

Joint submission on the proposed permanent Restricted Area (formerly TRA Nimbus)

Thank you for the opportunity to comment on the proposal to establish a permanent restricted area west of the existing Amberley military restricted areas.

We respond to this consultation on behalf of Queensland Sports Aviators (QSA) and the New South Wales Hang Gliding and Paragliding Association (NSWHPA), the regional associations representing Sports Aviation Federation of Australia (SAFA) members in South Queensland and New South Wales respectively. Our members include hang glider, paraglider, powered hang glider, powered paraglider and weight-shift microlight pilots. Many of our pilots regularly undertake cross-country flights through the airspace mentioned in this proposal. QSA and NSWHPA support initiatives that improve aviation safety while seeking to ensure that restrictions on airspace are proportionate, well justified, and minimise unnecessary impacts on all airspace users.

QSA and NSWHPA recognise the importance of providing the Australian Defence Force with appropriate airspace for essential military training. However, we believe the proposal would benefit from further justification and consideration of its impact on recreational aviation, particularly cross-country flying in South Queensland and northern New South Wales.

Our concern is not with Defence training in principle, but with whether the proposed permanent designation is necessary, proportionate, and supported by sufficient safeguards for affected airspace users.

Need for an additional restricted area

The proposal states that the permanent restricted area is required to "extend Amberley restricted areas when required to support Defence flying training outcomes." However, it does not explain why the existing Amberley restricted areas are insufficient to support these activities.

The Amberley restricted area complex already comprises one of the largest and most extensive military restricted airspace systems in Australia. Given the considerable volume of restricted airspace already available to Defence in this region, we believe the consultation material should provide a clearer operational justification for establishing an additional permanent restricted area.

In particular, it would be helpful to explain:

- why the existing Amberley restricted areas cannot accommodate the intended training activities;

- whether alternative training profiles or configurations within the existing Amberley restricted areas were considered;
- whether the existing restricted areas have been reviewed in terms of their use, or a potential reduction of their area size or activation levels, to limit the cumulative impact of the extensive restricted airspaces in the region on other airspace users;
- how frequently TRA Nimbus has historically been activated;
- the typical duration of those activations; and
- whether the proposed permanent designation is expected to alter the frequency or duration of activations.

Providing historical utilisation data would allow stakeholders to better assess whether establishing permanent restricted airspace represents the least restrictive means of achieving the required military training outcomes.

Safety concerns

The proposed restricted area overlaps airspace regularly used by sport and recreational pilots, including hang glider, paraglider and glider pilots undertaking cross-country flights.

Cross-country flying involves pilots using thermals and weather conditions to travel significant distances from their launch site, often without a pre-determined route. For hang glider and paraglider pilots, route choice is highly dependent on lift, wind, cloudbase, landing options and safe retrieve access, meaning that diversion around restricted airspace can be significantly more difficult than for powered aircraft.

Unlike many powered aircraft operators, most recreational hang glider and paraglider pilots do not have ready access to updated NOTAMs or aeronautical information during flight and are therefore unable to determine whether a conditional restricted area has become active after commencing their flight. While club officials and pilots commonly check NOTAMs before flying and communicate known activations to other pilots, only a very small proportion of recreational pilots have access to updated aeronautical information in flight.

This creates a potential safety issue. A pilot who is unaware that the restricted area has become active may inadvertently enter airspace being used for high-speed military operations, increasing the risk of conflict between military and recreational aircraft.

The practical alternative for recreational pilots is to permanently avoid the proposed restricted area, regardless of whether it is active. However, this would effectively

remove access to some of Queensland's most important cross-country flying areas, including cross-border routes used by pilots launching from northern New South Wales, and substantially reduce opportunities for recreational soaring in South-East Queensland.

For many pilots, the choice therefore becomes one of either permanently avoiding valuable flying areas or accepting an increased risk of inadvertently entering activated restricted airspace. QSA and NSWHPA believe that airspace design should seek to avoid placing recreational pilots in this position wherever reasonably practicable.

Proposal to de-conflict operations

If Defence determines that the additional restricted area is operationally necessary, QSA and NSWHPA encourage consideration of raising the lower limit from **10,000 ft** to **14,000 ft**, where operationally feasible.

This would substantially reduce conflicts with recreational aircraft. Under current regulations, hang glider and paraglider pilots generally cannot operate above approximately **12,500 ft** without supplemental oxygen, and only a very small proportion of recreational flights would use oxygen or reach those altitudes in practice. A lower limit of 14,000 ft would therefore preserve Defence's access to higher-altitude training airspace while largely deconflicting military operations from recreational cross-country flying activities.

If operational requirements prevent a uniform lower limit of 14,000 ft, Defence could also consider applying different lower limits to different parts of the restricted area, depending on the nature of the training being conducted.

Minimising impacts and requested safeguards

The proposal states that the airspace will only be activated when required and that activation periods will be kept to the minimum necessary. QSA and NSWHPA welcome this commitment and encourage Defence to continue seeking opportunities to minimise both the geographic extent and duration of activations wherever operationally possible.

If the proposed restricted area is established, QSA and NSWHPA request that Defence:

- provide historical utilisation data for TRA Nimbus, including frequency and duration of previous activations;
- confirm whether permanent designation is expected to alter the frequency, duration or ease of activation;

- consider raising the lower limit to 14,000 ft, or applying stepped lower limits where operationally feasible;
- publish planned activation windows as early as practicable, rather than relying solely on short-notice NOTAMs;
- consult with SAFA, QSA, NSWHPA and affected clubs before major planned activation periods, particularly during known competition or peak cross-country flying periods; and
- conduct a review after 12 months, with activation data made available to affected airspace users.

Thank you for considering these recommendations.

Signed,

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