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City of **West Torrens**
Between the **City and the Sea**

6 December 2019

General Manager
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
Via email: safeguarding@infrastructure.gov.au

Dear General Manager,

Re: NASF Implementation Review

Thank you for the opportunity to contribute to the National Airports Safeguarding Framework Implementation Review.

As a key neighbour, local government service provider, customer, stakeholder (and now lessee) of the Adelaide Airport, West Torrens Council (Council) has long maintained an interest in the future plans for development of Adelaide Airport.

To this end, Council has a keen interest in better integration between the Commonwealth frameworks and legislation under which airport development is assessed and the state planning laws which determine land uses in the surrounding areas.

At its meeting held 19 November 2019 Council approved a response to the NASF implementation review, subject to subsequent amendments which have been reflected in the attached submission.

Should you have any queries regarding the submission, please contact Sue Curran, Manager Strategy and Business on 8416 6333.

Yours sincerely,

Terry Buss PSM
Chief Executive Officer
City of West Torrens

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NASF Implementation Review Response from West Torrens Council

Introduction:
Thank you for the opportunity to contribute to the National Airports Safeguarding Framework Implementation Review.

As a key neighbour, local government service provider, customer, stakeholder (and now lessee) of the Adelaide Airport, West Torrens Council (Council) has long maintained an interest in the future plans for development of Adelaide Airport. To this end, Council has a keen interest in better integration between the Commonwealth legislation under which airport development is assessed and the state planning laws which determine land uses in the surrounding areas.

Council Context:
The prominence of the Adelaide Airport Precinct as a major economic and employment generator in the State continues to grow, and as such, the flow on impacts to the surrounding land uses become increasingly complex to manage. The benefit of having a major capital city airport so convenient to the city, as is the case in Adelaide, requires potential impacts to be carefully balanced in order to 'future proof' the airport's location.

Council is committed to being the best place to live, work and enjoy life. Recognising the important role that the Adelaide Airport has to play as premium tourism and emergency services infrastructure and as a key precinct for employment, also requires a balanced approach to accommodating the community expectations of liveability in residential areas affected by the airport's air transport movements.

As a key voice for the community in City of West Torrens, Council has a role to play in advocating to the Adelaide Airport to consider minimising and/or ameliorating the impact of airport operations and aircraft movements on nearby sensitive land uses. Council sees its position is to leverage this role as a partner working in cooperation with Adelaide Airport, State Government and the Commonwealth Government to consider, and reduce, the impact Airport operations on surrounding residents and non-Airport land uses, and where possible reducing the opportunity for incompatible development in surrounding areas.

The NASF Guidelines, if properly implemented, would be particularly effective in future-proofing the location of the airport by promoting awareness and ensuring incompatible development is not encouraged or intensified in proximity to Adelaide Airport. Council's role in addressing the NASF guidelines is currently somewhat hampered by the South Australian Government's lack of uptake of the NASF Guidelines and implementation into the current and future Planning system.

South Australian State Context: South Australia's Planning and Design Code
The (SA) State Planning Commission and DPTI are currently undertaking the most significant Planning Reform in a generation, with a general goal of increasing residential densities. Additional residential development in close proximity to the Adelaide Airport (as with any airport) could end up stifling the growth capacity of the Airport, and increase noise complaints from residents.

A key opportunity has been missed to future proof the airport's location by planning for intended land uses around the airport that reduce the opportunity for additional dwellings and other sensitive development in Public Safety Areas and areas affected by the ANEF noise contours.
There are nine Guidelines in total, however, of the nine Guidelines, Council's comments focus on Guidelines, A, C, E, F and I.

Guideline A: Measures for Managing Impacts of Aircraft Noise
Aircraft noise can detract from a visitor's perception of a location, and be the source of daily disruption for local residents and employees. Council conducted an *Experiences of Aircraft Noise Survey*- while not a statistical sample size, it does provide insight into the specific concerns raised by residents in areas close to the airport. A report on the survey results will be enclosed with this response.

Although Council's Development Plan does not include the current ANEF mapping, it does include a policy reference to the Australian Standard AS2021, which enables the ANEF to be considered in planning assessments. Council has consistently lobbied the Minister for Planning and State Planning Commission to remedy this through the inclusion of the ANEF in statutory planning instruments.

Furthermore, a previous version of Council's Development Plan also included clear design techniques to provide guidance on ways in which to design dwellings to reduce the intrusion of aircraft noise into a dwelling or dwelling extension.

The SA State Planning Commissions' draft *Planning and Design Code* is due to supersede the Development Plan in July 2020. The draft *Planning and Design Code* currently on consultation shows an outdated 'area affected by noise' which is based on an outdated ANEF 30+ contour, and no indication of any of the updated ANEF contours. While it includes a stated performance outcome that, "...buildings or structures that are sensitive to aircraft noise (be) designed to minimise aircraft noise intrusion and provide appropriate interior amenity," it is void of policy that provides guidance on ways in which to design dwellings or other sensitive land uses to reduce the intrusion of aircraft noise.

Council's website has a page that provides advice on "Aircraft noise considerations for building or developing" and; an Aircraft Noise - building and renovating fact sheet
https://www.westtorrens.sa.gov.au/CWT/content/Building_and_planning/Buying_a_property/Aircraft_noise_considerations_for_building_or_developing

Furthermore, property searches (section 7 searches) provided to property purchasers during the process of buying a property include generalised information for potential purchasers to consider the impacts of the airport's location on the property.
Council publishes the ANEF on its external facing geographic information system mapping tool on its website.

Guideline C: Managing the Risk of Wildlife Strikes in the Vicinity of Airports
Risk of wildlife strike is one of only three factors considered in the 'Building Near Airfields' Overlay policy in the draft version of the Planning and Design Code released for public consultation. The Planning and Design Code does not specify development types that may be affected. Minimising the risk of bird strike by requiring an assessment of the keeping of pigeons and the like is currently considered in the Development Regulations 2008 (in areas of Airport Building Height mapping). There are opportunities for improvement to the draft Planning and Design Code Overlay and policy triggers to be improved so that the new Planning, Development and Infrastructure Regulations can be more effectively applied and when considering this type of activity in proximity to airports.

Guideline E: Managing the Risk of Distractions to Pilots from Lighting in the Vicinity of Airports
Managing the risk of distractions to pilots from lighting in the vicinity of airports is one of only three factors considered in the 'Building Near Airfields' overlay policy in the draft version of the Planning and Design Code released for public consultation. Once again, the Planning and Design Code does not specify development types that may be affected. The relevant policy refers only to outdoor lighting, and omits the potential hazard of glare from unpainted reflective iron.

Guideline F: Managing the Risk of Intrusions into the Protected Airspace of Airports
It is unclear whether the *Airport Building Height (Regulated) Overlay* proposed in the pending draft *Planning and Design Code* will be adequate to ensure assessments by relevant assessment authorities consider appropriate building heights- this layer triggers a statutory referral to DIRDC, however this does not address the statutory referral issues which were resolved by the Federal Government several years ago.

Guideline I: Managing the Risk in Public Safety Areas at the Ends of Airport Runways
Council's current position, with regard to Public Safety Areas (PSA) at the ends of the airport runways, is that it is the responsibility of the State Government to determine and implement a suitable response to Public Safety Areas on relevant land **external** to the Airport boundary, thus preventing increased development of additional residential or sensitive land uses that might otherwise further impinge future growth and operations of the Airport.

Council's City Prosperity aspiration in the Community Plan for accessible and reliable transport options includes a long term strategy to facilitate the healthy, safe and effective movement of people through the city. The City of West Torrens Community Plan highlights the community ambition to foster well-being and safety within the built form and maintain health and safety standards. NASAG Guideline I - Managing the Risk at Public Safety Areas at the Ends of Airport Runways, recommends recognising Public Safety Areas on Commonwealth land through the Airport Master Plan process, meanwhile external to the Airport boundary this risk is State Government's responsibility.

The South Australian State Government has not yet determined which model will be used to calculate Public Safety Areas and, therefore, Public Safety Areas were not mapped in the draft Planning and Design Code released for comment. As such, a position on public safety areas could not be decided in time for inclusion in AAL's preliminary draft Adelaide Airport Master Plan, which recently completed its public consultation phase.

Once the State Government has reached a decision on the appropriate model to be applied to calculate the Public Safety Areas, Council seeks a coordinated approach to identifying the affected areas both within, and outside of the Airport boundary.

Terms of Reference Question Responses:

Is the NASF reflected in policy, guidance and any other planning advice?
The draft *Planning and Design Code* includes the following policy or relevance to implementing the NASF Guidelines:

- Aircraft Noise Exposure Overlay
- Airport Building Heights (Regulated) Overlay
- Building Near Airfields Overlay

The Aircraft Noise Exposure Overlay is inadequately mapped within the West Torrens section of the draft *Planning and Design Code*, as it fails to implement the updated ANEF, instead referencing severely outdated mapping of ANEF 30+ contour.
The Airport Building Heights (Regulated) Overlay provides for referrals to the Department of Infrastructure, Regional Development and Cities in relation to buildings heights and with consideration to building generated turbulence and windshear which are not specific to the issues.

The Building Near Airfields Overlay, applies across the West Torrens Council area and has the effect of eliminating access to "Deemed to Satisfy" processing pathway, thereby requiring all applications undergo performance assessment. It provides limited additional policy against which to assess such development; notably missing the opportunity to identify public safety areas and ANEF contours.

Within the Council area the Overlay applies to development in all residential zones and some non-residential zones (a full assessment of implications external to the Council area has not been undertaken). All **residential** development in residential and non-residential zones triggers this overlay policy to be considered. However, **non-residential development** *outside of* residential areas may not trigger the overlay provisions, which is problematic given that the types of development listed in the policy, such as: food packing and processing plant, horticulture, waste transfer station etc. are non-residential uses that are more likely to be established outside the residential area, and therefore not trigger the policy.

As mentioned above, some elements of Guidelines A, C, and E (Aircraft Noise, Wildlife Strikes and Distraction from Lighting Glare) have been somewhat reflected in the new draft *Planning and Design Code* for South Australia in a new "Building Near Airfields" Overlay. The limited extent of the policy in this overlay is as follows:

DO1 - Management of lighting and bird attraction impacts on the operational and safety requirements of certified commercial and military airfields, airports, airstrips and helicopter landing sites.

Performance Outcomes and Deemed to Satisfy/ Designated Performance Outcome Criteria
PO 1.1 Outdoor lighting does not pose a hazard to commercial or military aircraft operations.
DTS/DPF 1.1 Development does not include floodlighting.
PO 1.2 Development likely to attract birds adequately separated from airfields to minimise the potential for aircraft bird strike.
DTS/DPF 1.2 Development incorporating one or more of the following land uses is located not less than 3km from the boundaries of the airport used for commercial or military aircraft:
a. food packing/processing plant
b. horticulture
c. intensive animal husbandry
d. showground
e. waste management facility
f. waste transfer station
g. wetland; or
h. wildlife sanctuary
PO 1.3 Buildings or structure that are sensitive to aircraft noise designed to minimise aircraft noise intrusion and provide appropriate interior amenity.
DTS/DPF 1.3 None are applicable
Procedural Matters- no referrals triggered by this Overlay.

Indications from Development Assessment staff who have road-tested the new draft policy confirm that additional information is required to guide the assessment process to ensure relevant aspects of the NASF are considered in the assessment process. While Council's Development Plan policy currently refers to *AS2021 Australia Standard - Acoustics—Aircraft noise intrusion— Building siting and construction,* the impending policy provides no such guidance. There is no guidance as to what development modifications may be deemed appropriate to address this overlay policy.

As the draft version of the *Planning and Design Code* is subject to change, it is also unclear if the scope of this overlay may be changed. The impact of this overlay and where it sits in a hierarchy of multiple overlays is not known at this early stage of the consultation on the *Planning and Design Code*- as the South Australian Department of Planning Transport and Infrastructure has yet to provide detailed advice to Council and/or Community Stakeholders, on the document which is already on consultation.

What impediments (if any) have there been to full implementation?
Policy needs to be evidence-based and navigate political and technical considerations to facilitate adoption. The evidence on which policy is based must be clearly articulated in 'lay-person' language so that it can be understood at all levels.

It is considered that the National Airport Safeguarding Framework's current status as merely a guideline which jurisdictions choose to follow voluntarily, contributes to a lack of adherence. If there was a way to provide incentives to abide by the guidelines, or disincentives to ignore them, adherence may be improved. If there was a way to provide incentives to abide by the guidelines, or disincentives to ignore them, adherence may be improved.

As an example of an incentive: a previous Federal Government scheme which provided funding for additional noise insulation to mitigate the impacts of aircraft noise to existing dwellings (in an area

roughly aligned to the 30+ ANEF current at the time) was popular and demonstrated a commitment at the Federal level to address concerns associated with aircraft noise.

Any specific case study to illustrate the impact of NASF on land use planning decisions.
The State Planning Commission and DPTI are currently undertaking the most significant Planning Reform in a generation, with a general goal of increasing residential densities. In South Australia where the capital city airport has grown up alongside residential development, the conflict between existing residential development and the growing airport is increasing. Council's survey suggests that since the larger international Jumbo Jets have been arriving at Adelaide Airport noise and vibration caused by aircraft traffic has become an increasing concern for residents.

A key opportunity has been missed to future proof the airport's location by planning for intended land uses around the airport that reduce the opportunity for additional dwellings and other sensitive development in Public Safety Areas and areas affected by the ANEF noise contours. It is also somewhat disappointing that a position on public safety areas could not be decided in time for inclusion in AAL's preliminary draft Master Plan 2019, which recently completed its consultation phase.

A previous version of Council's Development Plan included clear design techniques to provide guidance on ways in which to design dwellings to reduce the intrusion of aircraft noise into a dwelling or dwelling extension.

Encl x2
- Experiences of Aircraft Noise Survey Report
- Relevant policy in draft *Planning and Design Code*

Aircraft Noise Survey Outcomes Report- Presented to Council 6 November 2018

Introduction

A report on Aircraft Noise was presented to the 12 December 2017 meeting of Council **(Attachment 1)**. This report recommended

'1. ***Option 3*** *(use the ANEF contour map, recognise >25 ANEF as the threshold for managing aircraft noise and exclude land divisions in >30 ANEF) with additional prescriptive measures detailed in this report be adopted as Council's position on the management of aircraft noise which the Administration will use to influence the Department for Planning, Transport and Infrastructure's (DPTI) development of the new Planning and Design Code.'*

Option 3, as detailed in **Attachment 1** is as follows:

> **'Option 3 (Preferred Option)**
>
> *Use the ANEF contour map, recognise >25 ANEF as the threshold for managing aircraft noise and exclude land divisions in >30 ANEF.*
> This option results in no change to the treatment of those properties between 25 and 30 ANEF detailed in option 2 but does vary the requirements for properties within > 30 ANEF in that it prevents any subdivision of land in these areas. This would not apply to the replacement of existing dwellings or additions to existing dwellings.
>
> This option more closely aligns with *AS 2021:2015* and provides a greater balance between development potential and amenity (noise impacts). However, it will have the effect of limiting the subdivision potential of approximately 800 sites and would potentially be more limiting than the current system which is assessed on merit.'

Option 3 also proposed the following additional measures to give more certainty to applicants in terms of the acoustic levels that are likely to be achievable within a dwelling at a particular site:

- Development should be designed and located having regard to the flight paths, height restrictions and noise exposure forecasts issued by Adelaide Airport Limited.
- Residential development on land within the area defined by Fig R1/1 is affected by aircraft noise from Adelaide Airport and should be designed, constructed and insulated to minimise the effects of noise.
- Dwellings (and dwelling additions - where such additions have a floor area equal to or greater than 50 percent of the existing dwelling) are constructed in accordance with Australian Standard 2021-2000: Acoustics - Aircraft noise intrusion - Building siting and construction; or
- Dwellings (and dwelling additions - where such additions have a floor area equal to or greater than 50 percent of the existing dwelling) include the following construction techniques:

  a. shielding windows and doors with external blinds or verandahs;
  b. using masonry walls for external walls and if brick veneer construction is used fully, by insulating the cavity wall with 75 millimetres to 100 millimetres insulation (rockwool or fibreglass)
  c. keeping window size to a minimum and using at least 6 millimetres single glazing or double glazed windows; where possible, windows of sensitive rooms should be oriented away from the direction of view to the flight path;
  d. air-conditioning sensitive rooms using a split or ducted system. Wall mounted air-conditioning units should not be used as they provide a weak path for sound transmission;
  e. shielding doors with an entrance verandah and using a solid core construction;
  f. sealing airtight all cracks in the housing construction. Cracks between doors, windows and the house construction should also be weather sealed;

g. positioning air exhausts in non-sensitive rooms, e.g. wall vents should not be placed in bedrooms or living rooms; and
h. insulating the ceiling space with 75 millimetres to 100 millimetres ceiling insulation (rockwool or fibreglass)

Council deferred that report **(Attachment 1)** and resolved:

> *"As City of West Torrens residents are particularly affected by this aircraft noise policy position, Council writes to the Minister to advise that Council intends to undertake essential consultation with affected residents and request that no decisions be made with regard to the Aircraft Noise land use planning policy until such time as Council has completed that consultation and determined its position with regard to the management of aircraft noise."*

This report presents the findings of the consultation undertaken and was presented to the 16 October meeting of the Strategy and Community Committee meeting where it was deferred for consideration at the next meeting of Council on 6 November 2018.

Given the advancement to building techniques over time, the recommendation has been amended to be less prescriptive in terms of building techniques for noise attenuation to allow for those advances.

Discussion

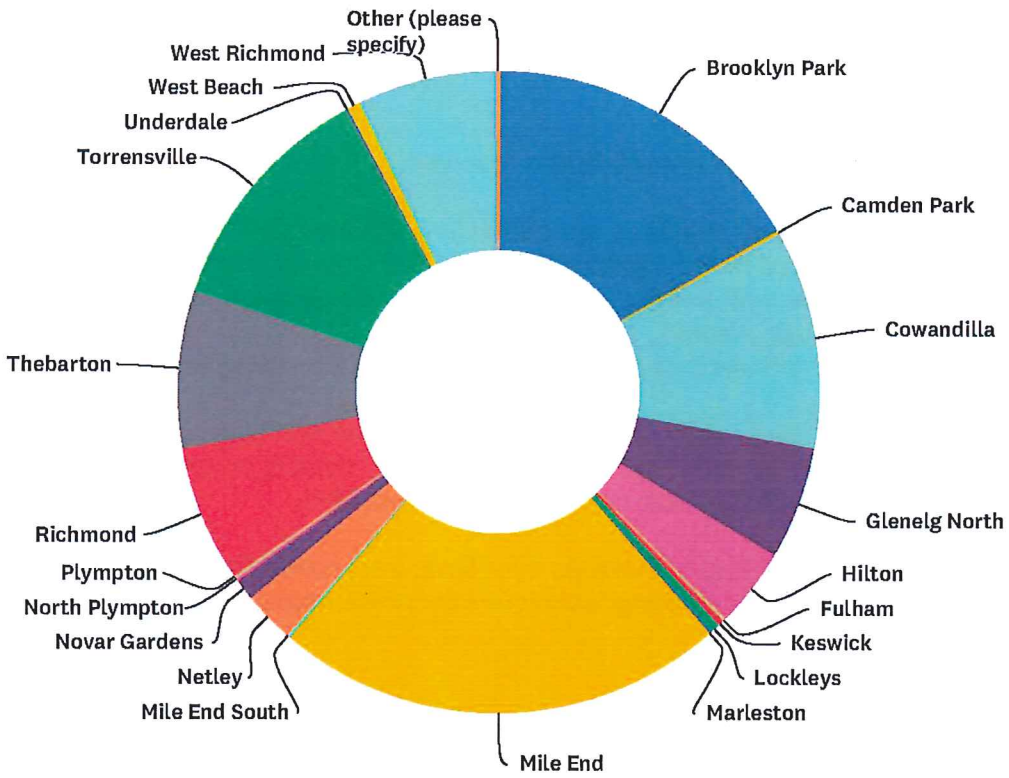
The 'Experiences of Aircraft Noise' consultation was developed as an online survey with the ability for residents to request a hard copy if required. More than 12,000 letters were sent to residents and property owners living **within** ANEF contours advising of the opportunity to participate and directing them to the online survey.

The survey was designed to canvass the range of experiences of aircraft noise felt by residents and property owners in West Torrens. The majority of responses were received from property owners with properties within the ANEF contour areas. Fewer responses were received from non-ratepaying residents some of whom lived outside of the ANEF contour areas. In total:

- 618 responses were received online
- 36 respondents provided input to the survey by phone or hard copy

The majority of responses were received in relation to the experience of aircraft noise in Brooklyn Park and Mile End (more than 100 responses for each suburb). This is roughly consistent with the fact that these suburbs are overrepresented in the ANEF contour areas. However, the survey provides valuable information of trends in responses and the wide range of experiences of those people living in the ANEF areas.

A breakdown of the survey response suburbs is shown in the chart below:

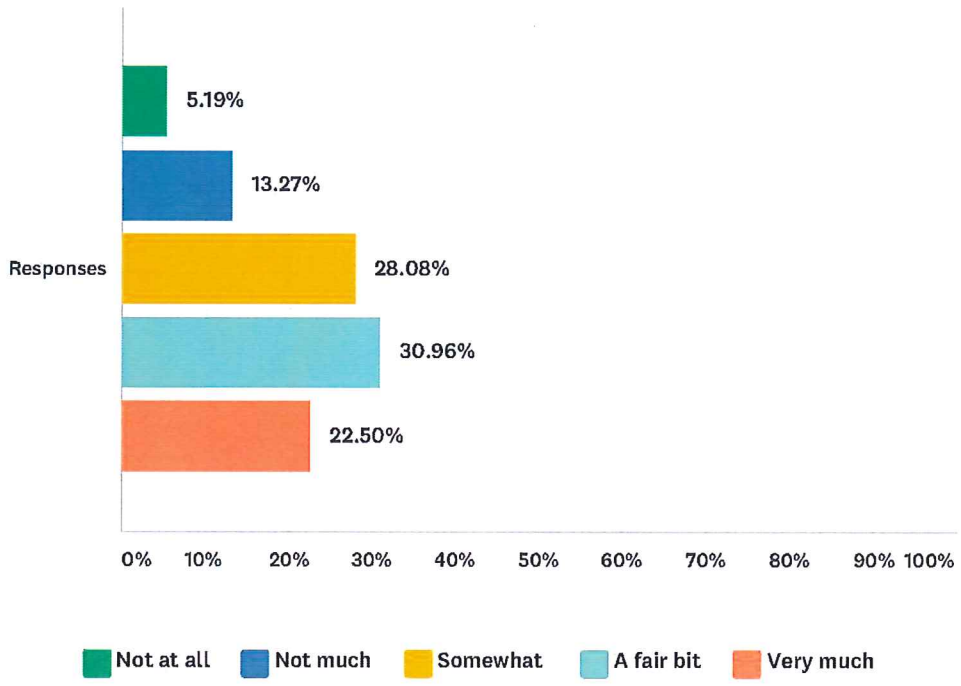


The questions canvassed decisions about moving in and buying in the area; with more than 50% of property owners in ANEF areas indicating that they would not buy in the area or might reconsider their purchase, based on current levels of aircraft noise.

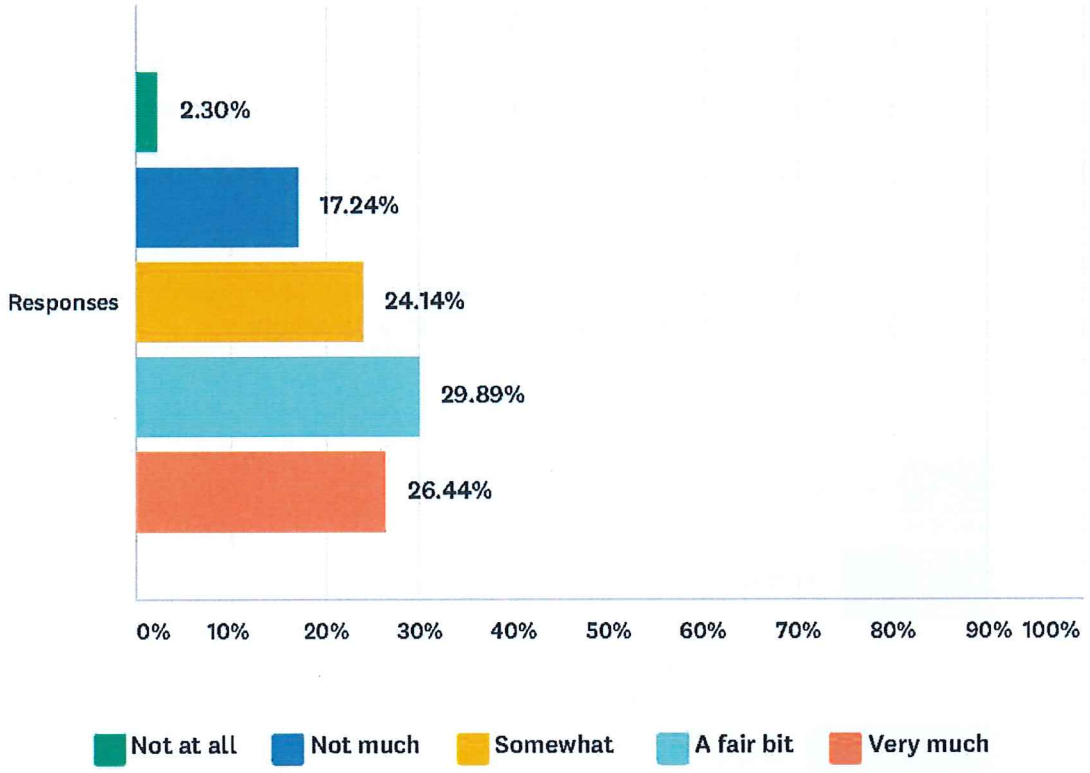
Extent of Aircraft Noise Impacts

The majority of property owners in ANEF contours indicating they were "somewhat" affected, or greater, by aircraft noise as shown in the graphs below:

Property Owners



Non-Owners



The effects did not vary considerably between owners and non-owners which would be expected.

The common effects stated in the comments section of the survey included:

- Noise
- Sleep
- Curfew

Some also stated health impacts but many stated no impact with comments that "you get used to it" or similar.

For those who did feel impacting by air craft noise, 'impact on sleep' was the highest single concern identified. The current curfew was indicated as a strong protective factor with some respondents specifically identifying that breaches of the curfew created problems for sleep.

Health concerns and impacts on quality of life (including the ability to focus on tertiary studies) were common experiences, with one extreme case indicating their child had to move out of the area to be able to concentrate on university studies, and another example at the other end of the spectrum suggesting a move would be required for comfortable retirement. Parents also cited aircraft noise as an issue for baby sleep routines.

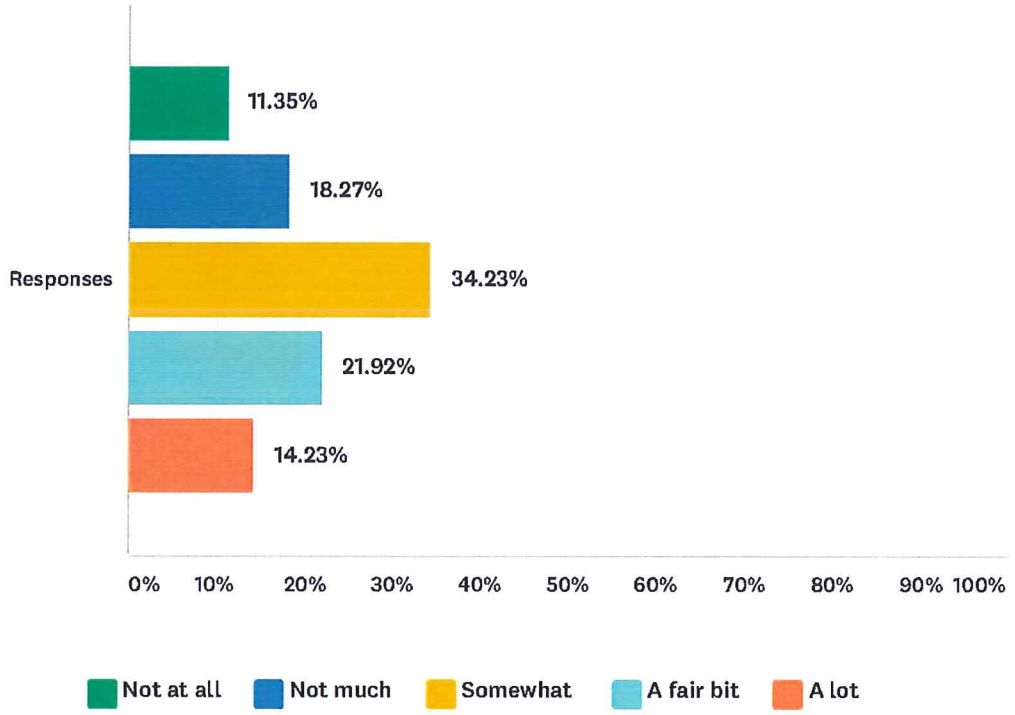
Furthermore multiple responses indicated that health impacts were not only tied to aircraft noise, but also the smell of aviation fuel vapours and perceived environmental contamination, such as sooty air and potential contamination of rainwater collected in tanks under the flight path. Multiple responses suggested additional trees in the area may assist to dissipate aircraft noise, and/or help purify and filter the air.

Vibrations, rattles and/or shakes felt in the household as aircraft fly overhead were experienced by a number of respondent property owners in the ANEF contour areas, and in some extreme cases cracks, window shattering and breakages were attributed to aircraft flying overhead.

Respondents also commonly experienced annoyance at interrupted television and radio listening as well as halted conversations and phone calls when flights passed overhead. Outdoor amenity and the ability to entertain outdoors in comfort was also compromised by the noise of flights.
A few responses also identified limitations of noise attenuation as the sole solution to aircraft noise.

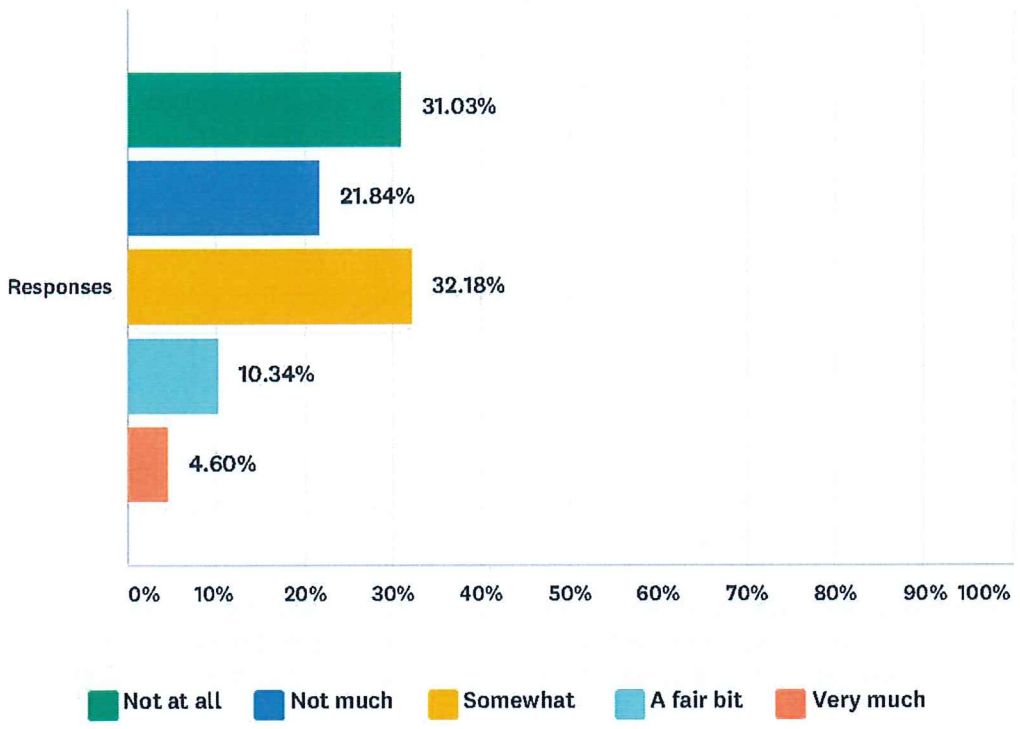
Consideration of Aircraft Noise in Purchasing Property or Moving Into Areas Affected by Aircraft Noise

Property owners were asked to what extent they considered proximity to the airport and the potential effects of aircraft noise when considering purchasing their property. The majority gave it at least some consideration (68%) with half of those giving it considerable weight.



A follow up question asked if the owner could go back in time, would they have purchased the property given what they experience now in terms of aircraft noise. Over 50% of the respondents said they may or would have reconsidered.

For non-owners, the consideration was considerably less with 53% not considering proximity or effects much at all.



However, 48% of non-owner respondents may or would have reconsidered their decision to move into an area affected by aircraft noise.

Causes of Aircraft Noise Impacts

Respondents had the ability to make any comments regarding aircraft noise and its impacts on their household. Many chose to comment on the causes of aircraft noise impacts which provided useful information when considering possible options for dealing with the effects.

Respondents in the ANEF contour submitted various experiences as to the key causes of the noise. Experiences indicated that the flight path had altered in recent times, with many responses suggesting flights that take off over the city, or land from over the city created the most noise while others found noise on the ground to be more of a disturbance.

Several long term residents that have lived in the area for ten or more years noted a considerable increase in noise in recent times. While several responses indicated that 'you get used to the noise after a while', some respondents indicated that it had reached a tipping point, where they were now no longer able to tolerate the level of noise.

Many responses indicated that larger aircraft tended to be more problematic with Emirates, Qatar, Cathay Pacific and Singapore Airlines all identified in multiple responses. A few responses made the observation that *some* larger aircraft actually have a quieter engine than other aircraft. While another response suggested that any new aircraft should not exceed the noise levels of existing aircraft that access the Airport. The increasing frequency of flights along with flights that fly low overhead were also cited as contributing factors in a number of responses.

Long term residents indicated differing experiences with aircraft noise and provided interesting perspective, many having lived in the area for more than 30 years, with at least one responder stating they had lived in the area for 56 years. Some long term resident/owners felt the situation was bearable as long as the curfew remained in place. However, many long term resident/owners indicated that noise and/or frequency of flights is increasing unreasonable and/or while it once didn't bother them, it is now becoming an issue.

Some long term resident/owners of land in the ANEF contours even expressed or indicated regret at having purchased in the area:

Meanwhile, respondents who identified themselves as long term residents/property owners were most likely of any responders to share the view that 'you get used to the noise'.

Potential Treatments and Solutions

Respondents made a number of comments which can be used to inform potential treatments or solutions. Most of these are outside of the control of Council but Council may have a role in influencing third parties such as the airport and State Government through the planning reform process to provide better outcomes for the community.

1. Communication

Several responses praised and thanked Council's efforts to provide a voice to the residents, with some expressing dissatisfaction at the level of information available and level of service provided by agencies tasked with addressing aircraft noise.

Furthermore, respondents indicated a desire for more open and transparent communication about Airport operations and aircraft movement, with a handful of respondents taking the initiative to indicate their interest in taking part on any future strategy development and/or consultation in regard to aircraft noise.

Council can continue to liaise with the Adelaide Airport through a number of existing channels and advocate on behalf of the community.

2. Airport Operations

The maintenance of the curfew was the single most mentioned concern. While the curfew was not mentioned in materials supporting the survey it seemed some residents saw this survey as an unofficial vote on the issue of retaining the curfew (or not). Interestingly, despite extensive media coverage of the Federal Government's proposed Public Safety Zones during the course of the survey feedback period, only 5 responses made reference to issues of safety in relation to proximity of runways proposed to be addressed through the NASF Guidelines on Public Safety Zones at the Ends of Airport Runways.

A large number of responses indicated that aircraft noise was tolerable, provided that the reprieve offered by the curfew is maintained. Some responses indicated additional hours of 'no flights' would be preferred, while others indicated without the curfew, they would move out of the area:
Some respondents even suggested how residents could be informed and how breaches of curfew and or changes to the curfew should be addressed to benefit the residents.

Suggested changes to operations included greater penalties for breaching curfew and encouraging aircraft modification to reduce noise.

A small number of responses suggested additional works that the Airport could undertake at their boundary to contain the impact of aircraft noise (particularly relating to landing, take off and engine testing on the ground) and also that Adelaide Airport needed to take greater responsibility for minimising aircraft noise.

Responses were divided over whether batching of flights had a negative or positive impact.

Alternate views that saw economic benefit in 24/7 airport operation were presented in fewer responses.

Council can continue to liaise with the Adelaide Airport through a number of existing channels and advocate on behalf of the community.

3. Relocate the Airport

Other responses suggested moving the airport altogether. Land to the north of the Adelaide metropolitan area was the favoured location for a relocated airport (a variety of locations were suggested including Parafield, Edinburgh, north of Two Wells, near Gawler and generally 'North', with one suggestion for Normanville in the south.

Some responses indicated an acceptance that the airport in this location was here to stay, meanwhile, significantly fewer responses suggested a buyer beware approach.

As Council has no influence on the location of the airport, no action is recommended.

4. Policy Positions

4.1 Land Uses in ANEF Areas

A free text response was available for survey respondents to make suggestions as to what type of development/properties/land uses may be suitable in areas affected by aircraft noise.

Responses provided several suggestions as to alternate uses in and around the current airport land. Justification for the status quo and pro-development sentiment featured in some responses. Alternate views submitted included some responses that acknowledged the economic benefit of having the airport located so close to the city and responses that presented an optimistic outlook on the ability for residential to happily co-exist with the airport.

Responses from property owners varied considerably, with some popular responses including industry/warehousing, commercial and shopping centres/retail. However, the opposite view was also expressed with concern regarding encroachment from non-residential uses, as expressed in this response received:

"I would be totally opposed to increasing commercial use in these areas. My observation of the commercial property development has been that it detracts from the amenity of nearby residential areas."

Several responses indicated that residential was fine, or just keep things the same. Equally popular were mentions of residential land uses ***that included noise attenuation***.

Other common responses included:

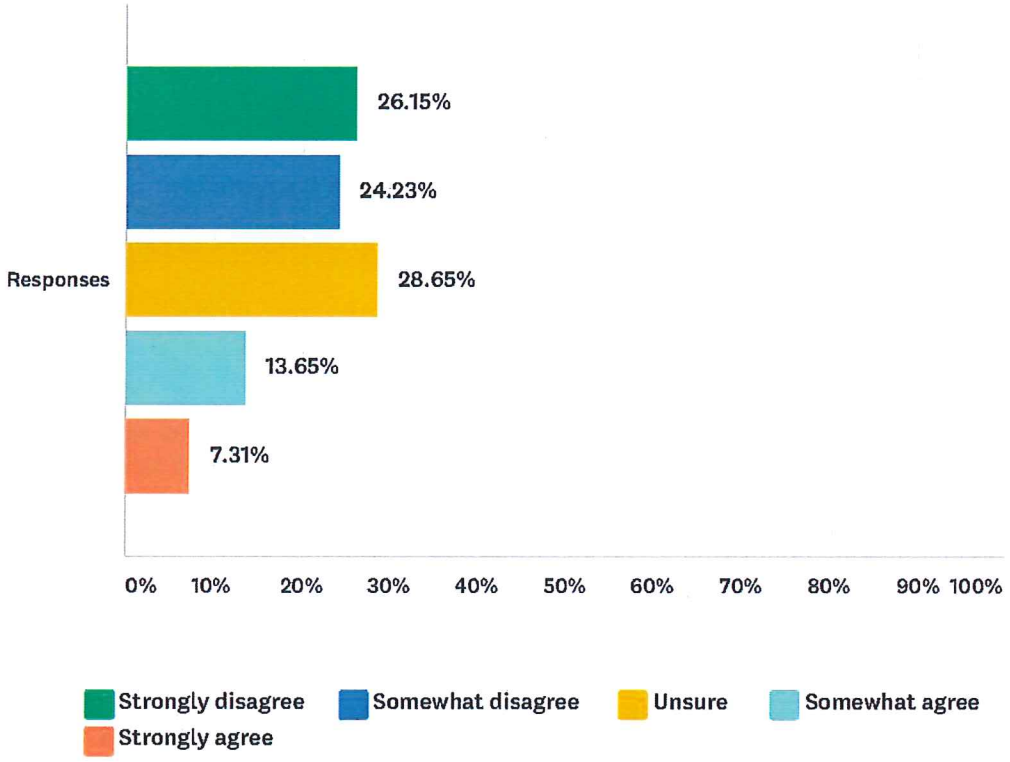
- Gardens and parks (including some suggestions for carbon offsetting), sporting, recreational and golf course.

There were also several mentions of the potential benefits of street trees and greening to reduce the impacts of, not only aircraft noise, but also potential odour and pollution from aviation fuel drop.

Progressive suggestions that build on the economic development and tourism benefits of the airport included:

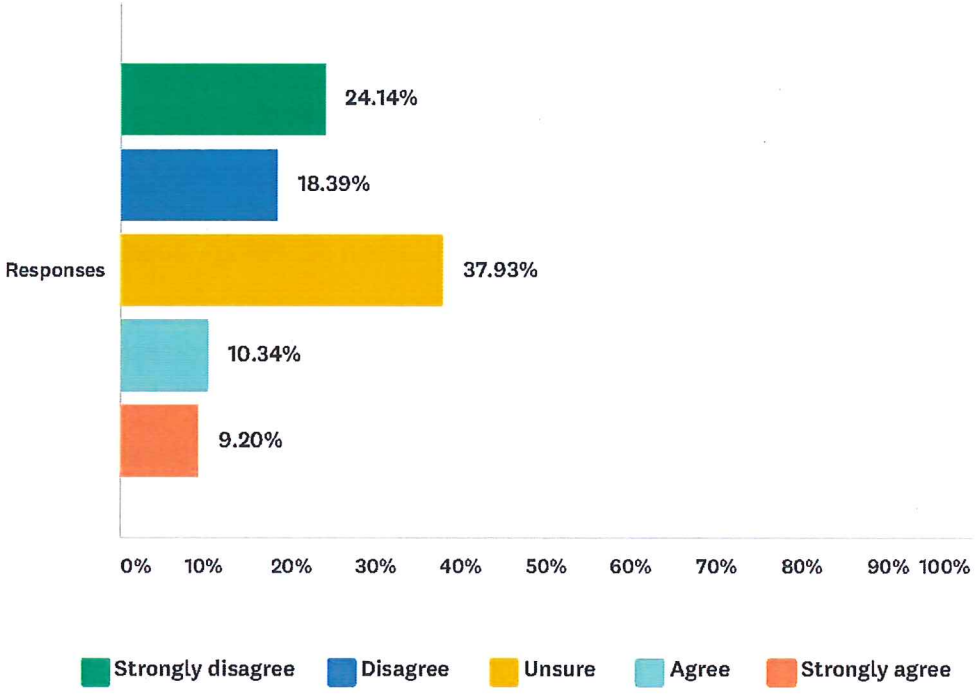
R146: "More facilities after hours locally for airport workers e.g. gyms, eateries, close to the airport (noisiest area) rather than residences."
R117: "...some sort of park for "plane spotting"... (including)... "fixed features of binoculars and information about planes... a nice positive highlight about our proximity to the airport and this good asset we have in our area."

4.2 Development in Areas Affected by Aircraft Noise
The survey included a question on whether people agreed that the planning system should be encouraging more people to live in areas where aircraft noise may be experienced by allowing more houses to be built in these areas. Approximately 50% of property owners disagreed or strongly disagreed with the statement and only 20% agreeing that it is a good idea as shown in the graph below:



This was coupled by 72% of property owners stating they were unlikely to or definitely not going to subdivide in the next 10 to 20 years.

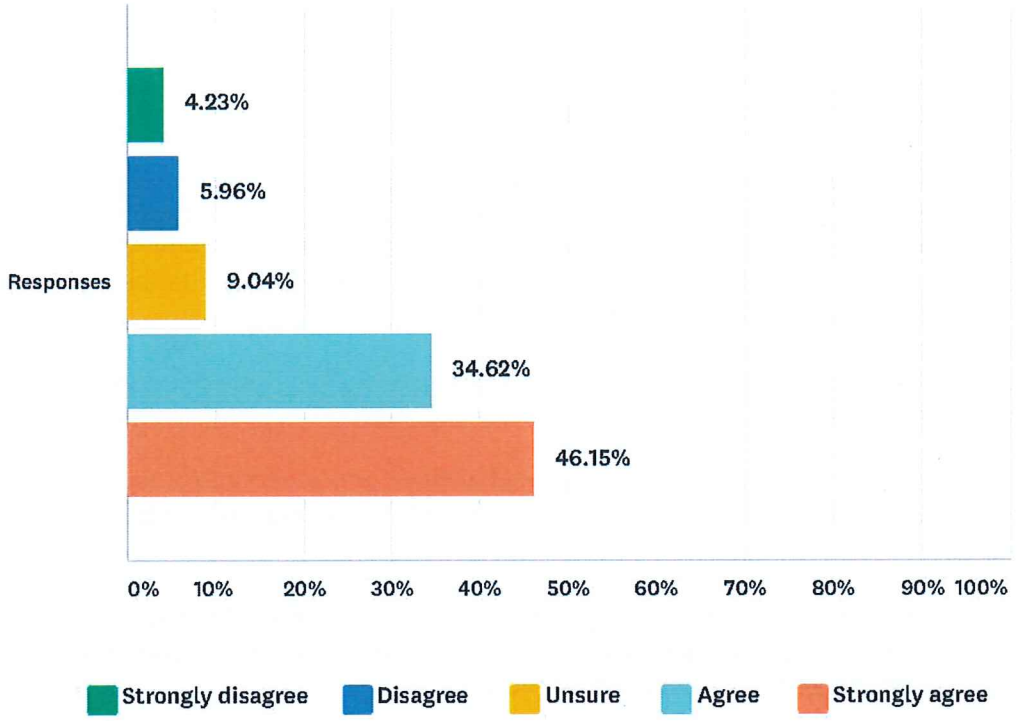
A large proportion of non-owners (42%) also disagreed that the planning system should encourage more people to live in areas affected by aircraft noise.



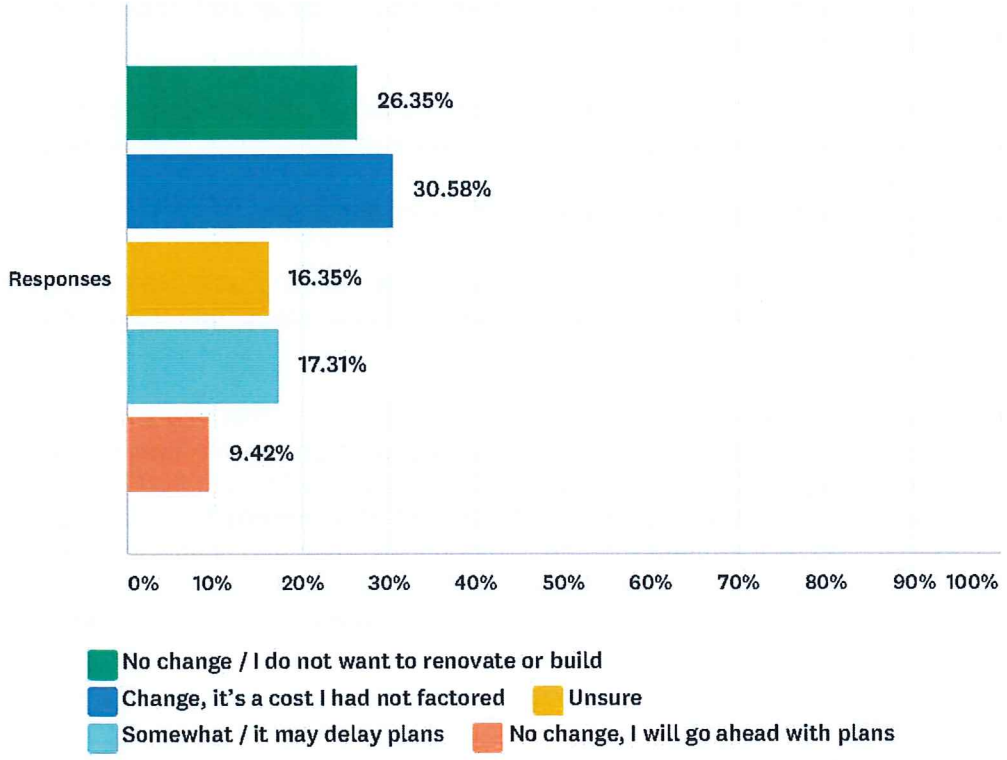
4.3 Noise Attenuation and Grants

Less than 25% of responses indicated their property had noise attenuation. In a subsequent question, the majority (81%) of property owner responses in the ANEF contours agreed or strongly agreed that new homes under the flight path should be required to be built in a way that prevents or minimises the occupants' experiences of aircraft noise.

Around 10% of property owners in the ANEF contours (53 responses) disagreed or strongly disagreed.



However, the cost of noise attenuation measures would discourage a significant proportion (57%) from renovating or building a new dwelling on their property. Responses presented differing views on the tension between noise attenuation as a solution, and building costs in the area.



Many responses indicated support for the concept of additional building insulation, double glazing and use of construction materials that ameliorate aircraft noise. The majority of such responses also indicated a preference that the subsidy be reinstated.

Several responses suggested mechanisms by which noise attenuation could be funded, including fines for breaches of curfew to fund grants.

Fewer responses included consideration of elements in the public realm which may assist with noise reduction. Such suggestions include increased tree canopy to filter air and assist dissipation of aircraft noise.

4.4 Current Planning Considerations of Aircraft Noise

The current process for planning applications is that for applications in the ANEF ≥25, an acoustic report is requested which details recommendations for measures for the building work to meet AS2021 and these recommendations shall be included in the design of the building. While the process for ≥25, ≥30 and ≥35 vary somewhat, the basic premise is that there must be demonstration that the development can achieve compliance with AS2021.

Decisions of the ERD Court identified that the current Development Plan does not contain sufficient rigour to refuse land divisions in ANEF ≥30, however, meeting AS2021 is a requirement.

Consequently, the current planning approach is that land division in the >30 ANEF area have been approved with consideration of noise attenuation being left until the assessment of the built form (dwelling) application.

This approach is different to the proposed policy position and interpretation of the Australian Standard that is now recommended in this report to most effectively balance the outcomes of the survey, community aspirations and the Australian Standard.

4.5 Future Directions

It is likely that the issue of development within ANEF contours and around the airport in general will be considered in the Planning and Design Code. The Aircraft Noise Survey was designed to inform Council's policy position in relation to development in areas affected by aircraft noise. The survey results showed a majority support for:

- Not encouraging more building and residents within the areas affected by aircraft noise
- Ensuring noise attenuation measures are a requirement of new homes built in the areas affected by aircraft noise
- Consider alternative land uses in areas affected by aircraft noise

This position is supported by the NASF Guideline - Managing the Risk in Public Safety Zones at the end of Runways which actively discourages having people located in areas 1km from the end of airport runways.

The position is more restrictive than the under the current Development Plan and it is likely to be at odds with the State Government's infill targets. Balancing these competing priorities is challenging but Council has an opportunity to influence the outcomes through the Planning and Design Code. It is proposed that the position contained in recommendation 1 of **Attachment 1** be used to influence the Planning and Design Code as it supports the findings of the survey and is still consistent with Table 2.1 of *AS2021-2015* (table included in **Attachment 2**). However, it should be recognised that while this may be the position advocated by Council, there is no guarantee this will be incorporated into the Code.

Additional Considerations

The ANEF contours above ANEF 25 need to be spatially recognised in a layer in the Planning and Design Code so that potential purchasers and developers can be aware of the potential for aircraft noise and make informed decisions and consider appropriate acoustic measures when developing, redeveloping or renovating property in areas likely to be affected by aircraft noise.

All homes in areas most affected by aircraft noise (new residential development in contours greater than ANEF 25) are required to meet AS2021 to ensure liveability and appropriate acoustic treatment for internal comfort.

Currently, there is no trigger in the assessment system to pick up the issue of potential aircraft noise issues for any development progressed under the ROSAS scheme (State Government's Renewing our Streets and Suburbs program) and Residential Code Development. It is considered that this is not only an unfair loophole but that it is a reasonable expectation that all development meet the AS2021 requirements. This is to ensure that amenity and public health of new and existing residents are not unreasonably impacted upon by the Adelaide Airport but to enable compatibility as best as possible between the two land uses.

Alternatively, the current Minister's Residential Development Code layer should be updated to ensure properties in ANEF 25+ are **not included** eligible for Minister's Residential Code Development, and therefore not encouraged for development and further sub-division.)

Design Techniques which are known to assist in reducing internal acoustic noise be included in the Residential Development Code as a guide for those designing new development in areas most affected by aircraft noise. Again, with reference to ANEF contours rather than Overlay Map depicting Areas affected by aircraft noise.

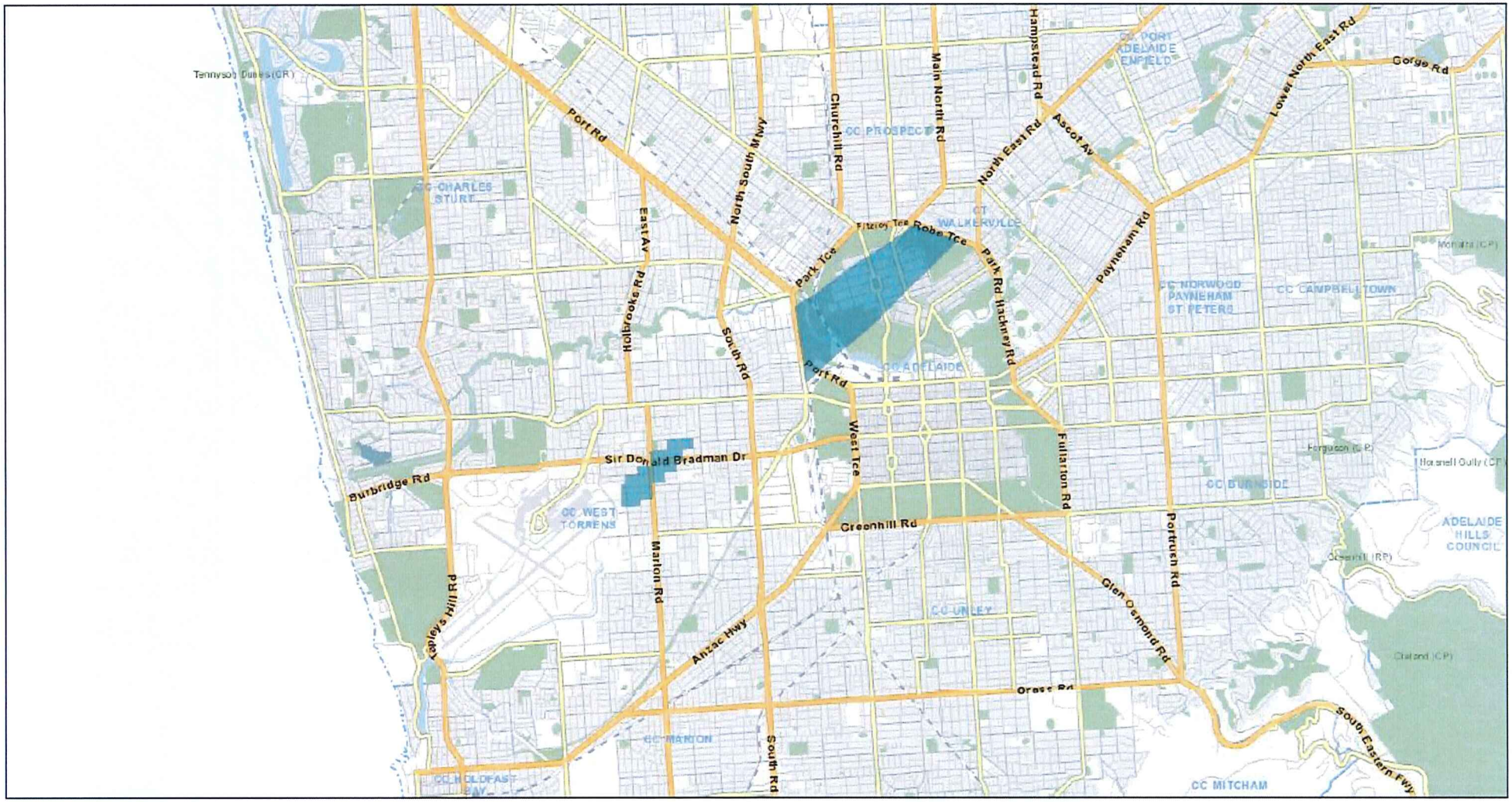
In addition, Council's strategic plans around open space and green cover as well as other public realm design elements can assist to improve the quality of life for the community within areas affected by aircraft noise.

The findings of the survey did not present any significant surprises, however the community appreciated the opportunity to share their experiences.

Conclusion

This report presents the outcomes of the 'Experiences of Aircraft Noise' consultation and proposes a policy position, with respect to aircraft noise, to be used to influence DPTI's proposed *Planning and Design Code*.

SA Planning and Design Code Aircraft Noise Overlay Map for inner metropolitan Adelaide area



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Aircraft Noise Exposure Overlay

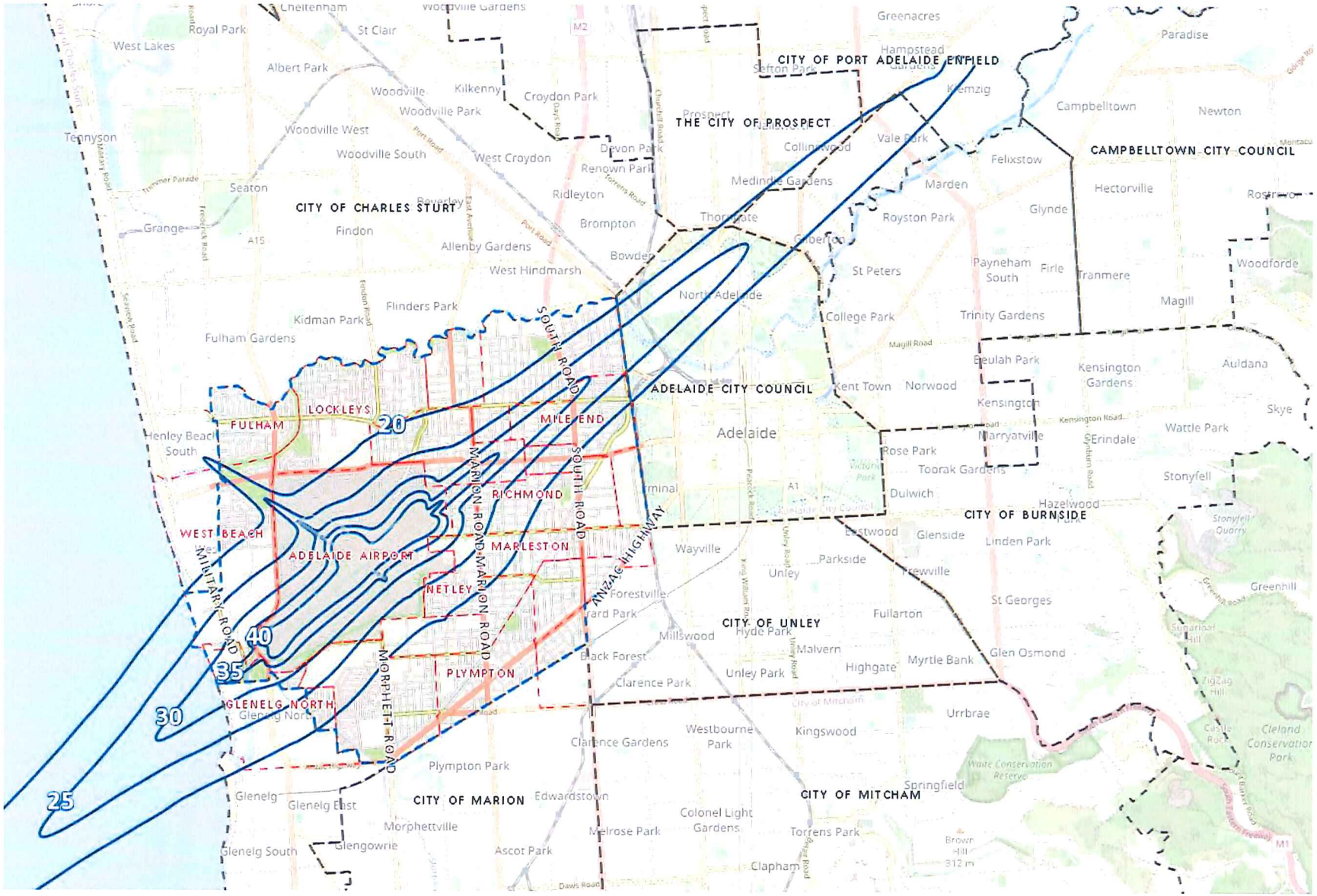
1:72,224

0 4,750 9,500 19,000 ft

0 1,450 2,900 5,800 m

Note: Blocked out area in the City of West Torrens, (outdated) noise contour mapping starts from the City of Adelaide Council Boundary - noise contour mapping stops abruptly at Robe Tce at the City of Adelaide Boundary. Current ANEF not indicated

Current data: ANEF Ultimate Practical Capacity forecast



Note: Much larger areas of metropolitan Adelaide and especially WTCC will be impacted