



Recognising and upholding excellence in local government

Mail: PO Box 105  
Coolum Beach QLD 4573  
Mobile: 0417 577 881  
Email: [mail@oscar.org.au](mailto:mail@oscar.org.au)

28 April 2019

Jason Harfield  
Chief Executive Officer  
Airservices Australia  
Alan Woods Building  
25 Constitution Avenue  
Canberra ACT 2600

Email: [jason.harfield@airservicesaustralia.com](mailto:jason.harfield@airservicesaustralia.com)

Dear Sir

**Subject: Sunshine Coast Airport Airspace Changes Runway 13/31**

OSCAR is the peak body representing around 40 resident and community organisations on the Sunshine Coast; our membership covers both the Noosa and Sunshine Coast Regional Council (SCRC) Local Government Areas (LGA). Our main objective is to ensure that in matters impacting on the Sunshine Coast that there is *“Transparent and accountable governance, including community consultation that is respected and acted upon”*.

I am writing to you to express our concern over the current consultation process occurring in relation to this matter and to request an extension of the submission period to 31 May 2019. We believe this extension is justified for the following reasons:

***Inadequate time frame for submissions***

The consultation period was inadequate given the complexity of the issue, the volume of material to be considered, and the fact that Easter and ANZAC Day occurred during this period. The additional fact that submissions could only be made online using a fairly limited Feedback Form or via post (further reducing the practical time frame for responses) is not indicative of good community engagement. The absence of an email address for lodging submissions seems at best a strange limitation on the community's capacity to respond by the due date.

**Note:** The ASA website does not appear to show any email address for correspondence such as this with the agency; it is for this reason I have addressed this to you as CEO.

I would also like to point out that we have submitted our views via the online Feedback Form but we needed to split our submission into two parts given the character limitation of the Your Feedback field on the online form – despite a lack of any indication of this fact on the form.

***Lack of notification of the process for community consultation to all residents in the affected areas***

The Terms of Reference (TOR) and the 2014 Environmental Impact statement (EIS) state the following:

*Community Consultation should be Consistent with national and international good practice, and with regard to local and regional strategies for community engagement, the proponent should engage at the earliest practical stage with likely affected parties to discuss and explain the project, and to identify and respond to issues and concerns regarding social impacts. (TOR 6.1.2)*

*Communities of interest will be engaged in a meaningful way during the development of the Social Impact Statement (SIA), recognising local knowledge, experience, customs and values (EIS Chapter D5 5.2)*

*Combining these factors with the requirements of the Environmental Impact Statement (EIS) TOR, this airspace SIA focuses on identifying potential impacts of the proposal associated with people's way of life, their environment, their community, their health and wellbeing and their personal and property rights. (EIS Chapter D5 5.2.1)*

*The study area defined for the SIA as described in the EIS is the area within a 40 km radius of the airport – known as the project study area. This includes a focus of potential impacts related to the operation of aircraft in the air within the 40 km radius of Sunshine Coast Airport (SCA) (EIS Chapter D5 5.2.3)*

Not all residents in the affected areas were notified in a formal document posted to each address as proof of delivery on time and in full. Surveys show that many residents were not aware of the key issues and the short period for gathering meaningful information by the 30 April 2019.

Letterbox drops are normally considered to be junk as opposed to a formal letter commonly used by Government owned enterprises. A meeting at the hinterland hall at Tinbeerwah on Tuesday 23 April had approximately 250 people in attendance. When asked for a show of hands as to who had received a letter notifying them of the Community Consultation sessions in 2014 only two people raised their hands.

When asked the same question about the current sessions not one person raised their hand. These are people who would be impacted by the proposed flight path routes. Coastal residents are reporting that no one recalls receiving a letter from ASA to notifying them of their intention to map proposed flight path routes over their homes. A small number of residents have received a recent letter informing householders of the community consultation sessions and information “kiosks” in the area, however not every house has received one and these have been scattered across different suburbs and those that have received these letters have found them in their letterbox on the day of, or the day before, their nearest consultation session. It should be noted that several sessions had already been held prior to those few residents receiving letters.

#### ***Poor response to public enquiries***

The Information meetings held with ASA, SCRC and Sunshine Coast Airport staff on a one on one basis in a “kiosk” environment failed. This process failed because of the ratio of attendees to consultants was grossly out of proportion. Attendees felt that questions were not fully answered in a meaningful manner to assist them with their decision making. A response heard frequently to questions about flight path routes and noise impacts was ‘It’s in all the EIS’.

The EIS is a document of nearly 3000 pages. Telling residents to go back and have a look through the EIS to find answers to their questions or to verify what they were being told seems an inadequate response from both Council and ASA representatives. This is supported by media coverage of the outrage after each meeting. In some cases, the consultant turned their back on the attendee and walked away. This poor process for gaining quality information has totally failed.

#### ***Lack of effectiveness of community consultation based on media and consultative public meetings***

The effectiveness of providing meaningful information and the documentation of alternatives for public consideration has been incomplete. This is supported by the following:

- Lack of detail of potential noise impacts on individual affected areas.
- Insufficient evidence that the changes to the flight path have been stress tested against environmental and social criteria.
- Lack of evidence that the impact of the changes to flight paths have been stress tested against the EIS 2014
- Lack of clarity of the impacts that may occur if thresholds are exceeded and consequences that may follow.
- Non-disclosure of a list of assumptions behind the flight path modelling and the basis for assumption considered.
- Lack of clarity supporting that the changes to the EIS of 2014 are not significant and the basis for categorising them as minor issues.
- Lack of information supported by timelines, transparency, relevance, converted into a simple user-friendly format.

### ***Failure of 2012-2014 consultations to adequately inform the public***

The significant number of people attending the current community consultations, the level of engagement in social media, and the high level of media attention is testament that the original community consultation period 2012-2014 failed to meet the objectives of educating and informing residents and stakeholders about relevant technical aspects of the project and the likely impacts, especially the proposed flight paths.

This was compounded by the lack of direct communication by ASA and councils to inform potentially impacted residents of the opportunity for community engagement, consultation feedback. Print media advertisements (text only, no visuals) were carried in 4 local newspapers readily accessible to residents of the northern Sunshine Coast (*Noosa News, Noosa Today, Sunshine Coast Hinterland Times* and *Sunshine Coast Daily*) These notices were placed only once in early October 2014. In contrast, 7 advertisements/notices were placed in local newspapers in the environs of the airport and south where residents would no longer be as affected by aircraft movements. (Amended EIS (AEIS) 2.2.7).

### ***No Community Update Since 2014***

Stakeholder Management Plan – Stakeholder engagement during project construction through to operation was not conducted as per this plan. There has been no community engagement or update regarding the proposed flight paths for 5 years. (EIS, Appendix, E3-545, 3.3.2 Appendix 1)

In the 2014 community consultations, stakeholders were categorised and the consultation tailored accordingly.

Residents affected by proposed flight paths should have been classified as Level 1: 'People and organisations that have an active interest in the Project or are potentially directly impacted physically, socially or financially'. However, they were classified as Level 2.

Residents in a 15-20 km and 20-30 km radius were categorised as Level 2: 'People and organisations that have an active interest in a specific aspect of the Project'.

In November 2012 a community newsletter was only distributed to those residents located within 10 km of the airport.

### ***Access to clear and relevant information***

*The public must be able to easily access single event decibel dB(A) levels for all aircraft types on all flight paths, including an assessment of the impact of variations in flight paths on maximum dB(A). (TOR 3.6)*

Over 120 maps showing noise contour information of both existing aircraft movements and projected aircraft movements are contained within the EIS. The scale of these maps vary (eg EIS Chapter D3 Fig 3.5x and Fig. 3.5v) and in some cases no scale is shown at all (Chapter D2 Fig. 2.10a). Airspace maps showing existing and new airspace are of different scales, and no scale is shown (EIS Chapter D2 2.10a and 2.10b). The variance in how information is presented is confusing and inhibited residents ability to fully comprehend the information and understand how it will affect them.

The EIS also states that:

*The typical operation of a 737-700 has been examined in detail for both arrival and departure operations. The difference in noise levels from these operations would be typical of other aircraft on similar typical approach and departure tracks. (EIS Chapter D3 3.5.2)*

Exploration of maps showing noise contours of the B737-800 and the A320 would indicate that noise contour for different types of aircraft both arriving and departing is not 'typical' or the same as noise contour for the 737-700. The reality is that these noise contours vary considerably with impacts being substantially greater, the larger the aircraft. Information that has been presented to residents has been based on a minimum scenario and does not fully address or inform them of maximum potential impacts. (EIS Chapter D3 Fig. 3.5h, 3.5i and 3.5p)

Responses to submissions were given to residents by the proponent after the 2014 EIS, which perhaps left residents believing that impacts would not be particularly relevant to their area:

- Verrierdale not typically overflown
- Noise events at Verrierdale 60-65dBA
- No N70 events predicted for Verrierdale

- Weyba Downs not typically overflown
- Noise events 'potentially heard' as less than 60dBA in the vicinity of Weyba Downs
- Noise events at Marcus Beach expected to be 50-55dBA

(AEIS Table 2.3a No. 172, 174, 178)

The SCAEP Fact Sheet (PROPOSED AIRSPACE CHANGES FOR RUNWAY 13/31 FREQUENTLY ASKED QUESTIONS) presented at the Verrierdale Hall session shows new and contradictory information:

- Verrierdale overflown
- Noise events at Verrierdale 55-75dBA
- N70 events shown for Verrierdale
- Weyba Downs overflown (map shows 3 km wide noise corridor for arrival only – up to 6 km wide noise corridor can be expected.
- Noise events at Weyba Downs up to 63dBA
- Noise events at Marcus Beach up to 63dBA

To have provided residents with new and conflicting information in this community consultation phase is inhibiting residents to trust that any previous information supplied by the proponent and ASA and feel assured that information is correct and applicable to their situation. The cross referencing of over 3000 pages of documentation is an enormous and unrealistic task for residents to perform in the current community consultation period of less than 6 weeks.

Consistent, applicable and accurate facts and figures has not been provided and an extension to this consultation period is essential for potentially affected to access, understand and apply information to their own situation particularly when much of the language and technical terminology would be new to many.

#### ***ASA involvement from the beginning of the process***

The Aircraft Noise Ombudsman's (ANO) report into the introduction of new flight paths in Hobart made several recommendations for ASA to improve community consultation. Many of these issues that arose in ASA's introduction of new flight paths in Hobart are the same issues that arose in ASA's introduction of flight changes in Perth in 2015. The first of which was to:

*Incorporate consideration of potential noise impacts from the commencement of the flight path design process and integrate that consideration throughout the design process.*

(ANO – Investigation into complaints about the introduction of new flight paths in Hobart April 2018)

ASA advised verbally at the Verrierdale Hall community consultation session that they were not responsible for the concept flight path designs and that they were 'just working off what was in the EIS'. Participants were told by an ASA representative that the initial concepts shown in the EIS were designed by Wilkinson Murray – an acoustic and sound consultancy firm who were employed to undertake the noise modelling studies for the EIS. However, the EIS states that ASA were involved in the development of airspace options. (EIS Chapter D2 2.1). The former would appear to be the case given ASA's inability to respond with knowledge about why these flight path proposals are under consideration and what other airspace options were considered at an early stage. In light of this it is clear that ASA have not met the ANO's recommendation as above with regard to community engagement and consultation.

It is interesting to note, in the light of the above, that the proponent issued the directive, 'avoid Sunshine Coast population areas' to those responsible for flight path design, be it Wilkinson Murry or ASA (EIS Chapter D2 Fig 2.7a). Was this the moment at which the fate of the more northerly communities in the Noosa Shire was decided? When referencing the 2007 Master Plan for development of areas south of the airport it could be viewed as such. We have yet to be disabused of this notion by either ASA, SCA or SCRC.

#### ***Failure to address interim complaints lodged prior to the deadline for submissions – 30 April 2019***

ASA has failed to articulate any alternative flight path plans for consideration by the affected areas. This does not support an effective consultation outcome as the community needs to understand the implications of all possible options supported by full transparent disclosure. ASA have also failed to provide potential options and alternative solutions for the public to consider prior to the 30 April 2019.

Many complaints and queries have been lodged with ASA with the sole purpose of receiving a meaningful response prior to making a submission before the 30th April 2019. This information is necessary for stakeholders to develop a meaningful submission for review. Many residents have received only a generic

email response from ASA to their submissions citing their inability to respond individually due to the overwhelming number of feedback responses.

***Environmental concerns***

Although OSCAR's concern about this process relate to inadequate community consultation, we are also concerned about the environmental impact of the proposed flight paths that appear to have been inadequately dealt with.

These concerns include, but are not limited to:

- There has been no Environmental Impact Study (EIS) on sensitive environmental areas under the now proposed flight paths – ie Lake Weyba and the Marcus Castaways national Park.
- The proposed flight paths are over several recognised wetland areas that are home to a number of endangered wildlife and migratory birds which were not mentioned in the 2014 EIS.
- There has been no comprehensive noise study completed for the most recent flight path proposals. This should be independently implemented before any approvals by ASA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Greg Smith', written in a cursive style.

Greg Smith  
**President**