

CURFEW 4 CANBERRA SUBMISSION ON THE CANBERRA AIRPORT 2008 PRELIMINARY DRAFT MASTER PLAN (PDMP)

Who is Curfew 4 Canberra Inc?

Curfew 4 Canberra Inc is a 'federated' community organisation formed by eight Canberra and one NSW community associations to act on their behalf relating to issues pertaining to the Canberra Airport. Its membership draws on the residents associations of Pialligo, Hackett, Watson, North Canberra, Gungahlin, Narrabundah and Jerrabomberra, and forming organisations from Ainslie and Campbell.

Curfew 4 Canberra Inc has been formed in response to the dramatic changes proposed in Canberra Airport's draft 2008 Master Plan, in particular the unrelenting night time aircraft movements, and the impact this will have on the quality of life for all residents of the Canberra region.

Since privatisation of Canberra Airport in May 1998, past development proposals have proved contentious to the broader Canberra community. Past community concerns were largely ignored and development proposals appeared to be rubber-stamped by the Howard Federal Government. For these reasons and the opportunity afforded by the change in the Federal Government for a fresh approach, various community associations near the Airport and its flightpaths formed a single umbrella association to address the Airport PDMP. There is a groundswell of community support for Curfew 4 Canberra's position evidenced by attendance at our public meeting, letters to the editor, and numbers of people signing our petition.

EXECUTIVE SUMMARY

Statement of Issues:

- ◆ **Insufficient Information.** The PDMP provides a poor evidence base and unreliable information; there is insufficient, reliable information to reach an informed judgement.
- ◆ **Historical Lack of a Curfew is Exploited.** This plan seeks to exploit the lack of a curfew at Canberra Airport to draw business away from Sydney Airport.
- ◆ **Inflated Projected Movements.** Projected movements far exceed that sustainable by the Canberra regional population and are simply not credible.
- ◆ **Excessive Aircraft Noise.** Canberra and Queanbeyan residents are not protected from significant adverse aircraft noise now, let alone in the future with far more movements of larger, noisier aircraft, including through the night. Current noise abatement procedures are voluntary and a farce. The noise readings taken at Hackett demonstrate that the aircraft noise modeling is flawed. There is no modern, scientific definition of 'acceptable' aircraft noise. The World Health Organisation is expected to deliver such a definition later this year.
- ◆ **Need for a Curfew.** The projected night movements by larger, noisier aircraft, the high noise readings compared to the noise modeling, the jet noise levels relative to background noise, and the health concerns combine to mandate the introduction of a curfew to protect residents.

- ◆ **Objection to Parallel Main Runway.** Curfew 4 Canberra Inc opposes construction of a parallel, main runway.
- ◆ **No Evidence to Support a Freight Hub/second Sydney Airport.** The development of Canberra Airport as the national and international freight hub in the near future and then as the second Sydney Airport needs to be determined as a matter of national policy before being reflected in the PDMP.
- ◆ **No Evidence of ACT Economic Benefit.** The perceived benefit to the wider ACT economy is indeterminable. There is no economic analysis or risk assessment.
- ◆ **Negative Impact on Climate Change.** There is no address of climate change issues in the PDMP. The proposed business-as-usual approach undermines greenhouse gas emission reduction policies and programs. Positioning a national freight hub at the least important node in the distribution system is not sustainable transportation, nor good practice.
- ◆ **Unfair Process.** The current process provides unfair advantage to the proponents; a balanced process giving residents' equal weighting and access to Government is clearly required.

Recommendations:

1. *Curfew 4 Canberra Inc is totally opposed to noise sharing with Sydney Airport.*
2. *Curfew 4 Canberra Inc recommends that the Minister for Infrastructure Transport, Regional Development and Local Government immediately impose an 11 pm to 6 am curfew on Canberra Airport to provide certainty to the community that we will be able to sleep without the intrusion of aircraft noise.*
3. *Curfew 4 Canberra Inc recommends that the Federal Government economic and transport authorities assess whether positioning the national/international freight hub at Canberra Airport is in the best national interest for sustainable logistic and transportation systems.*
4. *Curfew 4 Canberra Inc recommends that the Federal Government undertake an independent review of the assumptions and data that underpin the draft ANEF to ensure that it is valid prior to approving the PDMP.*
5. *Curfew 4 Canberra Inc recommends that the Federal Government undertake a detailed, triple-bottom line analysis of the proposed expansion in the PDMP.*
6. *Curfew 4 Canberra Inc recommends that every reference to the High Noise Corridor in the PDMP be removed.*
7. *Curfew 4 Canberra Inc recommends that the true basis of the 24-hour operation of Canberra Airport be described in the PDMP.*
8. *Curfew 4 Canberra Inc recommends that the airport recalculate the number of residents who live outside the noise abatement areas to reflect today's location of houses using GIS data and reflect the true figure in the PDMP.*

INTRODUCTION

Canberra Airport released for public comment their 2008 Preliminary Draft Master Plan (PDMP) outlining the proposed development of Canberra Airport. Stemming from the key objectives (section 1.1) and exploiting the lack of a curfew at Canberra Airport, the PDMP contentiously proposes, amongst other matters:

- ◆ to increase annual movements from 80,788 in 2007 to a range of 136,209-180,551 in 2027/28 (Table 5.7), thence the ultimate capacity of 282,119 (section 6.5 Ultimate capacity). At ultimate capacity, over 120,000 movements (around 90,000 jet) will occur between 7 pm and 7 am – i.e. a night movement every two minutes or so, or a jet movement every three minutes. Movement of the larger, noisier jets is weighted to night-time. The majority of the increases in projected movements relates to airline and airfreight activity;
- ◆ to develop Canberra Airport as a 24-hour/day national and international freight hub;
- ◆ to become the second Sydney Airport, and
- ◆ to plan for a parallel, main runway to accommodate the large number of proposed movements.

Unsubstantiated Claim of 99.5% Protection. The Airport proposal rests entirely on the claim that 99.5% of Canberra and Queanbeyan residents are protected from aircraft noise and that such level of protection will continue into the future (section 11. Aircraft Noise, p 75). This statement is clearly inaccurate.

Defacto Development Application. In essence, the proposal to begin a 24-hour national and international freight hub in the near future and, as Sydney Airport reaches capacity, to become the second Sydney Airport, is a defacto development application for a significant increase in role for the Canberra Airport. Whilst it is a defacto development application, it does not cross the development application threshold of the Airports Act, suggesting that this Act needs to be strengthened significantly.

Disturbed Sleep. The key concerns for Curfew 4 Canberra Inc lie within these objectives and claims. The prospect of residents being sleep-deprived by jet movements during the night is extremely distressing for the community and shows what little respect Canberra Airport has for the Canberra/Queanbeyan community as a whole.

AIRCRAFT MOVEMENT PROJECTIONS

The centre-piece of the PDMP is the significant increase in the number of flights. The Airport proposes to increase annual movements from 80,788 in 2007 to a range of 136,209-180,551 in 2027/28 (Table 5.7), thence the ultimate capacity of 282,119 (section 6.5 Ultimate capacity).

At ultimate capacity, over 120,000 movements (around 90,000 jet) will occur between 7 pm and 7 am. The R-AOS report at page 14 details 23,846 night freight flights - that is 65 flights per night, and 96,647 night-time passenger flights being 265 flights per night. These flights will include long haul B747 freighters and large international passenger jets arriving and departing at the rate of one every two minutes. Currently we have four freight flights (propeller aircraft, not jets) arriving and departing each night and no passenger jets arriving or departing between 11 pm and 6 am.

The data that underpins the Ultimate Capacity figure is weighted to the movement of the larger, noisier jets during the night.

'In-flight aircraft noise will grow significantly as the frequency of flights grows, the size of aircraft grows and as the increased frequency of night-time operations grows.' Admission, PDMP, section 12.4.1.

Airport Encroaching on Residents. The impact of this level of aircraft traffic on Canberra/Queanbeyan residents' lifestyle would be catastrophic. In the still night air, residents in Jerrabomberra would be impacted on by the arrival and departure noise. Residents of Hackett, Ainslie, Narrabundah, Campbell, Kingston Foreshore and Watson will be constantly blasted by the reverse thrust of the engines of landing jets and the noise of take off; whilst Gungahlin residents will be kept awake by the noise of the constant departures. Clearly, the Airport's proposal to increase their current noise footprint into our community will seriously affect the quality of life of many of the region's residents. The Executive Director of the Property Council of Australia (ACT) acknowledges that the peaceful suburban lifestyle is a strength of Canberra (City News, 10 January 08, p 8). Regardless of where we live in the region, we are all entitled to a good nights sleep.

Past Aircraft Movement Projections. Past master plans have grossly overestimated aircraft movements and there is no reason to suggest the forecast in this plan will be any more accurate. Despite previous master plans since 1999 projecting increased movements, total annual movements have actually fallen significantly from 131,798 movements in 1999 to 80,788 in 2007. For the period 2004 to 2007, average movements over the four years have been relatively stable around 80,000 per year despite strong economic growth over this period, and a booming aviation market.

Increased Aircraft Seating Capacity. Twenty or so years ago, the Canberra airline market was serviced primarily by DC9s and B727s. When demand sufficed, the airlines simply switched up from the DC9 to the B727. The DC9 has since been replaced by the B737, and the B727 by the B767/A330. Both the B737 and the wide-body B767/A330 have significantly more seats than the aircraft they replaced. If passenger demand increases, the airlines, particularly Qantas as the dominant carrier operating into Canberra, will simply utilise larger capacity aircraft to flexibly meet demand. In the same way, the Q400 has replaced the Dash 8 on Sydney shuttles. Similarly, Virgin Blue would substitute B737s for the Embraer when demand required it. For these reasons, any significant, increased demand to fly to current destinations will only result in minor increase in aircraft movements, not the increased number of flights as detailed in the PDMP.

'The only service that has not risen in price at Canberra Airport is the air and noise pollution; that is still supplied free to residents.' Wag, Curfew 4 Canberra Inc.

Airfares (PDMP Foreword). The PDMP implies that cheaper airfares have derived from Airport cost reductions. However, the implied effect on airfares is not sustained by examination of Airport charges. In 98/99, passenger charges were \$2.27/passenger. For 05/06, the passenger charge had risen to \$7.98 – an increase of over 250% far exceeding inflation. Moreover in the past five years, Canberra Airport's Australian Competition & Consumer Commission (ACCC) rating has lingered between poor and satisfactory, despite a large increase in overall revenue (The Canberra Times, 3 November 2007,

Forum B3). Over this period, an Airport development charge of \$1.32/passenger has been levied; many residents of Canberra and Queanbeyan might wonder exactly what has been developed with this levy.

Curfew 4 Canberra Inc considers that with increasing fuel charges and interest rates, a prospective price on carbon and an economic downturn reducing discretionary funds (and thus demand and aircraft load factors), sustainable airfares will increase.

Projected International Air Services from Canberra (PDMP Figure 5.1). Regular, direct flights to Bali, Singapore, Kuala Lumpur, Bangkok, Hong Kong, Beijing, Tokyo, Hawaii, Los Angeles, Fiji, Auckland, Wellington and Christchurch are proposed. The majority of these direct flights require B767/A330 or longer-ranged aircraft. Bearing in mind that Canberra could not sustain a thrice-weekly B737 service to Fiji in mid-winter, the prospects of the Canberra region being able to sustain paying load factors for such wide-body aircraft seems remote.

Projected Domestic Air Services from Canberra (PDMP Figure 5.2). Proposed new, direct services include Launceston, Hobart, Avalon, Alice Springs, Darwin, Cairns, Townsville, and the Sunshine Coast. Services to Alice Springs, Darwin, Cairns and Townsville require B737/A320s and, again, the attainment of paying load factors will be difficult, thus further distorting the projected flight numbers in the PDMP.

24-hour Basis of the Airport (section 1.5 Location). The 24-hour basis of Canberra Airport derives from its past life as a RAAF operational base. Prior to privatisation, there never was a civil aviation requirement for services between 11 pm and 6 am, or as an international alternate. The RAAF helicopter squadron stood 24-hour search and rescue standby for southern NSW until the role was taken over by Southcare. Occasionally, Government VIP aircraft operated between 11 pm and 6 am, usually as a matter of operational convenience rather than a Government emergency necessitating such flights.

Curfew 4 Canberra Inc recommends that the true basis of the 24-hour operation of Canberra Airport needs to be described in the PDMP.

Deficiencies of the ANEF System. The ANEF system is weighted and highly sensitive to maximum noise levels, but quite insensitive to variations in movements. A small reduction in maximum noise levels, perhaps undetectable to the human ear, can allow a substantial increase in the number of movements. Residents, of course, would notice such an increase in traffic. The aviation industry obviously seeks to exploit this weakness of the ANEF system at community cost.

Effect of Aircraft Movement Overestimation. Overestimation of aircraft movements inflates the ANEF unnecessarily, limiting the potential utilisation of surrounding land to the overall cost of the community.

Curfew 4 Canberra Inc recommends that the Federal Government needs to undertake an independent review of the assumptions and the data and that underpin the draft ANEF to ensure that it is valid prior to approving the PDMP. The Federal Government should also assess the national implications of ANEFs constructed from inflated movement data.

AIRCRAFT NOISE ISSUES

In the PDMP, the Airport has advocated two underlying policies for managing aircraft noise:

- ◆ **‘Don’t Build Under Flight Paths’ (p 77).** The PDMP advocates a policy of ‘don’t build under flight paths’.
- ◆ ***‘The Airport and the community are absolutely opposed to noise sharing’*** statement, introduction to section 11, Aircraft Noise.

Curfew 4 Canberra Inc finds these two policies totally iniquitous. Further to this, we find that the facts presented to the community by the airport in the media to support these claims are inaccurate.

Since privatisation of the Canberra Airport in 1998, the airport owners have continually expanded their footprint into the Canberra community. For example, Jerrabomberra was located outside the ANEF 20 when development was approved in the early 90s. In late 1995, the flight paths were changed and aircraft noise was concentrated over Jerrabomberra with the extended runway centre line covering the western fringe of the suburb.

‘In the ACT, the rules governing motormower noise are more stringent than those for aircraft noise pollution’. Wag, Curfew 4 Canberra Inc.

The impact of aircraft noise on the broader Canberra community has increased significantly as a result of jet growth at the airport. Canberra residents are continuously affected today by aircraft noise in Pialligo, Campbell, Ainslie, Hackett, Watson, Narrabundah, and Gungahlin. Residents would also welcome a ban on light aircraft, helicopter and Government VIP jet overflight of the Canberra and Queanbeyan Noise Abatement Areas at low level as none of the current noise abatement procedures apply to these aircraft movements.

Promoting Noise Sharing. Curfew 4 Canberra Inc supports the Airport’s position in relation to noise sharing. However, by developing Canberra Airport as the national/international freight hub for Australia and as the second Sydney Airport, the airport is inviting Sydney to dump aircraft noise onto Canberra residents – in effect, the airport is promoting noise sharing, and on a grand scale. This directly conflicts with the Airport’s stated principle.

Curfew for Canberra Inc is totally opposed to noise sharing with Sydney Airport. If the Airport wants to sustain its policy of noise sharing, then it needs to withdraw its stated objective of becoming the Australian freight hub and second Sydney Airport.

Claim of 99.5% Protection for Canberra and Queanbeyan Residents

‘Currently, 99.5% of Canberra and Queanbeyan residents are protected from significant adverse aircraft noise’, PDMP, p 77.

This statement is clearly wrong and is not supported by any scientific evidence. Counting residents who live directly under flight paths is not a scientific measure of 'significant adverse aircraft noise'.

There is no definition of '*significant adverse aircraft noise*' offered, so who is protected from what and to what degree is indeterminable. Some resemblance of a definition is offered at p 81 –

'to force the airlines to fly around the suburbs of Canberra and Queanbeyan at great cost (and increased greenhouse emissions) to protect the community from 55-65 dBA of noise per jet overflight'.

Presumably, this 'definition' refers to 65 dBA being the maximum allowable noise level in daytime (7 am to 7 pm) and 55 dBA the night noise level (7 pm to 7 am). It should be noted that in this clayton's 'definition' there is no maximum number of noise events per day, nor any variation or accommodation for low background noise levels. If the Airport clayton's definition is accepted, there should be plans showing where the 65 and 55 dBA contours for the noisiest aircraft in the ANEF falls over suburbs. Such modeling would need to be confirmed by actual noise measurement.

Using Figure 11.8 Single Event Contour – B737-400 - from the PDMP, extrapolation suggests that the eastern edge of Hackett (a north Canberra suburb abeam the runway 35 departure flightpath) should receive around 50 dBA of aircraft noise from a B737-400.

Noise readings have been taken recently over January and February at Hackett. These readings indicate that B737s expose North Canberra residents to noise levels of up to 67 dBA, propeller-driven light aircraft to 72 dBA, and helicopters to 74 dBA. Background noise between 11 pm and 6 am is less than 30 dBA.

Watson, Hackett, Ainslie, Campbell, Pialligo, Narrabundah, Queanbeyan and Jerrabomberra residents are regularly subjected to aircraft noise over 65 dBA, let alone 55 dBA at night, based on today's aircraft movements.

For the projected increase in movements to a 24-hour basis, the current situation will simply worsen significantly with no respite at night. The Airport claim that 99.5% of residents are protected from '*significant adverse aircraft noise*' cannot be judged because of insufficient, scientific information in the PDMP to make an informed decision, but seems to be significantly wrong on the Airport's clayton definition. At the projected movement rates on a 24-hour basis, the present situation will worsen significantly.

Canberra and Queanbeyan Noise Abatement Areas

The Canberra and Queanbeyan Noise Abatement Areas do not encompass North Watson, Gungahlin suburbs of Harrison, Amaroo and Forde plus parts of Jerrabomberra and Queanbeyan. The noise abatement zones are a voluntary measure and if the pilots chose not to abide by them, then there is no enforcement action taken against the airline or pilot by Airservices Australia for the breach. The noise abatement zones do not apply to the VIP fleet. They offer no certainty to the community against noise relief and based on 2006 census data and 2.5 people/residence, far more than 0.5% of the region's

residents are located outside the noise abatement zones and are exposed to aircraft noise today.

Noise Impact Assessment. The noise abatement areas offer no effective protection from aircraft noise as they are arbitrary lines on a map and noise pays no heed to these lines. In relation to the current noise abatement areas, total noise protection to residents does not exist. The noise abatement areas are no substitute for a proper noise impact assessment.

Curfew 4 Canberra Inc recommends that the airport recalculate the number of residents who live outside the noise abatement areas to reflect today's location of houses using GIS data and reflect the true figure in the PDMP.

OTHER AIRCRAFT NOISE CONCERNS

There are other areas of concern in relation to aircraft noise that clearly impact on the region.

Temperature Inversion. Canberra experiences frequent temperature inversions because of its tablelands topography. When aircraft are below the inversion, noise effects can be exacerbated by reflection off the inversion and aircraft noise is channelled between the inversion and surface.

Jet Noise Linked to High Blood Pressure. A European Commission-funded study has found that exposure to night-time aircraft noise is a major health issue because of the increased risk of developing high blood pressure -

<http://www.newscientist.com/channel/health/mg19726433.400-aircraft-noise-poses-a-health-risk-for-sleepers.html>

The co-author of the report, Lars Jarup, advises that the best solution to cutting the noise is to restrict night flights. Later this year, the World Health Organisation will finalise guidelines for restricting aircraft night noise exposure.

Required Navigational Performance (RNP) operations. The RNP approach is a 3 degree offset approach/departure using GPS. Currently only the 737-800 Qantas aircraft are technically able to use RNP approach. Based on data collected since April 2006 by Air Services Australia, only 30% of these flights use RNP when making an approach on the southern runway. With only two Qantas 737-800 planes arriving into Canberra each day, the noise respite for the community is negligible. This technology is not available in older planes (which are typically freighters) so this technology will provide negligible respite for the Canberra/Queanbeyan community, particularly at night. Curfew 4 Canberra Inc believes that the proposed 15 degree offset approach in the draft ANEF will be rarely used, like the current 3 degree offset due to the type of aircraft using Canberra Airport. Moreover, the ILS minima for runway 35 are lower than for the RNP, so pilots will favour the straightforward ILS approach offering lower minima.

Use of Noise Abatement Departure Procedure 1. The NADP1 take-off procedure is utilised at Sydney Airport as a noise abatement procedure. The aircraft departure gradient is steeper and aircraft are higher for the first 10 kilometres or so of the departure. If the Airport has a goal of minimising aircraft noise for departing aircraft, Curfew 4 Canberra Inc would like to see NADP1 introduced.

Runway 35 Takeoff Roll Point. Some domestic aircraft roll from the runway 35 landing threshold. If they rolled from the end of runway 35, they would be higher, earlier, reducing aircraft noise over North Canberra. Curfew 4 Canberra Inc suggests that aircraft taking off on runway 35 should use the full length to minimise aircraft noise on the departure path outside the Airport perimeter.

Movement of the Runway 35 Landing Threshold (PDMP 6.6). The PDMP proposes to move the runway 35 landing threshold back to the end of the runway. This means that planes will be approximately 20 metres (60 feet) lower over Jerrabomberra on arrival and thus will increase the noise for Jerrabomberra residents. Curfew 4 Canberra Inc is strongly opposed to any shift in the runway 35 landing threshold. In the past, the Airport has made unconditional commitments to the community that the landing threshold would not be moved from its current location. The current, available landing length does not impose operational limitations on aircraft landing runway 35, so it is an insignificant issue. We are appalled that the Airport is now choosing to renege on a prior, unconditional commitment.

Need for a Curfew

The significant increase in aircraft movements involving 24-hour/day operations and larger, noisier aircraft at night will grow aircraft noise pollution proportionately. By substantially enlarging its noise footprint into the community, Canberra Airport is effectively moving closer to and encroaching on residents' peace and quiet, and providing no respite from aircraft noise. The ultimate movements at Canberra approximate those currently at Sydney; yet Sydney has had a curfew since 1963.

'A curfew is not in the best interests of the community. It is an integral part of this Master Plan that Canberra International Airport does not have a curfew for the length of this Master Plan. This is the case irrespective of whether noise sharing is the outcome.' PDMP, section 11.1.

Many people in the community are outraged that Canberra Airport purports to know what is in their best interest, when there is no evidence to support this claim. Many residents of Canberra and Queanbeyan have Canberra Airport as a neighbour because they live under or adjacent to the flight paths. How much consideration they receive is clearly evident from the above, arrogant and insensitive statement.

The significant increase in projected night movements involving larger, noisier aircraft, the relatively high jet noise levels against the low level background noise, the lack of respite from aircraft noise, and the increased health risks combine to make the introduction of a curfew a necessity. Proactive action is needed before the problem develops necessitating remedial action arising from residents' complaints.

Curfew 4 Canberra Inc recommends that the Minister for Infrastructure Transport, Regional Development and Local Government immediately impose an 11 pm to 6 am curfew on Canberra Airport to provide certainty to the community that we will be able to sleep without the intrusion of aircraft noise.

POOR EVIDENCE BASE

The PDMP lacks a lot of detail in many areas and contains many factual inaccuracies that need to be corrected and/or independently validated.

'They [Canberra and Queanbeyan residents] are not overflown by jet aircraft (except at higher altitudes)' incorrect statement, PDMP, p 77.

Jet Overflight of the Canberra Noise Abatement Area (PDMP p 77). The above claim is simply not true. North Canberra residents are regularly overflown by VIP jet aircraft at circuit height of about 1,000 feet. Jerrabomberra residents are continuously overflown by jet aircraft due to the runway 35 centreline running down the western side of the suburb. This claim should be withdrawn in full.

Depiction of VIP Aircraft Circuits (figure 11.7). The same VIP jet circuits are not depicted in figure 11.7 and should be included.

Helicopter Base at Police Complex on Majura Road. A helicopter base has been established at the Police Complex on Majura Road about 5 kilometres north of the runway 17 threshold. The Southcare helicopter base is also located at Hume. Helicopters operating from these bases regularly overfly residential areas of Canberra/Queanbeyan traversing to and from western Canberra and areas of NSW. These helicopters are the noisiest aircraft overflying the region and do not appear to have been factored into the PDMP. They should be included as they should be considered part of the aircraft noise profile of Canberra Airport.

Light Aircraft Overflight of Suburban Areas. Light aircraft routinely overfly residential areas exposing residents to aircraft noise in excess of 65 dBA. They can be routed away from residential areas and this needs to be included in the PDMP.

High Noise Corridor. As with past master plans, the PDMP persists in advancing the concept of a high noise corridor. This has been rejected previously by the NSW Government Queanbeyan Land Release Inquiry as a land planning instrument and the Canberra Spatial Plan.

Curfew 4 Canberra Inc recommends that every reference to the High Noise Corridor in the PDMP be removed.

CLIMATE CHANGE AND OTHER ENVIRONMENTAL IMPLICATIONS

The PDMP presents as though no concerns existed for the implications of climate change in relation to the aviation projections. The North Canberra Community Council response has provided a well-argued discussion of the environmental issues and is strongly supported. The Australia Institute has also published sound research showing the very significant consequences of growing emissions from the aviation sector and on the ACT Climate Change Strategy. Yet, the Airport has sound, 'green' credentials in the construction of commercial, non-aviation facilities, but these have not been applied to the aviation business.

Freight Hub Concept

The ‘just-in-time delivery’ airfreight concept used by the Airport to justify establishment of the freight hub is being overtaken as climate change costs are assessed by logistics organisations. The holding of stocks at regional depots, delivered by less greenhouse gas intensive methods and thus lower costs, seems likely for all but very high value, time critical/perishable cargo.

The freight hub concept will exacerbate climate change problems. Positioning the national/international freight hub at the least important node in the distribution system is contrary to best practice for sustainable transportation. Additionally, the majority of airfreight is moved on passenger aircraft utilising spare capacity in the cargo/baggage holds. Sydney is the prime Australian domestic and international airport. If Canberra became the specialist airfreighter aircraft hub, then freight operations would be fragmented losing economies of scale.

Curfew 4 Canberra Inc recommends that the Federal Government economic and transport authorities assess whether positioning the national/international freight hub at Canberra Airport is in the best national interest for sustainable logistic and transportation systems.

ECONOMIC GROWTH AND BASIC PLANNING ISSUES

Promoting the Economic Growth of the Region. The PDMP claims ‘to promote the future economic growth of the Region’ (section 2.2 Conclusion, p 22). In past master plans, the Airport has made similar claims about being a promoter of growth, but significant numbers of jobs established in the airport precinct have simply been relocated from other areas of Canberra. In the case of the freight hub/second Sydney Airport, Curfew 4 Canberra Inc believes that jobs would be transferred from Sydney and that any economic benefit for the region would be negligible.

‘Canberra Airport is choking on its own development.’ Wag from Curfew 4 Canberra Inc.

Past Unfettered Development. The unfettered development of commercial office and retail space at the Airport has drawn potential development from the Canberra Town Centres and Queanbeyan to their disadvantage and added pressure on transportation systems. Moreover, the resulting traffic congestion and chaos around the Airport has had to be rectified at significant cost to the ACT taxpayer.

Curfew 4 Canberra Inc believes that commercial, non-aviation development at the Airport should be subjected to the same regulations and planning authority as for the surrounding areas.

Purported Economic Benefits

The purported economic benefits of the PDMP are not detailed in the PDMP, risks are not assessed nor is the perceived benefit to the regional community identified. The PDMP presents as an opportunistic, self-serving, *privatise the profit, socialise the cost* scheme.

Curfew 4 Canberra Inc believes that there is not enough information to make a considered decision on the claim of promoting the future economic growth of the region, or of purported nett economic benefits to the Canberra region.

Curfew 4 Canberra Inc recommends that a triple-bottom line analysis of the proposed expansion be provided in the PDMP.

CONCLUSION

The Canberra Airport lease has 89 years to run. If the PDMP is approved in its current form, then it will be extremely difficult to reverse or amend the decision subsequently. The consequences of a poor decision will last for a lifetime. The fundamental issue is to decide the required role of Canberra Airport within the community.

The current role of Canberra Airport is as a regional airport servicing a population of about 500,000 people. International VIP and Defence aircraft movements occur occasionally. Upgrading the role of Canberra Airport will add significantly to the social and environmental costs - aircraft noise, road congestion needing taxpayer upgrade, and land quarantined from development. Moreover, greenhouse emissions will increase and, to achieve climate change targets, other industries will need to reduce their emissions even more to subsidise aviation. Irrespective of the many difficulties associated with building new Airports, the NSW Government is unlikely to support the second Sydney Airport being sited 300 kilometres from Sydney, outside the Sydney Basin and the jurisdiction of the NSW Government.

From a resident's perspective, the time of day of aircraft noise events is also important. What may be tolerated through the day will not be tolerable in the late evening or sleeping hours.

The need for and location of a national/international freight hub is a matter of national policy. There are other options on major highway and rail links between Sydney and Melbourne/Brisbane for a freight hub, placing it centrally on a major distribution route, making it best practice.

'We need to work with Canberra international airport and the community in order to maximise and optimise opportunities for expansion of our economic base and of industry. The airport will be pivotal in this regard - and, over time, more and more so'
ACT Chief Minister, Legislative Assembly, 12 February 2008.

Curfew 4 Canberra Inc agrees that the Airport is an important part of the region's infrastructure, serving the needs of the region's residents. Nevertheless, it also needs to be recognised that a lot of the past and current development has simply relocated functions from other areas of Canberra. There is nothing in the PDMP to sustain the claim that the Airport is pivotal to the future ACT economy. Nor is there in the PDMP any expectation that significant revenue from a freight hub or the second Sydney Airport would find its way to the ACT general economy.

The contention that development of Canberra Airport as a freight hub and second Sydney Airport is pivotal to the future ACT economy is simply not supported by any evidence. There is no cost benefit analysis or supporting discussion in the PDMP to reach such a conclusion.

The many residents already subjected to aircraft noise are aware that the situation will worsen if the PDMP is approved, as will the road traffic congestion. Moreover, the shortcomings of positioning the national freight hub at the least important node of the distribution system and the second Sydney Airport 300 kilometres from Sydney are readily evident and unlikely to be supported by the NSW or Federal Governments. These aspects of the proposal need to be withdrawn from the PDMP. If the freight hub/second Sydney Airport proposals are withdrawn, there is no need for a parallel runway as movements will never reach that level.

A curfew also needs to be imposed now to protect residents from the prospect of other similar schemes to exploit the lack of a curfew in the future. This will also ensure that the airport and businesses at the airport have security when planning for the future, whilst keeping the community interests in mind.

Enhancement of the current role of Canberra Airport as a regional airport by adding other direct services to domestic airports, and to Pacific and East Asia airports would be accepted by residents as long as an effective curfew was in place.

Canberra and Queanbeyan residents value the peace and quiet of their suburbs; once it is lost, it will be gone forever.

Curfew 4 Canberra Inc
www.curfew4canberra.org.au