



14 October 2019

Draft Master Plan 2020
Perth Airport Pty Ltd
PO Box 6
CLOVERDALE WA 6985

Dear Sir/Madam

Submission: Perth Airport Preliminary Draft Master Plan 2020

The following is a submission regarding the **Perth Airport Preliminary Draft Master Plan 2020 (PDMP)** on behalf of the Urban Bushland Council WA Inc.

The Urban Bushland Council (UBC) is the peak community organisation advocating recognition, protection and appropriate environmental management of urban bushland – primarily bushland found within the Perth Metropolitan Area. The UBC has about 75 community conservation groups as members and they are all committed to the conservation and appropriate environmental management of bushland remaining in urbanised parts of the state. The UBC holds seminars; produces newsletters, brochures, posters and proceedings; meets with politicians and bureaucrats; discusses bushland management issues; prepares comments and submissions on planning proposals; and engages in educational and promotional activities designed to develop and enhance community appreciation of the natural world as experienced and observed in urban bushland.

The UBC has had a strong interest in the natural areas remaining in and around Perth Airport since the Council's formation in the early 1990's. The UBC has taken this interest because of the extensiveness, the range of habitats and biodiversity of these bushland areas and their importance in the context of the urbanised parts of the Swan Coastal Plain – and in the context of the Coastal Plain generally. Notably it was recognised by State Government scientists in the 1990's that Perth Airport bushland is one of the 3 most important sites for native fauna conservation in the region, the others being Jandakot Airport and Whiteman Park (John Dell, Ric How pers.comm.). Sadly most of Perth Airport and Jandakot Airport bushland has since been destroyed largely for non-aviation purposes due to failure of the Commonwealth to legally ensure protection of these areas.

This being the case, it should come as no surprise to Perth Airport Pty Ltd that the Urban Bushland Council is thoroughly dissatisfied with the contents of the **Perth Airport Preliminary Draft Master Plan 2020**. Specifically, the UBC is thoroughly ***dissatisfied with the absence from the document of any commitment to retain any substantial areas of native vegetation and habitat with the possible exception of some of the vegetation in and immediately adjacent to Munday Swamp.*** The absence of any commitment to retain native vegetation and habitat from the **PDMP 2020** carries on the theme of the **2014 Perth Airport Master Plan**, which, for the first time since Perth Airport's privatisation, simply dismissed and discounted the natural areas at Perth Airport not required specifically for aviation as being nothing more than areas earmarked for development. Development designed to generate revenue for Perth Airport Pty Ltd.

That this represented a massive departure from the approach to the natural environment of the approved Perth Airport Master Plans for 1999, 2004 and 2009, was not even acknowledged in the document but it was never likely to escape the notice of those with a genuine interest in the protection of our natural heritage – and it hasn't. Shifts of this nature, which have such calamitous implications for the environment, could not occur without political consent and the fact that one of the most environmentally

unsympathetic governments the nation has ever seen was in control in Canberra during the preparation and approval of the **Perth Airport Master Plan 2014**, accompanied by a State Government of similar ilk, no doubt paved Perth Airport's road to real estate riches at the expense of the airport's natural environment. But community groups such as ours don't have to approve of the long term environmental and heritage interests of Australians being trashed for the benefit of corporations - and we don't. However Perth Airport Pty Ltd want to try to spin this situation, there has been a major degeneration and decline in the environmental expectations placed on the corporation by the Commonwealth with respect protection of Perth Airport's natural areas since the airport was privatised. One simply needs to study the successive **Perth Airport Master Plan** documents approved since privatisation to see the obvious about-turn in 2014. The combination of an environmentally unsympathetic Commonwealth Government and a period noted for its public disengagement in political matters generally, has provided an opportunity for Perth Airport Pty Ltd to abandon its commitments to protect substantial areas at the airport in favour of revenue-raising development. It is not a state of affairs we find acceptable.

The land at issue is Commonwealth land; that is, land owned by the general public, and as such it should be used for the service of the longer term public good – not simply for a corporation to exploit for its own good. Claims of benevolent motivations such as job creation, regional prosperity and the nurturing of the state are nothing more than any corporation might profess and they should be seen in the same light. The Swan Coastal Plain is an exceptional ecosystem facing many threats. ***Perth Airport has substantial representations of its flora, fauna and habitat in an otherwise ecologically depleted region, and as such, as much as possible of its natural habitat should be protected in situ.***

The dramatic change in land used planning evident in the approved **Perth Airport Master Plan 2014** as compared to the approved **Perth Airport Master Plans** of 1999, 2005 and 2009 is something for which the Urban Bushland Council sees no suitable explanation, both in terms of the radical shift on the part of the leaseholder and in terms of what the Commonwealth was prepared to accept. How a corporation like Perth Airport Pty Ltd, formerly known as Westralia Airports Corporation, could simply abandon a commitment to protect over 300 hectares of airport land for conservation purposes in designated Conservation Precincts which had been in place for 15 years, and which it had highlighted in Environmental Reports and Environment Strategies over that period, and which it had claimed to have devoted considerable resources to managing, and about which it had invited community members to attend numerous time-consuming and inconveniently-scheduled consultative meetings, constitutes a reversal that raises many serious questions about the responsibilities of airport leaseholders and their oversight by the Commonwealth.

The initial **Perth Airport Master Plan 1999** produced after privatisation represents the best reflection of the disposition held by the Commonwealth and the community at the time the lease for the airport was being sold. Back in the mid to late 1990's the Urban Bushland Council's representatives and other interested parties spoke to senior government figures, senior bureaucrats and even representatives of prospective Perth airport leaseholders regarding the prospective leaseholder's environmental responsibilities and it was in that climate that the sale and purchase were undertaken. If the prospective leaseholders had been given to understand they would have open slather to develop every parcel of land on the airport, then it is our very strong view a very different price for the lease would - and should - have been negotiated. But to the best of our knowledge, and if the responsible politicians and senior officials from the Department of Finance could be taken at their word, ***there was no assurance that prospective leaseholders would get environmental clearances to clear land with high conservation values at the airport and there was, indeed, an expectation that the best of that land would be protected if it was not required for aviation purposes. This was clearly the understanding of the successful leaseholder at the time of the production of the initial Perth Airport Master Plan 1999 and it is reflected very clearly in the document. Our representatives occasionally met with senior Perth Airport staff and their verbal assurances were completely consistent with this view.***

The curious and very disturbing truth about the loosening of environmental expectations of Perth Airport Pty Ltd on the part of the Commonwealth is that it has occurred during a period of general environmental decline within the biogeographic region in which it lies. The Urban Bushland Council, through its member groups, and its interest in the subject generally, is very well placed to appreciate how serious a risk the many **“threatening processes”** confronting the flora and fauna of the Swan Coastal Plain pose to the ongoing ecological viability of the region. Bushland clearing on the Swan Coastal Plain has not ceased since Perth Airport was privatised, the climate is still becoming hotter and drier, *Phytophthora* spp. (Dieback) diseases are still marching through the region wreaking havoc on plant communities and trees, too-frequent fires continue to permanently damage bushland remnants, and intractable exotic weeds keep crowding out and out-competing native species. But despite this context of deteriorating environmental conditions and outcomes in the region, Perth Airport has been allowed to clear large areas of native vegetation and habitat for nothing other than commercial gain. And this clearing agenda is facilitated by the preparation and approval of planning documents – such as the **Perth Airport Master Plan 2014** – that the UBC regards as being completely environmentally unacceptable.

The UBC raised many objections to the 2014 Preliminary Draft Perth Airport Master Plan’s removal of the airport’s Conservation Precincts and has raised the issue many times subsequently in submissions and correspondence. We attempted to get media coverage of the issue but in an era where much of the corporate media in Australia has given up on reporting facts and is actually committed to muddying the waters on such issues as global warming, informing the public with respect to serious environmental issues is no easy task. The fact that there has been no positive response to the objections we have raised with politicians and government officials says more about the willingness of the Commonwealth to put ***corporate interest ahead of the long-term public interest*** than it does about the validity of the objections. In this somewhat bleak context, it is extremely disappointing, but in some ways not surprising, that there has been no improvement evident in the drafting of the **Preliminary Draft Perth Airport Master Plan 2020**. ***It makes no commitments to protect native vegetation that we can identify*** and it is a thoroughly self-serving document despite its many claims to represent the best interests of Western Australians.

It is with wry amusement that we note frequent references to broad-brush WA Planning Documents nominating Perth Airport as an **“Activity Centre,”** (e.g. p. 43), as if it placed some kind of obligation on the leaseholder to carry out extensive land development at Perth Airport. Of course, this onerous responsibility conveniently coincides with Perth Airport’s determination to derive real estate revenue from every piece of airport land for which it can obtain a development approval. Our representatives have been dealing with Perth Airport management (including the old FAC) for long enough to recall the contemptuous and dismissive attitude that has long characterised its approach to state initiatives and policies that did not suit its own agenda. We could cite the warm embrace it gave to the WA Government’s System 6 Report (1983) (Recommendations for Conservation Reserves in the Darling System) (Perth Airport Site M52) and the Bush Forever initiative (2000) (Perth Airport Bushland Site 386) We note that the **PDMP** claims “the Department of Planning, Lands and Heritage (DPLH) has recently proposed to remove significant portions of Bush Forever from the estate” (p.42). Perth Airport has never demonstrated any interest in Bush Forever, and has consistently claimed it has no relevance or legal force with respect to the Commonwealth land upon which Perth airport lies. However, the Urban Bushland Council sees no justification for Bush Forever Areas being removed from the airport estate and is of the very strong view that Perth Airport should have demonstrated a commitment to conserving as much of the Bush Forever native vegetation and habitat as possible on site. Bush Forever was put together to recommend reserves in a particular biogeographic context and it would be nonsensical to omit one of the larger bushland remnant areas lying in the urbanised parts of Perth on the Swan Coastal Plain.

The Urban Bushland Council has long objected to the clearing of native vegetation at Perth Airport and can only make the point that, if environmental provisions in the Airports Act 1996 and its attendant Regulations, and the Environment Protection and Biodiversity Conservation Act 1999 and its attendant

Regulations, have been complied with satisfactorily with respect to this clearing, then we can only assume there is something seriously wrong with the legislative and regulatory framework governing these matters, or there is something wrong with the way they are applied, administered or enforced. We make this assumption because the environmental outcomes have been so demonstrably bad. And what it is worse, we are expected to look forward to a lot more of the same. If very large areas of native vegetation and habitat have been removed at Perth Airport – much of it for non-aviation-related purposes – then unless it has been recreated at some nearby site we are not going to be convinced this is anything other than a major environmental loss to the region. The use of so-called environmental offsets to compensate for the clearing of native vegetation and habitat deemed to be “significant” under Commonwealth legislation for non-essential developments in the Perth region may be an acceptable practice to corporations and governments but it certainly is not to the community conservation movement. The disconnection is that one side of the argument is actually concerned about protecting Australia’s natural heritage. ***The outcome is a net loss of high conservation value bushland.***

The legislative framework that purportedly controls development at the airports with respect to their environmental impacts is something the UBC finds exceedingly frustrating precisely because the on-ground outcomes are so obviously ruinous. It does not matter how many studies and surveys a proponent is required to prepare, or how many forms they have to fill out, or how many processes they have to go through, if the outcomes are unacceptable then the system is unacceptable. Our members see the bushland disappearing – and with it the populations of uncommon plant species, we see the declining native birds species and reptiles being displaced or killed by clearing, we see the wetlands being destroyed and we do not see how all this can be dressed up as progress of civilisation or as something that would occur within an acceptable environmental protection regime.

The Urban Bushland Council is not satisfied that all of the native vegetation and habitat remaining at Perth Airport is accorded the environmental value and significance it really warrants. ***It is the very strong view of the UBC that virtually all of the native vegetation and habitat remaining on the Swan Coastal Plain should be deemed to be “significant” under the EPBC Act 1999.*** In the Perth Airport context, “significant” vegetation primarily refers to listed species and ecological communities. In the UBC’s view, the word “significant” is wholly abused in environmental processes in operation at Perth Airport as it is used to discount the value of large areas of native vegetation and habitat that do not meet the narrow criteria that the Commonwealth is content to see applied in order to use this designation. It has long been a matter of great frustration to the UBC that the EPBC Act does not seem to be applied other than for matters of “national environmental significance” at Perth Airport, when in fact it should be administered recognizing that it is **Commonwealth land** and therefore immune to state’s environmental protection laws. There is no reason why Perth Airport should enjoy a more lax environmental protection regime than applies at the state level. If a land holder or land manager wishes to clear native vegetation in WA then they need to seek a Permit and that Permit process is publicised and open to public comment under the WA Environmental Protection Act 1986. But we find out about clearing operations at Perth Airport involving high conservation value Bush Forever sites when the bulldozers are at work – and sometimes only after they have finished their work. This is an outrageous situation and this “privileged” status for Perth Airport is not justified. This status as an oasis from regulation can be illustrated by a quote from a recent edition of *The West Australian*, under the headings “Ready for Take-off” and “Airport home found for WA biome project,” regarding a proponent wanting to carry out a major development at Perth Airport:

“..Previously slated for land in front of Crown Towers in Burswood, the Australian Biome Project is now proposed for the Airport West precinct with Perth Airport today signing a memorandum of understanding that will ring-fence a 15ha site near Costco, DFO and the Airport Observation Deck.....

The Biomes which are inspired by the Eden Project in Cornwall, England and Singapore’s Gardens by the Bay, are expected to cost \$510 million, project spokesman Adam Barnard

said. “We didn’t want to see this project held up unnecessarily because of bureaucracy and red tape, which has stifled WA for too long,” he said.

“So by building on this site, which is technically crown land, we are significantly reducing any potential barriers that may have come from using State land.” (p.14, Oct. 15, 2019)

The DFO and Costco developments referred to in this extract from *The West Australian*, have both occurred in recent years and both involved the clearing of Banksia Woodlands of the Swan Coastal Plain Threatened Ecological Community. The DFO site involved the clearing of a ***superb remnant of Banksia woodland that airport documents conceded was largely in excellent condition***. This development could have occurred at many other sites in Perth or even elsewhere at Perth Airport without the need to clear this vegetation but the Commonwealth happily approved the destruction of this irreplaceable native remnant and it is now been replaced by shops and a very large carpark.

So it is the very strong view of the Urban Bushland Council that it shouldn’t take “one of the nine matters of national significance” to trigger a formal environmental assessment process for clearing works at Perth Airport – the fact that it is **Commonwealth land** should also be taken into account. **That is what the EPBC Act clearly indicates**. Our representatives have put this view before but for some reason only the “nine matters of national significance” trigger appears to be considered by both the leaseholder and by the Commonwealth.

It is the very strong impression of the Urban Bushland Council that Perth Airport routinely seeks to employ environmental offsets as a first resort when proposing to clear high conservation value native vegetation and habitat for development works. The PDMP makes the following claim:

Consistent with the Commonwealth’s EPCB Act Environmental Offsets Policy (2012), Perth Airport will consider avoidance, minimisation and mitigation measures prior to considering offset measures (p. 208).

So the **PDMP** claims Perth Airport considers avoidance but where is the evidence? Avoidance means not clearing any MNES.

It is our understanding that environmental offsets are supposed to be a last resort and only for essential works where there is no practical alternative. The Urban Bushland Council has expressed its vehement opposition to the routine employment of environmental offsets for the purpose of obtaining clearing approvals in any number of meetings, submissions and letters since their inception but the Commonwealth is not interested and not listening. The community conservation movement was never likely to be so ignorant and so bereft of cognitive powers as to fail to grasp what a deceptive, destructive and environmentally corrosive practice it is and was always likely to be. The concept is essentially ridiculous and indeed nonsense in the case of native vegetation and habitat that is already under significant threat and that is essentially impossible to recreate. The only option that has the slightest appearance of being viable is to change the tenure of some piece of native vegetation and habitat that already exists but is not formally protected. But the question is why that secondary site is not already protected if it is under threat? **And is there not a net loss of native vegetation and habitat even if the secondary site is protected?** And if the claim is that putting an alternative site into a reserve system will miraculously protect it by virtue of intensive management, perhaps it might be more honest to admit there are nowhere near enough resources made available to manage existing reserves to anything like an optimal level under virtually any administration one would care to name.

The option of “avoidance” only appears to be considered in the case of individual proposals at Perth Airport such that a particular development could be said to be unable to proceed unless native vegetation and habitat in its footprint were to be removed – thus making “avoidance” seem an impossible option. But the reality is that Perth Airport is a major developer and is perfectly able to “avoid” native vegetation and

habitat in its planning processes. It simply chooses not to. The Urban Bushland Council regards the EPBC Act 1999 Environmental Offsets Policy as nothing more than a blight on natural heritage protection in Australia. For Perth Airport it essentially renders Environmental Protection legislation useless in practical terms – it does not protect the environment and it creates a legal justification for development that does not have a moral justification. Native vegetation and habitat does not have to be protected in situ or even within a hundred kilometres under the Environmental Offsets Policy and thus it is a completely bogus environmental solution. The PDMP describes the Environmental Offsets Policy thus:

The policy recognises that there are different ways to achieve good environmental outcomes and seeks to improve flexibility in delivering these. The policy aims to improve environmental outcomes through the consistent application of best offset principles, providing more transparency, and encouraging advanced planning of offsets (p. 40).

The “*different ways to achieve good environmental outcomes*” refers to the miracle of **destroying high conservation native vegetation and habitat in very large swathes and having this constitute “a good environmental outcome.” This is nonsense and is totally unacceptable.**

There is no particular reason why non-aviation development projects have to occur to Perth Airport – it would be strange indeed if the WA economy was dependent on Perth Airport finding paying tenants and despite the tenor of the **PDMP** it most certainly is not. Accordingly, the UBC is particularly unimpressed by the following paragraph which appears in Section 2: Planning Context:

In recognition of the critical role played by Perth Airport in the economic development and employment framework for Perth and Western Australia, the Master Plan 2020 incorporates application of the Environmental Offsets Policy to enable suitable offsets to be determined and applied (both onsite and offsite), recognizing the strategic use of the land within the airport estate to support the growing demand for airport services (p. 40).

So Perth Airport modestly recognises its own “critical role” in the economic development of Western Australia and uses this to justify clearing native vegetation and habitat that is unique to the region and facing multiple serious threatening processes even without bulldozers smashing through it. The UBC has seen a vast number of development proposals put forward for sites around Perth over the years and it is remarkable how many of them have been promoted as “essential to the economic development of the state.” The **PDMP** states, under the heading “Perth Airport Development Objectives”:

The objectives that guide Perth Airport’s development are:
- bring land not required for long-term aviation service into productive use to support economic development and create employment in Western Australia (p.49)

The UBC objects to this attempted justification for clearing high conservation value bushland and MNES. Respect for, and protection of MNES must come first.

The **PDMP** makes unfounded claims about Perth Airport’s commitment to protection of the environment throughout the text and the lack of substance to the claims is illustrated by the reliance on the repetitious use of effectively meaningless catchwords like “*sustainability*” and “*strategies*” and “*plans*” and “*monitoring*” and “*reviews*” and “*opportunities*” but no actual commitment to conserving native vegetation and habit in situ. The PDMP makes the following claims with regard to environmental management:

Environmental management and sustainability at Perth Airport are guided by a vision to operate and grow in a manner that minimises environmental impacts and considers sustainable solutions for the development and operation of the Airport Estate.....

Perth Airport incorporates sustainability principles into planning and development in several ways, including:
- the integration of environment and sustainability into planning processes to enable early identification of opportunities and constraints,

- the consideration of building management, vegetation retention, and resource conservation opportunities during the planning and design phases of development'
- ongoing review and assessment of compliance of environmental outcomes.....(p.54).

Our observation of airport developments undertaken over many years has revealed a very strong, perhaps even exclusive, preference for the total removal of native vegetation prior to construction and we do not see the slightest indication in the **PDMP** of any firm commitment to retain any native vegetation and habitat. We do not regard the planting of native seedlings along drainage lines as retaining native vegetation. It is rehabilitation work of sorts and better than nothing but **it is no substitute for retaining native vegetation and habitat in situ**. Of course there were firm commitments to retain very large areas of the same in the first three **Perth Airport Master Plans** approved after privatisation, and plenty of verbal assurances from airport management regarding those reserved areas, but those firm commitments did not turn out to be very firm at all. Conservation Precincts that only last for 15 years before being bulldozed are highly unusual – perhaps even unique to Perth Airport – but as it takes tens of millions of years for the natural landscapes to form and the life forms it supports to evolve, they cannot be said to be ideal. If their initial inclusion in the **Perth Master Plan 1999** was a mistake, why was it repeated in the two subsequent **Perth Airport Master Plans** (2004 and 2009)?

What we do know is that it only takes a relatively small window of opportunity for the Perth Airport to destroy the existing native vegetation and habitat that was included in those Conservation Precincts – and the large areas of native vegetation and habitat that were not - and can never be - put back. The crudest technology can be employed to carry out this work, it requires almost no intelligence and it involves the destruction of beautiful flora and fauna that is unique to the region and in serious decline. This is the real story of Perth Airport's environmental management and no amount of spin in a **PDMP** document is going to convince the community conservation movement otherwise.

It is interesting that the previous **Perth Airport Master Plan 2014** significantly overestimated passenger growth forecasts (p. 57). The Western Australian economy is quite an unpredictable entity and it could be said to be structurally unstable. It is greatly dependent on commodity prices and new mining development and that vulnerability is not likely to change in the foreseeable future. And it is a fundamental flaw in Western Australian planning documents like the *State Planning Strategy 2050* that they steadfastly refuse to acknowledge the state suffers a cyclical boom and bust economy unless, by some as yet unknown means, the economy diversifies sufficiently to insulate it from international commodity price volatility.

The documents are intended to create an optimistic vision, they are released by governments and it is politically unpalatable to acknowledge intractable problems so they have to be taken with more than a grain of salt. The term "green shoots" has been used so frequently and so inaccurately for years with respect to the anticipated upturn in the WA economy that it has become something of a joke. Mining and agriculture are major revenue sources but **not large employers when mines are mature and automation is almost certain to reduce employment these areas in the coming years**. In this context, the UBC is not convinced and indeed questions that Perth Airport needs a new runway. Where is the business case for a new runway?

If air traffic were to increase above the capacity supplied by the current 2 runways, the UBC would favour the relocation or extension of facilities of Perth Airport to a site east of the Darling Scarp. **The construction of the proposed new runway would result in the destruction and degradation of very large areas of high conservation value native bushland and habitat, including Munday Swamp which is a very significant Aboriginal heritage site which must be recognised and protected**. In addition, it is our understanding **the proposed new runway could present safety risks in terms of wind shear issues**, being in close proximity to the Darling Scarp. The **proposed new runway would also bring serious aircraft noise problems** to a whole new population of Perth citizens and not necessarily alleviate many problems for those already experiencing the inconvenience.

The **PDMP** stresses Perth Airport should operate as a 24 hour airport (p. 27) but it is a reasonable question to ask why Eastern states citizens are given relief from aircraft noise by means of curfews but Perth citizens are not. If it is the case that Perth Airport would be a much more unviable operation if curfews were introduced, then that is another good argument for its relocation.

The **PDMP** puts some emphasis on the consultation with state and local governments Perth Airport has undertaken with regard to its development proposals:

The non-aviation development plans in particular have been guided by extensive engagement with State and Local Government. In preparing this Master Plan 2020, Perth Airport conducted workshops with key stakeholders to ensure planning for non-aviation development remains to, and representative of, the aspirations of the surrounding areas (p. 111).

“Representative” is not the foremost quality we would attribute to Local Government in WA. It is well-known community participation in Local Government elections is poor. About a third of eligible electors vote and that turnout would be a lot worse in many electorates. Furthermore, it is often the case that even the electors who do vote know very little about the candidates or what they stand for but feel they should vote as a matter of principle. And they often receive very little information to what the successful candidates actually do on council once they have been elected. The UBC has had quite a bit to do with Local Government. Suffice to say any claim it represents “the will of the people” is one we would regard with some scepticism.

As for State Government representatives, we can only say Perth would have to be one of the worst-planned cities in Australia – having an enormous extent of sprawl relative to its population and managing to have big-city traffic problems in a modestly-sized city in terms of population. The UBC has not liked the look of planning documents released by the State planning authorities in recent years and it is thoroughly dissatisfied with the successive State Governments’ **failure to implement Bush Forever and to take other necessary actions for the protection of our natural environment. It is the UBC’s strong view, and it is indeed our experience, that the majority of the community want our natural environment and our flora and fauna adequately protected.** But most citizens lack either the detailed knowledge or the spare time to monitor what governments (conventionally being more committed to public relations than substance) are doing on their behalf.

Whereas the **Environment Strategy** was a separate document containing some considerable detail in the 1999, 2004 and 2009 **Perth Airport Master Plan** documents, since the **Perth Airport Master Plan 2014** it has become a tack-on at the back of the **Master Plan** documents and it certainly has a lot less to offer the environment. It is heavy on catchwords and jargon, but referring to this or that “framework” or a “policy” or a “strategy” or a “system” or “sustainability” does not substitute for a solid guarantee that very substantial areas of native vegetation and habitat will be set aside for conservation. **Without this the Environment Strategy is unacceptable and unsupported.**

“Figure 9-8 Vegetation Community Types” (p. 218) in the **Environment Strategy** is a curious inclusion as the vegetation types are not even named – merely given numbers. This is not a satisfactory rendering of information and it should not appear without a proper key. It is also unsatisfactory to find Priority flora species at the Airport are not specifically named (p.224). It is also our view that **a full flora and fauna list for Perth Airport should be included in the Environment Strategy**, even allowing for the fact numerous species may now be absent due to clearing operations and local extinction. **“Figure 8-9 Threatened Flora within the Perth Airport estate” (p. 217) does not show all the locations of the occurrences of Conospermum undulatum on the airport estate.**

We are also not sure why spending \$1.7 million on netting drains to prevent bird strike should come under the heading of “Recent Achievements” (p. 225) with regard to “Biodiversity Management.” But **these are minor issues in comparison to the overall failure of the Environment Strategy to make any real commitment to conserving biodiversity in situ and on a satisfactory scale.** Unfortunately this illustrates

how ineffective the Commonwealth's oversight of Perth Airport's environmental responsibilities has become.

The Urban Bushland Council believes **Aboriginal archaeological sites at Perth Airport should be protected**. We know that numerous artefact scatters have been destroyed by airport developments over the years and it reflects poorly on the airport leaseholder. These sites are of interest and significance to the whole community regardless of any specific consultations Perth Airport may undertake.

The **Per- and Poly-Fluoro Alkyl Substance (PFAS) issue** is a troubling one and the full extent of the problem at Perth Airport is taking a long time to come to light. Studies seem to have been delayed time and time again. It is our strong view that **contaminated soil should not be stored or used as fill on the Perth Airport site**. It is not yet really clear how dangerous the substance really is but it is known to be **highly mobile in groundwater and thus a potential hazard to surrounding districts over time**.

The UBC has already expressed its dissatisfaction with **airport environmental consultation processes** its representatives have been involved in past years, and we have no reason to believe Perth Airport is any more open to listening to community concerns about clearing operations than it ever was.

Something the UBC finds somewhat troubling is the extent of involvement Government agencies may have in the actual preparation of the **PDMP**. We would presume Perth Airport is not given the opportunity to gain tacit pre-approval from government agencies for contents of the **PDMP** because that would seem to go against the idea of releasing a document for public consultation that has yet to be approved. Indeed, if the community were to form the impression that contents of the PDMP were effectively already approved by government this would be even more discouraging than having your submissions totally ignored for nearly 20 years. Under the heading "Development of the Preliminary Draft Master Plan 2020", the following information appears:

Consistent with the Airport Development Consultation Guidelines, Perth Airport undertook an extensive consultation process prior to the development of the Preliminary Draft Master Plan 2020 (this document). This includes the release and engagement on an Exposure Draft version with Stakeholders. Perth Airport undertook the following activities prior to the release of the Preliminary Draft Master Plan 2020 for public comment:

.....
-release of the Exposure Draft Master Plan 2020 and briefings to Commonwealth Government Agencies, including:
.....

- Department of Environment and Energy, and
- Department of Infrastructure, Transport, Cities and Regional Development (P.243).

If these two abovementioned departments have already seen a draft **PDMP** and have been consulted regarding its contents – presumably including providing feedback, comments and suggestions then it is difficult to see how they would approach the **PDMP** released for public comment from a completely objective perspective when providing advice to ministers.

CONCLUSION

The Preliminary Draft Perth Airport Master Plan 2020 is an exceedingly disappointing and unacceptable document with regard to environmental protection. It fails to make commitments to protect extremely valuable native vegetation and habitat existing on the airport site on any scale, let alone an acceptable scale, and it is our very strong view that the Commonwealth should not approve a Draft Master Plan based on this document. Unless the issues the UBC have raised regarding the protection of native vegetation and habitat in situ are adequately addressed, the Commonwealth should not approve any Draft Master Plan 2020 produced by Perth Airport Pty Ltd.

The Urban Bushland Council WA inc. looks forward to a complete revision of the Perth Airport draft Master Plan 2020 so that all the now existing bushland and wetland areas are retained, protected, managed and restored to clearly identified Conservation Precincts.

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