

Ms Alison Howship
Canberra International Airport
1 / 2 Brindabella Circuit
Canberra Airport ACT 2609

Public Comments on preliminary Canberra International Airport Draft Master Plan (Draft Plan)

Thank you for the opportunity to comment on the above Draft Plan. My substantive comments are enclosed.

Overall I found the Draft Plan strong on rhetoric and advocacy for economic development and unrestricted operating conditions but very short on the necessary detail to address a range of key implications arising from the proposed developments. These include:

- the need for effective and ongoing consultation with local communities to ensure that the existing quality of life is maintained;
- the need for integration of the Airport proposals with the broader strategic requirements of the ACT and surrounding regions; and
- adequate assessment of the potential impacts and risks associated with the proposed increased Airport operations, in particular concerning increased noise and external traffic and broader environmental and ecological impacts.

I also have concerns with the overall tone of the Draft Plan. While failing to provide essential detail to justify the Airport's position on a number of key aspects such as those mentioned above, the Draft Plan in a number of sections presumes, and in some instances even states, that its position is what is in the best interests of the community. This is unacceptable for a consultation document which is supposed to present the facts for the community to draw its own conclusions.

Given the above shortcomings I cannot support the Airport proposals as they stand and recommend that the deficiencies outlined in my comments need to be addressed immediately before further consideration by the general public and the relevant Government Minister.

Yours sincerely

Rob Ferguson

27 February 2008

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Vision and Objectives

Page 23 of the Draft Plan states - “we see the local ownership of the Airport as an opportunity to better integrate the Airport’s development and operation with local and regional priorities.” If this is the case, why is this not reflected as a specific priority in the Draft Plan’s Vision or Objectives? It is noted that this sentiment is not addressed directly in any of the Draft Plan’s Objectives or key elements which currently focus on the Airport’s operational requirements and the immediate vicinity of the Airport. There is no mention of an objective to develop the Airport to meet the needs of the broader Canberra community and to develop in balance with the requirements of the broader community.

The Draft Plan also notes that the development of the Airport is required as a critical national aviation infrastructure asset to overcome the existing shortfalls in capacity and operating hour restrictions in other airports, primarily Sydney. Surely this must be the prime responsibility of the appropriate levels of Government to address a long standing national infrastructure problem. It is not appropriate for a private developer to appear to dictate how these national issues will be addressed. It is short sighted to justify the development of the Canberra Airport as a solution to the long standing national aviation problems on the eastern seaboard.

Integration with Local Planning Strategies

While strong on rhetoric there is little evidence in the Draft Plan of real commitment to integrating the Airport’s developments with the requirements of the ACT and surrounding regions.

There is little detail on how the Airport operators are specifically contributing to the longer term planning in the ACT and surrounding regions. The ACT Government White Paper repeatedly states the importance of the Airport to the economic development of Canberra but there are few examples in the Draft Plan on how the Airport will contribute to the rational development and control of impacts in the region. Page 26 of the Draft Plan states – “Canberra International Airport has been recognised by the ACT Government as a critical piece of infrastructure to the ACT and the surrounding region, and the ACT Government has further acknowledged that it must be encouraged as well as integrated into the urban form of the city.” There is no evidence in the Draft Plan of how the ACT Government and the Airport Authority are working together to achieve these requirements. In particular the focus in the Draft Plan is on development with very little detail of how the expanded operations of the Airport will be consistent with, and integrated with, the current urban form of the city. The whole focus appears to be on changing the face of Canberra, through the transport infrastructure and associated economic development opportunities, with little regard given to addressing integration with the existing urban amenities and quality of life.

There are, however, disturbing examples in the Draft Plan of how the Airport’s developments are in contradiction to the overall strategic planning requirements of the Act and nearby regions. The Draft Plan completely ignores the ACT greenhouse gas reduction strategies that would be significantly impacted by such resource intensive developments proposed by the Airport. The proposed Airport developments would appear to be completely at odds with any energy saving

targets proposed by Government greenhouse gas reduction strategies. Given the growing national and international concerns with greenhouse gas emissions and the need for emission reduction programs, this is major omission from the Draft Report and needs to be specifically addressed. There is no indication that this issue has even been considered by the Airport Authority or the ACT Government.

Additionally, Page 27 of the Draft Plan quotes from the Canberra Spatial Plan as follows – “In order to protect the Airport as a significant transport asset for the region, its operations need to be unconstrained by the potential limiting effects of residential development where airport noise would impact on residents.” This is either selective quoting from the Spatial Plan or reflects an extraordinary bias towards one form of economic development at the Airport over the ongoing residential development needs. The ACT Government has acknowledged that the current housing crisis is impacting on the immediate and longer term employment and economic development prospects of the ACT and the need to release more residential land to help address this crisis. The bias in the above statement to the Airport development would appear to be extremely short sighted and limits the options for a more integrated longer term strategic development of the broader business and social needs of the ACT and surrounding regions. This is also contrary to the above statement that the Airport should be integrated into the urban form of the city.

The Draft Plan also includes the following statement – “Although the Airport consults regularly with the ACT Government, the Airport is not subject to the planning policy or requirements of the ACT Government or ACTPLA.” This statement underscores a significant planning problem for the ACT given the stated importance of the Airport to future ACT economic development and the fact that it’s not required to abide by ACT planning requirements. There is no detail or specific commitments in the Draft Plan for the Airport to integrate its developments with the longer term strategic requirements of the ACT or surrounding regions. This is a significant flaw in the accountability of the Airport’s future operations and the Draft Report should address in more detail how it will provide for and address these commitments.

Passenger projections

The Draft Plan strongly advocates the retention of 24 hour operating conditions as essential to achieving its proposed developmental goals. However, the factors to deliver the expected increased passenger numbers, such as redevelopment of the Canberra Airport terminal infrastructure, capacity to take up new passengers through expanded cheap air services, expansion of new international, national and regional routes and capacity to take flight and passenger overflow from Sydney airport would not be significantly affected by a curfew. The Draft Plan notes that it’s the absence of the above factors in the past that has prevented an expansion of passenger numbers. These passenger increases have already occurred in other city airports that are subject to some form of curfew or other operating restrictions. Given the information in the Draft Plan Canberra Airport is well placed to substantially increase passenger numbers even if a night curfew was in put in place.

Air Freight developments

The development of a 24 hour freight hub at the Canberra Airport is one of the major changes proposed under the Draft Plan with potentially the greatest impacts on the surrounding community. Yet the detail provided on these developments is scant at best. There are no details on the extent of freight handling infrastructure required, the extent and type of projected increased employment opportunities, the expected quantities of road freight that will have impacts on supporting road infrastructure around the airport and in the wider ACT. The brief figures on expected truck movements to and from the freight hub provided separately on the Canberra International Airport Web Page appear insufficient for the extent of proposed freight operations and there is no supporting detail on how these figures were derived.

Apart from the expanded freight operations there is also mention in the Draft Plan of establishing a significant aircraft maintenance centre. Again there are no details on the operational implications in terms of infrastructure needed, transport services, additional aircraft movements, etc.

Despite the lack of supporting evidence the Draft Plan restates the demand that the 24 hour operating conditions must remain in place to allow the freight hub to develop and expand without making any attempt at cost benefit or socio economic analysis. This is a major shortcoming and needs to be addressed in more detail before the Draft Plan can be considered in any way adequate.

External Road Access

It is disingenuous for the Draft Plan to imply that the increased residential traffic coming from Gunghalin via Horse Road to access other parts of Canberra is the sole source of traffic congestion around the Airport. Surely the growing developments at the Airport are a significant contributing factor in attracting traffic to the area, given the number of businesses already at the site that involve daily employee commuting. This is a further example in the Draft Plan of the Airport disowning any of the associated problems with the Airport's developments and leaving the responsibility for solutions to the ACT Government.

Also the extent of external road access modifications discussed in the Draft Plan do not appear adequate for the scope of projected increases in Airport passenger numbers, flight and freight operations and associated business developments, particularly when considered in conjunction with further residential developments underway or proposed in the Kowen, Gunghalin and Queanbeyan areas. Page 60 of the Draft Plan states "It is not expected that road access will be an issue once Stage 1 of the road upgrades are complete." Stage 1 only addresses enhancements to the immediate vicinity routes of Majura Road and Piallago Drive and does not appear to take account of the broader impacts of increased road freight from the freight hub or the increased traffic to and from the expanded Airport developments that would impact on other transport routes across ACT and in nearby NSW.

In this regard, what further planning has been undertaken, or will be undertaken, by the Roundtable to ensure appropriate traffic access through the broader area. In particular, it should be clearly stated whether consideration has been given to further developing the previously proposed Monash Drive through North Canberra as this will have major implications for residents in the those suburbs that are already under significant threat of excess noise from the proposed increased aircraft operations.

Aircraft Noise

The residents of Canberra and Queanbeyan have every right to take issue with the statements in the Draft Plan that suggest that the community only has the choices of rejecting residential developments near the flight paths or cop noise sharing. It is also inappropriate for the Draft Plan to presume that it is not in the community's best interests to have a curfew at the Airport. **It is entirely inappropriate and disturbing for the Airport to dictate terms on the options available to the community for quality of life in this region and suggests that its operators have little intention of integrating the Airport's operations into the broader strategic requirements of the ACT and nearby regions. It is not the Airport's place to take this position concerning the broader community and both the ACT and Federal Governments should take particular note of this when considering the appropriateness of the Draft Plan.**

This approach is also a smokescreen for advocating no restriction on Airport operations while failing to address in detail the real implications of increased noise across the ACT and Queanbeyan regions from the proposed increased Airport operations. Again this is an example of the Airport operators seeking to lay blame elsewhere for the repercussions of its proposed developments whilst not adequately addressing the potential risks of its proposals. Statements in the Draft Plan that reject any curfew on the Airport's operations, and that a curfew should not be considered even if noise sharing were to eventuate, indicate that the Airport operators have already set their position and are not prepared to consult further or change the intended scope of operations irregardless of any adverse impacts on Governments and the community.

The statements on the lack of need for a curfew are not supported by any real analysis of the impacts of the changes in proposed flight conditions, such as vastly increased night flights through freight hub operations. All the analysis presented, such as appropriate Australian Noise Exposure Forecast (ANEF) levels, appears to be based on the experience of the existing, much lower-scale operations. There is no real attempt to project these impacts onto a scenario where there is a 100 fold increase in night operations and a 2 to 3 fold increase in overall flight operations as indicated in the Draft Plan.

On the information provided it does not seem feasible that the existing confined areas of the High Noise Corridor and Noise Abatement Areas can cope effectively with the greatly expanded flight operations proposed. The Draft Plan raises the prospect of the pre-December 1995 flight paths being used outside the existing High Noise Corridor over North Canberra suburbs and east-west over the Woden Valley and Jerrabomberra as a means of noise sharing, and that a curfew would not be accepted even if noise sharing was in place. This indicates that, in the face of the Airport's determination to proceed with 24 hour operations, there is the distinct possibility of additional flight paths being required in the future. This would have unacceptable impacts on the existing residents outside the existing High Noise Corridors and be contrary to the claims in the Draft Plan.

It should be noted that the Draft Plan does not explore in any detail the prospect of this occurring nor provide a commitment that changes to flight paths outside the existing Noise Abatement Areas will not eventuate as part of its future operations. There is also no quantitative evidence presented of what community consultation has been conducted that resulted in the overwhelming conclusion stated in the Draft Plan that the community does not want the residential developments to proceed or noise share. There is also no indication in the Draft Plan of what ongoing community consultation will be undertaken, particular consultation that extensively covers those residents in the most affected areas adjoining the Airport precincts.

Environmental Management

While the Airport's Environment Strategy appears to provide a strong focus on ensuring the environmental sustainability of the Airport's infrastructure and immediate surrounding areas, the Draft Plan provides no evidence of how the broader environmental impacts of the proposed

extended operations will be addressed. The stated vision for environmental management in the Draft Plan is to “minimize the ecological impact of ongoing developments and operation of the Airport” and the quoted details from the Canberra Spatial Plan note that “ ..growth at the Airport must have regard to the need to protect significant biodiversity assets on and around the Airport.” It is therefore surprising that there is no mention of referring the proposed Airport operations for assessment under the primary Commonwealth environmental regulatory instrument, the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Given the location of the Airport on Commonwealth land and the potential downstream impacts of the Airport’s operations such as noise and increased traffic outside the confines of the Airport it would seem that this should be an essential component of the Draft Plan. Failure to mention this requirement is a significant shortcoming in the existing Draft Report and should be addressed immediately.

Comments submitted by:

Rob Ferguson

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