

Mr G.P. Willans  
43 Mackenzie St  
HACKETT ACT 2602

Telephone: 02 6248 0024

28 July 2009

**The Prime Minister**

**The Minister for Infrastructure, Transport,  
Regional Development and Local Government**

**The Parliamentary Secretary for Defence Support**

For Information:

**Leader of the Greens**

**NATIONAL AVIATION POLICY – DISCUSSION PAPER ON  
'SAFEGUARDS FOR AIRPORTS AND THE COMMUNITIES AROUND THEM'**

The following comments are directed to the Department of Infrastructure national aviation policy discussion paper '*Safeguards for airports and the communities around them*', dated June 2009. I thank you for the opportunity to comment upon it.

I have invited the Prime Minister into this matter because of his past interest, whilst in opposition, in Brisbane Airport matters and support of a curfew there, as well as the likely, politically-sensitive effect of proposals advanced by the discussion paper. The Parliamentary Secretary for Defence Support is responsible for Defence airfields and my comments could also have implications for these airbases which sometimes support civil as well as military aviation activities, hence his involvement. **For Prime Minister Rudd – if your government's national aviation policy objective is to advantage the aviation industry at the cost of the community even more than the Howard government, you need read no further.**

I comment as an ex-military aviator who has flown jets and turbo-props from Canberra Airport, and as a neighbour of over 20 years of Canberra Airport flight paths, living 6.6 kilometres from the runway intersection to the NNW, 2.3 kilometres to the west of the runway 17/35 northern departure and arrival path, and within the Canberra Noise Abatement Area.

**Policy Context**

**Subsidy.** Since WWII, the Australian aviation industry has benefited extensively from Government support and subsidy. While support has reduced as Qantas and the major airports passed to private ownership, subsidy has still occurred. For example, eight years after Canberra Airport was sold, the Howard government subsidised more than half the cost of a main runway upgrade – this upgrade would never have occurred if it had been subject to normal commercial decision.

**Pollution/Polluter Pays.** The aviation industry is also a significant air and noise polluter, like the coal and power generation industries. The economic downturn and heavy, international airline losses will necessitate airline mergers to cut costs, and change services. At the same time, the passing of 'peak oil' and global warming/climate change will force changes to airline services; fewer services using larger, more fuel efficient aircraft will result. Moreover, no one living near a major airport wants more or longer aircraft noise pollution.

**Promote Required Long-Term Outcomes.** The formulation of a national aviation policy provides an opportunity to facilitate and advantage those long-term aviation changes that need to occur. More of the same old policy prescriptions will fail the Australian people as they have in the past. Additionally as a principle, the cost of pollution needs to be passed back to the polluter and not be carried by the taxpayer.

## **DISCUSSION PAPER** **'PLANNING FOR COMPATIBLE DEVELOPMENT' – page 6**

**Narrow, Unbalanced Position.** I am dismayed that such a narrow, unbalanced position could be put forward by the Department of Infrastructure as policy addressing '*compatible development*' for airports and the community. **The real thrust of the Department's position is 'enhancing the protection of airports from urban encroachment' and is much narrower than the title of the paper indicates. This is just another disguised subsidy where the Government proposes to legislate to protect airports from the normal commercial competition over utilisation of land, at the cost of the Australian taxpayer and noise-affected residents.**

From a community perspective however, the paper begins well. It notes:

*'According to the International Civil Aviation Organization (ICAO), aircraft noise is the most significant cause of adverse community reaction to the operation and expansion of airports.'*

*'The nature of aircraft noise patterns around airports and subsequent public expectations have changed in recent years with increased community pressure to impose operational constraints on airports or oppose airport growth. The issues of concern are the level of noise generated by individual aircraft, increasing numbers of flights and decreasing periods of respite as airports get busier. Particular concerns include increased movements during the sensitive night time period and reduced respite periods on weekends.'*

This is a sound, but limited summation of the issues.

**Identified Limitations of the ANEF System.** The discussion paper (page 7) then moves on to identify the following limitations of the ANEF system:

- *The system is a 'one size fits all' approach which does not take into account local circumstances - large airports are treated the same as small airports; greenfield airports are treated the same as built out airports;*

- *Experience has shown that ANEF contours do not provide a complete picture of the areas where residents are likely to have an adverse reaction to aircraft noise;*
- *The contours do not easily correlate to a publicly understandable 'decibel' noise level;*
- *ANEFs do not capture areas under very busy flight paths used by light aircraft, such as training circuits, which can be more annoying to some individuals than a small number of loud noise events; and*
- *Aircraft noise does not stop at a contour line on a map.*

Four of these points would be regarded as 'community' concerns, and subsequent discussion around the first point suggests that upgraded restrictions might be imposed on greenfields sites leading to a two-standard approach. This might not sit well with residents currently exposed to considerable aircraft noise who cannot see any relief from their plight. Moreover, there are additional, unidentified shortcomings of the ANEF system.

**Additional Shortcomings of the ANEF System That Were Overlooked in the Discussion Paper.** Other key shortcomings of the ANEF system that the discussion paper overlooks are:

- **Definition Acceptable to Residents of a Maximum Aircraft Noise Dose in Decibels.** Residents do not hear averaged, weighted ANEF levels; they hear raw aircraft noise events which degrade their residential amenity through the relative loudness and repetition, and disturb their sleep at night. Residents need to know the maximum noise levels in decibels (Lamax) to which they can be subjected, day and night. There is also a finite limit to residents' tolerance of aircraft noise which needs to be recognised. A defined maximum number of noise events, related to time/period of day and the availability of respite periods, needs to be determined. Noise events during the night and in the sleeping period are crucial elements affecting the community. The number of tolerated movements could be significantly lower than the runways and airspace will support. This is of particular significance where there is just one jet runway and the same residents are subjected to frequent, repetitive noise events without respite – e.g. Canberra Airport. If a maximum noise dose can be defined sufficiently well and with community support and acceptance, the ANEF system might be made redundant. More detailed comment on this topic is offered at annex A.
- **Accuracy of Noise Claims by Airports/Attendant Penalties.** The accuracy of aircraft noise claims made by airports in master plans need to be independently validated, with heavy penalties for understatement of the likely aircraft noise levels or number of noise events. To illustrate this point, the current Canberra Airport Preliminary Draft Master Plan states that no Canberra resident receives or will receive jet noise over 65 dBA (reset to 60 dBA for night in the Canberra Times of 20 July, page 4), to advance its quest to become the second Sydney Airport. However, higher jet noise readings to 70 dBA have occurred. Moreover, Jerrabomberra residents are routinely exposed to up to 82 dBA of jet noise from landing aircraft, but they are technically in NSW, not part of Canberra or the ACT (see annex B for aircraft noise readings). The Canberra Airport portrayal of the situation

is inaccurate and misleading, creating divisive tensions between the communities. Single event noise contour maps are used in the same plan, also significantly understating actual noise. Heavy penalties are required for providing misleading aircraft noise positions in airport planning documentation.

- **Bloated ANEFs/Inflated Aircraft Movement Projections.** The use of inflated aircraft movements in the ANEF to bloat the contours can deprive the community unnecessarily of needed, convenient, economic living space. Over the ten years of private ownership of Canberra Airport, the annual number of airline aircraft movements has only risen from 39,032 in 97/8 to 39,629 in 07/8. A concurrent 55.9% increase in passenger numbers has been met by aircraft of commensurate greater seating capacity. As further passenger demand eventuates, the airlines will simply replace the B737 mainstay with B787s/A350s of increased seating capacity over the B737 to meet demand. Yet, the approved ANEF (2050-60) is based substantially on a most unlikely 224,734 annual domestic airline movements – a movement every two minutes during the sleeping hours. The residents currently exposed to aircraft noise pollution would not tolerate repetitive noise events on this scale; airlines would also seek to reduce costs by using larger aircraft, rather than more aircraft. Moreover, the community is also deprived of economic, convenient living space by unnecessarily-bloated ANEFs. Aircraft numbers and aircraft types forming the basis of an airport ANEF should be subjected to full, proper and transparent public audit.
- **Aircraft Noise Monitoring and Complaint System.** In undertaking its role as protector of the public interest, an effective, easily-accessed, transparent noise complaint and monitoring system is needed. The noise complaint system needs to provide proper response to complainants as other government departments do, not just a fob-off acknowledgement of the complaint.
- **Development of Even-handed Aviation Policy/Transparency/Unbiased Application/Empowerment of Noise-affected Residents.** Noise-affected residents do not have confidence in the system because their issues are dismissed and they do not have the same access to government or influence over policy as the aviation industry interests. All discussion and decisions on aircraft noise issues need to be conducted transparently. Further illustration of the imbalance in access to government on such issues is offered in the attached e-mail to the Minister for Infrastructure of 13 July (enclosure 1).
- **Imbalance in Aircraft and Other Residential Noise Regulations.** The imbalance, particularly at nighttime, between permissive aircraft noise regulations and more protective regulations for residents from other sources of noise pollution. For example, Canberra Airport considers that subjecting Queanbeyan residents to up to 82 dBA of night jet noise is quite acceptable; yet residents can only subject neighbours to 35 dBA of recreational noise at night. The irony is that a noisy party might disturb other residents within say 50-100 metres, but jets can repetitively bathe residents of four suburbs simultaneously in loud, sleep-disturbing noise without any effective recourse.

**Recommendation.** These additional deficiencies need to be included in the identified shortcomings so that a true appreciation of the many failings of the ANEF/AS 2021 system is drawn.

**Limp Policy Response to Community Concerns.** The discussion paper then hints bureaucratically:

*'there is scope to act to minimise community exposure'* (page 7).

From this statement and the earlier identification of the limitations of the ANEF system, residents might reasonably expect effective, decisive address of the 'community' concerns, but all the discussion paper can limply offer as a policy response to residents is some sort of information program:

*'In response to community concerns, additional tools have been developed to assist individuals gain a clear understanding of aircraft noise exposure patterns - in particular the generation of information showing the location of flight paths and how often and at what times they are used. Noise information is provided in the form of descriptors based on single event contours (eg the N70 which shows how many noise events louder than 70dB(A) there are at a particular location).'*' (page 7)

This insults the community. **The community cries out for relief from aircraft noise; the Department of Infrastructure offers an information/education program.**

Residents, particularly those exposed repeatedly to aircraft noise, are already well-equipped to judge whether noise is loud and intrusive, whether frequent or repetitive aircraft noise events are tiring and irritating, and whether aircraft noise in the sleeping hours will disturb sleep leading to fatigue and possibly health problems. **It is the Department that needs an education program to understand the community perspective, balance policy objectively, and develop appropriate aircraft noise mitigation measures.**

#### **Discussion Paper – 'Options for Enhancement to the Current Arrangements' (page 7)**

The options proffered in the paper for enhancement of the current arrangements include:

- *Reviewing the ANEF system and clarifying whether it is solely a tool for land use planning or whether it has a role in describing noise exposure patterns around airports;*
- *A full review of AS2021 as a planning guide for state and local governments;*
- *In addition to the ANEF, provision of comprehensible noise information, such as flight path location and activity diagrams and N70s, enabling individuals to gain a clearer understanding of aircraft noise exposure patterns around airports which enables them, for example, to factor this information into decisions about house purchase;*
- *Ensuring that supporting the current and future operations of airports is one of the objectives of planning, and establishing arrangements for that objective to be balanced with others in planning and development decisions;*
- *Developing stronger arrangements for protection of corridors under flight paths, particularly avoiding residential and other noise-sensitive development in such corridors;*

- *Considering more conservative criteria for noise-sensitive developments under flight-paths, particularly in relation to development of greenfield sites or where other options are available; and*
- *Considering special arrangements for state and local government consultation with the Commonwealth government on proposed developments around federal airports so that the impacts on airport operations can be fully assessed and taken into consideration in decision-making.*

It is patently clear from these options that their objective is to further strengthen the protection of airports from urban encroachment, limiting the utilisation of land to community disadvantage while the aviation industry avoids having to pay for its noise pollution.

## **Conclusions**

It is obvious from the prior discussion that the ANEF/AS 2021 system neither delivers acceptable noise outcomes for residents, nor protects the airport from urban encroachment, although the discussion paper fails to say so.

**The proffered options for enhancement of the current arrangements will facilitate the politically-sensitive outcome of increasing protection of airports at taxpayer not airport cost, allowing more flights particularly at night and subjecting currently-exposed residents to even more aircraft noise, while reducing available living space to the detriment of the community. If the Rudd government, facing an election next year, cannot see the risks in these options, so be it; Green candidates around the major airports will prosper.**

**Increase in Tension.** Comment is offered in the discussion paper that

*‘some level of tension may be inevitable’ (p7).*

In view of the rank imbalance in policy being proposed, tension is certain when current residents realise that they are being used for airport advantage. No one who lives near a major airport is asking for more aircraft noise pollution.

**Failure of the Paper.** Reduced to the essence, the discussion paper falls far short of an objective, balanced assessment of the ANEF/AS 2021 system and the attendant aircraft noise issues. Simply tinkering on the edges and providing more protection for airports will not provide the long-term prescriptions so necessary for national aviation policy.

## **Recommendation**

To foster the required, long-term outcomes, the current discussion paper needs to be withdrawn and replaced by a far more inclusive and comprehensive version. Then, a full, thorough, transparent review of the ANEF/AS 2021 system and aircraft noise matters can be

undertaken in which all aspects and issues are subject to concurrent consideration to inform the national aviation policy.

I assume that, as for the national aviation policy, responses will be posted publicly on a Departmental website.

Yours sincerely

Geoff Willans

Annexes:

- A. Determination of an Acceptable Maximum Aircraft Noise Dose
- B. Occasional Noise Readings Canberra – 3 May to 22 July 2009

Enclosure:

- 1. Copy of an e-mail to Minister Albanese dated 13 July 2009

## **DETERMINATION OF AN ACCEPTABLE MAXIMUM AIRCRAFT NOISE DOSE**

I shall begin by breaking the day into three periods – day is defined as 7 am to 7 pm, evening/morning as 7 pm to 11 pm and 6 am to 7 am, and night as 11 pm to 6 am.

I also wish to note that the community's tolerance of aircraft noise relates to the community's dependence for prosperity upon the airport. Cairns' prosperity depends heavily on tourism, so residents might be more amenable to some aircraft noise during the night if it involves tourist flights. Here at Canberra, the airport is largely used for domestic travel, and residents do not appear well disposed to night flights disturbing sleep.

The situation for airports with a single main runway is more acute than for airports with multiple jet runways allowing some dispersion of departures to provide a degree of relief from noise. At Canberra Airport, the current jet departure and arrival paths are largely optimised. The alignment of the runway, relative location of suburbs and high terrain, limits options resulting in the same residents being potentially exposed to continuous noise. These issues also impinge on the maximum noise dose.

### **Day**

The bulk of flying activity is undertaken during this period. Background noise is higher, and noise-affected residents are generally more tolerant of intrusive aircraft noise. Residents might reasonably tolerate aircraft noise events to 70 dBA. However, residents' tolerance does not extend to continuous aircraft noise and a maximum number of noise events needs to be determined for this period, noting the need for respite periods.

### **Evening/Morning**

For these periods, background noise levels are generally lower than during daytime and residents are engaged in household activity. A reduction of 5 dBA in the allowable noise level seems appropriate. Additionally, the allowable frequency of noise events might be reduced.

### **Night**

Night is probably the most contentious period for aircraft noise matters. World Health Organization (WHO) research indicates that for sound sleep, the background sound level should not exceed 30 dBA and that awakening occurs around noise events of 40-45 dBA. The WHO recommends that individual noise events exceeding 45 dBA (Lamax) should be avoided. As well, WHO observes that the difference between the sound levels of a noise event and background sound levels, rather than absolute noise level, may determine awakening, and the probability of being awakened increases with the number of noise events per night.

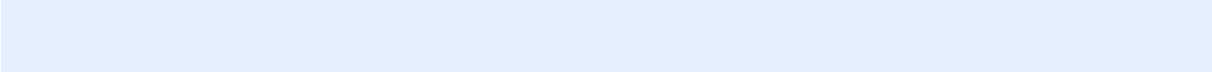
**Yardsticks.** Normal speech level is about 50 dBA. Here in Canberra and Queanbeyan, background noise during the sleeping hours is generally less than 30 dBA unless you live close to a major arterial road. In the Sydney suburb of Marrickville in the

Minister for Infrastructure's electorate, night background noise is at least 10 dBA higher. Airservices claims that houses (windows open) generally attenuate aircraft noise by 10 dBA but in trials undertaken by me, I only observed a 5 dBA drop. This suggests that the threshold for sleep awakening in Canberra would be about 40 dBA internal noise level reflecting the quiet background, equating to 45 dBA external noise level outside a bedroom window. This is higher than the allowable 35 dBA of noise for residences from other sources.

For Canberra Airport, I contend that no restriction would be placed on aircraft delivering less than 45 dBA maximum noise to affected residents. For aircraft subjecting residences to more than 45 dBA, I contend that the limit should be 50 dBA (awakening threshold), restricted to five movements or less per night. Breaches should be subject to heavy penalties paid by the Airport, unless the pilot has breached normal operating regulations. Other airports might vary their limits, depending on the noise situation for residents and the residents' acceptance of 'higher' aircraft noise events.

### **ANEF/AS 2021 Standard for Planning**

If each community's maximum noise dose can be determined by joint negotiation between residents and the aviation industry, then it can form the basis for land planning.



**OCCASIONAL AIRCRAFT NOISE READINGS**  
**43 Mackenzie St HACKETT/Hackett NMT/Jerrabomberra NMT**  
**3 MAY 09 to 22 JULY 09**

< 50 dBA (50 dBA - external noise level for sleep disturbance – 4 times background noise level (< 30 dBA) across most of Canberra in the sleeping hours)

50 - <64 dBA (50 dBA is normal conversation level)

65 - < 69 dBA (louder than normal conversation)

70 - < 74 dBA (loud conversation)

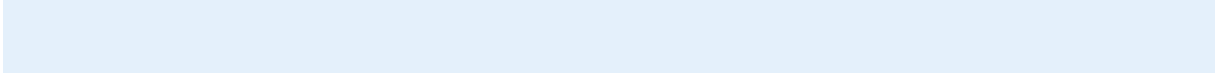
**75 and > dBA (what the hell was that!)**

3/5	1006	red helo tracking west	<b>72.9</b> dBA home	<b>75</b> dBA NMT
9/5	1443	prop driven trainer		<b>70</b> dBA NMT
	1701	Q737		<b>66</b> dBA NMT
10/5	0645	Q737		<b>63</b> dBA NMT
	1943	Q737		<b>67</b> dBA NMT
	2050	VB E190 landing 35	(Jerra)	<b>72</b> dBA NMT
	2055	Prop-driven aircraft		<b>65</b> dBA NMT
11/5	1234	Q737		<b>62</b> dBA NMT
	2000	Q737		<b>62</b> dBA NMT
12/5	0629	Q737		<b>64</b> dBA NMT
13/5	0917	Q767		<b>63</b> dBA NMT
	1117	Q737		<b>63</b> dBA NMT
	1948	Q737		<b>65</b> dBA NMT
	1953	Q737		<b>63</b> dBA NMT
14/5	0657	Q737		<b>66</b> dBA NMT
	2215	prop-driven at about 4500 ft		<b>67</b> dBA NMT
15/5	0646	prop-driven – 3kms NE at about 4500 ft		<b>63</b> dBA NMT
1/6	1626	light a/c		<b>74</b> dBA NMT
	1818	Q737		<b>62</b> dBA NMT
2/6	0652	Q737		<b>69</b> dBA NMT
	1018	Q737		<b>64</b> dBA NMT

3/6	0634	Q737		66 dBA NMT
	0656	Q737		63 dBA NMT
	1712	Q737		62 dBA NMT
	1745	Q737 landing runway 35 straight in	Jerra	75 dBA NMT
	1759	Q737		65 dBA NMT
	1820	Q737		67 dBA NMT
	1840	Q737 straight in landing 35	Jerra	72 dBA NMT
	1842	Q737 offset approach 35	Jerra	66 dBA NMT
	1909	Q737		62 dBA NMT
	1938	Q737		63 dBA NMT
	2058	Q737		62 dBA NMT
		Tiger A320 straight in approach 35	Jerra	70 dBA NMT
7/6	1935	Q737		64 dBA NMT
8/6	0639	VB E190		65 dBA NMT
	1946	VB E170 straight in approach 35	Jerra	71 dBA NMT
	1947	Q737		65 dBA NMT
9/6	1953	Q737		68 dBA NMT
10/6	0004	Tiger A320 appch 35	Jerra	72 dBA NMT
	0102	woken by Tiger A320 dep		56 dBA NMT
11/6	1816	Q737 straight in appch 35	Jerra	76 dBA NMT
	1817	Q737		65 dBA NMT
	1846	Q737		68 dBA NMT
	1937	Dash 8 straight in approach 35	Jerra	74 dBA NMT
	1937	Q737		68 dBA NMT
	1948	Q737		64 dBA NMT
12/6	1409	unknown a/c probably military		63 dBA NMT
	1843	Q737 straight in approach 35	Jerra	76 dBA NMT
13/6	1132	C182 @ about 4000 ft		71 dBA NMT
	1137	C150 @ about 3500 ft		69 dBA NMT
	1313	Be76 @ about 4000 ft		69 dBA NMT
	1329	Pa44 @ about 4500 ft		69 dBA NMT
	1703	Q737		64 dBA NMT
	1723	Q737		63 dBA NMT
14/6	1054	C206 at about 4000 ft 4 kms to the north		63 dBA NMT
	1209	P28R at about 3500 ft		71 dBA NMT
	1331	BE58 at about 4500 ft		75 dBA NMT

	1943	Q737		66 dBA NMT
16/6	1507	Helo inbound at about 3300 ft		66 dBA NMT
6/7	2208	Q737 straight-in approach 35	Jerra	76 dBA NMT
7/7	0647	Q737		67 dBA NMT
8/7	0614	Q737		65 dBA NMT
	0649	Q737		65 dBA NMT
10/7	1159	Light aircraft tracking Wly at about 4500 ft		67 dBA NMT
	1337	Dash 8 straight-in approach 35	Jerra	70 dBA NMT
		Q737 dep 35		64 dBA NMT
	1340	Light a/c tracking NWly at about 3500 ft		70 dBA NMT
11/7	1130	C182 at about 3500 ft		65 dBA NMT
13/7	0437	A helicopter flew NE to SW diagonally across the North Canberra suburbs at an estimated height of 5000 ft and a hand-measured noise of 72 dBA. If this helicopter was undertaking a medical transfer to Canberra Hospital, no other aircraft appeared to be near, so why did it transit across the North Canberra suburbs? With a westerly wind blowing, the aircraft could have approached the hospital from the Airport disturbing the sleep of far fewer residents. I ask for a detailed explanation of the flight path of this aircraft. This noise reading approximates what we can expect from the freight hub.		
	1950	Q737		65 dBA NMT
14/7	2018	Q737		64 dBA NMT
		Q737 straight in appch 35	Jerra	74 dBA NMT
	2133	Q737		64 dBA NMT
15/7	1710	Q737		67 dBA NMT
		Q737 straight in appch 35	Jerra	75 dBA NMT
	2356	jet departure 35 est noise 50-55 dBA		
20/7	0634	VB E190		62 dBA NMT
	1112	aircraft		75 dBA NMT
	1116	light a/c tr NWly at about 3500 ft		83 dBA NMT
	1943	Q737		64 dBA NMT
21/7	1946	Q737		64 dBA NMT
	2121	Tiger A320 straight-in appch 35	Jerra	73 dBA NMT

22/7	0634	VB E190		64 dBA NMT
	0649	Q737		66 dBA NMT
	0823	Q767 straight in approach	Jerra	82 dBA NMT
	0841	Q737 ditto	Jerra	77 dBA NMT
	1947	Q737		65 dBA NMT
	1954	Q737		65 dBA NMT



APPEARANCE OF BIAS BY THE AVIATION ELEMENT OF YOUR DEPARTMENT  
Geoffrey Willans <geoff.willans@yahoo.com.au>  
AddMonday, 13 July, 2009 3:09:14 PM  
To: Anthony Albanese <A.Albanese.MP@aph.gov.au>  
Cc: Antony Sachs <antony.sachs@infrastructure.gov.au>

Dear Minister,

A visiting British expert will be presenting on aircraft noise and climate change to selected invitees on 21 July under your Department's sponsorship. An objective of the presentation on noise is to 'lead into discussions about community engagement, environmental assessment etc'. Invitees include two representatives of Canberra Airport. I became aware of the presentation/discussion and informally sought an invitation as a knowledgeable, local community representative. This was refused.

At the same time, the Canberra Airport Preliminary Draft Master Plan is still to be decided and your Department has released on 24 June a policy discussion paper on 'Safeguards for airports and the communities around them' for public comment. The Departmental official with carriage of the policy discussion paper has quite properly been invited to the presentation. Any reasonable reading of the Canberra Airport Master Plan document would note that the subsequent Departmental paper appears to be promoting a Canberra Airport agenda - the similarities are significant.

In e-mails of 4 and 18 June, I outlined concerns over the Canberra Airport Preliminary Draft Master Plan and asked to meet with you. I was informed by a Departmental official on your behalf that 'It would not be appropriate for the Minister to meet with you regarding the matters you have raised or any specific comments to be made until the draft Master Plan has been assessed in accordance with the relevant provisions of the *Airports Act 1996*' (File Reference 04252-2009 dated 24 June 2009). Yet, it appears that Airport representatives can attend a presentation and discussion that could significantly influence the policy discussion paper which already promotes its position, but community representatives cannot.

The conclusion that I draw from the sequence and substance of documents and the 21 July meeting arrangements is that the Canberra Airport Preliminary Draft Master Plan has been defacto accepted because the policy paper position is designed to facilitate night movements at Canberra Airport and mute criticism, and that subsequent policy on aircraft noise and planning issues will reflect the Canberra Airport position. Your Aviation element appears to be in thrall to Canberra Airport.

During the Howard government's stewardship of the country, Ministers Anderson and Vaile consistently took a one-eyed, pro-airport approach, simply ignoring community criticism, and heavily subsidising the unnecessary, Canberra Airport runway upgrade. No one who lives near an airport thinks that the present aircraft noise situation is reasonable. When you announced a major review of national aviation policy, I thought that at last there would be some enlightenment, past policy bias might be redressed, and something like an even-handed approach develop.

I ask as a voter whether your stewardship will be any different and should I bother to comment on the policy discussion paper as it seems pre-ordained? Will your Department's responsibility to protect the public interest continue to be dismissed?

Yours sincerely, Geoff Willans

Mr G.P. Willans  
43 Mackenzie St  
HACKETT ACT 2602

5 August 2009

**The Minister for Infrastructure, Transport,  
Regional Development and Local Government**

For Information:

**The Parliamentary Secretary for Defence Support  
Leader of the Greens  
ACT Chief Minister  
The Queanbeyan Mayor**

**CONSIDERATION OF THE CANBERRA AIRPORT DRAFT MASTER PLAN –  
MISLEADING AIRSERVICES FINDINGS AND LACK OF IMPARTIALITY &  
OBJECTIVITY**

Dear Minister,

I refer to the Canberra Quarterly Report on the Airservices Noise and Flight Path Monitoring System for January-March 2009 and challenge one of its key findings relating to the Hackett Noise Monitor Terminal.

The following statement is made at page 12 of reference D in regard to the Hackett Noise Monitor Terminal (NMT):

*'Given a greater likelihood of community noise being inadvertently correlated to aircraft at the Hackett site, the 140 CNE which equalled or exceeded 70dB(A) at this NMT (see Table 1) were scrutinized. Of the 140 CNE, 72% of these were events with multiple peaks in the noise recording which are typical of community noise events. Note an aircraft noise event will have a single peak. Given this, the N70 value for the Hackett monitor presented in Table 1 should be considered an over-estimate and a more realistic statement of the N70 value is at least 0.44 per day.'*

This was used by Mr Byron, Managing Director of Canberra Airport, in a statement to the Canberra Times of 20 July (page 4) to endeavour to dismiss concerns over aircraft noise at Hackett. But, is the Airservices statement a fair, objective finding?

I have taken many noise readings with a sound level meter near the Hackett NMT at 105 Mackenzie Street (and elsewhere) and the community noise events (CNE) referred to in the Airservices statement are almost invariably passing vehicles. The duration of a vehicle noise event is far shorter than the passage of an aircraft either passing overhead or transiting obliquely at a distance. Moreover, vehicle noise levels are generally lower around 50-60 dBA although a motor bike or hotted-up car being revved hard may deliver much higher, albeit

briefly, noise readings. The situation is identical at Jerrabomberra where a road (Coral Drive) facilitating higher speed traffic than Mackenzie Street passes near the Jerrabomberra NMT. Yet, no similar statement was made in respect of the Jerrabomberra NMT where virtually every jet and Dash 8 straight-in approach delivers 70-80 dBA of aircraft noise pollution onto Jerrabomberra residents. Anyone standing beside the Jerrabomberra NMT as a jet passes overhead has no doubts about the source of the noise pollution.

Additionally, these CNEs are random; so, if they had corrupted noisy light aircraft readings around Hackett, they would have overwhelmed the B737 departure noise readings usually in the 60-69 dBA zone, raising them into the 70-80 band. Why has no such observation or finding been made in respect of the jet movements? Additionally, the coincidence of a noisy vehicle and aircraft passage has to coincide near perfectly to possibly deceive a skilled, experienced reader of the WebTrak system.

***‘Note an aircraft noise event will have a single peak’*** – Airservices statement. In listening to aircraft noise and taking many noise readings with a sound level meter as well as correlating them with WebTrak, it is my experience at Hackett that aircraft not directly overflying the observer as is the usual case here, generate rolling waves of noise, particularly the jets. This is readily validated aurally and with a sound level meter, just as it is observable on WebTrak. The Airservices statement is not sustained in my experience, and I also question its accuracy relating to Jerrabomberra.

I will now illustrate this contention with some typical examples from Sunday 2 August which you can validate on WebTrak:

- Qantas B737-800 at 1121-22 making a standard 35 departure (non-RNP). At its nearest point to the Hackett NMT, the aircraft is about 3-4 kms away and it takes the jet roar about 10 seconds to reach the NMT. You will note the overall duration of the noise event is about 30 seconds and three peaks – 62, a fall away then 65 rising to 68, another fall away rising to 60 dBA. There does not appear to be any vehicle corruption and I confirm the peak noise reading from my sound level meter. The Dash 8 trailing the B737 does not corrupt the reading either because it is quieter and hill-shadowed from the NMT by the intervening Majura-Ainslie Ridge.
- A propeller-driven Beech 35 departed Canberra Airport, tracking northwesterly along the NE Canberra Noise Abatement Area at about 1,000 feet above ground, passing the Hackett NMT about 1209. You will note several peaks rising to a maximum noise level of 72 dBA (I measured 74 dBA at home but I was closer to the aircraft) and a duration of about 40 seconds. Again, there is no appearance of vehicle corruption, but you will note the probable passage of a vehicle shortly after the BE35 noise reading trails off. The duration of the vehicle passage is about 10 seconds and the noise levels substantially lower. You only have to live here to know what the primary source of noise pollution is. Yes, there are a few hoons in the suburb but their vehicle noise signatures only occasionally dominate the aircraft noise profiles.
- An arriving Qantas B737 overflew the Jerrabomberra NMT at 2207 subjecting Jerrabomberra residents to an initial peak of 74 dBA, drop off, then second peak of 75 dBA. The initial jet noise from an approaching aircraft is the engine fan noise, followed by the airframe noise and after it passes, the tailpipe roar. Variations in approach noise

levels could occur from configuration or power changes near the NMT, providing more than one peak and challenging the Airservices' emphatic statement.

- At the same time of 2207, a Tiger Airways A320 departed to the north. I recorded 55 dBA with a sound level meter, but no recording was registered by the Hackett NMT, confirming its poor siting.
- This representation lacks a Dash 8, so I will use the Dash 8 currently overflying the suburb as I type as an example. The Dash 8 (4 August, 1138) tracks about 2 kms north of the Hackett NMT, tracking westerly. Multiple peaks (maximum 66 dBA) can be observed and again there appears to be no vehicle corruption of the aircraft noise signature. It should be noted that this noise event may be difficult to track because there is some malfunction of the WebTrak recording/playback system.

**I contend that the Airservices' finding is unsustainable and misleads the public.** If one of your ministerial office staff wishes to visit me at home, I will illustrate my findings to them. I also contend from having taken sound level readings on light aircraft overflying or passing near the suburb, that the WebTrak noise readings of light aircraft in the 70-80 dBA range are generally accurate.

Consequently, I recommend that:

- the Airservices statement and finding should be withdrawn while the true situation is ascertained,
- because of the publicity gained by Mr Byron, a public statement by the Head of the Aviation element acknowledging the error and retracting the report should be made, and
- a decision on the Canberra Airport Preliminary Draft Master Plan be held over until these concerns are resolved and a true appreciation of Hackett noise exposure is gained from a properly-sited NMT.

### **Lack of Objectivity/Impartiality**

I have already pointed out that the Jerrabomberra NMT which has been in place for some years is also subjected to CNEs. Airservices staff should have been aware of this and if CNEs were a concern, why was the Hackett NMT sited just before last Christmas near a suburban street and not in a more appropriate location? Moreover, the site at 105 Mackenzie Street is far from ideal; it is 500m further away from the northern jet departure path than my home, hence I can get higher noise readings on the jets, and on light aircraft tracking outbound along the north-eastern boundary of the Noise Abatement Area. The NMT is also sited lower and closer to the Majura-Ainslie Ridge and is thus more hill-shadowed than other residences in Hackett. Additionally, it does not have a window of 'hearing' against aircraft landing runway 17. Altogether, its siting makes it ineffective in gaining a true appreciation of the aircraft noise issues affecting Hackett and I wonder whether this is deliberate. The poor siting was pointed out to appropriate staff but they ignored the advice. Additionally, I have provided many noise readings to Departmental staff but their thoroughness in assessing the situation appears to have lacked objectivity.

Both Airservices and Canberra Airport have made much ado about Qantas B737-800s skirting round Jerrabomberra overflying Tralee, resulting in slightly less aircraft noise generally for Jerrabomberra residents. For runway 35 departures however, the RNP departure places the B737-800 some hundreds of metres closer to Hackett residents and in my opinion subjects residents to about 5 dBA more of jet noise over the standard departure. Has Airservices and the Airport said anything, or done anything about that, and how does it sit with the principle of minimising aircraft noise pollution?

Moreover, I notice that many B737-800s making a runway 35 approach opt for the straight-in overflying Jerrabomberra approach, rather than the offset, particularly at night. I understand that the freight aircraft will not be RNP fitted nor the crews appropriately trained, so this does not bode well for Jerrabomberra residents if the freight hub is to proceed. The night freight aircraft will presumably be operating uncontrolled outside Canberra Tower hours, and the captain can elect to land either runway 17 or 35. For an airport surrounded by high terrain, making a night approach using the runway 35 ILS seems a prudent safety decision.

Together, these issues and concerns suggest that the Department of Infrastructure and Airservices have not acted objectively and impartially in truly assessing the aircraft noise exposure of Hackett residents.

### **Aircraft Noise in the Sleeping Hours**

The resetting of the bar to '*no aircraft sound louder 60 dBA at night*' by Mr Byron from Canberra Airport (Canberra Times, 20 July, page 4) and the EIS for the new parallel runway at Brisbane Airport suggests that a spin is being developed that aircraft noise of 60 dBA or less will not disturb sleep or awaken aircraft noise affected residents. Consequently, no restriction should be placed on operations meeting these criteria, nor should they be limited.

Identical jets make the same noise at Canberra or Sydney; so, if they were operable from Canberra Airport in the sleeping hours, they would also be operable from Sydney where the background noise is at least 10 dBA higher and the risks of sleep disturbance from airfreight activities would be lower than say Canberra. This would also yield a far better climate change/greenhouse gas emissions outcome and could lead to at least the partial withdrawal of the Sydney curfew, and perhaps, the curfews at Adelaide, Coolangatta and Essendon airports.

In my experience of being regularly woken just after 6 am by the Qantas B737 to Adelaide, I would opine that a 60 dBA threshold will be far too high, at least at Canberra where background noise is less than 30 dBA. I also visit occasionally in the Brisbane suburb of Hamilton near Brisbane Airport where I am regularly woken by night take-offs on runway 02, quieter than jet noise at Hackett.

### **Closure**

Minister, I contend that:

- the Airservices' findings in respect of the Hackett NMT are unsustainable, mislead the public, and should be withdrawn until a true appreciation of the situation is made; and

- the Department and Airservices have not acted objectively and impartially in assessing aircraft noise at Hackett and that a decision on the Canberra Airport Draft Master Plan should be held over until the true noise exposure of Hackett residents is determined from an effectively-sited noise monitor not subject to vehicle noise.

I also recommend that aircraft noise affected residents need to be consulted extensively in setting an aircraft noise outcome permitting unrestricted night movements in the sleeping hours.

Yours sincerely

Geoff Willans

Mr G.P. Willans  
43 Mackenzie St  
HACKETT ACT 2602

11 August 2009

**The Minister for Infrastructure, Transport,  
Regional Development and Local Government**

For Information:

**The Parliamentary Secretary for Defence Support  
Leader of the Greens  
ACT Chief Minister  
The Queanbeyan Mayor**

**THE CANBERRA AIRPORT DRAFT MASTER PLAN & NATIONAL AVIATION  
POLICY 'SAFEGUARDS' DISCUSSION PAPER**

Dear Minister,

I refer to:

- A. Airservices NFPMS Quarterly Report for Canberra Airport January-March 2009.
- B. My letter of 5 August 2009 forwarded by e-mail of the same date.
- C. My letter of 28 July 2009 (not to all and forwarded by e-mail of 29 July).

With the benefit of a weekend to more closely analyse reference A, I would like to expand on my comments at both references B and C.

**The Incomplete Misleading Discredited Assessment of Hackett Aircraft Noise Exposure**

At page 12, the Airservices report (reference A) comments that the residents living on the eastern edge of the suburb of Hackett are the closest to the main northern jet flight path into and out of Canberra Airport and that the Hackett NMT was installed to correlate aircraft noise with jet arrivals and departures north of the airport.

**Context for the Installation of the Hackett NMT.** The Hackett NMT installation followed residents' challenges on aircraft noise issues that appeared to be understated in the first Canberra Airport Preliminary Draft Master Plan which you rejected in November 2008. Presumably, the Department of Infrastructure's objective for the NMT installation was to gain an appreciation of jet noise to the north of the Airport to inform decision-making on the expected second draft of the Master Plan, in line with the expressed purpose at reference A.

**Concerns with the Airservices Report.** My concerns with the NMT and Airservices Report are:

- **Siting of the NMT.** For the above purpose, why was the NMT sited at 105 Mackenzie Street Hackett where it could be subjected to community noise events? At this site, the NMT has no window of audibility on jets making a normal approach to runway 17, nor does it have for jets making a flatter than normal departure to the north because of the intervening Majura-Ainslie Ridge hill-shadowing the NMT, but not residents. Location of the NMT at this site might have been of benefit in assessing light aircraft transits of Hackett or VIP jet circuit training, but not the jet traffic departing/arriving to/from the north.
- **The Lack of Professionalism/Objectivity in the Airservices Findings.** Firstly, the findings do not appear to relate to the expressed objective of assessing jet noise exposure of Hackett residents. Next, no finding is made on the 39 of 140 N70 noise events that apparently did not have multiple peaks. Then, of the 101 of 140 noise events with multiple peaks, virtually all would have been light aircraft events and this did not appear to arouse any curiosity of the scrutineer/s to take a look at the jet noise profiles which would have also shown multiple noise peaks. The unintelligent resort to the apparent tenet '*an aircraft noise event will have a single peak*' without checking and genuine scrutiny betrays the real purpose of the assessment – to discredit any high noise readings so that Hackett noise complaints can be dismissed as irrelevant.
- **Conclusion.** In regard to the Airservices Report, I conclude that:
  - ◆ for the expressed purpose of assessing jet noise in Hackett to inform the draft Master Plan, the Airservices NFPMS Report (reference A) is incomplete, misleading, discredited and irrelevant; and recommend that:
    - ◆ the Hackett element of the Report should be withdrawn, with public announcement of its retraction;
    - ◆ the Hackett NMT needs to be resited to a more suitable location excluding community noise, if jet noise exposure is to be properly evaluated at Hackett; and
    - ◆ because of the lack of professionalism and objectivity exhibited by Airservices so far, future assessment of Hackett noise readings will need to be undertaken by an independent organisation.

### **Aircraft Noise Benchmarks Proclaimed by Canberra Airport**

**Canberra Noise Situation.** Two aircraft noise benchmarks have been offered by Canberra Airport. In the Draft Master Plan, the Airport claims to protect residents from more than 65 dBA of jet noise. This claim is rubbish – Jerrabomberra residents have been exposed to up to 82 dBA of window-rattling B767 noise (22 July, 0823) and Hackett residents to 69 dBA of B737 jet departure noise (29 July, 1946). Both the B767 and B737 are prospective night freight aircraft types. In The Canberra Times of 20 July, Mr Byron of Canberra Airport set a new, more restrictive, night benchmark of 60 dBA. It should be noted that the 60 dBA benchmark was not referred for public discussion in the Draft Master Plan, so no opportunity for public comment has been given.

**60 dBA Application for Sydney.** The 60 dBA benchmark is apparently being drawn from the EIS for the New Parallel Runway Plan for Brisbane Airport which contends that aircraft noise of 60 dBA or less will not disturb sleep or awaken nearby residents. If that is so, then it

also holds good for Sydney. Sydney Airport has an overwater approach/departure like Brisbane Airport and comparable background noise levels, perhaps even slightly higher, in the sleeping hours in nearby suburbs. So, if 60 dBA is acceptable in Brisbane for night movements, it also is acceptable for Sydney, negating the push to relocate the freight hub.

**WHO Guidelines.** The World Health Organization Guidelines for Community Noise state:

- individual noise events exceeding 45 dBA should be avoided for a good night's sleep;
- the difference between the sound levels of a noise event and background sound levels, rather than absolute noise level, may determine the reaction probability; and
- the probability of being awakened increases with the number of noise events per night.

**Required Night Noise Outcome for Canberra.** For Canberra and Queanbeyan, background noise in the sleeping hours is less than 30 dBA, more than 10 dBA less than suburbs near Sydney or Brisbane Airports. This suggests that for the same probability of awakening, Canberra residents should not be subjected to more than 50 dBA of aircraft noise in the sleeping hours, preserving the current night quiet treasured by residents. Normal conversation is in the 50-60 dBA range, so residents can easily appreciate whether the conduct of a normal conversation right outside their bedroom window would be sleep disturbing.

### **What Does This Mean for the Key Proposal in the Canberra Airport Draft Master Plan of Becoming the National Freight Hub and Second Sydney Airport?**

The lack of a satisfactory Airservices' jet noise assessment for Hackett is problematic; but, peak jet noise readings available on WebTrak for both Jerrabomberra and Hackett, despite their multiple peaks and the lack of Airservices' objectivity, are valid and many exceed the noise levels benchmarked by the Airport. Thus, significant numbers of residents are already subjected to aircraft noise in excess of the Airport's proposed benchmarks. Introduction of night freight aircraft will simply exacerbate the present situation and reduce the quiet period (11 pm to 6 am) when relief from the many noise events between 6 am and 11 pm is available. On these grounds, the Airport Draft Master Plan should be rejected.

However if the freight hub really needs to be moved from Sydney Airport, there is no reason why aircraft that can operate under an 'awakening' noise ceiling, agreed by aircraft noise-affected residents, should not be permitted to do so. The 60 dBA night noise benchmark, while possibly suitable for Brisbane and Sydney, has not been considered by the Canberra public, nor does it accord with WHO guidelines – a ceiling of 50 dBA might be more appropriate for Canberra and Queanbeyan circumstances. Whatever the benchmark, it will need to be agreed by the residents who will have to bear the noise pollution, and possibly being woken a number of times through the night. Disgruntled residents quickly become disaffected voters.

**Monitoring/Breach Penalties.** As aircraft noise already exceeds the Airport-proclaimed benchmarks, it would seem prudent to have both an effective monitoring system and heavy penalties for breaches, payable by Canberra Airport as the proponent of the scheme. The Hackett NMT, properly sited, would need to be permanently installed and additional NMTs might be required at Jerrabomberra/Tralea, West Queanbeyan, Narrabundah, Campbell and Gungahlin. The purpose of the proposal relates to Sydney air traffic, and Sydney-like penalties should apply. The Sydney penalty for breach of the curfew is up to \$500,000 per breach; for Canberra Airport, a fine of \$100,000-500,000 per breach, scaled to the degree that

the ceiling was breached, appears reasonable on the principle that noise polluters pay for their pollution.

### **National Aviation Policy – ‘Safeguards’ Discussion Paper**

**Transparency.** The *Airports Act* was drafted under the Keating government but enacted by the Howard government in 1996. Your Department has since used the airports as proxies behind which the Department hides. Could you and your Department please engage with the noise-affected residents, directly, openly and frankly, taking us into your confidence and putting all of the issues up on the table for public discussion. After all, we are also voters.

Minister, the comments I provided at reference B and these comments relate to and amplify the response I forwarded on the ‘Safeguards’ discussion paper. In the interests of transparency and good policy, I ask that they be appended to reference C for posting to the public website.

Could you please advise:

- why the Hackett NMT was sited at such an inappropriate location for its purpose?
- why the findings on the Hackett aspects in the Airservices NFPMS report do not address the expressed purpose of the installation of the Hackett NMT?
- Will the Hackett segment of the Airservices report be withdrawn?
- Will the Hackett NMT be relocated to a better site to monitor jet noise, where and when?
- Does the Australian government accept the WHO Guidelines for Community Noise and also accept that the relative loudness of noise events to background noise is a significant factor in sleeping residents being woken, particularly for Canberra and Queanbeyan?
- Will a 60 dBA ceiling for night movements be set for Sydney Airport as for Brisbane Airport and will that result in the freight hub being retained at Sydney Airport?
- How will jet noise issues related to Hackett and North Canberra be judged for the Canberra Airport Draft Master Plan in view of the discredited Airservices NFPMS report?
- What are the maximum aircraft noise levels that Hackett residents could be subjected to, related to time of day?
- Does your Department recognise that the introduction of RNP departures to the north penalises Hackett residents with louder aircraft noise events, contrary to the policy of minimising aircraft noise, and will the RNP departures be discontinued as alternative departures resulting in less noise are available?
- If noise benchmarks are introduced, will they be set after consultation with the public, will there be heavy penalties for breaches and an effective monitoring system to detect breaches, and will the ANEF need to be revalidated because of the significant affect the lower noise benchmarks would have on the ANEF calculations?
- For airports with a single jet runway, does your Department recognise the need for respite periods from continuing, intrusive jet noise and how long and when would those periods be?

Kind regards

Geoff Willans