

22 November 2019



General Manger
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
PO Box 594
CANBERRA ACT 2601

Dear Sir/Madam

Queensland Airports Limited (QAL) is the owner and operator of Gold Coast, Longreach, Mount Isa and Townsville Airports. QAL has carried out a review of the National Airports Safeguarding Framework (NASF) which has been released for consultation.

We believe the delivery of air services that connects communities and plays a significant role in facilitating city and regional economies is critical for future growth. Therefore, we strongly support and agree the need to enhance the current and future safety, viability and growth of aviation operations in Australia. The review of the NASF is timely and we have provided our comments and/or offer recommendations within the below.

1. Cross-jurisdictions

As you would be aware the Gold Coast Airport (GCA) lease straddles the border between New South Wales and Queensland within the local government areas of City of Gold Coast Council and Tweed Shire Council. Therefore, all developments that impact on GCA's aviation operations and triggers a development application are reviewed by GCA. However, the operational airspace information included in Tweed's LEP is limited as opposed to the information contained in Gold Coast's planning schemes and this is of concern. It is acknowledged the councils are in cross-jurisdictions however, the aviation operational matters are the same.

Recommendation

It is recommended that it is mandated that all Councils have a minimum level of operational airspace information in their land use planning documents and mapping on their websites to ensure such is readily available for all users. A good example of operational airspace information is captured in the *Queensland State Planning Policy (SPP) under the Strategic airports and aviation facilities*.

2. Private Certification

In some cases, dwellings on the Gold Coast that are located within operational airspace are being approved by private certifiers (that do not trigger a development application) without assessing the development against the aviation provisions of the planning scheme.

Recommendation

- There is a mandated level of assessment or guidance material for development within operational airspace for single detached dwellings (OLS & ANEF).

- Training is rolled out to the Australian Institute of Building Surveyors because it appears the level of industry awareness and familiarity with NASF framework and guidelines is limited in some cases.

3. Guideline B: Managing Building-Generated Windshear and Turbulence

It would be beneficial for CASA to consult with industry to develop an agreed standard format of the safety advice provided on windshear and turbulence. It may also be beneficial to include this standard format within the guideline.

We appreciate the opportunity to provide feedback on the NASF. Should you require further information, please don't hesitate to contact Nick Tzannes on 0407 55891291.

Yours sincerely,



Carl Bruhn

Executive General Manager Property and Infrastructure
Queensland Airports Limited

