

17 April 2024

Mr Tas Larnach
Committee Secretary
Senate Standing Committees on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Mr Larnach

Re: EAPL Response to the Terms of Reference for the Inquiry into the Impact and Mitigation of Aircraft Noise

Essendon Airport Pty Ltd (EAPL) appreciates the opportunity to respond to the Terms of Reference for the Inquiry into the Impact and Mitigation of Aircraft Noise. We recognise the complexity of addressing the issue of aircraft noise and the importance of a balanced approach that considers community concerns while safeguarding the interests of the general aviation industry.

Roles and Responsibilities of Stakeholders

Understanding the roles and responsibilities of stakeholders is necessary for effectively addressing aircraft noise issues. While EAPL plays a role in certain aspects of aircraft noise management, airspace design and air traffic management fall under the jurisdiction of Airservices Australia.

EAPL has limited authority in regulating aviators' behaviour and relies on engagement with the Federal Department for issuing sanctions. Mandating specific flight routes is beyond the scope of an airport operator.

Under the *Air Services Act 1995*, Airservices has an obligation to provide environmentally responsible air services by minimising the environmental impact of aircraft operations, including the impact of aircraft noise. Airport operators influence aviators' practices through items such as Fly Neighbourly Agreements (FNA), Community Aviation Consultation Groups (CACG) and Airport User Groups (AUG), facilitating discussions on aviation issues and their impacts. The Essendon Fields Airport (EFA) FNA encourages operators to minimise flights over residential areas, aligning with Airservices noise and community principles.



Continued collaborative efforts with all stakeholders are essential to mitigate noise-based impacts and avoid overly burdensome restrictions that may affect the viability of general aviation businesses, operations and activities.

Response to Specific Terms of Reference Items

B) The Effect of Aircraft Noise on Small Business:

The curfew at EFA highlights how such measures affect the market competitiveness for Fixed Base Operators (FBOs), necessitating aircraft to operate at the Melbourne Jet Base located at Melbourne Airport within EFA's curfew period. Specifically, the curfew creates a structural competitive disadvantage for EFA and consequently the businesses that are not able to use the aerodrome during those hours.

C) Any Proposals for the Mitigation and Limitation of Aircraft Noise, including Flight Curfews, Changes to Flight Paths and Alternatives to Air Travel:

Implementing restrictions based solely on current aircraft and flight patterns carries risks. An example of this is the curfew at EFA which includes a Maximum Take-off Weight (MTOW) limit to mitigate noise, which is a blunt tool and not necessarily an effective mitigation strategy where modern aircraft may be heavier yet faster and quieter. This highlights the need for more contemporary criteria to be established that focuses on the actual impact of aircraft noise levels.

E) Any Other Related Matters:

- 1. Improvement of Airservices Australia's Design, Development and Management of Flight Paths** - Detailed airspace design should precede the approval of Major Development Plans (MDP) to ensure transparent and accurate community consultation. This is particularly critical when proposed changes may impact the locations of flight paths and percentage of runway use, resulting in changes to aircraft noise levels the community experience.
- 2. Improving Noise Metrics** - Supplementing the Aircraft Noise Exposure Forecast (ANEF) planning tool with more recognisable metrics, such as N-above contours that indicate the number of aircraft noise events over a specified decibel level to ensure community engagement and consultation is more effective and transparent.
- 3. Emerging Aviation Technologies** – Developing comprehensive policies for traditional and emerging aircraft, including drones and eVTOLs, is necessary. A national airspace review should consider all aspects impacting airspace use.



- 4. Aircraft Noise Mitigation Schemes** – Introducing aircraft noise mitigation schemes should be carefully evaluated to avoid unnecessary burdens on airport operators. There is a need to understand the full spectrum of community annoyance related to noise. According to the Civil Air Navigation Services Organisation (CANSO) and Airports Council International (ACI) in 2018, acoustic factors account for approximately 30% of community annoyance related to noise. They recommended States and the aviation industry gain a greater understanding of the remaining 70% to develop policies and actions responsibly.

EAPL looks forward to the outcomes of this inquiry and remains committed to contributing further to this important discussion on aircraft noise impact and mitigation.

Yours sincerely
Essendon Airport Pty Ltd