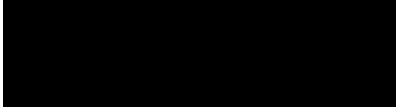


Tess Bignell



Community & Committee Representative

Samford Area Aircraft Action Group SAAAG
Brisbane Flight Path Community Alliance BFPCA
Airspace Advisory Board AAB

21st November 2023

Director Aviation White Paper Project Office

Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601
Email: aviationgreenpaper@infrastructure.gov.au

Dear Sir/Madam

Thank you for accepting my feedback for the Aviation Green Paper. As I attended the Aviation White Paper Terms of Reference Meeting in person in Brisbane. I was disappointed not to see anything specifically discussed and suggestions put forward from myself and the other Community Representative there on the day.

As a Committee Member of the BFPCA, I concur with their official feedback. This feedback is written in the spirit of protecting rural residential communities.

Chapter 2 – Likely future directions out to 2050.

The Aviation Industry must rise to be a socially licensed organisation. News articles all talk about doubling our population in Queensland. How can this be when Australia has so many other issues, like for example Housing, health, education, crime Infrastructure. Aviation expansion needs to move in a manner that is sustainable to our cities, communities and the people that live there.

Chapter 3 – Airlines, airports and passengers – competition, consumer protection and disability access settings.

The Chapter is covered by the BFPCA Submission.

Chapter 4 – Regional and remote aviation services

Regional and remote aviation are serviced by many smaller jets and general aviation aircraft. These aircraft are aged and using led based fuel. Example is the GAM out of Brisbane daily is 52 years old. Generally wakes all of Brisbane up on the way to Dalby. We need quality green aircraft for these routes taking more passengers, lessening the quantity of aged aircraft flying and their impact on overflown communities.

Chapter 5 – Maximising aviation’s contribution to net zero.

Mandatory Net Zero targets for the aviation industry must be legislated.

Examples of Greenwashing like tree planting should be a last resort after the aviation provider has proven they have exhausted all measures technologically available to them.

Airports should not be able to relinquish their obligations to Net Zero at the beginning or end of the runway. Mechanisms should be in place that airports are guardians for government to ensure that all aircraft using our airspace are flying to meet our green targets whilst using Australia's airspace.

Lead Based piston engine aircraft must have a use by date if not converted to greener technology.

Lead Based piston engine aircraft must be banned from over flying rural residential communities on tank water. Using Brisbane Airspace as an example. Brisbane uses the north west rural residential communities as a highway to virtually the rest of the world. Traffic to and from Brisbane Airport will be immense in years to come. What the government lacks in understanding is aircraft from Brisbane Airport is only one source of traffic out of eight layers, soon to be ten layers of aircraft movements. Here are the layers:

CONTROLLED AIRSPACE

1. Cross International Flight Path to and from NZ.
2. Amberley Jets coming to and from their training circuit etc.
3. Ascending Wide Bodied and Jet Aircraft from International and domestic sources.
4. Descending Wide Bodied and Jet Aircraft from International and domestic sources.
5. Turbo Prop and FIFO Aircraft
6. Helicopter – Careflight and general aviation.
7. General Aviation – Aged Aircraft on Lead Based Fuel to and from regional airports

UNDER CONTROLLED AIRSPACE – Under 1,000 feet

8. General Aviation – Aged Aircraft on Lead Based Fuel from suburban and regional airports

SOON TO INCLUDE

9. Air Taxi's
10. Drones

From virtually having only the top two air routes who fly high enough to not be a bother in the past. The remainder are having a huge impact on the community. Top of the list is the health impacts. Health to your citizens cannot be ignored. Lead traces are already being found in water tanks. This is a liability the Australian Government needs to stop in its tracks now.

Chapter 6 – Airport development planning processes and consultation mechanisms

The NCIS department of Airservices must operate transparently by:

1. Recording all methods of enquiry from the public in their statistics to present to government, including anonymous, email, phone and in person.
2. Reply to all enquiries in a timely manner. I am still waiting on replies from earlier this year.
3. Create a feedback process if the answer provided by Airservices is incorrect.
4. Record statistics on whether the public were happy or found the Airservices reply incorrectly answered.
5. Airservices NCIS have no measure in place to gauge whether they operate affectively.
6. Staff and resource Airservices NCIS affectively.

The ANEF System is outdated. The impact on communities has been immensely under rated therefore accurate planning by Councils are pathetically lacking. More greenspace is required for noise insulation.

The appropriate noise metrics for Community Impacts is either SEL or EPNL or similar. Community do not care for any averaged or weighted noise metric taken over a two kilometer distance as per the current experience. We experience the noise overhead and that is what should be published. I'm sure if Airservices were made to adhere to strict design noise principles like the WHO recommendations, ambient, topography examples to what is experienced by community, they would not be allowed to overfly quiet communities in both directions to and from the airport, giving us no reprieve.

Drone deliveries should follow infrastructure and deliver to depots, not private housing. The airspace is crowded enough and given the height above sea level we are, the lower airspace is very crowded.

When a new airport or runway is proposed, community impacted need to be advised by letter box drop detailing the changes. Currently the one letter box drop Airservices has done for Brisbane, missed a lot of communities and just came across as an advertising campaign by not describing how their property would be impacted. Mostly people just threw them in the bin.

Impacted residents need to be compensated by the Airport by posing a levy to passengers. This must attend to health and noise protections and the cost of moving houses.

Airservices and Airports need to tell the whole and complete story to residents. They need to behave transparently. Treat residents with respect. I've now learnt its often what they do not say, more than what they do say. Examples are:

1. Hidden 2018 Environmental Assessment from communities outside the 2007 Environmental Impact Statement. The PIR for Brisbane was deceptive at the least.
2. Dishonest conduct at Senate Estimates with no repercussions
3. Dishonest conduct by the Jetstar Representative as to the A320 Retrofit.
4. Full length runway departures vs interesting departures doomed to fail as no change of instructions or Way Points were given to Airlines and Pilots.

There are presently no consequences for Airservices behaving badly. Checks and balances need to be in place to ensure they reach the required outcomes.

CASA needs to be protecting the Airspace and overflowed community. No independent government body represents the people overflowed.

Airservices does not provide noise reduction statistics for flight path changes. Noise sharing is a failure when flight paths do not run parallel and meet or depart from an apex. For example, Shared Flight Paths overfly the same communities, increase concentration, are not adequately separated. 800 meters like the one proposed in the NAP4B is a failure.

Airservices modelling for heights of flight paths is not the same as experienced and are found to be approximately 3,000 above lived overflight. Why are these projected heights not enforced. Residents are making decisions erroneous data.

Flight Path Design principles consultation process was flawed. Brisbane and Sydney residents were not part of the consultation process. Pop up places were meant to suffice. This is not adequate.

Flight Path Design principles are not adhered to. Sensitive fauna and flora, Historical, First Nations significant areas, school, hospitals are all overflowed. Rural Residential areas are picked on because of their "in my opinion" sheer lack of voting power.

CACG's are useless for Community Representatives. Name one initiative that has come from a CACG for the community? CACG's are basically an advertising opportunity for the airport.

Airservices and Airports have zero consequences for getting it wrong. They take a wrecking ball to communities without any respect. They need regulatory oversight. Targets to meet from solid data on how they reduce their impacts. No smoke and mirrors.

Chapter 7 – General Aviation

Residents on Tank Water should not be exposed to traffic numbers above. This is a massive liability looming for the aviation industry and government. As per detail above.

Lead based fuel need to be banned by a certain date.

Aged aircraft need to meet modern technology standards.

Chapter 8 – Fit for purpose agencies and regulations.

This Chapter is covered by the BFPCA Submission.

Chapter 9 – Emerging aviation technologies

This Chapter is covered by the BFPCA Submission.

Chapter 10 – Future Industry Workforce

This Chapter is covered by the BFPCA Submission.

Chapter 11 – International Aviation

This Chapter is covered by the BFPCA Submission.

Thank you for the opportunity to make this submission.

Yours faithfully

Tess Bignell

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