11 November 2026

Submission

Metropolitan Region Scheme Amendment 1459 (Standard) - Lot 500 Lampiter Drive, Mardella

To: Western Australian Planning Commission
https://haveyoursay.dplh.wa.gov.au/mrsamend-lot500lampiterdr

1. UBC position

The Urban Bushland Council WA (UBC) objects to Metropolitan Region Scheme (MRS) Amendment 1459 in its currently advertised form.

The amendment proposes transferring approximately 55 hectares in and around Lot 500 Lampiter Drive, Mardella, from Regional Open Space (ROS) reservation to the Rural zone.

UBC's principal concern is the proposed removal of ROS protection from land within Bush Forever Area 360 (BF 360), which contains significant conservation values, including Threatened Ecological Communities (TECs), threatened black cockatoo habitat and a Conservation Category Wetland (CCW).

UBC advocates the full protection of Bush Forever sites and opposes any reduction in their existing statutory conservation protection.

The Environmental Protection Authority (EPA), in its advice dated 21 September 2026, explicitly recommends modifying the amendment to retain BF 360 within the ROS reservation. UBC strongly supports this recommendation.

UBC also considers that the amendment must be assessed against the WAPC's own *State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region* (SPP 2.8), and that accurate and comprehensive environmental mapping must be provided before the amendment is determined.

2. Inconsistency with State Planning Policy 2.8 and the EPA's advice

SPP 2.8 establishes the State Government's policy framework for the long-term protection and management of Bush Forever areas. Its objectives include establishing a comprehensive, adequate and representative regional conservation system and protecting significant bushland for conservation purposes. Section 5.1.1(i) identifies the protection and management of regionally significant bushland as a primary purpose and fundamental planning consideration. More specifically, section 5.1.2.1(vi) seeks the reservation of government-owned Bush Forever reserves within the MRS to provide additional planning security and protection. The policy uses the former MRS terminology of Parks and Recreation reservation.

These provisions are directly relevant to the proposed removal of existing ROS protection from BF 360.

The EPA has identified the following significant environmental values within the northern portion of the amendment area and adjoining land:

- Approximately 2.34 hectares of *Corymbia calophylla/Kingia australis woodland on heavy soils of the Swan Coastal Plain* TEC.
- Approximately 1 hectare of *Herb Rich Shrublands in Clay Pans* TEC.
- Approximately 3.1 hectares of potential habitat for three threatened black cockatoo species.
- Conservation Category Wetland 14817 and associated vegetation.

The EPA acknowledges that rezoning to Rural would permit broader land uses and development opportunities that could adversely affect these values. It explicitly recommends that BF 360, including the portion of Mundijong Road intersecting the Bush Forever area, remain within the ROS reservation. The

Amendment Report instead relies on retention of the Bush Forever designation, Environmentally Sensitive Area status and future planning mechanisms to justify removing ROS protection.

UBC rejects the proposition that retaining the Bush Forever designation is equivalent to retaining the existing ROS reservation.

Section 6 of SPP 2.8 places the onus on the proponent to demonstrate consistency with the policy or provide sufficient evidence justifying departure from it. The policy states that proposals departing from its measures will not be supported without overriding justification.

UBC considers that a change in land tenure from Crown land to Shire-owned freehold land does not, of itself, provide adequate justification for removing existing regional conservation protection.

UBC requests that the WAPC explicitly demonstrate how Amendment 1459 is consistent with the objectives and relevant provisions of SPP 2.8, particularly sections 5.1.1, 5.1.2.1 and 6.

UBC requests that Amending Plan 3.2898 be modified to retain the existing ROS reservation over all land within BF 360 affected by the amendment, consistent with the EPA's recommendation and the conservation objectives of SPP 2.8.

UBC does not support replacing existing regional protection with reliance on future local planning controls.

3. Accurate mapping of environmental values is essential

UBC is concerned that the amendment documentation does not adequately demonstrate the spatial relationship between the proposed rezoning and the significant environmental values identified by the EPA. The Amendment Report describes BF 360 as adjoining the northern boundary of Lot 500, while the EPA identifies the northern portion of the broader amendment area as being within BF 360. The Shire's 2023 Environmental Assessment Report also identifies BF 360 within its study area, including part of the Mundijong Road reserve.

SPP 2.8, section 5.1.1(vi), recognises that Bush Forever boundaries and regionally significant vegetation may require verification using additional information and on-ground investigations.

UBC requests that the WAPC provide accurate, comprehensive and publicly accessible mapping clearly identifying:

- The precise boundaries of Bush Forever Area 360 and its relationship to the proposed rezoning.
- The location and extent of the identified Threatened Ecological Communities.
- The boundary of Conservation Category Wetland 14817 and its recommended 50-metre buffer.
- Significant remnant vegetation and identified threatened fauna habitat.
- The relationship between these environmental values, existing ROS reservations and the proposed Rural zoning.

These environmental constraints must be clearly shown together at an appropriate scale, using current authoritative spatial information. Any uncertainty about environmental boundaries or values must be explicitly identified and resolved through appropriate investigation.

The responsibility for providing this information rests with the WAPC and the proponent, not community organisations or individual submitters.

The requirements of SPP 2.8 reinforce the proponent's responsibility to provide sufficient evidence to support the proposed planning decision.

UBC considers that the environmental implications of removing ROS protection cannot be adequately assessed without accurate mapping of the values potentially affected.

Mapping discrepancies or omissions must be resolved before the amendment is determined. If updated mapping reveals materially different environmental implications, further public consultation should be undertaken.

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4. Protection of threatened biodiversity, wetlands and ecological connectivity

The Shire's *Environmental Assessment Report*, prepared by Emerge Associates in June 2023, identifies vegetation in very good to excellent condition, significant ecological communities, wetland values and threatened fauna habitat. The report recommends detailed flora, vegetation and fauna surveys and emphasises the importance of avoiding impacts on significant environmental values.

Although substantial portions of Lot 500 have been cleared, remnant vegetation and scattered trees outside BF 360 may provide black cockatoo habitat and contribute to ecological connectivity.

SPP 2.8 applies to direct and significant indirect impacts on regionally significant bushland within Bush Forever areas, including impacts arising from adjoining development.

UBC considers that avoidance of environmental impacts must be the first priority. Protection should not depend upon offsets or mitigation measures where impacts can reasonably be avoided.

The EPA also identified CCW 14817 adjoining the northern part of the amendment area and recommends a 50-metre buffer. Potential changes to surface water drainage, groundwater levels and water quality associated with future land uses could adversely affect the wetland, associated vegetation and BF 360.

UBC requests that significant vegetation, threatened fauna habitat, ecological linkages and wetland values be identified and protected, including where they occur outside BF 360.

The recommended wetland buffer and appropriate hydrological safeguards must be secured, and cumulative impacts from future development and infrastructure must be considered.

5. Lack of demonstrated need to rezone Bush Forever Area 360

The Amendment Report identifies the change in land tenure and potential future equine and rural uses as justification for removing the ROS reservation. However, the Shire's earlier Council reports establish that financial returns, potential rural-residential subdivision and increased development flexibility have also been important objectives.

The February 2024 Council report considered the potential for subdivision and sale of land, including the increased value that could result from rezoning. Subsequent Council discussions considered equine facilities and other opportunities for the site. The South Metropolitan Peel Sub-Regional Planning Framework identifies the subject land as Open Space. The Shire's Council minutes also demonstrate that the proposed rezoning was deferred twice during 2024 while future uses of the land were being considered.

The proposed Master Plan has not yet established the future land uses or their environmental and infrastructure implications.

UBC considers that the amendment documentation has not demonstrated why the Shire's objectives require the removal of existing regional conservation protection from BF 360. The Shire's desire to achieve greater flexibility or financial benefit from its landholding does not, in itself, establish a need to rezone environmentally significant Bush Forever land.

A substantial proportion of the amendment area comprises previously cleared or highly degraded land. This raises the question of whether the Shire's proposed uses could be accommodated on environmentally less constrained portions of the site while retaining the existing ROS reservation over BF 360.

UBC therefore requests that the WAPC explicitly address the following question:

> Why is it necessary to remove Regional Open Space protection from Bush Forever Area 360 to achieve the Shire's stated objectives, particularly when no specific development proposal requiring that land has been established?

UBC considers that this question is fundamental to determining whether the proposed amendment is justified.

The WAPC should require the proponent to demonstrate why BF 360 cannot be excluded from the rezoning and whether reasonable alternatives have been examined that would achieve the Shire's objectives without weakening existing regional conservation protection.

In the absence of such justification, removal of the ROS reservation over BF 360 would be inconsistent with the conservation objectives of SPP 2.8 and the EPA's specific recommendation.

The EPA's decision not to formally assess Amendment 1459 under Part IV of the *Environmental Protection Act 1986* should not be interpreted as endorsement of removing existing ROS protection.

UBC believes that protection of BF 360 must be secured at the MRS amendment stage, rather than deferred to subsequent local planning scheme amendments, subdivision or development approvals.

6. Conclusion and recommendations

UBC considers that Amendment 1459, as advertised, does not adequately justify removing regional conservation protection from BF 360 or demonstrate that its significant environmental values will be protected. The WAPC's own SPP 2.8 establishes clear expectations for protecting regionally significant bushland and requires departures from its policy measures to be supported by sufficient evidence and overriding justification.

The EPA has recommended a straightforward modification that would retain the existing regional protection of BF 360.

UBC requests that the WAPC:

1. **Retain Bush Forever Area 360 within the Regional Open Space reservation**, including the relevant portion of Mundijong Road, consistent with the EPA's explicit recommendation.
2. **Require the proponent to demonstrate why rezoning BF 360 is necessary** to achieve the Shire's stated objectives, including examination of alternatives that retain its existing regional conservation protection.
3. **Demonstrate how Amendment 1459 complies with SPP 2.8**, particularly sections 5.1.1, 5.1.2.1 and 6, and provide clear justification for any proposed departure from the policy.
4. **Provide accurate, comprehensive and publicly accessible mapping** identifying BF 360, the TECs, CCW 14817 and its buffer, significant vegetation and the proposed zoning boundaries.
5. Ensure that threatened biodiversity, wetlands, ecological linkages and significant vegetation outside BF 360 are adequately identified and protected.

UBC requests that Amendment 1459 not be approved as currently advertised and that the existing ROS reservation over BF 360 be retained in full.

The WAPC should give effect to its own Bushland Policy and the EPA's advice by maintaining the long-term statutory protection of this regionally significant Bush Forever area.

Thank you for the opportunity to comment.

Yours sincerely.

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References

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2. Western Australian Planning Commission (2026). *MRS Amendment 1459 (Standard) – Amendment Report*, October 2026.
3. Environmental Protection Authority (2026). *Advice under section 48A(1)(a), Environmental Protection Act 1986 – MRS Amendment 1459*, 21 September 2026.
4. Western Australian Planning Commission (2026). *MRS Amendment 1459 – Amending Plan 3.2898*.
5. Emerge Associates (2023). *Environmental Assessment Report – 10 (Lot 500) Lampiter Drive, Mardella*, prepared for the Shire of Serpentine Jarrahdale.
6. Shire of Serpentine Jarrahdale (2024). *Ordinary Council Meeting Minutes and associated reports*, 19 February, 20 May and 16 September 2024.

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