



A Co-operative venture of the municipalities of:
Cockburn, East Fremantle, Fremantle, Kwinana, Melville & Rockingham

12 September, 2011

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Our Reference: SWG RHE Submission 2011

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Attention Gerard O'Brien

SOUTH WEST GROUP COMMENTS ON THE ROE HIGHWAY EXTENSION PUBLIC ENVIRONMENTAL REVIEW (PER)

This submission from the South West Group is provided in response to the public release of the Roe Highway Extension Public Environmental Review (PER) on 20 June 2011 for a 12 week public review period concluding on 12 September 2011.

Background

The South West Group's vision is as follows:

“Local government in South Metropolitan Perth, through cooperation with industry, community and other spheres of government will capture a wide range of opportunities to enhance economic growth, promote a resilient economy as well as supporting a diversity of quality lifestyles whilst servicing and sustaining cohesive, productive communities in an enviable environmental setting.”

The South West Group and its member councils have been extensively involved in the Roe Highway Extension (RHE) Project consultation and have a keen interest in the project.

The project has been challenging for a number of the member councils due to the concern about the environmental impacts of the project and how these would be managed. The comments provided in this submission need to be read in the context that not all SWG member councils support the proposed extension of Roe Highway.

There are a number of incorrect statements and editorial errors that have been identified in the PER following a review process. A response to these and suggested amendments are provided in the Attachment. As well as these amendments, the South West Group's submission on the PER addresses a

number of key, strategic issues related to providing biodiversity offsets in the region and the establishment of appropriate funding arrangements to support offsets and rehabilitation requirements. These are outlined below.

PER overview

The PER has made a comprehensive assessment of the impacts of the extension of the Roe Highway and has added to the understanding of the environmental values of the area.

The environmental impacts associated with the RHE are complex and significant. Although it is recognised that the EPA and the Minister for the Environment will determine the environmental acceptability or otherwise of the RHE impacts and their management, the South West Group is concerned over the consistency of information and terminology of environmental issues such as the extent of Roe Swamp, as communicated in community consultation forums. Further advice on this issue, and additional details regarding the submission, is provided in the Attachment.

South West Group response

General

The PER is supported by the South West Group as being a valuable contribution to the understanding of the environment in the vicinity of the RHE.

Staged construction of the project should be considered as an option within the PER, but with early commencement of the environmental offsets for the whole project.

The justification of the project and the traffic impacts should have been better communicated to ensure the community has a better appreciation and understanding of economic and social issues associated with the RHE.

Confirmation is given that, if the RHE proceeds, all road drainage will be piped and discharged into controlled areas for treatment and/or recovery of spills to avoid impacts on the sensitive receiving environment. This was a commitment given by the South Metro Connect at community consultation forums, but is not addressed adequately in the PER

The impact of excessive lighting on fauna was also raised in community forums, however RHE cross sections in the PER show standard light fittings for street lights. If the RHE proceeds, the design should replace standard lights with low impact lighting in the environmentally sensitive areas.

Biodiversity Offsets

The offsets for the RHE construction need to be better balanced to provide benefits within the region and focus on remediation of existing conservation areas (such as the Beeliar and Rockingham Lakes Regional Parks and Kwinana Industry Buffer Zone) and improving environmental linkages through the enhancement of

biodiversity corridors. There are significant opportunities to rehabilitate and improve the extent and condition of conservation value vegetation through application of RHE offsets in the region. This more locally focussed approach is consistent with the EPA's 2008 Guidance Statement 19 on Biodiversity Offsets.

It is also recommended that an Offsets Strategy for the RHE be developed by South Metro Connect, in consultation with the DEC and relevant Local Governments, to confirm the detailed arrangements associated with the offset proposals presented in the PER.

It is clear that the conservation and rehabilitation works will be significant to achieve offset requirements. The proposed \$100,000 contribution to the DEC's Environmental Community Grants Scheme to support volunteer conservation activities for restoration of Horse Paddock Swamp and North Lake (Offset Proposal 2) is considered inadequate and should be increased and extended to other restoration offset activities throughout the local area and the region.

A funding package to support the Offsets Strategy should be achieved by increasing the remediation funding to a minimum of \$5 million to be spent entirely within the region. This allocation would include funding to purchase land in the Southern Metropolitan Region for direct offsets suitable for black cockatoo habitat (Offset Proposal 1).

Should you have any queries regarding the South West Group submission, including those attached, please contact Mick McCarthy, Director South West Group on ph 9364 0631 or mob 0478 325 469 or email mick.mccarthy@melville.wa.gov.au

Yours sincerely



**Dr Brad Pettitt, Mayor of Fremantle
Chair South West Group**

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ATTACHMENT

This attachment provides supplementary information to the South West Group submission on the Roe Highway Extension Public Environmental Review (PER), including details regarding Roe Swamp and comments/suggested amendments on the content in the PER report.

Roe Swamp

The PER has made representation of the RHE as having greater impact by changing the extent of the Roe Swamp from the small, restricted area of the Roe Wetland near Hope Road to a much greater area encompassing both Lower Swamp and Melaleuca Swamp together with the surrounding sumpland. During the community consultation the preferred option was described as passing north of Roe Swamp whereas it now is represented as passing through Roe Swamp.

Further explanation on the way the Roe Swamp has been depicted and described is required to assist in addressing issues raised during the public consultation period and to provide adequate information for concerned stakeholders to better understand wetland impacts.

Comments

Page i - Terminus should not have been used to describe the current termination of the Roe Highway

Page ii - The document is confusing as to how it refers to the alignment as being at Roe Swamp. Later in the document (such as at page 310) it identifies the small wetland next to Hope Road as Roe Swamp but also refers to the broader area including Lower Swamp and Melaleuca Swamp with the surrounding sumpland as Roe Swamp.

Page iii - The date for close of submissions is nominated as 5 September 2011 rather than 12 September 2011.

Page v - The Murdoch Activity Centre is referred to as employing thousands of people...it will employ tens of thousands of people and be the largest employment centre outside of the CBD. The figure of 35,000 employment should have been used.

Page 5 - Light spill is mentioned without subsequent design changes. The community desire for biodiversity offsets to be undertaken within the region has not been mentioned.

Pages 21 and 24 - The maps do not explicitly show the Australian Marine Complex, Kwinana Industrial Area and Latitude 32. Armadale and Anketell Roads should be identified as major roads. The location of key locations and activities is incorrect. For example, Curtin University is shown as being south of Manning Road and the International Terminal appears to be displaced to the north.

Page 25 - The Murdoch Activity Centre is not well described as being an urban growth area and will have a much greater role in employment and economic development.

Page 56 -Light spill is not mentioned.

Page 71, Figure 3.4-7 - The cross section should show low profile bollards for lighting and not standard poles.

Page 101 - Reference to 6508, 6509 and 6510 on the eastern fringes of Bibra Lake as Roe Swamp appears to be an error.

Page 361 – The broader use for the definition of Roe Swamp is confusing, as mentioned above, and needs to be rectified and communicated to stakeholders to enable better understanding of impacts.

Page 404 - Reference should be made that all road drainage will be piped.

Page 703 and 704 - As much offset activity should be undertaken within the South West Corridor and the Cities of Melville and Cockburn should be consulted on the nature of the offsets. Rather than purchase land outside of the metropolitan area it is preferable that degraded areas within the Beeliar Regional Park, the Kwinana Industry Buffer Zone and the Rockingham Lakes Regional Park are rehabilitated. There are opportunities to establish feeding habitat for Carnaby's, Baudin's and the Forest Red Tailed Cockatoos in locations such as Chalk Hill, and Mount Brown. It is requested that the amount of funding for rehabilitation within the South West Region is increased from \$100,000 for *Typha* removal in Thompson Lake to \$5 million for a much broader package taking into account all of the offset proposals under consideration. The 470ha land offset could be correspondingly reduced if this could be achieved. Local government should be eligible to access the funding on DEC supported projects. An Offsets Strategy, developed in consultation with the DEC and the South West Group member councils, is required to gain agreement and facilitate implementation of the agreed offsets package.

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