

7th January 2010

Committee Secretary,
Senate Rural and Regional Affairs and Transport
References Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Sirs,

Senate Inquiry into Airservices Australia's Management of Aircraft Noise.

This submission is made by Moorabbin Airport Corporation Pty Ltd, the Airport Lessee Company for Moorabbin Airport.

The purpose of the Committee is to inquire into the effectiveness of Airservices Australia management of aircraft noise and we would presume that this reference relates to Ministerial Direction M37/99 which requires Airservices Australia to

- (iv) *Undertake monitoring, testing and compliance activities associated with the Air Navigation (Aircraft Noise) Regulations and the Air Navigation (Aircraft Engine Emissions) Regulations.*
- (v) *Develop and implement effective aircraft noise abatement procedures and monitor and report to the Secretary on compliance with those procedures at Australian airports.*
- (vi) *Provide advice and information on aircraft environment related matters to, and participate in, airport consultative committees at those Australian airports that have such a committee.*
- (vii) *Provide, maintain and enhance public response and reporting services through a dedicated Noise Enquiry Service at airports covered by the Airports Act 1996 and other major Australian airports.*
- (viii) *Install, maintain and operate noise and flight path monitoring systems at major Australian airports.*
- (viii) *Monitor, collate and report to the Secretary on aircraft movements during curfew hours at Sydney (Kingsford Smith), Adelaide and Coolangatta airports.*
- (ix) *Make available data for the development of aircraft noise exposure analyses and prediction and be responsible for endorsing Australian Noise Exposure Indices/Forecasts for all Australian airports.*

Our submission will focus on the above requirements, to the extent that they affect Moorabbin Airport.

1. Moorabbin Airport Background and Noise Issues.

Capital city general aviation airports (GAAP) are an important piece of local, state and national infrastructure. Those airports, such as Moorabbin, Jandakot, Parafield, Bankstown and Archerfield, have provided the primary pilot training venue for Australia's aviation industry. Over recent years, flying training for international students has increasingly become a significant part of this training effort.

This has helped to improve the viability of local flying schools, provided employment for local instructors, engineers and others and contributes to the maintenance or improvement of standards internationally.

The role of such airports has recently been recognised in the National Aviation Policy Statement White Paper:

The Government will ensure Australia's capital city general aviation airports, so important for the industry's future prosperity, will remain as fully operational airport sites, with their primary purpose the provision of aeronautical services. These objectives will be ensured through more detailed master planning processes for the leased federal airports which will improve oversight for the Commonwealth Minister. The overriding principle will be the primacy of aeronautical uses for airport sites. While there may be some capacity for niche airline services and commercial developments at secondary capital city airports there is no doubt that master plans for these airports should reflect a vision for a thriving general aviation sector

Moorabbin Airport Corporation (MAC) is an airport-lessee company and has an obligation to use the airport site as an airport under the *Airports Act 1996*. MAC's role is to manage the airport infrastructure and our environment strategy, approved by the Minister, is confined to sources of environmental impact associated with airport operations within the boundaries of the airport site.

MAC has no jurisdiction over aircraft in flight but cooperates with the relevant authorities in the development and promulgation of practices to reduce the environmental impact of aircraft in flight, around the airport.

The **Civil Aviation Safety Authority** has a dual role through safety regulation of flying activities and the Office of Airspace Regulation (OAR), responsible for exercising CASA's authority for airspace management.

While CASA's policy requires that "airspace management must be conducted to provide the most efficient use of airspace consistent with the safe operation of aircraft", CASA must exercise its powers and perform its functions in a manner that ensures that, as far as is practicable, the environment is protected from the effects of the operation and use of aircraft; and the effects associated with the operation and use of aircraft (*s9A Civil Aviation Act 1988*). CASA's environment policy provides commitments to all activities that CASA can control and influence.

Airservices Australia operates the Control Tower at Moorabbin Airport. During the hours of operation of the Control Tower, ATC processes aircraft to maintain safety standards, issues relevant instructions to regulate traffic and implement noise abatement practices and monitors aircraft compliance.

2. Noise Enquiry Services

Day to day responses to community enquiries or complaints about aircraft activities can involve any of the three agencies, airport management, Airservices Australia or CASA.

Since 1988 when all elements of aviation regulation and service provision resided within a Commonwealth Department there have been many attempts to find the appropriate allocation of responsibilities between aviation regulator, airspace management service provider and airport operator. As the various functions have become either corporatized or privatised some functions of Government have been left behind or inappropriately assigned.

Responsibility for aircraft noise has never rested comfortably with any agency, mainly because there is little control able to be exercised to the satisfaction of the complainant. Whilst major airports have published noise abatement flight paths and curfew regulations where there may be regulatory oversight and penalty provisions, general aviation operations are more likely to be of a random nature. Although there can be noise abatement procedures that provide for preferred runway directions or limit training hours, as long as the aircraft are certified in accordance with ICAO noise standards and are flown in accordance with statutory heights there is currently no means by which individual aircraft operators are required to account for the noise generated by their operation. The community feels disenfranchised as the reporting agencies are seen to be only gatherers of data.

3. The Role of Airservices Australia.

As long as aircraft are certified in accordance with ICAO noise standards and are flown in accordance with statutory heights, there is currently no means by which individual aircraft operators are required to account for the noise generated by their operation. Therefore, under the current legislative arrangement, Airservices Australia's ability to effectively manage the issue of aircraft noise is limited. This is particularly the case for General Aviation aerodromes where general aviation operations, including training traffic, operate within defined circuit patterns associated with the active runway or on established inbound and outbound reporting points used to provide traffic segregation. When outside 3 nm, aircraft are more likely to be of a random nature, as opposed to major airports that have published noise abatement flight paths and curfew regulations where there may be regulatory oversight and penalty provisions.

Many noise abatement procedures (ie, Fly Neighbourly/Friendly Agreements) that provide for preferred runway directions or limit training hours at General Aviation aerodromes are voluntary and will always be subject to operational constraints. Only airport curfews can dictate whether an aircraft can operate or not and this is a matter for Government policy.

Published instrument procedures ensure more accurate aircraft tracking and therefore flight paths are more predictable. Visual flight will always result on more random operations and GAAP are predominately operated under Visual Flight Rules.

Access to the Noise and Flight Path Monitoring System (NFPMS) and ATS radar systems do enable Airservices Australia to provide information to respond to community enquiries. However, this is only provided for Adelaide, Brisbane, Cairns, Canberra, Coolangatta, Melbourne, Perth and Sydney and secondary airport traffic is only captured as a consequence of this monitoring. For this service to be effective, operators must be familiar with operations and practices at each aerodrome. The centralisation of Airservices Australia's noise enquiry services to the Sydney Noise Enquiry Unit disadvantages communities surrounding the other Australian airports.

Overall, the current noise enquiry and noise complaint services do not, and cannot, meet community expectations. In the vicinity of airports within coverage of the NFPMS, they only have an ability to identify those aircraft that are transponder equipped. They do not have active involvement with aircraft operating companies or individual flight crews. They appear to merely collect and report data, without having any impact on the operation. The recent development of the "Webtrack" Community Noise information website is a very welcome move. However, information regarding Moorabbin Airport is only available by default, as it is included in the radar coverage area of Melbourne.

Airservices Australia's noise enquiry services capabilities and areas of responsibility should be clearly articulated to the wider community where there is a perceived aircraft noise impact. This may include a community education program where Airservices Australia participates in airport consultative forums and providing information via its website or published material. There is an unrealistic expectation that Airservices Australia, aircraft operators and airports can and should respond positively to any concern expressed about flight paths and aircraft noise when, in the main, current operational practices already make the best of geographic constraints and poor planning decisions around airports through preferred runway schemes, noise abatement procedures and operational restrictions.

It is important, however, to consider the scale of community concern. Moorabbin Airport Corporation typically receives some 15-20 calls or emails per month during Summer regarding aircraft noise. The Noise Enquiry Unit receives a similar figure. During the public consultation phase of the Moorabbin Airport Draft Master Plan 2009 some 207 submissions were received, of which approximately 150 were related in some way to aircraft noise. These figures should be seen in the context of the urban population of Melbourne, over which aircraft from Moorabbin Airport operate. The population of the City of Kingston alone is 134,626 according to current data.

The responsibility for the management of aircraft noise has been charged to Airservices Australia but it is really a matter for a number of agencies:


- History and Government policy has determined the location of aerodromes and runway geometry is a consequence of annual weather patterns.
- Flight paths are a consequence of the runway in use and runway selection is determined by crosswind or downwind limitations of operating aircraft.
- Aircraft noise levels are determined according to ICAO standards
- Aircraft type selection is a commercial airline or operator's decision.
- Planning policies around airports are determined by State or Local Governments and, historically, have not adequately considered the impact of aircraft operations.

This list could go on. While Airservices can try to explain the operations to the public, they are not really in the position to change operational practices unless required to do so by the policy makers and this is where much of the dissatisfaction is felt by the public.

This concludes our submission to the Senate Inquiry. Moorabbin Airport Corporation does not object to any element of this submission being made public.

Yours faithfully

For Moorabbin Airport Corporation Pty Ltd



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