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Nicholas Dowie
Planning Policy and Environment Section
Airports Branch
The Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

By Email: safeguarding@infrastructure.gov.au

Dear Mr Dowie

Safeguards for Airports and the Communities around them

We refer to the call for public submissions in response to the *Issues Paper: Safeguards for Airports and the Communities around them*.

As the peak industry body for residential construction, renovation and development with over 43,000 members Australia-wide, including 1,500 members in its ACT and Southern NSW region the Housing Industry Association (HIA) appreciates the opportunity to comment on aspects of the discussion paper that are relevant to residential development.

In particular, HIA is interested in the contemplation of different standards for land use planning in areas affected by aircraft noise that are contrary to widely accepted standards that have operated without any evidence of significant failure under the ANEF system.

In passing any comment HIA notes that this paper rehashes a number of the issues outlined in an earlier discussion paper titled *Towards a National Aviation Policy Statement* that HIA responded to in late October 2008.

HIA's position has not changed since then and we again express our grave concern with the potential imposition of a vastly conservative "High Noise Corridor".

In this latest discussion paper there appears to be a proposal to develop a high noise corridor that aligns with a 65 dB single event contour. If this was to occur this would have the potential to greatly

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reduce the availability of useable residential land in the vicinity of airports and render many existing residential areas around airports non-compliant.

While HIA appreciates the need to protect the public interest in ensuring that local communities are minimally affected by aircraft noise we reiterate that we are still not convinced that there is a justification for applying more conservative standards. We note that there is already an existing standard (*AS 2021 1985 – Acoustics – Airport Noise Intrusion – Building Siting and Construction*) and there is yet to be any cost benefit analysis or other evidence supporting a move away from this standard.

Ultimately, a more conservative approach to ANEFs will have the potential to heavily impact on greenfield an infill sites at a time when a ready supply of land is needed now and into the future to meet underlying demand and address housing affordability issues.

Please do not hesitate to contact me if you wish to discuss HIA's submission further.

Yours sincerely
HOUSING INDUSTRY ASSOCIATION LIMITED

A handwritten signature in cursive script that reads "Stuart Collins". The signature is written in black ink and is positioned above the typed name and title.

Stuart Collins
Executive Director
ACT/Southern NSW