AUSTRALIAN AIRPORTS ASSOCIATION

29 April 2024

Committee Secretary
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**Inquiry into the impact and mitigation of aircraft noise**

The Australian Airports Association (AAA) welcomes the opportunity to provide this submission to the Committee's Inquiry into the impact and mitigation of aircraft noise (the Inquiry).

The AAA is the national voice for airports, representing the interests of more than 340 airports and aerodromes across Australia. It also represents more than 150 corporate members supplying goods and services to airports and the wider aviation industry.

The AAA notes the Inquiry takes place within the context of existing work by the Australian Government, including the Aviation White Paper (White Paper) and review of the National Freight and Supply Chain Strategy (NFSCS Review)[1]. The White Paper and NFSCS Review both address aircraft noise, with the AAA making submissions to both. The AAA appreciates the statement in the Aviation Green Paper which affirms "The Australian Government is not considering imposing any additional constraints on airports such as curfews or movement caps".[2]

This submission refers to the AAA's positions on noise already covered in both its White Paper and NFSCS Review submissions and expands on them where appropriate.

**Setting the scene**

Australia's airports are vital to the economic and social wellbeing of all Australians. Airports are critical infrastructure, generating substantial direct and indirect employment and economic activity. Australia's airports sustain the connectivity for people and goods within domestic and international transport networks.

The connectivity that airports and the aviation sector provide is particularly important in regional and remote Australia, where aviation may provide the only public transport service for many communities. Even in south-eastern Australia, the absence of comparable alternative public

[1] Department of Infrastructure, Transport, Communications, Regional Development and the Arts [DITCRDA] (2023), Review of the National Freight and Supply Chain Strategy Discussion Paper. Viewed on 10 April 2024 at: https://www.infrastructure.gov.au/sites/default/files/documents/national-freight-and-supply-chain-strategy-discussion-paper.pdf

[2] Department of Infrastructure, Transport, Communications, Regional Development and the Arts (2023), *Aviation Green Paper*, p. 8.

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transport systems means there is no viable alternative to aviation in the short term for intercapital and interregional travel.

Every Australian has an abiding interest in the economic viability of airports, either as part owners of major airports through their superannuation funds, or of regional and remote airports as local government ratepayers.

- Australia's major airports are international gateways facilitating international tourism and maintaining access to world markets for passengers and freight.
- Capital city 'metro' general aviation (GA) airports support emergency services – including ambulance, police and fire services – and essential operations, such as patient and organ transfers and flight training schools.
- Australia's regional and remote airports support export-oriented agribusiness, aviation education and training, assist in medical evacuation and bushfire fighting operations and are entry points to world-renowned tourist destinations. In the absence of alternative transport modes, regional and remote airports often provide the only public transport links between regional and remote Australia and the educational, medical and professional services in larger towns and major cities.

Airports are also key enablers of employment and activity in the Australian economy. Analysis commissioned by the AAA demonstrated that in 2022, Australia's airports:

- Contributed $105 billion of value-added economic activity (around 5% of Gross Domestic Product [GDP]) and supported 690,000 full time equivalent (FTE) jobs (approximately 5% of all jobs).[3]
- Transported 117 million passengers and facilitated freight exports worth $51 billion,[4]
- Provided a place of learning for student pilots, hosting 337,000 flight training hours, mostly at capital city 'metro' airports, and;[5]
- Facilitated international and domestic tourism worth $34.9 billion and supporting 263,000 FTE jobs in tourism and related sectors.[6]

**The structure of Australia's aviation sector**

There is understandable confusion within the community, media and government on the roles and responsibilities in relation to aircraft noise within the aviation sector. This can lead to community frustration and confusion when there is 'no right door' to go through in seeking solutions to noise issues. To improve understanding of how the sector works, the AAA offers the following guide in relation to aircraft noise, demonstrating the interactions between the three main groups that make up Australia's 'tri-partite' system in the aviation sector:

The Australian Government plays a significant role in the nation's aviation sector, particularly in the realm of aircraft noise, through the following organisations:

- Airservices Australia (AsA) is responsible for airspace design and management, air navigation and air traffic control services. AsA is a government-owned service delivery agency established under the *Air Services Act 1995* as sole provider of these services.
    - AsA's legislated function is provision of air traffic management and air navigation services to airlines and aircrew, including design and management of flight paths.

[3] Deloitte Access Economics for the Australian Airports Association (2023), *Taking Flight: The economic and social contribution of Australia's airports,* p. 2.

[4] *Ibid*., p. 8.

[5] *Ibid*., p. 12.

[6] *Ibid.,* p. 15.

    - It also manages the national Noise Complaints and Information Service (NCIS), the Australian aviation industry's main interface with the community in aircraft noise and related issues.

- The Civil Aviation Safety Authority (CASA), Australia's air safety regulator, oversees AsA's flight path design and development under a set of rules and guidelines. CASA is also the safety regulator for all Australian-based aircraft and airport operators.
- The Department of Infrastructure, Transport, Regional Development, Communications and the Arts (the Department) is the Australian Government department charged with overall responsibility of aviation in Australia, including oversight of and liaison with AsA and CASA. The Minister for Transport sets aviation policy and regulation on advice of the Department, including on aircraft noise, based on International Civil Aviation Organisation (ICAO) models and best practice from around the world.

  The Department is also the primary regulator for Airport operators, responsible for managing leases and approving Masterplans that set the operating parameters for the 22 federally-leased airports under the *Airports Act 1997* (the *Airports Act*).[7]
- In addition, the Aircraft Noise Ombudsman (ANO) is responsible for investigating noise complaints from the public which cannot be, or have not been, resolved by AsA (or Defence in the case of military aviation). While the ANO is nominally independent of both bodies, it reports directly to the AsA Board (or Chief of Air Force) as appropriate.

Within the framework of Australian Government oversight, Airport Operating Companies (AOCs) have no direct role in formulating or administering aviation policy. They also do not develop or manage flight paths or can they influence aircraft noise beyond the airport boundaries. AOCs have few direct levers or ability to control aircraft noise as AsA control flightpaths and aircraft movements around airports and aircraft operators conduct flight operations. Airport operators do, however, engage with and support AsA in the design of flight paths and airspace operations.

At larger airports with Air Traffic Control (ATC) towers, airports support AsA to best manage an airport's physical infrastructure of runways, taxiways and terminal gates. The primary responsibility of AOCs at the 22 federally-leased airports is building, maintaining and operating airport infrastructure and managing growth in line with the lease obligations, their approved Masterplans and the regulatory requirements set out under the *Airports Act*.

Since 2009, 19 of the 22 federally-leased airports and two non-federally leased airports have established and maintained a *Community Aviation Consultation Group* (CACG) with the support of the Department.[8] The CACG is a regular meeting of airport stakeholders (e.g. AOCs, government agencies, community representatives, aviation and business representatives) which allows a two-way flow of information between the airport operator, its tenants and the community. CACGs provides the community with opportunities to make comments and suggestions regarding the operation and development of its airport. While CACGs are not decision-making bodies, they aim to facilitate constructive, open discussion of airport operations and their effect on nearby communities.

Aircraft Operators (airlines, general aviation [GA] operators) have a much more direct relationship with AsA as they fly aircraft on approved flightpaths in airspace controlled by AsA. Adherence (or otherwise) to approved flightpaths by aircraft operators in controlled airspace has a major effect on

[7] The 22 federally-leased airports include the 21 airports listed on the DITCRDA website : (https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/airports) plus Western Sydney Airport.

[8] Airservices Australia (n.d.) 'Community Aviation Consultation Groups'. Viewed on 26 April 2024 at: https://www.airservicesaustralia.com/community/community-aviation-consultation-groups/

the generation and distribution of aircraft noise, particularly in flightpaths over built-up areas on the take-off and landing at airports.

Aircraft operators can moderate the levels of noise emitted by their fleet, particularly from changing their fleet's composition to more modern, lower noise aircraft. The AAA understands the major domestic carriers are modernising their jet fleets, while international carriers working in and out of Australia are also updating their fleets to lower noise aircraft. The speed at which this transition takes place is dependent on overseas aircraft supply chains for the two largest manufacturers (Airbus and Boeing) and others (Bombardier, Embraer).

Similarly, multiple Australian aviation small businesses are developing lower noise, lower emission electric and hydrogen-powered aircraft or seeking to retrofit existing aircraft with electric or hydrogen powerplants. This will help in some ways to meet the fleet replacement challenge facing regional RPT and charter aviation, which relies heavily on fleets of older, turboprop-driven aircraft (de Haviland Dash-8, Saab 340) and parts of the GA aviation fleet, such as flight training aircraft.

However, modernisation of fleets may well have only limited effects on aircraft noise due to the residual value of older aircraft to the aviation industry, particularly as they pass out of mainline domestic and international RPT service and cascade into freight (Boeing 747-400F) or charter operations (Fokker 100, BAe 146). This often means older aircraft remain in service with 'grandfathered' noise certificates that allow them to remain operational.

**Global rules for aviation**

It is also through the Department that Australia engages with the global rule-maker for the aviation industry, the International Civil Aviation Organisation (ICAO). ICAO develops policies and standards, undertakes compliance audits, performs studies and analyses, helps build worldwide aviation capability through the cooperation of its 193 Member States and stakeholders. The Department represents Australia's aviation interests at ICAO and applies its rules and standards to the safe and efficient management of Australia's domestic and international aviation operations.

In terms of managing aircraft noise, ICAO provides advice to member states through its *Guidance on the Balanced Approach to Aircraft Noise Management* (Balanced Approach).[9] The Balanced Approach contains four principal elements, namely:

- Reduction of noise at source (quieter aircraft, noise reducing air traffic management);
- Land-use planning and management (zoning restrictions, development controls around airports and under flightpaths);
- Noise abatement operational procedures (for departure, approach, ground operation), and;
- Operating restrictions on aircraft (movement caps, curfews).

Assessment of the trade-offs between these four elements will identify appropriate noise management strategies as part of a Balanced Approach. However, ICAO provides a caveat to member states viewing caps and curfews as a 'go to' option, clearly stating operating restrictions such as caps and curfews are a strategy of last resort, only to be used after the benefits of the first three elements have been considered.[10]

**All levels of government have a role in managing aircraft noise**

Despite effective land use planning to protect airports and airspace being the best tool to minimise the effects of aircraft noise, airports have relatively few ways to influence land use planning and development for airport protection. Most land use planning powers are held by state and territory

[9] International Civil Aviation Organisation (2008), *Guidance on the Balanced Approach to Aircraft Noise Management (Doc 9829)*, 2nd Edition, Montreal.

[10] ICAO (n.d.), The Balanced Approach to Aircraft Noise Management. Accessed on 23 April 2024 at: https://www.icao.int/environmental-protection/Documents/Publications/Guidance_BalancedApproach_Noise.pdf

governments which control, zoning, rezoning, land release and development control around airports. Governments face conflicting priorities when managing land use around airports, from:

- Planning systems that encourage developing land to its 'highest and best use';
- A long-term shortfall in capital and regional city housing construction, alongside;
- Relatively weak controls for airport safeguarding within most planning systems.

Even where 'buffer zones' have been provided around key transport infrastructure such as airports, development has been allowed to encroach into buffer zones and under flight paths for decades, leading to a growth in aircraft noise complaints, particularly in Australia's capital cities.

With or without new aviation infrastructure and new or altered flightpaths, encroachment occurs despite efforts of airport operators and the Australian Government to protect airports and airspace through the National Airports Safeguarding Framework (NASF).[11] The NASF has nine guidelines, covering a range of factors informing decision making on proposals for land use changes in the vicinity of airports, including aircraft noise.

Real-world examples of conflicts between NASF's airport safeguarding requirements and jurisdictional planning imperatives to develop land to its highest and best use include examples of tension between state and local government policies to increase housing supply or other planning goals, including:

- Delivering higher density housing by rezoning former 'brownfield' industrial sites near airports in major cities – an issue particularly affecting Sydney Airport;
- Relaxation of building height limits in capital city CBDs and town centres infringing into take-off and approach paths at major airports;
- Development of public infrastructure encroaching on public safety buffer zones around airports, and;
- Renewable energy generation sites and transmission corridors affecting take-off and approach paths at regional airports.

Aircraft noise in capital cities affects not only the major gateway airports, but also the capital city 'metro' airports, which specialise in general aviation (GA), flight training and emergency services operations. At these airports, the pandemic-led switch to greater levels of working from home exposed many people living near these airports to aircraft noise for the first time, particularly from flight training operations. Metro airports also face challenges to their continued operations from:

- 'Spillover' effects across metropolitan areas with aircraft activity at metro airports blending into more crowded airspace from:
    - Capacity expansions at capital city gateway airports (e.g., Brisbane parallel runway, Melbourne's proposed third runway);
    - The commencement of new capital city airports (e.g., Western Sydney International Airport, starting in 2026), and;
    - Related changes to flight paths and airspace regulations across an entire metropolitan area such as the Sydney Basin, South-East Queensland or Greater Melbourne.
- Noise-based objections to Major Development Plan applications for new aviation developments. These objections undermine an airport's licence to grow and deliver significant economic, employment and social benefits in accordance with their approved Masterplans and their leases with the Australian Government.

[11] Transport & Infrastructure Council (2019a), *National Airports Safeguarding Framework*. Viewed on 8 April 2024 at: https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-safety/aviation-environmental-issues/national-airports-safeguarding-framework

Airports in regional Australia face similar pressures, particularly where airports are:

- Supporting offshore critical infrastructure of national significance;
- Collocated with Defence facilities undertaking high-noise 'warlike' flight operations;
- Seeking to improve their viability by attracting new domestic and international routes to facilitate more tourism and business travel as the aviation industry shifts from 'hub and spoke' to 'point to point' operations, and;
- Facing encroachment into public safety 'buffer' zones from greenfield residential and public infrastructure developments (such as schools and health care facilities), particularly in fast-growing, high amenity regional centres.

All these examples create potential for increased aircraft noise complaints from conflicts between approved take off and approach flightpaths to airports and the encroachment of new land uses in urban or regional environments This can also mean application of NASF is not top of mind when jurisdictions assess development applications for infill development or State/Territory significant urban renewal projects.

In the 12 years since May 2012 when Australia's transport ministers agreed to adopt the NASF into state and territory planning systems[12], progress on implementation has stalled. This is despite other Australian Government transport policies such as the *National Freight and Supply Chain Strategy National Action Plan* also calling for governments to "identify and protect key freight corridors and precincts from encroachment", including using the NASF to safeguard airports.[13]

A review of NASF implementation began in 2019 and was delivered in 2021.[14] The Review found take-up of NASF by jurisdictions was delayed and inconsistent and while the 22 Federally-leased airports were better protected through Australian Government safeguarding regulations, safeguarding at most Australian airports were inconsistently protected under State and Territory planning systems. To improve NASF's implementation, the Review's 8 recommendations included:

- Commonwealth/State/Territory Ministers endorse an intergovernmental agreement to standardise a national approach to airport safeguarding (Recommendation 1);
- Australian Government to include provisions relating to consideration of the NASF in legislation at the 22 federally leased airports by 2027 (Recommendation 4);
- State/Territory governments to include provisions relating to consideration of the NASF in their respective planning regimes by 2027 (Recommendation 5), and;
- State/Territory governments to develop and disseminate clear policy/guidance on the status of the NASF (for that individual jurisdiction), and how it should be applied to large and small airports (Recommendation 6).[15]

The AAA's view is that Australian governments at Federal, State and Local levels play a critical role in airport safeguarding through their ability to influence or manage the land use planning system on or around airports. The AAA advocates for the Review's recommendation of a 'second round' of reform to revitalize NASF implementation and ensure it is embedded into each jurisdiction's planning system. Measures the Australian Government could take includes:

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[12] Standing Council on Transport & Infrastructure (2012), *Communiqué* 18 May 2012. Viewed on 8 April 2024 at: https://web.archive.org.au/awa/20131017012833mp_/http://pandora.nla.gov.au/pan/142883/20131017-0815/www.scoti.gov.au/communique/files/SCOTI_2nd_Communique_FINAL.pdf

[13] Transport & Infrastructure Council (2019b), *National Freight and Supply Chain Strategy National Action Plan*, Canberra, August, p. 17.

[14] Transport & Infrastructure Council (2019c), *National Airports Safeguarding Framework 2019 Implementation Review*.

[15] *Ibid.* p. 31.

- Extending from 2027 to 2030 the target for NASF's national adoption identified in recommendations 4 and 5 of the 2019 NASF review, with adoption linked to incentive payments like those recently used at National Cabinet for the Housing Accord;
- Making the Department a referral authority in each jurisdiction's planning legislation for development proposals affecting the operation of Federally-leased airports;
- Taking a stronger role in airport safeguarding, by using its regulatory power to prescribe developments or activities affecting airport operations as 'controlled activities' under S. 182 (f)(i) of the *Airports Act 1996*.

**Effects of caps and curfews on airport operations**

Bearing in mind ICAO's advice in its Balanced Approach document that caps and curfews should be considered only as a last resort, proposals to place caps or curfews on airports that currently operate without restriction would be a retrograde move. Imposing new restrictions on airports would see significant direct and indirect impacts felt across the national and international passenger and freight networks along with the GA and flight training sector, including:

- Difficulty in network recovery from delays. This effect is already seen with the movement cap at Sydney Airport, particularly when high winds or lightning storms affect flight movements. Once delays occur, they propagate up and down the East Coast, regional and East-West transcontinental routes and are hard to recover from. Movement caps and curfews at other major airports would make the network less resilient and make recovery from weather or other events more challenging.
- Effects at other Metro and Regional airports: As well as the major capital city airports, 'metro' and large regional airports would also face significant challenges from caps and curfews in the following ways:
    - At Metro airports with significant flight training facilities, night and morning training flights are essential in ensuring trainee pilots can fly in a range of conditions. Levels and hours of flight operations are set in Metro airport Masterplans, approved by the Minister for Infrastructure and Transport. Caps and curfews at Metro airports would undercut approved parameters of airport operations.
    - Large regional airports need to be able to service significant economic activity from tourism and leisure industries and, in some cases, servicing nationally significant energy and resource sector infrastructure.
- Connectivity into the global aviation network: Australia's geographic location at the ends of the global aviation network can mean international arrivals and departures are timed around global hubs such as Dubai, Singapore and Los Angeles. Managing connectivity into global networks from Australian airports without curfews often sees reliance on 'back of clock' operations after 10pm and before 6am. Placing curfews on currently unrestricted airports would force these 'back of clock' operations either side of a curfew and further concentrate aircraft noise in the 'shoulders' of the curfew and put further pressure on airports that are already at or near capacity in peak times.

**Other comments**

The AAA also recommends the Committee considers these other barriers and challenges to managing aircraft noise at and around airports:

- Environmental matters: It is also relevant to note the environmental trade-offs required between reduction of noise emissions and greenhouse gas emissions. Using diversionary flightpaths to avoid residential areas and other sensitive environments will shift aircraft noise emissions but also increase fuel burn and greenhouse gas emissions. How these trade-offs are managed will affect the efforts of the aviation sector and Australian

Government to reduce domestic and international aviation emissions ahead of 2050 net zero goals.

In reducing on-airport noise emissions, headway is being made through policies and infrastructure reducing engine ground running, which is essential for effective and safe aircraft operations, but is also a major source of ground-based airport noise. Operational rules and procedures are minimising noise impacts outside airport boundaries, along with progressive infrastructure upgrades. In particular, the fitting of fixed electrical Ground Power Units (GPUs) at airport gates to provide a quieter and lower-emissions alternative to diesel-powered GPUs and aircraft Auxiliary Power Units (APUs).

In future years, the electrification of more ground-support aircraft such as aircraft pushback tugs, baggage tugs and other on-airfield vehicle fleets will further reduce noise produced on airport. At the same time, the increasing number of next-generation quieter aircraft in domestic and international aircraft fleets is expected to further reduce noise. While each measure may only reduce noise by a few percent below current levels, the cumulative effect will be to reduce ground-based and airborne noise impacts in areas around airports.

- Airservices' role in reducing the community's 'trust deficit': Over the past 18 months, Airservices Australia (AsA) has continued to rebuild confidence within the aviation sector through a greater level of openness with airports and airlines regarding operational challenges and issues. This has gone a long way to improve the relationship between Airservices and the aviation industry.

  The level of community concern with the activities of AsA and the sector more broadly on aircraft noise is well understood by the 21 airports that host Community Aviation Consultation Groups (CACGs). Noting the positive effects on industry confidence from better data sharing and stakeholder engagement observed from AsA on operational matters since 2023, similar confidence building measures could also be used by AsA on community engagement to help overcome community perceptions of a lack of transparency in its engagement efforts on flightpaths and aircraft noise.

Yours sincerely

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