

Reid Highway/Erindale Road Grade Separation.
EPBC Number: 2026/10485

Make comment EPBC Act Public Portal on preliminary concept.

The Urban Bushland Council WA Inc believe that the Mainroads proposal for Reid Highway/Erindale Road Grade Separation is a controlled action and requires a formal assessment.

Mainroads states that it 'is referring the proposed action to DCCEEW as **the action is likely to have a significant impact on several listed MNES** under the EPBC Act 1999.' (UBC emphasis)

The Urban Bushland Council WA Inc appreciates Mainroads' advice that the intersection of Reid Highway and Erindale Road '*carries approximately 83,000 vehicles a day*' and '*currently ranks first in the Perth metropolitan area for both crash numbers and cost of congestion...*'

However, the UBC cannot agree that the Mainroads proposal to 'fix' these problems is suitable because it comes at the expense of endangered species and communities - '**part of the remaining native vegetation of the Swan Coastal Plain**'. (Mainroads referral: UBC emphasis)

The UBC notes the advice given by Mainroads:

'The project will: significantly improve the daily commutes for residents in Balcatta, Hamersley, Warwick, and other northern suburbs, by easing congestion and delivering safer, more efficient roads.' The UBC's suggestion for Mainroads possible consideration is to conduct an advertising campaign to encourage people onto the trains. The concept of induced demand is well known – if you build more roads, you get more cars.

Clearing continues to be approved whether it be for roads, minerals, sand and limestone extraction, housing, industry, agriculture....that cumulatively is of such significance that communities, plants and animals are facing extinction. Wetlands continue to be filled and buffers reduced. Even in 'constrained areas' protection of plants and animals at risk must be given a chance of at least persisting into the future.

As the referral document states at 3.1.3:

'The proposed action contains areas of threatened ecological communities (TECs) including:

- *Banksia Woodlands of the Swan Coastal Plain (listed as Endangered under the EPBC Act). Impacts include 'consideration of extent, condition and fragmentation'.*
- *Tuart (Eucalyptus gomphocephala) Woodlands and Forests of the Swan Coastal Plain (listed as Critically Endangered under the EPBC Act)'*

...and:

'The PAA also provides habitat for EPBC-listed Threatened Species, including:

- *Carnaby's Black-Cockatoo (Zanda latirostris) – Endangered (EPBC Act). Black cockatoo impacts include 'clearing, breeding habitat and fragmentation'.*
- *Forest Red-tailed Black-Cockatoo (Calyporhynchus banksia naso) – Vulnerable (EPBC Act)*

This habitat that would be lost, is foraging and potential breeding habitat within the remnant vegetation.

The proposed clearing is 35.55ha of native vegetation but 'less than 13.9 ha is considered to be in 'Good or better condition.' Because of the loss of native vegetation over Perth and Peel and where black cockatoos lived, all native vegetation must be considered as important.

The following is the amount of clearing proposed as outlined in the Referral document:

- 11.71 ha of Banksia Woodlands of the Swan Coastal Plain (Endangered)
- 13.52 ha of Tuart Woodlands and Forest TEC (Critically Endangered)
- 18.00 ha of Carnaby's Cockatoo foraging habitat (or 19.22ha stated in the Supporting Referral document)
- 1.86 ha of Red-tailed Cockatoo foraging habitat.

Urban Bushland Council comment follows on the two listed communities and the two species of black cockatoo.

BANKSIA WOODLANDS OF THE SCP

'Threatened Ecological communities are those at risk of being degraded to the point of collapse'.¹

The Banksia Woodland community is a Threatened Ecological Community, listed as endangered - that is - in danger of extinction - under the Environmental Protection and Biodiversity Conservation Act 1999.

*'The conservation objective for this community is to mitigate the risk of extinction, and help recover its biodiversity and function...'*²

The Conservation Advice follows with the three key approaches:

- 'PROTECT the ecological community to prevent further loss of extent and condition;
- RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives;
- COMMUNICATE WITH AND SUPPORT researchers etc....'

The Report states '*Actions inconsistent with these recommendations that are likely to significantly affect the ecological community should not be undertaken*'. (p 33, ibid UBC emphasis)

TUART WOODLANDS AND FORESTS OF THE SWAN COASTAL PLAIN:

The Tuart Woodlands and Forests of the Swan Coastal Plain is listed as Critically Endangered and is 'a nationally significant ecological community.' **'The ecological community is likely to be completely lost if it is not protected and restored'**. (p4 Tuart Woodlands and Forests of the SCP: Dept of the Environment and Energy)

Tuarts are one of the Earth's rarest trees (p11: Irene Cunningham '*The Trees that were Nature's Gift*')

Tuart trees are only found on the Swan Coastal Plain and have experienced an 80 - 86% loss. (2019 DCCEEW.gov.au National Threatened Species Scientific Committee).

CARNABY'S COCKATOO FORAGING HABITAT

There is 18.6 ha of Carnaby's Cockatoo foraging habitat within the ground disturbance footprint - 3.42ha of 'high' and 14.58 ha of 'moderate to high' quality foraging habitat. All remaining Carnaby's foraging habitat is important.

Great Cockey Count 2025

Of the 2025 Great Cockey Count (6 April 2025), the figure of 15,786 White-tailed Black-Cockatoos recorded (with 6,298 individual recorded on the Swan Coastal plain), '*was the lowest recorded*

¹ Office of the Auditor General 'Audit – Conservation of TECs' 26 January 2025.

² p 33 Approved Conservation Advice for the Banksia Woodlands of the Swan Coastal Plain ecological community.

total number of white tails since 2015, as well as the lowest recorded count for the Perth-Peel Coastal Plain....since 2015'. (Birdlife WA Cocky Notes Issue 38: Spring 2025.)

'...the low numbers recorded this year, [2025] particularly for the White-tailed Black-cockatoos, is concerning.'

This analysis has also been reported by Professor Kris Warren and team, School of Veterinary Medicine, Murdoch University:

'The lower numbers are likely in part a direct measure of real population decline, following both a widely acknowledged poor breeding season, and an unknown amount of adult mortality due to starvation, as evidenced by Carnaby's admitted to Perth Zoo in poor body condition between July and October.'

Professor Warren's Research on Carnaby's Cockatoo shows *'a marked decline in population numbers. The result corresponds with the decline in foraging food, water, and roosting sources, as well as the increase in urbanisation'*. (Long May They Grace Our Skies: Black Cockatoo Research and Conservation. Talk at Naturalists Club 30 September 2025)

The following quotes are from the same presentation.

'Suburbs such as Clarkson, Butler, Alkimos have virtually no remnant bushland and there are no cockatoos there as the satellite tracking shows. There is a need to retain bushland areas + corridors+ Public Open Space with habitat trees'

'Carnaby's are long-lived birds with few young so every loss is important.'

'A key message is that we must not lose any more Carnaby's habitat, and we must increase habitat trees in urban areas and in the south west region'

'Even when Carnaby's are feeding on pine seeds or canola, they never use only these foods. They need to feed on native vegetation for the protein. If feeding on canola the cockatoos need twice as long feeding in native vegetation'. (Professor Kris Warren, Murdoch University talk for Urban Bushland Council's AGM March 2023)

The UBC does not agree that an Offset Strategy and mitigation will counteract the loss of habitat.

RED-TAILED BLACK COCKATOO FORAGING HABITAT

There is 1.86 ha of 'moderate to high-quality' Red-tail foraging habitat.

FRTBC 'have declined in range by 30% as a result of habitat loss and have suffered a marked decline in population numbers since the 1950s. (Johnstone et al. 2013).

Well known threatening process *'are exacerbated by the rapidly increasing urban and industrial development in the Perth and Peel regions and the south-west of Western Australia'*. (DEC 2012).

'Any loss of foraging areas in the Perth-Peel area would not support recovery of black cockatoos and instead would be likely to exacerbate the decline.' (Pers comment –13 March 2026: Bec Donaldson, Conservation Medicine Program Murdoch University)

Because 'There are 20 recorded roosts for Carnaby's Black-Cockatoo and Forest Red-tailed Black Cockatoo in the Study Area, the loss of foraging habitat would be significant. Flocks of Carnaby's Cockatoos have been seen feeding over the Erindale Bushland site.

Potential Breeding Trees.

When reviewed there were 587 potential breeding trees (with a diameter of > 500 mm) within the PAA. The UBC understands from a federal DCCEEW officer that trees with a DCH of 300mm and greater are considered potential breeding trees.

Whether trees are currently not breeding trees as informed by Peter Mawson/Rick Dawson is not the issue. Trees with a DCH of 300mm or greater are considered potential breeding trees. Red-tailed Black Cockatoos are now breeding on the Swan Coastal Plain. The population of Red-tailed Cockatoos has changed so much since around 2010 and is still changing. This writer has observed the fledging of three Red-tailed Cockatoo fledglings at Perry Lakes, Floreat. The three fledging dates were 17 August 2021, 12 December 2024 and 9 January 2026 all from the same natural hollow in a Eucalyptus rudis. The UBC disagrees with Rick Dawson (p 26 Supporting Referral Document) where he states '*...it is highly unlikely that the native eucalypts within the PAA would be used for breeding by Forest Red-tailed Black-Cockatoos.*'

Vegetation complexes within the proposal area.

There is a discrepancy between figures provided in the Supporting Referral Document (page 16 - Table 5) and advice received by the EPA's 'Perth and Peel at 3.5 Million'- July 2015'. Mainroads figures are over a greater area than the EPA's Perth and Peel but the EPA's figures are an indication of cumulative loss through clearing.

Vegetation Complex	% remaining Mainroads	EPA 2015- Secure for conservation (%) Perth and Peel
Herdsmen Complex	30.45	13.2
Karrakatta Complex – Central and South	22.50	1.8

Fragmentation

If the proposal were to proceed further fragmentation would obviously occur. Therefore we disagree that '*...given that the linkages within the PAA are already highly fragmented and do not currently function as continuous corridors, the Proposed Action is unlikely to result in a measurable reduction in landscape-scale ecological connectivity beyond existing conditions*'. (p28 Supporting Referral document)