



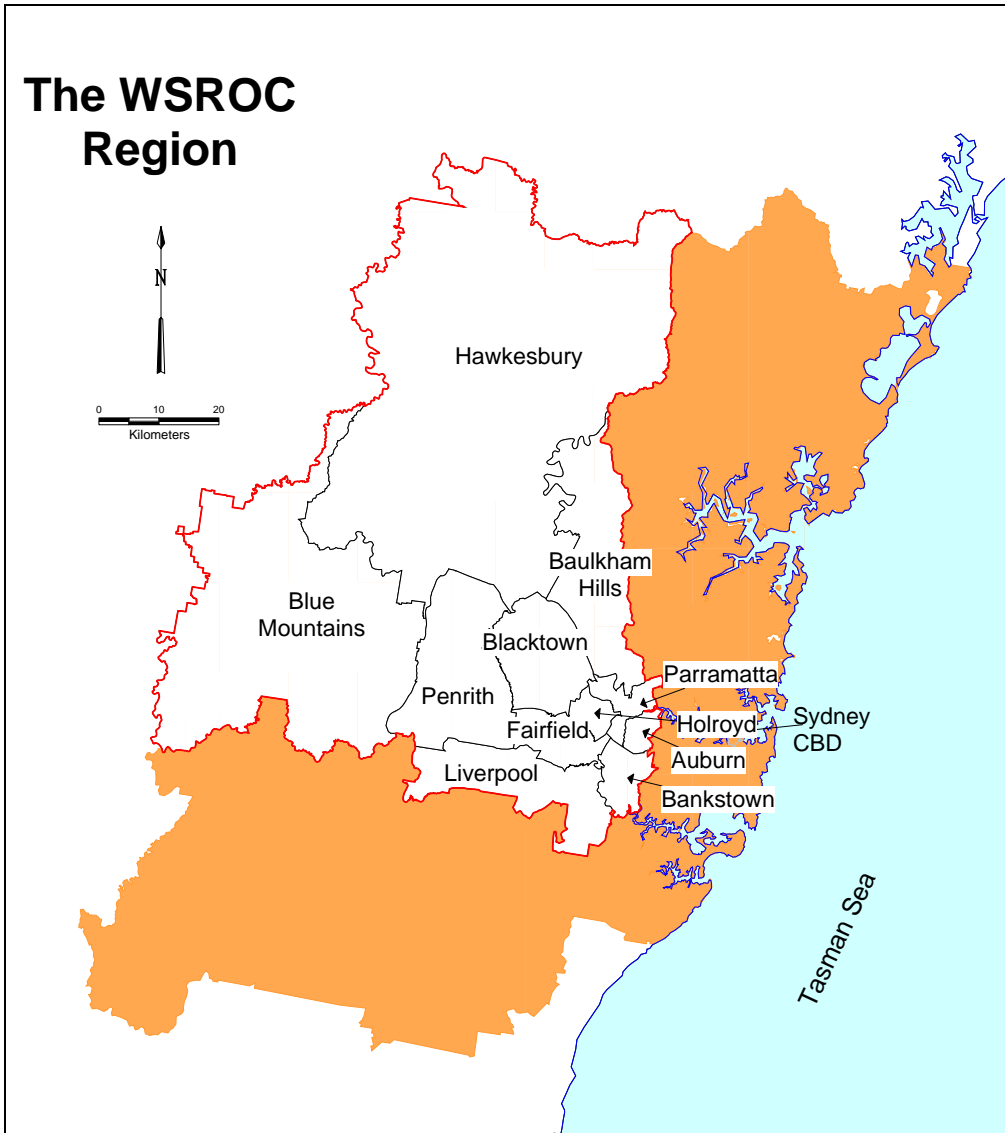
**Submission to the Department
of Infrastructure, Transport,
Regional Development and
Local Government**

**Towards a National Aviation
Policy Statement**

July 2008

Prepared by the

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SUBMISSION: TOWARDS A NATIONAL AVIATION POLICY STATEMENT

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SUBMISSION: TOWARDS A NATIONAL AVIATION POLICY STATEMENT

1. INTRODUCTION AND SUMMARY

WSROC is pleased to have an opportunity to respond to the *Towards a National Aviation Policy Statement* issues paper released by the Minister for Infrastructure, Transport, Regional Development and Local Government in April 2008.

Since 1997 WSROC's position has been consistent: there should be no development of additional aviation infrastructure, including a second airport or expansion of existing airports, anywhere in the Sydney basin. WSROC and the majority of its member councils have developed this view because of concerns over the major impacts a second airport would have on the air quality of the region, as well as on other aspects of the environment such as water quality and biodiversity. In particular, a second airport would have major noise and other impacts on the amenity of suburbs surrounding the proposed site.

WSROC is therefore pleased that the Issues Paper reiterates the new Federal Government's commitment that it does not support building an airport at Badgerys Creek. However, this statement needs to be strengthened and turned into formal policy commitments that an airport will never be built at this site and that the land at Badgerys Creek will be properly disposed of and put to other uses. Only then will the Federal Government's intention, as expressed in the Issues Paper, become a certainty.

In addition, further assurances are needed that there will be no other airport site nominated or further expansion of airport infrastructure contemplated within the Sydney basin. It is also important that the Federal Government consult closely with all councils in the region regarding the alternative uses for the Badgerys Creek site. Finally, it is WSROC's view that a national aviation policy should only be developed as part of a comprehensive national transport policy in which the development of a 21st century high-speed rail network is an essential component.

The comments provided in this submission broadly follow the format of the issues paper. This submission should be read in conjunction with the individual responses of WSROC member councils as well as the response prepared by the Western Sydney Alliance, elements of which have been reflected in the WSROC submission.

2. RECOMMENDATIONS

2.1 Proposed Second Sydney Airport

1. *The Federal Government should formally abandon the Badgerys Creek site without delay and incorporate such a commitment in the National Aviation Policy Statement.*
2. *This commitment should subsequently be developed to include:*
 - *Identification of an alternative site or sites outside the Sydney basin but within a band 200 to 300 kms from Sydney;*
 - *Commitment to develop appropriate ground-based infrastructure to service the alternative airport complemented by a commitment to the substantial development of the national rail network as part of a comprehensive national transport policy (see further recommendations under 2.4 below);*
 - *Incorporation of the national aviation policy within this broader national transport policy (see further recommendations under 2.3 below);*
 - *The appointment of a task force involving Federal, State and Local Government to resolve the future use of the Badgerys Creek airport site.*
3. *Further assurances should be provided by the Federal Government that no other airport site will be nominated or further expansion of airport infrastructure allowed within the Sydney basin.*

2.2 Environmental Impacts

4. *Subject to further consideration of the Garnaut Report, an emissions trading scheme including transport should be developed. The likely resulting increase in the cost of air transport should reinforce the need to consider aviation policy as part of a broader national transport policy and, in particular, the development of the rail network as an alternative option for domestic transport (see further recommendations under 2.3 and 2.4 below).*
5. *The national aviation policy should address the issue of the local impacts of aviation and other emissions near to airports and the environmental impacts arising from airports and associated ground-based transport infrastructure, including impacts on biodiversity, salinity and water quality, particularly in relation to site selection for new airports or the expansion of existing facilities.*
6. *All noise restrictions currently in operation at airports within the Sydney basin should be maintained as a minimum and the ANEF system comprehensively re-evaluated in light of concerns over its operation.*

2.3 National Aviation Policy

7. *The national aviation policy should form an integral part of a comprehensive national transport policy encompassing all modes of transport (road, rail, air and sea) as well as both freight and passenger transport. This policy should also cover international, interstate, regional and urban transport as well as feeder services to all significant transport hubs.*
8. *The development of the national transport policy should involve Infrastructure Australia, the Major Cities Unit and Regional Development Australia and encompass extensive consultations with all levels of Government and other key stakeholders.*

9. *The national aviation policy should specifically involve development of a more consistent framework for consultation with State and Local Government regarding aviation and all aspects of airport infrastructure, including ground transport infrastructure.*
10. *A core component of the national transport policy should be a major redevelopment of Australia's existing national, regional and urban networks, combined with the development of alternative transport options such as a high speed rail network (see further recommendations under 2.4 below).*

2.4 Alternative Transport Options

11. *The proposed national transport policy should incorporate strategies to develop a national high speed rail network as well as upgrades to existing networks.*
12. *In the first instance this should involve development of a "moderately fast speed" rail network servicing the more densely populated areas of NSW. This network should link major centres such as Sydney, the Central Coast, Newcastle, Canberra, Goulburn and Wollongong with each other as well as with the existing airport and any future airport built outside the Sydney basin, in addition to providing an alternative north-south link through Greater Western Sydney.*

3. COMMENTS IN RESPONSE TO THE ISSUES PAPER

3.1 The Australian Aviation Industry

WSROC acknowledges that growth, particularly in international aviation and airfreight, has major implications for national aviation policy, though short term impacts such as the current economic downturn and longer term impacts of both climate change (including responses such as the proposed emissions trading scheme) and increases in fuel costs are likely to slow the rate of this growth.

It is also acknowledged that Sydney is an attractive destination for much of this international air traffic in both passengers and freight because of its unique role as Sydney's only global city, the fact that it is Australia's largest city and its central location in the middle of the relatively densely populated east coast of Australia. Some expansion in airport capacity to service Sydney is therefore likely to be required.

However, for the reasons mentioned in the introduction and discussed in more detail elsewhere in this submission, WSROC strongly opposes the construction of any such facility within Sydney. WSROC believes any expansion in airport infrastructure must occur outside the Sydney basin; if a second airport is to be constructed it must be located within a band 200 to 300 km from Sydney.

This could involve either expansion of an existing airport (for example, Canberra or Newcastle) or development of a new airport (for example at Goulburn) though it should be noted WSROC does not have a preferred location. Such a facility would require extensive investment in land based transport links and, in particular, construction of new rail infrastructure to service the proposed airport.

3.2 Aviation Infrastructure and Future Airport Needs

WSROC notes the comments on page 10 of the issues paper regarding the extent to which developments in the industry have driven changes to airport infrastructure in the absence of a comprehensive aviation strategy.

In response to comments on page 11, WSROC strongly supports the development of a more consistent framework for consultation with State and Local Government regarding aviation and airport infrastructure as part of the Commonwealth's re-engagement in planning issues particularly in urban areas through Infrastructure Australia, the Major Cities Unit and Regional Development Australia.

These consultations should include discussion of ground transport infrastructure both in relation to specific airports and in the context of long term planning of land based alternatives including, in particular, rail transport. It is important that airports not be developed in isolation for consideration of these issues.

As noted earlier, WSROC strongly endorses the statement on page 12 that "the Australian Government does not support building an airport at Badgerys Creek", however, it is unfortunate that this is the only comment on this matter contained in the Issues Paper. As such, it does not amount to a formal statement of abandonment of Badgerys Creek as an airport site. Indeed, it is very concerning that the wording of this comment may have encouraged some transport lobbyists and business interest groups to call on the Federal Government to revive the Badgerys Creek airport proposal.

WSROC urges the Government to formally abandon the Badgerys Creek site without delay and to incorporate such a statement in the National Aviation Policy Statement.

This commitment should subsequently be developed to include:

- Identification of an alternative site or sites outside the Sydney basin but within 200 to 300 kms of Sydney;
- Commitment to develop appropriate ground-based infrastructure to service the alternative airport complemented by a commitment to the substantial development of the national rail network as part of a comprehensive national transport policy.
- Incorporation of the national aviation policy within this broader national transport policy; and
- The appointment of a task force involving Federal, State and Local Government to resolve the future use of the Badgerys Creek airport site.

3.3 Customer and Community protection – addressing the impacts of aviation

- *Aviation Emissions and Climate Change*

WSROC broadly supports the concerns expressed in the issues paper regarding these issues. At the time of writing, Prof Ross Garnaut was about to release the draft climate change report detailing his proposal for an emissions trading scheme. It is understood that Prof Garnaut has mentioned the inclusion of transport in emissions trading, which will obviously have major implications for national aviation policy.

WSROC supports in principle the development of an emissions trading scheme, including transport, but will need more time to study the Garnaut report and its implications. It is likely, however, that the combination of the introduction of an emissions trading scheme combined with increased fuel prices and other environmental measures will significantly increase the cost of air transport. This reinforces the need to consider aviation policy as part of a broader national transport policy and, in particular, the development of the rail network as an alternative option for domestic transport.

The issues paper does not address the issue of the local impacts of aviation emissions near to airports or the associated emissions or other environmental impacts arising from ground-based transport servicing airports. These are very significant and should be addressed in the national aviation policy statement. They also provide a strong argument for the greater use of public transport and rail freight both to service individual airports and as an alternative to aviation.

For example, Western Sydney's air quality is already comprised by its heavy dependence on private car use as well as topography which results in the region "trapping" and retaining air pollution generated in other parts of the city. The proposed Badgerys Creek airport site is also opposed because it would have major impacts on biodiversity, salinity and water quality in the region. Consideration of these issues should be incorporated in the National Aviation Policy in the context of site selection for any new airports.

- *Airport Noise*

WSROC supports the commitment that the government “will not consider any relaxation of these [current airport] noise restrictions”. WSROC believes that all noise restrictions currently in operation at airports within the Sydney basin should be maintained as a minimum, consistent with the organisation’s overall opposition to expansion of airport activity within the basin.

The issue of aircraft noise is also central to the region’s overwhelming opposition to the proposition that an airport be built at Badgerys Creek. The debacle surrounding the development of the third runway at Kingsford Smith Airport in the 1990s demonstrated the shortcomings of reliance on the ANEF system to predict the impact of aircraft noise and was justifiably the basis of considerable concern over its use in planning the proposed Badgerys Creek airport.

There would therefore appear to be strong argument to comprehensively re-evaluate the ANEF system. Site selection for any additional airport to meet Sydney’s needs therefore should take this into account and any such airport should be located not only well outside the Sydney basin but also as far as practicable away from any other significant population concentrations.

4. CONCLUSION – THE NEED FOR ALTERNATIVE TRANSPORT OPTIONS

WSROC reiterates its opposition to the construction of a second airport at Badgerys Creek or any other expansion of aviation infrastructure in Sydney. Any additional airport to serve Sydney should be built 200 to 300 kms outside the Sydney basin. In addition and complementary to the construction of such an airport, WSROC believes that alternative transport options and, in particular the rail network, needs to be redeveloped and substantially expanded as discussed below.

As a first step, WSROC strongly believes that national aviation policy must be developed within the context of a broader transport national policy encompassing all modes of transport (road, rail, air and sea) as well as both freight and passenger transport. This policy should also cover international, interstate, regional and urban transport as well as feeder services to all significant transport hubs.

A core component of this national transport policy must be a major re-development of Australia's existing national, regional and urban networks, combined with the development of a high speed rail network. The current investments under Auslink are welcome but in addressing the enormous backlogs in rail infrastructure investment and overcoming the deficiencies of an antiquated 19th century rail network, they represent only the first step in the creation of a proper national system of 21st century railways.

Previous attempts to develop a high speed rail strategy have foundered for a number of reasons, including concerns at the scale of investment required combined with Australia's relatively low density and number of significant population concentrations. It is unlikely that Australia could move in a single stage from its current very slow passenger rail networks (particularly in NSW) to TGV-style services and speeds. However, it would be feasible and cost effective to develop a "moderately fast speed" rail network linking, in the first instance, the more densely populated areas of NSW.

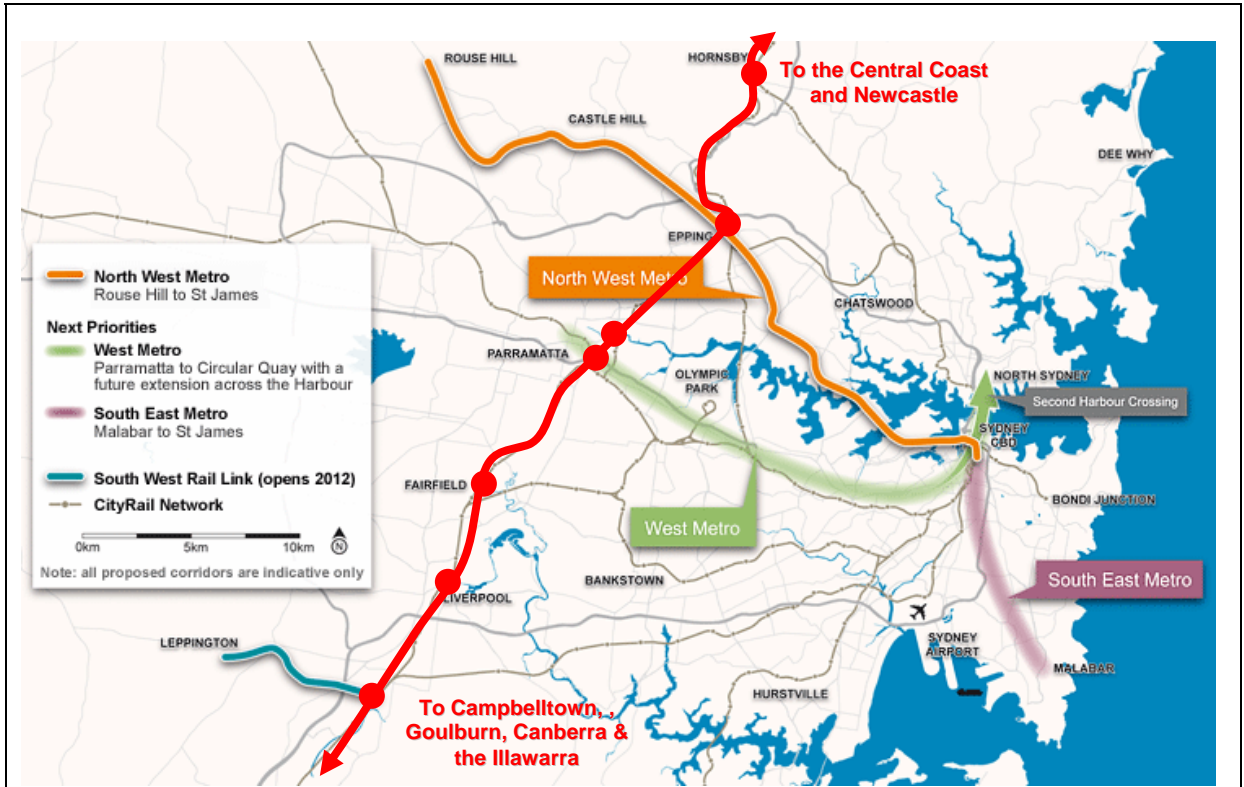
Such a rail system could serve several purposes. For example, it could link major centres such as Sydney (including Western Sydney), the Central Coast, Newcastle, Canberra, Goulburn and Wollongong with each other as well as with the existing airport and any future airport built outside the Sydney basin. This network would provide medium-distance regional services thus making a significant contribution to an overall reduction in the demand for aviation, as well as providing outer suburban commuter services and airport to city links.

Provided it was properly integrated with appropriately designed interchanges, it would also complement both the existing CityRail network as well as the State Government's planned North-West Metro and proposed Western Metro. These Metros could also obviate the need for the high speed line to be constructed into the heart of the Sydney CBD by providing options for high-speed links from interchanges in Western Sydney.

Routing the high speed rail line through Western Sydney would also provide a much-needed north-south link through the region (see diagram below), linking the existing and proposed radial CityRail and Metro lines and major regional centres.

In summary, the development of a National Aviation Policy is strongly supported but this must be integrated within a wider, comprehensive National Transport Policy which supports the development of major new rail infrastructure. Another core element of this policy must be the formal abandonment of any proposal for a second airport in Sydney, at Badgerys Creek or elsewhere.

Diagram: Proposed High-Speed Rail Link Through Sydney



Proposed high-speed rail link shown in red (indicative route and interchanges only).

Base map from State Government SydneyLink website.