

DEPARTMENT OF ENVIRONMENT AND CONSERVATION (WA)

COMMENTS ON DISCUSSION PAPER

SAFEGUARDS FOR AIRPORTS AND THE COMMUNITIES AROUND THEM

**Department of Infrastructure, Transport, Regional Development and Local Government
June 2009**

Introduction

The following comments have been prepared by the Noise Regulation Branch of the WA Department of Environment and Conservation, to address the noise issues raised in the Discussion Paper (Green Paper) "Safeguards for airports and the communities around them", prepared by the Department of Infrastructure, Transport, Regional Development and Local Government, dated June 2009.

Relevant issues

With regard to noise, the Green Paper focuses on the need for coordinated approaches to land use planning in order to avoid incompatible development, to avoid pressure on airports resulting from community reaction to noise impacts, and to preserve the amenity of surrounding areas. While the Green Paper addresses all airports, its emphasis is on the busier airports.

The potential options considered in the Green Paper are an enhanced national framework for land use planning; review of AS2021; and supplementing ANEF with other tools for describing aircraft noise.

The DEC view is that the issues causing pressure on airports are wider than just land use planning, as follows:

Managing impacts in high-noise areas – much of the direct pressure on airports comes from community representatives in high-noise areas, where such effects as significant impacts on amenity and long term health of residents, and impairment of children's education in schools, can be attributed to aircraft noise.

The Safeguarding Options should address strategies such as noise insulation programs for these areas, especially around those airports like Perth Airport which do not have a curfew and therefore are subject to high levels of night time noise.

Provision of clear information for new residents moving into noise-affected areas – many noise complaints come from new occupiers moving into existing noise-sensitive areas that are well outside the ANEF contours, and where it is not practicable to apply land use planning measures. In these areas it is important that clear and relevant information is provided to prospective occupiers. Significant steps have been made in this regard through the use of such descriptors as N65 and sites such as Webtrak. Perth Airport puts out a good information package with information about flight paths, the effects of noise on people, and so on.

Thus while DEC supports supplementing ANEF with other information tools, the Safeguarding Options need to include mechanisms – outside of the planning system – to get this information into the hands of the new occupiers.

Management of flight path changes and deviations – recent experience with Perth Airport has included the implementation of the WA Route Review Project, which has been marked by a lack of

clear information about the flight path changes and inadequate consultation with existing residents who are now noise-affected. This has resulted in significant unrest. Similarly, the community has a poor understanding of why deviations from established flight paths occur, and who is responsible for the resulting noise impacts.

The Safeguarding Options need to bring about a review of the processes used by the Civil Aviation Safety Authority (CASA), Airservices Australia (ASA) and the local airports to ensure that flight path changes, and deviations from established flight paths, are managed in an open and accountable manner.

Noise management at regional airports – these facilities comprise important infrastructure in a large State like WA, and are subject to noise-related pressures that can potentially impair their functioning. In particular, one of the major issues is flying training, which, by its unpredictable but persistent nature, can result in significant noise impacts.

The Safeguarding Options need to include the development of mechanisms to regulate noise emissions from this type of activity. One example might be a Regional Airport Noise Management Plan administered by the local government.

Strategies for land use planning

The Green Paper contains some discussion about the need for stronger planning arrangements for protecting flight paths, and queries the relevance of ANEF as the best basis for land use planning. DEC's view is that ANEF has a significant role in land use planning, but a limited one as an information tool.

With regard to land use planning for larger airports, DEC's view is that the use of ANEF represents a practical approach, as it provides a stable indicator that can be predicted for a future scenario with reasonable reliability. In WA, State Planning Policy 5.1: Land Use Planning in the Vicinity of Perth Airport, is based on the Ultimate Capacity ANEF for 350,000 movements, incorporating a future third runway. This is considered to be a good basis for land use planning. The development of a superior metric to replace ANEF would require a substantial noise study on the scale of the original study by the National Acoustics Laboratory (NAL) that spawned the ANEF.

With regard to smaller airports, DEC has long held the view that the ANEF approach is inadequate, as it does not deal well with the flying training activity or low numbers of very noisy events. The (then) DoTARS Discussion Paper (2003) "Going Beyond Noise Contours – Local Approaches to Land Use Planning Around Smaller Australian Airports" provided a range of practicable alternative approaches, including the use of a "Core Area" based on ANEF and a "Frame Area" based on the outer limits of the training circuits. This approach has been used in SPP5.3: Jandakot Airport. The Safeguarding Options need to include land use planning approaches based on the DoTARS paper.

Response to questions in Discussion Paper

The following comments are in response to the questions posed on page 8 of the Discussion Paper:

- 1. Does the ANEF system provide an effective basis for planning in noise affected areas?**
For large airports – Yes, but for smaller airports, No (see comments above). The ANEF for an airport needs to be developed in an open and accountable manner to ensure that the assumptions are acceptable to stakeholders, in particular State planning, transport and environment agencies, and affected local governments and communities. ANEF should not be replaced with an alternative that is not stable into the future, or that is unresearched.
- 2. How effective is the ANEF system as a land use planning standard for greenfield developments around airports?**

The ANEF can be considered effective in defining which greenfield areas are noise-affected into the future, by defining “conditional” and “unacceptable” areas. However, it is the effectiveness of the planning system itself, rather than the ANEF, that is relevant in preventing development in greenfield areas. The Safeguarding Options should consider the development of model planning policies for greenfield areas around airports.

3. Are the acceptable levels of aircraft noise for particular developments identified in AS2021 consistent with current community expectations?

DEC is not aware of any current Australian research that indicates otherwise, indeed the more recent community noise studies from Europe could be said to roughly confirm the annoyance results in the NAL study. However, the NAL study was conducted about 25 years ago, and there is a reasonable argument for a new major study to test this point. Certainly the experience with Sydney Airport was that the NAL study did not provide a good basis for predicting the reaction of communities to changes in aircraft noise exposure. DEC would support a Safeguarding Option that proposed a new noise study.

4. How can the current planning arrangement to address developments in noise-affected areas around airports and under flight paths be improved to take account of community expectations, while also providing for the reasonable growth of aviation activity at airports? The two SPPs in operation in WA have been in use for some years now, and there is a strong case for their review, based on the outcomes of the various planning decisions that have been made. The Commonwealth Government should consider undertaking a thorough review of the planning outcomes from all planning policies around airports in Australia, with a view to developing model planning policies for large and small airports.

5. For developments around the major capital city and freight airports, should state governments have to refer residential development within a defined buffer zone to the Commonwealth Transport Minister or Secretary for approval?

DEC would not support this, as the Commonwealth Transport portfolio would not have the local knowledge or planning expertise to make the best overall decisions, or to set appropriate development conditions. Currently, planning proposals around Perth Airport are referred to Westralia Airports Corporation (WAC) and DEC for comment, and both agencies have provided useful advice in many cases. Consequently, scrutiny at the Federal level is not considered likely to improve the process or the outcomes.