



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872 - email: bmc@bluemountains.org.au

Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

Air Services Australia
Via Declan Drake
Newgate (0477 119 991)
declan.drake@newgateengage.com.au

6 February 2020

CONSULTATION ON ASA DRAFT FLIGHT PRINCIPLES

Dear Sir

The Blue Mountains Conservation Society (BMCS) is a community-based volunteer organisation with over 850 members. Its mission is to help conserve the natural environment of the Greater Blue Mountains, and to increase awareness of the natural environment in general.

REQUEST RE-EXHIBITION OF DRAFT FLIGHT PRINCIPLES

The BMCS is of the opinion that the nature in which the consultation process has been undertaken is insufficient in both the time provided for submissions and the lack of prior consultation and engagement with groups and individual. As a result, BMCS requests an extension of consultation period for a further 4 weeks with advertising in local newspapers (at the commencement of the 4 weeks) and at least 2 workshops to be conducted in NSW.

BMCS has significant concerns in regard to the Draft Flight Principles as the Blue Mountains are likely to be affected by flight paths from the under construction Western Sydney Airport and also possibly from Katoomba airfield.

The Society objects to this process which has failed to notify local communities potentially affected and environment advocates. For example, residents of the Blue Mountains who were registered to be kept updated were only notified on Jan 22. This date is one week after the start of the 4 week 'consultation' period. The Society only by accident became aware that there was a consultation process and that the period for consultation had already commenced. To the best of the Society's knowledge no notification was undertaken in the Blue Mountains to inform residents and interested parties.

The Society objects to the lack of opportunities for residents and community groups to attend workshops – only 6 were held across Australia, with just 1 in each state except for none in NSW, all with inadequate notification.

BMCS's SUBMISSION ON DRAFT FLIGHT PATH DESIGN PRINCIPLES

The Society believes that **an additional Principle** should be included or that words to the same effect as follows be added to Principle 6 to expand on the issue of 'noise sensitive' natural areas.

Consent shall not be granted to flight paths proposed over listed World Heritage Areas unless the consent authority:

- (1) has considered the impact of the proposal on the World Heritage values and visitor experience, and*
- (2) is satisfied that the proposal will have no adverse impacts on the World Heritage values or visitor experience*

Also we propose the following changes to the Draft Principles:

Principle 3 - the word 'practicable' should be deleted from this principle which is designed to minimize further any requirement to protect the environment. This draft principle is which is already only a very soft guideline to 'minimise', far short of an effective standard for fuel consumption or emissions.

Principle 4 - the word 'practicable' should be deleted from this principle, it should be clearly stated that the protection of areas of National Environmental Significance is a priority. The inclusion of this word discounts any need to protect Matters of National Environmental Significance.

Principle 6 – This principle implies that only residential and human dominated areas are 'noise sensitive'. It needs to be amended to clearly state that flying over natural areas is

not acceptable as these are 'noise sensitive' areas. Flights over industrial and low-density rural areas should be prioritised for flight path concentration.

Principle 8 - should be deleted. Fly Neighbourly Agreements **are not** enforced by any regulatory body, and only serve to frustrate effected communities and advocates for the natural environment. These are just a public relations exercise and should be abandoned unless a government agency is given the powers and responsibility to enforce the agreements.

Principle 14 – The Society opposes this principle in full. The promotion of the maximisation of air traffic can only contribute to increased carbon emissions which is contrary to our international responsibility and obligations in relation to reducing Greenhouse gas emissions. Any promotion of air travel using current technologies significantly impact by increasing the emissions of greenhouse gases and increasing noise and other impacts in the broader community.

If you wish to discuss the **Society's** submission, please call Adam Curry on 0425 326842.

Yours sincerely

Tara Cameron
President
Blue Mountains Conservation Society