



27 February 2008

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

Dear Sir/Madam

Preliminary Draft - Canberra International Airport Master Plan 2008

The Environmental Defender's Office of the A.C.T welcomes the opportunity to provide comment on the Canberra International Airport's (hereafter referred to as the Canberra Airport) preliminary draft Master Plan 2008.

It is noted that the draft Master Plan proposes a number of significant changes to the operation of the Canberra Airport which are of concern to this Office including:

- establishing Canberra Airport as a 24 hour freight hub, which may involve domestic overnight freight operating through Canberra, with Sydney freight transported by road, as well as 24-hour operations by international freight airlines;¹
- establishing Canberra as Sydney's second airport with a role in 'meeting the needs of the Sydney basin', including a 24-hour domestic and international flight operation and overflow passenger service;² and
- a significant increase in the frequency of flights and the size of aircraft.³

The proposals in the draft Master Plan are of particular concerns because of the:

- i) impact on greenhouse gas emissions as a result of an increase in flights; and
- ii) increased noise pollution as a result of an increase in aircraft.

In addition, this Office is of the view that more stringent statutory planning and environmental controls should be placed on the airport, to ensure that aviation emissions are appropriately controlled in any future developments.

¹ The draft Plan states that one of its key elements is 'the development of a critical national aviation infrastructure asset as the only 24-hour 747 and A380 capable airport between Melbourne and Brisbane' (Preliminary Draft - Canberra International Airport Master Plan 2008, p 9). The draft Plan states that 'with restrictions on the size of the Sydney Airport site and its curfew, Canberra is well placed to act as an Australian, trans-Tasman and international freight hub. This may involve domestic overnight freight operating through Canberra, with Sydney freight transported by road, as well as 24-hour operations by international freight airlines.' (p 31)

² The draft Plan states that one of its key elements is its 'role as a passenger and freight hub for traffic unable to access Sydney Airport:- catering to overnight freight during the Sydney curfews and to overflow due to capacity constraints on Sydney in the longer term' (op cit 1, p 9)

³ The draft Plan forecasts the annual aircraft movements at Canberra Airport up to 2028. On the high range forecast it estimates that aircraft movements would increase from 81, 732 movements per year as at 2005/06 to 180, 551 movements per year by 2028 (op cit 1 p 42)

i) Impact on Greenhouse gas emissions

This Office is very concerned that the significant increase in aircraft traffic forecast in the draft plan will give rise to an unacceptable level of greenhouse gas emissions. With society now recognising the urgent need to address the problems of climate change, proposals which will increase emissions must be carefully scrutinised.

In the ACT the Government has set a long-term target to reduce ACT's greenhouse gas emissions by 60% on 2000 levels by 2050.⁴

It is noted that aviation contributes to only 2% of global CO₂ emissions. However, existing and projected figures on the likely rises of emissions forecast a rapid rise of emissions from aviation, which means that the contribution of greenhouse gas emissions from the aviation industry will have a large impact on overall greenhouse gas emissions and cannot be ignored.

The United Nations Framework Convention on Climate Change has found that international aviation emissions from developed countries rose by 65.8% between 1990 and 2005.⁵ At a local level, the Australia Institute has recently published a research paper which undertook to project the ACT's passenger-related aviation emissions over the period 2005-2050.⁶ In this report the Institute found that between 2005 and 2050, emissions from aviation are expected to rise by more than 250%. By 2050, aviation emissions are projected to be twice as large as the ACT's total emission allowance, accounting for 216 per cent of its permitted emissions.⁷

The Report concluded that 'the implication of these findings is that if CAG's plans for Canberra Airport are realised, and aviation emissions are included in the accounting framework under the ACT Climate Change Strategy, the Territory's emission reduction target is likely to be unachievable.'⁸

In light of these findings this Office is of the view that the significant increase in aircraft movement proposed in the draft Plan will give rise to unacceptable levels of emissions.

In addition to the concern for the increased emissions resulting from an increase in aircraft traffic, the Office is concerned that the proposal to establish Canberra Airport as Sydney's second airport will give rise to further unnecessary emissions. This proposal will see passengers and freight destined for Sydney arriving in Canberra, as a result of Sydney's curfew or because of its limited capacity. This means that further transportation will be required for the passengers or freight to end up at their desired destination, ie Sydney. This proposal makes little environmental sense as it will increase the transportation time for the passenger or freight in many instances, and consequently lead to greater emissions. For example, a passenger flying from Los Angeles will fly over Sydney before flying on to Canberra, then returning to Sydney (either by plane on another day after the Sydney curfew is lifted, or by another form of transport).

ii) Increased Noise Pollution

⁴ Department of Transport and Municipal Services, 2007, *Weathering the Change: The ACT Climate Change Strategy, 2007*.

⁵ United Nations Framework Convention on Climate Change, FCCC/SBI/2007/30, accessed at <http://unfccc.int/resource/docs/2007/sbi/eng/30.pdf> at p15 (accessed on 27 February 2008)

⁶ A Macintosh & C Downie, *Aviation and Greenhouse Gas Emissions in the ACT*, Research Paper No 50, January 2008

⁷ Op cit 6, p 2

⁸ Op cit 6, p 2

It is noted that the Canberra Airport currently operates 120 flights per day.⁹ It is projected by consultants engaged by the Airport's managers that by 2050 more than 700 aircraft will arrive and depart Canberra Airport every day.¹⁰

The impact of this very large increase in overall aircraft numbers combined with the timing of aircraft movement (that is the significant increase in night time aircraft movements as a result of establishing Canberra airport as a 24 hour hub) gives rise to very significant noise concerns.

Those noise levels that may be viewed by residents as acceptable during daytime hours may be unacceptable during nighttime hours. Without the daytime background noises, aircraft noise at nighttime is much more likely to affect residents. This, combined with a significant increase in aircraft traffic during nighttime hours, thus providing no respite from aircraft noise, is likely to be unacceptable to many residents.

The draft plan notes that currently complaints concerning aircraft noise arise from residents living in Jerrabomberra (especially the 600 households inside the High Noise Corridor); North Canberra (particularly Hackett, Campbell, Watson, primarily due to small general aviation aircraft using Runway 12/30); Carwoola; The Ridgeway; Wamboin; Sutton; Pialligo; Tuggeranong; and Gungahlin.¹¹ Clearly it is not only residents in the High Noise Corridor who are affected by aircraft noise.

iii) More stringent statutory planning and environmental controls

This office notes that the Airport is not subject to the strategic or regulatory planning framework of the ACT. It is the view of this Office that to ensure appropriate environmental controls are exercised, the airport should be subject to the regulatory framework governing the ACT.

This Office support the conclusion reached by the Australia Institute that 'new airport developments and airport master plans should also be subject to formal statutory environmental assessment procedures that require the evaluation of the greenhouse implications of the relevant actions and related increases in aviation traffic.'¹²

This Office notes that the draft Plan outlines ten objectives, at pages 11 to 14. The Office is concerned that objectives 4 to 9 focus on increasing aircraft traffic to the detriment of environmental considerations. The large scale increase in aviation traffic which would occur in order to achieve these stated objectives puts it at odds with the first stated objective of ensuring that the airport is developed in an environmentally sustainable manner.

To minimise the impact on greenhouse gas emissions and to reduce the noise pollution this Office is of the view that the Plan should adopt the following measures:

- a night time curfew on aircraft movements. This would assist in addressing the greenhouse gas emissions through a decreased number of aircraft and also assist in addressing the noise concerns. This would be consistent with other major airports in Eastern Australia;
- not develop the airport as the second Sydney airport; and
- not develop the airport as a 24 hour freight hub.

⁹ Op cit 1, p 41

¹⁰ Op cit 6, p 1

¹¹ Op cit 1, p 88

¹² Op cit 6, p 2

In addition the Office is of the view that there should be increased planning controls over the airport.

Please do not hesitate to contact me if you would like to discuss this submission further.

Yours sincerely

Kirsten Miller
Principal Solicitor