

COMBINED GOVERNMENT AGENCY COMMENTS – Peregrine Helicopter Landing Facility PER

During the consultation period the PER was circulated to a number of SA and Commonwealth agencies that were deemed relevant. Please find below a table providing issues raised that require points of clarification and/or additional information to be provided in the Response Document in order to enable a comprehensive assessment of the proposal, prior to formal decision.

#	Topic / Issue	PER section / reference	Description of issue raised	Requirement for applicant in Response Document	A/B/C
Environmental Protection Authority					
1.	Noise assessment		<p>Two methods of noise assessment have been utilised by the EPA to determine compliance with the General Environmental Duty (GED), contained in the <i>Guidelines for the use of the Environment Protection (Noise) Policy 2007</i>.</p> <p>1. Noise Policy Guidelines Regarding the Guidelines, the EPA notes the proposal is anticipated to:</p> <ul style="list-style-type: none"> • be “very loud” in an absolute and relative sense and considered by the EPA to be highly intrusive to a wide extent; • be well above average background noise levels and consistent with the highest instantaneous maximum noise level provided by any short-term activity; and • affect conversations, reading, studying or watching television for a significant number of people, however would not interfere with sleeping as the proposal is not contemplating usage at night or very early hours of the morning. <p>The EPA identified the noise of the proposed helicopters is expected to include multiple noise characteristics, including significant tonal noise, highly dominant impulsive and modulating characteristics. On this basis, the EPA concluded the following:</p> <ul style="list-style-type: none"> • the local area is not considered to have similar noise generating activities nor would the duration, level of noise 	<p>Provide commentary how the proposed helicopter landing facility addresses the General Environmental Duty identified in the <i>Guidelines for the use of the Environment Protection (Noise) Policy 2007</i>.</p> <p>Provide justification and mitigation measures where the proposal is not able to comply with the General Environmental Duty.</p>	A

			<p>and character of the activity be expected or typical for the area;</p> <ul style="list-style-type: none"> • the spatial impact and intrusive nature of helicopter noise is commonly recognised; • it is generally accepted that helicopter noise should specifically avoid being introduced to areas close to noise sensitive land uses; • a reasonable person is not likely to tolerate the introduction of noise from the proposal into the predominately residential area, regardless of the level of use; • each proposed flight is considered by the EPA to be of high intensity and intermittent frequency, the intermittence of the noise would further contribute to the annoyance experienced; • it is improbable and impractical to reduce the noise impact of the proposal, unless the noise source is changed or additional limitations are placed on the level of use; • the predominate community view would be that helicopter noise is incompatible with the predominantly residential use in the area; and • the proposal would cause unreasonable noise impacts over a wide area, despite the proposal to limit operations. <p>In summary, the EPA indicated that the proposal does not comply with the GED.</p> <p>2. Victorian EPA Noise Guidelines and Australian Standards The EPA noted the Guidelines identify the following:</p> <ul style="list-style-type: none"> • LAeq should not exceed 55dB for a residence; • LAmax should not exceed 82dB at nearest residence; and • a minimum 150 or 200m separation distance between helicopter landing facility and residence (based on helicopter weight) is recommended. <p>In comparison, the EPA note the following:</p>		
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			<ul style="list-style-type: none"> the maximum predicted noise levels for each proposed helicopter type range between 85dB-95dB; and this noise reaches hundreds of residences. <p>In summary, the proposal would not meet the Victorian Guidelines for noise levels and separation distances.</p> <p>On this basis, the proposal does not comply with the GED and EPA recommends that the proposed helicopter landing facility should not be approved.</p>		
2.	Indoor noise levels		<p>The EPA highlighted the <i>Australian Standard – AS 2021:2015 Acoustics – Aircraft noise intrusion</i> identifies acceptable indoor noise levels, being between 50-60dB(A) for dwellings and schools. The EPA has concluded the helicopter facility would not meet the indoor noise levels in AS 2021:2015 at many properties based on the Sonus Noise report.</p>	<p>Provide commentary regarding the proposal’s ability to meet the Australian Standard AS 2021:2015 <i>Acoustics – Aircraft noise intrusion</i> indoor noise levels.</p> <p>Quantify the number of residences impacted based on the Australian Standard for indoor noise levels and provide evidence through spatial mapping.</p>	A
3.	Impacted locality assumptions		<p>The PER identified information which determined the locality impacted by the helicopter noise. The EPA considered that the area potentially impacted by the take-off / landing component of the facility would extend for a radius of 2.3km from the landing facility.</p> <p>In determining the locality impacted by noise generated by helicopter activities, the EPA identified <i>Eco-Action Kangaroo Island Inc v Kangaroo Island Council & Others [2012]</i> as being a relevant piece of case law, which considered that once a helicopter had reached cruising height, the impact on the ground under it is the same as it would be regardless of where the helicopter had taken off from. The EPA noted that the Australian</p>	<p>Reinvestigate take-off/ landing impacts of the proposal for a radius of 2.3km from the helicopter landing facility and provide evidence through mapping.</p>	A

			Noise Exposure Forecasts (ANEF) charts are generated with the same approach.		
4.	Comparison of noise impacts to other noise sources		<p>The EPA noted that the direct comparison to other noise, such as road traffic noise is problematic given the unique character, duration and wide extent of helicopter noise.</p> <p>The EPA noted that communities will find the introduction of new or unfamiliar noise into an established residential area more noticeable and impacting, in comparison to typical noise sources such as roads.</p>	Provide a more appropriate comparison for the noise impacts, including evidence or modelling to demonstrate the different experiences of noise eg. on Portrush Road, in dwelling etc.	A
5.	Aircraft type, flight paths and noise contours		The EPA notes that a helicopter can potentially have multiple flight tracks based on operating parameters and local conditions. The maximum predicted noise contours provided are useful in assessing noise impacts in close proximity, however the EPA highlights that they do not provide a holistic picture of the potential noise impacts due to limited spatial extent and modelling one flight path.	Model additional flight paths based on likelihood of use.	B
6.	Air Quality		<p>The EPA reviewed the Air Quality Impact Assessment and is generally satisfied that the inherent conservatism built into the air dispersion modelling and impact assessment is appropriate, specifically the NO_x as NO₂ assumptions.</p> <p>The EPA note further information on the air dispersion modelling parameters has been provided, specifically regarding the 'Low Wind' option. This information appears to be a scientifically defensible best estimate.</p> <p>The EPA confirm that based on the modelling, the predicted air quality impacts associated with the proposal will comply with the Air Quality Policy.</p>	For noting	C
7.	Avgas usage		The EPA notes that the PER has clarified that Avgas will not be used at any stage without assessment for lead dispersion and EPA approval.	For noting	C

Government Architect					
8.	Ground floor plane		The variation includes ground floor plane amendments as a result of site survey work undertaken, however plans were not submitted. Provision of plans will allow a review of the new entrance stair and ramp configuration and ensure universal access and the arrival experience is appropriate.	Submit ground floor plans which identify the amendments made to the external stairs and ramp at the main entry. A complete and consistent set of plans should be provided.	A
9.	Overall building height		The Government Architect noted the overall building height remains as per the previous authorisation at 34.85m, however site level survey work has confirmed the RL of the building levels are 1.35m above the RL of the previously authorised building levels.	Confirm the impact of this RL change. Specifically, detail how the relationship of the building and podium levels and overlooking of the rear Bowen Street properties has been changed.	A
10.	Rooftop infrastructure		The Government Architect notes the proposal results in a number of elements that contribute to visual clutter at the rooftop which is inconsistent with the original design intent. To review the visual impact of the rooftop infrastructure, the height of any infrastructure within the cooling tower set down area is to be provided.	Confirm the height of any infrastructure within the cooling tower set down area. Provide commentary which demonstrates how the proposal delivers the original design intent. Consider how the proposal may be designed or screened to reduce the visual clutter on the rooftop.	B
11.	External materials		Ensure simplicity of form and material to minimise visual bulk, consistent with the original design intent.	Confirm the proposed atrium soffit lining treatment and the material composition of the upper fascia of the atrium.	B.

Heritage South Australia					
12.	Local heritage places and contributory items		Heritage SA noted that the submitted Heritage Impact Assessment addresses State heritage places and their context, however does not address local heritage places or contributory items.	Review local heritage places and contributory items and provide commentary how the proposal relates to these items.	A
13.	State heritage places	5.2.2	Heritage SA concurs with the statements within the Heritage Impact Assessment that the variation to propose a helicopter landing facility is not considered to impact on the nearby State heritage places given the changes will generally not be visible from the context of the heritage places.	For noting	C
14.	<i>Heritage Places Act 1993</i>		The following requirements of the <i>Heritage Places Act 1993</i> are applicable: a) If an archaeological artefact believed to be of heritage significance is encountered during excavation works, disturbance in the vicinity shall cease and the SA Heritage Council shall be notified. b) Where it is known in advance (or there is reasonable cause to suspect) that significant archaeological artefacts may be encountered, a permit is required prior to commencing excavation works. For further information, contact the Department for Environment and Water.	For noting	C
15.	<i>Aboriginal Heritage Act 1988</i>		The following requirements of the <i>Aboriginal Heritage Act 1988</i> are applicable: If Aboriginal sites, objects or remains are discovered during excavation works, the Aboriginal Heritage Branch of the Aboriginal Affairs and Reconciliation Division of the Department of the Premier and Cabinet (as delegate of the Minister) should be notified under Section 20 of the <i>Aboriginal Heritage Act 1988</i> .	For noting	C
CASA					
16.			No comment on the PER		

Air Services Australia					
17.			No comment on the PER		
DPTI Transport					
18.			No comment on the PER		
Department for Environment and Water					
19.			No comment on the PER		