

# Aviation Green Paper Comments

## Peter Cromarty

### Aircraft Noise

The use of aircraft is crucial to the economy of Australia. The benefits of aircraft use pervade every area of human life and cannot be separated out. It is not reasonable for a person to say, "I do not fly on aircraft, therefore, I do not wish to hear (or even see) aircraft at any altitude." Just because a person doesn't fly, doesn't mean that person doesn't receive the benefits that aviation brings to society.

Here are some examples of the benefits of aircraft usage which may not be considered by those complaining about aircraft noise:

- Tourists coming to Australia spend money on hotels and B&Bs, cafés and restaurants, hire cars and tourist attractions. The demand from overseas visitors (and the non-flyer) drives the industry to provide a greater supply and variety of facilities, and employs many more people than would otherwise be the case, increasing the prosperity in area.
- Executives and staff of both Australian and non-Australian businesses need to travel by air to conduct their business especially if overseas. Thriving businesses contribute to an expanding economy.
- The presence of an airport or even a very small aerodrome, allows personal travel and communication to a much wider area than would otherwise be the case. This makes the region served by the airport or aerodrome more desirable and brings businesses and industry to the region. A diverse industrial and commercial environment in the region helps to secure prosperity for the region. Three examples:
  - Brisbane West Wellcamp Airport was built entirely with private money. It has many daily passenger services and a weekly B747 freighter direct to Hong Kong taking produce from the Darling Downs region to China.
  - Wagga Wagga council positively supports their airport which has encouraged aviation businesses to come to Wagga Wagga.
  - A mine at Mt Isa is about to close and potentially 1,200 people will be laid off which will have a very damaging effect on the economy of the town because it has not diversified its industrial base.
- Much of the world's oil is extracted from under the sea. The only way for crews to reach the oil rigs and production platforms in the sea is by air. Motor fuel would be more expensive than it already is if land-based fuel only was exploited.
- A person buys an item on-line. It arrives from anywhere in the world in a few days.
- In an accident on a road three hours' drive from the nearest hospital, who would say, "Yes, I'll wait six hours for the ambulance to come and take me to hospital. Please don't send the helicopter which could get me to hospital in 1 hour"? Nobody.

Aircraft noise has an environmental impact that should be controlled better. As a former member of the National Airports Safeguarding Advisory Group (NASAG) I can report that the group is of very little value in land use planning because the State, Territory and Local councils are responsible for land use planning and the NASAG is run by a Federal Department which has no power over them. The National Airports Safeguarding Framework (NASF) provides only guidance and, therefore, is of value only when those with the accountability for land use planning read it (if they have even heard of it) and decide to comply with its advice.

As noted in the Green Paper, there is a general “lack of awareness of NASF by town planners”. In my experience there was a general lack of will by town planners even to consider the guidance. The development by NSW and Queanbeyan council of Tralee which is directly under the approach for Canberra Airport is a good case where the house deeds should have included a clause preventing the owners of the houses from ever complaining about aircraft noise or any other “pollution” from aircraft.

Aviation, in general, and aerodromes/airports, in particular, are critical services and infrastructure which are far too important to the greater Australian economy to be left in the hands of the State, Territory and local governments. Their town planners are too weak to stop large, rich, powerful developers from building houses and tower blocks that will have an adverse effect on the local airport/aerodrome, if not immediately, then in the fullness of time.

#### **Recommendation 1:**

Aviation is part of the federal government’s portfolio. The White Paper should propose that the State, Territory and Local Governments give the Federal Government strong safeguarding powers. The Federal Government could then protect the value to Australia of all airports by not allowing building developments within areas that would constrain operations.

I am aware that there have been complaints about aircraft noise from residents of the Samford, QLD area in relation to flight paths associated with the new runway at Brisbane Airport (BNE). Many of these houses are more than 20 nautical miles (approx. 40 Km) from touchdown. The *minimum* altitude at which aircraft can fly over the Samford area inbound to runway 01L at Brisbane on the Standard Arrival Route is 4,000 feet. The noise of these aircraft is only discernible because the ambient noise levels are low (except when the complainants are operating their ride-on mowers, chain saws and leaf blowers!)

#### **Recommendation 2:**

All town planners or appropriate authorities should be required to insert a clause in the deeds of all new houses built under the approaches to airports which allows, in perpetuity, the authorities to ignore complaints about aircraft pollution (noise, chemical or visual) from the owners/occupiers of such houses.

## General Aviation

Aerodromes serving general aviation can have a significant beneficial impact on the economy of the local town and region. In recent years the number of aerodromes has diminished and many of those remaining have had their activities constrained. As Australia's population grows it is increasingly in need of more aerodromes, not fewer, to provide the services which will be required by the expanding population. Forward thinking towns like Wagga Wagga and Toowoomba that have already made a commitment to expanding aviation in their community will be at an advantage in attracting new residents and industries, thus increasing the wealth of the region. Setting aside land for development for aerodromes and giving all those involved assurance that the aerodrome, whether existing or planned, will have a secure future is vital to the health of regional and metropolitan communities. An aerodrome or airport developer must know that their business is secure in spite of any new housing developments foolishly allowed near the aerodrome.

### Recommendation 3:

The government (Federal, State, Territory and Local), in this White Paper, should lay out plans to develop new smaller aerodromes on 'green field' sites around large and medium sized cities and towns. 'Build it and they will come'. As a minimum, the government should identify in their town plans areas which are set aside for the development of new aerodromes. Developments adjacent to the areas proposed for aerodromes should be made aware that the aviation infrastructure is planned and the deeds written in accordance with Recommendation 2 above.

## Privatise Air Traffic Management (ATM) in Australia

Airservices Australia (AA) is a Government Business Enterprise wholly owned by the Australian Government. The CEO reports to a board and the chairman of the board reports to the Minister of Infrastructure, Transport Regional Development, Communications and the Arts.

Background to my arguments below can be found in two papers on my website [www.thecrom.com](http://www.thecrom.com):

[Competition > Efficiency > Safety: ATM Competition in Australia \(and the USA\)](#)

[FAA ATO - Privatisation Doesn't Go Far Enough!](#)

To summarise these papers:

Competition drives efficiency and efficiency drives safety. Privatisation of the Air Traffic Management (ATM) organisation, AA, would result in:

- improvements to the efficiency of the ATM network generally,
- increases in the number of aircraft handled by AA with the same or fewer resources,

- increases in the number of aircraft handled at airports per hour, increasing the number of slots available and thus improving the frequency and number of services offered by airlines,
- concomitant reductions in the fees to airlines and aircraft operators (with reduced fares for passengers),
- improvements in the safety of the ATM system.

One criticism often levelled at such proposals is that the privatised ATM provider will cut safety corners to save money. Qantas was a state run entity prior to privatisation. Since privatisation Qantas has maintained one of the best safety records in the world. It is regulated by the Civil Aviation Safety Authority (CASA). The privatised ATM providers would also be regulated by CASA. Privatisation doesn't mean a reduction in safety.

There are several models around the world of privatised ATM service provision. The UK's system is a good example of the practicalities of a mature privatised system (for more information please see the papers – links above).

In its Annual Report 2015-16, the CEO of AA, reported, "We were not operating as efficiently as we should" and goes on to say that a new operating model designed to match AA's commitment to safety, "with a customer-centred and commercially rigorous approach to business" is to be introduced. However, in Australia the Civil Aviation Safety Regulation Part 172.024 Applicant for Approval as ATS Provider states that there are only 3 eligible providers of air traffic services in Australia: the Commonwealth (ie the Department of Defence), AA, or an organisation in cooperation, or by arrangement, with AA.

Defence can't and won't provide services at civil aerodromes. AA will not authorise another provider. Therefore, AA has a monopoly position enshrined in law. And we all know what monopolies are like when it comes to commercial rigour.

#### **Recommendation 4:**

The government should privatise the ATM system in Australia and make a firm commitment to that end in the White Paper.

I trust these suggestions will assist in informing the review of the Green Paper and produce a valuable White Paper for the future direction of Australian aviation.

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30 October 2023