



SUBMISSION GUIDE - ANKETELL ROAD UPGRADE

Widening Anketell Road mostly to the west of Kwinana Freeway

Submissions due 18 August with EPA

Submissions here: <https://consultation.epa.wa.gov.au> or
<https://consultation.epa.wa.gov.au/open-for-submissions/anketell-road-upgrade/>

Main Roads is proposing to upgrade and widen Anketell Road to an Expressway Standard for approximately 7.5 km from Leath Road across the Kwinana Freeway just past Treeby Road in the City of Kwinana. There will be grade separated interchanges at six locations, grade separation of road over rail at two locations as well as other road infrastructure.

The **Environmental Review** documents show a proposed loss of 92 ha of native vegetation – including 40 ha of the Threatened Ecological Communities Tuart woodlands and forests of the SCP and 14 ha Banksia Woodlands of the SCP. There will also be a concurrent loss of 4 ha native vegetation from Bush Forever sites as well as significant loss of foraging habitat for Carnaby's and Forest Red-tail Black Cockatoo species.

UBC's general advice for effective submission writing is to state your position at the start; comment under specific headings and give a strong concluding paragraph. It is **very helpful to personalise your story** using one or more of these ideas:

- *I am/we are active community conservation volunteer/s caring for my/our local bushland [NAME IT]. I am also aware of the importance of ecological linkages between our patches*
- *I have knowledge/understanding about our local environment and the interconnectedness of patches of neighborhood nature*
- *What is important to you..... (eg keeping what we still have...)*
- *What are you concerned about... (eg impacts on hydrology / removal of bushland with impacts on fauna (inc insects, reptiles, birds, marsupials))*

Submissions should also be concise, respectful, evidence-based, and aligned to the EPA's environmental factors and principles. We have 10 issues you might consider including.

Summary

The project area includes high-value, remnant vegetation on the Swan Coastal Plain, much of which has already been heavily cleared. Several threatened ecological communities (TECs) and Bush Forever sites (including The Spectacles) occur within or adjacent to the development envelope, making the area ecologically significant and worthy of highest-level protection.

The proposal, as currently designed, does not appear to meet the EPA's objectives for the key environmental factors of flora and vegetation, terrestrial fauna, or inland waters. It also appears inconsistent with the EPA's principles of biodiversity conservation and intergenerational equity.

We call on the EPA to either require a major redesign to avoid high-conservation value areas or recommend any approval requires the application of stringent conditions.

Flora and Vegetation

The project will clear substantial areas of two federally listed Threatened Ecological Communities (TECs)—Tuart Woodlands and Banksia Woodlands—as well as a Priority Ecological Community. These are irreplaceable ecosystems with shrinking distributions. The scale and permanence of these losses conflict with both state and federal recovery objectives.

Terrestrial Fauna

The area supports important habitat for three endangered black cockatoo species—Carnaby’s, Baudin’s, and Forest Red-tailed cockatoos—including known roosting sites, mature hollow-bearing trees, and foraging vegetation. Habitat removal and fragmentation will further threaten their regional viability.

Inland Waters

Seasonally waterlogged areas and shallow groundwater-dependent ecosystems in the project area are vulnerable to changes in hydrology caused by drainage modifications and soil disturbance. These inland water systems support unique flora and are difficult to restore once degraded.

Cumulative Impact

The **Cumulative Impact** of this proposal does not appear to have been fully considered. There has been ongoing clearing, infrastructure expansion, and urban growth in this southern corridor. We believe there has been insufficient recognition in these documents of the cumulative impact of habitat and species loss.

There should be more ‘Avoid’ in the proposal

Many of the claims in the review documents around ‘avoid’ are considered by the conservation community to be ‘minimisation’. We would like to see better attempts at true avoidance. The proposal doesn’t demonstrate strong exploration of alternatives through cleared or degraded land, nor novel engineering solutions that are nature friendly. Surely there must be more opportunity to deliver critical infrastructure through smarter and lower impact planning.

Offsets

The offset strategy relies heavily on sites located far from the impact area and within already fragmented landscapes. Offsets should be local, in-kind, and secured through binding management agreements. They should also have the potential to deliver long term ecological benefit.