

T6-16-444, LA31699  
RJ:EF

13 March 2017

NORTHERN JOINT REGIONAL PLANNING PANEL  
C/- LISA FOLEY  
PROJECT OFFICER  
PLANNING PANELS SECRETARIAT  
DEPARTMENT OF PLANNING AND ENVIRONMENT  
GPO BOX 39  
SYDNEY NSW 2001

Dear Lisa

**T6-16-444 PROPOSED PILOT TRAINING FACILITY, KEMPSEY AIRPORT, LOT 1  
DP11444474, AIRPORT ROAD, ALDAVILLA – APPLICANTS RESPONSE TO PUBLIC  
SUBMISSIONS**

Please find enclosed a copy of the applicant's response to public submissions received in regards to the abovementioned development application. Please note that the enclosed response to submissions document was accompanied by an "Attachments" appendix. However, given this part of the document was over 630 pages in length, and was not received by Council until after 5pm on Friday 10 March 2017, Council has advised the applicant that the attachment appendix will not be accepted by Council or provided to the panel members.

Should you require any further information please contact the undersigned on 6566 3340.

Yours faithfully



Rachael Jeffrey  
TOWN PLANNER  
SUSTAINABLE ENVIRONMENT

Responses to Issues Raised (Ref: T6-16-444, D16/51494, LA 31699)	
No.	Issue Raised
1	<p>The increase in flights at night will result in an unacceptable impact on nearby resident's lives due to aircraft noise.</p> <p><b>Response</b></p> <p>It is acknowledged that the night flying is an increase over current levels as there is very minimal night flying taking place at YKMP airport. AIAC projects that night flying once our maximum student capacity is reached (250 students with 150 active flying students) will be 20% of our total flying activity. Night Flying will be scheduled according to the following seasonal hours: (DEC, JAN, FEB 19:30 – 23:30), (MAR, APR, MAY 17:00 – 23:30), (JUN, JUL, AUG 17:30 – 23:30), (SEP, OCT, NOV 18:00 – 23:30)</p> <p>AIAC will however work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to specified times (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights which can arrive and depart at any time (just like any itinerant aircraft operated by someone other than AIAC could do).</p>
2	<p>The noise will impact the Aldavilla School, nearby nursing home and Kempsey Hospital</p> <p><b>Response</b></p> <p>The aircraft that AIAC operate are the latest models operating in Australia. Typically, general aviation flying schools in Australia operate older generation Cessna and Piper aircraft. The Diamond DA40 aircraft AIAC operate have far lower noise emissions than the typical general aviation aircraft that other Australian flying schools operate. A typical aircraft such as a Cessna 172R or Piper PA28 have a Decibel Rating of 75MdBa and 74MdBa, whilst the Diamond DA40NG that AIAC operate have a decibel rating of 71.4MdBa. <i>This is the maximum noise emission at take-off power</i>, which is used for the take-off and initial climb only, which for circuit operations is typically 90 seconds. Take-off time is approximately 16.6% of the total time to fly a standard circuit. The power settings are then at 50% for 66.66% of the circuit, then below 25% power for the remaining 33.33% of the circuit.</p> <p>The noise impact on the Aldavilla School, Nursing Home and Kempsey Hospital are all very minimal as they are all located outside the 70dBA and 60dBA noise emission contours that would only be experienced in the vicinity of the runway. At worst, the Aldavilla School could experience a maximum of 30dBA which is at or below ambient environmental noise levels. The nursing home and hospital are outside these noise contours. Refer to Figures 5 and 6 of the Aircraft Noise Assessment.</p> <p>AIAC would also like to emphasise that the noise consultant who prepared the Aircraft Noise Assessment, although hired by AIAC, is completely independent and was not influenced by AIAC in any way. AIAC provided information on our aircraft type, the description of a normal circuit pattern flightpath for our aircraft, our student numbers, projected flying movements, and hours of operation. The consultant then independently reviewed this data and modelled it in accordance with international standards.</p>
3	<p>The proposed significant increase in flight numbers is not acceptable.</p> <p><b>Response</b></p> <p>Kempsey Airport has for some time been a significantly underutilised public asset. During 2009, Kempsey Council explored various options of cost recovery for the Airport as a largely dormant asset which was expensive to maintain. One of these options was a staged withdrawal from the airport. The local community protested significantly against this decision. Eventually, a memorandum of understanding was entered into between Kempsey Shire Council, Port Macquarie Hastings Council and Taree City Council to establish a Mid North Coast Regional Aviation Centre of Excellence. This was established with the aim to stimulate use at mainly Kempsey and Taree airports and to attract investment into the airports. AIAC agreed to locate some of its flying operations at Kempsey Airport, as this was a very clear aim for the local governments concerned. AIAC's projected growth and investment at Kempsey Airport is aligned with the local government's strategy to promote better utilisation of a dormant asset and therefore reduce the burden of local ratepayers (as AIAC operations at Kempsey Airport attract a "user-pays" fee structure). In order for Kempsey Airport to</p>

	<p>remain as a viable business option for AIAC, a certain level of flight frequency is needed to ensure that student syllabus hours are met.</p> <p>AIAC understands that, some residents who reside in proximity of the Airport have the view that AIAC's flying activity is unacceptable, the airport and surrounding airspace is provisioned for public aviation use. To this end, AIAC will ensure it conducts its operations in accordance with Federal, State, and Local Government legislation and rules and will continue to operate with high levels of safety, whilst mindfully respecting surrounding residents</p>
4	<p>Doubt whether the noise levels stated within the noise assessment are correct at our property near runway 22.</p> <p><b>Response</b> The noise modelling utilised in the Aircraft Noise Assessment has been developed using methodology and models that are accepted by the Australian Federal Government Authority responsible for aircraft noise issues, Airservices Australia.</p> <p>AIAC would also like to emphasise that the noise consultant who prepared the Aircraft Noise Assessment, although hired by AIAC, is completely independent and was not influenced by AIAC in any way. AIAC provided information on our aircraft type, the description of a normal circuit pattern flightpath for our aircraft, our student numbers, projected flying movements, and hours of operation. The consultant then independently reviewed this data and modelled it in accordance with international standards.</p>
5	<p>What constitutes the background ambient noise in the vicinity of the Kempsey Airport as referred to in the SoEE?</p> <p><b>Response</b> Background noise in rural environments is typically measured around 35dBA and relates to the ambient noise in the environment.</p> <p>There is a lot of literature which identifies background noise levels, which tend to range from from 30 the 45dBA.</p> <p>See attached documentation:</p> <ul style="list-style-type: none"> <li>• Bistafa, S.R., &amp; Bradley, J.R. (2000). <i>Reverberation time and maximum background-noise level for classrooms from a comparative study of speech intelligibility metrics.</i></li> <li>• Jiang, L., &amp; Kang J. (2015). <i>Combined acoustical and visual performance of noise barriers in mitigating the environmental impact of motorways.</i></li> <li>• Kempsey Airport – Aircraft Noise Assessment (2017)</li> <li>• Australian Government <a href="http://aircraftnoise.com.au/causes-of-aircraft-noise/measuring-aircraft-noise/">http://aircraftnoise.com.au/causes-of-aircraft-noise/measuring-aircraft-noise/</a></li> </ul>
6	<p>Aircraft fly very low (approximately 150m) over nearby dwellings despite Council contacting the pilot training school about this practice, and them saying it wouldn't happen again, it still is occurring.</p> <p><b>Response</b> Any low flying operations that AIAC performs are performed within the normal course of air navigation and what is permitted in the Civil Aviation Regulations and Civil Aviation Safety Authority Part 61 Manual of Standards.</p> <p>The "low flying" that is being referred to here relates to the type of flight training permitted.</p> <p>Whenever contacted by Council in relation to noise or flight complaints, AIAC review the applicable regulations and generally contact the Civil Aviation Safety Authority as a safeguard to ensure we are conducting our operations within the regulatory framework.</p>

	<p>In relation to this matter specifically, AIAC has provided a detailed response to Council previously outlining this. At no time has AIAC mentioned that these manoeuvres would not happen again, as they are permitted under the Civil Aviation Safety Regulations.</p> <p>Refer attached email dated Friday, 27 May 2016.</p>
7	<p>Consultation undertaken by council was inadequate.</p> <p><b>Response</b> N/A – This issue appears to be for Council to respond to.</p>
8	<p>The emissions from the increase in flights will result in pollution of:</p> <ul style="list-style-type: none"> <li>• Council water supply;</li> <li>• rural tank water supplies;</li> <li>• the Macleay River;</li> <li>• local air quality;</li> <li>• fertile grazing land; and</li> <li>• food consumed from vegetable gardens.</li> </ul> <p><b>Response</b> The engines that AIAC's aircraft operate are Austro E4-A engines with 123Kw of power. These engines meet not only the Australian standards (under the <i>Aircraft Engine Emissions Regulations (Cth)</i>) but also the European Union (EU) emissions standards, which are considered the international standard. EU Directive 97/68/EC specifies that the emissions must not exceed:</p> <ul style="list-style-type: none"> <li>• Carbon Monoxide: 3.5 grams /KWh</li> <li>• Hydrocarbons: 0.19 grams /KWh</li> <li>• Nitrogen Oxides: 0.4 grams /KWh</li> <li>• Particulate Matter: 0.025 grams /KWh</li> </ul> <p>When compared to a typical bushfire, which occur with high frequency in the Macleay Valley, through back-burning and natural causes, in which daily emissions can be in excess of 5 tonnes per day, (<i>Carbon Monoxide, Alkanes, Alkenes, Aldehydes, Organic Acids, Nitrogen Compounds, Sulphur Compounds, Particulate Matter, Carbon</i>) the emissions from AIAC training fleet are negligible, which could be around (based on maximum emission standards) 507.5 grams of emission per aircraft, per hour.</p> <p>If, for example, AIAC operated its maximum projected fleet of 20 aircraft for a continual 8 hours a day, the maximum emission would possibly be around 81kg a day. This would be based on AIAC operating 20 aircraft at full power for 8 continuous hours (which will not be the case).</p> <p>Refer to attached:</p> <ul style="list-style-type: none"> <li>• Langman, B., Duncan, B., Textor, C., Trentmann, J., &amp; van der Werf, G.R. (2008). <i>Vegetation fire emissions and their impact on air pollution and climate</i>.</li> <li>• Meyer, C.P., Luhar, A.K., &amp; Mitchell, R.M. (2007). <i>Biomass burning emissions over northern Australia constrained by aerosol measurements: I—Modelling the distribution of hourly emissions</i>.</li> <li>• <a href="https://www.dieselnet.com/standards/eu/nonroad.php">https://www.dieselnet.com/standards/eu/nonroad.php</a></li> </ul>
9	<p>The noise from the planes will cause unacceptable impacts to nearby residents during the day also (i.e. shift workers trying to sleep in the day and retirees that spend much of their day at home)</p> <p><b>Response</b> AIAC is mindful that its operations will be a change from what residents who have chosen to live in proximity to a registered airport have become familiar with, as Kempsey</p>

	<p>Airport has, by best part, essentially been unused for several years. To this end, AIAC is committed to developing a noise management plan in conjunction with the Kempsey Shire Council that will consider residents who live in proximity to the airport.</p> <p>It is also important to take in to consideration the impact of aircraft noise when purchasing a property that is located in proximity to an airport. The Australian Government website <a href="http://aircraftnoise.com.au/what-you-can-do/">http://aircraftnoise.com.au/what-you-can-do/</a> which details the things to consider if purchasing a property within proximity of an airport.</p>
10	<p>The proposed extension of flying times from 6am until midnight seven days a week in Summer is of great concern.</p>
	<p><b>Response</b>  Due to the nature of the regulations for both CASA and the nations of the airlines that the college conducts flight training for, there is a set amount of night flying hours each student must perform.</p> <p>Some of this flying is away from the Airport, i.e., cross-country night navigation, and some of the night flying involves touch-and-go circuit operations at the Airport.</p> <p>AIAC must fulfil the contractual and regulatory night flying requirements for its students and customers. We do understand that night training in the circuit area will be noticeable (compared to what the level of airport usage is now), however the aircraft we operate have very low noise emissions as outlined in the Aircraft Noise Assessment.</p> <p>AIAC will work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights that can arrive and depart at any time (just like any other itinerant aircraft which is not operated by AIAC could do).</p>
11	<p>Council's notification process is lacking transparency</p>
	<p><b>Response</b>  N/A – This issue appears to be for Council to respond to.</p>
12	<p>Will the flying school have freehold title of the land where buildings are to be located? No other owner of buildings at the airport has this and it seems the flying school is receiving preferential treatment.</p>
	<p><b>Response</b>  AIAC has asked for an option to convert the leasehold option to freehold. We are certain that the benefits of our operation, as it grows, will contribute significantly to the Kempsey community (refer to response number 26 below for further on this).</p> <p>AIAC has a staged progression plan for the development of the college and, to achieve later stages, we are most likely going to be reliant upon a range of funding sources and investment. It will be difficult to attract funding and investment with leasehold land. We consider that it is very unlikely that AIAC is receiving preferential treatment; we believe anyone could make an enquiry with Kempsey Council regarding freehold title at Kempsey Airport, which would be considered by the Kempsey Shire Council.</p>
13	<p>The increase in flights and noise will negatively impact the value of nearby properties.</p>
	<p><b>Response</b>  There is no evidence to support this for a general aviation airport where light aircraft operate. We accept that aircraft noise at certain airports, such as large metropolitan airports with high capacity jet aircraft operations, could have a negative influence on property prices. However, the studies that have been conducted at major airports such as Amsterdam Schiphol have concluded that as modern aircraft have become quieter, property prices in noise affected areas at large international airports have increased. The studies show that for every 1-decibel decrease in aircraft noise, property values have increased by around 1872 Euros (\$2,606 AUD). It is important to understand that all studies on aircraft noise are related to transport category aircraft, (because they do</p>

	<p>generate a substantial amount of noise in certain phases of flight); the aircraft that AIAC operate are light 4-seat aircraft, that have the lowest noise emissions of any piston-engine light training aircraft.</p> <p>For further information, refer to:</p> <ul style="list-style-type: none"> <li>• Dekkers, J.E.C., Willemijn van der Straaten, J. (2009). <i>Monetary valuation of aircraft noise: A hedonic analysis around Amsterdam airport</i>.</li> <li>• Lijesen, M., Dekkers, J.E.C., Willemijn van der Straaten, J, van Elk, R., and Blokdijk, J. (2009). <i>How much noise reduction at airports?</i></li> </ul>
14	<p>The noise assessment is flawed as we cannot continue a conversation if outside when a plane flies over due to the noise.</p> <p><b>Response</b>  This noise assessment utilised the Integrated Noise Model (INM) in calculating the noise contours. This software is internationally recognised and is endorsed by Airservices Australia and the Department of Defence for the calculation of such impacts. This noise assessment calculated the 60 and 70 dB(A) <math>L_{Amax}</math> noise contours which show the maximum noise levels anticipated in the vicinity of the aerodrome. <u>There are no identified residents (known as 'receivers' under the normal convention used by noise consultants) located within the 70 dB(A) maximum noise level contour.</u></p> <p>Maximum noise levels are generally assessed with indoor sound levels for normal domestic areas in dwellings in mind. The report uses thresholds of 60 and 70 dB(A) as these represent the equivalent indoor design sound levels for normal domestic areas in dwellings as specified in Australian Standard 2021:2015.</p> <p>The report explains that an <u>internal</u> noise level of 60 dB(A) is the sound pressure level of a noise event that is likely to interfere with conversation or with listening to the radio or television. An internal noise impact of AIAC's operations is not anticipated, as the fabric of a dwelling attenuates noise levels by at least 10 dB(A). This means that internal noise levels of dwellings located within the 60 dB(A) maximum noise level contours are not anticipated to experience noise levels likely to interfere with normal conversation (as internal effects of noise would be approximately 50 dB(A)). When outdoors, noise levels of approximately 60 dB(A) may be experienced by anyone located within the 60 dB(A) contour which may briefly interfere with normal conversation during an aircraft flyover. As such, interrupted conversation outdoors is not a metric upon which to judge the validity of this assessment.</p>
15	<p>Noise is worse when the planes are carrying out the stalling practice and powering up exercise.</p> <p><b>Response</b>  We consider that this is incorrect for the following reasons:</p> <ul style="list-style-type: none"> <li>• Stalling exercises are conducted at a minimum height of 3500 feet above ground level, where noise emissions would be very minimal;</li> <li>• Stalling exercises are performed at idle power then an increase to full power for around 15 seconds then back to 65% power.</li> <li>• The areas we perform stalling exercises are in the training area only (over the coast, Belmore Swamp, and Collombatti Area).</li> </ul>
16	<p>A lack of information on the proposal has been provided by Kempsey Shire Council.</p> <p><b>Response</b>  N/A – This issue appears to be for Council to respond to.</p>
17	<p>The pilot training facility should not operate on weekends or night.</p>

	<p>Due to the nature of the regulations for both CASA and the nations of the airlines that the college conducts flight training for, there is a set amount of night flying hours each student must perform.</p> <p>Some of this flying is away from the Airport, i.e., cross-country night navigation, and some of the night flying involves touch-and-go circuit operations at the Airport.</p> <p>AIAC must fulfil the contractual and regulatory night flying requirements for its students and customers. We do understand that night training in the circuit area will be noticeable (compared to what the level of airport usage is now), however the aircraft we operate have very low noise emissions as outlined in the Aircraft Noise Assessment.</p> <p>AIAC will work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights that can arrive and depart at any time (just like any other itinerant aircraft which is not operated by AIAC could do).</p>
18	<p>Night time flying training should be undertaken during wither when it gets dark around 5:30PM and there is ample time before 8pm to do the training.</p>
	<p><b>Response</b></p> <p>It is acknowledged that the incidence of night flying will be an increase over current levels, as there is very minimal night flying taking place at YKMP airport. AIAC projects that night flying (once our maximum student capacity is reached) will be 20% of our total flying activity. Night Flying will be scheduled according to the following seasonal hours: (DEC, JAN, FEB 19:30 – 23:30), (MAR, APR, MAY 17:00 – 23:30), (JUN, JUL, AUG 17:30 – 23:30), (SEP, OCT, NOV 18:00 – 23:30).</p> <p>Due to the nature of the regulations for both CASA and the nations of the airlines that the college conducts flight training for, there is a set amount of night flying hours each student must perform.</p> <p>Some of this flying is away from the Airport, i.e., cross-country night navigation, and some of the night flying involves touch-and-go circuit operations at the Airport.</p> <p>AIAC must fulfil the contractual and regulatory night flying requirements for its students and customers. We do understand that night training in the circuit area will be noticeable (compared to what the level of airport usage is now), however the aircraft we operate have very low noise emissions as outlined in the Aircraft Noise Assessment.</p> <p>AIAC will work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights that can arrive and depart at any time (just like any other itinerant aircraft which is not operated by AIAC could do).</p>
19	<p>The proposal of aircraft movements 18 hours a day, 365 days a year, 25,000 movements being one aircraft every 15 minutes is surely excessive.</p>
	<p><b>Response</b></p> <p>The college requires an open and flexible time window from 0600 hours to 0000 hours each day, every day of the year. This does not necessarily mean that we will be flying an aircraft every 15 minutes for 18 hours a day every day of the year. It is more likely that general flying activity would commence around 8am in the morning and finish around 5pm in the afternoon, sometimes earlier in the winter months, sometimes later in the summer months. There will be night flying scheduled in our training syllabus, which is around 20% of our total flying effort.</p> <p>The aircraft we operate are the most modern and have the lowest noise emissions of any light general aviation piston-engine training aircraft. They are significantly quieter than the older generation aircraft that other people currently fly within the Kempsey area.</p>

20	What guarantee is there that much larger aircraft will not be used in the future resulting in increased noise and emissions?
	<p><b>Response</b></p> <p>Our flight training business model is only for Commercial Pilot Licence (CPL) training and instrument rating training in light aircraft. All of our students who graduate conduct their Jet transition training in full motion flight simulators with their airline employer. AIAC is a flight training college and has no need to use large jet or turboprop aircraft.</p>
21	There should be some restrictions placed on the pilot training facility from Council in terms of flight numbers and times.
	<p><b>Response</b></p> <p>It should also be noted that Kempsey Airport is a Registered Aerodrome which does not have restrictions on aircraft movements, therefore the flight movements anticipated by AIAC are able to occur at the airport without any DA (or other) approval process. However AIAC is mindful that its operations will be a change from what residents who have chosen to live in proximity to a registered airport have become familiar with, as Kempsey Airport has, by best part, essentially been unused for several years. To this end, AIAC is committed to developing a noise management plan in conjunction with the Kempsey Shire Council that will consider residents who live in proximity to the airport.</p> <p>Due to the nature of the regulations for both CASA and the nations of the airlines that the college conducts flight training for, there is a set amount of night flying hours each student must perform.</p> <p>Some of this flying is away from the Airport, i.e., cross-country night navigation, and some of the night flying involves touch-and-go circuit operations at the Airport.</p> <p>AIAC must fulfil the contractual and regulatory night flying requirements for its students and customers. We do understand that night training in the circuit area will be noticeable (compared to what the level of airport usage is now), however the aircraft we operate have very low noise emissions as outlined in the Aircraft Noise Assessment.</p> <p>AIAC will work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights that can arrive and depart at any time (just like any other itinerant aircraft which is not operated by AIAC could do).</p> <p>The college requires an open and flexible time window from 0600 hours to 0000 hours each day, every day of the year. This does not necessarily mean that we will be flying an aircraft every 15 minutes for 18 hours a day every day of the year. It is more likely that general flying activity would commence around 8am in the morning and finish around 5pm in the afternoon, sometimes earlier in the winter months, sometimes later in the summer months. There will be night flying scheduled in our training syllabus, which is around 20% of our total flying effort.</p> <p>The aircraft we operate are the most modern and have the lowest noise emissions of any light general aviation piston-engine training aircraft. They are significantly quieter than the older generation aircraft that other people currently fly within the Kempsey area.</p> <p>It is also important to take in to consideration the impact of aircraft noise when purchasing a property that is located in proximity to an airport. The Australian Government website <a href="http://aircraftnoise.com.au/what-you-can-do/">http://aircraftnoise.com.au/what-you-can-do/</a> which details the things to consider if purchasing a property within proximity of an airport.</p>
22	No flights should occur between 9pm and 7am.
	<p><b>Response</b></p>



	<p>Our operation does require flexibility to operate up until midnight for circuit operations, in which we would cease circuit operations after that time. However, as the Airport is a public use airport, it would not be practical for AIAC to be subject to any constraint that would not enable a take-off or landing after midnight, or for that matter 24 hours of the day.</p> <p>AIAC does not intend to conduct night flying training after midnight, but there must be flexibility for our aircraft to be able to depart and arrive at any time, for example departing or returning on a cross-country flight to or from Kempsey Airport, that does not involve touch and go circuit operations. AIAC will however work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday), without limiting times for cross country night navigation flights that can arrive and depart at any time, just like any other itinerant aircraft could do at a public use airport.</p>
23	<p>We were not notified by Council about a meeting at the airport concerning aircraft noise or hours.</p> <p><b>Response</b> N/A – This issue appears to be for Council to respond to.</p>
24	<p>Breeding parrots valued at over \$100,000 will be negatively impacted by the increase in noise and will most likely cost me money due to reduced breeding which I will not be compensated for.</p> <p><b>Response</b> Studies that have been conducted on noise intrusion to avian behaviour do not necessarily support this issue raised. The results of the research we've reviewed indicate no difference in breeding success between noise affected birds and non-noise affected birds. Other studies have suggested that, when subject to noise, behavioural plasticity (adaption to environment) contributes to breeding resilience.</p> <p>See also:</p> <ul style="list-style-type: none"> <li>• Meillère, A., Brischoux, F., Angelier, F. (2015). <i>Impact of chronic noise exposure on antipredator behaviour: an experiment in breeding house sparrows.</i></li> <li>• Ortega, C.P. (2012). <i>Effects of noise pollution on birds: A brief review of our knowledge.</i></li> </ul>
25	<p>The proposed flying hours will destroy this peaceful area.</p> <p><b>Response</b> It is extremely improbable that the proposed flying activity will "destroy" the area. We empathise with the person who raised the issue due to there being a "change" from what people, who have chosen to reside in proximity to an airport, have become accustomed to, however we disagree.</p> <p>AIAC is mindful that its operations will be a change from what residents who have chosen to live in proximity to a registered airport have become familiar with, as Kempsey Airport has, by best part, essentially been unused for several years. To this end, AIAC is committed to developing a noise management plan in conjunction with the Kempsey Shire Council that will consider residents who live in proximity to the airport.</p>
26	<p>The proposed pilot training facility at Kempsey Airport will have significant impacts on local residents in the surrounding area – socially, economically, and environmentally.</p> <p><b>Response</b> AIAC has considered the impacts of our proposed operation at Kempsey Airport on the local Macleay Valley Community, which are outlined below:</p> <p><b>Social Impact:</b> Australia is, in principle, a multi-cultural nation. The majority of Australians have, for a significant time, welcomed people from other countries into our cities and communities. Since AIAC commenced training foreign pilots, people in</p>

Kempsey, Port Macquarie and surrounding areas have enjoyed the interaction of our students, who are generally in their early 20's. Our students have been welcomed into their community and even their homes for social events, meals and barbecues. Our company also regularly sends our employees to China and other countries to work and experience different cultures. During these journeys, our employees have all indicated that the time they spent abroad was a rich and rewarding cultural experience. We encourage our students to interact with locals and we encourage our employees to interact with our foreign students, in which some of our employees have built long lasting friendships with our students and stay in contact continuously. We believe this is a very positive aspect of our operation, and we fail to see any negative social impacts.

**Economic Impact:** There is a misconception based on assumption that any money spent by AIAC or our students will not remain in the local community. We hope to clarify this with the following information and facts:

- AIAC is a training service provider to a number of large foreign airlines. These airlines pay AIAC for our training services. None of the money we earn leaves Australia; in fact we bring in a significant amount of foreign capital to the local economy due to our operations. The income we receive from our course fees is used to purchase goods and services from the local communities we operate in, and employ locals and people from the local and other areas, such as flight instructors etc.
- The amount of money foreign students (and employment they) generate in communities where they learn is significant and positively beneficial for the local economy in where they learn. For example, education services ranks as the third to fourth largest export category earner for Australia following just behind iron ore, coal and gold (ABS, 2016; Deloitte Access Economics, 2009). Australia is the third most popular market for international students in the world. This market generates more than \$13.726 billion for the nation every year. China is the largest source country of international students to Australia (Department of Infrastructure and Transport, 2013; Quacquarelli Symonds, 2014). The market and the revenue it earns supports about 130,000 full-time equivalent (FTE) job positions Australia wide (Deloitte Access Economics, 2013).
- International students have a much larger economic footprint than just course fees and accommodation alone. They directly facilitate and generate significant spillover benefits including job creation, increased tourism and cultural assimilation and awareness. Deloitte Access Economics estimated that for every 10 international students enrolled, 2.9 FTE job positions are created. Interestingly, only a quarter of these positions were in the education and training sector, with the remainder dispersed throughout other industries in the community (Deloitte Access Economics, 2009). Each international student, including their friends and/or family visitors contributed an average of \$28,921.00 during 2009 and \$43,800.00 per student during 2011-2012, which demonstrates a positive growth effect for the Australian economy (Deloitte Access Economics, 2009, 2013). Each international student generates 0.29 in full-time equivalent workers. Overall, this sees international students, and the associated visitation from friends and family providing \$12.6 billion in value-added contributions. This is based upon student expenditure of \$13.7 billion and visiting friends and family expenditure of \$365.8 million. Education related tourists contribute more in expenditure than leisure travellers, who spend \$12.0 billion annually. In a 2007 study, it was suggested that for every two formal international students, one friend and relative visited Australia during the students' stay in Australia. AIAC can confirm this happens frequently with our Chinese students, with at least one visit a year from their parents (and more frequently from their partners). This category of traveller is estimated to contribute \$314.7 million to the Australian economy in value-added contributions. On average, the tourist visiting a studying relative spends between \$1,681 and \$2,000.00 per visit, with almost half of this being expended on food, drink and accommodation, and about a quarter on shopping items. A significant proportion of spending by the visitors of international students is in the retail trade, accommodation, cafes and restaurant

sectors of the economy. In addition, economic activity by international visiting relatives contributes an estimated 4,109 FTE employees. Of these, 1,525 are employed in the retail sector and 970 in the accommodation, cafes and restaurant sector (Deloitte Access Economics, 2013).

- International students have a significantly positive value-added economical impact on the community that they study at and live in. The money that students spend flows through local shops, and the retail sector, accommodation providers, travel services, and other community enterprises (DIICCS RTE, 2013). International students also contribute significantly to the Australian tourism industry. A 2010 study of 6,000 students showed that 85 percent had taken holiday travel and short weekend visits to local tourist attractions before, during and on completion of their studies (Davidson et al., 2010). Most of these trips were one to three days, with the average holiday spend less than \$1000.00 per trip. Given the points listed above, the data suggests that every dollar spent on education by an international student has the flow-on effect of \$1.90 in economy-wide value-added contributions, and with international student expenditure in Australia generating in the vicinity of 130,000 FTE positions in the Australian economy in 2007-08. Of the 130,000 FTE positions, approximately 33,482 are employed in the education sector, this implies that for every person employed in the education sector, a total of 3.65 are employed economy wide (Deloitte Access Economics, 2009).

Based upon the data provided above, the economic contribution that AIAC generates, and will generate in the future to the Macleay Valley Community is as follows. *NOTE: We have based this on our current cohort of Chinese students who are already living and residing in the township of Kempsey. This is not considering the large numbers of students we propose to bring into the local community at Kempsey as we expand.*

#### *Current cohort of 49 cadets*

- Full Time Equivalent positions (non-education sector) in Kempsey:  $49 \times 0.29 = 14.21$  FTE positions. (jobs in the community)
- Every 1 person employed at AIAC equates to 3.65 FTE in the community: currently  $8 \times 3.65 = 29.2$  FTE positions. (based on current 8 AIAC employees working at Kempsey airport) This number will increase significantly in the future to between 50-60 employees.
- Average discretionary spending by cadets (per student) in community for duration of training:  $49 \times \$36,360.50 = \$1,781,664.50$  (this is their general living expenses such as food, entertainment etc, all their own funds spent with local retailers and service providers).

There has been speculation that our operation will not contribute in any way economically to the local Kempsey community. This is simply not true. All of our students live in Kempsey in houses that AIAC leases from local people and real estate agents (*five properties at present, and increasing*), our students shop in the community and use a number of community resources.

**Environmental Impact:** The engines that AIAC's aircraft operate are Austro E4-A engines with 123Kw of power. These engines meet not only the Australian standards (under the *Aircraft Engine Emissions Regulations (Cth)*) but also the European Union (EU) emissions standards, which are considered the international standard. EU Directive 97/68/EC specifies that the emissions must not exceed:

- Carbon Monoxide: 3.5 grams /KWh
- Hydrocarbons: 0.19 grams /KWh
- Nitrogen Oxides: 0.4 grams /KWh
- Particulate Matter: 0.025 grams /KWh

	<p>When compared to a typical bushfire, which occur with high frequency in the Macleay Valley, through back-burning and natural causes, in which daily emissions can be in excess of 5 tonnes per day, (<i>Carbon Monoxide, Alkanes, Alkenes, Aldehydes, Organic Acids, Nitrogen Compounds, Sulphur Compounds, Particulate Matter, Carbon</i>) the emissions from AIAC training fleet are negligible, which could be around (based on maximum emission standards) 507.5 grams of emission per aircraft, per hour.</p> <p>If, for example, AIAC operated its maximum projected fleet of 20 aircraft for a continual 8 hours a day, the maximum emission would possibly be around 81kg a day. This would be based on AIAC operating 20 aircraft at full power for 8 continuous hours (which will not be the case).</p> <p>Refer to attached:</p> <ul style="list-style-type: none"> <li>• Langman, B., Duncan, B., Textor, C., Trentmann, J., &amp; van der Werf, G.R. (2008). <i>Vegetation fire emissions and their impact on air pollution and climate</i>.</li> <li>• Meyer, C.P., Luhar, A.K., &amp; Mitchell, R.M. (2007). <i>Biomass burning emissions over northern Australia constrained by aerosol measurements: I—Modelling the distribution of hourly emissions</i>.</li> <li>• <a href="https://www.dieselnet.com/standards/eu/nonroad.php">https://www.dieselnet.com/standards/eu/nonroad.php</a></li> </ul> <p>References for economic benefits data:</p> <ul style="list-style-type: none"> <li>• ABS. (2016). <i>International Trade in Services by Country, by State and by Detailed Services Category, Financial Year 2014-15</i>: Department of Foreign Affairs and Trade.</li> <li>• Davidson, M., Wilkins, H., King, B., Hobson, P., Craig-Smith, P., &amp; Gardiner, S. (2010). International education visitation - Tourism opportunities. <i>Sustainable Tourism Cooperative Research Centre, Griffith University</i>.</li> <li>• Deloitte Access Economics. (2009). The Australian education sector and the economic contribution of students.</li> <li>• Deloitte Access Economics. (2013). The economic contribution of international students.</li> <li>• Department of Infrastructure and Transport. (2013). State of Australian Cities Report.</li> <li>• DIICCSRTE. (2013). <i>Australia - educating globally, Advice from the International Education Advisory Council</i>: Department of Industry, Innovation, Climate, Change, Science, Research and Tertiary Education.</li> <li>• Quacquarelli Symonds. (2014). Trends in International Student Mobility.</li> </ul>
27	<p>Further consultation should be undertaken before further decisions are made.</p> <p>Response N/A – This is an item for Council to answer.</p>
28	<p>The current proposal does not allow for recommended minimum number of sleep hours per night (7-9 hours) as identified by the Sleep Health Foundation as there is currently practically no ambient background noise at night in this area. Most animals (wildlife/livestock) are asleep and general rural activities (tractors, chainsaws etc.) have ceased.</p>

	<p><b>Response</b></p> <p>AIAC is mindful that our proposed operation will change what people who have chosen to live in proximity of an airport are used to, which has previously seen very little use of the airport. We acknowledge that aircraft noise can be a concern for people who have chosen to live in proximity to an airport. It is true that the noise emissions generated by large transport category aircraft can have a negative affect on those person's well-being and health. There is an abundance of literature to support this. However, AIAC <u>does not</u> operate heavy transport category aircraft. The aircraft we operate are the most modern and have the lowest noise emissions of any light general aviation piston-engine training aircraft utilised in Australia. They are significantly quieter than the older generation aircraft that other people fly in the Macleay area and therefore will be a lot quieter than people are most probably expecting.</p> <p>Some research suggests that there is no significant difference or evidence that the presence of night-time aircraft noise affects people's life satisfaction, sense of worthwhile and happiness. It needs to be noted that these types of studies are conducted with residents living in proximity to major capital city airports or military bases. Some studies also suggest that the negative perception of aircraft noise is offset by the positive effects of airport operations such as local economical, social and tourism factors (refer to response to issue 26 for further information).</p> <p>References</p> <ul style="list-style-type: none"> <li>• Lawton, R.N., &amp; Fujiwara, D. (2015). <i>Living with aircraft noise: Airport proximity, aviation noise and subjective wellbeing in England</i>.</li> </ul>
29	What is proposed after 2018 – no details are provided in the reports on this.
	<p><b>Response</b></p> <p>The college intends to increase student numbers from 150 flying students to around 250 students in total. The anticipated 100 non-flying students will include cabin crew training and aircraft maintenance engineer training.</p>
30	Council should commission an independent noise report to be prepared in regards to the proposal.
	<p><b>Response</b></p> <p>The Aircraft Noise Assessment that was submitted is independent. It is at Council's discretion if they arrange another report. This does not concern AIAC, as we are confident in the validity and accuracy of the report submitted.</p>
31	Flights should be limited to between 7am and 7pm with no flights on Sundays.
	<p><b>Response</b></p> <p>During 2009, it was proposed by the Kempsey Council to start gradually withdrawing from operating the airport as it was not being utilised sufficiently and was imposing a burden on Macleay Valley ratepayers. The community objected strongly to this. AIAC entered into discussions with the local government on possible use of the airport and the possibility of building an international flying college. This has now progressed to the stage of AIAC utilising the airport on a user-pay basis in that we lease the terminal building, a site where we have portable classrooms located and pay landing and parking charges. AIAC's utilisation has significantly reduced the burden on ratepayers of what was, in principle, an unused public asset. The limitations that are mentioned above (i.e. restricted flying hours between 7am and 7pm) would not be acceptable to AIAC in that we have a set amount of flying to complete during a 12-month period. The limitation suggested above would not allow that, to a point where the college would not be able to operate at Kempsey Airport.</p> <p>AIAC is mindful that our proposed operation will be a change from what people who have chosen to live in proximity of an airport are used to. We also acknowledge that aircraft noise can be a concern for people who have chosen to live in proximity to an airport. It is true that the noise emissions generated by large transport category aircraft</p>

	<p>can have a negative affect on those person's well-being and health. There is an abundance of literature to support this. However, AIAC does not operate heavy transport category aircraft. The aircraft we operate are the most modern utilised in the Australian flight training industry and have the lowest noise emissions of any light general aviation piston-engine training aircraft. They are significantly quieter than the older generation aircraft that people who live in the vicinity and close proximity to Kempsey airport would be used to hearing.</p> <p>AIAC will work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday) without limiting times for cross country night navigation flights that can arrive and depart at any time, just like any itinerant aircraft could.</p>
32	<p>Concerned over conversion from a 50 year lease to freehold lease agreement.</p> <p><b>Response</b> Please refer to response 12 (above).</p>
33	<p>Council infrastructure in this locality is being put under pressure because of this development and increases at the nearby jail.</p> <p><b>Response</b> During 2016, AIAC has utilised one (1) shuttlebus to transport students who we have residing in Kempsey to and from the airport. The flight instructor staff who operate at the aircraft sometimes carpool. The maximum amount of vehicles that have resulted in our operations during 2016 has generally been five vehicles per day, including the shuttlebus.</p> <p>A detailed Traffic Study was undertaken as part of the development application process, which has found that AIAC's development will have a low impact on local road networks. Furthermore, AIAC will be installing new infrastructure (wholly within the Airport) in order for its school to operate, which will place no burden on Council infrastructure.</p>
34	<p>Why does this facility have to be located at Kempsey Airport and not Port Macquarie Airport.</p> <p><b>Response</b> AIAC already operates at Port Macquarie airport and we are looking at expanding our flying operations as the company grows. During 2011, the Federal Government, Kempsey Shire Council, Port Macquarie Hastings Council and Greater Taree City Council developed the Mid North Coast Regional Aviation Plan, which identified Kempsey Airport as an airport to support general aviation growth in the area. By moving some of its operations to Kempsey, AIAC has now commenced using what was a largely unused and dormant public asset which was placing a considerable cost burden on the Macleay Valley ratepayers to continue it running as a registered airport.</p>
35	<p>The AIAC is trying to gain total control of the airspace.</p> <p><b>Response</b> The college has no intention of gaining control of any airspace. We are utilising public airspace and an airport that is largely unused. AIAC's operations do not interfere or restrict any other local Kempsey Airspace users, Air Ambulance, Aeromedical, Firefighting or other flights. Just as we do not interfere with other airspace users and stakeholders at Port Macquarie airport, in which the college operates up to 18 training aircraft efficiently, and safely, in conjunction with up to 16 scheduled airline services a day between QantasLink, Virgin Australia and JetGo.</p> <p>In addition to our flight movements and the commercial flight movements at Port Macquarie Airport, there are up to 30 other privately owned aircraft at Port Macquarie that frequently use the airspace, plus 5-6 Air Ambulance Flights, 4-5 Aeromedical transfer flights, 3-4 helicopters a day, and flight training aircraft from Sydney based colleges, Hunter Valley based colleges, and a Coffs Harbour based college.</p>

	AIAC is a responsible airspace user and always considers and facilitates all other airspace users and stakeholders. We have been doing this for over 20 years at Port Macquarie Airport and it will be no different at Kempsey Airport.
36	The surrounding neighbourhood should be afforded some respite from the incessant circuit training through reduced operating hours of, for example, 9am to 10pm Monday to Friday, and 9am to 5pm Saturday and Sunday.
	<b>Response</b> Please refer to response 31.
37	The development should result in a reasonable return for Council and the ratepayers through continued lease of land at the airport, not conversion to freehold.
	<b>Response</b> During 2009 it was proposed by the Kempsey Council to start withdrawing from airport operations as it was not being utilised sufficiently and was imposing a burden on Macleay Valley ratepayers. The community objected strongly to this. AIAC entered into discussions with the local government on possible use of the airport and the possibility of building an international flying college. This has now progressed to the stage of AIAC utilising the airport on a user-pay basis, in that we lease the terminal building, a site where we have portable classrooms located and pay landing and parking charges. AIAC's utilisation has significantly reduced the burden on ratepayers of what was, in principle, an unused public asset. In relation to comments regarding freehold, please refer to response 12 (above).
38	Current noise levels from planes result in health impacts (such as headaches). The proposed increase in flights will significantly magnify this issue. The current 'ambient rural noise' does not dissipate this issue.
	<b>Response</b> All individuals react differently to different levels of aircraft noise exposure, and guidelines are usually applicable to the general population. The World Health Organisation's (WHO) <i>Guidelines for Community Noise</i> and <i>Night Noise Guidelines for Europe</i> presents guideline values/noise limits for each specific environment and health effects associated with certain levels of noise. For an outdoor living area, long-term average noise levels of 50-55 dB LAeq can produce moderate to high daytime and evening annoyance to the noise, however adverse impacts have not been observed for LAeq noise levels below 40 dB(A). The LAeq contours presented in the report show the 24-hour averaged 30 and 40 dB(A) contours, with any sensitive receivers being only exposed to the 30 dB(A) contour. This level of exposure is well below the 50 dB LAeq level as outlined by the WHO.  It is true that persons who have chosen to reside in proximity to airports that operate heavy, transport category aircraft can experience adverse health effects. There is very little evidence to support that light aircraft use, especially low noise emission aircraft such as the types that AIAC utilise, cause adverse health effects in persons who have chosen to reside in the vicinity of an airport. What the literature does state that noise tolerance is largely subjective and variable between individuals and that individuals who have chosen to reside in the vicinity of an airport are more tolerant to noise once they have gained information about noise management procedures. It must also be noted, that these studies have been conducted in acutely noise affected areas around major international airports. AIAC does not operate aircraft of that category.  The aircraft we operate are the most modern and have the lowest noise emissions of any light general aviation piston-engine training aircraft operated in Australia. They are significantly quieter than older generation aircraft. AIAC will, however, work with Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday) without limiting times for cross country night navigation flights that can arrive and depart at any time, just like any itinerant aircraft could.  See also:

	<ul style="list-style-type: none"> <li>Kroesen, M., Molin, J.E.E., van Wee, B. (2010). <i>Policy, personal dispositions and the evaluation of aircraft noise</i>.</li> <li>Phun, V.K., Hirata, T., &amp; Yai, T. (2015). <i>Effects of noise information provision on aircraft noise tolerability: Results from an experimental study</i>.</li> </ul>
39	<p>The AIAC does not abide by current consent conditions and was operating until 11:30PM recently. What guarantee is there they will abide by any new conditions of consent if this DA is approved.</p> <p><b>Response</b>  Without knowing the specific date of the above-mentioned flight it is difficult to provide an answer. However it is highly unlikely to be an AIAC aeroplane as we have just only recommenced flying operations at Kempsey airport for 2017 on the 8<sup>th</sup> March. We are finding that social media being generated by a group of individuals who are opposing our proposed development are blaming our college for any noise generated at any time of the day at Kempsey Airport, by any aircraft. Unfortunately, we believe that this has developed into an attitude of 'guiltily by association" towards AIAC and its employees.</p> <p>AIAC is a highly conformant operator and we will continue to operate in this manner in future.</p>
40	<p>Council should run open forums of communication before decisions are made.</p> <p><b>Response</b>  We believe the Council has complied with its responsibilities within the local government regulations and rules, however this item is for Council to address directly.</p>
41	<p>What will be the financial benefit to Council be of this development?</p> <p><b>Response</b>  Council will gain from leases and possible proceeds for conversion to freehold. The Council throughout our long-term discussions has been completely altruistic towards the benefits of AIAC's proposed operation for the Macleay Valley Community. Refer to issue number 26 for an outline of the economic benefits.</p>
42	<p>Will affected dwellings be fitted with double glazed windows or air conditioning as they do with highway upgrades that impact residents.</p> <p><b>Response</b>  No. AIAC will not be offering this as our studies have all found that this is unnecessary, considering the low noise emissions of the aircraft that AIAC operate.</p>
43	<p>People have purchased properties near the airport knowing that the airport has not operated on a commercial basis for many years.</p> <p><b>Response</b>  We are mindful that our operation will be a change from what residents who have chosen to live in proximity to an airport have become familiar with, as the airport has, for the most part, essentially been unused. We will develop a noise management plan in conjunction with the Kempsey Shire Council that will consider residents who have chosen to live in proximity to the airport.</p> <p>It is also important to take in to consideration the impact of aircraft noise when purchasing a property that is located in proximity to an airport. The Australian Government website <a href="http://aircraftnoise.com.au/what-you-can-do/">http://aircraftnoise.com.au/what-you-can-do/</a> which details the things to consider if purchasing a property within proximity of an airport.</p>
44	<p>The flying school traffic would be more than that of a commercial airline using the airport.</p> <p><b>Response</b></p>



	<p>AIAC agree that, even when there was scheduled commercial services operating into and out of Kempsey, the maximum commercial traffic was around 2-3 flights a day (Impulse Airlines).</p> <p>It is important to note, however, that AIAC's operations do not interfere or restrict any other local Kempsey Airspace users, including Air Ambulance, Aeromedical, Firefighting or other flights.</p> <p>Just as we do not interfere with other airspace users and stakeholders at Port Macquarie airport, in which the college operates up to 18 training aircraft efficiently, and safely, in conjunction with up to 16 scheduled airline services a day between QantasLink, Virgin Australia and JetGo.</p> <p>In addition to our flight movements and the commercial flight movements at Port Macquarie Airport, there are up to 30 other privately owned aircraft at Port Macquarie that frequently use the airspace, plus 5-6 Air Ambulance Flights, 4-5 Aeromedical transfer flights, 3-4 helicopters a day, and flight training aircraft from Sydney based colleges, Hunter Valley based colleges, and a Coffs Harbour based college.</p> <p>AIAC is a responsible airspace user and always considers and facilitates all other airspace users and stakeholders. We have been doing this for over 20 years at Port Macquarie airport without any accidents or serious incidents.</p>
45	<p>The community has a right to know the particulars of the MOU.</p> <p><b>Response</b> The MOU is commercial-in-confidence between the Kempsey Council and AIAC.</p>
46	<p>Object to being referred to as a 'receiver' in the GHD report.</p> <p><b>Response</b> This is standard terminology used in technical acoustic (noise) reports. However, we apologise on behalf of the consultant for not explaining this in the document.</p>
47	<p>The report by McNeil Architects states that any aircraft noise "will most likely be masked by ambient background noise". This is not good enough; they should have to demonstrate that it definitely will be masked by background noise.</p> <p><b>Response</b> There are no regulations in Australia which states that aircraft noise needs to be masked by background noise. From direct experience in background noise monitoring in rural areas, typical long-term average background noise levels vary between 30 and 35 dB(A) <math>L_{Aeq}</math>. Based on the results shown in the Aircraft Noise Assessment report, sensitive receivers in the vicinity of the aerodrome will be exposed to 24-hour averaged noise levels of approximately 30 dB(A) <math>L_{Aeq}</math>, which are comparable to or even lower than background ambient noise levels in rural areas as mentioned above.</p> <p>Even though not applicable in this case, for comparative purposes, the NSW <i>Industrial Noise Policy</i> Amenity Criteria uses a 50 dB(A) <math>L_{Aeq}</math> recommended acceptable noise level from industrial noise sources in rural areas.</p>
48	<p>Why are European guidelines for night noise being quoted for a airport in rural Australia?</p> <p><b>Response</b> Australia has no guidelines or criteria for aircraft noise exposure for the <math>L_{Aeq}</math> metric. Therefore, aircraft noise guidelines and information about health impacts associated with aircraft noise have to be sourced elsewhere. We have referenced both the Australian Government Department of Transport and Regional Services Discussion Paper <i>Expanding Ways to Describe and Assess Aircraft Noise</i> as well as the World Health Organisation (WHO) paper <i>Night Noise Guidelines for Europe</i>, which is part of the wider paper <i>Guidelines for Community Noise</i>.</p>
49	<p>As the pilots are trainees there is a potential safety issue.</p> <p><b>Response</b></p>

	<p>AIAC has been training pilot trainees at Port Macquarie airport for over 20 years. Port Macquarie airport is located in a medium density urban environment and with a high number of air traffic movements on a day to day basis, in which the college operates up to 18 training aircraft efficiently and safely in conjunction with up to 16 scheduled airline services a day between QantasLink, Virgin Australia and JetGo. In addition to these services, there are up to 30 other privately owned aircraft at Port Macquarie that frequently use the airspace, 5-6 Air Ambulance Flights, 4-5 Aeromedical transfer flights, 3-4 helicopters a day, and flight training aircraft from Sydney based colleges, Hunter Valley based colleges, and a Coffs Harbour based college. AIAC has always managed risk to effectively and this is evident in our total of 25 years of operating history of not being involved in any accidents or serious incidents. AIAC will continue to manage risk to the high level of effectiveness at Kempsey as we do at Port Macquarie.</p>
50	<p>An explanation (in plain English) should be given of how the data of 'perceived noise' versus 'ambient rural noise' was collected and a comparison made.</p>
	<p><b>Response</b> From direct experience in background noise monitoring in rural areas, typical background noise levels averaged over a long-term period vary between 30 and 35 dB(A) <math>L_{Aeq}</math>. Based on the results shown in the report, sensitive receivers in the vicinity of the aerodrome will be exposed to 24-hour averaged noise levels of approximately 30 dB(A) <math>L_{Aeq}</math>, which are comparable to background ambient noise levels in rural areas as explained above.</p>
51	<p>No actual collection of data has been made at our end of the runway that we are aware of and we are probably the closest residence.</p>
	<p><b>Response</b> No collection of noise has been conducted due to the nature of the low noise emissions generated from AIAC light training aircraft. Government and International guidelines allow noise modelling to be performed for this type of proposed operation. There is a large volume of noise data and modelling capability that ensures the validity of the acoustic modelling.</p>
52	<p>Have the cumulative impacts of this proposal and the expansion of the Gaol on council's roads and other infrastructure been considered.</p>
	<p><b>Response</b> Yes, these impacts have been considered in a water and hydraulics report and traffic report. The traffic report has indicated that the proposed operation will have minimal impact, the hydraulics and waste water report has indicated AIAC will need to invest in water and reticulation technology at the Airport, which will have no impact on existing infrastructure.</p>
53	<p>We request an extension to the closing date for submissions on this DA</p>
	<p><b>Response</b> We believe Council has further consulted with the community, however this item is for Council to respond.</p>
54	<p>The SoEE claims that the planes will be more fuel efficient than the average 4wd when operating at 30% power. I suspect when the planes are taking off and landing they will be operating at much more than 30% power and therefore have much higher emissions than the average 4wd vehicle.</p>
	<p><b>Response</b> During take-off the aircraft we operate will use 100% power for approximately 60-90 seconds, then reduce to 92% power for climb (if conducting circuits and climbing to 1000 feet above ground level) for a further 60-70 seconds (if climbing for a departure to another airport or training area, 92% power will be used for longer). If conducting a circuit, the power used at 1000 feet AGL will be 50% for approximately 150 seconds, during approach and landing, the power is reduced from 50% to 30% to 15% for approximately 120 seconds. Please refer also to response 8 for further information on emissions.</p>

55	<p>The proposed bus movements will result in significant wear and tear on local rural roads.</p> <p><b>Response</b></p> <p>An independent traffic assessment has been provided to Council which has demonstrated that traffic movements will have minimal impact on the local road network. AIAC will also comply with any reasonable conditions that are outlined in the development application.</p>
56	<p>A significant proportion of the economic benefit from each student will go directly back to AIAC, not the Kempsey community.</p> <p><b>Response</b></p> <p>At present, AIAC has 49 cadets residing in Kempsey, in houses that AIAC leases from Kempsey property holders and agents. The students utilise all local services and retailers for shopping, provisions and recreation. Please refer to response 26 regarding the economic benefits that will directly contribute to the local Kempsey economy.</p>
57	<p>Would the proposed increase in use of the airport affect the ability for the air ambulance to access the runway when required.</p> <p><b>Response</b></p> <p>AIAC also operates up to 18 aircraft at Port Macquarie airport, along with up to 16 scheduled airlines services a day between QantasLink, Virgin Australia and JetGo. In addition to these services, there are up to 30 other privately owned aircraft at Port Macquarie that frequently use the airspace, 5-6 Air Ambulance Flights, 4-5 Aeromedical transfer flights, 3-4 helicopters a day, and flight training aircraft from Sydney based colleges, Hunter Valley based colleges, and a Coffs Harbour based college. Port Macquarie airport is one of the busiest regional airports on the east coast of Australia, which does not have Air Traffic Control services. All of this traffic co-ordinates efficiently and safely with Air Ambulance traffic as well as all other traffic. AIAC's operations will not affect the ability for the NSW Air Ambulance to access Kempsey Airport.</p>
58	<p>The television cannot be heard currently when flights pass over our dwelling and therefore we do not agree that the ambient rural background noise will mask the increase in aircraft noise.</p> <p><b>Response</b></p> <p>Individual home circumstances vary from dwelling to dwelling, with results and observations usually being applicable to the general population. Although we cannot comment on this case individually, we can say that the Aircraft Noise Assessment states that an internal noise level of 60 dB(A) is the sound pressure level of a noise event that is likely to interfere with conversation or with listening to the radio or television. Dwellings located within the 60 dB(A) maximum noise level contour are not likely to experience noise levels likely to interfere with normal conversation due to the 10 dB(A) attenuation provided by the fabric of the dwelling. It is also important to note that each aircraft flyover will produce slightly different noise levels due to the variation of pilot experience and how they configure the aircraft at certain stages of flight.</p> <p>24-hour averaged noise levels experienced from the source will be in the vicinity of 30 dB(A) <math>L_{Aeq}</math>, which, as the Noise Assessment observes, is comparable to ambient rural background noise.</p>
59	<p>The scenarios outlined in the noise report do not reflect current operations, for example replication of loss of power mid-air restarting the plane, returning to the runway immediately after take-off, emergency altitude recovery (resulting in full throttle used).</p> <p><b>Response</b></p> <p>We do not perform the types of operation that are described. For example, AIAC does not shut an engine down in flight in a single-engine aircraft, therefore we do not perform a 'mid-air restart', nor do we perform any manoeuvre where we return to the runway immediately after take-off using full throttle. The only manoeuvres that would be similar to those described is a rejected take-off where we perform a normal take-off roll (at full power) and then reject the take-off by closing the power lever to idle and stopping on the remaining runway. The other manoeuvre that may be similar to what has been described is a routine manoeuvre called a 'go-around' where the landing is discontinued and full</p>

	power used to climb straight ahead along the runway centreline and overhead the runway. This is within the 70 dBA, LAmox noise area that does not affect any nearby residents and is permissible practice under the CASA regulations.
60	The AIAC should consider reallocating the distribution of the use of each runway taking into account impacts to residents, not only the shortest taxi length.
	<p><b>Response</b></p> <p>AIAC does not use shortest taxi length to determine runway use. Wind direction and wind velocity is the determinant for which runway to take-off or land on, with runway take-off and landing always being conducted on the most into-wind runway. This is the safest method to use to take off and land to ensure aircraft take-off and climb performance.</p>
61	Noise affected property acquisition should be considered by AIAC.
	<p><b>Response</b></p> <p>AIAC would only consider purchasing property at current market prices to meet our growth needs, on an as-needs basis, for example to construct accommodation.</p>
62	The economic benefits to the Kempsey community have been exaggerated given the students will most likely live in Port Macquarie and be bussed around at specific times with little or no spending money.
	<p><b>Response</b></p> <p>This is incorrect. AIAC presently has 49 students exclusively residing in Kempsey township in houses that we lease from local property holders (5 properties). In addition to this our students exclusively spend money for living, entertainment and other services with Kempsey based retailers and service providers.</p> <p>Refer to response 26 for a detailed description of the factual and accurate economic benefits our operation provides to the Kempsey community, which will only exponentially increase as our student numbers grow.</p>
63	Will there be additional emergency services available given the risk of accidents, as these pilots will be training.
	<p><b>Response</b></p> <p>Under current airport provision of emergency services legislation, there is no need to increase emergency services above what is already available in the Kempsey community. This can be considered when comparing operations at Port Macquarie airport, which currently has a large volume of flight training (student pilots) and up to 16 scheduled airline flights a day, as well as a considerable amount of recreational, and other commercial traffic using the airspace that is located in a medium density and populated urban environment. There are no additional emergency services at Port Macquarie airport which has a large number of fare-paying public passengers flying to and from the airport every day.</p>
64	The noise is not "perceived" as claimed in the McNeill architects report, it is real. The current restrictions on hours of operation should remain to protect the amenity of the surrounding community.
	<p><b>Response</b></p> <p>The current restrictions on the portable building DA at the Airport are untenable commercially and if they did remain AIAC would not be able to operate commercially at Kempsey airport. This would result in a lost opportunity for economic and cultural growth for the greater Kempsey community and local businesses.</p> <p>AIAC will however work with the Kempsey Council to develop a Noise Management Plan and Fly Neighbourly Agreement to limit circuit operations to a specified time (adjusted seasonally and by weekday) without limiting times for cross country night navigation flights that can arrive and depart at any time, just like any itinerant aircraft could.</p>

65	<p>Why does the noise report only refer to "townships"? There are residents in the vicinity of the airport that are rural/rural residential areas and the impacts to these people should be assessed to.</p>
	<p><b>Response</b></p> <p>Noise levels have been modelled based on land contours around the Airport and the Aircraft Noise Assessment contour maps highlight the expected dBA level for rural/residential areas around the Airport. Noise measurements at each individual dwelling have not been undertaken due to the nature of the low noise emissions generated from AIAC light training aircraft. Government and International guidelines allow noise modelling to be performed for this type of proposed operation. There is a large volume of noise data and modelling capability that ensures the validity of the acoustic modelling.</p>
66	<p>The existing drainage from the airport onto private property is inadequate and causing erosion issues. The increase in development will exacerbate this problem.</p>
	<p><b>Response</b></p> <p>This item is for Council to respond to, as the stormwater infrastructure at the Airport was installed by others. We do note, however, that any augmentation to the stormwater system required as part of the development will be in accordance with Australian Standards and government regulations.</p>