



Investigation into Complaints about the
Perth Noise Improvement Proposals
November 2015

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1 Executive Summary

- 1.1 During the course of 2015 Airservices Australia (Airservices) proposed three significant changes to the management of air traffic to and from Perth Airport. The aim was to deliver improvements in the management of aircraft noise over residential areas. Two of these changes have been implemented. The third proposal will not proceed.
- 1.2 The Aircraft Noise Ombudsman (ANO) congratulates Airservices on the effort to improve the aircraft noise outcomes for Perth. Nothing in this report should be taken to be in any way critical of this effort. On the other hand, in response to the complaints received by this office and our own independent evaluation of Airservices' management of these noise improvement proposals, we have identified a number of significant concerns that led to our decision to conduct a formal review.
- 1.3 A number of aspects of the development of the proposals, their presentation to the public and the analysis of the possible benefits and impacts provide scope for improvement. Airservices has already identified a number of lessons for the future. This report adds 24 recommendations for further opportunities to improve both the management of the current Perth initiatives and the development, analysis and management of future noise improvement opportunities (see **Attachment 1**).
- 1.4 The concept for the changes was sufficiently sound to justify serious investigation of the proposals. The potential for significant gains in reducing aircraft noise over Perth warranted effort being put into the initiatives. Unfortunately, announcement of the proposals prior to completion of detailed analysis meant that there were mixed understandings in the community about the purpose of consultation and the likelihood of the changes proceeding. This resulted in unnecessary concern among residents in Canning Vale and surrounds about a significant potential increase in aircraft noise. It also resulted in many residents along the Swan River corridor developing an unrealistic expectation that all the changes would proceed, resulting in undue disappointment when this did not occur. Residents in other areas across Perth felt that they were not being fairly considered or consulted.
- 1.5 Most significantly, the changes that have been implemented occurred prior to the public availability of the detailed assessments or any other information that clearly made the case that the changes will deliver a noise improvement. Even now, the ANO remains unconvinced and disappointed at Airservices' lack of response to requests for clear information to support their decisions to introduce these changes.
- 1.6 The ANO is aware that Airservices intends to conduct post-implementation reviews twelve months after implementation of the changes. The ANO will be closely monitoring these reviews to ensure that they provide a genuine evaluation of the impacts and benefits. The ANO would expect Airservices to implement in a timely fashion any further changes identified in the post-implementation reviews as necessary to ensure the best noise outcomes for Perth are achieved.

1.7 This report makes 25 recommendations aimed at helping Airservices' review of the two initiatives already implemented and to improve Airservices' development, analysis and management of future noise improvement proposals. In summary, the recommendations identify:

- a need for more explicit information about the status of proposals for change when presented to the public
- a need for adequate consultation, based on timely, complete and comprehensible information being available to the public, prior to the introduction of changes
- room for assessments of the impacts of change to better reflect the issues that will most affect the public's response to possible changes
- a need for improved responsiveness by Airservices to ANO requests for information
- an improved approach for published material to address directly the concerns of those who will be affected by changes, both those who might benefit and those who might be disadvantaged.



Ron Brent
Aircraft Noise Ombudsman
26 November 2015

2 Introduction

Context

- 2.1 At the Perth Airport Consultative Forum (PACF) meeting of 5 March 2015 Airservices announced that it was considering changes to air traffic arrangements designed to reduce the aircraft noise impacts over Perth. Three proposals were presented as follows (named in this report as per the Airservices' Information booklet published at the time):
- Preferred runways: This change varied the noise abatement runway preferences to give equal priority to departures heading north, north-east and south (where previously departures to the south had been first priority ahead of departures to the north and north-east, which were equal second priority). The intention was to reduce the number of departures turning over the Swan River from the southern take-offs. The expectation was that, for the suburbs to the north, it would mean that arrivals would be replaced with departures with only a slight increase in noise.
 - Introduce Smart Tracking: A new arrival route for aircraft landing from the south-east was designed to use satellite based technology. This would allow aircraft equipped with the new technology to be able to arrive on a route that would fly over fewer houses compared to the existing instrument approach. The change also included varying the visual approach route to align with the new smart tracking route and to avoid overflying some residential areas in the Perth Hills.
 - Night-time respite (12-month trial): This proposal was to trial a change for aircraft departing to the south at night (defined as being 10pm to 5am). The idea was that aircraft departing to the south that currently turn west along the Swan River corridor would instead continue south (before turning west). The expectation was that aircraft would gain sufficient altitude by the time they overflew residential areas to be quieter than they would be over the suburbs along the Swan River corridor. The additional departure traffic over the southern suburbs might be offset to some degree by the new smart tracking route relocating arrivals from the east so that they would miss some of the suburbs to the south of the airport.
- 2.2 Airservices' intention was that, as a package, the three changes would result in a better noise outcome for the greater Perth area.
- 2.3 Unfortunately the detailed assessment of the night-time respite trial showed that aircraft would not gain sufficient altitude over the new areas to lessen the noise impacts significantly. Airservices identified that the impact of this change would be "there would be more people impacted by aircraft noise than under current procedures. There would also be a major increase in noise levels for some areas that currently receive only a small number of overflights at night". Accordingly, Airservices took the decision not to proceed with the proposed trial. The remaining two proposals have been implemented.

2.4 This report responds to numerous complaints from the residents around Perth who were concerned that they might be disadvantaged by the proposed changes. It also responds to complaints from the residents along the Swan River corridor who were disappointed to find that the hoped for respite from night time noise would not eventuate given Airservices' decision not to proceed with the night-time respite trial. Finally, it addresses concerns raised by residents about a lack of consultation and the uncertainty of potential impacts from the preferred runways change and introduction of smart tracking.

Objective

2.5 The objective of this review is to identify lessons learnt through Airservices' recent efforts to consider three noise improvements initiatives in Perth, in order to improve the management of future noise improvement opportunities and to ensure that the two changes that have been introduced are appropriately evaluated.

Methodology

2.6 The ANO decided to conduct a formal review of Airservices' Perth Noise Improvement Initiatives in response to the significant level of community concern expressed about the proposed changes and how Airservices had pursued them. These concerns were expressed in the form of complaints as well as in person at consultation sessions attended by the ANO.

2.7 The ANO reviewed all of the material available to the community since the public announcement of the proposals in March 2015. Additionally, the ANO requested specific information and answers to questions arising from complaints or from review of the material from Airservices. The ANO attended meetings, community information consultation sessions, routinely checked the Airservices website and sought additional information as appropriate to enable an independent assessment of how Airservices had pursued the changes.

Report purpose and structure

2.8 This report outlines the findings of the ANO's review and makes 24 recommendations to improve Airservices' consideration, introduction and review of potential noise improvement initiatives. The initial sections focus on:

- why Airservices was seeking to introduce changes to address noise issues in Perth
- how Airservices pursued its proposals
- issues arising from complaints to the ANO
- The report then considers Airservices' management of each of the three Perth initiatives announced by Airservices in March 2015, namely Preferred runways, Introduce Smart Tracking and Night-time respite (12 month trial)

2.9 The report closes with a discussion about next steps and a conclusion. A summary of the recommendations is available at **Attachment 1**.

3 Why was Airservices looking to make changes?

- 3.1 Perth Airport has been the subject of high levels of complaint and concern about aircraft noise since the ANO office began operations in September 2010. The situation in Perth has been worse than most other major cities in Australia for a number of reasons:
- There has been rapid growth in the amount of air traffic to and from Perth Airport over the last decade. This has in large part been driven by the rapid growth of ‘fly-in/fly-out’ operations to deliver workers to remote mines.
 - The rapid growth in air traffic over Perth required a major redesign of air routes over Perth. This redesign was implemented in 2008 and it changed the patterns of aircraft noise over Perth. This included putting aircraft noise over some areas that had not previously experienced significant aircraft noise.
 - The evolution of aircraft flight management technology has resulted in a narrowing in the spread of aircraft along some routes (depending on how particular routes are managed). This greater concentration of aircraft along the centre of the flight corridor has occurred to varying degrees on all departure paths from Perth Airport over time.
 - Most of the major airports in Australia have one end of their major runway(s) pointing to the ocean or to rural land, resulting in significantly fewer people being affected by aircraft noise when that end of the runway is used for arrivals and/or departures. Perth does not have this natural advantage in the siting of its airport. An increase in air traffic necessarily results in additional noise over residential areas.
 - Perth airspace is constrained by the proximity of the Pearce RAAF base to the north, the reservation of substantial airspace for military purposes, and by Jandakot Airport to the south.
- 3.2 In this context Perth has been disproportionately highly represented in aircraft noise complaint numbers over many years. Airservices has responded to this situation by putting substantial effort into finding ways to improve aircraft noise outcomes in Perth. Since 2010 Airservices has investigated 31 noise improvement proposals related to Perth and Jandakot Airports (including the three considered this year). Ten changes have been implemented.
- 3.3 Airservices deserves to be congratulated on the efforts it has made over recent years to improve the management of aircraft noise complaints. In particular this should include acknowledgement of Airservices’ efforts to identify and pursue potential noise improvement opportunities.

- 3.4 It is worth noting that, despite the pressure from community campaigns in some parts of Perth, Airservices has pointed out that the proposals would have been considered and pursued even without that pressure, as they were refinements of proposals already on Airservices' Strategic Noise Improvement Plan for Perth. Unfortunately, despite Airservices' best intentions, the development, analysis and management of the three proposals for Perth could have been more effective and there are many lessons to be learned from this year's efforts. This should not, however, detract from the need for Airservices to continue to fulfil its obligations to seek and pursue noise improvements where practicable.

4 Airservices' Processes for Pursuing the Proposals

Announcement

- 4.1 Airservices developed the three proposals and presented them to the community as a package. This allowed the changes to be considered as a whole so that the benefits of one proposal in a particular community could be considered against the disadvantages of another of the proposals in that community. The concept behind this approach is sound as it allows change to deliver the best overall outcome even though each individual component may have winners and losers.
- 4.2 Airservices announced the three proposals at the Perth Airport Community Forum (PACF) in March 2015, following a commitment given at the previous meeting to return to the forum with a plan for the changes that would occur in 2015. Airservices announced the proposals prior to completion of detailed analysis of the three changes. It presented a preliminary view of the potential noise impacts and benefits, which suggested there was a reasonable prospect that the changes could lead to improvements in noise outcomes. Unfortunately the caveat that there was still more work to be done to validate these untested views was not made clear by Airservices so most of the community expected all three proposals to proceed.
- 4.3 The early announcement created the opportunity to implement a consultation program at an early stage in the development of the proposals. Airservices foreshadowed that this “would be the start of a very hard community-wide conversation about the best noise management outcome for the city.” This is good practice and the ANO commends Airservices accordingly. The approach allows communities to have an input into the development of the proposals rather than be limited to comment on proposals that are too far developed to respond and adapt to consultation. However, this approach does require an iterative consultation strategy so that, as the detailed assessments are finalised and responses to feedback developed, the proposals can be refined and these can be further consulted with the affected communities.

Consultation

- 4.4 Consultation with communities commenced the day after the PACF meeting with two time periods announced for the following day when Airservices' staff would be available at the venue “on an informal drop-in basis”. These sessions allowed for residents to come by and talk more about the proposals. Airservices' information booklet also advised that “Airservices will be holding community information sessions around Perth on an informal drop-in basis. Session times, locations and detailed information including fact sheets and animations will be progressively available at [Airservices' website]”.
- 4.5 The next tranche of community information sessions was held in May 2015 in the suburbs of Guildford, Gosnells and Maddington. A third tranche of sessions, to be held in the suburb of Canning Vale in August was announced soon after the May consultations had concluded. However, these August sessions were cancelled when the decision not to proceed with the night-time respite trial was made by Airservices.

- 4.6 The ANO has noted that the complaints received by Airservices' Noise Complaints and Information Service (NCIS) were professionally handled and deserving of high praise. The timely and quality development of a series of responsive management strategies to support effective communications with the high numbers of contacts from Perth residents, which included standard letter templates, information packs, FAQs, fact sheets and strategies to manage the volume of telephone calls, showed a maturity in complaints handling that the organisation should be proud of. The NCIS also remained highly responsive to requests from the ANO office during this time.
- 4.7 In July, Airservices published on its website a summary of feedback received during consultation and a response from Airservices. While the early feedback may have informed some of the subsequent communications plans of Airservices, there is no evidence that the change proposals themselves were amended to incorporate feedback from the communities. For example, the ANO is aware of a community member's proposal for an alternative southern departure route that, on face value, appeared to have the potential to fly over fewer residents than the procedure designed by Airservices. Airservices considered and dismissed the proposal on unconvincing grounds and the ANO had been pursuing this when the night-time respite trial was cancelled.
- 4.8 In parallel with the consultation activities, work proceeded on detailed environmental assessments for the three initiatives. Unfortunately, delays in release of these assessments to the public meant that the potential impacts and benefits of the proposed changes were not available to the community during the consultation period. Consequently, the community could not reasonably contribute their feedback based on clear and accurate information.
- 4.9 Airservices' Communication and Consultation Protocol states that Airservices "seek[s] to provide interested parties with the opportunity to learn and understand how a change may impact them, why it is necessary and to provide an opportunity for feedback". The ANO considers this was not achieved for any of the initiatives pursued in Perth this year due to the unavailability of detailed information. At the time that the preferred runways change was implemented the ANO and the community were still awaiting information about the Environmental Assessment of the change and on what basis Airservices had determined that the change represented a noise improvement. At the time of this report, the ANO considers that the responses provided do not adequately address the concerns raised. Additionally, when the smart tracking route was introduced, the ANO was still not convinced that the change represented a noise improvement or that adequate consultation had been undertaken with those likely to be affected by the change. These issues are explored in greater detail for each change below.

5 Issues arising from complaints to the ANO

5.1 Complaints about the Perth proposals made to the ANO office can be summarised as follows:

- Members of the communities to the south of the airport were concerned about the nature of the consultation process and that the night-time respite trial was definitely going to proceed regardless of the outcome of further environmental assessment and consultation processes. They were concerned that the significant amount of aircraft noise already experienced in the area from arrivals to Perth Airport and from activities at Jandakot Airport had not been duly considered. Further, a series of unannounced departures of the heavily-laden South African Airways A340 flight at midnight over the area generated concern that the trial had already commenced, without due process.
- Some members of the community to the north of the airport were concerned that they did not have a clear understanding of the proposed change to the preferred runways and were not able to present considered views about this proposal. They considered that their interests had been disregarded.
- Members of the communities along the Swan River corridor were aggrieved that a proposal on which they had put considerable hope of an improvement in the levels of aircraft noise, will not now proceed. It is fair to say that many of these complainants felt betrayed as they had considered the night-time respite trial was a promise that had now been broken. They expressed concern that the trial was cancelled because residents in other areas went to the media and lodged a lot of complaints. They felt that the trial should have been run to validate the modelled findings in the Environmental Assessment before a decision about the route was made.
- Some members of communities under the new smart tracking route have expressed concern that there has been a lack of information available about the new route, especially its impacts now and into the future as more aircraft adopt the procedure.

5.2 This report will consider these issues by looking in detail at the three initiatives and the processes that surrounded them.

6 Preferred runways

The proposal

6.1 This change was intended to change the runway preference procedures for Perth Airport. The existing arrangements preferred arrivals from the north onto the main runway and from the north-east onto the cross-runway and departures to the south from the main runway. The change would make all runway ends equally preferred for departures and arrivals, with the exception of the south-western end of the cross runway. The purpose of the change was described by Airservices as being:

“This change will provide the community with clarity while retaining the flexibility pilots and Air Traffic Control need to manage their aircraft safely and efficiently. It is also expected to provide a noise improvement for residential areas which are most affected by the current runway preference system, to the south-west of the airport.”

6.2 At the time of public announcement, this change was proposed to be implemented in May 2015. It was implemented on 28 May 2015.

6.3 A number of concerns arose about this change in relation to:

- Public information and consultation
- Responsiveness to ANO requests for information
- Assessment of the proposal
- Decision-making processes

Each is addressed in turn below.

Public information and consultation

6.4 The preferred runways change was part of what was presented as a package of changes to deliver a net noise benefit to the Perth community due to the interaction of the three proposed changes. The material provided in support of the change gave some information about the expected impact in terms of aircraft movements and noise impacts for only some potentially affected communities. Most importantly, the material did not provide any clear explanation of how the change would lead to an overall improved noise outcome. The Environmental Assessment stated that the change “will provide a noise improvement for residential areas which are most affected by the current runway preference system, to the south-west of the airport”. No explanation was provided as to how Airservices determined that the south-west of the airport was the ‘most affected’.

- 6.5 The ANO attended most of the consultation sessions that followed the March 2015 PACF announcement of the Perth Noise Improvement Initiatives. It is the ANO's view that consultation on the preferred runways change was limited in the sessions. All sessions were heavily dominated by interest in the proposed night-time respite trial. Any discussion of the preferred runways change was based on early analysis and assumptions that the noise impacts would be negligible, except in the south-west where the greatest benefit was anticipated. Consequently, residents who attended the sessions received little information about the change or its likely impacts and therefore had limited opportunity to provide considered feedback.
- 6.6 The Environmental Assessment for the preferred runways change was not available at the time of the announcement and subsequent community consultation. Indeed, it was never made available publicly prior to the change being implemented. Airservices has not published it even now (despite a previous commitment that it would), although the ANO understands that it will be provided to members of the public if requested. Airservices has elected to produce an Environment Analysis Summary, which, for the preferred runways change introduced on 28 May 2015, was first published in August 2015 (and updated in September).
- 6.7 Additionally, Airservices' Noise Complaints and Information Service rely on a suite of information packages, template letters, fact sheets and FAQ materials in responding to individual complaints and enquiries. The ANO is on the whole satisfied with this material as used in complaint-handling. However, the ANO is concerned that some of the information downplays the aircraft noise impacts of the preferred runways change.
- 6.8 For example, in Airservices' Environment Analysis Summary and other publicly available material, the effects of the preferred runways change in Guildford are described as follows:

"while departures recorded at the Guildford monitor are louder than arrivals for some aircraft types by between two and four decibels (dBA) the net increase of one additional aircraft a day over the area is not likely to be noticeable."

The ANO considers this to be incorrect based on Airservices' own data:

- it says that departures are louder for only some aircraft types, when the detailed Environmental Assessment states that "the noise levels recorded at Guildford [show] that all aircraft types are louder on departure"
- it states the difference as being between two and four decibels, when the detailed Environmental Assessment shows that for over 90% of the recorded events the average difference is between 4.4 and 5.4 decibels.

- it describes the change as not likely to be noticeable, despite the widely accepted guide that a change of 3 decibels will be perceptible, 5 decibels is generally noticeable and 10 decibels is perceived as a doubling/halving of the noise. Further, the detailed Environmental Assessment states that in Cannington (where there will be an equivalent change but from the noisier departures to the quieter arrivals) there will be “differences of up to 5.4 dB(A), so a reduction in noise may be perceptible”. This is then reflected in the Environment Analysis Summary as “there is likely to be a noticeable reduction in noise level in Cannington”, yet the same change in Guildford of up to 5.4 dB(A) – but in Guildford’s case reflecting a worsening rather than an improvement in the noise levels – is presented as “not likely to be noticeable”.

Recommendation 1: Airservices should explain the discrepancy in its public information when compared to their detailed Environmental Assessment and, if found to be in error, correct all public information and, as far as practicable, advise all individuals who had received incorrect data of the correction.

6.9 Another example of Airservices not presenting comprehensive information about noise impacts is in a recent answer provided by Airservices to a question raised at the September 2015 meeting of the Perth Airport Community Forum (PACF). Airservices was asked to respond to a Guildford resident who was seeking to understand her experience of an increase in departures over Guildford, whether this was the result of a change introduced in response to people in other suburbs complaining, whether it is temporary and what other changes could be made to reduce the impacts in Guildford. Airservices responded that:

“There are more departures to the north during the winter months at Perth each year due to seasonal wind changes. More information about this is available in the quarterly Perth Aircraft Noise Information Reports at [Airservices website]”

This very short response does not respond to the concerns raised. Given the preferred runways change introduced by Airservices in late May, which was intended to increase the number of departures over Guildford, it seems disingenuous that Airservices chose not to mention the possibility that this change may have contributed. When the ANO asked Airservices to explain why it had not provided information about the change, Airservices advised that:

“The change introduced in May was not listed as a potential reason for the increase in departures as... [a local Perth] Manager confirmed the change to runway preference had made no difference to how they were managing the flights (which left the only reason for more departures than arrivals over the area being the change in seasonal wind direction). The answer is therefore accurate...”

The ANO is concerned that this response suggests that the preferred runways change has apparently not met its objectives (although it is not clear what data this is based on or if it is only the anecdotal account of one individual). Airservices’ decision to not include information about the possible impacts in Guildford being potentially due in part to the change is pre-emptive when no formal post-implementation review has been completed to clearly determine whether or not the change has had an impact.

Recommendation 2: Airservices should correct the public record at the next opportunity through the PACF to provide a comprehensive answer to the Guildford resident's issues, which includes an explanation of the potential for Airservices' preferred runways change to have contributed to the resident's experience of an increase in take-offs over the area.

6.10 The ANO has raised concerns about under-statement of potential noise impacts in previous reports and responses to complaints. Complaints to the ANO office suggest that some community members do consider the preferred runways change has been noticeable and detrimental. The ANO notes that Airservices has committed publicly to undertaking a post-implementation review of this change in September 2016. The ANO will closely monitor this review to ensure that it goes beyond simply assessing whether the change has met the intent, but also addresses whether the change actually represents an overall noise improvement for Perth, considering the impacts across all areas that have been affected by the change.

Recommendation 3: For all changes to air traffic management that will have an effect on aircraft noise impacts, Airservices should provide clear information to the public on both the justification for the change and the expected changes in aircraft noise in time for meaningful consultation and certainly prior to implementation of the change.

Recommendation 4: Airservices should present potential aircraft noise impacts accurately and avoid under-statement.

Recommendation 5: Airservices should review and amend the currently available information about the preferred runways change to clearly present the expected noise outcomes.

Recommendation 6: Airservices should ensure that its post-implementation review of the preferred runways change addresses whether the change actually represents an overall noise improvement for Perth, considering the impacts across all areas that have been affected by the change. If the change does not deliver an overall noise improvement for Perth, Airservices should revert to previous arrangements or propose an alternative that is expected to deliver a noise improvement.

Responsiveness to ANO requests for information

- 6.11 On the available information following the proposal announcement, the ANO was not able to discern how the proposed change would deliver a noise improvement. The ANO sought clarification from Airservices on how Airservices had determined that the change would be a better overall noise outcome. The ANO also asked on what basis Airservices considered the community to the south-west “the most affected” residential area, when numerous other areas were affected by the arrivals and/or departures under the original runway preference arrangement and, in the case of suburbs such as Guildford (just north of the main runway and affected by both arrivals and departures), arguably far more affected.
- 6.12 The ANO was advised that the answers to our questions would be available when the Environmental Assessment had been completed. The ANO repeatedly sought advice on when this would be available. ANO requests were made on and prior to the proposed implementation date of the change. Having not received the Environmental Assessment, the ANO continued to pursue the request after implementation occurred. On 12 June, the ANO office was advised that “the environmental assessment for this is finalised but is still a draft document – it will be forwarded to your office when in final form”. The completed Environmental Assessment was subsequently provided to the ANO office on 8 July. The Environmental Assessment provided had been completed and approved on 4 March.
- 6.13 The copy of the Environmental Assessment provided to the ANO included a number of sections that have redacted data. The ANO first sought access to this data on 10 July and made a number of subsequent requests when the information was not forthcoming. Airservices provided the material on 18 November, over four months since the original request was submitted. In addition, the ANO has sought information on the impact of the change for those affected by arrivals and departures at the south-western end of the cross-runway. Airservices has twice stated that the information is available in the Environmental Assessment, pointing to specific page and paragraph numbers. This is incorrect. The Environmental Assessment only includes one sentence describing the pre-change use of the runway and no discussion of what impacts are expected (if any) as a result of the change. This should be addressed in the post-implementation review.
- 6.14 The ANO continues to pursue discrepancies in the information provided by Airservices and is yet to receive adequate responses. The handling of ANO requests for information about this change has been poor in terms of timeliness and content.

Recommendation 7: Airservices should respond to all ANO requests with complete, accurate and timely information.

Recommendation 8: Airservices’ post-implementation review of the preferred runways change should include a discussion of the impacts of the change in all areas affected, including for the suburbs affected by departures and arrivals to each end of each runway.

Assessment of the proposal

- 6.15 The ANO has many concerns about the way that the detailed Environmental Assessment was conducted. Many of these have been raised with Airservices and the response has been that “we note your feedback and [Airservices] will consider this in future assessments”. The concerns the ANO has with the Environmental Assessments for all three of the Perth Noise Improvement Initiatives considered this year suggest that Airservices is not adequately considering the aircraft noise issues and impacts of proposed changes in these assessments. It is also concerning that many of the ANO points had not been identified and addressed internally before finalisation of the assessments.
- 6.16 For example, analysis of the impacts of changes in different areas at night-time, and specifically the impact in terms of nights of respite, are lacking. In the preferred runways change, there seems to only be analysis of locations where noise monitors are permanently located. This meant that the area further south of the airport (Canning Vale and surrounds), which is affected by arrivals to the main runway but not by departures, was entirely overlooked in the assessment. This was a significant oversight, given that the area was likely to be negatively impacted by the change, which would increase the number of nights of arrivals over the area and reduce their number of nights of respite from noise.

Recommendation 9: Airservices should review the feedback from the ANO about its Environmental Assessments and incorporate better analysis of aircraft noise issues and impacts in its environmental assessment processes. This should include introduction of a robust process of critical review before finalisation of assessments.

Recommendation 10: Airservices’ post-implementation review should present the impacts of changes in different areas at night-time, and specifically the impact in terms of nights of respite.

Decision-making processes

- 6.17 It is not clear to the ANO if the decision to implement the preferred runways change was made on the basis of all relevant material. The section responsible for proposing and pursuing the change (hereafter called ‘the proponent section’), advised the ANO office that the Environmental Assessment was not complete at the time the change was implemented and that “[the proponent section] had utilised a draft report for the purpose of getting the data needed to pursue this change”. The proponent section therefore relied on draft data in its consultations with the community and the ANO is concerned that this did not provide the community with a fair chance to consider the potential impacts and provide relevant feedback, which should also have been a consideration by decision-makers prior to the change being implemented.

6.18 There appears to have been a serious breakdown in internal communications between the proponent section and the section responsible for preparing the detailed Environmental Assessment (hereafter called 'the EA section'). The EA section had completed the Environmental Assessment and signed it off as approved on 4 March 2015, yet the proponent section was working from a draft version. It is surprising to the ANO that the proponent section did not follow up with their colleagues in the EA section regularly to find out progress of the assessment on which their proposal relied. In particular, when the ANO office requested information about the Environmental Assessment and its availability, it seems unusual that no follow up occurred before providing the ANO with a response on behalf of Airservices. As a result of the communications breakdown and lack of follow up by the proponent section, the ANO office and the public were provided with incorrect information and were unable to properly evaluate and provide feedback about the change prior to its implementation.

Recommendation 11: Airservices should resolve its internal communication issues to ensure correct, adequate and timely information is provided to internal decision-makers, the ANO and the public about change proposals.

6.19 The Environmental Assessment concluded:

“As a result of the findings of this assessment consideration should be given to:

- the proposed changes being implemented on a trial basis
- appropriate community consultation be undertaken prior to implementation
- a post-implementation review be conducted, not less than 12 months after implementation...”

Airservices elected to implement the change permanently from the outset, in contrast to the Environmental Assessment suggestion that a trial be considered. Airservices did not, in the ANO's view, adequately consult the community about the potential impacts, given that they did not have available the Environmental Assessment information. Airservices has committed publicly to undertaking a post-implementation review of this change in September 2016. The ANO will closely monitor this review and the implementation of any actions that flow from it.

Recommendation 12: Airservices' post-implementation review should provide an explanation for why the change was implemented on a permanent basis despite the Environmental Assessment conclusion, and also assess the adequacy of community consultation undertaken.

Recommendation 13: Airservices should review its decision-making processes related to the introduction of this change and report to the ANO and the Board on any changes it will introduce to ensure that future air traffic management changes are made with due consideration to relevant information.

7 Introduction of Smart Tracking

The proposal

- 7.1 Smart tracking is a procedure that is based on satellite location technology and is expected to be the future of aircraft navigation systems in time. It brings with it many advantages including greater flexibility in air route design which will deliver more fuel efficient flight paths and more flexible opportunities for managing aircraft noise. Australia has made international commitments to introduce smart tracking in time to provide best practice air traffic management and meet the needs of the international aviation industry.
- 7.2 The smart tracking route introduced at Perth on 17 September, for equipped aircraft arriving from the north and east to the southern end of the main runway, was designed to in part replicate an existing visual approach. The visual route was also amended as part of the introduction of smart tracking project. Consequently, new areas would be overflown by both the introduction of the smart tracking route and the relatively small change to the visual route. Further, the smart tracking arrival path will operate at night over areas that were previously only overflown by arrivals on the visual route by day. This area is, however, overflown by aircraft departing the main runway to the south and turning east, including at night.
- 7.3 Despite the obvious benefits of the new technology it carries with it a range of potential negative noise effects. As in the case of the new arrival route into Perth Airport, it can result in changing the impact of aircraft noise. This may be a good outcome but can also result in disadvantage for residents under the new routes. In this context, while it may be necessary that Airservices implement smart tracking routes at all airports in time, this should not be done without giving due consideration to aircraft noise issues and community wishes. Introduction of this smart tracking route has raised several concerns, including:
- Public information and consultation
 - Assessment of the proposal
 - Balancing noise outcomes

Each of these is discussed below.

Public information and consultation

- 7.4 The ANO attended most of the consultation sessions that followed the March 2015 PACF announcement of the Perth Noise Improvement Initiatives. It is the ANO's view that consultation on the introduction of smart tracking was limited in these sessions, which were heavily dominated by interest in the proposed night-time respite trial. Discussion of the smart tracking change tended to focus on the estimated number of aircraft that were expected to use the new track immediately upon its release. This was highlighted in the context of delivering a reduction in impacts on the communities from which the arriving aircraft would be removed.

7.5 There was no clear information on the increase in traffic on newly affected communities to the south-east of Perth Airport (including East Cannington, Maddington, Kenwick and Beckenham) nor about what impacts would result from the consequential change in the visual approach path beyond removing overflights from some areas of the Perth Hills.

7.6 The ANO asked Airservices about its strategy for consulting the communities potentially affected by introduction of smart tracking and Airservices advised on 12 June that:

“Our environmental analysis is yet to be completed and will be published in full and summary form as soon as it becomes available. Any adjustment to our community consultation for those areas impacted by this change will reflect the findings of the analysis.”

Airservices’ Environmental Assessment was completed on 20 July with the conclusion that “Consideration may be given to establishing a community relations strategy with a focus on the East Cannington, Maddington, Kenwick and Beckenham areas.” It is not clear what adjustments Airservices made to its community consultation in light of this as no additional community consultation sessions were held. The public Environment Analysis Summary document was only released in August, meaning that the community had only a limited window to express any feedback about the proposal in light of this information, prior to its implementation.

Recommendation 14: Airservices should target its community consultations to areas that are identified as potentially affected by the proposed change and ensure that communities receive all relevant information in a reasonable time to be able to provide feedback on changes prior to implementation.

Assessment of the proposal

7.7 In the ANO’s view, the interrelationship between the preferred runways change and the smart tracking change has not been clearly presented in the Environmental Assessment. Averaging of movements over the year is an unhelpful way of assessing the impacts of a change when, depending on the runway in use, an area may be subject to either all departures or all arrivals. For example, on an average day when departures are to the south, the areas to the south-east of Perth Airport are overflowed by departing aircraft that turn towards the east from the main runway after take-off. On an average day, prior to the change, when arrivals are from the south, the area only receives overflights by aircraft using the visual route, which meant that they had no flights at night or at times of poor visibility. The Environmental Assessment averages both the arrivals and departures to an annual daily average and then compares this with the average daily figures expected following introduction of smart tracking. It determines that “the net increase in traffic of approximately 3 movements per day is considered to be below the threshold for significance”.

- 7.8 Similarly, the Environment Analysis Summary concludes that “the average increase of the number of flights over these areas is 3 flights per night”. It is not explicit that this is on nights that would otherwise have been free of aircraft noise or that the estimated additional night-time arrival flights will not be spread across all nights of the year as implied, but rather will be concentrated on those nights when aircraft arrive from the south. The preferred runways Environmental Analysis Summary suggests this would be on an estimated 124 nights a year. The smart tracking Environmental Assessment shows the new route will create an estimated increase in night-time arrivals of 1593. Dividing this by 365 nights of the year gives 4.3 flights per night. The Environment Analysis Summary reports the average as 3 because it considers the reduction in departures over the area at night as a result of the preferred runways change will offset the increase in arrivals somewhat. That aside, the actual impact would be more properly shown by spreading the flights over those nights that they will actually be flown. That is, 1593 over 124 nights, which is equivalent to 12-13 flights on each of those nights when arrivals are to the south.
- 7.9 As with the night-time respite trial proposal, the Environmental Assessment and public Environment Analysis Summary fail to directly address the impacts in terms of night-time respite. Prior to the smart tracking change, areas to the south-east of Perth Airport had night-time departures when departures were being directed to the south, but they had respite on those nights when arrivals came in from the south. Introduction of the smart tracking change means that areas to the south-east of the airport would now have arrivals on those nights that were previously nights of respite. There is no recognition of this in the public material.
- 7.10 In the case of Airservices’ Environment Analysis Summary document, which was released in August after all consultation sessions had been held, the explanation of the change in the expected number of aircraft flying over the affected areas is unclear and potentially in error. The impacts from the preferred runways change do not appear to be fully accounted for as the increase in the number of visual approaches over the areas is not referred to in either the preferred runways Environmental Assessment or the smart tracking Environmental Assessment.
- 7.11 Further, although the use of smart tracking is expected to be on “average 3-4 flights per night and up to 13 on the busiest night” on introduction, it is also expected that use of smart tracking technology will be increasingly adopted by airlines and that the number of flights on this flight path will consequently keep increasing over time. There is no explicit reference to this in the public material or any estimation of these increased future impacts in the detailed Environmental Assessment. The Environmental Assessment states that:
- “The proposed RNP [smart tracking] approach to Runway 03, Perth Airport is not likely to result in significant environmental impact within the meaning of the Environment Protection and Biodiversity Conservation Act, 1999 (Cth) [EPBC Act] but only if implemented in conjunction with the proposed change to preferred runway use at Perth Airport (EA 940) noting ... the low numbers of night time overflights is marginally over the threshold values.”

7.12 The reliance on the low numbers – which are only low if averaged over every night of the year – is a concern. The Environmental Assessment for the night-time respite trial concluded that “Although the number of overflights in these areas would be low, the events will occur at a sensitive time of the day and may cause sleep disturbance”. In the night-time respite trial there was expected to be “an average of 6 flights per night and 10 on a busy night”. It is not clear to the ANO how the potential impacts of the night-time respite trial were deemed to be potentially significant (such that referral to the Environment Minister was recommended if the change was to proceed) and yet introducing smart tracking is not as significant, when it will apparently result in a similar number of overflights at a sensitive time, and it is expected that the smart tracking numbers will increase in time.

Recommendation 15: Airservices should include in its post-implementation review a detailed analysis of the actual impacts of the introduction of smart tracking and the associated change made to the visual approach route. It should consider impacts particularly at night-time, and re-visit the findings of the Environmental Assessment to determine if the change in fact did represent a potentially significant impact within the meaning of the EPBC Act.

7.13 Finally, while outside the interests of the ANO, it was noted that the smart tracking Environmental Assessment gave no documented consideration to CO2 emissions impacts expected to result from the change. This seems unusual as this is presented in the Environment Analysis Summary as a key benefit of the proposal.

Balancing noise outcomes

7.14 Airservices presents the benefits of introducing smart tracking as being beyond simply achieving a better noise outcome. For example, the Environment Analysis Summary identifies that “benefits include substantial fuel savings and reduced CO2 emissions” along with a reduction in noise for some areas. Offsetting this are of course, the potentially significant negative impacts for those areas that will now have the night flights associated with introduction of the smart tracking route. The ANO considers that Airservices should be explicit in presenting how it determined that the negatives are balanced by the benefits.

7.15 Complaints to the ANO office have highlighted that the new smart tracking route seems, on face value, to be moving an existing flight path from one residential area to another, and that this is not an improvement, but a shifting of the impacts. If a smart tracking route was needed to meet international obligations, why does it not replicate the existing instrument approach? It would be helpful if Airservices’ material demonstrated the considerations that went into determining that the chosen route was the best option of the available alternatives.

Recommendation 16: Airservices’ material in support of a proposed change should explicitly present how the negatives are balanced by the benefits and on what basis the chosen approach is optimal compared to viable alternatives.

8 Night-time respite trial

The proposal

- 8.1 The concept behind this trial was an exciting idea to try and reduce the total noise impact over the population of Perth. The idea was that night-time southern departures with destinations to the west and north would no longer make a right turn over the Swan River corridor. Instead they would continue south “over less populated areas to the east and south of Jandakot, at reasonably high altitude which aims to minimise the noise impact for residents below. Previously those aircraft would fly over built-up suburbs between Riverton and Mosman Park at much lower altitudes and creating much more noise”. Aircraft would use Jandakot airspace at night when restrictions that exist during the day are removed and thus fly over fewer people at a greater height than is achieved on the current path.
- 8.2 Given that the change would nevertheless be additional traffic for those to the south, the change was linked to the introduction of the new smart tracking path that would reduce some of the arrivals that the communities to the south were exposed to, and that the use of this path would increase over time. Although the arrivals that Canning Vale and surrounds would lose were fewer than the departures they would gain (at night approximately 1600 arrivals diverted but over 2500 departures added), the expectation based on early analysis was that the departures would be at a greater height than the arrivals and therefore quieter.
- 8.3 The decision not to proceed with the trial was made when the detailed Environmental Assessment showed that the aircraft types operating in the night-time hours would not reach an altitude “that would achieve the intended noise benefit”. In addition, the detailed population analysis demonstrated that “there would be more people impacted by aircraft noise than under current procedures”. On balance, it would not represent an overall noise improvement. Even though it would have delivered on its objective of providing night-time respite for the Swan River suburbs, this was not able to be achieved without significant detriment to other areas of the Perth community.
- 8.4 The ANO agrees with the decision not to proceed with the trial.
- 8.5 The night-time respite trial raised four separate issues of concern:
- Manner of announcing the proposal
 - Consultation
 - Assessment of the proposal
 - Manner of announcing the decision not to proceed

Manner of announcing the proposal

8.6 The increase in noise for those living under the busy Perth air routes justifies Airservices' efforts to try to find noise improvements for Perth residents. In this case the proposal for the night-time respite trial appeared at first review to be a viable, reasonable and achievable improvement. In these circumstances there was merit in the early announcement of the proposal while simultaneously commencing more detailed analysis and consultation.

8.7 The proposal had been developed as part of Airservices' Strategic Noise Improvement Plan. The large number of SNAG members present at the announcement were understandably pleased by the three proposals, and the night-time respite trial in particular, as they stood to have respite from aircraft noise every night from 10 pm to 5 am, as well as a potential reduction in the number of departures over their area at other times. The Swan River corridor, covered by SNAG's membership, would still be subject to a lot of aircraft noise from 5 am onwards on those days when departures were directed south from the main runway, but the potential for night time respite every night was a very welcome prospect. In presenting the proposal, Airservices emphasised the extent of the potential benefit:

"While the full respite period would be 10pm to 5am on those days Runway Twenty One is used for departures, there are very few departures after 5 pm each day so there would be additional hours of relative respite available – essentially a twelve hour period each day of very little and then no aircraft noise (5 pm to 5 am)."

8.8 Although Airservices concluded its presentation with the caveat that "The proposed trial would run for twelve months and we aim to start between August and November 2015 subject to our community consultation and environmental assessment processes being completed", the next sentence perhaps undermined this by sounding more definitive about all three changes proceeding: "That is a quick outline of the three changes we propose to make this year." During the speech, Airservices also used other statements that could have been interpreted as indicating certainty that the trial would proceed, such as: "when the trial goes ahead for twelve months..." and "if after a year the trial is deemed successful...".

8.9 Canning Vale residents reacted in alarm immediately after the PACF presentation as word quickly filtered out that the trial would shift night-time departure noise over Canning Vale to provide the Swan River residents with "respite every night of the year". Concerned Canning Vale residents engaged with the media and also rallied neighbours to contact Airservices, the ANO, their local MPs and councillors to ensure that their concerns were heard. What was of most concern to the Canning Vale residents was that the area already experienced a high load of aircraft noise from arrivals, especially during the winter months, and from the Jandakot traffic, and that due consideration did not seem to have been given to the existing noise.

8.10 The announcement was greeted as a planned trial rather than as a proposal for a trial. This expectation that the trial would proceed was clearly held by both the potential beneficiaries and by those that would be negatively impacted by the new departure route.

8.11 In light of hindsight it is clear that the messages around the aircraft noise over the areas affected (both the Swan River corridor and the areas to the south of the airport) were likely to become confused, misheard and subsequently misrepresented. The charged atmosphere of a community consultative meeting where emotions were running high provides a particularly challenging environment for any communications. Consequently, it is especially important that explicit distinction is made between a proposed trial and a planned trial and what considerations remain that could result in the proposed trial not proceeding at all.

Recommendation 17: In announcing proposed changes, Airservices should explicitly emphasise the degree of uncertainty and the known factors that will potentially influence the likelihood of the proposed change proceeding.

Consultation

8.12 Airservices is committed to community consultation as a key element of developing proposals for changes to air traffic management that may have an impact on residents. To Airservices' credit, the proposed changes were supported by a plan for consultation. It was evident from the initial consultations that the locations, timing and style of the consultation needed to be adapted to the needs of the relevant communities. Again to Airservices' credit, plans for further consultation (although the additional sessions were subsequently cancelled) were adapted to respond to feedback and this feedback has been incorporated into the internal review that Airservices has conducted.

8.13 Nevertheless, there is value in noting some of the specific issues that should be considered for further consultation. Notable issues that arose in the consultation undertaken, particularly as it related to the night-time respite trial, included:

- Sessions were all scheduled for early evening on weeknights, limiting those who could attend (with the exception of the first session on the day after the announcement)
- Sessions were located outside the most negatively affected suburb (Canning Vale). Although later sessions were scheduled to be held in the suburb, this was not clearly advertised at the outset
- Sessions did not originally provide for any interpreter services – given that there were no other consultation sessions scheduled, many Canning Vale residents attended the Gosnells and Maddington sessions. This was expected as Airservices had targeted a letter-box drop in the Canning Vale area advertising the information sessions, so it could have been foreseen that many residents with non-English speaking backgrounds (particularly Chinese speakers) would potentially attend and require interpreter services

- Sessions did not include plans for any formal presentation. This meant that all attendees (other than the small proportion who had read all the documentation and understood it) required a personal presentation which was both draining on the limited staff available and limited in the number of people who could be engaged. A presentation should be included in the program (either in the form of a video played on a loop, a static step by step explanation of the change proposal and process, and/or a live presentation at an advertised time or times during the sessions)
- The documentation for the changes was in a booklet entitled “Perth Aircraft Noise Improvements”. This title was also used for the material that was letter-box dropped to residents in Canning Vale (and perhaps other areas). It was misleading because, for some, the changes would not be an improvement. Although the material set out the expected effects of the changes, it was not made clear that these expectations were based on early analysis or subject to consultation and detailed assessment processes being completed.
- A number of complainants mentioned that they did not receive the letter-box dropped material until the day of or after the consultation sessions.

Recommendation 18: Airservices should consider the social, economic and cultural context of the communities it is consulting and ensure consultation strategies enable accessibility, understanding and an opportunity for genuine engagement in the issues within those communities.

8.14 The common conundrum of when to begin public engagement is perhaps easiest to find in retrospect. Given that, in this case, the Environmental Assessment was the factor that led to Airservices’ decision not to proceed with the trial, it could be suggested that, to avoid the risk of future announcements creating undue expectations, no announcement should be made until the detailed Environmental Assessment has been completed. The problem with this approach is that it would delay the public consultation and discussion. If the Environmental Assessment ultimately supported proceeding with the trial, the delay in commencing consultation would potentially delay the introduction of the trial and any potential benefits it may deliver. Further, consultation before finalisation of the Environmental Assessment enables public input into the design of the change and community concerns to be considered and addressed in the assessment.

8.15 The flip-side to this approach is that the consultations were based only on a high-level concept and Airservices was not able to present concrete data to support their contention that the change represented an improvement. Many of the responses to specific questions went along the lines of ‘this will only be available when the environmental assessment work is complete’. This meant that the early consultation only really provided Airservices with an insight into what the community wanted to know and did not really allow for informed feedback to be provided. It was therefore essential that further consultation activities should have been scheduled prior to introducing the change to follow up with the detail and seek feedback on this. Such sessions were scheduled by Airservices, although subsequently cancelled following the decision to cancel the trial.

- 8.16 That said, since Airservices had several initiatives to consult about, it is likely that deferring the consultation activities for the night-time respite trial until after the Environmental Assessment was completed would have incurred additional cost due to the need for additional separate consultation activities, rather than being combined with consultations relating to the other changes proposed. Therefore, in this case, the benefits of consulting prior to the assessment being finalised justify this approach.
- 8.17 The ANO was particularly concerned that Airservices did not foreshadow during its consultations that it would be redirecting some flights onto the trial flight path at night prior to commencement of the trial. Contrary to its Noise Abatement Procedures (which require that an aircraft that is not following the Standard Instrument Departure (SID) procedure should be processed in such a way as to approximate the SID procedure), air traffic controllers directed the South African Airways A340 aircraft on a number of occasions to depart directly south on a route that approximated the proposed trial flight path. As well as raising concerns about the noise impacts of this low noisy flight over the suburbs at midnight, the lack of prior notice generated confusion in the community about whether the trial had already started.

Recommendation 19: Airservices should consult openly with communities, even when making only temporary changes, and provide as much information as it can prior to implementing any such change.

Assessment of the proposal

- 8.18 It is important that an assessment of the proposal be presented to the public in a form that is easily understood and that addresses the issues and concerns that the community can be expected to be most concerned about. Such an assessment needs to present the pros and cons of the proposal and the rationale for the decision that Airservices has made about it. In the ANO's view, such an assessment was lacking in Airservices' community engagement on the night-time respite trial proposal.
- 8.19 The detailed Environmental Assessment that Airservices undertook was not completed until 16 July and was not made available to the public until after Airservices' decision to cancel the trial was made, and only then on request. This delay meant that Airservices could not respond to many of the key concerns raised in the public forums and through complaints. The ANO sought information to respond to community concerns and was repeatedly advised that the answers to our questions and concerns would be addressed in the Environmental Assessment that was yet to be finalised. The ANO was advised that "Our environmental analysis is yet to be completed and will be published in full and summary form as soon as it becomes available". Airservices was unable to provide a timeframe for the likely completion for some time and then, when estimated dates were provided, they were not met.

8.20 Contrary to the advice provided, the ANO notes that Airservices decided not to release the detailed Environmental Assessment, but rather produced an “Environment Analysis Summary”. This document provides a high level summary of the environmental considerations included in the detailed environmental assessment, however it does not provide a comprehensive assessment of the proposal.

8.21 Ideally, Airservices should present the community with comprehensible information that outlines:

- the objective of the change
- the findings of Airservices’ various considerations (including its environmental assessment)
- Airservices’ response to issues or concerns raised during consultation activities and through complaint feedback
- the pros and cons that lead to the final conclusion and decision.

8.22 The ANO would also like to see Airservices publish all relevant material that underpins its decisions, such as the detailed Environmental Assessment, so that those seeking deeper understanding of the detail can pursue this.

Recommendation 20: Airservices should produce a proposal assessment for each change that provides a comprehensible outline of any change proposal, including the pros and cons, key considerations, the conclusion and the final decision Airservices has made. Relevant material that underpins the decisions should also be published for those seeking greater detail.

8.23 The ANO considers that the rationale for Airservices’ decision about the night-time respite trial as presented by Airservices was deficient, and that this reflects the limitations of the environmental assessment that was conducted. Although the ANO does not have specific expertise in conducting environmental assessments, it is the ANO’s view that the Environmental Assessment for the proposed night respite procedure falls well short as a comprehensive assessment of the potential environmental impacts (specifically in terms of aircraft noise impacts). In the ANO’s view this has been a factor in the difficulty that Airservices has had in clearly explaining the basis for not proceeding with the trial. Specifically, the Environmental Assessment did not provide an explicit analysis of the issue of respite, even though delivering night-time respite was the stated primary objective of the proposal. The ANO considers that the Environmental Assessment could have been improved had it:

- Included data and analysis of the number of nights of respite across a year experienced by each area that would be affected by the change, including the Swan River corridor and the areas to the south of the airport. This could have considered data from the previous few years as well as anticipated the expected changes in respite that would result from parallel change projects (the preferred runways change and introduction of smart tracking).

- Considered the comparative night-time load of aircraft in the areas affected by the potential change. This may, for example, have highlighted that the suburbs to the south of the airport were getting more aircraft on those nights when they were overflown by arrivals and indeed more night time aircraft in total across the year than the Swan River corridor experienced.
- Made explicit the important finding that the proposal would have guaranteed that suburbs south of the airport would have aircraft overflying more or less every single night of the year, and the Swan River corridor would get the aircraft noise on no nights at all (from 10 pm until 5 am). In effect night time aircraft noise (up to 5 am) would be entirely removed from one highly noise affected area and imposed on another highly noise affected area.
- Given appropriate consideration to the existing aircraft noise impacts in the areas south of the airport that result from operations at Jandakot Airport.
- Avoided the use of annually averaged numbers when considering the impacts. The nature of the current and proposed flight path is that it is only used on those nights when departures are being directed to the south. In 2014, there were apparently 44 nights when there were no departures to the south. Hence to divide the total number of departures that occurred at night on the existing path by 365 will understate the average number of departures on any night when the departures use the southerly departure route. Similarly, the 'busy night' analysis incorrectly reported that introduction of the preferred runways change, which would reduce the number of nights that departures were directed south, would lead to a reduction in the number of flights on a busy night. The ANO has previously made a recommendation to Airservices about considering the usefulness of averages in cases of a wide spread of data in its public information (see Review of Aircraft Noise Information Presentation and Complaint Resolution: Perth - November 2011).
- Documented the results of the trial flights Airservices arranged over the southern suburbs in the lead up to the trial. Airservices advised that it used these flights to temporarily assist the design of the proposed trial flight path, however there is no public record of the data collected and what, if any, changes were introduced to the proposed trial flight path as a result of these flights. Airservices acknowledged that the aircraft "has poor climb performance on take-off and will factor this into the trial process should it proceed" and the flights were operated without prior notice to the community at approximately midnight on multiple occasions. The ANO considers that Airservices should account to the public on the outcome of its actions.
- Given consideration to whether alternative routes (such as that proposed by a community member during the consultation process) would potentially deliver a better noise outcome than the route proposed by Airservices.

8.24 The communities in the Swan River corridor felt it was unfair that they were getting much more than a fair share of aircraft noise and sought a fairer sharing of the noise impacts. It is clear that if Airservices' Environmental Assessment had adequately presented an analysis of the amount and patterns of respite that would result from implementing the proposed trial flight path, it would not provide a fair way to share the noise. It is vital that analysis and decision making reflect the key issues and concerns of communities. Doing so will provide valid, comprehensible and defensible decision-making.

Recommendation 21: Airservices should ensure its Environmental Assessments for changes in air traffic arrangements reflect a thorough and transparent analysis of all key issues relevant to aircraft noise impacts, and specifically reflecting the key issues and concerns of communities.

The manner of announcing the decision not to proceed

8.25 For the ANO, the decision not to proceed was correct when considered, at its most basic level, as a decision based on fairness. The ANO considers that the proposal would have resulted in an outcome that would have been less fair than the existing arrangements, rather than fairer. Unfortunately, Airservices' analysis that was presented with the decision not to proceed did not highlight this point, as it was not the basis of Airservices' decision. Instead Airservices explained that:

“there would be more people impacted by aircraft noise than under current procedures. There would also be a major increase in noise levels for some areas that currently receive only a small number of overflights at night. This is exclusively related to most aircraft types being unable to achieve altitude in a manner that would create the intended noise benefit.”

8.26 While this may have been the basis for Airservices' decision, it was not a convincing argument when the community that was expected to benefit was asking that the noise be shared. In their view the comment that it would increase noise over areas that currently receive few overflights is a reason for proceeding with the change as this would deliver a sharing of the impacts. The statement about the aircraft not being able to achieve the altitude also implies that there may have been a situation where this change could have proceeded if the airlines only used different aircraft types. In the ANO's view, this is highly unlikely.

8.27 To move the night time noise to another community can appear to be a fair way to share the noise. In this case the points that should have been made most prominently were that the other community already received high levels of aircraft noise, including high levels of night time noise. Given the Swan River community's emphasis on noise sharing, it is reasonable to expect that explaining how this change was not going to achieve noise sharing, but would rather result in an unreasonably large share of the night-time noise falling on another community, may have been a more compelling way of presenting the decision to this community.

Recommendation 22: Airservices should tailor its public announcements about aircraft noise management to address the specific concerns and expectations of affected communities, as identified in consultation forums and aircraft noise complaints.

8.28 Another important consideration in the manner of announcing a significant decision, such as cancellation of the proposed trial, relates to timing and method of contact. Airservices discussed its decision with the ANO and outlined its communications strategy ahead of public engagement. The ANO was generally satisfied by the described approach, which included using direct SMS, email and mail (where necessary) to all individuals who had contacted Airservices from select Perth suburbs. Airservices' plan also included making personal contact by telephone with the Chairman of the Share Noise Action Group prior to the public announcement to personally take him through the decision. Airservices was also briefing relevant MPs, releasing a media statement, placing public notices in relevant local newspapers and updating its website material.

8.29 Unfortunately, Airservices did not personally contact the Chairman of SNAG as proposed and this meant he was caught unaware and confronted by his members about a decision he could not comprehend or explain. As a result, he communicated with his members the sense of betrayal he felt and this flowed through many of the complaints directed to the ANO. The ANO considers this an unfortunate mis-management of the announcement. Good faith early contact with the key stakeholder group leaders in both the Swan River and the southern suburbs could have helped to reduce some of the anger and misinformation that flowed in response to the announcement.

Recommendation 23: As far as practical, Airservices should make direct contact with community leaders prior to public announcements about issues that affect the community to help ensure that consistent information is passed on to residents.

9 Next Steps

9.1 At the time of writing, the decision has been made not to proceed with the night-time respite trial. Nevertheless community pressure remains to have the trial 'reinstated'. This is driven by a lack of understanding about the equity issues involved. The ANO considers that the unfairness of the trial needs to be clearly explained to show that it would be inappropriate to run the trial even as a short term research measure.

Recommendation 24: Airservices should not pursue the noise-respite trial as proposed in March 2015, even as a short term trial measure, and instead should put out clear information as to the inequitable consequences that would necessarily flow in terms of night-time respite.

9.2 The preferred runways and smart tracking changes have been implemented. Airservices has advised this office that the change is regarded as permanent but will be subject to post-implementation review approximately twelve months after the changes were introduced. It is important the review should set out clearly the reasoning behind the changes and report against this in terms of aircraft movements and aircraft noise consequences. The review must determine if the changes as implemented do provide a better noise outcome for the Perth community as a whole and if not should consider reversion to previous procedures or an alternative.

9.3 While the ANO office would consider it best practice to set out the case for change prior to introducing the change, it is critical that Airservices now provide a compelling case for the changes it has introduced prior to the post-implementation process commencing.

Recommendation 25: Airservices should set out the rationale behind the preferred runways and smart tracking changes implemented in Perth, including identifying the anticipated impacts in terms of aircraft movements and aircraft noise consequences, well ahead of the planned post-implementation review of these changes.

10 Conclusion

- 10.1 Airservices has made a strong commitment to responding positively to aircraft noise complaints and to delivering improvements to aircraft noise impacts where reasonably achievable. This is highly commendable and reflects world's best practice. The changes proposed for Perth in March 2015 were a genuine and credible attempt to identify solutions to significant noise issues in Perth.
- 10.2 Unfortunately, Airservices' processes to evaluate potential aircraft noise improvements, and to engage effectively with the communities that may be affected, are still evolving. As a result there have been many examples of how Airservices might have improved its assessment, consultation and information provision in pursuing the three proposals for Perth this year. Due to the weaknesses in the processes, communications and analysis surrounding the proposals, Airservices has been criticised for its initiatives. This is of great concern to the ANO given the merit in pursuing such initiatives. Nevertheless much of the criticism validly identifies the weaknesses that existed in this attempt to deliver a better noise outcome for Perth.
- 10.3 This report has set out 24 recommendations intended to improve the chances of future initiatives resulting in a better noise outcome or, where no opportunities for improvement are viable, providing communities with the assurance that all reasonable steps have been taken.

Attachment 1 Summary of Recommendations

The following table lists the recommendations made in this review. The ANO office will report on progress against the recommendations identified through regular quarterly reports, published on the ANO website.

Recommendation 1: Airservices should explain the discrepancy in its public information when compared to their detailed Environmental Assessment and, if found to be in error, correct all public information and, as far as practicable, advise all individuals who had received incorrect data of the correction.

Recommendation 2: Airservices should correct the public record at the next opportunity through the PACF to provide a comprehensive answer to the Guildford resident's issues, which includes an explanation of the potential for Airservices' preferred runways change to have contributed to the resident's experience of an increase in take-offs over the area.

Recommendation 3: For all changes to air traffic management that will have an effect on aircraft noise impacts, Airservices should provide clear information to the public on both the justification for the change and the expected changes in aircraft noise in time for meaningful consultation and certainly prior to implementation of the change.

Recommendation 4: Airservices should present potential aircraft noise impacts accurately and avoid under-statement.

Recommendation 5: Airservices should review and amend the currently available information about the preferred runways change to clearly present the expected noise outcomes.

Recommendation 6: Airservices should ensure that its post-implementation review of the preferred runways change addresses whether the change actually represents an overall noise improvement for Perth, considering the impacts across all areas that have been affected by the change. If the change does not deliver an overall noise improvement for Perth, Airservices should revert to previous arrangements or propose an alternative that is expected to deliver a noise improvement.

Recommendation 7: Airservices should respond to all ANO requests with complete, accurate and timely information.

Recommendation 8: Airservices' post-implementation review of the preferred runways change should include a discussion of the impacts of the change in all areas affected, including for the suburbs affected by departures and arrivals to each end of each runway.

Recommendation 9: Airservices should review the feedback from the ANO about its Environmental Assessments and incorporate better analysis of aircraft noise issues and impacts in its environmental assessment processes. This should include introduction of a robust process of critical review before finalisation of assessments.

Recommendation 10: Airservices' post-implementation review should present the impacts of changes in different areas at night-time, and specifically the impact in terms of nights of respite.

Recommendation 11: Airservices should resolve its internal communication issues to ensure correct, adequate and timely information is provided to internal decision-makers, the ANO and the public about change proposals.

Recommendation 12: Airservices' post-implementation review should provide an explanation for why the change was implemented on a permanent basis despite the Environmental Assessment conclusion, and also assess the adequacy of community consultation undertaken.

Recommendation 13: Airservices should review its decision-making processes related to the introduction of this change and report to the ANO and the Board on any changes it will introduce to ensure that future air traffic management changes are made with due consideration to relevant information.

Recommendation 14: Airservices should target its community consultations to areas that are identified as potentially affected by the proposed change and ensure that communities receive all relevant information in a reasonable time to be able to provide feedback on changes prior to implementation.

Recommendation 15: Airservices should include in its post-implementation review a detailed analysis of the actual impacts of the introduction of smart tracking and the associated change made to the visual approach route. It should consider impacts particularly at night-time, and re-visit the findings of the Environmental Assessment to determine if the change in fact did represent a potentially significant impact within the meaning of the EPBC Act.

Recommendation 16: Airservices' material in support of a proposed change should explicitly present how the negatives are balanced by the benefits and on what basis the chosen approach is optimal compared to viable alternatives.

Recommendation 17: In announcing proposed changes, Airservices should explicitly emphasise the degree of uncertainty and the known factors that will potentially influence the likelihood of the proposed change proceeding.

Recommendation 18: Airservices should consider the social, economic and cultural context of the communities it is consulting and ensure consultation strategies enable accessibility, understanding and an opportunity for genuine engagement in the issues within those communities.

Recommendation 19: Airservices should consult openly with communities, even when making only temporary changes, and provide as much information as it can prior to implementing any such change.

Recommendation 20: Airservices should produce a proposal assessment for each change that provides a comprehensible outline of any change proposal, including the pros and cons, key considerations, the conclusion and the final decision Airservices has made. Relevant material that underpins the decisions should also be published for those seeking greater detail.

Recommendation 21: Airservices should ensure its Environmental Assessments for changes in air traffic arrangements reflect a thorough and transparent analysis of all key issues relevant to aircraft noise impacts, and specifically reflecting the key issues and concerns of communities.

Recommendation 22: Airservices should tailor its public announcements about aircraft noise management to address the specific concerns and expectations of affected communities, as identified in consultation forums and aircraft noise complaints.

Recommendation 23: As far as practical, Airservices should make direct contact with community leaders prior to public announcements about issues that affect the community to help ensure that consistent information is passed on to residents.

Recommendation 24: Airservices should not pursue the noise-respite trial as proposed in March 2015, even as a short term trial measure, and instead should put out clear information as to the inequitable consequences that would necessarily flow in terms of night-time respite.

Recommendation 25: Airservices should set out the rationale behind the preferred runways and smart tracking changes implemented in Perth, including identifying the anticipated impacts in terms of aircraft movements and aircraft noise consequences, well ahead of the planned post-implementation review of these changes.

Airservices Australia's Management Response to the ANO Report – “Investigation into Complaints about the Perth Noise Improvement Proposals (November 2015)”

The ANO report highlights four key areas for improvement that management will focus on for improvement:

1. The relationship and information flow between the ANO and Airservices
2. Decision making relating to 'noise improvement' change proposals
3. Principles for preparing and presenting information to stakeholders
4. Specific issues relating to the completion of the Perth noise improvement proposals

Opportunities for improvement in many cases align with initiatives that had been identified by internal reviews and in some cases are already underway.

In summary, Airservices actions against the four key areas is outlined below.

1. Re-establishing the relationship between the ANO Office and Airservices

- A new relationship manager has been assigned responsibility for the day to day interface with the ANO's Office to ensure that the ANO is supported with high quality and timely information necessary to undertake his role.
- A workshop is proposed between Airservices and the ANO and his office in January/February 2016 to ensure a common understanding is reached on the expectations/requirements on both sides.
- A program of senior level engagement and clear escalation paths for resolving any issues that may arise from time to time is also being developed.

2. Re-defining Airservices internal processes and accountabilities for 'noise improvement' change proposals

- The internal Airservices procedure for “Identifying Noise Improvement Opportunities for Air Traffic Control and Environmental Assessment” is being updated to better define the responsibilities and accountabilities for how change proposals will be identified, assessed, communicated and implemented.
- The key changes will be to more clearly define the shared organisational accountabilities including: stakeholder engagement and communication (Corporate & Industry Affairs); environmental assessment (Safety, Environment and Assurance); and operational assessment and implementation (Air Traffic Control).
- A further significant change will be to more clearly define the environmental analysis steps that need to be taken as change proposals are developed to ensure that the appropriate level of rigour is applied to proposals discussed with the community.

3. Updating Airservices "Communications and Consultation Protocol" to include a number of key principles for community and stakeholder engagement

- A number of recommendations from the ANO relate to principles that should be applied to how information is analysed, presented and communicated to communities and other stakeholders. Many similar issues have also been identified internally as areas for potential improvement.
- The published "Communications and Consultation Protocol" will be updated, in consultation with the ANO, to ensure that these principles are clearly communicated and then applied to any future communication with stakeholders about change

4. Updating information relating to the Perth noise improvement proposals including the Terms of Reference for a Post Implementation Review

- A number of specific recommendations relating to information that has been presented or is currently in published material relating to the Perth noise improvement proposals will be actioned immediately.
- All recommendations that relate to the conduct of a Post Implementation Review (PIR) will be addressed through the development of a Terms of Reference for the PIR. The Terms of Reference will be consulted with the ANO to ensure that it captures the areas of concern and published for the information of interested stakeholders.

Airservices management will provide a formal report to the Board and ANO in June 2016 (6 months) to update on how these actions have been implemented. Regular updates will also be provided informally to the ANO.