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Dear Madam

Submission – Draft Major Development Plan – Clearing of Southern Aviation Support Precinct and Construction of Taxiway Charlie Extension

The Urban Bushland Council presents the following submission regarding the abovementioned Draft Major Development Plan (hereafter referred to as the *DMDP* in this document).

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

The UBC has taken a close interest in the protection and environmental management of the remnant bushland at Perth Airport since the group's inception. Very large areas of high quality bushland and wetland vegetation has been cleared at the Airport since the mid 1990's and the UBC has consistently expressed its strong disapproval – both to the Commonwealth government of the day and the airport land managers of the day – whenever projects or initiatives involving serious environmental impacts have arisen. Sometimes we have known nothing about these issues until after the fact and sometimes we have had the opportunity to comment in advance. But over this extended period it has been our experience that protection of the magnificent natural heritage at Perth Airport has run a very poor second to commercial and other considerations in the Commonwealth's weighing up of priorities and we have no hesitation in expressing our disgust over the Commonwealth's failure to protect a greater proportion of the natural landscape that existed on the Airport prior to its privatisation.

It is not the purpose or intent of the Urban Bushland Council to express a view regarding the question of whether privatising the only major Airport in one of the most isolated cities in the world was ever going to be in the national interest but we do know it has not turned out to be in the best interests of the natural environment – unless one believes the best interests of the natural environment are served through very substantial tracts of the same being obliterated to make way for warehouses, workshops, and roads. This outcome may not have been a necessary consequence of privatisation but we see no argument arising that would convince us that Perth Airport contains more habitat for flora and fauna now than it did in 1997. Our members are familiar with the situation on the ground but any scanning of aerial photographs taken then and more currently will bear out this observation most strikingly. It is a small consolation to know that modern technology makes even the most obscure clearing works discernible in the longer term and anyone believing the chant one hears from the Commonwealth about protecting the nation's environment and environmental sustainability should avail themselves of the aerial photographic record of Perth Airport since the late 1990's together with all the studies pointing to the conservation value of its wetlands, its bushland, and its flora and fauna and its listing on the Register of the National Estate. This Commonwealth-sanctioned clearing is, in our view, facilitating the ecological desertification

of Perth by diminishing the conservation values of one of its last extensive inner urban natural remnants.

Despite over many years having presented numerous submissions relating to planning and development proposals concerning Perth Airport, and having sent more than a few items of correspondence to the Commonwealth regarding the same, and despite having met any number of relevant politicians and bureaucrats to express and explain our perspectives on the environmental protection of the Airport, the UBC is hard pressed to recall one single issue upon which the Commonwealth could be said to have responded in such a way as to produce an environmental outcome we would find more acceptable, – let alone acceptable *per se*. This is probably a roundabout way of saying the UBC has very little faith in the public comment processes associated with Airport planning and/or development proposals and it has had many years of experience to validate this scepticism. Why comment processes are undertaken when there is no apparent intention to take any account of them may be attributable to some desire on the part of government to create an illusion of inclusiveness and consultation but it can only have a severely corrosive effect on the confidence of the community in so-called democratic processes in the longer term.

Nevertheless, the council does not resile from its very strong views regarding the importance of protecting as much of the natural vegetation at Perth Airport as possible – meaning far more than is currently set aside for conservation purposes – and it will put these views once again. We are confident history will view our documented position favourably and it is the future that we have in mind. Perth city can have its magnificent natural heritage at least partially conserved and protected or it can annihilate the work of millions of years of evolution for the potential gain of a little more convenience and the financial advantage of a finite number of investors.

The UBC expresses its views regarding its dissatisfaction regarding the physical extent of the natural areas currently set aside for conservation at Perth Airport and its frustration with the fruitlessness of its contributions in consultation and public comment processes regarding Airport planning and development proposals as a preamble to this submission for the simple reason that we feel compelled to convey our vexation regarding a long history of having participated in public comment processes relating to Perth Airport with no evidence whatsoever of our views ever having been taken into account so appreciably as to have had any practical effect on the ground.

The *Draft Major Development Plan – Clearing of Southern Aviation Support Precinct and Construction of Taxiway Charlie Extension*, March 2013 is a very disappointing, but not atypical environmental assessment document released by the Airport leaseholder. The very substantial impacts of the proposal are downplayed, there is a serious lack of detail in the description of the existing environment, and the proposed mitigation or offsets are only vaguely and unsatisfactorily explained. However, if what we understand to be the mitigation measures or offsets to be undertaken or established is broadly correct, from our interpretation of the limited information supplied in the *DMDP*, then we would regard **those offset measures or offsets as being wholly inadequate and unacceptable**. Any works carried out in Conservation Precincts cannot possibly qualify as offsets, primarily because this would not involve any addition to the area set aside for conservation at the Airport but also because the leaseholder is obliged to manage Conservation Precincts, as regards the maintenance and enhancement of their environmental values, as part of their responsibilities as the land manager anyway.

Our comments on the *DMDP* will more or less follow the order of the document itself, though we may vary from its sequence of topics and make other observations and assessments where it is deemed appropriate.

Executive Summary DMDP (p.ii)

The parcel of land involved (49.4 hectares) is considerable in the context of the Swan Coastal Plain portion of the Perth Metropolitan Region and the assertion that only “30.9 hectares has been

mapped as supporting vegetation that is definable as a vegetation community,” (p.ii) does not alter the fact that the full area can, and probably does, provide habitat for important native fauna, and could, in time, become more substantially vegetated with native species. The UBC never dismisses the habitat value of indigenous trees and shrubs in otherwise substantially degraded or “parkland cleared” portions of undeveloped areas for the simple reason that our substantial combined experience and expertise has shown us that native fauna clings to the smallest of vestiges of natural habitat in our urban landscape.

The *DMDP* proposes clearing operations for two fairly distinct purposes. The UBC is not in a position to know how urgent the need for “Taxiway Charlie’s” extension really is but we would be confident its construction is aimed primarily at meeting anticipated “future demand.” The *DMDP* asserts that the extension

‘...must be operational for the relocation of Virgin Australia to the current International Precinct, which is expected to occur in 2014. It has been determined that without the extension of Taxiway Charlie airfield capacity during the peak morning departures would be negatively impacted (p.21)’

The UBC would only make the observation that in recent months it has become more and more apparent that WA’s mining boom and its associated employment opportunities are on a downward trend. Not even highly trained economists can agree on the issue of whether this is indicative of a looming economic slump or a simple “levelling off” process, but we would suggest demand for the fly-in fly-out workforce is already showing signs of decline. If the economy and/or the international economic situation does deteriorate significantly, then we could only assume projected growth in aircraft movements and passengers and freight would have to be adjusted. It would seem to us that forecasts regarding demand for future aviation infrastructure are highly dependent on medium to long term economic projections and forecasts – which are notoriously unreliable in any case. The UBC would object far more strongly to clearing operations undertaken for some “*anticipated aviation demand*” rather than for some demonstrable existing aviation demand that could not be met by utilising some already cleared space. We accept that taxiways tend to be located very adjacently to runways but we would expect the Commonwealth to apply some scrutiny as to the urgency of the requirement for this facility.

The clearing of native vegetation in the “Southern Aviation Support Precinct” for the future construction of aviation-related buildings would seem to us to have a more problematic justification. **If there are no specific proposals to build such infrastructure in the area, why is it necessary to clear the site now?** It is stated under the heading “*Proposed Development under this Major Development Plan*” (p.2) that “*the extent of the project area, including the delineation of the Southern Aviation Support Precinct and the Taxiway Charlie extension is shown in Figure 3.*” Figure 3 appears to show the full project area but it does not show “*the delineation of the Southern Aviation Support Precinct and the Taxiway Charlie extension..*,” as is claimed. Figure 12 shows the delineation of the Taxiway Charlie Extension but in an image that does not show the full project area. On page 21 it is stated that “*the full extent of the area to be cleared is highlighted in Figure 4.*” Figure 4 (on page 5) **is, in fact, a diagram referring to Passenger Forecasts and contains no reference to clearing at all.** The compilation of the *DMDP* leaves a lot to be desired and although we are a good deal more interested in the substance of the document than its spelling mistakes, diagrams should be referenced correctly. The proponent’s references to “*two distinct components of the Southern Aviation Support Precinct and the construction of Taxiway Charlie extension*” are confusing. From our perspective, the two main components of the proposal are one relating directly to the physical movement of aircraft (the Taxiway extension) and one relating to some anticipated demand for aviation support services – clearing vegetation for buildings and roads.

It has always been the UBC’s very strong view that **clearing for aviation facilities should only be undertaken when those facilities have become necessary for the operation of the Airport – not in anticipation of them becoming necessary for the operation of the Airport.** We were disgusted

when the concept of “interim development” emerged some time after airport privatisation had been undertaken in Australia, as we had received assurances from the airport leaseholder that land reserved for aviation purposes would not be cleared until it was actually required. It is our very strong view that clearing necessary for aviation purposes should only occur when there is a demonstrable need and where there are specific proposals for construction works that could not be accommodated elsewhere on previously cleared land.

The UBC has long objected to the Airport leaseholder’s persistent practice of referring to land set aside for conservation purposes at Perth Airport as if it constituted some kind of justification for any and all clearing works undertaken outside of those areas. The UBC has never been satisfied with the extent of the natural area set aside for conservation at Perth Airport and has been quite horrified by the extent of clearing that has occurred since the late 1990’s. The Council has consistently called for the expansion of the areas set aside for conservation at Perth Airport since the Airport was privatised and neither the leaseholder nor the Commonwealth have made any concessions on this issue over a very long period. But our resolve and our insistence that that magnificent natural areas at Perth Airport have been unacceptably dealt with remain as strong as ever. It is stated in the Executive summary that,

'More than 30 percent of the non-aeronautical zoned land on the estate has been designated for conservation purposes. These areas are reserved due to their environmental and cultural significance and are representative of the environmental values that are present across the estate (p.ii)'

This implies the Airport leaseholder’s environmental responsibilities regarding reserving land for conservation purposes have already been met but this would only be the case if their own *Master Plan* was the sole authority and reference point. It is not.

A vexing problem the UBC has experienced over a considerable period in dealing with the Airport leaseholder and even with the Commonwealth’s Airport Environmental Officer (a number thereof) is an interpretation of the *EPBC Act*, and even the *Airports Act*, for which we can see no justification. It is our very strong view that a potential environmental impact does not have to be “of national environmental significance” to trigger *EPBC Act* assessment if that impact is “on Commonwealth land.” Perth Airport is on Commonwealth land and it is completely unacceptable for the Commonwealth to claim, through its representatives, that an environmental impact “has to be of national environmental significance” to trigger either the *EPBC Act* or a Major Development Plan. Under this interpretation, the Commonwealth effectively awards itself far lower environmental standards than would prevail under a State regime and this is nothing short of a disgrace. We note the “on Commonwealth land.even if that significant impact is not one of the eight matters of national environmental significance,” provisions of the *EPBC Act* are actually mentioned in the *PDMP*, on page 8. We can only repeat that we have had officers employed by the Commonwealth to oversee environmental compliance at the Airport doggedly insisting these provisions do not exist and/or do not apply. In our experience these provisions certainly do not appear to be applied but we do not see the legal justification for this approach. Nonsensical claims that clearing of tens of hectares of native vegetation doesn’t constitute a “significant impact” rankle similarly and they make a mockery of environmental protection processes.

Some years ago the UBC devoted some considerable time and energy lobbying to have Perth Airport brought under the State’s environmental protection system but despite some assurances that things were moving in that direction, nothing came of it. Consequently, clearing operations at Perth Airport have continued largely without formal assessment and without the public consultation that could be expected under a State regime. Environmental protection legislation is an essential part of any civilised nation’s legal framework but the *EPBC Act*, together with the manner in which it is applied, inspires more dismay than confidence in those who actually care about this nation’s natural heritage.

The Urban Bushland Council has been pressing for greater protection of the habitat of Carnaby's Black-Cockatoo in the Perth Metropolitan Area for many years. The Council, therefore, has no doubt that proposals involving the clearing of substantial areas of potential habitat for this species at Perth Airport should trigger a Major Development Plan and/or the *EPBC Act*. But it is our very strong view that it should not require impacts on the Endangered Carnaby's Black-Cockatoo, or any other Endangered species, for environmental assessment processes involving public comment to be initiated. The sheer extent of bushland and wetland clearing inherent in the proposal which is the subject of the current *DMDP* should be deemed to be of such environmental significance as to warrant environmental assessment processes under either the *Airports Act* or the *EPBC Act*. It is extraordinary that we should be in the position of calling for environmental assessment standards and processes to be more in line with those that would apply at the State level, in a State that is notoriously pro-development and which is commonly represented in Eastern States media as having a "frontier" character and a "cowboy" mentality.

Federal ministers and bureaucrats could hardly be more removed from Perth and we are well aware signing off on the destruction of a few more hectares of scrub at Perth Airport is a matter of very little moment in Canberra but it is one example of remote administration promising some exceedingly poor outcomes in the longer term. Quite huge expanses of ideal feeding habitat for Carnaby's Black-Cockatoo have been cleared for non-aviation related development at Perth Airport over the past 15 years when it has been relatively common knowledge that the species' population has undergone an enormous decline, primarily through the clearing of its habitat. The Swan Coastal Plain is a major portion of its natural habitat, the Coastal Plain has been extensively developed and cleared, and the massive and ever-expanding urbanised part of the plain has a dismally small number of large feeding habitat areas remaining. Perth Airport is one of those areas. This point has been made in any number of submissions regarding Perth Airport, and numerous other sites, presented by the UBC over the years but Commonwealth seems determined to set yet another Australian species on the path to extinction.

Offsets

The Executive Summary states that "*PAPL will continue to identify suitable on-site offsets that provide a net environmental benefit and are reflective of our long term management of on-site environmental values*" (p.ii). The UBC wishes to make clear its vehement opposition to the practice of using so-called offsets to justify environmental destruction. The Council's aversion to the emergence of this concept as a means of guaranteeing approval for just about anything stems partly from the indisputable observation that natural landscapes, including their flora and fauna, are natural because they are formed by complex natural processes over a very long period of time. And there is no real substitute for those processes. There is simply no way of recreating a naturally evolved landscape in one year, or two years, or fifty years.

When it comes to the natural environment there is no satisfactory alternative to natural processes and the fruits of those natural processes.

So once it is established that a natural landscape cannot really be resurrected elsewhere or in situ, it then becomes a matter of determining whether environmental destruction can be compensated for by some other environmental initiative. The UBC is aware of a wide variety of so-called "offset" concepts and has come to the conclusion that "offsetting" itself should be treated as an alternative of absolute last resort. Where relevant authorities at State or Federal level decide a proposed development threatening a natural area is so demonstrably essential and vital to the public interest as to be virtually unavoidable, then a strategy of employing "offsets" might meet with our reluctant approval. In such rare instances, the nature of the offsets would be of critical concern and would determine whether any real advantage to the environment could be achieved. Unfortunately, offset strategies have been employed in environmental approval processes far more frequently, at far lower thresholds, and far more liberally than we would ever have regarded as being appropriate. It

would be our observation that, for the bulk of the conservation community, the practice of employing offsets in approval processes has become largely discredited and infamous.

In the UBC's experience, offsets frequently involve other sites considered to be of environmental value by government agencies, being secured for conservation purposes in perpetuity. Or they can involve proponents paying for the environmental rehabilitation of some degraded space(s). Or they can involve proponents paying for regeneration or environmental management initiatives in existing conservation areas. Or they can simply involve proponents funding vaguely related research initiatives, or sundry environmental projects, including community tree planting. All of these concepts have serious problems – some more than others. However, it is the UBC's view that the only acceptable offset, and then only in the rare instances where the clearing of native vegetation is completely unavoidable, is land for land. By this we mean **if a parcel of land is to be cleared of native vegetation, then a more extensive area of land, similarly vegetated and adjacent to the impacted site, should be acquired and reserved for conservation purposes in perpetuity.**

The UBC has long advocated the setting aside for conservation purposes a much greater area at Perth Airport than is currently set aside in its two main conservation zones. The *DMDP* does not specify what offsets are proposed for the clearing associated with the development of the Southern Aviation Support Precinct and the Construction of Taxiway Charlie and only refers to them as being "*on site*". The UBC wishes to make it very clear that we would regard **any offsetting package that did not include the reservation for conservation of a much greater area of extant native vegetation on Airport land than currently is the case as being totally unacceptable.**

Perth Airport has suffered major losses of good quality natural areas for development over the past decade and a half and there are very significant environmental impacts afoot in the form of the Gateway Project. Furthermore, Main Roads WA is currently clearing a large portion of one of the most pristine wetland areas in the region on land that was excised from the Airport estate for road construction works (the Abernethy Road-Tonkin Highway On-Ramp). There have been any number of significant clearing operations at Perth Airport that the Council has regarded as being environmentally indefensible and it is still going on. The UBC never took the view that the Airport leaseholder's responsibilities to conserve native vegetation and habitat ended with its drawing up of conservation zones in the release of its first *Master Plan (1999)* and no responsible Commonwealth government would have taken that view either. We were fed all kinds of rubbish in meetings about "ecologically sensitive development" and so forth but Airport development has been characterised by moonscape clearing of the worst kind. The native vegetation is bulldozed over and chipped, the site is levelled and drained.

1.3 Need for Proposed Development

The UBC would make the point that Airport growth would seem to be very much linked to economic growth. Present indications are that jobs are being lost in the mining industry and the State's economy as a whole is entering a downturn. The fortunes of the resources sector, which is such a driver of the WA economy, are governed by many factors which are completely beyond its control. Growth forecasts for the WA economy could easily be spectacularly wrong because of its dependence on international circumstances. It is therefore our view that forecasts regarding Perth Airport's future growth, at least in terms of its aviation activity, would involve some considerable reliance on unreliable extrapolations.

The UBC is very wary of developments being undertaken on the basis of demand that is anticipated but not proven. In the early 1990's it was our expectation that environmental approvals would become more rigorous and difficult to obtain in the future. This has not occurred, especially in relation to Perth Airport, but we are confident land clearing and other environmentally destructive practices will come under much greater scrutiny once it becomes more obvious to policy-makers and the general public that "climate change" is not a conspiracy or a hoax but very probably an

impending disaster. On this matter the UBC looks to the findings and predictions of eminently qualified and disinterested (in the correct sense) scientists – just as we do when it comes to the protection of our flora and fauna. We do not want any clearing “brought forward” on the basis of dubious forecasts or for the purpose of creating a demand where none exists. The document admits *“future demand and timing for the development of the new hangar facilities within the Southern Aviation Support Precinct is difficult to predict..”* (p.6) but then goes on to state *“Although the occupancy of the precinct is still subject to commercial agreements PAPL is confident the timeframe to deliver long term infrastructure, including hangars, would be delayed and consequently may have a negative impact on the efficient operations of airlines relocating to the consolidated terminals and to the overall capacity of the runway system.”* (p.6). **But if there is not a specific proposal for a specific area of land why should it be cleared?**

1.3.2 Demand for Additional Taxiway Infrastructure (p.6)

The PDMP admits that *“the extension of Taxiway Charlie will not increase the overall capacity of operations at Perth Airport,”* but goes on to claim, *“it will ensure an adequate level of service and that aircraft movement capacity on Runway 03 for peak morning departures is not compromised”*(p.6). Again, we would suggest fly-in fly-out movements may decline significantly in the event of a prolonged mining industry slow-down so those *“peak morning departures”* may not be as problematic as might have been anticipated even a few months ago. The argument that *“taxiway routes should be as simple as possible to avoid pilot confusion,”* (p.5) has some merit but passengers might be more than concerned to know that pilots expected to be able to negotiate their way around exceedingly complex instrument panels might be at risk of being confused by “taxiway routes” no matter how labyrinthine they might be. Two main runways would not seem that complex a system to manage but that is not to deny genuine safety issues associated with such carriageways are worthy of consideration.

1.3.3 Impact on Aviation Safety

On the matter of “genuine safety issues,” the UBC is a great deal more sceptical regarding the aviation hazard purportedly posed by Black-Cockatoos visiting the proposed development site. Representatives of the UBC have met with many Commonwealth Officers and many and various Perth Airport managers and staff and their consultants regarding Perth Airport over many years, and has **no recollection of the Black-Cockatoo ever having been referred to as an aviation hazard.** The UBC has made verbal inquiries regarding bird management issues at Perth Airport over this extended period as a matter of interest in terms of the environmental implications of any bird hazards posed by natural habitat and regarding the extent to which birds are subject to any lethal or potentially harmful control measures – our member groups being generally interested in the conservation and welfare of native birds. **The feedback we have obtained has never referred to Black-Cockatoos or any other “bush bird” as posing any specific hazard.** We have always been advised that the birds of concern were invariably those that were habitually inclined to occupy large, open and cleared grass areas such as typically occur at airports, or golf courses, or race courses, or in large, cleared parklands, or in farm paddocks. A habit of occupying large grassed areas is not one the UBC, or any authority we know, would associate with the Black-Cockatoo.

For some time, representatives of the UBC were in the habit of attending an Environmental Consultative Group established by WAC. The UBC withdrew from the group when it became apparent it was not serving any purpose that justified the expenditure of time incurred by the said representatives and that WAC and the UBC fundamentally differed on the point of the purpose of the “consultative group.” We understood it had been initiated at the suggestion of the then Federal Member for Belmont, Mr Kim Wilkie, to enhance community consultation regarding

contentious environmental issues primarily pertaining to the protection and management of the natural environment at Perth Airport. But we were advised by WAC's senior representative, after having attended numerous frustrating meetings, that the purpose of the group was merely to give the community an opportunity to comment on the management of its designated Conservation Precincts. Out attendance ceased forthwith.

However, we did derive some interesting information from a few presentations that WAC's representatives delivered at those Environmental Consultative Group meetings. At least one was on a major environmental initiative referred to as the "Living Stream" project. To our **knowledge this "Living Stream" project – in its full conceptualisation - has never made it off the drawing board and the Commonwealth should be asking why.** The UBC always favours the preservation of natural areas over the attempted recreation of landscapes using various earthworks and indigenous flora – as appeared to be the case with the respect to the "Living Stream" concept and its proposals associated with Perth Airport's Southern Main Drain on either side of Horrie Miller Drive – but something is better than nothing. So far the "Living Stream" project has been more "nothing" than "something" and we are curious as to why this proposal, which no doubt earned WAC some valuable environmental credits in certain quarters, has never come to fruition. The Southern Main Drain flows through the area proposed for clearing but we only see references to it being replaced by a pipe (p.31).

We have more to say on the subject of the Southern Main Drain but on the subject of presentations WAC delivered to the Environmental Consultative Group and the matter of birds and hazards to aviation, one talk we received at one of those meetings was on the topic of bird management at the Airport – specifically related to the issue of managing the risk of bird strikes on a day-to-day basis. Uncharacteristically, it was a very interesting and informative exposition and the presenter impressed the attendees as having some knowledge of his subject. We cannot rehearse every aspect of the presentation but having seen and heard the issue of bird strike raised on a few occasions, without much conviction, by the leaseholder as an argument against the conservation of natural areas near the runways, we took very careful note of the facts as presented by someone dealing with the issue directly.

The presenter said nothing that implicated any bird that habitually occupies bushland. Rather he stressed the particular hazard posed by birds that favour large, open grassy areas such as those surrounding the runway. These birds included magpies, galahs, kestrels, plovers and sundry other species attracted by the strictly artificial environment – the grassland – associated with the airport infrastructure. To the incidental observer, the vast number of Rainbow Lorikeets visiting the trees around the Domestic Terminal every evening would quickly come to mind as a potentially significant aviation hazard. But our advice was that they were not considered a particular problem at all and that very careful analysis of damaged aircraft engines tended to implicate the same old species time and time again – the aforementioned species habitually occupying grassland around the runways.

It is true that a flock of Black-Cockatoos flying in the vicinity of a runway could produce an instance of bird-strike but so also could a flock of pigeons, or crows, or ibis, or white cockatoos, or black ducks, or any other kind of bird that might be seen in flocks in the Perth region. References to the potential aviation hazard posed by the presence of Black Cockatoos in bushland in the vicinity of the runways in the *PDMP* are somewhat curious in light of a feature of Perth Airport that apparently has not caused any concern to date and that is the presence of a fairly large grove of large exotic pine trees located towards the southern end of the main runway, not far from Tonkin Highway. Such large pine trees are known to be a magnet for Black Cockatoos and our members have seen the birds flocking around this grove. The obvious presence of these large trees near the main runway, and their well-known attraction for Black Cockatoos, does not appear to have raised any fears among Airport authorities in the past and it is therefore our suspicion that the *PDMP* refers to such issues as they relate to bushland mainly for the purpose of attempting to justify clearing operations. We are not advocating the clearing of

the pine trees as the loss of large, mature trees in the urbanised parts of the Perth region is an on-going problem whether the trees are indigenous to the region or not.

The *PDMP* states that:

'In 2011, PAPL engaged ornithologist Mr Bill Rutherford to investigate the positive and negative impacts of vegetation removal of the airside areas in close proximity to the runways. Due to the size of Black Cockatoos, this species has a "Very High" risk rating. The report concluded that removal of the airside bushland would have an overall positive effect in the reduction of wildlife hazard risk at Perth Airport and the mitigation measure should be the removal of Black Cockatoo feeding areas' (p. 7).

The UBC has already made clear its views on the hazard allegedly posed by Black Cockatoos (and other bush birds) **and is appalled that a land manager would actually try to use the presence of an Endangered species to justify the clearing of native vegetation.** The Council trusts the Commonwealth will give this self-serving humbug the credence it deserves. The Airport leaseholder has cleared vast numbers of habitat trees these Endangered birds could now be using in the landside areas – what was the justification for that? Trees kill many motorists and their passengers every year – but we have not noticed any diminution in the enthusiasm of relevant authorities for planting them – not only on the sides of roads but in the middle of them as well. There is a slight risk that Black Cockatoos could be involved in a bird strike incident at Perth Airport but the leaseholder should be encouraged to know that the various Black Cockatoo species' populations are now only small remnants of their original numbers. All appear to be in steady decline – largely because of the destruction of their habitat.

2.5 Perth Airport Environment Strategy

The UBC has never regarded any *Perth Airport Master Plan* or *Environment Strategy* as being worthy of approval on environmental grounds and has made this point in submissions time and time again. We have never been satisfied with the amount of native vegetation set aside for conservation and we have been dismayed at the “clear everything” approach taken to development. The *Environment Strategy* documents contain only vague environmental management commitments and a less inspiring collection of generalised statements, clichés, empty motherhood statements, jargonised references to “systems,” and glib assurances that would be difficult to assemble. We therefore strongly object to the statement that

'The MDP is consistent with the Environment Strategy 2009-2014, as the clearing of Southern Aviation Support Precinct and construction of Taxiway Charlie extension is not within an Environmentally Significant Area or located within the Conservation Precincts as identified in the Environment Strategy 2009-2014' (p.11).

The UBC regards all the natural areas at Perth Airport as being “very significant” and does not view the *Perth Airport Master Plan* or the *Environment Strategy* as documents likely to represent the Airport's natural heritage values in their best light – unless those values happen to be manifest within designated Conservation Precincts. We know very well that very large natural areas that were of no less conservation value than those existing within Conservation Precincts have been cleared at Perth Airport since the Precincts were identified, and we also know that there are large natural areas currently existing outside the Precincts at the Airport that are of no less conservation value than those within them. This is not to say they are the same, or that they have the same attributes, but they are just as important and we very much resent and reject the leaseholder's persistent practice of claiming the demarcation of the Conservation Precincts relieves them of any further responsibility to set aside land for conservation purposes. Our knowledge of the site generally and the evidence of aerial photographs, together with the descriptions of the vegetation in the *PDMP*, indicate the area subject to the *MDP* contains a large total area of bushland that we would consider to be of high conservation value. It clearly contains wetland (dampland) vegetation

–wetlands generally being given a conservation priority in WA being classed as '*Conservation Category Wetlands*' (CCW) (which should not be developed, but retained)– and we believe it would have strong fauna habitat values in addition to providing habitat for Carnaby's Cockatoo and the Red-Tailed Black Cockatoo.

Planning Overview (p13).

The Planning Overview section of the *PDMP* lists various plans and strategies it conforms with and we recognise some of them as planning initiatives upon which the UBC has lodged submissions. In our experience, lodging submissions regarding such initiatives gives every visible indication of being an exercise in futility. But such is the UBC's belief in the importance of civil society, where time permits, we take the trouble to review these documents and put our point of view.

We generally do not regard State planning documents as being as sympathetic to the cause of protecting Perth's natural heritage as we would wish – and that is an understatement. It is, therefore, not all that surprising that the Airport leaseholder can quote elements of such documents to illustrate the conformity of their development proposals to broader State planning priorities. But in truth Perth Airport is quite an anomalous planning issue. It is not subject to State jurisdiction and can initiate development that creates problems for State planners and Local Government Authorities with impunity. There is something very strange about massive industrial and commercial estates being established on land without any apparent consideration for the practical capacity of the surrounding road system to service them – but this has occurred at Perth Airport and now taxpayers are to fund major upgrades to this road system as it has become a congested mess. Notably when this process of commercial developments commenced, the UBC predicted this traffic chaos as a likely outcome.

Airport planning documents invariably trumpet its importance and potential as a transport hub, a business hub, a commercial hub, and as an employment hub. But it can also be viewed as a huge transport obstacle – being a major physical barrier in a very large, built-up area not far from the CBD. It can also be viewed as a noisy and polluting behemoth that detrimentally affects the quality of life of tens of thousands of residents living near the facility and/ or beneath its flight paths. This problem is glossed over by State planners to an alarming degree and the establishment of more and more residential developments in the vicinity of the Airport and its flight paths points, in our view, to a lack of appreciation on their part of the extent to which noise, for example, can detrimentally affect the quality of life residents for the term of their natural lives or until such time as they would like to reside in some other location where they are not woken up in the middle of night by jet engines, maintenance works, or the reversing alarms of ground vehicles and where they do not have their conversations, television viewing, and telephone calls interrupted on a regular basis by the roar of incoming and outgoing aircraft.

Whenever the UBC has raised questions about air pollution we have been advised by the leaseholder to “ask the airlines” or to refer to the data from some air monitoring station kilometres away in Caversham. Does the leaseholder deny that the kerosene odour emanating from the direction of the Airport across the Belmont area from time to time is indicative of air pollution? No details relating to measured or potential aircraft emissions of particulates or other pollutants appear in *The Perth Airport Environment Strategy* or the *Master Plan*. Why not? We are simply making the point that massive development at Perth Airport brings problems like congestion, noise, and environmental destruction that don't improve the quality of life of Perth residents and that these things should be weighed up against the extravagant bluster about the benefits to the city that accompanies every development proposal. It is our long-held view that Perth Airport is inappropriately located and that it would be preferable to relocate it to some site more removed from the city and its residential land and to a site that is not so environmentally significant and sensitive. Politicians invariably cite the cost of such an initiative as being prohibitive but, in our experience, they do not dispute the point that its present location is less than optimal.

Economic Impacts 4.3.3

The *PDMP* claims the proposed development, “allows the airport to support the potential significant growth in the State economy that is possible with the current infrastructure” (p19). And then goes on to declare;

‘The capacity of the airport facilities to assist managing increased passenger numbers will facilitate growth in the State and result in the realisation of billions of economic development to the State and the Commonwealth’ (p.19).

We doubt the proposed construction of Taxiway Charlie and some aviation support facilities have all that much to do with WA’s economic future and the impression we get is that the aviation support element of the proposal is more orientated to attracting customers than meeting any specific demand. Once again we would make the point that passenger and freight forecasts depend on economic forecasts. And whereas everything we have heard over the past few years has been about the need for more infrastructure and skilled labour to meet burgeoning demand, the mood lately is decidedly more pessimistic.

Environmental Impacts (p.28)

1. Acid Sulphate Soils (p.28)

The UBC does not know what risk there is of Acid Sulphate Soils being disturbed by the proposed development but as the area has a relatively high water table and considerable expanses of dampland vegetation we would expect the potential presence of ASS to be investigated thoroughly prior to any clearing, excavation, or other works. Bassendean sands and associated wetlands generally have a high ASS risk and such areas must never be dewatered (even temporarily) to avoid acidification and release of unacceptable Arsenic, Iron and Aluminium. There is a State Framework for management of ASS and this should be respected as there is potential for wildlife damage and offsite damage via drainage etc.

2. Groundwater Hydrology (p.29)

It is stated in the *PDMP* that “there are no environmental values of significance adjacent to or down hydraulic gradient of the proposed area that are dependent on the maintenance of groundwater quantity and quality.” (p.29) There is no information relating to the hydraulic gradient supplied in the *PDMP* but the high water table suggests any contaminants coming from Taxiways or aviation support facilities might quickly find their way into groundwater. The leaseholder’s perspective on “environmental values of significance” could be quite different from our own. We would assume the Southern Main Drain currently removes some upper level groundwater from the area and that this drainage might be utilised similarly if the drain were to be replaced with a subterranean pipe. Our members are sufficiently aware of industrial sites to know that unintentional chemical spills and seepage problems occur and we would expect rigorous pollution control systems to be in place if this development proposal were to be approved. The Southern Main Drain flows directly into the Swan River and the Swan River has, from our perspective, “environmental values of significance.”

3. Surface Hydrology (p.31)

The existence of two small seasonally inundated wetland areas surrounded by good quality vegetation on the proposed clearing site is significant. It is highly likely that such wetlands are utilised by fauna such as frogs, koonacs and tortoises in wet years especially. It is disturbing to see that a contaminated plume of water still exists in the vicinity of the Perth Mint and that some of this contamination is finding its way into the Southern Main Drain. We were initially told some years ago that the bulk of this contamination was attributable to a fire that occurred at the mint. The UBC has previously insisted that the contamination in the vicinity of the mint should be cleaned up expeditiously but we are not sure what remedial measures have been undertaken and to what effect.

The statement that “*it is anticipated that the SMD will be piped through the site,*” (p. 31) seems to carry with it the assumption that this does not constitute an environmental impact. The Southern Main Drain is an artificial waterway but it still provides habitat and services for native fauna on Airport land. It supports large numbers of tortoises, it has its own complement of amphibious and aquatic fauna, and mammalian, reptilian and avian fauna can use it for drinking water more or less year round. It would be wrong to assert that it has no environmental value in the context of the Airport so that the loss of this surface waterway must be taken into account when determining impacts and offsets. Surface water available for wildlife to drink without being in terror for its life can be very hard to find in summer and the fact that it contains at least occasional pools of water during the dryer months is one of the Southern Main Drain’s positive environmental values.

4. Contaminated Sites (p.33)

The UBC is not satisfied that the *DMDP* provides enough detail on the matter of how the proponent will prevent the contamination from the Perth Mint being spread during excavation and/or possible dewatering operations. The claim that “*management actions will be developed to reduce the risk of increasing the contaminated site,*” (p.33) is well short of the guarantee the contamination would not be spread that the Commonwealth should be expecting. If the proponent cannot provide more assurance than this that contamination will not be spread then the proposal would have to be deemed environmentally unacceptable. We can only assume the proponent’s claims regarding the remediation of the wider contaminated area are accurate but we do know the Airport leaseholder has been aware of this problem for many years and it does appear to be taking some time to be resolved satisfactorily.

5. Flora and Fauna (p.33)

The UBC is surprised and disappointed that a full species list of flora found on the site is not provided in the *PDMP*. And while there are descriptions of vegetation types, there is no real data on floristic communities either. The proponent does cite a number of surveys and studies but most of these are not publicly available and are not provided to organizations such as ours anyway – even if requested. But if the information is so comprehensive, where is the species list? Where is the description of the floristic communities?

30 hectares is a very considerable area of bushland in a relatively inner urban context and if the offset process is to be used as some kind of compensation for clearing we would insist that a lot more bushland at Perth Airport be put aside for conservation. This bushland is in a transition zone between the Bassendean Central and South Vegetation Complex and the Southern River Vegetation Complex and only a tiny proportion of the original extent of both of these Vegetation Complexes currently exists in reserves. Furthermore, native vegetation lying on the eastern side of the Swan Coastal Plain – especially south of the Swan River – has been massively cleared since European settlement. Furthermore, wetlands on the Swan Coastal Plain have been cleared and drained to such an extent that a special conservation status is effectively attributed to them under State environmental assessment processes.

The Commonwealth must respect the environmental values of Perth Airport and must start placing appropriate responsibilities upon the leaseholder to protect natural areas or to come up with offset vegetated land on site for conservation where the clearing of native vegetation is deemed to be absolutely unavoidable.

The UBC finds the following text objectionable and totally unacceptable:

'The vegetation communities impacted and the condition of those communities are representative of the vegetation communities protected within Conservation Precincts 5 and 7. The clearing of 30.9 hectares of vegetation as proposed by the clearing of Southern Aviation Support Precinct and the construction of Taxiway

Charlie extension is therefore not considered by PAPL to be environmentally significant' (p.38). **Indeed this is nonsense.**

PAPL may not consider the clearing of 30.9 hectares of native vegetation as being significant but the UBC considers it so significant as to warrant very substantial compensation – if the clearing is to be approved at all. If the Airport leaseholder can simply point to its Conservation Precincts (a mere 14 percent of Perth Airport's total area) as the justification for all further clearing operations then there is no point in having an *EPBC Act* or environmental provisions in the *Airports Act*. The West Australian State government and its various agencies do not claim to have the right to clear the rest of Western Australia because the State Government conserved Kings Park. The UBC has always regarded Carnaby's Cockatoo as being vulnerable to wide scale clearing of its feeding habitat such as has occurred at Perth Airport since its privatisation but all the research that is now showing that the species is under serious threat has apparently not assisted the leaseholder to form the understanding that unless people stop clearing its habitat Australia risks losing a prominent, much-loved, and eminently salvageable species. Why are Conservation Precincts drawn up in the late 1990's still considered adequate 15 years on when there is so much more evidence of the environmental costs of land clearing?

6. Fauna (p.38)

The UBC has made clear its very strong view that the clearing of the habitat of Carnaby's Black Cockatoo (Endangered) and the Red-Tailed Black Cockatoo (Vulnerable) – both of which occur at Perth Airport – is unacceptable. If the clearing of its habitat is considered vital to the public interest in any particular instance then the proponent should have to prove that the need is immediate and pressing. **The proponent should then have to secure a much larger compensatory area of habitat nearby that has not, to that point, been secured for conservation.** We would also make the point that if these species visit a proposed development site that has a reasonable proportion so vegetated that it constitutes habitat for the species then the whole block should be deemed to be habitat

The UBC is well aware that Perth Airport has a relatively rich fauna – considering its urban setting – and we do not only value those species that find their way onto Lists indicating that they are “significant.” When fauna species are included on Lists it is generally because of the environmental insensitivity and incompetence. It represents failure and whereas there is merit in giving such species special protection, it is the UBC's view that equal attention must be devoted to ensuring that more species do not end up on Lists. **To this end we campaign for the protection of large areas of excellent fauna habitat such as that found at Perth Airport.** To claim such areas are not significant because they do not have this or that number of “Listed” species is ridiculous. Our aim is to keep fauna species that are relatively safe and common for the time being, safe and common into the longer term. But not only will the rarer species decline if their habitat continues to be cleared but more species will be finding their way onto these special Lists.

Perth Airport is a significant regional fauna habitat area in addition to being nationally significant in providing habitat for nationally Listed species. The *PDMP* shows very little evidence of any sensitivity to the lot of fauna likely to be displaced or killed by proposed clearing operations and exhibits no consciousness that a great deal of native fauna utilises natural habitat at the Airport external to its Conservation Precincts.

Perth Airport is, or at least was, a stronghold of the Southern Brown Bandicoot and we find it appalling that instead of protecting its habitat, the Commonwealth accepts these simplistic and repugnant “relocation” projects whereby one population's territory is wiped out and a sample of that population is introduced to foreign environment to compete with any existing population, or to replace any former population, even though it has never had any genetic relationship with either.

This species is severely impacted by Airport development in terms of habitat loss and being killed on roads. The UBC is not satisfied at all that this species receives the protection it deserves.

7. On-site Environmental Offsets (p.46)

The UBC has made its position on offsets clear throughout this submission and it is disgusted with the *PDMP*'s proposition that works in the two Conservation Precincts would amount to acceptable offsets for clearing the proposed development site. The UBC is vehemently opposed to unrelated and piecemeal projects being held up as compensation for clearing. **The leaseholder is already obliged to manage Conservation Precincts for their environmental protection and enhancement as part of core business and operational funding.** That was the understanding of all parties at the time of privatisation as far as we are aware and we spoke to senior representatives of bidders and the Department of Finance on the subject when it was being undertaken. "Protection, rehabilitation works, maintenance works.." (p.46) are what the Airport leaseholder should be doing as part of their basic responsibilities to manage the Commonwealth land they leased. **It is simply wrong to suggest work in already allocated conservation zones could possibly constitute acceptable offsets and indeed is contrary to Commonwealth and State Offset Policy Guidelines.** "The Western Swamp Tortoise" has nothing to do with Black Cockatoos and any works associated with the reintroduction of the tortoise could not possibly be deemed to be of any relevance to the Listed Cockatoo species and could not, therefore, be used for offset purposes. The UBC has clear recollections of the leaseholder's representatives indicating they were "working on the issue of the tortoise" many years ago. Long before "offsetting" was applied as a policy at all.

Conclusion

The UBC rejects the assertion that the significant environmental impacts of the proposal are "limited to the clearing of 13.5 ha of Black Cockatoo habitat" (p.47) and it rejects the assertion that "these impacts are able to be offset by providing a net environmental benefit within the Conservation Precincts 5 and 7 located on the estate" (p.47). The UBC does not have much faith in attempts to precisely demarcate "Black Cockatoo habitat" in proposed development sites and, in any case, we would regard the loss of the native vegetation itself and its associated fauna as very significant and unacceptable. If the proposed development is approved and offsets for the development are to be employed "on site" then the only offset we would accept as having any validity at all would be a significant extension to the area at a ratio of 7:1 at least set aside for conservation at Perth Airport. Nothing less.

Yours faithfully

President