

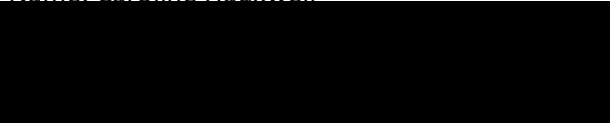
Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Madam/Sir

I herewith wish for the attached document to be accepted as a formal submission to the Aviation Green Paper 2023 consultation. I confirm that I would like my submission to be formally counted, made public and published on the Department's website.

My details are as follows:

Name: Caroline Hauxwell



Sincerely
Caroline Hauxwell

Submission on the Aviation Green Paper, 2023

Contact name: Caroline Hauxwell

6. [Airport development planning processes and consultation mechanisms](#)

6.1 [Noise](#)

I recognise the need and demand for expanded airport services to benefit all Australians. However, my experience of the expansion of Brisbane Airport over the last 3 years suggests that the balance between corporate profit and public welfare has been lost.

The airport corporations and airlines operate without the statutory oversight required to protect the rights of residents affected by the noise and pollution from the operation of these businesses. The lack of effective national noise standards for aviation exposes thousands of residents of Australia's major cities to persistent, harmful noise. The environmental impact planning around the Brisbane Airport

There is an established and increasing body of peer-reviewed research that demonstrates the significant harms of aircraft noise on human health and child development. Studies at such as Itzkowitz et al 2023 (listed in 'references' at the end of this submission) show that exposure to aircraft noise as low as 10dB in the evenings and mornings result in significant increases in cardiovascular events.

Brisbane residents are now experiencing night-time noise events of 40dB over ambient (as determined by ASA noise monitoring) at distances up to and above 30km from the runway end. Some previously rural areas of Brisbane such as Brookfield are now under seven main flight paths (both departing and arrival, dependent on wind direction) and a number of

minor flight paths from Brisbane Airport operations and additional flights from the expansion at Archerfield. Residents have seen an increase in flights from just over 500 in 2019 to just under 11,000 flights per year in 2022 (from ASA data). The number of flights and the 24/7 impacts of noise, with overlaying arrivals and departure routes ensuring that there is no respite from the noise is increasing as the Brisbane and Archerfield operations return to pre-covid levels and expand in line with the master plans of these two Brisbane airports.

This level of noise is proven to be extremely harmful to human health and child development, reduces the reasonable amenity and value of homes, and causes significant economic impacts on the economy. It is residents who bear the economic costs, through loss of health, costs of noise mitigation, loss of value of their homes, and costs of moving. These costs also severely affect the desirability of Australian cities as places to live, with significant cumulative impacts on local economies through costs of health loss of work hours.

By their own admission in Brisbane Airport Community Aviation Consultation Group meetings in 2023, either Brisbane Airport Corporation nor Air Services Australia have the technical capacity to determine the impacts of aircraft noise on human health and child development, despite the extensive documentation of these impacts in international research. ASA are spend many millions of dollars to investigate the possible impacts of polyfluoroalkyl substances (PFAS), but do not investigate the impacts of noise on human health and child development.

The Environmental Impact Statement for the Brisbane and Archerfield expansions did not and do not include these fundamental assessments of impact of noise on health and child development, nor on the costs to the economy of these impacts. There was not and are still no land use planning or building codes in place to protect residents in areas such as St Lucia, Brookfield or Pullenvale from impacts of the planned flight paths and expanded airport operations. The basic standards of from workplace health and safety legislation, including the requirements on businesses to prevent psychosocial damage, do not appear to protect residents from the harms inflicted on them by the operation of airline and airport businesses. There was not and is not any independent judicial review of these airport and airline planning and operations that would protect residents from these impacts. The 'over the bay' operations that Brisbane residents were promised have not eventuated, none of the ASA post implementation mitigation strategies have resulted in any demonstrable improvement in impacts on residents after 3 years of the new operations, and the conditions for residents continue to deteriorate.

As a result of these legislative and government oversight failures, airport and airline operations are having severe impacts on health, child development and local economies, costs that are primarily borne by residents.

Australians urgently need national legislation that limits aircraft noise over residential areas. This must be based on noise effective and extensive noise monitoring, and backed by prosecution and fines for breaches.

Airport infrastructure planning and flight path design must be subject to independent judicial and technical oversight that safeguards and advocates for communities and residents, and has the power to demand change to airport and flight path planning to safeguard human health (including mental health), child development, and the reasonable enjoyment of our homes and cities.

The Brisbane Airport expansion was imposed over vast areas of the city without adequate prior zoning or building guidelines. Building codes and land use planning that adequately inform and protect residents from the harmful impacts of airport and aircraft operations must be introduced and enforced. New flightpaths and airport operations (including drone deliveries) must not be imposed over residential areas of cities that have not been previously designated and constructed for this purpose.

Community consultation:

Air Services Australia no longer have the trust of communities, with documents obtained in senate estimates demonstrating that ASA protect the interests of the airlines and airport corporations over the wellbeing of communities.

In public consultations, ASA repeatedly put very limited and technically complex 'alternative' flight path proposals to communities without independent expert oversight with the technical and legal capacity to advocate for residents. These 'alternatives' serve to spread operations over a wider area, inflicting health and economic costs on a wider number of residents. Furthermore, the processes by which these 'alternatives' are designed, their impacts on residents, and the process by which particular 'alternatives' eventually implemented are selected, are not clear to participants.

The 'consultation' processes through which ASA engage with communities present flawed, unvalidated maximum noise contour models that mislead residents on the levels of noise they will experience. ASA's own data from their small number of noise monitors show the areas of maximum noise far exceed the contours maps provided. Furthermore, the ASA data is not available for independent review and analysis, as a result of which the full extent of noise impacts on communities is still not available to residents or their elected representatives in a transparent and intelligible process.

Communities are thus bamboozled, frustrated, and misled in regard to the impacts and options presented to them, and have lost trust in ASA. Australians urgently need an agency, independent of airline and airport corporation funding, with the power and technical capacity to advocate for community wellbeing and enforce safe operation of airport and airline businesses (including safe levels of noise in residential areas) for the benefit of all.

Integrated infrastructure planning.

The expansion on the sites of historic airports locations (such as Brisbane Airport and Archerfield) impose negative social and economic impacts on our expanding residential cities. The current processes of airport expansion and colocation of both freight and passenger operations such as proposed 'Airport Cities' and drone operations result in a

concentration of airport operations directly adjacent to residential areas. These expansions are not accompanied by the long term regional, national and local planning required to reduce the harmful impacts of these businesses on residents. This is to the detriment of residents and the economies of those cities.

Airport infrastructure and airline operations, proposed expansions, and introduction of drone operations, need to be integrated into national transport infrastructure and regional development planning to reduce the concentration of aircraft operations over residential cities. This integrated planning should include alternative domestic transport infrastructure such as high-speed rail and distributed regional airfreight hubs to distribute economic benefits and reduce the costs of the concentration of aircraft operating over residential areas.

Building codes and land use planning that adequately inform and protect residents from the harmful impacts of airport and aircraft operations must be established and enforced. New flightpaths and airport operations (including drone deliveries) must not be imposed over residential areas of cities that have not been previously designated and constructed for this purpose.

In conclusion:

Airport infrastructure needs to be re-regulated to establish a balance of benefits for residents and communities as well airport corporations and airlines, and to avoid the externalisation of the significant economic and social costs incurred through the harmful impacts of aircraft noise on human health, child development, noise mitigation, and the standard of living in Australian cities.

Airport development and flight path design must protect residents' rights to safe and reasonable enjoyment of their homes, and protect residents from harm from aircraft noise, including impacts on mental health and child development.

National noise regulation is urgently required, with standards that recognise and minimise the impacts of aircraft noise and pollution on human health and child development, in line with international published findings.

Airport infrastructure planning processes must include qualified independent technical and legal oversight that advocates for communities, with legal powers to impose restrictions on the harms caused airport and airline businesses to individuals and communities.

Environmental impact assessments for airports, flight paths and associated businesses (including drone operations) must include qualified assessment and mitigation of impacts of noise and operations on health (including mental health), child development, and reasonable enjoyment of residential areas.

Airlines should be subject to legislation consistent with current workplace health and safety legislation that ensures that they are responsible for the impacts of the operations of their businesses on residents and communities, including impacts on mental health, cost of mitigation, impacts on property prices, and for loss of reasonable enjoyment of homes.

Airports should be designed to maximise the quality of life in cities for the benefit of all residents, and the full costs of minimising impacts on communities must be included in planning processes. Airport planning and flightpaths, like highways and rail infrastructure, must be subject to provision of compensation for individuals and communities affected by noise, including noise mitigation, loss of reasonable enjoyment of homes, and costs of relocation. These costs must be included - fully and transparently - before any airport expansion or flightpath is approved.

Airport infrastructure and airline operations, proposed expansions, and introduction of drone operations, need to be integrated into national transport infrastructure and regional development planning to reduce the concentration of aircraft operations over residential cities. This integrated planning should include alternative domestic transport infrastructure such as high-speed rail and distributed regional airfreight hubs to distribute economic benefits and reduce the costs of the concentration of aircraft operating over residential areas.

Building codes and land use planning that adequately inform and protect residents from the harmful impacts of airport and aircraft operations must be established and enforced. New flightpaths and airport operations (including drone deliveries) must not be imposed over residential areas of cities that have not been previously designated and constructed for this purpose.

Community consultation and engagement processes must have the full trust of communities. The flawed ANEF standards and contour modelling currently presented to communities must be replaced by validated models based on extensive and accurate noise monitoring that is readily available for full independent scrutiny.

ASA must be replaced by an independent, transparent, regulated authority that functions to ensure that operations of airports and aircraft are safe for both residents as well as aircraft, airport and passengers.

Finally, there must be an immediate curfew and cap on flights over homes imposed at Brisbane airport until such time as over the water operations and flight paths that do not harm resident are introduced and enforced, and significant compensation for residents affected by noise can be established.

Australian cities can be both profitable, connected, and a desirable place to live. Airports, airlines, legislative frameworks and agencies charged with implementation and oversight agencies should be designed and operate to protect the wellbeing and maximise the benefits to all residents, as well as corporations and investors.

References

Itzkowitz, Nicole, et al. "Aircraft noise and cardiovascular morbidity and mortality near Heathrow Airport: a case-crossover study." *Environment International* (2023): 108016.

