



9 April 2017

Master Plan 2014 Minor Variation
 Perth Airport Pty Ltd
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Dear Sir/Madam

Submission: Perth Airport Master Plan 2014 Preliminary Draft Minor Variation

The Urban Bushland Council presents the following submission regarding the abovementioned document. The Urban Bushland Council (UBC) is the peak community organisation for urban bushland with over 70 member groups. The UBC has been in existence since the mid-1990s and has primarily acted as a community advocate for the conservation and appropriate environmental management of native vegetation and habitat in and around the Perth Metropolitan Area. The UBC has also participated in scientific research projects and has brought relevant scientific research to the community's attention by means of conferences, forums, symposiums and various publications.

Environmental Issues and Perth Airport

The UBC has taken a close interest in the protection and management of the natural areas at Perth Airport since the group's inception as the site has long been recognised as an area of special environmental significance. Over the past two decades the UBC has commented on any number of development proposals and plans as regards their potential effects on Perth Airport's natural areas and it has been a source of immense frustration to see more and more destruction of irreplaceable natural heritage and – quite extraordinarily – an actual deterioration in the provisions made for its protection in airport planning documents. The primary case in point is undoubtedly the *2014 Perth Airport Master Plan*. The contrast between this document's treatment of the airport's natural environment and that evident in the *2009 Perth Airport Master Plan* – and the other two preceding Perth Airport Master Plan documents approved since the airport's privatisation – is remarkable and extremely disturbing.

The **removal of the two large Conservation Precincts from the 2014 Master Plan** and the fact that the airport leaseholder was not even required to produce a separate *Environment Strategy* document but merely refer to general matters pertaining to the environment in a brief final chapter of the *2014 Master Plan* clearly indicated the Commonwealth was prepared to accept and approve a dramatic – and totally unacceptable – reduction in the leaseholder's commitment to protection of the airport's natural environment. Our representatives have heard Perth Airport's attempts to spin this change as an environmentally benign or neutral initiative but we are under no obligation to accept this misleading nonsense and the Commonwealth's failure to protect the community's long term interests – as opposed to the leaseholder's commercial interests – is nothing less than a national disgrace. That is the Urban Bushland Council's disposition towards the *2014 Perth Airport Master Plan* and the only "variation" we want to see is **a reinstatement of the Conservation Precincts or at least an equivalent area for permanent conservation.**

Permanent Conservation precinct essential

It is high time the Commonwealth required Perth Airport Pty Ltd to establish a permanent conservation

plan for Perth Airport. Successive Commonwealth Transport and Infrastructure Ministers approved *Perth Airport Master Plan* documents with the same large Conservation Precincts included in them over a 15 year period. So it was our perfectly reasonable understanding that the Commonwealth had a settled view that the areas so defined were to be protected in perpetuity. A temporary “Conservation Precinct” is conceptually absurd and it is nonsense to suggest the removal of these Precincts does not represent a betrayal on the part of the Commonwealth of those members of the public who value our natural heritage.

It is stated in the *Master Plan 2014 Preliminary Draft Minor Variation (MPPDMV)* document on page 6 in Section (e), in purporting to demonstrate the proposed variation’s consistency with the 2014 Final *Master Plan* in regard to compliance with “*relevant environmental legislation and standards,*” that “*the area required for the extra 300 metres of runway does not comprise any listed heritage site.*” This is both misleading and not relevant. Banksia woodlands are now listed as a TEC.

Register of the National Estate

At the time of the release of the first post-privatisation *Perth Airport Master Plan* in 1999, an area of 224 hectares referred to as Forrestfield Bushland was Listed on the **Register of the National Estate**. The area in which it is proposed to construct the runway extension lies within this site. It is stated on the Commonwealth Department of Environment and Energy website “Legal status and heritage place list” that:

The Register of the National Estate was closed in 2007 and is no longer a statutory list. All references to the Register of the National Estate were removed from the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act) on 19 February 2012.

However, the website also includes this information:

*RNE places can be protected under the EPBC Act if they are also included in another Commonwealth statutory heritage list **or are owned or leased by the Commonwealth.** For example, RNE places owned or leased by the Commonwealth are protected from **any action likely to have a significant impact on the environment.***

We can only assume this information is correct and that it would apply to Perth Airport – given that it is Commonwealth land. So why has this not applied in this case?

The environmental values remain

The environmental attributes that led to the Forrestfield Bushland being listed on the original Register of the National Estate would be largely evident on the site today. Certainly natural areas of this kind do not simply reappear after being destroyed so we can assume its rarity –given the rate of development of Perth over the past decade and a half – would be an even more significant attribute than it was at the time of listing. The description of the site is still available on the Department of Environment and Energy heritage list database and we would commend it to Perth Airport Pty Ltd. The proposed extension to the proposed new runway – in itself a construction for which we can currently see no justification – would impact severely on these very high conservation value bushland and wetlands.

MNES

1. The plant species *Macarthuria keigheryi*, which is Listed as Endangered under the EPBC Act, occurs in numbers in the area to be cleared.
2. The development would also extend the loss of the **endangered** ecological community: Banksia Woodlands of the Swan Coastal Plain – recently declared (September 2016) a Threatened Ecological Community under the EPBC Act. This is contrary to the federal Approved Conservation Advice to end the

loss (as on page 33) for this TEC and thus should not be permitted by the federal Environment Minister under the EPBC Act.

In reference to such matters, the UBC would like to make it clear it deplores the recent clearing of Banksia Woodlands of the Swan Coastal Plain vegetation in excellent condition for the purposes of constructing a DFO and for diverting the Southern Main Drain to its west.

We can see no reason whatsoever why Perth Airport should have special licence to destroy Threatened species or communities – especially for non-essential, non-aviation related purposes.

3. Carnaby's Cockatoo: the bushland to be cleared is feeding habitat and thus clearing should not be permitted. The population of Carnaby's is fast heading for extinction due to the cumulative net loss of habitat and this must be stopped.

Bush Forever status ignored

The *MPPDMV* makes a number of references to consultation with WA state authorities and to WA Land Planning Schemes (p.6). The UBC notes that airport planning documents hardly ever mention or attach any significance to the fact that Perth Airport is included in Bush Forever (Site 386). Yes, it was a WA state initiative but Perth Airport appears to be very selective with regard to identifying ways in which it conforms to state planning schemes and in which it chooses to address regional concerns. Bush Forever was and is a very important environmental initiative and the UBC is very dissatisfied with Perth Airport's dismissive disposition towards this outstanding and breakthrough environmental achievement.

No Need for new runway

The *MPPDMV* makes the following claim:

Due to Perth's isolation, the viability of many of Perth's international air services depend on linking with connecting networks through hub airports, such as Dubai and Singapore. A Direct Perth to London long-haul flight is proposed to commence operations in 2018 and this service has been described by the WA Premier as a "game changer for the WA economy" (p.4).

It is our understanding that the benefit from this direct flight to London is that it is assumed visitors from interstate will fly to Perth to avail themselves of this service. However, it is also our understanding that new planes to be introduced in the coming years will have such extended ranges that direct flights to London and other major world cities will be possible from the major eastern states cities themselves – meaning Perth's use as a hub for such flights would probably not be necessary. Whether this is particularly relevant to the proposed extension to the proposed runway we don't know, but Perth Airport is in a position to know that more advanced planes in the pipeline will make any special status for Perth as a direct flight hub somewhat temporary.

Ex-premier Barnett was quite vocal in calling for the construction of a new runway and it appears his primary motivation was to address the concerns of resource industries which claimed to be inconvenienced by being unable to maximise worker numbers available for FIFO shift changes. Given most people in WA's regions, and many others as well, would regard FIFO employment as an appalling means of depriving the regions of the benefits of the resources to which they are entitled, and given Premier Barnett's particular attachment to the resources sector, it might be suggested his views were not necessarily representative of those of the general community. In any case, the construction phase in the resources sector has now ended and now there is much less need for FIFO flights. Thus the need for the new runway is now highly questionable.

The UBC has little expertise in economics or infrastructure but we can report that over the years a senior airline official and some senior airport staff themselves have advised our representatives that **a new**

runway would not be required for many decades – if ever. There is however, a political belief that the construction of more infrastructure insures greater prosperity. The financial and environmental costs do not seem to matter, nor does the reality of being saddled with enormous debt – infrastructure is good is the political speak. This may be music the ears of the big engineering corporations but it is our view that the un-necessary environmental destruction in part of our global biodiversity hotspot is totally unacceptable here. The environmental impacts must be the primary factor superior to all others.

Munday Swamp

The UBC supports the protection of Munday Swamp but questions whether this should have to come at the expense of destroying wetlands at the other end of the runway.

Noise Issues

On the matter of noise, it would appear to us that another runway would simply expose more citizens to the annoyance that airports inevitably bring. The proposed runway extension would appear to be likely to expose more residents in the vicinity of the southern end of the runway to noise problems. Attempts to quantify noise exposure from airports is of limited value in the real world. The Government has to pretend it is addressing community concerns with studies and data gathering and analysis and reports but the experience of airport noise – and it is not all from aircraft these days – is a very real thing.

A few flights taking off in the middle of the night may be as disturbing to a light sleeper as repeated take-offs during the day. How any individual will respond to noise exposure is unpredictable and it may even change over time. The plain fact is that residents living near airports or near flight paths are at risk of being exposed to noise that may cause them annoyance, irritation, inconvenience or even anxiety.

Airports should not be located in the middle of cities and properly planned cities would either establish new airports out of town or relocate existing ones to nearby rural zones. In Western Australia authorities have been reasonably successful in convincing people exposed to significant airport and aircraft noise that it is their fault for living where they do. This absurd argument has not worked for many noxious industries forced out of the suburbs and it probably will not work indefinitely for Perth Airport. Citizens live where they live because Government's approved planning and development of their suburbs. Citizens have a right to expect Governments only approve development in locations where it is possible to experience a reasonable quality of life in both the near term and in the longer term.

Conclusion

1. The UBC strongly objects to an extension to a proposed runway in the *2014 Perth Airport Master Plan*.
2. We recommend that this Master Plan is amended such that existing native vegetation on the site not specifically required for essential aviation infrastructure be identified and set aside for permanent conservation purposes.
3. The *2014 Perth Airport Master Plan* represents an unacceptable departure from all the earlier *Perth Airport Master Plans* released since its privatisation with regard to its treatment of the airport's natural heritage and it should be rectified as a matter of urgency.

Yours faithfully

President

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