



Trish Doyle MP – Member for Blue Mountains

Submission to the Public Consultation for

The Western Sydney Airport Draft Environmental Impact Statement

16 December 2015

Preamble

I make the following submission to the Western Sydney Airport Draft Environmental Impact Statement (EIS) consultation process, in my capacity as the State Member for Blue Mountains and a local resident raising a family in the Blue Mountains.

While the public consultation through the draft EIS process is a bureaucratic process, and the political decision by the Abbott-Turnbull Federal Government to build an airport in the first place is beyond my control, I have spent many weeks looking at the details of the proposed airport contained in the EIS and talking to concerned members of the community which I represent.

It is on behalf of my Blue Mountains community that I broadly question the value of an airport in the first place, when the cost of it (monetary, environmental, health and lifestyle) is so considerable.

In the days and weeks after the draft EIS was published, I was approached by an overwhelming number of people asking for assistance and guidance in preparing a submission to the public consultation process. The sheer number of people making this specific request of me made it clear that there was an even broader level of concern within the community about the proposed airport and the negative impacts it will have on our villages and towns if it is allowed to go ahead.

The draft EIS is over 4000 pages long. I take this opportunity to once again call in to question the judgment of political leaders responsible for this project who allowed such a short window of opportunity (just 60 days), for members of the public to respond to the EIS.

On 12 November 2015, I publicly called upon the Federal Government to extend the 18 December deadline for submissions to the end of January 2016. This call was ignored.

In my view, it is cynical and contrary to the public interest to offer such a short window of opportunity for members of the public to respond to the EIS. Moreover, to time the submissions deadline with the beginning of the Christmas/New Year holiday season is especially cynical.

This is a clear example of the Federal Government employing procedural tactics against the community so as to reduce the number and quality of responses to the public consultation process.

I am disappointed that the Federal Government has begun this process with cynical tactics such as these; it indicates to me that they are not interested in the *best* outcome or even the *best* airport (whatever that may look like), but that they are determined to achieve a particular outcome of their preference, in the shortest possible timeframe, and in spite of valid concerns and community opposition.

Accordingly, I ask that the window of opportunity for public submissions to the **FINAL** Environmental Impact Statement, whenever it is published, be extended to at least 90 days. Further, I ask that it be conducted in such a way as to encourage and facilitate as broad a response from the community as possible.

Revelations published on 12 December 2015 in the *Blue Mountains Gazette* that the draft EIS was altered/amended by Government officials after going on public exhibition undermines public faith in the consultation process. In my view, this represents a serious breach of procedure and a breach of trust. It is made worse that this has come during the later stages of the public consultation window as so many local residents are putting the finishing touches on their own submissions. Proponents of any development, be it a new house or a new airport, can never hope to persuade impacted residents of the benefits of their project if they are caught

trying to fiddle their numbers. Residents are right to be angry at this underhanded and unethical behaviour by the Federal Government.

In this submission, I will address the concerns I hold about the airport proposal under the following areas of concern:

- Environment
 - World Heritage listing
 - Bushfire risk and management
 - Drinking Water Catchment
- Lifestyle
- Equity and Curfews
- Inadequacies/Omissions in the EIS
 - Levels of Impact
 - Aboriginal Heritage Impacts
 - Flight Paths and Airport Operations
 - Public Transport

Environment

This is a primary area of concern for me, and one which has a number of distinct areas of concern within it. The draft EIS analysis says very little of any substance about the potential impact on the Greater Blue Mountains World Heritage Area of “aircraft overflight” above our National Parks or risks to our drinking water catchment area. This, in my view, is a reckless oversight which needs an immediate response from qualified planners and experts; media releases on the topic from the Minister, which is the response received to these concerns to date, are not at all reassuring and are wholly inadequate.

In addressing this area of concern, I pay tribute to the work of the apolitical experts in the Blue Mountains Conservation Society, who have analysed the environmental impacts of the Airport proposal and published extensively on the matter.

Aside from specific local environmental concerns, it is important to note that the Executive Summary of the draft Environmental Impact Statement notes that the new airport would generate 130,000 tonnes of carbon emissions per annum by 2030. This figure does not include the emissions of aircraft. According to the Blue Mountains Conservation Society, the aggregate figure for carbon emissions arising from airport operations and aircraft is 2.64 million tonnes by 2030.

I am therefore concerned that any new airport would add to overall carbon emissions within the Australian economy, when we must instead be looking for ways to work and travel while emitting less carbon dioxide. If we are to invest public money in new transport projects, we should do so without adding to overall demand for emissions intensive activity.

RECOMMENDATION 1: The Federal Government should move away from investing in projects which stimulate both supply and demand of emissions intensive economic activity – this is especially the case for energy production projects, but also major transport developments. The Federal Government should restore the level of public funding of public transport projects that was in place during 2007-2013 and abandon its exclusive focus on motorway and airport infrastructure projects.

Blue Mountains' World Heritage Listed National Park

Following the work of my predecessor as Member for Blue Mountains, the Hon Bob Debus AM, the Blue Mountains National Park was listed by UNESCO as being of World Heritage significance in December 2000.

A key justification for the listing, more than just the outstanding natural beauty of the region and the pristine, ancient wilderness within it, was eucalypt biodiversity within the region and the associated flora and fauna that are unique to the area.

The NSW Department of Environment says of the region:

"[The Greater Blue Mountains World Heritage Area] includes very extensive areas of a wide range of eucalypt communities and large tracts of wilderness. The high wilderness quality of much of the Greater Blue Mountains constitutes a vital and highly significant contribution to its World Heritage value and has ensured the integrity of its ecosystems and the retention and protection of its heritage values.

It is particularly noted for its wide and balanced representation of eucalypt communities ranging from wet and dry sclerophyll to mallee heathlands, as well as localised swamps, wetlands, and grassland. One hundred and one species of eucalypts (over 14 per cent of the global total) occur in the Greater Blue Mountains. Twelve of these are believed to occur only in the Sydney sandstone region".

The Minister for Infrastructure and Regional Development, Warren Truss MP, has said that

"[the draft Environmental Impact Statement] is a very robust assessment of the environmental, social and economic impacts."

I disagree. The draft EIS does not adequately analyse the impact on this biodiversity of a 24-hour, no curfew airport, sited just 10 kilometres away from the Blue Mountains National Park.

Jet fuel pollution, fine particulates, noise, emergency fuel dumping, as well as the risk of aircraft disaster, all present significant threats to the ongoing status of the World Heritage area.

The purpose of World Heritage listing is to protect areas of outstanding heritage significance from the dynamic social and economic conditions present throughout the world which, if left unchecked, would permanently damage the heritage values of these sites.

Article 4 of the UNESCO World Heritage Convention states:

"Each State Party to this Convention recognizes that the duty of ensuring the identification, protection, conservation, presentation and transmission to future generations of the cultural and natural heritage referred to in Articles 1 and 2 and situated on its territory, belongs primarily to that State. It will do all it can to this end, to the utmost of its own resources and, where appropriate, with any international assistance and co-operation..."

As is well known, between 1999 and 2000, UNESCO repeatedly rejected Australia's proposal to nominate the Blue Mountains for World Heritage listing on the basis of former plans to develop an airport at Badgerys Creek (under consideration by the then Howard government).

UNESCO's specific concerns, prior to listing, were that any proposed airport would impact the heritage values of the Blue Mountains National Park due to fuel emissions, visual intrusion, and aircraft noise (in the range of 70 to 80 decibels) having an adverse impact on the natural quiet of the region.

I am particularly alarmed that in making the political decision to proceed with an airport development at Badgerys Creek, the Federal Government made no effort to notify UNESCO and seek advice from their experts about the potential impacts on the status of the World Heritage listed area. This directly contravenes a stated requirement that parties to the UNESCO World Heritage convention provide advance notice to UNESCO of any significant potential threats, including those arising from their governments' own legislative changes or public works projects, to the heritage values of World Heritage listed sites.

This glaring oversight is evidence of the reckless, negligent approach from the Federal Government that defines their airport project. These specific concerns must be adequately addressed to the satisfaction of experts at UNESCO before further works are undertaken to progress the airport project.

RECOMMENDATION 2: The Federal Government must liaise with UNESCO before proceeding with further planning efforts and must pay attention to the expert advice they provide regarding potential impacts on the Greater Blue Mountains World Heritage Area. No airport development should be permitted to cause negative impacts on the World Heritage values of the Blue Mountains National Park.

Bushfire Risk and Management

There is a complete lack of analysis within the EIS about the airport's operations and the ongoing work of the Rural Fire Service to mitigate the risk of (through Hazard Reduction Burns, for example) and respond to bushfires within the Blue Mountains region.

The proposed arrival path merge point, as outlined in the draft EIS, is sited above the villages of the lower Blue Mountains. It is worth noting that it would be directly above the areas affected by bushfires in October 2013 (Springwood/Winmalee) and November 2014 (Warrimoo/Blaxland). In both instances, aerial firefighting apparatus used water storage at Glenbrook Lagoon and Springwood Country Club to gather water to fight these out of control fires.

The usual practice is for firefighting apparatus to fly at a low altitude between the fireground and a water source, while a control unit flies above and provides logistical instruction as well as air traffic control functions to helicopters and aeroplanes undertaking firefighting activity.

The risk of bushfire in the areas beneath the arrival flight paths is significant, every summer. The draft EIS should have addressed these concerns from the outset. Again, Minister Truss's efforts by media release to placate the community's and the Rural Fire Service's very serious concerns about firefighting capacity should be noted for their inadequacy.

On 19 November 2015, Minister Truss said:

"It's time to pour cold water on the scare campaign that falsely claims a Western Sydney Airport could impact on important back-burning and aerial firefighting operations.

In fact, an airport this close to the Blue Mountains would help firefighting by providing refuelling services and a long runway close to where the aircraft may be needed."

This is political doublespeak because, as Minister Truss knows, the majority of aerial firefighting is conducted by helicopter. Moreover, the Rural Fire Service's DC-10 firefighting plane is based out of RAAF Richmond where it has adequate runway and refuelling facilities within easy reach of potential firegrounds in the Blue Mountains.

Minister Truss goes on to argue in his media release that emergency services aircraft operate alongside commercial flights (on approach to Sydney Airport at Mascot) above firegrounds in the Royal National Park and the Ku-Ring-Gai National Park. This ignores or forgets the fact that arrival flight paths at Kingsford Smith Airport are flexible due to the arrangement of multiple runways, running North-South and East-West.

On the other hand, there appears to be no arrival flight sharing proposed by the Western Sydney Airport draft Environmental Impact Statement (with all arrival flight paths merging above the Blue Mountains), so it is not clear how the flexibility which allows for emergency services aircraft to operate near Kingsford Smith Airport could so readily be exploited at the proposed Western Sydney Airport.

It is not good enough for the proponent of a major project such as this to address such serious concerns with ignorant or wilfully obtuse comments such as those published by Minister Truss. The Blue Mountains community, exposed to significant bushfire risk as it is, needs the expert analysis of Rural Fire Service personnel and air services engineers included in the final Environmental Impact Statement so that the community's concerns about firefighting capacity can be adequately addressed.

Moreover, there is no mention within the EIS of procedures or plans to respond to the dynamic nature of hazard reduction burns.

These concerns cannot be afterthoughts hastily attended to once the airport is built or operational. These concerns need to be quantified, analysed and planned far in advance and in such a way as to allow the expertise of the Rural Fire Service to inform any planning decisions.

RECOMMENDATION 3: The airport EIS must investigate and take advice from Rural Fire Service experts about the impact of hazard reduction burning on airport operations and vice versa. The Federal Government must provide certainty to the community (through regulation or legislation) that airport operations will not interfere in the operation of aerial firefighting activity during bushfire events. This can only be achieved through rigorous consultation with the Rural Fire Service NSW.

Drinking Water Catchment Area

Sydney's drinking water supply, Warragamba Dam, and the water catchment area which supplies it (in particular, Lake Burrangong and the Coxs River) are directly beneath the proposed arrival flight path for 100% of incoming flights.

Not only does this expose our drinking water supply to constant, daily contamination by aircraft overflight, but further exposes our drinking water supply to catastrophic contamination by fuel dumping and the risk of aircraft disaster during the period of heightened crash risk, arrival approach. While fuel dumping above the water catchment area may only very seldom occur, and an aircraft disaster may be a statistical improbability, any risk to Sydney's primary drinking water supply is something which must be avoided.

We already restrict physical access to our drinking water catchment to prevent accidental or malicious contamination of our water. It therefore makes no sense to allow persistent, constant and deliberate pollution of these waterways from aircraft overflight, as well as allow for the ongoing risk of catastrophe from fuel dumping or an airline disaster.

I hold very grave concerns that the proposed flight paths published in the draft EIS (showing a merge point above populated Lower Blue Mountains towns such as Blaxland and Glenbrook) are an ambit claim by the Federal Government, designed to elicit a strong response from community and which may be readily amended to the

satisfaction of concerned residents by moving the merge point 90 – 120 degrees to the south and south west. This would put the arrival flight path merge point directly above the Coxs River, Kings Tableland and Lake Burragorang areas, and further risk our drinking water catchment area beyond the risks already present in the current proposal.

In a speech to NSW Parliament on 12 November 2015, I noted that the draft EIS justifies its often superficial analysis of the impacts of these arriving flight paths and the location of the merge point on the basis that the proposal shows “indicative only” flight paths, and therefore it would be premature to fully investigate their impacts. Setting aside my concern that an Environmental Impact Statement which refuses to state the environmental impacts is a somewhat pointless exercise, I note that in a letter to Mrs Louise Markus MP, Member for Macquarie, on 3 December 2015 (as published on Mrs Markus’s Facebook page) the Minister for Infrastructure and Regional Development, Warren Truss MP, has made it clear that any deviation from the proposed flight paths and merge points would be limited to within 5 kilometres from the published proposal.

In his own words, Minister Truss explains:

“... I am keen to re-examine the point merge [sic] location, if there needs to be one, noting that there appears to be scope to do so without unduly compromising the needs of Defence or existing flight paths operating in the Sydney basin. As it stands, the draft EIS notes that there is scope to adjust the merge point by up to five kilometres from its current indicative position”

This reveals the lie of “indicative only flight paths”, since a deviation of 5 kilometres is for all practical considerations utterly inconsequential and meaningless. On this basis, the final Environmental Impact Statement must adequately and thoroughly investigate and address these concerns.

RECOMMENDATION 4: For a variety of reasons associated with proper planning principles, the Federal Government must investigate and publish more than one set of proposed arrival flight paths – the fact that it has only investigated and published one set indicates that this is a deeply flawed EIS. In any case, the published flight paths above our drinking water catchment area need to be permanently set aside. If there is no other airspace available for arriving aircraft, then airport proponents should consider alternative airport sites.

Lifestyle

The Blue Mountains, for the reasons much of it has been recognised through UNESCO’s World Heritage listing, attracts people who wish to escape the bustling, noisy and dirty urban lifestyle available throughout Western and Inner Sydney.

In recent weeks, I have been contacted by hundreds upon hundreds of local residents who are only just now coming to understand the full impact of the proposed airport on their lifestyle and amenity in the Blue Mountains.

I am concerned that decisions to build this airport have been or are being made by politicians who live in Riverstone (Louise Markus MP), Forestville (Tony Abbott MP), Point Piper (Malcolm Turnbull MP), and Queensland (Warren Truss MP). Not one politician involved in this decision making process is resident in an area set to be impacted by the airport’s operations. It is therefore unsurprising that all involved have been able to dismiss out of hand the concerns of local residents about noise, exacerbated traffic congestion, pollution and inadequate community consultation.

Given this political failure, it is imperative that the concerns of local residents are taken in to account by the Department through its EIS public consultation process.

Much of the debate to date about noise impacts has been a comparative one, drawing links between proposed noise impacts from Western Sydney Airport, and the noise impacts felt in the city or inner suburbs from Kingsford Smith Airport. This forgets a key element in assessing the perceived impact of noise, which is the extant ambient noise against which the new noise is being heard. The ambient noise profile of the inner suburbs cannot be compared to the ambient noise profile of villages and towns in the Blue Mountains. The intrusion of 60 – 70dBa aircraft noise is significantly more apparent when there is nil background noise from traffic or densely populated inner urban housing. According to a significant number of local constituents who have contacted me about this very question, not only do Blue Mountains residents already perceive extant aircraft noise from aircraft overflight arising from Kingsford Smith Airport, but new aircraft noise at lower altitudes will be more intrusive to Blue Mountains residents than equivalent noise is able to be perceived by residents in inner city suburbs beneath aircraft flying at similar altitudes.

Moreover, I note the expert advice contained in the Peer Review of the draft Environmental Impact Statement, prepared by Parsons Brinkerhoff for Western Sydney Regional Organisation of Councils (WSROC), which states:

The report notes aircraft are typically at an altitude of approximately 5000 ft, which corresponds to a noise level on the ground of approximately 55 dB LAmax, consistent with INM predictions for the Airbus A320 or Boeing 737-800. Measurements at other airports have however demonstrated that aircraft at that altitude are generally higher than those predicted using the INM, and accordingly noise levels in practise could be higher.

I am therefore concerned that the draft Environmental Impact Statement has been found by other experts to be presenting an absolute best-case-scenario instead of making all information available to local residents.

As the Parsons Brinkerhoff report notes, assessing the impact of noise in tranquil areas is complex and little established practice exists to take in to account the different perceived impacts of noise intrusion from tranquil areas versus areas with a high level of extant ambient noise.

The Technical Noise Report notes that even noise levels below the best-case-scenario of 55dba could be considered intrusive by recreational visitors to national parks. Therefore it follows that residents living in tranquil areas throughout the Blue Mountains would find the constant noise of aircraft overflight to be similarly intrusive, in a way quite unlike the response from inner city residents to similar noise levels.

This is in part because there is a radical difference between 55dba perceived noise arising from events or activity that are currently prevalent within these tranquil areas and aircraft noise even when it is originating far away enough to be perceived by a local receiver as being +/- 55dba. Nearby birdsong may be heard by a local resident at the same 55dba as might be generated by aircraft overflight; however the degree to which birdsong would be considered intrusive is vastly different to the intrusion caused by aircraft noise. I consider this self-evident; however this is not addressed in the draft Environmental Impact Statement.

As discussed above, the arrival flight paths and their merge point appear to be all but set in stone, but for some limited capacity to move them by up to 5km in one direction or another – an inconsequential change. I note comments from the Minister, as well as within the draft Environmental Impact Statement itself, which indicate that these flight paths have been selected in large part because of considerations about existing flight paths for Kingsford Smith Airport, the RAAF Richmond airport and Defence operations at the Holsworthy facility.

Given declining RAAF activity at Richmond which threatens the viability of the RAAF base as a whole, it is disappointing that this government has not investigated options to revitalise that aviation precinct by operating civilian aircraft alongside military operations as has been done in Newcastle and Canberra. This would mean civilian aircraft capacity could be added to in the Sydney region using existing flight paths and aviation infrastructure.

I note that a significant contributor to the local economy and an important employer in our local region is the tourism industry. While an airport could foreseeably deliver more visitors to our region, in my view for every visitor attracted by improved accessibility, there will be another who upon arrival finds the persistent presence of aircraft overflight to be intrusive and this visitor will likely resolve to not visit again.

I also hold concern for smaller retreat operators, eco-tourism businesses, meditation studios, artists retreats and holiday home owners – all vital to our local economy – whose businesses will be affected by the intrusion of aircraft noise.

While tour coaches (carrying visitors who have arrived via Mascot OR Badgerys Creek) may continue to visit and stay in our major hotels and visit our prominent attractions (both natural or commercial), I hold grave fears for the viability of businesses which rely on day trippers or overnighters from the city. These visitors, being Sydney locals themselves, will know more about the impact of aircraft noise from any new airport than will visitors from overseas and this will affect their decision to visit the Blue Mountains.

RECOMMENDATION 5: As above per ‘Recommendation 4: Drinking Water Catchment Area’, the EIS process must now investigate and publish alternative flight paths to those on exhibition in the draft EIS. The arrival flight path merge point cannot be located above the Blue Mountains World Heritage listed National Park as well as 9 villages and towns in the Blue Mountains area. Arrival flight path noise burdens should be shared as much as possible with different areas nearby the airport, but an overriding concern must be the unique environment and economic activity in the Blue Mountains region, as both are hypersensitive to aircraft noise impacts.

Equity and Curfews

The draft Environmental Impact Statement makes no mention of a curfew for a new airport at Badgerys Creek.

This is for the most part due to the political nature of any decision regarding curfews, though I note that any business case for the operation of a second Sydney Airport (given Kingsford Smith Airport is not yet operating at capacity) would be predicated upon the assumption of a 24/7 operation as this would be the only substantial product differentiation on offer by a new airport in Western Sydney versus the established airport at Mascot.

We must therefore assume that from day 1, any new airport at Badgerys Creek will operate without curfew, 24/7.

In my view, this is fundamentally unjust and wrong. It is not acceptable for the people of Western Sydney and the Blue Mountains to live by one rule while the people of the inner city live by another.

If Kingsford Smith Airport is to retain its curfew in perpetuity, and for any question of curfews in the city to remain a sacred cow of inner city politics, then the new airport at Badgerys Creek must have a curfew too as a basic starting point. That this may jeopardise the business case for the airport being built in the first place is a consideration for the Federal Government to weigh up for themselves, however they must start planning any new airport from the assumption that all residents in Sydney are to be treated equally by government.

It is also unjust that all arriving flight paths are set to converge above villages and towns in the Blue Mountains, while no other communities are impacted by arriving flight paths. That there appears to be absolutely zero sharing of the burden of incoming flights is a gross oversight.

Moreover, there are substantial extant noise impacts from aircraft departing Kingsford Smith Airport experienced by residents in the Blue Mountains each and every day. A substantial proportion of departing flights presently directly overfly the townships of Blue Mountains on approach to the Katoomba Non Directional Beacon. For the reasons referred to in the Parsons Brinkerhoff review of the draft EIS (and referenced above in the Lifestyle section), the noise impacts of these flights are more apparent to residents living in tranquil areas such as the Blue Mountains. While there is little to be done about the noise impact on Blue Mountains residents of flights departing Kingsford Smith Airport, it is important to bear them in mind when considering noise sharing options, and questions of equity, for any new airport at Badgerys Creek.

RECOMMENDATION 6: A curfew such as that which exists at Kingsford Smith Airport **must** be implemented if the airport is to go ahead. If this eliminates the business case for the airport, then proponents of a new airport should consider alternate sites outside the Sydney basin with negligible impacts on local residents.

Inadequacies and Omissions in the EIS

There are significant issues left unaddressed by the EIS, beyond even the problems identified in earlier sections of my submission.

Levels of impact

Throughout its analysis of the proposed airport, the draft EIS makes no prescriptions about levels of acceptable impact. This means that there is no concrete information available to members of the public who would like to consider the proposal that would allow them to properly understand or quantify the worst-case-scenario.

Of particular concern is that while the EIS tries to assess the impacts foreseen by planners and experts today, notably on the environment, it places no hard limits on those impacts when the airport is fully operational.

Accordingly, much of the EIS is mere speculation – around which we are left to interpret the practical implications and political decisions being made about the airport and how they will affect the day to day lives of local residents and the wellbeing of the natural environment.

RECOMMENDATION 7: The next stage of the EIS must improve on the disappointing quality and rigour of its draft stage. Prescriptive limits upon impacts must be introduced to provide the community with certainty around the changes to their lives brought on by the operation of an airport on their doorstep.

Aboriginal Heritage Impacts

I am disappointed to note the brevity with which the EIS handles assessment of impacts upon Aboriginal Heritage.

The draft EIS sets aside concerns for the impact of airport operations on the Aboriginal Heritage values of the Greater Blue Mountains Area with the following dismissive comments (Volume 2, Ch. 24, Page 554):

Operation of the proposed airport would not directly impact sites within the GBMA that have Indigenous heritage values. The only form of indirect impact on cultural heritage values that can be reliably

anticipated by this assessment is the temporary loss of contextual value from the periodic intrusion of low levels of aircraft noise.

Given the peer review of the draft EIS by Parsons Brinkerhoff identifies inadequacies in the assessment of noise impacts across the board, it is clear to me that assessment of impacts on Aboriginal Heritage within the EIS are also likely to be flawed.

RECOMMENDATION 8: The Federal Government must engage specialist Aboriginal Heritage consultants to undertake a complete assessment of the airport's impacts on the Badgerys Creek site AND the impacts on the Greater Blue Mountains area. In doing so, they must engage with the Aboriginal community and ensure their assessment is thorough and informed.

Flight Paths and Airport Operations

There is no transparency in the draft EIS about the determination of flight paths and the Blue Mountains merge point, though from media releases I understand those considerations to be primarily associated with Kingsford Smith Airport, RAAF Richmond, and the Holsworthy Defence facility. Given there is no formal explanation of the presented flight paths, it is perhaps not surprising that the draft EIS neglects to present any alternatives to the Blue Mountains arrival merge point. With a project as complex as this, built over a long period of time, with the expectation that it would operate for many decades to come, there must be at least one alternative set of flight paths that could be employed or even considered, however the draft EIS attempts to have it both ways – on the one hand presenting just one potential arrival flight path and merge point, but saying that it cannot fully investigate the impacts of those flight paths because they are “indicative only”. This is a plainly contradictory position to take.

Moreover, given there is presently no designated ‘Airport Lessee Company’, the assumptions about airport operations in the draft EIS are put forward on the basis of what the Department would pursue if it were to design and build and then operate an airport in its own right. This, however, is by no means a prescriptive set of requirements for any future Airport Lessee Company (which we must assume at the moment will be Sydney Airport Corporation, as they have first right of refusal on any second Sydney Airport as a condition of their purchase of Kingsford Smith Airport from the Federal Government in 2002).

As the draft EIS contains no advice from Sydney Airport Corporation about its preferred operations and there is no regulatory or legislative barrier to a future Lessee redesigning the airport operating plan or associated flight paths (beyond the very opaque process which has led to the production of the indicative flight paths and merge points in the draft EIS), we cannot trust that the airport plan and flight paths detailed in the draft EIS of 2015 will bear any resemblance to the reality of 2025 / 2030.

RECOMMENDATION 9: The Federal Government must introduce certainty for the community that proposals within the EIS will be reflected in 2025 / 2030 once the airport is operational. This must be done by regulation or legislation. Without this certainty, the EIS is meaningless.

Public Transport

There is no consideration of the need for public transport connections operating from the airport on Day 1 of operations. This reveals that the expectation of the Federal Government that the primary method of passenger transit to or from the airport is by private motor vehicle or bus. This will exacerbate existing traffic congestion

throughout the South Western Sydney region, as well as add considerable traffic to the M4, M7, and M5 motorways.

While on the one hand, public transport is primarily a state government matter, as the proponent of the airport development it is not beyond the Federal Government's remit, indeed not beyond the remit of the Department of Infrastructure and Regional Development or its Minister, to also plan and build rail links to key urban and regional hubs such as Penrith, Parramatta, and the Sydney CBD.

Further complicating the draft EIS's analysis of transport matters, in so far as there is any analysis at all, the traffic estimates it relies upon were undertaken in 2011. This data is out of date and irrelevant for an airport proposed to be made operational by 2025.

RECOMMENDATION 10: Broadly speaking, the Federal Government must be more proactive in its financial backing of public transport, however if it must invest its money in a new airport, then it must also fund associated rail transport links. A fresh traffic study must also be undertaken to properly quantify the existing traffic congestion burden, and model predicted impacts of additional traffic arising from an operational airport.

Conclusion

The draft Environmental Impact Statement is inadequate and the political decisions which underpin it are flawed.

An airport proposal which cannot address key environmental and social concerns, such as those raised in this submission, will never receive the support of the communities set to be affected by it.

There is an opportunity for the final Environmental Impact Statement to address these issues and present them for public consultation, however the decision to rush to a public consultation on this draft stage means that much of what may be contained in any final edition of the EIS will be essentially set in stone by the time the public is able to comment on it. Indeed, any comments they do make will likely never be incorporated in to any subsequent revision.

Given the breadth of information not available to the community at this stage of the EIS, it is my view that this process is fundamentally and irretrievably flawed.

No airport proposal should be allowed to put at risk Sydney's drinking water supply or see the potential de-listing of the Blue Mountains from UNESCO's World Heritage register. Nor should local residents in the Blue Mountains bear the brunt of all arriving flights while no other region or community is subjected to such noise. Nor should they live with uncertainty about the efficacy of hazard reduction burns or aerial firefighting activity as a result of a nearby airport. Moreover, it is incumbent upon any airport proponent to also demonstrate how they will handle passenger transit without adversely affecting already congested regional and major roads.

As it stands in its current proposal, detailed in the flawed draft Environmental Impact Statement, I cannot support *this* airport or the impacts it will have on our local community.

If *this* airport is to go ahead in spite of community opposition, then political leadership is necessary from the new Prime Minister to undo the problems created by his predecessor. The reckless haste of the airport announcement by the former Prime Minister, Tony Abbott, is reflected in the patchy and incomplete draft EIS. Instead, we need time, thoughtful investigation of the issues and genuine negotiation with the community.

In preparing my submission to the draft Environmental Impact Statement, I have utilised the advice and expertise of Blue Mountains City Council, Blue Mountains Conservation Society, as well as the Parsons Brinkerhoff Peer Review of the EIS, as prepared on behalf of WSROC.

On behalf of my community, I also enclose 1200 individual submissions which have been delivered to me by local residents. Many hundreds of submissions include extensive additional notes, attachments and enclosures. I expect that each signed submission will be considered and handled by your Department as an individual contribution to the draft Environmental Impact Statement.



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16 December 2015