



### 2. EXTERNAL CONSULTATION / COMMUNICATION

2.1 Nil

### 3. DISCUSSION

3.1 The Aviation Policy Paper is a separate process to the upcoming Parafield Airport Master Plan which is anticipated to be released for public consultation in February 2024.

3.2 The Aviation Policy Paper will apply to all aviation settings across Australia, including regional and metropolitan airports.

3.3 Key topics covered in the Policy Paper include:

3.3.1 Future directions out to 2050

3.3.2 Airlines, airports and passengers - competition, consumer protection and disability access settings

3.3.3 Regional and remote aviation services

3.3.4 Maximising aviation's contribution to net zero

3.3.5 Airport development planning processes and consultation mechanisms

3.3.6 General Aviation

3.3.7 Fit for purpose agencies and regulations

3.3.8 Emerging aviation technologies

3.3.9 Future industry workforce

3.3.10 International aviation

3.4 The key points made in the submission are based on known positions of Council as follows:

3.4.1 The two airports in Salisbury multiplies the impacts on residents and businesses with every federal aviation policy change or addition.

3.4.2 Council supports the initiatives to reduce aviation emissions.

3.4.3 There is a need for a fresh large-scale acoustic study to update the 1979 study that is used as a basis for the acceptable levels of aircraft noise exposure across Australia.

3.4.4 The complex information needs to be simplified for public understanding of impacts.

3.4.5 The Australian Noise Exposure Forecast is updated with every Masterplan produced for the airports. The ANEF contours change with every iteration and continually impacts on new areas. In South Australia, the ANEFs are now incorporated into the SA Planning and Design Code and results in new areas having to be assessed for acoustic building treatments to meet the required levels of noise intrusion. A change to the Federal policy to use the Ultimate Capacity contours would reduce the need to update the ANEF on a regular basis, and minimise the additional assessment burden and Planning and Design Code mapping.

- 3.4.6 There are impacts on housing construction and affordability to meet the noise intrusion standards.
- 3.4.7 General aviation flight training schools should have a maximum usage trigger as a proportion of flight movements in order to lessen the impacts on surrounding residents.
- 3.4.8 Continued transition to electric aircraft is supported.
- 3.4.9 The City of Salisbury can support local aircraft manufacturing capability through the Polaris Business Development Centre business skills and advice.
- 3.5 Should Council wish to raise any other matters in relation to the Aviation Policy Green Paper, further comments can be provided to the Federal Government.
- 3.6 Financial Overview - Nil

#### **4. CONCLUSION**

- 4.1 Administration's submission has been acknowledged by the Federal Government.
- 4.2 Any additional matters raised by Council can be provided to the Department of Infrastructure, Transport, Regional Development, Communications and the Arts.
- 4.3 Council's input into the public consultation of the Parafield Airport Master Plan will be sought when it is released for public consultation.

## **Aviation Green Paper – Towards 2050**

Comments from City of Salisbury, South Australia

Thank you for the opportunity to submit on the Aviation Green Paper – Towards 2050.

This submission has been prepared and submitted prior to an endorsement of Council, and is based on its known positions on aviation matters. Should any endorsement change elements of this commentary, you will be updated.

The City of Salisbury is a suburban Council in metropolitan Adelaide, South Australia and is home to Parafield Airport, a significant general aviation and flight training airport under the management of Adelaide Airport Ltd, and the RAAF Base Edinburgh which is a Defence super-base.

The City of Salisbury has been aware of airport related matters for many years due to its consideration of the benefits and impacts on the local communities of these two significant airports within its boundary. Council is a member of the Parafield Airport Consultative Committee and the Adelaide and Parafield Airports Planning Coordination Forum. Council has also had regular dealings with the Department of Infrastructure, Transport, Regional Development, Communications and the Arts (and its predecessors) through its Aviation and Airports Division. Council is a member of the Defence Teaming Centre, and has often liaised with Defence SA, and the Department of Defence – Estate Planning Land Planning and Regulation Infrastructure Division.

I can advise that Council has generally supported Aviation and planning reform in order to have an improved outcome for the community. This has been achieved through the adoption of various planning policies and NASAF Guidelines, including Public Safety Zones in its policy deliberations as opportunities arose.

However, it must be recognised by the Federal Government, NASAG, and State Planning Ministers that the incremental imposition of the various Guidelines and regulations for the protection of airports have a significant and increasing impact on the communities around airports, and are multiplied in the City of Salisbury due to the presence within the City of two significant airports. This is having an impact on the economic potential of a significant number of properties and businesses, and is not being considered in the context of a balance between community and airport needs. The burden of protecting airport operations must be shared across the community and airports as the impost on individuals would be inequitable.

In response to the Green Paper, I can indicate that:

### **Sector Overview**

No comment

### **Future Directions out to 2050**

Supports

**Airlines, airports and passengers- competition, consumer protection and disability access settings**

Supports

**Regional and remote aviation services**

Supports

**Maximising aviation's contribution to net zero**

The City of Salisbury strongly supports the initiatives to reduce emissions by the aviation industry, through such means as the preparation of a Transport and Infrastructure Net Zero Roadmap, use of Sustainable Aviation Fuel and the establishment of a domestic SAF industry, and the Jet Zero Council forum, the continuing research and deployment of hydrogen and electric powered aircraft in a safe progression. This particularly applies to Parafield Airport which has the major component of its activity being flight training operations. Federal support and subsidies for such aircraft should be considered and introduced which would also contribute to the reduction of airplane noise for the residents affected by the flight paths.

**Airport development planning processes and consultation mechanisms**

The City of Salisbury considers that the Federal government should undertake another major Socio - Acoustic study to assess the impact of aircraft noise on residential communities in Australia. Many parameters and considerations have changed since the last study was done in 1979. The continued use of the 1979 results as a basis of the acceptable level Australian Noise Exposure Forecast contours for residential and other activities and the development of the Australian Standard 2021 must be reviewed. Council supports the additional investigations into alternate methods of explaining and describing the noise events, but considers that after the passage of almost 45 years, it is time to reconsider the basis of the noise acceptability frameworks.

The complex information used to show noise impacts requires a simplified explanation of the framework and ANEF contour creation, and the understanding that noise events will still occur outside the contours, and that the proposed additional use of the N Series maps must more readily show the differences of noise presentation to the public, and the reasons why and their impacts on the residents. The requirement to use the ANEF contours as the planning tool is not necessarily helpful to the community, particularly when each Master Plan prepared by the Airports results in a shift of contours. There is much time and effort spent by the Local Authority in dealing with the public as a result, and local access to information should be made easier to access and understand.

A recent meeting between Parafield Airport and the Mayor, Chief Executive and senior staff was held at the request of the airport in order to meet its obligations in preparing the next Master Plan. It was appreciated that the airport informed the Council and explained the differences in its new modelling, but very disappointing to realise that it was information presentation, and not a consultation exercise which could incorporate further discussions on what might be achieved by both parties to improve the situation.

The use of Ultimate Capacity modelling for an airport is considered to better inform the community and Council and does not result in changing parameters for building limitations and acoustic treatments to meet the required construction standards. The existing methodology of using the changing ANEF for each Masterplan iteration results in community confusion and frustration, and adds to the construction burden for newly affected areas. It must be realised that retrofit requirements are more expensive than new builds, and contributes to the regulatory burden of Council in this instance for a matter created by the Federal Government.

The City of Salisbury is concerned with ensuring housing affordability for its community, and the increased construction costs associated with acoustic compliance only adds to the difficulty in housing accessibility.

In South Australia, the noise contours are inserted into the state-wide planning scheme and mapping, and requires construction compliance.

The City of Salisbury experience with the community consultation mechanisms has been acceptable, but considers improvements can be made to how the comments have been dealt with by the airports in the proposals. Likewise, the membership of the Consultative Committee could be considered for a wider membership than currently exists.

Improved and heightened awareness of indigenous interest in on-airport lands should occur through the Airport Master Plan process, and a Reconciliation Action Plan should be made part of the Master Plans for airports.

#### **General Aviation**

The most significant impact on the community of Salisbury is the Flight Training schools due to the number of flight movements compared to other aircraft movements. Continued and increased use of Flight Simulators is to be promoted.

There must be a consideration of a maximum usage of flight training movements of an airport in regards to the impact on the community. The continued transition to electric aircraft for flight training must be promoted.

#### **Fit for purpose agencies and regulations**

Supports.

#### **Emerging aviation technologies**

Supports and encourages the commitment to grow local aircraft manufacturing capability. The City of Salisbury has a strong background in manufacturing and business in its area, and has the Polaris Business Development Centre located in Technology Park, adjacent to Parafield Airport. It provides business support and programs, promotes innovation and local network creation and engagement and collaboration across industry, government, education providers and research organisations and can assist at the local level in skill identification and training.

**Future industry workforce**

Supports the long-term approach to skills identification and training to recognise the new technologies.

**International aviation**

Supports.

Council invites the consideration of these comments into the preparation of the White Paper, and wishes you well in the deliberations.

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Peter Jansen

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