

14 August 2015

Ms Carolyn McNally
Secretary
Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

Via email: david.mooney@planning.nsw.gov.au

Dear Ms McNally

Re: Eastern Creek Energy from Waste Facility

I am writing to you about the application to construct and operate an Energy from Waste Facility at Eastern Creek (the facility) and, in particular, the implications it may have for the proposed Western Sydney Airport (WSA).

The site of the proposed facility is approximately 12 km to the north-east of the WSA site at Badgerys Creek, and is close to being aligned with the airport's two proposed runways. As such, it is located in an area that will almost certainly be affected by the airspace protection surfaces necessary for WSA to be able to operate safely and efficiently.

Sydney Airport has viewed the proponent's April 2015 environmental impact statement (the EIS), in which an initial response is provided to submissions received from agencies and other stakeholders. We particularly note the response to the 16 March 2015 submission made by the Western Sydney Unit in the Department of Infrastructure and Regional Development (DIRD), the Commonwealth agency responsible for the policy and regulatory framework for Australian airports and the aviation industry, including the proposed WSA. Sydney Airport supports DIRD's submission.

In its submission, DIRD makes a number of important points, including that:

- The development of the facility needs to take into account potential impacts on the operations of the proposed WSA, including obstacles to aircraft flying overhead and the possibility that the plume from the stacks may pose a safety hazard to aircraft
- Any environmental or planning assessments associated with the facility should have regard to the National Airports Safeguarding Framework (NASF).

In our opinion, the responses shown in Table 7 of the EIS to the issues raised by DIRD are incomplete. We acknowledge that, in part, this is due to the lack of precise information about future operations at the WSA that was available at the time the EIS was written.

For example, in response to DIRD's comment about the potential for the two 100 metre high stacks to penetrate WSA's protected airspace surfaces and so be an obstacle to aircraft flying

to and from WSA, the EIS responds by saying it is not yet possible to determine whether or not the proposed facility will extend into that airspace.

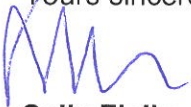
Similarly, in response to DIRD's comment that the plume from the stacks may pose a hazard to aircraft flying overhead, the response is that it is "unlikely the facility will interfere with aircraft operations".

We submit that, given the economic importance of WSA to Sydney generally, and Western Sydney in particular, there needs to be a more precise understanding of these important safety-related issues *before* the assessment of the development of this facility is completed. It would obviously be problematic to discover that, once operational, the facility poses a safety risk to aircraft flying to and from WSA, particularly if the only feasible way to eliminate that risk was to then limit operations at the new airport.

DIRD has indicated it will publicly release a draft Commonwealth EIS and Airport Plan for WSA before the end of the year. Preparation of the latter was only recently facilitated by the successful passage of amendments to the *Airports Act 1996* through the Commonwealth Parliament. We would anticipate that the draft EIS and Airport Plan will contain additional information that will enable the WSA and its implications for the proposed facility to be properly understood. We therefore believe it would be appropriate that no final decision be made on this application until this information has been released by DIRD and considered by the Department of Planning and Environment, and that further consultation with DIRD's Western Sydney Unit be undertaken prior to a determination being made.

If you have any queries, please feel free to contact Sydney Airport's Head of Government and Community relations, Mr Ted Plummer, on 9667 6182.

Yours sincerely



Sally Fielke

General Manager Corporate Affairs