

The General Manager
Aviation Environment
Aviation and Airports
GPO Box 594
Canberra ACT 2601

Email: brisbanecurfewreview@infrastructure.gov.au

31 October 2013

UDIA Response to the Department of Infrastructure and Transport's Discussion Paper *Future Brisbane Airport Operations*

This letter provides the Urban Development Institute of Australia's (UDIA) response to the Department of Infrastructure and Transport's discussion paper *Future Brisbane Airport Operations - A Review of the Need for a Curfew at Brisbane Airport*.

The discussion paper makes reference to the National Airports Safeguarding Framework, which outlines alternative aircraft noise metrics to those included in the existing Australian Noise Exposure Forecast (ANEF) system, such as the N60, N65 and N70 noise contours. Further, the paper states that planning systems that rely solely on the ANEF system are unlikely to effectively assess the potential impact of night-time noise.

UDIA continues to have serious concerns with the conclusions arrived at by the National Airports Safeguarding Framework regarding supplementary noise metrics to the existing ANEF system, and believes that the use of supplementary noise metrics will lead to uncertain and inconsistent processes informing land use planning around airports. Additionally, UDIA strongly disagrees with the assertion that the existing ANEF system is likely to be ineffective at assessing the impact of night-time noise, particularly in light of the current review of the ANEF system and the Australian Standard governing it.

The current ANEF system has existed for over 30 years, and continues to provide developers, land owners, planning officials and airports with clear, consistent and predictable planning outcomes. The noise contours used in the ANEF system are based on research originally undertaken by Australia's National Acoustic Laboratories to establish acceptable levels of noise disturbance, and are a highly scientific and sound methodology. In contrast, the proposed noise metrics are subjectively defined and not based on any technical analysis.

The introduction of the noise metrics proposed by the National Airports Safeguarding Framework is likely to add complexity, further delays, and greater subjectivity to the planning system. They also have the potential to sterilise land from development and reduce overall development activity, putting pressure on housing affordability and further exacerbating existing housing supply problems within the Brisbane City Council area.

Consideration should also be given to homeowners living outside existing ANEF contours, but within the boundaries of the proposed supplementary metrics. These homeowners would be likely to experience devaluation of their properties due their new status as being located within a relevant aircraft noise contour.

Australian Standard AS2021, which defines the ANEF system is currently being reviewed by Standards Australia, and specifically excluded the inclusion of supplementary noise metrics from the scope of the review, because of strong stakeholder concerns around the additional planning uncertainty they would create.

UDIA strongly maintains the view that AS2021 and the existing ANEF system has been very effective in delivering certainty and consistency in land use planning around airports across all Australian jurisdictions, including in the vicinity of Brisbane airport. The introduction of new noise metrics to inform land use planning around Brisbane airport is both unnecessary given the adequacy of the existing ANEF system, and will create additional complexity, delays and uncertainty in planning decisions.

We would welcome the opportunity to discuss any aspect of this submission in greater detail. For further information, please contact Liam Foley at UDIA National on 02 6230 0255 or at lfoley@udia.com.au

Yours sincerely,



JULIE KATZ

National President