

Date: 1 December, 2015

Department of Infrastructure and Regional Development
Western Sydney Airport Submission
Western Sydney Unit
GPO Box 594
Canberra ACT 2601

Submission on Western Sydney Airport Draft EIS and Draft Airport Plan

I make the following submission in relation to the abovementioned Draft EIS and Airport Plan on behalf of No Aircraft Noise Party.

Whilst, we support Western Sydney population growth plans including supporting infrastructure, we would like to remind the Department of Infrastructure and Regional Development that the need for a second airport is driven by capacity constraints at Sydney Airport and not a jobs agenda for Western Sydney.

In the Executive Summary of the EIS there are two objectives:

1. “the Western Sydney Airport (proposed airport) would cater for ongoing growth in demand for air travel, particularly in the rapidly expanding Western Sydney region, “and
2. “providing additional aviation capacity in the Sydney region more broadly. “

In this submission, we will outline why the airport as scoped is not viable in the early years and that the scope of the EIS is too narrow as it excludes describing the impact across greater Sydney.

The objective of “providing additional aviation capacity in the Sydney region” requires analysis across the Sydney region which is either missing or at a conceptual level in the EIS making it impossible to evaluate the true impact to greater Sydney. Sydney residents are also stakeholders of the new airport and they need to understand changes to aviation services that will impact them.

Key issues are:

1. We believe that the government has a role to ensure that impact of aviation operations is fairly shared across the Sydney region with the following suggestions:
 - a. Implement a noise sharing plan and monitoring to equitably share aviation noise across the Sydney region.
 - b. Keep Sydney Airport operations within the Long Term Operating Plan / new noise sharing plan by requiring flights to be moved to the new airport once noise levels and flight path usage limits are reached.
 - c. Remove all curfew flights from the Sydney Airport Curfew to Western Sydney Airport.
 - d. Remove the Sydney Airport shoulder period flights to use Western Sydney airport which is a 24 hour airport. This will enable Western Sydney to take these international and domestic flights from day 1 of operations, making it viable from day 1. It would return Sydney Airport to a true curfew.
2. We strongly object to exclusion of forecasts of Sydney wide passenger numbers, air traffic movements and mix between international, domestic, regional and freight at **all existing and proposed Rapid Passenger Transport (RPT) airports within the region**. Residents need to

understand flight movement and type of plane volumes at each airport to understand their impact and the proposed equity of sharing impacts of aviation operations across the region. Ref. Vol 1 – Operational Capacity and Vol. 2 15:5.2 Passenger Trip Generation.

3. We object to the changes on Sydney Airport and Bankstown flight paths and resulting aircraft noise impacts on Sydney residents being not known because the Airspace Design is at only conceptual level. Ref. Vol 1 Executive Summary – Airspace Architecture.
4. We object and do not believe that Western Sydney Airport will be a viable airport if it is scoped to provide aviation services primarily servicing the Western Sydney suburbs. Today, only 11% of passengers either start or end their journeys from the western suburbs. The majority of Sydney’s passengers come from Sydney CBD, northern and eastern suburbs (2006 Sydney Airport Ground Transport Plan, also graph in Attachment 1). Demographic change of the magnitude relied upon in the EIS for western suburb passenger growth to drive the use of the Western Sydney Airport will take decades to be achieved. Additionally, the EIS transport plan is not adequate as:
 - a. The majority of passengers will be from the greater Sydney region but they won’t be able to access the new airport because there is no quick, convenient and cost effective rail link to the Sydney CBD, Sydney Airport, interchange capability to greater Sydney and western suburbs hubs. Quick and convenient access is especially important for peak hour flights.
 - b. A ground transport plan based on the Sydney Airport Transport Plan (Vol 2. 15.5.2.3) is an invalid assumption because assuming the same mix of “Kiss and Fly”, “Park and Fly” and Taxis passenger access to an airport 50 km from the CBD to an airport 8 km from the city is just not valid.
 - c. Why would passengers choose an airport that is difficult to access with limited destinations? It appears that the aviation services being supplied are low cost flights similar to the Avalon Airport business model. This is NOT relieving capacity pressure at Sydney Airport as suggested in the airport’s objectives and the conclusions of the Joint Study into Sydney region aviation requirements.
5. We strongly object to the market driven approach allowing airlines to “opt in” to using Western Sydney Airport because airlines will not choose to move or duplicate their infrastructure unless there is a tangible financial benefit or they do not have available slots or terminal space at Sydney Airport. Airlines will defer cost wherever possible. Hence, offered flight destinations at the new airport will be limited. **We believe that the government has a role in ensuring that the new airport is used and viable and there is equity in sharing the impact of aviation operations across the Sydney region.**
6. We object to the strategy to moving domestic flights to Western Sydney first as this will lead to Sydney Airport replacing domestic / regional flight slots with noisier international flights worsening aircraft noise in Sydney.
7. We object and are concerned that the EIS does not mention that areas around Western Sydney Airport or under its flight paths will have insulation if the aircraft noise exceeds the Australian Standard as defined in AS2021. This standard outlines the day and night time noise acceptable for a reasonable life.

8. In the site selection process, the government should have been planning an airport capable of taking all of Sydney's air traffic with an acceptable noise impact. This airport as described in the EIS does not meet this criteria.

Yours sincerely,

No Aircraft Noise

Attachment 1:

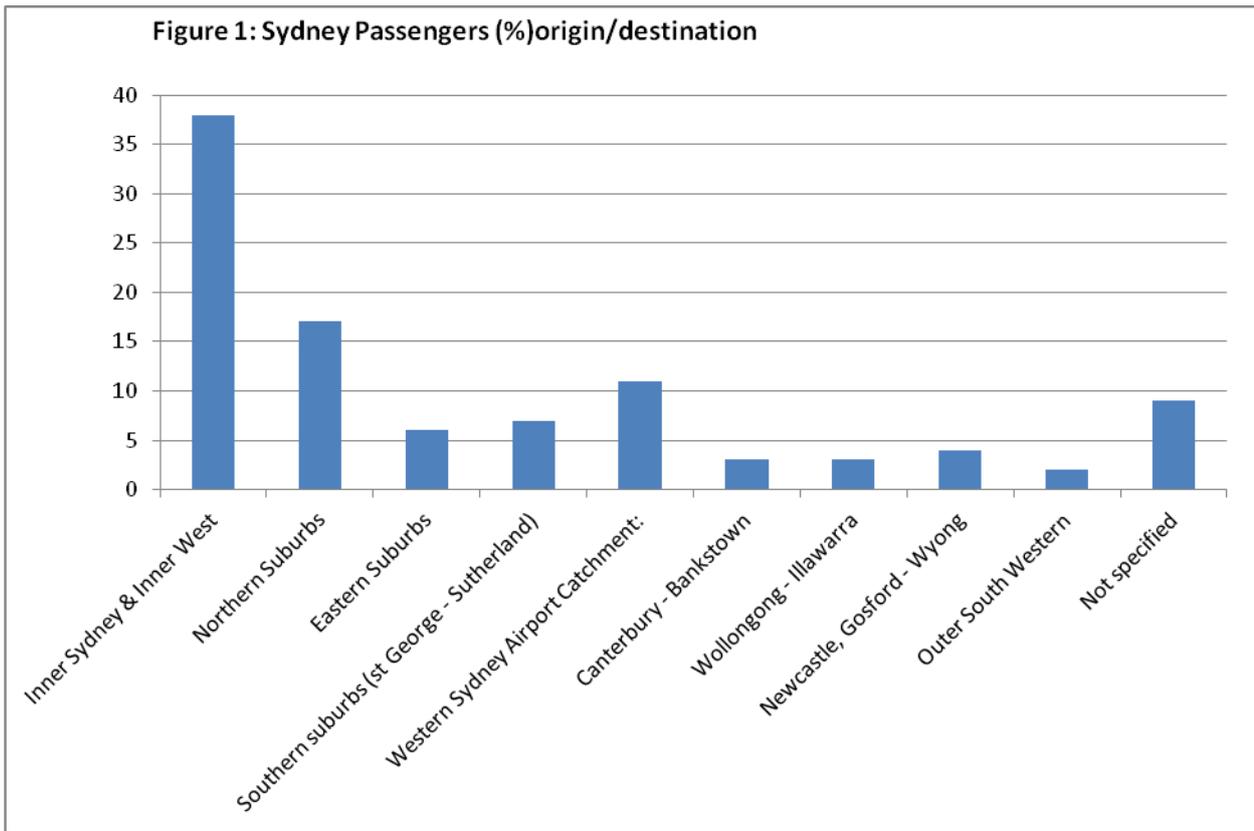


Figure 1: Data Source is the 2006 Sydney Airport Ground Transport Plan

NB: Western Suburbs Catchment includes: Western Suburbs, Central West, Outer West, Blacktown, Baulkham Hills and Fairfield-Liverpool.

Northern Suburbs includes Northern Beaches, Hornsby & Lower Northern Suburbs