



MACROC Submission on the Western Sydney Airport Draft Environmental Impact Statement for the Western Sydney Airport

Thank you for the opportunity to comment on the Draft Environmental Impact Statement for the Western Sydney Airport.

MACROC is the regional organisation of councils for the Macarthur area of South West Sydney. Formed in 1985, it represents the local government areas of Camden, Campbelltown and Wollondilly. MACROC's role is to identify issues of regional importance and advocate for positive regional outcomes. Regional issues for the Macarthur region include transport infrastructure planning, managing population growth, employment generation, economic development and land use planning. As the Government is aware South West Sydney is the area targeted to accommodate the major proportion of Sydney's projected growth over the coming years.

On 15 April 2014 the Federal Cabinet supported the establishment of a second airport in the Sydney Basin, to be located at Badgery's Creek. As the proposal has significant impact on matters of national environmental significance and other matters protected under Part 3 of the EPBC Act, the impacts of the proposal have been assessed by an Environmental Impact Statement.

Given that the consultation period for such a complex document was predicted to be only 60 days a group of Western Sydney Councils, including the MACROC Councils, decided that Councils could best assess the Draft Environmental Impact Statement by employing a team of expert consultants to prepare an independent peer review of the Western Sydney Airport Environmental Impact Statement. This allowed our Councils to access expert advice and to use that information to prepare their individual submissions to the Commonwealth.

The review was funded by 11 councils across Greater Western Sydney and conducted by WSP Parsons Brinckerhoff in collaboration with a number of specialist consultants.

The review looked at nine key issues identified by participating councils as key to the success of an airport at Badgerys Creek. These included:

- Noise
- Air quality and greenhouse gases
- Traffic, transport and access
- Human health
- Aviation planning
- Social and economic impacts
- Surface water and groundwater
- Greater Blue Mountains impacts
- Biodiversity

The proposed Western Sydney Airport project will be one of the largest and most complex infrastructure projects in Australia. The project as proposed in the Draft Environmental Impact Statement (EIS) is intended as a staged development. The Draft EIS and its associated 'Airport Plan' considers an initial single-runway development capable of handling up to 185,000 aircraft movements (37 million passengers per annum) nominally by around 2050, following which a dual runway is proposed with a total theoretical maximum capacity of 370,000 aircraft movements per year (82 million passengers) assumed to be reached in 2063.

The Draft EIS provides a broad assessment of the eventual two-runway development, but acknowledges that given the long time horizon to full development, more detailed assessment will be required to fully understand the impacts of the project at that time.

The Draft EIS also recognises that there is currently no operator nominated for the construction and operation of the airport, and as such the Airport Plan is considered to be a transitional document. This creates some uncertainties for the Draft EIS, which acknowledges that key aspects of the Draft EIS are effectively indicative only.

It is understood that the Draft EIS was prepared over a period of approximately 8 months from engagement of EIS consultants to provision of an initial draft to the Commonwealth Department of Environment for review. The Review of the Western Sydney Airport Draft Environmental Impact Statement (WSP Parsons Brinckerhoff. 25 November 2015. Attachments A and B) identifies that this time constraint has resulted in a number of omissions and limitations within the Draft EIS.

There are a number of areas of concern with the Draft EIS, one of the most important being the apparent lack of detail and certainty around airspace planning (or 'airspace architecture'). Other key concerns relate to the decision to define Phase 1 (i.e. the scenario for which the EIS seeks approval) as the level of operational activity at 2030. This results in an assessment of a level of airport activity well below the theoretical maximum capacity that the initial single runway development could accommodate (63,000 air movements annually, compared to a theoretical maximum of 185,000).

Other issues relate to the high level traffic assessment, the adequacy of the health impact assessment and the uncertainty over the longer term development of the airport.

The following are some of the key issues raised by the specialists engaged to peer review the Draft Environmental Impact Statement.

Noise (Airport ground-based and vibration):

- The type and magnitude of impact, pre and post mitigation has not been included.
- A single rating background level has been assumed for all receptors and this generalisation has underestimated the magnitude of noise impacts at receptors located close to the airport.
- Luddenham sensitive receptors were not included in background noise monitoring.
- No cumulative noise impact assessment has been considered.

Airspace Architecture (Flight paths):

The Review of the Western Sydney Airport Draft Environmental Impact Statement highlights a range of concerns with regard to the flight paths presented in the Draft EIS:

- The Draft EIS makes clear that the flight paths have not been designed to minimise environmental (and in particular noise) impacts on communities.
- They have taken no account of the smaller airports (Camden, Richmond, Bankstown), other than to note that these would be impacted in the long term.
- There is no explanation in the Draft EIS of how these contours were arrived at, and how they compare to alternatives considered.
- The contours are 'proof of concept' – in other words they are indicative only, and could be revised by a future ALC without recourse to the EPBC Act. As such there is considerable uncertainty over what actual impacts may eventuate.
- There is no real explanation in draft EIS of how flight paths were determined.

Surface Transport and Access

- No traffic intersection modelling has been undertaken.
- The Draft EIS does not consider an assessment of rail.
- The traffic estimate is based on 2011 which may be an underestimate as it does not include recent land use developments.

Human Health

- No rationale or justification has been given as to why a Health Risk Assessment (HRA) has been undertaken rather than a Health Impact Assessment (HIA).
- Perceived health issues not considered.
- Social determinants of health have not been considered.
- Long term cumulative impacts on health have not been considered.

Social Impact

- Although there is a strong focus on the discussion economic benefits arising from the Western Sydney Airport, there is no substantive or balanced discussion of the social impacts (costs and benefits) of the airport.
- There appears to be a strong focus on regional benefits rather than on local impacts.
- Many potential issues are stated with little assessment of their implications or level of significance or duration.
- Claims being made by Commonwealth about economic generation and job creation do not appear to have been explicitly tested in the draft EIS.
- The draft EIS does not describe the economic or social impacts of any transfer of activity from other areas in Sydney or Australia.

The Review of the Western Sydney Airport Draft Environmental Impact Statement, November 2015, prepared by WSP Parsons Brinckerhoff, provides a detailed analysis of the Western Sydney Airport Draft Environmental Impact Statement. MACROC considers the issues identified in this document should be considered by the Minister and suggests that additional work needs to be undertaken in these areas so that the residents of the Macarthur Region can be assured of the best possible sustainable outcomes for the environment of the region, as well as the best sustainable outcomes in terms of economic growth and access to employment opportunities.

In their individual submissions the MACROC Councils have identified in detail the issues in the Western Sydney Airport Draft Environmental Impact Statement that they consider will have relevance to the residents of their LGA. This regional submission should be read in conjunction with the submissions made by our Member Councils.

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