



9 December 2022

Mr Phil McClure
Acting Chair
National Airports Safeguarding Advisory Group

Via email: safeguarding@infrastructure.gov.au

Dear Phil,

Response to NASF Guideline C: *Managing the Risk of Wildlife Strikes in the Vicinity of Airports* Issues Paper

Thank you for the opportunity to comment on the issues paper for the review of the National Airports Safeguarding Framework (NASF) Guideline C: *Managing the Risk of Wildlife Strikes in the Vicinity of Airports (the Guideline)*. Western Sydney Airport (WSA) is the Airport Lessee Company responsible for developing and operating Western Sydney International (Nancy-Bird Walton) Airport (WSI).

WSA recently worked collaboratively with the NSW Western Sydney Planning Partnership and Department of Planning and Environment (DPE) on the implementation of the NASF guideline principles into the planning framework for the Western Sydney Aerotropolis.

The following comments on the Issues Paper are provided in response to the matters highlighted in the paper.

What changes could clarify roles and responsibilities for planning authorities and airport operators.

To better clarify the roles and responsibilities for relevant parties within the Guideline, there should be consistent referencing through the Guideline in relation to 'local authorities/planning authorities'. WSA acknowledges that different jurisdictions use different terminology and suggests the 'Glossary' of terms and definitions in the Guideline be expanded to capture and define the terms 'planning authority' or 'local authority'. For example, paragraph 24 only refers to local authorities in relation to land uses.

To make responsibilities clearer, the relevant paragraphs could be presented in a table format, with a column for airport operators and land use planning authorities.

How could the guidelines be updated to better align with current planning and engagement practices?

Landowners/Tenants

The Guideline only references 'landowners'. In some instances, it will be tenants that will need to be consulted, rather than the landowner. Accordingly, it's recommended that any reference to 'landowner' throughout the document be changed to landowner/tenant.

Paragraph 23 only requires airport operators to record interactions with planning authorities. This should be expanded to also include the recording of interactions with landowners/tenants.

Existing Land Uses

For existing land uses, paragraph 17 of the Guideline currently states that airport operators need to work with land use planning authorities to mitigate the risk of wildlife risk. However, this is not always possible as the land use planning authority will have no authority for existing land uses (unless they are the owner/operator of the land or a new development application is lodged in to expand or amend existing land uses). Instead, engagement should occur with the landowner/tenant.

What additional guidance would improve the clarity of the guideline (e.g. detail around landscaping and design)?

The Guideline is focussed on existing land uses, proposed land uses and changes to land use zones. The Guideline could be improved by including commentary on the following two areas:

1) Landscaping and Stormwater Management

The Guideline should discuss and provide guidance on landscaping and stormwater management (where water is retained within the landscape in dams, basins, lakes etc) and is located within the wildlife buffers. This should address two situations:

- Where provided in association with a wildlife attracting use.

In these instances the land use will trigger consideration of the wildlife attracting potential of the development. Accordingly, the airport and/or planning authority will have the opportunity to consider whether the landscape and stormwater management can also be mitigated to minimise wildlife attraction. Guidance should be provided on how landscaping and stormwater should be managed within the wildlife buffers.

- Where not associated with a wildlife attracting use.

For non-wildlife attracting uses, where the referral of the application is not triggered by the land use, proposed landscaping and stormwater management may still attract wildlife. Guidance should be provided on how landscaping and stormwater should be managed within the wildlife buffers, even when not associated with a wildlife attracting use.

2) Land subdivision

Land subdivision (in addition to land uses and land use zoning changes) should also be a key consideration. Subdivisions have the potential to attract wildlife due to land disturbance (clearing, demolition and construction), especially where stormwater management (eg stormwater basins) is proposed in association with subdivision development.



How should the land use and activity types listed in Attachment 1 be improved?

Whilst Attachment 1 is useful, there are some opportunities for improvement. In general, the land uses identified should align with generic land use planning terminology. The most challenging relate to the conservation and recreation land uses. For example:

- 1) Reference to conservation land uses is not clear and needs to be reviewed. Additionally, there are often legislative requirements to provide a new conservation/protection status to areas e.g. to protect significant vegetation/habitat. Additionally, at times these may be provided ancillary to the primary development, rather than as a standalone use.
- 2) Further clarification could be provided on what constitutes a 'park' and 'picnic area'. For example, picnic areas are typically located within a park or open space area.

The different land use definitions of planning jurisdictions and the International Civil Aviation Organisation (ICAO) could be addressed by further defining and expanding terms in the Glossary section of the Guideline.

Attachment A should also be reviewed to reflect current business practices. For example, within the 3km wildlife buffer, putrescible waste facilities and food processing plants are considered incompatible. However, many new facilities are adopting new and emerging technologies and operate within internally enclosed facilities, with no external handling or storage of material undertaken. Accordingly, the Guideline could be updated to consider these modern practices and, where appropriate, identify where a merit-based assessment is appropriate. However, technology and management practices should not be the determinative factors in relation to the location of these facilities and appropriate buffers should be maintained to airports.

How should airport buffers be calculated and utilised?

Note 1 on page 3 identifies that the Aerodrome Reference Point should generally be used as the point of measure (for measuring the wildlife buffers). WSA recommends that it is more appropriate to measure the point of origin for the wildlife buffers from the runway ends.

What references or terms should be included or updated in the glossary?

The glossary includes the term 'land managers'. WSA suggests the definition be expanded to include 'tenants'. Text within the document, however, generally refer to landowners. The term 'landowner' should be clarified and defined to include tenant (in lieu of changing to landowner/tenant as suggested above).

We trust that the above is of assistance. If you have any questions, please contact me at kosborne@wsaco.com.au or the WSA Planning Team at planning@wsaco.com.au

Yours sincerely

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