

Canberra Airport  
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Canberra Airport ACT 2609

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**Submission: Canberra Airport - 2009 Draft Master Plan**

The Gungahlin Community Council Inc (GCC) is an incorporated, not for profit, community-based association operating within the Gungahlin region of the Australian Capital Territory.

GCC is formally recognised by the ACT Government as an official conduit for community input and ideas interchange to Government and related agencies.

The district represented by GCC covers an area in the north to northwest of the Territory between the ACT–NSW border and the Barton Highway, and Federal Highway to the south and east.

The objective of GCC as defined in its constitution is:

*To preserve and improve the social, cultural, economic and environmental well-being of Gungahlin and the Gungahlin community.*

In line with achieving these objectives, the GCC provides the following submission on the Canberra Airport Draft Master Plan 2009. If confirmation of any of the matters discussed in our submission are required, I can be contacted at **president@gcc.asn.au**.

Thank you for the opportunity to provide input.

Sincerely,



Alan Kerlin  
President – Gungahlin Community Council



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## Overview

GCC provided a comprehensive submission on the Canberra Airport's Draft Master Plan 2008. We find that many of the key issues and concerns we raised in that submission remain of concern with the redrafted 2009 version.

We acknowledge the important role that the Canberra Airport plays in the economic and social well-being of the Canberra community. But we also recognise that the expansion of activities proposed in the draft Master Plan represent significant economic return for the Airport over and above current and projected growth, at the expense of significant negatives for the Canberra community. This would come about in ways that would never have been possible before the previous Federal Government sold off airports to private interests. What is currently a two-way 'partnership' risks becoming very one-sided, to the detriment of local lifestyles.

We believe that it is entirely appropriate that the future development of the Canberra Airport is provisional on a 'quid pro quo'. The second sentence of the draft Master Plan starts 'With community support...' However, such support is a two-way deal.

GCC, along with numerous other Canberra community groups, believe that airport operations should be subject to a form of curfew that would guarantee the public a nightly period of respite from jet aircraft noise. Such a curfew should be established sooner rather than later, firstly because it is far easier to achieve earlier, secondly because it would give all related businesses complete certainty to invest in airport-related operations without concern about the 'goalposts being shifted' at some point in time. Without a curfew in place, that uncertainty will always remain, because the community campaign to bring about a curfew will be ongoing. Such ongoing uncertainty will itself have a limiting influence on investment in airport-related business.

Although it is beyond the purview of the Master Plan, GCC takes this opportunity to register our concern with the legislation that governs this process. The Airport is now a private enterprise, yet the legislation still requires the airport operator to conduct the entire master plan consultation process – drafting, consultation, receipt of submissions, and objective redrafting to mitigate concerns raised in submissions. To expect completely objective handling of such a process by the proponent is quite unreasonable – the inherent conflict of interest is unavoidable. It is akin to allowing major development proponents to self-certify. How would the Airport management feel if Bob Winnell was assessing his own Tralee rezoning application?

GCC calls on the Australian Government to overhaul the Airports Act to introduce master plan assessment conducted by the government.

Following are our more specific concerns and observations for the proposed 2009 Master Plan. Except where there is the possibility or likelihood of adverse community impact, we have not commented on ongoing airport operational matters.

## Chapter 2 – Economic impact

- There is little separation of statistics for airport-related economic impacts versus those of airport-located but unrelated operations. Section 2.1 for instance discusses the '8000 jobs currently located on-airport' but clearly this includes a majority of people who would otherwise most likely be located in one of Canberra's existing satellite city centres, had the airport been subject to sound town planning conditions. The degree to which the airport's private owners



have drained economic resources and employment away from Canberra's town centres such as Gungahlin should be quantified.

- We object to major retailing occurring at the airport that is not directly related to or ancillary to the airports aeronautical endeavours. This objection is based on the fact that such non-aeronautical facilities should be located within the established territorial planning regime, and location of major retailing facilities undermines the established territorial town centre hierarchy planning and system. It has undoubtedly had a direct and adverse impact on the sound economic and social development of the Gungahlin town centre.
- We object to offices locating public sector and private sector tenants at the airport. This objection is based on the fact that such offices should be located within the established territorial planning regime, and location of office facilities at the airport undermines the established territorial town centre hierarchy system.
- GCC also objects to other non-aeronautical businesses at the airport in Brindabella Business Park, the North West Precinct and Fairbairn, unless it can be clearly shown that such businesses are supporting or ancillary to the aeronautical infrastructure and services.

### **Chapter 3 – Consultation**

- Airport management has made far more effort to engage with community with this draft than occurred for the 2008 draft. GCC reps have attended four different meetings held or attended by airport delegates. The airport has been forthcoming on all questions and have freely acknowledged erroneous and unclear information within the draft plan and undertaken to correct this prior to submission. They have corrected incorrect assertions without malice and have remained civil even in heated situations.
- Notwithstanding this, our request for a copy of the 2008 draft as submitted was refused by the airport, forcing us to obtain a copy via FoI. The delay this caused limited our ability to consider the previous drafting in a timely manner. We would hope that our future request for the redrafted 2009 draft will not go the same way, as such incidents undermine the airport's claims on consultation and community engagement.

### **Chapter 4 – Local planning**

- It is farcical to contend that the airport is integrated with local planning, when its expansion into office accommodation is clearly contrary to all ACT planning. Much is made in section 4.1 of the airport being noted in the National Capital Plan as a Defined Office Employment Centre, whereas this may well be an acknowledgement of the current situation of offices already built, rather than an endorsement of the situation or of future expansion.
- Broadacre Areas surrounding the airport are discussed as if 'banked' for future development. However the Broadacre Zone land around the airport is in fact governed under the ACT Territory Plan rather than the National Capital Plan. The Territory Plan has the Broadacre zone objectives as:
  - a) Make provision in a predominantly rural landscape setting for a range of uses that require larger sites and/or a location outside urban areas
  - b) Make provision for activities requiring clearance zones or protection from conflicting development



- c) Ensure that development does not adversely impact or visually intrude on the landscape and environmental quality of the locality
- d) Ensure, where appropriate, that development and the use of land does not undermine the future use of land which may be required for urban and other purposes

Clearly these objectives put preservation of the landscape as a priority, with opportunities for future development quite limited, so it is not appropriate for the draft plan to be drawing such conclusions.

- Section 4.2 selectively quotes ACT planning documents to create an apparently positive picture of the airport's role in local planning. However one quote used points to the actual situation, calling on the airport to '...take account of relevant ACT planning laws and policies in order to moderate significant impacts on metropolitan planning...' yet the section goes on to discuss the Territory Plan having no jurisdiction over the airport, indicating that airport management have no intention of complying with the above call from the ACT Government.

### **Chapter 5 – Airline growth**

- Section 5.4 submits that Sydney's proposed second airport should be in Canberra, with high-speed rail linking it back to Sydney. GCC contends that Canberra is too far from Sydney – even with a fast rail link – to serve that function. Further we contend that such a development would constitute a major off-loading of Sydney noise onto the Canberra community, which would be unwarranted and unrewarded.

### **Chapter 6 – Freight operations**

- The draft plan contradicts itself with regard to noise impacts from overnight freight operations. It starts by discussing the need to articulate the noise impact of overnight aircraft operations in order to minimise residential development near the main flight corridors. But then it argues that their management of the operations have resulted in no noise complaints. The draft plan draws on lack of complaints during a one-off visit of the US president as rationale for allowing ongoing night freight operations – clearly there is no comparison or relevance in such a comparison.
- During consultation workshops, the airport has been unable to explain the discrepancies between data in Table 6.2 and table 6.3. 6.3 discusses 'aircraft operations' but 'truck movements'. With planes both coming and going, it is appropriate to discuss 'aircraft movements'. Likewise the table should show a breakdown in arrival and departure times. Airport management have conceded the majority of these would be between 11.30 pm and 2.00 am, thus ensuring maximum disruption for sleeping residents.
- GCC objects to the concept of 24-hour freight operations at Canberra airport on the basis that the introduction of an 11 pm to 6 am curfew for the airport would be an appropriate mechanism to balance the economic return of the airport with the community need for a measure of respite. Establishing a curfew early would ensure that all subsequent investment in the airport and supporting industry would be made on an informed basis, with expectations more in accordance with development potential that is acceptable to the community. The airport is presented in the draft plan as 'the only 24-hour 747 and A380 capable airport between Sydney and Melbourne'. We ask why should Canberra residents be expected to put up with late night traffic that is deemed unacceptable everywhere else?



## **Chapter 8 – Terminal**

- GCC supports plans to expand the airport terminal, including restoration of the ability for passengers and family to do brief set downs and pick ups without being forced into expensive pay parking.

## **Chapter 10 – Development options**

- Careful wording in section 10.2 gives the impression that retail expansion in the airport grounds is supported by the National Capital Plan. In fact the NCP states in section 5.2(h) that retail ‘provided that individual retail establishments outside the Terminal Building (other than “Retail” associated with a Primary Use) shall not generally exceed 500 square metres in Gross Floor Area.’ Clearly neither existing or proposed retail development in airport lands complied with this intent. Further expansion of ‘other’ retail with airport grounds is not supported by GCC.
- It is clear from the draft plan that the airport has grand designs on the Fairbairn precinct. As previously stated, any non-airport related development that occurs around the airport directly detracts from the economic success of the existing planned town centres of Canberra, including Gungahlin, which has suffered extensively due to commercial expansion at the airport. Fairbairn needs very strict limitations on usage. There is also the question of ownership transferring to the airport management as a given. If Defence is to sell land at Fairbairn, it should be by open auction.
- Section 10.5 discusses signage policy being optimised for value, income and quality. As is to be expected with a proponent-led plan, no mention is made of impact on passing traveller, neighbours, etc of inordinately and ill-placed billboards.

## **Chapter 11 – Road access**

- This chapter should cover road and public transport, and should specifically discuss integration of a light rail or similar network into the airport.

## **Chapter 12 - Engineering**

- The quality of engineering within the airport has generally been high. However discussion on wastewater treatment during one session indicated that reverse osmosis is planned. This method is a large energy consumer, and therefore high in greenhouse emissions. Depending on proposed use, RO may be overkill and a less intensive treatment process may be adequate.

## **Chapter 14 – Aircraft noise**

- GCC does not support residential development under or in close proximity to major flightpaths. Noise-proofing of residences is a poor solution – Canberra receives hot summers, and noise proofing is only useful if the home remains completely closed. This would lock in expensive and greenhouse-intensive airconditioning to maintain residential amenity.
- However, we also object to the airport’s previous methods used in an attempt to sterilise a High Noise Corridor for the airport. It is a fact that major airports in other jurisdictions, where possible, buy the land themselves under their approach and departure flight paths in order to create and secure high noise corridors. The airport should be following this approach to securing High Noise Corridors if it indeed believes that such development threatens its business viability.



- The Hackett noise monitor was installed after urging from GCC, in order to put an end to aspersions regularly cast on noise complainants by airport and Air Services Australia staff at the Noise Consultative Forum meetings. We note via Webtrak that the monitor is already producing results that back up complaints made by Hackett residents, contrary to assertions by the airport and ASA. It also provides useful noise information via Webtrak for Gungahlin residents. We call on the government to maintain the Hackett noise monitor permanently, as is the case with the Jerrabomberra monitor.
- Section 14.4 proposes extension of the northern Noise Abatement Area to take in the entire proposed development areas of North Canberra and Gungahlin. GCC has been lobbying for this as long as I have been attending the Noise Consultative Forum meetings. However this has always been opposed by both ASA and airport staff. While the turnaround on this by the airport is welcome, ASA staff are on record as recently as December 2008 as continuing to oppose such a change. Although they acknowledge it wouldn't significantly affect jet flight operations, they refuse to countenance such a change unless it were to come as a political directive.
- While GCC welcomes the changed position from the airport, we remain concerned that this is based only on contractual arrangements between the airport and aircraft operators, and the airport could easily be sold off, thereby negating such arrangements. Legislative change is needed to cement changes to the Noise Abatement Area restrictions.
- Likewise the proposal to prohibit overflight of the NAA between 11 pm and 6 am is supported, but requires legislative certainty.
- Further, at the airport's presentation to GCC, they discussed negotiations with aircraft operators to have flights currently turning left over Gungahlin (bound for Adelaide and Melbourne) to instead turn right around Queanbeyan. We support this concept if it does not worsen noise for Queanbeyan residents, but note that the idea has not been mentioned at any other public meeting nor within the draft plan itself.

## **Chapter 15 – Environmental management**

- Bird management is not mentioned within the draft plan.
- There should be quantification of the airport's greenhouse impact resulting from the inappropriate location of non-airport related office accommodation, resulting in unavoidable commuting and traffic congestion.