

Senate Standing Committee on Rural and Regional Affairs and Transport
Inquiry into the effectiveness of Airservices Australia's management of aircraft noise.

This submission is on behalf of Peter & Patricia Bourne. We live in Glen Forrest, Western Australia. Glen Forrest is approximately 12 km ENE of Perth Airport.

Early in March 2009 we became aware of a high number of large aircraft flying in a southerly direction over our property at Glen Forrest. We have lived at this property for 26 years & in the past there has only been a small number of small / medium size aircraft flying over, usually east west or vice versa. There was no established flight path over Glen Forrest. Immediately prior to noticing the high number of large aircraft flying south, maybe 2-3 months, there had been the rare large aircraft on the same route. We put this down to training flights.

As country people, we did not wish to live in suburbia proper but to have the peace & quite of a village within striking distance of the city. One of the things we considered, having lived near a flight path for a short time before, was whether the area was on a flight path, it was not. By the by, the land was once a gravel pit & over the years we have put in a great deal of work to establish gardens that we thought we could enjoy in our retirement. This is the S.W. of Western Australia, one of only six places in the world to have a Mediterranean climate; hence a great deal of time is spent outdoors enjoying it. It was therefore a shock to find out that, without any prior notice or consultation, a flight path had been routed over us, thus seriously interfering with our life style & to say nothing of the devaluation of our property.

We first rang Perth Airport to find out what was happening; they gave us Airservices Australia's (ASA) Noise Enquiry Unit's (NEU) telephone number. On contacting the Noise Enquiry Unit the first question we asked was are we now on a flight path, the female operator asked our address, said she would check & almost immediately said that yes we were now on a flight path & that there had been major changes made in November 2008 to flights into & out of Perth Airport. It would appear that we were not immediately affected by these changes, other than what we thought were training flights, because the new route would be used when the wind was from the Northern sector & the winds during the summer are mainly from the South West.

When asked what could be done she suggested we contact our local M.P. which immediately gave the impression that ASA's Noise Enquiry Unit was only a filter & there was no hope of ever contacting someone of authority. This has proved the case as the only way to get a written response from ASA management is to write to the Minister, even that takes weeks & when it does arrive the information is, to say the least, confusing. ie. In a letter from Mr Richard Dudley, General Manager Corporate & International Affairs, he comments on a suggestion to move a new arrival flight path – that uses the southern end of the runway to land - further away from the airport to the east. He states that it is better to have it close to the airport as it allows aircraft departing to the south to gain altitude more quickly thus reducing their noise impact. Firstly, why would aircraft be taking off from the southern end of the runway when other aircraft are landing at that end – aircraft land & take off into the wind. Secondly, if that was to happen, surely it would be better to have a cross

over point further from take off therefore giving the aircraft more time to climb & thus produce less noise. In the same letter a runway was incorrectly numbered. Much of the information in this letter was the same as in an earlier letter written by Mr Paul Dawson to a fellow complainant, some of it obviously having been copied & pasted. As a guess, it would appear that both gentlemen have confused their north & south's as well as geographic locations. Not good considering the industry they work in, no wonder the lay members of PANMCC were not aware of flight path changes if this is the calibre of the information dispensed. (See "Doc # 1a & 1b ASA letter 12/08/09")

It has been impossible for the local media to interview anybody from ASA, they only issue statements, mainly to pet aviation journalists. One local journalist, Louise Bettison from the "Hills Gazette", described a conversation she had with ASA as bizarre. ABC Radio had no luck at all in trying to interview them. The statements, along with any written correspondence from them, follow the same tired format. ie. All members of PANMCC were kept fully informed & ASA follows a tried & tested National format. This format obviously works very well for ASA & its customers but not at all well for the public.

ASA's use of highly technical language (Techno Babble) is either deliberate or, to give them the benefit of the doubt, is caused by being insulated from mainstream society whereby they cannot impart information in a language lay people can understand. Either way ASA has foisted onto a large number of unsuspecting people a very bad situation without them being allowed a say in the matter. This should not be possible in a Democratic country like Australia & the situation should revert to the status quo to allow for proper consultation & mediation to take place. Others have tried speaking to the Federal Ombudsman but to no avail. ASA's lack of communication skills & / or arrogance beggars belief.

ASA has ignored some of its own "Environmental Principles & Procedures for Minimising the Impact of Aircraft Noise"

Principal 1 Noise abatement procedures should be optimized to achieve the lowest overall impact on the community.

Principal 2 Noise should be concentrated as much as possible over non-residential areas

Principal 3 Noise exposure should be fairly shared whenever possible.

Principal 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 old flight paths had been to the west of the airport for decades - See Doc # 1a & 1b ASA letter 12/08/09, Doc # 5 Fig 5 Jet arrivals 2/6/08 to 8/6/08, Doc # 6 Fig 6 Jet departures 2/6/08 to 8/6/08 & Doc # 8 New Flight Paths)

Principal 12 To the extent practicable, residential areas overflowed by aircraft arriving on a particular runway should not also be overflowed by aircraft departing from the runway in the reciprocal direction.

ASA's oft repeated statement that there was adequate consultation with the community via members of the Perth Airport Noise Management Consultative Committee (PANMCC) is not true. The form the consultation appears to have taken is to issue diagrams that are just a mass of lines that a lay person (community committee members) would have no hope of understanding, there were no named locations marked (town sites, suburbs etc) that would have made sense to them, leave alone any markings for proposed flight paths over these locations. There was consultation of sorts but it was definitely not adequate. In fact a district greatly effected by the new flight paths, the City of Armadale, did not even have a representative on the PANMCC. Given their distance from Perth Airport that is not surprising. Unless they were informed by ASA that a flight path was to be directed over them they would take no interest in the happenings at Perth Airport. (See Doc 8 New Flight Paths).

We asked one of ASA's NEU staff (Viv) for copies of any map(s) showing the new proposed flight paths that may have been used during the community consultative process, after some delay he established that there were no specific maps that identified the changes. (See "Doc # 2 Map(s) of Proposed Flight Path Changes")

The lack of detail supplied by ASA to the members PANMCC is in sharp contrast to what can be obtained from their web site through the use of "Webtrak". The track, height & angle of an aircraft can be given to the nearest metre from any given point. ie. Our property. We appreciate that "Webtrak" is a tracking device but we are sure that similar technology must be used to model proposed flight paths which would mean that much more explicit information could have been given to the members of PANMCC to pass on to the community. In fact ASA commenced simulator trials on 27th November 2006. Given that ASA had a computer simulation that would provide them with the confidence that the new routes were safe and would meet the projected load, surely it would have been simple to sit the committee members in front of a screen and explain the process to them &/or give them printouts of the simulation showing geographic locations with accompanying explanations. That would have been acceptable consultation, and the members could then have gone on to inform their constituents of the impact on their communities. With modern navigational aids the flight paths are very precise & it is possible to say exactly which households would be affected. This is contrary to Principle 3.

Mr John MacPherson, the Principal Environmental Noise Officer from the Western Australian Department of Environment & Conservation, stated in an email to PANMCC members on 30 July 2009 :-

The consistent impression given by ASA that the changes would only occur at distances well away from the airport was ultimately misleading, and led the Committee to a view that the changes were not likely to significantly impact any particular group.

The quality of information provided by ASA on the WARRP website was clearly inadequate to enable non-aviation experts to identify or evaluate the likely impact.

Any lay member of PANMCC contacted by members of the community have said that they had no idea that there would be changes that would affect people in the area they were there to represent. This included Politicians from both sides of politics.

We have no doubt that ASA will take the tack that they have made a mistake & will try harder in future but unfortunately it is now too late to go back to the pre November 2008 flight paths. In fact Mr Russell, CEO of ASA, said in Senate Estimates :-

These airspace concepts can be very technical and difficult to understand and I think the lesson from our viewpoint is that we need to ensure that the information is understood, rather than just assuming that no feedback on it is in fact equal to understanding.

If a mistake has been made then it should be rectified from its inception not just in the future. The current situation is much, much more than just a simple mistake. It could be deemed malfeasance.

When enquires were first made as to why the changes had been necessary ASA implied that after a CASA audit in June 2003, changes had to be made for safety reasons. (Always a good ploy, stick a safety label on something liable to prove unpopular). When the Audit Report was obtained under FOI it showed that only two matters required immediate remedial action to bring operations within safe parameters, hardly a major safety situation.

Our local MP, Ms Judi Moylan, who obtained the report, was advised that all the changes brought about by the Western Australian Route Review Project (WARRP) were necessary as “the Civil Aviation Safety Authority found changes to air routes were required to maintain safety, reduce complexity & cope with rapid & predicted continued increase in air traffic”.

These changes, whilst no doubt giving safety a high priority, are financially & operationally driven & given that the community was not involved the WARRP is biased to ASA’s main customers, the airlines & airport, & themselves. The airlines want the shortest possible route, the airport wants the quickest turn around time & ASA wants a standard, one size fits all, idiot proof air traffic control system Australia wide so that Air Traffic Controllers can be shifted around with ease. All of this makes good business sense, but if changes impact adversely on the general public then these organisations are not good corporate citizens & should be reminded it’s not all about them & that we live in a Democracy.

ASA may receive \$770 million per annum from the airlines & airports but they should not be ASA’s only consideration, other companies are held accountable before the Law. ie. Consumer protection, fair trading etc.

ASA consistently says it’s all about safety, nobody disagrees with that, but as the majority of departures & arrivals at Perth Airport are from the north or the east, how is it safer to move an arrival flight path from the west side of the airport to the east side where it then crosses or heads towards departing flights? The old flight path to the west had been there for

decades – Perth Airport began civil operations in 1944 – so a large proportion of residents to the west would therefore have been aware of the noise before moving in. (“Environmental Principles & Procedures for Minimising the Impact of Aircraft Noise” – Principal 11). It also passed over the sea at some points. (See Doc # 5, Fig 5 Jet arrivals 2/6/08 to 8/6/08, Doc # 6, Fig 6 Jet departures 2/6/08 to 8/6/08 & Doc # 8 New Flight Paths).

If it is imperative that the arrival route be changed to be east of the Airport then there are other routes that could be used, they may be marginally less efficient than the present new route but would take into consideration the quality of peoples lives & cause less problems in the future. ie. To the east of Glen Forrest for some considerable distance is State forest which is also a catchment area for a major dam, nobody will ever live there so therefore the area will never be a source of complaints irrespective of how much air traffic may increase in the future. The incoming flight path that now travels south along the Darling Scarp & over Glen Forrest, Paulls Valley, Hacketts Gully, Bickley, Carmel & Pickering Brook could be moved approximately 22 kilometers to the east of Glen Forrest thus returning these places back to the peace & quiet which was one of the reasons we choose to live here. The proposed flight path would cross an out going flight path that heads east approximately 85km (45nm) from touchdown. The outgoing aircraft are at about 10,000ft whilst the incoming aircraft would be at between 13,500ft & 15,000ft.

(A large jet aircraft requires 3 to 3.3nm to descend 1,000ft comfortably). This proposed flight path would also eliminate the need for aircraft arriving from the east having to backtrack eastwards when they head south. (See Doc # 8 New Flight Paths).

This option has been put to ASA but they dismiss it saying that the outgoing aircraft would have to stay low till they are past the cross over point therefore making it noisier for residents in that area. (Comments like that are designed to make you feel bad about pushing the problem onto others). The minimum vertical separation between aircraft is 1,000ft. There would be a minimum of 2,500ft between aircraft at the crossover point. Nobody expects ASA to willingly agree to any changes now, especially if it involves expense to its customers & itself. Mr Richard Dudley has stated publicly that there will be no rollback.

We believe the above option was the subject of the comments made in the letters from Mr Dudley & Mr Dawson in August 2008. See attached “Doc # 1a & b ASA letter 12/08/09”

ASA’s publication “Environmental Principles & Procedures for Minimising the Impact of Aircraft Noise” has as Figure 1 (Page 13) a “Flow Chart for Noise Impact Assessment for New or Modified Jet Aircraft Tracks.” (See Doc # 9 Flow Chart)

If this flow chart is applied to the new flight path travelling south along the Darling Scarp it is found that a Full Noise Impact Assessment is required once it is south of the Great Eastern Highway, as the majority of aircraft using it are below 5,000ft Above Ground Level (AGL) or the number of operations are greater than the minimum in Table 1(See “Doc # 3 Arrival Fights – 1hr sample”).

In the same publication under “Part B” (Page 3) A : Jet Aircraft, Item 2 - it states that : “A height of 5,000ft AGL is considered to be the minimum acceptable altitude for the avoidance of significant noise impact on residential populations by jet aircraft. In all instances standard departure & arrival procedures should be designed to ensure that jet aircraft do not overfly residential areas at altitudes below 5,000ft AGL etc.”

If the above cannot be achieved, then Item 3 states :-

“Where jet aircraft flight below 5,000ft AGL is unavoidable, procedures are to be designed with due consideration for the preferences of the affected community, as determined through a process of consultation with community representatives, in determining which areas will receive greater noise exposure where there are mutually exclusive options for the flight tracks”.

It is a fact that people have differing tolerances to noise. The reason a great many people live in the Perth Hills is they do not like noise, therefore because the area is quiet any intruding noise is worse than if it were to happen in a noisier area. ie. a city were there is a lot more ambient noise. A fact that does not seem to have been considered by ASA as Mr Dudley enthusiastically points out in his letter than a great number of aircraft no longer fly over the western suburbs of Perth. (See “Environmental Principles & Procedures for Minimising the Impact of Aircraft Noise” Principle 11).

Prior to the new flight path crossing the Great Eastern Highway it passes over the John Forrest National Park. Mr Richard Dudley places great store in this (see Doc # 1a & 1b) even though in the Civil Aviation Safety Authority’s (CASA) publication “Environmental implications guidelines” (see Doc # 7a & 7b) under the heading “Noise in the National Parks System & Heritage Listed Areas” it states “Noise within National Parks system often interferes with the very reason visitors go to the National Park – for peace & quiet”. In fact this new flight path passes directly over the main recreation area of the Park whilst another new outbound flight passes within approx 1nm to its north at around 3,000 – 3,500ft. Another example of the public coming a very poor second & ASA management not appearing to know its obligations.

As reported in the minutes of Perth Airport Noise Management Strategy Committee’s (Later Perth Airport Noise Management Consultative Committee - PANMCC) meeting on 4th October 2006 (See Doc # 4a & 4b) concerning a presentation by ASA on the WA Route Review Project (WARRP), Mr Gavan Bennett explained (see 5.3) ASA’s process for Environmental Assessment for proposed changes to flight tracks & how if a location was deemed environmentally significant the proposal was referred to the Department of Environment & Heritage for assessment.

Mr Stuart Devenish (City of Canning) requested (see 5.5) that the environmental reports be made available to committee members, in time to make comment, prior to track changes being adopted.

Although not normally public documents, ASA may release them to committee members if the committee formally requested them. Mr Torben Petersen (Chairman) was to formally request them for the committee (see 5.6).

To date they have not been received from ASA, even though, according to M’s Sharon Davies (Mundaring Shire PANMCC Representative), they have been asked for on at least two further occasions.

The idea of changing the committee’s name to include the word “consultative” appears to have been only so much spin.

In his “Statement of Expectations” dated 12th March 2007 to the then Chairman of ASA, the Minister of Transport & Regional Services, the Hon. Mark Vale, made it clear that he

expected ASA to balance its commercial objectives with its obligations to the Government, aviation industry & the community.

The current Minister, the Hon. Anthony Albanese, in his “Statement Of Expectations” (November 2008 – the time of the WARRP implementation) expects ASA to :-

Item 3 Support the Governments initiatives in relation to climate change & aircraft noise management. This includes the maintenance & appropriate resourcing of the Noise Enquiry Unit.

(We would think that the noise management aspect would be very important to the Minister & the Prime Minister giving their involvement with the noise issues at Sydney & Brisbane Airports earlier in the decade).

Item 9 Adhere to values & a code of conduct that maintains high standards of professionalism, customer service, probity, reporting, accountability and transparency consistent with the Governments aim of excellence in the public sector.

Item 10 Actively engage with Government, commercial, industrial, consumer & other relevant bodies in a timely manner.

With regard to the Noise Enquiry Unit, as previously stated, it is a filter & little more than a call centre which collects numbers to be flicked on to the airports concerned who then table them at a Aircraft Noise Management Consultative Committee meetings, the very people who represent the public so the complaint has done the full circle – Catch 22.

These statistics appear to be used to gauge a level of tolerance to establish what can be got away with as ASA does nothing constructive with the complaints received; in fact it issues categorical statements saying that no changes will be tolerated.

In fairness to the NEU personnel they do try to answer questions if they have time but they are in reality only sacrificial offerings to the appearance of accountability, probity, transparency & service.

It is hoped that the complainant will surrender from exasperation whereas the proper & respectful resolution of complaints is often the basis of improvement & progress. A concept ASA may consider implementing.

We believe that the above submission addresses the points to be considered by the Committee as follows :-

- (a) No. For non- aviation industry PANMCC members the language used has been too technical, the use of simple simulations, diagrams &/or maps was not employed, information was misleading & some communities effected were not represented on the PANMCC. Any assessments done were not presented to the PANMCC. Information had to been obtained by resorting to the use of the FOI Act.
- (b) Unknown. Any engagement seems to have been biased to the needs of the aviation industry & ASA.
- (c) Does not appear to have. If there are then the procedures used by ASA are not compliant. They first must have the will to use the triggers.
- (d) No. MP’s & the Federal Ombudsman cannot get answers from them & the NEU is only a statistical gathering unit. Does ASA have a meaningful noise management strategy?
- (e) No. The new flight paths are so precise the same properties are effected over & over.

- (f) Definitely required & should include avenues for mediation. There should be an Ombudsman independent of ASA who is powerful enough to get answers.
- (g) Is it time to consider moving Pearce & Perth Airports before Greater Perth gets much bigger, the noise impact becomes intolerable & the air traffic control problems become unmanageable? Pearce's main roll appears to be to train foreign pilots, as should there ever be a threat from the North it will be too far away from the action. Therefore should safety & peoples way of life be compromised so the Military can earn a few Dollars?

End of Submission.