



Dedicated to a better Brisbane

12 November 2019

Mr Jim Wolfe
General Manager
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
GPO Box 594
CANBERRA ACT 2601
safeguarding@infrastructure.gov.au

Dear Mr Wolfe

Thank you for the opportunity to make a submission on the National Airports Safeguarding Framework (NASF) – Implementation Review. Brisbane City Council (Council) welcomes the opportunity to provide comments and raises the following matters for your consideration.

Council recognises that a number of the guidelines in the NASF are currently implemented in Queensland through the *State Planning Policy July 2017* (SPP). Regarding the effectiveness of the guidelines, your attention is drawn to the provisions for *Guideline 1: Managing the Risk in Public Safety Areas at the Ends of Runways* (the guideline). While the provisions relating to public safety areas (PSAs) of the SPP and the guideline are incorporated into *Brisbane City Plan 2014* (City Plan), concerns are raised about how PSAs are being implemented and the manner in which the assessment of risk to public safety may be undertaken for a change to, or intensification of, a land use within a PSA.

The issue has become apparent in relation to Archerfield Airport (the airport), which is situated within the City of Brisbane and has a large proportion of its PSAs located outside the airport boundaries. The location of the PSAs directly impacts upon land under Council's control, namely Mortimer Road Park to the east, currently comprised of sporting fields and associated clubhouse facilities, and a significant environmental and waterway corridor to the west. The area to the west is the subject of a Council project currently underway called Oxley Creek Transformation. Both these areas are undergoing master planning as Council looks for ways to enhance their use as areas for passive, active and environment-based recreation opportunities for current and future populations. To the north and south of the airport, the land within the PSAs is mostly privately owned and zoned for industrial uses.

The provisions set out in the guideline and implemented through the SPP and City Plan seek to limit the number of people living, working or congregating within PSAs to reduce the safety risk to the community around the airport. The determination of PSA boundaries follows a highly-technical and complex process, factoring in a number of considerations including the acceptable levels of safety risk at different locations from the end of the runways. However, the methodology used to determine PSAs adopts a 'one size fits all' approach. It does not facilitate a tailored approach to consider the risk factors that would only apply to the movement of aircraft to and from Archerfield Airport.

In the context of the master planning being undertaken for the Council-controlled land adjacent to Archerfield Airport, this is proving to be problematic. There are no clear parameters around what the level of risk is to the community for the existing recreational and environmental uses based on current aircraft movement. Without this, it has been difficult to determine to what extent the existing uses can be intensified and still remain compliant with the risk thresholds identified in the guideline.

It is Council's opinion that the Australian and Queensland Governments have placed the responsibility for implementing the guideline and SPP on local governments without thoroughly considering how the provisions can be interpreted or administered. The current provisions in the guideline do not provide any clarity to assist Council in determining the appropriateness or intensification of land uses within PSAs. The guideline discusses the proactive approach in Queensland through the SPP, but from a practical point of view, neither the guideline nor the SPP provide any easily understood provisions about how to determine current and future risk to public safety.

The guideline does not provide any parameters around what represents a significant increase in the number of people living, working or congregating in a PSA, or what determines an acceptable level of increase involving the bulk storage of hazardous materials within a PSA. The guideline should be amended to include detailed provisions that will assist Council to easily measure the exposure to, or increase of, risk to public safety when assessing the change of a land use in a PSA.

It should be noted that Council staff have previously raised this matter with Queensland Government representatives. In these discussions, Council officers were advised that determining the level of risk associated with a change to, or intensification of, a land use is a matter for Council to decide regarding what level of risk it is prepared to accept. Given the ambiguous and technical nature of assessing public safety risk for PSAs, Council is requesting that the guideline be amended by providing a methodology which is easier to understand and involves provisions that can be readily integrated into planning schemes for the purposes of managing development.

Based on the information provided on page 14 of the guideline, it is encouraging to learn that the Queensland Government is reviewing the method by which PSAs are to be determined. Having regard to the above comments, this review should also consider including criteria that makes it easier for Council to assess the level of risk associated with a change of land use in PSAs.

Council supports a review of the guideline and recommends that changes be made that provide a tailored approach to determining the current and future risks to public safety in PSAs for airports. This review should be prepared by the Australian and Queensland Governments, those being best placed to understand the broader issues for the aviation industry. Local governments should also be consulted for any proposed changes which may have implications for land use. The guideline should also be amended to provide a simpler methodology that can be used by local governments to undertake risk assessments involving the change to or intensification of land uses within a PSA.

Should you require any further information about Council's submission, please do not hesitate to contact Mr Michael Madden, Senior Urban Planner, Partnerships Team, Neighbourhood Planning and Urban Renewal, City Planning and Economic Development, City Planning and Sustainability, on (07) 3178 2088, or via email at Michaelk.Madden@brisbane.qld.gov.au.

Yours sincerely



Colin Jensen
CHIEF EXECUTIVE OFFICER