

Dear Hon Mathew Swinbourn MLC,

Petition no. 052 – Murdoch Drive Connection Project

We write to ask that the Standing Committee on Environment and Public Affairs further investigate the Murdoch Drive Connection Project (MDC).

Construction on the MDC Project has already commenced despite the fact that specific zoning, planning and environmental approvals are not yet in place. This pre-empts outcomes of those important processes and denies the right of public consultation and input into a major project. We understand that the MDC Project is being constructed on the assumption that Ministerial Statement 1008 purportedly authorises implementation of that project.

SBW has referred the MDC Project to the EPA under Part IV of the Environmental Protection Act 1986 (WA) as we consider that proposal will have significantly detrimental effects on the environment that are in addition to, and different from, the effect of the original Roe 8 proposal that were contemplated in Ministerial Statement 1008. There are also fiscal, public health and safety and planning risks associated with building a project which is not fit for purpose, has fundamentally changed in nature from the project originally approved and which has not been fully reviewed.

Roe 8 was intended to be a high capacity regional road for the purposes of providing freight access to Fremantle Port. However, the State Government has publicly indicated that the development will not be pursued. In comparison, we understand the MDC Project is not intended as a primary freight route. Rather, it has been characterised by the proponent as an activity centre access route with additional connections to local roads. In these circumstances the MDC Project amounts to an entirely new proposal with significantly different objectives and environmental effects.

It is not appropriate for MRWA to rely on a Ministerial Statement that was based on an assessment undertaken for a project intended for an entirely different purpose and with entirely different effects. MS1008 is based on the "full build" scenario of the Roe 8 Proposal and does not contemplate the exclusive building of the MDC Project alone. For example, condition 12(4) of MS1008 covers mitigation actions for Roe 8 as a whole and not the subcomponent represented by the MDC Proposal.

In the absence of the full Roe 8 build, we are concerned that traffic must disperse elsewhere in the MDC Project scenario. The environmental impacts are unclear and accordingly require assessment.

We are also concerned about the proponent's management of the sensitive woodlands and wetlands in the area of the MDC Project; and the potential of the MDC Project to increase the detrimental effects on this environment. A systemic and science-based review is necessary for management of the MDC Project in this sensitive context.

We are concerned about the assumptions used for the traffic volume considerations and many aspects of the environmental impact claimed for the MDC. These include: whether they are based entirely on forecasting past car traffic demand; whether they take into account a significant shift from car to other modes, particularly the Murdoch Activity Centre public transport proposals (including light rail); the extent to which they take into account other road network changes such as upgraded intersections or additional traffic lanes; on which basis traffic growth is assumed (for example, the future land use

and activity levels) and; which of the four options (local road connections) has become the Approved Concept Design; the volume of traffic west of Kwinana Freeway; and the volume of traffic on Kwinana Freeway (north- and south-bound) south of Roe Highway.

Projected increased traffic on Murdoch Drive north of Farrington Road and its reduction on the Kwinana Freeway, could result in considerable congestion at intersections on Murdoch Drive, undermining the ability of emergency vehicles to access the hospital, as well as making the road more hostile for other modes of transport (such as walking, cycling and public transport).

We also consider that projected increases on Hope Road and Progress Drive associated with the MDC Project will have a detrimental effect on the local community and environment. We believe that there are many simpler road treatments which could resolve any current or future needs. The Noise Management Plan required by Section 6-2(1) of MS 1008 assumes traffic flow for a full Roe 8 build scenario. There is a possibility that mitigation of the associated environmental impacts such as noise would require a redesign and any proposal relying on the previous assessment could be invalidated if challenged. We understand that impacts of the MDC Project on sensitive noise receivers must be sufficiently considered. The public comment process for MS 1008 did not focus on the sub-component represented by the MDC Project because the major impact was shifted to the full Roe 8 Proposal. In the absence of the full Roe 8 build, there would be a significant change in the traffic flow for the MDC Project network that has not been considered for public comment by highly sensitive noise receivers such as Blue Gum Montessori School, nearby residents and future stakeholders in the planned activity centre.

A Planning Control Area (PCA) was put in place to protect land from development until an amendment of the Metropolitan Redevelopment Scheme (MRS) has been made. Any development within the PCA needs to be referred to the WAPC for approval. Similarly, any development within Parks and Recreation and Public Purpose land under the MRS should be referred to WAPC for approval, The only land that can be developed without that approval is land that is already in the Primary Regional Road reservation. We understand that more than half of the MDC Proposal area is entirely outside the MRS road reservation.

For a development that has such diverse public interest and groups who do not agree on all aspects, we suggest that an MRS amendment process, which may also remove the rest of the MS 1008 development envelope, should take place before the new MDC Proposal with different objectives is considered. We therefore believe that it is unreasonable to proceed with the MDC Proposal without first considering the MRS amendment. At the very least we ask that construction on the MDC be halted whilst the serious planning, environmental, and safety issues highlighted in this submission are resolved.

Yours Sincerely,

Kate Kelly (convenor) on behalf of Save Beelias Wetlands