

KERR Donna

From: Safeguarding
Subject: Defence - NASF Implementation Review

From: Hogan, Timothy MR
Sent: Friday, 17 January 2020 1:37 PM
To:
Cc:
Subject: FW: NASF Implementation Review [SEC=UNCLASSIFIED]

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Hi Donna,

Defence would like to provide the following comments / observations on how the NASAG Framework has been developed and implemented.

The Directorate of Land Planning and Regulation represents Defence on the NASAG. NASAG has developed a number of draft technical guidelines on planning requirements for development that affects aviation operations, this includes building activity around airports that might penetrate operational airspace and/or affect navigational procedures for aircraft. The guidelines seek to establish a national land use planning framework for development in the vicinity of airports, military airfields and under flight paths, they relate to hazards such as birdstrikes, wind turbines, lighting and penetration of operational airspace. Defence is supportive of the Principles and Guidelines that have been developed as part of NASAG and will continue to be actively involved in the ongoing work of the group.

A key priority for Defence is to work closely with relevant State, Territory and local governments planning agencies and industry and actively seek amendments to relevant planning legislation, instruments and policies around Defence sites in order to mitigate the impacts of encroachment on Defence's activities. The establishment of NASAG has provided an additional avenue for Defence to engage with relevant State and Territory agencies at a strategic level on encroachment issues around our airfields. NASAG provides guidance to State/Territory and local government decision makers, airport operators and developers about recognition of aviation impacts in land use planning decisions. It includes overarching principles and nine guidelines. Defence applies the relevant NASAG guidelines to military airfields, and certainly refers to NASAG guidelines when assessing and providing comments to State, Territory and Local Government planning authorities on a range of complex land planning strategies, development applications and strategic plans.

Defence recently provided comments to the South Australian (SA) government regarding the draft *Planning and Design Code (the Code) Phase Two Rural Areas* which was on public exhibition late 2019 and will also provide comments on *Phase Three (Urban Areas)* which is currently on exhibition. The SA Government is seeking to establish a single set of planning rules that will determine what landowners can do on their land. In responding to the draft Code, Defence noted that NASAG has developed guidelines in relation to aviation safety and recommended that these additional guidelines be included in the new Code and any revised version of the 'Building Near Airfields' module that is currently applied in the local government Development Plans around RAAF Base Edinburgh. Defence is concerned however, that not all of the NASAG guidelines will be adopted in the new Planning and Design Code. The SA government has released an *Update Report on Phase Three of the Design Code* consultation phase, the report includes a section on the NASAG Guidelines which indicates that NASAG deals with a range of airport safeguarding matters and that 'Aircraft Noise' and 'Building Heights' have been identified for particular attention. Defence would like to see that all the NASAG guidelines be included in the new Code.

Defence's experience is that relevant State, Territory and local government agencies have adopted some of the Guidelines but not all, and there does not appear to be a list available on which Guidelines have been

adopted and by what jurisdiction. In instances whereby the recommended Defence approach is more arduous than that of Civilian operations, such as the introduction of Guideline I on Public Safety, some jurisdiction have chosen to apply the civilian model and not the larger model recommended by Defence. Defence considers that civil approaches to public safety zones are not suitable for use at military airbases (particularly those where there are significant movements of fast jets) as they are based on civil aircraft and operations. Defence recognises that it is up to state and local government planning authorities as to which aspects of the guideline they choose to implement. Defence will continue to use the public safety guideline to raise awareness with state and local government planning authorities of the need for military public safety zones for our major airbases and advise on compatible land uses as a reference tool for considering public safety risk.

Townsville and Darwin Airports are joint user airports, with Defence playing a key role in their effective operation. Defence applies the relevant NASAG guidelines to military airfields and would expect that airport operators particularly at joint user airports would also apply the relevant guidelines and have them reflected in their respective Master Plans. Defence's experience is that some airport operators do not apply all relevant Guidelines, specifically the Defence requirements under Guideline I on Public Safety.

Happy to discuss.

Regards

Tim

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