



## MASTERS OF OUR INDUSTRY

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Mr Scott Stone  
General Manager Aviation Environment  
Department of Infrastructure and Transport  
GPO Box 594  
CANBERRA CITY ACT 2600

[safeguarding@infrastructure.gov.au](mailto:safeguarding@infrastructure.gov.au)

Dear Mr Stone

### **DRAFT NATIONAL AIRPORTS SAFEGUARDING FRAMEWORK**

Master Builders writes to express its concerns over the Federal Government's proposed *Draft National Airports Safeguarding Framework*.

The Master Builders Association of Victoria ("Master Builders") is the peak body representing employers in the building and construction industry in Victoria. Our membership consists of more than 8000 builders, subcontractors, manufacturers and suppliers. More than 50 per cent of our members are small businesses with an annual turnover of \$2 million or less.

The Victorian building and construction industry is facing an uncertain future as costs rise, demand weakens and the global economy softens. As the industry prepares for the challenges ahead including the price on carbon and the dismantling of the Australian Building and Construction Commission, this proposal will further undermine Victorian building sector jobs.

The draft framework has failed to provide any evidence, or be supported by any detailed research, that supports the need to expand anti-development zones around airports. The Australian Noise Exposure Forecast (ANEF) system currently in place was based on science and defined in Australian Standards. The alternative measures put forward in your proposal, however, appear to be defined subjectively rather than be based on hard fact or data. This lack of empirical evidence could therefore see boundaries arbitrarily changed at will in the future, providing little certainty for future planning in our city and for building requirements in affected suburbs.

It also sees the Commonwealth extend its planning control boundaries, meaning that burdens of dealing with overly complicated state and local planning laws by local builders is further exacerbated by creating another layer of bureaucracy. This is particularly concerning as the policy fails to identify any significant problems with the current planning system in place for many years around our airports.

Melbourne is a city battling to deal with a lack of affordable housing. Public policy makers should respect the great Australian dream to buy and own a house. But this policy will not help combat rising house prices. An analysis by MacroPlanDimasi

estimates that around Melbourne Airport, some 10,400 potential homes will not be built as a result of the proposed framework. This restriction will only add pressure to house prices by restricting available development opportunities and starve Melbourne of potential housing supply, particularly as this policy will impact airports in Essendon and Moorabbin in addition to the major airport at Tullamarine.

Communities in Melbourne that are a significant distance from Melbourne Airport will be unnecessarily burdened by this framework. Maps that form part of the proposed framework show significant areas in Melbourne's growing northern and western suburbs will be impacted by your proposals. Distant suburbs such as West Footscray, Taylors Lake, Diggers Rest and Mickleham will be covered by the restrictions proposed in your framework but there are no clear benefits this policy will deliver for these communities.

Residents living in these suburbs will also be disadvantaged by this policy as their houses will be identified as being noise-affected. At the same time, no justification has been put forward that details why different communities should be treated differently under the proposed models put forward.

For these reasons, Master Builders is firmly of the view that the proposed framework be abandoned.

Yours sincerely



*per* Brian Welch  
Executive Director