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10 May 2013

Proposed Planning Policy – Canberra Airport
Department of Planning & Infrastructure
PO Box 5475
WOLLONONG NSW 2520

Dear Mr Whitworth

Draft Ministerial Direction – Canberra Airport

On behalf of the Housing Industry Association (HIA) I would like to provide the following comments in respect to the draft Section 117 Ministerial Direction for development near Canberra Airport.

HIA represents over 40,000 businesses nationally who are involved in all facets of the residential building industry. Whilst the proposal relates to development in NSW, and is further limited to the surrounds of Canberra Airport, HIA is concerned with the potential precedent that may arise for other airports in NSW and potentially in other jurisdictions.

HIA is involved in the ongoing discussions regarding the noise metrics used in Australian Standard 2021 – *Acoustics – Aircraft noise intrusion – Building siting and construction*, arising from the National Airport Safeguarding Framework. The NSW Government is party to these discussions and recently attended a forum about potential amendments to AS 2021. It is unclear why the NSW Government did not put forward concerns about the use of Australian Noise Exposure Forecast (ANEF) 25 as the boundary for development around airports, rather than ANEF 20, as part of that process. Similarly, such an amendment has not been put forward by the Federal Department of Infrastructure and Transport, who is leading the review process.

On this basis, it is unclear why the NSW Government is seeking to step outside the current requirements of AS 2021 for land around only one airport in its jurisdiction.

Whilst it is recognised that the principles of the Direction have recently been applied to land rezoned within the vicinity of the airport, it is not considered that this justifies a wholesale application of the ANEF 20 metric to all land surrounding Canberra airport.

It is suggested that an alternative response to support the orderly future development of areas within the vicinity of Canberra airport that are subject to ANEF 20 would be to retain the current AS 2021 construction requirements and to use the Ministerial Direction to notify land owners (present and future) about the potential noise impacts from aircraft movement within the ANEF 20.

It is also a concern that the draft Direction was only provided for public comment over a 3 week period. This has given little time to engage with property owners and residential developers and builders in this area who will be significantly affected by the proposal. Should further information be developed on the Direction, HIA would appreciate being consulted to allow more comprehensive input to be provided.

I would be pleased to meet with you to discuss these comments and I can be contacted on 02 6245 1314 or k.brookfield@hia.com.au.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

A handwritten signature in black ink, appearing to read 'Kristin Brookfield', written in a cursive style.

Kristin Brookfield
Senior Executive Director
Building Development & Environment