**18 REASONS TO CHANGE THE ROUTE OF BORR SOUTHERN SECTION (BORR-SS)**

**(BORR = Bunbury Outer Ring Road)**

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**INTRODUCTION TO THESE 18 REASONS**

This document summarises eighteen serious problems with the Gelorup corridor in the BORR-SS alignment, more than enough to justify moving the route slightly south east onto cleared land. There are more than eighteen reasons now, and even more will be exposed in the near future.

Changing the alignment to cleared land would result in overwhelming support for the aims and plans of the BORR project, something it doesn’t enjoy now. The combined problems of the current BORR-SS alignment reveal it as a case of really bad planning. The win-win-win solution requested below would overcome all the problems summarised below, create a near consensus on the project, hasten construction, and produce an outer ring road which will serve at least 40-50 years into the future. To retain the BORR-SS would result in a lose-lose-lose situation.

Almost 1,100 submissions were made to the EPA Review (WA) and the DEWA Review under the EPBC Act (Commonwealth), from a range of people and organisations, with a variety of expertise, and very diverse substantial criticisms. This large number of submissions demonstrates how widespread is the opposition to the MRWA intended route of the southern part of the BORR, on environmental issues. Many other criticisms are of economic and social problems of BORR-SS, but no independent review has ever been conducted into these.

I am a sociologist and have been an active campaigner for social justice, community education, environmental improvements and consultation standards for over fifty years. The process which MRWA used for BORR-SS has been one of the worst I have ever seen, especially as it has the largest budget for an infrastructure project in the south west of WA. Taxpayers deserve better than a problem-riddled, destructive, temporary fix, at huge cost, on an inappropriate strip of land. This document is my personal summary of the large number of serious social, economic and environmental problems of using the Gelorup corridor as the alignment for the BORR-SS. When aggregated, these problems demonstrate why the Alternative Alignment should become the route for construction. Although not a member of the Friends of Gelorup Corridor Group (FOTGC), and not living in the locality, I know the corridor and its people, and strongly support FOTGC’s position on the BORR-SS. For those wanting detailed information and news, I recommend the website of the group on: <https://www.friendsofgelorup.com/> In particular, on the home page of this website, use one or both red buttons titled “READ THE STATE EPA SUBMISSION HERE ” and “READ THE FEDERAL EPBC SUBMISSION HERE”. The public was never offered comment on social and economic issues with the BORR-SS.

**1 THE MAIN ROADS SELECTED ALIGNMENT IS NOT FIT FOR PURPOSE**

Fitness for Purpose is not a subjective assessment or opinion. Infrastructure Australia (IA) and MRWA use Primary Design Objectives (PDOs) to serve as criteria for assessment of infrastructure proposals. BORR-SS fails to satisfy these PDOs, as well as having the other problems below. In particular, PDOs which MRWA clearly breaches are:

1. Maximises safety;
2. Minimises adverse impacts and enhances environment where possible;
3. Integrates visually with the surrounding environment;
4. Takes into account the views of the public, including local residents, …community groups, …

The land in this alignment through the rural residential precinct of Gelorup was set aside in 1975, for a rural highway to serve as a ring road around Bunbury. No construction ever ensued, and it is no longer fit for the purpose of a vastly extended four lane freeway, to serve for at least 40 years into the future. The narrow neck through the Gelorup community is in stark contrast to dimensions along the 150km of Kwinana Freeway and Forrest Highway leading to the BORR from the north, and Bussell Highway from the South. The above highways are a minimum of 130 metres wide, whereas the Gelorup corridor is only 65 metres minimum. It is so unsustainable that the plan is already obsolete.

Many substantial changes have taken place since the Gelorup corridor was first announced nearly 50 years ago, which when combined, make the BORR-SS verifiably inappropriate for an expensive plan which claims to serve until at least 2060, probably longer. These major changes are summarised in many of the Reasons in this document, and include: infrastructure guidelines and road design criteria, all the houses and property developments being built next to the corridor over decades, compilation of increased and new data on the threats to protected flora and fauna in the corridor, community standards, social and economic weaknesses, discovery of impacts of the road previously not documented; increasing effects of climate change, and more.

When all the reasons for change below and further ones in the two public Reviews are analysed, it is clear that at a bureaucratic level the BORR–SS is sheer bad planning, and at a political level is poor decision making, both of which are delaying the completion of this much-needed ring road, and promoting a lose-lose-lose outcome.

**2 1,600 HECTARES OF MOSTLY CLEARED LAND IS NEARBY FOR AN ALTERNATIVE ALIGNMENT**

Federal and WA guidelines state major infrastructure must be on cleared land in preference to bushland. Yet MRWA’s alignment prefers a bushland and rural residential option when there are about 1,600 hectares of mainly cleared land nearby. This huge area has not been rigorously assessed for an alternative route which requires no significant clearing of bushland. Out of date and inaccurate information was used in MRWA’s inadequate assessment of its Alternative Alignment, particularly in classifying land in that alignment as “high value agricultural” when it is not high value. An alignment using the cleared land to the nearby south east, with up-to-date and accurate information, would avoid any removal of people from their homes and properties, or significant clearing of native bush, some protected. The Gelorup corridor contains bushland with protected flora and fauna species, and houses and family infrastructure, as shown below. Most rural highways in WA are constructed by MRWA on cleared land.

**So, can the BORR-SS be changed at this stage?** The BORR Northern Section (BORR-NS) shows unequivocally that a change of alignment can be made in the BORR-SS plan, despite claims by one local politician that it is not possible. Many plans are changed at various stages of a project, before and after approval, and sometimes relatively late in the process. The alignment of the northern section of this very same BORR project was changed radically in 2018, late in the process. The new route increased the length of the whole BORR from 19 to 27 kms, an extra 9 kms. Costly infrastructure was added, and further properties acquired. MRWA had already purchased properties along the initial BORR Northern Section, and those acquisitions did not prevent the route being changed later. So the alignment of BORR-SS can be changed to a better route now, just as easily as BORR-NS was at a similar stage.

The Alternative Alignment would not add significantly to travel time, and if a thorough cost-benefit analysis of the two routes was to be undertaken, the Alternative Alignment is likely to be less expensive, as well as avoiding the serious problems raised in this document.

**3 FALSE INFORMATION USED IN SELECTION OF BORR-SS ALIGNMENT**

False and outdated information was used to discriminate against the Alternative Alignment. Assessments are mostly from 1995 or earlier. MRWA claimed that it would go through good quality agricultural land, when in fact it would not. Two out of seven constraints listed for design are: ‘Large farm lots with dairy and stock operations; Agricultural activities’; however, many studies of the land in the Alternative Alignment describe it as having ‘low capability for agricultural or grazing use’. The Greater Bunbury Region Scheme Priority Agricultural Land Policy 2017 also does not classify the alternative route as being in the ‘Priority Agricultural Land Policy Area.’ (West Australian Planning Commission, 2017). Even the Shire of Capel stated that ‘The Spearwood and Bassendean Soil Systems have only ‘moderate capability for grazing’, with the farmland requiring ‘extra nutrients and … supplementary feed’ (Shire of Capel, ‘Land Use Strategy’, page25). No farming practices other than light grazing are in the Alternative Alignment, but claims were made that it is valuable agricultural land, to enable MRWA to select the Gelorup corridor route.

MRWA documents conclude that the Gelorup corridor route would involve less environmental impacts than the Alternative Alignment, yet it has allowed out of date and in some cases false information to give preference to bushland and housing areas for destruction.

**4 USING GELORUP CORRIDOR ROUTE WOULD DESTROY SIGNIFICANT PROTECTED FLORA**

A significant area of bushland containing four Heritage WA listed protected trees would be destroyed: two Christmas, one Woody Pear and one Holly Leaf Banksia. In addition, 76 ha of protected Banksia and Tuart/Banksia Woodland, assessed as Critically Endangered or Endangered would be destroyed. This serious known threat to biodiversity and protected flora species and habitat loss is proposed despite 1,600 hectares of cleared land nearby, for the Alternative Alignment which would require none of this destruction of protected bushland and other values.

The WA Government has a duty to protect flora which are scientifically classified as protected, especially when cleared land options are nearby.

**5 USING GELORUP CORRIDOR ROUTE WOULD DESTROY SIGNIFICANT PROTECTED FAUNA**

MRWA plans to locate a freeway in the narrow corridor containing the following species of fauna: Western Ring-tail Possum (Critically Endangered), Black Cockatoos (3 species, 2 Endangered and 1 Vulnerable), Black Stripe Minnow (Endangered) and Southern Brown Bandicoot (Endangered). Also, this plan would destroy the habitat of up to 44 hectares of Brush-tail Phascogale (Vulnerable). At stake in this alignment are the foraging, habitat, nesting and breeding needs of these and other fauna. The WA Government has a duty to protect fauna which are scientifically classified as protected, especially when cleared land options are nearby.

**6 NO SUSTAINABILITY ANALYSIS OF BORR-SS COMPLETED AND PUBLISHED**

There is no evidence that MRWA actually performed a comprehensive Sustainability Analysis for the BORR-SS, and yet the WA Government has selected the Gelorup corridor route, subject only to environmental approval.

The BORR Team compared the approved "red route" through the Gelorup corridor to the alternative "green route" through cleared land. It was only a qualitative comparison and not a quantitative evaluation that should have included all the sustainability factors that were mentioned in FOTGC's letters to MRWA's Project Director. Furthermore, the community has never seen any cost estimates, cost comparisons of optional routes nor any cost-benefit analysis for the BORR-SS. MRWA has not been transparent with the community about costings or economic issues related to the BORR, and the level of community consultation by MRWA on the BORR project to date has been poor.

There was never any Sustainability Analysis completed and published by MRWA as a basis for its claim that the Gelorup Corridor is a sustainable route for a four lane high speed modern freeway. The result is that the public has been denied its right to comment on the above claim. MRWA has gained WA Government approval for the BORR Southern Section to be routed through the sensitive Gelorup corridor, resulting in a non-sustainable freeway that will split a viable local community into two parts, and result in significant long term environmental, social and economic damage.The absence of a sustainability analysis provides a further reason to shift the BORR-SS to the cleared land Alternative Alignment.

**7 NO FUTURE TRAIN POSSIBLE IN THE CORRIDOR**

The corridor through Gelorup is too narrow for any train infrastructure. This contravenes federal and state guidelines that road and train infrastructure be co-located, and therefore possibly breaches federal grant requirements. The exclusion of any planning for a rail corridor within BORR-SS is not only bad planning, but will delay a future train to the south, and also require a second corridor to be found, investigated, published for community comment and submitted for approvals, with all the extra costs involved. A second corridor of land would have to be purchased. Proper project planning would co-locate road and rail in the one corridor – a much cheaper and quicker option than planning two corridors. By not including land for a future train in this BORR-SS proposal is further evidence that there is no published economic cost-benefit analysis of the two alignments, because the costings of MRWA’s preferred option and the Alternative Alignment would be very different. The alternative alignment would clearly be cheaper if MRWA had investigated two options for the ring road, both with future rail included. The greater south west community has not been informed that the Bunbury Outer Ring Road has not been designed to include a future rail service – secrecy which is inexcusable. It would create a furore in the south west if widely publicised.

The WA government must ensure that the BORR co-locates road and rail in the one corridor.

**8 NO VEGETATED MEDIAN STRIP POSSIBLE IN THE CORRIDOR**

The Gelorup corridor segment of the BORR-SS is too narrow for a vegetated median strip to be included. This means that a two lane each way freeway with speeds up to 110km per hour will have concrete barriers separating oncoming traffic. Lack of a median strip in this narrow, unsafe strip proposed for BORR-SS, plus other design weaknesses summarised in this document, means that it does not conform to modern highway standards. MRWA’s documents contradict each other, because in some are statements about the value of vegetated median strips for traveller safety, while others state that due to the narrowness of the Gelorup corridor, concrete barriers will be used. Another contradiction in MRWA’s documents is the claim that vegetated median strips are beneficial for reducing effects of vehicle pollution and road runoff, yet by choosing the Gelorup corridor they are unable to provide any vegetated median strips in the corridor! See section 15 below for more on this.

The WA government must ensure that the BORR is in a corridor which can provide vegetated median strips.

**9 NO COSTINGS OR COST-BENEFIT ANALYSES PROVIDED FOR COMMUNITY TO SCRUTINISE**

Despite being one of the largest ever infrastructure in the south west projects (total budget of approximately $850 million), the BORR is one of the least transparent. MRWA has not provided the public, or even the two BORR Community Reference Groups, with any detailed cost estimates, or any business case, or any cost comparisons of two alternative routes, or any project cost-benefit analyses. These are routinely provided by the proponent in all open, transparent proposed developments, and without them, essential information is withheld from the entire community. This totally contradicts any MRWA claim to using “due process” and “professional community consultation”.

The failure to publish a cost-benefit analysis of the two optional routes is badly flawed process, especially given its record high cost. The choice of alignment was made by using false and outdated data to eliminate the Alternative Alignment. At least two major economic elements are missing from MRWA’s documentation, because of its failure to provide cost-benefit analyses. Firstly, the cost of permanently covering up about $685 million worth of basalt rock, a highly valuable resource (discussed below) is a huge loss almost equivalent to the cost of the whole BORR, but not transparently revealed in any cost-benefit analysis. Secondly, the omission of land for a future train co-located with road within the BORR-SS (discussed above) makes the Gelorup corridor appear cheaper, when in fact if road and rail corridors were included in both options and accounted for properly, the Alternative Alignment would almost certainly be cheaper.

The absence of a cost-benefit analysis provides a further reason to shift the BORR-SS to the Alternative Alignment.

**10 NO BUSHFIRE MANAGEMENT PLAN, OR EMERGENCY PLAN, DESPITE INCREASED FIRE AND EMERGENCY RISKS**

MRWA plans show that it plans to close some local roads as part of BORR-SS, resulting in less fire and emergency exit roads. Gelorup and Stratham are classified as fire risk areas, and climate change will increase this risk. Despite BORR-SS increasing these risks, MRWA has not published a Bushfire Management Plan or Emergency Management Plan, or communicated with local residents whose lives and properties will be at increased risk if BORR-SS goes through the Gelorup corridor. If the Alternate alignment is used, these risks will be significantly reduced.

The absence of a Bushfire Management Plan or Emergency Management Plan provides a further reason to shift the BORR-SS to the Alternative Alignment, where the risks would be far less.

**11 NO COMPREHENSIVE SOCIO-ECONOMIC ASSESSMENT COMPLETED AND PUBLISHED**

During the earlier CRG meetings, MRWA consistently referred to a report that was to study the social and economic impacts of BORR, but this report was highly flawed in both its methodology and conclusions (KPMG Socio-Economic Impact Assessment, September 2019, known as SEIA). It was meant to be performed using the methodology of the NSW Roads and Maritime document (SEIA Report, p32 Table 3-3), which was provided by the BORR Team’s Project Director to the CRG members. The SEIA Report by KPMG should therefore have been a comprehensive, quantitative assessment of the social and economic impacts caused by the BORR Project, and not just a qualitative, small sample assessment which relied primarily on minimal interviews by KPMG’s Project Manager with only a few CRG representatives, community members and local government stakeholders. In fact, for the largest infrastructure project ever proposed in the south west, the KPMG report interviewed just eight people (Appendix B p46). This is a highly unprofessional process. It enabled MRWA to minimise the social and economic effects, while using the word “sustainable” as dishonest spin in documents and public relations.

The absence of a socio-economic assessment provides a further reason to shift the BORR-SS to the Alternative Alignment on cleared land.

**12 PLANNED ALIGNMENT WOULD COVER UP ABOUT 685 MILLION DOLLARS WORTH OF BASALT ROCK**

The current plan for BORR-SS passes between the existing Gelorup basalt quarries, wasting 13.7 million tonnes of basalt, or blue metal; worth a conservative $685 million (almost the cost of the whole BORR).  MRWA has refused to publish any cost benefit analysis showing the loss of this resource as part of their plan for BORR-SS. This egregious waste of a strategic resource of regional significance cannot be justified or excused.  The Capel Shire Council's opposition to this route on economic and environmental sustainability grounds should be supported.  The Council's request that the resource be preserved for future use for coastal erosion mitigation should also be supported, especially given that it is based on State and Federal government reports that predict up to 30,000 homes and businesses will be at risk of flooding by the end of this century from increasingly severe storms, and that local councils are specifically requested to identify and quarantine such resources for this very reason.  The planned route of BORR-SS would be involve a serious misuse of public funds, without a cost benefit analysis ever being released to the public, and the McGowan Government needs to apply its generally good economic management to this proposal.

In the major federal report entitled Climate Change Risks to Coastal Buildings and Infrastructure (Dept of Climate Change and Energy Efficiency, 2011) and similar state reports (Coastal Erosion Hotspots in WA, 2019 and Climate Change in WA, 2019) requirement that federal, state and local governments to work together to identify and preserve strategic raw materials, such as basalt, for future coastal climate change mitigation.

Shifting the current route of the BORR-SS would avoid the utter waste of almost $700 million worth of much needed basalt rock.

**13 UP TO 30 HOUSEHOLDS TO LOSE THEIR HOMES AND PROPERTIES - UNNECESSARILY**

About 12 households have already been induced to move out of their dream homes and properties, resulting in immense trauma and dislocation for most. A further 18 households are likely to face the same pressures. If the Alternative Alignment is used on cleared land and infrastructure reserves, not one person would lose their precious house and property, or be dislocated from neighbours and friends. MRWA has been using various persuasive techniques to pre-emptively buy the properties and move people out, even though the EPA and DEWA Reviews have not yet been completed, and therefore no unconditional approval of the BORR-SS has yet been made.

A video of the trauma experienced by one family, whose dream home and property were resumed, is on the FOTGC website. It is titled “Robyn’s Story”. With 12 already, up to 30 households could have similar experiences.

MRWA has used cleared land for the construction of Forrest Highway, Bussell Highway and in plans for the BORR Northern Section, so those precedents must also apply in the BORR Southern Section.

**14 CORRIDOR ALIGNMENT IS CAUSING A SERIOUS SPLIT IN THE LOCAL COMMUNITY**

In recent years, the Gelorup community, once a cohesive and harmonious one, has been increasingly divided because of the BORR-SS proposal, which plans for a freeway through this rural residential area. The division has expanded, so that simmering disagreements and conflicts are experienced in the Gelorup, Stratham, Elgin, Capel and Dalyellup local communities. Also, the pressure applied by MRWA to buy homes and properties, and move people out, together with more resumptions planned, has produced much grief and resentment, forcing friends to move apart, and relocating families. Also, many other households whose homes are not being resumed will suffer noise, visual ugliness, air pollution, pollution of drinking and other water, and night lighting. This is adding to stress in the community.

Using the Alternative Alignment would restore harmony and positivity to this whole community.

**15 POLLUTION FROM DIESEL PARTICULATES AND ROAD RUNOFF NOT REPORTED AS SIGNIFICANT**

Without providing scientifically accepted data, MRWA repeatedly wrote off the high risks of serious pollution from vehicle emission particulates (especially diesel) and road runoff. Litter, chemicals, toxic organics and heavy metals are among the polluting elements. It simply concluded that such pollution is “ … considered not likely to be significant” (UESD, p156). Contaminated surface water and groundwater has the potential to impact sensitive receptors including neighbouring properties, vegetation, fauna, wetlands and waterways and could manifest downstream as loss of benthic habitat, fish deaths and damage to vegetation health (Updated Environmental Supporting Document and Additional Information, p 155). MRWA did discuss mitigation measures, but only as they relate to **construction** of the road, and **not to the operation** of the constructed road. One example of MRWA’s claim of mitigation actions, through the use of vegetated median strips, is absurd because the Gelorup corridor is too narrow, and concrete barriers are planned instead! No vegetated median strips mean that there will be little mitigation of pollution. Without scheme water, residents totally rely on rainwater and groundwater.

**16 EXCESS NOISE LEVELS AND LOSS OF VISUAL AMENITY**

All residents in this rural residential area deserve enjoyment of auditory conditions and visual amenity in and around their homes. The planned freeway through the narrow, populated Gelorup corridor will produce excess noise levels and a significant loss of visual amenity. Attempts by MRWA to mitigate the otherwise excess sound produced by BORR-SS involve ugly sound barriers which contradict one of its own Primary Design Objectives (PDOs), namely:

**“Integrates visually with the surrounding environment”**. Unsightly noise walls close to housing were never part of the original plan, and are unacceptable today. Submissions on the FOTGC website contain data on the excessive noise levels proposed by MRWA.

These losses of amenity, through higher than permissible noise levels and ugly constructions, result from the flawed decision to push a freeway through a rural residential area. It demonstrates yet another Reason why the Alternative Alignment on cleared land must be approved.

**17 LOCAL SHIRE COUNCIL IS OPPOSED TO THE BORR-SS ROUTE**

After lengthy research, briefings and discussion, the Capel Shire Council has resolved to oppose the BORR-SS through the Gelorup corridor. While supporting the concept of the BORR as a whole, the council is dissatisfied with MRWA’s process and conclusions on the BORR Southern Section, and wants the route to be moved to cleared land and existing transport and infrastructure corridors to the south east, as explained in this document. The opposition of the local government council in which most of the BORR-SS is located, shows that the problems with this route are significant, the legal status of the BORR-SS is more complicated, and that the challenges to the route are growing.

**18 THE ALTERNATIVE ALIGNMENT WOULD AVOID AN UNSUITABLE SECTION OF BUSSELL HIGHWAY**

The current BORR-SS route is planned to join Bussell Highway near Woods Road, and then proceed south along Bussell Highway. This section is the most problematic in terms of operation and safety standards. By moving BORR to the Alternative Alignment, it would join Bussell Highway to the south of West Boyanup Road, avoiding a poor quality section of Bussell Highway, and thus improve the overall road standards of the journey.

**WIN-WIN-WIN SOLUTION FOR BUNBURY OUTER RING ROAD (BORR)**

**With the exception of the Gelorup corridor in the Southern Section, the advantages of the BORR for the people and economy of WA, and particularly for the South West, are overwhelmingly supported, including by opponents of the current BORR-SS Alignment. The problems with the BORR-SS are many and serious, as shown in the 18 Reasons in this document and particularly in most of the 1,100 submissions received in state and federal reviews**. **When these 18 Reasons are considered together, they make a compelling case for changing the route in the southernmost section. If a reader is not persuaded by a few of the Reasons, the remainder of the 18 still form a convincing argument for change.**

**A solution to all these problems is available and feasible. It requires the WA Government to recognise the inappropriateness and unsustainability of the Gelorup corridor in the BORR Southern Section, because of the social, economic and environmental damage which will result if this alignment is retained. The solution is to build the BORR-SS on cleared land either on the Alternative Alignment, or some nearby variation of this alignment, on the 1,600 hectares of cleared land nearby. An Alternative Alignment, fully fit for future purpose, and avoiding the many forms of damage of the Gelorup corridor route, is the win-win-win solution. A win for the many people who will benefit from the ring road, a win for the corridor and all its social, environmental and economic values, and a win for the government of WA.**

**SUGGESTED ACTION:**

If you are concerned about any of the 18 Reasons above, for changing the route of the BORR Southern Section to an Alternative Alignment on cleared land, it is suggested that you express your concerns to key members of the WA Government and local members. Some email addresses are provided below to help you.

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| Mark McGowan Premier | wa-government@dpc.wa.gov.au |
| Rita Saffioti Minister for Transport  | Minister.Saffioti@dpc.wa.gov.au |
| Amber-Jade Sanderson Minister for the Environment | Minister.Sanderson@dpc.wa.gov.au |
| Alannah MacTiernan MLC for SW and Cabinet Minister | Alannah.mactiernan.mlc@mp.wa.gov.au |
| Don Punch Member for Bunbury and Cabinet Minister | Bunbury@mp.wa.gov.au |
| Jodie Hanns Member for Collie Preston | Jodie.Hanns@mp.wa.gov.au |
| Sally Talbot MLC for South West Region | sally.talbot@mp.wa.gov.au |