

Jerrabomberra Residents Association Inc.

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Committee Secretary

Senate Standing Committee on Rural and Regional Affairs and Transport PO Box 6100
Parliament House
Canberra ACT 2600
Australia

By Online Submission

Dear Secretary,

SENATE INQUIRY INTO THE EFFECTIVENESS OF AIRSERVICES AUSTRALIA'S (ASA) MANAGEMENT OF AIRCRAFT NOISE

The Jerrabomberra Residents Association (JRA) is an active community organisation in the Queanbeyan City – Canberra region. The JRA conducts advocacy and lobbying for the particular needs of the Jerrabomberra community, at Local, State and Federal levels of government.

Jerrabomberra residents are all too familiar with the impact aircraft noise has on their daily lives. Aircraft noise has been an even greater issue for many residents since December 1995 when, at the request of the ACT Government, the southern approach flight path to Canberra Airport was changed. The 1995 change resulted in all aircraft funnelling down the western side of Jerrabomberra. The Instrument Landing System (ILS), or flight path centre line, southern approach to Canberra Airport goes from Church Creek along the western part of Jerrabomberra to the end of Canberra airport runway.

With 489 houses currently falling outside the current noise abatement area, aircraft noise is a regular concern to all Jerrabomberra residents as aircraft noise does not stay outside the noise abatement area. Planned increases to aircraft movements at Canberra Airport coupled with the absence of a night-flying curfew adds to the concerns of not only Jerrabomberra residents, but also residents from Canberra and Queanbeyan.

The JRA believe significant abnormalities have occurred in recent times on aircraft noise

forecasting in Canberra. Indeed, under current procedures privately owned airports, such as Canberra Airport, with some oversight from ASA and the Department of Infrastructure, Transport, Regional Development and Local Government (DITRDLG), self-regulate the Australian Noise Exposure Forecasts (ANEF) footprint they wish to emanate. The JRA's concern was highlighted at the Senate Supplementary Budget Estimates hearings of the Rural and Regional Affairs and Transport Committee on 20 October 2009. It seems obvious that a lack of proper ASA scrutiny exists with Canberra Airport towards ANEF footprint forecasts. Rather than proper analysis of the ANEF system, equivocal and emotive rhetoric, such as 'building homes under flight paths', is being used to influence the debate.

The JRA seeks to have three issues examined before the Senate Standing Committee on Rural and Regional Affairs and Transport into Aircraft Noise Management by ASA relating to Canberra Airport. These include:

- 1. the ANEF;
- 2. freight hub night operations; and
- 3. the need for a legislated night-flying curfew.

ANEF on Canberra Airport approaches

In early 2007, Canberra Airport released its Practical Ultimate Capacity (PUC) ANEF where they predict that by 2050 Canberra will have 282,120 flights every year, compared with 71,850 flights a year currently (2009). Such forecast would place Canberra Airport at the same flight capacity as Gatwick Airport outside London in the UK. Sydney Airport (Australia's busiest; with a population of four million and parallel runways) currently has 285,000 movements a year. Canberra Airport also proposes to have a 15 degrees 'offset approach' for 747 long haul aircraft approaching from the south, putting the 'touchdown point' back to the end of the runway and having planes 20 metres lower over Jerrabomberra.

This proposed increase in aircraft activity means the ANEF 20 contour is enlarged significantly. The enlarged ANEF 20 contour impacts on developing infrastructure, such as schools, in the Jerrabomberra Valley as existing facilities would now need to be moved much further away from Jerrabomberra to remain outside the ANEF20 noise contour based on the unachievable PUC projections endorsed by ASA.

Typically, airports provide 20-year forecasts in their master plans, not the maximum ultimate capacity an airport could be expected to cope with. The JRA is advised the PUC ANEF is not in use by any other airport in Australia. ASA technically endorsed Canberra Airport's PUC ANEF on 12 June 2008, however, no-one has been able to independently validate the data that went into the PUC ANEF as the Canberra Airport only provides its data to ASA. Canberra Airport has refused to provide the data to Queanbeyan City Council or the NSW Government for independent validation.

The JRA believes there is a need for an independent review of Canberra Airport's ANEFs. This task needs to be undertaken by an expert that has no association (both past and present) with Canberra Airport.

Freight Hub for Canberra Airport

Many community members from North Canberra and Queanbeyan made private submissions on Canberra Airport's Master Plan about concerns they had with the proposed 24-hour freight hub. Nevertheless, on 28 August 2009, the Minister for Infrastructure, Transport and Regional Development, the Hon Anthony Albanese, approved the Canberra Airport 2009 Master Plan. It is the JRA view the 2009 plan is almost indiscernible to the previous version of the plan the Minister rejected in 2008. Reinforcing this position, responses by ASA officials to questions posed by Senator Nash at the 20 October 2009 Senate Estimates hearing lacked substantive information and merely reiterated the Master Plan was Canberra Airport's responsibility.

Minister Albanese's press release of 28 August pointed out that because Canberra Airport already had night-time freight activities an expansion of night flying would have little impact on residents. The Minister's claim is subjective. Currently only two to three twin prop freight planes arrive each night. The proposal (as outlined in the Master Plan) is to replace them within 20 years with 20-25 large freight jets, and international flights, every hour between midnight and 5:00am. The PUC ANEF contours endorsed by ASA assume 334 flights every night including 15 jumbo jets. Such increased activity presents a significant change in scope and will radically change noise emissions over Canberra and Queanbeyan.

As part of Minister Albanese's decision to approve the 2009 Master Plan it was proposed that this year ASA review and consider options to concentrate aircraft noise away from existing residential areas, particularly at night. Canberra Airport and the Night Freighters group have already taken small steps to represent the appearance of taking action in consideration of community concerns. The JRA is aware of this action as we are an invited participant on the Canberra Aircraft Noise Forum. The revised option now in place is for all aircraft arrivals after 8:00pm to arrive from the north. However, not all post 8:00pm arrivals approach from the north, with many choosing to land from the south over Jerrabomberra, citing safety concerns or pilot preference. A check of ASAs Webtrak for Canberra Airport can corroborate this information as fact.

The JRA has invested many years working on various options to reduce the impact of aircraft noise on residents, particularly at night. When one considers current noise abatement zones, amended operational procedures for aircraft to land from the north after 8:00pm, and the albeit limited use of the southern runway offset approach, aircraft Captain's will continue to choose the path of least resistance and cite safety concerns or pilot preference to land from the south on the ILS at the expense of community considerations. It should be noted that Canberra experiences some of the lowest levels of night time background noise of capital city in Australia; any increase in aircraft movements, be they freight or international flights that arrive after 11:00pm and depart before 6:00am will seriously impact on the ability of a great many residents of Canberra and Queanbeyan to get an uninterrupted night's sleep.

Offsett Approach

In April 2006 ASA introduced the Required Navigation Performance (RNP) for Canberra The RNP is a curved offset approach set up to provide noise relief for Jerrabomberra residents. According to the ASA report Implementation of RNP Operations at Canberra Airport Noise Monitoring dated 11 July 2007, aircraft that are suitably equipped can be approved to take advantage of RNP operations to improve both the safety and environmental impacts of aircraft operations.

Currently, only QANTAS 737-800 aircraft can fly the RNP and take up is limited to two to three flights a day, as it is subject to trained flight crew availability and weather. Therefore, all other aircraft continue to use the runway centreline. Aviation experts advise aircraft cannot be retro-fitted with the technology that allows the 737-800 to fly the RNP.

The JRA are advised neither Virgin Blue nor RAAF 34 Squadron have applied to CASA for their respective 737-800 aircraft to use the RNP technology. We are further advised that Virgin Blue's new Embraer fleet is not RNP capable.

If more RNP capable aircraft actually flew the RNP approach Jerrabomberra residents would gain some respite from aircraft noise. However, as stated previously, this will have a little impact on night time noise on residents.

Conclusion

The JRA position is:

- 1. Canberra Airport is a regional inner city airport, albiet Australia's Capital, servicing the local community and its functionaries and should continue to work within this framework.
- 2. In the interest of Canberra and Queanbeyan communities Canberra Airport's ANEF should be subject to independent review.
- 3. The Federal Government should take action to curb Canberra Airport's want to function as a 24-hour freight hub and its wish to become Sydney's second airport with a legislated curfew between the hours of 11.00pm and 6.00am.

The JRA believe believe taking action on the points raised above will protect the interests of the Canberra and Queanbeyan communities and ensure ASA and Canberra Airport do not foist unnecessary aircraft movements and added noise emissions on the Canberra-Queanbeyan region.

The JRA is available for further consultation if necessary.

Yours faithfully

Mark Croxford President