

## **Safeguards for Airports and the Communities around them**

### **Introduction**

This submission is provided in response to the Discussion Paper released on 23 June 2009 – Safeguards for Airports and the Communities around them by the District Council of Ceduna, the owner and operator of the Ceduna Airport in South Australia.

As a smaller airport, the Ceduna Airport recognised the need for a uniform approach across the entire aviation sector as it relates to the protection of aviation safety and promoting the effective use of airports now and into the future from off airport development.

A risk based framework as suggested by the original green paper and further promoted in the current discussion paper would be supported by this airport. Frequently Government initiates a one size fits all approach to the aviation industry which makes compliance by the smaller airports prohibitively expensive and unnecessary.

### **Off Airport Land Use Planning**

#### **ANEF's and AS2021**

#### **Questions 1 – 5**

The Ceduna Airport supports the initiative to examine the value of the current ANEF system and other aircraft noise systems to ensure the best system is used going forward, which will best provide airports, local, State and Federal Governments and surrounding residents with appropriate information in regards to airport noise.

We support the Australian Airports Association's recommendation that there should not be an attempt to reconfigure the current ANEF system but to review all systems and ensure a workable system for the future is installed.

Any such review should ensure all stakeholders agree on the policies and principles of the system to be enforced. The review should establish clear objectives and end uses of such a system and the desired outcome in relation to land use planning. Issues of frequency and volume of noise are not currently adequately addressed in the ANEF system and any new system should be based on a more detailed planning and design process.

### **Operational Airspace**

#### **Questions 6 – 7**

Airspace protection should be applied to all CASA certified and registered airports. We support the strengthening and broadening of the airspace regulatory provisions to cover these airports.

The currently adhoc regulations as applied across different local government areas could be simplified to a clear and straight forward regulatory regime that prevents penetration of the OLS and PANS-OP surfaces around airports.

A nationally regulated regime with clear lines of communication for planning applications, assessments by airports and decision making by appropriate authorities eg. CASA would go a long way to providing an uncomplicated system for assessing proposed developments surrounding airports.

A mandatory referral system should be developed to ensure that all developments that may infringe on published Airport operational surfaces. Each States planning agency, their Department of Transport, the Airport Operator and CASA should be provided with an opportunity to assess these development proposals and the State planning agency should determine the approval or otherwise. This would ensure that developments that are proposed in a neighbouring Councils area but have potential to effect airport operations are assessed appropriately.

An appropriate appeals mechanism must also be in place to allow airports and airlines to appeal to the Commonwealth against approved penetrations of the OLS where the airport or airlines believe the approval will affect the current or future capacity of the airport.

### **Turbulence and Wind Shear Questions 8 – 9**

Assessment of the potential wind shear effects should be made as a matter of course and be included in a nationally regulated regime applied by local, State and Commonwealth departments when assessing developments off airport.

Assessment for wind shear should be made based on expert aviation input including airports, airlines and with the relevant regulatory authority eg. CASA for both on and off airport proposals.

The method(s) of assessment should also be prescribed and undertaken to a relevant standard by suitably qualified and experienced service providers. The costs of such assessment should be born by the proponent of the proposed development.

### **Wildlife Hazards Questions 10 – 11**

The Australian Airports Association Bird and Wildlife Hazard Management Working Group have adopted a recently developed Bird Risk Assessment model which covers this issue.

The model is available freely to all Australian Airports.

## **Wind Turbines**

### **Questions 12 – 13**

A nationally regulated approach to wind turbine developments as proposed in Questions 6 -7 & 8 – 9 above would address this issue. Wind turbines should be considered a development which could affect the operation of the aviation infrastructure and as such should be a notifiable development.

All proposed wind farms within a 30km radius of an airport need to be notified to both the airport operator and CASA for assessment and approval.

## **Technical Facilities**

### **Questions 14 – 15**

The 5km radius proposed in the discussion paper is supported, and mandatory assessment and approvals required from relevant authorities eg. CASA, Airservices Australia and the effected Airport's.

A consistent nationally regulated regime applied across local, State and Commonwealth Governments giving clear guidelines on mandatory assessment by these authorities is required.

## **Lighting and Pilot Distractions**

### **Question 16**

Again referral of any developments including laser lighting, high intensity lighting etc. should be referred automatically to the relevant authorities eg. CASA and Airservices Australia for their direction on potential impacts to aviation safety/pilot distractions.

Notification to airports who maybe affected should also be a requirement.

Ongoing regular reviews of existing standards and revision if required of these standards by CASA and Airservices is appropriate and necessary.

## **Public Safety Zones**

### **Questions 17 – 21**

Public Safety Zones in principle are a worthwhile concept. If designed and based on an agreed risk assessment model each airport could then be assessed on a case by case basis, giving a consistent approach to all airports.

The development of criteria, including shape, size development allowable etc. in these zones, must involve all experienced and relevant authorities' to ensure a workable system is introduced based on Australian requirements.

Again many of the smaller airports, although receiving regular passenger transport, would possibly pose minimal risk and therefore the risk must be assessed on an airport by airport specific basis.

Any consideration should be resolved at COAG as it will require a consistent approach and Australia wide implementation so as not to prejudice any particular state or region.

The introduction of PSZ's involving existing infrastructure or development, is however fraught with danger. Requests for compensation or claims for loss of use are almost certain to arise from affected parties. We support the Australian Airports Association position that the airport should in no way be held responsible for dealing with any claims which may arise as a consequence of the introduction of PSZ's by the Commonwealth.