

19 December 2019

Mr Jim Betts Secretary Department of Planning, Industry and Environment GPO Box 39 Sydney NSW 2001

Dear Mr Betts

# Re: Application number SSI-9737 Sydney Gateway Road Project

Thank you for the opportunity to comment on the Environmental Impact Statement (EIS) for the Sydney Gateway road project (the project)

As a significant portion of the project is on Commonwealth land leased to Sydney Airport, Sydney Airport is working in partnership with Transport for NSW to develop and deliver the project. We are also the proponent for a Major Development Plan (MDP) for the project, the consent authority for which is the Commonwealth Minister for Infrastructure, Transport and Regional Development, the Hon. Michael McCormack, MP.

As such, Sydney Airport supports the project and the improvements it will make to access to the airport precinct and Port Botany, to support the forecast significant growth in passenger numbers and freight volumes as outlined in our recently approved *Master Plan 2039*.

We have worked closely with Transport for NSW during the development of the EIS and MDP, and provide the following information on key issues for Sydney Airport for consideration during the NSW planning approval process.

# **Aviation operations and safety**

Ensuring aviation safety and maintaining operational efficiency are Sydney Airport's key priorities. In relation to the project this means we expect:

- A robust Method of Works Plan be developed in consultation with Sydney Airport
- There will be no requirement for any changes to Sydney Airport's operational activities as a result of the project
- There will be no reduction in runway capacity during construction of the project, and no restrictions to runway operations without prior agreement
- There will be no unacceptable or increased risks to aviation, for example from material stockpiling, cranes or other plant
- Design and location of any spoil mounds will fully consider impacts to wind shear and turbulence with modelling to be undertaken to the satisfaction of Sydney Airport and other aviation stakeholders
- Dust and debris are managed effectively to reduce the risks to aviation from Foreign Object Debris (FOD)
- Priority is given during design and construction to avoid attracting wildlife (including birds and flying foxes) to the area, for example in choices of landscaping, management of food waste at construction compounds/staff facilities, and decisions regarding land use adjacent to the Airport at Tempe. Recreational activities that involve food, such as BBQs and picnics, should not be encouraged.
- In addition, any new land uses, including open space, adjacent to airport land to be

compatible with airport operations and public safety, including but not limited to factors such as lighting and activities that create risks of FOD.

Compliance with the National Airports Safeguarding Framework and its guidelines, which the NSW Government has adopted, would ensure these and related matters are appropriately addressed in project delivery.

## **Environmental management**

Key issues for Sydney Airport include:

- Management of contamination at the former Tempe Tip including the prevention of the migration of leachate onto Sydney Airport land
- Appropriate spoil management and storage, including nil transfer of spoil from State land to Sydney Airport land
- Management of surface water and groundwater to prevent migration of contamination, and disturbance to receiving environments
- Construction and operational noise management, particularly for Sydney Airport tenants and local residents, including hotels.

# **Traffic management**

It is imperative that access to Sydney Airport be maintained at all times during construction. This includes:

- Maintaining existing capacity of Airport Drive
- Continuous monitoring and management of traffic conditions so issues or delays can be acted on immediately
- Construction planning and staging decisions must prioritise access to the airport
- Pro-active management and mitigation of potential delays to passengers and commuters, including incentivisation and encouragement to use public rail transport.

#### **Cumulative impacts**

The project will be delivered concurrently with a number of other projects in and around the airport precinct. Cumulative impacts must be properly assessed and managed in conjunction with Sydney Airport so risks to the effective operation of the airport are mitigated. This is of particular concern in relation to the Botany Rail Duplication project, to which we also made a submission to DPIE outlining our concerns about the impacts to Sydney Airport of that proposal.

If you would like any further information regarding any of these issues, please contact me on 9667 6423 or at joseph.chan@syd.com.au.

Yours sincerely,

Joseph Chan

Manager Development and Planning