

Hume City Council

**Submission to the
National Aviation Policy statement
White Paper**

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Introduction:

The aviation industry is one of the key drivers of the local economy in Hume City. Melbourne International Airport, which is located wholly within Hume City, employs more than 12,500 people directly and with a large amount of investment planned in the coming years this will increase significantly.

The airport is also one of the key planks in the strategy to diversify the local economy. With a strong tradition of manufacturing in Melbourne's north there is a real need to think about the future industries that will occupy the region.

Many cities worldwide have experienced that growth in knowledge sector employment has been strengthened by the presence of an international airport within their region. Airports are no longer just a key piece of transport infrastructure; they are becoming destinations in their own right and are becoming 'airport cities'.

Hume City Council works extremely well with the Melbourne Airport Corporation and understands the need to protect this vital piece of infrastructure, and economic driver, from inappropriate neighbouring land uses that would threaten the viability of the airport operations.

This submission picks up on many of the issues outlined in the issues paper however does not pick up on all of the issues as many are outside the realm of responsibility of local government.

The submission is structured to address the questions as raised within the issues paper and therefore the numbering aligns with the issues paper.

1. The Australian aviation industry

1.1 *International Services*

- How will new routes, technology and business structures change the profile of Australia's aviation market? Given Australia's evolving aviation sector, to which markets should the Australian Government seek improved access?

The Victorian Government and Local Government's within Victoria have been endeavouring to create partnerships across countries throughout Asia and the Middle East to improve Australia's access to the Halal Food market.

The links between Australia and countries where halal products are favoured are strong and Australia's reputation in the food industry provides significant opportunities to create further partnerships through food exporting and direct foreign investment into Australia's food production industry. Maintaining, and improving, direct flights from these countries will enhance these opportunities even more.

With many of the Asian and middle eastern countries operating their own airline fleet and the links between passenger planes and the time sensitive nature of much of the freight it seems ideal to further links and open up new routes through the export food market and in particular the halal food markets.

Growing the regions and cargo

- 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?

One of the keys to success for the Melbourne International Airport is undoubtedly the ability to maintain the airport for use by larger commercial airliners and freighters and limiting any use of the airport from smaller commuter type planes.

The volume of flights into the major international airport in Melbourne can be increased if the above scenario is realised thereby limiting the need for a further airport within Melbourne.

- 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?

Access to major gateway airports could be significantly enhanced by comprehensive and well planned passenger and freight rail links. In particular, the rail linkage should not be seen as an end of line destination, but rather an important stop on regional and capital interconnection.

The capacity of major gateway airports to act as high level intermodal freight hubs is yet to be fully realised. The aggregation of logistics in these hubs can realise a number of efficiencies, particularly in the areas of customs and quarantine.

The continued development and diversification of Australian Airports into Airport Cities will be enhanced by the 'open cargo' policy.

Facilitation and border control

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

As previously highlighted by maintaining the integrity of operations at the major airports for larger commercial airliners and diverting any smaller commuter type air traffic to smaller regional airports or secondary airports in metropolitan areas further capacity will be realised at many of the Australian Airports.

Increasing the volume of air traffic at airports needs to be closely aligned with planning controls to ensure that the operations of the airport are not unduly affected by neighbouring, and conflicting, land uses.

The economic benefit of an international airport to a city or a region cannot be overstated and indeed further economic benefits should be realised from these types of activity centres. The integrated planning for the growth of the airport should be done in conjunction with neighbouring stakeholders including local government.

Local Government is now coming to the understanding of the role the airport and the Airport City is playing in the local economy and are very able to be engaged as meaningful partners in the development of the airport and the intensification of activity within these centres.

1.3 Key challenges – general aviation

- How can general aviation operators, particularly small businesses, establish viable business models that allow them to take advantage of current buoyant conditions in the aviation market? In particular, how do these businesses meet the increased cost of skilled labour and improve recruitment and retention of their skilled workforce?

One of the issues that has not been undertaken well, with the possible exception of Brisbane Airport, has been the clustering of businesses around key aviation centres. Within Victoria the supply chain for the airport is spread over a wide area thereby diluting any benefits gained through an aviation industry cluster around the airport.

The key component suppliers, manufacturers, training institutions and maintenance facilities should be engaged and encouraged to locate around the major airports. These centres will then have greater opportunities to promote themselves as centres of excellence and further engage young people to enter the industry.

Training could be conducted on-site and research facilities also housed in the area thereby benefiting the local area and the industry sector.

Many examples exist world-wide where this clustering of complementary businesses creates these world renowned centres. This is beginning to happen around airports and Brisbane's Aviation centre is a prime example.

The viability of small business operators, with a particular emphasis on recruitment and retention, can be enhanced through the provision of quality public transport linkages. This is particularly important considering growth of youth employment in the retail and hospitality sectors at airports.

- What role should all levels of government have in protecting secondary airport infrastructure and in providing for new infrastructure?

There is no doubt that ensuring safe and efficient access to the airport is a key to developing a well operating airport that can service the needs of travellers and business. There is a primary role for Government in funding key pieces of infrastructure that allow greater access to the key airport node and that also allow a greater flow of freight and transport to and from the airport.

While road infrastructure is often considered the most important consideration also needs to be given to the role of rail infrastructure in the airport environment. Not only can rail infrastructure provide public transport for the millions of passengers each year that fly, it can also provide an efficient and effective means of moving freight.

1.4 Addressing skills needs in the aviation industry

- What strategies should the industry adopt to attract, retain and plan for their future skills needs to remain competitive in a tight labour market, and how can these be improved?

This report previously highlighted the benefits that could be obtained through the encouragement of the development centres of excellence in and around the airports. Encouraging the aviation industry to cluster around key airports will not only create employment within those areas but also encourage supporting infrastructure to locate around that area as well. This supporting infrastructure will include training and education centres.

Many industries are facing the issue of attracting staff in this tight labour market. Many organisations have begun to explore the option of 'adopting a school' within their region to highlight the opportunities for young people seeking careers and to highlight the career pathways that can be followed in these organisations. The aviation industry needs to adopt strategies to promote careers within their sector and this must include engaging students and their parents.

The provision of quality public transport to airports would also provide a means of enabling airports to compete as preferred workplace destinations; that is, to behave as alternate central business districts. The development of airports as airport cities will encourage greater opportunities for, and diversity of, employment and the aviation industry needs to be in a position to capitalise on these opportunities.

- How do we ensure the industry remains internationally competitive in retaining key staff and in attracting new entrants to the workforce?

Covered above

- How should the Australian Government and industry work together to ensure the needs of the aviation industry are taken into account in its broader skills framework?

Covered above

- Are proposals such as a national industry run flying school to train flying instructors worth investigating and, if so, how might such a school operate?

Within a short distance of Melbourne International Airport there is already a fully functioning flight simulation centre, Ansett Flight Simulator, and it is through partnerships with organisations such as this and Kangan Batman TAFE in Broadmeadows that such a school should operate. This should all be undertaken as part of a broader cluster of industries that locate around the airport supporting the operations of the airport as previously highlighted.

2. Aviation infrastructure

2.1 Airport planning and development

- Are the planning and development mechanisms under the Airports Act working effectively?

Section 112 of the Airports Act 1996, specifically excludes the application of State/Territory laws to Part V of the Act (relating to the land use, planning and building controls). This section diminishes the ability of state and local government to adequately and strategically plan for their localities.

Section 112 explicitly provides airport operators with the 'shield of the crown' which allows the preparation and implementation of master plans, major development plans immune from state planning legislation. It is considered that this provides airport operators an unfair commercial advantage in relation to non-aeronautical development over competitors who develop land off-airport, which is subject to a full and transparent planning process. The 'shield of the crown' also prevents local government from comprehensively planning their localities and ensuring that the non-aeronautical development of airport land complements the surrounding area.

The preparation and implementation of Airport Master Plans should be subject to the same process involved in the planning of non-airport land.

Regulation 5.02 (2) of the Airports Regulations

Regulation 5.02 (2) of the Airports Regulations requires airport operators (where possible) to describe proposals for land use and related planning, zoning or development in an amount of detail equivalent applicable to the State and Territory where the airport is located in the preparation of Airport Master Plans.

In Victoria, the implementation of Regulation 5.02 (2) has led to the development of 'land use plans'. These plans are based on the relevant master plan and in accordance with Regulation 5.02 they utilise the terminology contained in the Victoria Planning Provisions. The fundamental difference however is that the preparation and implementation of the plan is not subject to the provisions and processes outlined in the Planning and Environment Act.

Instead, the implementation of the plan is based on an approval process involving the issue of an Operators Consent and Building Permits. The issue of an Operators Consent is subject to the discretion of the airport operator. There is no statutory requirement for the referral or notice of applications to parties outside of the airport or the consideration of any public comment received. Moreover, any decisions made by the airport operator on the issue of an operators consent are not subject to an independent review as provided in the Planning and Environment Act.

A further limitation with the non-aeronautical component of airport development is the lack of strategic justification for the designation of on airport 'zones'. Whilst regulation 5.02 (2) requires the airport operator to describe its vision for non-aeronautical development in terms consistent with the relevant State planning legislation, this does not extend to providing the necessary strategic basis for the designation of these zones.

Essentially, these zones can be, and are, defined in accordance with the airport operators objectives without regard to the planning objectives of the adjoining municipality or the State Government. This differs from the strategic justification that would normally have to be provided for the zoning of land off-airport. As such, the zones are not required to have regard to off-airport affects such as competing activities, impact on other activity centres and the movement of land uses away from strategically justified sites to on-airport sites.

Another key deficiency in the master plan consultation and approval process is the lack of provision for the public and independent review of the master plan before approval by the Minister. Whilst the Act provides for public submission to be made to a draft master plan there is no transparent process which reviews the submissions received. In addition, the Act does not provide for the Minister to reveal his/her consideration of issues raised or allow Councils or other parties make direct representations to the Minister.

This process sits in stark contrast to the Victorian Planning System which provides a process of independent public review of planning decisions. The lack of independent review also departs from the process leading to approval of Melbourne Airport Strategy, the predecessor to the current Melbourne Airport Master Plan which was subject to a full Environmental Impact Statement (EIS) under the Commonwealth Environment Protection (Impact of Proposals) Act 1974.

It is submitted that the current provisions of the Airports Act related to the preparation and approval of Airport Master Plans and Major Development Plans are inadequate. A review of the master plan consultation and approval process is required to establish an independent review of the master plans and submissions leading to their approval.

Whilst the Airports Act bestows a significant advantage to airport operators in freedom from state and local government controls, particularly in the planning area, this advantage can translate into a lack of regard for sustainable land transport issues. The continuing

development of car parking areas as an ancillary income source conflicts with broader government agendas that include reduced car dependence.

- How can we improve consultation with State and local authorities and with the community?

SEE ABOVE

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

SEE ABOVE

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

While much of this has been addressed previously in the submission it also needs to be highlighted that the funding of improved road and rail links needs to work from the perspective that a major airport is not an isolated geographic entity within a metropolitan area. It is a major and specialised activity centre that should be subject to the full inclusion of comprehensive public transport network planning. The issue of investment integration can be addressed within this overarching planning framework.

Non-aeronautical development on airport sites

- How should the potential commercial impact for off-airport competition be taken into account in planning on-airport non-aeronautical development?

The integration of airport planning and development with the prevailing planning system would facilitate the assessment of economic impact of non aeronautical development on surrounding areas.

It is important to recognise that the concept of economic impact is concerned with the assessment of how a new use may impact the ongoing operation of similar uses in the surrounding area. This allows an assessment to be made of the community benefit associated with the new use and whether the community would be better served by maintaining the existing situation or supporting the new use.

This is an established planning principle that is applied across the country. Making non-aeronautical development on airports subject to the same assessment process would not only create a level playing field between on and off airport uses it would also ensure that non aeronautical airport development will deliver a net community benefit.

Future airport needs

- How can future airport needs best be addressed, recognising the importance of airports as an element of the national economic infrastructure?

In reality, it is engagement with the planning system that ensures that the necessary supporting infrastructure is provided at, and to, each airport. This not only benefits local communities it has also ensures that the airport can operate efficiently and effectively and meet the expectations of airport users.

It is clear that the airports rely heavily on infrastructure of surrounding areas to survive and operate efficiently. Importantly their ongoing expansion is dependent upon the provision of the necessary supporting infrastructure. This is achieved through the comprehensive

planning of airports involving the engagement of local communities and all levels of government consistent with the broader framework set by a national aviation/airports policy and land use planning framework.

It is clear that there is a role of the land use planning system in both regulating and controlling development and more importantly ensuring that airport development is integrated into surrounding areas. Internationally it is common that major airports are required to comply with the relevant land use planning legislation and planning policy framework even if they are privately owned and operated.

The 'mainport' or Airport City Concept is becoming widespread and it is clear that the trend is for airports to develop not only as key transport interchanges involving the transfer of people and freight between different modes of transport but also as complementary centres of activity that support existing city centres rather than compete with them.

It is important that the provision of supporting activities such as retail is developed to support this activity, not to compete with existing city centres for the same activity. The current policy regime around airport planning and development is not equipped to deal with this phenomenon.

The Airport City concept reinforces the need for national and state governments to develop plans and strategies for the development of major airports so that they are able to grow and development in a manner which maximises their economic benefits and complements rather than competes with surrounding areas.

This can only be achieved through an integrated approach to planning in a true partnership with the local community and local government.

In the longer term the inability of airports to be planned in accordance with the local land use framework and broader state planning policy will likely impede the efficient development of airports and prevent the development of the necessary supporting infrastructure that underpins the operation of airports as they grow. This will not only cause issues for the airport operators but also for the local and regional economy.

- What are the current and future pressure points in relation to airport capacity?

Short term free parking has become a significant issue for users of Melbourne International Airport. Family and friends seeking to pick up a traveller from the airport are required to use the short term paid parking facility while they await the arrival of the plane. Many have started parking on the side of the major freeway servicing the airport and are currently causing a significant danger to themselves and other road users.

There is a need to provide free or reduced fee parking within the grounds of the airport where people can wait to pick up their passengers. If air travel grows as highlighted in the issues paper then this will exacerbate the situation unless a solution is found.

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

The issue of noise and the growing demand for services is covered later in this submission.

4. Customer and community protection – addressing the impacts of aviation

4.2 Aircraft noise

Key challenges

- 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?

It is considered that the ANEF system in combination with the Australian Standard AS2021 works well as the basis for the development of planning tools to control development around airports.

The Ultimate Capacity ANEF prepared for Melbourne Airport provides the basis for the planning controls around the airport which restrict the establishment of noise sensitive land uses in areas subject to the greatest level of noise exposure. This approach strikes the appropriate balance between the need to protect the 24 hour curfew free status of the airport and the expectations of the surrounding community to develop their land.

There would also be some benefit in reviewing AS2021 to bring the standard in line with contemporary land use planning descriptors and move away from describing uses as “acceptable” or “unacceptable” and more precisely stipulate what uses are permitted or prohibited.

It is acknowledged however that the ANEF system does not adequately communicate the potential effects of aircraft noise to existing or future residents. Other descriptors such as the N70 are useful but are not readily available especially at the time when potential residents are looking to rent or purchase in a noise affected area.

The Melbourne Airport Environs Strategy Plan was endorsed by the Victorian Parliament in 2003 and included the recommendation that other mechanisms be explored to communicate areas that may be affected by some level of aircraft noise.

It was suggested that Street Directories or similar could be used to widely identify such areas and encourage people to make further enquires and utilise such tools as the N70 or respite monitoring.

- Should emphasis be given to airport/community partnership approaches, for example, based on locally negotiated agreements rather than generic legislative approaches?

There is considerable scope for airport and community partnerships to be developed to better manage noise and other impacts of airport operations.

The use of noise abatement procedures has been relatively successful in limiting the amount of aircraft over flying noise sensitive areas and at noise sensitive times however there is a lack of mechanisms to ensure compliance with these procedures. Noise Abatement should be shared responsibility of government, airports and particularly the airport users.

Internationally there is experience of airlines (and pilots) working with the airport and the local community to reduce aircraft noise impacts. For example, the Manchester Airport Consultative Committee (MACC) has worked to minimise aircraft noise impacts through the development of a scheme to encourage aircraft to comply with noise abatement procedures.

This scheme is implemented by the airport and involves a combination of fines and the naming and shaming of airlines which do not follow correct flight tracks and abatement procedures. The airport also sponsors an award to those who demonstrate good performance. This strategy has significantly improved the amenity of surrounding areas. The strategy also involves the education of new airlines and pilots on the requirements and expectations of aircraft using the airport.

- Can techniques for sharing information on aircraft noise impact be further developed to improve the supply of information to potential property purchasers and other affected parties?

Please see above

- Which airports in Australia need to remain curfew free and under what conditions?

Melbourne Airport is strategically placed to remain a curfew free airport. It is well located to serve the growing urban area and is surrounded by large tracts of undeveloped land that is excluded from future development by State Planning Policy and the ANEP based airport environs planning controls.

It should however be acknowledged that the curfew free status of the airport comes at a cost to the local community through the impacts of noise (especially at night) and limitations on development. As such the maintenance of the curfew free status should be a partnership with the airport users taking some responsibility of minimising the impacts of 24 hour operation through compliance with noise abatement procedures.

Similarly, airports in conjunction with the Commonwealth could assist by regulating the types of aircraft that use the airport at night and mandating the phasing out of older aircraft. It is not appropriate that communities surrounding curfew free airports experience the effects of older noisier aircraft that use the airport at night to fit in curfew arrangements at other airports.

- Can operations at airports be better managed to ensure the community is protected while at the same time providing for night time access?

Please see above

- 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?

The current noise enquiry and noise complaint services are relatively effective in recording and monitoring noise complaints as they arise. There is room for improvement however in the detail of responses to noise complaints and use of the data collected from the noise complaint services to improve noise abatement procedures.

Currently there is little follow up on noise enquires which relate to an abnormal or unusual noise event associated with an aircraft. The noise enquiry services need to be better resourced to be able to match noise complaints to specific aircraft to provide more detailed responses to noise complaints and to analyse the data collected to improve noise abatement procedures and their enforcement.

Conclusion

This submission has covered many points and tried to address the areas where Hume City Council has experience in dealing with these types of issues. The airport and the associated uses are an icon within Hume City and provide a great range of employment for Victorians.

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