



## NATURE RESERVES PRESERVATION GROUP

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Date. 7 April 2021

### **Subject: Tonkin Highway Grade separated interchanges (Hale Road and Welshpool Road (updated)).**

This submission is on behalf of Nature Reserves Preservation Group (NRPG) Inc. an environmental community group operating in the hills and foothills of the metropolitan area.

The above proposal will involve clearing of an area of significant natural vegetation. The significance of much of this lies in its value as habitat and, in its function in providing connectivity between environmentally significant natural areas. The biggest contributors to the destruction of connectivity values are, clearing for housing developments and, for infrastructure projects such as this.

More weight should be assigned to the presence and importance of designated Bush Forever sites which would be affected by the project (a total of six). This project would significantly diminish both habitat and connectivity values of these sites. The launching of Bush Forever in 2000, included some wetlands of the Swan Coastal Plain and was seen as an important initiative for protecting some of the Perth region wetlands. The importance of the wetlands likely to be damaged by the proposal should receive the greatest attention when determining the degree of assessment warranted.

Of particular concern is the damage to be caused to an iconic wetland area, the Greater Brixton Street Wetlands. On the Register of the National Estate, these wetlands are of vital environmental value. The potential damage to such an important and scarce biodiversity asset should be avoided at all cost. The fact these wetlands lie within an area almost totally cleared of native vegetation only increases their environmental value. On the Swan Coastal Plain alone *“it is estimated that between 70 to 80 per cent of all wetlands have been filled, drained or cleared ... It is therefore very important that they are protected and managed in an ecologically sustainable way.”* (Water Facts. Water and Rivers Commission. 2001)

Current proposals for a Yule Brook Regional Park would be severely damaged by this project. Including the Brixton Street Wetlands and the Yule Brook Reserve, the Regional Park would provide a corridor from Lesmurdie Falls, through the Greater Brixton Street Wetlands to the Canning River. The importance of the Yule Brook Reserve alone, to botanical education should be considered. Purchased by the University of Western Australia in 1949 for botanical research and teaching, the reserve remains in regular use for that purpose. Any damage to these significant wetlands should be avoided. They should not,

however be considered in isolation. For the efficient protection of wetlands, 'catchment scale' solutions must be implemented.

Past housing and industrial development clearing and the increasing development demands facing the Swan Coastal Plain and the foothills, serve to increase the environmental value of every remaining hectare of natural vegetation. The potential clearing of up to 50 hectares of native vegetation with its habitat and biodiversity values should not be permitted.

In addressing the potential loss of native vegetation, the proponent refers to the prospect of meeting EPA requirements by the use of Environmental Offsets. NRPG considers the offsets policy and guidelines as a flawed concept, all too frequently employed as a first step, rather than (as recommended) a last step. Its flaw? There is always a net **loss** of that environmental value being "offset".

Given the important environmental questions requiring answers, the potential for significant long-term environmental damage and the concern of our members for those points, NRPG requests the proposal be assessed by the EPA and that the assessment be at the level of a Public Environmental Review.

Anthony Fowler

p.p. Steve Gates, President.