

## **Submission to Senate Enquiry into AirServices Australia**

My name is Tony Anderson and I reside in Stoneville WA6081.

I have no objection to the Senate Committee publishing any part or all of this document.

My submission intends to show that AirServices Australia failed to follow their own published **Principles and Procedures** when implementing at least one of the new departure routes from Perth Airport in November 2008. Also I propose to show that a very senior officer in the AirServices Australia organisation was ignorant or ill informed of the changes introduced by WARRP as late as August 2009, some nine months after their introduction. Additionally I will offer evidence that ASA is not monitoring the activities of its Air Traffic Control staff here in Perth with regard to adherence to Standard Arrival and Departure Routes, to the detriment of the community with regard to further noise pollution. I will also show that ASA has failed to consult with the community over these changes and when they have communicated with the public they have attempted to hide under the cloak of 'safety'

My wife and I have been resident here since July 1996 and previously lived in a nearby location and during the many years we have lived in this area we were aware of the arrival route to Runway 24 which passed near our property.

The Principles and Procedures referred to above are laid out in the AirServices Australia publication **Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise** (Environmental Branch 19<sup>th</sup> August 1997, Revised 21 November 2002), copy attached.

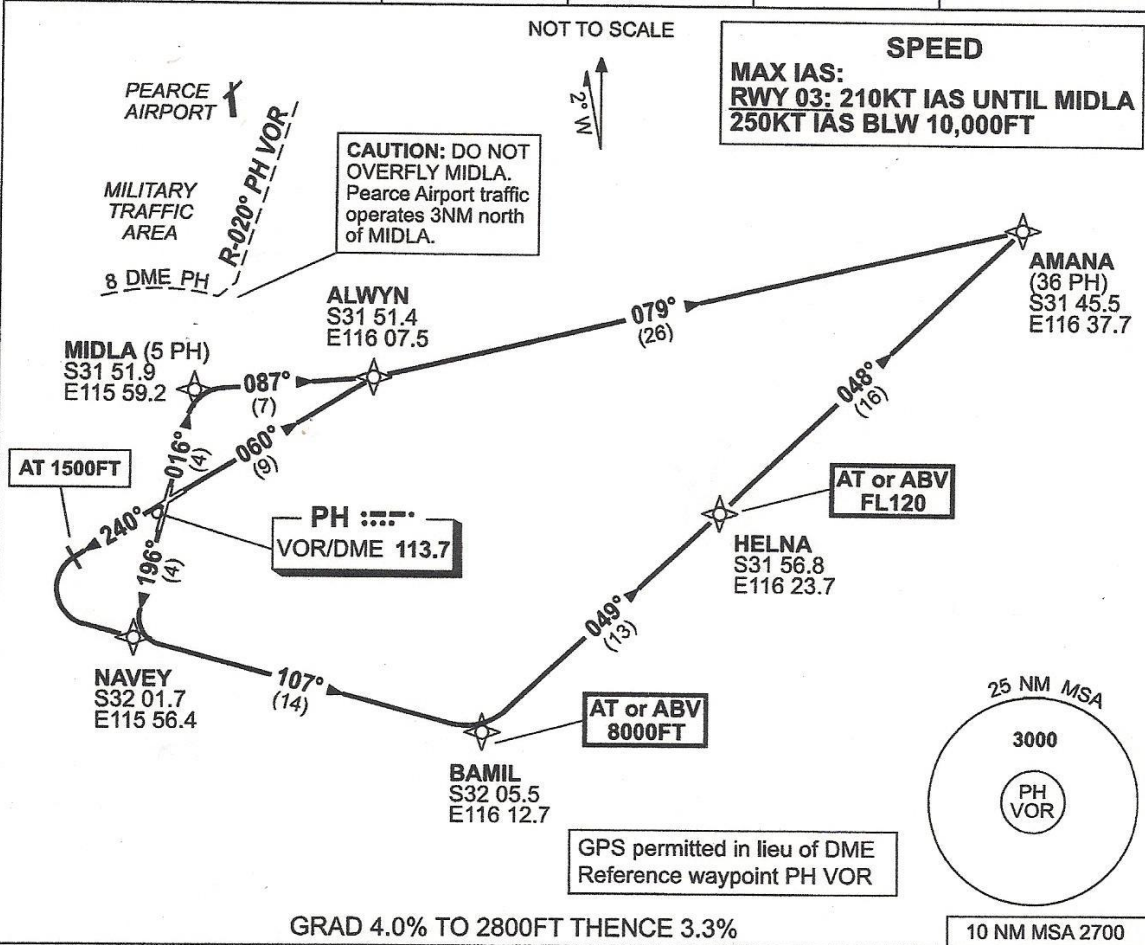
The departure route I refer to is the AMANA TWO (JET) (RNAV) from Runways 03 and 06, introduced as part of the WARRP in November 2008, copy below.

Additionally I have included a local area map showing locations and waypoints referred to throughout this document. (See page 3).

STANDARD INSTRUMENT DEPARTURES (SID)  
 AMANA TWO (JET) (RNAV)  
 PERTH, WA (YPPH)

27 AUG 2009

ATIS 113.7 123.8	ACD 118.55	SMC 121.7	TWR 120.5	DEP 118.7	Bearings are Magnetic Elevations in FEET AMSL
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AMANA TWO DEPARTURE (JET)

RWY 03

- Track 016° to MIDLA,
- Turn RIGHT, track 087° to ALWYN,
- Turn LEFT, track 079° to AMANA, thence as cleared

RWY 06

- Track 060° to ALWYN,
- Turn RIGHT, track 079° to AMANA, thence as cleared

RWY 21

- Track 196° to NAVHEY

RWY 24

- Track 240°
- At 1500FT turn LEFT,
- Track DCT to NAVHEY

From NAVHEY

- Track 107° to BAMIL  
 Cross BAMIL AT or ABV 8000FT
- Turn LEFT, track 049° to HELNA,  
 Cross HELNA AT or ABV FL120,
- Track 048° to AMANA, thence as cleared

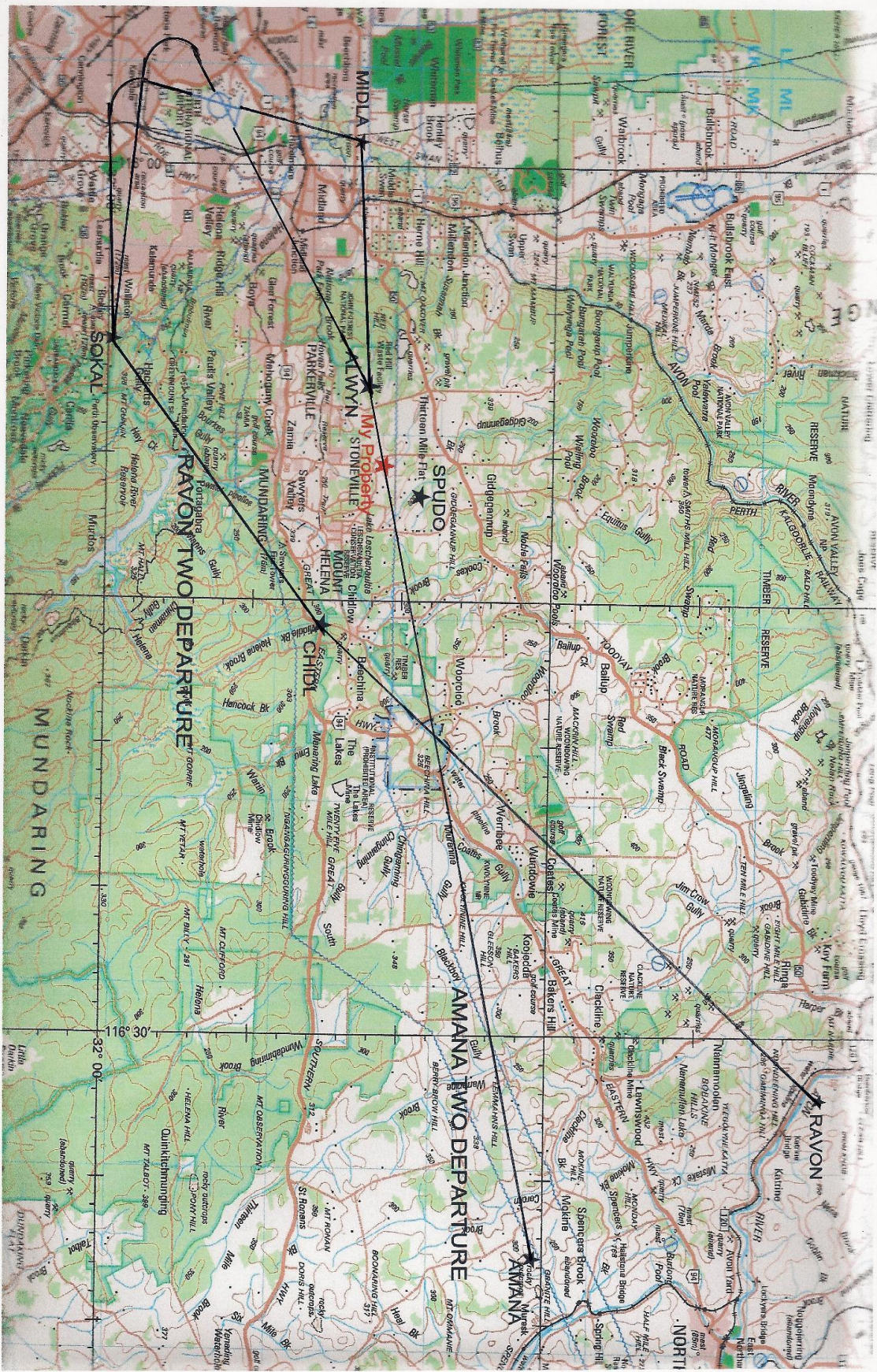
Changes: PH NDB DCMSD, RWY 06/24 TRACKS, BAMIL TO HELNA TRACK.

PPHDP03-120

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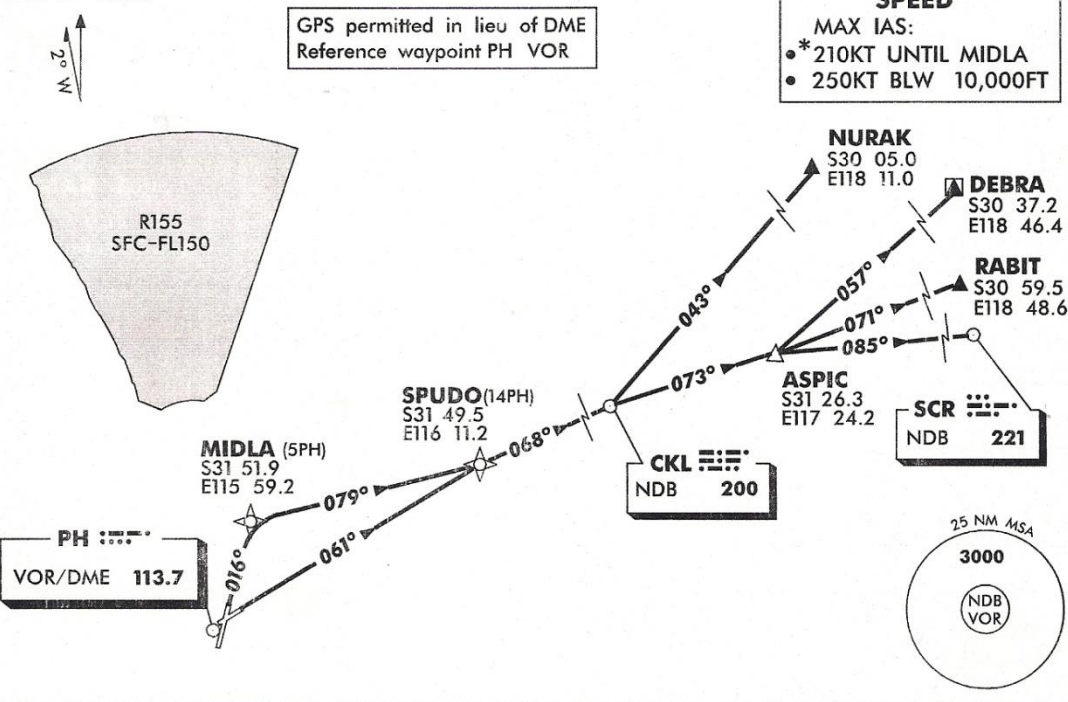
Previously eastbound jet traffic from these runways tracked to SPUDO, either directly from Runway 06 or via MIDLA from Runway 03. The CLACKLINE EIGHT (JET) (RNAV) departure dated 16<sup>th</sup> March 2006 shown below illustrates this.

**STANDARD INSTRUMENT DEPARTURES (SID)  
RWY 03 & 06 CLACKLINE EIGHT (JET) (RNAV)  
PERTH, WA (YPPH)**

16 MAR 2006

ATIS 113.7 123.8 272	ACD 118.55	SMC 121.7	TWR 120.5	DEP 118.7	BRG are MAG ELEV in FT AMSL
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NOT TO SCALE



**CLACKLINE (CKL) EIGHT DEPARTURE**

**RWY 03**

- GRAD 4.0% to 2800FT, thence 3.3%
- Track 016° to MIDLA
- From MIDLA turn RIGHT, track 079° to SPUDO
- From SPUDO turn LEFT, track 068° to CKL

**RWY 06**

- GRAD 4.0% to 2800FT, thence 3.3%
- Track 061° to SPUDO
- From SPUDO turn RIGHT, track 068° to CKL

**AT CLACKLINE (CKL)**

- For NURAK
  - Turn LEFT, track 043° to NURAK, thence as cleared
- For DEBRA
  - Turn RIGHT, track 073° to ASPIC, then
  - Turn LEFT, track 057° to DEBRA, thence as cleared
- For RABIT
  - Turn RIGHT, track 073° to ASPIC, then
  - Turn LEFT, track 071° to RABIT, thence as cleared
- For SOUTHERN CROSS (SCR)
  - Turn RIGHT, track 073° to ASPIC, then
  - Turn RIGHT, track 085° to SCR, thence as cleared

Changes: REVISED PROC.

PPHDP03-106

The new route from ALWYN to AMANA passes over a much more highly populated area than did the previous route to SPUDO and this would appear to be in direct contradiction of Principle 1:

**Noise abatement procedures should be optimized to achieve the lowest possible overall impact on the community.**

Had the new route been placed North of the old route it would have passed over farming land which is far less densely populated.

The new routing also appears to contradict Principle 2:

**Noise should be concentrated as much as possible over non residential areas.**

for the same reason.

With regard to Principle 3:

**Noise exposure should be fairly shared whenever possible.**

As explained above, we have lived in this area for a number of years and have accepted the inbound traffic without complaint but now we are being made to suffer an enormous increase in traffic and noise. I hardly see this as **Noise Exposure being Fairly Shared**. The increase in overflights is confirmed by the following extract of an email from the AirServices Australia Noise Enquiry Unit (NEU):

**From:**  
**Sent:** Friday, 7 August 2009 10:22 AM  
**To:**  
**Cc:**  
**Subject:**

From the tracks that the NEU has done for Anderson at Stoneville, it is apparent that he has been affected by the WARRP changes. Tracks for a day in July 2009 and a three day period in July 2008 (three days were selected to get a similar number of departures due to the different runway selections) show a high concentration of flights over Anderson's home (his street is marked in red). The departure path is further south than it was.

I have no comment on Principles 4 and 5.

With regard to Principle 6, one assumes that modelling was done as part of the Noise Impact Assessment (see page 13 of **Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise**). I am assured by the NEU in an email dated 12<sup>th</sup> November 2009 that a full assessment was carried out. However, the several requests made to AirServices Australia by the Perth Airport Noise Monitoring Consultative Committee (PANMCC) for a copy of this assessment were met with procrastination. One wonders what AirServices Australia has to hide.

This is one of many examples of AirServices Australia's failure in the consultation process.

I have no comment on Principles 7, 8, 9 or 10.

Principle 11:

**In deciding between mutually exclusive, but otherwise equivalent options, involving**

**(i) the overflight of an area which has previously been exposed to aircraft noise for a considerable period of time (and which a large proportion of residents would therefore have been aware of the noise before moving in); or**

**(ii) a newly exposed area,**

**option (i) should be chosen.**

The AMANA TWO (JET) (RNAV) Standard Instrument Departure from Runways 03 and 06 should be considered as overflying a newly exposed area (see Table 2, page 16 of **Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise**) whereas the area to the North of the pre November 2008 route has been overflown by previous departure procedures.

Principle 12:

**To the extent practicable, residential areas overflown by aircraft arriving on a particular runway should not also be overflown by aircraft departing from the runway in the reciprocal direction.**

As previously shown in the email extract above, our residence is overflown by inbound traffic to Runway 24 and then by departing Eastbound traffic from Runway 06 in direct contradiction of Principle 12. We would be quite content to continue being affected by the inbound traffic but would ask that the outbound routing be moved.

At least one senior officer in AirServices Australia seems ignorant of, or ill informed about, the changes introduced by WARRP in November 2008. I refer to the email, shown below, sent to Minister Albanese on 10<sup>th</sup> July 2009 and the reply I received from AirServices Australia on 4<sup>th</sup> August 2009.

From: TonyAnderson" <tonyanderson@  
To: <A.Albanese.MP@aph.gov.au>  
Sent: Friday, 10 July 2009 14:19  
Subject: Aircraft Noise problems in Perth

Dear Sir

I refer to the recent changes to the aircraft arrival and departure routes at Perth International Airport.

I live two kilometres south east\* of the way point SPUDO to which all westbound arrivals for Runways 21 and 24 at Perth Airport are directed and as such we receive the noise of all these inbound flights.

This situation has not changed (although the name of the way point has) for at least the last 14 years and we can live with that.

However, what we are having great difficulty with is the change of departure routing for eastbound aircraft from Runways 03 and 06. The aircraft are routed via the recently established way point ALWYN where they then turn right onto a track of 079 degrees and fly over my property. Thus we get all the noise of inbounds to Runways 21 and 24 and additionally we get all the noise from aircraft departing east from Runways 03 and 06.

Previously the easterly departures from Runways 03 and 06 were routed further north and did not affect us greatly.

I would request that the easterly jet departure routings from Runways 03 and 06 be changed to allow the aircraft to be rerouted further north as previously. The old routing allowed aircraft to remain clear of the Pearce Military Traffic Area.

I understand also that the inbound routing from the north via HERNE, GUNGN and WUNGO for Runways 03 and 06 is causing distress to residents of Glen Forest and Roleystone. These areas lie at around 1000 feet above sea level and are therefore that much nearer to the overflying aircraft than are coastal areas. Previously these arrivals were routed to the west of the airport. I would request that the previous routes be reinstated.

Yours sincerely

Tony Anderson

\*This is incorrect. My property is located 3.3km Southwest of SPUDO.



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Mr Tony Anderson  
Email: tonyanderson@

Dear Mr Anderson

Thank you for your email dated 10 July 2009 to the Minister for Infrastructure, Transport, Regional Development and Local Government, the Hon Anthony Albanese MP, about changes to flight paths at Perth. The Minister has forwarded your email to Airservices Australia for response.

I note that you have written in similar terms to Airservices' Noise Enquiry Unit and received replies on 14 and 16 July.

I further note your comments about changes to air routes with regard to the SPUDO waypoint, in particular the departure procedure for eastbound aircraft from Runways 03 and 06. Prior to the flight path changes resulting from the Western Australia Route Review Project (WARRP) which commenced in November 2008, both jet and turbo-prop aircraft departed these runways via the SPUDO waypoint. After the WARRP implementation, jets continue to use this procedure so in that regard there has been no change. Non-jets, however, now use a different track after they have overflown ALWYN and no longer overfly SPUDO. This situation is shown in the enclosed maps.

Placing jets and non-jets on separate flight paths soon after take-off provides for safer and more efficient use of available airspace as they have very different operating capabilities such as speed and rate of climb. Whilst the intention is to route less aircraft in the vicinity of SPUDO than previously, variation can occur due to seasonal weather trends (where one end of the runway needs to be used more than the other) and changes in the aircraft fleet mix. On the latter point, in April this year we noted there were some 18% more jets and 17% less turbo-prop aircraft operating at the airport than in April 2008.

Thank you again for your enquiry.

Yours sincerely

4 August 2009



In his reply (...) states:

“ I further note your comments about changes to air routes with regard to the SPUDO waypoint, in particular the departure procedure for eastbound aircraft from Runways 03 and 06. Prior to the flight path changes resulting from the Western Australia Route Review Project (WARRP) which commenced in November 2008, both jet and turbo-prop aircraft departed these runways via the SPUDO waypoint. After the WARRP implementation, jets continue to use this procedure so in that regard there has been no change.”

If, as (...) states, there has been no change to the Eastbound jet departure routes, then the question arises: Why are these jet departures flying over my house when I live some 3.3km from SPUDO?

Three hypotheses arise:

1. the waypoint SPUDO has been reassigned to another geographical location
2. that Eastbound jet departures are following the incorrect track
3. that (...) of AirServices Australia is ignorant of all the changes effected by the WARRP in November 2008

Investigation of (1.) above is a simple matter. Reference to the pre WARRP CLACKLINE EIGHT (JET) (RNAV) Standard Instrument Departure dated 16 MAR 2006 (page 3) shows SPUDO's geographical location (expressed in latitude and Longitude) as being South 31 degrees and 49.5 minutes (S31 49.5) and East 116 degrees and 11.2 minutes (E116 11.2). If this is compared to the position of SPUDO on the post WARRP BEVLY THREE ARRIVAL (JET) (RNAV) dated 27 AUG 2009, as depicted on page 13, one will note that the geographical location remains the same.

With regard to (2.), I have perused WebTrak and observed that all Eastbound jet departures from Runways 03 and 06 follow the AMANA TWO (JET) (RNAV) Standard Instrument Departure dated 27 August 2009 (page 2). There is no other Eastbound jet departure published for these runways so these aircraft are not following the incorrect track.

This leads one to the conclusion that (...) of AirServices Australia is ignorant of all the changes effected by the WARRP in November 2008.

One would expect an officer of this rank and position to be better informed, especially when replying on behalf of the Minister.

AirServices Australia seems to exercise little control over their Air Traffic Control staff at Perth in relation to ensuring that aircraft maintain the assigned Arrival or Departure track.

When Runway 21 is in use we are constantly overflown early in the morning (5am onwards) by twin engined aircraft allegedly on the RAVON TWO (NON\_JET) (RNAV) departure (page 11). The nearest point on this route from our house is over 9 km to the Southeast. (See map, page 3).

Additionally we are overflown by Jet traffic inbound to Runway 03, supposedly on the JULIM THREE ARRIVAL (JET) (RNAV) arrival (page 12) and also by traffic inbound on the BEVLY THREE (JET) (RNAV) arrival for Runway 24 (page 13). This traffic appears to be allowed to turn left before ROLOB and then tracks South of SPUDO.

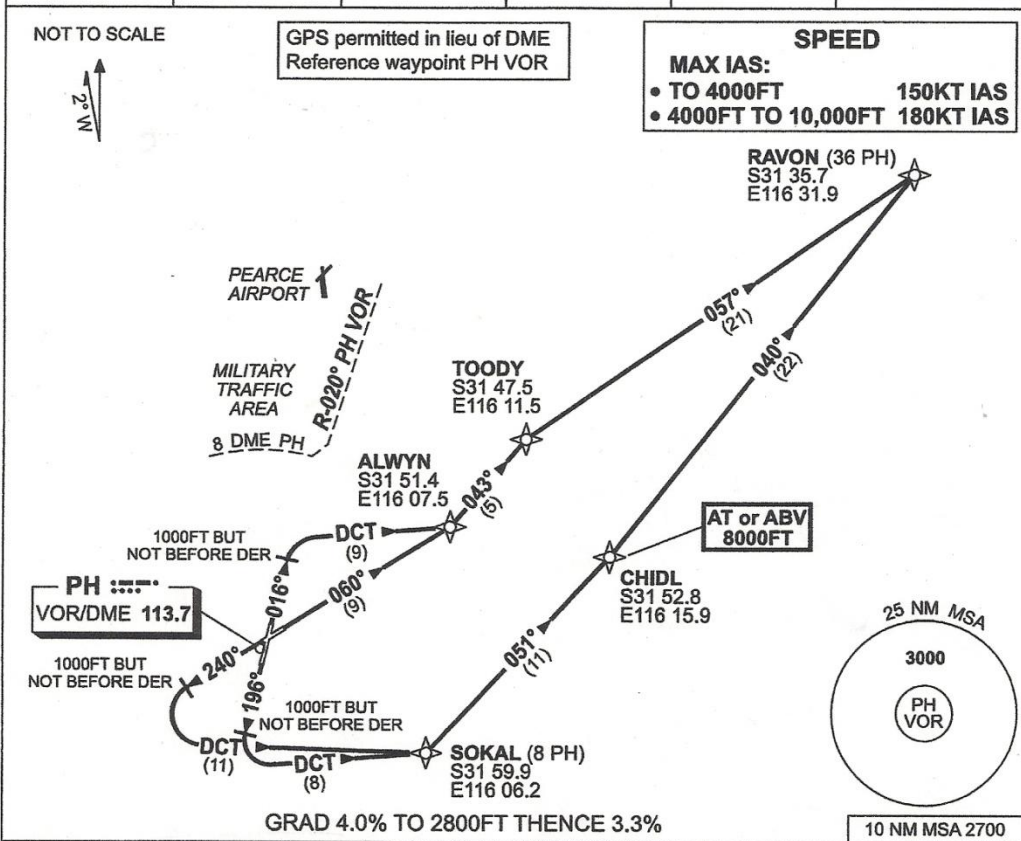
These unnecessary off track overflights add to the already high levels of aircraft noise pollution that we endure.

Whenever I query the NEU on these off track overflights I am told they are done for 'safety' reasons. I am a retired aviator of 38 years worldwide experience and when I look at these deviations on WebTrak I am unable to see any conflicting traffic. I feel that AirServices Australia should ensure that arrival and departure routes are not deviated from without just cause.

**STANDARD INSTRUMENT DEPARTURES (SID)  
RAVON TWO (NON-JET) (RNAV)  
PERTH, WA (YPPH)**

27 AUG 2009

ATIS 113.7 123.8	ACD 118.55	SMC 121.7	TWR 120.5	DEP 118.7	Bearings are Magnetic Elevations in FEET AMSL
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**RAVON TWO DEPARTURE (NON-JET)**

**RWY 03**

- Track 016°
- At 1000FT but not before DER (1.1 DME)
- Turn RIGHT, track DCT to ALWYN
- Turn LEFT, track 043° to TOODY
- Turn RIGHT, track 057° to RAVON, thence as cleared

**RWY 06**

- Track 060° to ALWYN
- Turn LEFT, track 043° to TOODY
- Turn RIGHT, track 057° to RAVON, thence as cleared

**RWY 21**

- Track 196°
- AT 1000FT but not before DER (0.8 DME)
- Turn LEFT, track DCT to SOKAL

**RWY 24**

- Track 240°
- AT 1000FT but not before DER (Abeam PH VOR)
- Turn LEFT, track DCT to SOKAL

**From SOKAL**

- Turn LEFT, track 051° to CHIDL
- **Cross** CHIDL AT or ABV 8000FT
- Turn LEFT, track 040° to RAVON, thence as cleared

Changes: PH NDB DCMSD, RWY 06/24 TRACKS.

PPHDP12-120

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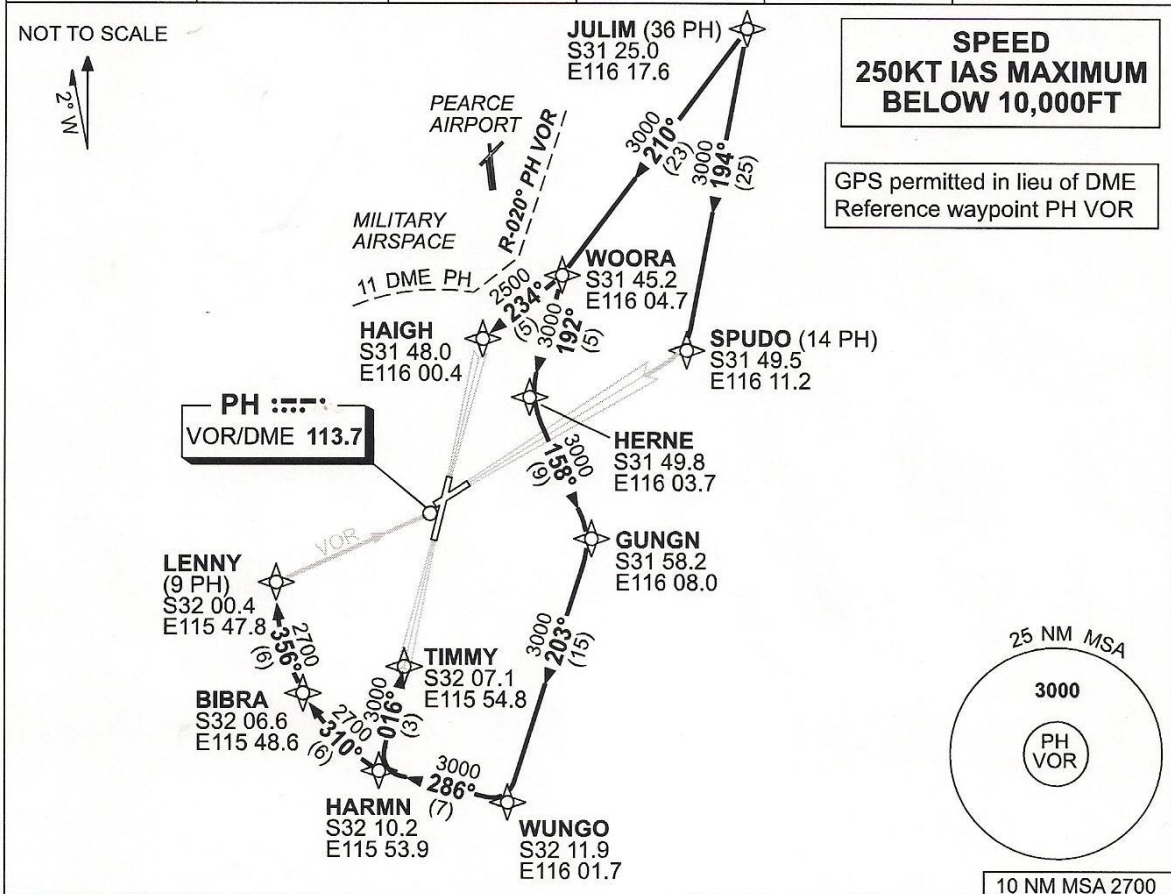




**STANDARD ARRIVAL ROUTE (STAR)  
JULIM THREE ARRIVAL (JET) (RNAV)  
PERTH, WA (YPPH)**

27 AUG 2009

ATIS 113.7 123.8	PEA CEN 123.3	APP 123.6	TWR 120.5	SMC 121.7	Bearings are Magnetic Elevations in FEET AMSL
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**ARRIVAL: JULIM THREE (JET)**

- RWY 03:** From JULIM, track 210° to WOORA,  
 • Turn LEFT, track 192° to HERNE,  
 • Turn LEFT, track 158° to GUNGN,  
 • Turn RIGHT, track 203° to WUNGO,  
 • Turn RIGHT, track 286° to HARMN,  
 • Turn RIGHT, track 016° to TIMMY,  
 Intercept LOC RWY 03.
- RWY 06:** From JULIM, track 210° to WOORA,  
 • Turn LEFT, track 192° to HERNE,  
 • Turn LEFT, track 158° to GUNGN,  
 • Turn RIGHT, track 203° to WUNGO,  
 • Turn RIGHT, track 286° to HARMN,  
 • Turn RIGHT, TRACK 310° to BIBRA,  
 • Turn RIGHT, track 356° to LENNY for  
 VOR RWY 06.
- RWY 21:** From JULIM, track 210° to WOORA,  
 • Turn RIGHT, track 234° to HAIGH,  
 Intercept LOC or RNAV (GNSS)  
 RWY 21.
- RWY 24:** From JULIM, track 194° to SPUDO,  
 Intercept LOC RWY 24.
- NOTE:** If listed APP is not AVBL, ACFT can expect  
 alternative instructions from PH APP within 36NM PH.

**COMMUNICATIONS FAILURE: PROCEDURE IN IMC**

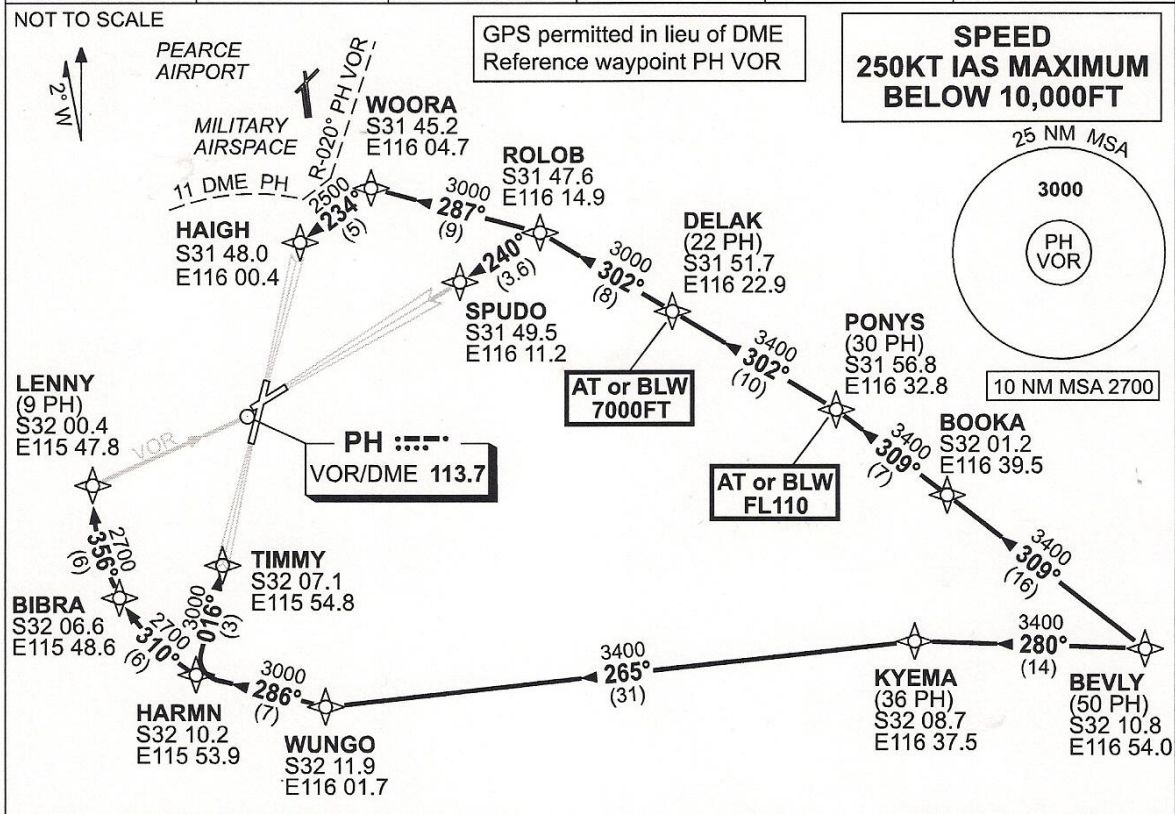
- Squawk 7600, comply with vertical navigation requirements, but not below MSA.
- Track via the latest STAR clearance to the nominated runway, then fly the most suitable approach in accordance with ERSA EMERG Section 1.5.

Changes: REVISED PROCEDURE, PH NDB DCMSD. PPHSR04-120

**STANDARD ARRIVAL ROUTE (STAR)  
BEVLY THREE ARRIVAL (JET) (RNAV)  
PERTH, WA (YPPH)**

27 AUG 2009

ATIS 113.7 123.8	PEA CEN 123.3	APP 123.6	TWR 120.5	SMC 121.7	Bearings are Magnetic Elevations in FEET AMSL
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**ARRIVAL: BEVLY THREE**

**RWY 03:** From BEVLY, track 280° to KYEMA,  
• Turn LEFT, track 265° to WUNGO,  
• Turn RIGHT, track 286° to HARMN,  
• Turn RIGHT, track 016° to TIMMY,  
Intercept LOC RWY 03.

**RWY 06:** From BEVLY, track 280° to KYEMA,  
• Turn LEFT, track 265° to WUNGO,  
• Turn RIGHT, track 286° to HARMN,  
• Turn RIGHT, TRACK 310° to BIBRA,  
• Turn RIGHT, track 356° to LENNY for  
VOR RWY 06.

**NOTE:** If listed APP is not AVBL, ACFT can expect  
alternative instructions from PH APP within 36NM PH.

**RWY 21:** From BEVLY, track 309° to BOOKA,  
• Track 309° to PONYS,  
**Cross** PONYS AT or BLW FL110,  
• Turn LEFT, track 302° to DELAK,  
**Cross** DELAK AT or BLW 7000FT,  
• Track 302° to ROLOB,  
• Turn LEFT, track 287° to WOORA,  
• Turn LEFT, track 234° to HAIGH,  
Intercept LOC or RNAV(GNSS)RWY 21.

**RWY 24:** From BEVLY, track 309° to BOOKA,  
• Track 309° to PONYS,  
**Cross** PONYS AT or BLW FL110,  
• Turn LEFT, track 302° to DELAK,  
**Cross** DELAK AT or BLW 7000FT,  
• Track 302° to ROLOB,  
• Turn LEFT, track 240° to SPUDO,  
Intercept LOC RWY 24.

**COMMUNICATIONS FAILURE: PROCEDURE IN IMC**

- Squawk 7600, comply with vertical navigation requirements, but not below MSA.
- Track via the latest STAR clearance to the nominated runway, then fly the most suitable approach in accordance with ERS A EMERG Section 1.5.

Changes: REVISED PROCEDURE, PH NDB DCMSD.

PPHSR09-120

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I feel that AirServices Australia has grossly misled the community regarding the necessity of WARRP. They have always maintained, in answer to all sorts of questions, that it was required for the safety reasons raised in the CASA audit. Under Freedom of Information a copy of this audit was obtained and the only 'safety' issues raised referred to the Runway 03 Instrument Landing System procedures and two RCAs were raised – RCA 0301-02 and RCA 0301-04. That was in 2003 and AirServices Australia has been hiding under this cloak of 'safety' ever since.



I have studied the post WARRP route structure and have put forward to AirServices Australia some suggested changes which are shown below. These suggested routes generally conform to the pre November 2008 routes and obviate the potential conflict between eastbound departures from Runways 03 & 06 and inbound traffic from the North proceeding on the current JULIM THREE arrival (page 12).

### **Suggested Changes to Arrival and Departure Procedures at Perth International Airport to Obviate Current Noise Nuisance**

The changes outlined below would require the establishment of six new waypoints to facilitate these altered routings. These would be:

BRIEN	S31 48 04	E116 07 30
MANDY	S31 54 07	E116 02 45
BLING	S32 08 30	E115 45 53
SUNNY	S31 53 37	E115 48 02
RAFTA	S31 54 08	E115 49 05
POSTA	S32 01 05	E115 48 05

(all co-ordinates expressed in Degrees, Minutes and Seconds)

The current SIDs (Standard Instrument Departure) that would require change are:

**AMANA TWO RWY 03 & 06**  
**RAVON TWO RWY 03 & 06**  
**RWYS EAST (JET) (RNAV) RWYS 03 & 06**

The current STARs (Standard Arrival Route) that would require change are:

**WOORA ONE**  
**JULIM THREE RWY 03 & 06**  
**CONNI TWO RWY 03 & 06**

#### **AMANA TWO DEPARTURE (JET)**

##### **RWY 03**

- Track 016 to MIDLA
- Turn RIGHT, track 063° to BRIEN
- Turn RIGHT, track 085° to AMANA  
Thence as cleared

##### **RWY 06**

- Track 061° to MANDY
- Turn LEFT, track 033° to BRIEN
- Turn RIGHT, track 085° to AMANA  
Thence as cleared

#### **RAVON TWO DEPARTURE (NON-JET)**

**RWY 03**

- Track 016°
- At 1000FT but not before DER (1.1 DME)
- Turn RIGHT, track DCT to BRIEN
- Turn RIGHT, track 062° to RAVON  
Thence as cleared

**RWY 06**

- Track 061° to MANDY
- Turn LEFT, track 033° to BRIEN
- Turn RIGHT, track 062° to RAVON  
Thence as cleared

**RWYS EAST (JET) (RNAV)****RWY 03**

- Track 016 to MIDLA
- Turn RIGHT, track 063° to BRIEN

**RWY 06**

- Track 061° to MANDY
- Turn LEFT, track 033° to BRIEN

**From BRIEN**

- Track 082° to MECKI
- Turn RIGHT, track 111° to NRB NDB

Then as per original SID

**ARRIVAL:****WOORA ONE**

From WOORA track 238° to RAFTA

**RWY 03 VISUAL:**

- From RAFTA turn LEFT
- Track 189° to POSTA
- Turn LEFT, track 106° to 5NM final (5.8DME)

**RWY 06 VISUAL:**

- From RAFTA turn LEFT
- Track 189° to PH R-273°
- Turn LEFT, Track 150° to 5NM final

**ARRIVAL: JULIM THREE (JET)****RWY 03:** From JULIM, track 210° to WOORA

- Turn RIGHT, track 234° to HAIGH
- Turn RIGHT, track 243° to SUNNY
- Turn LEFT, track 191° to BLING
- Turn LEFT, track 106° to HARMIN
- Turn LEFT, track 016° to TIMMY  
Intercept LOC RWY 03

**RWY 06:** From JULIM, track 210° to WOORA  
•Turn RIGHT, track 234° to HAIGH  
•Turn RIGHT, track 243° to SUNNY  
Expect radar vectors for VOR RWY 06

**ARRIVAL: CONN1 TWO (NON-JET)**

**RWY 03:** From CONNI, track 228° to WOORA  
•Turn RIGHT, track 234° to HAIGH  
•Turn RIGHT, track 243° to SUNNY  
•Turn LEFT, track 191° to BLING  
• Turn LEFT, track 106° to HARMIN  
• Turn LEFT, track 016° to TIMMY  
Intercept LOC RWY 03

**RWY 06:** From CONNI, track 228° to WOORA  
•Turn RIGHT, track 234° to HAIGH  
•Turn RIGHT, track 243° to SUNNY  
Expect radar vectors for VOR RWY 06

End of Submission.