



Residents Against Western Sydney Airport Incorporated
Blaxland NSW
Email: rawsaconnect@bigpond.com

Update No. 38 – 14th January 2024 – What’s the latest!

If we want to change the inevitable adverse outcomes of the proposed Flight Paths and the operation of the Airport itself, community concerns must be made known now!

Now that the Christmas and New Year celebration period is over, RAWSA believes it is an appropriate time to focus on submissions and other measures to counter the proposals in the 2023 draft Environmental Impact Statement (EIS), released late last year. The EIS is seeking submissions from the public and this Newsletter is focussed on how you can participate.

If like RAWSA, you have great concern about the detrimental effects that WSA and its flight paths will have on our lives and environment, you have two clear choices. Either you can:

1. **Listen to the message in this Newsletter** and take some time to make submissions for changes to the future that Governments have decided for us; Or you can do nothing now and;
2. **Listen to aircraft noise forever!** At all hours of the day and night, without respite!

What can you do about WSA Flight Paths?

If you agree with RAWSA that the implementation of these WSA Flight Paths will result in unjustifiable impacts on people and the natural environment, individuals can take actions to bring attention to government departments and politicians, their primary responsibility is to the people, not to the aviation industry:

- Make submissions on WSA Flight Paths **no later than 31st January 2024** expressing opinions based on either:
 - a. Your own evaluations of the Flight Paths EIS content; or
 - b. Submission Guides (later in this Newsletter).

The main point is that you do not need to be an academic – just put together a few sentences outlining your concerns and viewpoints.

The real value is not so much what you put in your submission – it is the fact that you do it.

Politicians will do nothing to fix the problems they have created UNLESS they feel threatened by the wave of public opposition.

Ways to submit your opinion on WSA Flight Paths

Submit your views and concerns on the WSA Flight Paths in one of the following ways:

Online - make a simple submission to Dept. of Infrastructure on the issues you are concerned about, via the submission form at: <https://www.wsiflightpaths.gov.au/make-a-submission>

Via email to eis.submissions@infrastructure.gov.au

Posted to: WSI flight path team - Department of Infrastructure
GPO Box 594, Canberra, ACT 2601 Australia

Additional ways to Influence Politicians

Apart from putting in submissions on the WSA Flight Path EIS, RAWSA requests you also email a copy of your submissions to local Members of Parliament. This will add weight to your submissions and will ensure the Department of Infrastructure and Airservices Australia fully disclose the true extent of community opposition to the 2023 WSA Flight Path EIS (Environmental Impact Statement).

Following is a list of the M.P.s whose electorate will be directly affected by the adverse impacts of the proposed flight paths. Emailing any one or all (in a group addressed email) will pressure them into awareness of community concerns.

With a federal election due next year, MPs will want to avoid voter backlash and will therefore be motivated to take community concerns to the Prime Minister, the Transport Minister and Cabinet.

Member of Parliament Email Contact List

Federal Electorate	MP Surname	Email contact
Chifley	Husic	Ed.Husic.MP@aph.gov.au
Fowler	Le	Dai.Le.MP@aph.gov.au
Greenway	Rowland	Michelle.Rowland.MP@aph.gov.au
Hume	Taylor	Angus.Taylor.MP@aph.gov.au
Lindsay	McIntosh	Melissa.McIntosh.MP@aph.gov.au
Macarthur	Frelander	Mike.Frelander.MP@aph.gov.au
Macquarie	Templeman	Susan.Templeman.MP@aph.gov.au
McMahon	Bowen	Chris.Bowen.MP@aph.gov.au
Mitchell	Hawke	Alex.Hawke.MP@aph.gov.au
Werriwa	Stanley	Anne.Stanley.MP@aph.gov.au

Note – only Susan Templeman (Blue Mountains MP) and Ed Husic (Chifley MP) have mounted opposition to WSA impacts, but send a copy of submissions to them also as it will help them convince their colleagues to take action.

Requested Advice on Submissions

In response to requests from residents for submission advice, RAWSA has formulated some Guidelines that people can use for submissions.

General Guidance for Submissions

Some people prefer to formulate their submissions using their own words so following are a number of topics you can express your concerns about:

- Wanting changes to the proposed flight paths to:
 - lower impacts on your particular area,
 - eliminate environmental impacts on World Heritage Blue Mountains National Parks,
 - share flight paths more equitably over the whole Sydney Basin, as done with Sydney Airport,
- Wanting an 11pm to 6am curfew just like Sydney Airport,
- Wanting hourly flight limits just like Sydney Airport,
- Environmental impacts on natural landscapes and wildlife habitats,
- Toxic jet exhaust adding to local pollution and global climate extremes
- The noise, health and lifestyle impacts of:
 - Flight Paths extending significantly into and threatening World Heritage Area and affecting main Water Supply at Warragamba,
 - A/C noise disturbance on sleep, stress and children at school & home

Specific Guidance for Submissions

Some people want to make submissions but the pressures of daily life make it difficult to do so. Therefore RAWSA has formulated some Submission Guides on a number of topics that people can copy/paste into their responses or use as a framework for incorporating their own words

Submission Guide 1. – A curfew on Flight Paths

Submission Guideline 1 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

These flight paths will result in 24 hour aircraft noise and pollution over a wider area than indicated by the Government over the last ten years. As shown by the Aircraft Overflight Noise Tool in this EIS, the noise impacts of these flight paths will affect many thousands of people currently living in Southwestern, Western, and Northwestern Metropolitan Sydney, as well as the Blue Mountains and Wollondilly regions.

They will also impact residents who establish future homes in the flight path affected areas. This situation is much worse than what was predicted in the 2016 Airport EIS and the glossy brochures produced since 2014.

I oppose these 2023 Flight Paths and am insulted that successive Governments expect me to go silent and just accept the impacts that I will have thrust upon me. Government ignored community concerns about the airport and went ahead with the project anyway. Ten years too late, Government now produces flight paths that will impact over a majority of *The West* and in particular will affect my family's health, well-being, lifestyle and environment.

Government created this foreseeable dilemma – it's up to Government to (at least partially) fix this situation by putting an overnight operating curfew on the Flight Paths of Western Sydney Airport.

Submission Guide 2. - The Blatant Discrimination

Submission Guide 2 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

I oppose these flight paths on the basis of the discrimination, unfairness and inequity they inflict on the residents of Western, Southwestern and Northwestern Metropolitan Sydney, as well as the Blue Mountains and Wollondilly regions (termed *The West*).

These flight paths impose 24 hour aircraft noise and pollution on '*The West*' and do not provide the same protections given to people in '*The East*' affected by flight paths for Sydney Airport. Unlike Sydney Airport Flight Paths, the proposed WSA Flight Paths:

- Do not utilise the entire Sydney basin to share and disperse aircraft impacts;
- Will have aircraft using Flight Paths all day and all night 24/7/365;
- Will not have any regulation about the frequency or timing of overflights;
- Do not recognise there is no ocean over which air routes can be used to mitigate adverse impacts;
- Do not have exposure to ongoing public scrutiny and influence through an open forum like the Sydney Airport Community Forum. Instead we are inflicted with FOWSA which operates in secret and refuses to allow public observers at its meetings.

There is no justification for the unstated but obvious Government discrimination in this 2023 WSI Flight Paths EIS. This assumption in the EIS reinforces my view that successive Governments have ignored their duty of care responsibilities to local people and simply expect me to go silent and just accept the impacts that I will have thrust upon me.

I demand the same community protections in the Flight Paths for Western Sydney Airport, as those adopted to protect residents affected by Flight Paths for Sydney Airport. Change the WSA Flight Paths!

Submission Guide 3. - Resident impacts were foreseeable

Submission Guide 3 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

The 2016 WSA EIS identified a series of constraints that would affect the way airspace could be designed and repeated these in the 2023 Flight Paths EIS. In the previous EIS, the need to overfly residences because of these constraints was simply ignored, because the overall objective of building an airport, was the priority of Govt. Now, these constraints are coming into play.

Any claim by our Federal Govt. and its Dept. of Infrastructure that these flight paths are the best outcome for residents of *The West*, is ludicrous, misleading and insulting.

The identified constrains include:

- Altitude and existence of the nearby Great Dividing Range
- The World Heritage listed Blue Mountains National Parks,
- Sydney's main water supply consisting of Warragamba Dam and Lake Burragorang
- The ANSTO Nuclear Facility at Lucas Heights

- Existing Bankstown and Camden Airports,
- The Orchard Hills Defence Establishment,
- The RAAF Military Base at Richmond,
- The Holsworthy Military Firing Range
- The airspace architecture for Sydney Airport (treated by Government as sacrosanct)
- Airspace for gliders, parachuting and ballooning.
- Airspace for transitioning flights.

These constraints alone, provided insight to Government on the foreseeable impacts that WSA Flight Paths would have on *The West* – but the Government went ahead with building the airport despite these predictable and obvious impediments. So now with the flight paths released, community overflights will occur, and will occur under the guise of being 'unavoidable'.

People's homes should be treated as additional constraints that must not be flown over, regardless of any cost impacts on the aviation industry. I demand changes to the EIS Preliminary Flight Paths

Submission Guide 4 – Change the Preliminary Flight Paths

Submission Guide 4 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

These flight paths impose 24 hour aircraft noise and pollution on '*The West*' and do not provide the same protections given to people in '*The East*' affected by flight paths for Sydney Airport. Unlike Sydney Airport Flight Paths, which utilises more than 2/3rd of the Greater Sydney area to disperse aircraft noise and pollution impacts, the proposed WSA Flight Paths:

- Are crammed into less than 1/3rd of the Greater Sydney area that has multiple constraints to limit the dispersal of aircraft noise and pollution impacts;
- Will have aircraft using Flight Paths all day and all night 24/7/365;
- Will not have any flight caps which regulate limits on the frequency of overflights;
- That unlike KSA, there is no ocean over which air routes can be used to mitigate adverse impacts;
- That unwisely impose detrimental noise and pollution impacts from low flying aircraft on the pristine, natural environments, which were responsible for World Heritage listing of Blue Mountains National Parks.

These factors result in unfair and unjustifiable Preliminary Flight Paths proposed in the 2023 EIS.

I demand that the Preliminary Flight Paths for WSA be changed by an immediate overhaul of airspace architecture for the entire Sydney basin. Regardless of any additional costs to airlines, this overhaul must ensure that:

- KSA flight paths:
 - a. Are moved further to the East to result in more flyover operations of Botany Bay, the Kurnell sand hills and the Pacific Ocean
 - b. Lower current noise and pollution impacts on residents of the entire Greater Sydney basin,
 - c. Allow more flexibility in the design of WSA flight paths to truly minimise aircraft noise and pollution impacts on residents of Sydney's West, Southwest and Northwest as well as the Blue Mountains and Wollondilly regions.
- Do not permit the incursion of low flying aircraft within the World Heritage listed areas.

I demand the same community protections in the Flight Paths for Western Sydney Airport, as those adopted to protect residents affected by Flight Paths for Sydney Airport, by redesigning airspace over the entire Sydney basin.

Submission Guide 5. – Reciprocal Runway Operations

Submission Guide 5 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

Instead of implementing a curfew at WSA overnight, the 2023 Flight Path EIS plans to use Reciprocal Runway Operations (RRO) where departing aircraft take off in the same direction that inbound aircraft arrive from.

The Dept. of Infrastructure claim this to be the best way of minimising the number of residents affected by overnight aircraft noise. By comparing the EIS flight path locations with the 2021 Census, it is calculated that a minimum of 12,203 residents will be immediately overflowed by this RRO plan for WSA. This figure does not reflect the additional population that will be affected by aircraft being permitted to fly outside of the nominal flight path, nor does it include the affected population overflowed in future, due to the substantial urban development growth planned in affected areas.

RRO measures have been used at KSA for many years for flying freight aircraft during that airport's curfew hours. In the case of KSA, departing aircraft overfly Botany Bay, the Kurnell sand hills and thereafter, the Pacific Ocean – no residential areas are overflowed for departures. Due to the need of a straight line approach for aircraft arriving at KSA, it is necessary to overfly the residential area of Kurnell which affects a population of 2528 people (2021 Census). This area has virtually no future growth potential.

The proposed RRO for WSA cannot utilise over-ocean operations and there will be substantially more residents (minimum of 12,203) affected by overflights from WSA than for the 2528 residents of Kurnell affected only by inbound RRO flights at KSA.

Governments claim that Sydney needs to have 24 hour access to aviation services (supposedly demanded by financial imperatives). Then, applying Principles to minimise the population affected by aircraft overflights, dictates that a curfew be instituted at WSA and the current curfew at KSA be modified to allow extra RRO flights at KSA.

This does not in any way mean that populations in *The East* are not entitled to relief from the invasive aviation industry. I am simply highlighting that KSA's location near the ocean, makes current night time RRO protections at KSA very different to the larger effect of proposed RRO measures at WSA and are therefore not a valid justification for operating flight paths at WSA on an all-day/all-night 24/7/365 basis – without ANY relief!

Submission Guide 6. – Deficient Noise Assessment Criteria

Submission Guide 6 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

The 2023 Flight Path EIS continues the dubious and long challenged use of noise assessment criteria based upon the practice of presenting maximum noise impacts in the form of decibels that are averaged over time.

This practice is challenged by communities and Acoustic Experts repeatedly in Submissions to Government Agencies and yet it continues to be used. For decades, this practice has systematically under-estimated projected noise impacts from aircraft and results in local resident outrage when subsequently, they are exposed to far worse noise than the EIS/Airport Plan modelling estimated.

Examples of these discrepancies manifest themselves in community protest that has occurred with the Sydney Airport 3rd Runway and more recently in relation to aviation changes at Gold Coast, Sunshine Coast, Brisbane, Perth and Hobart Airports. It is likely that the same manifestations will be experienced with the Western Sydney Airport flight paths.

People do not have the capacity to hear averaged aircraft noise! Therefore the averaging of LA_{max} noise levels in EIS methodologies to indicate the impact of single event flyovers, is an improper assessment criteria that leads to inaccurate conclusions, upon which critical decisions are based.

This assertion is supported by WHO (World Health Orgn) '*equal energy principle on noise*' that states -
"the total effect of sound is proportional to the total amount of sound energy received by the ear, irrespective of the distribution of that energy in time."

While 'number above' measures included in the EIS improves information about aircraft noise impacts, the EIS only includes a) contours where the number of flights above 70 decibels (N70) will be experienced and b) contours where the number of flights above 60 decibels (N60) will be experienced.

It is imperative that flight path EIS documents also include contours showing the number of flights above 50 decibels (N50) and the number of flights above 40 decibels (N40). To continue excluding N50 and N40 decibels is a misleading and deceptive practice.

Submission Guideline 7. – Bogus Flight Path Efficiency Claims

Submission Guide 7 wording follows

As an affected resident I write to express my concerns about the WSI Preliminary Flight Paths issued in the draft 2023 EIS.

The 2023 Flight Path EIS claims that *aviation efficiency* is one of the key factors in designing flight paths for WSA. The decision to quarantine KSA flight paths from major change is totally at odds with creating the objective of *aviation efficiency*.

The release of the 2023 WSA Flight Path EIS reinforces community views that the primary reason for the decision to operate flight paths on a 24/7 basis in western Sydney, was to neutralise the increasing business pressure to remove the *inefficient* night-time curfew at KSA.

The current Sydney curfew means that KSA only operates at 2/3rds of its potential efficiency, in order to protect constituents in the electorates of current Prime Minister Albanese and the previous four Prime Ministers (Howard, Abbott, Turnbull and Morrison).

Affected communities view the decision to dump 24 hour flight path operations on *The West*, as being motivated by political expediency and self-interest, by favouring voters in their own electorates from night aircraft overflight impacts.

This is demonstrated by influencers from *The East* who have been strong advocates of 24/7/365 operation of WSA flight paths, including:

- MP for Warringah, Tony Abbott – then PM who announced the resurrected WSA project
- MP for Bradfield, Paul Fletcher – then Minister who approved the WSA project
- MP for North Sydney, Joe Hockey – ex influential Minister in Howard & Abbott govts
- MP for Wentworth, Malcolm Turnbull – ex PM who gave stewardship to WSA project
- MP for Sydney, Tanya Plibersek – ex Opp'n Dep. & current Minister who supports WSA
- MP Anthony Albanese – current PM, who is the loudest supporter of WSA project, and
- MP Scott Morrison – ex PM who oversaw the commencement of the WSA project and who continues to complain about noise from the few freight flights permitted during KSA curfew hours.

Publicly stated comments from the current Minister for Transport, Catherine King, validate these community concerns and exposes the reason for a second Sydney airport is to preserve current protections of a curfew and flight caps for east Sydney electorates by operating unrestricted 24/7 flight paths in western Sydney:

ABC Online News - Posted 28 Jun 2023

"The reason we are even talking about having a second airport in Sydney is because of the constraints that are currently there on the curfew airport — at Kingsford Smith Airport".

Minister King has an opportunity to rectify this cynical inequity by providing the same protections of a curfew and flight caps for people of *The West*.

Summary of Actions

The RAWSA management committee:

- Is formulating and will submit a detailed response to the WSA Flight Path EIS on behalf of the wider community.
- Is keeping our communities up to date with emerging EIS matters.
- Within this Newsletter and on social media, has provided submission guides as promised.
- Asks that now, you make as many submissions as possible, **before January 31st**.
- Asks you to consider supporting the new petition available at: <https://chng.it/GvLGDRngvT>

Our individual and collective submissions can change the Government's Policy decisions

Nothing changes a politician's mind quicker, than when their own future could be threatened by a wave of public opposition and criticism!

Regards and stay safe, Trevor Neal

For and on behalf of the RAWSA management committee