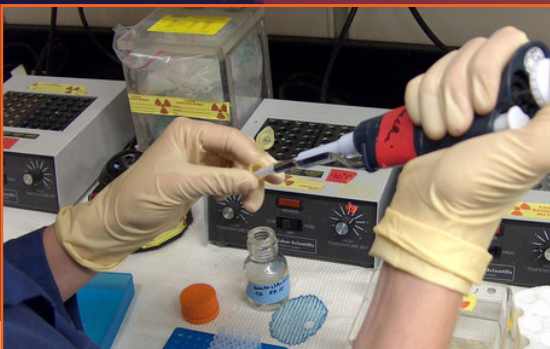


PENRITH



WESTERN SYDNEY AIRPORT

Draft Airport Plan and Draft
Environmental Impact Statement

SUBMISSION - DECEMBER 2015

PENRITH
CITY COUNCIL

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Executive summary

The proposed Western Sydney Airport (WSA) will be one of the largest and most complex infrastructure projects in Australia.

Council's position in conditionally accepting the Federal Government's decision to build the airport at Badgerys Creek recognises the great potential it offers as a catalyst for increased infrastructure, jobs and investment in our City and the Western Sydney region. Council, however, believes there is still considerable work to be done to ensure the WSA maximises its benefits and minimises its impacts on Penrith and the region. Our submission highlights that many important issues have been minimally or inadequately addressed in the draft Environmental Impact Statement (EIS). Nevertheless, we believe that with good will and good process the vast majority of the areas of concern can be resolved and managed.

Specifically, Council's view is that there must be a more equitable distribution of the noise impacts of aircraft movements. In this regard, consideration must be given to alternative flight paths and merge points, noise sharing to limit noise exposure for any single community and changes to the Sydney Airports Curfew Act to ensure it applies to both Sydney's Kingsford Smith Airport (KSA) and the WSA. There must be full and effective integration of the airspace in the Sydney Basin for the shared operations of KSA and the WSA. Important transport connections and supporting infrastructure must be in place before the opening of the WSA, particularly rail from the airport to the Main Western line. In addition, special arrangements or mechanisms must be established, involving all levels of government to develop and deliver a decades-long, funded program of infrastructure for the WSA. If there are planning and land use implications affecting the economic potential of the Western Sydney Priority Growth Area, economic offset arrangements must also be established by the Federal Government for Western Sydney. Importantly, all economic, social and environmental benefits and impacts must be fully addressed in the EIS and proposed mitigation measures detailed in any approval to ensure the health and wellbeing of our community is maintained.

Council is committed to working with the Federal Government to deliver a WSA that fully integrates with Western Sydney and delivers maximum benefits to the region in terms of transport and infrastructure provision, employment and economic development.

We are concerned and disappointed by the Federal Government's refusal to extend the exhibition period for the draft Airport Plan and draft EIS, despite repeated requests from Council and other stakeholders. Allowing only 60 days to assess and respond appropriately to the documents is insufficient, given the level of detail and technical complexity, and the potential impacts the WSA will have on our community. Understanding the actual extent of those impacts has been made more difficult by the draft EIS, which is based on conceptual airspace architecture and an airport development for only the first five years of operation.

Council seeks assurances the community and stakeholders will be effectively consulted and engaged in all subsequent key processes and decisions on the future growth and development of the WSA. We request the final EIS detail the subsequent assessment and approvals processes once the Airport Lessee Company is appointed, including the level of community and stakeholder engagement that would be undertaken.

Council's submission outlines 28 key recommendations, 27 recommendations on other issues and two recommendations on ongoing consultation, which are supported by detailed discussion. Council requests that the final EIS, forwarded to the Minister for the Environment, reflect these recommendations.

The key recommendations and those relating to consultation are reproduced below:

Key recommendations

1. The final EIS address the issues identified by the independent peer review.
2. To assess the actual environmental impacts of the proposed Western Sydney Airport, the final EIS be based on the extent of development and operational activity at 2050, when the single runway reaches its capacity.
3. All feasible alternative flight paths and particularly alternative locations for merge points be assessed to minimise environmental impacts and provide a more equitable distribution of noise impacts.
4. All feasible alternative flight paths and merge points be assessed to take account of all airports within the Sydney Basin, including Sydney's Kingsford Smith Airport.
5. A Sydney Basin airspace management plan be developed to ensure the full and effective integration and optimisation of airspace in the Sydney Basin for the shared operations of Sydney's Kingsford Smith Airport and the Western Sydney Airport. The airspace management plan should outline 'airspace architecture' in incremental stages – 5 years (2030), 10 years (2035) and 25 years (2050).
6. A strategy be prepared for the timely relocation of the general aviation activities at Camden and Bankstown Airports, if they are exerting pressure on Sydney's airspace load, and for the modification of the Richmond RAAF Base airspace.
7. The detailed design process for determining airspace architecture be clearly explained in the final EIS, including the process for assessing subsequent environmental impacts, particularly noise, and the process for community and stakeholder engagement.
8. Mitigation and management measures include limits on environmental impacts, including noise, to provide greater certainty to the community and stakeholders.
9. The purpose and use of the Western Sydney Airport be more clearly defined to understand how the airport will operate, the peak periods of activity and the type of aircraft traffic that will use the airport. Clarity must also be provided on the relationship of the Western Sydney Airport to Sydney's Kingsford Smith Airport.
10. The forecasts for passenger loads per aircraft and passenger throughput per aircraft stand be justified as these forecasts potentially understate the number of aircraft movements and, in turn, likely noise impacts.
11. The forecasts for total passenger numbers from 2030 through to 2063 be tested and justified.
12. Runway separation be justified.
13. A more equitable distribution of the noise impacts of aircraft movements be determined including, but not limited to:
 - a. Consideration of alternative flight paths and particularly alternative locations for the merge point for arrivals;
 - b. Limits to noise exposure for any single community; i.e. noise sharing beyond the communities of Penrith, Blue Mountains and Blacktown; and
 - c. Amendment to the Sydney Airport Curfew Act 1995 to become the Sydney Airports Curfew Act and apply to both KSA and the future WSA.
14. The significance of impacts relating to community annoyance be quantified.
15. Sensitivity testing be presented to demonstrate changes in noise impacts resulting from modification of flight paths through subsequent processes.

16. Economic offset arrangements be established by the Federal Government for Western Sydney if there are planning and land use implications of the proposed Western Sydney Airport on the economic potential of the Western Sydney Priority Growth Area.
17. A passenger rail line from the Western Sydney Airport to the Main Western line be in place before the opening of the airport.
18. Special arrangements or mechanisms be established, involving Federal, State and local governments to develop and deliver a decades-long, funded program of infrastructure for the Western Sydney Airport, including the upgrades in the Western Sydney Infrastructure Plan.
19. The final EIS include detailed traffic intersection modelling, assessment of traffic generated from all uses on the Western Sydney Airport site, assessment of impacts on public transport operations and consideration of the Outer Sydney Orbital.
20. Mamre and Luddenham Roads be widened to four lanes to support the Stage 1 (2030) development of the Western Sydney Airport.
21. In collaboration with the NSW Department of Planning and Environment and Transport for NSW, the traffic and transport modelling be extended to include the impacts of, and infrastructure requirements to cater for, both the Stage 1 and long term developments and the ultimate level of development anticipated within the Western Sydney Priority Growth Area.
22. The final EIS provide greater clarity on the expected economic uplift and job creation potential of the Western Sydney Airport, including likely future sectors that support and flow from the airport.
23. The final EIS provide a more balanced discussion of the economic and social costs and benefits of the Western Sydney Airport, including their spatial spread.
24. The final EIS include a cost-benefit analysis of the Western Sydney Airport with a curfew.
25. The final EIS include discussion on the economic impacts of not having a rail link from the opening of the Western Sydney Airport and on the needs of the expected target markets.
26. The final EIS provide clarity on the proposed use of the National Airports Safeguarding Framework and the implications of the Western Sydney Airport on planning controls, including the planning framework for the Western Sydney Priority Growth Area, at various stages of development of the airport – 5 years (2030), 10 years (2035), 25 years (2050) and full development (2063).
27. The Obstacle Limitation Surfaces framework that currently applies in the Sydney Basin be extended to include the operations of the Western Sydney Airport to provide strategic guidance to councils in Western Sydney in considering proposals for rezoning and development in relation to building heights. Particular reference should be provided for future development in the Penrith City Centre, St Marys Town Centre and Western Sydney Priority Growth Area.
28. Federal Government commit to work directly with the NSW Government and Penrith and Liverpool City Councils in the planning for the Western Sydney Priority Growth Area to identify structural, sectoral and land use planning frameworks for future development to support the Western Sydney Airport.

Recommendations on ongoing consultation

56. The community and stakeholders be effectively consulted and engaged in all subsequent key processes and decisions on the future growth and development of the Western Sydney Airport.

57. The final EIS detail the subsequent assessment and approvals processes once the Airport Lessee Company is appointed, including the level of community and stakeholder engagement that would be undertaken.

Introduction

In May of this year, Penrith City Council resolved to accept the Federal Government's decision to build the Western Sydney Airport (WSA) at Badgerys Creek, recognising that the WSA offers great potential as a catalyst for increased infrastructure, jobs and investment in our City and the Western Sydney region. This decision, however, was taken subject to a number of preconditions, including amending the Sydney Airport Curfew Act 1995 so that it applies to both Sydney's Kingsford Smith Airport (KSA) and the future WSA; requiring both airports to operate as one system; and providing rail from the WSA to the Main Western line before the airport commences operations. Correspondence was sent to the Federal Department of Infrastructure and Regional Development (DI&RD) on 15 June 2015 advising of Council's decision and seeking to work more proactively with the Federal and State Governments to ensure the WSA and associated infrastructure bring maximum benefits and uplift to Penrith and Western Sydney.

Council's document *Western Sydney Airport – Maximising Benefits Minimising Impacts* has also been developed and provided to the DI&RD. This document specifically outlines what Council is asking for in relation to the WSA at Badgerys Creek:

- The ability to influence the planning of the WSA and surrounding areas on behalf of our community;
- Vital transport connections and supporting infrastructure - both rail and road - being in place before the opening of the WSA;
- Environmental and social impacts being addressed in the Environmental Impact Statement (EIS) and managed in any approvals to ensure the health and wellbeing of our community is maintained;
- The noise impacts on our community being minimised, including amending the Sydney Airport Curfew Act;
- The WSA being the catalyst to create the number and type of jobs our community wants and to drive economic development in Western Sydney;
- Centres for learning, education and research being established in Western Sydney to equip our community with the skills they need to aim high and succeed in jobs of the future; and
- The WSA being an iconic site that delivers world's best practice in access, employment and technology.

While this submission is in response to the proposed WSA detailed in the draft Airport Plan and draft EIS, Council maintains the preconditions listed above are crucial to the success of any airport at Badgerys Creek, particularly in terms of how well it integrates and connects to Western Sydney and minimises its impacts on the communities and environment of our City and the region.

This submission confirms, expands on and identifies additional preconditions based on the detailed information in the draft Airport Plan and draft EIS. In particular, Council firmly believes there must be a more equitable distribution of aircraft noise impacts; integration of airspace in the Sydney Basin for the shared operations of KSA and the WSA; vital transport connections before the opening of the WSA, particularly rail; economic offsets if there are planning and land use implications affecting the economic potential of the Western Sydney Priority Growth Area; and special arrangements or mechanisms involving all levels of government to deliver necessary infrastructure for the WSA. Council also firmly believes all economic, social and environmental benefits and impacts must be fully addressed in the EIS

and proposed mitigation measures detailed in any approval to ensure the health and wellbeing of our community is maintained.

Council is committed to continuing to work with the Federal Government to deliver a WSA that is fully and effectively integrated with Western Sydney and delivers maximum benefits to the region in terms of transport and infrastructure provision, employment and economic development.

To help prepare its submission, Council was one of eleven Western Sydney councils to contribute to an independent peer review of the draft Airport Plan and draft EIS by specialist consultants appointed by the Western Sydney Regional Organisation of Councils (WSROC) in partnership with the Macarthur Regional Organisation of Councils (MACROC). This peer review has been critical in helping to better understand the airport proposal and its environmental consequences in the limited time available, notwithstanding the inadequacies of the draft EIS. Council notes that a copy of the peer review report has been provided to the DI&RD by WSROC. The peer review report is also available at <https://www.penrithcity.nsw.gov.au/airport/>.

Council's submission provides comments on a range of issues including, but not limited to, the relationship between the WSA and KSA; aircraft noise and the impact on Penrith's communities; traffic and transport; economy and jobs; and potential impacts on the Western Sydney Priority Growth Area.

Adequacy of the draft EIS

Information gaps

The *Guidelines for the Content of a Draft Environmental Impact Statement for Western Sydney Airport* (EIS Guidelines), issued by the Department of the Environment (DoE) on 29 January 2015 under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act), require “information about the action (i.e. the construction and operation of the WSA) and its relevant impacts” to be provided in the EIS “sufficient to allow the Minister to make an informed decision on whether or not to approve ... the taking of the action”. The EIS Guidelines also state “the EIS should enable interested stakeholders and the Minister (for the Environment) to understand the environmental consequences of the proposed development”.

The peer review indicates the draft EIS has “a number of omissions and limitations”. These relate to the description of the proposal and the consideration of alternatives, particularly in terms of airspace architecture and aviation planning; aircraft noise; ground noise; air quality; human health risks; impacts on the Greater Blue Mountains World Heritage Area (GBMWSHA); biodiversity; traffic and transport; economic and social impacts; planning and land use; cumulative impacts and mitigation measures. These are discussed later in this submission and are detailed in the peer review report. It is considered the draft EIS does not meet the requirements of the EIS Guidelines and brings into question its overall adequacy. Council maintains its view that all economic, social and environmental benefits and impacts must be comprehensively addressed in the final EIS to understand the full implications of the WSA.

Recommendation:

1. The final EIS address the issues identified by the independent peer review.

Limited scope of Stage 1 development

One of the significant limitations of the draft EIS is the adoption of the Stage 1 (2030) development as the primary assessment scenario for seeking approval for a major international airport. The level of operational activity at 2030 is well below the theoretical maximum that the proposed single runway could accommodate at 2050. At 2030, 10 million passengers or about 63,000 air traffic movements are forecast annually, compared with 37 million passengers or about 185,000 air traffic movements annually at 2050.

Given the 2030 development scenario underpins the entire assessment for the Stage 1 development in the draft EIS, the likely impacts of the WSA will be significantly understated. Council supports the concern of the peer review and the need for the final EIS to be based on the 2050 development scenario, when the single runway reaches its capacity.

Recommendation:

2. To assess the actual environmental impacts of the proposed Western Sydney Airport, the final EIS be based on the extent of development and operational activity at 2050, when the single runway reaches its capacity.

Inadequate assessment of airspace architecture

Another limitation of the draft EIS is the assessment of airspace architecture, which is only conceptual and does not consider feasible alternatives, including alternatives that allow Sydney's airspace to be used as one system by both KSA and the WSA.

The flight paths and merge points presented in the draft EIS are a 'proof of concept' and, as such, are indicative only. The draft EIS makes it clear that they were determined based solely on operational and aviation safety considerations, and that minimising environmental impacts, particularly noise impacts, was not a consideration. Given they underpin the assessment of many of the issues throughout the draft EIS, including aircraft noise and air quality, there is a high degree of uncertainty around their likely environmental impacts.

Further, only one set of flight paths and one merge point have been assessed for the Stage 1 (2030) development. This does not meet the requirement in the EIS Guidelines to assess feasible alternatives and make clear why an alternative is preferred to another. Other than a statement that the indicative flight paths and merge point have been developed to allow KSA to operate independently of the WSA in 2030 and to ensure safety of operations, there is no discussion in the draft EIS on why the flight paths and merge point have been chosen. This is confirmed by the peer review, which states "we cannot comment on whether the flight paths nominated may in fact be the best outcome ... the key issue is lack of transparency around the nominated flight paths". The rationale for the indicative flight paths and merge point for the Stage 1 development is also unclear, given they do not coincide with those for the long term development.

The peer review highlights that the flight paths and merge points take no account of other smaller airports in the Sydney Basin (Camden, Bankstown and Richmond) other than to note that these would be impacted in the long term and recommends a holistic review of flight paths, taking account of all airports in the Sydney Basin, including KSA, should be undertaken. Council strongly supports this recommendation and the need to fully and effectively integrate airspace in the Sydney Basin for the shared operations of KSA and the WSA. Council also recommends a strategy be prepared for the timely relocation of the general aviation activities at Camden and Bankstown Airports, if they are exerting pressure on Sydney's airspace load, and for the modification of the airspace for Richmond RAAF Base.

In addition, the peer review identifies the lack of consideration of any scenarios beyond the normal/scheduled operation of the WSA, such as queuing in the event of unscheduled interruption.

The draft EIS notes the airspace architecture will be "progressively refined during a detailed design process which would provide the opportunity to optimise safety, efficiency, noise and environmental impacts before operations begin at the proposed airport". The draft EIS, however, is not clear on this process, except to say that it "may require further environmental assessment processes to assist decision making and may be the subject of a future referral under the EPBC Act following detailed design". It is also unclear if a future referral under the EPBC Act would be required for a change in flight paths. The *Airports Act 1996* (Airports Act) notes that this can be assessed under a major development plan, which would not need approval from the Minister for the Environment. The Minister for Infrastructure and Regional Development would only need to obtain and consider advice from the Minister for the Environment. Council considers the detailed design process for determining airspace architecture should be clearly explained in the final EIS, including the process for assessing subsequent environmental impacts, particularly noise, and the process for community and stakeholder engagement.

Recommendations:

3. All feasible alternative flight paths and particularly alternative locations for merge points be assessed to minimise environmental impacts and provide a more equitable distribution of noise impacts.
4. All feasible alternative flight paths and merge points be assessed to take account of all airports within the Sydney Basin, including Sydney's Kingsford Smith Airport.
5. A Sydney Basin airspace management plan be developed to ensure the full and effective integration and optimisation of airspace in the Sydney Basin for the shared operations of Sydney's Kingsford Smith Airport and the Western Sydney Airport. The airspace management plan should outline 'airspace architecture' in incremental stages – 5 years (2030), 10 years (2035) and 25 years (2050).
6. A strategy be prepared for the timely relocation of the general aviation activities at Camden and Bankstown Airports, if they are exerting pressure on Sydney's airspace load, and for the modification of the Richmond RAAF Base airspace.
7. The detailed design process for determining airspace architecture be clearly explained in the final EIS, including the process for assessing subsequent environmental impacts, particularly noise, and the process for community and stakeholder engagement.

Generic management and mitigation measures

The draft EIS provides a range of management and mitigation measures for the Stage 1 (2030) development of the WSA. A common concern amongst all specialist consultants involved in the peer review was that mitigation measures are generic in nature, primarily because of the uncertainty of the likely impacts of the WSA.

The peer review states "in a number of areas, the EIS ... does not set hard limits on environmental impacts. In the case of aircraft noise, this is a reflection of the nature in which aircraft noise is managed in Australia ... However, the same is also largely true of other aspects of the draft EIS – the mitigation measures are generally not prescriptive, and there is little in the way of hard limits on impacts ... this creates uncertainty over the likely future impacts". Council supports the need for mitigation measures to include limits on environmental impacts, including noise, to provide greater certainty to the community and stakeholders.

The peer review also found the effectiveness of mitigation measures is generally not quantified. The type and magnitude of impacts pre and post mitigation is often not described. For example, a key mitigation measure for aircraft noise is the insulation of existing dwellings. However, the draft EIS provides no details on the circumstances in which this measure would be implemented.

In relation to the long term development of the WSA, the management and mitigation measures are generally not known. Management of the WSA beyond 2030 will be described in the Environment Strategy prepared by the Airport Lessee Company in accordance with the Airports Act. The peer review states "the Environment Strategy is not likely to require the same level of scrutiny or approval by (the) Minister for the Environment as ... the works described under Stage 1". The peer review recommends the EIS be based on the level of development and operational activity at 2050, when the single runway reaches full capacity (i.e. recommendation 2), so longer term management and mitigation measures can be detailed. This would provide greater certainty to the community and key stakeholders.

Recommendation:

8. Mitigation and management measures include limits on environmental impacts, including noise, to provide greater certainty to the community and stakeholders.

Note: Recommendation 2 is also relevant.

Key Issues

Aviation planning

In terms of aviation planning, the peer review identified a lack of clarity on the purpose and role of the WSA, which creates uncertainty in terms of the likely environmental impacts of the airport.

The peer review identifies there is “no vocation or aviation purpose” described for the WSA. The peer review suggests that, in its early stages of development, it is expected that the WSA would be a predominantly domestic, low-cost carrier airport with a significant cargo operation. The draft Airport Plan confirms this stating that, in the early years, around 80% of passenger demand is expected to be for domestic travel. Premium international flights would therefore continue to use KSA as the primary airport in NSW and the one which provides proximity to the tourist and business centre of the Sydney CBD. This vocational aspect is important in influencing how the WSA will operate, the peak periods of activity and the type of aircraft traffic that will use the WSA.

Further, the peer review suggests the forecast passenger loads per aircraft for the WSA, as presented in the draft EIS, appear to be high. Passenger loads are forecast to be about 160 passengers in 2030 rising to 220 passengers in 2063. However, current passenger loads through KSA average 126 passengers. For Melbourne and Brisbane Airports, the current passenger loads average 143 and 110 passengers, respectively. The peer review states “these airports are mature, with well-defined markets and a reasonable share of international traffic. It therefore seems optimistic ... to expect higher average passenger loads per aircraft movement than these three airports in the 5 years after it opens”. There is potential the forecasts understate the number of aircraft movements required, which subsequently impacts dependent analysis, such as noise modelling and planning for landside infrastructure. Similarly, benchmarking indicates passenger throughput per aircraft stand is potentially high for the WSA. This would imply the number of aircraft stands shown is less than one might typically expect.

It is unclear what benchmarks or planning decisions underlie the 1.9km runway separation. The peer review notes other airports in Australasia are proposing wider runway separation, typically between 2.0km and 2.5km. Whilst the second runway is not part of the Stage 1 (2030) development for which approval is being sought, its future location does influence the layout of other aviation uses on the site. The peer review also highlights there is no consideration of alternative runway orientations – a key determinant of flight paths - in contrast to the 1997 draft EIS which examined a number of alignments.

There is no discussion on the WSA’s relationship to the ongoing operation of KSA. The peer review, in particular, notes the potential long term growth forecast for the WSA (82 million passengers annually by 2063) is very high. The peer review also notes the growth between 2050 and 2063 is extremely high – 45 million annual passengers in 13 years, which is unprecedented. These statements suggest the role of the WSA and its relationship with KSA is likely to change rapidly. Accordingly, as previously suggested, Council believes the adoption of the Stage 1 (2030) development as the primary assessment scenario for seeking approval for the WSA is inappropriate. The final EIS should be based on the level of development and operational activity at 2050, when the single runway reaches full capacity (i.e. recommendation 2). Further, given the potential for rapid change, Council believes it is important to develop a Sydney Basin airspace management plan at the outset for the shared operations of KSA and the WSA (i.e. recommendation 5).

Recommendations:

9. The purpose and use of the Western Sydney Airport be more clearly defined to understand how the airport will operate, the peak periods of activity and the type of aircraft traffic that will use the airport. Clarity must also be provided on the relationship of the Western Sydney Airport to Sydney's Kingsford Smith Airport.
10. The forecasts for passenger loads per aircraft and passenger throughput per aircraft stand be justified as these forecasts potentially understate the number of aircraft movements and, in turn, likely noise impacts.
11. The forecasts for total passenger numbers from 2030 through to 2063 be tested and justified.
12. Runway separation be justified.

Note: Recommendations 2 and 5 are also relevant.

Aircraft noise

The operations of the WSA will result in significant noise impacts for Penrith City during both day and night if the proposal proceeds as presented in the draft EIS.

The indicative flight paths and merge points, airport operating modes, projected air traffic volumes and different aircraft types have been incorporated into the modelling for the draft EIS to establish the level of noise impact. Consequently, any changes to these parameters will result in changes to noise impacts.

As previously highlighted, the draft EIS does not provide a final design for flight paths and merge points, only a proof of concept. This conceptual design is based solely on operational and safety considerations, without any consideration of noise impacts. This means that the level of noise impact experienced by different suburbs may change as the detailed design process occurs. As noted in the peer review, the draft EIS “does not provide any indication of the manner or extent to which the final airspace design may vary”, and “this represents a significant source of uncertainty” in terms of noise impacts. To address this uncertainty, Council believes the final EIS must consider the changes to noise levels from various flight paths, for example, by providing noise levels for a range of alternative flight paths and merge points or through a sensitivity analysis including the likely population to be affected.

It is noted the adoption of the point merge system for arrivals was chosen for a number of reasons, including its potential to reduce noise impacts as it relies on a continuous decent path, which requires limited use of aircraft engines. However, because this results in certain populations always being exposed to aircraft movements, the system results in the largest implications for one area – the Penrith LGA. At present, the noise assessment is based on a merge point located over Blaxland, with aircraft travelling east over Penrith, through Kingswood, Werrington and St Marys, and down through Kemps Creek to arrive at the airport when the mode 23 operational strategy is in use. Two other merge points for the Stage 1 development, however, have been shown in the Wilkinson Murray technical report supporting the draft EIS. Notwithstanding this, there is limited discussion of these or other alternative merge points. Council firmly believes alternative merge points must be assessed in the final EIS to determine a more equitable distribution of noise impacts. There is also limited discussion of the use of any alternative arrival system.

In addition, the indicative merge point shown in the draft EIS for the Stage 1 development is substantially different to those for the long term development. The merge points and associated arrival flight paths for the long term development for the most part appear to be

outside Penrith City. Departure flight paths appear to be heading in similar directions to the Stage 1 development with the exception of the '05' option which runs very close to the southern fringe of Glenmore Park, a concern for likely additional noise impacts on this residential area.

Of the three operating modes assessed in the draft EIS, each has the potential to impact the residents of Penrith City in different ways:

- For mode '05', where aircraft arrive from the south-west and depart to the north-east, there will be greater impacts on residents to the north-east of the WSA.
- For mode '23', where aircraft arrive from the north-east and depart to the south-west, less people will be impacted within Penrith City, however, those areas affected are likely to experience higher numbers of aircraft noise events.
- For mode 'Head-to-head', where all landings and take-off movements occur in opposing directions, to and from the south-west and only at night, noise events will be substantially reduced at night for Penrith City's densely populated areas.

Based on the indicative flight paths, merge points and operating modes, the suburbs that are likely to be most affected by noise are Badgerys Creek, Kemps Creek, Mt Vernon, Luddenham village, Twin Creeks, Orchard Hills, Erskine Park, St Clair and St Marys. The number of noise events per day above 70 decibels and per night above 60 decibels for these suburbs is shown in Tables 1 and 2.

While other suburbs located to the east of the proposed merge point for the Stage 1 development are expected to experience less than 5 noise events per day above 70 decibels, North St Marys, Claremont Meadows and Werrington are expected to experience higher numbers of noise events per night above 60 decibels, when the single runway reaches capacity in 2050.

While the number of noise events above 70 decibels in the day and above 60 decibels at night has been identified, the peer review highlights that noise levels causing "community annoyance" and related impacts, such as speech interference and changes to the way individuals use outdoor spaces, has not been quantified. It notes the draft EIS includes exposed population statistics, which provide a useful indication of the potential scale of the community who may be affected by aircraft noise to varying degrees. However, in isolation, this data does not provide an indication of the scale or significance of potential community reaction to aircraft noise levels as a result of annoyance. The Health Risk Assessment (HRA) in the draft EIS provides discussion of community annoyance, including references to research concerning the relationship between noise exposure and community annoyance. The HRA, however, ultimately states that no quantitative assessment of annoyance has been conducted.

The peer review acknowledges the assessment of the risk of community annoyance is complex; however, the scale of the WSA and the number of people potentially affected warrant further evaluation of this issue. The introduction of a new 24-hour international airport at a greenfield development site introduces a risk of widespread and prolonged community annoyance. Council firmly believes a quantitative analysis of this potential risk is critical to inform the EIS process and the extent to which operational noise mitigation should be prioritised relative to other non-safety related airspace management considerations.

Table 1: Total number of noise events per day > 70 decibels (equivalent to a busy city street at kerbside)

| Western Sydney Airport Proposal – most affected suburbs in Penrith City (based on total number of noise events per day > 70db) | 2030 | | 2050 | | 2063 | |
|---|---------|---------|-------------|------------|-------------|-------------|
| | 05 Mode | 23 Mode | 05 Mode | 23 Mode | 05 Mode | 23 Mode |
| Badgerys Creek | Orange | White | Red with ♦♦ | Red | Red with ♦♦ | Red with ♦♦ |
| Kemps Creek | Grey | Red | Red | Red with ♦ | Red | Grey |
| Mt Vernon | White | White | White | White | Red with ♦♦ | Red with ♦♦ |
| Luddenham (Village) | White | Grey | Grey | Orange | Grey | Orange |
| Luddenham (Twin Creeks) | Orange | White | Red with ♦ | Orange | Red with ♦ | Orange |
| Orchard Hills | Grey | White | Red with ♦ | Orange | Orange | White |
| Erskine Park | White | White | Orange | White | White | White |
| St Clair | White | White | Red | Grey | White | White |
| St Marys | White | White | Grey | White | White | White |

Table 2: Total number of noise events per night > 60 decibels (equivalent to a busy office)

| Western Sydney Airport Proposal – most affected suburbs in Penrith City (based on number of noise events per night > 60db) | 2030 | | 2050 | | 2063 | |
|---|---------|---------|------------|------------|-------------|-------------|
| | 05 Mode | 23 Mode | 05 Mode | 23 Mode | 05 Mode | 23 Mode |
| Badgerys Creek | Red | Red | Red with ♦ | Red with ♦ | Red with ♦♦ | Red with ♦♦ |
| Kemps Creek | Orange | Red | Red | Red with ♦ | Red | Grey |
| Mt Vernon | White | White | White | White | Red with ♦ | Red with ♦ |
| Luddenham (Village) | Orange | Red | Red | Red with ♦ | Red | Red with ♦ |
| Luddenham (Twin Creeks) | Grey | White | Red | White | Red | White |
| Orchard Hills | Grey | White | Red | White | Orange | White |
| Erskine Park | Grey | White | Red | White | Grey | White |
| St Clair | Grey | White | Red | White | White | White |
| St Marys | Grey | White | Red | White | White | White |

♦♦ = >100 noise events
 ♦ = 50-100 noise events
 = 20-50 noise events
 = 10-20 noise events
 = 5-10 noise events
 = < 5 noise events

Note: Information in Tables 1 and 2 is based on WSA Online Noise Modelling Tool. The draft EIS states this information is based on indicative flight paths, actual flight paths have not yet been determined. Head to Head scenario has potential to reduce number of noise events but has not been compared in the tables.

The peer review identifies sleep disturbance associated with night-time operations, and related impacts such as the potential need for some residents to sleep with windows closed to achieve a suitable internal amenity, as a key impact of the WSA. In terms of the need for a curfew, the peer review states “we sought to investigate the level of night time impacts that might provide a clear basis for the need or otherwise for a curfew. Based on current information, there is not enough information to determine if a curfew is required (from the perspective of compliance with noise standards for sleep disturbance)”.

Significantly, because of the issues relating to airspace architecture, the mitigation measures for noise impacts in the draft EIS are broad and non-specific. No detailed assessment has been undertaken with mitigation measures in place; consequently the residual impacts, after mitigation measures are implemented, have not been defined. In particular, there are no details on whether existing dwellings would need noise insulation.

Despite the uncertainty around noise impacts, it is clear the development of the WSA, as presented in the draft EIS, will result in significant noise impacts for Penrith City residents, both day and night. Council firmly believes there needs to be a more equitable distribution of the noise impacts of aircraft movements including, but not limited to:

- Consideration of alternative flight paths and particularly alternative locations for the merge point for arrivals;
- Limits to noise exposure for any single community; i.e. noise sharing beyond the communities of Penrith, Blue Mountains and Blacktown; and
- Amendment to the Sydney Airport Curfew Act 1995 to become the Sydney Airports Curfew Act and apply to both KSA and the future WSA.

As the process for determining airspace architecture continues, it is not clear to what extent noise impacts will be prioritised over other safety, environmental, economic or social considerations. This process needs to be clearly explained in the EIS (i.e. recommendation 7).

Australian Noise Exposure Forecast (ANEF)

Historically, Council has taken steps to ensure that impacts associated with any future airport were assessed when development applications have been submitted in areas impacted by the ANEF contours, as established by the 1985 EIS. Although the contours for the Stage 1 development have not been finalised, they appear to be generally consistent with the 1985 ANEF contours. However, in 2050, they slightly increase in extent under the ‘05’ mode (including a greater area of Twin Creeks), and increase in size again for 2063 (although they do not reach as far north into Penrith City).

Given approval is now being sought for the WSA, a revised set of ANEF contours should be produced, ideally based on the long term development scenario. This would enable an assessment to be made of whether individual dwellings or other noise sensitive land uses will need additional acoustic treatment, and inform noise abatement measures for new developments.

The peer review notes the draft EIS references the 2012 National Airports Safeguarding Framework (NASF) as an instrumental tool for guiding future land planning around the proposed WSA site. This could potentially translate to the creation of land use planning controls which extend over significantly greater areas than either the current land use planning controls (based on the 1985 EIS) or the 2063 ANEC contours provided in the draft EIS. This issue has not been discussed or assessed in the draft EIS. Accordingly, Council requests further information on the proposed use of the NASF and its implications for planning and land use at the various stages of the WSA development.

In particular, if there are planning and land use implications on the economic potential of the Western Sydney Priority Growth Area, then Council firmly believes economic offset arrangements for Western Sydney must be established by the Federal Government.

Recommendations:

13. A more equitable distribution of the noise impacts of aircraft movements be determined including, but not limited to:
 - a. Consideration of alternative flight paths and particularly alternative locations for the merge point for arrivals;
 - b. Limits to noise exposure for any single community; i.e. noise sharing beyond the communities of Penrith, Blue Mountains and Blacktown; and
 - c. Amendment to the Sydney Airport Curfew Act 1995 to become the Sydney Airports Curfew Act and apply to both KSA and the future WSA.
14. The significance of impacts relating to community annoyance be quantified.
15. Sensitivity testing be presented to demonstrate changes in noise impacts resulting from modification of flight paths through subsequent processes.
16. Economic offset arrangements be established by the Federal Government for Western Sydney if there are planning and land use implications of the proposed Western Sydney Airport on the economic potential of the Western Sydney Priority Growth Area.

Note: Recommendation 7 is also relevant.

Traffic, transport and access

The draft EIS does not discuss the option of rail in the assessment of the Stage 1 (2030) development. It indicates that a rail service is not required for Stage 1 “because the recently approved road network upgrades have been assessed as adequate to support anticipated airport demand for at least a decade after operations commence”. The peer review, however, identifies that, as the WSA is not subject to any NSW approvals, there are currently no mechanisms to ensure that the road upgrades proposed as part of the Western Sydney Infrastructure Plan (WSIP) occur within the time frames required for the WSA. Council is also acutely aware of the current inefficiencies and congestion experienced on the main roads in Western Sydney and believes the WSIP upgrades are essential to addressing this existing situation, without the additional pressure of an international airport and its associated transport requirements.

The peer review for the traffic and transport assessment concludes “further information would need to be provided to enable a firm opinion to be reached on whether the conclusions in the draft EIS are valid”. Given this conclusion, it is considered that further justification must be provided on why the ‘no rail’ alternative was chosen for the Stage 1 development. This justification should also be provided as part of a broader consideration of alternatives including options for rail at or within 5 years of the opening of the WSA in 2025.

Council strongly maintains its position that a passenger rail line from the WSA to the Main Western line must be in place before the opening of the WSA. Not implementing passenger rail transport at Stage 1 and relying totally on road transport will have considerable adverse traffic and broader environmental impacts. The peer review on air quality has highlighted the provision of rail to the site, at the time of the WSA’s opening, as critical in mitigating air quality impacts. It is also paramount that a modern airport (which the draft EIS indicates “from the time operations commence ... would be a full-service airport, catering for all types of domestic and international passenger and freight services”) is provided with rail

connectivity to provide sustainable mass movement of airport patronage and reduce dependence on road transport. The rail link from the WSA to the Main Western line must be delivered from day one of the WSA operating.

The lack of mechanisms to ensure road upgrades are delivered within required time frames for the WSA is also relevant to the provision of rail to the site, particularly if it is not delivered from day one. There needs to be appropriate mechanisms in place as early as possible to ensure the timely delivery of infrastructure to support the WSA. Council firmly believes special arrangements or mechanisms involving Federal, State and local governments need to be established to develop and deliver a decades-long, funded program of infrastructure for the WSA.

The peer review indicates the traffic and transport assessment for the Stage 1 (2030) development in the draft EIS is a high level, strategic assessment, which while necessary, does not capture traffic impacts at a detailed level. The peer review identifies a number of issues with the Stage 1 assessment, including:

- No information on intersection performance and land take requirements, because no detailed traffic intersection modelling has been undertaken;
- Freight traffic generation within the WSA precinct (outside of air cargo) has not been assessed;
- Private vehicle traffic generation from land uses within the WSA precinct (outside of air passengers and direct airport employees) has not been assessed; and
- The impact on public transport operations (bus network) has not been assessed.

The peer review concludes further information would be needed to provide a firm opinion on whether the conclusions in the draft EIS are valid. In addition, the draft EIS does not consider the proposed Outer Sydney Orbital in the traffic and transport assessment.

There are two alternative routes from the M4 to the WSA site; one via The Northern Road and M12 and the other via Mamre Road, Luddenham Road and Elizabeth Drive. A comparison of the two routes indicates that the second route is shorter by about 6km. This route would therefore likely attract more traffic from areas to the north of the Mamre Road / M4 interchange. The draft EIS does not provide any details of road upgrades within the northern part of the Western Sydney Priority Growth Area (previously referred to as the Western Sydney Employment Area). Council believes Mamre and Luddenham Roads will require significant upgrades as a consequence of the Stage 1 development and will need to be widened to four lanes.

In relation to the long term development, the peer review indicates traffic and transport impacts will be significant. These include:

- The access drive from the M12 to the WSA failing by 2050 - 13 years before the ultimate long term development in 2063;
- Key road links in the wider road network being significantly congested. The assessment acknowledges that this would also be the result of growth within the surrounding area and because road infrastructure commitments past 2041 are unknown; and
- Additional rail capacity beyond the South West Rail Link extension being required to accommodate trips from both the WSA and the surrounding development.

Given these potential impacts, the peer review recommends detailed transport network planning, including road and rail, be undertaken.

Recommendations:

17. A passenger rail line from the Western Sydney Airport to the Main Western line be in place before the opening of the airport.
18. Special arrangements or mechanisms be established, involving Federal, State and local governments to develop and deliver a decades-long, funded program of infrastructure for the Western Sydney Airport, including the upgrades in the Western Sydney Infrastructure Plan.
19. The final EIS include detailed traffic intersection modelling, assessment of traffic generated from all uses on the Western Sydney Airport site, assessment of impacts on public transport operations and consideration of the Outer Sydney Orbital.
20. Mamre and Luddenham Roads be widened to four lanes to support the Stage 1 (2030) development of the Western Sydney Airport.
21. In collaboration with the NSW Department of Planning and Environment and Transport for NSW, the traffic and transport modelling be extended to include the impacts of, and infrastructure requirements to cater for, both the Stage 1 and long term developments and the ultimate level of development anticipated within the Western Sydney Priority Growth Area.

Economy and jobs

The peer review of the economic and social impacts support the draft EIS's summation that the main benefits of the WSA relate to the generation of jobs in Western Sydney and associated economic activity. In drawing this conclusion, however, the peer review maintains the need for a balanced assessment across positive and negative economic and social impacts, both at a local and regional level, and over the short and longer term. As such, it is suggested the claims made by the Federal Government about economic stimulus and job creation have not been explicitly tested in the draft EIS.

More specifically, for the Stage 1 assessment, the peer review found:

- a strong focus on the economic benefits of the WSA as distinct from a balanced discussion of economic and social costs and benefits;
- a strong focus on the regional and Australian economic benefits of the WSA as distinct from any likely local impacts;
- no discussion of the economic concerns raised in the initial stakeholder engagement program for the WSA; and
- no discussion of the economic implications of the transfer of economic activity from other areas in Sydney or 'the rest of Australia'. Whilst any such impact might be acceptable, the potential impact should be recognised and considered in the draft EIS.

Additional issues that have not been discussed in the economic impact assessment are:

- the consideration of alternatives including a cost-benefit analysis of the WSA with a curfew;
- an assessment of the economic costs and benefits of not having a rail link from the opening of the WSA;
- the particular economic impacts on each Local Government Area (LGA); and

- the needs of the expected target markets; for example, airline operators, businesses, international and domestic passengers, etc.

In relation to the long term development of the WSA, the peer review raises issues about the potential impacts on the longer term development potential of affected areas in Western Sydney; i.e. height and noise restrictions to increasing residential density. It also identifies an issue about how potential economic and social costs will be managed and mitigated with such rapid development of the site (growing by +120%) over a 13 year period from 2050 to 2063. The mitigation measures over the longer term focus heavily on planning mechanisms (i.e. zoning of land to exclude residential uses) as well as local and State Government investment to address broader traffic, transport and infrastructure issues. There is no discussion, however, of how this would be co-ordinated or resourced to address specific impacts from the WSA. There is also no discussion on who would have the key accountability. Therefore, there is a potential risk some mitigation measures and impacts would be missed or forgotten over time. Recommendation 18 seeks to address this issue.

Recommendations:

22. The final EIS provide greater clarity on the expected economic uplift and job creation potential of the Western Sydney Airport, including likely future sectors that support and flow from the airport.
23. The final EIS provide a more balanced discussion of the economic and social costs and benefits of the Western Sydney Airport, including their spatial spread.
24. The final EIS include a cost-benefit analysis of the Western Sydney Airport with a curfew.
25. The final EIS include discussion on the economic impacts of not having a rail link from the opening of the Western Sydney Airport and on the needs of the expected target markets.

Note: Recommendation 18 is also relevant.

Planning and land use

As previously discussed, the peer review notes using the NASF as a tool to guide future land use planning around the WSA site could potentially translate to having planning controls over significantly greater areas than either the current controls (based on the 1985 EIS) or the 2063 ANEC contours. This issue has not been discussed or assessed in the draft EIS. Therefore, Council requests further information on the intended use of the NASF and its implications for planning and land use as the WSA develops. In particular, if there are planning and land use implications on the economic potential of the Western Sydney Priority Growth Area, then Council firmly believes economic offset arrangements for Western Sydney must be established by the Federal Government (i.e. recommendation 16).

The draft EIS also identifies the need for new Federal Government-enforced building height restrictions in surrounding areas through Obstacle Limitation Surfaces (OLS). This will likely impact not only on developments in the Western Sydney Priority Growth Area, including the proposed Sydney Science Park, but also on developments in the Penrith City Centre and St Marys Town Centre. Council requests the OLS framework that currently applies in the Sydney Basin be extended to include the operations of the WSA to provide strategic guidance to councils in Western Sydney in considering proposals for rezoning and development in relation to building heights.

More broadly, the peer review raises an issue about the potential for a lack of integrated planning between the Federal Government and State and local government. Council

believes this integration is critical to ensure the timely delivery of infrastructure so the WSA is connected and accessible. Council also believes it is critical to ensure the WSA is embedded in Western Sydney to promote jobs, investment and infrastructure in the region.

In relation to the long term development of the WSA, the peer review notes the draft EIS does not provide a comprehensive evaluation of impacts. While this is considered reasonable, given there will be too many variables that are unknown at that stage (such as aircraft types, the conditions of the receiving environment and the pattern of urban development in Western Sydney), the peer review suggests the draft EIS “could have been bolder in its assumptions about the long term development of Sydney. The EIS is largely limited to identifying known development plans, such as the urban development associated with the growth centres and Western Sydney Employment Area. More discussion on the long term strategic planning initiatives within the region and the impact these future land uses may have on the airport would be beneficial”.

Recommendations:

26. The final EIS provide clarity on the proposed use of the National Airports Safeguarding Framework and the implications of the Western Sydney Airport on planning controls, including the planning framework for the Western Sydney Priority Growth Area, at various stages of development of the airport – 5 years (2030), 10 years (2035), 25 years (2050) and full development (2063).
27. The Obstacle Limitation Surfaces framework that currently applies in the Sydney Basin be extended to include the operations of the Western Sydney Airport to provide strategic guidance to councils in Western Sydney in considering proposals for rezoning and development in relation to building heights. Particularly reference should be provided for future development in the Penrith City Centre, St Marys Town Centre and Western Sydney Priority Growth Area.
28. Federal Government commit to work directly with the NSW Government and Penrith and Liverpool City Councils in the planning for the Western Sydney Priority Growth Area to identify structural, sectoral and land use planning frameworks for future development to support the Western Sydney Airport.

Note: Recommendation 16 is also relevant.

Other Issues

Ground noise and vibration

While ground noise impacts during construction are generally expected to be limited to the airport site, parts of Luddenham and Badgerys Creek nearest the site will potentially experience some noise at different stages, such as during earthworks in the north and northwest sectors of the site. However, it is noted that the noise management level in the relevant guidelines contained in the Airports (Environment Protection) Regulations 1997, which will be used to regulate this activity, is expected to be achieved for all surrounding residents.

The draft EIS indicates noise associated with road traffic generated by the WSA will not be significant; however, consideration has not been given to the noise impacts associated with the proposed M12 motorway, which would provide the primary road link to the airport.

Under worst case meteorological conditions, the draft EIS indicates impacts associated with aircraft taxiing will extend over Luddenham and Badgerys Creek in 2030, expanding to Wallacia by 2063. The draft EIS also indicates noise generated by aircraft engine runs has the potential to affect a larger area, with Luddenham and Badgerys Creek impacted in 2030, and Wallacia and Luddenham in 2063. While the noise levels are not anticipated to significantly change between 2030 and 2050 as activity intensifies up to the capacity of the single runway, ground noise from engine runs and taxiing is expected to increase in frequency, given increased aircraft movements.

The draft EIS identifies mitigation measures that may assist in reducing the noise impacts associated with these on-ground activities. It is noted that some of these measures are accepted best practice measures for airport operations, while others are site-specific, including the selective construction of barriers, buildings or mounds in particular areas to assist with noise shielding.

The peer review identifies that:

- There is “insufficient detail” to confirm whether the noise readings were taken from appropriate locations or in appropriate conditions;
- Proposed construction hours (6am to 6pm Monday to Saturday) are outside of the NSW Environment Protection Authority’s standard hours of work (7am to 6pm Monday to Friday, 8am to 1pm Saturday). The draft EIS does not include any discussion on the variance;
- There is no consideration of the noise impacts associated with the proposed M12 motorway;
- The type and magnitude of noise impacts and the effects of proposed mitigation measures are not clearly addressed. The significance of these impacts is also not delineated.
- The implications of low frequency noise or other factors included in the NSW Industrial Noise Policy are not addressed.
- The technical assessment does not provide a cumulative assessment of the noise impact associated with all ground noise sources. This should be provided and should demonstrate the noise levels at sensitive receivers both with and without the implementation of the proposed mitigation measures.

The peer review outlines some potential measures for reducing noise generated by aircraft taxiing, which could be explored; however it is noted additional investigations may be required to assess the effectiveness of these options.

Recommendation:

29. The final EIS address the issues identified in the peer review in relation to ground based noise.

Air quality

During construction of the Stage 1 development, earthworks and aviation infrastructure works will result in emissions of dust and particulate matter, as well as odour from the asphalt plant. Modelling has shown that dust impacts will be below the relevant air quality assessment criteria. Odour from the asphalt plant is also predicted to be below the established criteria at all residential receivers.

During operation of the Stage 1 development, there will be an increase of emissions of particulate matter, sulfur dioxide, nitrogen dioxide, carbon monoxide, air toxics and odour. The highest off-site concentrations of these are expected to occur towards the north and northeast of the site; however, it is noted that the air quality criteria will be achieved at all off-site residential receptors.

Traffic associated with the WSA on the surrounding roadways will be the largest source of emissions during the Stage 1 development.

The draft EIS also considers air quality at a regional level, with consideration given to ozone concentrations. Only a marginal impact to the daily maximum 1-hour concentration was predicted in 2030, at 0.1 ppb above the level permitted by the NSW Environment Protection Authority.

The impacts to air quality from the construction of the long term development were not quantitatively assessed. The draft EIS, however, states dust emissions will need to be low to ensure that the safety requirements of the WSA are met. In the long term, airport operations will cause an increase in emissions of particulates, nitrogen dioxide, carbon monoxide, sulfur dioxide and air toxics. However, given the uncertainty regarding future emissions, only particulates and nitrogen dioxide are modelled. Modelling shows that the relevant assessment criteria can be met for the receivers in Penrith City, except for the short term nitrogen dioxide objective at several residential receptors (in Wallacia, Mt Vernon and Badgerys Creek) for limited periods between one and two hours per year. Operations of the WSA in the long term will result in ozone concentrations significantly above those permitted by the NSW Environment Protection Authority.

The peer review identifies that:

- The assessment of the Stage 1 development is based on the air traffic movement figures for 2030, with 63,302 movements. While an assessment for this time period is useful, a better understanding of the likely air quality impacts of the WSA would be obtained if an assessment is based on air traffic movements when the single runway reaches its capacity in 2050 (i.e. recommendation 2). The anticipated air traffic movements, at this time, are three times higher, at 185,000 movements.
- The long term air quality assessment assumes that a rail network will be constructed and in use at this time, and has not considered the potential for higher traffic

numbers. Given road traffic is a significant source of emissions in the assessment, this as a “critical assumption”, as no rail network has been approved and approval is not being sought as part of this proposal. Council, nevertheless, firmly believes a passenger rail line from the WSA to the Main Western line must be in place before the opening of the WSA and is critical in mitigating air quality impacts (i.e. recommendation 17).

- It is not possible to verify the conclusions of the draft EIS in relation to local air quality, as there are numerous inconsistencies that undermine the credibility of the assessment.

Recommendations:

30. The final EIS include an assessment of the likely air quality impacts from increased traffic associated with the Western Sydney Airport and without rail services, beyond the Stage 1 (2030) development.
31. The final EIS address the inconsistencies identified in the peer review in relation to air quality.

Note: Recommendations 2 and 17 are also relevant.

Human health risks

In terms of risks to human health, there is potential for some locations within the Penrith LGA to be affected by the WSA in some capacity. The draft EIS, however, is not clear on what the specific human health impacts will be for Penrith’s residents.

The baseline health status profile used in the draft EIS does not include the Penrith LGA. There should be some discussion on why this is the case. Consideration of vulnerable populations is based around SEIFA (Socio-Economic Indexes for Areas) scores only. The final EIS should explain why only these scores, and not additional indicators of disadvantage, are included.

There is no rationale given on why a Health Risk Assessment (HRA) has been undertaken rather than a Health Impact Assessment (HIA). The HRA approach only considers noise, air quality and water quality, and does not address the full range of determinants of health. The risk to health is also narrowly defined as the chance or risk of a disease or fatality occurring. The assessment makes no use of the large evidence base on the association between health determinants, particularly social, and health outcomes. The assessment needs to address all potentially significant health impacts associated with the WSA, such as changes to employment, transportation, traffic, amenity, ecological sustainable development and housing. Cumulative impacts are considered elsewhere in the draft EIS, however, it is not clear if those cumulative impact assessments are used in the human health assessment.

It is critical that information is included in the final EIS on the specific human health impacts for Penrith’s residents as suburbs within the Penrith LGA are expected to experience significant impacts from noise, particularly those closest to the airport. The main health risks associated with noise are sleep disturbance, cardiovascular disease, cognitive impairment, tinnitus, annoyance and hearing impairment.

While the majority of outcomes for air quality are predicted to be below accepted thresholds, the highest off-site concentrations of emissions of particulate matter, sulphur dioxide, nitrogen dioxide, carbon monoxide, air toxics and odour are expected to occur towards the north and northeast of the airport site. The main health risks associated with these

emissions are increased risk of mortality, hospital admissions for respiratory disease and chronic respiratory symptoms, cancer, cardiovascular disease, irritation of the eyes, nose, throat and lungs and asthma.

In terms of groundwater and surface water quality, a complete assessment of health impacts has not been conducted due to insufficient data.

The peer review suggests the draft EIS needs to discuss community feedback on health concerns and how this feedback was considered and addressed in the assessment.

Mitigation measures are not discussed in any detail and are cross-referred to the air quality and noise chapters of the draft EIS. An outline of proposed measures should be provided in the chapter on human health and an explanation provided on how and to what extent these measures will mitigate the identified health impacts.

The peer review notes that should details on the WSA change, most particularly the flight paths, then the outcomes of the HRA should be reviewed to confirm that the change does not alter the conclusions or recommendations made in the assessment.

Recommendations:

32. The final EIS include information on the specific human health impacts for the residents of Penrith City.
33. The final EIS address the issues identified in the peer review in relation to human health risks, including:
 - a. Justification on why a Health Risk Assessment has been undertaken rather than a Health Impact Assessment;
 - b. Justification of the impacts, risks and effects on other vulnerable or sensitive groups in the Penrith Local Government Area (LGA).
 - c. Inclusion of a consolidated list of specific human health mitigation measures. This should identify what the potential impacts are in specific suburbs in each LGA affected and the mitigation measures applied in each area.
 - d. Presentation of the health outcomes in the chapter on human health in a way that helps to communicate the scale of the population affected, by determinant of health, and what the combined impacts are likely to be to various communities from exposure to the combined hazards.
 - e. Inclusion of a wider discussion of health impacts where quantification is not currently recommended by national guidance, such as air quality impacts on children and other chronic effects, but for which there is a widely acceptable evidence base supporting their likely occurrence.

Hazards and risks including fuel dumping, bird strike and bushfires

The draft EIS indicates fuel jettisoning or dumping is expected to have only a limited impact to local air quality, due to the strict guidelines in place to regulate this activity. Consequently, it does not contain a more formal assessment of the impacts to air quality that may be caused by this practice. The draft EIS outlines that the location and altitude of a fuel jettison is required to be approved by air traffic control, and jettisoned fuel vaporises rapidly before it reaches the ground. It indicates many aircraft are not able to dump fuel, and the amount of fuel jettisoned is also decreasing due to improvements in the fuel efficiency of aircraft. The

peer review concludes the information presented in the draft EIS in relation to fuel dumping is appropriate though discussion of local effects would provide reassurance to local governments and communities.

In terms of the risk of bird and bat strike, the draft EIS concludes the overall risk is low and proposes design elements to reduce the 'attractiveness' of the site to fauna to minimise strike. The peer review, however, indicates that the bird and bat strike assessment is preliminary and further work is required to confirm the level of risk and to refine the mitigation strategies, in parallel with design development. The technical report supporting the draft EIS, prepared by Avisure, provides recommendations for further work, including monthly bird and bat surveys for one year to account for seasonal changes.

In relation to impacts on bushfire fighting, Council notes the media release from the Minister for Infrastructure and Regional Development on 19 November 2015, which states "... Australian flight rules - issued by Australia's independent aviation safety regulator, the Civil Aviation Safety Authority - give priority to any aircraft engaged in fire and flood relief, search and rescue, or medical evacuation over aircraft engaged in routine or normal operations. Further, Airservices Australia, which provides air traffic control services work very closely with New South Wales emergency service agencies to assist their operations".

Recommendations:

34. A condition of approval be imposed that a hazard and risk plan specify that fuel jettisoning or dumping not occur over drinking water catchments and heavily populated areas. Further, that the altitude that fuel dumping can occur at is sufficient to allow evaporation and dispersal prior to ground strike.
35. A condition of approval be imposed requiring a risk management plan that ensures that adequate measures are available to redirect flights to other facilities when bushfires are within a predetermined radius of the Western Sydney Airport.
36. The final EIS include further information to confirm the level of risk of bird and bat strike and to refine the mitigation strategies.

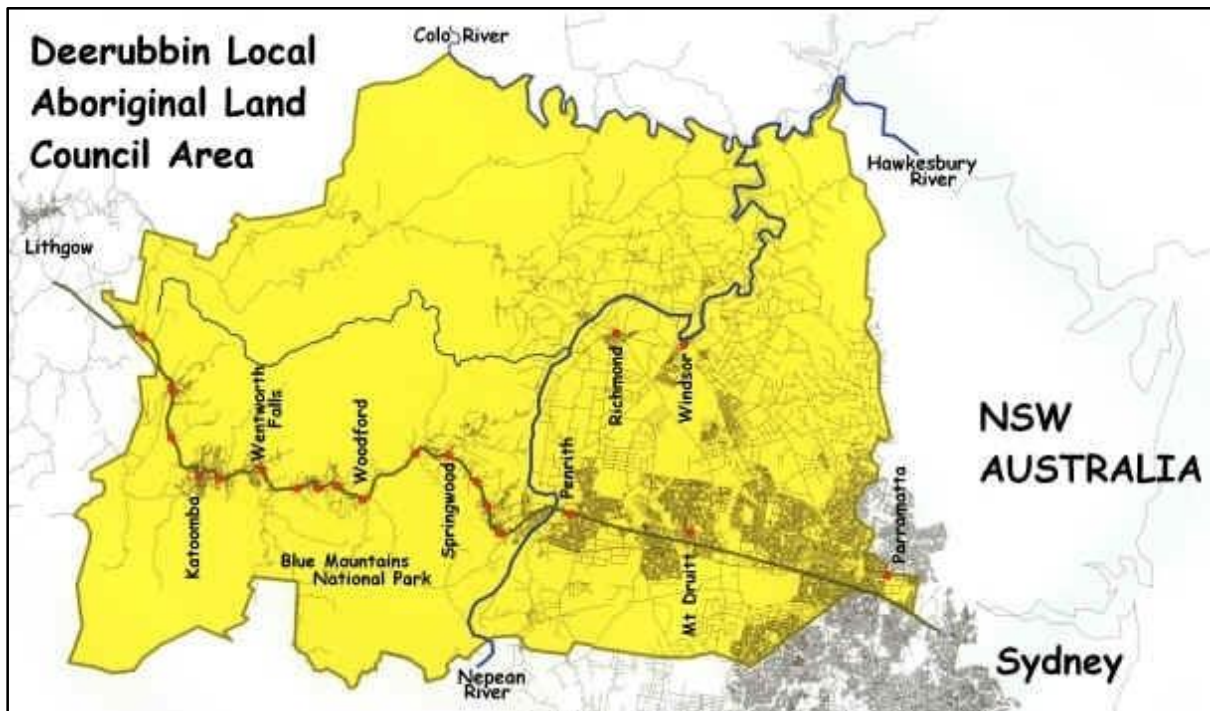
Aboriginal and European heritage

The site of the WSA is just outside of the Deerubbin Local Aboriginal Land Council (LALC) boundaries (see map below from Deerubbin LALC's website). However, noise from the overflight of aircraft has the potential to adversely impact the heritage values of the Deerubbin LALC lands, including those at Yellow Rock, Cripple Creek and Glenbrook. Consultation with Aboriginal communities in the Penrith LGA appears to have been limited. It is recommended the Deerubbin LALC and other local Indigenous stakeholders be included in future mitigation and management consultations and be invited to be involved in archaeological monitoring and works.

Almost all of the mitigation measures currently proposed relate to the pre-construction and construction phases of the airport. Consideration should be given to mitigation measures that provide ongoing benefit for the local Indigenous community; such as the development and implementation of a local industry participation plan that guarantees Aboriginal employment opportunities during the construction and operation of the WSA.

The draft EIS identifies seven sites of European heritage within the Penrith LGA, most of which are adjacent to the WSA site in the village of Luddenham. As such, they will not be directly affected by airport construction works. If there are any future proposals to undertake noise abatement works on the heritage items, however, the works will need to be

carefully managed as it is difficult to undertake these works on heritage buildings. It is considered that all works to heritage items will need heritage approvals including the supply of Statement of Heritage Impact reports.



Recommendations:

37. Deerubbin Local Aboriginal Land Council and other local indigenous stakeholders be included in future mitigation and management consultations and be invited to be involved in archaeological monitoring and works.
38. Any future noise abatements works on heritage items be subject to heritage approvals including the supply of Statement of Heritage Impact reports.

Groundwater, surface water and flooding

Based on the information provided in the draft EIS, the WSA as proposed, is likely to have an adverse impact on the health and geomorphology of the receiving waterways (including Cosgrove Creek, Badgerys Creek, Oaky Creek and South Creek) due to increased nutrient loads and alterations to the hydraulic regime. While the proposed stormwater treatment measures include eight detention basins and some stormwater reuse, the draft EIS indicates additional treatment measures will be necessary to achieve the required water quality and flow management outcomes.

The peer review suggests that the draft EIS appears to dismiss any relevance of increased pollutant loads on the receiving environment. It also points out the performance criteria used in the stormwater modelling are outdated and no longer considered to be best practice. Given the significant change in land use and extensive earthworks proposed on the site, there is an opportunity to introduce higher levels of stormwater management and water quality treatment to the development which would act to minimise its impacts and potentially improve the outcomes. This would also assist in minimising cumulative impacts on the environment that may occur in combination with the surrounding development in the Western Sydney Priority Growth Area.

In relation to groundwater, the peer review identifies the lack of qualification of data and no baseline time-series data has been collected. Two residual risks are identified: soil and subsurface contamination from a spill/release of chemicals or contaminants, and an impact on groundwater dependant ecosystems from reduced water supply. The extent of the impact on groundwater dependent ecosystems, including Cumberland Plain Woodland, which is a Matter of National Environmental Significance (MNES) under the EPBC Act, has not been fully considered. It will be necessary to develop appropriate groundwater impact management strategies to address these risks.

The proposed earthworks (i.e. levelling the land) will divert stormwater flows from one catchment to another, and thus, will cause flood impacts. The WSA will also increase stormwater runoff as a result of increased paved areas. Some of the detention basins are intended to be partially constructed for the Stage 1 development to mitigate flood impacts. However, downstream flood levels are predicted to increase significantly.

The draft EIS does not adequately assess flood impacts. The assessment considers impacts only for a short distance from the airport site; however, flood impacts will extend for a considerable distance within the Penrith LGA. It is difficult to quantify how many properties will be affected by the proposed development without a full flood assessment being undertaken.

Recommendations:

39. The stormwater management strategy be revised to meet current best practice pollutant reduction and flow management targets to ensure the impacts on all receiving waterways are minimised.
40. Additional stormwater harvesting and reuse be incorporated into the stormwater management strategy for both construction and operational phases.
41. An appropriate groundwater impact management and monitoring strategy be prepared to address the risks to groundwater contamination from a spill/release of chemicals or contaminants and to effectively manage the risk to groundwater dependent ecosystems, including Cumberland Plain Woodland.
42. A comprehensive water management and monitoring strategy, which considers all sources of water (stormwater, rainwater harvesting from buildings, etc.) be prepared and implemented.
43. The flood impact assessment (including flood modelling) be undertaken for all tributaries taking into account all flooding scenarios. Hydraulic models should be extended and affected properties identified.
44. The final EIS include an assessment of flood impacts associated with the operation of the WSA at 2050.

Impacts on the Greater Blue Mountains World Heritage Area

The assessment in the draft EIS of the potential impacts on the GBMWA is focused on noise, air emissions and amenity impacts from the overflight of aircraft, lighting and traffic.

In relation to noise, the draft EIS indicates aircraft will typically be at an altitude of about 5,000 feet, which corresponds to a noise level on the ground of approximately 55 dB L_{Amax} consistent with modelled predictions for the Airbus A320 or Boeing 737-800. The peer review, however, notes measurements taken at other airports have demonstrated that

aircraft at this altitude generally have higher noise levels than those predicted. The peer review suggests noise levels in practise could be higher.

The peer review also notes the assessment of noise impacts in tranquil areas is complex and guidance on the subject is limited. It states "... levels below 55 dB LAmax could be considered intrusive by recreational visitors and other users ... (and) it is not considered appropriate to assess aircraft noise intrusion by comparing sound pressure levels". The peer review points out that the characteristics of aircraft noise and natural sound sources are very different, and are interpreted in different ways. It states "the potential for a large number of audible events below 50–55 dB LAmax is therefore considered to potentially represent a significant and widespread impact within the GBMWA", contrary to the conclusion in the draft EIS that noise impacts are "not significant". The peer review suggests the conclusion in the draft EIS has not been sufficiently justified and further assessment is warranted.

The impacts on the GBMWA will depend on airspace architecture, and particularly the proposed merge point for arrivals. Airspace architecture must distribute air traffic more equitably to minimise impacts on the Blue Mountains villages, particularly Glenbrook, Lapstone and Blaxland, and to minimise adverse impacts on tourism, which is a critical regional economic driver.

In terms of the potential impacts on the amenity of the GBMWA, the peer review notes a number of "sensitive tourism and recreation areas" were used in the assessment. However, these did not include towns located in the lower mountains area, walking tours, sporting events and canoe/kayak trails along the Nepean, Grose and Colo Rivers. The peer review suggests these should be included in the assessment.

In terms of the potential impact on the biodiversity values of the GBMWA, this assessment has been deferred until a "multidisciplinary workshop" is held to identify and assess potential impacts. This assessment should have been included in the draft EIS.

Recommendations:

45. Further assessment of the noise impacts on the GBMWA be undertaken to:
 - a. Confirm the noise levels of aircraft at expected altitudes;
 - b. Take account of ambient noise levels; and
 - c. Include additional sensitive tourism and recreation areas identified in the peer review.
46. The multidisciplinary workshop be convened as a matter of priority to determine impacts on the biodiversity values of the GBMWA.

Note: Recommendations 13 and 34 are also relevant.

Biodiversity

The Stage 1 development will result in the removal of 255.3ha of native vegetation plus 25.4ha of wetlands and associated vegetation. The long term development will result in a further clearing of 117.8ha of native vegetation and 9.6ha of wetlands and associated vegetation. A 'Significant Impact' will occur on several threatened flora and fauna species and ecological communities. In particular, the draft EIS found the construction of the WSA will threaten the on-going survival of Cumberland Plain Woodland.

The peer review identifies that:

- Assessments of significance have not been completed for several flora and fauna species listed under the EPBC Act. The draft EIS deemed that these species had a possibility of occurring on the site, but dismissed them without first undertaking an assessment. The risks associated with not completing assessments of significance is that the proposed mitigation and offsets may not account for their specific requirements.
- The draft EIS states that groundwater dependent ecosystems are likely to occur in the area but no assessment has been undertaken. It is therefore unclear what level of impact the airport will have on these ecosystems.
- The predicted effectiveness, policy basis and cost of mitigation measures has not been assessed and it has not been stated if the impacts are unknown, unpredictable or irreversible. This should be addressed to allow an informed assessment of the level of impact of the airport and of the suitability of mitigation measures proposed.
- The proposed mitigation and management measures are for the Stage 1 development only. All offsets, mitigation and management measures should be confirmed for the 2050 development scenario and described in detail as part of the draft EIS.
- The proposed Conservation Zone will only protect 8.5ha of Cumberland Plain Woodland (only 5.7% of the EPBC listed Cumberland Plain Woodland on the site). This is considered insufficient.
- A potential transport corridor (15ha) is proposed to pass through the Conservation Zone located to the west on the runway. This equates to 12.3% of the entire Conservation Zone and is positioned through one of the most densely vegetated areas of the site, significantly compromising the objectives of this zone.
- The Offset Strategy does not demonstrate that it is able to offset the residual impacts associated with the airport as required under the EPBC Act. It is essential this be addressed prior to the finalisation of any approval. The Offset Strategy has not yet been finalised into an offset package as required by the EPBC Act's Offset Policy. The offset package is required to achieve a 90% direct offset ratio, but at present there is a significant deficit in the amount of offsets available. The Offset Strategy cannot demonstrate that enough offsets will be available for purchase. Without certainty around the availability of offsets, the proposed airport does not currently meet the EPBC Act's Offset Policy, and the premise of the biodiversity assessment is significantly flawed. Offsets are required to be identified prior to approval to ensure that the offsets will actually occur.

In addition, it is of concern that the identified potential offset sites are generally located in areas that are already prohibited from development due to flood restrictions or zoning, and most sites are currently in public ownership. Where possible, credits should be encouraged to be sourced from locations that would provide an increase in the area of Cumberland Plain Woodland that is protected, rather than protecting and improving what is already generally protected.

- Greater consideration should be given to the cumulative impacts of development in Western Sydney and the relationship with the WSA. It is questionable if the required number of offsets will be available for the WSA, when considered with the number of offsets also required for other developments. It is likely there will not be sufficient areas of Cumberland Plain Woodland available to meet the offsets needed in Western Sydney.

Recommendations:

47. The final EIS address the issues identified in the peer review in relation to biodiversity, including:
- a. Inclusion of a statement on whether the impacts are unknown, unpredictable or irreversible and an evaluation of the predicted effectiveness, policy basis and likely cost of all mitigation and management measures;
 - b. Inclusion of Assessments of Significance for all relevant species and a full assessment of the impact of the Western Sydney Airport on groundwater dependent ecosystems;
 - c. Prior to approval, finalisation of the Offset Strategy into an offset package, including the identification of all required offsets for both the Stage 1 and 2050 developments. Credits should be sourced from locations that will provide an increase in the area of Cumberland Plain Woodland that is protected, rather than from sites that are currently not suitable for development;
 - d. Inclusion of measures to improve the conservation outcomes for the proposed Conservation Zone on the site, including relocation of the proposed road corridor through the zone and protection of additional areas of native vegetation, particularly Cumberland Plain Woodland; and
 - e. Greater consideration of cumulative impacts.

Social impacts

The social impact assessment only assesses social impacts directly caused by the WSA. In reality, however, the most significant social outcomes will be from the cumulative impacts of the site and locality changing from a rural and low density residential area to a more urbanised one. The substantial economic costs to not accommodating the growth in aviation demand should not be at the expense of the social costs to communities if the proposed WSA does not succeed in providing opportunities for positive change and improved socio-economic outcomes for Western Sydney.

The peer review found the social impact assessment in the draft EIS is not a balanced discussion of relative costs and benefits, but rather emphasises economic benefits and downplays social concerns. There is not enough discussion about the impacts on social cohesion, social concerns about local community health, pressure on social services or household relocation. While the assessment discusses social impacts on the Western Sydney region, there is no discussion of social impacts on the immediate local area. The assessment also fails to directly address concerns raised during stakeholder engagement.

A key issue that needs to be discussed in the assessment is the negative social impact of further transport disadvantage and isolation caused by the lack of public transport options to the WSA, particularly the lack of rail services from the opening of the airport. As previously stated, the rail link from the WSA to the Main Western line must be delivered from day one of the WSA operating (i.e. recommendation 17). There are also social implications for food security resulting from the loss of productive agricultural land and agribusinesses. This needs to be discussed, including supporting the continued use of agriculture in the interim period on land not required for development and on surrounding lands. Another issue not discussed is the risk of adverse social impacts if the WSA does not achieve anticipated capacity projections.

In terms of mitigation measures, Council firmly believes the provision of passenger rail before the opening of the WSA and a more equitable distribution of noise impacts, including the adoption of a curfew, are critical to addressing a range of impacts, including social impacts on Penrith and Western Sydney communities. In addition to the mitigation measures identified in the social impact assessment, the following measures should be considered:

- Extension of the proposed local industry participation plan and equal opportunities policy beyond the construction period;
- Provision of employment targets or quotas to guarantee the recruitment of locally based workforce and local suppliers, and especially ensure Indigenous participation;
- Provision of additional funding for affordable housing for key workers;
- A commitment to designing, constructing and operating the WSA to achieve best practice sustainable building practices; and
- A commitment to an evaluation and monitoring program for the mitigation plan.

Recommendations:

48. The final EIS address the issues identified in the peer review in relation to social impacts.

49. The cost benefit analysis of economic benefits include modelling of the economic costs of lifestyle, amenity, health and other social impacts.

50. The social impact assessment include discussion on the loss of productive agricultural land and agribusinesses.

51. The social impact assessment include discussion on the risks if the Western Sydney Airport does not achieve anticipated capacity projections.

52. Additional mitigation measures, as recommended in the 'social impacts' section in Council's submission, be included.

53. A condition of approval be imposed that requires a joint government integrated response plan to be prepared and implemented to deal with identified social impacts.

Note: Recommendation 17 and the recommendations relating to aircraft noise and economy and jobs are also relevant.

Waste management and resource recovery

A separate review of the waste management and resource recovery components of the draft EIS has been undertaken by WSROC and MACROC on behalf of Western Sydney councils. This is to ensure that all waste and recycling issues detailed in the draft EIS consider the potential for waste diversion and resource recovery, and there is no negative impact on the ability of councils to provide waste services to their communities.

The review of the draft EIS identifies a number of issues that, if not considered and managed correctly, have the potential to impact on councils' waste management practices. Whilst a few positive potential outcomes and opportunities are identified, the overwhelming conclusion is that there is generally insufficient information in the draft EIS for a full and considered assessment of the impacts of the proposed WSA on waste and resources management.

The key issues that emerge from the review are:

- No consideration has been given to prevention or mitigation of littering and illegal dumping as a result of the proposed airport; and
- No concrete assessment has been provided of the capacity of landfills and recycling facilities in the area to accept and dispose of construction and ongoing airport waste. This requires further investigation and may have an impact on councils' usage of these facilities in the future.

The separate review makes a number of recommendations, including recommendations in response to the above issues. Council endorses these recommendations.

Recommendation:

54. The final EIS address the recommendations in the separate WSROC / MACROC review on waste management and resource recovery.

Lighting

The draft EIS identifies a number of main light sources from the WSA and its operations. It states planning for lighting is, at this stage, an indicative concept. Lighting impacts may come from the lighting of buildings, beacons, the runway and sky glow. The draft EIS indicates the orientation of the runways will limit the areas which could be affected by lighting, and the layout itself will provide a buffer to surrounding sensitive land uses. It also cites compliance with relevant Australian Standards as a mechanism to ensure impacts are minimised.

The draft EIS contains inadequate information to take a conclusive position on the potential impacts of lighting.

Recommendation:

55. Further information be included on the obtrusive effects of outdoor lighting to enable an informed assessment of the potential impacts to be undertaken.

Consultation

Council is disappointed by the Federal Government's refusal to extend the exhibition period for the draft Airport Plan and draft EIS, despite requests from Council and other stakeholders. As expressed in our letters to the Hon. Greg Hunt MP, Minister for the Environment (dated 18 June, 19 October and 20 November 2015), the Hon. Warren Truss MP, Deputy Prime Minister and Minister for Infrastructure and Regional Development, and the DoE and DI&RD, Council firmly believes that allowing only 60 days to assess and respond appropriately is insufficient, given the level of detail and technical complexity, and the significant impacts the WSA could have on our community. Understanding the actual extent of those impacts has been made even more difficult by the draft EIS, which is based on conceptual airspace architecture and an airport development for only the first five years of operation.

Recommendation 1 of Council's submission requests that the final EIS address the issues identified in the peer review. Recommendation 2 requests that the final EIS be amended to reflect the development and operational activity of the WSA at 2050, when the single runway reaches its capacity. The recommendations relating to airspace architecture and aircraft noise seek to address the inadequate assessment of flight paths and merge points, and the resultant noise impacts, requesting that there be a more equitable distribution of these noise impacts. Given the significant uncertainty around the WSA and its likely environmental impacts, Council believes that it is imperative the community and stakeholders are effectively consulted and engaged in all subsequent key processes and decisions on the future growth and development of the WSA.

The peer review also reinforces the uncertainties around these subsequent processes. In particular, future development and expansion of the WSA beyond 2030 will be subject to further planning and assessment under the Airports Act, with the preparation of a master plan required within five years of the commencement of the airport. The draft EIS, however, is not clear on:

- What the specific assessment and approval requirements would be for development beyond 2030 once an Airport Lessee Company is appointed and more is known about the actual layout and operations of the airport;
- What the potential triggers would be for further referrals and approvals under the EPBC Act; and
- What level of community and stakeholder engagement would be undertaken in the future.

Recommendation:

56. The community and stakeholders be effectively consulted and engaged in all subsequent key processes and decisions on the future growth and development of the Western Sydney Airport.

57. The final EIS detail the subsequent assessment and approvals processes once the Airport Lessee Company is appointed, including the level of community and stakeholder engagement that would be undertaken.

Conclusion

While the Federal Government's draft Airport Plan and draft EIS have been prepared to seek approval for only the Stage 1 (2030) development of the WSA, a decision to proceed will have significant consequences, both positive and negative, for our City including beyond 2030.

Council's position to accept the Federal Government's decision to build a second airport at Badgerys Creek recognises the great potential the airport offers as a catalyst for increased infrastructure, jobs and investment in our City and the Western Sydney region. This position, however, is subject to a number of preconditions which seek to maximise the benefits and minimise the impacts of the airport. There must be a more equitable distribution of the noise impacts of aircraft movements by considering alternative flight paths and merge points, limiting the noise exposure for any single community (i.e. noise sharing) and amending the Sydney Airports Curfew Act to apply to both KSA and the WSA. Further, there must be full and effective integration of airspace in the Sydney Basin for the shared operations of KSA and the WSA. Vital transport connections and supporting infrastructure must be in place before the opening of the WSA, particularly rail from the airport to the Main Western line. Economic offset arrangements must be established by the Federal Government for Western Sydney if there are planning and land use implications of the proposed WSA on the economic potential of the Western Sydney Priority Growth Area. Special arrangements or mechanisms must be established, involving Federal, State and local governments to develop and deliver a decades-long, funded program of infrastructure for the WSA. It is also crucial that all economic, social and environmental benefits and impacts are fully addressed in the EIS and proposed mitigation measures detailed and included in any approval to ensure the health and wellbeing of our community is maintained.

The WSA is intended to adopt the latest thinking and technology in its design and operations and will be a catalyst for long term growth that will transform Western Sydney. Council believes there is still considerable work to be done to ensure the WSA maximises its benefits and minimises its impacts on Penrith and Western Sydney. Council is committed to continuing to work with the Federal Government to deliver a WSA that is fully and effectively integrated with Western Sydney and delivers significant benefits to the region in terms of transport and infrastructure provision, employment and economic development.

Council requests that as planning for the WSA proceeds, the community and stakeholders be effectively consulted and engaged in all subsequent key processes and decisions on the future growth and development of the airport.