

Mr G.P. Willans

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**Senate Rural and Regional Affairs
And Transport References Committee
(Senator Nash Chair)**

**COMMENTS ON ISSUES RAISED AT THE CANBERRA HEARING OF THE
INQUIRY INTO THE EFFECTIVENESS OF AIRSERVICES AUSTRALIA'S
MANAGEMENT OF AIRCRAFT NOISE**

Thank you for allowing me to observe the Canberra hearing of the above inquiry. It was most beneficial from my viewpoint.

A number of contentious issues were touched on at the Canberra hearing on 10 June without perhaps hearing all of the aspects bearing on the matter. Living at the location arguably most exposed to jet noise to the north of Canberra Airport, I offer these comments to assist in informing the RRA&T committee on relevant matters relating to AsA's management of aircraft noise.

70 dBA as the Threshold for Aircraft Noise Disturbance

The Airservices Australia (AsA) CEO stated that 70 dBA was the accepted threshold for aircraft noise disturbance. **Does this mean that residents across Australia can be subjected to unlimited, repetitive aircraft noise events day and night at 70 dBA without any recourse to aviation authorities?** I suggest that the community envisages more finite limits than that.

In Sydney, considerable effort is made to disperse aircraft departures (noise sharing) to alleviate noise concerns. Residents living close to Sydney Airport are subjected to noise in excess of 70 dBA but, because of their proximity to the runways, receive little relief from dispersal of departures, their limited relief comes from changing the duty runway. The main beneficiaries of departure dispersal are the residents more distant from the Airport whose noise exposure might be around 70 dBA or under. Additionally, Sydney residents have a curfew gained in 1963 shortly after jet services were introduced to protect them from potential jet noise in the sleeping hours.

Noise Sharing at Canberra Airport. Here at Canberra, the alignment of the runway, relative location of high terrain and of suburbs, means that the jet flightpaths are largely optimised and there is no practical opportunity for departure dispersal or noise sharing. Current, noise-exposed residents could potentially bear jet noise 24 hours a day if Airport objectives were allowed.

Canberra is the quietest of the mainland capitals – something I and many others treasure – and even here, most residents will tolerate aircraft noise to 70 dBA during weekdays. However, in the evening and on weekends, residents' tolerance of 70 dBA of frequent or repetitive aircraft noise recedes. Canberra housing is also probably the most cold/windproof and therefore noiseproof; yet, external aircraft noise of 70 dBA will be sleep disturbing even in a Canberra home. For weather conditions promoting sleeping with the windows open, sleep disturbance would be exacerbated and occur at jet noise levels far below 70 dBA. The World Health Organisation has some useful guidelines on this specific aspect. Having lived at my current address since 1987 and having been a military aviator, I opine that B737s and B757s undertaking the initial freight movements between midnight and 2am will certainly be sleep disturbing for current Canberra and Queanbeyan residents. Later, I will address Senator O'Brien's question to Mr Brown of Curfew 4 Canberra about what flight activity might be acceptable in the sleeping hours.

The Lack of Curfew Guidelines. Although the first curfew in Australia was introduced at Sydney in 1963 and three others (Essendon, Adelaide and Coolangatta) have been introduced subsequently, there are no stipulated criteria or guidelines for the introduction of a curfew, or its continuation. It is entirely dependent on the whim of the Minister for Infrastructure.

The AsA CEO's remarks on 'acceptable' aircraft noise need to be clarified and an aircraft noise benchmark set in the simple terms of the maximum noise levels relating to time of day and a maximum number of noise events set for specific periods. Only then will residents have certainty and be able to make an informed decision on residences exposed to aircraft noise, and have a clearly defined benchmark against which to measure aircraft noise management. Criteria also need to be set for curfews.

Noise Complaints

The CEO of AsA appeared to downplay noise complaints by attributing a significant number to a few residents. In my observation, few residents have the time or know how to complain and when they do, find that the AsA response is frustratingly less than satisfactory.

I have likened the noise complaint system to a giant jelly, you prod it with a complaint and it quivers a bit, then resumes its original state.

I would suggest that the unexpectedly large number of submissions to the RRA&T committee is a better measure of community concerns about aircraft noise management.

Community Consultation

It is apparent from the discussion paper last year 'Safeguards for airports and the communities around them' and the resulting policy that DITRDLG and AsA think that consultation means an education program. The CEO AsA's remarks about improving community consultation are welcome if they are more than window-dressing, but as a first step, AsA will need to listen to the community, and that will require a quantum culture change. AsA representatives present as though they have had too much exposure to jet noise around airports and sustained hearing loss when asked to listen to the community.

Chairing Airport Noise Forums

Appointing local government to chair Airport noise forums would be a most welcome initiative. For too long, Airport noise forum chairing has resembled the fox in charge of the hen coop. For Canberra Airport, that will require the ACT Government and Queanbeyan City Council taking turns.

ANEFs

Vetting Projected Movements. Both the AsA CEO and the DITRDLG representatives appeared to confirm that no government agency vetted the projected number of aircraft movements and types of aircraft forming the basis of the ANEF. Apparently, there is a hole in the legislation which needs to be rectified. Vetting projected movements is not a role for the ANO because it compromises his/her independence; it appears to be a matter of government responsibility and accountability.

Weakness of the ANEF Methodology. The ANEF methodology is highly sensitive to peak aircraft noise levels but relatively insensitive to numbers of movements. As well, aircraft movements between 7pm and 7am are multiplied by four to compensate for night effects. For these reasons and with the objective of maximising the ANEF footprint, Canberra Airport needed to artificially load the aircraft movement table with the maximum feasible number of large, noisy jets weighted to the night hours. It did so for the currently-approved, bloated ANEF.

Practicality of the Technical Noise Assessment. The CEO of AsA stated that it was AsA's responsibility to technically verify the ANEF noise assessment undertaken by the Airport. In the case of Canberra Airport, I challenge whether they have even done this well. The Canberra Airport ANEF provides for a jet movement every two minutes of every night. The listed aircraft are noisier than Qantas B737-800s which subjected residents of Hackett to up to 69 dBA of jet departure noise day and night last year, measured at the Hackett noise monitor terminal. I suggest that jet noise of over 70 dBA every two minutes of the night, every night, would cause considerable concern to current residents and voters. I question the practicality of the AsA noise assessment of the Canberra Airport ANEF. It seems that all AsA

may have vetted is whether the projected aircraft movements were within the capacity of the runway and airspace, and even this was seriously contested by the representative of Village Building. The ANEF vetting must include a practicality assessment of whether the noise effects of the projected movements are tolerable to noise-affected residents, particularly during the sleeping hours.

Aircraft Noise Ombudsman (ANO)

I currently have an aircraft noise complaint against AsA running with the Commonwealth Ombudsman. It has become readily apparent that the Commonwealth Ombudsman lacks the expertise about aircraft noise to make judgements or test the AsA advice and I have requested the Investigating Officer to visit Canberra to gain first-hand experience to test my and AsA's comments and positions.

I researched the skill sets for the new ANO post and expertise in aircraft noise is not specifically required, so in making judgements on referred complaints, the ANO will be heavily dependent on AsA for advice on noise issues. The quality of AsA's advice is questionable. This will not reflect well on the ANO's transparency and independence.

In regard to the ANO being responsible to the AsA Board, I find that this exacerbates transparency and independence challenges and would be quite inappropriate on the basis of the handling of my complaint to the Commonwealth Ombudsman so far. I suggest it would be far better for the ANO to be responsible to Parliament.

Departure vs Arrival Noise

The Managing Director of Canberra Airport appeared to state regarding Jerrabomberra and Tralee that departure noise was louder than arrival noise. I challenge that. Aircraft noise certification for the B737-800, B747-400, B757-200 and B767-300 shows that the approach noise signature is louder than the take-off mode, sometimes quite significantly. Additionally, departing aircraft will be 2-3,000 feet higher than landing aircraft passing Jerrabomberra and Tralee, so approach noise is likely to be the noisier.

At the northern end, the opposite is true because landing aircraft are lower and are partially hill-shadowed behind the Majura-Ainslie ridgeline. This does not apply for most departing jets. At night when conditions are usually calm, runway 17 could be used for both landings and take-offs advantaging residents at both ends of the Airport. However, if this was done officially, the ANEF would shrink, weakening Airport and AsA opposition to Tralee.

What Flight Activity Might be Acceptable During the Sleeping Hours

Senator O'Brien appeared to ask Mr Brown how many movements during the sleeping hours would be acceptable to Curfew 4 Canberra. The acceptability of jet movements during the sleeping hours depends on:

- the loudness of the aircraft noise event relative to background noise and whether it exceeds the waking threshold in the bedroom;
- the number of aircraft noise events;
- the number of residents whose sleep could be disturbed by aircraft movements;
- the purpose of the aircraft movements; and
- whether the community is significantly dependent on the Airport for prosperity and would benefit significantly from such night operations.

Quite obviously, the aircraft noise event has to exceed the waking/disturbance threshold in the bedroom and be relatively noisier than background noise for residents to be wakened or disturbed by aircraft movements. Equally importantly, the more noise events, the greater the likelihood of being awakened/disturbed. Senator Back appeared to have some experience of these issues with early morning mining fly outs at his home in Perth.

Purpose of the Night Movement. There is no national interest in shipping Sydney airfreight through Canberra; indeed, there is national disadvantage. The reason for the prospective night movements is that past and current governments lack the political courage and will to solve the problems in constructing a very necessary, second Sydney Airport near Sydney. Past and current governments would prefer that a fast train link from Canberra to Sydney Airport be built, at substantially more cost than a new Sydney Airport, to facilitate and make convenient the use of Canberra Airport as a proxy for Sydney Airport, if it avoids having to make some discomforting decisions. Only the residents of the eastern fringe of Canberra and the western edge of Queanbeyan will be disadvantaged to save political discomfort around Sydney. When Canberra residents realise how they are being used, there is likely to be a political backlash locally.

Dependence on the Airport for Prosperity. Another key aspect is the community's dependence on its Airport for prosperity. Here at Canberra Airport – a domestic passenger airport - the owners are noted exponents of the old business adage 'privatise the profits, socialise the costs' and the freight hub and second Sydney Airport proxy proposal fits that adage well. There will be little community benefit from Canberra Airport becoming the freight hub or from 'cheap charlie' airlines servicing the Sydney market, using Canberra Airport when Sydney Airport is closed by curfew.

In the circumstances prevailing around the freight hub and noting that the nominated aircraft types will generate sufficient noise to disturb sleep or waken residents, the answer to Senator O'Brien's direct question is none. If there was significant community advantage or national interest, there might be some tolerance of a limited number of flights, noting that the number of noise-affected residents will be substantial.

Taking the Conservative Approach to Airport Protection and Nearby Land Utilisation

Senator O'Brien touched on the issue of taking a more conservative approach to land zoning near flight paths to protect airports from perceived urban encroachment, noting that it usually quarantines convenient, economic living space. However, the growth in aviation means that, in truth, airports are encroaching on residents through more noise events over an expanding period. Every capital city airport, even the new Brisbane Airport, is experiencing noise/curfew pressures, and the PM, when in opposition, championed a curfew for Brisbane Airport. This has occurred because the noise characteristics of jet engines have never been properly recognised in urban planning and residents who are exposed to aircraft noise become less tolerant as they are subjected to an increasing number of noise events over longer operating periods, particularly when it appears likely to worsen.

Here at Canberra Airport, the opportunity to hold the southern approach open for a 24-hour airport was lost when Jerrabomberra was begun in the 80s. At the northern end, the opportunity disappeared in the 60s when Hackett was built. Governments can find the political courage and will to impose night noise on residents generally if they choose; they just run the risk of being reduced to the Opposition.

If the current government can find the political courage to build a new Sydney Airport near Sydney, it will be in a position to ensure that it safeguards it adequately this time, taking up Senator O'Brien's point.

Protection of the Public Interest

The role of protector of the public interest has not been discussed; yet, it would seem to lie with DITRDLG and AsA. They have failed the Australian people abysmally in the discharge of this function. Their responsibilities and accountabilities in protecting the public interest need to be defined and posted prominently.

Closure

Speaking as a noise affected resident, the aircraft noise situation appears to be deteriorating at every major airport in Australia as movements increase over longer operating periods. Future Chapter 4 aircraft may be a little quieter than current jets, but their noise signature is not so quiet as to pass near residences unnoticed. AsA has done nothing effective to alleviate or manage the situation, nor will it, without significant pressure and direction from Government.

AsA needs to develop equivalent passion and culture towards the management of aircraft noise that it has for safety and supporting and nurturing the aviation industry.

Geoff Willans