AIRSERVICES RESPONSE

Flight Path Forum Submission "It's all about the How"

12 October 2020

Introduction

Flight Path Forum (FPF) presented to Airservices a submission titled "It's all about the How" at the first community meeting held for the Sunshine Coast Airport new flight paths Post Implementation Review (PIR) on 19 September 2020. This document provides a response to the 46 questions posed in the submission. The questions being responded to are paraphrased in italics prior to each response for ease of interpretation.

In providing this response, it is noted that this submission was prepared prior to the community meeting and that many of these questions were responded to during the meeting. The discussion around some of these questions is also reflected in the updated draft Terms of Reference (TOR) that is now available for public comment.

Stakeholder Reference Group

Preamble: Request to form a Stakeholder Reference Group with an independent Chair to provide a properly structured and formalised process for engagement.

Airservices confirmed at the community meeting on 19 September 2020, that it would not establish a Stakeholder Reference Group, but that if the community chose to establish such a group that we would engage productively with its members while continuing to engage with the broader community.

A Community Engagement Plan based on our Community Engagement Framework (CEF) and the PIR Principles agreed to with the community, will be applied to provide a properly structured and formalised process for information sharing and engagement.

Question 1 – Reference made to a document titled "Review into processes associated with aircraft noise management" and content noting community/noise representatives should be placed on a Change Team. Which representatives will be representing the community on the 'change team'?

The document is referencing an internal Airservices process. The review identified the need for Airservices community and noise specialists to be on the Change Team, which manages a flight path change proposal, from the design phase to provide early input. The review was not suggesting community members be placed on the change team, but rather was referencing internal Airservices roles and activity.

Stakeholder Prioritisation

Preamble: Request for Airservices share its stakeholder prioritisation statement.

Airservices does not have a stakeholder prioritisation statement. The PIR TOR (currently subject to public comment) provides information on stakeholders (section 9) to be engaged and the Principles (section 7) to be applied to engagement for the PIR.

Level of Influence

Question 2 – Define the community's role in the PIR and the International Association of Public Participation (IAP2) Spectrum level of engagement to be applied?

The TOR address the application of the IAP2 Spectrum under Principles (section 7).

Question 3 – How will community inputs be considered and at what point?

The Community Engagement Plan (CEP), to be developed in consultation with the community, will define the process for considering community inputs and the timing of this.

Community Engagement

Question 4 – Does Airservices recognise the ANO recommendation in relation to genuine opportunities for community contributions? The questions references that documents core to the first community meeting were not be provided ahead of this and that only one week was allowed to comment of the TOR.

Airservices intends to implement a PIR that provides genuine opportunity for community contributions to influence decisions.

As noted at the community meeting, the draft TOR was only completed the day prior to the meeting, due to the desire to appropriately consider a number of community submissions on TOR content made prior to the meeting. In response to the request at the community meeting, four weeks has been provided for comment on the TOR.

Question 5 – Request to include a commitment in the TOR that information will be provided ahead of time for ample consideration.

This commitment has been included in the TOR Principles (section 7).

Question 6 – Reference made to the original invitation list for the community meeting not including groups listed as members of FPF. How will Airservices conduct its stakeholder identifications process to ensure participation of those most affected?

In an effort to ensure balanced representation at the first meeting, the initial invitation list included FPF as the representative of a number of local community groups, as stated on the FPF website and based on interpretation of correspondence received from member groups and individual community members noting this representation. Following requests to expand the invitation list to include FPF member groups, further invitations were distributed.

We will continue to promote the PIR and engagement activity on *Engage Airservices*, through local Councils, the Sunshine Coast Airport Community Aviation Forum (CAF) and through the various community groups who attended the first community meeting. We plan to engage widely, rather than narrowing engagement to a select group of community representatives, to ensure we capture the views of all community members with an interest in this PIR.

Question 7 – Reference to the "Strategic Stakeholder Group" in the 2017 review, questioning who constitutes this group.

The Strategic Stakeholder Group is the name of a former Airservices branch that is no longer in existence.

Question 8 – Is this another example of consultation in name only? What standards will Airservices be held accountable to for this engagement?

Airservices will apply our CEF to the PIR engagement. The TOR Principles (section 7) also provide agreed commitments we can be measured against.

Question 9 – How will Airservices demonstrate application of National Operating Standard (NOS) for Environmental Management of Changes to Aircraft Operations which states the need to consider the social, economic and cultural context of the communities being consulted to ensure accessibility to information?

The NOS applies to flight path change projects. If a community suggested alternative is identified as feasible, the change will be delivered in accordance with the NOS and also the Flight Path Design Principles (FPDP), which came into effect from 1 October 2020.

Question 10 – What is Airservices view on the value of community engagement for the PIR?

Airservices conducts PIRs to capture learnings, and where appropriate, identify improvements. The community will add value to this PIR by suggesting alternatives to improve noise outcomes. In addition, feedback on the information we provide on aircraft operations and noise impacts will assist us to improve the way we communicate this complex information.

Transparency

Question 11 – Why was the draft TOR withheld until the community meeting?

See response to Question 4.

Question 12 – How will the possible increase in operational complexity be reconciled with minimising impacts on the environment, and in particular noise?

The FPDP provide a framework for considering the various, and sometimes competing, elements of flight path design. If a community suggested alternative is identified as feasible, it will be designed in accordance with the FPDP.

The FPDPs note safety is our most important consideration and that all flight paths must be compliant with relevant rules. All other Principles are considered equally in the flight path change process, noting that not all Principles apply to each flight path change.

Question 13 – How will Airservices balance tensions in relation to differing stakeholder needs and interests?

See response to Question 12.

Question 14 – How committed is Airservices to find the least impact flight path solutions for Sunshine Coast residents?

Airservices is committed to engaging genuinely with the community, particularly in relation to community suggested alternatives.

Compliance

Question 15 – Request for a response on how each step of the NOS will be applied to the PIR.

The NOS applies to the management flight path changes, and while it notes the need to conduct a PIR, it does not provide a step by step process, so PIRs can be developed according to the specific needs of each implemented flight path change. If a community suggested alternative is identified as feasible, Airservices processes (including the application of the NOS) would apply to the delivery of the flight path change. The application of the NOS process can be discussed with the community at this time.

Question 16 – Request for information on application of specific elements of the NOS.

See response to Question 15.

Question 17 – How will the FPDP be applied to the PIR?

If a community suggested alternative is identified as feasible, the FPDP will be applied to design of the change.

Question 18 – How will the FPDP be weighted for the PIR?

The FPDP apply to the design of flight paths. If a community suggested alternative is identified as feasible, the Safety and Compliance principles will be applied as the highest priority. All other Principles are considered equally in the flight path change process, noting that not all Principles apply to each flight path change.

Question 19 – Airservices risk management standard applied a "medium environmental risk" rating to this change. What constitutes this rating and how will it be mitigated?

The risk classification is an internal measure used to assess implementation requirements for a flight path change. It was determined at a point in time to support environmental impact assessment requirements and inform the process applied.

A PIR revisits the assumptions that were used to determine the risk classification for internal learning purposes.

Roles and Accountability

Question 20 – How will Airservices monitor light plane and helicopter activity?

Airservices responds to noise complaints through our Noise Complaints and Information Service (NCIS) who provide data on the operation of aircraft. The TOR PIR Process and Scope (section 6) notes that operation of these aircraft outside controlled airspace (and tower hours) is not within the scope of the PIR, however we will seek to provide information on their operations as appropriate.

Question 21 – Who is responsible for the impacts arising for aircraft operating on flight paths that effect the natural environment?

Flight path changes are environmentally assessed in accordance with *Environmental Protection and Biodiversity Conservation Act (EPBC Act)* requirements and are referred to the Commonwealth Minister for the Environment where impacts are deemed "significant" against the Act.

Question 22 – Reference to the Commitment to Aircraft Noise Management, and mapping approach and departure routes over the same areas.

The FPDPs supersede the *Commitment to Aircraft Noise Management* and include a range of considerations of equal weighting when designing flight path changes.

Post Implementation Review Process Design

Question 23 – How will Airservices demonstrate genuine opportunities for the community to influence decisions made through the PIR?

The TOR and CEP will be developed in consultation with the community, and these will guide community involvement. The TOR PIR Process and Scope (section 6) provides details of planned reporting to demonstrate transparency, and the Principles (section 9) provide commitments to support this.

Question 24 – Provide criteria against which community suggested alternatives will be considered.

The criteria used to assess community suggested alternatives is provided in the TOR Consideration of Community Suggested Alternatives (section 8).

Question 25 – What is the PIR timeframe?

The PIR timeframe is being developed in consultation with the community. The timeframe required for the community to put forward alternatives is being considered during the public review of the TOR and will also be included in CEP consultation.

The PIR Process and Scope (section 6) anticipates phase two of the PIR (actual aircraft movement and noise monitoring) may occur within 18 months but this is subject to COVID-19 impacts and the ability to gain representative aircraft operation data. We will continue to engage with the community on this timing.

Question 26 – Are there standard processes for a PIR?

The TOR PIR Process Overview (section 3) provides information on the standard PIR process.

Question 27 – Are there processes for a particular type of change that complement the standard process?

The standard process and methodology applies, regardless of the change.

Operational Issues

Question 28 – How will the review investigate and determine actions to address and manage the problem of General Aviation impacts?

The TOR PIR Process and Scope (section 6) notes that General Aviation operations during tower hours will be reviewed as part of the PIR. General Aviation operations outside of tower hours do not form part of the PIR scope, but information will be provided on these operations where possible.

Question 29 – How will Preferred Runway Use be addressed?

The TOR PIR Process and Scope (section 6) notes that Noise Abatement Procedures (NAPs) will be reviewed as part of the PIR. NAPs including preferred runway use.

Question 30 – Will the option of a curfew be examined through the PIR?

Curfew options are not part of the scope of this PIR. Implementation of curfews is not part of Airservices function.

Question 31 – How will the PIR consider and evaluate the role of air traffic management in managing impacts on the community?

The TOR PIR Process and Scope (section 6) includes review of air traffic management as part of the PIR.

Question 32 – How will the review evaluate noise complaints data since implementation of the new flight paths?

Airservices PIRs include a review of community complaints received to inform noise monitoring and modelling activity and to support engagement activity. This will be included in PIR reporting.

Question 33 – How will the review consider the extent to which NAPs can be enhanced, complied with and enforced?

The TOR PIR Process Overview (section 6) includes a review of compliance with and opportunities to enhance the NAPs. Airservices has no regulatory power to enforce NAPs, but where it is found they are not being applied feedback will be sought from industry to determine the reasons behind this.

Project Team Structure

Question 34 – What is the PIR project team structure?

The TOR identifies stakeholders (section 9) and Airservices roles (section 10) in the PIR.

Section 9 identifies relevant agencies and their relevance to the PIR.

Section 10 identifies the Airservices roles involved in the PIR. The Environment and Community Manager will lead and manage the PIR as the accountable Airservices manager.

Airservices CEF, FPDP and NOS will apply as the core administrative tools for this PIR. These tools support the acquittal of our obligations under the *Airservices Act 1995*.

The NOS will apply to any community suggested alternative that is identified as feasible, including assessment against *EPBC Act* criteria which may require referral to the Commonwealth Minister for Environment.

Assessment

Question 35 – Reference to Airservices Communications and Consultation Protocol and assessment of flight path modifications.

The CEF supersedes the *Communication and Consultation Protocol*.

The TOR PIR includes investigation of community suggested alternatives. Section 8 of the TOR explains how these alternatives are assessed, including consideration of communities overflown by the proposed alternative.

Question 36 – How will the PIR assist residents affected by noise levels higher than previously advised?

Phase two of the PIR will include noise monitoring and desktop modelling based on actual aircraft movements to determine if the noise levels forecast in the environmental assessment, and subsequently communicated, are consistent with what has been experienced post implementation. This information will be included in reporting and opportunities to improve noise outcomes investigated.

Question 37 – Airservices Targeted Environmental Impact Assessment (TEIA) noted it was not likely that a significant impact on health, safety, welfare or quality of life would result from the flight path change. How will the review consider this?

In considering the impact of proposed flight path changes on communities, the *EPBC Act* applies. Impacts deemed to be "significant" against the EPBC criteria are referred to the Commonwealth Minister for the Environment for advice. Health, safety, welfare and quality of life as assessed as part of this process.

A review of these matters is outside the scope of this PIR.

Question 38 – How will the PIR consider the impacts of the implementation of the new flight paths on National Parks, wetlands and environmental reserves to the north of the airport?

This is outside the scope of the PIR.

As noted at the community meeting, this PIR will not reinterrogate the flight path design decision-making process. Instead it will consider community suggested alternatives, assess actual aircraft operations and take learnings to improve our processes and communication.

Question 39 – What noise monitoring and assessments will be undertaken as part of the PIR?

Phase two of the PIR will include noise monitoring and desktop modelling based on actual aircraft movement to determine actual noise levels experienced and compare these to the noise levels forecast through the environmental assessment.

Question 40 – Will noise monitoring be undertaken in National Parks, wetlands and environmental reserves?

The location of noise monitors will be determined during the PIR in consultation with the community.

Question 41 – Did Airservices undertake any baseline noise monitoring prior to opening of the new runway?

Baseline noise monitoring was not part of the scope of Airservices TEIA.

Question 42 – How will the social impact, health and well-being of communities to the north of the airport be considered in the PIR?

A review of these issues is outside the scope of this PIR.

Reporting

Question 43 – How will Airservices report feedback outcomes to the community?

The TOR PIR Process and Scope (section 6) provides details of proposed reporting of PIR feedback and outcomes.

Question 44 – How will the community know its views have been taken into account?

The TOR Objectives (section 4), PIR Process and Scope (section 6), Principles (section 7) and Consideration of Community Suggested Alternatives (section 8) provide information on how community views will be considered, assessed and reported.

Resourcing

Question 45 – How will Airservices provide timely responses to community inputs?

Airservices will use our *Engage Airservices* platform as our primary means of response to community inputs, as opposed to responding individually to each submission received. This will ensure all community members have access to the same information and will allow us to refer to previous responses where inputs duplicate each other.

Where the volume of feedback exceeds our capacity to provide response via *Engage Airservices* promptly, we will provide an update noting this.

Where individual responses are warranted or individual response is requested, we will provide this. The timeframe for these responses will be communicated in acknowledgement of the submission to manage response time expectations.

Limitations

Question 46 – How will the review take into account the impacts of COVID-19?

The TOR includes a two phased approach. During the first phase, information will be provided on actual (COVID-19 impacted) aircraft movements for community information to support informed involvement in the PIR, including consideration of community suggested alternatives. The second phase will be conducted when aircraft movements return to an appropriately representative level. The timing of this phase will be discussed with the community as we emerge from the COVID-19 impacts.