

Submission re: AVIATION GREEN PAPER

by AIRPORT MONITORING GROUP
Fraser Coast, Queensland
February 2009

Submission
Aviation Green Paper
Department of Infrastructure, Transport,
Regional Development and Local Government
GPO Box 594
CANBERRA ACT 2601

Airport Monitoring Group, Fraser Coast,

URANGAN QLD 4655

Signed on behalf of AIRPORT MONITORING GROUP - FRASER COAST

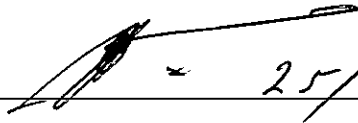
ROSEMARY JOY SKINNER
CO-ORDINATOR
(Name - Print)

RJSkinner 23-02-09
(Signature, Date)


DORSEN MARY WRIGHT
(Name - Print)

D.M. Wright 23-02-09
(Signature, Date)

JOHN NEVE
(Name - Print)

 25/2/09
(Signature, Date)

BIRGLEN REDEMBACH

 25.2.09.
(Signature, Date)

Name and address AIRPORT MONITORING GROUP Signature: per PJ Skinner Date: 25-2-09
of person submitting: U-RTSKINNER, J CO-ORDINATOR
I / We hereby request:

1. That steps be taken to ensure that the living conditions of existing residents and/ or community participants are in no way lessened due to expansion of activities at an existing airport, or expansion of the airport - such activities to include the conduct of aircraft and other vehicles, or people, using the airport or flight paths.
2. We request that safeguard clauses be included in all legislation, regulations and other relevant documentation to ensure that existing residents and/or community participants do not suffer from diminished living conditions, from any source, due to expansion of an airport, activities conducted thereat, or aircraft or vehicles using the airport or flight tracks. We make this request based on negative experience due to local Councillors lacking knowledge about, or expertise in, aviation.
3. We request the establishment of an accountable and authoritative body (eg: board or committee) to which all applications for change in existing operations or structures at airports, and development applications, be sent before being forwarded to local Council for approval.
(eg: Introduction of increased jet services, changes in flight paths, extension of runways, application by a flight training school to set up operations, construction of workshops, etc.)
The foregoing to include publication of results and a clearly defined appeals timeline and process, available to the public.
4. We request that a checklist, flexible to allow addition to suit particular cases, be devised. The checklist would need to include all items that may be vexatious to existing residents - eg: a detailed breakdown of the residents/community participants within the affected area whether noise regulations would be met; environmental issues (eg: effects and dissipation of fumes) etc. We request that the 'affected area' should be no less than a six (6) kilometres radius around any airport, or further afield if effects can be proved (eg: by those living under or near flight paths) or are stipulated in literature based on professional research (eg: medical or aviation journals, or case studies), or recommended by respected entities such as The World Health Organization, medical practitioners, environmental scientists, etc.
Should the checklisting process show that living conditions of existing residents/community participants are likely to be lessened, then the application would not be forwarded to the local Council.
5. We request that all airspace over land have clearly defined parameters within which aircraft must operate - eg: minimum altitude should suit population density.

BACKGROUND

The Airport Monitoring Group, Fraser Coast, was formed in response to residents' concerns when they became aware that Fraser Coast Regional Council was considering an application for a flight training school to operate out of built-up areas in the region. Some residents' claims brought about by the extension of the Hervey Bay airstrip to jet length, approximately three years ago, are still to be settled.

Prior to amalgamation of councils in Queensland, in March 2008, Maryborough and Hervey Bay each had its own elected council. The flight training provider company had applied to the Maryborough Council prior to amalgamation, and then reapplied to Fraser Coast Regional Council following amalgamation, to base its operation at Maryborough airport. Maryborough and Hervey Bay are approximately forty (40) kilometres apart.

Lead-up publicity, plentiful in the only local daily newspaper, repeatedly referred to 'the flight training school to be based at Maryborough' or words to that effect. It focussed on assumed monetary benefit to the local community, jobs that would be created, the type of aircraft to be used (portrayed as small and quiet). One field day was held at Maryborough airport. We now realize that initial publicity was probably purposely superficial. We heard/read/viewed no mention of Hervey Bay airport being involved, the number of aircraft movements per day, or night flying, or any possible ill effects on residents.

(It has now been verified that approx one hundred [100] take offs and landings per day were forecast. As it was to be a fifty (50) year lease, it is surely reasonable to predict that the company would want to expand in that time and the number of aircraft movements would increase.)

At a social gathering, in conversation with an experienced local pilot, a Hervey Bay resident was told that take-off and landing, and night flying practice, would be based at Hervey Bay airport. A figure of "at least sixty (60) per day" was stated. On questioning, it was explained that Hervey Bay airport was to be used because it had a jet length strip, and monitoring equipment was to be upgraded. Lecture rooms, dormitories, cafeteria, bar etc. would be located at Maryborough and initial/preparatory take-off and landing instruction would be conducted there, but the bulk of practice would be done at Hervey Bay.

Residential properties back on to the airport boundary and residents already suffer ill effects from commercial jets and light aircraft which use the airport. Over three thousand (3 000) students attend schools within a five (5) kilometre radius of Hervey Bay airport and similarly in Maryborough. Also affected, are residents living distant from the airport but under the flight tracks which traverse the full length of Hervey Bay. Aircraft often fly very low over residences under the flight path which include aged care facilities and child minding centres. Group members have photographed planes flying lower than a tall tree in their house yard.

In an effort to gain further and accurate information, the resident made enquiries to no avail at Council and then contacted the office of the local State MP and aired concerns. When "sixty (60) per day" was stated, it was corrected with, "We've been told one hundred (100) per day." The resident and a friend did their best to inform others. They distributed leaflets via letter box drops, phoned in to talk-back radio and spoke in public forum at Council asking Councillors to consider carefully and research all possible ramifications before deciding on the flight school's application. As word spread, the Airport Monitoring Group was formed and public meetings were held at a local hall. The group researched, gathered information and actively campaigned against the flight training school's application being approved. The only local daily newspaper continued to promote the flight training school and gave scant coverage of existing residents' concerns. As residents of Maryborough became more fully aware of what was planned, many of them, too, were perturbed and joined the group's efforts. However, many residents, to this day, do not realize the magnitude of ill effects that would have been forced on to them had the flight training school gone ahead.

Eventually, the company's Managing Director issued a statement via the local newspaper that their application had been withdrawn. Three reasons were stated: Council taking too long to approve the application; the economic downturn; lack of public acceptance.

With the withdrawal, information nights were cancelled. Many of the questions raised by our group remain unanswered. From the information elicited, we believe that some Councillors were prepared to vote in favour of the application, allowing the flight training school to go ahead, without having informed themselves of, or considered, the **effects on existing residents**. Whether this was purposeful, or due to naivety, we do not know. It does, however, show the need for safeguards as outlined in our requests numbers 3) and 4).

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Many of the adverse impacts on communities and the environment, which are of concern to members of the Airport Monitoring Group who are residents of the Fraser Coast where a flight training school is seeking to set up operations using airports located in existing built-up residential areas, are acknowledged in the Australian Government's green paper, National Aviation Policy Green Paper, December 2008 - eg:

"While there is no doubting the invaluable service aviation provides , the Government recognises that it is not without impact on communities and the environment. Minimising that impact, particularly in terms of noise and air quality, has been a challenge for some time" (National Aviation Policy Green Paper , December 2008, p. 44)

"Promoting a proper dialogue between airports and the communities around them on issues such as the impact of aircraft noise;" (National Aviation Policy Green Paper , December 2008, p 9)

"The Australian Government is developing a decisive national action plan on climate change to reduce greenhouse gas emissions ... reduce the impact to climate change, and to help shape a global solution. the Government is committed to including domestic aviation in the coverage of the scheme..."

"... future improvements in fuel efficiency will not be sufficient to counteract the extra emissions generated by a growing industry." (National Aviation Policy Green Paper , December 2008, p. 18)

"... efforts by air navigation service providers to introduce ... and innovative approaches to reducing emissions ..." (National Aviation Policy Green Paper , December 2008, p. 19)

"... However, given the anticipated strong growth in demand for aviation services, these improvements will only partially constrain the industry's growing global share of emissions." (National Aviation Policy Green Paper , December 2008, p. 182.)

Impacts on community health are a major hazard for existing residents as activity at Fraser Coast airport expands. These concerns are justified, particularly in light of the following:

"With no alternative 'clean' fuel likely to be available in commercial quantities in the immediate future, aviation is expected to remain dependent on kerosene for some time." (National Aviation Policy Green Paper , December 2008, p. 184)

As demonstrated in the following extract from a fact sheet published by the United States Environmental Protection Agency, it is accepted that aviation engine emissions can be responsible for respiratory health problems. NO_x and CO are produced by aircraft.

"NO_x is harmful to human health and the environment. Nitrogen dioxide, a form of NO_x, can reduce pulmonary function and increase airway irritation in healthy people as well as individuals with pre-existing pulmonary conditions. The risk of respiratory illness appears to increase in children exposed to nitrogen dioxide. ..." ...

"... CO also has significant human health effects. CO enters the blood stream through the lungs and reduces delivery of oxygen to the body's organs and tissues. Persons with heart

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disease are especially sensitive to CO and may experience chest pain when breathing CO. Infants, elderly persons, and individuals with respiratory diseases are also particularly sensitive. CO can affect healthy individuals, impairing exercise capacity, visual perception, manual dexterity, learning ability and the ability to perform complex tasks."

(United States Environmental Protection Agency, [1997] EPA Environmental Fact Sheet, <http://www.epa.gov/otaq/regs/nonroad/aviation/aircr-fr.pdf>.)

With this medically confirmed knowledge, surely it is wrong to allow expansion of activity at existing airports in built up residential areas - eg: introduction of a flight training school to Maryborough-Hervey Bay, Fraser Coast, Queensland. In less than a six (6) kilometre radius of the airport where one hundred (100) take-off and landing practices per day are planned to occur, there are approx 3000 students attending schools; child care centres; aged care units. Residents include families with children, people with disabilities, the aged and those who live alone with no support should illnesses occur or be aggravated. The flight paths traverse built up areas and planes fly at very low altitude.

One must ask whether local councils have a duty of care which includes protecting the health of existing residents, and if so, why the Fraser Coast Regional Council has extended an invitation for the flight training school to reapply to conduct its operations on airstrips close to built-up residential and busy community areas as outlined above.

The undertaking, "*The Commonwealth Minister will retain final decision-making authority for land use planning and development on-airport.*" (National Aviation Policy Green Paper, December 2008, p. 31) is welcomed by the Airport Monitoring Group, Fraser Coast. We request that this power be brought forward and applied to prevent the flight training school application from being considered by Fraser Coast Council until after the finalisation of this inquiry and implementation of changes arising therefrom.

In light of the Government's clear commitment to ensuring safe environments exist at and around airports:

"The Government proposes to work with state governments to refine proposals for effective working arrangements, including the key initiatives outlines below:

- *establishment of a clear policy on the definition of public safety zone areas around airports, which can be taken into account in local planning.*

(National Aviation Policy Green Paper, December 2008, pp 17, 18)

- *developing a clear policy on the definition of public safety zones around airports which can be taken into account in local planning with a view to ensuring that the community is not exposed to any undue level of risk from aircraft operations; and*
- *developing strategies and plans to address other airport related issues such as aircraft noise, traffic linkages, and best practice community consultation models.*

Airport Monitoring Group's experience is that the public safety zone around airports should cover at least a six (6) kilometres radius from the airport.

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Given the breakdown of the population within a six (6) kilometre radius of Hervey Bay - Maryborough airports, including thousands of school aged children and teenagers, the necessity for the Government to have introduced random drug and alcohol testing for the aviation industry raises concerns. A good mix? No, not for safety reasons or role model example. For this to be necessary, there must be a risk:

"The Government has already undertaken important initiatives through:

- *the introduction of random drug and alcohol testing for the aviation industry, with mandatory drug and alcohol management plans; "*

(National Aviation Policy Green Paper , December 2008, p. 24).

Risk in the area of security is acknowledged by the security measures taken, or to be taken. *(National Aviation Policy Green Paper , December 2008, p. 93)*

Airport activity in areas where residences, schools, child care centres, aged care facilities or similar are located should be minimised. Escape to a main road should a traumatic situation spread from airport to adjoining residential area could be impeded, for example due to the layout of some of the estates - eg: dead end streets (eg: Hervey Bay). In Maryborough, many surrounding houses are old wooden buildings which would ignite easily - eg: from air borne sparks.

Tied with the issue of ensuring compensation "*reflects contemporary community standards*" in the Australian Government's review, *(National Aviation Policy Green Paper , December 2008, p. 30)* there needs to be incorporated, guidelines to compensate residents for personal and/or property damage where the source of the harm was at an airport or originated from an aircraft. The process should not be an arduous one for the resident. This issue could be minimised by not developing or expanding airports, or use of them, near residential areas.

The impact on human health of noise is acknowledged in the greenpaper - eg:

"Aircraft noise disturbance arises as much from the number of aircraft movements and lack of respite , as from the loudness of individual flights."

".... Many residents tens of kilometres from airports are disturbed by aircraft noise. Urban encroachment and the increase of airline and other aviation activity at secondary airports have increased community exposure to aircraft noise. "

(National Aviation Policy Green Paper , December 2008, p. 19)

"Access to transparent and easily-understood aircraft noise information is lacking. Traditional approaches to measuring aircraft noise no longer meet the expectations of the community and industry. Planners, or those exposed to aircraft noise and noise contouring techniques often exclude those communities living outside the contours from assessment processes and participation in the noise debate." (National Aviation Policy Green Paper , December 2008, p. 19)

" ... planning for the impact aircraft noise can have on those living near airports and under flight paths." (National Aviation Policy Green Paper , December 2008, p. 34)

"ensure a national land-use planning regime is put in place near airports and under flight paths to avoid noise-sensitive developments being located in these areas and to protect

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communities from excessive levels of aircraft noise." (National Aviation Policy Green Paper , December 2008, p. 35)

Care must be taken that following consultation, a 'cope with it' mentality does not prevail as the impacts from noise can be insidious.

Parliamentary Office of Science and Technology, postnote (June 2003), *Aircraft Noise*, p. 2., <http://www.parliament.uk/post/pn197.pdf> states effects from aircraft noise include:

"stress, anger, interference with conversations and leisure activities in the home, disrupt activities requiring concentration, and discourage people from using outdoor spaces, sleep disturbance, cardiovascular effects, mental health, educational achievement."

If night curfews must be put in place in areas where expansion of activities at an airport affect existing residents, then a 5pm or 6pm curfew starting time through until 9am, or longer, should be considered. Surely it is reasonable for existing residents to have their evening meal, television viewing or radio listening, and evening 'family time', and their morning 'family time' without interruption from aircraft noise - remembering that these residents were entrenched in the area before the airport expanded its activities.

Acknowledgement that the impact of aviation emissions is a well recognized risk, the ramifications of which are still being fully understood is evidenced by the following:

"The Australian Government recognises the importance of addressing climate change as a focal point of transport policy for this and future generations.

... managing the climate change impacts of aviation

... minimise the carbon footprint of aviation;

... address ... aviation emissions

...working towards a better understanding of aviation emissions and their impact, ...

... assisting all economies in the region to respond to the need to reduce their carbon footprint" (National Aviation Policy Green Paper , December 2008, p. 34)

"With no alternative 'clean' fuel likely to be available in commercial quantities in the immediate future, aviation is expected to remain dependent on kerosene for some time." (National Aviation Policy Green Paper , December 2008, p. 184)

"... working towards a better understanding of aviation emissions and their impact, including through the development of tools for comprehensive carbon monitoring and foot printing; ..." (National Aviation Policy Green Paper , December 2008, p. 186)

Surely, with this uncertainty, it is irresponsible to allow expansion of activities at airports where existing residents could be affected, as could those under flight tracks.

It has been established and acknowledged by the scientific community and governments that NOx and CO emissions are generated by aircraft engines:

"NOx contributes to acid rain which affects both terrestrial and aquatic eco systems, including acidification of waters, reductions in fish populations, damage to forests and wildlife, soil degradation, and damage to materials, monuments and buildings. NOx is also a precursor to ozone which affects both biological tissues and man made materials. Ozone affects human

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pulmonary and respiratory health and causes damage to forests and vegetation. NOx emissions could also form secondary particulate matter, which causes detrimental health and welfare effects.

EPA Environmental Fact Sheet (United States Environmental Protection Agency, [1997])

EPA Environmental Fact Sheet, <http://www.epa.gov/otaq/regs/nonroad/aviation/aircr-fr.pdf>

The proven effects of acid rain, ozone and particulate matter must be a concern in an ecologically fragile area such as the Fraser Coast, including Hervey Bay, the Mary River and Fraser Island where it has already been found necessary to impose strict guidelines to protect the environment. The need to attract tourism has oft been cited as justification for the impost of these strict guidelines and regulations. How then, can the Fraser Coast Regional Council be justified in inviting a flight training school to reapply to operate in the region?

While it is admirable that the government sees residents' and community input as desirable, "... *better education and information-sharing...*" and advocates for community consultation (National Aviation Policy Green Paper, December 2008, p.190), care must be taken to ensure that having done this, the 'cope with it' mentality does not take over. An appeals process needs to be determined and broadcast to allow easily accessible and orderly challenge to any decisions made by any committees, or similar, established.

The composition of any committee, or similar entity, convened to handle residents' complaints must be diverse enough in make-up to ensure it is above being compromised or corrupted on any issue. If the composition of such committees is localised then it is easier for local politics to play a part and for such compromise or corruption to occur.

We, the Airport Monitoring Group, are simply a group of concerned existing residents trying to prevent erosion of our living conditions due to expansion of activity at Hervey Bay and Maryborough airports. We ask that the review of aviation in Australia addresses our concerns and puts in place safeguards to ensure no resident is harmed by the insidious side effects and issues connected with aviation.

AIRPORT MONITORING GROUP - FRASER COAST
24 February 2009