

PLEASE DON'T PUBLISH MY EMAIL ADDRESS

Director, Aviation White Paper Project Office
Aviation White Paper
Department of Infrastructure, Transport, Regional Development, Communications and the Arts
GPO Box 594
CANBERRA ACT 2601

Dear Sir/Madam,

Please find attached my submission for the Aviation Green Paper:

I lodged a submission earlier this year for the Aviation White Paper, (terms of reference), which focused upon my concerns regarding the impact of aircraft noise and pollution upon Australian communities, which are located under flight paths. I responded to the following term of reference, “airport development planning processes and consultation mechanisms that consider the impact and changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation.”

I expressed my concern regarding the dire impact aircraft noise and pollution will have upon Western Sydney residents, in future, as a consequence of aircraft flying to and from Western Sydney Airport over Western Sydney. I also described how the Federal Government’s ‘share the noise policy’ is devastating many Local Government Areas in Western Sydney, including the Hills Shire in Sydney’s north-west. My submission to terms of reference for the Aviation White Paper contained many suggestions for protecting communities from the impact of aircraft noise and pollution, which, in my opinion, should be included in the Aviation White Paper when it is released in 2024.

My submission for the Aviation Green Paper continues to express my concern regarding the impact of aircraft noise and pollution upon Australian communities. I also criticise the Federal Government’s policy direction as well as strategies for dealing with the problem, which are outlined in the Green Paper. I make particular reference to Western Sydney Airport, the ‘share the noise’ policy over Western Sydney and the parallel runway at Brisbane Airport, which began operations in 2020.

I will refer first in my submission for the Aviation Green Paper to the online ‘overflight noise tool’ that was released by the Department of Infrastructure in June, which displays Western Sydney Airport’s ‘preliminary’ flight paths as well as forecast aircraft noise levels. My

comments about the 'overflight noise tool' relate to the Hills Shire in North West Sydney. I will then critique the Aviation Green Paper.

The 'overflight noise tool' reveals that flight path 'RWY05 Arrival North Day' passes over Norwest Private Hospital, which is located in the Norwest Business Park. According to the 'overflight noise tool', aircraft arriving at Western Sydney Airport will fly over Norwest Private Hospital at altitudes, which range between 17,500 feet and 13,300 feet. The 'overflight noise tool' also states that some aircraft may be lower, and residents 'may' hear a noise level of approximately 42 decibels.

The 'noise tool' stipulates the same altitudes and noise levels for various locations in the Hills Shire, including Baulkham Hills, Castle Hill, Norwest and Crestwood.

An aircraft was considered flying towards Western Sydney Airport at an altitude between 17,000 feet and 13,000 feet over Norwest Private Hospital. The standard glideslopes between 3 and 5 degrees were utilised for the calculations. (See table below, Page 3.) It is a regulatory requirement that large aircraft approach an airport from a considerable distance at a 3 to 5 degree glideslope in order to land safely due to their weight and velocity. Utilizing a 3 degree glideslope, for example, it was calculated that a plane flying at an altitude of 17,000 feet would have to land 98 kilometres from the location of Norwest Private Hospital. Furthermore, it would overshoot the runway at Western Sydney Airport by approximately 67 kilometres.

Norwest Private Hospital is approximately 30 kilometres from Western Sydney Airport. The hospital would have to be located approximately 100 kilometres away from Western Sydney Airport in order for a plane to land using a 3 degree glideslope. (See table on Page 3 for calculated values for distances utilising altitudes and 3 and 5 degree glideslopes for aircraft intending to land at Western Sydney Airport after flying over the Norwest Private Hospital.) It could not fly over Norwest Private Hospital between 13,000 and 17,000 feet. The altitude would be much lower. (See paragraphs below.)

As mentioned above, the 'overflight noise tool', states aircraft arriving at Western Sydney Airport will fly over Norwest Private Hospital at altitudes, which range between 17,500 feet and 13,300 feet. The 'noise tool' also states that some aircraft may be lower, and residents 'may' hear a noise level of approximately 42 decibels.

In reality, the calculations, which are displayed in the table on Page 3, prove aircraft would fly at an altitude between 2,000 and 5,000 feet over Norwest Private Hospital on their way to Western Sydney Airport, and the real noise impact would be in the vicinity of 70 to 75dBA, or between 83 to 87dBC. (dBC is a less attenuated reading of the 'real' noise event

a person experiences. dBC reports lower and higher frequencies of the experienced noise event than dBA.) The calculations for Norwest Private Hospital have implications for other locations in the Hills Shire. They also have implications for additional locations in Western Sydney in relation to the accuracy of aircraft noise forecasts and altitudes of aircraft, which have been released in the online ‘overflight noise tool’.

A semi-professional sound pressure level (SPL) metre was used to measure ambient noise levels in residential areas, which are located in proximity to Norwest Hospital during the daytime. Ambient noise levels were recorded, which range between 36 and 41 decibels.

The ‘online noise tool’ claims that descending aircraft flying to Western Sydney Airport over Norwest Hospital and suburbs, which are located in proximity to it like Crestwood, ‘may’ emit noise levels, which, as has already been noted, are equivalent to ambient noise levels.

Glide Slope details:

Altitude in Feet from Norwest private Hospital	Altitude in Kilometers	Distance to WSA approximately to WSA	Glide slope angle in degrees	Distance in Km that would be traveled on the ground at the rated glide slope	Distance in Km on the ground plane would land after Airport
17,000 ft.	5.1816 Km	27 Km	5	59.21 Km	59.21Km - 27Km = 32.21Km
17,000 ft.	5.1816 Km	27 Km	3	98.84 Km	98.84Km - 27Km = 71.84Km
13,000 ft.	5.1816 Km	27 Km	5	45.29 Km	45.29 Km - 27Km = 18.29Km
13,000 ft.	5.1816 Km	27 Km	3	75.6 Km	75.6Km – 27Km = 48.6

Various locations in the Hills Shire such as Baulkham Hills, Castle Hills, Kellyville, etc. are impacted by planes taking-off and landing at Sydney Airport. The Hills Shire is located approximately 32 kilometres from Sydney Airport. It is approximately the same distance from Western Sydney Airport.

Airservices Australia’s website, “Aircraft in Your Neighbourhood” reveals that aircraft fly over locations in the Hills Shire as low as 1,000 feet. Altitudes are often between 2 and 5

thousand feet. A semi-professional sound pressure level (SPL) metre was used to measure aircraft noise levels that were emitted by planes flying during the daytime to and from Sydney Airport over suburbs, which are located within proximity to Norwest Private Hospital. Aircraft noise levels were recorded up to 76 dBA.

The calculations in the table above prove that aircraft flying to Western Sydney Airport over various locations in the Hills Shire will generate noise levels, which range up to 70 decibels and above. Their altitude will range between 1,000 and 5,000 feet. Some may be higher. In other words, noise levels and altitudes of planes, which fly over the Hills Shire to Western Sydney Airport, in future, will be similar to the noise emissions of aircraft, which currently fly over the Shire to and from Sydney Airport, as they are approximately the same distance apart.

The Aviation Green Paper sets out in detail policy direction and strategies that the Australian Government will use to preside over the aviation sector over the next 25 years. The Government's policy direction and strategies will form the basis of the Aviation White Paper, when it is released in 2024. The Aviation Green Paper sets out policy direction and strategies to deal with the impact of aircraft noise and pollution upon communities, which are located under flight paths. Many elements of the policy direction, which are stipulated in the Aviation Green Paper, together with strategies regarding the management of aircraft noise, are utilised currently. These policy directions and strategies will form the basis of the aircraft noise management and community consultation section of the Aviation White Paper, when it is released in 2024. The Government's policy direction and strategies are set out in the section, which is entitled, "Airport development planning processes and consultation mechanisms." I have focused upon this section for the remainder of my submission.

Sadly, after considering what the Aviation Green Paper has to say about negating the impact of aircraft noise and pollution, I have come to the conclusion the Australian Government will fail in future to undertake the necessary policy direction and measures that are required to protect Australian communities, which are located under flight paths. In my opinion, the Australian Government does not currently undertake the measures, which are required to protect communities, and the content of the Aviation Green Paper is a signal the situation will not change for the better in future, when the Aviation White paper is released in 2024.

In my opinion, the Aviation Green Paper utilises the same platitudes, propaganda and deception which have been employed by Australian Governments and the aviation industry

over several decades in regard to the issue of controlling the impact of aircraft noise upon individuals and communities.

The following paragraphs refer to the section, which is entitled, ““Airport development planning processes and consultation mechanisms.”

Page 94, paragraph 2 states, “The Australian Government is not considering imposing any additional constraints on airports such as curfews or movement caps.” This is unacceptable. Obviously, the imposition of flight restrictions upon every Australian airport is an important strategy for controlling the impact of aircraft noise and pollution upon communities. I recommended the imposition of a curfew and flight cap upon every Australian airport in my first submission to the terms of reference for the Aviation White Paper. It is imperative that this measure be undertaken by the Australian Government.

Page 100, paragraph 2 states, “Four LFAs (Sydney, Gold Coast, Adelaide and Essendon Fields) operate under a curfew imposed by the Australian Government. Sydney Airport also operates with an hourly movement cap on flights, under Commonwealth legislation.” In my opinion, communities around Australia, which are impacted by aircraft noise and pollution from planes flying to and from airports that do not have legislated flight restrictions, are discriminated against. What is the reason some communities are protected by Federal legislation, and others are not? An inquiry is required to investigate the workings of our Parliament on this issue. The inquiry should begin with the Sydney Airport Curfew Act 1995, which set the process in motion to transfer evening flights during the curfew period at Sydney Airport between 11pm and 6am to Western Sydney Airport when it commences operations. (See link and quote below):

<https://www.legislation.gov.au/Details/C2021C00045>

“17..... Sections 13, 14 and 15 do not apply after airport at Badgerys Creek is available for night use 15”

Our political representatives have planned without compunction since the 1990’s that Western Sydney residents will be not afforded the same curfew and flight cap protections, which have been bestowed upon residents, who reside in Sydney’s eastern half and the city’s inner-west, (i.e. Leichhardt, Marrickville, etc.)

I am not advocating that the curfew and flight cap be removed from Sydney Airport. As I stated above, every Australian airport must have a curfew and flight cap. Should Western

Sydney residents suffer the great misfortune that Western Sydney Airport is approved to commence operations, they must be afforded the same protections, which residents in the eastern half of Sydney and the inner-west of the city have in relation to Sydney Airport.

6.1 Noise, Page 95 states, “How best to facilitate growing demand for aviation while managing community impacts. Effective land-use planning is the best way to reduce the impact of noise on the population while managing urban expansion...”

The Green Paper’s contention regarding ‘effective land-use planning’, ignores the impact of aircraft noise and pollution upon residential areas and development that exist prior to the imposition of flight paths from an existing airport or a new one. Hence, the devastating impact of the Coalition and Labor’s bi-partisan ‘share the noise’ policy upon several existing Local Government Areas in Western Sydney after flight paths were imposed in the late 1990’s. Blacktown, the Hills Shire, Parramatta and the Blue Mountains are examples of Western Sydney Local Government Areas, which have been badly impacted by flyovers to and from Sydney Airport as well as additional airports such as Camden and Bankstown Airports.

The Green Paper states on Page 103, paragraph 4, “One approach the Australian Government considers good practice has been the development of WSI. The Australian Government has worked with the New South Wales Government over several decades to ensure appropriate land use planning controls were in place around the Commonwealth-owned land at Badgerys Creek, even before there was a policy to build a new airport in Western Sydney to protect the future airport from encroaching incompatible development, particularly residential housing.”

The online ‘overflight noise tool’, which was released in June, as well as the recently released Environmental Impact Statement for Western Sydney Airport, reveal its ‘preliminary’ 24/7 flight paths have been imposed upon existing residential areas and development, which compose Western Sydney Local Government Areas. Many Western Sydney Local Government Areas, including Blacktown, the Hills Shire, Parramatta, the Blue Mountains, Penrith and Wollondilly will be impacted by Sydney Airport, Western Sydney Airport and additional airports like Bankstown and Camden Airports in future.

Furthermore, new housing estates, industrial estates and other forms of development are being constructed within close proximity to Western Sydney Airport. It is the bi-partisan policy of the NSW State Coalition and Labor to legislate, and approve this type of development in south-west Sydney, where Western Sydney Airport is located, with great fervour. The claim that ‘effective land-use planning is the best way to reduce the impact of noise on the population’ is pure propaganda as well as nonsense!

Paragraph 2, Page 96 states, "Airlines can ensure they land and take off at airports according to noise abatement procedures, by choosing efficient procedures to reduce noise and by deploying more advanced aircraft, which generate less noise." I went to great lengths to explain in my first submission to terms of reference for the Aviation White Paper the reasons the claim more recent aircraft make less noise is untrue, i.e. mere propaganda. Furthermore, all internal combustion engines have losses in the form of the production of heat, light and notably 'noise'. These productions are wasted energy. All large aircraft need enormous amounts of power to take-off and fly at speed, as well as at high altitudes due to their size and weight. Hence, they produce enormous volumes of noise. An A380, for example, requires 275,000 HP to fly. This is equivalent to approximately 205,000 kilowatts. This is the reason A380's and other makes of large planes can be heard from many kilometres away with the consequence impacted individuals and communities complain about the noise.

How much 'quieter' are these miraculous 'quieter' planes? Are they 20 percent quieter, 30 percent quieter, 50 percent quieter? What are they quieter than? What is their so-called 'quieter' noise being compared to? What is the comparison?

I called for an independent aircraft noise ombudsman (ANO) in my first submission to terms of reference for the Aviation White Paper. Page 97, paragraph 3 states, "...and some submissions to the Terms of Reference for the Aviation White Paper, as well as attendees at roundtables held to consult on the Terms of Reference, have called for increasing independence of the ANO by making it separate from Airservices Australia and having it report directly to the relevant minister..." The Aircraft Noise Ombudsman cannot be characterised by 'increasing independence'. They are either independent, or they are not. A truly independent Aircraft Noise Ombudsman should report, not only to the Minister, but also to a board of grassroots representatives from the community, who are not associated with or employed by the aviation industry. The grassroots representatives should not have connections with the aviation industry, or related industries, such as travel and tourism. They must not have connections with government. It is significant that the Minister, who is responsible for aviation and aircraft noise policy, is either a political representative of the Coalition or Labor Party. Therefore, they are bound by their Party's policies on the issue. Hence, they act upon the issue with prejudice. It is a great concern that the aviation and aircraft noise policies of the two major parties favour the aviation/airline industry over the welfare and quality of life of communities, which are located under flight paths. This has been the case for several decades.

As I stated in my first submission, The Aircraft Noise Ombudsman (ANO) currently comes under the auspices of Airservices Australia. Thus their status is not independent. This is

untenable. The Aircraft Noise Ombudsman must be fully qualified in the field. They must be independent from State and Federal Governments and political manipulation. They must not be co-employed by the aviation industry or associated industries while in office.

Page 100, paragraph 3 states, “Noise sharing arrangements...apply to a number of airports around Australia... Formal noise sharing arrangements currently apply at Sydney Airport through a Long-Term Operating Plan (LTOP). The LTOP was developed in the mid-1990’s in response to community pressure to share the noise generated by Sydney Airport.” I went to great lengths in my first submission to terms of reference for the Aviation White Paper to explain that so-called ‘noise sharing’ spreads the aircraft noise problem to additional communities, and consequently, causes many more people to suffer. This is what has happened to residents in the Hills Shire in north-west Sydney, for example. They are ‘long-term’ victims of the Long-Term Operating Plan (LTOP) Noise sharing is a failed strategy!

Noise sharing and second airports like Western Sydney Airport are adopted when an Environmental Impact Statement (EIS), which has been approved by the Federal Government, provides aircraft noise forecasts for a new airport project that have failed to forecast correct levels of aircraft noise over impacted locations by understating them. The consequence is community outrage, and mass demand for solutions. Noise sharing and second airports are also adopted when an EIS fails to identify the number of locations that will be impacted, and stipulates higher altitudes of planes than occur in situ. Hence, the Coalition and Labor adopted the policies of ‘share the noise’ as well as Western Sydney Airport and its 24/7 operations when community outrage broke out as a consequence of the impact of ‘unanticipated’ levels of aircraft noise after the third runway began operations at Sydney Airport in 1994.

Page 105 provides a definition of the very significant LA_{max}. LA_{max} is important, because it measures the sound an individual hears as a plane flies overhead. It is a measurement, which relates to what the human ear experiences in real life.

Paragraph 4 on Page 105 states, “Another noise metric used in the context of aircraft noise are ‘sound level’ measures. Sound level measures offer a range of different options, such as sound level equivalent (LA_{eq}) and maximum sound (LA_{max}) based on energy averages of sound levels of noise sources. These measures can offer a more realistic and more comprehensible portrayal of noise for the community.” (Note the use of the words, ‘noise metric’, and ‘averages’, which I refer to in the paragraphs below.)

In my opinion, the Aviation Green Paper’s definition of LA_{max} must be disputed. Airservices Australia has adopted the Civil Navigation Services Organisation (CANSO), 2013 definition of LA_{max}. CANSO defines LA_{max} in the following manner: Maximum Noise

Levels (LAmax, PNLmax) (Perceived Noise Level). The noise level is assessed in terms of the instantaneous maximum sound level that is reached during an over-flight. In simple terms, LAmax refers to the maximum sound level reached, in decibels for a noise event. The definition of LAmax **SHOULD NOT INCLUDE THE WORD 'AVERAGE'**! An average is derived through calculation. Maximum is a realised value. An average value is not a realised value. Maximum is a value, which exists in the real world, unlike an average value.

The observation that the Aviation Green Paper has provided a questionable definition of LAmax destroys confidence in the integrity and accuracy of its processes and content. The same lack of confidence can be applied to the Aviation White Paper, when it is released in 2024.

As I explained in my submission to terms of reference for the Aviation White Paper, a justified concern exists in Australia and other countries like the United States of America and the United Kingdom, as well European countries that current methods of calculating aircraft noise forecasts for airport projects are profoundly flawed. These methods are often referred to as 'noise metrics'. Significantly, the Australian Government permits consultants for Environmental Impact Statements to employ 'noise metrics' in order to calculate aircraft noise forecasts for airport projects like Western Sydney Airport. Aircraft noise assessments, which are calculated by employing 'noise metrics', are 'computer generated', and based upon averages. Average noise assessments are always lower than maximum ones. Most importantly, aircraft noise forecasts, which are provided in Environmental Impact Statements (EIS) must always be stated in terms of LAmax.

As I explained in my submission to the terms of reference for the Aviation White Paper, an independent noise study was prepared for Western Sydney Airport, which was released in 2019. The study is entitled, "Assessment Of Measured Aircraft Noise Levels Under The Existing Flight Paths of Sydney Kingsford Smith Airport With Reference To Western Sydney Airport."

This document challenges the noise assessments, which were published in the 2015/2016 Environmental Impact Statement (EIS) for Western Sydney Airport. Most importantly, the independent noise study utilised the noise emissions of real planes as they flew overhead, i.e. LAmax, to calculate aircraft noise forecasts, which would be emitted by aircraft as they flew to and from Western Sydney Airport. The independent noise study for Western Sydney Airport has been ignored by both the former Federal Coalition Government and now by the Federal Labor Government.

The independent noise study indicates that aircraft noise levels would be 3 to 4 times louder over Blacktown and Blaxland respectively than the noise assessments, which are

provided in the 2015/16 EIS, with implications for other locations in Western Sydney. (It must be noted the Federal Government approved Western Sydney Airport and its 24/7 operations based upon the 2015/16 EIS). (The study can be found on the Blue Mountains Council website.)

6.2 Community consultation mechanisms, Page 111 states, “The Airports Act requires community consultation for planning documents: Master Plans and MDP for when they propose large projects where costs are above a monetary threshold or impacts are significant...The Australian Government is seeking greater airport-led consultation...” Brisbane residents correctly describe community consultation regarding the impact of aircraft noise and pollution upon communities in relation to existing and new airport projects as ‘community consultation engagement theatre.’”

The Coalition and Labor lost three seats between them to the Greens at the Federal Election in 2022 as a consequence of community outrage at the level of ‘unanticipated’ aircraft noise after the new 24/7 parallel runway began operations at Brisbane Airport in 2020. The community was also outraged that many suburbs were not predicted to be impacted. Residents, who reside up to 40 kilometres away from the airport, are complaining about the noise. The Greens have put up 3 Private Member’s Bills in Federal Parliament, one in 2022 and two in 2023, to impose a flight cap and curfew upon Brisbane Airport, which the Coalition and Labor have not supported. The aircraft noise problem has not been solved, and the runway continues to operate, regardless of the community outcry. This is something, which Western Sydney residents should note, as they stand to be impacted by Western Sydney Airport and its 24/7 operations in the near future. And, yes, Brisbane residents would agree that community consultation regarding the impact of aircraft noise, which relates to existing airports as well as new airport projects, can accurately be described by the following words, ‘scam’, ‘snow job’, ‘smoke and mirrors’ and ‘rigged’. The aviation/airline industry and its political backers always get their way despite the objection of the community.

I will take advantage of the opportunity to utilise my submission for the Aviation Green Paper as a means of informing individuals, who read it, about a current situation, which relates to the flight restricted Sydney airport as well as Western Sydney Airport and its unrestricted flight operations. The Australian Financial Review published an article on the 15th of November 2023 regarding the former Prime Minister, Scott Morrison and his concern about the impact of aircraft noise generated by aircraft movements during the curfew period at Sydney Airport over Kurnell in his southern Sydney Electorate of Cook. Please see headline, link and quotes below:

“Scott Morrison emerges to fight early morning Sydney Airport noise”

<https://www.afr.com/companies/transport/scott-morrison-emerges-to-fight-early-morning-sydney-airport-noise-20231114-p5ejw9?fbclid=IwAR3ScXggcHZOA-oYLIVy3oewC39sK-BY1PYEi1VclVsoHnRqv25l9t8snuY>

QUOTES:

“In his letter to Infrastructure Minister Catherine King, Mr Morrison wrote that the residents of Kurnell, in his electorate of Cook in Sydney’s south, were “unfairly denied the protections” of the Sydney Airport curfew.”

“The curfew prevents flights after 11pm and before 6pm. There have been between 10 and 18 flights every night under the exemption.”

“...his letter reads, adding that legal advice sought from concluded that “the dispensations contravene relevant provisions of all three legislative instruments and subverts the rightful and lawful role of parliament”.

“In response, the Infrastructure Department has launched a review of the special allowance and have flagged to the three carriers that there is a “realistic” chance it will be scrapped...”

“Mr Morrison told The Australian Financial Review that he had not sought to publicise his intervention.”

“However, in his letter, Mr Morrison said the timetable for Western Sydney Airport’s opening had been “established prior to the pandemic and any new business generated temporarily under dispensation agreements cannot be used as grounds to continue the dispensation, when the exceptional circumstances that enabled the dispensation are no longer present”.

It is significant that the construction of the flight unrestricted Western Sydney Airport progressed voraciously during Mr Morrison’s time as Prime Minister. In fact, he turned the first sod on the 24th of September 2018. The Financial Review Article reveals that he takes umbrage when aircraft fly over his Electorate during the curfew period between 11 pm and 6am at Sydney Airport. Kurnell currently has approximately 2,500 residents.

Approximately two and a half million Western Sydney residents stand to be impacted by 24/7 aircraft noise and pollution as planes fly to and from Western Sydney Airport when it begins operations in 2026. In my opinion, articles like the one to which I have referred, and

other articles like it, which have been published in the past and more recently, should prompt every Western Sydney resident to realise they have a great deal to consider when it comes to Western Sydney Airport.

Western Sydney Airport is due to commence operations at the end of 2026. As I stated in my first submission to terms of reference for the Aviation White Paper, Western Sydney Airport and its 24/7 operations should not be given approval to commence operations. The Coalition and Labor should abandon the policy of the airport, before it is too late. They risk having a humanitarian, environmental and political catastrophe on their hands in future.

As I have stated above, I have suggested numerous strategies for controlling the impact of aircraft noise and pollution upon communities in my submission to terms of reference for the Aviation White Paper earlier this year, which, in my opinion, should be included in the Aviation White Paper, when it is released in 2024. They have not been addressed by the Aviation Green Paper. Nevertheless, I have added three more strategies, which, in my opinion, should be included in the Aviation White Paper's final release:

1. The instigation of a Royal Commission, which utilises wide terms of reference to investigate the Australian Government's current aviation and aircraft noise and pollution policies. The envisaged Royal Commission should also focus on the policies, which the Coalition and Labor have put in place over the last 35 years, with emphasis on their bi-partisan nature.
2. The instigation of Royal Commissions, which utilise wide terms of reference to investigate every procedure and process, which relate to existing and new Australian Airport projects over the last 30 years. Examples of airport projects, which should be the subject of a Royal Commission include Western Sydney Airport, the new parallel runway at Brisbane Airport, the new runway at Sunshine Coast Airport, the Gold Coast Instrumental Landing System (ILS), and the yet to be constructed third runway at Melbourne Airport, and the runway at Perth Airport.

The third runway at Sydney Airport should also be the subject of a Royal Commission, because it has had a major impact on Western Sydney residents. The fallout amongst local communities within proximity to Sydney Airport over the impact of 'unanticipated' aircraft noise, which is emitted by planes taking off and landing on the third runway at Sydney Airport, has resulted in the construction of Western Sydney Airport and its 24/7 operations, as well as the 'Long Term Operating Plan' (LTOP), in order to transfer aircraft noise from the eastern half of Sydney and the inner-west of the city to Western Sydney.

The envisaged Royal Commissions should investigate the role political parties have undertaken in relation to existing and new airport projects. The roles and actions of former and current politicians, consultants, corporations, as well as individuals should also be a focus. Airservices Australia as well as past and current Airservices Amendment Bills should also be scrutinised.

3. The imposition of legislated restrictions regarding the maximum noise aircraft are permitted to emit over residential and environmentally sensitive areas. (Restrictions of this nature do not currently exist.) The World Health Organisation (WHO) recommends “45 dB L den for aircraft noise during the daytime,” and “40 dB L for aircraft noise during the evening.” (See link below.)

https://cdn.who.int/media/docs/default-source/who-compendium-on-health-and-environment/who_compendium_noise_01042022.pdf?sfvrsn=bc371498_3

CONCLUSION:

I have focused closely on the section of the Aviation Green Paper, which is entitled, “Airport development planning processes and consultation mechanisms.” In my opinion, the content of this section does not instil confidence the Federal Government intends to pursue the correct policy direction, or undertake the necessary measures that are required to protect communities throughout Australia, which are located under flight paths, from the impact of aircraft noise and pollution. Nor does it inspire confidence the Federal Government intends to employ honest and effective ‘consultation mechanisms.’

Therefore, I am not confident the Aviation White Paper will include the necessary provisions regarding the policy direction and strategies that are required to protect communities around Australia, which are located under flight paths, from the impact of aircraft noise and pollution when it is released in 2024.

I strongly suggest the following provisions be included in the Aviation White Paper when it is released in 2024:

1. The instigation of a Royal Commission with wide terms of reference, which focuses upon the Federal Government’s current aviation industry, as well as its aircraft noise and pollution policies. The envisaged Royal Commission should also focus upon past policies and their bi-partisan nature that extend over a period of 35 years. It should

also focus on the component of the 1995 Sydney Airport Curfew Act, which discriminates against Western Sydney residents.

2. The instigation of Royal Commissions with wide terms of reference, which focus upon existing and new airport projects.
3. The imposition of limits upon the maximum noise aircraft are permitted to make over residential areas and environmentally sensitive areas.
4. The adoption of the World Health Organisation's (WHO) recommendations for daytime and evening aircraft noise.

Finally, there should not be a landlocked international or freight airport in Western Sydney. Every aircraft take-off and landing in Sydney should take place over Botany Bay. Aircraft should not fly over residential areas, or environmentally sensitive areas like the Blue Mountains World Heritage Area. The Federal Government must cease the construction of Western Sydney Airport immediately. This airport must never be given approval to commence operations. Furthermore, the Federal Government's 'share the noise' policy must cease over the Hills Shire and Western Sydney.

Thank you for providing me with the opportunity to lodge a submission for the Aviation Green Paper.

Yours Sincerely,

Yvonne Reynolds