# AMENDED OFFICERS RECOMMENDATION

## 13.2 LANCELIN SOUTH STRUCTURE PLAN (AMENDMENT 2026)

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| File | LND/0137 |
| Applicant | CLE Town Planning and Design |
| Location | Part Lot 9000 and Lot 9001 Lancelin Road, and Part Lot 1 Old Ledge Point Road, Lancelin |
| Owner | VIMG WA Pty Ltd |
| Zoning | Future Development, Conservation and Landscape Protection (LPS9) |
| Author | Casimir Penheiro – Manager Development Services |
| Reporting Officer | Mark Close - Temporary Executive Manager Regulatory and Development Services |
| Refer | Nil |
| Appendices | {attachment-list} |

### AMENDED OFFICER RECOMMENDATION

That Council:

1. Advise the Western Australian Planning Commission that the Amended Lancelin South Structure Plan (April 2026) prepared by CLE Town Planning + Design on behalf of VIMG WA Pty Ltd is supported subject to the following modifications:

    a. Delete or substantially reconfigure the proposed direct residential and emergency access connection to Indian Ocean Drive, consistent with Main Roads WA's submission;

    b. Increase the area of the four primary school sites to 3.75ha, or enlarge the adjoining shared use public open space, and amend the road hierarchy fronting school sites, consistent with the Department of Education's submission;

    c. Formally reserve both Conservation Areas and require an Environmental Management Plan for these areas to be prepared and approved as part of the Structure Plan, consistent with the Department of Biodiversity, Conservation and Attractions' submission;

    d. Provide an updated current fauna and flora survey addressing Carnaby's Black Cockatoo foraging habitat and the potential threatened ecological community identified by the Department of Biodiversity, Conservation and Attractions;

    e. Specify ecological corridor widths and interface treatments within the linear public open space in the Landscape Master Plan;

f. Update the Bushfire Management Plan to reconcile Asset Protection Zone requirements with vegetation retention within the linear public open space areas;

g. Reconcile the proposed reduction to the Landscape Protection Zone along Indian Ocean Drive with the Visual Impact Report's recommended minimum 50m buffer and Main Roads WA's outstanding queries;

h. Include a Structure Plan wide requirement for a Construction, Dust and Erosion Management Plan addressing the matters, responsive to the Department of Primary Industries and Regional Development's submission;

i. Notate the Structure Plan to identify lots adjoining Lancelin Road subject to "Quiet House Design" acoustic treatment requirements; and

j. Confirm groundwater allocation sufficiency and mosquito management buffer provisions, consistent with submissions by the Department of Education and Department of Health submissions.

2. Note the Schedule of Submissions and Officer Responses.

3. Note that no further broadacre clearing or bulk earthworks will be endorsed by the Shire within the Structure Plan area until a Shire approved 'Construction, Dust and Erosion Management Plan' is in place, having regard to the substantiated dust and sand-drift concerns associated with earlier stages of the site and the extreme wind erosion risk profile of the site's soils.

<u>Reason for Amended Officer Recommendation</u>

The Applicant provided a response to the Schedule of Submissions (now attached) that was misplaced during the preparation of the Schedule.

The Structure Plan will therefore proceed directly to the WAPC, under the amended recommendation, with support, subject to the modifications noted under Part 1 of the officer recommendation.

The applicant and the Shire have liaised extensively on the pertinent issues and the modified recommendation is understood for the purposes of progressing to the WAPC.

## SCHEDULE OF SUBMISSIONS AND RESPONSES

Lancelin South Structure Plan (Amendment April 2026)

The full Schedule of Submissions, including the Applicant's Responses and Officer's Responses, is set out in the table on the following pages.

| No. | Submitter | Submission Details | Applicant's Response | Officer Response |
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| 1 | DoE | The proposed Structure Plan has been assessed against the relevant provisions of the Western Australian Planning Commission's Operational Policy 2.4 – Planning for School Sites (OP 2.4) and Liveable Neighbourhoods (LN). The following matters have been identified and are required to be addressed:<br><br>**Demand of public-school sites**<br>The Department supports the inclusion and spatial distribution of four public primary school sites and one public high school site based on the proposed dwelling yields within the Structure Plan area. However, should there be any increase in the number of dwellings or changes to the density coding or zoning which would result in an increase to the student enrolment demand, and/or the school site is impacted by any physical or environmental constraints which may compromise the developability of the site, the Department reserves the right to review the public school planning at future structure plan amendment or subdivision process and that additional public school infrastructure may be required. | Noted. The matter raised can be monitored as subdivision progresses over the site. | |

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| | | **Size of public primary school sites**<br>The Department requests that the proposed primary school sites are increased from 3.5 hectares (ha) to 3.75 ha to accommodate supplementary services including childcare.<br>As per the OP 2.4, a school site adjacent active Public Open Space (POS) that can accommodate a shared use oval, the primary school site can be reduced to 3.5 ha and the Department requests an additional 0.25 ha to be used to provide childcare services. | Clause 3.7.3 of OP 2.4 does not establish the additional 2,500m² as a standard site requirement. The provision is discretionary and conditional "*where there is an identified need in a community*" and where there is a need, the additional land is to be "*set aside for acquisition*".<br><br>For example, a child care lot of approximately 2,100sqm has been provided within the Stage 9 subdivision area within the 'Stage 1 ODP' to deliver on the need for child care within the estate, as agreed with the Shire of Gingin. The provision of future child care centres should therefore be reviewed on an as required basis as the project progresses based on demonstrated demand and capability of the market to deliver, as per the principles of the policy.<br><br>The capability of private industry to deliver the need for childcare is available as needed, and is standard practice across WA, where childcare serves are delivered by the private sector. There has been no analysis or modelling undertaken by DOE to demonstrate that the market will not be able to meet demand as the estate develops, which is commonplace in greenfield development areas.<br><br>Should a need be identified, these services can be accommodated or in adjoining zones, given that the land use is discretionary in the residential zone. If the Department were to require the 3.5ha school sites to be increased, a further needs assessment be identified by DoE and note that any additional land provided would be subject to acquisition by DoE as outlined in OP 2.4.<br><br>This can be addressed at subdivision stage on an as required basis and therefore is not | |

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| | | | recommended to be included in the structure plan as a requirement given the inconsistency with OP 2.4. | |
| | | **Shared use POS**<br><br>This allowance to reduce a primary school sites area, is on the basis it is co-located with active POS. At a minimum, the shared use POS needs to be able to accommodate a junior oval and all associated community infrastructure and facilities, ensuring a maximum oval encroachment (including the oval over-kick zone) of 0.5 ha into the school footprint. The key function of shared use POS is to provide active POS and are not intended to perform drainage or vegetation conservation functions. The proposed shared use POS (POS 1a, POS 3, POS 15a & POS 25) need to be increased to ensure the area of unrestricted POS can accommodate an oval and ancillary infrastructure. | The shared use POS areas have been sized to be capable of accommodating a junior oval and all necessary community infrastructure without encroaching into the school footprint.<br><br>This is spatially depicted on the concept plan which show that junior ovals can be accommodated entirely within the POS area, refer updated version attached.<br><br>All active POS requirements can be accommodated, including provision of relatively minor small areas of drainage as outlined below:<br>• POS 1a (2.17ha)<br>o 0.2ha of restricted POS<br>• POS 3 (2.03ha)<br>o 0.09ha restricted POS<br>• POS 15a (2ha)<br>o No drainage proposed<br>• POS 25 (2.02ha)<br>o 0.05ha restricted POS<br><br>It is standard practice for drainage infrastructure to be located in shared use POS, noting that the drainage in these areas is relatively minor and will have a negligible impact on the functionality of these POS areas. | |

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| | | **Roads**<br>The road network and number of street frontages around the school sites is generally supported. However, there should be an emphasis on maximising local Access Road frontage to facilitate on-street parking opportunities, and access to on-site parking.<br><br>The northeastern primary school site is surrounded by 3 x Neighbourhood Connectors (with one being a Landscape Boulevard Street). The lack of Access roads is concerning, and this needs to be addressed with appropriate traffic calming and maximising school site access.<br><br>The Department requests that all the lower order roads adjoining all the school site should be designed to the 17.9 m Access Street B standard identified in LN. These requirements are not based on forecast traffic volumes, but on achieving an appropriate outcome for pedestrian movement, school access, on-street parking. | The landscaped boulevard street along the northern boundary of that primary school site is capable of accommodating on-street parking and has been proposed to intentionally maximize pedestrian connections and street tree planting to promote walkability and accessibility within the site<br><br>Whilst the TIA identifies this road as a Neighbourhood Connector, this is a product of its width and function, with volumes more commensurate with an Access Street B (<3000vpd) and not a Neighbourhood Connector.<br><br>The landscaped boulevard streets will provide pedestrian footpaths on both sides, as well as a centralized shared path. Staged crossings with median refuge will be provided to allow pedestrians and cyclists to cross the road safely.<br><br>All other schools are proposed to be bound by local Access Streets as required by OP 2.4. | |
| | | **Vegetation**<br><br>The OP 2.4 seeks to secure school sites which are developable, unencumbered and fit for its purpose. School sites should not feature any native vegetation, threatened fauna habitat, or need any State or Australian Government environmental approvals or offsets, or require significant areas of vegetation to be retained | Noted. | |
| | | **Groundwater allocation**<br><br>The Structure Plan Report does not include any commentary on whether there is sufficient groundwater allocation across the Structure Plan area. It is critical that adequate groundwater allocation is available to meet the future irrigation demands of the public primary school sites and | The site has 350,625 kL/yr groundwater license which aligns with the longer-term irrigation requirements for the site, including for all POS Irrigation and school ovals.<br><br>In time the allocation required to irrigate the school ovals would be transferred to DoE once the schools are established. | |

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| | | adjoining public open spaces. | | |

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| | | **Recommendation**<br>In view of the above, the Department has no objections to the proposed Structure Plan subject to the above matters being satisfactorily addressed. The Department welcomes the opportunity to liaise with the Shire of Gingin, Department of Planning, Lands and Heritage and/or developer to ensure compliance with the provisions of the OP 2.4. | Noted and the proponent will continue to liaise with the DoE as subdivision progresses over the balance of the site. | |
| **2** | **DoH (No objection – with comment)** | **1. Water supply and wastewater disposal**<br>Drinking water and sewage services must be provided by a licensed service provider.<br><br>Any non-drinking water (i.e., water that is not intended or suitable for drinking) must be managed to ensure it cannot be confused with or contaminate the drinking water supply. This requires satisfactory labelling of non-drinking water taps and, depending on system configuration suitable backflow prevention arrangements in accordance with Australian/New Zealand Standards AS3500 – Plumbing and Drainage. | Noted. Water and wastewater services will continue to be managed by the Lancelin South Water Pty Ltd, a licensed water utility. | |
| | | **2. Medical Entomology – Mosquito Management** The subject land is in a region that occasionally experiences problems with nuisance and disease carrying mosquitoes. These mosquitoes are known carriers of Ross River (RRV) and Barmah Forest (BFV) viruses. | There are no open water bodies on the site except for excavated dam near DeBurgh's Well. The management of this open water body will be ascertained at subdivision. The construction of additional open water bodies is highly unlikely which will be confirmed at | |

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| | | Human cases of RRV and BFV diseases occur in some years in this general locality.<br><br>To ensure the suitability of the land for development, all land use planning decisions should take into account the possible risk to human health and safety in relation to nuisance mosquitoes and mosquito-borne disease. Consideration must be given to proximity of mosquito breeding habitats and whether mosquito management, if required, will be effective, appropriately resourced; and be approved by the relevant environmental agencies.<br><br>Mosquito breeding sites may be either natural wetlands or constructed water bodies. For this reason, careful planning and consideration must be given to the design and location of 'liveable communities' and social infrastructure, such that there are buffer zones between water bodies and developments that reflect mosquito dispersal distances. | subdivision.<br><br>Any drainage infrastructure as per the future UWMPs will ensure that all stormwater will be infiltrated within 3.5 days for the 1% AEP in accordance with the *Stormwater Management Manual for Western Australia* Chapter 9 *Structural Controls* (DWER 2022). | |

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| 3 | DPIRD | The development is technically achievable but is highly sensitive to poor implementation.<br><br>**Native vegetation**<br>Given the substantial area of native vegetation that will be cleared, DPIRD recommends that the proponents liaise closely with the Department of Water and Environmental Regulation and the Department of Biodiversity, Conservation and Attractions. Habitat loss and fragmentation will occur, along with edge effects (weed invasion, more clearing for fire management, and human recreation) and local biodiversity decline. | In accordance with clause 4.8.8.2 and Environmental Condition 2, Schedule 7 of the LPS 9, an Environmental Management Plan (EMP) will be prepared and implemented as a condition of subdivision for land adjacent to the 'Conservation' zoned land where native vegetation is proposed to be retained.<br><br>The EMP will be prepared in consultation with DWER and DBCA to minimize habitat loss and making provision for weed control, fire response and suppression, revegetation, and design and maintenance of pathways and public viewing areas.<br><br>This is enforced via Part 1 of the amended LSP which requires the preparation and implementation of an EMP as a condition of subdivision approval. | |

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| | | **Erosion risks**<br>The clearing will also reduce the protection of the sand dunes, which will increase the wind and water erosion risk. However, the establishment | Noted. The LSP has been designed to ensure the protection and retention of dunal forms within POS, the Conservation zone and/or the Landscape Protection zone. Consideration of engineering design levels to minimize substantial level differences at interface locations will be addressed at subsequent stages of planning.<br><br>The development is approximately 650m – 800m from the coast, and SPP 2.6 coastal planning is therefore not relevant to this site. | |

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| | | of the infrastructure on the land may assist to mitigate the erosion. The development is also around 0.5-1km from the beach, which gives a small buffer from coastal erosion.<br><br>There are media reports that indicate that Lancelin has experienced significant coastal erosion. One beach at Lancelin reportedly saw erosion of about 6 metres from a storm in early June 2026, and over the past 15 months, approximately 50 metres of Lancelin's northern beach has disappeared. | | |
| | | **Groundwater**<br><br>The highly permeable sandy soils carry a risk of groundwater contamination, as pollutants (eg: nutrients, hydrocarbons) will rapidly infiltrate and affect the aquifer. Mitigation exists via biofiltration, but the residual risk remains high, particularly if poorly maintained. | The export of nutrients and other pollutants into groundwater will be managed in terms of waste water disposal and stormwater management based on the current Best Management Practices in Water Sensitive Design. The multi-purpose corridors and public open space areas used for stormwater management will incorporate water sensitive design principles, including:<br><br>• Appropriate separation between developments and groundwater to ensure that urban stormwater is not discharged in to the groundwater without first receiving appropriate treatment; | |

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| | | | • Managing surface water quality through a number of non-structural and structural methods using Water Sensitive Urban Design (WSUD) principles<br>• At source treatment and infiltration; and<br>• Use of ecologically sound compensation and infiltration basins designed to remove nutrients. | |
| | | **Practical suggestions**<br><br>Some practical suggestions to reduce risk from the development include:<br><br>• Stage clearing with immediate soil stabilisation (mulch/revegetation)<br>• Retain additional dune crests and vegetation corridors<br>• Implement dust and wind erosion controls during construction<br>• Mandate long-term maintenance of biofiltration systems<br>• Establish erosion monitoring triggers and corrective actions<br><br>*(1) https://www.abc.net.au/news/2026-06-11/rapid-erosion-along-wa-coast-lancelin-emergency-funds/106769464* | The proposed structure plan aligns with the expectations of the underlying planning framework and will be development in accordance with industry standards. Information associated with construction will be provided at relevant stages of the approval process.<br><br>Areas of POS will retain existing landforms and vegetation where possible, however it is noted that the extent of natural landforms to be retained is limited due to the undulating natural topography.<br><br>Some of this information would also be included within the Environmental Management Plan as required at subdivision in accordance with Ministerial Statement 853, for conservation areas. | |
| **4** | **Main Roads** | In response to your correspondence received on 4 June 2026, Main Roads provides the following comments:<br><br>**Section 4.3 Movement Network, Proposed Indian Ocean Drive Access** (approx. slk 66.7) The structure plan proposes an additional local road connection to Indian Ocean Drive. Main Roads does not support additional access along this section of the IOD. No direct vehicle access shall be permitted to or from Indian Ocean Drive in accordance with both WAPC and Main Roads planning guidelines, policies and the endorsed Indian Ocean Drive transport planning (as listed | We acknowledge Main Roads' comments and the strategic importance of appropriately managing access to Indian Ocean Drive. However, at this stage the development team considers that there remains a strong strategic case for retaining the proposed second connection to Indian Ocean Drive from within the Lancelin South Structure Plan, subject to further consultation with Main Roads.<br>In particular:<br>• The proposed road connection is not an individual property driveway or minor development access. It is intended as a strategic road network | |

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| | | in Attachments A and B). Please find the following detail to further understand Main Roads current position in accordance with the Indian Ocean Drive Planning Study:<br><br>**INDIAN OCEAN DRIVE PLANNING STUDY** (D23#431865)<br>• Main Roads have finalised the Indian Ocean Drive Planning Study, developing a safe and consistent future road network that aligns with Safe System principles and manages current and future transport demands along the corridor.<br>• As part of the study, an Access Strategy was developed to manage access to Indian Ocean Drive in a safe and coordinated manner, including identifying appropriate access arrangements and opportunities for shared access where possible.<br>o *Access to a State road may be granted in accordance with a vehicle access strategy if the strategy has been agreed by Main Roads and the relevant Local Government.(Driveway Policy Section 3.1.1)*<br>o *Where alternative access could be made available from side or rear streets or from rights of way, no access shall be permitted to the State road unless special circumstances apply, such as an agreed vehicle access strategy. (Driveway Policy Section 2.4)*<br>• The proposed Access Strategy and key outcomes for the study (i.e duplication of IOD) were publicly advertised and consulted on with key stakeholders, including affected landowners and the Shire of Gingin, to inform the development of the final strategy. | connection serving the ultimate Lancelin South development, comprising approximately 7,000 residential lots together with schools, activity centres, community facilities and employment uses. The connection therefore performs a materially different function to an individual driveway providing direct property access to Indian Ocean Drive.<br><br>• While Main Roads has referred to its Driveways policy, PJA notes that the policy is principally framed around the management of driveway/property access to State roads. The proposed Lancelin South connection is instead a strategic public-road connection forming part of the broader movement network for a substantial future urban area. Nevertheless, the policy itself provides the opportunity for access to a State road where this forms part of an agreed vehicle access strategy between Main Roads and the relevant Local Government, and therefore provides a mechanism through which an appropriate access outcome can be further investigated and agreed. The Main Roads' Driveways policy refers to the WAPC Development Control Policy 5.1 Regional Roads (Vehicular Access), which states: '*The types of development that would be allowed access to a regional road include large traffic generators such as major shopping, recreation or community centres*'. *'These would justify either a local distributor or access road, leading from a junction with the regional road to car parks servicing the centre.'* | |

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| | | • The proposed access at approximately SLK 66.7 was not included in the adopted Access Strategy, as direct access at that location was not considered appropriate having regard to the strategic function and safety objectives of Indian Ocean Drive.<br>• A summary of Indian Ocean Drive has been provided in Appendix C to add further background to the IOD to compliment the information found on the Indian Ocean Drive Planning Study webpage including the Planning Study Fact Sheet dated April 2021. Please note that the Indian Ocean Drive Planning study is a planning study only, the upgrading/widening of Indian Ocean Drive and Lancelin Road Intersection is not in Main Roads current 4-year forward estimated construction program and all projects not listed are subject to change without notice.<br>• Excerpts to note in the IOD Planning Study Access Strategy:<br>*It is recommended that Main Roads continue to consult with landowners and the Shire of Gingin to identify future land development and access requirements along the corridor, and ensure these developments align with the ultimate concept design and access strategy for IOD.* (Page 62)<br>o *Future extension of Old Ledge Point Road to connect Ledge Point Road to Lancelin Road would provide both communities with a second access option in the event of a bushfire emergency.* (Page 62)<br>o *As discussed with individual landowners, should any future development be considered, they are encouraged to* | • This collaborative approach is also consistent with the Indian Ocean Drive Planning Study, which specifically considers future land development, access requirements and intersection treatments along the corridor. Main Roads' published material recognises the need to minimise connection points while still providing appropriate levels of network access.<br>• A second connection to Indian Ocean Drive provides an important traffic distribution and network resilience function, allowing traffic generated by the substantial Lancelin South development to be distributed across the surrounding road network rather than concentrating traffic movements through Lancelin Road and the existing Indian Ocean Drive / Lancelin Road intersection.<br>• Retaining the second road connection to Indian Ocean Drive also provides greater flexibility in the long-term operation and staging of the transport network. Removing the connection does not remove the traffic demand generated by Lancelin South.<br>• The TIA has already deliberately developed the proposed intersection with safety in mind. This includes a reduced speed environment, removal of the demonstrated higher-risk southbound right-turn movement from Indian Ocean Drive into Lancelin South structure plan, appropriate channelisation and turning treatments, and provision for vehicles exiting the development towards the south to undertake the movement in stages and accelerate within an acceleration lane before merging with southbound | |

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| | | | *approach Main Roads to ensure their development plans are compatible with the ultimate road reserve requirements and proposed access strategy.* (Page 80) | traffic.<br>• The intersection location and ultimate design can be subject to further detailed assessment, including confirmation of appropriate intersection geometry, sight distance, speed management, auxiliary lane requirements and compatibility with the ultimate Indian Ocean Drive corridor design.<br><br>On this basis, PJA considers that it would be premature to remove the proposed Indian Ocean Drive connection from the Structure Plan at this stage given there is a technical basis to support the inclusion of the proposed road connection.<br><br>PJA and the development team are committed to working collaboratively with Main Roads, the Shire of Gingin and other relevant agencies to successfully resolve this matter in due course. It is expected that this will include further technical assessment and an in-person meeting with the relevant agencies to discuss the measures necessary to achieve a safe and mutually acceptable outcome. | |

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| | | **Additional Comments Regarding Road Safety and Access**<br><br>• The addition of new access points to high-speed regional roads is generally discouraged, as research in Australia and internationally demonstrates that increasing the number of access connections leads to higher crash rates and increased crash frequency (Austroads Guide to Road Design Part 4).<br>• A US study (US DoT, Technical Summary: Corridor Access Management 2016) indicates that each additional unsignalised access point per mile increases the overall crash rate by 3% and crash frequency by 5%. | As above | | |

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| | | • Consistent with Safe System principles, Austroads recommends limiting the number of access points on roads operating above 60 km/h to reduce conflict points and minimise the likelihood and severity of crashes (Austroads – Safe System in the Planning Process Section 2.4).<br>• Austroads (Austroads GRD4) further recommends that access to high-speed roads be consolidated wherever possible, using existing side roads, service roads or shared access arrangements rather than creating new direct connections (Section 7.2.3).<br>• Vehicles entering or leaving an access point disrupt through traffic and create additional conflict points, with these impacts becoming more critical as traffic speeds and volumes increase (Appendix E – Access Spacing). | | |
| | | **Section 4.3 Movement Network, Lancelin Road Access** (approx. 0.5 SLK)<br>The access onto the Lancelin Road is located at the end of a merge lane required for the upgraded intersection between Lancelin Road and the Indian Ocean Drive. The functional area of the intersection needs to be considered when locating the access on Lancelin Road.<br>With the addition of the traffic from the proposed IOD connection the structure plan indicates Lancelin Road could be carrying in the order of 15,000 vehicles per day (likely to be significantly higher during seasonal peaks). Future upgrades to Lancelin Road shall also need to be considered. | The alignment of the intersection closest to Lancelin Road can be reviewed to avoid conflict with the merge lane as needed. Assume that this will be considered in the schedule of modifications and can be investigated and resolved accordingly in subsequent stages of assessment. | |
| | | **Section 4.3 Movement Network, Intersection of Indian Ocean Drive and Lancelin Road** (approx. 68.25 SLK) | Noted, we have not been provided with a copy of the preliminary design of the roundabout by MRWA, however this is generally consistent | |

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| | | Main Roads have indicated Indian Ocean Drive and Lancelin Road intersection may be upgraded in the future to a 2 lane roundabout. To date there has only been a preliminary concept with little detail to assist determine the scope of work required to progress through the design stages. No funding has yet been committed to progress with the design and is not in Main Roads current 4-year forward estimated construction program, all projects not listed are subject to change without notice. | with the envisaged approach developed under the TIA which modelled a dual lane roundabout. | |
| | | **Section 4.3 Connectivity**<br><br>Main Roads recommends further detail and investigation in the Structure Plan and broader area commenting on the options and potential staging to connect the existing developed areas with Lancelin South facilities including:<br>• Access to/from Seaview Park Estate to address local vehicle trips, pedestrian and cyclist movements expected as a result of commercial and school developments in the structure plan area.<br>• Extension of Old Ledge Point Road to Ledge Point Road (Ledge Point) to provide for anticipated inter-town movements. In addition to connecting Ledge Point residents/visitors with access to additional community facilities in Lancelin South this would provide an alternative access to Indian Ocean Drive for Lancelin South.<br>• Access to Memorial alongside IOD will need to be from local road network ultimately, as soon as possible considering the staging of subdivision progress. | • Seaview – the proposed South Lancelin development does not preclude future pedestrian access from Seaview, but it is not the role of Lancelin South to facilitate this outcome for the established developments. Seaview park is not designed to a pedestrian / cyclist standard, there is poor connectivity east-west and currently and there are no footpaths within the estate. The Shire of Gingin and MRWA could investigate investment in this space in the future if pedestrian access from the estate into Lancelin South was a community priority of Seaview.<br><br>• The connection of Lancelin South to Ledge Point has never been a consideration of previous planning exercises and Indian Ocean Drive is an adequate connector route for Future Residents. If the Shire of Gingin see this | |

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| | | | to be a future priority, they could investigate upgrading the existing road reservation in the future.<br><br>• The intent of the memorial note is unclear, however if this relates to providing any limitation to intersection access from Indian Ocean Drive, this is not supported. | |
| | | **Section 4.10 Bushfire Management Plan**<br><br>Main Roads does not support access to the Indian Ocean Drive for bushfire emergency purposes, in the first instance. Consistent with access management and road safety principles emergency access should be accommodated through the local road network wherever practicable. All alternative options must be thoroughly investigated and demonstrated to be unfeasible to Main Roads satisfaction before emergency access to IOD could be contemplated.<br><br>Although the Structure Plan proposes a local road access, the establishment of an Emergency Access Way (EAW) to IOD has also been considered by Main Roads. Due to limitations on the allowable length and operation of EAWs per State Planning Policy 3.7 Bushfire, it is unlikely that an EAW would provide an acceptable solution for the initial stages of development, and an alternative access arrangement would still need to be identified and delivered.<br><br>In addition, an EAW connecting to a high-speed regional road presents the same road safety risks as any other access point. While the need to use the EAW during a bushfire event may be infrequent, the presence of the access connection creates an ongoing safety risk through the introduction of an additional conflict point on the regional road network.<br><br>By virtue of their emergency function, EAWs must remain available for public use during an emergency and therefore cannot be permanently | Section 4.10 of the BMP - at this stage, emergency egress for emergency purposes is not proposed. While the Guidelines indicate that there needs to be at least two egress options available, these will be via the planned/intended road network, rather than being an EAW as defined in the Guidelines.<br><br>The intersection at Indian Ocean Drive is proposed as a standard intersection, not an emergency access.<br><br>Note that most subdivisions I am involved with, very few have a designated emergency access that is for that purpose alone. It is presumed that any access to IOD or Lancelin Rd will be suited to the expected usage by the local residents. Based on the size of the subdivision, there are also likely to be places, like reserves and ovals, that would provide a safe, suitable place for residents to travel to. As no EAW is proposed, the issues will security and the prevention of unauthorised access will not be an issue. | |

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| | | secured in a manner that reliably prevents unauthorised access. Unauthorised vehicle access would create an ongoing road safety and compliance issue for Main Roads. Furthermore, EAWs can attract illegal dumping, trespassing | | |
| | | , vandalism and other antisocial activities, resulting in ongoing maintenance and land management issues that would typically fall to the relevant local government authority.<br><br>Accordingly, Main Roads' preference remains that bushfire access and egress requirements be addressed through a suitably connected local road network rather than by creating any additional access to Indian Ocean Drive. | | |

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| | | **Section 3.2, 4.4, 4.11, 4.12 Landscape Protection Zone Abutting Indian Ocean Drive**<br>The structure plan proposes a reduction in width to the landscape protection zone (Section 3.2 and 4.4). Main Roads has no objection provided visual screening and there is sufficient detail and space for any noise reduction (section 4.11) methods supported by the Shire of Gingin.<br><br>Main Roads would like to review further detail of the extent of fill and levels proposed to fill the hollows (section 4.4 and 4.12) in combination with proposed reduction in width to the landscape zone to determine if there are any impacts to the future widening of the Indian Ocean Drive, considering:<br><br>• It is not known at this stage the design / final levels of the IOD between Lancelin Road and KW Road<br>• Final design and construction of IOD between Lancelin Road and KW road may require further noise mitigation in the area considering a reduction in the landscape protection zone ie. Walls<br>• Water Tank Site is proposed within the reduced landscape protection zone. | The structure plan does not propose a reduction to the landscape protection zone under LPS 9, it provides a landscaped response within the landscape protection zone consistent with the intent and land use permissibility that is facilitated through LPS 9.<br><br>Support is noted.<br><br>The proposed fill in the Landscape Protection zone doesn't preclude the future construction of IOD, with further detail on the exact location and extent of fill required to be confirmed as part of detailed engineering designs. All fill will be located within the private landholding.<br><br>Any future noise impacts can be managed through applicable house design packages which will be confirmed as subdivision progresses for the site.<br><br>Any future modification to the road network that may result in impacts to adjoining landowners following development will be the responsibility to MRWA. | |

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| | | Main Roads welcome further discussion with WAPC with regard to Main Roads position and advice provided above.<br><br>Main Roads encourage applicants to meet with Main Roads to discuss access arrangements to the state primary road network prior to lodgment of planning proposals, especially where development plans involve land adjacent to or have the potential to impact on the State road network.<br><br>Main Roads requests a copy of the Commission's final determination to be sent to mwgplanning@mainroads.wa.gov.au quoting the file reference above.<br><br>**Attachments (Found at the end of this document)**<br><br>*Attachment A: Planning Guidelines and Policy, and Indian Ocean Drive Planning*<br>*Attachment B: Mechanisms to protect the road network from unapproved access*<br>*Attachment C: 2026 Main Roads Response Email Following Recent Meeting (D26#758240)*<br>*Attachment D: 2016 Main Roads Response to Structure Plan (D16#564340)*<br>*Attachment E: Indian Ocean Drive Summary*<br>*Attachment F: Aglime Routes Plan* | A meeting will be sought with MRWA, DPLH and Shire of Gingin, and we propose to resolve the IOD access matter concurrently with the WAPC assessment of the structure plan. | |
| **5** | **DBCA** | The Department of Biodiversity, Conservation and Attractions (DBCA) has reviewed the proposal pursuant to DBCA's responsibilities under the *Biodiversity Conservation Act 2016* (BC Act) and the *Conservation and Land Management Act 1984.* DBCA has previously provided advice to the Shire of Gingin regarding the Lancelin South Structure Plan, Lancelin South Outline Development Plan, and the Stage 2 Lancelin South Structure Plan. The advice provided below is consistent | Noted | |

| No. | Submitter | Submission Details | Applicant's Response | Officer Response |
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| | | with DBCA's previous comments.<br><br>**Fauna**<br>DBCA is aware that Carnaby's black cockatoos (*Zanda latirostris)* were recorded on site during a fauna survey by Ecoscape in 2008, and that the subject area contains foraging habitat for black cockatoos. Black cockatoos are listed as threatened species under the State BC Act and Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It is unclear whether recent comprehensive fauna surveys have been taken across the entire extent of the structure plan area with a lack of supporting information provided in the Environmental Assessment Report (Emerge 2026) (EAR). The EAR also does not quantity the amount of foraging habitat potentially present with insufficient assessable data from the surveys undertaken included to support the conclusions. DBCA advises that additional survey and supporting information should be provided for review to inform environmental referral requirements under the EPBC Act prior to further planning stages.<br><br>One Priority 4 species, the graceful sun moth (*Synemon gratiosa)* and one Priority 3 species, the black-striped snake (*Neelaps calonotos)* have been recorded on the site, with other priority species potentially present on the site. The Structure Plan notes that these species could be impacted by future subdivision and development activities and proposes the relocation of fauna as required. Any fauna relocation proposal will need to comply with the requirements of the BC Act and as such the proponent should contact DBCA's Species and Communities Branch for more information. | The EAR provides a Basic Fauna Survey in accordance with EPA Technical Guidance Fauna Surveys for Environmental Impact Assessment (EPA, 2020), undertaken in 2026. It also should be noted that the Black Cockatoo habitat assessment by Bamford in 2011 was undertaken for the entire Lancelin South area of 1398ha.<br><br>Black Cockatoo habitat, as noted in the EAR is a maximum of 322ha of 'poor' quality foraging habitat in accordance with the Bamford assessment. Additionally, there is 0.06ha of high-quality foraging habitat.<br><br>The referral of a project under the EPBC Act is based on a specific 'Action'. At the broadscale Structure Planning stage, it is not possible to identify with sufficient certainty the areas of vegetation that may ultimately be retained within POS, opportunities for the provision of additional habitat within parks, or other mitigation measures that may be incorporated through subsequent planning and development stages.<br><br>The requirement for an EPBC Act referral to relate to a specific Action avoids the need for broadscale, 'worst-case scenario' referrals where the extent of potential impacts and available mitigation measures cannot yet be accurately defined. Such an approach allows mitigation and avoidance measures to be appropriately considered and quantified as the project progresses through subsequent planning stages.<br><br>Importantly, the EPBC Act referral process also allows discrete components or parts of a larger project to be referred where appropriate, | |

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| | | | while considering the potential for cumulative impacts associated with the broader Action.<br><br>The proponent is aware of responsibilities under the EPBC Act.<br><br>Noted | |

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| | | **Ecological Communities**<br><br>It is unclear whether adequate survey for threatened and priority ecological communities has been undertaken due to a lack of supporting information provided in the EAR. DBCA advises that the EAR does not discuss the potential for the State BC Act and Commonwealth EPBC Act listed 'Sedgelands in Holocene dune swales of the southern Swan Coastal Plain' ecological community to be present on site with known occurrences located nearby, south of Lancelin.<br><br>The EAR (Emerge 2026) should be updated to address the potential for occurrence of the threatened ecological community within the Structure Plan area to inform mitigation and environmental referral requirements prior to further planning stages. | There were 70 sample sites for the vegetation survey and none recorded the TEC or recorded vegetation that could be considered to be representative of the TEC. Of the four sedge species typical to the TEC three were not present. *Ficinia nodosa* was recorded but not as a major component of any vegetation.<br><br>A search of the DBCA Database undertaken in late 2025 did not show any occurrence of FCT 19 within 20km of Lancelin South.<br><br>The TEC is wetland vegetation in Holocene dune swales. There was no wetland vegetation on the site. The soil mapping does not show any soil phases associated with the TEC such as:<br><br>211Qu_Qf3 Quindalup South Qf3 phase which are Relict foredunes forming a plain which is topographically lower than Qf2 with prominent ridges and swales. Swamps frequently occupy the swales. Deep calcareous sands with variable organic matter<br>Or<br>211QuW_SWAMP Quindalup South wet, swamp phase<br><br>The TEC does not occur on the site. | |

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| | | **Conservation Zone**<br><br>DBCA advises that whilst the Structure Plan proposes the protection of environmental values within 'conservation zones', there is a lack of detail provided in the report and supporting documentation to inform how long-term protection will be secured. As previously advised by DBCA, unless these areas are created as Crown reserves to be managed by the Shire of Gingin there is no certainty of their long-term protection. A commitment to retain the conservation value of this area was a major consideration in the environmental assessment of the planning scheme amendment (Local Planning Scheme No.9 proposed Amendment No. 3). Greater surety is required to guarantee the long-term purpose and protection of these sites through reservation.<br><br>Furthermore, in previous advice from DBCA regarding the planning scheme amendment (LND/634 November 2014) it was advised that any Environmental Management Plan (EMP) for areas set aside for conservation should be prepared and approved as part of the structure planning process, rather than as a condition of subdivision.<br><br>The preparation of an EMP, to the satisfaction of the shire and on advice from DBCA, should occur prior to any subdivision approvals. An EMP should address issues such as the management, enhancement and protection of the conservation zones, significant fauna and fauna habitat, the interface between future subdivision areas and the conservation zone, protection of any regionally significant vegetation, and formalised public access, if appropriate, and how these issues are to be addressed i.e. fencing, signage, access, building envelopes.<br><br>Additionally, a EMP should be prepared for the | The Structure Plan requires that the Conservation Zones will created as Crown reserves and will be managed by the Shire of Gingin.<br><br>The proposed development of Lancelin South has required amendments to the Shire of Gingin Local Planning Scheme. Initially the north-western corner of the Structure Plan area was subject to the Shire of Gingin Town Planning Scheme (TPS) No. 8 Amendment 93. The amendment was approved subject to conditions under Ministerial Statement 853 in 2011.<br><br>The north-south Conservation Area was included within the proposal, proposed to be zoned Conservation under the Shire of Gingin Local Planning scheme. The Ministerial Statement required the addition of provisions for the Conservation zone as follows::<br>i*) A minimum of 22.49 hectares (in accordance with Figure 1 of this Appendix) shall be set aside for vegetation conservation purposes and delineated in the Lancelin South Outline Development Plan as 'Conservation' zone;*<br>*ii) At the time of subdivision, the subdivider shall prepare and implement an 'Environmental Management Plan' to address the use and management of the land set aside for conservation purposes;*<br>*iii) The 'Environmental Management Plan' shall make provision for fencing, weed control, fire response and suppression, revegetation, and design and maintenance of pathways and public viewing areas (restricted access).*<br><br>A second Scheme Amendment, Shire of Gingin Local Planning Scheme 9 Amendment 3 was approved by the EPA as 'Scheme Not Assessed' in December 2014 – presumably | |

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| | | interface between the structure plan area and the 'conservation zone' within the adjacent Lot 2 as identified in the Shire of Gingin Local Planning Scheme No.9. | taking into account the comments provided by DBCA from Nov 2014.<br><br>The decision included the following statements:<br><br>*The EPA is of the view that Amendment 3 can meet its environmental objectives subject to the key environmental values being retained within the 70 hectare (ha) Conservation Zone.*<br><br>*In addition, to ensure clear and ongoing management responsibilities of the Conservation Zone, the EPA expects that the scheme text requiring the subdivider to prepare and implement an Environmental Management Plan should specify that it should be prepared and implemented to the requirements of the Shire of Gingin.*<br><br>The decision refers to the subdivider. It is noted that the scheme text has been altered from the wording as required under the Ministerial Statement.<br><br>Engineering and subdivision design will determine the risk factors and potential impacts to vegetation within the Conservation Zone. Accordingly, it is considered appropriate that the EMP be prepared at the subdivision stage in response to a condition of approval, when the design and associated risk factors are sufficiently defined. This timing is also consistent with the requirements of MS 853. It is therefore proposed that the EMP be prepared at subdivision stage. | |

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| | | **Vegetation Retention**<br>DBCA advises that there is insufficient information provided in the Structure Plan to identify and quantify vegetation and fauna habitat retention within the proposed Linear public open space (POS) areas and the Landscape Enhancement Area. The EAR stated that the impact to the graceful sun moth (Priority 4) will be partly abated through the retention of habitat within the linear POS and Landscape Enhancement Area. The potential for retention of vegetation and fauna habitat should be investigated further at the structure planning stage to inform subdivision requirements and not be delayed to subdivision stages.<br>The Structure Plan contains no specific information regarding the proposed widths of ecological corridors along the linear POS area. DBCA recommends that such details on placement and width of the corridors, as well as appropriate interface treatments between residential development and ecological corridors, should be addressed prior to the subdivision phase. | The width of POS corridors will be generally guided by the structure plan, topography and engineering design. The north-south corridor is identified as approximately 30m – 160m.<br><br>There will be limited ability to retain vegetation as part of public open space due to challenging topographical conditions and need for earthworks to develop a functional urban area. Opportunities for vegetation retention will be established through the subdivision process and vegetation / landform will be maintained wherever possible. Vegetation retention will also be balanced in the consideration of the provision of amenity in POS. It is noted that areas of vegetation retention have been reserved through Conservation Zones. | |
| | | The Bushfire Management Plan does not accommodate the retention of vegetation within the majority of the linear POS. DBCA advises that the retention of vegetation and fauna habitat is unlikely to meet the condition of a low threat vegetation level and should be updated accordingly to an appropriate BAL vegetation classification. An updated BMP should consider and incorporate the required retention of vegetation and ongoing protection requirements to inform updated bushfire attack levels. | The extent of retained vegetation in the POS corridor is subject to detailed design, and any bushfire threat from this vegetation can be adequately managed by road interface or managed public open space. BMP's at subdivision stage can adequately address this requirement once POS design has been established.<br><br>The level/density/location of habitat/vegetation that meets the definition of classified vegetation as per AS 3959 can only be identified at that stage. This will also be informed by the earthworks. | |

| No. | Submitter | Submission Details | Applicant's Response | Officer Response |
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| 6 | **Ratepayer (Not Supported)** | We are deeply concerned about the impact of the high-density housing as shown in the new amended structure plan for Lancelin South. This area, or anywhere nearby, has no infrastructure in place for employment for this sort of housing. Traffic congestion would increase along Indian Ocean Drive, this road is notorious for accidents already, and Lancelin Road. Our other concern is provisions of fresh water and safe and healthy disposal of effluent.<br>This needs to be proven to be sustainable for the future number of residents that will eventually live in this area. When we moved into the area 4 years ago it was with the knowledge that the area was going to have decent size blocks and we felt at the time that this would a sustainable and inviting place to live but all this has now changed with the new developer looking at how rich they can get with no concern about residents.<br>In conclusion, we strongly urge you to reconsider this amended structure plan. Whilst we recognise the need for more housing, we believe that high density housing is simply not the right fit for our neighbourhood. Thank you for your attention to this matter | The amended Structure Plan has been prepared with these matters in mind as noted below.<br><br>The amended Structure Plan provides for a R25-R60 density range which will provide for a range of different lot types, with smaller “higher density” to be provided where in close proximity amenity. This approach will concentrated density where this is desirable to meet market demands, however most development will be for larger lots of 350sqm – 700sqm, consistent with what has already been delivered at Lancelin South.<br><br>The traffic impacts associated the site have been modelled as part of the Traffic Impact Assessment (prepared by PJA) lodged with the amendment, demonstrating that all roads, including Indian Ocean Drive and Lancelin Road are able to operate sufficiently when considering the ultimate forecast volumes up to the year 2051. Road intersection treatments onto Lancelin Road and Indian Ocean Drive will be designed to optimize safety and improve traffic flow to these key roads.<br><br>On employment, the Structure Plan provides one industrial area which has partial subdivision approval, includes two neighbourhood centres and three local centres which are expected to provide a range of retail and commercial offerings. These are employment-generating land uses that do not presently exist in the locality, which will assist to provide employment opportunities to ensure a self-sufficient community at South Lancelin. The proposed floorspace is commensurate with the expected population for the site and | |

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| | | | will provide adequate job opportunities for future residents.<br><br>Water and wastewater services will continue to be managed by the Lancelin South Water Pty Ltd, a licensed water utility. Additional modular storage tanks and a new production bore will also provide further capacity and offset increases to demand as development progresses. | |

**Attachment A Planning Guidelines and Policy, and Indian Ocean Drive Planning**

**SPP1: State Planning Framework Policy**

- *Principle: Ensure infrastructure supports development*. Ii) protecting key infrastructure, including ports, airports, roads, railways and service corridors, from inappropriate land use and development;

**DCP 5.1: Regional Roads (Vehicular Access)**

General presumption on traffic and safety grounds against the creation of new driveways or increased use of existing accesses to regional roads. Where alternative access is or could be made available from side or rear streets or from rights of way, no access shall be permitted to a regional road unless special circumstances apply. *Quotes from the Policy:*

- 3.1.4 In summary, the capacity of regional roads to carry traffic, the safety of that traffic, and the free flow of traffic are all related to access - the fewer the number of driveways and junctions, the smoother the traffic flow and safer the road.
- 3.3.1 In considering applications for access on regional roads, the effects of the proposals on traffic flow and road safety will be the primary consideration. The more important the regional road, the greater the importance attached to these factors. In general, the WAPC will seek to minimise the creation of new driveways on regional roads and rationalise existing access arrangements.

**The Indian Ocean Drive Planning Guideline (2014)**

- broadly summarizes this: *'Main Roads resists new accesses or intersections to the IOD, in particular, no direct residential lot access is permitted'.*

**Indian Ocean Drive Planning Study and Access Strategy:**

- The Fact Sheet (April 2021) on this work provides the following information: 'Direct lot accesses and local road connections introduce potential conflict points for traffic on the road network. To optimise safety and efficiency on the network, we need to minimise the number of connection points, while allowing for appropriate levels of lot and network access.' Please refer to the link below for the Indian Ocean Drive Planning Study and associated information on this page. Indian Ocean Drive Planning Study | Main Roads Western Australia

**Attachment B  Mechanisms to protect the road network from unapproved access**

Main Roads uses the following mechanisms to inform planning/development proposals and lot owners where access to the State Road Network shall not be permitted by either new crossovers, driveways or roads. Both essentially serve the same purpose but the triggers for application and the mechanism under which they are employed are different.

**Restrictive Covenants on State or Local Government Roads**

- 'Restrictive Covenants' can be imposed under the Planning and Development Act 2005 (eg. Section 150) or the Transfer of Land Act (129BA). Where Section 150 applies where the parcel directly abuts a created road reserve and 129BA can be applied more broadly (including where there is a future road or a parcel between the subject lot and road).
- Applied as a condition of approval in the case of development applications/subdivisions and requiring exact definition of the affected portion of the boundary via a plan for lodgement on the Title (at landowners expense).

**Control of Access (CoA) on State Roads or Highways**

- Roads where access is controlled by Main Roads Western Australia under section 28A of the *Main Roads Act 1930* and *Local Government Act 1995 and regulated by the Local Government (Administration) Regulations 1996.*
- Created through a Gazettal process under proclamation by the Governor.

**Approval for access to the road network**

- This is a separate and distinct process from the planning process.
- The Local Government is required to consult with the Main Rods (Commissioner) in approving a crossover (driveway or road) and obtain approval in writing before approving. Reg 12 and Reg 14 of Local Government (Uniform Local Provisions) Regulations 1996
- If an access is approved through a planning approval, against Main Roads objections, the applicant is still required to seek approval for access, thereby rendering an invalid conditional approval (lacking finality).

**Taking the above into account, please find a summary of where the mechanisms have been applied to inform the requirement for no access to the IOD in this area:**

- Proposed Control of Access:  North of the Lancelin Road intersection applied as part of project to extend IOD to Cervantes. (D17#936658)
- Proposed Contol of Access: IOD dual carriageway when constructed.
- Existing Restrictive Covenants:  Lot boundary changes to subdivision immediately south of South Lancelin area as part of application proposal WAPC 162881
- Required Covenant:  South Lancelin. During Recent Subdivision Stages, Stage 2 and onwards, Main Roads has consistently required a condition on subdivision to include a covenant on the title advising on the prevention of access.
- Scheme/Structure Plan:  Advised previous Lancelin South structure plans no access supported.
- Existing Spite Strip:  Sea View Park on the opposite side of the IOD from South Lancelin Structure Plan applied a different method. Prior to placing a covenant on title, the method used at subdivision/development stage was to create a narrow spite strip running parallel to the road reserve boundary to prevent access.

## Attachment C 2026 Main Roads Response Email Following Meeting (D26#758240)

[redacted]

OFFICIAL

Hi Richard

Thanks for the discussion yesterday, please see attached transcript as requested.

As discussed in our meeting, Main Roads WA (Main Roads, MRWA) does not support the currently proposed structure plan amendment detailing the construction of a direct access from the Lancelin South Structure Plan area onto Indian Ocean Drive (IOD).

Main Roads WA has commenced the Indian Ocean Drive Planning Study (link) which aims to provide a safer and more efficient network whilst identifying long-term requirements for the route between Military Rd and Seaview Drive. The Planning Study Factsheet released in April 2021 states: "Direct lot accesses and local road connections introduce potential conflict points for traffic on the road network. To optimise safety and efficiency on the network, we need to minimise the number of connection points, while allowing for appropriate levels of lot and network access."

Furthermore, future plans for the IOD include dual carriageway between Breakwater Drive, Yanchep and Seaview Drive, Lancelin with a 14-metre wide, vegetated median or a narrow median with concrete barrier separation where there are constraints which would be inconsistent with supporting the proposed access.

The revised Structure Plan that PJA is referencing (endorsed 11 Jun 2013) is not consistent with the information provided in the Structure Plan & Outline Development Plan document and more recently endorsed Structure Plans (11 Jan 2018). The 2018 Structure Plan does not include any proposed access from the development area directly onto Indian Ocean Drive nor does the Master Plan provided on the Lancelin South website (link). The Concept Master Plan provided by PJA is also inconsistent with the approved and endorsed Structure Plans and none of the Structure Plans have the required traffic modelling or Traffic Impact Assessment (TIA) reports needed to make any assessment regarding the suitability of any proposed access onto Lancelin Road or Indian Ocean Drive.

The intention to encourage traffic to access the coast via the proposed internal road with direct access onto Indian Ocean Drive is also unsupported. This is likely to have an adverse transport impact on the surrounding area through the generation of recreational traffic on low-volume residential roads past sensitive uses such as schools and encourage rat-running through a residential area. The additional access point is also inconsistent with the Indian Ocean Drive Planning Guideline (link) published in 2014 which states "In general, Main Roads resists new accesses or intersections to IOD. In particular, no direct residential lot access is permitted." Section 5 of the Planning Guideline provides guidance of how developments can safeguard the road's key function as a 'scenic, coastal tourist route'.

The introduction of an additional intersection will only increase the potential for conflict on Indian Ocean Drive and increases road user exposure risk. Additionally, crash history for the 5 years between 2020 and 2024 show there were 4 reported crashes including 3 Fatal or Seriously Injured crashes involving right turns either into or out of Lancelin Road.

The staging plan and timeframes for the approved section of the sub-division development area is uncertain and there is additional uncertainty regarding the timeframes for future stages of the development area.

Main Roads WA is confident the above details clearly state the reasons we are not able to consider any access onto Indian Ocean Drive. This information will also help clarify the required future planning tasks for the Lancelin South Structure Plan area. This response is consistent with the responses provided by MRWA to the WAPC for previous structure plan reviews and sub-division referrals including WAPC applications 163013, 162881, 164479, 201298 and 202157.

Please feel free to contact me should you require any clarification regarding the above.

Regards,

**Anthony Williams**
Asset Manager
Mid West - Gascoyne Region
Regional Operations
Tel: +61 8 9956 1261




Main Roads acknowledges the traditional custodians throughout Western Australia and their continuing connection to the land, waters and community. We pay our respects to all members of the Aboriginal communities and their cultures; and to Elders both past and present.

## Appendix D MRWA Response to Lancelin South Structure Plan Stage 2, 2016

mainroads WESTERN AUSTRALIA

Enquiries: Isabel Huston on 08 9956 1238
Our Ref: 15/7984, D16#499555
Your Ref: LND/137

6 September 2016

Kylie Bacon
Manager Statutory Planning
Shire of Gingin
7 Brockman Street
Gingin WA 6503

By email: msp@gingin.wa.gov.au

Dear Ms Bacon

**Proposed Stage 2 Lancelin South Structure Plan**

Thank you for consulting Main Roads on the proposed Stage 2 Lancelin South Structure Plan in regard to Lot 9001 Lancelin Road, Lancelin.

Section 5.1.2.1 of the structure plan recognises the subdivision and development requirements for the 'Landscape Protection' zone abutting Indian Ocean Drive. Main Roads has no objection to the proposed structure plan subject to the Shire of Gingin imposing our recommendation that section 5.1.2.1 is reworded or similarly to include the requirement that:

- No direct vehicle access shall be permitted to or from Indian Ocean Drive within the 'Landscape Protection' zone as per section 3.3 Development Control Policy 5.1 – Regional Roads (Vehicular Access). All vehicle access is to be taken from local roads and internal subdivision roads; and
- Uniform fencing shall be required on the boundary between Indian Ocean Drive road reserve and the adjacent lots created at subdivision.

Please forward a copy of Council's final determination on this proposed development, quoting file reference: 15/7984 (D16#499555). If you would like any further information please contact Isabel Huston on 9956 1238.

Yours sincerely

Bernie Miller

Bernie Miller
**Regional Manager**
**Mid West-Gascoyne Region**

**Main Roads Western Australia**
Mid-West Gascoyne
Geraldton Office, Eastward Road, PO Box 165, Geraldton WA 6531
Carnarvon Office,470 Robinson Street, PO Box 480, Carnarvon WA 6701

mainroads.wa.gov.au
enquiries@mainroads.wa.gov.au
138 138

## Appendix E Indian Ocean Drive and Lancelin South

Indian Ocean Drive is a scenic coastal drive opened in 2010. The highway was built in a bid to divert traffic and tourists off the Brand Highway, a busy freight route, and provide easy access to popular tourist destinations such as the Pinnacles Desert, Nambung National Park, Lake Thetis, Lesueur National Park, Stockyard Gully National Park and the small coastal towns of Lancelin, Cervantes, Jurien Bay, Green Head and Leeman.

Due to its proximity to the ocean, panoramic views and the many opportunities to take a break in beachside communities, the route has grown in popularity with tourists and local travellers alike. In 2019 Tourism WA launched a global campaign promoting Western Australia as the 'home of the road trip' and Indian Ocean Drive is one of the routes notably featured in this campaign.

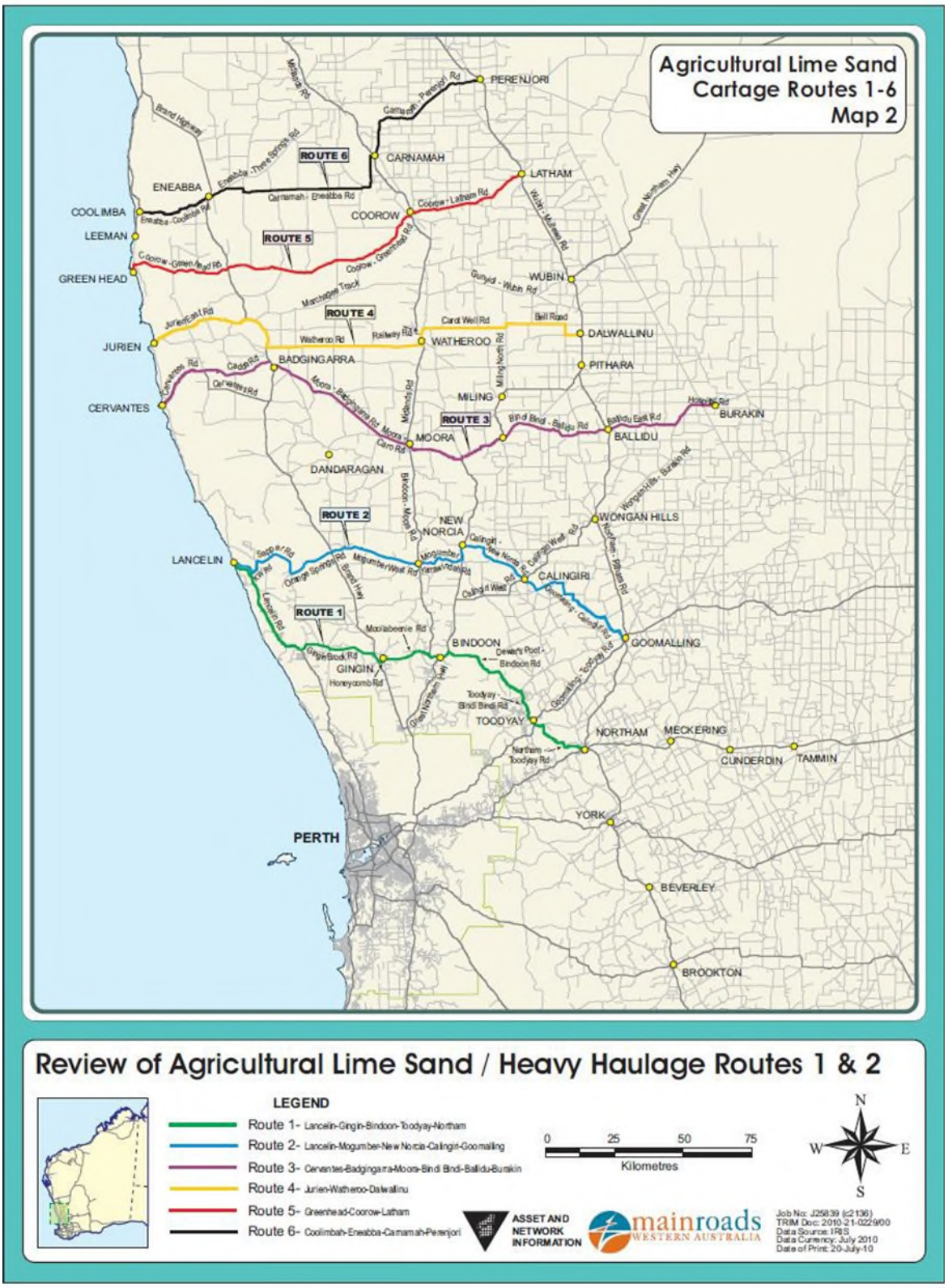
Indian Ocean Drive and Brand Highway are north/south roads, connecting Perth with the northern regions of the State, and part of Western Australia's State Road Network operated and maintained by Main Roads Western Australia. The Indian Ocean Drive has RAV 4 rated sections and is promoted as a tourist route. The section of the IOD from Shire of Gingin Boundary to Cervantes is predominantly not part of the RAV (Restricted Access Vehicles) or Tandem Drive Network and therefore prevents the IOD being used as a through route for the larger vehicle classes. Brand Highway, which runs parallel further inland, is the main restricted access vehicle (RAV) route.

Also needing consideration and of economic significance in this area are the major Agricultural Lime Sand Cartage RAV 4 routes that run east/west linking coastal areas (the source of lime) with inland agricultural areas. These routes are key to maintaining the productive capacity of the crops in the grain belt of Western Australia by facilitating the safe and efficient cartage of agricultural lime sand.(see Appendix E)

As a result of the above there are peak periods during school holidays that coincide with lime sand cartage on Indian Ocean Drive. These periods can result in significantly increased traffic and turning movement at intersections.

The Indian Ocean Drive Planning Study | Main Roads Western Australia complements the recently completed safety upgrades and will assess future demand for the road, including potential land development, access requirements and traffic volumes. These can be found under the 'History' heading on this site.

## Appendix F Agricultural Lime Sand Cartage Route 1 - 6



Department of Biodiversity, Conservation and Attractions
GOVERNMENT OF WESTERN AUSTRALIA
PARKS AND WILDLIFE SERVICE

We're working for Western Australia.

Your ref: LND/0137
Our ref: PRS 39862
Enquiries: Alex Hutchinson
Phone: 9219 9525
Email: alex.hutchinson@dbca.wa.gov.au

Development Services
Shire of Gingin
PO BOX 510
GINGIIN WA 6503

**Attention: Casimir Penheiro**

**PROPOSED AMENDMENT LANCELIN-SOUTH STRUCTURE PLAN 2026**

I refer to your correspondence of 4 June 2026 requesting comments on the proposed amendment to the Lancelin-South Structure Plan. The Department of Biodiversity, Conservation and Attractions (DBCA) has reviewed the proposal pursuant to DBCA's responsibilities under the *Biodiversity Conservation Act 2016* (BC Act) and the *Conservation and Land Management Act 1984.* DBCA has previously provided advice to the Shire of Gingin regarding the Lancelin South Structure Plan, Lancelin South Outline Development Plan, and the Stage 2 Lancelin South Structure Plan. The advice provided below is consistent with DBCA's previous comments.

**Fauna**

DBCA is aware that Carnaby's black cockatoos (*Zanda latirostris*) were recorded on site during a fauna survey by Ecoscape in 2008, and that the subject area contains foraging habitat for black cockatoos. Black cockatoos are listed as threatened species under the State BC Act and Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). It is unclear whether recent comprehensive fauna surveys have been taken across the entire extent of the structure plan area with a lack of supporting information provided in the Environmental Assessment Report (Emerge 2026) (EAR). The EAR also does not quantity the amount of foraging habitat potentially present with insufficient assessable data from the surveys undertaken included to support the conclusions. DBCA advises that additional survey and supporting information should be provided for review to inform environmental referral requirements under the EPBC Act prior to further planning stages.

One Priority 4 species, the graceful sunmoth (*Synemon gratiosa*) and one Priority 3 species, the black-striped snake (*Neelaps calonotos*) have been recorded on the site, with other priority species potentially present on the site. The Structure Plan notes that these species could be impacted by future subdivision and development activities and proposes the relocation of fauna as required. Any fauna relocation proposal will need to comply with the requirements of the BC Act and as such the proponent should contact DBCA's Species and Communities Branch for more information.

**Ecological Communities**

It is unclear whether adequate survey for threatened and priority ecological communities has been undertaken due to a lack of supporting information provided in the EAR. DBCA advises that the EAR does not discuss the potential for the State BC Act and Commonwealth EPBC Act listed 'Sedgelands in Holocene dune swales of the southern Swan Coastal Plain'

**Swan Region**
Locked Bag 104, Bentley Delivery Centre, Western Australia 6983
Corner Australia II and Hackett Drive, Crawley WA 6009
dbca.wa.gov.au

ecological community to be present on site with known occurrences located nearby, south of Lancelin. The EAR (Emerge 2026) should be updated to address the potential for occurrence of the threatened ecological community within the Structure Plan area to inform mitigation and environmental referral requirements prior to further planning stages.

**Conservation Zone**

DBCA advises that whilst the Structure Plan proposes the protection of environmental values within 'conservation zones', there is a lack of detail provided in the report and supporting documentation to inform how long-term protection will be secured. As previously advised by DBCA, unless these areas are created as Crown reserves to be managed by the Shire of Gingin there is no certainty of their long-term protection. A commitment to retain the conservation value of this area was a major consideration in the environmental assessment of the planning scheme amendment (Local Planning Scheme No.9 proposed Amendment No. 3). Greater surety is required to guarantee the long-term purpose and protection of these sites through reservation.

Furthermore, in previous advice from DBCA regarding the planning scheme amendment (LND/634 November 2014) it was advised that any Environmental Management Plan (EMP) for areas set aside for conservation should be prepared and approved as part of the structure planning process, rather than as a condition of subdivision. The preparation of an EMP, to the satisfaction of the shire and on advice from DBCA, should occur prior to any subdivision approvals. An EMP should address issues such as the management, enhancement and protection of the conservation zones, significant fauna and fauna habitat, the interface between future subdivision areas and the conservation zone, protection of any regionally significant vegetation, and formalised public access, if appropriate, and how these issues are to be addressed i.e. fencing, signage, access, building envelopes.

Additionally, a EMP should be prepared for the interface between the structure plan area and the 'conservation zone' within the adjacent Lot 2 as identified in the Shire of Gingin Local Planning Scheme No.9.

**Vegetation Retention**

DBCA advises that there is insufficient information provided in the Structure Plan to identify and quantify vegetation and fauna habitat retention within the proposed Linear public open space (POS) areas and the Landscape Enhancement Area. The EAR stated that the impact to the graceful sunmoth (Priority 4) will be partly abated through the retention of habitat within the linear POS and Landscape Enhancement Area. The potential for retention of vegetation and fauna habitat should be investigated further at the structure planning stage to inform subdivision requirements and not be delayed to subdivision stages.

The Structure Plan contains no specific information regarding the proposed widths of ecological corridors along the linear POS area. DBCA recommends that such details on placement and width of the corridors, as well as appropriate interface treatments between residential development and ecological corridors, should be addressed prior to the subdivision phase.

The Bushfire Management Plan does not accommodate the retention of vegetation within the majority of the linear POS. DBCA advises that the retention of vegetation and fauna habitat is unlikely to meet the condition of a low threat vegetation level and should be updated accordingly to an appropriate BAL vegetation classification. An updated BMP should consider and incorporate the required retention of vegetation and ongoing protection requirements to inform updated bushfire attack levels.

Thank you for the opportunity to comment on this proposed structure plan. Please contact Alex Hutchinson at Parks and Wildlife's Swan Coastal District office on 9303 7700 or by email at alex.hutchinson@dbca.wa.gov.au if you have any queries regarding this advice.

Yours faithfully,



Kim Onton
A/REGIONAL MANAGER

02 July 2026