

27 November 2019

Our Ref: 2019/445275  
File No: 2019/445275-01

Jim Wolfe  
Chair  
National Airports Safeguarding Advisory Group  
Department of Infrastructure, Transport, Cities and Regional Development  
GPO Box 594  
Canberra ACT 2601

By email: [safeguarding@infrastructure.gov.au](mailto:safeguarding@infrastructure.gov.au)

Dear Jim,

### **National Airports Safeguarding Framework Implementation Review**

Thank you for the opportunity to provide input to the Implementation Review of the National Airports Safeguarding Framework (NASF).

The NASF Guidelines are relevant for land use planning in the City of Sydney, with Sydney Airport, Defence sites and strategic helicopter landing sites located within and nearby to the local government area.

To assist with the Implementation Review, the City has reviewed the NASF Guidelines with reference to internal development assessment and strategic planning processes.

Planners at the City are familiar with the need to consider Australian Noise Exposure Framework (ANEF) contours for sensitive development, and that buildings proposed to penetrate Obstacle Limitation Surfaces (OLS) and Procedures for Air Navigation Services – Aircraft Operations (PANS-OPS) limits are referred to Sydney Airport for concurrence. Likewise, these considerations are factored into strategic planning for height limits and land uses.

Major development applications are required to provide an aeronautical impact assessment report, which is provided to Sydney Airport to aid in their assessment of a referral. These reports largely deal with airspace intrusion, and may also cover the topics of other NASF Guidelines, such as lighting (including construction lighting), windshear and the potential for interference with communication, navigation and surveillance (CNS) facilities. However, the City does not have internal expertise about aeronautical impacts, and the only referral pathway is to Sydney Airport.

Development applications will not necessarily be referred to Sydney Airport unless a proposed structure will penetrate the OLS or PANS-OPS surfaces. Land uses that attract wildlife, development that may interfere with CNS facilities located in the council area and structures that may breach the airspace of strategically important helicopter landing sites (SHLS), such as hospitals, are generally not referred.

The NASF Guidelines include considerations for strategic planning and development assessment in all local government areas, as well as state significant development sites

and precincts, and complying and exempt development. The City recommends the NSW Department of Planning, Industry and Environment is best placed to assess the need, scope and methods for better implementing NASF Guidelines in the NSW planning system. Any outcomes implemented through a state environmental planning policy (SEPP) or amendment to the Standard Instrument LEP would be more consistently applied across council areas and all development approval pathways.

The City is open to working with the National Airports Safeguarding Advisory Group further on the Implementation Review. If you would like to discuss this matter further, please contact Jarrod Booth, Planner on 02 9288 5963 or email [jbooth@cityofsydney.nsw.gov.au](mailto:jbooth@cityofsydney.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read 'GJahn', with a large, stylized flourish at the end.

**Graham Jahn AM**  
Director  
City Planning Development and Transport