



Quarterly Report  
July – September 2017

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## 1 Introduction

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- 1.1 This report includes complaint statistics and a summary of ANO activities during the July to September 2017 quarter. It is structured around the three key functions of the ANO, these being the review and monitoring of Airservices Australia's and the Department of Defence's:
- a. complaint handling;
  - b. community consultation processes; and
  - c. provision of information about aircraft noise.

## 2 Overview

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- 2.1 During the quarter, the ANO team travelled widely to attend community consultation group meetings at various airports and also in the course of investigating potential noise improvement opportunities arising from complaints relating to both Defence's and Airservices' aircraft noise management. This also included delivering complaint management training at several Defence bases.
- 2.2 From the start of July to the end of September, the ANO received a total of 14 complaints, including two about Defence's management of aircraft noise issues. This is half the average of 28.2 complaints received per quarter over the 2016/17 financial year. However, with ten complaints already received in the first two weeks of October, it is not likely this unusually low rate will be sustained.
- 2.3 The ANO's *Review of Defence's Aircraft Noise Complaints Management System*, submitted to Defence in November 2016, made seven recommendations, all of which were accepted by Defence. Defence has advised that it continues to action these recommendations. The ANO looks forward to being provided with evidence of actions taken that will support closure of some of these recommendations in the coming period. **Attachment 2** provides a summary of progress against all outstanding recommendations.
- 2.4 During the quarter, Airservices provided the ANO with a draft copy of its *Air Navigation Services Community Engagement Plan*. The ANO has provided extensive written comments to Airservices on this draft document and has begun discussions with Airservices about practical community engagement and the next steps to be taken by Airservices.. With forecasts for continued growth in aviation activity prompting a number of significant infrastructure changes at various airports in the short to medium term, it is essential that Airservices' community engagement strategy is designed to ensure aircraft noise issues are managed effectively through this upcoming period of change.

### 3 Complaint handling

- 3.1 During the quarter the ANO received 14 new complaints, two of which related to Defence's aircraft noise management. This is an unusually low number of complaints received for a quarter, with only one other quarter having had as few –April to June 2013 period. In 2016/17, the average number of complaints received was 28.2 per quarter (or 9.4 per month) over the 2016/17 financial year. However, with ten complaints already received in the first two weeks of October, it is not likely that this low rate will be sustained.
- 3.2 At the end of the quarter, eleven complaints remained open. Fifteen complaints were closed in the quarter, with ten having been reviewed in detail and five referred back to the relevant agency for a direct response.
- 3.3 Complaint statistics for the quarter are summarised at **Attachment 1**.

#### Seeking noise improvement opportunities

- 3.4 In addition to reviewing Airservices' or Defence's handling of an aircraft noise issues, the ANO investigates complaints with an eye for any potential opportunities to improve noise outcomes. Generally, the practical opportunities for change arising from complaints received by the ANO are limited. This is due to it commonly being the case that there are no feasible, practical and safe alternatives available. In addition, Airservices and Defence may have already identified and implemented the available change opportunities. Nonetheless, there are times when the unique and independent perspective of the ANO delivers the high and wide view of the range of interests, imperatives and concerns necessary to identify a new noise improvement opportunity.
- 3.5 Table 1 (below) reports on the noise improvement opportunities that the ANO continues to pursue with Airservices and Defence.

Table 1: Noise improvement opportunities

| Complaint received by ANO | Description of initiative   | Current status   |
|---------------------------|---|--|
| Mar 2016                  | Sydney: adjustment to flight paths over water during curfew hours | The ANO asked Airservices to consider if a better noise outcome can be achieved for coastal residents south of Sydney Airport affected by flights departing during the curfew. Following ANO analysis and feedback, Airservices re-visited its initial investigation into the feasibility of changing the standard instrument departure. Airservices has now undertaken the formal change process, including detailed procedure design, necessary assessments and relevant consultation. The ANO is pleased that a change will be introduced next month to move the curfew departure path further out to sea, reducing the noise experienced by potentially thousands of coastal Sydney residents from these night-time flights. |

*Continued on next page*

| Complaint received by ANO | Description of initiative   | Current status   |
|---------------------------|---|--|
| Nov 2016                  | Pallarenda: ATC procedure changes to reduce overflight of residential areas                   | <p>The ANO is pursuing with Defence a possible noise improvement for residences in the Pallarenda area north of RAAF Base Townsville. The ANO asked Defence to give detailed consideration to options to reduce the number of aircraft overflights by both civilian and military aircraft departing Townsville Airport to the north.</p> <p>In early July, the ANO team visited Townsville to progress this matter with Defence. A number of potential changes have been identified that could reduce the noise impacts for Pallarenda residents. Defence has advised that, procedures for flights from Townsville to Palm Island have been amended, delaying their turn to reduce overflight of the Pallarenda community. Defence is also continuing to explore the feasibility of two other potential opportunities to further reduce noise impacts for residents.</p> |
| Feb 2017                  | Brisbane: adjustment to arrival flight path to reduce overflight of residential areas         | <p>Following a suggestion from a resident of Clear Mountain (north of Brisbane Airport), the ANO asked Airservices to give consideration to a possible noise improvement. The suggestion was to move one of the Standard Terminal Arrival Routes further west. This would potentially result in a significant reduction in the number of residential areas overflown.</p> <p>Airservices did a preliminary investigation and advised the ANO that the proposal is not feasible at this time. The ANO is satisfied that it would not be practical for Airservices to introduce a flight path change at Brisbane ahead of the major redesign work for the new runway, which is already well-advanced.</p>  |
| May 2017                  | Point Cook: flying orders amendment   | <p>In response to complaints received about a military exercise, Defence is investigating the opportunity to change flying orders at RAAF Base Williams in Point Cook to encourage helicopters to operate over less noise sensitive areas.</p>   |
| May 2017                  | Hobart: relocation of flying training area  | <p>Airservices considered a proposal to relocate General Aviation training activities to an alternative area to reduce impacts for residents near to the existing area. The investigation identified that it is not operationally feasible to move the training area further south (near Betsey Island) as originally proposed and that no further action would be taken.</p>  |
| June 2017                 | Perth: changes to northern smart tracking approach path to reduce noise impacts for residents | <p>This suggestion was first raised by residents prior to the new path being introduced in Sept 2015. At the time Airservices advised that the 12-month trial would be conducted with the path as designed and consideration of options to change the path would be part of the Post Implementation Review (PIR) process. The PIR report noted that “the Perth Aircraft Noise Technical Working Group will consider the input from...residents when reviewing the use and design of Smart Tracking during 2017”. The ANO understands that Airservices has developed a potential alternative approach path and will be consulting with relevant industry stakeholders ahead of possible community consultation later this year.</p>   |

### Seeking improvements in aircraft noise complaint handling

- 3.6 The ANO has facilitated complaints management workshops at several Defence bases during the quarter, to help foster effective complaint handling.
- 3.7 Defence is also working to progress actions in response to the recommendations made in the ANO’s *Review of Defence’s Aircraft Noise Complaints Management System (November 2016)*. None are closed as yet.

## 4 Consultation

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4.1 The ANO office attended a number of industry and community consultative meetings during the quarter. This activity supports the ANO's role of monitoring Airservices' and Defence's consultation and information provision. It also fosters a broader understanding and awareness of aircraft noise management issues.

Meetings attended included:

- Townsville Community Aviation Consultation Group, Defence, Airport management, local operator, local MP and community member meetings;
- Government Aviation Complaint Handlers Forum, hosted by Defence;
- Gold Coast Community Aviation Consultation Group, Airport and community member meetings;
- Darwin Planning Coordination Forum, Community Aviation Consultation Group and community member meetings;
- Government Aviation Noise and Environment Strategy Group meeting;
- Archerfield Community Aviation Consultation Group meeting;
- Amberley RAAF Base visit;
- Brisbane Airport New Parallel Runway briefing;
- Melbourne Noise Abatement Committee meeting;
- Society of Consumer Affairs Professionals Symposium in Sydney;
- Conducted complaint management training at RAAF Base Townsville, RAAF Base Amberley and RAAF Base Darwin;
- Presented at Moorabbin Community Aviation Consultation Group meeting.

4.2 During the quarter, Airservices provided the ANO with a draft copy of its *Air Navigation Services Community Engagement Plan*. The ANO has provided extensive written comments to Airservices on this draft document and has begun discussions with Airservices about practical community engagement and the next steps to be taken by Airservices.

4.3 The ANO is pleased that relevant Airservices officers and staff will soon receive training in community engagement from the highly respected International Association for Public Participation. This recognition of the importance of skilled and strategic community engagement design and practice will help to meet the challenges ahead.

4.4 In the past two weeks, the ANO has received six complaints about a flight path change introduced at Hobart in mid-September. The complaints express concern about a lack of consultation with the communities affected by the changes, and about the unexpected increase in aircraft overflights and the associated aircraft noise (and other) impacts. The ANO is in the early stages of investigating this emerging issue. The ANO understands that, at this stage, Airservices' Noise Complaints and Information Service has received 30 complaints about this flight path change.

- 4.5 The ANO also investigated a complaint about inadequate consultation with landowners affected by the Talisman Sabre exercise run by Defence during the past quarter. While it was noted that Defence were unable to provide specific information relating to landowner consultation, there was evidence to support the claim that there had been a degree of broader community consultation. As public consultation is never a perfect science, and given a lack of clear evidence either way, the ANO was unable to determine whether the consultation was adequate or reasonable in the circumstances. Notwithstanding this inconclusive outcome, Defence has now established a more rigorous consultation mechanism by way of an email distribution list for future exercises. The case has therefore been closed and recorded as 'improvement implemented by Defence'.

## 5 Information Provision

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- 5.1 The ANO was pleased to see the launch by Airservices during the quarter of online information portals for general aviation airports. These websites provide the public with access to more information about aircraft operations, noise modelling, complaint statistics and general airport information for these locations.

## 6 Closing remarks

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- 6.1 In my last quarterly report, I stressed the importance of effective community engagement:

“At the close of my second quarter as ANO I am pleased to report a number of positive developments in Airservices’ and Defence’s management of aircraft noise. Conversely, the potential for missed opportunities and backward steps is also apparent. At a time of significant development in aviation and aviation infrastructure, particularly in the Asia region, community consultation and effective community engagement have never been more important. The messages given now to the community by Airservices and by Defence will set the tone for the demanding and fast moving times ahead.

It is particularly important, at this time of significant expansion, that Airservices’ and Defence’s ongoing conversation with the community is forthright, constructive, informative and receptive. It should be supported by careful planning and transparent strategies, implemented with an eye to sustaining the continuing conversation.

It is trite to say that aviation’s continued expansion depends on society’s continued acceptance and approval. It is likely that approval will be tested in the near future. A platform of quality engagement with the community, supported by well developed strategies will do much to ensure that Airservices and Defence are positioned to contribute to aviation’s expansion in a way that best balances the impacts and benefits across the Australian community.”

6.2 Progress in this area has been slow, but I am pleased that some steps are being taken. The recent complaints concerning the new flight paths at Hobart underline the need for substantial further work and for that work to progress swiftly. Similarly, Defence has identified room for improvement in its consultation practices arising from a complaint investigated by the ANO about this year's Talisman Sabre exercise. These complaints may also prove useful case studies from which valuable lessons may be learned by Airservices and Defence. They may present opportunities for more concrete and practical progress to be made.

6.3 I remain focused on this important aspect of my Charter.



Narelle Bell  
Aircraft Noise Ombudsman  
17 October 2017

## Attachment 1 Complaint Statistics

The following tables summarise the complaint statistics for the quarter.

| <b>AIRSERVICES</b>                              | <b>Jul 2017</b> | <b>Aug 2017</b> | <b>Sep 2017</b> | <b>Total for quarter</b> |
|---|-----------------|-----------------|-----------------|--------------------------|
| Complaints received:                            | 6               | 1               | 5               | <b>12</b>                |
| Complaints closed:                              | 5               | 5               | 3               | <b>13</b>                |
| <b>Total complaints closed - not reviewed:</b>  | <b>1</b>        | <b>1</b>        | <b>1</b>        | <b>3</b>                 |
| Complainant did not provide further information | 1               | 0               | 0               | <b>1</b>                 |
| Outside charter scope                           | 0               | 0               | 0               | <b>0</b>                 |
| Referred to Airservices to respond directly     | 0               | 1               | 1               | <b>2</b>                 |
| <b>Total complaints closed - reviewed:</b>      | <b>4</b>        | <b>4</b>        | <b>2</b>        | <b>10</b>                |
| No change possible - explanation provided       | 4               | 3               | 2               | <b>9</b>                 |
| Change adopted by Airservices Australia         | 0               | 1               | 0               | <b>1</b>                 |
| Change adopted by Airport operator              | 0               | 0               | 0               | <b>0</b>                 |
| Change adopted by Aircraft operator             | 0               | 0               | 0               | <b>0</b>                 |

| <b>DEFENCE</b>                                  | <b>Jul 2017</b> | <b>Aug 2017</b> | <b>Sep 2017</b> | <b>Total for quarter</b> |
|---|-----------------|-----------------|-----------------|--------------------------|
| Complaints received:                            | 1               | 1               | 0               | <b>2</b>                 |
| Complaints closed:                              | 1               | 1               | 0               | <b>2</b>                 |
| <b>Total complaints closed - not reviewed:</b>  | <b>1</b>        | <b>1</b>        | <b>0</b>        | <b>2</b>                 |
| Complainant did not provide further information | 0               | 0               | 0               | <b>0</b>                 |
| Outside charter scope                           | 0               | 0               | 0               | <b>0</b>                 |
| Referred to Defence to respond directly         | 1               | 1               | 0               | <b>2</b>                 |
| <b>Total complaints closed - reviewed:</b>      | <b>0</b>        | <b>0</b>        | <b>0</b>        | <b>0</b>                 |
| No change possible - explanation provided       | 0               | 0               | 0               | <b>0</b>                 |
| Change adopted by Defence                       | 0               | 0               | 0               | <b>0</b>                 |

|                                      | <b>Airservices</b> | <b>Defence</b> | <b>Total</b> |
|--------------------------------------|--------------------|----------------|--------------|
| Complaints carried forward on 1 July | 9                  | 3              | <b>12</b>    |
| Complaints received                  | 12                 | 2              | <b>14</b>    |
| Complaints closed                    | 13                 | 2              | <b>15</b>    |
| Complaints open at 1 October         | 8                  | 3              | <b>11</b>    |

## Attachment 2 Outstanding ANO recommendations

The following table sets out the status of outstanding recommendations made by the ANO and the ANO's assessment of action against each. Recommendations that were previously reported as complete have been removed.

### Defence Complaints System Review (November 2016)

| Ongoing recommendations  | ANO assessment of agency response  |
|--|--|
| <b>Recommendation 1</b> – Defence should expand the focus of complaint investigation beyond compliance checking to also identify and pursue opportunities for noise improvements, improved community engagement and better public information.   | <u>Ongoing</u> – Defence has advised that work is underway to amend its internal complaint processes to incorporate the recommended improvements.  |
| <b>Recommendation 2</b> – To help in managing complainant expectations, Defence should improve the public information about the complaints process to address the information requirements outlined in the Standard and as identified within the report.   | <u>Ongoing</u> – Defence has advised that the Standard has been reviewed and public information about the complaints process is expected to be published next quarter.                           |
| <b>Recommendation 3</b> – Defence should review the Defence Aircraft Noise web information and, taking account of comments in this report, make improvements to information provision, presentation and functionality.   | <u>Ongoing</u> – Defence has advised that it has made some changes already, including launching its online complaint form. Plans for a broader refresh are underway.                             |
| <b>Recommendation 4</b> – To support the timely release of written responses, Defence should: <ul style="list-style-type: none"> <li>a. document the procedures to be followed in the event of written complaints (whether received through post, email or an online form), ensuring such procedures incorporate a timely acknowledgement of the complaint</li> <li>b. streamline any necessary review and approval processes for written responses to complaints</li> <li>c. consider the provision of training and support material for staff that will be responding to complaints, in particular via email following the introduction of electronic complaint submission.</li> </ul> | <u>Ongoing</u> – Defence has advised that process review and refinement is underway.   |
| <b>Recommendation 5</b> – Defence should adhere to its existing requirements for complaint recording and tracking.   | <u>Ongoing</u> – Defence has advised that work is underway to amend its internal complaint processes to incorporate the recommended improvements and improve adherence to existing requirements. |

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| Ongoing recommendations  | ANO assessment of agency response  |
|--|--|
| <p><b>Recommendation 6</b> – Defence should update its localised recording systems and the OA39 form as appropriate to incorporate:</p> <ul style="list-style-type: none"> <li>a. Closing date</li> <li>b. A place to record consideration of noise improvement opportunities, community engagement improvements and public information improvements</li> <li>c. Undertakings or follow up action required (including who is accountable for delivery).</li> <li>d. A mechanism for tracking any undertakings or follow up actions through to completion.</li> </ul> | <p><u>Ongoing</u> – Defence has advised that work is underway to amend its internal complaint processes to incorporate the recommended improvements.</p>               |
| <p><b>Recommendation 7</b> – Defence should:</p> <ul style="list-style-type: none"> <li>a. ensure that complaints not readily ascribed to a base are managed as effectively as other complaints</li> <li>b. share data, experience and learnings across bases to maximise noise improvement opportunities and enhance complaint management across Defence.</li> </ul>  | <p><u>Ongoing</u> – Defence has advised that initial consideration has been given to how to address this recommendation, with more detailed plans to be developed.</p> |