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New Runway Project  
Perth Airport Pty Ltd  
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Dear Sir/Madam

***Submission Preliminary Draft Major Development Plan New Runway Project***

The following is a submission regarding the Preliminary Draft Major Development Plan (PDMDP) for the New Runway Project (NRP) at Perth Airport on behalf of the Urban Bushland Council (UBC).

The Urban Bushland Council is a peak community environmental group which advocates for the protection and appropriate environmental management of native vegetation and habitat in the Perth Metropolitan Region and in other urban centres in Western Australia. The UBC has over 70 member groups and has been active for over two decades.

It should be understood that most of the urbanised parts of the Perth Metropolitan Region lie on the Swan Coastal Plain biogeographic region and this region is a subregion of the larger southwest biogeographic region. The southwest of Western Australia is known world-wide for its floral diversity and for the fact that so many of its plant species are found nowhere else. The UBC makes no apology for opposing developments that will permanently damage what remains of the original ecology of the Perth Metropolitan Region and the Swan Coastal Plain generally and is of the very strong view that the present Commonwealth and State legislative instruments purported to protect the biodiversity of the region, and of the state generally, are manifestly inadequate.

The UBC has taken a keen interest in the remnant vegetation and natural habitat at Perth Airport since the group's inception and put bluntly, Perth Airport is an example of the inadequacy of Australia's environmental protection system. The Commonwealth has

allowed Perth Airport to simply erase the Conservation Precincts that were included in the first three *Perth Airport Master Plan* documents (1999, 2005 and 2009) and areas outside these precincts have been cleared extensively. In fact, some native vegetation formerly included in Conservation Precincts has now been cleared – with no formal environmental assessment. It would be incongruous in the extreme if a group such as the UBC were to see anything satisfactory about this appalling state of affairs and there will be no pretence on our behalf in this submission that the destruction of native vegetation on the Perth Airport site that has occurred over the past 20 years is environmentally acceptable.

The UBC has made it clear in any number of submissions presented in Commonwealth and State assessment processes that it vehemently opposes the practice of using so-called “environmental offsets” to somehow attempt to justify or compensate for habitat destruction. The practice has no redeeming features, it is roundly hated in the community conservation movement, and it does not provide any justification for environmental destruction. It is not the purpose of this submission to canvass the many reasons why environmental offsetting is such an egregious and damaging practice but we would not like the Commonwealth to be in any doubt as to our view that it produces horrible environmental outcomes and that it is a practice that needs to be abolished.

With regard to the PDMDP the submission is in point form:

1. It is odd that Perth Airport should be requiring a new runway at the same time as the WA economy is doing poorly, the population is growing slowly and tourism down. The UBC would be of the general view that Perth Airport is not appropriately situated within the city environment, visiting inconvenient noise upon many thousands of residents, increasing urban air pollution, and bringing the risk of air crashes to built-up areas. It would be preferable to establish a new airport east of the Darling Ranges in an area where there would be less environmental impacts in terms of noise and natural habitat loss.
2. The UBC objects to the lack of full and up to date species lists in the *Flora and Vegetation* and the *Fauna* sections of Volume B of the PDMDP. For a project involving such a large area and having such a profound impact on the Swan Coastal Plain region around Perth in terms of potential flora and fauna habitat loss it is unacceptable that a full and up to date species list for both flora and fauna is not included in the document. This information is of particular interest to parties with an interest in the natural history of the site and it must be pointed out that there is limited public access to the area.
3. The Environment, Heritage and Ground Transport part of the MDP (Volume B) does not devote sufficient attention to trying to contextualise the site in terms of its current ecological significance within the region and provides only a broad scale description of the site itself. If this document purports to present a picture of the existing environment and the potential impacts of the proposed development then surely it should be incumbent on the proponent to describe in detail the likely

ecological impacts of the removal of such a large area of native vegetation and habitat on the region – both within the metropolitan area and on the Swan Coastal Plain generally.

In our experience the EPBC Act 1999, has only ever really been applied at Perth Airport with regard to “matters of national significance,” despite the fact that its status as Commonwealth land should invoke the “protected matters” provisions of the Act which do not require Threatened or Endangered species or communities to be present for assessment to be required. Why Perth Airport should avoid the level of environmental evaluation and scrutiny that would occur at State level via the native vegetation regulations system is not clear to the UBC and it is an entirely objectionable anomaly. Perth Airport and the Commonwealth Environment Officers have never shown interest in the Perth Airport’s inclusion in the WA *Bush Forever* framework but whereas the airport may constitute some kind of legal exception in terms of its status as Commonwealth land this is, of course, utterly irrelevant in any purely ecological context. And it is the “ecological context” that is should be informing the PDMDP’s coverage of the relevant environmental issues.

4. Pursuant to the previous point, it is the predisposition of both Commonwealth and State environmental protection legislation to concentrate on the protection of those species and communities deemed to be rare or threatened. The logical consequence of this poorly-designed system – assuming its authors and apologists actually wanted to achieve environmentally satisfactory outcomes - is that relatively common species and communities are routinely cleared and receive little legislative protection until they are approaching a suitably precarious conservation status. The failure of such systems to provide outcomes that are likely to provide anything approaching an acceptable level of actual protection of the existing environment are obvious and may be illustrated by the fate of the Banksia Woodlands of the Swan Coastal Plain. This once commonplace floral community has only belatedly been given TEC status and even that merely bestows on it the capacity require offset provisions - offset provisions that often involve the purchase of land or habitat that would already be protected if the existing environmental protection system was not so inherently deficient. The trajectory is still towards net loss and the whole environment loses.

The relevance of these observations to the PDMDP is that the treatment of the likely ecological consequences for the region of the massive loss of native vegetation and habitat that is envisaged by the NRP are only superficially covered in the document. It has long been the UBC’s view that Perth Airport is one of the key bushland habitats in the urbanised parts of Perth with regard to the city retaining a reasonable representation of its original native vegetation and wooded wetlands, together with their attendant fauna. Perth Airport’s location on the eastern side of the Swan Coastal Plain south of the Swan River makes it even more important given that native vegetation and habitat in this zone has been so extensively cleared. Large and

varied native habitat areas such as those in the NRP area provide a stronghold and breeding area for large numbers of native fauna species which have either disappeared from smaller bush blocks or which are declining in bush blocks throughout the city. Perth Airport's natural areas are so large as to allow fauna species to withstand impacts like fire whereas such species can be wiped out by fire in smaller blocks. Many bird species are fairly mobile and probably use the native vegetation at Perth Airport as a seasonal habitat in their movements across the Swan Coastal Plain. Given so many native bird species that can be observed at Perth Airport are seldom if ever seen in suburban gardens or even in smaller bush blocks around the city, it is not unreasonable to assume the clearing envisaged for Perth Airport would have a profound effect on the resilience of the populations of numerous birds species still occurring on the Swan Coastal Plain. While it is important to devote special attention to species that are currently considered to be struggling or declining, it is also exceedingly important to ensure that relatively common species remain so. It is in this area that the Commonwealth and State legislation is completely deficient.

5. The PDMDP makes reference to a number of fauna species which may or may not still occur at the Perth Airport. On this matter, the UBC can state that its members have reported that the presence of the Western Spinebill ( Vol. B p.169) has been noted at Perth Airport on more than one occasion in the past two years, though the species appears to be much less prevalent than was the case going back a decade and more. The UBC can also state that the Western Pygmy Perch (p.168) has been sighted by members at Munday Swamp within the past two years. The Western Spinebill is disappearing from smaller bush blocks – even larger ones – across Perth and it is highly likely that habitat loss is implicated. The species probably finds it difficult to compete with other species for diminishing habitat resources. This decline is of great concern as it is one of the most beautiful birds found in the Perth area. On the matter of the Western Pygmy Perch, the species is a surprisingly slow swimmer and it cannot swim upstream against moderately strong currents. Running large volumes of water through Munday Swamp in flood conditions might not be helpful for its continued survival in the wetland.
6. The UBC is of the strong view that at least one part of the NRP project area be subject to an independent botanical survey as it is our view that it may well be “Clay Pans of the Swan Coastal Plain” TEC. Perth Airport lies on the eastern side of the Swan Coastal Plain and it is no further from the Darling Scarp than sites like Brixton Street wetlands, further south, which have clay pan wetlands. It has been the view of our members familiar with Perth Airport that an area of wetland in the NRP zone is very close to being a clay pan wetland. As this area is in a transitional zone between the sands of the Swan Coastal Plain and the alluvial soils of the Darling Scarp, it is not all clay but there is orange silt in the area which is not typical of the Coastal Plain. We will attach an image of part of the airport with the general area to which we refer demarcated but if one refers to Figure 11.8 *Conospermum undulatum* within the estate, 2017 of Volume B of the PDMDP, we are referring to the large wetland area

lying to the immediate north of the ridge upon which the *Conospermum undulatum* specimens are depicted. The very presence of *Conospermum undulatum* in the area is indicative of its eastern SWP character. It is our view that the wetland area specified constitute "Clay Pans of the Swan Coastal Plain" vegetation which is Listed as a critically endangered under the EPBC Act 1999. Species such as *Melaleuca viminea*, *Melaleuca lateritia* *Hakea varia*, *Kunzea recurva*, *Hakea sulcata*, and *Ornduffia submersa*, which are examples of key species indicating clay pan floral communities, have been noted as occurring in this wetland area.

The Federal Airports Corporation's *Flora and Vegetation of Perth Airport*, May 1994, produced by Alan Tingay and Associates contains the following paragraphs:

*Melaleuca Viminea* Open Heath

Several seasonally damp areas have a clay soil either at the surface or very close. These areas contain Open Heaths usually with *Melaleuca viminea* shrubs dominant from 1.5m to 3m tall. Common species in this unit include *Thysanotus triandrus*, *Verticordia densiflora* and *Restio stenostachyus*.

Two small stands of *M. viminea* Open Heath occur on orangey clay soil in the south-east and north of the site. These areas contain *Banksia telmatiaea*, a low spreading *Banksia* species found in winter-wet depressions on the eastern side of the Swan Coastal Plain.

The report is referring to the airport site and the "southeast" stand referred to here is undoubtedly in the wetland area to which we are referring. The soil is clearly orange in parts and it clearly has clay elements or clay just below the surface. We would make the observation that there is heavy clay soil on the airport site just to the south east of Munday Swamp and it is obvious that clay soils and subsoils encroach on the airport site along its eastern margins. The UBC insists that this wetland area should have an independent botanical assessment to determine whether it should be recognised as "Clay Pans of the Swan Coastal Plain" TEC.

7. Munday Swamp is of special Aboriginal heritage significance and has strong natural heritage values also. The UBC is sceptical regarding claims that this outstanding wetland can be retained with its present values after the completion of the proposed NRP. It is proposed that Poison Gully Creek be run into the swamp and that it will receive some drainage from the new runway complex. The UBC sees risks to the area's natural hydrology and risks from pollution. Perhaps our greatest concern is the likely incompatibility of retaining Munday Swamp as an important bird habitat and constructing a major runway right to its doorstep. It is our understanding that Perth Airport already destroys the eggs of waterbirds nesting in the swamp and it is difficult to believe the wetland can retain its character and function as a waterbird habitat with any certainty when it might take only a few incidents of bird strike to have the relevant authorities requiring action to drastically reduce the presence of birds in the area. The bird life is a very significant feature of Munday Swamp's ecology.
8. The UBC is advised by members that the Priority 4 species *Ornduffia submersa* was relatively abundant in open waters in the wetland area we have previously argued

should be classified as “Clay Pans of the Swan Coastal Plain” TEC so it would be surprising if it is no longer found in the area.

9. The UBC is concerned that PDMDP claims that “The presence of the Western Swamp Tortoise on the airport has never been confirmed” (p.171, Vol. B). We are in possession of a report entitled *Survey of the Western Swamp Tortoise and its habitat at Perth Airport* by G. Kuchling and A. Burbidge, January 1996 prepared for the Federal Airports Corporation and the Australian Nature Conservancy Agency. The report commences so:

On 02 September 1970, a juvenile Western Swamp Tortoise *Pseudemydura umbrina* was found on airport property adjacent to Hardey Road. The occurrence of this juvenile, about 20km south of the closest known Western Swamp Tortoise population at Ellen Brook Nature Reserve, demonstrated the existence of a reproducing population of the species on airport land (p.2).

It is difficult to believe the scientists who produced the report were mistaken or that they were not confident of their facts. The report includes some anecdotal evidence that the Western Swamp Tortoise was found in and around the airport but it does not describe the report referred to above as “anecdotal.” None of our members claim to have seen a Western Swamp Tortoise at Perth Airport but several have met people who claim to have done so. There has been a consistent pattern of attempting to deny the environmental significance of Perth Airport’s natural heritage in assessment documents produced by Perth Airport. It is unlikely but not impossible the Western Swamp Tortoise still occurs on the site as those who have worked with the species have observed that it can be exceedingly difficult to find – even when specimens are known to exist in a confined area.

## Conclusion

The Urban Bushland Council does not see that Perth Airport could not continue to function with the present runway layout for years to come. In any case, it is our view that a second airport in a location outside of the city, such as a Cunderdin, would be a better place to build major new airport infrastructure. The present airport site inflicts noise problems on urban residents, it poses a danger to urban residents from air crashes, it pollutes the urban atmosphere and its further development will occasion even more environmental harm in the form of loss of native vegetation and habitat than the appalling amount that has already occurred at Perth Airport since it was privatised. The NRP involves the clearing of so much native vegetation and habitat and the destruction of so much wetland that we believe it will have permanent detrimental effects on the biodiversity and ecology of the Swan Coastal Plain as a whole.

The UBC does not accept that so-called “environmental offsets” amount to any like a worthwhile compensation for the clearing native vegetation and habitat in the

urbanised parts of the Swan Coastal Plain. Many native flora and fauna species and communities are already facing great threats from development, disease and predation and changing the tenure of some far-flung piece of land does not exonerate governments from being responsible for destroying our natural heritage and leaving an impoverished natural environment for future generations.

Please find attached an aerial image indicating an area the UBC believes should be assessed as being "Clay Pans of the Swan Coastal Plain" TEC.

Yours faithfully

Chair

Urban Bushland Council WA Inc

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