



## *Jerrabomberra Residents Association Inc.*

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Canberra International Airport  
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Canberra Airport ACT 2609

Dear Sir

### **2008 PRELIMINARY DRAFT CANBERRA INTERNATIONAL AIRPORT MASTER PLAN**

Thank you for the opportunity to provide a submission to the 2008 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

26 February 2008

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 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 around 7000 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 resourcing concerns are addressed by Governments.

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 parts of Jerrabomberra to the end of the runway. With 489 residences currently falling outside the current noise abatement zone, aircraft noise is a regular concern as Canberra Airport currently does not have a night time curfew.

## EXECUTIVE SUMMARY

The JRA believes the 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 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.

## 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 of tens of thousands of residents of the ACT and NSW - the Airport's operation as a night-time freight hub with large jet planes landing and departing at two-minute intervals throughout the night and the early morning.

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 calm, still night air.

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 night time 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. Night-time noise impact on areas such as apartments at Kingston Foreshore, only four kilometres from the runway, will be unbearable and property values will plummet.

At page 84 of the PDMP, the Airport says "...a curfew is not necessary at Canberra Airport...". It may be reasonable to make this statement at the present time. But in its own documentation, the Airport announces plans to handle hundreds of large aircraft throughout the night. 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 number of aircraft movements contained in the draft 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 impacting on the airport. While Air Services Australia has approved the draft ANEF for technical accuracy, the JRA believes the Federal Government needs to undertake an independent review of assumptions and data underpinning the draft 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. Unfortunately, this only applies to Qantas 737-800 aircraft that are just one to two flights a day, depending on weather and crew ability, so many flights continue to use the runway centreline. Planes cannot be retro-fitted with this technology and Virgin and the VIP fleet haven't applied to CASA to use this technology. The new Virgin Embraer fleet are not RNP capable. The JRA believes offset approach technology will only be used in a limited manner at Canberra Airport and will provide negligible relief for the Jerrabomberra community. This needs to be reflected in the PDMP.

## RUNWAY OPERATIONS

As in the previous Draft Master Plan from the Canberra Airport, the JRA and the Jerrabomberra community are misrepresented. At page 133, the PDMP makes reference to a request from the Jerrabomberra community that all aircraft arrive from the north and depart to the south.

The JRA requests for the reference to this request be removed from the PDMP. This is an incorrect statement of the views of the JRA in relation to aircraft arrivals, and grossly misrepresents the views of the Association. The correct position of the Association is clearly recorded in the minutes of the meeting of the Canberra Airport Aircraft Noise Consultative Committee (CAANCC) on 11 March 2004. This meeting was convened and chaired by the Airport. Page 5 of the minutes records:

*"That the Jerrabomberra Residents' Association rescinds the motion for take offs to the south adopted in November 2002.*

*That the Jerrabomberra Residents' Association requests the maximum number of take offs to the north and landings from the north."*

The CAANCC minutes accurately reflect the JRA position. It has been our experience 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.

We have previously stated our position in our submission to the 2004 PDMP and at the public consultation forum on 18 December 2007 refuting Tom Snow's assertions that "he knew nothing about the JRA's change of view in regard to this matter" when clearly the airport has chosen to ignore our position.

## CHANGING THE LANDING THRESHOLD

We are strongly opposed to any shift in the runway 35 landing threshold.

The JRA is concerned any change of the runway 35 landing threshold 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.

## CANBERRA AIRPORT AIRCRAFT NOISE CONSULTATIVE FORUM

In the PDMP section on aircraft noise, the Airport makes constant reference to its consultation with the community. The facts give the lie to the validity of this claim.

To meet its statutory obligation, Canberra Airport set up a body described as the Canberra Airport Aircraft Noise Consultative **Committee** (CAANCC). It included government agencies, the aircraft industry and representatives of communities affected by aircraft noise. Its operations and Terms of Reference were established after close consultation with the participating community organisations.

Through its control of the agenda, the Airport managed to limit discussion to those issues which suited its commercial interests. However, when the CAANCC sought to consider matters not suiting the Airport (particularly the Queanbeyan City Council policy of a night-time curfew) the Airport unilaterally abolished the Committee and replaced it with a new body called the Canberra Airport Aircraft Noise Consultative **Forum** (CAANCF).

In this new body, the Airport increased the number of sympathetic government and industry representatives, but excluded NSW community groups affected by aircraft noise. Additionally, the Airport imposed restrictive Terms of Reference without consultation with community groups.

In establishing the new body, the Airport sought to exclude the JRA, but after intervention by the then Member for Eden-Monaro Gary Nairn, and the former Transport Minister, the Airport included the JRA.

The behaviour of the Airport in relation to the CAANCC could be seen as an attempt to manipulate community consultation attempts.

The JRA believes CAANCF should be abolished in its current form, and be replaced by a body truly representative of those communities affected by aircraft noise. It should be chaired and convened by an independent person chosen by the Federal Minister for Infrastructure Transport, Regional Development and Local Government.

## 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, 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 one kilometre to the east. This places planes directly above the city of Queanbeyan and creates a new aircraft noise problem completely ignored by the PDMP.

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.

## NOISE ABATEMENT AREAS

Claims that jets don't over fly noise abatement areas are false. 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.

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 breach them when flying training circuits.

The JRA believes certainty about noise abatement areas can only be done through legislation.

## THE ENVIRONMENT

In total, the PDMP supplied only three sentences to addressing air quality and environmental impacts. This could be interpreted as an example of dismissive and short-term thinking, reflected in the Airport's projections on its impact on Canberra and regional communities. With this short-term

thinking, the environment, the Canberra region community and the general public will become collateral damage in the Airport's attempt to capitalise on the corporate dollar.

The Airport's proposed expansion and introduction of a freight hub is at odds with the urgent need to reduce our nation's carbon emissions footprint. This action will undermine the efforts by all levels of government to reduce emissions and must be abandoned, simply put; it is not in the local or national interest.

While the principal greenhouse gas emissions from aircraft is CO<sub>2</sub>, other emissions and pollutants include nitric oxide and nitrogen dioxide, water vapour, soot and sulfate particles, sulfur oxides, carbon monoxide, and a number of others depending on the type of aircraft in use. Non essential lift-on – lift-off air freight is not sustainable, when alternatives are far less damaging the environment and the surrounding community.

Potential long-term community health impacts include increased hospital admissions and emergency department attendances for respiratory problems, exacerbation of asthma and increases in respiratory problems with symptoms such as cough, wheeze and medication usage. This should be enough on its own to end this proposal.

Based on the night-freight projections, if the PDMP is endorsed, it is expected the Canberra Airport business alone will contribute to 1.5 per cent of the total emissions for Australia by 2050. Despite the aviation industry improving its emissions over the past 15 years, the increase in usage is outstripping any gains and imposing severe consequences for local communities, the nation and the planet.

Supporting the proposed freight hub operation of the Canberra Airport will generate a large increase in road freight transport vehicles. Fuel tankers and freight trucks will dominate the roads and highways to support one business - the Airport. In short, the freight hub proposal is based on flying freight away from Sydney and then freighting it back by road to Sydney. This creates an even wider negative greenhouse footprint, with the environmental costs being placed squarely on ACT residents. The JRA believes this cannot be allowed to happen.

The Canberra Airport often uses the tag line "Australia's Greenest Airport". This is totally unfounded. As admitted by Mr Tom Snow at the community consultation meeting on 18 December 2007, this statement only applies to the non-aviation infrastructure such as the new office accommodation built at Brindabella Business Park. Mr Snow also admitted no study has been undertaken to substantiate the Airport's claim. This claim can only be regarded as a marketing tool. The PDMP states "the air quality at the Airport and in Canberra more generally is excellent and there is no significant adverse impact expected from future Airport operations." One can only assume the Airport is referring to operations other than the increase in air-freight. This statement needs to be deleted from the PDMP.

A report by 'The Australia Institute' has looked into the impact of Canberra Airport's plans to expand. It has found the ACT's target to reduce emissions by 60 per cent by 2050 is unlikely to be achieved if the Airport's plans go ahead. The Institute's Clive Hamilton believes a major boost in passenger numbers will lead to massive increases in emissions. "By around about 2040, Canberra Airport will account for all of the ACT's greenhouse gas emission allowance," he said.

While the potential negative environmental impact of typically, older and noisier air freight aircraft alone requires extensive detailed independent research, we can see no advantage to the people of the Canberra/Queanbeyan region of moving Sydney's freight to Canberra so it can be road freighted back to Sydney.

## JET FUEL SUPPLY

The fruition of the Canberra Airport becoming Sydney's second airport will not only increase the influx of aircraft to the region, it will also increase the requirement to fuel such aircraft. The increase to Canberra Airport, air side operations will bring significant stresses to supplying jet fuel Aviation Turbine (AVTUR/FSII) to the airport. These stresses will not be limited to the airport alone and will be felt across the entire community. With the growth of air movements in frequency, size and type of aircraft, as well as the departure destination and the weight of freight being transported out of Canberra will play a significant part in the overall fuel requirements.

The recent completion of the new fuel farm at the airport has the capacity to store 550,000 litres of jet fuel – the PDMP at section 12.4.6 page 111 states “As the Airport grows..., it is expected that more hazardous goods will be handled by us, by contractors and by Airport tenants”

The suggestion that B-doubles and even B-triples could be employed to keep up with the high demand for jet fuel will significantly increase the number of tankers travelling the roads from Sydney to Canberra. If the predicted annual aircraft movements for 2027/28 reach even the lowest estimates of 136,209 - almost double the current movements - this will mean fuel deliveries to the airport will also double.

The majority of supplies are conveyed in B-double and B-triple semi trailers that access the Airport from the Federal Highway via Majura Road. These are long vehicles which travel at highway speeds, but require greater safety margins between other vehicles and longer breaking distances. An increased presence of these vehicles on our roads will put the public at unnecessary risk.

This increase in congestion is going to be exacerbated through the use road fuel transport, and freight transport to and from the Airport. The Canberra Airport website presents data showing the estimated traffic increase when the freight hub is established. It is assumed this does not include fuel truck movements to and from the airport. This data must be included in the PDMP.

Investigations by the JRA details the following planes maximum fuel capacity and the estimated number of tankers required to carry the fuel:

A333-200	139,100 litres = 4 singles tankers
A330-300	97,170 litres = 2.8 single tankers
787/3/8	126,917 litres = 3.7 single tankers
787/9	138,898 litres = 4 single tankers
747-400	216,840 litres = 6 single tankers
A340-300	141,000 litres = 4 single tankers
737-600	26,020 litres = 1 single tanker
A380	310,400 litres = 9 single tankers

An oil tanker holds approximately 34,000 litres of fuel. Some of these trucks can measure up to 36 metres in length and would mix with cars on some of the states busiest roads. This is clearly a recipe for disaster.

If the Canberra Airport reaches its 2027/28 target of 136,209 flights per annum, the number of tankers required to fuel these flights would be astronomical. The JRA does not consider it in the community interest to have tanker/car interaction of this magnitude on the Sydney to Canberra road system.

The recent Fuel by Rail Scheme initiated by the NSW Government provided \$1.655 million for the 2007/08 financial year, to support the transport of petroleum fuel by rail over the Blue Mountains from Sydney to any nominated destinations west of Lithgow. Canberra Airport should also investigate this Scheme to minimise the number of tankers on the road.

## **ROAD AND RAIL INFRASTRUCTURE**

The PDMP does not effectively deal with the issues of road and infrastructure degradation. If the airport is allowed to expand to the level that is proposed, the already congested roads around the airport (peak periods exacerbated with the recent commencement of the Pialligo Avenue upgrade), and the surrounding roads that service the ACT and southern NSW regions in general, will be put under further traffic stress and degradation. The PDMP appears to turn the issue of increased use of the Majura Road to the expansion of existing and new suburbs in Canberra/Queanbeyan, and fails to accept responsibility for the significant impact Brindabella Business Park has on the current traffic situation.

The concentration of road, air and potential rail services in the one integrated facility at the Canberra Airport will have a substantial impact on the existing road infrastructure surrounding, and leading up to, the airport. Although the Airport has provided for funding in the upgrade to Pialligo Avenue, which is important leading up to the intended upgrade of the terminal facilities due to commence mid 2008, funding for the required improvement to the outer lying road and potential rail service to cope with this expansion, and estimated 4.2% per annum in passenger/freight traffic, appears to lie with the ACT, NSW and Federal governments. The JRA considers this to be unacceptable.