

To: Committee Secretary,
Senate Rural and Regional Affairs and Transport Committee,
Department of the Senate.

PO Box 6100,
Parliament House,
Canberra ACT 2600,
Australia.

From: H. Jenssen & other residents
C/o: 16 Galway Cr.
Salisbury Downs,
South Australia, 5108.

14 March 2007

Dear Senate Airports Act Inquiry Committee,

Please accept our apology for a late submission, but we were urged to submit our concerns for your consideration in relation to amending the Airports Act 1996.

Although apolitical, the failure of self regulation has become very evident for most ordinary people dealing with the 'Corporatisation' of once well organised bodies ensuring minimum standards of public service. Now we seem to need an Ombudsman for almost everything that has been privatised. Please keep residential addresses reasonably confidential. Retaliatory buzzes from Parafield flyers have occurred in the past. It's happened too often for chance.

This letter is about public health being ruined by leased airport operators deceiving 'approving regulators' about their true adverse health impacts, and the true unimportance of their non-transport operations. Polluting enterprises that are not essential, sustainable, and unnecessary to operate where they do, yet are authorized by ignorant, or uninformed governments. In particular, this letter is about 'Federally sanctioned', if not encouraged, and 'State endorsed' public health problems caused by flying Schools operating in the midst of residential areas, in particular Parafield Airport. This may be significant enough to warrant a separate Senate inquiry.

In the 1980's the then, Parafield Aerodrome, was once an unobtrusive neighbour until the Federal Airport Commission (FAC) and Parafield airport management decided to grow a massive flying school there, disregarding any consideration to tens of thousands already established civilian family households. Airport arrogance is evident between airport correspondences between residents and Salisbury Council. Not a lot has changed, except FAC wrapping up while changing airport ownership structures after flogging Airports off for Canberra. I notice ex FAC staff

amongst current Airport management. That may be expected, and natural, but needs to be kept in mind if trying to understand how contemporary airport problems evolved. The arrogance is still there, but it is harder finding it written. One can still readily experience the insensitivity. The airport industry's 1800802584 'Airservices inquiry line' is the public point of contact for airport complaints. With all operators usually being busy, angry complainants must endure a most inappropriate recorded self promoting Airservices jingoistic advertisement. Objections to that recording message have been lodged for over 12 months. Airservices knows it aggravates complainants, yet refuse to remove their inappropriate recording, because those responsible having it there, quote, "love it". The pollution and environmental degradation continues – growing business as usual with a glossy touch.

Do not be misled by airports claiming little aircraft making little noise as claimed in Moorabbin's airport submission – their noise can be worse than exhaust braking trucks running over your roof, up to several times per minute, hours on end almost every day. Often one can feel the vibration in the floorboards, while the aircraft drone rattles windows. Outdoor amenity and privacy is also lost.

The 'light regulation' policy of leased airports is a public health disaster here in Salisbury Downs. Self regulation does not work when greed is rampant. I have never experienced such an arrogant mob of managers permitted to intrusively disturb many thousands of innocent domestic lives outside what happens to civilians caught within a war zone. Our authorities pretend there is no problem to be concerned about, hardly surprising since most 'official' airport environmental information originates from polluting perpetrators' management.

Hopefully you can ensure the amended Airport bill respects civilian health, amenity and ensures airports being fully accountable also for their 'off field' operations. Better still, maybe you can ban all flight operations over urban areas that can, and should be done elsewhere.

Our experiences

Throughout the past decade adverse environmental and health representations have been made to all tiers of Government with little resolve, in fact our environment continues to worsen as Parafield Airport managers push for their preposterous goal of a half million air movements per annum. This is a miserable situation for Citizens having invested much of their lives building, establishing, living, 'retiring', many now dying, in a once desirable suburb they created from dust, without compensation so that arrogant others can profit. It is another disgusting example of strategic planning delivered from one of the world's best funded, expensive systems of governance. Petitions have been submitted, the only result seems to have 'confidentially' concentrated night flying noise from one residential area to another residential area. Possibly one suburban area was sold out, being demographically less literate and less

connected with our system, populated with more people from non-English speaking backgrounds. Thousands of complaints are still effectively ignored. Sadly many people have had to move out of their family homes, leaving the problem for somebody else to deal with.

How this happens, is why I am attempting to collate many shared experiences, detailing what I can in this letter.

Lawmaking Consultation & Participation

I was dismayed not to find any references about urban area flying school operations in discussions raised at the Inquiry of the Airports Amendment Bill 2006. I was also dismayed that in the manner the general public was poorly informed that a Senate Committee of Inquiry was inviting submissions pertaining to the 1994 Airport Act, while offering minimal time to prepare submissions for important airport issues. Such rare opportunities, for hundreds of thousands of people affected by airports in our country to have a reasonable hearing by our lawmakers, without threats of being sued, warrants better public opportunity to contribute. For Salisbury residents it was the only such opportunity since the flying school problem manifested over a decade ago, and that opportunity was notified in a national paper, unfortunately not a medium that typical Parafield afflicted Salisbury residents normally would subscribe to. Adelaide has now only one paper, *The Advertiser*, which is periodically influenced by Adelaide airports to promote the fun of flying, disregarding the adverse affect imposed upon those they fly over. They do not disclose pro-airport articles as 'advertorials' and ignore complaints about them. The timing of the Senate Airport Act enquiry submissions coincided with Christmass holidays, a time most ordinary people dedicate for work respite or family interaction. Such scheduling strongly favours professional organisations like the Australian Airports Association, and its members, developing submissions. Thousands of individuals whose home lives are being destroyed by impacts of non-essential airport operations, and other airport 'developments' were effectively kept out formally contributing to your process. Furthermore, the inquiry seems to be focussed toward airport land being used for non aero commercial developments, a fiasco in itself for decent overall local planning, but distracts the obvious – degradation of environment due to reckless growth of unnecessary aero and other operations damaging the health of hundreds, if not thousands of innocent citizens. On the commercialisation of airport lands, I hope you properly investigated AAL & PAL's 'full time equivalent' job claims, and factored in the displaced jobs caused by their commercial 'developments'.

A reference CD sampling published letters and other material that is self explanatory is added with this letter. I expected our Salisbury local representatives and State environmental representatives to be aware of this, but I fail to see much of it identified in any submissions. I'll try to outline the disgusting situation below.

Airport Planning & *their* idea of Consultation

Salisbury Council, Parafield's local community's representation, has expressed its concerns about grossly excess aircraft noise pollution degrading residential environment since the FAC became involved, all without resolve. Not much has changed, aggressively maximising airport capacity and airport 'value' seems only what matters to airport management.

Airport Master Plan Consultation processes with residents are minimal, single sided and extremely biased in favour of the Airport's financial interests. They include airport 'PR' broadcasts and self promoting airport articles in print. The airport considers 'consultation' to mean announcing what they wish to do, offer interested parties a contact to have a say, but whatever that may be, the airport will do what it wants anyway. No doubt you would have experienced that arrogance with submissions concerning their commercial proposals.

At Parafield they did not make clear that thousands of aircraft flown by novices will fly over peoples' homes daily. They do not say that, let alone whose homes will be exposed to *continuous* fluctuating 60-85 decibels of droning noise exceeding 50 hours per week. There currently is no resident's representative on their consultative committee, and even when there was, their concerns raised were effectively ignored. The same happens with letters to Airport Management. That is why the last 'resident's representative' resigned a few years ago. Parafield Airport won't highlight that a crash on a home per year is sanctioned, (estimated from off-airfield crash probability quoted in Parafield Airport's Master Plan). They attempt to veil the fact that the bulk of air movements are purely for foreign commercial interests, abusing concessions set aside for essential transport services for our State. The foreign flying school at Parafield, with questionable net contribution to our economy, has the same adverse environmental impact concessions as Mascot or Tullamarine. Flying school operations are unnecessary, and it is irresponsible to allow them over residential areas where they should be prohibited.

Airport Operations & Complaint Management

The Airport and Airservices control complaints and most information threatening Airport profitability. At Parafield they estimate the actual air movements as conservatively as they can. They actively attempt to downplay the significance of complaints by excuses like: a 'low cloud' day, a 'stage of training' the cadets are at, cross winds, restricted airspace etc. In the past when complaints were managed at Adelaide airport, most complaints were not even registered. They downplay complaints made by the same complainants, claiming the complaint registration process is abused. This is not so, the main flying school generally fly *exactly* over the same houses, averaging 300 up to 1500 hundreds of times per day! Multiple complaints are what is to be expected. The truth is, for every

persistent complainant there may be hundreds similarly aggrieved people that long have given up complaining, because nothing improves.

Residents' desperate concerns are fobbed off by the Airport management using systematic 'isolation and demoralisation' techniques. Typical 'consultative' responses from the arrogant Aviation fraternity to concerned residents affected by flying school pollution include:

"Airport was here first" - that may be so, miles away from anybody in ~1927, a grassy knoll allocated mostly for the adventurous rich. In a way, it still is mostly for the affluent that do not live under their noise. Nevertheless, since the 1950's, adjacent Residential suburbs existed – that is over 40 years before mass flying school operations commenced. Now air movements over areas West of Parafield have tripled over the past 5 years typically to 300-1000 overpasses most days. Influence from the Mawson Lakes area, the final development that now completely surrounds Parafield Airport with residential homes, encourage more air movements over older established areas – weather permitting of course. To some extent the noise dose moves from new housing areas inhabited by more affluent influential complainants, to older lower cost housing areas where complainants are less tenacious and easier to ignore.

"Get over it" – A typical attitude accepted within militaristic aviation circles, but no sound proofing, or compensation of the loss of amenity is offered.

"Move house" – again, but no compensation for costs, disruption, effort to move and relative property devaluation is available. Many houses stay unsold due to the noise problem.

The Airport's responses often include comment to the effect that the 'international school is so successful, they are here to stay'. Furthermore they try to make complainants feel they are powerless, alone, or bully them as a minority of whingers. These sentiments are also conveyed by the sole 'public contact' for airport complaints, Airservices Australia / AERU.

Airport Noise Declarations

These are the rubbery modelled noise concept contours abbreviated as ANEI, (noise index) or the 'ANEF' which often submitted as a 20 year 'forecast' in rolling Airport Master Plans. The ANEF does not reflect the current horrendous noise growth situation and exposure inside flight turning arcs and intersecting flight paths, of which many exist kilometres all around the Parafield Airport. Policy or objective systems verifying postulated noise contours around Parafield, are lacking or non existent. The ANEF system produced by aviation interests, is not based on objective noise power, but peoples' perception, so that even around 20ANEF contour 50% of people will be 'moderately' affected, 12% will be seriously affected, meaning they will have to move or go mad. Airport

Master plans do not make this clear. ANEF contours do not quantify actual noise exposure.

Repetitive droning noise from 'light' aircraft is more irritating and disturbing, but is not reflected in the ANEI/F modelling. Even the Environmental Director from DOTARS concedes that a Jandakot study revealed that annoyance of flight training operations under the calculated at 15ANEF contour was equivalent to the annoyance under flight paths of major airports at the 20ANEF contour. The sheer volume and spread of flying school air movements, adversely affects a wider area than that of occasional jet aircraft traversing a straight path.

The General Manager, of the problem flying school, Keith Morgan, claims the school is very conscious of being a good neighbour, and is continually evaluating ways to reduce activity of the Parafield circuit. Cheap talk towards our DOTARS Environmental Director. At a 2006 Parafield Airport Consultative Committee meeting Morgan was witnessed aggressively claiming it was his job to grow, promote and secure 'his' business as much as he can, consistently ignoring resident's complaints, while building more cadet accommodation at Parafield.

Requests to the Airport management about exactly how or what data and parameters are used to model their ANEF/I/C noise contours for Parafield are ignored. This information is needed to compare what is observed. I suspect at Parafield they are not considering the actual volume of flying school operations, or not properly considering the accelerating, (i.e. climbing/powered), aspects of the flying circuits. The cadets climb using full power. The extra noise exposure with respect to increased power adds over 30 decibels, to what noise one experiences during a normal cruising overpass - even at 1000 feet. Repetitive flight paths can also be 'modelled' to widths sufficient to dilute the noise exposure model output plots to indicate all is within 'acceptable' limits. The current ANEF modelling process can be manipulated to produce whatever is desired by the aviation industry.

As stated, they consistently fly over the same homes, cynically adhering to their airport policy encouraging a, 'noise tolerant neighbourhood'. This causes the same people to complain, and eventually move or give up while struggling with mental health problems. 'Giving up' reduces ongoing complaints, while moving house delays the onset of new complainants.

Current Airport Noise Monitoring

Flying school movements and noise measurements produced by the Airport are fudged.

While DOTARS relishes in 'world best practice' endeavours, they are unaware of any continuous noise monitoring systems in place around the world's flying schools. Perhaps we are the only place stupid enough to allow such a flight training facility in the middle of a civilian population.

It has taken many years to get a longer term (6 month) airport noise measurement programme to happen. Unfortunately, the current noise assessment is not undertaken by an independent process. The noise is measured for the airport by Airservices Australia, as a service for the airport. They know they are trying to measure something that wants, and can, avoid being measured. The flying school business can move, or reduce operations while noise measurements are done. This has occurred in the past, made possible by the then Department Of Transport (DOT) declaring when they were measuring at Parafield. Apparently, in that short 1993 measuring period, there were hardly any aircraft flying around for them to measure. Parafield airport still got the air movements in after DOT had returned to Canberra. I do not believe any departmental noise measurements under circuit flight paths off the airfield have been done since. Due to the amount of operations committed to be scheduled these days, there are other ways to 'legally' minimise the reported noise measurements. I'll try to explain:

Please refer to the attached map. It was produced by the Residents Against Air Noise, (RAAN), about a decade ago. You will not find this detail in any airport 'consultation'. The black Basic Circuit path shown on the attached map is still a valid representation where they concentrate flying school operations today. The main difference today is that Parafield airport no longer has large areas of stockyard land south, where operations can be done affecting less housing. That land is now mostly developed as residential. The noise under the shorter rectangular ends of either circuit path gets unbearable. This is where aeroplanes accelerate and turn for thousands of hours per year.

The current chosen monitoring site is in a sensitive area, (a primary school), but more importantly, it is in an area where aircraft coast, and rarely accelerate. The noise monitoring station is located in the middle of the longer western side Basic Circuit 'coasting' path. Being in the middle, the planes will always be coasting there, irrespective which direction they fly the circuit. Their actual flight paths also fan out more in this region, paralleling the straight coasting runs. The noise measured here can create an illusion, under-representing what the actual noise is under the flying circuit's longitudinal ends, where parallel paths converge, and aircraft accelerate. The Airport's environmental consultant and Airservices are aware of this, but it is part of the 'art' of managing perception of those not living under their pollution.

The current noise measurements are not correlating noise from circuit training movements, the very movements which almost all the complaints are about! Because they are not correlated, they will not be in their report. Aircraft need to have radar triggered identity transponders turned on to enable correlation with a measured noise event. Transponders are fitted to training aircraft but are deliberately turned off, apparently at CASA or Air Traffic Control's request. They argue safety issues concerning superfluous data cluttering their Adelaide radar displays with flying school

circuit operations. To me that is another example of the air fraternity helping each other. Surplus display data can be electronically masked from contemporary Air Traffic Control radar displays, while retaining a mark that something is out there. That would be the safest option, because then the mark can electronically be interrogated, as the training aircraft's transponder is on. It would also enhance our security.

Without measuring all aircraft movements they begin to mitigate operational air noise claiming the high amount of noise measured as 'background, or from other sources like exhaust braking trucks and trains.

Even after all that, the aeroplane correlated noise dose measured is then averaged, (i.e. diluted), over as many hours as it is plausible to maintain some sense of credibility.

They should be reporting hourly noise doses, of all aero movements. That data should be captured, please ask for it, keeping in mind what actually is recorded.

The current report is available from the Airservices website. See for yourselves and notice that they at best correlate less than 9% of Parafield's actual air movements. Parafield Airport runs 20-30 thousand movements per month. The current +20 thousand movements quoted by Airservices apparently do not include movements outside tower hours (i.e. outside 8AM to 6PM). Please demand that all flying school operations are tracked – today's technology makes it simple to log.

I share with many that it is not a laughing matter, when one is sickened for days after being exposed to their noise. It takes me days to recover, and one is constantly on edge, anxiously wondering when the nauseating racket starts all over again. It is disturbing, disgusting, and genuinely unnecessary. Don't be conned by the Morgan's moving stories – past experience suggest they have no intention leaving Parafield.

Please recommend an independent body, preferably reporting to a public health department to undertake this sort of work. It is not that complex.

Environmental Authorities – S.A. State EPA

Our EPA does nothing about measuring industrial flying school noise. Objective truthful measurement of the above environmental situation is systematically kept out not only Federal, but State Ministerial documentation. Our Premier's office does not even acknowledge a problem. It has been going on for years, adversely affecting residents' health and their children's development. That damage is also not measured. I recently learnt an estimate that a community loses ~\$10,000 per I.Q. point lost, per child. A couple of years ago I noticed Salisbury High School celebrating the fact 8 students matriculated! Our State spends millions on Consultants, covering up what is obvious, sacrificing citizens' health to help inconsiderate foreign investors.

Conclusion?

Noise pollution should be measured as noise dose, e.i. noise exposure over time where any noisy industry operates. It is that simple. The international flying school at Parafield is a noisy industry that undermines the intent of Federal Acts, while shielding itself from local environmental obligations. Urban noise exposure limits are clearly set by the World Health Organisation, which Australia subscribes to. The noise contours Parafield airport submits are a 'legally' prepared misrepresentation, assisted by of our own DOT Airport Master Planning section. While questioning these organisations I even detect a sense of pride, like a coup, boasting it is all 'legal', while ensuring inconsiderate industrial flying operations continue destroying whole residential neighbourhoods. These flying school operations can, and should be done elsewhere.

The airports ANEF process is inadequate for urban areas, and is manipulated favouring the aviation industry. The ANEF is a system based on human perception, developed at a time when a cross section of surveyed people were more tolerant to noise, an era generally far less conscious about noisy workplace hearing damage and hearing protection. Urban background noise and human stress levels have since increased markedly, reducing the general tolerance for noise, but throughout the decades the ANEF process has not been revised to take that in consideration. Of course the Airports and their Associations want to maintain and control ANEF process. You have the power to remedy that by placing airport environmental assessment, monitoring and enforcement with empowered responsible independent bodies.

The 1990 House of Representatives Select Committee Response to Aircraft Operations and the Australian Community recommends night flight training over urban areas not to exceed 10PM. This is ignored at Parafield, otherwise they cannot maintain their absurd airport capacity.

We live outside the claimed 20ANEF contour, and the air training noise is unbearable. At least the 10-15ANEF contours should be included Airport Master Plans, with verifiable definitions of their true community impact.

The Salisbury Highway is a similar example of ludicrous State-Federal-Local planning. The noise and exhaust pollution along the Salisbury Highway, renders it unhealthy to live on. The Salisbury Highway was not to be directly connected to the Port Adelaide at the time 'the highway' was surveyed for housing. Now it is, with freight doubling every few years. The freight route was intended to bypass Salisbury using the then relatively uninhabited roads. What has this to do with Parafield Airport? Well, the homes were there first, and now zones of private residential and public housing along the Salisbury 'Freightway' exist where road noise is compounded with noise from flying school flight paths! No chance of compensation there, the blame game will cycle within transport Departments forever. It is frustrating enough just communicating about airport issues. Even after years of complaints, I believe nobody officially

is measuring this horrendous environment people have to live in. Current Authorities do little but handball their public responsibilities and obligations around, comforted by a legal system that most afflicted residents cannot afford to use.

Looking Forward?

These problems have been allowed, if not encouraged to grow for many years. Please ban flying school operations over residential areas. Please demand mandatory independent ongoing noise monitoring for airfields as busy as Parafield - that need not be an expensive exercise these days.

Flight training is not essential over urban areas, and policy allowing what is going on around Parafield is idiotic. It is ludicrous, and to me proves of how inconsiderate and irresponsible self regulation has become, in cases like this. Parafield Airport's socio-economic studies are not independent and do not contain comprehensive objective, adverse public health or property value assessments.

If the status quo remains, it is absolute proof for me that we 'living' kilometres around Parafield have no rights to minimum public health standards and no right to reasonable domestic amenity when it comes to organised multinational profiteers. They are permitted to 'legally corrupt,' (even with the Departmental help), essential information flows required for proper decision making, while avoiding responsibility for the serious adverse consequences imposed on thousands of unsuspecting households.

You have the power to remedy the legacy the FAC left behind.

Parafield Airport is now virtually enclosed by residential areas. It is in the centre of an area surrounded by a quarter of a million people - that is a city in its own right. The flying school can move elsewhere and grow there, benefiting more suitable places, like Woomera. Then it would truly be a net asset to the State. It would reduce Federal Defence overheads at Woomera, and the town has more suitable accommodation. In reality, Parafield's foreign flying school's opposition seems more likely to be merely based on city lifestyle for their temporary cadets, staff, and marketing appeal, at the expense of surrounding permanent residents' lifestyle, who settled there first. What is wrong with a desert experience? It was good enough for our Service families. At the very least Parafield can schedule their flight training operations out in suitable areas like that. BAE Systems, who ran Parafield's international flying school a couple of years ago, also manage Woomera's facilities.

When arguing the indisputable, it seems to me there may be a deliberate process in place, to keep the rot going on long enough, weaselling on until historical records lose relevance, while disinheriting us of our rightful amenity, without compensation. The intent is to churn the debate all over again, screwing up the next generation settling around Parafield. Eventually when living memory wanes, they will convince the world mass

flight training always occurred at Parafield, and people should not have built there. If that is so, then those involved perpetuating such a disgusting strategy are plainly arrogant and despicable, methodically ruining hundreds of millions of dollars of quality private and public housing stock.

Parafield Airport does not offer essential unique services claimed while they established their industrial scale flying school. Airport management claim a whopping 0.3% net contribution to the State GDP. Parafield Airport's contribution to the State is, and always will be negative if their overall net operational impacts are objectively measured, i.e. including the degradation of ~33 square kilometres of: community environment, land value, mental health with its secondary consequences, crime, damaged children... etc. Make the flying schools compensate for this, and then observe how fast they can move. Most of Parafield Airport's income is from commercial rents anyway.

People are suffering. Please do something. Move airport operations, close the airport, or at the very least compel industrial flying operations' pollution to comply with respectable international health standards, constantly monitored by a suitable independent human health department.

Thank you for your consideration,

It is hoped that our experiences are helpful to you assessing, non-essential airport enterprises; self regulation; corporate greed, misinformation, unconscionable conduct; and most importantly, help legislating the protection of innocent people's health over profit – and that should be a public duty, independent of any civil political persuasion.

Yours Sincerely,

Complied by: Harold Jenssen, stopparafieldairnoise@yahoo.com.au

Contributions also on behalf of:

S. Bordujenko, Fam. Davies, Fam. Oade, Salisbury Council, stopparafieldairnoise@hotmail.com subscribers, RAAN, ANAP, and many other Residents who care for public health & our environment.