

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

Dear Mr. Dowie

Toll welcomes the opportunity to provide comment on the Commonwealth Government's discussion paper "Safeguards for airports and the communities around them".

Aircraft noise is an emotive issue in Australian cities, and care needs to be taken to properly manage residential development to ensure that the operation of Australian Airports are not unintendedly impeded due failure to adequately recognise the potential of community discontent whether founded on particular noise levels or not.

Toll believes that the current ANEF (Australian Noise Exposure Forecast) system does not adequately protect Australian Airports, especially those where flight paths are currently protected from residential development.

Australia, unlike any other country, is highly dependant on aviation services and the efficient operation of its airports. The air freight industry relies upon access to a network of curfew-free Airports in order to provide overnight delivery services and the ever increasing demands for prompt time critical delivery services.

We consider a new approach to safeguarding curfew-free airports from residential creep is required.

Toll's specific concerns are outlined below:

ANEF system failing to deal with inappropriate development proposals at Brisbane, Canberra, Perth Airports

A number of new residential developments have been proposed in greenfield areas under the flight paths around some of Australia's major airports, including Brisbane, Canberra and Perth. These proposed developments are intended to be in accordance with Australian Standard AS 2021, yet are located directly under the flight paths. Toll believes that if such developments are permitted to proceed, complaints will occur (especially in relation to overnight flights or operations) and future residents will seek changes to flight paths or other operational restrictions on the airport such as curfews. This would have a significant negative impact on overnight express freight industry, including Toll's operations in this regard.

The utilisation of airports for overnight freighter operations also reduces the potential for congestion, particularly in the morning and evening peaks, which would be exacerbated if freighter operating times were to be constrained.

ANEF does not protect the network of curfew-free Airports around Australia and has significant implications for night freight operators and customers.

The Commonwealth's Aviation Green Paper identified the need to maintain a network of curfew-free airports around Australia to enable (among other things) the efficient operation of an express overnight freight network. Toll welcomes this initiative.



Clearly, as evidenced by existing complaints by residents around Australia, overnight flights have added potential to be disruptive to residents living under flight paths, and this includes residents that are beyond the ANEF 20 line. This is particularly the case given night freight activity may only involve a small number of aircraft per night, insufficient to trigger a "response" from the ANEF system, yet more than enough to disturb/wake a resident living directly under the flight paths.

The ANEF system is thus inadequate to ensure that flight paths at non-curfew airports are protected, and to ensure the maintenance of a curfew-free network of airports around Australia. Land use planning standards thus need to recognise the difference between curfewed and curfew-free Airports; the current ANEF system is not able to provide this distinction.

We would welcome the opportunity to discuss this matter in more detail

Regards

A handwritten signature in blue ink, appearing to read "Noel Prosser", with a large, sweeping flourish underneath.

Noel Prosser
General Manager
Toll Air Express
Unit 1
154 O'Riordan Street
Mascot, NSW, 2020
Email: noel_prosser@tollgroup.com.au
Telephone: 02 8337 4539
Mobile 0419 359 390