

16 December 2022

Mr Phil McClure  
Acting Chair  
National Airports Safeguarding Advisory Group (**NASAG**)

Email: [safeguarding@infrastructure.gov.au](mailto:safeguarding@infrastructure.gov.au)

Dear Mr McClure,

## **Sydney Airport Submission**

Thank you for the opportunity to make a submission on the Issues Paper for the review of the National Airports Safeguarding Framework *Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports (NASF Guideline C)*.

Sydney Airport has a good relationship with local councils in the vicinity of the airport and works constructively with them on relevant wildlife management measures. This is particularly so with respect to those councils that immediately adjoin the airport.

However, NASF Guideline C requires airport operators and land use planning authorities (i.e. councils) to decide on appropriate action in relation to a particular existing or proposed development within up to a 13km radius of the aerodrome (see cl. 21). This represents an area of more than 530 square kilometres (see **Attachment A**), the majority of which would cover landmass with the remainder covering either parts of Sydney Harbour, Botany Bay or waters off the Sydney coastline. This area would overlap considerably with the same area applying to the Bankstown Aerodrome.

In the context of such a densely populated part of the Sydney metropolitan area, it is not practically possible for Sydney Airport to monitor all development activity within that area. Even monitoring proposals to rezone land within that area – in NSW these are called planning proposals – would be extremely difficult. There would literally be tens of thousands of development applications and potentially several dozen or more planning proposals every year.

We believe the onus should be on the local planning authority to notify Sydney Airport of any proposed land uses identified in Attachment 1 of NASF Guideline C. This could be achieved by the NSW Minister for Planning issuing a Local Planning Direction to relevant planning authorities under section 9.1(2) of the *Environmental Planning and Assessment Act 1979* (NSW). Such a direction would require the relevant planning authority to ensure that, when considering a planning proposal within the 3km, 8km or 13 km radius from the airport boundary, NASF Guideline C and, in particular, the listed land uses in Attachment 1 be considered. There should also be a requirement to notify the airport operator to seek its feedback on the proposal.

It should be noted that there already exists such a ministerial direction – Local Planning Direction 5.3: Development Near Regulated Airports and Defence Airfields – but it only addresses issues related to the protection of airspace and aircraft noise. This direction could easily be expanded to address issues relevant to NASF Guideline C as well.

As this change would only affect planning proposals, a similar mechanism would need to be put in place to ensure NASF Guideline C was considered when development applications seeking approval for one of the land uses listed in Attachment 1 to NASF Guideline C were being considered by the relevant planning authority. This should again include a requirement to notify the relevant airport operator.

We acknowledge that our suggestions here could not be given effect to under Commonwealth law and would require action by the NSW Government to be undertaken. Given the NSW Department of Planning and Environment (**DPE**) is represented on the NASAG we would appreciate this suggestion being brought to the attention of the relevant DPE official.

If you would like any further information, please feel free to contact me on 0409 072 436 or at [ted.plummer@syd.com.au](mailto:ted.plummer@syd.com.au).

Yours sincerely,



**Ted Plummer**

Special Adviser Government and Community Relations

