora species	25
Appendix 1.3 Threatened ecological communities	33
Appendix 2 Fauna.....	34
Appendix 2.1 Listed fauna species	35
Appendix 2.2 Migratory species (EPBC Act listed).....	41
Appendix 3 Photos of the study area	42
Tables	
Table 1 Conservation status of threatened species and ecological communities	3
Table 2 Summary of vegetation and habitat types within the study area.....	9
Table 3 Summary of EPBC Act and FFG Act listed species most likely to occur in the study area.....	10
Table 4 Threatened ecological communities.....	10
Table 5 Assessment of project in relation to the EPBC Act.....	12
Table 6 Summary of key ecological values, potential implications of developing the study area and recommendations to minimise ecological impacts during the design phase.	19
Table 7 Flora species recorded from the study area.....	23
Table 8 Threatened flora species recorded or predicted to occur within 5 km of the study area.....	25
Table 9 Threatened ecological communities predicted to occur within 5 km of the project area.....	33
Table 10 Threatened fauna species recorded or predicted to occur within 5 km of the study area.....	35
Table 11 Migratory fauna species recorded or predicted to occur within 5 km of the study area	41
Figures	
Figure 1 Location of the study area, Waubra.....	2
Figure 2 Ecological features of the study area, Waubra	11

Summary

Biosis Pty Ltd was commissioned by ACCIONA Energía (Acciona Energía) to undertake a flora and fauna assessment of the proposed location of a Battery Energy Storage System (BESS). The study area is located approximately 2.5 kilometres west of Waubra and approximately 31 kilometres north-west of Ballarat.

Ecological values

Key ecological values identified within the study area are as follows:

- One *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) listed species is likely to occur within the study area:
 - White-throated Needletail *Hirundapus caudacutus*
- One additional *Flora and Fauna Guarantee Act 1989* (FFG Act) listed species is likely to occur within the study area:
 - Little Eagle *Hieraaetus morphnoides*

Government legislation and policy

An assessment of the project in relation to key biodiversity legislation and policy is summarised below.

Legislation / policy	Relevant ecological feature on site	Permit / approval required	Notes
EPBC Act	White-throated Needletail is considered likely to occur within the study area.	An EPBC Act referral is not likely to be required for the current development proposal.	White-throated Needletail is a predominantly aerial species and is unlikely to utilise any terrestrial habitat within the study area. As a result, this species will not be significantly impacted by the proposed works.
FFG Act	Little Eagle is considered likely to occur within the study area.	Permits under the FFG Act are not likely to be required for the proposed works.	Site is predominantly private land with small areas of impact proposed on some public roadsides. The extent of the proposed works is unlikely to significantly impact Little Eagle.
Planning & Environment Act	No native vegetation on site qualifies as a patch of native vegetation or a scattered tree as defined in the <i>Guidelines for the removal, destruction or lopping of native vegetation</i> (DELWP 2017a) (the Guidelines).	A planning permit is unlikely to be required to remove native vegetation.	Some scattered native vegetation is likely to occur in the understorey (for example, Wallaby Grass <i>Rytidosperma</i> spp.). However, the cover of these plants does not reach the threshold required to qualify as native

Legislation / policy	Relevant ecological feature on site	Permit / approval required	Notes
			vegetation as define in the Guidelines.
Catchment and Land Protection Act 1994 (CaLP Act)	One CaLP Act listed weed occurs within the study area: • Variegated Thistle <i>Silybum marianum</i>	Construction and operation of the BESS should be undertaken in a manner that minimises the spread of noxious weeds to the minimum extent necessary.	A site specific Construction Environment Management Plan (CEMP) can be implemented during construction to ensure that machinery and vehicle hygiene practices are followed.

Guidelines for the removal, destruction or lopping of native vegetation (the Guidelines)

Based on the current design (4 September 2025), the proposed development will not require the removal of native vegetation (as defined in the Guidelines as a patch or a scattered tree). However, removal of some scattered native understorey vegetation is likely to occur. The removal of scattered understorey vegetation does not require the purchase of native vegetation offset credits.

Recommendations

Future requirements for infrastructure and services must be forecast as much as possible at this time and allowance made outside any nominated reserves for all construction works. Any changes to the impact area that result in an extension of the footprint may require additional surveys.

1 Introduction

1.1 Project background

Biosis Pty Ltd was commissioned by Acciona Energía to undertake a flora and fauna assessment of 151 Troys Road and 202 Troys Road, Waubra (study area), the proposed location of a Battery Energy Storage System (BESS).

In June 2026 additional impact locations were proposed to account for the movement of large vehicles into the site and turning onto the local roads. An additional field assessment was undertaken at these locations and the following report updated.

1.2 Scope of assessment

The objectives of this investigation are to:

- Describe the vascular flora (ferns, conifers, flowering plants), vertebrate fauna (mammals, birds, reptiles, frogs, fishes) and decapod crustacea (e.g. crayfish) observed within the study area.
- Map native vegetation and other habitat features within the study area.
- Conduct a vegetation quality assessment (where required).
- Review the implications of relevant biodiversity legislation and policy, including Victoria's Guidelines for the removal, destruction or lopping of native vegetation ('the Guidelines').
- Identify potential implications of the proposed development and provide recommendations to assist with development design.
- Recommend any further assessments of the site that may be required e.g. a vegetation impact assessment or targeted searches for threatened species.

1.3 Location of study area

The study area is located in Pyrenees Shire Council approximately 2.5 kilometres west of Waubra and approximately 31 kilometres north-west of Ballarat (Figure 1). It encompasses approximately 15 hectares of private land that is currently used for agriculture within the Waubra Windfarm as well as multiple public roadsides.

The study area is within the:

- Victorian Volcanic Plains Bioregion.
- Hopkins River Basin.
- Management area of Glenelg Hopkins Catchment Management Authority (CMA).
- Pyrenees Shire.
- Traditional lands of the Wadawurrung people.

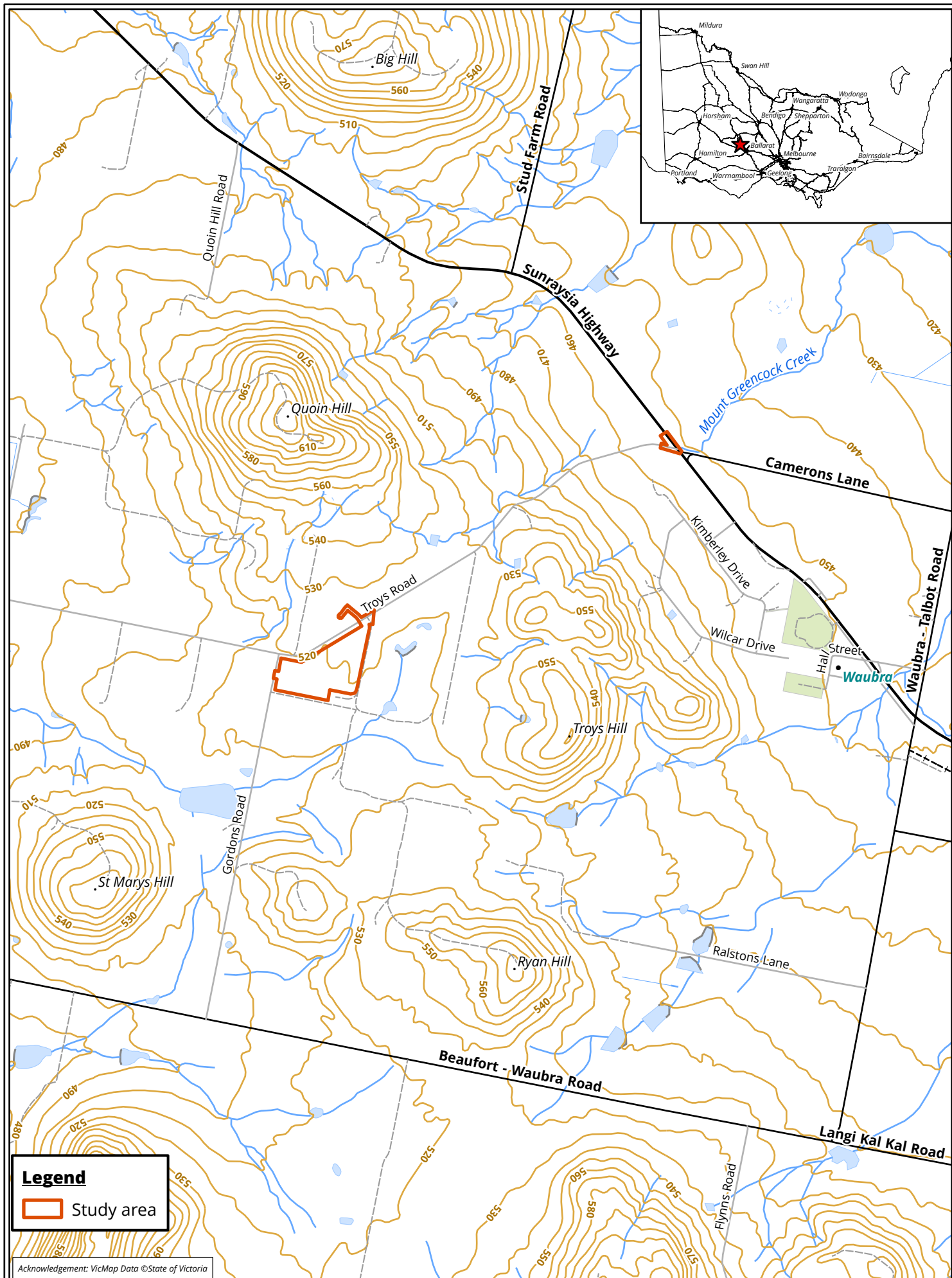


Figure 1 Location of the study area - Waubra, Victoria

2 Methods

2.1 Database review

In order to provide a context for the study area, information about flora and fauna from within 10 kilometres of the study area (the 'local area') was obtained from relevant biodiversity databases, many of which are maintained by the Victorian Government Department of Energy, Environment and Climate Action (DEECA) (formerly Department of Environment, Land, Water and Planning (DELWP)) or the Australian Government Department of Climate Change, Energy, the Environment and Water (DCCEEW). Records from the following databases were collated and reviewed:

- DEECA's Victorian Biodiversity Atlas (VBA), including the 'VBA_FLORA25, FLORA100 & FLORA Restricted' and 'VBA_FAUNA25, FAUNA100 & FAUNA Restricted' datasets (DSE 2009).
- DCCEEW's Protected Matters Search Tool for matters protected by the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Other sources of biodiversity information were examined including:

- DEECA's NatureKit mapping tool.
- DEECA's Habitat Importance maps.
- DEECA's Native Vegetation Regulations (NVR) Map online application tool.
- Planning Scheme zones including any precinct structure plans, overlays and particular provisions relevant to biodiversity based on <http://planningschemes.dpcd.vic.gov.au>.

2.2 Definitions of threatened species and communities

Threatened species and communities are listed under the EPBC Act and/or Victorian *Flora and Fauna Guarantee Act 1988* (FFG Act). The conservation status of a species or ecological community is determined by its listing status under Commonwealth or State legislation/policy (Table 1).

Table 1 Conservation status of threatened species and ecological communities

Government level	Conservation status
National	Listed as nationally critically endangered, endangered or vulnerable under the EPBC Act.
State	Listed as extinct, extinct in the wild, critically endangered, endangered, vulnerable or conservation dependent in Victoria under the FFG Act.

Lists of threatened species generated from the databases are provided in Appendix 1 (flora) and Appendix 2 (fauna). Each species has been assessed to determine its likelihood of occurrence based on the following process.

2.3 Determining likelihood of occurrence of threatened species

Likelihood of occurrence indicates the potential for a species or ecological community to occur regularly within the study area. It is based on expert opinion, information in relevant biodiversity databases and reports, and an assessment of habitats on the site. Likelihood of occurrence is ranked as negligible, low,

medium, high or recorded. The rationale for the rank assigned is provided for each species in Appendix 1 (flora) and Appendix 2 (fauna). Those species for which there is little or no suitable habitat within the study area are assigned a likelihood of low or negligible. Species with a low or negligible likelihood of occurrence are not included in the threatened species or biodiversity legislation and government policy sections of this report. These species are included in Appendix 1 (flora) and Appendix 2 (fauna) with a rationale for the low or negligible likelihood of occurrence assessment.

Only those species listed under the EPBC Act or the FFG Act (hereafter referred to as 'threatened species') are assessed to determine their likelihood of occurrence. The habitat value for threatened species is calculated by the Habitat Importance Modelling produced by DEECA (DELWP 2017b). Where threatened species are recorded in the study area this is noted in Appendix 1 (flora) and Appendix 2 (fauna).

Threatened species which have at least medium likelihood of occurrence are given further consideration in this report. The need for targeted survey for these species is also considered.

2.4 Site investigation

2.4.1 Flora assessment

The initial flora assessment was undertaken on 15 November 2024 by Hayley Sime (Botanist). A list of flora species was compiled and will be submitted to DEECA for incorporation into the VBA. Planted species were not recorded unless they were naturalised. A second field assessment was undertaken by Hayley Sime on 19 June 2026 to assess impacts proposed to public roadsides.

Native vegetation is defined in the Victoria Planning Provisions as 'plants that are indigenous to Victoria, including trees, shrubs, herbs, and grasses' (Clause 73.01).

The Guidelines classify native vegetation into two categories (DELWP 2017a):

- A **patch** of native vegetation (measured in hectares) is one of the following:
 - An area of native vegetation, with or without trees, where at least 25% of the total perennial understorey cover is native plants.
 - An area with three or more native canopy trees where the drip line (i.e. the outermost boundary of a tree canopy) of each tree touches the drip line of at least one other tree, forming a continuous canopy.
 - Any mapped wetland included in the Current wetlands map, available in DEECA systems and tools.
- A **scattered tree** is defined as a native canopy tree that does not form part of a patch of native vegetation.

Patch vegetation is classified into ecological vegetation classes (EVCs), which are the standard unit for classifying vegetation types in Victoria. They are described through a combination of floristics, lifeforms and ecological characteristics, and through an inferred fidelity to particular environmental attributes. Each EVC contains one or more floristic (plant) communities. The EVC benchmarks are standard descriptions that allow the vegetation quality on a given site to be determined under the Guidelines (DELWP 2017a).

A canopy tree is a mature tree that is greater than three metres in height and is normally found in the upper layer of a vegetation type. Ecological vegetation class descriptions provide a list of the typical canopy species. A scattered tree is defined as either small or large, and is determined using the large tree benchmark for the relevant EVC. The extent of a small scattered tree is the area of a circle with a 10-metre radius (i.e. 0.031

hectares), while the extent of a large scattered tree is a circle with a 15-metre radius (i.e. 0.070 hectares). A condition score is applied to each scattered tree based on information provided by DEECA's NVR Map.

Species nomenclature for flora follows the Victorian Biodiversity Atlas (VBA).

2.4.2 Fauna assessment

A desktop fauna assessment was undertaken by Wyn Russell (Senior Zoologist) to assess the fauna habitat values of the study area, and to determine the likelihood of threatened fauna species occurring. The desktop fauna assessment incorporated a review of database records of significant fauna, along with photographs and vegetation descriptions obtained during the flora assessment.

2.4.3 Permits

Biosis undertakes flora and fauna assessments under the following permits and approvals:

- Wildlife Authorisation issued by DEECA under the Victorian *Wildlife Act 1975* (Permit Number 10011235).
- Permit to Take/Keep Protected Flora issued by DEECA under the FFG Act (Permit Number 10011236).
- Permit to Take Protected Fish issued by DEECA under the FFG Act (Permit Number 10011237).
- Permit to Conduct Research in areas managed by the Parks Victoria issued by DEECA under the Victorian *National Parks Act 1975*, *Crown Land (Reserves) Act 1978* and *Parks Victoria Act 2018* (Permit Number AA-0002306).
- Permit to catch and release fish issued by the Victorian Fisheries Authority under the Victorian *Fisheries Act 1995* (Permit Number RP1220, Personal File Number 13041).
- Approvals 27.24 and 28.24 issued by the Wildlife and Small Institutions Animal Ethics Committee of the Victorian Government.
- Scientific Procedures Fieldwork Licence issued by the Victorian Government Wildlife and Small Institutions Animal Ethics Committee (Licence Number 20020).

2.5 Qualifications

Ecological surveys provide a sampling of flora and fauna at a given time and season. There are a number of reasons why not all species may be detected at a site during survey, such as low abundance, patchy distribution, species dormancy, seasonal conditions, and migration and breeding behaviours. In many cases these factors do not present a significant limitation to assessing the overall biodiversity values of a site.

The flora and fauna assessment of the main site was conducted in November which is an optimal time for survey of native vegetation and fauna habitat that is likely to occur within the study area. Additionally, the site is highly disturbed by historical agriculture reducing the likelihood that a survey at a different time of year is unlikely to yield different results. While the roadside assessment was undertaken at a sub-optimal time of year (June), this is not likely to have impacted the findings as the roadsides are highly disturbed and support a high cover of introduced weeds.

The proposed location of transmission line infrastructure was not closely surveyed during the initial assessment. However, the site was briefly assessed from the adjacent roadside, looking through the fence. As such, the following assumptions have been made:

- The proposed transmission line infrastructure is unlikely to impact native vegetation. This assumption is based on the low quality of vegetation and the absence of native vegetation in the roadside adjacent the proposed impacts and an assessment of the vegetation through the fence.

2.6 Legislation and policy

The implications for the project were assessed in relation to key biodiversity legislation and policy including:

- Matters listed under the EPBC Act, associated policy statements, significant impacts guidelines, listing advice and key threatening processes.
- Threatened taxa, communities and threatening processes listed under Section 10 of the FFG Act and associated action statements and listing advice.
- Guidelines for the removal, destruction or lopping of native vegetation (DELWP 2017a).
- Native Vegetation Management Plans prepared by Catchment Management Authorities.
- *Planning and Environment Act 1987*, specifically Clauses 12.01-2, 52.17 and 66.02 and Overlays in the Pyrenees Planning Scheme.
- Noxious weed and pest animal lists under the CaLP Act.
- *Environment Protection Act 1971*: State Environmental Protection Policy (Waters) 2018.

2.7 Mapping

Mapping was conducted using hand-held GPS-enabled tablets and aerial photo interpretation. The accuracy of this mapping is therefore subject to the accuracy of the tablets (generally ± 7 metres) and dependent on the limitations of aerial photo rectification and registration.

Mapping has been produced using a Geographic Information System (GIS). Electronic GIS files which contain our flora and fauna spatial data are available to incorporate into design concept plans.

3 Results

The ecological features of the study area are described below and mapped in Figure 2.

Twenty-one introduced flora species were recorded during the flora and fauna assessment and one native flora species is considered likely to occur. These species are listed in Appendix 1 (flora) and Appendix 2 (fauna). Threatened species recorded or predicted to occur in the local area are also listed in these appendices, along with an assessment of the likelihood of the species occurring within the study area.

3.1 Vegetation and fauna habitat

The study area can be separated into two zones when discussing the vegetation and fauna habitat:

- The main site: Most of the study area is included within the main site at 189 Troys Lane, Waubra.
- The transmission line route: This area comes out of the northern boundary of the main site, crosses Troys Lane and enters the Waubra terminal station.

Main Site

The main site has been highly modified through land clearing and long-term agricultural use, including rock removal, pasture improvement and livestock grazing.

No patches of native vegetation or scattered trees were recorded within the main site. Most of the site supports pasture comprised entirely of exotic grasses and weeds (Photo 1 and Photo 2), including Wimmera Rye-grass *Lolium rigidum*, Toowoomba Canary-grass *Phalaris aquatica* and Sweet Vernal-grass *Anthoxanthum odoratum*. The CalP Act declared Restricted weed Variegated Thistle *Silybum marianum* was also recorded within the paddock. The northern, western and southern boundaries of the site contain planted Monterey Pine *Pinus radiata*. While native vegetation was not observed during the assessment, scattered occurrences of understorey native vegetation such as wallaby grass *Rytidosperma* sp. may occur within the site. However, the cover is expected to be very low (1%).

Habitat for native fauna species is marginal, largely limited to marginal roosting, nesting, and foraging habitat for common bird species in the planted Radiata Pines *Pinus radiata*, and the airspace above the site. Open pasture does not provide habitat for most threatened native fauna, with the potential for occasional foraging by Little Eagle *Hieraaetus morphnoides*. A small shallow dam containing no aquatic vegetation and limited aquatic habitat occurs in the south of the study area. It is noted that the dam was dry at the time of the site assessment. Notwithstanding, the site is not considered to support waterways or wetland habitat.

Photos are provided in Appendix 3.

Transmission line route

The transmission line is proposed to connect the main site to the Waubra terminal station. The section of public roadside reserve that occurs within the transmission line footprint was not properly surveyed during the initial assessment. Both sides of Troys Road were surveyed and the proposed location within the Waubra terminal station was assessed through the fence. The roadside supports a high cover of weeds, particularly Toowoomba canary Grass. *Phalaris aquatica*.

While not properly assessed, from the roadside (outside the fence) the terminal station appears to support a high cover of introduced weeds and a low cover of native vegetation, similar to the BESS main site and the

adjacent roadsides (see Appendix 3). However, the true extent of native vegetation within the Waubra terminal station is not known.

Gordon Road access tracks

Three adjacent access tracks are proposed to provide connectivity between Gordons Road and the main site. The access tracks are proposed to cross a planted row of Radiata Pine along the western boundary of the property as well as the public roadside adjacent Gordon's Road. The roadside adjacent Gordon's road is dominated by introduced weeds and no native species were identified within the roadside during this assessment (see Appendix 3).

Troys Road and Sunraysia Highway swept paths/vehicle access

Locations where swept paths and/or tyres of large trucks overlap with roadside vegetation were assessed on Troys Road (into the entrance of the main site) and the corner of Sunraysia Highway and Troys Road (see Figure 2). No native vegetation was observed within the proposed locations for vehicle access or where swept paths occur over roadsides. Vegetation at the corner of Troys Road and Sunraysia Highway is dominated by the introduced weeds *Paspalum dilatatum* and Brown-top Bent *Agrostis capillaris*. No native species were identified during this assessment. While this could be the result of the time of year, it is considered unlikely that an assessment at a more optimal time of year would identify native vegetation cover high enough to qualify as a patch of native vegetation.

A patch of native vegetation was identified adjacent to the proposed impacts on the corner of Sunraysia Highway and Troys Road. The patch supports recruiting Blackwood *Acacia melanoxylon*. The location of this patch is shown on Figure 2.2.

Table 2 Summary of vegetation and habitat types within the study area

Vegetation or habitat type	Description	Location	Significant values
Predominantly introduced vegetation	The study area consists of a paddock that has been cleared and is currently used for grazing purposes. Native vegetation in these areas is likely to consist of very sparse, scattered understorey grasses. Most of the study area is dominated by exotic grasses such as Toowoomba Canary Grass, Wimmera Rye-grass and Sweet Vernal-grass.	Majority of the study area.	The Little Eagle may occasionally forage in the predominantly introduced grassy vegetation.
Constructed dams	A shallow and dry (at the time of assessment) dam occurs in the southern end of the study area. It supports limited aquatic habitat with no aquatic vegetation fringing the dam.	Southern end of the main paddock.	Due to historical clearance and disturbance of this dam, it is no longer likely to provide value to threatened fauna.
Planted vegetation	Planted Monterey Pine occur along the border of the study area providing shelter for the paddock.	North, west and south border of the paddock	No threatened fauna are likely to utilise these plantings.

3.2 Landscape context

The study area occurs within a landscape of cleared agricultural land. Agricultural paddocks adjacent the study area predominantly support grazing, with some instances of centre-pivot irrigated cultivation to the south-west. Native vegetation within this landscape appears to have been significantly cleared for agriculture, however the true extent of native vegetation (particularly native grasslands) is difficult to determine from aerial imagery alone. Mount Bolton and the land surrounding it appears to support the largest area of native vegetation within 6 kilometres of the study area. A small drainage line / creek runs to the south and east of the study area (approximately 200 metres away), connecting the Mount Emu Creek with several paddocks and constructed dams throughout the landscape.

3.3 Threatened species and ecological communities

Threatened species recorded or predicted to occur within 5 kilometres of the study area or from the relevant catchment (aquatic species) are listed in Appendix 1 (flora) and Appendix 2 (fauna). An assessment of the likelihood of these species occurring in the study area and an indication of where within the site (i.e. which habitats or features of relevance to the species) is included. A summary of those species recorded or with a medium or higher likelihood of occurring in the study area is provided in Table 3.

Table 3 Summary of EPBC Act and FFG Act listed species most likely to occur in the study area

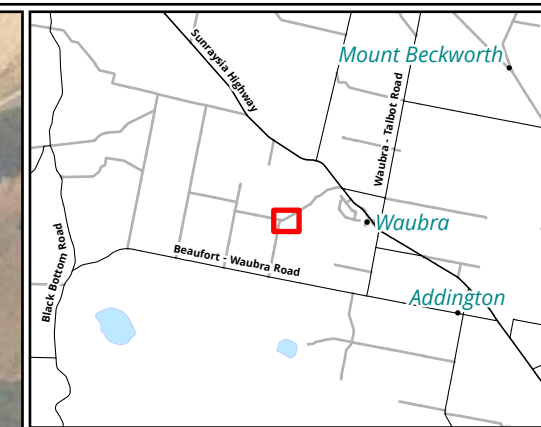
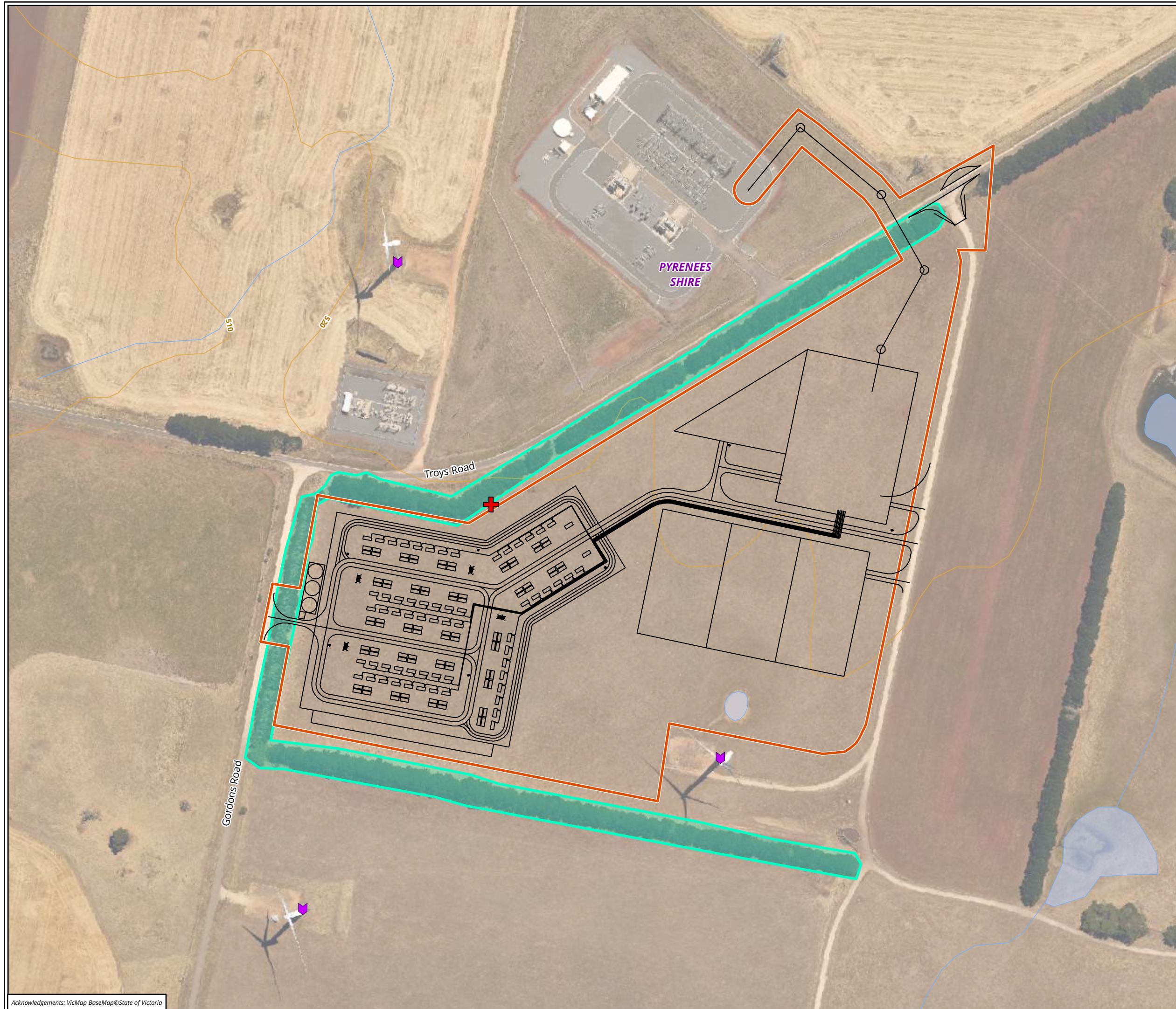
Species name	Listing status	Area of value within the study area
White-throated Needletail <i>Hirundapus caudacutus</i>	Vulnerable under EPBC Act Vulnerable under FFG Act	Airspace above study area, unlikely to utilise any terrestrial habitat.
Little Eagle	Vulnerable under FFG Act	Pasture and cleared paddock where small mammals such as European Rabbit <i>Oryctolagus cuniculus</i> are likely to occur.

Table 4 Threatened ecological communities

Five EPBC Act listed Threatened Ecological Communities and four FFG Act listed communities are modelled to occur within the study area. None of these listed communities are considered likely to occur within the study area due to the absence of native patch vegetation and scattered trees. While some scattered native vegetation occurs within the understorey of the study area, it does not occur at a high-enough cover to qualify as any of these listed communities.

3.4 Further survey recommendations

No additional surveys are recommended for the study area based on the current impact footprint. Should the impact footprint change, this report will need to be updated, and this recommendation may change.



Legend

- Study area
- Proposed BESS footprint
- ✶ Existing Waubra Wind Farm turbine

Ecological features

- Pines

Weed observations (CaLP Act)

- + Variegated Thistle

Hydrography

- ~ River, creek
- Lake, dam

Topography

- Contour 10 m interval

Figure 2.1 Ecological features of the study area - BESS area

0 20 40 60 80 100

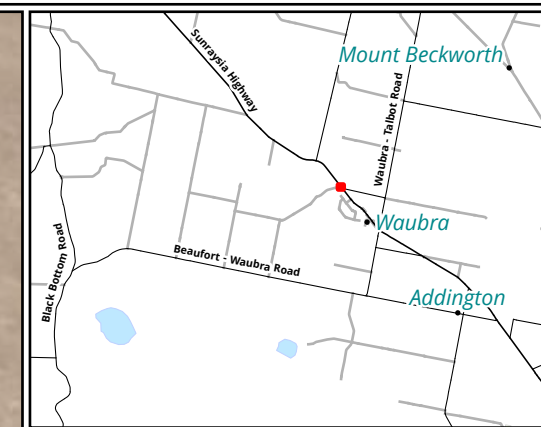
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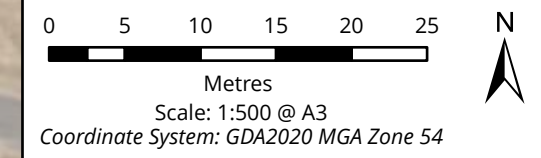


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- Legend**
- Study area
 - Proposed BESS footprint
- Ecological features**
- Planted vegetation
- Ecological Vegetation Classes (EVCs)**
- (VVP_0055_61) Plains Grassy Woodland
- Hydrography**
- River, creek
- Topography**
- Contour 10 m interval

Figure 2.2 Ecological features of the study area - Sunraysia Highway access



4 Biodiversity legislation and government policy

This section provides an assessment of the project in relation to key biodiversity legislation and government policy. It does not describe the legislation and policy in detail. Where available, links to further information are provided.

4.1 Commonwealth

4.1.1 *Environment Protection and Biodiversity Conservation Act 1999*

The EPBC Act applies to developments and associated activities that have the potential to significantly impact on Matters of National Environmental Significance (MNES) protected under the Act.

Further information including a guide to the referral process is available at <http://www.environment.gov.au/epbc/index.html>

The MNES relevant to the project are summarised in Table 5. It includes an assessment against the EPBC Act policy statements published by the Australian Government which provide guidance on the practical application of EPBC Act.

Table 5 Assessment of project in relation to the EPBC Act

MNES	Project specifics	Assessment against significant impact guidelines
EPBC Act listed species	26 EPBC Act listed flora species and 17 EPBC Act listed fauna species are predicted to occur within the study area. Of these, one species is considered likely to occur: White-throated Needletail No EPBC Act listed flora species are considered likely to occur. The likelihood of these species occurring in the study area is assessed in Appendix 1 (flora) and Appendix 2 (fauna).	White-throated Needletail is likely to occupy the airspace above the study area, however is unlikely to utilise the terrestrial habitat. As a result, the proposed development is unlikely to have a significant impact on this species.
EPBC Act listed ecological communities	5 EPBC Act listed Threatened Ecological Communities are predicted to occur in the project search area. None of these communities are considered likely to occur within the study area.	N/A
Migratory species	11 migratory species are recorded or predicted to occur in the project search area (Appendix D).	While some of these species would be expected to use the study area on occasion, the study area does not provide important foraging or breeding habitat for these species. As a result, the development is unlikely to result in significant impacts on any of these species.

MNES	Project specifics	Assessment against significant impact guidelines
Wetlands of international importance (Ramsar sites).	The closest Ramsar Wetland is approximately 150 kilometres from the study area.	Construction within the study area is unlikely to result in significant impacts to any Ramsar wetlands, given the works are proposed at least 150 km from the closest listed wetland.

On the basis of criteria outlined in the relevant Significant Impact Guidelines (DoE 2013), it is considered unlikely that a significant impact on a Matter of National Environmental Significance (MNES) would result from the proposed action. Referral of the proposed action to the Australian Government Minister for the Environment to determine whether the action requires approval under the EPBC Act is therefore not recommended.

4.2 State

4.2.1 Flora and Fauna Guarantee Act 1988 (FFG Act)

The FFG Act is a key piece of Victorian legislation on the conservation of threatened species and communities and on the management of potentially threatening processes. Under the Act a permit is required from DEECA to 'take' protected flora species. Permit exemptions under the Act generally apply to the non-commercial removal of protected flora from private land, unless there is 'critical habitat' that has been declared on the land. Authorisation under the Act is required to collect, kill, injure or disturb listed fish on private or public land.

Link for further information: <https://www.environment.vic.gov.au/conserving-threatened-species/victorias-framework-for-conserving-threatened-species>

The FFG Act defines public land as Crown land or land owned by, or vested in, a public authority, while private land is defined as any land other than public land. A public authority is defined in the FFG Act as a body established for a public purpose by or under any Act and includes:

- an administrative office
- a government department
- a municipal council
- a public entity
- a State-owned enterprise.

Native vegetation within the study area does not qualify as a FFG Act listed community. Additionally, no flora species listed as 'generally protected' under the FFG Act occur within the study area. Two FFG Act listed fauna species are likely to occur within the study area, however the proposed construction is unlikely to result in a significant impact.

The main site is proposed on private land, does not contain any declared 'critical habitat' for the purposes of the FFG Act and the flora species are not being taken for the purpose of commercial sale. The presence of rare or threatened flora and habitat for threatened fauna will be considered by the Responsible Authority in determining its response to an application for native vegetation removal under Clause 52.17 (see below). Where impacts are proposed on public roadsides, no impacts to protected flora, FFG Act listed flora and fauna or FFG Act listed communities are proposed. As a result, no FFG Act permits or requirements are necessary for the impacts proposed on public roadsides.

4.2.2 Catchment and Land Protection Act 1994 (CaLP Act)

The CaLP Act identifies and classifies certain species as noxious weeds or pest animals, and provides a system of controls on noxious species.

Declared noxious weeds identified in the study area are listed in Appendix 1 (Table 7).

The proponent must take all reasonable steps to prevent the growth and spread of CaLP listed weeds within the study area during the construction and operation of the BESS. Vehicle and Machinery hygiene practices should be implemented to ensure weeds are not spread throughout or beyond the study area.

Further information is at <http://agriculture.vic.gov.au/agriculture/pests-diseases-and-weeds>

4.2.3 Planning and Environment Act 1987 (incl. Planning Schemes)

The *Planning and Environment Act 1987* controls the planning and development of land in Victoria, and provides for the development of planning schemes for all municipalities.

Of particular relevance to the development proposal are controls relating to the removal, destruction or lopping of native vegetation contained within the Pyrenees Planning Scheme (the Scheme), including permit requirements. The Scheme (Clause 73.01) defines 'native vegetation' as 'Plants that are indigenous to Victoria, including trees, shrubs, herbs, and grasses'. It is an objective of Clause 12.01-2 of the State Planning Policy Framework (Native Vegetation Management) that removal of native vegetation results in no net loss in the contribution made by native vegetation to Victoria's biodiversity.

Clause 52.17 (Native Vegetation) requires a planning permit to remove, destroy or lop native vegetation including some dead native vegetation subject to exemptions. Decision guidelines that must be considered by the referral or responsible authority are contained in Section 7 of the Guidelines, and referred to in Clause 52.17-4. Where native vegetation does not meet the definition of a patch or scattered tree as described in Section 3.1 there is no offset requirement under the Guidelines.

Native vegetation as defined in the Guidelines does not occur within the study area. As a result, it is unlikely that a planning permit under clause 52.17 is required to remove native vegetation.

The study area is not covered by any overlays relevant to biodiversity under the Scheme.

Victoria's Guidelines for the removal, destruction or lopping of native vegetation

The Guidelines are incorporated into the Victoria Planning Provisions and all planning schemes in Victoria (DELWP 2017a). The Guidelines replaced the previous incorporated document titled Permitted clearing of native vegetation – Biodiversity assessment guidelines (DEPI 2013) on 12 December 2017.

The purpose of the Guidelines is to guide how impacts to biodiversity should be considered when assessing a permit application to remove, destroy or lop native vegetation. The objective for the guidelines in Victoria is 'No net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation'.

The proposed development will not require the removal, destruction or loss of any patches of native vegetation or scattered trees. As such, native vegetation offsets will not be required.

4.2.4 *Environment Effects Act 1978*

The *Environment Effects Act 1978* establishes a process to assess the environmental impacts of a project. If applicable, the Act requires that an Environment Effects Statement (EES) be prepared by the proponent. The EES is submitted to the Minister for Planning and enables them to assess the potential environmental effects of the proposed development.

The general objective of the assessment process is to provide for the transparent, integrated and timely assessment of the environmental effects of projects capable of having a significant effect on the environment (DoTP 2023).

The *Ministerial Guidelines for Assessment of Environmental Effects under the Environment Effects Act 1978* (DTP 2023) provide a range of criteria that can be used to determine whether an EES may be required for a project.

The project is unlikely to trigger the biodiversity criteria outlined in the *Ministerial Guidelines for Assessment of Environmental Effects under the Environment Effects Act 1978* (DTP 2023). However, the decision as to whether an EES is required is ultimately at the discretion of the Minister for Planning.

4.2.5 *Environment Protection Act 2017: Environmental Reference Standards*

The *Environment Protection Act 2017* (EP Act) provides a legal framework for the systematic and strategic management of potential and realised environmental impacts. The *Environment Protection Act 2017*, the Environment Protection Regulations 2021 and Environment Reference Standards (ERS) introduced from 1 July 2021 provide a regulatory framework designed to prevent harm by eliminating or minimising risks of harm to human health and the environment.

Under the regulatory changes, SEPP (Waters) will not continue as a subordinate instrument under the EP Act, and its formal statutory role ended on 1 July 2021. Much of the content of SEPP (Waters) has been saved under the Environment Protection Transitional Regulations 2021 for a period of 2 years after the commencement of the Environment Protection Regulations 2021. As SEPP (Waters) contributes to the state of knowledge and provides guidance on compliance with the General Environmental Duty (GED), the policy remains relevant to the protection and management of Victoria's water environments, including surface waters, estuarine and marine waters and groundwaters.

While not being saved under the Environment Protection Transitional Regulations 2021, the following clauses of SEPP (Waters) applicable to the project remain relevant as they provide guidance for compliance with the GED under the *Environment Protection Act 2017*:

Clause 42 – Construction activities:

- Minimise soil erosion, land disturbance and discharge of sediment and other pollutants to surface waters
- Where construction activities impinge on surface waters, construction managers need to monitor affected surface waters to assess whether beneficial uses are being protected

Clause 45 – Native vegetation protection and rehabilitation:

- Minimise the removal of and rehabilitate native vegetation within or adjacent to surface waters

Impacts to surface water quality as a result of the project must not result in changes that exceed background levels and/or the water quality objectives specified to protect surface water uses and values.

To ensure that direct and indirect (e.g. runoff) impacts to surface water quality do not exceed the background levels and/or water quality objectives, it is recommended that a site-specific Constructional Environmental Management Plan is prepared and implemented, which includes all EPA approved erosion control measures. These temporary control measures should be inspected during rainfall events to ensure controls are able to prevent/minimize offsite discharges and longer term impacts.

Link to further information: <http://www.gazette.vic.gov.au/gazette/Gazettes2021/GG2021S245.pdf>

5 Victoria's Guidelines for the removal, destruction or lopping of native vegetation

The Guidelines set out and describe the application of Victoria's statewide policy in relation to assessing and compensating for the removal of native vegetation in order to achieve the objective of 'no net loss to biodiversity as a result of the removal, destruction or lopping of native vegetation' (DELWP 2017a).

This objective is to be achieved through Victoria's planning system using an assessment approach that relies on strategic planning and the permit and offset system. The key policy for achieving no net loss to biodiversity is the three-step approach of avoid, minimise and offset:

- **Avoid** the removal, destruction or lopping of native vegetation.
- **Minimise** impacts resulting from the removal, destruction or lopping of native vegetation that cannot be avoided.
- Provide an **offset** to compensate for the biodiversity impact from the removal, destruction or lopping of native vegetation.

Steps that have been taken during the design of the development to ensure that impacts on biodiversity from the removal of native vegetation have been minimised include:

- A development site that does not support patches of native vegetation or scattered trees was selected for the proposed BESS construction. As a result, impacts to vegetation as defined in the guidelines has been completely avoided by the development.

The Department of Energy, Environment and Climate Action provides biodiversity information tools to assist with determining the assessment pathway associated with the removal of native vegetation and the contribution that native vegetation within the study area makes to Victoria's biodiversity.

All planning permit applications to remove native vegetation are assigned to an assessment pathway determined by the extent and location of proposed native vegetation removal. The assessment pathway determines the information to be provided in a planning permit application and the decision guidelines that the responsible authority (e.g. Council) and/or DEECA as a referral authority will use to assess the permit application.

The biodiversity information tools have two components:

Site-based information

The site-based information is observable at a particular site. Biosis has collected the requisite site-based information for the assessment against the Guidelines.

Landscape scale information

Landscape scale information requires consideration of information beyond the site. This information is managed by DEECA and can be accessed via the NVR Map.

The following section summarises the results of the site-based assessment.

5.1 Proposed removal of native vegetation

The study area does not support any patches of native vegetation or scattered trees. As a result, no native vegetation (as defined in the Guidelines) is currently proposed to be removed, destroyed or lopped for the BESS construction. Additionally, no native vegetation offsets need to be secured for this construction given the avoidance of impacts to native vegetation (as defined in the Guidelines).

The proposed transmission line footprint was not properly surveyed as part of this assessment. It has been assumed that native vegetation is not being impacted in this location due to the quality of vegetation in the nearby areas (that were surveyed during this assessment) and an assessment of the site from the adjacent roadside (looking through the fence).

6 Key ecological values and recommendations

This section identifies the key ecological features of the study area, provides an outline of potential implications of proposed development on those values and includes recommendations to assist Acciona Energía in further minimising impacts on biodiversity during construction.

The primary measure to reduce impacts to biodiversity values within the study area is to avoid and minimise removal of native vegetation and terrestrial and aquatic habitat. The development currently fulfils this measure as no native vegetation (as defined in the Guidelines) is proposed to be removed, destroyed or lopped. Additional measures to reduce indirect impacts to biodiversity, can be implemented during construction.

A summary of potential implications of development of the study area and recommendations to minimise impacts during the **design phase** of the project is provided in Table 6.

Table 6 Summary of key ecological values, potential implications of developing the study area and recommendations to minimise ecological impacts during the design phase.

Ecological feature (Figure 2)	Implications of development	Recommendations
Native vegetation	No native vegetation as defined in the Guidelines is proposed to be removed, destroyed or lopped for the construction of the proposed BESS.	A patch of native vegetation has been mapped adjacent the impact area on the corner of the Sunraysia Highway and Troys Road. This patch of native vegetation will be retained and should be flagged during the construction period. Physical flagging/taping or fencing of the patch of vegetation will ensure that it is not incidentally impacted.
Threatened species and ecological communities	Removal of potential habitat for the FFG Act listed species Little Eagle. White-throated Needletail is unlikely to utilise terrestrial habitat within the study area and therefore will not be impacted by the proposed BESS construction. While some suitable habitat for Little Eagle occurs within the impact footprint, the proposed BESS is unlikely to result in a significant impact to this species.	N/A
Other habitat features	A creek/drainage line occurs to the south and east of the study area, draining into several dams on neighbouring properties.	A site specific Construction Environment Management Plan (CEMP) should be implemented to ensure that the construction and operation of the BESS does not cause impacts to the nearby waterway. For example, indirect impacts to the nearby waterway can be minimised by implementing sedimentation and erosion controls during construction.

Construction and post-construction management

Specific detail relating to preventing indirect impacts to aquatic values in the surrounding landscape should be addressed in a site-specific Construction Environmental Management Plan. This will include issues relating to contractors such as environmental inductions, drainage and sediment control.

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Appendices

Appendix 1 Flora

Abbreviations and symbols relevant to this Appendix.

Code	Meaning	Reference
National listings		
EX	Extinct	Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)
CR	Critically endangered	
EN	Endangered	
VU	Vulnerable	
PMST	Protected Matters Search Tool	
State listings		
x	Extinct	Victorian <i>Flora and Fauna Guarantee Act 1988</i> (FFG Act)
cr	Critically endangered	
e	Endangered	
v	Vulnerable	
t	Threatened	
P	Protected (public land only)	
Weed status (CaLP Act, DCCEEW Weeds of National Significance and DEECA Advisory List)		
SP	State prohibited species	Victorian <i>Catchment and Land Protection Act 1994</i> (CaLP Act)
RP	Regionally prohibited species	
RC	Regionally controlled species	
R	Restricted species	

Appendix 1.1 Flora species recorded from the study area

Table 7 Flora species recorded from the study area

Status	Scientific Name	Common Name
Native species		
	<i>Rytidosperma</i> spp.	Wallaby Grass
Introduced species		
	<i>Acetosella vulgaris</i>	Sheep Sorrel
	<i>Agrostis capillaris</i>	Brown-top Bent
	<i>Anthoxanthum odoratum</i>	Sweet Vernal-grass
	<i>Arctotheca calendula</i>	Cape Weed
	<i>Avena barbata</i>	Bearded Oat
	<i>Bromus diandrus</i>	Great Brome
	<i>Bromus hordeaceus</i>	Soft Brome

Status	Scientific Name	Common Name
	<i>Cerastium glomeratum</i> s.s.	Sticky Mouse-ear Chickweed
	<i>Dactylis glomerata</i>	Cocksfoot
	<i>Erodium</i> spp.	Heron's Bill
	<i>Holcus lanatus</i>	Yorkshire Fog
	<i>Hordeum marinum</i>	Sea Barley-grass
	<i>Hypochaeris radicata</i>	Flatweed
	<i>Lolium rigidum</i>	Wimmera Rye-grass
	<i>Phalaris aquatica</i>	Toowoomba Canary-grass
	<i>Plantago coronopus</i>	Buck's-horn Plantain
	<i>Rumex crispus</i>	Curled Dock
R	<i>Silybum marianum</i>	Variegated Thistle
	<i>Trifolium repens</i> var. <i>repens</i>	White Clover
	<i>Trifolium</i> spp.	Clover
	<i>Vulpia myuros</i>	Rat's-tail Fescue

Appendix 1.2 Listed flora species

The following table includes threatened flora species that have potential to occur within the study area, sourced from the VBA and PMST (accessed on 15 November 2024). Where years are specified for the most recent database records, these refer to records from the VBA unless otherwise specified. Where no year is specified, the PMST predicts the species has potential to occur. Some flora habitat descriptions are reproduced from the Royal Botanic Gardens Victoria (VicFlora 2024) with permission.

Table 8 Threatened flora species recorded or predicted to occur within 5 km of the study area

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
National significance								
<i>Amphibromus fluitans</i>	River Swamp Wallaby-grass	VU			PMST	Swampy areas, mainly along the Murray River between Wodonga and Echuca with scattered records from southern Victoria.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Caladenia concolor</i>	Crimson Spider-orchid	VU	e		PMST	Open, grassy understorey in Box Ironbark and dry foothill forests.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Caladenia ornata</i>	Ornate Pink-fingers	VU	e		PMST	Heathy and grassy woodlands.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
								agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Caladenia tensa</i>	Rigid Spider-orchid	EN			PMST	Woodland dominated by Yellow Gum and Cypress-pine, heathy woodland and Mallee.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Caladenia versicolor</i>	Candy Spider-orchid	VU	e		PMST	Herb-rich Yellow Box woodland on sandy loam soils.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Dianella amoena</i>	Matted Flax-lily	EN	cr		PMST	Lowland grassland and grassy woodland, on well-drained to seasonally waterlogged fertile sandy loam soils to heavy cracking clays.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Dodonaea procumbens</i>	Trailing Hop-bush	VU			PMST	Sandy or clay soils in low-lying, winter-wet areas in grasslands,	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
						woodlands, and low-open forest.		area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Glycine latrobeana</i>	Clover Glycine	VU	v		PMST	Grasslands and grassy woodlands, particularly those dominated by Kangaroo Grass.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Lachnagrostis adamsonii</i>	Adamson's Blown-grass	EN	e		PMST	Low-lying, seasonally wet or swampy areas of plains communities, often in slightly saline conditions.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Lepidium aschersonii</i>	Spiny Peppercress	VU	e		PMST	Heavy clay soils near salt lakes on the volcanic plains; disjunct records near Lake Omeo.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
<i>Lepidium hyssopifolium</i>	Basalt Pepper-cress	EN			PMST	Basalt plains grassland and woodland communities.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Leucochrysum albicans subsp. tricolor</i>	White Sunray	EN	e		PMST	Grasslands of the Victorian Volcanic Plains, primarily on acidic clay soils derived from basalt, with occasional occurrences on adjacent sedimentary, sandy-clay soils.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Myriophyllum porcatum</i>	Ridged Water-milfoil	VU	cr		PMST	Ephemeral wetlands, rock pools, farm dams and watercourse shallows.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Pimelea spinescens subsp. spinescens</i>	Spiny Rice-flower	CR	cr		PMST	Primarily grasslands featuring a moderate diversity of other native species and inter-tussock spaces, although also recorded in grassland dominated by introduced perennial grasses.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
								suitability of habitat within the study area significantly.
<i>Poa sallacustris</i>	Salt-lake Tussock-grass	VU	cr		PMST	Grasslands and herblands on the sloping verges of saline lakes.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Prasophyllum suaveolens</i>	Fragrant Leek-orchid	EN	cr		PMST	Open, species rich grasslands dominated by Themeda triandra on poorly draining red-brown soils in western Victoria.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Prasophyllum validum</i>	Sturdy Leek-orchid	VU			PMST	Apparently endemic to Victoria where scattered across northern, north-eastern (Chiltern area) and western open forest and woodland communities on stony and sandy soils.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Pterostylis chlorogramma</i>	Green-striped Greenhood	VU	e		PMST	Heathy woodland; more specific habitat requirements are poorly known.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
								and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Rutidosia leptorhynchoidea</i>	Button Wrinklewort	EN	e		PMST	Higher quality Plains Grassland and Grassy Woodland in Western Victoria, particularly those with fertile soil and light timber cover.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Senecio behrianus</i>	Stiff Groundsel	EN	cr		PMST	Specific habitat requirements of this species are poorly understood, but they are known to occur in seasonally inundated habitats on clay soils.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Senecio macrocarpus</i>	Large-headed Fireweed	VU	cr		PMST	Grassland, shrubland and woodland habitats on heavy soils subject to waterlogging and/or drought conditions in summer.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Senecio psilocarpus</i>	Swamp Fireweed	VU			PMST	Seasonally inundated herb-rich swamps, growing on peaty soils or volcanic clays.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
								agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Swainsona murrayana</i>	Slender Darling-pea	VU	e		PMST	Around lakes and on flats that are subject to seasonal inundation.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Thelymitra matthewsii</i>	Spiral Sun-orchid	EN	e		PMST	Typically on well-drained soils on slightly elevated sites, but also on coastal sandy flats. Often in open situations following disturbance.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Thelymitra orientalis</i>	Slender Plum-orchid	CR	cr		PMST	Grows in damp heathy flats and seepage areas usually in peaty white sands.	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
<i>Xerochrysum palustre</i>	Swamp Everlasting	VU	cr		PMST	Sedge-swamps and shallow freshwater marshes and	Negligible	No recent or historical records within 10 km. No patches of native vegetation recorded within the study

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
						swamps in lowlands, on black cracking clay soils.		area. Historical disturbance for agriculture (such as rock removal and cropping) has reduced the suitability of habitat within the study area significantly.
State significance								
<i>Amphibromus pithogastrus</i>	Plump Swamp Wallaby-grass		cr	1990		Seasonally damp depressions in grassland or grassy wetland.	Low	Grassland and grassy wetland habitat does not occur within the study area. Any small depressions throughout have been heavily degraded by cattle grazing and cropping.
<i>Dianella tarda</i>	Late-flower Flax-lily		cr	2012		Heavy soils in grassy woodland environments dominated by River Red-gum Eucalyptus camaldulensis and Yellow Box E. melliodora.	Low	Grassy woodland vegetation does not occur within the study area. Disturbance for agriculture likely to have reduced the suitability of habitat significantly.
<i>Eucalyptus yarraensis</i>	Yarra Gum		cr	2008		Valley flats and along stream on soils subject to periodic inundation or waterlogging.	Negligible	No Eucalypts recorded within the study area or in the surrounding roadsides.
<i>Melaleuca armillaris subsp. armillaris</i>	Giant Honey-myrtle		e	2008		Near coastal heath/scrub, rocky coast and foothill outcrops.	N/A	Any records of this species within 10 km are likely to have been planted and occur well outside the natural range of the species.
<i>Pterostylis conferta</i>	Leprechaun Greenhood		cr	1964		Kangaroo Grass Themeda triandra dominated grasslands on shallow, heavy clay soils on stony rises.	Negligible	Species unlikely to occur within the study area due to historical disturbance for agriculture. No native grassland patches remain to provide suitable habitat.

Appendix 1.3 Threatened ecological communities

The following table includes threatened ecological communities that have potential to occur within the project area, compiled with reference to characteristics of FFG Act threatened communities (DEECA 2023) and predictive output from the PMST (accessed on 15th November 2024).

Table 9 Threatened ecological communities predicted to occur within 5 km of the project area.

Ecological community	Status	Comments
National significance		
Grassy Eucalypt Woodland of the Victorian Volcanic Plain	Critically Endangered	No indigenous Eucalypts <i>Eucalyptus</i> spp. or grasses occur within the study area. As a result, this community is not present.
Grey Box (<i>Eucalyptus microcarpa</i>) Grassy Woodlands and Derived Native Grasslands of South-eastern Australia	Endangered	Grey Box <i>Eucalyptus microcarpa</i> (a key diagnostic species) does not occur within the study area. No additional native vegetation is present that could represent the derived form of this community. As a result, the community is not present.
Natural Temperate Grassland of the Victorian Volcanic Plain	Critically Endangered	No grassland vegetation occurs within the study area. As a result, the community is not present.
Seasonal Herbaceous Wetlands (Freshwater) of the Temperate Lowland Plains	Critically Endangered	Wetland vegetation (or an area where herb dominated wetland vegetation may occur following high rainfall) does not occur within the study area. As a result, this community is not present.
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	Critically Endangered	The key diagnostic canopy species do not occur within the study area. This community is not present.
State significance		
Creekline Grassy Woodland (Goldfields) Community	Threatened	No patches of native vegetation occur within the study area. As a result, this community is not present.
Grey Box - Buloke Grassy Woodland Community	Threatened	No patches of native vegetation occur within the study area. As a result, this community is not present.
Western (Basalt) Plains Grasslands Community	Threatened	No patches of native vegetation occur within the study area. As a result, this community is not present.
Western Basalt Plains (River Red Gum) Grassy Woodland Floristic Community 55-04	Threatened	No patches of native vegetation occur within the study area. As a result, this community is not present.

Appendix 2 Fauna

Abbreviations and symbols relevant to this Appendix:

Code	Meaning	Reference
National listings		
EX	Extinct	Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)
CR	Critically endangered	
EN	Endangered	
VU	Vulnerable	
CD	Conservation dependent	
PMST	Protected Matters Search Tool	
State listings		
x	Extinct	Victorian <i>Flora and Fauna Guarantee Act 1988</i> (FFG Act)
cr	Critically endangered	
e	Endangered	
v	Vulnerable	
t	Threatened	
P	Protected (fish only)	
PS	Declared pest animal	Victorian <i>Catchment and Land Protection Act 1994</i> (CaLP Act)
N	Declared noxious aquatic species	<i>Victorian Fisheries Act 1995</i>

Appendix 2.1 Listed fauna species

The following table includes a list of threatened fauna species that have potential to occur within the study area, sourced from the VBA and PMST (accessed on 15 November 2024). Where years are specified for the most recent database records, these refer to records from the VBA unless otherwise specified. Where no year is specified, the PMST predicts the species has potential to occur.

Table 10 Threatened fauna species recorded or predicted to occur within 5 km of the study area

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
National significance								
<i>Gallinago hardwickii</i>	Latham's Snipe	VU		2017		Migrates to Australia from July to April. Prefers open, well-vegetated, permanent and ephemeral freshwater wetlands, with tussock grasslands, reeds and rushes, tea-tree scrub, woodlands and forests nearby. Can occur on the edges of creeks and rivers, river-pools and floodplains.	Negligible	No suitable wetland habitat within the study area.
<i>Falco hypoleucos</i>	Grey Falcon	VU	v		PMST	Arid and semi-arid lightly timbered plains and Acacia scrub.	Negligible	No local records. Study area is outside the species usual range. Species is largely restricted to northern arid and semi-arid areas.
<i>Lathamus discolor</i>	Swift Parrot	CR	cr	1897		Forests, woodlands and well-treed urban areas, especially those supporting nectar-producing tree species.	Negligible	No recent local records. No suitable foraging habitat in flowering trees within the study area.
<i>Hirundapus caudacutus</i>	White-throated Needletail	VU	v		PMST	Almost exclusively aerial within Australia, occurring over most types of habitat, particularly wooded areas.	High	Widespread predominantly aerial species. Rarely utilises terrestrial habitat. Unlikely

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
								to be impacted by terrestrial developments that don't pose a collision risk.
<i>Tringa nebularia</i>	Common Greenshank	EN	e		PMST	Ephemeral and permanent inland and sheltered coastal wetlands.	Negligible	No suitable wetland habitat within the study area.
<i>Calidris ferruginea</i>	Curlew Sandpiper	CR	cr		PMST	Found in coastal bays and inlets throughout Australia, but also found in freshwater and brackish wetlands and open muddy shores.	Negligible	No suitable wetland habitat within the study area.
<i>Calidris acuminata</i>	Sharp-tailed Sandpiper	VU		1980		Prefers muddy edges of shallow fresh or brackish wetlands with inundated or emergent low vegetation. Occasionally use flooded paddocks and other ephemeral wetlands.	Low	No recent local records. No suitable wetland habitat within the study area. Species may rarely utilise local flooded paddocks as marginal foraging habitat, but is unlikely to rely on the study area as regular habitat.
<i>Aphelocephala leucopsis</i>	Southern Whiteface	VU			PMST	Open woodlands and shrublands where there is an understorey of grasses or shrubs, or both.	Negligible	No local records. No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Grantiella picta</i>	Painted Honeyeater	VU	v		PMST	Dry open woodlands and forests.	Negligible	No local records. No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
<i>Stagonopleura guttata</i>	Diamond Firetail	VU	v	2019		Open forests and woodlands with a grassy ground layer.	Negligible	No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Climacteris picumnus victoriae</i>	Brown Treecreeper (south-eastern)	VU		2020		Open eucalypt forests, woodlands and Mallee, often where there are stands of dead trees.	Negligible	No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Dasyurus maculatus maculatus</i>	Spot-tailed Quoll	EN	e	2006		Rainforest and wet and dry sclerophyll forests and woodlands.	Negligible	No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Dasyurus viverrinus</i>	Eastern Quoll	EN		1882		The Eastern Quoll is a medium-sized carnivorous marsupial that once occupied a broad range of forest, woodland and grassland habitats in Victoria. The species is now restricted to Tasmania and is considered to be extinct from mainland Australia.	Negligible	No recent local records. No suitable habitat. Species is considered to be extinct from Mainland Australia.
<i>Aprasia parapulchella</i>	Pink-tailed Worm-Lizard	VU	e		PMST	Woodland and grassland with partially buried rocks.	Negligible	No local records. No suitable rocky habitat. Species distribution within Victoria is limited to greater-Bendigo region.
<i>Delma impar</i>	Striped Legless Lizard	VU	e		PMST	Natural temperate grassland, grassy woodland and exotic grassland.	Low	No local records. No suitable grassland habitat.

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
<i>Litoria raniformis</i>	Growling Grass Frog	VU	v	1788		Still or slow-flowing waterbodies and surrounding terrestrial vegetation.	Low	No recent local records. No suitable wetland habitat within the study area. Species is highly mobile and if present in wetlands and waterways within the local area, may occasionally pass through the study area during periods of inundation, however, species is unlikely to utilise the study area as habitat.
<i>Synemon plana</i>	Golden Sun Moth	VU	v		PMST	Natural temperate grassland, grassy woodland and pasture supporting spear grasses and wallaby grasses and exotic grassland dominated by Chilean needle grass.	Negligible	No local records. No suitable feed grasses recorded within the study area.
State significance								
<i>Burhinus grallarius</i>	Bush Stone-curlew		cr	1967		Open woodland, treed farmland.	Negligible	No recent local records. No suitable woodland habitat within the study area. Species largely absent from southern Victoria due to habitat loss and increase in predation from pest animals.
<i>Antigone rubicunda</i>	Brolga		e	2023		Shallow freshwater and brackish wetlands, crops, grassland and pasture.	Low	No suitable wetland habitat within the study area. No records at wetlands within close proximity to the study area.

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
<i>Ardea intermedia plumifera</i>	Plumed Egret		cr	1975		Densely-vegetated freshwater wetlands including lakes, swamps and billabongs. Breeds in trees standing in water.	Negligible	No suitable wetland habitat within the study area.
<i>Spatula rhynchotis</i>	Australasian Shoveler		v	1989		Variety of wetlands, with a preference for large, permanent, freshwater lakes/swamps with dense fringing vegetation.	Negligible	No suitable wetland habitat within the study area.
<i>Oxyura australis</i>	Blue-billed Duck		v	1980		Open or densely vegetated wetlands.	Negligible	No suitable wetland habitat within the study area.
<i>Biziura lobata</i>	Musk Duck		v	2009		Deep, permanent freshwater wetlands with areas of open water and patches of dense aquatic vegetation.	Negligible	No suitable wetland habitat within the study area.
<i>Hieraaetus morphnoides</i>	Little Eagle		v	2009		Open Eucalypt forest, woodland and open woodland, often extending into arid zones.	Medium	Widespread but locally uncommon species. May occasionally fly over the local area and hunt European Rabbit in open paddocks. Unlikely to make regular use of the study area or be notably impacted by the proposed works.
<i>Ninox strenua</i>	Powerful Owl		v	2000		Eucalypt forests and woodlands, well-treed urban areas.	Low	Negligible suitable habitat. Species is largely restricted to larger patches of woodland and forest, and well-treed urban areas supporting arboreal prey. Species is known to roost in

Scientific name	Common name	Listing status		Most recent database record	Other records	Habitat description	Likely occurrence in study area	Rationale for likelihood ranking
		EPBC	FFG					
<i>Actitis hypoleucos</i>								large conifers, including planted pines, but is unlikely to inhabit cleared agricultural landscapes.
	Common Sandpiper		v		PMST	Migrates to Australia from August to March. Prefers coastal and inland wetlands with generally narrow muddy margins.	Negligible	No suitable wetland habitat within the study area.
<i>Pyrholaemus sagittatus</i>	Speckled Warbler		e	1976		Eucalypt woodland with rocky gullies, ridges, tussock grasses and a sparse shrub understorey.	Negligible	No recent local records. No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Phascogale tapoatafa</i>	Brush-tailed Phascogale		v	2001		Drier sclerophyll forests and woodlands.	Negligible	No suitable woodland or forest habitat. Species is unlikely to utilise open paddocks or planted pine windbreaks.
<i>Ornithorhynchus anatinus</i>	Platypus		v	2021		A variety of freshwater bodies, particularly with stable banks and shallow waters.	Negligible	No suitable wetland habitat within the study area.
<i>Pogona barbata</i>	Bearded Dragon		v	1991		Woodlands, forests and heathlands with abundant cover of coarse woody debris.	Low	Species rarely recorded within the region. No woodland, forest or heathland with woody debris.

Appendix 2.2 Migratory species (EPBC Act listed)

Table 11 Migratory fauna species recorded or predicted to occur within 5 km of the study area

Scientific name	Common name	Most recent record
<i>Gallinago hardwickii</i>	Latham's Snipe	2017
<i>Plegadis falcinellus</i>	Glossy Ibis	1980
<i>Hirundapus caudacutus</i>	White-throated Needletail	
<i>Apus pacificus</i>	Fork-tailed Swift	
<i>Actitis hypoleucos</i>	Common Sandpiper	
<i>Tringa nebularia</i>	Common Greenshank	
<i>Calidris ferruginea</i>	Curlew Sandpiper	
<i>Calidris ruficollis</i>	Red-necked Stint	1997
<i>Calidris acuminata</i>	Sharp-tailed Sandpiper	1980
<i>Calidris melanotos</i>	Pectoral Sandpiper	

Appendix 3 Photos of the study area



Photo 1 The site is dominated by predominantly introduced vegetation, supporting only a minor cover of scattered native species in the understorey. Photo taken facing east.



Photo 2 A watering point for stock occurs within the disturbed paddock. Vegetation surrounding this watering point is highly degraded due to the high traffic from stock.



Photo 3 Water is likely to sit in some areas of the study area, however these locations are heavily degraded by grazing with perennial grassy weeds dominating the area and the soil heavily disturbed by stock. Photo taken facing south-west.



Photo 4 Location of the proposed site entrance/exit on Gordons Road. Photo taken facing east on 19 June 2026.



Photo 5 Impacts at the current entrance to the property will extend to the opposite roadside to account for turning of large vehicles. This roadside is highly disturbed. Photo taken facing north on 19 June 2026.



Photo 6 Demonstration of vegetation quality through the fence at the Waubra Terminal Station. A detailed assessment was not completed within the terminal station, however an assessment of vegetation quality from the roadside suggests native species cover is low, if present. Photo taken facing north on 19 June 2026.



Photo 7 Vegetation within the proposed impact footprint on the corner of Sunraysia Highway and Troys Road is of a low quality, dominated by introduced grassy weeds. Photo take facing east on 19 June 2026.



Photo 8 A patch of native vegetation (recruiting Blackwoods) occurs near the proposed impacts on the corner of Sunraysia Highway and Troys Road. Photo taken facing north-west on 19 June 2026.

