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Nature Conservation Saves for Tomorrow

Hon Tayna Plibersek MP
Minister for the Environment and Water
tanya.plibersek.mp@aph.gov.au

5 December 2024

Recommendations from Senate Inquiry for monitoring and reducing noise in natural areas near Western Sydney International airport

Dear Hon Tanya Plibersek,

As President of the Blue Mountains Conservation Society (the Society), I am writing to you about the suggested recommendations contained in the recently released report from the Senate Inquiry into the impact and mitigation of aircraft noise¹.

The Blue Mountains Conservation Society has over 850 members and its mission is to protect the natural environment of the Blue Mountains, and especially the Greater Blue Mountains World Heritage Area (GBMWhA).

As you will know, the Society made submissions to both the draft EIS Western Sydney International (WSI) flight paths in January 2024 and to the Senate Inquiry in April 2024. In addition, I represented the Society as a witness at the hearing in Penrith, NSW in August 2024.

The Society supports many of the report's recommendations; Recommendations 1 and 10 are of particular importance in relation to the GBMWhA.

Recommendation 1. The committee recommends that the conditions for approval of the Western Sydney Airport include a requirement for the Western Sydney Airport Corporation (WSA Co) to study the impact of its flights on Australian native species.

Recommendation 10. The committee recommends that the Australian Government moves Australia's flight path design principles towards an altitude based priorities approach—with a view to prioritising minimising noise for communities, and for Areas of Outstanding Natural Beauty (AONB) and National Parks (below a certain altitude). The Government should conduct an expert review to establish what altitudes should be set for Australian conditions.

The Society strongly supports these recommendations.

¹https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Rural_and_Regional_Affairs_and_Transport/AircraftNoise47/Report

The Society's concerns include:

- **The impacts of the high levels of noise from aircraft movements into and out of WSI on native animals in adjacent protected areas.** The altitude of these flights as they leave the runway and cross Burratorang State Conservation Area (BSCA) and Lake Burratorang in Sydney's Water Catchment will be as low as 2500 ft, with noise levels up to 75dBA. There is considerable international research that shows noise of this intensity negatively impacts avian populations and communities. As the numbers of flights increase over time, the EIS predicts that there will be an average of one aircraft movement every 2 minutes in 2055, many of which will fly over the lower Blue Mountains natural areas. This high level of noise pollution will impose a substantial negative effect on this iconic wilderness.
- **The resulting, highly adverse and detrimental impacts of the flight paths** on the peace and quiet and scenic views of the wilderness areas and lookouts in the GBMWH, which are world-renowned and draw approximately 5 million international and domestic tourists to the Blue Mountains annually.
- **The high level of noise from the aircraft particularly over BSCA, will have a detrimental impact on the native animals inhabiting this area.** However, the EIS failed to detail any real-time data about native animals present in any of the protected areas (including the GBMWH), relying only on the desktop data, which is incomplete and not up-to-date.
- **The necessity of collecting baseline data in the relevant protected areas throughout the whole of 2025, before the airport becomes operational, and continue to collect data for at least a further five years.** It is impossible to either predict the potential impacts of noise levels on populations or to plan to mitigate these negative impacts in the future as there is no baseline data from BSCA and nearby sections of the National Park. It is therefore imperative that monitoring is put in place.
- **Monitoring studies must be rigorous, scientific surveys conducted by independent organisations using an agreed set of scientific-based, monitoring criteria.** They should be university level research programs providing results which can be peer-reviewed. The methods to be used by the researchers must provide information that can lead to meaningful comparisons across several years.
- **The establishment of a suitable monitoring program and the Society recommends liaising with the Blue Mountains World Heritage Institute, NSW National Parks and Wildlife Service and University of Western Sydney to do this.** These organisations have the personnel, background and skills to provide advice or to conduct such a scientifically based monitoring program.

Requirement for a new management plan to mitigate detrimental impacts on GBMWH

In addition, the final EIS states that WSA Co do not need to devise a management or mitigation plan to address the negative impacts of aircraft overflights on the Greater Blue Mountains World Heritage Area or any other protected areas, despite this being a requirement of UNESCO². They have made this assertion based on the existence of the NSW Government's GBMWH Strategic Plan

² <https://whc.unesco.org/en/guidance-toolkit-impact-assessments/>

2009³ for the GBMWhA (with an addendum in 2016⁴). The original Strategic Plan is 15 years old, having been written well before any commitment to build an airport at Badgerys Creek. Neither the 2009 Plan nor the 2016 Addendum mention the airport at Western Sydney.

The absence of a plan to mitigate the negative impacts of WSI on the local communities and surrounding natural areas, in particular GBMWhA, is an unacceptable failing of the final EIS and must be addressed. It is the Society's view that WSA Co must work with the NSW Government and the Federal Government, as well as the local community and UNESCO, to rectify this crucial failure in the EIS and formulate a well-designed management plan that provides details of how they will establish the likely impacts to the GBMWhA, how these impacts will be measured and monitored, and how they will be mitigated. This plan and the subsequent impacts and mitigation must be available to the public for scrutiny.

I value the opportunity to discuss these matters in person and can be contacted on my email address if you wish to discuss this further.

Yours sincerely,



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³ <https://www.environment.nsw.gov.au/research-and-publications/publications-search/greater-blue-mountains-world-heritage-area-strategic-plan>

⁴ <https://www.environment.nsw.gov.au/-/media/OEH/Corporate-Site/Documents/Parks-reserves-and-protected-areas/Types-of-protected-areas/greater-blue-mountains-world-heritage-area-strategic-plan-addendum-2016-180173.pdf>