

The Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra NSW 2600

Wednesday 7th April, 2010

"Inquiry into the effectiveness of Airservices Australia's management of aircraft noise".

I sincerely thank The Senate Standing Committee for this opportunity to voice my concerns.

SUMMARY OF SUBMISSION by TERMS OF REFERENCE

(AA=Airservices Australia)

(a) has conducted an effective, open and informed public consultation strategy with communities affected by aircraft noise;

- Yeah, and then I woke up.
- Did I receive any information about RESA at Sydney Airport even though I'm 2kms away? No, that was the job of the "Sydney Airport Noise Set to Soar" article in the newspaper.
- Have I ever been contacted by Mr Dudley at AA and allowed to express my concerns? No?
- Has my frequent-flyer status with AA's Noise Complaints Unit resulted in anything other than glossy information packs that my taxes have paid for, telling me how wonderful they are? No.
- Has AA sought community feedback on what noise abatement measures might better serve the community, given the reality that traffic levels WILL increase, no matter what? Hmm..
- Do they publicly release information, even on their own website, in a timely manner, so the community can approach the SACF in time for the next meeting? Rarely.

(b) engages with industry and business stakeholders in an open, informed and reasonable way;

- If you're QANTAS, Jetstar or Sydney Airports Corporation Ltd. you have a better-than-even-chance.
- If you're the Sydney Airport Community Forum, you'll be listened to. It's important in order to formulate the next excuse on why you can't do what they ask.
- If you're a business stakeholder, as long as you can answer their question "What's in it for us" correctly, you have a chance.
- If you're a member of the public, 'please call our Noise Enquiry Unit. I'm busy calculating how much can be saved by working Air Traffic Controllers for 25 hours per day. There must be a way of doing this, I'm sure they do it in Kranskistan. Anyway, the new jets will be quieter and we'll get them running on only one of their 4m-tall low-noise engines. Just think of the fuel and greenhouse emission savings. Ticket prices will plummet! You'll barely be able to hear them. We wouldn't lie to you. We're Government-owned after all'.

(c) has adequate triggers for public consultation under legislation and whether procedures used by Airservices Australia are compliant with these requirements;

- What might they be?
- What are the mandated black-and-white empirically-measurable procedures we are talking about? Are LTOP requirements being met? Have they proactively come up with new methods to

reduce noise exposure and frequency of events in Sydney? (proactive doesn't mean a Ministerial Directive in my books). Do they always use the best noise-sharing runway mode, even if it means it may be more inconvenient for pilots and ATC?

- Has anything suggested by the public been implemented since LTOP, and it's inability to be realised?
- Does anything other than a major disaster with loss of life, trigger any sense of embarrassment or guilt at AA's corporate level?

(d) is accountable, as a government-owned corporation, for the conduct of its noise management strategy;

- Really... How? Maybe in theory but not in practice so far.
- Which Federal Minister For Transport has ever had any success in swaying AA to adopt practices that were agreed upon for LTOP, *after* LTOP commenced?
- If, even the person in power to coerce AA to achieve tangible outcomes, can be sidelined by the "dollars and employment provided" flaunted by the Aviation Industry, to whom is Airservices accountable?
- The current Federal Minister For Transport, Regional Services and Local Government was arguably perhaps, the most anti-aircraft-noise politician in recent history. Given how much he has pushed for a reduction in aircraft noise over his Grayndler electorate, what possible reason is there to believe that he would now act impartially, especially given the real statistics on jet noise distribution over Sydney has rarely been publicly highlighted to my knowledge. **I can live in hope that he is a fair man with very big 'convictions'.**
- "Sydney Departures this is Kranskistan 666. Beautiful view of the Botanical Gardens from up here". *"Kranskistan 666, that's Eastlakes Reserve you're flying over. I said right 030, not 300".* "Oops, I think the auto-pilot misunderstood me. I'll turn that way now. Kranskistan 666". *"Roger Kranskistan 666. Please be aware you've deviated from your flightpath. There may be repercussions".* "Sydney Departures, Kranskistan 666, if anyone asks, the crosswind caught me by surprise. Yeah, it's weather conditions". *"Kranskistan 666, Sydney Departures, maintain 3000 feet".* "Departures, Kranskistan 666, did you say 3000ft? This is DEPARTURES I'm talking to isn't it?". *"Kanskistan 666, Sydney Departures, affirmative. You forget you are in Sydney and not the United States. Maintain 3000ft sir. Good day".*

(e) has pursued and established equitable noise-sharing arrangements in meeting its responsibilities to provide air traffic services and to protect the environment from the effects associated with aircraft for which it is responsible;

- It has done nothing of the sort.
- Have any runway configuration modes or flight-paths ever been cycled, modified or dynamically changed as a result of community noise complaints? No sign of it.
- I would suggest that it has maintained the most desirable methods of operation to minimise Airspace and ground management complexities, and to maximise its own key performance indicators: traffic throughput, internal and to-client cost reduction and minimisation of flight delays. It has been complicit with Airlines in finding every way it can to avoid best-practice noise abatement and flight path procedures. This is clear from the SACF Inc's historical Senate Inquiry submission (sub129_SACF), and re-iterated by Dick Smith in his "Unsafe Skies" booklet. (Refs in my "Detailed Submission" below).
- It has avoided and discouraged suggestions for modifications to flight-paths by the SACF, Industry experts and the public, to keep in step with the ever-increasing community noise load by airports it services.
- It appears there is a proposal in the wings to permanently instigate a supposedly "temporary-for-RESA-only" runway configuration in Sydney.
- Anyone prepared to sift through and analyse the "jet-only" components of AA's Operational Statistics reports for the RESA period alone, will see the actual contempt being shown towards residents of the North East, City and Eastern Suburbs of Sydney.
- Everything is conveniently diluted in their "Runway End Impact" graphs (the showcase for LTOP performance) and probably include gliders, bats and those pesky, noisy crows in their "Aircraft Movements" figures per month by quadrant at Sydney Airport. **How "movements" is**

unquestioningly accepted to portray noise event impacts is beyond me as a layperson.

They may all be noise events at the airport, but they're not equal in impact in the air.

- "Let's keep take-offs underneath landings so they're out of the way, nice and low near peoples' houses. I know that's not how they do it in other places, but we've always done it that way. That's noise-sharing; we'll give everyone under the flightpath a dose, even 20km away, whether they need it or not. I'll tell you what, how about we take off nearly all jets from the new runway over the Eastern Suburbs and we'll keep the the long runway for arrivals over Botany Bay and away from Kurnell. After all, Kurnellians didn't know that the new runway would affect them and they have such a sprawling population compared to those 'toffs' in the City and the East. We'll lease out the long runway to model aircraft clubs to keep our "runway end-impact" movements figures up. We'll throw in some A380s and 747s occasionally so it looks fair. We did it during RESA and no murders or suicides were committed as a result... were there? Gee, Sydney residents are nice people. Not like those whiners in Western Australia".

(f) requires a binding Community Consultation Charter to assist it in consulting fully and openly with communities affected by aircraft noise; and

- It consults with the community in the manner a cornered cat consults with a frenzied pit-bull.

(AA, and the major airlines, are the pit-bull in case there are doubts).

- Yes. Empirical, black-and-white and legislated! ie: Exactly like the Curfew and the movement cap. No wishy-washy "when required, when indicated" stuff please.

- Any permanent (more than a month) changes to its noise pollution load should require public approval, not just consultation, no matter what the reason.

- "Just a little bit more of what you already have" should not be allowed as a precedent to increase noise loads gradually and incrementally.

(g) any other related matter.

- Is noise pollution from Aircraft illegal? It is to play your stereo too loud. It is to speed on the road. It is to drop rubbish on the street. It is to build a new highway without noise mitigation measures in densely populated areas. It is to expose your neighbours to incessantly barking dogs. How many more studies have to be produced before it is legally accepted that aircraft noise pollution is a hazard to physical and mental health?

- Since laws are created for the "good of the many", aren't there yet "many enough" residents, particularly in Sydney, being noise-dumped on?

- The presentation of noise impacts in AA's Operational Statistics reports and ANEI/ANEF don't produce a consistent correlation to experience.

- AA has a clear conflict of interest when it comes to Industry vs Community matters. So would an AA-funded Aviation Ombudsman. How can they not?

- It's **only a matter of time** before a fully-loaded climbing twin-engine jet, turning right nearly as hard as it can at 500ft, suffers an engine shut-down and falls out of the sky on top of Eastlakes. In the last month alone, two separate incidents of quad-jets with engine issues during take-off, reported in the media. Anyone still think that it won't happen? (Ref: attachments 9 & 10)

- **AA should embark in a Twelve-Step program of its own, and start making amends to those it has, and continues to do harm to.**

DETAILED SUBMISSION by TERMS OF REFERENCE

SOME TERMINOLOGY:-

Marub Departure: A peak-period parallel runway mode flightpath (and supposed noise-sharing MODE-15 flightpath during RESA) that has jet aircraft taking off from runway 34R to the north, and then executing a hard-right turn at about 500ft. They then track out to the East on the shortest course to water. They are supposed to track over the parklands and Golf Courses (see

NMT attachment map, there's plenty of them) in Eastlakes, Daceyville and Kingsford but can't avoid overflying Maroubra and the south-eastern suburbs. They rarely manage this and fly over the Eastlakes Village instead. Each jet departure noise event lasts approximately 30 seconds and starts with turbine induction "grind" that sounds like a bomb dropping from a plane, followed by jet roar and rumble.

Entra Departure: As above but maintaining runway heading a little longer and doing a smaller turn to track over inner city suburbs in a very narrow corridor. They then cross and head out north of Sydney Harbour, probably towards The Entrance on the Central Coast. These are quieter in Eastlakes but last longer.

Rwy 25 Arrival: Arrival track used only during noise-sharing, sensitive periods, and in strong Nth/Sth runway cross-winds, where all arrivals are funnelled into one active arrival runway. Arriving aircraft track West after crossing the coast around Coogee, and follow a narrow corridor over the south-eastern suburbs, including Eastlakes to reach Mascot. Departures are generally to the south off both Rwy 16L & 16R. Rarely is Rwy 25 used as a single runway for both arrivals and departures. Each noise event lasts for about 15 seconds and is much less objectionable in nature, being mainly hissing and some whining. Some are almost silent where I am, 400m from the flightpath track.

Rwy 07 Departure: This is so rarely used by jet aircraft that its flightpath is a mystery to me. Presumably it is the reciprocal of the above, with the option of aircraft to turn right for southern destinations, or left for northern destinations when they have reached water. Because rwy 07 is considerably longer than rwy 34R, it should mean that jet aircraft can reach higher altitudes within airport limits, and even more so since there are no hard turns involved during climb. The one time I saw this in use in the last three years, a B747 had a lesser noise impact to me 400m away in Eastlakes, than an average 34R "Marub" departure. This has been replaced almost exclusively by "Marub" Departures for jets.

AA: Airservices Australia
Airport Community Forum

NEU: AA's Noise Enquiry Unit

SACF: The Sydney

SACL: Sydney Airport Corporation Ltd. **KSA:** Sydney's Kingsford-Smith International Airport

LTOP: Long Term Operating Plan for Sydney Airport Noise Sharing

IMC: Implementation & Monitoring Committee for LTOP

Rwy 34L/16R: The main and original longer North-South runway at 340 or 160 degrees bearing depending on which way it's being used.

Rwy 34R/16L: The 3rd new shorter North-South parallel runway. It is also used as an E-W equivalent by "Marub" departures. It is the shortest runway at KSA.

Rwy 07/25: The East-West runway at 250 or 70 degrees bearing, depending on which way it's being used.

RESA: Runway End Safety Area (extension project over the last 18 months involving building a 90x90m speed-arresting area in case of aircraft runway overshoot)

This forced the closure of the East-West runway (25/07) for most of the time, with the E-W runway partially available before 0700 and after 2000 towards the end of the construction period.

MODE-15: A (supposed RESA-only, supposed noise-sharing) Parallel Runway Operations mode for northerly wind conditions similar to the peak-period MODE-9. It differs from M9 by having nearly all jets depart from Rwy 34R doing Marub/Entra departures, regardless of destination. Jet aircraft that would have normally headed south off 34L are reassigned to "Marub" departures off 34R, increasing the directly-overhead departure load over Eastlakes. 34L is used only for light aircraft and heavy jets incapable of doing the Marub hard-right turn or for "operational reasons" requiring a longer runway. All arrivals are onto 34L, providing respite for Kurnell, Grayndler, and greatly increasing noise events over the North-East and Eastern suburbs.

INTRODUCTION

I am a resident of Eastlakes in Sydney, NSW. When I moved here, I expected to have my share of aircraft noise from the East-West runway. Its flightpath is about 400m south of my home. I had witnessed it in action while property hunting and felt I could live with that. I didn't expect the increasing procession of jet departure noise that has been happening from the "Marub" and "Entra" jet flightpaths.

Having lived near the airport in Hillsdale, Chifley and Little Bay, I knew the runway layout and thought I knew the flight-paths of the parallel runways. Even in those suburbs, I started noticing more aircraft dwelling into the south-eastern suburbs at night and started experiencing jet departure noise which was barely there in the early 1990's. Common sense dictates that planes take off to some variation of north from a north-south runway. My experiences will be centred around Sydney's Kingsford-Smith Airport.

I am a qualified Broadcast Technical Operator, with tertiary education, and a good understanding of physics. I have a basic, and by-necessity increasing knowledge of Australian aviation. I am not an Aviation Industry Expert and therefore rely on my own observations and reading of officially dispersed documentation, as well as industry insiders' views by way of web forums, etc.

I am not a member of any anti-aircraft parties, groups or forums, and have never even heard of SACF Inc. until this Inquiry. I thought there was only one SACF; the Government-sponsored one.

Let's get one thing stated from the word go. A Jet departure noise event is more offensive in quality and often in level, and nearly twice the duration of a jet arrival noise event. A departure has a much longer and wider noise footprint. This is particularly so with Sydney's "Departures under Arrivals" madness. Turboprops and prop planes are usually much quieter than even small jets. I accept that a landing 747 directly overhead is a noisy beast, but it's a VERY different story at only 400m to the side. If anyone has doubts, come and experience it for yourself, and then pass judgement.

Following are my opinions and observations:-

(a) has conducted an effective, open and informed public consultation strategy with communities affected by aircraft noise;

NO, AA shows no initiative in directly engaging with aircraft noise-affected communities. Here, this role is served by the Sydney Airport Community Forum, not Airservices Australia. Without current SACF representation for the East, more jet traffic, in particular jet departures, has been progressively diverted over us without restraint. It is unrealistic to believe that the SACF Community Representatives for the West, South or the North would have the same consideration for residents of the East. We have unfairly suffered as a result. The weight and numbers of the Aviation Industry's representation in the SACF means that noise solutions not favourable to AA and Airlines can, and historically have been overturned, or subject to terminal procrastination, resulting in the "status quo" being maintained.

The birth of MODE-15:-

One recent example of the lack of sensitivity to aircraft noise impacts was the implementation of MODE-15 for RESA. It just happened. There was apparently consultation with the SACF, but at no time was I, as an affected resident, warned, informed or consulted about MODE-15 and its impact on me during RESA. The first I knew of MODE-15 and RESA was from Newspaper articles and Television News reports that "aircraft noise was set to soar, north of

the airport". I had to actively request information from the then Aviation Community Advocate, Airservices Noise Complaints Unit and from Ted Plummer of SACL.

A great deal has been said about the impact of RESA to the Grayndler Federal electorate. What happened in reality was that the Eastern Suburbs had many of our quieter all-aircraft-types arrivals replaced almost exclusively with jet departures. In addition, some of the jet departures that would have normally affected the Federal Transport Minister's electorate were also moved to the third runway, adding an even greater jet departure load to my area. What makes it even worse was that many were (are) during the evening "sensitive period" 2000 - 2245 AET/AEDT meaning that **we were (and still can be) potentially exposed with up to 17 hours of parallel runway operations, with nearly two thirds of all jet departures over the safe Labour Kingsford-Smith Federal and Heffron State Electorates.**
MODE-15 was initially presented to the SACF as:-

Extract From "AA - Proposed Implementation of Runway Mode of Operation 15 (Mode 15) at Sydney Airport"

Quote:-

"The use of Mode 15 would be a temporary measure implemented to mitigate the noise impacts of the total closure of Runway 07/25 for an expected period of 8 months from approximately October 2008 to **June 2009**"..... "As a result of the outcome of the community consultation, and the **temporary** nature of the proposal, the implementation of Mode 15 is recommended". End Of Quote. **AA Ref:(*1*)**

The date of MODE-15 termination quietly slipped to April 1st, 2010. Although it now appears that RESA has ended, **the end to MODE-15 is now implicated to be under threat.**

On Sunday 28th March, 2010 in the Sun Herald (See attachment), an article was published implying that MODE-15 or some version of it may be reinstated after RESA, with narrowed flight path corridors. This is after I have been personally assured by email correspondence from AA, my own State Parliament representative who was present at the SACF meetings where this was raised, and by Federal Ministerial Press Releases, that it's a RESA-only temporary situation. **I was assured that nothing like this could take place without a full Environmental Impact Study and approval being granted by the Federal Transport Minister.** How has this come to pass? Again, as an affected resident, I haven't been informed, let alone consulted. Does AA's consultation process consist of spin and damage control after "outings" by the media?

I firmly believe that MODE-15 or any other so-called noise-sharing derivative that may be instigated, is a blatant push for yet another north-south Parallel Runway Operations mode which is intended to increase traffic flow and minimise the burden for ATC to have to supervise aircraft crossings on the ground and in the air. **It WILL be inequitably managed as the whole RESA project demonstrated.**

You only need read Submissions 15 and 38 (implementation of WARRP at Perth) to get another, unrelated but recent set of perspectives of AA's "public" consultation strategies and methods.

(b) engages with industry and business stakeholders in an open, informed and reasonable way;

It certainly engages with QANTAS and the Airlines in general. It engages with Sydney Airport Corporation Ltd (SACL). Historical reading suggests that the higher the turnover the business has, the more AA values their opinion and is likely to cater to their concerns. (see SACF Inc. Senate Inquiry "sub129_SACF" submission for documented historical accounts).

(c) has adequate triggers for public consultation under legislation and

whether procedures used by Airservices Australia are compliant with these requirements;

What legislation currently triggers AA to publicly consult over anything? I'm a member of the public. **My only contact with AA has been their NEU and has resulted in nothing other than glossy information packs telling me what they do and how wonderfully they do it. How would the public know if they aren't complying with their mandate? How can the public prove that they aren't complying when we have to rely on closed-door information policies and copyrights on their "security" and "copyright" censored and time-delayed information releases ?**

There is no method for noise-affected residents to directly exert any pressure on AA to be equitable in managing Sydney's noise exposure patterns. Despite my plentiful noise complaints and inquiries to the NEU, Mr Dudley has never corresponded or spoken with me, seeking any ideas on how AA can make things better for the Community.

AA runs a polite and sometimes "apparently sympathetic" Noise complaints Enquiry Unit. They record the public's noise complaints and attempt to explain in general layman's terms why noise is happening. If they are pressured for a specific reason why a particular runway mode is in operation, they will often reply non-specifically or with a non-publicly-verifiable justification, or even suggest that we talk to community reps on the SACF. **I'm not shooting the messenger here; that's all that they can do.**

No process exists for the NEU to implement or initiate change, either during periods of peak noise complaints or as a follow-up for future similar conditions. **The complaints do not trigger any modification of runway configuration.** The **NEU has implemented a one-contact-one-complaint policy.** (Initially, this wasn't the case for me; they accepted multiple complaints on a single FAX.) This means that **if you want to complain** about 20 overflights that have affected your day, **you have to bear the inconvenience** of 20 phone calls to FAX or phone in your complaints. I don't know if it's Freecall or charged. **You are forced to pay in one way or another, for the privilege of complaining about how they are disrupting your life.** You can use the web form as an alternative, but I wonder how long it will be before they find some way to restrict this option also.

Noise Complaints, no matter how many, do not appear to result in any community-favourable outcomes by any section of AA, Management or Operational. Consideration of which areas have been retrospectively exposed to sequential days of aircraft noise results in no discernable change of policy or runway configuration decisions, EVER.

No mechanism exists compelling Senior or Supervising ATCs to review previous days of noise exposure patterns. Decisions of runway mode are made on each day as though no other day has ever existed. This can lead to several consecutive days of the same areas being noise-exposed without due consideration. This is based on weather conditions, predicted and current traffic flows, and convenience for ATC to manage that traffic. Insider and Media testimonials suggest that ATC staffing levels bear at least some impact on this. Fear of repercussions due to "incursion incidents" and "airspace breaches" upon ATCs pushes the most easily manageable option ahead of noise abatement. **The human impact on community is the last and incidental concern.**

Noise Complaints statistics are publicly released 1, 2 or more months after they are received, via AA's Operational Statistics reports, available deeply buried in sub-menus on their website. You actively have to navigate and look for it. Noise Reporting is not an aspect pushed by AA or the Sydney Airport websites. (<http://www.airservicesaustralia.com.au/> Try it for yourself). For example, the February 2010 Op Stats were released to the public on AA's website in late March. This is actually very timely compared to periods in the past. How would a

concerned, but AA-inexperienced member of the public correlate "Operational Statistics" with Noise Reports?

These reports may not automatically trigger a thorough review by the SACF. The SACF may have access to this information ahead of the public, but with no community representative for the East, this is of no obvious benefit to me or my neighbours.

The release of minutes and correspondence from the SACF is even worse. Minutes have to be ratified at the next meeting, sometimes three months later. Then it has required me to send the Secreteriat emails practically begging for an update. This happens regularly, not as a one-off. **It's not anyone's fault but part of the whole bureaucratic, bum-covering process** so that no-one can be held accountable for mistakes in transcripts. It happens even in Strata meetings, but **it's such a hindrance to community information.**

Trying to find out what has already been discussed, and trying to formulate submissions for discussion in time for subsequent SACF meetings is an exercise in frustration and realistically, near-impossibility for a layperson. Maybe the whole process of aircraft noise management relies on this bureaucratic methodology, hoping that the public will give up with a feeling of futility.

The whole MODE-15 implementation is a prime example of this. You don't hear about what is happening until it already has happened, and then it's too late to act on it.

This lack of expedient public release of information by both the SACF and AA is unacceptable when dealing with issues of such public impact and sensitivity.

AA Operational Statistics Reports still provide no information to the public on why a particular runway mode is in operation, despite several attempts by the former Aviation Community Advocate (ACA) to coerce them to do so in the name of transparency. If it ever comes to pass, something other than "weather conditions" or "traffic management" or "delays" need to be presented so the public can realistically assess if it's a genuine requirement or one of business convenience.

(d) is accountable, as a government-owned corporation, for the conduct of its noise management strategy;

From what I can gather, AA is self-regulated with no accountability other than to the Federal Minister for Transport. I may be wrong but it's not apparent otherwise. Judging by the reasons cited as being responsible for the Global Financial Crisis, I would suggest that this is not a formula for embracing community interests ahead of business concerns by profit-making entities such as Airservices Australia.

The Sydney Airport Community Forum is the only known method to engage AA in Sydney, with any hope of a change in Aviation practices. SACF is the only existing community tool. **SACF can only make suggestions and recommendations,** but it seems to require co-operation from SACL and AA. **No-one (except perhaps the Federal Transport Minister) has the authority to implement change in practices, and this appears historically to favour business considerations over community noise concerns, even if the initial intention was otherwise.**

During RESA, runway mode selection practices (especially MODE-15) can easily be interpreted to have shown political bias for extended respite periods for the Federal Transport Minister's and his wife's electorates. (see (g) any other related matter. Federal Labour Government and AA spin doctors in action: A Media History of RESA. Do we trust them

again?:- for examples).

I had great hopes that things might change by having one of the most active protesters against aircraft noise in this position. We seem to be getting a repeat of procrastination and unwillingness to commit to identification of a 2nd Major Sydney International Airport by a finite date, all over again. The threat of permanent MODE-15 *could* easily be "misconstrued" as if the Mr Albanese is trying to expedite a "set-in-stone" strategy to alleviate noise for his own electorate in case his tenure discontinues. If he succeeds, **history shows that it would be near-impossible to reverse such a situation**, especially if it suits AA. **I sincerely hope I'm wrong about this.**

We are now waiting to see what happens from the 1st April 2010 onwards. **The disposable jet aircraft noise dumping ground has been the Eastern Suburbs.** If there has been any accountability, how has it been demonstrated?

(e) has pursued and established equitable noise-sharing arrangements in meeting its responsibilities to provide air traffic services and to protect the environment from the effects associated with aircraft for which it is responsible;

This is an emphatic NO. Community noise exposure seems last on AA's list of priorities and is viewed as an inconvenience that must be dealt with. Sadly, on www.pprune.org/formums/ there are examples of even pilot attitudes suggesting that we "public" whinge and should have known that we'd get this living near an airport. Yeah? Who's going to warn us in advance? ASA?

Nothing prepared me for the first sunny day in Eastlakes, when a **parade of low-altitude jets were doing a hard, right-hand turn over the top of high-density Eastlakes Village at up to every three minutes.** Nice days equate to northerly winds, more often than not, in Sydney. This went (goes) on from curfew to curfew on some days. **I don't call this noise-sharing and there is no existing or planned mechanism to address these conditions that I am aware of.** AA appears to favour 34-direction Parallel Runway Ops and will maintain parallel runway operations for as long as they think necessary to maintain traffic flow, regularly past the 2000 AET/AEDT "sensitive time".

AA has consistently failed to come up with any noise-sharing mode to provide respite to the Eastern Suburbs in Sydney's annually dominant Northerly winds (* this weather report is provided courtesy of Jack at AA's NEU). **The most obvious scenario of cycling jet departures primarily from one north-south runway for an hour or two, then the other, hasn't been implemented.** MODE-15 did a form this, grossly biased to one runway (34R) only, making things much worse for us and better for Kurnell and Grayndler.

Even a mode where some jets take off from 34L and some from 07 would be a more equitable noise sharing scenario that would allow even "heavies" to depart from the E-W runway. **This would even alleviate some of Grayndler's concerns about bearing all the "heavies".** The runway is long enough and it does just this in noise-sharing MODE-7 with take-offs to the West. **This excuse of "operational complexities" is wearing thin.** There are **far more community members than AA staff.** Most operate from an air-conditioned silent room in some other part of Australia. They don't experience the impact of their decisions. They are well paid and **their job is meant to be complex**, otherwise anyone could do it.

Take-offs on the East-West runway to the East are rarely used by jets. I can only recall one day in the last 3 years that jets used it briefly during gale-force easterly winds. The noise impact to me was significantly less than the hard-right-turn-off-Rwy34R "Marub" departures we face

regularly directly overhead. **Somehow operating crossing runways in the Easterly direction for jet take-offs is more complex to AA ATC than in the Westerly direction for Rwy 07/25.** Funny how **the other crossing MODES 5, 7 and 14a feature sort of regularly.** There isn't an objection to operate in MODE-13 (landings & take-offs to the West on only Rwy25), even in peak periods, if crosswinds are high enough. This even happened occasionally during RESA.

On Thursday 4th February, 2010, "Aerodrome Works on Taxiway Tango and Lima" (courtesy of www.rwy34.com/) **meant that Rwy 34L&R were used for arrivals, and 34L only for departures. The airport didn't stop and it means that it can happen if necessary. It's simply that it doesn't.** This is a reciprocal mode to RESA's MODE-15 that I hoped could be implemented. It could provide some very limited respite for us in N/NE/E winds that we currently unconditionally **can't EVER have.**

A review of any recent AA Operational Statistics report, namely the "Aircraft Movements - Jet Aircraft Only" table reveals an interesting trend.

During southerly winds and parallel runway ops, the majority of jet arrival and departure traffic is handled by the main, long runway (16R/34L). In northerly winds, the converse is true. The runway doesn't change in length, but magically the long runway is required mainly for jet arrivals, and light aircraft departures and the shorter 3rd runway (34R/16L) can suddenly accommodate more than 60% of jet departures noise-affecting the East and North-East.

I have been told by the NEU that it has to do with **flight-paths** and keeping departures underneath arrivals. They **are not railway tracks in the sky, and can be modified if AA was serious about mitigating noise impacts.**

Mode-15 during RESA (and now under threat as a permanent measure) has been an abomination for the Eastern Suburbs of Sydney. It provided respite to Kurnell and Grayndler at Kingsford-Smith and Cook's expense. I have already mentioned the **skewing of flight patterns against our interests** earlier.

From "AA - Proposed Implementation of Runway Mode of Operation 15 (Mode 15) at Sydney Airport"

Quote:-

"There is no change to non-jet aircraft departures which will use the same runways and flight tracks as the existing Mode 9, therefore the analysis that follows focuses on jet operations."

"Conclusion

The use of Mode 15 would be a **temporary measure implemented to mitigate the noise impacts of the total closure of Runway 07/25 for an expected period of 8 months from approximately October 2008 to June 2009.**

The results of the TNIP analysis indicate that the implementation of Mode 15 could provide respite to areas to the immediate north and the north-west of the airport during non-peak periods by transferring some jet departures to Runway 34R.

The extra jet departures from Runway 34R will be spread between the two existing departure tracks and will result in some increase in the daily range of aircraft movements as well as a decrease in the number of days without overflights and decrease in total respite.

The implementation of Mode 15 will provide **respite to Kurnell** during non-peak periods when **all arrivals are transferred to Runway 34L**.

The results of the sample Mode 9 day analysis identified 15 **jet aircraft departures** that could **have been reallocated from Runway 34L to Runway 34R during Mode 15** operations in non peak periods. **The additional traffic would depart via the MARUB track over the eight hour period."** My Comment: That is, directly over Eastlakes and the East.

"The introduction of Mode 15 is likely to increase jet departures from Runway 34R by approximately 5,453 movements over a 12 month period. My Comment: I guess that's not significant in someone's mind.

At this stage it is expected that **aircraft that would have departed Runway 34L and tracked via RIC or KAT that can operationally use Runway 34R, within the limitations of the current noise abatement requirements, will depart via the MARUB track** to a point 15 nautical miles east of the airport. These aircraft will use a new Standard Instrument Departure (SID) which will require aircraft to **re-cross the coast at or above 15,000ft** before overflying the Cronulla-Bundeena area. **At this altitude the noise level on the ground is expected to range between 52 dB(A) and 62 dB(A)** which is below the level of 70 dB(A) generally considered to be the external sound level below which no difficulty with reliable communication from radio, television or conversational speech in a typical room with windows open is expected."

End Of Quote: Ref:(*1*)

My Comment: Up to 62dB(A) at 15000ft in Cronulla-Bundeena. Imagine what it might be, and is, like at only 500ft or so in Eastlakes.

The SACF raised no objections in two sittings about the extra noise load that would be presented to the East. What appears to have not been adequately comprehended is how **MODE-15** was used during noise-sharing periods, especially "sensitive times". This meant that those additional "15 jet aircraft departures " daily (an often fictional figure in practice) were mostly concentrated over the East between 0600-0700, 2000-2245, and Sunday nights. They were more often than not, "Marub" departures directly over us. Additionally, **MODE-15** was also used as "daytime noise sharing" mode almost unconditionally in northerly winds. This meant curfew-to-curfew **MODE-9-like, Marub-biased, Parallel Runway Ops jet departure noise**, with it getting potentially worse, rather than better at the day's extremes. And they now want it to become permanent, presumably because it's easier for ATC to manage a parallel runway mode over a crossing runway mode.

In southerly winds during RESA, where jet departure noise impacts are relatively insignificant, there was no such bias introduced. Coincidentally or not, **SODPROPS was most often used in these conditions, providing near-total respite to Grayndler from even arrival noise**. Kurnell was also spared from directly-overhead jet noise. Rarely was **SODPROPS** available during the day to provide respite to us in northerly winds. It was **MODE-9, MODE-15, or the highway**.

A comparison of the Jet Departures figures from Rwy 34L vs 34R using AA's own Op Stats reports ("Runway Movement Summary – Jet Aircraft Only"), randomly chosen for June 2007 (pre-RESA) and November 2009 (during RESA), will reveal a largely increased bias to jet departures from runway 34R.

This needs to be viewed on an each-day basis, rather than looking at totals for the month. There are undoubtedly even better examples published by AA if one has the time to trawl through them all.

Light aircraft are being redirected to 34L departures. **34R does near two-thirds of all jet departures during 34 parallel ops.** The overall “totals” make it look like 34L is suffering the greatest impact. They don't reflect the increased and clustered frequency of noise events we are suffering from all these noisy and widespread-noise-footprint jet departures directly over us at up to every three minutes, or less, during northerly wind conditions.

From reading other submissions, and discussions, **the 34L departure track has it's own problems.** The lovely colourful flightpath maps produced by AA, imply a nice spread of departure tracks from 34L that we aren't worthy of, off 34R. The problem is that they don't happen regularly, meaning that the same residents get happy-hippo 747s, 777s and A380s gracefully rattling their windows time after time.

The initial pre-LTOP trend of biasing departures to the south for over-water take-offs has been abandoned shortly after LTOP was implemented. Despite improvements to aircraft performance and navigation, **down-winds that could be tolerated before no longer are.** Down-winds of up to 12kts are still tolerated by commuter jet pilots, prior to a runway mode change on approach of a southerly change, in order to avoid scheduling delays. The mandate for regular cycling of runway modes has also been removed. You can view the SACF Inc.'s submission on our now upside-down airport for more details on the insanity of this regressive move for KSA's noise load. Additionally the Sabre report commissioned for LTOP states that departures to the south (MODE-10) yields a higher capacity than to the north (MODE-9/15).

Departures to the south theoretically expose no suburbs to jet departures directly over them, minimising both noise and hazard risk from falling debris, potential crash risk and vortex damage to name at least some factors. Now **the dominant trend is to arrive from the south and depart to the north over** some of Sydney's most densely populated suburbs. As well as the crash/falling debris risk to innocent victims on the ground, the noise is widespread, although far from equitably.

The LTOP flight paths currently in service are far from fairly sharing noise. We are going backwards in most senses.

Here's an example of what could be versus what is: In the last few days, we have had a regular diet of MODE-5 (all arrivals from the East over Eastlakes/Mascot on runway 25). ATIS is indicating winds that are within 10 deg. of the trigger point for direction of operation on the E-W runway to either be to the East or West (160 deg. is the trigger point). Downwinds at such near-perpendicular angles would be small however we are being exposed to this for the fifth day in a row. If RESA was still on, this would be one of the few times we would have had total respite. The West has had virtually nothing thus far. In light of the downwinds tolerated by pilots when it suits their agenda, MODE-14A (arrivals from the West on Rwy07) could have been used with a small tailwind in order to share the noise. How is this fair?

**** When was the last modification of LTOP flight paths in an attempt to minimise noise exposure or imbalances to Sydney? ****

The "Marub" departures that were implemented as part of LTOP appear to be “sloppy”, and the excuse offered why aircraft don't consistently track over parkland and Golf Courses simply consists of “weather conditions”. How can weather conditions change that significantly between consecutive departures? The larger, noisier twin-jet aircraft in particular seem unable to make that hard-right turn tightly and end up tracking over Mascot and the entire Eastlakes Village before doubling back and then East. **There is no recourse or penalty imposed for this, and never any accountability to the public.** It's only since the implementation of WebTrak that any evidence is available, albeit for only a few days before it disappears again. How is one meant to present this evidence to the SACF or anyone else? Are we meant to use screen recorders on

our computers?

I understand that initiating a runway mode change is a large exercise, but ever increasing traffic levels, and the **"set-and-forget" nature of the Parallel Runway Operations modes (9, RESA-15, 10 and the dwindling SODPROPS)** mean that mode changes were not regular during RESA. **This was/is particularly so in 34-direction ops, where noise impacts are inherently greatest.** If AA ATC can find a reason to stay in one mode history indicates, that they will, **at least until it is convenient for them.** During sudden weather condition changes they will change runway modes, and change quickly. This illustrates that it *can* happen.

As a result of RESA, a precedent (that the public had no say in) about acceptable noise exposure may have been set, encouraging the belief that AA can run a greater duration of high-capacity, noise-polluting Parallel Runway Ops.

Traditionally, **Sunday** is viewed as **the most noise-sensitive day of the week.** Increasing traffic volumes **now places its noise load ahead of some mid-week days.**

All this serves to highlight AA's determination to do things their own way. This is regularly demonstrated by limited and (hopefully unintentional) coloured disclosure of facts without actually lying, resulting in the point where intelligent people in the SACF, and the Federal Transport and Environment Ministers perhaps also, accept their presentations without question.

(f) requires a binding Community Consultation Charter to assist it in consulting fully and openly with communities affected by aircraft noise; and

It most certainly does.

In his recent White Paper, **the Federal Minister for Transport & Regional Services proposes an AA-funded Ombudsman with no actual powers of reform or control.** This is a recipe for losing even more public confidence, and it's unlikely that (s)he would not feel pressured to favour the Transport Minister's, Airlines' and AA's viewpoints over the public. **At a Corporate level, AA can not be trusted to self-regulate,** especially if appeasing the public results in a loss of revenue or traffic volume reduction affecting their perceived performance towards their clients, the Airlines and Airport.

Mr Tony Williams was assigned as an independent **Aviation Community Advocate** prior to RESA. He is experienced in Environmental Impact issues and is very knowledgeable on issues of aircraft noise and the initial intention of LTOP.

During his time he **was invaluable in stimulating an increased use of Simultaneous Opposite Direction Parallel Runway Ops (SODPROPS)** to levels previously unheard of. **SODPROPS is the preferred noise-sharing mode at Sydney Airport as it provides respite to nearly everyone.** I believe he was not favourably received by AA, and faced arguments and excuses at every turn about why SODPROPS hadn't been used more frequently up until this point. Weather conditions had of course some bearing on this. **When his services were terminated by the Federal Transport Minister, citing funding shortages, the use of SODPROPS backed right off again.** The reader can draw their own conclusions why this may be, weather conditions notwithstanding.

If an AA-funded Aviation Industry Ombudsman takes on the role replacing an independent Aviation Community Advocate, what possible confidence could the general public have that their concerns will be acted on, or even taken seriously? Doesn't this present a

blatant conflict of interest?

There needs to be a completely aviation-industry-independent official, with no political or fiscal affiliation with either the Government or the Aviation Bodies (s)he presides over or affects. This official MUST have the power and brief to initiate and implement change in any matter concerning AA's practices affecting the wider community. We don't need another "toothless tiger" wasting time and money and achieving nothing tangible or community-favourable.

Aircraft Noise affects hundreds of thousands of Sydney residents alone and we have no direct recourse over it. **It would not be suprising if AA uses Sydney's "apparent" acceptance of increasing aircraft noise exposure as a precedent to model a similar course of action at all sites it manages aviation services for.** It may even advise airport owners and operators on how to go about minimising public backlash, while still achieving their profit-oriented goals. The public doesn't know what is going on behind the scenes.

I have never been able to determine if there is an empirical statement of how AA will manage aircraft noise. **There is no categoric "we will change runway modes every 4 hours to minimise any noise exposure imbalance to Sydney, unless it truly poses a risk to aircraft safety".** Their published LTOP checklist is so conditionally-vague that a pilot may request a particular runway for "operational reasons". This could be anything including trying to beat a curfew, to not exceed continuous flight time, to save fuel, or who knows what.

There is a website (www.condellpark.com/) that refers to "boiling frogs". It states that if you put a frog in cold water and slowly bring it to the boil, it won't try to escape and will allow itself to be boiled to death. That is what is happening with aircraft noise from Sydney Airport. **Residents are giving up complaining to AA, not because noise exposure is being better managed (quite the contrary) but because it falls on disinterested, hearing-impaired ears.** The only result is a figure in a Noise Complaints table, and a "Complaints vs Complainants" chart buried within AA's monthly Operational Statistics reports. **Who, with power to achieve change, actually looks at and acts on it?**

Despite their public stated mission statement of safety first, traffic management will always be AA's primary concern unless someone independent, with community noise concerns in mind is constantly scrutinising their choices and can force compliance legally. In an official capacity, that brief doesn't exist and there are no signs that it ever will.

(g) any other related matter.

Conflict of interest:

My understanding of Airservices Australia is that it is a Government-owned, partially-Government-funded, yet profit-making organisation that also sells ATC services overseas. It prides itself on selling best-practice Air Traffic Control services, yet seeks to cut all cost bases in Australia. Searching through the "Professional Pilots Rumours Network" website (<http://www.pprune.org/forums/>) will reveal insiders opinions of how AA treats its ATC staff. You won't find many suggesting that they are a best-practice employer in Australia.

Whether or not you support Dick Smith's views on Aviation in Australia, he makes some very compelling arguments in his book "Unsafe Skies" (http://www.dicksmithflyer.com.au/the_book.php). **It highlights the cost-cutting, responsibility-dumping and convenience measures that AA strives to implement in Australian airspace, while feeding the public a diet of how safety is their primary concern.** The opposite is suggested as happening for its overseas clients where assured funding is less of

an issue.

From Dick Smith's Unsafe Skies" Flyer (16. Conflict of interest stops and then reverses the reforms) at http://www.dicksmithflyer.com.au/the_book.php :-

Quote:

[Airservices Australia has a conflict of being in charge of the design and declaration of airspace, while at the same time being required by the Government to maximise the profits from the airspace. It is in fact a double conflict – not only can Airservices Australia maximise profits by reducing the cost and their own liability when operating the airspace system, but it also links the take home pay of the people who make the regulatory decisions on airspace with the profits.

That was originally denied by the Government. In a letter dated 21 April 2004 from The Honourable Warren Truss MP, the Federal Member for Wide Bay, to one of his constituents, he stated:

“I assure you that contrary to the suggestion in your letter, Airservices does not pay its management bonuses based on the profits made. There can therefore be no question of a conflict of interest in its activities in this regard.”

Note how Mr Truss says, “There can be no question of a conflict of interest.” He obviously knows there would be a conflict of interest if there were a link. Fortunately the truth came out two weeks later, with this letter to a constituent from the Federal Member for Cook, Bruce Baird MP of 4 May 2004.

“I can confirm that as a commercial authority, the Board of Airservices Australia has determined a link between financial performance and at risk remuneration for senior managers.”] End quote.

Noise Reporting by AA:

ANEI/ANEF charts are not a good indicator of subjective noise exposure within suburbs.

For example, the N463 chart (during RESA) shows a slight "20 ANEF" contour bulge encapsulating the whole Eastlakes Village that is not present during N458 (pre-RESA). It is a highly temporal-averaged chart, taking into account both 16 and 34 direction parallel runway ops periods. What it doesn't show is the inhumane frequency of jet noise events that happen during sensitive times as a result of the restriction of the E-W runway, and the MODE-9/15 channelling of additional jet departures over Mascot, Roseberry, Eastlakes and the Eastern Suburbs jet flightpaths. **If a chart was produced on a day by day basis, I believe we would be in at least the 25 if not 40 ANEI contour on certain days.** This is neither transparent or understandable to a member of the public. It doesn't provide a realistic representation of what residents experience. Without a historically formulated “best-case” and “worst-case” map set, no-one can imagine the scenario without directly experiencing it. For example, at Eastlakes, I have explained what the worst case can be like with MODE-9/15. The best case is MODE-10, where “we could be 200km from the Airport”. You hear almost nothing, even though it's only two kilometres away. As I write this on Wed 7th April, 2010, I have had overhead jet departure overflights at 1539, 1542, 1545, 1548, 1551, 1553 AET, each lasting about 30secs. That's 2.5mins of peace per three. How does an existing ANEF prepare one for this?

AA's Operational Statistics "Runway End Impact" charts are large, bold, colourful and are probably the most used representation showing how aircraft movements are distributed

over Sydney in that month. It appears to be accepted as the reference for LTOP performance.

There is one HUGE flaw. These charts represent total aircraft "movements", excluding only helicopter traffic. There is **no distinction between jets and lighter aircraft**. An aircraft movement is anything other than a helicopter, and could be a Cessna 152, a 747-100, or the Space Shuttle. There is **no incorporation of correlated noise events and there is an assumption that all aircraft have the same noise impact**. There is **no distinction between take-offs and landings**. There is **no representation of what it's like to have all arrivals concentrated every two or three minutes into a single runway** during sensitive time (0600-0700 & 2000-2300 weekdays) tracking from Coogee to Eastlakes when Rwy 25 is being used for arrivals. There is **no representation of the concentrated frequency of jet departures every three minutes** taking off from Rwy 34R during sensitive time, while 34L is doing only a fraction of jets over the same period. There is **no representation that shows that the noise impact of a jet departure lasts on average for 30 seconds** from the start of induction turbine grind as they approach, to the rumble at the end, **versus an arrival** which might cause **15 seconds of hiss and whine**.

If "Runway End Impact" charts were produced for jet departures, or even jet movements only, they would paint a very different picture. The public would realise that the 13% to the East, 17% to the North, 55% to the South and particularly 15% to the West **LTOP figures are quite fictional as far as noise is concerned, and we would be seen to have been/be suffering far more noise than currently believed.** The jet movements over the West are miniscule compared to what the rest of Sydney continues to be exposed to and **NEVER come even close to 15%.** There is no sign that **this will ever get** anything other than **worse, as more time is spent in parallel runway modes.** The South (Kurnell) **only ever suffers a share of jet arrivals directly overhead, no (correctly-executed) jet departures.** I have been at La Perouse and Chifley and witnessed jets cutting corners by flying overhead several times, so I surmise they do it over Kurnell at times also. These would be incorrectly-executed departures.

From "AA - Proposed Implementation of Runway Mode of Operation 15 (Mode 15) at Sydney Airport"

Quote:-

"Mode 15 has the potential to provide some **respite for Kurnell residents from direct overflight of arriving traffic** and some respite to communities to the north and northwest of the airport;..." End Of Quote: **AA Ref:(*1*)**

That's the only type of directly-overhead jet noise Kurnell suffers; Rwy 34R Arrivals. **Parts of the Eastern Suburbs in the Rwy25/34R flightpath overlap can suffer from both directly-overhead "all arrivals" and majority of jet departures in changing weather conditions. This breaks, at least in part, the reciprocity mandate of LTOP.**

I have made past enquiries with AA's NEU regarding which aircraft must use certain runways. This was questioning why often, if not always, **the last jet flights of the night in 34-parallel ops are Marub departures to Melbourne affecting us.** The answer is "Operational Requirements" There appears to be a loose definition of "Operational Requirements" for choice of runways by pilots. Is fuel and time savings a valid reason for unnecessary noise exposure to hundreds of thousands of the same Sydneysiders? Why can't the last few flights to Melbourne each night be cycled off both 34 runways if northerly departures must be used? Considering it's quicker to drive to Melbourne by taking the Hume Highway than the Princes, wouldn't a westerly departure present a shorter course than tracking east in order to turn south. then west? The "heavies" have to use 34L no matter what so it's entirely possible. If the flightpath to Melbourne involves coast-hugging, there'd be far more fuel wasted on this than the initial SID I'd surmise.

The placement of the Eastlakes Noise Measurement Terminal is in the wrong place. It

reflects noise impacts from **the East-West runway**, and may have been there from before the third runway for all I know. It seems **unreliable at detecting 34R Marub departures**, as observing Webtrak for any length of time would attest. Also, and more so, "Marubs" are so sloppy, that many of them go around it before resuming an eastern track. The inference that can be drawn is that **noise events are louder and more frequent than indicated. Requests through the SACF for a portable NMT for Eastlakes and Roseberry that detects all 34R departures, especially while MODE-15 was active, has gone unrealised.** I wonder why. (See attachment "NMT.jpg")

There are plenty of studies available on the web and at least one other technical submission to the Senate Inquiry, **on the effects of repeated noise exposure on physical and mental health.** I'm not an expert and won't attempt to cover these.

What I am aware of is that **the equivalent density** (level and frequency/regularity of events) **of noise produced by Sydney Airport** on flight-affected suburbs **is not tolerated** when building new roads and I imagine, **in most professional scenarios** without protection measures recommended, if not enforced. There is another Senate Inquiry submission highlighting Australian Standards Association guidelines that aren't being met when it comes to noise amelioration and planning concerns.

Is it realistic to believe that Aviation Traffic management services, no matter who they are, who can currently do whatever they want with little or no consequence, will act in the interests of the community voluntarily? I think not.

Federal Labour Government and AA spin doctors in action: A Media History of RESA. Do we trust them again ?:-

Let me state that while I appear critical of the current Federal Department Of Transport, Regional Services and Local Government, I still remain hopeful that it isn't intentionally tormenting the constituents that elected them. I am hoping that some of the actions that have occurred during RESA were implemented with the best intentions from the Government. It would be unrealistic to expect that a Minister with such a wide portfolio could possibly digest all the technical information required to embrace the total impact of such an apparently small modification of flight-paths. Also, I'm sure the "other man's grass appears greener". I hope I have succeeded in bringing to light, some previously unrepresented information.

Attachment 1: Daily Telegraph 15-08-2008:-

"Under the former coalition government, the plan had been to close the east-west runway during the works, now scheduled to begin in October.
Mr Albanese said it was now possible to keep the runway open thanks to a jet blaster barrier placed across the western end of the runway to protect the worksite. "

"Keeping the eastern end of the runway open for take-offs will ensure that residents in the north, north-west and south of the airport do not bear the full burden of aircraft noise during construction," he told reporters in Sydney today."

"The plan means residents in Sydney's east, in areas such as Randwick, Waverley and Coogee, will have 20 extra planes taking off overhead daily - 15 per cent more than current levels. "

"He said his approval to keep the east-west runway open was dependent on strict conditions, including completing the work within eight months instead of 15 as previously proposed. "

- Well, the runway may have been kept "open" but was unusable by jets for most of the construction period. Some pelicans might have benefited.

- Work started in October 2008, and MODE-15 termination, full, all-day use of the E-W runway happened on April 1st, 2010.

- That's 17 months at least by my calculations. AA Op Stats confirm that all the only modes used in Nov 2008 were N-S runway modes.

Attachment 2: Daily Telegraph 16-08-2008:-

"AIRCRAFT noise will increase over Sydney's northwest for eight months, with residents yesterday warned of an extra 30 fly-overs a day.

The Eastern Suburbs also will have to endure increased aviation - about 15 extra flights a day. Sydney airport will change its flight paths in October to allow construction of a safety zone at the western end of the east-west runway. Transport Minister Anthony Albanese said the disruption would be reduced through limited use of the east-west runway during the project. "

"The construction period would also be shortened from the original 15 months to eight months by working 22-hours a day, seven days a week. Politically, the extra noise has been evenly distributed. Labor's Maxine McKew in Bennelong and Liberal Joe Hockey in North Sydney will be affected, as will Liberal Malcolm Turnbull in Wentworth and Environment Minister Peter Garrett in Kingsford Smith.

"And, of course, every plane goes over my electorate, no matter where they are headed," said Mr Albanese, whose seat of Grayndler includes Marrickville. "

"It's a lot better than what would have happened," Mr Albanese said.

- Now it's a "limited use" of the E-W runway. It was limited alright. Now the East "only" have to endure 15 extra overflights a day.

- I also wonder how "every plane", (>60% of jets departing from non-Grayndler-impacting rwy 34R and heading N/E, E or E, then S) go over HIS electorate.

- Yes, that's a very "even" distribution Mr Albanese. More of the mythical eight months again.

- It's a lot better for Mr and Mrs Albanese. Not so good for Mr Garrett, Ms Keneally, Ms Moore and Mr Daley

Attachment 3: Sydney Morning Herald 15-08-2008:-

"Residents of Coogee, Eastlakes and Maroubra will cop 15 extra planes overhead per day during the upgrade of the east-west runway at Sydney Airport.

Under the former coalition government, the plan had been to close the east-west runway during the works, now scheduled to begin in October.

But Infrastructure Minister Anthony Albanese announced today that installation of a 'Jet Blaster Barrier' across the western end of the East-West runway will protect the worksite and allow the eastern end to be used for take-offs during the renovations.

"Keeping the eastern end of the runway open for take-offs will ensure that residents to the north, north-west and south of the Airport do not bear the full burden of aircraft noise during construction, and will get some respite when weather and operational conditions permit," Mr Albanese said. "

"President of No Aircraft Noise party, Allan Rees, said the east-west runway take-offs would affect Coogee, Eastlakes and Maroubra but residents in Marrickville, Leichhardt and Drummoyne

would still suffer extra noise during the construction period.

"They are only retaining take-offs to the east which can be done from the third runway anyway, so it's not really making any difference to people in the north and west," said Mr Rees."

"Waverley mayor, Ingrid Stewe, said she didn't get many complaints from residents about airport noise "but maybe I will in future."

Her fellow councillor, George Newhouse, said: "This is just more evidence that the long term operating plan for the airport is in a shambles." "

- Here's that magically sliding "planes" number again, with no mention that it will be nearly all jet departures, very few quieter arrivals and virtually no turbo-props or props.

- Try and find the references to jet takeoffs from runway 07/25 during RESA, especially in the first 8 months. It's false advertising, and didn't happen as implied.

- They didn't "only retain" takeoffs to the East, they increased them significantly, and not at all from the E-W runway. It was all from Rwy34R, spraying jet takeoffs over Eastlakes at an inhumane frequency at times.

- LTOP in a shambles? How could he possibly say that?

Attachment 4: Grayndler News printed 16-08-2008 Update 1:-

"All three runways at Sydney Airport will remain open while essential safety upgrades are made to the western end of its East-West runway"

"The Jet Blaster Barrier will enable the eastern end of the East-West runway to be used for take-offs. Keeping the eastern end of the runway open for take-offs will ensure that residents to the north, north-west and south of the Airport do not bear the full burden of aircraft noise"

""I know the residents of Sydney will be affected by the temporary changes in aircraft noise from this essential safety project,..."

The key elements of my approval are:

* Aircraft will be able to depart off the eastern end of the East-West runway throughout the construction period;

* Full use of the East-West runway will be available at critical times after only 8 months, not the 15 months originally proposed. Work will take place 22 hours a day, 7 days a week. Some restrictions will continue for a further nine months;

* Ensuring a fair sharing of aircraft noise by introducing an additional noise sharing mode (Mode 15) for the construction period which will allow planes to be directed off the shorter parallel runway to the east and north-east, providing relief to the residents to the north and north-west; and

* A total of 22 conditions have been set on the development to monitor construction progress, improve environmental and construction noise management, and improve community consultation.

"The previous government chose to withhold information about these necessary works from the community in the lead up to the federal election. In contrast, I have imposed conditions on Sydney Airport requiring them to consult with the community, Airservices Australia and my Department throughout the project, including monthly meetings with the Implementation and Monitoring Committee of the Sydney Airport Community Forum (SACF).

Under these conditions, Sydney Airport will also be required to maintain a community complaints service."

- Well, that "temporary changes" is now under threat of being reinstated and becoming

permanent.

- Aircraft that can depart off the Eastern end of the E-W runway don't include jets Mr Albanese, in practice. Seagulls don't make much noise, but probably appreciate your gesture.
- Full use of the E-W runway at critical times after 8 months. Anyone who wants to look at AA Op Stats will see that there were very few "critical times" before April 1st, 2010.
- MODE-15 provided respite to Grayndler and Kurnell, and absolutely bombarded the East.
- Yeah, this Government hasn't withheld any information, has it?
- Go to the SACF website, (<http://www.sacf.dotars.gov.au/>) and see how many meetings and how much correspondence was tabled. It isn't monthly.
- SACL/KSA required to maintain a Community Complaints service? Well how widely advertised and promoted was that?

Attachment 5: A.A. MP Grayndler News printed 11-06-2009 Update 2:-

"June 11 2009

The first stage of essential safety work on Sydney Airport's east-west runway has been completed on schedule, allowing restrictions on its use to be significantly eased from next Monday. This means noise sharing will re-commence during the highly sensitive early morning (6-7am) and evening (7-11pm) periods, with the east-west runway again available for both arrivals and departures operating in a westerly direction."

"Due to ongoing works at the western end of the east-west runway, landings from the west will only be possible when the runway is operationally required because of weather or medical emergencies. The restriction on landings from the west will apply until 31 October 2009.

Increasing work times to around the clock has halved the period of severe disruption to noise sharing from 15 to 8 months. Airservices Australia also introduced an additional noise sharing mode (Mode 15).

I look forward to the project being fully completed on time in March 2010, thereby ensuring the Airport can ensure for noise sharing operations.

I also thank the members of Sydney Airport Community Forum for the constructive role they have all played throughout this entire process."

- Wow, that means that we can look forward to the MODE-15 jet departure assault, *and* the resumption of periods of Rwy 25 for ALL arrivals over us. What bliss for the East!
- Oh, and landings from the West still aren't available, so there's no chance of that avenue of relief for the East.
- But from the 31st October it'll be better. Too bad it turned out, in practice, to be restricted between 0600-0700 and 2000-2300 AEDT/AET until 1st April, 2010.
- It's "halved the period of severe disruption to noise sharing from 15 to 8 months". In your dreams Mr Albanese. Not in ours.

Attachment 6: Sydney Morning Herald 17-09-2009:-

"A CLUSTER of Sydney suburbs has experienced a dramatic increase in air traffic due to flight path changes quietly introduced by Airservices Australia in an apparent breach of its own guidelines."

"Reports from Airservices Australia which map the density of flights over Sydney reveal the

emergence of a concentrated stream of aircraft over a nine-month period."

"What the Government has allowed to happen is a new flight path running right across Sydney, and in particular over the Sutherland Shire," he said. "It's not just the noise, it's the repetition early in the morning and late at night."

"Having initially denied to Mr Morrison that there had been any unusual increase in the concentration or number of flights, Airservices Australia changed its position yesterday. It told the Herald that there had been an increase, but that it was the result of safety works being carried out on the east-west runway. "This has led to the use of ... Mode 15,....""

"But the dramatic increase in the number and concentration of aircraft movements is an apparent breach of Airservices Australia's own guidelines, which specify that aircraft movements over built-up areas should be spread out rather than concentrated to reduce noise impacts.
It also breaches similar principles set out in the Sydney Airport long-term operating plan which came into force in 1997."

"Kevin Hill, one of two community representatives on the committee which was set up to implement the operating plan, said Airservices Australia had not made committee members aware of the changes it was proposing. "If they had said there was going to be a tenfold increase over these houses, there would have been total opposition," he said.

Airservices Australia said it had informed the committee of the changes."

- Well, not only the East, but also Cook. What a well thought out and executed plan MODE-15 has been.
- The concentrated stream also includes the Rwy 34R departure assault.
- Repetition during the early morning and late evening... Sounds familiar.
- Spread the noise? Sorry, that's inconvenient, except when it's convenient.
- If they had fully disclosed, and MADE the SACF members truly understand the impacts of MODE-15.....

Attachment 7: (Transcript) ABC Stateline NSW 28-05-2004:-

I won't quote from this, but reading the transcript will reveal exactly what I have said about "Marub" departures and the general madness of AA's airspace management. This includes both the safety and noise aspects. The **date of this transcript shows how long this has been known for**, and constantly swept away from public awareness.

Attachment 8: Sydney Sun Herald 28-03-2010:-

"Airservices also said it was examining if almost all northerly departing flights from Sydney Airport would be directed over the eastern suburbs, depending on the time and weather conditions. This use of the runways, known as Mode 15, was regarded as a temporary measure during the safety upgrade. If the mode is adopted permanently, departing flights will be directed away from the Grayndler electorate of Transport Minister Anthony Albanese towards Vacluse, Watsons Bay, Maroubra, Eastlakes and Pagewood."

"Airservices advised the Sydney Airport Community Forum last year that this proposal would require referral to Federal Environment Minister Peter Garrett to determine if any action should be taken on potential impacts. His Kingsford Smith electorate would bear the brunt of these flights."

"The complexities of extending the safety area over the M5 East tunnel and the city's largest

sewer pipeline had meant the runway had to be closed or restricted from October 2008 until April 1 this year. Costs blew out by almost 20 per cent."

"Liberal member for Cook, Scott Morrison, has sought assurances from federal authorities that the reopening of the east-west runway would end this (read: MODE-15) practice. But when he asked what mitigation measures could be undertaken, "I was told they could give me no guarantees".

"Mr Albanese was unavailable for comment."

- **Post-RESA and the threat of the MODE-15 torture is being canvassed again.**
- **Jet departures directed away from Grayndler towards Kingsford-Smith. No political bias or muscle-flexing here, is there?**
- **Nice how Labour loves its constituents in Kingsford-Smith so much. Maybe we still don't pay enough taxes.**
- **October 2008 to April 1 2010: Finally, the first admission of what really happened, three days before the pain was over. And now they want to do it again.**
- **No comment Mr Albanese? Are you having your trumpet re-conditioned?**

Conclusion

While I believe Airservices Australia (or any other qualified entity) **are capable of equitable noise management of Australia's aviation traffic, they are not compelled to do so, and therefore don't.** There is no obvious method for enforcing compliance when it comes to community impacts on aircraft noise. With the exception of one paltry fine issued for a curfew breach, near the beginning of the Transport Minister's reign, what else has been done?

The **current Federal Transport Minister was a fervent activist for attempting to reduce the noise over his electorate.** Much has been made about what the poor inner west and north-west has to go through, because **the loudest voices seem to get the most attention.** "Boiling Frogs" and "No Aircraft Noise" have an agenda to look after their interests and I would not expect otherwise. **I commend anyone that tries to make a difference** to this contemptible situation we face in Sydney.

What is being conveniently glossed over is that the parallel runways are 1km apart. We can barely hear 34L departures in Eastlakes. 34L arrivals are inaudible. 34R "Entra" departures are audible but not generally overly intrusive. **1km makes a significant difference, particularly for narrow-noise-footprint arrivals.**

Suburbs under the 16 L & R arrival tracks don't individually experience the full arrival load of all jet traffic like we do when Rwy 25 is in operation.

Rarely does Rwy 34L bear the load of "most jet departures" over the inner West/North-West. We REGULARLY had to bear the load of nearly two-thirds of jet departures from Rwy 34R in Kingsford-Smith. We are now under threat of this continuing.

At no time does Kurnell Village have to bear the load of ANY legitimately-executed jet departures directly overhead.

The worst Kurnell bears is overhead arrivals of only 34R in MODES 9 and 7, which can't be any more than Rwy25's (since they can't land any closer together than they already do), and is potentially less than half of our Rwy 25 arrival load when it's in operation. 34R being a shorter runway than 25 means that some larger aircraft can't land on it in some conditions at least.

The East is being dumped on and no-one in power is lifting a finger to do anything about it except recently for my State Member, who also happens to be the Premier of NSW, and

her industrious Electorate Officer Phil Norman. Tony Williams continues to be of invaluable assistance, but he has to operate in a voluntary capacity, and can no longer question AA or the SACF directly.

Some of the perennially unaddressed issues at Sydney Airport, not directly part of this Inquiry include:-

- The continuing procrastination to identify a site for a replacement Major International or Domestic airport site for Sydney, while never officially ruling it out either. We're forced to live in apparently false hope.
- Increasing traffic load at Sydney (and other Major Hub Australian airports). Any noise reduction through technology is overridden by increased frequency of noise events.
- Reduction in duration of noise-sharing during "sensitive time".
- Reduction in total respite periods.
- Increasing jet aircraft load (particularly the noisier twin-jet departures) towards the East.
- Escalating adoption of fuel-efficient twin-jet aircraft means that the push will continue to funnel a greater proportion of jet departures off Rwy 34R, implying the jet noise departure burden will skew further towards the Eastern Suburbs in northerly winds. There already is a >60% bias this way, and if 747's and A380s could make that turn, they would be over us also.
- No identification of a suitable noise-sharing mode in Sydney's dominant NNE/NE/E wind conditions at certain times of the year resulting in a relentless curfew-curfew noise assault on the Eastern Suburbs.
- Coloured (maybe not intentionally) presentation of "Runway End Impact" information that doesn't demonstrate what noise we as residents experience, particularly during RESA and particularly in the East.
- The continuing mention of quieter, new aircraft such as A380s, B787s doesn't highlight:-
 - * That a reduction in a noise event from 84dB to 78dB SPL (as an example) is not less disruptive to general life.
 - * That these aircraft are heavier than 737s, A320s, etc., and don't often achieve the same initial take-off altitudes and are therefore noisier on the ground anyway.

References:-

Airservices Australia

AA Ref (*1*): Environment and Climate Change Unit
Environmental Assessment
of
Proposed Implementation of Runway Mode of Operation 15
(Mode 15) at Sydney Airport

ARMS Entry Number 183490
August 2008

EO 08-191

SACL: Sydney Airport Corporation Ltd.
SACF: The Sydney Airport Community Forum
AA: Airservices Australia
ACA: Aviation Community Advocate
NEU: AA's Noise Complaints and Monitoring Unit
RESA: Runway End Safety Area Extension project of the western end of Rwy 25 at Sydney

Airport

Any references to Flight Paths, Runway "MODES", Aircraft Movement figures, etc., that I may mention can be found either at Airservices Australia's (AA) Website (<http://www.airservicesaustralia.com.au/projectsservices/reports/saos.asp?id=2009>)

or **The Sydney Airport Community Forum's** (SACF) Website (<http://www.sacf.infrastructure.gov.au/airport/LTOP/>) They have a very good Java-based animation demonstrating the flight-paths over Sydney for the various runway configurations.

SACF Inc. is a community group not directly related or affiliated with SACF.

As AA states that their material cannot be reproduced without permission, I am hesitant to attach any copies of their documents. They themselves, however, are the source of most of the information that exposes weaknesses within their own practices.

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