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General Manager

Aviation Environment

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GPO Box 594

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Dear Sir / Madam

**SUBJECT >> REVIEW OF THE NATIONAL AIRPORTS SAFEGUARDING
FRAMEWORK (NASF) – TOWNSVILLE CITY COUNCIL**

I refer to the invitation to make comment on the National Airports Safeguarding Framework (NASF) Implementation Review.

Townsville City Council wishes to advise that it has undertaken a review of the National Airports Safeguarding Framework (NASF) and, in particular, the proposed Implementation Review and notes the following.

1. Whether the NASF has been/is being embedded in legislation/regulations?

Following a review and comparison between the NASF and the Queensland Government's State Planning Policy, July 2017, council believes that the NASF has been effectively included in the State Planning Policy, July 2017, in particular the Strategic airports and aviation facilities component of the policy.

2. Whether the NASF is reflected in policy, guidance and any other planning advice?

With respect to the National Airports Safeguarding Framework (NASF) being reflected in policy guidance and any other planning advice, it appears that much of the information included in the NASF framework is already contained within Queensland's State Planning Policy, July 2017. In turn, the relevant components of the State Planning Policy, July 2017 have been incorporated into the Townsville City Plan (2014) (including those relating to Strategic airports and aviation facilities).

3. What impediments (if any) have there been to full implementation?

As part of the overall development of the Townsville City Plan (2014), and subsequent amendments to the plan, council had no impediments when implementing the relevant NASF framework given the relevant information is already contained within the State Planning Policy, July 2017 (and the previous State Planning Policy July 2014).

From a Queensland perspective, one issue that Townsville City Council wishes to bring to the attention of the department relates to requirements and timeframes that are associated with making an amendment to a planning scheme. Making amendments to planning schemes (in terms of a statutory guideline) is very lengthy and can take 12 to 24 months to complete. Therefore, with respect to two outstanding items yet to be incorporated into the Queensland planning system, that being:

- Managing the Risk of Building Generated Windshear and Turbulence at Airports (Guideline B); and
- Protecting Strategically Important Helicopter Landing Sites (Guideline H);

once these above guidelines have been finalised council notes that there will be some time before these aspects will be incorporated into the planning scheme.

4. The level of awareness, consideration and use of the NASF principles and Guidelines A to I by relevant government agencies, public and private airport operators.

From a local government perspective, in 2014, Townsville Council commenced a new planning scheme entitled the Townsville City Plan (2014). As part of the development of the new planning scheme, council ensured that all state interests were addressed, including those relating to strategic airports and aviation facilities. Moving forward, if any of the NASF principles and guidelines were to change council would consider amending the planning scheme accordingly if required.

5. The level of industry and community stakeholder awareness and familiarity with the NASF framework and guidelines.

In terms of the level of industry and community stakeholder awareness and familiarity with the NASF framework and guidelines, given that the relevant components of the NASF framework and guidelines have been included into the State Planning Policy July 2017, Planning for infrastructure, Strategic airports and aviation facilities, the development industry are aware of NASF framework and guidelines.

In addition, the Townsville Airport holds the quarterly Community Aviation Consultation Group Meeting which brings together a wide range of different organisations including Air Services Australia, Department of Defence, Townsville City Council, CASA as well as Local, State and Federal Elected Representatives. The

Community Aviation Consultation Group Meeting provides a forum for the NASF framework and guidelines to be discussed. Whilst the Community Aviation Consultation Group Meeting enables the discussion of airport operational matters including the NASF framework and guidelines, the wider Townsville community probably would not be aware of the NASF framework and guidelines nor that they are included into the State Planning Policy July 2017. However, council does question whether the general public need to be aware of the NASF framework and guidelines given the inclusion of the principles into the planning scheme.

6. Any specific case studies to illustrate the impact of NASF on land use planning decisions.

At this point in time, Townsville City Council does not have any specific case studies to illustrate with respect to the impact of NASF on land use planning decisions.

General comment

It is noted that on Page 2, Context, Item 10 of the Principles – National Airports Safeguarding Framework document identifies that: “Military airfields support both military operational and training activities, in order to fulfil critical national security requirements. They may also support general aviation when not in active military use. Military airfields also contribute significantly to the economies of the regions where they are located. References to airports in this Principles document, is intended to also include military airfields”.

It is noted that the Townsville Airport is a “joint user” airport facility that is presently owned by the Department of Defence and part of the site has been leased to Townsville Airport Limited for passenger operations. Council believes that the framework should acknowledge those airports that have joint use arrangements, given that there are a number of these operating within Australia.

Overall, it would be beneficial if all the relevant guidelines (A – I) included maps or diagrams that diagrammatically (within the document itself) identify what specifically the guideline is trying to achieve rather than as an attachment.

Should you have any queries please do not hesitate to contact Senior Planning Officer, Cameron Finter, on (07) 4727 9502 or email Cameron.finter@townsville.qld.gov.au.

Yours sincerely

B. Bignoux

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