



# Aviation Green Paper 2023

Submission From

Community Aviation Consultation Group

Melbourne Airport

## About Melbourne Airport Community Aviation Consultation Group

Melbourne Airport's Community Aviation Consultation Group (CACGMA) comprises:

- Representatives from communities affected by aircraft operations
- Community members with specific interest and expertise in education, environment, urban and transport planning, and airport related businesses
- Local schools
- Regional Victoria
- Victorian Trades Hall Council
- Statutory officers from six municipal councils

In the past the focus of most CACGs has been on stakeholders close to airports. A 2021 report by the Aircraft Noise Ombudsman highlighted that such a limited focus did not provide a voice for the concerns of communities more distant from airports, but still directly affected by the human impact of flight paths. CACGMA has widened its membership to facilitate input from affected communities and local councils. We see merit in this being adopted as a broader principle.

CACGMA meetings are also attended by organisations who provide updates on their activities:

- Melbourne Airport
- Airservices Australia
- Victorian Department of Transport and Planning
- Department of Infrastructure, Transport, Regional Development, Communications and the Arts (DITRDCA).

CACGMA meets at least quarterly, with extra meetings held as required. The group is informed and engaged, with many members communicating outside formal meetings to share information and ideas.

## About this submission

CACGMA accepted DITRDCA's offer of an extra meeting on the Green Paper. Members have considered the content of the Green Paper and support the aim to update policy and direction.

This submission is prepared by and represents the views of CACGMA's community representatives, with local government members providing valuable feedback. We understand councils may be preparing submissions separately. CACGMA members with further thoughts and opinions may make individual submissions.

This submission covers two areas:

- Achieving balance between community and other interests
- Consultation.

### 1. Achieving balance

CACGMA acknowledges the important role of aviation and airports in community as a whole, particularly the amount of local employment and the wider economic benefits. Melbourne Airport has over 18,000 employees and provides economic opportunities to businesses across the state.

Since the last White Paper, however, community expectations around environmental impacts have changed. Including community as an integral part of the environment, impacts alongside those on the economic and physical environment include:

- Noise: as the Green Paper highlights, noise is an ongoing issue rarely addressed to community satisfaction. This is covered further in Section 2.
- Social: cumulative impacts, health impacts, and fostering inclusion
- Sustainability: human resilience along with addressing energy use and climate change.

Sitting alongside this is the need for commercial organisations to provide robust governance to prove they have social licence<sup>1</sup>.

CACGMA acknowledges the complexities of effecting change. We note:

- The Green Paper raises many good questions but no clarity about the responsibility for formulating the answers. In the past at least, much aviation policy seems to rely on airports or airlines to effect change – with no direct government involvement or monitoring.
- Many of the issues raised in the Green Paper will affect multiple government agencies across all three levels of jurisdiction, as well as commercial organisations, NGOs and communities. These groups often have conflicting priorities.

CACGMA does not see evidence in the current planning regime of capacity to measure and respond equitably to conflicting objectives and priorities.

### **Government’s role in providing leadership**

Noting the complexities outlined above, we believe that it is critical that policy is backed by:

- Implementation plans
- Incentives
- Guidelines
- Procedures
- Regulations
- Public reporting

Each of these should have clear timelines for delivery, and consequences for non-delivery.

## **2. Consultation**

### **Role of CACGs in community engagement**

Planning in the aviation sphere is a long process involving multiple public, private and community stakeholders. It can be difficult to engage the community over multi-layered and often intangible issues.

CACGs provide a stable group of informed and interested people to be involved over the long term, provide feedback to airports and government, and to reach out to the communities they represent.

An engaged CACG may be described as enabling and encouraging airports to be good neighbours in their immediate communities and beyond. This includes, but is not limited to: planning; environment, including noise and health; employment, including training; customer experience, including ground transport and terminal; and in Melbourne Airport’s case, as a gateway to Melbourne and Victoria.

CACGs provide an important, unique and effective two-way forum for airport management to engage with community representatives on a regular basis. The CACG structure enables airports to report on operations and developments and receive feedback and informed community input at all

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<sup>1</sup> There is a community expectation that this should also apply to Airservices Australia, although the commercial imperative for it doesn’t exist.

times, not just during project-based community engagement. Reports to CACGs from Airservices and the relevant state and federal planning and transport authorities are important in providing information on the context within which airports operate.

The representative structure of CACGs means communities and other representatives have an important and effective conduit to airport management. Issues and concerns can be aired face to face and (at least in the case of Melbourne) the airport commits to investigating and reporting back – with solutions or explanations. In turn, CACG representatives are an informed resource for the communities or bodies they represent.

The role and makeup of CACGs as outlined in the current DITRDCA guidelines may be seen as ‘flexible’. However there is little oversight, transparency or shared learnings from other airport experiences and improvements.

### **Community engagement**

Community engagement has improved over the last ten years, particularly at local and state government level. Unfortunately, the aviation sector lags in that it often retains the tendency to think consultation is *providing* information, not *gathering* or *responding* to it.

The interface between state and federal government planning is often opaque and not responsive to community expectations, or the role local government plays in those meeting those expectations and responding to associated policies. Examples include economic development and residential densification in the most appropriate locations, climate change goals, tree canopy targets, caring for the vulnerable. Reasons for this include the following:

- Because the primary focus tends to be on airports’ economic benefits, there are limited opportunities or incentives for airports to consider changes to their thinking in tackling broader issues impacting the community
- Advice from technical specialists tends to override environment and community advisory inputs. The White Paper should outline how the Australian Government will lead with policy and regulation to ensure airports engage better with Councils and the community.
- There is little sharing of decision making processes (such as multi-criteria analysis: weightings of community, environmental, commercial and other factors) and public reporting is limited and can be impenetrable.

### **Consultation on noise and health**

In recent times Airservices Australia has begun to adopt a more community centred approach to its attendance at CACGMA meetings, which has been very welcome. Unfortunately complaints to NCIS are still often met with defensive, system oriented and sometimes patronising responses.

We have not seen any input or engagement from Airservices’ Environment Branch. For example there is no apparent understanding or consideration of *qualitative* issues: the different perceptions of what is intolerable or irritating noise, either in volume or duration. Related to this is the fact that noise is considered as a single problem without the requirement to view it in the context of cumulative health and social impact issues.

The current expectation is for state planning schemes to provide the majority of noise management through identifying ‘protected’ areas over which aircraft take off and land, yet many residential properties are located under flight paths and are impacted by this noise. Additionally, the impacts of non-emergency helicopters on residential areas could be better managed.

There is an opportunity for the federal government to lead in this field, including:

- requiring that lower emission aircraft be rapidly be introduced, with a view to continued emissions reduction
- encouraging lower noise emitting aircraft to service airports which have 24/7 operations; and at airports where residential communities and schools are affected by daytime aircraft noise
- calling for clarity about why there are different responses to ameliorating noise impacts on different residential areas.

CACGMA appreciates this approach may take time to fully implement, but is critical to future airport operations.

### 3. Conclusion

In concluding, we have two main points.

#### 3.1

As noted in Section 1, we believe there must be legislative backing to achieve lasting changes in the aviation industry. The parliamentary description of a White Paper is:

‘a statement of government policy on a particular issue, presented to parliament as a subject for discussion, usually prior to or accompanying the introduction of a relevant bill’.<sup>2</sup>

Aviation policy must move beyond relying on airports or airlines to effect change. Aviation policy should require direct government involvement and monitoring.

The interface between state and federal government planning must be more transparent and responsive to community expectations. It should provide better recognition of competing state and local government policies in relation to land use and development in areas adjacent airports; and provide more focus on community needs.

Given the absence of timely industry actions to address noise and emission concerns of the community, government policy must set clear goals.

#### 3.2

CACGs continue to have an important role in providing meaningful two-way connections between airports and the community.

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<sup>2</sup>

[https://www.aph.gov.au/About\\_Parliament/Parliamentary\\_Departments/Parliamentary\\_Library/pubs/rp/rp2021/ExplainingParliamentaryTerms#\\_Toc46233620](https://www.aph.gov.au/About_Parliament/Parliamentary_Departments/Parliamentary_Library/pubs/rp/rp2021/ExplainingParliamentaryTerms#_Toc46233620) (from The Penguin Macquarie *Dictionary of Australian Politics*);