



WILDFLOWER SOCIETY OF WESTERN AUSTRALIA (Inc)

Major Development Plan
Perth Airport Pty Ltd
PO Box 6
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2 March 2023

To Whom It May Concern,

The Wildflower Society of Western Australia writes to you to express our opposition regarding the Perth Airport Preliminary Draft Major Development Plan for Airport North (MDP). The society commends the extremely detailed environmental impact assessment that has been conducted but would raise the point that a document very content heavy such as this, provides barriers and limitations for the public to make comment. The society proposes that a more direct and concise document is prepared to create accessibility to the general public, in efforts to allow for a better understanding of the proposal and therefore expressions and responses to be submitted. The public comment period will be reopened or extended post the summarisation of the Environmental and Heritage Assessment (Part B) if Perth Airport does in fact value and desire the public's response and feedback.

This report will focus on the detrimental ramifications the proposed MDP has on our local flora as this is what the society has unprecedented knowledge and experience concerning. However, we also acknowledge the irreversible damage this project implements on our local fauna; wetlands; hydrology; and the disrespectful outcomes this has from a cultural perspective with relation to the Noongar First Nations Peoples, and the Aboriginal Heritage sites present.

The MDP offers no true justification as to why this is a necessary project to occur. The proposal that the benefits of this MDP exceed the value of the native vegetation within the proposal area is nothing short of comical and outrageous. The high conservation value which this small, remnant bushland maintains, outweighs the desire to expand infrastructure and development further which provides no necessary value to the area.

The MDP directly and indirectly impacts or destroys:

- Banksia Woodlands of the Swan Coastal Plain
- Threatened Ecological Communities (TECs)
- Matters of National Environmental Significance (MNES))
- Two ephemeral wetlands
- WA State recognised 'Bush Forever' sites
- 9 different vegetation types within the MDP
- State Listed Priority Flora Species
- Aboriginal Cultural Heritage Sites
- Commonwealth-listed threatened flora species

The vegetation complexes found within the MDP area are represented areas which 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% of pre-European representation occurs.

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The 30% retention level of existing vegetation 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 MDP will have significant impacts on the remnant vegetation and its inhabitants, and the individual remaining percentages along the Swan Coastal Plain and locally of the specific vegetation complexes. This has not been sufficiently addressed in the proposal or environmental assessment.

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. This perspective is supported by well-respected researchers and scientists within and out of the society.

Avoidance of the areas mapped as “retained vegetation” holds very small weight as the surrounding vegetation which performs as a protection and a buffer zone will be destroyed, leaving these vegetation areas of ‘Excellent Condition’ exposed and vulnerable. This will result in local extinction, loss of biodiversity, and no long-term survival of these communities.

Over 67% of the original (pre-European) native vegetation of Airport land to date, further clearing on the estate by the Airport, and in areas surrounding the airport and beyond will be or have been lost and destroyed. 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.

The Environment and Heritage Assessment has displayed a lack of assessment and research of the impacts, directly and indirectly that the progressive development by Perth Airport has caused. Therefore the society concludes that the MDP should include a cumulative impact assessment to address all environmental impacts, including the clearing of vegetation, and their sub complexes.

The MDP will fragment an already small, isolated, natural area, which further threatens local extinction of this high value biodiversity area, which also connects to an adjacent WA state-recognised Bush Forever site at Guildford Cemetery. The society rejects the idea of offsets in its entirety. As replication of the original vegetation, which typically includes an array of aspects and levels are not considered, and the time frame for this revegetation offset can take decades and centuries if ever, to obtain some relevant value which the original vegetation held. A key example would be the vegetation that supports the black cockatoo species; trees which can support hollows large enough for nesting sites can take up to 150 years just to have the potential for these hollows.

These offsets also do not consider local extinction of species reliant on the original vegetation and particular environment for their survival, due to the gap in time revegetated areas take to reach any kind of previous value. Again, dismissing the concept of ‘offsets’ as an acceptable ‘excuse’ to clear invaluable vegetation.

“One of our key commitments is ‘no net loss of biodiversity’ for all aviation and development projects. No net loss of biodiversity means that any loss of natural habitat caused by Perth Airport projects on the airport estate will be replaced through either land purchase or the restoration of degraded land, so that the total area of natural habitat increases.” (Perth Airport, 2022).



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Any clearance of native vegetation and further habitat fragmentation will result in a net loss of natural habitat and biodiversity. From Perth Airport's own statement, if this was a true representation of the Airport's means, the MDP will not proceed and nor will further development projects.

The society urges Perth Airport to cease development and planning of present and future projects until extensive scientific research has been conducted to dissect and reconstruct the Federal EPBC Act and 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. 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.

Native vegetation clearing, habitat fragmentation, reduction of biodiversity, are all irreversible choices and actions. The society's work is dedicated to the conservation and preservation of our native bushland, as we understand its value and uniqueness recognised as a global biodiversity hotspot. We implore others to consider the dire consequences projects like this have and to be the change to ensure our environment has a future.



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

Reference

Perth Airport. (2022). Airport North Major Development Plan – Part B Environment and Heritage Assessment. https://www.perthairport.com.au/-/media/Files/CORPORATE/Planning-and-projects/Major-Development-Plans/Airport-North---Airfield-Upgrade/Airport-North-MDP-PrelimD-Part-B_FINAL-website-version.pdf?rev=dce056f6c15e4cee8bd92f1ee46cf4&hash=8E379BEB153406B186D696C3EF5E5136

Perth Airport. (17 October 2022). Perth Airport receives a 100 per cent rating for its commitment to environmental, social and governance processes. <https://www.perthairport.com.au/Home/corporate/articles/2022/10/18/06/42/Perth-Airport-receives-a-100-GRESBA-rating>

Thank you to Nature Reserves Preservation Group of Kalamunda (NRPG). (2023). for "Perth Airport 'North' Major Development Plan (MDP) Submission Guide"