

Aviation Green Paper – Towards 2050

Comments from City of Salisbury, South Australia

Thank you for the opportunity to submit on the Aviation Green Paper – Towards 2050.

This submission has been prepared and submitted prior to an endorsement of Council, and is based on its known positions on aviation matters. Should any endorsement change elements of this commentary, you will be updated.

The City of Salisbury is a suburban Council in metropolitan Adelaide, South Australia and is home to Parafield Airport, a significant general aviation and flight training airport under the management of Adelaide Airport Ltd, and the RAAF Base Edinburgh which is a Defence super-base.

The City of Salisbury has been aware of airport related matters for many years due to its consideration of the benefits and impacts on the local communities of these two significant airports within its boundary. Council is a member of the Parafield Airport Consultative Committee and the Adelaide and Parafield Airports Planning Coordination Forum. Council has also had regular dealings with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (and its predecessors) through its Aviation and Airports Division. Council is a member of the Defence Teaming Centre, and has often liaised with Defence SA, and the Department of Defence – Estate Planning Land Planning and Regulation Infrastructure Division.

I can advise that Council has generally supported Aviation and planning reform in order to have an improved outcome for the community. This has been achieved through the adoption of various planning policies and NASAF Guidelines, including Public Safety Zones in its policy deliberations as opportunities arose.

However, it must be recognised by the Federal Government, NASAG, and State Planning Ministers that the incremental imposition of the various Guidelines and regulations for the protection of airports have a significant and increasing impact on the communities around airports, and are multiplied in the City of Salisbury due to the presence within the City of two significant airports. This is having an impact on the economic potential of a significant number of properties and businesses, and is not being considered in the context of a balance between community and airport needs. The burden of protecting airport operations must be shared across the community and airports as the impost on individuals would be inequitable.

In response to the Green Paper, I can indicate that:

Sector Overview

No comment

Future Directions out to 2050

Supports

Airlines, airports and passengers- competition, consumer protection and disability access settings

Supports

Regional and remote aviation services

Supports

Maximising aviation's contribution to net zero

The City of Salisbury strongly supports the initiatives to reduce emissions by the aviation industry, through such means as the preparation of a Transport and Infrastructure Net Zero Roadmap, use of Sustainable Aviation Fuel and the establishment of a domestic SAF industry, and the Jet Zero Council forum, the continuing research and deployment of hydrogen and electric powered aircraft in a safe progression. This particularly applies to Parafield Airport which has the major component of its activity being flight training operations. Federal support and subsidies for such aircraft should be considered and introduced which would also contribute to the reduction of airplane noise for the residents affected by the flight paths.

Airport development planning processes and consultation mechanisms

The City of Salisbury considers that the Federal government should undertake another major Socio - Acoustic study to assess the impact of aircraft noise on residential communities in Australia. Many parameters and considerations have changed since the last study was done in 1979. The continued use of the 1979 results as a basis of the acceptable level Australian Noise Exposure Forecast contours for residential and other activities and the development of the Australian Standard 2021 must be reviewed. Council supports the additional investigations into alternate methods of explaining and describing the noise events, but considers that after the passage of almost 45 years, it is time to reconsider the basis of the noise acceptability frameworks.

The complex information used to show noise impacts requires a simplified explanation of the framework and ANEF contour creation, and the understanding that noise events will still occur outside the contours, and that the proposed additional use of the N Series maps must more readily show the differences of noise presentation to the public, and the reasons why and their impacts on the residents. The requirement to use the ANEF contours as the planning tool is not necessarily helpful to the community, particularly when each Master Plan prepared by the Airports results in a shift of contours. There is much time and effort spent by the Local Authority in dealing with the public as a result, and local access to information should be made easier to access and understand.

A recent meeting between Parafield Airport and the Mayor, Chief Executive and senior staff was held at the request of the airport in order to meet its obligations in preparing the next Master Plan. It was appreciated that the airport informed the Council and explained the differences in its new modelling, but very disappointing to realise that it was information presentation, and not a consultation exercise which could incorporate further discussions on what might be achieved by both parties to improve the situation.

The use of Ultimate Capacity modelling for an airport is considered to better inform the community and Council and does not result in changing parameters for building limitations and acoustic treatments to meet the required construction standards. The existing methodology of using the changing ANEF for each Masterplan iteration results in community confusion and frustration, and adds to the construction burden for newly affected areas. It must be realised that retrofit requirements are more expensive than new builds, and contributes to the regulatory burden of Council in this instance for a matter created by the Federal Government.

The City of Salisbury is concerned with ensuring housing affordability for its community, and the increased construction costs associated with acoustic compliance only adds to the difficulty in housing accessibility.

In South Australia, the noise contours are inserted into the state-wide planning scheme and mapping, and requires construction compliance.

The City of Salisbury experience with the community consultation mechanisms has been acceptable, but considers improvements can be made to how the comments have been dealt with by the airports in the proposals. Likewise, the membership of the Consultative Committee could be considered for a wider membership than currently exists.

Improved and heightened awareness of indigenous interest in on-airport lands should occur through the Airport Master Plan process, and a Reconciliation Action Plan should be made part of the Master Plans for airports.

General Aviation

The most significant impact on the community of Salisbury is the Flight Training schools due to the number of flight movements compared to other aircraft movements. Continued and increased use of Flight Simulators is to be promoted.

There must be a consideration of a maximum usage of flight training movements of an airport in regards to the impact on the community. The continued transition to electric aircraft for flight training must be promoted.

Fit for purpose agencies and regulations

Supports.

Emerging aviation technologies

Supports and encourages the commitment to grow local aircraft manufacturing capability. The City of Salisbury has a strong background in manufacturing and business in its area, and has the Polaris Business Development Centre located in Technology Park, adjacent to Parafield Airport. It provides business support and programs, promotes innovation and local network creation and engagement and collaboration across industry, government, education providers and research organisations and can assist at the local level in skill identification and training.

Future industry workforce

Supports the long-term approach to skills identification and training to recognise the new technologies.

International aviation

Supports.

Council invites the consideration of these comments into its preparation of the White Paper, and wishes you well in the deliberations.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

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