



10 July 2014

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Appeals Convenor  
Office of the Minister for the Environment  
Level 22 Forrest Centre  
221 St George's Terrace  
Perth, WA 6000

Dear Appeals Convenor

**EPA report 1518 Keane Rd Strategic Link, Forrestdale  
Comment by Urban Bushland Council WA Inc.**

The Urban Bushland Council strongly supports both the EPA's assessment of the PER for the Keane Road Strategic Link as proposed by the City of Armadale, and the EPA's conclusion that the proposal will have significant residual impacts, is environmentally unacceptable, and should not be implemented.

In particular, the EPA's recommendations 1-3 are strongly supported, as is the need for consolidation of Bush Forever Area 342 as stated in recommendation 5. Indeed we recommend that the Minister supports and directs the immediate consolidation of the whole of the Bush Forever Area (including the local road reserve) including transfer of land tenure under the Land Administration Act to the Conservation Commission as an A class Nature Reserve vested for the purpose of nature conservation and public appreciation.

The suggested alternative proposal for an elevated bridge over the site is not supported as this would still have residual and unacceptable impacts and would still breach the principles of conservation of biological diversity and ecological integrity, intergenerational equity and the precautionary principle.

Fragmentation of the outstandingly significant Anstey-Keane Damplands as described by the EPA would have catastrophic impacts on its sensitive and complex hydrological processes, groundwater dependent ecosystems, flora and fauna. The Anstey-Keane Damplands are of national significance and should be listed on the Register of wetlands of national significance as are the Brixton Street wetlands in Kenwick.

The Urban Bushland Council draws to the Minister's attention the fact that this road reserve is classed as a local road rather than a regional road, and that local roads were supposed to have been removed from Bush Forever sites. Also another earlier proposal by the Water Corporation for a water pipeline through Bush Forever site 342 was relocated outside the Bush Forever site.

## Conclusion

The Urban Bushland Council strongly recommends that the Minister:

1. accepts the EPA advice and recommendations, and that under the Environmental Protection Act, he declares the proposal and any modification to it as environmentally unacceptable and cannot be implemented;
2. advises the Water Corporation and other utilities that any future and current proposals within or impacting on this highly significant Bush Forever area - the Anstey-Keane Damplands - will not be permitted;
3. directs the immediate consolidation and vesting of the whole of Bush Forever Area 342 as an A class Nature Reserve with management by DPAW;
4. provides a significant new allocation of staff and funding for the continued study and on-ground management of the Anstey-Keane Damplands - which are of national and undoubtedly international significance.

Representatives of the Urban Bushland Council will appreciate the opportunity of discussing these matters with you. We may be contacted through our office on 9420 7207 or email [ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

Yours sincerely

President  
Urban Bushland Council WA Inc.

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