



MASTER BUILDERS
AUSTRALIA

Submission to

**Rural and Regional Affairs and Transport References
Committee**

on

**Inquiry into the effectiveness of Airservices Australia's
management of aircraft noise**

May 2010

Master Builders Australia Ltd

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building australia



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1 INTRODUCTION

- 1.1 This submission is made by Master Builders Australia Ltd (Master Builders).
- 1.2 Master Builders represents the interest of all sectors of the building and construction industry. The association consists of nine State and Territory builders' associations with over 31,000 members.
- 1.3 Its primary role is to promote the viewpoints and interests of the building and construction industry and to provide services to members in a broad range of areas including training, legal services, industrial relations, building codes and standards, industry economics and international relations.

2 PURPOSE OF SUBMISSION

- 2.1 This submission is focused on land use planning in the vicinity of airports and the critical importance of strengthening the evidence based approach to decision making under the current ANEF system to ensure that the interests of all the key stakeholders are properly protected.
- 2.2 Master Builders supports land use planning in the vicinity of airports in accordance with Australian Standard AS2021-2000 and the ANEF system. The standard ensures the long term viability of airports and protects the community from unacceptable levels of aircraft noise and provides certainty for planners, builders and developers and airport operators.
- 2.3 Master Builders is concerned that governments and their agencies are alert to the effect of public policy decisions that may negatively impact on housing affordability.

3 THE CRITICAL IMPORTANCE OF HOUSING AFFORDABILITY

- 3.1 Decent, affordable housing for all Australians has been a goal of all Commonwealth Governments since Federation. It is a key policy objective of the Rudd Labor Government. The importance of striving towards this goal cannot be underestimated. As well as providing shelter, secure housing helps people to cope with economic, social and health issues.
- 3.2 Home ownership is an integral part of Australia's social and economic fabric. It has contributed much to the social harmony and stability which has fostered improved socio-economic outcomes. These benefits include greater incentives for civic

involvement, security of tenure that increases community participation and minimises disruption to social networks, reduced incidences of socially disruptive behaviour and reduced welfare dependency. This is why the role of home ownership as a public good has always been recognised by all governments.

- 3.3 Master Builders Australia is strongly committed to improving housing affordability and called on all governments to embrace a package of reforms including: improved land release, stream lined planning approval processes and the reduction of unnecessary red tape.
- 3.4 Given the strong inter relationship between demand and supply; it is critical that governments and their agencies work to address the core structural problem affecting housing affordability, which in the main are supply-side constraints.
- 3.5 Master Builders Australia has put these concerns in a detailed submission to the recent Henry Review of Taxation and has made 13 key recommendations to improve housing affordability including the critical importance of enhancing the accountability and transparency of the approvals process.
- 3.6 A recent key decision of COAG was to make housing a priority for microeconomic reform for 2010 with Treasurers to lead the development of a housing reform agenda with Housing and Planning Ministers. State and Territory Treasurers have been tasked with the job of developing a reform agenda to tackle housing supply and affordability issues. States and Territories also agreed to have capital city strategic plans by 2012 that will be independently assessed by the COAG Reform Council.
- 3.7 Master Builders therefore believes it is important for all government agencies to be acutely aware of the Government's broader housing affordability policy objectives and the need for pursuing objective and transparent processes.

4 LAND USE PLANNING IN THE VICINITY OF AIRPORTS

- 4.1 Master Builders recognises the importance of airports to communities and the significant social and economic contributions they make. It is important that airports are able to meet the needs of the community without unnecessarily being constrained by incompatible surrounding development. Conversely, the social and economic benefits of development around airports at the same time should not be excessively constrained.
- 4.2 Master Builders understands that Australian Standard AS 2021-2000 was designed as a land use planning standard to achieve both of these goals. AirServices Australia's

policy document "***The Australian Noise Exposure Forecast System and Associated Land Use Compatibility Advice for Areas in the Vicinity of Airport***" (Sept 2001) states that, "*it is considered that the public interest is best protected by ensuring that the long-term viability of the aerodrome is preserved wherever possible by planning in accordance with the guidance material contained in this document. The land-use recommendations in Appendix B are most readily applicable to new development on undeveloped land around aerodromes.*" (p 4)

- 4.3 AS AS2021-2000 defines the Australian Noise Exposure Forecast (ANEF) System. Application of the ANEF system and produces a series of contours that represent different levels of acceptability of aircraft noise. The ANEF contours are developed based on long term projections of future operations at a particular airport. Input data includes aircraft movement projections; runway configurations; operating times (eg day or night); aircraft used; flight paths and local topography. The resulting ANEF contours are local representations of the long term forecast noise exposure around a particular airport. AS 2021 defines appropriate building uses for each ANEF contour. For example, residential uses are generally not acceptable inside the 25 ANEF contour.
- 4.4 AirServices Australia's "***Guidelines for the Production of Noise Contours for Australia Airports***" (November 2001) states: "*It is Australian Government policy that ANEF contours and the associated land use compatibility advice be used as the land use planning criteria around Australian airports.*"
- 4.5 Master Builders accepts that the ANEF system is the most stringent land use planning standard for areas in the vicinity of airports in the world. It provides certainty to airport lessees, the public, and planning authorities and provides confidence to industry to invest in the infrastructure required for development. The ANEF and Australian Standard AS 2021 have been adopted in legislation and planning policy by all relevant planning authorities around Australia.
- 4.6 The importance of the ANEF system is the objective and transparent approach it provides which is important to all the stakeholders in providing confidence and certainty.
- 4.7 AS 2021 was prepared by Australian Standards Committee EV/11. The following interests (among others) are represented on this committee:
- AirServices Australia (chair)
 - Association of Australian Acoustical Consultants

- Australian Acoustical Society
 - Department of Defence, Australia
 - Local Government Association of NSW
 - Sydney Airports Corporation
 - Australian Mayoral Aviation Council
 - Institution of Engineers, Australia
- 4.8 AS 2021 was first introduced in 1977 and has been reviewed several times but no major amendments have been made since 1985.
- 4.9 We are aware of the most recent independent authoritative review of the ANEF system which was undertaken in July 2009 by NATS, the British equivalent of AirServices Australia. NATS is considered a world-leading Air Navigation Services Provider, and provides air traffic services to 15 of the UK's leading airports, and expert aviation consultancy services worldwide. In its *"Response Prepared for the Australian Department for Infrastructure, Transport, Regional Development and Local Government"* on the Commonwealth's *"Safeguards for Airports and the Communities around them - Discussion Paper"*, NATS stated, *"the ANEF system is considered as an appropriate land use planning tool. It is difficult at this time to see a better alternative."* (p 13).
- 4.10 Master Builders agrees with this conclusion.
- 4.11 In relation to the effectiveness of the ANEF system as a land use planning standard for greenfield developments around airports, NATS stated, *"As a methodology for restricting development or specifying conditions for development, such as the appropriate level of commensurate insulation required, the ANEF system, or similar energy average index is considered suitable. The ability to correlate noise exposure level to significant community reaction/annoyance, and in particular understand the percentage of people affected provides a suitable basis for effective planning."* (p 13)
- 4.12 The ANEF system was not however designed for describing the effects of aircraft noise to the layperson. This issue was considered at length in *"Expanding Ways to Describe and Assess Aircraft Noise"* (2000) produced by the Department of Transport and Regional Services. This paper recommended metrics in addition to the ANEF for describing the effects of aircraft noise. Most recently endorsed Airport Master Plans include plans that use these additional metrics.
- 4.13 In relation to land use planning however, the paper states: *"This paper is not an*

attempt to replace the ANEF system as a planning tool. The ANEF system continues to be the most technically complete means of portraying aircraft noise exposure and the Department is not proposing any changes to the land use planning principles and restrictions embodied in Australian Standard AS2021” (p v)

- 4.14 The recent “*National Aviation Policy White Paper*” (December 2010) confirms the status of the ANEF system. It states: “...*the Government therefore will: retain the current ANEF system in Airport Master Plans as a land use planning tool around leased federal airports*” (p 212).
- 4.15 Master Builders also supports this policy position.
- 4.16 Since the privatisation of airports in 1998 there has been greater scrutiny of and challenges to the ANEF system and its application to the protection of airports. That in itself is not the concern but the apparent lack of objectivity of the process where it is contested.
- 4.17 Master Builders believes in contestability as best practice in the pursuit of public policy where objectivity and transparency are paramount considerations. The ANEF system provides for an evidence based framework for decision making. To deviate from this system runs the risk of an unscientific and ad hoc approach being taken with the potential for poor public policy outcomes as an outcome.
- 4.18 Master Builders would not like to see the abandonment of the ANEF system because of the risks to good public policy decision making and potential for negative outcomes for the community including:
- Uncertain and combative land use planning processes;
 - Uncertainty for the community and the development industry and the impact on investment decisions;
 - The sterilisation of more land in the vicinity of airports, which would unnecessarily drive up the cost of residential land (decreasing house affordability – a key concern of both the Commonwealth and State Governments);
 - Increased requirements for road, rail and other transport infrastructure to facilitate transport around the more widely dispersed metropolitan areas and the impact on state and federal budgets for additional funding to meet these costs;
 - Increased usage of fossil fuels and CO₂ emissions as a result of the more widely dispersed metropolitan areas, thereby resulting in a negative environmental outcome;

- Lower metropolitan residential densities, as higher density housing is ideally located around key transportation and employment hubs
- Increased validity for any complaints that may come from areas that are currently within acceptable noise zones.
- Potential for costs to the Commonwealth Government related to having to retrofit existing communities within the new, larger aircraft noise exposure areas, such as programs similar to that in place around the Sydney and Adelaide Airports.

5 KEY RECOMMENDATIONS

- 5.1 Master Builders in support of the ANEF and the continuing need for objectiveness and transparency recommends a number changes.
- 5.2 The National Aviation Policy White Paper, the Commonwealth Government has acknowledged that it needs to introduce a process to ensure that the input data is independently verified. Page 212 of the White Paper states that the Government will *“improve the technical processes and independence associated with the assessment and scrutiny of ANEFs”*.
- 5.3 This one of the weaknesses in the current process of preparing ANEF contours which needs to be addressed. Currently, private Airport Lessees have sole responsibility for the input assumptions used to produce ANEF contours, such as aircraft types, flight paths, runway operations and times of operations. AirServices Australia has the responsibility of endorsing the ANEF contours prepared by airport lessees but the endorsement process does not include an assessment of the reasonableness of the assumptions made by the private Airport Lessee.
- 5.4 Master Builders contends that to improve the public policy decision making process, other industry and community input be allowed by the Aircraft Noise Ombudsman relating to flight, operational and aircraft type assumptions, and that these assumptions be properly tested by the Aircraft Noise Ombudsman, in the preparation of Airport Master Plans.
- 5.5 Currently ANEF’s become part of State planning law once they are endorsed by AirServices Australia. The approval process for Aircraft Master Plans takes a further year following the ANEF endorsement by AirServices, creating a hiatus during this period. Master Builders recommends that the two processes therefore should be combined. Approval of an Airport’s ANEF should be concurrent with approval of the

Airport's Master Plan.

- 5.6 Master Builders would also support the initiative in the National Aviation Policy White Paper to establish an Aircraft Noise Ombudsman. Master Builders further recommends that the Ombudsman have the scope to investigate all matters relating to aircraft noise. Further to ensure complete transparency, the Ombudsman should be independent of Airservices and report direct to Parliament.

6 CONCLUSION

- 6.1 Master Builders supports land use planning in the vicinity of airports in accordance with Australian Standard AS2021-2000 and the ANEF system. The standard ensures the long term viability of airports and protects the community from unacceptable levels of aircraft noise and provides certainty for planners, builders and developers.
- 6.2 Master Builders believes that the ANEF system should to be enhanced to ensure that Australia has a best practice public policy decision making framework that properly protects all of the key stakeholders.
- 6.3 Master Builders believes it is important for all government agencies to be acutely aware of the Government's broader housing affordability policy objectives and the need for pursuing objective and transparent processes.