

16 July 2024

Department of Climate Change, Energy, the Environment and Water (DCCEEW)

EPBC Act Public Portal

Re: EPBC Number: 2024/09841 – Anketell Road Upgrade (Leith Road to Kwinana Freeway)

The Wildflower Society of Western Australia (hereafter referred to as ‘the Society’) considers the proposed Anketell Road Upgrade is a “controlled action” as it will have an impact on at least three protected matters. A “controlled action” is defined under the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act) as an action that the Minister decides has, will have, or is likely to have, a significant impact on a protected matter. The Society believes the impact of the protected matters is avoidable as the proponent has not taken all the potential options to provide the stated purpose of the road upgrade into account. The Society also questions the need for the road upgrade, given that the primary need for the road, the Westport development, has not yet been assessed and no timeline for its development has yet been finalised.

The Society has identified that implementation of the proposal would have a direct significant impact on the following matters of National Environmental Significance relating to Threatened Ecological Communities:

- Banksia Woodland of the Swan Coastal Plain which is ‘endangered’ and subject to a loss of up to 14.26 ha of woodland of ‘good’ condition or better.
- Tuart Woodland and Forest of the Swan Coastal Plain which is ‘critically endangered’ and subject to a loss of up to 41.65 ha of woodland of a range of quality. Importantly, even those patches considered cleared have large trees which could be potential breeding sites for Black Cockatoos.
- The Melaleuca shrublands on limestone ridges which is classified as ‘critically endangered’ and although there is only 1.96 ha proposed for clearing, the overall total area of this TEC remaining is reduced to isolated patches which are vulnerable to disturbances such as fire. Patches as small as 0.01ha are considered worthy of conservation.

While the Society does not consider conservation of fauna as part of its objectives protection of habitat is of interest to it. The Society notes the loss of up to 16.11 ha of core foraging habitat for the Carnaby’s Cockatoo and an additional 41.75 ha of secondary foraging habitat. Further loss of habitat for the Forest Red-tailed Black Cockatoo (FRTBC) includes 7.24 ha of core foraging habitat and 31.5 ha of secondary foraging habitat. In addition, the vegetation along Anketell Road provides a flight corridor for the movement of FRTBC and their fledglings to feeding areas in the Melaleuca shrublands and Banksia woodlands which abut the project area.

In the documentation to support the project advice, the Society notes that there is no consideration of the cumulative impacts of proposed developments locally or regionally on the Threatened Ecological Communities or the threatened fauna. Significant clearing is occurring in the areas immediately north of Anketell Road associated with residential development and this is having a significant impact on the Banksia Woodland in the area.

The Society notes that the Biota reports discuss the impact of reduction of the of patch sizes and the increase of edge/area ratios on the remnants in the area. Both these changes will impact of the viability of each patch and their vulnerability to disturbance during project construction and

operation. Site inspections in the area point to the potential for invasion of weeds the seed of which is mobilised by the air disturbance of large trucks.

The conservation advice for each TEC points to the risk of extinction and the need to retain the existing occurrences of the communities. Any loss of area, as proposed in this project proposal is counter to the objectives of their listing. To not determine this project is a controlled action and permit its implementation would continue the pattern of 'death by a thousand cuts' that has resulted in these communities being threatened in the first place.

In addition, the Bush Forever sites in the project area were established in the planning system in 2010 to set aside areas of bushland to retain representation of vegetation types throughout the metropolitan area of the Swan Coastal Plain. That the road planners and designers have taken licence to deplete these sites, that were selected for their condition and composition, and ignoring the purpose of their reservation is of great concern.

Main Roads Western Australia has an opportunity to optimise provision for local light traffic and diverting it away from Anketell Road to Thomas Road and Hope Road to enable the dedication of Anketell Road to heavy vehicles only. This alteration will require some change of habit for local road users while meeting the end objective for Anketell Road. It would avoid the majority of the clearing currently proposed.

The State EPA has recognised the significance of this project and its impact on the environment and has agreed that the highest level of assessment be applied to this project. This indicates the level of concern held within the State of Western Australia about this project and its impact.

The Society understands that a similar level of assessment has been applied to the Westport development and Anketell Road will provide access to that port facility. The Society believes it is premature that the community is being asked to consider the assessment of this project prior to the assessment of the Westport development. We also find the timeframe before the project is needed does not warrant an assessment at this time as it does not allow consideration of changes in the environment that may occur in the interim.

The Society believes this project in its current configuration warrants being called in as a "controlled action". We believe it is poorly conceived and premature and has been developed without significant regard to its impact on the environment.

We look forward to the opportunity to discuss this further with representatives from DCCEEW in the future.



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