



***Town and Country Planning Association  
Incorporated***

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Registration no. A0031095J

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30 November 2023

Aviation White Paper Branch  
Domestic Aviation & Reform Division  
Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
GPO Box 594  
CANBERRA ACT 2601

Email: [aviationgreenpaper@infrastructure.gov.au](mailto:aviationgreenpaper@infrastructure.gov.au)

Dear Sir/Madam

***Aviation Green Paper: Towards 2050  
Submission by the Town and Country Planning Association Inc.***

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The T CPA is a non-profit public organisation established in Victoria in 1914 and is independent of any party political organisation.

Please find on the following pages the T CPA's submission in response to the *Aviation Green Paper: Towards 2050* released on 7 September 2023.

The T CPA appreciates the opportunity to be part of the Aviation White Paper process and, in particular, being able to participate in the virtual roundtable discussions held in October 2023.

Please contact me directly if you have any further queries.

Yours sincerely

Peter Hill  
Honorary Secretary  
Town and Country Planning Association Inc.  
Ph: 0402 132 633  
Email: [secretary@tcpa.org.au](mailto:secretary@tcpa.org.au)

Att: Town & Country Planning Association Inc., *Submission to the Aviation White Paper: Terms of Reference*, (10 March 2023)



## **About the TCPA**

Established in Victoria in 1914, the Town and Country Planning Association Inc. (TCPA) is a politically independent, not-for-profit association incorporated in 1994 and is independent of any party political organisation. Its members and supporters represent a wide cross-section of land use and transport planning expertise and interests.

The TCPA is fortunate in that its committee includes three retirees who, between them, have many decades of experience in airport planning and policy and others who have worked in the broader context of integrated land use and transport planning.

To learn more about the TCPA visit: <https://tcpa.org.au/about-us/>

## **Considerations in preparing this submission**

In addition to those documents noted in the TCPA submission to the *Aviation White Paper: Terms of Reference*, 10 March 2023, (TCPA Submission to ToRs), the TCPA has also considered the following:

- A general review of submissions to the Terms of Reference.
- Participation in virtual roundtable discussions:
  - Airports and Airport development – 18 October 2023
  - Regional and Remote Aviation – 19 October 2023

**The TCPA congratulates** the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) in conducting these virtual workshops. The insights gained were most valuable and the TCPA appreciated the opportunity to participate.

- Infrastructure Partnerships Australia, *Building Trust: Social Licence for Infrastructure*, 2021<sup>1</sup>,
- Productivity Commission, Plan to identify planning and zoning reforms, Information Paper, 2021<sup>2</sup>

## **Matters addressed in TCPA Submission to ToRs**

The TCPA submission to the *Aviation White Paper: Terms of Reference* focussed on emerging issues of particular interest to the TPCA which had appeared to be omitted, namely:

- Need to update the 2008 Aviation White Paper
- Airport planning processes
- Regionalisation
- Events of national significance for the transport sector
- Achieving net zero carbon missions

This submission will not reiterate the matters raised in March 2023, but will draw on them as needed in responding to the Green Paper.

### **The TCPA:**

- **believes that all comments it made remain relevant to the development of the Aviation White Paper; and**
- **urges the Department to continue to consider those matters.**

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<sup>1</sup> Available via [https://infrastructure.org.au/wp-content/uploads/2021/07/IPA\\_Building\\_Trust\\_Social\\_License\\_for\\_Infrastructure\\_FINAL.pdf](https://infrastructure.org.au/wp-content/uploads/2021/07/IPA_Building_Trust_Social_License_for_Infrastructure_FINAL.pdf)

<sup>2</sup> Available via <https://www.pc.gov.au/research/completed/planning-zoning-reforms>



## **Issues that should be addressed in the White Paper**

TCPA believes the following matters should be addressed in developing the Aviation White Paper. Item 1 is a new matter. Items 2 – 5 were previously addressed in the TCPA Submission to the ToRs and have been further updated in this submission.

### **1. Monitoring and Review processes need to address social and environmental licence, not just economic performance**

This matter was not canvassed in the TCPA Submission to the ToRs, but has emerged during its own consultations and in response to matters raised at the roundtable sessions.

Airports and, indeed, the broader aviation sector have social and environmental licences to operate. Governments have social and environmental licences to govern. Currently, neither are doing it very well at all.

#### **DEFINITION**

*“A social licence to operate is an informal social contract between an organisation and the community. It is defined by the community trusting that an organisation will act in line with the community’s expectations, beyond what is required by legal or regulatory frameworks.” (IPA, 2021, p6)*

The complexities of Commonwealth ownership of major airports and their long term lease to private organisations has been coming to the fore in recent years. The Australian Government is both aviation regulator and airport landlord.

Maintaining “Social Licence to Operate” has been and remains one of the key emerging issues right across the transport sector and is increasingly being discussed at Board levels, particularly by infrastructure fund providers. Its scope and implications for governments is something that the Green Paper does not seem to fully recognise.

The importance of social licence in the infrastructure sector is due to its direct impacts on communities and end-users. Infrastructure faces challenges from both industry-specific requirements and from shifting societal values and expectations in the broader community. Maintaining the community’s on-going acceptance of an organisation’s conduct is key for the sector.

Infrastructure Partnerships Australia published *Building Trust: Social Licence for Infrastructure* in 2021, where it explores the rapidly emerging thinking in this area and the need to be accountable to the broader community beyond what is required by regulation/legislation.

Social licence is linked to other established corporate frameworks, such as Corporate Social Responsibility (CSR) and Environmental, Social and Governance (ESG) frameworks. These are well-established frameworks that organisations use to guide their relationships and projects with key stakeholders. However, often they do not holistically consider an organisation’s reliance on community engagement and the interests of all affected stakeholders. While there are many worthwhile activities undertaken by airports and the aviation industry to the benefit of community group and environmental outcomes, these are often most focused on communities within the vicinity of an airport.

Issues like conflicts of interest; unclear roles and responsibilities; poor governance; policy and planning flaws; and lack of transparency are common and after much fence sitting now require addressing and monitoring.

The Green Paper discusses current Commonwealth airport monitoring and review processes addressing airlines, airports and passengers, in particular, competition, consumer and disability access. However, the current annual monitoring and periodic reviews undertaken by the Australian Competition and Consumer Commission (ACCC) and the Productivity Commission (PC), respectively, have focussed on the expectations of passengers, airlines and other airport users. They have not considered the social and environmental expectations of the broader community.



This may require a specialised urban systems Commission that could work with both the ACCC and the PC. The PC has found reviews of urban systems challenging. In its 2021 Information Paper, *Plan to identify planning and zoning reforms*, the PC was unable to draw specific conclusions, mostly due to the complexity of urban systems across Australia. It was prepared as a guide to policy makers in the States and Territories, and at best highlighted the key issues and possible directions for reform.

The TCPA Submission to ToRs, in addressing *Achieving net zero carbon emissions*, proposed:

- Achieving net zero carbon emissions must be a priority for the transport sector.
- Air travel should not be promoted at the expense of other more sustainable modes of travel such as long-distance rail.
- Interchange facilities at airport terminals to encourage public transport transfers.
- Discouraging an industry that deals in cut-price fares that encourage excessive cheap tourism – ultimately a cost on the environment and the community.

These factors are measurable and are examples of matters that could be reported in a broader monitoring and review regime.

Whether it be for the Australian Government or the industry sector, developing and maintaining social licence is crucial. It is now important to establish a monitoring regime to address the social and environmental expectations of the broader community, as well as the largely economic interests of airlines, airports and passengers.

**TCPA submits that:**

- **The White Paper includes the establishment of a monitoring regime to address the social and environmental expectations of the broader community, as well as the largely economic interests of airlines, airports and passengers; and**
- **This requirement should be reflected in a revised *Airports Act 1996*.**

## **2. Need for a national approach to properly integrated land use and transport**

The Green Paper did not address aviation's role as part of the national transport network.

Aviation is a key element of Australia's broader transport networks, connecting cities, regions and remote areas. Ideally, those connections would be included in a national plan integrating transport and land use planning. No one mode can deliver the connectivity needs of Australian communities.

The state and territory governments of Australia are legitimate and key stakeholders in protecting the amenity and health of their communities in hand with supporting future airport growth.

**TCPA submits that, in the absence of a national integrated land use and transport strategy, the White Paper discusses the roles of airports and aviation as part of a national transport network, in connecting key centres and in complementing other modes.**

## **3. Airport planning processes**

### *Airport planning and state and territory governments*

The Green Paper provides a comprehensive summary of the roles of the Australian Government and its agencies, but seems to over-simplify the complementary roles of state, territory, and local governments and their regulatory regimes.

- A participant at one of the Airports and Airport Development roundtables noted inconsistency of environmental regulations on and off federally leased airports.

**TCPA submits that the White Paper should have a more thorough assessment of the state, territory and local governments' roles and measures to address any inconsistency in regulatory regimes.**



### ***Airports and other transport projects***

By not addressing aviation's role as part of the national transport network, the Green Paper did not address the need for the Australian government, its agencies and airport owners/operators to be vigilant in monitoring the interfaces and impacts of major transport infrastructure investments, on airport and aviation operations, such as the Suburban Rail Loop stabling and service facility near Moorabbin Airport.

Equally, state, territory and local governments need to engage with airport owners and operators in planning transport investments, to ensure that risks noted in the TCPA submission to the ToRs can be identified, assessed and mitigated or avoided.

The Green Paper's discussion on risk mostly centres on national security issues and aircraft operations. It does not address the risks to airport and aircraft operations of other infrastructure, transport or otherwise.

#### **TCPA submits that:**

- **The White Paper should have a more thorough discussion of risks to airport and aircraft operations that might eventuate from nearby significant infrastructure investment.**

### ***Approval processes for federally leased airports are not consistent with those for other major transport initiatives around Australia***

TCPA previously noted the Airports Act does not allow for a mandatory independent review process for airport developments, despite the success of the collaborative approach for the *Melbourne Airport Strategy Environmental Impact Statement* between 1989-1990 (a Commonwealth assessment and approval now referred to in the VPP).

Major transport projects in Victoria comparable with Airport Master Plans, Airport Environment Strategies and Major Development Plans have been subject to planning and environmental assessment independent review processes. To the Victorian transport projects previously listed, TCPA notes the same processes have applied to:

- Mount Hotham Airport
- Bendigo Airport New Runway
- Ballarat Airport Runway Extension
- Various planning scheme amendments to protect hospital-based emergency services helipads.
- Introduction of Airport Environs Overlays into the VPP and various planning scheme amendments to protect Victorian airports and airbases.
- Melbourne Airport Environs Strategy Plan, where the approval in both Houses of the Victorian Parliament was required under the *Planning and Environment Act 1987* (VIC)

After 27 years, now is the time for the *Airports Act 1996* be reviewed and amended to provide for the state, territory and local governments to be party to the joint preparation of Airport Master Plans and Airport Environment Strategies. Currently, these governments only become involved once a proposal has been worked up. Much earlier engagement is required.

Like the Victorian projects listed above, significant airport development projects, such as the Major Development Plans for additional runways at Brisbane and Melbourne Airports, deserve a similar collaborative approach to preparation and assessment and the benefits of an independent review.

**TCPA submits that, given the role of the state, territory and local governments in airport development and protection, the White Paper recommend the *Airports Act 1996* be reviewed and amended to provide for:**

- **State, territory and local governments to be party to the joint preparation of Airport Master Plans, Airport Environment Strategies and Major Development Plans**
- **Independent review of proposed Airport Master Plans, Airport Environment Strategies and Major Development Plans consistent with public consultation and review processes required in the states and territories.**



### ***National Airport Safeguarding Framework and emerging Health issues***

State and territory governments were and remain key participants in the development of the agreed NASF and its incorporation in their planning systems.

TCPA previously noted work of the Victorian Transport Action Group (VTAG), particularly its paper, *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (28 March 2022)<sup>3</sup> that discussed the 2018 findings of various studies undertaken by the World Health Organisation (WHO) identifying personal health impacts beyond sleep disturbance and general distraction used in the current Australian Noise Exposure Forecast (ANEF) System for modelling future aircraft noise impacts.

It noted that WHO has proposed critical noise levels (dB) that are lower than currently used to address transport related noise. VTAG noted that these are currently not addressed in the *National Airports Safeguarding Framework (NASF)* or its *Guideline A – Measures for Managing Impacts of Aircraft Noise* and recommended that they should now be addressed.

These matters have not been addressed in the Green Paper. TCPA acknowledges that Departmental officers did acknowledge in the roundtable discussions that this was a gap.

Given the increased research on broader health impacts due to the transport sector more generally, the TCPA believes that WHO findings should now be included in NASF and its guidelines.

#### **TCPA submits that:**

- **The Aviation White Paper recommends new health related aircraft noise metrics need to be prepared by the Australian Government, based on the WHO recommendations, and be enshrined in the *Airports Act 1996*, *Airservices Australia ANEF* approvals and in the *National Airports Safeguarding Framework (NASF)* so as to be applicable to all airports in Australia.**

#### **4. Events of national significance for the transport sector.**

While Victoria has withdrawn from hosting the 2026 Commonwealth Games,

Brisbane will host the 2032 Olympic Games. Such events will have implications for the national transport networks generally, as well as for the aviation sector.

The Green Paper does not discuss aviation's role in events of national cultural significance. The White Paper should address aviation's role with the wider transport sector in supporting such events.

#### **TCPA submits that:**

- **The Aviation White Paper addresses aviation's role with the wider transport sector in supporting events of national cultural significance.**

#### **5. Regionalisation**

The TCPA Submission to the ToRs drew attention to a discussion paper prepared in partnership with the Rail Futures Institute Inc., *Rail as a Catalyst for Regional Growth*<sup>4</sup>, January 2022, which discussed the need for long term visions for regional growth and the opportunities for the transport network, particularly rail.

The final report, *GROWING VICTORIA'S REGIONS: Rail the Catalyst for Regional Growth* (the Plan), to be released in early 2024, will propose a target for regional population growth and vital passenger rail planning staged over the next 40 years.

This may be of interest to the Department and a copy will be forwarded on release.

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<sup>3</sup> The report now available via the VTAG Facebook page at <https://www.facebook.com/victoriantransportactiongroup>; or via direct link at [https://drive.google.com/file/d/1\\_aBOxWmpPWqlz8lbUjxmicwMhkFOXFAO/view?usp=sharing](https://drive.google.com/file/d/1_aBOxWmpPWqlz8lbUjxmicwMhkFOXFAO/view?usp=sharing)

<sup>4</sup> Full Discussion Paper and a summary are available at <https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/>



END



## **Attachment**

### **Town & Country Planning Association Inc. – Submission to the Aviation White Paper: Terms of Reference**

Dated and submitted on 10 March 2023.

Department of Infrastructure, Transport, Regional Development, Communications and the Arts  
reference: Submission 78

- [awptor2023-submission-a78-town-and-country-planning-association.pdf](#)

#### **Updates:**

- Yellow highlighted text in this attachment either correct minor typological errors or provide clarity as a result of subsequent queries.
- Victorian Transport Action Group (VTAG), *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (28 March 2022) is now available via:
  - the VTAG Facebook page at <https://www.facebook.com/victoriantransportactiongroup> ; or
  - Direct link at [https://drive.google.com/file/d/1\\_aBOxWmpPWqlz8lbUjxmicwMhkFOXFAO/view?usp=sharing](https://drive.google.com/file/d/1_aBOxWmpPWqlz8lbUjxmicwMhkFOXFAO/view?usp=sharing)





## **About the TCPA**

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The TCPA is fortunate in that its committee includes three retirees who, between them, have around many decades of experience in airport planning and policy and others who have worked in the broader context of integrated land use and transport planning.

To learn more about the TCPA visit: <https://tcpa.org.au/about-us/>

## **Considerations in preparing this submission**

In addition to the *Aviation White Paper: Terms of Reference* (Terms of Reference), the TCPA has also considered the following:

- *National Aviation Policy White Paper – Flight Path to the Future* (Australian Government, December 2009)  
[https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/publications/files/Aviation\\_White\\_Paper\\_final.pdf](https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/publications/files/Aviation_White_Paper_final.pdf)
- Airports Act 1996
- TCPA submission to the House of Representatives Standing Committee on Infrastructure, Transport and Cities  
*Inquiry into the Australian Government's role in the development of cities in 2017*  
<https://tcpa.org.au/wp-content/uploads/2014/09/Submission-to-SCITC-Aust-Government-role-in-cities-TCPA.pdf>
- TCPA submission to the *Suburban Rail Link Project Environment Effects Statement and Planning Scheme Amendment* (16 December 2021).  
<https://tcpa.org.au/wp-content/uploads/2022/07/TCPA-Submission-to-SRL-EES-and-letter.pdf>  
<https://tcpa.org.au/wp-content/uploads/2022/07/TCPA-Presentation-to-SRL-IAC-Speaking-notes-2-May-2022-FINAL-as-delivered.pdf>
- TCPA submission to the *Melbourne Airport Master Plan 2022 and Third Runway MDP*  
<https://tcpa.org.au/wp-content/uploads/2023/03/TCPA-Submission-to-Melbourne-Airport-Master-Plan-and-3rd-runway-and-letter-Draft.pdf>
- TCPA reports and papers on regional growth – available at  
<https://tcpa.org.au/publications/tcpa-reports/>
  - *A Decentralisation Strategy for Australia*
  - *Rail as a Catalyst for Regional Growth*
  - *High Speed Rail for Regional Growth*
- Victorian Transport Action Group (VTAG), *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (28 March 2022) (See separate PDF attachment)

## **Key messages of this submission**

This submission does not propose to address all detail of the Terms of Reference, but rather focus on any emerging issues of particular interest to the **TCPA** which they currently appear to omit, namely:

- Need to update the 2008 Aviation White Paper
- Airport planning processes
- Regionalisation
- Events of national significance for the transport sector
- Achieving net zero carbon missions



## **Terms of Reference**

The key messages in this submission do not neatly fit into each matter to outlined in the Terms of Reference. As with most matters related to integrated land use and transport planning, there is often overlap.

For convenience of referencing, the matters will be referred to in accordance with the following numbering.

- A. Aviation’s role in economic development, trade and the visitor economy – general, domestic, regional and international aviation;**
- B. How to maximise the aviation sector’s contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;**
- C. Changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;**
- D. Airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation;**
- E. How to support and regenerate Australia’s general aviation sector;**
- F. Future industry workforce skills and training requirements;**
- G. Appropriate consumer protections and access to services;**
- H. Maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;**
- I. The role of airlines and airports in supporting regional economies; and**
- J. Other significant issues raised during the consultation process.**

The key messages addressed in this submission affect items A, B, C, D, I and J, above.

That said the TCPA is concerned at the use of the term “fit-for-purpose” in item H. Australia has a reputation for excellence in aviation safety etc. The use of terms such as “fit-for-purpose” in a national strategy or policy settings can imply a watering down of service quality and, therefore, national reputation.

## **Emerging issues**

### **6. Need to update the 2008 Aviation White Paper**

#### ***Need for a national approach to properly integrated land use and transport planning***

Over the past decade the TCPA, like many transport and planning associations, has advocated for a national approach to integrated land use/population distribution and transport strategy. The TCPA believes that, without such an approach, transport mode-based strategies become almost meaningless.

There has been an increasing focus on regional development policy and regional alliances evolving over the last 15 years.

It will be important that the next national aviation strategy demonstrates that it understands the geography of these alliances and regions – regional cities now recognise the importance of being connected to each other (regardless of state borders) as well as to their nearest capital cities.

The Brisbane – Melbourne region, focus of the High Speed Rail initiative, is one where mode-specific transport polices need to recognise the role of aviation and other transport modes in contributing to **population distribution** as well as economic development, trade and visitor markets.



### ***Airport planning and state and territory governments***

The Victorian Government has taken significant steps to safeguard airports and ensure that planning for and around airports considers the potential safety and amenity impacts on surrounding communities, integration with Victoria's land based transport network and protection of airport operations.

### ***Health issues***

Health impacts of transport operations were not subject of detailed spatial research even 25 years ago. It has taken the research of academics like Distinguished Professor Billie Giles-Corti (RMIT University) working with geography researchers to start to apply a spatial dimension to chronic diseases and their causal links with transport related air and noise emissions.

In recognition of her work, in 2020 the TCPA awarded its Sir James Barrett Memorial Award medal to Distinguished Professor Giles-Corti.

<https://tcpa.org.au/sir-james-barrett-memorial-award-for-2020-presented-to-distinguished-professor-billie-giles-corti/>

## **7. Airport planning processes**

### ***Airport Master Planning***

Melbourne's airports (including Melbourne, Avalon, Essendon and Moorabbin) and Victoria's RAAF Bases (Point Cook and East Sale) are important infrastructure assets, vital to the city's social connectivity and economic prosperity.

Victoria's many regional airports (including Ballarat, Bendigo, Hamilton, Latrobe Valley, Mildura, Mt Hotham and Portland) also make significant social and economic contributions to their regions and the State. Most of these airports have master plans and have ongoing airport infrastructure investment programs.

### ***National Airport Safeguarding Framework (NASF) and aircraft noise impacts***

Some TCPA members are also members of VTAG and have drawn our attention to a recent paper, *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (VTAG, 28 March 2022).

The paper outlines the 2018 findings of various studies undertaken by the World Health Organisation (WHO) identifying personal health impacts beyond sleep disturbance and general distraction used in the current Australian Noise Exposure Forecast (ANEF) System for modelling future aircraft noise impacts.

The newly identified impacts include noise distress and delay in cognitive development and the WHO has proposed critical noise levels (dB) that are lower than currently used to address transport related noise. VTAG notes that these are currently not addressed in the *National Airports Safeguarding Framework* (NASF) or its *Guideline A – Measures for Managing Impacts of Aircraft Noise* and recommends that they should now be addressed.

### ***Airports and other transport projects***

TCPA submission to the *Suburban Rail Link Project Environment Effects Statement and Planning Scheme Amendment* identified, amongst other matters, the conflict of the SRL stabling yard with crucial points in the flight paths (arrivals, departures and training circuits) at Moorabbin Airport. In this regard the submission addressed

- Provisions of Clause 18.02-7S – Airports and airfields of the Victoria Planning Provisions (VPP), particularly as it refers to Moorabbin Airport operations;
- The *National Airports Safeguarding Framework* and its associated Guidelines A – I;
- The Moorabbin Airport Master Plan (2015) and the Preliminary Draft Moorabbin Airport Master Plan (2021); and
- Potential risk to the Stabling Facility resulting from an aircraft incident.



The TCPA noted that, while aircraft noise and protection of airspace were addressed, the EES had not addressed all aspects of the NASF, in particular its Principles and Guidelines C (wildlife strike), E (pilot lighting distraction) and G (Communication, navigation and surveillance)

The recent release of both the *Melbourne Airport Environs Safeguarding Standing Advisory Committee Part B Final Report* (November 2021) and the associated State Government Response, *Safeguarding Victoria's airports* (April 2022) reinforces the need for developments and airports to address NASF when considering developments on and in the vicinity of airports.

While mercifully rare, there have been three incidents in the vicinity of the stabling facility site since 2010 that should now trigger consideration of NASF *Guideline I: Managing the Risk in Public Safety Areas at the Ends of Runways* in both the SRL East EES and Moorabbin Airport's current master planning process.

- **June 2021** The pilot was seriously injured when his aircraft had been conducting circuit operations at Moorabbin Airport and collided with terrain approximately 1 km north of the airport at Heatherton – the Heatherton Sands site immediately to the north of the proposed facility.
- **June 2019** Two men walked away with minor injuries after their plane crashed into the Capital Golf Course in Heatherton, which is just to the north of the airport and south of the proposed stabling yard.
- **April 2010** 72-year-old pilot was trying to land his Piper Warrior craft when the plane clipped trees and landed at the Capital Golf Club course.

This created the opportunity for the SRL East project to undertake the extra consultations that the TCPA recommended in its submission and to ensure that it can fully address NASF – if acted upon quickly. Whether those consultations have occurred is not clear to the TCPA.

However, the TCPA remains concerned that no representative of the SRL proponents, the state transport or planning departments or local council had account for the interaction between these significant transport facilities. Neither Moorabbin Airport nor federal aviation agencies made submissions to the EES. Given that NASF places obligations on all levels of government and airport to remain vigilant and that failed in this instance, the National Aviation White Paper will need to review the operation of NASF and its associated intergovernmental arrangements.

***Approval processes for federally leased airports are not consistent with those for other major transport initiatives around Australia***

Except for Avalon Airport, federally leased airports in Victoria are subject to the *Airports Act 1996* and its associated approval processes. Avalon Airport and all other Victorian airports are subject to state environment and planning legislation and processes. Likewise, the proposed airport to Melbourne's south east as proposed in *Plan Melbourne 2017-2050* will also be subject to state processes, including independent review.

The Airports Act does not allow for a mandatory independent review process for airport developments, despite the success of the approach for the *Melbourne Airport Strategy Environmental Impact Statement* between 1989-1990 (a Commonwealth assessment and approval now referred to in the VPP).

This is a somewhat unique arrangement when compared to planning for other major transport infrastructure investments of state and national significance. Each of the following transport projects in Victoria has been subject to planning and environmental assessment independent review processes:

- Western Highway Duplication (various sections)
- North East Link
- Suburban Rail Loop Stage 1
- Port of Melbourne – Webb Dock EES
- Port of Melbourne – Channel Deepening Project (twice)



- Westgate Tunnel Project
- Melbourne Airport Rail Link (twice so far)

In none of the above cases was the project proponent expected to perform the role of independent reviewer that federally leased airports appear to play under the Airports Act 1996.

***A collaborative approach is needed***

The state and territory governments of Australia are legitimate and key stakeholders in protecting the amenity and health of their communities in hand with supporting future airport growth. State and territory governments were and remain key participants in the development of the agreed NASF and its incorporation in their planning systems, including in Victoria’s case, the *Victoria Planning Provisions* (VPP).

Like the Victorian projects listed above, significant airport development projects, such as the additional runways at Brisbane and Melbourne Airports, deserve a similar collaborative approach to preparation and assessment of these strategic plans and projects and the benefits of an independent review.

## **8. Regionalisation**

The TCPA partnered with the Rail Futures Institute Inc. and, in January 2022, released a discussion paper, *Rail as a Catalyst for Regional Growth*. The discussion paper considered the need to boost population growth and support social and economic development in Victoria’s regions:

- Potential population scenarios which might rebalance the relative sizes of regional and metropolitan populations, noting that even prior to COVID there was a trend to regional living and remote working which the pandemic has accelerated; and
- The roles of rail transport (including emerging faster rail systems) and other transport modes (including air).

While relating to rail networks, there are parallels to the aviation networks. Eight key topics emerged from the Discussion Paper, which will be addressed in the Final Report to be released in coming weeks:

- Leadership is needed to make the changes to boost regional growth
- Stronger planning guidelines and controls will be required
- Regional cities should be the locations for regional growth
- Scenarios for regional growth
- Urban growth in peri-urban areas<sup>5</sup>
- Gaps in regional passenger services
- The regional rail network is an under-utilised asset
- Regional city railway stations/precincts as transport hubs.

The 2022 discussion paper and a summary are available at the TCPA website – <https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/>

## **9. Events of national significance for the transport sector**

The State of Victoria will be host for the 2026 Commonwealth Games, with a strong focus on regional Victoria. In a Commonwealth Games first, Victoria 2026 will introduce a new multi-city model bringing global sport to four regional hubs: Geelong, Bendigo, Ballarat and Gippsland. Each hub will have its own athlete village, and together they will deliver a 16-sport program in world-class regional sporting venues.

Similarly, Brisbane will host the 2032 Olympic Games. Both events will have implications for the national transport networks generally as well as for the aviation sector.

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<sup>5</sup> Peri-urban refers to “within 100 km od Melbourne’s CBD”.



## **10. Achieving net zero carbon missions**

Achieving net zero carbon emissions has to be a priority for the transport sector. It will be a challenge for the aviation sector and aircraft manufacturers, but like other modes the possibilities for alternative fuels are developing rapidly.

Pricing or policies should not be configured to promote air travel at the expense of other more sustainable modes of travel such as long-distance rail and should provide interchange facilities at airport terminals that encourage public transport transfers.

Certainly, Australia should not be going in the direction of an industry that deals in cut-price fares that encourage excessive cheap tourism that is ultimately a cost on the environment and the community.

### **TCPA wishes to be involved**

This White Paper is of considerable interest to the TCPA. Its submission identifies areas of interest that the TCPA would like to discuss further and present at the proposed roundtables proposed in March and would anticipate making submissions responding to the Green Paper later in 2023.

END