



**mainroads**  
WESTERN AUSTRALIA

Enquiries: Marni Baetge  
Our Ref: 16/4295  
Your Ref: EPBC 2018/8367

26 March 2020

Declan O'Connor-Cox  
Acting Assistant Secretary, Environmental Approvals Division  
Department of Agriculture, Water and the Environment  
GPO Box 787  
Canberra ACT 2601

Attention: Cassandra Elliott

**Mitchell Freeway Extension and Wanneroo Road Upgrade, Western Australia  
Public Comments on Preliminary Documentation**

Further to the Department's direction to publish dated 23 January 2020, Main Roads Western Australia (Main Roads) has published the preliminary documentation for the Mitchell Freeway Extension and Wanneroo Road Upgrade (EPBC 2018/8367). The preliminary documentation was advertised for public comment in the Wanneroo Times (local newspaper) on 12 February 2020 and The West Australian (State newspaper) on 15 February 2020. The public comment period closed on 1 March 2020. Main Roads received a total of three (3) submissions during the public comment period.

In accordance with the Department's direction to publish, Main Roads provides the following information:

- Appendix A: A summary and response to the public comments received
- Appendix B: A copy of the public comments received.

Main Roads considers that Attachment A adequately addresses the matters raised in the public comments and therefore proposes that no update is required to the preliminary documentation.

Main Roads believes that the information herein is sufficient to enable completion of the Department's assessment of preliminary documentation for EPBC 2018/8367, with the exception of the environmental offsets requirement.

For any queries relating to the response to comments or the preliminary documentation, please contact Marni Baetge on e-mail: [marni.baetge@mainroads.wa.gov.au](mailto:marni.baetge@mainroads.wa.gov.au) or phone: 08 9158 4318.

Sincerely

John Braid  
**Principal Environment Officer**  
**Main Roads Infrastructure Delivery Directorate**



## Appendix A

# Summary and response to public comments on preliminary documentation



**Table 1 Response to comments raised by Quinns Rocks Environment Group**

No.	Comment	Response to Comment
1-1	<p>The Quinns Rocks Environmental Group (QREG) is a local community group promoting conservation and sustainability since 1985. We have advocated to protect habitat and influence planning decisions, run environmental awareness raising activities and undertaken on-ground work including rehabilitation planting, flora and fauna surveys and litter clean ups.</p>	<p>Main Roads has engaged QREG as a stakeholder throughout the development of the proposed action. This has included:</p> <ul style="list-style-type: none"><li>• Invitation to attend a workshop Friday 13 December 2019 presenting the draft Vegetation and Fauna Management Plan (VFMP) and Construction Environmental Management Plan (CEMP) for the proposed action, prepared under Ministerial Statement 629 pursuant to the <i>WA Environmental Protection Act 1986</i>. QREG attended the workshop</li><li>• Request to comment on the draft VFMP and CEMP for the proposed action</li><li>• Incorporation of QREG comments on the draft VFMP and CEMP into the final VFMP and CEMP</li><li>• Provision to QREG of a summary of the response to comments on the draft VFMP</li><li>• Invitation to participate on the proposed action Community Reference Group (CRG). Although QREG declined the invitation Main Roads is keen to continue engaging with QREG on environmental issues specifically related to the proposed action.</li></ul>
1-2	<p>The QREG participated in all public consultation relating to land use changes in the North West corridor (generally the coastal area between Burns Beach and Pipidiny Roads), advocating for better consideration and protection of biodiversity, geo-heritage and more recently the need for consideration of impacts of climate change in decision making. Therefore, it is more than disappointing to see in this corridor the continuation of the development pattern that resulted in loss of biodiversity and landscape values in other parts of the metropolitan region.</p>	<p>The development of the North West corridor was approved as part of the Metropolitan Region Scheme (MRS) through MRS amendment 992/33 Clarkson-Butler in 2003. Development has been on-going in this corridor since then. The proposed action is consistent with MRS amendment 992/33 Clarkson-Butler and forms part of the strategic transport corridor for Perth's northern suburbs.</p> <p>The proposed action will bring a broad range of benefits as identified in Sections 6.4 to 6.6 of the preliminary documentation, including:</p>



No.	Comment	Response to Comment
		<ul style="list-style-type: none"><li>• Reduced travel time, vehicle operating costs and vehicle crashes</li><li>• Support for high density development, investment and connectivity in the northwest suburbs</li><li>• Support for business development and subregional employment self-sufficiency.</li></ul> <p>The proposed action is consistent with the Mitchell Freeway Extension Strategic Business Case (2012) which selected the proposed action (and previous Stage 1 freeway extension) as the preferred option from six options. The analysis of options was undertaken in consultation with a CRG and considered multiple criteria including:</p> <ul style="list-style-type: none"><li>• Access and urban form</li><li>• Economic health</li><li>• Environmental health</li><li>• Community wellbeing</li><li>• Governance.</li></ul> <p>The proposed action has been planned to avoid and minimise impacts, and to protect and enhance the conservation values of adjacent Class A reserves, as summarised in Sections 4.4 and 4.5 of the preliminary documentation. This includes:</p> <ul style="list-style-type: none"><li>• Use of existing disturbed areas along road and railway corridors and residential areas</li><li>• Avoiding high conservation areas within adjacent A Class reserves</li><li>• Adopting recommendations of Aboriginal representatives</li><li>• Design and construction measures to protect and enhance conservation values of adjacent A Class reserves, including buffer revegetation, stormwater drainage and fencing.</li></ul>



No.	Comment	Response to Comment
1-3	<p>With projects being assessed without adequate consideration of the cumulative impacts in this region. Since the EPA assessments of MRS Amendments in this region (e.g. Bulletins No 971, 1139 or 1207, including the Ministerial Conditions 629 referred to in the Main Roads documents), several ecological communities have been listed at the national level as threatened (Banksia woodlands and Tuart woodlands) or as priority communities at the State level. We believe this indicates that the current legislative and policy mechanisms do not adequately protect biodiversity in the internationally recognised hotspot for biodiversity conservation.</p>	<p>Referral of the Mitchell Freeway Extension Burns Beach Road to Hester Avenue (EPBC 2013/7091) and the current proposed action were made with regard to the MNES listed at the time of each referral.</p> <p>The preliminary documentation (Sections 3.1.4 and 3.2.5) incorporates assessment of cumulative impacts to MNES through analysis of the extent and reservation of the Banksia Woodlands of the Swan Coastal Plain (BWSCP) threatened ecological community (TEC) and habitat for Carnaby's Cockatoo and Forest Red-tailed Black Cockatoo (FRTBC) in the locality and region.</p>
1-4	<p>The QREG was actively involved in the previous stage of the freeway extension, from Burns Beach Road to Hester Avenue. We are concerned that the practice of approving projects without detailed design do not give any motivation to minimise the impacts within the project footprint area. As a result, we have seen excessive clearing within the road reserves for Stage 1 of this Freeway extension project, with minimal retention of mature vegetation and revegetation outcomes patchy across the project area.</p> <p>Considering the significant conservation of vegetation within the mapped project footprint such as the Banksia and Tuart woodlands, we recommend that the detailed designs are assessed which will allow adequate consideration of any avoidance measures. In the current form there is not impetus to avoid or minimise impacts. During Stage 1 of this project, preliminary designs were used to identify mature trees that potentially might be retained, yet of the numerous trees identified, very few were retained. In addition, further clearing to facilitate utilities installations via the road reserve affected the small patch of vegetation that was retained during the freeway installation at the intersection with Burns Beach Road.</p>	<p>The preliminary documentation considers a maximum impact footprint for the proposed action within a Development Envelope, to provide a conservative assessment of potential impacts to MNES.</p> <p>The maximum impact footprint informs the assessment of potential significant residual impacts to MNES and the Draft Offset Strategy (Appendix E) including the quantum of land acquisition and funding. Therefore, any reduction in impact from the maximum footprint, through detailed design and construction management, will result in a net benefit to the residual impact estimated in the preliminary documentation.</p>



No.	Comment	Response to Comment
1-5	<p>The Ministerial Condition 629 requires preparation of the Fauna and Flora Management Plan and the Construction Management Plan for the proposed road works. MS 629 also lists the QREG as a stakeholder that should be consulted in the preparation of these plans. In Stage 1 this consultation led to the Group raising concerns. For this Stage, the QREG has been invited to provide comments, however, we are yet to be advised how the concerns raised are being addressed.</p>	<p>This comment refers to Ministerial Statement 629 issued under the WA <i>Environmental Protection Act 1986</i>, and does not relate to MNES under the Commonwealth EPBC Act.</p> <p>Notwithstanding, please refer to response to comment no. 1-1 with respect to consultation to date with QREG.</p>
1-6	<p>Lack of adequate detail on measures to facilitate fauna movement between Neerabup National Park and Neerabup Nature Reserve that will be significantly affected by the widening of Wanneroo Road. There is growing evidence on the importance of terrestrial fauna to maintaining ecosystem functions in Banksia woodlands of the Swan Coastal Plain, yet the provision of adequate fauna underpasses or overpasses has not been considered yet. Again, our experience with the implementation of Stage 1 show without detailed design, planning for adequate fauna underpasses can result in mixed outcomes.</p>	<p>This comment refers to ground fauna and does not relate to the MNES relevant to the proposed action, which comprise the BWSCP TEC, Carnaby's Cockatoo and FRTBC. No ground fauna listed under the EPBC Act have been recorded during surveys for the proposed action nor are likely to occur in the Development Envelope, as presented in the preliminary documentation (Appendix A: Biological Survey).</p> <p>Main Roads intends to install new fauna underpasses and fauna exclusion fencing under WA Ministerial Statement 629 and the VFMP, which has been prepared in consultation with QREG and with DBCA. One of two proposed new fauna underpasses will provide a connection between Neerabup National Park and Neerabup Nature Reserve. Note that there is an existing road severing these locations. Installation of a fauna underpass will significantly increase fauna movement between the National Park and the Nature Reserve.</p>
1-7	<p>The need for independent body responsible for monitoring the compliance with the approved management plans. Under current arrangements, compliance is the responsibility of the proponent and there is no possibility for independent review.</p>	<p>Main Roads will manage, monitor and report compliance against the EPBC Act approval conditions, as the proponent responsible for the proposed action. Main Roads has a proven record of monitoring and reporting compliance and non-compliance (where it has occurred) across many projects in the State.</p>



No.	Comment	Response to Comment
1-8	In addition, there does not seem to be any consideration of ecosystems connectivity in the North-South direction, to ensure there is connectivity of habitats maintained between the Neerabup National Park and Yanchep National Park to the north, via important remnants between them. Romeo Road widening will create a permanent barrier within the norther section of the Neerabup National Park.	Refer to response to comment 1-6.  One of two proposed new fauna underpasses will provide a connection between Neerabup National Park and remnant native vegetation north of Romeo Road. There is currently no direct connectivity between Neerabup National Park and Yanchep National Park. They are separated by 5 km.
1-9	The QREG is greatly concerned over the continued loss of habitat for the Carnaby's black cockatoos due to the cumulative impacts on habitat in this region. While the submitted documents refer to figures of percentage of vegetation remaining – most of the remaining vegetation is identified as future urban, industrial development, and for the associated infrastructure. Considering that Yanchep National Park includes a confirmed breeding habitat for the Carnaby's black cockatoos, retention for feeding habitat and potential breeding habitat in this region needs to be a priority.	The preliminary documentation (Section 3.2.5) includes mapping (Figures 5 and 6) identifying the potential extent of Carnaby's Cockatoo and FRTBC habitat remaining in the locality, including the potential habitat within reserves and Bush Forever sites.  As noted in Section 3.2.5 of the preliminary documentation, of the 6,047 ha of Carnaby's Cockatoo habitat mapped within 5 km of the Development Envelope, approximately 3,060 ha (51%) lies within reserved lands. Of the 5,533 ha of FRTBC habitat mapped within 5 km of the Development Envelope, approximately 2,847 ha (51%) also lies within reserved lands.
1-10	Our observations also show that this region is becoming important to the Red-tailed forest cockatoo, as it has been observed feeding in Quinns Rocks (suburb about 3km South-West of the proposed Freeway extension) on several occasions.	The preliminary documentation (Section 3.2) notes the use of the Development Envelope by FRTBC for foraging, assesses impacts to FRTBC habitat, and makes provision for offsets to counterbalance potential significant residual impacts to FRTBC (Appendix E: Draft Offset Strategy).

**Table 2 Response to comments raised by Wildflower Society of Western Australia (Inc)**

No.	Comment	Response to comment
2-1	We have two principle concerns: the lack of recognition that Tuart woodlands are now a Commonwealth-listed threatened ecological community (TEC); and the adequacy of offsets for residual impacts on the TECs affected. We address these in more detail below	Introductory comment, noted. Response to comments provided below.



No.	Comment	Response to comment
2-2	<p>According to the Construction Environment Management Plan (GHD 2019), approximately 8.56 ha of Tuart woodlands will be cleared by the proposal. Tuart Woodlands and Forests of the Swan Coastal Plain was listed by the Commonwealth government as a TEC in 2019, yet this has not been recognised in the Management Plan. Nor has any offset been offered for the residual impact on the TEC. This needs to be rectified.</p>	<p>Tuart Woodlands and Forests of the Swan Coastal Plain (TWFS CP) were not listed as a TEC under the EPBC Act at the time of referral and determination as a controlled action, and are not included in the controlling provisions for the proposed action. Accordingly the preliminary documentation is not required to address impacts or offset the impact to the TWFS CP TEC under the EPBC Act.</p>
2-3	<p>An offset package has been offered by MRWA to offset the impact on Black Cockatoos and Banksia Woodlands of the Swan Coastal Plain TEC (BWSCP). The portion of the package to offset the impact on the BWSCP TEC is a direct offset contributing 48% of the calculated component (Offset 2 – Ashworth Road, Gingin), with the remainder (52%) to come from a monetary contribution to the WA Offsets Fund (Offset 4), which will be used to purchase land in the Shire of Gingin.</p> <p>Both of these offset components are either located, or will be located (after anticipated land purchase/s), in the vicinity of Gingin. However, the conservation advice for the BWSCP TEC states that the impact should be offset as close as possible to the cleared vegetation (DEE 2016): "do not use offsets distant from the site of impact, as there is local variation of the ecological community".</p> <p>Furthermore, the conservation advice goes beyond recommending a simplistic like-for-like notion, stating: "Further to 'like-for-like' principles, match offsets to the same sub-community (usually Floristic Community Type), as it is not appropriate to offset losses of one component with other components of the ecological community".</p> <p>The WSWA contends that the proposed offset components (both direct and indirect) for the BWSCP TEC do not adhere to these guidelines: Gingin not only is substantially distant from the proposed clearing (at least 40 km), but the composition has not</p>	<p>Main Roads has developed the offset strategy in consultation with DBCA regarding prospective offset properties. The offsets for the BWSCP TEC will be located on the northern Swan Coastal Plain and as close to the proposed action as is practicable given the prospective properties identified by DBCA.</p> <p>Main Roads prioritise land acquisition in place of revegetation to achieve early and achievable offset outcomes, particularly for the BWSCP TEC, which requires a high biodiversity for revegetation success.</p> <p>Main Roads has approached DBCA regarding potential restoration of BWSCP TEC on DBCA owned land. However a suitable restoration offset has not been identified as an offset, at this point in time, due to a number of factors:</p> <ul style="list-style-type: none"><li>• Lack of availability of suitably sized land parcels</li><li>• Land identified by DBCA has uncontrolled public access which will diminish the success of restoration outcomes</li><li>• Cleared pine plantation, vested with DBCA, has restrictive land tenure that limits the preservation of restoration in perpetuity.</li></ul> <p>Main Roads will continue to explore the potential for revegetation of BWSCP TEC on DBCA owned land for other projects and actions. However given the timing of the proposed action revegetation is not proposed as an offset at this time.</p>





No.	Comment	Response to comment
	<p>been demonstrated to be close to that of the impacted vegetation (the composition almost certainly is substantially different). A proximal offset (i.e. within about 5 km), ideally including a revegetation component (to minimise the net loss of vegetation), would be the best option to minimise the ecological damage and adhere to the conservation advice. Land satisfying these criteria does exist, although it may be in private ownership and be considerably more expensive than land within the Shire of Gingin. A greater expense, however, should not be used as an excuse to inadequately offset the residual impacts, especially considering the vast expense (and budget) of the project as a whole.</p>	
2-4	<p>It is likely that MRWA will deem that avoiding any residual impacts on the Tuart Woodlands TEC will not be possible. Therefore, an offset for the impact on this TEC will also need to be offered. This offset should also adhere to the conservation advice for the Tuart Woodland TEC (DEE 2017).</p>	<p>Refer to response to comment 2-2 regarding the TWFS CP TEC.</p>
2-5	<p>In summary, the WSWA contends that an achievable and substantially better conservation outcome would result by MRWA offering proximal offsets for the residual impacts on the Banksia and Tuart Woodlands TECs, ideally with rehabilitation components. Furthermore, we contend that MRWA should ensure that such offsets adhere fully to the respective conservation guidelines for these TECs.</p>	<p>Refer to response to comment 2-2 regarding the TWFS CP TEC and response to comment 2-3 regarding the BWSCP TEC.</p>



No.	Comments	Response to comments
3-1	<p>I am aware that at this stage the scope of the project is unlikely to change, however I would implore the State government (namely Rita Saffioti and the Premier) to seriously consider taking the freeway all the way to Yanchep Beach Road in this next round of work. My reasoning is simple. Have we not learnt by now that it is cheaper, quicker and exponentially more efficient to get the job done right the first time?</p> <p>We are currently in the midst of a protracted widening project at the moment with regard to Marmion Avenue north. The inefficiency that has been observed over the past 12+ months on this project is concerning and disappointing. It has been a mess in my opinion. All the digging and realigning of underground infrastructure and services seems preposterous, and it shows clearly that the initial road was not designed collaboratively and with expansion in mind. So much money has been wasted digging up pipes for services that should have been installed properly the first time around. To the casual observer it appears to have been a dog's breakfast. Such a waste of time and money. I would sincerely hope the mistakes of the past are not being repeated, but I can assure you that if we do not spend the extra money now, that in less than 5 years we will be pushing the freeway north again and going through all this disruption again because someone has finally decided the freeway should continue north.</p> <p>A government with a bit of courage to spend their own money and not rely on Commonwealth funds to be the catalyst for a project will be rewarded in the polls. Everyone in the northern suburbs will love it as it would show some strategic thinking beyond what is currently being displayed. Contrary to the media reports, the government is not seen as being proactive. To the contrary, they are still being very reactive (to the growing northern suburbs) and sadly I don't see much change on the horizon. I agree, there is a LOT of work being done on the Mitchell Freeway currently and I applaud that, but it is all work that should have been done years ago. I'm elated it is happening, but it is still happening too slowly for my liking, and it is not enough. Everyone I speak to from the northern suburbs agrees with me.</p> <p>Every single day there is a bottleneck heading south on the Mitchell into the city between Joondalup and Hepburn Ave. It seems absolutely ludicrous to me that this section of freeway has not been widened! My understanding is that the CoA funds have already been allocated funding to that project by Infrastructure Australia. What's more, the road is already primed for widening in that area, so it begs the question, why the delay? Seriously, commuters are so used to delays now due to roadworks that extra pain at the northern end of the freeway in parallel to the works being done around Hutton St etc would be accepted. More than that, it</p>	<p>This submission does not relate to impacts to MNES, however for the sake of completeness a response is provided below.</p> <p>Construction of the extension of Mitchell Freeway is being staged due to funding availability.</p> <p>The staging of the proposed action and previous Stage 1 freeway extension is consistent with the Mitchell Freeway Extension Strategic Business Case (2012), developed in consultation with a Community Working Group.</p> <p>All works along Marmion Avenue north, including relocation of services, are the responsibility of City of Wanneroo.</p> <p>Main Roads is currently undertaking development work associated with widening Mitchell Freeway from Hodges Drive to Hepburn Avenue. Widening this section of the freeway is anticipated to commence late 2020, early 2021.</p> <p>Night works are generally avoided for a number of issues – primarily worker safety and community amenity (night noise). Generally night works are only undertaken where the roads works would have a significant impact on traffic flows.</p>



No.	Comments	Response to comments
	<p>would be welcomed, because it would mean that all the works would be completed THIS YEAR and once done commuters could look forward to a fantastic run into the city at any time of day from end to end. This relatively small piece of widening work should be a priority. How ironic is it that the Hutton St (and surrounds) work will assist traffic into the city from Cedric St heading south, yet 20km up the road (further away from the city) there is a major bottleneck that can add 15 minutes to a journey each morning in an area where there is less traffic on the road than there is closer to the city, yet the congestion is worse? It's crazy, and it needs to be fixed, fast.</p> <p>One final thought. Next time you guys review a tender response, please give kudos to the responder that says that can do the work in half the time by working 24 hours a day (yes, night shift work) for the duration of the project. One would think that halving the schedule duration would be looked on favourably, even if it does cost more at the end of the day. Not rocket science. Perception is everything</p>	



Appendix B

Copy of public comments received on  
preliminary documentation



PO Box 27, Quinns Rocks WA 6030

1 March 2020

Marni Baetge  
Senior Environment Officer  
Main Roads Western Australia

Email: [marni.baetge@mainroads.wa.gov.au](mailto:marni.baetge@mainroads.wa.gov.au)

**SUBMISSION 2018/8367: MITCHELL FREEWAY EXTENSION HESTER AVENUE TO ROMEO ROAD, AND WANNEROO ROAD UPGRADE**

The Quinns Rocks Environmental Group (QREG) is a local community group promoting conservation and sustainability since 1985. We have advocated to protect habitat and influence planning decisions, run environmental awareness raising activities and undertaken on-ground work including rehabilitation planting, flora and fauna surveys and litter clean ups.

The QREG participated in all public consultation relating to land use changes in the North West corridor (generally the coastal area between Burns Beach and Pipidiny Roads), advocating for better consideration and protection of biodiversity, geo-heritage and more recently the need for consideration of impacts of climate change in decision making. Therefore, it is more than disappointing to see in this corridor the continuation of the development pattern that resulted in loss of biodiversity and landscape values in other parts of the metropolitan region.

With projects being assessed without adequate consideration of the cumulative impacts in this region. Since the EPA assessments of MRS Amendments in this region (e.g. Bulletins No 971, 1139 or 1207, including the Ministerial Conditions 629 referred to in the Main Roads documents), several ecological communities have been listed at the national level as threatened (Banksia woodlands and Tuart woodlands) or as priority communities at the State level. We believe this indicates that the current legislative and policy mechanisms do not adequately protect biodiversity in the internationally recognised hotspot for biodiversity conservation.

In this context we offer the following comments on the presented documentation:

**Assessment of concept design vs detailed design and offsets**

The QREG was actively involved in the previous stage of the freeway extension, from Burns Beach Road to Hester Avenue. We are concerned that the practice of approving projects without detailed design do not give any motivation to minimise the impacts within the project footprint area. As a result, we have seen excessive clearing within the road reserves for Stage 1 of this Freeway extension project, with minimal retention of mature vegetation and revegetation outcomes patchy across the project area.

Considering the significant conservation of vegetation within the mapped project footprint such as the Banksia and Tuart woodlands, we recommend that the detailed designs are assessed which will allow adequate consideration of any avoidance measures. In the current

form there is not impetus to avoid or minimise impacts. During Stage 1 of this project, preliminary designs were used to identify mature trees that potentially might be retained, yet of the numerous trees identified, very few were retained. In addition, further clearing to facilitate utilities installations via the road reserve affected the small patch of vegetation that was retained during the freeway installation at the intersection with Burns Beach Road.

While Main Roads proposes to offset the impacts, the QREG has long been concerned over the inadequacy of the offsets as a mechanism for delivering no net loss.

## **Environmental Management Plan**

The Ministerial Condition 629 requires preparation of the Fauna and Flora Management Plan and the Construction Management Plan for the proposed road works. MS 629 also lists the QREG as a stakeholder that should be consulted in the preparation of these plans. In Stage 1 this consultation led to the Group raising concerns. For this Stage, the QREG has been invited to provide comments, however, we are yet to be advised how the concerns raised are being addressed.

Some of the key issues raised that is relevant to the matters listed under provisions of the Environmental Protection and Biodiversity Conservation Act 1999 include:

- Lack of adequate detail on measures to facilitate fauna movement between Neerabup National Park and Neerabup Nature Reserve that will be significantly affected by the widening of Wanneroo Road. There is growing evidence on the importance of terrestrial fauna to maintaining ecosystem functions in Banksia woodlands of the Swan Coastal Plain, yet the provision of adequate fauna underpasses or overpasses has not been considered yet. Again, our experience with the implementation of Stage 1 show without detailed design, planning for adequate fauna underpasses can result in mixed outcomes.
- The need for independent body responsible for monitoring the compliance with the approved management plans. Under current arrangements, compliance is the responsibility of the proponent and there is no possibility for independent review.

In addition, there does not seem to be any consideration of ecosystems connectivity in the North-South direction, to ensure there is connectivity of habitats maintained between the Neerabup National Park and Yanchep National Park to the north, via important remnants between them. Romeo Road widening will create a permanent barrier within the northern section of the Neerabup National Park.

## **Carnaby's and Forest Red Tailed Black Cockatoos**

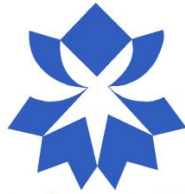
The QREG is greatly concerned over the continued loss of habitat for the Carnaby's black cockatoos due to the cumulative impacts on habitat in this region. While the submitted documents refer to figures of percentage of vegetation remaining – most of the remaining vegetation is identified as future urban, industrial development, and for the associated infrastructure. Considering that Yanchep National Park includes a confirmed breeding habitat for the Carnaby's black cockatoos, retention for feeding habitat and potential breeding habitat in this region needs to be a priority.

Our observations also show that this region is becoming important to the Red-tailed forest cockatoo, as it has been observed feeding in Quinns Rocks (suburb about 3km South-West of the proposed Freeway extension) on several occasions.

The QREG will welcome an opportunity to discuss these matters further. Please email to [quinnsenvirons@yahoo.com.au](mailto:quinnsenvirons@yahoo.com.au) or contact me on 0447 303 792.

Yours sincerely,

Renata Zelinova  
For the Quinns Rocks Environmental Group Inc



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

29 February 2019

Marni Baetge  
Senior Environment Officer  
Infrastructure Delivery Directorate  
Main Roads Western Australia

### **MITCHELL FREEWAY EXTENSION PROJECT, HESTER AVENUE TO ROMEO ROAD**

The Wildflower Society of Western Australia (WSWA) would like Main Roads Western Australia (MRWA) to consider our comments on the Preliminary Documentation for the Mitchell Freeway Extension project, Hester Avenue to Romeo Road. We have two principle concerns: the lack of recognition that Tuart woodlands are now a Commonwealth-listed threatened ecological community (TEC); and the adequacy of offsets for residual impacts on the TECs affected. We address these in more detail below.

#### **Tuart Woodlands and Forests of the Swan Coastal Plain**

According to the Construction Environment Management Plan (GHD 2019), approximately 8.56 ha of Tuart woodlands will be cleared by the proposal. Tuart Woodlands and Forests of the Swan Coastal Plain was listed by the Commonwealth government as a TEC in 2019, yet this has not been recognised in the Management Plan. Nor has any offset been offered for the residual impact on the TEC. This needs to be rectified.

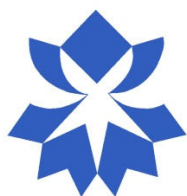
#### **Adequacies of Offsets**

An offset package has been offered by MRWA to offset the impact on Black Cockatoos and Banksia Woodlands of the Swan Coastal Plain TEC (BWSCP). The portion of the package to offset the impact on the BWSCP TEC is a direct offset contributing 48% of the calculated component (Offset 2 – Ashworth Road, Gingin), with the remainder (52%) to come from a monetary contribution to the WA Offsets Fund (Offset 4), which will be used to purchase land in the Shire of Gingin.

Both of these offset components are either located, or will be located (after anticipated land purchase/s), in the vicinity of Gingin. However, the conservation advice for the BWSCP TEC states that the impact should be offset as close as possible to the cleared vegetation (DEE 2016):

"do not use offsets distant from the site of impact, as there is local variation of the ecological community".





## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Furthermore, the conservation advice goes beyond recommending a simplistic like-for-like notion, stating:

"Further to 'like-for-like' principles, match offsets to the same sub-community (usually Floristic Community Type), as it is not appropriate to offset losses of one component with other components of the ecological community"

The WSWA contends that the proposed offset components (both direct and indirect) for the BWSCP TEC do not adhere to these guidelines: Gingin not only is substantially distant from the proposed clearing (at least 40 km), but the composition has not been demonstrated to be close to that of the impacted vegetation (the composition almost certainly is substantially different). A proximal offset (i.e. within about 5 km), ideally including a revegetation component (to minimise the net loss of vegetation), would be the best option to minimise the ecological damage and adhere to the conservation advice. Land satisfying these criteria does exist, although it may be in private ownership and be considerably more expensive than land within the Shire of Gingin. A greater expense, however, should not be used as an excuse to inadequately offset the residual impacts, especially considering the vast expense (and budget) of the project as a whole.

It is likely that MRWA will deem that avoiding any residual impacts on the Tuart Woodlands TEC will not be possible. Therefore, an offset for the impact on this TEC will also need to be offered. This offset should also adhere to the conservation advice for the Tuart Woodland TEC (DEE 2017).

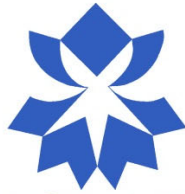
### **Concluding Remarks**

In summary, the WSWA contends that an achievable and substantially better conservation outcome would result by MRWA offering proximal offsets for the residual impacts on the Banksia and Tuart Woodlands TECs, ideally with rehabilitation components. Furthermore, we contend that MRWA should ensure that such offsets adhere fully to the respective conservation guidelines for these TECs.

### **References**

Department of Environment and Energy (2016). Approved Conservation Advice (incorporating listing advice) for the Banksia Woodlands of the Swan Coastal Plain ecological community

Department of Environment and Energy (2017). Tuart (*Eucalyptus gomphocephala*) woodlands and forests of the Swan Coastal Plain Ecological Community: draft conservation advice including draft listing advice. October 2017.



## WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

GHD (2019). Mitchell Freeway Extension (Hester Avenue to Romeo Road) EPBC 2018/8367 Construction Environmental Management Plan. December 2019.

Yours faithfully,

Dr J.E. Wajon, FRACI  
Chair, Wildflower Society Roadside Vegetation sub-committee  
C/- 16 Eckersley Heights, Winthrop WA 6150  
Phone 9310 2936 (H) 0428 345 231 (M)

**From:** [ALLEN Carl](#)  
**To:** [BAETGE Marni \(SEO\)](#)  
**Subject:** Mitchell Freeway Extension Feedback  
**Date:** Monday, 24 February 2020 1:45:36 PM

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Hi Marni,

I am writing to you as I am unsure whom to address my concerns to. As new information has just become public re environmental approvals etc on the freeway north extension and I saw your name there you have drawn the short straw 😊 Hopefully you can pass this on to the decision makers please.

I am aware that at this stage the scope of the project is unlikely to change, however I would implore the State government (namely Rita Saffioti and the Premier) to **seriously consider taking the freeway all the way to Yanchep Beach Road** in this next round of work. My reasoning is simple. Have we not learnt by now that it is cheaper, quicker and exponentially more efficient to get the job done right the first time? We are currently in the midst of a protracted widening project at the moment with regard to Marmion Avenue north. The inefficiency that has been observed over the past 12+ months on this project is concerning and disappointing. It has been a mess in my opinion. All the digging and realigning of underground infrastructure and services seems preposterous, and it shows clearly that the initial road was not designed collaboratively and with expansion in mind. So much money has been wasted digging up pipes for services that should have been installed properly the first time around. To the casual observer it appears to have been a dog's breakfast. Such a waste of time and money. I would sincerely hope the mistakes of the past are not being repeated, but I can assure you that if we do not spend the extra money now, that in less than 5 years we will be pushing the freeway north again and going through all this disruption again because someone has finally decided the freeway should continue north. Why not do it properly now? A government with a bit of courage to **spend their own money** and not rely on Commonwealth funds to be the catalyst for a project will be rewarded in the polls. Everyone in the northern suburbs will love it as it would show some strategic thinking beyond what is currently being displayed. Contrary to the media reports, the government is not seen as being proactive. To the contrary, they are **still** being very reactive (to the growing northern suburbs) and sadly I don't see much change on the horizon. I agree, there is a LOT of work being done on the Mitchell Freeway currently and I applaud that, but it is all work that should have been done years ago. I'm elated it is happening, but it is still happening too slowly for my liking, and it is not enough. Everyone I speak to from the northern suburbs agrees with me.

Which brings me to the elephant in the room. Every single day there is a bottleneck heading south on the Mitchell into the city between Joondalup and Hepburn Ave. It seems absolutely ludicrous to me that this section of freeway has not been widened! My understanding is that the CoA funds have already been allocated funding to that project by Infrastructure Australia. Whatsmore, the road is already primed for widening in that area, so it begs the question, why the delay? Seriously, commuters are so used to delays now due to roadworks that extra pain at the northern end of the freeway in parallel to the works being done around Hutton St etc would be accepted. More than that, it would be welcomed, because it would mean that all the works would be completed THIS YEAR and once done commuters could look forward to a fantastic run

into the city at any time of day from end to end. This relatively small piece of widening work should be a priority. How ironic is it that the Hutton St (and surrounds) work will assist traffic into the city from Cedric St heading south, yet 20km up the road (further away from the city) there is a major bottleneck that can add 15 minutes to a journey each morning in an area where there is less traffic on the road than there is closer to the city, yet the congestion is worse? It's crazy, and it needs to be fixed, fast.

Anyway, that's my feedback. Overall, the government is doing a great job, but I can't help but feel WA just doesn't have the resources to do all this work at once? And if we do, why isn't it happening? I travel to the east coast a lot for work and there is so much more happening over there. Just when I think WA is finally getting something done, I go to Sydney and realise that their infrastructure projects completely dwarf ours. It's embarrassing to be frank.

One final thought. Next time you guys review a tender response, please give kudos to the responder that says that can do the work in half the time by working 24 hours a day (yes, night shift work) for the duration of the project. One would think that halving the schedule duration would be looked on favourably, even if it does cost more at the end of the day. Not rocket science. Perception is everything.

Sincerely,

Carl Allen.  
Yanchep resident.  
0409 880 207

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