

PERTH AIRPORT 'NORTH' MAJOR DEVELOPMENT PLAN (MDP) SUBMISSION GUIDE **(DUE 2 MAR 2023)**

By the Nature Reserves Preservation Group of Kalamunda (NRPG)

BACKGROUND ON PERTH AIRPORT OVER 20+ YEARS:

Perth Airport once contained large areas of environmental and heritage significance:

- 'Banksia Woodlands of the Swan Coastal Plain', Threatened Ecological Communities (TECs) and Matters of National Environmental Significance (MNES))
- Wetlands
- WA State recognised 'Bush Forever' sites
- Aboriginal Heritage sites such as Munday Swamp.

These were documented as 'Natural Environment Priority Zones' (and 'Conservation Precincts') in the first Perth Airport 2004 Master Plan, after Perth Airport (PAPL) was privatised and is now owned by Perth Airport Development Group. (See 2004 Master Plan map appended, Fig 15.2).

However, the weaknesses in Australia's environment laws (the EPBC Act) have allowed Perth Airport's 5-yearly Master Plans since 2004 to successively change the original 'conservation precincts' into 'development zones', using so-called 'offsets' to allow this. Furthermore many of the developments are *not aviation-related*, but for commercial use, simply to increase Perth Airport's revenue. (Ref: NRPG and UBC meetings with Board Chair and Developments managers).

The NRPG, Urban Bushland Council (UBC) and others have been trying to save these areas by submissions to the Master Plan updates, and lobbying the federal government, but with little success, except that the new parallel runway has been moved and shortened to minimise impact on Munday Swamp. We have now lost most of the original conservation areas.

This latest 'Airport North' Major Development Plan (on the south side of Kalamunda Rd - <https://www.perthairport.com.au/Home/corporate/planning-and-projects/major-development-plans>) proposes to further clear some of the last remaining bushland and wetlands, except Munday Swamp Aboriginal heritage site. See map below from Airport North MDP 'Fig 3-1 Indicative Airport North MDP Layout', showing the extent of clearing of bushland proposed. Compare this with the Google map below showing the vegetation and the two ephemeral wetlands (deep green, in the middle of the map) which will be cleared under the MDP.

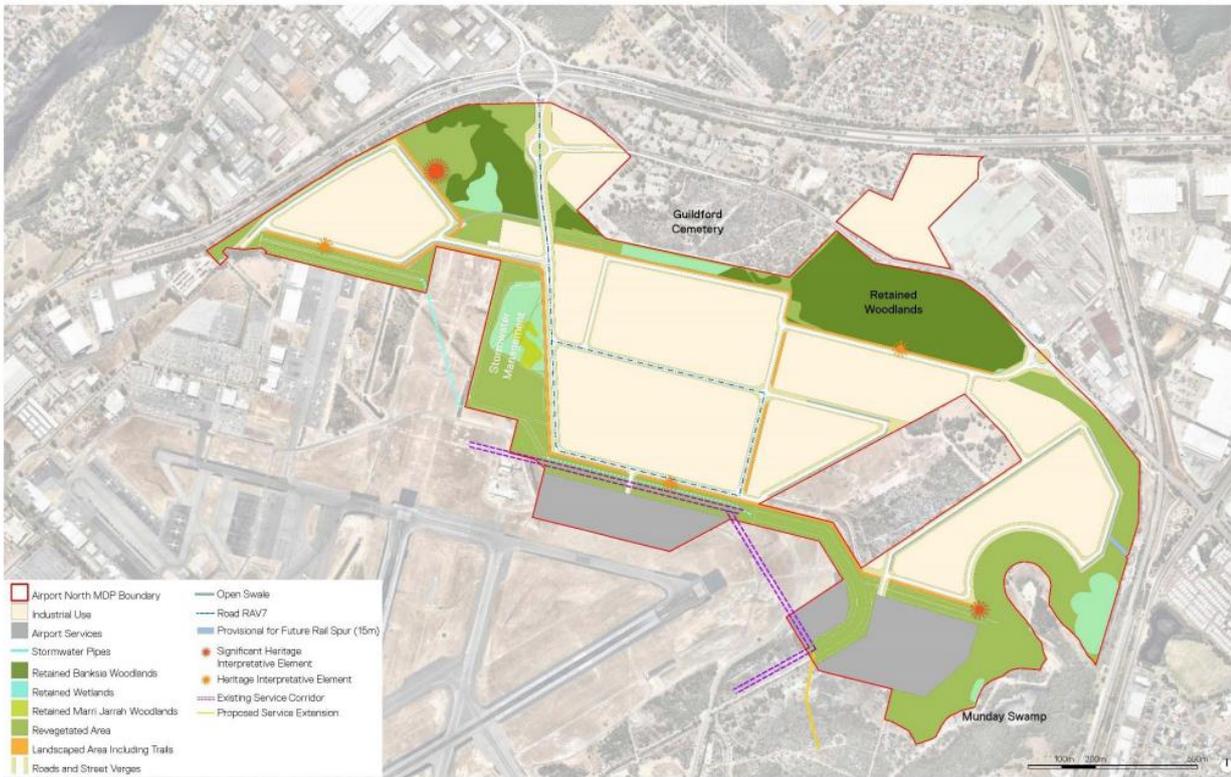
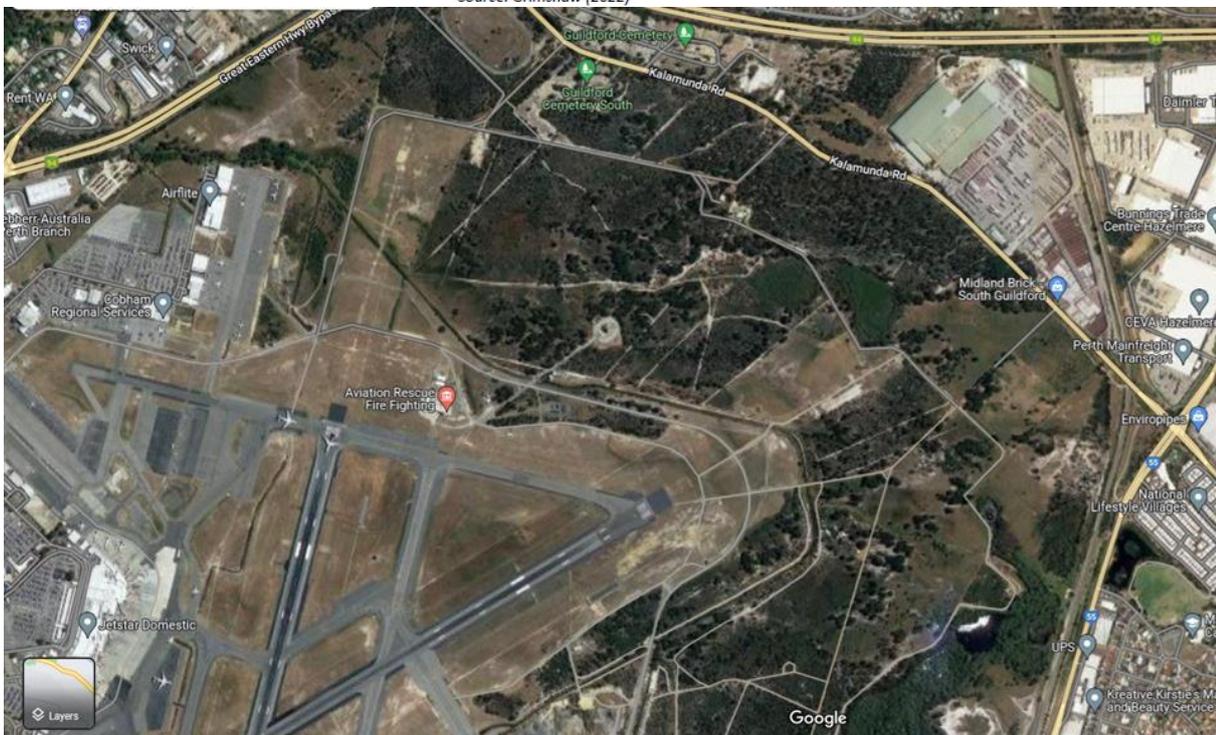


Figure 3-1 Indicative Airport North MDP Layout (subject to change)

Source: Grimshaw (2022)



The MDP does not state what is intended for the block of land on the north of Kalamunda Road, to the west of the brickworks site. That land has Banksia Woodland TEC in **Good** and **Very Good** condition, and is also **NOT** affected by dieback – another reason to have it retained. (On the south side of Kalamunda road (Fig 3-7, Area 15) is TEC of Excellent condition, but area of TEC north of the road is not designated to be retained, which is questionable).

While this has been a frustrating effort to date, Australia's change of government in 2022 has resulted in numerous promising statements from new Labor Environment Minister Plibersek on reversing environmental destruction and rebuilding Nature (Nature Positive Plan), overhauling the EPBC Act, and on 'no further extinctions'.

It is important to show strong support to save these precious environmental and heritage areas, and this is an opportune time, so please make a submission (short or long). Given the large amount of information in the MDP documents, you may like to consider using the attached 'submission guide'.

SUBMISSION GUIDE FOR ON PERTH AIRPORT (PAPL) 'AIRPORT NORTH' MDP:

The points below may be useful to help make a brief submission:

The Airport 'North MDP' proposal to clear of high conservation-value bushland and wetlands impinging on Aboriginal Heritage sites is unacceptable, given:

- It will destroy or have major local impact on the:
 - 'Banksia Woodlands of the Swan Coastal Plain', Threatened Ecological Communities (TECs) and Matters of National Environmental Significance (MNES)
 - Two ephemeral wetlands
 - WA State recognised 'Bush Forever' sites
 - 'Sense of place' of Aboriginal Heritage sites such as Munday Swamp
- It will clear vegetation which surrounds, buffers and supports these precious areas to help improve their chance for long-term survival, to avoid local extinctions.
- It will further risk the endangered Black Cockatoo which are now under additional threat to their foraging by the clearing of the Gnaragana Pine plantations.
- The very small percentages of remaining natural vegetation on the Airport estate, are already mostly below those recommended by the EPA 2001 advice, and must therefore be preserved and even rehabilitated as much as possible.
- It will fragment an already small isolated natural area, which further threatens local Extinction of this high value biodiversity area, which is also connected to an adjacent WA state-recognised Bush Forever site at Guildford Cemetery.
- The 'offsets' proposed, being in the order of 80-100km away, are not acceptable because they provide no local functionality or representation to support the remaining fragmented areas. Furthermore, all offsets effectively result in a nett loss, and 'rehabilitated area offsets' are seldom if ever able to replicate the original biodiversity of an area.
- The dire environmental situation in Australia, as documented in the State of the Environment Report 2021, compels us to change our ways and protect what is left before it is too late.
- The flaws in Australia's environment law the EPBC Act (Ref: the Independent Review Oct 2020 <https://epbcactreview.environment.gov.au/resources/final-report>), which is used to assess and approve the clearing and allow the use of offsets) means any approvals given would also be flawed, which is not acceptable.
- It is contrary to Environment Minister Plibersek's commitment to 'no new extinctions', and it should be considered that any further clearing will be contributing incrementally to extinction of the last local remnants of the unique Banksia Woodlands of the Swan Coastal Plain, wetlands and other vegetation complexes, as well as the endangered Black Cockatoos.
- It is contrary to the federal government's 'Nature Positive Plan': https://www.google.com/url?sa=t&rct=j&q=&esrc=s&source=web&cd=&ved=2ahUKEwi8-9rVlav9AhV73zgGHWv_B1IQFnoECBQQAQ&url=https%3A%2F%2Fwww.dcceew.gov.au%2Fsites%2Fdefault%2Ffiles%2Fdocuments%2Fnature-positive-plan.pdf&usg=AOvVaw2BeUBueknGdixqhdXVIPG7

No further development should be allowed on the Airport estate where it will contribute to further loss of, or threat to natural areas, their buffers, TECs and MNES, or threatened or endangered species. This is particularly relevant to non-aviation related developments. All remaining areas should be protected in-perpetuity, or at least until the end of the Airport Lease in 2096.

No further environmental assessment of this or other Airport projects, or use of 'offsets' for clearing should occur until after a full overhaul of the federal EPBC Act has been completed, after extensive scientific and environmental consultation has been completed and incorporated, so that it addresses all the issues as documented in the Independent Review of the Act . Unless this is done, it would be using flawed environmental laws, resulting in a flawed decision with irreversible consequences for our environment

Please send your submission by 2 March 2023 to:

Online: <https://www.perthairport.com.au/Home/corporate/planning-and-projects/major-development-plans/Airport%20Central%20MDP>

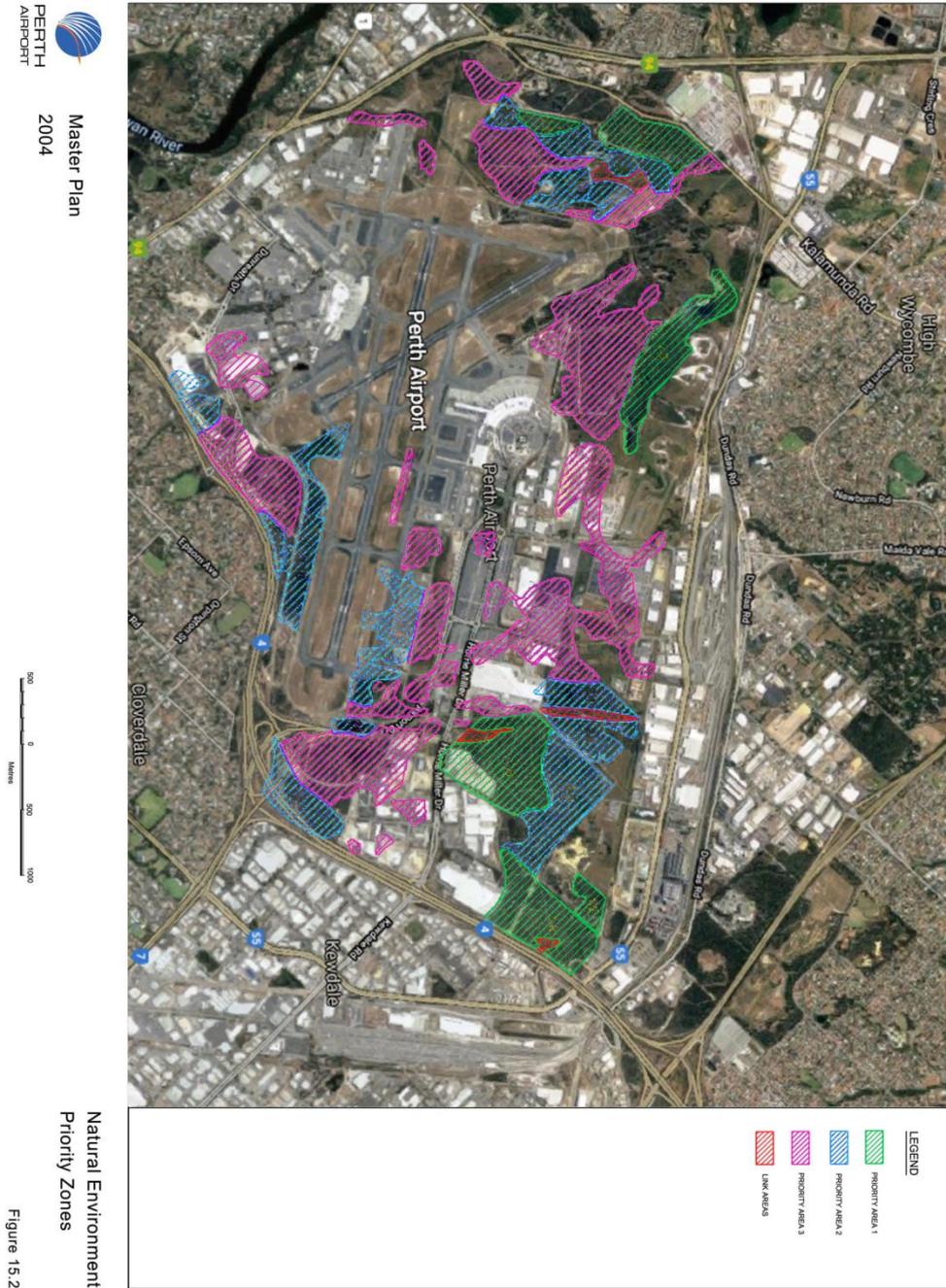
Or

By email tp: mdp@perthairport.com.au

Steve Gates
President,
NRPG Inc.

APPENDED MAPS FOR INFORMATION:

Perth Airport 2004 “Natural environmental Priority Zones” with 2020 development areas overlaid, showing extent of clearing of high value conservation areas.



Airport North MDP “Fig 3-7 Cumulative Impacts of the Airport North project”, illustrating how little of the original vegetation will be left.

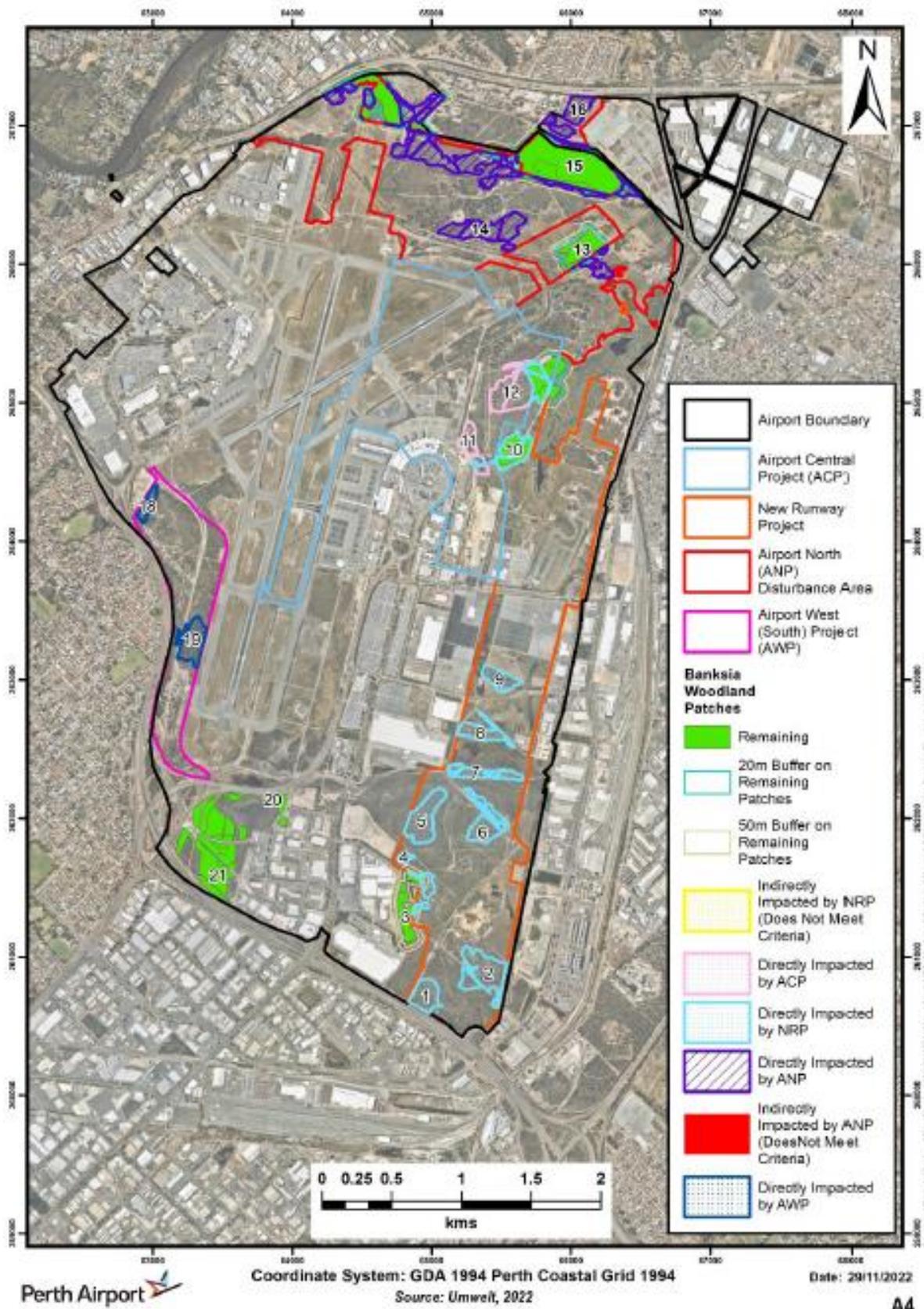


Figure 3-7 Cumulative Impacts of the Airport North project, Airport West (South), NRP and proposed Airport Central TDA to Banksia Woodlands TEC

- Map from Airport Central MDP Fig 2.1 Conservation and Special Use Areas within 15km Radius of Perth Airport” illustrating how impossible it is to find a functional nearby ‘offset’ within the vicinity of Perth Airport.

AIRPORT CENTRAL PRELIMINARY DRAFT MAJOR DEVELOPMENT PLAN - PART B, NOVEMBER 2022

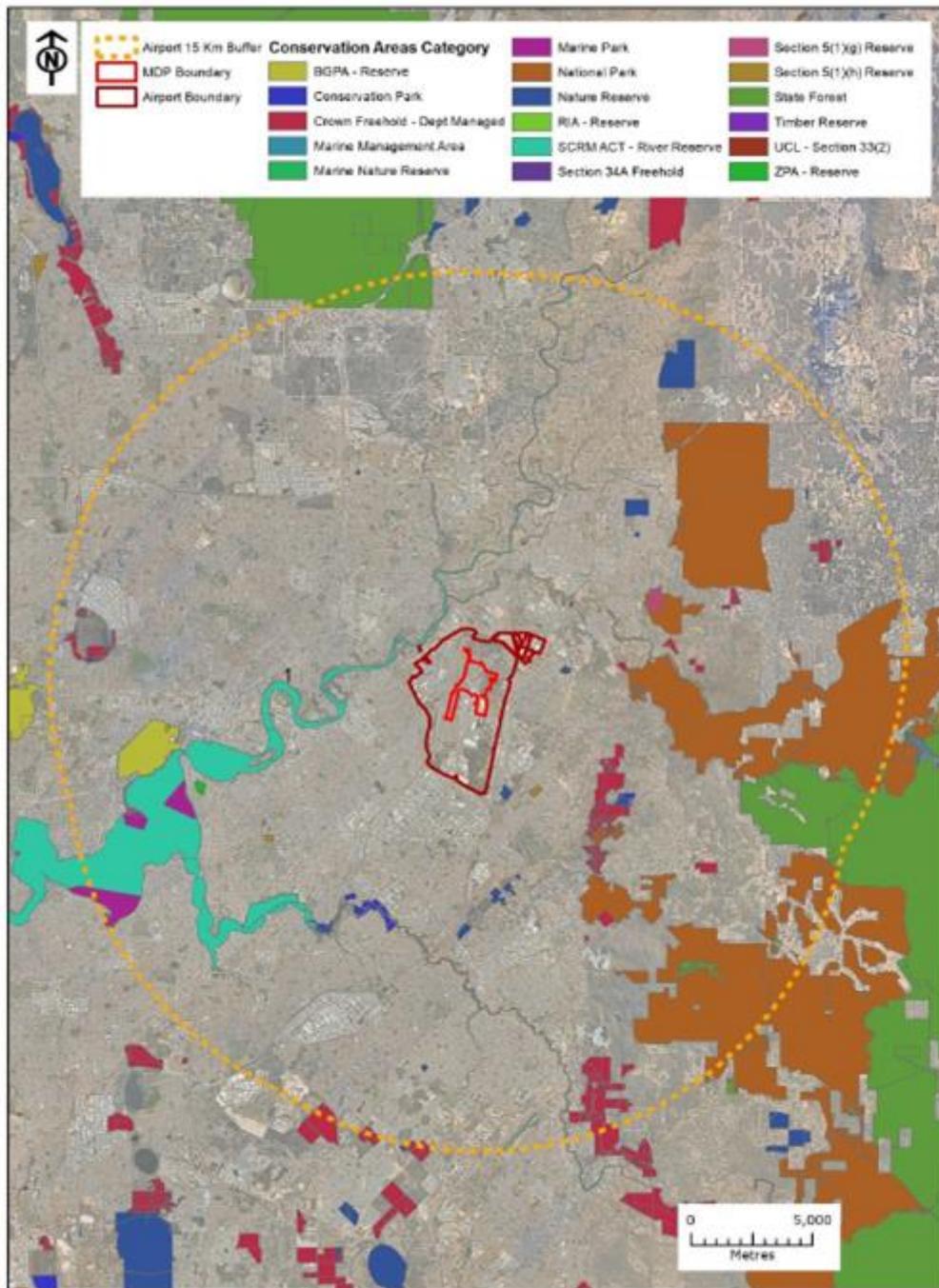


Figure 2-1 Conservation and Special Use Areas within 15km Radius of Perth Airport

Source: Perth Airport