

Inquiry into the effectiveness of Airservices Australia's management of aircraft noise

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Introduction

On 25 November 2009 the Senate referred the following matter to the Senate Standing Committee on Rural and Regional Affairs and Transport for inquiry and report:

An assessment of the effectiveness of Airservices Australia's management of aircraft noise under its responsibilities to provide air traffic services and protect the environment from the effects associated with the operation of aircraft for which it has legislative jurisdiction.

In undertaking this inquiry, the committee is to consider whether Airservices Australia:

- (a) has conducted an effective, open and informed public consultation strategy with communities affected by aircraft noise;
- (b) engages with industry and business stakeholders in an open, informed and reasonable way;
- (c) has adequate triggers for public consultation under legislation and whether procedures used by Airservices Australia are compliant with these requirements;
- (d) is accountable, as a government-owned corporation, for the conduct of its noise management strategy;
- (e) has pursued and established equitable noise-sharing arrangements in meeting its responsibilities to provide air traffic services and to protect the environment from the effects associated with aircraft for which it is responsible;
- (f) requires a binding Community Consultation Charter to assist it in consulting fully and openly with communities affected by aircraft noise; and
- (g) any other related matter.

This submission is based largely on my experience as a noise specialist and my involvement with the Perth Airport Noise Management Consultative Committee (PANMCC) since 2000.

Submission

Has Airservices Australia conducted an effective, open and informed public consultation strategy with communities affected by aircraft noise?

This part of the submission focuses on the recent WA Route Review Project (WARRP) which was implemented in late November 2008 in relation to flight paths around Perth Airport. A primary aspect of the Airservices Australia (ASA) strategy was to inform the PANMCC of the WARRP, with the intention that the Committee members would in turn inform their contacts.

The outcome was that the implementation of the WARRP resulted in outrage from communities that had not been made aware of the flight path changes and did not accept the impacts. This was evident in a dramatic rise in the numbers of noise complaints to the ASA complaints line during 2009, numerous media articles and calls by elected members for improvements in ASA's approach.

With regard to the *effectiveness* of the strategy, it should first be recognised that the impression given to the Committee (in briefings by ASA or in Committee updates) was that the changes to flight paths would only occur at considerable distances from the Airport. This impression can be gained from the notes from these meetings made by DEC officers (myself and Mr Michael Cake, who has subsequently left the Department) in Attachment 1.

Clearly, the Committee was not adequately alerted to the likely noise impacts of the proposed flight path changes in areas closer to the Airport, and consequently the public consultation strategy was never likely to be effective.

The second issue with the effectiveness of the strategy was that the nature of the information provided on the ASA website describing the proposed flight path changes was too obscure and technical to be of use to persons other than aviation experts. I visited the website several times in response to circular emails advising that the site had been updated. However, I found that the information provided at that time consisted of a 'spaghetti' of flight paths with cryptic descriptive notes, overlaid on a map that did not show landmarks that would have enabled potential noise-affected areas to be identified. Being under the impression that the changes were occurring well away from the Airport, and realising that considerable time resource would be needed to understand the data provided, I did not see any point in requesting further clarification.

Following from the above, the third issue with the effectiveness of the strategy was that, without the Committee having a clear understanding of the potential impacts of the WARRP in noise-sensitive areas, there was little likelihood that the Committee members would have been able to adequately inform their constituents of the rationale, nature and impact of the proposed changes. I would support the position of a number of Committee members who have argued that this was not their role in such a complex matter, and that ASA should have developed its own direct lines of communication to affected communities.

For the strategy to be effective, ASA needs to prepare clear, non-technical information for stakeholders; and establish good lines of communication to ensure that the information reaches all potentially-affected communities and that there is opportunity for meaningful feedback.

The lack of *openness* of the strategy contributed to its ineffectiveness. Apart from the inaccessibility of the information provided on the ASA website, the main lack of openness was in the failure of ASA to release its internal noise assessment report for review by the PANMCC. As noted in Attachment 1, Perth Airport has requested this report on more than one occasion, and to my knowledge, ASA is still considering whether or not to release it. The withholding of an internal report that concludes there are no significant noise impacts does not sit well with the fact that large numbers of

residents in the Hills area of Perth consider themselves to be significantly affected by noise as a result of the WARRP changes.

An open consultation strategy would see these noise assessment reports being released as a matter of course, at least to Consultative Committees such as PANMCC to provide a forum for review. This would have a number of benefits:

- The Committee would have an understanding of ASA's basis for choosing the preferred option and assessing likely impacts;
- The Committee could raise queries about specific base data or noise-sensitive areas where the report may not adequately represent the likely impacts;
- The Committee would be better able to support ASA's assessment; and
- The Committee would be better able to have input to ASA's policy and procedures, and thereby to improve the assessment process.

It is apparent from the above comments that the ASA public consultation strategy for the WARRP was not an *informed* one: on one hand the community was not adequately informed of the potential noise impacts, while on the other the lack of a strategy that would provide useful feedback to ASA meant that they were not informed and prepared for the community backlash that resulted.

Does Airservices Australia have adequate triggers for public consultation under legislation and are their procedures compliant with these requirements?

My brief review of the more relevant pieces of legislation on the ASA website does not provide a clear picture as to the legislative triggers that apply when ASA proposes a change in flight paths. The ASA website should be revised to outline the process for implementing such changes. The website should also make clear the respective roles of ASA and CASA in noise management.

My understanding is that when ASA proposes a change in flight paths, they would follow their *Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise* (Airservices Australia Environment Branch, revised 21 November 2002). This document outlines fundamental principles (e.g. noise-sharing); a hierarchical set of environmental standards; and a screening procedure to determine whether proposed new arrangements require detailed environmental assessment.

In essence, the screening procedure proposes that if a change in flight path causes a change in noise exposure of less than 3dB, then no further assessment is required, while a change of more than 3dB would necessitate a more formal environmental assessment. The document does not spell out what process should take place in either of these cases.

Assuming that this procedure is used by ASA as a relevant trigger for public consultation, then (as noted above) the assessment report should be made available on request regardless of whether it shows a 3dB increase or not, in order that the public may be able to assess for themselves whether or not a more formal assessment is needed.

I do not intend to provide a detailed assessment of the screening procedure here, however as it is based on a single-number noise index, it can be argued that it may not capture significant noise impacts in all situations. I would support a recommendation from the Senate Enquiry calling for a public review of the *Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise*.

It is clear in this case that the sheer scope of the WARRP – described by ASA as the most significant in Perth for 30 years – should have identified it as one triggering a public consultation strategy that included clear information and a comprehensive noise assessment report.

Is ASA accountable, as a government-owned corporation, for the conduct of its noise management strategy?

Without Committees such as PANMCC having access to clear and accurate information about proposed flight path changes, including noise assessment reports, it is not possible to verify ASA's noise assessments and to determine whether ASA has followed the principles in the document referred to above. ASA has therefore not been accountable under the procedure adopted for the WARPP.

Has ASA pursued and established equitable noise-sharing arrangements in meeting its responsibilities to provide air traffic services and to protect the environment from the effects associated with aircraft for which it is responsible?

It is not possible to assess or confirm this on the basis of the information available to date, as the noise assessment of the various options that have been considered has not been made available.

Does ASA require a binding Community Consultation Charter to assist it in consulting fully and openly with communities affected by aircraft noise?

I consider that some form of statutory requirement should be in place, as the current *Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise* is not an effective tool in the absence of such requirement.

Other related matters

Webtrak

I would commend ASA on the introduction of Webtrak, which enables a person to view details of aircraft movements on an interactive screen – as the community becomes more familiar with this tool, it will assist in understanding how aircraft noise is generated and managed.

ANEF Charts

Australian Noise Exposure Forecast (ANEF) charts are used by planning authorities to allocate land uses around airports. The process whereby ASA approves ANEF charts is not clear. It appears that ASA requires the airport to seek comment on the ANEF before ASA gives approval, however ASA does not seem to carry out any consultation of its own on the ANEF. This means that ASA is dependent on the extent to which the airport has consulted stakeholders and the community, and on the accuracy of the information provided by the airport.

A recent example was the Jandakot Airport Master Plan of 2009, where the future number of aircraft movements indicated in the draft Master Plan was significantly greater than the number given in the ASA-approved ANEF. This would mean that, if numbers of movements increase to the level in the Master Plan, the noise impacts may be greater than indicated in the ANEF chart.

A more open process for approval of ANEF charts is needed, involving stakeholders.

NFPMS reports

The Noise and Flight Path Monitoring Reports provided by ASA are helpful and full of relevant detail as to numbers of flights and noise levels, as measured at the permanent noise monitoring terminals. ASA has undertaken to conduct some noise monitoring with a temporary monitor at locations around Perth Airport, and it is hoped that the information from that monitor will similarly be publicly available.

Noise enquiry service

The ASA noise enquiry service provides a response to enquiries recorded on its complaints line. Anecdotal evidence from persons I have spoken to who have used the service is that, while ASA does respond to the complaints, there seems to be little or nothing that ASA can do to alleviate the noise issue.

The PANMCC has begun a review of the effectiveness of the noise enquiry service, in conjunction with ASA, however this has not progressed to date. I would support a recommendation from the Senate Enquiry that called for an independent review of the operation and effectiveness of the ASA noise enquiry service, to be based on interviews with callers to ascertain how this worked for them and how it could be improved.

Technical advice

ASA noise specialists have from time to time attended PANMCC meetings, and this has often been of benefit to members in understanding noise issues. ASA stopped sending specialists for a time prior to the WARRP, and this may have contributed to the lack of understanding of that proposal. While this type of advice service may be resource-intensive for ASA, it is considered important in the overall management of aircraft noise, and I would support its being formalized in some way.



John D Macpherson

29 January 2010

**WA Department of Environment and Conservation (DEC) Officers' Notes
with Comments by J Macpherson
on WARRP Briefings
at Perth Airport Noise Management Consultative Committee Meetings**

28 July 2006 (J Macpherson attended for DEC) –

Ken Hodge (ASA) attended PANMSC and advised Airservices Australia were looking at the route structures and this would affect SIDS and STARS. He would be coming to the next meeting, and information would be on the ASA website. Consultation would take place in the second half of 2006, then design/training/implementation in 2007. Committee commented we needed information to be available and submission dates. Ken Hodge noted that the changes would be further out than current changes.

Comment – This was very preliminary and gave the impression that the changes would not affect the nearest suburbs.

4 October 2006 (M Cake attended for DEC – his notes follow) –

Airservices – a review of airspace in WA – Western Australia Route Review Project (WARRP). Consultation is provided by website – updates emailed to stakeholders. Largely looking outside 100nm for significant changes, with minimum changes close to the airport. Stage 1 implementation – June 2007; Stage 2 remote destinations in WA. Instigated by CASA as a required Corrective Action for safety reasons. Noise concerns raised as a result of introduction of new airspace boundaries. South of Banjup in June 2005 have been addressed – Banjup/FRIARS. Major restriction is military airspace to the north of Perth.

No significant change to RWY 21 arrivals or departures within 11nm. RWY 03 arrivals – changes from over Banjup and significant change to northern approach. Looking to minimise crossovers of arrivals and departures. Overheads will be placed on the website – need to download. Two way route structure ('racetrack' approach).

Stage 2 will involve closer investigations of impacts around regional airports, although to a certain extent these will not be dramatically altered because arrival/departure orientations have been informed by existing runway alignments and weather conditions. South Perth commented that time of aircraft also needed to be considered (e.g. international flights). Other trends are more accurate tracking of routes using GPS for way points; 'free flight' for internationals above certain altitude (28,500). Qantas are allowed visual approach along river when suitable weather allows – to reduce 25nm – time-fuel saving (environmental benefits). (Some cultural change at Qantas – used to be where they could save a nm they would). Domestics would tend to use this visual approach (props). Departures use the South Perth route. Policy is for different arrival or departure routes to share the load.

Assessment of proposed change – assessment normally stays as an internal document. Would consider releasing environmental reports for public comment at request of PANMSC. Only if significant would it go to Minister for Environment. DEC should perhaps also request this information. Call for environmental reviews to be made publicly available – emissions plus noise – unclear whether that would be to

PANMSC only or to broader public, e.g. on website. Safety clearly has priority. Will compare impacts to existing routes. Perth Airport to prepare letter.

Comment – Perth Airport wrote to Airservices Australia on 15 November 2006 requesting the Environmental Assessment reports for the proposed flight tracks, however I understand the report was never released as there was no significant impact according to Airservices screening procedure. The PANMCC again requested this report in 2009, and it is understood that ASA are still considering the request.

Again the impression was given that the changes would occur well away from the airport.

21 February 2007 (J Macpherson attended for DEC) –

The status of the WARRP was raised in Other Business. Committee was advised that the project had been delayed from June to November due to air traffic issues and problems of access through Defence areas. Environmental assessment to start in April. The routes on the website were not likely to change, and most of the changes would be further out (50-60km) from the airport.

Comment – This was a brief update regarding the delay, again reinforcing the impression that the changes would occur well away from the airport.