

**Draft Central Coast  
Regional Plan  
Submission  
On  
Warnervale Airport**

**23 March 2016**

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# Executive Summary

## Airport Process to date

A Warnervale Airport is not viable, desirable or necessary. It does not comply with the goals of the Central Coast Regional Plan and should not be included in the Plan.

In 2012 the Sydney Second Airport needs study included an airport at Wallarah in the 17 sites studied.

In December 2012, Wyong Shire Council included a variation of the Wallarah Type 3 2,600m airport in their LEP. There was essentially no community consultation on the issue and a series of confused messages from Wyong Mayor Eaton as to what size airport Council intended. It was found through GIPA applications that Council secretly planned to host Sydney's Second Airport. Following submissions from the community, Council's 2,600m Airport was excluded from the final LEP.

## Regional Plan Goals

Warnervale Airport does not comply with the goals of the Regional Plan.

- Goal 1: *Enhance community lifestyles and accelerate housing supply.* Warnervale Airport is incompatible with this goal as it adversely affects community lifestyles and makes living in surrounding areas undesirable. It may render some areas planned for urban release unsuitable, thereby reducing housing supply. Flight paths from the airport, dictated by the runway alignment, will impose aircraft noise on Wyee, Jiliby, Warnervale, Alison, Watanobbi, North Wyong, the new Warnervale Town Centre and adjacent development areas. To the north west, the Lakes Grammar High and Primary schools will also be noise affected, as will to a lesser extent, the Christian School to the south of the airport.
- Goal 2: *Grow and diversify the regional economy.* An airport at Warnervale will effectively contract the Regional Economy by sterilising valuable and unique industrial land, destroying 626 industrial jobs (SGS) and hampering economic diversity. Wyong Council said of the Warnervale Airport site in 2014, "*This will become the employment hub that kick starts the Warnervale Employment Zone development estimated to create 6,000 jobs.*" This employment benefit can not occur if the site is occupied by an airport.
- Goal 3: *Sustain productive landscapes.* 900m of Warnervale Airport is to be located in the protected Porters Creek Wetland which forms part of the drinking water catchment for the Central Coast. The presence of a large airport with an 1800m runway penetrating this pristine environment puts this ecologically sensitive wetland and the water supply at serious

risk of contamination. In future the loss of this water supply could be critical to the intensive water dependent farming taking place in the Wyong area.

- Goal 4: *Protect and manage the natural and cultural environment.* The airport site is surrounded by environmentally sensitive land. The 1,800m runway and safety runoff penetrates 900m into the SEPP 14 and E2 zoned Porters Creek Wetland. Large areas of environmentally endangered habitats will be lost under and adjacent to the runway in order to comply with CASA safety requirements. The runway also impinges on water flow paths through the wetland.

Council's passenger numbers are not supported by the Federal Government BITRE study which shows the Central Coast as the having the lowest share of domestic air trips in the Greater Sydney Metropolitan Area with only 0.6 domestic air trips per capita in the Wyong Shire Demographic and that demographic making up only 11% of GMA airport passengers.

#### **Airport not Sydney Second Airport, for Central Coast only**

Wyong Shire Council documents show the Wallarah LEP and Kiar Ridge airports were intended as Sydney serving international airports, as is the case now with the Warnervale Airport. Despite the irrefutable evidence, Council claims to Councillors, the Administrative Tribunal and the community that their airport is for Central Coast residents only and is not international.

#### **Airport competition**

Wyong Shire Council virtually ignore the existence of Newcastle Airport in their documents. However, Warnervale Airport faces direct and stiff competition from Newcastle Airport, which counts the Central Coast as part of its catchment. When the North Connex tunnel is complete, a Warnervale Airport would also face increased competition from Sydney and in the future Badgerys Creek Airports as travel times to Sydney are reduced.

#### **Airport Consultation**

Wyong Shire Council claim to have "engaged" with the community on their airport proposals. However, despite the Wyong area now being subject to its fourth airport proposal in four years, there has been no community consultation. Council has conducted three telephone polls that included an airport question, two of which put a misleading statement to the respondent prior to the question being asked. In the only poll that counts, the Daily Telegraph, Central Coast Express heavily promoted and Council supported "Fair Go for the Coast" campaign, there were only 1131 signatures on the petition, which prominently featured the Regional Airport. This is only 0.3% support in a population of 350,000.

### **Physical Site Constraints**

The Warnervale Airport site has residential development impinging on most of the site with hills of up to 300m to the west and over 200m to the south. 50% of the site is within the 1:100 year flood effect area of the porters Creek wetland, which forms part of the Central Coast drinking water catchment. The flight path to the south is also directly over the drinking water pumping station on the Wyong River and Mardi drinking water supply dam. On the northern side of Sparks Road is the Endangered Ecological Community of Swamp Sclerphyll Forest and WEZ designated fauna corridor of Buttoderry Creek, which must be cleared for CASA obstacle clearance requirements. To the south lies the SEPP 14 Porters Creek Wetland and Endangered Ecological Communities of Swamp Sclerphyll Forest and River Flat Eucalypt Forest, some 20ha of which must be cleared for the 150m wide runway strip and CASA obstacle clearance requirements. 1.5km north and directly in line with the flight path lies the Mountain at the top of Mountain Road. About 20m would need to be removed from this mountain to comply with CASA obstacle clearance requirements. Another hill to the south, on the corner of Hue Hue Road and Yarramalong Road, Alison impinges on the CASA obstacle clearing requirements and may have to be denuded of trees and houses.

### **Airport intended to be 1800m, designed for Code 4C for B737 and A320 Aircraft**

Wyong Shire Council's claims of Warnervale Airport aircraft type and capacity made in the media are not credible. Wyong Mayor Eaton names 50 seat Dash 8 twin turbo prop aircraft to use the airport in his 28 October 2015 media release. However China Theme Park consultant CAPA, use

Council information to claim 90 passengers per aircraft. In the CBP the design aircraft used by Council is a Code 4C Embraer 190, jet aircraft and Council go to some lengths to explain that code 4C, B737 and Airbus A320 aircraft will be able to use the airport with some off-site earth works. The CBP clearly states on page 45 *“The ultimate Phase design aircraft for the Warnervale Aerodrome will be the maximum Code 4C category....This classification will determine the overall long term planning for runways, taxiways, aprons and airspace under CASA Mos 139.”* Therefore all impacts must assume B737 and A320 category 4C operations as stated.

### **Noise impacts**

The Warnervale Airport site has residential development impinging on most of the site, with the long planned Warnervale Town Centre just a few hundred metres outside the 60dBA noise affect zone and much of Bruce Crescent, to be zoned residential, is within the noise affected area. Most of Watanobbi, the Warnervale University site, the Lakes Grammar School, the present Warnervale Township are within the 60dBA noise affected area, based on the 2030 Port Macquarie Airport projections. Over 50 homes are within the 20ANEF using the 2028 Ballina Airport contours. Half of the Chinese Theme Park site is with in the Ballina 20 ANEF and half within the 25 ANEF. Some homes on Mountain Road are within the Ballina 35ANEF and a number within the 30ANEF.

### **Jobs**

Wyong Shire Council’s job claims for the Warnervale Airport site are not credible. Council claim in their documents 600 jobs for the airport site, comprising 400 jobs from the airport itself and 200 jobs from an aircraft manufacturer. Council fail to explain the basis of the aircraft manufacturer’s job numbers or why an aircraft manufacturer would choose an 1195m x 10m runway at Warnervale Airport over the Bankstown airport precinct that has personnel skilled in aircraft work or the existing 1800m Illawarra Regional Airport. Council’s own SGS Economics Wyong employment lands study on industrial land availability estimates the Warnervale Airport site to be capable of providing 626 direct jobs as the industrial site it is planned to be. According to Wyong Shire Council, the Warnervale Airport site is planned to be Stage 3 of the WEZ land release and expects the area will have a warehousing and distribution focus.

### **Illawarra Regional Airport**

The Illawarra Regional Airport, located 100km south of Sydney Kingsford Smith Airport and in a region of similar population to the Central Coast, is a mirror image of what a future Warnervale Airport would look like. However the Illawarra Regional Airport does not have to compete with the equivalent of Newcastle Airport, just 54 minutes drive away as is the case for Warnervale Airport. The Illawarra Regional Airport has not had any regular passenger flights since Qantas pulled out in 2008. In the 2014-15 financial year Illawarra Regional Airport lost \$141,000 (ex Dep) on revenue of \$585,000. The 2014-15 budget, predicted a \$135,000 loss with depreciation of \$264,000. Assuming the same depreciation as actual for 2014-15, the Illawarra Regional Airport lost \$405,000. Aircraft movements at the Illawarra Regional Airport are in steady decline, with linear monthly movements declining from 1450 per month in 2008 to 1050 movements per month in 2015, despite it having all facilities and paved 1800m and 1300m runways.

### **Warnervale to be an International Airport**

There have been numerous references in the past to a Wyong Shire Airport as an international airport. These references have carried over into the current Warnervale Airport proposal. Wyong Shire Council has featured the future International Airport in its July 2015, Warnervale University expressions of interest, stating under Regional Context *“the proposed Central Coast Regional Airport will further promote the precinct, allowing fast access from all parts of the State, Australia and potentially from international locations.”* This implies an airport even larger than the 4C airport currently secretly planned, is required and intended.

## **Introduction**

What started out as Wyong Council's attempt to secure Sydney's Second Airport before Badgerys Creek was approved has turned out to be a very expensive airport adventure for the ratepayers of the Wyong Shire.

Warnervale Regional Airport is Wyong Council's third attempt at an airport in three years. First was the 2012 LEP Airport, then Kiar Ridge Airport and now Warnervale Airport. All as poorly thought through as the next. None involving consultation with the residents, and all totally flawed.

In September 2014 when the NSW Planning, "Your Future Central Coast, a Discussion Paper" came out for comment, Wyong Council were nearly a year into their Kiar Ridge Airport development.

The latest airport move by Wyong Shire Council, is imposing preconditions to the amalgamation of Gosford and Wyong Councils. The Councils' Mayors and General Managers have asked the NSW Government to repeal the Warnervale Airport (Restrictions) Act 1996, **(1 Appendix 1)** a NSW law that has and is serving the community in protecting their lifestyles, the SEPP 14 Porters Creek Wetland and surrounding fauna corridors from an 1800m airport at Warnervale. An airport that was to close down as recently as last year, to make way for industrial employment as the key component of the Wyong Employment Zone (WEZ).

## **Document format**

Documents provided by me are numbered and referred to in Appendix 1. The document source is identified, along with its date of publishing, where possible.

# The Goals for the Draft Central Coast Regional Plan and the non compliance of Warnervale Airport.

## Goal 1

### Enhance community lifestyles and accelerate housing supply

An Airport at Warnervale is the antithesis of Goal 1. An airport is incompatible with enhanced community life styles by any definition. It may also limit housing supply by making areas currently set aside for housing, for example Bruce Crescent, undesirable due to aircraft noise.

Warnervale Airport is located in the middle of a residential area, surrounded by homes. To the north is Wyee and Mountain Road, to the south, Alison, to the east, Watanobbi, North Wyong and Wyong and to the west, Bruce Crescent, Warnervale and the Warnervale Town Centre.

The proposed flight paths from Warnervale Airport are adjacent to Bruce Crescent, an area currently zoned for urban release and set aside for urban development as long ago as 1975. Bruce Crescent is an obvious second phase development of the Warnervale Town Centre, however if an airport is built at Warnervale, the development of Bruce Crescent for urban use may never proceed, thereby slowing the housing supply rather than accelerating it.

The edge of the flight paths are also only a few hundred metres from Watanabbi, 1.5km from Warnervale Town Centre, right over Wyee, Alison and the proposed rural residential development at the Old Mardi Farm. The 2028 Ballina Airport ANEF (**2 Appendix 1**) overlaid to the same scale on Warnervale Airport (**2a Appendix 1**) gives an idea of the direct ANEF noise impact. The 2030 Port Macquarie Airport N60 noise contours (**104 Appendix 1**) over laid on Warnervale (**104a Appendix 1**) to the same scale shows how wide the of noise impact will be experienced.

Aircraft will have to overfly much of the Wyong Shire as part of the approach and circling required into Warnervale Airport. While Aeropelican no longer operate from Belmont, the aerodrome still operates and it is unlikely CASA would allow circling over the hills to the west of Warnervale. Wyong Council's 1995 AMBIDJI REPORT ON FEASIBILITY STUDY PROPOSED CODE 3C OPERATIONS AT WARNRERVALE AIRPORT, NSW (**3 Appendix 1**) says "*with installation of a NDB, only a circling approach from the South-East to a minimum altitude of around 1400 feet (ceiling 1390 feet) for a category C aircraft (Bae 146) is feasible. This relatively high minimum altitude could be reduced to around 1150 feet (ceiling 1140 feet) by limiting circling indicated airspeed for Category C aircraft.*" The proposed circling path over The Entrance, Bateau Bay, Long Jetty and Wyong is shown in the attached diagram. Wyong Council has stated their intention that Warnervale is to take Code 3C aircraft.

The AMBIDJI Report also says "*The Civil Aviation Authority (CAA) have expressed reservations about the suitability of the runway for instrument operations due to obstacles penetrations, and mentioned the need to reduce the impact of the penetrations.*" This aspect of operations at Warnervale will be dealt with later in this submission. However the existing runway alignment selected by Wyong Council for their airport, rather than that approved by the Minister, which has a more westerly orientation, has more obstacles to deal with, including a 50m mountain at the top of Mountain Road. The approved alignment, while not perfect, was largely selected because it avoided such obstacles, as stated by AMBIDJI, "*the orientation of runway 01/19 has been chosen so that the centreline extended to the North passes between the two obstacles. However the position of the obstacles is far from ideal, being close laterally to the approach path for runway 19.*"

In the Draft Letter to the Directorate of Aviation Safety Regulation, one measure suggested to reduce OLS issues is to “*Clear vegetation on both close-in obstacles on the 19 approach to ground level.*”

In 1973 (**4 Appendix 1**) Wyong Shire Council applied to The State Planning Authority of NSW for “*an aerodrome for light aircraft*” at Warnervale. The Department wrote to Council saying “*the Authority has decided to raise objection to the construction of an airfield in this location for the reasons that:*

- (a) the proposal may have an adverse effect on the strategic studies of the Wyong area; and*
- (b) the likely effect of the proposal on the creek system in this area cannot be determined at this stage”*

Much residential development nearby has taken place since, with the Warnervale Town Centre now underway. Thus the above objections have even more relevance today.

The 1998 “*Shaping The Central Coast*” (**5 Appendix 1**) planning document only mentions the existing airport which has a runway length of 960m. The fact that Planning NSW acknowledge the runway as 960m is important in the context of Council illegally lengthening the runway to 1195m and subsequently denying they had lengthened the runway.

The 2006 “*Draft Central Coast Regional Strategy*” (**6 Appendix 1**) makes no mention of an airport. The WEZ is featured, without an airport evident.

There is no airport in any NSW Government planning document or study and the residential development around Warnervale has proceeded on the assumption that there will be no airport.

## **Goal 2**

### **Grow and diversify Regional Economy**

An Airport on the Warnervale IN1 zoned site, rather than the industrial estate currently approved as part of the Wyong Employment Zone (WEZ), was until last year promoted vigorously by Wyong Council and I understand is still supported by Planning NSW and the NSW Government. An airport on the site will effectively contract the Regional Economy by sterilising this valuable and unique industrial land, hampering economic diversity in the process.

Wyong Shire Councils’ Warnervale Airport Business papers predict 600 jobs from airport. I will show later in this submission that this projection is without foundation. However, Council’s SGS (**7 Appendix 1**) Economics and Planning, *Wyong employment lands study and industrial land audit* finds on page 3 that the WEZ Airport Lands are to provide 626 jobs. Using the job multiplier of 2.4 for the Warner Industrial Park (**8 Appendix 1**) a further 1517 jobs in the wider community will result, for a total of 2143 jobs. Jobs the Shire needs and can have very quickly.

Council is said to have just paid \$1.8m for 140 Sparks Rd on the corner of Jack Grant Drive and Sparks Rd as part of their airport. **(10 Appendix 1)** Only 3.4Ha of the site is zoned IN1. This sale would value the 31 Ha airport site at \$16.4m for industrial use.

The Wyong Employment Zone(WEZ) should continue to be supported in its entirety by Wyong Council and the NSW Government and take precedence over any airport proposal.

Wyong Council certainly supported the industrial development of the Warnervale Airport site in preference to an airport as late as December 2014 in their “*Transforming The Central Coast*” submission to the NSW Government **(11 Appendix 1)**, stating:

**“OLD AIRPORT”**

**WARNERVALE ICONIC SITE DEVELOPMENT**

**DECEMBER 2014**

***Warnervale Airport is a significant land holding of Wyong Shire Council that is strategically located in the Wyong Employment Zone (WEZ). It features 190 hectares of flat General Industrial zoned land just minutes to the M1 Motorway and Sparks Road intersection.***

**Overview**

*This site has the potential to make a significant contribution to job creation and economic development for the Shire as an employment hub with excellent logistical and transport access.*

**Benefits**

- *This will become the employment hub that kick starts the Warnervale Employment Zone development estimated to create 6,000 jobs.”*
- *The development of this key strategic land holding will **stimulate investment** from the private sector and begin to create the employment opportunities required to sustain Wyong Shire’s population growth over the next 20 years.*
- *With its close proximity to the M1 Motorway, it has excellent road transport access catering for logistics and freight industries.*
- *The infrastructure required to commence the development will also assist with providing an alternative flood free access for the residents in the northern part of the Shire to the Wyong town centre.*
- *Location is central to key developments such as the WEZ, Education and Business Precinct, Regional Airport and the Warnervale Town Centre.*

**Key Issues**

- *Resourcing of infrastructure required including attraction of private investment once infrastructure is developed.*

**Project Plan/Timelines**

- *This project can commence on the availability of funding for road infrastructure.*

**Costs/Budget**

- *Infrastructure construction \$58m.*

- *Site development costs: estimated to be in excess of \$1b (Council and Private sector)*

***What is sought from Government?***

- *Contribution for essential infrastructure to commence the development \$13m*
- *Reduction in State Infrastructure Contributions.*
- *A signalised intersection at Sparks Road/Jack Grant Avenue intersection \$8m.*
- *The reconstruction of Jack Grant Avenue \$5m*
- *Construction of stage 2 Link Road \$45m linking Wyong Civic Centre to the airport development site and the new Town Centre.*

Who could argue with the contents of this impressive document and its noble aims. In fact had the NSW State Government provided the funding requested, the industrial development of the site would now be well underway and any use as an airport long forgotten as the Shire looked forward to the industrial jobs promised by Council for the site. What a site it is too. As Council state, it is strategically located, flat, in close proximity to the M1, the employment hub and will stimulate investment.

The “Old Airport” is the only shovel ready site in the WEZ and the only one that can be developed now. It is serviced with power, water, sewer and nearby road infrastructure and as Council says, it is flat and strategically placed. Surely such a site, that is so critical to the development of industry in the Shire should not now be converted into an airport that I will show within this submission is doomed to failure. Any change from the intended industrial development of the site as espoused so eloquently by Council to an airport, would have to be considered as a whim, a knee jerk development at odds with decades of planning and completely contrary to not only the facts but to the intent of the WEZ. In this context, the “Your Future Central Coast Discussion Paper” highlighted the shortage of Central Coast industrial land that was close to being able to be used.

None of the other sites within the WEZ are within years of being shovel ready.

The “Old Airport” site as Wyong Council terms it, is part of the WEZ. According to Wyong Council’s WEZ fact sheet (**12 Appendix 1**) published in May 2010 under

*“Background*

*initial investigations and commencement of the rezoning process for the WEZ began in late 2005.*

*On July 2006, The Minister for Planning declared the WEZ a State Significant Site under Part 3A of the Environmental Planning and Assessment Act 1979. This was done in order to expedite the rezoning process for the area. The rezoning was gazetted on 7 November 2008.”*

As a key part of the WEZ, Warnervale Airport came in for special and significant mention.

*“The Warnervale Airport operates on land leased from Wyong Shire. It is a permissible land use in the new IN1 zone and will continue for the time-being under the current lease and new zoning.”*

Warnervale Airport (or authorised landing area as it is designated by CASA regulations) was clearly operating only temporarily within the WEZ.

Part of Goal 2 is to *Enhance the Warnervale employment lands*. The development of an airport on THE key site in the WEZ is totally contrary to this aim.

Goal 2, page 25. *“The economic centres and regional economic corridors of the Central Coast are located within 100 kilometres of the nation’s biggest market, Sydney (including Sydney International Airport)”*

While I will expand on this point later in my submission, it is the Central Coast location between the two largest cities in NSW and its close proximity to a market of approaching 6 million people (1.5 million more than live in the whole of New Zealand), that is the very reason why it does not require its own airport and why there is no excuse whatsoever for tourist visitor nights to be so poor when all those areas around the Central Coast are doing so much better.

## **Goal 3**

### **Sustain productive landscapes**

The Porters Creek Wetland in which some 900m of Wyong Council’s airport is proposed to be located, forms part of the drinking water catchment for the Central Coast. The presence of a large airport with an 1800m runway penetrating this pristine environment puts the water supply at serious risk of contamination. The current example of PFOS, Perfluorooctane fire fighting foam contamination of the surface and ground water from Williamtown RAAF base is a prime example of the level of risk. Risk of fuel and other petrochemical contamination must also increase should a large airport be built.

The bulk of the water for the Central Coast water supply comes from Wyong River, which is a controlled river also used for agricultural purposes. There is a water sharing plan in place to protect the river ecology with cease-to-pump limits in place at low flows. In a future drought and as has occurred in the past, the Porters Creek water may be all that stands between agriculture surviving and a cease-to-pump, causing crop failure. Therefore keeping the Porters Creek Wetland clear of contamination is important for the Central Coast water supply and agriculture. The southern Flight path from Warnervale Airport takes aircraft directly over the water supply pumping station on Wyong River and the Mardi Dam.

Action 3.1.1 is only possible if the water supply is consistent and clean.

Action 3.2.2 says that future rural residential development will: not impact on drinking water catchments. The impact of an airport in the Porters Creek Wetland has far more potential to adversely impact on the drinking water via spills, accidents and fall out than any rural residential development.

## Goal 4

### Protect and manage the natural and cultural environment

An Airport at Warnervale clearly contravenes this goal.

During the extension of the Warnervale Runway from 960m to 1195m, Wyong Council stock piled fill against the wetland in the south east corner of the airport site. **(13,14 Appendix 1)** At no stage, (until pointed out on my blog site) did Council install any silt fencing and after being alerted, only installed silt fencing where it could be seen at the northern end of the stock pile. **(15 Appendix 1)** Council also pushed fill into the eastern side of the wetland. **(16,17 Appendix 1)** The airport site is surrounded by environmentally sensitive land. The WEZ zoning map **(18 Appendix 1)** shows the E2 zones around the airport to the east. Also to the south lies the Porters Creek Wetland, zoned E2 and SEPP 14.

Wyong Council's BioCertification Report for the WEZ **(19 Appendix 1)** Figure 4.8 shows Buttonderry Creek on the north side of Sparks Road which is part of a major fauna corridor and which must be essentially flattened to satisfy the CASA Obstacle Limitation Surface (OLS) requirements for an airport. The need to "clear vegetation ...to ground level" is confirmed in the Ambidji Report. The planned 1800m runway runs through Wallum Froglet habitat and areas of *Grevillea parviflora*, *Melaleuca Biconvexa* and *Arachnorchis tessellata*.

The "WEZ, *State Significant Site Study*" **(20 Appendix 1)** prepared by Wyong Council in January 2008 covers a number of the issues associated with Warnervale Airport as a site. Under "WEZ precincts:

***Warnervale Aerodrome and Surrounds, Warnervale***

*The Aerodrome Stage 3 = 31 hectares (includes road Jack Grant Avenue)*

#### ***Aerodrome – Stage 3***

*The Warnervale Airport Site will continue to operate as a local airport until such time that Council makes a decision on the ultimate use of the site. This area is referred to as Stage 3. It is expected that this area will have a warehousing and distribution focus. It is proposed to rezone this area to 4(e) (Regional Employment Development Zone).*

*(a) The WEZ has some strategic attributes which make it a desirable location to establish an employment node. These include:*

- *Close to Sydney-Newcastle Freeway*
- *Located nearby the planned Warnervale Town Centre and proximate to planned residential developments which means potential employees can live within close proximity to their place of employment.*

- *Builds a large employment cluster around the existing Warnervale Business Park where Woolworth's has already built a regional distribution centre.*
- *Located between two major cities (Sydney and Newcastle) which make the location attractive to a large range of potential firms.*

*(b) Be of regional or state environmental conservation or natural resource importance in achieving State or regional objectives. For example, protecting sensitive wetlands or coastal areas; The WEZ study area and areas immediately downstream contain a number of State and regional conservation issues which must be properly addressed as part of the SSS Study and planning process. These include:*

- *Porters Creek Wetland is the largest freshwater wetland on the Central Coast. This wetland is recognised to be of State conservation significance as it is designated as a SEPP 14-Coastal Wetland.*
- *Porters Creek Wetland and swamp forest communities within the WEZ study area require a continuation of the natural wetting and drying cycles to maintain its existing vegetation and swamp forest communities and high species diversity. The wetland contains many threatened species and endangered communities of State and National significance.*
- *Effective wildlife corridor planning outcomes are required to be incorporated into any planning for the WEZ to ensure that Porters Creek Wetland is linked to the extensive natural areas which exist in the Wallarah Creek catchment. This wildlife corridor is extremely important for (sic) as it forms the only major north-south wildlife corridor which is located to the east of the F3-freeway in Wyong Shire.*

*(c) The best mechanism for this to occur is through its inclusion on Schedule 3 of SEPP (major project), 2005.*

#### **SEPP 14 – Coastal Wetlands**

*The aim of SEPP 14 is to ensure that certain wetlands are preserved and protected in the environmental and economic interests of the State. The subject site is located within the Porters Creek catchment. Porters Creek Wetland is a SEPP 14 wetland, however no development is proposed within the areas nominated on the SEPP 14 maps (see Figure 3.1)*

#### **Table 4.1: Potential Contaminated Sites**

*Lot 3 DP 1007500 Aerodrome”*

It can be seen from Figure 4.11 that the Warnervale Airport site is fully serviced.

#### **“4.2.4 Warnervale Aerodrome**

*Warnervale Aerodrome currently operates in the southern portion of the WEZ. The land is currently leased from Council to the Central Coast Aero Club Ltd until August 30 2021. It can be characterised as being a local scale airport facility based on its dimensions (970 metres long) and the relatively small types of aircraft that use a single runway.*

*In December 1993, Council resolved to upgrade airport facilities by lengthening and widening the runway to 1800 metres and 150 metres respectively. The effect would be to raise the scale of the airport to what can be characterised a regional scale airport facility.”*

This Council document speaks of more than just the significance Council and Government place on Porters Creek Wetland but also the fact that the 31 Ha Warnervale Airport site is set down for specific release as stage 3 and intended for warehousing and distribution. In this context, IKEA have approached the CCRDC as they are looking for just such a site for a large single level store

within a kilometre of the expressway. Why not have these actual environmentally friendly jobs as opposed to a non viable airport pushing 900m into the Porters Creek Wetland.

The Warnervale Airport EIS 1993 shows the Porters Creek Wetland fauna habitats affected by an 1800m runway in Figure 11.1, although on the 02/20 alignment not the current alignment. **(20a Appendix 1)** This direct impact can also be gauged from the aerial view of the Warnervale Airport site and wetland to the south of the existing runway.

**(20b Appendix 1)**

Wyong Council's Biocertification Report on the WEZ discusses in;

5.5.2 Wildlife Corridors. **(21 Appendix 1)** This discusses two potential corridor routing options. Option 1 to the east of the existing Warnervale Airport.

Option 2 is located between the Warnervale Business Parks and Warnervale Airport. This option is not preferred and just as well, because operations at a new airport would make it impractical.

The fauna corridor along Buttonderry Creek is discussed in the context of the upgrading of Sparks Road. *“Council is in the process of negotiating an appropriate mix of fauna sensitive design measures to facilitate fauna dispersal over this barrier with the NSW Roads and Traffic Authority. These proposals involve split carriageways and planted vegetation islands. The vegetation community should comprise trees, tall and low understory and ground layer vegetation to cater for a suite of fauna species.”*

Should an airport be built then essentially no trees would be permitted for a distance in excess of 150m along Sparks Road opposite the airport runway to cater for CASA, OLS safety requirements.

### **The Draft Plan**

**Direction 4.2** *Sustain water quality and security*

*“The draft Plan aims to protect water catchments, to sustain high quality and dependable water supplies across the region.”*

An airport in the Porters Creek Wetland, part of the water supply for the Central Coast, is incompatible with this aim. Figure 4 from the Australia China Theme Park proposal shows the **Existing 1 year AEP Flood Map and Blue Lines. (22 Appendix 1)**

The entire airport expansion is within the flood area shown.

Wyong Council 1995 Warnervale Airport EIS page 57 : under 9.5.2 *“Impact Of New Runway On Flooding The resulting estimated increase in flood level is less than 50mm.” (23 Appendix 1)*

Any increase in flooding as a result of displacement of water by the runway will only add to the fact that the runway interferes with flows from Buttonderry and other creeks and is surely not acceptable.

Page 57/58 : **(24 Appendix 1)** Under *“9.5.3 Stormwater Drainage Systems “The system comprises a network of table drains/open channels and culvert crossings beneath runways and taxiways. These culverts are to extend for the full length of the graded strip.”*

### Water Quality

*The expansion of Warnervale Aerodrome has potential to affect water quality in the Porters Creek catchment...*

Page 60 **(25 Appendix 1)** : *Pollution Control Safeguards*

*The most significant potential risk would occur from accidental aircraft fuel spills.*

### Table 9.5 Major Pollutants

The list of pollutants includes

*Aircraft fuel  
Diesel  
Oil/grease and solvent cleaners  
Rubber detritus”*

**(26 Appendix 1)** *Figure 4.2 Existing Drainage Flow Path*

Shows the 01/19 1800m runway proposed by Council in the 1995 Warnervale Airport EIS. The restriction posed by an 1800m runway on the current alignment is worse than that depicted in Figure 4.2. The 100 year flood line approximates to that in the earlier Australia China Theme Park diagram.

The risk of an environmental catastrophe is magnified far beyond that of the existing aerodrome and small aircraft, once an 1800m runway penetrates Porters Creek Wetland and millions of litres of jet fuel are involved.

**Action: 4.2.2** *Sustainably manage surface and groundwater*

*“The NSW Government will:*

*Require decision-makers to minimise the effects of developments on waterways (including watercourses, wetlands ...) to meet water Quality and River Flow objectives: and  
Implement a risk-based decision-making framework to manage water quality and waterway health in the region, including the catchments of all coastal lakes and estuaries where there is planned development, prioritising high environmental value lakes and estuaries...”*

An airport at Warnervale with an 1800m runway penetrating the E2 and SEPP 14 zoned **(27 Appendix 1)** Porters Creek Wetland, part of the Central Coast water supply is inconsistent with the statements above.

The proposed NSW Coastal Management State Environmental Planning Policy introduces a 100 metre perimeter around SEPP 14 wetlands that must be considered by consent authorities for development in the perimeter area. **(28 Appendix 1)** This new matter for consideration is as follows: *“Development consent of a coastal wetland must not be granted to development of land within the 100 metre perimeter of a coastal wetland unless the consent authority is satisfied that the development will not significantly impact on:*

- the biophysical, hydrological or ecological integrity of the adjacent coastal wetland, or*
- the quantity and quality of surface and ground water flows to the coastal wetland if the development is on land within the catchment of the coastal wetland.”*

Warnervale Airport’s 1800m runway and associated development requirements such as clearing of vegetation does not comply with the above.

**“Action: 4.3.1** *Apply contemporary risk-management to coastal, man-made and other hazards  
Other man-made hazards that will need to be considered include land contamination and rail and road noise.*

*Work with councils so that man-made hazards such a mining-related surface subsidence, land contamination and road and rail noise are considered in future planning and development controls;”*

Road and rail noise pale into insignificance when compared to the aircraft noise that will be experienced by those living around Warnervale Airport, should it be built. The concerns expressed above should be applied to aircraft noise. Residents around the current airfield have been assured on a number of occasions since 2005 by Wyong Shire Council (including in the WEZ information release) that Warnervale Airfield is to close down and job producing factories built on the site.

Residents have also believed they were protected from any development at the airport by the Warnervale Airport (Restrictions) Act 1996.

**Sunshine Coast Airport Expansion pro rata to Warnervale**

The Sunshine Coast Airport runway pro rata cost of \$99.5m plus escalation, also supports the Ernst & Young costs

## **Port Macquarie Airport Expansion**

Port Macquarie Airport expansion was studied in 2010. A number of development scenarios were explored with capital costs ranging from \$48m to \$59.8m **(120 Appendix 1)**

Option A was chosen on the basis of cost benefit. The report said, *“The results from the cost-benefit model demonstrate that only Options A / A\* are economically justified at this point in time, based on the set of assumptions used in the model, with Option A\* providing greater economic and financial potential over the 20 year assessment period.”*

Option A\* included the extension of the existing 1600m x 30m runway to 1800m x 30m, a new parallel taxiway, upgraded car park, terminal building and GA apron for a 2010 capital cost of \$48m. In today’s dollars, using Ernst & Young inflator from Sydney Airports Assumptions Book of 4.5% per year 2016 cost is approximately \$59m.

Port Macquarie is an existing 1600m airport only being upgraded. It has an existing market for passengers albeit only from and to Sydney.

All the Port Macquarie facilities, services and roads are already in place, and yet the capital cost for just an expansion is \$48m in 2010 dollars or \$59 in 2016 dollars, using Ernst & Young 4.5% per year escalation in construction costs.

## **Illawarra Regional Airport Expansion**

In 2010, Shell Harbour City Council engaged AMPC, Worley Parsons who did much of the groundwork for the Sydney Second Airport Joint Study, to study the possible expansion of Illawarra Regional Airport. The study proposed two development concepts, one to upgrade the existing runway and facilities to Code 3C for Dash8-400 and EMB 170 aircraft at a capital cost of \$90m and the other for an upgrade of existing runway and facilities to 4C for B737-800, 180 seat jets for a capital cost of \$130m. **(122, 123, 124 Appendix 1)**

## **Illawarra Regional Airport**

Illawarra Regional Airport is a failed RPT passenger airport. In 2008 Qantas pulled out their Dash 8-200 service to Melbourne and no RPT service has returned. The Illawarra Regional Airport is 100km south of Sydney KSA, the same distance as Warnervale Airport is north of Sydney KSA. The region has about the same population as the Central Coast, although they have a higher demographic and so is in effect a mirror image of Warnervale Airport and the Central Coast. Illawarra Regional Airport has no equivalent of Newcastle Airport to compete with and yet still can not sustain even a 36 seat aircraft service. I understand investigations are underway into reinvigorating the RPT service, which according to management within Shellharbour Council, is in

The poor income from fees can be seen in the Shellharbour financial statements **(125 Appendix 1)**

## **Newcastle Airport**

Newcastle Airport has been found by Ernst & young in their Sydney Second Airport study to have the lowest passenger costs of any airport studied at about \$5 per passenger **(126 Appendix 1)**.

An indication of the real world of aviation can be obtained from a 22 August 2014 article in the Newcastle Herald *Jetstar plans to cut Newcastle Brisbane flights. Jetstar has announced plans to cut flights between Newcastle and Brisbane on the back of landing fee increases it says are “excessive” and “way outside the range” of similarly sized airports.* **(128 Appendix 1)**

In another Newcastle Herald article of 24 September 2014, *Stoush over landing fees sees Jetstar threaten job losses and increased airfares. The article says As a 10 year contract draws to a close on September 30, the Newcastle and Port Stephens-owned airport wants to increase the landing fee it charges Jetstar by \$1.70 per person – an amount that would allow the airport to break even on the cost of landing a Jetstar flight for the first time since 2008.* **(129 Appendix 1)**

*“They’re making a profit of \$5m a year....and are enjoying the traffic that Jetstar is generating,” Mr Hall said.*

## **Location, Location, Location**

The location of Warnervale Airport differs from all those airports Wyong Council use as comparisons and those that it excludes, in the fact that Warnervale is 14km inland from the coast and all other airports are on the coast. Most of Council’s comparison airports have most of their flight paths, approaches and circling paths over the ocean. A location adjacent to the coast applies to regional airports at Moruya, Illawarra, Newcastle, Port Macquarie, Coffs Harbour, Ballina, the Gold Coast and Sunshine Coast. This is not a small distinction as a coastal location minimises the areas over flown by aircraft and therefore minimises the negative impact of noise on the population.

The location of Warnervale Airport could hardly be worse, 14km from the coast, surrounded by residential development, with residential development under the circling path and between the airport location and the coast.

Ultimately, Warnervale is a very poor choice for an airport location for many reasons. This poor choice has only been made out of desperation on the part of Wyong Council. The fact is that there is no suitable location for a regional airport on the Central Coast, with the possible exception of Somersby and in any case a Central Coast airport is not viable, desirable or necessary.

A fundamental problem with Warnervale as the Central Coast Regional Airport is that it is only just in the Central Coast, being only 4km from the Hunter Region boundary. In Region that spans some 54km. Of the Somersby airport site the Second Sydney Airport study states it **(131,132,133 Appendix 1)** to be “ the best site on the Central Coast”. It was the best site for a number of reasons. Somersby has an RBCR at 0.9 and an NPV -0.1, as opposed to Wallarah, which is next to Warnervale, having an RBCR of just 0.5 and an NPV of -0.8. Somersby ranked 7<sup>th</sup> and Wallarah last of the 17 sites studied. Somersby had 236,600 N70 person events whereas Wallarah had 1,048,700 N70 person events, over four times worse than Somersby. Interestingly the Sydney Second Airport study did not select Warnervale as a suitable site for any airport.

The most important reason for a Somersby airport is its position in the middle of the Central Coast. Unlike Warnervale, Somersby actually serves the Central Coast.

I do not advocate a Somersby airport, I just point out the obvious in relation to Warnervale, it does not serve the Central Coast.

## **Noise Impact on Buddhist Contemplation Centre**

The Chinese Theme Park, actually a residential development of 240 home units, is located adjacent to the north western end of the Warnervale Airport. The home unit development, also known as Buddhist Monk pilgrim accommodation is within the 20 and 25 ANEF of Warnervale Airport, when the Ballina Airport 2028 ANEF **(134 Appendix 1)** is overlaid onto the Warnervale Airport site. The Buddhist home unit development in this location does not appear to comply with ANEF land use rules. **(135 Appendix 1)**

While a home unit development in an industrial IN1 zone does not comply, the situation is worse when the ANEF is overlaid and the pilgrim portion of the home unit development is within the 20 and 25 ANEF.

Wyong Shire Council and Australia China Theme park have submitted ANEF contours for Gateway approval and to the JRPP on the basis of the existing small aircraft use of Warnervale Airport. **(136 Appendix 1)** When the Ballina Airport ANEF is overlaid onto Warnervale Airport, the 25 ANEF and 20 ANEF impinge on the China Theme Park site. **(135 Appendix 1)** This impact was not declared to either Planning NSW in the Gateway application, or to the JRPP. The Obstacle Limitation Surface figures used in the Gateway also are also for the current small aircraft runway of 10m wide. **(137 Appendix 1)** The intended runway strip is 150m wide and the 40m high and 50m high Obstacle Limitation Surface contours impact on the Theme Park site, limiting the height of the development. **(138 Appendix 1)**

## Wyong Plan Could ‘Split Market’

In August 2014, in the Newcastle Herald, Newcastle Airport CEO Paul Hughes questioned the impact of Warnervale Airport on the Hunter regional airport’s bottom line. **(139 Appendix 1)**

*A Central Coast airport so close to Newcastle could “split the market” he said.*

Newcastle airport’s catchment of 1.2 million people currently includes the Central Coast.

*“I hope when they do their feasibility assessments they think about what the impact is of splitting the market”, Mr Hughes said.*

*“If you split a good sized market, what’s the final impact of that? That’s the big question that needs to be asked and answered. I couldn’t see it being a wonderful result for ourselves.”*

*A feasibility assessment of the \$250million Wyong airport proposal would have to consider if the Central Coast needed “another piece of expensive infrastructure that close” to Sydney and Newcastle airports he said.*

He also had concerns about flight frequencies from the proposed airport. *“To serve a population well as an airport, you need to have frequency,” he said.*

Wyong Shire Council is a member of the Australian Airports Association (AAA). The Chief executive of the AAA, Caroline Wilkie, who while praising Wyong Council’s vision (as you should for your member Council, the whole objective of joining) said *there were many issues to be addressed.*

*“Who would go there? What’s the market? Who are the potential customers?”*

Ms Wilkie said, *The association was aware of cases in NSW where customers drove to larger airports, despite having smaller airports closer to them, because they wanted to fly in larger aircraft.* I would add that customers also want flexibility and regular frequent services as raised by Mr Hughes.

Ms Wilkie said, *“Wyong and Newcastle are close. The question is if the Central Coast is going to grow enough to make Wyong stack up financially”* I believe I have presented sufficient data including the BITRE Report that shows there is not and never will be a sufficiently large market.

Mr Eaton said *the productive Ballina regional airport was about the same distance from the thriving Gold Coast airport as the proposed Central Coast regional airport from Newcastle.* I would add that Ballina Airport made only \$390,000 cash profit last year (on 434,000 passengers, just

effectively a loss after depreciation

Ballina does not have Sydney and Badgerys Creek to compete with as well as Newcastle and the water in this holiday resort destination is warmer than The Entrance. More importantly Ballina sourced 98.5% of its passengers from Sydney on 2010/11 figures. It is unlikely that this percentage has altered materially.

## Avalon Airport

According to The Australian, the Victorian State Government have handed a \$12m subsidy to Jetstar to keep them flying out of Avalon Airport, 56km southwest of Melbourne. This is the reality of airports and is directly applicable to a Warnervale Airport competing with Sydney, Newcastle and Badgerys Creek. Avalon was an existing airport complete with all necessary facilities,.

## **Grafton Airport**

Grafton Airport is yet another Regional Airport losing \$186,147 in 2009-10, with passenger numbers declining. **(141 Appendix 1)** The Clarence Valley Council have I understand been successful in obtaining a Government grant to sustain the Airport. In the case of Warnervale Airport, which is so clearly doomed to failure, why go there at all? Surely should an airport ever be built, the Wyong Shire Council would have their hands out for Government support indefinitely.

## **Conclusion**

There is clearly no place in the Central Coast Regional Plan for this totally unjustified airport that is contrary to the goals of the Central Coast Regional Plan and I request that there is no airport in the final Plan.