



20 November 2008

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The Managing Director
Jandakot Airport Holdings Pty Ltd
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Dear Sir

JANDAKOT AIRPORT MASTER PLAN 2005: MINOR VARIATION NO. 2

The Urban Bushland Council WA (UBC) makes the following comments on the proposal to clear 3.29 ha of Banksia woodland for the Southern Link Road in the Jandakot Airport Precinct.

- The development of a road as proposed along Lancaster Road is incompatible with the designation of the area in the Master Plan as a Conservation Precinct, and is therefore at variance with the Master Plan and should not proceed.
- Because of the outstanding conservation values of the Airport, we do not believe that this proposal should be classed separately as a 'minor variation' especially when the advice given by DEC, the Friends of Ken Hurst Park and the UBC in submissions to the earlier proposals objected to this road proposal and indeed the Federal Minister for the Environment did not support the proposals. Breaking the proposals down into 'minor variations' does not render them acceptable.
- **Bush Forever:** The land proposed to be cleared is part of Bush Forever Site No. 388 and is thus regionally and nationally significant. Indeed Jandakot Airport is one of the three most important sites for fauna habitat and diversity of species in the Perth region, the latter a biodiversity hotspot in its own right. Jandakot Airport is also listed on the Register of the National Estate. As stated in our earlier submissions on the Master Plan, the Urban Bushland Council does not support any further clearing or fragmentation of this very important conservation area.
- **Carnaby's Cockatoo:** The proposed area to be cleared is Banksia woodland which is heavily used by the Carnaby's Black Cockatoo. While this is acknowledged in the Public Document, there is very little discussion of the fact that this species is threatened and protected under both State and Commonwealth legislation, and no discussion regarding the detrimental impact this clearing will have on the long-term survival of the species, particularly in view of the incremental clearing of Banksia woodland in the Perth metropolitan region. The clearing proposed is a threatening process to a matter of National Environmental Significance, and should not be approved. In any event, this proposal must be referred to the Commonwealth DEWHA, which has apparently not been done.
- **Caladenia huegelii:** The proposed area to be cleared is Banksia woodland which is habitat for the biggest and most significant population of *Caladenia huegelii*. There is very little discussion of the fact that this species is threatened and protected under both State and Commonwealth legislation. The clearing proposed is a threatening process to a matter of National Environmental Significance, and

should not be approved. In any event, this proposal must be referred to the Commonwealth DEWHA by the proponent.

- **Road safety argument:** The argument that this road provides a second access/egress road to Jandakot Airport and is therefore essential for safety reasons is spurious and incorrect. There is already a second access/egress road to Jandakot Airport, being Berrigan Drive. This proposal simply replaces that road with another as it is proposed to discourage use of Berrigan Drive. The replacement road is actually very close to the road that it is intended to replace and actually connects with the same intersection so that it does not offer any advantages or benefit and makes little difference in terms of safety.
- **Road capacity:** The existing access road, Berrigan Drive, has adequate capacity to handle all the traffic that is likely to need to use the road, with or without the commercial development. The road planning undertaken by the traffic planner reported on p64 of the Public Comment document indicates that in 2016 the V/C of Berrigan Drive north (ie between Hope Road and Jandakot Road) without development would be 0.36 – 0.47 if no new road was built, and this would increase to 0.45 – 0.8 with the commercial development, but that this is well within the capacity of the existing road (p67). By 2031, the V/C of Berrigan Drive north without development would be 0.43 – 0.58 if no new road was built (p70), and this would increase to 0.48 – 1.03 with the commercial development. This is at worst marginally over the capacity of the existing road at certain times and in certain directions, but certainly not a compelling argument for a new road. The new road is therefore not necessary and should not be built. Only Berrigan Drive south of Jandakot Road needs to be upgraded, and this can occur without a new road being constructed.
- **Maps, drawings:** Some of the maps and drawings in the Public Document are wrong or inconsistent with the original Masterplan. For example, Figure 1, which is purportedly from the original Master Plan dated 29 November 2004, is actually dated 22 April 2008. What has been changed in the new map that may make it different to, but appear the same as, the original map. Further, the drawing on p147 dated 6 March 2008 still shows the entire area where *Caladenia huegelii* exists proposed to be cleared and developed when that has been rejected. The wetland map (Figure 8) appears to be incorrect as the Vegetation Community K1 (Open forest of *Eucalyptus rudis* and *Melaleuca preissiana*) (see Figure 6) is also a dampland community but is not shown as such.
- **Caladenia huegelii nos:** The Public Document does not discuss how many *Caladenia huegelii* plants are within a few metres of the 50 m buffer adjacent to the road, and therefore how many plants are at risk. This is essential information to enable a risk assessment to be undertaken regarding the acceptability of the road. The document does not indicate whether a survey for *Caladenia huegelii* was undertaken in 2007 or 2008, but implies that there was not as the vegetation maps are dated September 2006. This is not acceptable as orchids germinate irregularly and unpredictably from their underground tubers. Not to do a survey just prior to seeking approval, when the matter is of National Environmental Significance, is very poor environmental management and is not acceptable.
- **Significant fauna:** The general bushland in the area to be cleared has high biodiversity with large numbers of bird species, and populations of Priority fauna such as Black-striped Snake (Priority 3), Perth Lined Lerista (Priority 3), western brush wallaby (Priority 4), quenda (Priority 5) and honey possum. This is not acknowledged or discussed in the Public Document.
- **Road edges:** There is no discussion on how wide the clearing for the road will be and what measures have been or could be employed to reduce the footprint, such as the width of the recovery zone, the use of wire rope safety barriers, the slope of the cut and fill embankments. Thus, the environmental considerations and management measures for the major environmental issues for this proposal are virtually non-existent.

- **Rehabilitation of disturbance:** There is little or no discussion regarding how the disturbed area from construction of the road would be rehabilitated. There is no discussion of the collection and use of topsoil, the most important resource from clearing, and very little discussion of how the verge would be revegetated whether via tubestock or broadcast seed. This indicates this issue has not been considered adequately, which is not acceptable given the significance of the vegetation to be cleared.
- **Strategen report:** The Environmental Aspects report prepared by Strategen is qualified by the comment "...it should be noted that this report is a qualitative assessment only... ". Further, "Strategen has not attempted to verify the accuracy or completeness of the information supplied by the client." This suggests the report is not reliable and in fact is inadequate for the purposes of assessing the proposal.

Conclusion

The entire proposal as described in the Public Document is unacceptable and the information presented is woefully inadequate in order to properly assess the need for the proposal and the environmental impacts of what is proposed.

We believe the proposal is totally unacceptable and should not proceed in its current form and further cannot be made acceptable.

Yours sincerely

C Mary Gray
President

cc DEWHA
DEC
Bush Forever Office DPI