

### **Submission to the Senate Inquiry from Blue Mountain Residents**

The following residents agreed to support this submission. They are representative only of the many residents concerned about aircraft noise in general and Western Sydney Airport in particular. Please do not publish their email addresses as part of this submission – all else can be published. Thanks

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#### **Introduction**

This submission is informed by the experience we encountered, in responding to the development of the Western Sydney International Airport (WSA). Alarming it has become clear that Air Services Australia (AsA) and the Federal Government places the development of the Aviation Industry over and above the needs, amenity and health of the community to the extent that terrestrial beings have no say in how the air space above them is utilised.

A series of Governments have shown a lack of due diligence when developing airports and airport infrastructure – as evidenced by the current development at Badgerys Creek in NSW – WSA is an airport in entirely the wrong place. Successive Governments have failed to prove the economic benefits of airports by not even measuring the negative effects of the airline industry. Over many years Governments have prioritised the airline industry and airline related industries over the health, amenity, and lifestyle of Australian citizens. The airline industry has not been made to address the noise and pollution impacts of aircraft despite numerous Inquiries, submissions, complaints, and demonstrations. In 1985 the Australian House of Representatives held an Inquiry Aircraft Noise and the Australian Community noting that since 1950 aircraft noise was known as a major problem within communities bringing constant citizen complaint and demands for amelioration. Governments have held Inquiry after Inquiry into aircraft noise (and here yet again is another) and the airline industry is still imposing excessive and unreasonable noise on the population. It is time for the Government to act on this and all the previous Inquiries, such as 1995 Senate Inquiry Falling on Deaf Ears. We no longer want to fall on deaf ears.

#### **(a) The effect of aircraft noise on amenity, physical and mental wellbeing and everyday life of residents.**

The United Nations International Civil Aviation Organisation (ICAO) 2019 suggests that aircraft noise should be assessed in a more relevant and community orientated way. AsA uses an outdated method of measuring noise that fails to adequately represent the effect of aircraft noise on the community. In the case of the WSA development measuring noise was limited to urban areas and did not include wilderness and natural environments which make up a large proportion of the proposed flight path area. Best practice recommends

baseline data on ambient noise should be collected for at least two years prior to approval of flight paths to give adequate data. Why does AsA not follow best practice?

- **Noise sensitive areas-** All ambient noise levels should be measured across all potential overfly areas, thereby providing benchmarking to adequately measure aircraft noise disturbance. When measuring noise impacts special consideration should be given to schools, hospitals, areas requiring special quietude such as those of spiritual significance, places of wilderness and natural environment where fauna and flora exist in self-sustaining and uninterrupted ecosystems, and areas of national and heritage significance. For example, in the WSA draft flight path EIS (2023) ambient noise was not assessed at all in the Greater Blue Mountains World Heritage Area (GBMWhA). Thus, highlighting the dubious methodology by which AsA measures intrusive aircraft noise and brings into question the supposed unbiased nature of AsA research and conclusions. Noise monitoring terminals are part of the KSA (Kingsford Smith Airport) flight path architecture and are required in areas of low ambient noise which includes wilderness areas.
- **Noise induced vibration.** There is little indication that AsA considers the impact of noise vibration on humans or ecosystems. The impact of noise vibration on native fauna is poorly researched. In the case of the development WSA this issue was barely considered even though there are several endangered species, such as bats, flying foxes, wedge tailed eagles and the white ibis likely to be impacted. According to the following research 'Human Response to Aircraft-Noise-Induced Building Vibration (Jimmy M. Cawthorn, Thomas K. Dempsey, and Richard DeLoach NASA Langley Research Center,) "Aircraft operations generate noise which impinges upon the exterior of a house and is then transmitted through the house structure to the interior where it is perceived by the resident. In some cases, the noise impingement and sound transmission process will produce structural vibration and/or the rattle of objects within the home. If the magnitude of any (or all three) of these physical stimuli are above an individual's detection threshold, it is likely that the individual will not only perceive them but will combine them in some way to produce a total annoyance response...." This research clearly indicates an impact of noise vibration on humans and therefore on the natural world and yet the airline industry is not required to measure this impact. The 2023 Flight Path EIS for WSA fails to even address the potential impacts of noise vibration on natural or human systems.
- **Noise impact on natural environments-geomorphology.** Environmental geomorphology must be taken into consideration when measuring aircraft noise. Regarding WSA development an independent review of noise impacts should be conducted to gain clarity about all the elements of noise that have the potential to impact but were either downplayed or ignored in the Flight Path EIS. How to minimise the negative effects of noise on wildlife must be considered when assessing areas overflowed by planes. After all these years of Inquiry into aircraft noise, the research has still not been done. In the 7 years between the approval of the WSA 2015 EIS, that permitted the commencement of airport construction and the 2023 Flight Path EIS and considering that an International Airport was being built within 30 kms of a World Heritage Area, Air Services Australia, nor the Airline Industry undertook any research that would begin the process of understanding the impacts of aircraft noise on natural systems. *The quest on must be asked; is this because the results would show such a level of negativity that the airport at Badgerys Creek would have to be abandoned?* The criteria for noise measurement in wilderness and protected areas is inadequate and requires immediate attention and special consideration and must be developed. Suggesting that wildlife will simply adjust to the noise shows a total disregard or appreciation for the complex behaviour of wildlife and interactions between eco systems. The airline industry act as they seem fit and has been

impervious to the intrusive impact of aircraft noise. In the case of WSA flight Path EIS Air Service Australia considered it acceptable to use urban noise criteria to measure natural quiet and wilderness areas as if one size fits all.

- **Health and Social impacts-** Some of the documented impacts are air quality; greenhouse gases (GHG); sleep disturbance; cardiovascular effects; annoyance, mood variations and mental health issues; and cognitive impairment in children. All these human impacts of aircraft noise have been noted and discussed at various Inquires. Citizens have and are demonstrating their opposition to the imposition of 24/7 aircraft noise. Airports such as London Heathrow imposed a curfew on nighttime flying in 2017. In Australia in 2018 a curfew was imposed at Essendon Airport (Melbourne) to alleviate aircraft noise on residents <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aircraft-noise/airport-curfews/essendon-fields/overview>

Yet, In the case of WSA and other airports that are 24/7 there is no mitigation of aircraft noise. Residents are expected to endure aircraft noise day and night – this is totally unacceptable. New airport and airport extension should not be permitted to operate 24/7 and without hourly flight caps. WSA is being built in a major urban growth area on the edge of a World Heritage Area and Blue Mountains National Park and still the Federal Government is insisting, in the face of community opposition, that WSA has to be a 24/7 airport.

Social amenity is a vital component of the wellbeing of community health. It is a difficult thing to measure but successive Governments through AsA, are failing to consider the impact of aircraft flight on social wellbeing. In the case of Western Sydney and in the race provide economic development housing has been permitted to grow in areas where Government is now placing airport developments and airport extension (WSA and Brisbane Airports). This is indicative of the lack of planning and co-ordination between State and Federal Government that leads to social unrest and dissatisfaction.

Noise impacts of aircraft from Federally Leased General Airports – largely small aircraft is an issue largely lost in the issue of large aircraft overflight and yet the annoyance of noise from these aircraft is intense. There is a general increase in noise in flight training from the GA airports many of which are close to residential areas and adjacent natural areas. Circuit training is predominantly the cause of this noise disturbance which occurs at noise sensitive times such as weekends. The issues of training flight noise have not been addressed even though AsA has been aware of the issue for many years, they appear to be unable to come up with a community based solution in the face of the profits and revenue flight training provides for the airport. There must be a clearly defined limit to aircraft noise and this is the responsibility of industry to solve.

AsA is to be condemned for the decades of failure to address the known issues around aircraft noise. Basic research into ambient noise and the development of real-life aircraft noise measuring techniques is a failure to the community and good governance. In the recent Flight Path EIS for WSA the research is inadequate with little attempt to fully understand the impact of proposals being made in the document; community consultation lacks rigor and there are still residents who are unaware of the impact of the proposed flight paths but who will become very aware and angry when the planes start to fly.

**(b) The effect of aircraft noise on small business;**

Small business is just one aspect of the economy but is often lauded by Government as the core of the economy in Australia and yet when it comes to assessing airport development it is expendable compared to the big airline and airline associated industries. In the case of WSA the 2023 Flight Path EIS unsubstantiated claims are made that the local economy in the Blue Mountains will benefit from the new airport. Clearly this is untrue when it is considered that the major economy in the Blue Mountains is made up of small businesses many related to tourism, especially nature-based tourism. The airline industry exaggerates the benefits to the economy of new airport developments however the costs are not measured. In relation to Western Sydney Airport AsA have stated that tourism in the Blue Mountains will increase and hence have flow on economic benefits. This is very questionable due to the 24/7 visual and noise impacts of aircraft having a negative impact on the tourism industry as currently people

come to the World Heritage Blue National Park for respite, wilderness experiences and outdoor pursuits. This is again an example of the power of the airline industry over Government which has become selectively blind to the meaning of economic benefit to the community whilst giving benefits to the airline industry while ignoring the negative impacts of the airline industry and the needs of the community. For example, according to the ATO fuel excise list aviation pays a 3.6c /litre fuel excise (unindexed) while cars pay 46c/litre (indexed twice/year).

Airport Master Plans are provided by the airport proponent and interested parties and they forecast, loudly and often, the economic benefits of aviation to tourism, State economies and the whole country. So called benefits are based on potential passenger and freight forecasts and statements of unanalysed economic benefit without reference to potential negative consequences and no requirement for independent peer review. It is impossible to find an independent assessment of the economic benefits of the aviation sector to Australia or locate a study that weighs aviation benefits against negative impacts such as the costs of the project to health and education. The planning, construction and management of the Western Sydney Airport project is a current case that should be examined. None of the costs of traffic congestion consequences to lives and industry, health care, educational provision and the environment in the Sydney Basin have been considered. The many enquiries, reports, and investigations into the aviation sector fail to meaningfully account for any impact that does not comply with the outcome desired by the aviation industry. Surely it is incumbent upon Governments to have an independent assessment.

**(c) Any proposals for the mitigation and limitation of aircraft noise, including flight curfews, changes to flight paths and alternatives to air travel.**

- Undertake ongoing research to obtain accurate representation of aircraft noise impacts according to international best practice and standards.
- Update as required land use changes based on best practice noise standards
- Implement the conditions legislated in the Kingsford Smith Noise Abatement Act across all airports in Australia.
- Implement curfews at all Australian airports where residential and sensitive ecosystems are impacted.
- Minimum altitude requirements over environmentally sensitive ecosystems such as World Heritage Areas.

- Implementation of minimum altitude requirements that accord with other sensitive areas such as health and education establishments. Constant monitoring of aircraft altitudes and imposition of fines on airlines that fail to comply.
- A clear definition of the time frame used for “night”. This varies across airports.
- Conduct thorough research, assessment and monitoring of the impact of aircraft noise on natural eco systems.
- Develop an effective plan to mitigate and minimise noise impact in populated areas of any size, through regulating national standards for aircraft inflight noise and retrofitting of the built environment to minimise noise impacts where no other option exists.
- Installation of noise monitors in and around all airports and regular assessment of the results of the monitors to ensure aircraft do not exceed noise standards.
- Respectful and genuine involvement of community in development processes to deal with aircraft noise.
- The development of a fresh regulatory approach to flying schools at GA airports including - relocation to regional areas where there is less residential overflight; noise buffers around airports; national noise standards for aircraft in flight training.
- Long Term Operational Plan for every airport
- Hourly flight caps for all airports
- Noise insulation and property acquisition policy-NIPAP- based on a forecast year, haven’t used a base level of noise when airport opens. All NIPPAS must find a base line of noise first and this hasn’t been done.
- A Hush Kit must be fitted on any older jet aircraft- typically used for cargo - to assist with the minimisation of noise on these aircraft with the aim of eventually in an agreed time frame moving the airline industry away from using old, noisy, polluting aircraft in Australia. Consider having airlines implement other noise reduction technologies ( that have been developed refer to <https://www.nasa.gov/news-release/nasa-technologies-significantly-reduce-aircraft-noise/> ) most of these technologies are oriented to the noise at takeoff and not the inflight noise that disturbs so many. The Airline Industry must be legislated to commit to a timeline for aircraft noise reduction. We suggest negotiations should begin immediately and a timeline developed within 12 months.
- Development of a railway system suited to the 21<sup>st</sup> Century. Very Fast Trains driven by non-polluting energy linking major cities and regional centres linked by buses and trucks that are driven by renewable energy. Planning and development of a dedicated freight rail line

As the *Aviation White Paper 2009* Anthony Albanese Minister for Transport and Infrastructure said:

*“The government has also called for action on aircraft noise, with the minister noting that aircraft noise around airports was a significant issue. “Airports are critical economic infrastructure which must operate in a modern economy, but residents have a legitimate expectation that every effort will be made to minimise disruption from aircraft noise.”*

*As such, the government will introduce regulations to stop noisy aircraft such as hush kitted Boeing 727s from flying over residential areas, while Airservices Australia will appoint an Aircraft Noise Ombudsman to handle noise inquiries, review complaints handling procedures, and monitor Airservices’s community consultation arrangements to improve the flow of information to the community.*

*In conclusion, Minister Albanese noted that the policy hoped to deliver equitable outcomes for the aviation industry and the wider community. "I'm confident that the broad approach it outlines will have the general support not only of the airline industry, but also the people who really matter – the broader community."*

It is worth noting that the implementation of an Aircraft Noise Ombudsman has not affected the noise emitted by aircraft but only served to redirect the complaints of community. The airline industry must be made responsible for the impost of aircraft noise on the community by making real life changes as it is clear that bureaucratic changes such as those made in the 2009 Aviation White Paper are not substantial enough.

#### **(d) Any barriers to the mitigation and limitation of aircraft noise**

The following are barriers to the mitigation and limitation of aircraft noise:

- Airline profitability versus community wellbeing. This has created a situation where the regulatory framework is inadequate and where infrastructure development is skewed towards the airline industry to the detriment of developing community orientated transport that is low cost; low impact; and cost reasonable.
- Successive Governments have been hijacked by the Airline Industry and biased Government Policy has developed. Other transport options such as VFR have been ignored or sidelined. A situation now exists where transport has lost options and the community is paying the price of high cost transport by air with few other options available.
- Unregulated use of old, noisy, polluting aircraft. The government has failed to legislate to address noise mitigation and the adoption of quiet aircraft.
- Governments have shown themselves to be duplicitous and are prepared to compromise on wilderness areas and international responsibilities when it suits them to cater to the needs of the airline industry,
- Government and Industry lack credibility in relation to their assessment of the economic benefits of airport development. When aircraft noise is likely to increase due to the building of new runways or a new airport the Government must be honest about noise mitigation. The drawing of a line on map – perhaps where one resident gets mitigation and yet next door neighbour is excluded is reprehensible. This has occurred with the WSA development where the Flight Path EIS suggests that no more than 91 residences will require retrofitting.

#### **(e) Any other related matter**

Below is a list of related matters regarding the cooption of Government by the airline industry that require urgent attention:

- **Environment, including climate and biodiversity.**  
When it comes to the environment and biodiversity, decision makers appear to be willing to compromise for the benefit of the airline industry. The 2023 Flight Path EIS written for WSA is an example of how Government department is willing to ignore environmental impacts by not even studying the impacts on areas such as the GBM WHA and the Endangered Cumberland Plain. The 2023 EIS and the 2015 EIS were written disregarding the climate crisis and in such a way to ensure the development of the airport at Badgerys Creek and endanger UNESCO World Heritage listing of the Greater Blue Mountains World Heritage Area.
- **Climate change**

As a contributor to global GHG emissions the aviation industry must be accountable and address the impacts of the industry on climate change.

The WSA development has failed in both the 2015 and the 2023 EIS to address the impacts of climate change. The document 'Benchmarking Summer Heat' from Urban Studies School of Social Sciences, University of Western Sydney, Parramatta speaks to research about urban heat in the Penrith City Council LGA which is inclusive of Badgerys Creek. In part it concludes that Badgerys Creek is one of the hottest areas of the LGA and that with increases in hard surfaces and without heat mitigation the LGA will become one of the hottest places in NSW. Marked temperature changes such as those suggested in the research cited above will affect an aircraft's performance, for example, rising temperatures will reduce aircraft lift and therefore impact infrastructure requiring lengthened runways to enable take-off

Changes in the level of rainfall precipitation and intensity, along with mist and fog will result in schedule delays and cancellations. More frequent strong wind and storms have already been experienced and more are expected, changing wind patterns will increase turbulence result in further increased schedule disruption and problems with aircraft lift.

- **Sustainable Aviation Fuel (SAF) and Avgas.** Small piston engine aircraft use Avgas treated with lead to prevent "knocking" of the engines. The lead is emitted by these aircraft over land and sea and this fuel needs to be banned just as "super" petrol was banned for cars. SAF – Sustainable Aviation Fuels. In 2019 the aviation industry committed to reducing carbon emissions by 50% from their 2005 level by 2050 by using a mix of sustainable aviation fuels (bio-fuel) and jet fuel (kerosene). Where is this commitment now and why is it taking so long when the first flight using bio-fuel took place in 2008 and since then many more flights have used bio-fuel to take flight. In 2019 only 5 airports had regular bio-fuel distribution - Bergen, Brisbane, Los Angeles, Oslo and Stockholm. Qantas and Airbus set up a fund in 2020 to invest in bio-fuel refinery in Queensland – where is it? Western Sydney Airport flights should be SAF only. We suggest to levy the airlines for every flight that is not SAF compliant including freight.
- **Community consultation,**  
In 2023 Air Services introduced a 'Community Engagement Standard for Flight Path and Airspace Change Proposals' and requested public submissions to their standard. The introduction of this standard follows decades of community unrest regarding the handling of airport development and the aviation industry. Throughout this time AsA and various Governments have favoured the industry over community interests. The acceptance of substandard work in assessing the impacts of airports and airport development has left the community sidelined and AsA needs to make many operational alterations to bring about an impartial position where the community can rely on their issues being heard and addressed.

In the draft Community Engagement Standard, it states:

"This Community Engagement Standard has been developed to provide a clearly defined process for engaging with the public on flight path and airspace changes of various scope, scale and complexity. .... It will establish a benchmark against which to measure our performance. .... We seek to fulfill these obligations through our Flight Path and Airspace Change Program and in particular our community engagement activity."

The draft standard appears comprehensive and will help in improving and standardising engagement processes, but only if it is implemented in a consistent, transparent way for all stakeholders, not just government and industry but for impacted community.

Despite these potential improvements there are other recommendations to be made to improve the engagement of Air Services with the Australian community:

- The Standard once finalized should be revisited every 3-5 years to ensure Air Services is remaining current with community feeling.
  - The Standard must define an agreed limit to acceptable noise and visual impacts on human and ecological communities.
  - The Standard must define measurement of GHG and air pollution and what are environmentally acceptable climate impacts.
  - Community engagement must be clearly outlined to reflect community expectations and not those of Air Services and the aviation industry.
  - The community must be empowered through effective and democratically run Community Forums. Currently there is structural bias in development of the Community Groups. For example, SCAF (Sydney Community Airport Forum) has much greater influence and input to aviation decisions at KSA than any other Airport Group in Australia, having community representation and government appointed representatives and AsA administrative support. While at the other end of the community consultation framework from is FoWSA (Forum of Western Sydney Airport) a group that has no community representative and holds its' meetings incognito, thereby effectively removing any chance of the community in providing input to decisions-making. Community groups need to have clearly defined responsibilities and abilities and influence in developing aviation policy in Australia and protecting communities and have consistency in formation, operation, and reporting.
  - Community outrage is not to be dismissed.
  - The Standard must be free of statements that are open to interpretation and misrepresentation.
  - Community consultation must be effective, transparent and community driven with AsA advice.
- **Flight Paths and Flight Tracks.**  
It is the custom among Air Traffic Controllers (ATCs) to allow aircraft to fly outside the designated flight path to such an extent that it makes flight paths such as those delineated by the WSI Airport 2023 Flight Path EIS misleading and meaningless. The whole issues of flight paths and flight tracks needs investigation and aircraft should be fined for flying outside their designated flight paths. The AsA practice of giving permission to pilots to fly outside nominal flight paths is designed to benefit the airlines at the expense of the community for reasons such as saving flight time; flight distance; fuel. By reducing costs, the airlines increase profits – all at the expense of the community. Flight Paths are designed at the behest of Air Services.
- **Airport development** – Aviation policy has been captured by the airline industry, through AsA. For example, during the development of Western Sydney Airport a 12point list of flight design principles were developed. All the points favour the airline industry to the detriment of the community. This may be viewed as part of the 2015 WSA EIS.



There is evidence of structural bias in the development of WSA as demonstrated in the following table which compares regulation at KSA with proposed regulation at WSA. This type of bias and disparity should not be permitted in a society that aspires against discrimination. as it disadvantages members of the community. Regulation of airport development should be consistent across Australia.

Regulation Detail	KSA	WSA
Night time curfew	<b>Yes</b> 11pm -6am – no flights post WSA opening	<b>No</b> 24/7 365days per year
Limit of flights per hour	<b>Yes</b> – 80 flight movements per hour	<b>No</b> Airport Operator determines the flight numbers per hour
Community protections from Airport Operating Plan	<b>Yes</b> Legislated LTOP which minimises community impacts	<b>No</b> The Airport Operator has powers to decide operational limits based on profitability and not community impacts
Community impacts given importance in Flight Path Design and changes	<b>Yes</b> the LTOP builds in community protections. E.g. this has protected KSA from being impacted by WSA flights but not vice versa.	<b>No</b> Flight Path Design Principles place airline and airport efficiency (read profitability) ahead of any measures to minimize impacts on communities
Ocean overflights to minimize community noise and pollution	<b>Yes</b> KSA LTOP in community protections by flights being directed to take off and land over the ocean	<b>No</b> there is no possibility of this for Western Sydney residents
Strategy to minimize noise and pollution through spreading of arrival and departure flights over a wide area of the Sydney Basin	<b>Yes</b> KSA's LTOP builds in community protections through a strategy to share aircraft noise across a large portion of the Sydney Basin	<b>No</b> Any attempt to implement noise sharing will be ineffectual due to the large number of constraints on the physical locality of WSA – Great Dividing Range and the GBMWHA; Warragamba Dam -Sydney's' Water Supply; Existing Sydney Metro Airports – Camden and Bankstown; At least 3 Defence establishments – Richmond Airforce Base, Orchard Hills and Holsworthy
Airport Community Forums open to public observation and scrutiny and provided with effective powers of representation to protect the community	<b>Yes</b> SACF (Sydney Airport Community Forum) meets 4 times annually; welcomes ordinary members of the public to attend and observe and has legislative protections to fall back on	<b>No</b> The Forum on Western Sydney Airport (FOWSA) meets 3 times per year and is held behind closed doors and is tightly controlled by Air Services and representatives of the Airline Industry. Does not welcome public input or observation.

➤ **Legislation and Regulatory Framework – not fit for purpose.**

Successive Governments have failed to address community concern about airport development and operation even though there have been a plethora of Senate and Parliamentary Inquiries e.g. 1995 Falling on Deaf Ears; Senate Estimates; Independent reports; submissions to EIS and inquiries and countless Ombudsman reports etc.

Aircraft noise affected communities feel disenfranchised by their governments – State and Federal and struggle with a regulatory framework that is complex, dense and inaccessible for many.

Different communities around the nation are treated in different ways yet the aviation industry connects them all through a fragmented amalgam of Commonwealth statutes, state and local government planning and legislation which are managed across multiple portfolios, departments, statutory authorities, corporatised entities all of which have multiple acronyms and distinctive language that deprive community members of access.

There are various Acts that govern Aviation in Australia that require consideration to bring them into line so they can be effective contemporary legislation that gets the balance right between commercial imperatives, safety, compliance with ICAO, (to which the Commonwealth Government is a signatory) providing appropriate community protection for communities impacted by aircraft operations. This includes Airports Act 1996, Civil Aviation Act 1988 and Air Services Act 1995 and related legislation and subordinate regulation.

The deficiencies in Australian aviation legislation and regulatory framework lead to affected communities having to arbitrarily, unfairly and unnecessarily absorb the costs of aircraft noise resulting from, for example: a) development and expansion of airport infrastructure, such as new airports or runway changes at existing airports; b) alteration to flight paths to accommodate increased capacity or changes to air navigation technology, without appropriate community input or consultation; and c) cumulative increase in training flights around General Aviation airports.

➤ **Air Services**

There is a lack of consistency, transparency and effectiveness of AsA processes in regard to community engagement, consultation and empowerment. This is manifested by the number of community groups created to address concerns and the number of complaints.

AsA and CASA must become responsible to the citizens of Australia and to the Australian biodiversity and ecological communities for the impacts of the aviation not to the airline industry.

**Recommendations**

- Co-ordinated planning between all levels of government, starting with the local level when changes to airports or the building of airports is planned.
- No development can progress without research, reporting and mitigation on the climate impact of the development
- All air industry development should be assessed by an independent arbitrator using clear guide lines and processes.

**“A balanced and sustainable aviation future for all Australians requires communities to have equal say in aviation policy and decision-making”**

**From Community Aviation Alliance Australia**