

Hon Peter Foster MLC
Chair, Environment and Public Affairs Committee
Legislative Council Committee Office
Parliament House
4 Harvest Terrace
West Perth WA 6005

10 January 2022

Dear Mr Foster,

Petition No. 41 – Southern Link Road Stage 3

Your ref: A934185

Please find attached the written submission providing a background to the petition and a summary of the issues.

Thank you for considering this matter.

Yours sincerely,

Mrs Jo Stone

Submission to support Petition No. 41 - Southern Link Road Stage 3

Southern Link Road Stage 3 is proposed to join the southern end of Gerard Street to northern-most point of Grey Street, Cannington. The construction of this road will destroy part of the Cannington Claypan, a Conservation Category Wetland which hosts two critically endangered Threatened Ecological Communities (TEC) and several listed species.

The Cannington Claypan is a 6.71 hectare conservation category wetland. The TEC known as *Shrublands and Woodlands on Muchea Limestone of the Swan Coastal Plain* has been reported from the site and covers 5.8 ha of the wetland. It is listed as endangered under the *Commonwealth Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and critically endangered by the WA Threatened Ecological Communities Advisory Committee. This community was added to Schedule 2 of the *Endangered Species Protection Act 1992* for the following reasons:

1. "The community has been reduced at least 90%, probably over 97%, by clearing, mainly for agricultural purposes.
2. "Only about 73 ha is known to remain, in four isolated remnants, of which all except about 6 ha was on private land prior to a further acquisition in July 1999, purchased with funds from the Natural Heritage Trust and the Western Australian Government.
3. "All but two of the remaining patches are threatened by clearing, those on private land are grazed by stock, or have been rolled, and weed invasion is significant for all occurrences."

The site also contains the EPBC-listed critically endangered *Clay Pans of the Swan Coastal Plain* TEC. One threatened and five priority listed flora species and at least one threatened fauna species have also been recorded from the site.

This is a biologically diverse remnant in an extensively cleared landscape of which less than 10% (probably less than 3%) of its original extent remains. This is significantly less than the 30% or more of the pre-clearing extent of each ecological community that is necessary if Australia's biological diversity is to be protected.

Further, the proposed area to be cleared is wholly contained within a seasonal wetland that becomes inundated during the winter months and usually stays wet into early summer. Approximately two thirds of the proposed clearing will be through an area classified as a conservation wetland, the remaining one third will be through a multiple use wetland. The document *Guideline for the Determination of Wetland Buffer Requirements* indicates that a buffer zone around wetlands is necessary to maintain the hydrological and ecological values of the wetland. Further, when proposed for TEC status, the listing advice for *Clay Pans of the Swan Coastal Plain* TEC states:

"Buffer zones around the clay pans are important for protecting intact bushland from further weed invasion. The recommendation for protection of clay pans includes a vegetated buffer of 50 m, however the width of the buffer required may be greater, depending on the type of development proposed, the local hydrology, and other factors. Restoration planting in degraded buffer zones should be considered where possible."

Due to historical development in the area, there are no buffers remaining around the wetland. Constructing Southern Link Road stage 3 will further diminish the current values of the conservation wetland. Again, the listing advice for *Clay Pans of the Swan Coastal Plain* TEC, states:

"The most serious threat is ongoing clearing or drainage of the clay pans for urban expansion of Perth city and semi-urban and agricultural development. Clearing and drainage of the clay pans results in a situation where recovery of patches of the ecological community is not possible."

It is also worth noting that the Canning City Centre Movement, Access and Parking Strategy (appendix 6 to the draft Canning City Centre Activity Centre Plan) acknowledges that construction of the Southern Link Road will increase congestion on Albany Highway. The Executive Summary of this document states:

“The Albany Highway / Liege Street intersection has been found to be the key bottleneck along Albany Highway both now and into the future.”

In the same document, in section 4.6, it is acknowledged that road development can keep the traffic moving but that travel times along Albany Highway would be degraded. It goes on to suggest that reducing reliance on private motor vehicles is more critical. It states:

“The trafficable demand that the Westfield Carousel expansion would create without significant parking demand management is expected to be significant and would have a major impact on the efficiency of the network (particularly on Albany Highway). There appears to be a number of infrastructure improvements that can be done that can manage the accessibility such that traffic can continue to move (these include the Sevenoaks Street Extension, the Southern Link Road, Gerard Street extension), but this would result in degradation of the travel times along Albany Highway, which may be unacceptable to some agencies. To accommodate the proposed Westfield Carousel expansion in the context of the full Canning City Centre Structure Plan vision, management of car travel (through interventions such as paid car parking), improved public transport infrastructure, improvements to encourage walking and cycling, and improved mix of uses is more critical.”

It would appear that there is very little benefit to the local community from this road and it will worsen conditions experienced by all motorists using Albany Highway at the Liege Street intersection.

I have taken great interest in this proposal since I brought this site to the attention of authorities in the early-2000s. Since then, the City of Canning has modified the position of the road to avoid bisecting the wetland and TECs but persist with their intention to build it.

The proposal to construct Southern Link Road stage 3 is currently with the Department of Agriculture, Water and the Environment awaiting assessment by the Environmental Protection Authority (EPA) under the (EPBC Act). I provided my comments regarding this proposal prior to the public comment closing date of 16 December 2020 (more than 12 months ago).

More recently, on my behalf, Cr Saberi moved a motion at the City of Canning Ordinary Council Meeting (OCM) of 21 September 2021 asking that the grant allocations and funding be removed for this project. Council deferred the decision to the OCM of 16 November 2021 at which the motion was again deferred – this time until after the EPA provides their decision.

I stand firm in my belief that an ecological community that has been recognised as being critically endangered should not be further diminished. To have been listed as critically endangered, a TEC has to have already been reduced in extent by more than 90%. I believe that once a TEC has reached this stage there should be no further destruction permitted for any reason.

I therefore request that the Standing Committee on Environment and Public Affairs call on the City of Canning to abandon the construction of Southern Link Road stage 3 through a conservation category wetland and two Threatened Ecological Communities.