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SUBMISSION ON REVISED PROPOSAL TO REVIEW AS2021 – 2000

This submission summarises the position of Urban Taskforce Australia on the proposal by the Australian Government Department of Infrastructure and Transport to review AS2021.

We should begin by saying that we were strongly against the previous proposal to review the standard as it was leading to the replacement of a tried and accepted process for determining where land close to airports became undesirable for housing. The use of the ANEF system has given consistency to land use planning around airports that we think should not change as this will open significant community concerns about the value of land.

The Urban Taskforce accepts that a review of the standard is due after 13 years but we believe this should only lead to minor changes. Our concern with the proposal document is that it seems to have been written from a protection of airport perspective with little information on the significant problems that could flow to land use planning from a change to the present system. The text implies that communities are looking for information on airport noise systems but makes no mention of the possible confusion that would flow from communities being presented with different measures in terms of the impact on their land values.

I will make comments on the various sections of the proposal:

1. Proposal Details

Point 1 seems to suggest a new appendix related to land use but this is also covered in the creation of a new document. Our preference is for anything that confuses the clarity of the ANEF system to be in a new document and not in an appendix to AS 2021. We also believe that there needs to be more independence in assessing the future capacity and use of an airport as it is this data that determines where housing can be built. Currently it would appear that an airport could dramatically increase its future projections well above reality and this would remove land for housing development.

The section on creating a new document focuses mainly on the impact of noise but has little on planning for future housing. It needs to understand both issues.

I agree that EV-011 be reformed and essential that land use planning skills and economic development skills be represented on the Technical Committee.

In the section on Relationship to Legislation it is clear that it is mainly planning legislation that is involved and this reinforces the need for experts in this field to be on the committee.

2. Summary and Demonstration of Net Benefit

The need for the proposed work is partly about community perceptions and supposed concerns with ANEF. There is no statement of the importance of the standard in determining where housing can be constructed and the concerns communities and residents would have if current rules change and affect house values. The statements that noise does not stop at a line, at say the ANEF 20, is not balanced by a statement that a specific line is needed for land use planning.

The statements about the use of alternative metrics to help land use planners determine where land is acceptable implies the applicant is looking to create more confusion in the community by having a number of lines that can determine where housing is acceptable.

The comments about different metrics at regional airports do not seem to reflect our understanding of how the ANEF system operates.

A net benefit that should be stressed more is the need for consistency to give a fair playing field for all in land use planning.

The statement that a review of AS2021 is likely to be received positively by the community will not be correct if it tells many in the community that they now live in unacceptable locations.

The section on Economic Impact only talks about the benefits of more information but not the negative impacts on those owning land that could move from being acceptable for housing to being unacceptable for housing. I have been rung recently by people in the Queanbeyan area on exactly this issue.

3. Harmonisation and Alignment

No comment.

4. Pathway for Standards Development

Agreed that a new committee is required with land use planning expertise and property industry expertise on the impact on the market place.

5. Stakeholder Support

I believe there is stakeholder support for a review and for the development of a separate information document that explained airport noise issues. This document however should not impact on land use planning.

6. Risks and Dependencies

The major risk is that the review led to a destabilising of the land value and use around airports as varying planners used a variety of noise measurement tools to create a planning confusion. The property and development industry representatives have been concerned at a process that seems to devalue their position in discussions to date. This has led to a lessening in confidence in the motivation of the Australian Government in driving change that could have a dramatic impact on land values and housing supply.

7. Additional Information

The Urban Taskforce would be keen to be involved in the process of reviewing AS2021 to ensure balanced outcomes for the overall Net Benefit to the Australian community.

Summary:

The Urban Taskforce supports a review of AS2021 but is concerned about the issues raised above and believes these needs to be clarified in the brief to the Technical Committee.

Should you require any further clarification of the content of this correspondence, please feel free to contact me on telephone number 9238 3927.

Yours sincerely

Urban Taskforce Australia



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