

Response to Sydney Airport Demand Management Discussion Paper

From: No Aircraft Noise Party

Introduction:

No Aircraft Noise Party was formed by residents of Sydney in 1995 in response to the lack of consultation on the introduction of the third runway at Sydney Airport and the unacceptable noise experience by residents of Sydney on the implementation of the concentrated flight paths with the third runway in November, 1994.

Legislation (Movement Cap, Curfew, Demand Management, Slot Management, Long Term Operating Plan and the Regional Ring Fence) were implemented to control Sydney Airport's operation to manage the impact of Sydney Airport's operations on Sydney residents and to protect access to Sydney Airport for regional flights for reasons of equity.

It is incredulous that the Department of Infrastructure, Transport, Regional Development and Communications has ruled the Curfew, Noise Sharing Arrangements and the Movement Cap out of scope, with these being the key elements of the controls on Sydney Airport operations to balance aviation with the rights of Sydney residents, so they are not subjected to unreasonable and dangerous levels of aircraft noise. To remove the reasons for the controls, the 80 movement per hour number and at the same time, include methods to expand the cap by increasing flights excluded from the cap measurement is palpably misleading.

Purpose of this response:

The purpose of this document is to respond to the Department of Infrastructure, Transport, Regional Development and Communications 2020 discussion paper on Sydney Airport Demand Management.

It will specifically respond to the questions of:

- A. How would changes to the definition of a regulated hour (i.e. removing the rolling hour) impact stakeholders?
- B. Should any flights be excluded from the movement cap, while still providing a net benefit to the community? What impacts would this have?
- C. What means of publication would satisfy public accountability and transparency with respect to both breaches and non-breaches?

Also, several inaccuracies in the discussion paper will be raised.

How would changes to the definition of a regulated hour (i.e. removing the rolling hour) impact stakeholders?

No Aircraft Noise objects to the change in the approach of measurement of the Movement Cap from the rolling hour to the actual hour because it may result in periods of extreme noise for those close to the airport, especially under the North South flight paths.

The Demand Management Act with slot management was designed to spread the aircraft movements evenly over the measurement period. The reason for this legislation design was to prevent Sydney residents experiencing large peaks and troughs in aircraft movements because the number of aircraft noise events are directly correlated to the level of annoyance caused by aircraft noise.

Sydney Airport is a very small airport by international standards. Consequently, the North South runways and flight paths have little separation between them, resulting in those residents close to the airport hearing planes from both North South flight paths simultaneously. At this proximity to the airport under a flight path, a plane landing is audible for about 60 seconds whilst, a plane taking off is still audible for several minutes after leaving Sydney Airport precinct.

Air Services and Sydney Airport are looking for flexibility to "catch up" after multiple flight delays but this proposal could result in residents having periods of doubling of flight movements for short periods of time. In this case, residents will have extremely noisy events simultaneously and continuously due to the overlapping noise footprints caused by closeness of the flight paths and the length of time the noise of a plane takes to move out of hearing range. e.g. It is possible, if Sydney Airport started clearing the backlog just before the end of the measurement hour and extended into the next measurement hour, it could double flight movements/noise events thus impacting residents with extreme noise for a significant period of time compared to the rolling hour measurement method.

No Aircraft Noise therefore, finds this proposal totally unacceptable due to the impact on Sydney residents.

Should any flights be excluded from the movement cap, while still providing a net benefit to the community? What impacts would this have?

I don't believe there are any net benefits for the Sydney residents in the proposal.

What is your definition of "community"? The definition of community should include Sydney residents only, as it is not equitable for legislation to pick winners and losers when Sydney residents bear all the noise downside and others (especially the aviation industry) have all the benefits.

To have flights not included in the movement cap will benefit airlines and Sydney Airport by enabling them to covertly increase the movement cap without changing the 80 aircraft movements per hour measurement. This is a totally unjust situation and proposal.

The proposal to exclude "quieter" planes is also extremely unjust. These planes are not notably quieter when measured by the human ear, as described in our original submission to Productivity

Commission on Aviation in 2019. Annoyance is correlation to noise events and level of perceived noise; hence, there is no justification in excluding these planes from the movement cap.

The discussion on page 13 on the curfew is inaccurate and not clear. Some facts:

- Curfew flights (Mode 1) require planes to take off to the south over Botany Bay.
- Limited types of planes (noise rated) with a limited number of flights during the curfew are allowed (a cap of 74 flights per week).
- At night, aircraft noise annoyance is also correlated to difference between the noise event and background noise which is low at that time. Hence the need for restricted flights because waking up large numbers of people has a significant impact on health - it is used as a form of torture and would be an effective way to reduce the productivity of all people under the curfew flight paths.

It is hard to believe that the proposal from the Department is to increase the cap by excluding noise rated aircraft and regional aircraft from flight movement cap. Surely, this is out of alignment with the purpose a cap designed to limit aviation impact on residents.

There are existing exemptions for excluding medical emergency, emergency flights and state aircraft from the movement cap. Including "quieter planes", regional planes and noise rated planes from the movement cap is totally unjustified and a blatant attempt to expand capacity beyond 80 movements per hour.

What means of publication would satisfy public accountability and transparency with respect to both breaches and non-breaches?

There should be no reduction of information required to measure and access public accountability and transparency for breaches and non-breaches of the movement cap. This information needs to be accessible to the public to enable us to hold government, government departments and Sydney Airport to account for failures and issues.

Inaccurate information in the discussion paper;

The discussion paper incorrectly indicates that emergency and state aircraft are included in the movement cap. This is not correct.

Division 5, Part 3, Section 29 to 32 lists the exemptions for emergency and state aircraft.

Summary:

No Aircraft Noise Party totally disagrees with the proposal outlined in this discussion paper because it is a blatant attempt to increase the flight movement cap and remove the existing protections implemented to balance the need for aviation with the rights of Sydney residents to live a reasonable life in Sydney without ever increasing aircraft noise without limits.

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