



**MASTER BUILDERS  
AUSTRALIA**

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Department of Infrastructure and  
Regional Development  
Western Sydney Airport Submission  
Western Sydney Unit  
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Master Builders Australia welcomes the opportunity to make a submission on the Western Sydney Airport Draft Environmental Impact Statement 2015 (the EIS).

Master Builders Australia represents the interests of over 32,000 members nationally who operate across the whole of the building and construction industry. Master Builder' interests in aircraft noise goes beyond Badgery's Creek airport because of its policy implications elsewhere in Australia.

Master Builders has had a long term involvement in the national policy debate on the issue of residential land use planning in areas potentially affected by aircraft noise and in this case including Badgery's Creek.

We have expressed our concerns on the issues raised by the National Airport Safeguarding Advisory Group (NASAG), participated in discussions on the Commonwealth proposal to review Australian Standard AS2021-2000, and membership of the committee EV-001 of Standards Australia which reviewed AS2021 culminating in the recent publication of AS2021-2015.

As you would be aware AS2021 was published in 1975, first as a guide to the treatment of buildings affected by aircraft noise. In 1977 it was expanded to incorporate land use planning based on the American NEF system, although rather more conservative than the American system in identifying areas "acceptable" for residential development.

In 1982 the Australian National Acoustic Laboratory published its scientific study on reaction to aircraft noise.

It was this scientific research which led to the introduction of the Australian Noise Exposure Forecast to replace the American NEF. AS2021 was further reviewed in 1992 and 2000, and now again in 2015.



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The basic recommendations of AS2021 are currently adopted by every relevant land use planning body in Australia.

As you would also be aware, in December 2009 the Commonwealth Government released the Aviation White Paper which included a recommendation for the establishment of a national land use policy.

The White Paper, in our view, ignored the fact that such a policy in the form of AS2021 had been in existence since 1977 and had well served the interests of the community and the operation of airports.

Notwithstanding this reality, the Commonwealth established the NASAG and proceeded to develop an alternative planning system. This was Guideline A of the National Airport Safeguarding Framework, (NASF) based on the new noise metrics. These new metrics of noise frequency based contours lacked any scientific basis.

Master Builders responded in part to the consultation on NASF in the following manner:

*'Master Builders welcomes the opportunity to comment on the draft Framework.*

*The Draft Framework in its "principles" states axiomatically that airports take precedence over all other land uses. Master Builders contends however, there has been no cost/benefit analysis to justify these principles which would ordinarily be required in developing a framework with such far reaching social and economic implications.*

*There is insufficient information, by way of data or studies provided in the Draft Framework for a reader to understand the use of the Supplementary Noise Metrics in conjunction with the ANEF on development around airports.*

*The controls proposed in the Draft Framework for new residential development are not compatible with those set out in the Australian Standard. Whilst the Australian Standard does suggest that in appropriate cases supplementary measures may provide additional information the Australian Standard (and the ANEF system) alone determine land use acceptability'.*

The then Minister for Planning and Infrastructure in NSW shared our views. In his letter to Master Builders dated 15 May 2013 he said that the Department of Infrastructure and Transport had been advised that NSW did not support the use of alternate noise metrics to regulate land use.

In December 2013 Master Builders responded to an invitation to comment on the "Future Brisbane Airport Operations Discussion Paper" a copy of which is attached.

The submission drew attention to the "emphasis placed upon frequency based contour maps as an alternative to the contour maps produced under the AS2021 and ANEF processes which have governed land use planning since 1977".

It also referred to the rejection by the Queensland Government and Brisbane City Council of the frequency based metrics as the basis of land use planning decisions.

At the same time Master Builders wrote to the then Premier of Queensland alerting him to our concerns. That letter is also attached. It refers to our ongoing concerns about the attempts of the Commonwealth to replace AS2021 with NASF.

A casual reader of the EIS could be encouraged into believing that the long standing use of AS2021 was accepted for land use planning purposes by the authors of the EIS. However our closer examination reveals what we believe, is far from the reality. There is constant reference to, "The National Airport Safeguarding Framework (NASFG) is a national land use planning framework agreed by Commonwealth, State and Territory Ministers in 2012".

Identical words are used on several occasions throughout the document. In each case the NASF is promoted in favour of AS2021.

In Chapter 21 at page 449 the report says:

*NASF would be instrumental in managing potential future operational noise impacts for future land use planning and development around the airport.*

Further, on page 72 of Chapter 10, the EIS outlines a proposal to establish a body to control land use planning policies and instruments for areas surrounding the airport. As we understand, it proposes transferring planning powers from the State Government to a committee effectively under the control of the Commonwealth, and the airline industry.

In August 2014, the chair of NASAG Mr Andrew Wilson wrote to Master Builders in terms of the attached letter concerning the role of NASF.

Mr Wilson states that NASF has been endorsed and implemented by each state and territory. In respect of Guidelines A land use planning, MBA is advised that it has been rejected by NSW, Queensland, Western Australia and the Northern Territory.

The EIS misrepresents the status of NASF, in seeking to replace AS2021.

At Badgerys Creek there remains a role for the new noise metrics set out in NASF. This has been recognised by Standards Australia.

In February 2013, Standards Australia convened a full day forum of a comprehensive group of significant stakeholders, to consider the Commonwealth proposal to incorporate NASF in AS2021.

The Commonwealth proposal was overwhelmingly rejected. Instead it was decided to proceed to a review of AS2021 without reference to the alternative noise metrics. That review is now complete and continues to form the basis of land use planning decisions in the vicinity of airports.

In May 2015, Standards Australia published an amended version of AS2021, following a comprehensive review and consensus agreement by a committee consisting of representatives of the Commonwealth and State governments, local councils, expert consultants and aviation and development industry groups.

As well Standards Australia initiated the development of a document "for information purposes only on the impact of changes in aircraft noise exposure, the nature and extent of aircraft noise impacts and an appreciation of aircraft noise impact in designated areas 'acceptable' under AS2021". In pursuing the objectives of this document the NASF principles in Guideline A will play a constructive role.

Master Builders would argue that on the critical issue of land use planning, the draft EIS has failed to provide a sound basis for final determination and should be reviewed and exposed for further consultation.

Master Builders recommends that a further revision should include a detailed recognition of the lack of jurisdictional support for Guideline A of NASF. It should also include an account of the review of AS2021-2015 and the significance of that review for future land use planning in the vicinity of Badgerys Creek airport.

So as to remove any uncertainty, Master Builders also recommends the EIS should declare AS2021-2015 as the sole determinant of residential land use planning in the vicinity of Badgerys Creek airport.

Master Builders looks forward to meeting with you to discuss our serious concerns and our call for a review.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'W. Harnisch', with a long horizontal flourish extending to the right.

Wilhelm Harnisch  
CEO