

Submission
to
Aviation Green Paper > Towards 2050

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I comment as a concerned citizen, and am not involved with the aviation industry in any way. My interest is in the impacts — on surrounding environments and communities — of airports and flights.

Summary of Issues that I would like to comment on:

- (1) The impact on climate of a large increase in flight numbers and densities
- (2) The impact of noise on the health and wellbeing of communities
- (3) The issue of how aircraft noise is measured and communicated to the public
- (4) The impact of pollution on the health and wellbeing of communities and biodiversity
- (5) The impact of noise on the health and wellbeing of biodiversity and ecosystems
- (6) The need for the Aircraft Noise Ombudsman to be independent

I acknowledge the importance of the aviation industry to Australia, but seek future aviation policy and regulation that place the wider community on an equal footing with this industry, so that the community can expect to live with good health and freedom from the debilitating and ‘torturing’ effects of (a) the unwanted noise itself, and (b) any incessant, unescapable aspect of unwanted noise.

A large cultural change is needed, away from totally human-centric thinking, and towards ‘systems thinking’. Especially given the urgency of climate overheating, there is a need to explore different pathways for development of air travel — including the possibility of refutation of endless growth — other than the dominant ‘economy-at-all-costs’ framework proposed in the Green Paper.¹

We have a responsibility to future generations: not to live selfishly now.

Protecting our Climate

- (1) The impact on climate of a large increase in flight numbers and densities

The Green Paper states that aviation is ‘hard-to-abate’. It further states that demand will continue to grow, and that the new infrastructure and activity arising from the demand will be managed into place.

Polar and global glacial ice is melting so rapidly — far more rapidly than forecast. Our human societies have evolved during this time when our planet has/had polar and glacial ice as part of its global temperature-regulation systems. If only for the sake of human societies... it has become imperative to prevent further melting.

The consequence of further melting is dire. It is: a replacement of the albedo (degree of reflectivity) of ice (which has a high albedo, that we perceive as whiteness) for the albedo of seawater (a low reflectivity, heat-absorbing, surface that we perceive as darkish blue). The more the ice melts, the more the heat-absorbing surface is revealed, and the faster the remaining ice melts. This is a positive (meaning ‘reinforcing’) feedback loop.

¹ For example: “...if growth of the aviation sector is not to be constrained.” (p82)

Of course, aviation accounts for only one segment of society's carbon emissions. But in section 5.1², the 'global picture' description includes the comment "most forecasts expect strong long-term aviation demand growth". Given the urgency of the need to prevent further climate overheating, would it not be wiser to use education and to incentivise behaviour change towards a lessening of demand ...? — at least until carbon emissions can be reduced to near zero...?

Protecting our Communities

- (2) The impact of noise on the health and wellbeing of communities
- (3) The issue of how aircraft noise is measured and communicated to the public
- (4) The impact of pollution on the health and wellbeing of communities and biodiversity
- (5) The impact of noise on the health and wellbeing of biodiversity and ecosystems
- (6) The need for the Aircraft Noise Ombudsman to be independent

(2) The impact of noise on health and wellbeing of communities, and (3) The issue of how aircraft noise is measured and communicated to the public.

I note from the Green paper that "Community members, advocacy groups and the Aircraft Noise Ombudsman (ANO) consider the existing use of Australian Noise Exposure Forecast (ANEF) contours to portray the impacts of aircraft noise to be inadequate."³

While I do not have any knowledge of the working of the ANEF, I do have some understanding of the challenges of measuring road noise — which, of course, can be part of a cumulative noise burden (with aircraft noise and more) on many communities.

It is unacceptable, (if Australia is to be called a democracy), to baldly assert that "...a level of noise disturbance is unavoidable as activity grows to meet passenger demand"⁴ if/when this level of noise disturbance is unacceptably detrimental to (a) surrounding communities and to (b) the environment that supports all our economic activity.

The same paragraph continues: "Through the Aviation White Paper, the Australian Government will consider what additional options are needed to improve airport development planning processes and consultation mechanisms."⁵ Currently, in areas such as Brisbane, the level and frequency of noise disturbance has become untenable — and incompatible with healthy living.

² Page 75

³ Section 6.1, Noise, p 95

⁴ Section 06, p 94

⁵ Page 94

In the Stakeholder Feedback⁶ the ANO is stated to have observed that complainants “often express **confusion** when trying to find out who is responsible for regulating aircraft noise and **anger** at what appears to be a general lack of regulation” (my emphasis in bold).

As society becomes increasingly complex — with rapidly evolving new technologies and more and more people all living through a worsening climate emergency — there are more and more ‘issues’ that everyday people are suddenly required to spend much of their time ‘dealing with’. Many of these may occur within a context of ‘solastalgia’ (which is defined as a form of emotional or existential distress caused by negative environmental change⁷; the feeling of shock and loss on seeing a beloved and comforting ‘home’ environment change out of all recognition). And it is inequitable that the fewer people who are frequent flyers are flying at the cost of distress to the larger number of people who seldom fly: this clash of ‘demands’ should be managed for the opportunity of healthy living for all.

Perhaps it is thus no wonder that there is increasing incidence of mental ill-health, and especially in young people. This issue of the impact of a (perhaps unceasing) noise burden (with no prospect of relief) is an extremely serious one — it is, in fact, cruel. There is much documentation of the application of enforced noise as torture. Noise should not be taken lightly. Its eradication, to a large extent, should be a priority issue for aviation towards 2050.

Thus it is imperative that, for all future aviation policy making and planning in Australia, there are rigorous standards and techniques developed, applied, and enforced, for accurate recording of acute and chronic aircraft noise. This information must be easily publicly available. This is not a frivolous or marginal issue. Noise is known to cause major health impacts, which have a knock-on effect — economic, logistical, infrastructural — on overburdened hospitals, health services and society.

This paragraph finishes with: “The Australian Government is not considering imposing any additional constraints on airports such as curfews or movement caps.” This seems to indicate a fully dominant ‘economic framework’ within which air travel is being expanded, to the detriment of so many people. This cannot be for the long-term good of Australia’s society. Curfews or movement caps, as tools to alleviate a noise burden, should be used for the co-existence of airports and local (and not so local, but heavily impacted) communities.

(4) The impact of pollution on the health and wellbeing of communities and biodiversity

It is not clear to me how much is known about the extent of possible pollutants from overflying aircraft, e.g. whether (or not) living underneath a flight path results in particulate matter gathering in water tanks in semi-rural areas (where people are taking responsibility for their own water supply needs, etc...) I have heard people expressing their concerns about these questions.

⁶ P 95

⁷ Wikipedia ‘Solastalgia’

(5) The impact of noise on the health and wellbeing of biodiversity and ecosystems

Australia is experiencing a biodiversity extinction crisis. So many species communicate using sound, or can be disturbed by noise. Studies have shown that some species are changing their vocalisations to fit in with noisy human environments. Do we understand any consequences of this? Whenever aviation policy-makers attempt to reduce aircraft noise to human communities by sending flights over certain 'green' areas seen as being somewhat remote, they are likely to be adding to the noise burden on animals — both diurnal and nocturnal. We should care about the intrinsic rights of other species with whom we share the planet. We may also discover, at some point, reasons why placing yet more stressors on animals may not be in the interest of humans...

In addition, semi-remote 'green areas' (over which flights might be sent) are often the recreational areas where stressed city dwellers go to find some peace. There needs to be much consideration given to fairly allocating locations and times for quiet to all communities — human and 'natural'.

(6) The need for the Aircraft Noise Ombudsman to be Independent

I believe it is vitally important to have a fully independent Aircraft Noise Ombudsman, to give the public confidence that noise complaints will be fairly dealt with.

As a final point:

Drones

A good question on page 110 is: How can new and different types of noise impacts from projected growth in drone use best be managed?

My further question is: How can privacy be safeguarded? How can people be spared the intrusive noise and the breach of the right to some privacy that drones may bring?