



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

31 January 2023

Perth Airport Pty Ltd

Email: mdp@perthairport.com.au

Dear Dir/Madam

Re: Perth Airport Central Draft Major Development Plan

The Wildflower Society of Western Australia (the Society) makes this submission in response to your request for relevant comments regarding the Draft Major Development Plan (MDP) proposed for adoption for the Central precinct of Perth Airport.

The Society was established in 1958 to promote the value of our natural bushland. The Society does this through regular meetings and excursions, native plant sales, bushland plant surveys, book sales, donations, and attendance at relevant events. The Society has been an affiliated Member Society of the Australian Native Plants Society for many years with regular contact between the Regions, each operating independently and being responsible for managing its own affairs and memberships.

The Society has an unmatched, independent depth of technical knowledge of WA's wildflowers based on the work of its members and activities of its branches. The Society uses its independent technical knowledge of WA's wildflowers to help the community to better know, grow, enjoy and conserve the wildflowers of Western Australia.

The Society supports, and strongly commends to you, the comprehensive submission made by the Nature Reserves Preservation Group Inc. (NPRG), which has contributed significant knowledge, expertise, time and voluntary dedication as members of your Airport Consultative Environment and Sustainability Group. NPRG has a cross-membership with the Society. The Society also has branches with interest in the Airport bushland and other remnant bushland in the foothills of the Darling Range.

The Society makes the following general observations and comments regarding the MDP.

The draft document comprises over 400 pages of which Part B discusses the points which interest the Society. The Society considers such a voluminous document is not consistent with the requirements of a document suitable for public comment. A less convoluted document should be made available for the community to consider.

The Society is disappointed that this document continues to reduce the area of very high conservation value vegetation planned to be retained within the airport precinct. The continual erosion of these values through clearing for non-aviation purposes is not supported or warranted for the continued operation of the airport. The downgrading of the conservation values of the bushland and associated wetlands has no justification.



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The vegetation complexes found within the MDP area are represented areas that comprise less than 10% to up to 20% of their pre-European representation of those complexes on the Swan Coastal Plain. Loss of species diversity occurs exponentially when less than 30% representation occurs. The 30% retention level was recently set as a goal to be achieved by the Federal Government and is a global goal agreed at the COP15 conference on biological diversity. The Society believes **no further clearing** of vegetation should occur to enhance the potential to improve retention of existing vegetation on the Swan Coastal Plain and aid the increase of vegetation cover on the Swan Coastal Plain.

Further, the vegetation within the MDP area includes at least 3 Threatened Ecological Communities (TECs) protected under the Environmental Protection Biodiversity Conservation (EPBC) Act. The conservation actions described in the management plan for these associated require that no further clearing of these communities. The Society believes there is **no justification** for clearing of any Banksia Woodlands of the Swan Coastal Plain described as a Matter of National Environmental Significance as described in the EPBC Act irrespective of the area concerned and there should be no loss of area of TEC within the precinct under consideration.

Given the progressive development that has occurred at Perth Airport, the Society believes the MDP should include a cumulative impact assessment to address all environmental impacts, including clearing of vegetation. The cumulative loss of over 67% of native vegetation of Airport land to date further clearing on the estate by the Airport, and in areas surrounding the airport and beyond is not justified. The expressed goal of 'no new extinctions' of the Federal Government in 2022 cannot be achieved while clearing of patches of vegetation, as we have in the airport, continues.

The proposal to offset clearing through the acquisition of other area of similar vegetation is a flawed process. There is still a net loss in vegetation cover as the bushland secured does not increase the overall vegetation cover. It does not protect or increase the area of existing vegetation. It simply changes the land tenure without surety of conservation.

Although not of direct concern to the Society, the proposed MDP also has impacts on fauna, groundwater and wetlands within and beyond the area described in this Plan. The conservation of vegetation is also required to conserve these environmental values.

In conclusion, the continued loss of vegetation at Perth Airport is not acceptable and the Perth Airport Corporation should reconsider this MDP with a view to addressing the environmental shortcomings of the Plan and airport development to date, and those that would arise from implementation of this Plan.



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Yours sincerely



<http://www.wildflowersocietywa.org.au/>

President
Chair, Conservation Sub-Committee
Wildflower Society of Western
Australia

PO Box 519, Floreat WA 6014

president@wildflowersocietywa.org.au