16 December 2015

Department of Infrastructure and Regional Development
Western Sydney Airport Submission
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Planning Institute of Australia
Submission on Western Sydney Airport (WSA) Environmental Impact Statement (EIS).

The NSW Division of the Planning Institute of Australia (PIA NSW) welcomes the opportunity to provide comments on the Western Sydney Airport (WSA) Environmental Impact Statement (EIS).

PIA represents members with a depth of knowledge on urban, land use and transport planning. PIA supports integrated land use and transport planning which acknowledges that transport and development are not two separate things but two facets of the same challenge (i.e. transport is land use planning). There should be an integrated planning and decision making framework that considers cost effective and efficient and sustainable movement of people and freight, and a focus to reduce car dependency and subsequent emissions.

As PIA noted in their submission to NSW Long Term Transport Master Plan Discussion Paper 2012 “Of all the transport projects under consideration for Sydney, the location of a Second Airport would be expected to have the greatest single impact on the siting of new transport corridors and nodes and new industrial and commercial growth areas”. The NSW Long Term Transport Plan could not rely on the future provision of WSA and therefore did not include WSA as a land use, leaving the plan partially compromised as a blueprint for transport in Western Sydney.

The subsequent commitment of the Australian Government to the WSA at Badgerys Creek has increased the certainty of the proposed WSA project. However the PIA is concerned that the WSA project be more fully tested in the context of local, regional and state development.

PIA is generally supportive of the EIS process methodology and reporting available on the website, augmented by PIA representatives’ attendance at an EIS briefing session provided on 20 October 2015 in Parramatta (Mr. Peter Robertson, Manager Western Sydney, Australian Government Department of Infrastructure and Development; Mr. David Chubb, Project Manager, GHD EIS Team).

PIA wishes to highlight the following issues that we believe require further analysis and consideration.
**EIS Process**

The EIS process is intended to test the environmental impact of a specified project. In this case, an airport project defined initially for 10 million passengers per year with no rail link installed. However, sound transport and land use planning expects the future plan to be considered in the context of a wider plan over a wider area.

The decision on whether to provide a rail service in the near term should be influenced by the broader development objectives, and is an enabler over a much wider area. For example the current massive development of Green Square and Mascot would not have been possible without a rail link, and wider network benefits across Sydney’s rail network.

**Future of WSA and Western Sydney**

A key issue is what the community wants from transport infrastructure that includes WSA:

- An air transport hub
- A jobs focus
- An interchange for the Sydney region, broader NSW region and NSW regional cities
- A national focus for transport including Melbourne, Canberra and Brisbane connectivity
- An international gateway to Australia
- A local airport for Western Sydney
- A satellite airport operated to complement KSA
- A combination of the above.

Land use scenarios presented in the EIS do not include the effect of fast rail in decentralising population growth from Sydney to a collection of existing regional centres. Many international airports have both long distance and local rail services, plus motorways. These questions need to be discussed before we can reasonably plan and choose the best transport infrastructure, rail routes and technology to support WSA.

The proposal is that WSA will operate 24 hours per day without a curfew. The new WSA should reduce the high-noise flight paths going to and from the Sydney Airport (SA)/ Kingsford Smith Airport). PIA supports the reduction in flight paths particularly over Sydney’s inner west, and the use of the east-west runways of Sydney Airport (SA). There would need to be a review of WSA flight paths over the lower southern the Blue Mountains area, shifting further west and south from the north-west.

AS2021 is a nationally adopted standard, recently reviewed and updated, and should be the sole tool to be used for statutory land use planning in the vicinity of the airport and the EIS should clearly and unambiguously acknowledge this. PIA has supported the adoption of AS2021 as the standard tool.

To the extent that the EIS suggests the use of metrics other than AS2021 for the determination of land use outcomes in the vicinity of the airport then it should assess the social and economic impact of the use of the alternative metrics, particularly with regard to the impact on housing supply and price.

If the approaches proposed in the EIS are accepted then this will lead to a state of permanent confusion with regard to land use planning around Badgerys Creek, consequent delay and legal processes, and the potential sterilisation of many square kilometres of land that is well suited to residential development. Together this will further exacerbate the already dire situation with regard to the supply of affordable housing in the Sydney region. It is a broadly acknowledged fact that housing price rises are largely due to constraints on land supply and housing supply is at least as serious an issue for Sydney as is the need for a second airport.
Statutory land use planning in the vicinity of the airport should remain within existing local and state government planning regimes, as is the case with every other airport in Australia; there is no need and indeed considerable "red tape" implications if the Commonwealth becomes involved in land use planning outside the airport boundary.

**Multi-modal Transport Planning**

The Outer Sydney Orbital (OSO) is an identified outer north-south multi-modal corridor for a future motorway, freight rail and where practical, passenger rail, according to the NSW Long Term Transport Master Plan. The corridor is preserved for meeting the transport demand from the Central Coast to Western Sydney to Wollongong. Ultimately the corridor will provide increased capacity for the road network to improve accessibility to housing and employment opportunities in Greater Western Sydney. The corridor is also expected to provide a future freight rail connection from Port Kembla to the T2 South Line, to the T1 Western Line and the Northern Line.

Transport for NSW has released the corridor preservation study for “Outer Sydney Orbital and the Bells Line of Road to Castlereagh Connection South West Rail Link Extension”, and is preparing to shortlist the options. This work must integrate with the WSA project.

**Preconceived Choice of Transport Technology**

The preconceived choice of technology and assumptions made will inform the mode, route and the interchanges, such as:

- Extension of existing heavy rail with 400m radius and stations 300m long over one kilometre apart; extension of the Bankstown line metro with tighter turns and steeper grades and more frequent stations; or
- Regional rail to Bathurst and further west with 1000m radius curves and widely spaced stations; or
- Fast train to Central Sydney with few stops perhaps at Liverpool, Parramatta, probably with expensive tunneling in inner Sydney; or
- Very Fast Train with curve radii of 3 kilometres and one station over a kilometre long per city.

The supply of car parking at the airport will be a key modal and financial issue for the operator of the airport. Early cost effective and plentiful parking may undermine the business case for early rail. Indeed the EIS summary booklet shows a Western Sydney Infrastructure Plan (page 13) with only road upgrades. One of the design assumptions in the EIS scheme is mode split: car parking for 12,000 cars and no rail. This is an important consideration because new commuter methods and new technology such as Uber and driverless cars may drastically reduce the demand for car parking regardless of the mode split. Research also suggests that new airport-related industries do not need to be on-site at the airport, but are better placed within 20 - 30 minutes of the airport.

**Operation and management**

PIA understands that the Sydney Airport Group has a right to develop and operate the proposed airport when the EIS for the initial stage of WSA has been completed and the Government approves the project. Sydney Airport Group has four to nine months to decide to accept or decline the project. The stage one EIS requires provision for a future transport corridor/ rail line and station box, but no legal requirement for longer term action or to develop this. However, we understand from a response to our question at the above-mentioned briefing, that developers of the airport will not have a right to preclude a rail link by others. This appears important because
the rail link is likely to increase air patronage but it may reduce the major operator income from the airport car park.

Other Issues

Train links to the planned new airport at Badgerys Creek will be the focus of a scoping study into transport projects in Western Sydney. The study, jointly announced by the Federal and New South Wales Governments, will cost $2 million and take one year to complete. This study is welcomed and the PIA looks forward to an opportunity to participate. It will not however fast-track the delivery of a rail line to Badgerys Creek airport, with the Federal Government maintaining there is no need for a rail line when the airport first opens to passengers in 2025.

Matters for urgent consideration should also include wider effects such as regional development controls. There is a risk of the airport becoming an island of development under the Federal Government and private control that does not maximize benefits for NSW. In summary, the WSA proposal should be tested against the broader planning objectives of the NSW Government. Proper planning processes can optimise benefits to all parties.

PIA NSW would be pleased to discuss any aspect of the points raised in the Submission with the relevant agencies and welcomes ongoing engagement. Contact with the Institute in the first instance should be via the NSW Executive Officer at nswmanager@planning.org.au or phone 02 8904 1011.

Yours Sincerely

Marjorie Ferguson MPIA CPP
NSW President
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