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Perth Airport Pty Ltd  
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### **Perth Airport draft MDP: Site 4 Tarlton Crescent**

The Urban Bushland Council WA Inc. (UBC) presents the following submission on this draft MDP. Please note that we are represented on the Perth Airport Consultative Environment and Sustainability (ACES) group by our Honorary Life Member Mary Gray OAM.

We also endorse and commend to you the submission made by the Nature Reserves Preservation Group (NRPG) which is a member group of the UBC. Please note that NRPG has also been on the ACES group for ~15 years. We strongly endorse the conclusions made by the NRPG.

**In summary, the UBC strongly opposes the MDP as it is environmentally unacceptable.** It will allow clearing and thus destroy very high conservation value bushland in Site 4 Tarlton Crescent in this MDP area of 16.29 ha. From the aerial photo in Figure 5-1 (on page 19), Site 4 is intact bushland. It was formerly classed by Perth Airport as a ‘**Conservation Precinct**’ and the conservation values are now even higher because of the past cumulative loss from clearing of the high value bushland on the Airport lands. The Site 4 bushland is irreplaceable and its clearing cannot be justified by offsets. There will remain a net loss of this very high conservation value bushland of national significance.

The proposal is for 80% of the MDP Area to be for ‘developable lots’. The justification is to provide “high quality developable land” with \$41 million of ‘economic output’ and 65 full time employment opportunities for the 12 month period of development. Total ‘output’ is estimated to be \$708.3 million. It also states that there are no environmental benefits, and a biodiversity offset strategy will be developed for the industrial precincts.

On page 20, the ‘Perth Airport Development Objectives’ includes:

- “Ensure that the airport’s development and operations minimise adverse impacts on surrounding communities and the environment.”
- “Uses endemic species for landscaping as far as practicable.”
- “Ensure Perth Airport achieves an adequate and sustained return on investment to support continuing development in the facilities.”

**So this proposal is all about increasing revenue from non-aviation developments. Perth Airport’s prime role is to provide safe airport facilities. This does not include industrial and commercial developments.**

Notably the proposed development area is close to the new runway. Noise impacts and lack of airspace protection will be issues. It is thus in the safety buffer zone of the runway and this alone is totally unacceptable.

### **Bush Forever loss and MNES loss**

There is a statement ‘Where possible, the development will reduce its impact on MNES and explore minimal light pollution’, and “also will ‘explore’ offsite restoration and protection beyond legislated requirements.” But this does not justify any of the clearing and consequent net loss of high conservation value bushland including the EPBC Act listed *endangered Banksia Woodlands of the Swan Coastal Plain*. The extent of this plant community is already well under the 30% retention target. Its Approved Conservation Advice under the EPBC Act states that the priority protection and restoration actions are:

**‘PROTECT the ecological community to prevent its further loss of extent and condition’;**

*ie* there must be no clearing of this endangered ecological community.

**‘RESTORE the ecological community within its original range by active abatement of threats, re-vegetation and other conservation initiatives.**

It states the ‘**highest priorities**’ are to ‘**Prevent further clearance, fragmentation and detrimental modification of remnants of the ecological community and of the surrounding native vegetation.**’

Another priority stated is: ‘**Prevent impacts to native vegetation, native fauna, hydrology or soil structure from any developments or activities adjacent to or near patches of the ecological community by planning for and appropriately avoiding or mitigating off-site effects. For instance, apply recommended buffers of at least 20-50m around patches of the ecological community and avoid activities that could cause significant hydrological change or eutrophication.**’

It is remarkable that Perth Airport Pty Ltd has over past years ignored all this advice. More details of this history is given in the submission by NRPG.

This means that the proposed clearing and commercial and/or industrial development of Site 4 Tarlton Crescent should not take place.

There will be a significant net loss. This bushland is irreplaceable. Notably also it is a Bush Forever site which is supposed to be retained, protected and managed to maintain its conservation values.

It is remarkable that Perth Airport is asking the WA State Government “*to remove all pockets of Bush Forever on the estate as part of future MRS Amendments*”

Thus Perth Airport wants to formally ignore all the outstanding bushland values and to destroy nature, its flora and fauna, and the tourism values of the former conservation precincts on the Airport lands.

This is totally unacceptable. It is also contrary to the WA Bush Forever ‘Conservation, Adequate, Representative’ (CAR) Reserve system for the Swan Coastal Plain.

**Instead, it is strongly recommended that Perth Airport withdraws this MDP and changes the whole of site 4 Tarlton Crescent to a ‘Conservation Precinct to be protected in perpetuity’.**

Notably, the Perth Airport Annual Environmental Report 2009/2010, considered the environmental assets on the estate, within the Conservation Precincts as “*regionally*

*significant and* [acknowledged] *that their proper management is important to all stakeholders.*” These conservation values should be maintained in what little bushland now remains on the Airport land. But this has been ignored.

### **Duty of care**

Perth Airport has a duty of care to the natural environment by abiding to provisions under the EPBC Act. This includes all the Matters of Natural Environmental Significance (MNES) at Perth Airport. It also has a duty of care to respect the WA government’s Bush Forever program. This means that all the natural bushland and wetlands remaining at Perth Airport need to be retained and cared for to retain their natural ecosystem values. Notably also the bushland provides critical habitat for the endangered Carnaby’s Cockatoos and for Forest Red-tailed Black Cockatoos, as well as for many other native bird species.

### **Offsets**

The proposed offsets are not ‘like for like’ and are far away from Perth Airport. Offsets cannot justify the net loss of high conservation values bushland and wetlands at the Airport. Revegetation or restoration cannot replace the complex natural ecosystems. The objective to ensure the proposed design “uses endemic species for landscaping as far as practicable” is not an effective offset or objective.

A priority action to PROTECT the above MNES is: ‘Avoid the requirement for offsetting, by avoiding and mitigating impacts to the ecological community first. ‘Like for like’ principles means offsets must be of the same sub-community *ie* same Floristic Community Type.

**The proposal is inconsistent with, and is indeed contrary to these requirements under the EPBC Act.**

### **Cumulative impacts from MDPs**

Perth Airport has suffered extensive loss of bushland and wetlands from past MDPs. This loss needs to stop. This is well explained in the NRPG submission.

### **Impacts on hydrology**

As described above, commercial and/or industrial developments will change the hydrology and soil structure on this low lying area of the Swan Coastal Plain. It will increase the risk of flooding in an extreme weather event with high rainfall, and even with normal rainfall. It will also likely change (increase) the pH of runoff to the naturally acidic landforms and its wetlands. Hydrologically downstream wetlands will suffer significant impacts. This will be an unacceptable impact of the change in land use from natural bushland and wetland. Indeed many years ago the WA State Government plans advised that the eastern side of the Swan Coastal Plain is not suitable for urban (including commercial and industrial land uses) developments for this reason.

## **CONCLUSION**

The draft MDP for Site 4 Tarlton Crescent is environmentally unacceptable on many grounds and should not proceed in any modified form. It is recommended that the MDP be withdrawn and that the whole 16.29 ha of site 4 Tarlton Crescent be classed as a ‘Conservation Precinct to be protected in perpetuity.’

The submission by the NRPG is attached for your attention again.

Yours sincerely  
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