19 September 2014

Committee Secretary
Parliamentary Standing Committee on Public Works
PO Box 6021
Parliament House
CANBERRA ACT 2600

Dear Committee Secretary,

RE: AIR 6000 Phase 2A/B New Air Combat Capability Facilities Project

I have reviewed the report tabled at the Parliamentary Standing Committee on Public Works AIR 6000 Phase 2A/B New Air Combat Capability Facilities Project Public Hearing held at Port Stephens Council, Raymond Terrace on 10 September 2014.

I note in the “summary of key issues table” of ANNEX E of the Minute to the Committee on Public Consultation that it concludes:

Impact on Newcastle Airport operations – “The project team was able to provide assurance that impacts will be minimal in nature and that management processes used for other Defence major runway works have been successful in managing any impact.”

This does not clearly enunciate the issues raised by NAPL management at the briefing attended on 13 August 2014, these being:

> The lengthening of the runway to the south east will result in no direct taxiway access to the runway from the Newcastle Airport aircraft parking apron. This will result in significant operational inefficiencies with all civilian aircraft required to taxi across the runway to the military taxiways for all departures. As an increase in activity is promulgated the efficiency of the runway should be increased rather than decreased.

Verbal feedback to our concerns that aircraft can take off from the current threshold location of Runway 3-0 are unacceptable from an airline operators perspective.

> NAPL also raised the concern as to the change to or relevance of the “gunsafe line” due to the extension of the runway. We have been verbally advised that this artificial planning and safety constraint is redundant but remains subject to formal confirmation.

> NAPL understands that incorporated into the Facilities Project is the replacement of, decommissioning and rehabilitation of the current Sewer Treatment Plant (STP) adjoining the NAPL lease area. We have recently been advised that the replacement and decommissioning stages will be complete by late 2014, however the rehabilitation of that site will be deferred until 2020. As it has been acknowledged that the STP is a major impediment to future Airport development (the redundant land is to be annexed to the NAPL lease area) delaying its removal until 2020 is impractical and unreasonable.
Also raised at that meeting were concerns raised regarding noise impacts on NAPL passengers by changes in the noise profile due to the introduction of the F35. Please find attached our response to the public exhibition of the EIS, outlining our detailed concerns.

We trust there will remain a mechanism to further address our concerns as the approval and planning process continues.

I remain available to discuss in further detail any elements of our submissions.

Yours faithfully,

Paul Hughes
Chief Executive Officer
Draft Environmental Impact Statement for Flying Operations of the F-35A Lightening II

Response – Newcastle Airport Pty Limited

1. Introduction
The release of the Draft Environmental Impact Statement for Flying Operations of the F-35A Lightening II provides a welcome opportunity to comment in the context of Newcastle Airport Pty Limited’s (NAPL) operation.

The Newcastle Airport site is leased from the Commonwealth of Australia by Port Stephens Council and Newcastle City Council. NAPL is the operator of the Newcastle Airport site, as agent and trustee for the Councils.

In 2013 Newcastle Airport facilitated the movement of 1,198,312 passengers operated by airlines including Jetstar Airways, Virgin Australia, QantasLink and Regional Express. Destinations served include Brisbane, Melbourne, Gold Coast, Sydney and Ballina.

As well as the passenger terminal, the Newcastle Airport site also includes other aviation and aerospace businesses including BAE Systems, Jetstar Engineering, CEA Technologies, Air BP and most National car rental companies. More than 600 staff are employed across all businesses on the site.

Newcastle Airport is currently undergoing a $14.5 million terminal expansion, substantially funded by the New South Wales Government, which will increase the terminal footprint by 2,600m, and is due for completion late 2015. The expansion is part of the Defence approved 2006 Newcastle Airport Master Plan. Following the terminal expansion, access to and from the aircraft by passengers will remain as is the current practice, which involves transiting the apron between the terminal building and aircraft. There will be no aerobridges.

2. Issues
The broad issue is the lack of detailed analysis of the impact of the F-35A on Newcastle Airport operations. Newcastle Airport is not identified as a Sensitive Receptor, unlike the adjacent Fighterworld Museum, yet the Airport will continue to grow beyond the 1.2 million passengers it currently serves, as well as meeters and greeters and in excess of 600 employees on the Airport site.

The report indicates that:

- 20% of F-35A activity will be at noise level higher than currently experienced
- The number of fighter jet movements will increase to 20,164
- There will be a 10% increase in movements during noise sensitive hours
- The runway extension will result in different noise patterns to those currently experienced.

3. NAPL response
NAPL has sought answers or clarification on the above issues from Coffey Environments but in the absence of a response submits the report should be amended to specifically detail the impacts on Newcastle Airport, as has been done for other public sites, or alternatively Newcastle Airport should be provided a detailed response in writing.

The report does not appear to include any detail on the potential for performance based navigation systems such as Required Navigation Performance (RNP) or Ground Based Augmentation System (GBAS) to alleviate noise impact by military or civil operations in the future. If this has not been considered, should it be?

Further, the report includes future civil aircraft movements as outlined in the Newcastle Airport 2006 Master Plan. These figures are out dated and new forecasts are available. Newcastle Airport will be reviewing its Master Plan in 2015 once the impacts of the F-35A are understood.
By way of correction the detail quoted in the report (Volume 10 Appendix F) regarding the number of civilian flight movements allowed under the Operating Agreement (OA) between RAAF and Newcastle Airport is incorrect. The OA allows for a cap of six arrivals per hour, which when extrapolated over a 1 year period is equal to 35,040 arrivals or 70,080 movements. The table indicates the total movements allowed being 32,524.

4. In summary
The conclusion at 9.6.4 of the report that “the Newcastle Airport Limited terminal has been considered as an on-base area and is incorporated into the assessment in section 9.6.5” is flawed.

At 9.6.5 it concludes: “Instantaneous noise levels at RAAF Base Williamtown” – “It is predicted that instantaneous noise levels at RAAF Base Williamtown and the adjacent passenger terminal will be comparable between the F/A-18A/B Hornet aircraft and the F-35A aircraft and below the Commonwealth and NSW Work Health and Safety Regulation criteria of 140dB for the protection of hearing. There may be unexpected periods of increased afterburner use, which could result in external noise levels approaching, or exceeding Commonwealth and NSW Work Health and Safety Regulation criteria. Management measures already in place at RAAF Base Williamtown will be used to maintain use noise levels within Commonwealth and NSW Work Health and Safety Regulation criteria.”

We are unclear, in the least, to what “Management measures already in place at RAAF Base Williamtown” refers to or their relevance to Newcastle Airport.

That conclusion ignores the simple fact that in excess of 1.2 million members of the public are likely to be exposed to increased noise events. Additionally, approximately 600 workers at the Newcastle Airport site will also be impacted. Work Health Safety legislation obliges NAPL to understand and manage any impacts. We seek further information, which the EIS is clearly lacking in detail and emphasis, to understand the specific implications for the NAPL site.