

JOHN CARTER

Charles, Bob (MP)

From: H.P.Richard [hprichard@hotmail.com]
Sent: Wednesday, 10 September 2003 3:31 PM
To: Charles, Bob (MP)
Cc: Harrison, Graeme
Subject: Full aircraft fuel loads UNNECESSARILY overflying 600,000+ Sydney residents

10 September, 2003

Submission to Joint Parliamentary Inquiry on Aviation Safety

Dear Mr Chairman & Committee Members,

Henri Richard is a chartered civil engineer and member of the Eastern Coalition of Airport Groups (ECAG) and SACF Inc (not the Government SACF). He was nominated by the Government's Sydney Airport Community Forum to represent the Eastern Suburbs of Sydney on the Implementation and Monitoring Committee for the Long Term Operating Plan for Sydney Airport. However, the nominations for a representative from Eastern and Western Sydney were rejected by the Minister for Transport, despite this being in clear contravention of the then-Minister for the Environment, Senator Hill's first pre-requisite for the bypassing of an EIS for the LTOP, that "the areas newly affected be appropriately represented on the relevant committees". Successive ministers have refused reasonable/proportionate representation for the areas now affected.

Graeme Harrison BE(Syd), BSc(VUW), MBA(Harvard), FAIM, MIEAust, MNIA, MIEEE JP is an engineer, accountant, statistician and a former Harvard Consultant to The White House. He is VP of SACF Inc, and a primary author of SACF Inc's 'Alternative EIS' for Badgerys Creek ('The Way Forward').

We attach a copy of a submission dated 11th October 2001, forwarded through Mr.Peter King (Member for Wentworth) to John Anderson the Minister for Transport and the Environment; no action has been taken by the Minister to address the problem of the turning around of Sydney Airport since 1996 discussed in Item 1 of that submission.

Day after day, Mode 9, involving take-offs to the North-West and East over populations up to 4,500 persons per sq km, and landings over the uninhabited Botany Bay, continues to be the preferred mode of operation even in light northerly winds and even in light southerly winds. The percentage of take-offs over the residential areas of Sydney instead of Botany Bay in 2002 was 52% instead of the historically achievable 30% (trend chart attached). The total number of people 'significantly noise affected' by northerly take-offs is over one million. But the number at risk from a conflagration is harder to measure, but over 600,000. This compares with approximately 1,000 at Kurnell who would be at risk by departures to the South over the Wanda sandhills (though these do not technically fly over Kurnell).

World's best practice (employed even by the Russians after one of their jet aircraft crashed into an apartment block) is to take-off AWAY from populated areas, whenever the weather permits. This was also employed at Sydney until 1997.

At Brisbane airport, a tailwind of up to 10 knots is allowed to direct jet take-offs away from residential areas but in Sydney the tailwind allowed is zero for the parallel runway operations (e.g. even in a 1 knot northerly wind, the jets scream out over residential areas with full fuel loads of up to 160 tonnes of fuel - equivalent to 5 road-tanker loads). The situation has deteriorated to the extent that on the short parallel runway (known as the Third Runway) only 40% of all jet take-offs from

that runway are directed to the sea through the heads of Botany Bay compared to 60% over Sydney's populous Eastern Suburbs.

Quite apart from the crash risk that normally exists in having jets with full fuel loads take-off over densely populated areas, the risk that terrorists will turn jets carrying full fuel loads into 'weapons of mass destruction' is very real. Terrorists will be mainly interested in jet take-offs (not landings carrying small fuel loads) and their act of terrorism would have to take place quickly due to the state of alertness existing in the community; hence the crash zones for their actions would be in areas overflown immediately after take-off. Quite apart from the on-board potential for terrorist acts, these departing jets are flying at low altitude over thousands of roof spaces/attics from which a terrorist would have significant cover to deploy a surface-to-air missile.

And even without terrorism risks, the current practice makes no sense. Sydney does not suffer from ice on runways, mountains on approach, heavy fogs, tropical rainstorms, etc. When these risk factors are excluded, the greatest likelihood for crash risk is equipment failure shortly after take-off. Indeed KSA has seen three such major 'ditchings' with two going into Botany Bay and a third onto the sandhills. But they were before the current government 'turned the airport around' to take-off over the people rather than Botany Bay.

One would have thought that to avoid a potential catastrophe on the ground in the Sydney residential area, Airservices Australia would have instituted measures to maximise take-offs over the uninhabited areas of Botany Bay to the sea (e.g. re-introduction of its previously abandoned 5-knot (9km/hr) tailwind limit (or even a 10 knot tailwind limit) mandating take-offs over the Bay).

Immediate action needs to be taken to ensure that the Modes of operation which involve take-offs over Botany Bay are prioritised namely Modes 5,10 and 14A (see attached file Modes at KSA.pdf).

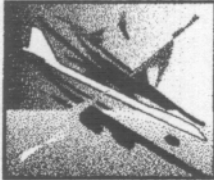
Further, it has taken two years for SACF Inc to obtain, via Freedom of Information discoveries, that CASA has not performed the promised 'Safety Audit' of Sydney's LTOP. The LTOP has been in operation for six years, and the peak safety body has refused to do the required safety audit of the operations at the country's largest airport.

With such egregious violations of existing risk minimisation practices, we find it ludicrous that the focus is on anti-missile systems for commercial airliners when, if they took off over water, the single road access to the Kurnell peninsula could be monitored by use of one or two low-cost security cameras and a minimal amount of security staff, and the people of Sydney would be far safer in terms of a massive conflagration.

Yours Sincerely

Henri Richard & Graeme Harrison

PS As we draft this email at 9.20 am the wind is 5 knots at 260 degrees meaning there is northerly wind component of only 1.6 km/hr, yet Mode 9 is operating in preference to any three of the Modes putting full fuel loads over Botany Bay.



11th October, 2001
ECAG
C/- P.O. Box 2173
Rosebay North NSW 2030

ECAG
Eastern Coalition of Airport Groups

Mr Peter King,

The community representatives of The Eastern Coalition of Airport Groups, would like to thank you for providing the opportunity to meet with in relation to the aircraft issue.

At our last meeting we raised several concerns about the operational procedures of Kingsford Smith Airport. The committee believes that two key issues warrant review.

- 1) Recommendation 3 of The Long Term Operating Plan 'Removal of the 5 knot down wind rule'
- 2) The bundling of arrivals over the eastern suburbs during Mode 9 operations

The committee is seeking your support to raise these matters with the Minister, Mr Anderson. We have compiled a submission for the minister, which is attached. In brief, it outlines the two operational practices of the airport, which we consider cause the greatest impost on the Eastern Suburbs.

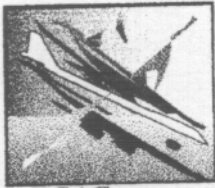
As there is a finite amount of time before the airport will be leased, we urgently seek your assistance in having the minister consider our requests.

We look forward to your response and greatly appreciate any assistance you can offer in canvassing the issues with Mr Anderson.

Yours sincerely

Mr Henri Richard
ECAG Community Representative
On behalf of the Committee

Kerry Sloan
ECAG Waverley Representative
On behalf of the Committee



ECAG

Eastern Coalition of Airport Groups

11th October, 2001
ECAG
C/- P.O. Box 2173
Rosebay North NSW 2030

The Honourable John Anderson (MP),

We write to you in our capacity as, 'Aircraft Noise and Airport Operations' community representatives. Our representation and membership spans the Federal Seat of Wentworth and includes sections of adjoining seats.

It is accepted that The Long Term Operating Plan for KSA (LTOP) is a plan which has the capacity to be adjusted to rectify demonstrated anomalies which inevitably emerge over time.

There is a degree of urgency in our request for modifications to the LTOP, as we firmly believe changes need to be considered in light of the impending Federal Election. Further, we fear that unless the issues are addressed now, the safety and amenity of the public will be permanently compromised once Kingsford Smith Airport is sold.

1. Targets for Mode 9, which send departures over the Eastern & Western Suburbs, were set at maximum averages of 31 jets and 36 jets per day respectively. In spite of the relatively small annual growth in Airport traffic these targets are now exceeded by 50% and 22%. Without question this is due to your Department implementing Recommendation 3 of the LTOP which advocated the removal of its own noise abatement procedure known as the '5 Knot down wind rule' (see Annexure A). This rule is standard international practice for aircraft departures where it is desired to ensure the avoidance of populated areas. In brief, the practice maximises safety and minimises noise by directing departures over uninhabited areas with tailwinds up to 5 knots (9 km/hr). In view of the recent devastation caused by the hijacking in the USA of jet aircraft with full fuel loads to maximise damage to residents on the ground it is imperative that wherever possible jet aircraft depart over Botany Bay, not over residents and the city. Many jets departing over the eastern and western suburbs carry much greater fuel loads than the jets which obliterated the twin towers and the Pentagon in America; in fact up to five times those fuel loads. As a result of the demonstrated crash risks and threats associated with fully fuelled jets, authorities in England moved rapidly to change the flight-paths of Heathrow Airport; flight-paths now avoid the city and residential areas. Governments which ignore these facts display a reckless indifference to the problem.

The decision to adopt the LTOP's Recommendation 3 needs to be reversed so that the use of Botany Bay for aircraft departures is maximised. Mode 9 should not be considered the prime mode as it maximises risk and noise to Sydney's residents. By reducing the use of Mode 9 both the eastern and western suburbs will benefit. The use of all modes of operation which involve departures over residential areas (currently Modes 7,8 and 9) should be minimised wherever possible.

We request that best International Practice is re-adopted by the reinstatement of the 5-knot down wind rule and the "universally accepted" departure procedure necessitating that

Departing Aircraft with large fuel loads are allotted the direction affecting less populated and noise-sensitive areas (in this case Botany Bay).

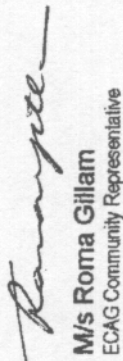
This will not only enhance the safety and security of millions of Sydney residents and Sydney's central business district, but will in part address the inequity of the noise burden, that presently exists.

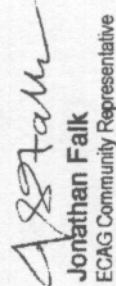
2. Arrival flight paths for Mode 9 operations, unlike Mode 10 restrict the altitudes of departure flights. Arrivals are unnecessarily bundled over the eastern suburbs. They overfly the departure corridors, capping the altitude of departing aircraft, in effect compromising safety and increasing noise over residents. Attached as Annexure B is a sample plot of arrival and departure tracks during Mode 9 operations demonstrating this vexing and uncalled-for practice.

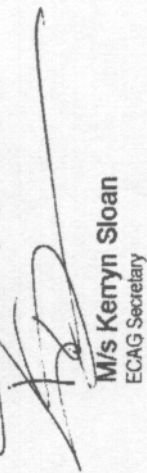
Our request is simple and has a positive impact on all Sydney electorates. We call for the Minister to ensure that aircraft arriving to land at Botany Bay do not overfly Sydney residents from Hornsby to Coogee but are sent off-shore North of Sydney at high altitudes during Mode 9 operations to make their final approach over water from the South East.

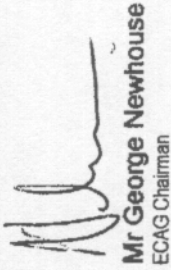
Collectively we understand the intense pressures that lobby groups apply, particularly in pre-election periods. A small number of vociferous residents north of the airport, have for far too long dictated the operational practice of Kingsford Smith Airport. They have disregarded international best practice and the design of the airport airspace. The demands of these lobby groups North of the airport which have been granted have not only hampered the effectiveness of airport operations, but have exponentially increased the crash risk and noise pollution for the majority of Sydney residents. We urge you to demonstrate the government's leadership and commitment to the safety and amenity of the majority of Sydney residents as the present situation is neither equitable or sustainable.


Mr Ben Richard
ECAG Community Representative


M/s Roma Gillam
ECAG Community Representative


Jonathan Falk
ECAG Community Representative


M/s Kerry Sloan
ECAG Secretary


Mr George Newhouse
ECAG Chairman

ANNEXURE A

Department of Transport and Regional Development *Proponent's Statement*
for the Sydney Airport Long Term Operating Plan, June 1997.

2. Airservices Australia Recommendation 2

The flight paths associated with the recommended modes of operation and shown in maps accompanying each mode, be adopted as the flight paths to be used in the Sydney Terminal Area (within 45 nautical miles of Sydney Airport) for the period of the long Term Operating Plan.

It is proposed that

The general structure and layout of the flight paths shown in the maps in the Airservices report be adopted with the amendments indicated in Chapter 3.

3. Airservices Australia Recommendation 3

Discontinue those current noise abatement requirements which mandate changing to, or continuing the use of, runways 16L and 16R for arrivals and departures (in a southerly direction) when there is up to 5 knots of downwind.

It is proposed that

Recommendation 3 be adopted.

4. Airservices Australia Recommendation 4

Adopt new runway selection criteria to:

Give preference to over-the-water operations (Mode 4) to minimise residential overflights.

Restrict the dedicated use of the east-west runway (Modes 12 and 13) to circumstances when weather requires use of these modes.

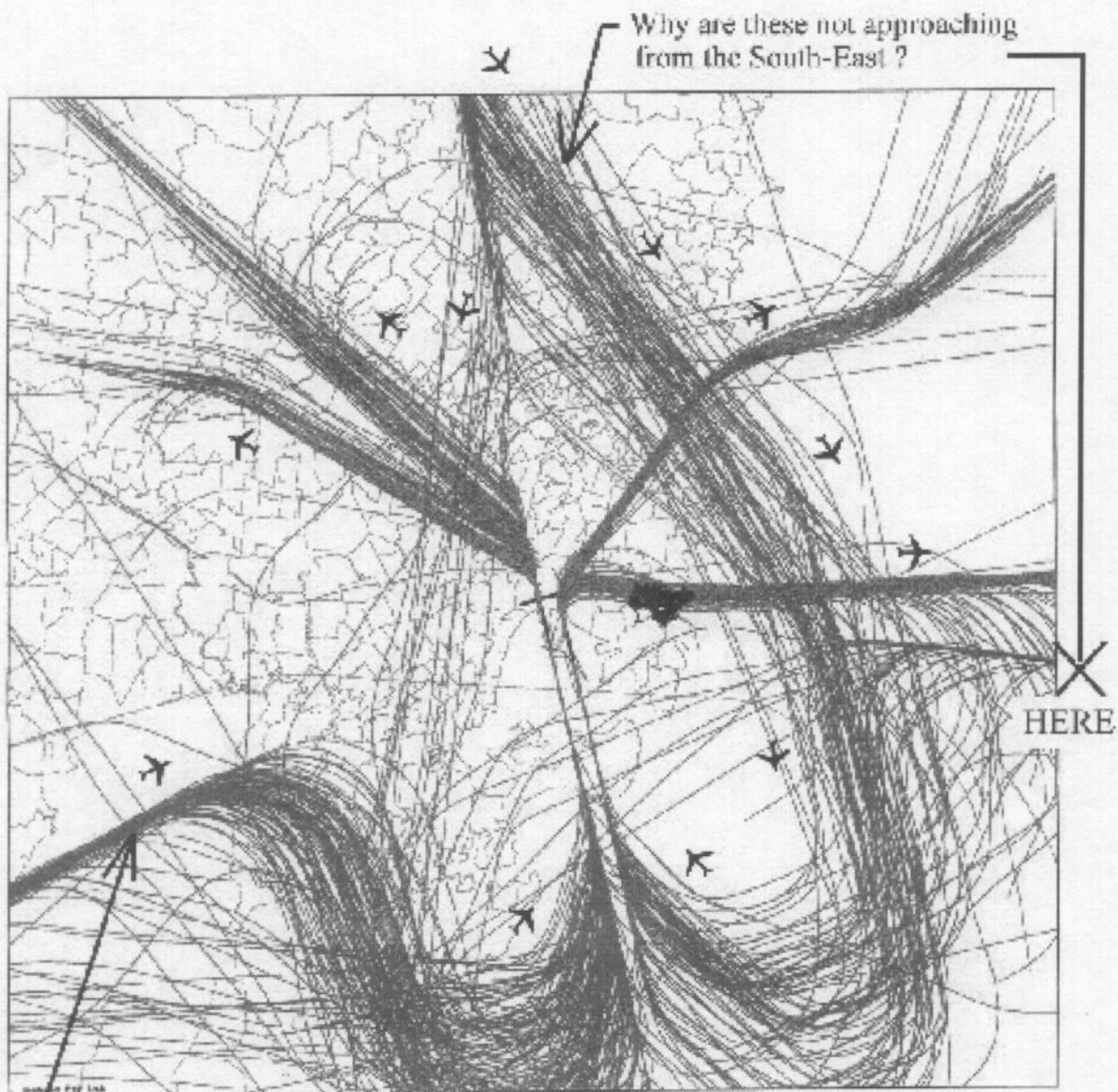
Interchange use of the other modes to ensure a fair sharing of unavoidable aircraft noise subject to weather and traffic demands.

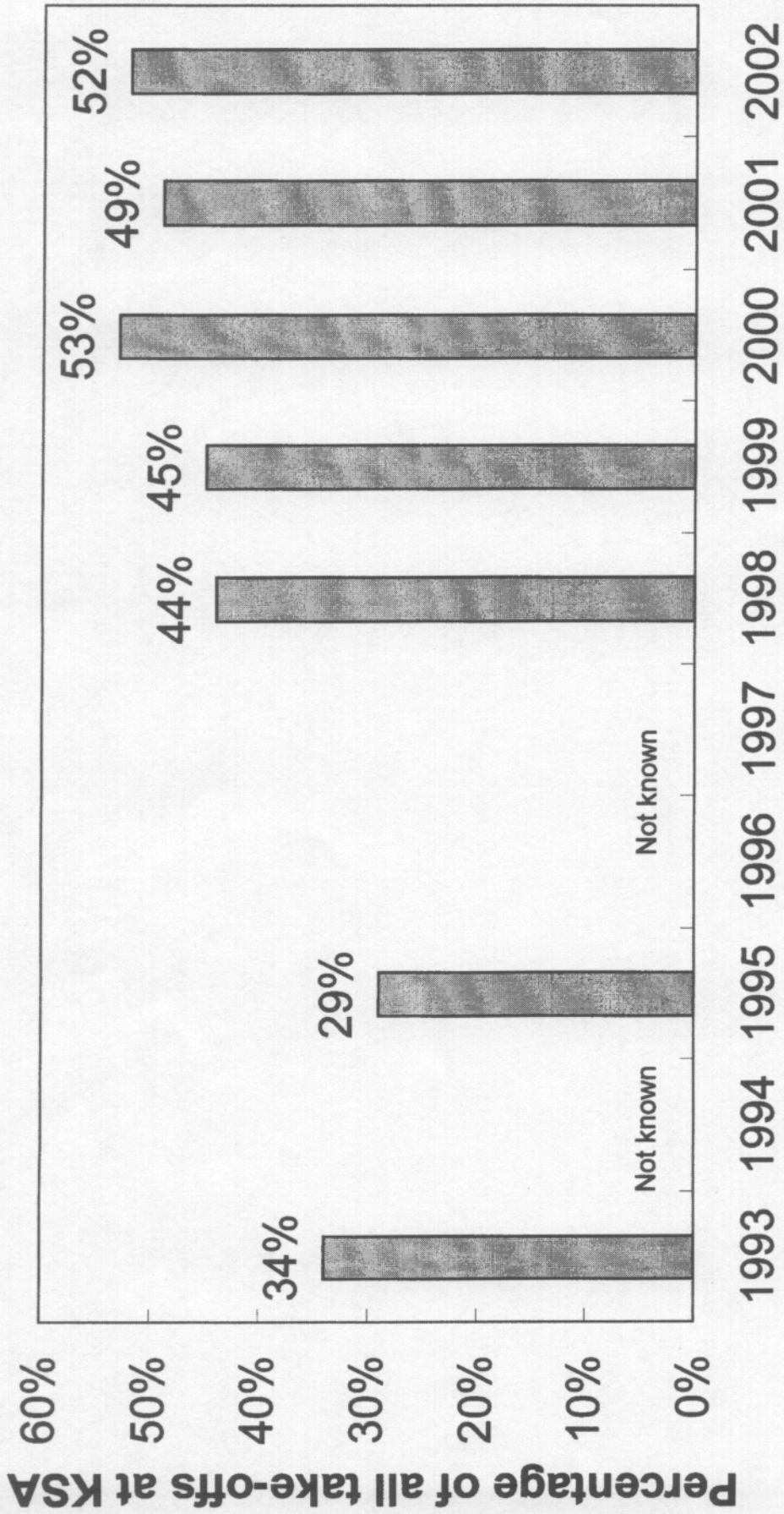
It is proposed that

Recommendation 4 be adopted.

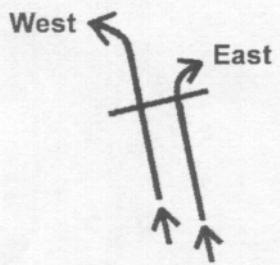
Tracks courtesy of Airservices Australia

ALL JETS ON 25/7/00 FROM 0600 - 2300
MARQIBRA INDICATED, NCM REP: 89019



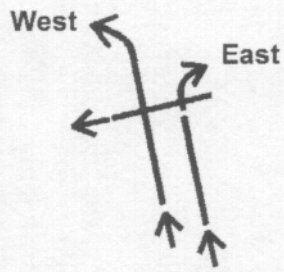


Jet Take-offs over Sydney Residents as % of all Jet Take-offs at KSA by year



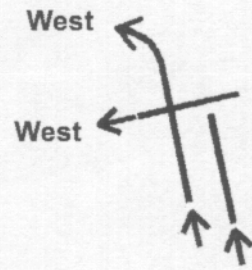
Botany Bay

Mode 9



Botany Bay

Mode 8



Botany Bay

Mode 7

Modes at KSA that put Take-offs over Residents

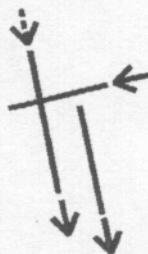
North



Botany Bay

Mode 10

North



Botany Bay

Mode 5

North



Botany Bay

Mode 14A

Modes at KSA that put take-offs over Botany Bay