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23 December 2022

National Safeguarding Advisor Group
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam

Thank you for the opportunity to provide feedback into the review of National Airport Safeguarding Framework (NASF) Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports by National Airport Safety Advisory Group (NASAG). Council Officers have reviewed the issues paper and understand the NASAG are exploring opportunities for improving Guideline C.

Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports

Merri-bek City Council is closely located to both Melbourne Airport and Essendon Fields Airport, with the operation of these airports and the application of the NASF having direct implications to our municipality. In general, Merri-bek supports work that improves the operation and clarity of using the NASF guidelines. Point 17 of Guideline C is particularly important for Merri-bek's context:

The guidelines recognize that at many existing airports it may be difficult or impossible to change the existing usage of the land which serves as a wildlife attractant. In such cases, airport operators should work with land use planning authorities to mitigate the risk of wildlife strike.

Merri-bek contains land uses referred to as high and moderate wildlife attraction risk in Guideline C's Attachment 1 to Wildlife Strike Guidelines. Merri-bek has a number of significant environmental areas that are home to birdlife within vicinity of the airports. Of particular note are the Moonee Ponds Creek, Merri Creek, their tributaries and surrounding creek environments. These are important ecological spaces located within 5km of Melbourne Airport and Essendon Fields and are important not only to Merri-bek but Melbourne and Victoria. Merri-bek is also home to a large number of sporting facilities, parks and gardens and food manufacturing and storage businesses (located in our core industrial areas), all of which are an important element of our community.

Any changes to Guideline C to strengthen the roles and obligations of planning authorities must not focus purely on the obligation of the planning authority (local government) to manage, monitor and reduce all the risk, or disregard the importance of natural environments, community spaces and existing businesses over airport operations. A balance is imperative to manage and strengthen broader community outcomes within the municipality, including biodiversity, improved community facilities and economic success. The responsibilities within Guideline C should also not fall largely on local governments. Federal and state governments, and airport operators need to play an active role.

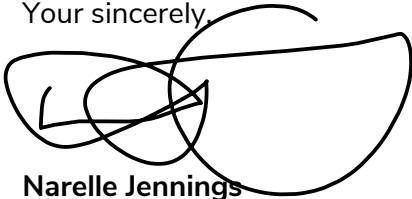
Attachment 1 to Wildlife Strike Guidelines

The land uses contained in Attachment 1 should align with land use terms policies (such as those set out in the Victoria Planning Provisions) and focus on those activities that require action, suggesting low and very low activities may not need to be defined. Greater clarity on the Wildlife Attraction Risk levels, including descriptions and metrics to back up these risk levels, would be beneficial and assist in mitigating these risks.

Whilst we support greater clarity of Guideline C, its application and link to Attachment 1 to Wildlife Strike Guidelines, the issues paper provides very little depth into the issues and options with improving Guideline C. We request that any proposed changes to Guideline C should undergo more targeted consultation with state planning services, local governments and other relevant stakeholders.

If you have any queries regarding this submission, please contact Kim Giaquinta, Unit Manager Strategic Planning via email kgiaquinta@merri-bek.vic.gov.au or telephone 9355 4210.

Your sincerely,

A handwritten signature in black ink, appearing to be 'Narelle Jennings', written over a large, faint circular watermark or background shape.

Narelle Jennings
Manager City Strategy and Economy

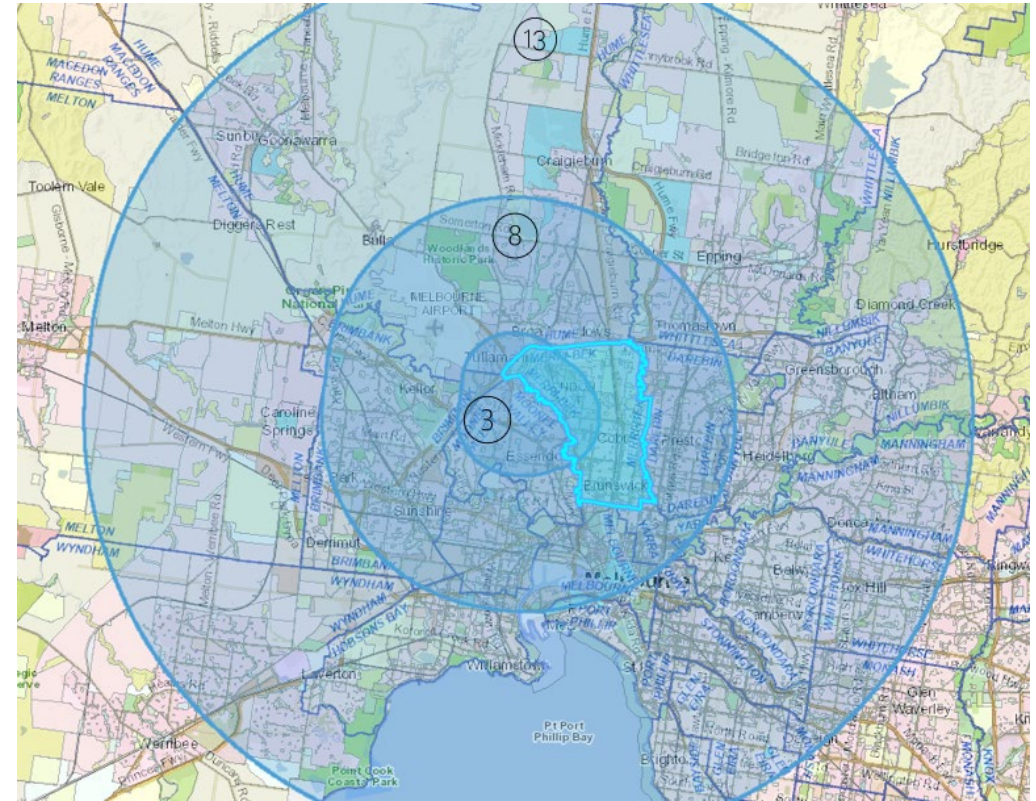
Maps showing 3km, 8km and 13km extent across Merri-bek CC measured from adjacent airports



Measurements from Melbourne Airport

Within 3km land uses include waterways and their important ecological environments, retarding basin, native grasslands and recreational areas (parks, playgrounds and picnic areas).

Almost all of Merri-bek is within 8km of Melbourne Airport. In addition to the above, Merri-bek's regionally significant industrial areas (containing food processing and storage businesses), shopping areas (major and neighbourhood activity centres), golf and other sports facilities and recreational areas are all within this 8km extent. Other waterways and their important ecological environments are also included in this extent.



Measurements from Essendon Fields Airport

Within 3km land uses include waterways and their important ecological environments, retarding basin, native grasslands, recreational areas (golf, sports facilities, parks, playgrounds and picnic areas), shopping strips and part of one of Merri-bek's core industrial area in Coburg North.

The remainder of Merri-bek is within 8km of Essendon Fields Airport, an area that includes Merri-bek's regionally significant industrial areas (containing food processing and storage businesses), commercial centres (major and neighbourhood activity centres), recreational areas and other waterways and their important ecological environments.

