

Fairfield City Council.

Response to

**Towards a National Aviation Policy Statement
Issues paper April 2008**



24th June 2008

Closing date for submissions 27th June 2008

Fairfield City Council considered the content of the "Issues paper April 2008 – Towards a National Aviation Policy Statement" at its meeting of 10th June 2008.

Overall the Council is supportive of the Policy Statement as the starting point for further discussion on this important matter. A number of matters need to be included in the future Green paper due for release in late 2008.

The matters of interest to Council have been commented upon in the context of each of the major sections contained within the Policy Statement to make comments as relevant and easy to follow as possible.

Should additional clarification be required on any matter please contact the writer, Mr Brian Long, Senior Policy Advisor environment and Sustainability, City Outcomes Department, Fairfield City Council on 97250857 or blong@fairfieldcity.nsw.gov.au

1. The Australia Aviation Industry

Issue: How might access to Australian destinations outside the four major gateways of Sydney, Brisbane, Melbourne or Perth be increased? What role could State governments and communities have in attracting foreign and Australian airlines to Australia's smaller international airports?

Council's Response:

Before making any judgement about utilizing destinations other than the existing major airports, the Government should carefully consider future air cargo aviation trends and its impact on terminal capacity. Discussion on whether larger cargo dedicated planes to increase cargo capacity will be viable for the major airports much the same way as is happening with passenger planes should be included.

The movement of air cargo to regional centres, including Badgerys Creek airport, will require additional supporting infrastructure, assessment of environmental impacts, assessment of the impact on the potential for development of land adjacent to airport sites and the potential for widespread traffic congestion. These impacts will need to be considered in consultation with local communities and local Government.

Issue: Should Australia continue to pursue an "open-cargo" policy for dedicated cargo services? What cost-effective strategies could be employed to avoid delays in the transport of time-sensitive air freight?

Council's Response:

An open cargo policy could be supported however the impact of these operations on local communities needs close assessment, particularly in built up urban areas. General aviation is using older style aircraft which are not environmentally efficient. They are noisy and inefficient resulting in higher fuel use and the emission of GHG.

Adequate controls are required to manage these risks and to update inefficient aircraft.

Issue: How might existing Australian airport infrastructure best adapt to the challenge of processing large influxes of passengers?

Council's Response:

Airline operators and operators of local airports have to adopt a holistic approach. New and upgraded land transport systems are required to ensure passenger movements can be facilitated efficiently and effectively. Total reliance on carbon based transport systems is not acceptable. Land transport to Sydney Airport is currently unsustainable and significant public transport is required to manage passenger and freight movement.

Issue: Are additional measures required to ensure the continued safe operation of ageing aircraft?

Council's Response:

Regulations are required that maintain safety for passengers and residents surrounding airports including secondary airports.

Aging aircraft need to be phase out by requiring compliance with fuel consumptions standards, emission requirements and noise requirements. This would include inclusion of appropriate Flight Tracker instruments to help management noise related issues.

2 Aviation Infrastructure

Issue: Airport planning and development

Council's Response:

The mechanism for controlling the impact from airports upon development and for future development to impact upon airport operations are inadequate.

A greater level of responsibility should be placed upon the airport operators to provide more data about airport operations and the potential impact upon development.

Publication of information on the impacts of noise, using methods other than ANEF, should be mandatory.

Additional work is required to provide Councils and the community with access to information on sensitive zones and the chart of prescribed airspace.

Issue: Could the regulatory regime better facilitate genuine long-term co-operation between airport operator companies and state and local governments on land use planning?

The regulatory regime could be improved through publication of data on airport operations. Matters including height restrictions, fly zones, Obstacle Limitation Surfaces, Pans- Ops, controlled activity and sensitive zones should all be available through transparent processes.

Issue: How can we better integrate investment on airports with the funding and construction of improved road and rail links to and from our airports

Council's Response:

A national infrastructure development fund integrated with a regional transport plan would need to be developed, in concert with State, Federal and local Governments, to ensure the transport system to/from the airport site is thoroughly developed and funded. The developer of the airport (operator/owner) should not only be responsible to just within the airport and should be made accountable for external impacts such as transport and the environment on the surrounding area. These impacts should not be borne by local Government or the local community.

The potential for an air freight tax on goods to help recoup the cost of infrastructure development could be discussed further.

Issue: What mechanisms might be used to ensure an effective ongoing dialogue between airport operators and their local communities?

Council's Response:

The establishment of local airport community consultation forums should be reviewed.

Issue: How can the mechanisms for guiding development around airports be improved to ensure potential issues from aircraft noise are fully addressed in planning?

Council's Response:

The regulatory regime could be improved through publication of data on airport operations. Matters including height restrictions for structures, fly zones, Obstacle Limitation Surfaces, Pans- Ops, controlled activity and sensitive zones should all be available through transparent processes.

A system that required airport operators to maintain regular contact with Local Councils within a designated impact zone would be useful and allow local mechanism to be established.

Issue: How can the protection of the communities around airports from undue aircraft noise best be addressed as demand for services continues to grow?

Council's Response:

The establishment of enforceable fly neighbourly guidelines should be established. Airports within a designated impact zone of urban development must be required to change from a consultation approach to a management approach. New systems should be established that place the responsibility for reducing aircraft noise on the operator and not the community. A Flight Tracker System to monitor noise impacts should be mandatory for airports within a designated impact zone.

Issue: What practical steps can the aviation industry take right now to reduce greenhouse gas emissions? Are carbon offset schemes enough?

Council's Response:

Currently aviation is managing emissions generated by aircraft operation and on airport operations. The industry generates significant off airport activity and the operator should be responsible for managing or contributing to the management of these emissions. These include road transport to move large numbers of passengers and freight to and from the airport site.

Issue: Given the international nature of aviation, what opportunities are there to minimize greenhouse emissions and trade emission permits through emission trading schemes?

Council's Response:

Under utilisation of capacity is a problem for the industry. Aircraft flying under capacity increase the emissions per tonne of cargo per kilometre travelled. This spare capacity is an area that operators should be prepared to examine in addition to emission trading schemes.

Systems to monitor flights that occur with spare capacity should be put in place. Airlines should be required to offer access to spare capacity to other carriers or penalties should be imposed. Every effort should be made to reduce aircraft kilometres travelled under maximum capacity.

3 Aviation Safety

Issue: How can CSAS strengthen the way it relates to industry while meeting community expectations as a firm regulator.

Council's Response:

Casa should be provided with a complaints management system that is transparent and enforceable. Currently complaints about aircraft noise are not dealt with in a satisfactory manner.

4 Customer and Community protection

Issue: Could the ANEF system be improved or be supplemented by other planning tools to better explain the impact of aircraft noise? Should State and local governments play a greater role in aircraft noise management? What should be the responsibilities of airports?

Council's Response:

The ANEF system could be improved by replacing the scheme with one which is more readily understood by the community.

Airports should be responsible for managing and enforcing noise requirements and breaches of local conditions. The establishment of enforceable fly neighbourly guidelines should be established. Airports within a designated impact zone of urban development must be required to change from a consultation approach to management approach. New systems should be established that place the responsibility for reducing aircraft noise on the operator and not the community. A Flight Tracker System to monitor noise impacts should be mandatory for airports within a designated impact zone. This would include Bankstown Airport.

Issue : How effective are the current noise enquiry and noise complaint services? Are there more effective ways to deal with people's complaints and requests for information? Can the services be better provided?

Council's Response:

The current arrangements are completely ineffective and need urgent overhaul. See comments above in relation to noise management.

Issue: Are the current Transport Standards adequate to ensure the removal of discrimination from air travel?

Council's Response:

The current standard makes provision to ensure the removal of discrimination from air travel on big aircrafts. Currently small aircrafts are exempted from the Disability Transport Standards.

A small aircraft is an aircraft with less than 30 seats for the carriage of passengers (section 1.17, division 1.24 of the Disability Standards for Accessible Transport Amendments 2004 (No. 2).

This exemption should be discussed with a view to having the exemption removed or amended.

Issue: Are there recommendations arising from the recent Transport Standards Review that might be implemented to improve services for people with a disability?

Council's Response:

The Transport Standards Review recommends that there should be clear suggestions provided to operators and providers on how to meet outcomes in the Guidelines that accompany the Transport Standards. It also adds that it should give a clear idea to consumers of what they can expect in view of the 30 years implementation schedule.

Issue: Are current complaint and compliance mechanisms effective?

Council's Response:

The complaints mechanism under the Discrimination and disability Act (DDA) is not enforced unless a complaint is lodge to the Human Rights and Equal Opportunity Commission (HREOC) and the conciliation process and or court proceedings takes place. Complainants need to demonstrate that they have been discriminated against by an operator or service provider. After the introduction of the Transport Standards, however, consumers need only show that a provider has failed to comply with the standards as opposed to having to prove discrimination. This reduces the burden of proof from the consumer. Recent comments by the airlines suggest further discussion would be appropriate.

5 Aviation Security

No issues for comment.