

Queanbeyan Branch (NSW)
Australian Labor Party
PO Box 933
Queanbeyan NSW 2620

29 July 2009

Mr Nicholas Dowie
Planning Policy and Environment Section
Airports Branch
Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

SAFEGUARDS FOR AIRPORTS AND THE COMMUNITIES AROUND THEM

Submission from the Queanbeyan Branch (NSW) of the Australian Labor Party

At its meeting on 14th July 2009, the Queanbeyan Branch (NSW) of the Australian Labor Party, considered the above report and after careful consideration of the Discussion Paper adopted the following resolution:

- Consideration of the ANEF system in the context of a review of safety issues affecting airports is inappropriate;
- The time frame for responses to the discussion paper is insufficient to allow proper consideration of the complex issues relating to the ANEF systems;
- If government considers a review of the ANEF system is timely, necessary and appropriate, then such a review should be undertaken in an open and transparent manner by an appropriately qualified independent person;
- The review appears to be motivated by a desire to serve the narrow interests of one particular airport;
- In view of the above the Queanbeyan Branch supports the continued use of Australian Standard 20-21 and the ANEF system as the basis of land use planning decisions near airports until such time as a review by an appropriately qualified independent person or body – following a comprehensive and transparent process – recommends otherwise.
- Until such time as the Government completes an independent review of the ANEF system, the method of endorsement of ANEF contours be modified to prevent manipulation of the system to suit the commercial interests of an individual airport, as has been the case with Canberra Airport.

1. Consideration in context of safety issues is inappropriate.

The title of the discussion paper establishes an expectation of a presentation of a range of safety issues, and indeed that is the case. Readers are invited to consider “Public Safety Zones”, “Safety Management Systems”, the potential dangers of “turbulence”, “wildlife”, “wind turbines” and “lasers”. However in a totally incongruous juxtaposition, the paper seeks to elicit debate on the ANEF system.

Such a proposal is absurd and totally inappropriate. Each of the other elements is a legitimate safety issue worthy of consideration for identifying “safeguards”. But the ANEF system relates to land use planning and has no relationship with safety.

2. The timeframe for responses is inadequate.

The discussion paper was released at the beginning of July with submissions due by 31st July. This is a laughingly brief timeframe for serious consideration of matter so complex as the ANEF system which has been endorsed as the basis of land use planning decisions by the Commonwealth and every State and Territory Government for decades.

3. If a review of the ANEF system is necessary it should be conducted by an independent person or body in an open and transparent manner.

It is totally inappropriate that DITRDALG should be conducting this review. Over several years the Department has attempted to initiate a review of this system but their efforts have failed because most stakeholders believe the current system works effectively.

However if Government believes it is timely to review the system then the review must be undertaken within the context of an appropriate “Terms of Reference”, and be conducted by a person or body independent of the Department, and in an open and transparent manner.

4. Review suits the political and commercial agenda of Canberra Airport.

Only one airport has consistently opposed the continuation of the ANEF system. This is Canberra Airport which has for commercial reasons opposed a Queanbeyan residential land development which complies with AS 20-21 and the ANEF system. In pursuit of its political agenda Canberra Airport has acknowledged an expenditure of \$160,000 in a campaign to defeat an endorsed candidate who supported the residential development opposed by the airport.

5. Australian Standard 20-21 and the ANEF system should be retained until a review by an appropriately qualified independent person or body – following a comprehensive and transport process - recommends otherwise.

Considering the ANEF system has been in place and worked effectively over several decades, it would be futile and problematic to change to another system without first reviewing the ANEF system in its entirety. A review of the Australian Standard AS 20–21 and the ANEF, if a full

review is deemed necessary, should only be conducted by an appropriately qualified independent body or person. Any changes to the ANEF system should only occur after a rigorous, comprehensive and transparent process recommends that change is warranted.

- 6. Until such time as the Government reviews the ANEF system, the method of endorsement of ANEF contours be modified to prevent manipulation of the system in the manner demonstrated by Canberra Airport.**

Under the current arrangements endorsed by Air Services Australia and the Department, the ANEF contours are determined by the airports themselves, and to all intents and purposes are rubber stamped by the bureaucracy. Because there is no requirement to verify the validity of the underlying assumptions in relation to the number and timing of aircraft movements, the system is open to manipulation. The current ANEF for Canberra Airport is based on plane movements of one every two minutes 24 hours a day, 365 days of the year. The ANEF is justified by the Canberra Airport proposal to land 334 planes every night between 11.00pm and 6.00am. These will include 6, 747s; 35, 757s; 56, 737-800s; etc etc. Any rational person observing this proposition would declare the Airport claims as absurd, yet the Department and Air Services have never once challenged the credibility of the Airport claims. It is for this reasons that the determination of ANEF's should be placed in the hands of a body which can be trusted to make its determination based on accuracy and transparency.

In conclusion it is pointed out that Canberra Airport has maintained an unrelenting campaign to instill fear and uncertainty about the impact of aircraft noise upon the communities of the Canberra region. Rather than undertaking a program to promote a better understanding of the noise impacts of the legitimate future development of the airport, Canberra Airport has initiated a fear campaign that NSW Government approval of a particular residential development in Queanbeyan will result in catastrophic impact across the region. Many residents believe this a smoke screen to distract attention from the Airport plans of a 24 hour freight hub which will land over 300 freight planes between 11.00pm and 6.00am every night of the year.

Brian Brown
Secretary
Queanbeyan Branch (NSW) Australian Labor Party