



***Town and Country Planning Association
Incorporated***

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Registration no. A0031095J

<http://www.tcpa.org.au/>

10 March 2023

Aviation White Paper Branch
Domestic Aviation & Reform Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601
Email: aviationwhitepaper@infrastructure.gov.au

Dear Sir/Madam

***Aviation White Paper: Terms of Reference
Submission by the Town and Country Planning Association Inc.***

The Town and Country Planning Association (TCPA) advocates integrated planning of land use and transport for ecological sustainability and a healthy living environment. The T CPA is a non-profit public organisation established in Victoria in 1914 and is independent of any party political organisation.

Please find on the following pages the T CPA's submission in response to the *Aviation White Paper: Terms of Reference* released on 7 February 2023. An additional reference paper, *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, is also attached separately – unfortunately, the T CPA has access to a PDF version only.

This White Paper is of considerable interest to the T CPA. Its submission identifies areas of interest that the T CPA would like to discuss further and present at the proposed roundtables proposed in March and would anticipate making submissions responding to the Green Paper later in 2023.

Please contact me directly for advice on who would represent the T CPA at those roundtable discussions, but, at a minimum, it would involve Ms Marianne Richards, President, and myself, with one or two other T CPA Committee members as appropriate.

Yours sincerely

Peter Hill
Honorary Secretary
Town and Country Planning Association Inc.
Ph: 0402 132 633
Email: secretary@tcpa.org.au

Att: *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (VTAG, 28 March 2022)



About the T CPA

Established in Victoria in 1914, the Town and Country Planning Association Inc. (TCPA) is a politically independent, not-for-profit association incorporated in 1994 and is independent of any party political organisation. Its members and supporters represent a wide cross-section of land use and transport planning expertise and interests.

The T CPA is fortunate in that its committee includes three retirees who, between them, have around many decades of experience in airport planning and policy and others who have worked in the broader context of integrated land use and transport planning.

To learn more about the T CPA visit: <https://tcpa.org.au/about-us/>

Considerations in preparing this submission

In addition to the *Aviation White Paper: Terms of Reference* (Terms of Reference), the T CPA has also considered the following:

- *National Aviation Policy White Paper – Flight Path to the Future* (Australian Government, December 2009)
https://www.infrastructure.gov.au/sites/default/files/migrated/aviation/publications/files/Aviation_White_Paper_final.pdf
- *Airports Act 1996*
- T CPA submission to the House of Representatives Standing Committee on Infrastructure, Transport and Cities
Inquiry into the Australian Government’s role in the development of cities in 2017
<https://tcpa.org.au/wp-content/uploads/2014/09/Submission-to-SCITC-Aust-Government-role-in-cities-TCPA.pdf>
- T CPA submission to the *Suburban Rail Link Project Environment Effects Statement and Planning Scheme Amendment* (16 December 2021).
<https://tcpa.org.au/wp-content/uploads/2022/07/TCPA-Submission-to-SRL-EES-and-letter.pdf>
<https://tcpa.org.au/wp-content/uploads/2022/07/TCPA-Presentation-to-SRL-IAC-Speaking-notes-2-May-2022-FINAL-as-delivered.pdf>
- T CPA submission to the Melbourne Airport Master Plan 2022 and Third Runway MDP
<https://tcpa.org.au/wp-content/uploads/2023/03/TCPA-Submission-to-Melbourne-Airport-Master-Plan-and-3rd-runway-and-letter-Draft.pdf>
- T CPA reports and papers on regional growth – available at
<https://tcpa.org.au/publications/tcpa-reports/>
 - *A Decentralisation Strategy for Australia*
 - *Rail as a Catalyst for Regional Growth*
 - *High Speed Rail for Regional Growth*
- Victorian Transport Action Group (VTAG), *Adverse Effects of Melbourne Airport’s Runway Development on Community Health*, (28 March 2022) (*See separate PDF attachment*)

Key messages of this submission

This submission does not propose to address all detail of the Terms of Reference, but rather focus on any emerging issues of particular interest to the TCA which they currently appear to omit, namely:

- Need to update the 2008 Aviation White Paper
- Airport planning processes
- Regionalisation
- Events of national significance for the transport sector



- Achieving net zero carbon missions

Terms of Reference

The key messages in this submission do not neatly fit into each matter to outlined in the Terms of Reference. As with most matters related to integrated land use and transport planning, there is often overlap.

For convenience of referencing, the matters will be referred to in accordance with the following numbering.

- A. *Aviation’s role in economic development, trade and the visitor economy – general, domestic, regional and international aviation;*
- B. *How to maximise the aviation sector’s contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies;*
- C. *Changing aviation technologies and ways to position our policies, regulations and systems to encourage uptake and manufacturing of new, more efficient, transport technologies;*
- D. *Airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation;*
- E. *How to support and regenerate Australia’s general aviation sector;*
- F. *Future industry workforce skills and training requirements;*
- G. *Appropriate consumer protections and access to services;*
- H. *Maintaining fit-for-purpose aviation safety, air navigation and aviation security systems and service delivery agencies;*
- I. *The role of airlines and airports in supporting regional economies; and*
- J. *Other significant issues raised during the consultation process.*

The key messages addressed in this submission affect items A, B, C, D, I and J, above.

That said the TCPA is concerned at the use of the term “fit-for-purpose” in item H. Australia has a reputation for excellence in aviation safety etc. The use of terms such as “fit-for-purpose” in a national strategy or policy settings can imply a watering down of service quality and, therefore, national reputation.

Emerging issues

1. Need to update the 2008 Aviation White Paper

Need for a national approach to properly integrated land use and transport planning

Over the past decade the TCPA, like many transport and planning associations, has advocated for a national approach to integrated land use/population distribution and transport strategy. The TCPA believes that, without such an approach, transport mode-based strategies become almost meaningless.

There has been an increasing focus on regional development policy and regional alliances evolving over the last 15 years.

It will be important that the next national aviation strategy demonstrates that it understands the geography of these alliances and regions – regional cities now recognise the importance of being connected to each other (regardless of state borders) as well as to their nearest capital cities.



The Brisbane – Melbourne region, focus of the High Speed Rail initiative, is one where mode-specific transport polices need to recognise the role of aviation and other transport modes in contributing to **population distribution** as well as economic development, trade and visitor markets.

Airport planning and state and territory governments

The Victorian Government has taken significant steps to safeguard airports and ensure that planning for and around airports considers the potential safety and amenity impacts on surrounding communities, integration with Victoria's land based transport network and protection of airport operations.

Health issues

Health impacts of transport operations were not subject of detailed spatial research even 25 years ago. It has taken the research of academics like Distinguished Professor Billie Giles-Corti (RMIT University) working with geography researchers to start to apply a spatial dimension to chronic diseases and their causal links with transport related air and noise emissions.

In recognition of her work, in 2020 the TCPA awarded its Sir James Barrett Memorial Award medal to Distinguished Professor Giles-Corti.

<https://tcpa.org.au/sir-james-barrett-memorial-award-for-2020-presented-to-distinguished-professor-billie-giles-corti/>

2. Airport planning processes

Airport Master Planning

Melbourne's airports (including Melbourne, Avalon, Essendon and Moorabbin) and Victoria's RAAF Bases (Point Cook and East Sale) are important infrastructure assets, vital to the city's social connectivity and economic prosperity.

Victoria's many regional airports (including Ballarat, Bendigo, Hamilton, Latrobe Valley, Mildura, Mt Hotham and Portland) also make significant social and economic contributions to their regions and the State. Most of these airports have master plans and have ongoing airport infrastructure investment programs.

National Airport Safeguarding Framework (NASF) and aircraft noise impacts

Some TCPA members are also members of VTAG and have drawn our attention to a recent paper, *Adverse Effects of Melbourne Airport's Runway Development on Community Health*, (VTAG, 28 March 2022).

The paper outlines the 2018 findings of various studies undertaken by the World Health Organisation (WHO) identifying personal health impacts beyond sleep disturbance and general distraction used in the current Australian Noise Exposure Forecast (ANEF) System for modelling future aircraft noise impacts.

The newly identified impacts include noise distress and delay in cognitive development and the WHO has proposed critical noise levels (dB) that are lower than currently used to address transport related noise. VTAG notes that these are currently not addressed in the *National Airports Safeguarding Framework* (NASF) or its *Guideline A – Measures for Managing Impacts of Aircraft Noise* and recommends that they should now be addressed.

Airports and other transport projects

TCPA submission to the *Suburban Rail Link Project Environment Effects Statement and Planning Scheme Amendment* identified, amongst other matters, the conflict of the SRL stabling yard with crucial points in the flight paths (arrivals, departures and training circuits) at Moorabbin Airport. In this regard the submission addressed



- Provisions of Clause 18.02-7S – Airports and airfields of the Victoria Planning Provisions (VPP), particularly as it refers to Moorabbin Airport operations;
- The *National Airports Safeguarding Framework* and its associated Guidelines A – I;
- The *Moorabbin Airport Master Plan (2015)* and the *Preliminary Draft Moorabbin Airport Master Plan (2021)*; and
- Potential risk to the Stabling Facility resulting from an aircraft incident.

The TCPA noted that, while aircraft noise and protection of airspace were addressed, the EES had not addressed all aspects of the NASF, in particular its Principles and Guidelines C (wildlife strike), E (pilot lighting distraction) and G (Communication, navigation and surveillance)

The recent release of both the *Melbourne Airport Environs Safeguarding Standing Advisory Committee Part B Final Report* (November 2021) and the associated State Government Response, *Safeguarding Victoria's airports* (April 2022) reinforces the need for developments and airports to address NASF when considering developments on and in the vicinity of airports.

While mercifully rare, there have been three incidents in the vicinity of the stabling facility site since 2010 that should now trigger consideration of NASF *Guideline I: Managing the Risk in Public Safety Areas at the Ends of Runways* in both the SRL East EES and Moorabbin Airport's current master planning process.

- **June 2021** The pilot was seriously injured when his aircraft had been conducting circuit operations at Moorabbin Airport and collided with terrain approximately 1 km north of the airport at Heatherton – the Heatherton Sands site immediately to the north of the proposed facility.
- **June 2019** Two men walked away with minor injuries after their plane crashed into the Capital Golf Course in Heatherton, which is just to the north of the airport and south of the proposed stabling yard.
- **April 2010** 72-year-old pilot was trying to land his Piper Warrior craft when the plane clipped trees and landed at the Capital Golf Club course.

This created the opportunity for the SRL East project to undertake the extra consultations that the TCPA recommended in its submission and to ensure that it can fully address NASF – if acted upon quickly. Whether those consultations have occurred is not clear to the TCPA.

However, the TCPA remains concerned that no representative of the SRL proponents, the state transport or planning departments or local council had account for the interaction between these significant transport facilities. Neither Moorabbin Airport nor federal aviation agencies made submissions to the EES. Given that NASF places obligations on all levels of government and airport to remain vigilant and that failed in this instance, the National Aviation White Paper will need to review the operation of NASF and its associated intergovernmental arrangements.

Approval processes for federally leased airports are not consistent with those for other major transport initiatives around Australia

Except for Avalon Airport, federally leased airports in Victoria are subject to the *Airports Act 1996* and its associated approval processes. Avalon Airport and all other Victorian airports are subject to state environment and planning legislation and processes. Likewise, the proposed airport to Melbourne's south east as proposed in *Plan Melbourne 2017-2050* will also be subject to state processes, including independent review.

The Airports Act does not allow for a mandatory independent review process for airport developments, despite the success of the approach for the MAS.



This is a somewhat unique arrangement when compared to planning for other major transport infrastructure investments of state and national significance. Each of the following transport projects in Victoria has been subject to planning and environmental assessment independent review processes:

- Western Highway Duplication (various sections)
- North East Link
- Suburban Rail Loop Stage 1
- Port of Melbourne – Webb Dock EES
- Port of Melbourne – Channel Deepening Project (twice)
- Westgate Tunnel Project
- Melbourne Airport Rail Link (twice so far)

In none of the above cases was the project proponent expected to perform the role of independent reviewer that federally leased airports appear to play under the Airports Act 1996.

A collaborative approach is needed

The state and territory governments of Australia are legitimate and key stakeholders in protecting the amenity and health of their communities in hand with supporting future airport growth. State and territory governments were and remain key participants in the development of the agreed NASF and its incorporation in their planning systems, including in Victoria’s case, the *Victoria Planning Provisions (VPP)*.

Like the Victorian projects listed above, significant airport development projects, such as the additional runways at Brisbane and Melbourne Airports, deserve a similar collaborative approach to preparation and assessment of these strategic plans and projects and the benefits of an independent review.

3. Regionalisation

The TCPA partnered with the Rail Futures Institute Inc. and, in January 2022, released a discussion paper, *Rail as a Catalyst for Regional Growth*. The discussion paper considered the need to boost population growth and support social and economic development in Victoria’s regions:

- Potential population scenarios which might rebalance the relative sizes of regional and metropolitan populations, noting that even prior to COVID there was a trend to regional living and remote working which the pandemic has accelerated; and
- The roles of rail transport (including emerging faster rail systems) and other transport modes (including air).

While relating to rail networks, there are parallels to the aviation networks. Eight key topic emerged from the Discussion Paper, which will be addressed in the Final Report to be released in coming weeks:

- Leadership is needed to make the changes to boost regional growth
- Stronger planning guidelines and controls will be required
- Regional cities should be the locations for regional growth
- Scenarios for regional growth
- Urban growth in peri-urban areas¹
- Gaps in regional passenger services
- The regional rail network is an under-utilised asset
- Regional city railway stations/precincts as transport hubs.

¹ Peri-urban refers to “within 100 km od Melbourne’s CBD”.



The 2022 discussion paper and a summary are available at the TCPA website –
<https://tcpa.org.au/rail-as-a-catalyst-for-regional-growth/>

4. Events of national significance for the transport sector

The State of Victoria will be host for the 2026 Commonwealth Games, with a strong focus on regional Victoria. In a Commonwealth Games first, Victoria 2026 will introduce a new multi-city model bringing global sport to four regional hubs: Geelong, Bendigo, Ballarat and Gippsland. Each hub will have its own athlete village, and together they will deliver a 16-sport program in world-class regional sporting venues.

Similarly, Brisbane will host the 2032 Olympic Games. Both events will have implications for the national transport networks generally as well as for the aviation sector.

5. Achieving net zero carbon missions

Achieving net zero carbon emissions has to be a priority for the transport sector. It will be a challenge for the aviation sector and aircraft manufacturers, but like other modes the possibilities for alternative fuels are developing rapidly.

Pricing or policies should not be configured to promote air travel at the expense of other more sustainable modes of travel such as long-distance rail and should provide interchange facilities at airport terminals that encourage public transport transfers.

Certainly, Australia should not be going in the direction of an industry that deals in cut-price fares that encourage excessive cheap tourism that is ultimately a cost on the environment and the community.

TCPA wishes to be involved

This White Paper is of considerable interest to the TCPA. Its submission identifies areas of interest that the TCPA would like to discuss further and present at the proposed roundtables proposed in March and would anticipate making submissions responding to the Green Paper later in 2023.

END