

EPA Services Comment	Proponent Response
<b>Social Surrounds</b>	
<p>1. It is unclear from the Environmental Review Document (ERD) what, if any, assessments have been undertaken by the City of Busselton (CoB) of the residents that will be most affected by the proposed night time operations (residents that have been identified to be within the N60 contour), to determine what amelioration measures would be required to be applied to these residences to maintain an ambient indoor noise level (50dBA) that is unlikely to lead to sleep disturbance during the proposed night time operations. Given the predictions in the ERD, it may not be appropriate to wait until a complaint is received before assessing and ameliorating residences within these contours.</p> <p>Please provide further discussion as to what assessments have been undertaken to date of residents within the N60 contour, and what amelioration is proposed to maintain an ambient indoor noise level at these residences during the proposed night time operations.</p> <p>Based on existing information in the ERD, are there any residences that warrant mitigation or amelioration before the commencement of night time flights?</p>	<p>The night N60 (one event) contour is not a criterion for noise amelioration and no assessments have been undertaken for residents located within the night N60 one event contour.</p> <p>Eligibility for noise amelioration is based on noise monitoring as this represents actual aircraft noise experienced. To date, the City of Busselton has performed noise assessments and undertaken noise amelioration at two existing residential properties in close proximity to the Airport that have qualified for noise amelioration in accordance with the noise criterion of the existing NMP (2015).</p> <p>The City has also made attempts to commence noise amelioration processes with other owners however to date those attempts have been unsuccessful.</p> <p>Amelioration measures to achieve ambient indoor noise levels in accordance with Australian Standard 2021:2015 are dependent on the existing building construction and may include:</p> <ul style="list-style-type: none"> <li>- upgrades to roofs and ceilings;</li> <li>- insulating the ceiling;</li> <li>- upgrades to windows this may include increasing glazing thickness, using double glazing or using awning style windows;</li> <li>- enclosing the eaves;</li> <li>- providing air conditioning or other mechanical ventilation;</li> <li>- upgrading external doors; and</li> <li>- sealing up openings in the walls and roof.</li> </ul> <p>Where amelioration cannot be achieved using the above measures relocation may be considered.</p> <p>The City believes there may be up to four additional residences that may be eligible for amelioration and noise monitoring will be performed on the commencement of operations to verify.</p>

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<p>2. The ERD states that L<sub>Amax</sub> contours indicate that the proposal is expected to cause an increase in the L<sub>Amax</sub> of between 3-5dB(A) at the residences closest to the BMRA.</p> <p>Please advise whether this refers to daytime or night-time noise exposure or both.</p>	<p>The L<sub>Amax</sub> contour is not time specific. It is generated by the Integrated Noise Model based on inputs including aircraft type, topography and average meteorological conditions. Further detail on the inputs for the Integrated Noise Model can be found in Appendix 6 – Aircraft Noise Modelling Report of the ERD.</p>
<p>3. Table 5-9 of the ERD discusses the maximum noise levels that will be experienced at residences but does not provide any description of the frequency at which this will occur (events/day).</p> <p>Please provide further details in relation to how many exceedances (number of events) per day can be expected by the residences.</p>	<p>The information in Table 5-9 is derived from the L<sub>Amax</sub> contours which indicate the maximum noise level resulting from a single operation of a specific aircraft type on a specific track. It does not take into account the frequency of events.</p> <p>To further assist the assessment of noise impacts N75 and N80 contours for 2038/39 are provided in Attachment 1. They indicate that in 2038/39:</p> <ul style="list-style-type: none"> <li>- up to four residences may experience (on average) between five and ten events per day above 75dB(A) and that a further two residences located adjacent to the outer contour that may experience approximately five events per day above 75dB(A); and</li> <li>- no residences will experience more than five events per day above 80dB(A).</li> </ul>

<p>4. The revised Noise Management Plan (NMP) proposes several key changes which require further explanation so that the EPA can have a clear understanding of the reasons for the changes. For example:</p> <ol style="list-style-type: none"> <li>1. the removal of the Winter/Summer curfews for General Aviation;</li> <li>2. the need for light and general aviation aircraft to prove that their aircraft do not exceed noise emissions of 65dB(A) for unrestricted operations;</li> <li>3. changes to the noise level acceptability and noise criterion (see Item 5).</li> </ol> <p>Please provide further discussion and justification for the proposed changes</p>	<p>The City of Busselton has simplified the structure of the Noise Management Plan standard hours of operation and proposes to distinguish aircraft on the following basis:</p> <ul style="list-style-type: none"> <li>• Emergency Services (exempt from operating hour restrictions);</li> <li>• Scheduled Services* (0600-0000hrs with up to five flights per week between 0000-0600hrs); and</li> <li>• General Aviation (including light aviation) (0600-2200hrs).</li> </ul> <p>* Note: Scheduled services include RPT, open and closed charter services.</p> <ol style="list-style-type: none"> <li>1. As part of this process light and general aviation categories have been merged and light aviation are now subject to a 2200hrs curfew (previously unrestricted) and general aviation hours of operation extended to 2200hrs to allow for further operational activity. It is not expected that this will have any material impact on the environment as pilots are required to be night rated by CASA to fly at night and hence the number of night flights is predicted to be low.</li> <li>2. Aircraft operating in Australia must meet noise standards in the Air Navigation (Aircraft Noise) Regulations 1984 (Cth) which considers aircraft noise emissions. It is not practical (or enforceable) to manage airport operations on specific noise levels or aircraft types and hence the requirement to prove aircraft noise emissions which are dependent on many factors including the type of aircraft, location of the aircraft, the location of the receiver, meteorological conditions and topography (amongst other things).</li> <li>3. For discussion on the changes to the noise level acceptability and noise criterion please see the response to Item 5.</li> </ol>
<p>5. A technical review, undertaken by the DWER, of the ERD and Noise Modelling Report prepared by To70 indicates that although the</p>	<p>See Section below 'Expert Report'</p>

<p>projected increase of aircraft movements is small, the increase of the aircraft noise impact on the residences in the vicinity of the BMRA is likely to be significant, particularly at night time.</p> <p>Please provide a full and reasoned response to the matters raised in the attached technical report (attachment 2) (pages 5-8), with particular regard to the proposed changes to noise level acceptability and noise criterion, and why this would be considered acceptable at night time</p>	
<p>6. Please provide further discussion as to how the CoB will ensure that flight paths at night and the proposed 5 flights per week (10 movements) between 0000hr to 0600hr is not exceeded.</p> <p>What ability does the CoB (or any other agency) have to enforce the proposed flight paths and this curfew?</p>	<p>All Open/Closed Charters and RPT/Commercial Operators require the City's approval before using the airport. The NMP is a Council endorsed plan by which City officers are bound to comply with and as such are unable to approve more than five flights per week between the hours of 0000-0600hrs in accordance with Chapter 3.1.3 of the NMP.</p> <p>With respect to managing and enforcing flight paths the City of Busselton has no jurisdiction over airspace, that jurisdiction is held by the Commonwealth and is managed by a number of bodies including Airservices Australia and the Civil Aviation Safety Authority (CASA). The airspace around BMRA is classified as "Class G" airspace. This means that the airspace is uncontrolled, but aircraft must still follow visual flight rules (VFR) and/or instrument flight rules (IFR) and comply with safety regulations.</p> <p>As a responsible airport operator the City of Busselton engages with airport stakeholders (including aircraft operators) and uses mechanisms such as the instrument flight procedures (VFR and IFR) design, publishing departure and approach procedures in AIP (ERSA) and fly neighbourly agreements to ensure that where possible designated flight paths are utilised and impacts on the surrounding residences are minimised. Further, commercial operators of large jet aircraft are more likely to use the published departure and approach flight paths due to their stricter operational procedures and ability to deviate. .</p>

EPA Expert Report								
<b>Comments on the increased noise impact</b>								
1. Currently the majority of aircraft using BMRA are small general and recreational aviation (GA) and emergency service fixed wing aircraft and helicopters. At present there are 24 closed charter movements for Fly-in Fly- out (FIFO) purposes every week, which accounts for 12% of the total aircraft movements. Large jet aircraft contribute more to the noise impact per movement on the residences in the vicinity of the BMRA	Noted.							
2. The proposed modification is to introduce 10 RPT and freight aircraft movements every week in 2018-2019, 20 in 2023-24, 22 in 2028-29 and 32 in 2038-39. By comparison, the projected approved closed charter movements for FIFO are 22 in 2018-19, 26 in 2023-2024, 30 in 2028-29 and 30 in 2038-29. Ranging from about 50% to over 100% across the projected years, the increase of the jet aircraft movements caused by the proposed modification is therefore significant.	<p>The aircraft movements detailed in the EPA Expert report represent accumulative aircraft movement numbers and not additional new movements for the specified periods.</p> <p>When starting with a low base number of movements, it is misleading to rely on percentages to draw the conclusion that the proposed modification is significant. In reality, there is a small absolute increase in the number of jet aircraft operations over a long period of time. The City of Busselton also notes that under its existing environmental approval it could increase jet aircraft operations (including interstate services) without requiring further environmental approvals (subject to complying with the conditions set out in Ministerial Statement 1009).</p>							
3. The majority of the closed charter aircraft are Fokker 100s, and the aircraft proposed for RPT and freight are Boeing 737s. According to Australian Standard AS 2021:2015 (Acoustics – Aircraft noise intrusion – Building siting and construction), the Boeing 737 is a much noisier aircraft than the Fokker 100.	<p>The Boeing 737-800 was used for noise modelling as it is the noisiest narrow bodied jet aircraft likely to utilise the airport. Depending on airlines and their available fleet it is possible that the quieter A320 may be used however until an airline is engaged this cannot be confirmed and therefore the City modelled on the worst case scenario. Future technological improvements in aircraft design and engineering are expected to result in the new generation jet aircraft being progressively quieter.</p> <p>Referencing AS2021:2015, at fixed distances on the centre line from runway 03/21 thresholds, the following information is presented;</p> <table border="1" data-bbox="1016 1321 2047 1396"> <tr> <td></td> <td>A320-232</td> <td>A320-232 Departures</td> <td>B737-800</td> <td>B737-800 Departures</td> <td>F100 Arrivals</td> <td>F100 Departures</td> </tr> </table>		A320-232	A320-232 Departures	B737-800	B737-800 Departures	F100 Arrivals	F100 Departures
	A320-232	A320-232 Departures	B737-800	B737-800 Departures	F100 Arrivals	F100 Departures		

		Arrivals		Arrivals			
	2500m from runway end	81dB(A)	82 dB(A)	85dB(A)	87dB(A)	82dB(A)	80dB(A)
	5000m from runway end	75dB(A)	71dB(A)	78dB(A)	79dB(A)	76dB(A)	75dB(A)
	<p>The above noise levels have been taken directly from AS2021:2015 which indicate that for the two fixed distances directly from the end of the runway thresholds, the noise levels experienced by a F100 aircraft are not significantly different to the A320 and fall within a range of 3-7dB(A) difference to the B737-800.</p>						
<p>4. It is projected that the majority of the approved closed charters will operate in the daytime (85%) for all the years forecast. However, the majority of the RPT will operate at night until 2023 (100% in 2018-19 and approximately 71.6% in 2022-23). Even in 2039 when the proportion of night flights is reduced, the number of night-time RPT flights is still significantly higher than the number of closed charter flights. Noise impact from a night aircraft movement is significantly higher than a daytime aircraft movement (equivalent to 4 times).</p>	<p>The City acknowledges that the potential noise impact of night-time aircraft is greater than daytime aircraft. However the noise modelling undertaken by the City takes into account the impact of night flights (1900-0700hrs) by using a weighted factor of four events for one night movement compared to day time movements.</p> <p>To mitigate potential impacts:</p> <ul style="list-style-type: none"> <li>- flights between 0000-0600hrs have been restricted to five flights per week; and</li> <li>- the noise amelioration criteria weight night time events (1900-0700hrs) four times greater than a daytime event;</li> <li>- the City continues to work on flight path design to minimise residential overflights; and</li> <li>- Enter into Fly Neighbourly Agreements with commercial operators.</li> </ul>						
<p>5. Under the current approved operation, charter flights and RPT flights, as well as any aircraft that does not comply with the Light Aviation definition, require the City’s approval subject to noise not exceeding 85 dB(A) at any residential location. The proposed modification will see aircraft noise levels exceeding 85 dB(A) at least, at one close residence</p>	<p>In accordance with the NMP, where noise levels exceed 85dB(A) on a regular basis the noise amelioration process will be activated. Discussions are already taking place with impacted residents.</p>						

<p>6. Under the current approved operation, no flight is allowed during the most sensitive night-time period between 2300 and 0600 hours. However, the proposed modification will seek five approved RPT flights per week between 0000 and 0600 hours. This indicates that there will be residences in the vicinity of BMRA being exposed to up to 85 dB(A) aircraft noise during this most sensitive night-time period (or equivalently 75 dB(A) inside the residences). At this noise level disturbance to sleep is highly likely.</p>	<p>Under the current approved operation the following flights are allowed during the night time period:</p> <ul style="list-style-type: none"> <li>• Emergency Services;</li> <li>• Light Aviation; and</li> <li>• 12 non-conforming activities that can be approved by the City of Busselton CEO.</li> </ul> <p>The proposal allows up to five flights per week between 0000 and 0600 hours. If as a result of the proposed jet aircraft night operations residents are adversely impacted in accordance with the NMP, the City of Busselton will implement noise amelioration measures or amend the operations to mitigate the noise impact thus reducing the noise levels to an acceptable standard as detailed in the NMP Chapter 6.2.2 Table 7.</p>
<p>7. Stratenen states in the ERD that the proposed expansion will increase the LAmax level in the vicinity of BMRA by 3-5 dB(A), which may represent a small but noticeable change in loudness. However, this level of increase is significant in terms of noise impact, particularly on the residences in the vicinity of BMRA, where the existing noise exposure level is already high. Furthermore, Table 5-9 of the ERD indicates that the increase of the LAmax level in the vicinity of BMRA may be even higher. For instance, it is indicated in Table 5-9 that when using Runway 03 departing straight out, LAmax level at residences in Reinscourt will be increased from 60-70 dB(A) from existing F100 aircraft to 65-80 dB(A) from the proposed B737-800 aircraft. This may represent an increase of up to 10 dB(A)</p>	<p>Table 5.9 of the ERD provides a description of the change in sound levels for an area defined between the contour lines and not at any specific fixed location. The change for any specific fixed location is estimated to be in the range of 3-7 dB(A) . This is also supported by the AS2021:2015 Noise Level Tables by Jet Aircraft.</p> <p>In terms of sound perception, 3dB(A) is the minimum change in sound level that most people can detect.</p>
<p><b><i>Proposed change to the guide to noise level acceptability</i></b></p>	
<p>Under the current Noise Management Plan (NMP; 2015) there are two acceptability levels for noise below 75 dB(A): being Acceptable at &lt;65dB(A) and Generally Acceptable at 65-75 dB(A). According to the 2015 NMP, no noise reduction measures are required under normal circumstances when aircraft noise is within</p>	<p>The noise level acceptability criteria defined in the NMP 2015 were developed by the City of Busselton for the original NMP in 2012 and based on the existing operations at the time.</p> <p>The proposed three levels of acceptability, Acceptable, Conditionally Acceptable and</p>

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<p>the Acceptable level, while operational controls to reduce the impact can be considered when noise is within the Generally Acceptable levels. The proposed change (2017 draft NMP) removes the Generally Acceptable level, and combines Acceptable and Generally Acceptable levels into one single Acceptable level for noise below 75 dB(A). By doing this, 75 dB(A) is considered as an acceptable aircraft noise level and no noise mitigation measures (including the operational measures) are required for any residences exposed to aircraft noise levels below 75 dB(A).</p>	<p>Unacceptable are taken directly from AS2021:2015 Chapter 2.3 Action Resulting from Acceptability Determination. The Standard applies the ANEF values to building site acceptability. For residential properties (houses, flats, homes) and caravan parks, an ANEF of less than 20 is considered acceptable, between 20 to 25 conditionally acceptable and greater than 25 as unacceptable. If the City applied this methodology the noise modelling indicates that no residences would fall within the ANEF 20 contour.</p> <p>The City adopted the noise levels of less than 75dB(A), 75-85dB(A) and greater than 85dB(A) respectively as the outdoor levels as a compromise between the AS2021: 2015 use of ANEF and Appendix E (method for determining building siting acceptability for light/general aviation aerodromes without ANEF charts) which identifies aircraft acceptable, conditionally acceptable and unacceptable noise levels based on the number of flights per day. Table E1 determines that for houses, units, flats, caravan parks, schools, universities, hospitals and nursing homes, where a building site experiences between 15-30 flights per day, less than 80dB(A) is acceptable, 80-85 dB(A) is conditionally acceptable and greater than 85 is unacceptable.</p> <p>The City has adopted a lower threshold for the acceptable level (75dB(A)) as compared to 80dB(A) for aerodromes without ANEF charts (Appendix E AS2021:2015).</p>
<p>It is known that a 75dB(A) outside noise level would generally result in an internal noise level of approximately 65 dB(A) if windows are partly open. This is significantly higher than the design criterion of 50 dB(A) for noise in sleeping areas of houses etc, as recommended by AS 2021:2015. At this level of internal noise, conversation and sleep are highly likely to be disturbed. Removing the Generally Acceptable criterion will remove the requirement to provide noise mitigation measures to those neighbouring residents who are sensitive to noise and annoyed by a noise level up to 65 dB(A) inside their bedrooms</p>	<p>The acceptability categories have been adapted from Table E1 in Appendix E in AS2021:2015 to allow for noise amelioration criteria to be met. Based on Table E1 of Appendix E (AS2021), residential properties in the vicinity of the airport will not be subject to the volume of over flights to justify having a 65dB threshold of acceptability.</p>
<p>It is also noted that, under the Flight Training Guidelines, the noise level of single engine aircraft that can be approved by the City has</p>	<p>The flight training guidelines restricts flight training permits to single engine aircraft under a maximum take-off weight of 1500kgs limiting the potential aircraft noise</p>



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<p>increased from the current level of 65 dB(A) to 85 dB(A). An increase of 20 dB is subjectively a fourfold increase in the perceived noise level. There also seems to be no upper limit on the total flight training circuits that may be approved. It may be appropriate for the City to demonstrate why this substantial increase in level is necessary</p>	<p>emissions. In general, light aircraft (with MTOW less than 1500kgs) emit low noise emissions (&lt;75db(A)) and the 85dB(A) represents a noise level that may trigger noise amelioration applicable to all aircraft.</p> <p>Further, It is not practical (or enforceable) to manage Airport operations, including flight training by restricting specific aircraft noise emissions or types.</p> <p>The number of continuous flight training circuits has been set at 6 in any one flight training session in the proposed NMP (2017) which has been increased from 4 in the approved NMP (2015). The proposed increased is based on consultation with the local Aero Club (OEPA and City approved flight training operator) which requested a minor increase in circuit numbers to make their flight training sessions cost effective for students. Further, since the implementation of the NMP (2012), noise complaints regarding flight training have significantly reduced due to the permit approval process required to be met by flight training operators and to date there has only been one permit issued by the City of Busselton for approved flight training.</p>
<p><b><i>Proposed change to the noise criterion for amelioration</i></b></p>	
<p>There is a significant change to the Noise Criterion for Amelioration in the proposed new NMP, where outdoor noise Criterion 4: 65 dB(A) for &gt;20 events per day is totally removed; Criterion 3: 75 dB(A) formerly set at 12 events per day is increased to 30 events; and Criterion 2: 80 dB(A) formerly set at 6 events per day is increased to 15 events.</p> <p>It is stated in the ERD that the City of Busselton utilises AS 2021:2015 as the basis for its noise assessment and amelioration process, which seems to be referring to the Building Site Acceptability criterion given in Table E1 of Appendix E of AS 2021:2015. However, it does not seem that Table E1 of Appendix E of AS 2021:2015 can apply to the BMRA. It is indicated in this Informative Appendix that the values in Table E1 only apply to small aerodromes with a small number of civil, non-jet aircraft movements and are not to be used in any other circumstances. It is understood that BMRA operations currently include jet aircraft</p>	<p>The noise level acceptability criteria defined in the NMP 2015 were developed by the City of Busselton for the original NMP in 2012 and based on the existing operations at the time.</p> <p>The proposed noise criterion have been based on AS2021:2015 Appendix E, Table 1. The principle behind Table E1 in Appendix E is that the maximum acceptable noise levels reduce as the number of overflights increase. The City has broadly adopted the maximum acceptable levels from Table 1 of Appendix E1. In the absence of any other industry standards, the City has avoided the use of ANEF 20 for jet aircraft aerodromes (AS2021:2015) and adapted the existing noise criterion which were purposely developed for the NMP (2012) based on the airport operations at the time.</p>

<p>movements, and is proposing more jet aircraft movements. In addition, the number of flights per day listed in column 1 of Table E1 in Appendix E reads to be the total daily number of flights, instead of the number of events at a particular noise level. This means that Table E1 may have been misquoted when creating the new Noise Criterion for Amelioration, even if it was considered to apply to BMRA.</p>	
<p>It is understood that the Noise Criterion for Amelioration in the current NMP was set up after extensive consultation and studies and seems to be working well for BMRA as a regional airport. This has provided the residents in the vicinity of BMRA with certainty regarding protection over the increase of noise impact. It has been assessed in the ERD that, as of 2038-39 no residences are expected to be exposed to 30 or more events per day at 70 dB(A); no residences would be exposed to more than 15 events per day at 80 - 85 dB(A); or more than 30 events per day at 75 - 80 dB(A). This basically indicates that under the new Noise Criterion for Amelioration, no amelioration measures are required with the proposed airport expansion, except for one residence to the south-west of the BMRA along Acton Park Road, where the L<sub>Amax</sub> level will be increased to above 85 dB(A) due to the proposed expansion.</p>	<p>The N-70 contours used in the ERD show the average number of events over a 365 day period and hence it is likely that due to the actual scheduling of flights per day that residences in the vicinity of the BMRA will qualify for noise amelioration under the proposed noise criterion.</p> <p>The City has addressed the points detailed in this summary throughout the response to submissions.</p>

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<b>The Proposal – General Comments</b>			
<b>Issue</b>	<b>Submitter</b>	<b>Submission and/or issue</b>	<b>Response to comment</b>
1	7 x Anonymous	<p>The submitters raise matters in relation to the need for the proposed changes to airport operations, particularly when there appears to be no demand from operators for such flights to occur.</p> <p>Please provide justification for the proposed pursuit of night time operations when there appears to be no industry demand.</p> <p>Refer to Sub 1, ANON-GMHC-JDD5-6, ANON-GMHC-JD39-G, Sub 12, ANON-GMHC-JD4K-C, ANON-GMHC-JD47-R and ANON-GMHC-JD4Y-T for further details.</p>	<p>The City of Busselton has undertaken various studies on the viability of airline routes. As part of the State Government Business Case it engaged experienced aviation specialists to complete a passenger demand and route viability study for domestic services. The report identified that interstate services to Melbourne and Sydney were viable. Since then discussions with commercial airlines and more recent studies undertaken by the City of Busselton and Tourism WA continue to support this conclusion.</p> <p>The City of Busselton is not actively pursuing night time operations. However, initial discussions with airlines interested in the Busselton route have suggested that night services may be the most optimal to commence the new route.</p>
2	Anonymous	<p>The submitter raises concerns over why the CoB would continue to approve residential subdivisions adjacent to the airport knowing they would be seeking to have the airport upgraded to international standards.</p> <p>Please provide details as to why land use planning measures have not been implemented to prevent the encroachment of residential areas into areas that could be affected by forecast airport expansions.</p> <p>Refer to Sub 1 for more details.</p>	<p>The premise of the submission appears to be that there has been encroachment of residential development into areas that may be affected by unacceptable noise from the Airport. The City maintains that there has been no such encroachment on residential areas. Further the submission refers to land development in the Provence area, the City at the time of approving this development required a notification (relevant to the location of the Airport) to be applied to all land titles for this residential area.</p> <p>The overall pattern of residential growth in Busselton that has occurred since the Airport was first developed is set out in the 1999 Busselton Urban Growth Strategy. That strategy is expected to be replaced (subject to Western Australian Planning Commission (WAPC) final approval) by the City of Busselton Local Planning Strategy in the near future.</p> <p>Both strategies (mentioned above) indicate that any future urban development in proximity to the Airport and to the south of the</p>

			<p>Outer Bypass will be industrial in nature.</p> <p>There is some planned residential expansion in the Yalyalup locality, to the east of the currently developed portions of the ‘Provence’ Estate, which is identified in both strategies. The latest noise modelling indicates that further consideration of airport noise issues may be required before residential development can proceed in some of that area. The City has and is continuing to consult with WAPC and the landowners / developers in regard to this matter.</p> <p>Once the environmental review process for the BMRA proposal has been completed, and the noise management standards for the Airport have been approved, it will then be possible to determine how that should be reflected in the land use planning for the area identified above (Yalyalup locality). It is possible that a portion of that area will require higher construction standards to ensure that interior noise levels are acceptable in future housing.</p> <p>Further, once the environmental review process is complete, the City will also initiate an amendment to the City’s Town Planning Scheme (TPS) to revise the statutory ‘buffer’ controls, in the form of a Special Control Area (identified as the Airport Protection Zone in the current TPS). As with the area described above, it will only be possible to determine the final extent and detailed provisions of the new Special Control Area once the environmental review process is complete. It is clear, however, that no further areas of planned residential expansion will be affected.</p>
3	Department of Planning, Heritage and Lands (DPHL)	The DPHL has no objection to the proposed modifications, however, advises that the Special Control Areas reflected in the current Land Planning Scheme No. 21 be progressed to reflect any changes to operations to	Noted, further a TPS amendment will be progressed following the outcome of the Environmental Approvals Process.

		ensure ongoing and effective land use control.	
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4	17 x Anonymous	<p>The submitters contend that the proposed use of larger aircraft during night time operations has the potential to negatively impact on the health, wellbeing and amenity of residents through unreasonable increases in night time noise exposure.</p> <p>Please provide responses to the following matters raised:</p> <ol style="list-style-type: none"> <li>1) Why does the CoB consider it acceptable to allow noise exposure of 85dB(A) over residential areas such as Yalyalup and Reinscourt when the usual noise level for such an airport is 65dB(A) over residential areas?</li> <li>2) What measures does the CoB propose to implement to ensure residences are not negatively impacted by the proposed night time operations?</li> <li>3) What assurance can the CoB provide regarding the cessation of night time operations once an interstate route is established?</li> <li>4) Has consideration been given to the runway extension and the reduced distance between residences and the new runway – it appears that the CoB has modelled noise using an 1800m runway not the proposed 2340m runway.</li> </ol>	<ol style="list-style-type: none"> <li>1) The noise modelling does not indicate exposures of 85dB(A) for residential areas such as Yalyalup and Reinscourt. It is unclear where the submitter has obtained the ‘usual noise level’. If the submission is referring to the U.S. Federal Aviation Authority’s 65 dB(A) Day Night Level for residential communities this is an average cumulative noise exposure level which corresponds with an ANEF 30.</li> <li>2) The City of Busselton has the following measures in place to ensure that the impacts of night time flights are minimised: <ul style="list-style-type: none"> <li>- imposed a cap on night time flights between the hours of 0000 to 0600 at five flights per week;</li> <li>- comprehensive noise amelioration process for ameliorating noise affected residences; and</li> <li>- engaging an Instrument Flight Path Designer, with Airservices Australia endorsement, on flight path design.</li> </ul> </li> <li>3) The City is unable to provide assurance that night time flights will cease once interstate routes are established. However the City has been advised by airlines that flights are likely to revert to the daytime or early evening once routes are established.</li> <li>4) Yes consideration has been given to the runway extension. The estimated new 03/21 threshold coordinates for the extended runway were provided for the noise modelling. The estimated coordinates have since been checked and they are accurate for the purposes of the noise modelling.</li> </ol>

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		<p>Refer to Sub 6, Sub 1, ANON-GMHC-JD4N-F, ANON-GMHC- JD4X-S , ANON-GMHC-JD4P-H, ANON-GMHC-JD3F-6, Sub 11, ANON-GMHC-JD3D-4, ANON-GMHC-JD3Y-S, ANON-GMHC-JD37-Q, Sub 10, ANON-GMHC-JD3B-2, ANON- GMHC-JD4F-7, ANON-GMHC-JD4K-C ANON-GMHC-JD3P- G, ANON-GMHC-JD3T-M, ANON-GMHC-JD3M-D, ANON- GMHC-JD4S-M, ANON-GMHC-JD4B-3, ANON-GMHC-JD4T-N and ANON-GMHC-JD49-T for further details</p>	
5	Anonymous	<p>The submitter considers that the flat surroundings of the Busselton area mean that noise can carry farther and have a wider and more severe impact than in other regional areas of WA.</p> <p>Has consideration been given to the potential for the flat landscape to facilitate a wider noise exposure?</p> <p>Refer to ANON-GMHC-JD34-M for further details.</p>	<p>Yes, consideration has been given to the flat landscape. The noise contours produced in the ERD by the integrated noise model import topography data from NASA (please refer to Appendix 6 of the ERD for details about the inputs to the integrated noise model).</p>
6	Anonymous	<p>The submitter raises concern that the Noise Abatement Zones seem to conflict with the proposed flight paths. The airport project document shows flights at 250-500 metres as they pass Bussell Highway, whereas the assessment of predicted impacts suggests an altitude of approximately 500-750m will be maintained.</p>	<p>The figures provided in the Airport project document show altitudes of between 200-500m at Bussell Highway, whereas the information provided in Section 5.8.1 Aircraft flight paths and altitude show altitude levels for Reinscourt, which are estimated to be at least 1km further away from the end of the runway.</p> <p>The impacts of aircraft movements have been considered and the City intends as part of the Instrument flight procedures design to</p>

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		<p>Please provide clarification over the actual predicted altitudes of departing flights and how the impacts of these on residents has been considered.</p> <p>Refer to ANON-MHC-JD49-T for further details.</p>	<p>investigate flight paths that will minimize the overflight of residential areas. As this work has just commenced, the City is unable to qualify exactly what measures can be put in place at this time.</p>
7	3 x Anonymous	<p>The submitters raise concerns over the proposed changes to the noise mitigation criteria which makes it harder for residents to be considered eligible for noise amelioration and compensation. The submitters raise concern that AS2021:2015 refers to indoor noise criteria of 50dB(A) for sleeping areas and yet the CoB is proposing 70-80dB(A) for these residents and considers that it is acceptable.</p> <p>Provide further details on how eligibility for amelioration will be determined and what mitigation will be provided to residences likely to experience night time noise exposure in excess of 50dBA (indoor).</p> <p>Refer to Sub 12, Sub 13 and Sub 15 for further details.</p>	<p>Eligibility for noise amelioration will be based on actual noise monitoring data recorded at residential properties and criterion set out in the NMP.</p> <p>Mitigation measures for sleeping areas may include the following;</p> <ul style="list-style-type: none"> <li>- upgrades to roofs and ceilings;</li> <li>- insulating the ceiling;</li> <li>- upgrades to windows this may include increasing glazing thickness, using double glazing or using awning style windows;</li> <li>- enclosing the eaves;</li> <li>- providing air conditioning or other mechanical ventilation;</li> <li>- upgrading external doors; and</li> <li>- sealing up openings in the walls and roof.</li> </ul> <p>The proposed noise criterion have been based on AS2021;2015 Appendix E, Table 1. The principle behind Table E1 in Appendix E is that the maximum acceptable noise levels reduce as the number of overflights increase. The City has broadly adopted the maximum acceptable levels from Table E1 of Appendix E1. In the absence of any other industry standards, the City has avoided the use of ANEF 20 for jet aircraft aerodromes (AS2021;2015) and adapted the existing noise criterion which were purposely developed for the NMP (2012) based on the airport operations at the time. The City has adapted the noise criterion from the NMP (2012) relative to the proposed operations.</p>

8	3 x Anonymous	<p>The submitters raise matters in relation to the noise modelling not accurately identifying the true extent of residences that are likely to be impacted by the proposed changes to airport operations.</p> <p>Please provide responses to the following matters raised:</p> <ol style="list-style-type: none"> <li>1) Is the CoB able to provide additional information to show what a typical day at the BMRA would be like for surrounding residents, which takes into consideration current and proposed operations?</li> <li>2) The submitters contend that ANEF contours are misleading and do not provide an estimate of noise impact at regional airports with any reliability. Can the CoB provide further justification regarding the use of Australian Noise Exposure Forecast (ANEF) contours and their relevance to this situation?</li> <li>3) Is the CoB able to make L<sub>Amax</sub> noise modelling maps available which show 60dB(A) noise contour lines?</li> <li>4) Given there is no criteria to establish acceptability or unacceptability of the potential impacts of new aircraft noise on existing residential areas, how has the CoB concluded that the potential impacts are acceptable?</li> </ol> <p>Refer to Sub 10, ANON-GMHC-JD43-M and</p>	<ol style="list-style-type: none"> <li>1) It is very difficult to provide an example of a typical day, however the City has provided an example of a typical week at the BMRA. The noise modelling (N70s) are a prediction of an average day based on all the variables input into the Integrated Noise Model. An indicative summer schedule is provided in Attachment 2.</li> <li>2) The ANEF system is a well-established and technically complete means of portraying aircraft noise exposure (NASF Measures for Managing Impacts of Aircraft Noise Attachment A). ANEF/ANEC contours are a useful tool for describing the cumulative aircraft noise for an average annual day and take into account the loudness, frequency, duration and character of the noise). They are particularly useful as a land use planning tool. It is generally accepted that data produced by the ANEF system is difficult for people to interpret due to the fact it does not reflect how people experience noise events in their day to day lives. Because of this they are presented along with other descriptors including number above contours, single-event diagrams and population exposure estimates. In the ERD no particular emphasis has been placed on ANEC versus the other descriptors.</li> <li>3) The City can make available single event contour maps with 60dB(A) contours (Attachment 3).</li> <li>4) There are well established industry standards for determining the acceptability or unacceptability of aircraft noise that are referenced in Australian Standard 2021:2015 and the National Airports Safeguarding Framework and utilised by both regional and major City Airports in their Master Planning and Environment Approval processes. The City of Busselton (in the ERD) has used industry best practice and standards in the analysis of the potential impacts.</li> </ol>
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		Sub 13 for further details.	
<b>Flight Paths</b>			
9	13 x Anonymous	<p>The submitters raise matters relating to the use of flight paths that go over residential areas, particularly night time operations, when the airport is surrounded by predominately rural and vacant land to the North, East and South that should be utilised for flight paths. The ERD states that due to the uncontrolled airspace there are no defined flight paths and ‘there may be a variation in the actual flight paths from those assumed in the noise modelling’ which ‘presents a degree of uncertainty for LAmx and N contours’. This creates uncertainty regarding the potential impacts of the proposed changes to operations.</p> <p>Please provide response to the following matters raised:</p> <p>1) Has adequate consideration been given to the use of flight paths that avoid overflying residential areas such as Reinscourt, Geographe and Central Busselton?</p> <p>2) Given the variability of flight paths that can occur as a result of weather and traffic forecasts, is the CoB able to provide an indication of the alternative flight paths that may be utilised in such circumstances so that residences have an awareness of additional impacts?</p>	<p>1) Yes the City acknowledges the communities concern relating to flight paths and has already liaised with current jet aircraft operators to minimize overflying these areas where possible (aircraft safety takes precedent). The Instrument Flight procedures design will further consider and investigate if approach and departure flight paths can be designed to minimize aircraft noise.</p> <p>2) The BMRA is in uncontrolled airspace and hence the City of Busselton is unable to comment on alternative flight paths. The City will engage a Flight Instrument Procedures designer to design new approach and departure flight paths for the newly constructed runway thresholds.</p>

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		Refer to ANON-GMHC-JD4Y-T, ANON-GMHC-JD49-T, ANON-GMHC-JD3R-J, ANON-GMHC-JD4S-M, ANON-GMHC- JD43-M, ANON-GMHC-JD34M, ANON-GMHC-JD3X-R, ANON-GMHC-JD38-R, ANON-GMHC-JD4B-3 ANON-GMHC- JD4N-F, ANON-GMHC-JD3K-B, Sub 10 and ANON-GMHC-JD33-K for further details	
10	Anonymous	<p>The submitter objects to the flight path passing over Nannup.</p> <p>Please provide further discussion on whether the potential impacts of the proposed changes on surrounding towns has been considered?</p> <p>Refer to ANON-GMHC-JDDU-6 for further details.</p>	<p>There is no evidence to suggest that the proposed jet aircraft operations will overfly Nannup or surrounding townships such as Dunsborough, Yallingup, Margaret River, Bunbury or others in the South West. Pilots of jet aircraft such as B737-800 and A320 are expected to make every effort to reach ‘cruising altitude’ as soon as possible. At a distance from the BMRA to Nannup a jet aircraft would be approximately 13-15000ft outbound and 8000-9000ft inbound (based on flight arrivals/departures from Perth Airport) and hence any noise overflying a surrounding town such as Nannup would be negligible.</p>
11	Anonymous	<p>The submitter raises concern that pilot training circuits will be reinstated as part of the acceptable airport operations.</p> <p>Is the CoB able to provide certainty to residents that pilot training circuits will not be reinstated?</p> <p>Refer to ANON-GMHC-JD49-T for further details</p>	<p>Flight Training already occurs at the BMRA in accordance with the Flight Training Guidelines in the NMP. The NMP is clear in its intention to restrict flight training to light single engine aircraft (less than 1500kgs) that require an approved permit from the City of Busselton. The Airport Local Law also restricts flight training operators from using the BMRA for flight training purposes without a permit.</p>
12	Anonymous	<p>The submitter raises concern that the Fly Neighbourly Agreement referred to in the NMP is a voluntary code and does not provide residents with peace of mind and protection regarding non-compliance by</p>	<p>The City of Busselton does not have jurisdiction over airspace. That jurisdiction is held by the Commonwealth and is managed by Airservices Australia and the Civil Aviation Safety Authority.</p> <p>A Fly Neighbourly Agreement (FNA) is a voluntary code between the</p>

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		<p>operators.</p> <p>Please provide further discussion on how the CoB will manage non-compliances to ensure residents are not detrimentally impacted by operations outside of that which is deemed allowable.</p> <p>Refer to Sub 10 for further details.</p>	<p>airport operator and aircraft users that includes measures to reduce the noise impact of aircraft operations on residential areas near airports. As a responsible airport operator the City of Busselton actively works with airport users to ensure that where possible, they comply with the FNA. Whilst deviation from a FNA does not result in a formal non-compliance, where operators have acted outside an FNA, the City does request explanations / justification and liaises with them to ensure that the where possible the FNA is followed. FNA's are common practice at both regional and City airports and generally aircraft operators comply with them.</p>
13	Air Services Australia	<p>The submitter advises that the Australian Noise Exposure Concept (ANEC) outlined in the noise modelling report has not gone through any formal endorsement process by Air Services Australia (ASA) and cannot be used for land planning purposes.</p> <p>Please advise whether there are plans for the proposed ANEC to be formally endorsed by ASA.</p> <p>Refer to ANON-GMHC-JD44-N for further details</p>	<p>The City expects to revisit the ANEFs, ANEIs and potentially the ANECs (if required) once the proposed RPT operations commence. This is so that actual aircraft data can be used (ANEIs) and when more accurate traffic forecasts are expected to be available. It would be at this time that the City would seek to have the ANEF endorsed by ASA.</p>
14	6 x Anonymous	<p>The submitters raise matters relating to the changes outlined in the draft 2017 NMP and consider the proposed amendments to the NMP should be supported by a table justifying each proposed change, with particular regard to the following:</p> <ol style="list-style-type: none"> <li>1) what is the reason for the proposed amendments to section 3.1.3 and section 3.2 to remove the restriction on aircraft exceeding 85dB(A) are</li> </ol>	<p>The City responds to the proposed changes in Section 3.1.3 as follows:</p> <ol style="list-style-type: none"> <li>1) The removal of the wording to restrict aircraft noise from exceeding 85dB(A) is required as it is impractical to manage aircraft noise based noise levels or aircraft types. The noise generated by aircraft is due to a number of factors including; <ul style="list-style-type: none"> <li>- aircraft type;</li> <li>- aircraft position in space;</li> <li>- the location of the receiver; and</li> <li>- meteorological conditions.</li> </ul> </li> </ol>

		<p>unacceptable?</p> <p>2) how will the costs of noise amelioration packages, including investigations, be funded. consideration should be given to amending Page 20 – Section 3.1.3 Hours of Operation to address the following:</p> <p>3) Helicopter operations should be discussed separately to Emergency Services operations.</p> <p>4) Light Aviation/General Aviation- maximum noise level not to exceed 70dB(A) not 85dB(A).</p> <p>5) Open/Closed charter/RPT and Commercial (Freight) operations be separated.</p> <p>6) Freight operations should be restricted to 0700 to 1900 as modelled by To70.</p> <p>7) What justification does the CoB have for altering the process outlined in AS2021:2015 for residences within the Airport Protection Zone? Altering the criteria just to allow 737-800 planes which exceed 85dB(A) to operate at night is not adequate justification.</p> <p>8) why does the CoB propose to remove the requirement for an application for a non-conforming activity that is not a single event or circumstance to be referred to the EPA?</p>	<p>Hence the same aircraft may in one circumstance exceed 85dB(A) and in another not exceed 85dB(A). The intention of the “maximum noise limit” is not to prohibit aircraft from using the BMRA following a one off exceedance as the previous wording implied but to manage exceedances through the following processes as outlined in the NMP and was never intended as a noise limit which is made clear in the EPA report however regular exceedances were a trigger for noise amelioration.</p> <p>2) The Airport Development budget includes an allocation for noise amelioration. Any future noise amelioration packages (following completion of the project) will be funded by the City of Busselton.</p> <p>3) Helicopters (other than emergency services) currently fall under the general aviation category. This point can be considered in future revisions of the NMP.</p> <p>4) Noise limits are not practical or enforceable. The sound level is dependent on many factors including the type of aircraft, location of the aircraft, the location of the receiver, meteorological conditions and topography.</p> <p>5) Open/Closed charter/RPT and Commercial (Freight) are all scheduled services using comparable jet aircraft and is not considered practical to manage the airport operations based on aircraft type or noise levels.</p>
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<b>RAMSAR Wetlands</b>			
15	Conservation Council WA and 3 Anonymous	<p>The submitters raise matters relating to the concern for Matters of National Environmental Significance (MNES) and RAMSAR wetlands (Wonnerup Estuary).</p> <p>Please advise whether consideration has been given to:</p> <ul style="list-style-type: none"> <li>• the potential impacts of 24 hour operations on the wetlands?</li> <li>• providing further opportunity for</li> </ul>	<p>The City of Busselton referred the Proposal to the Minister for Environment under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act). The referral (2016/7675) was advertised on 31 March 2016 and was determined as a non-controlled action under the EPBC Act on 26 July 2016. This means that the Proposal did not represent a significant impact on the Matters of National Environmental Significance.</p> <p>Consideration was given to the impact of 24 hour operations. The City of Busselton engaged Bamford Consulting Ecologists to</p>

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		<p>assessment and comments to be made on the research and risk assessment undertaken by Bamford Consulting?</p> <p>Refer to ANON-GMHC-JD4B-3, ANON-GMHC-JD3N-E, ANON-GMHC-JD4K-C and Sub 5 for further details.</p>	<p>undertake a literature review and assessment of the risk posed to waterbirds. The findings of Bamford Consulting Ecologists were provided as part of the EPBC referral and also considered as an ‘other environmental factor’ as part of this ERD.</p> <p>The City of Busselton does not propose to provide further opportunity for assessment and comments on the research and risk assessment undertaken by Bamford Consulting Ecologists as there has been opportunity for public comment provided both under the EPBC referral and this ERD.</p>
16	Civil Aviation Safety Authority (CASA)	<p>The submitter advises that the CoB, as the authorisation holder and operator of Busselton aerodrome, maintains a “Bird and Animal Hazard Management Plan”.</p> <p>Please provide further details on whether this plan is currently in effect and whether the plan will be reviewed and updated with consideration for the proposed changes to operations.</p> <p>Refer to ANON-GMHC-JD4A-2 for further details</p>	<p>The BMRA Wildlife Management Plan is an operational plan used to guide the onsite management of wildlife as defined by CASA (MOS 139, S10.14). The plan provides the framework by which bird and wildlife numbers are recorded, reported and where necessary managed to ensure the safety of aircraft operations and provide information to pilots and aircraft operators (Attachment 4).</p> <p>The plan is reviewed annually and considers all operational aspects, including the type or aircraft and frequency of operations at the time of review.</p>
<b>Terrestrial Fauna</b>			
17	4 x Anonymous	<p>The submitters raise concerns over the effect that the increased airplane activity (noise) will have on cattle and kangaroo populations.</p> <p>Please provide further discussion on what consideration has been given to:</p> <ul style="list-style-type: none"> <li>the potential impacts of the</li> </ul>	<p>The submissions provide only anecdotal evidence as to the impact of night time flights on cattle and dairy operations. The City, in its investigations, was not able to locate any scientific evidence that states that night time airport operations has detrimental effects on dairy farm operations. The City notes that around Australia larger airports with higher traffic volumes are located in the vicinity of livestock including Brisbane West Wellcamp and Melbourne Airport. The submission states that increases in aircraft activity, particularly</p>

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		<p>proposed night time operations on adjacent dairy farm operations, including animal behaviour, milk quality and overall productivity; and</p> <ul style="list-style-type: none"> <li>• safety issues relating to the disturbance of large mobs of kangaroos during night time aircraft operations.</li> </ul> <p>Refer to ANON-GMHC-JD4B-3, ANON-GMHC-JD4T-N, ANON-GMHC-JD48-S and ANON-GMHC-JD4F-7 for further details.</p>	<p>at night, will cause a severe public safety issue relating to movements of mobs of kangaroos. The City notes that all areas of the airport that are utilised by aircraft are enclosed by 1.8m high wildlife proof fencing and therefore kangaroos will not interfere with aircraft movements. The City of Busselton also notes that it has no control over kangaroos outside the airport site but has not received any advice that night flights will cause a public safety issue and it is not aware of any other Australian airport that has had public safety issues caused by the airports proximity populations of kangaroos. If necessary the City will consult with the Department of Biodiversity, Conservation and Attractions.</p>
18	Anonymous	<p>The submitter raises concerns over the flora/fauna survey conducted by the CoB and suggests that it appears to omit several wildlife species that utilise the area. The submitter sites the Level 1 Fauna Survey conducted within nearby Cable Sands project area adjacent to the BMRA which identified additional species.</p> <p>Please advise whether any site specific fauna investigations have been undertaken within the proposed airport development area.</p> <p>Refer to ANON-GMHC-JD4T-N for further details</p>	<p>The Level 1 Flora and vegetation survey included investigations of flora and vegetation to indicate threatened species included under the following legislation;</p> <ul style="list-style-type: none"> <li>- Environmental Protection and Biodiversity Conservation Act (1999); and</li> <li>- Wildlife Conservation Act (1950).</li> </ul> <p>With regard to the Level 1 Fauna Survey completed for the Cable Sands mining area, the survey report found that out of a total 14 species of conservation significance identified as either using or potentially using the Cable Sands mine site, only 4 (Western Ring-tail Possum, Baudin’s Cockatoo, Carnaby’s Cockatoo and Forest red-tailed Cockatoo) were identified as potentially being impacted by the project. The City of Busselton in its Level 1 Flora and vegetation survey considered the habitat (flora) associated with all the above four identified fauna species.</p>
<b>Consultation</b>			
19	3 x Anonymous	<p>The submitter contends that the CoB and associated Airport Advisory Committee has not been open, honest or accountable and has rejected community requests for the CoB to provide additional information to the</p>	<ol style="list-style-type: none"> <li>1. The En Route Supplement Australia (ERSA) for BMRA is publically available from Airservices Australia at: <a href="https://www.airservicesaustralia.com">https://www.airservicesaustralia.com</a></li> <li>2. The City of Busselton has been open and transparent throughout</li> </ol>

		<p>public. The submitter contends that the CoB consultation process has not provided residents with an appropriate avenue to voice their concerns, nor to have these concerns taken into account.</p> <p>Please provide response to the following matters raised:</p> <ol style="list-style-type: none"> <li>1. Is the CoB willing to provide all details of the En Route Supplement Australia (ESRA) for Busselton Airport to enquiring community members?</li> <li>2. How has the CoB taken ongoing concerns of residents into consideration during the development of this proposal?</li> </ol> <p>•Refer to ANON-GMHC-JD4K-C, Sub 11 and Sub 5 for further details.</p>	<p>all of the public consultation processes and has sought public submissions, comments and/or feedback. The City has provided a number of mechanisms for the community to do this including;</p> <ul style="list-style-type: none"> <li>- Council and Airport Advisory Committee meetings are open, public meetings</li> <li>- BMRA Consultative Group</li> <li>- “Your Say” (an online dedicated engagement portal),</li> <li>- community comment page on the BMRA dedicated website; and</li> <li>- hard copy feedback forms at all public consultation meetings.</li> </ul> <p>Throughout the public consultation process the City has listened and considered all feedback provided and responded to community concerns in revising the proposed NMP (2017) to include a cap of five night flights per week between the hours of 0000hrs-0600hrs. This revision was based entirely on feedback received with regards to what protection would be in place to ensure that the proposed night flights would not increase from the number of night movements projected for the proposal.</p> <p>Further the City has responded to the Communities concerns surrounding existing flight paths and has liaised with the existing charter operator to implement noise reduction procedures. The City also offers a response to specific comments raised in the submission:</p> <p>The submitter refers to the public consultation process completed for the proposed updates to the NMP in 2016. The NMP (2016) was advertised for public comment for 21 days between 14 March and 1 April 2016. All submissions were reviewed/responded to and presented to the Council for consideration at its 9 March 2016 meeting. The agenda, reports and minutes from this meeting are available on the City’s website</p>
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			<p>for public viewing. The tabulated form of the submissions included in the Council report was in some instances summarized where comments unrelated to the NMP were not responded to.</p> <p>The submitter also refers to a “motion” that was raised at the BMRA Consultative Group Meeting on 3 October 2016; “the Committee (in light of the EPA request for more information) undertake a comprehensive community consultation schedule engaging ALL interested parties including ratepayers prior to any further progression of the project”, The Terms Of Reference, which was agreed to by all, was for the Committee members to provide the conduit to the Community including;</p> <ul style="list-style-type: none"> <li>- represent their community at the Consultative Group (raise question, requests for information); and</li> <li>- distribute information back to their respective communities.</li> </ul> <p>The Terms of Reference for the Committee does not extend to the Committee partaking in a community consultation program.</p>
<b>Other</b>			
20	Anonymous	<p>The submitter raises concerns over the recent approval of the Cristal Mining sand extraction proposal which has strict restrictions regarding the hours of operation placed on it by the CoB, however, the airport proposal has the potential to impact far more residences and the CoB is not giving due regard to curfews on airport operations.</p> <p>Please provide further discussion as to why curfews were considered for the Mining application but are not for the airport?</p> <p>Refer to ANON-GMHC-JD4P-H for further</p>	<p>It is understood that the submission relates to Cristal Mining’s ‘Wonnerup South’ operations on Lot 100 Sues Road / Bussell Highway / Wonnerup South Road. It should be noted that because this is a ‘pre-1890’ title, the minerals are not owned by the Crown, and they are therefore not subject of the Mining Act 1978 and not subject to the exemption from local government planning schemes provided for in Section 120 of that Act. As such, unlike the majority of mining activity in WA, local government development approval was required.</p> <p>The Wonnerup South mine is classified as ‘industrial and utility premises’ in the Environmental Protection (Noise) Regulations 1997. Specifically, Schedule 1, Part A, clause 4 of the Regulations identify; “A mine within the meaning of the Mines Safety and Inspection Act</p>

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		<p>details.</p>	<p>1994”; as being subject of the Regulations. Unless exemptions have been granted, a noise limit of 35dB(A) applies at the nearest sensitive premises, during the most sensitive times (i.e. 10pm-7am, Sundays and public holidays).</p> <p>Accordingly, having considered noise impact assessment and management plans provided with the application, the City applied hours of operation conditions to ensure compliance with the noise standards set out in the Regulations.</p> <p>Further the Environmental Protection (Noise) Regulations 1997; Regulation 3(1) (c) identifies the following; “noise emissions from trains or aircraft” not being subject to the Act. Noise from trains and aircraft are both quantitatively different to noise from mining and other industrial operations. With the mining operations noise can be more or less continuous or consistent, whereas with aircraft and train noise, and many other kinds of transport noise, it is not. Noise exposure is usually for short periods only, of 3-4 minutes duration. In the case of the proposals for Busselton, this would only occur up to five times per week during the most noise sensitive times of the day.</p>
21	Anonymous	<p>The submitter raises concern over the increased airport operations restricting future land use and development on their properties.</p> <p>How will the CoB propose to manage future land use development within areas impacted by the proposed increased airport operation?</p> <p>Refer to Sub 10 for further details.</p>	<p>The premise of the submission appears to be that in the absence of the Airport, residential or rural-residential development might be supported in areas (surrounding the Airport) where it is not currently supported. That premise is not correct.</p> <p>The City of Busselton in addressing future land use planning, in particular rural and residential development, has the following frameworks to guide potential development;</p> <ul style="list-style-type: none"> <li>- South West Planning &amp; Infrastructure Framework – adopted by WAPC;</li> <li>- Draft City of Busselton Local planning Strategy</li> </ul> <p>Further, once the environmental review process is complete, the City will initiate an amendment to the City’s Town Planning Scheme (TPS) to include revised statutory ‘buffer’ controls, in the form of a Special</p>

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			Control Area (identified as the Airport Protection Zone in the current TPS). As an amendment to the City’s town planning scheme, this will be subject to separate community consultation and EPA assessment requirements, before final decisions will be made by the City, WAPC and Minister for Planning.
22	Busselton Chamber of Commerce and Industry  Dunsborough Yallingup Chamber of Commerce and Industry	The submitters advise that they support the proposal and consider that the proposal will contribute to the financial contribution and broader economic development of the South West region will result.  Refer to ANON-GMHC-JD47-R for further details	Noted.
23	47 x Anonymous (proforma)	The submitters register their support for the proposed modifications to the BMRA for the following reasons: <ul style="list-style-type: none"> <li>• The development of the airport will allow direct flights from the east coast which will contribute to economic and social benefits of the South West.</li> <li>• Night time flights are required to test and develop the demand for routes from the Eastern States.</li> <li>• The CoB has proven itself effective and responsible of the airport through its management of potential environmental impacts to local wildlife and use of buffers and noise limits.</li> </ul> Refer to ANON-GMHC-JDD1-, ANON-GMHC-JD3C-3, ANON- GMHC-JD3H-8, ANON-GMHC-JD3U-N, ANON-GMHC-JD3Z-T, ANON-	Noted. The City of Busselton emphasises that the City has proven itself an effective and responsible operator of the airport through use of buffers and noise limits and its management of potential environmental impacts to local wildlife.

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		<p>GMHC-JD3V-P, ANON-GMHC-JD3W-Q, ANON-GMHC- JD3J-A, ANON-GMHC-JD3Q-H, ANON-GMHC-JD32-J, ANON- GMHC-JD35-N, ANON-GMHC-JDDM-X, ANON-GMHC-JDD9-A, ANON-GMHC-JDDR-3, ANON-GMHC- Jddb-K, ANON- GMHC-JDDA-J, ANON- GMHC-JDDK-V, ANON-GMHC-JDD8-9, ANON- GMHC-JDDT-5, ANON-GMHC-JDD3-4, ANON- GMHC- JDD7-8, ANON-GMHC-JDDX-9, ANON-GMHC-JDDP-1, ANON- GMHC-JDDY-A, ANON-GMHC-JDD4-5, ANON-GMHC-JDDF- Q, ANON-GMHC-JDDD-N, ANON-GMHC- JDDC-M, ANON- GMHC-JDDQ-2, ANON- GMHC-JDD6-7, ANON-GMHC-JDDH- S, ANON-GMHC-JDD1-2, ANON-GMHC-JDDE-P, ANON- GMHC-JDDZ-B, ANON-GMHC-JDDV-7, ANON-GMHC-JDDW- 8, ANON-GMHC-JDDJ- U, ANON-GMHC-JDD2-3, ANON- GMHC- JD4M-E, Sub 7, Sub 8, Sub 9, Sub 14, ANON- GMHC- JD36-P, ANON-GMHC-JD31-H, ANON-GMHC-JD3E-5 and Sub 16.</p>	
24	7 x Anonymous	<p>The submitters contend that the current airport operations cause no interruption to their current lifestyle and consider an international airport would be a great addition to the South West and contribute to tourism. The submitters also note that the proposed additional flights falls below the Commonwealth threshold considered significant, and that the airport will continue to operate under a management framework including a revised NMP.</p>	Noted.

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		Refer to Sub 4, Sub 2, ANON-GMHC-JDDN-Y, ANON-GMHC- JDDS-4, ANON-GMHC-JD3S-K, ANON-GMHC-JD3A-1 and ANON-GMHC-JD39-S for further details	
25	Department of Transport (DoT)	The DoT advises that they have a strong interest in the future development and outcomes of the BMRA.  Refer to Sub 3 for further details.	Noted.
26	Anonymous	The submitter raises matters with particular reference to Lot 75 of the Provence Estate and the potential for future development of this location for residential purposes. The submitter concludes that the property is outside the Airport Protection Area, and as such is suitable for future residential development.  Refer to ANON-GMHC-JD4R-K for further details	This application is subject to the City of Busselton’s planning process.