

SACF Submission to the Senate Standing Committee on Rural and Regional Affairs and Transport's Inquiry into the Effectiveness of Airservices Australia's Management of Aircraft Noise

1. INTRODUCTION - SYDNEY AIRPORT COMMUNITY FORUM (SACF)

Many Sydney residents have to deal with aircraft noise because Australia's busiest airport is only 8.2km south of the CBD. Expansion of the airport with a third runway, which opened on 1 November 1994, rather than construction of a new airport, compounded this problem significantly by changing the way the airport operated. The response to the community outrage that occurred was the establishment of the Sydney Airport Community Forum (SACF) and development of a Long Term Operating Plan (LTOP) for Sydney Airport to minimise and more fairly share aircraft noise.

The Sydney Airport Community Forum (SACF) has been established by the Minister to be the Forum for community engagement and advice to the Minister on aircraft noise issues relating to Sydney Airport. The Sydney Airport Lessee Company is a member and Airservices Australia is an observer. SACF is significantly different, in many respects, from every other Australian airport consultative committee.

The Long Term Operating Plan (LTOP) prescribes different combinations of runways to use (referred to as "modes") to minimise and more fairly share aircraft noise, and targets for the proportion of aircraft movements over different parts of the city to ensure that noise sharing is being achieved. A copy of LTOP is available on the Airservices web-site.

As a component of LTOP a related technical committee, the Implementation and Monitoring Committee (IMC) was established by Ministerial Direction. IMC is charged with monitoring and reporting noise sharing under LTOP and with recommending ways in which noise minimisation and sharing can be improved. This committee is chaired by Airservices Australia. Two community representatives, who are also members of SACF, sit on IMC.

While problems of aircraft noise are not unique to Sydney, aircraft noise in Sydney affects a larger population to a greater extent than any other Australian airport. Airservices Australia has the prime role in the management of aircraft noise in Sydney. SACF submits that while there are several areas where Airservices is meeting its obligations commendably, they are falling short in key areas.

2. AIRSERVICES AUSTRALIA'S ROLE IN MANAGING AIRCRAFT NOISE

SACF respects and wholly supports Airservices' responsibility of ensuring the safety of planes and their passengers. Importantly, Airservices also has responsibility under the Air Services Act to protect the environment from the effects of aviation, the principle one of which is, by far, aircraft noise. SACF's concern is that actions to minimise the effects of aircraft noise are not high enough a priority for Airservices, and appears to sometimes be a lower priority than the operational efficiency of airlines.

Airservices role in managing aircraft noise in Sydney is put into effect by its responsibility to implement LTOP, which is the practical embodiment of the policy to balance operational efficiency with environmental and community sustainability. Airservices was directed on 30 July 1997 by the then Minister for Transport to implement LTOP and has an on-going obligation for its achievement.

Although Airservices is subject to the Environment Protection and Biodiversity Conservation Act, it has only ever referred two matters under s 160 and these were both heritage and not noise related. The Agency undertakes its own Environmental Assessments and these are not public documents readily available on its web site, as they should be.

Australian Noise Exposure Forecasts (ANEF) are a primary land use planning tool which Local Councils are required by NSW State law to incorporate into their Local Environmental Plans. The preparation of an ANEF is the responsibility of the Airport Lessee Company but endorsement by Airservices is required. ANEF's are an important part of the Master Planning process for airports, and draft or endorsed ANEF's must be part of the preliminary draft Master Plan circulated for 60 days for public comment.

3. AIRSERVICES AUSTRALIA'S PERFORMANCE IN MANAGING AIRCRAFT NOISE

LTOP Targets

Airservices has responsibility for implementing the Government's noise sharing regime under LTOP. The failure to reach the LTOP noise sharing targets is a longstanding and continuing matter of concern to the Forum. Table 1 shows the extent to which the LTOP targets have not been met over the ten year period 1998 to 2007 (this period has been chosen to avoid any distortions resulting from the Runway End Safety Area (RESA) project).

Direction	LTOP Targets	Ten Year Average 1998-2007
North	17%	27.5%
South	55%	50.6%
East	13%	13.3%
West	15%	8.7%

Table 1: LTOP Noise Sharing Performance 1998-2007

Successful achievement of these targets correlates highly with successful management of aircraft noise in Sydney. SACF is of the view that Airservices is required to achieve the targets and has failed to do so. Further, Airservices is required to implement all the elements of LTOP listed in the Ministerial Directive dated 30 July 1997.

SACF believes Airservices should be more transparent and responsive in providing reasons for the non-attainment of the noise sharing targets and for the selection of the runway mode in use at any given time. Community trust in Airservices' commitment to fully implementing LTOP would be considerably enhanced if residents were provided access to real-time information on the reasons behind runway use decisions made by Air Traffic Control.

Simultaneous Opposite Direction Parallel Runway Operations - SODPROPS

SODPROPS is a mode of operations which directs all departures to the south over water and turning through the Botany Bay Heads (with La Perouse to the north and Kurnell to the south). Arrivals track from the south over the Kurnell sand hills and land to the north on the main runway. Some sideline noise is still experienced but this mode has far less impact than any other and is preferred during all non curfew hours. Long haul departures may still need to operate to the north but these are not scheduled in the early morning. Availability of SODPROPS is constrained by both capacity and weather.

During RESA works, which severely limited use of the East-West Runway, SODPROPS was just about the only mode which avoided both arrivals and departures over residents to the immediate north of the airport. Over the period of the RESA works, Airservices performed remarkably well in achieving unprecedented levels of utilisation, measured as a percentage of non-curfew hours:

- In the four months June to September 2009 the level exceeded 11%;
- In the twelve months following start of works, the level in every month, except November, was higher than had ever been previously recorded.

SACF's concerns are:

- In the ten years prior to RESA the average utilisation was only 1.8%;
- In the last three months of 2009, utilisation dropped to only 1.12%, 1.79% and 0.77%;
- SACF does not accept that these differences are entirely due to weather;
- Airservices does not record and make available all of the data which would permit an analysis of the basis on which mode selection decisions were made.

SACF is of the view that all efforts need to be made to maximise aircraft movements over water. Figure 1 shows 70dB(A) noise footprints for a B747-400 departing to the north over the suburbs and departing to the south over Botany Bay and the Kurnell Sandhills. It is estimated that about 100,000 people are exposed to a noise event louder than 70dB(A) for the northerly take-off compared to less than 5,000 people for the southerly take-off.

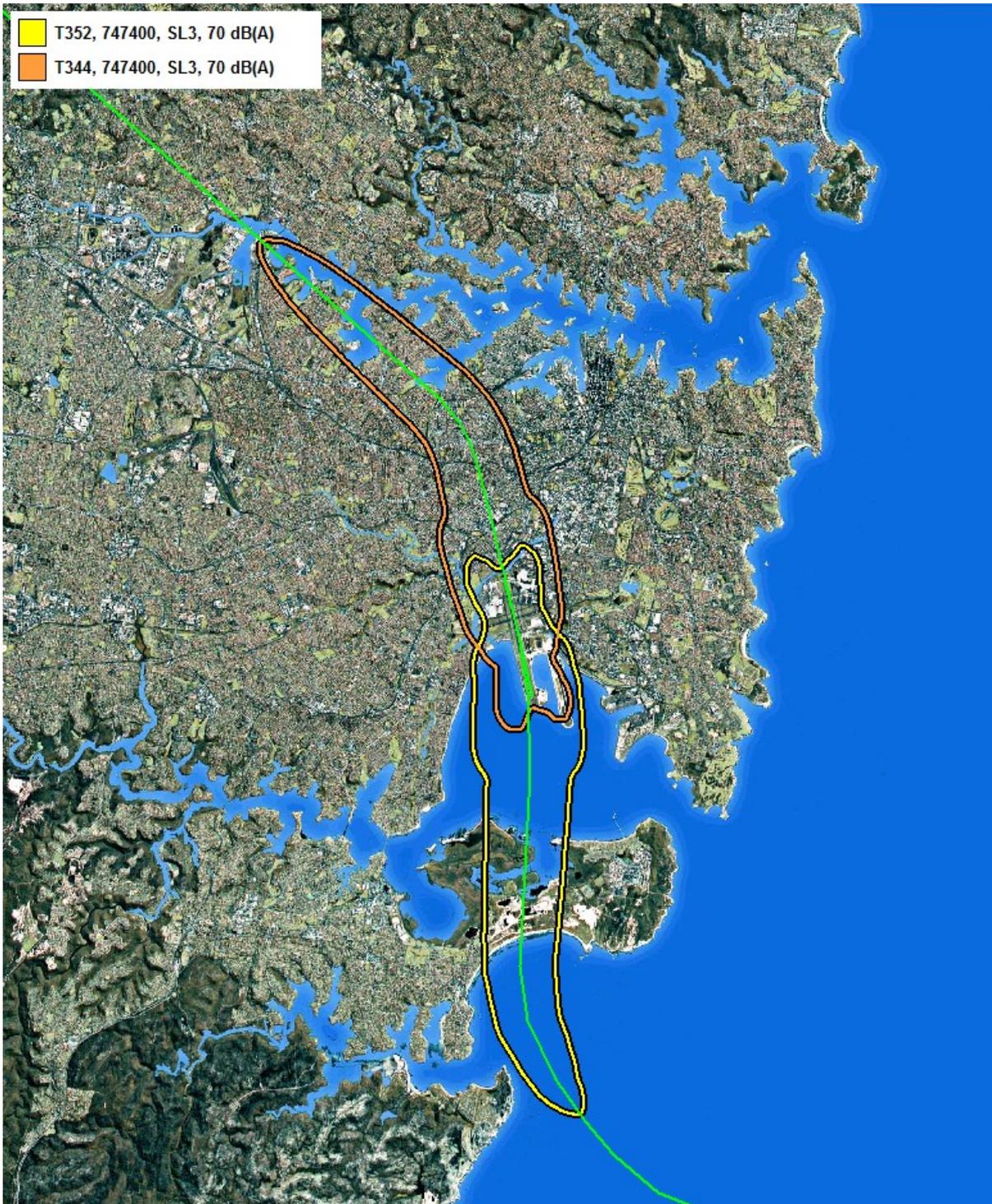


Figure 1: 70dB(A) Noise Footprints for B747-400 departures from Sydney Airport

Runway End Safety Area (RESA) Works

In addition to the dramatically increased use of SODPROPS, to its credit, Airservices also resurrected LTOP Mode 15 to provide some respite to the north during the period of the RESA, and undertook an environmental assessment of this measure only. However, monitoring of SODPROPS and Mode 15 utilisation, along with the distribution of aircraft between northerly takeoffs and landings, and recommended adjustments to more equally share aircraft over the north

was left to SACF. The opportunity to more actively engage on issues such as avoiding patterns of exposure e.g. one area consistently at night and another in the morning, and exposure of the same population for days in succession e.g. arrivals from the north commencing at 6am for 14 days in succession in February 2009, appears to have been missed.

Runway 34L RNAV Standard Terminal Arrival Route (STAR)

Minimising the concentration of aircraft overflights is one of the most fundamental and critical elements of LTOP. This was the principal concern expressed by SACF at the time the 34 STARS proposal was submitted by Airservices in March 2004. Approval was only given due to the assurances provided by Airservices in their Environmental Assessment that unacceptable concentration over residential areas would not occur in the future. The concentration on this flight path that has started to occur recently has only come to light as a result of complaints by constituents of the Federal Electorates of Lowe and Cook.

Six months ago, when this issue made the front page of the Sydney Morning Herald, IMC was promised a comprehensive report before its next meeting. However, this report is still outstanding and pertinent questions about the accuracy and conformity with which the 34L STAR is being flown now and in the future, how this differs from what was flown previously and what was predicted in the environmental assessment remain unanswered. Importantly, neither has Airservices come up with any alternatives or proposals to mitigate the impacts of this procedure.

An important additional lesson learnt from the issue of the 34 STARS is that the Airservices publication “Environmental Principles and Procedures for Minimising the Impact of Aircraft Noise” needs to be reviewed in the light of this experience and what were previously regarded by Airservices as acceptable or insignificant levels of noise exposure must all be reconsidered and justified.

4. ACCESS TO INFORMATION

The community is dependent on Airservices generating and making publicly available all information about the extent to which the noise is being shared. It is dependent on Airservices providing advice about any changes in the use of flight paths and about proposals for the introduction of new operational procedures.

In many areas Airservices provides an excellent, but not necessarily universally endorsed, service. The Noise Enquiry Unit (NEU) operated by Airservices is the interface between Airservices and the general public and is available to respond to queries and record complaints during normal office hours. It provides the public with information on flight paths and, for example, the reasons for the current runways being used. The NEU generates monthly reports on the operations at the airport. These reports provide a useful picture of how noise is being distributed between communities around the airport. However, Airservices has been reluctant to record and provide the source data on airport operations to allow its decisions to be better understood and verified.

A further problem has been concerns about the NEU’ inability to explain information as opposed to simply provide it. Particularly given the complex technical nature of the issue of aircraft operations there is a need for improved education for community representatives (eg. local MP’s and their electorate staff) so they can access information, analyse and explain it, as well as work with authorities to help bring about resolutions of issues.

In recent times the introduction of the public access, near real time, noise and flight path information system - WebTrak – has made a very positive contribution to the general community’s understanding of operations at Sydney Airport. However the focus remains on the provision of information and not on the need for and instigation of change that will minimise and more equitably distribute aircraft noise.

5. OMBUDSMAN

The Forum views the Government’s commitment in its aviation white paper to establish an aircraft noise ombudsman as a very positive initiative. This has the potential to address many of the problems that are now appearing in the way Airservices manages aircraft noise. The Forum looks forward to engaging with the Ombudsman when appointed – SACF members have a wealth of knowledge which would assist the Ombudsman understand community concerns and expectations. While the establishment of the position is strongly supported, members have concerns that this position is being set up within Airservices. On the positive side, this will ensure that the position is funded by the industry –

SACF supports the polluter pays principle. However, as the position is within Airservices there will inevitably be a perception of a lack of independence. It is fundamental that the position receives adequate resourcing and that the Ombudsman is given adequate powers.

6. COMMUNITY ENGAGEMENT

SACF is of the view that Airservices should be looking toward consultation concepts based on engagement – that is communities and aviation authorities working together to find solutions. This is consistent with the National Aviation Policy White Paper which makes numerous references to “community engagement”.

A major report funded by the US Federal Aviation Administration (FAA), released in Jan 2010, when discussing airport/community relationships states *‘The culture must shift from an attitude of focus on information (one-way communication) to focus on an engagement relationship (two-way communication). **Until this problem is solved, further techniques and strategies are likely to fail.***¹

Airservices should develop and publish a Community Engagement Protocol which should describe in detail how “community engagement” will be delivered.

Development and finalisation of the Protocol should itself be subject to consultation and agreement and should, as a minimum, involve community representatives on the airport consultative committees of Australia’s eight International Gateway Airports.

It is important also to recognise that while discussions on flight paths and associated aircraft noise usually takes place within airport community forums such as SACF it is essential to also engage directly with all impacted communities and residents who may not be represented on these forums.

The Minister’s Charter to Airservices Australia should make it clear what is required by the Government with regards to community engagement.

7. CONCLUSION

While SACF sees a number of positives in Airservices Australia’s management of aircraft noise, there remain significant issues with its management in Sydney.

Given the long history of the community’s interaction with Airservices on aircraft noise in Sydney, and a desire to keep this submission concise, a delegation from SACF, comprising the SACF Chair and the two community representatives on the IMC, would be willing to appear before the Committee to expand on the matters raised.

¹ http://onlinepubs.trb.org/onlinepubs/acrp/acrp_rpt_015.pdf page 4, Para 5