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5 November 2010

**Mr Mike Mrdak**  
**Secretary**  
**Department of Infrastructure, Transport,**  
**Regional Development and Local Government**  
**GPO Box 594**  
**CANBERRA CITY ACT 2601**

**Dear Mike**

**Canberra Airport submission**

**Please find attached our submission in response to the terms of reference for the Sydney Aviation Capacity Study.**

**Please do not hesitate to contact me if you have any queries, and in this regard we would welcome the opportunity to discuss this directly with the Committee if possible.**

**Yours sincerely**



**Stephen Byrnes**  
**Managing Director**



## **Introduction**

- 1. Canberra Airport believes that an aviation strategic plan for the Sydney region is an important stepping stone in developing an integrated approach to infrastructure development and planning for New South Wales. The finalisation of this plan is also critical to development and growth of the Australian economy.**
- 2. In this submission, Canberra Airport's focus is on its ability to assist in servicing the aviation needs of the Sydney region. In particular, Canberra Airport submits that the aviation capacity requirements for New South Wales can be met by the existing aviation infrastructure assets in New South Wales without the need for a Greenfields airport.**
- 3. In this regard, Canberra Airport believes that the existing main airports in New South Wales – Sydney Kingsford Smith, Williamstown Airport, Canberra Airport and if necessary, Richmond Airbase – can all, with relatively small infrastructure investment, cover the medium and potentially long term aviation needs for New South Wales.**
- 4. However, this solution will only be possible if appropriate land use planning around airports is adopted to ensure that these scarce economic assets are not further hindered by inappropriate development. This is a critical issue – if inappropriate development occurs around airports, not only will the airports be unable to service the aviation needs of the State, but it will also result in massive infrastructure spending elsewhere as the State and Commonwealth Governments are forced to remedy this situation with new infrastructure.**



### **Aeronautical Investment at Canberra Airport**

5. Over the 12 years since the purchase of the Airport we have spent hundreds of millions of dollars on Canberra Airport and in the process we have comprehensively rebuilt all of the aeronautical infrastructure at the Airport including:
- the main runway was upgraded to 747/A380 standard and was lengthened by more than 600 metres which enables these aircraft to fly to any destination in the world that is currently serviced out of Sydney Airport;
  - the old central terminal was entirely re-built into a multi user facility;
  - the taxiways and aprons were all upgraded – in particular, seven additional parking spaces for 737s were built (whilst sized for 737's they have been built to 747/A380 strength);
  - the terminal road systems were re-designed and re-built, as were all of the short and long stay carparks;
  - a brand new fuel farm was designed, developed, and commissioned;
  - an airline catering facility was developed and leased to an international operator;
  - a significant airfreight facility, hangar and distribution centre was designed and constructed for use by Australian Air Express – this continued the organic growth of the Canberra Airport freight hub;



- all of the rental car facilities were relocated and re-built;
- two major new maintenance hangars were built delivering new industry to the economy – a special purpose aircraft facility for the RAAF, and a Q400 maintenance hangar for Qantas;
- a 747 capable apron was built on the Fairbairn side of the Airport;
- the construction of the headquarters and operational base for the ACT Emergency Services Authority;
- MAGs were installed at Canberra Airport;
- Hangar 48 was developed for Emergency Services helicopters;
- Hangar 47 was developed for the AFP air wing and first response group;
- a blast fence was constructed at the end of the main runway to facilitate all runway take offs by heavy aircraft; and
- a new hangar, maintenance facility and office and administration centre was built for Brindabella Airlines.

**Other than the Qantas Terminal and the Control Tower every piece of aviation infrastructure has either been re-built or replaced in the first decade of ownership.** Furthermore though, in the next 12 months we will be undertaking further taxiway works to increase capacity as well as upgrading the Airport to the CAT II standard. However, by far our largest single investment in infrastructure is the development of the new Canberra Airport terminal.

6. The new Canberra Airport terminal is the culmination of 12 years of Airport ownership, and Stage 1 will be opening shortly. The new terminal will truly be



**a world class facility that will change the way that people look at Canberra Airport. It will:**

- **have 12 aerobridges and 44 check-in counters;**
- **cater for 6 million PAX with easy expansion up to 10 million PAX;**
- **have some of the largest airline clubs in the country;**
- **have a traffic and roads system that is designed for 10 million PAX with grade separated interchanges with the regional roads linking to the city; and**
- **have international capacity – a key requirement of the design brief.**

**Most importantly though, the new terminal has been designed with growth in mind. The terminal can easily be extended to allow for further growth of the aviation business.**

**7. As a result of undertaking this investment in the Airport, Canberra Airport has a number of key attributes that will allow it to play a role in the second Sydney Airport solution:**

- **There are no operational restrictions at Canberra Airport i.e there is no curfew. Canberra Airport can deal with international and domestic passenger and freight operations regardless of when they need to use the Airport.**
- **Canberra Airport is infrastructure ready – no additional capital works are required for Canberra Airport to play a role in the second Sydney Airport solution. Canberra Airport already has full international capability and infrastructure capable of handling all aircraft types and sizes.**



- **Canberra already has airlines flying to all of Australia's capital cities – a key factor in our ability to play a role in the Sydney Airport solution.**
- **We already have over 3 million PAX per annum and nearly 1,000 flights per week..**
- **Canberra Airport already serves a regional population of approx 500,000 and is a major economic driver for its region.**
- **Canberra Airport already services an existing population base that has associated infrastructure like hotels, and employable staff.**
- **Canberra Airport's flight paths are largely located over rural land, with minimal aircraft noise impact on the regional population compared with other major Airports.**
- **Canberra Airport is directly connected to the Federal/Hume Highways ensuring direct motorway access to Sydney Airport and the Sydney CBD (there are no traffic lights between Canberra Airport and Sydney Airport).**
- **Canberra Airport's role in developing itself as a freight and passenger alternative has already been approved by the Commonwealth in Canberra Airport's Master Plan.**
- **Qantas, Virgin Blue, Brindabella Airlines, and Tiger Airways all use Canberra Airport on a regular basis.**
- **Canberra Airport is already the alternate airport for a significant number of international carriers, with regular scheduled international flights commencing within 18 months.**



- Australian Air Express, Toll Holdings, Corporate Air already operate regular dedicated freight services.
- More than 10,000 people work on the Airport site.

8. This investment in infrastructure has, however, already changed the services and operations of Canberra Airport. As a direct result of the investment made in infrastructure, the aviation services provided at Canberra Airport have grown significantly and have already provided an alternative to those services provided at Sydney Airport.

**Point to Point Services – Reducing Sydney's Hubbing**

9. Fifteen years ago, the vast majority of domestic services to/from Canberra operated to Sydney and Melbourne. However, since the privatisation of Canberra Airport there has been a significant growth of point to point services - people flying to and from Canberra Airport no longer hub through Sydney freeing up slots at Sydney Airport.

10. In particular:

- a. frequency to Brisbane and Adelaide has increased substantially, such that most customers flying to these ports through Canberra Airport now take the direct services. The following table shows both the growth in these routes as a result of the direct services, as well as highlighting the flat growth in the Canberra-Sydney route as passengers no longer hub through Sydney Airport:

Canberra to:	1998/99	2007/08	Growth
Adelaide	93,155	206,529	121.7%
Brisbane	184,582	619,837	258.1 %
Melbourne	697,571	1,008,199	44.5 %
Sydney	836,122	887,447	6.1 %



- b. you can now fly direct to every State and Territory capital from Canberra Airport reducing dramatically the reliance of Canberra originating or terminating traffic hubbing through Sydney. These services include:**
- i. Gold Coast (previously Canberra-Sydney-Gold Coast)**
  - ii. Townsville (previously Canberra-Sydney/Brisbane-Townsville)**
  - iii. Hobart (previously Canberra-Sydney/Melbourne-Hobart)**
  - iv. Perth (previously Canberra-Sydney/Melbourne-Perth)**
  - v. Darwin (previously Canberra-Sydney-Darwin)**
  - vi. Albury (previously Canberra-Sydney/Melbourne-Albury)**
  - vii. Newcastle (previously Canberra-Sydney-Newcastle)**

**The table below summarises the growth in routes at Canberra Airport over the past number of years – importantly every route has increased in frequency except the Sydney-Canberra route – another indication that hubbing through Sydney is decreasing as more direct services to and from Canberra Airport are provided.**





Route	Flights per week August 2002	Flights per week October 2010	Increase %
Canberra-Brisbane	94	126	34.0 %
Canberra-Sydney	377	374	-0.8 %
Canberra-Melbourne	218	231	6.0 %
Canberra-Adelaide	22	43	95.5 %
Canberra-Perth	0	14	N/A
Canberra-Albury	0	20	N/A
Canberra-Newcastle	0	32	N/A
Canberra-Gold Coast	0	14	N/A
Canberra-Hobart	0	14	N/A
Canberra-Darwin *	0	6	N/A
Canberra-Townsville	0	14	N/A
<b>Total RPT flights</b>	<b>710</b>	<b>688</b>	<b>24.3% #</b>

11. As more flights bypass Sydney Airport over time, which we predict will happen with the opening of the new terminal, Canberra Airport will naturally assume a role in providing capacity solutions for the Sydney region. In essence the market, rather than any government intervention, will naturally start to use Canberra Airport as and when required – where Canberra Airport is an efficient and cost effective option.

**The Region Using Canberra Not Sydney - Our Reach is Growing**

12. Increased flights, new direct capital city destinations/city pairs, low cost airfares, and cheaper parking are and will continue to encourage greater use of Canberra Airport by residents across the region who may have otherwise travelled to Sydney Airport for their flight. This is especially relevant for residents located between Canberra and Sydney, such as residents of the Shoalhaven and the Southern Highlands. This reach will extend into South Western Sydney – especially for low cost carrier operations – just as



Newcastle Airport's reach does now. Indeed, even today we are finding that passengers living in Bowral, Mittagong, Goulbourn, Picton and others are already using Canberra Airport. Again, market forces are naturally increasing the role that Canberra Airport plays in the providing capacity to the NSW aviation market – the catchment area of Canberra Airport is increasing, not because of any particular regulatory change, but simply because in market terms Canberra Airport is an efficient option.

13. For the residents of this expanded catchment area, the following value proposition will make it very difficult for them not to use Canberra Airport as their main airport:

- Canberra Airport will have flights to every State and Territory capital – allowing both direct flights, and where needed hubbing options, for the passenger. There will also be direct international flights, as well some international flights that will hub through major Asian airports, being offered from Canberra Airport.
- The flights to and from Canberra Airport will not be subject to any curfew other operational restriction – giving greater certainty around travel and connection plans.
- The time to get to Canberra Airport will for many be less than the time it would take to get to Sydney Airport. Furthermore, the travel time will be more certain as there will be no traffic delays – an important factor when trying to catch a flight.
- The parking at Canberra Airport is significantly cheaper.
- When the new terminal at Canberra Airport is completed Canberra Airport will be easier to get to, easier to use and have more passenger facilities than



other airports.

- **Canberra Airport's new terminal will include a major regional ground transport hub which will significantly grow regional bus connections to the airport and continue extending the reach of the airport into the region.**

**The use of Canberra Airport by the residents of this region which will stretch all the way to outer Sydney over the next 15-20 years, will further reduce demand on the services offered by Sydney Airport, further freeing up capacity at Sydney Airport.**

#### **Development of Canberra Airport as a Domestic Hub**

**14. With an increasing range of destinations served non-stop from Canberra Airport, there is an increasing range of transit opportunities available for customers travelling between destinations with no (or few) direct flight opportunities. The important point about this is that passengers can bypass Sydney Airport and hub through Canberra Airport instead – further freeing up capacity at Sydney Airport. For example, current transit opportunities exist for the following routes (amongst others) utilising a single airline:**

- **Adelaide-(Canberra)-Gold Coast and return – Virgin Blue**
- **Albury-(Canberra)-Newcastle and return – Brindabella Airlines**
- **Brisbane-(Canberra)-Hobart and return – Virgin Blue**
- **Darwin-(Canberra)-Melbourne and return – Qantas**
- **Melbourne-(Canberra)-Townsville and return – Virgin Blue**

**15. Many of these hubbing options through Canberra are now quicker than hubbing through Melbourne or Sydney (as applicable). Furthermore, the relevant passengers would be hubbing through a smaller, newer, easier to use Airport that is not subject to any operating restrictions – allowing certainty**



that even if a plane is delayed at one port it would not be turned around at Canberra Airport.

**16. However, where multiple airlines are used (and with the internet this is now common), a wide range of hubbing possibilities arise including the following:**

- **Adelaide-(Canberra)-Newcastle and return**
- **Adelaide-(Canberra)-Townsville and return**
- **Albury-(Canberra)-Brisbane and return**
- **Albury-(Canberra)-Darwin**
- **Albury-(Canberra)-Gold Coast and return**
- **Albury-(Canberra)-Hobart and return**
- **Albury-(Canberra)-Perth**
- **Hobart-(Canberra)-Newcastle and return**
- **Hobart-(Canberra)-Perth**
- **Melbourne-(Canberra)-Newcastle and return**
- **Newcastle-(Canberra)-Darwin**
- **Newcastle-(Canberra)-Perth**

**17. All of the above hubbing options have the potential to offer both time, convenience and cost savings to customers. The point is this:**

- **as more passengers transit through Canberra Airport instead of Sydney Airport (especially NSW regional services) significant additional capacity will be made available for Sydney origin/destination passengers; and**
- **increasing numbers of passengers transiting Canberra Airport will increase the demand for flights in/out of Canberra Airport, allowing for additional frequencies being offered and further improvements to connection and hubbing opportunities - a virtuous cycle; and**



- the development of this hubbing option has occurred organically – airlines chose to hub through Canberra Airport because we were the best option from a competitive market position. Hubbing through Canberra will continue to increase organically provided the market continues to view us as an efficient, cost effective option – something we of course we wish to remain.

#### **Development of Canberra Airport International Market - Initial**

18. As described in our Master Plan, by 2011/2012 our expectation is that we will be offering the following international services:

- 4-5 times a week service to Auckland and Wellington; and
- 3-5 times a week service to Singapore or Hong Kong.

19. Passenger demand for these services will be a mix of business and government travel associated with Canberra's functions as the national capital, tourism traffic and people visiting friends and relatives. The business/government component of the market is high yield traffic, increasing the viability of the services for the airlines.

20. As a result of the provision of these international services:

- Canberra travellers who currently hub through Sydney for international services will fly directly out of Canberra. For instance, a Canberra traveller could fly direct to Singapore and connect with flights going to Europe. Or a Canberra Traveller could fly to Auckland and connect with flights going to the United States.
- Regional Travellers may well choose to fly internationally out of Canberra rather than Sydney Airport for many of the reasons already stated. Effectively the entire region around Canberra would be able to fly to



**Europe, America or Asia without needing to go through Sydney.**

- 21. In any event, the effect of all of the above is that further capacity at Sydney Airport would be freed up as more passengers used Canberra Airport as their departure and arrival point for international flights. Importantly, Canberra Airport's curfew free status will allow Airlines to use aircraft at off peak times to develop point to point international services to and from Canberra Airport – and there will no risk of suffering major operational disruption due to a service missing the curfew.**
- 22. The point is that with the amount of domestic hubbing that we have, and with the addition of international flights, the entire region around Canberra and Queanbeyan – from as far north as Wollongong to as far south as Albury - will be able to fly to anywhere in the world without needing to hub through Sydney.**

#### **Canberra Airport as a Domestic and International Freight Hub**

- 23. We have on a number of occasions set out in detail our expectations for the development of a domestic and international freight hub at Canberra Airport as an additional facility to that being offered at Sydney Airport.**
- 24. In this regard, in simple terms, the current issues with dedicated freight flights going through Sydney are as follows:**
- The Sydney Airport curfew limits the number and type of aircraft that can actually undertake dedicated freight flights.**
  - The Sydney Airport curfew only provides exemptions for certain aircraft – particularly the BAE 146. So at present most dedicated overnight freight flights through Sydney within curfew hours are undertaken by the BAE 146s. However, these aircraft are reaching the end of their lifespan and are**



too small for the job at any rate – inherently limiting the operational efficiency of freight at Sydney Airport.

- There is limited airport parking space and facilities for dedicated freight aircraft – this is a key factor.

**25. In market terms, the further development of Canberra Airport as a freight hub is the most efficient, simplest and most likely option given that Canberra Airport already has the facilities to deal with freight and is not subject to any operational restrictions.** Freight would be flown from around the country to Canberra Airport and exchanged to other aircraft for onward flight to its destination. This is a far more efficient system than the current freight system designed to work around the Sydney Airport curfew and it replicates the model used in the USA and Europe.

**26. What's more, the development of a freight hub at Canberra Airport:**

- will further free up capacity at Sydney Airport;
- is consistent with Commonwealth Policy to maintain and develop an north-south and east-west network of curfew free freight airports;
- will create jobs in the local region – both the ACT and NSW;
- will reduce aircraft noise in the Sydney region;
- will free up slots and parking at Sydney Airport for RPT use; and
- will facilitate a more efficient freight network.



## **Development of Canberra Airport market – the Future**

**27. In the long term, we expect to develop the following further market segments:**

- **The low cost international carrier market - As Sydney Airport grows it will have pressure on its eighty movements per hour cap and will need to introduce efficient pricing signals at peak times and more generally. Sydney Airport may also seek to avoid low cost carriers, smaller aircraft and freight aircraft. These low cost carriers will want to use cheaper, less constrained secondary airports - such as Canberra Airport – using the same model that used by other low cost carriers in Europe which utilise airports such as Luton, Manchester, Newcastle and Liverpool.**

**Again, with the hubbing out of Canberra to every other state and territory capital city, a whole family could drive from regional NSW to Canberra, park at cheap rates, use a brand new terminal and then hop on their low cost carrier to their holiday in Thailand or Bali. Furthermore, you might even find that people from Sydney, who are looking for holidays on a budget, will have little trouble in driving the 3 hour stretch from Sydney to Canberra, parking the car at cheap rates for an extended period, and getting a low cost carrier for their family holiday.**

- **Similarly, over time we expect that domestic low cost carriers, in conjunction with the regional bus hub being established at Canberra Airport, will also use Canberra Airport in preference to Sydney Airport.**

**28. With the new terminal, the aviation investment, the freight hub, the impressive growth rates, the hubbing and point to point services, plus the arrival of international and low cost carrier services – Canberra Airport believes that the market (rather than a regulator) will make a decision to use Canberra Airport**





as part of the infrastructure required to play a role in the Sydney Airport capacity needs/requirements. Key to this is that we have no operational restrictions – we can have 24hr freight, we can have back of clock route development by the airlines, we can welcome international flights at the hours that suit them, we can play a role in the freight network and we have the room and the capacity to further grow.

#### **Development of a Corridor**

29. However, ultimately the development of Canberra Airport gives rise to a much bigger issue – the airport development can be the catalyst for the establishment of an economic and transport corridor from Sydney to Canberra and on to Melbourne. The corridor from Sydney to Melbourne is the third busiest aviation corridor in the world and it seems only logical that we take advantage of it.
30. If a new second Sydney airport was ever proposed to be built in NSW it will be distant from Sydney and it will need a high speed rail link to the Sydney CBD to make it effective. The question that we believe needs to be asked is this - why would you spend billions of dollars on developing a new airport and then more billions of dollars on developing a high speed rail link to make that airport useful, when you could spend less money and bring to fruition the long held dream of the high speed rail link between Sydney, Canberra and Melbourne?
31. In their recent report on the implementation of high speed rail in Australia, the CRC for Rail Innovation strongly supported the proposition that Sydney's Airport capacity issues should be considered in conjunction with future high speed rail options. A high speed rail link could, amongst other things, assist in alleviating the current Sydney Airport issues by providing airline customers with easy access to Canberra Airport and at the same time replace literally



hundreds of flights per day into Sydney freeing up its precious slots.

32. If we are able to link Canberra to Sydney via high speed rail we will remove the need to find a second greenfields Sydney Airport, and at the same time we will create a transport and economic corridor down the NSW East Coast. This corridor would become an area of industry, population growth, commercial development, innovation and further infrastructure investment. It would be a corridor that is serviced by some of the best roadways in the country. It would be a corridor with first rate high frequency air services. It would be a corridor with a high speed rail link as its backbone. And it would be a corridor in which Sydney can grow – this corridor has none of the natural geographic and access problems that arise to the north of Sydney.

#### **Land Use Planning**

33. Canberra Airport strongly supports the initiative to consider a land use planning regime for airports around Australia, a regime that recognises that airports are critical pieces of national infrastructure that need to be protected. Indeed, if Canberra Airport is to play any role in the Sydney Airport solution as contemplated above it needs to be protected from inappropriate development.
34. In this regard, Canberra Airport agrees with the widely-held view that the current Australian Noise Exposure Forecast (ANEF) does not reflect community views on the effects of aircraft noise, is out-of-date in terms of responding to contemporary community values, is technically flawed, has not been designed to assess suitability for new development in Greenfields locations, is inappropriate for non-curfewed airports with 24 hour operations, and is unable to adequately explain aircraft noise impact to members of the community. While we have attached for your a previous submission that we have made detailing our concerns with the ANEF, the following main points should be noted:



- a. **As AS2021 relates to insulation requirements for existing developments, and is thus largely intended for brownfield sites, AS2021 implicitly assumes that houses have been or will be built under flight paths. Given this fundamental assumption behind the Standard, the ANEF system is by definition unsuited to Greenfields airports, especially where there are ample opportunities for new residential development well away from flight paths.**
  
- b. **As Australia grows economically and the standard of living improves, communities demand and become more concerned with issues of environmental quality. The ANEF was based on a 1980<sup>1</sup> survey of residents who had been pre-exposed to aircraft noise at a time when aircraft noise was a minor issue in Australia. Today, the community is significantly more sensitive to aircraft noise and is more prepared to use the political process to express its views. In this regard, a more recent (1997) social survey in Australia suggests that the reaction to aircraft noise was approximately 7 ANEF units higher than would be predicted from the ANEF model based on the 1980 survey.<sup>2</sup> This is likely to have changed further in the years between 1997 and today.**
  
- c. **Communities under flight paths have also been more prepared to use the political process to force changes to flight paths and to aircraft operating procedures. In Canberra, examples of changes influenced by communities using the political process include the introduction of the Noise Abatement Areas in 1995 and a range of other noise abatement measures to protect the Jerrabomberra community (located under the southern straight-in approach flight path but outside the Ultimate Capacity ANEF 20 and kilometres from the current ANEI 20 level). At other airports, often with communities located immediately adjacent to**

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<sup>1</sup> Hede, A, and R. Bullen, *Aircraft Noise in Australia: A Survey of Community Reaction*, NAL Report No. 88, February 1982.

<sup>2</sup> Mitchell McCotter, *Jandakot Airport Noise and Social Survey*, December 1997.



the airport (notwithstanding that in many cases the houses were built after the airport was established), more severe restrictions have become common, including curfews at Coolangatta, Adelaide, Essendon and Sydney Airports. Some residents around Canberra Airport are now also calling for a curfew on the Airport and noise sharing despite being well outside the ANEF 20 or even ANEC 15 contour.

- d. Use of the 20 ANEF contour as the boundary for new residential development (or 25 ANEF for development where appropriate insulation has been provided) has been based on a belief that noise outside the 20 ANEF contour is not significant, and is the point at which individuals start to rate road noises as more intrusive than aircraft noise<sup>3</sup>. This belief is both incorrect and misleading and leads to a serious distortion of the true impact of aircraft noise. The 1980 NAL survey<sup>4</sup> interviewed 3,575 residents living around the commercial airports in Sydney, Adelaide, Perth, Melbourne and the Richmond RAAF base, and found a number of features of annoyance and affection. At the 20 ANEF line:
- 42% of residents will be “moderately” or “seriously” affected
  - 11% of residents will be “seriously” affected
- e. The ANEF responds misleadingly to changes in flight numbers. That is, when flight numbers are increased, it can have little effect on the ANEF. The method that the ANEF uses to deal with the frequency of overflights has been challenged in a number of scientific articles and is the subject of some controversy. These have been surveyed in the NAL Report (p17-18) and in the Senate Select Committee Report (p198-200).

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<sup>3</sup> For an extensive list of attempts to mislead the public with these beliefs, see Senate Select Committee on Aircraft Noise in Sydney, *Falling on Deaf Ears?*, November 1995, pp203-207.

<sup>4</sup> National Acoustic Laboratories, *Aircraft Noise in Australia: A Survey of Community Reaction*, NAL Report No 88, February 1982, AGPS



- f. **The ANEF averages out the noise impact on an area over a whole year. Thus, if an area is subject to extremely high noise for a certain period (say, 5-7pm each weekday), then that will be averaged out over the entire week, giving the impression that noise in the area is not significant. The Sutherland Shire Council outlines the problem for people located under such noise patterns:**

**"The ANEFs are a statistical and political enigma designed to convey a picture of a best possible scenario. The human condition cannot average out over, over a year, the effects of pain. The human condition cannot average out over a year the effects of a severe infection. Similarly, the human condition cannot average out, over a year, the effects of noise" (Sutherland Shire Council to the Senate Select Committee)**

- g. **An examination of ANEFs for the same airport over time reveals that they vary considerably. Sometimes they expand over time, and sometimes they contract. This is even the case for Ultimate Practical Capacity ANEFs as the underlying Integrated Noise Model (INM) version may change, or aircraft types are updated to reflect additions to the model. This changes the shape of the ANEF contours, providing little or no certainty to landholders or land-use planning authorities in how to zone or deal with land surrounding airports – how can you possibly use a moving contour as the basis for making irrevocable planning decisions?**
- h. **As evidenced by existing complaints by residents around Australia, overnight flights have added potential to be disruptive to residents living under flight paths, and this includes residents that are beyond the ANEF 20 line. This is particularly the case given night freight activity may only involve a small number of aircraft per night, insufficient to trigger a "response" from the ANEF system, yet more than enough to disturb/wake a resident living directly under the flight paths.**



**35. Given the above flaws in the ANEF, Canberra Airport submits that a new land use planning regime for airports needs to be developed as a matter of urgency to protect Airports from inappropriate development justified by use of the ANEF system. This new regime may take into account a number of different approaches, including:**

- a. An assessment of the relevant Airport's Master Plan (as approved by the Commonwealth), which will itself contain information regarding noise and appropriate areas for development (this will be especially the case if the amendments to the Airports Act are passed with the new more detailed requirements for Airport Master Plans);**
- b. Flight path diagrams (of actual and proposed future flight paths) – as you are aware, Canberra Airport believes (based on our experience of noise complaints to the south of the Airport) that a true indicator of whether or not a person will complain about aircraft noise is whether or not that person is under a flight path;**
- c. N65 and N70 maps depicting the number of aircraft noise events over 65 and 70dBA  $L_{MAX}$  in the areas around airports (for actual and forecast future growth). Canberra Airport believes that these maps correct many of the flaws in the ANEF by focusing on the number of movements above a certain decibel range, rather than trying to undertake any type of averaging exercise;**
- d. Single Event Contours in the range of 65 to 85 dBA  $L_{MAX}$ , depicting the noise made by individual aircraft on selected flight paths;**
- e. ICAO's Balanced Approach to managing aircraft noise, an approach which looks at:**
  - Whether the airport is Greenfields v brownfields (built-in);**



- **Whether the airport is curfewed or curfew-free; and**
  - **Whether the airports has significant levels of General Aviation (GA) activity, especially training circuits;**
- f. Given the correlation between noise complaints and flight paths, Canberra Airport also supports a corridor-based approach for the management of aircraft noise. Indeed, Canberra Airport has applied the corridor based approach to its planning through the implementation of the Canberra Airport High Noise Corridor; and**
- g. The use of the ANEC 15 contour of an Ultimate Practical Capacity ANEF in conjunction with a corridor approach, as was proposed by the Commonwealth in the Badgery's Creek EIS. However a flight-path based Corridor would be the preferred option, noting the range of problems associated with using the ANEF approach.**
- 36. The point is mere reliance on the ANEF is not sufficient for complex planning decisions – there are a number of more accurate measures, and a merit based judgment of all these measures and all factors needs to be taken into account by relevant planning bodies.**
- 37. The proposed South Tralee development – a proposal to place residential development underneath flight paths of Canberra Airport – is a clear threat to the ongoing development and operation of Canberra Airport and its role in assisting meeting Sydney's aviation needs. It is in fact a case in point as to why further protection measures are needed for Australian Airports. Consider this, South Tralee complies with the requirements of the ANEF yet:**
- **South Tralee is under the flight paths of Canberra Airport;**
  - **people in the area of Tralee and indeed, further away from Tralee, already complain about aircraft noise;**



- **members of the community in the region of Tralee and Environs have already called for operational restrictions on Canberra Airport – yet more housing is being proposed for the area;**
- **we have received a petition from members of a community further south than Tralee and Environs complaining that the noise that they are subject to is unacceptable and that a curfew and/or other operational restriction at Canberra Airport is required. This petition was signed by over 250 people representing approximately 75% of the households in the Royalla, Fernleigh Park, and Mt Campbell area – all of which are further from the Airport than South Tralee;**
- **there has been a history of moving flight paths away from Jerrabomberra to the area of Tralee because the Jerrabomberra Community were unhappy with the level of aircraft noise;**
- **the operations at Canberra Airport will inevitably grow with time – regardless of what that level of growth is and regardless of whether people think the growth is optimistic – and with this growth, aircraft noise will only increase; and**
- **Airservices monitoring already shows that there are between 35–40 flights a day over Jerrabomberra above 65 decibels – Tralee will be subject to more noise given it is directly under the flight paths, and the numbers of flights will only grow as the Airport grows and the aircraft mix changes with larger, louder, aircraft.**

**38. If Airports are to develop as true infrastructure assets to service the country, we need to develop a system of land use planning that protects the operations of those airports. We do not support a system of “quarantining” land around Airports, all we ask is that all relevant planning bodies review proposed developments in their proper context, have regard to all relevant information,**





**and resist the notion that noise sensitive developments are compatible with Airport flight paths.**