

**To: Senate Standing Committee Inquiry into the Effectiveness of
AirServices Australia's Management of Aircraft Noise**

Submission Supplement, Moorabbin Airport, Victoria, Aspendale Resident

Summary:

- 1) Even in the unlikely event that the community can assemble data relating to the impact of aircraft noise on the local community it is still impossible to use this data to discuss, investigate or implement any form of noise abatement processes or procedures with any of the aviation stake holders including AirServices Australia.
- 2) Within the coastal corridor of the Moorabbin Airport Control Zone, aircraft operate at the lower limits and absolute basic requirements of VFR which is an inadequate set of guidelines in terms of protecting the community from noise pollution or providing the community with any default fly neighbourly spirit.
- 3) There are aviation practices like formation flying which occur within the Moorabbin Control Zone and over homes. These practices place an additional noise burden on the community. As with all noise complaints AirServices Australia does not appear to know how to deal with the matter and the issue of noise from formation flying is not covered by Civil Aviation Regulations nor by Air Navigation Regulations.
- 4) The community does not need another report which recommends consultation between residents and aviations interests. Talk has become cheap. The community needs a set of standards and outcome statements which relate to community amenity, quality of life and property rights particularly in areas where discretionary, recreational and or non-essential general aviation is occurring.

It is difficult for the public to visually identify aircraft for the purposes of raising noise or safety concerns. This is made harder by the fact that most aircraft do not use their transponders in the Moorabbin Control Zone, meaning that they do not appear on AirServices flight charts or the AirServices Webtrak system.

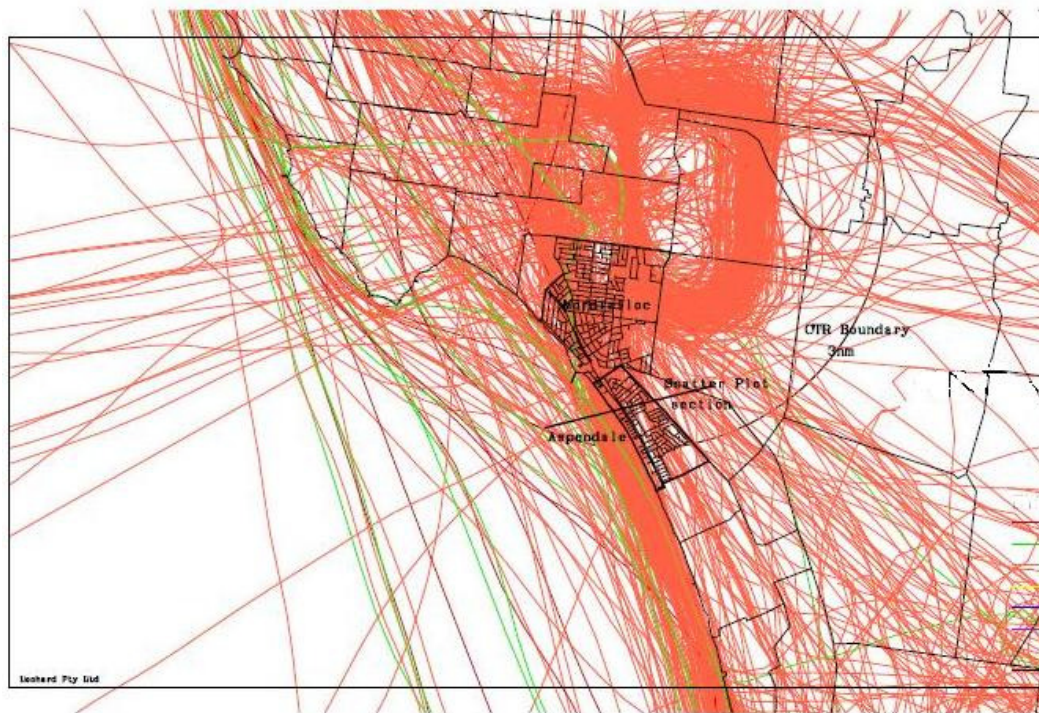
Very occasionally it is possible to make a sighting and have it confirmed by an AirServices Australia chart, as was the case below. The chart below was supplied after a complaint about a helicopter flying low over North Aspendale on route from Moorabbin Airport towards the coast. This helicopter had reached a token 497 feet just as it passed over the North Aspendale beach. AirServices has said that it cannot identify the aircraft in these charts (not even whether it is a plane or a helicopter), so it comes down to the word of the observer and whatever other confounding activity is happening in the area at the time. From previous experience, once pilots get word that a resident has complained using transponder chart data it becomes impossible to track the same aircraft again because on future occasions pilots turn off their aircraft transponders. There have been one or two occasions, after complaints, when helicopters have hovered low and loudly over homes in Aspendale in what for all intents and purposes has appeared to be a display of defiance or an attempt to intimidate residents. Of course these presumably delinquent aircraft have their transponders turned off and do not appear on AirServices charts.



(Helicopter at 497 feet over Aspendale at 10:55am, Australia Day 2010)

It is not unusual for helicopters of all types to fly at only a few hundred feet over homes in the Moorabbin Control Zone and they justify their actions on the basis that they are either on approach or departure from the airport and are either flying to or coming from the coast. Notwithstanding a 500 feet altitude over the bay, technically these helicopters can fly at any height during their coastal approach or departure. Moreover it is not surprising that they regularly toy with such low altitudes because they have been unwisely granted a separation altitude of only 700 feet despite being some of the noisiest aircraft in the sky.

Clearly helicopters place considerable noise imposition on the community when flying at only a few hundred feet or even at only 700 feet. If it were a once off experience it might be tolerable but it is part of an ongoing procession of aircraft which exploit the coastline, as shown in the chart below. Many of these aircraft are regulars, obviously having selected the coastal route for some form of training, recreational or scenic purposes and apparently not inclined to alter routes, altitudes or frequency in a voluntary fly neighbourly gesture.



(Flights for one day – only a fraction of the flights are shown because of lack of transponder use in the Moorabbin Control Zone)

CASA is not interested in the above charts because the aircraft can justify their low altitudes within the existing and inadequate VFR guidelines, moreover CASA has announced that it has no role in issues relating to aviation noise in terms of community amenity and CASA will not enter into discussion about rationalisation of flight routes, it claims that all of these issues are part of the AirServices remit.

In the year and a half that I have been asking for flight charts like the ones above not once has AirServices suggested a sensible approach for actually dealing with the noise problems aside from suggesting that I approach the airport or the pilots. The views of the pilots can be seen in the many online chat sites where the basic sentiment is “the airport was here first and if you don’t like the noise move”. The airport (MAC: Moorabbin Airport Corporation) refers complaints back to AirServices or CASA or RAPAC and so the whole exercise goes round in circles. The added twist is that MAC asserts that it is not responsible for what aircraft do once they have left the ground even though it is the incubator for the whole aviation business in the area.

As another example of uncontrolled aviation noise, the picture below shows formation flying directly over Aspendale homes. Aside from safety concerns, formation flying is considerably noisier than single aircraft movements. These aircraft can sometimes be seen flying in formation on approach to the airport at whatever altitude they choose, sometimes also leaving their break away until quite late in the approach. Once again there is no definition of what is an acceptable altitude for formation aircraft in the Control Zone on approach or departure. In the example below none of the aircraft were using transponders and the event did not appear on any AirServices charts. AirServices maintains that the rules relating to formation flying are a CASA concern (reg 163AA) but this regulation does not deal with where formation flying can occur or how noisy it can be and again CASA is not concerned about the effects of aviation noise on the community. It is interesting that regulation 163AA does refer to the notion of the multiple aircraft operating as one and yet there is no consideration of multiple aircraft noise emission standards in the Air Navigation Regulations (1984).

If this formation flying had occurred over the considerable expanses of nearby industrial estates and semi-rural allotments the noise might not have compromised the community to the extent that it did. In the chart above there is a broad area of semi-rural and industrial land in the vicinity of the notation “*OTR Boundary 3 nm*”; paradoxically the density of movements (red lines) in this unpopulated area is considerably less.



The community does not need another report which recommends consultation between residents and aviations interests. Talk has become very cheap. The community needs a set of standards and outcome statements which relate to basic amenity, quality of life and property rights. For the Moorabbin Airport in particular we are talking about discretionary, training, recreational and non-essential general aviation and there are solutions to most of the noise issues but these will not surface

while aviation interests have profound priority over community interests. Nor will they surface while the various aviation reports propose charters and visions for the future of aviation and little more than vague references to the concerns and interests of the community with obscure suggestions about how departmental responsibilities and appointed channels of communication and cute tools like Webtrak will somehow solve community problems.

The recent White Paper into Aviation opens with the following:

Safe, efficient and competitive air services are essential to Australia's economy, people and communities. The Australian Government believes that a comprehensive long-term aviation policy framework is needed for the continuing development of this major industry. (p 24)

This is very encouraging for aviation but on every occasion in the 161 page White Paper whenever the community is mentioned it is in terms of finding a way to fit it in around the interests of aviation. Where is the environment, health and amenity (noise) statement for the community which acts as a reality check for aviation activity and investment before there is even consideration of aviation expansion and the introduction of subsidised double glazed windows or roof insulation!

Where is the following statement and why isn't aviation backed into community considerations rather than community wellbeing and rights being backed into aviation:

Safety, quality of life and certainty over environment and property enjoyment are essential to Australia's economy, people and communities. The Australian Government believes that a comprehensive long-term community amenity policy framework is needed for the continuing wellbeing and happiness of our society.

C. Williams
(Submission Supplement)