

## **Submission**

### **Safeguards for Airports and the communities around them**

About the author:

- IFR twin, night rated Pilot
- Aircraft owner (4 seat single engine)
- Vast flying experience
- Experience through a reasonable sample of airports throughout Australia
- Solid knowledge in the General Aviation arena

Points of note in the discussion paper

1. Little is mentioned nor discussed on PROTECTING EXISTING AIRPORTS from the “land grab” by local councils and developers. The trend is to sell off airports, run them down, make it prohibitively expensive for aviation to utilise, develop a “master Plan” which is reviewed 5 years or so down the line. The review will generally act on clauses that identify patches of the airport that are “surplus to use” which then promptly gets a DA for factories, commercial or residential use. A look at Bankstown, Essendon, Moorabbin, Hoxton Park (now closed and about to become a housing estate) and just about any airport that has been sold off tells the story.

Q: WHERE ARE THE SAFEGUARDS?

2. As a pilot and aircraft owner it’s now unviable for me to use airports like Bankstown, Essendon etc as costs to use and park aircraft are prohibitive. These entities purchased the airport as an airport, not development sites, knowing full well they run at a loss and are unlikely to ever make money. Unfortunately the development wins out too easily.

Q: WHERE ARE THE SAFEGUARDS?

3. I can give countless examples of how this cheap land grab has evolved. One example is Coffs Harbour airport. This airport is one where GA has declined markedly over the years. One can now pretty much set up a cannon and have it shoot every 5 mins across the runway and never hit anything. Yet, many have tried to lease a plot of land to build a hanger from council to no avail. Council cites all sorts of excuses as to why no new land will be released for a simple yet necessary thing as a hanger to protect aircraft from the sometimes violent weather. Yet a whole section has gone through re-zoning for commercial use and non aviation related buildings are starting to be erected. Many owners and pilots have to leave aircraft out in the weather or, like everywhere else, relocate somewhere else. Many owners have had enough and simply sold up and given up participation in aviation, adding further to it’s decline.

I would suggest as an exploratory exercise someone calls and inquires about leasing land to build a small hanger and see what answers they get.

THIS IS AND HAS BEEN AN AIRPORT BEFORE ANYTHING ELSE. NOT A COMMERCIAL PRECINCT. THE SITUATION IS OCCURRING RIGHT ACROSS THE COUNTRY. ONCE AN AIRPORT IS GONE IT'S GONE FOR GOOD AS THERE ARE NO PROCESSES IN PLACE TO ENCOURAGE THE OPENING OF NEW AIRPORTS.

Q: WHY ARE PEOPLE BEING DENIED LEASING TO INVEST IN AVIATION? WHERE ARE THE SAFEGUARDS?

4. The paper does not indicate any proposals for the establishment of new airports. WHY?
5. <http://www.aviationadvertiser.com.au/2008/11/first-class-opportunity-to-take-off/>

Please refer to link above for what has happened to business at Bankstown. The reality of privatisation is an instant and once off cash injection to government, followed by the demise of aviation in favour of more units, factories and housing. These airports belong to each and every one of us AUSTRALIANS, not just a few. So why are they being sold off?

Q: WHERE ARE THE SAFEGUARDS?

The solution is to SAFEGUARD AIRPORTS from:

- a. Sell off's. They must remain in government control, and those that have been sold off have to be reviewed urgently and development curtailed before it's too late. Already we have lost the like of Hoxton Park. How disgraceful that as soon as it was closed the bulldozers moved in to destroy the runway ensuring no chance of it re-opening. Once an airport cannot ever be used for anything else but aviation related purposes, developers will leave them alone.
- b. Re-zoning. A new zoning that means "AIRPORT FOREVER". Airports must remain as their own entity. The only development allowed being for "aviation" and restricted recreational use (aero clubs, bars, aviation park residential development etc)
- c. Development for non-aviation commercial or residential absolutely never possible on land zoned as "airport"
- d. Turning airports into a declining/deteriorating asset. Government needs to set up incentives for aircraft manufacturers to set up shop at airports. There is a huge demand for modern GA aircraft as most of the GA fleet is now over 30yrs old. If say, Cessna, piper, Mooney etc were given a reason to set up shop in Australia, we could be the worlds supplier of modern aircraft due to our favourable weather, relatively flat terrain, Excellent skills base and world class manufacturing. The biggest hurdle here would be to decommission CASA or at least remove CASA from the GA arena as their 50yr old rules and regulations are hindering the use of modern technology, materials and methods of building aircraft. Regulations that were required back in the 50's and 60's but now outdated and irrelevant in today's world. An analogy would be just like building an old FJ holden. Few would buy one, fewer would want to drive one as it lacks all the mod-cons. One has to look at the "Experimental" side of GA to realise that without the pre-historic rules hindering them, aircraft built by amateur

builders are safer, faster, more economical and comfortable than anything offered by the “certified” manufacturers. However without airports we can lose this fast growing sector too.

It amazes me that the issues/questions raised in the discussion paper pertain generally just to the big airline type operation, yet they make up a very small proportion of the total Aircraft fleet in Australia. More incredible is the fact that there are only some 13,000 aircraft in total with little plans to encourage more. The majority of this fleet is GA. If more people were to fly, the savings in road infrastructure, road fatalities and pollution impact on the environment could be cut drastically. In essence a GA aircraft only requires a “1km stretch of road to take off and land”. National highways and secondary roads require much more. We are losing an opportunity which if more and more airports fall victim to the developers “quick Dollars” we may never be able to open airports in convenient locations again.

The following relates to questions raised in the discussion paper.  
For Q1-5 see answer below Q5

1. **Does the ANEF system provide an effective basis for planning in noise affected areas?**
2. **How effective is the ANEF system as a land use planning standard for greenfield developments around airports?**
3. **Are the acceptable levels of aircraft noise for particular develops identified in AS2021 consistent with current community expectations?**
4. **How can the current planning arrangement to address developments in noise-affected areas around airports and under flight paths be improved to take account of community expectations, while also providing for the reasonable growth of aviation activity at airports?**
5. **For developments around the major capital city and freight airports, should state governments have to refer residential development within a defined buffer zone to the Commonwealth Transport Minister or Secretary for approval?**

Comments for Q1-5:

ANEF is a start. However legislation needs to be urgently passed that for any land, existing and proposed development, housing or otherwise, within an airport circuit area and circling area be advised on title to that land as “affected by airport operations”. This would discourage ruthless developers and government ministers biased towards development from commencing such activities as the prices they will realise would be far lower. Ultimately, money talks and sort out the issue.

Secondly, legislation needs to be passed and owners of privatised airports have their leases revoked should they develop any land that affects operations on or near airports where the development does not pertain primarily to aviation use.

**6. Should the current protection of airspace regulatory provisions be strengthened and broadened to cover all CASA-Certified and Registered aerodromes?**

YES

**7. How might state, territory and local government planning rules help protect airports from encroachment by unsafe intrusions into airspace?**

Refer to answers for Q1-5

**8. Should there be a consistent industry standard for mechanical turbulence and wind shear? If so, should the standard be proscriptive or allow for a case by case assessment?**

A basic industry standard that then allows for a case by case variation as required

**9. Should expert modelling reports on turbulence and wind shear be mandatory for developments in close proximity to runways and who should bear the cost?**

YES, the developer and council.

**10. Given variable regional circumstances for birds and flying foxes, would a recommended standard zone (e.g. 15km radius) be appropriate?**

Yes

**11. What other planning issues might arise in safeguarding against birdstrike?**

**12. What guidance do state, territory and local governments require on the siting of wind farms and the potential impacts on aviation?**

Generally, as a pilot, wind farms are of little issue. As long as they meet height restrictions and are of high visibility they pose little threat. As for distorting radar images etc, should CASA be prodded into the 21<sup>st</sup> century regarding making use of modern equipment/technology and simple regulations that allow such, there is no use for radar. ADSB for example is a far superior system to radar, cheaper to run and install and will allow every aircraft to know where others are in close proximity plus Air traffic controllers have accurate position reports of all aircraft. The hindrance in reality is cost. Costs are high because the regulations pertaining to the design and manufacture of anything for aircraft are old, irrelevant and so time consuming that by the time a manufacturer brings a product to market its cost has blown out and the technology is now 5 years behind the latest technology.

**13. Should developers of wind farms be required to provide CASA with a report on the potential impacts on aviation and aviation infrastructure of the turbines?**

NO. CASA needs to provide and help the developers with the requirements

**14. Should development of technical facilities near aerodromes (say within 5 km) require automatic referral to CASA for assessment of impact on radar and navigation systems?**

Yes, however the question would be “is CASA capable of such a task?” Mainly due to their rules being so outdated they do not fit into the modern state of affairs.

**15. What additional guidance do state, territory and local governments require on the siting of technical sites and the potential impacts on radar and navigation systems?**

**16. Are CASA’s current requirements sufficient, and what additional guidance might state, territory and local governments require regarding lighting and pilot distractions?**

As a pilot, the better lit the obstacle and runway the better. CASA’s current requirements appear to have been drafted in years gone by when the street and ground lighting was less common and of a different type. As I fly a fair amount at night it is often frustrating trying to find an airport at night when it blends in with the surrounding lights. Suggestions would be:

- a. Better, brighter runway lighting
- b. The four corners of the runway edges fitted with a red strobe flashing at say second intervals

One only needs to fly at night into Bankstown or Essendon for example, to realise that the lighting may have been adequate back in 1950 when development around airports was minimal. However the airport lighting is now of a much lower quality and grade than the built up areas around the airport.

CASA needs to review its regulations with an emphasis on allowing the use of modern “off the shelf” lighting and components that will allow better visibility, reduced power consumption, better longevity and minimal maintenance. (E.g. LED’s)

**17. Should an approach based on the identification of public safety zones be introduced to help ensure that new developments around the ends of runways do not lead to undue levels of risk?**

YES

**18. For which airports might such public safety zones be identified – all airports or only major airports with regular airline traffic?**

Airports where development infringes the direct take off and landing paths from runway end to a point where an average aircraft attains at least 500ft of height under max takeoff conditions with engine failure occurring shortly after takeoff.

**19. What methodology and criteria should be applied in defining the boundaries of a PSZ?**

See answer 18 above

**20. What sort of additional controls might be imposed for new developments in identified PSZs?**

1. Land title to explicitly indicate that the land is affected by airport operations, with a caveat restricting the ability to change zoning.
2. Land holders to be notified and real estate agents forced to disclose that the property is affected by airport operations
3. The land holder having acquired the land in full knowledge of the restrictions cannot at a later date lobby council/Mp's to change the situation

**21. What sort of steps might be taken to ensure the identification of a PSZ does not unduly affect the value and enjoyment of existing properties within the zone?**

These properties were likely to have been built AFTER the airport was and owners knew full well of the impacts. If people purchased cheaply in full knowledge that the property was near an airport and likely to affect its value, so be it. The airport was there first and safety cannot be compromised just so individuals can profit.