

# FAIRFIELD CITY COUNCIL SUMMARY OF ISSUES

## SUBMISSION TO THE DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE PROPOSED WESTERN SYDNEY AIRPORT

This document should be read in conjunction with the Council Report and Recommendations of Councils Ordinary Meeting of 8 December 2015, as well as the attached Peer Review Reports.

## Table 1 - Summary of Key Issues

Below is a summary of the key issues, deficiencies, data gaps and inadequacies Fairfield City Council has identified within the draft EIS and recommends being addressed prior to finalisation of the EIS. This should be read in conjunction with the Council Report of 8 December 2015, and the Peer Review Reports undertaken for this project. These Reports are attached.

Environmental issue	Key issues raised
Noise (aircraft overflight)	<ul style="list-style-type: none"> <li>• Assessment based on 2030 scenario which reflects early stage of airport operation only.</li> <li>• The low movement numbers cast doubt over the appropriateness of the 5 year time horizon as the assessment scenario for gaining approval for a major international airport.</li> <li>• Uncertainty around actual flight paths.</li> <li>• Proposed mitigation measures are generic due to uncertainty of flight paths</li> <li>• Outline of mitigation process is not performance driven.</li> <li>• Without a defined airspace you can't have a defined noise mitigation strategy.</li> <li>• Aircraft noise is always going to be a key concern for the community and ensuring protection for residents should be a key priority. The draft EIS provides no assessment of the material impacts of aircraft noise on communities and families and as a result can't offer specific mitigation measures or noise limitations that must be adhered to – precisely what an EIS should do</li> <li>• .</li> <li>• Evaluation between community annoyance and noise exposure. The HRA states no qualitative assessment of annoyance was conducted as part of the study.</li> <li>• The conceptual design did not consider potential noise abatement opportunities, which will form an essential part of the formal airspace design process”.</li> <li>• The airspace management strategy used as the basis for noise modelling is a proof-of concept design. Further work is required to determine actual flight paths.</li> <li>• The draft EIS refers to mitigation related to dwelling acquisition or dwelling insulation upgrades. There is no detail as to how this is to be implemented.</li> <li>• The draft EIS does not refer to the AS 2021 guidance so it is unclear how the various ANEC's should be interpreted when assessing land use impacts.</li> <li>• The draft EIS does not quantify the potential extent of changes to land use controls relative to the measures which have been in place since the original EIS was undertaken in 1985.</li> <li>• The long term cumulative impacts have not been properly quantified or assessed.</li> </ul>

Environmental issue	Key issues raised
<p><b>Noise (aircraft overflight) – (Continued)</b></p>	<ul style="list-style-type: none"> <li>• The National Airports Safeguarding Framework 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 has however not been discussed or assessed in the draft EIS.</li> <li>• Horsley Park and Cecil Park appear to be impacted significantly in the long term during day time, however noise impacts may be felt in the short term in the evenings.</li> <li>• Given the noise modelling is based on indicative concept air traffic management design it is difficult to properly assess the real impacts. Mitigation measures to address noise impacts and their implementation is not properly detailed in the draft EIS.</li> <li>• Further information and assessments are necessary before stakeholders can reach an informed view on the potential scale and significance of aircraft over-flight noise impacts associated with the proposed airport site.</li> <li>• The content and the manner by which the EIS has been developed have created uncertainty in the community. Greater detail is required to provide clarity as to the real impacts on the community.</li> <li>• The process is considered flawed given environmental considerations should be paramount.</li> </ul>
<p><b>Noise (airport ground-based noise and vibration)</b></p>	<ul style="list-style-type: none"> <li>• Type and magnitude of impact, pre and post mitigation has not been included</li> <li>• A single rating background level has been assumed for all receptors, this generalisation has underestimated the magnitude of noise impacts at receptors close to the airport.</li> <li>• Luddenham sensitive receptors were not included in background noise monitoring.</li> <li>• No cumulative noise impact assessment has been considered</li> <li>• The M12 motorway and the realignment of the Northern Rd has been excluded from the assessment regarding operational road traffic noise in Stage 1</li> </ul>
<p><b>European Heritage</b></p>	<ul style="list-style-type: none"> <li>• The EIS does not examine the impact on significant items of heritage, specifically Horsley House, which is a State listed heritage item and is also listed on the National Estate Register.</li> <li>• Unlike contemporary housing, noise attenuation in a significant heritage property is anticipated to be difficult and expensive.</li> <li>• Measures should be put in place to provide mitigation measures to allow the ongoing preservation and residential use of the property.</li> </ul>

## Environmental issue

## Key issues raised

### Community Health and Human Health

- The EIS contains a Health Risk Assessment (HRA) rather than a Health Impact Assessment (HIA). No explanation as to why?
- Perceived health issues not considered
- Social determinants of health have not been considered
- Long term cumulative impacts were not considered.
- This narrow approach does not address the full range of determinants of health and makes no use of the large evidence based on the association between health determinants, particularly social, and health outcomes.
- The narrow approach has been found to be of limited use to policy and decision-makers and a fuller, more comprehensive qualitative and quantitative assessment of health impacts is often called for.
- HIA's are the preferred methodology to ensure development proposals are undertaken in a way that safeguards the health and wellbeing of affected communities, promotes health opportunities, reduces health inequalities and promotes health equity.
- The most significant health impacts/effects/risks are related to changes in air quality, noise and water quality, the level of analysis and detail presented in the is reflective of the potential significance of these descriptors. However, the potential inequality/inequity impacts have not been sufficiently assessed or discussed. This is a significant gap.
- Some of the information is presented in a way that makes it difficult for interested stakeholders to fully understand the scope and scale of the potential health impacts.
- Ecologically sustainable development in relation to health is not considered.
- The draft EIS should assess the health impacts/effects of changes in the full range of environmental and social determinants of health and the potential inequalities/equity issues due to the proposed development. The EIS does not do this effectively.
- Not all unknown variables, assumptions, and limitations are included in the assessment.
- A qualitative analysis and discussion of impacts/risks/effects on vulnerable/sensitive groups and on health inequality/equity issues has not been done.
- There is no discussion of the implication of the distribution of effects for inequality and equity.
- Community feedback and any potential perceptions or concerns of local residents are not discussed.
- Perception effects are different from biological or epidemiological risks, can cause stress and anxiety and should be considered separately from mortality and morbidity effects.
- Mitigation measures are only discussed in passing, they should be presented and explained how and to what extent these measures will mitigate the identified health impacts.
- It is not clear if the cumulative impact assessments were used and examined in the assessment.
- The report needs to present total number of people potentially affected by health outcomes (i.e. not just presented for individual communities).
- The EIS needs to present information for all affected geographic areas not just worst affected area.

## Environmental issue

## Key issues raised

### Community Health and Human Health (continued)

- The EIS needs to present information in formats from which people can easily extract key information.
- The EIS needs consistent measurements of risk and detailing risk according to the community impacted, in terms of geographic areas.
- Describing (qualitatively) the synergistic (combined) health impacts on communities close to the airport.
- Disaggregating the assessment to identify the potential differential health impacts on:
  - population groups (eg younger people, older people, low socio-economic people); and
  - sensitive social infrastructure, such as education and health care facilities.
- The full range of potential significant impacts on health should be assessed and appropriate mitigation measures developed.
- Assessment of the public and community health impacts of the loss of agricultural land, green, open and recreation space.
- Assessment of potential impacts on health caused by perceived risk, stress and anxiety about the airport development.
- Assessment of loss of greenspace and loss of amenity of greenspace and the impact of this on health and wellbeing of current and future generations.
- Detailed information on the likely mix of part-time and full-time, low vs high skill and low vs high paid jobs generated by the airport and the likelihood of jobs being taken up by local communities and unemployed people to assess the quality and uptake of the employment likely to be generated and corresponding health benefits.
- The permanent loss of agricultural land should be considered from a food security, sustainability and public health perspective.
- The potential impacts on housing affordability on health, in particular the impacts on health inequalities resulting from increased housing prices and potential exposure of lower SES populations to residential areas with higher noise levels.
- Impacts on communities (eg social capital, community severance, social cohesion, community identity) due to noise and increases in traffic.
- Perception effects from noise and air quality – different from biological or epidemiological risks and can cause stress and anxiety – should be considered separately from mortality and morbidity effects.
- The potential for an increase in road traffic incidents, accidents and congestion including impacts on physical health and communities.
- The residual impact on communities resulting from compulsory relocations.
- An outline of proposed health impact mitigation measures should be presented and detailed. They are currently generic and uncertain.
- The lack of a night time curfew will impact on the residents of Horsley Park.
- The health outcomes from the long term development only exacerbate the health issues to not only the residents of Horsley Park but also parts of Cecil Park and possibly further.

## Environmental issue

## Key issues raised

### Aviation planning

- No real visibility in draft EIS of how flight paths were determined
- No presentation of alternatives
- No certainty over final outcome
- No consideration of point merge – impacts on Blaxland
- No justification has been provided for the flight paths suggested in the draft Airport Plan. The EIS does not explain why this design was chosen and does not indicate whether any further options were considered or modelled – because no real attempt has been made to model actual working flight paths, the EIS cannot address the key issues it is designed to analyse i.e. the impact on the environment and the community and how this can be mitigated.
- The EIS is based on indicative flight paths (or airspace architecture).
- That the flight paths presented in the EIS were determined based solely on operational and aviation safety considerations and not a consideration to minimising noise impacts.
- Location of the merge point is indicative until the flight paths are finalised. Areas affected by aircraft noise associated with this merge point may change as this is also only indicative.
- Lack of consideration of alternative flight paths including greater consideration of Kingsford Smith, Camden, Richmond and Bankstown airports. In particular it is thought that the impacts on Bankstown airport have not been fully addressed.
- The draft EIS lacks sufficient detail in airspace architecture including a detailed description as what the underlying principles were, how was it developed and any alternatives which were considered.
- The draft EIS did not look at any scenarios beyond the normal/scheduled operation of the airport such as queuing in the event of unscheduled interruption.
- Further analysis of the proposed fleet mix is required. It is not considered suitable to adopt the fleet mix used from Kingsford Smith Airport (KSA) and that further analysis of the preferred fleet mix at the Western Sydney Airport should be undertaken.
- A detailed discussion to determine whether a curfew is required. The Independent Peer Review (IPR) consultants recognise that this is a substantial political issue, and 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) or not.

## Environmental issue

## Key issues raised

### Aviation Planning (continued)

The information on airspace architecture presented in the does not meet requirements given the following:

- **Airspace, OLS and PANS-OPS** – the following impacts are identified which are either unresolved or which require further clarification:
  - a. The proposed airspace architecture is 'indicative' and has not been rigorously tested. The draft EIS proposes another airspace model is tested closer to commencement of operations.
  - b. The modelling indicates several flight paths over water storages, such as Warragamba Dam and Prospect Reservoir. Other flight paths traverse the Blue Mountains National Park. The environmental impact is unclear.
  - c. Feasible alternatives have not been provided. This is particularly important in consideration of concentration of approaching traffic over the township of Blaxland for the Stage 1 development and departure tracks.
  - d. There is no consideration of community sentiment regarding changes to flight paths, proposed in the draft EIS, when the Airport operates with 2 runways.
  - e. An alternative Stage 1 airspace model, based on the long term proposal but operating with a single runway, is not tested.
  - f. Except for SKF, flight paths for aerodromes, affected by the Western Sydney Airport are not evaluated.
  - g. The draft EIS suggests that Western Sydney Airport will detrimentally affect the operations at Bankstown and Camden, and affect Richmond (military). The environmental impact is not quantified.
  - h. Re-location of light aircraft traffic to other airports, the definition of new training airspace and consequent environmental impact, is not assessed.
- There is a degree of variability in the forecasts and demand information used in the draft EIS and draft Airport Plan. In addition, the forecast passenger loads per aircraft for Western Sydney Airport as presented in the draft EIS appear to be high i.e. more planes than predicted.
- It is unclear what benchmarks or planning decisions sit behind the 1900m runway separation shown for Western Sydney and it is noted that other airports in Australasia are proposing wider runway separation. The widening of the runway separation would have a greater impact on the Fairfield LGA.
- There is inconsistency issues in terms of the base set of planning parameters used in developing the airport. (number of aircraft stands).
- Bird and bat strike risk for the airport is low. The assessment is preliminary. The fieldwork is limited to one set of surveys, therefore seasonal/temporal changes cannot be identified. Various sites within the study area were also not assessed due to limitations in access.
- There is no analysis presented on fuel dumping in the draft EIS. It is concluded that the likelihood to cause significant environmental or social impacts is low. Further clarification is needed.

Environmental issue	Key issues raised
Aviation Planning (Continued)	<p>Matters that need to be included:</p> <ol style="list-style-type: none"> <li>1. It is considered that alternative scenarios should be developed to determine an acceptable overall model for airspace.</li> <li>2. Environmental impact on selection of flight paths needs to be included to minimise impacts on the community.</li> <li>3. There is no consideration of community acceptance of change to aircraft flight path and altitudes. The effect of noise is not restricted solely to loudness, but also to perception, and this has not been tested. Metrics of noise evaluation should be considered for the proposed paths.</li> <li>4. Height restrictions on buildings not located in the immediate vicinity of the airport. Locations such as Fairfield, the Blue Mountains Council region, Camden, Penrith, Parramatta etc are potentially affected by the airport at Western Sydney and should be evaluated.</li> <li>5. Noise abatement procedures are promulgated for major airports around Australia. They define modes of operation at certain times to reduce the effect on surrounding population centres. No consideration has been given to operational management to minimise public impact.</li> </ol>
Surface transport and access	<ul style="list-style-type: none"> <li>• STM3 model has not been effectively calibrated and validated as the model is still in development with TfNSW</li> <li>• No traffic intersection modelling undertaken.</li> <li>• Did not consider assessment of rail.</li> <li>• Traffic estimate is based on 2011 which may be an underestimate as it does not include recent land use developments.</li> <li>• Traffic generation (outside of air cargo) is unknown and no consideration made for passengers transferring within the airport.</li> <li>• No detailed modelling of traffic and transport was conducted for this project as is common practice for other projects such as the WestConnex, North West Rail Link and South West Rail Link.</li> <li>• The draft EIS does not adequately consider the cumulative effect of projects associated with the Western Sydney Airport such as the Northern Road upgrades, the recently announced South West Priority Area, or the M9 Orbital on traffic congestion, noise or air pollution – it considers the airport in isolation, not real world conditions.</li> <li>• The EIS assumes a rail service supporting the airport at some point in time but does not indicate when, nor does it consider the cumulative adverse effects (access and amenity) to local communities without the rail line being built.</li> <li>• Difficult to confirm validity of impacts with confidence. Following information required: <ol style="list-style-type: none"> <li>a. Vehicle travel time comparison (modelling);</li> <li>b. Intersection performance (modelling);</li> <li>c. Intersection layout requirements (modelling);</li> <li>d. Implementation of Construction Traffic Management Plan (CTMP) to mitigate impacts</li> </ol> </li> </ul>

**Environmental issue****Key issues raised****Surface transport and access  
(continued)**

Limitations of Traffic/Transport Assessment short and /or long term include:

- Gaps in and/or lack of supportive information for:
  - a. Explicit future land use assumptions in the region.
  - b. Potential land use within the Airport precinct that has not been accounted for.
  - c. Airport related freight generation (above and beyond air cargo tonnage).
- Methodologies that measure traffic impacts that may not be considered industry best practice, including:
  - a. Intersection modelling not undertaken
- Sections of analysis and commentary that may not be considered industry best practice, including:
  - a. Quantifiable values of road capacity (volume to capacity)
  - b. Vehicle travel time comparisons on major road links, 'with' and 'without' the Airport not provided
  - c. Intersection performance values, 'with' and 'without' the Airport, are not provided (intersection modelling not undertaken)
  - d. Intersection layouts (and subsequent potential land acquisition impacts) required to accommodate future Airport traffic are not provided or not described.
- Most significantly the project does not envisage the construction of rail connection to the airport. It is considered the development of rail as part of Stage 1 of the project is critical.
- Key issues with the Airport Access Drive identified various fail predictions.
- The Northern Road, M7, Elizabeth Drive, Mamre Road, Luddenham Drive reach capacity with the Airport operations before and leading up to 2063. Limited assessment on strategic measures for these roads.
- Insufficient information has been provided to determine how air passenger demand would access and egress the Airport beyond 2050 (when the Airport Access Road reaches capacity).
- Further detailed transport network planning including road and rail network planning is required.
- The draft EIS also lacks in detail regarding public transport and opportunities which should be pursued as part of the proposed development.
- A key opportunity that should be considered is the development of a dedicated bus transit way incorporating the proposed M12 Motorway or Elizabeth Drive with linkages to the Liverpool – Parramatta Bus Transit way at Bonnyrigg.

**Transportation of Aviation Fuels:**

- Absent from the EIS is a comprehensive risk assessment of the transportation of aviation fuels.
- It is estimated at the commencement of operations there will be approximately 43 B-Double Truck movements per day. If no alternative methods are implemented these B-Double truck movements may escalate to over 110 per day.
- No assessment of proposed forms of transportation, transportation routes, transportation risk management plans, reflection of communities that may be affected.
- No assessment of potential.

Environmental issue	Key issues raised
Biodiversity and offset strategy	<ul style="list-style-type: none"> <li>• Offset package has not been prepared and residual ecological risks have not been discussed</li> <li>• Mitigation measures are limited</li> <li>• Difficult to assess the biodiversity value of the site for the long term development.</li> </ul>
Surface water and groundwater	<ul style="list-style-type: none"> <li>• Duncan Creek and its tributaries have not been modelled to allow definition of baseline and hydraulic impacts</li> <li>• Draft EIS appears to dismiss any relevance of increased pollutant loads on the receiving environment</li> <li>• Groundwater assessment lacks qualification of data, no baseline time-series data collected</li> <li>• Two residual risks for groundwater were identified; soil and subsurface contamination from spill/release of chemical or contaminants and impact on groundwater dependant ecosystems from reduced water supply.</li> </ul>
Social and Economic Impact	<ul style="list-style-type: none"> <li>• Balance of discussion on impacts – strong focus on economic benefits rather than a balanced discussion.</li> <li>• Strong focus on regional benefits not local impacts.</li> <li>• Many potential issues are stated with little assessment of their implications or level of significance or duration.</li> <li>• No discussion on how mitigation measures will be co-ordinated or resourced or who the key accountability falls with.</li> <li>• Claims being made by Commonwealth about economic generation and job creation have not been explicitly tested in the draft EIS.</li> <li>• The draft EIS does not describe the economic or social impacts of any transfer of activity from other areas in Sydney or Australia.</li> <li>• Claims being made by the Commonwealth Government about economic generation and job creation have not been explicitly tested in the draft EIS. Potential adverse impacts are briefly stated with little assessment of their implications or level of significance.</li> <li>• Social determinants of health have not been considered. Eg. equitable access to employment and impacts on the amenity of local communities because of traffic generation associated with the airport and the surrounding enterprise precinct.</li> <li>• No discussion of economic or social implications of this transfer of economic activity from other areas in Sydney or Australia.</li> <li>• Limited references to local issues and the impact on local communities which will give rise to greater community angst in understanding the duration and severity of impacts.</li> </ul>

## Environmental issue

## Key issues raised

### Social and Economic Impact (continued)

- The EIS is lacking in addressing of stakeholder concerns.
- Greater discussion of mitigation measures and implementation needed. Needs to be undertaken through greater consultation. Mitigation measures need to be examined through the life of the airport short/medium and long term. Strategies need to be implemented to ensure impacts are measured, assessed and controlled. Mitigation measures need to be reviewed and implemented accordingly through the life of the development to address community impacts.
- Concerns regarding validity of statements, assumptions and claims within the draft EIS without any independent modelling or testing of assumptions. Economic generation and job creation have not been explicitly tested in the EIS.

Assessment gaps identified include:

- How community health such as noise is impacted;
- How social cohesion and cultural connections impacted by physical airport;
- How urbanisation impacts upon locals in a rural setting and their values;
- How housing, facilities and services and the relocation of people are impacted
- How existing jobs and business relocations that are impacted are addressed;
- How the degree and duration of construction works will impact residents;
- Congestion impacts on businesses reliant upon M4, M5, M7 and Hume Hwy;
- Impacts upon local businesses during construction and operational phases;
- Assessment of impact on operation of Western Sydney Employment Lands(WSEL);
- Impact upon the existing centres in the south west;
- Impact upon business parks in South West ;
- Impact of 845,000sqm of additional industrial floor space in WSEL;
- Assess social infrastructure impact and demand for 4,400 to 27,000 people.

The following is recommended:

- Greater assessment of potential social and economic impacts to communities;
- More balanced discussion of costs and benefits;
- Greater reference to the likely adverse impacts to local communities;
- Summary consultation paper be prepared and made available;
- Review of parameters/ ranges of assessment of longer term impacts needs to be undertaken in light of the information gaps identified;
- Identification of the main body responsible for managing and mitigating longer term impacts and risks over time, or how the mitigation framework will be managed, so that the coordination and resources are in place to manage specific impacts associated with Western Sydney Airport.

Environmental issue	Key issues raised
<p><b>Greater Blue Mountains</b></p>	<ul style="list-style-type: none"> <li>• A detailed assessment of significance under the Biodiversity Assessment for the Blue Mountains World Heritage Area has been deferred until a 'multidisciplinary workshop' is held to identify and assess potential impacts.</li> <li>• Limited assessment of wilderness value and high sensitivity</li> <li>• Noise levels predicted to be relatively low (below 50- 55dB LAmax) however for a natural landscape is prediction is not justified and many impact the amenity values.</li> <li>• The EIS' conclusion that there would be low noise impact on the Greater Blue Mountains World Heritage Area is not adequately justified and does not consider the value of the natural soundscape to the community, and the region's significant tourism economy.</li> </ul>
<p><b>Air Quality (Local and Regional) and Greenhouse Gas (GHG)</b></p>	<ul style="list-style-type: none"> <li>• Local air quality assessment has several long term exceedances NO<sub>2</sub>, formaldehyde, PM<sub>2.5</sub> and PM<sub>10</sub></li> <li>• Effectiveness of proposed mitigation measures to achieve compliance was not quantified.</li> <li>• GHG emissions relatively small</li> <li>• Stage 1 assessment is acceptable</li> <li>• Ozone concentration significantly above allowable increment for longer term development.</li> <li>• Major concern that critical assumptions (including input and output files) that underpin the air quality assessment information was not included in the EIS. The provision of such information is a routine expectation and is a minimum requirement of the NSW Environment Protection Authority (EPA) for such studies.</li> <li>• Overall significant uncertainty remains in regard to the findings for air quality issues compromising the adequacy and level of confidence the community can have in relation to this aspect of the EIS.</li> <li>• The air quality study did not adequately address the implications for sensitive receptors in the area surrounding the proposed airport as it:             <ol style="list-style-type: none"> <li>a. Failed to identify all sensitive receptors;</li> <li>b. Failed to identify a representative subset of sensitive receptors - whilst a small subset of sensitive receptors was identified, the subset does not appear to be representative of potential air quality impacts at all existing locations of sensitive receptors;</li> <li>c. Did not identify future sensitive receptors; and</li> <li>d. Incorrectly classified community receptors separately and as having a lesser importance than residential receptors. Community receptors included various land-uses such as schools, parks, childcare facilities, churches and shopping centres.</li> <li>e. Does not include an outline or clarification of measures that would be required to mitigate air quality impacts on sensitive receptors. This includes the question of whether acquisition of these properties would be required.</li> </ol> </li> </ul>

Environmental issue	Key issues raised
Air Quality (Local and Regional) and Greenhouse Gas (GHG) – (continued)	<ul style="list-style-type: none"> <li>• The air quality assessment of the Longer Term Development is speculative at best and does not provide a sufficiently robust basis to support approval of the Longer Term Development at this stage.</li> <li>• The assessment has underestimated the potential impact of the development by a considerable margin.</li> <li>• The impact on future development potential in the South West has not been considered.</li> <li>• No cumulative assessment has been undertaken on the overall potential impact on future communities in the South West.</li> </ul>
General	<ul style="list-style-type: none"> <li>• <b>Timing</b> – It is advised the EIS was developed in in eight months. This period of time for such a complex project appears deficient and has result in poor outcomes. The most obvious of these poor outcomes is that it is clear that the rigour required for assessing such a critical project has been sacrificed in the name of expediency.</li> <li>• <b>Timing</b> – The exhibition period of 60 days was short given the complexity of the project and the scale of documentation that needed to be reviewed, analysed, presented to stakeholders, write reports and provide properly informed submissions.</li> <li>• <b>Raw Data</b> - Confidence in the EIS is compromised because the raw data on which conclusions are based was not made available to the independent review team.</li> <li>• <b>Uncertainty</b> - Disappointment at the lack of certainty offered by the draft EIS on key issues such as aircraft noise, flight paths, traffic, transport, and the environment.</li> <li>• <b>Uncertainty</b> – An operator has not being determined with regards to the development and operations of the airport. The EIS appears to be based on indicative concept design, and not on a specific airport design and operations. Whilst this provides flexibility to a future airport operator it has created uncertainty to the community with regards to specifically determining what the true impacts really are.</li> <li>• <b>EIS Guidelines</b> - The peer review found that the draft EIS did not always adhere to EIS Guidelines, did not conform to best practice in many areas, lacked detailed modelling and contained information gaps for many key assumptions.</li> <li>• <b>Cumulative Effect</b> - The draft EIS does not adequately consider the cumulative effect of projects associated with the Western Sydney Airport.</li> <li>• <b>Deficiencies</b> - An objective assessment of the Draft EIS can only conclude that the current Draft demonstrably fails to fulfil the Government's own requirements, as outlined in the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act), for a well-informed and comprehensive document.</li> </ul>

## Table 2 - Summary of Compliance with EIS Guidelines

Below is a summary of the key issues, deficiencies, data gaps and inadequacies Fairfield City Council has identified which it considers make the draft EIS non-compliant with the EIS Guidelines. It is recommended these items, in conjunction with the issues outlined in Table 1, the Council Report, and accompanying Peer Review Reports, need to be addresses prior to finalisation of the EIS.

Comments	
<b>Summary</b>	<p>The following EIS guidelines were not adequately addressed by the Draft EIS to varying degrees.</p> <ul style="list-style-type: none"> <li>• It should contain sufficient information to avoid the need to search out previous or supplementary reports.</li> <li>• The level of analysis and detail in the EIS should reflect the level of significance of the expected impacts on the environment. Any and all unknown variables or assumptions made in the assessment must be clearly stated and discussed.</li> <li>• The EIS should be written so that any conclusions reached can be independently assessed.</li> <li>• Any feasible alternatives to the action to the extent reasonably practicable, including:               <ul style="list-style-type: none"> <li>a. if relevant, the alternative of taking no action;</li> <li>b. a comparative description of the impacts of each alternative on the matters of national environmental significance and other matters protected by controlling provisions of Part 3 of the EPBC Act for the action, and</li> <li>c. sufficient detail to make clear why any alternative is preferred to another.</li> </ul> </li> </ul> <p>Short, medium and long-term advantages and disadvantages of the options should be discussed.</p> <ul style="list-style-type: none"> <li>• The EIS should identify and address cumulative impacts, where potential project impacts are in addition to existing impacts of other activities (including known potential future expansions or developments by the proponent and other proponents in the region and vicinity).</li> <li>• The EIS must include specific and detailed descriptions of the proposed avoidance and mitigation measures based on best available practices. This must include the following elements :</li> </ul> <p>A consolidated list of mitigation measures proposed to be undertaken to prevent, minimise or compensate for the relevant impacts of the action, including:</p> <ul style="list-style-type: none"> <li>a. a detailed description of proposed measures;</li> <li>b. assessment of the expected or predicted effectiveness of the mitigation measures;</li> <li>c. any statutory or policy basis for the mitigation measures; and</li> <li>d. the likely cost of the mitigation measures</li> </ul> <p>The general advice provided in the guidelines recommends any additional supporting documentation and studies, reports or literature not normally available to the public from which the information has been extracted be made available at appropriate locations during the period of public exhibition. <b>Despite WSROC's formal request to DIRD for specific data/modelling this data was not made available during the public exhibition period.</b></p>

<p><b>General Comments</b></p>	<p>The following issues were identified:</p> <ul style="list-style-type: none"> <li>• The EIS does not fully consider all the impacts on the environment during this period as it uses indicative flight paths. The long term environmental impacts (beyond 2030) are unclear. All impacts beyond 2030 are not known and do not form part of the works to be assessed under stage 1 of the EIS and draft Airport Plan.</li> <li>• Greater discussion could be provided on the impacts of other projects in the region including significant state infrastructure (roads, rail, water, sewer etc) and urban development projects (WSEA, WS Priority Growth Areas etc).</li> <li>• Greater detail on about feasible alternatives, especially in relation to airspace planning and the short, medium and long term advantages and impacts of the options.</li> <li>• Not all sensitive receivers have been considered as part of the environmental evaluation.</li> <li>• A key concern of the EIS is the description of impacts and residual impacts. As the airspace planning is based on indicative flight paths a detailed assessment of the nature and extent of likely short-term and long-term relevant impacts cannot be undertaken with any certainty. Prior to determination of the EIS greater certainty around airspace planning is required so a more comprehensive assessment of impacts regarding noise, air quality and health can be undertaken.</li> <li>• A detailed description of mitigation measures and their expected effectiveness has not been provided.</li> <li>• Given the uncertainty surrounding the airspace planning and indicative flight paths a more precautionary approach is recommended.</li> <li>• Strong focus on economic benefits of WSA in EIS, needing more balance in economic and social costs</li> <li>• Previous community issues and concerns were inadequately or not assessed and addressed.</li> <li>• The EIS does not provide a cost benefit analysis in accordance with Australian Treasury Guidelines.</li> <li>• Modest over estimation of jobs within proposed business park based on benchmark occupancy ratios.</li> <li>• Strong EIS focus on regional economic impacts, with a gap on local and economic and social impacts.</li> </ul>
<p><b>General content</b></p>	<p>Volume 1, Section 8 described an EIS summary report which was to have been prepared to assist the general public to understand the key issues of the draft EIS without having to read.</p> <p>The draft EIS seeks approval only for the construction and operation of the Western Sydney Airport until 2030. The draft EIS doesn't fully consider all the impacts on the environment during this period as it uses indicative flight paths. The long term environmental impacts (beyond 2030) are also unclear.</p>
<p><b>Format and style</b></p>	<p>The draft EIS is generally compliant with the format and style required.</p> <p>It would be useful to have an overall table of contents at the start of each volume. The draft EIS only has a table of contents for each Volume which makes it difficult to find specific information across the four volumes.</p>
<p><b>General information</b></p>	<p>This section is generally compliant however, more discussion could be made around how the action relates to other actions in the region, including significant state road and rail projects and urban development projects and their associated impacts.</p>

<b>Description of the action</b>	This section is generally compliant. The inclusion and description of development beyond 2030 is at times confusing for the reader as not all impacts are known and it does not form part of the works to be assessed under Stage 1 of the draft EIS or the draft airport plan.
<b>Feasible alternatives</b>	More details could be provided about the feasible alternatives, especially in relation to airspace planning and the short, medium and long term advantages and disadvantages of the options.
<b>Description of the environment</b>	The description of the environment is generally compliant however, it is noted that not all sensitive receivers have been considered.
<b>Relevant impacts</b>	<p>A key concern of the draft EIS is the description of impacts and residual impacts. As the airspace planning is based on indicative flight paths a detailed assessment of the nature and extent of likely short-term and long-term relevant impacts is not able to be undertaken with any certainty.</p> <p>It is recommended that prior to the determination of the EIS and airport plan more certainty is provided around airspace planning so a more robust assessment of impacts such as noise, air quality and health can be undertaken.</p>
<b>Avoidance and mitigation measures</b>	A consolidated list of mitigation measures has been provided in section 28.4 of the draft EIS however a detailed description of the expected or predicted effectiveness has not been included. Refer to section 3.3 of the Peer Review report for more detail.
<b>Residual impacts and offsets</b>	The residual impacts and offsets are not clearly defined or summarised in the draft EIS and are scattered throughout Volume 2. This does not give the community any certainty as to the predicted short and long term impacts. As described in section 4.9 and Appendix I of the Peer Review report, a Biodiversity Offset package has not been formalised.
<b>Environmental record of person(s) proposing to take the action</b>	The draft EIS has adequately addressed this component.
<b>Other approvals and conditions</b>	The draft EIS has adequately addressed this component.
<b>Economic and social matters</b>	Refer to Section 4.6 of the Peer review report.
<b>Information sources provided in the EIS</b>	The draft EIS has adequately addressed this component.
<b>Conclusion</b>	This section of the draft EIS generally complies however given the uncertainty surrounding the airspace planning and indicative flight paths a more precautionary approach is recommended in section 29.5 – Consideration of the principles of ecologically sustainable development.