

**Curfew 4 Canberra
Submission on Green Paper, National Aviation Policy
27 February 2009**

C4C welcomes the Green Paper's recognition that it is important to limit the impact of aircraft noise at night. However, we are disappointed that the Green Paper does not recognise the need for a night time curfew at Canberra Airport, C4C's main arguments for a curfew remain current:

- Canberra's peace and quiet is highly valued by its residents
- Proposed night time aircraft noise poses a major public health risk
- Current noise protection measures are grossly inadequate for the proposed increase in noise footprint
- There is inequity in dumping night time aircraft noise in Canberra that would not be allowed in Sydney.
- No cost benefit analysis has been conducted to justify the changes in aircraft operations that will result in massive noise intrusion on the Canberra community.

Full supporting details for these arguments are found in our submission of June 2008, and we will not repeat them in this submission. Nevertheless, they form the basis for our continued campaign for a night time curfew at Canberra airport.

New Developments

Canberra Airport has recently renewed its proposal for a substantial change of use to its airport operation, with the release of its revised Preliminary Draft Master Plan in February 2009. It again seeks to establish a freight hub, which would introduce significant numbers of jumbo jet freighters to Canberra's night skies. These services would be to meet the freight needs of Sydney, while avoiding that city's night time curfew.

This example shows how the growth of an airport around an existing urban population can contribute to problems associated with aircraft noise, and we do not consider that the Green Paper adequately addresses this scenario (see page 92 where only the opposite scenario is mentioned).

Night Time Aircraft Noise is a Public Health Issue

C4C would like to see aircraft noise at night recognised as public health issue. Our submission of June 2008 referred to the World Health Organisation's forthcoming guidelines for restricting night noise exposure, and it is disappointing that the work of this eminent body is not mentioned in the Green Paper's chapter 10 on Noise Impacts.

We simply want our sleep protected from aircraft noise. A crucial fact for inclusion in any National Aviation Policy is the noise level at which sleep disturbance begins to occur.

We Want Certainty

As outlined in our previous submission, a night time curfew at Canberra airport would provide certainty for residents and business alike. The 'other measures for reducing noise impacts' suggested in the Green Paper do not provide certainty, and C4C does not support strategies that would involve the community in ongoing disputation with Canberra Airport over aircraft noise at night (eg caps, quotas, insulation). The process of challenging airport Master Plans is demanding of community time, energy and resources. Any comparison of Canberra Airport's and the community's resources shows how unfair this process is.

Information Does not Reduce Noise

C4C welcomes the improvement in information about aircraft noise. For example, a Webtrak system has come online in Hackett since the publication of the Green Paper. This confirms that our community is already subject to daytime aircraft noise in excess of 65dB from existing aircraft, the largest being 737s, and only confirms our fears that night time noise from the larger jumbo jet freighters will be at levels disturbing to our sleep.

We want to make it very clear that we do not consider improved information and better community education to be measures to reduce noise impacts. All the best 'information-sharing and better education' about jumbo jet freighters at night will not change the fact that their noise footprint will disturb our sleep.

A good example of this is the Green Paper's diagram on page 194 showing how aircraft have become less noisy over the last 50 years. Interesting information, but what is missing is the information about the noise level at which sleep disturbance occurs – well below the 90dB mentioned as the least noisy aircraft.

Community Consultation

C4C welcomes the Green Paper's commitment to improve community involvement and consultation. However, this needs to be genuine and effective. The case of Canberra Airport exposes some of the Green Paper's assumptions about the interests of airports. In C4C's experience their community consultation has been extremely tokenistic. If they were serious about taking steps to 'minimise the impact of noise of the community' (page 195) they would not be developing a freight hub involving jumbo jets at night, and defending the adequacy of the noise abatement areas. The community expects protection by government from this sort of unfettered development.