



2nd October 2009

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Jandakot Airport Holdings
16 Eagle Drive
Jandakot WA 6164

Dear Sir

2009/4796 JANDAKOT AIRPORT HOLDINGS: TRANSPORT - AIR AND SPACE 16 KM SOUTH OF PERTH WA. JANDAKOT AIRPORT EXPANSION, COMMERCIAL DEVELOPMENT AND CLEARING OF VEGETATION ADDITIONAL INFORMATION

The Urban Bushland Council WA makes the following submission. Please note that we endorse and commend to you the detailed submission by the Friends of Ken Hurst Park and the WA Native Study and Conservation Group. Both groups have members with considerable local knowledge and professional expertise.

In summary, the Urban Bushland Council (UBC) is strongly opposed to the clearing of the 167ha of excellent quality bushland comprising Banksia Woodland and recommends that the clearing not be approved. Further we recommend that this area and all the remaining bushland at Jandakot be secured and managed as a *national conservation reserve* in perpetuity. The bushland provides a buffer zone to aviation activities and is on the Jandakot Water Mound and should not be further disturbed by clearing for roads and commercial or other developments.

Context of the proposed clearing

The vegetation complex is Bassendean Complex - Central and South on the Bassendean landform and is both regionally and nationally significant bushland recognised by the State Government as Bush Forever site no 388. Importantly this vegetation complex is under-represented in Bush Forever which aims to protect at least 10% of each complex according to the National Objectives and Targets for Biodiversity Conservation (Commonwealth of Australia 2001). . This is largely because so much Bassendean Central and South has been cleared on Jandakot Airport and on Perth Airport where the best representations of this complex are (and were) located.

The Commonwealth to date has failed to ensure the protection and conservation of two of the three best habitats (both airports) in the Perth region in terms of species richness and variety and connectivity of so many ecological communities, many of which are rich vegetated wetlands. This type of species rich vegetation and its diverse fauna exists nowhere else in Australia except on the Swan Coastal Plain. We emphasize that Jandakot Airport, Perth Airport and Whiteman Park are the top three sites for fauna diversity in the Perth region (Bush Forever, Government of Western Australia December 2000). These Commonwealth lands deserve national protection but Commonwealth laws have failed to achieve this and this is in an internationally recognised hotspot of biodiversity for conservation priority (Myers et al).

Additional information

The additional information given by JAH to justify clearing is deficient, giving an understated statement of values to the point of being misleading. We refer you to the details of these deficiencies stated in the submission by the Friends of Ken Hurst Park.

Native orchids

It is unacceptable for JAH to have failed to conduct proper rigorous surveys of orchid populations on this site and on the whole Airport as a context. Thorough surveys repeated over a number of years we believe is likely to reveal even more species of orchids at the Airport and in the 167 ha site proposed for clearing. We draw to your attention the list of another 21 species of orchids below compiled by the Friends of Ken Hurst Park and the Orchid Study Group and the presence of significant species which require further survey and assessment.

- *Caladenia arenicola*
- *Caladenia falcata*
- *Caladenia flava*
- *Caladenia longicauda subsp calcigena*
- *Cyanicula gemmata*
- *Cyanicula sericea*
- *Diuris corymbosa*
- *Diuris magnifica*
- *Diuris sp Sandplain*
- *Elythranthera brunonis*
- *Eriochilus multiflorus*
- *Leporella fimbriata*
- *Prasophyllum hians*
- *Prasophyllum ovale*
- *Prasophyllum parvifolium*
- *Pterostylis sp slender*
- *Pterostylis recurva*
- *Pterostylis sanguinea*
- *Pyrorchis nigricans*
- *Thelymitra benthamiana*
- *Thelymitra campanulata*

Listed endangered species

We believe this is the most important site for the listed endangered orchid *Caladenia huegelii* and failure to present comprehensive population and location data is unacceptable. Clearing of any of this population is unacceptable as '**biodiversity is best conserved in situ**' (principle no1 of the *National Strategy for the Conservation of Australia's Biological Diversity* (Commonwealth of Australia 1996). There is no adequate data to suggest that translocation of orchids is viable over the long term and it is important that sites such as this 167ha are conserved. Commercial developments can take place on other lands, this development proposal is not part of aviation infrastructure.

Carnaby Cockatoo habitat

The listed endangered species Carnaby's Cockatoo is already in decline in part because of loss of nesting habitat but also significantly because of loss of feeding habitat due to clearing. Banksia Woodland is very important feeding habitat for Carnaby's and far too much is being cleared.

We note that the State lists Carnaby's at a higher level of threat than the Commonwealth and we recommend that the listing by both the State and Commonwealth should be reviewed with a view to elevating the level of threat and making both lists comparable.

Our observations are that Carnaby's is seeking new feeding habitat as it has lost so much from clearing. Clearing of 167 ha Banksia Woodland at Jandakot will be a very significant loss of feeding habitat and thus clearing should not be permitted as it will be an unacceptable impact on the species.

Jandakot Water Mound

The area proposed for clearing is on the Jandakot Mound and for this reason alone should not be permitted. The UBC strongly objects to any further clearing on the Jandakot Mound as this is a groundwater water supply catchment area. Such a proposal would never be accepted on a surface water supply catchment.

As we have stated in earlier submissions on other JAH proposals and for the Master Plan, we are appalled that clearing for non-aviation purposes can occur on the Mound and further that the existing building infrastructure at the Airport was and as far as we know is still unsewered, providing an obvious avenue for groundwater contamination by wastewater and aviation fuels and chemicals.

Conclusion

- the proposal would result in clearing 167 ha of irreplaceable biodiversity
- the remnant vegetation to be cleared is recognised as regionally and nationally significant through its listing as a Bush Forever site and interim listing on the Commonwealth's Register of the National Estate.
- the amount of vegetation cleared is a significant proportion of the remaining habitat for Carnaby's Cockatoo, the Grand Spider Orchid and the Glossy-leaved Hammer Orchid
- the loss of 167 ha of habitat would significantly impact on Carnaby's Cockatoo, the Grand Spider Orchid and the Glossy-leaved Hammer Orchid
- the remnant vegetation to be cleared is in very good to excellent condition and is under-represented in the conservation estate
- the clearing of 167 ha of remnant vegetation is for commercial gain and is not in the public interest or for the common good
- there are more Grand Spider Orchids in the areas to be cleared than currently recognised, acknowledged or documented
- the number of Grand Spider Orchids and the Glossy-leaved Hammer Orchids present on the site and that would be removed is still not known with a sufficient amount of certainty to allow the impact to be assessed adequately
- the proposal for translocating orchids is unacceptable and is not necessary since the orchids can be conserved in-situ
- management of Jandakot Airport bushland and Ken Hurst Park by Jandakot Airport Holdings is not supported by other stakeholders
- the level and sincerity of public consultation is inadequate
- the offsets proposed if clearing were approved are completely inadequate and we do not support the concept of offsets for high quality bushland which cannot be replaced
- there are other feasible and much more environmentally appropriate alternatives where commercial developments can take place on cleared land.

Yours sincerely

C Mary Gray
President

Copy to
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