

30th January 2012

The Hon. Tony Burke MP
Minister for Sustainability, Environment,
Water, Population and Communities.
Parliament House
Canberra
ACT 2601

Dear Minister

Imminent release of PER for Gateway Vision project - Tonkin Highway and other roads, Perth Airport

The Urban Bushland Council (UBC) is a peak community conservation body with over 60 member groups. The UBC encourages the protection and appropriate environmental management of bushland areas in and around the Perth Metropolitan Area and in other urban centres in Western Australia. The Council participates in research and public education projects and has been active for well over a decade.

The UBC has long taken a keen interest in the protection and environmental management of the remnant natural areas at Perth Airport and is actually exceedingly disappointed at the amount of clearing that has occurred at Perth Airport since its privatisation. The Gateway Vision project is yet another proposal affecting Perth Airport that envisages the clearing of large areas of high conservation value bushland and the construction of roads and associated infrastructure which will have on-going deleterious environmental impacts on surrounding bushland areas.

The UBC wrote to you on 23 August 2011, expressing concerns regarding some ideas for environmental offsets that were being flagged by the Gateway Vision proponents – Main Roads WA – at their Environmental Reference Group meetings. We received a reply, dated 16 September 2011, in which you suggested the UBC provide a submission on the *Draft Environmental Offsets Policy* then open for public comment. The Council subsequently prepared a submission, dated 19 October 2011, and sent it to Canberra.

Commonwealth Offsets Policy ignored

However, at Gateway Vision's final Environmental Reference Group meeting on 18th January 2012, which was dedicated to providing something of an outline of the PER we were told is to be released in the near future (under the EPBC Act), it was evident that the same unacceptable offset strategies were still being pursued and that the proponents had taken no special note of the *Draft Environmental Offsets Policy, 2011* and that it was probable they had not even referred to the same. This is very disappointing and we draw your attention to this matter.

We are not going to rehearse all the points we made in our submission on the *Draft Environmental Offsets Policy* but we would make the point that even though the UBC actually objects to the employment of environmental offsets in principle, where they are to be employed there should be rigorous guidelines to make sure they are not essentially useless, of transient value, hopelessly diffuse, undeliverable, or primarily designed to satisfy the semi-political interests of the major

beneficiary of the offset in terms of land acquisition – generally a state government body with purported environmental expertise and credibility. We would strongly object to any “offset” funds being given to the Perth Airport leaseholder for so-called environmental management of conservation areas as this work an essential part of their responsibility as a leaseholder anyway. The UBC was active when Perth Airport was being privatised and we know the bidders were all aware Perth Airport had valuable natural areas of national significance that would have to be protected and managed.

Offsets at Airport

Despite raising questions at the Gateway Environmental Reference Group, we are yet to see any credible explanation as to why bushland at Perth Airport itself is not to be set aside as an offset (that it is not the Perth Airport site that has been identified for direct land offsets is about as much as we know about the location of proposed offset reserves). The Perth Airport leaseholder will be a major beneficiary of the Gateway Vision project and yet taxpayers are to fund the road projects and they are also to pay for the environmental offsets. The UBC is aware that Perth Airport is on Commonwealth land but the leaseholder derives the income from the land and should be required to forego development of some areas previously identified for development in the *Perth Airport Master Plan*. Because of confidentiality issues the UBC is not in a position to even know what specific offsets are being contemplated in terms of land acquisition, so how are we supposed to provide informed comment on their appropriateness?

Rare and endangered species and communities

Another issue causing the UBC considerable concern is the inconsistency between the identification and listing of rare and endangered species and communities by the Commonwealth and the species and communities classified as being rare or under threat by the State. Given the geographic isolation of the south west of Western Australia in particular, and its consequent levels of endemism, how could any species or community classified as being rare or endangered or in special need of protection at the State level not also qualify for such classification at the Commonwealth level? This appears to be less a matter of science than of politics and the UBC would like to know how this situation is to be explained.

Critical habitat for endangered species

The UBC is also unable to understand why the Commonwealth has demonstrated such a reluctance to identify and protect “critical habitat” for endangered species as there are provisions for this conservation strategy under the *EPBC Act*. Western Australia’s endangered black cockatoo species appear to be running out of appropriate habitat at a frightening rate and it would appear to us that the objective of saving these species from extinction will only be achieved by protecting their existing habitat and possibly constructing some more of the same. On the matter of identifying cockatoo habitat, we find it frustrating to see lines being drawn on aerial images of bushland which purport to demarcate those portions of the bushland that can be described as “cockatoo habitat.” We noted this practice being employed in the Gateway Vision PER briefing and while such a strategy might be useful for identifying areas to be protected in road construction, splitting habitat areas up so precisely and then claiming “only this area of cockatoo habitat is affected” when describing the project’s total impacts is quite nonsensical and essentially misleading or indeed incorrect. Our members observe these birds feeding around Perth very frequently and we are well aware they feed on such a variety of native tree and shrub species that identifying their habitat is not simply a matter of highlighting those areas that are dominated by proteaceous species, for example. The cockatoos’ habitat sits within an ecological context and it can hardly be separated from that context except for the purposes of minimising provisions for their survival.

Recent bushfire and call for flora survey

The UBC would also wish to draw your attention to the fact that a very large proportion of the area to be affected by the Gateway Vision project's proposed extension of Leach Highway into Perth Airport, which forms part of the subject matter of the PER, was burned out in a bush fire on January 4th, this year. This fire burned out a substantial area – we understand up to 60 hectares – and devastated much of the bushland that will be affected by the proposed road works. We have heard Perth Airport staff claim that some of the areas burned had not been burned “for perhaps one hundred years.” As implausible as we may find such claims, the UBC does not doubt that some of those areas have not been burnt out for some years. We have written to the Perth Airport leaseholder requesting a report on how this fire came to burn out such a large area and hope this will be forthcoming.

We raise this issue because the fire presents opportunities for the flora surveys of the area subject to the PER to be made more comprehensive. Fire brings up various native plants, such as orchids, that may be undetectable under normal conditions and we therefore insist that further flora surveys be undertaken in the coming winter and spring as there may be listed endangered species, such as *Caladenia huegelii*, extant but as yet undiscovered in the bushland.

These surveys should be carried out before any decision is made to approve the project.

We look forward to your response.

Yours faithfully

Vice President
Urban Bushland Council WA Inc

cc SEWPAC compliance
DEC WATSCU
Premier WA
Wildflower Society WA
CCWA