



mainroads
WESTERN AUSTRALIA

Enquiries: Bree Atkinson ()
Our Ref: D25#1350043
Your Ref: EPBC 2025/10266

23 February 2026

Kate Hamer
Director
South WA Assessments
Environment Assessments West
Department of Climate Change, Energy, the Environment and Water
John Gorton Building King Edward Terrace
Parkes ACT 2600

Dear Kate

Kwinana Freeway Upgrade (Roe Highway to Mortimer Road) (EPBC 2025/10266) - Request to vary Proposed Action under Section 156 of the EPBC Act.

In September 2025, Main Roads Western Australia (Main Roads) referred the Kwinana Freeway Upgrade (Roe Highway to Mortimer Road) (Proposed Action) to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) (EPBC 2025/10266) for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

On 5 November 2025, it was determined that the Proposed Action (EPBC 2025/10266) was a controlled action, to be assessed by Preliminary Documentation. The relevant Matters of National Environmental Significance (MNES) were listed threatened species and communities (sections 18 and 18A).

On 19 November 2025, DCCEEW requested additional information to support the Preliminary Documentation. Main Roads has undertaken and commissioned further environmental studies to support this request and prepare the Preliminary Documentation.

This variation request under s.156 of the EPBC Act seeks to amend the Proposed Action Area (PAA). Details of the variation to the Proposed Action Area (PAA) are provided below to satisfy Regulation s.95A(2) of the Environment Protection and Biodiversity Conservation Regulations 2000 (Cth).

Reasons for the proposed variation

The proposed variation to increase the area covered by the PAA is required for two reasons, which are:

- Progression of design from concept to more detailed design.
- Inclusion of an area required at the Kwinana freeway, Anketell Road interchange (this area overlaps with the Anketell Road Upgrade project (EPBC 2024/9841) PAA.

Advancement of Design

The PAA was originally developed early in the design process with the design being further refined since the referral was submitted in September 2025. The PAA is within an already constrained urban environment. It includes the existing developed Kwinana Freeway and existing rail infrastructure with limited opportunity to widen towards the median, meaning additional lanes are required to be added to the outer edge of the freeway. Existing infrastructure is being utilised or optimised where possible, such as drainage basins, to minimise MNES impacts, with a large portion of the PAA being within existing cleared areas.

The proposed amendments to the PAA will result in the following beneficial outcomes:

- Inclusion of Freeway widening at the Kwinana Freeway, Anketell interchange
- Increased on and off ramp capacity (storage), accommodating predicted future traffic volumes
- Inclusion of noise walls, reducing the impact of noise to nearby sensitive receptors
- Construction of items such as ramp metering signals in the ultimate design location resulting in the avoidance of sacrificial works.
- Optimisation of the storage capacity of the existing drainage basins to accommodate predicted stormwater flows.

These changes have resulted in a minor net addition to impacts to MNES.

Proposed Action variation

The PAA in the referral was described as comprising a total area of 151.07 hectares (ha), including clearing or disturbance of up to 10.70 ha of native vegetation and 48.70 ha of non-native vegetation. Main Roads proposes to increase the total area of the PAA to 174.53 ha, including clearing or disturbance of up to 13.54 ha of native vegetation and 57.27 ha of non-native vegetation.

Figure 1 shows the September 2025 referral PAA overlayed with the amended PAA.

How the impacts of the proposed variation on MNES compare with those of the Referred Proposed Action

The referral PAA was determined to impact on the following MNES, specifically:

- Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain threatened ecological community (TEC)
- Banksia Woodlands of the Swan Coastal Plain TEC
- Carnaby's Cockatoo (*Zanda latirostris*) foraging habitat
- Forest Red-tailed Black Cockatoo (FRTBC) (*Calyptrorhynchus banksii naso*) foraging habitat

Three survey reports cover the entirety of the proposed amended PAA and have been used to inform the potential impacts. A detailed flora and vegetation assessment was conducted by GHD in 2024 along the Kwinana Freeway in a 285.44 ha survey area, which included the majority of the proposed amended PAA. The northern extent of the PAA, associated with Roe Highway was included within the Contextual Area considered by the survey, which was supplemented by additional surveys completed by GHD also in 2024 along Roe Highway. Biota completed detailed and target flora and vegetation surveys, floristic community type assessment, basic fauna surveys, targeted significant fauna surveys and Black Cockatoo habitat assessments for the Anketell Road Upgrade proposal (EPBC 2024-09841), including the area surrounding the vicinity of the Kwinana Freeway and Anketell Road interchange;

with the results and associated spatial data consolidated into a single report.

The proposed variation to the PAA will result in increased impact of:

- 3.34 ha Banksia Woodlands of the Swan Coastal Plain TEC (0.76 ha completely degraded, 0.26 ha degraded, 1.24 ha good, 0.23 ha very good and 0.86 ha very good to excellent condition)
- 4.97 ha Carnaby's Cockatoo foraging habitat (4.82 ha moderate and 0.15 ha moderate to high foraging habitat quality)
- 3.93 ha FRTBC foraging habitat (2.34 ha low, 1.34 ha low to moderate and 0.25 moderate to high foraging habitat quality).

There are no changes to impacts to the Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain TEC.

A summary of impact change to MNES associated with the proposed variation compared to the referral PAA is provided in Table 1. Figures 1 to 5 show the proposed variation to the PAA impact extents.

Table 1 Impact change to MNES associated with the proposed variation

Element	Referral	Proposed variation	Change
Total Proposed Action Area (ha)	151.07	174.53	23.58
Tuart (<i>Eucalyptus gomphocephala</i>) woodlands and forests of the Swan Coastal Plain TEC (ha)	3.04	3.04	-
Banksia woodlands of the Swan Coastal Plain TEC (ha)	7.24	10.58	3.34
Carnaby's Cockatoo foraging habitat (ha)	16.24	21.21	4.97
FRTBC foraging habitat (ha)	16.24	20.17	3.93
Black Cockatoo suitable DBH trees (no.)	12	16	4
Black Cockatoo suitable DBH trees that contain hollows considered potentially suitable for Black Cockatoo breeding (no.)	0	0	-

Impacts of the Proposed Variation on MNES not considered in the referral of the original Proposed Action

The proposed variation to the PAA will not result in any impacts to additional MNES nor has the magnitude of the impacts changed significantly.

Alternatives, mitigation measures and offsets

Main Roads has minimised impacts as far as reasonably practicable.

The amendment to the Proposed Action is required to meet road safety standards and the upgrade is required to incorporate the already existing freeway which is located in a constrained urban environment surrounded by residential and commercial areas and intersected by railway infrastructure. There are no or very limited opportunities to vary the location of infrastructure within the road reserve.

The majority of the increased impacts to Carnaby's and FRTBC foraging habitat as well as Banksia Woodlands of the Swan Coastal Plain TEC are as a result of the inclusion of the Kwinana Freeway – Anketell Road Interchange which is essential for the efficient operation of the freeway and utilises existing infrastructure where possible. The PAA has been constrained as far as practicable at this location to minimise clearing impacts.

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The increased impact to Banksia Woodlands of the Swan Coastal Plain TEC and moderate quality Carnaby's Black Cockatoo foraging habitat at Rowley Road is a result of widening of the freeway on/off ramps, changes required to the alignment of vertical geometry and repositioning the Principle Shared Path. The PAA has been constrained as far as reasonably practicable at this location and alternative design elements such as the use of retaining walls is proposed to minimise clearing impacts.

Where the Proposed Action has a residual significant impact to MNES that cannot be avoided and/or mitigated, an Offset Strategy will be provided with the Preliminary Documentation.

Summary

The proposed variation to the PAA will result in increased impacts to Banksia Woodlands of the Swan Coastal Plain TEC and Black Cockatoo habitat including foraging habitat and potential BC breeding trees (Suitable DBH trees without hollows). Main Roads has minimised impacts as far as reasonably practicable.

Main Roads will continue to identify and assess opportunities to further reduce its impact on the environment throughout the life of the project.

Yours sincerely



Martine Scheltema
Director Environment and Heritage

Enc:

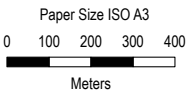
Figures

- Figure 1: Amended Proposed Action Area
- Figure 2: Impact of Amended PAA - Banksia woodlands of the Swan Coastal Plain TEC
- Figure 3: Impact of Amended PAA - Carnaby's Cockatoo Foraging Habitat
- Figure 4: Impact of Amended PAA - Forest Red-Tailed Black Cockatoo Foraging Habitat
- Figure 5: Impact of Amended PAA - Suitable DBH Habitat Trees

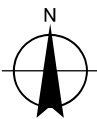
Attachments

- Attachment 1 – Revised PAA shapefile

Figure 1: Amended Proposed Action Area

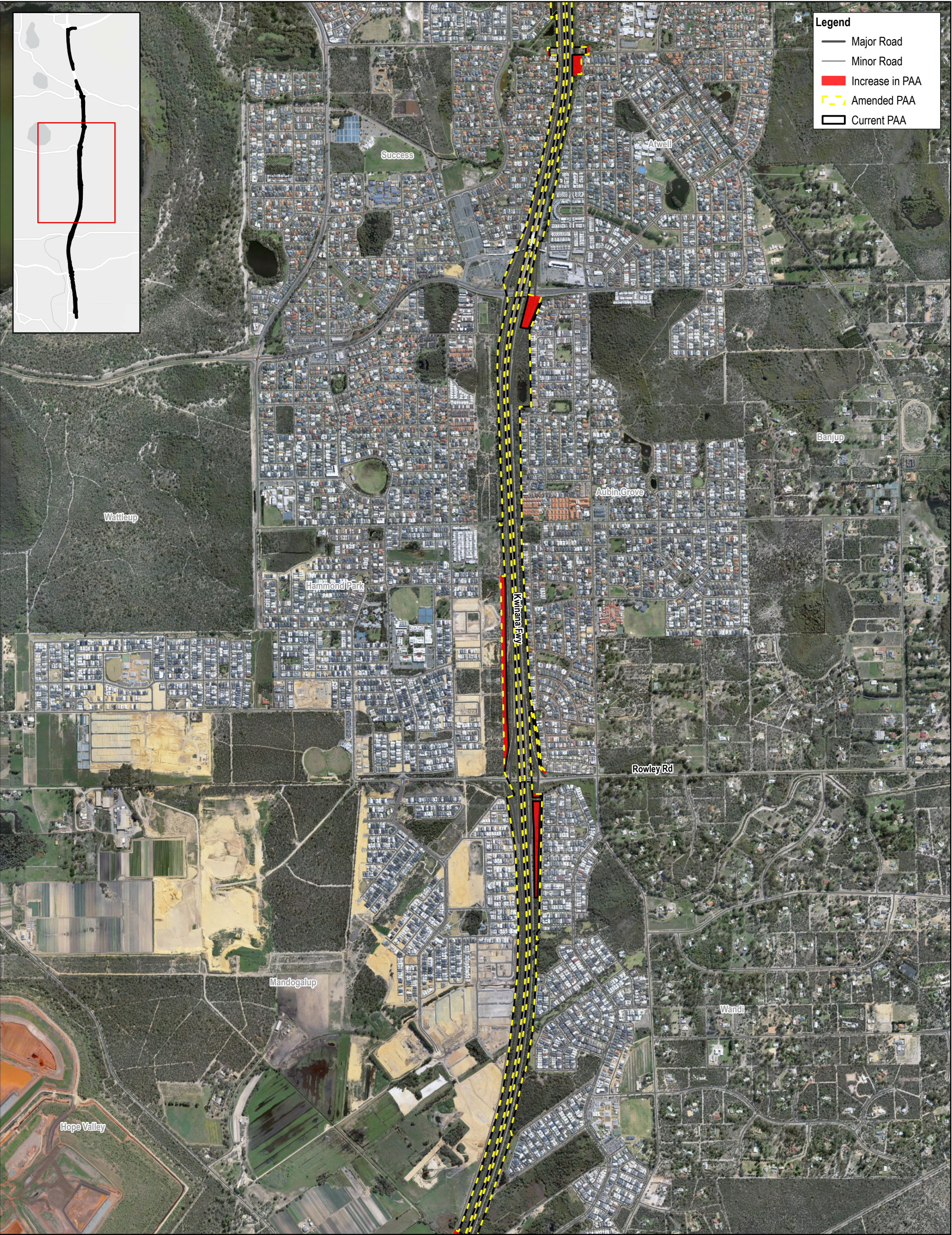


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Kwinana Freeway Upgrade EPBC 2025/10266 s156B

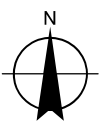
Amended Proposed Action Area (PAA)





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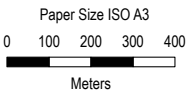
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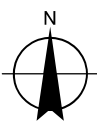
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Amended Proposed Action Area (PAA)

Figure 2: Banksia woodlands of the Swan Coastal Plain TEC



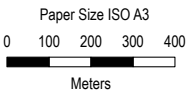
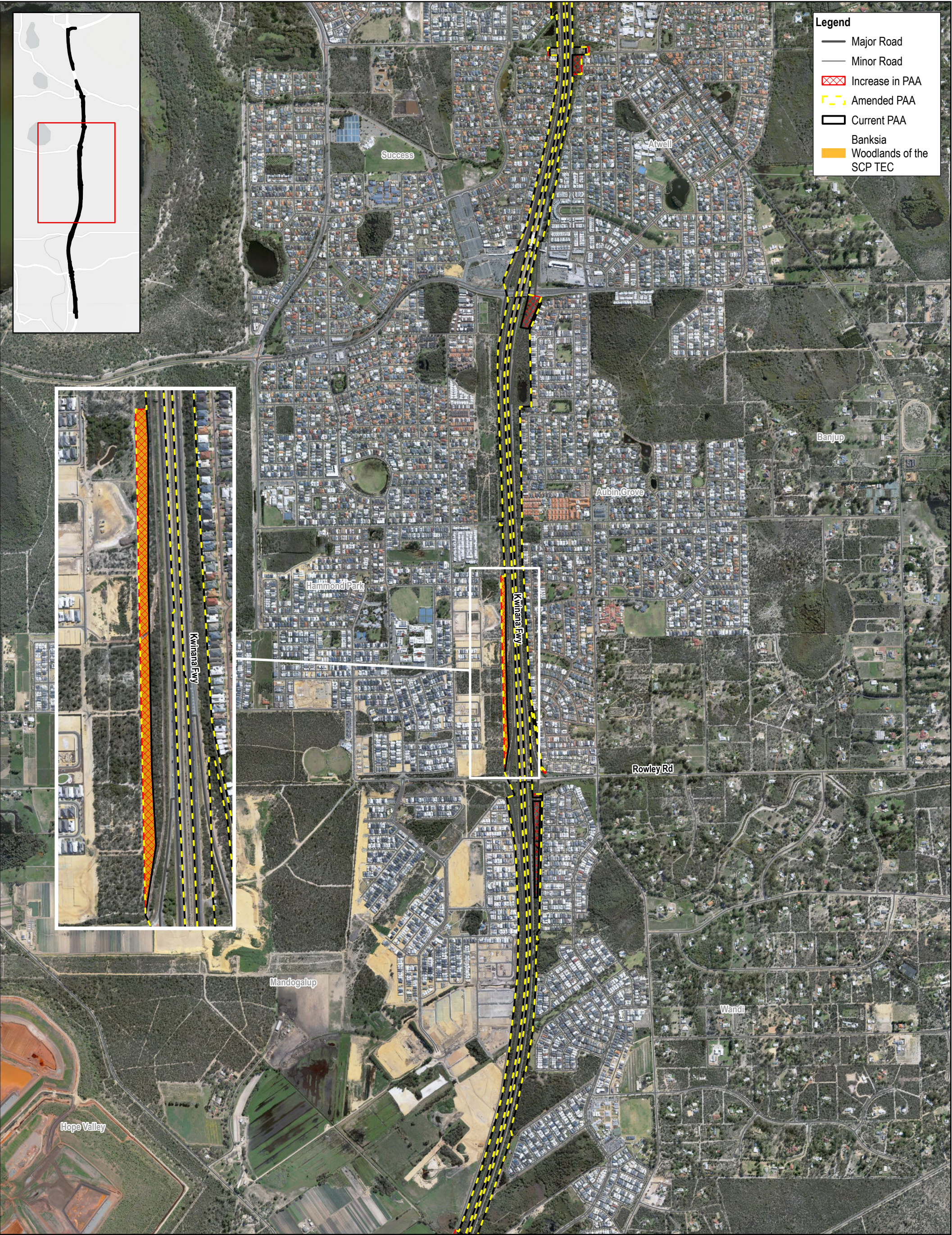
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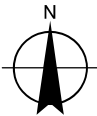
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Impact of Amended PAA - Banksia
woodlands of the Swan Coastal
Plain TEC

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FIGURE 2



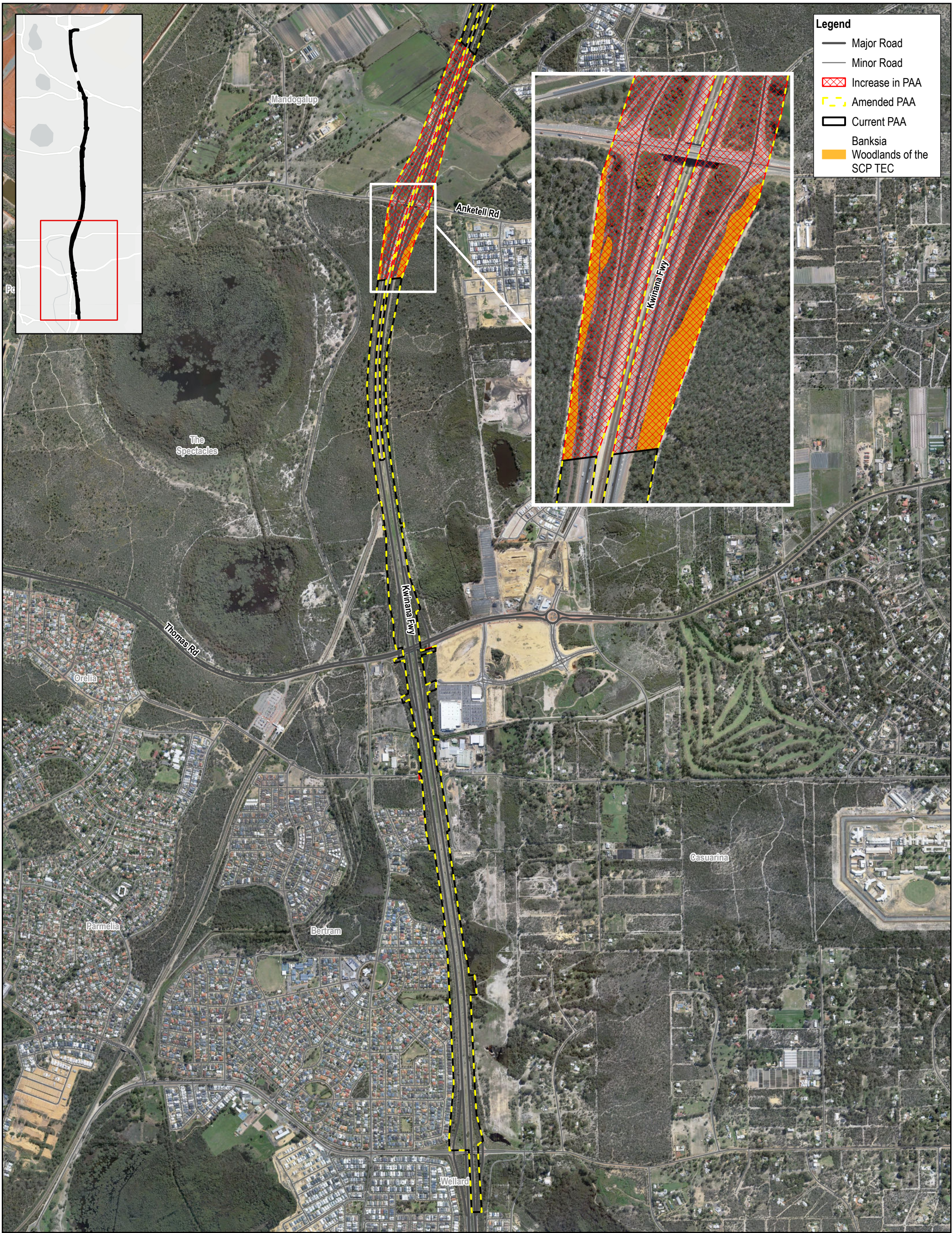
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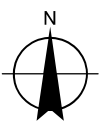
Impact of Amended PAA - Banksia
woodlands of the Swan Coastal
Plain TEC

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FIGURE 2



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Main Roads
Kwinana Freeway Upgrade EPBC 2025/10266 s156B

Impact of Amended PAA - Banksia
woodlands of the Swan Coastal
Plain TEC

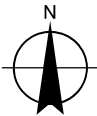
Page 3 of 3
FIGURE 2

Figure 3: Impact of Amended PAA - Carnaby's Cockatoo Foraging Habitat



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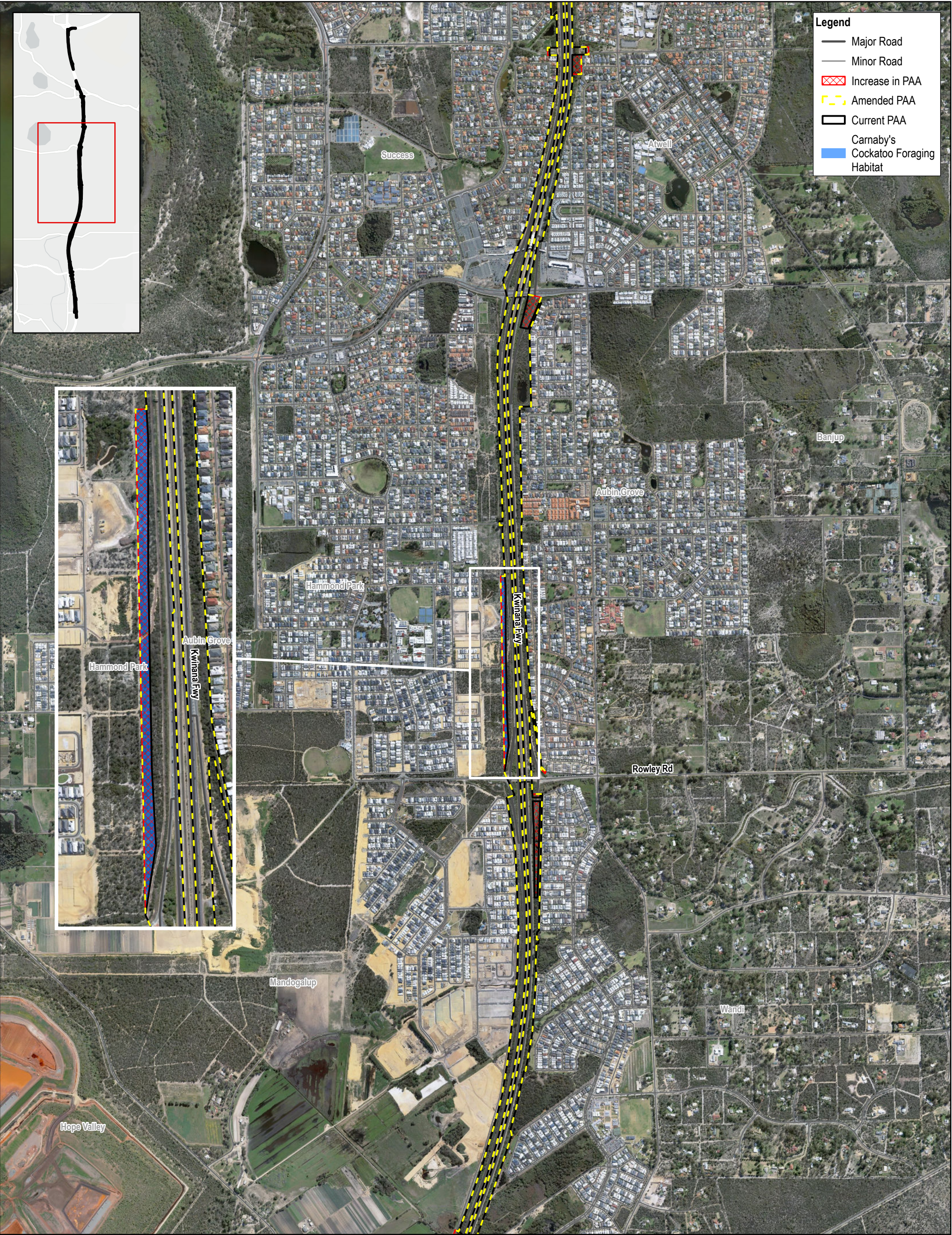
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Kwinana Freeway Upgrade EPBC 2025/10266 s156B

Impact of Amended PAA - Carnaby's
Cockatoo Foraging Habitat

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FIGURE 3



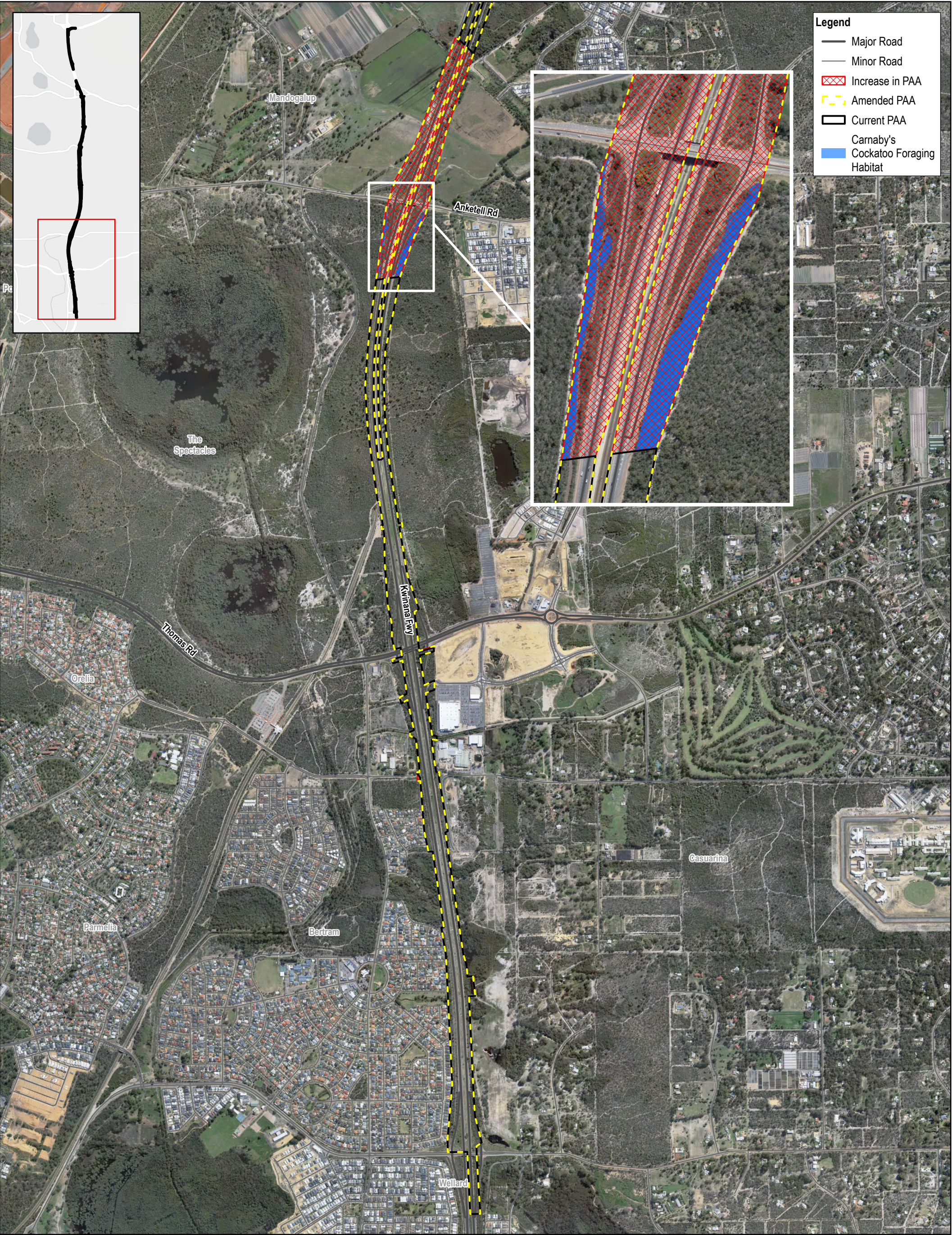
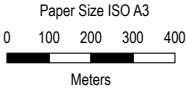
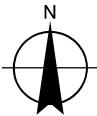


Figure 4: Impact of Amended PAA - Forest Red-Tailed Black Cockatoo Foraging Habitat

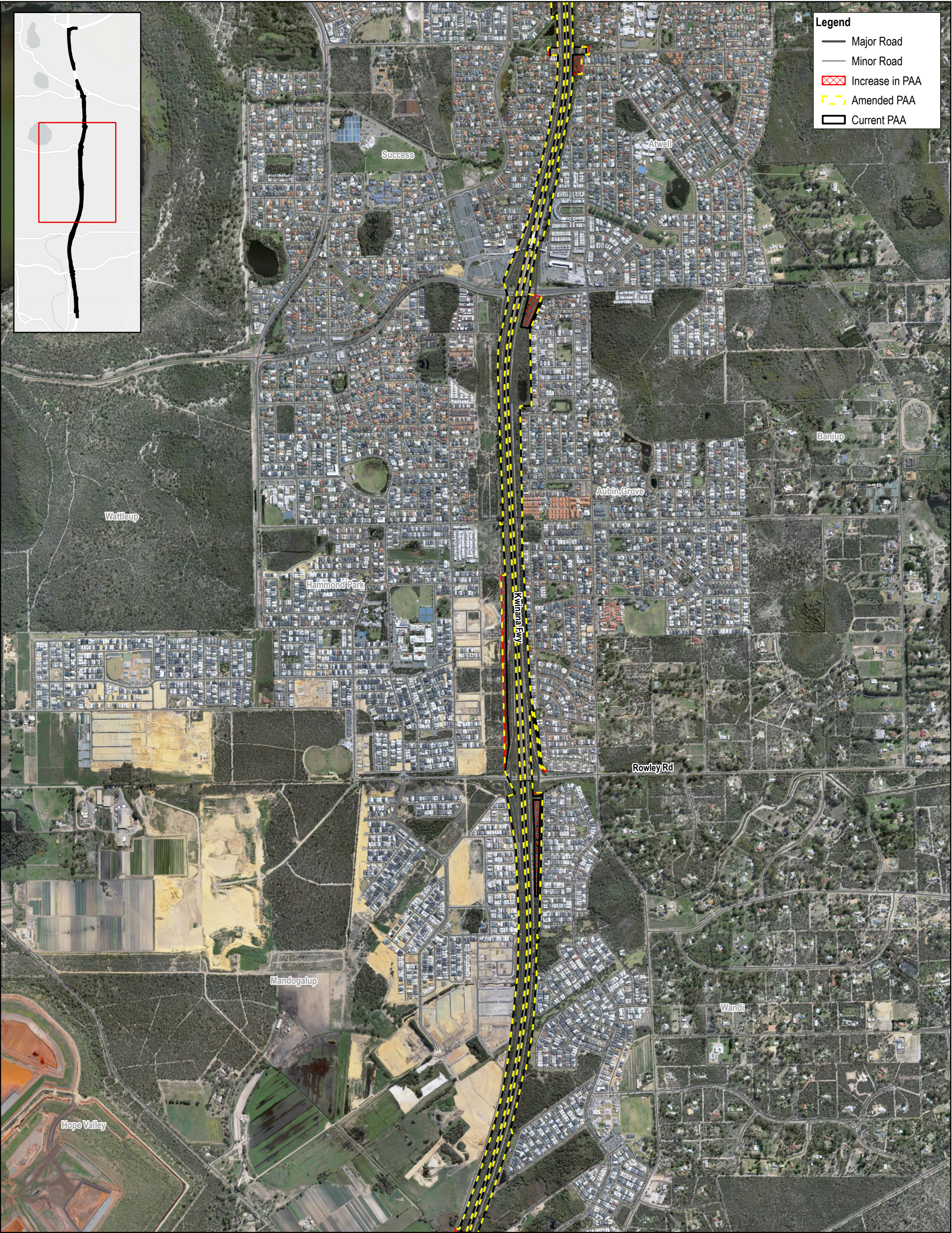


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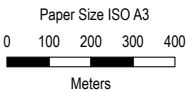
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**Impact of Amended PAA - Forest
Red-Tailed Black Cockatoo Foraging
Habitat**

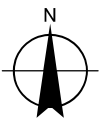


Legend

- Major Road
- Minor Road
- Increase in PAA
- Amended PAA
- Current PAA

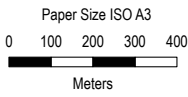
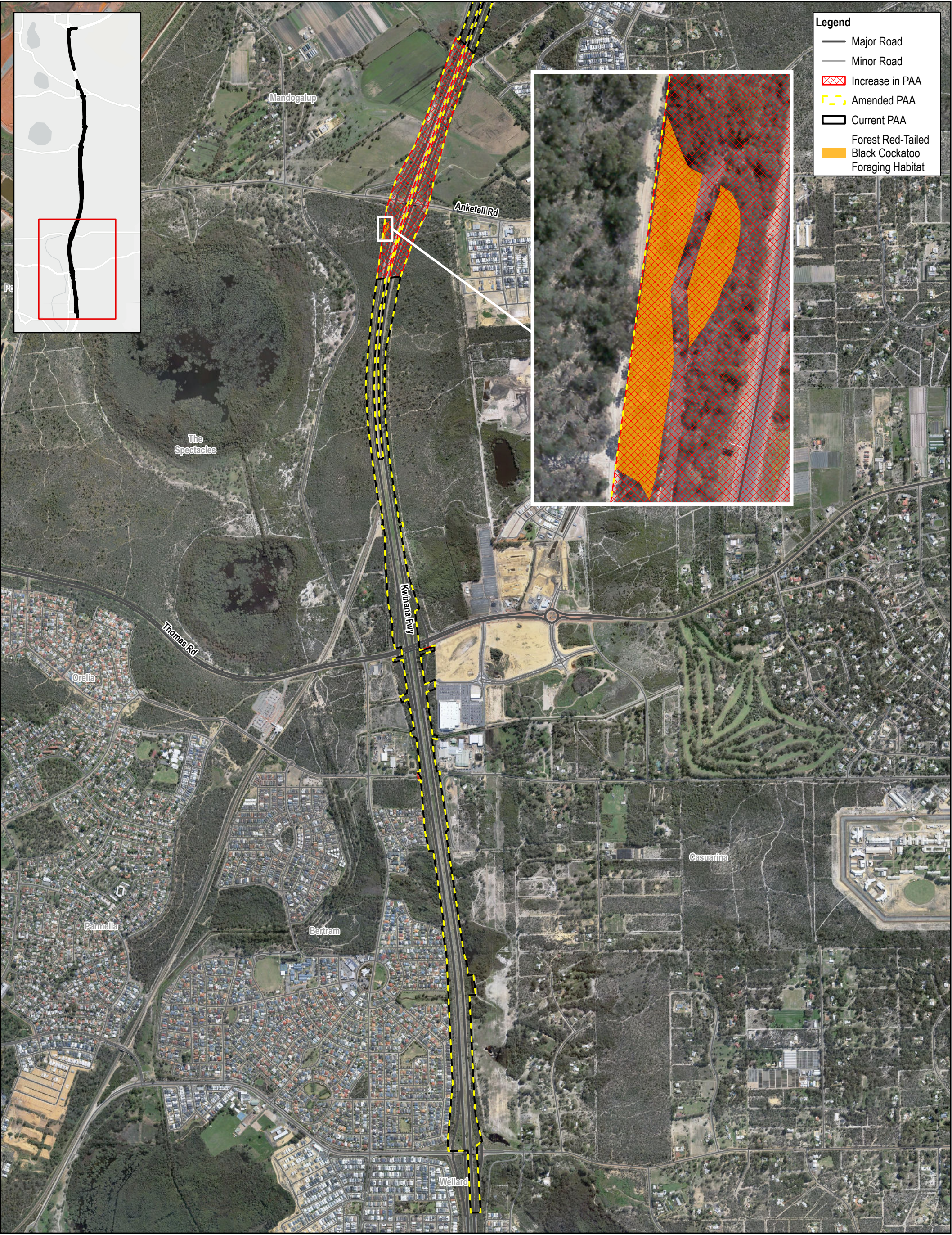


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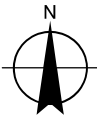


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**Impact of Amended PAA - Forest
Red-Tailed Black Cockatoo Foraging
Habitat**



Map Projection: Transverse Mercator
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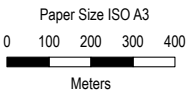


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Kwinana Freeway Upgrade EPBC 2025/10266 s156B

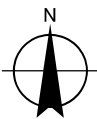
Impact of Amended PAA - Forest
Red-Tailed Black Cockatoo Foraging
Habitat

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FIGURE 4

Figure 5: Impact of Amended PAA - Suitable DBH Habitat Trees



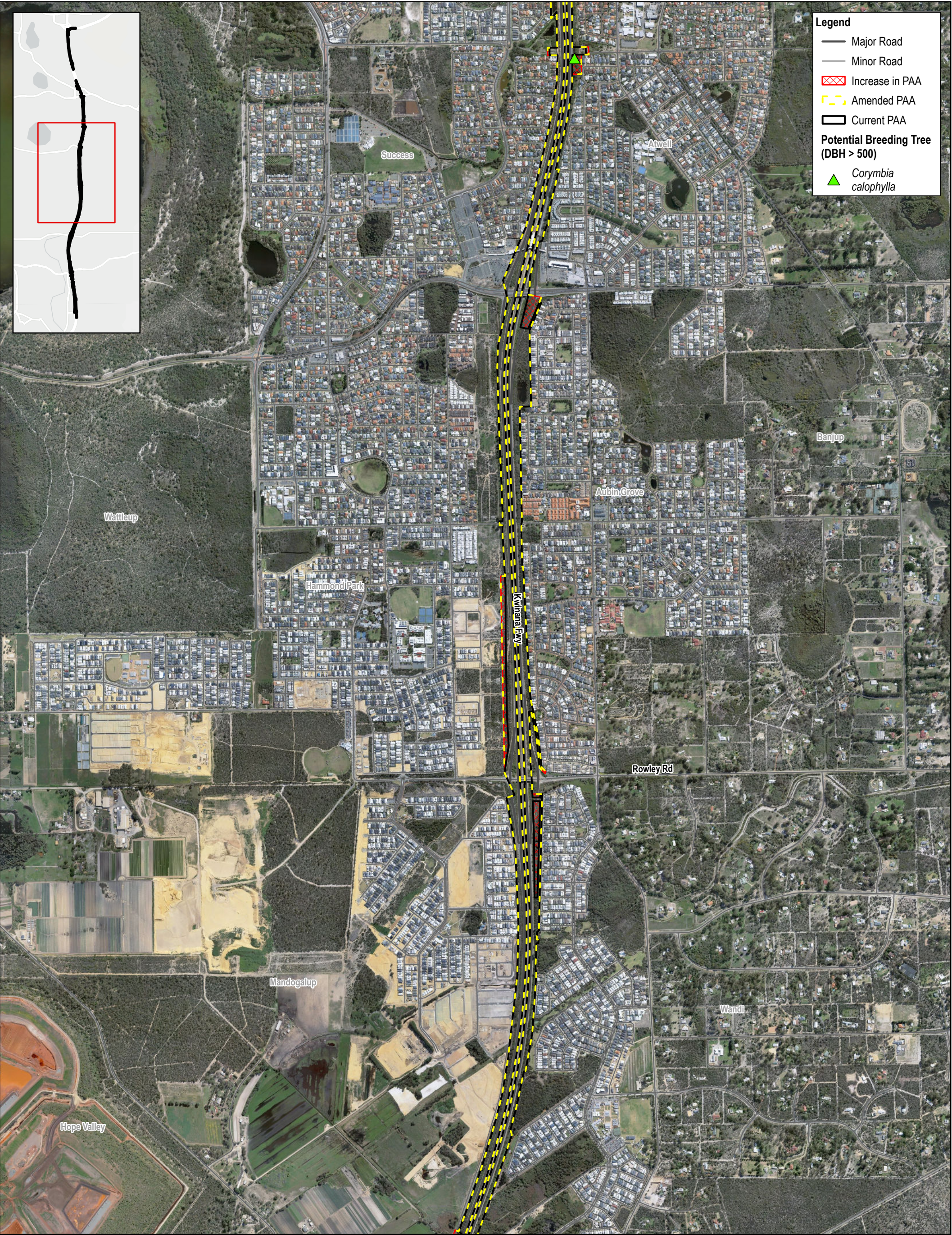
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Main Roads
Kwinana Freeway Upgrade EPBC 2025/10266 s156B

Impact of Amended PAA - Suitable
DBH Habitat Trees

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FIGURE 5

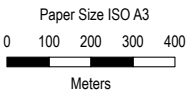


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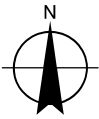
- Major Road
- Minor Road
- Increase in PAA
- Amended PAA
- Current PAA

Potential Breeding Tree (DBH > 500)

- Corymbia calophylla



Map Projection: Transverse Mercator
Horizontal Datum: GDA2020
Grid: GDA2020 MGA Zone 50



Main Roads
Kwinana Freeway Upgrade EPBC 2025/10266 s156B

**Impact of Amended PAA - Suitable
DBH Habitat Trees**



Legend

Major Road

Minor Road

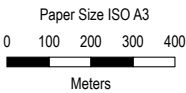
Increase in PAA

Amended PAA

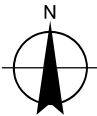
Current PAA

Potential Breeding Tree (DBH > 500)

Eucalyptus marginata



Map Projection: Transverse Mercator
Horizontal Datum: GDA2020
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Impact of Amended PAA - Suitable
DBH Habitat Trees