



P.O. Box 656

Kalamunda

W.A. 6926

<http://nrpg.org.au/>

<https://www.facebook.com/KalamundaNRPG>

**Nature Reserves Preservation Group
of Kalamunda, Inc.**

30 Jan 2023

TO: mdp@perthairport.com.au
CC: kylie.calhoun@dceew.gov.au

SUBJECT: Submission on Perth Airport Central draft MDP.

This submission is made on behalf of the Nature Reserves Preservation Group of Kalamunda (NRPG), a non-profit community organisation which has worked for 30 years to preserve the natural areas in Kalamunda and surrounds. Since 2009, NRPG has made submissions on virtually all Major Development Plans for the airport estate and on the airport's Master Plans. Each submission pressed for recognition and preservation of the biodiversity values on the estate, without success.

NRPG has been represented on the Airport Consultative Environment and Sustainability Group (ACES) for more than ten years. Over that period, large areas of rich biodiversity values on the estate have been destroyed. Major Development Plan (MDP) approvals have resulted in the clearing of large areas of valuable biodiversity-rich native vegetation and the destruction of that biodiversity. Clearing included areas of Banksia Woodland of the Swan Coastal Plain, a declared Threatened Ecological Community (TEC).

The loss through this destruction, demonstrates a rapidly decreasing concern for the preservation of biodiversity on the estate. Past encouraging measures and initiatives designed to preserve the environmental values of the estate, (e.g. the Airport Environment Strategy (AES) 2009 – 2014), were 'sidelined' when the Strategy (once a stand-alone document), was incorporated ('buried') within the Master Plan (2014-2019).

The AES was a comprehensive, stand-alone document, separate from the Master Plan and was welcomed by NRPG, encouraged by the general tone of the Strategy's executive summary and with the extent and thoroughness with which the Strategy appeared to address many NRPG concerns.

The Strategy's incorporation in the Master Plan saw **Conservation Precincts** (previously considered an essential part of the estate worthy of preservation, having benefitted from projects carried out by dedicated environmental staff), absorbed into: *"redefined precinct boundaries on the airport estate. Conservation will now be a land use in each of the five airport precincts..."* (Perth Airport response to NRPB Master Plan submission, 6 March 2015).

The original **Conservation Precincts** included **"85% of the bushland assessed to be of highest conservation value..."** and the then Environment Minister Ian Campbell was **"concerned to see those areas with significant environmental values protected."** (2005 response from Environment Minister Ian Campbell, in response to NRPB correspondence). This concern rapidly evaporated in the push to increase revenue for Perth Airport Development Group (PADG).

In 2013, the MDP for the *'Clearing of southern aviation support precinct and construction of taxiway Charlie extension'* covered an area of 49.4 ha, of which 30.9 ha supported vegetation definable as a vegetation community. Clearing this vegetation was justified on the basis that ***"flora and vegetation values proposed for clearing are well-represented within the Perth Airport Conservation Precincts 5 and 7."*** With the proposed Airport North MDP, such justification would no longer be valid and would highlight the increasing value of **ALL** remaining environmental assets on the estate.

In NRPB's review of this document, Environment Minister Plibersek's 'Foreward' in the Dec 2022 "Nature Positive Plan" has been a key guideline:

'In October 2020, Professor Graeme Samuel AC submitted his independent review into the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). His review concluded that the EPBC Act, Australia's central piece of national environmental law, is outdated, ineffective, and requires fundamental reform.

When read alongside the 2021 State of the Environment Report, Professor Samuel's report presents us with an alarming story of environmental decline. Australia's natural environment is deteriorating and it's not resilient enough to withstand current or emerging threats. Native species extinction, habitat loss and cultural heritage destruction are all accelerating, and reform is urgently needed."

It is a concern to NRPB that the task of reading through more than 400 pages of this MDP (noting that *"...both reports should be read together..."*), may serve as a deterrent for members of the public, particularly given the timeframe over the year-end holiday period. Past experience and the seemingly pointless task of addressing all points of concern in this lengthy MDP, means **this submission will provide mostly only broad comments, on sections of major concern in Part B, in hope of lessening the biodiversity losses incurred.**

Part A

1 Introduction

“The airport is a vital link in the Western Australian resources sector supply chain ... Non-aviation development located on the airport estate assists in the facilitation of this supply chain, in addition to the creation of employment and economic benefits for the region.”

Yet again, we have the “resources sector supply chain ... employment and economic benefits” as justification for “non-aviation development” and for the destruction of environmental values on the estate. Whilst the Master Plan 2020 purports to strike “a **balance** between economic development, environmental management and sustainability.” Economic development will always it seems, triumph over retention of the natural biodiversity on the estate.

3.2 Accommodating Growth

“International passengers are forecast to increase by an average of 4.3 per cent per annum over the next 10 years (from pre-pandemic levels)...”

This statement implies an exponential growth in passenger numbers, however Figure 3-1 shows a linear growth. The discrepancy between these will be large and significantly affect the justification for this expansion, so it requires clarification. Further, there does not appear to be any mention of ‘FIFO’ worker impact on the number of passengers, as it is quite possible that this may decline given the major push toward remote control and automation of mining activities, which generally require FIFOs.

3.6 Support for Current State Planning Objectives and Development Strategies

“In addition to support for long term planning objectives, the proposed MDP works are complimentary to current State Government objectives...”

This is misleading because the list of objectives fails to reference the West Australian Planning Commission “Bush Forever Sites” which were established specifically to save these valuable areas, but which this and prior MDPs have failed to support, by systematically destroying them over the years since the airport was privatised.

Further, the encroachment of the new runway project and these associated new parking areas for aircraft into the immediate vicinity of Munday Swamp will destroy the ‘sense of place’ of this Aboriginal heritage site.

This comment also applies to Section 6 “Consistency with State and Local Planning” under “State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region”

4.5 Design Elements “Environmentally Sustainable Design”, and 4.6 Services

“Energy – source, use, efficiency, renewable options” and “Water – source and efficient use, recycling options”

Renewable energy is mentioned in Environmentally Sustainable Design, but omitted in “Power” under Section 4.6 Design Services. How will renewable energy be integrated into the development? It must not result in landclearing or damaging other natural locations on the airport.

What environmentally sustainable ‘water options’ will be integrated?

10.3 Bird and Animal Hazard Management

“The overall design of the development will consider best practice techniques of minimising access for birds and animals, including the use of bird spikes and netting where appropriate.”

NRPG has a strong concern that when ‘aviation safety’ is threatened by native birds and animals, they are likely to be sacrificed, to the detriment of the Environment, in a time the Federal government has acknowledged the Environment is in a dire state of decline already. Will it be assured that PAPL can resolve this issue without further damage to our Environment?

10.4 Lighting in the Vicinity of the Aerodrome

Lighting should have minimal spillage into environmental areas of the airport and surrounds, and dimmed or turned off when not required. LEDs with characteristic directional beam and being easily dimmable, along with very high cycle life, are well suited for this.

11.5 Part 13 Permit Under the EPBC Act

“The Part 13 process will be completed in parallel to the public comment and approvals process of this MDP.”

The NRPG has raised serious concerns regarding the clearing already done in past MDPs approved under the EPBC Act, which has been shown to be seriously flawed and in need of major overhaul. The NRPG maintains that no further evaluation of ‘offsets’ or clearing permits should be allowed until after the EPBC Act has been overhauled. See NRPG comment under Part B, 1.2 Approval Process.

12.1 Stakeholder Consultation

“Perth Airport is committed to effective and transparent engagement and employs a range of ongoing consultation and education mechanisms...”

NRPG does not believe that our involvement with the Perth Airport Consultative and Environmental and Sustainability (ACES) group (over many years) has been successful in reducing the impact of Perth Airport clearing of native vegetation (with the exception of Munday Swamp). This is because PAPL has a mandate to maximise the productivity of the estate, and the failures of the EPBC Act have allowed this to occur despite the high conservation values of these areas, including Threatened Ecological Communities (TEC's) involving Matters of National Environmental Significance (MNES) and State Bush Forever sites. This is particularly concerning as much clearing is for non-aviation related developments, simply in pursuit of revenue at the expense of irreplaceable 'key environmental assets'. NRPG has raised this issue with the federal government over many years, and recently July 2022 with Minister Plibersek, stating that NRPG believes no further clearing should be allowed until the EPBC Act has been fully overhauled to address the serious issues raised in the Graeme Samuels Interim Report on the Act.

Part B

1.2 Approval Process

“The EPBC Act also confers jurisdiction over actions that have the potential to make a significant impact on the environment where the actions affect, or are taken on, Commonwealth land ...”.

The EPBC Act is seen as flawed, ineffective and in requires fundamental reform, as confirmed by the Independent Review of the EPBC Act (<https://epbcactreview.environment.gov.au/>). The need for a substantial re-write of the Act was supported by the April 2019 Senate enquiry into faunal extinctions, which found inter alia, *“...serious questions about whether the EPBC Act is still fit for purpose and is in fact achieving [its] objectives.”* Given the dominant role of the Act in relation to MDPs on Commonwealth land and the fact that the review process for the EPBC Act is under way, **this MDP should be delayed until such time as the Act “is fit for purpose and ... achieving [its] objectives”.**

1.3.2 Impact Assessment Project Area

“The development of the Airport Central area will be designed to minimise its environmental footprint ... up to 42.37 hectares of native vegetation are proposed to be cleared for aviation development and to satisfy necessary aviation regulations.”

Given the aviation operational requirements to ensure safe operations (including those related to the New Runway Project, taxiway and apron developments and relocation of nav aids), it is clear that there is little hope of minimising the environmental footprint. However the area consumed by aircraft parking is subject to the assumed growth (Section 3.2) which is questionable per NRPNG comments in Part A, Section 3.2 Accommodating Growth. It appears the initial ‘design’ was based on the above operational requirements, the natural environment taking a back seat until this later stage.

2.3 Flora and Vegetation

“10.24 hectares (ha) of the Commonwealth-listed Threatened Ecological Community (TEC), Banksia woodlands of the Swan Coastal Plain, will require removal”

As NRPNG understands, the remaining area of Banksia Woodlands of the Swan Coastal Plain (TEC) are dwindling from pre-settlement area, we cannot afford to lose more of this.

“Approximately 65 ha of Bush Forever Site 386, of which 27.3 ha is already cleared, will require removal”

This contravenes the WAPC policy to preserve ‘Bush Forever’ sites.

*“Approximately 49 ha of the vegetation within the project area is infested with *Phytophthora cinnamomi* (Dieback)”*

'Infested' implies a very degraded state, and although this will not support Banksia and some other susceptible species, it is still viable for most native species and could be rehabilitated if it were not to be cleared.

2.5 Conservation and Special Use Areas

“Figure 2-1 shows Conservation and Special Use Areas within a 15km radius of the Perth Airport. No Conservation or Special Use Areas are expected to be impacted by the proposed Airport Central project.”

This large '15km radius' confirms the value of preserving the native vegetation on the airport estate, as there is little representation nearby. It is one of the last remnants in the area and should be preserved.

2.6 Heritage Places and Items

“Advice from both the DPLH and Traditional Custodians has confirmed that the site does not extend into the project area.”

What are the references to this?

How well does the aboriginal consultation group represent the local indigenous community?

How can we be assured that requests and advice given by the Traditional Custodians has actually been heeded and incorporated?

(NRPG's experience of involvement with the PAPL ACES group shows that PAPL often does not consider participants' inputs to be worth serious consideration, rather it has been more of a forum of updates by PAPL rather than 'consultation' with intent to take on board the group's feedback. Therefore it cannot be assumed that participants in the group necessarily endorse PAPL's plans.)

Figure 3.3 Vegetation condition recorded in the Project Area

This Figure would be more useful if it was shown with an overlay of the actual areas to be cleared, rather than just the areas to be affected by the MDP.

3.5.1 Banksia Woodlands of the Swan Coastal Plain.

“Surveys conducted within the project area and broader Perth Airport estate indicate the presence of the Commonwealth-listed Banksia Woodlands of the Swan Coastal Plain (Banksia Woodlands) TEC within the Airport Central MDP area.”

This MDP, 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 Threatened Ecological Community (TEC). The federal listing of the Banksia Woodland of the Swan Coastal Plain in 2016, gave some hope that an earlier prediction of the *“total destruction or near destruction plus degradation of the remnants”* (Burbidge 1989) of this community would prove unfounded. Unfortunately, the listing has done little to lessen the threat to this community.

3.5.3 Bush Forever Areas

“Remnant vegetation within the airport estate has previously been identified as an area of regionally significant bushland through the Government of Western Australia’s Bush Forever project (Bush Forever Site 386), noting that Bush Forever is a State designation and is not applicable to Commonwealth land. The Perth Airport and adjacent bushland site was “subject to endorsed Master Plan” (WAPC 2000).

Perth Airport Master Plan 2020 referred to the removal of the Bush Forever designation for *“approximately 226ha of already cleared areas (such as buildings, roads and runways)...areas that have been previously cleared through State and Federal approvals”*

“State Planning Policy 2.8 – Bushland Policy for the Perth Metropolitan Region, identifies Bush Forever sites on the airport estate. This State policy does not directly relate to the activities on the estate and the Department of Planning Lands and Heritage (DPLH) has recently proposed to remove significant portions of Bush Forever from the estate.”

This alarming statement prompted questions to DPLH, regarding the extent of and reason for such a proposed action. The relevant sections of that response follow:

“The Western Australian Planning Commission (WAPC) has initiated the attached amendment to the Bush Forever boundary, generally within Perth Airport, which proposes to remove the designation of Bush Forever for approximately 226ha of already cleared areas (such as buildings, road and runways)... The recommendations of the WAPC are to be considered by the Minister in due course. Further, I note that the proposal to remove Bush Forever was only over areas that have been previously cleared through State and Federal approvals.” The ineffectiveness of State and Commonwealth ‘protection’ measures has already been illustrated. The last section of the response illustrates the danger of permitting Bush Forever sites to degrade, as has happened under the current stewardship of Perth Airport and PADG and demonstrates the irrelevance of the State legislation.

3.7 Dieback and Weeds

“Potential Dieback impacts are most likely associated with clearing and soil movement activities during the construction phase of the Airport Central project.”

Given the above statement, it will be essential that, should approval be granted, all care be taken to prevent the spread of the Dieback pathogen and invasive weeds. This will require constant monitoring during all phases of the plan. Whilst awaiting approval, ongoing dieback mapping and monitoring should be carried out and both CEMP and OEMP modified if required.

3.8 Banksia Woodlands TEC Impact Assessment

“Pristine patches of Banksia Woodland TEC with no obvious signs of disturbance and zero (or almost absent) weeds were not recorded in the airport estate (Umwelt 2022).”

This is hardly surprising, given Perth Airport’s increasing reluctance to take steps to preserve this and other biodiversity assets on the estate, preferring instead to make full use of the flawed Environmental Offsets Policy and its guidelines. The failure to adequately maintain areas of this bushland, has led to it degrading to its current state over decades.

3.8.3 Indirect and Offsite Impacts and Associated Avoidance/Mitigation Measures

“Following clearing of 7.25 ha of Patch 12 for the Airport Central TDA, 2.46 ha Patch 12 (see Figure 5-3) of the patch will remain adjacent to the Airport Central TDA.”

Whilst the proposed **offsets** will be addressed later, this loss of ‘small’ areas of the community is indicative of the cumulative effect of ‘death by a thousand cuts’ applied to the natural assets remaining on the estate.

Table 3-7 Area of former Banksia Woodland TEC within the Airport Central TDA indirectly impacted by the NRP

“Comment No potential impact as the 0.22 ha area has approved clearing under the NRP Project.”

The relevance of this comment is obscure. We now have the New Runway Project MDP in the mix. It is highly likely the “*approved clearing*” was considered in isolation in the 2018 New Runway Project MDP, treated as the only MDP of relevance. We now seem to be introducing **selected** MDP clearing figures into the statistical analysis – to what end?

3.8.4 Significance of Residual Impacts

“Cumulatively the Airport Central TDA, Airport West (South) project, NRP and future Airport North TDA potentially trigger four of the seven significant impact criteria (see Table 3-8). Together they potentially impact on 90.70 ha of Banksia Woodland TEC, representing 62.71 % of the occurrence in the airport estate, this is significant at the local scale.”

Whilst it appears that the cumulative losses are now considered in this MDP, the conflation of these plans (involving three MDPs and ignoring at least two earlier MDPs), makes interpretation difficult. The total impact figures for the estate are however, deemed “*significant at the local scale*” only. As in other MDPs, the case now concludes that:

“the potential impacts on the Banksia Woodland TEC are not considered significant with respect to the survival of the ecological community across its range.”

This is reminiscent of the statement in the New Runway Project:

“...the area of Banksia Woodlands remaining on the Swan Coastal Plain is believed to be around 336,000 – 337,000 hectares. The total area of 43.66 hectares to be cleared for the NRP represents 0.013 per cent of the remaining Banksia Woodlands TEC. Therefore it is highly unlikely the clearing for the NRP will adversely affect the survival or recovery in nature of Banksia Woodlands or its conservation status”

Whilst this conclusion (quantified by the vague term “*highly unlikely*”), follows conservation advice and may be statistically valid, its practical validity is debatable. The question is, to what percentage must the TEC decline before such clearing ceases? It is considered (EPA 2000) that remnant vegetation of less than 30%, and fragmented (such as these TECs) is at high risk of decline to extinction. To allow further clearing is in conflict with Environment Minister Plibersek’s 2022 commitment to ‘no new extinctions’ and to rebuild Nature.

3.8.6 Offsets

The Offset Policy and guidelines are basically flawed, since a net loss of the values being offset always results. See later comments on Section 12, Draft Airport Central Offset Proposal.

3.10 State Listed Priority Flora Impact Assessment

It seems odd that this section is so comprehensive and detailed, particularly since “*As there are no significant impacts to State listed Priority Flora no offset is proposed.*” (3.10.5 Offsets). The following, taken from the Airport West Project, Flora and Vegetation Impact assessment (2.2 Other Legislation and Guidelines, 2020), suggests this may be no more than a very thorough, ‘ticking the box’ exercise.

“Perth Airport is not required to seek approvals, nor obtain offsets, under State and local legislation for impacts on flora and vegetation. However, as required under the EPBC Act, State and local matters, such as listed species and communities, are considered and given due regard to inform the significance of the environmental values being impacted. Therefore, State legislation and associated policy framework are described for context and to inform the overall environmental values on the Airport estate.”

3.10.2 Direct and Indirect Impacts and Associated Avoidance/Mitigation Measures

“Regionally the available abundance data were limited for all Priority Flora species with most locations having little abundance data. The number of reported locations/populations has therefore been used to assess the significance of the potential impact to the Priority Flora, at the regional scale.”

Surely, the paucity of regional abundance data, with the resultant change in significance criteria, detracts from the determination that potential and cumulative impacts for all Priority Flora are deemed “not significant.” And that “no offset is proposed.”?

3.11 Native Vegetation Impact Assessment

See earlier comments at section 1.3.2 Further comments will be included in section 10 Whole of Environment on Commonwealth Land.

Table 3-17 Severity of potential impacts of the Airport Central TDA on remnant native vegetation and associated avoidance or mitigation measures

What will be the impact of cumulative Groundwater hydrological changes on Munday Swamp, by the MDPs?

3.11.4 Significance of Residual Impacts

“At the local scale the Airport Central project potentially reduces the extent of remnant native vegetation from 23.26% to 21.26 % of the Perth Airport estate, this is unlikely significant at the local scale. At the regional scale the current extent of the Bassendean associations are below the threshold of 30% of pre-clearing extent which the EPA (2000) considers species loss appears to accelerate.

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: this is above the 10% level representing “endangered” (EPA, 2000). In this context, the impact of the Airport Central TDA on remnant vegetation at the regional scale does not currently constitute a significant impact to remnant vegetation.

The potential impacts of the Airport Central TDA remnant vegetation as a whole are therefore not likely to be significant at the local or regional scale (Umwelt 2022)”

The claimed justification that the impacts of Airport Central TDA on remnant vegetation are ‘not likely to be significant’ is inconsistent with the commitment to restore and rebuild Nature, by Minister Plibersek in 2022, as well as the EPA 2000 position that less than 30% remnant is the threshold for exponential decline. How is this to be reconciled?

3.11.5 Cumulative Impacts to Remnant Vegetation, Table 3-19 The potential cumulative impacts of the Airport Central TDA (AC TDA), Airport West (South) project (AWP), NRP and Airport North TDA (AN TDA), on the area of Remnant Native Vegetation

“At the local scale, the cumulative impacts of the Airport Central TDA, Airport West (South), NRP and future Airport North TDA potentially reduces the extent of remnant native vegetation from 23.26% to 7.92% of the Perth Airport estate which is likely significant at the local scale.

The potential cumulative impacts of the proposed projects on the extent of Bassendean Associations are summarised in Table 3-20. The cumulative impacts of the Airport Central TDA, Airport North TDA, Airport West (South) Project, and the NRP potentially reduces the extent of Bassendean 1001 and 1018 to 21.14% and 12.60%, respectively of the pre-European extent: This is above the 10% level representing “endangered” (EPA 2000). In this context, the cumulative impact of the Airport Central, Airport North TDA, Airport West (South) Project, and the NRP on remnant vegetation at the regional scale will contribute to the decline of vegetation of the Bassendean 1001 and 1018 Associations toward the 10% endangered threshold, however, is unlikely to be significant.”

As per comment at 3.11.4, how can this further destruction of native vegetation that is already below a level of exponential decline (EPA 2000) be justified?

3.11.5 Offsets

“The potential impacts of the Airport Central TDA remnant vegetation as a whole are unlikely to be significant at the local or regional scale.”

As per 3.11.4, 3.11.5 how can this claim be justified? At this low level of remnants, every further small loss is significant. This claim is completely contradictory to the known science of exponential decline to extinction. (EPA 2000)

4 Fauna

4.4 Impact Assessment Process

Table 4-3 Major development projects proposed for the Perth Airport estate

Having the cumulative loss figures for existing and planned developments available is a welcome step. The Fauna Habitat Loss figures however, are of great concern. Habitat on the estate, the metropolitan area and the Swan Coastal Plain is disappearing at an increasing rate and, notwithstanding the obvious thoroughness of consultant surveys, the figures leave little hope for the future of such habitat. The smaller, **25%** loss within Airport Central, is a reflection of little habitat remaining within MDP area, as a result of previous clearing and neglect of once valuable areas of biodiversity. The cumulative total loss figure of **67%** is a major telling point and

issue, particularly since further losses are increasing with each new development on the estate, within the Metropolitan area and State-wide.

Table 4-4 Composition of vertebrate fauna assemblage of the Perth Airport estate

This table clearly shows that of the 144 recorded species, 22 are now locally extinct. How can it be justified that further cumulative clearing does not violate the commitment by Environment Minister Plibersek that no new extinctions will be allowed to occur?

4.7 Carnaby's Black Cockatoo Impact Assessment

In previous submissions, NRPG has expressed its growing concern for the loss of endangered-Cockatoo habitat on the estate. In the past, this concern has been addressed by Perth Airport, in the following statement: *"The Cockatoo habitat types proposed to be cleared are well represented within the Conservation Precincts on the estate, therefore the impact of clearing the Black Cockatoo foraging habitat will be mitigated by ongoing management of the values of the Conservation Precincts. PAPT will continue to rehabilitate and maintain the flora and vegetation values of Conservation Precincts 5 and 7 where Black Cockatoo habitat has been identified."* (Draft MDP, Clearing of Southern Aviation Support Precinct and construction of Taxiway Charlie extension. March 2013). With the loss of Conservation Precinct status this argument is no longer valid and, therefore cannot be used.

The New Runway Project MDP also addressed, in uncompromising terms, the 'problem' of the Black Cockatoo population and the safety of the flying public:

"Black cockatoo habitat is, by its nature, considered generally inconsistent with the safe operations of an airport. Bird strikes present a critical risk to aircraft and passenger safety, in addition to the risks to the surrounding community. To that end, Perth Airport propose that the protection of avifauna habitat is best served through offsite environmental offsets and protection."

It must also be acknowledged that the Cockatoo is now under even further threat with the clearing of foraging sources at the Gnangara pine plantation.

4.7.3 Indirect and Offsite Impacts and Associated Avoidance/Mitigation Measures

Table 4.9 Proposed Avoidance/Mitigation Measure column include:

- *"Retain gardens and verges (where practical).*
- *Landscape planting foraging species suitable for Carnaby's Black-Cockatoo.*
- *Replant degraded areas."*

This is a complete contradiction from previous thinking cited above (without explanation) and should be treated with suspicion, given Perth Airport's previous strenuous opposition to the existence of Black Cockatoo habitat on the estate, quoted above.

Table 4-10 Assessment of significance of residual impacts to Carnaby's black cockatoo

Significant Impact Guidelines 1.1 criteria column

“Lead to a long-term decrease in the size of a population (or an important population).”

Likelihood and rationale column

“Likely to occur ... It is uncertain if this represents a decline in an important population, but there will be a decline in the number of the species, or their period of occupancy, at a regional level (12 km)”

“Modify, destroy, remove ... to the extent that the species is likely to decline.”

“Unlikely to occur... offsets through rehabilitation within the Perth Region are proposed to ensure there will be no overall loss of foraging habitat.”

The uncertainty surrounding the future of the Carnaby's Black Cockatoo population should urge caution in the removal of **any** foraging species. The largest threat is acknowledged to be loss of habitat. The results of community-based surveys such as the Great Cocky Count, give an estimated population decline of 15% per year on the Swan Coastal Plain alone. Coupled with the clearing of approximately 87% of their habitat in the Wheatbelt since 1950s, the importance of such habitat is increasing. The fallacy of offsets ensuring “no overall loss of foraging habitat” will be addressed at sections 12.4 and 12.5.

4.7.4 Significance of Residual Impacts

“The loss of foraging habitat could alter the local distribution of the species and reduce its abundance at the regional level, but is not expected to have a significant impact at the species scale. This impact can be considered to be moderate at the level of the surrounding airport estate, and minor in the regional context (within 12km).”

See above comments.

4.7.5 Cumulative Impacts

“Cumulative impacts of known proposed projects at Perth Airport (see Table 4-3) to Carnaby's Black-Cockatoo are expected at the local- (major impact within the airport estate) and regional- (moderate impact within 12 km) scales but these are not expected to be significant at the species-scale (effectively no population decline across the species' range with, at most, a few individuals impacted and any decline in population size within the normal range of annual variability).”

See earlier comments on Table 4.10

4.7.6 Offsets / Anticipated outcome

“The proposed action will result in some residual impact to the Carnaby’s Black-Cockatoo ... This impact is unavoidable due to the removal of vegetation and subsequent development and represents virtually all foraging and potential nesting habitat within the project area ... area. Section 12.4 outlines the offset proposed to address the significant residual impact to 49.24 ha of Carnaby’s Black-Cockatoo habitat.”

The adoption of such offsets will be addressed at sections 12.4 Proposed Offset Measures and 12.5 Proposed Offset Sites.

4.8 Baudin's Cockatoo Impact Assessment

“...However, recent surveys suggest that the species may forage within the project area and in the northern area of the estate more often than previously thought, but it is still likely to be an irregular visitor.”

The possibility that Baudin’s may forage on the estate more often than previously thought, is a revelation, but probably even more likely now with clearing occurring at the Gnangara Pine plantations. Most concerns over Carnaby’s Black Cockatoo future however, apply equally to the future of Baudin’s Cockatoo. See comments above.

4.8.5 Cumulative Impacts and 4.8.6 Offsets/Anticipated Outcome

“The development of the four project areas listed in Table 4-3 will result in the cumulative total loss of 196.35 ha of foraging habitat for Baudin’s Black-Cockatoo, see Table 4-11.”

“Cumulative impacts of known proposed projects at Perth Airport (see Table 4-3) to Baudin’s Black-Cockatoo are expected at the local- (major impact within the airport estate) and regional- (moderate impact within 12 km) scales but these are not expected to be significant at the species-scale.”

How can be claimed to be ‘insignificant’ that so much cumulative loss of foraging habitat is acceptable for a bird species which is endangered, as well as a decline in native vegetation, both of which are on a trajectory to extinction? This is the same justification used in the past which has resulted in the present dire condition of our Environment - a ‘death by a thousand cuts’. How can this be reconciled against the federal government’s 2022 commitment to ‘no new extinctions’, and to ‘rebuild Nature’?

4.9 Forest Red-Tailed Black-Cockatoo Impact Assessment

4.9.5 Cumulative Impacts

Listed as 'Vulnerable' by both State and Federal governments, faced with loss of habitat through clearing for development and declining numbers of young birds through bushfires and Raven attacks, most comments made on the plight of Carnaby's Black Cockatoo apply here.

4.14 Fauna Summary

"The main impacting process of concern is habitat loss causing population decline ... Within the Airport Central area and the airport estate more broadly, revegetation and weed management, development of 'fauna friendly' gardens and/or landscapes, the current 'Living Streams' program and feral species control will assist in the retention of biodiversity values."

Despite Perth Airport's earlier concern that:

*"Black cockatoo habitat is, by its nature, considered generally inconsistent with the safe operations of an airport. Bird strikes present a critical risk to aircraft and passenger safety, in addition to the risks to the surrounding community. To that end, **Perth Airport propose that the protection of avifauna habitat is best served through offsite environmental offsets and protection**"*

Welcome measures are proposed to help retain biodiversity values. The execution of these measures will need careful monitoring, to ensure they are carried out. It remains to be seen which of these conflicting views prevail in the final draft of the MDP.

"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)."

The same comments made above apply here.

It is imperative that continued incremental destruction be stopped and the decline reversed. The proposed use of offsets is problematic as there are little to no suitable areas within close proximity which can provide the same functions as the areas proposed to be destroyed.

Table 4-30 Summary of the Cumulative Loss to Regularly Present CSF

Despite the 'moderate' regional area loss rating, the loss figures for the three cockatoo species are significant, concerning and already, at the Perth Airport estate level, "major". Given the omission of several factors from the discussion (including the long-term effects of a rapidly changing climate), 'moderate' ratings are highly likely to prove over-optimistic. Comments above are also applicable to this summary.

5.4 Contaminated Land

5.4.1 Per- and poly-fluoroalkyl substances (PFAS) Overview

This is the main contaminant concern for this MDP and will also be a concern for the Airport North MDP. Whilst NRPG shares the general concerns over the long-term effects of such pollution, it appears Perth Airport staff are well-aware of the problem and undertaking measures to reduce its impact on the estate and its environs. The CEMP, Construction Environmental Management Plan and the PFAS Management Plan (when completed) will be a vital part of these measures and on-going monitoring will be required during and following both proposed developments.

What is the timeframe for these to be completed and implemented?

6.2.1.1 Stormwater Design Criteria

"This will help to ensure that Perth Airport does not increase the risk of flooding downstream of the estate boundary due to any aeronautical or non-aeronautical developments being undertaken."

Minimising the impervious surface areas by eliminating non-aeronautical developments, and the use of permeable-type surfaces/paving would avoid exacerbating this problem, particularly in light of higher-intensity precipitation events as our climate changes.

Detention basins on the airport estate are required to drain within a 48 hour period to limit the attraction of birds.

Rapid drainage of stormwater would exacerbate the problem of loss of groundwater, so it is important that 'living streams' will be constructed to retain the

water and allow it to recharge the local groundwater to minimise the impact on the present local hydrology. It would also be useful to Munday Swamp to help reduce the decline in water level in the wetland, resulting from our drying climate.

Fig 6-8 Concept Stormwater Design

The “Northern Maindrain PFAS Culvert is shown to be underground. NRPG understands this is to be ‘piped’ because it passes through the PFAS contaminated area, but would it not be possible to make this a living stream also by excavating out the contaminated soil and lining the area before filling it to recreate a riparian environment?

Fig 6-10 Example of a hydrograph generated from modelled results

The ‘Observed’ values are only shown for a very short period in one year or so, and are significantly different from the long term modelling graph, having almost as much error as the total annual min-max variation. How can we have confidence in the modelling?

Wetlands

7.5 Indirect and Offsite Impacts and Associated Avoidance/Mitigation Measures

*“Given the **general objective** to retain current wetland values within Munday Swamp, and its close proximity to Airport Central, potential indirect impacts to Munday Swamp (and a small, retained portion of Wetland 5 that directly adjoins it) are considered in this section.”*

NRPG is concerned over the loss of any wetlands on the estate and has addressed those concerns in past submissions.

A major concern has always been the loss of valuable habitat and biodiversity, and in this MDP:

1). Munday Swamp is a major concern, as in both the New Runway Project and Airport North MDPs. Having retention of wetland values as a “*general objective*” is not enough and should be designated a “**specific objective**”. This may already be the case however, since **7.5.1 Changes to groundwater and surface water regimes section** states: “*Perth Airport is committed to managing water levels within Munday Swamp to ensure that existing wetland values are maintained.*”

2) Figure 7.1 and Table 7-2 clearly show that wetland IDs 2,3,4, and 5 will also be mostly destroyed by this MDP, and as per prior comments this is in conflict with the Environment Minister’s 2022 commitment to prevent new extinctions (which significantly occur from incremental destruction such as this), and to rebuild Nature. Review of the draft Airport North MDP shows that the wetlands in that area are also planned to be destroyed for commercial development. This means that the

cumulative impacts of these MDPs are disastrous and cannot be allowed if the government's commitments are to be taken seriously.

7.5.4 Increased light, noise or vibration

"Noise, light and vibration as a result of Airport Central are not expected to contribute any further impacts to wetland faunal assemblages in excess of those already proposed under the New Runway Project."

How is this claim justified?

The "National Light Pollution Guidelines for Wildlife including Marine Turtles, Seabirds and Migratory Shorebirds" is an example which must be considered to determine impact and ways to prevent further detriment to the wildlife of this area. See: <https://www.dcceew.gov.au/environment/biodiversity/publications/national-light-pollution-guidelines-wildlife> and <https://www.dcceew.gov.au/environment/epbc/publications/significant-impact-guidelines-11-matters-national-environmental-significance>

7.5.6 Loss of supporting habitat

"However, a cyclone fence dug into the ground currently exists along the entire western boundary of Munday Swamp, and has been in place since 1985. As a result, turtles are currently unable to access the potential nesting areas within Airport Central from Munday Swamp. Clearing of these areas is therefore unlikely to impact on the turtle population of the Swamp by way of loss of nesting habitat."

Why is it not possible to raise the cyclone fence or otherwise modify it to allow turtles to access the potential nesting areas in Airport Central? Would this not contribute to helping these vulnerable species survive and contribute to the 2022 commitment by the Environment Minister to rebuild nature and stop new extinctions?

7.6 Significance of Residual Impacts

"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."

Refer to prior comments regarding conflict of this destruction with the Environment Minister's commitments 2022.

7.7 Cumulative Impacts and Associated Avoidance/Mitigation Measures, and Table 7-4 Known cumulative impacts to CCWs and REWs

“The potential indirect impacts to Munday Swamp resulting from the cumulative loss of surrounding wetland areas is planned to be counteracted through the provision of a Living Stream and rehabilitation of an upland buffer around Munday Swamp, which could in the long-term re-establish some ecological linkage, though not approaching the values currently provided by surrounding wetlands and habitat.”

The value of successful Living Stream projects has already been established. With lessons learned from that experience, it is likely **some** ecological linkages may eventually be re-established. Comments on measures to protect Munday Swamp values (in the **Heritage section 9**) indicate a willingness to ensure the site is protected.

Table 7-4 confirms the cumulative of 64.9% of CCWs and 74.8% of REWs on the airport will have been destroyed by just the ‘direct impacts’ of these developments. This is unacceptable given the environmental ‘crisis’ we are currently experiencing, and the commitments by the federal government to prevent and reverse the trend.

9.4.3 Indirect and Offsite Impacts and Associated Avoidance/Mitigation Measures

“Direct impacts to Munday Swamp will be avoided and considerable management procedures will be in place during the construction and operation of Airport Central to ensure indirect impacts to the site are minimised or completely avoided.”

No mention is made of the impact of the encroachment of the new runway or this MDP on the loss of ‘sense of place’ in terms of light pollution, noise, clearing of vegetation up to the edge of Munday Swamp, bird control measures and the impact this will have on mental health particularly of the Aboriginal people who have used the area. This is akin to placing an industrial development next to one’s residence or other personal space, which are considered important for well-being.

10 Whole of Environment on Commonwealth Land

Table 10-1 Assessment of Airport Central Project in relation to the Whole of the Environment

Impacts on flora and vegetation, Significance of Impacts

*“In this context, the impact of the Airport Central project on remnant vegetation at the regional scale will contribute to the decline of vegetation of the Bassendean 1001 and 1018 Associations toward the 10% endangered threshold, however, is not considered **currently** to constitute a significant impact to remnant vegetation ... and the cumulative impacts of the Airport Central TDA, Airport North TDA, Airport West (South) project, and the NRP project on remnant vegetation as a whole are therefore not considered significant.”*

This remarkable extract from the table suggests that the criteria for significant impacts need revising. Whilst the project “*is not considered **currently** to constitute a significant impact to remnant vegetation*”, at what point in the future (given the changing climate) will this point be reached? It appears that few, if any, losses achieve ‘significance’, particularly at regional level. How much vegetation loss will be needed before practical, rather than statistical ‘significance’ is achieved?

The conclusion of this extract is completely inconsistent within itself, and the EPA 2000 position which states 30% remnant is the point of accelerating decline and 10% is endangered. How can this conclusion on the cumulative impacts be justified?

Impacts on people and communities, Significance of Impacts

“The Airport Central Project is not expected to have a negative impact on people and communities outside of the Perth Airport estate for the following reasons:

- *The Airport Central Project will occur on Commonwealth land currently managed by Perth Airport. No residences or businesses will be needed to be removed to facilitate the project.”*

This first ‘reason’ reveals that it appears the only concern is for impacts on leaseholders and investors. To date, **ALL** projects on the airport estate have had a negative impact on communities within the City of Kalamunda. The continuing destruction of natural values on the estate, gradually replaced with hard standings, buildings and other heat-sink infrastructure areas, means the airport estate heats up further with every vegetation loss. In the summer weather pattern, the welcome south westerly arrives, cooling coastal areas, the city and, eventually the foothills. By the time that air mass reaches the foothills, it is significantly warmer, due in part to Perth Airport projects.

11.1 Perth Airport Environment Strategy.

See comments in the initial paragraphs of the submission, highlighting shortcomings in comparison with the Airport Environment Strategy 2009 – 2014.

12 Draft Airport Central Offset Proposal

The application of this convenient policy and its Guidelines, created, no doubt with the best of intentions, considered by NRPNG to be at best, ‘better than nothing’, cannot protect environmental assets on the estate. Its use will permit continued clearing of any valuable vegetation, be it DRF, an endangered TEC or any other matter of National Environmental Significance. Vegetation will be destroyed, past husbandry wasted, flora and fauna populations eventually eliminated and, the universal panacea for all this destruction will be, the establishment of offsets in areas outside the estate, so far away that they provide little or no local function of the areas they are supposed to replace. Whilst husbandry of such areas, if carried

out assiduously, will prevent their degradation, under the current arrangement, the biodiversity assets of the airport estate are destined for decline or extinction unless the practice of offsets is stopped. Destruction of vegetation complexes within the estate and the use of an offset (with all its failings) will ALWAYS result in a NET LOSS of that complex or community, and conflicts with the 2022 commitment by Environment Minister Plibersek to prevent new extinctions and to rebuild Nature.

This issue is one of the problems with the EPBC Act, which the Graeme Samuels Interim Review report showed has failed to protect the Environment. Environment Minister Plibersek has since committed (in 2022) to its overhaul, after extensive consultation with stakeholders.

NRPG has requested by correspondence to the Environment Minister, to stop the evaluation of development proposals and disallow any further assessment of offsets until the EPBC Act overhaul is completed.

Figure 12-1 Overview of Proposed Offsets to mitigate residual impacts of the Airport Central project

“N.B. The area required for restoration offset and direct land purchase offset will be determined once sites are finalised.”

While this figure clarifies the process, the above note suggests that there may be no further opportunity for comment on the appropriateness of the areas required once sites are finalised. If so, this is unsatisfactory, and in reference to NRPG comment on 12 above, any evaluation must be delayed until after the overhaul of the EPBC Act to address the issues raised in the Samuels report.

12.4 Proposed Offset Method

This method does not appear to include consideration for the offset site to be in reasonably close proximity to the original, and has resulted in some offsets in the past being allocated up to many kilometres away. This fails to provide the ‘local functionality’ and/or symbiotic benefits, and therefore may not be an acceptable outcome, depending on the intent of the offset. Furthermore, areas retained which are adjacent to those cleared (and offset) lose these benefits, connectivity and buffering, becoming fragmented, which puts them under further risk of decline. For example, under this MDP Munday Swamp will become increasingly isolated and distant from other native vegetation, and lose buffers along the west side.

It should also be noted that revegetated areas are seldom successful in reproducing high-quality diversity and weed-free conditions, and therefore may not be a suitable substitute for the areas they are ‘offsetting’.

The EPBC Act must be overhauled before further offsets are considered.

NRPG comments will be confined to 12.5 Proposed Offset Sites.

12.5 Proposed Offset Sites

“The final offset sites are yet to be determined pending final survey results, selection and purchase of offsets and negotiations with State Government departments for inclusion within the State conservation estate.”

Given the above, extensive comment on this section is impossible at this point. It is feared further opportunity for more detailed comment will not be provided, which would be unacceptable. Comments are therefore limited to general observations on the 6 sites. Sites 6 and 7 details in Table 12.2 giving insufficient information for comment but, seeing *“Restoration works improvement /remediation of wetlands”* is not encouraging.

Table 12-11: Maximum impact to protected matters within the Airport Central MDP area and Offset Requirement Summary.

This table has no mention of proximity or mitigation of impact on loss of connectivity for any native area which may be adjacent to the cleared area proposed to be offset. See comments on 12.4.

Offset sites

“(Site 1) is a private property of approximately 950 ha in area located within the Shire of Gingin. The property is located approximately 100 km north of the Perth Airport on the Swan Coastal Plain. The privately owned site is currently under examination with the landowner, who has indicated they are receptive to sale of the property.”

Sites 1, 2, 3 and 4, are all approximately half way to Jurien Bay, (the northern extent of the Banksia Woodlands of the Swan Coastal Plain). Given the effects of a changing climate (highlighted by the Department of Climate Change, Energy and Environment and water in 2016), surely consideration should be paid to the possibility of this northern limit moving south with those changes and such sites no longer being viable for the vegetation? These sites would fail to have any local functionality, and therefore be inappropriate.

“(Site 5) is a private property of approximately 283 ha in area located within the Shire of Murray. The property is located approximately 80 km south of the Perth Airport on the Swan Coastal Plain. The privately owned site is currently under examination with the landowner, who has indicated they are receptive to sale of the property.”

Such an offset may be more reasonable and effective, depending on the outcome of the pending spring survey. This site would fail to have any local functionality, and therefore be inappropriate.

“(Site 6) is a group of wetlands approximately 20 km south-west of the airport, within the City of Cockburn Local Government Authority (LGA). Little Rush Lake & Yangebup Lake Reserve (Figure 12-32) have been selected as an example of a

proposed Restoration offset for MDP Wetlands. In addition, Perth Airport will likely seek opportunity to provide restoration funding to additional wetlands within the LGA.

Despite the 'Restoration' label and the "inferred" values, This site may be the most valuable wetland offset, given the City of Cockburn's past environmental record. This site would fail to have any local functionality, and therefore be inappropriate.

CONCLUSION.

This Major Development Plan is the latest in a line of MDPs. 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), all claim to benefit the State and its population, whilst destroying yet more environmental values on the estate.

The MDP is therefore considered to support the State and Federal Government's investment in rail. ... The clearing and site preparation works proposed for Airport West (South) also (broadly) support other Western Australian Government objectives."

Airport Central will shortly be followed by Airport North – no doubt making similar, rather vague, unsubstantiated claims. It appears that public comment made in submissions, neither modifies an MDP, nor reduces the resulting environmental damage. Addressing each point of concern within an MDP (as NRPG has done in the past), appears a pointless exercise – a waste of time and effort. Environmental staff at the airport, though diligent in their due process, appear powerless to do more than ensure all legal requirements are complied with, including the relevant sections of a deeply flawed EPBC Act and an equally flawed Offsets policy and guidelines. Despite its total disillusionment with the MDP public consultation process, justified below, NRPG will continue to make submissions, in the now forlorn hope that PADG will make greater efforts to preserve biodiversity on the estate.

The continuing failure of Perth Airport to protect the environmental assets on its estate and to ignore previous statements, is highlighted and supported by the following facts:

- **Perth Airport Annual Environmental Report 2009/2010**, described the environmental assets of the estate as follows:

*"The Perth Airport Estate contains a number of areas of high quality bushland. These areas have been reserved in 306 hectares of two conservation precincts and a further 39 hectares as an infrastructure/conservation zone. **WAC acknowledges that these areas are regionally significant and that their proper management is important to all stakeholders.**"*

The 2014 Master Plan saw the disappearance of these two conservation precincts. Precinct 7 was absorbed into Airport North and Precinct 5 into Airport South. This dramatically changed the uses permitted in these precincts, a move destined to destroy almost all the remaining biodiversity values of both precincts. Now they could no longer be used as appropriate on-site offsets.

- *"A key initiative of this Strategy is to produce an ultimate development provision for environmental management at Perth Airport so **at the expiration of the lease in 2096, the estate retains the key environmental attributes existing today.**"*(Extract from 2009 – 2014 Environmental Strategy Executive Summary).

Destruction of those attributes has accelerated and the above “*initiative*”, long consigned to the waste bin. Perth Airport Development Group (PADG) continues to drive the need for revenue from every square metre of the estate. Under this regime, we are rapidly approaching the stage where no “**key environmental attributes**” will remain on the airport estate. A shocking indictment of Perth Airport’s performance.

- “*In light of the unique surroundings associated with aeronautical functions and ongoing development, this management plan presents a **sustainable approach** for management of conservation areas within the Perth Airport estate. This approach, in conjunction with Federal Legislation ensures the **ongoing viability of key environmental and cultural values at Perth Airport.***” (Conservation Precinct Plan 2012).

And,

- “*Westralia Airports Corporation has adopted **10% retention** of a vegetation complex as a target for the preservation of its biodiversity value, with **15% retention** as an **aspirational goal.***” (2009 Environment Strategy p. 112).

What happened to this “*sustainable approach*” and “*aspirational goal*”? With the 2020 Master Plan, PADG abandoned all the above. While this may have been claimed as ‘sustainable’ it conflicts with the EPA 2000 position that 30% retention is the point of rapid decline, so **NRPG contends that given the dire condition of our Environment and the “Nature Positive Plan” commitments, the new goal should be to restore those low levels of retention to 30%, as a minimum.**

While NRPG appreciates the significant preparation work carried out by the environmental staff and the opportunity to comment on this Plan, it does so in the knowledge that from past experience and the track record of PAPL, these comments will achieve little. Whilst the Airports Act remains “*the principal statute regulating the ownership, management and operation of leased Commonwealth airports*” environmental biodiversity losses through clearing for non-aviation developments will continue.

Current MDPs appear to be paying little attention to the increasing effect of the changing climate. The preservation of as much valuable habitat as possible within the estate is becoming vitally important. Natural vegetation is under increasing stress from periods of drought and the increasing threat posed by bushfires. Such fires are increasing in frequency and intensity, with a corresponding increase in loss of habitat.

Until the deficient Environmental Protection and Biodiversity Conservation (EPBC) Act is fundamentally reformed, 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.

Sincerely,

Steve Gates, President