



27 October 2009

Mr Ted Plummer
Manager – Major Projects Consultation and Communication
Environment Strategy Update
Sydney Airport Corporation

By email: environment@syd.com.au

Dear Mr Plummer,

Re: Sydney Airport Environment Strategy 2010 – 2015

Thank you for the opportunity to comment upon the Preliminary Draft Environment Strategy 2010 – 2015 (PDES). Sydney Airport is not only a major national asset, it is a major asset for the region of Southern Sydney which has a very positive economic impact and is of social benefit a wide range of different ways. It is unfortunate that these great gains come at price, particularly to the environment: both the local environment where the airport is located, and the planet as a significant component in the global aviation network. The effort that Sydney Airport Corporation Limited (SACL) is devoting to the development of the strategy and to consequent action plans is therefore welcome. Southern Sydney Regional Organisation of Councils (SSROC) offers the following comments on the PDES.

Scope of the Environmental Action Plans

The overall coverage of the Environmental Action Plans (EAPs) is comprehensive but could perhaps be expanded to cover some thought-leadership and proactive research and development into environmentally sensitive airport operations. For example:

- a) An EAP focused on the impact of sea level rise on airport, groundwater and wetlands. This does not appear to be covered at all in the strategy, and is a serious omission. Rising sea levels obviously would threaten the infrastructure. It could also affect the groundwater, both its quality and its level, and would be likely to affect the nature of habitat provided by the Sydney Airport Wetlands. Some bird species nest just above the waterline, and will be increasingly marginalised and the sea level rises and more defences are constructed to protect low-

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lying assets such as the airport. There are major risks which should be addressed in both mitigation and adaptation.

- b) An EAP focused specifically on working with the airlines to develop a sustainable aviation industry. Actions could include infrastructure for the supply of alternative fuels, transition planning, and development of more sustainable practices by airlines through research into and development of the ground-based infrastructure required. This would appear to fit well with SACL's undertaking to implement the key strategies of the Global Aviation Industry Commitment. SACL's investment to facilitate the introduction of new quieter, cleaner and fuel-efficient aircraft is a welcome action which suggests that such a targeted action plan would align well with business objectives.
- c) Specific actions within action plans related to airport development projects such as those outlined in the Sydney Airport Master Plan. These would be short-term high-priority actions required as a result of development plans, to ensure alignment with the environmental strategy.

Key Performance Indicators

Some good Key Performance Indicators (KPIs) have been identified, but without targets and few stated current actuals, the measures of are very little value. KPIs need to be measured and a baseline established, then systematically monitored over time, in order to establish whether or not a change has occurred and an intervention has been effective.

Water Management

SSROC understands that there is a major issue of groundwater contamination in and around the Sydney Airport site. It is critical that the EAP also cover the prevention of any spread of the plume beyond its current extent, and appropriate monitoring to verify the effectiveness of these measures. The EAP presented seems to be very generalised. Its focus on reducing the consumption of potable water, whilst welcome, is inadequate.

Furthermore, the strategy mentions the Botany Sands aquifer, but there is no mention of its use (if any) as an alternative water source. The water management EAP would be clearer if it included the role of the aquifer. Its use would appear to be inconsistent with the preventing the plume of contamination from spreading. Clarification of the groundwater status of the site would be helpful in this context; particularly, whether or not the airport is a groundwater embargo zone, and if the aquifer is used as a source of water, then assurance that mechanisms are in place to monitor both the quality of the water and the effects of its use on the plume.

Increasing the ratio of water from non-potable sources is a good way to reduce potable water consumption, but may have negative consequences if the impacts of diverting the water from its current use are not understood and appropriately managed. The KPI "increased ratio of water extracted from alternative sources ..." is therefore inadequate in isolation.

Biodiversity

SSROC welcomes the continuation of the Wetlands Enhancement Program, and other initiatives in this EAP that might reduce the effect of the airport and its operations on biodiversity. Whilst it is recognised that the airport's infrastructure has resulted in a generally disturbed site, SSROC supports SACL's efforts to maintain the remaining and the new habitats of the site for wildlife. It is essential that such habitats are not allowed to degrade simply because they are remnants or have only come into being recently: these sites should be regarded as all the more precious because they are scarce. Loss of habitat is the biggest threat to biodiversity the world over.

Ground Transport

SSROC welcomes the commitment to work with local councils to enhance and extend cycle routes in the surrounding area. A number of such initiatives are currently under way under the broader SSROC Regional Bike Plan, including the Hurstville to Bay cycleway and the Botany Bay Trail, in addition to individual councils' plans. SSROC looks forward to liaising with SACL in relation to these initiatives.

SSROC would be pleased to support SACL in lobbying the NSW Government to remove the station access fee applying to Airport Rail Link Stations, and to provide additional public transport services to and from Sydney Airport.

The Strategy needs to extend into the airport's contribution to traffic in the region. The traffic generated as result of airport operations is significant and needs to be carefully analysed and opportunities for improvements identified. Furthermore, it is essential from the perspective of the region that SACL does this in conjunction with other major contributors to traffic movement such as Port Botany, since the improvements would benefit all and degradation of total traffic flows would be damaging to all. SSROC would be glad to participate in any such initiative, and to work with major stakeholders to approach State and Federal Governments to address the problems arising as a result of increasing traffic volumes in the region.

Waste and Resource Management

There may be an opportunity for the KPIs for waste – increasing the percentages of waste recycled, recovered and diverted from landfill – to be gradually incorporated into the leases of SACL's tenants, if this is not already in place. The leases would need to include specific targets.

SSROC suggests that SACL should encourage and work with the airport retailers to eliminate plastic bags, especially the large numbers of duty free plastic bags. There is a need to identify and deploy alternatives to these bags across the airport's retail and food outlets. More generally, SACL could effectively influence the purchasing practices of stores within the precinct by placing controls on what and how much non-recyclable material can be disposed of through airport waste management systems.

The strategy does not address the greenhouse gas emissions from the airport's waste. Since waste accounts for some 3% of sources of greenhouse gases (as identified in the your Climate Change and Energy Management fact sheet), SACL should include a reduction in waste disposed of as part of its climate change actions.

Aircraft Noise

The Environment Strategy does not address the issue of aircraft noise: SSROC would nevertheless take the opportunity to point out that noise does have an affect on the resident community near the airport. Whilst it is accepted that SACL is not responsible for noise while airborne, SSROC must point out that reductions in the level of noise pollution are welcome. Communities as a whole might accept a level of noise as a compromise in view of the economic and social benefits of flight; but if those same benefits can be achieved with less noise, then that situation would be preferable. It is critical that the night curfew continues, even if modern airliners are technically quieter than their predecessors.

Conclusion

Thank you for the opportunity to contribute these ideas and comments upon the draft Environment Strategy. SACL's efforts to develop the strategy, and its willingness to consult and receive input from stakeholders is appreciated.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'D. Lewis', with a stylized flourish at the end.

David Lewis
General Manager
Southern Sydney Regional Organisation of Councils