Placid Waters South Residential Development

Application Number: **03479** Commencement Date: **02/06/2026** Status: **Locked**

1. About the project

1.1 Project details

1.1.1 Project title *

Placid Waters South Residential Development

1.1.2 Project industry type *

Residential Development

1.1.3 Project industry sub-type

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1.1.4 Estimated start date *

01/01/2027

1.1.4 Estimated end date *

30/12/2027

1.2 Proposed Action details

1.2.1 Provide an overview of the proposed action, including all proposed activities. *

BMP Land Projects Pty Ltd (the Proponent) proposes to develop Lot 9003 Peel Parade, Coodanup, Western Australia, for residential purposes (herein referred to as the Proposed Action). The Proposed Action will facilitate the development of urban land and protection of conservation values in Regional Open Space (ROS) consistent with the Peel Region Scheme (PRS) and the City of Mandurah Local Planning Scheme No. 12 (LPS 12). The Proposed Action involves residential lots, roads, drainage infrastructure, regional open space, local open space, landscaping and associated services.

The Project Area comprises approximately 21.24 ha and is located approximately 74 km south of the Perth Central Business District (CBD) and 3.2 km south-east of the Mandurah City Centre, within the City of Mandurah (see **Attachment A**, **Figure 1**). It is bounded by Peel Parade to the south, existing residential development to the east and west, and the Serpentine River to the north. Land adjoining the Project Area to the north and south is reserved as ROS under the PRS, associated with the Serpentine River and Peel-Harvey Estuary respectively, with a portion of the northern Project Area also reserved as ROS.

The Proposed Action comprises a 16.97 ha disturbance footprint and a 4.26 ha avoidance area where native vegetation and environmental values will be retained (see **Attachment A**, **Figure 2**). The Avoidance area forms part of a 5.36 ha foreshore reserve adjoining the Serpentine River and is complemented by additional retained vegetation within Local Open Space (LOS) incorporated into the subdivision design (see **Attachment A**, **Figure 3**). These avoidance areas are consistent with the strategic planning framework established under the PRS and LPS 12, which directs urban development to suitable land while retaining environmentally significant areas within the ROS network. The subdivision design further minimises impacts by retaining additional vegetation within the urban zoned land where practicable.

The activities that will be undertaken as part of the Proposed Action include:

- Pre-construction activities including site establishment, delineation of the disturbance footprint, and vegetation clearing.
- Bulk earthworks, including cutting and filling of the land to achieve suitable finished ground levels, maintain adequate separation from groundwater, and tie ground levels into the surrounding land.
- Civil construction works, including the construction of internal roads, landscaping, drainage infrastructure, utilities, and local open space.
- Ongoing maintenance works of landscaped areas and drainage infrastructure following construction.

In accordance with the Landscape Concept Plan, native trees and vegetation, including species that provide black cockatoo habitat, will be retained where possible and supplemented with additional planting throughout the Project Area. While detailed landscape design will occur during subsequent design stages, this planting forms part of the overall mitigation strategy for the Proposed Action.

The principal environmental impacts associated with the Proposed Action are limited to the clearing of native vegetation within the disturbance footprint. This will result in minor impacts to Matters of National Environmental Significance (MNES), including small areas of black cockatoo foraging habitat, potential nesting trees that do not currently contain suitable breeding hollows, marginal habitat for threatened and migratory bird species, migratory shorebirds, and 0.31 ha of the Subtropical and Temperate Coastal Saltmarsh Threatened Ecological Community. A detailed assessment of these impacts is provided in Section 4 and the supporting ecological assessments (**Attachment B**, **Attachment C** and **Attachment D**).

The Proposed Action relates solely to the development of Lot 9003, one of the last remaining undeveloped urban landholdings identified for residential development under the PRS and LPS 12. It is not part of a larger action or staged development for the purposes of this referral.

1.2.2 Is the project action part of a staged development or related to other actions or proposals in the region?

No

1.2.6 What Commonwealth or state legislation, planning frameworks or policy documents are relevant to the proposed action, and how are they relevant? *

Commonwealth

Based on historic and recent ecological assessments within the Project Area, one (1) nationally significant ecological community occurs within the Project Area and one (1) wetland of international importance occurs adjacent to the Project Area. In addition, a number of Environmental Protection and Biodiversity Act 1999 (EPBC Act) listed threatened and migratory species were either recorded during field surveys or assessed as having a 'likely' or 'possible' likelihood of occurrence based on habitat suitability. Accordingly, the following Commonwealth policies, guidelines and supporting documents have been considered in the assessment of potential impacts associated with the Proposed Action:

- Significant Impact Guidelines 1.1 Environmental Protection and Biodiversity Conservation Act 1999 (hereafter referred to as 'the significant impact guidelines') (Department of the Environment 2013)
- Conservation Advice for Subtropical and Temperate Coastal Saltmarsh (hereafter referred to as 'the Saltmarsh TEC advice') (Threatened Species Scientific Committee 2013)
- Ecological Character Description for the Peel-Yalgorup Ramsar Site (hereafter referred to as the 'Peel-Yalgorup ECD') (Hale and Butcher 2007).
- Local Planning Scheme 12 – Special Control Area (hereafter referred to as 'SCA1') (CoM 2022)
- State Planning Policy 2.9: Water Resources (SPP 2.9) (WAPC 2025)
- Carnaby's Cockatoo (Calyptorhynchus latirostris) Recovery Plan (DPaW 2013)
- Approved Conservation Advice for Calyptorhynchus banksia naso (Forest Red-tailed Black Cockatoo) (DEWHA 2009)
- Approved Conservation Advice for Calyptorhynchus baudinii (Baudin's Black Cockatoo) (TSSC 2018)
- Referral Guideline for 3 WA Threatened Black Cockatoo Species (DAWE 2022)
- EPBC Act Policy Statement 3.21 – Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species (DCCEEW 2017).

The Peel-Yalgorup Ecological Character Description (ECD) provides a description of the ecological character of the Peel-Yalgorup Ramsar Wetland, and has been considered as part of completing this referral and considering the potential impacts associated with the Proposed Action.

The *referral guidelines for 3 WA Threatened Black Cockatoo species* (hereafter referred to as 'the referral guidelines') (2022) provides impact referral thresholds and a foraging habitat scoring tool and has been considered as part of completing this referral and considering the potential significance of the proposed impacts to BC.

The EPBC Act Policy Statement 3.21 – Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species (hereafter referred to as 'the shorebird guidelines') (DCCEEW 2017) provides guidance for assessing actions concerning migratory shorebird species listed under the EPBC Act and has been considered in this referral.

Referral of the Proposed Action pursuant to the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) has been made to provide statutory certainty and mitigate the risk of third party referrals during construction. The findings of the ecology surveys and impact assessment indicate that the Proposed Action will not or is unlikely to have a significant impact on MNES and that residual impacts and risks can be effectively mitigated and managed through environmental management plans imposed as conditions under the Western Australian planning and environmental approval process (e.g. Construction Environmental Management Plan). On this basis the proponent submits that the Proposed Action is not a controlled action requiring assessment and approval.

Western Australia

Peel Region Scheme (PRS)

The Project Area is a mix of land zoned for ‘Urban’ and reserved as ‘ROS’ under the PRS. Two large areas approximately 187 m north and 470 m north-east of the Project Area (adjoining the Serpentine River) are zoned ‘Urban’ and ‘Rural’ respectively.

Consistent with the strategic land use intent of the PRS the Proposed Action includes urban development in the urban zone and conservation in the ROS. The ROS reserve provides for the long-term protection of environmental values, low lying riparian vegetation and establishes a buffer between urban development and the adjacent Serpentine River.

City of Mandurah Local Planning Scheme (LPS) No. 12 (LPS 12)

The Project Area is a mix of land zoned for ‘Urban’ (Special Control Area 1) and reserved for ROS. The Project Area is surrounded by already developed residential area (zoned for ‘Residential’ purposes) to the east and west, and further north and north-east (approximately 187 m and 470 m north and north-east respectively). The Proposed Action is therefore consistent with the intended land use under the local planning framework and represents the development of one of the remaining undeveloped urban zoned landholdings within the Mandurah East strategy area.

City of Mandurah Local Planning Strategy (2022)

The Project Area is located within the 17,350 ha ‘Mandurah East’ strategy area, a region characterised by historically dispersed development across sub-precincts ranging from Madora Bay to Herron. The Project Area is also situated within the Strategic Metropolitan Centre ‘Mandurah’ under State Planning Policy 4.2 (Activity Centres), providing essential retail, community, residential, and employment activities.

The strategic planning documents identify the Project Area as suitable for future urban development, consistent with the objectives of the Proposed Action.

Planning and Development Act 2005 (PD Act) – Subdivision Application

The Western Australian Department of Planning, Lands and Heritage (DPLH) has agreed development does not warrant preparation of a Structure Plan. Consequently, development will proceed via a subdivision application.

Environmental Protection Act 1986 (WA) (EP Act)

Because the rezoning and reservation of the Proposal Area from “Rural” to “Urban” and “Regional Open Space” has already been referred to the WA Environmental Protection Authority (EPA) on two occasions — through the Peel Region Scheme and Local Planning Scheme No. 12 — and the EPA determined not to assess either scheme, no further referral under section 38 of the Environmental Protection Act 1986 is required. The proposed development is consistent with the approved planning framework and there is no new scientific or environmental information that would warrant separate referral and assessment as a proposal under Part IV of the EP Act.

Where native vegetation is required to be cleared within the Project Area, this will likely be undertaken in accordance with a subdivision approval and associated authorised subdivision works, which will provide an exemption from the requirement for a native vegetation clearing permit. Should bulk earthworks or any other works be commenced within the Project Area that requires clearing of native vegetation before subdivision approvals are granted, a clearing permit pursuant to Part V of the EP Act will be required.

Biodiversity Conservation Act 2016 (WA)

The Biodiversity Conservation Act 2016 (BC Act) provides for the listing of flora, fauna and threatened ecological communities and Ministerial authorisation (Section 40) to ‘take’, ‘disturb’ or modify listed flora, fauna and communities respectively. For activities expected to impact threatened fauna or flora, the Proponent would be required to obtain an authorisation to take or disturb. This includes a requirement to

outline how the mitigation hierarchy (avoidance, mitigation) has been applied, and monitoring to support implementation. The authorisation details conditions in terms of how activities that cause harm will be managed and is approved by the Minister.

It is not expected that any authorisation pursuant to the BC Act will be required.

1.2.7 Describe any public consultation that has been, is being or will be undertaken regarding the project area, including with Indigenous stakeholders. Attach any completed consultation documentations, if relevant. *

Public consultation associated with development of the Project Area has been undertaken as part of the broader strategic and statutory planning processes – led by the Western Australian Planning Commission (WAPC), DPLH and City of Mandurah. These have occurred over the last 25 years and have been associated with advertising and public consultation associated with development of the Peel Region Scheme, City of Mandurah LPS No.12 and Local Planning Strategy. Subsequent planning and development in the area has progressed in an orderly manner and to some extent the Proposal Area represents the last major development site in the local area. On this basis there is a high public expectation and acceptance for the land to be developed, and it is neither of high public interest or controversial.

1.3.1 Identity: Referring party

Privacy Notice:

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

By completing and submitting this form, you consent to the collection of all personal information contained in this form. If you are providing the personal information of other individuals in this form, please ensure you have their consent before doing so.

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1.3.1.1 Is Referring party an organisation or business? *

Yes

Referring party organisation details

ABN/ACN	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008 WA

Referring party details

Name	Jason Hick
Job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

1.3.2 Identity: Person proposing to take the action

1.3.2.1 Are the Person proposing to take the action details the same as the Referring party details? *

No

1.3.2.2 Is Person proposing to take the action an organisation or business? *

Yes

Person proposing to take the action organisation details

ABN/ACN	19691013297
Organisation name	BMP LAND PROJECTS PTY LTD
Organisation address	Level 2, 428 Little Bourke Street, Melbourne VIC

Person proposing to take the action details

Name	Mitch Brown
Job title	General Manager WA
Phone	0435 831 285
Email	mitch@wolfdene.com.au
Address	LEVEL 5, 28 THE ESPLANADE, PERTH, WA 6000

1.3.2.14 Are you proposing the action as part of a Joint Venture? *

No

1.3.2.15 Are you proposing the action as part of a Trust? *

No

1.3.2.17 Describe the Person proposing the action's history of responsible environmental management including details of any proceedings under a Commonwealth, State or Territory law for the protection of the environment or the conservation and sustainable use of natural resources against the Person proposing to take the action. *

There are no current proceedings against the Proponent under Commonwealth, State or Territory environmental law.

1.3.2.18 If the person proposing to take the action is a corporation, provide details of the corporation's environmental policy and planning framework

The Proponent does not have a formal environmental policy and planning framework, however, has a track record and commitment for ensuring projects are compliant with applicable environmental and planning policy, standards and law. The Proponent engages qualified environmental consultants and contractors to undertaken technical investigations, progress approvals, provide advice and where necessary monitor environmental compliance and performance during project delivery.

1.3.3 Identity: Proposed designated proponent

1.3.3.1 Are the Proposed designated proponent details the same as the Person proposing to take the action? *

Yes

Proposed designated proponent organisation details

ABN/ACN	19691013297
Organisation name	BMP LAND PROJECTS PTY LTD
Organisation address	Level 2, 428 Little Bourke Street, Melbourne VIC

Proposed designated proponent details

Name	Mitch Brown
Job title	General Manager WA
Phone	0435 831 285
Email	mitch@wolfdene.com.au
Address	LEVEL 5, 28 THE ESPLANADE, PERTH, WA 6000

1.3.4 Identity: Summary of allocation

Confirmed Referring party's identity

The Referring party is the person preparing the information in this referral.

ABN/ACN	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008 WA
Representative's name	Jason Hick
Representative's job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

Confirmed Person proposing to take the action's identity

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	19691013297
Organisation name	BMP LAND PROJECTS PTY LTD
Organisation address	Level 2, 428 Little Bourke Street, Melbourne VIC
Representative's name	Mitch Brown
Representative's job title	General Manager WA
Phone	0435 831 285
Email	mitch@wolfdene.com.au
Address	LEVEL 5, 28 THE ESPLANADE, PERTH, WA 6000

Confirmed Proposed designated proponent's identity

The Person proposing to take the action is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

1.4 Payment details: Payment exemption and fee waiver

1.4.1 Do you qualify for an exemption from fees under EPBC Regulation 5.23 (1) (a)? *

No

1.4.3 Have you applied for or been granted a waiver for full or partial fees under Regulation 5.21A? *

No

1.4.5 Are you going to apply for a waiver of full or partial fees under EPBC Regulation 5.21A?

No

1.4.7 Has the department issued you with a credit note? *

No

1.4.9 Would you like to add a purchase order number to your invoice? *

No

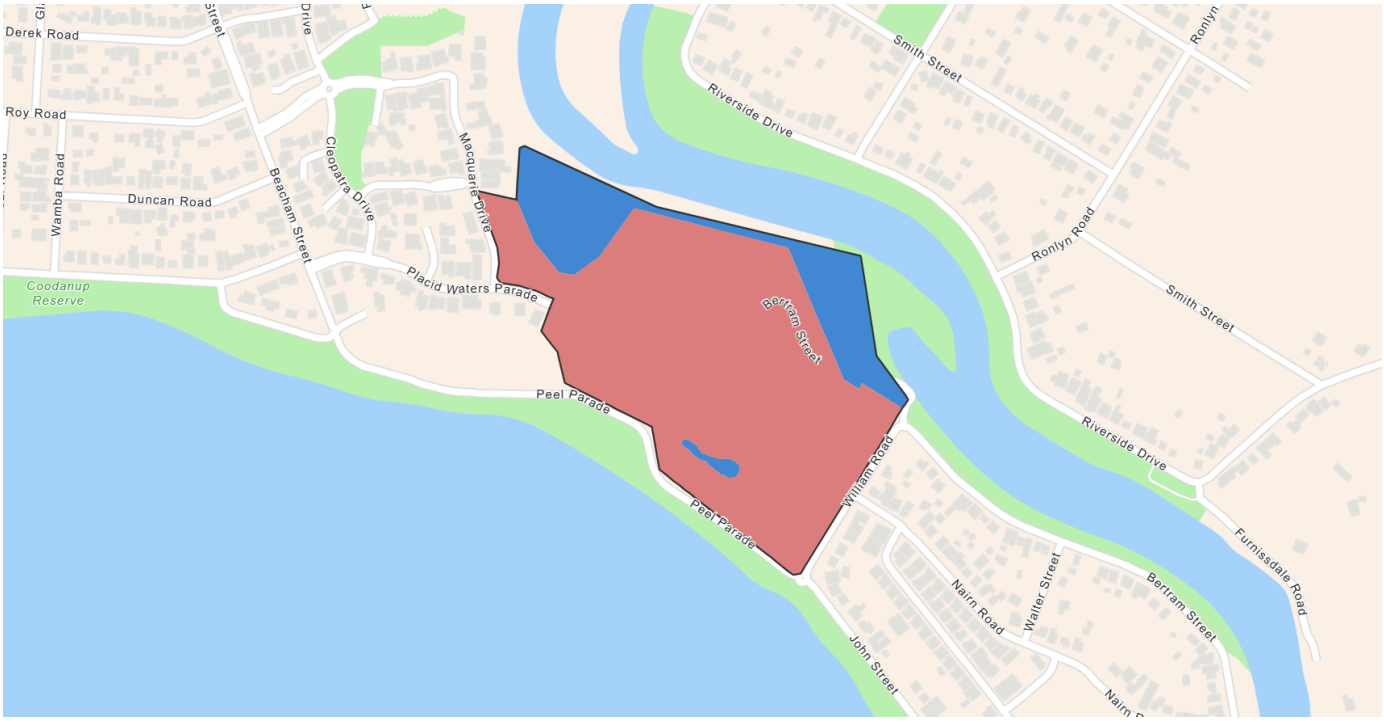
1.4 Payment details: Payment allocation

1.4.11 Who would you like to allocate as the entity responsible for payment? *

Person proposing to take the action

2. Location

2.1 Project footprint



Project Area: 21.25 Ha **Disturbance Footprint:** 16.98 Ha **Avoidance Area:** 4.26 Ha

2.2 Footprint details

2.2.1 What is the address of the proposed action? *

Lot 9003 Placid Parade, Coodanup 6210

2.2.2 Where is the primary jurisdiction of the proposed action? *

Western Australia

2.2.3 Is there a secondary jurisdiction for this proposed action? *

No

2.2.5 What is the tenure of the action area relevant to the project area? *

The Project Area is held as private freehold land on 28 Placid Waters Parade, Coodanup, 6210 (Lot 9003 on Plan no. P028395).
Lot 9003 is currently owned by Peel Rise Pty Ltd and is subject to delayed settlement contract with BMP Land Projects Pty Ltd (the Proponent), with settlement conditional upon obtaining the necessary planning and environmental approvals.

3. Existing environment

3.1 Physical description

3.1.1 Describe the current condition of the project area's environment.

The Project Area is located within the CoM approximately 74 km south of the Perth CBD and is approximately 3.2 km south-east of the Mandurah City Centre. The majority of the Project Area is zoned 'Urban' under the LPS 12, with the northern portion reserved ROS.

The Project Area is bounded by Peel Parade to the south, existing residential development to the east and west, and Serpentine River to the north. Land adjoining the Project Area to the north and south is reserved for ROS under the PRS, associated with the Serpentine River and Peel Harvey Estuary, respectively.

The Project Area is situated within the Strategic Metropolitan Centre 'Mandurah' under State Planning Policy 4.2 (Activity Centres), providing essential retail, community, residential, and employment activities. The City of Mandurah Local Planning Strategy positions the Project Area within the 17,350 ha 'Mandurah East' strategy area, a region characterised by historically dispersed development across sub-precincts ranging from Madora Bay to Herron (CoM 2022).

Current access to the Project Area is possible via Placid Waters Parade which dissects the Project Area in the west, and Peel Parade which runs along the southern boundary of the Project Area. Future access to the Project Area will be maintained through these existing road networks and additionally provided through construction of a private road network throughout the Project Area as identified in the landscape plan. No road upgrades beyond the Project Area will be undertaken.

A review of the historical aerial imagery available from 1960 (Landgate 2026) identifies the following environmental features within the Project Area (refer **Attachment E**):

- The earliest available aerial imagery (1960) depicts the most significant vegetation clearing within Project Area, which had taken place prior to 1960.
- Aerial imagery from 1979 depicts the first signs of residential development adjoining the Project Area in the east and further clearing to establish gravel roads throughout the Project Area.
- An increase in residential development abutting the Project Area in the east and west is depicted in 2000. Otherwise, the Project Area has remained relatively unchanged (no vegetation clearing).
- The 2020 imagery shows further residential development in the areas abutting the Project Area in the east and west.
- **Attachment A**, **Figure 1** shows the Project Area boundary over the most recent aerial photography obtained for the Project Area and surroundings in 2026 (see **Attachment A**, **Figure 1**).

Vegetation within the Project Area occurs in predominantly 'completely degraded' condition (10.09 ha, 48%) reflecting historic clearing and disturbance. The remaining vegetation comprises 'very good' (1.45 ha, 7%), 'good' (4.38 ha, 20%) and 'degraded' (5.3 ha, 25%) condition. All of the vegetation in 'very good' condition (1.45 ha), representing the highest quality vegetation within the Project Area, occurs within the ROS and will be retained and protected within the Avoidance area.

Overall, the Project Area has been substantially modified by historical land use. Only a relatively small portion comprises intact remanent native vegetation, with the majority consistent of degraded or regenerating vegetation resulting from previous clearing and disturbance.

3.1.2 Describe any existing or proposed uses for the project area.

The Project Area currently contains areas of regrowth vegetation and portions of remnant native vegetation, bare ground and sandy tracks. Historical aerial imagery shows that the Project Area has remained relatively unchanged for the last 50 years, with the most significant clearing undertaken prior to 1960. There have been no significant or substantial historical land uses occurring within the Project Area since the establishment of the access tracks that provide access to the Project Area from Placid Water Parade in the west and Peel Parade in the south.

It is likely that the Project Area was historically cleared for use as agricultural land. Currently, the Project Area has no known use.

The Project Area is proposed to be developed for residential purposes within the 16.97 ha disturbance footprint (see **Attachment A**, **Figure 2**). The proposed development is consistent with the 'Urban' and 'Urban development' zoning set out in the PRS and LPS 12 respectively.

The Project Area is located within an existing surrounding public road network, with Peel Parade forming the southern boundary and Placid Waters Parade located to the west. Informal access to the Project Area currently exists via sand tracks connecting to both roads. The existing access track from Placid Waters Parade will be upgraded and formalised as an entry point to the development, while three new access points will be constructed from Peel Parade to provide access to the Project Area.

The Project Area is located within the Mandurah East strategy area (CoM 2022). Residential, commercial and industrial development has occurred throughout areas surrounding the Project Area, and is expected to continue into the future.

3.1.3 Describe any outstanding natural features and/or any other important or unique values that applies to the project area.

The Project Area does not contain any unique values, restricted landforms or unique geological features.

A review of the Geomorphic Wetlands, Swan Coastal Plain dataset (DBCA 2026) indicates that three 'multiple use' category wetland features (unique feature identifiers (UFIs) 3257, 14572 and 14576) occur within the Project Area. They are classified as flat and basin type wetlands. Five 'conservation' category wetland features (UFIs 3255, 3408, 14573 and 15229) occur to the north and south of the Project Area, comprising the Serpentine River and Peel Inlet respectively. The location of the geomorphic wetlands in the Project Area are shown in **Attachment A**, **Figure 4**. No Ramsar wetlands are located within the Project Area, however, the Peel-Yalgorup System occurs to the south of the Project Area beyond Peel Parade (refer **Attachment A**, **Figure 4**).

No Bush Forever sites are present within or proximal to the Project Area. An Environmentally Sensitive Area (ESA) is located within the Project Area in the northern and southern extents, as shown in **Attachment A**, **Figure 5**. A portion of vegetation meeting the definition of 'native vegetation' pursuant to the EP Act occurs within this ESA. ESAs are relevant where native vegetation clearing is being considered and the potential for exemptions pursuant to the Environmental Protection Regulations 1987 (Environmental Regulations). Future clearing will be undertaken in accordance with the EP Act and Environmental Regulations.

3.1.4 Describe the gradient (or depth range if action is to be taken in a marine area) relevant to the project area.

The Project Area is relatively flat, with elevations generally ranging from 2 to 3 m in relation to the Australian Height Datum (AHD) in the central portion of the Project Area, falling away to <1 mAHD in the northern and southern portions (see **Attachment A**, **Figure 5**).

3.2 Flora and fauna

3.2.1 Describe the flora and fauna within the affected area and attach any investigations of surveys if applicable.

Flora and vegetation

Emerge Associates conducted a detailed flora and vegetation assessment for the Project Area on 12 October and 16 November 2023 (see **Attachment D**) (Emerge Associates 2024b). Flora and vegetation values were characterised to the standard required of a detailed survey in accordance with the EPA's *Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment* (EPA 2016).

A summary of findings from the flora and vegetation assessment are listed below:

- A total of 59 native and 46 non-native species were recorded during the field survey in the Project Area.
- No threatened or priority flora species were recorded within the Project Area.
- One (1) vegetation unit ('Cleared') was recorded in 'Completely degraded' condition, eight (8) ('TS', 'Er', 'ErMr', 'CoErM', 'E' and 'Kg') in 'Degraded', three (3) ('TS', 'ErMr' and 'CoErM') in 'Good' and three (3) ('TS', 'ErMr' and 'CoErM') in 'Very good' condition (see Att A - Figure 7 and 8).
- One (1) 'vulnerable' Threatened Ecological Communities (TEC), also listed as a 'priority 3' Priority Ecological Community (PEC) in Western Australia, namely, the Subtropical and Temperate Coastal Saltmarsh, occurs within the Project Area.

An assessment of likelihood of occurrence with consideration of the flora species identified by the Protected Matters Search Tool (PMST) is included within **Attachment F**, **Table 2** (**pg. 15 – 17**).

Fauna

Emerge Associates conducted a basic fauna and targeted black cockatoo assessment for the Project Area on 12 October, 27 October and 16 November 2023 (Emerge Associates 2024a). The full report is included in **Attachment B**.

The assessment identified six broad fauna habitat types within the Project Area, comprising bare ground (9.19 ha), native woodland (5.25 ha), riparian woodland (2.33 ha), scattered trees and shrubs (1.95 ha), mudflats (1.39 ha) and marsh (1.12 ha) (See **Attachment A**, **Figure 10**).

The 2023 basic fauna and targeted black cockatoo assessment identified the following key findings relevant to MNES:

- The Project Area contains 86 potential black cockatoo habitat trees, none of which were considered to be suitable for use by black cockatoos (refer **Attachment A**, **Figure 11**).
- The Project Area contains:
    - Approximately 0.17 ha of native and foraging habitat for Carnaby's black cockatoo (CBC) of which provides 0.11 ha of primary native ('high-quality') and 0.06 ha of secondary native ('high-quality') foraging habitat (see **Attachment A**, **Figure 12**).
    - Approximately 0.14 ha of native and foraging habitat for Baudin's black cockatoo (BBC) of which provides 0.14 ha of secondary native ('high-quality') foraging habitat (see **Attachment A**, **Figure 13**).
    - Approximately 0.12 ha of native and foraging habitat for forest red-tailed black cockatoo (FRTBC) of which provides 0.10 ha of primary native ('high-quality') and 0.02 ha of secondary native ('high-quality') foraging habitat (see **Attachment A**, **Figure 14**).
- Mudflat and marsh habitat units (2.51 ha) provide the highest value habitat within the Project Area for migratory shorebirds, terns and other threatened and migratory bird species. Mudflats provide the primary foraging habitat, while marsh habitat provides supplementary foraging habitat and potential high-tide roosting opportunities (**Attachment A**, **Figure 10**).
- The riparian woodland habitat adjacent to the Serpentine River may provide supplementary foraging and roosting habitat for some threatened and migratory species, including Glossy Ibis (**Attachment A**, **Figure 10**).

- The remaining habitat units (native woodland, scattered trees and shrubs, and bare ground) provide limited or opportunistic habitat for threatened and migratory bird species and are considered to be of relatively low value compared with the mudflat, marsh and riparian habitats (**Attachment A**, **Figure 10**).
- A total of 26 native fauna species were recorded within the Project Area during the survey including one migratory fauna species, *Pandion haliaetus* (Osprey). Several individuals were observed flying over the Project Area. In addition, an active nest containing a fledgling, with two adult Ospreys perched nearby, was recorded in a stag tree located approximately 5 m from the eastern boundary of the Project Area.

Migratory Shorebirds

In addition to the ecological assessments described above, Emerge Associates (2026c) conducted a targeted shorebird survey within the Project Area on 26 May, 11 June 2026 and 14 July 2026. The survey focussed on species classified as migratory shorebirds under *EPBC Act Policy Statement 3.21: Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species*. Seven (7) threatened and migratory tern species were also included in the assessment, as they utilised the same marsh and mudflat habitats present within the Project Area. The full report is provided as **Attachment C - REDACTED**.

A summary of the findings from the Emerge Associates (2026c) targeted shorebird survey has been provided below:

- One (1) migratory shorebird, *Hydroponge caspia* (Caspian tern), was recorded within the Project Area during the survey (flyover).
- The Project Area contains 2.51 ha of suitable foraging and roosting habitat for twenty-five (25) migratory shorebird species and seven (7) threatened and migratory tern species, comprising 1.12 ha of Marsh habitat in 'very good' and 'good' condition and 1.39 ha of Mudflat habitat in 'degraded' and 'completely degraded' condition (see **Attachment C - REDACTED**, **Table 1**).
- The mudflat and marsh habitat units provide the highest value habitat within the Project Area, supporting foraging opportunities for migratory shorebirds across tidal cycles through access to invertebrates, crustaceans and small fish during inundation. When exposed, these habitats, together with adjacent vegetation, are also likely to provide suitable roosting habitat.

It is noted that the targeted shorebird survey was undertaken outside the primary non-breeding season and therefore represents only a snapshot of site usage. While additional surveys during the peak non-breeding period would be required to determine the abundance and frequency of use by migratory shorebirds, the assessment concluded that the marsh and mudflat habitats may be utilised opportunistically by migratory shorebirds as part of the broader Peel-Harvey Estuary and, to a lesser extent, the Peel-Yalgorup System Ramsar site, rather than supporting a discrete or regularly occurring population.

It is also noted that Ospreys were observed during the targeted shorebird survey undertaken 14 July 2026, with several individuals recorded flying over the Project Area and utilising the same nest identified during the 2023 basic fauna and targeted black cockatoo survey (Emerge Associates 2024a). These observations were not documented in the targeted shorebird survey report, as the purpose of the survey was to assess shorebirds. Nevertheless, these observations provide additional confirmation of the continued use of the adjacent nest and surrounding habitat by Osprey.

While both the basic fauna and targeted black cockatoo assessment and the targeted shorebird survey include likelihood of occurrence assessments, a revised and comprehensive likelihood of occurrence assessment has been prepared to support this referral. The assessment consolidates the findings of all ecological surveys with information from the Protected Matters Search Tool (PMST) to provide a single, up-to-date assessment of species likely to occur within the Project Area. The assessment is provided in **Attachment F**.

3.2.2 Describe the vegetation (including the status of native vegetation and soil) within the project area.

The Project Area is located on the Swan Coastal Plain, the geomorphic unit that characterises much of the Peel region. The Swan Coastal Plain is further divided into four geomorphic subunits, which includes the Bassendean dunes system, in which the Project Area is located. The Bassendean dunes system is described as: 'Swan Coastal Plain from Busselton to Jurien. Sand dunes and sandplains with pale deep sand, semi-wet and wet soil. Banksia-paperbark woodlands and mixed heaths.'

Heddle et al. (1980) regional vegetation complex mapping indicates that the majority of the Project Area comprises the 'Vasse Complex' which is described as: "Mixture of the closed scrub of Melaleuca species fringing woodland of Eucalyptus rudis (Flooded Gum) - Melaleuca species and open forest of Eucalyptus gomphocephala (Tuart) – Eucalyptus marginata (Jarrah) - Corymbia calophylla (Marri). Will include areas dominated by Tecticornia and Sarcocornia species (Samphire) near Mandurah and south of the Capel River".

The south-western portion of the Project Area occurs within the Yoongarillup Complex, which is described as:

'Woodland to tall woodland of *Eucalyptus gomphocephala* (Tuart) with *Agonis flexuosa* in the second storey. Less consistently an open forest of *Eucalyptus gomphocephala* (Tuart) - *Eucalyptus marginata* (Jarrah) - *Corymbia calophylla* (Marri). South of Bunbury is characterized by *Eucalyptus rudis* (Flooded Gum)-Melaleuca species open forests'.

The Vasse and Yoongarillup Complex have approximately 31.4% and 35.8% of their original pre-European extent remaining across the Swan Coastal Plain (Government of Western Australia 2018).

The flora and vegetation assessment identified seven (7) native vegetation units and a cleared non-native vegetation unit over the Project Area. The vegetation types are detailed below, and the extents are shown on Figure 7 (see **Attachment A, Figure 7**):

- 2.52 ha of 'CoErM' - 'Closed low woodland of *Casuarina obesa*, *Eucalyptus rudis* and *Melaleuca* spp. over open shrubland to shrubland of *Rhagodia baccata* subsp. *baccata*, *Salicornia quinqueflora* and *Suaeda australis* over open to closed sedgeland of *Machaerina juncea*, *Juncus* spp. and *Gahnia trifida* in creeklines' (Emerge Associates 2024b).
- 0.12 ha of 'E' – 'Open woodland of *Eucalyptus marginata* or *Eucalyptus gomphocephala* over closed grassland of weeds on sandy soils' (Emerge Associates 2024b).
- 1.31 ha of 'Er' – 'Woodland of *Eucalyptus rudis* over sparse sedgeland of *Juncus* spp. and *Lepidosperma longitudinale* over grassland of weeds on sandy soils' (Emerge Associates 2024b).
- 1.61 ha of 'ErCoTS; - 'Low woodland to open woodland of *Eucalyptus rudis* and *Casuarina obesa* over sparse shrubland to shrubland of *Salicornia quinqueflora*, *Tecticornia* spp. and *Suaeda australis* and sedgeland of *Lepidosperma longitudinale* and *Juncus* spp. over grassland of weeds on sandy soils' (Emerge Associates 2024b).
- 3.75 ha of 'ErMr' – 'Woodland of *Eucalyptus rudis* and *Melaleuca rhaphiophylla* over sparse shrubland and open to closed sedgeland of *Machaerina juncea*, *Lepidosperma longitudinale* and *Juncus* spp. over open forbland of *Cycnogeton lineare* and open to closed grassland of weeds in drainage lines and depressions' (Emerge Associates 2024b).
- 0.21 ha of 'Kg' – 'Shrubland of *Kunzea glabrescens* over grassland of weeds on sandy soils' (Emerge Associates 2024b).
- 1.61 ha of 'TS' – 'Low open to closed shrubland of *Salicornia quinqueflora*, *Tecticornia* spp., *Suaeda australis* and *Frankenia pauciflora* over open forbland to forbland of *Triglochin mucronata*, **Cotula turbinata* and grassland of weeds (or layer absent) on low lying clay adjacent to the river' (Emerge Associates 2024b).
- 10.09 ha of 'Cleared' – 'Disturbed, cleared land dominated by non-native species and bare ground' (Emerge Associates 2024b).

Vegetation condition within the Project Area was assessed in accordance with the Keighery (1994) methodology and is shown in **Attachment A, Figure 8**. The majority of vegetation identified within the Project Area was assessed to be in 'Completely degraded' condition (10.09 ha), followed by vegetation present in 'Degraded' (5.30 ha), 'Good' (4.38 ha) and 'Very good' (1.45 ha) condition and is shown in **Attachment A, Figure 8** (Emerge Associates 2024a).

3.3 Heritage

3.3.1 Describe any Commonwealth Heritage Places Overseas or other places recognised as having heritage values that apply to the project area.

A search of the Australian Heritage Database was undertaken for the Project Area. No Commonwealth Heritage Places were identified to occur within the Project Area.

3.3.2 Describe any Indigenous heritage values that apply to the project area.

The Project Area is located on Pindjarup country, which spans across the south-west of Western Australia (AIATSIS 2026). The Bindjareb, Binjareb, Pinjarup or Pindjarup people are an indigenous Noongar people that occupy this region. Pindjarup country is distinguished by an extensive network of coastal estuaries and wetlands that supported abundant natural resources, influencing the seasonal activities, settlement patterns, and cultural traditions of the Pindjarup people (South Australian Museum 2026).

The Aboriginal Heritage Inquiry System (AHIS) is maintained pursuant to Section 38 of the *Aboriginal Heritage Act 1972* (AH Act) by the Department of Planning, Lands and Heritage (DPLH), containing information on Registered Aboriginal Heritages Sites and Other Heritage Places throughout Western Australia.

According to the DPLH dataset for Aboriginal Heritage Places (DPLH-001), historic Aboriginal heritage place Serpentine River (ID 3582) occurs to the north of the northern boundary of the Project Area. A small portion of Serpentine River (ID 3582) falls within the Project Area, however, it is contained within the Avoidance area and will not be disturbed during implementation of the Proposed Action. In addition, Coodanup Camp (ID 3437) was found to marginally intersect the Project Area on the western boundary (refer **Attachment A, Figure 6**). Serpentine River is a ritual/ceremonial; creation/dreaming narrative type registered site. Coodanup Camp is a Camp/Water source lodged place.

Two ethnographic and archaeological surveys have been conducted over the Project Area and local surrounds within the last 50 years (DPLH 2026), including:

- 102670: Preliminary Report on the Survey of Aboriginal Areas of Significance in the Perth Metropolitan & Murray River Regions (July 1985).
- 22366: Indigenous heritage of the Peel - Harvey Region: a review of previous research and archival data for phase 1 of the Peel Cultural Landscape Assessment Project.

No Registered Aboriginal Heritage Sites are located within the disturbance footprint of the Project Area to the extent that impacts would arise from development works. A lodged Aboriginal heritage place marginally intersects the Project Area within the western boundary and will be reviewed again as part of the subdivision process, although it is understood that it largely occurs outside of the Project Area.

3.4 Hydrology

3.4.1 Describe the hydrology characteristics that apply to the project area and attach any hydrological investigations or surveys if applicable. *

Wetlands

A review of the Geomorphic Wetlands, Swan Coastal Plain dataset indicated that three ‘multiple use’ category wetland features (UFIs 3257, 14572 and 14576) occur within the Project Area (DBCA 2025b). Multiple use wetlands are wetlands that retain limited natural values but support wetland hydrological function/s. They are classified as flat and basin type wetlands. Five ‘conservation’ category wetland features (UFIs 3255, 3408, 14573 and 15229) occur to the north and south of the Project Area, comprising the Serpentine River and Peel Inlet respectively. The location of the geomorphic wetlands in the Project Area is shown in **Attachment A, Figure 4**.

Surface Water

A review of the Department of Water and Environmental Regulation’s (DWER) Hydrography Linear dataset (2020) indicates are no existing natural surface water features located within the Project Area. However, the Project Area is located within multiple use wetlands (UFI 3257, UFI 4576 and UFI 14572) which are located at the northern and southern boundaries of the Project Area (refer **Attachment A, Figure 4**). While they do not occur within the Project Area, there are two conservation wetlands (UFI 3255 and UFI 14573) that occur beyond the northern and southern extents, associated with the Serpentine River and the Peel Harvey Estuary respectively, as shown in **Attachment A, Figure 4**.

Groundwater

Groundwater generally flows northward (towards the Serpentine River) and southward (towards the (Peel-Harvey Estuary). There are no DWER monitoring bores within the Project Area, however previous groundwater investigations by Douglas Partners (2015) and recent monitoring of six (6) bores by Emerge Associates (in 2023) onsite indicates that the maximum groundwater level within the site ranges from between 1.5 m and 3 m BGL. This indicates that the groundwater levels at approximately 0.5 mAHD and suggests that some portions of the Project Area immediately adjacent/connected to the Serpentine River may intersect seasonal groundwater.

4. Impacts and mitigation

4.1 Impact details

Potential Matters of National Environmental Significance (MNES) relevant to your proposed action area.

EPBC Act section	Controlling provision	Impacted	Reviewed
S12	World Heritage	No	Yes
S15B	National Heritage	No	Yes
S16	Ramsar Wetland	No	Yes
S18	Threatened Species and Ecological Communities	Yes	Yes
S20	Migratory Species	Yes	Yes
S21	Nuclear	No	Yes
S23	Commonwealth Marine Area	No	Yes
S24B	Great Barrier Reef	No	Yes
S24D	Water resource in relation to large coal mining development or coal seam gas	No	Yes
S26	Commonwealth Land	No	Yes
S27B	Commonwealth Heritage Places Overseas	No	Yes
S28	Commonwealth or Commonwealth Agency	No	Yes

4.1.1 World Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.1.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.1.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as there are no World Heritage sites listed within or in close proximity to the Project Area.

4.1.2 National Heritage

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.2.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.2.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as there are no National Heritage sites listed within or in close proximity to the Project Area.

4.1.3 Ramsar Wetland

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Ramsar wetland
No	No	Peel-Yalgorup System

4.1.3.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.3.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

The Proposed Action is not anticipated to have a direct and/or indirect impact to Ramsar Wetland ‘Peel-Yalgorup System’.

The Peel-Yalgorup System occurs south of the Project Area (outside the Project Area) and is separated from the Project Area by an existing road, Peel Parade (refer **Attachment A, Figure 1**). Notwithstanding this, an Environmental Assessment Management Plan (EAMP) has been prepared to provide management measures for the environmental values and attributes present within and proximal to the Project Area during subdivision, development and handover (Emerge Associates 2026a).

The EAMP provides a framework for the key environmental management requirements to be addressed for the Proposed Action. This includes preventing impacts associated with the subdivision and development beyond the disturbance footprint, avoiding unplanned impacts to vegetation, fauna habitat, and waterways. Additionally, a Construction Environmental Management Plan (CEMP) and Fauna Management Plan (FMP) will be prepared as part of the subdivision approval condition requirements and will support the existing management plans in protecting the environmental values within and outside of the Project Area, including the Peel-Yalgorup System.

The EAMP identifies the potential environmental issues and risks to be managed, and management measures that will prevent any unplanned direct or indirect impacts to the Peel-Yalgorup System, including:

- Preventing the direct/indirect impacts resulting from clearing of flora and vegetation, and fauna habitat beyond the disturbance footprint through demarcation and delineation, and the installation of Project Area boundary fencing.
- Construction measures to control onsite risks during active civil operations, including:
    - Use of water carts during all earthworks phases to suppress dust emissions (prevent dust and sediments from entering the wetland) with all machinery operations restricted to standard daylight hours in accordance with local noise regulations.
    - Installation of perimeter silt and windbreak fencing and stabilised construction entry/exit points prior to clearing to prevent sand and nutrient runoff from escaping the Project Area.
    - Enforcement of "clean in, clean out" protocols for all mobile plant and machinery to prevent the introduction or spread of Phytophthora Dieback and declared weed species.
    - Use of secure, wind-proof waste bins across the civil footprint to contain construction debris and prevent litter from blowing into the wetland.
- To avoid the displacement or mortality of local fauna present within the Project Area during the clearing phase, pre-clearing habitat tree inspections will occur, and fauna spotters and suitably qualified zoologists will be present to halt clearing until fauna have moved out of the clearance area.
- Implementing a weed management program that includes regular monitoring, targeted control of declared pests and Weeds of National Significance, and the use of appropriate physical barriers (including pathways, roads, retaining walls and managed landscape buffers) and maintenance practices to minimise weed establishment, spread and encroachment within and beyond the Project Area.

Additionally, a Subdivision Water Management Report (SWMR) has been prepared to support the development of the Project Area, which details the water management approach intended to satisfy the requirements of SPP 2.9 and the general expectations of the DWER (see **Attachment G**). The SWMR provisions management measures to ensure that the existing hydrological regime is maintained during subdivision and following completion of the development.

The EPA's objective for inland waters is to maintain groundwater and surface water hydrological regimes and water quality to protect environmental values. State and regional policy frameworks, including the State Water Strategy, SPP 2.9, Better Urban Water Management and the Peel-Harvey Water Quality Improvement Plan, require the application of integrated water cycle management and water sensitive urban design (WSUD) principles to maintain or restore natural hydrological processes and protect wetland and

waterway values. In accordance with these requirements, Emerge prepared the SWMR (see **Attachment G**) to support the Proposed Action, with the overarching objective of maintaining the existing site hydrology during and after development by infiltrating runoff at source.

Surface water management within the Project Area will follow a water sensitive design (WSD) approach and feature (but is not limited to) soakwells and at-lot scale infiltration (at source), bio-retention areas (BRAs) and vegetated swales to treat small rainfall events (first 15 mm), and flood storage areas (FSAs) for major rainfall events. The proposed groundwater management strategy is designed to maintain groundwater quality and protect the existing hydrological regime while ensuring the structural integrity of the development. Stormwater generated within the Project Area, including runoff from the 1% annual exceedance probability (AEP) rainfall event, will be retained and treated onsite through a combination of lot-scale infiltration measures and an integrated drainage network designed to promote at-source infiltration and maintain the existing hydrological regime. The system incorporates vegetated swales, gross pollutant traps, BRAs and FSAs to manage water quantity and quality, support nutrient removal, and minimise offsite impacts.

Long-term hydrological management will include routine maintenance of drainage infrastructure and monitoring of bio-retention vegetation to ensure stormwater treatment and infiltration functions operate effectively. Following a two-year maintenance period and confirmation that the drainage network is performing in accordance with the SWMR, responsibility for public drainage assets will be transferred to the CoM.

Collectively, the proposed hydrological management measures are designed to maintain pre-development hydrological conditions, protect water quality and minimise offsite discharge, thereby mitigating the potential for unplanned direct or indirect impacts to the environmental values of the Peel-Yalgorup System.

The implementation of the Proposed Action is not anticipated to result in any direct impacts to the Peel-Yalgorup System. Management measures outlined in the EAMP, CEMP, FMP and SWMR will ensure that any unplanned indirect impacts to the Peel-Yalgorup System are unlikely to occur. Notwithstanding this, the significant impact guidelines identify significant impact criteria for wetlands of international importance to assist in determining if environmental impacts of a proposed action are likely to be significant.

A significant impact assessment was therefore undertaken for the Peel-Yalgorup System using the ‘Significant impact criteria’ and is provided in **Attachment H**, **Section 2**.

The Proposed Action is not anticipated to result in significant impacts to the Peel-Yalgorup System, nor is it likely to result in any direct and/or indirect impacts in the first instance.

4.1.4 Threatened Species and Ecological Communities

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Threatened species

Direct impact	Indirect impact	Species	Common name
No	No	Andersonia gracilis	Slender Andersonia
Yes	No	Arenaria interpres	Ruddy Turnstone
No	No	Botaurus poiciloptilus	Australasian Bittern
No	No	Caladenia huegelii	King Spider-orchid, Grand Spider-orchid, Rusty Spider-orchid
Yes	No	Calidris acuminata	Sharp-tailed Sandpiper
Yes	No	Calidris canutus	Red Knot, Knot
Yes	No	Calidris ferruginea	Curlew Sandpiper
Yes	No	Calidris tenuirostris	Great Knot
Yes	No	Calyptorhynchus banksii naso	Forest Red-tailed Black-Cockatoo, Karrak
No	No	Caretta caretta	Loggerhead Turtle
Yes	No	Charadrius leschenaultii	Greater Sand Plover, Large Sand Plover
Yes	No	Charadrius mongolus	Lesser Sand Plover, Mongolian Plover
No	No	Chelonia mydas	Green Turtle
No	No	Dasyurus geoffroii	Chuditch, Western Quoll
No	No	Dermochelys coriacea	Leatherback Turtle, Leathery Turtle, Luth
No	No	Diomedea amsterdamensis	Amsterdam Albatross
No	No	Diomedea dabbenena	Tristan Albatross
No	No	Diomedea epomophora	Southern Royal Albatross
No	No	Diomedea exulans	Wandering Albatross
No	No	Diomedea sanfordi	Northern Royal Albatross
No	No	Diuris drummondii	Tall Donkey Orchid

Direct impact	Indirect impact	Species	Common name
No	No	Diuris micrantha	Dwarf Bee-orchid
No	No	Diuris purdiei	Purdie's Donkey-orchid
No	No	Drakaea elastica	Glossy-leafed Hammer Orchid, Glossy-leaved Hammer Orchid, Warty Hammer Orchid
No	No	Drakaea micrantha	Dwarf Hammer-orchid
No	No	Leipoa ocellata	Malleefowl
No	No	Limosa lapponica menzbieri	Northern Siberian Bar-tailed Godwit, Russkoye Bar-tailed Godwit
Yes	No	Limosa limosa	Black-tailed Godwit
No	No	Macronectes giganteus	Southern Giant-Petrel, Southern Giant Petrel
No	No	Macronectes halli	Northern Giant Petrel
No	No	Natator depressus	Flatback Turtle
No	No	Neophoca cinerea	Australian Sea-lion, Australian Sea Lion
Yes	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Pachyptila turtur subantarctica	Fairy Prion (southern)
No	No	Phaethon rubricauda westralis	Red-tailed Tropicbird (Indian Ocean), Indian Ocean Red-tailed Tropicbird
No	No	Pristis pristis	Largetooth Sawfish, Freshwater Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish
No	No	Pseudocheirus occidentalis	Western Ringtail Possum, Ngwayir, Womp, Woder, Ngoor, Ngoolangit
No	No	Rostratula australis	Australian Painted Snipe
No	No	Sphyrna lewini	Scalloped Hammerhead
Yes	No	Sternula nereis nereis	Australian Fairy Tern
No	No	Synaphea sp. Fairbridge Farm (D.Papenfus 696)	Selena's Synaphea
No	No	Synaphea sp. Serpentine (G.R.Brand 103)	
No	No	Thalassarche cauta	Shy Albatross

Direct impact	Indirect impact	Species	Common name
No	No	Thalassarche impavida	Campbell Albatross, Campbell Black-browed Albatross
No	No	Thalassarche melanophris	Black-browed Albatross
No	No	Thalassarche steadi	White-capped Albatross
No	No	Thelymitra variegata	Queen of Sheba
Yes	No	Tringa nebularia	Common Greenshank, Greenshank
Yes	No	Zanda baudinii	Baudin's Cockatoo, Baudin's Black-Cockatoo, Long-billed Black-cockatoo
Yes	No	Zanda latirostris	Carnaby's Black Cockatoo, Short-billed Black-cockatoo

Ecological communities

Direct impact	Indirect impact	Ecological community
No	No	Banksia Woodlands of the Swan Coastal Plain ecological community
Yes	No	Subtropical and Temperate Coastal Saltmarsh
No	No	Tuart (Eucalyptus gomphocephala) Woodlands and Forests of the Swan Coastal Plain ecological community

4.1.4.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.4.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

A Likelihood of Occurrence assessment was completed for all EPBC Act listed threatened species identified by the PMST, incorporating desktop investigations and the results of ecological assessments undertaken for the Project Area (**Attachment B, C - REDACTED** and **D**). This assessment considered desktop-based searches and results of comprehensive field surveys provided as **Attachment F**.

The assessment discounted the likelihood of the majority of the EPBC Act listed threatened fauna species identified by the PMST (43 total), with 17 assessed as either 'likely' or 'possible' to occur within the Project Area. Of the 17 threatened species, 14 are listed under the EPBC Act as both threatened and migratory. Consistent with the *Significant Impact Guidelines 1.1* (DCCEEW 2021), these species have been presented and assessed under the threatened species section of this referral, as the threatened species significant impact criteria represent the more stringent assessment framework. Accordingly, these species have not been separately assessed under the migratory species criteria to avoid duplication. These species and corresponding listings under the EPBC Act include:

- CBC (*Zanda latirostris*, previously known as *Calyptorhynchus latirostris*) - Endangered
- BBC (*Calyptorhynchus baudinii*) - Endangered
- FRTBC (*Calyptorhynchus banksia naso*) - Vulnerable
- 14 threatened and migratory shorebird and tern species:
    - Ruddy turnstone (*Arenaria interpres*) - Vulnerable (Migratory)
    - Sharp-tailed sandpiper (*Calidris acuminata*) - Vulnerable (Migratory)
    - Red knot (*Calidris canutus*) - Endangered (Migratory)
    - Curlew Sandpiper (*Calidris ferruginea*) - Critically Endangered (Migratory)
    - Great sand plover (*Charadrius leschenaultii*) - Vulnerable (Migratory)
    - Lesser sand plover (*Charadrius mongolus*) - Endangered (Migratory)
    - Great knot (*Calidris tenuirostris*) - Vulnerable (Migratory)
    - Black-tailed godwit (*Limosa limosa*) - Endangered (Migratory)
    - Eastern curlew (*Numenius madagascariensis*) - Critically Endangered (Migratory)
    - Grey Plover (*Pluvialis squatarola*) - Vulnerable (Migratory)
    - Common Greenshank (*Tringa nebularia*) - Endangered (Migratory)
    - Terek sandpiper (*Xenus cinereus*) – Vulnerable (Migratory)
    - Little Tern (*Sternula albifrons*) - Vulnerable (Migratory)
    - Australian fairy tern (*Sternula nereis nereis)* - Vulnerable

Only one (1) threatened ecological community (TEC) identified within the PMST database search, namely the Saltmarsh TEC, was recorded within the Project Area, with the remaining five (5) not considered 'possible' or 'likely' to occur within the Project Area.

CBC (*Zanda latirostris*)

The Proposed Action will result in the clearing of approximately 0.17 ha of native CBC foraging habitat, which comprises 0.11 ha of primary native ('high-quality native foraging habitat') and 0.06 ha of secondary native ('high-quality native foraging habitat'). The Proposed Action will also remove 80 potential nesting trees, none of which were considered to be suitable for use by CBC or support nesting hollows that could be used for breeding by CBC.

The direct impact of the Proposed Action on the CBC within the Project Area and the associated loss of suitable habitat within the disturbance footprint is shown in Figure 11 and 12 (see **Attachment A**, **Figure 11** and **12**).

BBC (*Calyptorhynchus baudinii*)

The Proposed Action will result in the clearing of approximately 0.14 ha of native BBC foraging habitat, which comprises 0.14 ha of secondary native ('high-quality' native foraging habitat) foraging habitat. The Proposed Action will also remove 80 potential nesting trees, none of which were considered to be suitable for use by BBC or support nesting hollows that could be used for breeding by BBC.

The direct impact of the Proposed Action on the BBC within the Project Area and the associated loss of suitable habitat within the disturbance footprint is shown in Figure 11 and 13 (see **Attachment A**, **Figure 11** and **13**).

FRTBC (*Calyptorhynchus banksia naso*)

The Proposed Action will result in the clearing of approximately 0.12 ha of native FRTBC foraging habitat, which comprises 0.10 ha of primary native ('high-quality' native foraging habitat) and 0.02 ha of secondary native ('high-quality' native foraging habitat) foraging habitat. The Proposed Action will also remove 80 potential nesting trees, none of which were considered to be suitable for use by FRTBC or support nesting hollows that could be used for breeding by FRTBC.

The direct impact of the Proposed Action on the FRTBC within the Project Area and the associated loss of suitable habitat within the disturbance footprint is shown in Figure 11 and 14 (see **Att A**, **Figure 11** and **14**).

Threatened and migratory shorebird and tern species

The Proposed Action result in the clearing of approximately 0.1 ha of foraging habitat suitable for 14 species of migratory and threatened shorebirds and tern, comprised of 0.05 ha of mudflat and 0.05 ha of marsh fauna habitat (refer **Attachment A**, **Figure 17**).

While not classified as shorebirds as per the EPBC Act Policy Statement 3.21: Industry guidelines for avoiding, assessing and mitigating impacts on EPBC Act listed migratory shorebird species, Emerge Associates (2026) concluded that the Australian fairy tern and little tern utilise the same marsh and mudflat habitats for foraging and roosting as shorebirds. Accordingly, these tern species have been assessed alongside the shorebird species, as the Proposed Action has the potential to affect the same habitat values used by both groups.

The direct impact of the Proposed Action on threatened and migratory shorebird and tern species within the Project Area and associated loss of suitable habitat within the disturbance footprint is shown in **Attachment A, Figure 17**).

Saltmarsh TEC

The Proposed Action within the Project Area will impact on Saltmarsh TEC through the clearing of approximately 0.31 ha of the total 1.87 ha extent mapped within the Project Area.

The direct impact of the Proposed Action on the Saltmarsh TEC within the Project Area and the associated loss of fauna habitat within the disturbance footprint is shown in Figure 9 (see **Attachment A**, **Figure 9**).

Conclusion

In conclusion, the potential impacts of the Proposed Action on the CBC, BBC, FRTBC, 14 threatened and migratory shorebird and tern species, and the Saltmarsh TEC are all unlikely to result in a significant or significant residual impact, as discussed in **Section 4.1.4.6**.

All potential indirect impacts from, machinery, noise, dust and disease are considered a temporary potential impact as they are only likely to become an issue during construction (and will be mitigated through the implementation of the CEMP, EAMP, FMP, SWMR and FWMP).

4.1.4.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.4.6 Describe why you do not consider this to be a Significant Impact. *

Black cockatoo habitat

The impact on CBC, BBC and FRTBC has been initially assessed against the referral guidelines, and in this regard:

- The Proposed Action will not result in the loss of more than 1 ha of high-quality foraging habitat for either CBC (0.17 ha), BBC (0.14 ha) or FRTBC (0.12 ha) (refer **Attachment A**, **Figure 12 – 14**).
- The Proposed Action will not result in the loss in any exotic foraging habitat for either CBC, BBC or FRTBC (refer **Attachment A**, **Figure 12 – 14**).
- The Proposed Action will result in the removal of 80 potential habitat trees. However, targeted ecological assessment and hollow inspection confirmed that none of these trees contain hollows suitable for breeding, and therefore they do not currently provide breeding habitat. An additional 6 potential habitat trees will be retained within the Avoidance area (refer **Attachment A, Figure 11**).

Accordingly, the proposed action will not exceed the referral guideline thresholds for foraging habitat, nor will it result in the loss of breeding habitat. The impacts are therefore limited to the removal of a small area of foraging habitat (high-quality and exotic) for CBC, BBC and FRTBC.

Saltmarsh TEC

The Project Area contains 1.87 ha of the Saltmarsh TEC, which is listed as a Vulnerable ecological community under the EPBC Act. While Vulnerable ecological communities are MNES, they are not assessed under the significant impact guidelines under the same criteria and have higher thresholds for a significant impact than that applied to Endangered or Critically Endangered ecological communities. According to the significant impact guidelines, a significant impact to the Saltmarsh TEC must bring about a 'substantial' reduction, loss or change to the TEC.

The Proposed Action will result in the removal of approximately 0.31 ha (16.6%) of degraded Saltmarsh TEC (least intact portion) within the Project Area, with the remaining 1.57 ha (83.4%) of Saltmarsh TEC present in ‘Very good’ and ‘Good’ condition retained and managed within the ROS which forms part of the Avoidance area.

Given the limited scale of impact, the non-contiguous and degraded nature of the portion being removed, the retention of the majority of the TEC present in ‘very good’ and ‘good’ condition, and the provisioning of a Foreshore and Wetland Management Plan (FWMP) (Emerge Associates 2026b) in addition to the EAMP, CEMP, FMP and SWMR to prevent any 'substantial' change to the ecological function, integrity or viability of the TEC, the Proposed Action is not expected to result in a significant impact on the Saltmarsh TEC and is therefore not considered further in the assessment of significant impacts under the EPBC Act.

Threatened and migratory shorebird and tern species

The Significant Impact Guidelines 1.1 (DCCEEW 2021) identify significant impact criteria for Critically endangered, Endangered, and Vulnerable ecological communities and flora and fauna species to assist in determining if the environmental impacts of a proposed action are likely to be significant.

An assessment of the anticipated impacts of the proposed action to the CBC, FRTBC, BBC, and 14 threatened and migratory shorebird and tern species using the Critically endangered and endangered species and Vulnerable species impact criteria is provided in **Attachment H**. It is noted that the 14 species listed under the EPBC Act as both threatened and migratory have been assessed under the threatened species criteria only as the threatened species significant impact criteria represent the more stringent assessment framework. Accordingly, these species have not been separately assessed under the migratory species criteria to avoid duplication.

The anticipated residual impacts on black cockatoos, and the 14 threatened and migratory shorebird and tern species as a result of the Proposed Action are not considered to represent a significant residual impact.

4.1.4.7 Do you think your proposed action is a controlled action? *

No

4.1.4.9 Please elaborate why you do not think your proposed action is a controlled action. *

The Proposed Action is not considered to be a controlled action under the EPBC Act because it is unlikely to have a significant impact on any relevant MNES, namely CBC, BBC, FRTBC, and 14 species of threatened and migratory shorebird and tern species.

Potential impacts to CBC, BBC and FRTBC were assessed against the Referral guideline for three WA threatened black cockatoo species (DAWE 2022) and the EPBC Act Significant Impact Guidelines 1.1, with the detailed assessment provided in **Attachment H, Section 3**. The Proposed Action will result in the permanent loss of approximately 0.17 ha, 0.14 ha and 0.12 ha of high-quality foraging habitat for CBC, BBC and FRTBC, respectively. These impacts are substantially below the Commonwealth referral guideline thresholds of 1 ha of high-quality foraging habitat, 1 ha of exotic foraging habitat and 10 ha of low-quality foraging habitat. Consequently, the loss of foraging habitat is not considered likely to result in a significant impact.

The Proposed Action will also remove 80 potential nesting trees. However, none of these trees contain suitable nesting hollows and therefore do not provide breeding habitat for black cockatoos. Six potential nesting trees will be retained within the avoidance area, no black cockatoos or evidence of breeding were recorded during ecological surveys, and substantial foraging, roosting and breeding habitat occurs throughout the surrounding landscape (**Attachment A, Figure 19**). Accordingly, the Proposed Action is not expected to reduce the availability of breeding habitat, disrupt breeding, or adversely affect the long-term viability or recovery of CBC, BBC or FRTBC. The assessment concludes that the Proposed Action is unlikely to result in a significant impact or significant residual impact on any black cockatoo species (**Attachment H, Section 3**).

The Proposed Action will also result in the permanent loss of only 0.10 ha of suitable foraging habitat for 14 threatened and migratory shorebird and tern species. Ecological surveys did not record any of these species within the Project Area, and all were assessed as having only a possible likelihood of occurrence. The habitat proposed for removal comprises a very small area of marginal marsh and mudflat habitat, while approximately 96% of suitable habitat (2.41 ha), including the majority of the highest quality habitat, will be retained and protected within the ROS which forms part of the Avoidance area. The retained habitat remains contiguous with the extensive habitats of the Serpentine River, Peel-Harvey Estuary and Peel-Yalgorup System. Consequently, the Proposed Action is not expected to adversely affect habitat critical to the survival or recovery of these species, substantially reduce habitat availability, disrupt feeding, roosting or migration, or otherwise meet the significant impact criteria for threatened species. The detailed assessment is provided in **Attachment H**, **Section 3**.

The Proposed Action has also been designed to avoid and minimise indirect impacts through the implementation of the EAMP, CEMP, FMP, FWMP and SWMR. These management measures will avoid indirect impacts associated with clearing, construction activities, stormwater, hydrology, water quality, weeds, dieback, dust, noise and lighting, ensuring that impacts remain localised, temporary during construction where applicable, and of low magnitude.

Having regard to the nature, scale and duration of the predicted impacts, together with the avoidance, mitigation and management measures incorporated into the Proposed Action, the significance assessments provided in **Attachment H, Section 3** conclude that the Proposed Action is unlikely to have a significant impact on any relevant MNES. Accordingly, the Proposed Action is not considered to be a controlled action under the EPBC Act.

4.1.4.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Avoidance

The primary avoidance of environmental values associated with the Proposed Action has occurred through strategic land use planning processes, rather than through subdivision design. The Project Area is zoned 'Urban' and 'ROS' under the PRS and 'Urban Development' and 'ROS' under the CoM LPS 12. The boundaries between land identified for urban development and adjoining ROS were established through these statutory planning processes, which considered environmental values and were referred to the EPA during their preparation. The EPA did not require formal assessment of the planning proposals, thereby allowing the planning framework to proceed with the current urban and conservation boundaries.

Consistent with the PRS and LPS 12, the Proposed Action confines development to land identified for urban development and excludes land reserved as ROS. The proponent has not determined these strategic avoidance boundaries but has designed the subdivision within the established planning framework.

Beyond this strategic avoidance, the Proposed Action incorporates additional avoidance within the urban zoned land, providing a total of 4.26 ha Avoidance area, comprising both the ROS and local open space.

The Avoidance area retains the majority of the highest quality portion of the Saltmarsh TEC and fauna habitat within the Project Area, including:

- 1.57 ha (83.4%) of Saltmarsh TEC present in 'very good' and 'good' condition
- Retention of six (6) potential nesting trees for black cockatoos
- 2.41 ha (96%) suitable foraging habitat for 14 threatened and migratory shorebird and tern species.

The portion of TEC and retained habitats are generally larger, more contiguous and in better condition than the small areas proposed for removal, and will remain connected to the extensive coastal, estuarine and wetland habitats of the Peel-Harvey Estuary and Peel-Yalgorup System. Additional opportunities to retain vegetation and habitat will also be considered during detailed landscape design.

Mitigation measures

In addition to the described avoidance area, the Proposed Action incorporates a 5.36 ha foreshore area adjacent to the Serpentine River that establishes a setback between the development footprint and the Peel-Harvey Estuary (see **Attachment A**, **Figure 4**). The foreshore area comprises the 4.26 ha Avoidance area and a 0.61 ha interface area, the extent of which was determined through a biophysical assessment documented in the FWMP (Emerge Associates 2026). The FWMP has been prepared to guide the long-term protection and management of the foreshore's environmental and cultural values while accommodating passive recreational use. Revegetation and additional tree retention within the foreshore area also have potential to provide additional habitat for threatened fauna species, particularly black cockatoos. Given landscape plans are at the conceptual phase, additional opportunities for retention (i.e. impact avoidance) may also be considered upon detailed design.

The potential impacts to MNES threatened species and will also be mitigated and managed in accordance with standard practice construction management mitigation measures to be implemented to minimise potential impacts to fauna and vegetation, including but not limited to:

- Planting of landscape areas with commercially available, and locally occurring native species.
- Mandatory site inductions for construction staff.
- Pre-start civil contractor briefings to highlight no-go areas.
- Pre-works fauna inspections and fauna spotter onsite during construction by suitably qualified zoologist.
- Adoption of construction vehicle speed limits.
- Directional clearing to encourage bird dispersal.
- Use of clean machinery.
- Required imported soil will be from certified sources free of pathogens and disease.

- Fencing/demarcation of retained vegetation (the avoidance area), including the potential establishment of a tree protection zone for trees determined to be conservation significant, such as the one potential BC nesting tree.
- Restricting access of vehicles to the construction site to minimise the risk of weed spread or introduction.
- Use of water carts and ground stabilisation to minimise wind-blown dust emissions.

The potential impacts (unplanned direct or indirect) to MNES will also be mitigated and managed in accordance with the management measures outlined in the EAMP, CEMP, FMP and SWMR.

4.1.4.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

The Proposed Action does not have significant residual impacts on CBC, FRTBC, BBC, 14 threatened and migratory shorebird and tern species and/or the Saltmarsh TEC, and therefore offsets have not been considered.

4.1.5 Migratory Species

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

Direct impact	Indirect impact	Species	Common name
Yes	No	Actitis hypoleucos	Common Sandpiper
No	No	Anous stolidus	Common Noddy
No	Yes	Apus pacificus	Fork-tailed Swift
Yes	No	Arenaria interpres	Ruddy Turnstone
No	No	Balaenoptera edeni	Bryde's Whale
Yes	No	Calidris acuminata	Sharp-tailed Sandpiper
Yes	No	Calidris alba	Sanderling
Yes	No	Calidris canutus	Red Knot, Knot
Yes	No	Calidris falcinellus	Broad-billed Sandpiper
Yes	No	Calidris ferruginea	Curlew Sandpiper
Yes	No	Calidris melanotos	Pectoral Sandpiper
No	No	Calidris pugnax	Ruff
Yes	No	Calidris ruficollis	Red-necked Stint
Yes	No	Calidris subminuta	Long-toed Stint
Yes	No	Calidris tenuirostris	Great Knot
No	No	Caperea marginata	Pygmy Right Whale
No	No	Caretta caretta	Loggerhead Turtle
Yes	No	Charadrius leschenaultii	Greater Sand Plover, Large Sand Plover
Yes	No	Charadrius mongolus	Lesser Sand Plover, Mongolian Plover
No	No	Chelonia mydas	Green Turtle
No	No	Dermochelys coriacea	Leatherback Turtle, Leathery Turtle, Luth
No	No	Diomedea amsterdamensis	Amsterdam Albatross

Direct impact	Indirect impact	Species	Common name
No	No	Diomedea dabbenena	Tristan Albatross
No	No	Diomedea epomophora	Southern Royal Albatross
No	No	Diomedea exulans	Wandering Albatross
No	No	Diomedea sanfordi	Northern Royal Albatross
No	No	Gallinago megala	Swinhoe's Snipe
No	No	Gallinago stenura	Pin-tailed Snipe
No	No	Lamna nasus	Porbeagle, Mackerel Shark
Yes	No	Limosa lapponica	Bar-tailed Godwit
Yes	No	Limosa limosa	Black-tailed Godwit
No	No	Macronectes giganteus	Southern Giant-Petrel, Southern Giant Petrel
No	No	Macronectes halli	Northern Giant Petrel
No	No	Megaptera novaeangliae	Humpback Whale
No	No	Mobula alfredi	Reef Manta Ray, Coastal Manta Ray
No	No	Mobula birostris	Giant Manta Ray
No	No	Motacilla cinerea	Grey Wagtail
No	No	Natator depressus	Flatback Turtle
Yes	No	Numenius madagascariensis	Eastern Curlew, Far Eastern Curlew
No	No	Numenius minutus	Little Curlew, Little Whimbrel
Yes	No	Numenius phaeopus	Whimbrel
Yes	No	Pandion haliaetus	Osprey
No	No	Phaethon rubricauda	Red-tailed Tropicbird
Yes	No	Pluvialis fulva	Pacific Golden Plover
No	No	Pristis pristis	Largetooth Sawfish, Freshwater Sawfish, River Sawfish, Leichhardt's Sawfish, Northern Sawfish
No	No	Thalassarche cauta	Shy Albatross

Direct impact	Indirect impact	Species	Common name
No	No	Thalassarche impavida	Campbell Albatross, Campbell Black-browed Albatross
No	No	Thalassarche melanophris	Black-browed Albatross
No	No	Thalassarche steadi	White-capped Albatross
Yes	No	Tringa brevipes	Grey-tailed Tattler
Yes	No	Tringa glareola	Wood Sandpiper
Yes	No	Tringa nebularia	Common Greenshank, Greenshank
Yes	No	Tringa stagnatilis	Marsh Sandpiper, Little Greenshank
No	No	Tringa totanus	Common Redshank, Redshank

4.1.5.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

Yes

4.1.5.2 Briefly describe why your action has a direct and/or indirect impact on these protected matters. *

A Likelihood of Occurrence assessment was completed for all EPBC Act listed migratory species identified by the PMST, incorporating desktop investigations and the results of ecological assessments undertaken for the Project Area (**Attachment B**, **C - REDACTED** and **D**). The assessments discounted the likelihood of 25 of the 59 migratory species identified by the PMST, with 32 species assessed as having a 'possible' likelihood of occurrences and two species, Osprey (*Pandion haliaetus*) and the Caspian tern (*Hydropronge caspia*), recorded during ecological surveys (refer **Attachment F**).

Based on these investigations, the Proposed Action has the potential to directly and indirectly affect the following migratory species through the permanent removal of habitat and temporary construction-related disturbance.

Osprey

The Proposed Action will permanently remove approximately 0.10 ha of high-value habitat comprising marsh (0.05 ha) and mudflat (0.05 ha), together with approximately 7.53 ha of moderate-value habitat comprising native woodland (4.55 ha), riparian woodland (1.09 ha) and scattered trees and shrubs (1.89 ha) (**Attachment A, Figure 15**).

These habitats provide varying ecological functions for Osprey, including foraging, perching, roosting and potential nesting opportunities. Ecological surveys recorded several Osprey displaying prey-searching behaviour over the Project Area and identified an active nest immediately adjacent to the north-eastern Project Area boundary (outside the disturbance footprint), indicating that the surrounding foreshore environment is utilised by the species (**Attachment B**). Consequently, the Proposed Action has the potential to directly impact habitat used by Osprey and indirectly affect the species through temporary construction activities, including noise, dust, lighting, increased human activity and machinery operating adjacent to utilised habitat.

Pacific Swift and Glossy Ibis

The Proposed Action has the potential to directly impact approximately 0.05 ha of mudflat habitat that may provide opportunistic foraging habitat for Glossy Ibis (**Attachment A, Figure 18**). Pacific Swift is a highly mobile aerial species and is unlikely to rely on terrestrial habitats within the Project Area; however, construction activities may temporarily disturb individuals flying over the Project Area.

Neither species was recorded during ecological surveys, and both were assessed as having a 'possible' likelihood of occurrence (**Attachment F**). Potential impacts are therefore limited to the permanent loss of a very small area of potential foraging habitat for Glossy Ibis and temporary disturbance associated with construction activities.

Migratory shorebird and tern species

The Proposed Action will permanently remove approximately 0.10 ha of suitable foraging habitat comprising 0.05 ha of marsh habitat in 'good' condition and 0.05 ha of mudflat habitat in 'completely degraded condition' (**Attachment A, Figure 17**), that may be utilised by the following migratory shorebird species:

- Common sandpiper (*Actitis hypoleucos*)
- Sanderling (*Calidris alba*)
- Broad-billed Sandpiper (*Calidris falcinellus)*
- Long-toed Stint (*Calidris subminuta*)
- Pectoral sandpiper (*Calidris melanotos*)
- Red-necked stint (*Calidris ruficollis*)
- Little ringed plover (*Charadrius dubius*)
- Bar-tailed Godwit (*Limosa lapponica*)
- Whimbrel (*Numenius phaeopus*)
- Pacific Golden Plover (*Pluvialis fulva*)
- Wood sandpiper (*Tringa glareola)*

- Grey tailed tattler (*Tringa brevipes*)
- Marsh Sandpiper (*Tringa stagnatilis*)

The same marsh and mudflat habitats may also be utilised by the following migratory tern species, which were assessed alongside shorebirds because they use the same habitat values for foraging and roosting:

- White-winged black tern (*Chlidonias leucopterus*)
- Gull-billed tern (*Gelochelidon nilotica*)
- Capsian tern (*Hydroprogne caspia*)
- Common tern (*Sterna Hirundo*)
- Crested tern (*Thalasseus bergii*)

One Caspian Tern was recorded flying over the Project Area during the targeted shorebird survey, while no other migratory shorebird or tern species were recorded during ecological surveys (**Attachment B and C - REDACTED**). The remaining species were assessed as having a 'possible' likelihood of occurrence (**Attachment F**).

Potential direct impacts comprise the permanent removal of approximately 0.10 ha of suitable foraging habitat. Potential indirect impacts include temporary disturbance during construction from vegetation clearing, machinery movement, noise, vibration, lighting, dust and increased human activity, which may temporarily reduce the use of nearby habitat by migratory birds.

Further assessment of the potential impacts to listed migratory species, including consideration of the Significant Impact Guidelines 1.1 and relevant species information, is provided in **Attachment H, Section 4**.

4.1.5.4 Do you consider this likely direct and/or indirect impact to be a Significant Impact? *

No

4.1.5.6 Describe why you do not consider this to be a Significant Impact. *

The Proposed Action is not considered likely to result in a significant impact on any EPBC Act-listed migratory species.

Comprehensive desktop assessments, targeted ecological surveys and likelihood of occurrence assessments were undertaken in accordance with relevant guidance and survey methodologies (refer **Attachment B, Attachment C - REDACTED, Attachment D** and **Attachment F**). The assessment identified the potential for impacts to Osprey, Pacific Swift, Glossy Ibis, 13 migratory shorebird species and five migratory tern species that utilise the same marsh and mudflat habitats.

The likely impacts comprise the permanent removal of approximately 0.1 ha of marsh and mudflat habitat that may provide opportunistic foraging habitat for migratory shorebirds and terns (**Attachment A, Figure 17**), approximately 0.05 ha of mudflat habitat that may provide opportunistic foraging habitat for Glossy Ibis (**Attachment A, Figure 18**), approximately 0.1 ha of high-value Osprey habitat associated with marsh and mudflat, and 7.53 ha of moderate-value woodland habitat that provides potential perching or roosting opportunities for Osprey (**Attachment A, Figure 15**). The Proposed Action will also result in temporary indirect construction related impacts, including noise, dust, vibration, increased human activity and the potential introduction of weeds or pests. These impacts are confined to the construction phase and are not expected to extend beyond the immediate disturbance footprint.

The significance of these impacts has been assessed with reference to the Significant Impact Guidelines 1.1 (DotE 2013), the EPBC Act Policy Statement 3.21: Industry Guidelines for Avoiding, Assessing and Mitigating Impacts on EPBC Act Listed Migratory Shorebird Species (DCCEEW 2017), relevant conservation advice and recovery planning documents, including the Wildlife Conservation Plan for Migratory Shorebirds (DoE 2015) and the Osprey Recovery and Conservation Plan (Australian Government 2020). A detailed assessment of each relevant significant impact criterion is provided in **Attachment H, Section 4**.

The assessment concluded that the Project Area does not contain important habitat for listed migratory shorebirds under the Shorebird Guidelines, as there is no evidence that it regularly supports 0.1% of the flyway population of any species, 2,000 migratory shorebirds or 15 migratory shorebird species. Similarly, the habitat affected by the Proposed Action is not considered important habitat for migratory terns, Pacific Swift or Glossy Ibis under the Significant Impact Guidelines. While Osprey and Caspian Tern were recorded utilising and/or flying over the Project Area, the habitat proposed to be impacted represents only a small component of the broader foraging and breeding habitat available throughout the Serpentine River and Peel-Harvey Estuary, with the active Osprey nest located outside the Project Area.

The ecological surveys did not record Pacific Swift, Glossy Ibis or any other migratory shorebird or tern species within the Project Area, with these species assessed as having only a ‘possible’ likelihood of occurrence and expected to utilise the site opportunistically, if at all. The nature of the impacts is therefore limited to the removal of a small area of habitat that forms part of a much larger and well-connected regional habitat network. The impacts are localised, permanent only within the disturbance footprint, and are not of a magnitude expected to adversely affect an ecologically significant proportion of any migratory species population, substantially modify or isolate important habitat, seriously disrupt breeding, feeding, migration or resting behaviour, or otherwise meet the threshold for a significant impact under the EPBC Act.

The Proposed Action has avoided most ecologically significant habitats within the Project Area. The highest quality marsh (1.07 ha), mudflat (1.34 ha) and riparian woodland (1.24 ha), which provide the greatest ecological value for migratory species, will be retained and permanently protected within ROS, which forms part of the Avoidance area. As a result, the habitat proposed to be removed represents a relatively small and lower quality component of the available habitat resource.

Having regard to the relevant guidelines, species recovery plans and conservation advice, and the detailed significance assessment provided in **Attachment H, Section 4**, the Proposed Action is unlikely to result in a significant impact on any listed migratory species and is therefore not considered to be a controlled action in relation to this matter of national environmental significance.

4.1.5.7 Do you think your proposed action is a controlled action? *

No

4.1.5.9 Please elaborate why you do not think your proposed action is a controlled action. *

The Proposed Action is not considered to be a controlled action as it is unlikely to have a significant impact on any EPBC Act listed migratory species.

The potential impacts comprise the permanent removal of a small area of habitat, including approximately 0.1 ha of marsh and mudflat habitat that may be opportunistically utilised by listed migratory shorebirds and terns, approximately 0.1 ha of high-value Osprey habitat, 7.53 ha of moderate-value Osprey habitat, and 0.05 ha of mudflat habitat that may be utilised by Glossy Ibis (**Attachment A, Figure 15, 17** and **18**). Pacific Swift may occasionally forage over the Project Area; however, the species is not dependent on terrestrial habitats within the Project Area for breeding, roosting or regular foraging.

The significance of these impacts has been assessed with reference to the Significant Impact Guidelines 1.1 (DotE 2013), the EPBC Act Policy Statement 3.21 (DCCEEW 2017), relevant species information, and applicable recovery plans and conservation advice. A detailed assessment of the Proposed Action against each relevant significant impact criterion is provided in **Attachment H, Section 4**.

The assessment concluded that the Project Area does not contain important habitat for listed migratory shorebirds under the Shorebird Guidelines, nor important habitat for migratory tern species, Pacific Swift or Glossy Ibis under the Significant Impact Guidelines. While Osprey and Caspian Tern were recorded within and adjacent to the Project Area, the Proposed Action has been designed to retain the highest quality marsh, mudflat and riparian habitats within the ROS, which forms part of the Avoidance area. These retained habitats comprise the majority of suitable habitat and remain connected to the extensive habitats of the Serpentine River, Peel-Harvey Estuary and Peel-Yalgorup System.

The nature and scale of the impacts are localised and limited to the permanent removal of a small proportion of available habitat. Ecological surveys did not record Pacific Swift, Glossy Ibis or migratory shorebird species within the Project Area (with the exception of a single Caspian Tern flying over the Project Area), and the remaining migratory species were assessed as having only a ‘possible’ likelihood of occurrence, indicating that any use of the Project Area would be occasional, opportunistic and in conjunction with surrounding habitat.

Accordingly, the Proposed Action is unlikely to substantially modify or isolate important habitat, seriously disrupt the lifecycle of an ecologically significant proportion of any migratory species population, result in harmful invasive species becoming established within important habitat, or otherwise meet the threshold for a significant impact under the EPBC Act. On this basis, and having regard to the detailed assessment provided in **Attachment H, Section 4**, the Proposed Action is unlikely to have a significant impact on any listed migratory species and is therefore not considered to be a controlled action.

4.1.5.10 Please describe any avoidance or mitigation measures proposed for this action and attach any supporting documentation for these avoidance and mitigation measures. *

Avoidance

The primary avoidance of environmental values associated with the Proposed Action has occurred through strategic land use planning processes, rather than through subdivision design. The Project Area is zoned 'Urban' and 'ROS' under the PRS and 'Urban Development' and 'ROS' under the CoM LPS 12. The boundaries between land identified for urban development and adjoining ROS were established through these statutory planning processes, which considered environmental values and were referred to the Environmental Protection Authority (EPA) during their preparation. The EPA did not require formal assessment of the planning proposals, thereby allowing the planning framework to proceed with the current urban and conservation boundaries.

Consistent with the PRS and LPS 12, the Proposed Action confines development to land identified for urban development and excludes land reserved as ROS. The proponent has not determined these strategic avoidance boundaries but has designed the subdivision within the established planning framework.

Beyond this strategic avoidance, the Proposed Action incorporates additional avoidance within the urban zoned land, providing a total of 4.26 ha Avoidance area, comprising both the ROS and local open space.

The Avoidance area retains the majority of the highest quality fauna habitat within the Project Area, including:

- 2.41 ha (96%) of high-value Osprey habitat, comprising the most intact mudflat and marsh habitat adjacent to the Serpentine River, including habitat adjoining the active Osprey nest located immediately outside the north-eastern Project Area boundary.
- 1.34 ha (96.4%) of suitable foraging habitat for the Glossy Ibis listed migratory fauna species.
- 2.41 ha (96%) of suitable foraging habitat for the 18 listed migratory shorebird and tern species.

The retained habitats are generally larger, more contiguous and in better condition than the small areas proposed for removal, and will remain connected to the extensive coastal, estuarine and wetland habitats of the Peel-Harvey Estuary and Peel-Yalgorup System. Additional opportunities to retain vegetation and habitat will also be considered during detailed landscape design.

Mitigation measures

In additional to the described avoidance area, the Proposed Action incorporates a 5.36 ha foreshore area adjacent to the Serpentine River that establishes a setback between the development footprint and the Peel-Harvey Estuary (see **Attachment A**, **Figure 4**). The foreshore area comprises the 4.26 ha Avoidance area and a 0.61 ha interface area, the extent of which was determined through a biophysical assessment documented in the FWMP (Emerge Associates 2026). The FWMP has been prepared to guide the long-term protection and management of the foreshore's environmental and cultural values while accommodating passive recreational use.

Potential impacts to migratory species will be further avoided and mitigated through implementation of the EAMP, CEMP, FMP and SWMR, together with standard construction environmental management measures, including but not limited to:

- Demarcation and fencing of retained vegetation and no-go areas prior to construction.
- Mandatory environmental inductions and pre-start briefings for construction personnel.
- Pre-clearing fauna inspections and supervision by suitably qualified fauna spotters during vegetation clearing.
- Directional clearing to encourage fauna dispersal and minimise fauna mortality.
- Construction vehicle speed limits within the Project Area.
- Dust suppression using water carts and ground stabilisation measures.
- Sediment and erosion controls, including perimeter silt fencing and stabilised construction access points.

- Hygiene protocols, including use of clean machinery and certified imported fill, to prevent the introduction and spread of weeds and plant pathogens.
- Weed monitoring and management, including ongoing control of declared weeds and pest species.
- Secure waste management to prevent litter entering adjacent waterways.
- Water sensitive urban design measures, including BRAs, vegetated swales, gross pollutant traps, FSAs and at-source infiltration systems, to maintain pre-development hydrology, protect water quality and minimise offsite discharge.
- Long-term monitoring and maintenance of drainage infrastructure to ensure continued hydrological performance.

Collectively, these avoidance and mitigation measures ensure that direct impacts are confined to the approved disturbance footprint, while minimising the potential for indirect impacts to retained habitats, the Peel-Harvey Estuary, the Peel-Yalgorup System, and associated migratory species.

4.1.5.11 Please describe any proposed offsets and attach any supporting documentation relevant to these measures. *

The Proposed Action is not considered to pose significant residual impacts and there is unlikely to be a significant adverse impact on the relevant EPBC Act list migratory species. The implementation of the mitigation measures removes the need for any offset requirements given the residual impact is not significant. Therefore, the need for offsets have not been considered further.

4.1.6 Nuclear

4.1.6.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.6.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as there are no nuclear action associated with the Project Area or the Proposed Action.

4.1.7 Commonwealth Marine Area

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

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4.1.7.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.7.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as there are no Commonwealth Marine Areas associated with the Project Area or the Proposed Action.

4.1.8 Great Barrier Reef

4.1.8.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.8.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as the Project Area does not occur in proximity to the Great Barrier Reef.

4.1.9 Water resource in relation to large coal mining development or coal seam gas

4.1.9.1 Is the proposed action likely to have any direct and/or indirect impact on this protected matter? *

No

4.1.9.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as the Proposed Action is not associated with a water resource in relation to coal mining or coal seam gas project.

4.1.10 Commonwealth Land

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.10.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.10.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as the Proposed Action is not associated with any Commonwealth lands.

4.1.11 Commonwealth Heritage Places Overseas

You have identified your proposed action will likely directly and/or indirectly impact the following protected matters.

A direct impact is a direct consequence of an action taken – for example, clearing of habitat for a threatened species or permanent shading on an ecological community as the result of installing solar panels.

An indirect impact is an 'indirect consequence' such as a downstream impact or a facilitated third-party action.

—

4.1.11.1 Is the proposed action likely to have any direct and/or indirect impact on any of these protected matters? *

No

4.1.11.3 Briefly describe why your action is unlikely to have a direct and/or indirect impact. *

This is not an applicable MNES as there are no Commonwealth Heritage places overseas that are associated with the Project Area.

4.1.12 Commonwealth or Commonwealth Agency

4.1.12.1 Is the proposed action to be taken by the Commonwealth or a Commonwealth Agency? *

No

4.2 Impact summary

Conclusion on the likelihood of significant impacts

You have indicated that the proposed action will likely have a significant impact on the following Matters of National Environmental Significance:

None

Conclusion on the likelihood of unlikely significant impacts

You have indicated that the proposed action will unlikely have a significant impact on the following Matters of National Environmental Significance:

- World Heritage (S12)
- National Heritage (S15B)
- Ramsar Wetland (S16)
- Threatened Species and Ecological Communities (S18)
- Migratory Species (S20)
- Nuclear (S21)
- Commonwealth Marine Area (S23)
- Great Barrier Reef (S24B)
- Water resource in relation to large coal mining development or coal seam gas (S24D)
- Commonwealth Land (S26)
- Commonwealth Heritage Places Overseas (S27B)
- Commonwealth or Commonwealth Agency (S28)

4.3 Alternatives

4.3.1 Do you have any possible alternatives for your proposed action to be considered as part of your referral? *

No

4.3.8 Describe why alternatives for your proposed action were not possible. *

As discussed in **Section 4.1.4.10**, the Proposed Action is a result of historic planning associated with the PRS.

Under the LPS 12 the majority of the Project Area is zoned ‘Urban’ and the northern portion (foreshore area) is reserved ‘Regional open space’, which is zoned appropriately with the rest of the already developed surroundings (Urban development, Neighbourhood centre, Private community purposes, Rural, Residential, POS, ROS, etc.), particularly with the residential dwellings and developed land immediately adjacent east and west of the Project Area.

Additionally, the Project Area represents some of the last available, fully serviced and appropriately zoned land for urban development within immediate local area, with areas directly abutting the Project Area in the east and west already substantially developed and used for residential purposes. In consultation with the DPLH, it was decided that the project be expedited through the planning process to prioritise the delivery of housing for the region.

Further alternatives to the Proposed Action are not considered necessary given the historical planning process, given the already developed and urban surrounding area, the provisioning of the foreshore area to avoid the removal of key environmental values, and given the Proposed Action is not likely to significantly impact MNES.

5. Lodgement

5.1 Attachments

1.2.1 Overview of the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	08/06/2026	No	High
#2.	Document	Attachment B - Fauna and BC Assessment.pdf Fauna and black cockatoo assessment	13/07/2026	No	High
#3.	Document	Attachment C - REDACTED.pdf Technical memorandum - Migratory Shorebirds (Redacted)	14/07/2026	No	High
#4.	Document	Attachment C - Shorebird Survey.pdf Technical memorandum - Migratory Shorebirds	14/07/2026	Yes	High
#5.	Document	Attachment D - Flora and Veg assessment.pdf Flora and vegetation assessment	01/05/2026	No	High

1.2.6 Commonwealth or state legislation, planning frameworks or policy documents that are relevant to the proposed action

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	City of Mandurah Local Planning Strategy https://www.mandurah.wa.gov.au/business-developm..	01/01/2022		High
#2.	Link	Conservation Advice for Subtropical and Temperate Coastal Saltmarsh https://www.environment.gov.au/biodiversity/thre..	01/01/2013		High
#3.	Link	EcologicalCharacter Description of the Peel-Yalgorup Ramsar Site https://www.google.com/url?sa=t&rct=j&q=&esrc=s&..	01/01/2007		High
#4.	Link	EPBC Act Policy Statement 3.21—Industry guidelines for avoiding, assessing and mitigating impacts on https://www.agriculture.gov.au/sites/default/fil..	01/01/2017		High
#5.	Link	Local Planning Scheme No.12 https://www.mandurah.wa.gov.au/community/service..	01/01/2022		High

#6.	Link	Matters of National Environmental Significance: Significant Impact Guidelines 1.1 https://www.environment.gov.au/system/files/reso..	01/01/2013	High
#7.	Link	State Planning Policy 2.9: Water https://www.planning.wa.gov.au/state-planning-po..	01/01/2025	High
#8.	Link	The referral guidelines for 3 WA Threatened Black Cockatoo species https://www.dcceew.gov.au/sites/default/files/do..	01/01/2022	High

3.1.1 Current condition of the project area's environment

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment E - Historical Aerial Imagery.pdf Historical aerial imagery of the Project Area	01/01/2026	No	High
#3.	Link	Landgate Map Viewer Plus https://map-viewer-plus.app.landgate.wa.gov.au/i..			High

3.1.2 Existing or proposed uses for the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High

3.1.3 Natural features, important or unique values that applies to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Geomorphic Wetlands, Swan Coastal Plain (DBCA-019) https://catalogue.data.wa.gov.au/dataset/geomorp..			High

3.2.1 Flora and fauna within the affected area

	Type	Name	Date	Sensitivity	Confidence

#1.	Document	Attachment C - REDACTED.pdf Technical memorandum - Migratory Shorebirds (Redacted)	13/07/2026		High
#2.	Document	Attachment C - Shorebird Survey.pdf Technical memorandum - Migratory Shorebirds	13/07/2026	Yes	High
#3.	Document	Attachment F - LoO.pdf Likelihood of occurence of ecological communities and flora and fauna within the Project Area.	07/07/2026	No	High
#4.	Link	Basic Fauna and Targeted Black Cockatoo Assessment 28 Placid Waters Parade, Coodanup https://Not publicly available (N/A)	01/07/2026		High
#5.	Link	Detailed Flora and Vegetation Assessment - 28 Placid Waters Parade, Coodanup https://Not published publicly (N/A)	01/05/2024		High
#6.	Link	Targeted Shorebird Survey - 28 Placid Waters Parade, Coodanup https://Not publicly available (N/A)	14/07/2026		High
#7.	Link	Technical Guidance – Flora and Vegetation Surveys for Environmental Impact Assessment http://www.epa.wa.gov.au/policies-guidance/techn..	01/01/2016		High

3.2.2 Vegetation within the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Statewide Vegetation Statistics incorporating the CAR Reserve Analysis (Full Report). Current as of https://catalogue.data.wa.gov.au/dataset/dbca-st..	01/01/2018		High
#2.	Link	Vegetation Complexes - Swan Coastal Plain (DBCA-046)			High

https://catalogue.data.wa.gov.au/dataset/vegetat..

3.3.2 Indigenous heritage values that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Aboriginal Cultural Heritage Inquiry System https://espatial.dplh.wa.gov.au/ACHIS/index.html..			High
#2.	Link	Pindjarup (WA) https://www.samuseum.sa.gov.au/collection/archiv..			High
#3.	Link	The AIATSIS Map of Indigenous Australia https://aiatsis.gov.au/explore/map-indigenous-au..			High

3.4.1 Hydrology characteristics that apply to the project area

	Type	Name	Date	Sensitivity	Confidence
#1.	Link	Geomorphic Wetlands, Swan Coastal Plain (DBCA-019) https://catalogue.data.wa.gov.au/dataset/geomorp..			High
#2.	Link	Hydrography, Linear (Hierarchy) (DWER-031) https://catalogue.data.wa.gov.au/dataset/hydrogr..			High
#3.	Link	Report on Geotechnical Investigation - 28 Placid Waters Parade, Coodanup, WA https://Not publicly available (N/A)	04/02/2015		High

4.1.3.3 (Ramsar Wetland) Why your action is unlikely to have a direct and/or indirect impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment G - Subdivision Water Management Report.pdf The Subdivision Water Management Report for the Project Area	01/05/2026	No	High
#3.	Document				

Attachment H - Significance Assessment.pdf The Significance Impact Assessment for the impacts to MNES as a result of the implementation of the Proposed Action.	01/07/2026	No	High

4.1.4.2 (Threatened Species and Ecological Communities) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment B - Fauna and BC Assessment.pdf Fauna and black cockatoo assessment	12/07/2026	No	High
#3.	Document	Attachment C - REDACTED.pdf Technical memorandum - Migratory Shorebirds (Redacted)	13/07/2026		High
#4.	Document	Attachment C - Shorebird Survey.pdf Technical memorandum - Migratory Shorebirds	13/07/2026	Yes	High
#5.	Document	Attachment D - Flora and Veg assessment.pdf Flora and vegetation assessment	30/04/2026	No	High
#6.	Document	Attachment F - LoO.pdf Likelihood of occurence of ecological communities and flora and fauna within the Project Area.	06/07/2026	No	High
#7.	Link	Matters of National Environmental Significance: Significant Impact Guidelines 1.1 https://www.dcceew.gov.au/environment/epbc/publi..	10/10/2021		High

4.1.4.6 (Threatened Species and Ecological Communities) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment H - Significance Assessment.pdf The Significance Impact Assessment for the impacts to MNES as a result of the implementation of the Proposed Action.	30/06/2026	No	High
#3.	Link				

Matters of National Environmental Significance: Significant Impact Guidelines 1.1 https://www.dcceew.gov.au/environment/epbc/publi..	10/10/2021	High

4.1.4.9 (Threatened Species and Ecological Communities) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment H - Significance Assessment.pdf The Significance Impact Assessment for the impacts to MNES as a result of the implementation of the Proposed Action.	30/06/2026	No	High

4.1.4.10 (Threatened Species and Ecological Communities) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High

4.1.5.2 (Migratory Species) Why your action has a direct and/or indirect impact on the identified protected matters

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment B - Fauna and BC Assessment.pdf Fauna and black cockatoo assessment	12/07/2026	No	High
#3.	Document	Attachment C - REDACTED.pdf Technical memorandum - Migratory Shorebirds (Redacted)	13/07/2026		High
#4.	Document	Attachment C - Shorebird Survey.pdf Technical memorandum - Migratory Shorebirds	13/07/2026	Yes	High
#5.	Document	Attachment D - Flora and Veg assessment.pdf Flora and vegetation assessment	30/04/2026	No	High
#6.	Document	Attachment H - Significance Assessment.pdf The Significance Impact Assessment for the impacts to MNES as a result of the implementation of the Proposed Action.	30/06/2026	No	High

4.1.5.6 (Migratory Species) Why you do not consider the direct and/or indirect impact to be a Significant Impact

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment B - Fauna and BC Assessment.pdf Fauna and black cockatoo assessment	12/07/2026	No	High
#3.	Document	Attachment C - REDACTED.pdf Technical memorandum - Migratory Shorebirds (Redacted)	13/07/2026		High
#4.	Document	Attachment C - Shorebird Survey.pdf Technical memorandum - Migratory Shorebirds	13/07/2026	Yes	High
#5.	Document	Attachment D - Flora and Veg assessment.pdf Flora and vegetation assessment	30/04/2026	No	High
#6.	Document	Attachment F - LoO.pdf Likelihood of occurence of ecological communities and flora and fauna within the Project Area.	06/07/2026	No	High

4.1.5.9 (Migratory Species) Why you do not think your proposed action is a controlled action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High
#2.	Document	Attachment H - Significance Assessment.pdf The Significance Impact Assessment for the impacts to MNES as a result of the implementation of the Proposed Action.	30/06/2026	No	High

4.1.5.10 (Migratory Species) Avoidance or mitigation measures proposed for this action

	Type	Name	Date	Sensitivity	Confidence
#1.	Document	Attachment A - Figures.pdf Figure-set accompanying the referral	07/06/2026	No	High

5.2 Declarations

Completed Referring party's declaration

The Referring party is the person preparing the information in this referral.

ABN/ACN	57144772510
Organisation name	Emerge Environmental Services Pty Ltd
Organisation address	26 Railway Road, Subiaco, 6008 WA
Representative's name	Jason Hick
Representative's job title	Director, Principal Environmental Consultant
Phone	08 9380 4988
Email	jason.hick@emergeassociates.com.au
Address	Suite 4, 26 Railway Road, Subiaco WA 6008

☑ Check this box to indicate you have read the referral form. *

☑ Check this box to confirm these are the correct identification details. *

☑ By checking this box, I, **Jason Hick of Emerge Environmental Services Pty Ltd**, declare that to the best of my knowledge the information I have given on, or attached to this EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

Completed Person proposing to take the action's declaration

The Person proposing to take the action is the individual, business, government agency or trustee that will be responsible for the proposed action.

ABN/ACN	19691013297
Organisation name	BMP LAND PROJECTS PTY LTD
Organisation address	Level 2, 428 Little Bourke Street, Melbourne VIC
Representative's name	Mitch Brown

Representative's job title	General Manager WA
Phone	0435 831 285
Email	mitch@wolfdene.com.au
Address	LEVEL 5, 28 THE ESPLANADE, PERTH, WA 6000

☑ Check this box to indicate you have read the referral form. *

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Mitch Brown of BMP LAND PROJECTS PTY LTD**, declare that to the best of my knowledge the information I have given on, or attached to the EPBC Act Referral is complete, current and correct. I understand that giving false or misleading information is a serious offence. I declare that I am not taking the action on behalf or for the benefit of any other person or entity. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.

✔ Completed Proposed designated proponent's declaration

The Proposed designated proponent is the individual or organisation proposed to be responsible for meeting the requirements of the EPBC Act during the assessment process, if the Minister decides that this project is a controlled action.

Same as Person proposing to take the action information.

☑ Check this box to indicate you have read the referral form. *

☑ Check this box to confirm these are the correct identification details. *

☑ I, **Mitch Brown of BMP LAND PROJECTS PTY LTD**, the Proposed designated proponent, consent to the designation of myself as the Proposed designated proponent for the purposes of the action described in this EPBC Act Referral. *

You may receive automated notifications that aim to assist you in tracking the progress of your project. You can opt out of these notifications by updating your communication preferences on your profile.