

**COMMENT ON PRODUCTIVITY COMMISSION DRAFT REPORT  
ECONOMIC REGULATION OF AIRPORTS – FEBRUARY 2019**

I have lived in the inner west of Sydney in suburbs under or near the flightpath for over 30 years. I currently live in Enmore.

- 1 The claims by Tourism and Transport Forum and Sydney Airport included in your report regarding the curfew and aircraft movement cap are misleading:
  - a. TTF have for years now been running the argument that ‘new generation’ jets are much quieter in order to justify a cut in the curfew and increase aircraft movements. These jets might be quieter but my experience on the ground in Enmore is that any jet landing or taking off will stop a conversation or make it impossible to hear a television, music or a phone conversation. The long pause for an A380 (a new generation quiet jet according to TTF) taking off on the North-south runway will usually be followed by an emphatic ‘Wow’ by new initiates. I regularly awake to the loud roar of the first jet of the day on course for the third runway – much amplified in overcast conditions.

Aircraft manufacturers have been working on quieter jets for decades now and we are likely to have seen the most significant cuts in noise already. Future reductions will almost certainly be minimal. Getting something that big into the sky will never happen quietly.

In short, quieter jets are observably still far too loud to operate during the curfew hours without disrupting the sleep of many, many thousands of Sydney residents.

- b. TTF suggest aircraft in holding patterns are responsible for more noise than if they were allowed to land during curfew hours. In my 30+ years living in this part of Sydney I have not once had my attention drawn by noise from a jet in a holding pattern. I have not even noticed a jet in a holding pattern. Jets at low altitude (landings and take offs) on the other hand are very noisy indeed and so do tend to get noticed. (Perhaps Sydney Airport and TTF are having a little joke – if so I am sorry but it went over my head).

If waiting jets are causing noise in other parts of the city then perhaps it would be more sensible for them to be in a holding pattern over the water (Sorry fish).

2. Given that the Productivity Commission is obliged to consider the community in their recommendations I was surprised to not see any discussion of the social implications of hundreds of thousands of sleep deprived health impacted individuals (not to mention the consequent loss of productivity). All reference to the community appears to only consider cost to the community in dollars. This is very narrow (whatever the report is named or the directions from the PM). There are real and documented health issue to consider - please refer World Health Organisation: <http://www.euro.who.int/en/health-topics/environment-and-health/noise>.

Your report suggests Sydney Airport is just as profitable as other capital city airports because it is efficiently run. That’s good news especially given it is located in the middle of a major city with flight paths over some of the most densely populated parts of that city. Is it certain that an increase in

aircraft movements and reduced curfew would help the economy or might it just reduce efficiencies while costing the community?

Sydney Airport and the Tourism and Transport Forum are confident there are real economic benefits of increased aircraft movements and a compromised curfew and this view is supported by the Productivity Commission. Yet the lobbyists are unlikely to have any personal concept of the noise impact of a jet movement at low altitude against the quiet background noise of the night (I do). Their suggestion that these changes can occur with little or no impact on the community are weak, specious and disingenuous. They represent groups that will increase profits at a direct social cost to a broad sweep of the community. An honest report by the Productivity Commission would acknowledge this.

Maintaining the curfew and cap on aircraft movements is critical to the liveability of many thousands of Sydney households. The productivity commission is obliged to take into consideration the social impact of compromising these protections:

*'The Commission is obliged under its statutory guidelines to take a broad view, encompassing the interests of the economy and community as a whole, rather than just particular industries or groups. Environmental, regional and social dimensions of its work are also carefully considered, informed by public consultation and the Commission's own research capability'.*

Yours sincerely

James Buckman