

23 January 2024

Submission In Response to the Draft Environmental Impact Statement for Western Sydney International (Nancy-Bird Walton) Airport preliminary flight paths

By Email: eis.submissions@infrastructure.gov.au

Dear Sir/Ms,

In response to the publishing of the Draft WSIA EIS in Oct 2023 WSROC commissioned peer reviews of the acoustic and health components of the EIS. The reports are at Attachments 1 and 2 of this brief.

1. Western Sydney International Airport EIS – Acoustic Peer Review

This peer review has identified several limitations concerning the content of the draft EIS, and therefore further information and assessments have been recommended. These can be found at page 4 of the report.

In addition to those limitations captured in the Acoustic Peer Review Report, the Draft EIS has a number of other deficiencies that includes;

1. Section 2.3.3 talks to Facilitated impacts, impacts associated with the limited changes to the existing Sydney Kingsford Smith Airport (KSA) flight paths but no detailed analysis is provided. This must form part of the next revision of the draft EIS as it will impact those Local Government Areas, that the current analysis indicates may only be marginally/to not substantially affected by the proposed flight paths.

We especially not that these will “include changes to some of the existing departures and arrivals at Sydney (Kingsford Smith) Airport, as well as changes to Instrument Flight Rules (IFR) and Visual Flight Rules (VFR) operations at Bankstown and Camden Airports, RAAF Base Richmond, and changes to lower-level transit flights in the Sydney Basin”

2. Section 2.4.4 includes discussion around variations in aircraft noise levels being primarily wind direction and speed, hence runway used.

The EIS uses seasonal weather data (averages) as a baseline to assess noise impacts. The meteorological conditions are an important consideration to determine runway usage, aircraft performance and noise propagation. The use of average temperatures i.e. from

Apr to Sep 20 degrees C, from Oct to March 27.8 degrees C is misguided. Using averages in this case is entirely inappropriate, In 2023 there have been 119 over 27.9 degree days, 82 over 30 degree days and 23 over 35 degree days at Badgerys Creek. These are not air above tarmac temperatures that are significantly higher.

Atmospheric parameters can affect noise levels through varying aircraft position (altitude and thrust influenced by air density) and varying the rate of absorption as sound propagates through the atmosphere. Under certain atmospheric conditions including extreme temperatures aircraft will require more power (thrust) and hence increase noise levels, or at same thrust, take off at decreased gradients making flights closer to the ground for longer distances, resulting in increased noise levels at ground level. This aspect requires far more consideration.

3. The exclusion of the flight path design for the final stage of the airport's development (2nd runway operations) presents a critical deficiency in assessing impacts to current and future communities. Potential impacts, post 2055, with the opening of the second runway must be included in the EIS.
4. The Draft EIS proposes the establishment of community aviation consultation group (CACG) and the preparation of a Community and Stakeholder Engagement Plan by end 2024. It does not provide any detail as to the role and functions of such an entity. It is noted that WSIA will be a work in progress that will span over three decades of development and operating activities. Ongoing consultation with local government and local communities will be critical. To this end a CACG must:
 - Ensure that all reasonable measures are taken by Governments to minimise the effects of aircraft and airport operations on local communities. .
 - Achieve recognition of the CACG, by Governments, as a consultative group representing the interests of communities affected by aircraft and airport operations.
 - Establish effective mechanisms by which the CACG and the relevant member Councils are consulted by Governments during the early stages of planning for changes in airport operations, flight operations and with regard to major airport development proposals.
 - Establish ongoing liaison with airline operators and other organisations having vested interest in airport operations, with a view of achieving the recognition and understanding of matters of concern to communities affected by aircraft noise and airport operations and to establish a collaborative approach to seeking the resolution of those concerns.
 - Press for the application of meaningful noise metrics in the development of appropriate land use plans for land surrounding airports and for an independent and transparent process for the verification of the noise footprint identified as a result of the application of those metrics.

2. Western Sydney International Airport – Review of the Health Component of the Airspace and Flight Path Design Draft EIS

WSROC commissioned a Health Assessment in support of the peer review of the Draft Flight Path EIS. The Health Assessment provides advice as to how the EIS can be improved to protect health and includes the adoption of the following principles/actions;

1. Take sleep seriously.
2. Remedy the mismatch between protections afforded by ANEC and health effects.
3. Flight respite needs to be rethought and presented differently.
4. Length of night is arbitrary and irregular.
5. Precautionary principle.

These are explained in detail at pages 9 and 10 of the report.

Yours sincerely,

A handwritten signature in blue ink that reads "Charles Casuscelli".

Charles Casuscelli RFD
CEO

Attachments.

- 1. Western Sydney International Airport EIS – Acoustic Peer Review**
- 2. Western Sydney International Airport – Review of the Health Component of the Airspace and Flight Path Design Draft EIS**