

Aviation White Paper Branch
Domestic Aviation & Reform Division
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

By email: aviationwhitepaper@infrastructure.gov.au

Dear Sir/Madam

RE: Submission to the Aviation White Paper – Terms of Reference Review

Introduction & Background

I am a member of the Hume Residents Airport Action Group (HRAAG) which has represented the interests of local residents of Hume since 2012, on airport issues. HRAAG has widely engaged with residents of Hume and Keilor, through regular community meetings. HRAAG continues to make representations to all levels of government and contribute to policy submissions in the public interest. We welcome this opportunity to offer views and opinion in a co-operative spirit on matters having direct impact on our residents by airport development.

The Terms of reference for the white paper review are far and wide reaching, our submission will focus on airport planning, consultation processes and noise mitigation. The best way to convey this is by reporting what is being experienced by local community.

We start with our summary of events which are relevant to Melbourne airport. These are areas of shortcomings which affect resident communities, drawn from experience, having served on the Melbourne Airport CACG for a number of year and historical research.

Our community is not advocating the closure of Melbourne Airport, however we need a greater say in the expansion which has grown beyond the commonwealth planning for a 2145 ha (5,300 acres) to 2,740 Ha (6,800 acres) airport site, which impacts on us every day 24 hours per day. Local residents were informed the adjacent areas to the airport boundaries and beyond the runways, would be zoned for rural purposes (*Commonwealth Hansard 14 November 1968*)

Communities living in the vicinity of airports are very much part of the aviation industry, we live it, smell it, are disrupted by it and endure long term negative impacts every day, 24 hours per day.

Community Consultation

Our summary of events identifies a non-collaborative environment between local residents and Melbourne Airport, which frustrates local residents.

Since 2018 the public have been excluded from attending CACG meetings.

The Melbourne CACG holds closed meetings and members are discouraged from engaging directly with the public.

The Department of Infrastructure & Transport appears to have introduced their own interpretation of the *Airports Act* to allow public comment periods for airport master plan and runway MDP to be held concurrently, disregarding the consultation purpose and established historical practice at all other airports.

Communities have lost faith in the aviation consultation process, the CACG and our government authorities. There is not willingness to engage in a collaborative manner.

Community Consultation Cont.’

The minister would be well aware of the Brisbane Airport community concerns on consultation. These concerns are shared with many Australian communities affected by aircraft noise, including those surrounding Melbourne Airport.

Hume Councillors gave favourable consideration to the Melbourne Airport Third Runway MDP on the basis it is the largest rate payer, whilst giving advice to residents who are annoyed by aircraft noise should consider moving to other areas. This fails to take into account the fact that aircraft noise causes health and educational deficits, even in people who are not consciously annoyed by it. Residents should be protected from harm, not told to move, by their representatives and government authorities.

The Melbourne Airport third runway MDP consultation failed to:

- Recognise health impacts to local residents in the neighbouring municipalities, from the current and future airport operations.
- Identify the significant impact to health from increased aircraft noise.
- Develop meaningful strategies to reduce and mitigate off-site impacts of the present and future operations of Melbourne Airport.
- To adopt the ICAO balanced approach into the third runway MDP.
- To control noise impacts which exceed World Health Organisation (WHO) Noise Guidelines
- To ensure children under these flight paths would not experience cognitive delays.
- To ensure aircraft noise will not cause sleep disturbances, anxiety, depression and cardiovascular disease.
- to release the health study completed by Quigley & Watts 2018.

The health study completed for Melbourne Airport Third Runway in 2018 still remains secret.

A study peer review was conducted overseas, whilst community it reports on has never been given opportunity to debate issues of concern which may have been identified in the health study.

The findings from the health assessment by Taylor & Tonkin, commissioned by Brimbank Council for the Melbourne Airport 2002 Master Plan and Third Runway MDP found it did not adequately identify the environmental impacts, it imposes unreasonable and unacceptable health risks to community and it did not include adequate plans to address environmental and health impacts.

Airport Safeguarding

Melbourne Airport operations are safeguarded under the Melbourne Airport Environs Strategy (MAES) and overlays. A key purpose of the MAES includes a statement of intent,

- To assist in shielding people from impact of aircraft noise by requiring appropriate noise attenuation measures in dwellings and other sensitive buildings.
- To provide for appropriate levels of noise attenuation depending on the level of forecast noise exposure.

Most if not all residential land had already been sub-divided prior to the Melbourne Airport four runway plan of 1990 and the introduction of the MAES in 2007, this renders the purpose statement in the MAES without prospect of achievement. Furthermore, appropriate noise attenuation is to be installed at the owners' expense. Current estimates indicate this could be as much as \$50,000 per dwelling, a heavy financial burden for residents of some of Melbourne's most disadvantaged suburbs.

Where airports make payment in lieu of rates to LGA's, they do not receive rateable services, these payments are regarded as ex-gratia. There is no transparency on the expenditure and these payments, which would be better directed towards providing noise attenuation to residential properties impacted by aircraft noise consistent with ICAO balanced approach in addressing aircraft noise issues.

The MAES review of 2018 failed to evaluate the effectiveness of the strategy, or evaluate the number of residential dwellings fitted with noise attenuation to shield from aircraft noise as per the purpose statement of the MAES. The MAES terms of reference did not allow consideration of these matters.

Aircraft noise, sleep disturbance, health impact, loss of amenity are un-avoidable products of aviation, however the industry does not accept responsibility by virtue of economic benefit.

Recommendations

Measures to improve community trust.

A priority for this review is to restore trust with communities affected by aircraft noise, a co-operative environment and equality in the CACG process.

1. CACG chair should be totally independent and report to Dept of Infrastructure & Transport
2. CACG meetings to be opened to the public
3. Community representatives to be allowed to nominate proxy as other CACG members are.
4. Re-commence community consultation and public comment period for the Third Runway MDP, consistent with the Airports Act 1996. Master Plans and MDP are separate processes and each should have its own consultative process. Communities should have the knowledge of ministerial decisions when considering the runway MDP.
5. Appoint and fund a community advocate position to provide a much-needed resource and balanced input into airport planning.
6. Immediate release of the Melbourne Airport Third Runway health study completed by Quigley & Watts in 2018.
7. Immediately commission an independent assessment of the health impacts of the third runway against the WHO noise guidelines
8. Immediately commission an independent study for a whole of system review of how best to meet Australia's transport needs as we transition to the carbon neutral future
9. The commonwealth to set operating standards for the aviation industry to achieve the WHO noise guidelines.

Infrastructure

10. Extend the White Paper to examine all transport options not just aviation.
11. Immediately commission an independent study for a whole system review of how best to meet Australia's transport need as we transition to a carbon neutral future.
12. Amend the Airports Act 1996 to make it a requirement for Master Plans and Runway MDP to report on the number of residential dwellings, units and other sensitive development including compliance to AS2021 for the forecasted noise exposure areas.
13. Amend the Airports Act 1996 to include separate statutory public exhibition periods for airport master plans and MDP.
14. The Minister for Infrastructure and Transport to immediately commission a survey study into community reaction to aircraft noise, which was last updated in 1982.
15. Do not approve the Melbourne Airport Third Runway MDP pending assessment against the long-standing commonwealth and state government plans for an additional airport in the south-east of Melbourne and better utilisation of existing airport infrastructure at Avalon.
16. The Dept of Infrastructure to include the cost of supporting transport infrastructure, such as the Melbourne Rail Link and the Suburban Rail Loop as part of a cost benefit analysis and evaluate proposals against alternative aviation infrastructure to provide the best service in the public interest.
17. Incorporate into the Airports Act 1996 and NASF a requirement to satisfy all the elements of the ICAO Balanced Approach to Aircraft Noise Management are achieved.
18. Make public the reasons for the approving the Melbourne Airport Master Plan and the accompanying advice that was received to inform this decision and a copy of the response to APAM in approving the Master Plan prior to community consultation of the Third Runway MDP.
19. The Minister for Infrastructure and Transport to set capacity limits for all Australian major airports, to provide certainty for the industry and community.
20. The Dept of Infrastructure to include the cost of supporting transport infrastructure as part of a cost benefit analysis and evaluate proposals against alternative aviation infrastructure to provide the best service in the public interest.
21. Airport Master and Runway MDP to include the cost of supporting transport infrastructure as part of a cost benefit analysis and evaluate proposals against alternative aviation infrastructure to provide the best service in the public interest.

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