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Submission:

17/02/2020

Dear Sir/Madam,

I wish to submit this document in response to stage 2 of the LUIIP process for your consideration.

The major concern i have is the NSW Planning departments decision to impose a "no rezoning" within the 20 to 25 ANEC/ANEF contour area based on the full term ANEC [concept] operation of new airport. 'Using the Airports projected 'Practical Ultimate Capacity' contours, activity levels and the associated 20 ANEC contour, a more conservative approach to aircraft noise is being used than at 'existing airports'. The inference appears to imply that AS2021 [2015] applies to existing airports but precludes its use for future airports as is the case in this situation. The adoption of ANEF contours for land use planning purposes by AS2021 does imply an operational status of an airport but there are no technical reasons precluding its use on a future airport such as WSA.

Appendix B of AS2021 has a reference to future runways and ANEC contours and therefore confirms the land use planning principles of AS2021 can be used for future events reinforcing the "conditionally acceptable" status of the 20-25 ANEC/ANEF zone for residential use. I also call into question the the use of the "Full term operation projected ANEC Contours" [2063 mapping] and the extent of the 20 ANEC countour over populated areas [Silverdale/Warragamba].

The discussions i have had so far with FOWSA and the Federal agencies dealing with flight path design lead me to believe that at all costs where practical a practice of "overflights over populated areas will be avoided" will be adopted. I have pointed out the the current indicated impact over our area can be reduced dramatically by the adoption of two revised operational procedures with the opening of the second runway.

1. 2063 Mapping shows a "jet flight path" over flight over our area and can be diverted further west before turning dropping the noise dramatically.
2. Higher usage of the new southern runway [bias] to minimize noise over populated areas.

I am pursuing these points through not only FOWSA but directly with the Federal authorities as well. I hope to get any results or actions conveyed to NSW Planning to assist in the final implementation of appropriate planning for our area.

The governments imposition of this new ruling and modification/ addition of ministerial direction 5.8 appears to have been made without any scientific analysis or on any credible basis and so is premature prior the release of the final flight paths. The inclusion of the statement listed in the latest documents under section 2.9.2 Australian Noise Exposure Concept/ Australian Noise Exposure Forecast. Reads "Under the WSAP, the SEPP and the DCP, development up to the 20 ANEC contour will need to adopt appropriate design and construction standards to reduce aircraft noise impacts" has no defined explanation or boundary. This is a prime example of NSW Planning again trying to rework AS2021 [2015] without a full understanding of its previous use in creating an acceptable buffer around the airport.

The statement is ambiguous at best as no reference to further descriptors either in distance or use of further ANEC/ANEF has been used. If implemented this will be a further impost on new home building outside the any "current" affectation zone but the extent will be unknown until NSW Planning defines the situation. This is further

proof that a return to the original AS2021 understanding that has been in place for decades is required. NSW Plannings current broad brush approach of no rezoning within the 20-25 ANEC/ANEF has the potential to sterilize a large tract of what was potentially viable land. No mention has been made of any other possible re zoning considerations such as large lot residential [conditional] commercial or industrial in this newly designated 20-25 ANEC area. It seems inconceivable that landowners closer to the airport[Higher ANEC/F] can obtain re zoning but the band between 20-25 are locked out of the option to apply. Again further evidence that a return to original noise references used since the concept of a Western Sydney Airport was mooted should be acknowledged and reintroduced.

Best Regards

John Harding