



The Urban Bushland Council WA Inc. makes the following submission on EPA Assessment 2293.

**‘Tonkin Highway Grade Separated Interchanges (Hale Rd & Welshpool Rd) – Additional Information’**

ERD prepared by Main Roads. **Upgrade to 6 lane dual carriageway.**

**EPA assessment no. 2293**

**Proponent request to change proposal during assessment under S43A of EP Act:**

1. Main Roads states that the changes are the result of removal of the 14.62 ha portion of the northern extent of the development envelope as this area as is covered by native vegetation Clearing Permit – CPS 524/25.

Notably this alone is significant clearing and should not be permitted.

The loss of this area must be considered as part of this overall assessment by the EPA as it is part of the significant cumulative impact.

**Thus, it is recommended that this 14.2 ha not be ‘removed’ from the assessment.**

2. Also 3 additional areas – total 1.18 ha are proposed to be added to the development envelope.

**Bush Forever incursion:** Notably the proposal includes clearing in two Bush Forever sites – Hartfield Park (BF 320), and Greater Brixton Street Wetlands Kenwick (BF 387).

We submit that any clearing and incursions into Bush Forever sites and thus in the Comprehensive, Adequate and Representative (‘CAR’) conservation reserve system is environmentally unacceptable and should not be permitted. Furthermore, the two Bush Forever sites impacted are extremely species rich and are of the highest conservation value.

**EXTENT OF CLEARING**

The total area of development of 51.5 ha includes clearing or disturbance of up to **20.42 ha** of native vegetation and 1.80 ha of non-native vegetation and revegetation suitable for fauna habitat.

**The changes to the proposal are:**

- Reduction of 13.4 ha in the development envelope from 64.9 ha to 51.5 ha;
- Reduction of 1.39 ha in the extent of native vegetation clearing from 21.81 ha to 20.22 ha;
- Reduction of 6.58 ha in extent of fauna habitat clearing from 22.8 ha to 22.22 ha of which 1.80 ha is non-native vegetation/revegetation suitable for fauna habitat.

**Areas where there will be an increase in clearing:**

- There will be a total increase of 1.18 ha of clearing in 3 areas.
- **Bush Forever:** There will be an **increase of 0.55 ha** in the extent of Bush Forever sites that will be cleared from 12.96 ha to 13.51 ha.  
0.33 ha of this increased area is vegetated.

The fact that some of a Bush Forever site is already disturbed or cleared does not excuse this incursion.

There should not be any further incursions whatsoever into Bush Forever sites.

In addition, clearing in the buffer zone adjacent to Bush Forever sites will have significant edge effects and changes to hydrology and this is unacceptable.

- 7 'significant flora individuals' will be cleared.
- The extent of Conservation Category Wetland (CCW) vegetation that will be cleared will increase by 0.17 ha (from 9.37 ha to 9.54 ha). The increase represents 0.3% of the total area of the wetland.

All proposed clearing of CCW vegetation and indeed of all categories of wetlands is environmentally unacceptable.

Also, such wetlands will be subject to flooding in extreme weather events and thus the Tonkin Highway could flood.

Infrastructure including roads should not be allowed to be constructed in CCW or other wetland and low-lying areas.

- **Linear clearing:** the impacts of clearing will be much greater than stated due to the shape of linear clearing that will have a long edge disturbance effect along the side of the native vegetation. This is clearly evident in looking at the map shown in Figure 1 on page 3 – especially through Forrestfield and into Wattle Grove and Kenwick. Notably these areas are also extremely species rich being adjacent to the Greater Brixton Street Wetlands.

With the changes, there will still be a remaining very significant impact on the environment, as well as a significant increase in impact on the environment.

## **IMPACTS ON KEY ENVIRONMENTAL FACTORS FOR THE PROPOSAL**

### **1. Flora and Vegetation**

Up to **20.42 ha** of native vegetation will be cleared and lost, some of which is Banksia Woodland of the Swan Coastal Plain endangered ecological community listed under the *EPBC Act*.

To be consistent with the Approved Conservation Advice for this TEC, none of this should be cleared. The Advice states: '*PROTECT the ecological community to prevent its further loss of extent and condition*'. This means that clearing of this TEC is environmentally unacceptable and must not be permitted.

**1.61 ha** of the endangered **SCP 20a** (*Banksia attenuata* woodland over species rich dense shrublands) TEC will be cleared and lost. There is so little of this TEC remaining. Therefore, this impact is significant and is environmentally unacceptable.

**4.42 ha** native vegetation mapped as **Guildford Complex** will be cleared and lost. As only **5.3%** of this complex remained in 2015, and with **only 0.5%** secure for conservation as at 2015, it is critically important that all this proposed clearing not be permitted.

This complex is highly species rich. It cannot be offset, all that remains must be protected.

**13.51 ha of Bush Forever sites** in BF 320 – Hartfield Park, and across the road in BF 387 – Greater Brixton Street Wetlands Kenwick – will be cleared and there will be very significantly increased edge disturbance impacts as described above.

These are very high conservation value sites. Bush Forever sites are all part of the (whole of government) 'CAR' conservation reserve system for the Swan Coastal Plain portion of the Perth Metropolitan Region.

This proposed clearing is totally unacceptable and it is strongly recommended that no clearing of, or incursion into, these Bush Forever sites be permitted.

Because the proposed clearing is linear in shape, the edge disturbance impacts will be very significant and this is unacceptable.

**Significant flora:** There will be a loss of 3 *Banksia mimica*; up to 62 *Conospermum undulatum*; and a loss of up to 119 individuals of *Johnsonia pubescens* subsp. *cygnorum*.

#### **Avoidance applies, offsets not applicable**

We agree with Main Roads that the proposal will result in significant residual impacts due to the loss of significant native vegetation and flora.

However, we disagree strongly with Main Roads that avoidance and mitigation measures and the Offset Strategy proposed to address those potential impacts will ‘counterbalance’ the impact.

There will be a significant net loss which will remain as a significant residual impact that is environmentally unacceptable.

Therefore, the avoidance principle applies.

Thus, it is strongly recommended that all this clearing of flora and vegetation be avoided and not be permitted.

**The very significant impacts on flora and vegetation alone are reason that this road widening project which is environmentally unacceptable should not be permitted.**

## **2. Inland Waters**

**9.54 ha of Conservation Category Wetlands (CCW)** will be cleared and impacted.

As stated above, this is totally unacceptable. CCW are supposed to be protected.

There will also be significantly altered hydrology with changes to surface water and drainage flows. This will also have unacceptable impacts on the surrounding wetland vegetation.

The proposed Tonkin Highway upgrade project goes through the eastern side of the Swan Coastal Plain which is low lying and inherently rich in vegetated wetland flora species. These proposed significant road works will have significant hydrological impacts.

## **3. Terrestrial Fauna**

The removal of 22.02 ha of fauna habitat will have a significant impact on:

- Quenda
- Perth lined Ierista (P4)
- The 3 species of endangered black cockatoo with habitat loss including clearing 141 potential breeding trees and clearing 18.54 ha foraging habitat of low value for Carnaby’s Cockatoo. All decreases with clearing of habitat of the endangered Carnaby’s Cockatoo are environmentally unacceptable. All the proposed clearing will include loss of Carnaby’s habitat.
- Loss of 7.88 ha of high to moderate value foraging habitat, and 11.06 ha of moderate to low value foraging habitat for Baudin’s Cockatoo and for Forest Red-tailed Black Cockatoo.
- Barriers to fauna movement will be significant.

These significant impacts on fauna are environmentally unacceptable and therefore should not be permitted. There will be significant residual impacts as stated by Main Roads.

The Environmental Offset Strategy will not counterbalance these residual impacts and there will still be a net loss.

Thus, the offsets do not justify approval of the clearing.

## **4. Greenhouse gas emissions**

All clearing results in production of Greenhouse Gas Emissions and of loss of carbon sequestration. This consideration in the assessment should be made.

Also, the road construction process produces emissions from construction vehicles and from materials produced for the road surface. The total production of emissions should be included and assessed by the EPA.

## **CONCLUSION**

- 1. We submit that the case for increasing the width of the Tonkin Highway to a 6 lane dual carriageway is not justifiable. The significant impacts on this very sensitive natural landscape cannot be offset.**
- 2. Because of the very significant impacts on the key environmental factors, the proposal is environmentally unacceptable, and it is strongly recommended that the proposal be refused.**

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