

26 June 2023

Tasmanian Planning Commission
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Hobart TAS 7001
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Dear Sir / Madam

Re: Draft Tasmanian Planning Policies

Thank you for the opportunity to make this submission regarding the draft Tasmanian Planning Policies (TPPs). This letter sets out Launceston Airport's comments on the draft policies, particularly as they relate to airport safeguarding and the National Airports Safeguarding Framework (NASF).

The Draft TPPs includes the following strategies in section 5.5.3 under Ports and Strategic Transport Networks:

5. *Protect major airports by applying appropriate buffers that prevent the encroachment of incompatible use and development.*
6. *Support major airports by designating adjacent land to accommodate complementary use and development.*

They are the only statements in the Draft TPPs specifically relating to airports. Launceston Airport believes there is an opportunity to refer to NASF in section 5.5.3 to strengthen these strategies and provide clarity on what 'appropriate buffers' means.

In discussions with Launceston Airport during the development of the airport's current Master Plan, the State acknowledged its role in the implementation of the NASF guidelines through the planning system. In doing so the State identified that the planning system is broader than the relevant planning scheme, and some of the NASF Guidelines may best be implemented through appropriate strategic planning to avoid land use conflicts as opposed to implementing specific use and development controls in the planning scheme.

The State also stated that there may be opportunities to address many of the NASF guidelines through the TPPs which will provide the overarching policy guidance for use and development in Tasmania. The TPPs will guide the allocation of planning zones helping to ensure that airports are protected through any future rezoning proposals. It is therefore considered appropriate for the TPPs to refer to NASF.

NASF generally aims to:

- improve community amenity by minimising aircraft noise-sensitive developments near airports

- improve safety by ensuring aviation safety requirements are recognised in land use planning and development decisions.

NASF was developed by the National Airports Safeguarding Advisory Group (NASAG) comprising of Commonwealth, State and Territory Government planning and transport officials, the Australian Government Department of Defence, the Civil Aviation Safety Authority (CASA), Airservices Australia and the Australian Local Government Association (ALGA).

The NASF was agreed to by Commonwealth, State and Territory transport ministers at the meeting of the then Standing Council on Transport and Infrastructure in May 2012. Each jurisdiction is responsible for implementing NASF into their respective planning systems.

NASF includes seven principles and nine guidelines. The NASF principles are:

- *Principle 1: The safety, efficiency and operational integrity of airports should be protected by all governments, recognising their economic, defence and social significance.*
- *Principle 2: Airports, governments and local communities should share responsibility to ensure that airport planning is integrated with local and regional planning.*
- *Principle 3: Governments at all levels should align land use planning and building requirements in the vicinity of airports.*
- *Principle 4: Land use planning processes should balance and protect both airport/aviation operations and community safety and amenity expectations.*
- *Principle 5: Governments will protect operational airspace around airports in the interests of both aviation and community safety.*
- *Principle 6: Strategic and statutory planning frameworks should address aircraft noise by applying a comprehensive suite of noise measures.*
- *Principle 7: Airports should work with governments to provide comprehensive and understandable information to local communities on their operations concerning noise impacts and airspace requirements.*

The NASF guidelines are:

- *Guideline A: Measures for Managing Impacts of Aircraft Noise*
- *Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports*
- *Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports*
- *Guideline D: Managing the Risk of Wind Turbine Farms as Physical Obstacles to Air Navigation*
- *Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports*
- *Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports.*
- *Guideline G: Protecting Aviation Facilities - Communications, Navigation and Surveillance*
- *Guideline H: Protecting Strategically Important Helicopter Landing Sites*
- *Guideline I: Managing the Risk in Public Safety Zones at the Ends of Runways.*

In October 2021 NASAG released the 'National Airports Safeguarding Framework 2019 Implementation Review' report. This report included eight implementation recommendations:

1. *Commonwealth/State/Territory Ministers endorse an intergovernmental agreement to standardise a national approach to airport safeguarding.*

2. *National Airports Safeguarding Advisory Group (NASAG) continue to oversee implementation of the National Airports Safeguarding Framework (NASF).*
3. *NASAG to implement a schedule for ongoing review of all NASF Guidelines to ensure the currency and functionality of the framework.*
4. *Australian Government to include provisions relating to consideration of the NASF in legislation at the 22 federally leased airports by 2027.*
5. *State/Territory governments to include provisions relating to consideration of the NASF in their respective planning regimes by 2027.*
6. *State/Territory governments to develop and disseminate clear policy/guidance on the status of the NASF (for that individual jurisdiction), and how it should be applied to large and small airports.*
7. *Airports to initiate a process for regular consultation/engagement with local government on NASF issues.*
8. *Australian/State/Territory governments, peak aviation industry bodies, peak planning bodies to contribute to the development of NASF educational materials for use by planning practitioners, local government, tertiary institutions, and the building/development industry.*

Recommendations 5 and 6 above are particularly relevant to the TPPs.

The TPPs provides a timely and welcome opportunity to address the outcomes of the NASF Implementation Review in the Tasmanian planning system.

Launceston Airport would welcome stronger inclusion and reference to NASF in the TPPs to provide clearer protection for airports, consistent with the approach adopted in other states such as Queensland and Victoria. The social and economic importance of airports and the need to safeguard their ongoing operation in accordance with NASF, should be a key matter addressed in the TPPs.

Should you have any queries or wish to discuss these matters, please do not hesitate to contact me on 03 6391 6207.

Yours sincerely



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