

From: AAAAFOC – Australians Against Aviation Academies Flying Over Communities:
A coalition of opinion from Residents, dissatisfied with Parafield
Airport lack of consultation
AAAAFOC@gmail.com

To: Adelaide Airport Management Centre
1 James Schofield Drive
Adelaide Airport SA 5950
August 3rd, 2009

Re: Parafield Airport Master Plan Consultation

To Dear Parafield Airport Ltd,

We have prepared a submission querying your Parafield Airport Master Plan.

There are also about 40 questions that we hoped the Parafield Master Plan would address, but found it lacking. Please help, it would make your master plan more meaningful from a local civic Citizens' point of view.

It appears airport 'Community Consultation' process is minimal. The Parafield Airport public meeting was advertised on its 11th hour, was cut short by CEO Baker, after residents raised repetitive flight training noise pollution problems. Your master plans were also not readily available when they ought to have been, and \$50 for a copy of your rhetoric is a bit too much for me to bear, but we managed to borrow a copy.

We oppose many parts of the sheer irresponsible Parafield Airport Master Plan proposal. It seems little more than an exaggerated Airport operator's fanciful wish list, maximising profits while disregarding those adversely affected. It contains many ambiguous and inaccurate biased claims. It should not be fully signed off before a socially responsible National Aviation Policy is finalised, that hopefully offers surrounding residents reasonable protection from untethered excess of unessential airport operations – like mass flight training that should be done elsewhere. This is the case at Parafield Airport where 90% of movements are **not** the consequence for local aviation needs, but foreign profiteering interests. This effectively imports foreign pollution over our residential areas. The pollution is very significant and causes sickness. You are very aware of this yet your Airport Master Plan hardly mentions those facts in any clear manner.

It is also long known by professional pilots and the Australian Office of Airspace Regulation studies, that the Parafield Airport training airspace is too small and congested. The recent finding of two training aircraft mid air collision being attributed to sun-glare is partial nonsense and warrants a review – too many aircraft in the same congested area are accidents waiting to happen. Sun glare always can happen when sunny. You know this, yet you still push for a ridiculous and dangerous 450,000 aircraft movements per annum flown by mostly inexperienced training cadets. **Why?** You should review this, but precedence indicates your 'independent' consultants' won't do anything critical affecting your bottom line unless they are compelled by law to do so. This demonstrates your disregard for surrounding communities, favouring your own and foreign interests over the well being of a majority. Your stance is 'un, if not, anti Australian' and a social disgrace. **We would appreciate a detailed response how you substantiate 400,000+ movements as acceptable given that Parafield Airport is surrounded by residential homes, where we estimate over 50% were built many years before any mass flight training academy was ever conceived for Parafield. You know this. Are you going to offer noise proofing, or compensation?**

The Parafield Master Plan **claims that noise effects are few is not credible. How did you come up with that statement?** Repetitive low flying aircraft (planes and Helicopters) trainees often fly over the exact same homes practicing circuits, yet in PACC meetings you and Airservices attempt to downplay the validity of the complaint from the people that make the effort to regularly complain. Years of 'learned helplessness' by complainants giving up by being ignored does not mean relentless Parafield aviation pollution ceases to affect them.

We fail to see any references to any independent public health input about the adverse consequences about airport noise pollution. It is of no use to pass that responsibility onto the State. You know their input is inadequate, it does not make it legitimate to pollute peoples' homes. Ignoring that fact demonstrates your lack of concern for the surrounding community. **Why is there no independent Public Health input/reports about putting 450,000 movements over homes?**

You claim your main 'Environmental Consultant' is independent. Perhaps you may disclose what you pay him, so we can better gauge how independent he is. We gather he is Russell Synnot, who also Chairs the Parafield Community Consultative Committee. As far as resident representation goes the PACC is a farce, and the Chair is hardly independent, showing no interest in studies about adverse effects on noise, and consistently engages complexity to cover up the truth of problems. **FTA fly over one hundred flights per hour, every hour, each overflight often are +80decibel intrusions, over extensive residential areas for 14 hours per day, till well after dark. This trespass is what your master plan promotes. Do you think that is acceptable?**

Your 20ANEF contour covers perhaps over 30,000 homes, yet the master plan does not clearly explain what 20ANEF means. **We hardly know anyone that really knows what 20ANEF means, why does the Master Plan not clearly explain it?** We understand it to mean that more than 10% of people will be severely effected by noise to the point of illness, or need to move. This is quite serious, and again your Master Plan's omission of clarity demonstrates your lack of concern towards surrounding communities.

The ANEF model was developed with a jet aircraft fleet mix, and now for well over 10years, it is known that the current unrevised ANEF modelling is inadequate for repetitive circuit training noise caused by propeller aircraft, which increases the annoyance by about 5 ANEF points. 20ANEF will have the same adverse consequence as 25ANEF, where **over 15% if people will be seriously effected. Why doesn't your Master Plan make this clear?** You are informed of this, but **has that been factored in your noise contours?** We believe not. **Are you going to compensate the hundreds of people whose lives you are ruining by encouraging inappropriate amount of movements?** We also wish to oppose that your noise plot modelling aircraft fleet mix is not based on a true representation of all aircraft used at Parafield. The faulty Diamond DA42s were supposedly quieter, but may be now fitted with different engines, which will render your modelled Master Plan noise plots inaccurate.

Are you going to recalculate the noise contours?

The faulty Diamond aircraft were allowed to operate over housing since early 2007. 13 instances of engine failure were reported, faults were not remedied, yet it took two years to ground the aircraft. **When was PAL first aware of this problem?**

Helicopters and training aircraft do not fly at 1000 or 1500 feet, they often fly much lower, and that remains unmonitored. **What heights for rotary and fixed winged aircraft are your noise plots modelled on?** Low flying is a typical practice which intensifies the noise over a smaller area, driving those people underneath mad, while people living a block away do not get a true perception of what is happening. These realities remain unreflected in your noise charts, as you refuse to install permanent noise monitoring stations under flight paths, or ensure all circuit movements are tracked. You agree aircraft transponders should be switched ON, not switched to standby, so **what is in place to ensure all flight training operations will have transponders always switched ON?** Amongst the noisiest single polluters, are the 'Warbirds' and other helicopters. We have had weekends ruined by them alone. Both are not in your fleet mix for noise forecasting.

Are you going to include these noisy pests in your fleet mix for noise modelling?

You propose to have 55%, or is that really 5 + 5, or 10% of aircraft movements to be Helicopters. This is appalling, the current helicopter training regime is already a nuisance. That was imposed with hardly any consultation, and can also be done elsewhere. We recall another info article about helicopter training in a "Silent Achiever" business section of our newspaper titled "Silent Running", another insult by our biased media. A pro aviation Newscorp media that never publish the full facts about Parafield Aviation risk, foreign Chinese flight training pollution, and adverse health affects about constant noise imposed over our community that settled here first. Bit like your Master Plan. The training helicopters fly circuits with the fixed winged aircraft at the same time, adding to congestion, compounding the danger over peoples' homes. **Would you accept this imposed over your homes?**

As in your last master plan proposal, actual aircraft movements are not shown, only forecasts. Your Management appeared not to know the actual airport movements at Parafield by about 30% during the last Parafield public interest meeting. There is good reason to believe that actual movements are underreported, especially flight training operations occurring after operating tower hours.

Are actual aircraft movements known? HAS PAL asked all flight training operators for their actual flight movements?

More importantly, the definition of a circuit, or a touch and go in terms of movement numbers has apparently changed between master plans. Traditionally a 'touch and go' was considered as an arrival and departure. This would be a reasonable definition for off airfield pollution impacts, and public consultation purposes - as that that is a truer representation of actual flight pollution.

Does your noise modelling process use the above definition of a movement for all circuit operations?

Defining a flight circuit more equivalent to one movement fudges actual flyovers twofold, for a given movement number. That is a lot of pollution, imaginary airport capacity, potential foreign profit and risk, a big fudge for all! It seems you insist using Airservices data for movements. This is grossly inaccurate, particularly after hours. Airservices claim they estimate movements by monitoring radio traffic for out of tower times. That may be fine for the occasional general aviation, trying to find a clear path to land amongst the cloud of mass circuit training, but FTA hardly use radio communications during mass circuit training operations. We think they may be embarrassed demonstrating lack of English language skills. This is clearly inadequate and another avenue open to abuse. Other secondary airports like Moorabbin, Archerfield, Jandakot, Bankstown, do not solely rely on Airservices data for flight movements. Your consultant must know that.

Why do you not ensure to obtain, and inform us, of accurate flight movement data, especially outside tower hours?

As with potentially underreporting of movements, there is a serious potential of under reporting of incidents, also particularly outside operational tower hours. The Australian Office of Airspace Regulation studies and many professional pilots concur that there are concerns about Parafield. The disparity in the Australian Transport Safety Bureau records between day and night incident reporting at Parafield is in itself staggering, and that already been brought to your attention. **What is in place to ensure diligent reporting of incidents, or 'occurrences'?**

It would appear that if the Hong Kong owned Flight Training Group Academy is so essential, then **what does FTG pay for its facilities at Parafield?** Or is that 'commercial in con', if so, **what proportion of total airport revenue does FTG contribute?** It is known it is small compared to your non-aviation ventures, so **why are you allowing, or not discouraging foreign interests to pollute and harm surrounding neighbourhoods?** You know that 99% of complaints are because of FTA operations.

Foreign owned FTG's '2dollar' subsidiary company, Flight Training Adelaide virtually run 90% of aircraft movements at Parafield. **What insurance is in place for an off-airfield FTA flight training accident?** As far as we are aware, all those responsible can walk offering the victims nothing. You claim to be neighbourly, so **what is in place for such events?**

There seems little substance to claims that air quality is acceptable. Prior Master Plans admit that measurements are not representative of local area. You are aware that the nearest State air quality measuring stations are located at Hampstead and Elizabeth. Both these are over 10 kilometres away from Parafield. The millions of litres of fuel burnt by mass flight training contains a lot of lead and other pollutants that get spewed over surrounding areas. Knowing that the State EPA data is out of date, **What air quality measuring is done around Parafield Airport?**

The heavier contaminants, particularly lead, accumulate in the water system. You claim to monitor macrophytes to monitor water quality. We cannot find any meaningful studies with relevant data about this method of contaminant monitoring for Parafield Airport. Like the simplicity of measuring noise dosage, here is more inconclusive complexity, possibly to cover up more problems. Since Parafield is on a gentle slope, what could be simpler than sampling water from appropriate drains, so **Is this being done? If not, why not? If so:**

What is the Lead concentration, in parts per million from water entering Parafield Airport?

What is the Lead concentration, in parts per million from water running out from Parafield Airport?

How does this effect the vernal pools and storm water harvesting?

The Parafield Master Plan claims to be environmentally conscious and scrupulous, concerned about heritage, etc. etc. Historically this was large gum country. There are still a few surviving local redgums about, several hundred years old. Freshwater springs existed on or around Parafield, they were extensively used and populated by Aboriginal people. There are living and burial sites around Parafield. These places are an accrual of thousands of years of human presence. What we see today is nothing of what it was like. Trees removed, springs filled, wildlife vanished and most bird life destroyed in fear of 'bird strike'. Hardly heard of bird strike being a serious problem at Parafield before mass flight training for novices started.

What recognisable aboriginal cultural heritage surveys and studies have been done for your developments?

The Parafield Master Plan claims the airport is good for jobs etc, but many more sustainable jobs would exist if the airport was moved to an appropriate location. Job number claims need to be distinguished between commercial, general aviation, foreign flight training roles. After construction, jobs from Parafields' commercial developments displace jobs from smaller businesses that cannot compete on scale. Jobs should be quoted in terms of full time equivalents, (FTE - that is 36-40 hours per week).

How many Parafield Airport FTE jobs are directly Aviation related?

How many Parafield Airport FTE jobs are directly in FTA training?

How many Parafield Airport FTE jobs are directly related to completed commercial ventures?

How many Parafield Airport FTE jobs are directly related to airfield infrastructure management and maintenance?

Finally, you should make available our public submissions, perhaps on the Internet with private information removed. Then we can read other points of view, like Canberra Airport has done with its Airport Master Plan Consultation Process. You did not do this with your last Parafield Master Plan Consultation process. Having seen some of your responses to prior concerns submitted by suffering people, it seems that you merely fob off their plight, control their submission attempting to avoid people sharing their adverse airport experiences. Publishing submissions may partially remedy that perception.

If you do not publish our Airport Master Plan submissions, why not?

Why should Canberra residents get superior avenues of public consultation?

Thank you for taking this aboard, we hope this leads to a socially acceptable, healthier and responsible outcome. We suppose pigs can fly, swine flew, yet another adverse attribute from aviation, global pandemics – do your master plans consider preparing for that?

Yours faithfully, Brian, care of:

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