

9 December 2015

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

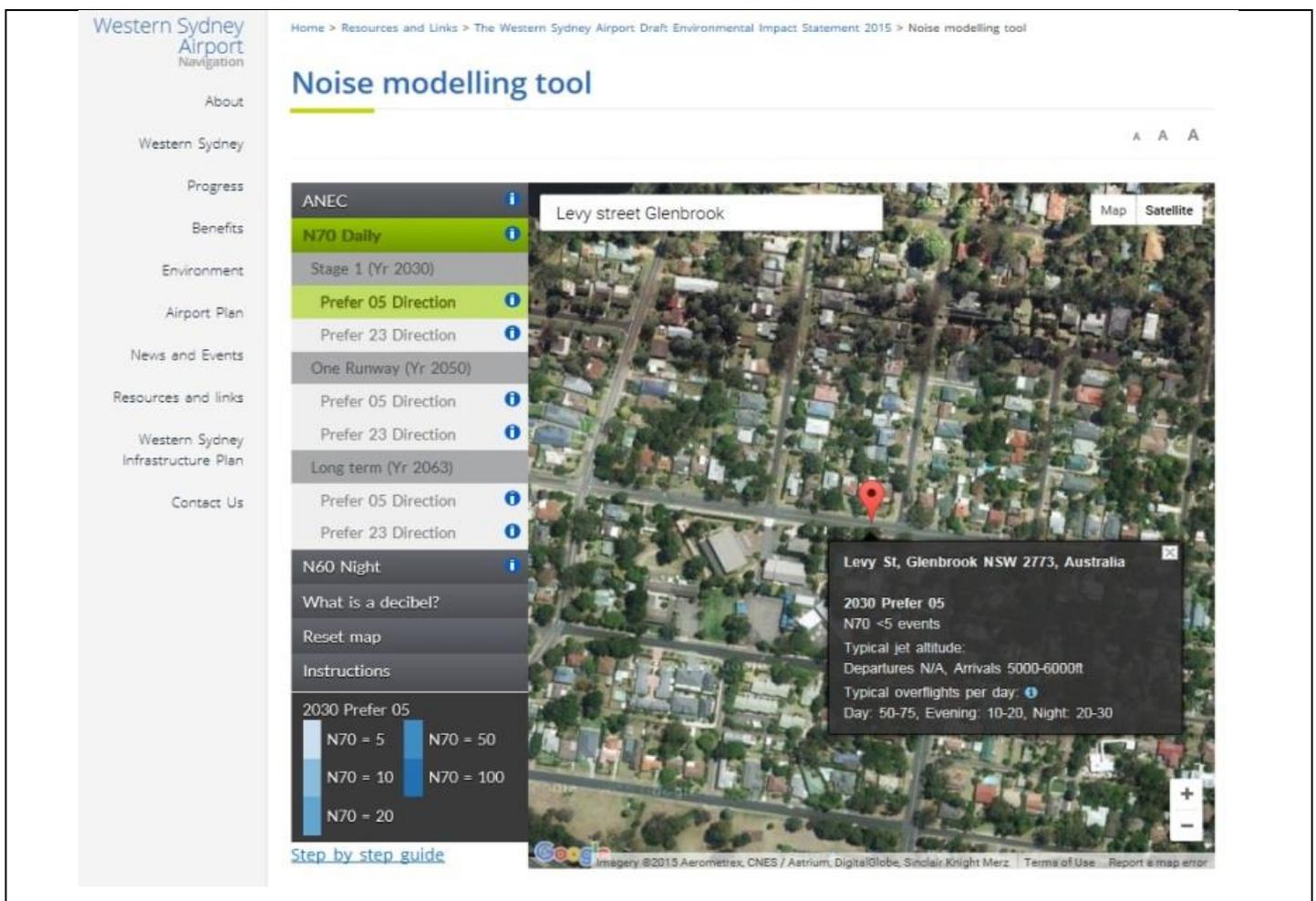
RE: Submission for draft Environmental Impact Statement (EIS) for the Western Sydney Airport at Badgerys Creek

Dear Sir/Madam,

St Finbar's Catholic Primary school is located in the heart of Glenbrook in the Lower Blue Mountains. It experiences low background noise and sits within the Blue Mountains World Heritage Area. It is proudly celebrating its 60th year anniversary which is testament to the educational service it has provided to many generations of children in our local community.

After reviewing the release of the Environmental Impact Statement (EIS) regarding the Western Sydney Airport and proposed flight paths, the St Finbar's Parents and Friends committee feel this current draft proposal will have detrimental impacts on our school environment and the wider community.

Below is an image of the predicted day flights over our school within the next 15 years.



Our main concerns include:- This EIS was developed in 8 months yet the previous 1997 EIS took 2 years to compile. We feel there are many inadequacies in the current EIS, such as it only addresses Stage 1 of operation (first 5 years) and hence fails to outline the full impact of later increased flight movements.

- We as a school community have had minimal time to read and review the EIS. Term 4 is a very busy period for school communities and the limited time given for us to respond to this EIS has been insufficient.

- The noise modelling tool provided in the EIS predicts that students at St Finbar's will be exposed to 1 plane every 8-12 minutes during the day approximately 1500m above school buildings. These same students can then expect 1 plane every 20 minutes at night. This is excessive exposure to noise and it is dramatically different to the low ambient noise environment that currently exists at this location.

- Aircraft noise is different to other traffic noise as plane flights are unpredictable and vary unlike more constant traffic noise (Jones & Rhodes, 2013). The concentration of all arriving flights, 24 hours a day, using the point merger system over our school will increase the environmental noise and expose our children to unacceptable levels of noise pollution.

- There is a wide amount of research and literature that shows children are adversely affected by noise particularly aircraft noise which impacts children's reading abilities, concentration, memory, information recall and can impair cognitive development (Clarke, et al. 2012). By 2050 it is predicted St Finbar's pupils will experience 1 plane every 4-5 minutes daily and every 8 minutes at night. This places an unfair noise burden on our schools and community as no other Sydney suburb or school has to tolerate and withstand this number of flights overhead.

- The EIS did not have any other alternatives to the point merger system. There was no mention of noise abatement strategies such as the consideration of a star system used to alternate flight paths in Sydney or sound insulation that was also implemented in some Sydney suburbs. Many planes will use more fuel having to divert to Blaxland before landing at the airport. There are more direct arrival flight paths which will conserve fuel.

- Sydney airport has a curfew which reduces flights between 11pm-6am. They have an hourly cap on the numbers of flights per day. They share the noise pollution from aircraft by ensuring 55% of planes fly over the ocean and the remaining 45% rotate their flights paths differently each day, further dividing flights from the north, west and south to reduce the impact on local residents and suburbs. These measurements are protected by legislation in the Sydney Airport Curfew Act 1995. Yet these same noise abatement strategies have not been suggested for our area.

- St Finbar's primary students learn in an agile, flexible, open learning space. This can see larger groups of 50 to 60 students working in the one area. The intrusion of reoccurring plane flights every 8 minutes will significantly alter and change the noise levels of this type of learning environment and allow for interruption and distraction of pupils. Our current educational environment is quieter compared to other urban settings with less background noise. The EIS does not address this noise problem and also fails to account for the cumulative effect of the density of noise pollution from the intensity of flights throughout the day and night.

- Our students actively participate in lessons outdoors and we are concerned about aircraft noise exposure and further increases to air pollution on our children. The EIS states there will be an increase in emergency hospital admissions for children suffering from asthma as a result of the air pollution. Repeated exposure to these toxins from aircraft emissions poses a serious threat to the health of children.

- 28 freight planes per day is quoted in the EIS. These freight planes are older, noisier models and will be considerably louder than newer aircraft. The noise modelling needs to be recalculated based on these older aircraft models.

- There is a possibility of aircraft fuel dumping over the Blue Mountains. Ideally it should occur at 6000ft yet planes will be over St Finbar's at 5000ft. We are very concerned that the increased air pollution from frequent plane overflights and possible fuel jettisoning will cause our children very serious health risks.

- The concentration of all incoming flights over St Finbar's school and area will drastically alter the visual, environmental, social, recreational and acoustic amenity of Glenbrook. The negative impacts from the Point merger system will mean that future generations of students at St Finbar's will not be able to experience the same, quiet learning environment.

We respectfully request that the following measurements be reviewed and implemented:

- Other alternatives to the Badgerys Creek site be investigated. These alternatives could include:
 - increasing the operation of Kingsford Smith Airport to 100% capacity and utilising the ocean as flight paths will impact less people;
 - locating a second airport in a locality which will not send large volumes of flights over a World Heritage area and over communities with low ambient noise levels, which are therefore more affected by airport noise.

If the airport proposal for Badgerys Creek is to proceed, we request:

- A full independent investigation, in more detail than the current EIS, which covers
 - the health effects of the proposed airport, including the effects of noise pollution and air pollution on children's health and their cognitive, psychological and physical development; and including
 - testing and exploration of alternative flight paths and management systems that minimize overfly of residents and schools and share the noise pollution equitably.
- Legislation that reflects the same standards applied to Sydney Airport such as a cap on freight and larger, noisier aircraft, daily movement of all flight paths to equably share aircraft noise (such as using the star system) and a restriction/curfew during the night that includes a cap on the number of aircraft movements per hour to 80.
- That the noise levels of flights be measured and capped (including all freight plane types).
- That a decibel penalty be applied to all aircraft in the evening (5dB) and at night (10dB) which is done in Europe to further protect vulnerable groups like children from sleep disturbance.
- Those valid and independent baseline measurements are taken before the development of a second airport to establish what the noise and air pollution levels are now in our community.
- That restrictions are put in place to exclude the Blue Mountains area from possible fuel dumping.
- As the Blue Mountains has a lower ambient noise levels, an insulation program (like double glazing) must be implemented for all public buildings like schools, business and residences impacted by the flight paths particularly under the Point merger system.

Schools exposed to high levels of aircraft noise are not healthy educational environments (Clarke, et al. 2012). St Finbar's school, alongside other educational institutions in our locality will be significantly impacted by the proposed flight paths that send planes, very low, over our community 24 hours a day.

This is an unacceptable burden for vulnerable groups like children to bear and there are more equitable alternatives and flight paths available for the government to adopt.

We urge the Environment Minister to reject this proposed EIS.

We request the Federal Government undertake a more independent and peer-reviewed EIS which addresses all our concerns particularly in relation to children.

On behalf of the St Finbar's P&F Committee 2015.

Dr. Mark Walker (President)

Mrs Jody Cremona (Secretary)

Mr Andrew Grima (Vice- President)

Mrs Jodie Farnsworth (Treasurer)

Bibliography

Clarke, C., Crombie, R., Head, J., van Kempen, E., & Stansfield, S. A. (2012). Does Traffic-related Air Pollution Explain Associations of Aircraft and Road Traffic Noise Exposure on Children's Health and Cognition? A Secondary Analysis of the United Kingdom Sample from the RANCH Project. *American Journal of Epidemiology*, 176(4):327-337.

Jones, K., & Rhodes, D. (2013). *Aircraft Noise, Sleep Disturbance and Health Effects: A Review*. London: United Kingdom Civil Aviation Authority.