**Reid Highway / Erindale Road Grade Separation**
**Seven-day referral comment – October 2026**

**Requested level of assessment: Assess – Public Environmental Review (PER)**

The Urban Bushland Council WA (UBC) requests that the Environmental Protection Authority assess this proposal through a **Public Environmental Review (PER)**. The scale of native vegetation loss; the impacts on endangered ecological communities and fauna; unresolved cumulative impacts and absence of a developed offset strategy warrant comprehensive assessment and meaningful public consultation.

UBC recognises the objectives of improving road safety and traffic efficiency. We note that the Environmental Review Document (ERD) acknowledges that alternative interchange configurations could reduce the disturbance footprint. Their rejection on transport grounds does not adequately demonstrate that environmental avoidance has been maximised. The community is entitled to more information about the scenarios that were tested.

The ERD proposes clearing up to 28.64 hectares of native vegetation, including 11.71 hectares of Banksia Woodland and 9.41 hectares of Tuart Woodlands & Forests of the Swan Coastal Plain. The latter is a Critically Endangered threatened ecological community. The proposal also affects 18 hectares of Carnaby's Black-Cockatoo foraging habitat and threatens 446 potential breeding-sized trees, including hollow-bearing trees.

UBC requests that the EPA require Main Roads to develop a design alternative the completely avoids additional Tuart clearing and transparently evaluate it through the PER.

This would demonstrate whether avoidance has been pursued to the maximum practicable extent before minimisation or offsets are considered.

The ERD identifies potential cumulative losses of approximately 1,716 *Jacksonia sericea* plants from the interchange and adjoining Hamersley residential proposal—approximately 43% of the known local population. Although listed as Priority 4 in Western Australia, this species is assessed as Endangered by the IUCN. *Jacksonia sericea* also supports specialist native pollinators, including the bee *Leioproctus zephyr*. The implications of vegetation clearing for these ecological relationships require further investigation, including targeted native-bee surveys.

We note the proximity to the Erindale Road Bushland, which is also undergoing EPA assessment. A PER must assess both cumulative clearing and potential indirect impacts on that site, including changes to vegetation condition, floristic composition, habitat connectivity and ecological integrity. If this proposal is recommended to proceed as currently planned, there will be loss of ecological stepping stones of native vegetation. If both proposals proceed then there will be a calamitous impact on ecological connectivity.

The ERD acknowledges that Main Roads' environmental offset strategy remains under development. UBC requests explicit investigation of opportunities to secure permanent protection of all of Erindale Road Bushland, including its *Jacksonia sericea* populations. Any offsets must deliver additional, enforceable conservation benefits, not facilitate further clearing or substitute for avoidance.

A PER would allow the community and independent experts to scrutinise avoidance alternatives, cumulative ecological impacts and proposed offsets before decisions become irreversible. The Commonwealth's Controlled Action assessment through Preliminary Documentation should not replace comprehensive State assessment.

**UBC strongly recommends Assess – Public Environmental Review**, with avoidance, protection of endangered biodiversity and transparent public participation at the centre of the assessment.

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