

Kai Hansen

26 January 2009

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

SUBMISSION TO THE INQUIRY INTO THE EFFECTIVENESS OF AIRSERVICES  
AUSTRALIA'S MANAGEMENT OF AIRCRAFT NOISE

AUSTRALIAN NOISE EXPOSURE FORECASTS (ANEF)

At page 212 of the recently released National Aviation Policy White Paper the Australian Government has confirmed that it will retain the Australian Noise Exposure Forecast (ANEF) system as the national standard for land use near Australian airports. The ANEF system, properly applied, is a good planning tool as it provides protection and certainty for all stakeholders, thus ensuring the co-existence of airports and their surrounding communities. However, for the system to work ANEFs must be accurate representations of an airport's likely activity and capacity for expansion.

Unfortunately, under current rules, the ANEF system is open to manipulation by airport operators. The entire process of producing and endorsing an ANEF is 'in house' – airport operators are free to make misleading claims and assumptions that are not required to be tested by the approving authority, or any other outside agency.

An example of the system gone wrong is Canberra Airport's ANEF. This ANEF misrepresents and exaggerates the impact of aircraft noise around the airport which is seeking to stop legitimate development some 10 kilometres away. Canberra Airport's 'Ultimate Practical Capacity' ANEF has been endorsed by Airservices Australia for 'technical accuracy', however, this does not mean the noise contours presented are correct. Airservices Australia merely 'rubber stamps' the data provided by the operator of Canberra Airport – there is no impartial or independent checking of the veracity of the claims and assumptions made.

The following paragraphs highlight the misleading nature of Canberra Airports 'Ultimate Practical Capacity' ANEF:

## Aviation Growth

Canberra Airport's ANEF is based on optimistic and untested assumptions about aviation growth that misrepresent the airport's true capacity for expansion. Predicted aircraft movements are grossly overstated for a regional airport that will ultimately be supported by a population of no more than 500,000 people. Lack of demand has already been demonstrated by the failure of every attempt to schedule overseas flights from Canberra Airport. Over estimation of aircraft movements has been a feature of all previous Canberra Airport Master Plans, particularly highlighted in 2005/06 when actual aircraft movements were barely one half of projections. The current Canberra Airport ANEF surpasses all previous versions in its massive over projection of aircraft movements.

Facilitating an aircraft arrival, turnaround and departure every two minutes, 24 hours a day, every day of the year, as projected by Canberra Airport, requires an airport with runways, tarmac area and supporting infrastructure that is significantly larger and more advanced than Sydney's Kingsford-Smith Airport. For example, where will they park, refuel, service, load and unload up to 100 large jet aircraft at one time? Canberra airport has limited land and infrastructure with no real prospect of acquiring the enormous land assets needed to operate as claimed.

On 17 December 2009, the Federal Government categorically ruled out Canberra Airport as a future second airport for Sydney (Transport Minister Anthony Albanese, Canberra Times, 17 December 2009, page 4). This must further call in to question the credibility of the airport's projections.

## 'Phantom' Flight Paths

The inclusion of a 15 degree offset approach to runway 35 in Canberra Airport's ANEF is incorrect and misleading. The effect is to artificially distort noise contours to the south of the airport, as well as encroach on Canberra's existing Noise Abatement Areas. A 15 degree offset approach path does not exist, nor does it ever need to. Current Required Navigation Performance (RNP) 'curved' approach procedures meet, in a better way, all noise respite requirements for existing and future residents. The existing 'curved' approach path to runway 35 is superior to the proposed 15 degree offset path in that it keeps arriving aircraft further away from Canberra's southern suburbs and still achieves the same offset tracking/noise respite at the Jerrabomberra end of the approach. Notwithstanding, RNP technology allows virtually unlimited tracking flexibility. Should a new offset approach path be needed in the future, it does not have to be locked in to 15 degrees, it can be 'as required'.

A 15 degree offset approach is not necessarily the best option for Canberra Airport and no such procedure has been authorised by Airservices Australia, yet the authority has endorsed the airport's ANEF incorporating the 'phantom' approach. The inclusion of inferior, unapproved and unnecessary flight paths in ANEF calculations is wrong.

## Operational Procedures

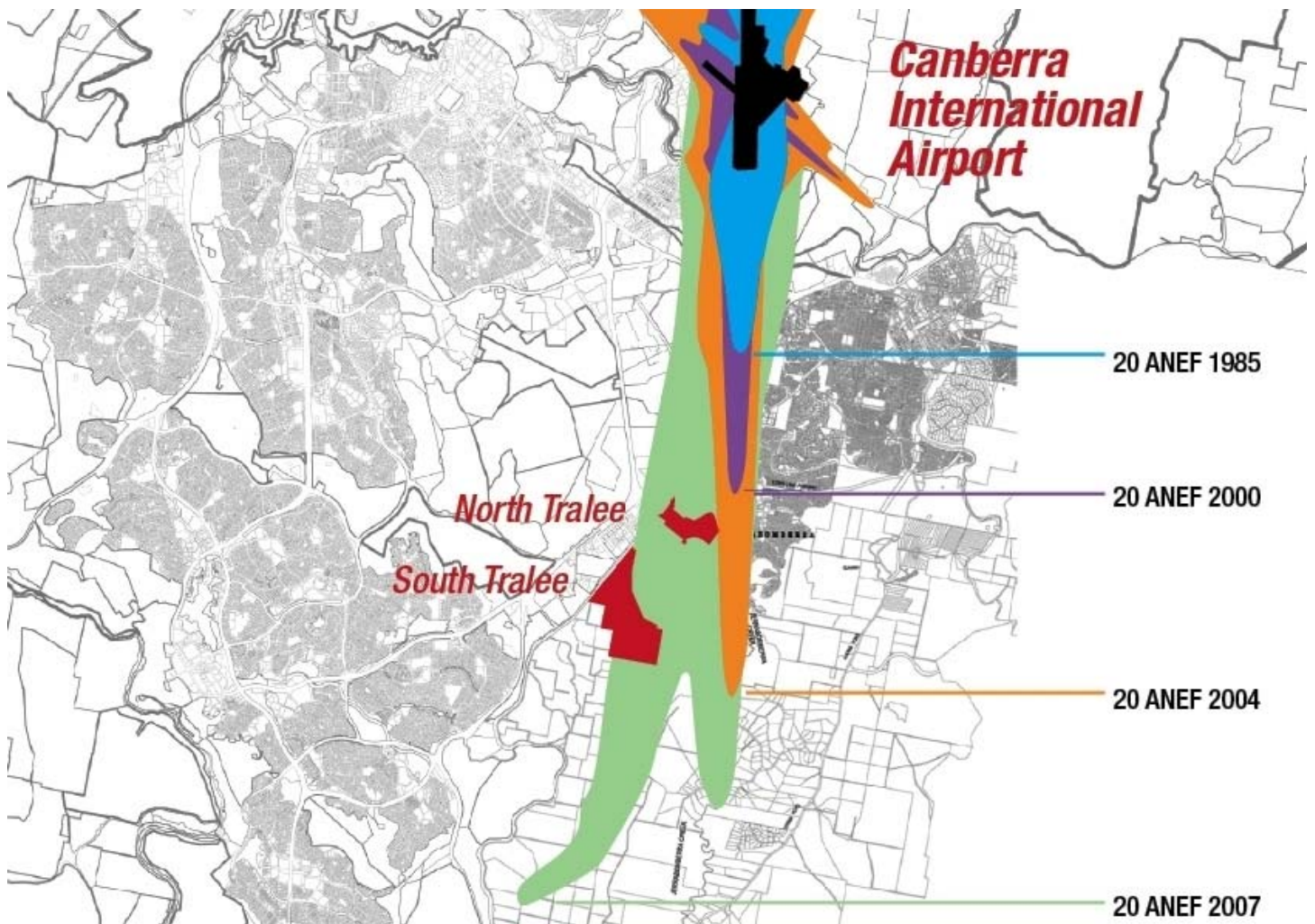
Assumptions made by Canberra Airport about downwind take-offs and landings and operations in low visibility conditions need further analysis. Some of these procedures are technically impossible and/or unsafe. This is due to prevailing winds, fog and obstacle clearance requirements around the airport. For example, low visibility operations at Canberra Airport are severely restricted by the surrounding high terrain. 'Engine out' missed approach requirements alone would prohibit Category II/III operations to most if not all runways. Regardless of improvements in navigation technology, aircraft climb performance limitations dictate that instrument approach minima/decision heights will remain around current values. In other words, true low visibility operations will not be an option at Canberra Airport.

### Other ANEFs

A comparison with any other regional or capital city airport will show how exaggerated Canberra Airport's ANEF really is. Airports with three times the infrastructure, more aircraft movements and ten times the supporting population have ANEF contours significantly smaller than those contrived by Canberra Airport. Sydney's Kingsford-Smith, Australia's largest and busiest airport, is a case in point.

Similarly, a comparison with Canberra Airport's previous (and slightly more realistic) ANEFs begs the question 'What has changed at Canberra Airport to suddenly cause aircraft noise footprints to be slewed to the south, four times bigger than they used to be?' The answer has nothing to do with aviation growth, it's simply Canberra Airport management's attempt to 'reverse engineer' aircraft noise contours into areas they wish to quarantine from legitimate development.

The following diagram illustrates the rapid and incredible expansion of Canberra Airport's ANEF:



### Minimising Aircraft Noise

Canberra Airport claims to be pro-active in delivering noise respite measures to communities living in the vicinity of the airport, yet Noise Abatement Departure Procedures (NADP) have not been introduced. NADP climb profiles offer immediate reduction in aircraft noise, and will impose no cost or operational penalty on the airlines. Most capital city airports around the world use NADP climbs as standard operating procedure – this includes Sydney's Kingsford-Smith.

NADP climbs ensure that departing aircraft are significantly higher on their departure tracks near the airport, thus reducing noise on the ground, and shrinking ANEF contours accordingly. (If required, I can provide 'real time' Canberra based flight data to substantiate the benefits of NADP).

### Endorsement of ANEFs

For the ANEF system to be an effective planning tool for stakeholders both on and off the airport, aircraft noise contours must be based on realistic assumptions and sound operational procedures. 'Ultimate Practical Capacity' ANEFs like Canberra Airport's, based on theoretical, unsubstantiated and untested claims and assumptions, are a dishonest manipulation of Australian Standards. They do not reflect an airport's true capacity for growth. Yet, because the approving authority is not required to check the veracity of assumptions made, incorrect and misleading ANEFs can be endorsed by Airservices Australia.

Given that ANEFs are peak documents incorporated in Federally approved Airport Master Plans and used nationwide to guide land development around airports, mere 'rubber stamping' for 'technical accuracy' by Airservices Australia is not acceptable. Where users of ANEFs have reason to suspect manipulation, claims and assumptions should be checked by an independent and impartial authority.

## PRO-AIRPORT CULTURE WITHIN THE AVIATION AUTHORITIES

A culture of collaboration with airports, rather than regulation and oversight, is evident within the Department of Infrastructure, Transport, Regional Development and Local Government (DITR) and Airservices Australia.

The treatment of a proposed residential development at Tralee, to the south of Canberra Airport, serves to illustrate the bias within the aviation bureaucracy. Along with the owners of Canberra Airport, DITR and Airservices Australia have embarked on an aggressive and public campaign opposing the development on the grounds of excessive aircraft noise. This is despite the fact that Tralee, some 10 kilometres from the airport and not under any flight paths, fully complies with every Departmental and Airservices Australia land use rule and noise standard. This includes Canberra Airport's misleading ANEF and the recently released National Aviation Policy White Paper.

The following examples illustrate how Airservices Australia can be unduly influenced by an airport operator:

### Public Statements

In August 2002, Airservices Australia spokesman Mr Richard Dudley released a media statement specifically opposing residential development at Tralee. The thrust of the statement was that if Tralee went ahead noise sharing across suburban Canberra would be inevitable. Mr Dudley's statement was not based on any evidence, science or policy, he merely repeats the words used by Canberra Airport in its scare campaign against Tralee. The differing views held by other stakeholders and industry experts have been ignored. The unquestioned support given to Canberra Airport is surprising, given that Airservices Australia's own standards and policies deem Tralee to be suitable for residential development, and also ensure the Noise Abatement Areas that protect suburban Canberra remain sacrosanct.

Mr Dudley's anti-Tralee statements have now been incorporated in Canberra Airport's recently approved 2009 Master Plan. This, coupled with correspondence and internal working documents

obtained under FOI, shows that DITR is actively working for Canberra Airport, contrary to their own policies.

The question has to be asked, 'If Airservices Australia is so keen to protect the environment from the effects of aircraft operations, why have they not objected to other residential developments in areas of equal or higher aircraft noise?' There are plenty of examples of new developments in this category around airports in Sydney, Melbourne, Brisbane, Perth, Gold Coast, Coffs Harbour, Launceston, Camden and even in Tralee's neighbourhood at Jerrabomberra. Another nearby example is the recently opened ACT jail, under flight paths by Canberra Airport definition, yet approved and built by the ACT Government because the site met ANEF standards. Airservices Australia has not spoken out against these other developments, and seem to be singling out Tralee at the behest of the owners of Canberra Airport.

It would appear that airports are being favoured by the lack of consistency and balance in the public positions taken by Airservices Australia and DITR.

### Altering Flight Paths

A possible consequence of rearranging flight paths at airports is the quarantining of unnecessarily large tracts of land from legitimate development. Canberra Airport's proposed 15 degree offset approach is an example of how suitable land can be arbitrarily quarantined. This can impact badly on the plans and expectations of land owners, as well as local councils and State governments, who all carry out 'due diligence' before making decisions about land use in their communities. It should therefore be a requirement for Airservices Australia to consult with affected off-airport stakeholders when changes are being considered.

Canberra Airport's 2009 Master Plan makes it clear that the Airport and Airservices Australia worked closely to introduce the 'curved' RNP approach to Canberra's runway 35. It should be noted that there was no consultation, advice or forewarning of the new flight path for the affected off-airport stakeholders. Regardless of the noise respite benefits for the residents of Jerrabomberra, the 'curved' flight path encroaches on land marked for residential development in the 1998 ACT and Sub-Region Planning Strategy. Surely, other users of the land affected by altered flight paths are entitled to some input. It is important to note that Canberra Airport management specifically excluded Tralee and South Jerrabomberra land owners from the Canberra Airport Aircraft Noise Consultative Forum.

The legislation that allows Airservices Australia to divert flight paths over private property needs to be strengthened to ensure that proper consultation takes place with all affected off-airport stakeholders, especially where new or altered flight paths impact on already approved development strategies.

Yours sincerely

Kai Hansen