



ROYAL AUSTRALIAN AIR FORCE

AIR FORCE HEADQUARTERS

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Mr Nicholas Dowie

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Dear Mr Dowie

SAFEGUARDING AVIATION INFRASTRUCTURE – DISCUSSION PAPER

In response to your Executive Director's invitation to review the Discussion Paper on Safeguards for Airports and the Communities Around Them, Defence offers the following. The input is framed in a manner that covers both general comment on the overall thrust of the document, and specific comment, where individual considerations may have the potential to impact Defence. Defence also understands that any resulting policy will only apply to the federally leased airports, which include Darwin and Townsville as joint-user airfields, and not Defence airfields, which are covered under separate, dedicated legislation and regulation.

General comment

In the first instance, Defence commends your Department for taking the initiative to seek a coordinated approach, across all levels of government, to deal with the inevitable competing interests regarding land use on and off airports. Ultimately, Defence is of the view that aviation operations and associated safety considerations must take primacy over other, commercial interests. Consequently, we welcome any policy initiatives with the potential to better define responsibilities, coordinate government action across all three tiers of government and foster a truly national approach to safeguarding airports and their associated aviation infrastructure. This includes effective statutory planning measures that lend an adequate level of authority to resolve land interface issues between airports and nearby urban developments that have the potential to impact aviation safety.

As regards the incorporation of future safeguarding policies into relevant state and territory legislation, Defence notes that the Discussion Paper does not articulate how this might be achieved. No doubt, the Department's intent is to first determine what should constitute a national policy approach and then determine the optimum method of having that approach reflected in appropriate state/territory legislation. However, Defence suggests that there may be some benefit in identifying the various legislation sets and associated processes for each state and territory, in parallel with policy development, in order that potential policy outcomes can be tailored in a manner that will facilitate the required level of harmonisation across the various levels of government. Defence appreciates that such an undertaking will present challenges, given the likely disparate provisions between state and territory jurisdictions. Notwithstanding, such an approach could provide a better picture of the actual scope of the task than may currently exist.

Specific comment

Planning for compatible development. Defence supports the Department's initiative to undertake a review of the ANEF system for land use planning purposes and agrees that the current system does not adequately illustrate current and future noise impacts around airports. As discussed in the Defence response to the Aviation Green Paper, current and future military aircraft movements are a function of operational necessity and cannot be forecast with the same degree of accuracy as civil aircraft movements. Furthermore, the ANEF system also has significant limitations in accommodating Defence specific activities such as formation flying and the unpredictability and intensity of military aviation operations. From the perspective of Defence, sole reliance on the ANEFs produced for military airfields, as a basis for making long-term decisions on land use, could compromise the operational integrity of these airfields in the future. Consequently, and for the information of your Department, Defence is progressing its own study into alternative noise assessment and forecasting methodologies to better define and predict the noise impacts of current and projected capabilities.

Protection of operational airspace. Defence is appreciative that the Discussion Paper has flagged to wider industry that military airfields are protected under the Defence (Areas Control) Regulations. While these Regulations are specific to Defence airfields, and do not apply to the airfields covered under the discussion paper, Defence would appreciate some further amplification to the effect that the Regulations permit Defence to override any development approvals that may infringe operational airspace and to enforce building height restrictions in the vicinity of its airfields.

Wildlife hazards. In the development of policy pertaining to wildlife hazards, in particular the dangers associated with bird-strikes, Defence recommends that your Department considers Queensland State Planning Policy, which provides the blueprint at military airfields for assessing the suitability or otherwise of planned land use. The Policy, *'01/02 Development in the Vicinity of Certain Airports and Aviation Facilities,'* contains comprehensive principles on restricted development and development requiring mitigation measures within certain distances from airfields. From the perspective of Defence, the Queensland Policy would provide a sound basis for national policy development in regard to bird-strike hazards.

Wind turbines. The Discussion Paper correctly identifies the Defence desire to have visibility of all wind turbine developments with the potential to present hazards to military flying. The Paper also notes the effect that wind turbines can have on radar performance and their potential to cause electromagnetic interference at certain frequencies. Consequently, Defence preference is for all wind turbine developments to be subject to mandatory reporting and all wind turbine developments within line-of-sight of Defence installations to be subject to some form of mandatory approval process. In addition, and as part of the reporting process, Defence would wish to see all developments recorded by latitude and longitude and heights recorded in terms of above mean sea level (AMSL) and above ground level (AGL).

Other obstructions. Although not specifically mentioned in the Discussion Paper, other obstacles such as transmission towers and high tension power lines also have the potential to impact aviation safety. Given that wind turbines further afield than immediate airport environs have been included in the Paper, Defence requests consideration be given to the reporting of these other obstacles. Defence preference would be for structures in excess of 200 feet AGL to be subject to mandatory reporting. Given the number of these structures already in existence, such an outcome may not be achievable. Notwithstanding, given the potential hazard that they present to low flying aircraft, Defence would appreciate the further examination of this initiative.

Gas-fired power stations. As your Department is no doubt aware, the construction of gas-fired power stations in the vicinity of airfields has the potential to present a hazard to overflying aircraft from the vertical jet-efflux produced by the associated turbines. Indeed, stations in both Victoria and Queensland, which were injudiciously sighted without reference to overlying airspace, have retrospectively necessitated alterations to instrument approaches and the control area steps at these locations. Defence suggests that the current regime, which appears to take little account of the potential impacts on aviation, should be the subject of some scrutiny to ensure that aviation activity is a prime consideration during the planning and approval processes.

Public safety zones. Defence commends the Department for identifying a list of developments that should be restricted at either end of airfield runways, but suggests that such developments be re-classified as 'recommended non-permitted uses' as opposed to 'restricted uses,' as the latter may encourage existing land owners to seek compensation for the loss of development rights. Once again, Defence recommends the use of the Queensland State Planning Policy referenced above, in regard to the creation of public safety zones at Darwin and Townsville, where 'recommended non-permitted uses' would be less likely to attract claims for compensation than a regime that imposes blanket prohibition.

In conclusion, please accept my thanks for the consideration afforded by your Department in this matter, particularly with respect to the level of consultation that accompanied the drafting of the Discussion Paper. Defence staff will continue to be available to assist your Department should further consultation be necessary.

Yours sincerely

G.C. BROWN
Air Vice-Marshal
Deputy Chief of Air Force

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