

STRATEGIC AND REGULATORY SERVICES



Enquiries: Mr Gavin Ponton
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Our Ref: EG/14/2

31 July 2009

Mr Nicholas Dowie
Director, Planning Policy and Environments, Airport Branch
Department of Infrastructure, Transport, Regional Development and Local
Government
GPO Box 594
CANBERRA ACT 2601

Dear Mr Dowie

**SUBMISSION ON DISCUSSION PAPER - SAFEGUARDS FOR AIRPORTS
AND THE COMMUNITIES AROUND THEM**

Please find attached the City of Canning's submission in relation to the above
Discussion Paper.

Please contact Gavin Ponton, Executive Strategic and Regulatory Services for further
information in relation to this matter.

Yours faithfully

A handwritten signature in black ink, appearing to read 'Mark Dacombe'.

For: Mark Dacombe
CHIEF EXECUTIVE OFFICER

Submission Attached

Ref: ps512july2009

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Above all - Service

SUBMISSION ON DISCUSSION PAPER - SAFEGUARDS FOR AIRPORTS AND THE COMMUNITIES AROUND THEM

Background:

The City of Canning is located in the Perth Metropolitan Area, Western Australia. The City is impacted upon by aircraft movements associated with Perth International Airport to the north east of the City and Jandakot General Aviation Airport to the west. The areas of the City of Canning in proximity to these airports are built up and include substantial areas of low to medium density established housing. In relation to aircraft noise impacts the City is represented on the Perth Airport Noise Management Consultative Committee and the Jandakot Airport Consultative Committee.

Comment:

The City has reviewed the content of the discussion paper "Safeguards For Airports and the Communities Around Them". Of particular relevance to the City of Canning is the section of the discussion paper entitled "Planning for Compatible Development". In response to the matters raised in the discussion paper the following points are raised:

Protection of Aviation Activities and the Need to Also Recognise Protection of Residents:

The Discussion Paper is written from the point of view of protecting aviation activities from possible "constraints" due to proximity of non compatible uses such as residential. In the City of Canning situation residential land uses in the vicinity of the airports are largely existing. Whilst the importance of controlling further development in noise affected areas (and to notify prospective residents of noise impacts) is acknowledged, there also needs to be recognition by airports and aviation regulators that the amenity of existing residents needs to be respected. Rather than just ensure residents are aware of increasing noise impacts, the aviation industry needs to acknowledge impact on communities and take steps to adjust airport operations and flight paths to prevent these increased impacts.

Review of ANEF and Australian Standard and Need for Improved Indicators of Noise Exposure:

Items 1 to 3 included in the Discussion Paper under the section "Planning for Compatible Development" are supported in the context of producing better outcomes with respect to future land use planning and protection of residents from noise impacts in the vicinity of airports. Further to the comments above, however, the Discussion Paper however takes the view that the ANEF's have a key role in protecting airport operations through informing residents and prospective residents of the likelihood of noise and identification of the need for noise attenuation measures for particular land uses. The ANEF system for land use planning is however recognised as being flawed in terms of assessing impacts, particularly with respect to general aviation airports such as Jandakot. Accordingly, in addition to recognising the need to overhaul the ANEF system and to produce more informative indicators to the general public on noise affected areas, it needs to be emphasised that airport operators and aviation regulators have a role in ensuring their operations are managed in a way that does not impose additional noise impacts on established communities. The stance of the Discussion Paper that ANEF's and other noise metrics may be used to justify additional noise impacts simply due to the fact that the community was

being made aware of existing and potential impacts (and required to impose noise insulation in certain circumstances) it not supported. Airport operational considerations such as flight path reviews, fly neighbourly practices, hours of operation and restrictions in aircraft types need to be employed, particularly in established residential areas, to ensure that the impact of airport operations are contained. In these circumstances, the ANEF or other noise forecasting metrics should take on the role of measuring the existing and future impact of an airport's activities and using this information to adjust operations to ensure that existing or target benchmarks are not exceeded.

Consultation on Flight Path Changes:

Changes to flight paths are regular cause of increased aircraft noise complaints within the City of Canning. Current consultation processes associated with review of flight paths and proposed changes are flawed. A regulated system of consultation is recommended with respect to the review or implementation of flight path changes where there is potential for noise impacts. Changes and any likely impacts need to be presented in a manner which the general community can understand. Reasons for the changes and consideration of alternative options also need to be provided to the community using non technical language and easy to understand plans.