

Office of the Coordinator General
Department of the Premier and Cabinet | Dumas House

COMMENT ON DRAFT COORDINATOR GENERAL GUIDELINES (STATE DEVELOPMENT ACT 2025)

The Urban Bushland Council WA Inc. (UBC) welcomes the opportunity to comment on the draft Coordinator General Guidelines but would like our concerns about the short turnaround time noted.

Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. We are a voluntary community association with an active membership of more than 90 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100+ individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA. More details at <https://www.bushlandperth.org.au/> . We recently celebrated 30 years of advocacy for the protection of urban bushland.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature.

UBC advocates for:

- Protection, conservation and active management of urban bushlands, wetlands and their ecological linkages
- Ending the clearing of native vegetation in urban areas
- Increasing tree canopy cover in urban areas to a minimum of 30 %
- More investment in our areas of native vegetation in urban areas
- Better detection, control, reduction and management of threatening processes in these areas
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

UBC Submission

As outlined in the letter to the Premier on 19 November 2025 (attached), Environmental NGOs including the Urban Bushland Council, strongly support a rapid transition to renewable energy and decarbonisation of the Western Australian economy. However, this transition must not come at the expense of biodiversity and remnant ecosystems. Apart from concerns about the need for a sustainable ecosystem, destruction of biodiversity is likely to undo the benefits of decarbonisation.

Australia is already experiencing severe biodiversity decline and habitat loss, and further destruction of intact ecosystems risks accelerating extinctions and ecosystem collapse.

The transition to renewable energy must therefore be implemented in a way that:

- avoids biodiversity loss
- protects urban bushland and ecological corridors
- prioritises previously cleared land
- ensures strong environmental safeguards remain intact

Evidence and real-world case studies demonstrate that an energy transition that is good for biodiversity is both possible and essential. Further biodiversity loss will act to reduce the positive impact of the energy transition by causing other damaging impacts such as direct local increase heat and reduced rainfall. Western Australia may become fully energy renewable and unliveable due to local decisions reducing

biodiversity. These current draft guidelines, need strengthening, particularly in the areas relating to active nature-positive planning, transparency and public participation.

Specific Concerns with the Draft Guidelines

Guidelines are not legally binding: The draft guidelines explicitly state they are not regulatory instruments and only provide guidance on how the Act may be applied. The lack of clear legal boundaries encourages the use of exceptions rather proposals seeking to comply through project design phases. In the long run this can create delays in project implementation.

This means:

- the Minister and Coordinator General are not required to follow them
- the guidelines provide no enforceable safeguards
- they do not constrain the broad powers provided by the Act

This creates a risk that projects could receive “priority” designation with minimal transparency or environmental scrutiny.

Recommendation:

Key safeguards should be embedded in legislation or regulations, not discretionary guidelines. Guidelines should be limited to how to interpret the legislative and regulatory frameworks appropriately. We believe, if implemented clearly regulation will reduce the time from conception to construction, not increase it.

Priority Project criteria are extremely broad: The draft guidelines indicate that projects can be designated Priority Projects if they are strategically or economically significant. The criteria include economic investment, job creation, infrastructure development, supporting energy transition or diversification of the economy.

These criteria are so broad that almost any major development could qualify, including projects with substantial environmental impacts. Information provided by the EDO notes that the guidelines do not clearly limit what projects could receive designation.

Recommendations:

- explicitly exclude projects that would: destroy threatened ecological communities, clear remnant urban bushland, fragment key biodiversity corridors or impact threatened species habitat.
- require appropriate disclosure of the criteria used to determine a project is strategically or economically significant.

Environmental considerations are vague: The Act requires consideration of social and environmental impacts, but the draft guidelines provide little detail about how this will occur in practice. Without clear criteria environmental protection risks becoming secondary to economic objectives and biodiversity impacts may not meaningfully influence project designation

Recommendation: The guidelines should explicitly require:

- application of the mitigation hierarchy (avoid → minimise → offset)
- a biodiversity-first site selection approach
- demonstration that lower-impact sites were assessed and rejected
- no designation for projects causing irreversible biodiversity loss.

Lack of transparency and public participation: The guidelines do not require:

- public consultation before designating Priority Projects
- publication of environmental assessments
- independent oversight of decisions

This absence of transparency was raised by the environment sector in relation to the Act itself. Transparency in government decision making is a fundamental tenant of a modern democracy and is critical to ensuring

the appropriate oversight and accountability. The lack of accountability will ultimately create uncertainty and fuel alternative opinions about the success of the energy transition.

Recommendation: The guidelines should require:

- public consultation prior to designation
- publication of assessment criteria and evidence
- opportunity for community submissions.
- Create disclosure of the basic of decisions made

Risk of bypassing environmental safeguards: The Act allows the Minister to issue notices that can influence how other legislation applies to projects. These powers include timeframe notices, joint decision notices and modification orders. Used inappropriately, these powers could compress environmental assessment timeframes, weaken environmental decision-making or override existing environmental protections.

Recommendation: The guidelines should state clearly that:

- project should always seek to improve local biodiversity and generate carbon free energy
- environmental legislation must not be weakened or overridden
- environmental assessment must remain independent and science-based.

OTHER MATTERS

Renewable energy and biodiversity: UBC strongly supports the rapid rollout of renewable energy infrastructure. However, we note:

- Australia already has one of the highest biodiversity loss rates in the developed world.
- habitat destruction remains the primary driver of species decline.

Renewable energy development must therefore follow a nature-positive pathway, including **Avoidance first**. Projects should prioritise cleared land, degraded land, industrial areas or existing infrastructure corridors.

Strategic spatial planning: Governments should undertake biodiversity-informed spatial mapping and identification of renewable energy zones that avoid high biodiversity areas. UBC refers you to the recent work of Professor Brendan Wintle from the University of Melbourne that was presented to the CCWA 2025 Annual Conference.

Protect urban bushland: Urban bushland is already severely fragmented and under pressure. It should not be sacrificed for energy infrastructure, particularly where alternative sites exist. Within the urban environment, alternative sites are common and often ignored. Refer again to Professor Wintle's research.

Recommendations: The guidelines should include:

1. **Explicit biodiversity protection principles:** Projects should not be designated Priority Projects where they clear intact native vegetation, impact threatened species habitat or fragment ecological corridors.
2. **Renewable energy siting hierarchy:** Priority should be given to previously cleared land, degraded land, or industrial or disturbed areas. Native vegetation clearing should be a last resort.
3. **Mandatory biodiversity assessment:** Before designation, projects should demonstrate avoidance of high biodiversity value areas, minimal ecological footprint and alignment with state biodiversity conservation strategies.
4. **Transparency and accountability:** The guidelines should require public consultation on Priority Projects, publication of environmental assessments, independent review of decisions and disclosure of decisions and decision rationale.

Concluding statement

UBC recognises that the State Development Act aims to accelerate projects that support Western Australia's economic development and energy transition. We believe that without clear boundaries within the legislation and guidelines projects may take longer to become operational. We believe that stronger guiderails will help developments focus and balance project outcomes and ensure longer-term goals for decarbonising energy generation are met.

Western Australia can achieve both a rapid renewable energy transition and ensure that this transition has only positive effects on the local climate and liveability of Western Australia. With appropriate planning and site selection, renewable energy infrastructure can be developed without sacrificing urban bushland or other high-value habitats.

Thank you again for the opportunity to comment.

Yours sincerely,

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Chairperson

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