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Submission on discussion paper 'Safeguards for airports and the communities around them'

Community expectation – undisturbed sleep

Curfew4Canberra (C4C) speaks on behalf of thousands of residents who expect to enjoy a good night's sleep undisturbed by aircraft noise. This is a matter of public health, with clear evidence now showing a link between night time exposure to aircraft noise and poor health outcomes, such as high blood pressure. This happens even if you don't wake up (see the European Commission's HYENA study at www.hyena.eu.com, which was published in the *European Heart Journal*, 2008).

We consider that the discussion paper is grossly inadequate in its omission of safeguards to sleep. Residents of the Canberra region find themselves in a unique situation because of Canberra Airport's proposal to develop a 24-hour freight hub to provide for the Sydney freight market. This would massively increase Canberra's aircraft noise footprint at night.

Shortcomings of ANEF

The fundamental question this community wants answered is whether their sleep will be disturbed. For most people, looking to the Canberra Airport's ANEF provides no answers as it bears no relevance to the public health issue of a good night's sleep. It is essentially a planning tool.

The case of the 24-hour aircraft hub proposal highlights another shortcoming of the ANEF, which is that the airport prepares data and predictions upon which it is based, without verification by an independent authority. Airservices Australia is not required to verify or validate Canberra Airport's underlying assumptions and furthermore does not even insist on how many and where noise monitors should be located that would help produce an accurate ANEF. This has resulted in a grossly distorted ANEF. Canberra Airport's current ANEF predicts a total of 121,528 night flights per annum – or nearly 333 flights per night. However, it is clear from even the high range forecasts in Canberra Airport's 2009 preliminary Draft Master Plan that this figure bears no resemblance to reality. Such a gross discrepancy erodes the community's trust in the ANEF.

C4C would like to express its disappointment that the safeguards discussion paper makes no attempts to explain what the ANEF is. This highlights a lack of regard for communicating and understanding that pervades the aircraft and airport industry.

Shortcomings of Mitigation Measures

C4C maintains its strong preference for an aviation curfew from 11pm to 6am as the best noise mitigation measure that will protect sleep. However, we note from the Green Paper that the policy direction is not to protect Canberra's residents from sleep disturbance through a curfew. Instead, it refers to examining 'a wide range of other options for limiting the impact of aircraft noise, particularly at night.' (page 193). It is therefore extremely disappointing that these options are not outlined in the safeguards discussion paper. The paper talks about options for noise measurement and improved information, but this is simply not enough for people who stand to have their sleep disturbed by aircraft noise. We want actual safeguards and action to mitigate noise impacts in residential areas at night.

Again Canberra Airport provides a classic example. The noise mitigation measures they proposed in their 2009 Preliminary Draft Master Plan to deal with a massive increase in night time noise footprint were completely unsupported by any evidence at all. The community has no confidence in these measures, and yet the current process lets Canberra Airport get away with this trial and error approach.

We note that virtually no other major industry is allowed under government legislative planning and environmental regulation to have their strategic plans or changed operations approved without putting effective mitigation measures or offsets in place (and paying for them) to address their potential impacts. By not having these measures clearly in place, which are part of normal business practice, Canberra Airport is expecting the sort of preferential treatment and protectionist policies that governments at all levels have supposed to have abandoned long ago in trade arrangements. This is totally undermines any safeguards for communities on noise impacts.

Shortcomings in the Process

How is it possible that Canberra Airport can massively increase its night time noise footprint by proposing a 24-hour aircraft hub, and yet no proper noise or health impact assessment is required by law? Any other industry that was proposing to generate this amount of night time noise (far in excess of local noise protection laws) would be required to go through a strict evidentiary process.

We note by contrast, that Brisbane Airport's proposed third parallel runway triggered an environmental impact assessment, including a health impact assessment. It is ridiculous that such safeguards are only triggered by infrastructure projects, and not by change of usage, such as a massive increase in a night time noise footprint. The critical question is whether there is a potential significant impact on people's health, such as through sleep disturbance from aircraft noise.

The case study of Canberra Airport shows just how weak the existing process is. The evidentiary gap is extraordinary. In their 2009 preliminary Draft Master Plan, Canberra Airport has proposed a 24-hour freight and passenger hub and completely ignored the issue of sleep disturbance! They have relied on generic statements like this: 'The Commonwealth has stated that 65dBA to 70dBA is the external noise exposure level where noise begins to become intrusive...' (page 176). This level does not appear to have been published anywhere by Government. Canberra Airport has advised C4C that it is taken from a 2002 letter from the Federal Minister to the Deputy Premier of NSW. Apart from the source's lack of transparency, the level quoted bears no resemblance to the science on sleep disturbance levels. C4C considers that such misleading statements show how the current system fails to protect a community's need for accurate and independent information. Without this the community cannot fully participate in a decision that threatens to have a huge impact on their health and residential amenity.

Curfew 4 Canberra has identified the following information as crucial to the decision on the proposed 24-hour hub:

- Single event noise contour maps for each aircraft that is proposed for use during sleeping hours, showing noise contours of 50, 55 and 60 decibels at each end of the runway;
- Definition (and illustration) of a sleep disturbance zone, and an estimate of the number of ACT region residents that live within that zone.

At no time has this information been provided to the community in the course of community consultations on the 24-hour aircraft hub proposal, and the community does not have the expertise or money to produce complex information like this. A requirement to have an independent noise and health impact assessment would overcome this evidentiary gap.

Community views and interests concerning aircraft noise and aircraft operations will not be safeguarded as long as the main consultative forums at airports are run and controlled by the airport operators. This is a blatant conflict of interest. This also applies to airports controlling the process for the development, review and approval of their master planning documents that provide the basis for noise

generation and limits. There needs to be independent operation of the consultation and master planning activities for major airports that have substantial presence in and impacts on the surrounding communities.

Recommendations

We recommend that the following be recognised:

- The community has an expectation that sleeping hours will not be disturbed by aircraft noise.
- Night time exposure to aircraft noise is detrimental to public health.
- A night time noise standard should be established, respecting scientific evidence on sleep disturbance (including maximum noise levels, recognition of low background noise, and the number of noise events and amount of respite).
- Peaceful and quiet residential amenity at night time should be safeguarded from major expansions by airports.
- The provision of information is not an adequate response to people who have their sleep disturbed by aircraft noise.
- Actual and evidence-based noise mitigation measures are required when aircraft threaten to disturb sleep.
- Details of the Green Paper's proposed options for limiting aircraft noise at night should be given.
- An independent noise and health impact assessment should be required where a significant increase in an airport's usage threatens to disturb sleep.
- The ANEF in its present form is not meeting community needs.
- The ANEF should be enhanced by transparent and independent analysis, to avoid the manipulation that seems to have occurred at Canberra Airport.