



NATURE RESERVES PRESERVATION GROUP

13 October 2019

To: Master Plan 2020
Perth Airport Pty. Ltd.
PO Box 6
Cloverdale WA 6985

Subject: Master Plan 2020

Dear Sir/Madam,

This submission is made on behalf of the Nature Reserves Preservation Group (NRPG) Inc. For clarity and ease of reading, sections of the plan (or other relevant documents), will be selected, followed by NRPG 'boxed' comments.

NRPG is an umbrella environmental group based within the City of Kalamunda. For 30 years it has served as a forum for local environmental issues within the Shire/City. NRPG is engaged in rehabilitation projects on some of the City's creek lines which flow into the airport wetlands and thence to the Swan River. NRPG, therefore, makes submissions addressing concerns over environmental issues on the airport estate and on the Swan Coastal Plain.

Since its foundation in 1989, NRPG has made many submissions to the airport, in mostly unsuccessful efforts to protect the natural vegetation on the estate. It has been represented at airport seminars and on community consultative groups and is currently represented on the ACES (Airport Consultative Environment and Sustainability) group.

NRPG has witnessed environmental vandalism on the estate. In 2004, a community forum, 'Wetlands to Wastelands' was organised, attended by airport managers and the Perth Airport CEO. Having listed the airport's environmental shortcomings, the CEO assured the meeting things would henceforth improve. For a while, things did improve. Preservation of the natural environment received more appropriate consideration and the Airport Environmental Strategy (AES) 2009 – 2014, provided a promise of protection of that natural environment.

This submission will refer in detail to earlier publications such as the above strategy, in order to illustrate how far the leaseholders (through a deliberate commercial striving for profitability) and the Commonwealth Government (through ineffective control), have succeeded in subjugating the praiseworthy environmental aspirations stated in such publications.

The AES 2009-2014 was a comprehensive, stand-alone document, separate from the Master Plan. NRPG, always highly critical of any clearing of remnant bushland within the estate, was encouraged by the general tone of the Strategy's executive summary and with the extent and thoroughness with which the Strategy appeared to address many concerns.

With the Master Plan (2014–2019) requiring the Environmental Strategy to be incorporated in that Plan, the stand-alone nature of the Strategy disappeared. It was now effectively emasculated.

The Conservation Precincts, previously considered an essential part of the estate worthy of preservation and, benefitting from projects carried out by the dedicated environmental staff, were to be absorbed into: *“redefined precinct boundaries on the airport estate. Conservation will now be a land use in each of the five airport precincts and will be a consideration of detailed land use planning. Perth Airport will consider wildlife corridors and vegetation connectivity when undertaking detailed planning works within the five new precincts”*. (Perth Airport response to NRRPG Master Plan submission. 6 March 2015).

The importance of these Conservation Precincts was recognised by the Howard Government’s Minister for the Environment, Ian Campbell, in his 2005 response to NRRPG on threats to these precincts. *“I am aware of the wide range of environmental values, including remnant bushland, contained on the Perth Airport site and am concerned to see those areas with significant environmental areas protected. As advised in my letter of 15 April 2005, 312 ha of airport land is protected in conservation precincts. **The conservation precincts include 85% of the bushland assessed to be of the highest conservation value”***.

The new draft Master Plan 2020, paints an increasingly bleak picture for the future of any remaining biodiversity-rich bushland assets on the estate.

Addressing the Master Plan.

Foreword. *“This Master Plan 2020 outlines our next steps towards consolidation and ensures we address demand and growth, while striking a **balance** between economic development, environmental management and sustainability.”*

The above statement is a characteristically meaningless assurance. This *“balance”* has, in the past, been a distinct ‘imbalance’. Commercial imperatives have seen the increasing clearing of vegetation (including the Federally-listed Banksia Woodland of the Swan Coastal Plain TEC). Economic development will, it seems, always triumph over retention of the natural biodiversity on the estate. The following extract from the 2009 – 2014 Environmental Strategy Executive Summary, illustrates how meaningless are all such subsequent assurances and statements made by Perth Airport Pty. Ltd.

“A key initiative of this Strategy is to produce an ultimate development provision for environmental management at Perth Airport so at the expiration of the lease in 2096, the estate retains the key environmental attributes existing today.”

“During the preparation of the Preliminary Draft Master Plan, Perth Airport engaged with the Traditional Custodian representatives, including the Whadjuk Working Group, the South West Aboriginal Land and Sea Council and Aboriginal Partnership Agreement Group members”.

This consultation process carried out by Perth Airport appears to tick all the required boxes. There have also been instances where Perth Airport has gone further than required to address the concerns of the traditional custodians elsewhere on the estate. It remains to be seen, however, whether this current process will result in concerns over the future of Munday Swamp/Poison Gully, being satisfactorily addressed.

Executive Summary. Making best use of Perth Airport land. *“Planning for the use of the 2,105 hectare airport estate balances the safeguarding of long-term airfield, terminal and*

aviation support operations with the development of land. This incorporates the efficient use and development of non-aviation land.”

Whilst no doubt the above statement is correct and the Master Plan will ensure the stated outcome, this Master Plan, following the pattern established by its predecessor, confirms that “*efficient use and development of non-aviation land*”, means that every square metre of the estate must eventually produce a profitable income stream for shareholders, regardless of the damage caused to the biodiversity values of the estate.

Looking after the Environment and Heritage. “*Master Plan 2020 includes an Environmental Strategy and a Heritage Management and Engagement Plan which outlines the areas of environmental, sustainability and heritage focus in a five-year plan. The Environment and Heritage Strategy addresses factors which have been identified as having the potential to be impacted by airport development and operations, including biodiversity and land management, carbon and energy, air quality, ground-based noise and heritage locations. Specific heritage actions include further work with traditional custodians and engagement of Aboriginal businesses for land management works”.*

Neither the Strategy nor the Plan, offers any solace to those concerned with preserving the biodiversity values within the estate.

Conclusion. “*The Perth Airport Master Plan 2020 has been prepared to ensure that Perth Airport is planned and developed incrementally in an effective and efficient manner to support the growth of the state whilst delivering passengers a seamless and quality travel experience”.*

To have this bald statement in the Executive Summary, speaks volumes. The orderly development of Perth Airport, the growth of the State of Western Australia and the convenience and comfort of the travelling public, take precedence over ANY environmental concerns or values. The statement of intent (repeated below), now has an even more hollow ring. “***...at the expiration of the lease in 2096, the estate retains the key environmental attributes existing today.***”

Section 1: Introduction. 1.1 Perth Airport. “*The Perth Airport estate is 2,105 hectares in size and has sufficient land to support Western Australia’s demand for commercial aviation services for many decades. Land not required for aviation purposes can be used for industrial or commercial purposes”.*

Once again, a clear conflict between previous statements of intent and the current draft. Regardless of any following sections of the Master Plan devoted to environmental and cultural heritage values, the highlighted statement makes clear the fate of any natural biodiversity or cultural values within the estate. All will be lost to industry or commerce.

1.2 Ownership of Perth Airport. “*In July 1997 the ownership and management of Perth Airport was transferred from the Commonwealth of Australia to Westralia Airports Corporation under a 50-year lease with a 49-year option for extension. In 2011 Westralia Airports Corporation changed its trading name to Perth Airport Pty. Ltd. Perth Airport Pty. Ltd. is a wholly-owned subsidiary of Perth Airport Development Group (PADG).”*

This transaction perhaps, marked a turning point in the future of the biodiversity values of the airport estate. Despite initial steps, (outlined in Perth Airport’s AES 2009-2014) being taken

by the new ‘owners’ of the estate to ensure these values were preserved, it took less than 20 years for such initiatives to be rendered valueless. The incorporation of the Airport Environmental Strategy in the Perth Airport Master Plan 2014, clearly demonstrated the incompatibility of the ownership structure, with the retention of any significant biodiversity values on the estate. PADG, whilst using all the appropriate environmental language within its strategies, cannot afford to have any areas within the estate lying financially ‘fallow’.

1.3 Perth Airport Lease. *“An essential term of the lease is that the lessee must comply with all legislation relating to the airport site, including the Airports Act 1996 (Airports Act). Perth Airport’s substantial program of investment in aviation infrastructure is consistent with the company’s obligations under the lease to develop the airport, and in doing so, having regard to:*

- *the actual and anticipated growth in, and pattern of, traffic demand for the airport site,*
- *the quality standards reasonably expected of such an airport in Australia and*
- *good business practice.”*

Yet again, no evidence here, (nor in Section 9: Environmental Strategy), of the 2009 key initiative: *“...to produce an ultimate development vision for environmental management at Perth Airport so at the expiration of the lease in 2096, the estate retains the key environmental attributes existing today... Action and management plans are already in place to manage the conservation precincts as well as to manage key attributes such as soil, water and noise.”* (AES 2009-2014(Executive Summary, p. V).

Squandered too, is the Executive’s perceived opportunity to: *“... address current environmental issues and to demonstrate its leadership in environmental excellence”* and to strengthen *“many of its existing environmental action plans... ”*. (ibid.)

Section 2: Planning Context. 2.1 The Importance of Integrated Planning.

Whilst Integrated Planning is rightly considered a vital element to Perth Airport’s planning process and, statutory and legislative requirements are carried out thoroughly, this process has failed to arrest the exponential rate of clearance of natural areas within the estate. Neither State nor Commonwealth regulatory frameworks appear to be effective in protecting the rapidly-dwindling environmental values on the estate.

2.4.2. Environment Protection and Biodiversity Conservation Act 1999. *“It provides a legal framework to protect and manage nationally and internationally important flora and fauna, ecological communities and heritage places defined in the EPBC Act as matters of national environmental significance.”*

Perth Airport estate contained significant areas of now declared TEC, Banksia Woodlands of the Swan Coastal Plain. Much of the continuing loss of this valuable complex may be blamed on the following policy.

2.4.2.1 Environment Protection and Biodiversity Conservation Act 1999 Environmental Offset Policy.

The application of this convenient policy, created, no doubt, with the best of intentions, for the survival of biodiversity values, is a disaster for those values on the estate. Whilst it may be considered 'better than nothing' since, although areas of biodiversity value are being destroyed, other areas containing similar values, are being identified and managed. The end result will be the total destruction of ALL areas of biodiversity value on the estate. Under this policy, the Banksia Woodlands of the Swan Coastal Plain threatened ecological community (TEC), may disappear from the Perth Metropolitan area.

2.4.3 Aboriginal and Torres Strait Islander Heritage Protection Act 1984. This Act enables *"the Commonwealth to respond to requests to protect important indigenous areas and objects that are under threat, if it appears that State or Territory laws have not provided effective protection... There are no nationally protected heritage sites on Perth Airport."*

Since the airport estate is Commonwealth land, effective protection cannot be provided at the State level. The statement that *"There are no nationally protected heritage sites on Perth Airport"*, illustrates the irrelevance of the Act in this instance. The importance to the traditional custodians, of certain land within the estate, is widely recognised at State level and, by Perth Airport Pty. Ltd. Perth Airport has established a close working relationship with representatives of the Whadjuk custodians, part of the Noongar nation of people in the South West of Australia. In this instance, however, the Federal Government has 'responded' by denying the protection requested. An application under the Act, for the *"protection of significant traditional areas located within the proposed development footprint of the Perth Airport New Runway Project, Perth, Western Australia,"* has been rejected by the Minister.

2.5.1. Aboriginal Heritage Act 1972. *"The AH Act provides for the preservation, on behalf of the community, of places and objects customarily used by the original inhabitants of Australia or their descendants."*

Contained within the estate are the following places: Munday Swamp, Department of Aboriginal Affairs (DAA) Heritage Registered Site ID 3719 and, Munday Swamp Poison Gully, DAA Heritage Registered Site ID 3888, (encompassing Poison Gully Creek), Site ID 25023. In this instance the relevance of this act to the above areas, is also questionable.

2.5.7 State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region. *"SPP 2.8 identifies Bush Forever sites on the airport estate. This State policy does not directly relate to the activities on the estate and the Department of Planning Lands and Heritage (DPLH) has recently proposed to remove significant portions of Bush Forever from the estate."*

This alarming statement prompted questions to DPLH, regarding the extent of and reason for such a proposed action. The relevant sections of that response follow:

"The Western Australian Planning Commission (WAPC) has initiated the attached amendment to the Bush Forever boundary, generally within Perth Airport, which proposes to remove the designation of Bush Forever for approximately 226ha of already cleared areas (such as buildings, road and runways)... The recommendations of the WAPC are to be considered by the Minister in due course. Further, I note that the proposal to remove Bush Forever was only over areas that have been previously cleared through State and Federal approvals." The ineffectiveness of State and Commonwealth 'protection' measures has already been illustrated. The last section of the response illustrates the danger of permitting Bush Forever sites to degrade and demonstrates the irrelevance of the State legislation. The Airports Act 1996, exempts Perth Airport from the requirements of such legislation.

2.7.1 Perth Airport Development Objectives. *“Ensure the airport’s development and operations respect the strong bond that exists between the Noongar people and the land that comprises the Perth Airport estate.”*

Whilst the bond undoubtedly exists and efforts are made to maintain it, other, overwhelming commercial objectives, together with Commonwealth inaction, appear to be on course to considerably weaken that bond.

“Ensure the airport’s development and operations minimise adverse impact on surrounding communities and the environment.”

This is the only reference to the environment within the vision and objectives and clearly does not refer to the natural environment. It appears the fate of the environmental biodiversity values within the estate, is subordinate to more powerful objectives guiding Perth Airport’s development. Recent and planned future developments support this view.

2.7.2 Planning Approach. *“This Master Plan 2020 retains the fundamental concepts of all previously approved Master Plans...”*

This sweeping statement, though basically correct, is totally misleading. Before the incorporation of the Environment Strategy into the 2014 Master Plan, that Strategy had been a separate and powerful document, capable of ensuring the survival of sections of the estate containing the most valuable biodiversity values. Conservation Precincts were recognised as valuable resources, to be protected and husbanded. The watered-down strategy, once incorporated in the Master Plan, lost any effectiveness. Conservation Precincts were abolished, rehabilitation and revegetation work, carried out by dedicated environmental staff over many years, ceased and was wasted and, the loss of biodiversity values increased exponentially. *“Exceptional environmental management”* and *“the aspiration to retain the key existing environmental attributes through to the end of the lease period...”* (AES 2009 pp IV – VI). These objectives were now abandoned.

2.8.4 Environmental Management. *“This is achieved through integrated planning, developing solutions, management techniques... Perth Airport also participates in independent, third-party benchmarking and accreditation programs such as the Airport Carbon Accreditation initiative from the Airports Council International (Europe).”*

Whilst Perth Airport is to be commended on adopting such initiatives, none of them have succeeded in arresting the rapidly-increasing loss of biodiversity on the estate.

“Perth Airport incorporates sustainability principles into planning and development in several ways including:”

Yet again, none of these commendable principles has arrested the biodiversity losses on the estate.

2.10.1 Review of Master Plan 2014 Forecast. *“The forecasts presented in Master Plan 2014 were an overestimation of the passenger growth that actually occurred.”*

Is it reasonable to expect the new ‘assumptions’, used to justify development proposals in this draft Master Plan, to have any greater accuracy? If not, is a new runway really required?

Section 3. Land Use Planning. 3.1 Land Use Plan.

Despite having ‘*remnant bushland and wetlands*’ included in the 2105 hectare estate, the closest ‘objective’ for the preservation of biodiversity on that estate is to: “*encourage sustainable outcomes...*”. Whilst having sustainability as an objective is commendable, the context in which this loose term is used, gives no encouragement to those concerned over the continuing loss of biodiversity values on the estate.

“This Master Plan 2020 is consistent with the use of precincts and zones as previously detailed in the Master Plan 2014.”

This statement shows why the loss of biodiversity on the estate will continue. The 2014 Master Plan saw the effective removal of any protection for those areas of the estate considered to be of high environmental value. Valuable work carried out by airport environmental staff was undone, future planning for the preservation and conservation of Precincts 5 and 7 abandoned and, the stage set for the total destruction of these hitherto highly-valued assets. The failure of the leaseholders to honour earlier environmental undertakings is clear.

3.2 Precincts. *“The use of precincts in the Perth Airport Land Use Plan represents the high-level division of the airport estate for airport planning, development and identification.”*

“Precincts have differing objectives and characteristics...”

“The precincts and their respective primary purposes are identified in table 3.1...”

From that table, Airport North (absorbing much of the previous Conservation Precinct 7), is described as a: “*largely undeveloped vegetated area, except for the north-eastern corner containing industrial development.*” Its purpose? “*To develop an integrated mix of industrial, logistics and related commercial land uses that maximise the precinct’s strategic location and road and rail infrastructure.*” Contrast this with the “*Assigned land uses within Perth Airport Precincts*” shown in the **2009 Environment Strategy**, where the **only** uses permitted in Conservation Precinct 7 were ‘*Conservation areas*’ and, ‘*Recreational*’. Uses **not** permitted were: “*Commercial, aviation commercial, general warehouse, short-stay accommodation and industrial.*” Profitability is now the primary purpose apparently.

In **2005**, a Precinct 5 and 7 ‘**Rehabilitation Planning Report**’ was developed, “*with the intention of guiding revegetation activities on the Perth Airport estate.*”

In **2012**, Perth Airport established a **Conservation Management Plan**, containing the following key objectives:

- *To increase the resilience of floristic communities on the estate.*
- *Implement measures to protect fauna from environmentally threatening processes.*
- *Investigate the feasibility of introducing the Western Swamp Tortoise to wetland areas in Conservation Precinct 7.*
- *Undertake activities for the recovery of protected rare flora in accordance with Recovery Plans where available.*
- *Undertake measures to protect key flora species from environmentally threatening processes.*
- *Provide robust ecological linkages throughout the landscape whilst working towards the development of an ultimate Conservation Completion Plan.*
- *Maintain the essential ecological functions of wetlands.*

All this valuable work was wasted once the 2014 Master Plan was approved.

3.2.1 Airfield Precinct. *“Also occupying an area within the precinct is Munday Swamp, listed on the State Department of Planning Lands and Heritage’s register of Aboriginal Heritage Sites for its archaeological and ethnographic importance to the Noongar People. Munday Swamp totals approximately 20 hectares, approximately one hectare of which is open water. Munday Swamp supports diverse vegetation, invertebrate and vertebrate fauna, and is listed on the Commonwealth Directory of Important Wetlands.”*

This precinct, now including a significant area of the previous Conservation Precinct 7, will be discussed in **Section 4: Aviation Development.** together with the potential for damage to Munday Swamp and its surroundings.

3.2.3 Airport North precinct. *“The Airport North Precinct...will predominantly be developed for an integrated mix of industrial, commercial, aviation services and logistics land uses...an opportunity for a fuel storage facility and a major metropolitan intermodal facility ...”*

“Planning undertaken for this precinct proposes to retain certain areas containing high environmental and heritage values.”

In light of past failures to honour planning proposals, the retention of any of these areas is highly unlikely. The Commonwealth Environmental Offsets Policy will be invoked and, as was the case for Airport West, any areas of the Threatened Ecological Community (TEC), Banksia Woodlands of the Swan Coastal Plain and valuable tree cover, will be lost for ever. Neither the text nor the map support any other conclusion. The proposed new runway construction would see further losses of Airport North environmental values.

3.2.4 Airport West Precinct. *“Within the southern portion of the precinct, there is approximately 52 hectares of remnant bushland covering approximately 15 per cent of the Airport West Precinct. Of this, 8 hectares is the Commonwealth listed Banksia Woodlands of the Swan Coastal Plain threatened ecological community. The vegetation within this precinct ranges from completely degraded to very good. The precinct supports one State listed flora species”.*

To facilitate the construction of a Direct Factory Outlet (DFO) retail outlet centre and a Costco large format retail warehouse, several hectares of the above TEC were cleared, despite opposition from conservation groups, including NRPNG. The justification for the clearing was considered by some to lack logic and be completely at odds with an earlier objective. *“10% retention of a vegetation complex as a target for the preservation of its biodiversity value, with 15% retention as an aspirational goal.”* (2009 Environment Strategy p. 112).

3.2.5 Airport South Precinct. *“Contained within the central portion of the precinct is approximately 30 hectares of remnant bushland covering approximately 13 percent of Airport South. Nearly 2 hectares is the Commonwealth listed Banksia Woodlands of the Swan Coastal Plain threatened ecological community.”*

This, presumably is the section of ex-Conservation Precinct 5, an area in which much good work was carried out by environmental staff, prior to the 2014 Master Plan.

Section 4. Aviation Development. 4.1 Introduction. *“The Aviation Development Plan includes runways, taxiways, aircraft parking areas, navigation infrastructure and terminal*

facilities. The plan takes into consideration: ... the environmental and Aboriginal heritage values across the Perth Airport estate.”

To date, this ‘*consideration*’ has resulted in an increased rate of clearing of areas of Banksia Woodland, together with destruction of habitat, vital to the survival of endangered species and to the preservation of environmental values across the estate. A plea to protect areas of the estate having great cultural significance for the Whadjuk custodians, part of the Noongar nation, was rejected by the Federal Minister. The rejection indicates the Commonwealth’s total lack of respect for the views of the traditional custodians. Nothing will compensate for any ensuing damage to these areas.

4.5 Proposed Airfield Development Plan. 4.5.1 Runways. *“Like the previous 5 Master Plans, this Master Plan 2020 continues to contemplate future investments in additional infrastructure. These are:*

- *extending the cross runway (06/24) to the north-east to a total length of 3,000 metres,*
- *extending the main runway (03L/21R) to the north to a total length of 3,800 metres,*
- *constructing the new runway (03R/21L) to the east of Airport Central to a length of 3,000 metres.”*

These proposals, whenever deemed necessary, will require the clearing of yet more remnant vegetation. The loss of habitat and biodiversity will add to the environmental damage incurred to date.

4.5.1.3 New Runway (03R/21L)

Since the NRPG submission on the New Runway Project, (August 2018) dealt in detail with our environmental concerns and objections to the project, brief comments only will follow. The main concerns were the loss of yet more environmental values on the estate and the effect this will have on endangered species, the potential for significant damage to the area of Munday Swamp and, the ineffectiveness of State and Commonwealth legislation in protecting the biodiversity values on the estate. Given that the presence of cockatoos on the estate is said to be incompatible with airline passenger safety, how will Perth Airport tackle the problem of ducks in Munday Swamp, on the approach to proposed runway 21L?

Section 5. Non-Aviation Development Plan. 5.1 Introduction. *“The five-year non-aviation development plan supports the growth of land not required for aviation purposes and takes into consideration: [amongst other factors] environmental and Aboriginal heritage values.”*

Last in the list and, if past developments are any indication, lowest in priority, these values appear to be receiving little “*consideration*”. Any reference made to ‘environmental values’, ‘environmental impacts’, or ‘heritage values’ in this section, should be questioned or ignored.

5.3.1.1. Airport North Precinct Non-Aviation Development Plan. *“Planning is underway for the area south of Kalamunda Road, including a proposed road realignment. The preliminary Kalamunda Road design provides a new northern access point and will improve traffic flow and access to the precinct. Up to three access points off Kalamunda Road and into the Airport North Precinct will be required in the long term... The Midland Freight Rail line also bisects Airport North, allowing for a rail spur to be extended into the precinct... a future fuel storage facility may be developed in Airport North utilising a possible extension to the existing Midland Freight Rail line.”*

Doubtless, the realignment of Kalamunda Road will follow the route of Perth Airport's much earlier, illegal clearing of vegetation. The scar of this failed attempt to 'cut the corner' is still clearly visible. The Plan shows the most blatant disregard for all biodiversity values on the estate. Carried out in its entirety, it will see much of a biodiversity-rich environmental asset (protected earlier, within a Conservation Precinct), destroyed. It will become an industrial zone, purely in the pursuit of profit. How can Perth Airport, its Board and its Shareholders claim to have any objectives other than profit and commercial success? This Precinct Plan alone should cause them to hang their heads in shame, when they read the following words of their own dedicated environmental staff:

“In light of the unique surroundings associated with aeronautical functions and ongoing development, this management plan presents a sustainable approach for management of conservation areas within the Perth Airport estate. This approach, in conjunction with Federal Legislation ensures the ongoing viability of key environmental and cultural values at Perth Airport.” (Conservation Precinct Plan 2012).

And,

“Westralia Airports Corporation has adopted 10% retention of a vegetation complex as a target for the preservation of its biodiversity value, with 15% retention as an aspirational goal.” (2009 Environment Strategy p. 112).

Section 6 Ground Transport Plan. 6.5.1 Emerging Technologies.

It is encouraging to see the Plan considering the use of such technologies. This section, however, should include details of any plans for the provision of rapid-charging outlets for electric vehicles. Whilst reference is made elsewhere to this technology, for example **3.3.3 Airport Services Zone**, (tucked away under “*Discretionary Uses*”), the impression is that Perth Airport intends the provision of such facilities being left to lessees, such as retail fuel outlets. Perth Airport should be seen to be leading the way, instead, the plan shows Perth Airport, together with much of the State, lagging behind the rest of the world in this sector.

Section 7 Airport Safeguarding. 7.1 Introduction. *“The safety of air services arriving and departing Perth Airport daily and the capacity of Perth Airport to expand to meet aviation demand can be compromised by inappropriate land use and activities in the vicinity of the airport.”*

Retention of biodiversity-rich vegetation on the estate is obviously viewed as “*inappropriate land use*”, seen as compromising Perth Airport expansion. The construction of revenue-producing enterprises in situations exposing them to aviation hazards in the event of aircraft malfunctions, may also be considered “*inappropriate*”.

7.4 Airspace Protection. *“Protection of airspace for Perth Airport’s current and future needs is essential to provide a safe, predictable environment for the arrivals and departures of aircraft using Perth Airport in all weather conditions.”*

“Controlled activities...that could pose a hazard to navigation”

“an activity that results in air turbulence.”

Whilst this section refers to ground-based activities, the airborne consequences of having an approach path to the proposed new runway 2000 metres closer to the escarpment, may not have been fully investigated. Approaches to runway 21, in the presence of a sustained south-westerly wind (south of approximately 120 deg.), have always been acknowledged as hazardous, since aircraft may encounter rotor activity in the lee of the scarp. Whilst computer

simulation on the effects of moving approaches closer to the scarp may have been conducted, actual approaches on any future flight path should also be carried out.

7.5 Managing the Risk of Wildlife Strikes in the Vicinity of Perth Airport. “Perth Airport also manages vegetation and open waterways across the estate to minimise the attraction of species that may pose a risk to aircraft safety.”

In Perth Airport parlance, ‘managing’ vegetation has become a euphemism for ‘destroying’ vegetation. On the specious contention that Cockatoos are a significant threat to aircraft operations, Perth Airport has determined that remnant vegetation likely to attract bird species (or animal species attractive to birds), must be eradicated from the estate. In their eyes passenger safety and vegetation retention are mutually exclusive constructs. This Master Plan fails to explain, in detail, the ramifications of this ‘management’ process. The following extract, from the **2018 New Runway Project Master Development Plan (MDP)**, provides this information.

Section 12 – Fauna. At-risk. Conservation Significant Fauna.

Black Cockatoos.

*“Black cockatoo habitat is, by its nature, considered generally inconsistent with the safe operations of an airport. Bird strikes present a critical risk to aircraft and passenger safety, in addition to the risks to the surrounding community. **To that end, Perth Airport propose that the protection of avifauna habitat is best served through offsite environmental offsets and protection.**”*

The specious nature of this logic was challenged by NRPG in its 2018 submission, stating, inter alia: ‘The threats are known, the consequences acknowledged but, there appears absolutely no prospect of achieving any change in the attitude of Perth Airport. Cockatoo habitat, and other fauna-attracting habitat and the safety of the flying public are considered mutually exclusive. This is shockingly confirmed by the above statement.

Table 26-1, of bird strike incidents by significant species – May 2011 to August 2017 (Volume C Section 26, Hazards and Risks to Airport Operations), shows the Black Cockatoo equal **sixth**, with the Pacific Black Duck. Both were involved in 11 incidents each representing 5.4% of total incidents. On this basis it seems, the Black Cockatoo-attracting habitat vegetation must be destroyed if the flying public is to remain safe.’

Section 8 Services. 8.2 Stormwater Drainage. A description of wetlands on the estate in the Environment Strategy 2009, states:

“The main wetlands on the estate ... include:

- *Munday Swamp;*
- *Northern Wetland;*
- *Runway Swamp; and*
- *Precinct 5 Constructed Wetland.*

Runway Swamp and Munday Swamp are listed on the Directory of Important Wetlands.”

Given the significance of these airport wetland areas, this and following stormwater drainage sub-sections are important, since any development activity on the estate will affect their long-term integrity and effectiveness.

8.2.2.1 Northern Main Drain (NMD). *“It drains three open channels that cross the eastern boundary: Poison Gully, which has its source near the top of the Darling Scarp, and two Water Corporation scheme drains. [These] drain directly into Munday Swamp. During times of high flow, the NMD on the airport reaches capacity and overflows into the southern end of Munday Swamp. When Munday Swamp reaches its capacity, it overflows at its northern end and overflows into the nearby NMD.”*

This description emphasises the importance of the NMD to the health of Munday Swamp and the need for care, if and when works are carried out for the New Runway Project. The cultural significance of Munday Swamp and Poison Gully Creek to the traditional custodians, will need to be sensitively handled. The Major Development Plan for Airport North, expected shortly, will only compound any problems encountered.

8.2.2.2 Southern Main Drain (SMD). *“The SMD is an open unlined channel for most of its length through the estate. It drains Crumpet Creek, which has its source near the top of the Darling Scarp.”*

A considerable amount of work has been carried out on this drain under the Living Streams programme, linked to the Gateway WA project. Much of this drain is being netted as part of the \$1.7 project to net more than three kilometres of previously uncovered open drains. The question of how the open waters of Munday Swamp will be handled, remains unanswered.

8.9 Sustainability.

Perth Airport is to be complimented on its efforts in this area. Environmental staff, impotent to prevent most biodiversity losses on the estate, are doing very worthwhile work in the area of ‘real’ sustainability, work which looks set to continue.

Section 9 Environmental Strategy. 9.1 Introduction. *“Perth Airport continually reviews its environmental processes, seeking to minimise environmental impacts from airport operations and improve sustainability outcomes.”*

These reviews, aimed at minimising environmental impacts, have completely failed to arrest the loss of biodiversity values on the estate. Comforting statements in the 2009 AES, giving hope for such minimisation, have been erased in the subsequent Master Plans.

9.3.4 Environmental Management System. *“Through this process, Perth Airport identifies environmental risks, opportunities and constraints...a wide range of monitoring and reporting processes are in place to satisfy Commonwealth and State regulatory requirements...”*

This ‘System’, whilst satisfying the requirements, fails to arrest the loss of biodiversity values. Values (e.g. **9.4 “Environmentally Significant Areas”**) are identified, monitored and then destroyed. In most cases the ubiquitous Environmental Offsets Policy is invoked.

9.8 Biodiversity Management. 9.8.1 Objective. *“Maintain and protect listed environmental values onsite or, where agreed with regulatory authorities, provide offsite offsets for listed environmental values as appropriate.”*

This should be rewritten. Maintenance and protection of “*environmental values onsite*” seldom if ever takes place. Translocation of species onsite may be the sole exception.

9.8.6 Five Year Action Program. *“Initiatives to be undertaken between 2020 and 2024, as part of Perth Airport’s five-year action program for biodiversity management are:”*

The first initiative certainly has merit: *“Develop and implement a Biodiversity Management Plan including weed, pest and dieback.”* At least much of the good work carried out earlier by the Environmental staff, will be continued, in those few areas of environmental value remaining. The benefits of effective control of weeds, pests and dieback on the estate, will undoubtedly aid surrounding local government areas in their own battles.

The second initiative: *“Develop and implement a Conservation Significant Flora and Vegetation Management Plan.”* has less credibility. Since very little of the once prolific significant flora and vegetation remains, the Management Plan will have less and less validity, as the volume of flora and vegetation continues to dwindle. As an initiative, this appears nothing more than an empty, ‘window dressing’ statement.

Section 10 Consultation. 10.2 Stakeholder consultation. Perth Airport Consultative Environment and Sustainability Group (ACES). *“The group discusses topics related to the environmental management of the estate.”*

NRPG has been represented on ACES for some time and regrets that its presence has been unable to influence environmental outcomes. Meetings provide a forum for staff, tenants, local government representatives and community groups to discuss a variety of topics on environmental matters. Environmental staff at meetings are more than willing to answer questions, provide more information and to note comments. Membership of this group convinces NRPG that environmental staff, finding themselves powerless to protect most of the biodiversity values on the estate, are now directing their efforts towards other areas of sustainability, areas in which they continue to do good work.

10.3 Master Plan 2020 Consultation.

As with the Perth Airport New Runway Project, the consultation process has been thorough. Ample time has been allowed for submissions to be prepared, community briefings have been carried out and, once again, the Airport’s Experience Centre has been made available at certain times, with questions willingly answered by staff. Will any submissions have an effect on the final Plan? Past experience suggests nothing will change in the relevant environmental sections of the plan. For Perth Airport and the PADG it will be ‘business as usual.’

Submission Conclusion.

Whilst the method chosen to address this draft produced a lengthy submission, it provided an opportunity to examine the shocking post-2014 environmental record of Perth Airport. This Master Plan confirms that under its stewardship, destruction of biodiversity values on the estate will continue at an increasing rate. When development proposals face environmental hurdles, Perth Airport will naturally continue to make use of the Commonwealth Environmental Offsets Policy and its Guidelines.

Earlier documents reveal Perth Airport’s unwillingness to adhere to its own stated objectives. It blatantly and conveniently ignores earlier undertakings made, it casts aside the valuable work carried out by environmental staff over many years and, its main concern appears to be commercial gain. These are signs that submissions such as this, will carry little weight. Nevertheless, they must be made, in an attempt to change the thinking of Perth Airport Pty. Ltd. and its ‘parent entity’, Perth Airport Development Group Pty. Ltd.

Important references in this submission are deliberately repeated. Through this draft Plan, despite assurances to the contrary, the estate's environmental values continue to face destruction. Highlighting the broken promises and lost opportunities revealed by these earlier documents is essential, since Perth Airport and PADG appear to be showing all the signs of environmental amnesia.

Responsibility for this shocking situation must be shared by the Commonwealth Ministers, who have done little to protect the environmental values of the estate. They appear to have lost sight of the importance of the now defunct Conservation Precincts. That importance was recognised by the Howard Government's Minister for the Environment, Ian Campbell, who was:

“concerned to see those areas with significant environmental areas protected”, acknowledging that ***“The conservation precincts include 85% of the bushland assessed to be of the highest conservation value”***.

Passengers flying into the airport at that time (2005) would have seen hectares of natural vegetation on the airport estate. Perth was then the only capital city airport with such a valuable and biodiverse environmental asset. Even now, despite significant vegetation losses, there is sufficient remnant vegetation cover to please the eye of arriving passengers. Once this Master Plan, together with its five-year objectives, is implemented, arriving passengers will alight at an airfield estate stripped of vegetation, covered with a mess of structures and barren sealed surfaces. Perth Airport will be just like every other capital city airport in the nation.

“Perth Airport is the gateway to Western Australia for business people, tourists students and new migrants from interstate and overseas....Through Perth Airport, they access our beautiful capital city and across this great State, our natural wonders;”

(Perth Airport Annual Report 2017, Chairman's Message).

First impressions are important. As *“the gateway to Western Australia”*, is this continuing drive to strip the airport estate of its last vestiges of natural vegetation such a good idea? There is an increasing public awareness and acknowledgement of the value of natural areas to the physical and mental wellbeing of the population. Prior to the 2014 Master Plan it appeared Perth Airport had recognised this and planned to act, to retain such biodiversity-rich areas of the estate. Unfortunately, under this draft Master Plan, Perth Airport is on track to return us to the 'Wetlands to Wastelands' scenario of 2004.