



Blue Mountains Conservation Society Inc

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Nature Conservation Saves for Tomorrow

7 December 2018

Mr Anthony Lean
Chief Executive
Office Environment and Heritage
Via email info@environment.nsw.gov.au

Cc Mr David Crust
Manager, Blue Mountains Region

Dear Mr Lean

Katoomba Airfield, Medlow Bath

The Blue Mountains Conservation Society is a community-based volunteer organisation with over 800 members. The Society's mission is to help conserve the natural environment of the Greater Blue Mountains region.

The Society has recently written to the NSW Department of Industry – Crown Lands and Water (the Department) in relation to recent advice received from that department in regard to the future of the Katoomba Airfield (copy attached). The Department advised the following:

In 2017, following the surrender of an expired Special Lease of the property, the Department conducted an Expressions-of-Interest campaign to assist in determining the future of the site...As a consequence (of the EOI process), a new Licence, conferring on Derek and Floyd Larsen a right of non-exclusive occupation of the site, for Aerodrome and Land Management Purposes, commenced on 1 February 2018. The Licence is terminable at will, and represents an interim tenure while conditions of a future lease are under negotiation.

As you can see from our letter, we have serious concerns regarding the process the Department has undertaken to date, including the apparent lack of community consultation prior to the issuing of the current licence to Derek and Floyd Larsen. We also have a number of concerns in regard to the proposed community consultation to be undertaken prior to the issuing of any long term lease.

Background

The Society has been making representations about the future use and management of the Katoomba Airfield site since 1997. The government assessments of Katoomba Airfield have consistently recommended that the site be added to the Blue Mountains National Park and only used for emergency uses.

In 2000, an assessment of the site was undertaken by the then Department of Land and Water Conservation. As one of the contributors to this process, the Society received a letter dated 2 Nov 2000 from the department which stated it:

proposed to add the area to the Blue Mountains National Park upon expiry of the current lease subject to discussions yet to be held between the relevant stakeholders....Upon addition of the area to the National Park it is proposed that those facilities required for bushfire surveillance and suppression including emergency use of the airfield and any infrastructure will be maintained by agreement of the relevant authorities. The areas of the site not required will be returned to natural bushland.

In 2008, the then Department of Lands undertook yet another assessment process in terms of the site, which concluded the preferred future use of the site should be limited to emergency use and for the site to be incorporated into the Blue Mountains National Park.

The Society strongly supports the recommendations of these relevant state government agencies in 2000 and 2008, that is, that the land should not be privately leased and that the site be incorporated into the Blue Mountains National Park and used for emergency and bushfire air operations only.

National Parks and Wildlife Service (NPWS) position on the future use of the airfield

The Department also advised the following:

Your letter makes reference to preferences for future management of the land expressed by Blue Mountains City Council and the National Parks and Wildlife Service between 1999 and 2008. I wish to advise that, in consulting both agencies prior to the 2017 EOI campaign, the Department drew attention to the historically expressed view that Katoomba Airfield should be reinstated within Blue Mountains National Park. Neither agency expressed its opposition to the planned EOI campaign. Nor has either raised any objection to the outcome.

The Society is concerned that the NPWS did not raise concerns or oppose a future commercial lease over the airfield, especially given the negative impacts on the Blue Mountains National Park from the airfield to date.

Specifically, the Society is keen to hear from the NPWS its views in relation to the following issues.

Commercial joy flights

Previous use of the airfield for commercial joy flights was controversial and heavily opposed by the community, with residents in Medlow Bath, North Katoomba and areas adjacent to scenic lookouts in Leura, Katoomba and Wentworth Falls particularly impacted. Walkers and park users also complained of low flying aircraft, including in remote areas.

In response to community concerns in 1993 the Blue Mountains Fly Neighbourly Agreement (BMFNA) agreement was developed in 1994 between aircraft operators and the community to reduce the disturbance caused by aircraft, particularly joy flights, within the Blue Mountains. The BMFNA is a voluntary agreement under which aircraft operators agree to operate in a certain manner which includes limits on operating heights in areas identified as environmentally sensitive (including large areas of the Blue Mountains National Park) and the frequency of operations.

As the BMFNA is a voluntary agreement there is no compliance monitoring or enforcement and no avenues for residents to pursue when breaches occur. As a consequence, the BMFNA has proven totally ineffective in managing the impacts of commercial joy flights within the Blue Mountains.

The Society is keen to know the NPWS's view in relation to any long term commercial lease over the Katoomba Airfield which allows commercial joy flights or other low-flying intrusive flights over the national park.

Environmental impacts

The Airfield is an inholding within the Blue Mountains National Park. Whilst the Society recognises the value of Katoomba Airfield for emergency uses, we are concerned about the environmental impacts of its operation. Previous leaseholders did not adequately manage the site to prevent soil erosion and sediment movement, groundwater contamination or weed invasion, and associated negative impacts on the national park.

The Society are keen to know if the NPWS shares these concerns and how these issues could be managed through lease conditions, if a long term lease is to be issued.

Management impacts

The extent and range of activities the new licensee is proposing for the site is unknown at this stage but it appears they will include a range of tourism related activities. The issuing of a commercial lease over the airport is likely to lead to increased activities on the site. This includes increased visitation and traffic along the road to the site which is managed by the NPWS. This will result in increased management costs (eg more frequent grading). The Society would be keen to know what the NPWS's view on how it will deal with increased management costs arising from any commercial lease.

Incorporation of the site into the national park, with management of an emergency use airfield by NPWS

The Society would like to know if the NPWS supports the incorporation of the site into the national park, with NPWS managing the site as an airfield for management and emergency purposes only.

The NPWS manages a number of airfields within the national park estate already (especially in national parks in the western part of NSW) for management purposes and for emergency uses including bushfire fighting. Airfields within national parks are not without precedent and are consistent with the legislative objectives of a national park if their use is limited to management purposes and for emergency uses including bushfire fighting. Given the strong public support by the local Rural Fire Service (RFS) for the Katoomba Airfield to be available for bushfire fighting purposes, one option if the site is incorporated into the national park is to pursue cost sharing of management costs of the airfield with the RFS.

Your assistance in providing NPWS's views on the above issues would be much appreciated. Please contact me if you have further questions in relation to this letter.

Yours sincerely



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