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Department of Planning Received 1 DEC 2016 Scanning Room

Trinity Point Mixed Use Development
Proposed Helipad Modification to Concept Plan
Reference MP 06_0309 MOD 3
Objection

BACKGROUND

When we bought a block of land in Morisset Park in 2004 to build our retirement home, we did so because of the quiet, semi-rural nature of the area. We chose the south west side of the lake over other areas which we considered to be either heavily developed, commercially or industrially oriented or a combination of all three.

Since then the Johnson Property Group has devised preposterous schemes to develop the former St John of God site at Barden's Bay.

First there was the proposal to squeeze some 202 residential blocks into part of the site bounded by Henry, Lakeview and Morisset Park roads. These have now been graced with look-alike boxes of houses with restricted roadways and parking and no greenspace at all.

Then there was the Master Plan of 2005 for the Tourism Zone which included a 60m jetty, conference/restaurant facilities and a large open area adjacent to the lake with walkways, tennis courts and playground facilities plus tourist accommodation, supported by an extensive EIS. This was generally agreed to by the community and accepted by council as an appropriate development for the site.

In 2008 JPG decided that this was not good enough and submitted an outrageous proposal (the Concept Plan) to replace the Master Plan with a 308 berth marina (including boat repair, hardstand and travellift facilities), a floating heliport, conference centre/restaurant, and 150 apartments. Some of these buildings were to be 7 stories high. Very little visitor parking was provided for.

As this obviously represented an environmental, ecological and visual disaster as well as a gross disruption to the amenity of existing residents, the JPG then prepared an amended plan - the "Preferred Project Report" in the wake of protests by local residents and council. This included provision of a smaller marina of 188 berths, no marine maintenance facilities and a reduction in casual accommodation to 75 units and a similar number of residential apartments.

CURRENT POSITION

The Johnston Property Group has now submitted a further modification to include a helipad within the development.

Justification

First we heard that helicopter would be required to transport Emirates off-duty aircrew.

Next JPG claimed that a heliport is essential as 'The F3 [M1] motorway could not always be relied upon because of accidents causing roadblocks'.

Then there was the ludicrous claim that a helicopter was required for 3 flights per day each carrying 6 passengers (i.e., 18 people) could be considered as 'major tourism' and could therefore be approved under the old Part 3A of the Act.

At a recent 'Information Day' when I asked Brian Garland how the community would benefit from a helipad he replied "It would create local jobs".

Now JPG are asserting that the provision of a helipad is an essential requirement of the investors.

OBJECTIONS

We have no problems with development as such, so long as it is sympathetic to the environment and compatible with the wishes of the local community.

However we object to the proposal on the following grounds:

Safety

Helicopters are inherently unstable - the Civil Aviation Safety Bureau reports that even though they account for only 13 per cent of the Australian civil fleet, helicopters were involved in about 36 per cent of all accidents in general aviation in the last 10 years—and 47 per cent of all fatal accidents.



With the weight of engine(s), gearbox and rotor over the cabin, they are extremely top-heavy and an accident, mechanical failure or pilot error can immediately flip them upside down. This can be disastrous if they hit the water. Royal Australian Navy crews are trained in a special tank which inverts the cabin and dunks them underwater when they apply their training to unfasten their harnesses and headsets and quickly find their way through the exit to the surface.



It is doubtful that civilian pilots receive this sort of training. As a result many pilots simply refuse to land on a water based helipad. It would be unrealistic to expect passengers to be shown these procedures in a 5 minute safety demonstration. The existence of yacht masts would be an unacceptable hazard for pilots.

Downwash effects

Helicopters of the proposed size produce a downwash of around 30 knots (60 kmh), which spreads to approximately 30 metres and remains significant to 85 metres. Any sailing or small craft under the flight path would be severely affected.



Helicopter flight rules require that they complete a circuit of the landing area of around $1^{1}/_{2}$ kilometres to determine wind direction and a clear approach path. As they need to fly into the wind on both take-off and landing, residents of several suburbs in the flight-path at the lower altitude of these manoeuvres would also be affected.

Emergency services

JPG proposes to locate the helipad on a floating pontoon as an alternate to a land based facility as they suggest such would be 'subject to bushfires or floods'!

And yet not so long ago a Westpac Rescue helicopter managed to land on the shore, where it was only some 20 metres away from the ambulance which brought the stricken patient. A heliport in the middle of Barden's Bay at the end of a narrow floating breakwater would not be a practicable arrangement for patient transfers as the ambulance could not access the breakwater.

Noise

Last March JPG organised a monitored noise test around parts of the peninsula. However they employed a small single engined 'Squirrel' machine which was not fully loaded in accordance with the Australian Standard. No full power ascents or landings were carried out and in any case a much larger machine would be required to be economically viable. Results from this test would therefore be of limited value. It has been found that Helicopter operations may generate noise levels in excess of 100db.

The Oregon Museum of Science and Industry published these decibel examples in 2005:

rustling leaves	20
quiet rural area	30
conversation at home	50
average factory, freight train	80
Busy urban street, diesel truck	90
outboard motor, motorcycle, jackhammer	100
Thunderclap, live rock music	120
Jet takeoff (100 m)	130
Jet takeoff (25 m)	150
	quiet rural area conversation at home average factory, freight train Busy urban street, diesel truck outboard motor, motorcycle, jackhammer Thunderclap, live rock music Jet takeoff (100 m)

Sounds from 0 to 60 can be described as quiet; from 60 to 70 as annoying; from 70 to 80 risking possible hearing damage; from 100 to 110 causing hearing damage; 120 is the human pain threshold; from 130 to 140 risk serious hearing damage and from 150 upwards cause eardrum rupture.

Pollution

Modern helicopters are powered by gas turbines which burn aviation grade kerosene. These fuels are complex mixtures of up to 260+ aliphatic and aromatic hydrocarbon compounds (C(6) -C(17+); possibly 2000+ isomeric forms), including varying concentrations of potential toxicants such as benzene, n-hexane, toluene, xylenes, trimethylpentane, methoxyethanol, naphthalenes (including polycyclic aromatic hydrocarbons [PAHs], and certain other C(9)-C(12) fractions (i.e., n-propylbenzene, trimethylbenzene isomers).

In studies of US Air Force Bases, they have shown to cause cardiovascular and respiratory diseases, while the UN's World Health Organization has found the resulting air pollution is a common cause of lung cancer.

Residents of the peninsula and particularly those living in the flight path can therefore expect to be subject to these fumes, especially at low altitude when they will be distributed by the rotor downwash.

Loss of social amenity

The residents of the Morisset Peninsula have set up their homes in the area to enjoy the attraction of a semi-rural area and the natural beauty of nearby bushland. They enjoy outdoor activities such as barbeques, cycling, bushwalking and games with their children. All these activities will be disrupted by up to 8 flights per day of the proposed helicopters.

Effects on Wildlife

The establishment of a helipad attached to the marina would have a severe impact on local bird life. The trees on the reserve have been observed as roosting sites and nesting sites for native birds, including white-bellied sea eagles which represent apex predators in the area. For some time, a dead tree on the foreshore has been observed as a favoured roosting place for a white-breasted sea eagle each year. This has already been removed by the developers. The following figure shows that bird and the now removed tree.



The intrusion of circling helicopters can only have a further detrimental effect on these birds. The collision of larger birds such as swans and pelicans with helicopters would not result in a good outcome for either.

COMMENT

Firstly, dealing with the purported justification for a helipad:

As Emirates Airlines are apparently no longer interested in the project, the need for off-duty transport no longer exists. In any case Morisset Park can hardly be compared with, say the Gold Coast or Las Vegas

Regarding the F3 [M1] objection – statistics at the time indicated a traffic volume of 78,000 vehicles per day and 241 accidents for the year. This represents one accident

per 118,000 trips – not good for those involved, but hardly a case of significant delays.

With respect to employment, Brian Garland didn't elaborate further on what the jobs would be, so we can only assume he would collect some unemployed people from Centrelink to man the security boats around the exclusion zone.

On the matter of investor requirements, this is a bit hard to swallow as the Seventh Day Adventist Superannuation Fund is investing 62% of the capital and it is difficult to how a religious organisation would wish to inflict such a proposal on the community.

RECOMMENDATION

It is recommended that this application be declined on the following grounds:

- Safety the provision of a floating helipad would involve unacceptable operational risks to flight crew, passengers and residents;
- Rotor downwash would seriously affect small craft such as kayaks, canoes, sailing boats and 'tinnies' and endanger the lives of participants as well as those on marina walkways;
- Pollution from jet fuel exhaust would have a detrimental affect on the health of residents and visitors;
- Noise levels from realistically sized helicopters would have a detrimental effect on hearing of residents and especially young children;
- The flights would result in unacceptable loss of social amenity;
- There would be further detrimental effects on local bird life;
- The helipad would be of dubious value for emergency evacuations;
- There would be a negligible affect on creating employment.
- The justifications offered in support of the helipad are flimsy at best and detrimental to the community and wildlife at worst. One must ask why a developer whose main objective is to sell properties also proposes helicopters circling above those same sites at up to 8 times per day?

Yours faithfully,

George Aungle

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