



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

10 November 2021

Department of Water and Environmental Regulation
Prime House
8 Davidson Terrace
Joondalup WA 6027

Re: **CPS 9448/1 Main Roads Western Australia**

The Wildflower Society of WA (WSWA) recommends to the Department of Water and Environmental Regulation (DWER) that Clearing Permit application (CPS 9441/1), submitted by Main Roads Western Australia (MRWA) with regards to the Great Eastern Highway Bypass (GEHB) Interchange Project, be rejected. WSWA has concerns with the lack of details of the proposed project design, the lack of alternative design options including alignment, and lack of details on proposed offsets for the notable residual impacts.

Proposed project design and alignment

The documentation for the single proposed design and alignment provide no specific detail on the vegetation to be cleared. MRWA is applying for a permit to clear the entirety of the development envelope while stating they will refine the design and the exact area to be cleared at a later date, presumably after a clearing permit has been granted. Such an approach is disingenuous, since there will be no recourse over MRWA to reduce impacts to vegetation once such a permit is granted. Further, a lack of such detail makes the assessment of residual impacts and associated offsets (see below) impossible. The WSWA strongly recommends to DWER that MRWA supplies detailed plans of the proposed design and alignment as well as revised associated impacts on flora and vegetation.

Alternative designs and alignments

MRWA has provided a single design and alignment option for the interchange. It is unclear from the application why these were chosen (i.e. cost, safety and or minimizing clearing). MRWA states in the Supporting Document: Proposal overview and potential impacts, that "Historical land use planning constrains Main Roads to undertaking works within the existing road reserve". This is untrue since MRWA can acquire privately owned land under the *Land Administration Act 1997*. Indeed, it seems that MRWA will have to acquire Lot 2 Lakes Road as part of the proposed works. The WSWA strongly recommends to DWER that alternative designs and alignments along with the associated impacts on flora and vegetation for each, be supplied by MRWA, including those requiring the acquisition of land. For example, acquiring land immediately to the north of the Bypass and shifting the interchange further north would notably reduce clearing of the large vegetation remnant south of the bypass. As another example, a trumpet design has been assessed as the most appropriate but a directional T/full Y interchange could also be appropriate and require less clearing, as would a design utilising elevated ramps.

Offsets

MRWA notes that the proposal is at variance with five of the ten clearing principles. As such, extensive offsets need to be offered but no details of these are given in the supporting documentation, only that "Main Roads will continue to work with DWER to identify a suitable offset package required to counterbalance significant residual impacts to State listed Threatened Ecological Communities and



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Black Cockatoo habitat". We note that this statement does not acknowledge that a Federally listed Threatened Ecological Community and Threatened Species will be impacted and hence, require additional offsets. Once the details of project designs and alignments, and associated vegetation clearing are supplied, a thorough offset plan must be made so that it can be publically assessed. This is especially so given the small amount of comparable vegetation on the Swan Coastal Plain that could be used for offsets.

Conclusions

The WSWA recommends that the clearing permit application by MRWA be rejected due to:

- The lack of detail of the proposed design and alignment, and the ensuing lack of specific details on impacts on flora and vegetation from associated clearing;
- A lack of alternative design and alignment options put before DWER for assessment;
- The failure to provide advice from the Federal Department of Agriculture, Water and Environment regarding their approval and offset requirements associated with the proposed clearing; and
- The lack of details on offsets which will necessarily be required due to the significant residual impacts of any clearing in the proposal area.

In conclusion, WSWA believes this application is too premature within the project planning and design cycle and the granting of a clearing permit on the basis of the information provided will not allow for public consultation on the design configurations considered during project development or on the offset package proposed to compensate the loss of vegetation or impacts on threatened species.



<http://www.wildflowersocietywa.org.au/>

References

Biota Environmental Sciences (2021). Great Eastern Highway Bypass Intewrchanges (Roe Highway and Abernethy Road) Biological Survey. Prepared for Main Roads Western Australia, April 2021.

Environmental Protection Authority (2016). Technical Guidance - Flora and Vegetation Surveys for Environmental Impact Assessment.



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Greater Connect Alliance (2021). Great Eastern Highway Bypass Interchanges Native Vegetation Clearing Permit – Supporting Document. Document Number GEHBI-GCA-RPT-A000-EN-00004 Rev.0. Prepared for Main Roads Western Australia, 5 October 2021.