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Committee Members  
Rural and Regional Affairs and Transport References Committee  
CANBERRA ACT 2600

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Dear Committee Members

**Re: City of Salisbury submission - Inquiry into the Impact and Mitigation of Aircraft Noise**

The City of Salisbury, South Australia thanks you for the invitation to submit to the Inquiry.

The City of Salisbury is a suburban Council in Metropolitan Adelaide, South Australia and is well versed in aviation policy through its dealings with Parafield Airport, a significant general aviation and flight training airport under the management of Adelaide Airport Ltd, and the RAAF Base Edinburgh. These have required Council to consider a number of master plans and ANEF contours revisions over the years, and relevant aviation policy changes through the State and Federal Government agencies, the most recent being on the Aviation Green Paper – Towards 2050.

The City of Salisbury has generally supported aviation and planning reforms in order to have an improved outcome for the community. This has been achieved through the adoption of various planning policies and NASAF Guidelines, including the Public Safety Zones in its policy deliberations as opportunities arose. It supports the initiatives to better explain aircraft noise through the alternative mapping process.

Comments for the Inquiry are as follows:

1. Council understands the complexity of the airport operations and breadth of impacts of how aircraft noise is measured, controlled and explained to the public. Council therefore supports any initiative to improve the framework for these matters, but it must be recognised that there are multiple stakeholders affected by airport operations, and that the response must be based on multiple responsibilities.
2. The impact of aviation policies particularly through the application of the NASAF Guidelines is significant on our Council area which is a middle ring council and pre-dominantly urban. The airports create significant constraints on land owners and limits growth. Given the current housing crisis this is particularly concerning because much of the land is ideally located near services for increased density. It must be recognised that when setting increased aviation controls around airports, this Council and its community is especially impacted.

3. There is a lack of clear and concise information for the public especially land owners about the offsite impacts and controls from airports. Information can also differ depending on the source of information. It is considered that a single source of information and relevant agency control extent should be explored for the public awareness and accessibility. This should include guide sheets and explanations. Given the significance of the issue there should be investment in GIS systems and visualisation technologies that can better inform the public.
4. It is acknowledged that the noise metrics are complex and that only airports and their associated agencies can measure level of noise. It is a concern that there is no ability (given cost constraints) for stakeholders including councils to undertake an independent measurement.

As such, there is limited ability for the City of Salisbury to comment to the Inquiry on the technical promulgation of the noise metrics. The City of Salisbury submission is generally based on the various positions previously put forward as a result of public dissatisfaction made known to the Elected Members and the media, and the Council considerations of the legislative frameworks and Master Plans.

5. The revised Masterplan for Parafield Airport is proposing new ANEF contours based on the required 20-year forecast using a different model. The community bears the cost for this:
  - a. Some land owners have previously had to pay for noise attenuation in their development and now the requirement is not necessary.
  - b. Others have purchased properties that didn't have the requirement and now do have the extra costs imposed on them.
  - c. It is Local Government that has to work with this issue with the community.

The legislation framework must change to require airport master plans to reflect the Ultimate Capacity Noise Exposure capability. Should this not be accepted, it at least must be discussed in a public document as to the reasons why it is not suitable, and how the changing alignment of the ANEF is an acceptable outcome for the community.

6. The legislation framework has shifted over the last 10 – 15 years in such a manner that the airports operations are now to be protected. This is understood in the name of aviation safety, but a recent dealing with a proposed Master Plan for Parafield Airport has resulted in the language and intent of a shared responsibility being more overtly changed so that all outside airport matters must have regard to airport operations, and no recognition that internal airport operations have an external impact. The framework must be reinforced so that airports must recognise areas and impacts external of the airports.
7. Parafield Airport is a flight training airport that has 90% of its movements attributed to circuit training. A voluntary Fly Friendly (FF) program has been introduced that has been adapted with the agreement of the Airport Operator to respect ANZAC day and RSL events. The circuit training however continues to be a source of friction, and Council considers that the FF program be extended to a curfew control with stronger restrictions on flight training hours. Circuit training ceiling heights and Sunday training time slots should be included in the controls, along with alternative track options to spread the flight circuits and their noise impacts on the community. There must be a legislative trigger in the Master Plans that sets a maximum usage of flight training movements at an airport, and if it is exceeded, an alternative is provided to stop the overflights of the community, such as relocation of the flight training schools.

8. The ANEF contours that underpins the noise framework and building standards are based on a major socio-acoustic study that assessed the impacts of aircraft noise on residential communities in Australia. This was completed in 1979. The parameters and considerations have changed significantly since the last study was done and it is recommended that an up to date study should be undertaken. Communities now live denser than in 1979 and the impact of noise is likely to have differed.
9. The most recent Parafield Airport Preliminary Master Plan has presented a number of aspects on land use developments, economic growth, traffic changes and aircraft noise metrics. There were no supporting reports or documentation of the economic modelling, the transport impacts and modelling and justification for its additional works, the changes to flight circuits or the ANEF mapping. It is considered that the proposed Master Plan did not meet the relevant provisions of the *Airports Act 1996*. It is considered inappropriate to present to the public such a proposal that has no ability for the public and Council to interrogate the assumptions, studies, and proposed outcomes. This must be changed in the legislation so that the public has an appropriate input.
10. The engagement process for Master Plan is not adequate and does not meet current expectations of the community and the Councils. Adequate engagement is only genuine, when the information can be understood by those being consulted. Engagement processes need to explain the changes clearly and justify the reasons for change. In addition, there should be a response document that outlines how issues raised during consultation were considered and any changes as a result.

The release of each Draft Master Plan must be drafted in such a manner that provides clear and concise information used to justify the Master Plan aspects that impact on the community. This includes when there are changes to circuit flight paths from the previous Master Plan. Comparison diagrams with location references and dimensions, aligned in directions and mapping must be provided. By not doing so, it makes comparisons resource intensive and impossible for the public to understand.

Council's experience with the last Masterplan process was:

- The Exposure Draft remained confidential and did not provide ANEF contours for review.
- The CEO and Mayor meeting on the revised ANEF contours were a 'sighting' only and there was no ability to interrogate what was presented. However, it is understood that the ANEF mapping has been endorsed by Airservices Australia, based on the '*...proponent has demonstrated it has paid due regard to all issues raised by State and Local Government Authorities in relation to the ANEF...*' (Endorsement of Australian Noise Exposure Forecasts, Minister for Infrastructure and Transport 18<sup>th</sup> April 2017). Council did not get an opportunity to review.

The City of Salisbury considers the above comments are important aspects that must be considered by the Committee.

The City of Salisbury wishes the Committee well in its endeavours and consideration.

Yours faithfully

  
Chief Executive Officer