



Written Submission in support of:

## Petition No. 076 – Planned upgrade to Toodyay Road East Dryandra Road, Morangup

Tabled by Hon Darren West MLC in the Legislative Council on 29 November 2022



Our mission is to preserve the scenic value & improve the safety of Toodyay roads through alternative methods to widespread clearing & major realignments.

## Background

In its [Wheatbelt Highway Safety Review of 2015](#), the State Government identifies the Main Roads Western Australia (MRWA) project which “includes construction of urgent passing lanes, shoulder widening and some realignment works”. Furthermore, the MRWA Business Case states that: “The existing alignment and configuration are not meeting current design standards and guidelines and is resulting in poor safety outcomes as evidenced by the latest available 2014-18 crash statistics”.

Key SASTR members were on the original Community Reference Group (CRG) that met in 2015/17 with MRWA but were shocked by the first stage of the upgrade between Jingaling Brook Road and Lovers Lane on Toodyay Road in 2020. As a result of the upgrade, the CRG members felt inadequately informed of the full extent of clearing and damage that would result from the upgrade.

In response to the environmental destruction caused by MRWA, Safe and Scenic Toodyay Roads (SASTR) was formed in 2021.

Toodyay is a small community that highly values a sense of place, environment and safety. The petition calls for a halt to the upcoming upgrades while more environmentally sensitive plans are devised that will also deliver a safer road, a goal that is shared across the Toodyay community.

## Why we oppose the roadworks

### The CRG process was flawed:

In 2015, the community met to discuss the need for Toodyay Road improvements, asking for some overtaking lanes, some places to stop and intersections to be improved. In June 2017, the first of the CRG meetings commenced.

- The maps were projected on a screen, and paper copies provided were way too small. It was impossible to see the detail of the proposed changes and fully comprehend their scale and extent. This was not suitable for conveying and receiving information about the major environmental impact.
- A [video shown](#), lacked environmental detail
- Due to the cancellation of a previously planned CRG before the beginning of the work at Jingaling Brook, many people attended the CRG meeting in February 2021 to protest the level of clearing. A number of people wanted to discuss what they viewed as excessive environmental damage, but no one was allowed to speak - there was no consultation.
- When the [public doesn't have adequate input into the process](#) it is unfair and shows a poor attitude to community concerns.

### Climate Change

There is no doubt that Toodyay Road needs improvement, but the current plans require substantial clearing and ignore the natural landscape and existing environmental values. Moreover, they are **irresponsible in an era of climate change and unprecedented species extinctions**.

It is unconscionable to destroy 57 ha of native vegetation that provides habitat for Carnaby's Black-cockatoos, Chuditch, and many priority flora species.

Parts of the Salt Valley/Sandplain Road section have never been cleared or grazed and may be the only remaining pre-European vegetation in that area.

According to MRWA, “climate change and the environment are two of their top priorities for the WA community”. The recent [State of the Environment Report](#) and the **Federal Government's intention to [prevent further extinctions](#)** of Australian wildlife require MRWA and the WA Government

to address current and upcoming projects to mitigate environmental risks.

[Between 2019 and 2022, 514 ha of native vegetation](#) in the Wheatbelt was approved to be cleared. **A total of 257 ha (50%) of this area was approved for road construction or maintenance.**

In response to a question about why the section of road most affected by mass clearing could not follow the existing road, MRWA said because it was cheaper - a telling indication of how much value MRWA places on the environment.

### Endangered Species

We will be losing:

- **1306** Potential breeding trees for black cockatoos with 94 hollows
- **33** ha of foraging habitat for black cockatoos
- **32.5** ha of suitable habitat for Chuditch

The most major being at Sandplain and Salt Valley roads which initially planned:

- **13.61** ha of native vegetation
- **188** Cockatoo breeding trees
- **8.90** ha of cockatoo foraging habitat
- **7** Priority plants

Due to successive state governments' failures, **black cockatoos and Chuditch are on the verge of extinction**. In spite of the Labor government's vow to protect such species, habitat destruction continues unabated.

It takes **over 100 years for a tree hollow to form** large enough to house a black cockatoo, but MRWA is using artificial nest boxes as an argument to offset the destruction of mature trees. It is a band-aid solution. It is imperative that efforts are made to prevent the destruction of these homes.

### Do we need the scale of proposed roadworks?

It is acknowledged that new roads and improvements to existing ones are needed, but MRWA's remit must shift to road building that is more environmentally responsible. This could include using techniques such as **sealed shoulders, rumble strips and crash barriers as opposed to excessive widening of the carriageway**.

Such techniques have been advocated by the Wildflower Society for years and MRWA's own data show that this is the most cost-effective solution to achieve a safer road.

These low cost, environmentally friendly solutions have already been implemented successfully on Toodyay Road in the Shire of Swan. For reasons MRWA have yet to explain, they plan to upgrade the Toodyay Shire section to the level of engineering that will transform this iconic country road into a soulless highway akin to Great Northern Highway.

The \$100 million funding, including state and federal dollars, seems excessive and with horrific accidents occurring on other Toodyay roads that desperately need maintenance, some of this money would be more welcome elsewhere.

Also:

- Compared with the road improvements on the metropolitan section where traffic density is higher and proportional to its locality, the section at Jingaling Brook and upcoming roadworks are not warranted.
- There is a failure to utilise more land that is already cleared
- Improvements to the Salt Valley Road/Sandplain Road area could be accomplished by following the existing road where hectares of bush would be saved.
- Many overtaking lanes affect mature vegetation along the road in the densest areas. Fernie Road's slip lane turning into a passing lane, for example, is less than 5km



from Jingaling Brook. The next passing lane is the approach to Gidgegannup townsite, 20km away. Placing it further west would cause much less clearing and improve the distances for passing opportunities.

- A slip lane for trucks is required from Fernie Road but only for a distance of 200m which would also avoid the loss of vegetation in this area.
- Our negotiations have seen MRWA alter their plans slightly to save a stand of orchids near Dryandra Road as well as 85 mature trees in the Sandplain/Salt Valley Roads vicinity. However, 103 mature trees will still be lost in that area. This area has been set to be cleared of vegetation over a 90-metre-wide strip, and the road will be deeply cut into the hillside. In a December 2021 meeting with MRWA, we were told the depth of the cutting into the hill would be reduced to 4 metres (originally 12m) and the width of the clearing would be reduced to 50 metres from 90 metres. MRWA is yet to confirm the width measurement, but we have been informed that the height of the cutting has been reduced to only 6 metres.
- Although we are grateful for these changes addressed, there are still many areas of concern as only 2.59ha of 22.18ha clearing in this area will be saved, which is very disappointing. We are also told that the reduction in quantity is an estimate only and may vary slightly to facilitate the construction.

### Crash Statistics are outdated

The MRWA Business case states that: *“It has the highest rate of killed or seriously injured crashes within the Wheatbelt Region. The number of people who are killed or injured on Toodyay Road is significantly higher than the State average per kilometre of road (Road Safety Commission, 2015).”*

**From 2015 to 2020 the crash statistics dramatically dropped to almost 50% of previous figures** following a public awareness campaign, a lower speed limit and an increased police presence. This was achieved with no major road upgrades. We are concerned the current plans may increase accidents due to the intention, as defined in the **MRWA business plan, to raise the speed limit back to 110kph**. Speed is the most common cause for accidents and accident incidence increases exponentially with speeds above 110kph.

According to the report, [Preliminary summary of fatalities on Western Australian roads](#), 70% of all serious crashes are due to human error and numerous studies here in Australia and overseas show evidence that when a road is perceived to be safe, the driving behaviour gets worse.

Our understanding is that the speed limit will remain at 100 km/hr for the time being despite the fact the road is designed for 110 km/hr, which has been omitted from the MRWA business plan.

### Green Washing Offsets

MRWA justifies much of its clearing by declaring that that it will be setting aside and protecting an even larger area of allegedly similar vegetation as offset for the proposed clearing of mature woodland (some 20 kms away from Toodyay Road in a different shire!). These so-called offsets are widely discredited by environmental experts.

[An ANU study](#) suggests it is virtually impossible to establish equivalent sites as "offsets" once pristine remnant vegetation is lost and selecting an area for preservation does not replace what has been lost. The structure and diversity of the original vegetation cannot be easily replicated. This is evident from the works already undertaken on Toodyay Road. There is no comparison between the offset vegetation and the mature vegetation being cleared, which includes mature Wandoo and Powderbark Wandoo trees, some of

which are over 400 years old, providing significant habitat for vulnerable species.

### Wheatbelt history of excessive clearing

[About 60% of native vegetation of the Avon River Basin has been cleared](#) since European settlement and an average of 2500ha have been approved for clearing per year since 2010.

[Wheatbelt NRM](#) reports that the Avon region has only 11% native vegetation which falls below the target of 30% native vegetation cover required to maintain an ecologically viable landscape. **Clearance of roadside vegetation by both MRWA and shires accounts for 50% of all Wheatbelt clearance permissions.**

### Tourism

At one meeting with MRWA, it was stated that *“Toodyay Road is not a tourist route”*. The numerous tourists who visit Toodyay to enjoy its cafés, bakery, gift shops, historic buildings, as well as its unique environment, including the iconic scenic drive from Perth, would probably beg to differ.

One visitor commented: *“As a potential tourist for Toodyay I can tell you that the run from Gidge [Gidgegannup] to Toodyay is no longer anywhere near as scenic and pleasing!”*

Aside from the damage to native fauna and flora, the widely acknowledged beauty of Toodyay Road, which is in part drawing tourists to the region, will be utterly destroyed by MRWA's improvements.

### What we have done

- **Online petition:** Alongside the 1000+ signatures for the legislative council, we also have over 4000 signatures [for our online petition](#).
- **Survey:** We surveyed 108 people and [results can be found here](#).
- **Meetings:** We have had multiple meetings with MRWA including a walkthrough
- **Communications:** Written articles for the Toodyay Herald as well as [as our website](#) and [updates via social media](#)
- Negotiated alterations to the plans:
  - Saved a 420-yr-old tree and some of its friends
  - Reduced the impact of the Salt Valley/Sandplain clearing slightly.
  - Saved a portion of a 20metre strip of various orchid species
- **Meetings with MPs:** Our local MPs have been helpful and in particular, Mr Shane Love our MLA member was able to put some questions raised by SASTR to the Minister of Transport at recent Budget Estimates. [Responses can be seen here](#).
- Had a lot of discussions with the general public and the Toodyay community.

In light of the above, we ask that the State Government delay planned works along one of Western Australia's most iconic country roads, Toodyay Road, in order to review the upgrade proposed by Main Roads WA (MRWA).

We have a combined total of over 5000 signatures for our legislative council and [online petitions](#) and along with our [survey](#) results, there is resounding proof of strong community concern for the environment and the impact of the currently planned changes which are substantial and disproportionate to the improvements required for Toodyay Road that they need to be revised urgently.

Improved safety is important but there are ways of achieving this without trading off environmental values. We firmly believe the current plans do not get the balance right.