



**Gecko - Gold Coast and Hinterland Environment Council** Assn Inc.

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13 July 2015

Chief Operating Officer  
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cc. The Hon Warren Truss MP  
Minister for Infrastructure and Regional Development  
Suite MG  
41 Parliament House  
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Email: [warren.truss@dpm.gov.au](mailto:warren.truss@dpm.gov.au)

Dear Sir

**Re: Gold Coast Airport Pty Ltd / Airservices Australia – ILS Major Development Plan**

Gecko- Gold Coast and Hinterland Environment Council Assoc Inc (Gecko) thanks you for the opportunity to offer this submission in respect of the above proposal. Gecko is the peak environmental group in the Gold Coast, Queensland region and is a not-for-profit environment association founded in 1989. We have been active for the past 25 years in protecting the environmental values and ecological sustainability of the Gold Coast, Queensland and in the wider geographical region. Our organisation has had a long familiarity with issues relating to Airport Management Plans, Major Development Plans and other projects impacting upon the local area, including construction of the Tugun Bypass. We have worked cooperatively with a number of New South Wales environmental and community groups on cross-border issues in the past and have formed close alliances with them with the common goal of protecting the environmental values of this area. In addition, as a community-based organisation, Gecko is concerned with the amenity of the built environment.

We offer the following comments on the ILS Major Development Plan (the **Airport's MDP**) for the new Instrument Landing System (ILS) proposed by Gold Coast Airport and Airservices Australia (collectively the Airport) which would involve creating a new flight path over the Gold Coast residential area (the New Flight Path).

For the reasons set out in this document, Gecko strongly objects to the Airport's MDP.

**1. Environmental Impacts**

The MDP reports only a desktop review and three single, limited surveys of only the ESI areas of the proposal and does not assess impacts within the wider context. Gecko is of the opinion that in determining whether or not this MDP is approved, decision makers should require consideration of the broad geographical area impacted by airport development as well as immediately adjacent activities.

During construction of the Tugun Bypass there were profound environmental impacts on flora and fauna through massive vegetation clearing including impacts on the local populations of some protected species listed in the MDP, notably the Wallum froglet. Potential impacts flowing from this MPD are stated thus:

*5.6.3 Assessment of Impacts –Significant Flora and Fauna*

### *Glidepath Footprint*

*No impact is anticipated as no significant flora or fauna have been recorded within, or are likely to inhabit the glidepath footprint.*

### *300 metre Runway Strip*

#### *Fauna*

*Complete removal of ESA Impact Area A (1.3 hectares) will remove this habitat area for Wallum Froglet, though this is expected to provide a minor impact to the species due to the wide occurrence of the species in other areas within the airport boundary, and the extent of known populations along the northern New South Wales and south-east Queensland coastline. Removal of ESA Impact Area A is likely to result in a minor impact to the other significant species that may inhabit the area.*

The current existence of this reported wide occurrence within the airport boundary is not substantiated in the MDP nor is there reference to contemporary studies of the current populations to the north and south of the airport. Detailed studies were conducted for the Tugun Bypass project in 2006, nine years ago and there is no information presented in the MDP to justify an additional impact on this EPBC listed species which was negatively affected by the construction of the Tugun Bypass. The continuing erosion of environmental values in the cross border areas through a range of development proposals, including the current MDP, is justified at each stage that by understating the impacts of the latest proposal and serves to pave the way for the next development application. The well-known adage of “death by a thousand cuts” applies here. The cumulative impact of development over time could potentially lead to the localised extinction of this species. The impacts on the Wallum froglet and other frog species utilising the Airport precinct species as a result of increased flight numbers, **facilitated by approval of this MDP** include increased noise levels, which are not addressed, but which will likely intrude upon calling during the mating season.

We offer the following comments on environmental impacts in NSW.

#### **SUMMARY OF ISSUES FOR ILS DEVELOPMENT ON NSW CROWN RESERVE, TWEED HEADS WEST.**

- The Localiser footprint is approx. 300 x 300m along the shore of the Lower Tweed River Estuary, Cobaki Broadwater.
- The footprint includes a 200 x 90m ground pad with reflective surface, access road around entire footprint, trenching for communications infrastructure, drain diversion.
- These works will involve substantial fill and disturbance of soils with earthworks impacting on Acid Sulfate Soils and related heavy metal ground/surface water contamination.
- The road will result in substantial impacts to hydrological regime and tidal inundation with a wall (road) across more than half the last remaining floodplain on the east of the estuary.
- 7.5ha of vegetation clearing includes 4 Endangered Ecological Communities – Saltmarsh, Subtropical Coastal/Swamp Oak Floodplain Forest and Swamp Sclerophyll Forest.
- The removal of 3.5ha of Saltmarsh constitutes a significant proportion of the total Saltmarsh community in the Cobaki Broadwater, removing the largest and most valuable single remaining patch.
- Removal of 3.1ha of mapped NSW SEPP 14 Coastal Wetland is inconsistent with the aim of the policy to ensure that coastal wetlands are preserved and protected in the environmental and economic interests of the state.
- The removal of Saltmarsh at the site constitutes 50% reduction in available roosting and foraging habitat for migratory/marine species listed under the Commonwealth EPBC Act.
- The Cobaki Broadwater is Class 1 Fishery and is vital to the survival of commercial and recreational fishing industries that significantly contribute to the NSW economy. The proposed development will permanently destroy critical fishery habitat and result in long term cumulative impacts to this important fishery and part of the Tweed River system.
- The Crown Reserve is an integral part of the Murrumbidgee Landscape which is of extreme importance to the local Aboriginal community and includes values of national heritage significance.
- The proposal is exempt from any land-use laws/regulations or any approvals. And will result in significant adverse economic, social and environmental impacts to a nationally significant landscape.
- The component of the ILS development on the NSW Crown Reserve for Public Recreation/Conservation is not identified in GCA’s Master Plan as required under the Airports Act.

In the absence of the ability of the community to access more up to date information or to conduct their own examination of the airport precinct, from which they are excluded it is not possible to offer more constructive comments on the statements on environmental matters in the MDP. Gecko recommends more detailed on-ground environmental studies should be conducted by an independent agency to determine the current environmental values in this area.

Airservices Australia (ASA) as the proponent for the ILS provides immunity from state land use laws (pg.4) allowing destruction of state protected wetlands (SEPP 14), four NSW Endangered Ecological Communities, threatened species habitat and critical fishery habitat of the Cobaki Broadwater, a Class 1 Fishery vital to the survival of commercial/recreation fishing industries protected in the economic interests of NSW. The loss of the Saltmarsh Community removes the largest and most valuable single remaining patch in the Cobaki Lakes area. The degree of harm will be permanent and irreversible and clearing under this MDP, if approved, would facilitate a future application for a further runway extension.

## **2. Aboriginal Heritage**

Gecko offers its support for the submission by the Tugun Cobaki Alliance (TCA) highlighting the enormous cultural and historical importance of the ancient Aboriginal campsite complex known as Murraba, which includes land on which the airport is located and also that proposed to house the ILS infrastructure. This area is also proposed to accommodate the proposed extension to Runway 14 to the south, an action which will totally destroy the Aboriginal values there. Gecko joined with many groups in 2005, to request emergency listing on the National Heritage List for the *Murraba National Heritage Landscape*. The application failed at that time due to the limited scope of excavations that had been undertaken. Since that time, however, a large number of reports have been compiled from archaeological investigations conducted in several locations within the Murraba Cultural landscape. These reports are detailed in the TCA submission and demonstrate the need to protect this area from further developmental impacts in order to preserve a site of national significance.

This information contrasts starkly with the very limited discussion in the MDP at 5.7.1.

## **2. Poor rationale for introduction of the system**

As member of the Airport's Community Aviation Consultation Group (CACG), the writer has attended meetings over the past several years during which the ILS was discussed. The clear impression derived from these meetings was that the system would be used only a few times a years, during bad weather. The discussion was almost exclusively about the reduction of noise impacts for communities to the south of the airport, not the large increase in noise for residents from Surfer's Paradise to Palm Beach. Minuted in the CACG meeting held on 26 March 2014 refers to procedures "*limiting the use of the ILS, as it is expected that aircraft will use RNP approach where possible*". This was strongly suggestive that there would be very limited use of an ILS. Later, on 31 October 2014, CACG members received advice that "*By 2015, about 90% of aircraft landing at this airport will use Smart Tracking with the remaining 10% equipped in the next 5-10yrs*". It is information of this nature that was conveyed back to our Management Committee and to members enquiring on the proposal.

This information was followed by the media release issued by Minister for Infrastructure and Regional Development Warren Truss on 13 November 2014, when Smart Tracking was launched at Gold Coast Airport. We note this quote from Federal Member for McPherson Karen Andrews, who said that, "the Smart Tracking flight path will have significant environmental benefits for the Gold Coast community.

"The new system is expected to improve noise outcomes for communities located to the north of the airport by keeping aircraft flying over the water for longer and minimising time flying over houses," Mrs Andrews said.

"Smart Tracking will also let more planes land in inclement weather, as well as provide fuel cost savings and reduce impacts on the environment.

"This technology will certainly enhance the airport's international and domestic standing and help meet future growth in demand."

There is no mention of the significant negative impacts to communities to the north and failed to alert residents to the real impacts of introducing an ILS to the airport.

While improved aircraft safety is stated as the motivation for installing the ILS, there is an economical motive revealed in the media when it was announced a deal had been struck to commence twice weekly flights to and from China which “ would bring more visitors to Queensland than ever before.” (GC Bulletin 1)

One may rightly question to what extent the ILS is being imposed on Gold Coast residents purely to accommodate planes not fitted with modern technology.

### **3. Reliance on NSW Crown land for installation of the ILS and for further airport development**

As a CACG member, the writer formed the view that delays in releasing the MDP were because of the negotiations relating to securing a lease over Crown Reserve 59360 gazetted since 1926 for Public Recreation. It was initially understood by the community that the GCA Lease would only be over a small area for the Instrument Landing System (ILS) when in fact the GCA lease granted on 18 October 2014 is over the whole Reserve, previously zoned as Public Recreation. The long term purpose of the Lease for runway extension was not revealed to the public.

Runway extension to grow the business of a private company and increase shareholders profits is not critical infrastructure. It is disturbing that the Lease allows GCA to have “exclusive possession” of a Reserve previously gazetted for Public Recreation. The lease was granted with no public consultation during which time the serious relating to the destruction of significant environmental and Aboriginal values could have been raised.

The NSW government granted the Lease to the private Qld company for the specific purpose of “*Airport Infrastructure as a permitted use means ANY and ALL airport facilities, services, utilities and works...installation and operation of an ILS...and works associated with runway extension...*”. GCA’s documents to the NSW government 2013 re their short/medium term developments on the Reserve state, “*In the short term, development will be undertaken by Airservices Australia for the ILS. This facility and the associated ground preparation will occupy a considerable proportion of the land proposed to be used on a long-term basis for airport infrastructure.*”

Airport Infrastructure as a permitted use means any and all airport facilities, services, utilities and works associated with incidental to or ancillary to the lawful operations of Gold Coast Airport, including vegetation management to maintain the Obstacle Limitations Surface (OLS), installation and operation of an Instrument Landing System (ILS), aviation transport safety and security, and works associated with runway extension and/or enhancement.

### **4. Failure to address cumulative impacts in EPBC referral**

The GCAL Referral document Project 2018 (EPBC 2014/7266) under the Environmental Protection and Biodiversity Act fails to provide adequate information at **2.7 A staged development or component of a larger project** which states:

*If you have identified that the proposed action is a component of a larger action (in section 1.12) you must complete this section. Provide information about the larger action and details of any interdependency between the stages/components and the larger action. You may also provide justification as to why you believe it is reasonable for the referred action to be considered separately from the larger proposal (eg. the referred action is ‘stand-alone’ and viable in its own right, there are separate responsibilities for component actions or approvals have been split in a similar way at the state or local government levels).*

**GCAL Response:** *The ground components of the ILS project, on Commonwealth and NSW State Land, are the subject of this referral. The proposed change of flight paths arising from installation of the ILS will be the subject of a separate Airservices referral (s.161/160) under the EPBC Act.*

Yet the clear intention to extend the runway, which requires control over Crown reserve, was stated in a letter from GCAL to the NSW Dept of Planning and Infrastructure dated 25 November 2013 obtained under Right to Information (GIPAA - 2014/15-070).

### **4. Conflicting information on need for an ILS**

The MDP states on average 50 flights per annum have to be diverted because of poor visibility during weather events, yet the letter referred to above (GIPAA - 2014/15-070) claims “there are fairly frequent instances of the

inability of aircraft to land owing to poor weather conditions. " This was misleading and in setting up the lease over Crown land implied a greater need for the ILS than actually exists.

The Airport has confirmed in its information brochure "Gold Coast Airport ILS major development plan: Flight path information" (the **Airport's Information Brochure**) that the ILS is not necessary from the perspective of the safety of operations at the Gold Coast airport and that flights are currently safely arriving at the Gold Coast airport without an ILS.

The Airport's MDP and the Airport's Information Brochure make the representation that the ILS is only being implemented by the Airport to reduce diversions during bad weather and is only likely to be used during bad weather.

However, elsewhere in the Airport's MDP it is stated:

- (a) the ILS will also be available to be used for training; and
- (b) "a landing approach [ie the New Flight Path] supported by an ILS will make Gold Coast Airport a more attractive airport in terms of aircraft approach options and support the growth of International Airline markets to Southeast Queensland and Northern New South Wales" and that "Gold Coast Airport requires infrastructure that supports future growth opportunities from high yielding visitor markets across the Asia/Pacific region"<sup>1</sup>.

On this basis, it is much more reasonable to expect that a majority of aircraft using the Gold Coast airport will use the New Flight Path as a result of the implementation of the measures proposed in the Airport's MDP.

It is unfortunate (and concerning) that this is not clearly explained and described in the Airport's MDP and that the Airport has instead chosen to represent that the objective of the ILS (and the New Flight Path) is to reduce weather related diversions and that the ILS (and the New Flight Path) is only likely to be principally used in bad weather.

In an interview on ABC Radio Coast FM on 26 June 2015 <sup>2</sup>, the Airport Chief Operating Officer, David Collins was questioned on why the new flight path could not have a trial run so that residents could experience the real noise impacts. The response was that Air Services had determined that a significant amount of training information would have to be put out to pilots flying on this route and consequently ruled this out. Mr Collins also stated that pilots landing from the north would be able to use the ILS at their discretion.

According to the independent aircraft noise ombudsman, based on historical data the ILS is expected to be used about 240 days a year, **not** only 140 days as represented in the Airport's MDP.

Given the poor quality of information and mixed messages on the frequency of flights that would utilise the new flight path, the community is unable to determine the impacts they will experience. Once implemented there is no indication there would ever be the opportunity for the flight paths to revert back to those currently in use except under very limited circumstances.

As a result of the manner in which the Airport has chosen to present the proposed ILS in its MDP, there is a very real risk that concerned stakeholders, especially the Gold Coast community who will be adversely impacted by the New Flight Path, have not properly understood (and therefore, have not had a proper opportunity to consider and respond to), the full extent of the potential impact that the ILS and the New Flight Path is likely to have on the community.

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For all of the above reasons Gecko strongly object to the Airport's MDP, the proposed new ILS and the proposed New Flight Path and considers the Airport's MDP should not be approved.

Yours sincerely



Mrs. R. Adams  
Secretary

#### References

1 ABC Radio Coast FM 24 June 2015

<http://blogs.abc.net.au/queensland/2015/06/first-half-hour-26th-june-2015-airport-boss-reacts-to-planning-committee-ils-criticisms.html>

2Gold Coast Bulletin 5 May 2015

<http://www.goldcoastbulletin.com.au/lifestyle/jetstar-to-fly-gold-coast-to-china-direct-twice-weekly-after-airport-government-corporate-partnership-deal/story-fnjdw5o-1227336504633>