

**Submission on Aviation White Paper
Terms of Reference**

to

**Department of Infrastructure, Transport,
Regional Development, Communications,
and the Arts**

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Table of Contents

About the Victorian Transport Action Group (VTAG)	2
VTAG Comment on the Aviation White Paper Terms of Reference	3
Aviation’s role in economic development, trade, and the visitor economy – general, domestic, regional, and international aviation.....	3
How to maximise the aviation sector’s contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies	3
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.	3
Appropriate consumer protections and access to services	5
The role of airlines and airports in supporting regional economies; and.....	5
VTAG Requests Involvement and Input into the Preparation of the Green Paper.....	5

About the Victorian Transport Action Group (VTAG)

This submission is made by the Victorian Transport Action Group (VTAG), an independent forum of transport experts that examines the challenges of transport in Victoria to offer practical and pragmatic solutions.

Members have a range of expertise across all modes of transport, planning, State and Local Government, IT and the environment, including past employment with Government, Government Agencies, the Department of Transport, VicRoads, transport consulting and academia. VTAG has an extensive network of connections in local government, planning and public transport that it can access for insights into the complexity of air and surface transport policies and issues and provide options for equitable, practical solutions.

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VTAG Comment on the Aviation White Paper Terms of Reference

VTAG agrees with the Terms of Reference and has provided preliminary comment and/or VTAG recommendations on five of the Terms of Reference's themes.

Aviation's role in economic development, trade, and the visitor economy – general, domestic, regional, and international aviation

VTAG members have expressed growing concern about the future of the aviation industry in Australia and its adverse impacts on growing transport emissions. While an efficient aviation industry with broad coverage across the country is vitally important for economic development, trade, and tourism; ad hoc and unplanned growth of the aviation industry can be detrimental to local economies and fail to meet the needs of various sectors and people.

With transport emissions, and especially aviation emissions, an increasing cause of rising carbon pollution across the country as people return to the skies post pandemic, serious consideration and coordination of transport planning needs to happen to encourage sustainable modes of travel and reduction of greenhouse impacts.

How to maximise the aviation sector's contribution to achieving net zero carbon emissions including through sustainable aviation fuel and emerging technologies

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.

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.

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.

The Airports Act 1996 is no longer Fit for Purpose.

VTAG submits that the clauses in the Act covering the processes for the preparation of Airport Master Plans, Airport Environment Strategies and Major Development Plans do not provide the key external stakeholders, being the State and local Government, appropriate input into the airports' analyses and decision making prior to calling for public submissions.

For example, under the Airports Act, Melbourne Airport has the sole carriage of the preparation of the "above documents" and then engages in "after the fact" public information sessions, consultations and requesting of public submissions. After the fact, as there is no process of pursuing balanced outcomes and building agreement with the key external stakeholders, being the Victorian Government and Local Governments.

Further, Melbourne Airport under the Act has been given the responsibility of preparing a final draft master plan and draft airport environment strategies (on its response to the submissions) to be forwarded to the Federal department for consideration and eventual advice to the Minister to approve or not approve. This is a clear conflict of interest as Melbourne Airport, as the proponent, cannot be considered impartial nor independent.

The final consideration of public submissions must be undertaken by an independent party, not the Airport Corporation.

The processes enshrined in the Act are, therefore, “not fit for purpose” to obtain optimal outcomes for the airport, the airlines, the State, and the community alike.

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

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.

Airports can no longer be planned in a vacuum from their external environs’ stakeholders and the planning of airports can no longer be driven solely by the operational desires of airlines, Airservices Australia and the airport.

The 1996 Airports Act must be amended.

This must provide for State Governments to be party to the joint preparation of Airport Master Plans and Airport Environment Strategies. This should be in a manner similar to what occurred with the 1990 Melbourne Airport Strategy.

VTAG recommends that: given the role of the States and Territories in the preparation of NASF, the Airports Act 1996 must be reviewed and amended to provide for the State/Territory governments¹ to be party to the joint preparation of Airport Master Plans and Airport Environment Strategies in a manner similar to what occurred with the 1990 Melbourne Airport Strategy and its associated Environmental Impact Assessment as approved by the Commonwealth and Victorian Governments.

¹ VTAG notes that the Brisbane Airport Community Airspace Advisory Board is being set up to better manage aircraft noise issues, with residents from the greater Brisbane region able to apply for five member positions through an Expression of Interest process.

This government initiative needs to be introduced Australia-wide; but VTAG submits, that in line with our recommendations, this initiative is compromised by only including the residents. As a result it is contended that it will produce suboptimal outcomes without including State and Territory planning, transport, and environmental representatives on the board.

Aircraft Noise Impacts and Community Health: Establish New Health Related Aircraft Noise Metrics

The current measurement of noise disturbance to the community, the Australian Noise Exposure Forecast (ANEF), under or near existing and planned runways and flight paths is no longer a sufficient metric to solely apply in the planning of new runways and consideration of their utilisation.

Both ANEF and N contours are used in the planning of Melbourne Airport and other major airports in Australia. But they are a measure of the distraction and disturbance to the surrounding community from aircraft noise; they do not measure the likely impacts on personal health and cognitive development.

VTAG recommendations for immediate consideration by the department for the Aviation Green and White Papers are:

- a. The Federal Government does not consider runway development proposals in any Master Plan or Major Development Plan until there has been an independent evaluation of the existing ANEF/N contour systems to adequately protect the community's health.
- b. That new health related aircraft noise metrics need to be prepared by the Federal government, based on the WHO recommendations, and be enshrined in the Airports Act 1996, Airservices Australia ANEF approvals and in the National Airports Safeguarding Framework (NASF); applicable to all airports in Australia.

Appropriate consumer protections and access to services

The aviation industry has a vital community service obligation to provide basic aviation services for regional and remote communities.

The role of airlines and airports in supporting regional economies; and

A vital role to play in concert with other transport sectors and as part of planning by all levels of Government for sustainable growth and access in the regions.

VTAG Requests Involvement and Input into the Preparation of the Green Paper.

VTAG would wish to make a detailed submission to the department and requests to be part of relevant in-person and virtual roundtables to discuss the above issues and recommendations.