SUBMISSION IN RESPONSE TO AUSTRALIAN SENATE STANDING COMMITTEE ON RURAL AND REGIONAL AFFAIRS AND TRANSPORT - INQUIRY INTO AIRSERVICES AUSTRALIA'S MANAGEMENT OF AIRCRAFT NOISE

### **BACKGROUND:**

The City of Canning is located in the Perth Metropolitan Area, Western Australia. The City is impacted upon by aircraft movements associated with Perth International Airport to the north east of the City and Jandakot General Aviation Airport to the west. The areas of the City of Canning in proximity to these airports are built up and include substantial areas of low to medium density established housing. In relation to aircraft noise impacts the City is represented on the Perth Airport Noise Management Consultative Committee and the Jandakot Airport Consultative Committee.

### SUBMISSION:

## Need for Independent Body to Manage Aircraft Noise:

It is recognised that Airservices Australia's operational priority is the safe and efficient management of air traffic. Whilst their jurisdiction includes the protection of environment from the effects of aircraft operations, these objectives clearly are given less priority. Whilst there is no argument that the safety of aircraft operations is paramount in managing the aviation industry it is believed that the current structure does not present suitable opportunity for options to be explored which may provide improved environmental outcomes (including attention to aircraft noise) whilst maintaining appropriate attention to safety. On occasions Airservices Australia can appear autonomous in their approach to implementing operational changes to aircraft flight paths and operations. Proposals are often justified on overly complex technical grounds and/or undisclosed safety arguments.

The objectives within Airservices jurisdiction are conflicting and competing and it is considered that under this structure, environmental impacts of aircraft operations, including noise, are not suitably being represented. It is considered that an independent authority is required to ensure aircraft noise impacts are suitably represented in relation to flight path/operational changes.

# Safety V Noise Impacts and the need for Additional Transparency and Regulation of Changes to Flight Paths:

The City of Canning's experience on a number of occasions with respect to operations at Perth and Jandakot Airports is that the "safety argument" is used by Airservices Australia to discount serious consideration of alternative flight path and/or operational initiatives which may reduce noise exposure. Details of the "safety argument" are generally unavailable for "confidentiality" reasons and accordingly it is difficult for the community to scrutinize or challenge the reasons being put forward to justify an existing or proposed flight management measure.

It is recommended that flight path changes with the potential for increased noise exposure be subject to a comprehensive regulatory process. It is suggested that measures be put in place which require Airservices Australia, or an alternative independent body, to provide details of the justification behind flight paths changes including details demonstrating assessment of alternative options. Proposals should then be subject to a regulated consultation process which includes the ability for stakeholders to seek additional clarification to details raised. It is recommended that final approval for any flight path change with noise or environmental implications be made by an authority independent to Airservices Australia.

## Overhaul of Indicators for Noise Exposure:

Communities subject to flight path changes and/or increased noise impacts require an understanding of the nature of the noise environment which they may be exposed to. In this regard the ANEF (Australian Noise Exposure Forecast) system for land use planning is recognised as being flawed in terms of assessing impacts, particularly with respect to general aviation airports such as Jandakot. The compilation of ANEF forecasts is complex and the technical nature of the forecasts makes their content largely resistant to scrutiny or challenges by local governments or the community.

In consulting with the community a package of easy to understand indicators of forecast noise exposure is required. This approach is likely to require an overhaul of the ANEF system and perhaps wider use of decibel related noise indicators (eg N70 noise exposure mapping).

## Need for a Regulated Community Consultation Charter:

Changes to flight paths are regular cause of increased aircraft noise complaints within the City of Canning. Current consultation processes associated with review of flight paths and proposed changes are flawed. A regulated system of consultation is recommended with respect to the review or implementation of flight path changes where there is potential for noise impacts. Changes and any likely impacts need to be presented in a manner which the general community can understand. Extensive use of jargon, technical language and dismissal of alternatives due to undisclosed safety audits or technical considerations is not suitable. Reasons for the changes and consideration of alternative options need to be provided to the community using non technical language and easy to understand plans.