



# Blue Mountains Conservation Society Inc

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**Nature Conservation Saves for Tomorrow**

6/7/2020

## **To: Air Services Australia - Comments on Final Flight Path Principles**

The Blue Mountains Conservation Society (the Society) is a community-based volunteer conservation organisation with over 800 members. It is the oldest continuing environmental organisation in the Blue Mountains. The goal of the Society is to help conserve the natural environment of the Greater Blue Mountains.

The Society submitted a response to the Draft Flightpath Principles in February 2020. The Society now wishes to follow up the first submission by submitting the following comments on the Final Path Principles and the supporting documentation in particular the Application notes for the Flight Path Design Principles (FPDP).

The Societies concerns are largely regarding the impact of flight paths on the Blue Mountains National Park, Greater Blue Mountains World Heritage Area, designated Wilderness Areas in the Park and other natural areas within the Greater Blue Mountains region.

The Society also has concerns with how the original community consultation was conducted. There was little public engagement in the Blue Mountains area and the initial time for comment was also very restricted. This is particularly concerning as Western Sydney and the Blue Mountains will be subject to much greater aircraft traffic in the next decade.

The Society acknowledges that industry stakeholders are important in the review process but the number of these stakeholders who were consulted and made contributions to the review process results in a swamping of community submissions. This is an unfortunate result of the process and does not allow community concerns regarding noise and environmental impacts to be measured accurately.

**Comments on Flight Path Design Principles (FPDP) Draft by Air  
Services Australia (ASA)  
July 2020**

**The summary sheet of Flight Path Design Principles as the primary document available to the public, the document needs to be user friendly providing concise information and reference to the FPDP Application notes as this is the first point of access for members of the public.**

**Principle Type “Safety and compliance principles”**

**Principle “Safety of air navigation must be the most important consideration”.**

ASA legislatively must regard air safety as the most important consideration however this obligation should be seen more broadly. This principle does not accurately summarise the Application notes (“Overview” p.11) attached to this summary document. It neglects to refer to the community who are included in the statement: -

**“The safety of air navigation ensures the safety and protection of aircraft passengers **and communities under the flight paths.**”**

This umbrella statement should therefore mention the community and be changed to reflect community safety inclusion, not just industry safety.

*e.g. “Safety of air navigation, the community and the environment must be the most important considerations”*

This statement would include exercising powers and functions that include community safety and the environment when considering flight path design.

In the frequently asked questions this concern of the Society is addressed by suggesting that the other organisations that deal with air safety such as CASA provide for sufficient protection of community safety. The inclusion of the community in this principle is an improvement on the current principle and reflects public responses during the consultation period.

**Principle Type: “Noise and Community Principles”**

**Principle:**

**“Consider concentrating aircraft operations to avoid defined noise sensitive areas.”**

**Overview** “The list of noise sensitive sites” (Application Principles p15)  
This could reflect the ASA 1995 obligation referred to in the first sentence of the overview **“an obligation to provide environmentally responsible services by**

**minimising impact of aircraft operations, including the impact of aircraft noise”**  
better by adding the following to the list of sites: -

***Public recreational places***

**Application:** Statement from the first sentence:

**Navigational aids concentrate large numbers of flights through a narrow flight path over residential areas and actually increase resident’s exposure to aircraft noise.**  
The application of **“the impact of aircraft operations on noise sensitive sites up to 60 kilometres from a runway *or a regional navigational aid*”** should include runways and ***“regional Navigational Aids and helipads”*** where they are located within residential areas.

**Principle:**

**“Consider potential impacts on social, economic and cultural values of community and locations including indigenous and other heritage places.”** (p17)

**Overview,** second paragraph:

Add the impact of concentrating aircraft caused by ***navigational aids and helipads*** to the locations considered for the impact of aircraft operations on communities.

**Overview:** Sixth paragraph.

The list of locations of national environmental significance sources should also include ***World Heritage Areas register***

**Overview:** Last sentence

**“It may be impractical to avoid areas of social, economic, or cultural value”**  
***Recreational*** areas should also be taken into account.

**Application:**

***Recreational*** should also be added to the first sentence as areas considered in the environmental assessment.

**“We undertake an environmental assessment screening process....”**

The environmental assessments undertaken for ASA Flight Path Design purposes should be undertaken by an ***independent environmental assessor*** to avoid a conflict of interest. Therefore, the society suggests that ***“independent”*** be added in the application paragraph regarding the environmental screening process.

**Principle Type: “Noise and Community Principles”**

**Principle:**

**“Where high-density residential areas are exposed to noise, consider flight path designs that distribute aircraft operations, so that noise can be shared”**

Why has “high density” residential areas (P19) now been added as a qualification to identify noise sensitive areas? Does the ASA 1995 specify high density areas only i.e. excludes most regional cities?

The “high density” exclusion should be dropped from the principle. It should read:

*“Where residential areas are exposed to noise.....shared”  
Also drop “high density” from Application, second paragraph.*

**Monitoring:**

*Monitoring should include the monitoring of all airports not just Sydney (Kingsford Smith) Airport e.g. Bankstown Airport, Camden Airport.*

F. RE: “Where noise exposure is unavoidable consider Noise Abatement Procedures that adjust aircraft operations to reduce noise impacts, including consideration of the time of these operations” (p 21)

This principle does not accurately reflect the ASA 1995 which states there is an **obligation** to provide environmental impact of aircraft operations, including the impact of aircraft noise.

It would be less misleading and more accurate to alter this statement to

*“Minimise the environmental impact of noise exposure by applying the NAP’s including the timing of these operations.”*

**Overview:** NAPS, should include on the list the following:

*Avoid flight paths over regional residential communities*

**Principle Type:** “Efficiency and Environmental principles”

**Principle:**

**“Design flight paths that deliver operational efficiency and predictability and minimise the effect on the environment through reducing fuel consumption and emissions.”** (p 27)

This Principle reads although being a part environmental principle, as **“we will fly the shortest distance between two points as the only way to protect the environment”**. This can be interpreted that a flight paths predominant planning principle after safety concerns is this principal and result in paths over the sensitive areas identified in the

principle regarding matters of National Environmental significance etc on P 25 could well be over sensitive areas.

By extracting a section from the Overview, paragraph 4 (P.27), which **also refers to protecting the environment and reducing the impact of aircraft noise**

This statement could be rewritten as: -

*Design flight paths that deliver operational efficiency and predictability, minimise the effect on the environment and reduce the impact of aircraft noise.* (i.e. not just considering fuel consumption alone.)

**Further Question:**

Will the flight paths created under these principles be available for public scrutiny with access to the reference and decision-making process documentation?

Please contact Adam Curry – Blue Mountains Conservation Society - National Parks Officer on 02 7808 6679 if you have any questions.

Your Sincerely



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