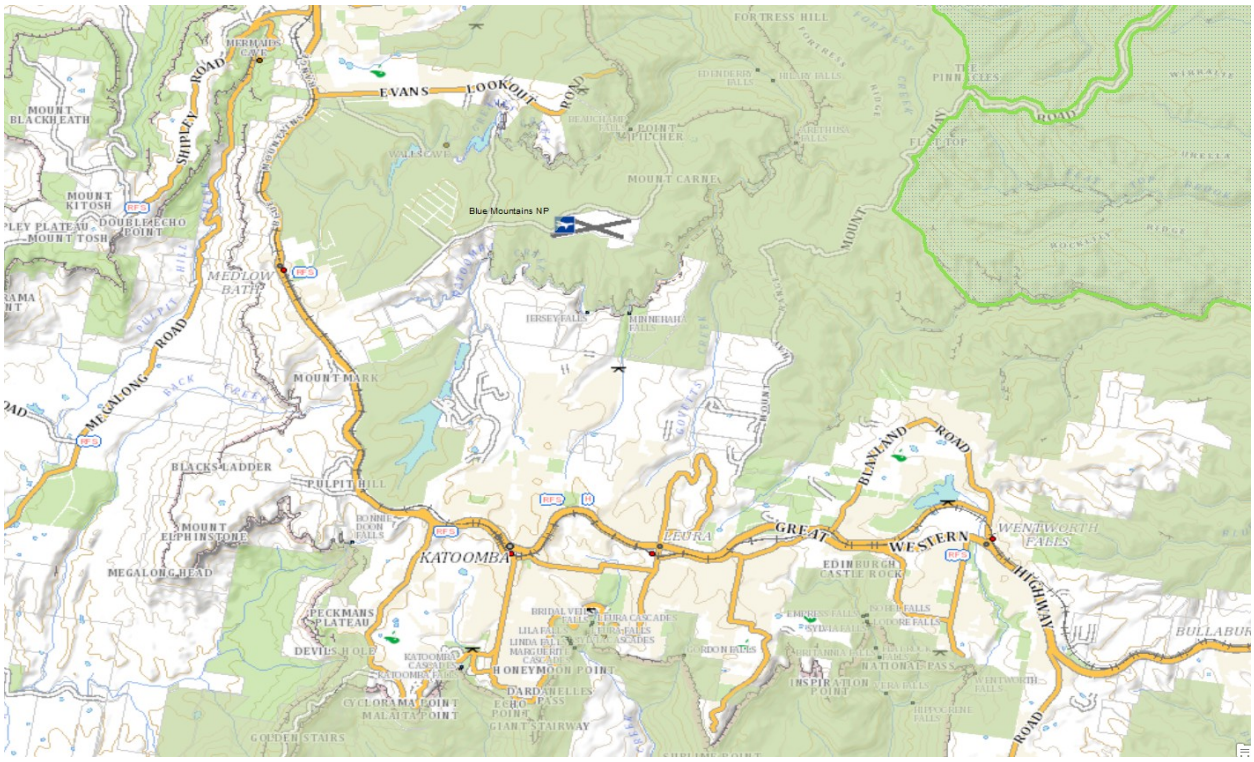
KATOOMBA AIRFIELD - HISTORY & BACKGROUND

Compiled by Blue Mountains Conservation Society May 29 2019

LOCATION - an inholding of Blue Mountains NP

This site is surrounded by the Blue Mountains National Park on all sides.
Lot 550 DP 751627 Parish of Blackheath
Area of site = 35.7 ha (DLWC 2000)
Katoomba Airfield is located at the end of Grand Canyon Road in Medlow Bath.

This strategic location has been important for bushfire fighting and other emergencies.
As an 'inholding' private use creates a number of difficulties for the management of the Park.



CURRENT TENURE

Crown Land - Public Land managed by NSW Govt through Dept of Industry, Crown Lands

2017-2019 LEASE PROCESS

Dept Industry is currently in the process of issuing a new long-term lease to a private commercial operator.

The Department conducted an Expression-of-Interest (EOI) process in Sept 2017 seeking parties interested in entering into a new lease. As a consequence of submissions received via the EOI process, a short term licence was issued to private commercial operators Derek and Floyd Larsen commencing on 1 February 2018. The Department has assured the Society this licence is “terminable at will, and represents an interim tenure” while conditions

of a future long term lease are negotiated with the licensees (ref copy of Licence).

In late 2018 the Department advised that it anticipated receiving from the licensees a business plan that will set out the scope of future activities it proposes to conduct on the site, as well as a proposed environmental management plan for ongoing environmental rehabilitation and conservation of the site. The Department has assured the Society that "environmental management is at the forefront of the Department's leasing negotiations for Katoomba Airfield" given "the sensitivities of the land and its location within a world heritage area". This business plan and commercial lease application have since been received by Dept Industry (Crown Lands).

The Department advised that community consultation will be undertaken prior to the issuing of any long term lease. The Department also advised that they are currently identifying potential stakeholders for the community engagement process and that the "Blue Mountains Conservation Society is considered to be a key stakeholder, and will be actively consulted".

PREVIOUS REPORTS & COMMITMENTS

The process to proceed with a commercial lease is in direct conflict with previous studies and commitments by NSW government. Assessments of Katoomba Airfield have consistently recommended that the site be added to the Blue Mountains National Park and used for emergency and bushfire air operations only.

During 1999-2000 the then Department of Land and Water Conservation undertook a formal Land Assessment process for the site. The Draft Document on public exhibition March – May 2000 stated :

- NPWS interest in addition to Blue Mountains National Park.
- EPA concerns about increased aircraft use
- DLWC conclusion that "expansion of operations at the airfield is clearly inconsistent with the findings of this land assessment"
- The importance of groundwater contamination risks with increased use as airfield due to fuel storage

It recommended site rehabilitation and continued availability for bushfire and other emergency purposes, based on its 'land capability, significance and suitability ratings'

As one of the contributors to this process, the Society received a letter dated 2 Nov 2000 in which the department stated

> that 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 of the site, and invited Blue Mountains City Council to participate in a consultation process for the future use and management of the site. Council's submission objected to the sale of the land or the reissuing of a private lease. Council's preferred option was again that the site be limited to emergency use and be incorporated into the Blue Mountains National Park.

The Society strongly supported the recommendations of Council and the relevant state government agencies in 1999, 2000 and 2008, and 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.

In emails to residents and the Society, DOI has implied that this support by Council and NPWS has not continued. The Department of Industry has advised the Society that in recent discussions with NPWS and Council in regard to the new license that "neither agency expressed its opposition to the planned EOI campaign. Nor has either raised any objection to the outcome" (email Aug 24 2018). We understand that neither of these agencies were asked to comment, nor would it have been appropriate to make unsolicited comments.

NPWS position:

Anthony Lean Chief Exectuive of OEH (incNSW National Parks and Wildlife Service) stated in a letter to the Society dated 21st December 2018
'As you are aware, the Department of Industry (DOI) Crown Lands continue to have statutory responsibility over the area. The airfield is under a three- year lease arrangement, which commenced in February 2018. the National Parks and Wildlife Service (NPWS) has indicated to DOI a willingness to consider rationalisation of the airfield and national park boundary. However any consideration of inclusion of the airfield into national park would require consultation with key stakeholders. DOI is aware of NPWs' interest in participating in any consultation it leads around the future of the airfield.'

BMCC position

Council resolved at its meeting 27 April 1993 "*to write to the Minister for the Environment, Mr Chris Hartcher, to ….."confirm that the Council does not consider helicopter joy flights are appropriate to the environment of the Blue Mountains and the natural environmental attraction to tourists"*

Council resolved at its meeting of 9 November 1993 "*to write to the state Government, as a matter of urgency requesting a review of the legislation pertaining to the use of helicopters, particularly in relation to joy flights over areas that are of local, national and international significance due to their natural environmental features which are now threatened*"

16 October 1994, Public meeting held by BMCC in response to complaints and concerns of residents from late 1992

In December 1999, Blue Mountains City Council resolved to oppose the continuation of the private lease and requested that the land be incorporated into the Blue Mountains National Park.

2008 BMCC reaffirms its position of the and to be incorporated into National Park, and oppose private lease or sale

Oct 2017 Blue Mtns Aviators Club sought council support for application for a "community lease" – councillors given inadequate report which made no mention of:

- option of NPWS managed emergency airfield
- BMCC previous position opposing private commercial lease
- 20 years of assessments and consistent recommendations

BMCC has since actively opposed Badgery's Creek Airport on noise, environmental and World Heritage issues.

WORLD HERITAGE MANAGEMENT ISSUES

Management Issues re locating commercial airfield within the National Park include:

- impacts of noise on local fauna- continual disturbance of habitat
- impact of noise on park visitors
- airfield users will be travelling through approximately 1 km of National Park on dirt roads
- introduction of weeds from unsterilized vehicular traffic (increased volume)
- pollution from aircraft fuel
- accurate records of use, monitoring of compliance with World Heritage standards
- cost - compensation may need to be paid for each day the airfield is taken over for emergency use. The greater the commercial use the higher the cost to taxpayers

Other concerns include the protection of the threatened Blue Mountains Swamps on site, the migratory paths of birds, soil erosion, and groundwater contamination.

Weed, sediment & nutrient impacts are acknowledged by DLWC 2000 Land Assessment
The DLWC 2000 site assessment covered the extent of erosion on both runways and the impact of this sediment on watercourses and sensitive vegetation.

EMERGENCY AIRFIELD ISSUES

Fixed wing aircraft require longer runways than helicopters, therefore greater environmental impact. Currently the airfield is closed to fixed wing; upgrade and repair is needed to open it.

We understand that the Rural Fire Services would prefer to be able to operate fixed wing aircraft on occasions from this site. NPWS & RFS currently use Richmond for large fixed wing aircraft.

Can we have an emergency airfield without joy flights?

NPWS could manage this airfield for emergency use. NPWS manages a number of airfields within national parks; eg Mutawintji and Sturt National Parks, and Nocoleche Nature Reserve

Funding - for initial rehab from external source - $70,000 quoted
Bushfire Risk Mitigation and Resilience Program* - Treasury.
(*previous committee member Chris Lewis)
Maintenance – $5,000 pa quoted

POTENTIAL USE under COMMERCIAL LEASE

The experience of joy flights from 1992 – 95 can be expected with increased frequency from a developer with more resources.

The issue is NOT about what the current licencees are proposing, but what is possible in the **long term** under a commercial lease.

- Increased air traffic
  Proximity means more possible than if based at Bankstown

- Commercial possibilities include
    - joy flights over National Park ?
    - other commercial activities?
- Lease conditions based on Business Plan which is not public

Possible Flights_ -

- Typical helicopter speed - 130 mph …. 35km in 10 minutes
- Allows 2 x 15 mins flights ph per helicopter
- Grose Wilderness is on the doorstep (ref 1992-95 map)
- Proximity of Airfield to NP = cheaper and shorter, therefore more flights

Noise Impacts of frequent flights - helicopter

- for residents of Medlow Bath and Katoomba
- for 5.2 mill visitors to the BM NP pa (2016)
    - bushwalkers in the Grose Valley and Grand Canyon
    - for visitors to Echo Point.
- Wildlife

Other environmental issues -

- impacts on native fauna especially birds, (international studies)
- groundwater contamination impacting nearby hanging swamp (fuel storage)
- fuel emissions – unburned fuel during take off and landing
- climate change – fossil fuel burned for non essential purposes…(planting a tree that takes years to mature does not mitigate it)
- soil erosion
- weed invasion
- re World Heritage Values

ENVIRONMENT IMPACTS OF INCREASED LOW FLYING AIR TRAFFIC

(a) **International Studies** show **impacts on Native Fauna**

- Bird migration disruptions
    - death, feeding patterns + strength
- Fauna reliant on hearing
    - feeding, mating, care of young, predator avoidance
- Response to sudden sight, movement, sound
    - physiological stress
    + flow on effects

(b) Blue Mountains World Heritage values

- **UNESCO criteria** is broader than eucalypts. It recognises the biodiversity values and the interdependence of each aspect. Ecosystem interaction is recognised in 2 criteria. Any major disruption to any element will impact on the whole.

    UNESCO listing of **Blue Mountains World Heritage values** Criteria (ix) states: "...Representative examples of the dynamic processes in its eucalypt-dominated ecosystems cover the **full range of interactions between eucalypts, understorey, fauna, environment and fire**..."

- **GBMWHA Strategic Plan** excerps
  KEY ISSUE 7 Landscape, Natural Beauty and Aesthetic Values p33
  Objectives
  To protect the landscape, natural beauty and aesthetic values of the GBMWHA.

  Background

The GBMWHA's wilderness qualities have particular aesthetic value to local communities and park visitors alike. The undisturbed natural environment is one of the important qualities that attracts residents to live in areas adjoining the GBMWHA. Potential threats to the appreciation of the area's aesthetic values include inappropriate lighting as well as overflights by helicopters, low-flying jets and other aircraft.

A Fly Neighbourly program has previously been established in the Blue Mountains National Park to minimise impacts of aircraft but this needs to be reviewed and stronger and more extensive controls applied.

Desired outcomes
• Any adverse impacts on the natural beauty and aesthetic values are prevented, eliminated, or at least minimised.
• Recreational and tourist overflights do not interfere with the natural quiet, biodiversity and GBMWHA aesthetic values.

Management Response (p34)
7.5 Continue to work with the relevant agencies, aviation industry and military to implement and monitor the existing Fly Neighbourly program to ensure that any impact of aircraft on the GBMWHA (especially wilderness areas), park visitors and neighbouring communities is minimised.
7.6 Seek the establishment of a Restricted Area under the Air Services Regulations to provide statutory restrictions on tourist flights over the GBMWHA.

(c) Legal Test Case re World Heritage Areas

A test case for the operation of federal environmental laws has commenced around a development proposal in Tasmania. A private developer proposes to build luxury huts and a helipad at Lake Malbena in the World Heritage-listed park (120 flights pa)

REGULATION OF FLIGHTS over National Parks?

No agency regulates the airspace over NP's, wilderness areas or WHA. NPWS has no powers. Airspace regulation & World Heritage Areas are both federal issues.

There is a ***non-enforceable*** voluntary agreement called the Blue Mountains Fly Neighbourly Advice (FNA). …1994

- voluntary
- no enforcement by any government agency (CASA does not regulate)
- no monitoring possible
- no penalties

Guideline is for a min altitude 2000 ft above surface within radius of 600 m of point vertically below aircraft. This takes no account of effects of valleys and escarpment walls on sound. Dept Industry has notified us that the FNA has been reviewed by NPWS and the proponent, however the Blue Mountains Regional Office of NPWS has no knowledge of this.

APPROVALS REQUIRED for Commercial Operation

Depending on detailed proposal:

- Commercial lease over the Airfield issued by the Department of Industry
  Interim licence can be withdrawn without compensation

- Licence issued by the Environmental Protection Agency

If > 30 activities pw – 15 flights and house located within 1 km
Noise, environment, public are considerations
Process for submissions is same as that for DA

- Development consent issued by Blue Mountains City Council
  DA for use as airfield likely (no previous DA);
  required for new structures and sealing tarmac etc

- Elected government can intervene and stop process -
  - **government decision** not to proceed with the transfer of the airfield to NP
  - Minister to approve/reject lease

Summary of Issues

Tenure & Management – commercial vs public

Funding for emergency use – rehabilitation & maintenance

Commercialisation issue re World Heritage Values
- WHA Strategic Plan
- NP Plan of Management

Probity issues - EOI process commenced 21 months prior to community consultation

Impacts on residents and National Park visitors

Impacts on tourism dependent businesses

APPENDIX

HISTORY OF AIRFIELD LAND

1925	Army survey identified land as suitable for an airfield
1959	Blue Mountains National Park gazetted
1960s	Land **excised** for Airfield
…….	NPWS 'agreed to exclude the airfield from land to be added to the national park at that time provided that the land was added to the National Park upon
…….	the expiry of the lease in 1988. The then Lands Department agreed to this process. (DLWC March 2000, p45)
1968	NPWS expressed interest to Dept for land to be added to the National Park Lease was extended for a further 20 years because of the perceived importance of the airfield to the region. Granted to Barry Shaw. The agreement to incorporate land into NP was not honoured.
1988	Commercial lease granted to Katoomba Airfield Pty Ltd, to 2008 Gazettal of land as Crown Land "for public purposes"
1992-95	Helicopter joy flights over the National Park from Airfield. Community campaign – extra EPA licence conditions imposed in Dec 1995 Joy flights discontinued – Dec 1995
1999-2000	Land Assessment & consultations- BMCC & NPWS - supported Airfield incorporated into NP Dept Land and Water Conservation report (March 2000) Recommendation to transfer land to NP
2008	Commercial lease expired, NSW proposes **sale of land** BMCC reaffirms position of land to NP, opposes private lease & sale of land Site occupied on monthly arrangement until 2017. Minimal commercial activities – airfield begins to fall into disrepair.
2016	DOI seeks position of NPWS - NPWS reaffirmed interest
Feb 2017	Dept Lands acknowledges agreement that "the land would be returned to the Park" (letter to CASA)
Sept 2017	Dept Industry calls for EOI from parties interested in lease or licence NPWS not invited to submit case. No community consultation
Oct 2117	Blue Mountains Aviators Club sought council support for a "community lease". Report to council did not cover: • option of NPWS managed emergency airfield • its previous position opposing private lease • 20 years of assessments and consistent recomm's
Feb 2018	Interim license issued to private commercial operator ("terminable at will") Licensee invited to submit business plan for l/t lease. Negotiations start.
June2019	Consultations with community planned.
July 2019	Minister to approve / reject lease