



2nd March 2023

Perth Airport Pty Ltd
mdp@perthairport.com.au

Dear Officers,

**SUBMISSION ON:
PERTH AIRPORT NORTH PRELIMINARY DRAFT MAJOR DEVELOPMENT PLAN**

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

Quote from the MDP: *'This Major Development Plan has been prepared by Perth Airport for the purpose of seeking Commonwealth approval for clearing and site preparation works within the Airport North project area. The proposed scope of works in Airport North as part of the approval currently sought include vegetation clearing and site preparation, earthworks, service diversions and installations, road network construction, and landscaping and signage.'*

In summary, we submit that this Airport North MDP proposal to clear, disturb and fragment high conservation value bushland and wetlands and Aboriginal Heritage sites for non-aviation developments is unacceptable.

Comments are made on parts of the lengthy documents as below.

DRAFT MDP PART A: Background, Planning, Socio-economic, Traffic and Aviation impacts assessment

This states that the total MDP Study Area is 248.03 ha of which ‘developable land’ is 125 ha, but this understates the extent of clearing and disturbance. This proposal is for non-aviation development, and would provide for industrial land development. The scope of works to prepare the site for this development includes land clearing, earthworks and site preparation, service diversions and installations, road network construction, landscaping and signage – which is in addition to the 125 ha of ‘developable land’.

All this disturbance and fragmentation will totally destroy the integrity of the existing natural landscape and its biodiverse ecosystems. Of the total MDP Area, only 34.38 ha is proposed to be the ‘Retained Vegetation Areas’ and these are fragmented in 3 separate blocks.

Notably these 3 separate areas will inevitably suffer degrading impacts of edge effects.

Also ‘Revegetation Areas (including a living stream)’ are 53.13 ha.

Notably revegetation will not replace the diversity of the existing complex natural ecosystem.

Sustainability: Pages 23-25 claim to ‘establish and maintain ecology and to embed sustainability’.

This is not the reality as in a sustainable society, nature is no longer being destroyed. The development proposal will disturb and destroy the natural ecosystems of most of the MDP Area.

The development is being justified by the words: ‘*Retain, rehabilitate, and connect high quality Banksia Woodlands clusters with new native landscape planted green links.*’

The reality is that there will be a significant net loss of the existing native vegetation.

Replanting connections does not justify this clearing, ground disturbance and significant net loss of MNES including Banksia Woodlands of the Swan Coastal Plain *endangered* ecological community, black cockatoo habitat, and rare flora.

Cultural heritage: All clearing is loss of country and Aboriginal cultural heritage. This is unacceptable given that Munday Swamp and its surrounds of bushland including the Airport North area are of very high Aboriginal heritage value. A 100m buffer zone of protection around Munday Swamp is not enough, and does not justify all the loss from clearing and disturbance proposed.

Fragmentation: The design proposals will result in extreme fragmentation of the native vegetation, and there will be significant impacts on significant fauna and flora and vegetation complexes due to loss of connectivity.

4. Project justification on pages 32-34:

The so-called economic and employment benefits shown from the industrial land developments are not appropriate reasons to support this MDP. The role of Perth Airport (PAPL) is to provide airport facilities, and the Airport land is for aviation purposes, but this MDP is not for aviation purposes.

Generating so-called employment opportunities is not the role of PAPL. The MDP area currently provides a safety and pollution buffer zone around airport facilities and this should be maintained.

The status and reality of the natural environment must come first and be the over-riding consideration in planning. Importantly the MDP Area should all be returned to ‘**Conservation Precinct**’ status for protection of its outstanding natural ecosystems *in perpetuity* (as in the 2004 Master Plan). The ‘commercial zone’ status should thus be changed to ‘**Conservation Zone to be protected in perpetuity**’.

4.4 Environmental benefits – on page 34

There will still be a very significant net loss of environmental values from the industrial developments. The benefits described do not justify this net loss. Hydrological changes and impacts will also be significant.

6.3 Perth Airport Master plan – on page 40

Under Section 70 of the Act, one of the purposes stated of a Final Master Plan for an airport are to:

‘Establish a framework for assessing compliance at the airport with relevant environmental legislation and standards,’

In order to comply with the Approved Conservation Advice for the *EPBC Act* listed Banksia Woodlands of the Swan Coastal Plain *endangered* ecological community, which states: ‘PROTECT the ecological community to prevent its further loss of extent and condition’, there should not be any more clearing of the Banksia Woodlands on the Perth Airport estate. Preventing loss of extent means no more clearing, and preventing loss of condition means no disturbance or changes to groundwater and water runoff.

State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region – on page 47 While it is stated that SPP 2.8 identifies Bush Forever sites on the Perth Airport estate, it also says that the policy does not directly relate to the activities on the Airport estate. Thus the need for conservation of these significant bushland and wetland areas is dismissed as not applicable to these Commonwealth lands. This is unacceptable. The Bush Forever Site 386 identification details the high conservation values of the site.

Consistency with State and Local Government Planning – pages 47-55 for State.

In contrast with the above, on pages 47 and 48 it explains that the MDP is consistent with SPP 4.2 and SPP 5.1 and with other planning strategies at State and Local Government levels. But inconsistency of the MDP with SPP 2.8 and Bush Forever Site 386 must be recognised too. This inconsistency is not acceptable as protection of the environment must come first. The reality of the landscape ecosystem must be recognised and respected.

12.5 Part 13 Permit Under the EPBC Act – on page 94 quote:

‘Under Part 13 of the *EPBC Act*, a permit to clear threatened species and ecological communities must be obtained from the Department of Climate Change, Energy, the Environment and Water prior to clearing any Matters of National Environmental Significance. This process will be completed in parallel to this MDP public comment and approvals process.’

DRAFT MDP – PART B: Environment and Heritage Assessment

The Total Disturbance Area (TDA) is 213.65 ha out of the Total MDP Area of 248.03 ha. This leaves only 34.38 ha ‘undisturbed’, but there will also be significant degrading edge effects around these separated areas. They will be further disturbed and degraded.

Given all the very high conservation values of this natural landscape of bushland and wetlands, this significant loss of MNES is totally unacceptable for the proposed non-aviation developments.

Airport buffer zone: We submit that the TDA as shown in Figure 1-2 lies within the safety and noise and pollution buffer zone of the Airport’s facilities, especially the runways. The bushland and the eleven identified wetlands are also of high Aboriginal heritage value and this should be respected.

On these grounds alone, these non-aviation development proposals are unacceptable and should be withdrawn.

Significant environmental and heritage factors

3. Flora and vegetation

There are 9 vegetation types as shown on ‘Figure 3-1: Vegetation Types in the Airport North project area’. This is a very diverse and species rich natural landscape of bushland and wetlands which is a significant feature in itself. The Airport North MDP proposal to clear any of this high conservation value bushland and wetlands is unacceptable.

Page 35 gives details of the 2 threatened ecological communities (TECs) present in the MDP Area:

- 1) Banksia Woodland of the Swan Coastal Plain – endangered under the *EPBC Act*.
See comments below.
- 2) SCP 3b *Corymbia calophylla - Eucalyptus marginata* woodlands – vulnerable under WA State legislation.

There should not be any clearing of these TECs and their buffer zones.

3.3.3 Conservation Significant Flora –7 species are listed on page 36.

In addition, another 11 threatened species are reported within the airport estate, but were not found to

be present within the MDP area. More surveys may find these to be present in the MDP area. These 18 significant flora are evidence of the outstanding species richness on airport lands but which are now under threat and are reason there should be no more clearing and vegetation disturbance in the MDP area.

Dieback extent: Figure 3-4 on page 39 shows the extent of areas infested with *Phytophthora cinnamomi* (dieback). This extent is questionable given the good condition of Banksia Woodlands in the area. It should not be used to justify clearing.

Matters of National Environmental Significance (MNES) under the EPBC Act.

1. Banksia Woodlands TEC: The proposed clearing and disturbance of Banksia Woodlands of the Swan Coastal Plain endangered ecological community is inconsistent with its Approved Conservation Advice under the EPBC Act which states that the goal is to 'PROTECT the ecological community to prevent its further loss of extent and condition'; and to 'RESTORE the ecological community'. This means there should be no clearing of this TEC in the MDP.

Also there should be a buffer zone of preferably 50m protection around the Banksia woodlands.

On page 40, it states there are 58.56 ha of the Banksia Woodlands TEC in 4 patches in the TDA, and that 33.07 ha will be 'directly impacted' in these patches 13, 14, 15 and 16 by the TDA. In the table it says clearing is the direct impact. Also, that only ~25.49 ha will be retained. The extent of clearing and 'direct and indirect impacts' is not clear. It is stated that habitat fragmentation in patch 15 will be a 'severe' indirect impact. Also that reduction in local genetic diversity will be 'severe'. **All these impacts are unacceptable and should not be permitted.**

Groundwater hydrological changes is a predicted 'indirect' impact.

The depth to groundwater is predicted to be reduced, this means the groundwater level will rise. Notably natural groundwater levels in the MDP area are already close to the surface and areas are classed as vegetated wetlands. Wetlands are also present. The landscape is flat and thus is flood prone. This natural feature makes the MDP area unsuitable for industrial development with much hard surface inevitable which will increase runoff and which will therefore increase the risk of flooding. Also with more extreme weather events likely due to climate change, the flood risk of Airport and surrounding lands is increased. Recent flood events in the eastern states must surely be a warning signal for the flood risk to the eastern side of the Swan Coastal Plain which includes the MDP area.

On these grounds alone the MDP is unacceptable.

2. Black Cockatoos: The three species of black cockatoo are endangered and their habitat in the MDP Area should not be cleared or lost.

The MDP should be referred to the federal DCCEEW for assessment under the *EPBC Act* of impacts on the three threatened black cockatoo species: Carnaby's Black-Cockatoo, *Calyptorhynchus latirostris* (Endangered); Baudin's Black-Cockatoo, *Calyptorhynchus baudinii* (Vulnerable); and Forest Red-Tailed Black-Cockatoo, *Calyptorhynchus banksii naso* (Vulnerable).

6. Wetlands – pages 188-205

There are 12 priority wetlands in the MDP area comprising 5 Conservation Category Wetlands (CCW) covering 19.6 ha, and 7 Resource Enhancement Wetlands (REW) covering 25.7 ha giving a total of 45.3 ha of wetlands that will be 'impacted'.

Of the 21.0 ha CCW occurring within the MDP area, only 1.4 ha will be retained and 19.6 ha will be cleared, with 1.8 ha of 'impact area' to be improved via revegetation.

This clearing is totally unacceptable.

Of the 32.2 ha of REW occurring within the MDP area, 6.5 ha will be retained and 25.7 ha will be cleared, with 2.6 ha of this 'impact area' to be revegetated.

This clearing is unacceptable destruction of this complex wetland ecosystem.

There will be a loss of 14% of priority wetlands within the airport estate.

This is a very significant and unacceptable impact on the ecosystems of the Airport lands.

The wetland ecosystems and their buffer zones cover much of the Airport lands.

All clearing and all impacts on wetlands should be avoided.

Also, construction activities for roads and buildings and infrastructure would have an adverse impact on drainage to wetlands from soil disturbance and potential contamination. Justification of wetland destruction by 'modifications' are not acceptable.

Fragmentation and loss of wetlands will have a detrimental impact on fauna (as described on page 199) and this is also unacceptable.

There will also be an impact on water levels in wetlands due to the altered hydrology (as described on page 200) and this is unacceptable. Contaminants and eroded soil will drain to wetlands too.

7.4 Acid Sulfate Soils (ASS and PASS) – pages 231-234.

Acid Sulfate Soils (ASS) exist in the MDP area. During construction and development works, ASS (and Potential ASS) must never be dewatered. The changes with acidification are irreversible. WA Government ASS scientists and experts have given this advice for many years.

With high water tables, this is another reason why the MDP area with its inherent ASS is not suitable for industrial development as proposed.

9. Heritage – on pages 239 – 256.

This lengthy section describes the Aboriginal heritage issues. All the bushland and wetlands on and adjacent to the MDP area have important Aboriginal heritage values. On these grounds alone, all clearing and disturbance of country should not be permitted, and its native vegetation and wetlands should be retained and protected. This is another reason alone, out of respect for Aboriginal values and country, that the MDP area should be changed to a Conservation Precinct and Conservation Zone. The proposed industrial land use on Airport lands is unacceptable.

12. Offsets – pages 265- 326.

The proposed offsets, being in the order of 80-100 km away, are not acceptable as they are not 'like for like', and they provide no local functionality or representation to support the remaining fragmented areas. Importantly, all offsets result in a net loss of the complex ecosystem, and so-called 'rehabilitated area offsets' do not replicate the original complex biodiversity of an area. Thus offsets do not justify loss of the unique high conservation value native vegetation and wetlands and their flora and fauna.

There will remain a net loss of the Banksia Woodlands of the Swan Coastal Plain TEC, and of the SCP 3b Marri Jarrah Woodlands. Also there will be a net loss of habitat for our iconic and much loved Carnaby's Cockatoo, Forest Red-tailed Black Cockatoo and Baudin's Cockatoo. Similarly for the loss of endangered flora species.

The very small percentages of remaining natural vegetation complexes on the Airport estate, are already mostly below those recommended by the EPA 2001 advice. Even more importantly, the percentages are all well below the 30% target agreed to at the COP 15 UN Biodiversity Agreement (December 2022). Australia is party to the COP 15 Agreement. Its Goals and Targets for biodiversity retention and protection and restoration apply to all levels of government and to whole-of-society.

13 Conclusion - page 327.

This states that clearing of 104.71 ha of native vegetation is required for the development in the TDA of 213.5 ha. This clearing of high conservation value bushland is unacceptable.

It is also stated that: 'it was found that over 50% of the project area is comprised of 'completely degraded' or 'degraded' native vegetation areas with the remaining project area comprising vegetation in varying condition.'

This does not justify the clearing, disturbance and losses of these areas.

The proposed clearing of the two TECs is unacceptable: '33.38 ha of the Commonwealth-listed TEC Banksia Woodlands of the Swan Coastal Plain is proposed to be removed in addition to 14.49 ha of State-listed SCP3b TEC'.

Dieback: It is stated that ‘the recent Dieback Survey found that approximately 97.71 ha of the vegetation within the MDP area is infested with *Phytophthora cinnamomi* (Dieback)’. This extent is questionable and does not justify clearing in these areas.

Fragmentation and connectivity: There will be 55 ha of retained areas containing the highest quality vegetation and habitat within the MDP to provide for ecological corridors and connectivity between remnant parcels. This will include a 100 m buffer around Munday Swamp and a 50 m wide corridor along the northern boundary of the MDP area, providing vegetated connectivity between the areas of retained vegetation and wetlands in the north of the MDP area and adjacent areas. But these retained areas will be isolated and this will negatively impact on fauna movement. Replanting corridors does not justify the clearing.

MNES fauna: Ten conservation significant fauna were identified as being regularly present within the project area, including three MNES (the Carnaby’s Cockatoo, Forest Red-tailed Black Cockatoo and Baudin’s Cockatoo), three species listed as Priority Species by the State Government (including Quenda (southern brown bandicoot), Rakali (water-rat) one invertebrate (Woollybush bee species *Hylaeus globuliferus*) and four bird species. They will all be negatively impacted with loss of habitat and connectivity and this is unacceptable.

Wetlands: Up to 45.3 ha of wetland vegetation will be directly impacted, including approximately 19.6 ha of the 5 CCW wetlands, and 25.7 ha of 7 REW wetlands. To justify this destruction of these wetlands, the ‘Living Stream’ proposal will provide ecological linkages between the retained wetlands and Munday Swamp.

This does not justify destruction of the wetlands and their associated bushland.

Offsets: Significant residual impacts of the Airport North project to one MNES TEC, three protected species and Wetlands (in context of the Whole Environment impact) have been considered and offset packages proposed. Impacts to the Banksia Woodlands TEC, to the 3 species of Black-Cockatoos, and to Wetlands will be offset through either a land purchase and/or restoration component.

All the losses of and impacts on TECs, endangered flora, significant fauna habitat, wetlands, hydrology impacts, etc are justified with offsets as detailed.

But these offsets still result in a net loss of the conservation areas and flora and fauna. Thus offsets do not justify loss of these. This offset approach is not supported.

Aboriginal cultural significance: There is recognition of the Aboriginal cultural significance of the MDP and wider airport estate, but this does not extend to retaining all the Aboriginal country of bushland and wetlands in the MDP area.

Conclusion

The Urban Bushland Council does not support the Airport North Preliminary Draft MDP. There is a significant loss of multiple environmental values and this is environmentally unacceptable. It is recommended that the MDP be completely revised to a Conservation Zone plan for conservation and management of all the native vegetation, wetlands and its native flora and fauna.

Yours sincerely

Chairperson
Urban Bushland Council WA Inc