Australian Government
Civil Aviation Safety Authority

AIR NAVIGATION, AIRSPACE AND AERODROMES BRANCH

CASA Ref: F23/1376-34

Your Ref: SSD-84467726 Request for advice auto email Wed 10/06/2026 10:41 AM

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Submitted through NSW Major Projects portal.

KOGARAH GOLF CLUB DEVELOPMENT - CASA COMMENTS

CASA received a request for advice from DPHI in relation to the to the Kogarah Golf Club Redevelopment - Concept & Stage 1 Works. Relevant documents include an Aeronautical Impact Assessment (AIA) by Strategic Airspace of 13 May 2026 and a Wind Shear and Turbulence Assessment by CPP of 18 May 2026. The AIA considers the NASF Guidelines, which is appropriate for a large building development near an aerodrome. For simplicity and synchronicity, comment on each relevant NASF Guideline follows:

Guideline A: Measures for Managing Impacts of Aircraft Noise

AIA Section 4.1. CASA has no regulatory responsibilities regarding aircraft noise and does not comment on noise issues. Aircraft noise is not strictly 'Aviation Safety' as such and is a matter for the Planning Authority.

Guideline B: Managing the Risk of Building Generated Windshear and Turbulence at Airports

AIA Section 4.2. It is noted that wind tunnel testing was carried out by expert consultant CPP. The primary criterion is cross wind shear. The 3 second gust wind speed needed to exceed the NASF 6 knots cross wind shear limit is above 60 knots. As CPP advises; 'well in excess of operational wind speeds'. Therefore, windshear for aircraft approaching runway 16R is under control.

The tests concluded that the 3 second gust wind speed needed to exceed the NASF 4 knots root mean squared turbulence limit is above 24 knots - the same as for existing conditions. CASA is not concerned because the NASF turbulence is effectively simplified turbulence – a measure of how much the wind speeds up and slows down … the criterion is problematic to measure and quantify and doesn't allow for rapid changes in height and direction and any swirling effects.

It is noted that runway 07/25 was not modelled or analysed on the assumption that aircraft would be landing on runway 34L or 34R in northerly winds. Also, the modelling was based on aircraft landing on runway 16R in westerly winds. As the developer of operational procedures for the various wind directions/speeds, and the holders of the runway usage

statistics, Sydney Airport should review the CPP Wind Shear and Turbulence Assessment and confirm the assumptions made.

A wind from approximately 290° would pass through the (lower rise) south end of the development site to the runway. Landing aircraft (on runway 07/25) would approach from the east in a 290° wind and therefore not be a problem. Departing aircraft are less affected by wind effects than approaching aircraft and departing aircraft will normally be well above the affected area. However, the reasons why runway 07/25 was not modelled could be explained in more detail (in the AIA or CPP Assessment).

Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports
AIA Section 4.3. CASA agrees with the Aeronautical Impact Assessment.
Also, CASA Advisory Circular (AC) 139-26(0) - Wildlife Hazard Management at Aerodromes provides general advice.

Sydney Airport is the primary stakeholder and has a Wildlife Hazard Management Plan, has people trained in wildlife management, and has better situational awareness and local knowledge than this office. It is acknowledged that there are multiple bird attractors in the area. However, the site is adjacent to departure and approach zones …. items such as open rubbish skips (especially containing putrescible waste) and obvious perching opportunities that can be avoided, should be avoided.

Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports

AIA Section 4.5. CASA agrees with the Aeronautical Impact Assessment. Also, in general terms, lights that could be confused with runway side lighting, end/threshold lighting, taxiway/apron lighting should be avoided. CASA is prepared to assess lights, solar panels, shiny roofs, and lighting plans if requested.

Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports

AIA Section 4.6.(and Section 1, Section 3.2 and Table 1.2) CASA agrees with the AIA. The Australian Government Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts (DITRDCSA) and Sydney Airport will be major stakeholders.
The following extract from AIA 4.6.2 is noted: "*Detailed modelling and verification are currently in progress and will be incorporated into an update of or supplement to this Aeronautical Impact Assessment (AIA) report to confirm full compliance with aviation safety requirements*".

CASA is prepared to review '*an update of or supplement to this Aeronautical Impact Assessment (AIA)'* and to assess the buildings and cranes under the Civil Aviation Safety Regulations and the Airspace Regulations when all the information is available.

Pertinent extracts from the AIA:

"*Under the revised framework Airports (Protection of Airspace) Regulations 2026, any development proposal that would intrude into primary airspace is classified as a "sensitive controlled activity", and proponents must first obtain permission before even lodging a formal application for approval*."

"*it is demonstrated that construction equipment (eg, cranes) and activities will not adversely affect the safety, regularity and efficiency of PANS-OPS instrument flight procedures*."

Incidentally, plume rise (not in NASF Guidelines) should not be an issue (major plume sources such as heavy duty power stations are not planned).

Guideline G: Protecting Aviation Facilities — Communications, Navigation and Surveillance

AIA Section 4.7. Airservices Australia reviews any proposed facilities or equipment that could affect aviation related communications/navigation/surveillance.

Guideline H: Protecting Strategically Important Helicopter Landing Sites

AIA Section 4.8. CASA agrees with the Aeronautical Impact Assessment that "*There are no known Strategic Helicopter Landing Sites (SHLS) in the vicinity of the site".* The nearest is probably St George Hospital – about 3.5km away. No issue.

Guideline I - Managing the Risk in Public Safety Areas at the Ends of Runways

AIA Section 4.9. CASA agrees with the analysis by Strategic Airspace. No issue.

Summary

The Aviation Safeguarding Assessment is credible, although more justification could have been provided for not assessing the wind effects on runway 07/25. Observance / compliance with the advice and recommendations in the AIA will ensure that risks to Aviation Safety are minimised.

If the proposal progresses to Airports (Protection of Airspace) Regulations 2026 stage, CASA will make recommendations for mitigations for the building and cranes when assessing the building and cranes under the Airports (Protection of Airspace) Regulations 2026; on receipt of a request for assessment from Sydney Airport.

Yours sincerely

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6 July 2026