



Department of Infrastructure, Transport, Regional Development,
Communications and the Arts
GPO Box 594
Canberra ACT 2601

By email: eis.submissions@infrastructure.gov.au

To whom it may concern,

Thank you for the opportunity to provide a submission regarding flight paths for Western Sydney International (WSI) and the draft Environmental Impact Statement (EIS).

The NSW Small Business Commissioner (the Commission) is an independent statutory office of the NSW Government. It provides strategic advice, advocacy and affordable dispute resolution services across NSW.

The Commission has received representations from aviation businesses concerned they will be adversely impacted by the flight path design for WSI, and consequently may be unable to continue operations from Bankstown Airport.

These businesses have also raised concerns regarding:

- Increased congestion and restrictions on the use of the airspace near Bankstown Airport.
- Critical safety issues in terms of how small aircraft and trainee pilots get in and out of the Airport.
- The fuel capacity of smaller aircraft limiting options for relocating pilot training further away.
- The additional fuel requirements for flying longer distances which would significantly increase costs (for example, it has been reported to the Commission that an additional 15-minute flying time to and from the airport will add 40 percent to the cost of obtaining a standard pilot's licence from Bankstown Airport).

The EIS Summary identifies that proposed flight paths will impact the airspace currently used by Bankstown and Camden airports for flying training, emergency services and other operations. The EIS Summary estimates the cost of this change, such as increased travel time to reach training flight space, at around \$15 million in 2026, which will increase at a rate of around one per cent per annum.

The EIS identifies continued consultation with aerodrome operators and airspace users at Bankstown and Camden Airports as a mitigation measure to minimise risks and associated economic costs.

While the overall social and economic benefit of WSI may outweigh costs for users of Bankstown and Camden airports, it is important for the EIS to consider the impact of the flight paths design on businesses in those airports and identify effective mitigation, including potential assistance for businesses that would need to relocate or consider alternative options.

Support initiatives may be warranted in circumstances where current users of surrounding airports made significant investments prior to changes to their operating conditions being reasonably foreseeable.

This could include capital equipment and structures which cannot be easily relocated, or long-term lease agreements. While these businesses may not have specific rights to the airspace or certain flight paths, the broader principle of equity should be considered given the potential for impacts to be concentrated.

Appropriate mitigation and support can reduce impacts, such that small businesses are not required to disproportionately carry the cost of the air space's redesign, without having the opportunity to receive any of the benefits of the new design or the developed WSI. For example, if the cost of accessing the training air space is lower from Camden Airport in comparison to Bankstown Airport, it may be appropriate to support Camden Airport to increase capacity to enable competitive opportunities for businesses currently located in Bankstown Airport. Alternatively, it may be more appropriate to provide subsidies or compensation to impacted businesses, including financial support for businesses facing higher costs owing to the airspace redesign.

In each case, the purpose of such assistance is to maximise public value by enabling WSI to operate efficiently, while working with affected stakeholders to mitigate any particularly onerous impacts, recognising that distributional impacts should form part of an assessment of costs and benefits.

Thank you for the opportunity to make a submission. If you require further information, please contact my Executive Officer Megan Bennett, at either megan.bennett@smallbusiness.nsw.gov.au or (02) 9372 8767.

Yours sincerely

Chris Lamont
Commissioner
NSW Small Business Commission

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