



Australian Government

Department of Defence

Estate and Infrastructure Group

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Port Stephens Council
PO Box 42
RAYMOND TERRACE NSW 2324

Dear Sir / Madam,

Re: Development Application Number 16-2018-774 – Eco tourism facility – 27 Stockton Bight Track, Fullerton Cove, NSW

I refer to the abovementioned Development Application (DA) which is currently subject to a planning assessment by the Port Stephens Council. The DA is for a proposed eco tourism facility comprising 44 accommodation units, a manager's residence and associated eco tourism uses at 27 Stockton Bight Track, Fullerton Cove, also referred to as allotment 227 DP 1097995 Lavis Lane Williamtown.

Defence has reviewed the development proposal and has identified planning considerations relevant to aircraft operations at RAAF Base Williamtown. The impact of aircraft noise, Public Safety Areas, building height restrictions, extraneous lighting and glare, and the threat of bird strike are all considerations applicable to this proposal and, for reasons outlined below, Defence is strongly opposed to the proposed development.

The proposed development site is located approximately three kilometres south-east of the main runway at RAAF Williamtown, in close proximity to the extended centreline of the main runway. RAAF Base Williamtown is one of Defence's busiest and most important military airfields providing critical capability for the defence of Australia. It is Air Force's intent that RAAF Base Williamtown remain the nation's main fighter pilot training base, and most of the planned F-35A Joint Strike Fighter Lightning II aircraft will be based at the airfield. RAAF Base Williamtown is the home base for the tactical fighter element of the Air Combat Group and the Airborne Early Warning and Control element of Surveillance and Reconnaissance Group. As noted in the 2016 Defence White Paper, an upgrade and expansion of the facilities at RAAF Base Williamtown will be carried out over the course of this decade.

RAAF Base Williamtown also provides a significant economic stimulus to the Hunter Region. Decisions to allow noise sensitive development to encroach upon this major Defence facility will undermine its long term viability.

Aircraft Noise

In Defence's experience, the development of noise-sensitive land uses in close proximity to airfields leads to complaints about aircraft noise. Permitting further accommodation uses in areas affected by ANEF contours worsens the outcome for the community and Air Force. Should the proposed application be approved, Defence will not be responsible for any future liabilities in relation to military aircraft noise.

The subject land is located within the 20-35 Australian Noise Exposure Forecast (ANEF) contours for RAAF Base Williamtown (ANEF2025). It is noted that the accommodation component of the proposal is located within the 25-30 noise contour; and the reception, storage and maintenance building within the 30-35 noise contour.

Whilst hotel, motel and hostel accommodation is ‘conditionally acceptable’ within the 25 ANEF contour under Australian Standard 2021:2015 “Acoustics – Aircraft Noise Intrusion – Building Siting and Construction” (AS 2021), Defence does not support the construction of accommodation within the 25 ANEF contour or greater.

Developing properties for accommodation purposes within the 25 ANEF contour will further constrain the already limited opportunities for Air Force to mitigate noise impacts both now and in the future at RAAF Base Williamtown.

Furthermore, Defence does not believe that compliance with AS 2021 (in terms of the specified indoor noise level) could be practically achieved given that the maximum external aircraft noise levels at this location could be very high. It is Defence’s position that it would not be cost effective or practical to sound-proof standard accommodation units to the required level for this location. Incorporating noise attenuating features into accommodation units will not totally remove the impact that aircraft noise has on the visitors’ overall amenity, particularly their ability to enjoy the outdoor environment.

The Aircraft Noise Assessment report prepared by Muller Acoustic Consulting (MCA) which accompanied the development application outlines the proposed Aircraft Noise Reduction (ANR) requirement as per AS2021:2015 and the recommended acoustic attenuation measures, including specified building design/construction requirements, and a management plan for the (covered) common area to avoid use during peak aircraft movements.

The MCA report has determined an ANR of 35dBA based on a measured average maximum value of 90-dBA. Clause 3.2.2 of AS2021:2015 recommends that for an ANR requirement greater than 30dB, a more thorough spectral analysis and assessment is required. Defence would like Council to consider if the level of assessment is adequate, or if additional noise control analysis and assessment is required to confirm the effectiveness of the proposed acoustic attenuation.

In order to achieve the proposed aircraft noise reduction for the indoor spaces, all windows and doors must be closed, which will likely impact upon the ability to achieve natural light and ventilation for the proposed accommodation units as outlined in the Statement of Environmental Effects.

Defence operates a Noise and Flightpath Monitoring System (NFPMS) which provides details on flight activity (track and noise data) for aircraft operating at RAAF Base Williamtown.. Based on NFPMS data from 1/1/18 to 16/12/18 there were 16,863 aircraft movements within a 1.5km radius of the subject land (distance likely to impose some form of noise disturbance) which were attributed to arrivals, departures and training operations. The arrivals that overfly the subject land are a combination of straight-in arrivals, and Initial and Pitch arrivals often performed by military fast jets and turbo props. The site is also subject to departure flights for most of the year and the noise footprint associated with this type of operation mode is generally greater than that for arrival aircraft.

The NFPMS also has two Noise Monitoring Terminals (NMT) installed in close proximity to the development site (approx. 3.7km to NMT 9 and 22km to NMT 11) which provide an indication of possible noise levels/ranges which could be experienced at the development site.

A summary of the flight activity within the 1.5km radius of the subject land and the noise events and associated levels at the two NMTs is attached for your information.

Defence advises that RAAF Base Williamtown is operational both day and night, with night-time military aircraft training activities throughout the year resulting in the possibility of aircraft noise disturbances at all hours. The proposed development area is regularly overflown by low-flying aircraft and is subject to very high levels of aircraft noise. The impact of aircraft noise may not be conducive to the proposed 'tourist accommodation' use of the subject land (both indoor and outdoor activities), particularly for visitors who may be unaware of the frequency of aircraft movements and high levels of noise impact on the locality.

Notwithstanding the above advice, if Council determines that the proposal warrants approval, Defence recommends a condition of consent to ensure that all buildings are designed and constructed to be compliant with indoor design sound levels for determination of aircraft noise reduction as outlined in AS2021-2015 Acoustics – Aircraft noise intrusion – Building siting and construction.

While Defence is conscious of the noise generated by its activities and makes efforts to minimise community exposure to noise and vibration, Defence cannot readily modify its activities due to the establishment or intensification of a noise-sensitive development in proximity to RAAF Base Williamtown.

Defence requests that a property notation be placed on any S149 (5) certificate that may be issued by Council for the property advising that the property is subject to high levels of aircraft noise generated by activities at RAAF Base Williamtown.

Public Safety

The subject land is situated approximately 3km from the extended centreline of RAAF Base Williamtown runway and partly within in the Accident Potential Zone 2 (APZ II) area of Defence's recommended Public Safety Area. Under the National Airports Safeguarding Framework's recently endorsed Guideline I, "Managing the Risk of Public Safety at the Ends of Runways", Defence believes that residential land uses are incompatible within 4.55km of the ends of some military runways. The Guideline recommends that land use planning authorities not approve any development that would result in an increase in the number of people on the ground exposed to harm in the event of an aviation accident on take-off or landing.

Building Heights

The Defence Height Trigger Map for RAAF Base Williamtown identifies the height constraints for the subject land as "*Structures higher than 7.5m require assessment.*" Based on the height details provided within the Development Application documentation, the proposed structures will not infringe the Obstacle Limitations Surface (OLS) for RAAF Base Williamtown.

Whilst the proposed development will have a maximum building height of 25.8M AHD, should any construction activities, for example the use of cranes, or proposed landscaping/vegetation exceed the maximum height of 7.5 metres AGL, details are required to be provided to Defence for assessment and approval to ensure proposed structure heights will not pose a risk to safety of flying operations.

Extraneous Lighting and Glare

The proposed development is located within the Civil Aviation Safety Authority's (CASA's) 6.0km radius controlled light installation area. Defence has adopted CASA guidelines for extraneous lighting near its airfields. To mitigate potential safety issues associated with the proposed development, Defence

recommends compliance with the extraneous lighting controls detailed in the CASA Manual of Standards (MOS-139) Aerodromes.

In particular, outdoor luminaries with no upward light component (e.g. 'aero-screen' type fittings) should be used for any outdoor lighting to minimise potential conflict with aircraft operations. Defence notes that lighting design is a proponent's responsibility. If it is later found that lights or glare endangers the safety of aircraft operations, Defence or CASA may require the lighting to be extinguished or suitably modified.

Additionally, large expanses of reflective building materials are also of concern with regard to aircraft safety. To reduce this risk, Defence requests that any new structures on the land use non-reflective building materials. It is important to note that if it is later found that the external surfaces are causing daytime glare for pilots and endangering the safety of aircraft operations, then Defence or CASA may require that the surface be suitably modified to extinguish the glare.

Bird strike

The proposed development is located within 3 kilometres of RAAF Base Williamtown and in an area mapped by Defence as "Birdstrike Group C Buffer Area." In this buffer area, certain land uses that have the potential to attract wildlife should be avoided as they will potentially increase the risk of bird strike for aircraft operating from RAAF Base Williamtown.

Any organic waste and or the storage of commercial bins associated with the proposed development might be attractive to vermin and/or birds and will potentially increase the risk of bird strike for aircraft operating from RAAF Base Williamtown. Defence requests that an appropriate condition for the management of organic waste (such as maximum storage onsite and use of covered/enclosed bins) be included in any approval.

Should you wish to discuss the content of this advice further, my point of contact is Mr Greg Ahrens at DSRGIDEP.ExecutiveSupport@defence.gov.au or by telephone on (08) 7383 0420.

Yours sincerely

Land Planning and Regulation
Estate Planning Branch

15 January 2019

Attachment 1 – NFPMS RAAF Base Williamtown Fullerton Cove Analysis – Dec 2018