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**Report and Analysis
by the
Environmental Protection Authority
on
Farrington Road — North Lake**

**Consideration of Additional Information
arising from public submissions**



Department of Conservation and Environment
Perth, Western Australia
Bulletin 179 October, 1984

REPORT AND ANALYSIS

BY THE

ENVIRONMENTAL PROTECTION AUTHORITY

ON

FARRINGTON ROAD - NORTH LAKE

CONSIDERATION OF ADDITIONAL INFORMATION
ARISING FROM PUBLIC SUBMISSIONS

DEPARTMENT OF CONSERVATION AND ENVIRONMENT

PERTH, WESTERN AUSTRALIA

BULLETIN 179

OCTOBER, 1984

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CONCLUSIONS

The EPA has concluded that a number of factors have contributed to what is an unfortunate sequence of events. The contributing factors are listed below.

1. The System 6 Green Book did not have EPA status and many agencies have therefore not paid it the attention it deserved in their planning. It appears that the MRD assumed having made a submission on the Green Book, that the Red Book would automatically accommodate its views and requirements.
2. Cabinet's comment on the EPA System 6 Red Book was for recommendations to be "progressively implemented, as far as possible". This has been read by some agencies as meaning that the recommendations do not have Cabinet status until implemented.
3. The Authority and the Department of Conservation and Environment have endeavoured over a long period of time to obtain undertakings from Government Agencies on how environmental assessments would be handled and understood that they had done so from the MRD letter of 11 July, 1983. (Attachment B).

It is regrettable that the NOI was prepared and submitted 11 months after the MRD letter of July 11, 1983 and after Bicentennial Funds had been sought from the Commonwealth.

The Authority has stated before and states again that it believes that all State Government and semi-government agencies should be subject to the same levels of environmental assessment that are applied to private organisations.

4. The Minister for Transport, acting upon the advice of his Department, advised the Commonwealth on 26 July, 1983 (Attachment D and No. 8 of Appendix) that:

"I advise that in this submission there are no environmentally significant projects for referral to the Western Australian Department of Conservation and Environment or Environmental Protection Authority".

The attachment to that letter cited Farrington Road from Karel Avenue to Gilbertson Road as one of the five projects.

At the time that the letter was sent the two agencies named had not been consulted by the MRD on the Farrington Road proposal in the vicinity of North Lake.

5. The EPA sought consultation with the two Local Authorities involved. In their applications for Bicentennial Road Funds (incorporated in the NOI) both Local Authorities indicated their desire for the project and City of Melville afforded the construction of Farrington Road a higher priority at that time than City of Cockburn did.

Each Local Authority supplied letters to the MRD (Cockburn, 13 July 1984 and Melville, 19 July 1984) supporting the need for the road and both impressed this view on the EPA at meeting No. 327 attended by representatives of the Local Authorities and an officer of the MRD.

The EPA received the Local Authority Officers and the views that they put, in good faith.

6. The EPA believes that there is a need to establish a mechanism by which procedures for environmental assessments agreed between the DCE or EPA and certain Government agencies are followed, and that documents such as the Green Book and Red Book are taken into account in proposals affecting sensitive areas.
7. The EPA believes that prior to giving assurances to the Commonwealth on environmental matters, the MRD should ensure that it has written advice from the DCE or EPA.
8. It is desirable that copies of correspondence sent from the Minister for Transport to the Commonwealth indicating that there are no environmental impacts of projects should be routinely copied to the EPA for noting.
9. It has become evident that there is some confusion in the public arena as to the status of the System 6 Red Book recommendations and that public attention has focussed on the content of the report rather than the means of implementation of the recommendations. At present Cabinet's indication on the report is "approval of the progressive implementation, as far as possible, of the detailed recommendations in Part II."

10. The EPA believes that construction of Farrington Road as a four lane dual carriageway is inappropriate and believes that a single 7.4m carriageway only be constructed and that the management provisions proposed in Section 3.1.5 be implemented.
11. The EPA believes that provision of Farrington Road as a major through road for all vehicles is inappropriate and that this would result in social amenity problems. Steps should be taken to restrict the use of the road to certain vehicles only and trucks should be prevented from using Farrington Road as a through route.
12. The EPA concludes that it has received no additional information on this proposal that indicates that the construction and operation of Farrington Road in the form of a single 7.4m carriageway would have a detrimental effect on North Lake.

1. INTRODUCTION

This report arises as a result of a request from the Minister for the Environment for the EPA to review any additional or new information on the M93.3 Red Book recommendation on Farrington Road. (See No. 25 of Appendix) arising from a public review period which ended on 26 September, 1984.

The recent media coverage of the EPA's review of its System 6 recommendation on Farrington Road has taken the situation beyond that of just the environmental issues and into matters of procedure and the role of the EPA.

The major issues that now have to be considered are:

1. the physical environmental issues at North Lake itself, in particular any additional information arising from the submissions
2. the social environmental issues, particularly as they pertain to the local residents at Kardinya but also the broader public
3. perceptions of the role of the EPA
4. status of System 6 Red Book recommendations
5. how the situation arose and how similar situations may be prevented from arising in the future. This requires an examination of the environmental assessment procedures presently operating within the State between Government and semi-government agencies, local authorities and the Commonwealth where Commonwealth funding is involved.

2. BACKGROUND

2.1 Aspects of Bicentennial Funding

At a meeting held on 10 June, 1983 the MRD explained to officers of DCE some aspects of the Bicentennial road funds programme. The MRD said that the projects must satisfy certain criteria, in particular:

- (1) that the programme of works is not to include roads that are controversial
- (2) that projects are required to conform with the requirements of the state's environmental authority.

MRD indicated that it had already made a statement to the Commonwealth that the State Government will "bear the consequences of the works and they are expected to conform with the requirements of DCE".

At a later date DCE obtained the notes on the administration of the ABRD Trust Fund Act, as well as the Act itself. Section 3.8 of the notes states:

"When projects are submitted for approval, the States are required to certify that all works involved in the project conform with the requirements of the State's environmental authority.

A project will not normally be approved without this certification.

Until a project meets a State's environmental requirements, works on the project will be limited to hardship acquisition, investigation or such works as the State environmental authority is prepared to let proceed until all environmental requirements have been met.

The State should also advise whether particular projects submitted for approval are likely to have a significant effect on National Estate sites, Aboriginal lands and sacred sites."

Early in July, 1983 a representative of the Commonwealth Department of Transport visited DCE and stated that:

"specific and preferably unconditional approval is necessary from DCE".

No indications had been given by DCE or EPA on the environmental acceptability of the proposed construction of Farrington Road prior to the Minister for Transport making his statement to the Commonwealth, on the 26 July 1983, and indeed none was given until 27 August, 1984.

At a meeting held with MRD officers on 10 June, 1983 MRD indicated that 5 projects had already been decided (see Note to File, Attachment A), the projects were:

Hepburn Ave, Wanneroo (2 parts)
 Roe Street, N. Perth
 Farrington Road, Leeming
 Renwick Road Link, City of Canning
 Grindelford Road, City of Stirling

It is worth pointing out that Farrington Road Leeming runs from proposed Kwinana Freeway in the west to extension of Karel Ave in the east (see Metropolitan Street Directory) and any proposals by the Local Authorities or the MRD to include construction of the section around North Lake were not presented by the MRD at the meeting. The first consultations held to discuss the North Lake section were proposed by MRD and held on 25 May, 1984 after that agency discovered that the Red Book recommendation endorsed the earlier Green Book recommendation.

At the meeting on 10 June, 1983 DCE officers explained to the MRD that procedures at that time being devised for roads assessments indicated that special funded projects such as Bicentennial Funds would be subject to Notice of Intent and scrutiny by the EPA.

This approach was later confirmed by the Main Roads Department in its letter of July 11, 1983, (Page 2 second to last paragraph) see Attachment A. Although a Notice of Intent was prepared for the Farrington Road Project north of North Lake, this did not occur until after the 25 May, 1984 meeting with MRD. In fact the Minister for Transport advised the Commonwealth of the acceptability of the project within two weeks of the MRD agreeing that Bicentennial Projects that are environmentally significant would be subject to NOI, and without any environmental advice being given by DCE or EPA. The fact that the extensions north of North Lake could be environmentally significant enough to require a NOI is evidenced by the recommendations made in the Cockburn Wetlands Study and in the System 6 Green Book, both of which were available at the time that funding was sought from the Commonwealth in 1983.

2.2 Table Detailing Sequence of Actions

The sequence of actions by various agencies from 1976 to 1984 are detailed on the following table.

FARRINGTON ROAD - SUMMARY TABLE OF ACTIONS

(GREENBOOK REC. M93.7, REDBOOK REC. M93.3)

NOTE: Numbers in Brackets refer to attachment numbers in the Appendix to this report.

DATE	ACTION AGENCY				
	EPA	MRD	CITY OF MELVILLE	CITY OF COCKBURN	MURDOCH UNIVERSITY
<u>MARCH 1976</u>				Cockburn Wetlands Study Reports. This study was commissioned and endorsed by Cockburn. (1)	
<u>APRIL 1981</u>	System 6 Green Book endorses Cockburn Wetlands study recommendation on Farrington Road. (2)				
<u>11 SEPTEMBER 1981</u>			Submission on System 6 Green Book opposes recommendation on Farrington Road. L.A. desires construction (3)		
<u>11 NOVEMBER 1981</u>		Objects to wetland recommendation in Green Book - says Farrington Road necessary. (4)			

7.

EPA	MRD	CITY OF MELVILLE	CITY OF COCKBURN	MURDOCH UNIVERSITY
<u>17 NOVEMBER 1981</u>				Submission on System 6 Green Book opposes recommendation. L.A. desires construction. (5)
<u>23 JUNE 1983</u>				Agrees to alignment and to ceding of land for construction (6).
<u>22 JULY 1983</u>		Advises Minister for Transport that Melville and Cockburn desire Farrington Rd to be constructed using bi-centennial funds. (7).		
<u>26 JULY 1983</u>		Minister for Transport advises Commonwealth, seeks bicentennial funds and gives environmental assurances (8).		
<u>OCTOBER 1983</u>	EPA endorses wetland Green Book recommendation in the Red Book. (9).			
<u>MARCH 1984</u>	Cabinet accepts Red Book recommendations in principle: to be implemented as far as is practicable. (10,11)			

EPA

MRD

CITY OF MELVILLE

CITY OF COCKBURN

MURDOCH UNIVERSITY

Cabinet
releases
the Red Book
in May 1984.

25 MAY 1984

MRD contacts
DCE re Red Book
recommendation.
Indicates that
environmental
assurance has
already been
given by
Minister for
Transport in
July 1983. DCE
indicates EPA
would require
Notice of
Intent. (12).

19 JUNE 1984

MRD advises
EPA by Notice
of Intent of
construction of
Farrington Road
on changed
alignment. (13).

NOI includes
City of Melville
letter dated 23
February 1983,
requesting
Bicentennial
road funds for
Farrington
Road. (15.)

NOI includes
City of Cockburn
letter dated
14 February 1983
requesting
Bicentennial
road funds for
Farrington
Road. (14.)

EPA

MRD

CITY OF MELVILLE

CITY OF COCKBURN

MURDOCH UNIVERSITY

<p><u>28 JUNE 1984</u></p> <p>EPA No. 324 Members present: Prof A.R. MAIN Prof D. O'CONNOR Mr. A. GIBSON</p>	<p>EPA considers NOI at meeting No 324. EPA says NOI is inadequate and that more information is required. EPA writes to MRD. (16A,16B,16C)</p>				
<p><u>13 JULY 1984</u></p>				<p>Cockburn sends a strong letter to MRD stating need for road and giving assurances. (17).</p>	
<p><u>19 JULY 1984</u></p>			<p>Melville sends a strong letter to MRD stating need for road and general assurances. (18).</p>		
<p><u>31 JULY 1984</u></p>		<p>MRD advises EPA that it is a local authority road and that the local auth- orities should supply answers requested by EPA. (19).</p>			

EPA

MRD

CITY OF MELVILLE

CITY OF COCKBURN

MURDOCH UNIVERSITY

AUGUST 1984

EPA NO. 327.
 Those present:
 Prof A.R. MAIN
 Prof D. O'CONNOR
 Mr. A. GIBSON
 Mr. G. HACKETT
 (MRD)
 Dr. D. MIGUEL
 (COCKBURN)
 Mr. R. CANDY
 (COCKBURN)
 Mr J. TRELOAR
 (MELVILLE)

EPA meeting No. 327.
 EPA agrees it is
 not opposed to the
 construction of the
 road but that
 sufficient justifi-
 cation for the road
 was required and
 assurances on
 management issues. EPA
 meets MRD and the
 two L.A.s and
 receives the verbal
 assurances sought.
 Requests these be
 received in
 writing. (20A, 20B,
 20C).

16 AUGUST 1984

City of Cockburn
 writes to the
 EPA indicating
 that it is the
 constructing
 agency and
 giving the
 necessary
 assurances (21.)

23 AUGUST 1984

As the necessary
 conditions and
 assurances discussed
 at Meeting 324 and
 327 were given
 Chairman EPA makes
 executive decision
 and asks DCE to
 write to Cockburn
 on its behalf. (22).

EPA

MRD

CITY OF MELVILLE

CITY OF COCKBURN

MURDOCH UNIVERSITY

<u>27 AUGUST 1984</u>	DCE advises Cockburn on behalf of EPA that the project is environmentally acceptable. (22).				
<u>4 SEPTEMBER 1984</u>	Copy of letter to Cockburn sent to Melville attention Mr. J. TRELOAR. (23)				
<u>10 SEPTEMBER 1984</u>	Chairman EPA advises the Minister for the Environment of the EPA's advice and requests Cabinet endorsement. (24).				
<u>13 SEPTEMBER 1984</u>	Minister requests EPA to review any additional information that comes in from submissions, prior to reporting to Cabinet. (25).				

EPA

MRD

CITY OF MELVILLE

CITY OF COCKBURN

MURDOCH UNIVERSITY

20 SEPTEMBER
1984

EPA No. 330
Members present:
Prof A.R.MAIN
Prof D. O'CONNOR
Mr A. GIBSON

26 SEPTEMBER
1984

2 OCTOBER 1984

EPA No. 330
considers the
Minister's
letter (26).

Submission
period
ends

EPA meets to
finalise the
issue.

2.3 Main Roads Department Submission

The MRD submission stated that the reasons it gave assurances to the Commonwealth are as follows:

"In June 1983, MRD officers met with officers from DCE to advise them of the procedures being adopted for the local authority ABRD programme. These officers accepted that the approach was reasonable.

On July 26 1983, the Hon Minister for Transport, on the advice of the Commissioner of Main Roads, forwarded the recommended programme to the Commonwealth Minister for Transport. Because of the assurances given by the Melville City Council and the checks made with DCE officers, the following words were included in the letter:

"I advise that in this submission there are no environmentally significant projects for referral to the Western Australian Department of Conservation and Environment or Environmental Protection Authority."

A record of the meeting with MRD officers is attached (Attachment A) and the DCE not only denies that assurances were given but in fact states that it made recommendations as to the preparation of Notices of Intent for the projects. The fact that the MRD agreed to this latter approach is evident from their letter of 11 July, 1983 (Attachment B).

A Notice of Intent was not given to the EPA prior to the date of the Minister for Transport's letter of 26 July, 1983.

3. CONSIDERATION OF ISSUES RAISED IN PUBLIC SUBMISSIONS

As at 26 September, 1984 a total of 263 submissions had been received on the Farrington Road proposal. Almost all of these submissions were from people living in the immediate area of North Lake, Kardinya and Bibra Lake. Very few submissions were received from other parts of the metropolitan area.

A detailed summary of the submissions is presented in Attachment E. A list of names and addresses of individuals is also provided. Submissions fell into three main groups as below:

3.1 Submissions Opposing Construction of the Road

The main issues raised were:

- a) preservation of wetland and fringing vegetation
- b) preservation of habitat
- c) impact of clearing necessary for the road
- d) timing of construction in relation to animal breeding time and plants flowering
- e) risk of pollution/eutrophication of North Lake including from run off and vehicle spills.
- f) wildlife issues
- g) invasion by weeds and risk of fire
- h) risk of introduction of *Phytophthora cinnamoni*
- i) Aboriginal sites
- j) safety issues for children
- k) M.R.S. Parks and Recreation reserve considerations such as increased access and possible problems of rubbish dumping, trail-bike riding and wood cutting to east of North Lake
- l) road network considerations
- m) requirements of Bicentennial road funding for projects. (See Sections 2.1 and 3.1.6)
- n) issues pertaining specifically to the Murdoch University land

- o) effect of change in rate of drainage on water table level.
- p) disposal of stormwater from road pavement
- q) road construction options such as a single rather than a dual carriageway, modification of alignment
- r) noise from traffic
- s) pollution by lights(to area of Murdoch campus used for astronomy)
- t) loss of amenity in MRS reserve
- u) desire for an ERMP
- v) desire to have an inquiry under Section 37 and Section 43 of the Environmental Protection Act
- w) annoyance at the EPA reviewing its recommendation
- x) loss of one of Perths "few remaining wetlands"
- y) suggestions for management of Farrington Road.

3.1.1 Consideration of the Above Issues by the EPA

The EPA gave general consideration to the above points when it determined that the road could be constructed and used without having a detrimental impact on North Lake. The proponents had made certain modifications to the road design and to the location of the road reserve (ie further away from North Lake) since the information presented in the System 6 report.

In determining that the road would not have a detrimental impact the EPA took account of the wetland issues in points a, b, c, f, g, j, l, o, p, q, r, t and x. Other points are discussed separately later.

In consideration of timing of construction (point d) the Authority was not in a position to influence this. The Authority agrees that the construction of the road during the sensitive breeding time for many species is unfortunate, however the time table was already decided between the Local Authorities, the MRD and the Commonwealth and contracts were about to be let. Those agencies determined the timing for construction without consultation with any environmental agency such as DCE or EPA, Fisheries and Wildlife or environmental consultants.

3.1.2 Vehicle Spills

The Authority expressed concern at the risk of vehicle spills (point e) and has received assurances from the Local Authorities on how this will be handled if it occurs. The Authority believes that in principle a more appropriate approach may be to prevent the problem by applying restrictions to the types of vehicles that may use roads adjacent to wetlands. However, the Authority is also cognisant of the fact that historically in Perth many roads (including Freeways) have been constructed across or very close to wetlands and that in some instances this approach may not be practical.

In the case of North Lake, the Authority believes that heavy truck traffic could be excluded from using the road as a means of removing risk from vehicle spills and reducing noise impacts.

3.1.3 Phytophthora cinnamomi

The Authority did not consider issues relating to Phytophthora cinnamomi (point h) when it considered the road proposal north of North Lake because the alignment had already been cleared in this area. Conditions on washdown of vehicles used on clearing work are normally incorporated in the contracts that agencies make with the contractors.

3.1.4 Unity of Eastern Chain of Cockburn Wetlands

Some submissions were concerned that construction of Farrington Road would result in loss of unity in the eastern chain of wetlands and dislocation of the regional open space (points a, c, k).

The Authority considered these points prior to reviewing its System 6 recommendation. The Authority believes that the impact of construction and operation of a road adjacent to the boundary of the M.R.S. Parks and Recreation Reserve in the north will have no significant effects on the unity of the eastern chain of wetlands or on the reserve. The Authority is of the opinion that a bisection of the wetland chain has already occurred because of the construction of Forrest Road. The proposed Roe Highway alignment is of more significance to the management of the area.

3.1.5 Management of Farrington Road

The Authority discussed aspects of management with the Local Authorities. City of Cockburn has recognised the importance of North Lake in its letter of 16 August, 1984. (No. 21 of Appendix) and has stated "The City of Cockburn is aware of the environmental significance of North Lake and are prepared to ensure that the wetland area of North Lake is unaffected by the construction and presence of Farrington Road."

The Local Authority (Cockburn) has given its assurances that it will manage the road so that no detrimental impacts result.

Several submissions addressed suggestions for management. The Kardinya Residents Association provided the following suggestions:

- " 1) The section of Farrington Road between Murdoch Drive and North Lake Road should remain a single 7.4m carriageway to rural design standards as presently proposed.
- 2) The second carriageway should be permanently deleted and the road reserve should be reduced to the 12m width, and the area freed replanted with native species local to this area.
- 3) No street lighting should be installed between Gilbertson Road and Bibra Drive along Farrington Road because this will adversely affect the fauna in the Regional Open Space.
- 4) Trucks should be prohibited from using the Farrington Road extension as they will devastate the wildlife and introduce noise pollution into the area, disturbing residents and nesting birds.
- 5) The road verges should be rehabilitated with local flora. We are willing to assist with the project.
- 6) The road should be fenced where it passes through the woodlands and wetlands to prevent off-road vehicles from further damaging the important natural ecosystem.
- 7) A 40 kilometre per hour speed limit should be imposed along the stretch of Farrington Road which passes through the Regional Open Space, to protect the wildlife, as in King's Park.
- 8) The contractor has filled two important drains which feed North Lake and prevent it from drying out in the summer. These lie adjacent to Maritime Avenue, Kardinya, and to the Murdoch Veterinary School. These drains should be re-opened immediately as waste water is backing up and any permanent blockage of them will adversely affect the ecology of the lake. "

Several of these points would undoubtedly improve the social environment for people living close to the road, and the Local Authorities should give consideration to adopting all or some of the suggestions.

The W.A. Wildlife Authority has also indicated concern over restricted access for wildlife therefore the EPA recommends that consideration should be given to the adoption of such measures as may be appropriate to allow free movement of wildlife and to prevent access to the carriageways of Farrington Road and Bibra Drive by wildlife. The constructing authority should liaise with the Department of Fisheries and Wildlife on this matter.

The EPA also recommends that consideration should be given to the adoption of such measures as may be appropriate to prevent traffic from pulling off the carriageways of these roads to gain uncontrolled access to the fringing bush and wetlands in the area.

3.1.6 Aspects of Bicentennial Funding (point m)

This issue has been addressed at length earlier in this report. (Section 2.1)

It is evident to the Authority that the MRD did not follow its procedures as communicated to the DCE on 11 July, 1983 by MRD (Attachment B). The Authority has stated before, and states again that it believes that all State Government and semi-government agencies should be subject to the same levels of environmental assessment that are applied to private organisations.

3.1.7 Murdoch University Land Issues (points n + s particularly)

Submissions from students of Murdoch University and the School of Environmental and Life Sciences addressed certain issues relating to the Murdoch University land.

These issues included loss of study area on the Murdoch land ceded, preservation of jarrah-banksia woodland on the southern boundary of the university land, risk of Phytophthora in that area and introduction of pollution by lights (disturbance from vehicle headlamps) into an area of the campus presently used for astronomy observations.

The System 6 Red Book proposal included "part of Reserve C31968, for University Site, also not vested but the subject of a Crown Grant in Trust to the Murdoch University Planning Board" (p. 282).

At the time that the University ceded the land (23 June, 1983) the EPA Red Book was being prepared. However, the System 6 Green Book had been available since 1981 and it was expected that agencies would take the recommendations of that report into account and liaise with the DCE if proposals were to have an impact on an area of a System 6 recommendation.

At the time that the EPA was consulted in June, 1984, the University had already ceded the land and all constructing and financing approvals for Farrington Road had been obtained.

3.1.8 Aboriginal Sites (point i)

Several submissions raised the issue of Aboriginal sites

In his letter of 26 July, 1983 (document 8 of Appendix), the Minister for Transport gave his assurance that "the project would not have any adverse effect on sites listed in the register of the National Estate and are unlikely to have any significant effect on Aboriginal Lands or sacred sites".

The EPA does not have responsibility for this matter although it attempts to ensure that necessary investigations for Aboriginal and other heritage issues are carried out by proponents or their consultants. In particular the Authority has indicated to the Main Roads Department (via the Department of Conservation and Environment) that the responsibility for obtaining clearances from the W.A. Museum rests with the MRD and that agency frequently employs consultants in this area.

The responsibility for ensuring that Aboriginal sites are dealt with properly clearly rests with the planning and construction agencies, in direct liaison with the Museum.

3.1.9 Call for ERMP (point u)

Many submissions expressed the view that work should cease on the project while an ERMP is prepared

The EPA has no powers that enable it to halt construction projects. The Authority does not believe that the System 6 recommendation requires consideration in an ERMP in this case.

3.1.10 Call for Inquiry (point v)

Several submissions sought to have an Appeal heard under Section 43 of the Environmental Protection Act or sought a Public Inquiry under Sections 37 and 43 of the Act.

Sections 37 and 43 of the Environmental Protection Act provide for inquiries to be held in relation to declaration of an environmental protection policy. The actions of EPA on the Farrington Road proposal involved no declaration of policy and consequently these Sections of the Act and the holding of an inquiry are not relevant to this issue.

3.1.11 Annoyance at EPA reviewing its System 6 Recommendation (point w)

The EPA acknowledges that some people will feel aggrieved at the Authority for reviewing its recommendation.

The Authority is also concerned that there is some annoyance in the community resulting from people discovering that the EPA does not have decision-making powers or indeed any of the powers that many members of the public thought lay with the Authority.

The EPA has always been an advisory body on environmental matters and has relied on persuasion and co-operation to achieve environmental protection in this State.

The EPA formulates its recommendations by consideration of objective and subjective information in the scientific and social areas. The Authority has never been subject to direction by the Government of the day.

3.1.12 Gazetted Rare Flora

One submission stated that there are two declared rare plants Dodonea hackettiana and Diuris purdiei in the vicinity of the route of the proposed roads (ie Farrington Road and Bibra Drive). The submission did not state whether these plants would be directly affected by the roads.

The submission from W.A. Wildlife Authority stated:

"In terms of the flora, the inspection indicated that no plant gazetted as rare and in need of special protection will be taken or affected by the construction".

3.2 Submissions supporting the road

Submissions that supported the road considered the following issues:

- a) Cockburn City Council had undertaken contractual obligations and therefore did not have the option to terminate the work programme without incurring serious consequences in terms of financial losses and damage to reputation.
- b) the possibility of Cockburn taking action against authorities which gave approval to the construction of the road
- c) the EPA advice should not be altered "in the heat of the moment"
- d) the decisions to construct the road should not be altered "in the heat of the moment"
- e) the debate has been distorted to suit the needs of a relatively small group of residents in Kardinya. Nearby residents will benefit (Coolbellup, Leeming and Bibra Lake) from construction of Farrington Road. The Government is ignoring their views and needs.
- f) Construction of Farrington Road is important to provide access to facilities and safety to the communities at Bibra Lake and surrounding suburbs
- g) Farrington Road is only a land values issue for people living near to it
- h) Kardinya residents moved into the area in the knowledge that the road was planned because it was on existing maps
- i) Hope Road should not be upgraded in lieu of constructing Farrington Road. Wildlife and humans are already being killed crossing it
- j) Proposed development of Roe Highway is more of an environmental threat than Farrington Road.
- k) Constructing Farrington Road and making Hope Road into a cul-de-sac would protect the lakes in an area closed from traffic
- l) Bibra Lake is more important than North Lake as it is bigger and keeps the other lakes stocked with wildlife.

3.3 Submissions addressing the Decision-making process

A number of submissions made observations on the decision-making process. These points/criticisms are summarised below:

- a) no significance has been attached to the System 6 recommendation (or its reversal) or to the Cockburn wetlands study
- b) blatant, callous disregard for the views of the broader community
- c) no public comment sought on the decision
- d) the residents of Kardinya and conservationists were under the impression that Farrington Road would not be built because of the System 6 Red Book recommendation and information given to them by the City of Melville when they moved to the area
- e) there has been no environmental assessment beyond the preparation of a Notice of Intent by MRD
- f) desire to have an ERMP produced or other (unspecified) review of the EPA's advice
- g) misleading information has been given to the Commonwealth Authorities and Ministers
- h) improper use of Bicentennial road fund as the project is not environmentally sound
- i) waste of ratepayers/taxpayers money
- j) EPA has not done its duty under Sections 28 and 29 of the Environmental Protection Act, and/or implied by its name
- k) Local Authorities should not dictate policy to the State Government and/or its agencies.

4. PERCEPTIONS OF THE ROLE OF THE EPA

From the media coverage of the Farrington Road issue and from some of the submissions received it has become evident that the role of the EPA is still not understood and that people have expectations of the Authority which cannot be fulfilled.

The EPA was established under the Environmental Protection Act (1971 - 1980) to carry out duties as described in Section 30 of the Act. Contrary to some opinions which have been expressed, the Authority is not a decision-making body and it has no legislative powers which enable it to prevent development or to stop work in instances such as Farrington Road.

The EPA is an advisory body which reports to its Minister, and which may provide advice from time to time directly to proponents, the Government or other Ministers.

The Authority considers scientific and social information pertaining to the environmental impact of proposals. It takes account of both objective and subjective information (such as public opinion and aesthetics) and provides its advice. Because of the subjective nature of some of the information, the advice of the Authority will not necessarily please everybody, however the Authority remains consistent in its stance as an independent advisory authority and gives its best advice and technical environmental recommendations.

The Government is free to decide whether to accept or reject the advice of the Authority and in doing so may take account of other considerations.

Some submissions have made specific accusations that the Authority has not complied with its Act, particularly Sections 28 and 29. The Authority believes that it has complied with these Sections and it is of the opinion that the conservation values of North Lake can be maintained and that Farrington Road can be built and operated as long as close attention is paid to management of construction and operational impacts.

Other submissions requested an Appeal or called for an Inquiry under Sections 37 and/or 43 of the Act. Sections 37 and 43 of the Act provide for inquiries to be held in relation to a declaration of environmental protection policy. The actions of EPA on the Farrington Road proposal involved no declaration of policy and consequently these sections of the Act and the holding of an inquiry are not relevant to this issue.

The Authority believes that the level of assessment carried out on this project was sufficient to allow it to make a recommendation.

From the EPA letter sent to MRD (Attachment C) it can be seen that the Authority considered that there were shortcomings in the Notice of Intent prepared by MRD. Subsequently, the Authority sought additional information from the MRD, Local Authorities and the DCE, via consultation.

5. STATUS OF THE SYSTEM 6 RED BOOK

Part I of the System 6 Red Book contains the following statement:

"On 19th March, 1984 State Cabinet accepted in principle Part I of this report and approved of the progressive implementation, as far as possible, of the detailed recommendations in Part II".

The EPA's understanding is that this statement was incorporated in the document as a result of a Cabinet decision on the Red Book.

The EPA believes that it has operated within the context of the statement on the Farrington Road issue and in accordance with the intentions of Cabinet.

6. REFERENCES

The Darling System, Western Australia, Proposals for

Parks and Reserves: The System 6 Study Report
to the Environmental Protection Authority,
1981.

Department of Conservation and Environment
Report No. 8, April, 1981 (System 6 Green Book).

Environmental Protection Authority, 1983, Conservation

Reserves for Western Australia as recommended
by the Environmental Protection Authority - 1983,
The Darling System - System 6, Parts I and II:
Department of Conservation and Environment
Report No. 13, October, 1983. (System 6 Red Book).

7. GLOSSARY

DCE	Department of Conservation and Environment
EPA	Environmental Protection Authority
ERMP	Environmental Review and Management Programme
Green Book	Specifically for System 6 this was a report prepared by a complex committee system which identified areas of conservation value and attempted to reconcile proposals for their reservation and protection with the need to provide for other competing uses.
L.A.	Local Authority(ies)
MRD	Main Road Department
NOI	Notice of Intent
Red Book	A report put out by EPA following consideration of a Green Book and public review.
System 6	The Conservation Through Reserves Committee (CTRC) proposed 12 systems for the State each representing a natural and demographic entity. System 6 was designated as being the Darling System which forms the hinterland of Perth.

1. Esperance - Twilight Beach Road/Eleven Mile Beach Road (see Annette van Steveninck)
2. Esperance - Bandy Creek Road (see Annette)
3. Derby-Cone Bay Road was considered controversial (George Hackett said that DCE coastal management people are "fully aware" of this. I have checked with Colin Chalmers who spoke with Bruce and he had asked that it be referred by letter to DCE). It has not been received, to date.
4. Realignment of Cossack Road and Hirson Cove Road (talk to Charlie Nicholson) are problems because they are not on declared road reserves)
5. Busselton-Geographe Bay road deviation

Borrow pits created during bicentennial funds projects can be rehabilitated using the funds. However the funds cannot be used for existing borrow pits. Bicentennial works will have signs erected to identify the funding.

Urban Arterial

These proposals had to make use of the existing arterial system. Local Authority projects submitted totalled \$96 million and \$9.3 million is available for allocation.

Projects not already in the MRS were excluded. Five projects have been decided, they are:

Hepburn Road, Wanneroo (2 parts)
 Roe Street (N Perth)
 Farrington Road, Leeming
 Renwick Road Link (City of Canning)
 Grindleford Road (City of Stirling)

The balance of the funds will be spent on projects to be selected from 9 suitable ones.

The Grindleford Road project involves a wetland between Karrinyup Road and Wanneroo Road. MRD has told City of Stirling to consult with DCE direct.

DCE gave no indications at the meeting of whether these projects are acceptable. MRD gave no indications of the criteria used by them to identify environmentally sensitive projects.

Norman asked Mr Hackett to write to DCE detailing his objections to the Environmental note produced for assessments (see attached).

The procedures at present being devised for roads assessments (also attached) indicate that special funded projects, such as bicentennial funds would be subject to NOI. This needs to be resolved between senior officers of DCE and MRD.

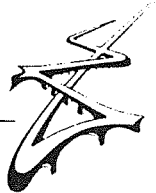
Sally Robinson

Sally Robinson
 ENVIRONMENTAL OFFICER

23 June 1983

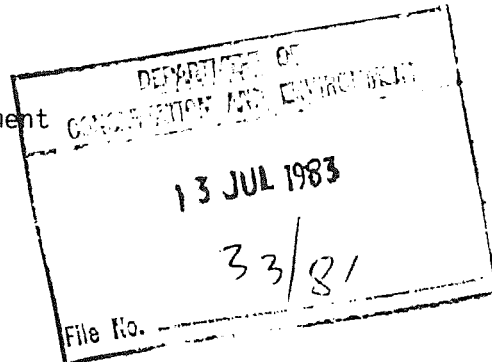
MAIN ROADS DEPARTMENT

WATERLOO CRESCENT, EAST PERTH, WESTERN AUSTRALIA
G.P.O. Box X2255 PERTH 6001 W.A. Telephone 323 4111 Telex AA 92984



Enquiries Mr. Hackett on 323 4317
Our Ref. 85/152
Your Ref.

Director
Department of Conservation & Environment
1 Mount Street
PERTH WA 6000



PROJECT ASSESSMENT
REFERRAL PROCEDURES

I refer to the recent discussions between Messrs Viol and Hackett concerning project assessment of Main Roads Department works.

The assessment of projects in advance of the approved annual works programme can only be done on the basis that the project is under consideration for programming. It should be clearly understood that any such assessment shall remain confidential, within concerned Government Departments and Authorities, unless this Department indicates otherwise.

Subject to the above proviso the Department proposes the following procedures:-

Advance Projects

- Step 1 - MRD will review projects that are under active consideration for programming and identify environmentally significant projects. If possible an appropriate timescale for subsequent procedures will be identified.
- Step 2 - DCE may review the list of potential projects on an officer to officer basis, if considered necessary. DCE will assist MRD in determining guidelines that will define factors of environmental significance.
- Step 3 - MRD will prepare an internal planning report on the significant projects and assess the environmental impact of these projects.
- Step 4 - DCE will provide assistance to identify significant issues, on an officer to officer basis, for MRD's assessment and inclusion in the planning report.
- Step 5 - MRD will obtain internal acceptance of the planning report and formally submit to DCE for comment.

...2/

22/10

- Step 6 - DCE will
- i) indicate acceptance of the report.
 - ii) identify additional issues and refer back to MRD.
- Step 7 -
- i) If DCE accepts the report MRD will refer details to the MRD Design Branch.
 - ii) If DCE identifies additional issues, the assessment will revert back to Step 3 with the MRD producing either an amended report or an addendum to the original report.

On the completion of steps 1 to 7 the project would normally proceed to the design phase within MRD. Steps 1 - 7 may require to be repeated if:-

- a) the design results in significant changes to the planning concept.
- b) significant environmental issues need to be resolved during the design phase.

Referral to EPA

At Step 6 DCE may in certain circumstances refer the report to EPA. For instance this could occur when the issues are complex or when interpretations of Commonwealth/State assessments require clarification. The EPA may:-

- i) indicate acceptance of the report
- ii) seek further information
- iii) ask for the preparation of a NOI

With regard to (ii) and (iii) DCE will provide advice to MRD on EPA's requirements and where an NOI is requested DCE will provide advice to MRD on its preparation. It is accepted that when a NOI is requested EPA's assessment procedures will be followed.

For all National Highways and Commonwealth funded roads of environmental significance a NOI will be required.

Road works to be funded by extraordinary Commonwealth funding of an interim nature (e.g. Bicentennial Roads) which are environmentally significant will require a NOI.

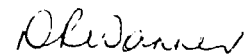
Once the annual programme of works is defined, all projects will be assessed as follows:-

Annual Programme

- Step 1 - MRD will assess all projects in accordance with the MRD manual. DCE will assist MRD regarding the content and procedure contained in the manual.
- Step 2 - MRD will review internal assessments and accept all projects where the environmental effect is not considered significant.
- Where significant effects are identified brief details of the project and the effects will be submitted to DCE.
- Step 3 - DCE will review projects submitted and where previous reporting has been undertaken will indicate acceptance or otherwise of the project.
- Where new effects are identified that have not been previously reported upon then DCE will consult with MRD at officer to officer level, and then advise level of reporting required.
- Step 4 - MRD will proceed with projects that have been accepted and will liaise with DCE on other projects until acceptance is obtained.

It is believed that the above procedures will enable our Departments to fulfill our respective responsibilities. It will be important for officers of both Departments to be able to freely discuss the projects and to provide the necessary assistance to ensure the procedures work with the minimum of formality.

I trust these proposals meet with your approval.



D R Warner
SECRETARY

July 11 1983



ENVIRONMENTAL PROTECTION AUTHORITY

BP HOUSE,
1 MOUNT STREET, PERTH, WESTERN AUSTRALIA 6000

Telephone 322 2477

ATTACHMENT C

EPA ADVICE TO MRD

29 JUNE 1984

COMMISSIONER FOR MAIN ROADS

Your Ref.

Our Ref. 102/83 V2

SYSTEM 6 RED BOOK RECOMMENDATION M93.3
FARRINGTON ROAD, NORTH LAKE - NOTICE OF INTENT

The Environmental Protection Authority considered the Notice of Intent on the above matter at its meeting held on 28 June 1984.

It is regrettable that the environmental aspects of this proposal were not taken into account before assurances had been given to the Commonwealth and before a portion of the alignment was cleared.

In the light of the fact that the area is covered by a Red Book recommendation, the EPA will require:

- a) a strong argument for why the road is needed. This should include statements from Murdoch University on their latest plans for the campus which are again under review, and a statement from Cockburn Council giving the reasons why they now see Farrington Road as desirable, in contradiction of the study they commissioned.
- b) an adequate demonstration of what the existing environment is, including aspects such as access to the lake.
- c) details of the special precautions that will be taken to preserve the area of the Red Book recommendation that will remain at the end of construction. Impacts during construction and on-going management aspects should be addressed, including potential siltation in or close to the lake, damage to vegetation around the lake margin, disposal of stormwater, means of handling spillages of hazardous chemicals on the road, and social impacts such as noise and loss of amenity of the open space.

- d) examine the impact on the proposed road network in the local area if Farrington Road is not completed and provide a map showing what alternative practicable network might result.

As no justification for construction of the road has been provided to the EPA, the Authority is unable to modify its recommendation on the basis of the present Notice of Intent. However, it will be willing to examine the matter further when the issues identified above have been adequately addressed.


A R MAIN
CHAIRMAN

29 June 1984



MINISTER FOR TRANSPORT, AND
REGIONAL DEVELOPMENT AND THE NORTH WEST
WITH SPECIAL RESPONSIBILITY FOR "BUNBURY 2000"

ATTACHMENT D
LETTER FROM MINISTER FOR
TRANSPORT TO COMMONWEALTH

26 JULY, 1983

26th July, 1983.

Hon. P. F. Morris, M.P.,
Minister for Transport,
Parliament House,
CANBERRA A.C.T. 2600

Dear Mr. Morris,

Programmes have previously been submitted for the major Urban Arterial Road projects and the urban public transport component of the Australian Bicentennial Road Development programme.

Details are now submitted for the balance of the programme which is for arterial roads nominated by local authorities. The programme comprises five projects which will commence in 1983/84. It is not yet possible to submit the entire programme because some aspects still have to be reviewed. However, a list of projects is attached from which the programme for the final years will be selected.

A number of projects listed require amendments to the declared urban arterial road network and a submission has already been forwarded to the Department of Transport.

I advise that in this submission there are no environmentally significant projects for referral to the Western Australian Department of Conservation and Environment or Environmental Protection Authority. I also advise that none of the projects would have any adverse effect on sites listed in the register of the National estate and are unlikely to have any significant effect on Aboriginal Lands or sacred sites.

I seek your approval to the five projects listed.

Yours sincerely,

J. F. GRILL
MINISTER FOR TRANSPORT

EXPLANATION OF CATEGORIES USED IN SUMMARY OF SUBMISSIONS
OPPOSING ROAD

- A. General conservation value of North Lake, surrounding wetlands and bushland, (including comments relating to the importance of the area to the integrity of the regional ecosystem or as part of the eastern chain of the Cockburn wetlands, the fact that wetlands and/or natural bushland areas are a rapidly dwindling resource in the metropolitan area, the need to preserve all remaining wetlands and/or natural areas, the particular importance of natural uncosmeticised wetlands.)
- B. Present generations responsibility to preserve natural and wetland areas for future generations, and/or Australia's international responsibility to preserve natural habitats.
- C. Passive recreation, (including informal education) and/or amenity and/or aesthetic value of North Lake and surrounding wetlands and bushland, (including comments relating to the peace and tranquillity of the natural surroundings, the existence of the lake and surroundings being a major attraction of living in the adjacent residential areas, the opportunity the area gave to children to grow up with a knowledge and appreciation of the natural environment, the enjoyment gained from walking, observing nature, listening to birds, photography, painting etc.)
- D. Study and research value of North Lake and surrounding wetlands and bushland to Murdoch University students, school students and naturalists, (including comments relating to the adverse impact the road will have on areas of Murdoch University used for astronomy because of light pollution).
- E. Progress versus the environment, (including comments relating to the preservation of wetlands being worth the slight inconvenience of relocating a road, the conceding of valuable natural areas to the "metal god", the car, destruction of another wetland area just to suit the selfish lifestyles of people, barbaric man conquering nature).
- F. Environmental impact of road generally on North Lake and surrounding wetlands and bushland.
- G. Effects on flora and fauna by clearing for construction of road, (including concern at the timing of the construction during sensitive breeding time of wildlife and flowering time of plants).
- H. Destruction of swamplands or Roe Swamp in particular.
- I. Degradation, disturbance of Banksia woodland to south of Murdoch University campus.

- J. Effects of road through the area on flora and fauna, (including comments relating to the destruction and disturbance of habitats and breeding grounds, disruption of established movement patterns of wildlife, reduction in numbers and species diversity, extinction of rare or endangered species of wildlife, destruction of declared rare plants).
- K. Disturbance of Aboriginal sites.
- L. Pollution and other alterations to the environment, (including comments relating to the effects of change in the rate of drainage on hydrological balance/ water table levels, pollution from storm water drainage, vehicle emissions, vehicle noise, increased invasion of weeds and feral animals, increased risk of fire, risk of introduction of Phytophthora cinnamomi, risk of eutrophication of North Lake, impacts of increased accessibility such as increased littering, dumping of rubbish, vandalism, trail bike riding and woodcutting).
- M. Impact of road on amenity and safety of Kardinya residents, particularly children, (for example: road will deny children safe access to North Lake and surrounds, increased traffic noise and car head lights in house windows).
- N. Construction of Farrington Road not justified on basis of existing and proposed roads in area, (includes issues such as: construction of Roe Freeway making Farrington Road obsolete/redundant, area already well serviced by major roads, no rationale for road at all particularly a dual carriageway, suggestions for alternatives to construction of Farrington Road).
- O. Less environmentally damaging road construction/ alignment options, (including comments relating to suggested modifications of alignment or use of special construction techniques to lessen environmental impact, the fact that the road will be a dual carriageway rather than a single carriageway, rural-type road).
- P. Proposed Roe Freeway is a further threat to North Lake environment.
- Q. Recommendations of System 6 Report and/or Cockburn Wetlands Study, (including comments relating to the reversal of these recommendations by the EPA, the failure to attach any significance to the recommendations/findings of these reports, the fact that System 6 recommendations led residents, students and conservationists to believe that the road would not be built, and that System 6 recommendations indicate that the EPA is well aware of the value of North Lake and surrounding wetlands and bushland).

- R. No consideration of the views of the community in the decision to build road and decision to reverse System 6 recommendation.
- S. Responsibilities of the EPA and proper environmental assessment procedures, (including comments relating to the lack of any environmental assessment beyond the preparation of a Notice of Intent by the Main Roads Department, desire to have an Environmental Review and Management Programme or other unspecified review of the decision, failure of the EPA to fulfil its duties under Sections 28 and 29 of the Environmental Protection Act or implied by its name.
- T. Use of Bicentennial Funding, (including comments relating to the use of Bicentennial Funding for a road that is unnecessary and environmentally damaging, the giving of misleading information to Commonwealth Government Ministers and Authorities in this regard, the consequent waste of taxpayers and ratepayers money).
- U. The role of the Local Authority, (including comments relating to the undesirability of Local Authorities being able to dictate policy to the State Government and its agencies, Cockburn City Council actions demonstrating that it is a responsible body for the management of the Farrington Road project).

SUMMARY OF SUBMISSIONS OPPOSING CONSTRUCTION OF
FARRINGTON ROAD (AND/OR BIBRA DRIVE) EXTENSION

Submission
Number

Issues Raised

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	
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Submission
Number

Issues Raised

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57	*					*									*						

Submission
Number

Issues Raised

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
58	*	*				*		*	*	*				*			*		*	*	
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86	*				*			*		*		*					*	*			

Submission
Number

Issues Raised

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
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113	*				*																
114	*		*	*								*						*			

Submission
Number

Issues Raised

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U
115	*																				
116	*					*															
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EXPLANATION OF CATEGORIES USED IN SUMMARY OF SUBMISSIONS
IN FAVOUR OF ROAD

- A. Consequences of terminating work programme, (including comments relating to the fact that Cockburn City Council had undertaken contractual obligations and therefore did not have option to terminate work programme without incurring serious consequences in terms of financial losses and damage to reputation, and the possibility of Cockburn taking action against Authorities which originally gave approval to construction of the road).
- B. Carefully considered decisions should not be altered in the "heat of the moment".
- C. Distortion of Debate/Needs of community of Bibra Lake and surrounding suburbs, (including comments that the debate had been distorted to suit needs of relatively small and greedy group of residents in Kardinya, the construction of Farrington Road was important in terms of access to facilities and safety for the communities of Coolbellup, Leeming and Bibra Lake, the Government had ignored the needs of residents of these suburbs, and that Farrington Road was really just a land values issue).
- D. Kardinya residents moved into area in the knowledge that the road was planned because it was on existing maps.
- E. Hope Road should not be upgraded in lieu of constructing Farrington Road, (including comments that humans had already been killed crossing Hope Road, that a major road between Bibra and North Lake would destroy their unity, and that making Hope Road a cul-de-sac and constructing Farrington Road would protect Bibra and North Lakes in an area closed from traffic).
- F. Proposed Roe Freeway is more of an environmental threat than construction of Farrington Road.
- G. Bibra Lake is more important than North Lake as it is bigger and keeps other lakes stocked with wildlife.

SUMMARY OF SUBMISSIONS IN FAVOUR OF FARRINGTON ROAD

Submission No.	Issues Raised						
	A	B	C	D	E	F	G
29			*	*	*		*
84	*	*					
145			*				

Total submissions in favour : 3

ATTACHMENT E - SUMMARY OF PUBLIC SUBMISSIONS

List of Names and Addresses of People/Agencies
making submissions

Total Number of Submissions: 256

Note: Reference numbers of submissions bear no relation to numbers in summary table of submissions.

N. AINSHI

J. ALLEN
12 MIRANDA COURT
COOLBELLUP

W. ANDERSON
1 ARNOLD CRESCENT
NORTH LAKE

M. ARCUS
33 VAHLAND AVE.,
RIVERTON

M. ARMSTRONG
68 PERIWINKLE WAY
PARKWOOD

L. ARNOTT
12/40 ALEXANDRA ROAD
EAST FREMANTLE

AGRICULTURAL AND WILDLIFE ASSOCIATION
203 ROCKINGHAM ROAD
HAMILTON HILL

M. BAMFORD
SCHOOL OF ENVIRONMENTAL AND LIFE SCIENCES
MURDOCH UNIVERSITY
MURDOCH

H. BARNES
4 JILLIAN STREET
RIVERTON

MRS. J. BECU
7 STONE COURT
KARDINYA

MR. P. BECU
7 STONE COURT
KARDINYA

MR. M. BEESON
111 CANTERBURY TCE
EAST VICTORIA PARK

R. BELLANGER
VILLA 474
31 WILLIAMS ROAD
NEDLANDS

F. BLANKSBY
83 GILBERTSON ROAD
KARDINYA

S. BOOTH
9 HOGARTH WAY
BATEMAN

P. BOURGAULT
51 KEANE STREET
MT. HELENA

H. BOURKAERT
1/18 ALFRED ROAD
NORTH FREMANTLE

K. BOYD
32 RAYMENT STREET
LATHLAIN PARK

D. BRADY
5 MYRA PLACE
SHELLEY

C. BRANCHETTI
9 STONE COURT
KARDINYA

H. BRANCHETTI
9 STONE COURT
KARDINYA

S. BRASH
193 HENSMAN ROAD
SHENTON PARK

J. BREADMORE
5 CANARY PLACE
KARDINYA

E. BUGHA
10-B OCHILTREE WAY
KARDINYA

J. BULLOCK
7 CANARY PLACE
KARDINYA

F. CAHILL
2 CANARY PLACE
KARDINYA

G. CAHILL
2 CANARY PLACE
KARDINYA

G. & A. CAHILL
2 CANARY PLACE
KARDINYA

S. CAHILL
2 CANARY PLACE
KARDINYA

L. CAIN
5 STONE COURT
KARDINYA

F. & S. CALLUM
32 DAVIES CRESCENT
KARDINYA

I. CAMERON
102 LABOURCHERE ROAD
SOUTH PERTH

A. CARTER (Amanda)
5 MARITIME AVE
KARDINYA

A. CARTER (Andrew)
5 MARITIME AVE
KARDINYA

A.R. CARTER
5 MARITIME AVE
KARDINYA

T. CENIVIVA
71 MCBETH WAY
KARDINYA

G. CHESTER
84 WHEATLEY DRIVE
BULLCREEK

E. CHRISTENSEN

CITY OF COCKBURN
P.O. BOX 21
HAMILTON HILL

CITY OF MELVILLE
ALMONDBURY ROAD
ARDROSS

B. CLARKE
20 MCBETH WAY
KARDINYA

C. CLEARY

G. COATES
2 ATWELL COURT
KARDINYA

S. COLE
57 HALGONIA WAY
DUNCRAIG

E. COLLIERE
25 MARITIME AVE
KARDINYA

J. COLLIERE
25 MARITIME AVE
KARDINYA

J.P. COLLIERE
1e DESIGN STUDIO
371 ROKEBY ROAD
SUBIACO

A. & K. COLLINS
5 ALEPPO DRIVE
KARDINYA

CONSERVATION COUNCIL OF W.A.
794 HAY STREET
PERTH

F. COOMBS
14 RALSTON ROAD
KARDINYA

R. COOMBS
14 RALSTON ROAD
KARDINYA

A. CRAIG
5 BOSTOCK STREET
WHITE GUM VALLEY

H. CREAY

R. CUMMINGS
SCHOOL OF EDUCATION
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

J. CURRIE (Doctor)
5 CANARY PLACE
KARDINYA

J. CURRIE
5 CANARY PLACE
KARDINYA

M. DAVIS
6 TRALEE ROAD
FLOREAT PARK

S. DEAR
4/13 MYERS STREET
NEDLANDS

M. DEHAAN
3/103 MARY STREET
COMO

B. & W. De MEO
124 GILBERTSON ROAD
KARDINYA

C. & A. De MEO
UNIT 16/90 GILBERTSON ROAD,
KARDINYA

S. DEMEO
124 GILBERTSON ROAD
KARDINYA

M. DILWORTH
DEAN, SCHOOL OF ENVIRONMENTAL AND LIFE SCIENCES
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

R. DOCKER
28 HOPE ROAD
BIBRA LAKE

J. DUDLEY
91 BARKER DRIVE
DUNCRAIG

L. ELLARD
16 MARITIME AVE
KARDINYA

D. ELMS
110 GILBERTSON ROAD
KARDINYA

B. FARMER
15 MONTEREY COURT
KARDINYA

M. FARMER

N. FARMER
15 MONTEREY COURT
KARDINYA

P. FARMER
15 MONTEREY COURT
KARDINYA

R. FARRELL
PO BOX 641
FREMANTLE

C. FERRARA
KINGSWOOD COLLEGE
CRAWLEY

C. & F. FOXON
19 STONE COURT
KARDINYA

P. GABRIEL
49 SECOND AVE
ROSSMOYNE

A. GEORGE
7 ALEPPO DRIVE
KARDINAY

G. GEORGE
7 ALEPPO DRIVE
KARDINYA

T. GIBBONS
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

L. & D. GLASKIN
27 MONTEREY COURT
KARDINYA

A. GODFREY
213 LABOUCHERE ROAD
COMO

K. GODFREY
2 STONE COURT
KARDINYA

R. GODFREY
2 STONE COURT
KARDINYA

U. GRAHAM
HOLLINGWOOD PASTORAL CO.
RMB 230
WEST PINGELLY

S. GRAY
31 BOURNEMOUTH CRES
WEMBLEY DOWNS

P. & B. GREGORY

R. GRIFFITHS
24 YILGARN STREET
SHENTON PARK

GROUP OF ENVIRONMENTAL AND BIOLOGY STUDENTS
MURDOCH UNIVERSITY

S. GOWEGATIE
SCHOOL OF PSYCHOLOGY
MURDOCH UNIVERSITY

GUILD OF STUDENTS
MURDOCH UNIVERSITY
MURDOCH

P. & L. HAINES
10 MONTEREY COURT
KARDINYA

P. HALLEN
51 ST. LEONARDS AVE
LEEDERVILLE.

A. HANRAHAN
13 MONTEREY COURT
KARDINYA

M. HARCOURT
5 LEONARD PLACE
BULLCREEK

D. HARREY
15 BARCLAY ROAD
KARDINYA

M. HAYNES
21 MONTEREY COURT
KARDINYA

P. HAYES
21 MONTEREY COURT
KARDINYA

G. HEFTER
104 PETRA STREET
BICTON

J. HIRST
13 BARCLAY ROAD
KARDINYA

M. HOARE
60 TAIN STREET
ARDROSS

N.F. HODGKINSON
5 CAMERON WAY
KARDINYA

D. HOGG
11 STONE COURT
KARDINYA

R. HOLLIS
12 BURNEY COURT
KARDINYA

G.S. AND C.E. HUBBARD
12 STONE COURT
KARDINYA

B. HUNT

M. HYAMS
29 EDEN STREET
INNALOO

G. HYNDES
20/187 CANNING HIGHWAY
EAST FREMANTLE

INLAND AQUATIC RESEARCH GROUP
c/- 4 AILSA STREET
WEMBLEY DOWNS

G. JAMES
49 JOHN STREET
COTTESLOE

H. JENNINGS
14 STONE COURT
KARDINYA

P. JESSOP
10 BELLAIRS ROAD
KARDINYA

A. JOHNSON
41 WINDELYA ROAD
KARDINYA

B. JOHNSON
41 WINDELYA ROAD
KARDINYA

I. JOHNSON
1/9 ELEANOR STREET
COMO.

P. JOHNSON
25 MONTEREY COURT
KARDINYA

M. JONES
34 DAVIES CRESCENT
KARDINYA

K. KAPADIA
70 ATTFIELD ROAD
FREMANTLE

KARDINYA CONSERVATION GROUP
c/- 14 STONE COURT
KARDINYA

KARDINYA RESIDENTS ASSOCIATION
(5 submissions)
c/- PRESIDENT
15 MONTEREY COURT
KARDINYA

A. KEAN
24 MARITIME AVE
KARDINYA

R. KEAN
24 MARITIME AVE
KARDINYA

T. KEAN
24 MARITIME AVE
KARDINYA

KESHNA

V. KLEMM
43 JOINER STREET
MELVILLE

S. LANG

C. LAU
SCHOOL OF EDUCATION
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

N. LIVESEY
1 ARMSTRONG ROAD
ARMSTRONG

L. LONERAGAN
2209 ALBANY HIGHWAY
GOSNELLS

M. LONERAGAN
20 DORIC STREET,
SHELLEY

O. LONERAGAN
16 DEVERELL WAY
SOUTH BENTLEY

L. LUND
25 KYARRA STREET
INNALOO

J. MACHIN
HUMAN COMMUNICATIONS DEPT
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

G. MacPHAIL
7 COLIBRI COURT
WILLETTON

M. MacPHAIL
7 COLIBRI COURT
BURRENDAH

B. MAINSBRIDGE
DEAN
SCHOOL OF MATHEMATICAL AND PHYSICAL SCIENCES
MURDOCH UNVIERSITY
SOUTH STREET
MURDOCH

H. MARSHALL
12 HILDA STREET
SHENTON PARK

D.E. MARTIN
29 WINDELYA ROAD
KARDINYA

C. MASON
LOT 9 BUCHANAN ROAD
ROLEYSTONE

S. MASON
LOT 9 BUCHANAN ROAD
ROLEYSTONE

M. MAURITZ
86 REDFERN STREET
SUBIACO

V. MAY
11 WINDELYA ROAD
KARDINYA

L. McCALLUM
7 EGEUS WAY
COOLBELLUP

B. McCARTHY
22 MARITIME AVE
KARDINYA

J. & A. McCARTHY
22 MARITIME AVE
KARDINYA

M. McCLURE
43 DAVIES CRESCENT
KARDINYA

B. McGEORGE
8 ANNOIS ROAD
BIBRA LAKE

C. McKENZIE
11 BROOKMAN STREET
NORTH PERTH

K. McROBERTS
27 TULLAMORE AVE
THORNLIE

E. & M. MIGUEL
23 BARCLAY ROAD
KARDINYA

H. MILLWARD
24 BEASLEY ROAD
LEEMING

F. & E. MORESCHINI
11 MONTEREY COURT
KARDINYA

M. MOREY
17 MARITIME AVE
KARDINYA

R. MORGAN
58A JENKIN STREET
SOUTH FREMANTLE

R. MOSS
317 HIGH STREET
FREMANTLE

D. MUIR
52 ROME ROAD
MELVILLE

MURDOCH ASTRONOMICAL SOCIETY
PRESIDENT
c/- SCHOOL OF MATHEMATICAL AND PHYSICAL SCIENCES
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

MURDOCH UNIVERSITY STAFF
SCHOOL OF EDUCATION
MURDOCH UNIVERSITY
MURDOCH

W. & L. MURPHY
7 WINDELYA ROAD
KARDINYA

M. E. NAIRN
DEPUTY VICE-CHANCELLOR
MURDOCH UNIVERSITY
MURDOCH

V. NYLANDER
18 DIXON PLACE
KARDINYA

M. O'DONNELL
9 CAPPER PLACE
KARDINYA

W. O'HALLORAN
9 SEXTON COURT
KARDINYA

V. OLIVER
8 MALVOLIO ROAD
COOLBELLUP

K. ORR
5 KATRINE STREET
FLOREAT

O. VAN KEULEN
31 STRODE AVE
HAMILTON HILL

M. PACKER
21 STOKES STREET
WHITE GUM VALLEY

M. PARKER
19 MONTEREY COURT
KARDINYA

K. PATTERSON

A. PAYNE
54 BLENCOWE STREET
LEEDERVILLE

G. PENNY

PERSON LIVING AT
3 STONE COURT
KARDINYA

PERSON LIVING AT
24 MARITIME AVE
KARDINYA

PERSON LIVING AT
MURDOCH UNIVERSITY
MURDOCH

PERSON LIVING AT
28 MARITIME AVE
KARDINYA

S. PHILLIPS

T. PICKETT
4 ALEPPO DRIVE
KARDINYA

D. PICKNOLL
6 HOPE STREET
WATERMAN

PILSWORTH FAMILY
24 ALEPPO DRIVE
KARDINYA

C. POOLE
77 PURLEY CRESCENT
LYNWOOD

P. PORTER
18 ANGWIN STREET
EAST FREMANTLE

J. PRATT
14 ALEPPO DRIVE
KARDINYA

K. PRATT
14 ALEPPO DRIVE
KARDINYA

K. & Y. PRATT
14 ALEPPO DRIVE
KARDINYA

M. PRATT
14 ALEPPO DRIVE
KARDINYA

A. PRITCHARD
12 MIRANDA CRES
COOLBELLUP

S. PRITCHARD
7 EGEUS WAY
COOLBELLUP

Y. PRITCHARD
7 EGEUS WAY
COOLBELLUP

F.M. PRYCE
7 LATHAM STREET
ALFRED COVE

C. RADECKI
47 THE BOULEVARDE
MT. HAWTHORN

J. RANKINE-WILSON
9 EDWARDS STREET
NEDLANDS

R. & A. RASPA
40 GLADSTONE ROAD
RIVERVALE

S. O. & F. RAUS
27 MARITIME AVE
KARDINYA

A. REA

J.A. REA
4 MARITIME AVE
KARDINYA

P. REA
4 MARITIME AVE
KARDINYA

S. REALL
c/- KINGSWOOD COLLEGE
HAMPDEN ROAD
CRAWLEY

G. REINHARDT
20 WYNNE STREET
HAZELMERE

J.W. ROBINSON
92 SOLOMON STREET
PALMYRA

J. RODDA
79 ALEXANDRA ROAD
EAST FREMANTLE

S. RUANE
52 WOOD STREET
WHITE GUM VALLEY

K. RUSSELL
SCHOOL OF EDUCATION
MURDOCH UNIVERSITY
SOUTH STREET
MURDOCH

J. SANCHEZ-FLORES
23 DAVIES CRES
KARDINYA

A. & D. SANDERSON
48 MARCHANT ROAD
SAMSON

S. SCHREUDER
65/150 MILL POINT ROAD
SOUTH PERTH

J. SEARLE
16 ARNOLD CRESCENT
NORTH LAKE

J. SHARP
62 BRISTOL AVE
BICTON

B. SHAW
100 GILBERTSON ROAD
KARDINYA

R.L. SHUFORD
61/42 WATERLOO CRESCENT
EAST PERTH

B. SHULTZ
91 WEBSTER STREET
NEDLANDS

D. SMART
64 STANLEY STREET
NEDLANDS

T. SMITH
3 DUGGAN COURT
KARDINYA

G. SOUTAR
14 BARCLAY ROAD
KARDINYA

D. STANTON
33 WINDLEYA ROAD
KARDINYA

B. STEELE
23 MONTEREY COURT
KARDINYA

L. STEELE
23 MONTEREY COURT
KARDINYA

R.D. STEELE
23 MONTEREY COURT
KARDINYA

R.G. & T. STOBBS
15 WINDELYA ROAD
KARDINYA

L. STOFFELS
33 NANNATEE WAY
WANNEROO

M.J. STOKES
5 PALM PLACE
WILSON

Z. SUMICH
37 WINDELYA ROAD
KARDINYA

P. SUMMERS
51 ST. LEONARDS AVE
LEEDERVILLE

L. TANDY
21 PIER STREET
EAST FREMANTLE

E. THORNER
13 ALEPPO DRIVE
KARDINYA

F. THORNER
13 ALEPPO DRIVE
KARDINYA

S. AND V. THURGATE
19 MARITIME AVE
KARDINYA

I. TOMICH
87 STEVENS STREET
WHITE GUM VALLEY
FREMANTLE

UNITED BIRD SOCIETIES OF W.A.
SECRETARY
138 QUEENS ROAD
SOUTH GUILDFORD

A. VAN BLOMMESTEIN

K. WAINWRIGHT
22 MARITIME AVE
KARDINYA

S. WAINWRIGHT
22 MARITIME AVE
KARDINYA

V. WALSH
13/142 WATKINS STREET
HILTON

R. WARDEN
86 RISELEY STREET
ARDROSS

R.A. WARREN
7 DORWARD COURT
KARDINYA

WATERBIRD CONSERVATION VOLUNTEER GROUP
SECRETARY
6 ILFORD PLACE
THORNLIE

J. WATT
97 NORTH STREET
BASSENDEAN

H. WATTS
5 DUNFORD STREET
WILLAGEE

J. WATTS
2 MARITIME AVENUE
KARDINYA

L. WATTS
5 DUNFORD STREET
WILLAGEE

K. WEATHERALL

H. WEDD
32 DARCH STREET
YOKINE

J. WELLS
37 BURSARIA CRESCENT
FERNDALE

J. WERNER
14 KENMARE AVE
THORNIE

T. WERNER
14 KENMARE AVE
THORNIE

A. WESTHOFF
6/60 GWENYFRED ROAD
KENSINGTON

K.A. WHITTON
12/11 OUTRAM STREET
WEST PERTH

F. WILLIAMS
11 BROOKMAN STREET
NORTH LAKE

M. WILSON
7 LONGFELLOW ROAD
GOOSEBERRY HILL

P. WILSON
7 LONGFELLOW ROAD
GOOSEBERRY HILL

R. WILTSHIRE
2/30 WELLINGTON STREET
MOSMAN PARK

M. & J. WOOD
27 BARCLAY ROAD
KARDINYA

A. WOODCOCK
UNIT 8/12 WATLING AVE
LYNWOOD

L. WOODCOCK
UNIT 8,
12 WATLING AVE
LYNWOOD

W. WORTH
1/120 GILBERTSON ROAD
KARDINYA

LIST OF ATTACHMENTS IN APPENDIX

1. COCKBURN WETLANDS STUDY MARCH '76
2. SYSTEM 6 GREENBOOK ENDORSES APR '81
3. MELVILLE SUBMISSION ON GREENBOOK 11 SEPT '81
4. MRD OBJECTS TO GREENBOOK REC. 11 NOV '81
5. COCKBURN OBJECTS TO GREENBOOK REC. 17 NOV '81
6. MURDOCH CEDES LAND 23 JUNE '83.
7. MRD ADVISES MINISTER ON FARRINGTON ROAD
(NO ATTACHMENT) . 22 JULY '83
8. MINISTER FOR TRANSPORT ADVISES
COMMONWEALTH 26 JULY '83
9. EPA ENDORSES GREENBOOK IN REDBOOK OCT '83
- 10/ CABINET ACCEPTS REDBOOK MARCH '84
11. CABINET RELEASES REDBOOK MAY '84
12. MRD CONTACTS DCE, DCE WRITES TO MRD 25 MAY '84
13. MRD ADVISES EPA via NOI
(INCLUDES LETTER FROM COCKBURN
14/2/83) + MELVILLE (23/2/83)
(14 + 15) 19 JUNE '84
16. EPA NO. 324 EXAMINES NOI 28 JUNE '84
17. COCKBURN SENDS STRONG LETTER TO MRD 13 JULY '84
18. MELVILLE SENDS STRONG LETTER TO MRD 19 JULY '84
19. MRD ADVISES EPA THAT LOCAL AUTHORITY
IS THE CONSTRUCTING AGENCY WITH THE
RESPONSIBILITIES 31 JULY '84
20. EPA NO. 327 HELD INCLUDING LOCAL
AUTHORITY REPRESENTATIVES AND MRD 9 AUG '84
21. COCKBURN WRITES TO EPA GIVING NECESSARY
ASSURANCES 16 AUG '84
- CHAIRMAN EPA MAKES EXECUTIVE DECISION 23 AUG '84

22/23.	DCE ADVISES COCKBURN FOR EPA COCKBURN LETTER COPIED TO MELVILLE	27 AUG '84 4 SEPT '84
24.	CHAIRMAN ADVISES MINISTER	10 SEPT '84
25.	MINISTER ASKS EPA TO REVIEW ANY ADDITIONAL INFORMATION FROM PUBLIC REVIEW.	13 SEPT '84
26.	EPA NO. 330 CONSIDERS MINISTER'S LETTER	20 SEPT '84
	SUBMISSION PERIOD ENDS	26 SEPT '84
	EPA MEETS	2 OCT '84
	EPA REPORTS TO CABINET	