

President:
Tony Fowler
Ph: 9293-2283
fowlerak@iinet.net.au
Vice President
Steve Gates
smgates@tpg.com.au
Ph: 9293 2915



P.O. Box
656
Kalamunda,
W.A., 6926

Nature Reserves Preservation Group, Inc.

Date: 14 September 2014

**TO: Master Plan Submission, Perth Airport Pty Ltd, PO Box 6
Cloverdale WA 6985**

**CC: Rhonda Hardy, Chief Executive Officer, Shire of
Kalamunda.**

Subject: Perth Airport Draft Master Plan 2014

The Nature Reserves Preservation Group (NRPG) Inc. is an environmental umbrella group based within the Shire of Kalamunda. For 25 years, it has served as a forum for local environmental issues. Since creek lines, under rehabilitation by NRPG within the shire, flow into the Perth Airport wetlands and thence to the Swan River, NRPG has also extended its ambit to address concerns over environmental problems on the Swan Coastal Plain. This current submission is once again made on the basis of these creek lines flowing into the Airport wetlands, and our extreme concern over the continuing loss of remnant bushland within the Airport estate through clearing.

NRPG has, over several years, made submissions on Perth Airport, State and surrounding Local Government initiatives including:

- Perth Airport BGC brickworks.
- Draft Kewdale-Hazelmere Region Integrated Master Plan.
- MRS Proposed Amendment #1082/33 Bush Forever and Related Lands.
- Bushland Policy for the Perth Metropolitan Region. Statement of Planning Policy 2.8.
- Wetlands to Wastelands Seminar: The future of bushland at Perth Airport 2004.
- Revised Draft Environmental Protection (Swan Coastal Plain Wetlands) Policy and Regulations. The submission acknowledged the undisputed value of our wetlands culturally, being of immense significance to the original custodians of the area and environmentally, comprised of some of the richest ecosystems in the region.
- Perth Airport Preliminary Draft Environmental Strategy 2009-2014

As a result of this last submission, NRPG was invited to join the Perth Airport Environmental Consultative Group (ECG) and much later, the Community Aviation Consultation Group (CACG), recently disbanded.

Incorporating the AES within the Master Plan.

The “extension” of the Environment Strategy (AES) 2009-14, approved by the Minister, offered the possibility of leaving the Strategy intact and incorporating it whole into the Master Plan (MP). Failure to do this serves to diminish the perceived importance of the natural environment component of the estate. When a discrete document, the AES was available in its entirety, with distinct structure, clearly-stated objectives and plentiful environmental photographs.

Incorporating the AES in the MP could have enabled it to reach a wider audience. Unfortunately, rather than seizing this opportunity, the incorporation has resulted in the ‘burial’ of the AES within the MP. Characteristic of this burial is the paucity of ‘environmental’ photographs. The previous AES had a total of 14, including front and back cover and one of cultural interest. The current Master Plan has, in its incorporated Environment Strategy, three photographs only (including half-page format). The rest of the MP contains over 40 such images, ranging from full page through photo-montage to half-page format. It seems Perth Airport has foregone a unique opportunity to emphasise the beauty and value of these natural areas and its own commitment to preserving them, despite being obviously aware of these values. (Section 9.7 “Biodiversity”)

Attendance at a Master Plan Stakeholder workshop revealed a widespread lack of interest, from many present, in the fate of the natural environment on the estate. Many of those would never read section 9 of this MP. Failure to mention the environmental biodiversity and values of natural assets, past achievements and future objectives in “Benefits of Perth Airport.” (p.42), signifies a missed opportunity. It is almost as if the MP (with the exception of the AES Section 9) has been re-drafted, ignoring the implications of the incorporation of the AES.)

The overall structure of the MP

Throughout the MP the use of vague, imprecise terminology to define actions or intentions, gives little confidence that the end result will benefit the environment. Eg. The Airport must not “inappropriately impact the natural environment or the standard of living of those people who live near the airport.” (C.E.O. Foreword p.13). Giving the ‘natural environment’ and ‘standard of living’ equal emphasis, is characteristic of the failure (apart from within the Environment Strategy) to emphasise the importance of the natural environment to the value of the whole estate.

Key objectives for the MP include: Ensuring “development meets environmental obligations and the airport’s development and operations respect the strong bonds that exist between the Noongar people and the land comprising the Perth Airport estate.” (p.16). We strongly support the objectives and, whilst endorsing them, urge the following suggestion be considered.

- Although key objectives of the Environment Strategy are dealt with later in more detail, in the above section, please consider repeating the objectives stated in the AES 2009 (p.vi) and adding “The incorporation of the Airport Environment Strategy into the Master Plan gives Perth Airport an opportunity to address current environmental issues and to demonstrate its leadership in environmental excellence.” [paraphrasing part of the above].

Loss of Conservation Precincts 5 and 7.

The absorption of the Conservation Precincts 5 and 7 into five precincts and up to four land use zones within each precinct is confusing. The wording used, once again highlights an apparent unwillingness to commit to concrete actions. In defining the new Precincts, phrases such as “...will integrate within the land’s environmental value” and “while managing the environmental values of the area.” (Executive Summary p.18) give little reassurance. With the loss of these precincts, will there no longer be a Conservation Management Plan, nor a Conservation Completion Plan and, what will replace the Ecological Stepping Stones of the 2009 AES?

The loss of these Precincts fails to give the natural environment of the estate its due prominence. Set up in recognition of the value of remnant bushland and, “...an important aspect of maintaining...biodiversity values” these precincts were an integral part of the AES and its measures to protect biodiversity. The assertion that “...this [abandonment of Precincts 5 and 7] ensures that areas of high environmental value that were outside the previous Conservation Precincts are considered in land use planning and development” fails to reassure.

It also ignores the fate of areas of degraded natural vegetation which, despite their condition, serve as buffer zones, link ways or potential wildlife corridors. Some of these serve to protect areas of high environmental value. The loss of these areas of remnant bushland will continue, since they are offered no protection under the Master Plan. Our concern is that the commercial imperative to return a profit will result in such areas of partially degraded bushland being cleared for developments, regardless of their value, even in their degraded state, as useful linkages or wildlife corridors.

Seeing these precincts consumed, within the land use zonings, by “Airport” and “Commercial” in Airfield, Airport North and Airport South precincts, raises more questions over their eventual fate. Given the proposed fragmentation of the previous Conservation Precinct 7 under the “Five year ground transport plan concept for Airport North” (Fig 6.7), how will the environmental values of the area be “integrated”? Dividing an environmentally valuable and currently intact, segment of the estate into unsustainable fragments, by the construction of roads is a potential environmental disaster. One must question the necessity for and the location of such roads.

Proposed use of onsite and offsite offsets to compensate for loss of areas of remnant vegetation through clearing.

Will such offsets be occurring under a bi-lateral agreement between State and Commonwealth? Or will the State (under the E.P. Act 1986) and the Commonwealth (under the EPBC Act 1999) be assessing these under separate processes?

The application of such offsets is of great concern in the wake of experiences, related to minerals and energy projects, in other states. Whilst the offsets concept may be sound and Perth Airport fully aware of its responsibilities under legislation, we still have concerns. Given the general tenor of the Master Plan, the chance of securing "...environmental protection onsite through appropriate caveats..." seems unlikely. Could examples of such caveats be outlined?

Despite the intention that:

- "Environmental offsets will only be considered after avoidance and mitigation options have been pursued." (Clearing of native vegetation offsets process under Environmental Protection (EP) Act 1986. (W.A. DER August 2014))
- "Offsets provide environmental benefits to counterbalance the impacts [residual impacts] that remain after avoidance and mitigation measures." (EPBC Act Environmental Offsets Policy, October 2012.)

We are concerned that Perth Airport may be tempted, by commercial imperatives, to use offsite offsets as a 'universal panacea' for loss of vegetation, habitat and biodiversity on its estate. In the case of offsite offsets, will Perth Airport, having transferred the management of the offset areas to the Department of Parks and Wildlife (DPaW), ensure the State Government provides the necessary increased funding as an integral part of that transfer? This will be needed to enable DPaW (already financially stretched to the limit) to manage these areas efficiently.

Concerns:

- We no longer have Conservation Precincts 5 and 7 clearly defined. Established in recognition of "the value of remnant bushland", the loss of these two precincts means a devaluation of the previous Five Year Action Programme and the Conservation Completion Plan.
- The continued clearing of remnant natural vegetation in areas considered to have little environmental value. These degraded areas of remnant bush, in many cases still serve as 'buffers' for areas of higher conservation value.
- The emphasis placed on "...the redevelopment of land not currently required for aviation purposes for productive commercial development" leads to the implication that there should be **no** hindrance to this 'redevelopment.' "...any restrictions on PAP operations would lead to...if Perth Airport's operations were restricted." [Executive Summary p.17] The summary gives further cause for concern and is in stark contrast to the corresponding segment of the AES 2009.
- The failure to openly acknowledge the nexus between the airport estate and surrounding initiatives such as the Wildlife Corridor and Creek line Strategies of the Shire of Kalamunda, Hasluck's Green Map and a potential Foothills Regional Park. Despite the stated intention to work closely with surrounding local authorities, airport developments still appear to be viewed in splendid isolation.
- The EMF graphic (Fig. 9.1) despite incorporating a "Continuous Improvement Loop" reads less clearly than the Fig. 1 (AES 2009 p.6). Repeating Fig.2 and Fig.3 (ibid p.13 and p.14) in this section of the Master Plan would be beneficial.

NRPG Recommendations.

- That the extent of loss of natural habitat and biodiversity envisaged during the life of this MP be described in detail.
- That examples of the mechanisms for securing “...environmental protection” be described.
- That areas deemed “Environmentally significant” by PAP (although we have none under the Act and no definition, description, nor methodology for determining same) be clearly identified, the extent of those areas be described and the proposed level of protection clearly defined.
- That the need for and location of proposed access roads through Airport North Precinct be examined, in light of the inevitable damage to the biodiversity values of the area, should these roads be created.
- That the limits of the features referred to as Munday Swamp, Northern Wetland, Runway Swamp and Kwenda Marlark Wetland be clearly defined in airfield figures. This will become increasingly important when establishing approach lighting for new runway 21L and accommodating the proposed (if required) extension of RW 06/24 to the NE. Currently, Fig.9.9 “Wetlands on the Perth Airport Estate” is far too vague.
- That a commitment be given to protect the integrity of Munday Swamp in perpetuity despite commercial pressures.
- That artefacts, including those recently discovered (Precinct 3b) be placed on display within the International and/or Domestic Terminals. Artworks, together with interpretive didactics, would outline the historical importance and cultural significance of the Airport estate to the Noongar people.
- That the “Climate Change” section of the Master Plan 2009 be reinstated in the introduction section of the incorporated Airport Environment Strategy or the Master Plan. Currently, I can find no mention of the topic in this draft.
- That assurances be given that environmental offsets will be considered only after avoidance and mitigation options have been pursued and exhausted.
- That dot point (“Utilising the Commonwealth Governments offsets policy” p.20) be amended to read: “After all avoidance and mitigation options have been pursued and exhausted.”
- That the term “discretionary use” (Land Use Zonings) be explained.
- That the principle of “Ecological Stepping Stones” (Airport Environment Strategy 2009) be re-established.
- That the Master Plan “Introduction” summarises briefly, the environmental assets, values, past environmental achievements and clearly states future environmental objectives.
- That the Executive Summary includes “Key Objectives” of the incorporated Environment Policy as defined in the AES 2009 p.vi and adds, “The incorporation of the Airport Environment Strategy into the Master Plan, gives Perth Airport an opportunity to address current environmental issues and to demonstrate its leadership in environmental excellence.” [paraphrasing part of the above p.vi]

- That, in line with “the importance of Integrated Planning” closer collaboration with surrounding local governments be established on all environmental topics. Local Planning Schemes or Strategies may have an impact on the natural values of the airport estate. Currently, the sole environmental aspect to receive such close collaboration appears to be that of aircraft noise.
- That all figures be A3 size pull-outs (as in the Airport Environment Strategy 2009) for easier reading of the fine detail. The current A4 format is totally inadequate.

Conclusion.

In informal discussions with environmental staff, it was obvious that the natural environment is still important and the need for its conservation and protection acknowledged. Unfortunately, these sentiments are lost within this Master Plan. The failure to state clearly the perceived threats to biodiversity and natural values from the planned developments, to specify actions designed to combat these threats and to emphasise Perth Airport’s commitment to preserving these natural values is regrettable. The loss of defined Conservation Precincts 5 and 7 and their absorption into the new precincts, points the way to further loss of protection for those conservation areas.

The language used when discussing environmental responsibilities and actions, gives far too much “wriggle room” to potential developments on the estate, through the use of vague or ambiguous words and phrases. Little confidence can be placed in such language. There is a need to use plain and unambiguous wording in the text.

Perth Airport is however, to be complimented on several aspects of the Master Plan. Its continued focus on sustainability, its innovations in the built environment, waste-reduction strategies and its continuing engagement with the Noongar people are strongly supported by NRPG. We would urge Perth Airport to seize this opportunity, through its Master Plan, to demonstrate its commitment to preserving the environmental integrity of the natural and cultural heritage of its estate.

The environmental and cultural assets on Perth Airport’s estate are unique within Australia. The mandated incorporation of the Airport Environment Strategy in the Master Plan presents a unique opportunity to showcase these. Highlighting the value and the proposed management of these in the Master Plan would ensure all those involved with the day-to-day operations of the Airport are aware of the value of these assets and of the commitment of Perth Airport to their long-term survival.

We trust that our comments, concerns and recommendations will all be addressed and that comprehensive feedback will be provided in due course.

Tony Fowler,

President.