



**Newcastle™
Airport**

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To whom it may concern,

Re: AGL Energy Limited application for the Newcastle Power Station (SSI 9837), located at 1940 Pacific Highway, Tomago, NSW 2322, within the Port Stephens Council area.

Newcastle Airport Pty Limited (NAPL) wish to make comment on the proposed Newcastle Power Station (Power Station) located at Tomago.

Whilst NAPL is broadly supportive of the proposal, it is noted that the exhaust plume from the facility is predicted to penetrate both the OLS and the PANS-OPS. The potential to impact on airspace adjacent to an aerodrome is a significant matter in respect of public safety and therefore should be mitigated as far as is reasonably practicable.

NAPL would therefore request that the impact of the facility be minimised through the use of the Reciprocating Engine option as this will provide the smallest penetrations into active airspace and thus minimise impact on aviation. Further it is requested that AGL commit to working with NAPL, RAAF and other aviation industry participants in respect of the installation of Required Navigation Performance Approach system (RNP AR), this would allow for higher precision approaches and thus better use of airspace to avoid the impacted area.

Once appropriate additional mitigations are installed then an appropriate risk assessment should be undertaken to ensure that risk to public safety is appropriately controlled.

The justification for this position is:

- > Both options penetrate the OLS and PANS-OPS Surface at a dangerous vertical velocity.
- > The Reciprocating Engine option poses less of a risk to aircraft that enter the planned restricted airspace. The reduced risk for the Reciprocating Engine Option is derived from its exhaust plume dissipating and falling to an acceptable velocity at a lower height compared to the Gas Turbine.
- > Having a restricted airspace that activates and deactivates is not viable with either option due to the unpredictability of power demand. As such, a permanent solution is the only viable option. The most effective permanent mitigation is the introduction of RNP AR for Williamtown.
- > The Gas Turbine option has the detriment that it would require the 10NM Minimum Sector Altitude be increased by 300 feet to 2400 feet and this would have an impact on Civil and Military Operations.

NAPL operate in accordance with an Operating Deed (the Deed) with the Department of Defence (DoD) with a 60-year head lease. The Deed allows for hours of operation between 0600 and 2200 every day of the year.

The current operating environment has peak periods between the hours of 0600 and 1100 in the morning; 1230 and 1500 in the afternoon; and 1800 and 2200 in the evening.

It is NAPL's understanding that with the introduction of the Power Station there will not be predicted timeframes of operation and little notice (up to 5 minutes) of the Power Station starting up. It is also our understanding that the times and periods of the year that the Power Station would be most active is in the warmer months (October through March) and at times of the day, later in the afternoon (after 1700) when the power requirements are at peak periods.

These timeframes coincide with NAPL operations and as such have the potential to cause operational, economic and reputational impacts to our business.

RNP AR procedures allow for precision of flight paths with high level accuracy and integrity of aircraft. RNP also offers significant safety benefits including low approach minimums in challenging terrain, shorter path length, lower fuel consumption and less noise in populated areas. RNP AR also provides greater confidence to Air Traffic Control on the tracking performance of aircraft.

The introduction of the Power Station within the OLS provides risk to aircraft landing during times the Power Station is in operation. RNP AR would provide a permanent mitigation to this risk for a range of aircraft. NAPL believe that if the development is approved within the OLS, the costs associated with risk mitigation is partially attributable to AGL as the developer.

Ultimately, the Power Station has the potential to disrupt Regular Public Transport (RPT) operations. Summary of impacts are:

- > Aircraft conducting visual approaches at night are not allowed to descend below the MSA (Minimum Sector Altitude) until they are in the circling area (4.2NM or closer, depending on aircraft type). The additional 300ft will result in them having to either track further in the circling area to descend or adopt a higher rate of descent.
- > 2100ft coincides with the noise abatement altitude and increasing MSA will create a disconnect between the two. This elevates the risk of error from a controller manoeuvring an aircraft below MSA.
- > If the cloud base sits in the marginal band (between 2100ft and 2400ft) it will be more difficult for arriving aircraft (particularly during CTAF or periods of no radar) to get visual (without instrument approach).
- > Departing aircraft, in some circumstances, will need to climb the additional 300ft before being able to track to their first waypoint.

In conclusion, NAPL support the Power Station development based on the Reciprocating Turbine Engine option and a permanent mitigation of RNP AR, with a financial contribution from AGL. This is due to the safety of aircraft and unpredictability of Power Station operations.

NAPL is the second largest airport in NSW with passenger numbers currently at 1.28million. This number is projected to grow to circa 3.5 million by 2026. The disruption and challenges to operations which the introduction of this development would present will clearly be magnified if passenger forecasts are met and permanent mitigations are not introduced.

Yours Sincerely



Melissa Rowe

Executive Manager Operations and Compliance