

Monday, 9 October 2017

Aircraft Operations
Aviation Environment Branch
Department of Infrastructure and Regional Development
GPO Box 594
CANBERRA ACT 2601

RE: Proposed amendments to the Air Navigation (Essendon Airport) Regulations 2001 Public Consultation Paper September 2017

Established in 2008, Southern Cross Jets is a provider of private jet charter, management, and hangarage services based at Essendon Airport.

Our client profile requires flexible and on demand specialised services seldom provided by the regular commercial airline carriers. Such services include, however, are not limited to;

- Entertainment Tours
- Diplomatic and Government Travel
- Business Travel
- Premium Tourism
- Medivac

Along with other General Aviation (GA) operators, we are faced with ever increasing inefficiencies and costs directly related to legislative requirements and restrictions. We welcome discussion on any proposal that improves efficiencies and environmental impact.

Southern Cross Jets Response to Regulations Amendments

Proposal 1 – lifting the weight restriction from 45,000kgs to 55,000kgs for non-curfew operations

At present Southern Cross Jets does not operate any aircraft above 45,000kgs as current airport restrictions would make any such operation unviable. We agree in principal with consultation paper.

Proposal 2 – Removing the ability of non-emergency helicopters and propeller-driven aircraft to operate at Essendon Airport during the curfew

We agree with the proposed amendments; however, we believe that if propeller driven aircraft meet ICAO chapter 3 requirements, they should be able continue to land during periods or curfew.

I understand that the majority of noise complaints during curfew periods are mostly attributable to rotary wing aircraft, for which the majority of movements are for police or air ambulance operations. These are essential public services and need to be supported in every way possible. I believe better community outcomes could be achieved by the development of noise abatement procedures including, but not limited to, arrival and departure flight paths and altitude requirements.

Proposal 3 – Allowing jet aircraft movements during the curfew.

On occasions (planned or unplanned) we are required to operate to / from Melbourne during published curfew periods at Essendon Airport, requiring the aircraft to either land or depart from Melbourne International Airport and then be relocated to Essendon after curfew.

The requirement to relocate aircraft for adherence to regulations adds significant cost to our operation (and customers) and unnecessarily increases our environmental impact.

Although we agree in principal to the proposed amendments, we believe the limiting db rating is inconsistent with any other Australian airport regulation and discriminates between operators.

The current proposal limits aircraft during landing phase to be less than or equal to 90db. This would exclude all our aircraft from landing at Essendon, however, the same aircraft can operate into Sydney, Adelaide, and Gold Coast during curfew periods. The proposal is not consistent with existing curfew regulations.

Noise restrictions should directly reference ICAO standards (for example Chapter 3) for which aircraft are tested during certification. By referencing ICAO documented noise standards in curfew regulation, it;

- gives greater clarification to operators,
- removes competitive influence when setting legislative restrictions (transparency),
- avoids expensive noise testing,
- promotes regulatory consistency.

If the general community is not accepting of Chapter 3 ICAO standards, then we would support a 92db rating in conjunction with noise limiting practices as outlined below – only a 2.2% increase over the proposed 90db approach noise.

Much of the jet aircraft noise on landing is generated by the use of reverse thrust above idle. As stipulated for Sydney airport, pilots of aircraft should use the minimum reverse thrust necessary for the safe operation of an aircraft. This would greatly reduce the noise and environmental impact during the landing phase.

To ensure the surrounding airport communities noise concerns are met during curfew periods, a restriction on arrivals allocated via a slot scheme could be implemented along with a trial and consultation period.

For reference please find attached the ICAO noise certifications for the aircraft that we currently operate.

- 2010 Gulfstream G450 (16 passengers and 3 crew)
- 2010 Legacy 600BJ (13 passengers and 4 crew)

Southern Cross Jets would like to thank you for the opportunity to make this submission.

Alex Kepper
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ICAO Noise Data Base

ID:GULFSTREAM_10065

MANUFACTURER AND MANUFACTURER'S DESIGNATION OF AIRCRAFT

Manufacturer GULFSTREAM
 Commercial name
 Type GIV Version

ENGINE

Type TAY Mk 611-8
 Number of Engines 2
 Nacelle
 Propeller
 Thrust (Sea Level Static) 61.60 kN
 ByPass Ratio(SLS) 3.0
 Maximum Take-Off Mass 33204 (Kg) Slats/Flaps 0/10
 Maximum Landing Mass 26535 (Kg) Slats/Flaps 0/39

NOISE CERTIFICATION STANDARD

Noise Regulation FAA FAR Part 36
 Chapter or Stage 4

MODIFICATIONS

	Aircraft	Engine
Modification Number	ASC 487	
Modification Description		

	Lateral/Full-Power	Approach	Flyover
Noise Level (EPNdB)	87.7	91	78.6
Noise Limit (EPNdB)	94	98	89
Margin (EPNdB)	6.3	7	10.4

Cumulative Margin (EPNdB) 23.70

Remarks -

Date of Certification 10/12/10 Certification Authority FAA



ICAO Noise Data Base

ID:EMBRAER_10000

MANUFACTURER AND MANUFACTURER'S DESIGNATION OF AIRCRAFT

Manufacturer EMBRAER
 Commercial name Legacy 600
 Type EMB-135 Version BJ

ENGINE

Type AE3007A1E
 Number of Engines 2
 Nacelle
 Propeller
 Thrust (Sea Level Static) 39.10 kN
 ByPass Ratio(SLS) 4.8
 Maximum Take-Off Mass 22500 (Kg) Slats/Flaps (-/9°)
 Maximum Landing Mass 18500 (Kg) Slats/Flaps (-/45°)

NOISE CERTIFICATION STANDARD

Noise Regulation RBHA 36/14 CFR Part 36 Amendments 1 through 27
 Chapter or Stage 4

MODIFICATIONS

	Aircraft	Engine
Modification Number		
Modification Description		

	Lateral/Full-Power	Approach	Flyover
Noise Level (EPNdB)	86.8	91.3	79.7
Noise Limit (EPNdB)	94	98	89
Margin (EPNdB)	7.2	6.7	9.3

Cumulative Margin (EPNdB) 23.20

Remarks -

Date of Certification 10/12/01 Certification Authority ANAC