

13056-06

16 June 2008

The Secretary
Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
Canberra ACT 2601

Dear Sir/Madam

**ISSUES PAPER: TOWARDS A NATIONAL
AVIATION POLICY STATEMENT**

Thank you for the opportunity to comment on this Issues Paper. Marrickville Council has a particular interest in the activities Sydney Airport and welcomes the Issues Paper as a means of addressing a range of significant but often neglected strategic issues for the Airport. Council considered the Issues Paper at a meeting on 3 June 2008 and resolved to make the attached submission.

Marrickville Council represents a densely populated community of residents and workers adjacent to Sydney Airport, most of whom are affected by aircraft noise. Over many years, Council has opposed a number of Airport developments which have increased aircraft movements and associated noise impacts. In particular, Council has advocated the development of an alternative airport for Sydney and a *reduction* of impacts in the interim through capacity caps on Sydney Airport, curfew extension/enforcement and widening of noise insulation subsidies. Council has also opposed a number of Airport developments that have threatened to impose land traffic impacts and undue competition on Marrickville's commercial centres. Council would like to see greater emphasis of these critical issues within the Aviation Policy Issues Paper.

In addition to Council's submission, Council officers have raised two planning issues in relation to Sydney Airport. The first is the impact on urban development of the Airport's Obstacle Limitation Surfaces (OLS). The OLS limits apartment building heights in parts of the Council area, making it difficult for Council to meet mandatory residential dwelling targets set by the NSW Government. The OLS is in addition to a Ministerial Direction under the NSW Environmental Planning and Assessment Act 1979 that limits residential development in aircraft noise affected areas. The second issue is the NSW Government's requirement for retention of industrially zoned land, which aims to provide for a range of businesses that service key industries such as Sydney Airport. This prevents the residential rezoning of some industrial sites, further limiting Council's ability to meet its dwelling targets.

Further enquiries can be directed to Council's Transport Planner, Mr Kendall Banfield, on 9335 2179.

Yours faithfully

Candy Nay
General Manager

Encl.

**SUBMISSION BY MARRICKVILLE COUNCIL
IN RESPONSE TO PUBLIC EXHIBITION OF THE
ISSUES PAPER: TOWARDS A NATIONAL
AVIATION POLICY STATEMENT**

JUNE 2008

Marrickville Council raises the following issues in relation to the National Aviation Policy Statement Issues Paper:

1. ***Recognition of the nature and extent of existing impacts.*** Greater recognition in the Issues Paper should be given to the significant noise impacts that major airports like Sydney Airport impose on surrounding communities. Marrickville residents endure repetitive, irritating aircraft noise events on a daily basis, hampering a range of activities and contributing stress-related illnesses in the long-term. Council has maintained for some years that Sydney Airport's impact on Marrickville residents is unacceptable.
2. ***Development of an alternative airport for Sydney.*** Following from the above, Council sees development of an alternative airport for Sydney as a key action to address unacceptable aircraft noise impacts. It is noted in the discussion paper that Badgery's Creek has been ruled out as a potential site. Notwithstanding, Council would like to see greater recognition in the Issues Paper of the critical nature of this issue, coupled with a firm commitment that a suitable site, or set of sites, will be investigated.
3. ***Certainty in distribution of noise impacts.*** Council strongly agrees with the statement in the Issues Paper that communities (as well as airports) require certainty in the distribution of noise impacts. It is for this reason that Council continues to support the definition and implementation of key noise distribution measures through legislation. These measures include curfews, capacity caps, flight path distribution and noise insulation subsidies. Council is reassured by the statement in the Issues Paper that the Australian Government will not consider the relaxation of existing curfew arrangements at Sydney Airport. Council would like to see an extension of the curfew in the future, as well as stronger curfew enforcement.
4. ***Need for aircraft noise regulations.*** In the Issues Paper, it is noted that no aircraft noise regulations apply to Australian Airports other than a requirement to publish noise forecasts. Council sees this as a double standard, as most other urban land uses are subject to noise controls. This highlights the fact that national noise regulations are required, combined with rigorous enforcement. Such regulation will in the long-term help guide capacity reductions, curfew extensions, flight paths and noise insulation subsidies. It will also help to accelerate technological change toward quieter aircraft and suitable alternative transport modes such as fast trains.
5. ***Expanding noise insulation subsidies.*** This issue, not mentioned in the Issues Paper, deserves a serious discussion. Over the years, Council has received numerous community representations over the need to expand the existing noise insulation subsidy zone, as there are many residents outside this zone who suffer unacceptable impacts. These residents must either bear significant costs associated with compliance with aircraft noise insulation requirements or must continue to suffer the impacts if unable to install insulation on a voluntary basis. Council agrees with residents that there is a need to expand the zone covered by the subsidy, but responsibility lies with the Australian Government. Council also calls on the Government to re-introduce the levy to fund noise attenuation measures.
6. ***Improving information on noise impacts and handling of noise complaints.*** Whilst it is acknowledged that Sydney Airport provides information on aircraft noise impacts and provides complaints procedures, Council would like to see these improved. Sydney Airport could improve its explanation of the factors that impact on aircraft movements and how the Australian Noise Exposure Forecast (ANEF) is measured. Introduction of additional noise impact measures are welcomed if they assist with this explanation. Noise impact information could also be presented on a Local Government Area basis to assist the councils assess the impacts on their particular

council areas. Council would also like to see regular publishing of aircraft noise complaints, naturally subject to normal privacy provisions.

7. **Implications of ageing domestic fleet on aircraft noise impacts.** It is noted in the Issues Paper that the average age of the Australian domestic aircraft fleet is 30 years and ageing. Council is concerned that this may contribute to increased noise impacts over time, as older aircraft are in the main noisier than modern aircraft. The need to modernise the fleet in the interests of noise abatement should be noted in the Issues Paper.
8. **Support for improved dialogue between airports and councils/communities.** Council strongly supports an improved dialogue between Sydney Airport and Marrickville Council and its community. Lack of such a dialogue has been a significant issue for Council over many years. Council has, for example, recently raised issue with Sydney Airport over lack of prior notification of the Runway End Safety Area project. The concept of formal agreements on appropriate issues is supported by Council, although this should be in addition to (not instead of) legislative controls on critical issues such as curfews. Council would also like to be reassured that Sydney Airport has allocated sufficient staff and other resources to undertake consultation with surrounding councils and communities. For example, Council would like to see the currently temporary position of Sydney Airport land transport planner be made permanent so as to facilitate a partnership approach between Council and the Airport in implementing the Airport's Ground Travel Plan.
9. **Competition from commercial development at airports.** This has been a major concern for Council in relation to recent Major Development Plans for significant commercial floorspace expansions at Sydney Airport. Although some of the larger proposals have been abandoned for the moment, the Airport continues to incrementally expand its commercial floorspace, posing an economic threat some of Marrickville's traditional commercial centres. The need to limit major expansions of this nature should be recognised in the Issues Paper and commercial floorspace caps imposed to limit the detrimental impacts on surrounding communities. Airports should focus on their core business of providing air transport, with limited commercial uses ancillary to this.
10. **Safety of communities surrounding airports and compensation for accidents.** The Issues Paper discusses safety, but only in terms of aircraft passengers, not in terms of the tens of thousands of residents and workers in suburbs surrounding airports. These people are also at risk from aircraft crashes, and this needs to be acknowledged. Compensation for 'third parties', which includes surrounding communities, should also be covered by appropriate legislation and other regulations.
11. **Mandatory greenhouse emission caps and planning for peak oil.** Council is pleased to see this issue has been included in the Issues Paper, and is heartened to note that the industry is moving toward voluntary standards. Council would however like to see these standards become mandatory in the future. Council notes with some concern that the issue of peak oil is not mentioned in the Issues Paper. Peak oil is likely to become a significant issue for the aviation industry in the future, as rising oil prices result in rising air fares, suppressing air travel demand. Note that in 2007 Marrickville Council recognised this issue and has signed an Oil Depletion Protocol that commits Council to a voluntary annual reduction in fuel use.
12. **Minimising impact of security measures on access around airports.** The need for improved security in and around airports is recognised and supported. However, improved security should not occur at the expense of walking and cycling access to, through and around airports. Council is keen to keep access open to promote sustainable and active transport in and around Sydney Airport.
13. **Council reaffirms its commitment to State and local planning controls over airport land.**
14. **Council is opposed to further privatisation of airports in Australia.**
15. **Council does not support the renewal of the Sydney Airport Corporation Limited (SACL) lease.**