



31st January 2023

Perth Airport Pty Ltd
mdp@perthairport.com.au

Dear Officers,

**SUBMISSION ON:
PERTH AIRPORT CENTRAL DRAFT MAJOR DEVELOPMENT PLAN (MDP)**

The Urban Bushland Council WA Inc. (UBC) is pleased to present this submission in response to your invitation to address the issues of relevance to us.

Urban Bushland Council WA Inc. (UBC)

The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity. <https://www.bushlandperth.org.au/>. We are a voluntary community association with an active membership of more than 85 volunteer groups (each with their own local membership from 10-165 individuals) and an additional 100 individuals – all with a common interest in conservation and protection of areas of urban bushland in WA.

UBC advocates to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature.

Support and commendation of NRPG submission

The UBC supports and strongly commends to you the comprehensive submission made by the Nature Reserves Preservation Group Inc. (NRPG), which proudly is also one of our member groups. As you are aware, NRPG has contributed significant knowledge, expertise, time and voluntary dedication as members of your Airport Consultative Environment and Sustainability Group.

General comments and submission

In addition, the UBC makes the following general comments and brief submission.

The draft MDP is a very lengthy document with more than 400 pages in Parts A and B. Part B is our main focus.

Non-aviation developments with associated clearing of the very high conservation value bushland and wetlands of Perth Airport lands are **not supported**.

It is deeply disappointing that the 2009 Master Plan which understandably acknowledged the significance of Munday Swamp and its surrounds in the 233 hectare Precinct 7 conservation area (page 40, 2009 Master Plan), and also the 76 hectares of bushland at the southern end of

the Airport land, were both abolished in the 2014 Master Plan. The 2009 Master Plan stated that Munday Swamp is '*ecologically and culturally significant*'. Five years later this significance was questionably downgraded.

It is well known and notable that Munday Swamp and surrounds remain as very high conservation value for flora, vegetation and fauna, as well as for Aboriginal heritage values. It comprises Guildford and Southern River vegetation complexes.

Less than 10% Guildford complex and less than 20% of Southern River complex remain on the Swan Coastal Plain.

This is well below the goal of retaining at least 30% of each complex.

The UBC **does not support more clearing** and loss of these complexes.

Also, there are at least three *Environmental Protection Biodiversity Conservation (EPBC) Act* Threatened Ecological Communities (TECs) present that are under threat by this proposal.

The UBC **strongly opposes** the continuing proposals for clearing of bushland and wetlands, patch by patch.

Even though the new Runway proposal has been approved, its need remains questionable. Given the outstanding significance of the remaining natural areas, it is suggested that the Airport Central MDP be reviewed so that there is no more clearing, or even better, that the Runway and the infrastructure requiring clearing be postponed indefinitely.

Part B

This Airport Central MDP proposal is for '*up to 42.37 hectares of native vegetation are proposed to be cleared for aviation development and to satisfy necessary aviation regulations*'.

This is a significant extent of clearing with loss of high conservation value bushland and wetlands. This should be greatly reduced.

Under Matters of National Environmental Significance (MNES), **10.24 ha of Banksia Woodlands of the Swan Coastal Plain** *endangered* TEC is proposed to be cleared.

On page 47, under "Significance of Residual Impacts" it states that this clearing is '*not considered significant at the local scale as clearing will reduce extent by 10.24 ha representing 7.08% of the occurrence on the airport estate*'.

This does not justify the clearing as it is contrary to the Approved Conservation Advice under the *EPBC Act* for the listing of this community as endangered.

The Advice states:

- '**PROTECT the ecological community to prevent its further loss of extent and condition**'
- '**RESTORE the ecological community...**'

Thus, there should not be any more clearing of this Banksia Woodlands TEC.

Patch 12

Clearing of 7.25 ha of the 9.71 ha of Patch 12 will mean that only 2.46 ha of Patch 12 will remain. Edge effects will also be significant, adding further degradation impacts. This is unacceptable.

Cumulative impacts do matter

As you are aware, Perth Airport is responsible for significant cumulative clearing of local bushlands and wetlands. Often this is disguised by highlighting the next proposal without investigating the true cumulative impact/s.

This draft MDP, together with the Southern Aviation Support Precinct and Construction of Taxiway Charlie Extension (2013), Direct Factory Outlet (2016), New Runway Project (2018) and Airport West (South) (2020), have all resulted in significant losses of this Banksia Woodlands TEC and other natural habitats including associated fauna.

There has been a **cumulative total of 784.08 ha of impact area** with the recently approved New Runway Project adding 292.8 ha.

This draft MDP does acknowledge that the cumulative loss of bushland for future projects for Airport North, Airport West (South), and for this Airport Central will be **90.88 ha**. Whilst this is a significant area of further loss, the MDP states that this loss *'represents a small fraction of the TEC remaining on the Swan Coastal Plain'*.

This is not a valid reason or justification for the clearing and **net loss of a TEC**.

The cumulative **total loss of 67% of native vegetation on Airport land** is a major telling point and issue, particularly since further losses are increasing with each new development on the estate, and within the Metropolitan area and State-wide.

Offsets are not valid

Offsets are not valid as the net loss and its impacts will remain. This clearing will be a very significant impact which is unacceptable. The **avoid** principle should be applied.

With less than 30% of this Banksia Woodlands TEC remaining, and much being fragmented, it is at high risk of decline to extinction. To allow further clearing is also in conflict with Minister Plibersek's 2022 commitment to 'no new extinctions' and to rebuild nature.

Offsets as in 3.8.6 – The Offset Policy and guidelines are flawed, as a net loss of the values being offset always results.

3.11.4 Significance of Residual Impacts

This section states: *'The Airport Central TDA potentially reduces the extent of Bassendean 1001 and 1018 to 21.35% and 14.63 %, respectively of the pre-European extent.'*

All losses under 30% are significant. This should be recognised, and any clearing of these communities should be avoided.

Implications of UN Biodiversity Agreement, December 2022, with 4 Goals and 23 Targets (attached)

Convened under United Nations (UN) auspices, chaired by China, and hosted by Canada, the 15th Conference of Parties to the UN Convention on Biological Diversity adopted the *"Kunming-Montreal Global Biodiversity Framework"* (GBF), including four goals and 23 targets for achievement by 2030.

Australia is one of the 188 nations that agreed to this package of measures to address the loss of biodiversity and restoration of natural ecosystems.

Refer especially Goal A and Targets 3, and 4. It applies to all lands.

Thus, Perth Airport Pty Ltd now has a duty to plan future protection and management of **all** the remaining natural areas of the Airport. The proposed future clearing of 90.88 ha of

Airport lands should not proceed.

Also existing natural areas should all be declared as *conservation precincts* and should be actively managed to retain and restore their values.

Impacts on Fauna

The draft MDP states:

“The four major development projects proposed for the airport estate for which boundaries are currently defined (Airport Central, Airport North, New Runway Project and Airport West (South)) will result in the loss of up to 523.84 ha of fauna habitat. Cumulative impacts to fauna include up to:

- *510.47 ha of foraging habitat for Carnaby’s Black-Cockatoo;*
- *196.35 ha of foraging habitat for the Forest Red-tailed Black-Cockatoo and Baudin’s Black-Cockatoo;*
- *195 Marri trees and 70 Jarrah trees that met the basic criterion of 500 mm DBH for black-cockatoos. Of these, 16 trees (seven Marri and nine Jarrah) had hollows that might currently be useful to the species (category 3 trees).*
- *510.38 ha of Quenda habitat;*
- *13.46 ha of Rakali habitat;*
- *38.47 ha of native bee habitat; and*
- *Loss of virtually all upland habitat close to the southern section of Munday Swamp, adversely impacting species that use both wetland and upland environments. This would include frogs that rely on upland environments for much of the year (affected by the New Runway Project) and Long-necked Tortoises that nest in upland environments (affected by the New Runway Project).”*

These are very large and significant impacts. Clearing of habitat for all these endangered and other species should not be permitted and not take place. The endangered **Carnaby’s Cockatoo** and the vulnerable **Forest Red-tailed Black Cockatoo** and **Quenda** are iconic species. **All their existing** habitat on the Airport estate must be retained and managed.

Impacts on Groundwater

The natural groundwater level on Airport lands is close to the surface. Indeed, much of the native vegetation is classed as vegetated wetland.

Land clearing and increased areas of hard surfaces with new drains will have significant hydrological changes and impacts on Munday Swamp and its surrounding vegetation, and on vegetated and wetland areas which are hydrologically downstream.

The draft MDP does not give adequate information on the impact of cumulative hydrological changes on Munday Swamp and on surrounding and downstream vegetation. This should be provided from advice by groundwater hydrology experts.

It is vitally important that the hydrology of Munday Swamp is maintained in order to protect and maintain its complex ecosystem and habitat of its species of flora and fauna as well as for its cultural significance for the Noongar community.

Significant impacts on Wetlands

7.6 Significance of Residual Impacts states:

*“Clearing associated with the Airport Central project will result in the **loss of 28.3 ha of wetland**, approximately 9.1% of the wetland areas within the Perth Airport estate which retain ecological values (equivalent to a CCW or REW). Despite significant historical*

disturbance, these wetlands have been assessed as either wetlands of the highest priority or wetlands having rehabilitation potential.”

This is a very significant impact and is unacceptable. The project should be modified to **avoid all** these impacts on wetlands and their buffer zones.

Both direct and indirect impacts on **Munday Swamp and its surrounds** must especially be avoided. Protection of the buffer zone vegetation on the west side of Munday Swamp must be maintained. Advice for protection of this outstanding and unique Aboriginal heritage site should be sought from Noongar elders. Protection of Munday Swamp is of the highest priority.

12.5 Proposed Offset Sites

There are five (5) sites proposed as bushland sites to be acquired and added to the conservation estate, but these are very distant from the Airport and are not ‘like for like’ vegetation communities. Thus, there will be a **net loss** of the vegetation communities as at the Airport, and **no net gain** in native vegetation as the offset sites already exist. Thus, this offset policy and guidelines process is flawed and does not justify the destruction of irreplaceable biodiversity on Airport land. As NRPG has explained, this process should be halted until the changes are made to address the failure of the *EPBC Act* to provide and enforce an effective process.

Conclusion

The continuing loss of the outstanding biodiversity at Perth Airport through clearing for non-aviation developments and for airport facilities and infrastructure is unacceptable.

As expressed by NRPG in their submission, until the deficient *Environmental Protection and Biodiversity Conservation (EPBC) Act* is fundamentally reformed as recommended by Professor Graeme Samuel’s official Review, and there is a credible plan for the rebuilding of Nature (‘Nature Positive Plan’) by the federal government per Minister Plibersek’s 2022 commitment, federal approval of this and subsequent Major Development Plans for the airport estate must be paused.

Yours sincerely

Chairperson
Urban Bushland Council WA Inc

cc Department of Climate Change, Energy, the Environment and Water Kylie.Calhoun@dceew.wa.gov.au

cc Nature Reserves Preservation Group Inc. (NRPG) smgates@tpg.com.au

ATTACHMENT: Please find attached a copy of the 19 December 2022 press release by the Convention on Biological Diversity entitled: ***Nations Adopt Four Goals, 23 Targets for 2030 In Landmark UN Biodiversity Agreement.***

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