

# *Development Watch Inc*

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## **SUBMISSION BY DEVELOPMENT WATCH INC.**

### **on SUNSHINE COAST AIRPORT AEIS/EIS**

1. Development Watch submits the proposal to expand the Sunshine Coast Airport (SCA) does not comply with the Sustainable Planning Act in that:
  - a. The need for a fourth international airport in South East Queensland is questionable and has not been substantiated.
  - b. The economic viability of the current airport is open to question, as the available records suggest that the airport is operating at less than 10% capacity. The airport is not constrained operationally, but by lack of patronage. Based on the figures prepared by the proponents in the original EIS, the investment of \$347 million in expanding the airport delivers almost no benefits in terms of increased flights to the airport.
  - c. Community involvement in decision-making has been lacking throughout this process. The Council and the Airport have avoided public scrutiny of the financial position of the airport and have not released information about the incentives offered to carriers to operate from the airport. The community has therefore not been sufficiently informed about the true status of the airport, and has not been involved in any decisions about the operation or expansion of the airport.
  - d. The proponents have not seriously considered the adverse economic impacts of development. They have

not seriously considered the 'do minimum' scenario in any of their economic assessments. The proponents have not given sufficient information to the Commonwealth & State authorities or the public in order to make an informed judgement about the hazards and economic and social costs of the airport expansion and realignment.

- e. The proposed expansion of the airport will severely degrade the Mt Coolum National Park, bisecting it and greatly harming the aesthetics of the coastal plane. This is unarguable. The Mt Coolum National Park is an area acknowledged for its ecological significance. The national park will be irretrievably disconnected by the construction of the new runway, and while the proponents go to some lengths to portray their proposed system of offsets as best practice, it is unarguable the park itself will be irreversibly damaged. Moreover, the stunning vista of Mt Coolum as seen from the Sunshine Coast Motorway – one of the great visual landmarks of the Sunshine Coast beloved by residents and visitors alike – will be tarnished by the destruction of 55 ha of coastal forest and the extension of the runway right to the edge of the motorway.

- 2. The EIS and the AEIS is deficient and raises the following issues/questions:
  - a. Neither the EIS nor the AEIS addresses interactions with Brisbane Airport. The proponents have dismissed the relevance of other infrastructure projects, with no proper examination of the various transportation options in south-east Queensland, and no analysis of the effects of other airport competitors in the region. In the AEIS, the proponents have dismissed specific comments relating to other airports in south-east Queensland, but provide no data to support any of their claims around the lack of effects of Brisbane Airport. There has been no proper analysis of the origins and destinations of passengers to and from those other airports in the region, no analysis of the numbers of Sunshine Coast residents who would use Brisbane Airport under the 'do minimum' and 'new runway'

scenarios, and no information about the impact of an expanded Brisbane Airport on the competitiveness of the Sunshine Coast Airport's proposed international operations to Asian ports.

- b. The proponents claim that the Sunshine Coast airport expansion will provide services that reduce the necessity for trips to Brisbane Airport. There is no evidence in the EIS or AEIS to support the claim that the new runway will reduce the need for trips to Brisbane Airport. The original EIS makes clear that the projected growth in aircraft operations under the SCA expansion runway will be trivial compared with the projected growth in aircraft operations.
- c. An expanded Sunshine Coast Airport claims to "...facilitate direct access to all national and international destinations in Australia, South East Asia and the Western Pacific". The question is whether such objectives are best achieved through major investment in a low-volume, regional airport such as the Sunshine Coast Airport, or through better access to the major international hub at Brisbane Airport less than 100km away?
- d. Which industries, specifically, are considered likely to generate this international patronage, and why would potential visitors prefer to fly into the Sunshine Coast rather than Brisbane? What is the evidence used by the proponents to arrive at this assumption?
- e. From which international destinations will business visitors be departing for direct flights to the Sunshine Coast Airport. It is not apparent from the original EIS documents that any international destinations will be serviced, except for tourism flights to New Zealand and low cost carriers to unspecified Asian destination. Inputs for the models must be supplied. The economic assessment is critically dependent on the veracity of these inputs.
- f. Frequency of service, flexibility of schedules, price and availability of connections to other destinations are all

more important than direct flights for business travellers and leisure travellers. Were these factors considered in the business modelling, since Brisbane Airport will out-compete the Sunshine Coast on all international flights oriented to the business travellers?

- g. What proportion of visitors was expected to be business visitors, and how were these numbers determined?
- h. What is the evidence that the airport will contribute to the Coast's attractiveness as a place to work and live, as opposed to its current attractiveness? How was this quantified? Was it considered that the airport might detract from the attractiveness of the Sunshine Coast?
- i. Why include Noosa in this report? The ratepayers of Noosa will not be paying for this airport, and will not suffer the ecological, environmental and financial hazards experienced by the ratepayers of the Sunshine Coast.

### 3. General Comments:

- a. Council has stated, in responding to community concerns about dwellings newly affected by airport noise: *“Given the level of public exposure the new runway has received over many years, and the fact that the airport has been in its current location for over 50 years, property specific mitigation is not being considered.”* We believe that Council’s dismissal of any obligation to compensate owners of newly affected dwellings cannot be substantiated. Purchasers of dwellings are required to conduct due diligence but, in the case of airport noise, should not be required to look beyond ANEF information published in planning schemes. See **Attachment A** for a summary of measures adopted in Sydney and Adelaide to mitigate the effects of new runways on residents. The cost of these mitigation measures should be included in the SCAEP cost-benefit analysis.
- b. It is inconceivable that residents of districts south of Beerburrum would consider the Sunshine Coast airport

for air travel in place of Brisbane Airport. Based purely on distance and time, there is no advantage for any residents living south of Beerburrum to choose Sunshine Coast Airport over Brisbane Airport. When choice, flexibility, and price are also factored into decision-making, it seems reasonable to assume that the break-point will be much farther north, even for destinations served by both Brisbane and Sunshine Coast Airports.

- c. Why will new domestic air traffic be generated by a larger, more expensive airport? The CEOs of both Jetstar and Virgin have stated their concerns about the expansion project and the likely increased landing charges to defray the costs of the new build. The simple fact of building an airport cannot, of itself, lead to higher passenger numbers.
- d. It is important to recognise that at least a portion of the economic activity from any changes to the airport will be funded directly by the ratepayers of the Sunshine Coast. This funding would or could have been spent on other projects on the Sunshine Coast, and would therefore have delivered the same economic stimulus benefits in terms of industry and construction. Proposing all of the economic activity arising from airport construction as “added value” is therefore disingenuous.
- e. What will be the impact of an expanded Brisbane airport offering more flights, cheaper fares and better connections?
- f. Investment in high-speed transport infrastructure to Brisbane would likely deliver more benefits than a new airport runway, although these alternative options have not been modelled.
- g. The proposal to offset habitat loss at Mt Coolum National Park by plantings at Lower Mooloolah River (more than 10km distant from the airport site) is unacceptable. The rehabilitation of the LMRER is a

separate project that deserves to be undertaken on its own merits, but not as an offset for the destruction of Mt Coolum National Park.

4. “Appendix M provides an uncritical, overly optimistic account of the development of the Sunshine Coast as an educational, commercial and tourism hub of international standing. It lacks any realism about the threats to such growth, including:

- a downturn in China (more likely than not),
- competition with other tourism centres (both in Australia and internationally),
- competition for agri-business (with Toowoomba Wellcamp airport),
- downturn in the mining sector (as has already occurred to detrimental effect in Gladstone Airport),
- exchange rate changes,
- changes to the aviation industry
- and a host of other threats including international terror.

The only projections are for positive growth. Any credible assessment of the long-term economic viability must include provision for sensitivity analyses that assume some decline in some aspects of the drivers for the airport.

**Conclusion**

5. It is our submission that the expansion of the Sunshine Coast Airport is not in the public interest of the Sunshine Coast and is being driven by certain Councillors/businessmen well before its time. It would be a mistake to expand the Sunshine Coast Airport at this time and the ultimate cost of this mistake will be borne by the ratepayers of the Sunshine Coast in the first instance and the State in the second instance.



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President, Development Watch Inc.

30 November 2015

**ATTACHMENT "A"****EXTRACT FROM**

<http://www.infrastructure.gov.au/aviation/environmental/insulation/index.aspx>

**Sydney and Adelaide Noise Insulation Programs**

A noise insulation program was established in 1995 around Sydney Airport to ameliorate the impact of aircraft noise following the opening of the third runway. In 2000, an equivalent program was established in areas of high exposure around Adelaide Airport. Residential properties in the Australian Noise Exposure Forecast (ANEF) 30 contour and public buildings (schools, churches, day care centres and hospitals) in the ANEF 25 contour were eligible for assistance under the programs. All eligible residential properties have had the opportunity to be insulated under the programs, with one public building in Adelaide identified as eligible in 2013.

The Department continues to monitor aircraft noise contours that determine eligibility for insulation assistance around Sydney and Adelaide Airports.

The programs have been effective in reducing the impacts of aircraft noise on homes and public buildings under flight paths. At a combined cost in excess of \$470 million, the Adelaide and Sydney airport noise programs have insulated 4,083 homes and 99 public buildings in Sydney; while in Adelaide, a further 648 homes and 8 public buildings have been insulated.

**Home Owners Warranty****Building Work:**

Following completion of insulation work, owners had a 13 week defects liability period during which time they could notify their builder of any problems or defects. If problems have arisen outside of the defects period, you should initially contact the builder who performed the insulation work. If necessary you can seek the assistance of the Department of Fair Trading—NSW or The Office of Consumer and Business Affairs—SA.

**Air Conditioning:**

Air conditioning and ventilation systems installed under the program have a 5 year warranty plus free annual services for the same length of time. For problems with air conditioning, smoke alarms or relief fans, you should contact the service company for your air conditioner.

**Windows:**

All new windows installed as part of the insulation process are guaranteed by the manufacturer for 7 years. Either secondary windows or standalone acoustic windows would have been installed as part of an insulation package. Standalone acoustic windows are double glazed units which replace the existing windows in a house. If secondary windows were used they would have been installed either on the outside or the inside of the existing windows in a house. For problems with windows, you should contact the supplier of your windows.

**Ongoing Maintenance and Service Information:**

It is the responsibility of home owners to ensure that proper maintenance is carried out on their property and on the equipment and fittings used in their home, in accordance

with manufacturers' recommendations. Should problems arise with any products used to insulate your property you should in the first instance make contact with the appropriate supplier listed below:

#### Product Information

##### Sydney—Air Conditioning

Supplier	Service	Phone
DirectAir	Breakdown/Annual Service	(02) 4648 1611
Email (Coral Air)	Breakdown	(02) 9584 7210
Accent	Breakdown	(02) 8706 8400
Temperzone (formerly Bradway)	Breakdown	(02) 8822 5700

##### Sydney—Windows

Supplier	Phone
Wilkins Windows	(02) 9833 2993
Christoffel	(02) 9627 4811
Schuster	(02) 4822 3844
Wintite (Noise & Energy Control)	(02) 9838 0300
Noiseshield	(02) 9833 0855
Framex (James Hardie)	(02) 9882 1155
Soundbarrier	(02) 9540 4333
Aneeta	(02) 9939 0520

##### Adelaide—Air Conditioning

Supplier	Phone
Direct Air	(02) 4648 1611

##### Adelaide—Windows

Supplier	Phone
Statesman Windows	(08) 8345 1911
Rylock Windows	(08) 8355 2555
Wilkins Windows	(02) 9833 2993
Christoffel	(02) 9627 4811
Schuster	(02) 4822 3844
Noiseshield	(02) 9833 0855
Soundbarrier	(02) 9540 4333