

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

Dear Sir/Madam

Herewith my submission to the Aviation Green Paper 2023 consultation.

The first indication that this Green Paper is seriously deficient in not concerning itself with the welfare of the Australian people and maintaining the Australian way of life comes within the first three pages. The document refers to the actions that might be needed to prepare the industry for long-term growth but makes absolutely no mention of the importance of addressing noise harm, (medical, cognitive, and even safety the noise making it impossible to hear oncoming traffic), productivity harm, pollution harm, economic harm or safety risk that is caused by the low overflight of large sections of the community, in my case in Brisbane. That there is noise harm has been recognised by the Australian government and by the rather laughable attempt by Airservices to offer free mental health counselling for those affected by noise harm. That this is not a small issue is evidenced by the fact that approximately one third of the submissions to the Aviation Terms of Reference concerned noise. Aviation policy needs to be people-centric as it is obvious that the role of government is to support the welfare of the community against vested interests. Of course I recognise the importance of the aviation industry to productivity and connectivity but this end can be achieved without sacrificing the well-being of many of the Australian people.

A review of aviation policy such as this green paper is farcical when it categorically eliminates from consideration a cap or a curfew. It fails to consider that there are possibilities other than expanding the capacity of current airports that are causing so much distress to the community. It clearly indicates the narrow remit of ideas for aviation policy proposed by this paper.

The current system of regulation of the development and running of airports is failing.

That there has been complete failure of regulation of the development of airports is blatantly obvious from the fact that the development of airspace in Brisbane has resulted in two runways with a proposed 150 flights per hour pointed directly towards the most densely populated part of Brisbane, then continuing over a large number of the suburbs of Brisbane, including over over a large number of schools with the concurrent effect on cognitive ability and the health of our future generation. One might say that this latter effect on our children is being ignored borders on the criminal. So much for touting Brisbane as a “liveable city”. This failure of regulation can even be traced back 40 years when the airport was first being developed in its current location in Brisbane. Forty years ago tests on airport noise were overlooked during the airport’s planning. The Department of Aviation reported at the time that “Brisbane’s new airport will mean relief from noise problems .....”. But when the new runway opened “people were shocked to learn that its main runway was unsuitably aligned to allow take-offs over Moreton Bay. In its first 10 days of operation, the Department of Aviation received more public complaints about noise than in the previous 15 years of the old

airport's operation." (Sydney Tribune 25 May 1988). Yet here we are again with the regulatory oversight being insufficient to take account of what was already known, allowing a second runway parallel to the first runway whose direction had already been shown to be highly unsatisfactory. Indeed the long term planning for Brisbane Airport commenced in the 1970s. It is almost unbelievable that we could have ended in this current situation when the planning was commenced half a century ago. There were alternatives so many years ago and there are still alternatives that could be considered as part of an integrated transport network which would reduce the noise burden on the suffering people of our city.

That there is complete failure of integration of planning for residential infrastructure development with the development of airports is obvious from the fact that houses and apartments continue to be allowed to be built in airport corridors with damaging levels of noise.

That there has been a complete failure of regulation is obvious from the fact that BAC has not been compelled to comply with its representation to the community at the time of the assessment under the Environmental Impact Statement that the NPR would mitigate noise, that it would be better for Brisbane because it would enable flights to be over the Bay thereby representing that residential areas would not be overflowed at low levels cause noise nuisance.

Regulation needs to ensure that information given to the community is clear, comprehensive, transparent and lacking in ambiguity.

That there has been a complete failure of regulation is obvious from the fact that BAC was allowed to quietly drop its commitment in the EIS to have SODROPS as the main mode of operation during daylight hours. There is a complete failure of oversight when the BAC/Airservices default position is that the use of SODROPS is limited by the number of flights coming into the airport per hour. The default position should be that the number of flights per hour should be limited by the ability to use SODROPS. This was the community expectation from the representations by BAC during the EIS process.

That there has been complete failure of the Environmental Impact process and the monitoring of information that was, and is, being provided to the community, is obvious from the fact that the BAC flight path tool advised that there would be a maximum of around 7 jet flights per day over my area with a noise level of over 70dB (the BAC flight path tool omitting to mention turbo props) when my family can have that number of flights with noise approximating that level **in an hour**. It is a monumental failure of regulation that BAC was allowed to keep the forecast of the number of turboprop flights hidden from the public even though these aircraft have the same noise level as a Boeing 737.

That there is a complete failure of regulation is obvious from the fact that no new EIS was required when BAC announced its intention to develop the airport to the extent that it would support 150 flights per hour. This clearly is a monumental change from what was expected by the community.

That there is a complete failure of regulation is obvious from the highly critical report of the Trax consultants on reviewing the flight path development in Brisbane airspace.

That there has been a complete failure of regulation is obvious from the lack of analytical oversight or community input into the belated unregulated development of flight paths in the Brisbane airspace.

That there has been a complete failure of regulation is obvious from the fact that BAC was allowed to decommission the cross-runway which would have gone some way to enabling flight paths which did not impact on the Brisbane city residents.

That there has been complete failure of regulation is obvious from the fact no cognisance has been given to what level of noise should be considered as harmful. In particular, no consideration has been given to the World Health Organisation upper levels of 45dB during the day and 40 dB at night.

There is a failure of regulation when an EIS is not required to assess and publish anticipated noise levels over a community. Indeed there appears to be a reluctance to make a concerted effort to measure noise levels under flight paths and to link these to health, productivity and economic harm.

That there has been a complete failure of regulation is obvious in that no consultation was required as to whether there should be no curfew at Brisbane Airport.

That there has been a complete failure of regulation is obvious from the lack of specific noise limits for overflying aircraft. There is more regulatory protection from the odd noise from a lawn mower than from the constant overflying of aircraft.

That there has been a complete failure of regulation is obvious from the fact that the community has lost faith in Air Services as a protector of the welfare of the community both because of its duplicity evidenced from its private communication supporting BAC policy against the interest of the community and from its unsatisfactory complaints service, this latter being so unhelpful and unresponsive that people do not feel there is any point to submitting complaints. Its community engagement is commonly regarded as a PR stunt, and one designed to “soothe” the community regarding the noise impacts of BAC operations rather than to act in the protection of the community and effect real change.

In developing aviation policy, a more comprehensive review of the surrounding possibilities needs to be made, without being hidebound by the current situation or narrow modelling. For example, much has been made of benefits of employment and productivity because of the development of the airport. This has been narrowly considered with the assumption always being that it is the current Brisbane airport that is necessary to provide this employment and productivity. Consideration has not been given to the fact that an airport can be developed in a less intrusive place, particularly when BAC has proposed spending \$5 billion dollars on the current airport, this money could be spent elsewhere. Consideration has not been given to integrating freight transport with rail, road, and other airports, eg the airport near Toowoomba. Further, it has been suggested that the touted employment benefits of the airport itself are doubtful because of the automation of so many jobs and secondly the touted increase in productivity does not take account of the reduction in productivity as a result of the noise impact both on the current working population and also our future generation, our children.

The current regulatory structure is clearly inadequate. Industry self-regulation, assisted by regulation by captive governmental bodies (Airservices) or governmental regulation based on blindly accepted industry information, has not led to the best outcome for the Australian people. The oversight of the Department of Transport has been lacking in allowing the airport in Brisbane to develop in the way that it has. Airservices has become a captive organisation of BAC, and has not fulfilled its remit to protect the community. The ANO even with the power to determine the failures of BAC has no authority to compel any action. Organisations that have been set up to listen to the community and make recommendations have a strong industry input unsupportive of community concerns. The impression is that these latter organisations have no real power to effect any change. The Australian government has a responsibility which to date it has failed. A comprehensive review of the current regulatory setup needs to be made to support our much touted Australian way of life.

In addition to the above comments I support the detailed, knowledgeable and well researched submission of BFPCA.

Yours faithfully  
Beverley Fry

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