



**ACT Government Submission
National Aviation Policy Green Paper**

February 2009

Contents

Introduction.....	3
1. Aviation Safety	3
Provision of Emergency Services at Airport Precincts.....	3
2. Aviation Security	3
Wheeler Review.....	4
3. International Aviation	4
4. Domestic and Regional Aviation.....	5
Domestic Services	5
Regional Air Services.....	5
5. General Aviation.....	5
6. Industry Skills and Productivity.....	6
7. Consumer Protection.....	6
Disability Standards	6
8. Airport Infrastructure	7
Regulatory Regime and Non-Aviation Development	8
Airport Master Plans	9
Airport Planning Advisory Panels.....	10
Major Development Plans	11
Community Consultation	12
Integrated Management of Airports	12
Airport Related Infrastructure Requirements	12
Car Parking.....	13
Other Initiatives.....	14
- Identification of Incompatible Uses	14
- Inappropriate Development around Airports.....	14
9. Aviation Emissions and Climate Change	15
10. Noise Impacts.....	15

Introduction

The ACT Government congratulates the Australian Government on its release of a comprehensive National Aviation Policy Statement, and welcomes the opportunity to provide comment on the Green Paper.

As indicated in the ACT Government submission on the previous National Aviation Policy Statement Issues Paper (2008), the ACT Government has a major interest and stake in National Aviation Policy. The development of the Aviation White Paper is one of the few opportunities Government has had to make a case for planning and other reforms in the regulation of Australian airports since the privatisation of the Federal Airports more than a decade ago.

The ACT Government recognises the role and contribution of the major airports to the economic and social wellbeing of the communities that they serve. The Canberra International Airport is a key economic driver for the ACT, and is a major gateway for the Capital Region. The ACT Government supports growth at the airport and in aviation services to the region – but notes that this must be achieved in a balanced and well planned way.

The ACT made a detailed submission to the Issues Paper. This submission reiterates key points from the previous submission, while providing additional information in relation to key issues such as planning, infrastructure, and noise.

The ACT Government looks forward to working closely with the Australian Government to streamline key elements of Aviation Policy as they relate to the ACT.

1. Aviation Safety

Provision of Emergency Services at Airport Precincts

The ACT Government submission to the Issues Paper noted that responsibility for provision of emergency services at non aviation (non airside) precincts of major airports may require review to ensure that appropriate force responses can be made to events as they occur. The increasing number of non aviation developments at airports such as office buildings, retail facilities and hotels increase the potential need for emergency service responses to incidents at these establishments.

In respect of the Canberra International Airport, Air Services Australia, Aviation Rescue and Fire Fighting Service has responsibility for aerodrome (airside), and the ACT Government non airside precincts. In terms of force capability, Air Services Australia does not provide a 24 hour service (with the ACT Government providing services after the airport closes), gives priority to aviation fire-fighting and rescue services and has limited capacity to deal with some specialised categories of urban fire fighting and rescue. For example, structural and high rise fires, hazardous materials and road accident rescue.

Similarly, the regulatory responsibilities of the jurisdictional brigades at airports (such as the ACT Fire Brigade) may need to be better defined. This particularly applies in regard to approving/enforcing safety measures within buildings on the airport precinct.

It is proposed that the Australian Government, in consultation with State/Territory governments, undertake a policy review of arrangements for provision of emergency services at non airside areas of major airports. Issues to be addressed would include legislative and regulatory requirements, force capability and funding issues associated with the provision of emergency services to airports, particularly those with significant growth in non-aviation uses.

2. Aviation Security

The ACT Government considers that the following principles should be considered in respect of developing future aviation security arrangements:

- Aviation safety including security should remain the key focus for government and industry.
- If airport throughput increases, the law enforcement capability and response should be reviewed and, if necessary, increased.
- There should be a consistent approach to passenger security screening regardless of aircraft type.
- There should be a consistent approach to passenger security screening regardless of flight type.
- New technologies should be evaluated and adopted as they become available. Any technological advances introduced into the aviation security environment have the capacity to impact on law enforcement resources due to an increase in detection of criminal offences.
- The costs of increased security and potential impact on the operation of regional airlines and thus regional tourism need to be minimised.

Wheeler Review

The Wheeler review recommended the formation of specially trained on site police units. The review called for co-operation between State and Federal police assigned to patrol the airports.

The ACT Government supports an Australian Government led review of implementation of the recommendations in the Wheeler review, specifically including the establishment and operation of the specialised Airport policing units.

3. International Aviation

The ACT Government submission noted that there is an existing proposal for Canberra International Airport to be fully designated as an unrestricted international airport enabling expanded opportunities for direct flights to some overseas destinations. This would provide significant benefits to the ACT and the surrounding

region for outbound and inbound passengers, improving business and tourism links to the region.

4. Domestic and Regional Aviation

Domestic Services

The ACT Government also wants to encourage increased competition by airlines from Canberra on domestic routes to all other Australian capital cities, both for business and private travel and inbound tourism.

The Canberra community has been disadvantaged by a lack of competition on some routes, resulting in high fares and a lack of choice and flexibility for customers. For example, on the direct Canberra to Sydney route, Qantas was the sole carrier for a number of years and this monopoly situation enabled Qantas to charge premium fares for both business and private travel. The re-introduction of a direct Virgin Blue service from Canberra to Sydney is understood to have improved this situation.

To maintain a competitive market into and out of Canberra Airport, the ACT Government supports the maintenance of a policy of 'best fare of the day' by Commonwealth Government Agencies.

Regional Air Services

The ACT Government recognises that regional air services play an important role in Australian travel because of the vast distances of some regional and remote communities from capital cities or major regional centres.

Canberra International Airport houses a number of regional air services that provide direct routes to regional destinations. For example, Brindabella Airlines provides a direct Canberra to Newcastle service.

Security is a key issue for regional airports. It is suggested that the same security and safety measures be adopted for regional services as for major capital city trunk routes.

5. General Aviation

The ACT Government submission identified that the privatisation of the major airports has had a significant impact on General Aviation (GA) operations at major airports as airports endeavour to maximise the return per square metre of developable land, and the return per landing or take-off.

At some time in the future, there may be a requirement to consider the relocation of existing GA operations from the Canberra International Airport; however the benefits of the current location of GA operations to the tourist and leisure markets would need to be assessed at that time.

The ACT Government has suggested that the Australian Government develop a specific policy on whether GA should continue to co-exist with passenger/freight/other services at major airports. The Green Paper does not contain any commitments or way forward on this issue other than (page 41) to *'improve*

planning arrangements at Australia's leased federal airports to provide greater certainty to airport users on the future aeronautical uses of airports'.

Further direction is required from the Commonwealth on the provision made for GA at the primary and secondary airports.

6. Industry Skills and Productivity

Regional airlines have had difficulties recruiting and retaining pilots, with losses occurring to other domestic airlines.

As indicated under Regional Air Services, it is considered important that existing regional services be maintained and new regional services be established consistent with demand. The shortage of pilots for these services will have an effect and appropriate arrangements should be put in place to ensure a continuing pool of new pilots are available for the regional airlines sector.

An Australian training program for new pilots would ensure that there is an adequate pool for our domestic and international carriers, limiting the need to recruit from overseas.

It is suggested that the Australian Government, in consultation with State and Territory Governments and the Aviation sector, develop a national aviation pilot training program.

7. Consumer Protection

A recent report from Consumer Affairs Victoria (CAV) detailed the development of best practice airline and airport customer service charters, including the development of improved consumer protection in the form of voluntary passenger charters.

The CAV report found evidence to suggest that airlines do not always effectively handle complaints. The report provides details of an investigation into complaints against all four domestic airlines flying in and out of Victoria. CAV recommends developing voluntary airline customer service charters as has been done in the United States of America and to a lesser extent in Europe.

The ACT Government supports further consideration of this approach.

Disability Standards

The ACT welcomes the Green Paper's proposal to establish an *Aviation Disability Working Group* to work with groups representing people with a disability in order to find ways of improving access to aviation services.

The ACT Government submission on the Issues Paper also raised concerns about the Disability Standards for Accessible Public Transport 2002 in relation to airline

passengers with a disability. The ACT suggested that the Australian Government give consideration to amending the current Transport Standards to reflect a policy position that is consistent with international positions. Such a policy might be limited in its application to (larger) providers with an annual turnover of a preset amount.

These concerns have not been addressed specifically in the Green Paper. However, the Green Paper advises that the Australian Government proposes to detail its future strategy on disability access issues in the transport context, when it responds in early 2009 to the review of Transport Standards under the *Disability Discrimination Act 1992*. The ACT Government looks forward to this response.

8. Airport Infrastructure

The Green Paper includes broad planning initiatives which the ACT Government considers to be of merit, including:

- strengthening the master planning process to provide increased transparency;
- revising thresholds for major development plans;
- closer scrutiny of non-aviation development;
- identification of non-compatible land uses;
- safeguarding the aviation future uses of airports;
- better managing the impact of aircraft noise on local communities; and
- developing co-operative arrangements with the States/Territories and local government to better integrate airport planning with local planning policies.

However, the Green Paper lacks detail on each of these planning initiatives. The document foreshadows further engagement with States/ Territories and local Government (page 166) over the initiatives, although no program is provided. In particular, further detail is required on the proposed new triggers for major development plans, the operation of the proposed Airport Planning Advisory Panels, the proposed requirement for precinct plans for non-aeronautical development, use of Ministerial call-in powers and other initiatives.

These are all important matters, and accordingly, it is recommended that the Green Paper be revised and re-exhibited for comment. If this course is not favoured, then, at a minimum, the ensuing White Paper should include an implementation plan detailing each initiative, together with a timeframe for implementation and how the Commonwealth proposes to consult with the States/Territories and local Government.

Planning issues associated with airport growth should be elevated in the Green Paper, commencing with an acknowledgement of 'Planning' in the table of contents (eg: Chapter 8 should be titled Airport Infrastructure and Planning). Compared to other issues, the Green Paper does not provide adequate discussion about planning issues, in particular the impacts of airports on metropolitan spatial planning.

There was comprehensive discussion of airport planning issues within the ACT Government submission on the Issues Paper, together with many other submissions. The ACT Government submission raised concern with:

- the lack of scrutiny of airport development against local, State and Territory planning controls and the associated competitive advantage gained by airports;

- the significant impact of airport development on metropolitan planning; and
- the off-airport infrastructure costs associated with airport growth.

In particular, the ACT Government submission to the Issues Paper noted that the emergence of significant non-aviation developments on airport land without planning restrictions has the potential to distort the pattern of spatial planning in cities, leads to increased demand on local road infrastructure, challenges established planning strategies of directing growth into town centres well-served by public transport, and threatens the viability of existing centres. Such issues, however, are barely canvassed in the Green Paper, which fails to reflect their importance to Governments and the community.

Regulatory Regime and Non-Aviation Development

The ACT Government submission on the Issues Paper commented that the planning and development mechanisms under the Airports Act do not appear to be working effectively as they do not take account of the impact of airport development on metropolitan areas and communities. The submission identified the need for planning reforms. However, the Green Paper indicates that *“the Government intends to continue with regulatory arrangements which support investment”* (page 165). Elsewhere the document indicates that *“there is no intention to over-regulate”* (page 16). Even with a continuation of the current regulatory framework there remains a cogent argument for greater transparency in the airport planning and development approval process.

There is broad agreement that aviation uses, direct or indirect, and defence uses on airport land should be exempt from State and Territory planning laws. The ongoing issue for Governments and communities is the significant growth of non-aviation uses at airports and their impacts on metropolitan planning and local infrastructure. The significant issues associated with non-aviation growth are not discussed in the Green Paper, nor is the ACT Government proposal that such uses be subject to local planning controls.

The Green Paper indicates (page 16) that proposals for non-aeronautical development will be *‘closely scrutinised’*, however, there is limited information on how this will be achieved. As indicated in the ACT Government submission, in August 2006, the State and Territory Planning Ministers and the Australian Local Government Association¹ recommended that non-aviation airport development be addressed in the following manner:

- That such development be planned as part of the region within which it is located and be subject to relevant state and territory planning laws, policies and procedures;

¹ The former Federal Minister for Transport declined to support this resolution. However, his Government did promulgate a set of guidelines encouraging airport owners to plan new developments as though they would have to meet the local planning requirements. Similarly, the Australian Transport Council (2007) and the Local Government and Planning Minister’s Joint Committee (2008) have both supported the model of referring airport master plans and major planning proposals to an independent panel for review, with the non-aviation proposals to be assessed for their impact on local land uses, schemes and infrastructure.

- That any land the Australian Government may subsequently acquire and lease to an airport lessee that is put to non-aviation use be also subject to relevant state and territory planning laws, policies and procedures;
- That all master plans and major planning proposals at airports be subject to review by an independent panel which assesses the proposals, including their impact on surrounding land uses, relevant local government planning schemes and infrastructure; and
- Whilst non-aviation development control at airports remains with the Australian Government, it should provide clarification as to how it will enforce conditions of development approval placed on airport lessee companies and what role state and territory governments are expected to play in relation to these conditions.

Since it is apparent that non-aviation uses are not proposed to come under local planning control, the regulatory regime (whilst providing for continued Commonwealth responsibility) should provide mechanisms whereby the Federal Minister can take into account the local land use, planning, environmental and infrastructure impacts when considering airport master plans and major planning proposals. This should be achieved by the Australian Government amending the *Airports Act 1996* to require the Federal Minister to formally consider State, Territory and Local Government planning and environment policies of the jurisdiction in which an airport is located, during the assessment of airport master plans and major development plans.

Airport Master Plans

The ACT Government submission noted that airport master plans lacked sufficient detail to permit State, Territory and local governments and the community to properly assess the implications of proposed growth. The ACT Government also raised this issue during public consultation on the Canberra International Airport 2008 Master Plan, and this master plan was subsequently rejected by the Commonwealth for its lack of detail on key proposals. The Green Paper (page 167) accepts the need for the airport master planning process to be *'strengthened to provide greater transparency and certainty about future land uses at airports'* but gives limited direction on how this will be achieved.

The Green Paper identifies the need for master plans to provide a detailed articulation of planned developments in the immediate three (3) to five (5) year period. This initiative is supported. It also suggests a ground transport plan be prepared and that environmental strategies be incorporated into the master plan. The Green Paper indicates that the transport plan would consider issues such as public transport, car parking and access arrangements. However, it is important that this plan addresses the traffic and transport pressures associated with airport, particularly on the surrounding road network. Further, it should indicate how the airport will contribute to the costs of any required infrastructure works associated with airport growth.

The Green Paper indicates that the Government will consider the introduction of powers for the Minister to call for, consider and approve precinct plans for areas which are to be used for non-aeronautical development, setting out the nature of the development, its impacts on and off airport, and proposals for addressing the impacts. There is no further detail on this initiative such as when precinct plans will be

required, how they will be assessed, and how they will promote transparency of process and adequate community input. Any precinct plans should be considered by the Independent Airport Planning Advisory Panel, along with master plans and major development plans (see *Airport Planning Advisory Panels* below).

The ACT Government submission advocated full disclosure in airport master plans of proposed development activities, and the associated on and off airport needs. It requested master plans consider the strategic planning context and government planning policy context in the city in which airports are located. Various suggestions were made in the submission as to how information in master plans could be improved, however, none of these are reflected in the Green Paper. The suggestions included requiring master plans to:

- Provide sufficiently detailed information (same applies to major development plans) such as would be required for any off-airport master plan or significant development proposal. This includes details of current and future uses in each part of the airport including of the area take-up or floor space of each, proposed parking/ servicing/ access arrangements, transport and traffic issues, hours of operation, socio-economic and environmental impacts, and so on;
- Describe/list the changes from the previous approved master plan;
- Assess the local, metropolitan, and regional implications of the master plan and major development plans;
- Consider the impacts and relationships with adjoining and surrounding areas;
- Outline any Australian Government endorsement of a strategic direction indicated in the master plan;
- Provide detailed information about the infrastructure and service utility implications of the proposed development, including in relation to the timing of required works;
- Address contributions to off-site works and the process to engage with State and Territory Governments and Local Councils and service providers in planning for the new works
- Address impacts on any threatened or endangered ecological communities and species; and
- Address climate change issues.

In addition, it was suggested that an independent panel be appointed in each State/Territory to assess airport master plans and major development plans. This latter suggestion is reflected in the Green Paper and is addressed below.

Airport Planning Advisory Panels

The ACT Government submission recommended the use of expert and independent assessment panels for all airport master plans and major development proposals. The acceptance of this recommendation in the Green Paper is a positive step, although there is insufficient information on the role, function and composition of the panels.

The Green Paper suggests that the Panel would assess airport master plans and major development plans '*at the Minister's request*' (page 166). However, it is

recommended that all master plans and major development plans be considered by the panels. Further, that the panels operate as follows:

- The Australian Government Minister be given the power to establish expert and independent Airport Planning Panels;
- The panels consist of three (3) appointments by the Federal Minister for Transport, including the Chair of the panel, and at least two (2) from the State/ Territory Government, nominated by the Planning Minister in the relevant State/Territory;
- Any community representation on the panel having appropriate planning and/or aviation expertise;
- The panel being required to formally consider State, Territory and local Government planning and environment policies of the jurisdiction in which an airport is located, during assessment of airport master plans and major development plans;
- The panel considering the social, economic, environmental and other implications of airport projects; and
- The panel assessing any precinct plans for non-aviation development and infrastructure plans associated with master plans (see *Airport Related Infrastructure Requirements* below).

It is imperative that the role and functions of the panels be clearly defined and that sufficient weight is given to their decisions.

Major Development Plans

The ACT Government supports a review of the triggers for major development plans to ensure they do not allow proposals that may have significant community impacts to proceed without community consideration. The Green Paper indicates that thresholds may be developed so as to address the range of potential community impacts airport development may have, including environmental or economic impacts, impacts on access to the airport, traffic congestion, local transport networks and noise.

It is recommended that State, Territory and local Governments be consulted further in the development of these thresholds, due to their experience of the likely impacts of development proposals within their jurisdictions. Further, thresholds should be based on impact rather than cost estimates only, and should be cognisant of the cumulative impact of proposals. For instance a series of commercial developments may seem innocuous if presented as separate proposals. However, it is the sum of these proposals that has the potential for cumulative impacts on the surrounding environment, and other commercial centres.

Recognising that any defined triggers will not be able to encapsulate all local issues, the Green Paper proposes Ministerial call-in powers for major development plans that may have significant community impacts. It foreshadows the development of objective criteria for the use of the call-in powers, in consultation with other levels of government, the industry and the community. Such consultation is appropriate, however, consideration should also be given to how Ministerial call-in powers will promote transparency of process and adequate community input.

Community Consultation

The ACT Government submission advocated a strengthened consultative processes in order to keep the local community informed throughout the development and implementation phases of the airport master planning process.

The Green Paper proposes that airport lessees be required to establish community consultation groups to foster effective community engagement in the airport planning and operations issues. Canberra Airport already has such a group, although the frequency of meetings could be increased beyond the three (3) held annually and the Green Paper suggestion of an independent chair should be considered, as the Canberra Airport currently chairs these meetings. Thus the issue for the ACT is not necessarily about establishing another consultative group, but about improving the exchange and quality of information available to the community.

The ACT Government submission made a number of suggestions, few of which are reflected in the Green Paper. It is recommended that these matters be further considered in the development of the White Paper. These suggestions are as follows:

- Greater detail of current and future proposals in airport master plans;
- The preparation of reports (made available to the public) on how the issues raised by stakeholders on draft master plans and major development plans have been addressed in final master plans;
- Monitoring compliance with consent conditions on approved major development plans (with results made available to the public); and
- The holding of independently conducted public meetings on airport master plans having regard to the strategic and long term issues these can raise for Governments and the community as a whole. Presently, the only public briefings on master plans are those initiated by the airports themselves, under their own conditions. Independent public meetings could also be held for major development plans.

Integrated Management of Airports

The ACT Government submission advocated integrated management of airports across jurisdictions. It proposed the Australian Government establish a consultative process with States and Territories to provide the opportunity for consultation on airport master plans of other jurisdictions. The rationale for this was that issues arising at one airport can have significant impacts on others. An example is the proposed upgrade of the Sydney east-west runway for safety improvements, which was advised as resulting in diversion of flights to Canberra. The outcome of decisions on matters such as this may have economic, social and environmental consequences for the ACT Government, the city, the region as well as at a national level.

The initiative of integrated management of airports does not appear to be addressed in the Green Paper. It is recommended that appropriate arrangements be established to permit cross-jurisdictional consultation on airport planning.

Airport Related Infrastructure Requirements

The ACT Government submission noted that airport development has a significant

impact on state and territory planning and infrastructure delivery. Development at airports can place strain on existing road networks that may not be programmed for augmentation for many years, and hasten the need for upgrading of key services and infrastructure by both Government and utility providers alike.

However, there is rarely adequate engagement by the airports with the relevant local/ State or Territory Government or service providers. Nor does there appear to be a willingness to fund the costs of work that might be required in order to enable, or mitigate the impacts of, the airport expansion. The Green Paper indicates that Government could improve approval processes by '*examining the impact of airport development on surrounding transport and community infrastructure and how the leased federal airports might contribute to this infrastructure*' (page 168). However, it does not provide any further detail or timeframes for implementation of this initiative.

Even if the Commonwealth Government does not intend to amend the *Airports Act 1996* to bring new airport developments under the planning control of local jurisdictions, it is essential that the Commonwealth devise a way to ensure that some or all of the off-site costs of new development is met by the airport rather than by local jurisdictions.

The ACT Government suggested that consideration be given to the development of an engagement strategy and infrastructure planning process to address the costs of off-airport works required to support future airport expansion. It recommended that:

- Airports identify off airport infrastructure demands and costs required to support airport developments, in master plans and major development plans;
- The Federal Minister for Transport have the responsibility to determine infrastructure funding arrangements in considering master plans and major development plans;
- A key outcome of such a process is an 'Infrastructure Plan' that identifies the infrastructure investment required and an agreed financial contribution by the relevant stakeholders. The plan would allow for the timely provision of infrastructure by allowing Governments to plan ahead of any requirements. In so doing, it would also be likely to minimise community criticism of road congestion around airports, particularly where such airports are centrally located; and
- The infrastructure plan is overseen/enforced by the Federal Government.

As with other key documents (master plans, major development plans, precinct plans), the infrastructure plan should be considered by the Airport Planning Advisory Panels. The Panel should have the ability to request an independent consultant to verify the estimated infrastructure demands and costs listed in the infrastructure plan.

Car Parking

The Green Paper re-confirms that the Federal Government has directed the Australian Competition and Consumer Commission (ACCC) to monitor parking fees at the five (5) major airports. As Canberra is not one of the five major airports, it is presumably not included in this review. However the issue of increased parking fees and concerns about airports' monopoly position in this regard, is also an issue for Canberra Airport. Accordingly, consideration should be given to including Canberra Airport in this review to ensure greater transparency and accountability for the car parking facilities

at this airport.

Other Initiatives

Identification of Incompatible Uses

The ACT Government supports the Commonwealth identification and prohibition of land uses such as residential, aged care, community care and public child care facilities, hospitals and schools that are incompatible with the operation of an airport. It is inconceivable that such uses continue to be permitted on the leased federal airport sites. It is exactly these uses that airports rightly object to in areas located in close proximity to airports.

Inappropriate Development around Airports

The ACT Government submission identified that off-airport developments such as tall buildings may compromise the safe and effective use of aviation infrastructure. It suggests the Australian Government provide clear, non-technical requirements that can be addressed through relevant planning and other regulations. The ACT supports the Green Paper proposals to develop clear regulations for safeguarding airports from off-airport development that is inconsistent with future operations and development of the airports. This would address such matters as airspace protection (building height), materials and land uses around airports, with the goal of safeguarding the public, and providing for the safe operation of airports.

The Green Paper foreshadows (page 169) the public release of a more detailed discussion paper on a national airport safeguarding framework. It notes that the framework would need to consider whether safeguarding provisions should apply to both new and existing development, or if it is to apply to existing development what criteria should be applied. There are likely to be constraints in imposing safeguards on existing developments surrounding airports, however there is scope to consider the inclusion of new safeguarding measures within ACT planning legislation, if appropriate. It is recommended that consultation occur with State/ Territory and local Government in the preparation of this discussion paper.

Overall the Green Paper provides a step in the right direction by identifying reforms required to planning and development at airports. However, it lacks sufficient detail on each of the reform initiatives. Accordingly, it is recommended that the Green Paper be revised and re-exhibited for comment to provide State/ Territories and local government the opportunity to consider the detail of each proposed initiative. If this course is not favoured, then, at a minimum, the ensuing White Paper should address each initiative in detail, and provide a program for implementation. Further consultation is recommended with the States/ Territories and local government concerning all of the planning reform initiatives.

9. Aviation Emissions and Climate Change

As noted in the submission on the Issues Paper, the ACT Government is committed to working with the Australian Government, the States and the Northern Territory on a comprehensive emission trading system that will, in time, include ways to reduce aviation emissions.

The ACT's emission reduction target was developed to be compatible with targets adopted by the States and Territories, with Federal Labor's election policy and the policies of countries in the European Union. None of these targets address aviation emissions in the manner suggested by the Australian Institute report.

The ACT Government believes that airports should also be required to address aviation emissions issues in their Master Plans, including the development of proposals to reduce emission levels.

10. Noise Impacts

The Green Paper rightly acknowledges that current information on noise is too technical and often misunderstood by the local community who are seeking clear answers to their questions about how noise might affect them (page 192).

The Green Paper indicates the Government's view that it is possible to improve the general understanding of the impact of airport noise by revising the quality and clarity of information provided to the public and the framework under which this information is provided. It suggests a new framework for noise monitoring and reporting by airports, however, it is unclear whether the Commonwealth intends to enforce this or whether this will remain at the discretion of each airport operator. Consistent noise-monitoring and reporting procedures should be enforced across all airports by the Commonwealth.

The ACT Government submission noted that in terms of helping people better understand the effects of aircraft noise, it would be beneficial if airports were required to publish N70 diagrams in addition to Aircraft Noise Exposure Forecasts (ANEFs).² This suggestion is not addressed in the Green Paper.

The Green Paper advocates the maintenance of a north-south and east-west network of non-curfew airports which it indicates is crucial to maintaining access for airlines and air freight services to major airports such as Brisbane, Cairns, Canberra, Melbourne and Perth. The ACT Government supports the growth in aviation at Canberra International Airport, including its development as a potential freight hub, subject to consideration of the impacts on the community, metropolitan planning and infrastructure provision.

² N70 is an index which represents the number of aircraft events/movements which generate a noise level of 70dBA or higher at any given point. The N70 takes account of the accumulation of movements over time and is expressed as a number of events on an average day. Usually this is presented as the number of events above a specified noise level on an average day. The National Acoustic Laboratories work that led to the adoption of the ANEF identified 70dBA as the noise level at which there was a significant adverse response and correlation with people's reaction to noise.

The Green Paper foreshadows (page 196) working through the Council of Australian Governments and other appropriate forums to ensure a national land-use planning regime is put in place near airports and under flight paths to avoid noise-sensitive developments being located in these areas and to protect communities from excessive levels of aircraft noise. This initiative is also welcomed.