

Belrose. N.S.W. 2085

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10 JUN 2008  
(Canberra Office)

The Hon Anthony Albanese MP  
Minister for Infrastructure,  
Transport, Regional Development and Local Government.

Dear Sir,

**A National Aviation Policy Statement**  
**Issues Paper April 2008**

Thank you for the opportunity to comment on the Issues Paper for this important stage towards the development of a reasonable policy document for the implementation of controls for all aspects of the future Aviation Industry in Australia.

We consider that the five themes in this paper are appropriate for the consideration of the essential issues affecting people within the industry and the issues impacting on people outside the industry, however we have added some subtitles that should be addressed. (Review of flight paths, Respite times from aircraft.)

We have lived at Belrose, NSW for 35 years and have gradually been impacted by the increase in aircraft from Sydney Airport, Bankstown Airport, sea planes, emergency flights, and military aircraft together with the increase in joy flights, helicopter flights and small fixed wings aircraft.

A significant change, which increased the impact on the Belrose community, occurred when a decision was made in 1996 to change the flight path for arrivals and departures from Sydney Airport. Some of the changes included aircraft flying over and turning over Belrose. This prolongs the noise impact on this community.

With the future increase in aviation this impact will increase.

We have registered many complaints over the last twelve and half years and have put in submissions on the review of flight paths e.g. the development of the Long Term Operating Plan for Sydney Airport, Sydney Metropolitan Strategy Plan.

We have come to the conclusion that there is very little coordination of Planning in the Sydney Basin area. Complaints are only listed, and concerns are not addressed.

We consider that the Sydney Airport Community Forum is ineffective in dealing with community issues. We attended one of the Forum's meetings in 2003 where we had submitted a particular complaint. We were advised that we were unable to make a submission unless we put the complaint through a community representative. There is no community representative from the Northern Beaches area and our issues on the aircraft impact were reluctantly presented by a representative from the Upper North Shore (Turrumurra) area. After taking 12 months to have our issues listed, the Forum found that as we were only community residents, no serious consideration was given to our issues. In 2004 we received a letter from the forum advising they would give us a portable noise monitoring unit, this did not happen. A private company engaged by SACF came on 2 occasions for a short time; the consultant communicated with the air traffic unit before she arrived and during the time she was at our address, we were advised by the consultant that aircraft was not able to be directed over our area. We received a report advising that 19 planes that came over Wyatt Ave, Belrose, yet the tracking sheet showed only 2 planes came over Wyatt Ave. Three conflicting lots of information.

We still find on the Community Forum Web site that there are no representatives for the Northern Beaches area. We have drawn this to the attention of Sydney Airport Community Forum and the Federal Member for McKellar, yet no action has been taken.

We consider that it is essential that this National Aviation Policy Statement be developed in meaningful consultation with all residents that are under existing and proposed flight paths in the Sydney basin including the northern beaches area.

### 1. Aviation Industry:

We agree with the list of issues in the document.

### 2. Infrastructure:

The implication of expanded international operations at Secondary Airports will need to be undertaken in meaningful consultation with the residents in the relevant Local Government areas including the areas impacted by flight paths. (Including the northern beaches area), The infrastructure should include land transport necessary to provide effective and efficient transport for all travellers.

#### Land use planning and development approvals at Major Airports;

We consider that the policy should refer to planning and development approvals at all airports, including facilities for sea planes and heliports.

It is essential that planning for aviation and associated facilities be undertaken with meaningful consultation with the surrounding population, Local Government and State Government. Regional Planning. This is usually undertaken by the State Government in conjunction with Local Government and needs to include aviation and associated facilities. Transport is a major issue that is not often successfully integrated with Regional Planning.

The NSW State Planning Department is currently undertaking a Strategy for the Greater Sydney Metropolitan area. It is essential that the development of an Aviation Policy should have significant input from State Planning, which has had consultation with the community.

We consider that the community should have been advised by mail, media (e.g. Mail outs, local newspaper) and workshops arranged with interested individuals and interested groups, so the community is aware of this issues paper.

Effective dialogue between airport operators and local communities can only be achieved by first gaining the confidence of the communities through developing the Aviation Policy with meaningful consultation with the communities adversely impacted by aircraft.

We note that the Standard used for Noise is not appropriate for the noise impact on residential areas.

We consider that it is imperative that a new Standard be developed within the next 12 months; in consultation with the local communities involved with the development of the Aviation policy.

Noise is a major issue for residents on flight paths. The noise of more frequent flights causes a significant impact in comparison to the infrequent flights that occurred before the change in 1996

We are often outdoors and with the interruption and irritation of constant flights, this causes a significant adverse affect on residential living. When indoors the noise of aircraft is unacceptable, we have interference to our television as well as vibration from the aircraft and at early hours of the morning (1.2.3. 4. am) from very noisy emergency aircraft which has an adverse affect on sleeping.

The flights over Belrose are not only from the Sydney Airport, they come from Bankstown and other airports together with sea planes, small fixed wing, millarty, joy flights and helicopters and emergency flights.

In addition to the increased frequency of flights, the current Operation Plan involves aircraft departures and arrivals from Mascot as well as aircraft turning at Belrose to make the approach or departure from the airport. This turning movement over a residential area is unacceptable.

We consider that if there are so many problems and restrictions to operate a major airport at the existing facility at Mascot, then it is essential to commence the investment in locating and developing a major facility in an appropriate area. The longer that this is delayed the harder it will be to find a suitable location.

The issues paper should include a section on developing a method to address the various parameters where a sensitivity analysis will show that the level of activity is unacceptable. This analysis needs to be a combination of economic and social impacts.

This analysis should be used for future estimates of activities so that planning can utilise this analysis to address the unacceptable impacts of placing more activities at existing facilities and start planning for other locations. (e.g. Canberra area)

All of these assessments need to be undertaken with meaningful consultation with the communities. This should involve making the communities aware of any proposals and workshops with interested communities. This will be essential for the review of the Sydney Airport Master Plan in 2009.

#### **Air Traffic Management;**

We consider that it is essential that the Australian Government immediately endorse a National plan for the development of the future air traffic management.

Without this we cannot see how effective safety and border control can be achieved.

Please refer to sections, Review of flight paths and Respite Times from Aircraft below in this submission.

### **3. Aviation Safety.**

We consider that it is essential that the current tensions between CASA and ATSB be addressed so that the travelling public can have confidence in the safety of air travel.

### **4. Customer and Community Protection.**

#### **Review of flight paths.**

The issues do not include a separate section on reviewing flight paths.

This is an essential process in addressing the impact of aircraft and should be included as a part of any sensitivity analysis.

Why are there not more flight paths over the ocean? If we are not at war there is no reason why this area could not be freed up, this would alleviate noise and frequency over homes.

#### **Aviation emissions and climate change;**

In addition to the issues listed we consider that the dumping of aircraft fuel needs to be addressed.

As the approach and departure paths are located over residential areas, we consider that it is essential that the community is assured that the dumping of fuel does not take place over Residential areas or National Parks.

#### **Aircraft Noise;**

We consider that the existing curfews at the four major airports be maintained from 11:00pm to 6:00am. Further we consider that other airports in the Greater Sydney Region implement the same curfew.

We consider areas that have flight paths over homes during the day time should not be inconvenienced at night time by emergency aircraft as they need respite during night time.

We consider that Local Government should play a greater role in aircraft noise management.

This can only be achieved if the Australian Government endorses a meaningful consultation policy with the agreement of Local Government, particularly with the Local Government Associations and the Australian Local Government Association.

#### **Respite Times from Aircraft.**

Under the current operation plan respite times are in force. This needs to continue. Total aircraft noise respite for the community, needs to be adhered to. We have flight paths for arrivals, departures, sea planes, small fixed wing, millarty, joy flights and helicopters and emergency flights using Belrose airspace sometimes all at the same time; therefore respite from all aircraft over areas having this amount of traffic is needed.

#### **Techniques on the sharing information on aircraft noise;**

The existing techniques are ineffective and a total new approach needs to be developed.

With the introduction of private investment in airports there has been no meaningful control over the social impacts of the existing and increased activities at airports including the adverse impacts in the surrounding communities and communities under the flight paths.

The review and development of Operating management Plans need to be developed in similar terms to Environmental Management Plans, to ensure that the operations of the airports address the social impacts. These management plans should include the establishment of community monitoring committees who have authority to have direct communication with a responsible senior government staff member when it is necessary to advise the government of any adverse issues occurring through the operations of the airport. The membership of this Monitoring Committee should be people from the total Sydney area, including the Northern Beaches area. The Membership of the Sydney Airport Community Forum does not have any representative/s from the northern beaches area; we therefore have no one to submit our issues to. This forum has become a Government subcommittee not a COMMUNITY forum.

In the Sydney area it is essential that the operations of all airports, sea plane facilities and heliports are controlled through appropriate Management Plans that have been developed with meaningful consultation with the relevant Local communities and Local Government authorities.

With regard to the current noise enquiry and complaint services, there needs to be an immediate review and implementation of a service where the relevant communities have confidence that complaints are listed and investigated so that regular reviews of the Management Plans can be achieved to address the adverse impacts on the communities.

The community should be able to address their issues directly to the Monitoring Committee. Any commercial arrangements between the Australian Government and Private Organisations operating airports must include the Management Plans and a responsible senior staff member appointed to the Monitoring Committee.

#### 5. Aviation Security.

We agree with all the issues listed.

We would appreciate an acknowledgement that the issues contained in this submission will be considered in the development of the Aviation Policy.

We would be pleased to provide further information if required to assist in the development of an appropriate and meaningful policy that will acknowledge the importance of addressing adverse impacts on communities by involving communities in the Operating Plans.

Yours Sincerely,




Ron and Cynthia Patton