



## *Jerrabomberra Residents Association Inc.*

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Department of Infrastructure, Transport, Regional Development and Local Government  
GPO Box 594  
CANBERRA ACT

Dear Sir

### **Submission on the Aviation Green Paper**

Thank you for the opportunity to provide a submission on the Aviation Green Paper.

Please find a submission from the Jerrabomberra Residents' Association (JRA) attached.

Yours faithfully

Margot Sachse  
JRA President  
21 February 2009

## Executive Summary

The JRA believes the Canberra Airport is a regional inner city airport servicing the local community, and as such, it must continue to operate within this framework. In summary:

- The JRA believes certainty about future aircraft noise can only be achieved through legislation of a 11pm-6am curfew for Canberra. We believe this is the only way to protect the interests of the Canberra-Queanbeyan community and ensure we will be able to sleep at night without the intrusion of aircraft noise.
- The airport should provide information to community on their website regarding actual aircraft noise exposure and the impact on specific areas surrounding the airport.
- The JRA supports the existing national ANEF standard to determine the suitability of land use adjacent to or near airports
- The JRA supports the recommendation in the Aviation Policy Green Paper of the establishment of Airport Planning Advisory Panels to assess the Airports master plans and Major Development Plans.
- The JRA believes all airports should have a mandatory Airport Consultative Forum that is truly representative of those communities affected by the airports. It should be chaired and convened by an independent person chosen by the Federal Minister for Infrastructure Transport, Regional Development and Local Government.
- The JRA believes that the current noise abatement areas must be legislated.
- That the southern RNP be the mandatory preferred route for all aircraft fitted with RNP technology.

## Introduction

### Who is the JRA?

The Jerrabomberra Residents Association (JRA) is one of the most active community organisations in the Queanbeyan City – Canberra region.

We were formed by volunteers from the newly-established Jerrabomberra community in the early 1990s, to help foster community spirit and develop caring relationships between local families. Over time, the JRA became increasingly involved with advocacy and lobbying for the particular needs of our community, at a Local, State and Federal level.

While we maintain our 'community' focus and desire to make Jerrabomberra a special place to live, we also draw on the collective experience, and skills of our JRA members to ensure infrastructure and resourcing concerns are addressed by all levels of governments

We currently have a position on the Canberra Airport Aircraft Noise Consultative Forum.

### Jerrabomberra

Jerrabomberra is one of the newest suburbs of Queanbeyan. Jerrabomberra was approved for development by the Queanbeyan City Council and the NSW Government in 1987 with the first houses being constructed in 1988. The suburb is now fully developed with over 3200 dwellings and a population of over 9,000.

Jerrabomberra residents are all too familiar with the impact aircraft noise has on their daily lives. This has become a major problem since December 1995 when, at the request of the ACT Government, the flight path was changed and all planes were funnelled down the western side of Jerrabomberra. The Instrument Landing System (ILS), or the flight path centre line, goes from Church Creek along the western parts of Jerrabomberra to the end of the runway. With 489 residences currently falling outside the current noise abatement zone, aircraft noise is a regular concern as Canberra Airport currently does not have a night time curfew.

When Jerrabomberra was approved for development in the late 1980's, the ANEF 20 was to the north of the suburb. In 1995 the flight paths were changed now with the majority of all flights now arriving over Jerrabomberra. Since that time most Jerrabomberra residents who have purchased their homes have considered the potential impact of the airport. The 1999 and 2005 airport master plans have indicated moderate growth in passenger traffic. However, the predicted growth in the number of flights has never met what was actually achieved by the order of about 30%. In the past the airport also provided information on their website regarding actual aircraft noise exposure and the impact on specific areas of our suburb. This was an easy and clear way to describe the ANEF system to the community. See attachment 1. It is the JRA's position that this information should again be provided by Canberra Airport.

The JRA supports development in the Jerrabomberra Valley that is compatible with surrounding development (not industrial). We see this as an opportunity for our community to get the community facilities it was initially promised, but never got. Facilities include an Anglican High School, Aquatic Centre and other sports facilities. The JRA has been working on this matter for many years, as development in the Jerrabomberra Valley has been continuously stalled as a result of the fierce opposition to the development by Canberra Airport and the seemingly endless litigation between the airport and the developer and government reviews. The Canberra Airport supports industrial development only in the Valley.

Throughout this process the Canberra Airport has attempted to attack the credibility of the Jerrabomberra Residents' Association and the Jerrabomberra community as a whole. This has been undertaken through numerous high profile media campaigns and letterbox drops - we even were sent earplugs by Canberra Airport at one stage! This approach by one of the largest and most profitable businesses in Canberra destabilises our relationship with the Canberra Airport and undermines trust with the community.

## **Master Plan Process**

In 2007, the airport released a document titled "Canberra International Airport Practical Ultimate Capacity ANEF". This document articulated Canberra airport's desire to significantly expand aircraft operations. The Airport proposed to increase annual movements from 80,788 in 2007 to a range of 136,209 to 180,551 in 2027/28, thence the ultimate capacity of 282,119. At ultimate capacity, over 120,000 movements (around 90,000 jet) will occur between 7 pm and 7 am. The R-AOS report at page 14 details 23,846 night freight flights – that's 65 flights per night, and 96,647 night-time passenger flights being 265 flights per night, every night. These flights would include long haul B747 freighters and large international passenger jets arriving and departing at the rate of one every two minutes. Currently we have four (4) freight flights (propeller aircraft, not jets) arriving and departing each night and no (0) passenger jets arriving or departing between 11 pm and 6 am. The data that underpins the Airport Practical Ultimate Capacity figures are weighted to the movement of the larger, noisier jets operating throughout the night. They are also planning to establish a regional, national and international 24 hour freight hub centre and a parallel third runway.

The number of aircraft movements contained in the ANEF is based on the theoretical capacity of the current Canberra airport runway system and has no correlation with the reality of actual aircraft movements and climatic conditions regularly impacting on the airport. While Air Services Australia has approved the ANEF for technical accuracy in June 2008, the JRA believes the Federal Government needs to require Air Services Australia to undertake an independent review of assumptions and data underpinning the new ANEF, to ensure it is a realistic forecast of actual movements and these forecasted figures need to be disclosed to the community on which it will impact. The Canberra Airport provided this data to Air Services Australia, but refuses to provide the data to Queanbeyan City Council or the NSW Government for independent validation. Failure to undertake this review has undermined the ANEF system which is used by various State and Local Government bodies as a key planning tool.

This failure to undertake a review of the current practical ultimate capacity (PUC) ANEF for Canberra Airport has allowed the airport owner to effectively sterilise land they do not own, simply by manipulating a future use forecast scenario and creating a bogus ANEF. As a result development in the Jerrabomberra Valley has been compromised. This bogus ANEF with a significant increase in aircraft activity means that the ANEF 20 contour is enlarged significantly and the high school we so desperately need cannot be built on the ideal site as it is now inside the exaggerated ANEF20 noise contour.

Typically airports provide 20-year forecasts in their master plans, not the maximum the airport could possibly handle, 24x7. This PUC ANEF is not used by any other airport in Australia. It is our view that any system must have checks and balances and not open to exploitation or manipulation by airport owners.

The JRA supports the existing national ANEF system as a standard to determine the suitability of land use adjacent to or near airports. As a residents association the JRA believes a national ANEF standard provides commercial confidence for businesses and a suitable comfort zone for residents. We also believe that all Australian airports should use the same ANEF system, not cherry pick make-believe concepts like the Canberra Airport using PUC to suit a particular agenda. The JRA believes that the data and assumptions that underpin any draft ANEF must be reviewed and validated independently.

The JRA supports the recommendation in the Aviation Policy Green paper of the establishment of Airport Planning Advisory Panels to assess the Airports master plans and Major Development Plans. We believe that it is crucial that these panels comprise a community representative with experience in airport noise impacts.

## **Community Consultation**

To meet its statutory obligation, Canberra Airport set up a body described as the Canberra Airport Aircraft Noise Consultative Committee (CAANCC). It included government agencies, the aircraft industry and representatives of community organisations. Its operating Terms of Reference were established after close consultation with the participating organisations.

Through its control of the agenda, the Airport managed to limit discussion to issues, which suited its operational and commercial development interests. However, when the CAANCC sought to consider matters not suiting the Airport (in particular the Queanbeyan City Council policy of a night-time curfew) the Airport unilaterally abolished the Committee and replaced it with a new body called the Canberra Airport Aircraft Noise Consultative Forum (CAANCF).

In this new body, the Airport increased the number of sympathetic representatives and excluded a number of community groups. Additionally, the Airport imposed additional restrictive Terms of Reference without consultation with the group.

In establishing the new body, the Airport sought to exclude the JRA, but after intervention by the then Federal Member for Eden-Monaro and the Australian Government Transport Minister, the Airport reluctantly conceded and included the JRA.

The JRA believes all airports should have a mandatory Airport Consultative Forum that is truly representative of those communities affected by the airport. It should be chaired and convened by an independent person chosen by the Federal Minister for Infrastructure Transport, Regional Development and Local Government.

## **Noise Abatement Zones**

The JRA supports the Governments intention to address noise impacts particularly at night. One of the main noise abatement procedures we have in Canberra are the noise abatement areas. The Canberra Airport continually claims that this provides protection to the majority of residents as jets don't fly over these areas. It is the JRA's position that these claims are false. Jets do fly over these

areas for various reasons, and more often than not, sequencing is causing incursions in the noise abatement areas, within the current airport capacity. The JRA believes that with the predicted increase in the number of flights, that sequencing issues will increase, and so will the incursions into the noise abatement areas.

The noise abatement areas for Canberra Airport are a voluntary measure and if the pilots chose not to abide by them, then there is no enforcement action taken against the airline or pilot by Air Services Australia for the breach. The current noise abatement zones offer no certainty to the community against noise relief as they are not legislated. Frequently, propeller aircraft cut the corners of the noise abatement areas and they do not apply to the VIP fleet that frequently breaches them when flying training circuits. In relation to the current noise abatement areas total noise protection to residents does not exist. The only way we can guarantee a good night sleep for all Canberra/Queanbeyan residents is to have a legislated 11pm-6am curfew at Canberra Airport.

The JRA believes certainty about noise abatement areas can only be done through legislation and a 11pm-6am legislated curfew for Canberra. We believe this is the only way to protect the interests of the Canberra-Queanbeyan community and ensure we will be able to sleep at night without the intrusion of aircraft noise.

## **Offset Approach**

Required Navigation Performance (RNP) is a curved offset approach to provide noise relief for Jerrabomberra residents. Unfortunately, this only applies to Qantas 737-800 aircraft that are just one to two flights a day, depending on weather and flight crew ability, so many flights continue to use the runway centreline. Planes cannot be retro-fitted with this technology and Virgin and the VIP fleet haven't applied to CASA to use this technology. The new Virgin Embraer fleet are not RNP capable. The JRA believes offset approach technology should be incorporated more quickly into all airline fleets and used as the primary landing route from the south for all aircraft currently equipped.

## **Complaints process**

The current web based centralised system for noise complaints is a vast improvement on the previous disjointed system. However, the system of noise complaints is fundamentally flawed as airports are not required to take any action on the complaints. More often than not, the data collected is actually used against the community by Canberra Airport. A recent example is the installation of a noise monitor at Hackett. After hundreds of complaints from local Hackett residents, it was representation to the ACT Government by local residents that brought about the installation of a noise monitor in their suburb to validate the impact of aircraft noise. Hackett is currently inside the noise abatement zone adjacent to the airport and not directly under a jet flight path. From JRA's perspective this is an example of Canberra Airport paying lip service to community concerns.