

Bushfire Assessment Report



PROPERTY:

CO₂ Processing Plant

Lot 143 DP1069758, Lot 3 DP3885, Lot 1 DP605942, Lots 5 & 6 DP544730 and Lot A
DP384559, Bolong Road, Bomaderry

Prepared by:

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Owner & Principal Consultant

BPAD Accredited Practitioner – 46547 (Level 3)

Reference: Shoal 259

Date: 29th January 2026

Version 2

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1 Introduction

The Bushfire Assessment Report Has been Prepared for Allen Price, on behalf of Air Liquide Australia Solutions Pty Ltd and Manildra Energy Australia Pty Ltd to accompany an Environmental Impact Statement (EIS) for the construction of a CO₂ processing plant located at Lot 143 DP1069758, Lot 3 DP3885, Lot 1 DP605942, Lots 5 & 6 DP544730 and Lot A DP384559, Bolong Road, Bomaderry.

In accordance with Shoalhaven Councils bushfire prone land map the subject property is mapped as being bushfire prone land. The proposed development is considered to be State Significant Development on Bushfire Prone Land and is required to be assessed under the relevant provisions of Part 4 Division 4.7 of the Environmental Planning and Assessment Act 1979.

Planning Secretary's Environmental Assessment Requirements (**SEARs**) where issued for the development on 4th April 2025 under SSD-80824235. in accordance with the SEARs, the EIS must include a Bushfire Assessment Report that addresses the aims and objectives of Planning for Bushfire Protection 2019.

Figure 1 shows an extract of Shoalhaven Councils Bushfire Prone Land Map showing the subject site outlined in Blue.



Figure 1: Extract of Shoalhaven Council's Bushfire Prone Land Map, subject site outlined in blue.

1.1 Proposal

The proposal involves the construction of a CO₂ processing plant. The proposed plant will capture and purify CO₂ gas generated as a by-product of Shoalhaven Starches' ethanol production and will process it into food and beverage-grade Liquid Carbon Dioxide (LiCO₂).

In addition to the CO₂ processing facility, several ancillary works will be required to facilitate the transfer of feedstock from fermentation tanks at Manildra to the processing plant via dedicated piping infrastructure.

The facility will be capable of processing up to 100,000 tonnes per annum of CO₂-rich gas produced as a by-product of Shoalhaven Starches' operations.

An extract of the Site Plan prepared by Babbage is provided in Figure 2. For further detail see Annexure 1 Site Plan.

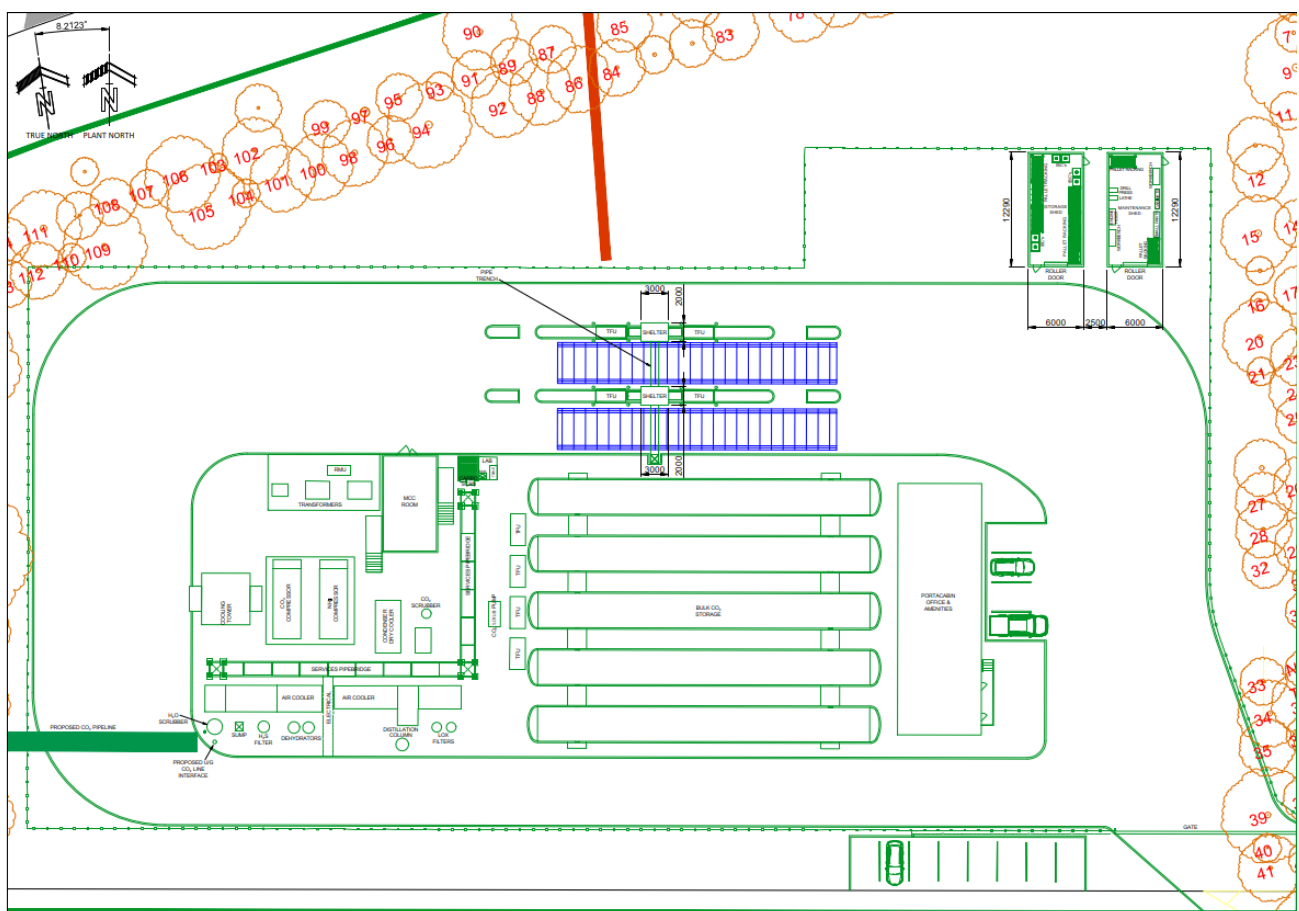


Figure 2: Extract of site plan.

1.2 Existing Site Conditions

The proposed processing plant will be located on the former Australian Pulp and Paper Mill site and is occupied by a variety of existing infrastructure. The Australian Pulp and Paper Mill site has a large paddock located on the western side, this area will form the location of the processing facility.

In addition to this area the development will utilise land for the purpose of piping CO₂ from Manildra to the facility, the majority of these sites are cleared paddocks.

The site and surrounding properties are mostly cleared of vegetation which reflects the historic and ongoing Agricultural and industrial uses of the area. The site is predominantly cleared of vegetation with the exemption of vegetation screening that runs around the perimeter of the paddock.

Figure 3 shows an aerial photo of the subject site sourced from Near maps.



Figure 3: Aerial photo showing the subject site marked in blue.



Figure 4: Drone image looking south over the subject site.

2 Bushfire Hazard Assessment

This Bushfire hazard Assessment has been undertaken for the proposed development in accordance with the Site Assessment Methodology detailed in Appendix 1 of Planning for Bushfire Protection 2019. Results are based a site inspection and a review of best available Geographic Information System data.

2.1 Vegetation Classification

The bushfire hazardous vegetation surrounding the subject site has been assessed to a distance of 140 metres and the vegetation forming the greatest hazard for each elevation has been assessed.

The site and surrounding properties are generally cleared of vegetation. A row of screening vegetation remains on the subject site; however, this area lacks an understorey and is periodically maintained. The surrounding paddocks have the potential to present a grassland fire hazard to the proposed development. Overall, the predominant bushfire threat has been identified as grassland to the north, south and west.

2.2 Slope Assessment

The effective slope has been assessed surrounding the development to a distance of 100 metres (or greater). The effective slope is the slope of the land under the classified vegetation and has influence on the rate of spread and intensity of an approaching fire. The slope assessment has been undertaken using NSW Government LiDAR Data.

The site and surrounding properties are generally level. The slope considered to most significantly influence the fire behaviour has been determined as follows;

- North, South and West – 0° to Upslope.

2.3 Fire Weather Areas

The site is located within the Shoalhaven Council local government area which is part of the Shoalhaven/Illawarra Fire Weather District and has and FDI of 100.

2.4 Assessing the Hazard

The bushfire hazard has been evaluated for each elevation of the proposed development in accordance with the assessment methodology of Planning for Bushfire Protection. Infill development is required to demonstrate compliance with the provisions for Asset Protection Zones detailed in Section 7.4 of Planning for Bushfire Protection 2019. A breakdown of the hazard assessment undertaken for the proposed development is detailed in Table 1 below.

Table 1: Summary of hazard assessment undertaken for the proposed development. Asset Protection Zones and corresponding BAL ratings have been determined in accordance with Table A1.12.5 of Planning for Bushfire Protection 2019.

Elevation	Vegetation Type	Effective Slope	Existing APZ	Recommended APZ	BAL Rating	Comments
North	Grassland	0° to Upslope	29m	To the property Boundary	BAL 12.5	8m of existing managed land located within the subject site followed by manged land contained within the road reserve of Bolong Rd.
South and West	Grassland	0° to Upslope	(S) >100m (W) 54m	10m	BAL 29	Existing manged land within the subject site
East	Managed land	-	>100m	-	BAL LOW	

3 Bushfire Protection Measures

Residential Infill Development in bushfire prone areas are required to demonstrate compliance with the relevant Bushfire Protection Measures detailed in Section 7 '*Residential Infill Development*' of Planning for Bushfire Protection 2019.

The specific objectives for infill development as detailed in Section 7.3 of PBP 2019 area as follows;

- *Provide a defensible space to enable unimpeded access for firefighting around the building;*
- *Provide better bush fire outcomes on a redevelopment site than currently exists, commensurate with the scale of works proposed;*
- *Design and construct buildings commensurate with the bush fire risk;*
- *Provide access, services and landscaping to aid firefighting operations;*
- *Not impose an increased bush fire management and maintenance responsibility on adjoining land owners; and*
- *Increase the level of bush fire protection to existing dwellings based on the scale of the proposed work and level of bush fire building risk.*

Commercial and Industrial Development (PBP Section 8.3.10)

Commercial and industrial development located on bush fire prone land (BFPL) is subject to the requirements of Section 4.14 of the Environmental Planning and Assessment Act 1979 (EP&A Act) where a manager's residence forms part of the proposal. In instances where there is no residential component, such development is instead considered against the aims and objectives of Planning for Bushfire Protection 2019 (PBP), as outlined in Chapter 1.

An appropriate package of bush fire protection measures (BPMs) should be developed, proportional to the assessed level of bushfire risk to the development. The scale of the proposed development and the anticipated number of occupants will directly inform the extent and nature of the recommended BPMs.

The provisions of Chapter 7 of PBP 2019 provide a basis for the preparation of suitable bush fire protection measures. Each proposal is assessed on its individual merits, with site-specific factors considered in determining an appropriate response to the identified bushfire risk.

3.1 Asset Protection Zones

The Acceptable Solutions and Performance Criteria for Asset Protection Zones for Residential Infill development are detailed in Section 7.4 of Planning for Bushfire Protection 2019. The intent of measures is to minimise the risk of bush fire attack and provide protection for emergency services personnel, residents and others assisting firefighting activities. The Acceptable Solution and Performance Criteria for Asset Protection Zones for Residential infill development are summarised in Table 2 below.

Table 2: Acceptable Solutions and Performance Criteria for Asset Protection Zones for Residential Infill Development as detailed in Section 7.4 of Planning for Bushfire Protection 2019.

	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	COMPLIANCE
ASSET PROTECTION ZONES	- APZs are provided commensurate with the construction of the building; and - A defensible space is provided.	- APZs are provided in accordance with Tables A1.12.2 and A1.12.3 based on the FFDI.	The proposed development can support the Asset Protection Zones required to achieve BAL 29 or lower.
	- APZs are managed and maintained to prevent the spread of a fire to the building	- APZs are managed in accordance with the requirements of Appendix 4.	The APZs will have no problem meeting the provisions of Appendix 4.
	- The APZs is provided in perpetuity.	- APZs are wholly within the boundaries of the development site	The proposed APZs are located wholly within the subject site and formed road reserve.
	- APZ maintenance is practical, soil stability is not compromised and the potential for crown fires is minimised.	- APZs are located on lands with a slope less than 18 degrees.	APZs will not be located on land with slopes >18°.
LANDSCAPING	- Landscaping is designed and managed to minimise flame contact and radiant heat to buildings, and the potential for wind-driven embers to cause ignitions.	- Compliance with the NSW RFS 'Asset protection zone standards' (see Appendix 4); - A clear area of low-cut lawn or pavement is maintained adjacent to the house; - Fencing is constructed in accordance with section 7.6; and - Trees and shrubs are located so that: - o the branches will not overhang the roof; - o the tree canopy is not continuous; and - o any proposed windbreak is located on the elevation from which fires are likely to approach.	Future landscaping and fencing can comply with the acceptable solutions.

Recommendation

- From the commencement of building works and in perpetuity, the property around the development to a distance of 10 metres (or the property boundary, whichever comes first) shall be maintained as an inner protection area in accordance with Appendix 4.1.1 of Planning for Bush Fire Protection 2019:

When establishing and maintaining an inner protection area, the following requirements apply:

- o tree canopy cover should be less than 15% at maturity;
- o trees at maturity should not touch or overhang the building;
- o lower limbs should be removed up to a height of 2 m above the ground;
- o tree canopies should be separated by 2 to 5 m;

- preference should be given to smooth-barked and evergreen trees;
- large discontinuities or gaps in the shrubs layer should be provided to slow down or break the progress of fire towards buildings;
- shrubs should not be located under trees;
- shrubs should not form more than 10% ground cover;
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- grass should be kept mown (as a guide, grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed regularly.

3.2 Construction

The appropriate design and construction of buildings enhance their survivability from bush fires. Construction measures should not be applied as a stand-alone mitigation solution but should form part of a suite of Bushfire Protection Measures. This should also include Asset Protection Zones, appropriate access, water supply and landscaping.

The NCC does not provide for any bush fire specific performance requirements for these particular classes of buildings. As such AS 3959 and the NASH Standard are not considered as a set of Deemed to Satisfy provisions, however compliance with AS 3959 and the NASH Standard can be considered when meeting the aims and objectives of PBP.

Due to the class of buildings and the low inherent bushfire risk associated with the site, there are no recommendations relating to bushfire construction.

3.3 Access

The intent of measures is to provide safe operational access to structures and water supply for emergency services, while residents are seeking to evacuate from an area. Table 7.4a of Planning for Bushfire Protection 2019 outlines the Performance Criteria and Acceptable Solutions for access for residential Infill development under which the following applies;

Access to the site comes Bolong Rd which is a sealed public road maintained by Council. The facility will accommodate large trucks onsite and a loop road is provided through the facility. The proposed road design will be over and above that of the provisions for property access.

Table 3 outlines the performance criteria and acceptable solutions for Property Access Roads in accordance with Table 7.4a of Planning for Bushfire Protection 2019.

Table 3: Performance criteria and acceptable solutions for Property Access Roads for Infill development.

PERFORMANCE CRITERIA		ACCEPTABLE SOLUTIONS
PROPERTY ACCESS	firefighting vehicles can access the dwelling and exit the property safely.	- There are no specific access requirements in an urban area where an unobstructed path (no greater than 70m) is provided between the most distant external part of the proposed dwelling and the nearest part of the public access road (where the road speed limit is not greater than 70kph) that supports the operational use of emergency firefighting vehicles.

PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS
	In circumstances where this cannot occur, the following requirements apply: - minimum 4m carriageway width; - in forest, woodland and heath situations, rural property access roads have passing bays every 200m that are 20m long by 2m wide, making a minimum trafficable width of 6m at the passing bay; - a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches; - provide a suitable turning area in accordance with Appendix 3; - curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress; - the minimum distance between inner and outer curves is 6m; - the crossfall is not more than 10 degrees; - maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads and - a development comprising more than three dwellings has access by dedication of a road and not by right of way. Note: Some short constrictions in the access may be accepted where they are not less than 3.5m wide, extend for no more than 30m and where the obstruction cannot be reasonably avoided or removed. The gradients applicable to public roads also apply to community style development property access roads in addition to the above.

Recommendation

- If not already constructed to a higher standard, access shall comply with the following provisions for Property access roads, in accordance with of Table 7.4a of *Planning for Bush Fire Protection 2019*:
 - property access roads are two-wheel drive, all-weather roads;
 - the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges and causeways clearly, indicate load rating.
 - there is suitable access for a Category 1 fire appliance to within 4m of the static water supply where no reticulated supply is available;
 - minimum 4m carriageway width;
 - a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches;
 - property access must provide a suitable turning area in accordance with Appendix 3;
 - curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress;

- the minimum distance between inner and outer curves is 6m;
- the cross fall is not more than 10 degrees;
- maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads.

3.4 Services – Water Electricity and Gas

The intent of measures is to provide adequate services of water for the protection of buildings during and after the passage of a bush fire, and to locate gas and electricity so as not to contribute to the risk of fire to a building.

An adequate supply of water is essential for firefighting purposes. In addition, gas and electricity should be located so as not to contribute to the risk of fire or impede the firefighting effort. The Performance Criteria and Acceptable Solutions for Residential Infill Development are detailed in Section 7.4 of Planning for Bushfire Protection 2019 and are detailed in Table 4 below.

Table 4: Performance criteria and acceptable solutions for water, electricity and gas services for residential Infill Development in accordance with Table 7.4a of Planning for Bushfire Protection 2019.

	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	COMPLIANCE
WATER SUPPLIES	- An adequate water supply is provided for firefighting purposes	- Reticulated water is to be provided to the development, where available; and - A static water supply is provided where no reticulated water is available.	The site is connected to reticulated water. Hydrants will need to comply with the acceptable solutions.
	- Water supplies are located at regular intervals; and - The water supply is accessible and reliable for firefighting operations.	- Fire hydrant spacing, design and sizing comply with the relevant clauses of AS 2419.1:2005; - Hydrants are not located within any road carriageway; and - Reticulated water supply to urban subdivisions uses a ring main system for areas with perimeter roads.	Hydrants shall be provided meeting the acceptable solutions.
	- Flows and pressure are appropriate.	- Fire hydrant flows and pressures comply with the relevant clauses of AS 2419.1:2005.	Hydrant flows and pressures shall comply with the acceptable solutions.
	- The integrity of the water supply is maintained.	- all above-ground water service pipes external to the building are metal, including and up to any taps.	Above ground pipes will need to be metal.

	PERFORMANCE CRITERIA	ACCEPTABLE SOLUTIONS	COMPLIANCE
ELECTRICITY SERVICES	- Location of electricity services limits the possibility of ignition of surrounding bush land or the fabric of buildings.	- Where practicable, electrical transmission lines are underground; and - Where overhead, electrical transmission lines are proposed as follows: ○ Lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas; and ○ No part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines	The site is serviced by existing above ground powerlines. The augmentation of that service should have no problem complying with the acceptable solutions.
GAS SERVICES	- Location and design of gas services will not lead to ignition of surrounding bushland or the fabric of buildings.	- Reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used; - All fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side; - Connections to and from gas cylinders are metal; - Polymer sheathed flexible gas supply lines are not used; and - Above-ground gas service pipes are metal, including and up to any outlets.	The site does not have access to reticulated gas. There is no reason why the future connection to gas services cannot comply with the acceptable solutions.

Recommendation

- The provision of water, electricity and gas must comply with the following in accordance with Table 7.4a of *Planning for Bush Fire Protection 2019*:
 - reticulated water is to be provided to the development,
 - all above-ground water service pipes external to the building are metal, including and up to any taps,
 - where practicable, electrical transmission lines are underground,
 - where overhead, electrical transmission lines are proposed as follows:
 - lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas, and
 - no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.
 - reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used,

- all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side,
- connections to and from gas cylinders are metal,
- polymer-sheathed flexible gas supply lines are not used, and
- above-ground gas service pipes are metal, including and up to any outlets.

4 Conclusion and Recommendations

The Bushfire Assessment Report Has been Prepared for Allen Price, on behalf of Air Liquide Australia Solutions Pty Ltd and Manildra Energy Australia Pty Ltd to accompany an Environmental Impact Statement (EIS) for the construction of a CO₂ processing plant located at Lot 143 DP1069758, Lot 3 DP3885, Lot 1 DP605942, Lots 5 & 6 DP544730 and Lot A DP384559, Bolong Road, Bomaderry.

The development is considered to meet the aims and objectives of Planning for Bushfire Protection 2019 subject to the following recommended conditions of consent.

Asset Protection Zones

- From the commencement of building works and in perpetuity, the property around the development to a distance of 10 metres (or the property boundary, whichever comes first) shall be maintained as an inner protection area in accordance with Appendix 4.1.1 of Planning for Bush Fire Protection 2019:

When establishing and maintaining an inner protection area, the following requirements apply:

- tree canopy cover should be less than 15% at maturity;
- trees at maturity should not touch or overhang the building;
- lower limbs should be removed up to a height of 2 m above the ground;
- tree canopies should be separated by 2 to 5 m;
- preference should be given to smooth-barked and evergreen trees;
- large discontinuities or gaps in the shrubs layer should be provided to slow down or break the progress of fire towards buildings;
- shrubs should not be located under trees;
- shrubs should not form more than 10% ground cover;
- clumps of shrubs should be separated from exposed windows and doors by a distance of at least twice the height of the vegetation;
- grass should be kept mown (as a guide, grass should be kept to no more than 100mm in height); and
- leaves and vegetation debris should be removed regularly.

Services

- The provision of water, electricity and gas must comply with the following in accordance with Table 7.4a of Planning for Bush Fire Protection 2019:
 - reticulated water is to be provided to the development,
 - all above-ground water service pipes external to the building are metal, including and up to any taps,
 - where practicable, electrical transmission lines are underground,
 - where overhead, electrical transmission lines are proposed as follows:
 - lines are installed with short pole spacing (30m), unless crossing gullies, gorges or riparian areas, and
 - no part of a tree is closer to a power line than the distance set out in accordance with the specifications in ISSC3 Guideline for Managing Vegetation Near Power Lines.
 - reticulated or bottled gas is installed and maintained in accordance with AS/NZS 1596:2014 and the requirements of relevant authorities, and metal piping is used,
 - all fixed gas cylinders are kept clear of all flammable materials to a distance of 10m and shielded on the hazard side,
 - connections to and from gas cylinders are metal,
 - polymer-sheathed flexible gas supply lines are not used, and
 - above-ground gas service pipes are metal, including and up to any outlets.

Access

- If not already constructed to a higher standard, access shall comply with the following provisions for Property access roads, in accordance with of Table 7.4a of *Planning for Bush Fire Protection 2019*:
 - property access roads are two-wheel drive, all-weather roads;
 - the capacity of road surfaces and any bridges/causeways is sufficient to carry fully loaded firefighting vehicles (up to 23 tonnes); bridges and causeways clearly, indicate load rating.
 - there is suitable access for a Category 1 fire appliance to within 4m of the static water supply where no reticulated supply is available;
 - minimum 4m carriageway width;
 - a minimum vertical clearance of 4m to any overhanging obstructions, including tree branches;
 - property access must provide a suitable turning area in accordance with Appendix 3;
 - curves have a minimum inner radius of 6m and are minimal in number to allow for rapid access and egress;
 - the minimum distance between inner and outer curves is 6m;
 - the cross fall is not more than 10 degrees;
 - maximum grades for sealed roads do not exceed 15 degrees and not more than 10 degrees for unsealed roads.

It is therefore concluded the development meets the specifications and requirements of Planning for Bushfire Protection 2019 subject to the recommendations of this Bushfire Assessment Report.



Peter Dowse

Owner and Principal Bushfire Planner

BPAD Accredited Practitioner - 46547 (Level 3)

SOUTH COAST BUSHFIRE

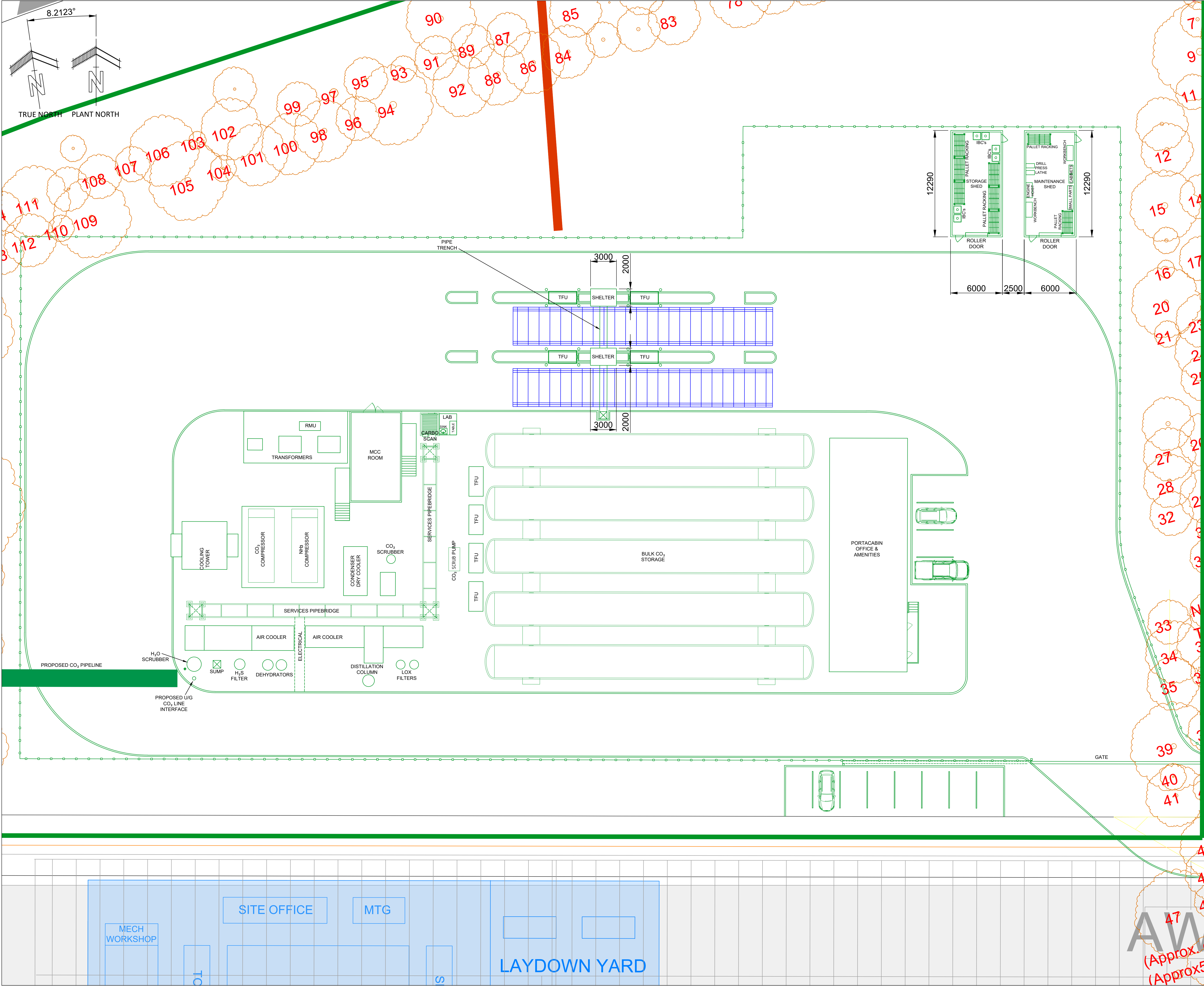
p. 0411576005

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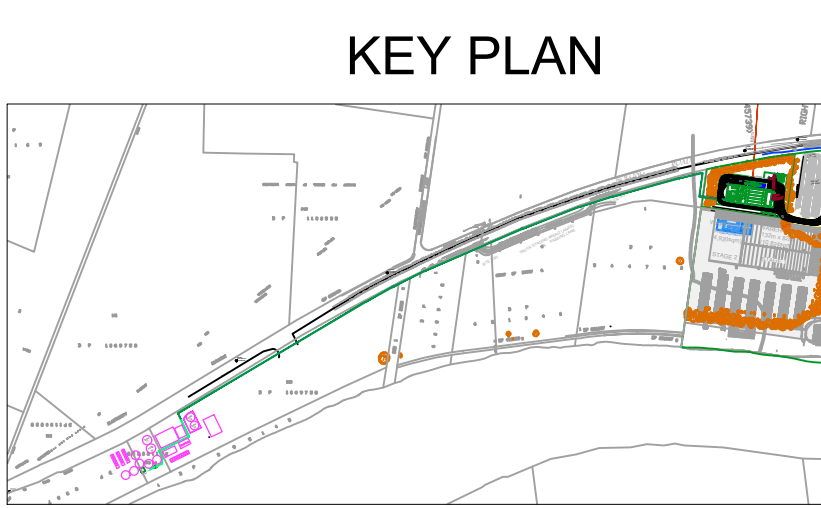


Annexure 1

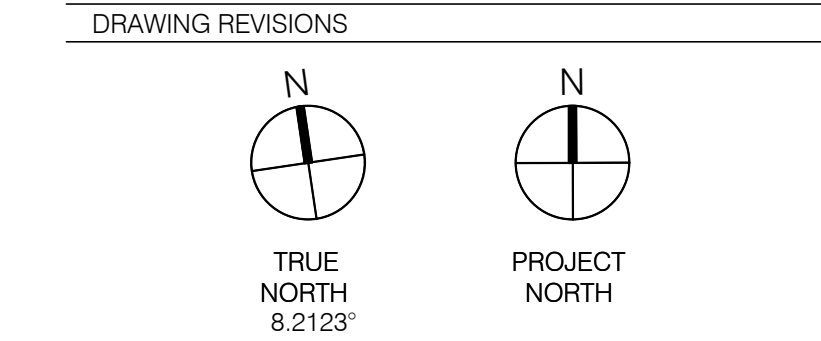
Site Plan



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C	FOR INFORMATION	2025/11/26	BMK	DM	TB
B	FOR INFORMATION	2025/11/20	BMK	DM	TB
A	FOR INFORMATION	2025/11/06	BMK	DM	TB



PROJECT TITLE :
LIQUIFIED CO2 PLANT

AIR LIQUIDE
NOWRA, NSW

Babbage

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DRAWING TITLE:
CO2 PLANT
PLANT LAYOUT SITE SKETCH

FOR INFORMATION ONLY 2026.01.14		
DATE	INITIAL	
DESIGNED	04/12/2024	DM
DRAWN	07/18/2025	BMK
CHECKED	DD/MM/YYYY	INITIALS
APPROVED	DD/MM/YYYY	INITIALS

SCALE:
1:200 @ A1
1:400 @ A3

JOB NO:
67536

DWG NO:
67536-PM-SKT-007

REV:
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Annexure 2

HAZARD ASSESSMENT PLANS



Hazard Assessment Plan

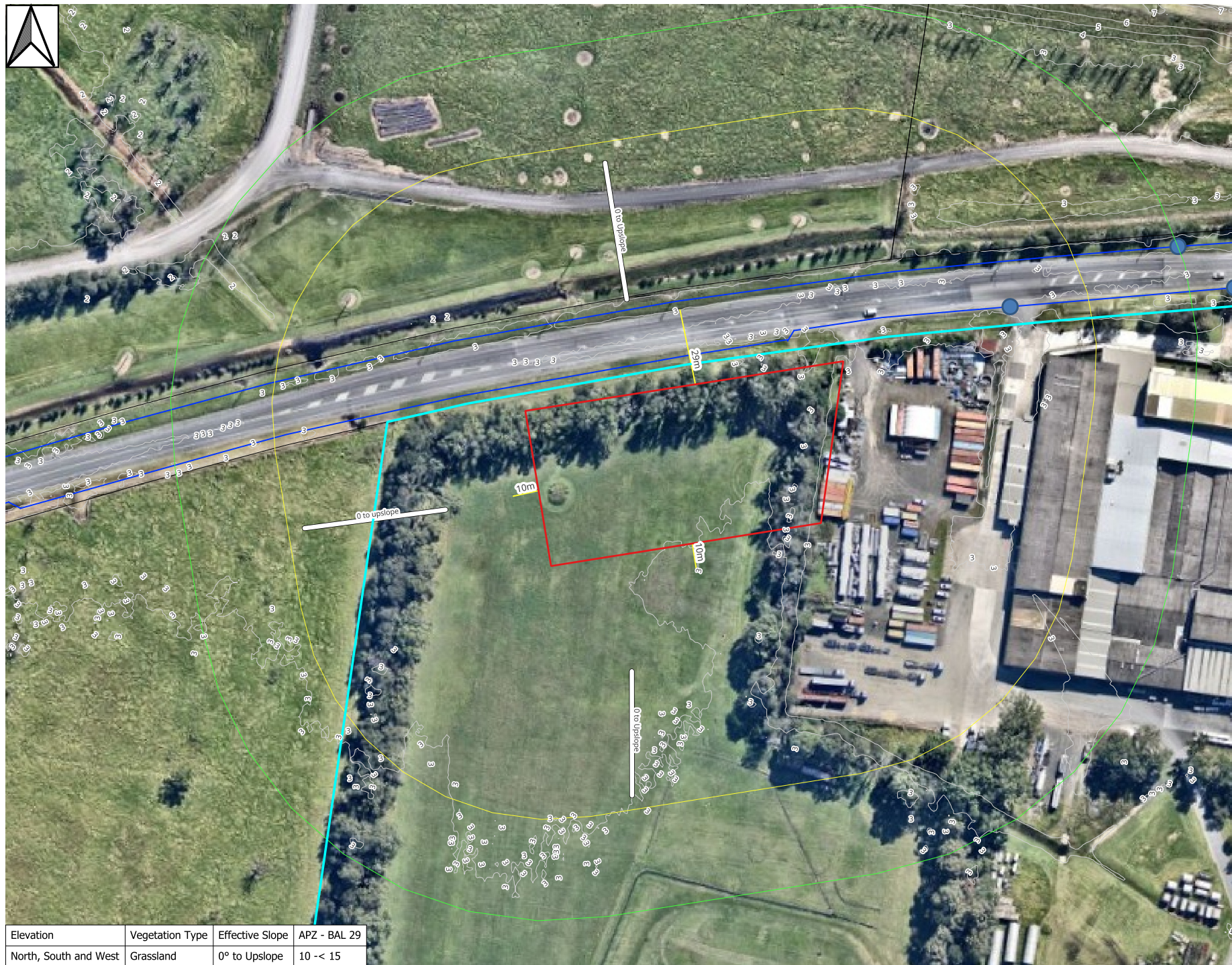
Lot A DP 384559

Bolong Rd, Bolong

Map Key

- Effective Slope
- 140m Buffer
- 100m Buffer
- Development Site
- Distance
- Cadastre
- Property for Assessment

0 27 54 m



Elevation	Vegetation Type	Effective Slope	APZ - BAL 29
North, South and West	Grassland	0° to Upslope	10 -< 15