



- 8 MAY 2009

Googong Residents Group
C/o Mr Dirk Navara
PO Box 1039
QUEANBEYAN NSW 2620

Ms Kathy Aves
Canberra Airport
2 Brindabella Circuit
Brindabella Business Park ACT 2609

Dear Ms Aves

Re: Canberra Airport 2009 Preliminary Draft Master Plan.

The Googong Residents Group (GRG) appreciates the opportunity to comment on the proposed 2009 Canberra Airport Draft Master Plan (CADMP).

The GRG represents residents who live in Fernleigh Park, Mount Campbell, Little Burra and Royalla (hereafter referred to as the "noise affected area"), who are currently, or who are expected to be, subject to regular aircraft related noise events.

Based on ABS data the GRG estimates that between 2,000 and 3,000 individuals live in the noise affected area (noting that this estimate excludes people in Jerrabomberra and North Canberra who are also affected by aircraft noise).

Residents in the noise affected area will be directly and adversely impacted by the proposed increase in the volume of air traffic, the modified noise abatement areas and by the proposal to allow aircraft to land and take off during the night.

1.0 Summary of concerns

The GRG is concerned that:

1. To the GRG's knowledge no long term residents in the noise affected area were consulted by the CIA regarding the proposed establishment of the High Noise Corridor or noise abatement areas;
2. CADMP mapping of noise affected areas is not accurate;
3. Increased noise pollution in the noise affected area will adversely impact on the quality of life of residents;

4. Many homes located within the noise affected area were constructed prior to the date of the proposed HNC, and are not sufficiently insulated to adequately deal with aircraft noise;
5. Increased aircraft emissions may have an adverse impact of on the quality of rainwater sourced drinking water;
6. The above issues will have a negative impact on property values in the noise affected area;
7. The CIA has proposed the introduction of night operations for large and noisy aircraft which will impose major social and economic costs on the residents of the noise affected area, without any real prospect of generating significant sustainable benefits for the greater Canberra community. The justifications are self serving and in many cases based on inaccurate, incomplete or illogical positions;
8. The CAPDMP omits projections of night movements of passenger aircraft even though they represent 96% of all movements at Canberra International Airport;
9. The imposition of restrictions on land zoning created by the self declared High Noise Corridor compromises the NSW Government land use approval system which directly impacts the rights of residents in the noise affected area;
10. The CIA has confirmed that it has not conducted an analysis of the social or economic costs to residents in the noise affected area; and
11. The CIA is able to pursue its commercial ambitions, to the detriment of residents in the noise affected area, without those residents having recourse for financial loss and negative impacts on lifestyle, suffered as a result of the CIA's commercial expansion.

2.0 Proposed actions to be taken by the CIA.

The GRG considers that the CIA must undertake each of the following actions to ameliorate the impact the CADMP initiatives will have on residents in the noise affected area:

1. Impose a noise curfew from 11pm to 6am except in the case of genuine emergency.
2. Reintroduce noise sharing so that the burden of aircraft noise is shared by all members of the community.
3. Redefine flight paths to track aircraft further to the west of the current noise affected area along the path used by jets taking off to the south of the airport, and to increase the height of aircraft on approach. The GRG understands that alternate flight paths could be followed if the navigation

beacon to the south of the Airport was relocated or if aircraft were required to use GPS navigation devices¹.

3.0 Detailed discussion of concerns

3.1 To the GRG's knowledge no long term residents in the noise affected area have been consulted with by the CIA regarding the proposed establishment of the High Noise Corridor.

Many residents in the noise affected area have lived in the area for 20 years or more. To the GRG's knowledge no resident has ever been involved in a consultation process about the proposed HNC or about the CIA's intentions to implement noise abatement areas that effectively concentrate aircraft noise in the noise affected area.

The bulk of residents in the noise affected area only became aware of the CIA's intention to establish the HNC and upgrade its operations when 2 concerned residents undertook a letterbox drop alerting local residents to the CIA's plans. Following this action over 400 local residents signed a petition (see attached) opposing the CIA's expansion plans. Virtually none of these residents were aware of what channels they could go through to engage the CIA in relation to the aircraft noise issue.

The GRG does not dispute that the CIA may have published notices in newspapers or hosted public meetings regarding the HNC². The GRG also notes that the CIA appears to have proactively consulted with Canberra residents from suburbs not affected by aircraft noise and considers that the CIA has been selective in its consultations so it can present the image that it has broad community support for its plans.

Given the experiences of the longer term residents the CIA's approach to community consultation has clearly failed to reach those people in the community most likely to be adversely affected by the CIA's plans.

3.2 Mapping of noise affected areas is not accurate.

The CADMP states that apart for about 500 Jerrabomberra residences aircraft noise is predominately confined to rural areas. The implication is that noise

¹ If changes to flight paths resulted in aircraft operators incurring increased operating costs these costs should be reflected in ticket/freight prices; that is airport operations should be designed to minimise the negative impacts on residents, not to minimise the cost of air travel at the expense of residents.

² At a recent community meeting a CIA representative, who was questioned about the lack of consultation with residents from Fernleigh Park, expressed the sentiment that Fernleigh Park residents "must not read the paper" for them to remain unaware of the consultation processes. The GRG notes that the CIA publishes notices in the Canberra Chronicle, which is not delivered to Fernleigh Park.

does not affect residents other than in Jerrabomberra. This is incorrect as between 2,000 and 3,000 people live in rural residential developments under, or adjacent to, the flight paths to the south of the CIA that are exposed to aircraft noise on a regular basis.

The GRG accepts the Commonwealth's assessment that external noise exposures above 65dBA are at a level where aircraft noise becomes intrusive. The GRG also considers that where the frequency of noise events exceeds an average of around 20 per day (i.e. more than once every daylight hour) residents need to seek respite from that noise. Many residents in the noise affected area are already exposed to 50 or more 65dBA + aircraft related noise events each day.

The GRG notes that while the CIA claims that the HNC approximately maps to the 65+ dBA impact area³ the approach paths of aircraft are highly concentrated over areas to both the south and east of the southern boundary of the HNC⁴. GRG members live directly under these commonly used flight paths, which are outside the HNC, and are regularly exposed to intrusive aircraft noise.

The GRG considers that the single event contours presented in Chapter 14 of the CAPDMP materially misrepresent the true noise footprint produced by current and future aircraft movements. Curfew 4 Canberra have conducted significant independent testing and demonstrated routine N65 noise events across suburbs well removed from the claimed N65 boundary, such as Hackett.

One GRG member, whose property is at Little Burra and well outside the existing 65dBA contour, measured aircraft noise at his residence using a newly purchased sound level meter rated to an accuracy of + or - 2 dBA. He measured over 50 aircraft related noise events exceeding 65dBA in one day, with the loudest noise event peaking at 81dBA. This result calls into serious question the accuracy of the current noise map.

The GRG also understands that the noise shadow mapped by the noise model used to generate the maps estimates noise at sea level, not ground level. Accordingly, where the ground level is significantly higher than sea level, and the aircraft is flying relatively low over the ground, the model significantly underestimates the size and intensity of the noise shadow cast by the aircraft.

The GRG estimated the heights above ground level, at a location just south of Mount Campbell, of a sample of planes that landed at CIA on the 21st of January 2009 and showed that while the height above sea level was around 1,400 meters the height above ground level was less than 700 meters. The GRG considers that the assumptions underpinning the noise maps are flawed.

³ CADMP, at page 176

⁴ CADMP, Figure 14.5 at page 186 and figure 14.6 at page 187

The GRG also notes that the future noise forecasts (per figure 14.12 of the CADMP) are based on assumptions about issues such as aircraft type and design, glide paths etc and notes that the forecast shows that a significantly larger area than the current HNC will be subject to regular 65+dB(A) noise events.

In view of these issues the GRG considers that the assertion that the HNC is the only area affected by intrusive aircraft noise would be grossly misleading.

3.3 The adverse impact of increased noise pollution on the quality of life of residents in the noise affected area.

The GRG notes that the degree to which aircraft noise impacts affected residents depends on a number of factors; including:

1. The altitude and track of overflying aircraft;
2. The types of aircraft, whether they are on approach or departure and pilot controlled settings of each of the aircraft;
3. The frequency with which aircraft fly over the affected area;
4. The times of day that aircraft fly over the affected area;
5. For inside noise, the design and construction of the residence, particularly in relation to factors that affect noise insulation such as ceiling insulation, window types and sizes and the type of external cladding (see comments under section 3.3 below).

The GRG notes that the CADMP proposes that:

- There will be a further concentration of aircraft departure and approaches in the high noise corridor to be achieved through the proposed strengthening of the noise abatement areas that will further restrict aircraft flight paths to the HNC.
- Traffic volumes (passenger and freight) at the CA are expected to grow at an annual compound rate of about 4.2% over the next 20 years. If these projections are achieved air traffic volumes will increase (from current volumes) by about 51% over the next ten years and by about 128% over the next 20 years.
- International flights will commence using the airport in 2010 (the GRG expects that some international flights may use large noisy aircraft such as "Jumbo jets")
- There will be increased aircraft movements between 11pm and 6am (estimated to rise from 5 to 25 per night over the next 20 years) so that, on average, a plane will fly in or out of the CIA every 16.8 minutes between 11pm and 6am.
- There will be an increase in air freighter traffic, which the GRG expects will involve the use of older noisier aircraft.

Accordingly the GRG expects that implementation of the CADMP will materially increase the frequency and severity of aircraft related noise pollution in the noise affected area and that the extension of the CIA's operating hours to 24 hours will increasingly result in noise pollution between the hours of 11pm and 6am.

The GRG notes the CIA's intention to restrict aircraft flight paths so that the majority of Canberra and surrounding residents are protected from adverse aircraft noise. While this reflects CIA's desire to minimize the impact of its operations on as many residents as possible, the approach of "protecting the many" will materially increase the impact of noise on the 2,000 to 3,000 residents living under the restricted flight paths. The GRG considers that protecting the majority from aircraft noise at significant expense to the minority is totally unfair and can not be justified.

The GRG notes that local councils across Australia have enacted laws restricting excessive noise after specified hours (usually 10pm). Those adversely affected by events, such as loud parties, are able to lodge complaints with the police, who have the legal authority to intervene to reduce noise impacts. These laws reflect society's common view that people are entitled to an uninterrupted nights sleep. The GRG consider that allowing the CIA to operate on a 24 hour basis will deny residents in the noise affected area the right to a decent nights sleep.

3.4 Many of the homes located within the noise affected area were constructed prior to the date the HNC and noise abatement areas were proposed and are not built with aircraft noise insulation requirements in mind.

The GRG notes that the CIA considers that residential developments in the HNC should not be allowed to go ahead. For example the CADMP states that:

"Because of the very high levels of aircraft noise in the [High Noise] Corridor, it is unsuitable for residential development or other sensitive uses"⁵, and

"The High Noise Corridor is an area unsuitable for residential development and Canberra Airport is committed to ensuring that through the use of the High Noise Corridor Canberra and Queanbeyan residents remain free from noise sharing."⁶, and

"Canberra Airport maintains that no housing should be permitted in the High Noise Corridor..."⁷.

⁵ Canberra Airport CAPDMP page 170.

⁶ Canberra Airport CAPDMP page 170.

⁷ CAPDMP page 193.

As noted in section 3.2 above the GRG considers that the CIA contention that the HNC is the only area affected by invasive aircraft noise is incorrect and believes that the area affected by regular 65dBA + noise events is far larger than that depicted in the CADMP.

Given that the CIA clearly considers that the measures proposed in the CADMP will make the HNC "unsuitable for residential development" the GRG can not understand why it should be acceptable for the CIA to unilaterally impose levels of aircraft noise pollution on those already living in the HNC (and additional area affected by regular 65 dBA + events not accurately reflected in the CADMP), particularly given that the bulk of these residential properties were established before the CIA either acquired the airport or proposed the noise abatement approach that has channeled the bulk of noise pollution over a small area.

The GRG absolutely rejects the notion that a privately owned ACT company should have been allowed to impose invasive levels of noise pollution on NSW residents in the noise affected area, so that residents of the ACT can remain noise free.

The GRG notes that clause 69(3) of the *Queanbeyan Local Environmental Plan 1998* requires that the Queanbeyan County Council (QCC) will not grant development consent for new developments located in designated areas, which include the noise affected area, unless the QCC is satisfied that the proposed building satisfies the provisions of AS 2021-2000 (Acoustics–Aircraft Noise Intrusion–Building Sitting and Construction)⁸. In particular AS2021-2000 specifies the need for domestic cooling, so that windows can be left closed in summer, and the type and size of windows. The GRG understands that the QCC only recently commenced applying this requirement in response to the proposed HNC.

Advice received from the QCC and from local builders is that compliance with AS2021-2000 is likely to increase the cost of building a new residence by as much as 10% and that the cost of insulating an existing home could be as high as \$100,000 in the extreme case where the home needed all of its windows replaced with double glazed windows and needed in-roof noise insulation installed.

The CIA is clearly conceding that their commercial intentions will make many homes in the noise affected area unsuitable for habitation. The GRG are concerned that there is no proposal for compensation for these losses, or a mechanism by which an existing resident can be recompensed for the damage caused by the airport's actions or those of its clients (aircraft operators).

⁸ The QCC has advised the GRG that any development applications to extend existing residences in the affected area must now comply with AS 2021-2000. In practice this means that a proposed extension (e.g. an extra bedroom) needs to comply with the standard even through the original residence does not apply.

The GRG also notes that while respite from aircraft noise inside a dwelling can be obtained via the installation of noise insulation, most people living in the noise affected area do so because they wish to take advantage of the outside lifestyle opportunities made available on rural residential blocks. Accordingly, noise insulation can only ever partially solve the noise problem. Some residents consider that increased exposure to noise will effectively confine them "as prisoners" inside their own houses.

3.5 Increased aircraft emissions may have an adverse impact of on the quality of rainwater sourced drinking water.

Town water services are not available to residents living in the noise affected area and virtually all homes in the area rely solely on rain water for domestic consumption⁹.

Residences located under or near to the high aircraft density approach and departure flight paths are subject to a high concentration of airborne pollutions emitted from aircraft engines¹⁰. Depending on weather conditions particulate matter and other pollutants emitted by aircraft may settle on the rooftops of residences and subsequently wash into the rainwater tanks containing water for domestic consumption.

3.6 The above issues will have a negative impact on property values in the noise affected area.

Increased aircraft noise and emissions pollution will negatively impact on the quality of life enjoyed by residents in the noise affected areas and this impact will be reflected in reduced property values.

⁹ During periods of drought rain water supplies may be supplemented with town water that is couriered in by water carriers.

¹⁰ Pollutants emitted by aircraft include Freon 11, Freon 12, Methyl Bromide, Dichloromethane, cis-1,2-Dichloroethylene, 1,1,1-Trichloro-ethane, Carbon Tetrachloride, Benzene, Trichloroethylene, Toluene, Tetrachloroethene, Ethylbenzene, m,p-Xylene, o-Xylene, Styrene, 1,3,5-Trimethyl-benzene, 1,2,4-Trimethylbenzene, o-Dichlorobenzene, Formaldehyde, Acetaldehyde, Acrolein, Acetone, Propinaldehyde, Crotonaldehyde, Isobutylaldehyde, Methyl Ethyl Ketone, Benzaldehyde, Veraldehyde, Hexanaldehyde, Ethyl Alcohol, Acetone, Isopropyl Alcohol, Methyl Ethyl Ketone, Butane, Isopentane, Pentane, Hexane, Butyl Alcohol, Methyl Isobutyl Ketone, n,n-Dimethyl Acetamide, Dimethyl Disulfide, m-Cresol, 4-Ethyl Toulene, n-Heptaldehyde, Octanal, 1,4-Dioxane, Methyl Phenyl Ketone, Vinyl Acetate, Heptane, Phenol, Octane, Anthracene, Dimethylnaphthalene (isomers), Flouranthene, 1-methylnaphthalene, 2-methylnaphthalene, Naph-thalene, Phenanthrene, Pyrene , Benzo(a)pyrene, 1-nitropyrene, 1,8-dinitropyrene, 1,3-Butadiene, sulfites, nitrites, nitrogen oxide, nitrogen monoxide, nitrogen dioxide, nitrogen trioxide, nitric acid, sulfur oxides, sulfur dioxide, sulfuric acid, urea, ammonia, carbon monoxide, ozone, particulate matter (PM10, PM2.5) (refer <http://www.lead.org.au/Lanv7n3/L73-4.html>).

The impact of noise pollution on property values has been demonstrated in the past studies undertaken on the effects of aircraft noise on the values of properties located near the Sydney airport. For example, a study undertaken by the Bureau of Transport Economics (BTE) in 1971¹¹ concluded there was a statistically significant relationship between aircraft noise and house prices (with property values suffering in higher noise areas) and that the relationship between noise and house prices was probably stronger for higher priced houses¹².

Given that the majority of homes in the noise affected area are priced in the upper quartile of the Canberra property market (i.e. from \$700,000 to \$1,000,000) the impact on property prices is likely to be significant.

3.7 The CIA has proposed the introduction of night operations for large and noisy aircraft which will impose major social and economic costs on the residents of the noise affected area, without any real prospect of generating significant sustainable benefits for the greater Canberra community. The justifications are self serving and in many cases based on inaccurate, incomplete or illogical positions.

The GRG considers that many of the claims, projections, and statements supporting the CIA intentions as presented in the CAPDMP are fundamentally flawed and unsupported. Access Economics have also conducted and published a peer review of the CAPDMP and have identified a series of deficiencies. These inaccuracies and unsupported claims act to generate serious doubt as to the potential benefits and reported impacts of the measures defined in the CAPDMP.

The GRG further consider that the disinformation provided within the CAPDMP acts to the financial benefit of the airport owners at the detriment of residents living in the noise affected area.

The GRG notes the following problems with the CADMP:

a. Air Freight.

The CAPDMP proposal to establish an overnight freight hub appears to contradict actual market drivers and fundamental economic principles:

- (i) The establishment of an overnight freight hub at CA will not of itself create additional demand for air freight. Accordingly, air freight operations attracted by the proposed "freight hub" will be at the expense of operations conducted at Sydney, Brisbane and Melbourne. The Preliminary Draft Master Plans for each of these airports demonstrate an intention for each airport owner to grow freight as a source of revenues.

¹¹ The BTA study can be viewed at <http://www.bitre.gov.au/publications/46/Files/OP007.pdf>

¹² See page 27 of the BTA report

Most have already invested heavily in infrastructure to supply expected growth. The market domination approach proposed by CIA is likely to be challenged by the other airport owners.

- (ii) Since the establishment of a freight hub will not of itself create additional demand for freight, the transfer of freight operations to Canberra will simply result in a transfer of jobs from other locations and industries and will not result in an overall increase in national employment. Further, the supply of additional capacity into a marketplace already operating well below capacity can only result in economic inefficiency and either higher freight prices as airports seek recovery of infrastructure costs, or strategic reduction in freight capacity at the capital city airports. The PDMPs of each capital city airport show not such intentions.
- (iii) Creation of a freight hub at the CIA will increase the cost of freight. Demand for international airfreight services is approximately proportional to population size. Accordingly, highest demand occurs at capital cities. Each state capital is currently serviced by direct airfreight services from international destinations with freight to smaller destinations predominantly distributed as lower deck freight on passenger aircraft already operating to end user destinations. That is, international airfreight is already delivered directly to the consumer market ensuring the minimum cost of delivery and where onward distribution is required the majority is carried on existing passenger services, again with the objective of minimising delivery cost. The introduction of an international freight hub at Canberra introduces additional travel sectors for freight traveling to any destination other than Canberra. This additional handling would introduce additional costs not present in current distribution models. Given the highly cost competitive nature of airfreight services, the development of Canberra as a sustainable freight hub seems to contradict contemporary economic wisdom.
- (iv) The CA claim that "the network based system requires more aircraft, including less efficient, smaller and older aircraft to operate more flights, hence increasing overall fuel burn, increasing emissions and hence raising the cost of airfreight"¹³. This claim is contrary to logic. While ever passenger aircraft operators can recover the costs of their services by providing travel for passengers, freight will always represent a marginal revenue opportunity at a cost level that dedicated freight operators are unlikely to match. Indeed, the Sydney airport Draft Master Plan of 2003/04 states that 80% of freight is carried in the hold of passenger aircraft, and that despite a projected annual increase in freight aircraft movements at Sydney Airport of only 1.3% the average annual projected increase in freight volume is 3.8%¹⁴. This shows SACL's expectation that this distribution method will continue as the dominant model in

¹³ CAPDMP at page 70.

¹⁴ Sydney Airport Draft Master plan, Page 50, Para 5.5 and page 51.

Australian Airfreight. The GRG believe that this is because the model offers better cost efficiency (and lower environmental footprint) than the dedicated freight aircraft model.

- (v) To address some of the obvious inefficiencies the CAPDMP supports a proposed high speed rail link. Access economics have calculated that the cost of developing Goulburn Airport to support freight operations is far lower than the cost of a VHST¹⁵.

b. General

The Projections of Practical Ultimate Capacity (PUC) within the CADMP represent movement numbers well in excess of those currently experienced by Gatwick Airport in the UK, which is currently the busiest single runway airport in the world. Gatwick currently serves a city of some 14 million people. CIA serves a projected population of around 500,000 people. The GRG questions what is going to drive all the additional demand in Canberra?

Table 5.6 of the CAPDMP provides a forecast of the future growth in aircraft movement numbers at the CIA. This table and Section 5 of the CADMP in general ignores the fact that movements of RPT aircraft at CIA have been approximately static (varying between 35,000 and 40,000) for the past 7 years.

c. Environment

The CIA has confirmed that carbon emissions in respect to sectors operated by commercial aircraft are attributed to the airport of departure¹⁶. Based on the projection of commercial aircraft movements presented in the CADMP and assuming the average aircraft is of a size compatible with the average projected passengers per aircraft, the carbon emissions attributable to Canberra Airport in 2029 will constitute 158% of the emissions target for the whole of the ACT¹⁷.

In view of the above the GRG considers that the community benefits associated with the measures proposed in the CADMP are based on incomplete, inaccurate and flawed information and are therefore misleading. No estimate of the social and economic costs to residents in the noise affected area has been included in the CADMP but the GRG strongly believes that these impacts will not offset by the genuine community benefits of the CIA's proposed expansions and the CADMP proposals are therefore not justified.

¹⁵ Access Economics Review of Canberra Airport Preliminary Draft Master Plan and the High Noise Corridor Concept, dated 20 March 2009, page 5.

¹⁶ Confirmation provided by Mr. Noel McCann during the community awareness meeting convened by Mr. Shane Rattenbury, MLA, Thursday 30 April

¹⁷ Information courtesy of Climate Action for Canberra.

3.8 The CAPDMP omits projections of night movements of passenger aircraft even though they represent 96% of all movements at Canberra International Airport.

The GRG notes that the CADMP includes projections of the movements of freight aircraft at night in section 6, however, we also note the lack of similar detail in respect to passenger aircraft movements in section 5. Noting that passenger operations account for more than 95% of all current movements at Canberra Airport, the GRG questions why the CIA has failed to provide this critical information.

GRG questions whether CA has made a deliberate attempt to obfuscate this issue by focusing on the comparatively small number of freight movements and omitting to identify the true extent of intended future night operations at CIA.

Further, GRG notes that passenger movements are projected to increase at an average annualised rate of approximately 4.4% and aircraft movements at some 3% implying that the CIA expect a higher average number of passengers per plane. The GRG considers that this will mean that the average size of aircraft (and therefore the average noise per movement) must also increase.

3.9 The imposition of restrictions on land zoning created by the self declared High Noise Corridor compromise the NSW Government land use approval system which directly impacts the rights of the Noise Effected Residents.

In unilaterally imposing an unprecedented High Noise Corridor the CIA also requires that NSW land within the HNC is excluded from residential development to ensure the remainder of the Canberra Community will be free from the prospect of noise sharing. The CIA claims this land to be currently free of residents so that readers of the CADMP would see logic in the CIA proposal. Whilst the CADMP focuses on the existence of Jerrabomberra it excludes recognition of other residential communities within the proposed HNC.

As previously stated Australian census information shows that more than 2,000 additional residents already exist within the area directly under or adjacent to the proposed HNC, in the communities of Fernleigh Park, Little Burra, Mt. Campbell, Royalla and Googong. This apparent oversight demonstrates a willingness by the CIA to ignore the rights of residents in the noise affected area.

Further, the land within the HNC and external to Jerrabomberra is already zoned residential. The airport's claims that aircraft noise is an unacceptable impost on the residents of the ACT should therefore apply equally to those residents of NSW that reside within or adjacent to the proposed HNC.

3.10 GRG note that CIA has confirmed that it has not conducted an analysis of the social or economic costs to the Noise Affected Residents.

The CIA clearly acknowledges the impact of noise pollution and has taken actions to reduce the impact on most of the ACT population, but at no time has any study been undertaken to identify or quantify the impacts these actions will have on those 2,000 to 3,000 residents who will be adversely affected.

The GRG consider it incomprehensible that State and Federal government regulations require environmental impact studies to be undertaken to protect the habitats of native flora and fauna from proposed commercial activity, while the CIA appears to be able to dump various forms of pollution on a large population of human residents without any human impact studies being undertaken.

3.11 The CIA is able to pursue its commercial ambitions, to the detriment of residents in the noise affected area, without those residents having recourse for financial loss and negative impacts on lifestyle, suffered as a result of the CIA's commercial expansion.

The GRG notes that in pursuit of its operating objectives the CIA may adopt operational practices that impose "externalities" on other members of the community, who have little or no opportunity to influence the CIA's conduct.

The GRG acknowledges that the directors of the CIA operating company have a duty to maximize the wealth of their investors so that while the CIA must operate within the constraints placed on it by Government legislation it will pursue strategies that achieve this fundamental financial imperative.

The GRG notes therefore, that choices made by the CIA in relation to its operations will ultimately be determined by commercial, not community, considerations, unless the CIA is constrained by legislation. Put another way, the GRG expect that where there is a conflict between its own commercial interests and the interests of other members of the community, the CIA will always act to further its own commercial interest, and not in the community's best interests unless forced to do so.

The GRG considers that it is totally inequitable for a private company to be allowed to unilaterally impose significant negative externalities on a large number of residents.

The establishment of the HNC is an example of an operational strategy that imposes externalities on members of the community. While the HNC and noise abatement procedures protect the bulk of the community from the adverse impacts of aircraft noise, it does so at the expense of the thousands who live in or near the HNC. While the CIA purports to have engaged in community consultation about the HNC, to our knowledge no GRG members have had any

contact from the airport alerting them to the fact that the introduction of the HNC will materially adversely impact their quality of life.

The GRG again notes that the CIA has confirmed that it has NOT conducted an analysis of the social or economic costs to the Noise Affected Residents¹⁸.

4.0 Conclusions

The GRG considers that:

- The CIA is duty bound to directly and proactively consult with those residents likely to be negatively impacted by the CIA's plans.
- The CIA has not fulfilled its obligations to consult with the community as it has not properly consulted with all affected sections of the community.
- In view of the absence of past consultation, decisions already taken by the CIA and approved by the Commonwealth that adversely impact on residents should be reopened for discussion and review.
- The Commonwealth should not accept that the CIA has effectively consulted with the community unless representatives from all affected communities provide written confirmation to that effect.
- The CADMP materially understates the levels of aircraft noise experienced in the noise affected area.
- The implication (in the CADMP) that aircraft noise is predominantly limited to the proposed HNC is untrue.
- The CIA has attempted to depict a noise environment that supports their commercial intentions while the reality is that the true footprint currently experienced by the community well exceeds the CIA claims.
- If the CADMP is to offer valuable information for the purposes of assessing the impacts of proposed developments a truly independent noise survey needs to be conducted across Canberra and the noise affected area over an extended period of time and a fresh Single Noise Event contour map produced.
- The GRG considers that the increased concentration of aircraft noise, increased frequency of noise events and implementation of 24 hour operations will materially and adversely impact the quality of life enjoyed by around 2,000 to 3,000 residents living in the noise affected area.
- The proposed noise abatement area changes will further concentrate aircraft related pollution on the 2000 to 3000 residents living in the noise affected area and this is unjust and inequitable.
- The imposition of intrusive noise between 11pm and 6am is inconsistent with established community standards.

¹⁸ Confirmation provided by Mr. Noel McCann during the community awareness meeting convened by Mr. Shane Rattenbury, MLA, Thursday 30 April.

- The CIA considers that it is unacceptable to build new residences in the HNC, but at the same time is seeking to implement changes to its operations that will expose existing residences in and adjacent to the HNC to unacceptable levels of aircraft noise. This reflects the fact that the CIA is motivated entirely by its commercial considerations and is unwilling to recognise the negative impacts its operations have on members of the community.
- Many homes in the noise affected area were constructed prior to QCC's adoption of AS2021-2000 and are not sufficiently insulated against aircraft noise, nor have air conditioning systems that allow windows to be closed in summer. Residents in the noise affected area now find themselves exposed to increasing levels of noise pollution while their homes are not properly insulated to deal with that pollution.
- The cost of insulating existing homes in the noise affected area is likely to be very significant and it is unfair to expect residents to bear these costs given that they had no say in the imposition of the noise pollution.
- The increased air traffic volumes anticipated by the CADMP will increase exposures to aircraft emissions and further negatively impact the quality of drinking water sourced from rooftops of residences in the vicinity of the approach and departure flight paths.
- Increased pollution associated with implementation of the CADMP will materially and increasingly adversely affect property values in the noise affected area.
- The commercial assumptions on which the CADMP is based appear to be inaccurate, incomplete and illogical and constructed to present as strong an argument as possible for the potential "social and economic benefits" associated with the CIA's planned expansion.
- Adoption of the CADMP would place the NSW government in the position of being dictated to by a privately owned ACT company.
- The CIA requirement for a change in zoning is contrary to the constitutional rights and responsibilities of the NSW government. Indeed, the direct pressure the CIA proposals place on government planning processes and the rights of existing residents counters the common law rights of those residents.
- An independent study must be undertaken to assess the likely social and economic impact adoption of the CIA CADMP is likely to have on residents in the noise affected area.
- Adoption of the CADMP will unilaterally impose material externalities (i.e. in the form of the lifestyle and financial impacts detailed above) on residents in the noise affected areas and that this is totally unjust.
- The GRG considers that the externalities imposed by the CIA must be avoided through the adoption of noise sharing, a noise curfew and through the use of modified flight paths.

5.0 Contacts for further information

The following members of the GRG may be contacted in relation to this submission.

Mr. Dirk Navara	02 6299 5353
Ms. Kerrie Westcott	02 6299 0173
Ms. Melinda Roughsedge	02 6299 0678
Mr. Tim Drown	02 6299 0915
Mr. Richard Nivan	0419 426 914
Mr. Mick Krzeminski	02 6299 4609

The GRG notes that in accordance with the requirements of Subsection 79(2) of the *Airports Act 1996* the Canberra International Airport (CIA) is required to provide a copy of these comments, along with a summary of these comments, to the Hon. Anthony Albanese MP, Minister for Infrastructure, Transport, Regional Development and Local Government.



(Original signed)

Mr Dirk Navara
Googong Residents Group

PETITION FOR NOISE SHARING AND FLIGHT CURFEW FOR CANBERRA
INTERNATIONAL AIRPORT

We the residents of the Googong, Fernleigh Park, Little Burra, Mount Campbell and Royalla areas in the Queanbeyan region, are currently suffering most of the effects of aircraft noise on behalf of the whole Canberra/Queanbeyan community.

What is proposed?

The Canberra International Airport's 2009 draft policy includes recommendations to create;

- the introduction of International flights (including 747 aircraft etc);
- a 24 freight hub for Canberra;
- a venue to take the air traffic overflow from Sydney Airport; and
- a flight curfew, but only over the areas which are currently designated as 'noise abatement areas'.

What will be the effects for us?

The ramifications of this policy for us if implemented, is that;

- there will be no curfew introduced whatsoever over areas now deemed to be 'a high noise corridor', which is where we currently reside; and
- the number of aircraft flying directly over us will not only increase drastically, but flights will be taking off and landing 24 hours a day.

We, the undersigned, therefore support the immediate re-introduction of both a noise sharing policy, and that a curfew be introduced to the Canberra International Airport so we may enjoy the same quality of life as other Australians. We should not have to be the select residents who are burdened with the majority of aircraft noise.



- 8 MAY 2009

