



Queensland
Government

Office of the
Director-General

Department of
Transport and Main Roads

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Mr Jim Wolfe
General Manager
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
GPO Box 594
CANBERRA ACT 2601

Dear Mr Wolfe

The Queensland Government welcomes the opportunity to comment on the National Airports Safeguarding Advisory Group's review of the implementation of the National Airports Safeguarding Framework (NASF).

The state recognises the key role strategic airports play in facilitating economic growth in Queensland and implements the NASF via the State Planning Policy, a statutory instrument under the *Planning Act 2016*. Please find enclosed Queensland's response to the terms of reference for the review.

If you require further information, please contact Mr Randall Fletcher, Executive Director (Transport System Management), Department of Transport and Main Roads, by email at randall.l.fletcher@tmr.qld.gov.au or telephone on (07) 3066 7166.

Yours sincerely

Mike Stapleton
Acting Director-General
Department of Transport and Main Roads

Queensland comments: National Airports Safeguarding Framework implementation review 2019

Terms of reference element	Comment			
<p>...whether the NASF has been/is being embedded in legislation/regulations</p>	<p>Queensland implements the National Airports Safeguarding Framework (NASF) via the State Planning Policy (SPP), a statutory instrument under the <i>Planning Act 2016</i>. Under the Act, each local government planning scheme needs to set out integrated state, regional and local planning and development assessment policies for an entire local government area. The SPP supports this by setting down the state interests that apply to plan making, and that should be given effect through each local government planning scheme. This includes the strategic airports and aviation facilities state interest.</p> <p>The SPP state interests are articulated through:</p> <ul style="list-style-type: none"> • a state interest statement: <i>The operation of strategic airports and aviation facilities is protected, and the growth and development of Queensland's aviation industry is supported.</i> • state interest policies (see extract below (SPP, p.60)) • assessment benchmarks that apply to certain development (see SPP p.61). <div data-bbox="384 846 1374 1393" style="background-color: #e0f2f1; padding: 10px;"> <table border="0"> <tr> <td style="vertical-align: top;"> <p>All of the following state interest policies must be appropriately integrated in planning and development outcomes, where relevant.</p> <p>(1) Strategic airports and aviation facilities are identified, including the associated Australian Noise Exposure Forecast (ANEF) contours, obstacle limitation surfaces or height restriction zones, public safety areas, lighting area buffers, light restriction zones, wildlife hazard buffer zones, and building restricted areas.</p> <p>(2) The safety, efficiency and operational integrity of strategic airports are protected.</p> </td> <td style="vertical-align: top;"> <p>Development and associated activities:</p> <p>(a) do not create incompatible intrusions, or compromise aircraft safety, in operational airspace</p> <p>(b) avoid increasing risk to public safety in a public safety area</p> <p>(c) are compatible with forecast levels of aircraft noise within the 20 ANEF contour or greater [as defined by Australian Standard 2021–2015: Acoustics—Aircraft noise intrusion—Building siting and construction (AS 2021), adopted 12 February 2015] and mitigate adverse impacts of aircraft noise.</p> </td> <td style="vertical-align: top;"> <p>(3) Development complements the role of a strategic airport as an economic, freight and logistics hub, and enhances the economic opportunities that are available in proximity to a strategic airport.</p> <p>(4) Aviation facilities are protected by avoiding development and associated activities within building restricted areas that may affect the functioning of the aviation facilities.</p> <p>(5) Key transport corridors (passenger and freight) linking strategic airports to the broader transport network are identified and protected.</p> </td> </tr> </table> </div> <p>Local governments integrate the strategic airports and aviation facilities state interest into planning schemes, where relevant. Local government implementation is supported by the:</p> <ul style="list-style-type: none"> • <i>State Planning Policy – state interest guidance material: Strategic airports and aviation facilities</i> • SPP Integrated Mapping System. <p>The NASF <i>Guideline D: Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation</i> is implemented through the <i>State Development Assessment Provisions (SDAP) - State code 23: Wind farm development</i> (SDAP code). The SDAP code applies to a material change of use for a new or expanding wind farm. It is intended to protect individuals, communities and the environment from adverse impacts as a result of the construction, operation and decommissioning of wind farm development.</p> <p>Queensland already protects public safety areas at the end of airport runways via the SPP. However, the state may undertake a review of the existing policy in light of <i>Guideline I: Managing the Risk in Public Safety Areas at the Ends of Runways</i> in the future.</p> <p>The following NASF Guidelines have not yet been integrated into the Queensland planning system, but are on Queensland's future policy development agenda:</p>	<p>All of the following state interest policies must be appropriately integrated in planning and development outcomes, where relevant.</p> <p>(1) Strategic airports and aviation facilities are identified, including the associated Australian Noise Exposure Forecast (ANEF) contours, obstacle limitation surfaces or height restriction zones, public safety areas, lighting area buffers, light restriction zones, wildlife hazard buffer zones, and building restricted areas.</p> <p>(2) The safety, efficiency and operational integrity of strategic airports are protected.</p>	<p>Development and associated activities:</p> <p>(a) do not create incompatible intrusions, or compromise aircraft safety, in operational airspace</p> <p>(b) avoid increasing risk to public safety in a public safety area</p> <p>(c) are compatible with forecast levels of aircraft noise within the 20 ANEF contour or greater [as defined by Australian Standard 2021–2015: Acoustics—Aircraft noise intrusion—Building siting and construction (AS 2021), adopted 12 February 2015] and mitigate adverse impacts of aircraft noise.</p>	<p>(3) Development complements the role of a strategic airport as an economic, freight and logistics hub, and enhances the economic opportunities that are available in proximity to a strategic airport.</p> <p>(4) Aviation facilities are protected by avoiding development and associated activities within building restricted areas that may affect the functioning of the aviation facilities.</p> <p>(5) Key transport corridors (passenger and freight) linking strategic airports to the broader transport network are identified and protected.</p>
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	<ul style="list-style-type: none"> • <i>Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports</i> • <i>Guideline H: Protecting Strategically Important Helicopter Landing Sites.</i>
...whether the NASF is reflected in policy, guidance and any other planning advice	<p>The NASF is reflected in the:</p> <ul style="list-style-type: none"> • SPP, the SPP Integrated Mapping System and <i>SPP Guidance: Strategic airports and aviation facilities state interest</i> (a guideline to support implementation of the state interest) • Local government planning schemes, where relevant. • SDAP State code 23: Wind farm development and <i>State code 23: Wind farm development – Planning guideline</i>
...what impediments (if any) have there been to full implementation	<p><i>Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports</i></p> <ul style="list-style-type: none"> • The state has integrated state, regional and local planning and development assessment requirements and processes. However, the federal assessment / approvals process for controlled activities (such as crane operations) in prescribed airspace under the <i>Airports Act 1996</i> and the <i>Airports (Protection of Airspace) Regulations 1996</i> sits outside of these processes. In addition, crane operation limitations associated with building in proximity to prescribed airspace are often overlooked by proponents and building designers and only become apparent in the construction phase. This can result in buildings designed to heights up to the obstacle limitation surface, where delivery of the upper floors can only be achieved through crane operations that intrude into prescribed airspace. Improved integration of federal processes with local and state development assessment processes and improved communication of the crane operation limitations near prescribed airspace would assist in the implementation of Guideline F requirements. <p><i>Guideline G: Protecting Aviation Facilities – Communications, Navigation and Surveillance (CNS)</i></p> <ul style="list-style-type: none"> • Delivery of the Development Impact Assessment Portal (DIAP) by Airservices Australia would provide transparency and simplify and assist in the protection of CNS (aviation facilities). <p><i>Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airport</i></p> <ul style="list-style-type: none"> • Determining a simple, suitable approach/tool to reduce the regulatory burden on development proponents within a windshear assessment trigger area (for example, acceptable outcomes or an interactive model of the assessment methodology).
- 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;	<p>There is a high level of awareness of the NASF by the relevant Queensland Government agencies (Department of Transport and Main Roads (DTMR) and the Department of State Development, Manufacturing, Infrastructure and Planning (DSDMIP)).</p> <p>Given the NASF is implemented in Queensland via the SPP and local government planning schemes, there is a high level of awareness of the SPP requirements amongst local governments, strategic airport operators and the development industry.</p> <p>Consultation</p> <p>On matters relating to the NASF, such as this NASF implementation review, DTMR informs:</p> <ul style="list-style-type: none"> • relevant state agencies
- the level of industry and community stakeholder awareness and familiarity with the NASF framework and guidelines.	<ul style="list-style-type: none"> • Local Government Association of Queensland for dissemination to local governments • strategic airport operators • relevant industry groups such as the Planning Institute Australia (QLD Division), Housing Industry Association, Queensland Master Builders Association, Property Council of Australia – QLD Division, Urban Development Institute of Australia and the Real Estate Institute of Queensland.

Guideline H: Protecting Strategically Important Helicopter Landing Sites

Queensland has established a key stakeholder reference group in relation to this guideline with representatives from Airservices Australia, Civil Aviation Safety Authority, Department of Defence, Cwth Department of Infrastructure, DSDMIP, DTMR, Queensland Fire and Emergency Services, Queensland Government Air, Queensland Health, Queensland Police, LGAQ, representatives from local governments, industry and airport operators.