



15th May 2018

enquiries@dbca.wa.gov.au

Director General Mark Webb
Department of Biodiversity Conservation and Attractions
17 Dick Perry Drive
Kensington WA 6151
Attention: Swan Regional Manager Benson.Todd@dbca.wa.gov.au

Dear Mark and Benson

Review of Jandakot Airport Master Plan

We understand that the process of five yearly review of the Jandakot Airport Master Plan has commenced as required under the federal Airports Act. Under this Act, the leaseholder Jandakot Airport Holdings Pty Ltd (JAH) is required to consult with State and federal conservation bodies. The EPBC Act is key legislation for regulating development of airports.

In the federal Environment Minister's Approval Conditions for the Major Development Plan of 2009, which was to construct a fourth runway and associated taxiways etc. (EPBC 2009/4796), condition number 3 was that *'the person must conserve in perpetuity all land in Conservation Precincts 1a, 1b, and 2'*.

Now Jandakot Airport Holdings Pty Ltd is seeking to revoke and breach this Ministerial Condition number 3 and to clear 65% of the Banksia woodland which is supposed to be protected in perpetuity under this condition 3. Thus the 119ha of Banksia woodland would be reduced to 43ha after the clearing of 76ha. The purpose is for commercial development, not aviation development. This is totally unacceptable and the Urban Bushland Council calls on you to publicly object to all this proposed clearing, and to insist that there be no clearing whatsoever so that the Ministerial condition is maintained and not breached or modified at all. Our specific recommendations are as follows.

Recommendations

1. Environmental significance

The DBCA and the WA State Minister for the Environment immediately declare as required under section 71 of the Airports Act that the 119ha of vegetation in the currently identified Conservation Precincts 1a, 1b, and 2 is *environmentally highly significant*. It has both Matters of National and State Environmental Significance.

The Matters of State and National Environmental Significance are:

1.1 Bush Forever site 388 comprising Bassendean Complex Central and South vegetation complex which currently has **only 1.2% secured for conservation**, rather than the target of at least 10%. Notably this Bush Forever site included 410.9ha of native vegetation at the time that Bush Forever documents were published and approved in the year 2000. So much has already been lost, and now any further loss is totally unacceptable.

1.2 **Quenda** *Isoodon fusciventer* is a DBCA Priority 5 species and is now recognised as a species in its own right.

1.3 **The Western Brush Wallaby** *Macropus irma*, also known as the black-gloved wallaby, is a DBCA Priority 4 species.

1.4 **Carnaby's Cockatoo**, *Calyptorhynchus latirostris*, is listed as a Threatened species by both the State and under the EPBC Act.

1.5 **Red-tailed Black Cockatoo** – southwest race, *Calyptorhynchus banksii naso*, is a listed threatened species by both the State and under the EPBC Act.

1.6 **The orchid** species *Caladenia huegelii* is listed as rare by the State and under the EPBC Act. Jandakot Airport bushland is about one third of the remaining habitat of this iconic declared rare species.

1.7 *All the vegetation remaining* at Jandakot Airport is now part of the **Banksia Woodlands of the Swan Coastal Plain TEC** listed under the EPBC Act as endangered. The federal Approved Conservation Advice priority protection actions are to *'PROTECT the ecological community to prevent further loss of extent and condition'*. Thus it is imperative that no more clearing of Banksia Woodlands at Jandakot Airport be permitted.

2. No clearing of Conservation Precincts

The DBCA and the WA State Minister for Environment declare publicly that there must be no future clearing or disturbance considered or permitted in the 119ha of Banksia woodland which is located in the currently named Conservation Precincts 1a, 1b and 2 in order to be consistent with the Ministerial Condition 3, dated 25th March 2010, signed by the Hon Peter Garratt MP, Minister for Environment Protection, Heritage and the Arts, in his approval of the referral EPBC 2009/4796. Notably this approval and conditions has effect until 30 June 2097. Condition number 3 states: *'the person must conserve in perpetuity all land in Conservation Precincts 1a, 1b, and 2'*.

3. Transparency: No boundary changes

The boundaries of Conservation Precincts 1a, 1b and 2 must remain the same in the reviewed and revised Airport Master Plan 2019, and in all draft and future Management Plans and in all related documents and drafts thereof. This will prevent confusion and obfuscation of clearing intentions.

4. Maintain transparency: No changes to numbers and thus names of Conservation Precincts

Conservation Precincts 1a, 1b, and 2 must not be renamed, or partly so, or changed to Conservation Precincts 8, 8a, 7a or 7 or any other identification.

Notably JAH is proposing to give the Conservation Precincts new names as follows:

Precincts 1a and 1b changing to 8 and 8a respectively;

Precinct 2 changing to 7 and 7a.

This proposal and changes to boundaries as above will avoid proper transparency of proposals by confusing identity of areas and hiding significant changes to justify and thus seek to allow clearing which is in breach of Ministerial Condition number 3 as above.

5. EPBC Act assessment: DBCA should immediately refer the matter to the DOEE and advise DOEE to call in the proposed revision of the Jandakot Airport Master Plan and associated

Management Plans for assessment as Controlled Actions under the EPBC Act.

In particular, the federal Environment Minister's condition number 3 of March 2010 - '***the person must conserve in perpetuity all land in Conservation Precincts 1a, 1b, and 2***' – must be upheld and thus no clearing permitted.

In conclusion, the Urban Bushland Council WA Inc is most concerned that further clearing and destruction of Banksia woodland at Jandakot Airport that is supposed to be protected *in perpetuity* is proposed. This must be stopped with the assistance of your public advice to the Commonwealth as required under the Commonwealth Airports Act.

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