

18 January 2010

Our Ref: Submission_180110_RB

Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100, Parliament House
CANBERRA ACT 2600

Dear Sir / Madam

Re: Inquiry into the effectiveness of Airservices Australia's management of aircraft noise: Submission

This letter forms a submission to the above inquiry, and represents my personal views with regard to the terms of reference.

My Experience

I have been involved with aircraft noise issues in Australia for over 30 years, and was a joint author of the National Acoustic Laboratories study "Aircraft Noise in Australia: A Survey of Community Reaction", published in 1982, which formed the scientific basis for the ANEF system of land use planning. I have since acted in a consulting role in numerous projects in relation to aircraft noise. I was responsible for preparing noise assessments for:

- Second Sydney Airport EIS (Badgerys Creek);
- Brisbane Airport New Parallel Runway EIS;
- Gold Coast Airport runway extension; and
- trial of the Precision Runway Monitor for runway 16 approaches at Sydney Airport,

among other major projects.

I have been responsible for producing ANEF charts for a number of airports, including the most recent ANEFs for both Sydney and Brisbane airports.

I have provided expert evidence at hearings relating to land use planning around airports, at airports including Perth, Sydney, Brisbane and Christchurch.

I am engaged as a consultant to the Village Building Company in relation to their dispute over land use planning around Canberra Airport. The comments presented here represent my own views, and do not necessarily represent those of the Village Building Company, any airport operator, or any other of my other clients.

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Scope of These Comments

My comments are largely directed toward the question of land use planning around airports, which is perhaps the most controversial method of *“protect(ing) the environment from the effects associated with the operation of aircraft”*. Airservices Australia currently plays a pivotal role in this process through its endorsement of ANEF charts.

Airservices also has other noise-related functions, and I will discuss these briefly before discussing land use planning.

Functions Not Directly Related to Land Use Planning

Apart from endorsing ANEF charts, other noise-related functions of Airservices Australia include approval of aircraft operating procedures such as standard flight tracks and noise abatement procedures. In my experience any such new procedures are generally initiated by the Airport (usually after consultation through the relevant community consultative committee) and are approved or not by Airservices on the basis of safety considerations. In this way Airservices effectively assumes that whether or not a procedure would benefit the community is best determined by the Airport in consultation with the local community.

Potential alterations to this *de facto* system would include expanding the role of Airservices to interact more directly with local communities. This would allow communities to bypass the Airport if they believe it is being obstructive in not proposing potential noise abatement measures. However, in practice my experience is that Airports are more than willing to propose any practical measures that they believe may improve noise outcomes. They also generally engage constructively with their communities and seek to keep them happy – although, of course, keeping everyone happy is famously impossible. Where there are disputes between community groups, the Airservices document *“Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise”* provides valuable advice on the measures most likely to minimise noise impact.

In short, I believe issues related to operations at an airport are best resolved at a local level. An expanded consultative role for Airservices (as appears to be put forward in a number of the considerations for the Inquiry) would probably be counter-productive in that it would:

- a) increase the potential for conflict without increasing the chance of resolution; and
- b) encourage an approach based on rules and precedents that must be followed throughout Australia, rather than local solutions.

Functions Related to Land Use Planning

Land Use Planning Around Airports

In contrast to operational procedures, I believe it is essential that land use planning policy be based on firm principles that are consistent at all airports throughout Australia. Here there are often powerful political interests involved, both in support of and in resistance to development. The potential for these interests to distort the decision-making process for their own benefit is significant. In addition, the interests of the Airport may well be contrary to those of the community (including future residents).

I believe in this situation it is important that a national body – either Airservices Australia or potentially the Department of Transport – be responsible for providing clear and consistent advice to local planning authorities on the suitability of a building site for new development.

Currently, this advice is provided through ANEF charts, which show projected future noise exposure around airports. Australian Standard 2021 can be used in conjunction with these charts to define areas that are “acceptable”, “conditionally acceptable” and “unacceptable” for new development. The recommendations of this Standard are taken up in all relevant planning instruments produced by local government authorities around airports, effectively creating an Australia-wide system.

There has been discussion as to whether the recommendations of AS 2021 require revision in the light of current community expectations. I have not seen evidence to convince me that this is the case, but if such revision is to be considered I believe it should be undertaken by an independent group of experts in aircraft noise assessment, such as the Standards Committee producing AS 2021. Most importantly, I believe it is essential that the concept of consistent guidelines, applicable to all airports, be retained.

Airservices Australia's Role

Currently, Airservices Australia plays the crucial role of endorsing ANEF charts for all airports in Australia. The procedure for producing these charts is as follows.

- An Airport produces a draft ANEF chart (also known as an ANEC chart), which represents noise exposure around the airport at a future time (decided by the Airport, but at least 5 years into the future) and under certain projected future operating conditions (also decided by the Airport). These charts must be produced as part of the Airport's Master Plan (updated every 5 years), but may be updated more often, at the discretion of the Airport.
- This chart will be endorsed by Airservices Australia for what is described as “technical accuracy”. In my experience this involves very detailed examination of assumptions related to such things as the location of flight tracks, allocation of operations to tracks and co-ordinates of runways – an examination which is very important and appropriate. However there is minimal checking of issues such as whether future traffic projections are appropriate, or even feasible. While there is a check that the number of movements on a runway does not exceed the capacity of the runway, this has been interpreted very strictly, allowing models to include operational scenarios that would never occur in practice. There is also, as far as I am aware, no check as to whether assumptions made by one airport are consistent with those made by others.

Before endorsement there is also a process of consultation with relevant stakeholders. This is generally undertaken by the airport, and evidence of such consultation must be provided by the airport when submitting a draft ANEF chart. However, this consultation is fundamentally informative, and it is not clear on what grounds a stakeholder could object to the proposed ANEF, other than mistakes in the calculation procedures.

- At the point of endorsement it is generally considered that the draft ANEF has become the official ANEF for the airport, for the purpose of land use planning. However, for ANEFs associated with a Master Plan, the Master Plan must then be released for public comment (**after** endorsement of the ANEF) and accepted by the Minister for Transport (presumably on advice from the Department). The Minister may reject a Master Plan on a number of grounds (for example, inappropriate projections of future traffic), and in this case the status of the ANEF appears to me to be questionable.

This is an area where I believe the status of the endorsed ANEF should be clarified. Either Airservices' endorsement should include high-level consideration of the Airport's traffic projections, or this should be undertaken by the Department and the draft ANEF should not be considered to be in force until the Master Plan is accepted and signed by the Minister. In practice I believe the second option would be easier to implement.

- For an ANEF that is not produced as part of a Master Plan, the situation appears to me to be even less clear. The Airports Act, subsection 78(2) indicates that if a new ANEF is endorsed, then the Airport must give to the Minister "a draft master plan that is expressed to replace the original plan". Given the wording in other parts of the Act, the words "draft master plan", rather than "preliminary draft master plan", imply to me that no public consultation is required when presenting this revised master plan to the Minister. If my interpretation is correct, this allows for an ANEF to become official land use planning policy with minimal opportunity for input by interests other than the Airport.

While the above comments may appear to be mere technicalities, in practice the current system for approval of ANEF charts allows significant scope for an Airport to adjust its ANEF contours either in or out, to suit its own perceived interests. In this way the fundamental purpose of the ANEF system, which is to protect the community from unacceptably high levels of aircraft noise, can be subverted.

Some Airports argue that they need to "adjust" the ANEF system, or invent a completely new land use planning system, to protect their operations from residents who may call for changes such as a curfew or "noise sharing". In response - first, I know of no evidence that such changes are required – airport operations in Australia are not becoming more constrained in this way, and the constraints that exist are at airports with residential development in areas where it would not be allowed under the ANEF system. Second, if additional protection is required this can be provided under normal planning processes, which involve weighing the advantages and disadvantages of development in various areas.

I strongly support the fundamental ANEF system for determining land use planning around airports with respect to aircraft noise. Alternatives involving greater "flexibility" appear to me to be a recipe for politically and financially motivated interference in the planning process, and I believe the ultimate outcome would (despite the tenor of current disputes) be lower levels of protection for residents. However, I believe the current system does require some adjustment, designed to reduce rather than increase its "flexibility".

Suggested Alternative Procedures

In the light of the above, I believe the following alterations to the current procedures for endorsement of an ANEF chart as a planning document would provide a better system.

- A. Some parameters which form the input to aircraft noise forecasts should be laid down in guidelines or standards provided by either Airservices Australia or (preferably) the Department of Transport, rather than selected by the Airport. These include:
 - The Airport layout(s) to be modelled – in particular whether future runways should be included – and any other alternative operating scenarios to be included.
 - The time frame for the forecasts. For most large airports this should be the time at which the airport reaches "ultimate capacity", defined as the highest number of movements consistent with efficient operation of the modelled runway system with minimal delay.

- The future role of the Airport. This would include for example the ratio of international, domestic, general aviation and freight movements expected at the Airport. It could be argued that an Airport should be free to choose its future role rather than have this dictated by the Department. However, in response, if adopting an alternative role to that preferred by the Department results in negative consequences for planning around the airport, it should be the Airport's responsibility to mitigate these through the normal planning process or, if necessary, purchasing land.
- The likely future mix of aircraft in Australia. This mix should use aircraft with conservatively high noise emission. The existing aircraft used as models for future aircraft should be defined. (Currently, different ANEFs make different assumptions in this regard.)

These parameters should be laid down before an Airport prepares any detailed ANEF modelling, and consistency with these requirements should be checked as a part of Airservices' endorsement. This would remove a great deal of the current variability in assumptions.

- B. The "consultation" requirement currently attaching to the submission of an ANEF for endorsement by Airservices should be removed, making it clear that the endorsed document represents simply the outcome of the assumptions that have gone into its modelling.
- C. After endorsement, the ANEF should still be regarded as a draft, until a process of open public consultation has been completed and the associated Master Plan has been signed by the Minister. To assist in this consultation process, a document should be publicly available describing in detail the assumptions underlying the ANEF calculations, and how they are reflected in the final contours.
- D. An ANEF produced at a time other than the five-year master planning period should be accompanied by a revised Master Plan, and the ANEF should be subject to the same provisions for endorsement, public consultation and Ministerial approval as one accompanying a standard Master Plan.

I trust that these comments are helpful. I would be happy to provide further comment or explanation if this would be of assistance.

Yours faithfully

WILKINSON MURRAY (SYDNEY) PTY LIMITED



Robert Bullen
Director