

Committee Secretary  
Senate Standing Committees on Rural and  
Regional Affairs and Transport  
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30 April 2024  
Ref No: F2013/00109

Dear Sir/Madam,

**RE: Parliamentary Inquiry into the impact and mitigation of aircraft noise**

Council is pleased to provide a submission to the Rural and Regional Affairs and Transport References Committee for the inquiry into the impact and mitigation of aircraft noise on residents and business in capital cities and regional towns. Council notes the terms of reference of the Inquiry cover the following:

- a) the effect of aircraft noise on amenity, physical and mental wellbeing and everyday life of residents;
- b) the effect of aircraft noise on small business;
- c) any proposals for the mitigation and limitation of aircraft noise, including flight curfews, changes to flight paths and alternatives to air travel;
- d) any barriers to the mitigation and limitation of aircraft noise; and
- e) any other related matters.

Council has reviewed the terms of reference, and this submission outlines a number of issues that are relevant to Randwick City that Council would like to see considered as part of this inquiry.

The Randwick Local Government Area (LGA), situated in close proximity to Sydney Airport, contains a number of suburbs that experience disruption from aircraft noise impacts. This noise pollution has become an increasing concern for the residents, at times negatively affecting their daily lives.

This submission aims to highlight the adverse effects of aircraft noise pollution on the health, well-being, and quality of life of individuals residing in the affected areas.

**Compliance with Noise sharing Long Term Operating Plan targets**

The Long Term Operating Plan (LTOP) for Sydney Airport was established to address community concerns about aircraft noise by implementing fair noise-sharing arrangements. It was developed following an extensive community consultation process during 1996 and 1997 in response to growing community pressure in the mid-1990s.

Under the LTOP, Airservices Australia is required to prioritise flight paths over water or non-residential areas to minimise noise impacts. Where overflight of residential areas cannot be avoided, the Plan seeks to safely ensure balanced noise sharing of the remaining air traffic over

the surrounding communities. The LTOP includes noise-sharing targets, and mandates regular monitoring and reporting. Under this plan, the fundamental principle of the Long term Operating Plan is to optimise flights over Botany Bay (55% to the south) with the remaining flights to be shared between the other three directions as equally as operationally feasible. Under the LTOP, the Easterly direction (in which the Randwick LGA is located) was allocated 13% of flights.

When The LTOP was last reviewed in 2005, following years of operation, it was found that Easterly movements exceeded the allocated target especially during winter and early spring due to weather, wind or other operation conditions. This coincides with technical data that indicates that seasonal patterns generally account for a variation of some 5% in runway end usage. While adjustments were made based on community feedback, there have been no subsequent reviews since that time.

However, operational statistics indicate that the LTOP Targets are constantly being exceeded for the North and the East while not being reached for the South and the West ( [Sydney Airport operational statistics – AsA National Insightfull \(airservicesaustralia.com\)](#)). Accordingly, there are several reasons why a thorough review of the LTOP is warranted:

1. Changing Circumstances: Since its inception, there have been significant changes in air traffic, population density and distribution, people working from home and urban development around Sydney Airport. These shifts may necessitate adjustments to the LTOP to ensure it remains effective.
2. Community Feedback: Community expectations and concerns evolve over time. A review would allow for updated community input, ensuring that the LTOP aligns with current needs and priorities.
3. New Western Sydney Airport: The Western Sydney International Airport (WSA) is currently under construction and expected to begin operations in 2026. While the WSA is a separate airport, its operations could impact Sydney Airport's airspace management and flight paths, which in turn will impact upon the LTOP.
4. Noise Impact: Despite efforts to share noise fairly, some residential areas still experience significant aircraft noise. A review should identify areas where noise-sharing arrangements need improvement.
5. Safety and Capacity: Balancing noise sharing with safety and capacity constraints is acknowledged. A review should explore innovative solutions that maintain safety while minimising noise impact and achieving more balanced noise sharing.
6. Technological Advances: Advances in aviation technology may allow for more precise flight paths and noise reduction. A review should assess how these advancements can be integrated into the LTOP.
7. Environmental Considerations: The LTOP should align with environmental goals and priorities, such as minimising emissions and protecting natural habitats.
8. International Best Practices: Comparing the LTOP to noise management plans at other airports worldwide can provide insights and inform potential improvements.

The LTOP targets should provide confidence to the community that the noise sharing arrangements will be adhered to and complied with to the extent possible. However, in reality, the ongoing non-compliance and lack of review since 2005 undermines the value and relevance of the LTOP.

**Recommendation:** that a thorough review of the LTOP be undertaken to ensure that it remains relevant, equitable, and responsive to the changing urban dynamics and circumstances around Sydney Airport.

### **Flight curfews and the Assessment and impact of Curfew dispensations.**

Council notes that, during the COVID-19 pandemic, many Curfew dispensations were approved essentially in response to the *exceptional* circumstances created by the social and travel restrictions on Australian aviation, particularly in the freight and logistics sectors. These 'exceptional circumstances' justified the authorisation of additional freight movements at Sydney Airport during the curfew period and the use of larger aircraft.

In November 2023, Randwick Council was invited to make a submission in relation to the proposed continuation of curfew dispensation granted to a number of commercial aviation operators including Qantas, Team Global Express and Pionair Australia. Council provided its submission to the Department on 17 November 2023, objecting to the continuation of the curfew dispensation for commercial operators given that COVID was no longer an issue and requested that no further dispensation or extensions to dispensation should be approved.

On the 2 February 2024, Council was advised by the Sydney Airport Community Forum (SACF) Secretariat that the dispensations provided to freight airlines had been revoked effective immediately. Notwithstanding this positive outcome, Council is recently aware that curfew dispensation continues to be approved under the Sydney Airport Curfew Act 1995 to allow Sydney Airport's parallel north-south runway to be used between 11pm and 6am for no more than 12 nights until 30 June 2024 while maintenance work is undertaken on the main north-south runway on these nights. In effect a number of overnight freight flights will be allowed to operate during the curfew during this period. The potential for noise disruption to local residents will still occur notwithstanding the revocation of the curfew dispensations. As such, aircraft noise will continue to be the issue of most concern to residents, particularly over the night-time when sleep is disturbed.

**Recommendation:** that the Department of Infrastructure, Transport, Regional Development Communications and the Arts provide clarity on the exceptional circumstances criteria for curfew dispensations and reassurance that curfew dispensation for freight flights have been revoked and ceased.

### **Notifications of projects and programs which may affect aircraft noise**

In November 2023, Council received communications from several concerned residents regarding the proposed changes to departure paths from Runways 16L and 16R proposed by Air Services. The fact sheet provided by Airservices Australia in support of the proposed new departure paths were considered deficient for the following reasons:

- The noise modelling data showed predicted noise changes over residential areas located to the south of Botany Bay but did not include noise modelling data for residential areas located to the north and east of Botany Bay. Local residents of La Perouse, a residential suburb of Randwick City whose residents have constantly raised complaints about aircraft noise, have requested that full and detailed noise modelling and impacts to the community for all the changes proposed for Runway 16L should be undertaken and provided to the La Perouse community. This information would give confidence and surety regarding the predicted aircraft noise impacts from the proposed changes.
- The area covered by the 16L noise corridor includes a wide swathe of La Perouse up to the suburb of Little Bay. The Standard Instrument Departure (SID) procedures accompanying the proposed runway departure changes state that aircraft may fly differently within these corridors for a range of reasons, including aircraft performance (e.g., speed and weight) and navigation systems. Aircraft may also deviate from flight paths within the flight corridor for a range of reasons, including weather and operation requirements, or at the approval of Air Traffic Control. It was unclear from the fact sheet as to what "operational requirements" mean. Concern has been raised that it may include arbitrary economic decisions about fuel consumption and flight schedules that would lead to flight deviations closer to, or above, residential areas that would generate greater aircraft noise pollution.

- No noise modelling data for La Perouse, a residential suburb of Randwick City whose residents have constantly raised complaints about aircraft noise, was provided in the fact sheet in support of the proposed new departure path, whereas noise modelling for areas south of Botany Bay were shown. As such, no empirical evidence has been provided to support the claim that the proposed new departure path for Runway 16L would reduce aircraft noise impacts for La Perouse.

Given these shortcomings, Council requests that noise data and modelling should be provided in a reliable and completed form and communicated to all affected residents in an equitable manner before these changes are approved by Air Services. Providing equitable, and clear communications is essential to ensure affected residents feel that they are being heard and that their opinions matter.

**Recommendation:** that relevant authorities and stakeholders take proactive measures to address the issue of aircraft noise pollution in Randwick including:

- Providing communication that is easy for residents to understand including clear data and diagrams of predicted impact types and their duration.
- Engaging with the community to measure and gather feedback and prioritise solutions that address the specific concerns of Randwick residents

If you have any questions regarding issues raised in this submission, please contact David Ongkili Coordinator Strategic Planning on 9093 6798.

Yours sincerely



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