



Inquiry into the Effectiveness of Airservices Australia Management of Airport Noise

Submission Lodged by: City of Kingston
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1. The City of Kingston is located in the South East suburbs of metropolitan Melbourne and has approximately 140,000 residents.
2. The Moorabbin Airport is located within the City of Kingston. Council is represented on the Moorabbin Airport Aviation Consultative Committee.
3. The two most significant issues relating to the operation of the Moorabbin Airport are:-
 - Safety
 - Airport Noise

The level of risk associated with airport activities and the impact of aircraft noise have both increased over recent years with increased training activities and a significant growth in helicopter movements.

4. Airservices Australia identifies Moorabbin Airport as the third busiest airport for aircraft movements in Australia. The Preliminary Draft Master Plan for Moorabbin Airport identifies movements to increase.
5. The areas identified in the 1999 ANEF for Moorabbin Airport as being subject to aircraft noise were generally located beyond the ends of the runways, industrial precincts, non urban areas and residential areas to the south and west of the airport.
6. The ANEF included in the 2009 Preliminary Draft Master Plan identified residential areas to the east of the airport that are now subject to aircraft noise. This change is attributable to pilot training circuit activity.
7. It is acknowledged that air traffic volumes may have remained relatively static over the last 12 years or so, yet the impacts of airport noise as reflected in the 2009 ANEF have increased. The Draft Masterplan for Moorabbin Airport plan confirms that *'pilot training is the major activity at Moorabbin Airport'*.

8. The Preliminary Draft Master Plan seeks to consolidate and support commercial flying training and that many students are full time commercial trainees from overseas. *'Pilot training is the major activity at Moorabbin Airport'*. The plan recognised that during April 2008 a record 40,000 movements were recorded mainly due to an increase in pilot training.
9. Kingston is particularly concerned with the noise and safety aspect of 'circuit training' which requires aircraft to move directly over residential areas as identified in Section 7.5 of the Preliminary Draft Master Plan. By contrast aircraft travelling to and from the airport have significantly less impact on residential areas.
10. Given the increase in trainee activity, Council has consistently raised concerns on behalf of the Kingston community regarding the appropriateness of training being conducted over a densely populated urban area. Council believes that pilot training should be relocated to a non urban area.
11. In recent years there have been a number of incidents including fatalities in the Cheltenham residential area and within the airport boundary.
12. The City of Kingston does not believe it is appropriate that circuit training at Moorabbin continues to be encouraged, ahead of airfields located in regional areas within reasonable proximity to Melbourne where the exposure to risk and the impacts of aircraft noise are substantially less.
13. Although there may be a clear economic benefit from international pilot training, Kingston does not believe this should be at the cost of increasing the exposure of more residents to aircraft noise as identified by the 2009 ANEF, and the ongoing and escalating public safety risk to people in their own homes.
14. Supporting material for the *'Moorabbin Airport Australian Noise Exposure Forecasts (ANEF) November 2008 Revision'* suggests that in 2007 approximately 43,400 or 14% of all movements, were helicopters. Anecdotally based on community feedback a greater tension is emerging between residential amenity and the operation of helicopters originating from Moorabbin.
15. Council regularly receives complaints from residents in the Dingley, Mordialloc, Mentone and Cheltenham areas regarding the impact of aircraft noise.
16. The level of complaints has increased as aircraft training has increased.
17. Community members of the Moorabbin Airport Aviation Consultative Committee continue to raise concerns regarding aircraft noise. The issues raised have not been addressed to the satisfaction of the community members.
18. There are many reports of breaches of the controls that are in place ie: procedures published in Aeronautical Information Publication – ERSA (AIP – ERSA) are designed to minimise noise impacts on surrounding suburbs. The procedure for departures from runway 17R at Moorabbin calls for aircraft to maintain runway heading until after they are south of the Woodlands Golf Course.

19. In a letter from Mr Richard Dudley, General Manager Corporate Affairs to the Australian Mayoral Aviation Council, Mr Dudley acknowledges that:-

“I have examined a sample of flight tracks which indicates that aircraft conducting circuits from runway 17R do indeed turn onto their crosswind leg well before they are south of the golf course. The flight tracks also indicate that the majority of non-circuit aircraft appears to be adhering to the published procedure.

My advice is that if aircraft conducting circuit training waited until they were south of the golf course before making their crosswind turn, they would be at a much greater height than is standard for the first turn in a normal circuit.

Procedures published AIP – ERSA are also not legally binding on operators.

However, Airservices Australia will make representations to Moorabbin Airport in an effort to remind operators of the published procedures and the need to adhere to them where possible.”

20. The issue of planes flying in circuits over residential areas is of particular concern to sections of the Kingston community.

As can be seen by Mr Dudley’s letter, the controls in place are not enforceable and that Airservices Australia proposed that the matter be raised with the Moorabbin Airport.

21. The operators of the Moorabbin Airport has made it very clear to the community that they have no jurisdiction over aircraft movements.

As can be appreciated the lack of enforcement even though breaches are acknowledged is very frustrating for those that are impacted by aircraft noise.

22. In response to the matters referred to the Senate Standing Committee:-

(a) *Has Airservices conducted an effective, open and informed public consultation strategy with communities affected by aircraft noise?*

Council is not aware of any consultation strategy to engage the local community regarding the impacts of aircraft noise.

Feedback to Council would suggest that those members of the community who attempt to raise concerns with regard to airport noise do not believe that the concerns are given serious consideration. This resident concern is supported by Council.

- (b) *Has Airservices engaged with industry and business stakeholders in an open, informed and reasonable way?*
- (c) *Has Airservices provided adequate triggers for public consultation under legislation and whether procedures used by Airservices Australia are compliant with these requirements?*

Representatives of Airservices Australia are regular attendees at the Moorabbin Airport Aviation Consultative Committee. When issues associated with aircraft noise and in particular non observance of guidelines, the representatives acknowledge the issues but emphasize that there is no enforcement mechanism to ensure compliance with guidelines ie: the guidelines are not mandatory.

Council has had no direct contact with Airservices Australia during the preparation of the most recent ANEF. All communication was co-ordinated through the Moorabbin Airport Corporation.

- (d) *Is Airservices accountable, as a government-owned corporation, for the conduct of its noise management strategy?*

It is the view of many sections of the Kingston community and Council that there is no noise management strategy for aircraft involved in circuit training.

The majority of issues raised by community members with Council involve:-

- Circuit training conducted on weekends and public holidays; and
 - Circuit movements that do not comply with guidelines for departing the Moorabbin Airport.
- (e) *Has Airservices pursued and established equitable noise-sharing arrangements in meetings its responsibilities to provide air traffic services and to protect the environment from the effects associated with aircraft for which it is responsible?*

Council is not aware of any noise sharing opportunities associated with circuit training at Moorabbin Airport.

- (f) *Does Airservices require a binding Community Consultation Charter to assist it in consulting fully and openly with communities affected by aircraft noise?*

Council is not aware of any initiatives to establish a binding community consultation charter for Moorabbin Airport.

Conclusions

The City of Kingston welcomes the opportunity to respond to the Senate Inquiry and requests that consideration be given to the implementation of recommendations that will:-

- Eliminate pilot training over established residential areas and therefore, improve the residential amenity of communities that are impacted by aircraft noise associated with pilot training; and
- Allow a mechanism to effective police compliance with guidelines for aircraft utilising Moorabbin Airport.