



20 February 2015

Mr Ted Plummer
Head of Government and Community Relations

By email: ted.plummer@syd.com.au

Dear Ted

Re: NASF Toolkit

The Southern Sydney Regional Organisation of Councils (SSROC) is an association of sixteen municipal and city councils. SSROC provides a forum for the exchange of ideas between our member councils, and an interface between governments, other councils and key bodies on issues of common interest. Together, our member Councils cover a population of over 1.6 million, or one third of the population of Sydney.

SSROC supports the airport, which is located within the southern Sydney regional area, and which is key employer as well as a major contributor to the economy locally, throughout Sydney, NSW and Australia nationally. SSROC understands the need for safeguards to apply for the safe and effective operation of Sydney Kingston Smith Airport.

SSROC considers that the needs of the airport must be balanced against the sustainability of the local area. The airport's safety record is excellent, and so we question the need for radical interventions that could result from the classification of "incompatible" land use. In particular, several land uses that are deemed to be incompatible within 3 kilometres are the very ones that we need to maintain and improve the sustainability of the area.

Particular issues:

Fish processing and food processing: these are important activities and these days often well contained within factory-like conditions. Any effort to eliminate such plants would jeopardise economic and employment opportunities. They should be carefully assessed to judge whether or not the individual operation would really be a wildlife attractant, and if so then whether the risk posed would be likely to include aircraft bird-strike.

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Food/organic waste facility: NSW government and councils are encouraging householders and commercial operators to increase the recovery of organic material. Facilities for processing such material are often now contained in order to enhance output production, and are unlikely to be an attractant to wildlife. Such facilities actively seek to avoid contamination of product from wildlife. They also represent employment and economic opportunities, and are in addition an increasingly important component in essential waste management infrastructure. This type of use should continue to be subject to council assessment and not automatically deemed to be incompatible.

Putrescible waste facility – transfer station: Sydney Councils are responsible for the removal and disposal of putrescible waste, and there is a shortage of transfer facilities in the area. The movement of garbage trucks is essential to the area, but there is an opportunity to reduce those movements somewhat by using local transfer facilities where waste is compacted and consolidated for removal by rail or by a single large truck. For this reason SSROC supports the establishment of new transfer stations in the area.

Modern transfer stations are subject to strict environmental controls. Where located close to residential areas, odour is carefully managed and waste is rapidly containerised within a pressure-controlled building. As Sydney grows and population density increases, more transfer stations will be required, including in the eastern part of southern Sydney. The industrial areas around the airport are among the best available locations, given the truck necessary truck movements and the potential need for freight-rail access. SSROC suggests that the airport should consider these facilities essential infrastructure, and should therefore work with operators to ensure that risks – which we understand are manageable – are mitigated. This type of use should continue to be subject to council assessment and not automatically deemed to be incompatible.

The Ramsar-listed Towra Point Nature Reserve is just outside the 3km radius, and therefore falls into the airport's "mitigate" category. Under the Ramsar Convention, Australia has committed to:

- "work towards the wise use of all their wetlands;
- designate suitable wetlands for the list of Wetlands of International Importance (the "Ramsar List") and ensure their effective management;
- cooperate internationally on transboundary wetlands, shared wetland systems and shared species."

SSROC emphasises the need for these wetlands to be effectively managed. They, together with Australia's other wetlands, are critical for the ecosystem services that they provide to humanity. These services include biodiversity, flood control, groundwater recharge and climate change mitigation. Any airport safeguards that are put in place need to be balanced against humanity's need to preserve these increasingly scarce resources.

Part of the purpose of this particular reserve is to attract bird species to an environment suitable for them. It is a wetland of international importance, largely because it is a breeding ground for many vulnerable, protected and endangered species. There is a legislated

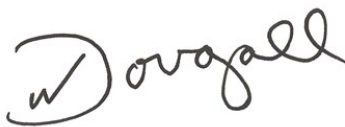
requirement to protect threatened species and endangered ecological communities¹, and councils contribute to this by delivering and facilitating programs to restore bushland and habitats that deliberately attract wildlife. There is clearly potential for conflict with the toolkits proposal, which needs to be acknowledged and addressed: a balance has to be reached. SSROC therefore urges SACL to implement airport safeguards that prevent bird strikes, and to ensure that safeguards do not adversely affect the Towra Point Nature Reserve, its biodiversity or migratory birds.

SACL is understood to have made good progress in recent years with its own Wetland Enhancement Program installing a gross pollutant trap and a fish ladder, surveying fish species and replanting Engine Pond with native plant species. SSROC encourages SACL to continue this positive initiative.

Thank you for the opportunity to provide these comments. The airport is a very important part of our economy, and is particularly important to the local area as a major employer and economic contributor. SSROC is therefore keen to ensure its continued, safe operation. I am pleased to provide these brief comments, and would be happy to continue to work with the SACL and our member councils to this end.

Should you wish to discuss them, or need any clarification, please do not hesitate to contact me or SSROC Program Manager, Helen Sloan on 9330 6455 or ssroc@ssroc.nsw.gov.au.

Yours sincerely



Namoi Dougall
General Manager
Southern Sydney Regional Organisation of Councils

¹ *Threatened Species Conservation Act 1995*