

16 December 2022

National Airports Safeguarding Advisory Group
Email: safeguarding@infrastructure.gov.au

Dear Madam/Sir,

Re: Issues Paper - Review of Guideline C (wildlife strike) of the National Airports Safeguarding Framework (NASF)

Perth Airport Pty Ltd (Perth Airport) appreciates the opportunity to comment on the National Airport Safeguarding Framework (NASF) Guideline C Issues Paper.

Perth Airport would like to take this opportunity to highlight that within the state of Western Australia only one NASF guideline has been incorporated into State Planning Policy (Aircraft Noise). While Perth Airport fully support the NASAG and NASF, its effectiveness within the state is limited to airports advocating for governments to consider the guidelines within their planning.

Perth Airport have reviewed the paper and provide the following comments, split into the same three sections as per the issues paper:

- Guideline – Actions and Responsibilities
- Attachments – Land uses, activity types and buffers
- Other Parts of Guideline C

GUIDELINE – ACTIONS AND RESPONSIBILITIES

For ease of reading we have provided our responses to each of the specific paragraphs called out for discussion in Table 1.

- Paragraph 14 - Support
- Paragraph 15 - Support. Currently this paragraph makes no reference to Australia having obligations in this area with respect to ICAO. There is an opportunity for this to be fleshed out in a background section.
- Paragraph 16 – Support. For those jurisdictions without official policy in this area there is no basis for planning authorities to make a decision that assists in safeguarding nearby airports. For those jurisdictions without such policy, it is extremely important Guideline C is strengthened and made explicit enough so that it can attempt to fill this gap.
- Paragraph 17 – Support. Currently it is unlikely that a planning authority would get involved with a pre-existing land-use unless it was operating without approval. Perth Airport supports any suggestion in the Guideline that encourages greater action on behalf of planning authorities in this space.

- Paragraph 18 – Support. However the inverse should also be included; site-selection for land-uses that attract wildlife should consider any future aviation land uses nearby. Consultation with the local Department of Transport would be appropriate.
- Paragraph 19 - Agree that discussion of on-airport practises provides valuable context for off-airport planning authorities
- Paragraph 20 – Support. The ICAO example of no dumps being located within 13km is one of the actions that could be strengthened in the next revision of the Guideline to give planning authorities more weight to their decisions.
- Paragraph 21 - The role of planning authorities to refer potential developments needs to be strengthened. Active engagement on the part of the airport is important but it is impossible for airport staff to have visibility of all developments, especially where multiple councils cover an airport estate.

It is acknowledged that town planners lack the technical expertise to identify which developments are of concern and should be referred. Perth Airport believes this is the function the Guideline should fulfil. (I.e. the Guidelines should be the formal documents used by planners to identify what should be referred for expert advice, as well as being the documents that lend weight to their eventual decisions if their jurisdiction does not have official policy.)

This paragraph also states that Airport Operators should be in a position to provide assistance or advice to planning authorities. For large airports with ready access to ornithologists and other experts it is easy to provide robust, expert advice. Smaller airports may need to rely on anecdotal evidence. In the absence of formal policy, this falls short of the standard that planning authorities can base decisions on. In these cases it is worthwhile incorporating any general, expert advice into the Guideline so that those planning authorities and smaller operators would have at least some formalised documents to back up their decisions.

“Airport operators should include stakeholders... on Bird animal hazard management committee” It can be hard to get engagement and interest from these groups-even for large airports. Guideline should discuss the importance of these stakeholders engaging and encourage that engagement. Currently it is left entirely to the airport operator.

- Paragraph 22 – Support. Any language for stakeholders that stresses the importance of and encourages engagement would be welcome.
- Paragraph 23 - Perth Airport supports improving clarity around roles and responsibilities regarding engagement on wildlife attracting land uses, though a balance must be struck between the obligations on airport operators and land use planning authorities.

- Paragraph 24 – This paragraph only discusses mitigation. In some cases the land use should not be considered at all. However, this possibility is not discussed. This implies any land-use could be accommodated anywhere.

A wildlife-attracting land use could be approved on the basis that it is mitigated by operational measures. Planning authorities should not have the ability to make decisions that increase the operational burden of airports, particularly smaller airports. Similarly, if a condition on an approval is only minimally or tokenistically complied with, the airport has no ability to enforce reasonable compliance. Often a planning authority will not consider itself to be in a position to judge the effectiveness of an operational condition. As such, there is no way to mitigate this risk.

Perth Airport agrees any commonly agreed mitigations that could be applied on landscaping, or any other aspect of an approval, which minimises wildlife attraction should be incorporated into the Guideline. Otherwise, this advice will remain largely in the hands of major airports who have access to wildlife experts.

In response to discussion questions 3 and 4 – planning authorities generally only incorporate conditions based on stipulation in official policy and occasionally on Guidelines. The Guideline should contain as much, generalised, explicit advice as possible for planners and operators to refer to and lend weight to their decisions. Otherwise their decisions would be open to challenge.

ATTACHMENTS REVIEW

Perth Airport does not support land uses that are currently listed as incompatible in this attachment being listed as acceptable subject to mitigations. Some jurisdictions do not have the NASF Guidelines implemented as official planning policy. In these cases, should a proponent not comply with a condition, or have minimal compliance with it, there is little or no action an airport operator could take in the absence of robust compliance activity. Planning authorities will rarely rule on the effectiveness of an effort to comply with a condition.

The Rosehill residential development to the immediate north of Perth Airport was approved subject to, among other measures, aircraft noise signage on key entrance roads similar to those found in the vicinity of RAAF Base Pearce. The signs that were erected are considerably smaller than those around RAAF Base Pearce and often placed in locations where they are rendered inconspicuous due to other signage or foliage. Despite this being raised by Perth Airport with planning authorities numerous times, no action has been taken to address the lack of effectiveness of this condition. Guideline C should be written to, as much as possible, avoid a similar situation with a wildlife attracting use.

For proposed measures, broad and strict interpretations are preferable as there is no consistent national policy and some jurisdictions will not have enforceable policy regarding the matter. In these cases a softening of the Guideline is not considered appropriate as it will result in a less robust basis for planning authority decisions that mitigate or prohibit a land-use.

Perth Airport agrees that the buffers should be based on *current and future* runway ends and not the Aerodrome Reference Point. This includes all proposed new runways and extensions to current runways.

Perth Airport operations has raised one piece of specific advice that is currently missing from the Guideline and Attachments is how drainage infrastructure is to be treated. This includes detention, retention and compensating basins as well as open drains. Open drains on the Perth Airport estate are currently netted to deter birds. However, as airports around the country are often surround by large rail and road infrastructure as well as large, runoff-generating development; there is a need for off airport drainage infrastructure to be included into Attachment 1 or its future equivalent. Drainage infrastructure is currently not addressed at all.

ATTACHMENTS REVIEW

Perth Airport agrees the Guideline could benefit from a clearly expressed problem statement. Considering the off-airport focus of the Guideline a problem statement at the beginning could help provide context to a non-aviation audience.

Perhaps the problem statement could include some data? How much do bird strikes cost the Australian public per year? How many delays?

Further, it is important for novel proposals that the Guidelines are not just used for new development, but that they are also applied to novel land-uses on already developed land.

Perth Airport once again thanks the NASAG for the opportunity to comment.

Kind regards,



Jaxon Thomas
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