

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

Submission Relating To Moorabbin Airport, Victoria, Aspendale Resident

### **Summary**

#### Absence of Noise Data Collection and Transparency

*AirServices Australia is not collecting or acting on aircraft noise data within the Moorabbin Control Zone which is one of the busiest aviation precincts in the country*

#### Managing Noise at the Source

*CASA will readily confirm that it has no involvement in aircraft noise as it relates to community amenity and yet it is involved with Air Navigation Regulations relating to noisy aircraft. Meanwhile AirServices Australia endorses long range noise forecasts prepared by the private business Moorabbin Airport Corporation (MAC) which impact on local Council planning and yet AirServices Australia admits that it has no idea where the MAC data comes from. It's a management shambles.*

#### Who Puts The Measurements Into Context & How?

*Aviation noise management requires context, using a similar approach to that applied by the Environmental Protection Authority (EPA). Currently there is no attempt to measure & manage aircraft noise by first considering the perspective and requirements of sensitive urban areas which are particularly affected by aviation activity. There is little consideration of human ecology and reduced quality of life in the Moorabbin aviation precinct and the associated coastal corridor, but in other places there are plane and helicopter procedures relating to noise abatement for breeding sea birds, whales and national parks.*

#### Measurements Alone Don't Solve The Problems

*Even if AirServices had the right data it doesn't appear to know what to do with it.*

#### Irrational Aviation Procedures Underpin Much Of The Noise Issue

*In many cases a simple rethink of common procedures would greatly reduce noise pollution from aviation. Circuit and entry altitudes within the Moorabbin Control Zone, particularly for helicopters are a case in point.*

#### The Problem Is Much Bigger Than Any One Department

*There are conflicting interests and fragmented poorly communicating departments within Aviation and AirServices is just one of the many stake holders. The AirServices Webtrak system is nothing more than an expensive and fairly meaningless PR exercise and doesn't provide the community with proper information about aircraft activity or identification..*

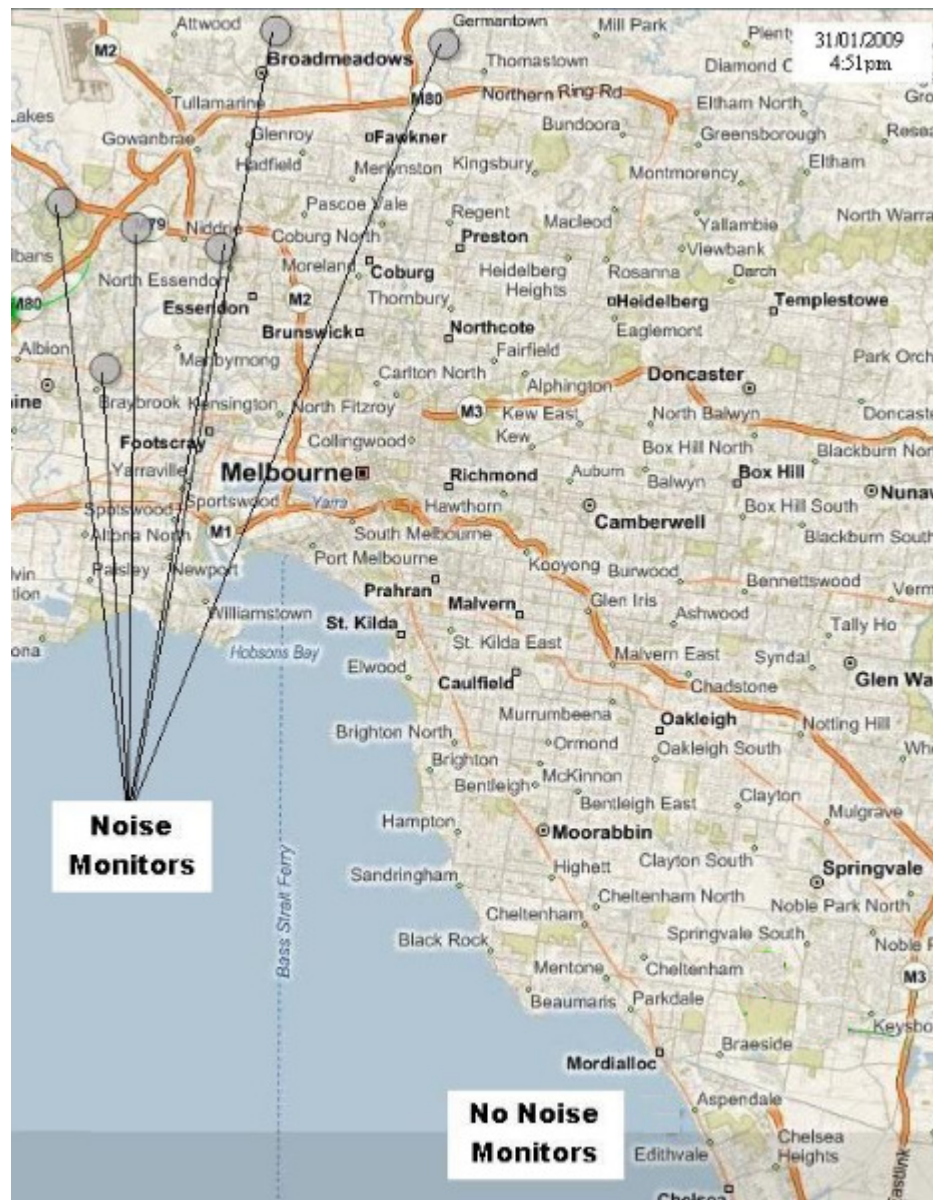
#### There Are Solutions, but Who Is Listening?

*Is there really a desire to see effectiveness in the management of aircraft noise and if so why is the enquiry limited to AirServices Australia? It appears that no department has the authority or enthusiasm to become involved with even the most obvious issues and solutions.*

## Submission Relating To Moorabbin Airport, Victoria

### 1) Absence of Data Collection and Transparency

Perhaps the most glaring issue with regard to noise pollution and aviation at and around the Moorabbin Airport is the lack of proper data collection. The Moorabbin Airport is one of the busiest and noisiest regional airports in the Southern Hemisphere. In the following chart, which contains information provided by AirServices Australia, it can be seen that there are at least 6 aircraft noise measuring devices in greater Melbourne but none of them are anywhere near Moorabbin Airport.



## 2) Managing Noise at the Source

Aircraft operating in Australia must meet noise standards specified in the Air Navigation Regulations (1984). This is an area almost exclusively handled by CASA rather than AirServices Australia. CASA suggests that noise standard dispensations may be granted and can include conditions that are intended to mitigate the impact of aircraft noise on the community. In practice and except for extremes of noisy aircraft CASA has little practical regard for the impact of noisy aircraft on the community, a position which it makes quite public. Moreover there is no objective way for the regulations to be applied with proper consideration of the impact of aircraft noise on specific communities. Furthermore CASA does not appear to understand a number of the issues to do with noise and airport planning such as ANEFs (noise exposure forecasts) and generally how and where the public are being affected by aircraft noise and from which aircraft. Clearly one body needs to be collecting the noise data and also administering the noise regulations and there needs to be more consideration of community amenity.

There are also significant problems with the way noise forecasts are assembled. It seems this might have been picked up in the recent Aviation White Paper but it should be captured here. Since the Moorabbin Airport acquired its lease on the site it has been given discretion over the compilation of noise exposure forecasts and these form a significant part of the Airport Master Plan. To date none of these forecasts has been objectively challenged for accuracy or relevance even though AirServices endorses them. The forecasts have been feeding into local Council planning overlays and compromising the property rights and enjoyment of certain property owners. It should be remembered that the Moorabbin Airport lease is controlled by a private business with shareholders and a profit motive. The writer has correspondence from AirServices Australia which confirms that it has no knowledge of where the Moorabbin Airport Corporation has been sourcing the data which it uses to compile the Master Plan noise exposure forecasts!

To further confound matters there does not appear to be an active process of auditing the noise compliance data for the aircraft which operate out of Moorabbin and this data doesn't appear to be publically available? The public endure a number of inappropriately loud aircraft but there is little opportunity to document these experiences except to make vague references to times and locations. The reason for this is that ground identification of aircraft is quite difficult, made harder by the fact that most aircraft do not use transponders in the Moorabbin Control Zone and in any case AirServices Australia will not publically identify an aircraft.

## 3) Who Puts The Measurements Into Context & How?

Aircraft noise is a function of altitude and the sensitivity of the area over which the aircraft is flying, it cannot be an isolated and prescriptive parameter simply based on aircraft type or compliance specifications. By way of comparison, the EPA uses noise level guidelines which are influenced by how and where noise is occurring. Unlike the aviation industry the EPA does not simply reference tables of average noise emissions and assume that these averages will result in societal or environmental appropriateness for a given business or activity.

It is not necessary to ban all but the newest and environmentally conservative aircraft. There are many alternatives available for recreational and discretionary flights by such noisy aircraft. Aside from better route and or altitude planning these

aircraft could operate out of less populated and less sensitive airports like Mangalore, Tooradin, Leongatha, Coldstream, Tyabb and so forth. This would also dilute the impact at any one centre.

There is little consideration of human ecology and reduced quality of life in a the Moorabbin aviation precinct and the associated coastal corridor, but in other places there are plane and helicopter procedures relating to noise abatement for breeding sea birds, whales and national parks. A society should not have to tolerate the continued activity of an aircraft if it is clearly a source of significant noise pollution any more than it should have to tolerate other forms of inappropriate industrial noise or annoyance. Moreover if a community genuinely seeks environmental progress then it should not protect or hide potential sources of environmental imposition as seems to be happening (by omission or otherwise) within the aviation industry.

## 2) Measurements Alone Don't Solve The Problems

Even if noise data were readily available for the Moorabbin Airport there does not appear to be a proper understanding of what might be acceptable standards for the local community and what it would take to achieve such standards? When it comes to the impact of aviation on community health, quality of life and amenity the closest any of the aviation papers comes to addressing community issues is to recommend community consultation, but there is never a requirement for outputs or a direction for such consultation. The existence of the so called consultative process falsely mollifies the community and gives the various aviation stakeholders a convenient scapegoat. The well known Moorabbin Airport Consultative Committee of which AirServices Australia is a member is a classic example of an aviation "pressure valve" which has achieved very little in the dozen years that it has been in operation. The blight on the community of the local aviation industry was documented in Hansard ten years ago; today the issues are worse and there is talk about even more imposition. [http://parlinfo.aph.gov.au/parlInfo/genpdf/chamber/hansardr/1999-03-23/0094/hansard\\_frag.pdf;fileType%3Dapplication%2Fpdf](http://parlinfo.aph.gov.au/parlInfo/genpdf/chamber/hansardr/1999-03-23/0094/hansard_frag.pdf;fileType%3Dapplication%2Fpdf)

In the current aviation climate additional availability of and or responsibility for noise data would probably continue to fuel a culture which is almost completely devoid of social responsibility. It would to be used to:

- 1) Expand activity to the edges of allowable limits
- 2) Revise standards of planning to support further aviation interests and codify the reduced public amenity and enjoyment of property rights
- 3) Provide better insights into how to disperse and or be accountable for the data thereby maintaining the all care but no action or responsibility maze which currently exists.

## 3) Irrational Aviation Procedures Underpin Much Of The Noise Issue

At lower altitudes aircraft impose more noise on the community, so it is astonishing that the circuit and entry altitude at Moorabbin are only 1000 feet. For a theoretical continuous descent, the average altitude of planes in this busiest of control zones over a fairly densely populated community, would be in the order of 500 feet. From a noise abatement perspective an entry and circuit altitude of at least 1500 feet

perhaps even higher would make more sense. Also it would seem logical to create aircraft separation by requiring that noisier aircraft like jets and helicopters to fly at higher altitudes. It is shocking that helicopters have a circuit and entry altitude of only 700 feet. A far more rational altitude would be 1200, 1500 feet or more. Helicopters have become a particular problem because 700 feet is so low that ridiculously compromised altitudes become justifiable during approach or departure from Moorabbin Airport. These helicopters frequently ply the beach over the sand or just offshore flying at altitudes of around 500 feet having just flown five kilometres over homes before even reaching this token altitude. In effect the average altitude over populated areas within the control zone for noisy helicopters can be only a few hundred feet! To make matters worse there are no helicopter fly neighbourly requirements in the Moorabbin Control Zone. These loud aircraft can ply highly valued scenic routes hour after hour, day after day without cause to minimise impact by altering their routes or altitudes. They can also fly their sightseeing customers slowly overhead or hover over homes and public areas. Should AirServices Australia be a one stop shop for all of the issues raised above? After more than a year the writer is still trying to piece together all of the stakeholders who have affected the current procedures for the Moorabbin Control Zone.

#### 4) The Problem Is Much Bigger Than Any One Department

In all things aviation there is limited pilot accountability because aircraft identification is difficult and securing a complaint (noise or otherwise) which might be taken seriously is almost impossible. Firstly there are the endless “airmanship” caveats in aviation regulations which provide a defence for all but the most negligent and obvious breaches. Then there is the obvious reluctance of departments like CASA or AirServices Australia to be judge, jury or executioner. There is an unusually strong aviation lobby which continually secures self interest above the rights of whole communities and seems divorced from modern notions of social responsibility. It’s clear that aviators essentially regulate themselves through groups like RAPAC. RAPACs are private users groups which exert unhealthy control over both CASA and AirServices Australia agendas on most things tactical (this includes issues of noise and selection and design of flight paths, altitudes and so forth). Moreover the needs and rights of the community do not feature in any real way on the RAPAC agendas. Finally there are layers of propagated misinformation which are so pervasive that they even exist in policy documents like the recent Aviation White Paper. For example the White Paper suggests that the AirServices Australia much heralded Webtrak project provides the public with insights into aircraft activities. Of course this is not the case because the system relies on the use of transponder signals and at least in the Moorabbin Control Zone only a minority of aircraft use their transponders so the data and the Webtrak site are virtually worthless.

#### 5) There Are Solutions, but Who Is Listening?

1) Planes are very mobile and Moorabbin Airport is not the only facility in the area suited to training and or recreational flying. As such it would seem reasonable to set sensitive environmental noise standards for all planes which chose to use Moorabbin Airport. Without such reasonable standards there is no incentive for aircraft operators to pursue environmental advances. Who is going to initiate something like this - AirServices Australia, CASA, RAPAC, MAC, the Minister or some other group?

2) It would seem appropriate to direct aircraft over less populated areas when they are flying at lower altitudes. The first picture below is an AirServices Australia chart of aircraft activity in the Moorabbin control zone for just one day; each red line is an

aircraft movement. Note that because 75% of aircraft do not use their transponders and are not shown in this chart the density of activity is actually profoundly greater. It can be seen that there is a high concentration of aircraft activity along the coast in what is also known as the Carrum approach route. The urban and community importance of this coastal corridor is so well recognised that a comprehensive foreshore plan was released by the City of Kingston in September 2009. In other words this coastal corridor is intended to be of high amenity and recreational value and comprises a relatively densely populated part of the City. In several locations this coastal corridor coincides with Parks Victoria marine zones. In all ways this corridor is a sensitive area and yet clearly it is being undermined by aviation activity and noise. Should AirServices Australia be aware of the foreshore plan and should it be looking at ways to reduce the current aviation impact on the area?

The second picture is a satellite image of the Moorabbin control zone. In the satellite picture the broad semi-rural and industrial area (shown with orange hatching) is clearly visible. This hatched area is an obvious corridor for aircraft activity but it can be seen that the aircraft prefer and are directed to the scenic coastal route. This hardly seems appropriate and is made even more disturbing by the availability, size and unpopulated nature of adjacent Port Phillip Bay. It seems to be forgotten that planes are highly manoeuvrable while people's homes are not.

After numerous approaches to CASA and AirServices Australia about issues of aviation noise and safety the writer has been repeatedly referred to the Moorabbin Airport Consultative Committee and the local RAPAC – both are private and self interested aviation assemblies with a vested interest in the status quo and no particular desire to acquire additional environmental burdens and it seems no particular interest in reducing aviation noise or improving community amenity.

