



Submission to the Department of
Infrastructure and Transport Draft
Project Proposal on a Review of
Australian Standard 2021–2000:
Acoustics—Aircraft noise intrusion—
Building siting and construction

24 August 2012

ABOUT UDIA

The Urban Development Institute of Australia (UDIA) is the peak body representing the property development industry throughout Australia. Established at a state level in 1963, the Institute evolved to become a national body with a number of state-based divisions in 1970. UDIA aims to secure the economic success and future of the development industry in Australia, recognizing that national prosperity is dependent on our success in housing our communities and building and rebuilding cities for future generations.

Our members cover a wide range of specialist and industry fields, including: Developers, Valuers, Planners, Engineers, Architects, Marketers, Researchers, Project Managers, Surveyors, Landscape Architects, Community Consultants, Environmental Consultants, Lawyers, Sales and Marketing Professionals, Financial Institutions, State and Local Government Authorities, and Product Suppliers.

The property development industry is one of the major drivers of the Australian economy, directly accounting for 7.3% of Australia's GDP and employing 975,700 Australians.

INTRODUCTION

The Urban Development Institute of Australia (National) welcomes the opportunity to provide this submission to the Department of Infrastructure and Transport on its project proposal for a review of Australian Standard (AS) 2021.

While the UDIA is not opposed to review of AS 2021 or any other standard, we believe that this particular standard has been effective in delivering certain outcomes in the area of land-use planning around airports and should thus remain in its current form.

UDIA has noted that Standards Australia's proposal form explicitly requests 'stakeholder consultation' be 'conducted and their input incorporated'. Following the consultation process on the *Draft National Airports Safeguarding Framework* earlier this year, the Department will be well aware of the urban development industry's opposition to the proposed changes to the standard.

However, UDIA does not believe that the industry's viewpoint or the viewpoint of other stakeholders has been adequately expressed in the project proposal form. It is essential that Standards Australia is informed about all viewpoints on the adequacy of AS2021. Providing Standards Australia with this submission as well as all the submissions to the Draft National Airports Safeguarding Framework is important for the sake of a transparent review process.

DEMONSTRATION OF NET BENEFIT

UDIA does not believe that changing AS2021 by supplementing the Australian Noise Exposure Forecast (ANEF) will deliver overall positive benefit to the Australian community as required by Standards Australia. In fact, supplementing the ANEF with a suite of noise metrics as outlined in the Safeguarding Framework has the potential to generate uncertainty in the planning process, constrain housing supply, compound affordability and devalue existing house values.

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For over 30 years AS2021 has provided planners and developers with clear guidelines for land use planning around airports. UDIA is concerned that adopting a assortment of noise measures working in conjunction with each other will threaten the certainty which has existed under ANEF regime over the last 30 years. In fact, the language contained in the Consultation Draft indicates that a system of multiple metrics would be characterized by a lack of consistency and uncertainty.

The current system affords developers, land owners, planning officials and airports with a certain outcome, devoid of ad hoc decision making. The lack of clarity and the multiple options in the proposed system may serve to politicize the approval process, a situation which is not in the best interest of any parties involved.

There is concern among the UDIA membership that the complexity of the proposed system will lead to further delays in what is already a time consuming planning system in most jurisdictions. There is similar concern that when faced with increasing complexities, planning officials are likely to err on the side of caution by rejecting development applications.

If enacted, the proposals will definitely lead to the sterilization of land and more complex planning processes, resulting in a net reduction in development activity. States and Territories across Australia are struggling to bring sufficient amount of land to the market and any further reduction in the potential land supply pipeline will only compound matters.

Scarcity of land undoubtedly has a flow on affect for the supply of housing. One need only visit the findings of the National Housing Supply Council's 2011 State of Supply Report to conclude that Australia can ill afford further constraints to residential development. Furthermore, policy makers need be conscious of the strong correlation between the undersupply crisis and the lack of affordable housing product across the country.

Consideration should also be given to homeowners living outside the ANEF 20, but within the boundaries of the proposed supplementary metrics. Such properties will experience devaluation due their new status as being located within a relevant aircraft noise contour.

ALIGNMENT WITH NATIONAL PUBLIC POLICY

AS 2021 is currently used by all the States and Territories and is a rare case of planning uniformity in Australia. Although the Safeguarding Framework was endorsed by the Standing Council on Transport and Infrastructure (SCOTI), it has yet to get official backing from the various planning authorities.

UDIA has received correspondence (see appendix) from a number of Planning Ministers from various States and Territories in which they have outlined their opposition to Guideline A (the guideline which deals with managing aircraft noise around airports) of the Safeguarding Framework.

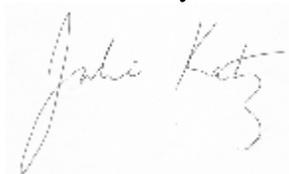
UDIA believes that as State and Territory governments realize the potential adverse affects of the changed standard, there will be an increased risk of the standard not being adopted across the board, as is currently the case. A situation in which various jurisdictions have different

guidelines for planning in the vicinity of airports is an inferior outcome to the current situation in which AS2021 functions effectively throughout the country.

CONCLUDING COMMENTS

UDIA thanks Department of Infrastructure and Transport for the opportunity to provide this submission. UDIA would welcome the opportunity to discuss any aspect of this submission in greater detail. For further information, please contact UDIA National on 02 6230 0255 or at udia@udia.com.au.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Julie Katz', is placed over a light grey rectangular background.

Julie Katz
UDIA National President

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