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Appeal against the granting of a clearing permit CPS9448-1

Great Western Highway Bypass Interchanges (Roe Highway and Abernethy Road)

The proposal includes the upgrade to Roe Highway between Kalamunda Road and Clayton Street, including a duplication of the bridge over the Helena River, and grade separation at the intersection of Roe Highway and Great Eastern Highway.

The proposal (EPBC 2020/8784) is a controlled action. The proponent indicated there would be a significant impact due to 'listed threatened species or any threatened ecological community'. The EPBC Act Referral has details that the Proposal will receive \$144 million from the Commonwealth Government and \$36 million from the State Government

The proponent maintains the proposal is not a 'significant proposal' (therefore there is no intention to refer it to the EPA). However, the proposed clearing is up to 31.03 hectares in a highly cleared landscape.

Aboriginal sites

It is very concerning that the development area 'traverses five registered Aboriginal Heritage sites' and eight 'Other Heritage Places.'

Fauna

The Biota survey confirmed two black cockatoo species in the survey area. 1,622 habitat trees lie within the Biota survey area- DBH >500mm, 4 with hollows, and one having chewed edges. It is not clear how many of these trees would be cleared in the current proposal. The UBC submits that clearing of all, or a proportion of the trees is significant and some compensation must be made if the proposal proceeds.

Quenda were confirmed. We ask 'Are there any areas into which Quenda can be relocated?'

Wetlands

2.47 has of a Conservation Category Wetland is in the Development Envelop and 1.98 ha is in a multiple Use Wetland 'associated with the FCT 20a community. Although FCT 20a is being protected from clearing, dewatering could have a serious effect on the community.

Bush Forever sites.

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|--------|-------------------------|--------------------|--|
| BF 481 | Stirling Court Bushland | 15.94 ha in the DE | 31.15% reduction |
| BF 122 | Hawkvale Bushland | 0.01ha | Excellent – VG condition. 0.07 reduction |
| BF 213 | Bushmead Bushland | No impact | Adjacent to the DE |

The Greater Connect Alliance document states that BF site 481 is '*already fragmented by the existing Roe Highway alignment, the proposal will reduce the size of both east and west patches. The small reduction in Bush forever site 122 is due to boundary creep*' (p16)

The UBC suggests that alternatives are sought to road design so that BF sites are not impinged upon. Bush Forever sites should be protected with a passion rather than reduced and fragmented.

Vegetation communities

Photographs of the various vegetation units in the Biota Biological Survey reveal the quality of the various communities and the degree of water over the area. Most areas are in really good condition.

- In low-lying damp depressions 'Melaleuca over Sedges' – condition Excellent, seasonally damp depressions 'Swamp Teatree over Sedges' – condition Excellent)
- 'Jacksonia over Xanthorrhoea with Sedges' condition - Good
- 'Allocasuarina and Banksia over Xanthorrhoea with Sedges' vegetation condition - Excellent to Degraded with the majority - Very Good
- 'Marri over Kingia australis with Sedges' vegetation condition - Excellent to Very Good.
- 'Eremaea Open Heath' vegetation - Excellent to Very Good
- 'Jarrah over Xanthorrhoea with Mixed Shrubs and Herbs' vegetation – Very Good to Degraded, with the majority considered being Very Good
- 'Jarrah and Banksia over Xanthorrhoea with Sedges' - Excellent to Degraded, with the majority considered Very Good and
- 'Melaleuca Low Open Forest over Weedy Understorey' – Excellent to Degraded
- 'Marri over Melaleuca Low Open Woodland on Clay Pits' - 'Good to Degraded'
- 'Mixed Sedge Dampland' - Degraded
- 'Flooded Gum over Weedy Grasses on Floodplain' - Degraded
- 'Flooded Gum over Weedy Understorey on Riverbank' - Degraded.

The Supporting Document for Main Roads by Greater Connect Alliance describes how the entire development envelope has been quantified, whereas the footprint is significantly smaller to allow for flexibility in refining the design. The minimum impact to native

vegetation is the Project's objective. Also the document describes 'Measures to Avoid, Minimise, Reduce and Manage Project Clearing Impacts.' (2.4)

By these measures, Main Roads has 'completely avoided any clearing of the Shrublands and Woodlands of the Eastern Swan Coastal Plain TEC.'

The Urban Bushland Council Inc recognises efforts made to minimise clearing, and the measures taken.

The issue is the value placed on vegetation and fauna protection and appreciation, versus providing free flowing traffic movement in an ever-increasing clogged up traffic-dominated city.

The UBC requests the opportunity to meet with you.

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