

KERR Donna

From: Duncan Bird <duncan@archerfieldairport.com.au>
Sent: Friday, 6 September 2019 6:21 PM
To: Safeguarding <safeguarding@infrastructure.gov.au>
Cc: Graham Madden <graham@archerfieldairport.com.au>; Rod Parry <rod.parry@archerfieldairport.com.au>
Subject: RE: Acknowledgement - NASF Implementation Review submission [SEC=UNCLASSIFIED]

Thanks for your response Donna,

The email I received from the Department in regards to Guideline I included the following information: *"The Department's view is that paragraphs 23 and 24 are not inconsistent, but that the word 'typically' should have been added (i.e. "PSA are typically based on the landing threshold..."). The wording of the guideline may be updated at a later time once there has been an opportunity for any further issues to be identified during implementation."*

The issue we have is that our runway landing and take-off positions are in different locations at the eastern end, so depending on whether the PSA starts at the landing position, or if it starts at the take-off position, makes a significant difference to which houses are/aren't include in the PSA. QLD Transport & Main Roads (TMR) are currently starting the PSA from the landing position in their planning maps as far as I'm aware. This doesn't seem to me to be consistent with the NASF objective to *"...improve safety outcomes by ensuring aviation safety requirements are recognised in land-use planning decisions"*. Could you please clarify if it's the intention of the NASAF Guideline I for TMR to continue this practice, or if we should be informing TMR that they should be starting their PSA from the take-off position instead?

In regards to the impact of NASF on land use planning decisions, the only other thing I would comment on is that the current ANEF system (in relation to Guideline A) encourages Airport's to develop standard ANEFs (with smaller noise footprints when compared with the much larger ultimate capacity ANEFs) in order to avoid costs associated with developments within airport land and close to noisy movement areas. If the Airport itself was exempt from this Guideline, then it wouldn't be penalised for developing ultimate capacity ANEFs, and the community would be given a truer indication of long-term future noise impacts from airport operations.

Regards,
Duncan

Duncan Bird
Director



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From: Safeguarding [<mailto:safeguarding@infrastructure.gov.au>]
Sent: Thursday, 5 September 2019 9:46 AM
To: Duncan Bird <duncan@archerfieldairport.com.au>; Safeguarding <safeguarding@infrastructure.gov.au>
Cc: Graham Madden <graham@archerfieldairport.com.au>; Rod Parry <rod.parry@archerfieldairport.com.au>
Subject: Acknowledgement - NASF Implementation Review submission [SEC=UNCLASSIFIED]

Good morning Mr Bird

Thank you for again submitting these comments relating to Guidelines B and I of the National Airports Safeguarding Framework (NASF). In relation to your comments regarding Guideline I, the Department provided an email response to clarify the issue in March of this year.

Noting that the Terms of Reference (outlined on the Review webpage) include questions relating to whether the NASF has been/is being embedded in legislation/regulations; is reflected in policy, guidance and any other planning advice; or what impediments (if any) have there been to full implementation. Are there any additional comments you wish to make as part of the Implementation Review?

Regards

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From: Duncan Bird <duncan@archerfieldairport.com.au>
Sent: Wednesday, 4 September 2019 10:44 AM
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Cc: Graham Madden <graham@archerfieldairport.com.au>; Rod Parry <rod.parry@archerfieldairport.com.au>
Subject: RE: National Airports Safeguarding Framework - invitation to provide submission [SEC=UNCLASSIFIED]

Hi Jim,

Thanks for the opportunity to comment on the NASAG guidelines.

In relation to **NASAG Guidelines I - Public Safety Areas**, it appears to me as though paragraph 23 contradicts the recommendation in para 24.

Para 23 discusses the statistical chance of an accident based on the number of aircraft movements and the distance from the critical take-off and landing points. Whereas para 24 only considers the landing point to be of concern. Archerfield has non-coincident landing and take-off ends at the eastern end of the main runway due to a displaced threshold. I believe many other airports around the country also have non-coincident ends. In theory, if para 24 was adopted as is, it would be possible to have a PSA wholly contained within a runway strip if the threshold is displaced by a large enough distance. This doesn't appear to meet the intent of PSAs, as they should also consider aircraft that are taking off, not just landing. Do you know if this has been considered by those that drafted the guideline?

In relation to **NASAG Guidelines B – Building-induced windshear**, it appears to me as though the guidelines have been drafted based on findings from Code 4 airports, in relation to Code 4 aircraft operations.

There appears to be very little consideration of how the Guidelines impact Codes 1, 2 or 3 airports or the types of aircraft that operate from them. There also appears to be very little consideration of the impact to surrounding landholders and the disproportionate costs that the guidelines place on smaller (Codes 1,2 & 3) airports, in comparison to the Major (Code 4) airports. This is likely to stunt the growth of the smaller airports.

For example, for proposed structures up to 12m in height, the areas subject to the 1:35 rule encompasses the majority of the airport's total footprint on the majority of smaller airports across Australia. This

compares to Code 4 airports, where only a small portion of the airports footprint is effected. On such airports a 12m tall structure is unlikely to ever be impacted by the 1:35m rule due to the vastly increased distances between runway centreline and the nearest permissible building. Many hangars as low as 5m in height currently exist within close proximity to the runways of smaller airports across Australia, and according to Guideline B, would be subject to the 1:35 rule if they were built today. Wind specialist studies costing between \$15,000-\$30,000 significantly add to the overall cost of a small development such as these. Guideline B would make a significant portion of them unviable if proposed today.

Additionally, a significant portion of the 900m extension of the centreline continues well beyond the airport boundaries and onto neighbouring land for the smaller airports. When applied to these areas of land, Guideline B stipulates that objects above 3m in height (such as a house) and within 105m either side of the centreline extension ($3m \times 35 = 105m$), have the propensity to cause wind shear on approaching aircraft and would therefore be required to obtain wind specialist assessment prior to construction. I struggle to see how a house in this location has the propensity to cause wind related issues to a small training aircraft on approach that is approximately 30m above it and landing approximately 1km away from the house.

Is the above scenario likely to cause wind shear/turbulence issues to an aircraft 30m above it? If not, should Guideline B be reviewed to consider how it impacts Codes 1, 2 and 3 airports and the surrounding landholders?

Thanks for your consideration of our comments and please don't hesitate to contact me if you have any questions.

Kind regards,
Duncan

Duncan Bird
Director

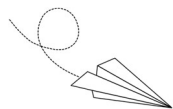


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