

Comments on “Safeguards for airports and the communities around them” Discussion Paper

Table 1 – Planning For Compatible Development:

As a general comment, some concern is expressed at the potential for changes or replacement of the existing state govt framework (State Planning Policy No. 5.1 in Western Australia, relating to Perth Airport). A current revised Perth Airport Master Plan proposes some changes to ANEF Contours, which will need to be incorporated into State Planning Policy No. 5.1. Long-term planning (such as zone and density code boundaries) is based on ANEF Contours so changing these can have significant ramifications. Town Planning Scheme provisions relating to ANEF Contours (eg. requiring noise attenuation or limiting certain types of uses) also take a long time to change under the current Western Australian planning system (perhaps a year or more). Therefore it would be preferred if such changes could be minimised.

Part B: Planning For Compatible Development:

The suggestion about use of measurements such as N70s is noted. ANEF Contours for Perth Airport are based around a theoretical level of aircraft movements at some future point in time (a level of aircraft movements which might never be reached, given the issue of peak oil, unless radical technological change is achieved), and around a runway configuration including a third runway, which we understand is not anticipated to be constructed within the next twenty years. While we understand the validity of the use of ANEF contours to protect the projected ultimate capacity of the airport, it can be difficult to explain to the public (including developers) who assume that the contours are related to current or near-future aircraft noise. Therefore, the use of more current aircraft noise measurements, for public information, makes sense. However, with respect to using such information or using more stringent criteria for applying land use controls, this has the potential to impact on much wider areas, so effective consultation on any such proposals would be essential and the Shire of Mundaring may or may not oppose such controls, depending on the details of what was proposed and the extent of affected area.

It is also noted that aircraft noise complaints are often received from outside of the ANEF 20 Contour. This can be for many reasons, including changing of flight paths or increases in flights. Increasing flights over areas that have had few flights in the past can have a significant impact on the amenity of those affected. For this reason it is crucial that there is effective community and stakeholder consultation regarding changes to flight paths or significant changes to the intensity of flights on particular paths. Recently, within the Shire of Mundaring and other adjacent areas, community concern has been expressed about new or more intensively used flight paths. It appears that public consultation regarding whatever changes have occurred has been inadequate. At the time of writing, the Shire is waiting for information from Air Services Australia on this issue.

With respect to Question 5 (the question asking whether residential development within a defined buffer zone should be referred to the Commonwealth for approval), the need for such a referral is questioned. If particular standards need to be complied with within a defined buffer zone, this should be clearly and publicly documented. The assessment of proposals against these standards and the imposition of requirements should be carried out by the agency approving the subdivision (currently in Western Australia this is the State government – by way of the Western Australian Planning Commission – although it has been suggested that there is a possibility this might change in the future for small subdivisions). Commonwealth approval should only be required if a proposal clearly breaches these standards or some discretionary judgement is required as to whether standards have been met (which should not often be necessary if the standards are clear and prescriptive). Also, it is presumed that “residential development” referred to in this question is residential subdivision. Individual residential developments (ie. not involving the subdivision of land) are usually approved by local government and should not have to be referred to the Commonwealth for approval.

Part B: Protection of Operational Airspace:

The Shire of Mundaring intends to incorporate OLS and PANS-OPS charts into its proposed new Local Planning Strategy, albeit that the Shire’s distance from the nearest runway and the nature of likely development in affected areas of the Shire are such that it is very unlikely a development which could unacceptably intrude into airspace would ever be proposed within the Shire. However, the Shire would have no objection to the inclusion of reference to OLS and PANS-OPS mapping into State Planning Policy, whereby it becomes a requirement in the State Planning Framework of Western Australia, which must be taken into account in planning decision-making.

Part B: Turbulence and Wind Shear:

With respect to Question 9, the Shire of Mundaring offers no comment, on the assumption that, with the nearest (proposed) part of a Perth Airport runway being over 3 km from the Shire’s boundary, it is assumed this issue would have no effect on the Shire.

Part B: Wildlife Hazards:

With respect to Questions 10 and 11, some concern is expressed regarding the radius given as an example (15 km) and what implications this may have. The Shire generally requires landscaping and revegetation to use locally native species. The Shire also supports the use of water-sensitive urban design in residential development, which may increase small areas of water for a short period after rainfall on or near the site of development. The Shire is also involved or supports revegetation projects that could fall within a 15 km radius of Perth Airport. The importance to public safety of avoiding birdstrike is acknowledged, but an overly cautious response to this issue could have

adverse implications for efforts to restore the local environment to a condition nearer its original (pre-European) natural state, and possibly also on the use of water-sensitive urban design to minimise erosion and protect the ecological health of waterways.

Part B: Wind Turbines:

There is no objection to the requirement to refer proposals for wind turbines within a given radius of an airport to the CASA for approval or comment. Any such requirement should be included in State Planning Policy. Any such requirement should also include qualifications (eg. wind turbines above a certain height), so as to avoid very small wind turbines being required to be referred.

Part B: Technical Facilities:

More clear direction is required as to precisely what facilities this refers to.

Part B: Public Safety Zones:

It is difficult to provide comment on this section without some rough idea of what distance from a runway might be included in a Public Safety Zone (while noting this could vary from airport to airport). As the nearest (proposed) part of a Perth Airport runway is over 3 km from the Shire's boundary, it is assumed this issue would have no effect on the Shire.