

Safeguards for airports and the communities around them

Discussion Paper June 2009

Dept. of Infrastructure, Transport, Regional Development & Local Government

Response by City of Salisbury 30th July 2009

The City of Salisbury which is in South Australia and contains the Parafield Airport and Edinburgh Defence airport provides comments as follows:

Matters in the Discussion Paper:

1. Planning for Compatible Development

- ANEF system
 - Council supports the review of the ANEF system
 - Ultimate capacity rather than the Forecast measure would provide more logical long term land use arrangements around airports. Responding to changing Forecast measures is not practical in land use control.
 - There would be difficulty in changing from the ANEF system identifying land use control to other metrics such as the N70, even if it is determined to be a better system. Using both would seem to be problematic in explaining to the public the impacts of the use of a different metric. There might need to be a separation between use of the new metric for new airports or still largely greenfields airports and those airports that are longstanding and surrounded by urban development planned around the ANEF system.
 - Underlying assumption of ANEF system that 20 ANEF is an acceptable impact on population need reconsideration – 12% population affected by noise impact is not by any standard a minimal impact. Review of this figure in conjunction with the Ultimate capacity would be assumed to result in a more practical identification of airport noise impact. This of course would lead to much greater isolation of land use from urban development, and is also only most beneficial in a greenfields situation. It does nothing to assist communities around existing airports.
 - Complementary to the review of the ANEF system and extent of land isolation is the need to identify triggers for relocation of airport operations or airports once the nuisance value, need, or general impact is beyond a determined acceptable amount. There is an underlying assumption that all airports evenly contribute to aviation industry. Interrogation of the flight movements and economic benefit information undertaken to inform Airport Master Plans does not always confirm the statements within the Master Plan itself.
 - This previous point is also linked to the potential option to consider special arrangements for state and local government consultation with the Commonwealth on proposed developments around federal airports. This

again does not allow consideration of the reverse impacts. In the case of Parafield Airport 2009 draft Master Plan, the landing area for helicopters from the flight school was relocated from the 2004 location. The modeled ANEF impact extends over the residential area that was not previously affected. There is no regard given by the airport operators of this impact on the community. Yet, Council is expected to further isolate land from the airport noise without question. Council expects that if the outcome is that land use must recognize the changed airport operations, there must be a mechanism to require the airport operators to compensate Council for renewed policy work should the airport operations change by such means as the flight school relocating.

2. Protection of Operational airspace
 - Council supports the need to protect operational airspace
 - A simpler identification should be given than the OLS maps. Consistent links with State and Council Development Plans should occur to create and promote the awareness of the heights and obstacles around a defined area. This may be able to be more finegrained due to modern mapping technology than was previously the case.
3. Turbulence and wind shear
 - Council supports the need to establish protocols for assessment of turbulence and wind shear.
 - Consistent links with State and Council Development Plans and Building codes should occur. This could identify a height differential or mass extent depending on wind factors for the locality.
 - Questions on who is to identify, pay and confirm the impacts needs consideration
4. Wildlife hazards
 - Council supports the need to consider birdstrike potential
 - Council has begun discussions with the Parafield Airport operator on this issue
 - The extent of the affected area needs consideration of the difference between airports catering for large jet airlines and general aviation airports.
 - The likely activities can be incorporated into Development Plans through a standardized State approach.
 - Questions exist on who is the expert at airports to consider such matters, who enforces the matter, who explains to the public the limitations on certain landscaping styles, and how to identify reasonable breaches.
5. Wind turbines
 - Council supports the need to consider wind turbines assessment
 - Consistent links with State and Council Development Plans and building codes should occur. Guidelines should be created that can be used in the assessment of turbines by the authorities and used by the wind turbine industry in order to assist in identifying suitable locations.
6. Technical facilities

- Council supports the minimizing of impacts of new developments on radar and navigation systems.
 - Difficulty in SA is that this type of aspect is not controlled by the development legislation and is therefore not known about by the authorities, not able to be controlled, nor is there is expertise available in Council in these matters.
 - Referrals to Airservices or the airports will slow consideration of proposals by State and Council authorities, and would in likelihood overwhelm in number the airport process dealing with assessment of these matters.
 - Matters of ability to redirect application proposal designs, and enforce compliance would require consideration.
7. Lighting and pilot distractions
- Council supports the review of the adequacy of the laws surrounding the use of lasers, high intensity lighting and other pilot distractions.
 - The matter of what is a Council or State responsibility requires clarity
 - The matter of what is controllable by an authority requires clarity
 - Council is accepting standardized lighting controls around the Edinburgh Defence airport through Development Plan upgrades.
8. Public safety zones
- Council supports public safety zones as special consideration for new developments to maximize safety
 - Subject to extent of safety area and linkage to risk analysis
 - Understanding on whether there is a linkage to ANEF isolated areas
 - Resolution of compensation for land owners affected by zone
 - Council has worked with Defence on areas south of Edinburgh airfield to create within the Development Plan the public safety zones.
 - Recognition of regular review of the zone and risk factors through the master plan exercise and interrogation of the information

Matters not in the Discussion Paper:

1. Federal recognition of impacts and extent of potential policy responses to meet airport safety
 - The Review of the matters raised in this discussion paper highlights the one sided nature of protecting airport operations. Council fully supports the need to protect viable airports and airport operations and controlling the impact of aircraft noise on the community. Council is acutely aware of these matters, and as such, considers that the review must
 - incorporate investigations into airport viability and its real contribution to the airport industry sector on an airport by airport basis.
 - consider triggers in airport master plans for relocation of the airport or particular operations

- consider the total cost and impact on land use planning to meet the requirements arising out of the discussion paper and which must be reflected in the master plans economic impact analysis
- consider what support will be offered to Councils and the State to meet the potential requirements arising out of the discussion paper.
- Recognize the need to have a framework that identifies when airports are deemed to have an unacceptable impact on the community and the management of overcoming that situation.

Thank you for the opportunity to make comment on the discussion paper.

Regards

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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