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26 November 2019

General Manager
Aviation Environment
Department of Infrastructure, Transport, Cities and Regional Development
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam

RE: Review - National Airports Safeguarding Framework Implementation

I refer to your recent consultation on the review of the National Airports Safeguarding Framework.

Council has consistently for a long time supported measures to more effectively protect both the operations of the airport and the amenity of local communities. For the Sutherland Shire, Council protects airport operations through:

- statutory controls requiring referral of 'controlled activities' (light, smoke, turbulence, reflective, and such uses) to Sydney Airport Corporation Ltd, and
- statutory limitations on the height and types of development in relation to prescribed airspace (Obstacle limitation surface OLS and PANS-OPS)
- statutory Directions under the Environmental Planning and Assessment Act 1979 (Direction 3.5 Development near licensed aerodromes) – prevents inappropriate development where affected by high levels of aircraft noise (applying the Australian Noise Exposure Forecast).

For the Sutherland Shire, This means that there are some limitations on the location of tall buildings and cranes (greater than 30-50metres - dependant on the location) in Sutherland Shire. It also limits and the extent of residential development on the Kurnell Peninsula and requires noise attenuation for some forms of development.

It is noted that the National Airports Safeguarding Framework goes beyond these statutory controls – for example, applying a supplementary suite of noise metrics (N70s) that impose greater limitations on development, greater than the ANEF restrictions.

Aircraft noise has been an ongoing concern in Kurnell. Council's policy has to provide full disclosure to residents affected by aircraft noise, including those new residents at Greenhills Beach (see Council report EAP045-11).

Until the framework is enshrined in NSW State planning legislation, the National Airports Safeguarding Framework cannot be given statutory consideration. As such the National Framework has very little effect. This submission is based on Council's previous consideration of these issues.

Should you require further information please contact Beth Morris, Senior Policy Advisor on 9710 0376.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Mark Carlon', with a long horizontal line extending to the right.

Mark Carlon
Manager Strategic Planning