

17 March 2025

Sully Munk

Principal Planner, Industry Assessments

Department of Planning, Housing & Infrastructure (DPHI)

4 Parramatta Square, 12 Darcy Street

Parramatta NSW 2150

Dear Sally,

Re: SSD10446: Luddenham Advanced Resource Recovery Facility – Management Plans Preparation

I refer to the Development Consent (SSD 10446) (Consent) for the Luddenham Advanced Resource Recovery Facility, which was granted on 13/08/2024 for construction and operation of an Advanced Resource Recovery Facility.

Condition B7(a) (Wildlife Hazard Management Plan for Stage 1 Operations) and condition B9 (a) (Foreign Object Debris (FOD) Management Plan for Stage 1 Operations) of Consent require approval from the Planning Secretary for the appointment of a suitability qualified or experienced person(s) to prepare the management plans. Coombes Property Group has identified suitably qualified and experienced people to prepare these management plans and is seeking formal approval from the Planning Secretary for their appointment.

Dedicated Aviation Project Team

Biodiversity Australia Pty Ltd currently have resources available to develop these plans. The table below summarises the proposed team members, their participation profiles, and their intended role to complete the requested scope of work. More detailed information on the company's experience is provided in Appendix A.

Project Team Member	Company Title	Project Role
Chris Perry	Aviation Operations Manager, Principal Aviation Ecologist	Chris Perry will be primarily working on the FOD management plan for Stage 1 Operations to address condition B9 (a) of SSD10446
Stuart Butler	Business Manager Aviation	Stuart Butler will be primarily working on the Wildlife Hazard Management Plan for Stage 1 Operations to address condition B7(a) of SSD10446
Karl Robertson	Senior Business Manager Senior Project Director Principal Ecologist	Karl Robertson will be available as support for the plans delivery and provide any Principal consultant assistance for the project if required.



We look forward to your consideration of this request. Please feel free to contact me on 0415556620 or elena@coombesgroup.com.au should you have any questions.

Yours sincerely

On Behalf of Coombes Property Group

A handwritten signature in black ink, appearing to read "Elena", with a long horizontal stroke extending to the right.

Elena Ivanova

Environmental & Planning Manager

Appendix A – Projects Experience (CVs)

Our people

Christopher Perry

Aviation Operations Manager, Principal Aviation Ecologist

Professional profile

As BA Aviation's - Aviation Operations Manager and Principal Aviation Ecologist, Christopher (Chris) oversees compliance and management of our Airport Operations Services. He leads a team of Airport Managers, Works Safety Officers, Aerodrome Reporting Officers, and Aviation Wildlife Management Officers.

Chris is a highly qualified Aviation Safety Specialist and one of the few experts holding degrees in both Airport Management (Griffith University, 2016) and Conservation, Biology, and Ecology (University of Exeter, 2010). He has also undergone formal training in mitigating wildlife strike hazards and completed an aviation-specific Lead Auditor and Assessor course (Southpac Aerospace, 2018).

With nearly 15 years of experience in aviation operations and risk assessment, Chris has held management and consulting roles within the aviation sector, specialising in wildlife business unit management. He has serviced over 50 airports across Australia and internationally. He is responsible for ensuring compliance with CASA MOS 139 regulations, overseeing airport manual suites, documents, and procedures, including Safety Management Systems, Aerodrome Manuals, and Wildlife Hazard Management Plans.

Chris ensures BA Aviation remains compliant and competent by preparing management plans, conducting aviation document control, performing risk assessments and audits, delivering wildlife hazard management training, and engaging with stakeholders. His expertise includes active wildlife mitigation, wildlife hazard assessments, development of wildlife hazard management plans, and implementation of standard operating procedures.

He also has experience in preparing Foreign Object Debris (FOD) Management Plans and reviewing infrastructure, building designs, waste management strategies, and operational procedures. Chris has provided expert advice and services to airports across Australia, the Middle East, and the South Pacific.

With a strong understanding of compliance, regulations, budgets, and legislative requirements, Chris effectively manages multiple contracts and nationwide projects. His professional contributions have been recognised through industry conferences and collaborations.

Qualifications and Memberships

- Bachelor of Science (Honours)
- Aviation Management Graduate Cert
- Safety and Lead Auditors Course
- ARN, ASIC, AROC, DCAC (Department of Defence), ARO & WSO.
- CASA drone accreditation
- Alliance Airlines approved GHA trainer
- Venomous snake handling
- Weapons A, B & H
- Chemical use Cert
- Wildlife Management Training

- 4WD Certificate
- Australian Construction White Card

Key Skills

- Airport Management
- Airport Compliance Auditing
- Project Management
- Wildlife and Bird identification
- Oversight of airports Aerodrome Manuals, SMS, Risk Matrix, TSP and AEPs.
- Leading, mentoring, management, training, and resourcing of airport managers, ARO's and WSO's Australia-wide.
- Training and development of staff to adhere to CASA 139 MOS compliance and respond to the Aerodrome Emergency Plan (AEP).
- Management of multiple simultaneous contracts and staff at projects Australia-wide.
- Management and leadership of WSO and ARO business unit
- Strong leadership and development skills
- Tendering

Career summary

Aviation Operations Manager / Fauna Business Manager	BA Aviation Biodiversity Australia	2024 - Current
Manager	Jasko Airport Services	2019 - 2024
Airport Manager	AVMIN, Moomba, Ballera Airports	2018 - 2019
Aviation Consultant	Avisure	2012 - 2018

Professional Experience

Aviation Operations Manager

BA Aviation QLD (2024 -Current)

- Data management
- Wildlife surveys
- Risk assessment
- Compliance Management
- Wildlife trend and KPI analysis
- Habitat and behaviour survey
- Development of WHMP
- Development of off-airport land-use plans
- Development of SOPs
- Airport Audit
- ARO Training
- ARO Competency Assessment
- Off-airport land-use assessment
- NASF Survey
- SMS presentation and stakeholder engagement
- DNA and wildlife strike analysis
- Significant Strike Investigations
- Landscape management

Fauna Business Manager

Biodiversity Australia QLD (2024 -Current)

- Personnel rostering for department and job scheduling
- Client liaison, main point of contact to manage each contract/ job.
- Monthly budget management
- Business Development to expand department opportunity and re-engagement.
- Undertake ecological surveys and compliant reporting.
- Ensured no endangered animals were injured or severely disturbed through clearing activities.
- Data collection to satisfy legislation and approval conditions.
- Species identification – Flora and Fauna (native and introduced)
- Liaised with onsite workers and personnel to ensure daily pre-start checks, forms completed, inductions are undertaken as per the project permits.
- Report senior reviewal and editing.
- Fauna potential occurrence assessments
- Undertake wildlife callouts.

Manager

Jasko Airport Services QLD (2019-2024)

- Responsible for Safety Management systems
- Contract compliance to the industry award.
- Wildlife Hazard Assessments
- Accident and Incident Investigation
- Risk assessment modelling.
- Standard Operating Procedures
- Management of multiple simultaneous contracts and staff at projects Australia wide
- Training and development of staff

Relevant Project Experience

Customer Matrix (and more)	Airport Manager	WHMP Services	NASF Assessment	WHM Training	ARO/WSO
Australian Airports					
Adelaide Airport		1-Year	1-Year		
Ballina Byron Gateway Airport		5-Years	5-Years	2-Years	6-Months
Gold Coast Airport		6-Years	6-Years	6-Years	3-Months
Brisbane Airport		3-Months		1-Year	
Bankstown Airport		2-Year	2-Year		
Camden Airport		2-Year	2-Year		
Roma Airport		2-Years	2-Years		6-Months
Moranbah Airport		2-Years	1-Year		1-Year
Toowoomba Wellcamp Airport		2-Years	2-Years		1-Week
Toowoomba City Aerodrome	1-Year	1-Year	1-Year	2-Years	2-Years
Moomba Airport	1-Year	1-Year	1-Year		
Ballera Airport	1-Year	1-Year	1-Year		
Kowanyama Airport	3-Months				
Coffs Harbour Airport		1-Year	1-Year		
RAAF Amberley		2-Years			2-Years
RAAF Scherger		1-Year			
RAAF Jervis Bay		1-Year			
Rockhampton Airport		5-Years	5-Years	2-Years	
RAAF Edinburgh					1-Year
Mackay Airport		5-Years	5-Years	3-Years	
Proserpine Airport		5-Years	5-Years	1-Year	
Townsville Airport		1-Year	1-Year	1-Year	
Mt Isa Airport		1-Year	1-Year	1-Year	
Shellharbour Airport		1-Year	1-Year	1-Year	1-Year
Gove Airport		1-Year	1-Year	1-Year	1-Year
Lord Howe Island		1-Year	1-Year	1-Year	
Longreach Airport				1-Year	
Bendigo Airport		1-Year	1-Year	1-Year	
Halls Creek Airport		1-Year	1-Year	1-Year	
Port Hedland International Airport		3-Years	3-Years	3-Years	
Broome International Airport		1-Year	1-Year		
Paraburdoo Airport		3-Year	3-Year		
Lismore Airport		2-Years	2-Years	1-Year	
Grafton Airport		2-Years	2-Years	2-Years	
Cloncurry Airport		1-Year	1-Year		
Karratha Airport		3-Year	3-Year		
Denmark Airport			1-Year		
Bundaberg Region			1-Year		
Launceston Airport		2-Years			
Archerfield Airport	1-Year	1-Year	1-Year	1-Year	
Broken Hill Airport		1-Year	1-Year		
Overseas Airports					
Bahrain International Airport		1-Year	1-Year	1-Year	
Wellington International Airport		1-Year	1-Year		
Tuvalu International Airport		1-Year	1-Year	1-Year	

Our people

Stuart Butler

Business Manager Aviation

Professional profile

Stuart Butler is a highly skilled and experienced environmental professional and has worked for Biodiversity Australia since October 2019. During this time Stuart has been integral member of the team including delivery one of Australia’s largest linear infrastructure projects. Stuart has worked in high-risk environments and has a demonstrated meticulous commitment workplace health and safety regulations. Stuart has extensive training in health, safety and policies, procedures, and legislation. He holds a range of licences and certificates including ARO certificate from AAA, Venomous Snake Handling, Chemical Accreditation, CPR and First Aid.

Stuart is responsible for the day to day running of BA’s Aviation division including schedules, budgets, HSE compliance, provision of expert advice and undertaking senior technical review on all reporting elements. As part of his current role, he also conducts field works including daily fence inspections, runway inspections, wildlife control, reporting any safety issues, recommendation of NOTAMs and other duties as required as the airfields primary airside operator.

Stuart has received personnel commendation by Defence for his operational works supporting the Australian RAAF deployment. In addition has been formally recognised for his contribution to the Australian Aviation industry for reducing wildlife strike risk receiving commendation as joint runner up at the 2022 Australian Aviation Wildlife Hazard Group Awards.

Qualifications, Certifications and Memberships

- Diploma of Conservation & Land Management, Charles Darwin University
- Construction Industry White Card
- Open Driver’s Licence
- First aid and CPR training
- RIIVEH305E Operate and maintain a four-wheel drive vehicle
- AHCCHM307, AHCCHM304 AUSCHEM Chemical Accreditation
- High Risk Forklift Ticket
- Venomous Snake Handling Certificate
- Currently in process: A-ROC, Defence pass, WSO certification and firearms licence.

Career summary

Business Manager Aviation	Biodiversity Australia	2023 - Present
Wildlife Management Officer	Biodiversity Australia	2020 - Present
Fauna Spotter/Catcher	Biodiversity Australia	2019-2020

Professional Experience

Business Manager Aviation

Biodiversity Australia, (2023- Current)

- Oversee Biodiversity Australia's allocation of WMO for Airside wildlife management.
- Works in accordance with department budgets and schedules,
- Project Manager ensuring all works in alignment with ISO Quality, Enviro and Safety standards.
- Liaise with multiple stakeholders within defence, PDS, EMOS and civilian,
- Provide senior review on department data and reporting including quality control for records of wildlife interactions, presence, and hazards.
- Overseas mobilisation to support several Australian Defence Force exercises as a senior technical resource.
- Undertake on and off field surveys in preparation for the AWHMP minor and major updates.
- Identify potential high-risk situations.
- Conduct works in the field such as removal of high-risk wildlife from airside areas.
- Undertake standardized wildlife and flying-fox surveys.
- Operation and maintenance of 4WD vehicle.
- Avian and wildlife identification.

Wildlife Management Officer

Biodiversity Australia, (2020- 2023)

- Airside wildlife management, including active management of wildlife in an airside environment.
- Liaise with multiple stakeholders within defence, PDS, EMOS and civilian,
- Monitor and record wildlife interactions, presence and hazards.
- Identify high-risk situations and communicate hazards via radio.
- Remove high-risk wildlife from airside areas.
- Undertake standardized wildlife and flying-fox surveys.
- Operation and maintenance of 4WD vehicle.
- Avian and wildlife identification.
- Undertake callouts for trapped wildlife.

Fauna Spotter/Catcher

Biodiversity Australia, (2019- 2020)

- Undertake pre-works pre-clearance surveys to identify presence of habitat features
- Work alongside heavy machinery and assets while managing wildlife
- Proficient in radio communications between operators and other contractors
- Gained familiarity in handling practices for a variety of mammals
- Capture and release of fauna, including venomous snakes
- Relocate potential and active habitats
- Setting up fauna protection zones & procedures to prevent wildlife injuries
- Fit for long, physical work days
- Liaison with project stakeholders and clients

Karl Robertson

Principal Consultant and Senior Business Manager



Professional profile

Karl is a BAM Accredited Assessor BAAS21022 with over 10 years' experience in Ecological Consulting throughout NSW, QLD & NT. Through this time Karl has played a lead role in an extremely broad service offering in the fields of; aviation wildlife hazard management, ecological impact assessment; rehabilitation and ecological restoration; vertebrate pest management; human wildlife conflict resolution (specialising in Flying-foxes and Macropods); and vegetation management.

Throughout his career, Karl has worked on a large number of exceptionally complicated and challenging projects testing his skills technically, politically and legally with his unrelenting drive, work ethic, client focus and commitment to objectivity underpinning his success.

Karl continues to gain an holistic knowledge of Australian Ecology. In doing so, he has developed advanced survey and assessment skills. He is able to survey for and identify the full complement of Australian native and exotic fauna and flora with extensive experience in all state and federal survey guidelines for flora and fauna.

Karl has demonstrated his ability to undertake native and exotic flora survey on numerous occasions and can readily identify NSW Endangered Ecological Communities, QLD Regional Ecosystems and Federal - Threatened Ecological Communities. Karl has ample experience working in Australia's east coast environments from Sydney to Cairns as well as inland environments throughout the Brigalow Belt, Brigalow Belt South and Cobar Peneplain Bioregions.

Through his report preparation, Karl has developed a broad understanding of both State and Federal Legislation, having prepared hundreds of Wildlife Hazard Assessments, Ecological Assessments, Monitoring and Audit Reports, Seven Part Tests, MSES, EPBC Act MNES, BDAR's, as well as the preparation of Reviews of Environmental Factors, Vegetation Management Plans and countless Control Plans for Exotic Flora including the regionally adopted eradication plans for Class 1 noxious weeds in Northern NSW.

To compliment his report preparation, Karl is also an accomplished spatial analyst with experience in the use of ArcGIS and MapInfo as well as a vast range of data collection software (GBM Mobile, GIS Pro, Weed Map Pro) and hardware (Trimble, iPad, GPS, Toughbook). This allows Karl to undertake in depth analysis of data for impact assessment and allows information to be presented in a very clear and succinct manner for consent authorities.

Karl now leads the Biodiversity Australia's major projects in his role as Principal Consultant and Business Manager which encompasses a range of diverse projects including lead technical advisors to Western Sydney Airport Co for matters of wildlife hazard. His ability to lead the Biodiversity Australia team stems from his core values of integrity, open-mindedness, resilience, comradery, and inclusiveness – particularly with Indigenous Australians.

Qualifications, certifications and memberships

- Bachelor of Environmental Science and Management (Southern Cross University), 2011.
- National Cleared Defence Pass including escort and after hours privileges,
- ASIC Pass
- Chemical users certificate
- Construction Industry Induction OH&S (Whitecard).
- Boat Licence
- Firearms Licence

Career history

Biodiversity Australia – Principal Consultant and Senior Business Manager

August 2015 – Present

GreenCollar Services – Field Ecologist

November 2014 – August 2015

Cumberland Ecology – Ecologist

May 2014- March 2015

Greenloaning Biostudies – Ecologist

May 2014 – November 2014

Relevant project Experience

Date	Project	Role / Key Tasks	Active Mitigation	Risk Assessment	Expert Advice	Field Survey	Training and Upskilling	Policy Development
Wildlife Hazard Assessment								
2023-2024	Expert Advise – Hassel Limited.	<i>Technical Advisor</i> Karl has provided technical advice and review to Hassel Limited relating to the Wildlife Strike Design and corridor Biodiversity Design of Western Sydney Airport – Metro rail Line (SSTOM). He has provided expert technical advice on all aspects concerning Wildlife Hazard within the 10Km project Landscape Corridor Western Sydney Airport new stations and maintenance facility.		✓	✓		✓	
2019-2024	Expert Advise – Western Sydney Airport Co.	<i>Technical Advisor</i> Karl has sat as the lead technical advisor to Western Sydney Airport Co. for over 5 years and has provided expert technical advice on all aspects concerning Wildlife Hazard within 13km of the Western Sydney Airport.	✓	✓	✓	✓	✓	✓
2019 - 2024	Department of Defence – WHMP Development	<i>Technical Advisor</i> Karl sat as the lead technical advisor and senior reviewer in the development of all Wildlife Hazard Management Plans for the Department	✓	✓	✓	✓	✓	✓

Date	Project	Role / Key Tasks	Active Mitigation	Risk Assessment	Expert Advice	Field Survey	Training and Upskilling	Policy Development
		of Defence aviation ports in Northern Territory, Queensland and Southern NSW.						
2021	Expert Advise – Transport NSW	<i>Technical Advisor</i> Karl was engaged Transport NSW and various principal contractors to NSW Transport to undertake a comprehensive review of the proposed landscape designs relating to the M12 upgrades leading to the Western Sydney Airport.		✓	✓	✓		✓
2014 - present	Wildlife Hazard Management RAAF Amberley	<i>Technical Advisor</i> Karl has undertaken a range of services for the Department of Defence at RAAF Amberley over the past 6 years, ranging from expert advice of mitigation through to formal risk assessment.	✓	✓	✓			✓
2015 - 2017	Wildlife Monitoring – Brisbane Airport	<i>Technical advisor</i> Karl provided technical survey and advice services relating to wildlife strike, permits and approvals to Brisbane Airport Corporation through the development of the New Parallel Runway project.			✓	✓		
2017	Expert Advice and Peer Review of Wildlife Hazard – Mackay Airport	<i>Technical Advisor</i> Karl was engaged by Mackay airport to undertake a comprehensive peer review of a wildlife hazard assessment relating to infrastructure upgrades in the vicinity of the airport. He successfully undertook gap analysis of the existing hazard assessment and provided practical solutions to maintain wildlife hazard in the changing environment.		✓	✓	✓		✓
2018 - present	WHMP - Lismore City Council Airport	<i>Technical Advisor</i> Karl successful lead the development of the Lismore City Council Wildlife Hazard Management Plan include stakeholder engagement, report preparation against state and federal statutory considerations including CASA Regs and expert advice.		✓	✓	✓	✓	✓
2019	Wildlife Hazard Assessment – Proposed Development – Karratha Airport	<i>Technical Advisor</i> Karl was engaged by a private proponent to undertake a comprehensive wildlife hazard assessment for development of large aquaculture facility in the vicinity of the Karratha Airport.		✓	✓	✓		✓