

18 December 2015

Department of Infrastructure and Regional Development
Western Sydney Airport Submission
Western Sydney Unit
GPO Box 594
Canberra ACT 2601

Sent by email: WSAsubmission@infrastructure.gov.au

Re: Western Sydney Airport Draft Environmental Impact Statement 2015

The Property Council of Australia welcomes the opportunity to provide input on the Western Sydney Airport Draft Environmental Impact Statement 2015 (EIS).

The draft EIS is a study of the environmental, social and economic impact the proposed Western Sydney Airport would have on the airport site and the surrounding area for what is a most critical piece of infrastructure.

The Draft Environmental Impact Statement recognizes the Australian Noise Exposure Forecast (ANEF) system for measurement of airport noise which is defined by AS2021 – 2015 (Acoustics – Aircraft Noise Intrusion – building siting and construction) to advise on the acceptability of building sites based on ANEF zones.

The Property Council supports the use of AS2021 and has been an active participant in the EV-011 Aircraft Noise committee.

The ANEF is based on the international NEF system, which is used throughout the world as the basis for land use planning decisions near airports. It has recently underwent a review and was again determined to be the land use planning tool for assessing aircraft overflight noise.

It has successfully guided land use planning decisions in Australia for over 30 years and has been widely adopted by the Commonwealth, State and over 600 local governments in all relevant legislation and planning policies.

ANEF has been accepted and widely utilised by the jurisdictions precisely because it provides this guidance. In the case of the development industry, it offers both certainty and clarity in the decision-making process.

This is because there is one clearly defined Australian Standard which has been adopted nationally. The standard provides the added benefit of having been developed with a thorough consideration of technical issues, and it is grounded in scientific fact.

National Airport Safeguarding Framework (NASF)

The Environmental Impact Statement makes reference to NASF in detail across the volumes. Particularly of issue, NASF is called up in detail on page 435 of volume 2 and incorrectly referred to as the land use planning framework agreed to by Commonwealth, State and Territory Ministers in 2012. States have written to the Department to correct this statement and there should be no such further representation of national support.

In a broader context, the Property Council does not support the NASF Guideline A, the development of which was based on an assumption that there was a policy gap in relation to land use planning in the vicinity of airports. It is the Property Council's position that the AS2021 is adequate and an effective guide for land use planners in State jurisdictions

Sections 35.4.1.2 and 35.5.2.2 and many other sections of the EIS could restrict residential development around the Western Sydney Airport if taken up in accordance with the National Airport Safeguarding Framework (NASF)

The Department of Infrastructure and Regional Development has indicated the potential impact of Guideline A which prohibits residential development where long range noise modelling for the airport indicates either:

- a) 20 or more daily events greater than 70 dB(A);
- b) 50 or more daily events of greater than 65 dB(A); or
- c) 100 events or more daily events of greater than 60 dB(A).
- d) more than 6 events between the hours of 11pm to 6am which create a 60 dB(A) or greater noise impact

Under AS 2021, residential development is currently prohibited inside the inner solid black contour on each map in the EIS. Under Guideline A residential development would be prohibited inside any contour on these maps. It would also be prohibited inside the N60=6 night-time contour which generally extends further beyond the contours in these maps.

The impact of NASF at Badgerys Creek is much more significant than the impact of AS2021. Guideline A of NASF would prohibit residential development to outside the N60=6 contour which is very close to the light blue coloured area indicated on Figures 31-34 and 31-35. This would prevent development in many areas currently identified for residential development including Marsden Park, Austral and immediately to the south of Penrith.

Noise Management Plan

Further detail is requested in relation to the development of the Noise Management Plan as outlined on page 72 of volume two.

The Noise Management Plan proposes to form a new body to include the airport lessee company, Airservices Australia and the Civil Aviation Safety Authority, Department of Infrastructure and Regional Development, State and Local Government, the airline industry and community representatives.

This new national body would address issues in the plan which include land use planning policies and instruments for areas surrounding the airport taking account of predicted noise exposure levels. This body would potentially be taking a greater role in land use planning from the state through the roles outlined here.

The EIS should be amended to delete any reference to Guideline A of NASF and the establishment of a planning body other than State and local governments.

If you have any questions regarding this submission, please do not hesitate to contact property Council on (02) 9033 1900.

Yours sincerely



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