



## SUBMISSION - ANKETELL ROAD UPGRADE (LEATH ROAD TO 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/>

### Introducing the Urban Bushland Council

The Urban Bushland Council WA Inc. (UBC) is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. We are a voluntary community association with an active membership of more than 90 **volunteer groups** (each with their own local membership from 10-165 individuals) and an additional **100+ individual 'supporter' members** – all with a common interest in conservation and protection of areas of urban bushland in WA. More details at <https://www.bushlandperth.org.au/>. We recently celebrated 30 years of advocacy for the protection of urban bushland.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature.

UBC advocates for:

- Protection, conservation and active management of urban bushlands, wetlands and their ecological linkages
- Ending the clearing of native vegetation in urban areas
- Increasing tree canopy cover in urban areas to a minimum of 30 %
- More investment in urban bushland/ wetlands/ coastal heaths
- Better detection, control, reduction and management of threatening processes in urban bushland/ wetlands/ coastal heaths
- Urban planning that results in net positive vegetation outcomes and conserves biodiversity

### Overview of the proposal

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. We note also that this is the first stage of the Anketell – Thomas Road Freight Corridor – the long-term plan for a strategic east-west freight link between Kwinana and Tonkin Highway in Oakford. ([Westport website](#))

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. The Development Envelope (DE) contains parts of Bush Forever sites (including The Spectacles), an acknowledgement that the area is ecologically significant and worthy of highest-level protection.

UBC believes that the proposal, as currently designed, does not 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. There is insufficient use of the principle 'avoid' and most of the environmental offsets are far from the DE. 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 Forests of the Swan Coastal Plain (critically endangered) and Banksia Woodlands of the Swan Coastal Plain (endangered)—as well as a Priority Ecological Community (PEC). The vitality and biodiversity in native vegetation in this area is amazing despite repeated excisions for the road reserve of at least 9 metres, construction of 33000 Kw power lines, other smaller power lines and two minor roads.

These vegetation types have diminished distributions and any further loss conflicts with both state and federal recovery objectives. In addition, some of this vegetation loss is from Bush Forever sites that are intended by the WA State Government to be in long-term protection.

Also of deep concern is that the loss of 40 ha of critically endangered Tuart Woodland, much of it in good condition, can be declared by the proponent as 'not significant'. The impact of recent hot fires to the south of this area was the loss of habitat trees, and this has not been acknowledged in the proposal.

Another concerning assertion by the proponent is that the clearing proposed would not be sufficient to result in a PEC being classified as a TEC. The recent report from the Office of the Auditor General (Conservation of Threatened Ecological Communities) highlighted that DBCA currently have a list of 390 PECs and is only working slowly through that list to identify those that should be classified as TECs. Clearly, whether a PEC is already due for classification as a TEC is unknown. In that uncertainty, UBC believes that the precautionary principle requires we consider all PECs as if TECs.

There does not appear to have been any consideration given to using either Rowley Road or Thomas Road as alternatives or nor the possibility of converting either of those two roads to two lanes one way in or out from Leath Road to the Kwinana Freeway.

For the protection of the TECs in this proposal, UBC calls for the transport corridor to be realigned away from them and designed to truly avoid destruction of unique and possibly irreplaceable native vegetation.

## **Terrestrial Fauna**

The area supports important habitat for endangered black cockatoo species—Carnaby's and Forest Red-tailed cockatoos—including known roosting sites, some mature hollow-bearing trees, and foraging vegetation. Habitat removal and fragmentation will further threaten their regional viability. The populations of black cockatoo species are declining and will be further exacerbated by the loss of the foraging trees identified in this proposal. The black cockatoo recovery plans should be assiduously followed, not left to others to implement.

UBC calls for this transport corridor to be realigned away from the habitat trees used by black cockatoo species, to truly avoid the harm to these endangered or vulnerable species. In the absence of such a recommendation, conditions need to be developed that support the black cockatoo populations that frequent this area.

We note that the offsets proposed are far from the Development Envelope. Is there any evidence available that shows this population would make use of the offset sites proposed?

## **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 will be difficult to restore once degraded.

UBC calls for every care to be taken in ensuring that the ecological and hydrological integrity of inland waters are maintained. This includes avoiding vegetation clearing near wetland buffers and water-dependent ecosystems and committing to "no net change" in hydrological balance.

## 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. The CIA chapter does not explicitly list or quantify cumulative impacts from other developments east of Kwinana Freeway such as industrial expansions, urban infill, or other major infrastructure. It also makes no reference to the Latitude 32 project which abuts Anketell Road and proposes to clear 20 hectares of native vegetation.

We also believe that proposals related to Westport or the Outer Harbour projects should be considering cumulative impacts across all associated Westport-area developments, including freight corridor and port-relevant works in the broader region east of the freeway.

We therefore believe there has been insufficient recognition in these documents of the cumulative impact of habitat and species loss.

## There is no true avoidance in the proposal

Many of the claims in the review documents around 'avoid' are considered by the conservation community to be 'minimisation' and to focus on that and offsetting. If true 'avoidance' was in play, there would be more focus on completely avoiding impacts to threatened ecological communities, critical black cockatoo habitat, and sensitive hydrology. This would of course require a substantially different route selection and advanced ecological infrastructure. There is no reference to the exploration of alternatives through cleared or degraded land, nor novel engineering solutions that are nature friendly. Surely there are opportunities to deliver critical infrastructure through smarter and lower impact planning that optimises for environmental resilience and multi-functional corridors.

## Offsets

The offset strategy is inadequate to protect the threatened species at risk from this project. Furthermore, the management support for The Spectacles should not be dependent on offsets. This is a Bush Forever site, with an active Friends groups committed to its care and should be managed well by its land manager without having to rely on offset funding.

The offsets strategy appears to rely heavily on sites located far from the impact area and within already fragmented landscapes. Those far away sites will be of limited foraging, roosting and breeding benefit to black cockatoos who frequent this part of the Swan Coastal Plain. Offsets should be local, in-kind, and secured through binding management agreements. Furthermore, the focus on revegetation and restoration, although worthy, does nothing for filling the feed gap for these black cockatoos who lose foraging habit.

We question why these offsets have been chosen. Offsets that are closer, ecologically equivalent, and rich in Black Cockatoo habitat value will deliver far stronger conservation outcomes for the impacted populations. Aligning offset locations with areas already used or needed by local cockatoo flocks increases effectiveness and resilience. Furthermore, offsets that support connectivity between retained remnant vegetation east of Kwinana will facilitate species resilience.

Furthermore, it is of great concern that the proponent can deem that the clearing of native vegetation is 'not significant' thereby not triggering an offset calculation. Much of the native vegetation in the area has been assessed as good - to very good condition. All lost native vegetation is worthy of being offset.

## Conclusion

UBC calls for a design that is stronger in the environmental principle '**avoid**' and shows more than token respect for remnant vegetation, TECs and threatened fauna reliant on that bush. Better avoidance strategies will benefit both the natural environment and the proponent's social licence to operate. UBC believes that the **balance** between infrastructure development and protecting the environment has not been struck appropriately, in what appears to be an old-fashioned approach to a wicked problem.

We need to be delivering infrastructure needs for the future while having a great regard for **intergenerational equity**, one of the guiding principles of the EP Act.

UBC reminds the EPA that every development that destroys foraging, roosting or breeding trees used by **black cockatoos** is another step towards their extinction. The cumulative pressures on our threatened fauna are already too high.

Should the proposal be recommended by the EPA, UBC requests that due attention is paid to the recovery plans (or equivalent) for **TECs and threatened species** and included in the conditions.

Furthermore, should the project be recommended and **offsets** be identified, then UBC request that they provide ecological services close to the harm anticipated from the project.

Thank you for the opportunity to comment.

Chairperson

[christine.richardson@bushlandperth.org.au](mailto:christine.richardson@bushlandperth.org.au)

**Urban Bushland Council WA Inc**

City West Lotteries House

2 Delhi Street

West Perth WA 6005

[ubc@bushlandperth.org.au](mailto:ubc@bushlandperth.org.au)

[www.bushlandperth.org.au](http://www.bushlandperth.org.au)