



20 September 2015

Perth Airport
Integrated Planning
PO Box 6
CLOVERDALE WA 6985
Email: MDP@perthairport.com.au

Dear Sir/Madam,

Submission – Preliminary Draft Major Development Plan Forrestfield-Airport Link (within the Perth Airport Estate)

The Urban Bushland Council presents the following submission in regard to the *Forrestfield-Airport Link (within the Perth Airport Estate) Preliminary Draft Major Development Plan (August 2015)*

The Urban Bushland Council (UBC) is a peak community conservation body with over 70 member groups. The UBC lobbies for the conservation and appropriate environmental management of bushland remnants in urban areas in Western Australia – particularly those located in and around Perth. The Perth area is located within a biogeographic region (the south west of Western Australia) that is internationally recognised for its biodiversity. Within that context the Swan Coastal Plain is noted for its biodiversity in itself and within that context the Perth region is of special environmental significance also. The eastern side of the Swan Coastal Plain has been very heavily cleared south of the Swan River and Perth Airport lies in this landscape.

The Urban Bushland Council has been pressing for the protection and appropriate environmental management of Perth Airport's natural areas since the days when it was run by the Federal Airports Corporation and had not yet been privatised.

Historical Recognition of Perth Airport's Environmental Values

The conservation values of Perth Airport's natural areas were recognised at the State level as far back as the release of the *System 6 Report* in the early 1980's. This Report made Recommendations for nature reserves in the Darling system which took in Perth Airport. The Report recommended that as much of the remnant vegetation and habitat as possible at Perth Airport (classified as Site M53 in that Report) should be reserved. The WA State Government's Bush Forever (2000) also recognised the strong conservation values of Perth Airport and made similar recommendations – subject to Master Plan processes.

Removal of Conservation Precincts

In all the *Perth Airport Master Plan* documents released and approved since the Airport was privatised in 1997 up until last year, two Conservation Precincts totalling about 310 hectares were

identified for protection and appropriate environmental management. The Airport leaseholder argued strongly that this meant they were meeting their environmental obligations under the Airports Act and to the community generally. But owing to the erosion of environmental standards that has occurred at the Commonwealth level over last couple of decades, the leaseholder feels no such obligations under the present legislative, regulatory, and administrative regime and the Perth Airport's natural areas are now all under threat of eventual destruction. This is nothing to do with progress in any worthwhile sense of the term.

The Urban Bushland Council considers it an outrage that Perth Airport Pty Ltd was given permission to remove these two Conservation Precincts from the *2014 Perth Airport Master Plan* by the Commonwealth Government. There is no valid reason why the community is not entitled to see large representative parcels of irreplaceable natural heritage on such a large estate protected in perpetuity. Destroying unique and irreplaceable native vegetation and habitat in a vegetated wetland ecosystem is totally unacceptable to the community. An un-enlightened and destructive approach to the environment is not suited to either politics or business in either contemporary Australia or the modern world.

Munday Swamp and Environs under Threat from Spoil Dumping

Munday Swamp and its environs were formerly included in Conservation Precinct 7, which took in much of the natural bushland in the northern part of the airport and some buffer areas as well. Now it is proposed that spoil from tunnelling and excavations for the proposed Forrestfield-Airport Link rail project might be dumped in the immediate vicinity of this outstanding and unique wetland (Stockpile Location 1 and 2 Figure 4.12 p.30). This is not only entirely objectionable from an environmental perspective but it would also potentially involve dumping spoil on top of, or very adjacent to, Registered Aboriginal sites near Munday Swamp. Conservation Precinct 7 should not have been removed in the 2014 Perth Airport Master Plan and it has taken no time for outrageously inappropriate land uses – such as dumping tunnelling spoil – to be proposed for land formerly within its boundaries. The land to the east of Munday Swamp was intended to be an environmental buffer and there was some suggestion years ago from the staff at Perth Airport that this land could be rehabilitated with top soil taken from bushland areas that would be cleared for the new parallel runway.

The UBC's representatives have been familiar with Munday Swamp and its surroundings for decades. We are fully aware that there are quite rich artefact scatters in the sandy blowouts to the immediate east of Munday Swamp. We are also aware that Munday Swamp has contemporary cultural significance for Aboriginal people and it is our very strong view that dumping spoil so close to this magnificent wetland and cultural site would be akin to vandalism.

Perth Airport is relatively flat and low-lying and is largely classed as being palusplain wetland in WA Water Authority mapping. Notably most was registered on the Commonwealth Government's *Register of the National Estate* as nationally significant natural and cultural heritage. Significant quantities of water pass through the site and are held therein in swamps and in shallow groundwater. It is exceedingly important that water passing through the site or held within the site is not contaminated with chemicals or loaded with sediment emanating from within Perth Airport. Placing spoil dumps in the vicinity of large drainage systems such as those associated with Poison Gully Creek and Munday Swamp puts these systems – which both drain to the Swan River only a few kilometres away – at risk of picking up contaminants and sediment that can only cause problems for water quality and associated ecosystems. There may also be irreversible contamination problems associated with acid sulphate soils.

It is our very strong view that spoil from the tunnelling and excavation processes associated with the Forrestfield-Airport Link must not be either processed (for acid sulphate conditions) or stored at Perth Airport. The site is too environmentally sensitive – it has large natural areas with high conservation values – and it is part of important drainage systems which must not be contaminated with either sediments or chemical contaminants that could escape from treatment plants or stockpiles.

General Comments regarding Perth Airport Rail Link

This Major Development Plan purportedly only deals with that portion of the Perth Airport Rail Link which passes through Perth Airport. It is our understanding that Perth Airport is not the proponent and that it is a WA State Government initiative funded by the same. Perth Airport may be a major beneficiary – as in the case of the Gateway project – but it is being generously funded by taxpayers. Nevertheless, the UBC has some views regarding the overall project which should not be out of place in planning documents. In fact, one of the problems with this whole project is that it is hard to see why it is being undertaken.

Extraordinary amounts of government money have just been spent to build giant roads into Perth Airport – presumably indicating the Commonwealth and State government believe private vehicles will be an exceedingly important means of accessing the airport into the distant future. Now the State Government wants to spend vast amounts of money on the assumption that people will want to use public transport for the same purpose. But where is the evidence? There have been public buses travelling to Perth Airport for decades. But patronage for airport purposes is negligible. For such a remarkable outlay of funds, it is reasonable to question why there are no major studies into projected usage and passenger numbers underpinning the project. Even for non-airport usage, the assumptions regarding patronage do not seem to have any substantial basis. Where is the economic modelling and case to justify this expenditure?

Proposed residential developments in Forrestfield, in the vicinity of the proposed new station, seem to be based on the long-standing view of the WA State Government and the WA Planning Commission that residential development in highly aircraft-noise-exposed areas is a good idea. It is not a good idea; it never was a good idea; and it never will be a good idea. People are entitled to live in liveable environments and if the WA Government wants to consolidate the pre-conditions for the introduction of airport curfews they are going the right way about it.

Belmont residents are supposed to be beneficiaries of the Rail Link but their proposed station is at the extreme east of the district and it is isolated by Tonkin Highway. They would have to travel east – presumably along one road (Stanton Road) - to catch a train to travel west to the city. Alternatively, they could drive the short distance into the city: or they could just catch a bus travelling west as they do now; or they could just ride a bicycle on the excellent cycle ways.

Growth in aircraft passenger numbers is tied to the economy and the economy is coming off a prolonged boom. The international economy is fragile at best and there is no reliable means of telling what it will be like in five years time frame let alone any further out into the future. But this uncertain outlook is not reflected in the willingness of governments, who already have serious debt problems, to risk creating infrastructure white elephants at enormous cost to the community. This project should have had a great deal more analysis to prove it was justified. Throwing out ill-considered promises during election campaigns is no way to plan and implement properly staged infrastructure development for the Perth.

Stockpiles, dewatering and Acid Sulphate soils

Stockpiles

The Urban Bushland Council vehemently objects to the stockpiling of tunnel spoil anywhere near Munday Swamp or any at any other location on Perth Airport land that is near drainage systems, wetlands, or native vegetation. This spoil is not going to be the equivalent of naturally occurring surface soil. It will be drawn from deep underground and will probably have been treated with lime (calcium carbonate). Lime reacting with the acid (sulphuric) will produce gypsum (calcium sulphate) and this is not a naturally occurring material on the site. This is the equivalent of a mullock heap and it could not be used to recreate naturally occurring habitat. Our advice is that the material would probably not be suitable for building purposes as gypsum and clay mixes are prone to expansion. So this stockpiling proposal is really a dumping proposal introducing a vast amount of essentially foreign material to an environmentally sensitive area and next to Munday Swamp in particular. This is totally unacceptable.

Virtually the whole estate is prone to some degree of flooding in very wet years and it is therefore not a suitable location for treatment works or the stockpiling of tunnel spoil. Flooding and erosion and leakage could lead to the sediment being carried into high conservation value wetlands and into drainage channels leading to the Swan River. Any contaminants in the spoil – and acid sulphate conditions can release naturally occurring metals which will contaminate groundwater, wetlands, and drainage channels leading to the Swan River.

The MDP refers to 300,000 cubic metres of soil being displaced by tunnelling works for the 3.8 kilometre section of the proposed tunnels lying within the boundary of the airport estate (p.21). There is no reference to spoil from tunnelling outside the estate so we would have to assume the MDP does not cover the stockpiling of material extracted from outside of airport estate. 300,000 cubic metres is a very large amount of soil and it should not be dumped on the airport estate. Neither should the spoil extracted for the construction of the Airport Central Station. The Airport Central station is expected to result in the extraction of a further 80,000 cubic metres of spoil (p.26) so the total volume of material is extremely large.

Acid Sulphate Soils and Dewatering

The MDP states that *“the majority of the material excavated to construct the underground structures is likely to be acid sulphate soils”* (p.39). This means treatment of the material will be a major undertaking and that it will require considerable planning. Again it is the UBC’s strong view that the airport estate – particularly in the vicinity of environmentally sensitive areas or drainage systems – is not an appropriate site for treatment works. We are aware of the conventional methods of treating acid sulphate soils. Given the scale of soil extraction anticipated for tunnelling and other construction treatment, it will involve very large amounts of material and significant operations involving plant and equipment.

While methods of recharge of groundwater extracted for construction purposes are reasonably well-established, it is very important that proper monitoring and treatment of water affected by acid sulphate soil issues is undertaken. It is concerning to see references to *“surplus groundwater”* potentially being *“discharged into appropriate nearby water courses”* (p.52). This water would have to be very carefully monitored for quality as it would be exceedingly inappropriate to be sending acidic or heavy metal contaminated or highly sediment-charged water into the airport’s drainage system. It would appear to us the aquifer recharge of abstracted water that has been carefully

monitored for quality - and treated if necessary – is a better option, but wet construction techniques would be much better (where there is no dewatering).

Aboriginal Heritage

The Urban Bushland Council is committed to the protection of Aboriginal heritage sites and sees the conservation of bushland areas around Perth as contributing to the respect that European and other more recently established cultures should be demonstrating with regard to the traditional Aboriginal culture of the region. It is our understanding that Munday Swamp is of contemporary cultural significance to Aboriginal people and it certainly would have part of a major hunting ground for Aboriginal people seeking waterbirds and tortoises that existed on the land that is now occupied by Perth Airport. There were enormous vegetated wetland areas on Perth Airport before major drains were established and the number of artefact scatters on the site clearly indicates it was a site of traditional occupation for Aboriginal people for many thousands of years.

The MDP devotes very little attention to the matter of the impact on Aboriginal sites of proposed stockpiles whereas the UBC regards this as a particularly significant issue. The MDP states that “*six Aboriginal sites defined under the AHA are present within the stockpile area*” (p.51). Perth Airport may claim that it ‘*recognises Aboriginal people have a special association with the land*’ (p.51), but it hardly demonstrates this recognition by proposing to dump very large quantities of spoil on or near their heritage sites. It is our every strong view that establishing stockpiles in this area is totally unacceptable from the perspective of Aboriginal heritage lone – let alone our environmental objections.

We would like to point out that Aboriginal heritage is not exclusively the interest of the WA Department of Aboriginal Affairs or of contemporary Aboriginal stakeholders that have been identified by Perth Airport. The protection of Aboriginal heritage is the responsibility of the whole community and bureaucratisation of Aboriginal site destruction does not make it acceptable. The MDP states that:

Perth Airport will undertake all relevant applications under Section 18 of the AHA prior to undertaking any works that have the potential to impact registered Aboriginal Heritage sites. In addition, Perth Airport will continue to liaise with key Aboriginal stakeholders prior and during works (p.51).

The crude presumption inherent in these words is exceedingly distasteful. It may indeed be possible to obtain permission to destroy or disturb Aboriginal heritage sites by filling out a few forms and submitting them to the WA Department of Aboriginal Affairs but the heritage significance of the Munday Swamp area as a whole should be appreciated sufficiently to deter any party from proposing to dump huge quantities of waste materials in such a location. Once again, the Urban Bushland Council vehemently objects to these heritage sites being impacted by spoil dumping - either on them or near them. Conservation Precinct 7 should never have been removed from the Perth Airport Master Plan and this appalling proposal demonstrates why the Commonwealth should act in the interests of the community and simply ban the development or destruction of the remaining natural areas and Aboriginal sites at the airport unless it can be proven the underlying land is essential for aviation purposes.

Conclusion

The Urban Bushland Council has put its views regarding this Preliminary Draft Major Development Plan for the Forrestfield-Airport Link. The Council believes the proposed siting of spoil dumps (called stockpiles in the document) near Munday Swamp is environmentally unacceptable and it is also unacceptable from the perspective of protecting the nation's Aboriginal heritage – for all Australians. Perth Airport is low-lying, it is mostly a wetland landscape, and it has many drainage systems that flow towards the Swan River. Sediment and contaminants from spoil dumps must not be allowed to enter groundwater, or drainage systems, or wetlands at Perth Airport. Such unforeseen events as floods can mobilise excavated soil which can in turn lead to ecosystems being affected by foreign soil and contaminants.

Yours faithfully

Vice President
Urban Bushland Council WA Inc.

cc Chairman EPA, and OEPA
Director General DPAW
Swan Regional Ecologist DPAW
Director Assessments DOE
Assessments WA DOE
DOW
Groundwater hydrology DER

P O Box 326 West Perth WA 6872 9420 7207

ubc@bushlandperth.org.au

www.bushlandperth.org.au