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Hon John Carey, Minister for lands under the Land Administration Act
Email: Minister.Carey@dpc.wa.gov.au

Bunbury Outer Ring Road (Southern Section)

Dear Mr Carey

You would be aware that the Appeals Convenor has made a determination on the 170 appeals lodged against the EPA's recommendation in its Report No. 1714 to approve a proposal by Main Roads Western Australia (MRWA) to construct the southern section of the Bunbury Outer Ring Road (BORR). You would also be aware that the Minister for Environment, the Hon Reece Whitby, in his letter accompanying the Appeals Convenor's report, has acknowledged that the proposal would have very significant, irreversible and long lasting environmental impacts (including on Ring-tailed Possums, 3 species of black cockatoos and 3 Threatened Ecological Communities). On this basis, the Hon Reece Whitby is proposing to convene with other Decision Makers (including yourself) to determine whether the project should proceed as proposed, or whether alternative routes for the proposed road should be investigated or reviewed.

It is in this context that I am writing to about the issues and impacts of this proposal that are relevant to your portfolio that you should consider in making a decision on whether the project should proceed as proposed, or whether alternative routes for the proposed road should be investigated, reviewed and adopted.

Having been involved in this process through personally authoring and writing a submission, visiting and surveying the site, and meeting with residents of the Gelorup corridor, I strongly recommend that the project should not proceed as proposed, and alternative routes for the proposed road should be investigated and reviewed, and a revised route adopted.

I make these recommendations for the following (non-environmental) reasons:

1. The proposed route is past its use-by date. The proposed corridor is very narrow and was designed for a much smaller regional route. Current needs are for a wider, faster route which the proposed route is not able to deliver because of environmental and social constraints.
2. The project and road design has been modified several times, including very recently, in which 4 grade-separated interchanges and bridges with have been replaced with roundabouts. Rather than reduce the travel time for light and heavy vehicle traffic around the Bunbury conurbation, the travel time and frustration will actually increase.
3. The cost of the project has increased by at least 40% since initially designed, in part through an increase in the cost of goods and services, but also because of the significant costs associated with intimated compulsory property acquisition or purchase, environmental management, mitigation and offset, which have only increased as a consequence of the Appeals Convenor's recently recommended increased requirements.

4. The project cost is no longer good value for money.
5. Alternative routes are available that are likely to have lower environmental and social impacts, and are likely to be cheaper, in part because of reduced property acquisition, environmental management, mitigation and offset requirements. These alternative routes traverse mainly already cleared farmland, and although there is likely to be some property severance, this could be handled sensitively and efficiently, as it was for the Forrest Highway several years ago.

Main Roads WA (MRWA) has considered some, but not all, of the potential routes, but has undertaken insufficient work to investigate these routes in sufficient detail to determine their merits. Nevertheless, the alternative route examined by MRWA in the greatest detail has the following distinct advantages over the currently proposed route:

- most (94.6%) of the vegetation is degraded or completely degraded
- it has much lower impacts on peri-urban areas and homeowners
- it is more future proofed in that there is more scope for widening of the road carriageway without significant additional impact
- some other route to the east of the proposed route will be needed at some time.

I submit that an alternative alignment is superior to the currently proposed alignment on numerous grounds, especially conservation of native vegetation, flora and fauna, and social impact. I also submit that the postulated impacts of an alternative alignment on property severance and farming efficiency could probably be much reduced or avoided or are much less significant than presumed if/once a full design of the road along the alternative alignment is properly investigated.

I submit that the following reasons for proceeding with the current alignment are not adequately sufficient and valid for not proceeding with an alternative alignment:

- the proposed alignment through Gelorup is historically zoned as Primary Regional Road in the Greater Bunbury Region Scheme
- adjacent residents were aware of the proposed route and impacts on their homes and property. This has not turned out to be the case, as the road initially designed was much larger, wider and had greater social impact than the road gazetted or planned under the Greater Bunbury Region Scheme
- MRWA has expended significant financial and other resources in designing the proposed alignment
- potentially increased construction costs because of a longer route.

Therefore, I submit that you should not proceed with the project as proposed, and you should recommend that alternative routes be investigated, reviewed and adopted.

I would be happy to meet you on site, with local residents, to discuss my comments and consider how and where to deliver the most environmentally sustainable, socially acceptable and economically affordable route to meet the objectives of a safe, efficient and beneficial transport corridor for light and heavy private and public transport needs.

Yours faithfully,
J.E. Wajon, PhD