



Residents Against Western Sydney Airport Incorporated

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Submission on - The Airservices Amendment Bill 2018

The attached submission has been prepared by and on behalf of a community action group called Residents Against Western Sydney Airport (RAWSA).

While our organisation are primarily focused on the proposed Western Sydney Airport, we are widely concerned with other aspects of Airservices Australia in respect of locally felt impacts of Sydney Airport operation.

As secretary of RAWSA I have been asked to lodge this submission to highlight some of our concerns on the current operation of Airservices Australia and to give our support to the Amendment Bill.

Yours sincerely,

Trevor Neal
Secretary RAWSA
Residents Against Western Sydney Airport

Submission Summary

This submission has been prepared by and on behalf of a community based group in Western Sydney called RAWSA (Residents Against Western Sydney Airport).

Given the safety record of aviation in Australia, it is clear that Airservices Australia play a very successful and major role in safely managing the use of airspace for the aviation industry and for our Nation.

It is equally apparent that in doing so, Airservices Australia largely ignore the adverse impacts that the aviation industry inextricably have on resident's lifestyle, community amenity and the natural environment.

This submission supports the intent and objectives of the Airservices Amendment Bill to drive a wider and no less important range of accountabilities into the operations of Airservices Australia, including:

- A refocus of AsA attitudes to be more responsive to community expectations,
- An increased awareness of impacts on the lives of people affected by AsA decisions, planning and operations,
- Positioning the Aircraft Noise Ombudsman as a true independent entity, and
- A new impetus to find solutions to aviation generated impacts of:
 - Aircraft noise and the amenity of affected areas,
 - Adverse health and wellbeing outcomes, for residents living under flight paths, caused by aircraft engine emissions and pollution, and
 - Adverse environmental degradation on flora and fauna.

1. Introduction

Having experienced firsthand, the impact of aircraft noise that increased aviation activity is having on the lives of people, the environment and the liveability of communities, many people in Western Sydney and Blue Mountains became interested in addressing some of these impacts. The real catalyst was the Govt. announcement to build an airport in Western Sydney (WSA). This coupled with the increased flight path activity (2012 -2015) over our area from Sydney Airport, caused the community to establish a community action group called RAWSA (Residents Against Western Sydney Airport).

This involvement has exposed the local community to the functioning of AsA (Airservices Australia), both directly (through correspondence and complaints) and indirectly (through attendance at SACF¹ meetings and other community forums). While nobody can dispute the imperative for AsA to provide a safe operating environment for Australian flight operations, it has become very evident that AsA operates as a law unto itself. This is evidenced in AsA attitudes to community complaints about aircraft noise and shows that after the safety issue, AsA have too much focus on minimising airline operating costs and too little on the cost of impacts on the wider community and natural environment.

It is for these reasons that members of RAWSA have formulated this submission in the hope that the AsA Amendment Bill will be supported across the political spectrum and pass into law.

¹ Sydney Airport Community Forum

2. Issues of Concern

2.1 Increased frequency of flights over our area

In past decades up to about 2012, residents were aware of aircraft flying over the local area, but the frequency was sporadic and tolerable, resulting in few complaints about noise. However, between 2012 and 2015 there was a significant increase in the number of aircraft using Western Sydney flight paths. Correspondence² from AsA in reply to complaints acknowledged this increase in flight frequency with the following comments:

“The Blue Mountains is affected by noise from aircraft that depart Sydney Airport from the westernmost of the parallel runways and turn north-west. This is not a new flight path, but there are many more aircraft flying in and out of Sydney Airport now than in the past, and this means there is more traffic on all the flight paths. For example, in 2002 there were 252,504 movements annually. In 2005 there were 281,738 and in 2014 there were 329,588.”

Since 2015, the number of aircraft flying over our area has again increased substantially and residents living under the Western Sydney flight paths are well aware of this increase. Relative to time and noise level, many residents are now able to identify the Airline, Flt Number, aircraft type and destination, without reference to computer based flight tracking information. While wind direction can determine use of the Western Sydney flight path, daily between 6 am and 8 am, all day Tuesdays and Thursdays, as well as Sunday evenings between 8 pm and 11 pm are favourite times that AsA choose to send aircraft over our area. AsA will confirm that aircraft noise complaints from the Western Sydney and Blue Mountains area, increased significantly, from this period. In various reports, AsA simply dismiss the increase in complaints as being due the Govt’s announcement to build a Western Sydney Airport.

2.2 Decreased altitude³ of flights over our area

While there have always been occasional flyovers of aircraft at altitudes⁴ down to about 11,000 feet, the majority of aircraft flyovers have been within the altitude range of 13,000 to 18,000 feet. Since about 2015, the general flyover altitude has decreased to a range of 10,000 to 15,000 feet and is frequently now occurring at below 10,000 feet. The lowest recorded altitude in January 2018 was a Singapore Airlines Boeing 777 which flew over at an altitude of 7,950 feet. Table 1 below shows a sample of recorded low level flyovers at Emu Plains.

Table 1. Details recorded for flyovers recorded at Emu Plains

Date	Time (24 hr time)	Flight Identity	A/C Type	Altitude (in feet)
19/10/17	12:20	QF 81	A330	11,000
25/11/17	06:20	EK 415	A380	10,900
13/12/17	06:27	EK 415	A380	9,500
21/01/18	14:11	SQ252	B777	9,325
18/01/18	13:32	MH 122	A330	10,250
18/01/18	14:14	SQ 252	B777	7,950
18/01/18	14:32	VA 561	B737	10,700
03/03/18	10:17	GA 715	A330	9,675
18/03/18	12:23	XAX 232	A330	10,200
01/04/18	15:26	SQ 222	A380	8,250

² November 2015 letter to author from AsA, in response to complaint.

³ Relative to altitudes noted at Emu Plains

A cynical person might express the opinion that this decrease in altitude ranges is an attempt by AsA or their political masters to try and condition residents in preparation for the proposal to dump a 24 hour airport in Western Sydney.

2.3 Aircraft noise – noise profile, level, duration and annoyance

AsA make the mistake of utilising a defined DbA (decibel) reading to determine an ‘acceptable level’ of aircraft noise and what constitutes an ‘annoying level’ of aircraft noise. This methodology does not take into account factors such as:

- a. It is inconsistent with overseas DbA levels used to define aircraft noise annoyance,
- b. The normal level of ambient noise in any given area,
- c. The duration of aircraft noise events,
- d. The sound profile of aircraft types.

a) To demonstrate this point – AsA had input to the Western Sydney Airport Environmental Impact statement (EIS) and the lowest level of noise considered as annoying in the EIS is 70DbA. The recognised levels overseas, for thresholds of annoyance, can start as low as 45DbA.

b) Within areas near Sydney Airport, the urban density and level of human activity is such that the normal ambient noise level tends to be around 55-60DbA including overnight. In contrast - the ambient noise levels experienced in the Blue Mountains and in most parts of Western Sydney are typically around the 20-25DbA level overnight. As a consequence, annoyance by aircraft noise events will occur at a much lower DbA level. Additionally, overseas studies show there is also a significant association of aircraft noise (particularly overnight) to increased hypertension and cardiac arrhythmia for levels above 50DbA. AsA’ use of the same decibel level in either location, to determine whether they think aircraft noise is annoying or not, is clearly an unreasonable, unfair and an incorrect methodology. Therefore a key factor in determining annoyance is the degree to which aircraft noise level is above the ambient noise level. With Western Sydney Airport planned (without proper consultation) to operate 24 hours a day, 7 days a week, it should be apparent, that the accountabilities of AsA outlined in the Amendment Bill, are of great importance to Western Sydney residents.

c) In areas (such as Strathfield) closer to Sydney Airport, residents would experience aircraft noise at a higher DbA reading (due to lower altitude) than people living in the West. For example, residents closer to KSA (Kingsford Smith Airport – Sydney) may hear the plane coming for 3 to 4 seconds, be exposed to excessive noise for a similar time and then hear the plane noise diminish for another 3 or 4 seconds.

While this can be annoying, the 10 second noise event is gone rapidly leaving a noise recovery period⁵ of about 2 minutes before the next flight. Not so in Western Sydney – due to the higher altitude of passing aircraft, we can hear the plane coming for up to a minute, experience the excessive noise for 30 seconds and then hear the diminishing noise for another minute. This means the noise event⁶ can be up to 2 minutes leaving only seconds for a recovery period before the next flight. Again, AsA does not consider this to be an annoyance factor.

⁵ Where flight intervals are 2 minutes apart

⁶ Wind strength and direction may alter the timing of approach and departure phases, but does not impact overall duration of a noise event.

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d) While we cannot reference any research carried out on this point, we can relay comments from other residents and personal experiences. The annoyance felt by different aircraft types can vary greatly. While helicopter, light aircraft and even turbo prop noise events can indeed be annoying, the level of annoyance is more related to frequency of these events rather than the noise profile emanating from them.

Conversely, the sound profile emitted from jet engines is different and causes instant agitation and annoyance. Someone with scientific expertise may be able to explain why this is so, but, it is an opinion and experience shared by many.

Whether AsA like it or not, whether AsA choose to accept it or not - these factors all contribute to the level of annoyance with aircraft noise, felt by residents in the Blue Mountains and in Western Sydney. Additionally, these factors should be an alarm bell for AsA, the Dept. of Infrastructure and any political party that supports the proposal to build a 24hour airport in Western.

2.4 No redress for complainants

It is fair to say that AsA do respond to the lodgement of noise complaints with a written explanation, maps and graphs detailing why the frequency of flights has increased. However, this only occurs in the first instance and offers no practical solution to aircraft noise complaints.

2.5 Aircraft Noise Ombudsman operates under the administration of AsA

Without denigrating the character, operation or functioning of the Aircraft Noise Ombudsman, it is detrimental to the credibility of the position, in having the Ombudsman operate under the administration of AsA. This current arrangement lends itself to criticism, whether real or perceived, that it is not totally independent, in giving true and fair representation of community issues.

2.6 AsA has too much focus on airline balance sheets than on finding solutions to aircraft noise

Particularly in respect of Sydney Airport, flights could be directed over the Pacific Ocean in order to gain altitude before passing over extensive areas of urban development. This action would result in greater aircraft altitudes, lower impacts on residents and would decrease the number noise complaints.

When this was suggested by numerous residents, AsA reaction was one of shock/horror. AsA claim this cannot be done as it would increase the distance of many flights and have an adverse impact on airline fuel usage and costs.

This AsA response clearly indicates a skewing of their priorities towards benefiting the financial cost of airline operations at the cost of social, health, environmental and lifestyle impacts thrust upon residents.

2.7 Aviation generated costs are automatically passed on to the public purse

Objectives within the AsA Amendment Bill are important to bring awareness to AsA operations that their responsibilities are not just to aviation safety. It may also lead to AsA and Govt. actions to redress the inequity of the current system in terms of preventing aviation generated costs being passed on automatically to taxpayers via the public purse.

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Some of these aviation generated costs subsidised by taxpayers include:

- Increased financial burden on the Health system caused by increased childhood asthma, heart and lung disease, hypertension and sleeplessness caused by aviation noise and jet exhaust pollution,
- The financial cost of environmental programs to rehabilitate or maintain an ecological balance of aviation impacts on flora and fauna,
- Financial measures implemented by Govt. to minimise the adverse impacts of aircraft noise and pollution, on the social, environmental and lifestyle of residents living near airport and under flight paths,
- The cost of providing and maintaining infrastructure (roads and rail) needed to support the operation of airports, is not paid for by the aviation industry, and
- The favourable (to aviation industry) taxation arrangements for aircraft fuel which create an unfair, inequitable and distorted tax treatment compared to other transport means.

3. Conclusion

The proposal to have Community and Environment Representatives appointed to the AsA Board is a positive step, which is strongly supported by members of RAWSA. However, instead of increasing the number of Board Members, these two new positions should be at the expense of at least two current members, whose knowledge and expertise is duplicated in other current members of the Board.

The objectives in the Airservices Amendment Bill now before this Senate Committee have the potential to:

- Address the dismissive attitudes of ASA to the plight of residents affected by their actions,
- Refocus the AsA Board with a more balanced and appropriate outlook to serving the community,
- Make AsA more responsive to their responsibilities to environmental issues,
- Embark upon meaningful consultation processes, rather than just providing information that suits the current situation,
- Be more responsive in finding solutions to the impact of aircraft operations on the human and natural environment, community amenity and residential areas, and
- Instil accountability of AsA to the wider community, for their decisions and actions.

It is hoped that the issues outlined in this submission will be given strong consideration by members of this Senate Committee and that ultimately the Bill will be supported within the Parliament, thereby passing into law.