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Hon Bill Johnston, Minister for Mines and Petroleum
Email: [http://Minister.Johnston@dpc.wa.gov.au](mailto:Minister.Johnston@dpc.wa.gov.au)

Bunbury Outer Ring Road (Southern Section)

Dear Mr Johnston

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 impacts on areas of significant basic raw materials.
2. The proposed alignment goes over a regional basalt deposit (the Bunbury or Gelorup Basalt) which is restricted to an ancient valley fill on the outskirts of Sunbury. The deposits are mined by several quarries owned by two companies, Hanson and Holcim. The deposits are protected by a 1km buffer zone under the Greater Sunbury Region Scheme and are predominantly surrounded by private rural land owners, except for special residential area to the west (Gelorup).
3. The proposed alignment of the road runs over the basalt deposit between two operational quarries and will result in between 7.22 million and 13.678 million tonnes of basalt being rendered unusable ("sterilised"). The Gelorup Basalt is typically valued at \$1 in the ground, \$18 once the overburden is cleared, the basalt rock blasted, transported to the crusher, crushed, screened and stockpiled. On leaving the quarry, transport costs are usually in the range of \$1 to \$2 per km travelled. As for all basic raw materials, the cost of transport is a significant component of the overall cost. The

Gelorup locality has the lowest production costs of all of the available sites of Bunbury basalt.

4. At its current delivered value of \$50 per tonne, the value of the sterilised basalt lost as a consequence of the proposed alignment of the BOOR Southern Section is between \$361 million and \$683 million. At current extraction rates, the sterilised basalt lost as a consequence of the proposed alignment of the BOOR Southern Section represents over 40 years of production that future generations cannot benefit from, and is contrary to the EP Act principle of intergenerational equity.
5. The Gelorup basalt is identified as a Strategic Geological Supply under State Planning Policy 2.4451, and is of particular significance to the State and the South-West Region as it is a near surface deposit with high and consistent quality and has good accessibility to the Greater Bunbury and South-West markets. Basalt is used for making concrete for buildings and footpaths, constructing roads and building seawalls for erosion protection and to protect communities and structures from the effects of climate change.
6. The loss of access to this resource a significant impact on both the economy and the environment, as alternative sites for hard rock will need to be found earlier than otherwise would be the case, resulting in additional environmental and social impact.
7. Alternative routes for the BOOR Southern Section are available that do not go over the Gelorup Basalt and do not result in loss of access to that resource. These alternative routes traverse mainly already cleared farmland.

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:

- it avoids the Gelorup Basalt deposit
- 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, including avoiding the basalt deposit, the conservation of native vegetation, flora and fauna, and social impact.

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
- 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