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**From:** [REDACTED]  
**Sent:** Sunday, 5 March 2023 6:43 PM  
**To:** Aviation White Paper  
**Subject:** Submission - Aviation White Paper 2023  
**Attachments:** snip air service.JPG

We submit the following: **Please ensure that our names and private contact details are held as confidential.**

In relation to the White Paper terms of reference ("**Other significant issues raised during the consultation process**" and "**changing nature of aircraft noise and related expectations on the role of noise sharing and noise mitigation**") we submit the following :

**AIRCRAFT NOISE.**

We refer more broadly to Brisbane Airport expansion as an overall example of uncontrolled aviation noise. (We have family unhappily trying to live underneath invasive, unrelenting jet engine noise).

(a) The "changing nature of aircraft noise". An important point indicating how aircraft noise is increasingly destroying large communities whose quality of life are being controlled and in thousands of cases, decimated by neighbouring airports.

(b) "Related expectations on the role of noise sharing and mitigation" Straight out of the Air Services playbook (*see attached document dot point 1.*)

In relation to (b) above. Astonishing language similarity with dot point 1. in the attached Air Services document, "Proposal to Increase Allowable Tailwind at Brisbane Airport" - Key Messages". Messages that attempt to influence decision makers that Brisbane Airport's business model is to receive priority over the lives of those they damage in the process.

The White Paper omits to address public dissatisfaction with non-alleviation of aircraft noise nuisance in towns and cities. There's an entirely unnatural and perpetrator-driven standard being pushed by Air Services. The familiar "expectations" line should have been clearly defined in these terms of reference because it's a published arrogant descriptor straight from the Airservices playbook.

These purveyors of harmful, unsustainable aviation noise really believe they can "manage" public expectations, dilute their misdemeanours with lies, cosying up to business barons and politicians so they achieve supreme control over victims - resulting in open-ended access to profits from government-sanctioned greed.

Concentration of low-flying aircraft over densely populated residential areas, and over locations known to be sought by humans for restorative peaceful enjoyment, is unacceptable in this big wide country. So much is now scientifically proven about the adverse health impacts from invasive aviation noise, impacting on mental health, causing sleep deprivation and prevention of normal childhood development.

Children, for example as reported in and around 170+ Brisbane densely populated suburbs and beyond, are suffering loss of peaceful and effective family communications, learning difficulties at home and school (Brisbane's school teachers are using electronic devices to get their voices directly into kids' ears) and coping with transmitted stress from their parents who are trying to cope with an unhealthy noise-laden environment. The same hell that has broken loose on Brisbane's most densely populated suburbs, as far as 30+ kms beyond, has begun its dirty work around the 70% Dutch-owned Hobart Airport. Foreign companies are being permitted, and even welcomed by decision-makers who care not a jot about damaging Australian citizens in surrounding communities, to involve themselves in the Australian aviation industry under their own terms and conditions.

Prime Minister Albanese famously arranged protection of his Grayndler electorate from the impacts of aircraft noise whilst making on the record statements about its detrimental impacts. This White Paper is under PM Albanese's

watch, so ignorance of the current Prime Minister's published statements has to be pointed out and acknowledged as part of this review. The new Infrastructure Minister (who incidentally does not reply to correspondence in relation to aircraft noise and when challenged by community representatives uses her Chief of Staff to block and avoid honest constituents and who at the National Press Club, insulted and offended Brisbane victims), as part of this review, should be directed to interact and react with the paying public - or get out of the job.

Given that Airservices is an organisation that is failing at so many levels, with published anonymous multiple staff discontent and even warnings about safety being a major concern, it is time ASA's CEO is replaced. He just has to go in tandem with the entire organisation being wound up and re-booted with more capable technical staff and stronger government oversight that forces them to comply with laws and regulations.

Airservices Australia (a government agency) has started describing airports as their "customers". No government agency should be commercially engaged with, and prioritising, the wants of any private corporation(s). Airservices has to be responsible to the Australian Government, and it follows, the Australian people. The Australian government must have in place laws and regulations that make Airservices Australia accountable for changing flight path designs, where and how they intend to impact on innocent people who will be expected to survive beneath them. Redress should be set in revised regulations that permit the Minister of the day to direct Airservices to correct both their attitude and careless planning. This type of regulation already exists in Airservices' annual commitments to Ministerial Expectations - that they have wilfully ignored and fail to adhere to. They are an unscrupulous law unto themselves and this must change because an increasingly well-informed public will not tolerate their intransigent conduct.

There are regulations in existence that say Airservices are to engage with the public prior to introducing changed flight paths. This directive was totally ignored before they opened Brisbane's second runway mid-2020. Yet the Infrastructure Minister does not respond to regulated responsibility to address and rectify this non-compliance. It's important that the White Paper make provision for the Minister for Infrastructure to be formally held responsible for Airservices misdeeds.

Aircraft are increasingly creating environmental damage against every convention on planet protection. Government support for airports that raise money out of the misery of the communities that are forced to host their business models will soon find themselves on a short life-span as the increasingly vandalised atmosphere causes growing numbers of affected public to mobilise against unjust and cruel loss of amenity and the environmental pollution that accompanies it.

The skies over our homes are not owned by private companies, so they should not be protected by omission from State and Federal environmental noise laws. The Aviation White Paper must address this harmful anomaly.

It seems that now with many thousands of people in Brisbane (for example) having their sleep and health dictated by Brisbane Airport Corporation and Air Services Australia that there are no viable and enforceable current laws and regulations. However if one digs deep enough, subordinate regulations can be found that do show these agencies are arrogantly ignoring even what protection is there. It is so thin, so hidden and beguiling, it has been demonstrably going unnoticed.

Aviation business is a fine thing. We all want to experience the excitement and happiness that is derived from air travel. We want the economy to thrive as a result of aviation transport but it has to be far better managed, properly governed, prioritising laws and regulations that prioritise basic human rights of sleep, family communications, children's welfare and learning as the first considerations above all else. No money, no political allegiances, no industry is worth sacrificing the wellbeing of the communities who become the unprotected victims of unregulated aviation profiteering. Community leaders in at least 4 Australian states are giving up their valuable lives to stop government, Airservices and their customer airports from defending the indefensible.

Aircraft noise has to be included in Environmental Protection Acts of our parliaments. Since it has for so long been exempt, the Aviation White Paper has to address this human health protection anomaly. There is no sound argument, no agency, no academic, no health practitioner, and certainly no victim whatsoever who is able to support the current idea that high decibel readings are acceptable from overflying, unrelenting aircraft noise forced into people's homes - whilst council trucks, motor vehicles, loud music, lawn mowers, leaf blowers and party-goers are disallowed.

## Curfews:

In December 2009, the Australian Government in its Aviation White Paper committed to formal reviews of the need for a curfew at Brisbane Airport. Today's White Paper has totally overlooked any discussion on the need for a curfew at the same airport. Given the large number of noise complaints since Brisbane Airport opened its new runway and the corporation's notified intentions to increase operations to 110 flights per hour, as well as development of night freight services, this white paper omission is unacceptable. For example, Queensland mp's, at every level, will be further punished (as occurred in the 2022 federal election) as a result of this federally designed policy decision. Labor's watering down of protections beginning with this white paper will be remembered and in a tight contest at the next election may well be the issue that makes them a one term government. The officials who make decisions around this white paper might do well to consider how aviation-affected citizens will respond.

The contrast between conditions of a cap on flights and curfew at Sydney Airport and other airports is both astonishing and insulting. In the federal government sense, this discriminates unfairly in favour of the wellbeing of some communities over others.

**Dot point 6** in the attached document is revealing. Its language suggests that Air Services have had more than a fair hand in developing this White Paper. ".....Without the proactive management of both *community expectations and aircraft noise more broadly*, long-term aviation growth at Brisbane Airport could be constrained through the imposition of operational restrictions." They actually believe they can own and control the population/neighbourhoods of their victims and what terms of reference are adopted for an aviation white paper... !

This government's dismissal of public requests for a curfew for Brisbane Airport on economic grounds also doesn't meet any sensible test. The following cities have curfews with no apparent detriment to their economic strengths: **London, New York, Paris, Frankfurt, Tokyo, Los Angeles and Sydney.**

Therefore a curfew at airports where complaints in a particular time period pre and post PIR has to be a part of this White Paper's oversight. It's never too late. The absence from the current government's Aviation White Paper Terms of Reference for discussions about the sensibility of curfews looks deliberately designed to further lean on, and endanger the welfare of over-flown citizens, discriminating in favour of airport expansions and profits.

## Aircraft Noise Complaints.

Complaints may be an early indicator of problems but we understand ASA rely on complaint fatigue. They rely on people leaving their homes and then, as is the case with the Hamilton residential development, dictate that new residents are not to complain. Air Services complaint system is exclusionary. If someone makes more than one complaint about a particular flight (after there has been no attempt at remedy) that person is cruelly dismissed. Air Services is misguided, inefficient, deceptive and no longer fit for purpose.

## Noise Sharing.

Noise sharing is an abominable idea. Noise sharing implies that environmental noise can be spread around more people to do its dirty work over a wider area, disadvantaging even more of its victims. Wherever extended flight paths have a little "room", they can then be filled with more aircraft equating to even more noise. We wouldn't permit sharing of river or ocean pollution. We wouldn't permit sharing of back-yard incinerator pollution and we're seeing out coal-mine based power pollution. We're not SHARING all that, so why in the name of human common sense are we even discussing noise sharing? The White Paper loses credibility by promoting pollution-sharing when the aim should be noise-pollution reduction. This is another indicator of a government hand-in-glove with airports that put profits above people. The government is supposed to be protecting its constituents, not spreading the noise around for even more families to be covering victims of corporate greed.

## AIRCRAFT NOISE OMBUDSMAN.

The office of the ANO has to be completely removed from the purview and obvious control of Air Services Australia and provided with strong powers that force change if the ANO finds that his/her recommendations are effectively

ignored. Governance arrangements in place with regard to the ANO are not consistent with those of other Commonwealth or state Ombudsmen and raise valid questions about independence. There is a very real perception that independence is justifiably questionable. There is mistrust and cynicism within noise-affected communities, detracting from the ANO's investigative work and analysis.

The Aircraft Noise Ombudsman has no powers. The title is deceptive because it effectively guarantees his deliberations and investigations will amount to nothing. It is an agency that only investigates the manner in which Air Services communicates regarding noise complaints. The ANO effectively reports to the Board of an agency that they are investigating. Looking at the ANO's duties only serves to endorse the view that an agency funded by perpetrators of aircraft noise is in fact an out-dated toothless tiger. The selection of the ANO and allocated resources is basically a case of the inmates running the asylum.

**EMERGING MOTORISED SHORT-DISTANCE AIRCRAFT.**

Intended over-flown public must be involved in early discussions for application/planning for things like drones and automated air taxis. The views of potentially affected public, invited by direct mail so that no individuals are excluded, and representative community groups, must be sought on whether or not they will agree to being over-flown at some future stage. Whenever a drone or an automated air taxi enters the atmosphere over someone's home, they would be invading and controlling previously private community space. Our backyards, our lands, our outdoor recreational areas, our living and sleeping rooms, belong to us. Issues around family privacy, particularly unwanted environmental noise, and various dangers such as collisions, damage to (and dangerous to humans) power lines, **prioritisation of the protection of children's privacy in outdoor spaces** in particular, and concomitant air pollution, must be for the public to decide on - not a government department or politicians with ties to private industry.

As well, authorities will be remiss if they do not thoroughly seek the views of first Australians over whose lands these mechanical inventions might be imposed. If just one aboriginal individual would be impacted, then they should be given the final say.

Children playing in the grounds of their homes **must never be exposed to overflying machinery that are able to disturb, distract, or photograph and record their activities for potential publication and transmission.** Whilst regulations can attempt to address this potential intrusion into children's surrounds, there can be no guarantees that this sort of information won't find its way online or into any other publicly available domain.

Safety Issues.

It's long researched and understood that driver distractions cause motor vehicle accidents and fatalities. Low-flying motorised aircraft would create additional motorist distractions. Split-second attention diversion by such flying objects over roadways and motorways is a side-effect unlikely to be welcomed by police, road safety authorities and accident and emergency specialists. Strong objection could be expected from those entities.

Regards,



## Proposal to Increase Allowable Tailwind at Brisbane Airport – Key Messages

- To enable long-term growth at Brisbane Airport (BNE), Brisbane Airport Corporation Pty Ltd (BAC) must maintain the ability to operate with minimal operational constraints. This will be achieved through the management of community and political responses to increased aircraft noise complaints and the balanced optimisation of Flight Path Operations for noise benefit and efficiency.
- Despite COVID-19 causing a significant reduction in aircraft movements, both BAC and Airservices have seen an increase in noise complaints from sections of the Brisbane community since the opening of Brisbane Airport's New Parallel Runway in July 2020.
- As evidenced both internationally and within Australia, increased public pressure has resulted in operational restrictions at various airports, which have significantly impacted route development opportunities, aircraft efficiency, infrastructure utilisation and ultimately, long-term growth.
- The future profitability of Australia's major airlines will in part depend on BAC's ability to keep the parallel runway system unconstrained as movements along the east coast of Australia are set to double over the next 20-30 years. The airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney Airport and the LAHSO/weather constraints at Melbourne Airport.
- The long-term benefits of Brisbane's parallel runway system will only be realised if operational restrictions such as movement caps and curfews are avoided.
- Brisbane Airport's airspace and runway system provides significantly greater efficiency and capacity than any other airport in Australia and relieves pressure on the east coast network, given the 80-movement cap and curfew in Sydney and the Land and Hold Short Operations (LAHSO) / weather constraints in Melbourne. Without the proactive management of both community expectations and aircraft noise more broadly, long-term aviation growth at Brisbane Airport could be constrained through the imposition of operational restrictions.
- The increased use of Simultaneous Opposite Direction Parallel Runway Operations (SODPROPS) is one way of achieving greater efficiency for airlines while reducing the impacts of aircraft noise on the community. While the current 5 knot tailwind restriction results in night-time (10pm – 6am) "over the bay" use of around 50-52%, there is an opportunity to safely increase tailwind operations to enable greater "over the bay" night-time operations by ~20%. This increase in SODPROPS utilisation would also allow flexibility for more "over the bay" movements in the shoulder periods (before 10pm and after 6am).