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

Dear Mr Dowie

Safeguards for Airports – Discussion Paper

I am writing this submission as a resident of Canberra who lives within earshot of the Canberra (international) Airport and also as the brother of someone who lives just outside the ANEF 20 line in Kingsford, Sydney.

We studied and understood the ANEF lines prior to the purchase of his house.

I also work as a town planner here in Canberra and have a reasonable understanding of the ANEF system.

I agree that Airports are valuable transport, tourism, employment and business assets for the local and national economy. But I only agree to the extent that they serve the local community.

I also agree that a clear and coordinated regulatory environment for land use planning and development controls on and off airports would serve both aviation operators and the public.

My submission will focus on issues relating to the last 3 dot points on page 1 of your discussion paper.

- preserving the amenity of areas around airports

- providing for effective use of the airport
- clarity in planning for land use (particularly in terms of property values)

I note with interest that you provide Public Safety Zones PSZs as an example of a safeguard approach. You describe them as risk contours off the ends of runways based on use statistics correlated against international crash data. And you state that they provide an objective basis for precautionary planning decisions. You identify the potential for this to be contentious amongst land owners and residents who currently live or work in these areas.

Planning for Compatible Development

"Airports are essential elements of regional and national transport networks.." I would argue that they are not actually essential, rather they are an important part of the transport network that we choose to live with in order to maintain our lifestyle. The community is willing to bear some of the external costs of the transport system while the overall benefit is apparent. This would not extend to having transport for transport's sake.

Reaction to aircraft noise, like any nuisance noise, is a highly personal matter. Some people are very sensitive to it and others love the sound of an aeroplane. An important factor that appears to be lacking in your discussion is the need to provide people with a degree of choice. Some people, for example those who work at the Airport, may wish to live close to the airport and may not be sensitive to noise levels that are higher than some in the community would tolerate.

You identify that particular concerns with regard to aircraft noise include increased movements during the sensitive night time period and reduced respite periods on weekends.

You describe the ANEF system and identify its limitations. You fail to state that for about 25 years it has worked as a planning tool and has been generally accepted – this alone should indicate that it is fundamentally sound.

In relation to the limitations you identify:

- a one size fits all approach means that it is nationally adopted and well understood between jurisdictions. The alternative is a different approach for each airport that would be unmanageable. Contrary to your statement, the ANEF system does take into account large and small airports by taking into account the frequency (future maximum capacity) of flights. Whether an airport is built out or in a Greenfield area shouldn't impact upon future planning decisions infill or Greenfield development would be equally affected.

- It is not surprising that noise complaints from widely variable human beings do not match the theoretical model. This might be a result of several factors. Firstly, the ANEF system is not supposed to predict adverse reactions – because in areas close to airports informed buyers who are happy to hear aeroplanes will buy devalued houses and not complain about noise (but be happy to have an affordable home). Secondly, at ANEF 1 (a line not frequently plotted) there will be a small number of people who are very sensitive to noise who are unlikely to be informed about aircraft noise when they buy their house, or when the ANEF 1 line creeps over their house as a result of increased aircraft traffic. These people will complain.
- It is true that the public understand decibel levels better than they understand ANEF lines, but decibel levels are only a fraction of the information people need to know before making housing purchase or planning decisions. The time of day and frequency are also very important considerations. If these are included, we're getting back to describing the ANEF.
- The ANEF do not capture busy light aircraft circuits. Nor would the decibel maps that seem to be the favoured alternative.
- Aircraft noise does not stop at a contour line on a map. This is not a criticism of the ANEF system, it will be a valid criticism of any simplified model designed for public information. The ANEF system provides an objective mechanism for making planning decisions which require a line on a map. Any system that draws a line on the map will fail to stop aircraft noise at that line.

Many of the limitations you raise in relation to the ANEF would be equally valid for the PSZs that you are considering introducing. A crashing aircraft is unlikely to stop at a risk contour. The fact that you are considering introducing PSZs suggests that the limitations in the ANEF system are readily manageable.

The ANEF system does however have one significant limitation

- the contours are prepared by the airports themselves. The lack of a reality check on the number and type of plane modelled leaves the ANEF lines open to manipulation by the private airport operators. Air Services Australia or an independent body could perform this checking task.

Single event contours are next to useless. I don't care how many planes fly over my house during the day while I'm at work, but I'm quite sensitive at night.

In relation to your options for enhancement I suggest:

- The ANEF system is a tried and tested planning tool. It also works quite well to inform the public about potential noise exposure and hence allows informed house purchase decisions to be made.
- A review of any Australian Standard is welcome.

- Additional information is always welcome, however it should not be allowed to be used as propaganda or deliberate information overload to confuse matters. Airports that publish excessive information that exaggerates their noise footprint may find that their concern about noise complaints becomes a self-fulfilling prophecy. The ANEF system is a simple, national system that has worked for 25 years.
- The ANEF system has successfully incorporated support for future operations of airports into planning decisions by allowing for 'ultimate capacity operations' to be considered.
- The idea that stronger arrangements for protection of corridors under flight paths needs to be very carefully considered. There could be a number of consequences including: The sterilisation of land for development that would lead to calls for compensation (and impact on housing affordability – another concern of the government). The devaluation of existing development (including my brothers house), also leading for calls for compensation. You identify that the introduction of PSZs could be contentions among land owners, residents and occupiers but you fail to identify the same issues that would be applicable to any such noise related restrictions on land use introduced through modification of the currently adopted system.
- I find the discussion about restricting development near airports to be vastly different to the approach taken around other industries in this nation. There are several other industries that are very important in the maintenance of our lifestyle including other components of the transport system, mining and so on. In my experience, if a mine for example, wishes to expand its operations and possibly encroach on a residential area it is the responsibility of the mine operators to minimise the impact upon the receiving community. Where the mine wishes to prevent the community moving closer they purchase the land and pay appropriate compensation. Since privatisation of Airports, they are no different to the mine sites that I have worked on around the country. You say several times in your discussion paper that "aviation activity has a high economic value". If this is the case then the airports should be capable of buying the necessary land or paying due compensation. If airports are not capable of making these payments then clearly the community is subsidising the external costs of the airline industry and the cost of air travel may need to rise. Why does the commonwealth treat the airline industry so differently to all other industries? Even our local water and power authorities have to buy easements or pay compensation to lay service infrastructure over private land.
- The commonwealth could consider handing control of all airports over to local planning authorities so that the interests of the local and state communities could be more directly represented in planning matters. I understand that this is probably an unlikely outcome.

In summary, I think that the ANEF system is fundamentally sound although it could do with some additional checks and balances. Does anyone really believe that Canberra Airport will achieve traffic levels greater than current Sydney traffic, and that they will still be flying Dash 8's when it happens?

To answer the questions directly:

1. Yes. See discussion above.
2. Adequate. And no viable alternative is proposed so there is no option but to continue working with it.
3. Yes. As long as people have the opportunity to be informed buyers. Remembering that many people in Sydney have had the ANEF contours move to them rather than them choosing to live within them.
4. Assuming that the ANEF system is adequate, the focus of question 4 should be on the provision of reasonable growth estimates at airports.
5. Yes, this would be a reasonable suggestion, but only if the reciprocal arrangements were also agreed to – i.e. developments within major airports should have to be referred to state and local governments for approval (not just comment). There must be balance in all things.

I wish you the best of luck for your review and thank you for the opportunity to comment.

Regards

Kip Tanner.
Narrabundah ACT.