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Department of Infrastructure, Transport,
Regional Development, Communications
and the Arts

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Via email:

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Submission to the Aviation Green Paper

Thank you for providing Inner West Council with the opportunity to comment on the Aviation Green Paper.

Due to the timeframe for the review, this submission has been prepared at officer level and has not been formally adopted by Council.

Inner West Council has focused this submission on aspects of the Green Paper which affect Local Government and local communities, particularly those near airports. To assist in its consideration, the submission is presented in chapter order of the Green Paper, with the corresponding questions provided as the starting point for each chapter response. Where a general comment has been deemed more appropriate than a series of individual answers, the questions have been excluded

Chapter 2 – Likely future directions out to 2050

What emphasis should the Australian Government place on these trends to help guide the future of the sector? Are there any other trends the Australian Government could add?

It is considered that many of the key *demand side and supply side drivers* are beyond the extent of local government expertise or influence, however the sustainability drivers align well with Local, State and Federal policies to achieve decarbonization, ultimately aiming at net zero.

In this respect Council encourages the Federal Government and aviation industry to examine opportunities to prioritise sustainability in relation to:

- decarbonization of the industry;
- fleet renewal (for both air-based and land-based vehicles);
- fostering of increased use of public transport for the workforce;
- fostering of increased use of public transport for passengers;
- opportunities to create net zero aviation facilities.

Chapter 3 – Airlines, airports and passengers – competition, consumer protection and disability access settings

In this respect Council's primary expertise relates to the provision of disability access, and rather than addressing each individual question relating to disability access, Council emphasises that DDA Compliance should be considered an absolute minimum, rather than maximum, level of provision.

Council proposes that it is essential that *inclusivity*, rather than merely *accessibility*, should be considered in all aspects of design.

As an example, while the use of air bridges is common at city airports many regional airports continue to use flight stairs with the adjunct of a lift. It is contended that use of the lift, after a special request is made, provides accessibility but reduces the inclusivity through the need to request this service. Consequently, it is suggested that more inclusive systems of access should be examined for regional airports, possibly in the form of permanent use of ramps for all passengers.

Additionally, in the preparation of Disability Access Facilitation Plans, it is requested that inclusion be addressed rather than merely accessibility for all design aspects.

Chapter 5 – Maximising aviation's contribution to net zero

It is essential that all aspects of the aviation industry should contribute to achieving net zero; from the fuels being used, the materials employed in connection of both aircraft and facilities, to the modes available to travel to and from aviation facilities.

Council commends the Department's commitment to achieving net zero by 2050 in aviation, and suggests that any associated road maps or action plans should include, but not be limited to, consideration of:

- Emissions from aviation fuel for all flights, including international flights (Noting that it is considered that a global problem with genuinely tackling net zero is related to the absence of consideration of emissions from aviation fuel, used in international flights, in carbon foot printing. Further, as these are international flights, this carbon is not assigned to any country, in international climate foot printing, though it generates significant emissions). Consequently, Council requests that this be redressed and that a mechanism be established to either assign the carbon to the departure country or to split it between both the departure and arrival countries.
- Materials used in the construction of airports and aviation facilities. This should include all materials, particularly hardstand areas, including heat island effect of these areas;
- Carbon associated with modes of travel to and from airports for both passengers and employees, as well as land-based transport within the airside precinct;
- Lighting, heating and all other aspects of environmental maintenance within and adjacent to airport precincts.

Additionally, it is essential that the various road maps and action plans be adaptable and capable of incorporating new technologies as they become available.

Chapter 6 – Airport development planning processes and consultation mechanisms

Do you have comments on how the operation and effectiveness of the Noise Complaints Information Service could be improved?

The operations and effectiveness of the Noise Complaints Information Service could be improved by demonstrating what actions have been carried out in response to each complaint. An option to register for more relevant, or detailed, information should be available to the public when responding to complaints.

Furthermore, the ANO should sit as an independent body rather than reporting to the AirServices Australia Board. This reduces the illusion of misconduct when dealing with complaints by the AirServices Board and provides security for the Community.

How could the Australian Noise Exposure Forecast, and use of the ANEF in Government planning processes, be improved?

The ANEF contours provided for planning are often too vague to be accurately applied to land use planning. Smaller contour ranges should be used, as well as education programs for both planners and the Community, on the implications of the different contours.

What are appropriate, modern noise metrics that should be used to communicate aircraft noise impacts?

It is generally considered that the ANEF is an outdated mechanism to assess aircraft noise impacts and that a comprehensive review should be conducted examining world's best practise in noise impact assessment.

Additionally, in establishing an appropriate mechanism for assessing aircraft noise impacts it is essential to consider the expectations of the contemporary communities.

How can governments better communicate with potential purchasers of properties which will be affected by aircraft noise in the future?

Under the current legislation, planning certificates only mention the ANEF if the property is affected by an ANEF contour of 25 or more. It creates the assumption that properties under ANEF contours below 25 would not be affected by aircraft noise, however experience has shown that residents outside the ANEF 25 contour regularly feel impacted by aircraft noise.

It is recommended that ANEF should be reviewed and, until such a time as a new standard developed, the ANEF should be stated in planning certificates for all properties.

How can new and different types of noise impacts from projected growth in drone use best be managed?

Noise impacts from projected growth in drone use will impact the Community and should have a time restriction/curfew. Furthermore, visual privacy will be an issue in areas such as residential neighbourhoods and recreational areas. A minimum height, and lateral distance from, requirement should be implemented to ensure that privacy in residential areas are protected.

Do these processes provide sufficient opportunity for impacts on the community to be identified and taken into account? How can they be improved?

There needs to be better promotion for Airservices Australia as the platform for all noise complaints to be lodged. Community issues need to be lodged in one platform to be properly addressed and captured to accurately depict the impacts on the community.

What can be done to proactively mitigate noise impacts by better informing residents and land-use planners?

While it is understood that land use planning is the most effective way to mitigate aviation noise impacts, an area that is developed such as Inner West LGA cannot change the land use of the area based on changing flight paths. The land uses of developed areas need to be considered when designing new flight paths.

Noise impacts are conveyed through ANEF, which lacks details on frequencies, times and sound levels of noise impacts from aviation. A modern, more effective noise metric such as the Equivalent Sound Level should be implemented instead.

Furthermore, changes to flight paths are not adequately communicated to residents by Airservices Australia, with details including the period which changes will occur.

What else can airlines and airports do to support better management of aircraft noise?

As much as practicable, airlines and airports should have consistent flight paths and aircraft spacing, (i.e., at the same intervals and flying over waterways and industrial areas). Should flight paths operate over residential areas, the noise impact load should be shared equitably through noise sharing arrangements that are agreed by the Community and industry and enforced by AirServices Australia.

What can be done to facilitate increased adoption and implementation of the National Airports Safeguarding Framework principles for land planning to optimise land-use activity and reduce community impacts?

It is suggested that further development of the National Airport Safeguarding Framework principles should be carried out in close consultation with Councils and Communities adjacent to airports. Additionally, opportunities should be explored to examine site-specific variations based on each Council, Community and airport's needs.

Could governance arrangements for the Aircraft Noise Ombudsman be improved to provide greater independence, including publishing its findings and reports?

Governance arrangements for the Aircraft Noise Ombudsman should be improved by being established as an independent body operating outside of Airservices Australia jurisdiction. It is understood that the original decision to have ANO report to Airservices Australia was because the roles were closely aligned, and to ease the sharing of information. There are, however, several ways to mitigate this including having a cloud-based platform shared between Airservices

Australia and the ANO or having liaison officers who can readily communicate between the two organisations.

Council agrees that the findings and reports should be publicly available to allow Community members, particularly those who have issued complaints, to understand how their concerns and complaints have been addressed.

Are there opportunities to improve transparency by publishing information about other decisions made by CASA, Airservices or airports around flight paths, and how aircraft approach and depart airports?

Yes, information should be published along with rationale behind the decision-making processes around flight paths alignments. This would allow the Community to be better informed and permit people to be well-informed prior to purchasing a property. This would subsequently build the social license for aviation whenever the Community is affected by noise impacts from flight paths alterations.

How can the flight path design principles be improved?

Council supports safety being the main priority. It requests that wherever Community concerns are raised, considerations should be given to these, particularly in relation to overflight which relates public health.

Flight path design should also take advantage of new and emerging air navigation technologies to minimize overflight impacts, most particularly aircraft noise, without jeopardising safety.

How can the existing consultation framework be improved to facilitate efficient planning and development, while preventing environmental harm and ensuring continued access for aviation users?

Consultation on preliminary flight path and airspace design should have enough information for all stakeholders to provide appropriate feedback.

Furthermore, as PIRs often require 12-18 months to complete, it is crucial for consultation throughout the initial design of flight paths with relevant and affected stakeholders, including Local Government and the Community, to ensure that concerns are addressed prior to the introduction of new flight paths.

Are CACGs working for the community? What are good aspects, and what can be improved?

The beneficial aspects of CACGs include the ability for encourage engagement between airport operators, residents, local authorities, airport users and community members of CACGs, however their structure means that only members are able to raise concerns for consideration.

Council 's preference is the existing model of community engagement represented by the Sydney Airport Community Forum (SACF). SACF is the only Community Forum for aviation in Australia and works closely with airport operators on the Long-Term Operating Plan by advising the Minister for

Infrastructures and Transport, Sydney Airport Corporation and aviation authorities on the abatement of aircraft noise and related environmental issues for any Australian airport.

How could the Australian Government improve regulation to facilitate efficient planning and development while preventing environmental harm and protecting airports for aviation use?

It is considered essential that airport planning and development be carried out in close consultation with local, and State, government to ensure efficient, fully integrated planning is carried out in and around airports.

Is a monetary threshold still an appropriate mechanism for determining a 'major airport development' requiring an MDP? What other significance tests could the Australian Government consider?

Additionally, it is considered that the existing mechanism could include a threshold for the number and type of flights, as this has an impact on development surrounding the airport.

Do current master planning processes adequately account for climate risks and if not, how could they be improved?

Based on the master planning process is used by Sydney Airport, it is considered that climate risk assessment and analysis is being addressed. This does not, however, mean that the current process should not be the subject of ongoing review, with such review including adaptation and adjustment to approaches based on world's best practise. It is also essential that resilience and changing Community values be considered during master planning.

Do the current master planning processes support all airport users, including general aviation?

Council's experience with Sydney Airport master planning has not indicated any site-specific commitment to general aviation, however it is noted that consideration of general aviation in major international airports may not be appropriate provided that it is addressed at a regional level. It is requested that general aviation is addressed on this regional scale, however the closure of Schofields and Hoxton Park airports has placed additional pressure on Bankstown Airport as Sydney's sole general aviation airport.

In order to ensure a consistency and predictability of approach, it is suggested that broad-based discussion should be entered into between the industry, and all levels of government, to determine the appropriateness, or otherwise, of general aviation facilities within urban areas.

Chapter 8 – Fit-for-purpose agencies and regulations

What should the Australian Government consider in adopting technology to fully utilise airspace and ensure access for different parts of the sector?

The Australian Government should consider all aspects of new aviation technology, with emphasis on safety, noise, amenity, privacy sustainability. It is essential that all impacts are managed when adopting new technologies to fully utilise airspace and ensure access for different parts of the aviation industry.

Noise impacts, particularly at night, should be managed through a maximum noise level mechanism and flight regime. In the case of Sydney Airport all existing noise controls, including its curfew, caps and noise sharing regime should be maintained.

Additionally, with new technology, airlines should investigate newer aircraft types which produces lower noise levels to mitigate noise impacts.

Privacy and amenity for the Community should also be prioritised when considering new technology such as drones.

In the air cargo environment, how could industry and Government better work together to leverage advances in technology as well as industry investments in infrastructure and technology to streamline movement of cargo?

It is important to consider the implications air cargo will have on the wider transport network. The Inner West is a thoroughfare for a large proportion of freight in Greater Sydney, noting that most land freight is transported on road. Should air cargo increase, additional freight railways need to be considered as a mode of transporting freight as it does not increase demand on the road network.

Council considers it essential that the aviation industry, particularly air freight, not be considered in isolation and that overall transportation network planning include integration of land and air movement.

Chapter 9 – Emerging aviation technologies

Council generally considers that the economics behind the industry supporting emerging aviation technology is beyond its current level of expertise, however it provides the following comments for consideration in regard to the technologies themselves;

- The implications for Advanced Air Mobility (AAM) are far reaching, and while much of the green paper considers noise associated with these devices and technologies it is also essential that privacy and general amenity be considered;
- There should be extensive consultation with both Councils and Communities regarding the impacts of AAM, with the possibility of developing accepted corridors for operation supported by AAM hubs in suitable locations. This should then be supported by associated first and last mile delivery networks, ideally using land-based active transport;
- The possibility should be examined to identify areas for “sandbox trials” of emerging aviation technologies in areas with minimal Community impact;
- It is essential to consider the impacts of emerging aviation technologies on the environment including fauna. In doing such it should be noted that studies have shown that there is potential for smaller “drones” to be erroneously identified as predators by both air and land bound fauna;
- It is also essential that extensive consultation be carried out while developing frameworks such as Australia’s Future Airspace Framework and the Remotely Piloted Aircraft Systems and Advanced Air Mobility Strategic Regulatory Roadmap to ensure combined Community and industry ownership, while at the same time creating a level of certainty and knowledge for both;

- In utilising emerging aviation technologies, priority should be given to the exploration of opportunities to minimise noise and privacy impacts while maintaining or ideally enhancing safety;
- Concern is expressed that management systems for emerging technologies should not be self-regulating, as they have far reaching implications, which may not be fully considered if industry based self-regulation is permitted.

Thank you again for the opportunity provided to Inner West Council to comment on the Aviation Green Paper. Should you have any questions regarding this submission please contact Council's Coordinator of Strategic Transport Planning, Ken Welsh, via; ken.welsh@innerwest.nsw.gov.au

Your sincerely,



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