

8 May 2009

Ms Kathy Aves  
Canberra Airport  
2 Brindabella Circuit  
Brindabella Business Park ACT 2609

Email: [info@canberraairport.com.au](mailto:info@canberraairport.com.au)

Dear Ms Aves



13 MAY 2009

## Re: 2009 Canberra Airport Preliminary Draft Master Plan

The Urban Taskforce is a non-profit organisation representing Australia's most prominent property developers and equity financiers. We provide a forum for people involved in the development and planning of the urban environment to engage in constructive dialogue with both government and the community.

The Urban Taskforce has made several detailed submissions to government on planning reform and land use planning in the vicinity of major airports. Our greatest concern relates to the inappropriate use of the airport master planning process and Australian Noise Exposure Forecast (ANEF) mapping to artificially restrict development. We have completed a review of the *2009 Canberra Airport Preliminary Draft Master Plan* ("the plan") and provide the following comments for your consideration.

### 1. The plan must recognise future urban development in the vicinity of Canberra Airport

It is obvious, but worth stating that we need airports. Aviation and airports are vitally important entry points and essential for business and tourism growth. Investment in airport and supporting infrastructure is significant and we should ensure that the opportunity that this provides is maximised. The presence of an airport and the additional infrastructure that it attracts must be seen as an advantage and valued.

Planning must not lose sight of the fact that airports are a necessity and their existence is essential for regional and international commerce. However, the need for airports and their ability to expand must not be at the expense of appropriate land development for urban purposes. Airport growth must be managed within a local planning context. There is no evidence that the plan has properly considered local planning in its development. In fact, it is apparent that the plan focuses on airport expansion and operating requirements without giving due regard to the *2031 Queanbeyan Residential and Economic Strategy*. The plan makes reference to the *Queanbeyan Structure Plan 1974* and *1994*, which have been superseded by the *2031 Queanbeyan Residential and Economic Strategy*.

**The plan does not respect the recognised planning context in the vicinity of Canberra Airport or that the planning context provides for significant residential development.** The NSW Department of Planning has set aside land in the South Jerrabomberra area to accommodate significant residential development. This land has been identified as being suitable for urban development while having regard to the accepted ANEF. It is therefore not appropriate for the plan to suggest that urban development in this location should be severely restricted and/or limited to rural residential development.

The plan does not properly consider the broader planning context for the region. That is, future development for the region has been outlined in the *Sydney to Canberra Corridor Regional Strategy*, which was prepared in consultation with the ACT Government. This strategy has been

adopted by the NSW Government as planning policy for the region and must be considered when preparing a master plan for Canberra Airport.

Furthermore, the plan should not suggest alternative locations for residential development, particularly those that have already been examined and rejected by the NSW Department of Planning and Queanbeyan City Council.

**2. The ANEF system provides certainty, there is no other recognised planning system**

Aircraft noise must be properly considered and appropriate planning must be undertaken to permit development that is suited to local environmental conditions. Appropriate planning does not mean that valuable land in the vicinity of airports should have their development potential restricted by the inappropriate use of the ANEF. The assumptions made when generating noise contours must be realistic and justifiable.

Notwithstanding the above, the ANEF system can be an effective planning tool when considering land use in the vicinity of airports. If we are able to look beyond the questionable assumptions upon which the ANEF is generated, the ANEF system does provide clarity and certainty for the land use planner, building designer and investor.

The planner is able to refer to clearly marked plans and assign appropriate land uses based on noise exposure forecasts. The building designer can refer to the same plans and with the use of Australian Standards design buildings that meet stringent acoustic criteria. An investor may use the ANEF system to consider the restrictions that will be placed on land use in the vicinity of an airport and/or the need for specialised building elements to meet standards. With this clear knowledge the decision to invest and the return on investment can be determined.

The plan must only refer to the recognised ANEF system and appropriate Australian Standards when considering urban development in the vicinity of the airport. The NSW Government has a long-standing policy on this matter and this is clearly set out by the local planning directions issued pursuant to section 117 of the Environmental Planning and Assessment Act. There is no reference to any other planning system outside of the ANEF system and Australian Standard 2021.

The Urban Taskforce objects to the suggestion that a "high noise corridor" be introduced as a planning tool. The high noise corridor concept that has been created by Canberra Airport, is not in common use elsewhere in Australia and is not supported by robust scientific and socioeconomic research.

**Currently there is no recognised alternative to the ANEF planning system. Therefore it is not appropriate for the plan to seek the introduction of a "high noise corridor" as a planning tool and should not be used to consider and/or seek a restriction of land use in the vicinity of the Canberra Airport.**

These comments are offered to encourage constructive dialogue and we ask that you carefully consider the contents of this correspondence and make amendments to the *2009 Canberra Airport Preliminary Draft Master Plan* as appropriate.

Yours sincerely

**Urban Taskforce Australia**



Aaron Gadiel  
Chief Executive Officer