



Jerrabomberra Residents Association Inc.

PO Box 132
Jerrabomberra NSW 2619

President. **MARGOT SACHSE**
Telephone 02 62559710
Email. margot@webone.com.au

www.jra.asn.au

Secretary. **LYN EDWARDS**
Telephone 02 62998199
Email. ljedwards_2619@hotmail.com

Email: info@canberraairport.com.au

Canberra International Airport
1/2 Brindabella Circuit
Canberra Airport ACT 2609

Dear Sir

2009 PRELIMINARY DRAFT CANBERRA INTERNATIONAL AIRPORT MASTER PLAN

Thank you for the opportunity to provide a submission to the 2009 Preliminary Draft Canberra International Airport Master Plan (PDMP). Please find a response from the Jerrabomberra Residents' Association (JRA) attached.

Yours faithfully

Margot Sachse
JRA President

7 May 2009

cc Hon. Anthony Albanese MP – Federal Minister for Infrastructure Transport, Regional
Development and Local Government
Dr Mike Kelly MP – Federal Member Eden-Monaro
Steve Whan MP – State Member for Monaro

WHAT IS THE JRA?

The Jerrabomberra Residents Association (JRA) is one of the largest and most active and vocal community organisations in the Queanbeyan City – Canberra region.

We were formed by volunteers from the newly established Jerrabomberra community in the early 1990s, to help foster community spirit and develop caring relationships between local families. Over time, the JRA became increasingly involved with advocacy and lobbying for the particular needs of our community, at a Local, State and Federal level. We now represent over 9000 residents in the Queanbeyan City Council area, who reside in the 2619 postcode.

While we maintain our 'community' focus and desire to make Jerrabomberra a special place to live, we now also draw on the collective experience, qualifications, and skills of our JRA members to ensure infrastructure and Governments address resourcing concerns.

From the organisation of Christmas 'Carols by Candle Light', to the campaigning for a much-needed school, the JRA has been the foundation for creating our unique and harmonious community. Regular monthly meetings, democratic elections, and a large, inclusive membership mean we represent all community views. We deliver on a broad community agenda, and work for all residents in Jerrabomberra.

Many years of having a single entry and exit point has resulted in a harmonious, 'village' environment and it is one of the great attractions of living in Jerrabomberra. We have developed a very strong sense of 'community' and it is this ambiance that we wish to preserve.

Jerrabomberra residents are all too familiar with the impact aircraft noise has on their daily lives. This has become a major problem since December 1995 when, at the request of the ACT Government, the flight path was changed and all planes were funnelled down the western side of Jerrabomberra. The Instrument Landing System (ILS), or the flight path centre line, goes from Church Creek along the western part of Jerrabomberra to the end of the runway. With 489 residences currently falling outside the current noise abatement area, aircraft noise is a regular concern to all Jerrabomberra residents as aircraft noise does not stay outside the noise abatement area and Canberra Airport currently does not have a night time curfew.

EXECUTIVE SUMMARY

Following on from the rejected 2008 Preliminary Draft Master Plan (PDMP), again the Canberra Airport Group in their dogged pursuit of getting Federal government approval for a 24/7 freight hub, have produced a PDMP for Canberra Airport that is set out to confuse the community. Furthermore, the 2009 version attacks the Jerrabomberra community as they plan to subject our community to 24/7 jet aircraft noise in their pursuit of personal profit.

It is the position of the JRA that Canberra Airport is a regional inner city airport servicing the local community, and as such, it must continue to operate within this framework. The Airport's desire to operate as a 24-hour freight hub and become Sydney's second airport should be curbed with a legislated curfew between the hours of 11.00pm and 6.00am. We believe this is the only way to protect the interests of the Canberra-Queanbeyan community and ensure we will be able to sleep at night without the intrusion of aircraft noise.

CONSULTATION

In rejecting the 2008 PDMP, Minister Albanese said, "I considered the public consultations and the outcome of that consultation to be deficient and inadequate".

The actions of the Canberra Airport in the release of the 2009 PDMP showed they continue to hinder the consultation process. It all started on 10 February, the day when the airport released the

PDMP onto its website as a single 57 MB file. The JRA could not get the file to load and when we queried the airport we were told that our computer might be having problems, despite a number of members being unable to load the file. We specifically requested on 10 February 2009 that the airport reduce the file into chapters. As the JRA is a volunteer and community organisation we also requested hardcopies due to the cost of producing our own, in order for the JRA to conduct a detailed analysis of the PDMP. These were not received until after the 12 March 2009, being the day of the Canberra Airport Aircraft Noise Consultative Forum (CAANCF) meeting. The JRA holds a position on the forum and was limited in its ability to provide detailed input due to the late delivery of the hardcopy PDMP.

The PDMP is presented in a manner that is set out to conceal the key matters that are of importance to our community. The PDMP (and the airport 40 minute presentation) focuses on increases in passenger numbers and splits the number of night time flights between chapters based on freight operations and passengers, sadly lacking any cumulative totals. Examples of proposed freight arrival and departure timetables (Figure 6.2) are fictitious to the core, as these are only indicative.

Contrary to statements issued by the Airport management, their consultation programme has been at best a minimalist approach. Whilst they have met with several key stakeholders including the JRA, most if not all of these meetings were organised by the community groups themselves with no assistance in costs or advertising by the Airport. In fact, the JRA is aware of only one community meeting that was organised, run by and paid for by the Airport. This is totally inadequate for the Airports requirement of community consultation, but alas, it does epitomise the Airports approach to its community and neighbours.

AIRCRAFT NOISE

Throughout the PDMP, the Airport attempts to assert its credentials as a 'responsible citizen' concerned about minimising the impacts of aircraft noise on the community. However, the Airport has now revealed the details of a proposal that will violate the quality of life for tens of thousands of residents in the ACT and NSW. The Airport's desire to operate as a nighttime freight hub, with large heavy jet aircraft landing and departing at two-minute intervals throughout the night and the early morning is not an example of a responsible citizen.

The PDMP acknowledges that the impact of the 24/7 freight hub will significantly impact on Jerrabomberra. "These figures demonstrate that no residents within the ACT, and only a few within Jerrabomberra, will be exposed at any time to noise over 65dBA as part of a freight hub".

This statement is false. We currently experience a low level of background noise (below 30dBA during the night). The World Health Organisation research indicates that sleep is disturbed with resulting health concerns at levels of 35-45 dBA. Aircraft noise events of 65dBA will disturb the whole Jerrabomberra and Canberra community. This is a fact as we currently experience this when passenger jets land after 11pm. A recent example is when Jerrabomberra residents were woken at 0200 hours on 31 March 2009 from a Tiger A320 producing 74dBA at the Jerrabomberra noise terminal. This plane woke up residents across our suburb including those inside the current Noise Abatement Area.

We find it insulting that the airport believes that it is acceptable for Jerrabomberra residents to be exposed to this level of noise at night. The JRA finds comments like those on page 80 "that only 800 houses have any meaningful exposure to aircraft noise from jet aircraft" a true example of how out of touch the airport is with the regional community, as this isn't the case in Jerrabomberra, with significantly more houses, each with families, exposed to the proposed freight jet aircraft noise.

Our community was approved for development prior to the Federal Government sale of the Canberra Airport. Most residents purchased in the area prior to the 2005 Master Plan being released, where the concept of a freight hub was first documented for the public. The proposed 24

hour freight hub represents a quantum leap in the operation of the airport which could not be expected to be within the consideration of current or potential residents.

Residents of the South Canberra Basin know aircraft noise impact results from not only flights overhead, but also from the explosive sound of landing aircraft engaging reverse thrust and departing aircraft at full power on takeoff. These events send sound shockwaves for kilometres through Canberra's calm, still night air.

In relation to the operation of the nighttime freight hub, the airport is deliberately deceptive and misleading. It attempts to paint a picture that the operation will be minimalist and its impact benign. It provides figures of X number of flights etc, however the airport has concealed from the draft PDMP its true intentions. The details of the Airport proposal are outlined in a report by Rehbein AOS. The table at page 14 of the Report sets out the details. On an annual basis, there will be 122,086 nighttime movements, representing 334 planes every night, including nine 747 jumbo's, nine 777 jumbo's, ten Airbus A330's, 55 Boeing 737-800's, 29 Airbus A320's and 35 Boeing 757 freights. Nighttime noise impact on areas such as apartments at Kingston Foreshore, only four kilometres from the runway, will be unbearable and property values will plummet.

On page 174 of the PDMP, the Airport says "...a curfew is not necessary at Canberra Airport...". It may be reasonable to make this statement now. However, in its own documentation, the Airport announces plans to handle hundreds of large aircraft throughout the night making a curfew the only means to provide noise respite to thousands of ACT and NSW residents. The JRA believes it is fair and reasonable the Airport should be saved the expense of planning and developing the airport for night-time operations by an early decision on a night-time curfew between 11.00pm and 6.00am.

The cost to implement a Sydney style curfew at Canberra Airport now would be negligible, however if a curfew was to be introduced at some date in the future, and considering that most in the Region believe this is inevitable, the cost to the community and business and the cost to the economy and employment will be devastating. We are currently in the fortuitous position of being able to preempt this disastrous situation from arising by accepting the inevitability of a curfew and implementing it now before any harm to the community and economy is done.

The introduction of a curfew is inevitable. The Managing Director of Canberra Airport constantly refers to the power of public opinion to influence political decisions particularly when marginal parliamentary seats such as Monaro and Eden-Monaro are involved. If Canberra Airport seeks to expand its night time operations it will be subject to a curfew in the same manner as Adelaide airport under the former Coalition Government.

The airport must declare publicly its intentions as outlined in the Rehbein AOS report, it must publish the full details in the PDMP and it must engage in community wide consultation specifically on this issue. Otherwise the airport is not meeting its public responsibility and also, again, not consulting freely with the public - the same reason the 2008 PDMP was rejected.

The number of aircraft movements contained in the Practical Ultimate Capacity (PUC) ANEF is based on the theoretical capacity of the current Canberra airport runway system and has no correlation with the reality of actual aircraft movements and climatic conditions regularly affecting the airport. While Air Services Australia has approved the PUC ANEF for technical accuracy, the JRA believes the Federal Government needs to undertake an independent review of assumptions and data underpinning the PUC ANEF, to ensure it is a realistic forecast of actual movements, prior to approving the PDMP. Failure to undertake this review will undermine the ANEF system, which is used by various State and Local government bodies as a key planning tool.

In the PDMP, much emphasis has been placed on the Required Navigation Performance (RNP) curved approach to provide noise relief for Jerrabomberra residents. The RNP only applies to Qantas 737-800 aircraft currently just one to two flights a day, depending on weather and crew

ability/choice, so many flights continue to use the runway centreline. The Qantas 737-800 fleet only use the RNP approach for about 35% of arrivals.

The airport was the guest of the JRA at our April meeting to specifically discuss the PDMP. In excess of 100 concerned residents attended this meeting arranged by the JRA. During the presentation Noel McCann Director of Planning Canberra Airport, spent a significant amount of time speculating to our community on moving flight paths away from Jerrabomberra into the Jerrabomberra Valley. He spoke at length of having more planes landing from the north and more planes using the RNP approach. This is will never be a reality as the majority of the planes will continue to use the ILS for safety and weather reasons, as is the case now.

At all previous CAANCF meetings, the JRA have been informed that planes cannot be retro-fitted with GPS technology to enable them to fly the RNP and Virgin and the VIP fleet have not applied to CASA to use this technology. The new Virgin Embraer fleet are not RNP capable. Mr McCann stated at our meeting, that this wasn't the case now and that he had recently been told that the Virgin fleet have now been certified to go to the next step, but he didn't know when or if this would ever occur. In making this statement he has clearly provided a misleading statement to our community that isn't reflected in the PDMP, or in fact been confirmed by Virgin. In the current economic climate, technological enhancements by the airlines will be implemented only where necessary, therefore 68% of planes arriving into Canberra will continue to use the southern runway ILS on approach and northern runway on departure.

Canberra Airport has a desire to become Sydney's second airport. What is absent from the PDMP is the number of international arrivals post Sydney's 11pm curfew time that will be redirected to Canberra Airport once the new terminal is completed. These flights currently land in Brisbane. The impact of large jets arriving post 11pm and departing at around 5am will add to the proposed freight night time flights and make sleep for Jerrabomberra residents impossible.

Chapter 14 focuses on Aircraft noise and section 14.3 details the current measures in place to avoid noise disturbance. We currently have 5 turbo prop freight planes each night, and many landing from the north, we are appalled at the threats made by the airport to remove many of these noise abatement measures if development occurs in the Jerrabomberra Valley. Once again, the airport has sacrificed Jerrabomberra in their desire to make a profit.

RUNWAY OPERATIONS

In the current PDMP as well as in the 2008 version the JRA and the Jerrabomberra community are misrepresented. At page 181, the PDMP refers to a request from the Jerrabomberra community that all aircraft arrive from the north and depart to the south. It is our experience that planes departing and climbing at full power are noisier and the noise level more sustained than for arriving aircraft. These concerns are confirmed by a statement of Airport Executive Director Tom Snow published in *The Queanbeyan Age* of Friday 13 July 2004. Mr Snow said, "Planes taking off are noisier than one's landing". He also said, "A plane taking off needed much more power and was much louder, reaching 70 to 75 decibels". At the same time, there has been no diminution in the number of aircraft arriving from the south, with the result that on many days within the same time frame, planes are both landing from and departing to the south. This operational pattern is detrimental to the interests of Jerrabomberra residents.

The JRA seeks relief for residents by securing the maximum number of departures to and landings from the north. This is our preferred position. However, it is recognised that with prevailing north-westerly winds, the existence of only one ILS and that on Runway 35, and terrain constraints, will combine to ensure that for practical purposes in the immediate future arrivals from the south will continue to be the operational pattern.

CHANGING THE LANDING THRESHOLD

At page 109, the airport proposes to change the runway threshold in June 2010. We are strongly opposed to any shift in the landing threshold for runway 35.

The JRA is concerned any change in the landing threshold for runway from its current position will result in an increase in noise for Jerrabomberra residents as planes will be about 20 metres (60 feet) lower over our suburb. The Airport wrote to the JRA on 18 January 2006 informing us the runway thresholds were not being moved from their current location "at this time". This contradicts all public statements the Airport made regarding moving the runway landing threshold, where in the media the Airport states the landing threshold will not be moved.

THE HIGH NOISE CORRIDOR

Over many years, the Australian Government, in consultation with State and Local governments has applied considerable effort to establish guidelines for land-use planning decisions in areas affected by aircraft noise. Every political jurisdiction has endorsed the Australian Standard 2021 (AS2021) as the basis of such planning decisions. The Australian Standard is designed to specifically protect the interests of airports and residents alike.

However, the Canberra Airport has invented its own concept known as the *High Noise Corridor*. This concept has no scientific or logical basis and was invented to serve the Airport's agenda of limiting community development, as evidenced by the Airport's opposition to the proposed Anglican High School and community facilities adjacent to Jerrabomberra.

The "High Noise Corridor" concept has been rejected by the Commonwealth and ACT Governments. The ACT Government specifically removed reference to it from the '*Canberra Spatial Plan*'. Because of its irrelevance, and also because of the concept to deliberately mislead and confuse, all reference to the High Noise Corridor should be removed from the PDMP.

NOISE IMPACTS OF A PARALLEL RUNWAY

For the first time the Airport has revealed its plans for construction of a third runway parallel to the existing North-South runway. This will be located 1.3 kilometres to the east of the current runway. In all their public, CAANCF and JRA presentations on the 2009 PDMP the airport has stated that the parallel runway is an initiative of the Howard government that is supported by the current Federal government. This flies in the face of the advice provided to us by our Federal member of Eden-Monaro Dr Mike Kelly AM (also Parliamentary Secretary for Defence Support). He has informed us that Department of Defence requires the land the airport has earmarked for the parallel runway and it is not available to the airport. Dr Kelly has informed us that he has clearly articulated this to the airport; therefore, the parallel runway should be removed from the PDMP.

Noel McCann, the airport's Director of Planning informed us at the CAANCF that "this runway is in the plan and will be staying in it". He went on to say that planes using it will be limited to landing from the north and there will be no southern departures or arrivals; however this detail is omitted from PDMP and is unbelievable.

The Government must refuse to endorse the PDMP until such time as the Airport withdraws the parallel runway proposal, or alternatively, produces an ANEF contour map to form the basis of further community consultation not simply state that once it is in the master plan we will consult further with the community when it is in the planning stages – this is far too late.

NOISE ABATEMENT AREAS

The Noise Abatement Areas have been in place since 1995. They are not legislated, but most aircraft pilots respect them and avoid flying over the areas except for weather or medical emergency.

These areas provide some respite for our community 24/7. In the PDMP, the airport state that the airport wishes to expand the areas to cover residential development in Gungahlin and Googong, even though Air Services has told the community for the past couple of years at the CAANCF meetings that for operational reasons they will not be changing the areas. However, in the airport continues to propagate the myth that they will ban all overnight aircraft operations over the Noise Abatement Area between 11pm and 6am; however we have them now 24/7.

“Canberra Airport recognises that the community is concerned about the impact of aircraft noise, particularly at night. The Master Plan proposes two key new noise abatement measures that will ensure the community is not adversely impacted by growth in aviation activity at Canberra Airport:

- *A ban on all overnight aircraft operations over the Noise Abatement Areas between 11pm and 6am*
- *Extend the Noise Abatement Areas to cover the new suburbs of Gungahlin in the ACT and the proposed Googong residential development in NSW*
-

“Through these new measures, which we are locking in as part of our Master Plan, we are showing our absolute commitment to the community, by ensuring that the growth of the Airport, whilst benefiting the community, will not impact on the lifestyle of residents”, Mr Byron said.” Canberra Airport Media Release 10 February 2009

From time to time jets do fly over these areas for various reasons, and more often than not, sequencing is causing incursions in the noise abatement areas, within the current airport capacity. The JRA believes that with the predicted increase in the number of flights, that sequencing issues will increase, and so will the incursions into these areas. Only last month Virgin Blue breached the area and we were told by the Air Services Noise complaints department that Canberra Tower didn't even note the breach let alone report it to Virgin for follow up, when it clearly shows up on WebTrak.

The PDMP needs to clearly state the noise abatement areas for Canberra Airport are voluntary and are not legislated. Frequently, propeller aircraft cut the corners of the noise abatement areas and they do not apply to the VIP fleet that frequently breaches them when flying training circuits.

The JRA believes certainty about noise abatement areas can only be done through legislation and that the statement that the current areas will be changed by 2010 is false, as Air Services Australia have said on numerous occasions that due to airport operational reasons the areas will not be changed. The JRA suggests that the airport pursue the legislative route.

It is also the JRA's position that the current Noise Abatement Area will not provide the Jerrabomberra community with any respite when jets arrive between 11pm and 6am. This was evidenced on the Tiger A320 arrival on 31 March 2009 at 0200 hours. Those of us who reside well inside the noise abatement area were woken by the roar of the arriving jet. The only solution is to introduce a nighttime curfew.

ONGOING COMMUNITY CONSULTATION

Canberra airport has established the Canberra Airport Aircraft Noise Consultative Forum (CAANCF). This is a relatively recent creation following the airports unilateral abolition of the Canberra Airport Aircraft Noise Consultative Committee (CAANCC).

The airport restructured the consultation process to remove several key community groups and increase the representation of government agencies and commercial operators sympathetic to the airports interest. This was a deliberate action by the airport to manipulate the consultation process.

We were told at the last CAANCF meeting, that once again the airport will be changing the terms of reference of the committee to include more diverse groups like the Canberra Business Council whilst there is no intention to invite other community groups ie Burra or Fernleigh Park (residents that are under the ILS) to take up a position on the forum.

It is the view of the JRA that the community consultation should be independent of the airport and should be chaired and convened by an independent person appointed by the Minister for Infrastructure Transport, Regional Development and Local Government in a manner as applies at Sydney airport.

SYDNEY SECOND AIRPORT

It would appear from the draft PDMP that the Canberra Airport is attempting to become Sydney's second airport. This is clear from the desire to establish a 24 hour freight hub and 24 hour international flights with fast links to Sydney. The airport is supporter of building a fast rail service from Canberra airport to Sydney. All these developments are because the current Sydney International Airport is now operating at close to 100% in the hours that it is allowed to operate, being outside the curfew hours. It is totally unacceptable that the residents of ACT and southern NSW be exposed to frequent nighttime heavy aircraft noise just because a curfew in Sydney ensures the Sydney residents get some respite during the night.

CONCLUSION

On 21 November 2008, the Minister wrote to Stephen Byron advising he had denied approval of the draft Master Plan and that he required a new draft Master Plan within 180 days. The Minister stated 'the draft Master Plan provides insufficient detail which has compromised the quality of the public consultation process as it was difficult for the public to have a good understanding of the CAPL's future plans'

The JRA believes that this situation continues to prevail, in that the revised Master Plan fails to provide sufficient details about the proposed expanded night time operations – both freight and passenger flights and about the development of a proposed parallel runway.

In his letter the Minister said "the community require(s) certainty."

While the Canberra Airport continues to conceal and misrepresent its plans and fails to "provide sufficient detail", the Minister must once again refuse endorsement of the PDMP. Further, the JRA requests that all reference to the proposed freight hub be deleted from the PDMP until such time as the freight hub has been subjected to the Major Development Plan (MDP) procedures, referred to in the letter of Mike Ford A/g Executive Director Aviation and Airports to Tom Snow, Executive Director, Canberra Airport dated 10 July 2008. Such a process is necessary to ensure full exposure of the airports ultimate plan, and enable informed, transparent community consultation.